



March 28, 2022

Mr. Paul Scherbak
CBUS Ops, Inc. (dba Woodbridge Winery)
P.O. Box 1260
Woodbridge, CA 95258

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Facility Number: N-2321
Project Number: N-1213849

Dear Mr. Scherbak:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project involves using various existing wine storage and fermentation tanks to store and blend high proof spirits.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authorities to Construct with Certificates of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

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

Thank you for your cooperation in this matter.

Sincerely,

Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Laura Yannayon, EPA (w/enclosure) via EPS

Samir Sheikh
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District

Authority to Construct Application Review

High Proof Spirits Storage

Facility Name: CBUS Ops, Inc. (dba Woodbridge Winery) Date: March 21, 2022
Mailing Address: P.O. Box 1260 Engineer: Kevin Perez
Woodbridge, CA 95258 Lead Engineer: James Harader
Contact Person: Paul Scherbak
Telephone: (707) 200-5222
E-Mail: paul.scherbak@cbrands.com
Application #s: N-2321-279-5, '-280-7, '-281-5, '-282-7, '-315-5, '-316-5, '-317-5, '-318-5,
'-319-5, '-320-5, '-899-3, '-900-3, '-901-3, '-902-3, '-903-3, and '-904-3
Project #: N-1213849
Deemed Complete: January 19, 2022

I. Proposal

CBUS Ops, Inc. (dba Woodbridge Winery) has submitted an Authority to Construct (ATC) permit application to modify existing tanks used for wine storage and fermentation to permit the storage and blending of high proof spirits as a new operation. This project only involves spirits storage/blending emission units. Wine fermentation and storage currently conducted in these tanks are separate emission units.

The facility proposes to produce various high proof spirits products from the winery. Production will be handled by existing wine storage tanks at the facility through the following steps:

Initial Blending Tanks

The facility proposes to use four tanks (permits N-2321-279 through N-2321-282) for the initial blending of the high proof spirits. Under ATC project N-1212116, high proof spirits storage was permitted for two of these tanks through ATCs N-2321-280-5 and N-2321-282-5. These ATCs have not been implemented and the applicant is proposing to re-permit these tanks in this project with a new combined throughput; therefore, the existing ATCs will be cancelled and replaced with the ATCs from this project, and the high proof spirits storage operation will be treated as a new emissions unit for each of the four initial blending tanks. The following conditions will be included on the ATCs:

N-2321-280-7

- The Authority to Construct (ATC) permit N-2321-280-5 shall be cancelled and replaced with this permit. [District Rule 2201]

N-2321-282-7

- The Authority to Construct (ATC) permit N-2321-282-5 shall be cancelled and replaced with this permit. [District Rule 2201]

Final Blending Tanks

The facility proposes to use six tanks (permits N-2321-315 through N-2321-320) to store the final blend of high proof spirits. The addition of high proof spirits products in these tanks will be considered new emission units in this project.

Seltzer Process/High Proof Spirits Storage and Bottling Tanks

The facility proposes to use existing Seltzer process bottling tanks under permits N-2321-899 through N-2321-904 for high proof spirits storage. Under ATC project N-1212116, high proof spirits storage was permitted for these tanks through ATCs N-2321-899-1, '-900-1, '901-1, '-902-1, '-903-1, and '-904-1. These ATCs have not been implemented and the applicant is proposing to re-permit these tanks with a new combined throughput; therefore, the existing ATCs shall be cancelled and replaced with the ATCs from this project, and the high proof spirits storage operation shall be treated as a new emissions unit for each of these six tanks. The following conditions shall be included on the ATCs:

N-2321-899-3

- The Authority to Construct (ATC) permit N-2321-899-1 shall be cancelled and replaced with this permit. [District Rule 2201]
- Authority to Construct (ATC) N-2321-899-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]

N-2321-900-3

- The Authority to Construct (ATC) permit N-2321-900-1 shall be cancelled and replaced with this permit. [District Rule 2201]
- Authority to Construct (ATC) N-2321-900-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]

N-2321-901-3

- The Authority to Construct (ATC) permit N-2321-901-1 shall be cancelled and replaced with this permit. [District Rule 2201]
- Authority to Construct (ATC) N-2321-901-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]

N-2321-902-3

- The Authority to Construct (ATC) permit N-2321-902-1 shall be cancelled and replaced with this permit. [District Rule 2201]
- Authority to Construct (ATC) N-2321-902-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]

N-2321-903-3

- The Authority to Construct (ATC) permit N-2321-903-1 shall be cancelled and replaced with this permit. [District Rule 2201]
- Authority to Construct (ATC) N-2321-903-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]

N-2321-904-3

- The Authority to Construct (ATC) permit N-2321-904-1 shall be cancelled and replaced with this permit. [District Rule 2201]
- Authority to Construct (ATC) N-2321-904-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]

The draft ATCs from this project are included in Appendix A.

CBUS Ops, Inc. (dba Woodbridge Winery) received their Title V Permit on March 31, 2007. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. CBUS Ops, Inc. (dba Woodbridge Winery) must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (8/15/19)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (8/15/19)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4623	Storage of Organic Liquids (5/19/05)
Rule 4694	Wine Fermentation and Storage Tanks (12/15/05)
Rule 4695	Brandy Aging and Wine Aging Operations (9/17/09)

CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA
Guidelines

III. Project Location

The facility is located at 5950 E Woodbridge Road in Acampo, 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

The facility will use existing wine tanks for the initial blending and storage of the high proof spirits products prior to packaging for distribution. The blending process will consist of the following steps:

High proof spirits are delivered to the facility via truck and transferred to each of the initial blending tanks (permits N-2321-279 through N-2321-282), which are pre-filled with carbon filtered water or juice at a 1:5 volume ratio. This ratio results in a maximum alcohol content of 20% by volume. After initial blending, the high proof spirits are transferred to the final blending tanks under permits N-2321-315 through N-2321-320 to be further diluted with carbon filtered water or juice down to a final blend of 15% alcohol by volume. Based on the specific high proof spirits cocktail recipe, sucrose and alcoholic liquid flavoring may also be added to the blend tanks.

V. Equipment Listing

Pre-Project Equipment Description:

N-2321-279-4: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 761 WITH PRESSURE/VACUUM VALVE AND INSULATION

N-2321-280-4: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 762 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.

N-2321-281-4: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 763 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.

- N-2321-282-4: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 764 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.
- N-2321-315-4: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 921 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-316-4: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 922 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-317-4: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 923 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-318-4: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 924 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-319-4: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 925 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-320-4: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 926 WITH PRESSURE/VACUUM VALVE AND INSULATION
- ATC N-2321-899-0: 12,000 GALLON NOMINAL STAINLESS STEEL BLENDING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION
- ATC N-2321-900-0: 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION
- ATC N-2321-901-0: 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #2 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION
- ATC N-2321-902-0: 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #3 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION
- ATC N-2321-903-0: 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #4 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION
- ATC N-2321-904-0: 12,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION

Proposed Modification:

The proposed modifications under this project include the following:

Initial Blend Tanks

- Allow for the storage of spirits in tanks from permits N-2321-279 through N-2321-282 at maximum of 20% alcohol by volume
- Spirits storage will not exceed 6,175,000 gal/year between the 4 tanks from permits N-2321-279 through N-2321-282
- Tanks used for initial blending will continue to store wine under the conditions prescribed in existing permits N-2321-279 through N-2321-282, when not handling blended spirits

Final Blend Tanks

- Allow for the storage of spirits in tanks from permits N-2321-315 through N-2321-320 at a maximum of 15% alcohol by volume
- Spirits storage will not exceed 8,381,333 gal/year between the 6 tanks from permits N-2321-315 through N-2321-320
- The tanks used for final blending will continue to store wine under the conditions prescribed in existing permits N-2321-315 through N-2321-320, when not handling blended spirits

Seltzer/High Proof Spirits Storage and Bottling Tanks

- Allow for the storage of spirits in tanks from permits N-2321-899 through N-2321-904 at a maximum concentration of 15% alcohol by volume
- Spirits storage would not exceed 4,380,000 gal/year for the tank from permit N-2321-899, not exceed 838,654 gal/year for each tank from permits N-2321-900 through N-2321-903, and not exceed 1,677,308 gal/year for the tank from permit N-2321-904

N-2321-279-5: MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 761 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-280, N-2321-281, AND N-2321-282, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

N-2321-280-7: MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 762 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-279, N-2321-281, AND N-2321-282, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

N-2321-281-5: MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 763 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED

LIMIT WITH PERMITS N-2321-279, N-2321-280, AND N-2321-282, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

N-2321-282-7: MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 764 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-280, N-2321-281, AND N-2321-281, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

N-2321-315-5: MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 921 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-316, N-2321-317, N-2321-318, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

N-2321-316-5: MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 922 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-317, N-2321-318, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

N-2321-317-5: MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 923 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-318, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

N-2321-318-5: MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 924 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-317, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

N-2321-319-5: MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 925 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-317, N-2321-318 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

N-2321-320-5: MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 926

WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-317, N-2321-318 AND N-2321-319, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

N-2321-899-3: MODIFICATION OF 12,000 GALLON NOMINAL STAINLESS STEEL BLENDING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 4,380,000 GAL/YEAR OF HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

N-2321-900-3: MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

N-2321-901-3: MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #2 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

N-2321-902-3: MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #3 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

N-2321-903-3: MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #4 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

N-2321-904-3: MODIFICATION OF 12,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 1,677,308 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS TO 15% BY VOLUME

Post-Project Equipment Description:

N-2321-279-5: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 761 WITH PRESSURE/VACUUM VALVE AND INSULATION

- N-2321-280-7: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 762 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.
- N-2321-281-5: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 763 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.
- N-2321-282-7: 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 764 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.
- N-2321-315-5: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 921 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-316-5: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 922 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-317-5: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 923 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-318-5: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 924 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-319-5: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 925 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-320-5: 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE/SPIRITS STORAGE TANK 926 WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-899-3: 12,000 GALLON NOMINAL STAINLESS STEEL WINE AND SPIRITS BLENDING TANK #935 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-900-3: 6,000 GALLON NOMINAL STAINLESS STEEL WINE AND SPIRITS BOTTLING TANK #1 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION
- N-2321-901-3: 6,000 GALLON NOMINAL STAINLESS STEEL WINE AND SPIRITS BOTTLING TANK #2 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION

N-2321-902-3: 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #3 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION

N-2321-903-3: 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #4 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION

N-2321-904-3: 12,000 GALLON NOMINAL STAINLESS STEEL WINE AND SPIRITS BOTTLING TANK #5 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION

VI. Emission Control Technology Evaluation

Volatile Organic Compounds (VOC) are the only pollutants of concern in the operation of the existing tanks and the high proof spirits blending and bottling operation. VOC emissions from storage are controlled via the following procedures:

- Insulated tanks
- Pressure vacuum relief valves (PVRV) set within 10% of the maximum allowable working pressure of the tank
- Gas tight tank operations
- Continuous storage temperature not exceeding 75 degrees Fahrenheit

No modification to the existing emission controls on any of the tanks is proposed.

VII. General Calculations

A. Assumptions

- VOCs are the only pollutant of concern for this project
- Storage of high proof spirits is considered to be a separate emissions unit from both the wine storage and wine fermentation emissions units
- The applicant is not proposing to modify the wine fermentation operations and wine storage operations conducted in these tanks, so emissions for these operations will be unchanged and emissions calculations for wine storage and fermentation will not be necessary
- For enclosed tanks with insulation (or equivalent) and Pressure Vacuum (P/V) valves, breathing losses from wine or spirits storage operations are assumed to be negligible

B. Emission Factors

Emission factors for the storage of High Proof Spirits are derived from the District's generally accepted emission factors for this type of operation, which are based on the maximum alcohol content and meteorology at the tank location.

N-2321-279 through ‘-282

Spirits Storage

Type	Maximum Ethanol Content	Daily EF (lb-VOC/1,000 gallon Tank Throughput)	Annual EF (lb-VOC/1,000 gallon Tank Throughput)
Spirits	20%	0.303	0.175

N-2321-315 through ‘-320 and N-2321-899 through ‘-904

Spirits Storage

Type	Maximum Ethanol Content	Daily EF (lb-VOC/1,000 gallon Tank Throughput)	Annual EF (lb-VOC/1,000 gallon Tank Throughput)
Spirits	15%	0.239	0.137

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Spirits Storage (N-2321-279 through ‘-282, N-2321-315 through ‘-320 and N-2321-899 through ‘-904)

The proposed distilled spirits operations in each existing tank will be evaluated as a new emissions unit; therefore, PE1 = 0 for all pollutants.

2. Post-Project Potential to Emit (PE2)

Spirits Storage (N-2321-279 through N-2321-282)

Daily PE2 for Each Unit			
Type	Daily Throughput (gallon/day)	EF (lb-VOC/1,000 gallon Tank Throughput)	PE2 (lb-VOC/day)
Spirits Storage	31,000	0.303	9.4
Total			9.4

Annual PE2 ¹			
Permit	Annual Throughput (gallon/yr)	EF (lb-VOC/1,000 gallon Tank Throughput)	PE2 (lb-VOC/yr)
Spirits Storage	6,175,000	0.175	1,081
Total			1,081

¹ The facility has proposed a combined maximum throughput of 6,175,000 gal/year of spirits for permits N-2321-279 through ‘-282. Therefore, the annual emissions are emissions from permits N-2321-279 through ‘-282 combined.

Spirits Storage (N-2321-315 through N-2321-320)

Daily PE2 for Each Unit			
Type	Daily Throughput (gallon/day)	EF (lb-VOC/1,000 gallon Tank Throughput)	PE2 (lb-VOC/day)
Spirits Storage	26,000	0.239	6.2
Total			6.2

Annual PE2²			
Permit	Annual Throughput (gallon/yr)	EF (lb-VOC/1,000 gallon Tank Throughput)	PE2 (lb-VOC/yr)
Spirits Storage	8,381,333	0.137	1,148
Total			1,148

Spirits Storage (N-2321-899 through N-2321-904)

Daily PE2, Spirits Storage Emissions (does not include wine storage/fermentation)			
Permit	Daily Throughput (gallon/day)	EF (lb-VOC/1,000 gal)	PE2 (lb-VOC/day)
N-2321-899-3	12,000	0.239	2.9
N-2321-900-3	6,000	0.239	1.4
N-2321-901-3	6,000	0.239	1.4
N-2321-902-3	6,000	0.239	1.4
N-2321-903-3	6,000	0.239	1.4
N-2321-904-3	12,000	0.239	2.9

Annual PE2, Spirits Storage (does not include wine storage/fermentation)			
Permit	Annual Throughput (gallon/yr)	EF (lb-VOC/1,000 gal)	PE2 (lb-VOC/yr)
N-2321-899-3	4,380,000	0.137	600
N-2321-900-3	838,654	0.137	115
N-2321-901-3	838,654	0.137	115
N-2321-902-3	838,654	0.137	115
N-2321-903-3	838,654	0.137	115
N-2321-904-3	1,677,308	0.137	230

Total Project PE2

Total Project PE2	
Daily Total Project PE2	86.2 lb-VOC/day
Annual Total Project PE2	3,519 lb-VOC/yr

² The facility has proposed a combined maximum throughput of 8,381,333 gal/year of spirits for permits N-2321-315 and '-320. Therefore, the annual emissions are emissions from permits N-2321-315 and '-320 combined.

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.

The facility has an existing SLC that limits VOC emissions from all wine fermentation and wine storage operations to 1,167,178 lb/year (equivalent to 583.6 ton/year). Facility emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, further 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.

Since the emissions are already above the Offset and Major Source Thresholds for VOC emissions, 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 a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status, the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months), pursuant to the Clean Air Act, Title 3, Section 302, US Codes 7602(j) and (z)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 70.2

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 has an existing SLC that limits VOC emissions from all wine fermentation and wine storage operations to 1,167,178 lb/year (equivalent to 583.6 ton/year). Since the emissions from these operations alone exceed a PSD major source threshold of 250 ton/year, no other units that emit VOCs need to be evaluated for Rule 2410 Major Source determination purposes. Therefore, the facility is an existing PSD major source for at least one pollutant.

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,

$BE = \text{Historic Actual Emissions (HAE)}$, calculated pursuant to District Rule 2201.

This project only involves the high proof spirits emission units; therefore, the BE discussion will be limited to those units. As mentioned in Section I, the storage of high proof spirits are new emissions units for all permit units. Therefore, $BE = PE1 = 0$ for all pollutants for the spirits storage operations.

7. SB 288 Major Modification

40 CFR Part 51.165 defines a SB 288 Major Modification 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. As discussed above in Section VII.A, the wine fermentation operation and the wine storage operation are not modified under this project. Therefore, the VOC emissions from these operations will not be included in the Federal Major Modification calculations.

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

As calculated in the Calculation section above:

SB 288 Major Modification Threshold			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
VOC	3,519	50,000	No

Since the SB 288 Major Modification Threshold for VOC is not surpassed with this project, this project does not constitute an SB 288 Major Modification and no further discussion is required.

8. Federal Major Modification / New Major Source

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.

As defined in 40 CFR 51.165, Section (a)(1)(v) and part D of Title I of the CAA, a Federal Major Modification is 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. The significant net emission increase threshold for each criteria pollutant is included in Rule 2201.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. In step 1, emission decreases cannot cancel out the increases. Step 2 allows consideration of the project’s net emissions increase as described in 40 CFR 51.165 and the Federal Clean Air Act Section 182 (e), as applicable.

Step 1: Project Emissions Increase

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

Emission Increase = PE2

Project Emissions Increase

N-2321-279 through N-2321-282

N-2321-315 through N-2321-320

N-2321-899 and N-2321-904

The annual VOC emission increase for each of these units is greater than zero; therefore, each of these individual units triggers a Federal Major Modification.

N-2321-900 through N-2321-903

Per District Policy APR 1150, for purposes of determining if a new or modified emission unit is part of a Federal Major Modification, if the annual emission increase for the emission unit when divided by 365 is less than or equal to 0.5 lb./day, such an increase

shall be rounded to 0. The sum of the emission increases from new or modified emission units involved in this project that round to 0 shall not constitute a Federal Major Modification.

The annual emissions increase for each new emissions unit calculated in Section VII.C.2 when divided by 365 is:

$$115 \text{ lb-VOC/year} \div 365 \text{ days/year} = 0.3 \text{ lb-VOC/day.}$$

As discussed above, according to District Policy APR 1150, the annual emission increase for VOCs is less than 0 for VOC. Therefore, none of these individual units triggers a Federal Major Modification.

In conclusion, the project’s combined total emission increases are calculated above and summarized in the following table and are compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NO _x *	0	0	No
VOC*	3,519	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. Consequently, as discussed below in the offset section of this evaluation, pursuant to Section 7.4.2.1 of District Rule 2201, VOC Emission Reduction Credits (ERCs) used to satisfy the offset quantity required under District Rule 2201 must surplus at the time of use (ATC issuance).

Separately, Federal Offset Quantity is calculated below.

Federal Offset Quantity Calculation

The Federal Offset Quantity (FOQ) is only calculated for the pollutants for which a project is a Federal Major Modification or a New Major Source as determined above.

Pursuant to 40 CFR 51.165(a)(3)(ii)(J), 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) for each emission unit times the applicable federal offset ratio.

$$FOQ = \sum(PE2 - AE) \times \text{Federal offset ratio}$$

Actual Emissions

As described in 40 CFR 51.165(a)(1)(xii), actual emissions (AE), as of a particular date, shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of normal source operation. The reviewing authority shall allow the use of a different time period upon a determination that it is more representative of normal source operation.

Since these are new emission units, AE = 0

Federal Offset Ratio

According the CAA 182(e), the federal offset ratio for VOC is 1.5 to 1 (due to the District extreme non-attainment status for ozone).

Federal Offset Quantity (FOQ)

Since this project only include new unit(s)

$$FOQ = PE2 \times \text{Federal offset ratio}$$

VOC

Permit No.	Post-Project Potential to Emit (PE2) (lb/year)	Actual Emissions (lb/year)	Emissions Change (lb/yr)
N-2321-279-5	1,081	0	1,081
N-2321-280-7			
N-2321-281-5			
N-2321-282-7			
N-2321-315-5	1,148	0	1,148
N-2321-316-5			
N-2321-317-5			
N-2321-318-5			
N-2321-319-5			
N-2321-320-5	600	0	600
N-2321-899-3			
N-2321-900-3	115	0	115

N-2321-901-3	115	0	115
N-2321-902-3	115	0	115
N-2321-903-3	115	0	115
N-2321-904-3	230	0	230
Federal Offset Quantity (lb/year): $\sum(\text{PE2} - \text{AE}) \times 1.5$			5,279
Federal Offset Quantity (tons/year): $\sum(\text{PE2} - \text{AE}) \times 1.5 \div 2,000$			2.64

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

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

- VOC

I. Project Location Relative to Class 1 Area

As demonstrated in the “PSD Major Source Determination” Section above, the facility was determined to be a existing PSD Major Source. Because the project is not located within 10 km (6.2 miles) of a Class 1 area – modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Project Emission Increase – Significance Determination

a. Evaluation of Calculated Post-project Potential to Emit for New or Modified Emissions Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the post-project potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if the total potentials to emit from all new and modified units are below the applicable thresholds, no further PSD analysis is needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)	
	VOC
Total PE from New and Modified Units	1.76
PSD Significant Emission Increase Thresholds	40 ³
PSD Significant Emission Increase?	No

As demonstrated above, because the post-project total potentials to emit from all new and modified emission units are below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 and no further discussion 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 E.

VIII. Compliance Determination

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

Pursuant to District Rule 2201, Section 4.1, 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.

³ According to 40 CFR 52.21 (b) (23) (i) the PSD Emissions Increase threshold for Ozone – 40 tons/year of VOCs or NOx

*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 PE2 is greater than 2 lb/day for VOC for permits N-2321-279 through -282, N-2321-315 through -320, N-2321-899, and N-2321-904. BACT is triggered for the tanks under these permits. However, BACT is not triggered for the tanks corresponding to permits N-2321-900 through -903 because the PE2 from these emissions units is less 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

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

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project involves new emissions units only and does not constitute an SB 288 modification. Only units N-2321-279 through -282, N-2321-315 through -320, N-2321-899, and N-2321-904 trigger a Federal Major Modification and are therefore subject to BACT. BACT is not required for units N-2321-900 through N-2321-903 as the emissions increase from each of these units does not trigger a Federal Major Modification.

2. BACT Guideline

BACT Guideline 5.4.15, applies to distilled spirits storage tanks. (See 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 (see Appendix D), BACT has been satisfied with the following:

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

B. Offsets

1. Offset Applicability

Pursuant to District Rule 2201, Section 4.5, 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)	
	VOC
SSPE2	>20,000
Offset Thresholds	20,000
Offsets Triggered?	Yes

2. Quantity of District Offsets Required

VOC

District Offset Quantities Calculation

As demonstrated above, the facility has an SSPE2 for VOC 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.

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

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,

$$BE = HAE$$

As calculated in Section VII.C.6 above, the BE from all the units in this project is equal to the 0 because they are all new emissions units.

Also, there are no increases in cargo carrier emissions. Therefore offsets can be determined as follows:

$$\text{Offsets Required (lb/year)} = ([PE2 - BE] + ICCE) \times DOR$$

$$PE2 \text{ (VOC)} = 3,519 \text{ lb/year, sum of all units from this project}$$

$$BE \text{ (VOC)} = 0 \text{ lb/year}$$

$$ICCE = 0 \text{ lb/year}$$

$$\begin{aligned} \text{Offsets Required (lb/year)} &= ([3,519 - 0] + 0) \times DOR \\ &= 3,519 \text{ lb-VOC/year} \times DOR \end{aligned}$$

Based on the ERC being proposed to satisfy offset requirements, the offset ratio is 1.5:1, the amount of VOC ERCs that need to be withdrawn is:

$$\begin{aligned} \text{Offsets Required (lb/year)} &= ([3,519 - 0] + 0) \times 1.5 \\ &= 5,279 \text{ lb-VOC/year} \end{aligned}$$

$$\begin{aligned} \text{Quarterly Offsets Required (lb/qtr)} &= 5,279 \text{ (lb-VOC/year)} \div 4 \text{ qtr/year} \\ &= 1,319.75 \text{ lb-VOC/qtr} \end{aligned}$$

District and Federal Offset Quantities

As discussed above, District offsets are triggered and required for VOC under NSR. In addition, as demonstrated above, this project does trigger Federal Major Modification requirements for VOC emissions.

Since District offsets and federal offsets are required, the facility must provide offset amounts equal to the greatest value between the District offset quantity and the federal offset quantity.

Comparison of District vs Federal VOC Offset Quantity			
	DOQ	FOQ	FOQ ≥ DOQ
VOC	5,279	5,279	Yes

As demonstrated above, the federal offset quantity required is equal to the District offset quantity. Also, emission reduction credits used to satisfy federal offset quantities for VOC must be creditable and surplus at the time of use (ATC issuance).

Surplus at the Time Of Use Emission Reduction Credits

The applicant has stated that the facility plans to use ERC certificates C-1516-1 and S-5217-1 to satisfy the federal offset quantities for VOC required for this project. Pursuant to the ERC surplus analyses in Appendix F, the District has verified that the credits from the ERC certificates provided by the applicant are sufficient to satisfy the federal offset quantities for VOC required for this project.

Proposed Rule 2201 Offset Permit Conditions

The following permit conditions will be added to the Authorities to Construct:

All permits from this project

- Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter – 1,319 lb, 2nd quarter – 1,320 lb, 3rd quarter – 1,320 lb, and fourth quarter – 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201]
- ERC Certificates Number C-1516-1 and Number S-5217-1 (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]

3. ERC Withdrawal Calculations

The applicant must identify the ERC Certificate(s) to be used to offset the increase of VOC emissions for the project. As indicated in previous section, the applicant is proposing to use ERC certificates #C-1516-1 and #S-5217-1 to mitigate the increases of VOC emissions associated with this project. See Appendix H for detailed ERC Withdrawal Calculations.

C. Public Notification

1. Applicability

Pursuant to District Rule 2201, Section 5.4, 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

As demonstrated in Section VII.C.7 of this evaluation, this project is a Federal Major Modification. Therefore, public noticing is required for this project for Federal Major Modification purposes.

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 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

c. Offset Threshold

Public notification is required if the pre-project Stationary Source Potential to Emit (SSPE1) is increased to a level exceeding the offset threshold levels. The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with 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 demonstrated 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.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
VOC	>20,000 + 3,519	>20,000	3,519	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 for Federal Major Modification and Title V Significant Permit Modification purposes. Therefore, public notice documents will be submitted to the Environmental Protection Agency (EPA), California Air Resources Board (CARB) and a public notice will be electronically published on the District's website prior to the issuance of the ATCs 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.

N-2321-279-5, '-280-7, '-281-5, and '-282-7

- The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201]
- The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201]
- When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694]
- When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694]

- The ethanol content of wine or spirits stored in this tank shall not exceed 20 percent by volume. [District Rule 2201]
- When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 31,000 gallons on any given day. [District Rule 2201]
- Combined maximum spirits storage throughput for permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 calculated on a rolling 12-month basis, shall not exceed 6,175,000 gallons per year. [District Rule 2201]

N-2321-315-5, '-316-5, '-317-5, '-318-5, '-319-5, and '-320-5

- The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201]
- The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201]
- When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694]
- When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694]
- The ethanol content of wine or spirits stored in this tank shall not exceed 15 percent by volume. [District Rule 2201]
- When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 26,000 gallons on any given day. [District Rule 2201]
- Combined maximum spirits storage throughput for permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319 and N-2321-320 calculated on a rolling 12-month basis, shall not exceed 8,381,333 gallons per year. [District Rule 2201]

In addition, the following conditions will be carried over to ATCs N-2321-279-5, '-280-7, '-281-5, '-282-7, '-315-5, '-316-5, '-317-5, '-318-5, '-319-5, and '-320-5 to ensure continued compliance

- 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]
- When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201]
- Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201]
- Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201]
- Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201]

N-2321-899-3

- The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 12,000 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]
- This tank shall be used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201]
- The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201]
- The maximum wine or spirits storage throughput in this tank shall not exceed 12,000 gallons on any given day. [District Rule 2201]

- The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 4,380,000 gallons of spirits throughput per year. [District Rule 2201]

N-2321-904-3

- The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 12,000 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]
- This tank shall be used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201]
- The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201]
- The maximum wine or spirits storage throughput in this tank shall not exceed 12,000 gallons on any given day. [District Rule 2201]
- The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 1,677,308 gallons of spirits throughput per year. [District Rule 2201]

In addition, the following conditions will be carried over to ATCs N-2321-899-3 and N-2321-904-3 to ensure continued compliance.

- 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 weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201]
- The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694]

- The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 660,000 gallons of wine throughput per year. [District Rule 2201]

N-2321-900-3, '-901-3, '-902-3, and '-903-3

- The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 6,000 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]
- This tank shall be used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201]
- The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201]
- The maximum wine or spirits storage throughput in this tank shall not exceed 6,000 gallons on any given day. [District Rule 2201]
- The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 838,654 gallons of spirits throughput per year. [District Rule 2201]

In addition, the following conditions will be carried over to ATCs N-2321-900-3, N-2321-901-3, N-2321-902-3, and N-2321-903-3 to ensure continued compliance

- 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 weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201]
- 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 Rule 4694]

- The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 330,000 gallons of wine throughput per year. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

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

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

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

N-2321-279-5, '-280-7, '-281-5, and '-282-7

- When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201]
- When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201]
- Records of combined annual amount of spirits stored in permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 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 and 2201]

In addition, the following conditions will be carried over to ATCs N-2321-279-5, '-280-7, '-281-5, and '-282-7 to ensure continued compliance

- When this tank is used for wine storage, 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 of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201]
- Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201]

N-2321-315-5, '-316-5, '-317-5, '-318-5, '-319-5, and '-320-5

- When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201]
- When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201]
- Records of combined annual amount of spirits stored in permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319, and N-2321-320 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 and 2201]

In addition, the following conditions will be carried over to ATCs N-2321-315-5, '-316-5, '-317-5, '-318-5, '-319-5, and '-320-5 to ensure continued compliance.

- When this tank is used for wine storage, 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 of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201]
- {4659} The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201]

N-2321-899-3 and ‘-904-3

- The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201]
- 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201]
- The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201]

In addition, the following conditions will be carried over to ATCs N-2321-899-3 and N-2321-904-3 to ensure continued compliance

- 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]
- If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201]
- 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 and 2201]

N-2321-900-3, ‘-901-3, ‘-902-3, ‘-903-3

- The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201]
- 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201]

- The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201]

In addition, the following conditions will be carried over to ATCs N-2321-900-3, '-901-3, '-902-3, and '-903-3 to ensure continued compliance.

- 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]
- If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201]
- 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 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 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 major source for VOC and this project

constitutes a Federal Major Modification, therefore this requirement is applicable. CBUS Ops, Inc. (dba Woodbridge Winery)'s compliance certification is included in Appendix G.

H. Alternate Siting Analysis

The current project occurs at an existing facility. The applicant proposes to modify existing wine storage tanks.

Since the project involves various existing tanks at the winery, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or reinstallation of the tanks that are already at the facility, 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."

Minor permit modifications are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act. The emissions increase from this project exceeds the significance thresholds specified in Rule 2201 and is therefore a Title I modification. As a result, the proposed project constitutes a Significant Modification to the Title V Permit.

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 involves the installation of a new emission unit that is subject to an NSPS requirement, 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.

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 shall not implement the changes requested until the final permit is issued.

The following conditions will be included on the ATCs 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 spirits storage tanks.

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 spirits storage tanks.

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 and based on past inspections of similar emissions units, visible emissions are not expected to exceed 1 or 20% opacity. Therefore, compliance with this rule is expected.

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.

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.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification of an existing source shall not result in an increase in cancer risk greater than the District's significance level (20 in a million) and shall not result in acute and/or chronic risk indices greater than 1.

Ethanol (VOC) emitted from the spirits storage tanks is not a hazardous air pollutant (HAP) pursuant to section 44321 of the California Health and Safety Code. Therefore, a health risk assessment is not necessary and 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 is applicable 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 will be used for the storage of spirits. Therefore, the requirements of this rule are not applicable to any of the wine or spirits storage tanks in 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 emissions sources. This rule is applicable to all tanks wine fermentation and storage tanks with an internal volume equal to or greater than 5,000 gallons.

Pursuant to Section 3.35 of this rule, the definition of wine is the liquid product obtained from fermented must. Spirits do not meet the definition of wine; therefore, the proposed spirits storage operation is not subject to this rule. However, as discussed above in section VII.A, the winery tanks in this project are also used for wine storage and/or wine fermentation operations. Therefore, the following conditions will be carried over to ATCs to ensure continued compliance.

N-2321-279-5, '-280-7, '-281-5, '-282-7, '-315-5, '-316-5, '-317-5, '-318-5, '-319-5 and '-320-5

- For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
- When this tank is used for wine storage, 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]

N-2321-899-3, '-900-3, '-901-3, '-902-3, '-903-3, and '-904-3

- 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 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]

All permits modified in this project

- The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694]

Rule 4695 Brandy Aging and Wine Aging Operations

The purpose of this rule is to limit Volatile Organic Compounds (VOC) emissions from brandy aging and wine aging operations. This rule is applicable to brandy aging and wine aging operations.

The tanks associated with this project are not used for aging. Furthermore, pursuant to Section 4.2, the requirements of this rule shall not apply to wine storage tanks that are subject to Rule 4694 (Wine Fermentation and Storage Tanks), Section 5.2. Because all the tanks in this project are subject to Rule 4694, the requirements of this rule are not applicable and no further discussion is required.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. 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 Responsible Agency

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 San Joaquin (County) is the public agency having principal responsibility for approving the Project. As such, the County served as the Lead Agency for the Project. The County determined the project to be exempt from CEQA according to CEQA Guidelines Categorical Exemption §15303, Class 3 (New construction or conversion of small structures), and Section 15311, Class 11 (Accessory structures). Consistent with CEQA Guidelines §15062 a Notice of Exemption was prepared and adopted by the County.

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).

The District's engineering evaluation of the project (this document) demonstrates that compliance with District rules and permit conditions would reduce Stationary Source emissions from the project to levels below the District's thresholds of significance for criteria pollutants. Thus, the District concludes that through a combination of project design elements and permit conditions, project specific stationary source emissions will be reduced to less than significant levels. 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 Public Noticing period and 45-day EPA Comment period, issue ATCs N-2321-279-5, '-280-7, '-281-5, '-282-7, '-315-5, '-316-5, '-317-5, '-318-5, '-319-5, '-320-5, '-899-3, '-900-3, '-901-3, '-902-3, '-903-3, and '-904-3 subject to the permit conditions on the attached draft ATC in Appendix A.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-2321-279-5	3020-05-C	40,697 gallon tank	\$165
N-2321-280-7	3020-05-C	40,697 gallon tank	\$165
N-2321-281-5	3020-05-C	40,697 gallon tank	\$165
N-2321-282-7	3020-05-C	40,697 gallon tank	\$165
N-2321-315-5	3020-05-C	25,968 gallon tank	\$165
N-2321-316-5	3020-05-C	25,968 gallon tank	\$165
N-2321-317-5	3020-05-C	25,968 gallon tank	\$165
N-2321-318-5	3020-05-C	25,968 gallon tank	\$165
N-2321-319-5	3020-05-C	25,968 gallon tank	\$165
N-2321-320-5	3020-05-C	25,968 gallon tank	\$165
N-2321-899-3	3020-05-B	12,000 gallon tank	\$113
N-2321-900-3	3020-05-B	6,000 gallon tank	\$113
N-2321-901-3	3020-05-B	6,000 gallon tank	\$113
N-2321-902-3	3020-05-B	6,000 gallon tank	\$113
N-2321-903-3	3020-05-B	6,000 gallon tank	\$113
N-2321-904-3	3020-05-B	12,000 gallon tank	\$113

Appendices

- A: Draft ATCs
- B: Current PTOs
- C: BACT Guideline
- D: BACT Analysis
- E: Quarterly Net Emissions Change
- F: ERC Surplus Analyses
- G: Compliance Certification
- H: ERC Withdrawal Calculations

APPENDIX A

Draft ATCs

*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-279-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 761 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-280, N-2321-281, AND N-2321-282, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-279-5 : Mar 28 2022 9:52AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 31,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 calculated on a rolling 12-month basis, shall not exceed 6,175,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

DRAFT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-280-7

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 762 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-279, N-2321-281, AND N-2321-282, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

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 Authority to Construct (ATC) permit N-2321-280-5 shall be cancelled and replaced with this permit. [District Rule 2201]
4. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-280-7 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
6. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. 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
11. The ethanol content of wine or spirits stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
13. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 31,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined maximum spirits storage throughput for permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 calculated on a rolling 12-month basis, shall not exceed 6,175,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
18. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

19. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
20. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
21. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
22. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. Records of combined annual amount of spirits stored in permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
25. 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 and 2201] Federally Enforceable Through Title V Permit

DRAFT

*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-281-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 763 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-279, N-2321-280, AND N-2321-282, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-281-5 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 31,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 calculated on a rolling 12-month basis, shall not exceed 6,175,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-282-7

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 764 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.: ALLOW TANK TO STORE UP TO 6,175,000 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-279, N-2321-280, AND N-2321-281, WITH A MAXIMUM ETHANOL CONTENT OF 20% BY VOLUME

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 Authority to Construct (ATC) permit N-2321-282-5 shall be cancelled and replaced with this permit. [District Rule 2201]
4. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-282-7 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
6. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. 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
11. The ethanol content of wine or spirits stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
13. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 31,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined maximum spirits storage throughput for permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 calculated on a rolling 12-month basis, shall not exceed 6,175,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
18. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

19. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
20. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
21. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
22. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. Records of combined annual amount of spirits stored in permits N-2321-279, N-2321-280, N-2321-281, and N-2321-282 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
25. 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 and 2201] Federally Enforceable Through Title V Permit

DRAFT

*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-315-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 921 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-316, N-2321-317, N-2321-318, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-315-5 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 26,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319 and N-2321-320 calculated on a rolling 12-month basis, shall not exceed 8,381,333 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319, and N-2321-320 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

DRAFT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-316-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 922 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-317, N-2321-318, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-316-5 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 26,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319 and N-2321-320 calculated on a rolling 12-month basis, shall not exceed 8,381,333 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319, and N-2321-320 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-317-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 923 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-318, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-317-5 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 26,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319 and N-2321-320 calculated on a rolling 12-month basis, shall not exceed 8,381,333 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319, and N-2321-320 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

DRAFT

*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

DRAFT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-318-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 924 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-317, N-2321-319 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-318-5 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 26,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319 and N-2321-320 calculated on a rolling 12-month basis, shall not exceed 8,381,333 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319, and N-2321-320 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-319-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 925 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-317, N-2321-318 AND N-2321-320, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-319-5 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 26,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319 and N-2321-320 calculated on a rolling 12-month basis, shall not exceed 8,381,333 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319, and N-2321-320 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

DRAFT

*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-320-5

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 926 WITH PRESSURE/VACUUM VALVE AND INSULATION: ALLOW TANK TO STORE UP TO 8,381,333 GAL/YEAR OF SPIRITS, SHARED LIMIT WITH PERMITS N-2321-315, N-2321-316, N-2321-317, N-2321-318 AND N-2321-319, WITH A MAXIMUM ETHANOL CONTENT OF 15% BY VOLUME

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 - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificates Number C-1516-1 and Number S-5217-1 (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

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-320-5 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

5. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When used for wine or spirits storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. When this tank is used for wine or spirits storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The ethanol content of wine or spirits stored in this tank shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When this tank is used for spirits storage, the daily tank throughput, in gallons, shall not exceed 26,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Combined maximum spirits storage throughput for permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319 and N-2321-320 calculated on a rolling 12-month basis, shall not exceed 8,381,333 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When this tank is used for wine storage, 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] Federally Enforceable Through Title V Permit
18. When this tank is used for spirits storage, the operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. When this tank is used for wine or spirits storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694]
21. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records of combined annual amount of spirits stored in permits N-2321-315, N-2321-316, N-2321-317, N-2321-318, N-2321-319, and N-2321-320 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-899-3

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 12,000 GALLON NOMINAL STAINLESS STEEL BLENDING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 4,380,000 GAL/YEAR OF HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

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. Authority to Construct (ATC) N-2321-899-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]
4. The Authority to Construct (ATC) permit N-2321-899-1 shall be cancelled and replaced with this permit. [District Rule 2201]
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-899-3 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

6. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
7. The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 12,000 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 used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
12. The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine or spirits storage throughput in this tank shall not exceed 12,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 660,000 gallons of wine throughput per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 4,380,000 gallons of spirits throughput per year. [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 Rules 2201 and 4694] Federally Enforceable Through Title V Permit
18. The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rules 2201] Federally Enforceable Through Title V Permit
19. 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-900-3

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

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. Authority to Construct (ATC) N-2321-900-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]
4. The Authority to Construct (ATC) permit N-2321-900-1 shall be cancelled and replaced with this permit. [District Rule 2201]
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-900-3 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

6. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
7. The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 6,000 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 used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
12. The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine or spirits storage throughput in this tank shall not exceed 6,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 330,000 gallons of wine throughput per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 838,654 gallons of spirits throughput per year. [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 Rules 2201 and 4694] Federally Enforceable Through Title V Permit
18. The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-901-3

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #2 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

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. Authority to Construct (ATC) N-2321-901-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]
4. The Authority to Construct (ATC) permit N-2321-901-1 shall be cancelled and replaced with this permit. [District Rule 2201]
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-901-3 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

6. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
7. The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 6,000 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 used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
12. The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine or spirits storage throughput in this tank shall not exceed 6,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 330,000 gallons of wine throughput per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 838,654 gallons of spirits throughput per year. [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 Rules 2201 and 4694] Federally Enforceable Through Title V Permit
18. The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

DRAFT

PERMIT NO: N-2321-902-3

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #3 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

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. Authority to Construct (ATC) N-2321-902-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]
4. The Authority to Construct (ATC) permit N-2321-902-1 shall be cancelled and replaced with this permit. [District Rule 2201]
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-902-3 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

6. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
7. The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 6,000 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 used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
12. The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine or spirits storage throughput in this tank shall not exceed 6,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 330,000 gallons of wine throughput per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 838,654 gallons of spirits throughput per year. [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 Rules 2201 and 4694] Federally Enforceable Through Title V Permit
18. The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2321-903-3

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 6,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK #4 (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 838,654 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

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. Authority to Construct (ATC) N-2321-903-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]
4. The Authority to Construct (ATC) permit N-2321-903-1 shall be cancelled and replaced with this permit. [District Rule 2201]
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

N-2321-903-3 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

6. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
7. The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 6,000 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 used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
12. The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine or spirits storage throughput in this tank shall not exceed 6,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 330,000 gallons of wine throughput per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 838,654 gallons of spirits throughput per year. [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 Rules 2201 and 4694] Federally Enforceable Through Title V Permit
18. The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. 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 and 2201] Federally Enforceable Through Title V Permit

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*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

DRAFT

ISSUANCE DATE: DRAFT

PERMIT NO: N-2321-904-3

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

MAILING ADDRESS: PO BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE RD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 12,000 GALLON NOMINAL STAINLESS STEEL BOTTLING TANK (SELTZER PROCESS) WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD THROUGHPUT OF 1,677,308 GAL/YEAR OF BLENDED HIGH PROOF SPIRITS (HPS) SELTZER WITH A MAXIMUM ALLOWABLE ETHANOL CONTENT OF SPIRITS OF 15% BY VOLUME

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. Authority to Construct (ATC) N-2321-904-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201]
4. The Authority to Construct (ATC) permit N-2321-904-1 shall be cancelled and replaced with this permit. [District Rule 2201]
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,319 lb, 2nd quarter - 1,320 lb, 3rd quarter - 1,320 lb, and fourth quarter - 1,320 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

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Brian Clements, Director of Permit Services

N-2321-904-3 : Mar 28 2022 9:53AM -- PEREZK : Joint Inspection NOT Required

6. ERC Certificates Number C-1516-1 and Number S-5217-1 (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
7. The permittee shall submit to the District the nominal tank dimensions diameter in feet and height in feet for the proposed volume of 12,000 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 used exclusively for wine or spirits storage operations only and not for fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rule 4694] Federally Enforceable Through Title V Permit
12. The weighted annual average ethanol content of spirits stored in this tank, calculated on a rolling 12-month basis, shall not exceed 15 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The weighted annual average ethanol content of wine stored in this tank, calculated on a rolling 12-month basis, shall not exceed 8.1 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine or spirits storage throughput in this tank shall not exceed 12,000 gallons on any given day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum wine storage calculated on a rolling 12-month basis, shall not exceed 660,000 gallons of wine throughput per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The maximum spirits storage calculated on a rolling 12-month basis, shall not exceed 1,677,308 gallons of spirits throughput per year. [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 Rules 2201 and 4694] Federally Enforceable Through Title V Permit
18. The operator shall record, on a weekly basis, the total gallons of spirits contained in the tank and the maximum temperature of the stored spirits. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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 or spirits transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. The operator shall maintain records of the calculated rolling 12-month wine or spirits ethanol content and storage throughput rate (ethanol percentage by volume and gallons per rolling 12-month period, calculated monthly). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. If the throughput or ethanol content calculated for any rolling 12-month period exceeds the annual throughput or ethanol content limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the throughput or ethanol content limits for that rolling 12-month period will be deemed to have occurred so long as the calendar year throughput and ethanol content are below the annual throughput and ethanol content limitations. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. 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 and 2201] Federally Enforceable Through Title V Permit

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APPENDIX B

Current PTOs

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-279-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 761 WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-280-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 762 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit
15. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-281-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 763 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit
15. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-282-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

40,697 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 764 WITH PRESSURE/VACUUM VALVE AND INSULATION OR EQUIVALENT.

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit
15. Separate annual records of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-315-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 921 WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-316-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 922 WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-317-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 923 WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-318-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 924 WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-319-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 925 WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley

Air Pollution Control District

PERMIT UNIT: N-2321-320-4

EXPIRATION DATE: 08/31/2022

EQUIPMENT DESCRIPTION:

25,968 GALLON STAINLESS STEEL ENCLOSED TOP RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 926 WITH PRESSURE/VACUUM VALVE AND INSULATION

PERMIT UNIT REQUIREMENTS

1. The daily VOC emissions rate for fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
3. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
4. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694, 5.2.1] Federally Enforceable Through Title V Permit
5. 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, 5.2.2] Federally Enforceable Through Title V Permit
6. The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the daily tank throughput, in gallons, shall not exceed four times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rule 4694, 6.4.1]
9. When this tank is used for wine storage, 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, 6.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb/year, calculated on a twelve (12) month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = (Total Annual Red Wine Production - gallons) x (6.2 lb-VOC/1000 gallons) + (Total Annual White Wine Production - gallons) x (2.5 lb-VOC/1000 gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emissions factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific storage emissions factors based on the ethanol content of each batch. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall maintain the following records: red wine and white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury; the volume and the ethanol concentration of each wine movement; and the calculated 12 month rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
16. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

These terms and conditions are part of the Facility-wide Permit to Operate.

APPENDIX C

BACT Guideline

Best Available Control Technology (BACT) Guideline 5.4.15
Last Update: 5/6/2020

Distilled Spirits Storage Tank

Pollutant	Achieved in Practice or 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	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) Refrigerated Storage (70% control)	

***Tank 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.*

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.

APPENDIX D

BACT Analysis

Top-Down BACT Analysis

VOC

Step 1 – Identify all control technologies

The following options have been identified as potential controls for VOC emissions from distilled spirits storage tanks:

Achieved in Practice

- Insulation or Equivalent**, Pressure Vacuum Relief Valve (PVRV) set within 10% of the maximum allowable working pressure of the tank; “gas-tight” tank operation

Technologically Feasible

- Capture of VOCs and thermal or catalytic oxidation or equivalent (98% Control)
- Capture of VOCs and carbon adsorption or equivalent (95% Control)
- Capture of VOCs and absorption or equivalent (90% Control)
- Refrigerated Storage (70% Control)

**Tank 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.

Step 2 – Eliminate Technologically Infeasible Options

All of the control technologies listed in Step 1 are technologically feasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

- 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) Refrigerated Storage (70% Control)
- 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

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 \$22,600 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 (CIP) system are based on information from the 2005 Eichleay Study. The 2005 Eichleay study was used in development of District Rule 4694 Wine Fermentation and Storage Tanks and includes substantial information on the costs and details of the potential application of VOC controls to wineries and addresses many of the technical issues of the general site specific factors for wineries.
- The District performed a cost survey of stainless steel ducting/piping and found that the values stated in the Eichleay report including the cost of inflation (applied as stated below) were less expensive; therefore, as a conservative estimate, the District will use the cost of ducting/piping from the Eichleay report which will include ducting, fittings, bolt up, handle, and install.
- Eichleay's cost estimate for ducting included the duct, fittings, bolt up, handle and install; therefore, the District did not allow the additional costs for foundations & supports, handling & erection, electrical, piping or painting, as allowed by the EPA Cost Manual.
- The collection system consists of stainless steel place ductwork (stainless steel is required due to food grade product status) with isolation valving, connecting the tanks to a common manifold system which ducts the combined vent to the common control device. The cost of dampers and isolation valving, installed in the ductwork, will be included in the cost estimate.
- The ducting/piping costs quoted in the Eichleay study are from June 2005 and must be adjusted to reflect 2022 prices. An overall inflation amount of 44.55% which was taken from the United States Department of Labor, Bureau of Labor Statistics, Consumer Price Index (CPI) Inflation Calculator and applied to the ducting/piping costs to determine the current 2022 prices: 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 Acampo, CA, which has a current sales tax rate of 7.75%. 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 3.8125% (7.75% - 3.9375%).
- One of the major concerns of a manifold duct system is microorganisms spoiling the product, and transferring from one tank to another. It is necessary to design into the system a positive disconnect of the ducting system when the tanks are not being filled. There are a number of ways this can be done. In this case, an automatic butterfly valve with a physical spool to disconnect the tank from the duct will be utilized.
- 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.

Capital Cost of Ductwork

The tanks in this project are located very close to the rest of the tanks at the facility, as a conservative estimate, and only the small size pipe, 6" diameter pipe, will need to be used. The ductwork cost for the tanks, assuming a duct runs over the top of each tank, is summarized below:

N-2321-279 through '-282

- Connection from 40,697 gallon tank to 40,697 gallon tank:
 $[(13 \text{ feet tank diameter} \div 2) + 5 \text{ feet between tanks} + (13 \text{ feet tank diameter} \div 2)] \times \$62.17/\text{foot}$
 $= \$1,119 / \text{connection} \times 3 \text{ connections} = \$3,357$
- Connection from 40,697 gallon tank to emission control unit: $25 \text{ feet} \times \$62.17/\text{foot} = \$1,554$

N-2321-315 through '-320

- Connection from 25,968 gallon tank to 25,968 gallon tank:
 $[(12 \text{ feet tank diameter} \div 2) + 5 \text{ feet between tanks} + (12 \text{ feet tank diameter} \div 2)] \times \$62.17/\text{foot}$
 $= \$1,057 / \text{connection} \times 5 \text{ connections} = \$5,285$
- Connection from 25,968 gallon tank to emission control unit: $25 \text{ feet} \times \$62.17/\text{foot} = \$1,554$

N-2321-899 and '-904

- Connection from 12,000 gallon tank to 12,000 gallon tank:
 $[(10 \text{ feet tank diameter} \div 2) + 5 \text{ feet between tanks} + (10 \text{ feet tank diameter} \div 2)] \times \$62.17/\text{foot}$
 $= \$933$
- Connection from 12,000 gallon tank to emission control unit: $25 \text{ feet} \times \$62.17/\text{foot} = \$1,554$

All tanks

- Ducting Isolation Components for tank:
 - o Unit installed cost for 6 inch butterfly valve: $\$2,125/\text{valve} \times 12 \text{ tanks} = \$25,500$
 - o Unit installed cost one foot removable spool: $\$500/\text{tank} \times 12 \text{ tanks} = \$6,000$
- Ducting support allowance:
 - o Ducting support allowance is $\$4,000/\text{tank}$: $\$4,000/\text{tank} \times 12 \text{ tanks} = \$48,000$

Total Ductwork Capital cost = $(\$3,357 + \$5,285 + \$933) + \$1,554 \times 3 + \$25,500 + \$6,000$
 $+ \$48,000$
= \$93,737

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

Capital Cost of Ductwork for Wine Storage Tanks	
Cost Description	Cost (\$)
Combined Duct Estimate for all Tank Groups	\$93,737
Inflation adjusted duct cost (June 2005 dollars to July 2020 dollars) ⁴	\$135,497
The following cost data is taken from EPA Control Cost Manual, Seventh Edition (EPA/452/B-02-001).	
Direct Costs	
Base Equipment Costs (Ductwork) See Above	\$135,497
Instrumentation (not required)	-
Sales Tax - 3.8125% of base equipment	\$5,165
Freight - 5% of base equipment	\$6,775
Purchased equipment cost (PEC)	\$147,438
Foundations & supports 8% (allowance already included in Eichleay cost estimate)	-
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	\$1,474
Direct Installation Costs (DIC)	\$1,474
Total Direct Costs (DC) (PEC + DIC)	\$148,912
Indirect Costs	
Engineering - 10% of PEC	\$14,734
Construction and field expenses - 5% of PEC	\$7,372
Contractor Fees - 10% of PEC	\$14,734
Start-up - 2% of PEC	\$2,949
Performance Test - 1% of PEC	\$1,474
Total Indirect Costs (IC)	\$41,283
Subtotal Capital Investment (SCI) (DC + IC)	\$190,194
Contingencies - 15% of SCI	\$28,529
Total Capital Investment (TCI) (SCI + Contingency)	\$218,724

⁴ https://www.bls.gov/data/inflation_calculator.htm

Annualized Capital Investment = Present value of the control equipment x Amortization Factor

For the capital cost, the equivalent annual cost is calculated as shown below:

$$A = P \frac{i(1+i)^n}{(1+i)^n - 1}$$

Where,

- A = Equivalent Annual Control Equipment Capital Cost
- P = Present Value of the control Equipment, including installation cost
- I = Interest Rate (4%)
- N = Equipment Life (10 years)

Therefore, A = **\$26,967/year**

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, Seventh Edition (January 2021), Section 3.2: VOC Destruction Controls, Chapter 2: Incinerators (November 2017), Table 2.12 - Annual Costs for Thermal and Catalytic Oxidizers Example Problem⁵. 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	\$26.70/hr x 0.5 hr/shift x 2 shift/day x 365 days/year	\$9,746
Supervisor	15% of operator		\$1,462
Maintenance			
Labor	0.5 hr/shift	\$27.25/hr x 0.5 hr/shift x 2 shift/day x 365 days/year	\$9,946
Maintenance	100% of labor		\$9,946
Utility			
Natural Gas	not included		\$0
Electricity	not included		\$0
Total DAC			\$31,100
Indirect Annual Cost (IAC)			

⁵ https://www.epa.gov/sites/default/files/2017-12/documents/oxidizersincinerators_chapter2_7theditionfinal.pdf

Overhead	60% of Labor Cost	0.6 x (\$9,746 + \$1,462 + \$9,946 + \$9,946)	\$18,660
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$33,660
Annual Operating Cost (DAC + IAC)			\$64,760

Total Annual Cost

Total Annual Cost = Ductwork + Annual Operating and Maintenance
 = \$26,967 + \$64,760
 = \$91,727

Emission Reductions

Annual Emission Reduction = Uncontrolled Emissions x 0.98
 = 3,060 lb/yr x 0.98
 = 2,999 lb/yr = 1.50 tons/yr

Cost Effectiveness

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

Cost Effectiveness = \$91,727/yr ÷ 1.50 tons/yr
 = \$61,176/ton

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 \$22,600/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, Seventh Edition (January 2021), Section 3.1: VOC Recapture Controls, Chapter 1: Carbon Adsorbers (October 2018)⁶. 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	

⁶ https://www.epa.gov/sites/default/files/2018-10/documents/final_carbonadsorberschapter_7thedition.pdf

Operator	0.5 hr/shift	\$27.48/hr x 0.5 hr/shift x 3 shift/day x 360 days/year	\$14,839
Supervisor	15% of operator		\$2,226
Maintenance			
Labor	0.5 hr/shift	\$27.48/hr x 0.5 hr/shift x 3 shift/day x 360 days/year x Wage Rate (110%)	\$16,323
Maintenance	100% of labor		\$16,323
Utility			
Electricity	not included		-
Total DAC			\$49,711
Indirect Annual Cost (IAC)			
Overhead	60% of Labor Cost	0.6 x (\$14,839 + \$2,226 + \$16,323 + \$16,323)	\$29,827
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$44,827
Annual Operating Cost (DAC + IAC)			\$94,538

Total Annual Cost

$$\begin{aligned}
 \text{Total Annual Cost} &= \text{Ductwork} + \text{Annual Operating and Maintenance} \\
 &= \$26,967 + \$94,538 \\
 &= \$121,505
 \end{aligned}$$

Emission Reductions

$$\begin{aligned}
 \text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.95 \\
 &= 3,060 \text{ lb/yr} \times 0.95 \\
 &= 2,907 \text{ lb/yr} = 1.45 \text{ tons/yr}
 \end{aligned}$$

Cost Effectiveness

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

$$\begin{aligned}
 \text{Cost Effectiveness} &= \$121,505/\text{yr} \div 1.45 \text{ tons/yr} \\
 &= \$83,595/\text{ton}
 \end{aligned}$$

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 \$22,600/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 or Equivalent (90% collection & control):

Scrubber Annual Operating and Maintenance Costs⁷			
Direct Annual Cost (DAC)			
Operating Labor			
Operator	0.5 hr/shift	\$26.61/hr x 0.5 hr/shift x shift/8 hr x 8,000 hr/year	\$13,305
Supervisor	15% of operator		\$1,996
Maintenance			
Labor	0.5 hr/shift	\$29.27/hr x 0.5 hr/shift x shift/8 hr x 8,000 hr/year	\$14,635
Maintenance	100% of labor		\$14,635
Utility			
Electricity	not included		-
Total DAC			\$44,571
Indirect Annual Cost (IAC)			
Overhead	60% of Labor Cost	0.6 x (\$6,753 + \$18 + \$6,753 + \$6,753)	\$26,743
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$39,743
Annual Operating Cost (DAC + IAC)			\$84,314

Total Annual Cost

$$\begin{aligned}
 \text{Total Annual Cost} &= \text{Ductwork} + \text{Annual Operating and Maintenance} \\
 &= \$26,967 + \$84,314 \\
 &= \$111,281
 \end{aligned}$$

Emission Reductions

$$\begin{aligned}
 \text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.90 \\
 &= 3,060 \text{ lb/yr} \times 0.90 \\
 &= 2,754 \text{ lb/yr} = 1.38 \text{ tons/yr}
 \end{aligned}$$

Cost Effectiveness

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

$$\begin{aligned}
 \text{Cost Effectiveness} &= \$111,281/\text{yr} \div 1.38 \text{ tons/yr} \\
 &= \$80,814/\text{ton}
 \end{aligned}$$

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 \$22,600/ton-VOC. Therefore this option is not cost-effective and will not be considered for this project.

⁷ https://www.epa.gov/sites/default/files/2021-05/documents/wet_and_dry_scrubbers_section_5_chapter_1_control_cost_manual_7th_edition.pdf

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

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, Seventh Edition (January 2021), Section 3.1: VOC Recapture Controls, Chapter 2: Refrigerated Condensers (November 2017)⁸. 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.

Condenser Annual Operating and Maintenance Costs			
Direct Annual Cost (DAC)			
Operating Labor			
Operator	0.5 hr/shift	\$23.63/hr x 0.5 hr/shift x shift/8 hr x 2,080 hr/year	\$3,072
Supervisor	15% of operator		\$461
Maintenance			
Labor	0.5 hr/shift	\$24.25/hr x 0.5 hr/shift x shift/8 hr x 2,080 hr/year	\$3,153
Maintenance	100% of labor		\$3,153
Utility			
Electricity	not included		-
Total DAC			\$9,839
Indirect Annual Cost (IAC)			
Overhead	60% of Labor Cost	0.6 x (\$3,072 + \$461 + \$3,153 + \$3,153)	\$5,903
Annual Source Test	One representative test/year @ \$15,000		\$15,000
Total IAC			\$20,903
Annual Operating Cost (DAC + IAC)			\$30,742

Total Annual Cost

$$\begin{aligned}
 \text{Total Annual Cost} &= \text{Ductwork} + \text{Annual Operating and Maintenance} \\
 &= \$26,967 + \$30,742 \\
 &= \$57,709
 \end{aligned}$$

Emission Reductions

$$\begin{aligned}
 \text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.70 \\
 &= 3,060 \text{ lb/yr} \times 0.70 \\
 &= 2,142 \text{ lb/yr} = 1.07 \text{ tons/yr}
 \end{aligned}$$

Cost Effectiveness

⁸ https://www.epa.gov/sites/default/files/2017-12/documents/refrigeratedcondenserschapter_7thedition_final.pdf

Cost Effectiveness = Total Annual Cost ÷ Annual Emission Reductions

$$\begin{aligned}\text{Cost Effectiveness} &= \$57,709/\text{yr} \div 1.07 \text{ tons/yr} \\ &= \$53,883/\text{ton}\end{aligned}$$

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 \$22,600/ton-VOC. Therefore this option is not cost-effective and will not be considered for this project.

Option 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:**

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 spirits storage tanks 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. Therefore, the BACT requirements for VOC emissions will be satisfied for this project.

APPENDIX E
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

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

QNEC = PE2 - PE1, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post-Project Potential to Emit for each emissions unit, lb/qtr.
- PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.1 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

$PE2_{quarterly} = PE2_{annual} \div 4 \text{ quarters/year}$

$PE1_{quarterly} = PE1_{annual} \div 4 \text{ quarters/year}$

N-2321-279-5, ‘-280-7, ‘-281-5, and ‘-282-7

Because these 4 permits share a combined annual throughput of high proof spirits, the annual PE2 will be divided equally between the permit units. For each unit:

$PE2_{annual} = PE2_{combined} \div 4 \text{ tanks}$
 $= 270.25 \text{ lb/year}$

$PE2_{quarterly} = 67.5 \text{ lb/qtr}$

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
VOC	67.5	0	67.5

N-2321-315-5, ‘-316-5, ‘-317-5, ‘-318-5, ‘-319-5, and ‘-320-5

Because these 6 permits share a combined annual throughput of high proof spirits, the annual PE2 will be divided equally between the permit units. For each unit:

$PE2_{annual} = PE2_{combined} \div 6 \text{ tanks}$
 $= 191 \text{ lb/year}$

$PE2_{quarterly} = 47.75 \text{ lb/qtr}$

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
VOC	47.75	0	47.75

N-2321-899-3

PE2_{annual} = 600 lb/year

PE2_{quarterly} = 150 lb/qtr

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
VOC	150	0	150

N-2321-900-3, '-901-3, '-902-3, and '-903-3

PE2_{annual} = 115 lb/year

PE2_{quarterly} = 28.75 lb/qtr

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
VOC	28.75	0	28.75

N-2321-904-3

PE2_{annual} = 230 lb/year

PE2_{quarterly} = 57.5 lb/qtr

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
VOC	57.5	0	57.5

APPENDIX F

ERC Surplus Analyses

San Joaquin Valley Air Pollution Control District

Surplus ERC Analysis

Facility Name: CBUS Ops, Inc. (dba Woodbridge Winery) **Date:** March 1, 2022
Mailing Address: P.O. Box 1260 **Engineer:** Kevin Perez
 Woodbridge, CA 95258 **Lead Engineer:** James Harader
Contact Person: Paul Scherbak
Telephone: (707) 200-5222
ERC Certificate(s) #: C-1516-1
ERC Surplus Project #: C-1220511
ATC Project #: N-1213849

I. Proposal

CBUS Ops, Inc. (dba Woodbridge Winery) is proposing the use of the following Emission Reduction Credit (ERC) certificates to meet the federal offset requirements of District project N-1213849.

Proposed ERC Certificate(s)	
Certificate #	Criteria Pollutant
C-1516-1	VOC

The purpose of this analysis is to ensure that the emission reductions on this ERC certificate are surplus of all applicable Federal requirements; therefore, this analysis establishes the surplus value of the ERC certificate as of the date of this analysis. The current face value and surplus value of the ERC certificate evaluated in this analysis are summarized in the following table:

Criteria Pollutant: VOC

ERC Certificate C-1516-1				
Pollutant	1 st Qtr. (lb/qtr)	2 nd Qtr. (lb/qtr)	3 rd Qtr. (lb/qtr)	4 th Qtr. (lb/qtr)
Current Value	1,500	3,000	1,500	0
Surplus Value	1,500	3,000	1,500	0

II. Individual ERC Certificate Analysis

ERC Certificate C-1516-1

A. ERC Background

Criteria Pollutant: VOC

ERC Certificate C-1516-1 is a certificate that was split out from parent ERC Certificate C-1051-1. Original ERC Certificate C-1051-1 was issued to Martin Anderson on April 19, 2010 under project C-1074595. The ERC was generated from the shutdown of a polystyrene (EPS) foam box manufacturing facility, facility ID C-2929, which included the following permits that had associated VOC emissions.

C-2929-1-2:

EPS MOLD OPERATION SERVED BY 10.6 MMBTU/HR BOILER-OXIDIZER STEAM SYSTEM (B.O.S.S.) EQUIPPED WITH A LOW-NOX BURNER & FGR SYSTEM (COMMON TO C-2929-2)

The following table summarizes the values of the original parent certificate and the current value of the subject certificate proposed to be utilized as a part of the current District analysis:

ERC Certificate C-1516-1				
Pollutant	1st Qtr. (lb/qtr)	2nd Qtr. (lb/qtr)	3rd Qtr. (lb/qtr)	4th Qtr. (lb/qtr)
Original Value of Parent Certificate C-1051-1	8,699	12,348	6,585	90
Current Value of ERC Certificate C-1516-1	1,500	3,000	1,500	0

Please note: VOC emissions generated from the combustion of natural gas in the boiler/oxidizer system was accounted for in the VOC calculations for the expanded polystyrene foam processing operations.

B. Applicable Rules and Regulations at Time of Original Banking Project

Based on the application review for the original ERC banking project, the following rules and regulations were evaluated to determine the surplus value of actual emission reductions of VOCs generated by the reduction project.

1. District Rules

Rule 2301 - Emission Reduction Credit Banking (12/17/92)

The application review for the original ERC banking project demonstrated that the ERC credit complied with District Rule 2301 requirements at the time it was issued.

Rule 4301 Fuel Burning Equipment (12/17/92)

Rule 4306 Boilers, Steam Generators, and Process Heaters – Phase 3 (10/16/08) – N/A: no VOC emission limits

Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters (10/16/08) – N/A: no VOC emission limits

Rule 4682 Polystyrene, Polyethylene and Polypropylene Products Manufacturing (9/20/07)

The application review for the original ERC banking project demonstrated that the equipment had VOC limits that were below the limits in the Rules listed above. Therefore, the original VOC emission reductions were surplus of all applicable District Rule requirements.

2. Federal Rules and Regulations

There were no applicable federal rules or regulations identified that applied at the time of this original ERC banking action; therefore, no further discussion is required.

C. New or Modified Rule and Regulations Applicable to the Original Banking Project

All District and federal rules and regulations that have been adopted or amended since the date the original banking project was finalized will be evaluated below:

1. District Rules:

Rule 4306 Boilers, Steam Generators, and Process Heaters – Phase 3 (12/17/20)

Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (12/17/20)

Rules 4306, and 4320 do not contain any operational requirements or emission limits for VOC emissions. Therefore, the VOC emission reductions from the boilers continue to be surplus of the requirements of these rules.

Rule 4682 Polystyrene, Polyethylene and Polypropylene Product Manufacturing (12/15/11)

District Rule 4682 was amended by the District on December 15, 2011 and added to the District's SIP on September 20, 2012. Additionally, this Rule is applicable to the polystyrene manufacturing operation that was shutdown in the original ERC banking

project (unit C-2929-1). The amended version of the Rule includes an applicable limit of 2.4 lb-VOC/100 lb-processed.

Any adjustments to the surplus value of emission reductions from these units due to the requirements of this rule will be calculated in Section D of this analysis.

2. Federal Rules and Regulations:

40 CFR Part 60 Subpart DDD – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

This subpart applies to the manufacturing of basic polymers: polypropylene, polyethylene, polystyrene, and poly(ethylene terephthalate) (PET). Per the definition of process finishing in 60.561(c), “the shaping (such as fiber spinning, molding, or fabricating) or modification (such as fiber stretching and crimping) of the finished end product” is not including in this subpart. Therefore, the requirements of this subpart are not applicable to the original operation, and no further analysis is required.

D. Surplus at Time of Use Adjustments to ERC Quantities

As demonstrated in the section above, rules and regulations applicable to permit unit(s) in the original banking project have been adopted or amended since the date the original banking project was finalized. The emissions limits from these new/modified rules and regulations will be compared to the pre and post-project emission limits of each permit unit included in the original banking project to determine any discounting of the original surplus value of emission reductions due to the new/modified rule or regulation.

The amount of ERCs issued from each permit unit in the original banking project, the percentage of that amount which was discounted due to a new/modified rule or regulation, and the current surplus value of the amount of ERCs from each permit unit is calculated in the table(s) below:

Surplus Value Calculations for Permit Unit C-2929-1-2 Polystyrene Foam Box Manufacturing		
(A) Emission Reductions Contributing to ERC	27,722	lb/year
Pre-Project (EF1)	1.34	lb/100 lb processed
Post-Project (EF2)	0	lb/100 lb processed
Most Stringent Applicable Rule (EF _{Rule}): Rule 4682, Section 5.2.3 (lb/100 lb processed)	2.4	lb/100 lb processed
(B) Percent Discount*	0.0%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	27,722	lb/year

*If $EF_{Rule} \leq EF2$, Percent Discount = 100%, or
If $EF_{Rule} > EF1$, Percent Discount = 0%, otherwise,

$$(EF1 - EF_{Rule}) \times 100 \div (EF1 - EF2)$$

E. Surplus Value of ERC Certificate

As shown in the previous section, the surplus at time of use value of this ERC certificate will be adjusted. The current face value of the ERC certificate, the percent the current value is discounted by based on the surplus analysis in the previous section, and the current calculated surplus value of the ERC certificate is shown in the table below:

ERC Certificate C-1516-1 – Criteria Pollutant VOC					
		1 st Qtr. (lb/qtr)	2 nd Qtr. (lb/qtr)	3 rd Qtr. (lb/qtr)	4 th Qtr. (lb/qtr)
(A)	Current ERC Quantity	1,500	3,000	1,500	0
(B)	Percent Discount	0.0%	0.0%	0.0%	0.0%
(C) = (A) x [1 – (B)]	Surplus Value	1,500	3,000	1,500	0

San Joaquin Valley Air Pollution Control District

Surplus ERC Analysis

Facility Name: CBUS Ops, Inc. (dba Woodbridge Winery) **Date:** March 1, 2022
Mailing Address: P.O. Box 1260 **Engineer:** Kevin Perez
Woodbridge, CA 95258 **Lead Engineer:** James Harader
Contact Person: Paul Scherbak
Telephone: (707) 200-5222
ERC Certificate(s) #: S-5217-1
ERC Surplus Project #: C-1220365
ATC Project #: S-1213849

I. Proposal

CBUS Ops, Inc. (dba Woodbridge Winery) is proposing the use of the following Emission Reduction Credit (ERC) certificates to meet the federal offset requirements of District project N-1213849.

Proposed ERC Certificate(s)	
Certificate #	Criteria Pollutant
S-5217-1	VOC

Currently, S-5217-1 is owned by Element Markets LLC (S-7492) but CBUS Ops has demonstrated that they are in the process of purchasing the ERC Certificate from the current owner.

The purpose of this analysis is to ensure that the emission reductions on this ERC certificate are surplus of all applicable Federal requirements; therefore, this analysis establishes the surplus value of the ERC certificate as of the date of this analysis. The current face value and surplus value of the ERC certificate evaluated in this analysis are summarized in the following table:

Criteria Pollutant: VOC

ERC Certificate S-5217-1				
Pollutant	1 st Qtr. (lb/qtr)	2 nd Qtr. (lb/qtr)	3 rd Qtr. (lb/qtr)	4 th Qtr. (lb/qtr)
Current Value	339	339	339	340
Surplus Value	339	339	339	340

II. Individual ERC Certificate Analysis

ERC Certificate S-5217-1

A. ERC Background

Criteria Pollutant: VOC

ERC Certificate S-5217-1 is a certificate that was split out from parent ERC Certificate S-5120-1. These ERC certificates were derived from original ERC Certificate S-3493-1 that was issued to Agri-Cel Inc (Facility S-848) on April 4, 2011 under project S-1100008. ERC S-3493-1 was generated from the shutdown of an expanded polystyrene (EPS) box manufacturing facility. The facility shutdown included the following equipment:

- S-848-2-13 and S-848-6-9: polystyrene pre-expansion operations
- S-848-3-1 and S-848-7-8: polystyrene aging/storage operations
- S-848-4-10 and S-848-8-10: polystyrene aging/storage operations
- S-848-5-0: polystyrene grinding operation
- S-848-13-0: Outdoor Polystyrene storage operation
- S-848-9-2 and S-848-12-0: natural gas-fired boilers
- S-828-11-0: emergency standby IC engine

No ERCs were requested or issued for the following permits:

- S-848-5-0: polystyrene grinding operation
- S-828-11-0: emergency standby IC engine

The following table summarizes the values of the original parent certificate and the current value of the subject certificate proposed to be utilized as a part of the current District analysis:

ERC Certificate S-5217-1				
Pollutant	1 st Qtr. (lb/qtr)	2 nd Qtr. (lb/qtr)	3 rd Qtr. (lb/qtr)	4 th Qtr. (lb/qtr)
Original Value of Parent Certificate S-3493-1	71,653	86,926	80,406	9,672
Current Value of ERC Certificate S-5217-1	339	339	339	340

B. Applicable Rules and Regulations at Time of Original Banking Project

Based on the application review for the original ERC banking project, the following rules and regulations were evaluated to determine the surplus value of actual emission reductions of VOCs generated by the reduction project.

1. District Rules

Rule 2301 - Emission Reduction Credit Banking (12/17/92)

The application review for the original ERC banking project demonstrated that the ERC credit complied with District Rule 2301 requirements at the time it was issued.

Rule 4301 Fuel Burning Equipment (12/17/92)

Rule 4306 Boilers, Steam Generators, and Process Heaters – Phase 3 (10/16/08) – N/A: no VOC emission limits

Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters (10/16/08) – N/A: no VOC emission limits

Rule 4682 Polystyrene, Polyethylene and Polypropylene Products Manufacturing (9/20/07)

The application review for the original ERC banking project demonstrated that the polystyrene production lines and boiler emissions reduction calculations accounted for the limits in the Rules listed above. Therefore, the original VOC emission reductions were surplus of all applicable District Rule requirements.

2. Federal Rules and Regulations

There were no applicable federal rules or regulations identified that applied at the time of this original ERC banking action; therefore, no further discussion is required.

C. New or Modified Rule and Regulations Applicable to the Original Banking Project

All District and federal rules and regulations that have been adopted or amended since the date the original banking project was finalized will be evaluated below:

1. District Rules:

Rule 4306 Boilers, Steam Generators, and Process Heaters – Phase 3 (12/17/20)
Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (12/17/20)

Rules 4306 and 4320 do not contain any operational requirements or limits for VOC emissions. Therefore, the VOC emission reductions from the boilers continue to be surplus of the requirements of these rules.

Rule 4682 Polystyrene, Polyethylene and Polypropylene Product Manufacturing (12/15/11)

District Rule 4682 was amended by the District on December 15, 2011 and added to the District's SIP on September 20, 2012. Any adjustments to the surplus value of emission reductions from these units due to the requirements of this rule will be calculated in Section D of this analysis.

This Rule applies to the following permit units:

Line 1

- S-848-2-13: polystyrene pre-expansion operation (#1)
- S-848-3-1: polystyrene aging/storage operations
- S-848-4-10: polystyrene molding operation

Line 2

- S-848-6-9: polystyrene pre-expansion operation (#2)
- S-848-7-8: polystyrene aging/storage operation
- S-848-8-10: polystyrene molding operations

Outdoor Storage Operation

- S-848-13-0: Outdoor Polystyrene storage operation

2. Federal Rules and Regulations:

40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

This subpart is applicable to the boilers that were shut down in the original ERC banking project. However, this rule does not contain any operational requirements or emission limits for VOC emissions. Therefore, the VOC emission reductions are still surplus of the

requirements of this rule.

40 CFR Part 60 Subpart DDD – Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

This subpart applies to the manufacturing of basic polymers: polypropylene, polyethylene, polystyrene, and poly(ethylene terephthalate) (PET). Per the definition of process finishing in 60.561(c), “the shaping (such as fiber spinning, molding, or fabricating) or modification (such as fiber stretching and crimping) of the finished end product” is not included in this subpart. Therefore, the requirements of this subpart are not applicable to the original operation, and no further analysis is required.

40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

This subpart applies to boilers and process heaters located at a major source of Hazardous Air Pollutants (HAP). The facility was not a major source of HAP emissions as determined in Attachment 1.

40 CFR Part 63 Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

The boilers at the facility meet the definition of “gas-fired boiler” in the subpart as they were required to use natural gas or LPG as fuel. Pursuant to §63.11195(e), “gas-fired boilers” are not subject to this subpart; therefore, the requirements of this subpart are not applicable.

D. Surplus at Time of Use Adjustments to ERC Quantities

As demonstrated in the section above, rules and regulations applicable to permit units in the original banking project have been adopted or amended since the date the original banking project was finalized. The emissions limits from these new/modified rules and regulations will be compared to the pre and post-project emission limits of each permit unit included in the original banking project to determine any discounting of the original surplus value of emission reductions due to the new/modified rule or regulation.

Thermal Oxidizer Fuel Combustion (listed on permit S-848-2):

VOC emission reductions were associated with the natural gas combusted by the thermal oxidizer serving as the emissions control device. There are no new or amended District or Federal Rules that would place limits on the VOC emissions from natural gas combusted by the thermal oxidizer. The AP-42 emissions factor of 0.0055 lb/MMBtu and fuel usage records of the unit were used to calculate VOC emissions resulting in the following annual emissions reductions:

VOC = 11 lb per year

There is 0% discount from these emissions.

Boiler S-848-9:

Rules 4306 and 4320 would have been applicable to the boiler in the original ERC banking project. However, these rules do not contain any operational requirements or emission limits for VOC. Therefore, the VOC emission reductions from the boiler continue to be surplus of the requirements of these rules. The permitted emissions factor of 0.0040 lb/MMBtu and fuel usage records of the unit were used to calculate emissions resulting in the following annual emissions:

VOC = 81 lb per year

There is 0% discount from these emissions.

Boiler S-848-12:

Rules 4306, and 4320 would have been applicable to the boiler in the original ERC banking project. However, these rules do not contain any operational requirements or emission limits for VOC emissions. Therefore, the VOC emission reductions from the boiler continue to be surplus of the requirements of these rules. The AP-42 emissions factor of 0.0055 lb/MMBtu and fuel usage records of the unit were used to calculate emissions resulting in the following annual emissions:

VOC = 168 lb per year

There is 0% discount from these emissions.

Expandable Polystyrene Operation Line 1 (S-848-2-13, S-848-3-11, and S-848-4-10) and Line 2 (S-848-6-9, S-848-7-8, and S-848-8-10):

Rule 4682:

Rule 4682, Section 5.2 lists multiple options to comply with VOC emissions requirements for manufacturing and processing of products composed of polystyrene. The original evaluation showed that the polystyrene permits met the requirements of Section 5.2 as shown below:

5.2.7 A control system that meets all of the following requirements shall be deemed as meeting the requirements of Section 5.2.6, unless the APCO determines that additional controls are required.

5.2.7.1 The beads used in manufacturing have an annual-average VOC content of less than 4.2% per weight; and

5.2.7.2 The manufacturing emissions (not including finished product storage emissions) are controlled with an overall capture and control efficiency of at least 93% by weight.

The original ERC issuance project stated that the average pentane content of EPS beads utilized = 4% by weight

The required 93% capture control efficiency was used to determine surplus emissions in the original banking project.

Rule 4682 Surplus Determination:

Emission factors associated with the EPS processing lines listed in original ERC evaluation were based on emissions factors of an uncontrolled source test and a 93% capture and control efficiency required by District Rule 4682 as summarized in the following table:

Process	Uncontrolled Emission factor (lb/Ton – lb/100 lb)	Source	Controlled Emission factor (lb-VOC/Ton-EPS)	Controlled Emission factor (lb-VOC/100-lb EPS)
Pre-Expansion	8.8	<i>Agri-Cel Inc. Source Test (April 2006)</i>	0.616	0.031
Ageing/Silo Storage	5.2		0.364	0.0182
Molding	7.6		0.532	0.0266
Total	21.6		1.512	0.076

The amount of ERCs issued from each permit unit in the original banking project, the percentage of that amount which was discounted due to a new/modified rule or regulation, and the current surplus value of the amount of ERCs from each permit unit is calculated in the table(s) below:

Surplus Value Calculations for Permit Unit (S-848-2-13, S-848-3-11, and S-848-4-10) Polystyrene Production Line 1		
(A) Emission Reductions Contributing to ERC	2,868	lb/year
Pre-Project (EF1)	0.076	lb/100 lb processed
Post-Project (EF2)	0.0	lb/100 lb processed
Most Stringent Applicable Rule (EF _{Rule}): Rule 4682, Section 5.2.3 (lb/100 lb processed)	2.4	lb/100 lb processed
(B) Percent Discount*	0.0%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	2,869	lb/year

*If EF_{Rule} ≤ EF2, Percent Discount = 100%, or
If EF_{Rule} > EF1, Percent Discount = 0%, otherwise,

$$(EF1 - EF_{Rule}) \times 100 \div (EF1 - EF2)$$

Surplus Value Calculations for Permit Unit (S-848-6-9, S-848-7-8, and S-848-8-10) Polystyrene Production Line 2		
(A) Emission Reductions Contributing to ERC	4,329	lb/year
Pre-Project (EF1)	0.076	lb/100 lb processed
Post-Project (EF2)	0.0	lb/100 lb processed
Most Stringent Applicable Rule (EF _{Rule}): Rule 4682, Section 5.2.3 (lb/100 lb processed)	2.4	lb/100 lb processed
(B) Percent Discount*	0.0%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	4,329	lb/year

*If $EF_{Rule} \leq EF2$, Percent Discount = 100%, or
 If $EF_{Rule} > EF1$, Percent Discount = 0%, otherwise,
 $(EF1 - EF_{Rule}) \times 100 \div (EF1 - EF2)$

Outside Storage (S-484-13-0):

EPS Bead pentane content was obtained from the bead manufacturer's information provided for each shipment (Lot) of EPS beads delivered to the Agri-Cel Facility. Storage (off gassing) emissions were calculated by taking the difference between the initial pentane content of the beads, and the fugitive pentane and pentane vented to thermal oxidizer during manufacturing. This is consistent with the District's assumption that 100% of the pentane remaining in the product is released during storage.

$$VOC = 241,945 \text{ lb per year}$$

There is 0% discount from these emissions.

Total Discount Percentage for ERC Certificate

The total percentage of ERC S-5217-1 discounted due to new and modified rules and regulations is summarized in the following tables.

Total Percent Discount Summary for ERC Certificate S-5217-1			
Permit(s)	Amount of ERCs Issued (lb/year)	Percent Discount	Surplus Value (lb/year)
S-848-(2,3,4) Line 1	2,869	0.0%	2,869
S-848-(6,7,8) Line 2	4,329	0.0%	4,329
Thermal Oxidizer**	11	0.0%	11
S-848-9-2	81	0.0%	81
S-848-12-0	168	0.0%	168
S-848-13-0	241,945	0.0%	241,945
Total	249,403	0.0%	249,403
Total Percent Discount*		0.0%	

* Total Percent Discount = [(Total Amount of ERCs Issued – Total Surplus Value) ÷ Total Amount of ERCs Issued] x 100

**Control device serving Permits Units 2, 3, 4, 6, 7, and 8 of Facility S-848.

E. Surplus Value of ERC Certificate

As shown in the previous section, the surplus at time of use value of this ERC certificate will be adjusted. The current face value of the ERC certificate, the percent the current value is discounted by based on the surplus analysis in the previous section, and the current calculated surplus value of the ERC certificate is shown in the table below:

ERC Certificate S-5217-1 – Criteria Pollutant VOC					
		1 st Qtr. (lb/qtr)	2 nd Qtr. (lb/qtr)	3 rd Qtr. (lb/qtr)	4 th Qtr. (lb/qtr)
(A)	Current ERC Quantity	339	339	339	340
(B)	Percent Discount	0.0%	0.0%	0.0%	0.0%
(C) = (A) x [1 – (B)]	Surplus Value	339	339	339	340

Attachment

1. Major Source of HAP Determination

ATTACHMENT 1
Major Source of HAP Determination

Emissions break down for Facility S-848

Pentane, a non-hazardous VOC, accounts for more than 99% of the facilities VOC emissions. No other pollutant previously emitted by the facility even comes close to the major source threshold of 20,000 pounds. Therefore, the facility was not a major source of HAP. The emission values were taken from the original banking project, S-1100008. Please see the following tables for a breakdown of the VOC emissions:

Facility Two Year Average Emissions (2005 and 2006)				
NOx (lb/yr)	VOC (lb/yr)	CO (lb/yr)	SOx (lb/yr)	PM10 (lb/yr)
711	276,285	277	150	400

Average Facility EPS Pentane Emissions for the years 2005 and 2006					
Facility EPS Production Operations	Average Process Rate	Adjusted Drop Point Process Emissions (AER)			Total Pentane Emissions (lb-VOC/yr)
	EPS (Tons/yr)	Pre-Expansion (lb-VOC)	Ageing (lb-VOC)	Molding (lb-VOC)	
Line 1	1,898	1,169	691	1,009	2,869
Line 2	2,863	1,764	1,042	1,523	4,329
Outdoor Uncontrolled Storage	4,761				268,828
Total	4,761				276,026

Fuel Burning Operations	Ave. Annual Heat (MMBtu/yr)	Emission Factor (lb-VOC/MMBtu)	Total VOC (lb/yr)
S-848-12 (10.5 MMBtu/hr boiler)	30,486	0.0055	168
S-848-9 (7.5 MMBtu/hr boiler)	20,205	0.0040	81
Thermal Oxidizer (serves Line 1 and 2)	1,971	0.0055	11

Source of VOC Emissions	VOC (lb/yr)
Pentane from EPS Production	276,026
Other Sources of VOC emissions	259
Total VOC Emissions	276,285

APPENDIX G

Compliance Certification



**Constellation
Brands**

February 22, 2022

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

Re: Compliance Statement for N-2321 Woodbridge Winery (Project #1213849)

Dear Mr. Pierce:

In accordance with District Rule 2201, Section 4.15.2, 'Additional Requirements for New Major Source and Federal Major Modifications', Woodbridge Winery (N-2321) is pleased to provide this compliance statement associated with the increase in high proof spirits throughput and storage under Project #1213849.

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

Woodbridge Winery (N-2321)
5950 East Woodbridge Rd.
Acampo, CA 95220

Mission Bell Winery (C-628)
12667 Road 24
Madera, CA 93637

Gonzales Winery (pending Title V)
800 South Alta Street
Gonzales, CA 93926

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

Please contact Paul Scherbak (707-200-5222) should you have any questions regarding this compliance statement.

Regards,

A handwritten signature in blue ink, appearing to read "Tony Sanfillipo", with a long horizontal flourish extending to the right.

Tony Sanfillipo, General Manager
Woodbridge Winery

APPENDIX H

ERC Withdrawal Calculations

VOC	1 st Quarter (lb)	2 nd Quarter (lb)	3 rd Quarter (lb)	4 th Quarter (lb)
ERC C-1516-1	1,291	2,791	1,080	0
Offsets Required (Includes distance offset ratio)	1,319	1,320	1,320	1,320
Remaining Offsets Required	28	0	240	1,320
Amount Remaining from ERC C-1516-1	0	1,471	0	0
ERC C-1516-1 Remaining- Transfer From 2 nd Quarter: 28 lb to Q1, 240 lb to Q3, and 1,203 lb to Q4	28	0	240	1,203
Offsets Required	28	0	240	1,320
Remaining Offsets Required after applying transferred quantities of remaining credits from ERC C- 1516-1	0	0	0	117
Amount Remaining from ERC C-1516-1	0	0	0	0
ERC S-5217-1	339	339	339	340
Offsets Required	0	0	0	117
Remaining Offsets Required	0	0	0	0
Amount Remaining from ERC S-5217-1	339	339	339	223
Credits reissued under ERC S-YYYY-1	339	339	339	223

*District Rule 2201, Section 4.13.8 allows VOC offsets from the 2nd quarter to be transferred to any period of the year.