



July 21, 2016

Mr. Todd Seely
E&J Gallo Winery
600 Yosemite Blvd
Modesto, CA 95354

**Re: Notice of Minor Title V Permit Modification
District Facility # N-3386
Project # N-1161464**

Dear Mr. Seely:

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 (ATC) N-3386-493-0 (under project N-1161464) to install a 240 BHP diesel fired emergency standby IC engine powering an emergency fire pump into the Title V operating permit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC N-3386-493-0, emission increases, and application. 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. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
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 #: N-1161464

Engineer: Rupi Gill
Date: July 20, 2016

Facility Number: N-3386
Facility Name: E&J Gallo Winery
Mailing Address: 600 Yosemite Blvd
Modesto, CA 95354

Contact Name: Todd Seely
Phone: 209-341-8779

Responsible Official: William Stewart
Title: Vice President of Operations

I. PROPOSAL

E&J Gallo Winery is proposing a Title V minor permit modification to incorporate recently issued Authority to Construct N-3386-493-0 (under project N-1143553) into the Title V operating permit.

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

II. FACILITY LOCATION

The equipment is located at 600 Yosemite Blvd, Modesto, CA.

III. EQUIPMENT DESCRIPTION

ATC Description:

N-3386-493-0: 240 BHP JOHN DEERE MODEL JU6H-UFADRO TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN EMERGENCY FIRE PUMP.

Proposed TV Permit:

Revisions to the description are shown below in **bold**¹.

N-3386-493-1: 240 BHP JOHN DEERE MODEL **6068HFC48** TIER 3
CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC
ENGINE POWERING AN EMERGENCY FIRE PUMP.

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

E & J Gallo Winery received Authority to Construct (ATC) to install a 240 hp Tier 3 certified diesel-fired emergency standby internal combustion (IC) engine powering an emergency fire pump.

E & J Gallo is now proposing to incorporate the above Authority to Construct permit into the facility Title V permit.

This section details the description of the modifications to the permit conditions.

Following conditions are removed and are shown in ~~strikethrough~~:

- ~~• 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] Y~~

This application satisfies the above condition.

- ~~• Upon the implementation of this Authority to Construct, Authority to Construct N-3386-484-0 shall be canceled. [District Rule 2201] N~~

The above Authority to Construct has been cancelled.

¹ Model JU6H-UFADRO is used by Clarke Pump manufacturer. The engine model assigned by John Deere is 6068HFC48.

All relevant conditions that enforce 40 CFR 60 Subpart IIII will be revised to add rule reference pertaining to this subpart.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

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

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. N-3386-493-1
- B. Authority to Construct No. N-3386-493-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(N-3386-493-1)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3386-493-1

EXPIRATION DATE: 10/31/2019

EQUIPMENT DESCRIPTION:

240 BHP JOHN DEERE MODEL 6068HFC48 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN EMERGENCY FIRE PUMP.

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. {1898} 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]
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 2.6 g-NOx/bhp-hr, 0.6 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201, 13 CCR 2423 and 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
8. Emissions from this IC engine shall not exceed 0.08 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 13 CCR 2423 and 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
9. This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [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.

11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. 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 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct No.
(N-3386-493-0)



AUTHORITY TO CONSTRUCT

PERMIT NO: N-3386-493-0

ISSUANCE DATE: 12/19/2014

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: 600 YOSEMITE BLVD
MODESTO, CA 95354

LOCATION: 600 YOSEMITE BLVD
MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

240 BHP JOHN DEERE MODEL JU6H-UFADRO TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN EMERGENCY FIRE PUMP.

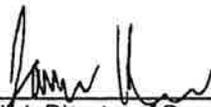
CONDITIONS

1. Upon the implementation of this Authority to Construct, Authority to Construct N-3386-484-0 shall be canceled. [District Rule 2201]
2. 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
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. 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]
6. 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]
7. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]
8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
9. Emissions from this IC engine shall not exceed any of the following limits: 2.6 g-NOx/bhp-hr, 0.6 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]

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


Arnaud Marjolet, Director of Permit Services
N-3386-493-0 : Dec 19 2014 4:06PM - GILLR : Joint Inspection NOT Required

10. Emissions from this IC engine shall not exceed 0.08 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
11. This engine shall be operated only for maintenance, testing, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
12. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
13. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-3386-493-0	138	5	32	0	4
TOTAL	138	5	32	0	4

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: E&J Gallo Winery	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>600 Yosemite Blvd</u> CITY: <u>Modesto</u> STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>95354</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>600 Yosemite Blvd</u> CITY: <u>Modesto</u> _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <u>3/3/2014</u>
4. GENERAL NATURE OF BUSINESS: Winery	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Project Nbr N1143553 Permit Number N-3386-493-0 Convert from ATC to PTO 240 BHP John Deere, model JU6H-UFADRO diesel fired emergency IC engine powering a firewater pump	
6. TYPE OR PRINT NAME OF APPLICANT: Todd Seely	TITLE OF APPLICANT: EH&S Assistant
7. SIGNATURE OF APPLICANT: 	DATE: <u>4-22-16</u> PHONE: (209) 341-8779 FAX: (209) 236-7630 EMAIL: todd.seely@ejgallo.com

For APCD Use Only:

DATE STAMP RECEIVED APR 22 2016 SJVAPCD <small>SOUTHERN REGION</small>	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>N1161464</u> FACILITY ID: <u>N-3386</u>
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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)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: E&J Gallo Winery	FACILITY ID: N- 3386
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	
3. Agent to the Owner: Matthew Hart	

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:

William Stewart

Signature of Responsible Official

JULY 21, 2016

Date

William Stewart

William Stewart
Name of Responsible Official (please print)

Vice President of Operations

Title of Responsible Official (please print)