



Central Coast Wine Services

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Central Coast Wine Services

September 5, 2017

Mr. Michael Goldman
Santa Barbara County
Air Pollution Control District
260 North San Antonio Road
Santa Barbara CA 93110

Subject: Central Coast Wine Services
Authority to Construct 15044

Dear Mr. Goldman:

Central Coast Wine Services (CCWS) has conducted a thorough review of the final Authority to Construct (ATC) 15044 and is writing this letter to confirm our understanding of the achieving the BACT limits during the initial determination period.

During CCWS's pre-application meeting on March 28, 2017, the District informed CCWS that BACT had been achieved in practice and would be applied to the project which included red fermentation in the existing Series 400 tanks. The meeting included a discussion on how the District would work with CCWS in the event that the percent reduction of ethanol documented in ATC 15044 could not be achieved during source compliance demonstration period (SCDP). This concern was raised by CCWS because historically, neither EcoPas nor NoMoVO control devices had been used throughout a complete fermentation cycle. In addition controlling winemaking is a unique situation due in part to the potential of the start and stop of harvest and therefore fermentation; this could pose a problem of achieving a percent control efficiency over a 30 day rolling averaging period. It has been agreed that is a first generation BACT determination and CCWS is requesting that the District works with us to ensure that it is achievable. CCWS also wants to confirm that the District will not take enforcement action and that a clear avenue of modifying BACT and the permit will be available. Although not clearly stated in the ATC, CCWS is documenting in this letter our understanding of the process that was discussed at the pre-application meeting.

In the event that 67% BACT capture and efficiency cannot be met by either control device referenced above;

the District will:

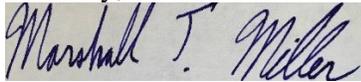
1. not issue a Notice of Violation (NOV),
2. not require a modification to CCWS's historical wine making practices,
3. work with CCWS to revise the BACT determination, and
4. allow a revision to the ATC to adjust to a new control efficiency or if necessary the mathematical methodology used to make the control efficiency determination that is being documented during SCDP.

CCWS will:

1. ensure each control device is properly maintained and operated in accordance with the Manufacture's guidelines,
2. conduct a thorough investigation of the control devices to ensure there are no anomalous conditions present on any individual device, and
3. submit an application to modify the ATC and include documentation describing the steps taken to achieve the capture and control parameter.

CCWS will look forward to meeting with the District on September 6th to discuss this and receive additional guidance from the District to ensure permit compliance.

Sincerely;

A handwritten signature in black ink that reads "Marshall J. Miller". The signature is written in a cursive style and is placed on a light-colored rectangular background.

Marshall Miller
Vice President of Finance & Operations

C: Richard Mather, CCWS
Marianne Strange, MFSA