



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY 18 2010

Charles Holmes
Gallo Glass Company
605 S. Santa Cruz Ave.
Modesto, CA 95353

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1662
Project # N-1101867**

Dear Mr. Holmes:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-1662-15-0 into the Title V operating permit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1662-15-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin

Executive Director/Air Pollution Control Officer

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

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

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



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY 18 2010

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # N-1662
Project # N-1101867

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Gallo Glass Company is proposing a Title V minor permit modification to incorporate the recently issued N-1662-15-0 into the Title V operating permit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1662-15-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,

David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1101867

Engineer: Don Ctibor
Date: May 10, 2010

Facility Number: N-1662
Facility Name: Gallo Glass Company
Mailing Address: 605 S. Santa Cruz Ave.
Modesto, CA 95353

Contact Name: Charles Holmes
Phone: 209-341-3633

Responsible Official: Charles Holmes
Title: VP-Tech Services

I. PROPOSAL

Gallo Glass Company is proposing a Title V minor permit modification to incorporate the recently issued N-2360-1-6 into this facility (N-1662) as part of the Title V operating permit.

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

II. FACILITY LOCATION

605 S. Santa Cruz Avenue
Modesto, CA

The equipment is not located within 1,000 feet of a K-12 school.

III. EQUIPMENT DESCRIPTION

N-1662-15-0: 17.2 MMBTU/HR HEX MODEL VFTU-342-41860 DRIOX VAPORIZER HEATER WITH TWO (2) COEN MODEL SDAF-10 LOW-NOX BURNERS (RATED AT 8.6 MMBTU/HR EACH)

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Gallo Glass Company is proposing to transfer the existing PTO N-2360-1-6 into facility N-1662 owned by Gallo Glass Company as an ATC N-1662-15-0. All permit conditions will be transferred and conditions 1 and 3-15 will be federally enforceable.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

6. Do not seek to consolidate overlapping applicable requirements.

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

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. N-1662-15-0
- B. Previous Title V Operating Permit No. N-2360-1-6

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
N-1662-15-0

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1662-15-0

EXPIRATION DATE: 06/30/2007

EQUIPMENT DESCRIPTION:

17.2 MMBTU/HR HEX MODEL VFTU-342-41860 DRIOX VAPORIZER HEATER WITH TWO (2) COEN MODEL SDAF-10 LOW-NOX BURNERS (RATED AT 8.6 MMBTU/HR EACH)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
7. Maximum annual heat input of the unit shall not exceed 9 billion Btu per calendar year. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
8. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmv NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.012 lb-PM₁₀/MMBtu, 200 ppmv CO @ 3% O₂ or 0.15 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
9. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306] Federally Enforceable Through Title V Permit
10. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
11. The permittee shall monitor, at least on a monthly basis, the amount of water use, the amount of unit blow down, and the exhaust stack temperature or other operational characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

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

12. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
15. Facilities N-1662 and N-2360 are a part of the same stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Previous Title V Operating Permit No.
N-2360-1-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2360-1-6

EXPIRATION DATE: 02/29/2012

SECTION: TOWNSHIP: MO RANGE:

EQUIPMENT DESCRIPTION:

17.2 MMBTU/HR HEX MODEL VFTU-342-41860 DRIOX VAPORIZER HEATER WITH TWO (2) COEN MODEL SDAF-10 LOW-NOX BURNERS (RATED AT 8.6 MMBTU/HR EACH)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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]
5. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306]
7. Maximum annual heat input of the unit shall not exceed 9 billion Btu per calendar year. [District Rules 2201, 4305, and 4306]
8. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmv NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.012 lb-PM₁₀/MMBtu, 200 ppmv CO @ 3% O₂ or 0.15 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306]
9. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306]
10. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306]
11. The permittee shall monitor, at least on a monthly basis, the amount of water use, the amount of unit blow down, and the exhaust stack temperature or other operational characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]
12. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306]
13. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306]
15. Facilities N-1662 and N-2360 are a part of the same stationary source. [District Rule 2201]

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

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

[x] ADMINISTRATIVE AMENDMENT MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>GALLO GLASS COMPANY</u>	
2. MAILING ADDRESS:	
STREET/P.O. BOX: <u>PO BOX 1230 605 S SANTA CRUZ AVE</u>	
CITY: <u>MOORESTO</u>	STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95353</u>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	INSTALLATION DATE:
STREET: <u>605 S SANTA CRUZ</u> CITY: <u>MOORESTO</u>	<u>1993</u>
1/4 SECTION _____ TOWNSHIP <u>MO</u> RANGE _____	
4. GENERAL NATURE OF BUSINESS:	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
<p><u>17.2 MMBTU/HR HEX MODEL VFTU-342-41860 VAPORIZER HEATER WITH TWO (2) COEN MODEL SDAF-10 LOW-MOX BURNERS (RATED AT 8.6 MMBTU/HR EACH).</u></p> <p style="text-align: center;"><u>L-2360-1-6 ⇒ C-1662</u></p>	
6. TYPE OR PRINT NAME OF APPLICANT:	TITLE OF APPLICANT:
<u>CHARLES W. (BILL) HOLMES</u>	<u>VP-TECH SVCS</u>
7. SIGNATURE OF APPLICANT:	DATE:
<u>Bill Holmes</u>	<u>18 DEC 18</u>
PHONE: <u>(209) 341.3633</u>	FAX: <u>()</u>
EMAIL: <u>bill.holmes@ejgallo.com</u>	

For APCD Use Only:

<p>RECEIVED</p> <p>DEC 24 2006</p>	FILING FEE RECEIVED: <u>\$ 0</u>	CHECK#: <u>N/A</u>
	DATE PAID: <u>12/24/08</u>	
	PROJECT NO: <u>N-1084580</u>	FACILITY ID: <u>N-2360</u>
		<u>Holmes</u>

San Joaquin Valley
Unified Air Pollution Control District

Certification of Truth and Accuracy

Company Name: GALLO GLASS COMPANY	Facility ID: N - 2360
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I declare, under penalty of perjury under the laws of the state of California that based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete:

Bill Holmes

Signature of Responsible Official

18 DEC 2008

Date

CHARLES W. (BILL) HOLMES

Name of Responsible Official (please print)

VP - TECHNICAL SERVICES

Title of Responsible Official (please print)