



JUL 30 2012

Paul Bement
The Wine Group
17000 E. Hwy 120
Ripn, CA 95336

**Re: Notice of Minor Title V Permit Modification
District Facility # N-956
Project # N-1120976**

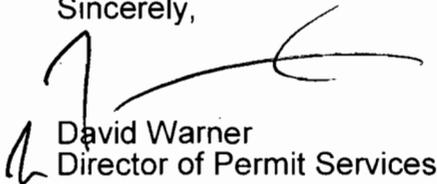
Dear Mr. Bement:

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 Permits to Operate N-956-309-0 to '-318-0 into the Title V operating permit. The proposed permit units N-956-309-1 through '-318-1 are existing distilled spirits storage tanks which are being issued permits as a result of loss-of-exemption.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Permits to Operate N-956-309-0 to '-318-0, 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

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



JUL 30 2012

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-956
Project # N-1120976

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. The Wine Group is proposing a Title V minor permit modification to incorporate the recently issued Permits to Operate N-956-309-0 to '318-0 into the Title V operating permit. The proposed permit units N-956-309-1 through '318-1 are existing distilled spirits storage tanks which are being issued permits as a result of loss-of-exemption.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Permits to Operate N-956-309-0 to '318-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,

David Warner
Director of Permit Services

Enclosures

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Southern Region
34946 Flyover Court
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Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1120976

Engineer: Dennis Roberts
Date: July 24, 2012

Facility Number: N-956
Facility Name: The Wine Group
Mailing Address: 17000 E. Hwy 120
Ripon, CA 95336

Contact Name: Paul Bement
Phone: (209) 253-4217

Responsible Official: Lon Nebolini
Title: General Manager

I. PROPOSAL

The Wine Group is proposing a Title V minor permit modification to incorporate the recently issued Permits to Operate N-956-309-0 through '-318-0 into the Title V operating permit. The proposed permit units N-956-309-1 through '-318-1 are existing distilled spirits storage tanks which are being issued permits as a result of loss-of-exemption.

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

17000 E. Hwy 120
Ripon, CA 95336

III. EQUIPMENT DESCRIPTION

N-956-309-1: 7,528 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 1)

N-956-310-1: 7,528 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 2)

N-956-311-1: 5,071 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 3)

N-956-312-1: 2,853 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 4)

N-956-313-1: 13,504 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 5)

N-956-314-1: 13,504 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 6)

N-956-315-1: 127,781 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 7) WITH PRESSURE/VACUUM VALVE

N-956-316-1: 54,639 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 8) WITH PRESSURE/VACUUM VALVE AND INSULATION

N-956-317-1: 54,639 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 9) WITH PRESSURE/VACUUM VALVE

N-956-318-1: 106,274 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 9) WITH PRESSURE/VACUUM VALVE

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

The Wine Group is proposing to permit 10 existing distilled spirits storage tanks.

N-956-309-1 through '-318-1:

- Condition 1 of the original permit to operate was deleted since this condition is included as condition 42 of the facility-wide requirements N-956-0-1.

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 Title V Operating Permit Nos. N-956-309-1 through '-318-1
- B. Current Permits to Operate N-956-309-0 through '-318-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Title V Operating Permit Nos.
N-956-309-1 through '-318-1

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-309-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

7,528 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 1)

DRAFT

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

DRAFT

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-310-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

7,528 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 2)

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-311-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

5,071 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 3)

DRAFT

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

DRAFT

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-312-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

2,853 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 4)

DRAFT

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

DRAFT

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-313-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

13,504 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 5)

DRAFT

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

DRAFT

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-314-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

13,504 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 6)

DRAFT

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

DRAFT

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-315-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

127,781 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 7) WITH PRESSURE/VACUUM VALVE

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-316-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

54,639 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 8) WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-317-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

54,639 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 9) WITH PRESSURE/VACUUM VALVE

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-956-318-1

EXPIRATION DATE: 09/30/2014

EQUIPMENT DESCRIPTION:

106,274 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 9) WITH PRESSURE/VACUUM VALVE

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

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

ATTACHMENT B

Current Permits to Operate
N-956-309-0 through '-318-0

San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-309-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS:

ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION:

17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

7,528 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 1)

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

THIS IS AN INTERNAL DISTRICT DOCUMENT ONLY. Forward a copy to the Compliance Division and file the original in the premises files. A final Permit can only be issued upon verification of compliance with all applicable local, state, and federal regulations by the Compliance Division. Upon verification of compliance, a recommendation to issue the Permit to Operate will be forwarded to the Permit Services Division by the Compliance Division staff.

N-956-309-0: Jul 25 2012 9:42AM - ROBERTSD : Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-310-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS: ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION: 17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:
7,528 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 2)

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-311-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.
MAILING ADDRESS: ATTN: A/P 1931

P O BOX 90
TRACY, CA 95378-0090

LOCATION: 17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:
5,071 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 3)

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-312-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS:

ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION:

17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

2,853 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 4)

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-313-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS:

ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION:

17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

13,504 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 5)

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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N-956-313-0: Jul 25 2012 9:42AM - ROBERTSD : Joint Inspection NOT Required

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San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-314-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS:

ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION:

17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

13,504 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 6)

CONDITIONS

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San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-315-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS: ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION: 17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

127,781 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 7) WITH PRESSURE/VACUUM VALVE

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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N-956-315-0: Jul 25 2012 9:42AM - ROBERTSD : Joint Inspection NOT Required

San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-316-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS:

ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION:

17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

54,639 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 8) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

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San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-317-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS:

ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION:

17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

54,639 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 9) WITH PRESSURE/VACUUM VALVE

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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N-956-317-0: Jul 25 2012 9:43AM - ROBERTSD : Joint Inspection NOT Required

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San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-956-318-0

ISSUANCE DATE: 03/21/2012

LEGAL OWNER OR OPERATOR: THE WINE GROUP, INC.

MAILING ADDRESS:

ATTN: A/P 1931
P O BOX 90
TRACY, CA 95378-0090

LOCATION:

17000 E HIGHWAY 120
RIPON, CA 95366

EQUIPMENT DESCRIPTION:

106,274 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 9) WITH PRESSURE/VACUUM VALVE

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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N-956-318-0: Jul 25 2012 9:43AM -- ROBERTSD : Joint Inspection NOT Required

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ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-956-309-1 through '-318-1	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application

RECEIVED

San Joaquin Valley Air Pollution Control District

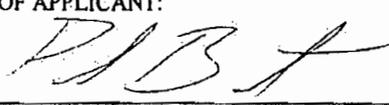
APR 26 2012

www.valleyair.org

Permits Srvc
SJVAPCD

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: The Wine Group, LLC dba Franzia Winery	
2. MAILING ADDRESS: STREET/P.O. BOX: 17000 E. Hwy 120 CITY: Ripon STATE: CA 9-DIGIT ZIP CODE: 95336	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 17000 E. Hwy 120 CITY: Ripon ¼ SECTION TOWNSHIP RANGE	INSTALLATION DATE: 1974
4. GENERAL NATURE OF BUSINESS: Winery	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Ten (10) high-proof tanks were overlooked during original permitting action for tanks in 2005 and need to be grandfathered in. All tanks were in use prior to 2005. 1 @ 2,853 gallons, 1 @ 5,071 gallons, 2 @ 7,528 gallons, 2 @ 13,504 gallons, 2 @ 54,639 gallons, 1 @ 106,274 gallons, 1 @ 127,781 gallons	
6. TYPE OR PRINT NAME OF APPLICANT: Paul Bement	TITLE OF APPLICANT: Environmental Engineer
7. SIGNATURE OF APPLICANT: 	DATE: 4/23/2012 PHONE: (209) 253-5206 FAX: (209) 559-4217 EMAIL: paul.bement@thewinegroup.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>N-1120976</u> FACILITY ID: <u>N-956</u>

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: The Wine Group, LLC dba Franzia Winery	FACILITY ID: N-956
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: The Wine Group, LLC dba Franzia Winery	
3. Agent to the Owner: Lon Nebiolini	

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

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

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

Lon Nebiolini
Signature of Responsible Official

4/25/12
Date

LAN NEBIOLINI
Name of Responsible Official (please print)

GENERAL MANAGER - FRANZIA WINERY
Title of Responsible Official (please print)