



AUG 29 2012

Mr. Paul Bement  
The Wine Group  
17000 E Highway 120  
Ripon, CA 95366

**Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)  
District Facility # N-956  
Project # N-1113928**

Dear Mr. Bement:

The Air Pollution Control Officer has issued Authorities to Construct (N-956-275-0 to ' -278-0) with Certificates of Conformity to The Wine Group at 17000 E Highway 120, Ripon. This project is to install four 3,500 gallon (each) stainless steel wine fermentation and storage tanks.

Enclosed are the Authorities to Construct. The application and proposal were sent to US EPA Region IX on April 24, 2012. All comments received have been addressed by the District. A summary of the comments and the District's response to each comment is included as an attachment to this letter.

The notice of final decision for this project will be published approximately three days from the date of this letter.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Enclosed is an invoice for the engineering evaluation fees. Please remit the amount owed, along with a copy of the attached invoice, within 30 days.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,



David Warner  
Director of Permit Services

DW:JK/st

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



AUG 29 2012

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

**Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)  
District Facility # N-956  
Project # N-1113928**

Dear Mr. Rios:

The Air Pollution Control Officer has issued Authorities to Construct (N-956-275-0 to N-956-278-0) with Certificates of Conformity to The Wine Group at 17000 E Highway 120, Ripon. This project is to install four 3,500 gallon (each) stainless steel wine fermentation and storage tanks.

Enclosed is a copy of the Authorities to Construct. The application and proposal were sent to US EPA Region IX on April 24, 2012. All comments received have been addressed by the District. A summary of the comments and the District's response to each comment is included as an attachment to this letter.

The notice of final decision for this project will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,



David Warner  
Director of Permit Services

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AUG 29 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Final - Authority to Construct / Certificate of Conformity (Significant Mod)  
District Facility # N-956  
Project # N-1113928**

Dear Mr. Tollstrup:

The Air Pollution Control Officer has issued Authorities to Construct (N-956-275-0 to '1-278-0) with Certificates of Conformity to The Wine Group at 17000 E Highway 120, Ripon. This project is to install four 3,500 gallon (each) stainless steel wine fermentation and storage tanks.

Enclosed is a copy of the Authorities to Construct. The application and proposal were sent to US EPA Region IX on April 24, 2012. All comments received have been addressed by the District. A summary of the comments and the District's response to each comment is included as an attachment to this letter.

The notice of final decision for this project will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

DW:JK/st

Enclosures

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Executive Director/Air Pollution Control Officer

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Tel: 661-392-5500 FAX: 661-392-5585

**NOTICE OF FINAL DECISION  
FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT AND  
THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY  
MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue Authorities to Construct to The Wine Group for winery located at 17000 E Highway 120, Ripon, California. This project is to install four 3,500 gallon (each) stainless steel wine fermentation and storage tanks.

The District's analysis of the legal and factual basis for this proposed action, project #N-1113928, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356-8718.

## Response to the Comments from U.S. EPA

### **Comment 1:**

This project proposes to install 4 new 3,500 gallon stainless steel wine fermentation and storage tanks. EPA notes that the proposed permits only contain annual emission limits for the facility, rather than enforceable daily or 12-month rolling basis emission limits. While Rule 2201 does not contain a specific monthly recordkeeping requirement, Section 5.7.2 requires a permit to “include daily emission limitations and other enforceable conditions which reflect applicable emission limits including the offset requirements.” Since these annual emission limits are not practically enforceable without a 12 month rolling basis emission limit, the proposed permits must be revised to include daily and/or 12-month rolling basis emission limits pursuant to Rule 2201, Section 5.7.2.

Please add the necessary conditions to each permit to address this issue. In addition, whenever the District has Title V permits open for other wineries, (and no later than upon Title V permit renewal), the District must revise these permits to include recordkeeping on at least a 12-month rolling basis to make the permit conditions practically enforceable.

### **Response:**

The facility has proposed to calculate annual VOC emissions from the fermentation and storage emissions on a 12-month rolling basis. Therefore, conditions #14 and 18 of the proposed draft permits have been revised. These conditions are stated as follows:

14. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility, calculated on a rolling 12-month total basis, shall not exceed 581,212 lb. [District Rule 2201]
  
18. Records of the 12-month rolling total fermentation and total storage emissions, including calculation methods and parameters used, shall be maintained and updated monthly. [District Rules 1070 and 2201]

## Response to the Comments from Air Resources Board (ARB)

No comments are received from ARB.

## Response to the Comments from the Public

No comments are received from the public.



## AUTHORITY TO CONSTRUCT

PERMIT NO: N-956-275-0

ISSUANCE DATE: 08/27/2012

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:**

3,500 GALLON STAINLESS STEEL RED AND WHITE WINE FERMENTATION AND STORAGE TANK #9000 WITH INSULATION (OR PLACED INDOORS IN A CLIMATE CONTROLLED BUILDING OR EQUIVALENT) AND PRESSURE/VACUUM VALVE

### CONDITIONS

1. 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. 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. The daily VOC emissions rate for red wine fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The daily VOC emissions rate for white wine fermentation shall not exceed 1.62 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [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 / APD

DAVID WARNER, Director of Permit Services  
N-956-275-0; Aug 27, 2012 3:15PM - KAHLOUJ - Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
10. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
11. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
12. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694, 6.4.2]
13. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility, calculated on a rolling 12-month total basis, shall not exceed 581,212 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records of the 12-month rolling total fermentation and total storage emissions, including calculation methods and parameters used, shall be maintained and updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-956-276-0

**ISSUANCE DATE:** 08/27/2012

**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:**

3,500 GALLON STAINLESS STEEL RED AND WHITE WINE FERMENTATION AND STORAGE TANK #9001 WITH INSULATION (OR PLACED INDOORS IN A CLIMATE CONTROLLED BUILDING OR EQUIVALENT) AND PRESSURE/VACUUM VALVE

### CONDITIONS

1. 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. 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. The daily VOC emissions rate for red wine fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The daily VOC emissions rate for white wine fermentation shall not exceed 1.62 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [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 Saadedin, Executive Director, APCD

DAVID WARNER, Director of Permit Services

N-956-276-0 : Aug 27 2012 3:16PM - KAHLOUJ : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
10. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
11. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
12. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694, 6.4.2]
13. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility, calculated on a rolling 12-month total basis, shall not exceed 581,212 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records of the 12-month rolling total fermentation and total storage emissions, including calculation methods and parameters used, shall be maintained and updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-956-277-0

**ISSUANCE DATE:** 08/27/2012

**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:**

3,500 GALLON STAINLESS STEEL RED AND WHITE WINE FERMENTATION AND STORAGE TANK #9002 WITH INSULATION (OR PLACED INDOORS IN A CLIMATE CONTROLLED BUILDING OR EQUIVALENT) AND PRESSURE/VACUUM VALVE

### CONDITIONS

1. 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. 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
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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

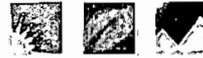
DAVID WARNER, Director of Permit Services

N-956-277-0 / 08/27/2012 3:15 PM - KAHLOUJ : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit
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12. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694, 6.4.2]
13. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility, calculated on a rolling 12-month total basis, shall not exceed 581,212 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
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18. Records of the 12-month rolling total fermentation and total storage emissions, including calculation methods and parameters used, shall be maintained and updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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20. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-956-278-0

**ISSUANCE DATE:** 08/27/2012

**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:**

3,500 GALLON STAINLESS STEEL RED AND WHITE WINE FERMENTATION AND STORAGE TANK #9003 WITH INSULATION (OR PLACED Indoors IN A CLIMATE CONTROLLED BUILDING OR EQUIVALENT) AND PRESSURE/VACUUM VALVE

### CONDITIONS

1. 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. 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. The daily VOC emissions rate for red wine fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The daily VOC emissions rate for white wine fermentation shall not exceed 1.62 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit

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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 Saadedin, Executive Director / ABCO

DAVID WARNER, Director of Permit Services

N-956-278-0 : 08/27/2012 3:15PM - KAHLOAN : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
10. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
11. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
12. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694, 6.4.2]
13. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility, calculated on a rolling 12-month total basis, shall not exceed 581,212 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records of the 12-month rolling total fermentation and total storage emissions, including calculation methods and parameters used, shall be maintained and updated monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit