



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 12 2014



HEALTHY AIR LIVING™

Davindra Singh
CBUS Ops Inc (dba Woodbridge Winery)
P O Box 1260
Woodbridge, CA 95258

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: N-2321
Project Number: N-1142591

Dear Mr. Singh:

Enclosed for your review and comment is the District's analysis of CBUS Ops Inc (dba Woodbridge Winery)'s application for an Authority to Construct for existing 26 concrete wine storage tanks, at 5950 E Woodbridge Road, Acampo, California.

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 45-day EPA notice comment periods, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jag Kahlon of Permit Services at (209) 557- 6452.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM: JK

Enclosures

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

Seyed Sadredin

Executive Director/Air Pollution Control Officer

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**San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review**

Facility Name: CBUS Ops Inc (dba
Woodbridge Winery)

Date: September 10, 2014

Mailing Address: P O Box 1260
Woodbridge, CA 95258

Engineer: Jag Kahlon
Lead Engineer: Nick Peirce

Contact Person: Davindra Singh

Telephone: (209) 365-8048

Fax: (209) 365-8038

Application #(s): N-2321-808-0 to '833-0

Project #: N-1142591

Deemed Complete: August 18, 2014

I. PROPOSAL

CBUS Ops Inc (dba Woodbridge Winery) is requesting Authority to Construct (ATC) permits for four 26,470 gallon (each), twelve 30,129 gallon (each) and ten 60,259 gallon concrete wine storage tanks. VOC emissions from these tanks will be a part of the existing Specific Limiting Condition (SLC) of 1,167,178 lb-VOC/year for both fermentation and storage operations. Note that these tanks are existing tanks that were originally permitted in 2005. A few years ago, these tanks were taken out of service due to wine quality issues without physical removal of tanks from the site. Also, the facility had cancelled Permits to Operate (PTO) under the assumption they will never be using these tanks. Recently, the facility had found a way to overcome wine quality concerns and now they want to re-permit and re-use these tanks. The tanks will be treated as new emission units under District's Rule 2201 - New and Modified Stationary Source Review Rule.

This facility is a Major Source for VOC emissions. The facility is operating under Title V permit. This project triggers a public notice since the project is a Federal Major Modification per District Rule 2201, and it is a "Significant Modification" under District Rule 2520. Therefore, this project will be published in the local newspaper, Stockton Record, for public review and comment. The public comment period will last 30 days from the date of publication. The facility has also proposed to obtain ATCs with Certificate of Conformity (COC), which is EPA's 45-day review before the issuance of final ATCs. Both COC and public notice will run concurrently.

II. APPLICABLE RULES

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)

Rule 2410 Prevention of Significant Deterioration (11/26/12)

Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101 Visible Emissions (02/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4694 Wine Fermentation and Storage Tanks (12/15/05)
California Health & Safety Code 41700 (Public Nuisance)
California Health & Safety Code 42301.6 (School Notice)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

The facility is located at 5950 E Woodbridge Road, Acampo, California. This location is not within 1,000 feet of any K-12 school. Therefore, the public notice is not required under California Health & Safety Code 42301.6.

IV. PROCESS DESCRIPTION

Woodbridge Winery produces both red and white table wines, as well as other specialty wine products, from the fermentation of grapes. During the 'crush season', which typically lasts from August through November, both red and white grapes are received by truck and delivered to a crusher-stemmer that crushes the grapes and removes the stems. For red wines, the resultant juice, called "must", is pumped to red wine fermentation tanks for fermentation, a batch process. The red wine fermentation tanks are specifically designed to ferment the must and to allow the separation of the skins and seeds from the wine after fermentation. For white wines, the must is sent to screens and presses for separation of grape skins and seeds prior to entering the fermentation tank. Since the skins and seed have been separated, white wine fermentation is carried out in a tank that doesn't include design provisions for solids separation.

After transfer of the must (red or white) to the fermentation tank, the must is inoculated with yeast. This initiates the fermentation reactions. The yeast metabolizes the sugars in the must, converting the sugars to ethanol and carbon dioxide (CO₂). This process is an exothermic process, thus temperature must be controlled throughout the process. Refrigeration is used to maintain a temperature of 45-65°F for white wine fermentation and 70-95°F for red wine fermentation. The sugar content of the fermenting wine is measured in °Brix (weight %) and is typically 22-26° for unfermented wine, dropping to 4° or less by the end of fermentation process. For the wines produced at this facility, the final ethanol concentration is no greater than 20%. Batch fermentation requires 5 days per batch of red wine and 1-2 weeks per batch of white wine. VOCs are emitted during the fermentation process, along with CO₂. The VOCs are comprised primarily of ethanol along with some trace fermentation byproducts.

For white wine, the wine is directly transferred into storage tanks after completion of the fermentation process. For red wine, the grape skins are separated from the wine and sent to a press. The press crushes residual wine from grape skins. Both red and white wines are stored in refrigerated tanks year-round for bottling. Further VOC emissions occur as a result of the storage tank operation.

V. EQUIPMENT LISTING

Permit #	Equipment Description
N-2321-808-0	26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 1
N-2321-809-0	26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 2
N-2321-810-0	26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 3
N-2321-811-0	26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 4
N-2321-812-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 5
N-2321-813-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 6
N-2321-814-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 7
N-2321-815-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 8
N-2321-816-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 9
N-2321-817-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 10
N-2321-818-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 11
N-2321-819-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 12
N-2321-820-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 13
N-2321-821-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 14
N-2321-822-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 15
N-2321-823-0	30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 16
N-2321-824-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 101
N-2321-825-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 102

Continue...

Permit #	Equipment Description
N-2321-826-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 103
N-2321-827-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 104
N-2321-828-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 105
N-2321-829-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 106
N-2321-830-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 107
N-2321-831-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 108
N-2321-832-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 109
N-2321-833-0	60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 110

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

The proposed wine storage tanks are not equipped with any add-on control equipment; therefore, no further discussion is necessary.

VII. GENERAL CALCULATIONS

A. Assumptions

- VOC is the only pollutant emitted by the tanks.
- The wine processed in the proposed tanks contains a maximum of 20% alcohol by volume (per applicant).
- The maximum daily tank throughput will not be more than four times the tank capacity (per applicant).
- Each storage tank will not have more than 16 turnovers per year (per applicant).
- Other assumptions will be stated as they are made during the evaluation.

B. Emission Factors (EF)

1. Pre-Project Emission Factors (EF1)

The tanks are treated as new emission units. Therefore, EF1s are not listed here.

2. Post-Project Emission Factors (EF2)

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Operation	EF2 (lb-VOC/1,000 gal of wine)		Source
	Daily	Annual	
Wine storage (Red/White)	0.303	0.175	District FYI -114 (6/13/12), 20 vol.%, Northern Region

C. Calculations

1. Pre-Project Potential to Emit (PE1)

$$PE1 = 0$$

2. Post Project Potential to Emit (PE2)

The proposed tanks will be covered under the SLC of 1,167,178 lb-VOC/year. The daily and annual potential emissions from individual tanks are determined for the purpose of determining whether BACT is triggered and for inclusion of the potential emissions in the permits database. The following equations are used to calculate the potential emissions from wine storage operation.

$$PE1 \text{ (lb/day)} = (0.303 \text{ lb/1,000 gal})(\text{Tank Capacity, gal})(4 \text{ turnovers/day})$$

$$PE1 \text{ (lb/yr)} = (0.175 \text{ lb/1,000gal})(\text{Tank Capacity, gal})(16 \text{ turnovers/yr})$$

Permit #	Tank Capacity	PE2 (lb/day)	PE2 (lb/yr)
N-2321-808-0	26,470	32.1	74
N-2321-809-0	26,470	32.1	74
N-2321-810-0	26,470	32.1	74
N-2321-811-0	26,470	32.1	74
N-2321-812-0	30,129	36.5	84
N-2321-813-0	30,129	36.5	84
N-2321-814-0	30,129	36.5	84
N-2321-815-0	30,129	36.5	84
N-2321-816-0	30,129	36.5	84
N-2321-817-0	30,129	36.5	84
N-2321-818-0	30,129	36.5	84
N-2321-819-0	30,129	36.5	84
N-2321-820-0	30,129	36.5	84
N-2321-821-0	30,129	36.5	84
N-2321-822-0	30,129	36.5	84

Continue...

Permit #	Tank Capacity	PE2 (lb/day)	PE2 (lb/yr)
N-2321-823-0	30,129	36.5	84
N-2321-824-0	60,259	73.0	169
N-2321-825-0	60,259	73.0	169
N-2321-826-0	60,259	73.0	169
N-2321-827-0	60,259	73.0	169
N-2321-828-0	60,259	73.0	169
N-2321-829-0	60,259	73.0	169
N-2321-830-0	60,259	73.0	169
N-2321-831-0	60,259	73.0	169
N-2321-832-0	60,259	73.0	169
N-2321-833-0	60,259	73.0	169

3. Quarterly Emissions Changes

This calculation is required for application's emission profile, which is used for the District's internal tracking purposes. The emissions will be evenly distributed throughout the year as follows:

$$QEC = (PE2 - PE1) \text{ lb/year} \div 4 \text{ quarters/year}$$

This facility has an SLC of 1,167,178 lb/yr for VOC emissions from both fermentation and storage operations. This limit remains same after the proposed project. Therefore, there is no increase in quarterly emissions.

4. Adjusted Increase in Permitted Emissions (AIPE)

AIPE is used to determine if BACT is required for emission units that are being modified. AIPE is calculated using the equations mentioned in Section 4.3 and 4.4 of Rule 2201.

$$AIPE = PE2 - \left(\frac{EF2}{EF1} \right) (PE1)$$

The tanks under this project are treated as new emission units. Therefore, AIPE calculations are not required.

D. Facility Emissions

1. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units

with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The units in this project only emit VOC. VOC emissions from fermentation and storage emissions are limited to 1,167,178 lb-VOC/year. Therefore,

SSPE1 = 1,167,178 lb-VOC/year

2. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The applicant is not proposing any changes to the existing SLC. Therefore,

SSPE2 = 1,167,178 lb-VOC/year

3. Major Source Determination

Rule 2201 Major Source Determination

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- Any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165.

This facility is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)	
Category	VOC
Estimated Facility PE before Project Increase	583.6
PSD Major Source Threshold	250
PSD Major Source?	Yes

From the above table, the facility is an existing Major Source under PSD.

4. Stationary Source Increase in Potential Emissions (SSIPE)

It is District practice to define SSIPE as the difference of SSPE2 and SSPE1. SSPE2 is equal to SSPE1 for VOC emissions. Therefore, SSIPE will be zero due to the proposed project.

5. SB-288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Tanks operating at a winery are not completely independent emissions units since various processes at the facility may serve as a bottleneck to limit overall production. Therefore, the potential annual emissions increase must be determined considering all the other associated tanks in the facility.

Emissions increase (EI) from the proposed tanks is determined as the difference between the post project (PE2) and the pre project (PE1) potential emissions from the wine production operation based on the collective physical capacity of the wine tanks at the facility. Based on the collective physical capacity of the wine tanks in this facility, PE2 is determined to be 21,736 lb/yr. Please refer to the detailed calculations in Appendix III of this document.

SB 288 Major Modification Calculation and Determination					
Pollutant	PE2 (lb/yr)	PE1 (lb/yr)	EI (lb/yr)	Threshold (lb/yr)	SB2 88 Major Modification?
VOC	21,736	0	21,736	50,000	No

From the above table, this project is not an SB 288 Major Modification.

6. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. The first step is to determine if the project itself results in a significant emission increase. In this determination, only emission increases are counted. Emission decreases associated with the project are not counted. The second step is to determine if the project results in a significant net emission increase. Note that for projects involving NOx and VOC emission increases (those pollutants for which the District is in extreme non-attainment), only step 1 of the analysis is performed (as required in the Federal Clean Air Act section 182 (e) (2)). Step 2 of the analysis shall not be performed.

The tanks under this project are treated as new emission units. As discussed under the SB-288 major modification section, the emissions increase for this project is 21,736 lb-VOC/yr. Please refer to the detailed calculations in Appendix III of this document.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Threshold (lb/yr)	Federal Major Modification?
VOC	21,736	0	Yes

From the above table, this project is a Federal Major Modification.

VIII. COMPLIANCE

Rule 2201 New and Modified Stationary Source Review Rule

1. Best Available Control Technology (BACT)

BACT requirements shall be triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions:

- Any new emissions unit or relocation from one Stationary Source to another of an existing emissions unit with a Potential to Emit (PE2) exceeding 2.0 pounds in any one day;

- Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day;
- Any new or modified emissions unit, in a stationary source project, which results in a Major Modification, as defined in this rule.

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Per section VII.C.2 of this document, PE2 for VOC emissions is greater than 2.0 pounds per day for each tank. Thus, each tank triggers BACT for VOC emissions.

BACT guideline 5.4.13, *Wine Storage Tanks*, applies to all wine storage tanks in this project. This guideline requires the following achieved-in-practice standard:

VOC: Insulation or equivalent, pressure vacuum relief valve set within 10% of the maximum allowable working pressure of the tank, "gas-tight" tank operation, and continuous storage temperature not exceeding 75 °F, achieved within 60 days of completion of fermentation.

The tanks are made up of concrete and have epoxy lining inside to prevent the wine from getting into the concrete pores. These tanks have closed roof top design. Due to thick concrete wall construction, these tanks can withstand a typical pressure variation occurring during expansion and contraction of wine from temperature variations; therefore, these tanks are not equipped with pressure-vacuum relief valves. These tanks are proposed to be operated in a gas-tight condition while maintaining a continuous wine storage temperature at or below 75°F. The following conditions will be included in the permits:

- The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201]
- The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 2201]

2. Offsets

This facility's total VOC emissions are above the offset threshold level of 20,000 pounds per year. Therefore, offset calculations are required for this project.

The quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (SSPE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

Otherwise,

BE = Historic Actual Emissions (HAE)

Pursuant to District Policy APR 1420, *NSR Calculations for Units with Specific Limiting Conditions (3/12/07)*, the quantity of ERCs for a project will be determined by comparing the post project PE, which is the SLC, to the pre project BE for the SLC.

Additionally, the policy states that if the SLC is for a pollutant exceeding the Major Source threshold and any single unit under the SLC is not a Highly-Utilized, Fully-Offset, or Clean Emissions Units, then the sum of the actual emissions from all units in SLC will be used to determine the pre project BE.

As established in this document, all VOC emitting units at this facility meet the District's determination of achieved-in-practice BACT (and are thus Clean Emission Units), therefore the pre project BE emissions are equal to the pre project PE emissions ($BE_{SLC} = PE_{1SLC}$).

Based on the information above, the emissions increase to be offset for this project should be calculated as follows:

$$\text{Emissions Increase (lb/year)} = \text{PE}_{2\text{SLC}} - \text{BE}_{\text{SLC}}$$

Where: $\text{PE}_{2\text{SLC}}$ = Post project SLC selected by the facility. In this project,
 $\text{PE}_{2\text{SLC}} = \text{PE}_{1\text{SLC}}$.

$$\text{BE}_{\text{SLC}} = 1,167,178 \text{ lb-VOC/yr}$$

Therefore,

$$\begin{aligned} \text{Emissions Increase (lb/year)} &= \text{PE}_{2\text{SLC}} - \text{BE}_{\text{SLC}} \\ &= 1,167,178 \text{ lb-VOC/yr} - 1,167,178 \text{ lb-VOC/yr} \\ &= 0 \text{ lb-VOC/yr} \end{aligned}$$

3. Public Notification

District Rule 2201, section 5.4, requires a public notification for the affected pollutants from the following types of projects:

- New Major Sources
- Federal Major Modifications
- SB 288 Major Modifications
- New emission units with a $\text{PE} > 100$ lb/day of any one pollutant
- Modifications with SSPE_1 below an Offset threshold and SSPE_2 above an Offset threshold on a pollutant-by-pollutant basis
- New stationary sources with SSPE_2 exceeding Offset thresholds
- Any permitting action with a SSIPE exceeding 20,000 lb/yr for any one pollutant

Per section VII.D.6 of this document, this project is a Federal Major modification. Thus, this project triggers a 30-day public notice.

4. Daily Emission Limits (DELs)

The daily emissions limitations (DELs) and other enforceable conditions are required by Section 3.17 to restrict a unit's maximum daily emissions. The following conditions will be included in each permit:

- The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201]
- Daily tank throughput, in gallons, shall not exceed four times the tank capacity stated in the equipment description. [District Rule 2201]

5. Compliance Assurance

Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

Monitoring

The applicant is required to monitor the temperature of the wine stored in each tank on daily basis.

Recordkeeping

The facility will be required to keep daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, along with the records of total gallons of wine contained in a tank. These records are required to be retained on-site for a period of at least five years and made available for District inspection upon request.

Reporting

No reporting is required to demonstrate compliance with Rule 2201.

6. Ambient Air Quality Analysis

Per Section 4.14 of Rule 2201, ambient air quality analysis (AAQA) shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse the violation of an Ambient Air Quality Standard (AAQS).

This project involves only VOC (ethanol) for which AAQS does not exist; therefore, AAQA is not performed for this project.

7. Additional Requirements for new Major Sources and Federal Major Modifications

Per Section 4.15 of Rule 2201, "Compliance Certification" and "Alternative Siting Analysis" is required for any project, which constitutes a New Major Source or a Federal Major Modification.

Compliance Certification

The owner of a new Major Source or a source undergoing a Federal Major Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. The compliance certification from the facility is included in Appendix IV of this document.

Alternative Siting Analysis

The current project occurs at an existing winery with a pre-project total wine tank volume of 52,878,702 gallons. With the proposed tanks under this project, the total volume will be 53,948,720 gallons, which represents an increase of 2% of the existing total wine tank volume. Since the current project involves only a minimal increase in the winery's total tank volume and no change to any other facets of the operation, the existing site is expected to result in the least possible impact to the environment from the project. Alternative sites would involve the relocation and/or construction of various support structures and facilities on a much greater scale, and would therefore, result in a much greater impact.

Compliance is expected with this Rule.

Rule 2410 Prevention of Significant Deterioration

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀

Step 1:

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not. Per section VII.D.3 of this document, this facility is an existing major source under PSD.

Step 2:

The second step of the PSD evaluation is to determine if the project results in a PSD significant increase along with the project location relative to Class 1 area.

I. Project Location Relative to Class 1 Area

This facility is an existing major source for PSD. However, it is not located within 10 km of a Class 1 area, which in this case is "Yosemite National Park". Therefore, modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Significance of Project Emission Increase Determination

- a. Potential to Emit of attainment/unclassified pollutant for New or Modified Emission Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total

potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)					
Category	NO ₂	SO ₂	CO	PM	PM ₁₀
N-2321-808-0 to '-833-0	0.0	0.0	0.0	0.0	0.0
PSD Significant Emission Increase Thresholds	40	40	100	25	15
PSD Significant Emission Increase?	No	No	No	No	No

As demonstrated above, because the project has a total potential to emit from all new and modified emission units below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is a Major Source for VOC emissions, and is operating under Title V permit. Therefore, this facility is subject to the requirements in this rule.

The proposed project is a Significant Modification under Rule 2520 as the project triggered a Federal Major Modification. The applicant has requested to issue the ATCs with COC. Therefore, the following conditions will be included in each permit:

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule]
- Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs and
- The source's suggested draft permit (Appendix I of this document) and

- 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 (Appendix IV of this document).

Section 5.3.4 of this rule requires the permittee shall file an application for administrative permit amendments prior to implementing the requested change except when allowed by the operational flexibility provisions of section 6.4 of this rule. The applicant is expected to notify the District by filing TV Form-008 upon implementing the ATCs. The District Compliance Division is expected to submit a change order to implement these ATCs into PTOs.

Compliance is expected with this Rule.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to wine storage operation.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

No subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to wine storage tank operations.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. The following condition will be placed on each permit:

- No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 - Health Risk Assessment

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

VOC emissions from the tanks are primarily ethanol. Ethanol is not a HAP as defined by Section 44321 of the California Health and Safety Code. Therefore, health risk assessment is not necessary.

Compliance is expected with this Rule.

Rule 4694 Wine Fermentation and Storage Tanks

The purpose of this rule is to reduce emissions of volatile organic compounds (VOC) from the fermentation and bulk storage of wine, or achieve equivalent reductions from alternative emission sources.

This rule is applicable to all facilities with fermentation emissions in excess of 10 tons-VOC/year. The storage tank provisions of this rule apply to all tanks with capacity in excess of 5,000 gallons.

Section 5.1 requires the winery operator achieve Required Annual Emissions Reductions (RAER) equal to at least 35% of the winery's Baseline Fermentation Emissions (BFE). Per the definition of RAER in Section 3.25 of the Rule, the RAER may be achieved by any combination of Fermentation Emission Reductions (FER), Certified Emission Reductions (CER) or District Obtained Emission Reductions (DOER) as established in the facility's District-approved Rule 4694 Compliance Plan, due every three years on December 1st beginning in 2006. Condition 42 in the facility-wide permit N-2321-0-2 ensures on-going compliance with the requirements of this section.

Section 5.2 places specific restrictions on wine storage tanks with 5,000 gallons or more in capacity when such tanks are not constructed of wood or concrete. The proposed tanks are made up of concrete; therefore, section 5.2 does not apply.

Section 6.1 and 6.2 require the facility to submit a Three-Year Compliance Plan and a Three-Year Compliance Plan Verification respectively. Section 6.3 requires that an Annual Compliance Plan Demonstration be submitted to the District no later than February 1 of each year to show compliance with the applicable requirements of the Rule. Section 6.4.3 requires that all monitoring be performed for any Certified Emission Reductions as identified in the facility's Three-Year Compliance Plan and that the records of all monitoring be maintained. Conditions 43 through 47 ensure on-going compliance with the requirements of this section.

Section 6.4.2 requires that weekly records be kept of wine volume and temperature in each storage tank. The following conditions will be placed on the permit for each storage tank to ensure compliance with the requirements of Section 6.4.2:

- The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

Section 6.4 requires that records required by this rule be maintained, retained on-site for a minimum of five years, and made available to the APCO upon request. The following conditions will be placed on all permits to ensure compliance:

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

Compliance is expected with this Rule.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas Significance Determination

The proposed project is not expected to have any increase in GHG emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project will occur at an existing facility and the project involves negligible or no expansion of the existing use. Furthermore, the District determined that the project will not have a significant effect on the environment. The District finds that the project is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline §15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. RECOMMENDATION

Compliance with all applicable regulations is expected. Therefore, issuance of the ATCs is recommended.

X. BILLING INFORMATION

Permit #	Fee Schedule	Fee Description	Previous Fee Schedule
N-2321-808-0 to '-811-0 (each)	3020-05 C	26,470 gallons	None
N-2321-812-0 to '-823-0 (each)	3020-05 C	30,129 gallons	None
N-2321-824-0 to '-833-0 (each)	3020-05 D	60,259 gallons	None

APPENDICES

- Appendix I: Draft Authority to Construct Permits
- Appendix II: Top-Down BACT Analysis and BACT Guideline
- Appendix III: Winery Potential Emissions Increase Calculations
- Appendix IV: Compliance Certification Form

Appendix I
Draft Authority to Construct Permits

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-808-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 1

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

Arnaud Marjollet, Director of Permit Services

N-2321-808-0 Aug 26 2014 9:05AM - KAH/LONJ Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-809-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E. WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 2

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

N-2321-809-0 - Aug 25 2014 9:05AM - KAH/LOHJ - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-810-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 3

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

DRAFT
Arnaud Marjolle, Director of Permit Services

N-2321-810-0 - Aug 25 2014 9:05AM - KAHLOON - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
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11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-811-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

26,470 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 4

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director, APCO.

DRAFT
Arnaud Marjolle, Director of Permit Services

N-2321-811-0 | Aug 26 2014 8:05AM - KAVLONU | Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-812-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 5

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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.

Sayed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

N-2321-812-0 Aug 26 2014 9:05AM - KAH/LONJ - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-813-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 6

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

Arnaud Marjolle, Director of Permit Services

N-2321-813-0; Aug 25 2014; 9:05AM - KAHLOUJ; Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-814-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 7

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

Arnaud Marjolle, Director of Permit Services
N-2321-814-0, Aug 26 2014 9:05AM - KAHLOHJ - Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-815-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 8

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

DRAFT

Arnaud Marjolle, Director of Permit Services

N-2321-815-0 Aug 25 2014 0:05AM - KAH/LOU Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-816-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 9

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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.

Sayed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

N-2321-816-0, Aug 25 2014 9:06AM - KAHLOUJ - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-817-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 10

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services
N-2321-817-0, Aug 26 2014, 9:05AM - KAYLORU - Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-818-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 11

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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.

Sayed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services
N-2321-818-0, Aug 28, 2014, 9:05AM - KAH/LOJ Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-819-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 12

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit.
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjolle, Director of Permit Services
N-2321-819-01 Aug 26 2014 8:06AM - KAH/LONJ - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-820-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 13

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services
N-2321-820-0 - Aug 25 2014, 9:06AM - KARELON - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-821-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 14

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

Arnaud Marjolle, Director of Permit Services
N-2321-821-0, Aug 25 2014 9:08AM - KAF/LOU - Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-822-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 15

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

DRAFT

Arnaud Marjolle, Director of Permit Services
N-2321-822-0 - Aug 25 2014 9:06AM - KAH/LOJ - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-823-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
30,129 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 16

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

Arnaud Marjolle, Director of Permit Services

N-2321-823-0 | Aug 26 2014 9:08AM | KAHLOH | Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-824-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E. WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 101

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

Arnaud Marjolle, Director of Permit Services

N-2321-824-0, Aug 25 2014 9:08AM - KAH/LOUJ Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-825-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 102

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

N-2321-825-0, Aug 25 2014 9:00AM - KAH/CLN - Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
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12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-826-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 103

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

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Arnaud Marjolle, Director of Permit Services
N-2321-826-0 Aug 25 2014 9:06AM - KAH/ONJ - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-827-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 104

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

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Arnaud Marjolle, Director of Permit Services

N-2321-827-0 : Aug 25 2014 9:08AM - KAH/LONJ : Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-828-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 105

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] 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

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Arnaud Marjolle, Director of Permit Services

N-2321-828-0 - Aug 25 2014 9:00AM - KAHLONJ - Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-829-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 106

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director, APCD

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Arnaud Marjolle, Director of Permit Services

N-2321-829-0 Aug 28 2014 9:08AM - KAH/LOJ Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume % (when the ethanol content of wine is 20 volume %, P is equivalent to 0.20), $a = -0.38194$, $b = 0.97917$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12 month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-830-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 107

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

N-2321-830-0 : Aug 25 2014 : 0:06AM : KAHLONU : Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors, calculated using the equation(s) specified within this permit, based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
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13. The operator shall determine and record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. The operator shall maintain records of the calculated 12-month rolling wine ethanol content and storage throughput rate (ethanol percentage by volume and gallons per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
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17. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-831-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 108

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall be used exclusively for wine storage operations only and not for fermentation operations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds 10% of the maximum allowable working pressure of the tank. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director / APCO

DRAFT
Arnaud Marjolle, Director of Permit Services

N-2321-031-0 | Aug 26 2014 9:08AM - KAM/LON | Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
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DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-832-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)
MAILING ADDRESS: P O BOX 1260

WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 109

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
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Seyed Sadredin, Executive Director, APCO

DRAFT

Arnaud Marjolle, Director of Permit Services
N-2321-832-0 Aug 26 2014 9:06AM -- KAHLOUJ -- Joint Inspection NOT Required

7. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
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DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-833-0

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:
60,259 GALLON CONCRETE ENCLOSED TOP RED AND WHITE WINE STORAGE TANK 110

CONDITIONS

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

N-2321-833-0 Aug 26 2014 9:05AM - KAH/LOJ Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

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Appendix II
Top-Down BACT Analysis and BACT Guideline

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 5.4.13*

Last Update 10/6/2009

Wine Storage Tank

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	1. Insulation or Equivalent**, Pressure Vacuum Relief Valve (PVRV) set within 10% of the maximum allowable working pressure of the tank; "gas-tight" tank operation; and continuous storage temperature not exceeding 75 degrees F, achieved within 60 days of completion of fermentation.	1. Capture of VOCs and thermal or catalytic oxidation or equivalent (98% control) 2. Capture of VOCs and carbon adsorption or equivalent (95% control) 3. Capture of VOCs and absorption or equivalent (90% control) 4. Capture of VOCs and condensation or equivalent (70% control)	

****Tanks made of heat-conducting materials such as stainless steel may be insulated or stored indoors (in a completely enclosed building, except for vents, doors and other essential openings) to limit exposure of diurnal temperature variations. Tanks made entirely of non-conducting materials such as concrete and wood (except for fittings) are considered self-insulating.**

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

Top-Down BACT Analysis for VOCs from Wine Storage Operations

Step 1 - Identify All Possible Control Technologies

The SJVUAPCD BACT Clearinghouse guideline 5.4.13, 3rd quarter 2009, identifies achieved in practice and technologically feasible BACT for wine storage tanks as follows:

- 1) Insulation or Equivalent**, Pressure Vacuum Relief Valve (PVRV) set within 10% of the maximum allowable working pressure of the tank; "gas-tight" tank operation; and continuous storage temperature not exceeding 75 degrees F, achieved within 60 days of completion of fermentation.
- 2) Capture of VOCs and thermal or catalytic oxidation or equivalent (98% control)
- 3) Capture of VOCs and carbon adsorption or equivalent (95% control)
- 4) Capture of VOCs and absorption or equivalent (90% control)
- 5) Capture of VOCs and condensation or equivalent (70% control)

***Tanks made of heat-conducting materials such as stainless steel may be insulated or stored indoors (in a completely enclosed building, except for vents, doors and other essential openings) to limit exposure to diurnal temperature variations. Tanks made entirely of non-conducting materials such as concrete and wood (except for fittings) are considered self-insulating.*

Step 2 - Eliminate Technologically Infeasible Options

None of the above listed technologies are technologically infeasible.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Rank by Control Effectiveness			
Rank	Option	Control	Overall Capture & Control Efficiency ¹
1	2	Capture of VOCs and thermal or catalytic oxidation	98 %
2	3	Capture of VOCs and carbon adsorption	95 %
3	4	Capture of VOCs and absorption.	90 %
4	5	Capture of VOCs and condensation	70 %
5	1	Insulated tank, pressure/vacuum valve set within 10% of the maximum allowable working pressure of the tank, "gas tight" tank operation and 75°F tank temperature control as defined in District Rule 4694. (Achieved in Practice and Industry Standard)	0 %

¹ Relative to "industry standard"

Step 4 - Cost Effectiveness Analysis

A cost-effective analysis is performed for each control technology which is more effective than meeting the requirements of District Rule 4694 plus tank insulation (achieved-in-practice BACT). The cost-effectiveness analysis will be performed based on the following:

- Since the most cost effective approach will be achieved by installing a common control device for multiple tanks, the analysis will be based on this approach.
- To expand the scope and generality of this BACT, the cost-effectiveness analysis will be based on a hypothetical "industry-typical" storage tank operation consisting of a battery of twelve storage tanks each with a capacity of 200,000 gallons. Total annual throughput for the hypothetical tank battery is 39.6 million (MM) gallons per year based on an individual annual throughput of 3,300,000 gallons per year each (equivalent to almost 17 turns per year of each storage tank versus an estimated industry average of 6 turns per tank²). Total throughput subject to VOC control by a common VOC control device is thus 39.6 MM gal/year. Based on economies of scale, it is obvious that any control found to not be cost-effective at this level of throughput would be even less cost-effective at lower capacities.

Industry Standard

During the development of District Rule 4694, it was determined that use of pressure/vacuum valves (except wood and concrete tanks) and some level of refrigeration on wine storage tanks is a standard operation for large wineries in the San Joaquin Valley. Additionally, essentially all storage tanks are insulated. This was directly confirmed with four large wineries: Mission Bell (Madera), Gallo-Livingston, Bronco, and Robert Mondavi. Based on this information, the wine storage tank VOC control requirements of District Rule 4694 and tank insulation are also determined to be "industry standard".

The emission factor for "industry standard" operation is determined based on Table 1 of the District's FYI-114, Estimating Emissions from Wine Storage Tanks, for 20% ethanol content in the wine being stored.

EF (industry standard) = 0.175 lb-VOC/1000 gal of wine throughput

Uncontrolled emissions for Twelve-Tank Battery

Uncontrolled Emissions = Gallons Throughput/year × 0.175 lb-VOC/1000 gallons
= (39.6 × 10⁶ gal/year) × (0.175 lb-VOC/1000 gal)
= 6,930 lb/year

Capture of VOCs with Thermal or Catalytic Oxidation/ Carbon Adsorption/Absorption or Condensation (Options 2, 3, 4, and 5)

A common feature of all of these options is that they require installation of a collection system for delivering the VOCs from the tanks to the common control device. The analysis below indicates that these options are not cost effective by showing that just the annualized direct cost for the ductwork of the collection system and supporting structural steel and foundations alone is

² Per discussions with the Wine Institute (Bob Calvin of Constellation Wines) during Rule 4694 development (8/16/05)

too large, when considered at the District's cost effectiveness threshold for VOC BACT, to justify the capital investment required by these options. This approach ignores additional major costs for the actual control device and its installation and for equipment sterilization systems for ductwork and control device, instrumentation and control systems for isolation of individual tanks in the battery, site specific factors due to limited plot space (known to be a significant factor at all wineries), and operating and maintenance costs for each system. Should all these additional cost factors be included, the calculated cost effectiveness would be substantially higher than indicated below.

a. Control Efficiency

Option 2 is capable of a 98% reduction in VOC emissions while the remaining options under consideration have lesser control efficiencies. Showing that all of the options under consideration are not cost effective at a 98% reduction level based on capital investment requirements of ductwork and steel alone is adequate since options other than thermal/catalytic oxidation would be even less cost effective at their actual (lower) reduction levels.

$$\begin{aligned} \text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.98 \\ &= 6,930 \text{ lb-VOC/year} \times 0.98 \\ &= 6,791 \text{ lb-VOC/year} \\ &\approx 3.4 \text{ tons-VOC/year} \end{aligned}$$

b. Capital Investment for Installation of a VOC Collection System

Design and Estimate Basis:

- The basis and approach for the capital cost estimate for ductwork and support steel is summarized in BACT Attachment 1.
- The collection system consists of stainless steel plate ductwork (stainless steel is required due to cleanliness and sterilization requirements for wine quality considerations and due to the food grade product status) with isolation valving, connecting twelve 200,000 gallon tanks to a common manifold system which ducts the combined vent to the common control device. The cost of dampers and isolation valving, installed in the ductwork, will not be included in the cost estimate.
- A minimum duct size is established at 6 inches diameter at each tank to ensure minimal backpressure of the tank during filling operations and to provide adequate strength for spanning between supports. The main header is 12" diameter to handle the potential for simultaneously venting all tanks based on a potential fill rate of 1000 gpm for each tank (per applicant) and a duct velocity of 2000 feet per minute.
- The ductwork is designed with features to facilitate clean-in-place (CIP) operation to allow for periodic sterilization procedures as required for food grade products. The CIP system includes strategically placed spray nozzles on the ductwork for injecting sterilizing solutions into the system. Cost impacts to install CIP systems to clean the ducting are not included in the cost estimate.

- The ductwork is supported on a structural steel piperack mounted on drilled concrete piers, running through the new tank battery. Ducting elevations are established to allow continuous free draining to the separator located at the control device.
- Unit Installed Costs for Ductwork: A direct cost estimate for 12" diameter stainless steel ductwork, installed in a San Joaquin Valley winery, was taken from a study prepared by Eichleay Engineering for the Wine Institute in conjunction with development of District Rule 4694.³ The estimate is based on 2nd quarter 2005 dollars, and includes fittings, miscellaneous duct supports and other materials plus field labor costs required to install the ductwork, but does not include other associated indirect costs such as construction management, engineering, owner's cost, contingency, etc. BACT Attachment 1 presents the development of unit installed costs for stainless steel ducting based on the costs derived from the Eichleay estimate.
- A linear foot of ducting required was extracted from the Eichleay Estimate for a similar system at Gallo-Livingston (See BACT Attachment 1 in project C1090293).
- Costs for structural steel supports and foundations were extracted from the Eichleay Estimate for a similar system at Gallo-Livingston (See BACT Attachment 1 in project C1090293).
- Sales tax of 8% was applied to all materials.
- Indirect costs include Engineering, Construction Expense and Contractor's Fee and Contingency. Factors for these costs are taken from Peters & Timmerhaus⁴.
- Capital costs taken from the Eichleay estimate are 2005 dollars. These are escalated to 2014 based on 3% overall escalation per year.

Capital Investment (for ductwork and steel supports)

Fixed Capital Investment is summarized in the following table:

³Eichleay Engineers of California, Fermenter VOC Emissions Control Cost Estimate (Revision 1), Eichleay Project Numbers 30892 and 30913, June 30, 2005

⁴Peters & Timmerhaus, Plant Design and Economics for Chemical Engineers, 2nd Edition, McGraw-Hill, 1968, p.140.

Fixed Capital Investment for Options 2, 3, 4 and 5

Item	Qty	Unit	Unit Material Cost	Total Item Material Cost	Unit Labor Cost	Total Item Labor Cost	Unit Subcontract Price	Total Item Subcontract Cost	Total Item Direct Cost
Direct Cost									
6" Dia. Ducting	75	ft	\$32.11	\$2,408	\$29.20	\$2,190			\$4,598
12" Dia. Ducting	870	ft	\$75.33	\$65,537	\$68.49	\$59,586			\$125,123
Drilled Piers	32	ea.					\$1,000.00	\$32,000	\$32,000
Structural Steel Supports	1	lot	\$45,273	\$287,630	\$45,273	\$45,273			\$332,903
Direct Cost Subtotals				\$355,575		\$107,049		\$32,000	\$494,624
Sales Tax				\$28,446					\$28,446
Total Direct Cost				\$384,021		\$107,049		\$32,000	\$523,070
Indirect Costs									
Engineering @ 15% of Direct Cost									\$78,461
Construction Expense and Contractor's Fee @ 20% of Direct Cost									\$104,614
Contingency @ 15% of Fixed Capital Investment									\$124,614
Fixed Capital Investment (2005 Cost)									\$830,759
Escalation to 2014 @ 3%/year									\$253,193
Fixed Capital Investment (2014 Cost)									\$1,083,952

Annualized Capital Investment and Cost Effectiveness (based on ductwork)

Annualized Capital Investment = Initial Capital Investment x Amortization Factor

Amortization Factor = 0.163 per District policy, amortizing over 10 years at 10%

Therefore,

Annualized Capital Investment = \$1,083,952 × 0.163 = \$176,684

Cost Effectiveness = Annualized Cost/Annual Emission Reductions

Cost Effectiveness = \$176,684/3.4 tons-VOC = \$51,966/ton-VOC

The cost of VOC reductions considering the VOC collection system costs alone is more than the threshold limit of \$17,500/ton. It is conservative to assume that cost of VOC reduction would be greater than \$51,966/ton when both collection and control system costs are included in the analysis. Therefore, none of these control technologies are required at this time.

Step 5 - Select BACT

BACT for each of the tank is to comply with achieved-in-practice standard (option), that is, insulation and applicable control requirements from Rule 4694.

Appendix III
Winery Potential Emissions Increase Calculations

Winery Potential Emissions Increase Calculations

The purpose of the following calculations is solely to determine if the proposed project will trigger SB 288 Major Modification or Federal Major Modification. The increase (or difference) in emissions are calculated below using the current emission factors for wine tanks from District FYI-114. The facility has an existing specific limiting condition (SLC) that limits the total VOC emissions from all wine fermentation and storage operations at the facility to no more than 1,167,178 pounds of VOC per year. The existing SLC will not be changed with the addition of the wine storage tanks proposed under this project.

1. Potential to Emit (existing tanks)

The potential annual VOC emissions from the existing fermentation and storage operations at this winery are determined as follows:

White Wine Fermentation

$$\begin{aligned} W1 &= C \times D_w \times M \text{ (limited by crusher capacity)} \\ W2 &= P \times D_w \times M \text{ (limited by pressing capacity)} \\ W3 &= (V_{FW} \times D_w) / W_{FW} \text{ (limited by white fermenter volume)} \\ W4 &= (V_T \times D_w) / R_{TW} \text{ (limited by overall tank processing)} \end{aligned}$$

Where:

$$\begin{aligned} C &= \text{grape crushing capacity} \\ &= 13,200 \text{ tons/day (per engineering evaluation N-1092377)} \\ D_w &= \text{days in a white wine crush season} \\ &= 120 \text{ days} \\ M &= \text{amount of juice produced per ton of grapes crushed} \\ &= 200 \text{ gal/ton} \\ P &= \text{pressing capacity} \\ &= 8,400 \text{ tons/day (per engineering evaluation N-1092377)} \\ W_{FW} &= \text{white fermentation period} \\ &= 10 \text{ days} \\ R_{TW} &= \text{total winery retention time for white wine} \\ &= 40 \text{ days} + 10 \text{ days} = 50 \text{ days} \\ V_{FW} &= \text{total volume of white wine fermenters} \\ &= 52,868,604 \text{ gal (calculated)} \\ V_T &= \text{total winery cooperage} \\ &= 52,878,702 \text{ gal (calculated)} \end{aligned}$$

Using the above parameters,

$$\begin{aligned} W1 &= (13,200 \times 120 \times 200) &= & 316.80 \times 10^6 \text{ gal/year} \\ W2 &= (8,400 \times 120 \times 200) &= & 201.60 \times 10^6 \text{ gal/year} \\ W3 &= (52,868,604 \times 120) / 10 &= & 634.42 \times 10^6 \text{ gal/year} \\ W4 &= (52,878,702 \times 120) / 50 &= & 126.91 \times 10^6 \text{ gal/year} \end{aligned}$$

CBUS Ops Inc. is requesting to install 26 wine storage tanks. These tanks will result an increase facility's storage capacities, and no changes to the facility's fermentation, crushing or pressing capacities. Therefore crushing capacity and pressing capacity (W1 and W2) are not considered in the analysis. Only the fermenter volume and overall tank processing (W3 and W4) are compared.

$$W_w = W4 \text{ (lesser of } W3, W4) \\ = 126.91 \times 10^6 \text{ gal/year}$$

The potential white wine fermentation emissions would be:

$$PE1_{\text{White}} = E_{\text{FW}} \times W_w$$

Where:

$$E_{\text{FW}} = \text{white wine fermentation emission factor} \\ = 2.5 \text{ lb-VOC/1,000 gal (per District FYI-114)}$$

$$PE1_{\text{White}} = (2.5 \text{ lb-VOC/1,000 gal}) \times (126.91 \times 10^6 \text{ gal/yr}) \\ = 317,275 \text{ lb-VOC/year}$$

White Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE1_{\text{White}} = E_s \times T \times W_w$$

Where:

$$E_s = \text{wine storage emission factor based on District FYI-114 (6/13/12). The existing tanks allow them to store up to 20% alcohol by volume. Thus, } E_s \text{ is equal to } 0.175 \text{ lb-VOC/1,000 gal.}$$

$$T = \text{total post fermentation inter-tank transfers per batch of wine} \\ = 8$$

$$W_w = 126.91 \times 10^6 \text{ gal/year (determined above)}$$

$$PE1_{\text{white}} = (0.175 \text{ lb-VOC/1,000 gal}) \times (8) \times (126.91 \times 10^6 \text{ gal/year}) \\ = 177,674 \text{ lb-VOC/year}$$

Total PE1 for White Wine Production:

Potential emissions from 100% white wine production scenario are then determined as follows:

$$PE1_{\text{white}} = PE1_{\text{white fermentation}} + PE1_{\text{white storage}} \\ = 317,275 \text{ lb-VOC/year} + 177,674 \text{ lb-VOC/year} \\ = 494,949 \text{ lb-VOC/year}$$

Red Wine Fermentation Emissions:

$$W1 = C \times D_r \times M \text{ (limited by crusher capacity)}$$

$$W2 = P \times D_r \times M \text{ (limited by pressing capacity)}$$

$$W3 = (V_{FR} \times F \times D_r) / R_{FR} \text{ (limited by red fermenter volume)}$$

$$W4 = (V_T \times D_r) / R_{TS} \text{ (limited by overall tank processing)}$$

Where:

C	= grape crushing capacity = 13,200 tons/day
D _r	= days in a red wine crush season = 120 days
F	= Fill factor for red wine fermentation = 80%
M	= amount of juice produced per ton of grapes crushed = 200 gal/ton
P	= pressing capacity = 8,400 tons/day
R _{FR}	= red fermentation period = 5 days
R _{TS}	= total winery retention time for red wine = 40 days + 5 days = 45 days
V _{FR}	= total volume of red wine fermenters = 52,868,604 gal
V _T	= total winery cooperage = 52,878,702 gal

Using the above parameters,

W1	= (13,200 x 120 x 200)	=	316.80 x 10 ⁶ gal/year
W2	= (8,400 x 120 x 200)	=	201.60 x 10 ⁶ gal/year
W3	= (52,868,604 x 0.8 x 120)/5	=	1,015.08 x 10 ⁶ gal/year
W4	= (52,878,702 x 120)/45	=	141.00 x 10 ⁶ gal/year

CBUS Ops Inc. is requesting to install 26 wine storage tanks. These tanks will result an increase facility's storage capacities, and no changes to the facility's fermentation, crushing or pressing capacities. Therefore crushing capacity and pressing capacity (W1 and W2) are not considered in the analysis. Only the fermenter volume and overall tank processing (W3 and W4) are compared.

$$W_R = W4 \text{ (lesser of } W3, W4) \\ = 141.00 \times 10^6 \text{ gal/yr}$$

The potential red wine fermentation emissions would be:

$$PE_{1Red} = E_{FR} \times W_R$$

Where:

$$E_{FR} = \text{Red wine fermentation emission factor} \\ = 6.2 \text{ lb-VOC/1,000 gal (per District FYI-114)}$$

$$PE1_{red} = (6.2 \text{ lb-VOC/1,000 gal}) \times (141.00 \times 10^6 \text{ gal/yr}) \\ = 874,200 \text{ lb-VOC/year}$$

Red Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE1_{red} = E_s \times T \times W_R$$

Where:

E_s = wine storage emission factor based on District FYI-114 (6/13/12). The existing tanks allow them to store up to 20% alcohol by volume. Thus, E_s is equal to 0.175 lb-VOC/1,000 gal.

T = total post fermentation inter-tank transfers per batch of wine
= 8

W_R = 141.00 × 10⁶ gal/yr (determined above)

$$PE1_{red} = (0.175 \text{ lb-VOC/1,000 gal}) \times (8) \times (141.00 \times 10^6 \text{ gal/yr}) \\ = 197,400 \text{ lb-VOC/year}$$

Total PE1 for Red Wine Production:

Potential emissions from 100% red wine production scenario are then determined as follows:

$$PE1_{red} = PE1_{red \text{ fermentation}} + PE1_{red \text{ storage}} \\ = 874,200 \text{ lb-VOC/year} + 197,400 \text{ lb-VOC/year} \\ = 1,071,600 \text{ lb-VOC/year}$$

Summary:

The facility's pre-project emissions potential for fermentation and storage operations is then taken to be the greater of the white or red emissions potential determined above.

$$PE1 = \text{greater of } PE1_{white} \text{ or } PE1_{red} \\ = 1,071,600 \text{ lb-VOC/year}$$

2. Potential to Emit (existing tanks plus new tanks)

The potential annual VOC emissions from the existing fermentation and storage operations and the proposed tanks at this winery are determined as follows:

White Wine Fermentation

$W1 = C \times D_w \times M$ (limited by crusher capacity)

$W2 = P \times D_w \times M$ (limited by pressing capacity)

$W3 = (V_{FW} \times D_w) / W_{FW}$ (limited by white fermenter volume)

$W4 = (V_T \times D_w) / R_{TW}$ (limited by overall tank processing)

Where:

- C = grape crushing capacity
= 13,200 tons/day
- D_w = days in a white wine crush season
= 120 days
- M = amount of juice produced per ton of grapes crushed
= 200 gal/ton
- P = pressing capacity
= 8,400 tons/day
- W_{FW} = white fermentation period
= 10 days
- R_{TW} = total winery retention time for white wine
= 40 days + 10 days = 50 days
- V_{FW} = total volume of white wine fermenters
= 52,868,604 gal
- V_T = total winery cooperage
= 53,948,720 gal

Using the above parameters,

$$\begin{aligned} W1 &= (13,200 \times 120 \times 200) &= & 316.80 \times 10^6 \text{ gal/year} \\ W2 &= (8,400 \times 120 \times 200) &= & 201.60 \times 10^6 \text{ gal/year} \\ W3 &= (52,868,604 \times 120) / 10 &= & 634.42 \times 10^6 \text{ gal/year} \\ W4 &= (53,948,720 \times 120) / 50 &= & 129.48 \times 10^6 \text{ gal/year} \end{aligned}$$

CBUS Ops Inc. is requesting to install 26 wine storage tanks. These tanks will result an increase facility's storage capacities, and no changes to the facility's fermentation, crushing or pressing capacities. Therefore crushing capacity and pressing capacity (W1 and W2) are not considered in the analysis. Only the fermenter volume and overall tank processing (W3 and W4) are compared.

$$\begin{aligned} W_w &= W4 \text{ (lesser of } W3, W4) \\ &= 129.48 \times 10^6 \text{ gal/year} \end{aligned}$$

The potential white wine fermentation emissions would be:

$$PE2_{\text{white}} = E_{\text{FW}} \times W_w$$

Where:

$$\begin{aligned} E_{\text{fw}} &= \text{white wine fermentation emission factor} \\ &= 2.5 \text{ lb-VOC/1,000 gal (per District FYI-114)} \end{aligned}$$

$$\begin{aligned} PE2_{\text{white}} &= (2.5 \text{ lb-VOC/1,000 gal}) \times (129.48 \times 10^6 \text{ gal/yr}) \\ &= 323,700 \text{ lb-VOC/year} \end{aligned}$$

White Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE2_{white} = E_s \times T \times W_w$$

Where:

E_s = wine storage emission factor based on District FYI-114 (6/13/12). The tanks are allowed to store up to 20% alcohol by volume. Thus, E_s is equal to 0.175 lb-VOC/1,000 gal.

T = total post fermentation inter-tank transfers per batch of wine
= 8

W_w = 129.48×10^6 gal/year (determined above)

$$PE2_{white} = (0.175 \text{ lb-VOC}/1,000 \text{ gal}) \times (8) \times (129.48 \times 10^6 \text{ gal/year})$$
$$= 181,272 \text{ lb-VOC/year}$$

Total PE2 for White Wine Production:

Potential emissions from 100% white wine production scenario are then determined as follows:

$$PE2_{white} = PE2_{white \text{ fermentation}} + PE2_{white \text{ storage}}$$
$$= 323,700 \text{ lb-VOC/year} + 181,272 \text{ lb-VOC/year}$$
$$= 504,972 \text{ lb-VOC/year}$$

Red Wine Fermentation Emissions:

$W1 = C \times D_r \times M$ (limited by crusher capacity)

$W2 = P \times D_r \times M$ (limited by pressing capacity)

$W3 = (V_{FR} \times F \times D_r)/R_{FR}$ (limited by red fermenter volume)

$W4 = (V_T \times D_r)/R_{TS}$ (limited by overall tank processing)

Where:

C = grape crushing capacity
= 13,200 tons/day

D_r = days in a red wine crush season
= 120 days

F = Fill factor for red wine fermentation
= 80%

M = amount of juice produced per ton of grapes crushed
= 200 gal/ton

P = pressing capacity
= 8,400 tons/day

R_{FR} = red fermentation period
= 5 days

R_{TS} = total winery retention time for red wine
= 40 days + 5 days = 45 days

V_{FR} = total volume of red wine fermenters
= 52,868,604 gal

V_T = total winery cooperage
= 53,948,720 gal

Using the above parameters,

$$\begin{aligned} W1 &= (13,200 \times 120 \times 200) &= & 316.80 \times 10^6 \text{ gal/year} \\ W2 &= (8,400 \times 120 \times 200) &= & 201.60 \times 10^6 \text{ gal/year} \\ W3 &= (52,868,604 \times 0.8 \times 120) / 5 &= & 1,015.08 \times 10^6 \text{ gal/year} \\ W4 &= (53,948,720 \times 120) / 45 &= & 143.86 \times 10^6 \text{ gal/year} \end{aligned}$$

CBUS Ops Inc. is requesting to install 26 wine storage tanks. These tanks will result an increase facility's storage capacities, and no changes to the facility's fermentation, crushing or pressing capacities. Therefore crushing capacity and pressing capacity (W1 and W2) are not considered in the analysis. Only the fermenter volume and overall tank processing (W3 and W4) are compared.

$$\begin{aligned} W_R &= W4 \text{ (lesser of } W3, W4) \\ &= 143.86 \times 10^6 \text{ gal/year} \end{aligned}$$

The post-project potential red wine fermentation emissions would be:

$$PE2_{red} = E_{fr} \times W_R$$

Where:

$$\begin{aligned} E_{fr} &= \text{red wine fermentation emission factor} \\ &= 6.2 \text{ lb-VOC/1,000 gal (per District FYI-114)} \end{aligned}$$

$$\begin{aligned} PE2_{red} &= (6.2 \text{ lb-VOC/1,000 gal}) \times (143.86 \times 10^6 \text{ gal/yr}) \\ &= 891,932 \text{ lb-VOC/year} \end{aligned}$$

Red Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE2_{red} = E_s \times T \times W_R$$

Where:

$$\begin{aligned} E_s &= \text{wine storage emission factor based on District FYI-114 (6/13/12). The tanks are} \\ &\text{allowed to store up to 20\% alcohol by volume. Thus, } E_s \text{ is equal to } 0.175 \text{ lb-} \\ &\text{VOC/1,000 gal.} \end{aligned}$$

$$\begin{aligned} T &= \text{total post fermentation inter-tank transfers per batch of wine} \\ &= 8 \end{aligned}$$

$$W_R = 143.86 \times 10^6 \text{ gal/yr (determined above)}$$

$$\begin{aligned} PE2_{red} &= (0.175 \text{ lb-VOC/1,000 gal}) \times (8) \times (143.86 \times 10^6 \text{ gal/yr}) \\ &= 201,404 \text{ lb-VOC/year} \end{aligned}$$

Total PE2 for Red Wine Production:

Potential emissions from 100% red wine production scenario are then determined as follows:

$$\begin{aligned} PE2_{red} &= PE2_{red \text{ fermentation}} + PE2_{red \text{ storage}} \\ &= 891,932 \text{ lb-VOC/year} + 201,404 \text{ lb-VOC/year} \\ &= 1,093,336 \text{ lb-VOC/year} \end{aligned}$$

Summary:

The facility's post-project emissions potential for fermentation and storage operations is then taken to be the greater of the white or red emissions potential determined above.

$$\begin{aligned} PE2 &= \text{greater of } PE2_{white} \text{ or } PE2_{red} \\ &= 1,093,336 \text{ lb-VOC/year} \end{aligned}$$

3. Potential to Emit (new tanks)

The potential emissions from new tanks would be calculated as the difference between the post project and pre project potential emissions based on physical capacity. Thus,

Potential Emissions Based on Physical Capacity of Wine Processing Equipment	
Category	Total (lb-VOC/yr)
Pre Project (PE1)	1,071,600
Post Project (PE2)	1,093,336
PE2-PE1	21,736

Appendix IV
Compliance Certification Form



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: CBUS Ops Inc. (DBA WOODBRIDGE WINERY)	FACILITY ID: N- 2321
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: CONSTELLATION BRANDS U.S. OPERATIONS INC.	
3. Agent to the Owner: Josh Schulze	

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:

Jim Crandell

Signature of Responsible Official

6-23-2014

Date

Jim Crandell

Name of Responsible Official (please print)

Facilities Director

Title of Responsible Official (please print)



Constellation
Brands

RECEIVED

7/16/2014

JUL 28 2014

Mr. Rupi Gill
San Joaquin Valley Air Pollution Control District
4800 Enterprise Way
Modesto CA 95356-8718

SJVAPCD
NORTHERN REGION

Subject: Compliance Statement for Woodbridge Winery (FID #N-2321)

Dear Mr. Gill:

In accordance with Rule 2201, Section 4.15, "Additional Requirements for New Major Sources and Federal Major Modifications," Woodbridge Winery is providing this compliance statement regarding its proposed winery project N-1142591.

All major stationary sources in California owned or operated by Constellation Brands, the parent company for Woodbridge Winery, or by any entity controlling, controlled by, or under common control with Woodbridge Winery, and which are subject to emission limitations, are in compliance or on a schedule for compliance with all applicable emission limitations and standards. These sources include one or more of the following facilities:

1. Woodbridge Winery
5950 E Woodbridge Ave
Acampo, CA
2. Turner Road Vintners
4614 W Turner Road
Lodi, CA 95242
3. Mission Bell Winery
12667 Road 24
Madera, CA 93637

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Please contact me if you have any questions regarding this certification.

Sincerely,

Jim Crandell, Facilities Director
Woodbridge Winery

Our vision: To elevate life with every glass raised

Constellation Brands, Inc. · 5950 East Woodbridge Road · Acampo, CA 95220
Direct: 209-369-5861 · Fax: 209-365-8039 · www.cbrands.com