



MAY 16 2019

Mr. Erik Ettner
O'Neill Beverages Co., LLC
8418 S Lac Jac Ave
Parlier, CA 93648

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Facility Number: C-629
Project Number: C-1183015

Dear Mr. Ettner:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The proposed modification consists of the installation of one (1) new 32,715 gallon stainless steel wine storage tank.

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

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

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

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San Joaquin Valley Air Pollution Control District

Authority to Construct Application Review

Wine Storage Tank

<p>Facility Name: O'Neill Beverages Co., LLC</p> <p>Mailing Address: 8418 S Lac Jac Ave Parlier, CA 93648</p> <p>Contact Person: Erik Ettner</p> <p>Telephone: (559) 638-3544</p> <p>E-Mail: eeetner@oneillwines.com</p> <p>Application #(s): C-629-759-0</p> <p>Project #: C-1183015</p> <p>Deemed Complete: November 30, 2018</p>	<p>Date: May 16, 2019</p> <p>Engineer: Jonah Aiyabei</p> <p>Lead Engineer: Jerry Sandhu</p>
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I. Proposal

O'Neill Beverages Co., LLC (O'Neill Beverages) has applied for an Authority to Construct (ATC) permit for the installation of one (1) new 32,715 gallon stainless steel wine storage tank. The new tank will be insulated and equipped with a pressure/vacuum relief valve. Additionally, O'Neill Beverages has proposed to include the new tank in the existing facility-wide Specific Limiting Condition (SLC), which limits the annual VOC storage emissions from all wine and distilled spirits storage tanks at the facility, except for the facility's storage tanks currently designated as permit units C-629-11 through -281.

O'Neill Beverages received their Title V Permit on July 31, 2010. This modification is classified as a Title V significant modification pursuant to Rule 2520, and will be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. O'Neill Beverages must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4102	Nuisance (12/17/92)
Rule 4623	Storage of Organic Liquids (5/19/05)
Rule 4694	Wine Fermentation and Storage Tanks (12/15/05)
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 8418 S Lac Jac Ave in Parlier. The District has verified that the equipment is located within 1,000 feet of the outer boundary of a K-12 school. However, as discussed within this document, the proposed wine storage tank does not result in an increase in Hazardous Air Pollutant (HAP) emissions. Therefore, in accordance with the California Health and Safety Code, Section 42301.6, a school notice is not required.

IV. Process Description

O'Neill Beverages 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 first 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 (red or white) 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 and releasing heat. Although fermentation temperatures vary widely depending upon the specific quality and style of the wine, temperature is typically controlled to maintain a temperature of 45-70° F for white wine fermentation and 70-85° 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 for 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. VOC's are emitted during the fermentation process along with the CO₂. The VOC's consist primarily of ethanol along with minor fermentation byproducts.

Following the completion of fermentation, white wine is transferred directly to storage tanks. Red wine is first directed to the presses for separation of solids and then routed to the storage tanks. All tanks in the winery typically operate as two separate emissions units; 1) a fermentation operation during which the tank is vented directly to the atmosphere to release the evolved CO₂ byproduct from the fermentation reaction; and 2) a storage operation where the tank is closed to minimize contact with air and the contents is often refrigerated. Post-fermentation operations are conducted in the tanks including cold stabilization, racking, filtration, etc. which result in a number of inter-tank transfers of the wine during this period leading up to the bottling or bulk shipment of the finished

product. Storage operations are conducted year-round. VOC emissions occur primarily as a result of the inter-tank wine transfers which occur during the post fermentation operations.

Additionally, O'Neill Beverages produces distilled alcoholic beverages (spirits) which are stored and processed in tanks similar to wine storage tanks.

The proposed new tank will be used solely for wine storage.

V. Equipment Listing

Equipment Description:

C-629-759-0: 32,715 GALLON NOMINAL STAINLESS STEEL RED AND WHITE WINE STORAGE TANK (TANK #R6013) WITH A PRESSURE/VACUUM VALVE AND INSULATION

The specific tank dimensions and nominal volumes will be included as a permit condition on the ATC. The dimensions (height x diameter) of the proposed tank are 30' x 13'7".

Proposed Permit Condition:

- The nominal tank dimensions are 13 feet 7 inches in diameter and 30 feet in height with a proposed volume of 32,715 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

- Only VOC will be emitted by the proposed tank.
- The proposed tank will only be used for red and white wine storage.
- The maximum ethanol content of stored wine is 23.9% (per applicant).
- Typically, for enclosed tanks with refrigeration and/or insulation (or equivalent) and P/V valves, breathing losses from storage of wine are assumed to be negligible.
- The maximum daily storage throughput is 99,000 gal (per applicant).
- The annual storage throughput will be 20 tank capacity turnovers per year (per applicant).

B. Emission Factors

Storage Emission Factors:

Per District practice for establishing VOC emission factors for wine fermenting and storage tanks located in the Central Region, the emission factors are as follows:

Wine Type	Vol% Ethanol	EF (lb-VOC/1,000 gallon of wine)	
		Daily	Annual
White/Red	23.9	0.412	0.227

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Since the tank is a new emissions unit, PE1 = 0 for all pollutants.

2. Post-Project Potential to Emit (PE2)

The daily PE2 is calculated as follows:

$$\begin{aligned} \text{Daily PE2} &= \text{EF (lb-VOC/1,000 lb gallons)} \times \text{Throughput (gallons/day)} \\ &= (0.412 \text{ lb/1,000 gal}) \times 99,000 \text{ gal} \\ &= 40.8 \text{ lb/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= \text{EF (lb-VOC/1,000 lb gallons)} \times \text{Throughput (gallons/yr)} \\ &= (0.227 \text{ lb/1,000 gal}) \times 32,715 \text{ gal} \times 20 \text{ turnovers/yr} \\ &= 149 \text{ lb/yr} \end{aligned}$$

The annual emissions from the new tank will be included in the existing storage emissions SLC (30,496 lb), which is shared with all the storage tanks (except units C-629-11 through C-629-281).

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

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

VOC is the only pollutant expected to be emitted from the proposed unit. Since this facility acknowledges that its VOC emissions are already above the offset and major source thresholds, 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 ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

VOC is the only pollutant expected to be emitted from the proposed unit. Since this facility acknowledges that its VOC emissions are already above the offset and major source thresholds, SSPE2 calculations are not necessary.

5. Major Source Determination

Rule 2201 Major Source Determination

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

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

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

Rule 2410 Major Source Determination

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

The facility-wide SLC for wine fermentation operations is 410,502 lb-VOC/year, the VOC emissions from each of the two brandy storage warehouses is 51,435 lb-VOC/year, and the existing storage emission SLC is 30,496 lb-VOC/year. As shown in the tables on the next page, the VOC emissions from these operations exceed the PSD major source threshold.

VOC Emissions	
Operation	Annual Emissions
Wine Fermentation SLC	410,502
Brandy Storage Warehouses	102,870
Wine Storage SLC	30,496
Total (lb/year)	544,057
Total (tons/year)	272

PSD Major Source Determination (tons/year)	
	VOC
Estimated Facility PE Before Project Increase	> 250
PSD Major Source Thresholds	250
PSD Major Source ? (Y/N)	Y

As shown above, the facility is an existing major source for PSD for at least one pollutant. Therefore the facility is an existing major source for PSD.

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.

The facility has proposed that the VOC emissions from the proposed wine storage tank be included in the existing annual wine/distilled spirits storage VOC emissions SLC. Therefore, the BE from the tanks in the existing SLC will be used in this project.

Tanks in Existing SLC

In project C-1180097, the District established that all tanks in the existing SLC were clean emissions units based on their compliance with the achieved-in-practice (AIP) BACT requirements in BACT Guidelines 5.4.13 and 5.4.15. Although BACT Guideline 5.4.13

has been updated since project C-1180097 was finalized, no changes to any of the requirements were made. BACT Guideline 5.4.15 has not been updated since project C-1180097 was finalized. All the tanks in the existing SLC are therefore still in compliance with the AIP BACT requirements, and remain clean emissions units.

New Storage Tank

Since the proposed storage tank is a new emissions unit, 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 threshold for VOC in the following table in order to determine if the SB 288 major modification calculation is required:

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
VOC	149	50,000	No

Since the SB 288 major modification threshold for VOC is not surpassed, 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 the project. The project's combined total emission increases are compared to the federal major modification thresholds in the following table:

Federal Major Modification Threshold for VOC Emission Increases			
Pollutant	Total Emission Increases (lb/year)	Threshold (lb/year)	Federal Major Modification?
VOC*	149	0	Yes

*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 offsets quantity is calculated below.

Federal Offsets Quantity

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

The federal offset ratio for VOC and NO_x is 1.5 to 1 (due to extreme ozone non-attainment). The federal offset quantity is equal to the sum of the emission changes (PE2 – AE) times the federal offset ratio.

Permit No.	Actual Emissions (lb/year)	Potential Emissions (lb/year)	Emissions Change (lb/year)
C-629-759-0	0	149	149
Net Emission Change (lb/year):			149
Federal Offset Quantity (NEC x 1.5):			224

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

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The only pollutant emitted by the proposed unit is VOC, for which the District is classified as nonattainment. Since the only pollutant emitted by this operation is a nonattainment pollutant, and the facility is already a PSD major source, 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.

The emissions from the new tank will be included in the existing SLC. There is therefore no change to the overall facility emissions, and the QNEC is equal to zero.

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 shown in Section VII.C.2 of this evaluation, the applicant is proposing to install a new wine storage tank with PE greater than 2.0 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 under this category.

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

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

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute a SB 288 Major Modification; however, it 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. [Wine Storage Tanks] (Appendix B)

3. Top-Down BACT Analysis

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

Pursuant to the attached Top-Down BACT Analysis (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 ATC 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	0	0	0	0	>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. Therefore offset calculations will be required for this project.

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

Offsets Required (lb/year) = $(\Sigma[PE2 - BE] + ICCE) \times DOR$, for all new or modified emissions units in the project,

Where,

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

BE = Baseline Emissions, (lb/year)

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

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

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

Otherwise,

BE = HAE

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

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

As previously established in this evaluation, all tanks in the existing SLC are Clean Emission Units; therefore, the pre-project BE emissions are equal to the pre-project PE emissions ($BE_{SLC} = PE_{1SLC}$).

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

$$\text{Emissions Increase (lb/year)} = \Sigma[PE_{2SLC} - BE_{SLC}]$$

Where,

$$\begin{aligned}\Sigma PE_{2SLC} &= \text{The post-project SLC emissions limit} \\ &= 30,496 \text{ lb-VOC/year}\end{aligned}$$

$$\begin{aligned}\Sigma BE_{SLC} &= \text{The pre-project SLC emissions limit} \\ &= 30,496 \text{ lb-VOC/year}\end{aligned}$$

Therefore,

$$\begin{aligned}\text{Emissions Increase (lb/year)} &= \Sigma[PE_{2SLC} - BE_{SLC}] \\ &= [30,496 \text{ lb-VOC/year}] - [30,496 \text{ lb-VOC/year}] \\ &= 0 \text{ lb-VOC/year}\end{aligned}$$

As shown in the calculations above, no offsets are required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

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

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

New major sources are new facilities, which are also major sources. Since this is not a new facility, public noticing is not required for this project for new major source purposes.

As demonstrated in Section VII.C.8, this project is a federal major modification. Therefore, public noticing for federal major modification purposes is required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 of this evaluation, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant. Public noticing for PE > 100 lb/day purposes is therefore not 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 shown 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.

In this project, the facility has proposed to install a new tank and include the new tank's emissions in an existing SLC. The facility has also indicated that the value of the SLC will not change with the inclusion of the new tank. Since the proposed unit will be included in an existing SLC, with no changes to the emissions limit of the existing SLC, the SSIPE will be 0 lb/year and will not exceed the 20,000 lb/year SSIPE public notice threshold. Therefore, public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Rule 2520 discussion below, this project constitutes a Title V significant modification. Public noticing for Title V significant modification is therefore required.

2. Public Notice Action

As discussed above, public noticing is required for this project for triggering a federal major modification and for triggering a Title V significant permit modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and to the Environmental Protection Agency (EPA) and a public notice will be published in the local newspaper of general circulation prior to the issuance of the ATC permit for the proposed tank.

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.

For all storage tank emissions units affected by this project, the DEL is stated in the form of a daily limit on tank throughput and a maximum ethanol content for stored wine in the tank. In addition, annual emissions from the tank will be limited based on an existing SLC.

Proposed Rule 2201 (DEL) Conditions

- No wine fermentation shall occur in this tank. [District Rules 2201 and 4694]
- The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201]
- The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %, $a = -0.45139$, $b = 1.0542$ and $c = 0$. [District Rule 2201]
- Except for permit units C-629-11 through -281, the combined annual VOC emissions from all storage operations at this facility, calculated on a twelve-month rolling basis, shall not exceed 30,496 pounds per year. [District Rule 2201]
- Combined annual VOC emissions from storage operations at this facility, excluding permit unit C-629-11 through -281, shall be determined as the sum of the emissions for each individual wine/distilled spirits movement based on the volume transferred in each wine/distilled spirits movement and the batch-specific wine/distilled spirits storage emission factor calculated using the equation specified within this permit. [District Rule 2201]

- The maximum storage throughput in this tank shall not exceed 99,000 gallons per day. [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 the ATC:

- Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201]
- If the emissions calculated for any rolling twelve-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling twelve-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201]
- Records of the combined annual storage emissions from wine and distilled spirits storage operations at this facility, excluding permit units C-629-11 through -281, calculated on a twelve-month rolling basis, including calculation methods and parameters used, shall be maintained. [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]
- 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]

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 involves only VOC and no ambient air quality standard exists for VOC, an AAQA is not applicable.

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 project does constitute a federal major modification, therefore this requirement is applicable. O'Neill Beverages' compliance certification is included in Appendix D.

H. Alternate Siting Analysis

Alternative siting analysis is required for any project which constitutes a new major source or a federal major modification. As discussed in this evaluation, this project constitutes a federal major modification.

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 project involves the installation of a new wine storage tank to be used at the same location, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures on a much greater scale, and would therefore result in a much greater impact.

Rule 2410 Prevention of Significant Deterioration

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

Rule 2520 Federally Mandated Operating Permits

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

Section 3.20.5 states that a minor permit modification is a permit modification that does not meet the definition of modification as given in Section 111 or Section 112 of the Federal Clean Air Act. Since this project is a Title I modification (i.e. federal major modification), the proposed project

is considered to be a modification under the Federal Clean Air Act. 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 ATC upon submittal of the Title V administrative amendment application. The following permit conditions will be added to the ATC as a mechanism to ensure compliance with this rule:

- {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]
- {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]

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 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). Based on past inspections of similar emissions units, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. The following condition will be added to the ATCs as a mechanism to ensure compliance with this rule:

- {15} 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 condition will be placed on the ATC as a mechanism to ensure compliance with this rule:

- {98} 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.

Ethanol, the primary chemical constituent of wine, is not a HAP as defined by Section 44321 of the California Health and Safety Code. Since the proposed tank will be used exclusively for wine storage, there will be no increases in HAP emissions associated with this project. A health risk assessment is therefore not necessary and no further risk analysis is required.

District 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 proposed tank will be used to store wine; therefore, the requirements of this rule are not applicable to this project.

District 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 that 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 tank will be used for storage only, this section is not applicable. The following condition will be placed on the permit as a mechanism to ensure continued compliance:

- No wine fermentation shall occur in this tank. [District Rules 2201 and 4694]

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

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

The following conditions will be placed on the permit 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 permit as a mechanism 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]

Every three years, Section 6.1 and 6.2 require facilities with fermentation operations to submit a Three-Year Compliance Plan and a Three-Year Compliance Plan Verification respectively. The proposed tank is 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 condition will be placed on the permit as a mechanism 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. As previously stated, the proposed tank will not be used for fermentation; therefore, this section does not apply.

Section 6.4.2 requires that weekly records be kept of wine volume and temperature in each storage tank. The following condition will be placed on the permit as a mechanism 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 fermentation operations and the proposed tank is only for wine storage operations, this section is not applicable. Therefore, no further discussion is required.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that the equipment is located within 1,000 feet of the outer boundary of a K-12 school. However, as discussed within this document, the proposed wine storage tank will not result in an increase in Hazardous Air Pollutant (HAP) emissions. Therefore, in accordance with the California Health and Safety Code, Section 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

It is determined that another agency has prepared an environmental review document for the project. The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CEQA Guidelines §15381). As a Responsible Agency, the District is limited to mitigating or avoiding impacts for which it has statutory authority. The District does not have statutory authority for regulating greenhouse gas emissions. The District has determined that the applicant is responsible for implementing greenhouse gas mitigation measures, if any, imposed by the Lead Agency.

District CEQA Findings

The County of Fresno (County) is the public agency having principal responsibility for approving the O'Neill Beverages Company, LLC winery expansion project under Initial Study Application No. 6889 and Classified Conditional Use Permit Application No. 3479, which covers this project. As such, the County served as the Lead Agency (CCR §15367). In approving the O'Neill Beverages Company, LLC winery expansion project, the Lead Agency prepared and adopted a Mitigated Negative Declaration. The Lead agency filed a Notice of Determination, stating that the environmental document was adopted pursuant to the provisions of CEQA and concluding that the O'Neill Beverages Company, LLC winery expansion project would not have a significant effect on the environment.

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

The District has considered the Lead Agency's environmental document. Furthermore, the District has conducted an engineering evaluation of the project, this document, which demonstrates that Stationary Source emissions from the project would be below the District's thresholds of significance for criteria pollutants. Thus, the District finds that through a combination of project design elements, compliance with applicable District rules and regulations, and compliance with District air permit conditions, project specific stationary source emissions will have a less than significant impact on air quality. The District does not have authority over any of the other project impacts and has, therefore, determined that no additional findings are required (CEQA Guidelines §15096(h)).

Indemnification Agreement/Letter of Credit Determination

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

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an Indemnification Agreement and/or 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 NSR and COC public noticing period, issue ATC permit C-629-759-0 subject to the permit conditions on the draft ATC attached in Appendix A.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-629-759-0	3020-05-C	32,715 gallon storage tank	\$157

Appendices

- A: Draft ATC
- B: BACT Guideline 5.4.13
- C: Top-Down Analysis
- D: Statewide Compliance Certification

APPENDIX A

Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-759-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC
MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

32,715 GALLON NOMINAL STAINLESS STEEL RED AND WHITE WINE STORAGE TANK (TANK # R6013) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The nominal tank dimensions are 13 feet 7 inches in diameter and 30 feet in height with a proposed volume of 32,715 gallons. The permittee shall submit to the District the gauge volume of the tank within 30 days of the actual tank capacity measurement. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
6. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Marjolle, Director of Permit Services

C-629-759-0 : May 15 2019 4:16PM - AIYABEU : Joint Inspection NOT Required

7. 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
8. No wine fermentation shall occur in this tank. [District Rules 2201 and 4694]
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The maximum storage throughput in this tank shall not exceed 99,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum storage throughput in this tank shall not exceed 20 tank turnovers in any twelve month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Except for permit units C-629-11 through -281, the combined annual VOC emissions from all storage operations at this facility, calculated on a twelve month rolling basis, shall not exceed 30,496 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = a * P^2 + b * P + c$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %, $a = -0.45139$, $b = 1.0542$ and $c = 0$. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from storage operations at this facility, excluding permit units C-629-11 through -281, shall be determined as the sum of the emissions for each individual wine/distilled spirits movement based on the volume transferred in each wine/distilled spirits movement and the batch-specific wine/distilled spirits storage emission factor calculated using the equation specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
16. 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
17. Daily and annual 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/spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
19. If the emissions calculated for any rolling twelve-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling twelve-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
20. Records of the combined annual storage emissions from wine and distilled spirits storage operations at this facility, excluding permit units C-629-11 through -281, calculated on a twelve month rolling basis, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
21. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

DRAFT

APPENDIX B

BACT Guideline 5.4.13

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 5.4.13*

Last Update: 09/07/2018

Wine Storage Tank - Non-Wood Material**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	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	<ol style="list-style-type: none"> 1. Capture of VOCs and thermal or catalytic oxidation (98% control) 2. Capture of VOCs and carbon adsorption (95% control) 3. Capture of VOCs and absorption (90% control) 4. Capture of VOCs and condensation (70% control) 	

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

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

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

APPENDIX C

Top-Down Analysis

Top Down BACT Analysis for VOC 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:

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

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

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 effectiveness 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.

Collection System Capital Investment (based on ductwork):

A common feature of all the identified technologically feasible options is that they require installation of a collection system to capture and deliver the emissions from the tank to the control device. The cost of the collection system is based on the following:

- The costs for the ductwork and the required clean-in-place system are based on information from the 2005 Eichleay Study. The 2005 Eichleay Study was used in development of District Rule 4694 *Wine Fermentation and Storage Tanks* and includes substantial information on the costs and details of the potential application of VOC controls to wineries and addresses many of the technical issues of the general site specific factors for wineries.
- The District performed a cost survey of stainless steel ducting/piping and found that the values stated in the Eichleay report including the cost of inflation (applied as stated below) were cheaper; therefore, as a conservative estimate, the District will use the cost of ducting/piping from the Eichleay report which will include ducting, fittings, bolt up, handle, and install. A summary of the survey is included in Attachment C1.
- Eichleay's cost estimate for ducting included the duct, fittings, bolt up, handle and install. When additional costs, as allowed for in the EPA Control Cost Manual, were added onto the ducting cost estimate, the facility double counted some of the costs that Eichleay already accounted for in their estimate; therefore, the District did not allow the additional costs for foundations & supports, handling & erection, electrical, piping or painting.
- The inflation amounts of 29.98% for the period of 2005 to 2018, and 3.31% for the period from 2006 to 2018 were taken from United States Department of Labor Bureau of Labor Statistics' CIP Inflation Calculator will be used:
http://www.bls.gov/data/inflation_calculator.htm.
- A minimum duct size is established at six inches diameter at each tank to provide adequate strength for spanning between supports.
- Sales Tax: This facility is located in Parlier, CA, which has a current sales tax rate of 7.975%. 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 4.0375% (7.975% - 3.9375%).
- Project Contingency: For detailed estimates, the Association for the Advancement of Cost Engineering International recommends a contingency factor of 15%, while the Electric Power Research Institute recommends a contingency of 10% to 20% (<ftp://ftp.repec.org/opt/ReDIF/RePEc/sip/04-005.pdf>). Therefore, a cost contingency of 15%

will be applied to the detailed estimates provided in these cost analyses. Additionally, since both the direct and indirect costs are detailed estimates and both of these categories of costs have uncertainty associated with them, the contingency will be applied to both the direct and indirect costs.

- Owner's cost is the cost to cover the project management, internal engineering, and operations planning required to implement a significant new process technology of this scale in a commercial winery. No owner's cost was specifically requested by the facility at this time; therefore, as a conservative estimate, the owner's cost will be set equal to \$0 for the purposes of this BACT analysis.

Ductwork Cost¹				
Item	Cost/Unit	# of Units	Cost	Inflation Adjusted Total Cost
SS Ducting*	\$61/ft	\$19 ft	\$1,159	\$1,197
Knockout Drum	\$46,300/drum	1	\$46,300	\$47,833
Structural Support Allowance	\$5,000/tank	1	\$5,000	\$5,166
Total				\$54,196

* Conservative length of SS ducting = width of tank + 5 ft spacing.

¹ Originally from project N-1160024.

The following cost data is taken from EPA Control Cost Manual, Sixth Edition (EPA/452/B 02-001)

Capital Cost of Ductwork for Wine Storage Tanks	
Cost Description	Cost (\$)
Ducting adjusting factor for inflation from 2005 dollars to 2018 dollars (29.98%)	1.2998
Other items adjusting factor for inflation from 2016 dollars to 2018 dollars (3.31%)	1.0331
Inflation adjusted ductwork cost	\$54,196
The following cost data is taken from EPA Control Cost Manual, Sixth Edition (EPA/452/B-02-001).	
Direct Costs	
Base Equipment Costs (Ductwork) See Above	\$54,196
Instrumentation (not required)	-
Sales Tax – 4.0375% of base equipment	\$2,188
Freight - 5% of base equipment	\$2,710
Purchased equipment cost (PEC)	\$59,094
Foundations & supports 8% (allowance already included in Base Equipment Costs)	-
Handling & erection 14% (already included in Eichleay cost estimate)	-
Electrical 4% (not required)	-
Piping 2% (not required)	-
Painting 1% (not required)	-
Insulation - 1% of PEC	\$ 591
Direct installation costs (DIC)	\$ 591
Total Direct Costs (DC) (PEC + DIC)	\$59,685
Indirect Costs	
Engineering - 10% of PEC	\$5,909
Construction and field expenses - 5% of PEC	\$2,955
Contractor Fees - 10% of PEC	\$5,909
Start-up - 2% of PEC	\$1,182
Performance Test - 1% of PEC	\$ 591
Total Indirect Costs (IC)	\$16,546
Subtotal Capital Investment (SCI) (DC + IC)	\$76,231
Contingencies - 15% of SCI	\$11,435
Total Capital Investment (TCI) (SCI + Contingency)	\$87,666

Annualized Capital Investment = Initial Capital Investment x Amortization Factor

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

$$\begin{aligned} \text{Annualized Capital Investment for Ductwork} &= \$87,666 \times 0.163 \\ &= \$14,290 \end{aligned}$$

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

Thermal Oxidizer Annual Operating and Maintenance Costs

Annual costs (Based on: EPA Air Pollution Control Cost Manual, Sixth Edition (January 2002), Section 3.2: VOC Destruction Controls, Chapter 2: Incinerators (September 2000), Table 2.10 - Annual Costs for Thermal and Catalytic Incinerators Example Problem. United States Environmental Protection Agency Office of Air Quality Planning and Standards. Research Triangle Park, North Carolina 27711. EPA/452/B-02-001).

Thermal/Catalytic Oxidizer Annual Operating and Maintenance Costs			
Direct Annual Cost (DAC)			
Operating Labor			
Operator	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Supervisor	15% of operator		\$1,013
Maintenance			
Labor	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Maintenance	100% of labor		\$6,753
Utility			
Natural Gas	not included		\$0
Electricity	not included		\$0
Total DAC			\$21,272
Indirect Annual Cost (IAC)			
Overhead	60% of Labor Cost	0.6 x (\$6,753 + \$1,013 + \$6,753 + \$6,753)	\$12,763
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$27,263
Annual Operating Cost (DAC + IAC)			\$49,035

Total Annual Cost

$$\begin{aligned} \text{Total Annual Cost} &= \text{Ductwork} + \text{Annual Operating and Maintenance} \\ &= \$14,290 + 49,035 \\ &= \$63,325 \end{aligned}$$

Emission Reductions

$$\begin{aligned} \text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.98 \\ &= 149 \text{ lb/yr} \times 0.98 \\ &= 146 \text{ lb/yr} \\ &= 0.073 \text{ tons/yr} \end{aligned}$$

Cost Effectiveness

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

$$\begin{aligned} \text{Cost Effectiveness} &= \$63,325/\text{yr} \div 0.073 \text{ tons/yr} \\ &= \$867,466/\text{ton} \end{aligned}$$

The analysis demonstrates that the annualized cost of the ductwork and the annual operating and maintenance costs 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):

Carbon Adsorption Annual Operation and Maintenance Costs

The annual operation and maintenance costs for the carbon adsorption system are based on the information given in the EPA Air Pollution Control Cost Manual, Sixth Edition (January 2002), Section 3.1: VOC Recapture Controls, Chapter 1: Carbon Adsorbers (September 1999). No value will be given for the ethanol that may be potentially recovered since this ethanol could actually result in additional disposal costs, which will also not be quantified in this analysis.

Carbon Adsorption Annual Operating and Maintenance Costs			
Direct Annual Cost (DAC)			
Operating Labor			
Operator	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Supervisor	15% of operator		\$1,013
Maintenance			
Labor	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Maintenance	100% of labor		\$6,753
Utility			
Electricity	not included		-
Total DAC			\$21,272
Indirect Annual Cost (IAC)			
Overhead	60% of Labor Cost	0.6 x (\$6,753+ \$1,013 + \$6,753 + \$6,753)	\$12,763
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$27,763
Annual Cost (DAC + IAC)			\$49,035

Total Annual Cost

$$\begin{aligned}\text{Total Annual Cost} &= \text{Ductwork} + \text{Annual Operating and Maintenance} \\ &= \$14,290 + 49,035 \\ &= \$63,325\end{aligned}$$

Emission Reductions

$$\begin{aligned}\text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.95 \\ &= 149 \text{ lb/yr} \times 0.95 \\ &= 142 \text{ lb/yr} \\ &= 0.071 \text{ tons/yr}\end{aligned}$$

Cost Effectiveness

$$\text{Cost Effectiveness} = \text{Total Annual Cost} \div \text{Annual Emission Reductions}$$

$$\begin{aligned}\text{Cost Effectiveness} &= \$63,325/\text{yr} \div 0.071 \text{ tons/yr} \\ &= \$891,901/\text{ton}\end{aligned}$$

The analysis demonstrates that the annualized purchase cost of the ductwork and annual operating and maintenance costs 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):

Scrubber Annual Operating and Maintenance Costs			
Direct Annual Cost (DAC)			
Operating Labor			
Operator	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Supervisor	15% of operator		\$1,013
Maintenance			
Labor	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Maintenance	100% of labor		\$6,753
Utility			
Electricity	not included		-
Total DAC			\$21,272
Indirect Annual Cost (IAC)			
Overhead	60% of Labor Cost	0.6 x (\$6,753 + \$1,013 + \$6,753 + \$6,753)	\$12,763
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$27,763
Annual Cost (DAC + IAC)			\$49,035

Total Annual Cost

$$\begin{aligned}\text{Total Annual Cost} &= \text{Ductwork} + \text{Annual Operating and Maintenance} \\ &= \$14,290 + 49,035 \\ &= \$63,325\end{aligned}$$

Emission Reductions

$$\begin{aligned}\text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.90 \\ &= 149 \text{ lb/yr} \times 0.90 \\ &= 134 \text{ lb/yr} \\ &= 0.067 \text{ tons/yr}\end{aligned}$$

Cost Effectiveness

$$\text{Cost Effectiveness} = \text{Total Annual Cost} \div \text{Annual Emission Reductions}$$

$$\begin{aligned}\text{Cost Effectiveness} &= \$63,325/\text{yr} \div 0.067 \text{ tons/yr} \\ &= \$945,149/\text{ton}\end{aligned}$$

The analysis demonstrates that the annualized purchase cost of the ductwork and required CIP system, and annual operating and maintenance costs 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):

Condenser Annual Operating and Maintenance Costs			
Direct Annual Cost (DAC)			
Operating Labor			
Operator	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Supervisor	15% of operator		\$1,013
Maintenance			
Labor	0.5 hr/shift	\$18.50/hr x 0.5 hr/shift x 2 shift/day x 365 days/year x 1 unit	\$6,753
Maintenance	100% of labor		\$6,753
Utility			
Electricity	not included		-
Total DAC			\$21,272
Indirect Annual Cost (IAC)			
Overhead	60% of Labor Cost	0.6 x (\$6,753 + \$1,013 + \$6,753 + \$6,753)	\$12,763
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$27,763
Annual Cost (DAC + IAC)			\$49,035

Total Annual Cost

$$\begin{aligned}\text{Total Annual Cost} &= \text{Ductwork} + \text{Annual Operating and Maintenance} \\ &= \$14,290 + 49,035 \\ &= \$63,325\end{aligned}$$

Emission Reductions

$$\begin{aligned}\text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.70 \\ &= 149 \text{ lb/yr} \times 0.70 \\ &= 104 \text{ lb/yr} \\ &= 0.052 \text{ tons/yr}\end{aligned}$$

Cost Effectiveness

$$\text{Cost Effectiveness} = \text{Total Annual Cost} \div \text{Annual Emission Reductions}$$

$$\begin{aligned}\text{Cost Effectiveness} &= \$63,325/\text{yr} \div 0.052 \text{ tons/yr} \\ &= \$1,217,788/\text{ton}\end{aligned}$$

The analysis demonstrates that the annualized purchase cost of the ductwork and required CIP system, and annual operating and maintenance costs 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. The proposed wine storage tank 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 this project.

ATTACHMENT C1

Ducting Cost Survey

Ducting/Piping Cost Comparison

Duct Size Diameter (in.)	2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"	28"
Eichleay - Ducting/Piping Only \$/Foot	-	-	-	\$23.17	\$38.59	\$54.00	\$62.00	\$65.50	\$69.00	\$86.00	\$92.00	\$99.00	\$106.00	\$119.00
Eichleay - Ducting/Piping Only \$/Foot Including 21.93% for Inflation	-	-	-	\$28.25	\$47.05	\$65.84	\$75.60	\$79.86	\$84.13	\$104.86	\$112.18	\$120.71	\$129.25	\$145.10
Average of District Cost Survey in \$/Foot	\$15.49	\$30.85	\$27.67	\$44.13	\$37.50	\$33.13	\$93.75	\$181.70	\$216.50	\$189.02	\$308.40	-	\$193.99	-

Ducting/Piping Costs based on Eichleay Report

Duct Size Diameter (in.)	Note: Minimum of 6" Diameter for Structural Support			
	2"	3"	4"	6"
Ducting/Piping Only \$/Foot	-	-	-	\$23.17
Ducting + Fittings, Bolt Up, Handling, & Install \$/Foot	-	-	-	\$62.17
Ducting + Fittings, Bolt Up, Handling, & Install \$/Foot	-	-	-	\$62.17

Supplier: Grainger (<http://www.grainger.com>)

		Location: Fresno, CA and Ceres, CA												
Schedule 10		2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Duct Size Diameter (in.)		2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price (\$)		\$229.50	\$387.75	\$587.50	-	-	-	-	-	-	-	-	-	-
Length (feet)		10	10	10	-	-	-	-	-	-	-	-	-	-
Price/Foot (\$)		\$22.95	\$38.78	\$58.75	-	-	-	-	-	-	-	-	-	-

Supplier: Stockton Pipe and Supply Inc (<http://www.stocktonpipe.net>)

		Location: Stockton, CA												
0.109" thickness tube of Schedule 10 Pipe		2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Duct Size Diameter (in.)		2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price (\$)		-	-	-	-	-	\$700.00	\$840.00	-	-	-	-	-	\$3,159.60
Length (feet)		-	-	-	-	-	20	20	-	-	-	-	-	20
Price/Foot (\$)		-	-	-	-	-	\$35.00	\$42.00	-	-	-	-	-	\$157.98

Supplier: Valley Iron Inc (<http://www.stocktonpipe.net>)

		Location: Fresno, CA												
Schedule 10 Pipe		2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Duct Size Diameter (in.)		2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Length (feet)		-	-	-	-	-	20	20	-	-	-	-	-	-
Price/Foot (\$)		-	-	\$10.75	\$16.90	\$26.00	\$33.90	-	-	-	-	-	-	-

Supplier: Del Paso Pipe & Steel Inc. (<http://www.delpasopipeandsteel.com/>) Location: Sacramento, CA

Schedule 5/10 Pipe:													
Duct Size Diameter (in.)	2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price Quote: \$9/lb													
Estimated Price/Foot	--	--	--	--	--	--	\$217.00	\$250.00	\$286.00	\$322.00	\$432.00	--	--

Supplier: Hayward Pipe & Supply Co. Inc (<http://www.haywardpipe.com/>) Location: Hayward, CA

Note: large diameter pipe ships from Texas, FREIGHT NOT QUOTED - Additional Shipping Costs apply													
Schedule 10 Pipe													
Duct Size Diameter (in.)	2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price (\$)	--	--	--	--	--	--	\$1,540.00	\$2,268.00	\$2,940.00	\$3,276.00	\$3,696.00	--	--
Length (feet)	--	--	--	--	--	--	20	20	20	20	20	--	--
Price/Foot (\$)	--	--	--	--	--	--	\$77.00	\$113.40	\$147.00	\$163.80	\$184.80	--	--

Supplier: OnlineMetals.com (<http://www.onlinemetals.com/>) Location: Nearest Warehouse - Los Angeles, CA

Schedule 10 Pipe													
Duct Size Diameter (in.)	2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price (\$)	\$78.28	\$108.97	\$160.34	\$288.00	\$520.00	--	--	--	--	--	--	--	--
Length (feet)	8	8	8	8	8	--	--	--	--	--	--	--	--
Price/Foot (\$)	\$9.79	\$13.62	\$20.04	\$36.00	\$65.00	--	--	--	--	--	--	--	--
Weldeds Stainless Tube 304/304L (2" OD, 0.12" Wall; 3" OD, 0.12" Wall; 6" OD, 0.12")													
Duct Size Diameter (in.)	2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price (\$)	\$109.86	\$321.34	--	\$628.16	--	--	--	--	--	--	--	--	--
Length (feet)	8	8	--	8	--	--	--	--	--	--	--	--	--
Price/Foot (\$)	\$13.73	\$40.17	--	\$78.52	--	--	--	--	--	--	--	--	--

Supplier: Lone Star Supply Co Location: Dickinson, TX

Note: Additional shipping costs													
Schedule 10 Welded Pipe													
Duct Size Diameter (in.)	2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price/Foot (\$)	--	--	\$16.45	\$19.60	\$21.50	\$30.50	\$39.00	--	--	\$81.25	--	--	\$230.00

Supplier: Global Technology and Engineering Location: Excelsior Springs, MO

Note: Additional shipping Costs													
11 Gauge Tubing													
Duct Size Diameter (in.)	2"	3"	4"	6"	8"	10"	12"	14"	16"	18"	20"	22"	24"
Price (\$)	--	--	\$226.58	\$487.40	--	--	--	--	--	--	--	--	--
Length (feet)	--	--	7	7	--	--	--	--	--	--	--	--	--
Price/Foot (\$)	--	--	\$32.37	\$69.63	--	--	--	--	--	--	--	--	--

Only suppliers that have both 3" and 6" All suppliers \$30.85 \$44.13 70% \$57.26 \$30.85 54% 33.50034

APPENDIX D

Statewide Compliance Certification



O'NEILL
VINTNERS & DISTILLERS

October 18th 2018

Mr. Fukuda Derek, P.E.
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Ave,
Fresno, Ca 93726-0244

Re: O'Neill Beverage Co. - Application for new ATCs

Dear Mr. Fukuda,

This letter is provided in response to a request concerning O'Neill Beverage Co. application to the San Joaquin Valley Air Board for authority to construct 1 new storage tank under our current SLC. Other than the Parlier, California facility which is subject to the application, neither O'Neill, nor any other entity which controls, is controlled by, or is under common control with O'Neill owns or operates any "major stationary source" (as defined by the federal clean air act, Title 42 United States Code, sections 7401 *et. Seq.* for purposes of District Rule 2201, section 4.15.2) within the State of California.

Please feel free to contact me at (559) 638-3544 with any comments or concerns.

Sincerely,

Erik Ettner

Brandy Maker

O'Neill Vintners and Distillers