EXHIBIT F

Santa Barbara County
Air Pollution Control District

September 15, 2017

Certified Mail
9171 9690 0935 0156 4856 04

Richard Mather
Central Coast Wine Services
2717 Aviation Way, Suite 101
Santa Maria, CA 93455

FID: 11042
Permit: AM 15044 - 01
SSID: 10834

Re: Final Authority to Construct 15044
Fee Due: $ 429

Dear Mr. Mather:

Enclosed is the final Authority to Construct Modification (ATC Mod) No. 15044 -01 for a modification to the calculation methodology for the combined capture and control system efficiency as well as revisions to the SCDP condition language for your winemaking facility at 2717 Aviation Way, Suite 101 in Santa Maria.

THIS IS NOT YOUR PERMIT TO OPERATE. PLEASE READ ALL PERMIT CONDITIONS CAREFULLY.

Please carefully review the enclosed documents to ensure that they accurately describe your facility and that the conditions are acceptable to you. Note that your permitted emission limits may, in the future, be used to determine emission fees.

You should become familiar with all District rules pertaining to your facility. This permit does not relieve you of any requirements to obtain authority or permits from other governmental agencies.

This permit requires you to:

- Pay a **fee** of $429, which is due immediately and is considered late after 30 calendar days from the date stamped on the permit. Pursuant to District Rule 210.IV.B, no appeal shall be heard unless all fees have been paid. See the attached invoice for more information.
- Follow the conditions listed on your permit. Pay careful attention to the recordkeeping and reporting requirements.
- Mail us the enclosed Start-up Notification postcard once you have completed construction of the permitted equipment and are ready to operate it.
- Apply for and obtain a Permit to Operate prior to commencing routine equipment operation.
- Ensure that a copy of the enclosed permit is posted or kept readily available near the permitted equipment.
- Promptly report changes in ownership, operator, or your mailing address to the District.

If you are not satisfied with the conditions of this permit, **you have thirty (30) days from the date of this issuance to appeal this permit to the Air Pollution Control District Hearing Board** (ref: California Health and Safety Code, §42302.1). Any contact with District staff to discuss the terms of this permit will not stop or alter the 30-day appeal period.

Please include the facility identification (FID) and permit numbers as shown at the top of this letter on all correspondence regarding this permit. If you have any questions, please contact Kevin Brown of my staff at (805) 961-8826.

Sincerely,

Michael Goldman, Manager
Engineering Division

enc: Final ATC Mod 15044 - 01
Final Permit Evaluation
Invoice # AM 15044 - 01
Air Toxics "Hot Spots" Fact Sheet District Form 12B
Start-up Notification Postcard

cc: Central Coast Wine Services 11042 Project File
Engr Chron File
Accounting (Invoice only)

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Santa Barbara County
Air Pollution Control District
260 N San Antonio Rd, Suite A
Santa Barbara, CA 93110-1315

Invoice: AM 15044 - 01
Date: SEP 15 2017
Terms: Net 30 Days

350150/6600/3280

INVOICE

BILL TO:	FACILITY:
Richard Mather Central Coast Wine Services (103930) 2717 Aviation Way, Suite 101 Santa Maria, CA 93455	Central Coast Wine Services 11042 2717 Aviation Way, Suite 101 Santa Maria

Permit: Authority to Construct (ATC) No. 15044 - 01

Fee Type: Permit Evaluation Fee (see the Fee Statement in your permit for a breakdown of the fees)

Amount Due: $ 429

REMIT PAYMENTS TO THE ABOVE ADDRESS
Please indicate the invoice number AM 15044 - 01
on your remittance.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR INVOICE PLEASE CONTACT
OUR ADMINISTRATION DIVISION AT (805) 961-8800

The District charges $25 for returned checks. Other penalties/fees may be incurred as a result of returned checks and late payment (see District Rule 210). Failure to pay this Invoice may result in the cancellation or suspension of your permit. Please notify the District regarding any changes to the above information

Santa Barbara County
Air Pollution Control District

Authority to Construct 15044 - 01

EQUIPMENT OWNER:

Central Coast Wine Services

EQUIPMENT OPERATOR:

Central Coast Wine Services

EQUIPMENT LOCATION:

2717 Aviation Way, Suite 101, Santa Maria

STATIONARY SOURCE/FACILITY:

Central Coast Wine Services

SSID: 10834
FID: 11042

AUTHORIZED MODIFICATION:

This permit authorizes the modification to the calculation methodology for the combined capture and control system efficiency found in ATC 15044. The calculation is being modified from a 30-day rolling average to an average taken over the course of an entire fermentation season. Additionally, the SCDP condition found in ATC 15044 is being modified to allow for the SCDP to take place over 90 days or the entire fermentation season, whichever is longer.

EQUIPMENT DESCRIPTION:

There are no changes to the project equipment list.

PROJECT/PROCESS DESCRIPTION:

There are no changes to the project/process description.

CONDITIONS:

This permit modifies specific conditions of ATC 15044. Only the permit conditions affected by this permit modification are shown below. The revised permit conditions, table references, and attachments use the naming conventions as presented in ATC 15044. Beyond the changes herein, all other conditions of ATC 15044 remain in effect and in full force. Note that administrative conditions are included in all District permits.

2. **Operational Restrictions.** The permittee shall follow the operational requirements specified in ATC 15044 Condition 2 with the exception that ATC 15044 Condition 2.d shall be superseded by the following:

   d. Collectively, the capture and control systems shall achieve a minimum combined capture and control efficiency of 67.0% (mass basis) over an entire fermentation season. Compliance with this condition shall be based on weekly reporting during fermentation as specified in Condition 11.

3. **Monitoring.** The permittee shall follow the monitoring requirements specified in ATC 15044 Condition 3 with the exception that ATC 15044 Condition 3.j shall be superseded by the following:

   j. The permittee shall monitor the collective capture and control efficiency of the NoMoVo and EcoPAS systems over an entire fermentation season, as specified in the District-approved *Monitoring, Recordkeeping, and Reporting Plan.*

4. **Recordkeeping.** The permittee shall follow the recordkeeping requirements specified in ATC 15044 Condition 4 with the exception that ATC 15044 Condition 4.i shall be superseded by the following:

   i. The collective capture and control efficiency of the NoMoVo and EcoPAS systems, as specified in the District-approved *Monitoring, Recordkeeping, and Reporting Plan.*

5. **Reporting.** The permittee shall follow the reporting requirements specified in ATC 15044 Condition 5 with the exception that ATC 15044 Condition 5.k shall be superseded by the following:

   k. EcoPAS capture and control systems, as specified in the District-approved *Monitoring, Recordkeeping, and Reporting Plan.*

6. **Best Available Control Technology (BACT).** The following shall supersede ATC 15044 Condition 6 in its entirety:

   The permittee shall apply emission control technology and plant design measures that represent Best Available Control Technology (BACT) to the operation of the equipment/facilities as described in this permit and the District's Permit Evaluation for this permit. Table 3 and the *Emissions Limitations, Operational Restrictions, Monitoring, Recordkeeping and Reporting*

Conditions of this permit define the specific control technology and performance standard emission limits for BACT. BACT shall be in place, and shall be operational at all times for the life of the project. BACT related monitoring, recordkeeping and reporting requirements are defined in those specific permit conditions.

9. **Source Compliance Demonstration Period (SCDP).** The following shall supersede ATC 15044 Condition 9 in its entirety:

Equipment permitted herein is allowed to operate temporarily during a 90-day SCDP or the entire fermentation season, whichever is longer. Initial operations of the permitted equipment (defined as the commencement of any activities applied for and authorized by this permit) define the start of the SCDP. Within 14 days of initial operations, the permittee shall provide the District written notification of the SCDP start date (using the attached yellow SCDP notification card or by e-mail notification to engr@sbcapcd.org). During the SCDP, the permittee shall comply with all operational, monitoring, recordkeeping and reporting requirements as specified in this permit.

Prior to the start of the SCDP, the permittee shall:

a. Submit and obtain District approval of a revised *Monitoring, Recordkeeping, and Reporting Plan*. This plan update shall address all the permit monitoring, recordkeeping and reporting requirements associated with the EcoPAS and NoMoVo systems. This shall include the capture and control efficiency calculation methodology.

During the SCDP, the permittee shall:

b. Begin the monitoring and recordkeeping as specified in the Monitoring and Recordkeeping Conditions of this permit;

c. Arrange for District inspection not more than fourteen (14) calendar days (or other mutually agreed to time period) after the SCDP begins. A minimum of five calendar days advance notice shall be given to the District. This inspection is required to verify that the equipment and its operation are in compliance with District Rules and Permit Conditions;

d. Submit a Permit to Operate (PTO) application and the appropriate filing fee not more than 60 calendar days after the SCDP begins pursuant to District Rule 201.E.2. Upon the District's determination that the permit application is "complete", the permittee may continue temporary operations under the SCDP until such time the PTO is issued final or one year from the date of PTO application completeness, whichever occurs earlier.

SCDP extensions may be granted by the District for good cause. Such extensions may be subject to conditions. When good cause cannot be demonstrated, no administrative extension is available and the permittee shall cease operations or the permittee may submit an application to revise the ATC permit. A written request to extend the SCDP shall be made by the permittee at least seven days prior to the SCDP expiration date.

11. **Weekly Reporting During Fermentation.** The permittee shall follow the requirements specified in ATC 15044 Condition 11 with the exception that ATC 15044 Condition 11.d is hereby deleted:

    ~~d. The collective capture and control efficiency of the NoMoVo and EcoPAS systems based on a 30-day rolling average.~~

14. **Consistency with Analysis.** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the District's project file) and the District's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.

15. **Equipment Maintenance.** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.

16. **Compliance.** Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.

17. **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.

18. **Conflict Between Permits.** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.

19. **Access to Records and Facilities.** As to any condition that requires for its effective enforcement the inspection of records or facilities by the District or its agents, the permittee shall make such records available or provide access to such facilities upon notice from the District. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.

20. **Equipment Identification.** Identifying tag(s) or name plate(s) shall be displayed on the equipment to show manufacturer, model number, and serial number. The tag(s) or plate(s) shall be affixed to the equipment in a permanent and conspicuous position.

21. **Emission Factor Revisions.** The District may update the emission factors for any calculation based on USEPA AP-42, CARB or District emission factors at the next permit modification or permit reevaluation to account for USEPA, CARB and/or District revisions to the underlying emission factors.

22. **Nuisance.** Except as otherwise provided in Section 41705 of the California H&SC, no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

23. **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for revocation pursuant to California Health & Safety Code Section 42307 *et seq*.

24. **Transfer of Owner/Operator.** This permit is only valid for the owner and operator listed on this permit unless a *Transfer of Owner/Operator* application has been applied for and received by the District. Any transfer of ownership or change in operator shall be done in a manner as specified in District Rule 203. District Form –01T and the appropriate filing fee shall be submitted to the District within 30 days of the transfer.

AIR POLLUTION CONTROL OFFICER

SEP 15 2017

DATE

Attachments:

- Table 3 – Best Available Control Technology
- Permit Evaluation for Authority to Construct 15044

Notes:

- This permit is valid for one year from the date stamped above if unused.

TABLE 3 - Best Available Control Technology
ATC Mod 15044 - 01
Central Coast Wine Services

Emission Source	Pollutant	BACT Technology	BACT Performance Standard
Wine Fermentation Tanks	ROC	NoMoVo and EcoPAS winery emission capture and control systems	Combined capture and control efficiency of 67.0% (mass basis) over an entire fermentation season

Santa Barbara County
Air Pollution Control District

Authority to Construct 15044 – 01

1.0 BACKGROUND

1.1 General: See ATC 15044 for a detailed description of the project background.

On September 15, 2017, CCWS submitted an application to modify the calculation methodology for the combined capture and control efficiency for the EcoPAS and NoMoVo systems found in ATC 15044. The calculation would be changed from a 30-day rolling average to an average over the course of an entire fermentation season. Additionally, the SCDP condition would be reworded to allow the entire fermentation season to be included in the SCDP. The District deemed the application complete on September 15, 2017.

1.2 Permit History:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
ATC/PTO 12733	06/05/2009	Initial facility permit.
ATC/PTO Mod 12733-01	10/09/2009	Revise operational conditions.
ATC/PTO Mod 12733-02	09/08/2010	Revise emission and operational conditions.
Reeval 12733-R1	05/11/2012	Triennial permit renewal.
ATC 14257	09/23/2013	Installation of a single NoMoVo control system
PTO 14257	12/13/2013	Operating permit for the NoMoVo control system.
ATC 14350	07/28/2014	Installation for new tanks and control systems. Permit not used.
ATC Mod 14350-01	09/23/2014	Added barrel room to ATC 14350. Permit not used.
Reeval 12733 R2	06/25/2015	Triennial permit renewal.
ATC 14696	07/24/2015	Installation of EcoPAS capture control system.
PTO 14696	03/23/2016	Permit to Operate for ATC 14696.
ATC 15044	08/18/2017	Increased wine fermentation and emission limits, allow red wine fermentation in 400 series tanks, and construct new barrel room. BACT was triggered for this project.

1.3 Compliance History: See ATC 15044 for a detailed description of the facility's compliance history.

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: See ATC 15044 for a complete description regarding the equipment/processes for this project.

2.2 Emission Controls: See ATC 15044 for a complete description regarding the emission controls for this project.

2.3 Emission Factors: See ATC 15044 for a complete description regarding the emission factors for this project.

2.4 Reasonable Worst Case Emission Scenario: See ATC 15044 for a complete description regarding the reasonable worst case emissions scenario for this project.

2.5 Emission Calculations: See ATC 15044 for a complete description regarding the emission calculations for this project.

2.6 Special Calculations: The permittee will calculate the combined capture and control efficiency over an entire fermentation season for the NoMoVo and EcoPAS systems using the equation below. Note that Day 1 is the first day of the fermentation season and Day n is the final day of the fermentation season.

$$CEE = \frac{(\sum_1^n C_{EcoPAS} + \sum_1^n C_{NoMoVo})}{\sum_1^n U} * 100$$

Where:

- CCE = Combined capture and control efficiency for the NoMoVo and EcoPAS systems over the entire fermentation season, %
- C_{EcoPAS} = EcoPAS systems' daily captured and controlled wine emissions, lbs
- C_{NoMoVo} = NoMoVo systems' daily captured and controlled wine emissions, lbs
- U = Daily uncontrolled wine emissions, lb
- n = Number of days in the fermentation season

The special calculation equation found in ATC 15044 shall be replaced by the equation above.

2.7 BACT Analyses: Both control systems found in ATC 15044 have been guaranteed by their respective manufacturers to meet a combined capture and control efficiency of 67.0% over the course of a complete fermentation batch cycle. In order to minimize the monitoring, recordkeeping and reporting requirements, a combined capture and control efficiency for both systems is used for compliance purposes. Due to the varying nature of wine fermentation cycles and to minimize the impact of non-standard operations, the calculated collective capture and control efficiency will be based over an entire fermentation season.

2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.

2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable.

2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the District.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

4.1 Partial List of Applicable Rules:

Rule 201.	Permits Required
Rule 202.	Exemptions to Rule 201
Rule 205.	Standards for Granting Permits
Rule 301.	Circumvention
Rule 302.	Visible Emissions
Rule 303.	Nuisance
Rule 801.	New Source Review- Definitions and General Requirements
Rule 802.	New Source Review
Rule 809.	Federal Minor Source New Source Review
Rule 810.	Federal Prevention of Significant Deterioration

4.2 Rules Requiring Review: None.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 Offsets: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 ERCs: This source does not generate emission reduction credits.

7.0 AIR TOXICS

An air toxics health risk assessment was not required for this permitting action.

8.0 CEQA / LEAD AGENCY

The District is the lead agency under CEQA for this project. This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised April 30, 2015). Appendix A (*APCD Projects Exempt from CEQA* and *Equipment or Operations Exempt from CEQA*) provides an exemption specifically for projects at new or existing sources or facilities with a potential to emit less than the Best Available Control Technology (BACT) thresholds specified in APCD Regulation VIII. No further action is necessary.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of Health and Safety Code Section 42301.6 was not required.

10.0 PUBLIC and AGENCY NOTFICATION PROCESS/COMMENTS ON DRAFT PERMIT

10.1 This project was not subject to public notice.

10.2 The permittee had no comments on the draft permit.

11.0 FEE DETERMINATION

Fees for the District's work efforts are assessed on a fee basis. The Project Code is *350150* (*Wineries*). See Attachment I for the fee calculations.

12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

Kevin Brown	September 15, 2017	MM	9-15-17
AQ Engineer/Technician	Date	Supervisor	Date

13.0 ATTACHMENT(S)

C-1. IDS Tables
D. BACT Documentation
I-1. Fee Statement

ATTACHMENT C-1
IDS Tables

PERMIT POTENTIAL TO EMIT

	NO_x	ROC	CO	SO_x	PM	PM_{10}	$PM_{2.5}$
lb/day		0.00					
lb/hr							
TPQ							
TPY		0.00					

FACILITY POTENTIAL TO EMIT

	NO_x	ROC	CO	SO_x	PM	PM_{10}	$PM_{2.5}$
lb/day		174.98					
lb/hr							
TPQ							
TPY		9.99					

STATIONARY SOURCE POTENTIAL TO EMIT

	NO_x	ROC	CO	SO_x	PM	PM_{10}	$PM_{2.5}$
lb/day		174.98					
lb/hr							
TPQ							
TPY		9.99					

Notes:
(1) Emissions in these tables are from IDS.
(2) Because of rounding, values in these tables shown as 0.00 are less than 0.005, but greater than zero.

Authority to Construct 15044 - 01

ATTACHMENT D
BACT Determination

ENGINEERING EVALUATION BACT DISCUSSION LIST- NoMoVo System

1. Pollutant(s): ROC

2. Emission Points: Wine Fermentation Tanks

3. BACT Determination Summary:

   Technology: NoMoVo Capture and Control System

   Performance Standard: Collective facility-wide capture and control efficiency of 67.0% (mass basis) over an entire fermentation season.

4. Level of Stringency: [x] Achieved in Practice
   [ ] Technologically Feasible
   [ ] RACT, BARCT, NSPS, NESHAPS, MACT

5. BACT Selection Process Discussion: The applicant has successfully operated a NoMoVo system at the facility for four fermentation seasons and has established a proven "track-record" of reliability. The District has determined that the NoMoVo emissions control system is an achieved-in-practice BACT technology. Additionally, the USEPA has determined that the NoMoVo capture and control system is considered an achieved-in-practice control technology for wine fermentation. This BACT determination was based on the application materials, the manufacturer's capture and control efficiency guarantee, and prior operational history of these controls at the CCWS facility.

6. BACT Effectiveness: BACT is expected to be effective over the course of a complete fermentation cycle.

7. BACT During Non-Standard Operations: Non-standard operations identified by the applicant are winemaking operations that require the closed tank hatches or manways to be opened. These activities include visual inspections, tank pump-overs, red wine cap breakups, delastage, and wine additions. The time taken to complete these activities shall be minimized per the permit conditions. BACT is not feasible during these non-standard operations since the manifold inlet valve shall be closed prior to commencing these activities. Additionally, BACT is not feasible during tank foam-overs.

8. Operating Constraints: A NoMoVo (or EcoPAS) system must be used to capture and control emissions from all fermentation operations in the tanks subject to this permit. Collectively, the systems must achieve a minimum capture and control efficiency greater than or equal to 67.0% (mass basis) over an entire fermentation season. All manifold piping shall be vapor tight and slope downward to the control system. All slurry drained from a NoMoVo system must be disposed or treated in a District-approved method.

9. Continuously Monitored BACT: CEMS are not required for this project.

ATTACHMENT D
BACT Determination

10. Source Testing Requirement: There are no source testing requirements for this capture and control equipment. The capture and control efficiency of the NoMoVo system shall be determined using a mass balance approach. Specifically, the amount of ethanol captured and controlled each day will be determined through analysis of the slurry at the end of each 24 hour period. The total daily uncontrolled ethanol emissions will be calculated using District-approved emission factors and calculation methodologies. The daily uncontrolled emissions and amount of ethanol captured will be used to calculate the daily control efficiency. The daily control efficiencies will be averaged over an entire fermentation season to determine compliance with the BACT performance standard.

11. Compliance Averaging Times: The capture and control efficiency shall be based on an entire fermentation season.

12. Multi-Phase Projects: This is not a multi-phase project.

13. Referenced Sources: The following sources were reviewed to determine BACT: Application material; NoMoVo manufacturer's capture and control efficiency guarantee; SBCAPCD *Achieved in Practice Determination for Wine Fermentation Emission Control Technologies* Memo; U.S. EPA Region 9 letter to SJVAPCD regarding Bear Creek Winery, CBUS Ops Inc., Delicato Vineyard, and E&J Gallo Winery projects, September 30, 2016; CARB BACT Clearinghouse.

14. PSD BACT: Not Applicable

Authority to Construct 15044 - 01

ATTACHMENT D
BACT Determination

ENGINEERING EVALUATION BACT DISCUSSION LIST- EcoPAS System

1. Pollutant(s): ROC

2. Emission Points: Wine Fermentation Tanks

3. BACT Determination Summary:

   Technology: EcoPAS Ethanol Capture and Control System

   Performance Standard: Collective facility-wide capture and control efficiency of 67.0% (mass basis) over an entire fermentation season.

4. Level of Stringency: [x] Achieved in Practice
   [ ] Technologically Feasible
   [ ] RACT, BARCT, NSPS, NESHAPS, MACT

5. BACT Selection Process Discussion: The applicant has successfully operated an EcoPAS system at the facility for two fermentation seasons and has established a proven "track-record" of reliability. The District has determined that the EcoPAS emissions control system is an achieved-in-practice BACT technology. Additionally, the USEPA has determined that the EcoPAS capture and control system is considered an achieved-in-practice control technology for wine fermentation. This BACT determination was based on the application materials, the manufacturer's capture and control efficiency guarantee, and prior operational history of these controls at the CCWS facility.

6. BACT Effectiveness: BACT is expected to be effective if the fermentation exhaust flow rate is between 50 and 300 scfm and the pressure in the system does not exceed 5" of water column. Additionally, the manufacturer does not provide a performance guarantee during the first quarter of a fermentation cycle due to the chemical composition of the fermentation exhaust gases during this time. In order to address these specifications, BACT effectiveness will be determined over an entire fermentation season.

7. BACT During Non-Standard Operations: Non-standard operations identified by the applicant are winemaking operations that require the closed tank hatches or manways to be opened. These activities include visual inspections, tank pump-overs, red wine cap breakups, delastage, and wine additions. The time taken to complete these activities shall be minimized per the permit conditions. BACT is not feasible during these non-standard operations since the manifold inlet valve shall be closed prior to commencing these activities. Additionally, BACT is not feasible during tank foam-overs.

8. Operating Constraints: An EcoPAS (or NoMoVo) system must be used to capture and control emissions from all fermentation operations in the tanks subject to this permit. Collectively, the

ATTACHMENT D
BACT Determination

systems must achieve a minimum capture and control efficiency greater than or equal to 67.0% (mass basis) over an entire fermentation season. All manifold piping shall be vapor tight and slope downward to the control system. All condensate collected from an EcoPAS system must be disposed or treated in a District-approved method.

9. Continuously Monitored BACT: CEMS are not required for this project.

10. Source Testing Requirement: There are no source testing requirements for this capture and control equipment. The capture and control efficiency of the EcoPAS system shall be determined using a mass balance approach. Specifically, the amount of ethanol captured and controlled each day will be determined through analysis of the condensate at the end of each 24 hour period. The total daily uncontrolled ethanol emissions will be calculated using District-approved emission factors and calculation methodologies. The daily uncontrolled emissions and amount of ethanol captured will be used to calculate the daily control efficiency. The daily control efficiencies will be averaged over an entire fermentation season to determine compliance with the BACT performance standard.

11. Compliance Averaging Times: The capture and control efficiency shall be based on an entire fermentation season.

12. Multi-Phase Projects: This is not a multi-year project.

13. Referenced Sources: The following sources were reviewed to determine BACT: Application material; EcoPAS manufacturer's capture and control efficiency guarantee; SBCAPCD *Achieved in Practice Determination for Wine Fermentation Emission Control Technologies* Memo; US EPA Region 9 letter to SJVAPCD regarding Bear Creek Winery, CBUS Ops Inc., Delicato Vineyard, and E&J Gallo Winery projects, September 30, 2016; CARB BACT Clearinghouse.

14. PSD BACT: Not Applicable

ATTACHMENT I-1
Fee Statement

FEE STATEMENT
ATC Mod No. 15044 -01
FID: 11042 Central Coast Wine Services / SSID: 10834

Santa Barbara County
Air Pollution Control District

Permit Fee

Admin Change	**$429.00**

Fee Statement Grand Total = $429

Notes:
(1) Fee Schedule Items are listed in District Rule 210, Fee Schedule "A".
(2) The term "Units" refers to the unit of measure defined in the Fee Schedule.