

May 1, 2014

David Warner

Director of Permit Services San Joaquin Valley Air Pollution Control District 1990 E. Gettysburg Avenue Fresno, CA 93726-0244

RE: Public Notice of Authority to Construct

District Facility # N-1237 **Project** # N-1133659

RULE 4694 Evaluation Determination and Achieved in Practice Evaluation

CC Mike Tollstrup, CARB (w/enclosure) via email Gerardo Rios, EPA (s/enclosure) via email

Mr. Warner,

This document is submitted pursuant to the public notice regarding San Joaquin Valley District facility # N-1237 project # N-1133659.

Please accept this letter as an addendum to our original document, we caught one omission between our draft version and our submitted version.

ADDENDUM 1:

Appendix B Page 12

<u>Cost Effectiveness Analysis</u>

E & J Gallo Winery states the fire code requires everything within a 25 foot radius from a control device to meet Class I, Division II Fire Code standards for explosivity The facility has also stated the control devices themselves will need to be cleaned in the event of a foam over These events are infrequent however a CIP system to protect and properly clean and sanitize the control devices must be factored into the analysis

NoMoVo units never exceed the ETOH percentage of the tanks it is connected to, none of these tanks nor ancillary equipment are rated Class I Div II.

NoMoVo Units can self CIP as an included feature. Ancillary hoses can be COP as is customary in wineries on an as needed basis.

Respectfully,

Ad Verkuylen

NohBell Corporation – VP Engineering