



AUG 15 2016

Mr. Ken Putnam
CBUSO dba Mission Bell Winery
12667 Road 24
Madera, CA 93637

**Re: Notice of Minor Title V Permit Modification
District Facility # C-628
Project # C-1162210**

Dear Mr. Putnam:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct C-628-752-3 (under project C-1162016) into the Title V operating permit. Authority to Construct C-628-752-3 was issued as a modification of the existing grape seed drying operation to remove the daily heat input limitation.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-628-752-3, 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.

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

Thank you for your cooperation in this matter.

Sincerely,


for Arnaud Marjolle
Director of Permit Services

Enclosures

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

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1162210

Engineer: Andrea Ogden
Date: August 9, 2016

Facility Number: C-628
Facility Name: CBUSO dba Mission Bell Winery
Mailing Address: 12667 Road 24
Madera, CA 93637

Contact Name: Ken Putnam
Phone: (559) 661-5516

Responsible Official: Ken Putnam
Title: Director, Cellar Operations

I. PROPOSAL

CBUSO dba Mission Bell Winery is proposing a Title V minor permit modification to incorporate recently issued C-628-752-3 (under project C-1162016) into the Title V operating permit. Authority to Construct C-628-752-3 was issued as a modification of the existing grape seed drying operation to remove the daily heat input limitation.

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

II. FACILITY LOCATION

The facility is located at 12667 Road 24, Madera, CA.

III. EQUIPMENT DESCRIPTION

C-628-752-4: GRAPE SEED DRYING OPERATION CONSISTING OF DELUX MFG CO NATURAL GAS-FIRED TOWER GRAIN DRYER WITH A 7.3 MMBTU/HR DELUX MFG MODEL 24 ½" NOVA BURNER SYSTEM

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 primary business of CBUSO dba Mission Bell Winery (Mission Bell) is the manufacturing of wine. Mission Bell has submitted an Authority to Construct (ATC) application for the following:

- Modification of the existing grape seed drying operation, permit C-628-752-1, to remove the daily heat input limitation. (see Appendix E for the current permit)

This modification is requested to replace grape seed drying capacity previously handled by a third party. This modification will result in an increase in daily emissions; however, annual emissions will not increase.

ATC condition 1 was not included on the current Permit to Operate. This condition was satisfied by submitting the application associated with this project and as such is no longer an applicable requirement.

Permit condition 6 was modified to remove the 32 MMBtu/day fuel heat input limit.

Permit condition 11 was removed from the current Permit to Operate. This condition required the permittee to keep daily records of fuel used in the unit to ensure compliance with the daily usage limit previously stated in condition 6. This permit condition is no longer applicable and therefore was not included on the proposed Permit to Operate.

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
- B. Authorities to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-628-752-4

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

GRAPE SEED DRYING OPERATION CONSISTING OF DELUX MFG CO NATURAL GAS-FIRED TOWER GRAIN DRYER WITH A 7.3 MMBTU/HR DELUX MFG CO MODEL 24 1/2" NOVA BURNER SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The unit shall only be fired on PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. A non-resettable, totalizing mass or volumetric fuel flow meter shall be installed on the fuel line to the dryer burners. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Merced County Rule 407] Federally Enforceable Through Title V Permit
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 0.05 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.051 lb-CO/MMBtu, or 0.0141 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The total heat input shall not exceed 3,660 MMBtu/yr during any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Visible emissions shall be observed once per calendar quarter during operation. Any indication of potential visible emissions in excess of the limits of Rule 4101 shall be corrected within 24 hours. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Permittee shall keep a record of the rolling 12-month heat input of the unit. This record shall be updated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authority to Construct



AUTHORITY TO CONSTRUCT

PERMIT NO: C-628-752-3

ISSUANCE DATE: 08/02/2016

LEGAL OWNER OR OPERATOR: CBUS OPS DBA MISSION BELL WINERY

MAILING ADDRESS: 12667 ROAD 24
MADERA, CA 93637

LOCATION: 12667 ROAD 24
MADERA, CA 93637

EQUIPMENT DESCRIPTION:

MODIFICATION OF GRAPE SEED DRYING OPERATION CONSISTING OF DELUX MFG CO NATURAL GAS-FIRED TOWER GRAIN DRYER WITH A 7.3 MMBTU/HR DELUX MFG MODEL 24 1/2" NOVA BURNER SYSTEM: REMOVE DAILY HEAT INPUT LIMIT

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter shall be installed on the fuel line to the dryer burners. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Merced County Rule 407] Federally Enforceable Through Title V Permit
6. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 0.05 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.051 lb-CO/MMBtu, or 0.0141 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The total heat input shall not exceed 3,660 MMBtu/yr during any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

C-628-752-3 Aug 2 2016 8:39AM - GARCIAJ Joint Inspection NOT Required

8. Visible emissions shall be observed once per calendar quarter during operation. Any indication of potential visible emissions in excess of the limits of Rule 4101 shall be corrected within 24 hours. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Permittee shall keep a record of the rolling 12-month heat input of the unit. This record shall be updated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2201] Federally Enforceable Through Title V Permit
12. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-628-752-3	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



RECEIVED

AUG 03 2016

Permits Services
SJVAPCD

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: CBUSO DBA MISSION BELL WINERY	
2. MAILING ADDRESS: STREET/P.O. BOX: 12667 Road 24 CITY: Madera STATE: CA 9-DIGIT ZIP CODE: 93637	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 12667 Road 24 CITY: Madera 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: Modification start-up 8/3/2016
4. GENERAL NATURE OF BUSINESS: Wine Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Convert into Title V Permit: ATC C-628-752-3: MODIFICATION OF GRAPE SEED DRYING OPERATION CONSISTING OF DELUX MFG CO NATURAL GAS-FIRED TOWER GRAIN DRYER WITH A 7.3 MMBTU/HR DELUX MFG MODEL 24 W NOVA BURNER SYSTEM: REMOVE DAILY HEAT INPUT LIMIT	
6. TYPE OR PRINT NAME OF APPLICANT: Ken Putnam	TITLE OF APPLICANT: Director, Cellar Operations
7. SIGNATURE OF APPLICANT: 	DATE: 8/2/16 PHONE: (559) 661-5516 FAX: (559) 916-4296 EMAIL: ken.putnam@cbrands.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ ⓪ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: C-1162210 FACILITY ID: C-628



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 AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: <u>CBUSO DBA MISSION Bell Winery</u>	FACILITY ID: <u>C-628</u>
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:	
3. Agent to the Owner: <u>CINDY XIONG</u>	

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

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

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

Ken Putnam
Signature of Responsible Official

8/2/16
Date

KEN PUTNAM
Name of Responsible Official (please print)

DIRECTOR, CELLAR OPERATIONS
Title of Responsible Official (please print)

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

Certification of Truth and Accuracy

Company Name:	Facility ID: -
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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:

Ken Putnam
Signature of Responsible Official

8/2/16
Date

KEN PUTNAM
Name of Responsible Official (please print)

DIRECTOR, CELLAR OPERATIONS
Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-628-752-1

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

GRAPE SEED DRYING OPERATION CONSISTING OF DELUX MFG CO NATURAL GAS-FIRED TOWER GRAIN DRYER WITH A 7.3 MMBTU/HR DELUX MFG CO MODEL 24 ½" NOVA BURNER SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. The unit shall only be fired on PUC regulated natural gas. [District Rule 2201]
3. A non-resettable, totalizing mass or volumetric fuel flow meter shall be installed on the fuel line to the dehydrator burners. [District Rule 2201]
4. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Merced County Rule 407]
5. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 0.05 lb-NOX/MMBtu, 0.00285 lb-SOX/MMBtu, 0.0076 lb-PM10/MMBtu, 0.051 lb-CO/MMBtu, or 0.0141 lb-VOC/MMBtu. [District Rule 2201]
6. The total heat input shall not exceed 32 MMBtu/day and 3,660 MMBtu/yr during any one rolling 12-month period. [District Rule 2201]
7. Visible emissions shall be observed once per calendar quarter during operation. Any indication of potential visible emissions in excess of the limits of Rule 4101 shall be corrected within 24 hours. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Permittee shall keep a record of daily and the rolling 12-month heat input of the unit. This record shall be updated on a monthly basis. [District Rule 2201]
9. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC regulated natural gas. [District Rule 2201]
10. Operator shall maintain copies of all fuel invoices and supplier certifications. [District Rule 2201]
11. The permittee shall maintain records of the daily fuel usage and heating value of fuel used in this unit. [District Rule 2201]
12. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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