

JUL 09 2018

Adam Wenz
E & J Gallo Winery
18000 W River Rd
Livingston, CA 95334

RE: Notice of Final Action - Authority to Construct
Facility Number: N-1237
Project Number: N-1162653

Dear Mr. Wenz:

The Air Pollution Control Officer has issued the Authority to Construct permits to E & J Gallo Winery for the modification of 8 wine/distilled spirits storage tanks to add red and white wine fermentation service and establish a combined annual volatile organic compound (VOC) emission limit for the 8 tanks, at 18000 W River Rd, Livingston, CA. Enclosed are the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter. As discussed below, E & J Gallo Winery must not begin construction until applying for, and receiving, a final Part 70 (Title V) permit amendment.

Please be aware that EPA has expressed concern about your project with respect to federal Lowest Achievable Emission Rate (LAER) requirements for new and modified fermentation tanks. While the District believes it has fully demonstrated that your proposal complies with all federal, state, and local permitting requirements, it is evident that additional time would be beneficial to allow further discussions on this issue. Therefore, the District has issued these Authority to Construct permits without Certificates of Conformity with Part 70 (Title V) permitting requirements, with the intent that EPA, the District, and other interested parties work together to resolve these LAER concerns so that the District may issue at a later date your facility's Title V permit without EPA objection.

Also, please be aware that your project triggers a significant permit modification to the Title V permit and a final Part 70 permit amendment has not been issued for this proposal. Pursuant to Section 6.3 of District Rule 2520, a source may implement the changes addressed in the request for a significant permit modification only after a final Part 70 permit amendment is issued by the District. Therefore, you may not begin construction of the proposed tanks until the Part 70 permit amendment is issued.

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Mr. Adam Wenz
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Notice of the District's preliminary decision to issue the Authority to Construct permits was published on April 26, 2017. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on April 21, 2017. All comments received following the District's preliminary decision on this project were considered. A summary of the comments and the District's response to each comment is included as an attachment to this letter.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas at (559) 230-6000.

Sincerely,


Arnaud Marjollet
Director of Permit Services

AM:jag

Enclosures

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

Public Comments / District Responses

Public comments regarding the preliminary decision for E & J Gallo Winery's (District facility N-1237) proposed project are provided below followed by the District's responses.

NohBell Comment #1:

We believe your calculation regarding cost/ton needlessly and excessively adds a cost burden that is based upon:

- a. Elected upgrades and options not needed for the functioning of the system.
- b. Additional expenditures and ancillary equipment not needed for the system.
- c. Erroneous and duplicate addition of cost.

District Response to NohBell Comment #1:

The District performed a project specific cost effectiveness analysis of all alternative control technologies pursuant to District Policy APR 1305, Best Available Control Technology (BACT) Policy. A justification for all cost, required for a fully functioning control device, used in the analysis was provided in Appendix B of the application review in the public notice package.

NohBell Comment #2:

We believe that our NoMoVo system has been established as Achieved in Practice, as documented here by the Air Recourse board [for an installation at Central Coast Wine Services in 2013]. <https://www.arb.ca.gov/bact/bactnew/determination.php?var=1040>

District Response to NohBell Comment #2:

In Attachment B1 of the application review in the public notice package, the District included an achieved in practice analysis entitled "Achieved in Practice Analysis for Emission Control Technologies Used to Control VOC Emissions from Wine Fermentation Tanks". In the document it was determined that the installation at Central Coast Wine Services in 2013 has not demonstrated to operate in a manner that would be required by BACT and the overall effectiveness of the control technology has yet to be sufficiently determined; therefore, the District does not consider the installation to be achieved in practice.

NohBell Comment #3:

We believe that the EPA has determined our NoMoVo system as achieved in practice [included attachment of EPA's comments on Projects N-1153192, N-1143210, N-1152244, N-1142303].

District Response to NohBell Comment #3:

The District responded to those comments in each of the previous permitting actions and have determined that controls for VOC emissions from wine fermentation tanks is not achieved in practice.

NohBell Comment #4:

We further believe that this ATC does not equate a permit to operate which will be under review involving Title V.

District Response to NohBell Comment #4:

The Authority to Construct permits issued are without Certificates of Conformity with Part 70 (Title V) permitting requirements. The project triggers a significant permit modification to the Title V permit and pursuant to Sections 6.3 and 11.3.1 of District Rule 2520, a source may implement the changes addressed in the request for a significant permit modification only after a final Part 70 permit amendment is issued by the District after EPA review and a 30-day public comment period.

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-776-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL (5,961 GALLON GAUGE) INSULATED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (TANK D601) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-776-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 322 lb, and fourth quarter - 323 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

N-1237-776-1 Jul 9 2018 9:17AM - GARCIAJ Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 95.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 5,961 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of nominal tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 20.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per } 1000 \text{ gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per } 1000 \text{ gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. For concentrations greater than 24 volume % up to and including 66 volume%, $a = -0.42159$, $b = 0.91316$ and $c = 0.016237$. For concentrations greater than 66 volume % up to and including 92 volume %, $a = 1.3799$, $b = -1.5774$ and $c = 0.87906$. For concentrations greater than 92 volume % up to and including 100 volume %, $a = 6.6071$, $b = -10.651$ and $c = 4.806$. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (lb-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the emissions calculated for any rolling 12-month period exceeds the annual emissions limitation 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
26. 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
27. 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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-777-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL INSULATED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (TANK D602) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-777-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 322 lb, and fourth quarter - 323 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services
N-1237-777-1 Jul 9 2018 9:17AM - GARCIAJ Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 95.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 60,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 20.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per } 1000 \text{ gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per } 1000 \text{ gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. For concentrations greater than 24 volume % up to and including 66 volume%, $a = -0.42159$, $b = 0.91316$ and $c = 0.016237$. For concentrations greater than 66 volume % up to and including 92 volume %, $a = 1.3799$, $b = -1.5774$ and $c = 0.87906$. For concentrations greater than 92 volume % up to and including 100 volume %, $a = 6.6071$, $b = -10.651$ and $c = 4.806$. [District Rule 2201] Federally Enforceable Through Title V Permit

19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (lb-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
26. 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
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AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-778-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

MODIFICATION OF 3,500 GALLON NOMINAL INSULATED AND GLYCOL JACKETED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (TANK D301) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-778-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 185 lb, and fourth quarter - 186 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
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Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

N-1237-778-1 Jul 9 2018 9:17AM -- GARCIAJ : Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 95.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 35,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 12.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per 1000 gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per 1000 gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. For concentrations greater than 24 volume % up to and including 66 volume%, $a = -0.42159$, $b = 0.91316$ and $c = 0.016237$. For concentrations greater than 66 volume % up to and including 92 volume %, $a = 1.3799$, $b = -1.5774$ and $c = 0.87906$. For concentrations greater than 92 volume % up to and including 100 volume %, $a = 6.6071$, $b = -10.651$ and $c = 4.806$. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (lb-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the emissions calculated for any rolling 12-month period exceeds the annual emissions limitation 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
26. 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
27. 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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-779-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

MODIFICATION OF 3,500 GALLON NOMINAL INSULATED AND GLYCOL JACKETED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (TANK D302) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-779-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 185 lb, and fourth quarter - 186 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services
N-1237-779-1 Jul 9 2018 9:17AM - GARCIAJ Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 95.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 35,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 12.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per } 1000 \text{ gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per } 1000 \text{ gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. For concentrations greater than 24 volume % up to and including 66 volume%, $a = -0.42159$, $b = 0.91316$ and $c = 0.016237$. For concentrations greater than 66 volume % up to and including 92 volume %, $a = 1.3799$, $b = -1.5774$ and $c = 0.87906$. For concentrations greater than 92 volume % up to and including 100 volume %, $a = 6.6071$, $b = -10.651$ and $c = 4.806$. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (lb-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the emissions calculated for any rolling 12-month period exceeds the annual emissions limitation 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
26. 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
27. 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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-780-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

MODIFICATION OF 3,500 GALLON NOMINAL INSULATED AND GLYCOL JACKETED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (TANK D303) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-780-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 185 lb, and fourth quarter - 186 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services
N-1237-780-1 Jul 9 2018 9:17AM - GARCIAJ - Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 95.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 35,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 12.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per } 1000 \text{ gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per } 1000 \text{ gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. For concentrations greater than 24 volume % up to and including 66 volume%, $a = -0.42159$, $b = 0.91316$ and $c = 0.016237$. For concentrations greater than 66 volume % up to and including 92 volume %, $a = 1.3799$, $b = -1.5774$ and $c = 0.87906$. For concentrations greater than 92 volume % up to and including 100 volume %, $a = 6.6071$, $b = -10.651$ and $c = 4.806$. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (1b-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the emissions calculated for any rolling 12-month period exceeds the annual emissions limitation 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
26. 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
27. 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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-783-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL INSULATED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (TANK D603) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-783-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 293 lb, and fourth quarter - 294 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

N-1237-783-1 Jul 9 2018 9 17AM - GARCIAJ Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 95.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 6,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 20.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per } 1000 \text{ gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per } 1000 \text{ gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. For concentrations greater than 24 volume % up to and including 66 volume%, $a = -0.42159$, $b = 0.91316$ and $c = 0.016237$. For concentrations greater than 66 volume % up to and including 92 volume %, $a = 1.3799$, $b = -1.5774$ and $c = 0.87906$. For concentrations greater than 92 volume % up to and including 100 volume %, $a = 6.6071$, $b = -10.651$ and $c = 4.806$. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (lb-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the emissions calculated for any rolling 12-month period exceeds the annual emissions limitation 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
26. 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
27. 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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-784-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL INSULATED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (TANK D604) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-784-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 293 lb, and fourth quarter - 294 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

N-1237-784-1 Jul 9 2018 9:17AM - GARCIAJ : Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 95.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 6,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 20.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per } 1000 \text{ gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per } 1000 \text{ gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. For concentrations greater than 24 volume % up to and including 66 volume%, $a = -0.42159$, $b = 0.91316$ and $c = 0.016237$. For concentrations greater than 66 volume % up to and including 92 volume %, $a = 1.3799$, $b = -1.5774$ and $c = 0.87906$. For concentrations greater than 92 volume % up to and including 100 volume %, $a = 6.6071$, $b = -10.651$ and $c = 4.806$. [District Rule 2201] Federally Enforceable Through Title V Permit

19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (lb-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the emissions calculated for any rolling 12-month period exceeds the annual emissions limitation 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
26. 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
27. 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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-785-1

ISSUANCE DATE: 07/09/2018

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

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:
MODIFICATION OF 20,000 GALLON NOMINAL INSULATED STAINLESS STEEL WINE AND DISTILLED SPIRITS STORAGE TANK (D201) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD RED AND WHITE WINE FERMENTATION SERVICE AND ESTABLISH A COMBINED ANNUAL VOC EMISSION LIMIT FROM THE 8 TANKS IN THE CDF/PILOT WINERY SLC #3

CONDITIONS

1. The permittee shall not implement the changes authorized in this Authority to Construct until a final Part 70 permit amendment is issued by the District. [District Rule 2520, 6.3] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) N-1237-785-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating under the modifications authorized by this ATC, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 0 lb, 2nd quarter - 0 lb, 3rd quarter - 1,153 lb, and fourth quarter - 1,154 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Numbers S-4727-1, C-1404-1, S-4751-1, S-4442-1, S-4773-1, S-4780-1, or S-4769-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services
N-1237-785-1 Jul 9 2018 9:17AM - GARCIAJ : Joint Inspection NOT Required

6. For the purposes of this permit, the "CDF/Pilot Winery SLC #3" shall consist of the following 8 winery tank permits: N-1237-776 through -780 and -783 through -785. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for storage, 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
8. When this tank is used for storage, 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
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The ethanol content of wine/spirits stored in this tank shall not exceed 24.0 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The daily wine/spirits storage throughput in this tank shall not exceed 20,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The daily VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The daily VOC emissions from wine fermentation in this tank shall not exceed 69.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total combined annual VOC emissions from all fermentation and storage operations from all tanks within the CDF/Pilot Winery SLC #3, calculated on a rolling 12-month basis, shall not exceed 7,486 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Annual VOC emissions from wine fermentation in this tank, calculated on a 12 month rolling basis, shall be determined by the following formula: $E = 6.2 \text{ lb per } 1000 \text{ gallons} \times \text{annual red wine production (in gallons)} + 2.5 \text{ lb per } 1000 \text{ gallons} \times \text{annual white wine production (in gallons)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from storage operations shall be determined either as the sum of the emissions for each individual wine/spirits movement based on the volume transferred in each wine/spirits movement and the batch-specific storage emission factor calculated using the equation(s) specified within this permit; or as the emissions for total annual wine/spirits movements and a single storage emissions factor, calculated using the equation(s) specified within this permit, based on the average ethanol content of the total annual wine/spirits movements. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The annual VOC wine/spirits storage emission factor for each wine/spirits ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1,000 gallons of wine/spirits throughput; P is the volume percent ethanol of the wine/spirits being transferred. For concentrations up to and including 24 volume %, $a = -0.38194$; $b = 0.97917$; and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
19. All wine fermented in this tank shall be subject to the fermentation tank emission reduction measures of District Rule 4694 with actual production in this tank included in the minimum facility-wide fermentation emission reduction of 35% pursuant to District Rule 4694. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. On a monthly basis, the permittee shall calculate and record the combined VOC emissions from all fermentation and storage operations, in pounds, from the tanks within the CDF/Pilot Winery SLC #3 for the rolling 12-month period, including calculation methods and parameters used. The VOC emissions shall be calculated by summing the VOC emissions from the previous 12 months from each tank. [District Rule 2201] Federally Enforceable Through Title V Permit
21. When this tank is used for wine storage, the operator shall determine and record, on a weekly basis, the total gallons of wine stored in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
22. When this tank is used for storage, 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
23. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
24. The permittee 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 ethanol concentration of each wine/spirits movement; the calculated rolling 12-month wine/spirits ethanol content; and the calculated rolling 12-month VOC emission rate from the CDF/Pilot Winery SLC #3 (lb-VOC per rolling 12-month period, calculated monthly). [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
25. If the emissions calculated for any rolling 12-month period exceeds the annual emissions limitation 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
26. 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
27. 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