



AUG 18 2014

Ms. Wendy Garcia
CBUS dba Turner Road Vintners
4614 West Turner Road
Lodi, CA 95242

**Re: Notice of Minor Title V Permit Modification
District Facility # N-4939
Project # N-1142763**

Dear Ms. Garcia:

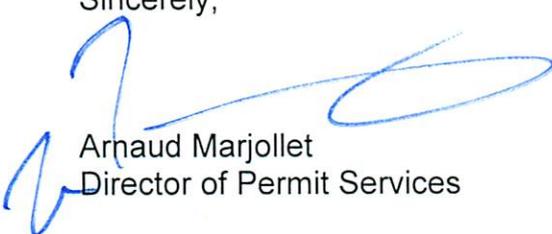
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC N-4939-373-0 into the Title V operating permit. The purpose of the project is to install a diesel-fired emergency internal combustion engine which will drive a firewater pump.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC N-4939-373-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

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-1142763

Engineer: Sandra Lowe-Leseth

Date: August 14, 2014`

Facility Number: N-4939
Facility Name: CBUS Ops dba Turner Road Vintners
Mailing Address: 4614 West Turner Road
Lodi, CA 95242

Contact Name: Wendy Garcia
Phone: (559) 661-5534

Responsible Official: Dan Hansen
Title: General Manager

I. PROPOSAL

DBUS ops dba Turner Road Vintners (Turner Road Vintners) is proposing a Title V minor permit modification to incorporate the recently issued N-4939-373-0 into the Title V operating permit. The facility has installed a emergency diesel-fired internal combustion engine powering a firewater pump.

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 4614 West Turner Road in Lodi, CA.

III. EQUIPMENT DESCRIPTION

N-4939-373-1: 175 BHP [INTERMITTENT] JOHN DEERE MODEL 6068HFG82A TIER 3 CERTIFIED DIESEL FIRED EMERGENCY IC ENGINE POWERING A FIREWATER 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

Turner Road Vintner is proposing to install a diesel-fired emergency engine to power a firewater pump.

Because this project establishes a new permit unit, there is no current Permit to Operate (PTO) for the unit. The following table compares the ATC conditions to the proposed PTO.

ATC Condition #	Condition	Proposed Condition #	Comments
1	The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520.	---	ATC condition only - Operator has submitted an application to modify the facility's Title V operating permit. Application is included in Appendix D of this document
2	No air contaminant shall be released into the atmosphere which causes a public nuisance.	---	Condition removed because it is already contained in facility-wide permit N-4939-0-2 as Condition #41
3	Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.	1	No change from ATC condition
4	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.	---	Condition removed because it is already contained in facility-wide permit N-4939-0-2 as Condition #22
5	Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used.	2	No change from ATC condition
6	This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative.	3	No change from ATC condition

This table continues on next page

ATC Condition #	Condition	Proposed Condition #	Comments
7	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.	4	No change from ATC condition
8	This engine shall be operated only for testing and maintenance of the engine, 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". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year.	5	No change from ATC condition
9	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.	6	No change from ATC condition
10	This engine shall not be operated for maintenance and testing purposes between 7:30 a.m. and 3:30 p.m. on days when school is in session.	7	No change from ATC condition
11	Emissions from this IC engine shall not exceed any of the following limits: 2.77 g-NOx/bhp-hr, 0.90 g-CO/bhp-hr, or 0.14 g-VOC/bhp-hr.	8	No change from ATC condition
12	Emissions from this IC engine shall not exceed 0.09 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure.	9	No change from ATC condition This table continues on next page

ATC Condition #	Condition	Proposed Condition #	Comments
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.	10	No change from ATC condition
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.	11	No change from ATC condition

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-4939-373-1
- B. Authority to Construct No. N-4939-373-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
N-4939-373-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4939-373-1

EXPIRATION DATE: 08/31/2019

EQUIPMENT DESCRIPTION:

175 BHP [INTERMITTENT] JOHN DEERE MODEL 6068HFG82A TIER 3 CERTIFIED DIESEL FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. 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] Federally Enforceable Through Title V Permit
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
4. 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] Federally Enforceable Through Title V Permit
5. This engine shall be operated only for testing and maintenance of the engine, 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". 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] Federally Enforceable Through Title V Permit
6. 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
7. This engine shall not be operated for maintenance and testing purposes between 7:30 a.m. and 3:30 p.m. on days when school is in session. [17 CCR 93115]
8. Emissions from this IC engine shall not exceed any of the following limits: 2.77 g-NOx/bhp-hr, 0.90 g-CO/bhp-hr, or 0.14 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed 0.09 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] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. 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-4939-373-0



COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-4939-373-0

ISSUANCE DATE: 07/16/2014

LEGAL OWNER OR OPERATOR: CBUS OPS DBA TURNER ROAD VINTNERS

MAILING ADDRESS: 4614 WEST TURNER ROAD
(EAST FACILITY)
LODI, CA 95242

LOCATION: 4614 WEST TURNER ROAD
LODI, CA 95242

EQUIPMENT DESCRIPTION:

175 BHP [INTERMITTENT] JOHN DEERE MODEL 6068HFG82A TIER 3 CERTIFIED DIESEL FIRED IC ENGINE
POWERING A FIREWATER PUMP

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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]
5. 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]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
7. 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]

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 Marjollet, Director of Permit Services
N-4939-373-0 Jul 16 2014 7:08AM - LOWELES Joint Inspection NOT Required

8. This engine shall be operated only for testing and maintenance of the engine, 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". 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]
9. 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]
10. This engine shall not be operated for maintenance and testing purposes between 7:30 a.m. and 3:30 p.m. on days when school is in session. [17 CCR 93115]
11. Emissions from this IC engine shall not exceed any of the following limits: 2.77 g-NO_x/bhp-hr, 0.90 g-CO/bhp-hr, or 0.14 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
12. Emissions from this IC engine shall not exceed 0.09 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]
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-4939-373-1	107	0	3	35	5
TOTAL	107	0	3	35	5

ATTACHMENT D

Application

RECEIVED

JUL 23 2014

San Joaquin Valley Air Pollution Control District

www.valleyair.org

JUL 23 2014

SJVUAPCD

Permit Application For:

RECEIVED

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

1. PERMIT TO BE ISSUED TO: Constellation Brands US Ops, Inc. (dba Turner Road Vintners)	
2. MAILING ADDRESS: STREET/P.O. BOX: 4614 WEST TURNER ROAD CITY: LODI STATE: CA 9-DIGIT ZIP CODE: 95242	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: SAME AS ABOVE CITY: _____ _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: Existing Equipment
4. GENERAL NATURE OF BUSINESS: WINE PRODUCTION	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Incorporate into the Title V Permit (1) 175 BHP emergency diesel fired IC Engine powering a firewater pump. ATC #N-4939-373-0 was issued for this equipment. The associated permit application and ATC engineering evaluation, which are on file with the District, contain the required supplemental information.	
6. TYPE OR PRINT NAME OF APPLICANT: WENDY GARCIA	TITLE OF APPLICANT: ENVIRONMENTAL ENGINEER
7. SIGNATURE OF APPLICANT: 	DATE: 7/21/14 PHONE: (559) 661-5534 FAX: (559) 661-3429 EMAIL: Wendy.garcia@cbrands.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED : \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: N-1142703 FACILITY ID: N-4939

TRV EMERGENCY FIRE PUMP ENGINE PERMIT APPLICATION



San Joaquin Valley Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

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

Form with fields: COMPANY NAME: CONSTELLATION BRANDS US OPS INC (CBUSO INC), FACILITY ID: N= 4939, 1. Type of Organization, 2. Owner's Name, 3. Agent to the Owner: WENDY F GARCIA

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 (Handwritten: Dan Hansen)

Date (Handwritten: 5/13/14)

DAN HANSEN

Name of Responsible Official (please print)

GENERAL MANAGER, TURNER ROAD VINTNERS

Title of Responsible Official (please print)



AUTHORITY TO CONSTRUCT

PERMIT NO: N-4939-373-0

ISSUANCE DATE: 07/16/2014

LEGAL OWNER OR OPERATOR: CBUS OPS DBA TURNER ROAD VINTNERS

MAILING ADDRESS: 4614 WEST TURNER ROAD
(EAST FACILITY)
LODI, CA 95242

LOCATION: 4614 WEST TURNER ROAD
LODI, CA 95242

EQUIPMENT DESCRIPTION:

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4. 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]
5. 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]
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7. 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]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services
N-4939-373-0 Jul 16 2014 7:05AM -- LOWELES Joint Inspection NOT Required

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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]