



October 7, 2016

Gerardo Rios
Chief, Air Permits Office
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios:

This letter is in response to your September 30, 2016, letter which provides comments on the District's preliminary decision to issue permits for four winery permitting projects:

Bear Creek Winery, Project No. N-1153192
CBUS Ops Inc. (dba Woodbridge Winery), Project No. N-1143210
Delicato Vineyards, Project No. N-1152244
E&J Gallo Winery, Project No. N-1142303

EPA has expressed concern about these projects with respect to federal Lowest Achievable Emission Rate (LAER) requirements for new and modified fermentation tanks. While the District believes it has fully demonstrated that each proposal complies with all federal, state and local permitting requirements, it is evident that additional time would be beneficial to allow further discussions on this issue.

As you are aware, the "Enhanced Administrative Requirements" of section 5.9 of District Rule 2201 allow the issuance of an Authority to Construct permit with or without Certificates of Conformity (COCs) with Title V permitting requirements, provided specific administrative steps are taken prior to the issuance. This letter is to inform EPA that the District does not intend to issue COCs for these projects. The intent of this commitment is to allow EPA, the District, and other interested parties to work together to resolve these LAER issues so that the District may issue at a later date each facilities' Title V permit without EPA objection.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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Please call me at (559) 230-6036 if you have any questions or would like to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", with a long horizontal flourish extending to the right.

David Warner
Deputy Air Pollution Control Officer