

**From:** [David Briggs](#)  
**To:** [Michael F. Goldman](#); [Kevin M. Brown](#)  
**Cc:** ["Marianne Strange"](#)  
**Subject:** Suggested Revisions to CCWS ATC 15044  
**Date:** Friday, September 15, 2017 12:26:55 PM  
**Attachments:** [Suggested Revisions to CCWS ATC 15044\\_Rev MFSA.docx](#)

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Mike and Kevin,

We have reviewed the marked up pages from the ACT 15044 document. We would like to provide one comment in advance of our 1:15 call this afternoon.

The equation on the third page of the extracted pages, although correct, appears cumbersome. As our college professors were fond of saying "there is a more elegant way to present it". In the attached version of the suggested changes, we have attempted to present a more elegant presentation of the math.

A couple of notes, there is apparently a conflict between the word programs our two offices are using. If we attempt strike out a the existing formulas, the document will not save (???), therefore the attached document displays both versions of the formula.

The second comment is that we are not trying to move away from doing the daily uncontrolled emission calculation for compliance with the daily emission limit. For this specific equation, the total uncontrolled emissions, whether calculated daily and then summed at the end of the season, or if calculated as a total uncontrolled emission calculation at the end of the season based upon the total wine fermented, will result in the same value in the dominator. However, the second approach allows for a simplified (less complicated?) display of the calculation.

We are not insistent upon this change, we are just presenting it as a suggestion.

Regards,

David