

1 BRIAN S. HAUGHTON (SBN 111709; [bhaughton@bargcoffin.com](mailto:bhaughton@bargcoffin.com))  
2 R. MORGAN GILHULY (SBN 133659; [mgilhuly@bargcoffin.com](mailto:mgilhuly@bargcoffin.com))  
3 DAVID M. METRES (SBN 273081; [dmetres@bargcoffin.com](mailto:dmetres@bargcoffin.com))  
4 BARG COFFIN LEWIS & TRAPP, LLP  
5 600 Montgomery Street, Suite 525  
6 San Francisco, California 94111  
7 Telephone: (415) 228-5400  
8 Facsimile: (415) 228-5450

9 Attorneys for Petitioner  
10 Wine Institute

11 BEFORE THE HEARING BOARD OF THE SANTA BARBARA COUNTY  
12 AIR POLLUTION CONTROL DISTRICT

13 IN RE: PETITION OF WINE  
14 INSTITUTE FOR REVIEW OF ATC  
15 ISSUED TO CENTRAL COAST WINE  
16 SERVICES

17 FINAL AUTHORITY TO CONSTRUCT  
18 15044; FID 11042; SSID 10834.

19 IN RE: PETITION OF WINE  
20 INSTITUTE FOR REVIEW OF ATC  
21 ISSUED TO CENTRAL COAST WINE  
22 SERVICES

23 FINAL AUTHORITY TO CONSTRUCT  
24 MODIFICATION 15044-01; FID 11042;  
25 SSID 10834.

H.B. Case No. 2017-21-AP;  
H.B. Case No. 2017-24-AP

**DOCUMENTARY EVIDENCE IN  
SUPPORT OF PETITIONER WINE  
INSTITUTE'S PETITION FOR REVIEW**

Date: TBD  
Time: TBD  
Place: TBD

<u>Exhibit</u>	<u>Date</u>	<u>Document Title</u>	<u>Bates Stamp</u>
<i>Permitting Docs</i>			
1	2017-04-26	CCWS Authority to Construct Application	WI 0001–WI 0071
2	2016-03-23	CCWS Permit to Operate	WI 0072–WI 0126
3	2017-08-08	CCWS Final Authority to Construct 15044	WI 0127–WI 0253
4	2017-09-15	Modified Authority to Construct 15044-01	WI 0254–WI 0272
5	2017-09-14	Wine Institute’s Petition for Review of Final Authority to Construct 15044	WI 0273–WI 0507
6	2017-10-11	Wine Institute’s Petition for Review of Final Authority to Construct 15044-01	WI 0508–WI 0766
<i>Site-Specific Data</i>			
7	UNK	CCWS Capture and Control Calculations	WI 0767–WI 0776
8	UNK	CCWS Systems’ Days of Operation	WI 0777–WI 0782
<i>Site-Specific Correspondence</i>			
9	2017-03-01	Email from M. Goldman (SBCAPCD) to R. Mather (CCWS) re: Source Testing	WI 0783
10	2017-04-12	Email from D. Briggs (Strange & Assocs.) to K. Brown (SBCAPCD) re: CCWS - Nuts and Bolts	WI 0784–WI 0785
11	2017-05-04	Email from M. Strange to D. Harris (SBCAPCD)	WI 0786

<u>Exhibit</u>	<u>Date</u>	<u>Document Title</u>	<u>Bates Stamp</u>
12	2017-05-08	CCWS Response to SBCAPCD's May 2, 2017 Comment Letter re Application for ATC 15044	WI 0787–WI 0800
13	2017-08-23	Email from D. Harris (SBCAPCD) to A. Verkuylen (NoMoVo) re: Winery BACT Status Update	WI 0801–WI 0802
14	2017-09-05	Email from M. Miller (CCWS) to M. Goldman (SBCAPCD) re: BACT Clarification Letter	WI 0803
15	2017-09-05	Letter from M. Miller (CCWS) to M. Goldman (SBCAPCD) re: BACT Clarification	WI 0804–WI 0805
16	2017-09-08	Email from M. Miller (CCWS) to M. Goldman (SBCAPCD) re: BACT Clarification Letter	WI 0806
17	2017-09-08	Email from M. Goldman (SBCAPCD) to M. Miller (CCWS) re: BACT Clarification Letter	WI 0807–WI 0808
18	2017-09-13	Email from M. Miller (CCWS) to M. Goldman (SBCAPCD) re: BACT Calculation Letter	WI 0809
19	2017-09-13	Letter from M. Miller (CCWS) to M. Goldman (SBCAPCD) re: BACT Calculation, ATC 15044	WI 0810–WI 0811
20	2017-09-14	Email from M. Goldman (SBCAPCD) to M. Strange (Strange & Associates) re: ATC 15044 Modification Cover Letter	WI 0812

<u>Exhibit</u>	<u>Date</u>	<u>Document Title</u>	<u>Bates Stamp</u>
21	2017-09-15	Email from D. Briggs (Strange & Associates) to M. Goldman (SBCAPCD) re: Suggested Revisions to CCWS ATC 15044	WI 0813
22	2017-09-18	Email from Goldman to G. Rios and L. Yannayon (EPA) re: CCWS	WI 0814
<i>Other Correspondence</i>			
23	2015-03-11	Memo from SJVAPCD to D. Warner (Deputy APCO) re: Achieved in Practice Analysis for Emission Control Technologies Used to Control VOC Emissions from Wine Fermentation Tanks	WI 0815–WI 0827
24	2016-05-09	Memo from SJVAPCD to D. Warner (Deputy APCO) re: Achieved in Practice Analysis for Emission Control Technologies Used to Control VOC Emissions from Wine Fermentation Tanks	WI 0828–WI 0840
25	2016-01-21	Letter from M. Goldman (SBCAPCD) to P. Thompson (EcoPAS) re: BACT Determinations	WI 0841–WI 0842
26	2017-01-06	Email from P. Thompson (EcoPAS) to M. Goldman (SBCAPCD) re: EPA Position on Winery VOCs	WI 0843
<i>BACT Analyses from Other Districts</i>			
27	2006-11-15	SJVAPCD ATC Permit No. N-7478-1-1, E&J Gallo Winery	WI 0844–WI 0848

<u>Exhibit</u>	<u>Date</u>	<u>Document Title</u>	<u>Bates Stamp</u>
28	2015-04-08	Top-Down BACT Analysis for Wine Fermentation VOC Emissions for Bear Creek Winery	WI 0849–WI 0874
29	2015-04-08	Top-Down BACT Analysis for Wine Storage VOC Emissions for Bear Creek Winery	WI 0875–WI 0886
30	2015-03-19	Top-Down BACT Analysis for Wine Fermentation VOC Emissions for E & J Gallo Winery	WI 0887–WI 0910
31	2016-10-07	Letter from D. Warner (SJVAPCD) to G. Rios (USEPA) in Response to September 2016 Comments re: District’s Preliminary Decision to Issue Permits	WI 0911–WI 0912
<b><i>District Rules and Policies</i></b>			
32	2016-08-25	District Rule 801	WI 0913–WI 0915
33	2016-08-25	District Rule 802	WI 0916–WI 0922
34	2001-02-28	SBCAPCD Enforcement Policies and Procedures re: Granting Extensions to Administrative Deadlines	WI 0923
35	2006-11-01	SBCAPCD Hearing Board Policies and Procedures	WI 0924–WI 0949
36	2017-02-03	SBCAPCD Policy No. 6100.064.2017 re: BACT	WI 0950–WI 0963
<b><i>Other Air District Rules and Policies</i></b>			
37	2016-12	SCAQMD BACT Guidelines Part A – Policy and Procedures for Major Polluting Facilities	WI 0964–WI 0975

<u>Exhibit</u>	<u>Date</u>	<u>Document Title</u>	<u>Bates Stamp</u>
<i>Wine Fermentation Emission Factors and Analyses</i>			
38	1983	"Modeling and Prediction of Evaporative Ethanol Loss During Wine Fermentation", by L. Williams and R. Boulton	WI 0976–WI 0984
39	1992-03-10	EPA Memo re: VOC Emissions from Wineries	WI 0985–WI 0987
40	1995-10	EPA Emission Factors for Wine	WI 0988–WI 0996
41	2005-03	CARB - Wine Fermentation Emission Factors	WI 0997–WI 1003
42	2015-05-08	SJVAPCD Response to EPA Comments on ATC Project for E & J Gallo Winery, Facility # C-447, Project # C-1133347	WI 1004-WI 1008
<i>Declarations and Associated Exhibits</i>			
43	2018-01-05	Declaration of Steven Branoff in Support of Wine Institute's Petition for Review	WI 1009–WI 1019
44	2018-01-10	Declaration of Christopher Savage in Support of Wine Institute's Petition for Review re: Wine Quality	WI 1020-WI 1029
45	2018-01-10	Declaration of Marianne F. Strange in Support of Wine Institute's Petition for Review	WI 1030-WI 1046
46	2014-05-01	Letter from D. Belliveau (NohBell) to D. Warner (SJVAPCD) re: Public Notice of ATC	WI 1047-WI 1060

<u>Exhibit</u>	<u>Date</u>	<u>Document Title</u>	<u>Bates Stamp</u>
47	2016-07-06	Letter from P. Thompson (EcoPAS) to A. Marjollet (SJVAPCD) re: Comments on Proposed Initial Permit for Project N-1152244	WI 1061-WI 1063

Dated: January 9, 2018

BARG COFFIN LEWIS & TRAPP, LLP

By:

R. MORGAN GILHULY  
Counsel for Wine Institute

**PROOF OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Barg Coffin Lewis & Trapp, LLP, 600 Montgomery Street, Suite 525, San Francisco, California 94111. On January 9, 2018, I served the following document:

**DOCUMENTARY EVIDENCE IN SUPPORT OF PETITIONER WINE INSTITUTE'S  
PETITION FOR REVIEW  
Case Nos. 2017-21-AP, 2017-24-AP**

- ☐ by transmitting via facsimile the document(s) listed above to the fax number set forth below on this date before 5:00 p.m.
- ☒ by causing personal delivery overnight delivery by Federal Express of the document(s) listed above to the person at the address set forth below.
- ☐ by dispatching a messenger from my place of business with instructions to hand-carry the above and make delivery to the following during normal business hours, by leaving a true copy thereof with the person whose name is shown or the person who was apparently in charge of that person's office or residence.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below.
- ☐ by transmitting via email the document(s) listed above to the email address(es) set forth below on this date before 5 p.m.

Sara Hunt  
Clerk of the Hearing Board  
Santa Barbara County Air Pollution Control  
District  
260 North San Antonio Road, Suite A  
Santa Barbara, CA 93110

William Michael Dillon  
County Counsel's Office  
105 E. Anapamu Street  
Santa Barbara, CA 93101

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 9, 2018, at San Francisco, California.

  
\_\_\_\_\_  
Carlotta Datanagan