From:	Michael F. Goldman
To:	Gerardo Rios - EPA Region 9; "Yannayon, Laura"
Subject:	CCWS
Date:	Monday, September 18, 2017 8:46:00 AM
Attachments:	ATC Mod 15044-01 - Final.pdf 2017-09-14 Wine Institute"s Petition for Review re ATC 15044 (petition only).pdf

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Hi,

A few items:

- In order to avoid an appeal from CCWS, we issued a permit modification to ATC 15044 that changes the control efficiency averaging time from a rolling 30 day average to an entire fermentation season average. This is actually in line with our overall thinking and does not represent any substantive change in our BACT determination. Averaging is averaging, regarding of the time frame. That permit was issued last Friday. They still have no issues with the BACT determination itself. Copy is attached.

- The Wine Institute filed a permit appeal on Friday. Copy is attached.

Sincerely,

Mike

Michael Goldman, Manager
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