



APR 05 2018

Mr. David Crippen
Bear Creek Winery
11900 N. Furry Road
Lodi, CA 95240

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Facility Number: N-96
Project Number: N-1173637

Dear Mr. Crippen:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This project is for the installation of twenty-two wine storage tanks.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authorities to Construct with Certificates of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
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San Joaquin Valley Air Pollution Control District

Authority to Construct Application Review

Install 22 new wine storage tanks

Facility Name: Bear Creek Winery
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Application #(s): N-96-405-0 thru -426-0
Project #: N-1173637
Deemed Complete: December 21, 2017

Date: March 20, 2018
Engineer: Wai-Man So
Lead Engineer: Nick Peirce

I. Proposal

Bear Creek Winery is requesting Authorities to Construct (ATC) to install six 3,200 gallon (each), seven 2,000 gallon (each), six 216,000 gallon (each), one 160,000 gallon, and two 50,000 gallon (each), stainless steel wine tanks. These twenty-two new tanks are solely used for wine storage operation. The draft ATCs are included in **Appendix A**.

Bear Creek Winery has a facility-wide specific limiting condition (SLC) of 242,165 pounds of VOC per year for wine fermentation and storage operations. The applicant is not proposing any changes to this limit with the addition of these twenty-two wine storage tanks.

Bear Creek Winery possesses a Title V permit. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Bear Creek Winery must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
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 4102	Nuisance (12/17/92)
Rule 4623	Storage of Organic Liquids (5/19/05)

Rule 4694 Wine Fermentation and Storage Tanks (12/15/05)
Rule 4695 Brandy Aging and Wine Aging Operations (9/17/09)
CH&SC 41700 Health Risk Assessment
CH&SC 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 11900 North Furry Road in Lodi, California. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Bear Creek Winery produces both red and white table wines, as well as other specialty wine products, from the fermentation of grapes. During the "crush season," typically from late August to late November, both red and white grapes are received by truck and delivered to a crusher-stemmer which serves to crush the grapes and remove the stems. In the case of red wines, the resultant juice (termed "must" and containing the grape skins, pulp and seeds) is pumped to red wine fermentation tanks for fermentation, a batch process. The red wine fermentation tanks are specifically designed to ferment the must in contact with the skins and to allow the separation of the skins and seeds from the wine after fermentation. In the case of white wines, the must is sent to screens and presses for separation of grape skins and seeds prior to fermentation. After separation of the skins and seeds, the white must is transferred to a fermentation tank. White wine fermentation can be carried out in a tank without design provisions for solids separation since the skins and seeds have already been separated.

After transfer of the must (for red or white wine) to the fermentation tank, the must is inoculated with yeast which initiates the fermentation reactions. During fermentation, the yeast metabolizes the sugar in the grape juice, converting it to ethanol and carbon dioxide (CO₂) while releasing heat. Temperature is typically controlled by refrigeration, and is maintained at 45–65 °F for white wine fermentation and 70–95 °F for red wine fermentation. The sugar content of the fermentation mass is measured in °Brix (weight %) and is typically 22–26° for unfermented grape juice, dropping to 4° or less at the end of fermentation. Finished ethanol concentration is no more than 20 percent by volume. Batch fermentation requires 5 days per batch for red wine and 1-2 weeks per batch for white wine. VOCs are emitted during the fermentation process along with the CO₂. The VOCs consist primarily of ethanol along with small quantities of other fermentation byproducts.

Following the completion of fermentation, white wine is transferred directly to storage tanks. Red wine is first directed to the presses for separation of solids and then routed to the storage tanks. All tanks in the winery typically operate as two separate emissions units: (1) a fermentation operation during which the tank is vented directly to the atmosphere to release

the evolved CO₂ byproduct from the fermentation reaction; and (2) a storage operation during which the tank is closed to minimize contact with air and refrigerated to preserve the wine. Post-fermentation operations such as cold stabilization, racking, and filtration are conducted in the tanks, resulting in a number of inter-tank transfers during the period between the end of fermentation and bottling or bulk shipment. Storage operations are conducted year-round. VOC emissions occur primarily as a result of the inter-tank transfers which are necessitated by the post fermentation operations. The new tanks addressed under this project will be used strictly for wine storage operations.

V. Equipment Listing

Permit Unit	Equipment Description
N-96-405-0	3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #209) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-406-0	3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #210) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-407-0	3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #211) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-408-0	3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #212) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-409-0	3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #213) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-410-0	3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #214) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-411-0	2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #215) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-412-0	2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #216) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-413-0	2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #217) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-414-0	2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #218) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-415-0	2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #219) WITH PRESSURE/VACUUM VALVE AND INSULATION

N-96-416-0	2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #220) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-417-0	2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #221) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-418-0	216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #717) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-419-0	216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #718) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-420-0	216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #719) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-421-0	216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #720) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-422-0	216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #721) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-423-0	216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #722) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-424-0	160,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #729) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-425-0	50,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #738) WITH PRESSURE/VACUUM VALVE AND INSULATION
N-96-426-0	50,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #739) WITH PRESSURE/VACUUM VALVE AND INSULATION

In addition, per District practice, for new winery tank installations, the nominal tank size and dimensions are included on the ATC provided by the applicant. Upon completion of construction, Bear Creek Winery will perform an actual tank capacity measurement on each tank, which will establish the as built gauge rating of each tank. The equipment description of the Permit to Operate will then be administratively updated with the gauge rating of each tank. The following condition (typical condition shown for these identical tanks) will be included on each ATC to assure continued compliance:

N-96-405-0 thru '-410-0 (Total of 6 tanks)

- The nominal tank dimensions are 6.5 feet in diameter and 14 feet in height with a proposed volume of 3,200 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201]

N-96-411-0 thru '-417-0 (Total of 7 tanks)

- The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201]

N-96-418-0 thru '-423-0 (Total of 6 tanks)

- The nominal tank dimensions are 30.0 feet in diameter and 40 feet in height with a proposed volume of 216,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201]

N-96-424-0

- The nominal tank dimensions are 26.0 feet in diameter and 40 feet in height with a proposed volume of 160,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201]

N-96-425-0 thru '-426-0 (Total of 2 tanks)

- The nominal tank dimensions are 14.5 feet in diameter and 40 feet in height with a proposed volume of 50,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201]

VI. Emission Control Technology Evaluation

VOCs (ethanol) are emitted from the wine storage tanks as a result of both working losses (which occur when the liquid level in the tank changes) and breathing losses (expansion and contraction effects due to temperature variations). The proposed pressure/vacuum valve limits these emissions by requiring the maximum amount of variation in tank pressure before allowing the tank to vent to the atmosphere or allowing air admission to the tank.

VII. General Calculations

A. Assumptions

- VOC is the only pollutant emitted associate with this project.
- Typically, for enclosed tanks with refrigeration and/or insulation (or equivalent) and P/V valves, breathing losses from storage of wine are assumed to be negligible.
- The wine processed in the proposed tanks contains a maximum of 20% alcohol by volume.

- A daily storage tank throughput will not exceed 4 times the maximum nominal tank capacity for each tank, equivalent to : a) 128,000 gallons per year for each 3,200 gallon size tank; b) 8,000 gallons per year for each 2,000 gallon size tank; c) 864,000 gallon per year for each 216,000 gallon size tank; d) 640,000 gallons per year for each 160,000 gallon size tank; and e) 200,000 gallons per year for each 50,000 gallon size tank; (per applicant).
- An annual storage tank throughput will not exceed 20 times the maximum nominal tank capacity for each tank, equivalent to: a) 64,000 gallons per year for each 3,200 gallon size tank; b) 40,000 gallons per year for each 2,000 gallon size tank; c) 4,320,000 gallon per year for each 216,000 gallon size tank; d) 3,200,000 gallons per year for each 160,000 gallon size tank; and e) 1,000,000 gallons per year for each 50,000 gallon size tank; (per applicant).
- Other assumptions will be stated as they are made.

B. Emission Factors

Emissions factors are taken from District FYI-114, *VOC Emission Factors for Wine Fermentation and Storage Tanks*, for facility located in the Northern Region with ethanol concentration of 20% volume as follows:

Wine Storage Emission Factors			
Wine Type	EF2 (lb-VOC/1,000 gallon of wine)		Source
	Daily	Annual	
Red/White	0.303	0.175	FYI-114, Table 1

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Since these are new emissions units, PE1 = 0 for all pollutants.

2. Post Project Potential to Emit (PE2)

The potential daily and annual VOC emissions of the proposed tanks are determined as follows:

$$\text{Daily PE2} = \text{EF (lb-VOC/1,000 gal)} \times \text{tank capacity (gal/tank)} \times \text{turnover rate (tank/day)}$$

$$\text{Annual PE2} = \text{EF (lb-VOC/1,000 gal)} \times \text{tank capacity (gal/tank)} \times \text{turnover rate (tank/year)}$$

Permit Unit	Daily EF	Annual EF	Tank Capacity	Turnover rate	Turnover rate	Daily	Annual
	(lb-VOC/1,000 gal)		(gallon)	(tank/day)	(tank/yr)	(lb/day)	(lb/yr)
N-96-405-0	0.303	0.175	3,200	4	20	13.1	11
N-96-406-0						13.1	11
N-96-407-0						13.1	11
N-96-408-0						13.1	11
N-96-409-0						13.1	11
N-96-410-0						13.1	11
N-96-411-0	0.303	0.175	2,000	4	20	2.4	7
N-96-412-0						2.4	7
N-96-413-0						2.4	7
N-96-414-0						2.4	7
N-96-415-0						2.4	7
N-96-416-0						2.4	7
N-96-417-0	0.303	0.175	216,000	4	20	261.8	756
N-96-418-0						261.8	756
N-96-419-0						261.8	756
N-96-420-0						261.8	756
N-96-421-0						261.8	756
N-96-422-0						261.8	756
N-96-423-0	0.303	0.175	160,000	4	20	193.9	560
N-96-424-0						60.6	175
N-96-425-0	0.303	0.175	50,000	4	20	60.6	175
N-96-426-0						60.6	175
Total							5,561

This facility has an existing specific limiting condition (SLC) that limits VOC emissions from all wine fermentation and wine storage operations to 242,165 pounds of VOC per year. The applicant is not proposing any changes to this SLC limit with the installation of these additional 22 wine storage tanks.

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

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

This project involves only VOC emissions, and the current VOC emissions from this facility are taken from engineering evaluation under project N-1170278. The facility has no other permit units with valid ATCs and PTOs that emit NOx, SO, PM10, and CO. The SSPE1 is presented in the following table.

SSPE1 (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	0	0	0	0	242,165

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

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

This project involves only VOC emissions, and the VOC emissions of this facility are already above the Offset and Major Source Thresholds for VOC emissions. No changes to the SLC limit with the installation of these additional 22 wine storage tanks. The SSPE2 is presented in the following table.

SSPE2 (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	0	0	0	0	242,165
N-96-405-0 thru N-96-426-0 (new)	0	0	0	0	
SSPE2	0	0	0	0	242,165

5. 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 source 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)(iii). Therefore, the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

As discussed above, this facility has an existing specific limiting condition (SLC) that limits VOC emissions from all wine fermentation and wine storage operations to 242,165 pounds of VOC per year, equivalent to 121.1 tons of VOC per year.

PSD Major Source Determination (tons/year)	
	VOC
Estimated Facility PE before Project Increase	121.1
PSD Major Source Thresholds	250
PSD Major Source ? (Y/N)	No

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 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), calculated pursuant to District Rule 2201.

N-96-405-0 thru '-426-0: (22 New Wine Storage Tanks)

These new emission units are being added to the facility's existing SLC of 242,165 pounds of VOC per year for wine fermentation and storage operations, and the facility is not proposing any change to the existing SLC limit as a result of this project. Pursuant to District Policy APR 1420, *NSR Calculations for Units with Specific Limiting Conditions (3/12/07)*, the Baseline Emissions (BE) for units included in an SLC shall be the maximum combined emissions allowed for those units under the SLC.

Additionally, District Policy APR 1420 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 for the units in the SLC.

As established in District Project N-1100320 and the subsequent projects for all newly installed wine tanks, all of the wine tanks at this facility satisfy the requirements of achieved-in-practice Best Available Control Technology (BACT) for wine fermentation and storage as accepted by the District during the five years immediately prior to the submission of the complete application for the project, and are thus Clean Emission Units; therefore, the pre-project BE emissions for the units in the SLC are equal to the pre-project for the units in the SLC ($BE_{SLC} = PE1_{SLC}$).

Therefore, BE for VOC from units $BE_{SLC} = PE1_{SLC} = 242,165$ lb-VOC/year

7. 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."

Since this facility is a major source for VOC, the project's PE2 is compared to the SB 288 Major Modification Threshold for VOC in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
VOC	5,561	50,000	No

Since the SB 288 Major Modification Threshold for VOC is not surpassed with this project, this project does not constitute an SB 288 Major Modification.

8. 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. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

For new emissions units, the increase in emissions is equal to the PE2 for each new unit included in this project.

N-96-405-0 thru -426-0: (22 New Wine Storage Tanks)

These are new emissions units, and as shown in previous section of this document, the PE2 for these new emissions units is greater than the Federal Major Modification Threshold of 0 lb-VOC/year. Therefore, this project does constitute a Federal Major Modification. Federal Offset quantities are calculated as follow.

Federal Offset Quantities:

The Federal offset quantity is only calculated only for the pollutants for which the project is a Federal Major Modification. The Federal offset quantity is the sum of the annual emission changes for all new and modified emission units in a project calculated as the potential to emit after the modification (PE2) minus the actual emissions (AE) during the baseline period for each emission unit times the applicable federal offset ratio.

VOC		Federal Offset Ratio		1.5
Permit No.	Actual Emissions (lb/year)	Potential Emissions (lb/year)	Emissions Change (lb/yr)	
N-96-405-0	0	11	11	
N-96-406-0	0	11	11	
N-96-407-0	0	11	11	
N-96-408-0	0	11	11	
N-96-409-0	0	11	11	
N-96-410-0	0	11	11	
N-96-411-0	0	7	7	
N-96-412-0	0	7	7	
N-96-413-0	0	7	7	
N-96-414-0	0	7	7	
N-96-415-0	0	7	7	
N-96-416-0	0	7	7	
N-96-417-0	0	7	7	
N-96-418-0	0	756	756	
N-96-419-0	0	756	756	
N-96-420-0	0	756	756	
N-96-421-0	0	756	756	
N-96-422-0	0	756	756	
N-96-423-0	0	756	756	
N-96-424-0	0	560	560	
N-96-425-0	0	175	175	
N-96-426-0	0	175	175	
Net Emission Change (lb/year):			5,561	
Federal Offset Quantity: (NEC * 1.5)			8,342	

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

The equipment associated with this project emits only VOC.

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

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)(iii). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO₂	VOC	SO₂	CO	PM	PM₁₀
Total PE from New and Modified Units	0	2.8	0	0	0	0
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	No	No	No	No	No	No

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Because the proposed wine storage tanks will be subject to the existing SLC that limits VOC emissions from all wine fermentation and wine storage operations at the facility, there will be no overall increase in potential to emit at the facility. Therefore, QNEC is equal to zero for each quarter for each permit unit.

VIII. Compliance Determination

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As seen in Section VII.C.2 above, the applicant is proposing to install twenty-two new wine storage tanks. BACT is triggered for VOC since the PE from each new tank is greater than 2.0 lb/day.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore, BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

As discussed in Section I above, there are no modified emissions units associated with this project. Therefore, BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.8 above, this project does constitute a Federal Major Modification for VOC emissions. Therefore, BACT is triggered for VOC for all emissions units in the project for which there is an emission increase.

2. BACT Guideline

BACT Guideline 5.4.13, applies to the wine storage tanks (see **Appendix B**)

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see **Appendix C**), BACT has been satisfied with the following:

VOC: Insulated tank, pressure/vacuum 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

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

As discussed above, this facility is an existing major source for VOC, and the pre-project and post project potential emissions are each greater than the offset thresholds for VOC. Therefore, offset calculations will be 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) = $(\Sigma[PE2 - BE] + ICCE) \times DOR$, 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, determined pursuant to Section 4.8

BE = PE1 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 = HAE

Bear Creek Winery has no dedicated cargo carrier equipment, defined in section 3.12 of Rule 2201 on site. Therefore, no increases in Cargo Carrier emissions as result of this project. This proposed project constitutes a Federal Major Modification, which requires DOR of 1.5 pursuant to section 4.8.1 of this Rule. Thus,

$$\text{Offset Required} = \Sigma [(PE2 - BE) + 0] \times 1.5$$

The facility has an existing SLC of 242,165 pounds of VOC per year for wine fermentation and storage operations, and the applicant is not proposing any change to this limit as a result of this project.

Pursuant to District Policy APR 1420, *NSR Calculations for Units with Specific Limiting Conditions (3/12/07)*, the quantity of ERCs for units included in an SLC shall be determined by comparing the post-project PE for the SLC to the pre-project BE for the SLC.

As discussed in Section VII.C.6 of this document, BE for the SLC (BE_{SLC}) = $PE1_{SLC}$ = 242,165 lb-VOC/yr. Therefore, the emissions increase to be offset for this project is calculated as follows:

$$\begin{aligned} \text{Emissions Increase (lb/year)} &= [PE2_{SLC} - PE1_{SLC}] \times 1.5 \\ &= [(242,165 - 242,165) \times 1.5] \text{ lb-VOC/year} \\ &= 0 \text{ lb-VOC/year} \end{aligned}$$

As demonstrated in the calculation above, the amount of offsets is zero. Therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed,
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
- e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Section VII.C.8 of this document, this project is a Federal Major Modification. Therefore, public noticing for Federal Major Modification purposes is required.

b. PE > 100 lb/day

The PE2 for each of the following new wine storage tanks, N-96-418-0 thru N-96-424-0 is greater than 100 lb/day for VOC emissions. Therefore, public noticing for PE > 100 lb/day purposes is required.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
VOC	242,165	242,165	20,000 lb/year	No

As shown in above table, the SSPE1 was already greater than the VOC offset threshold. Therefore, public noticing is not required for offset purpose.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1.

As discussed above, the proposed new tanks will be installed under the existing SLC for VOC emissions, so there will be no overall increase in VOC emissions as a result of this project. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
VOC	242,165	242,165	0	20,000 lb/year	No

As demonstrated above, the SSIPE for VOC, the only pollutant associated with this project was less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

Since the proposed project triggers a Federal Major Modification, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

2. Public Notice Action

As discussed above, public noticing is required for this project for VOC emissions in excess of 100 lb/day for new emission unit, and a Title V Significant Permit Modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATCs for the equipment.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

For the proposed wine storage tank in this project, the DEL is enforced with the following conditions:

N-96-405-0 thru '426-0 (All 22 New Wine Storage Tanks)

- This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201]
- The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201]
- Daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201]
- This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694]

- The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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]
- The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694]
- Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 242,165 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201]

Bear Creek Winery has about 400 wine tanks with a SLC that limits VOC emissions from all wine fermentation and storage operations to 242,165 pounds per year. All wine tank permits have standardize conditions specifying how the batch-specific wine storage VOC emission factor and the annual wine storage VOC emissions shall be calculated. The facility has established recordkeeping mechanisms to be used to demonstrate compliance with the SLC limit. By utilizing the standardize equation, the wine storage emission factor is calculated to be higher than using the wine storage emission factor listed in Table of the current version of FYI-114. Therefore, be conservative, and to ease the recordkeeping requirements, the following standardize conditions will be listed on the new storage tank permits:

- The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
- Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

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

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions are listed on the permit to operate:

- 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]
- The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rule 2201]
- If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201]
- Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201]
- 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]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. However, this project involves only VOCs (mainly ethanol) for which AAQS does not exist; therefore, AAQA is not performed for this project.

G. Compliance Certification

Section 4.15.2 of this Rule requires 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. As discussed in Section VII.8 above, the proposed project constitutes a Federal Major Modification, and therefore, this requirement is applicable. Bear Creek Winery's compliance statement is included in Appendix D of this document.

H. Alternate Siting Analysis

The current project occurs at an existing facility. The applicant proposes to install additional twenty-two wine storage tanks at the existing winery with about 400 existing wine processing tanks.

Since the current project involves the installation of additional twenty-two wine storage tanks, it represents only a minimal increase in the winery's total tank volume and no change to any other facets of the operation, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures on a much greater scale, and would therefore result in a much greater impact.

Compliance with the requirements of this Rule is expected.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII.C.9 above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

A minor permit modification is a permit modification that does not meet the definition of modification as given in Section 111 or Section 112 of the Federal Clean Air Act.

The proposed project constitutes a Significant Modification to the Title V Permit, as the project triggered a Federal Major Modification under the Federal Clean Air Act. The facility has applied for a Certificate of Conformity (COC), and therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility shall not implement the changes requested until the final permit is issued.

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 operations.

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

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to wine storage operations.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of wine storage operations, provided the equipment is well maintained.

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.

Ethanol is the only pollutant that will be emitted by the proposed wine tanks. Ethanol is not a HAP as defined by Section 44321 of the California Health and Safety Code. Therefore, there are no increases in HAP emissions associated with any emission units in this project and a health risk assessment is not necessary. No further risk analysis is required.

Therefore, compliance with the requirements of this rule is expected and the following condition will be listed on the permit:

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

Rule 4623 Storage of Organic Liquids

The purpose of this rule is to limit volatile organic compound (VOC) emissions from the storage of organic liquids. This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

Section 4.1.4 states that this rule shall not apply to tanks used in wine fermentation and to stores fermentation products, byproducts, and spirits.

The tanks in this project are used solely for the storage of wine. Therefore, the requirements of this rule are not applicable to any of the winery tanks within this project.

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 of VOC per year.

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). Since the proposed tanks will be used for storage only, this section is not applicable; therefore, no further discussion is required.

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. Section 5.2.1 requires these tanks to be equipped and operated with a pressure-vacuum relief valve meeting all of the following requirements:

- The pressure-vacuum relief valve shall operate within 10% of the maximum allowable working pressure of the tank,
- The pressure-vacuum relief valve shall operate in accordance with the manufacturer's instructions, and
- The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings.
- The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21.

The following conditions will be listed on the permit for each proposed stainless steel storage tank with capacity greater than and equal to 5,000 gallons to ensure compliance with the requirements of this section:

N-96-418-0 thru '-426-0

- This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694]
- The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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]

Section 5.2.2 requires that the temperature of the stored wine be maintained at or below 75°F.

The following conditions will be listed on the permit for each proposed stainless steel storage tank with capacity greater than and equal to 5,000 gallons to ensure compliance with the requirements of this section:

N-96-418-0 thru '-426-0

- The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694]

Every three years, 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.

The facility has submitted the required plans to the District and is currently satisfying these requirements. Since, the proposed tanks in this project are for wine storage only, and these sections are not applicable to wine storage operations, no further discussion is required.

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 condition will be listed on the permit to ensure on-going compliance with this section:

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

Section 6.4.1 requires that records be kept for each fermentation batch. The proposed tanks are not fermenters; and therefore, this section does not apply.

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

- 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]

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.

Since this requirement is for operators mitigation fermentation emission and the proposed tanks are only for wine storage operations, this section is not applicable to wine tanks in this project. Therefore, no further discussion is required.

Compliance with the requirements of this Rule is expected.

Rule 4695 Brandy Aging and Wine aging Operations

The purpose of this rule is to limit volatile organic compound (VOC) emissions from brandy aging and wine aging operations.

Section 4.2 states that this rule shall not apply to wine storage tanks subject to Rule 4694 (Wine Fermentation and Storage Tanks) Section 5.2.

As stated above, the proposed wine storage tanks are subject to Rule 4694, Section 5.2, and therefore, these tanks are exempt from the requirements of this rule, and no further discussion is required.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. In addition, the proposed project will not result in an increase in Toxic Air Contaminants. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

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 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; and
- 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.

The County of San Joaquin (County) is the public agency having principal responsibility for approving the project. As such, the County served as the Lead Agency (CCR §15367). In approving the project, the Lead Agency prepared and adopted a Negative Declaration. The Lead agency filed a Notice of Determination, stating that the environmental document was adopted pursuant to the provisions of CEQA and concluding that the project would not have a significant effect on the environment.

The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CCR §15381). As a Responsible Agency the District complies with CEQA by considering the environmental document prepared by the Lead Agency, and by reaching its own conclusion on whether and how to approve the project (CCR §15096).

The District has considered the Lead Agency's environmental document and finds that it adequately characterizes the project's potential impact on air quality. In addition, all feasible and cost-effective control measures to reduce potential impacts on air quality resulting from project related stationary source emissions have been applied to the project as part of BACT. Furthermore, the District has conducted an engineering evaluation of the project, this document, which demonstrates that Stationary Source emissions from the project would be reduced. Thus, the District finds that through a combination of project design elements, compliance with applicable District rules and regulations, and compliance with District air permit conditions, project specific stationary source emissions would be reduced to lessen the impacts on air quality. The District does not have authority over any of the other project impacts and has, therefore, determined that no additional findings are required (CEQA Guidelines §15096(h)).

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an indemnification agreement and/or letter of credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATC N-96-405-0 through N-96-426-0 subject to the permit conditions on the attached draft ATCs in **Appendix A**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-96-405-0 thru N-96-410-0 (each)	3020-05-A	3,200 gal tank	\$83.00
N-96-411-0 thru N-96-417-0 (each)	3020-05-A	2,000 gal tank	\$83.00
N-96-418-0 thru N-96-423-0 (each)	3020-05-E	216,000 gal tank	\$270.00
N-96-424-0	3020-05-E	160,000 gal tank	\$270.00
N-96-425-0 thru N-96-426-0 (each)	3020-05-D	50,000 gal tank	\$203.00

Appendixes

- A: Draft ATCs
- B: BACT Guideline
- C: BACT Analysis
- D: Compliance Statement
- E: Quarterly Net Emissions Change

APPENDIX A
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-96-405-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #209) WITH
PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 6.5 feet in diameter and 14 feet in height with a proposed volume of 3,200 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

N-96-405-0 Mar 21 2018 7:41AM - SCW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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-96-406-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY

MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #210) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 6.5 feet in diameter and 14 feet in height with a proposed volume of 3,200 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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-96-407-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #211) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 6.5 feet in diameter and 14 feet in height with a proposed volume of 3,200 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] 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

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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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-96-408-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #212) WITH
PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 6.5 feet in diameter and 14 feet in height with a proposed volume of 3,200 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] 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

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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-96-409-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY

MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #213) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 6.5 feet in diameter and 14 feet in height with a proposed volume of 3,200 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] 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

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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB); U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-96-410-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
3,200 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #214) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 6.5 feet in diameter and 14 feet in height with a proposed volume of 3,200 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] 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-96-410-0 Mar 21 2018 7:41AM - SOW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-96-411-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #215) WITH
PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

N-96-411-0 Mar 21 2016 7:43AM - SOW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-96-412-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #216) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

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Arnaud Marjolle, Director of Permit Services
N-96-412-0 Mar 21 2018 7:41AM - SCW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-96-413-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #217) WITH
PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

N-96-413-0 Mar 21 2016 7:41AM - SOW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-96-414-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #218) WITH
PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] 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-96-414-0 Mar 21 2019 7:41AM - SOW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-96-415-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY

MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #219) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] 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-96-415-0 Mar 21 2019 7:43AM - SCW - Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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-96-416-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #220) WITH
PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-96-417-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
2,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #221) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 5.5 feet in diameter and 14 feet in height with a proposed volume of 2,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

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Arnaud Marjolle, Director of Permit Services
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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-96-418-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY

MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #717) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 30.0 feet in diameter and 40 feet in height with a proposed volume of 216,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 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

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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-96-419-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #718) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 30.0 feet in diameter and 40 feet in height with a proposed volume of 216,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

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Arnaud Marjolle, Director of Permit Services
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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-96-420-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #719) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 30.0 feet in diameter and 40 feet in height with a proposed volume of 216,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

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Arnaud Marjolle, Director of Permit Services
N-96-420-0 Mar 21 2018 7:41AM - SOW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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-96-421-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #720) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 30.0 feet in diameter and 40 feet in height with a proposed volume of 216,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 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
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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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-96-422-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #721) WITH
PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 30.0 feet in diameter and 40 feet in height with a proposed volume of 216,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 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
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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-96-423-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

216,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #722) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 30.0 feet in diameter and 40 feet in height with a proposed volume of 216,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 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
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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-96-424-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
160,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #729) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 26.0 feet in diameter and 40 feet in height with a proposed volume of 160,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 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-96-424-0, Mar 21 2018 7:41AM - SOW Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-96-425-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY
MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:
50,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #738) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 14.5 feet in diameter and 40 feet in height with a proposed volume of 50,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 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-96-425-0 May 21 2016 7:41AM - SCV - Joint Inspection NOT Required

6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-96-426-0

LEGAL OWNER OR OPERATOR: BEAR CREEK WINERY

MAILING ADDRESS: 11900 N FURRY RD
LODI, CA 95240

LOCATION: 11900 N FURRY RD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

50,000 GALLON NOMINAL STAINLESS STEEL ENCLOSED TOP WINE STORAGE TANK (TANK #739) WITH PRESSURE/VACUUM VALVE AND INSULATION

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. The nominal tank dimensions are 14.5 feet in diameter and 40 feet in height with a proposed volume of 50,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be used exclusively for wine storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 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

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6. The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. 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
7. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 20.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 242,165 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from wine storage operations shall be determined as the sum of the product of the volume of wine transferred in each wine movement and the batch-specific wine storage VOC emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The batch-specific wine storage VOC emission factor (EF), in pounds of VOC per 1,000 gallons of wine throughput, shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$, where P is the volume percent ethanol of the wine being transferred. [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. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. The operator shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12-month rolling period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. If the emissions calculated for any rolling 12-month period exceed the annual emissions 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 annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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
19. 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

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APPENDIX B
BACT Guideline 5.4.13

SJVAPCD
Best Available Control Technology (BACT) Guideline 5.4.13*
Last Update 9/26/2011

Wine Storage Tank - Non-Wood Material**

Pollutant	Achieved in Practice or contained in 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)	

*** This guideline is applicable to a wine storage tank that is not constructed out of wooden materials.*

**** 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**

APPENDIX C
Top-Down BACT Analysis

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 identifies the following Achieved in Practice and Technologically Feasible BACT options for wine storage tanks:

- 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. (Achieved in Practice)
- 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	Control	Overall Capture & Control Efficiency
1	Capture of VOCs and thermal or catalytic oxidation or equivalent	98%(*)
2	Capture of VOCs and carbon adsorption or equivalent	95%
3	Capture of VOCs and absorption or equivalent	90%
4	Capture of VOCs and condensation or equivalent	70%
5	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	Baseline (Achieved-in-Practice)

(*) Following recent District practice, thermal and catalytic oxidation will be ranked together.

Step 4 - Cost Effectiveness Analysis

A cost effective analysis must be performed for all control options that have not been determined to be achieved in practice in the list from Step 3 above, in the order of their ranking, to determine the cost effective option with the lowest emissions.

District BACT Policy APR 1305 establishes annual cost thresholds for imposed control based upon the amount of pollutants reduced by the controls. If the cost of control is at or below the threshold, it is considered a cost effective control. If the cost exceeds the threshold, it is not cost effective and the control is not required. Per District BACT Policy, the maximum cost limit for VOC reduction is \$17,500 per ton of VOC emissions reduced.

Uncontrolled VOC Emissions from the Storage Tanks

Bear Creek Winery proposes to install twenty-two wine storage tanks. Therefore, for the purposes of this cost effectiveness analysis, uncontrolled storage VOC emissions will be set equal to the total VOC emissions from these tanks.

Uncontrolled Storage PE = 5,561 lb-VOC/year (equivalent to 2.78 ton-VOC/year)

Total Annual Cost

Total Annual Cost = Cost of Control System + Annual Operating Cost + Ducting/Piping/CIP

The Total Annual Cost is the cumulative total of capital cost of control device, annual operating cost, plus the cost of ducting/piping/CIP. As a first step, if just using the partial cost of the ductwork plus CIP system is sufficient to show that the control option is not cost effective, additional cost may not be needed for the calculation purposes for this project.

Collection System Capital Investment (based on ductwork and clean-in-place system)

A common feature of all thermal oxidation/carbon adsorption/absorption or condensation options is that they require installation of a collection system for delivering the VOCs from the tanks to the common control device(s).

Basis of Cost Information:

- The costs for the ductwork and the required clean-in-place (CIP) system are based on information from the 2005 Eichleay Study. The 2005 Eichleay study was used in development of District Rule 4694 Wine Fermentation and Storage Tanks and includes substantial information on the costs and details of the potential application of VOC controls to wineries and addresses many of the technical issues of the general site specific factors for wineries.
- The District performed a cost survey of stainless steel ducting/piping and found that the values stated in the Eichleay report including the cost of inflation (applied as stated below) were less expensive; therefore, as a conservative estimate, the District will use the cost of ducting/piping from the Eichleay report which will include ducting, fittings, bolt up, handle, and install. A summary of the ducting/piping cost survey is included in Appendix C2.

- Eichleay's cost estimate for ducting included the duct, fittings, bolt up, handle and install; therefore, the District did not allow the additional costs for foundations & supports, handling & erection, electrical, piping or painting, as allowed by the EPA Cost Manual.
- The collection system consists of stainless steel place ductwork (stainless steel is required due to food grade product status) with isolation valving, connecting the 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 be included in the cost estimate.
- A minimum duct size is established at six inches diameter at each tank to provide adequate strength for spanning between supports.
- One of the major concerns of a manifold duct system is microorganisms spoiling the product, and transferring from one tank to another. It is necessary to design into the system a positive disconnect of the ducting system when the tanks are not being filled. There are a number of ways this can be done. In this case, an automatic butterfly valve with a physical spool to disconnect the tank from the duct will be utilized.
- The ducting/piping costs quoted in the Eichleay study are from 2005 and must be adjusted to reflect 2018 prices. An overall inflation amount of 29.98% which was taken from the United States Department of Labor, Bureau of Labor Statistics, Consumer Price Index (CPI) Inflation Calculator and applied to the ducting/piping costs to determine the current 2018 prices: http://www.bls.gov/data/inflation_calculator.htm.
- See Attachment C1 for tank farm ducting layouts.

Capital Cost of Ductwork

As detailed in the tank layout sketches in Attachment C1, the proposed tanks will be located very close to the existing tank farms, as a conservative estimate, only the small size pipe, 6" diameter pipe, will need be to use. The cost for the proposed twenty-two wine storage tanks is summarized below:

- Connection from set of tanks (717 thru 719) to the existing tank farm (6" Diameter): 109.5 feet x \$62.17/foot = \$6,808
- Connection from set of tanks (720 thru 722) to the existing tank farm (6" Diameter): 109.5 feet x \$62.17/foot = \$6,808
- Connection from tank 719 to tank 720 (6" Diameter): 38.42 feet x \$62.17/foot = \$2,389
- Connection from tank 729 to existing tank farm (6" Diameter): 28.5 feet x \$62.17/foot = \$1,772
- Connection from set of tanks (738 & 739) to existing tank farm (6" Diameter): 34.33 feet x \$62.17/foot = \$2,134
- Connection from set of tanks (209 thru 214) to the junction of pipe to the existing tank farm (6" Diameter): 48.42 feet x \$62.17/foot = \$3,010
- Connection from set of tanks (215 thru 221) to the junction of pipe to the existing tank farm (6" Diameter): 51.83 feet x \$62.17/foot = \$3,222
- Connection from set of tanks (209 thru 221) to the existing tank farm (6" Diameter): 26.67 feet x \$62.17/foot = \$1,658
- Ducting Isolation Components for tanks:
 - o Unit installed cost for 6 inch butterfly valve: \$2,125/valve x 22 valves = \$46,750
 - o Unit installed cost one foot removable spool: \$500/tank x 22 tanks = \$11,000
- Ducting support allowance:

- o Ducting support allowance is \$4,000/tank: \$4,000/tank x 22 tanks = \$88,000

$$\begin{aligned} \text{Total Ductwork Capital cost} &= \$6,808 + \$6,808 + \$2,389 + \$1,772 + \$2,134 + \$3,010 + \$3,222 \\ &\quad + \$1,658 + \$46,750 + \$11,000 + \$88,000 \\ &= \mathbf{\$173,551} \end{aligned}$$

Capital Cost of Ductwork for 22 Wine Storage Tanks	
Cost Description	Cost (\$)
Total Ductwork cost for all Tanks	\$173,551
Adjusting factor from 2005 dollars to present month in 2018 dollars (29.98% inflation)	1.2998
Inflation adjusted duct cost	\$225,582
The following cost data is taken from EPA Control Cost Manual, Sixth Edition (EPA/452/B-02-001).	
Direct Costs (DC)	
Base Equipment Costs (Ductwork) See Above	\$225,582
Instrumentation (not estimated)	-
Sales Tax 3.5625% ¹ of Base Equipment Costs	\$8,036
Freight 5% of Base Equipment Costs	\$11,279
Purchased Equipment Cost (PEC)	\$244,897
Foundations & supports (Included in Base Equipment Costs)	-
Handling & erection (Included in Base Equipment Costs)	-
Electrical (not required)	-
Piping (not required)	-
Painting (not required)	-
Insulation 1% of PEC	\$2,449
Direct installation costs	\$2,449
Total Direct Costs	\$247,346
Indirect Costs (IC)	
Engineering 10% of PEC	\$24,490
Construction and field expenses 5% of PEC	\$12,245
Contractor fees 10% of PEC	\$24,490
Start-up 2% of PEC	\$4,898
Performance test 1%	\$2,449
Total Indirect Costs	\$68,572
Subtotal Capital Investment (SCI) (DC + IC)	\$315,918
Contingencies – 15% of SCI	\$47,388
Total Capital Investment (TCI) (SCI + Contingency)	\$363,306

¹ Pollution control equipment may qualify for CA tax partial exemption. The exemption rate is 4.1875%, so the reduced sales tax rate for San Joaquin County equals 3.5625% (7.75% - 4.1875%).

<https://www.boe.ca.gov/lawguides/business/current/bllg/vol1/sutr/1525-4.html>

Capital Cost for Clean-In-Place (CIP) System

A ducting system on a winery tank farm must have a Clean in Place (CIP) system to maintain sanitation and quality of the product. The cost of operation of the CIP system has not been estimated. Operation of a CIP system, using typical cleaning agents, will raise disposal and wastewater treatment costs. Most likely, these costs will be significant. As a conservative estimate, only one CIP system is needed for the proposed twenty-two tanks.

Capital Cost of Clean-In-Place (CIP) System for 22 Wine Storage Tanks	
Cost Description	Cost (\$)
Cost of CIP system: \$200,000	\$200,000
The following cost data is taken from EPA Control Cost Manual, Sixth Edition (EPA/452/B-02-001).	
Direct Costs (DC)	
Base Equipment Costs (CIP System) See Above	\$200,000
Instrumentation - 10% of Base Equipment	\$20,000
Sales Tax - 3.5625% of Base Equipment	\$7,125
Freight - 5% of Base Equipment	\$10,000
Purchased Equipment Cost (PEC)	\$237,125
Foundations & supports - 8% of PEC	\$18,970
Handling & erection - 14% of PEC	\$33,198
Electrical - 4% of PEC	\$9,485
Piping – accounted for in ductwork cost	-
Painting - 1% of PEC	\$2,371
Insulation - 1% of PEC	\$2,371
Direct Installation Costs (DIC)	\$66,395
Total Direct Costs (DC) = (PEC + DIC)	\$303,520
Indirect Costs (IC)	
Engineering - 10% of PEC	\$23,713
Construction and field expenses - 5% of PEC	\$11,856
Contractor fees - 10% of PEC	\$23,713
Start-up - 2% of PEC	\$4,743
Performance test - 1% of PEC	\$2,371
Total Indirect Costs (IC)	\$66,396
Subtotal Capital Investment (SCI) = (DC + IC)	\$369,916
Contingencies - 15% of SCI	\$55,487
Total Capital Investment (TCI) (SCI + Contingency)	\$425,403

Annualized Capital Costs of Ductwork and CIP System for 24 Wine Storage Tanks

$$\begin{aligned}
 \text{Total Capital Cost} &= \text{Ductwork} + \text{CIP System} \\
 &= \$363,306 + \$425,403 \\
 &= \mathbf{\$788,709}
 \end{aligned}$$

The total capital investment is annualized over 10 years assuming 10% interest. The following formula is used to determine the annualized cost:

Annualized Capital Investment = Initial Capital Investment x Amortization Factor

$$\text{Amortization Factor} = \left[\frac{0.1(1.1)^{10}}{(1.1)^{10} - 1} \right] = 0.163 \text{ per District policy, amortizing over 10 years at 10\%}$$

Therefore,

$$\begin{aligned} \text{Annualized Capital Investment for the ductwork and CIP system} &= \$788,709 \times 0.163 \\ &= \mathbf{\$128,560/\text{year}} \end{aligned}$$

Option 1 - Capture of VOCs & thermal/catalytic oxidation or equivalent (overall capture & control efficiency of 98%)

Total Annual Cost

As calculated above, the annualized capital cost for the collection system ductwork equipment alone is \$128,560.

Emissions Reduction:

The amount of VOC emissions controlled for this control option is calculated as follow:

$$\begin{aligned} \text{Controlled VOC emissions} &= 5,561 \text{ lb-VOC/year} \times 1 \text{ tons-VOC}/2,000 \text{ lb-VOC} \times 0.98 \\ &= 2.72 \text{ ton-VOC/year} \end{aligned}$$

Cost Effectiveness:

Cost of VOC reduction is calculated as follow:

$$\begin{aligned} \text{Cost of VOC reduction} &= \$128,560/\text{year} \div 2.72 \text{ ton-VOC/year} \\ &= \$47,265/\text{ton-VOC} \end{aligned}$$

The analysis demonstrates that the annualized purchase cost of the required collection system ductwork equipment alone results in a cost effectiveness which exceeds the District's BACT cost effectiveness threshold of \$17,500/ton of VOC. Therefore, this control option is not cost-effective and will not be considered for this project.

Option 2 - Capture of VOCs and carbon adsorption or equivalent (overall capture & control efficiency of 95%)

Total Annual Cost

As calculated above, the annualized capital cost for the collection system ductwork equipment alone is \$128,560.

Emissions Reduction:

The amount of VOC emissions controlled for this control option is calculated as follow:

$$\begin{aligned}\text{Controlled VOC emissions} &= 5,561 \text{ lb-VOC/year} \times 1 \text{ tons-VOC}/2,000 \text{ lb-VOC} \times 0.95 \\ &= 2.64 \text{ ton-VOC/year}\end{aligned}$$

Cost Effectiveness:

Cost of VOC reduction is calculated as follow:

$$\begin{aligned}\text{Cost of VOC reduction} &= \$128,560/\text{year} \div 2.64 \text{ ton-VOC/year} \\ &= \$48,697/\text{ton-VOC}\end{aligned}$$

The analysis demonstrates that the annualized purchase cost of the required collection system ductwork equipment alone results in a cost effectiveness which exceeds the District's BACT cost effectiveness threshold of \$17,500/ton of VOC. Therefore, this control option is not cost-effective and will not be considered for this project.

Option 3 - Capture of VOCs and absorption or equivalent (overall capture & control efficiency of 90%)

Total Annual Cost

As calculated above, the annualized capital cost for the collection system ductwork equipment alone is \$128,560.

Emissions Reduction:

The amount of VOC emissions controlled for this control option is calculated as follow:

$$\begin{aligned}\text{Controlled VOC emissions} &= 5,561 \text{ lb-VOC/year} \times 1 \text{ tons-VOC}/2,000 \text{ lb-VOC} \times 0.90 \\ &= 2.50 \text{ ton-VOC/year}\end{aligned}$$

Cost Effectiveness:

Cost of VOC reduction is calculated as follow:

$$\begin{aligned}\text{Cost of VOC reduction} &= \$128,560/\text{year} \div 2.50 \text{ ton-VOC/year} \\ &= \$51,424/\text{ton-VOC}\end{aligned}$$

The analysis demonstrates that the annualized purchase cost of the required collection system ductwork equipment alone results in a cost effectiveness which exceeds the District's BACT cost effectiveness threshold of \$17,500/ton of VOC. Therefore, this control option is not cost-effective and will not be considered for this project.

Option 4 – Capture of VOCs and condensation or equivalent (overall capture & control efficiency of 70%)

Total Annual Cost

As calculated above, the annualized capital cost for the collection system ductwork equipment alone is \$128,560.

Emissions Reduction:

The amount of VOC emissions controlled for this control option is calculated as follow:

$$\begin{aligned}\text{Controlled VOC emissions} &= 5,561 \text{ lb-VOC/year} \times 1 \text{ tons-VOC}/2,000 \text{ lb-VOC} \times 0.70 \\ &= 1.95 \text{ ton-VOC/year}\end{aligned}$$

Cost Effectiveness:

Cost of VOC reduction is calculated as follow:

$$\begin{aligned}\text{Cost of VOC reduction} &= \$128,560/\text{year} \div 1.95 \text{ ton-VOC/year} \\ &= \$65,928/\text{ton-VOC}\end{aligned}$$

The analysis demonstrates that the annualized purchase cost of the required collection system ductwork equipment alone results in a cost effectiveness which exceeds the District's BACT cost effectiveness threshold of \$17,500/ton of VOC. Therefore, this control option is not cost-effective and will not be considered for this project.

Option 5 – Insulation, PVRV, “Gas-Tight” Tank Operation, and Storage Temperature not Exceeding 75 deg F, Achieved within 60 days of Completion of Fermentation

The only remaining control option in step 3 above has been deemed AIP for this class and category of source and per the District BACT policy is required regardless of the cost. Therefore, a cost effectiveness analysis is not required.

Step 5 - Select BACT

All identified feasible options with control efficiencies higher than the option proposed by the facility are not cost effective. Each of the proposed wine storage tanks is insulated and is equipped with pressure/vacuum valve set within 10% of the maximum allowable working pressure of the tank, and is being operated “gas tight” tank operation. The applicant has proposed to maintain a continuous storage temperature at or below 75°F. Therefore, this proposal complies with the BACT requirements.

APPENDIX C1

Tank Farms Layouts



PROJECT: TANK PLATFORM ADDITION
OWNER: GOLDSTONE LAND COMPANY, LLC
LOCATION: 11900 N. FURRY ROAD, LODI, CA
(TANKS #729, #738 & #739)

PROJECT	17058B
SHEET NUMBER	T3
DATE	
BY	
CHECKED BY	
DATE	
SCALE	

1. ALL THE TANKS OF CONSTRUCTION, THE PROJECT'S TANKS, SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

2. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

3. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

4. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

5. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

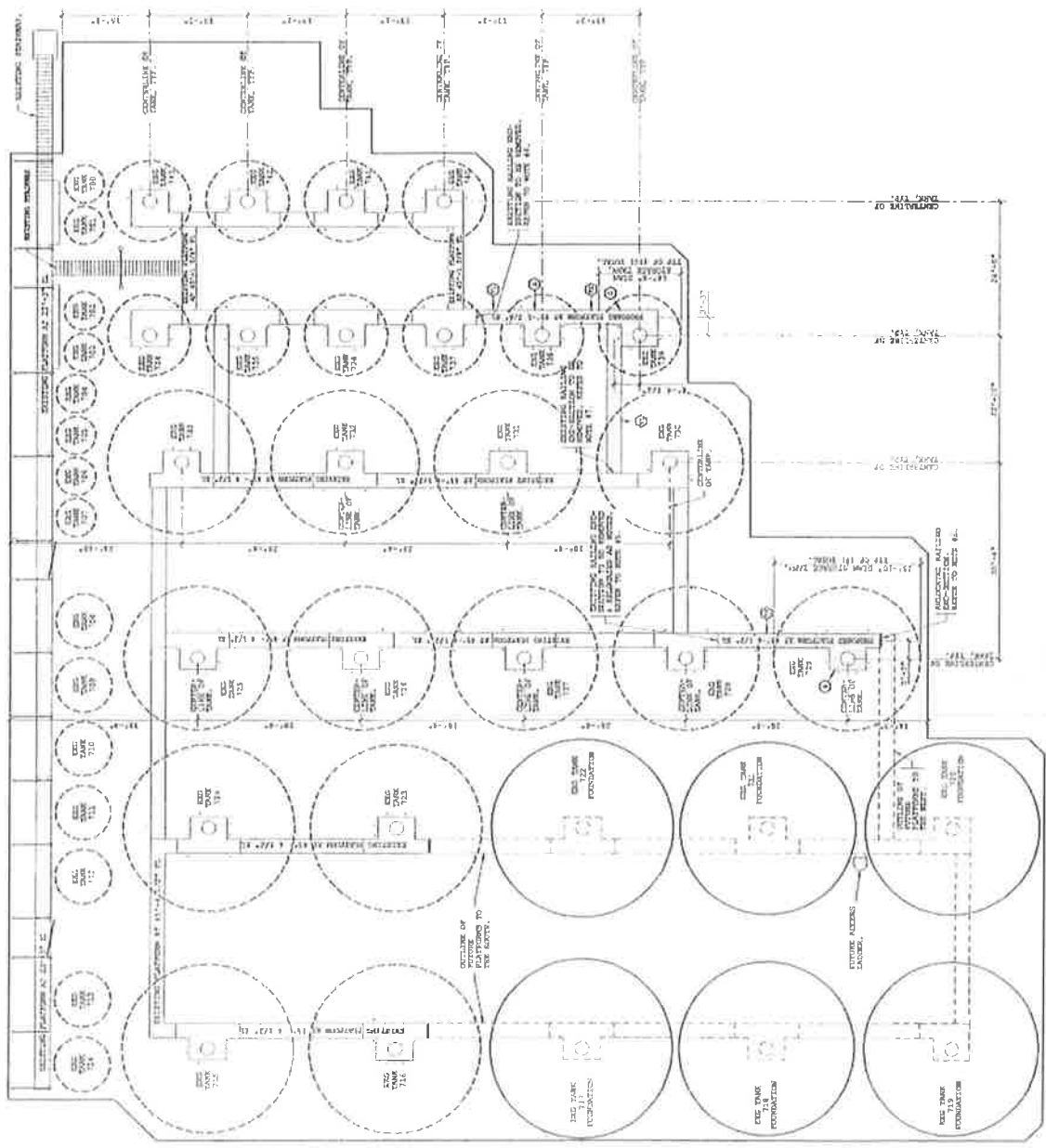
6. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

7. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

8. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

9. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.

10. THE TANKS SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA TANK CODE, AS APPLICABLE TO THE PROJECT.



TANK PLATFORM LAYOUT PLAN
SCALE: 1/8" = 1'-0"



NOTE; VERIFY WITH SAN JOAQUIN COUNTY'S APPROVED PROJECT'S DRAWINGS.

APPENDIX C2
Ducting Cost Survey

APPENDIX D
Compliance Statement



February 26, 2018

Mr. Nick Peirce
San Joaquin Valley Air Pollution Control District
4800 Enterprise Way
Modesto, CA 95356-8718

Subject: Compliance Statement for Bear Creek Winery

Dear Mr. Peirce:

In accordance with District Rule 2201, Section 4.15, "Additional Requirements for New Major Sources and Federal Major Modifications," Bear Creek Winery (N-96) is pleased to provide this compliance statement regarding its proposed production of red and white table wines, as well as other specialty wine products, project N-1173637

All major stationary sources in California owned or operated by Bear Creek Winery, or by any entity controlling, controlled by, or under common control with Bear Creek 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:

Bear Creek Winery
11900 N. Furry Road
Lodi, CA 95240
BW-CA-3865
209-368-3113

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 compliance statement.

Sincerely,

A handwritten signature in black ink, appearing to read "David Crippen".

David Crippen, Director of Winemaking
Bear Creek Winery

APPENDIX E
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$NEC_{SLC} = [PE2_{SLC} - PE1_{SLC}] \div 4$, where:

NEC_{SLC} = Quarterly Net Emissions Change for units covered by the SLC.

$PE2_{SLC}$ = PE2 for all units covered by the SLC.

$PE1_{SLC}$ = PE1 for all units covered by the SLC.

$NEC_{SLC} = [PE2_{SLC} - PE1_{SLC}] \div 4$
 $= [242,165_{SLC} - 242,165_{SLC}] \div 4$

Quarterly NEC [QNEC]			
Pollutant	PE2 _{SLC}	PE1 _{SLC}	NEC _{SLC}
VOC	242,165	242,165	0