

June 8, 2018

Tung Le California Air Resources Board P.O. Box 2815 Sacramento, CA 95814

Re: Request for BACT Determination Retraction/Addition

Dear Mr. Le:

On August 17, 2017, the Santa Barbara County Air Pollution Control District (District) submitted two achieved in practice BACT determinations to the state's BACT Clearinghouse related to wine fermentation controls. One determination was for the NoMoVo water scrubber system (<u>https://www.arb.ca.gov/bact/bactnew/determination.php?var=1043</u>) and one was for the EcoPAS glycol chiller condenser system (<u>https://www.arb.ca.gov/bact/bactnew/determination.php?var=1043</u>).

On June 5, 2018, the District revised these achieved in practice BACT determinations to reflect a class and category limitation of closed-top tanks 30,000 gallons or less. As such, the District hereby requests that these existing achieved in practice BACT determinations be removed from the CARB BACT Clearinghouse and the attached BACT determinations be added to the Clearinghouse.

If you have any questions, please contact me at (805) 961-8821 or GoldmanM@sbcapcd.org.

Sincerely,

Michael Goldman, Manager Engineering Division

- enc: ENTRY #1 Revised NoMoVo Achieved in Practice BACT Determination ENTRY #2 - Revised EcoPAS Achieved in Practice BACT Determination
- cc: Morgan Gilhuly, Barg Coffin Lewis & Trapp, LLP David Harris Engr Chron File

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ENTRY #1

CATEGORY

SOURCE CATEGORY: CLASS/CATEGORY: SIC CODE: NAICS CODE: Wine Fermentation Tanks Closed-Top; \leq 30,000 gallons 2084 31213

EMISSION UNIT INFORMATION

MANUFCTURER: TYPE: MODEL: EQUIPEMNT DESCPN: CAPACITY/DIMENSIONS: OPERATING SCHEDULE: FUNCTION OF EQMNT:

VOC LIMIT: VOC LIMIT UNITS: VOC CONTROL METHOD: VOC CONTROL MET DESC: VOC % CONTROL EFF: NohBell Water Scrubber NoMoVo Capture and Control using Water Scrubber 80 gallon Variable (24/7/10) Control ethanol emissions from fermentation process.

67 percent Add-on Water Scrubber 67

PROJECT / PERMIT INFORMATION

APPLICATION/PERMIT No: APP COMPLETE DATE: NEW CONSTRN/MOD: ATC DATE: TECHNOLOGY STATUS: SOURCE TEST AVAILABLE: ST RESULTS: 15044-02 05/11/2017 Modification 08/18/2017 (Modified 06/05/2018) BACT Determination No Control efficiency determined based on total capture and control using mass balance calculations over the entire fermentation season. Collected slurry is analyzed daily for ethanol weight fraction.

FACILITY /DISTRICT INFORMATION

FACILITY NAME: FACILITY ZIP CODE: FACILITY COUNTY: DISTRICT NAME: DISTRICT CONTACT: CONTACT PHONE No: CONTACT E-MAIL: Central Coast Wine Services 93455 Santa Barbara Santa Barbara County APCD David Harris (805) 961-8824 HarrisD@sbcapcd.org

NOTES

This project triggered BACT. District analyses determined that this control system met the criteria for being classified as Achieved in Practice. This is a first generation emission control system for the control of fermentation emissions from a winery.

ENTRY #2

CATEGORY

SOURCE CATEGORY: CLASS/CATEGORY: SIC CODE: NAICS CODE: Wine Fermentation Tanks Closed-Top; \leq 30,000 gallons 2084 31213

EMISSION UNIT INFORMATION

EcoPAS

MANUFCTURER: TYPE: MODEL: EQUIPEMNT DESCPN: CAPACITY/DIMENSIONS: OPERATING SCHEDULE: FUNCTION OF EQMNT:

VOC LIMIT: VOC LIMIT UNITS: VOC CONTROL METHOD: VOC CONTROL MET DESC: VOC % CONTROL EFF: PAS Capture and Control using Glycol Chiller Condenser 350 scfm Variable (24/7/10) Control ethanol emissions from fermentation process.

67 percent Add-on Glycol Chiller Condenser 67

Glycol Chiller Condenser

PROJECT / PERMIT INFORMATION

APPLICATION/PERMIT No: APP COMPLETE DATE: NEW CONSTRN/MOD: ATC DATE: TECHNOLOGY STATUS: SOURCE TEST AVAILABLE: ST RESULTS:

15044-02
05/11/2017
Modification
08/18/2017 (Modified 06/05/2018)
BACT Determination
No
Control efficiency determined based on total capture and control using mass balance calculations over the entire fermentation season.
Collected slurry is analyzed daily for ethanol weight fraction.

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