

NOTICE OF INITIAL TITLE V PERMIT ISSUANCE FOR CONSTELLATION BRANDS U.S.
OPERATIONS, INC. FOR GONZALES WINERY

Pursuant to District Rule 218, the Monterey Bay Air Resources District solicits written comments to the preliminary decision to approve the issuance of the initial Title V Permit to Constellation Brands U.S. Operations, Inc. for Gonzales Winery (Gonzales Winery) for their existing winery operations located at 800 S. Alta Street in Gonzales.

The Gonzales Winery main operations include the fermentation, storage and aging of both red & white wine. In support of the winery operations the facility operates the following equipment: natural gas boilers, laboratory fume hood, and emergency internal combustion engines.

The Gonzales Winery facility at 800 S. Alta Street in Gonzales is considered a federal Major Source and subject to the Title V permitting program due to the potential to emit volatile organic compounds (VOCs). The Operating Permit includes conditions to ensure that all federal requirements are satisfied. The Gonzales Winery has submitted the initial Title V permit application for the facility. The Title V permit to be issued will contain all the applicable federal requirements. The approval of this project is being proposed because the facility has the capability of complying with all applicable federal requirements.

The proposed permit will be forwarded to the US EPA for a 45-day review period. The District will not issue a permit to which EPA objects. The public may petition the US EPA, Region 9, Operating Permits Section, within 60 days after the US EPA 45-day review period to object the issuance of the final permit. This petition shall be based only on objections that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise the issue during that time period.

The Gonzales Winery's application and the District Evaluation Report of the initial Title V application are available for public inspection at the District office at 24580 Silver Cloud Court, Monterey, CA. A copy of the evaluation report is found on the District website at www.mbard.org.

The public has an opportunity to review and comment on the proposed Project. Under special circumstances, the District may hold a public hearing. Written comments must be submitted to the address below and be postmarked by Friday, June 24, 2022.

Monterey Bay
Air Resources District
24580 Silver Cloud Court
Monterey, CA 93940
(831) 647-9411
ajimenez@mbard.org
Attention: Armando Jimenez

**MONTEREY AIR RESOURCES DISTRICT
TITLE V OPERATING PERMIT
STATEMENT OF BASIS**

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

Dated: March 2022

APPLICATION RECEIVED FROM:

Constellation Brands U.S. Operations, Inc. for Gonzales Winery
PO Box 789
Gonzales, CA 93926

PLANT SITE LOCATION:

800 South Alta Street
Gonzales, California

APPLICATION PROCESSED BY:

Armando Jimenez, Air Quality Engineer

Nature of Business: Wine Manufacturing

SIC Code: 2084 – Wines, Brandy, and Brandy Spirits

RESPONSIBLE OFFICIAL:

Name: Ms. Monica Belavic
Title: General Manager Central Coast
Wine Making Operations
Phone: (805) 550-7501

ALTERNATE RESPONSIBLE OFFICIAL:

Name: Mr. Yamil Sales
Title: Director of Cellar Operations
Phone: (831) 258-9225

FACILITY CONTACT PERSON:

Name: Joe Barner
Title: Environmental Health & Safety Manager
Phone: (559) 231-7117

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PROJECT DESCRIPTION

Pursuant to Rule 218 of the Monterey Bay Air Resources District (District) Rules and Regulations, the District intends to issue an initial Title V Operating Permit to Constellation Brands U.S. Operations, Inc. (Constellation) for their existing winery manufacturing operations at their Gonzales Winery located in Gonzales, California.

The Gonzales Winery facility at 800 S. Alta Street in Gonzales is considered a federal Major Source and subject to the Title V permitting program due to the potential to emit volatile organic compounds (VOCs). The Operating Permit includes conditions to ensure that all federal requirements are satisfied.

FACILITY DESCRIPTION

The Gonzales Winery main operations include the fermentation, storage and aging of both red & white wine. In support of the winery operations the facility operates the following equipment: natural gas boilers, laboratory fume hood, and emergency internal combustion engines.

EQUIPMENT DESCRIPTION

WINERY OPERATIONS

1. Wine Fermentation And Storage: Fermentation Tanks, Storage Tanks And Oak Barrels Used For The Fermentation And Storage Of Wine.
2. Oak Barrel Storage And Aging: Oak Barrels Used For the Aging And Storage Of Wine.
3. Cleaver-Brooks Boiler #1, With Cleaver-Brooks Gas Buner, With A Maximum Capacity Of 6.277 MMBtu/Hr. Natural Gas Fired Only.
4. Cleaver-Brooks Boiler #2, With Cleaver-Brooks Gas Buner, With A Maximum Capacity Of 6.277 MMBtu/Hr. Natural Gas Fired Only.
5. Kewanee Boiler #3, With Kewanee Gas Buner, With A Maximum Capacity Of 12.554 MMBtu/Hr. Natural Gas Fired Only.
6. Parker Boiler #4, With Parker Gas Buner, With A Maximum Capacity Of 2.65 MMBtu/Hr. Natural Gas Fired Only.
7. LAARS Two-Stage Natural Gas Boiler, With A Maximum Capacity Of 3,999,840 Btu/Hr. Natural Gas Fired Only.
8. Ancillary Equipment

Distillation Equipment With Storage Tanks

Laboratory Equipment With Ventilation Systems

Emergency Internal Combustion Diesel Engine-Fire Pump

Emergency Internal Combustion Diesel Engine-Fire Pump

Emergency Internal Combustion Natural Gas Engine-Generator Set

APPLICABLE FEDERAL REQUIREMENTS

Applicable Requirement	Equipment Affected
Rule 200, Permits Required	Facility Wide
Rule 201, Sources Not Requiring Permits	Facility Wide
Rule 207, Review of New or Modified Sources	Facility Wide
Rule 214, Breakdown Condition	Facility Wide
Rule 218, Title V: Federal Operating Permits	Facility Wide
Rule 308, Title V: Federal Operating Permit Fees	Facility Wide
Rule 400, Visible Emissions	Facility Wide
Rule 403, Particulate Matter	Facility Wide
Rule 404, Sulfur Compounds and Nitrogen Oxides	Internal Combustion Engines & Natural Gas Fired-Boilers
Rule 412, Sulfur Content Fuels	Internal Combustion Engines & Natural Gas Fired-Boilers
Rule 416, Solvents	Facility Wide
Rule 426, Architectural Coatings	Facility Wide
40 CFR Part 60, Subpart A, New Source Performance Standards (NSPS), General Provisions	Facility Wide
40 CFR Part 60, Subpart Dc, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Boilers
40 CFR Part 60, Subpart IIII, NSPS For Stationary Compression Ignition Internal Combustion Engine	Ancillary Emergency Diesel-Powered Fire Pump
40 CFR Part 60, Subpart JJJJ, NSPS Stationary Spark Ignition Internal Combustion Engines	Ancillary Emergency Natural Gas-Powered Generator
40 CFR Part 63, Subpart ZZZZ, NESHAPS for Stationary Reciprocating Internal Combustion Engines	Ancillary Emergency Diesel-Powered Fire Pump
40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Boilers

40 CFR Part 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	Boilers
40 CFR Part 64, Compliance Assurance Monitoring	Facility Wide
40 CFR Part 68, Risk Management Planning	Facility Wide
40 CFR Part 82, Protection of Stratospheric Ozone	Facility Wide

COMPLIANCE DETERMINATION FOR APPLICABLE FEDERAL REQUIREMENTS

Rule 200 – Permits Required:

The purpose of this Rule is to identify when District permits are issued. The Rule requires any person who builds, erects, alters, or replaces any article, machine, equipment or other contrivance which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants to obtain a written Authority to Construct (ATC) and Permit to Operate (PTO). This facility has historically complied with the requirements of this rule and continued compliance is expected.

Rule 201 – Sources Not Requiring Permits:

The purpose of this Rule is to provide a list of source and equipment categories which are exempt from the requirements of District Rule 200, *Permits Required*, to obtain an ATC or PTO.

Rule 207 – Review of New or Modified Sources (as adopted on 4/20/11):

Rule 207 applies to all new stationary sources and all modifications to existing stationary sources, which after construction or modification, emit or have the potential to emit any affected pollutants.

The facility has been in operation prior to July 15, 1976, the adoption of the NSR Rule. The District began permitting fermentation operations in 1996 with the use of the EPA AP42 emission factors for fermentation. Then, on March 4, 2016, the District distributed Winery Emission Factor Guidance, which requires all future evaluations to be based upon the California Air Resources Board’s (CARB) 2005 emission factors of 6.2 lbs VOC/1000 gallons for red wine fermentation and 2.5 lbs VOC/1000 gallon for white wine fermentation¹. In addition, the District also adopted an emission factor for oak barrel storage/aging operations and began requiring permits for new and existing oak barrel storage/aging operations.

New equipment and equipment modifications have been permitted under the NSR process. The facility exceeds the BACT and Offset thresholds for volatile organic compounds (VOCs) of Rule 207. The District permits include a facility-wide permit limit for VOCs. Since the Offset analysis is done on calendar year basis, the facility-wide VOC emission limit is based on a calendar year basis.

This application is for the initial Title V Permit issuance and will be subject to the requirements of District

¹ *Winery Emission Factor Guidance*. Monterey Bay Air Resources District. March 4, 2016.
https://mbard.specialdistrict.org/files/9417a4944/Winery-Emission-Factor-Guidance_02012018-1.pdf.

Rule 218 Title V: Federal Operating Permits.

Rule 207 – Review of New or Modified Sources (as adopted on 2/15/17):

The purpose of this Rule is to provide for the review of new and modified stationary air pollution sources to meet the New Source Review requirements under the provisions of the California Clean Air Act. This Rule provides mechanisms by which Authorities to Construct may be granted to such sources without interfering with the attainment or maintenance of California ambient air quality standards. Each project subject to New Source Review shall undergo a review under the federal requirements contained within Rule 220 and Rule 221, and a parallel review under the requirements of this Rule and the most stringent applicable provisions shall apply.

Rule 207 applies to all new stationary sources and all modifications to existing stationary sources, which after construction or modification, emit or have the potential to emit any affected pollutants.

Note that while the District Board approved the revisions of Rule 207 in February 2017 and submitted to the California Air Resources Board (CARB), CARB has not approved the revisions to Rule 207. Thus, the District will review projects subject to NSR under the April 2011 and February 2017 versions of the Rule.

This application is for the initial Title V Permit issuance and will be subject to the requirements of District Rule 218 *Title V: Federal Operating Permits*.

Rule 214 – Breakdown Conditions:

This is the implementing regulation in which the District has established the criteria for reporting breakdowns. The requirements imposed by the SIP approved version of this rule will be included on this permit. The SIP approved version of this rule is that which was adopted on December 13, 1984.

Permit conditions are included on the permit to comply with the requirements of Rule 214.

Rule 218 – Title V: Federal Operating Permits:

This is the implementing regulation by which the District issues the federal Operating Permits. The facility is subject to the requirements of this rule.

Pursuant to Rule 218 Section 1.2, the requirements of this Rule applies to any facility that is a major source, acid rain source, solid waste incinerator that must comply with Section 129(e) of the Act, or any other sourced deemed to require a Federal Operating Permit (FOP) by US EPA. This facility is not an acid rain source, or a solid waste incinerator nor a facility deemed require to have FOP by US EPA. Per Rule 218 Section 2.18, a facility is a major source if it exceeds the following emission thresholds:

- 100 tons per year for regulated (criteria) pollutants
- 10 tons single Hazardous Air Pollutant (HAP) per year
- 25 tons per year of any combination of HAPs per year
- If facility subject by other criteria, then, 100,000 tons per year or more of carbon dioxide equivalent (CO₂e) and 100 tons per year of a regulated (criteria) pollutant

Facility-wide potential to emit (PTE):

The Gonzales Winery facility-wide potential to emit (PTE) emissions are shown in Table 1.

Table 1. Gonzales Winery potential to emit emissions.

Permit No.:	NO _x (ton/yr)	VOC (ton/yr)	CO (ton/yr)	SO _x (ton/yr)	PM (ton/yr)
Wine fermentation and storage		83.20			
Oak barrel storage/aging ¹		59.53			
Boiler #1	2.62	0.14	2.20	0.02	0.20
Boiler #2	2.62	0.14	2.20	0.02	0.20
Boiler #3	5.24	0.29	4.40	0.03	0.40
Boiler #4	1.11	0.06	0.93	0.01	0.08
Two-stage boiler	0.64	0.09	1.44	0.01	0.13
Emergency engine fire pump (196 HP) ²	1.51	0.14	0.47	0.10	0.08
Emergency engine fire pump (134 HP) ²	1.03	0.10	0.32	0.07	0.06
Distillation equipment with storage tanks		0.44			
Laboratory equipment with ventilation system		0.05			
Emergency engine generator set (103 HP) ²	0.01	0.01	0.05	0.00	0.00
Total:	14.78	144.19	12.01	0.26	1.15

¹ As noted in the Rule 207 analysis, the district started permitting the oak barrel storage/aging operations on March 4, 2016.

² Emergency engine annual emissions are based on 500 hours per year based on EPA's guidance for emergency engines.

Table 1 shows that the facility PTE for VOC exceeds Rule 207's major source threshold of 100 tons per year for VOCs.

Permit conditions are included on the permit to comply with the requirements of Rule 218.

Rule 308 – Title V: Federal Operating Permit Fees

The purpose of this Rule is to provide funding for the issuance and enforcement of Federal Operating Permits, which meet the requirements of Title V of the Federal Clean Air Act and amendments (the Act). The fees required pursuant to this Rule shall be in addition to fees for District permits to operate and other fees required by other District rules.

The provisions of this Rule shall apply to any facility that is required to apply for and maintain a Federal Operating Permit pursuant to Rule 218. Appropriate conditions will be included on the Title V permit to ensure compliance with the fee provisions contained in this rule.

Rule 400 – Visible Emissions

According to District Rule 400 Section 3.1, no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Rangeland 1, or equivalent 20% opacity. This requirement will be included as a permit condition.

Pursuant to Section 3.1, no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Rangeland 1, or equivalent 20% opacity.

Permit conditions will be included on the permit to ensure compliance with this rule.

Rule 403 – Particulate Matter

The purpose of this Rule is to provide particulate matter emission limits for sources operating within the District. The provisions of this Rule shall apply to any source discharging particulate matter while operating within the Air District.

Pursuant to Section 3.1, a person shall not discharge from any source whatsoever particulate matter in excess of 0.15 grains/ft³. Below is the analysis for each set of fuel fired equipment at the facility.

Stationary Internal Combustion Engines (emergency generator and pumps) – Section 1.3.1 exempts stationary internal combustion engines from meeting the requirements of this Rule.

Natural Gas Boilers (compliance shown for largest boiler, boiler #3, rated at 12.554 MMBtu/Hr) – Based on the boiler heat input of 12.554 MMBtu/Hr, PM emission rate of 0.09 lb/hr and digester gas Fd-Factor of 8,710 dscf/MMBtu, compliance with the PM limit of 0.15 grains/ft³ is shown as follows:

$$\text{Exhaust flow, } \frac{\text{dscf}}{\text{hr}} = \frac{12.554 \text{ MMBtu}}{\text{hr}} \times \frac{8,710, \text{dscf}}{\text{MMBtu}} \times \frac{20.9}{20.9 - 3} = \frac{127,671.37 \text{ dscf}}{\text{hr}}$$
$$\text{PM } \left(\frac{\text{grains}}{\text{dscf}} \right) = \frac{0.09 \text{ lb PM}}{\text{hr}} \times \frac{7,000 \text{ gr}}{\text{lb PM}} \times \frac{\text{hr}}{127,671.37 \text{ dscf}} = \frac{0.005 \text{ grains}}{\text{dscf}}$$

Permit conditions are included on the permit to ensure compliance with Rule 403.

Rule 404 – Sulfur Compounds and Nitrogen Oxides

The purpose of this Rule is to provide limits for the emissions of sulfur compounds, nitrogen oxides and nitrogen dioxide from sources within the District. The provisions of this Rule shall apply to sources of sulfur compounds, nitrogen oxides, and nitrogen dioxide subject to District Rule 200 *Permits Required*.

Section 3.1 prohibits any single emission unit from exceeding the following concentration or amount at the point of discharge to the atmosphere:

- Sulfur compounds, calculated as sulfur dioxide, 0.2% by volume (2,000 ppmv), and
- Nitrogen oxides, calculated as nitrogen dioxide (NO₂), 140 pounds per hour.
- Nitrogen oxides, calculated as nitrogen dioxide (NO₂), flue gas having a 225 ppm NO_x by volume at 3% O₂ concentration for equipment with heat input rate of 1-1/2 billion Btu per hour (gross).

Natural Gas Boilers (compliance shown for largest boiler, boiler #3, rated at 12.554 MMBtu/Hr)

- Compliance with the sulfur limit is based on the boiler's SO₂ emission rate of 0.007 lb/hr, heat input rating of 12.554 MMBtu/hr and exhaust flow rate of 127,671.37 dscf/hr. Compliance is shown as follows:

$$SO_2(ppm) = \frac{lbSO_2}{hr} \div \left(\frac{DSCFM, ft^3}{hr} \times \frac{MV_{SO_2}, lb}{lbmole} \times \frac{lbmole}{385ft^3} \right) \times 10^6$$
$$SO_2(ppm) = \frac{0.007 lb}{hr} \div \left(\frac{127,671.37 ft^3}{hr} \times \frac{64 lb}{lbmole} \times \frac{lbmole}{385ft^3} \right) \times 10^6 = 0.33 ppm$$

- The boiler has a NO_x emissions rate of 1.196 lb/hr, which is well below 140 lb/hr.
- The boiler's heat input rating is well below 1-1/2 billion Btu per hour.

Diesel Fired Emergency Water Pump

- Compliance with the 0.2% by volume (2,000 ppmv) limit for SO₂ for combustion of diesel in the emergency diesel engine is assumed while using California Air Resources Board (CARB) ultra-low sulfur diesel fuel which contains no more than 15 parts per million by weight of sulfur compounds.
- Compliance with the 140 lb/hr NO_x limit based upon the following emission calculation. The NO_x emissions from the larger Diesel Emergency Water Pump rated at 196 HP is based upon AP-42 factors (Table 3.3-1, dated 10/96), are 5.92 lbs NO_x/hr [(196 hp)(0.031lb/hp-hr) = 5.92 lbs NO_x/hr]. This calculated value is well below the 140 lb/hr limit contained in the rule. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 140 lb/hr NO_x limit for this equipment.
- The engine's heat input rating is well below 1-1/2 billion Btu per hour.

Natural Gas Emergency Generator Set

- Compliance with the 0.2% by volume (2,000 ppmv) limit for SO₂ for the engine is assured based on the SO₂ emissions of 0.0008 lb/hr and exhaust flow rate of 21,000 ft³/hr. See calculation below:

$$SO_2(ppm) = \frac{0.0008 lb}{hr} \div \left(\frac{21,000 ft^3}{hr} \times \frac{64 lb}{lbmole} \times \frac{lbmole}{385ft^3} \right) \times 10^6 = 0.229 ppm$$

- Nitrogen oxides, calculated as nitrogen dioxide (NO₂), 140 pounds per hour. The hourly NO_x emission rate for the engine is 0.02 lb/hr [(0.54 lb/day) ÷ (24 hr/day) = 0.02 lb/hr], which is well below the 140 lb/hr limit.

In addition, the unit was required to install a catalyst to comply with the BACT NSR Requirements of Rule 207. Since the unit met the BACT, the unit is not subject to the emission limits of Section 3.1, per Section 1.3.2.

Permit conditions will be included on the permit to ensure compliance with Rule 404.

Rule 412 – Sulfur Content of Fuels

The purpose of this Rule is to limit emissions of sulfur oxides from combustion sources within the District. The provisions of this Rule shall apply to all combustion sources operated within the Air District unless exempted pursuant to Section 1.3 of this Rule.

Pursuant to Part 3, no person shall burn within the District any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions, or any liquid fuel or solid fuel having a sulfur content in excess of 0.5 percent by weight. Use of PUC quality natural gas in the boilers and engine-generator set assures compliance with the sulfur content of this Rule. Use of CARB diesel fuel in the emergency diesel-fired fire pumps assure compliance with sulfur content of this Rule.

Permit conditions will be included on the permit to comply with the requirements of Rule 412.

Rule 416 – Solvents

The purpose of this Rule is to limit the emissions of volatile organic compounds (VOCs) that are used as solvents. The provisions of this Rule shall apply to any equipment or process that uses solvents, unless specifically exempted. This rule applies to the laboratory equipment with ventilation system at this facility. Subsection 3.2 limits the uncontrolled emissions from any equipment or permit unit using or applying any solvent to 40 pounds of VOCs per day. Historically, material usage records show that the facility VOC emissions are at 0.29 lb VOC per day well below the 40 pound per day limit of Section 3.2.

Permit conditions are included on the permit to comply with the requirements of Rule 416.

Rule 426 – Applications of Nonarchitectural Coatings

This rule is applicable to all applications of Nonarchitectural coatings and limits the VOC content of these coatings. The facility is in compliance with the requirements of this rule.

An appropriate condition will be included on the permit to ensure compliance with the requirements of this rule.

40 CFR Part 60, Subpart A – New Source Performance Standards, General Provisions

This facility is subject to the requirements of 60.7 (notification and record keeping), 60.11 (compliance with standards and maintenance requirements), and 60.13 (monitoring requirements) because the ancillary stationary emergency diesel engine described in Equipment Description 14 is subject to 40 CFR Part 60, Subpart III.

The District asserts that compliance with the conditions on the Title V permit shall be considered compliance with the monitoring, record keeping, and reporting requirements contained in 40 CFR Parts 60.7, 60.8, 60.11, and 60.13.

Permit conditions are included on the permit to comply with the requirements of this NSPS.

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

Pursuant to Section §60.40c, the requirements of this Subpart apply to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr (29 MW) or less, but greater than or equal to 10 MMBtu/hr (2.9 MW).

Only natural gas-fired boiler #3 has a heat input capacity 12.554 MMBtu/hr and is the only boiler with a rating greater or equal to 10 MMBtu/Hr. Thus, boiler #3 is subject to the requirements of this Subpart. However, no SO_x and PM requirements are imposed due to the fact that no heat input is provided by coal, oil, or wood.

No conditions pertaining to this Subpart will be included on the permit.

40 CFR Part 60, Subpart IIII – NSPS for Stationary Compression Ignition Internal Combustion Engines

The requirements of this subpart apply to stationary compression ignition (CI) internal combustion engines that commence construction after July 11, 2005. Both of the emergency diesel-powered fire pumps were installed in 1975 and are exempt from the requirements of this Subpart.

No conditions pertaining to this Subpart will be included on the permit.

40 CFR Part 63, Subpart A – National Emission Standard for Hazardous Air Pollutants - General Provisions

Pursuant to Section §63.1(b), the provisions of this part apply to the owner or operator of any stationary source that

- i. Emits or has the potential to emit any hazardous air pollutant (HAP) listed in or pursuant to section 112(b) of the ACT; and
- ii. Is subject to any standard, limitation, prohibition, or other federally enforceable requirement established pursuant to this part.

As demonstrated below the facility is subject to the requirements 40 CFR 63, Subpart ZZZZ. Thus, the general provisions of Subpart A may be applicable.

40 CFR Part 60, Subpart JJJJ, NSPS For Stationary Spark Ignition Internal Combustion Engines

The requirements of this subpart apply to stationary spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006. The emergency natural gas-fired engine-generator set is a model year 2020 unit and is subject to the requirements of this Subpart.

Emission Standards: 60.4233(d), and 60.4234

Pursuant to §60.4233(e), owners/operators of stationary SI ICE with a maximum engine power greater than 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their emergency stationary SI ICE. Per Table 1, the emissions standards for an engine rated at 25<HP<130 HP must meet the following standards: 10.0 g/HP-hr for NO_x+HC (note that footnote c of Table 1 states the emission standard of 10.0 g/hp-hr is for NO_x + HC) and 387 g/HP-hr for CO. The MY 2020 natural gas engine rated at 103 HP meets the emission standards of

Table 1 of this Subpart. The engine is equipped with a three-way catalyst.

Pursuant to §60.4234, owners and operators of stationary SI ICE must operate and maintain stationary spark ignition internal combustion engine that achieve the emission standards as required in §60.4233 over the entire life of the engine.

Fuel Requirements: 60.4235

There are no fuel requirements for emergency natural-gas fired engines.

Importing/Installing Requirements: 60.4236(c)

Emergency stationary SI ICE with a maximum engine power of greater than 19 KW (25 HP), owners and operators may not install engines that do not meet the applicable requirements in §60.4233 after January 1, 2011. The SI ICE meets the requirements of §60.4233.

Compliance Requirements for Owners and Operators: 60.4243

Section §60.4243(b) allows the owner to comply with the emissions standards by purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section. The engine must be installed and configured according to the manufacturer's emission-related specifications. If the facility does not operate and maintain the certified stationary SI internal combustion engine and control device according to manufacturer's emission-related written instructions, the engine will be considered a non-certified engine.

Pursuant to Section §60.4243(d), an emergency stationary ICE must be operated according to requirements in (d)(1)-(3) of Subpart JJJJ. Any operation except emergency operation, maintenance and testing, emergency demand response, and non-emergency operation for 50 hrs/yr, is prohibited. Note that the offset exemption of District Rule 207, Section 1.3.3, only allows the use of the engine for emergency operation, maintenance and testing for up to 60 hours per year. The permit will not allow for non-emergency use.

Pursuant to Section §60.4243(d)(1), there is no time limit on the use of emergency stationary ICE in emergency situations.

Pursuant to Section §60.4243(d)(2), for the purposes listed in paragraphs (d)(2)(i)-(iii), the emergency stationary ICE may be operated for a maximum of 100 hrs/calendar year. This requirement is subsumed by District Rule 207, Section 1.3.3 which only allows up to 60 hours per year.

- (d)(2)(i) – emergency stationary ICE may be operated for maintenance checks and readiness testing.
- (d)(2)(ii) – emergency stationary ICE may be operated for emergency demand response for periods up to 100 hrs/yr. The applicant has not stated that they want to use the unit for demand response.
- (d)(2)(iii) – Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

Notification, Reports, and Records Requirements: 60.4245

Pursuant to Section §60.4245(a)(2), the owner/operator must maintain records of the maintenance conducted on the engine.

Pursuant to Section §60.4245(e), reporting is required for engines greater than 100 HP and with greater than 15 hours/year for emergency demand response. The applicant has not stated that they want to use the unit for demand response.

Use of LPG for a natural gas engine during emergency operations:

Pursuant to Section §60.4243(e), owners/operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. The applicant has not stated that they want to use LPG as backup fuel.

40 CFR Part 63, Subpart ZZZZ – NESHAPS for Stationary Reciprocating Internal Combustion Engines

The requirements of this subpart apply to existing, new, and reconstructed stationary reciprocating internal combustion engines (RICE), at area and major sources of hazardous air pollutants (HAPs). The emergency IC engine-fire pump sets are RICE units located at an area source of HAP emissions, therefore 40 CFR 63 Subpart ZZZZ applies.

Emission Limitations, Management Practices, and Other Requirements: 63.6603(a), Table 2d

Pursuant to Section §63.6603, the owner/operator of RICE must comply with the requirements in Table 2d to this subpart. Also, there no performance test requirements for the three engines subject to this Subpart

Fuel Requirements

Pursuant to Section §63.6604(b), existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel. The stationary emergency diesel engines are not in a demand response program and are not subject to this requirement. However, District Rule 1010 requires the use of CARB diesel fuel for these engines.

Pursuant to Section §63.6625(f), existing emergency stationary RICE with a site rating of less than or equal to 500 HP must install a non-resettable hour meter if one is not already installed.

Pursuant to Section §63.6625(i), the diesel-fired engines have the option of utilizing an oil analysis program in order to extend the specified oil change requirements of Table 2d, item 1 or 4, of this subpart, as long they are performed at the same frequency as specified in Table 2d.

Continuous Compliance: §63.6605, 63.6640

Pursuant to Section §63.6605(a), the facility must be in compliance with the emission limitations and operating limitations in this subpart at all times.

Pursuant to Section §63.6605(b), the facility must operate and maintain any affected source, including

associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Pursuant to Section §63.6640(a), the facility must demonstrate compliance with the operating limitations of Table 2d according to the methods specified in Table 6 to this Subpart. Pursuant to Table 6, item 9, the facility must operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Pursuant to Section §63.6640(f), the emergency stationary RICE must be operated according to requirements in (f)(1)-(4). In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in nonemergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. Note that District Rule 1010 only allows the use of the engine for emergency operation, maintenance and testing, emergency demand response. The permit will not allow for non-emergency use.

Pursuant to Section §63.6640(f)(1), there is no time limit on the use of emergency stationary ICE in emergency situations.

Pursuant to Section §60.6640(f)(2), for the purposes listed in paragraphs (f)(2)(i)-(iii), the emergency stationary RICE may be operated for a maximum of 100 hrs/calendar year.

- (f)(2)(i) – emergency stationary RICE may be operated for maintenance checks and readiness testing. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. This requirement is subsumed by District Rule 1010, Section 3.2.1.3.1.1.3, which allows fire pumps to operate the number of hours per year necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems."
- (f)(2)(ii) – emergency stationary RICE may be operated for emergency demand response for periods up to 100 hrs/yr. The engines are not used for demand response.
- (f)(2)(iii) – Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

Since the District does not allow the use of emergency RICE for non-emergency operation, Sections 60.6640(f)(3) & (4) do not apply.

Recordkeeping Requirements: §63.6655

The engines must maintain records of the maintenance conducted on the RICE and records required in Table 6, item 9.

Permit conditions will be included on the permit to comply with this Subpart.

40 CFR Part 63, Subpart DDDDD – NESHAPS for Major Sources: Industrial Commercial, and Institutional Boilers and Process Heaters

The requirements of this subpart apply to industrial commercial, institutional boiler and process heaters located at major source of hazardous air pollutants (HAP). The Gonzales Winery Facility is not a major source of HAP emissions and is exempt from the requirements of this Subpart.

No conditions pertaining to this Subpart will be included on the permit.

40 CFR Part 63, Subpart JJJJJ – NESHAPS for Industrial, Commercial, and Institutional Boilers Area Sources

The requirements of this subpart apply to industrial commercial, institutional boiler and process heaters located at area sources. Section §63.11195(e) of the regulation exempts gas-fired boilers from meeting the requirements of this Subpart. The regulation defines a gas-fired boiler as a boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment (§63.11237). The natural gas-fired boilers meet the exemption of Section §63.11195(e) and are not subject to the requirements of this Subpart.

No conditions pertaining to this Subpart will be included on the permit.

40 CFR Part 64 – Compliance Assurance Monitoring

The requirements of this subpart apply to emissions units at Title V facilities that meet all of the three criteria specified in 40 CFR Part 64 Section §64.2(a)(1-3). The three applicability criteria are:

- The emission unit must be subject to a Federal emission limitation or standard for a regulated air pollutant, other than an exempt limitation.
- The emission unit uses a control device to achieve compliance with any such emission limitation or standard.
- This emission unit has potential pre-control device emissions of the specific pollutant being controlled greater than the major facility emissions threshold for that pollutant.

The facility's equipment is not equipped with any control devices. Thus, the equipment is not subject to the Compliance Assurance Monitoring (CAM) requirements.

No conditions pertaining to this Subpart will be included on the permit.

40 CFR Part 68 – Risk Management Planning: Accidental Release Prevention (Section 112r)

This part sets forth the list of regulated substances and thresholds, the petition process for adding or deleting substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accidental releases, and the State accidental release prevention programs approved under section 112(r). The list of substances, threshold quantities, and accident prevention regulations promulgated under this part do not limit in any way the general duty provisions under section 112(r)(1).

The facility has stated that the hazardous materials present at the Gonzales winery are below the thresholds under 40 CFR Part 68. Should the facility, as defined in 40 CFR §68.3 become subject to Part 68,

Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall submit a risk management plan (RMP) by the date specified in 40 CFR §68.10.

Pursuant to Section §68.215(c), for 40 CFR part 70 or part 71 permits issued prior to the deadline for registering and submitting the RMP and which do not contain permit conditions described in paragraph (a) of this section, the owner or operator or air permitting authority shall initiate permit revision or reopening according to the procedures of 40 CFR 70.7 or 71.7 to incorporate the terms and conditions consistent with paragraph (a) of this section.

A condition will be included on the permit to ensure compliance with these requirements. The condition will include the requirements of Section §68.215(c)(a) so that the Title V Permit will not have to be reopened in case the facility is subject to this Part after the Title V permit is issued.

40 CFR Part 82 – Protection of Stratospheric Ozone

An appropriate condition will be included on the permit to ensure compliance with these requirements.

PERMIT SHIELD

The District rules, Rule 218, allows for creation of permit shield provisions. A permit shield is a provision stating that compliance with the conditions of the Federal Operating Permit (FOP) shall be deemed compliance with any applicable requirements as of the date of FOP issuance.

M1W is not proposing to add a permit shield.

THE FOLLOWING CONDITIONS WILL BE INCLUDED ON THE TITLE V PERMIT:

The permit conditions listed on the Title V Permit are derived from District issued Authorities to Construct or Permits to Operate. The permit also includes the regulatory basis for each permit condition. Permit conditions are divided into the following sections: federally enforceable limits and standards, testing requirements and procedures, record keeping requirements, reporting requirements, and general conditions.

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

Please see the Proposed Title V permit for the federally enforceable emission limits and standard.

TESTING REQUIREMENTS AND PROCEDURES

Please see the Proposed Title V permit for the testing requirements and procedures.

MONITORING AND RECORD KEEPING REQUIREMENTS

Please see the Proposed Title V permit for the monitoring and recordkeeping requirements.

REPORTING REQUIREMENTS

Please see the Proposed Title V permit for the reporting requirements.

GENERAL CONDITIONS

Please see the Proposed Title V permit for the general conditions.

**MONTEREY BAY AIR RESOURCES DISTRICT
TITLE V OPERATING PERMIT TV-124**

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

ISSUED TO:

Constellation Brands U.S. Operations, Inc. for Gonzales Winery
PO Box 789
Gonzales, CA 93926

PLANT SITE LOCATION:

800 South Alta Street
Gonzales, California

ISSUED BY:

Richard Stedman, Air Pollution Control Officer

TBD
Effective Date

Nature of Business: Wine Manufacturing

SIC Code: 2084 – Wines, Brandy, and Brandy Spirits

RESPONSIBLE OFFICIAL:

Name: Ms. Monica Belavic
Title: General Manager Central Coast
Wine Making Operations
Phone: (805) 550-7501

ALTERNATE RESPONSIBLE OFFICIAL:

Name: Mr. Yamil Sales
Title: Director of Cellar Operations
Phone: (831) 258-9225

FACILITY CONTACT PERSON:

Name: Joe Barner
Title: Environmental Health & Safety Manager
Phone: (559) 231-7117

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FACILITY DESCRIPTION

Pursuant to Rule 218 of the Monterey Bay Air Resources District (District) Rules and Regulations, the District intends to issue an initial Title V Operating Permit to Constellation Brands U.S. Operations, Inc. (Constellation) for their existing winery manufacturing operations at their Gonzales Winery located in Gonzales, California.

The Gonzales Winery facility at 800 S. Alta Street in Gonzales is considered a federal Major Source and subject to the Title V permitting program due to the potential to emit volatile organic compounds (VOCs). The Operating Permit includes conditions to ensure that all federal requirements are satisfied.

The Gonzales Winery main operations include the fermentation, storage and aging of both red & white wine. In support of the winery operations the facility operates the following equipment: natural gas boilers, laboratory fume hood, and emergency internal combustion engines.

EQUIPMENT DESCRIPTION

WINERY OPERATIONS

1. Wine Fermentation And Storage: Fermentation Tanks, Storage Tanks And Oak Barrels Used For The Fermentation And Storage Of Wine.
2. Oak Barrel Storage And Aging: Oak Barrels Used For the Aging And Storage Of Wine.
3. Cleaver-Brooks Boiler #1, With Cleaver-Brooks Gas Buner, With A Maximum Capacity Of 6.277 MMBtu/Hr. Natural Gas Fired Only.
4. Cleaver-Brooks Boiler #2, With Cleaver-Brooks Gas Buner, With A Maximum Capacity Of 6.277 MMBtu/Hr. Natural Gas Fired Only.
5. Kewanee Boiler #3, With Kewanee Gas Buner, With A Maximum Capacity Of 12.554 MMBtu/Hr. Natural Gas Fired Only.
6. Parker Boiler #4, With Parker Gas Buner, With A Maximum Capacity Of 2.65 MMBtu/Hr. Natural Gas Fired Only.
7. LAARS Two-Stage Natural Gas Boiler, With A Maximum Capacity Of 3,999,840 Btu/Hr. Natural Gas Fired Only.
8. Ancillary Equipment

Distillation Equipment With Storage Tanks

Laboratory Equipment With Ventilation Systems

Emergency Internal Combustion Engine-Fire Pump

Emergency Internal Combustion Engine-Fire Pump

Emergency Internal Combustion Natural Gas Engine-Generator Set

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

1. The tank and barrel fermentation equipment are subject to the following operational restrictions: [District Rule 207]
 - a) Total wine fermentation shall not exceed 30,437,595 gallons per year.
 - b) Red wine fermentation shall not exceed 24,407,288 gallons per year.

2. Tank and barrel fermentation capacity shall not exceed 13,841,200 gallons. Any increase in fermentation capacity constitutes a modification of the permit and requires prior District approval. An increase in fermentation capacity is defined as the addition of new fermentation tanks, fermentation barrels, or the conversion of permitted storage tanks to fermentation tanks, without a corresponding removal of capacity from fermentation tanks, fermentation barrels, or conversion of existing fermentation tanks to storage tanks. [District Rule 207]

3. The facility-wide mass VOC emissions, excluding emissions from emergency internal combustion engines, shall not exceed 144 tons per year. [District Rule 207, Offsets]

4. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall demonstrate compliance with the emission limits of Condition 3 for VOCs as outlined below: [District Rule 207]
 - a) *Wine Fermentation and Storage (as identified in Equipment Description 1)*: The VOC emissions shall be based on the actual amount of red and white wine fermented and the following emission factors:
 - i) Red wine emission factor of 6.2 pounds of VOC per 1,000 gallons fermented (lb/1,000 gal).
 - ii) White wine emission factor of 2.5 lb/1,000 gal.

 - b) *Oak Barrel Storage/Aging (as identified in Equipment Description 2)*: The VOC emissions shall be based on the actual amount of red and white wine stored/aged at the facility and the

following emission factors:

- i) Red wine oak barrel storage/aging emission factor of 28.83 lb/1,000 gal-yr. Emission factor based on a 14.5% annual average weighted volumetric alcohol content and a 3% evaporation loss. A different loss percentage may be considered by the District on a case-by-case basis.
 - ii) White wine oak barrel storage/aging emission factor of 27.83 lb/1,000 gal-yr. Emission factor based on a 14.0% annual average weighted volumetric alcohol content and a 3% evaporation loss. A different loss percentage may be considered by the District on a case-by-case basis.
- c) *Natural Gas Boilers (as described in Equipment Description 3, 4, 5, 6 and 7):* The VOC emissions shall be based on emission factor 5.5 pounds per million cubic feet of gas (lb/MMft³) and the actual natural gas fuel consumption. The fuel consumption shall be actual metered throughput.
 - d) *Distillation Equipment (as described in the Ancillary Equipment Description 8):* The VOC emissions shall be based on the emission factor of 0.729 lb/1,000 gal and the actual throughput through the equipment.
 - e) *Laboratory Equipment with ventilation system (as described in the Ancillary Equipment Description 8):* The VOC emission shall be based on the actual solvent used at the equipment.
 - f) *Emergency Internal Combustion Engines - Fire Pumps and Generator Set (as described in the Ancillary Equipment Description 8):* The emissions from the emergency internal combustion engines (ICE) do not count towards the facility-wide VOC limit, per District Rule 207 offset exemption for emergency ICE.
5. During the fermentation process, the maximum average temperature in open-top fermentation tanks shall not exceed 95 degrees Fahrenheit. [District Rule 207]
6. The wine storage tanks subject to the following operational restrictions: [District Rule 207]
- a) All wine storage tanks 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.
 - b) All wine storage tanks 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.
 - c) All wine stored in tanks shall be maintain at a temperature of 75 degrees Fahrenheit or lower. The temperature of the stored wine shall be determined and recorded in a log 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.

7. The maximum annual average oak barrel wine aging/storage capacity shall not exceed 4,130,000 gallons per year, based upon calendar year quarterly averages. [District Rule 207]
8. The emission concentration of oxides of nitrogen, as NO₂, in the two-stage boiler, as identified in Equipment Description 7, exhaust to the atmosphere, shall not exceed 30 ppmv dry, calculated at 3 percent O₂. [District Rule 207]
9. The District may review the emission factors should Constellation Brands U.S. Operations, Inc. dba Gonzales Winery exceed 14.5% annual average weighted volumetric alcohol content based on a cumulative weighted average of three (3) or more consecutive years of data. [District Rule 207]
10. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall minimize the use of solvents; and use of lowest practical vapor pressure solvents; and use of controlled flow solvent dispenser (e.g., squeeze bottle); and all cloths/papers and solvents not in active use kept in closed containers at the laboratory operations, as described in the Ancillary Equipment Description 8. [District Rule 207, BACT]
11. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1, or equivalent 20% opacity. [District Rule 400]
12. Particulate matter shall not exceed 0.15 grains per standard dry cubic foot in the exhaust stream of the boilers. [District Rule 403]
13. Sulfur compounds calculated as sulfur dioxide (SO₂) shall not exceed 0.2 percent by volume in the exhaust stream of the internal combustion diesel engines and boilers. [District Rule 404]
14. The natural gas combusted in the boilers and natural gas emergency engine-generator set must not contain more than 50 grains of hydrogen sulfide per 100 cubic feet of gas. [District Rule 412]
15. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall limit emissions of volatile organic compounds by the use of architectural coatings which comply with the requirements of District Rule 426. [District Rule 426]

16. The emergency natural gas engine-generator set shall be operated less than 60 hours per year for maintenance and testing purposes. [Basis: District Rule 101, Section 2.10 and District Rule 207, Section 1.3.3 Offsets]
17. Except for maintenance and testing purposes, the emergency natural gas engine-generator set shall only be operated when the local utility powerline service fails. [Basis: District Rule 101 and District Rule 207, Section 1.3.3, Offsets]
18. The emergency natural gas internal combustion engine must not be operated unless it is vented to the catalytic reduction system which is in full use and operating properly. [Basis: District Rule 207, BACT]
19. The three-way catalytic converter serving the emergency natural gas engine-generator set shall be operated and maintained in accordance with manufacturer specifications and procedures. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery must keep records of conducted maintenance to demonstrate compliance with manufacturer's emission-related written instructions. Maintenance records shall be retained for at least five (5) years and made available to District staff upon request. [Basis: District Rule 207, BACT]
20. The emergency natural gas engine shall be equipped with a non-resettable meter which registers the total hours operated and shall be maintained in good working condition. [Basis: District Rule 207 and 40 CFR 60, Subpart JJJJ]
21. The emergency natural gas engine shall be operated and maintained in accordance with manufacturer specifications and procedures. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery must keep records of conducted maintenance to demonstrate compliance with manufacturer's emission-related written instructions. Maintenance records shall be retained for at least five (5) years and made available to District staff upon request. [40 CFR Part 60, Subpart JJJJ]
22. The diesel fuel consumed in the diesel-powered engines shall meet California Air Resources Board (CARB) specifications, or the alternative diesel fuel specifications as defined in CARB's Alternative Diesel Fuels Regulation. [District Rule 207, District Rule 412, and 40 CFR 63 Subpart ZZZZ]
23. The emergency diesel engine fire pumps, as described in the Ancillary Equipment Description 8, shall only be operated the number of hours necessary to comply with the inspection, maintenance, and testing requirements of the National Fire Protection Association (NFPA). [District Rule 207]

& 40 CFR 63, Subpart ZZZZ, Section §63.6640(f)(2)(i)]

24. The emergency diesel engine fire pumps, as described in the Ancillary Equipment Description 8, shall be equipped with a meter which registers the total hours operated, and shall be maintained in good working condition. [40 CFR 63, Subpart ZZZZ]
25. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery must minimize the internal combustion engine time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, for the engines identified in emergency diesel engine fire pumps in the Ancillary Equipment Description 8. [40 CFR 63 Subpart ZZZZ]
26. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall operate and maintain the emergency diesel engine fire pumps, as described in the Ancillary Equipment Description 8, in accordance with manufacturer specifications and shall implement the following engine management practice standards. [40 CFR Part 63, Subpart ZZZZ]
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and,
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The specified oil change-out frequency above may be extended provided an optional oil analysis program is instituted with prior District approval as follows:

- i) The oil analysis program must be performed at the same frequency as the oil change-out timelines.
 - ii) The oil analysis program must, at a minimum, analyze the Total Base Number, Viscosity, and Percent Water Content of the present engine oil. Should the Total Base Number remain 30 percent or more of the Total Base Number for new oil, viscosity change no more than 20 percent from the viscosity for new oil, and water content by volume be no more than 0.5 percent, the present engine oil does not need to be changed. If any of the limits are exceeded, the oil must be changed within two (2) working days of receiving the results of the analysis, or before recommencing operation if the engine is out of service.
 - iii) Records of the oil analysis results and oil changes shall be retained with the maintenance records as required by this permit.
27. Should Constellation Brands U.S. Operations, Inc. dba Gonzales Winery become subject to the requirements of 40 CFR Part 68, *Chemical Accident Prevention Provisions*, Constellation Brands U.S. Operations, Inc. dba Gonzales shall meet the requirements of Section §68.215(a). The facility

must submit a compliance schedule for meeting the requirements of this part by the date provided in § 68.10(a) or; as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of this part, including the registration and submission of the Risk Management Plan (RMP). Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]

28. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall comply with the requirements of 40 CFR Part 82 – Protection of Stratospheric Ozone. [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

29. No testing is specified for the generic (Rule 400) opacity requirement from Condition 11. The natural gas boilers are assumed to be in compliance with the opacity requirement due to the firing of gaseous fuel. If testing is conducted for Condition 11, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery should conduct testing in accordance with the methodology contained in EPA Method 9 and the averaging/aggregating period contained in District Rule 400. [District Rule 218]
30. No testing is specified for the generic (Rule 403) particulate matter emission standard from Condition 12. The natural gas boilers are assumed to be in compliance with the particulate matter emission standard due to the firing of gaseous fuel and upon the calculations contained in the engineering evaluation. District Rule 403 exempts internal combustion engines from the requirements of the Rule. If testing is conducted for Condition 12, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery should conduct testing in accordance with the methodology contained in EPA Method 5. [District Rule 218]
31. No testing is specified for the generic (Rule 404) sulfur concentration limit in Condition 13. The natural gas boilers and internal combustion engines are assumed to be in compliance with the sulfur concentration limit based upon the calculations contained in the engineering evaluation. If testing is conducted for Condition 13, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery should conduct testing in accordance with the methodology contained in EPA Method 20. [District Rule 218]
32. No testing is specified for the generic (Rule 412) hydrogen sulfide concentration limit in Condition 14. The natural gas boilers and internal combustion engines are assumed to be in compliance with the hydrogen sulfide concentration limit based upon the calculations contained in the engineering evaluation. If testing is conducted for Condition 14, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery should conduct testing in accordance with the methodology contained in ASTM Method 5504. [District Rule 218]

MONITORING AND RECORD KEEPING REQUIREMENTS

33. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain a monthly log which contains the activity/usage data, including the permit to operate (PTO) number, for each emission unit subject to the facility-wide VOC emission limit of Condition 3. The activity/usage data shall include the following records: [District Rule 207]
- a) Monthly red and white wine fermented.
 - b) Monthly amount of red and white wine stored/aged in oak barrels.
 - c) Monthly fuel usage combusted in the natural gas boilers identified in Equipment Description 3, 4, 5, 6, and 7.
 - d) Monthly throughput processed in the distillation equipment, as identified in the Ancillary Equipment Description 8.
 - e) Monthly solvent used in the laboratory equipment, as identified in the Ancillary Equipment Description 8.

All records shall be kept on site and be available for inspection by District personnel for at least 5 years from the date that a record was made.

34. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall track the amount of red and white wine fermented in tanks and oak barrels, and record the amount in units of gallons. [District Rule 207]
35. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall track the amount of red wine aged/stored in oak barrels and white wine aged/stored in oak barrels, and record by month in units of gallons. [District Rule 207]
36. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain the following information: [District Rule 207]
- a) The monthly US Department of the Treasury Alcohol and Tobacco Tax and Trade Bureau (TTB) "Report of Wine Premises Operations" reports or the monthly wine production based on the Winery's AS400 database.
 - b) The annual (calendar year) amount of red wine fermented and white wine fermented, summarized from the TTB reports, shall be maintained in a clear and legible log in units of gallons or summarized from the Winery's AS400 database.
 - c) The annual (calendar year) amount of red wine aged/stored in oak barrels and white wine aged/stored in oak barrels shall be maintained in a clear and legible log in units of gallons.
 - d) The most current Tank Equipment List and Tank Location Map, including oak barrels, as the facility is configured on December 31, of each year. At a minimum, each fermentation

and storage tank shall be identified by its capacity, use (fermentation only, storage and fermentation, or storage only), and facility identification number.

- e) The average annual weighted volumetric alcohol content for red and white wine production.

This data shall be maintained on-site for a minimum of five (5) years from the date of entry and made available to the District upon request.

- 37. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain a list of all chemicals used in the laboratories and shall be responsible for keeping the list accurate by adding and deleting chemicals, as necessary. [District Rule 207]
- 38. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain on-site a monthly log of the amount of all chemicals used in the laboratory and the number of operating days in each month. Records shall be retained for at least five years in a readily accessible location, and made available to District staff upon request. [District Rule 207]
- 39. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain on-site a monthly log of all acids and solvent-containing materials used in this operation, and the number of operating days in each month. [District Rule 207]
- 40. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain a log, summarized monthly, to record the following operations for the emergency natural gas engine-generator set: [Basis: District Rule 207 and 40 CFR 60 Subpart JJJJ]
 - a) Emergency use hours of operation;
 - b) Maintenance and testing hours of operation;
 - c) Fuel usage. If no fuel records are available, reported fuel usage can be estimated based on a maximum fuel usage rate of 730 ft³/hr (0.000730 MMft³/hr); and,
 - d) Records of conducted maintenance to demonstrate compliance with manufacturer's emission-related written instructions.
- p
- 41. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain records of how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation for the diesel emergency engine fire pumps identified in the Ancillary Equipment Description 8 to show compliance with Condition 23. [40 CFR Part 63, Subpart ZZZZ]
- 42. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain records of all maintenance activities on each engine fire pump identified in the Ancillary Equipment Description 8. [40 CFR Part 63, Subpart ZZZZ]

43. As applicable Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain the following general records of required monitoring information [District Rule 218]:
- a) the date and time of sampling or measurements;
 - b) the date(s) analyses were performed;
 - c) the company or entity that performed the analyses;
 - d) the analytical techniques or methods used;
 - e) the results of such analyses;
 - f) the operating conditions existing at the time of sampling or measurement; and
 - g) the records of quality assurance for continuous monitoring systems (including, but not limited to quality control activities, audits, and calibration drift checks) and source testing methods.
44. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall maintain records on the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the control equipment under this permit. [District Rule 218]
45. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [District Rule 218]

REPORTING REQUIREMENTS

46. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall report all breakdowns to the Air Pollution Control Officer (APCO) within 1 hour of the occurrence. This one-hour period may be extended up to six hours for good cause by the APCO.

The estimated time for repair of the breakdown shall be supplied to the APCO within 24 hours of the occurrence and a written report shall be supplied to the APCO within 5 days after the occurrence has been corrected. This report shall include at a minimum [District Rule 214 Adopted 12/13/1984]:

- a) A statement that the condition or failure has been corrected and the date of the correction; and
- b) A description of the reasons for the occurrence; and
- c) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future; and
- d) An estimate of the emissions caused by the condition or failure.

47. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31. [District Rule 218]

These monitoring reports shall include at a minimum:

- a) The time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
- b) All information pertaining to any monitoring and recordkeeping as required by the permit; and
- c) A negative declaration specifying when no excess emissions occurred.

48. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year. [District Rule 218]

This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:

- a) identification of each term or condition of the permit that is the basis of the certification; and
- b) the compliance status; and
- c) whether compliance was continuous or intermittent; and
- d) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

GENERAL CONDITIONS

49. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]

50. In an enforcement action, the fact that Constellation Brands U.S. Operations, Inc. dba Gonzales Winery would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]

51. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Constellation Brands U.S. Operations, Inc. dba Gonzales Winery for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
52. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
53. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
54. For applicable requirements that will become effective during the permit term, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
55. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
56. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rule 218]
57. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]

58. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]
59. Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]
60. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall submit to the District relevant evidence which demonstrates [District Rule 218]:
- a) an emergency occurred; and
 - b) that Constellation Brands U.S. Operations, Inc. dba Gonzales Winery can identify the cause(s) of the emergency; and
 - c) that the facility was being properly operated at the time of the emergency; and
 - d) that all steps were taken to minimize the emissions resulting from the emergency; and
 - e) within two working days of the emergency event, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery provided the District with a description of the emergency and any mitigating or corrective actions taken.
61. Upon presentation of credentials, Constellation Brands U.S. Operations, Inc. dba Gonzales Winery shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:
- a) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
 - b) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
 - c) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
 - d) to sample emissions from the source.
62. The renewal application for this permit shall be submitted at least 6 months but no greater than 18 months prior to permit expiration. [District Rule 218]
