San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JUL 08 2013

Mr. Dan Martin
E & J Gallo Winery
18000 W. River Road
Livingston, CA 93554

Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # N-1237
Project # N-1121070

Dear Mr. Martin:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Gallo has proposed issuance of Permits to Operate for an existing composting operation. The project has been processed as an Authority to Construct (ATC) project in order to incorporate the requirements of District Rule 4566 (Organic Material Composting Requirements) which required submittal of an ATC application on or before February 18, 2012 for implementation of the provisions of that rule.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

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

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

www.valleyair.org w

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

San Joaquin Valley Air Pollution Control District
ATC Application Review
for Green Waste Composting

Facility Name:	E & J Gallo Winery	Date:	June 12, 2013
Mailing Address:	18000 W. River Road Livingston, CA 93554	Engineer:	Dennis Roberts
		Lead Engineer:	Martin Keast
Contact Person:	Dan Martin		
Telephone:	(209) 394-6211		
Email address:	dan.martin@ejgallo.com		
Application Nos:	N-1237-694-0, '-695-0 and '-696-0		
Project No:	N-1121070		
Deemed Complete:	July 2, 2012		

I. PROPOSAL:

E & J Gallo Winery has submitted Permit to Operate (PTOs) applications for their existing green waste composting operations. Prior to November 16, 2007, the District did not require permits for green waste composting operations. Based on the information provided by the applicant, the District has determined that the composting operations were installed prior to this date and District permits were not required at the time of installation. Pursuant to District Rule 2020, Section 9.0, such permit action is considered a loss of exemption and is not be subject to the requirements of District Rule 2201 (New and Modified Stationary Source Review Rule), until such time the emission units are modified.

District Rule 4566 (Organic Material Composting Operations) required submittal of an Authority to Construct application for all facilities subject to the rule by no later than August 12, 2012 for implementation of the watering system provisions of the rule. To satisfy this requirement, this application will be processed as an ATC application, modifying the existing composting operation. Modification of the permit to incorporate mitigation measures required by Rule 4566 is subject to the requirements of Rule 2201.

Per the applicant, the facility's green waste capacity is a maximum of 477 wet tons/day and 40,000 wet tons/year. As indicated in their green waste composting application, this facility currently only processes agricultural green waste that is either shipped off site or composted and used on their vineyards.

E&J Gallo Winery received their Title V Permit on June 27, 2000. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. E&J Gallo Winery must apply to administratively amend their Title V permit.

II. APPLICABLE RULES:

Rule 2010: Permits Required (12/17/1992)
Rule 2020: Exemptions (12/20/2007)
Rule 2201: New and Modified Stationary Source Review Rule (6/10/2010)
Rule 2410: Prevention of Significant Deterioration (6/16/2011)
Rule 2520: Federally Mandated Operating Permits (6/21/2001)
Rule 4101: Visible Emissions (2/17/2005)
Rule 4102: Nuisance (12/17/1992)
Rule 4202: Particulate Matter - Emission Rate (12/17/1992)
Rule 4565: Biosolids, Animal Manure, and Poultry Litter Operations (3/15/2007)
Rule 4566: Green Waste Composting and Operations (8/18/11)
Rule 8011: General Requirements (8/19/2004)
Rule 8031: Bulk Materials (8/19/2004)
Rule 8041: Carryout and Trackout (8/19/2004)
Rule 8061: Paved and Unpaved Roads (8/19/2004)
Rule 8071: Unpaved Vehicle/Equipment Traffic Areas (9/16/2004)
California Health & Safety Code Section 41700 (Public Nuisance)
California Health & Safety Code Section 42301.6 (School Notice)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION:

The facility is located at 18000 W. River Road, Livingston, California. This facility and associated equipment are not located within 1,000 feet of a kindergarten through 12th grade school site boundary. Therefore, school noticing requirements of California Health and Safety Code Section 42301.6 do not apply to this project.

IV. PROCESS DESCRIPTION:

Feedstock Organic Waste Material Receiving, Storage, and Mixing:

As indicated by the applicant, primarily uses grape pomace from their wine making processes as green waste feedstock materials used for composting. The grape pomace is delivered via dump trucks from the wine-making processes and unloaded directly onto the receiving section of the staging area. The staging area is utilized to sort the pomace that will either be shipped offsite or moved to their composting storage piles.

Particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}) is generated from the green waste feedstock materials stockpiling and transfers due to the material drops and disturbance. Volatile Organic Compounds (VOC) and ammonia (NH_3) emissions are also generated from the decomposition of the stored green waste feedstock materials.

Open Windrow Composting:

Composting is the aerobic decomposition of organic materials by microorganisms under controlled conditions into a soil-like substance called compost. Windrow composting involves placing organic materials in long, narrow triangular cross section piles and turning or aerating them on a regular basis. The organic materials to be composted are transferred to the windrow composting area, where the materials are formed into windrow piles. The windrow piles are built and shaped, typically using a front-end loader, with typical dimensions of 3 to 12 feet high, 8 to 20 feet wide, and 50 to 500 feet long. For this facility, the windrow piles are 5 feet high, 12 feet wide and 500 feet long for both the active and curing phases.

The active phase of the composting process begins once the organic materials are formed into windrow piles. During this active stage, microorganisms start to break down the material and consume the most easily degradable organic matter giving off a significant amount of heat. The formed windrows are turned or aerated using a front-end loader or windrow turning machine weekly or more often depending on the middle temperature of the windrows. The windrows are turned after pathogen and weed seed destruction temperature have been reached (typically between 120°F to 150°F), but before reaching temperatures that impede composting (typically above 160°F). The active composting stage will typically last three to nine weeks, depending on the type of materials and frequency of turning.

At the end of the active composting stage, most of the easily degradable organic material has been decomposed. The remaining organic material decomposes much more slowly and is the beginning of the curing phase of the composting process. The compost may be left in the windrows or moved to a larger pile where it is allowed to further decompose very slowly over a period of weeks or months, depending on the desired final quality of the product. During this phase little additional heat is generated and minimal turning is needed. The compost becomes biologically stable and the pile will gradually cool to near air temperature. Once the maturing process is complete, the compost material is applied to the vineyards after post-harvest work in the vineyards has been completed.

PM_{10} is generated due to the forming of the composting piles and from the periodic turning or aeration of the formed composting piles. VOC and NH_3 emissions are also generated from the decomposition of the organic material in the composting piles.

Finished Compost Load out Operation

The finished compost product is loaded onto trucks with front-end loaders.

PM_{10} is generated due to the loading of the finished compost. There are no VOC and NH_3 emissions from the finished compost product since all the decomposition of the organic material is completed by the end of the curing phase of the composting process.

Operating Schedule & Process Rate:

The equipment may operate up to 24 hours per day and 365 days/year at the following proposed processing rates:

PTO Number	Maximum Processing Rates
N-1237-694-0	Daily Quantity of Green Waste Material Received: 477 wet tons/day Annual Quantity of Green Waste Material Received: 40,000 wet tons/year
N-1237-695-0	Daily Quantity of Active Phase Composting Piles: 477 wet tons/day Annual Quantity of Active Phase Composting Piles: 40,000 wet tons/year Daily Quantity of Curing Phase Composting Piles: 477 wet tons/day Annual Quantity of Curing Phase Composting Piles: 40,000 wet tons/year
N-1237-696-0	Daily Quantity of Finished Compost Loaded: 220 tons/day (see page 6 of this document) Annual Quantity of Finished Compost Loaded: 10,000 tons/year [1]

V. EQUIPMENT LISTING:

N-1237-694-0:
GREEN WASTE ORGANIC MATERIAL RECEIVING, STORAGE, AND MIXING OPERATION

N-1237-695-0:
OPEN WINDROW ACTIVE AND CURING PHASE GREEN WASTE COMPOSTING OPERATION

N-1237-696-0:
FINISHED COMPOST STORAGE AND LOAD OUT OPERATION

VI. EMISSION CONTROL TECHNOLOGY EVALUATION:

N-1237-694-0:

The existing green waste feedstock material receiving, storage, and mixing operations will produce VOC, NH_3 and PM_{10} emissions. Also, there is the potential for other odorous emissions. To reduce the fugitive VOC emissions from the feedstock piles, the facility has proposed to comply with the stockpile requirements of Rule 4566, Section 5.1.1. The facility has proposed that within 10 days of receipt of organic material at the facility, the facility will comply with one of the following: (a). Remove the organic material form the facility; (b). Start the active phase of composting; or (c). Cover the organic material with a waterproof cover that have at least a six-feet overlap of adjacent sheets and be securely anchored. By removing, processing, or covering the feedstock piles within 10 days of receipt of the material, the VOC emissions will be reduced when compared to the previous processing time.

A water sprinkler system will continue to be used, as needed, to control the fugitive dust (PM_{10}) emissions during the receiving, handling, loading, and mixing of the feedstock materials. On site haul roads will be kept adequately moist to reduce fugitive dust emissions with the use of a water truck.

N-1237-695-0:

The existing windrow composting operations will produce VOC, NH_3 and PM_{10} emissions. Also, there is the potential for other odorous emissions. To reduce VOC emissions from the active-phase composting windrows the facility is proposing to comply with composing requirements of Rule 4566, Section 5.2.1.1. The facility will now implement at least three

[1] Per applicant

turns of the windrow piles during the active-phase process and install an independent watering system that complies with the composting mitigation measures outlined in Table 1 of Rule 4566. As determined by from the San Joaquin Valley Air Pollution Study Agency's field study the use of a watering system will provide a 19% reduction in VOC emissions during the active phase composting process.

A water sprinkler system will be used, as needed, to control the fugitive dust (PM_{10}) emissions during the handling and turning of the window piles. Fugitive dust (PM_{10}) emissions from the windrows will be controlled by the high moisture content of the composting material (typically 40% to 65%) and by facility water trucks when required. On site haul roads will be kept adequately moist to reduce fugitive dust emissions with the use of a water truck.

VII. CALCULATIONS:

A. Assumptions:

The District will use the emission factors for green waste composting operation to calculate emissions from the receiving, windrow and load out of grape pomace since there is limited emissions data available for grape pomace operations.

N-1237-694-0:

1. PM_{10} will be emitted from the receiving, handling, and mixing of the green waste feedstock organic materials.
2. VOC and NH_3 will be emitted from the storage of the green waste feedstock organic materials.
3. PM_{10} control efficiency of at least 70%[(2)] for handling of high moisture content material (25%) with wet spray dust suppression (pre-project and post project).
4. For feedstock organic materials receiving and transfer to storage area there will be a total of 3 drop points consisting of the following: (a) 1-drop point from the receiving of the material; (b) 2-drop points from the transfer of the material from the receiving area to the storage pile.
5. For feedstock organic materials mixing there will be a total of 2 drop points consisting of the repeated lifting and dropping of the materials with a front-end loader.
6. Maximum stockpile storage time will be 10 days.

N-1237-695-0:

1. VOC and NH_3 will be emitted from the active phase and curing phase windrows.
2. PM_{10} will only be emitted during the forming of the active phase windrow piles. PM_{10} emissions during the turning of the active phase windrows and forming of the curing phase windrows are assumed to be negligible due to high moisture content of materials handled (moisture content is typically 40% to 65%).

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2 Per AP-42, Table B.2-3 (AIRS Code 061), the average control efficiency for dust suppression with water spray is 70% for particulate matter with an aerodynamic diameter smaller than or equal to 10 microns (PM_{10}).

3. For the forming of the windrow composting piles there will be a total of 2 drop points consisting of the transfer of the mixed compost materials from the mixing pile to the windrow pile.
4. As a worst-case for emissions, assume the entire annual capacity of organic materials of 40,000 tons will be on site in the windrows piles.
5. VOC emissions from at least three turns of the windrow piles and use of an independent watering system all during the active-phase composting period will reduce the VOC emissions by 19%.

N-1237-696-0:

1. PM_{10} will be emitted from the loading of the finished compost into trucks.
2. No VOC and NH_3 will be emitted from the finished compost since all decomposition of the organic material will be completed at the end of the curing phase.
3. For the loading of the finished compost into trucks there will be a total of 2 drop points consisting of the transfer of the finished compost materials from the storage piles to the truck.
4. A maximum of 10 trucks per day at 22 tons per truck will be loaded.

B. Emission Factors (EF):

N-1237-694-0, N-1237-695-0 and N-1237-696-0:

Pre & Post-Project Emission Factors (EF1 & EF2)		
Pollutant (Emission Source)	EF1 & EF2	Source
PM_{10} (Receiving, Mixing, & Storage)	0.00033 (lb-PM_{10}/wet ton)	Project #: C-1101871
VOC (Stockpiles)	1.063 (lb-VOC/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
NH_3 (Stockpiles)	0.318 (lb-NH_3/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
VOC (Active Phase Windrows)	0.086 (lb-VOC/wet ton/day) 5.14 (lb-VOC/wet ton)	District Green Waste Compost Emission Factor Report (9/15/10)
VOC (Curing Phase Windrows)	0.0095 (lb-VOC/wet ton/day) 0.57 (lb-VOC/wet ton)	District Green Waste Compost Emission Factor Report (9/15/10)
NH_3 (Active Phase Windrows)	0.017 (lb-NH_3/wet ton/day) 0.997 (lb-NH_3/wet ton)	District Green Waste Compost Emission Factor Report (9/15/10)
NH_3 (Curing Phase Windrows)	0.0019 (lb-NH_3/wet ton/day) 0.111 (lb-NH_3/wet ton)	District Green Waste Compost Emission Factor Report (9/15/10)
PM_{10} (Loadout)	0.00033 (lb-PM_{10}/wet ton)	Project #: C-1101871

C. Potential to Emit (PE) Calculations:

1. Pre-Project Potential to Emit (PE1):

Annual PE1 Calculations:

N-1237-694-0:

The annual PE1 emissions will be calculated utilizing the emission factors as stated in Section VII.B. and based on the following as provided by the applicant:

Maximum Stockpile Storage Time: 10 days
Annual Material Receiving/Mixing/Storage Rate: 40,000 wet tons/year

Total Drop Points = 3 Drop Points (Receiving) + 2 Drop Points (Mixing)
= 5 Drop Points (Total)

Annual $PE1_{PM10\text{-}Receiving/Mixing}$ = 5 Drop Points × Receiving/Mixing Rate (wet ton/year) × $EF1_{PM10/Receiving/Transfer}$ (lb-PM_{10}/wet ton)

Annual $PE1_{VOC}$ = Annual Storage Weight (wet ton/year) × Stockpile Storage Time (days) × $EF1_{VOC/Stockpiles}$ (lb/wet ton/day)

Annual $PE1_{NH3}$ = Annual Storage Weight (wet ton/year) × Stockpile Storage Time (days) × $EF1_{NH3/Stockpiles}$ (lb/wet ton/day)

Annual PE1 for Permit N-1237-694-0				
Pollutant	**Drop Points**	**Receiving/Mixing Rate**	**EF1**	**Annual PE1**
PM_{10}	5 drop points (Receiving/Mixing)	40,000 wet tons/year	0.00033 lb-PM_{10}/wet ton	**66 lb/year**
Pollutant	**Storage Days**	**Storage Weight**	**EF1**	**Annual PE1**
VOC	10 storage days	40,000 wet tons/year	1.063 lb-VOC/wet ton/day	**425,200 lb/year**
NH_3	10 storage days	40,000 wet tons/year	0.318 lb-NH_3/wet ton/day	**127,200 lb/year**

N-1237-695-0:

The annual PE1 emissions will be calculated utilizing the emission factors as stated in Section VII.B. and based on the following as provided by the applicant:

Annual Material Transfer Rate: 40,000 wet tons/year
Annual Composting Weight: 40,000 wet tons/year

Annual $PE1_{PM10}$ = # of Drop Points × Annual Transfer Rate (wet ton/year) × $EF1_{PM10/Transfer}$ (lb-PM_{10}/ton)

Annual $PE1_{VOC/Windrow\ Active\text{-}Phase}$ = Annual Composting Weight (wet ton/year) × $EF1_{VOC/Windrow\ Active\ Phase}$ (lb/wet ton)

Annual $PE1_{VOC/Windrow\ Curing\text{-}Phase}$ = Annual Composting Weight (wet ton/year) × $EF1_{VOC/Windrow\ Curing\ Phase}$ (lb/wet ton)

Annual $PE1_{NH3/Windrow\ Active\text{-}Phase}$ = Annual Composting Weight (wet ton/year) × $EF1_{NH3/\ Windrows\ Active\text{-}Phase}$ (lb/wet ton)

Annual $PE2_{NH3/Windrow\ Curing\text{-}Phase}$ = Annual Composting Weight (wet ton/year) × $EF1_{NH3/\ Windrows\ Curing\text{-}Phase}$ (lb/wet ton)

Annual PE1 for Permit N-1237-695-0				
Pollutant	**Drop Points**	**Transfer Rate**	**EF1**	**Annual PE1**
PM_{10}	2	40,000 wet tons/year	0.00033 lb-PM_{10}/wet ton	**26 lb/year**

Annual PE1 for Permit N-1237-695-0			
Pollutant	**Composting Weight**	**EF1**	**Annual PE1**
VOC (Active-Phase)	40,000 wet tons/year	5.14 lb-VOC/wet ton	**205,600 lb/year**
VOC (Curing Phase)	40,000 wet tons/year	0.57 lb-VOC/wet ton	**22,800 lb/year**
Combined Annual VOC			**228,400 lb/year**
Pollutant	**Composting Weight**	**EF1**	**Annual PE1**
NH_3 (Active-Phase)	40,000 wet tons/year	0.997 lb-NH_3/wet ton	**39,880 lb/year**
NH_3 (Curing-Phase)	40,000 wet tons/year	0.111 lb-NH_3/wet ton	**4,440 lb/year**
Combined Annual NH_3			**44,320 lb/year**

N-1237-696-0:

The annual PM_{10} emissions will be calculated as follows:

Annual PE_{PM10} = # of Transfer Points × Processing Rate (ton/day) × $EF_{PM10/Transfer\ Points}$ (lb-PM_{10}/ton)

Daily and Annual PE2 for Permit Unit N-1237-696-0				
Process Description	**# of Drop Points**	**Processing Rate tons/year**	**EF (lb-PM_{10}/ton)**	**Daily & Annual PE2**
Material Transfer from the Storage Piles to Trucks	2	10,000 tons/year	0.00033	**7 lb/year**

2. Post-Project Potential to Emit (PE2):

Annual PE2 Calculations:

N-1237-694-0:

The daily PM_{10}, VOC, and NH_3 emissions will be calculated as follows based on the following as proposed by the applicant:

Maximum Stockpile Storage Time: 10 days

Daily Material Receiving/Mixing Rate: 477 wet tons/day

Daily Stockpile Storage Weight: 477 wet tons/day

Annual Material Receiving/Mixing/Storage Rate: 40,000 wet tons/year

Total Drop Points = 3 Drop Points (Receiving) + 2 Drop Points (Mixing)
= 5 Drop Points (Total)

Daily $PE2_{PM10\text{-}Receiving/Mixing}$ = 5 Drop Points × Receiving/Mixing Rate (wet ton/day) × $EF2_{PM10/Receiving\ \&\ Mixing}$ (lb-PM_{10}/wet ton)

Annual $PE2_{PM10\text{-}Receiving/Mixing}$ = 5 Drop Points × Receiving/Mixing Rate (wet ton/year) × $EF2_{PM10/Receiving/Transfer}$ (lb-PM_{10}/wet ton)

Daily $PE2_{VOC}$ = Daily Storage Weight (wet ton/day) × Stockpile Storage Time (days) × $EF2_{VOC/Stockpiles}$ (lb/wet ton)

Annual $PE2_{VOC}$ = Annual Storage Weight (wet ton/year) × Stockpile Storage Time (days) × $EF2_{VOC/Stockpiles}$ (lb/wet ton)

Daily $PE2_{NH3}$ = Daily Storage Weight (wet ton/day) × Stockpile Storage Time (days) × $EF2_{NH3/Stockpiles}$ (lb/wet ton)

Annual $PE2_{NH3}$ = Annual Storage Weight (wet ton/year) × Stockpile Storage Time (days) × $EF2_{NH3/Stockpiles}$ (lb/wet ton)

Daily and Annual PE2 for ATC Permit N-1237-694-0				
Pollutant	**Drop Points**	**Receiving/Mixing Rate**	**EF2**	**Daily & Annual PE2**
PM_{10}	5 drop points (Receiving/Mixing)	477 wet tons/day	0.00033 lb-PM_{10}/wet ton	**0.8 lb/day**
PM_{10}	5 drop points (Receiving/Mixing)	40,000 wet tons/year	0.00033 lb-PM_{10}/wet ton	**66 lb/year**
Pollutant	**Storage Days**	**Storage Weight**	**EF2**	**Daily & Annual PE2**
VOC	10 storage days	477 wet tons/day	1.063 lb-VOC/wet ton	**5,070.5 lb/day**
VOC	10 storage days	40,000 wet tons/year	1.063 lb-VOC/wet ton	**425,200 lb/year**
NH_3	10 storage days	477 wet tons/day	0.318 lb-NH_3/wet ton	**1,516.9 lb/day**
NH_3	10 storage days	40,000 wet tons/year	0.318 lb-NH_3/wet ton	**127,200 lb/year**

N-1237-695-0:

The active phase composting process will be controlled with the use of an independent watering system with three windrow turns which will reduce the VOC emissions by 19%. The daily PM_{10}, VOC, and NH_3 emissions will be calculated as follows based on the following:

Daily Material Transfer Rate: 477 wet tons/day
Annual Material Transfer Rate: 40,000 wet tons/year
Annual Composting Weight: 40,000 wet tons/year
Mitigation Measure Control Efficiency (CE): 19%

$$\text{Annual } PE2_{PM10} = \text{\# of Drop Points} \times \text{Annual Transfer Rate (wet ton/year)} \times EF2_{PM10/Transfer} \text{ (lb-}PM_{10}\text{/ton)}$$

$$\text{Daily } PE2_{VOC/Windrow\ Active\text{-}Phase} = \text{Daily Active-Phase Composting Weight (wet ton)} \times EF2_{Daily\ VOC/Windrows\ Active\text{-}Phase} \text{ (lb/wet ton)} \times (1 - CE)$$

$$\text{Annual } PE2_{VOC/Windrow\ Active\text{-}Phase} = \text{Annual Composting Weight (wet ton/year)} \times EF2_{VOC/Windrow\ Active\ Phase} \text{ (lb/wet ton)} \times (1 - CE)$$

$$\text{Daily } PE2_{VOC/Windrow\ Curing\text{-}Phase} = \text{Curing-Phase Composting Weight (wet ton/day)} \times EF2_{Daily\ VOC/Windrows\ Curing\text{-}Phase} \text{ (lb/wet ton)}$$

$$\text{Annual } PE2_{VOC/Windrow\ Curing\text{-}Phase} = \text{Annual Composting Weight (wet ton/year)} \times EF2_{VOC/Windrow\ Curing\ Phase} \text{ (lb/wet ton)}$$

$$\text{Daily } PE_{NH3/Windrow\ Active\text{-}Phase} = \text{Daily Active-Phase Composting Weight (wet ton/day)} \times EF2_{Daily\ NH3/Windrows\ Active\text{-}Phase} \text{ (lb/wet ton)} \times (1 - CE)$$

Annual $PE2_{NH3/Windrow\ Active\text{-}Phase}$ = Annual Composting Weight (wet ton/year) × $EF_{NH3/\ Windrows\ Active\text{-}Phase}$ (lb/wet ton) × (1 – CE)

Daily $PE2_{NH3/Windrow\ Curing\text{-}Phase}$ = Daily Curing-Phase Composting Weight (wet ton/day) × $EF2_{Daily\ NH3/\ Windrows\ Curing\text{-}Phase}$ (lb/wet ton/day)

Annual $PE2_{NH3/Windrow\ Curing\text{-}Phase}$ = Annual Composting Weight (wet ton/year) × $EF2_{NH3/\ Windrows\ Curing\text{-}Phase}$ (lb/wet ton)

Daily and Annual PE2 for ATC Permit N-1237-965-0				
Pollutant	**Drop Points**	**Transfer Rate**	**EF2**	**Daily & Annual PE2**
PM_{10}	2	477 wet tons/day	0.00033 lb-PM_{10}/wet ton	**0.3 lb/day**
PM_{10}	2	40,000 wet tons/year	0.00033 lb-PM_{10}/wet ton	**26 lb/year**
Pollutant	**Control Efficiency (CE)**	**Composting Weight**	**EF2**	**Daily PE2**
VOC (Active-Phase)	0.19	40,000 wet tons	0.086 lb-VOC/wet ton/day	**2786.4 lb/day**
VOC (Curing-Phase)	0	40,000 wet tons	0.0095 lb-VOC/wet ton/day	**380.0 lb/day**
Combined Daily VOC				**3166.4 lb/day**
Pollutant	**Control Efficiency (CE)**	**Composting Weight**	**EF2**	**Annual PE2**
VOC (Active-Phase)	0.19	40,000 wet tons/year	5.14 lb-VOC/wet ton	**166,536 lb/year**
VOC (Curing Phase)	0	40,000 wet tons/year	0.57 lb-VOC/wet ton	**22,800 lb/year**
Combined Annual VOC				**189,336 lb/year**
Pollutant	**Control Efficiency (CE)**	**Composting Weight**	**EF2**	**Daily PE2**
NH_3 (Active-Phase)	0	40,000 wet tons	0.017 lb-NH_3/wet ton/day	**680.0 lb/day**
NH_3 (Curing-Phase)	0	40,000 wet tons	0.0019 lb-NH_3/wet ton/day	**76.0 lb/day**
Combined Daily NH_3				**756.0 lb/day**
Pollutant	**Control Efficiency (CE)**	**Composting Weight**	**EF2**	**Annual PE2**
NH_3 (Active-Phase)	0	40,000 wet tons/year	0.997 lb-NH_3/wet ton	**39,880 lb/year**
NH_3 (Curing-Phase)	0	40,000 wet tons/year	0.111 lb-NH_3/wet ton	**4,440 lb/year**
Combined Annual NH_3				**44,320 lb/year**

N-1237-696-0:

The annual PM_{10} emissions will be calculated as follows:

Annual PE_{PM10} = # of Transfer Points × Processing Rate (ton/day) × $EF_{PM10/Transfer\ Points}$ (lb-PM_{10}/ton)

Daily and Annual PE2 for Permit Unit N-1237-696-0				
Process Description	**# of Drop Points**	**Processing Rate (ton/year)**	**EF (lb-PM_{10}/ton)**	**Daily & Annual PE2**
Material Transfer from the Storage Piles to Trucks	2	220 tons/day	0.00033	**0.1 lb/day**
	2	10,000 tons/year	0.00033	**7 lb/year**

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

The facility acknowledges that its VOC emissions are already above the Offset and Major Source Thresholds; therefore, SSPE calculations for VOC are not necessary and permit units that only emit VOC will not be shown in the SSPE calculations below. SSPE1 is taken from District Project N-1123806:

Stationary Source Potential to Emit [SSPE1] (lb/year)						
Permit Unit	NO_X	SO_X	PM_{10}	CO	VOC	NH3
N-1237-1-2	0	0	0	0	-	0
N-1237-3-8	1,080	86	150	4,440	-	0
N-1237-4-13	12,994	3,760	6,570	194,472	-	0
N-1237-5-2	0	0	528	0	-	0
N-1237-6-3	0	0	73	0	-	0
N-1237-7-2	0	0	0	0	-	0
N-1237-8-2	0	0	0	0	-	0
N-1237-9-2	0	0	0	0	-	0
N-1237-10-2	0	0	0	0	-	0
N-1237-12-2	3,942	431	262	552	-	0
N-1237-17-2	0	0	657	0	-	0
N-1237-480-3	0	0	14	0	-	0
N-1237-596-0	0	0	99	0	-	0
N-1237-601-0	0	0	7	0	-	0
N-1237-602-0	0	0	115	0	-	0
N-1237-603-0	0	0	115	0	-	0
N-1237-694-*	0	0	66	0	-	127,200
N-1237-695-*	0	0	26	0	-	44,320
N-1237-696-*	0	0	7	0	-	0
$SSPE1_{Permit\ Unit}$	18,016	4,277	8,910	199,464	> 20,000	45,837
ERC N-2-2	19,838	0	0	0	-	0
ERC N-2-3	0	0	0	407,020	-	0
$Total_{ERC}$	19,838	0	0	407,020	-	45,837
SSPE1	37,854	4,277	8,910	606,484	> 20,000	45,837

* Preproject, this permit unit did not have a valid Permit to Operate

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

Stationary Source Potential to Emit [SSPE2] (lb/year)						
Permit Unit	NO_X	SO_X	PM_{10}	CO	VOC	NH3
N-1237-1-2	0	0	0	0	-	0
N-1237-3-8	1,080	86	150	4,440	-	0
N-1237-4-13	12,994	3,760	6,570	194,472	-	0
N-1237-5-2	0	0	528	0	-	0
N-1237-6-3	0	0	73	0	-	0
N-1237-7-2	0	0	0	0	-	0
N-1237-8-2	0	0	0	0	-	0
N-1237-9-2	0	0	0	0	-	0
N-1237-10-2	0	0	0	0	-	0
N-1237-12-2	3,942	431	262	552	-	0
N-1237-17-2	0	0	657	0	-	0
N-1237-480-3	0	0	14	0	-	0
N-1237-596-0	0	0	99	0	-	0
N-1237-601-0	0	0	7	0	-	0
N-1237-602-0	0	0	115	0	-	0
N-1237-603-0	0	0	115	0	-	0
N-1237-694-0	0	0	66	0	-	127,200
N-1237-695-0	0	0	26	0	-	44,320
N-1237-696-0	0	0	7	0	-	0
$SSPE2_{Permit\ Unit}$	18,016	4,277	8,910	199,464	> 20,000	45,837
ERC N-2-2	19,838	0	0	0	-	0
ERC N-2-3	0	0	0	407,020	-	0
$Total_{ERC}$	19,838	0	0	407,020	-	45,837
SSPE2	37,854	4,277	8,910	606,484	> 20,000	45,837

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Facility emissions pre-project	37,854	4,277	8,910	606,484	> 20,000
Facility emissions – post project	37,854	4,277	8,910	606,484	> 20,000
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	Yes

This source is an existing Major Source for NOx, CO and VOC emissions and will remain a Major Source for NOx, CO and VOC. The facility will remain a Minor Sorce for SOx and PM10.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Estimated Facility PE before Project Increase	XX	3,523*	XX	XX	XXX	XX	XX
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	Y/N	**YES**	Y/N	Y/N	Y/N	Y/N	Y/N

*PE for wine fermentation as stated by facility in 3-year compliance plan submitted for compliance with District Rule 4694

As shown above, the facility is an existing major source for PSD for at least one pollutant. Therefore the facility is an existing major source for PSD.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed on a pollutant-by-pollutant basis to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold. As determine in Section VIII. of this document regarding Rule 2201, this project is exempt from offsets pursuant to Rule 2201, Section 4.6.8. Therefore, BE calculations are not required.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since the emissions from this project are only due to fugitive emissions from the composting operations, which are not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB 288 Major Modification calculation. Therefore this project is not an SB 288 Major Modification and no further discussion is required.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since the emissions from this project are only due to fugitive emissions from the composting operations, which are not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination. Therefore this project is not a Federal Major Modification and not further discussion is required.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclasssified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10
- Greenhouse gases (GHG): CO2, N2O, CH4, HFCs, PFCs, and SF6

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

In the case the facility is new source, the second step of the PSD evaluation is to determine if this new facility will become a new PSD major Source as a result of the project and if so, to determine which pollutant will result in a PSD significant increase.

I. Project Location Relative to Class 1 Area

As demonstrated in the "PSD Major Source Determination" Section above, the facility was determined to be a existing major source for PSD. Because the project is not located within 10 km of a Class 1 area – modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Significance of Project Emission Increase Determination

a. Potential to Emit of attainment/unclassified pollutant for New or Modified Emission Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total potential to emit from all new and modified units is below this threshold, no futher analysis will be needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)						
	NO2	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units	0	0	0	0.05	0.05	0
PSD Significant Emission Increase Thresholds	40	40	100	25	15	75,000
PSD Significant Emission Increase?	No	No	No	No	No	No

As demonstrated above, because the project has a total potential to emit from all new and modified emission units below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required.

VIII. COMPLIANCE:

Rule 2020 - Exemptions

Prior to November 16, 2007, the District did not require permits for green waste composting operations and the existing composting operation is now being permitted due to a loss of exemption. Pursuant to District Rule 2020 (Exemptions), Section 9, the owner operator of an emissions unit that was exempt from written permits at the time of installation, which becomes subject to the provisions of District Rule 2010 (Permits Required), through loss of exemption, shall submit an application for a Permit to Operate and shall not be subject to District Rule 2201 (New and Modified Stationary Source Review Rule), until such time that emissions unit is modified. Pursuant to this rule, this permitting action will treat the existing composting operation as an existing permitted source.

Rule 2201 New and Modified Stationary Source Review Rule

This rule is applicable only to the proposed modification of the existing composting operation (add control measures for compliance with District Rule 4566 – a pollution control project affecting only permit units N-1237-694 and '-695)

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

However, BACT shall not be required for the following:

4.2.3 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from Best Available Control Technology for all air pollutants, provided all of the following conditions are met:

4.2.3.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;

4.2.3.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;

4.2.3.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and

4.2.3.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO_x, or 25 tons per year of VOC, or 15 tons per year of SO_x, or 15 tons per year of PM10, or 50 tons per year of CO.

Since each of the above-listed criteria are met, BACT is not triggered for any pollutant.

B. Offsets

1. Offset Applicability

The proposed modifications are solely for compliance with Rule 4566, and are exempt from offsets if the following criteria are satisfied. Rule 2201, Section 4.6.8 provides the following exemption from offsets.

Emission offsets shall not be required for the following:

4.6.8 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from offset requirements for all air pollutants provided all of the following conditions are met:

4.6.8.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;

4.6.8.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;

4.6.8.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and

4.6.8.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO_x, or 25 tons per year of VOC, or 15 tons per year of SO_x, or 15 tons per year of PM-10, or 50 tons per year of CO.

Since the above-listed criteria are met, offsets are not triggered for any pollutant.

2. Quantity of Offsets Required

As seen above, the project meets the exemption requirements of section 4.6.8 of District Rule 2201; therefore offset calculations are not necessary and offsets are not required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:
a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed, and/or
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

As demonstrated in section VII.C.5 above, the facility is not becoming a Major Source as a result of this project.

b. Major Modification

As demonstrated in VII.C.7, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

c. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project; therefore public noticing is not required for this project for Potential to Emit exceeding the 100 lb/day limit.

d. Offset Threshold

Public notification is required if the Pre-Project Stationary Source Potential to Emit (SSPE1) is increased from a level below the offset threshold to a level exceeding the emissions offset threshold, for any pollutant.

There is no increase in permitted emissions as a result of this project. Therefore, the SSPE is not increasing with this project and an offset threshold cannot be surpassed as a result of this project. A public notice will not be required for offset threshold purposes.

e. SSIPE > 20,000 lb/year

An SSIPE exceeding 20,000 pounds per year for any one pollutant triggers public notice, where SSIPE = SSPE2 - SSPE1.

There is no increase in permitted emissions as a result of this project. As a result, SSPE is not increasing with this project. Therefore, the SSIPE is zero for all pollutants and public notice will not be required for SSIPE purposes.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

N-1237-694-0:

The DELs for the organic waste material receiving, storage, and mixing operations will be based on the maximum quantity of material received along with the emission rate in pounds emitted per wet ton of material received and processed. The following permit conditions will be included on the ATC permit and PTO to enforce the requirements of this section:

- *The quantity of organic waste materials received at this facility shall not exceed 477 wet tons in any single day and 40,000 wet tons in any one calendar year. For the purposes of this permit, organic waste material is considered to be green waste, food waste, and untreated construction wood waste. [District Rules 2201 and 4566]*

- *PM_{10} emissions from the receiving, handling, and mixing of the organic waste materials shall not exceed 0.00167 lb-PM_{10}/wet-ton of material received and processed. [District Rule 2201]*
- *VOC emissions from the storage and processing of the organic waste materials shall not exceed 10.63 lb-VOC/wet ton of material stored and processed. [District Rule 2201]*
- *NH_3 emissions from the storage and processing of the organic waste materials shall not exceed 3.18 lb-NH_3/wet ton of material stored and processed. [District Rule 2201]*

N-1237-695-0:

Since the daily VOC emissions from the organic waste composting operations are daily average values based on a typical 60 day composting life cycle, the DELs for this permit will be based on the calculated daily emissions as determined in Section VII (General Calculations) of this document. In addition, the emissions will also be limited by the maximum quantity of material received for composting, which is limited by the conditions in permit N-1237-694-0. The following permit conditions will be placed on the ATC permit and PTO to enforce the requirements of this section:

- *PM10 emissions from the organic material composting operation shall not exceed 0.3 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: PM10 Emissions (lb/day) = 0.00066 lb-PM10/wet-ton × Total daily quantity of material transferred from the feedstock piles to active-phase composting windrows (in wet-tons/day). [District Rule 2201]*
- *VOC emissions from the organic material composting operation shall not exceed 3166.4 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: VOC Emissions (lb/day) = 0.06966 lb-VOC/wet-ton × Total daily quantity of active phase composting piles utilized onsite (in wet-tons/day) x 0.0095 lb-VOC/wet-tons × Total daily quantity of curing phase composting piles utilized onsite (in wet-tons/day). [District Rule 2201]*
- *NH_3 emissions from the organic material composting operation shall not exceed 756.0 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: NH_3 Emissions (lb/day) = 0.017 lb-NH_3/wet-tons × Total daily quantity of active phase composting piles utilized onsite (in wet tons/day) + 0.0019 lb-NH_3/wet-tons × Total daily quantity of curing phase composting piles utilized onsite (in wet-tons/day). [District Rule 2201]*

N-1237-696-0:

Since no modification was made to this permit unit by this project, it is not subject to the provisions of District Rule 2201. Therefore, DELs are not required to be placed on the permit.

E. Compliance Assurance

The following measures shall be taken to ensure continued compliance with District Rules.

1. Source Testing

These operations will not be utilizing control equipment, which requires source testing by District Policy APR 1705 (Source Testing Frequency). Therefore, source testing for these operations will not be required.

2. Monitoring

There are no monitoring requirements for these modified operations.

3. Record Keeping

Per District Rule 4566 (Organic Material Composting Operations), these operations are subject to recordkeeping requirements. Refer to Section VIII under Rule 4566 for a discussion of the recordkeeping requirements.

4. Reporting

There are no reporting requirements for these modified operations.

Rule 2520 - Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, 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.

As discussed above, the facility has (not) applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with a(n) administrative amendment/minor modification, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application.

Rule 4101 - Visible Emissions

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringelmann 1 or equivalent to 20% opacity. Opacity is expected to be less than 20% provided that these operations are properly performed. The following conditions are listed on each permit:

- ***{15}*** *No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]*

- *All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]*

Compliance is expected with this Rule.

Rule 4102 - Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected provided that these operations are properly performed. The following condition is listed on each permit:

- *{98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]*

Compliance is expected with this Rule.

California Health & Safety Code 41700 (Health Risk Assessment)

The District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, 3/2/01) requires that a risk management review be performed for all projects that result in any increases in emissions of hazardous air pollutants. This project is to issue permits for existing organic waste processing operations with no increase in hazardous air pollutants. Therefore, a risk management review is not required.

Rule 4202 - Particulate Matter – Emission Rate

The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates. The maximum allowable emissions rate is calculated using the following formulas:

$E_{Max.} = 3.59\ P^{0.62}$

Where: E = Emissions in lb/hr
P = Process weight in ton/hr ($P \leq 30$ tons/hr), or

$E_{Max.} = 17.31\ P^{0.16}$

Where: E = Emissions in lb/hr
P = Process weight in ton/hr ($P > 30$ tons/hr)

Permit Number	P (ton/hr)	$E_{Proposed}$ (lb-PM/hr)	$E_{Max.}$ (lb/hr)
N-1237-694-0[3]	60	0.1	33
N-1237-695-0[4]	60	0.04	33
N-1237-696-0[5]	60	0.013	33

Since the proposed PM Emission rates are less than the allowable maximum emission rates, these permit units are expected to operate in compliance with this rule.

Rule 4565 - Biosolids, Animal Manure, and Poultry Litter Operations

The purpose of this rule is to limit the emissions volatile organic compounds (VOC) from operations involving the management of biosolids, animal manure, or poultry litter. Per Section 2.0, this rule applies to all facilities whose throughput consists entirely or in part of biosolids, animal manure, or poultry litter and the operator who landfills, land applies, composts, or co-composts these materials.

The existing facility will only process and compost green waste organic materials. Therefore this rule is not applicable to this facility's operations.

Rule 4566 – Organic Material Composting Operations

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC) from composting operations. Per Section 2.0, this rule applies to composting facilities that compost and/or stockpile organic material.

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3 For this permit unit the maximum process rate is based on a a maximum processing rate limit of 477 tons/day and operating 8 hr/day. The $E_{Proposed}$ is lb/hr based on an emission rate of 0.8 lb/day and operating 8 hrs/day.

4 For this permit unit the maximum process rate is based on a processing rate limit of 477 tons/day and operating 8 hrs/day. The $E_{Proposed}$ is 8 based on an emission rate of 0.3 lb/day and operating 8 hrs/day

5 For this permit unit the maximum process rate is based on a processing rate limit of 477 tons/day and operating 8/ hrs/day. The $E_{Proposed}$ is based on an emission rate of 0.1 lb/day and operating 8 hrs/day

This existing facility receives, stores, mixes, and composts green waste organic materials. Therefore, the facility's green waste organic materials receiving, storage, mixing, and open windrow composting operations are subject to the requirements of this rule.

Section 5.1.1 requires a composting operation, with a total throughput of less than 100,000 wet tons per year of organic material, to comply with one of the following within ten (10) days of receipt of organic material at the facility:

1. Remove the organic material from the facility;
2. Start the active phase of composting;
3. Cover the organic material with a waterproof cover that has at least a six-feet (6') overlap of adjacent sheets and be securely anchored; or
4. Implement an APCO approved alternative mitigation measure, not listed above.

The following condition is listed on PTO N-1237-694-0:

- *Within 10 days of receipt of the organic material to be composted, the permittee shall perform one of the following: (a). Remove the organic material from the facility; (b). Place the organic material in the active-phase composting windrow and start active phase composting; (c). Cover the organic material with a waterproof cover that have at least a six-feet overlap of adjacent sheets and be securely anchored. [District Rules 2201 and 4566]*

Section 5.2.1 requires the operator of a composting operation with a total throughput of less than 200,000 wet tons per year of organic material to comply with one of the following during the active phase of composting:

1. For windrow composting only, implement at least three turns during the active phase and one of the mitigation measures for the Watering Systems in Table 1.

2. Implement an APCO and EPA approved alternative mitigation measure that demonstrates at least a 19% reduction, by weight, in VOC emissions.

The facility has chosen to comply with item 1 above and has selected mitigation measure 1 from Table 1 (Independent Watering System):

a. Apply water to the surface area of each windrow prior to turning. Test each windrow within three hours before turning for adequate water by taking a sample of the compostable material from between the vertical midpoint and the peak of the windrow, at least three inches below the outer surface. For the ball test, form the material into a ball using hand pressure. There should be at least enough water to form a ball when compressed by hand, but the ball may break when tapped.

b. If the ball crumbles during the hand pressure test, apply additional water to the windrow prior to turning until the material passes the ball test, as described in Section 1.a.

The following conditions are listed on PTO N-1237-695-0:

- *The operator shall implement at least three turns of each organic material composting windrow during the active-phase of the composting process. [District Rule 4566]*

- *The operator shall install, maintain, and utilize an independent watering system to apply water to the surface of each active-phase composting windrow prior to turning. The operator shall test each windrow within three hours before turning for adequate water by taking a sample of the organic material in the windrow and passing a "Ball Test". The "Ball Test" is performed by taking a sample of the compostable material from at least three inches below the surface, between the vertical midpoint and the peak of the windrow and forming the sample into a ball using hand pressure. There should be at least enough water in the material to form a ball when compressed by hand, but the ball may break when tapped. If the material cannot form a ball or crumbles during the ball test, then application of additional water to the windrow prior to turning is required until the material passes the ball test. If a rain event occurs prior to turning the windrow, application of additional water to the surface of the windrow will not be required if the material passes the ball test as previously described. [District Rule 4566]*

- *A daily operations log shall be maintained and shall include the following: (a). The date and time the organic material from the windrow was tested for adequate water content using the "Ball Test" and indicate if the material passed the ball test. If the windrow material did not pass the ball test indicate the corrective action taken; (b). The date and time each windrow was turned; (c). Total quantity of organic material transferred from the feedstock piles to the active-phase composting windrows (in wet tons); (d). Total quantity of active phase composting piles utilized onsite (in wet tons); (e). Total quantity of curing phase composting piles utilized onsite (in wet tons); and (f). Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 & 4566] Y [District Rule 4566]*

Section 6.1 requires an operator to submit a Facility Emission Mitigation Plan (FEMP) along with an Authority to Construct (ATC) application, in accordance with Rule 2010 (Permits Required), to incorporate the approved mitigation measures from the facility's FEMP as applicable permit conditions. The operator has satisfied these requirements with the submission of their FEMP along with the ATC permit applications for this project.

Recordkeeping:

Section 6.3.2 requires an operator subject to this rule to maintain an operations log. The operations log shall include the following information on a daily basis: (a). The date the organic material arrives on site; (b). The type of organic material received on site; and (c). The weight (in wet tons) of each type of organic material received on site.

Section 6.3.3 requires an operator of a composting facility subject to the stockpile requirements to maintain an operations log, which includes the following information on a daily basis: (a). The date of which each stockpile was initially formed; (b). The date and action taken on each stockpile to satisfy the stockpile requirements; and (c). Other information necessary to determine compliance with the requirements.

The following permit condition will be included in ATC permit N-1237-694-0 to assure compliance with the recordkeeping requirements of Sections 6.3.2 and 6.3.3:

- *A daily operations log shall be maintained and shall include the following: (a) The date, type , and weight (in wet tons) of each organic material received; (b) The date each stockpile was initially formed; (c) The date and action taken on each stockpile to satisfy the stockpile requirements; (d) Total quantity and type of each organic material stored for composting (in wet tons); (e) Total quantity and type of each organic material mixed for composing (in wet tons); (f) Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 & 4566]*

Section 6.3.4.1 requires an operator of a composting facility subject to the composting requirements for a watering system to maintain an operations log, which includes the following information on a daily basis: (a). Record the date and time the organic material from the windrow was tested for compliance; (b). Indicate whether the windrow passes the ball test and, if applicable, all corrective actions taken; (c). Record the date and time the windrow was turned; (d). Record other information necessary to determine compliance with the requirements.

The following permit condition will be included in ATC permit N-266-641-1 to assure compliance with the recordkeeping requirements of Section 6.3.4.1:

- *A daily operations log shall be maintained and shall include the following: (a) The date and time the organic material from the windrow was tested for adequate water content using the "ball test" and indicate if the material passed the ball test. If the windrow material did not pass the ball test indicate the corrective actions taken; (b) The date and time each windrow was turned; (c) Total quantity of organic material transferred from the stockpiles to the active-phase composting windrows (in wet tons); (d) Total quantity of active-phase composting windrows (in wet tons); (e) Total quantity of curing-phase composting windrows (in wet tons); (f) Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 & 4566]*

Section 6.3.5 requires an operator to retain all applicable records, as specified in the recordkeeping requirements of Section 6.0, on site for a period of five years and the records shall be made available to the APCO upon request. The following permit condition will be included in ATC permits N-266-640-1 and '-641-1 to assure compliance with the requirements of Section 6.3.5:

- *{Modified 3246} 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 Rules 1070 & 4566]*

Section 7.1 requires operators of a composting facility subject to the composting operation requirements of this rule shall submit a complete Facility Emission Mitigation Plan (FEMP) and an Authority to Construct (ATC) application that complies with all applicable requirements of this by the dates indicated in Table 2 of this rule. The earliest compliance date is February 18, 2012 and the latest compliance date is August 18, 2015.

Section 7.2 requires operators of a composting operation subject to the stockpile requirements shall be in full compliance with all stockpile requirements on and after August 18, 2012.

Section 7.3.1 requires operators of a composting facility with a throughput less than 200,000 wet tons per year to be in full compliance with the applicable requirements of Section 5.2.1 on and after August 18, 2012.

Rule 8011 - General Requirements

The definitions, exemptions, requirements, administrative requirements, record keeping requirements, and test methods set forth in this rule are applicable to all rules under Regulation VIII (Fugitive PM_{10} Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

Rule 8031 - Bulk Materials

Pursuant to Section 2.0, this Rule is applicable to the outdoor handling and storage of any bulk material, which emits visible dust when stored or handled. The following condition is listed on each permit.

- *All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]*

Rule 8041 - Carryout and Trackout

Pursuant to Section 2.0, this Rule is applicable to all sites that are subject to Rule 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), Rule 8031 (Bulk Materials), and Rule 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or track out has occurred or may occur. The following condition is listed on each permit:

- *An owner/operator shall prevent or cleanup any carryout or track out in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 or Rule 8011. [District Rule 8041]*

Rule 8051 - Open Areas

Pursuant to Section 2.0, this Rule is applicable to any open area having 3.0 acres or more of disturbed surface area, which has remained undeveloped, unoccupied, unused or vacant for more than seven days. The following condition is listed on each permit:

- *Any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused or vacant for more than seven days shall comply with the requirements of District Rule 8051 (Open Areas), unless specifically exempted under section 4.0. [District Rule 8051]*

Rule 8061 - Paved and Unpaved Roads

Pursuant to Section 2.0, this Rule applies to any paved, or unpaved public or private road, street, highway, freeway, alley, way, access drive, access easement, or driveway constructed or modified after December 10, 1993. The following condition is listed on each permit.

- *Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under section 4.0 of Rule 8061. [District Rule 8061]*

Rule 8071 - Unpaved Vehicle/Equipment Traffic Areas

Pursuant to Section 2.0, this Rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger. The following conditions are listed on each permit.

- *Water, gravel, road mix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]*

- *On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, road mix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]*

- *Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the*

conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission units are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

To ensure that issuance of these permits does not conflict with any conditions imposed by any local agency permit processes, the following permit condition will be listed on each ATC permit as follows:

- *This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act].*

IX. RECOMMENDATION:

Issue permits N-1237-694-0, N-1237-695-0 and N-1237-696-0 subject to the permit conditions on the attached draft Authorities to Construct.

X. BILLING INFORMATION:

Permit Number	Fee Schedule	Fee Description	Fee
N-1267-694-0	3020-06	Miscellaneous	$105
N-1267-695-0	3020-06	Miscellaneous	$105
N-1267-696-0	3020-06	Miscellaneous	$105

APPENDICES:

Appendix A: Draft ATC's

Appendix A

Draft ATC's

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-694-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: ATTN: EHS MANAGER
18000 W RIVER RD
LIVINGSTON, CA 95334

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:
GREEN WASTE ORGANIC MATERIAL RECEIVING, STORAGE, AND MIXING OPERATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director / APCO

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DAVID WARNER, Director of Permit Services
N-1237-694-0 : Jun 25 2013 9 54AM – ROBERTSD : Joint Inspection NOT Required

6. The permittee is allowed to receive the following wastes for the composting operation: green waste, food waste, and construction wood waste. Green waste is defined as any organic waste material generated from gardening, agriculture, or landscaping activities including, but not limited to grass clippings, leave, tree and shrub trimmings, and plant remains. Food waste is defined as table scraps, vegetable and fruit peelings, meat, bones and fish, egg shells, solid dairy products, coffee grounds, bread and toast, paper waste including, but not limited to, napkins, towels, plates, coffee filters, and tea bags. Construction wood waste is defined as any untreated wood materials, including but not limited to, lumber, paper, and cardboard from construction. [District Rule 2010] Federally Enforceable Through Title V Permit

7. The permittee is prohibited to receive the following wastes for the composting operation: biosolids, animal manure, and poultry litter. Biosolids is defined as organic material resulting from the treatment os sewage sludge or wastewater. Animal manure is defines as non-human animal excretions and waste, including, but not limited to, dried solids and urine from cows, cattle, or swine. Poultry litter is defined as poultry excretions and waste, including, but not limited to,dried solids and urine from chickens, turkeys, geese, or ducks. [District Rule 2010] Federally Enforceable Through Title V Permit

8. The quantity of organic waste materials received at this facility shall not exceed 477 wet-tons in any single day and 40,000 wet tons in any one calendar year. For the purposes of this permit, organic waste material is considered to be green waste, food waste, and construction wood waste. [District Rules 2201 and 4566] Federally Enforceable Through Title V Permit

9. PM10 emissions from the receiving, handling, and mixing of the organic waste materials shall not exceed 0.00167 lb-PM10/wet-ton of material received and processed. [District Rule 2201] Federally Enforceable Through Title V Permit

10. VOC emissions from the storage and processing of the organic waste materials shall not exceed 10.63 lb-VOC/wet-ton of material stored and processed. [District Rule 2201] Federally Enforceable Through Title V Permit

11. NH3 emissions from the storage and processing of the organic waste materials shall not exceed 3.18 lb-NH3/wet-ton of material stored and processed. [District Rule 2201] Federally Enforceable Through Title V Permit

12. The operator shall perform one of the following to organic materials within 10 days of receipt at the facility to satisfy the stockpile requirements: (a). Remove the organic material from the facility; (b). Place the organic material in the active-phase composting windrow and start active phase composting; (c). Cover the organic material with a waterproof cover that have at least a six-feet overlap of adjacent sheets and be securely anchored. [District Rule 4566] Federally Enforceable Through Title V Permit

13. A daily operations log shall be maintained and shall include the following: (a) The date, type, and weight (in wet tons) of each organic material received; (b). The date each stockpile was initially formed; (c). The date and action taken on each stockpile to satisfy the stockpile requirements; (d). Total quantity and type of each organic waste material stored for composting (in wet tons); (e). Total quantity and type of each organic waste material mixed for composting (in wet tons); and (f). Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 & 4566] Federally Enforceable Through Title V Permit

14. A cumulative annual log shall be maintained and shall indicate the total quantity and type of each organic waste material received (in wet tons). The records shall be updated at least monthly. [District Rule 1070] Federally Enforceable Through Title V Permit

15. 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 & 4566] Federally Enforceable Through Title V Permit

16. The facility shall be in full compliance with all applicable stockpile requirements of District Rule 4566 on and after August 18, 2012. [District Rule 4566] Federally Enforceable Through Title V Permit

17. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit

18. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 or Rule 8011. [District Rule 8041] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

19. Any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused or vacant for more than seven days shall comply with the requirements of District Rule 8051 (Open Areas), unless specifically exempted under section 4.0. [District Rule 8051] Federally Enforceable Through Title V Permit

20. Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall be implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under Section 4.0 of Rule 8061. [District Rule 8061] Federally Enforceable Through Title V Permit

21. Water, gravel, roadmix or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit

22. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, road mix or chemical/organic dust stabilizers/suppressants, vegetative materials or other District approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit

23. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit

24. This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-1237-695-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: ATTN: EHS MANAGER
18000 W RIVER RD
LIVINGSTON, CA 95334

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:
OPEN WINDROW ACTIVE AND CURING PHASE GREEN WASTE COMPOSTING OPERATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. PM10 emissions from the organic material composting operation shall not exceed 0.3 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: PM10 Emissions (lb/day) = 0.00066 lb-PM10/wet-ton x Total daily quantity of material transferred from the feedstock piles to active-phase composting windrows (in wet-tons/day). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director / APCO

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DAVID WARNER, Director of Permit Services
N-1237-695-0 : Jun 25 2013 9:54AM – ROBERTSD : Joint Inspection NOT Required

7. VOC emissions from the organic material composting operation shall not exceed 3166.4 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: VOC Emissions (lb/day) = 0.06966 lb-VOC/wet-ton x Total daily quantity of active phase composting piles utilized onsite (in wet-tons/day) + 0.0095 lb-VOC/wet-ton x Total quantity of curing phase composting piles utilized onsite (in wet-tons/day). [District Rule 2201] Federally Enforceable Through Title V Permit

8. NH3 emissions from the organic material composting operation shall not exceed 756 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: NH3 Emissions (lb/day) = 0.017 lb-NH3/wet-ton x Total daily quantity of active phase composting piles utilized onsite (in wet-tons/day) + 0.0019 lb-NH3/wet-ton x Total daily quantity of curing phase composting piles utilized onsite (in wet-tons/day). [District Rule 2201] Federally Enforceable Through Title V Permit

9. The total quantity of organic materials composted shall not exceed 40,000 wet tons in any one calendar year. [District Rules 2201 & 4566] Federally Enforceable Through Title V Permit

10. The operator shall implement at least three turns of each organic material composting windrow during the active-phase of the composting process. [District Rule 4566] Federally Enforceable Through Title V Permit

11. The operator shall install, maintain, and utilize an independent watering system to apply water to the surface of each active-phase composting windrow prior to turning. The operator shall test each windrow within three hours before turning for adequate water by taking a sample of the organic material in the windrow and passing a "Ball Test". The "Ball Test" is performed by taking a sample of the compostable material from at least three inches below the surface, between the vertical midpoint and the peak of the windrow and forming the sample into a ball using hand pressure. There should be at least enough water in the material to form a ball when compressed by hand, but the ball may break when tapped. If the material cannot form a ball or crumbles during the ball test, then application of additional water to the windrow prior to turning is required until the material passes the ball test. If a rain event occurs prior to turning the windrow, application of additional water to the surface of the windrow will not be required if the material passes the ball test as previously described. [District Rule 4566] Federally Enforceable Through Title V Permit

12. A daily operations log shall be maintained and shall include the following: (a). The date and time the organic material from the windrow was tested for adequate water content using the "Ball Test" and indicate if the material passed the ball test. If the windrow material did not pass the ball test indicate the corrective action taken; (b). The date and time each windrow was turned; (c). Total quantity of organic material transferred from the feedstock piles to the active-phase composting windrows (in wet tons); (d). Total quantity of active phase composting piles utilized onsite (in wet tons); (e). Total quantity of curing phase composting piles utilized onsite (in wet tons); and (f). Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 & 4566] Federally Enforceable Through Title V Permit

13. A cumulative annual log shall be maintained and shall include the following: (a). Total quantity of active-phase composting piles utilized onsite (in wet tons); (b). Total quantity of curing phase composting piles utilized onsite (in wet tons). The records shall be updated at least monthly. [District Rule 1070] Federally Enforceable Through Title V Permit

14. 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 Rules 1070 & 4566] Federally Enforceable Through Title V Permit

15. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit

16. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of rule 8041 or Rule 8011. [District Rule 8041] Federally Enforceable Through Title V Permit

17. Any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused or vacant for more than seven days shall comply with the requirements of District Rule 8051 (Open Areas), unless specifically exempted under section 4.0. [District Rule 8051] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

18. Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under section 4.0 of Rule 8061. [District Rule 8061] Federally Enforceable Through Title V Permit

19. Water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit

20. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit

21. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit

22. This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-1237-696-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: ATTN: EHS MANAGER
18000 W RIVER RD
LIVINGSTON, CA 95334

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:
FINISHED COMPOST STORAGE AND LOAD OUT OPERATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Seyed Sadredin, Executive Director / APCO

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DAVID WARNER, Director of Permit Services
N-1237-696-0 : Jun 25 2013 9:54AM – ROBERTSD . Joint Inspection NOT Required

7. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of rule 8041 or Rule 8011. [District Rule 8041] Federally Enforceable Through Title V Permit

8. Any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused or vacant for more than seven days shall comply with the requirements of District Rule 8051 (Open Area), unless specifically exempted under section 4.0. [District Rule 8051] Federally Enforceable Through Title V Permit

9. Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under section 4.0 of Rule 8061. [District Rule 8061] Federally Enforceable Through Title V Permit

10. Water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit

11. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit

12. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit

13. 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 San Joaquin County Rule 107] Federally Enforceable Through Title V Permit

14. This permit does not authorize the facility to operate without the required permits from other loca, state, or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080] Federally Enforceable Through Title V Permit

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