



FEB 24 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-447
Project # C-1100448

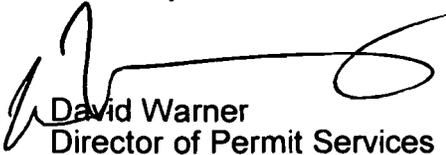
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. E & J Gallo Winery is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct C-447-233-0 into the Title V operating permit. The facility is proposing to install a new 6,000 ft³ storage silo to store diatomaceous earth.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-447-233-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



FEB 24 2010

Phil Castro
E & J Gallo Winery
5610 E Olive Ave
Fresno CA 93727

**Re: Notice of Minor Title V Permit Modification
District Facility # C-447
Project # C-1100448**

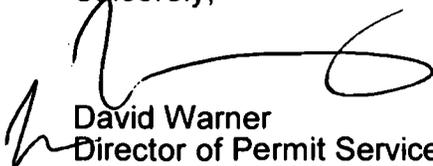
Dear Mr. Castro:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct C-447-233-0 into the Title V operating permit. The facility is proposing to install a new 6,000 ft³ storage silo to store diatomaceous earth.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-447-233-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-8400 FAX: (209) 557-8475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1100448

Engineer: Juscelino Siongco
Date: February 19, 2010

Facility Number: C-447
Facility Name: E & J Gallo Winery
Mailing Address: 5610 E Olive Ave
Fresno CA 93727

Contact Name: Phil Castro
Phone: (559) 458-2417

Responsible Official: Phil Castro
Title: Plant Manager

I. PROPOSAL

E & J Gallo Winery is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) C-447-233-0 into the Title V operating permit. The facility is proposing to install a new 6,000 ft³ storage silo to store diatomaceous earth.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The facility is located at 5610 E Olive Ave, Fresno, CA 93727.

III. EQUIPMENT DESCRIPTION

C-447-233-1: 6,000 CUBIC FEET DIATOMACEOUS EARTH STORAGE SILO SERVED BY A STACLEAN MODEL 9-3.2-BDS BIN VENT FILTER

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

E & J Gallo Winery proposes to install a new 6,000 ft³ storage silo. The silo will be used to store diatomaceous earth. Particulate matter emissions from the operation will be controlled by a bin vent filter.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-447-233-1
- B. Authority to Construct No. C-447-233-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.

C-447-233-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-447-233-1

EXPIRATION DATE: 06/30/2007

EQUIPMENT DESCRIPTION:

6,000 CUBIC FEET DIATOMACEOUS EARTH STORAGE SILO SERVED BY A STACLEAN MODEL 9-3.2-BDS BIN VENT FILTER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the bin vent filter serving the storage silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The bin vent filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The bin vent filter shall operate at all times with a minimum differential pressure of 2.5 inches water column and a maximum differential pressure of 6 inches water column. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Differential operating pressure shall be monitored and recorded on each day that the bin vent filter is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Material removed from the bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
10. A spare set of bags shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
11. PM10 emissions rate from the storage operation shall not exceed 0.00085 lb/ton of diatomaceous earth loaded into the silo. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The maximum daily throughput of diatomaceous earth loaded into the silo shall not exceed 25 tons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The maximum annual throughput of diatomaceous earth loaded into the silo shall not exceed 2,500 tons per calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Permittee shall maintain records of the daily and annual quantity (in tons) of diatomaceous earth loaded into the silo. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

15. Records of all maintenance of the bin vent filter, including all change outs of bags or filter media, shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
17. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

ATTACHMENT B

Authority to Construct No.

C-447-233-0



AUTHORITY TO CONSTRUCT

PERMIT NO: C-447-233-0

ISSUANCE DATE: 11/09/2009

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: 5610 E OLIVE AVE
FRESNO, CA 93727

LOCATION: 5610 E OLIVE AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:
6,000 CUBIC FEET DIATOMACEOUS EARTH STORAGE SILO SERVED BY A STACLEAN MODEL 9-3.2-BDS BIN VENT FILTER

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Visible emissions from the bin vent filter serving the storage silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
6. The bin vent filter shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. The bin vent filter shall operate at all times with a minimum differential pressure of 2.5 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201]
8. Differential operating pressure shall be monitored and recorded on each day that the bin vent filter is in operation. [District Rule 2201]
9. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO

Mart-^ Keant for

DAVID WARNER, Director of Permit Services
C-447-233-0: Nov 9 2009 8:05AM - SANDHUG : Joint Inspection NOT Required

10. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
11. Material removed from the bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
12. A spare set of bags shall be maintained on the premises at all times. [District Rule 2201]
13. PM10 emissions rate from the storage operation shall not exceed 0.00085 lb/ton of diatomaceous earth loaded into the silo. [District Rule 2201]
14. The maximum daily throughput of diatomaceous earth loaded into the silo shall not exceed 25 tons per day. [District Rule 2201]
15. The maximum annual throughput of diatomaceous earth loaded into the silo shall not exceed 2,500 tons per calendar year. [District Rule 2201]
16. Permittee shall maintain records of the daily and annual quantity (in tons) of diatomaceous earth loaded into the silo. [District Rules 1070 and 2201]
17. Records of all maintenance of the bin vent filter, including all change outs of bags or filter media, shall be maintained. [District Rule 2201]
18. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	SOx	PM10	CO	VOC
C-447-233-1	0	0	2	0	0
TOTAL	0	0	2	0	0

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

FEB 17 2010

Permit Application For:

- | | | |
|-------------------------------------|------------------------------|--|
| <input checked="" type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - New Emission Unit |
| <input type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - Modification Of Emission Unit With Valid Permit to Operate |
| <input type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - Renewal of Valid Authority to Construct |
| <input type="checkbox"/> | PERMIT TO OPERATE (PTO) | - Existing Emission Unit Now Requiring a Permit to Operate |

Permit to Operate
SJVAPCD

1. PERMIT TO BE ISSUED TO: E&J Gallo Winery-Fresno	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>5610 E. Olive Avenue</u> CITY: <u>Fresno</u> STATE: <u>CA</u> ZIP CODE: <u>93727</u> <small>9-DIGIT</small>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>same as above</u> CITY: _____ _____/4 SECTION _____ TOWNSHIP _____ RANGE _____	WITHIN 1,000 FT OF A SCHOOL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO S.I.C. CODE(S) OF FACILITY (If known): _____
4. GENERAL NATURE OF BUSINESS: Production of wine, brandy and concentrates	INSTALL DATE: Target Installation and Startup During 1Q10
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC (If yes, please complete and attach a Compliance Certification form (TVFORM-009))? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Request minor permit modification for filter powder silo and baghouse (C-447-233). Minor permit modification submitted prior to emissions unit startup. Please see completed Compliance Certification form and authority to construct permit application.	
7. PERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? Please note that checking "YES" will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. <input type="checkbox"/> 3-day review <input checked="" type="checkbox"/> 10-day review <input type="checkbox"/> No review requested	
8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If yes, ATC/PTO #: <u>C-447</u>	Optional Section 11. DO YOU WANT TO PARTICIPATE IN EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS: "HEALTHY AIR LIVING (HAL)" <input type="checkbox"/> Yes, please send info "INSPECT" <input type="checkbox"/> Yes, please send info
9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? (If "Yes" is checked, please complete the CEQA Information form) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If yes, NOV/NTC #: _____	
12. TYPE OR PRINT NAME OF APPLICANT: Phil Castro	TITLE OF APPLICANT: Plant Manager-Fresno Winery
13. SIGNATURE OF APPLICANT: DATE: <u>02/17/10</u>	PHONE #: (559) 458-2417 FAX #: (559) 458-2410 E-MAIL: phil.castro@ejgallo.com

FOR APCD USE ONLY:

DATE STAMP:	FILING FEE RECEIVED: \$ <u>0</u> CHECK #: _____
	DATE PAID: _____
	PROJECT #: <u>C-1100448</u> FACILITY ID: <u>C-447</u>

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

COMPANY NAME: E&J Gallo Winery - Fresno	FACILITY ID C- 447
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: E&J Gallo Winery-Fresno	
3. Agent to the Owner: Phil Castro	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

Phil Castro

Name of Responsible Official (please print)

Plant Manager - Fresno Winery

Title of Responsible Official (please print)

02/17/10

Date

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California
93726-0244 * (559) 230-5900 * FAX (559) 230-6061