San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUG 15 2018

William Nakata
ASV Wines, Inc.
1998 Road 152
Delano, CA 93215

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: S-7048
Project Number: S-1173620

Dear Mr. Nakata:

Enclosed for your review and comment is the District's analysis of ASV Wines, Inc.'s application for an Authority to Construct for the installation of two new wine storage tanks located in a temperature controlled building, and the increase in the combined annual wine storage VOC emission limit shared by existing units S-7048-158 through -165 and new units -229 and -230, at 31502 Peterson Rd, McFarland.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and 45-day EPA notice comment periods, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Derek Fukuda of Permit Services at (559) 230-5917.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:df

Enclosures

cc: Tung Le, CARB (w/ enclosure) via email
cc: Gerardo C. Rios, EPA (w/ enclosure) via email
cc: Ryan Hansen, ASV Wines, Inc. (w/ enclosure) via email

Samir Sheikh
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San Joaquin Valley Air Pollution Control District

Authority to Construct Application Review

Wine Storage Tanks

Facility Name:	ASV Wines, Inc.	Date:	July 27, 2018
Mailing Address:	1998 Road 152 Delano, CA 93215	Engineer:	Derek Fukuda
		Lead Engineer:	Jerry Sandhu
Contact Person:	Ryan Hansen		
Telephone:	(661) 792-5927		
Cell:	(661) 474-0293		
E-Mail:	rhansen@asvwines.com		
Application #s:	S-7048-158-5, -159-5, -160-4 through -165-4, -229-0, and -230-0		
Project #:	S-1173620		
Deemed Complete:	November 17, 2017		

I. Proposal

ASV Wines, Inc. has requested Authority to Construct (ATC) permits for the installation of two new 5,000 gallon stainless steel wine storage tanks (units -229-0 and -230-0) located in a temperature controlled building. In addition, the facility is proposing to include the two new wine storage tanks in an existing Specific Limiting Condition (SLC), which limits the combined annual wine storage throughput of permit units S-7048-158 through -165 to 4,200,000 gallons per year. The current Permits to Operate (PTOs) for these existing units are included in Appendix A. Due to the addition of the two new wine storage tanks in the existing SLC, the facility has also proposed to change the annual SLC limit from gallons per year to lb-VOC per year, and increase the annual VOC emissions of the existing SLC. The existing SLC limit of 4,200,000 gallons per year was based on annual emissions of 616 lb-VOC/year. The proposed SLC limit is 994 lb-VOC per year.

ASV Wines, Inc. received their Title V Permit on October 31, 2012. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the ATC permits. ASV Wines, Inc. must apply to administratively amend their Title V permit.

II. Applicable Rules

District Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
District Rule 2410	Prevention of Significant Deterioration (6/16/11)
District Rule 2520	Federally Mandated Operating Permits (6/21/01)
District Rule 4001	New Source Performance Standards (4/14/99)

District Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)
District Rule 4101 Visible Emissions (2/17/05)
District Rule 4102 Nuisance (12/17/92)
District Rule 4623 Storage of Organic Liquids (5/19/05)
District Rule 4694 Wine Fermentation and Storage Tanks (12/15/05)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The facility is located at 31502 Peterson Rd in McFarland, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

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

After transfer of the must (for red or white wine) to the fermentation tank, the must is inoculated with yeast which initiates the fermentation reactions. During fermentation, the yeast metabolizes the sugar in the grape juice, converting it to ethanol and carbon dioxide (CO_2) while releasing heat. Temperature is typically controlled by refrigeration, and is maintained at 45–65 °F for white wine fermentation and 70–95 °F for red wine fermentation. The sugar content of the fermentation mass is measured in °Brix (weight %) and is typically 22–26° for unfermented grape juice, dropping to 4° or less at the end of fermentation. Finished ethanol concentration is approximately 10 to 14 percent by volume. Batch fermentation requires 3-5 days per batch for red wine and 1-2 weeks per batch for white wine. VOCs are emitted during the fermentation process along with the CO_2. The VOCs consist primarily of ethanol along with small quantities of other fermentation byproducts.

Following the completion of fermentation, white wine is transferred directly to storage tanks. Red wine is first directed to the presses for separation of solids and then routed to the storage tanks. Tanks can potentially operate in either: (1) a fermentation operation during which the tank is vented directly to the atmosphere to release the evolved CO_2 byproduct from the fermentation reaction; (2) a storage operation during which the tank is closed to minimize contact with air and refrigerated to preserve the wine; (3) or both fermentation and storage operations. Post-fermentation operations such as cold stabilization, racking, and filtration are conducted in the tanks, resulting in a number of inter-tank transfers during the period between the end of fermentation and bottling or bulk shipment. Storage operations are conducted year-round. VOC emissions occur primarily as a result of the inter-tank transfers which are necessitated by the post fermentation operations.

ASV Wines, Inc. is proposing to install two new wine storage tanks and modify an existing SLC, which will affect eight existing wine storage tanks with this project. All the tanks being installed or modified in this project will only be used for wine storage and will not be used for fermentation operations. The tanks will only store wine once the fermentation process is completed in previously permitted tanks operated at this facility.

V. Equipment Listing

This project consists of the installation of two new wine storage tanks and the modification to eight existing wine storage tanks. The equipment description for the two new wine storage tanks will be included in the Post-Project Equipment Description listing below.

Pre-Project Equipment Description:

S-7048-158-4: 9,385 GALLON STEEL WINE STORAGE TANK #2001 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-159-4: 9,385 GALLON STEEL WINE STORAGE TANK #2002 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-160-3: 9,385 GALLON STEEL WINE STORAGE TANK #2003 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-161-3: 9,385 GALLON STEEL WINE STORAGE TANK #2004 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-162-3: 9,385 GALLON STEEL WINE STORAGE TANK #2005 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-163-3: 9,385 GALLON STEEL WINE STORAGE TANK #2006 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-164-3: 9,385 GALLON STEEL WINE STORAGE TANK #2007 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-165-3: 9,385 GALLON STEEL WINE STORAGE TANK #2008 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

Proposed Modification:

The facility has proposed to include two new wine storage tanks (units -229 and -230) in the existing SLC, and increase the existing SLC annual wine storage throughput limit.

S-7048-158-5: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2001 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

S-7048-159-5: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2002 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

S-7048-160-4: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2003 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

S-7048-161-4: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2004 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

S-7048-162-4: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2005 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

S-7048-163-4: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2006 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

S-7048-164-4: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2007 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

S-7048-165-4: MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2008 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

Post-Project Equipment Description:

S-7048-158-5: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2001 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-159-5: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2002 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-160-4: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2003 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-161-4: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2004 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-162-4: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2005 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-163-4: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2006 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-164-4: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2007 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-165-4: 9,385 GALLON NOMINAL (9,390 GALLON GUAGE) STEEL WINE STORAGE TANK #2008 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

New Wine Storage Tanks:

S-7048-229-0: 5,000 GALLON NOMINAL STEEL WINE STORAGE TANK #2009 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

S-7048-230-0: 5,000 GALLON NOMINAL STEEL WINE STORAGE TANK #2010 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

As a mechanism to ensure compliance with the tanks volumes, the following condition will be placed on ATC permits -229-0 and -230-0:

- The nominal tank dimensions are 7.3 feet in diameter and 17 feet in height with a proposed volume of 5,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201]

VI. Emission Control Technology Evaluation

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

VII. General Calculations

A. Assumptions

- All tanks in this project are only used for red and white wine storage.
- Typically, for enclosed tanks with insulation (or equivalent) and P/V valves, breathing losses from storage of wine are assumed to be negligible.
- Storage tank daily and annual maximum ethanol content of stored wine is 20% (proposed by the applicant)
- Pre and post-project maximum daily throughput of the existing tanks (units -158 through -165) = 20,000 gallons/day (existing permits)
- Maximum daily throughput of the two new tanks (units -229 and -230) = 20,000 gallons/day (proposed by the applicant)
- Pre-project annual wine storage throughput SLC limit = 4,200,000 gallons/year (equivalent to 616 lb-VOC/year) (existing permits)
- Post-project annual wine storage SLC emissions limit = 994 lb-VOC/year (equivalent to 5,097,436 gallons/year) (proposed by the applicant)

  Post-project SLC = (994 lb-VOC/year) ÷ (0.195 lb-VOC/1000-gal)
  = 5,097,436 gallons/year

B. Emission Factors

Units -158-4, -159-4, and -160-3 through -165-3:

The pre-project daily and annual emissions for existing units in this project were calculated based on a series of TANKS 4.0d runs and are shown in the table below. The TANKS runs determined the daily and annual emissions from each individual tank. The annual emissions from all the units were summed and the total became the annual SLC for units -158 through -165. However, as discussed in more detail below, the more conservative District-established emission factor for daily and annual wine storage emissions will be used to determine pre-project potential emissions for the existing units in this project.

Emission Factors Project S-1152957				
Wine Type	Vol% Ethanol	EF (lb-VOC/1,000 gallon of wine)		Source
		Daily	Annual	
White/Red	20.0	0.25	0.147	Project S-1152957

Units -158-5, -159-5, -160-4 through -165-4, and -229-0 and -230-0:

The post-project daily and annual emissions for the new and existing units in this project are calculated using District-established emission factors based on TANKS 4.0d runs. The District-established emission factor differs from the pre-project emissions by generalizing the conditions and operation of the storage tanks to determine a conservative emission factor. Since the new tanks in this project are a different volume than the existing tanks, and there are no individual annual throughput limits on the existing tanks, the District-established emission factor will be used to determine emissions from the new and modified units in this project.

Since both the pre and post-project emission factors for existing units in this project were calculated based on TANKS 4.0d runs, the more conservative emission factor (District-established emission factor) will be used for pre and post-project emission calculations. The pre and post-project emission factors are shown in the following table:

Pre and Post-Project Emission Factor				
Wine Type	Vol% Ethanol	EF (lb-VOC/1,000 gallon of wine)		Source
		Daily	Annual	
White/Red	20.0	0.368	0.195	District-Established Emission Factor

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Units -158-4, -159-4, and -160-3 through -165-3:

Daily PE1:

As stated in the Emission Factor Section, the daily pre-project emissions from the existing units will be recalculated using the District-established emission factor for wine storage tanks and the daily wine storage throughput limits each permit.

Daily VOC PE1 = EF (lb-VOC/1,000 lb gallons) x Throughput (gallons/day)

PE1			
Permit Unit	**EF (lb-VOC/1000 gal)**	**Daily Throughput (gal/day)**	**Daily PE1 (lb/day)**
S-7048-158-4	0.368	20,000	7.4
S-7048-159-4			7.4
S-7048-160-3			7.4
S-7048-161-3			7.4
S-7048-162-3			7.4
S-7048-163-3			7.4
S-7048-164-3			7.4
S-7048-165-3			7.4

Annual PE1:

The combined annual PE1 for the existing units being modified in this project are limited by an existing annual throughput SLC of 4,200,000 gallons of wine storage. Since the pre-project emission factor is being revised in this project, the existing annual wine storage throughput SLC will result in a different PE than the PE calculated in the previous permitting project (S-1152957). However, in the previous project, the facility provided Emission Reduction Credits (ERCs) to offset emission increases; therefore, the combined annual PE1 for the existing units will be based on the PE1 calculated in project S-1152957 and not a recalculated value using the existing throughput SLC and revised emission factor. The PE for the combined annual SLC for the existing units is shown in the table below:

PE1	
Permit Units	**Annual PE1 (lb/year)**
S-7048-158-4, -159-4, and -160-3 through -165-3	616

Units S-7048-229-0 and -230-0:

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

2. Post-Project Potential to Emit (PE2)

Daily PE2:

Units -158-5, -159-5, -160-4 through -165-4, -229-0, and -230-0:

The daily post-project emissions from the units in this project will be calculated using the District-established emission factor for wine storage tanks and the proposed daily wine storage throughput limit for each unit.

Daily VOC PE2 = EF (lb-VOC/1,000 lb gallons) x Throughput (gallons/day)

PE2			
Permit Unit	**EF (lb-VOC/1000 gal)**	**Daily Throughput (gal/day)**	**Daily PE2 (lb/day)**
S-7048-158-5	0.368	20,000	7.4
S-7048-159-5			7.4
S-7048-160-4			7.4
S-7048-161-4			7.4
S-7048-162-4			7.4
S-7048-163-4			7.4
S-7048-164-4			7.4
S-7048-165-4			7.4
S-7048-229-0			7.4
S-7048-230-0			7.4

Annual PE2:

Units -158-5, -159-5, and -160-4 through -165-4, -229-0, and -230-0:

The facility has proposed to include the two new wine storage tanks in this project to the existing annual wine storage throughput SLC. In addition, the facility has proposed to increase the annual wine storage SLC to 994 lb-VOC/year (equivalent to 5,097,436 gallons/year).

Annual VOC PE2 = EF (lb-VOC/1,000 lb gallons) x Throughput (gallons/year)

PE2			
Permit Unit	EF (lb-VOC/1000 gal)	Annual Throughput SLC (gal/year)	Annual PE2 (lb/year)
S-7048-158-5	0.195	5,097,436	994
S-7048-159-5			
S-7048-160-4			
S-7048-161-4			
S-7048-162-4			
S-7048-163-4			
S-7048-164-4			
S-7048-165-4			
S-7048-229-0			
S-7048-230-0			

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

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

This project only concerns VOC emissions. This facility acknowledges that its VOC emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, SSPE1 calculations are not necessary.

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

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

This project only concerns VOC emissions. This facility acknowledges that its VOC emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, SSPE2 calculations are not necessary.

5. Major Source Determination

Rule 2201 Major Source Determination:

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

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO_2	VOC	SO_2	CO	PM	PM_{10}
Estimated Facility PE before Project Increase*	0	124	0	0	0	0
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

* Facility PE was calculated in project S-1134436 utilizing the District's Calculation of the Potential to Emit from VOC Emissions from Wine Fermentation and Storage Operations guidance.

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

6. Baseline Emissions (BE)

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

Pursuant to District Rule 2201, BE = PE1 for:

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

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

This project only concerns VOC emissions. This facility is a Major Source for VOC emissions; therefore, BE calculations for NOx, SOx, PM_{10}, and CO are not necessary.

Units -158-5, -159-5, and -160-4 through -165-4:

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the

requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

The existing wine storage tanks in this project are located in a temperature controlled building, are equipped with pressure/vacuum valves set within 10% of the maximum allowable working pressure of the tank, and are required by permit condition to not exceed a storage temperature of 75 F within 60 days of completion of fermentation. Therefore, the existing tanks meet the requirements for achieved-in-practice BACT (BACT Guideline 5.4.13) and BE = PE1.

Units S-7048-229-0 and -230-0:

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

7. SB 288 Major Modification

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

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

SB 288 Major Modification Thresholds			
Pollutant	**Project PE2 (lb/year)**	**Threshold (lb/year)**	**SB 288 Major Modification Calculation Required?**
NO_x	0	50,000	No
SO_x	0	80,000	No
PM_{10}	0	30,000	No
VOC	994	50,000	No

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

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

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

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

Federal Major Modification Thresholds for Emission Increases			
Pollutant	**Total Emissions Increases (lb/year)**	**Thresholds (lb/year)**	**Federal Major Modification?**
NO_x*	0	0	No
VOC*	994	0	Yes
PM_{10}	0	30,000	No
$PM_{2.5}$	0	20,000	No
SO_x	0	80,000	No

*If there is any emission increases in NO_x or VOC, this project is a Federal Major Modification and no further analysis is required.

Since there is an increase in VOC emissions, this project constitutes a Federal Major Modification. Federal Offset quantities are calculated below.

Federal Offset Quantities:

The Federal offset quantity is only calculated only for the pollutants for which the project is a Federal Major Modification. The Federal offset quantity is the sum of the annual emission changes for all new and modified emission units in a project calculated as the potential to emit after the modification (PE2) minus the actual emissions (AE) during the baseline period for each emission unit multiplied by the applicable federal offset ratio. There are no special calculations performed for units covered by an SLC.

In this project, the facility has proposed to install two new wine storage tanks, add them to an existing annual SLC, and increase the annual SLC. Since the new storage tanks do not have individual annual emissions limits, their potential to emit is equal to the full value of the SLC (994 lb-VOC/year).

VOC **Federal Offset Ratio** **1.5**

Permit No.	**Actual Emissions (lb/year)**	**Potential Emissions (lb/year)**	**Emissions Change (lb/year)**
S-7048-229-0 and -230-0	0	994	994
		Net Emission Change (lb/year):	994
		Federal Offset Quantity: (NEC * 1.5)	**1,491**

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

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

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM_{10}

I. Project Emissions Increase - New Major Source Determination

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

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO_2	VOC	SO_2	CO	PM	PM_{10}
Total PE from New and Modified Units	0	0.5	0	0	0	0
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

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

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix D.

VIII. Compliance Determination

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

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

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

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

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

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

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

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

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

Each of the tanks being modified in this project contain a permit condition which limits the tank's daily storage throughput of wine. The facility has not proposed to increase the daily storage throughput limits of any of the tanks in this project; therefore, there will not be an increase in the daily potential emissions from each existing tank. However, since the annual SLC for all existing tanks in this project has been increased with the establishment of the new SLC, the existing tanks have the potential to operate on days which they would not have been able to in the past based on their existing SLC.

As shown in Section VII.C.2, all existing tanks in this project have daily emissions greater than 2 lb/day. If any of these existing tanks were operated on a day they would

not have been allowed to operate on due to their previous SLC, their AIPE would be greater than 2 lb/day and BACT would be triggered. Therefore, BACT is triggered for all existing tanks in this project.

d. SB 288/Federal Major Modification

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

2. BACT Guideline

BACT Guideline 5.4.13 applies to the wine storage tanks. See copy of BACT Guideline in Appendix C.

3. Top-Down BACT Analysis

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

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

VOC: Insulated tank, pressure/vacuum valve set within 10% of the maximum allowable working pressure of the tank, "gas tight" tank operation and achieve and maintain a continuous storage temperature not exceeding 75 °F within 60 days of completion of fermentation.

The following conditions will be included on the ATCs as a mechanism to ensure compliance with the requirements of BACT:

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

- The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694]

- The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. 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]

B. Offsets

1. Offset Applicability

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

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	< 20,000	< 54,750	< 29,200	< 200,000	> 20,000
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	Yes

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for VOC and the SSPE2 is greater than the offset thresholds for VOC only. Therefore offset calculations will be required for this project.

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

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

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

otherwise,

BE = HAE

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

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

As previously established in this evaluation, all tanks in this project meet the District's determination of achieved-in-practice BACT (and are thus Clean Emission Units); therefore, the pre-project BE emissions are equal to the pre-project PE emissions ($BE_{SLC} = PE1_{SLC}$).

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

Emissions Increase (lb/year) = $(\Sigma[PE2_{SLC} - BE_{SLC}] + ICCE) \times DOR$

Where,

$\Sigma PE2_{SLC}$ = The post-project potential to emit for this project is equal to the sum of the existing SLC for permit units S-7048-158 through -165 and the proposed increase in the SLC.
= (616 lb-VOC/year + 378 lb-VOC/year)
= 994 lb-VOC/year

ΣBE_{SLC} = The baseline SLC for this project is equal to the existing SLC for permit units S-7048-158 through -165.
= 616 lb-VOC/year

ICCE = 0 lb/year

DOR = 1.5

Therefore,

Emissions Increase (lb/year) = (Σ[$PE2_{SLC}$ – BE_{SLC}] + ICCE) x DOR
= ([994 lb-VOC/year] - [616 lb-VOC/year] + 0) x 1.5
= 567 lb-VOC/year

As indicated above, offsets are required for this project.

The appropriate quarterly emissions to be offset is calculated as follows:

Quarterly offsets required (lb/qtr) = (567 lb-VOC/year) ÷ (4 quarters/year)
= 141.75 lb-VOC/qtr

As shown in the calculation above, the quarterly amount of offsets required for this project, when evenly distributed to each quarter, results in fractional pounds of offsets being required each quarter. Since offsets are required to be withdrawn as whole pounds, the quarterly amounts of offsets need to be adjusted to ensure the quarterly values sum to the total annual amount of offsets required.

To adjust the quarterly amount of offsets required, the fractional amount of offsets required in each quarter will be summed and redistributed to each quarter based on the number of days in each quarter. The redistribution is based on the Quarter 1 having the fewest days and the Quarters 3 and 4 having the most days. The redistribution method is summarized in the following table:

Redistribution of Required Quarterly Offsets (where X is the annual amount of offsets, and X ÷ 4 = Y.z)				
Value of z	**Quarter 1**	**Quarter 2**	**Quarter 3**	**Quarter 4**
.0	Y	Y	Y	Y
.25	Y	Y	Y	Y+1
.5	Y	Y	Y+1	Y+1
.75	Y	Y+1	Y+1	Y+1

Therefore the appropriate quarterly emissions to be offset are as follows:

1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total Annual
141	142	142	142	567

The applicant has stated that the facility plans to use ERC certificates C-1395-1 and N-892-1 to offset the increases in VOC emissions associated with this project. The above certificates have available quarterly VOC credits as follows:

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
ERC #C-1395-1	0	0	379	0
ERC #N-892-1	0	0	189	0
Total	0	0	568	0

Per Rule 2201, Section 4.13.8, actual emission reductions for VOC that occurred from April through November may be used to offset increases of VOC during any period of the year. The actual emissions reductions in the proposed ERCs are all in the 3rd quarter; therefore, they can be used to offset emission increases in any quarter. As seen above, the facility has sufficient credits to fully offset the quarterly VOC emissions increases associated with this project.

Proposed Rule 2201 (offset) Conditions:

- {GC# 4447 - edited} Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16). [District Rule 2201]

- ERC Certificate Numbers C-1395-1 and N-892-1 (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]

C. Public Notification

1. Applicability

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

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

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

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

b. PE > 100 lb/day

The two new wine storage tanks proposed in this project have identical daily PE2s. Additionally, they only have the potential to emit VOCs. The daily PE2s from the two new tanks are compared to the daily PE Public Notice thresholds in the following table:

PE > 100 lb/day Public Notice Thresholds			
Pollutant	**PE2 (lb/day)**	**Public Notice Threshold**	**Public Notice Triggered?**
VOC	7.4	100 lb/day	No

Therefore, public noticing for PE > 100 lb/day purposes is required.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table. VOC is the only pollutant emitted by the units in this project.

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

As detailed above, there were no thresholds surpassed with this project; therefore, public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table. Only the potential emissions from the units in this project will be used to determine if the SSIPE public notice threshold is exceeded.

SSIPE Public Notice Thresholds					
Pollutant	Project PE2 (lb/year)	Project PE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
VOC	994	616	378	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

2. Public Notice Action

As discussed above, public noticing is required for this project since it is a Federal Major Modification for VOC and a Title V significant modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

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

Proposed Rule 2201 (DEL) Conditions:

- Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201]
- Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201]
- The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. 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]
- 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 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]

The current wine storage tanks in this project (units -158 through -165) are limited to a combined annual wine storage throughput SLC. This condition will be revised to address the

proposed increase in the SLC, the addition of the two new wine storage tanks, and the inclusion of the VOC emissions limit along with the throughput in the permit condition. The revised SLC permit condition will be added to every unit in the SLC and is shown below:

- The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and 230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201]

E. Compliance Assurance

1. Source Testing

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

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions will be listed on permits as a mechanism to ensure compliance with the recordkeeping requirements:

- 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]

- Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and 230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly. [District Rule 2201]

- The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rules 2201 and 4694]

- Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rules 1070 and 2201]

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

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

Section 4.14.1 of this Rule requires that an ambient air quality analysis (AAQA) be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. However, since this project only involves VOC emissions and no ambient air quality standard exists for VOC, an AAQA is not required for this project.

G. Compliance Certification

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a Federal Major Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. As discussed in Section VIII above, this facility is a new major source and this project does constitute a Federal Major Modification, therefore this requirement is applicable. ASV Wines Inc.'s compliance certification is included in Appendix E.

H. Alternate Siting Analysis

District Rule 2201, Section 4.15.1 requires an alternative siting analysis for any project which constitutes a New Major Source or a Federal Major Modification. As shown above, this project triggers a Federal Major Modification. Therefore, an alternative siting analysis must be performed.

In addition to winery tanks, the operation of a winery requires a large number support equipment, services and structures such as raw material receiving stations, crushers, piping, filtering and refrigeration units, warehouses, laboratories, bottling and shipping facilities, and administration buildings.

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

Rule 2410 Prevention of Significant Deterioration

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

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. Section 3.29 defines a significant permit modification as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

Section 3.20.5 states that a minor permit modification is a permit modification that is not a Federal Major Modification, as defined in Rule 2201[1]. As discussed above, this project triggers a Federal Major Modification. As a result, the proposed project constitutes a Significant Modification to the Title V Permit pursuant to Section 3.29.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATCs upon submittal of the Title V administrative amendment application. The following conditions will be included on each ATC as a mechanism to ensure compliance with the requirements of Rule 2520:

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201]

- Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

Rule 4001 New Source Performance Standards (NSPS)

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

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

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

[1] District Rule 2520, Section 3.20.5 actually states that a project shall not constitute a Title I modification, as defined in Rule 2201. In a previous version of Rule 2201, the term Title I modification was replaced with Federal Major Modification. However, at that time, the terminology in Rule 2520 was not updated to reflect the new Rule 2201 terms. Therefore, even though Rule 2520 references that a project triggering a Title I modification does not qualify as a Title V minor modification, it will be replaced with the term Federal Major Modification for the purposes of this project.

CFR Part 61 or 40 CFR Part 63 apply to wine storage tanks. Therefore, no further discussion is required.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Visible emissions are not expected as a result of these wine storage operations. Therefore, compliance with this rule is expected. The following permit condition will be added to the permits as a mechanism to further ensure compliance with the requirements of this rule.

- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected. The following permit condition will be added to the permits as a mechanism to further ensure compliance with the requirements of this rule.

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

California Health & Safety Code 41700 (Health Risk Assessment)

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

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

Rule 4623 Storage of Organic Liquids

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

However, Section 4.1.4 provides an exemption for tanks used to store fermentation products, byproducts or spirits. The tanks in this project are used solely for the storage of wine.

Therefore, the requirements of this rule are not applicable to any of the winery tanks within this project.

Rule 4694 Wine Fermentation and Storage Tanks

The purpose of this rule is to reduce emissions of volatile organic compounds (VOC) from the fermentation and bulk storage of wine, or achieve equivalent reductions from alternative emission sources. This rule is applicable to all facilities with fermentation emissions in excess of 10 tons-VOC/year. The storage tank provisions of this rule apply to all tanks with capacity in excess of 5,000 gallons.

Section 5.1 requires the winery operator achieve Required Annual Emissions Reductions (RAER) equal to at least 35% of the winery's Baseline Fermentation Emissions (BFE). Since the proposed tanks will be used for storage only, this section is not applicable; therefore, no further discussion is required.

Section 5.2 places specific restrictions on wine storage tanks with 5,000 gallons or more in capacity when such tanks are not constructed of wood or concrete. Section 5.2.1 requires these tanks to be equipped and operated with a pressure-vacuum relief valve meeting all of the following requirements:

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

The following conditions will be placed on the permits as a mechanism to ensure compliance with the requirements of Section 5.2.1:

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

- The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694]

Section 5.2.2 requires that the temperature of the stored wine be maintained at or below 75° F. The following condition will be placed on the permits for stainless steel tanks ≥ 5,000 gallons in capacity and used for storage to ensure compliance with the requirements of Section 5.2.2:

- 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]

Sections 6.1 and 6.2 require facilities with fermentation operations to submit a Three-Year Compliance Plan and a Three-Year Compliance Plan Verification every three years, respectively. The proposed tanks in this project are for wine storage only, and since these sections are not applicable to wine storage operations, no further discussion is required.

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

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

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

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

- The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rules 2201 and 4694]

Section 6.4.3 requires that all monitoring be performed for any CERs as identified in the facility's Three-Year Compliance Plan and that the records of all monitoring be maintained. Since this requirement is for operators mitigation fermentation emission and the proposed tanks are only for wine storage operations, this section is not applicable to wine tanks in this project. Therefore, no further discussion is required.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

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

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

Greenhouse Gas (GHG) Significance Determination

District is a Lead Agency and Project not Covered Under Cap-and-Trade

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The only pollutant emitted by the permit units in this project is ethanol, which is not a greenhouse gas. Therefore, this project will not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

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

Indemnification Agreement/Letter of Credit Determination

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

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful 30-day NSR Public Noticing period and 45-day EPA review period, issue ATC permits S-7048-158-5, -159-5, -160-4 through -165-4, -229-0, and -230-0 subject to the permit conditions on the attached draft ATCs in Appendix B.

X. Billing Information

Annual Permit Fees			
Permit Number	**Fee Schedule**	**Fee Description**	**Annual Fee**
S-7048-158	3020-05-B	9,385 Gallons	$108
S-7048-159	3020-05-B	9,385 Gallons	$108
S-7048-160	3020-05-B	9,385 Gallons	$108
S-7048-161	3020-05-B	9,385 Gallons	$108
S-7048-162	3020-05-B	9,385 Gallons	$108
S-7048-163	3020-05-B	9,385 Gallons	$108
S-7048-164	3020-05-B	9,385 Gallons	$108
S-7048-165	3020-05-B	9,385 Gallons	$108
S-7048-229	3020-05-B	5,000 Gallons	$108
S-7048-230	3020-05-B	5,000 Gallons	$108

Appendixes

A: Current PTOs
B: Draft ATCs
C: BACT Guideline and Top-Down BACT Analysis
D: Quarterly Net Emissions Change
E: Statewide Compliance Certification

APPENDIX A

Current PTOs

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-158-4 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2001 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-159-4 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2002 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-160-3 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2003 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-161-3 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2004 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-162-3 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2005 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-163-3 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2006 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-164-3 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2007 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-7048-165-3 **EXPIRATION DATE:** 03/31/2023

EQUIPMENT DESCRIPTION:
9,385 GALLON GAUGE STEEL WINE STORAGE TANK #2008 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
4. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Annual throughput of wine stored in tanks listed in permits S-7048-158 through -165, calculated on a twelve month rolling basis, shall not exceed 4,200,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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
8. Records of the 12-month rolling wine storage throughput shall be maintained and updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If the throughput calculated for any rolling 12-month period exceeds the annual throughput 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 throughput limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput is below the annual throughput limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
12. 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 2201 and 4694] Federally Enforceable Through Title V Permit

APPENDIX B

Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-158-5 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2001 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
S-7048-158-5 : Jul 27 2018 10:41AM – FUKUDAD : Joint Inspection NOT Required

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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 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
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-159-5 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2002 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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 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
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-160-4 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2003 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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 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
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-161-4 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2004 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
S-7048-161-4 : Jul 27 2018 10:41AM – FUKUDAD : Joint Inspection NOT Required

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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 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
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-162-4 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2005 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

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6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit

12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit

13. 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

14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit

15. 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 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

16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit

17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit

18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-163-4

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2006 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit

12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit

13. 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

14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit

15. 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 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

16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit

17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit

18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-164-4

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2007 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-7048-164-4 : Jul 27 2016 10:41AM – FUKUDAD : Joint Inspection NOT Required

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit

12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit

13. 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

14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit

15. 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 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

16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit

17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit

18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-165-4

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
MODIFICATION OF 9,385 GALLON NOMINAL (9,390 GALLON GAUGE) STEEL WINE STORAGE TANK #2008 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING: INCREASE THE ANNUAL WINE STORAGE THROUGHPUT SPECIFIC LIMITING CONDITION (SLC) AND ADD UNITS -229 AND -230 TO THE SLC

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-7048-165-4 : Jul 27 2018 10:41AM – FUKUDAD : Joint Inspection NOT Required

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

7. 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. 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. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit

10. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit

12. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit

13. 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

14. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit

15. 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 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

16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit

17. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit

18. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-7048-229-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
5,000 GALLON NOMINAL STEEL WINE STORAGE TANK #2009 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

S-7048-229-0 Jul 27 2018 10:42AM – FUKUDAD : Joint Inspection NOT Required

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. The nominal tank dimensions are 7.3 feet in diameter and 17 feet in height with a proposed volume of 5,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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
9. 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
10. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
11. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit
16. 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 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
17. 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
18. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
19. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-7048-230-0 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ASV WINES INC
MAILING ADDRESS: 1998 ROAD 152
DELANO, CA 93215-9437

LOCATION: 31502 PETERSON RD
MCFARLAND, CA 93250

EQUIPMENT DESCRIPTION:
5,000 GALLON NOMINAL STEEL WINE STORAGE TANK #2010 WITH PRESSURE/VACUUM VALVE, INSTALLED IN AN ENCLOSED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 141 lb, 2nd quarter - 142 lb, 3rd quarter - 142 lb, and 4th quarter - 142 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 C-1395-1 and N-892-1 (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. {98} 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 (661) 392-5500 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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
S-7048-230-0 : Jul 27 2018 10:42AM -- FUKUDAD : Joint Inspection NOT Required

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. The nominal tank dimensions are 7.3 feet in diameter and 17 feet in height with a proposed volume of 5,000 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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
9. 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
10. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
11. Ethanol content of wine in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Daily tank throughput shall not exceed 20,000 gallons in any one day period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The maximum combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230, calculated on a rolling 12-month basis, shall not exceed 994 lb-VOC/year (equivalent to 5,097,436 gallons of wine throughput). [District Rule 2201] Federally Enforceable Through Title V Permit
14. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. Records of the combined annual wine storage emissions from tanks S-7048-158 through -165, -229, and -230 (calculated on a 12-month rolling basis) shall be maintained and updated monthly [District Rule 2201] Federally Enforceable Through Title V Permit
16. 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 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
17. 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
18. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
19. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

APPENDIX C

BACT Guideline and Top-Down BACT Analysis

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 5.4.13*

Last Update: 09/26/2011

Wine Storage Tank - Non-Wood Material**

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

**This guideline is applicable to a wine storage tank that is not constructed out of wooden materials.
***Tanks made of heat-conducting materials such as stainless steel may be insulated or stored indoors (in a completely enclosed building, except for vents, doors and other essential openings) to limit exposure ot diurnal temperature variations. Tanks made entirely of non-conducting materials such as concrete (except for fittings) are considered self-insulating.

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

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

Top Down BACT Analysis for VOCs from Wine Storage Operations

Step 1 - Identify All Possible Control Technologies

SJVUAPCD BACT Clearinghouse guideline 5.4.13 identifies achieved in practice BACT for wine storage tanks as follows:

1) Insulation or Equivalent**, Pressure Vacuum Relief Valve (PVRV) set within 10% of the maximum allowable working pressure of the tank; "gas-tight" tank operation; and continuous storage temperature not exceeding 75 degrees F, achieved within 60 days of completion of fermentation.

SJVUAPCD BACT Clearinghouse guideline 5.4.13 identifies technologically feasible BACT for wine storage tanks as follows:

1) Capture of VOCs and thermal or catalytic oxidation or equivalent (98% control)
2) Capture of VOCs and carbon adsorption or equivalent (95% control)
3) Capture of VOCs and absorption or equivalent (90% control)
4) Capture of VOCs and condensation or equivalent (70% control)

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

SJVUAPCD BACT Clearinghouse guideline 5.4.13 does not identify any alternate basic equipment control alternatives.

Step 2 - Eliminate Technologically Infeasible Options

None of the above listed technologies are technologically infeasible.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

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

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

Step 4 - Cost Effectiveness Analysis

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

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

Uncontrolled Storage Emissions

ASV Wines is proposing to install two new wine storage tanks and increase an existing combined annual emissions limit shared between units S-7048-158 through -165, -229, and -230 in this project. Therefore, for the purposes of this cost effectiveness analysis, uncontrolled storage VOC emissions will be set equal to the total VOC emissions allowed from all of the storage tanks in the combined annual emissions limit.

Uncontrolled Storage PE = 994 lb-VOC/year

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

A common feature of all thermal oxidation/carbon adsorption/absorption or condensation options is that they require installation of a collection system for delivering the VOCs from the tanks to the common control device(s) and a Clean-In-Place (CIP) system. For this project, the cost effectiveness of the technologically feasible control devices will be determined solely using the capital cost of a CIP system.

Basis of Cost Information:

- Sales Tax: This facility is located in McFarland, CA, which has a current sales tax rate of 7.25%. However, pollution control equipment qualifies for a partial tax exemption in California. According to the following link, the tax exemption rate is 3.9375%, https://www.cdtfa.ca.gov/industry/manufacturing-exemptions.htm. Therefore, the sales tax rate used in this analysis will be set equal to 3.31% (7.25% - 3.9375%).
- The costs for the CIP system is based on information from the 2005 Eichleay Study. The 2005 Eichleay study was used in development of District Rule 4694 Wine Fermentation and Storage Tanks and includes substantial information on the costs and details of the potential application of VOC controls to wineries and addresses many of the technical issues of the general site specific factors for wineries.

Capital Cost CIP System

A ducting system on a tank farm must have this system to maintain sanitation and quality of the product. The cost of operation of the CIP system has not been estimated. Operation of a CIP system, using typical cleaning agents, will raise disposal and wastewater treatment costs. Most likely, these costs will be significant.

Capital Cost of Clean-In-Place (CIP) System of Ductwork for Wine Fermentation Tanks	
Cost Description	Cost ($)
Current cost of CIP system (one low flow collection system)	$100,000
The following cost data is taken from EPA Control Cost Manual, Sixth Edition (EPA/452/B-02-001).	
Direct Costs	
Base Equipment Costs (CIP System) See Above	$100,000
Instrumentation - 10% of base equipment	$10,000
Sales Tax – 3.31% of base equipment	$3,310
Freight - 5% of base equipment	$5,000
Purchased equipment cost (PEC)	**$118,310**
Foundations & supports - 8% of PEC	$9,465
Handling & erection - 14% of PEC	$16,563
Electrical - 4% of PEC	$4,732
Piping – (considered in ducting cost if needed)	-
Painting - 1% of PEC	$1,183
Insulation - 1% of PEC	$1,183
Direct Installation Costs (DIC)	**$33,126**
Total Direct Costs (DC) (PEC + DIC)	**$151,436**
Indirect Costs	
Engineering - 10% of PEC	$11,831
Construction and field expenses - 5% of PEC	$5,916
Contractor fees - 10% of PEC	$11,831
Start-up - 2% of PEC	$2,366
Performance test - 1% of PEC	$1,183
Total Indirect Costs (IC)	**$33,127**
Subtotal Capital Investment (SCI) (DC + IC)	**$184,563**
Contingencies - 15% of SCI	$27,684
Total Capital Investment (TCI) (SCI + Contingency)	**$212,247**

Annualized Capital Cost

Total capital costs = $212,247

Annualized Capital Investment = Initial Capital Investment x Amortization Factor

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

Therefore,

Total Collection System Annualized Capital Investment = $212,247 x 0.163

Total Collection System Annualized Capital Investment = $34,596

Option 1 - Collection of VOCs and Control by Thermal or Catalytic Oxidation (98% collection & control):

Total Annual Cost

Total Annual Cost = CIP System
= $34,596

Emission Reductions

Annual Emission Reduction = Uncontrolled Emissions x 0.98
= 994 lb-VOC/year x 0.98
= 974 lb-VOC/year
= 0.49 tons-VOC/year

Cost Effectiveness

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

Cost Effectiveness = $34,596/year ÷ 0.49 tons-VOC/year
= $70,604/ton-VOC

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

Option 2 - Collection of VOCs and control by carbon adsorption (95% collection and control):

Total Annual Cost

Total Annual Cost = CIP System
= $34,596

Emission Reductions

Annual Emission Reduction = Uncontrolled Emissions x 0.95
= 994 lb-VOC/year x 0.95
= 944 lb-VOC/year
= 0.47 tons-VOC/year

Cost Effectiveness

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

Cost Effectiveness = $34,596/year ÷ 0.47 tons-VOC/year
= $73,609/ton-VOC

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

Option 3 - Collection of VOCs and Control by Absorption/Scrubber (90% collection & control):

Total Annual Cost

Total Annual Cost = CIP System
= $34,596

Emission Reductions

Annual Emission Reduction = Uncontrolled Emissions x 0.90
= 994 lb-VOC/year x 0.90
= 895 lb-VOC/year
= 0.45 tons-VOC/year

Cost Effectiveness

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

Cost Effectiveness = $34,596/year ÷ 0.45 tons-VOC/year
= $76,880/ton-VOC

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

Option 4 - Capture of VOCs and Condensation (70% collection & control):

Total Annual Cost

Total Annual Cost = CIP System
= $34,596

Emission Reductions

Annual Emission Reduction = Uncontrolled Emissions x 0.70
= 994 lb-VOC/year x 0.70
= 696 lb-VOC/year
= 0.35 tons-VOC/year

Cost Effectiveness

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

Cost Effectiveness = $34,596/year ÷ 0.35 tons-VOC/year
= $98,946/ton-VOC

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

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

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

Step 5 – Select BACT

All identified technologically feasible options with control efficiencies higher than the option proposed by the facility have been shown to not be cost effective. All wine storage tanks in this project will be equipped and/or operated in a manner that complies with Option 5, insulated tank, pressure/vacuum valve set within 10% of the maximum allowable working pressure of the tank, "gas tight" tank operation and achieve and maintain a continuous storage temperature not exceeding 75 °F within 60 days of completion of fermentation. Therefore, the BACT requirements for VOC emissions will be satisfied for the purposes of this project.

APPENDIX D

Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

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

$QNEC_{SLC} = PE2_{SLC} - PE1_{SLC}$, where:

$QNEC_{SLC}$ = Quarterly Net Emissions Change for units covered by the SLC.
$PE2_{SLC}$ = PE2 for all units covered by the SLC.
$PE1_{SLC}$ = PE1 for all units covered by the SLC.

Quarterly NEC_{SLC} [$QNEC_{SLC}$]			
Pollutant	**$PE2_{SLC}$ (lb/qtr)**	**$PE1_{SLC}$ (lb/qtr)**	**$QNEC_{SLC}$ (lb/qtr)**
VOC	154	248.8	94.5

APPENDIX E

Statewide Compliance Certification

ASV WINES

December 6, 2017

Project: Add two storage stainless steel wine tanks to Wine Storage at Bottling

Compliance Certification Statement
For Federal Major Permit Modifications
Compliance with District Rule 2201, Section 4.15.2

"I certify under penalty of law that all major stationary sources (Title V Facility) operated under my control in California are compliant with all applicable air emissions limitations and standards. The facility included in this certification statement is:

ASV Wines Inc.
31502 Peterson Road
McFarland, California
93250"

William J. Nakata
ASV Wines Technical Advisor

December 6, 2017
Date