

JUL 29 2016

Mr. Dan Martin
E&J Gallo Winery - Livingston
18000 W. River Road
Livingston, CA 95334

**Re: Notice of Significant Title V Permit Modification
District Facility # N-1237
Project # N-1141979**

Dear Mr. Martin:

Enclosed for your review is the District's analysis of an application for significant Title V permit modification for the facility identified above. E&J Gallo Winery - Livingston is proposing a Title V significant permit modification to incorporate the recently issued Authorities to Construct N-1237-605-0 and -606-0 (under project N-1121959) into the Title V operating permit (see enclosures). These Authorities to Construct (ATC) permits were issued for the installation of two cogeneration (heat and electric) systems each equipped with 1,393 bhp Cummins Model QSK60G lean burn digester gas-fired internal combustion (IC) engine.

Enclosed are the current Title V permit, recently issued Authorities to Construct N-1237-605-0 and -606-0, proposed modified Title V permit, engineering evaluation, and application. The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the modified Title V operating permit. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice.

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

Mr. Dan Martin
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,

A handwritten signature in blue ink that reads "Arnaud Marjollet". The signature is written in a cursive style and is positioned above a horizontal line.

Arnaud Marjollet
Director of Permit Services

Enclosures

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

TITLE V APPLICATION REVIEW

Significant Modification

Project #: N-1141979

Engineer: Kamaljit Sran

Date: July 15, 2016

Facility Number: N-1237
Facility Name: E & J Gallo Winery - Livingston
Mailing Address: 18000 W. River Road
Livingston, CA 95334

Contact Name: Dan Martin
Phone: (209) 394-6211

Responsible Official: Dan Martin
Title: Plant Manager - Livingston Winery

I. PROPOSAL

E & J Gallo Winery is proposing a Title V significant permit modification to incorporate recently issued N-1237-605-0 and -606-0 (under project N-1121959) into the Title V operating permit. These Authorities to Construct (ATC) permits were issued for the installation of two cogeneration (heat and electric) systems each equipped with 1,393 bhp Cummins Model QSK60G lean burn digester gas-fired internal combustion (IC) engine.

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 18000 W River Rd in Livingston, CA.

III. EQUIPMENT DESCRIPTION

ATC N-1237-605-0: 1,393 BHP CUMMINS MODEL QSK60G LEAN BURN DIGESTER GASFIRED IC ENGINE WITH TURBOCHARGER, INTERCOOLER, AIR/FUEL RATIO CONTROLLER, NON-SELECTIVE CATALYTIC REDUCTION AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION COGENERATION SYSTEM SERVED BY A TWO PHASE SULFUR SCRUBBER

SYSTEM CONSISTING OF ONE LIQUID BIOLOGICAL OXIDATION WET SCRUBBER AND TWO ACTIVATED CARBON ADSORPTION POLISHING FILTERS SHARED WITH PERMIT N-1237-606.

ATC N-1237-606-0: 1,393 BHP CUMMINS MODEL QSK60G LEAN BURN DIGESTER GASFIRED IC ENGINE WITH TURBOCHARGER, INTERCOOLER, AIR/FUEL RATIO CONTROLLER, NON-SELECTIVE CATALYTIC REDUCTION AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION COGENERATION SYSTEM SERVED BY A TWO PHASE SULFUR SCRUBBER SYSTEM CONSISTING OF ONE LIQUID BIOLOGICAL OXIDATION WET SCRUBBER AND TWO ACTIVATED CARBON ADSORPTION POLISHING FILTERS SHARED WITH PERMIT N-1237-605.

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a significant modification because the applicant did not originally apply for a Certificate of Conformity (COC) with the original New Source Review (NSR) Authorities to Construct (ATCs). As such, this project requires public review.

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

E & J Gallo Winery is proposing to construct and operate a digester gas operation at the existing winery in Livingston, CA. The project will be a wastewater treatment and energy recovery project called Livingston Water Innovation and Energy (L-WINE).

Anaerobic digestion of winery and distillery wastewater and pomace will create digester gas. The digester gas will be used by two cogeneration engines that will produce electricity and heat. The produced heat from the engines will be recovered to aid in the digestion process. The digester operation will operate 24 hours per day and 365 days per year.

VII. COMPLIANCE

District Rule 2520, Section 6.0 describes the source's ability to make changes including significant permit modification. This modification does not meet the minor permit modification criteria pursuant to Section 3.20 described as follows.

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 11.3 by including;

1. The identification of the source, the name and address of the permit holder, the activities and emissions change involved in the permit action;
2. The name and address of the District, the name and telephone number of District staff to contact for additional information;
3. The availability, upon request, of a statement that sets forth the legal and factual basis for the proposed permit conditions;
4. The location where the public may inspect the complete application, the District analysis, the proposed permit, and all relevant supporting materials;
5. A statement that the public may submit written comments regarding the proposed decision within at least 30 days from the date of publication and a brief description of commenting procedures, and
6. A statement that members of the public may request the APCO or his designee to preside over a public hearing for the purpose of receiving oral public comment, if a hearing has not already been scheduled. The

APCO shall provide notice of any public hearing scheduled to address the proposed decision at least 30 days prior to such hearing;

VIII. ATTACHMENTS

- A. Proposed Title V Operating Permit No.'s N-1237-605-1 and -606-1.
- B. Authorities to Construct No.'s N-1237-605-0 and -606-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Title V Operating Permit No.'s
N-1237-605-1 and -606-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1237-605-1

EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:

1,393 BHP CUMMINS MODEL QSK60G LEAN BURN DIGESTER GAS-FIRED IC ENGINE WITH TURBOCHARGER, INTERCOOLER, AIR/FUEL RATIO CONTROLLER, AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION COGENERATION SYSTEM SERVED BY A TWO PHASE SULFUR SCRUBBER SYSTEM CONSISTING OF ONE LIQUID BIOLOGICAL OXIDATION WET SCRUBBER AND TWO ACTIVATED CARBON ADSORPTION POLISHING FILTERS SHARED WITH PERMIT N-1237-606

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. 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
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. The unit shall only be fired on digester gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Only one activated carbon unit need be operated at any one time. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall be operated and maintained in proper operating condition according to the manufacturer's specifications. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
10. Air-to-fuel ratio controller(s) shall be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
11. This engine shall be equipped with a nonresettable elapsed operating time meter or other APCO approved alternative. [District Rules 2201 and 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
12. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Operation of the engine shall not exceed 8,400 hours/year. [District Rule 2201] 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.

14. Emissions from the IC engine when fired on digester gas shall not exceed any of the following limits: 0.15 g-NOx/bhp-hr, 0.025 g-SOx/bhp-hr (based on 40 ppmv sulfur content in fuel (as H₂S)), 0.033 g-PM₁₀/bhp-hr, 0.8 g-CO/bhp-hr, or 0.10 g-VOC/bhp-hr. [District Rules 2201 and 4702, and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
15. The ammonia (NH₃) emission concentration shall not exceed 10 ppmvd @ 15% O₂. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
16. Source testing to measure digester gas fuel combustion NO_x, CO, VOC and ammonia emissions from this unit shall be conducted once every 8,760 hours of operation or 24 months, whichever comes first, thereafter. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
17. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18 or 25A or 25B or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
18. Source testing for ammonia slip shall be conducted utilizing BAAQMD method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NO_x and O₂ at least once every day (in which a source test is not performed). NO_x and O₂ concentrations shall be performed using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702 and 40 CFR 64] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of CO and NH₃ at least once every month (in which a source test is not performed). CO concentrations shall be performed using a portable emission monitor that meets District specifications. NH₃ monitoring shall be conducted utilizing District approved gas-detection tubes or a District approved equivalent method. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
21. If the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, or the NH₃ concentrations corrected to 15% O₂, as measured by District approved gas-detection tubes, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] 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.

23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, O₂, and NH₃ measurements, (2) the O₂ concentration in percent and the measured NO_x, CO, and NH₃ concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
24. The sulfur content of the digester gas combusted in this engine shall be monitored and recorded weekly. After eight (8) consecutive weekly tests show compliance, the digester gas sulfur content monitoring frequency may be reduced to once every calendar quarter. If quarterly monitoring shows a violation of the digester gas sulfur content limit of this permit, then weekly monitoring shall resume and continue until eight consecutive weeks of monitoring show compliance with the gas sulfur content limit. Once compliance with the gas sulfur content limit is shown for eight consecutive weeks, then the monitoring frequency may return to quarterly. Monitoring of the sulfur content of the digester gas shall not be required if the engine does not operate during that period. Records of the results of monitoring of the digester gas sulfur content shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Monitoring of the digester gas sulfur content shall be performed using a Testo 350 XL portable emission monitor; District-approved in-line H₂S monitors; gas detection tubes calibrated for H₂S; District-approved source test methods, including EPA Method 11 or EPA Method 15, ASTM Method D1072, D4084, and D5504; or an alternative method approved by the District. Prior to utilization of in-line monitors to demonstrate compliance with the digester gas sulfur content limit of this permit, the permittee shall submit details of the proposed monitoring system, including the make, model, and detection limits, to the District and obtain District approval for the proposed monitor(s). [District Rule 2201] Federally Enforceable Through Title V Permit
26. Sampling ports for digester gas testing shall be provided in accordance with District requirements. [District Rule 1081] Federally Enforceable Through Title V Permit
27. For initial emissions source testing, the arithmetic average of three 60-consecutive-minute test runs shall apply. Each test run shall be conducted within 10 percent of 100 percent peak (or the highest achievable) load. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. NO_x, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
29. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
30. The results of each source test shall be submitted to the District and EPA within 60 days after completion of the source test. [District Rule 1081 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
31. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] 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.

33. Notification of the date construction of this engine commenced shall be submitted to the District and EPA and shall be postmarked no later than 30 days after such date as construction commenced. The notification shall contain the following information: 1) Name and address of the owner or operator; 2) The address of the affected source; 3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; 4) Emission control equipment; and 5) Fuel used. [40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
34. 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 Rule 4702] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1237-606-1

EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:

1,393 BHP CUMMINS MODEL QSK60G LEAN BURN DIGESTER GAS-FIRED IC ENGINE WITH TURBOCHARGER, INTERCOOLER, AIR/FUEL RATIO CONTROLLER, AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION COGENERATION SYSTEM SERVED BY A TWO PHASE SULFUR SCRUBBER SYSTEM CONSISTING OF ONE LIQUID BIOLOGICAL OXIDATION WET SCRUBBER AND TWO ACTIVATED CARBON ADSORPTION POLISHING FILTERS SHARED WITH PERMIT N-1237-605

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. 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
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. The unit shall only be fired on digester gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Only one activated carbon unit need be operated at any one time. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall be operated and maintained in proper operating condition according to the manufacturer's specifications. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
10. Air-to-fuel ratio controller(s) shall be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
11. This engine shall be equipped with a nonresettable elapsed operating time meter or other APCO approved alternative. [District Rules 2201 and 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
12. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Operation of the engine shall not exceed 8,400 hours/year. [District Rule 2201] 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.

14. Emissions from the IC engine when fired on digester gas shall not exceed any of the following limits: 0.15 g-NO_x/bhp-hr, 0.025 g-SO_x/bhp-hr (based on 40 ppmv sulfur content in fuel (as H₂S)), 0.033 g-PM₁₀/bhp-hr, 0.8 g-CO/bhp-hr, or 0.10 g-VOC/bhp-hr. [District Rules 2201 and 4702, and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
15. The ammonia (NH₃) emission concentration shall not exceed 10 ppmvd @ 15% O₂. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
16. Source testing to measure digester gas fuel combustion NO_x, CO, VOC and ammonia emissions from this unit shall be conducted once every 8,760 hours of operation or 24 months, whichever comes first, thereafter. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
17. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18 or 25A or 25B or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
18. Source testing for ammonia slip shall be conducted utilizing BAAQMD method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NO_x and O₂ at least once every day (in which a source test is not performed). NO_x and O₂ concentrations shall be performed using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702 and 40 CFR 64] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of CO and NH₃ at least once every month (in which a source test is not performed). CO concentrations shall be performed using a portable emission monitor that meets District specifications. NH₃ monitoring shall be conducted utilizing District approved gas-detection tubes or a District approved equivalent method. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
21. If the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, or the NH₃ concentrations corrected to 15% O₂, as measured by District approved gas-detection tubes, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] 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.

23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, O₂, and NH₃ measurements, (2) the O₂ concentration in percent and the measured NO_x, CO, and NH₃ concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
24. The sulfur content of the digester gas combusted in this engine shall be monitored and recorded weekly. After eight (8) consecutive weekly tests show compliance, the digester gas sulfur content monitoring frequency may be reduced to once every calendar quarter. If quarterly monitoring shows a violation of the digester gas sulfur content limit of this permit, then weekly monitoring shall resume and continue until eight consecutive weeks of monitoring show compliance with the gas sulfur content limit. Once compliance with the gas sulfur content limit is shown for eight consecutive weeks, then the monitoring frequency may return to quarterly. Monitoring of the sulfur content of the digester gas shall not be required if the engine does not operate during that period. Records of the results of monitoring of the digester gas sulfur content shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Monitoring of the digester gas sulfur content shall be performed using a Testo 350 XL portable emission monitor; District-approved in-line H₂S monitors; gas detection tubes calibrated for H₂S; District-approved source test methods, including EPA Method 11 or EPA Method 15, ASTM Method D1072, D4084, and D5504; or an alternative method approved by the District. Prior to utilization of in-line monitors to demonstrate compliance with the digester gas sulfur content limit of this permit, the permittee shall submit details of the proposed monitoring system, including the make, model, and detection limits, to the District and obtain District approval for the proposed monitor(s). [District Rule 2201] Federally Enforceable Through Title V Permit
26. Sampling ports for digester gas testing shall be provided in accordance with District requirements. [District Rule 1081] Federally Enforceable Through Title V Permit
27. For initial emissions source testing, the arithmetic average of three 60-consecutive-minute test runs shall apply. Each test run shall be conducted within 10 percent of 100 percent peak (or the highest achievable) load. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. NO_x, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
29. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
30. The results of each source test shall be submitted to the District and EPA within 60 days after completion of the source test. [District Rule 1081 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
31. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] 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.

33. Notification of the date construction of this engine commenced shall be submitted to the District and EPA and shall be postmarked no later than 30 days after such date as construction commenced. The notification shall contain the following information: 1) Name and address of the owner or operator; 2) The address of the affected source; 3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; 4) Emission control equipment; and 5) Fuel used. [40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
34. 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 Rule 4702] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authorities to Construct No.'s
N-1237-605-0 and -606-0



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-605-0

ISSUANCE DATE: 06/06/2013

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

1,393 BHP CUMMINS MODEL QSK60G LEAN BURN DIGESTER GAS-FIRED IC ENGINE WITH TURBOCHARGER, INTERCOOLER, AIR/FUEL RATIO CONTROLLER, AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION COGENERATION SYSTEM SERVED BY A TWO PHASE SULFUR SCRUBBER SYSTEM CONSISTING OF ONE LIQUID BIOLOGICAL OXIDATION WET SCRUBBER AND TWO ACTIVATED CARBON ADSORPTION POLISHING FILTERS SHARED WITH PERMIT N-1237-606

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. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantity of emissions: 1st quarter - 967 lb, 2nd quarter - 967 lb, 3rd quarter - 967 lb, and fourth quarter - 968 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 04/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 645 lb, 2nd quarter - 645 lb, 3rd quarter - 645 lb, and fourth quarter - 645 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 04/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
N-1237-605-0 - JUN 6 2013 11:13AM - TOMS : Joint Inspection NOT Required

4. ERC Certificate Numbers N-2-2, N-849-2, N-972-2, N-1010-2, N-1011-2, N-1012-2, N-2-1, S-3714-1, S-3805-1, S-3807-1, S-3808-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. 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
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. 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
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
10. The unit shall only be fired on digester gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Only one activated carbon unit need be operated at any one time. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall submit an Inspection and Monitoring (I&M) plan to the District for approval that includes all of the data required under Section 6.5 of Rule 4702 prior to installing the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
13. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
14. This engine shall be operated and maintained in proper operating condition according to the manufacturer's specifications. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
15. Air-to-fuel ratio controller(s) shall be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
16. This engine shall be equipped with a nonresettable elapsed operating time meter or other APCO approved alternative. [District Rules 2201 and 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
17. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Operation of the engine shall not exceed 8,400 hours/year. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emissions from the IC engine when fired on digester gas shall not exceed any of the following limits: 0.15 g-NOx/bhp-hr, 0.025 g-SOx/bhp-hr (based on 40 ppmv sulfur content in fuel (as H₂S)), 0.033 g-PM₁₀/bhp-hr, 0.8 g-CO/bhp-hr, or 0.10 g-VOC/bhp-hr. [District Rules 2201 and 4702, and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
20. The ammonia (NH₃) emission concentration shall not exceed 10 ppmvd @ 15% O₂. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Source testing to measure digester gas fuel combustion NO_x, CO, VOC and ammonia emissions from this unit shall be conducted within 60 days of initial start-up and once every 8,760 hours of operation or 24 months, whichever comes first, thereafter. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18 or 25A or 25B or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
23. Source testing for ammonia slip shall be conducted utilizing BAAQMD method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NO_x and O₂ at least once every day (in which a source test is not performed). NO_x and O₂ concentrations shall be performed using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702 and 40 CFR 64] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the stack concentration of CO and NH₃ at least once every month (in which a source test is not performed). CO concentrations shall be performed using a portable emission monitor that meets District specifications. NH₃ monitoring shall be conducted utilizing District approved gas-detection tubes or a District approved equivalent method. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
26. If the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, or the NH₃ concentrations corrected to 15% O₂, as measured by District approved gas-detection tubes, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of: (1) the date and time of NO_x, CO, O₂, and NH₃ measurements, (2) the O₂ concentration in percent and the measured NO_x, CO, and NH₃ concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
29. The sulfur content of the digester gas combusted in this engine shall be monitored and recorded weekly. After eight (8) consecutive weekly tests show compliance, the digester gas sulfur content monitoring frequency may be reduced to once every calendar quarter. If quarterly monitoring shows a violation of the digester gas sulfur content limit of this permit, then weekly monitoring shall resume and continue until eight consecutive weeks of monitoring show compliance with the gas sulfur content limit. Once compliance with the gas sulfur content limit is shown for eight consecutive weeks, then the monitoring frequency may return to quarterly. Monitoring of the sulfur content of the digester gas shall not be required if the engine does not operate during that period. Records of the results of monitoring of the digester gas sulfur content shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. Monitoring of the digester gas sulfur content shall be performed using a Testo 350 XL portable emission monitor; District-approved in-line H₂S monitors; gas detection tubes calibrated for H₂S; District-approved source test methods, including EPA Method 11 or EPA Method 15, ASTM Method D1072, D4084, and D5504; or an alternative method approved by the District. Prior to utilization of in-line monitors to demonstrate compliance with the digester gas sulfur content limit of this permit, the permittee shall submit details of the proposed monitoring system, including the make, model, and detection limits, to the District and obtain District approval for the proposed monitor(s). [District Rule 2201] Federally Enforceable Through Title V Permit
31. Sampling ports for digester gas testing shall be provided in accordance with District requirements. [District Rule 1081] Federally Enforceable Through Title V Permit
32. For initial emissions source testing, the arithmetic average of three 60-consecutive-minute test runs shall apply. Each test run shall be conducted within 10 percent of 100 percent peak (or the highest achievable) load. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. NO_x, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
33. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
34. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
35. The results of each source test shall be submitted to the District and EPA within 60 days after completion of the source test. [District Rule 1081 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
36. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
37. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
38. Notification of the date construction of this engine commenced shall be submitted to the District and EPA and shall be postmarked no later than 30 days after such date as construction commenced. The notification shall contain the following information: 1) Name and address of the owner or operator; 2) The address of the affected source; 3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; 4) Emission control equipment; and 5) Fuel used. [40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
39. 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 Rule 4702] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-606-0

ISSUANCE DATE: 06/06/2013

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

1,393 BHP CUMMINS MODEL QSK60G LEAN BURN DIGESTER GAS-FIRED IC ENGINE WITH TURBOCHARGER, INTERCOOLER, AIR/FUEL RATIO CONTROLLER, AND SELECTIVE CATALYTIC REDUCTION WITH AMMONIA INJECTION COGENERATION SYSTEM SERVED BY A TWO PHASE SULFUR SCRUBBER SYSTEM CONSISTING OF ONE LIQUID BIOLOGICAL OXIDATION WET SCRUBBER AND TWO ACTIVATED CARBON ADSORPTION POLISHING FILTERS SHARED WITH PERMIT N-1237-605

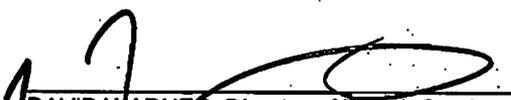
CONDITIONS

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. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantity of emissions: 1st quarter - 967 lb, 2nd quarter - 967 lb, 3rd quarter - 967 lb, and fourth quarter - 968 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 04/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 645 lb, 2nd quarter - 645 lb, 3rd quarter - 645 lb, and fourth quarter - 645 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 04/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
N-1237-606-0: JUN 6 2013 11:13AM - TOMS : Joint Inspection NOT Required

4. ERC Certificate Numbers N-2-2, N-849-2, N-972-2, N-1010-2, N-1011-2, N-1012-2, N-2-1, S-3714-1, S-3805-1, S-3807-1, S-3808-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. 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
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. 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
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
10. The unit shall only be fired on digester gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Only one activated carbon unit need be operated at any one time. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall submit an Inspection and Monitoring (I&M) plan to the District for approval that includes all of the data required under Section 6.5 of Rule 4702 prior to installing the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
13. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
14. This engine shall be operated and maintained in proper operating condition according to the manufacturer's specifications. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
15. Air-to-fuel ratio controller(s) shall be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. [District Rule 2201 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
16. This engine shall be equipped with a nonresettable elapsed operating time meter or other APCO approved alternative. [District Rules 2201 and 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
17. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Operation of the engine shall not exceed 8,400 hours/year. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emissions from the IC engine when fired on digester gas shall not exceed any of the following limits: 0.15 g-NOx/bhp-hr, 0.025 g-SOx/bhp-hr (based on 40 ppmv sulfur content in fuel (as H₂S)), 0.033 g-PM₁₀/bhp-hr, 0.8 g-CO/bhp-hr, or 0.10 g-VOC/bhp-hr. [District Rules 2201 and 4702, and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
20. The ammonia (NH₃) emission concentration shall not exceed 10 ppmvd @ 15% O₂. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. Source testing to measure digester gas fuel combustion NO_x, CO, VOC and ammonia emissions from this unit shall be conducted within 60 days of initial start-up and once every 8,760 hours of operation or 24 months, whichever comes first, thereafter. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18 or 25A or 25B or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
23. Source testing for ammonia slip shall be conducted utilizing BAAQMD method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NO_x and O₂ at least once every day (in which a source test is not performed). NO_x and O₂ concentrations shall be performed using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702 and 40 CFR 64] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the stack concentration of CO and NH₃ at least once every month (in which a source test is not performed). CO concentrations shall be performed using a portable emission monitor that meets District specifications. NH₃ monitoring shall be conducted utilizing District approved gas-detection tubes or a District approved equivalent method. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
26. If the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, or the NH₃ concentrations corrected to 15% O₂, as measured by District approved gas-detection tubes, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of: (1) the date and time of NO_x, CO, O₂, and NH₃ measurements, (2) the O₂ concentration in percent and the measured NO_x, CO, and NH₃ concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
29. The sulfur content of the digester gas combusted in this engine shall be monitored and recorded weekly. After eight (8) consecutive weekly tests show compliance, the digester gas sulfur content monitoring frequency may be reduced to once every calendar quarter. If quarterly monitoring shows a violation of the digester gas sulfur content limit of this permit, then weekly monitoring shall resume and continue until eight consecutive weeks of monitoring show compliance with the gas sulfur content limit. Once compliance with the gas sulfur content limit is shown for eight consecutive weeks, then the monitoring frequency may return to quarterly. Monitoring of the sulfur content of the digester gas shall not be required if the engine does not operate during that period. Records of the results of monitoring of the digester gas sulfur content shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

30. Monitoring of the digester gas sulfur content shall be performed using a Testo 350 XL portable emission monitor; District-approved in-line H₂S monitors; gas detection tubes calibrated for H₂S; District-approved source test methods, including EPA Method 11 or EPA Method 15, ASTM Method D1072, D4084, and D5504; or an alternative method approved by the District. Prior to utilization of in-line monitors to demonstrate compliance with the digester gas sulfur content limit of this permit, the permittee shall submit details of the proposed monitoring system, including the make, model, and detection limits, to the District and obtain District approval for the proposed monitor(s). [District Rule 2201] Federally Enforceable Through Title V Permit
31. Sampling ports for digester gas testing shall be provided in accordance with District requirements. [District Rule 1081] Federally Enforceable Through Title V Permit
32. For initial emissions source testing, the arithmetic average of three 60-consecutive-minute test runs shall apply. Each test run shall be conducted within 10 percent of 100 percent peak (or the highest achievable) load. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. NO_x, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
33. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
34. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
35. The results of each source test shall be submitted to the District and EPA within 60 days after completion of the source test. [District Rule 1081 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
36. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
37. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702 and 40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
38. Notification of the date construction of this engine commenced shall be submitted to the District and EPA and shall be postmarked no later than 30 days after such date as construction commenced. The notification shall contain the following information: 1) Name and address of the owner or operator; 2) The address of the affected source; 3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; 4) Emission control equipment; and 5) Fuel used. [40 CFR 60 Subpart JJJJ] Federally Enforceable Through Title V Permit
39. 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 Rule 4702] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emission Increases

Project N-1121959

Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
N-1237-605-0	3,869	645	851	20,637	2,580
N-1237-606-0	3,869	645	851	20,637	2,580

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

MAY 27 2014

Permit Application For:

Permits Services

- AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit
 - AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/~~SAVATO~~
 - AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct
 - PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate
- Administrative Amendment Permit Application- Convert ATC to PTO**

1. PERMIT TO BE ISSUED TO: E&J Gallo Winery-Livingston	
2. MAILING ADDRESS: STREET/P.O. BOX: 18000 W. River Road CITY: Livingston STATE: CA 9-DIGIT ZIP CODE: 95334	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: same as above CITY: /4 SECTION TOWNSHIP RANGE	WITHIN 1,000 FT OF A SCHOOL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO S.I.C. CODE(S) OF FACILITY (If known):
4. GENERAL NATURE OF BUSINESS: Production of wine, brandy and concentrates	INSTALL DATE: 2Q13-2Q14. Startup targeted for 2Q14. Request administrative amendment permit for 2 X 1 MW ICES and 1 flare. This is for the LVW LWINE project.
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC (If yes, please complete and attach a Compliance Certification form (TVFORM-009)?	
NA-Submitting AA permit application	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
Request administrative amendment permit application for the LVW LWINE project (2 X 1 MW ICES and 1 flare). Please see the attached table outlining the permit numbers that are subject to this administrative amendment permit applications and ERC withdrawal. These administrative amendment permit application and ERC withdrawal forms are submitted prior to the pre-startup inspection with the District. Please also see completed compliance certification (TV-9). Thank you.	
7. PERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? Please note that checking "YES" will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. NA	
<input type="checkbox"/> 3-day review <input type="checkbox"/> 10-day review <input checked="" type="checkbox"/> No review requested	

Northern Regional Office * 4800 Enterprise Way * Modesto, California 95356-8718 * (209) 557-6400 * FAX (209) 557-6475
 Central Regional Office * 1990 East Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061
 Southern Regional Office * 2700 M Street, Suite 275 * Bakersfield, California 93301-2370 * (661) 326-6900 * FAX (661) 326-6985

<p>8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If yes, ATC/PTO #: <u>N-1237</u></p> <p>9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? <i>(If "Yes" is checked, please complete the CEQA Information form)</i> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If yes, NOV/NTC #: _____</p>	<p>Optional Section</p> <p>11. DO YOU WANT TO PARTICIPATE IN EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS:</p> <p>"HEALTHY AIR LIVING (HAL)" <input type="checkbox"/> Yes, please send info</p> <p>"INSPECT" <input type="checkbox"/> Yes, please send info</p>	 
<p>12. TYPE OR PRINT NAME OF APPLICANT: Mr. Dan Martin</p>	<p>TITLE OF APPLICANT: Plant Manager-Livingston Winery</p>	
<p>13. SIGNATURE OF APPLICANT:  DATE: 4/23/14</p>	<p>PHONE #: (209) 394-6211 FAX #: E-MAIL: Dan.Martin@ejgallo.com</p>	

FOR APCD USE ONLY:

<p>DATE STAMP:</p>	<p>FILING FEE RECEIVED: \$ _____ CHECK #: _____</p> <p>DATE PAID: _____</p> <p>PROJECT #: <u>N-1141979</u> FACILITY ID: <u>N-1237</u></p>
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San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

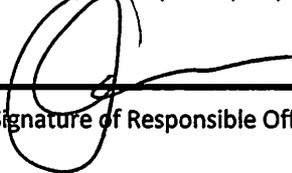
- Federal Major Permit MODIFICATION
 MINOR PERMIT MODIFICATION
- ADMINISTRATIVE
AMENDMENT

COMPANY NAME: E&J Gallo Winery - Livingston	FACILITY ID N=1237
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: E&J Gallo Winery-Livingston	
3. Agent to the Owner: Mr. Dan Martin	

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:



Signature of Responsible Official

04/23/14

Date

Mr. Dan Martin

Name of Responsible Official (please print)

Plant Manager- Livingston Winery

Title of Responsible Official (please print)