

NOTICE PRELIMINARY DECISION OF PART 4, & PART 5, *OFFSETS*, OF DISTRICT RULE 207,
REVIEW OF NEW OR MODIFIED SOURCES (NSR)

Pursuant to District Rule 207, Section 6.9, the Monterey Bay Air Resources District (MBARD) solicits written comments to the preliminary decision to approve the issuance of Authority to Construct (ATC) MOD-26-00009 to Kendall Jackson Wine Estates, LTD dba Jackson Family Wines (facility) for the replacement of the existing Camus natural gas boiler rated at 3 million British thermal units per hour (MMBtu/hr) under Permit to Operate 16018 with a new RBI Futera natural gas boiler rated at 2.5 MMBtu/hr. The equipment is located at their Soledad winery at 37300 Doud Rd in Soledad.

MBARD Rule 207, *Review or New of Modified Sources (NSR)* shall apply to all new stationary sources and all modifications to existing stationary sources which, after construction or modification, emit or have the potential to emit any affected pollutants. The proposed project will result in emissions increase and the project is subject to the requirements of Rule 207.

The facility-wide volatile organic compound (VOC) emissions are greater than or equal to the Offset threshold limits listed for Sections 4.2 and 5.3. As demonstrated in the MBARD's Evaluation Report, the new boiler installation project meets the requirements of Part 4 and Part 5 of Rule 207. Hence, MBARD's preliminary decision to approve the projects is being proposed because the facility has the capability of complying with all applicable MBARD rules and regulations.

The facility's application and MBARD's Evaluation Report are available for public inspection at MBARD's office at 24580 Silver Cloud Court, Monterey, CA. A copy of the evaluation report can be found on MBARD's website at www.mbard.org.

The public has an opportunity to review and comment on the proposed project. Under special circumstances, MBARD may hold a public hearing. Written comments must be submitted to the address below and be postmarked by Friday, June 26, 2026.

Monterey Bay
Air Resources District
24580 Silver Cloud Court
Monterey, CA 93940
(831) 647-9411
ajimenez@mbard.org
Attention: Armando Jimenez

AVISO DECISIÓN PRELIMINAR DE LA PARTE 4 Y LA PARTE 5, *COMPENSACIONES*, DE LA REGLA DE
DISTRITO 207,
REVISIÓN DE FUENTES NUEVAS O MODIFICADAS (NSR)

De conformidad con la Regla 207, Sección 6.9 del Distrito de Recursos del Aire de la Bahía de Monterey (MBARD), se solicitan comentarios por escrito sobre la decisión preliminar de aprobar la emisión de la Autorización para Construir (ATC) MOD-26-00009 a Kendall Jackson Wine Estates, LTD dba Jackson Family Wines (instalación) para el reemplazo de la caldera de gas natural Camus existente, con una capacidad de 3 millones de unidades térmicas británicas por hora (MMBtu/hr), bajo el Permiso de Operación 16018, por una nueva caldera de gas natural RBI Futera con una capacidad de 2.5 MMBtu/hr. El equipo está ubicado en su bodega Soledad, en 37300 Doud Rd en Soledad.

La Regla 207 del MBARD, *Revisión de Fuentes Nuevas Modificadas (NSR)*, se aplicará a todas las fuentes estacionarias nuevas y a todas las modificaciones de fuentes estacionarias existentes que, tras su construcción o modificación, emitan o tengan el potencial de emitir contaminantes. El proyecto propuesto generará un aumento de las emisiones y, por lo tanto, está sujeto a los requisitos de la Regla 207.

Las emisiones de compuestos orgánicos volátiles (COV) de toda la instalación superan o igualan los límites de compensación establecidos en las secciones 4.2 y 5.3. Tal como se demuestra en el Informe de Evaluación de MBARD, el nuevo proyecto de instalación de calderas cumple con los requisitos de las partes 4 y 5 de la Regla 207. Por lo tanto, se propone la decisión preliminar de MBARD de aprobar los proyectos, dado que la instalación tiene la capacidad de cumplir con todas las normas y reglamentos aplicables de MBARD.

La solicitud de la instalación y el informe de evaluación de MBARD están disponibles para consulta pública en la oficina de MBARD, ubicada en 24580 Silver Cloud Court, Monterey, CA. Una copia del informe de evaluación se puede encontrar en el sitio web de MBARD: www.mbard.org.

El público tiene la oportunidad de revisar y comentar el proyecto propuesto. En circunstancias especiales, MBARD podrá celebrar una audiencia pública. Los comentarios por escrito deberán enviarse a la dirección que figura a continuación y tener matasellos a más tardar el viernes 26 de junio de 2026.

Bahía de Monterey
Distrito de Recursos del Aire
24580 Silver Cloud Court
Monterey, CA 93940
(831) 647-9411
ajimenez@mbard.org
Atención: Armando Jiménez



AUTHORITY TO CONSTRUCT

24580 SILVER CLOUD CT., MONTEREY, CA 93940
TELEPHONE (831) 647-9411

MOD-26-00009

LEGAL OWNER OR OPERATOR:	KENDALL JACSON WINE ESTATES, LTD dba JACKSON FAMILY WINES
EQUIPMENT LOCATED AT:	37300 Doud Rd Soledad, CA

THIS AUTHORITY TO CONSTRUCT IS ISSUED AND IS VALID FOR THIS EQUIPMENT ONLY WHILE IT IS IN THE CONFIGURATION SET FORTH IN THE FOLLOWING DESCRIPTION:

REPLACEMENT OF NATURAL GAS BOILER:

Replacement Of Existing Natural Gas Fired Camus Boiler, Model DFN-3000-MHI-SC, Rated At 3.0 MMBtu/Hr With A New RBI Futera Boiler, Model XLF Model MB2500, Serial Number TBD, Natural Gas Fired With A Maximum Heat Input Rating Of 2.5 MMBtu/hr.

THE EQUIPMENT FOR WHICH THIS AUTHORITY TO CONSTRUCT IS ISSUED MAY BE OPERATED ONLY WHEN IN COMPLIANCE WITH THE FOLLOWING CONDITIONS:

Conditions:

1. No later than twenty-four (24) hours prior to start-up of the equipment, the Kendall Jackson Wine Estates, LTD dba Jackson Family Wines must notify the Monterey Bay Air District (MBARD) and arrange for an inspection of the equipment during normal operation to verify compliance with MBARD Rules and Regulations. [Basis: MBARD Rule 207]
2. Annual natural gas fuel usage shall be reported to the MBARD, upon request. [Basis: MBARD Rule 207]
3. The daily natural gas fuel usage from the boiler shall not exceed 600 therms per day or 58,824 cubic feet per day. [Basis: MBARD Rule 207]

** Page 1 of 2 **

THIS AUTHORITY TO CONSTRUCT IS NOT A PERMIT TO OPERATE!

APPROVAL OR DENIAL OF THE APPLICATION FOR PERMIT TO OPERATE THE ABOVE EQUIPMENT WILL BE MADE AFTER AN INSPECTION TO DETERMINE IF THE EQUIPMENT HAS BEEN CONSTRUCTED IN ACCORDANCE WITH THE APPROVED PLANS AND SPECIFICATIONS, AND IF THE EQUIPMENT CAN BE OPERATED IN COMPLIANCE WITH RULES AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT.

PLEASE NOTIFY **ARMANDO JIMENEZ** AT (831) 647-9411 WHEN CONSTRUCTION OF EQUIPEMENT IS COMPLETED. IT IS THE APPLICANT'S RESPONSIBILITY TO COMPLY WITH ALL LAWS, ORDINANCES, AND REGULATIONS OF OTHER GOVERNMENTAL AGENCIES WHICH ARE APPLICABLE TO THE EQUIPMENT CONSTRUCTED.

THIS AUTHORITY TO CONSTRUCT WILL EXPIRE TWO YEARS FROM DATE SHOWN, OR EARLIER, IF ANY CHANGE OF OWNERSHIP, LOCATION, OR MODIFICATION OCCURS.

AIR POLLUTION CONTROL OFFICER

BY: _____

DATE: 5/xx/2026

4. The annual natural gas fuel usage from the boiler shall not exceed 219,000 therms per year or 21,470,760 cubic feet per year. [Basis: MBARD Rule 207]
5. The boiler burner must be in compliance with the following emission requirement: [Basis: MBARD Rule 207]

Pollutant	Emission Limit (ppm @ 3% O ₂)
NO _x	≤ 9
CO	≤ 100

6. The NO_x, CO, and O₂ concentrations in the boiler exhaust discharged to the atmosphere must be measured within 90 days of start-up, using a combustion analyzer to determine compliance with Condition 5. The analyzer must be certified that it has been calibrated within the last six months before the date of use. [Basis: MBARD Rule 207]

Kendall Jackson Wine Estates, LTD dba Jackson Family Wines must notify MBARD no later than twenty-four (24) hours prior to the testing. Written results of the test shall be submitted to MBARD via email to reports@mbard.org within ten (10) days of the test completion.

7. Kendall Jackson Wine Estates, LTD dba Jackson Family Wines shall maintain a log, to record, summarize the monthly natural gas fuel usage (ft³/month) and the volatile organic compound (VOC) monthly emissions. If the unit is not equipped with a dedicated gas meter, fuel used can be based on a maximum fuel usage rate of 2,451 cubic foot per hour (ft³/hr), or a method approved by MBARD. Records shall be retained for at least five (5) years and made readily available to MBARD staff upon request. [Basis: MBARD Rule 207]
8. The sulfur content of any gaseous fuel consumed shall not exceed 50 grains per 100 cubic feet, calculated as hydrogen sulfide at standard conditions. [Basis: MBARD Rule 412]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Ringelmann 1, or equivalent to 20% opacity. [Basis: MBARD Rule 400]
10. No emissions shall constitute a public nuisance.

Note: Upon completion of the equipment modification as specified within this Authority to Construct and demonstration of compliance with applicable MBARD regulations, a Permit to Operate will be issued.

**MONTEREY BAY AIR RESOURCES DISTRICT
EVALUATION REPORT APPLICATION MOD-26-00009**

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

Date: May 2026

APPLICATION RECEIVED FROM:

Kendall Jackson Wine Estates, LTD
dba Jackson Family Wines
37300 Doud Rd
Soledad, CA 93960

PLANT SITE LOCATION:

Address:	UTM Coordinates:	
37300 Doud Rd	651927 m E	Latitude °N: 36.379175°
Soledad, CA	4027338 m N	Longitude °E: -121.306241°

SIC No: 2084 (Wines, Brandy, and Brandy Spirits)
NAISC: 312130 (Wineries)
SCC No.: 10200603 (External Combustion Boilers, Industrial, Natural Gas, <10 MMBtu/hr)

FACILITY CONTACT:

Name: Jorge Leon
Title: Sr. Maintenance Manager
Email: Jorge.Leon@jfwmail.com
Phone: (831) 678-5700

APPLICATION PROCESSED BY:

Armando Jimenez, Air Quality Engineer

AUTHORIZED FOR RELEASE ON:

May 27, 2026

COMMENTS MUST BE POSTMARKED BY:

June 26, 2026

APPROVED FOR RELEASE BY:

Mary Girardo
Mary Girardo
Supervising Air Quality Engineer

May 22, 2026
Date

TABLE OF CONTENTS

PROPOSAL:	5
APPLICABLE RULES:.....	5
EQUIPMENT DESCRIPTION:	5
EMISSIONS CALCULATIONS:	5
RULE COMPLIANCE:	10
CONCLUSIONS:.....	28
RECOMMENDATIONS:	28

LIST OF TABLES

Table 1. RBI Futera XLF MB2500 supplemental information.....	6
Table 2. RBI Futera XLF MB2500 boiler emission factors.....	6
Table 3. New RBI Futera XLF MB2500 potential to emit emissions.	7
Table 4. Post-project RBI boiler PTE emissions in lbs/qtr.	7
Table 5. Post-project RBI boiler PTE emissions in tons per quarter (ton/qtr).....	7
Table 6. Existing 3.0 MMBtu/hr Camus natural gas boiler potential to emit emissions.	8
Table 7. Pre-project Camus natural gas boiler PTE emissions in lbs/qtr.....	8
Table 8. Pre-project Camus natural gas boiler PTE emissions in tons/qtr.....	8
Table 9. Historical fuel usage broken by quarter for the existing Camus natural gas boiler.	8
Table 10. Actual historical emissions on quarterly basis for the Camus natural gas boiler.	9
Table 11. Post-project potential to emit emissions - actual historic emissions in lbs/qtr.	9
Table 12. Post-project potential to emit emissions - actual historic emissions in tons/qtr.	9
Table 13. Post-project – Pre-project potential to emit emissions in lbs/qtr.	9
Table 14. Post-project – Pre-project potential to emit emissions in tons/qtr.	10
Table 15. New Emission Increases – Federal BACT Analysis.....	11
Table 16. Boiler BACT Requirements for units rated $2.0 < \text{MMBtu/hr} < 75$	11
Table 17. California BACT determination.....	12
Table 18. Federal Net Emissions Increase (NEI) – Offset Determination.....	12
Table 19. Federal offset determination $\text{PTE}_{\text{post-project}} - \text{AHE}_{\text{pre-project}}$ for VOCs.....	13
Table 20. Facility-wide VOC emission table from evaluation 16017 & GNR-017062.....	13
Table 21. Updated facility-wide VOC emissions table.....	14
Table 22. Facility-wide potential to emit emissions and CA offset determination.....	14
Table 23. California offset determination $\text{PTE}_{\text{post-project}} - \text{PTE}_{\text{pre-project}}$	15
Table 24. AERMOD Source Pathway inputs.....	15
Table 25. Air Dispersion Modeling (AERMOD) Maximum Concentrations.....	16
Table 26. Boiler PTE emissions.....	16
Table 27. Source effect on ambient Air Quality Standards.	16
Table 28. Proposed project effect on the increment.....	17
Table 29. Facility-wide Potential to Emit Emissions.....	19
Table 30. Facility-wide potential to emit and offset determination.	19
Table 31. Offset determination PTE.	20
Table 32. Facility PTE emissions in tons per year.....	21
Table 33. Billable emissions.	22
Table 34. RBI Futera XLF MB2500 boiler Toxic Air Contaminant emissions.	26
Table 35. Prioritization scores – proximity factor of 0.011.	26

LIST OF FIGURES

Figure 1. Google Earth Pro image.....27

PROPOSAL:

Kendall Jackson Wine Estates, LTD dba Jackson Family Wines (applicant or facility) has submitted a permit application for the replacement of the existing natural gas boiler under Permit to Operate 16018.

The existing natural gas-fired Camus boiler with a maximum heat input capacity of 3.0 million British thermal units per hour (MMBtu/hr) will be replaced with a new smaller RBI hydronic boiler, model Futera XLF MB2500, with a maximum heat input capacity of 2.5 MMBtu/hr.

APPLICABLE RULES:

Rule 200: Permits Required
Rule 201: Sources Not Requiring Permits
Rule 207: Review of New and Modified Stationary Sources
Rule 218: Title V Operating Permits
Rule 221: Federal Prevention of Significant Deterioration
Rule 222: Federal Minor New Source Review
Rule 300: District Fees
Rule 400: Visible Emissions
Rule 402: Nuisance
Rule 403: Particulate Matter
Rule 404: Sulfur Compounds & Nitrogen Oxides
Rule 412: Sulfur Content of Fuels
Rule 413: Removal of Sulfur Compounds
Rule 436: Title V: General Prohibitory Rule
Rule 440: Mineral Processing Facilities
Rule 1000: Toxic Air Contaminants
CA Health & Safety Code, Section 42301.6 – Public Notice
40 CFR Part 60, Subpart Dc, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

EQUIPMENT DESCRIPTION:

REPLACEMENT OF NATURAL GAS BOILER:

Replacement Of Existing Natural Gas Fired Camus Boiler, Model DFN-3000-MHI-SC, Rated At 3.0 MMBtu/Hr With A New RBI Futera Boiler, Model XLF Model MB2500, Serial Number TBD, Natural Gas Fired With A Maximum Heat Input Rating Of 2.5 MMBtu/hr.

EMISSIONS CALCULATIONS:

The boiler supplemental information for the two RBI Futera MW2000 boilers is listed in Table 1. The application has proposed an operating schedule of 24 hours per day (hr/day), 7 days per week (day/week), and 52 weeks per year (week/yr).

Table 1. RBI Futera XLF MB2500 supplemental information.

Individual burner capacity (MMBtu/hr)	2.5
Daily heat input capacity (MMBtu/day)	60
Daily heat input capacity (therm/day)	600
Annual heat input capacity (therm/yr)	219,000
Natural gas heating value ¹ (Btu/ft ³)	1,020
Daily natural gas fuel usage ² (MMft ³ /day)	0.058824
Annual natural gas fuel usage (MMBtu/yr)	21,900.0
Annual natural gas fuel usage (MMft ³ /yr)	21.470760
Total volumetric flow rate (cfm)	625 @ 325°F
Exhaust stack height above ground (feet)	25
Exhaust stack inner diameter (inches)	8

¹ Per EPA AP-42, Chapter 1.4, Natural Gas Combustion, the average gross heating value is approximately 1,020 MMBtu/MMft³.

² Per permit application. Proposed schedule of 24 hours per day (hr/day), and 365 days per year (week/yr). Daily fuel use: (2.5 MMBtu/hr) (MMft³/1,020 MMBtu) (24 hr/day) = 0.058824 MMft³/day.

New Proposed (Post-Project) Potential to Emit (PTE) Emissions

The boiler manufacturer submitted test data conducted for the RBI Futera XLF MB2500 boiler with the NO_x and CO emissions data. The emissions data shows that the NO_x emissions can meet the Best Available Control Technology (BACT) limits for NO_x and CO. The VOC, PM, SO_x, and TOC emission factors are referenced from EPA AP-42 Table 1.4-1 & 1.4-2. Values in lb/MMft³. Table 2 shows the emission factors for the proposed boiler.

Table 2. RBI Futera XLF MB2500 boiler emission factors.

Pollutant	Emission Factor (lb/MMft ³)	Emission Factor (lb/MMBtu)
NO _x ¹	11.118	0.0109
VOC ²	5.5	
CO ¹	75.48	0.074
SO _x ²	0.6	
PM=PM ₁₀ =PM _{2.5} ^{2,3}	7.6	
TOC ²	11	

¹ The NO_x and CO emissions based on the best available control technology (BACT) emissions limit of 9 ppm corrected to 3% O₂ for NO_x and 100 ppm corrected to 3% O₂ for CO. Emission factor estimated as follows:

$$\frac{lb}{MMBtu} = \frac{ppm}{10^6} \times \frac{lbmole}{Molar\ volume, ft^3} \times \frac{Molecular\ weight, lb}{lbmole} \times \frac{Fuel\ factor\ F_d, ft^3}{MMBtu} \times \frac{20.9}{(20.9 - O_2\%)}$$

Where:

$$molar\ volume = \frac{385\ ft^3}{lbmole};\ at\ 1\ atm\ and\ 68^\circ F$$

$$Molecular\ weight = \frac{46.01\ lb}{lbmole}\ for\ NO_x\ and\ \frac{28.01\ lb}{lbmole}\ for\ CO$$

$$Fuel\ factor\ F_d = \frac{8,710\ ft^3}{MMBtu}\ for\ natural\ gas$$

O₂ concentration = 3%; emission factors corrected to 3% O₂

$$\frac{lb\ NO_x}{MMBtu} = \frac{9}{10^6} \times \frac{lbmole}{385\ ft^3} \times \frac{46.01\ lb}{lbmole} \times \frac{8,710\ ft^3}{MMBtu} \times \frac{20.9}{(20.9 - 3)} = \frac{0.0109\ lb}{MMBtu}$$

$$\frac{lb\ CO}{MMBtu} = \frac{100}{10^6} \times \frac{lbmole}{385\ ft^3} \times \frac{28.01\ lb}{lbmole} \times \frac{8,710\ ft^3}{MMBtu} \times \frac{20.9}{(20.9 - 3)} = \frac{0.0740\ lb}{MMBtu}$$

² The VOC, PM, SO_x, and TOC emission factors are referenced from EPA AP-42 Table 1.4-1 & 1.4-2. Values in lb/MMft³.

³ Per CARB's CEIDARS particulate matter size profile database (6/2022), for external combustion boilers, PM = PM₁₀ = PM_{2.5}.

The potential emissions from the new natural gas boiler are shown in Table 3.

Table 3. New RBI Futera XLF MB2500 potential to emit emissions.

Pollutant:	Boiler heat input rate (MMft ³ /day)	Emission factor (lb/MM ft ³)	Daily emissions (lb/day)	Annual emissions ¹ (ton/yr)
NO _x	0.058824	11.118	0.65	0.12
VOC	0.058824	5.5	0.32	0.06
CO	0.058824	75.441	4.44	0.81
SO _x	0.058824	0.6	0.04	0.01
PM	0.058824	7.6	0.45	0.08
TOC	0.058824	11	0.65	0.12

¹ Annual emissions based upon proposed operating schedule of 24 hr/day and 365 day/yr.

Table 4 and Table 5 show the new post-project potential emissions broken down by quarter in pounds per quarter (lbs/qtr) and in tons per year (ton/yr) respectively. The emissions are based on the boiler operating every day in each quarter, which is assessed to be 90 days for quarter 1, 91 days for quarter 2, 92 days for quarter 3, and 92 days for quarter 4.

Table 4. Post-project RBI boiler PTE emissions in lbs/qtr.

Pollutant	Quarter 1 (lbs/qtr)	Quarter 2 (lbs/qtr)	Quarter 3 (lbs/qtr)	Quarter 4 (lbs/qtr)
NO _x	58.50	59.15	59.80	59.80
VOC	28.80	29.12	29.44	29.44
CO	399.60	404.04	408.48	408.48
SO _x	3.60	3.64	3.68	3.68
PM	40.50	40.95	41.40	41.40

Example: Quarter 1 NO_x = (0.65 lb/day) (90 day/Q1) = 58.50 lb/day.

Table 5. Post-project RBI boiler PTE emissions in tons per quarter (ton/qtr).

Pollutant	Quarter 1 (ton/qtr)	Quarter 2 (ton/qtr)	Quarter 3 (ton/qtr)	Quarter 4 (ton/qtr)
NO _x	0.03	0.03	0.03	0.03
VOC	0.01	0.01	0.01	0.01
CO	0.20	0.20	0.20	0.20
SO _x	0.00	0.00	0.00	0.00
PM	0.02	0.02	0.02	0.02

Existing (pre-project) potential to emit (PTE) emissions

The existing Camus natural gas boiler, model DFNH-3000-MHI-SC, was installed in 2014/2015. The PTE emissions for the existing boiler is shown in Table 6 from engineering evaluation 16018.

Table 6 shows the existing potential to emit (PTE) emissions for the existing Camus natural gas boiler, rated at 3.0 MMBtu/hr. The boiler natural gas usage is 0.070588 MMft³/day [(3.0 MMBtu/hr) (MMft³/1,020 MMBtu) (24 hr/day) = 0.070588 MMft³/day] and 25.76462 MMft³/yr.

Table 6. Existing 3.0 MMBtu/hr Camus natural gas boiler potential to emit emissions.

Pollutant:	Boiler heat input rate (MMft ³ /day)	Boiler heat input rate (MMft ³ /yr)	Emission factor (lb/ MMft ³)	Daily emissions (lb/day)	Annual emissions (ton/yr) ¹
NO _x	0.070588	25.764620	11.118	0.78	0.14
VOC	0.070588	25.764620	5.5	0.39	0.07
CO	0.070588	25.764620	84	5.93	1.08
SO _x	0.070588	25.764620	0.6	0.04	0.01
PM	0.070588	25.764620	7.6	0.54	0.10
TOC	0.070588	25.764620	11	0.78	0.14

¹ Annual emissions based upon proposed operating schedule of 24 hr/day and 365 days of operation.

Table 7 and Table 8 show the existing pre-project potential emissions broken down by quarter in pounds per day and in tons per year respectively. The emissions are based on the boiler operating every day in each quarter, which is assessed to be 90 days for quarter 1, 91 days for quarter 2, 92 days for quarter 3, and 92 days for quarter 4.

Table 7. Pre-project Camus natural gas boiler PTE emissions in lbs/qtr.

Pollutant	Quarter 1 (lbs/qtr)	Quarter 2 (lbs/qtr)	Quarter 3 (lbs/qtr)	Quarter 4 (lbs/qtr)
NO _x	70.20	70.98	71.76	71.76
VOC	35.10	35.49	35.88	35.88
CO	533.70	539.63	545.56	545.56
SO _x	3.60	3.64	3.68	3.68
PM	48.60	49.14	49.68	49.68

Table 8. Pre-project Camus natural gas boiler PTE emissions in tons/qtr.

Pollutant	Quarter 1 (ton/qtr)	Quarter 2 (ton/qtr)	Quarter 3 (ton/qtr)	Quarter 4 (ton/qtr)
NO _x	0.04	0.04	0.04	0.04
VOC	0.02	0.02	0.02	0.02
CO	0.27	0.27	0.27	0.27
SO _x	0.00	0.00	0.00	0.00
PM	0.02	0.02	0.02	0.02

Actual Historic Emissions

Table 9 shows the historical natural gas usage broken down by quarter submitted by the facility for the past three years for the existing Camus natural gas boiler.

Table 9. Historical fuel usage broken by quarter for the existing Camus natural gas boiler.

Year	Quarter 1 (MMft ³)	Quarter 2 (MMft ³)	Quarter 3 (MMft ³)	Quarter 4 (MMft ³)
2025	0.516868	0.812577	0.621236	0.961673
2024	0.817547	0.795182	0.387651	0.362802
2023	0.267619	0.267619	0.286816	0.448465
Average	0.534011	0.625126	0.431901	0.590980

Table 10 shows the actual historic emissions (AHE) on a quarterly basis based on the average historic natural gas usage in pounds per quarter.

Table 10. Actual historical emissions on quarterly basis for the Camus natural gas boiler.

Pollutant	Quarter 1 (lbs/qtr)	Quarter 2 (lbs/qtr)	Quarter 3 (lbs/qtr)	Quarter 4 (lbs/qtr)
NO _x	5.94	6.95	4.80	6.57
VOC	2.94	3.44	2.38	3.25
CO	44.86	52.51	36.28	49.64
SO _x	0.32	0.38	0.26	0.35
PM	4.06	4.75	3.28	4.49

Sample calculation for VOC in Quarter 1:

$$VOC \left(\frac{lb}{qtr} \right) = \frac{0.534011 \text{ MMft}^3}{qtr} \times \frac{5.5 \text{ lbVOC}}{\text{MMft}^3} = \frac{2.94 \text{ lbNO}_x}{qtr}$$

Actual Historic Emissions vs New Post-Project Potential Emissions

Table 11 shows the difference between the post project PTE emissions, as shown in Table 4, compared to the actual emissions, as shown in Table 10. The table shows that the post project PTE emissions represent an increase in emissions.

Table 11. Post-project potential to emit emissions - actual historic emissions in lbs/qtr.

Pollutant	Quarter 1 (lbs/qtr)	Quarter 2 (lbs/qtr)	Quarter 3 (lbs/qtr)	Quarter 4 (lbs/qtr)
NO _x	52.56	52.20	55.00	53.23
VOC	25.86	25.68	27.06	26.19
CO	354.74	351.53	372.20	358.84
SO _x	3.28	3.26	3.42	3.33
PM	36.44	36.20	38.12	36.91

Table 12 shows the post-project PTE emissions compared to the actual emissions in tons per quarter.

Table 12. Post-project potential to emit emissions - actual historic emissions in tons/qtr.

Pollutant	Quarter 1 (tons/qtr)	Quarter 2 (tons/qtr)	Quarter 3 (tons/qtr)	Quarter 4 (tons/qtr)
NO _x	0.03	0.03	0.03	0.03
VOC	0.01	0.01	0.01	0.01
CO	0.18	0.18	0.19	0.18
SO _x	0.00	0.00	0.00	0.00
PM	0.02	0.02	0.02	0.02

New (post-project) PTE emissions vs existing (pre-project) PTE emissions

Table 13 shows the new post-project potential emissions, as shown in Table 4, minus the pre-project potential emissions, as shown in Table 7, in lbs/qtr. The table shows that there is no increase in potential emissions for all pollutants.

Table 13. Post-project – Pre-project potential to emit emissions in lbs/qtr.

Pollutant	Quarter 1 (lbs/qtr)	Quarter 2 (lbs/qtr)	Quarter 3 (lbs/qtr)	Quarter 4 (lbs/qtr)
NO _x	-11.70	-11.83	-11.96	-11.96
VOC	-6.30	-6.37	-6.44	-6.44
CO	-134.10	-135.59	-137.08	-137.08
SO _x	0.00	0.00	0.00	0.00
PM	-8.10	-8.19	-8.28	-8.28

Table 14 shows the post-project PTE emissions minus the pre-project potential emissions in tons/qtr.

Table 14. Post-project – Pre-project potential to emit emissions in tons/qtr.

Pollutant	Quarter 1 (tons/qtr)	Quarter 2 (tons/qtr)	Quarter 3 (tons/qtr)	Quarter 4 (tons/qtr)
NO _x	-0.01	-0.01	-0.01	-0.01
VOC	0.00	0.00	0.00	0.00
CO	-0.07	-0.07	-0.07	-0.07
SO _x	0.00	0.00	0.00	0.00
PM	0.00	0.00	0.00	0.00

RULE COMPLIANCE:

The following Monterey Bay Air Resources District (MBARD) rules apply to the operation as specified:

Rule 200 – Permits Required

The purpose of this Rule is to identify when MBARD permits are issued. The provisions of this Rule shall apply to any person who builds, erects, alters, or replaces any article, machine, equipment or other contrivance which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants.

Pursuant to Section 3.1, person shall build, erect, alter, or replace any article, machine, equipment or other contrivance which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants unless the facility owner or operator has obtained a separate written Authority to Construct for each permit unit from the Air Pollution Control Officer. An Authority to Construct shall remain in effect until the Permit to Operate the equipment for which the application was filed is granted or denied or the application is cancelled. Exceptions to MBARD Rule 200 are identified in MBARD Rule 201.

Rule 201 – Sources Not Requiring Permits

The purpose of this Rule is to provide a list of source and equipment categories which are exempt from the requirements of Rule 200 *Permits Required* to obtain an ATC or Permit to Operate (PTO).

Pursuant to Section 4.8.1.1, any steam generator, steam superheater, water boiler, or closed heat transfer system at a stationary source that has an aggregated heat input rate less than 2 MMBtu/hr when fired with natural gas or liquified petroleum gas or any combination thereof is not subject to permitting. The proposed natural gas boiler has a combined heat input rating of 2.5 MMBtu/hr and is subject to permitting.

Rule 207 – Review of New or Modified Sources (as adopted on 4/20/11)

This Rule provides for the review of new and modified stationary air pollution sources to meet requirements for the review of new and modified stationary sources (NSR) and for the Prevention of Significant Deterioration (PSD), under the provisions of the federal Clean Air Act; and requirements for NSR under the provisions of the California Clean Air Act. The intent of this Rule is to ensure that the most stringent requirements of these programs shall be applied.

This Rule shall apply to all new stationary sources and all modifications to existing stationary sources which, after construction or modification, emit or have the potential to emit any affected pollutants. As noted in Table 11 and Table 12 (post-project vs actual historic emissions), the proposed project results in actual emission increases, and the project is subject to the requirements of this Rule.

Federal Best Available Control Technology (BACT) Analysis:

Pursuant to Section 4.1.1, an applicant shall apply BACT to a new stationary source or modification of an existing source, which has the potential to emit greater than or equal to any one of the affected pollutant levels listed in Table 4.1.1 or a modification of an existing stationary source which has the potential to result in a new emissions increase, as defined in Section 2.37, occurring after October 20, 2010 for PM_{2.5} or after August 19, 1983 for PM₁₀ or after July 15, 1976 for any other affected pollutant.

Table 15 shows the controlled emissions from the proposed project, the facility-wide new emissions and the Federal BACT thresholds of Table 4.1.1.

Table 15. New Emission Increases – Federal BACT Analysis

Application no./Equipment Description/Installation Date:	NO _x (lb/day)	VOC (lb/day)	CO (lb/day)	SO _x (lb/day)	PM (lb/day)	PM ₁₀ (lb/day)	PM _{2.5} (lb/day)
10545 Laboratory fume hood ¹ (1998)							
13933 Three-stage nat gas boiler - 4.97 MMBtu/hr ^{2,3} (2008)	18.26	0.65	2.48	0.03	0.52	0.52	NA
15750A Two-stage nat gas boiler - 5.0 MMBtu/hr ² (2023)	1.31	0.65	8.88	0.07	0.90	0.90	0.90
MOD-26-00009/PTO 16018 Nat gas boiler - 2.5 MMBtu/hr ² (2026)	0.65	0.32	4.44	0.04	0.45	0.45	0.45
GNR-0017377 Oak barrel storage & aging (2017)		87.20					
PTO-21-00060A Emerg Tier 3 diesel eng-fire pump - 315 HP ² (2023)	41.10	1.37	7.44	0.08	1.25	1.20	1.17
PTO-25-00056 Fermentation (2017)		235.60					
Total	61.32	325.79	23.24	0.22	3.12	3.07	2.52
Table 4.1.1 Federal BACT Threshold:	150	150	550	150	150	82	54.79

¹ Per evaluation 10545, the laboratory fume hood is for quality analysis and uses acids, no VOC emissions.

² PM₁₀ and PM_{2.5} fractions estimated using CARB’s CEIDARS particulate matter size profile database (updated 6/9/23). For IC engine-diesel (profile #116): PM₁₀ = 0.96 PM & PM_{2.5} = 0.937 PM]. For gas-fired boilers (profile #1101): PM = PM₁₀ = PM_{2.5}.

³ Excludes PM_{2.5} emissions. Permit predates applicability date of October 20, 2010.

Table 15 shows that the new emissions, as defined in Section 2.37, exceed the BACT thresholds of Section 4.1.1 for VOCs. Per MBARD’s *Clarification of Permit Requirements for Gaseous Fired Boilers*, the BACT requirements for gaseous-fired boilers rated at 2.0 < MMBtu/hr < 75 are shown in Table 16. The proposed RBI Futera XLF MB2500 boiler is a watertube type boiler and previous testing has shown that the unit can meet the BACT requirements.

Table 16. Boiler BACT Requirements for units rated 2.0 < MMBtu/hr < 75.

Pollutant	BACT limit (ppm corrected to 3% O ₂)	RBI Futera XLF MB2500 Boiler emissions (ppm corrected to 3% O ₂)
NO _x	≤ 9	≤ 9
CO	≤ 100	≤ 100

California BACT analysis

Pursuant to Section 5.2, BACT shall be required for any new or modified permit unit with a potential to emit 25 pounds per day or more of VOCs or NO_x. Table 17 shows that the proposed project’s uncontrolled emissions do not trigger the CA BACT thresholds.

Table 17. California BACT determination.

Pollutant	BACT threshold (lb/day)	Project uncontrolled emissions (lb/day)	BACT triggered?
NO _x	25	0.65	No
VOC ¹	25	0.32	No

¹ Project emissions from Table 3.

Federal Offsets analysis

Pursuant to Section 4.2, Offsets are required for any new or modified source, which has net emission increases equal to exceeding thresholds specified in Rule 207, Table 4.2.2. The application for the boiler replacement was received in October 2022. Hence, as defined by Section 2.38, this operation is a new source from a federal standpoint, with commencement after July 15, 1976. Accordingly, the project emissions must be counted in the net and new emission increase calculation.

Table 18 shows the emissions from the new project, the net emissions increase for the facility and the Federal offset thresholds.

Table 18. Federal Net Emissions Increase (NEI) – Offset Determination.

Application no./Equipment Description/Installation Date:	NO _x (lb/day)	VOC (lb/day)	CO (lb/day)	SO _x (lb/day)	PM (lb/day)	PM ₁₀ (lb/day)
10545 Laboratory fume hood (1998)						
13933 Three-stage nat gas boiler - 4.97 MMBtu/hr ¹ (2008)	18.26	0.65	2.48	0.03	0.52	0.52
15750A Two-stage nat gas boiler - 5.0 MMBtu/hr ¹ (2023)	1.31	0.65	8.88	0.07	0.90	0.90
MOD-26-00009/PTO 16018 Nat gas boiler - 2.5 MMBtu/hr ¹ (2026)	0.65	0.32	4.44	0.04	0.45	0.45
GNR-0017377 Oak barrel storage & aging (2017)		87.20				
PTO-21-00060A Emerg Tier 3 diesel eng-fire pump - 315 HP ² (2023)						
PTO-25-00056 Fermentation (2017)		235.60				
Total	20.22	324.42	15.80	0.14	1.87	1.87
Table 4.2.2 Offset Threshold:	150	150	550	150	150	82

¹ PM₁₀ and PM_{2.5} fractions estimated using CARB’s CEIDARS particulate matter size profile database (updated 6/9/23). For gas-fired boilers (profile #1101): PM = PM₁₀ = PM_{2.5}.

² Pursuant to Rule 207, Section 1.3.3, the offset requirements of Sections 4.2 and 5.3 shall not apply to any emergency internal combustion engine that is either only used for emergency power when normal power line service fails, or are used only for the emergency pumping of water, and are operated less than 60 hours per year of testing exercise.

Table 18 shows that the facility exceeds the VOC Federal offset threshold of Section 4.2. No other pollutant exceeds their respective threshold levels. Accordingly, the facility is subject to the offset requirements of Section 4.

Pursuant to Section 7.4.1, for increases in emissions the emissions profiles for new sources or modified sources shall be based on the potential to emit and the emissions profiles for existing sources shall be based on the historical emissions. Table 19 shows the comparison of the VOC emissions profile for the proposed project, PTE_{post-project}, and the actual historical emissions of the existing source, AHE_{pre-project}.

Table 19. Federal offset determination PTE_{post-project} – AHE_{pre-project} for VOCs.

Federal Quarterly Profiles	Quarter 1	Quarter 2	Quarter 3	Quarter 4
PTE Post-Project Emissions ¹ :				
RBI XLF MB2500 boiler MOD-26-00061 (lb/qtr)	28.80	29.12	29.44	29.44
AHE Pre-Project Emissions ² :				
Camus 3.0 MMBtu/hr boiler 16018 (lb/qtr)	2.94	3.44	2.38	3.25
PTE _{post-project} – AHE _{pre-project} (lb/qtr):	25.86	25.68	27.06	26.19
PTE _{post-project} – AHE _{pre-project} (ton/qtr):	0.01	0.01	0.01	0.01

¹ The post-project PTE emissions are shown in Table 4 in pounds per quarter.

² The pre-project AHE emissions are shown in Table 10 in pounds per quarter.

Table 19 shows that the VOC emission increases from the proposed modification results in an increase of 0.01 tons for quarter 1, 0.01 tons for quarter 2, 0.01 for quarter 3 and 0.01 for quarter 4. The quarterly VOC emission increases must be offset by emission reductions. MBARD’s Policy for Rounding, dated April 18, 2017, for determining the amount of offsets required in accordance with MBARD Rule 207 is to round up to the tenths place and to the nearest whole number. For example, the given number of decimal places is 0 so a quarterly offset amount of 0.01 tons rounds to 0. Thus, for this project, no offsets are required.

Facility-wide VOC emissions limit

Under the engineering evaluation for applications 16017 (for the wine fermentation) & GNR-017062 (oak barrel aging & storage facility), the facility agreed to a facility-wide VOC annual emissions limit of 24.2 tons per year from sources subject to offset requirements of Rule 207, which exempts emergency diesel engines. Table 20 shows the facility-wide emissions subject to the annual VOC emission limit of 24.2 tons per year as of April 2017.

Table 20. Facility-wide VOC emission table from evaluation 16017 & GNR-017062.

Permit	VOC emissions (ton/yr)
Wastewater Treatment Plant PTO 9224	1.72
Laboratory Fume Hood PTO 10545	0.00
Boiler PTO 13933	0.12
Boiler PTO 15750	0.12
Boiler PTO 16018	0.08
Fermentation Application 16017	11.09
Barrel Storage/Aging Application GNR-017062	11.03
Total emissions	24.16

Since April 2017, the following changes have occurred:

- Cancellation of PTO 9224 for the wastewater treatment plant.
- Modification of PTO 15750 under application MOD-22-00089 for replacement of the boiler. The PTE VOC emissions from the modified equipment remains 0.12 tons of VOC per year.
- Issuance of PTO GNR-0017377 for barrel storage/aging under application GNR-017062. VOC annual PTE emissions are 11.03 tons per year.
- Issuance of PTO-25-00056 for the wine fermentation equipment under application 16017. VOC emissions annual PTE emissions are 11.09 tons per year.
- Proposed modification of PTO 16018 under this application. VOC emissions from new modified boiler are 0.06 tons per year.

Table 21 shows the updated facility-wide VOC emissions table for equipment subject to offset requirements of Rule 207, excludes emergency diesel engine.

Table 21. Updated facility-wide VOC emissions table.

Permit	VOC emissions (ton/yr)
Laboratory Fume Hood PTO 10545	0.00
Boiler PTO 13933	0.12
Boiler PTO 15750A	0.12
Boiler PTO 16018	0.06
Fermentation PTO-25-00056	11.09
Barrel Storage/Aging Application PTO GNR-0017377	11.03
Total emissions	22.43

California Offsets analysis

Pursuant to Section 5.3, any new or modified stationary source with a potential to emit 137 pounds per day or more of VOCs or NO_x shall be required to provide offsets at the ratios specified in Section 4.3. Pursuant to Section 2.38, for the purposes of Part 5 of this Rule, the new source applicability date shall be April 21, 1993. Table 22 shows the facility-wide PTE emissions and the CA offset thresholds of Section 5.3.

Table 22. Facility-wide potential to emit emissions and CA offset determination.

Permit #	NO _x (lb/day)	VOC (lb/day)
10545 Laboratory fume hood (1998)		
13933 Three-stage nat gas boiler - 4.97 MMBtu/hr ¹ (2008)	18.26	0.65
15750A Two-stage nat gas boiler - 5.0 MMBtu/hr ¹ (2023)	1.31	0.65
MOD-26-00009/PTO 16018 Nat gas boiler - 2.5 MMBtu/hr ¹ (2026)	0.65	0.32
GNR-0017377 Oak barrel storage & aging (2017)		87.20
PTO-21-00060A Emerg Tier 3 diesel eng-fire pump - 315 HP ² (2023)		
PTO-25-00056 Fermentation (2017)		235.60
Total	20.22	324.42
Section 5.3 Offset thresholds:	137	137

¹ PM₁₀ and PM_{2.5} fractions estimated using CARB's CEIDARS particulate matter size profile database (updated 6/9/23). For gas-fired boilers (profile #1101): PM = PM₁₀ = PM_{2.5}.

² Pursuant to Rule 207, Section 1.3.3, the offset requirements of Sections 4.2 and 5.3 shall not apply to any emergency internal combustion engine that is either only used for emergency power when normal power line service fails, or are used only for the emergency pumping of water, and are operated less than 60 hours per year of testing exercise.

Table 22 shows that the facility-wide PTE emissions exceed the VOC offset threshold of 137 pounds per day of Section 5.3.

Pursuant to Section 5.3.4, the amount of offsets obtained shall be at least equal to the difference between the emissions of the modified source, and the emissions of the existing source. Pursuant to Section 5.4, for the purposes of determining offset requirements under this Part, emissions profiles for new sources, existing sources or modified sources shall be based on the potential to emit as described under Section 7.1 herein. In addition, Section 5.3.2 requires that the offset shall be determined on a quarterly basis.

Table 23 shows the comparison of the VOC emissions profile for the proposed project, $PTE_{post-project}$, and the PTE emissions of the existing source, $PTE_{pre-project}$. As shown in Table 23, the proposed project results in a PTE emissions decrease and no offsets are required.

Table 23. California offset determination $PTE_{post-project} - PTE_{pre-project}$.

Federal Quarterly Profiles	Quarter 1	Quarter 2	Quarter 3	Quarter 4
PTE Post-Project Emissions¹:				
RBI XLF MB2500 boiler MOD-26-00061 (lb/qtr)	28.80	29.12	29.44	29.44
PTE Pre-Project Emissions²:				
Camus 3.0 MMBtu/hr boiler 16018 (lb/qtr)	35.10	35.49	35.88	35.88
$PTE_{post-project} - AHE_{pre-project}$ (lb/qtr):	-6.30	-6.37	-6.44	-6.44
$PTE_{post-project} - AHE_{pre-project}$ (ton/qtr):	-0.003	-0.003	-0.003	-0.003

¹ The post-project PTE emissions are shown in Table 4 in pounds per quarter.

² The pre-project PTE emissions are shown in Table 7 in pounds per quarter.

Visibility, soils, and vegetation analysis:

Section 3.2 requires the applicant to provide MBARD with an analysis of impairment to visibility, soils and vegetation. MBARD does not find it necessary to determine the negligible effect emissions from this modification will have on visibility, soils and vegetation.

Ambient air quality standards (AAQS) and emission increments:

Section 3.3, Ambient Air Quality Standards and Emission Increments, prohibits emissions from causing or contributing to a violation of an ambient air quality standard or exceeding any air quality increment. Moreover, Section 6.6, Air Quality Increment Analysis, prohibits a source which is subject to Section 4.2, Offset Requirements, from exceeding 50% of the remaining emissions increment.

The proposed boiler has the potential to emit NO_x, VOC, CO, SO_x, PM₁₀, and PM_{2.5}. The proposed units do not emit H₂S, lead, sulfates, or vinyl chloride.

MBARD used the Lakes Environmental AERMOD dispersion model to get the maximum concentration for the boiler. Table 24 shows the source pathway inputs used in the AERMOD model for the boiler.

Table 24. AERMOD Source Pathway inputs.

Source ID ¹	1
Source type ²	Point
X-Coordinate	651927 m

Y-Coordinate	4027338 m
Base elevation ³	206.7 ft
Release height	25 feet
Emissions rate	1 lb/hr
Stack diameter	8 inches
Stack release type	Capped
Gas exit temperature ⁴	325 °F
Gas exit flow rate ⁴	625 cfm
Weather station elevation ⁵ :	22.6 meters

¹ Source ID 1 used for Boiler 1.

² Point source type used since the system has a dedicated stack.

³ Base elevation was uploaded automatically when running AERMAP on AERMOD.

⁴ Per manufacturer specifications for the project.

⁵ Elevation for the Salinas Airport Weather Station. Source: <https://ww2.arb.ca.gov/resources/documents/harp-aermod-meteorological-files>.

Table 25 shows the maximum concentrations from the AERMOD dispersion model. The AERMOD model input files and results are included in Attachment 1.

Table 25. Air Dispersion Modeling (AERMOD) Maximum Concentrations.

Averaging Period	Max Concentration (µg/m ³ / lb/hr)
1-hr	124.22
3-hr	93.84
8-hr	64.25
24-hr	33.20
Annual	4.24

Table 26 shows the emissions from the proposed boiler as shown in Table 3.

Table 26. Boiler PTE emissions.

Pollutant	Boiler PTE emissions (lb/day) ¹	Boiler PTE emissions (lb/hr)
NO _x	0.65	0.027
CO	4.44	0.185
SO _x	0.04	0.002
PM	0.45	0.019

¹ The post-project PTE emissions are shown in Table 3 in pounds per day.

Table 27 shows the effect of the project's PTE emissions, as determined in Table 26, on the Ambient Air quality Standards. The background concentration was obtained from the California Air Resources Board (ARB) Almanac.

Table 27. Source effect on ambient Air Quality Standards.

Pollutant	Averaging period	Source conc. ¹ (µg/m ³)	Background conc. ² (µg/m ³)	Total conc. (µg/m ³)	State standard (µg/m ³)	Federal standard (µg/m ³)	Total exceeds standard?
Nitrogen Dioxide ³ (NO ₂)	1-hr	3.35	54.6	57.95	339	188	No
	Annual	0.11	5.7	5.81	57	100	No

Pollutant	Averaging period	Source conc. ¹ (µg/m ³)	Background conc. ² (µg/m ³)	Total conc. (µg/m ³)	State standard (µg/m ³)	Federal standard (µg/m ³)	Total exceeds standard?
Carbon Monoxide (CO)	1-hr	22.98	1,946.8	1,970.48	23,000	40,000	No
	8-hr	11.89	687.1	699.29	10,000	10,000	No
Sulfur Dioxide ⁴ (SO ₂)	1-hr	0.25	Not available	0.25	655	196	No
	3-hr	0.19	Not available	0.19	None	1,300	No
	24-hr	0.07	Not available	0.07	105	None	No
PM ₁₀	24-hr	0.63	79	79.63	50	150	Yes, State
	Annual	0.08	23.5	23.58	20	None	Yes, State
PM _{2.5}	24-hr	0.63	15	15.63	None	35	No
	Annual	0.08	5.3	5.38	12	12	No

¹ Source concentration = maximum concentration for each averaging period from AERMOD model run from both exhaust stacks multiplied by the emissions increase in g/s.

Example for the 1-hr period: NO_x = (124.22 µg/m³/1 lb/hr) * (0.027 lb/hr) = 3.35 µg/m³.

² Background concentration were retrieved from EPA's Monitor Values Report page: <https://www.epa.gov/outdoor-air-quality-data/monitor-values-report> and CARB's iADAM Air Quality Data Page: <https://www.arb.ca.gov/adam/>.

³ Conservatively assume all NO_x emissions equal to NO₂.

⁴ Conservatively assume all SO_x emissions equal to SO₂.

As shown in Table 27, the PM₁₀ background concentration exceed the state Air Quality Standard. MBARD is currently in nonattainment status for PM₁₀ on both an annual and 24-hour basis for the State. Because the background concentrations for annual PM₁₀ and 24-hour are above the AAQS, all projects emitting PM₁₀ will result in a PM₁₀ concentration exceedance of an AAQS. MBARD has determined that projects will not contribute significantly to an exceedance of the AAQS if the project's contribution is less than 50% of the remaining emissions increment as stipulated in Section 2.5 *Air Quality Increment* of MBARD Rule 207.

Table 28 shows the allowable increment listed in MBARD Rule 207, Section 2.5, Table 2.5.5 and the proposed project's concentration. The table shows that the proposed project is below 50% of the allowable increment in Monterey County. The source concentrations shown in Table 28 are based on the AERMOD modeled max concentrations shown in Table 25 and the boiler PTE emissions shown in Table 3.

Table 28. Proposed project effect on the increment.

Pollutant	Averaging Period	Source Conc. (µg/m ³)	Allowable Increment in Monterey County ¹ (µg/m ³)	50% of Allowable Increment in Monterey County ¹ (µg/m ³)	50% of Allowable Increment Exceeded ²
Nitrogen Dioxide (NO ₂)	Annual	0.11	25	12.50	No
Carbon Monoxide (CO)	1-hr	22.98	12,000	6,000	No
Sulfur Dioxide (SO ₂)	3-hr	0.19	512	256	No
	24-hr	0.07	91	45.5	No
	Annual	0.01	20	10	No

Pollutant	Averaging Period	Source Conc. (µg/m ³)	Allowable Increment in Monterey County ¹ (µg/m ³)	50% of Allowable Increment in Monterey County ¹ (µg/m ³)	50% of Allowable Increment Exceeded ²
PM ₁₀	24-hr	0.63	21.1	10.55	No
	Annual	0.08	10.8	5.40	No
PM _{2.5}	24-hr	0.63	9	4.50	No
	Annual	0.08	4	2.00	No

¹ MBARD Rule 207, Table 2.5.2, Area E, Monterey County other than Areas A, C, & F Impact Zones

² As stated in Section 6.6 of Rule 207 “the District shall not grant a permit to a source which is subject to Section 4.2 herein if its emissions will exceed 50 percent of the remaining emissions increment.”

Publication and Public Comment

MBARD is required, pursuant to Section 6.9, to publish in at least one newspaper of general circulation in MBARD’s jurisdiction a notice stating the preliminary decision on a source’s application for a modification where the offset thresholds of Section 4.2 or 5.3 are exceeded. MBARD will comply with the requirements of Section 6.9 and issue the public notice in a local newspaper and will post the public notice on MBARD’s webpage. The public notice will invite written public comment for a 30-day period following the date of publication.

Rule 207 – Review of New or Modified Sources (as adopted on 2/15/2017)

Note that MBARD has not received approval for the 2/15/2017 version of Rule 207 and MBARD is implementing Rule 207 as adopted on 4/20/2011. For informational purposes only, the Rule applicability of Rule 207 as adopted on 2/15/2017 is as follows:

The purpose of this Rule is to provide for the review of new and modified stationary air pollution sources to meet the New Source Review requirements under the provisions of the California Clean Air Act. This Rule provides mechanisms by which Authorities to Construct may be granted to such sources without interfering with the attainment or maintenance of California ambient air quality standards. Each project subject to New Source Review shall undergo a review under the federal requirements contained within Rule 220 and Rule 221, and a parallel review under the requirements of this Rule and the most stringent applicable provisions shall apply.

Rule 207 applies to all new stationary sources and all modifications to existing stationary sources, which after construction or modification, emit or have the potential to emit any affected pollutants. This project is subject to the requirements of this Rule.

BACT requirements

Pursuant to Section 4.1.1, BACT shall be required for any new or modified permit unit with a potential to emit 25 pounds per day or more of VOCs or NO_x. As shown in Table 17, California BACT determination, the proposed project does not have the potential to exceed 25 pounds per day of VOCs and NO_x.

Pursuant to Section 4.1.2, BACT shall be required for a new or modified stationary source which has the potential to emit greater than or equal to any one of the affected pollutant levels listed in Table 4.1.1.

Table 29 shows the emissions from the new project, the facility-wide emissions and the BACT thresholds of Section 4.1.2, Table 4.1.1.

Table 29. Facility-wide Potential to Emit Emissions.

Application no./Equipment Description/Installation Date:	NO _x (lb/day)	VOC (lb/day)	CO (lb/day)	SO _x (lb/day)	PM (lb/day)	PM ₁₀ (lb/day)	PM _{2.5} (lb/day)
10545 Laboratory fume hood (1998)							
13933 Three-stage nat gas boiler - 4.97 MMBtu/hr ¹ (2008)	18.26	0.65	2.48	0.03	0.52	0.52	0.52
15750A Two-stage nat gas boiler - 5.0 MMBtu/hr ¹ (2023)	1.31	0.65	8.88	0.07	0.90	0.90	0.90
MOD-26-00009/PTO 16018 Nat gas boiler - 2.5 MMBtu/hr ¹ (2026)	0.65	0.32	4.44	0.04	0.45	0.45	0.45
GNR-0017377 Oak barrel storage & aging (2017)		87.20					
PTO-21-00060A Emerg Tier 3 diesel eng-fire pump - 315 HP ¹ (2023)	41.10	1.37	7.44	0.08	1.25	1.20	1.17
PTO-25-00056 Fermentation (2017)		235.60					
Total	61.32	325.79	23.24	0.22	3.12	3.07	3.04
Table 4.1.1 BACT Threshold:	150	150	550	150	150	82	54.79

¹ PM₁₀ and PM_{2.5} fractions estimated using CARB’s CEIDARS particulate matter size profile database (updated 6/9/23). For IC engine-diesel (profile #116): PM₁₀ = 0.96 PM & PM_{2.5} = 0.937 PM]. For gas-fired boilers (profile #1101): PM = PM₁₀ = PM_{2.5}.

Table 29 shows that the new emissions, as defined in Section 2.37, exceed the BACT thresholds of Section 4.1.1 for VOC. Table 16 above shows the BACT requirements from MBARD’s *Clarification of Permit Requirements for Gaseous Fired Boilers* and it shows the proposed natural gas boiler meets the requirements.

Offset requirements

Pursuant Section 4.2, Offsets are required for any new or modified source, which has the potential to emit equal to or greater than the thresholds specified in Rule 207, Table 4.2.1. Table 30 shows the facility wide PTE emissions and the offset thresholds specified in Section 4.2, Table 4.2.1.

Table 30. Facility-wide potential to emit and offset determination.

Application no./Equipment Description/Installation Date:	NO _x (lb/day)	VOC (lb/day)	CO (lb/day)	SO _x (lb/day)	PM (lb/day)	PM ₁₀ (lb/day)
10545 Laboratory fume hood (1998)						
13933 Three-stage nat gas boiler - 4.97 MMBtu/hr ¹ (2008)	18.26	0.65	2.48	0.03	0.52	0.52
15750A Two-stage nat gas boiler - 5.0 MMBtu/hr ¹ (2023)	1.31	0.65	8.88	0.07	0.90	0.90
MOD-26-00009/PTO 16018 Nat gas boiler - 2.5 MMBtu/hr ¹ (2026)	0.65	0.32	4.44	0.04	0.45	0.45

Application no./Equipment Description/Installation Date:	NO _x (lb/day)	VOC (lb/day)	CO (lb/day)	SO _x (lb/day)	PM (lb/day)	PM ₁₀ (lb/day)
GNR-0017377 Oak barrel storage & aging (2017)		87.20				
PTO-21-00060A Emerg Tier 3 diesel eng-fire pump - 315 HP ² (2023)						
PTO-25-00056 Fermentation (2017)		235.60				
Total	20.22	324.42	15.80	0.14	1.87	1.87
Table 4.2.1 Offset Threshold:	137	137	550	150	150	82

¹ PM₁₀ and PM_{2.5} fractions estimated using CARB’s CEIDARS particulate matter size profile database (updated 6/9/23). For gas-fired boilers (profile #1101): PM = PM₁₀ = PM_{2.5}.

² Pursuant to Rule 207, Section 1.3.3, the offset requirements of shall not apply to any emergency internal combustion engine that is either only used for emergency power when normal power line service fails, or are used only for the emergency pumping of water, and are operated less than 60 hours per year of testing exercise.

Table 30 shows the facility exceeds the VOC offset threshold of Section 4.2, Table 4.2.1.

Pursuant to Section 4.2.3, offsets obtained shall be equal to the potential to emit increase from the proposed new source or modification. Table 31 shows the comparison of the VOC emissions profile for the proposed project, PTE_{post-project}, and the PTE emissions of the existing source, PTE_{pre-project}.

Table 31. Offset determination PTE.

Federal Quarterly Profiles	Quarter 1	Quarter 2	Quarter 3	Quarter 4
PTE Post-Project Emissions ¹ :				
RBI XLF MB2500 boiler MOD-26-00061 (lb/qtr)	28.80	29.12	29.44	29.44
PTE Pre-Project Emissions ² :				
Camus 3.0 MMBtu/hr boiler 16018 (lb/qtr)	35.10	35.49	35.88	35.88
PTE _{post-project} – AHE _{pre-project} (lb/qtr):	-6.30	-6.37	-6.44	-6.44
PTE _{post-project} – AHE _{pre-project} (ton/qtr):	-0.003	-0.003	-0.003	-0.003

¹ The post-project PTE emissions are shown in Table 4 in pounds per quarter.

² The pre-project PTE emissions are shown in Table 7 in pounds per quarter.

As shown in Table 31, the project results in a decrease in the VOC PTE emissions.

As pointed out, the Rule as amended on 2/15/2017 has not been approved and the version as adopted on 4/20/2011 will be implemented.

Rule 218 – Title V: Federal Operating Permits

This is the implementing regulation by which MBARD issues the federal Operating Permits. Pursuant to the applicability Section 1.2, the provisions of the Rule apply to:

- Any facility that is a major source; or
- Any acid rain source, as defined by Title IV of the Act; or
- Any solid waste incinerator that must comply with Section 129(e) of the Act; or
- Any other stationary source or category of sources deemed to require a Federal Operating Permit

(FOP) by the United States EPA.

Section 2.18.1 defines a major source as a stationary source or any group of stationary sources as defined above, that directly emits, or has the potential to emit, 100 tons per year or more of any air pollutant except greenhouse gases. The fugitive emissions of a stationary source shall not be considered in determining whether it is a major stationary source for the purpose of Section 302(j) of the Act unless the source belongs to one of the stationary source categories listed in 40 CFR 70.2 “Definitions – Major Source (2)(i-xxvi).

Table 32 shows the facility PTE emissions, which shows the facility PTE emissions do not exceed the major source thresholds.

Table 32. Facility PTE emissions in tons per year.

Application no.:	NO _x (ton/yr)	VOC (ton/yr)	CO (ton/yr)	SO _x (ton/yr)	PM (ton/yr)
10545 Laboratory fume hood (1998)					
13933 Three-stage nat gas boiler - 4.97 MMBtu/hr ¹ (2008)	3.33	0.12	0.45	0.01	0.09
15750A Two-stage nat gas boiler - 5.0 MMBtu/hr ¹ (2023)	0.24	0.12	1.62	0.01	0.16
MOD-26-00009/PTO 16018 Nat gas boiler - 2.5 MMBtu/hr ¹ (2026)	0.12	0.06	0.81	0.01	0.08
GNR-0017377 Oak barrel storage & aging (2017)		11.03			
PTO-21-00060A Emerg Tier 3 diesel eng-fire pump - 315 HP ² (2023)	0.43	0.01	0.08	0.00	0.01
PTO-25-00056 Fermentation (2017)		11.09			
Total	4.12	22.43	2.96	0.03	0.34

¹ Annual emissions based on operating schedule of 24 hours per day & 365 days per year.

² Annual emissions based on 500 hours per year per EPA's Memorandum *Calculating Potential to Emit (PTE) for Emergency Generators* (9/6/1995). [Calculating Potential to Emit \(PTE\) for Emergency Generators](#).

Rule 221 – Federal Prevention of Significant Deterioration

The federal Prevention of Significant Deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant. This Rule provides for the review of new and modified major stationary sources to meet requirements for PSD, under the provisions of the federal Clean Air Act. The purpose of this Rule is to incorporate the federal PSD rule requirements into MBARD’s Rules and Regulations through incorporating the federal requirements by reference.

This Rule shall apply to any source and owner or operator of any source subject to any requirements under Title 40 Code of Federal Regulations, Part 52, Section 21 (40 CFR 52.21), as incorporated into this Rule. The proposed project does not meet the definition of a new major stationary source, or a major modification to an existing stationary source. Since the Prevention of Significant Deterioration (PSD) program only applies to new major stationary sources, or major modifications to stationary sources, this project is not subject to MBARD Rule 221.

Rule 222 – Minor New Source Review

This Rule provides for the review of new and modified stationary air pollution sources to meet the requirements for the review of such sources, under the new source review (NSR) provisions of the federal Clean Air Act. This Rule provides mechanisms by which Authorities to Construct may be granted to such sources without interfering with the attainment or maintenance of ambient air quality standards.

This Rule shall apply to any new or modified stationary source that emits an air pollutant (or its precursors) subject to any National Ambient Air Quality Standard (NAAQS).

Compliance with the New Source Review (NSR) provisions of the California Clean Air Act, as defined in MBARD Rule 207, ensures compliance with MBARD Rule 222, Federal Minor NSR.

Rule 300 – District Fees

This Rule provides the mechanisms for assessing fees for the issuance and renewal of Permits to Operate, Authorities to Construct, and other actions in MBARD's permit system; and to recover MBARD costs for requested services, materials, or equipment. The fees prescribed within this Rule do not exceed the cost of issuing, maintaining, and performing inspection activities pertaining to all permits.

This Rule shall apply to all owners and operators of stationary sources which are required by MBARD Rule 200 *Permits Required* to obtain an Authority to Construct or Permit to Operate; and to requesters of MBARD services, materials, or equipment.

According to MBARD Fee Determination Protocol, affirmed by the Board on 6/16/04, and revised on 8/26/19, the billable emissions shall be based on the 75% of the potential to emit for equipment listed on the permit unless operation is restricted by permit conditions.

Table 33 shows the total emissions from the natural gas boiler. The facility is proposing an operating schedule of 24 hours per day, and 365 days per year for the gas boiler. Thus, the billable emissions are 0.86 tons per year with a corresponding fee code of 502 based on the proposed operating schedule.

Table 33. Billable emissions.

Pollutant	Yearly emissions ¹ (ton/yr)
NO _x	0.12
TOC	0.12
CO	0.81
SO _x	0.01
PM	0.08
PTE Total:	1.14
75% of total	0.86

¹ Based on application's listed operating schedule of 24 hr/day and 365 day/yr.

Rule 400 – Visible Emissions:

The purpose of this Rule is to provide limits for the visible emissions from sources within MBARD. The provisions of this Rule shall apply to all sources of air pollutant emissions in MBARD.

According to MBARD Rule 400 Section 3.1, no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Ringelmann 1, or equivalent 20% opacity. This requirement will be included as a permit condition.

Rule 402 – Nuisance:

The purpose of this Rule is to provide an explicit prohibition against sources creating public nuisances while operating within MBARD. The provisions of this Rule shall apply to all sources of air pollutant emissions within the Air District.

According to MBARD Rule 402, Part 3, no person shall discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health, or safety of any such persons or the public; or which cause, or have a natural tendency to cause, injury or damage to business or property. This requirement will be included as a permit condition.

MBARD Rule 403 – Particulate Matter:

The purpose of this Rule is to provide particulate matter emission limits for sources operating within MBARD. The provisions of this Rule shall apply to any source discharging particulate matter while operating within the Air District.

Pursuant to Section 3.1, a person shall not discharge from any source whatsoever particulate matter in excess of 0.15 grains/ft³. Compliance is assured by the calculation below based on PM hourly emission rate of 0.0188 lb/hr [(0.45 lb/day) ÷ (24 hr/day) = 0.0188 lb/hr] and exhaust flow rate of 625 ft³/min.

$$PM \left(\frac{gr}{ft^3} \right) = \frac{PM, lb}{hr} \times \frac{7,000 gr}{lb} \times \frac{hr}{60 min} \div \frac{exhaust\ flow, ft^3}{min}$$

$$PM \left(\frac{gr}{ft^3} \right) = \frac{0.0188, lb}{hr} \times \frac{7,000 gr}{lb} \times \frac{hr}{60 min} \div \frac{625, ft^3}{min} = \frac{0.0035 gr}{ft^3}$$

MBARD Rule 404 – Sulfur Compounds & Nitrogen Oxides

The purpose of this Rule is to provide limits for the emissions of sulfur compounds, nitrogen oxides and nitrogen dioxide from sources within MBARD. The provisions of this Rule shall apply to sources of sulfur compounds, nitrogen oxides, and nitrogen dioxide subject to MBARD Rule 200 *Permits Required*.

Pursuant to Section 1.3.2, any source subject to an emission limit imposed by BACT requirements of Section 4.1 or 5.2 of MBARD Rule 207 *Review of New or Modified Sources* shall not be subject to Section 3.1 of Rule 404 for the same pollutant. Since the proposed natural gas boiler is subject to BACT for NO_x, the unit is not subject to Sections 3.1.2, 3.1.3 and 3.1.4, which set requirements for NO_x.

Section 3.1 prohibits any single emission unit from exceeding the following concentration or amount at the point of discharge to the atmosphere:

Compliance with the Section 3.1.1 emission limit for sulfur compounds calculated as sulfur dioxide (SO₂), 0.2% by volume (2,000 ppmv) for the boiler is assured based on the SO₂ emissions of 0.0017 lb/hr [(0.04 lb/day ÷ (24 hr/day) = 0.0017 lb/hr] and exhaust flow rate of 47,880 ft³/hr. See calculation below:

$$SO_2(ppm) = \frac{lbSO_2}{hr} \div \left(\frac{DSCFM, ft^3}{hr} \times \frac{MV_{SO_2}, lb}{lbmole} \times \frac{lbmole}{385 ft^3} \right) \times 10^6$$

$$SO_2(ppm) = \frac{0.0017 \text{ lb}}{\text{hr}} \div \left(\frac{37,500 \text{ ft}^3}{\text{hr}} \times \frac{64 \text{ lb}}{\text{lbmole}} \times \frac{\text{lbmole}}{385 \text{ ft}^3} \right) \times 10^6 = 0.273 \text{ ppm}$$

Rule 412 – Sulfur Content of Fuels:

The purpose of this Rule is to limit emissions of sulfur oxides from combustion sources within MBARD. The provisions of this Rule shall apply to all combustion sources operated within the Air District unless exempted pursuant to Section 1.3 of this Rule.

Part 3 requires that no gaseous fuel be burned unless the sulfur content of the fuel is less than 50 grains per 100 cubic feet. The Public Utilities Commission of the State of California has issued General Order 58-A titled “Standards For Gas Service In The State Of California” (latest revision April 12, 1989). Title 7 (Purity of Gas of the General Order specifies hydrogen sulfide and total sulfur standards for any gas supplied by a utility. Section (a) limits hydrogen sulfide to 0.25 grains per 100 standard cubic feet. Accordingly, with the use of utility line natural gas, compliance is expected with this rule.

Rule 413 – Removal of Sulfur Compounds

The provisions of this Rule shall apply to all combustion sources operated within the Air District unless exempted pursuant to Section 1.3. Section 1.3 currently does not list any exemptions.

According to MBARD Rule 413 Part 3, the provisions of MBARD Rule 412 shall not apply where the sulfur compounds are removed pre or post combustion, or where a mixture of fuels is used, so that the resulting emission of sulfur compounds to the atmosphere is no greater than that which would be emitted by using a liquid or solid fuel complying with MBARD Rule 412. Since the fuel is expected to meet the provisions of MBARD Rule 412, the equipment is expected to meet the provisions of MBARD Rule 413.

Rule 436 – Title V: General Prohibitory Rule

The purpose of this Rule is to provide federally enforceable potential to emit limitations limiting emissions below the thresholds requiring federal Title V operating permits under Rule 218.

General Applicability: This Rule shall apply to any stationary source which would, if it did not comply with the limitations set forth in this rule, have the potential to emit air contaminants equal to or in excess of the threshold for a major source of regulated air pollutants or a major source of hazardous air pollutants (HAPs) and which meets one of the following conditions:

- Rule 436, Section 1.2.1: In every 12-month period, the actual emissions of the stationary source are less than or equal to the emission limitations specified in Section 3.1 (shown below); or
 - 50 percent of the major source thresholds for regulated air pollutants (excluding HAPs), or
 - 5 tons per year of a single HAP, or
 - 12.5 tons per year of any combination of HAPs, or
 - 50 percent of any lesser threshold for a single HAP as the U.S. EPA may establish by rule.
- Rule 436, Section 1.2.2: In every 12-month period, at least 90 percent of the emissions from the stationary source are associated with an operation limited by any one of the alternative operational limits specified in Section 6.1.

As shown in Table 32, the facility-wide annual PTE emissions are below the applicability thresholds.

Rule 436 Section 1.3.2.1 allows an exemption from Title V Recordkeeping Requirements of Part 4 if actual

emissions, based on annual renewal information sheets, will not exceed in every 12-month period the following quantities:

- 5 tons per year for regulated (criteria) pollutants;
- 2 tons per year of any single HAP;
- 5 tons per year of any combination of HAPs per year, and
- 20% of any lesser threshold for a single HAP that the EPA may establish by rule.

As shown in Table 32, the facility PTE emissions exceed the criteria pollutant thresholds of Section 1.3.2.1 for VOC. The permit will include recordkeeping requirements to meet the requirements of Rule 436.

Section 5.2 allows an exemption from Title V reporting requirements, if actual emissions, based on annual renewal information sheets, will not exceed in every 12-month period the following quantities:

- 25 tons per year for regulated (criteria) pollutants for which MBARD has federal area designation of attainment, unclassified, transitional or moderate nonattainment.
- 15 tons per year for regulated (criteria) pollutants for which MBARD has federal area designation of serious nonattainment.
- 6.25 tons per year for regulated (criteria) pollutants for which MBARD has federal area designation of severe nonattainment.
- 2.5 tons single Hazardous Air Pollutant (HAP) per year
- 6.25 tons per year of any combination of HAPs per year, or
- 25% of any lesser threshold for a single HAP as the EPA may establish.

As shown in Table 32, the facility-wide PTE emissions are below the thresholds of Section 5.2.

Rule 1000 – Toxic Air Contaminants:

This Rule applies to any new or modified stationary sources for which an Authority to Construct or a Permit to Operate is required pursuant to MBARD Regulation II - Permits, and which has the potential to emit into the atmosphere any TAC. Whenever a potential TAC may be subject to more than one MBARD Rule, or to more than one requirement in this rule, the requirement resulting in the least hazard to the public, as determined by the Air Pollution Control Officer, shall apply.

MBARD Rule 1000 Part 3 requires new or modified sources of toxic air contaminants (TAC) and carcinogenic toxic air contaminants (CATC) to meet the following:

- 3.1.1 The acute hazard index for any target organ or organ system due to TAC emissions from the new or modified permit unit shall not exceed 1.0 at any receptor location;
- 3.1.2 The chronic hazard index for any target organ or organ system due to TAC emissions from the new or modified permit unit shall not exceed 1.0 at any receptor location;
- 3.1.3 The cancer risk due to TAC emissions from the new or modified permit unit shall not exceed 10 in one million at any receptor location.

The TAC emissions for the natural gas boiler were estimated using the San Joaquin Valley Air Pollution Control District (SJVAPCD) SJVAPCD's AB2588 "Hot Spots" Air Toxics Profiles for natural gas external combustion < 10 MMBtu/hr, Toxic Profile #3 (1/6/2023). A copy of SJVAPCD's AB2588 "Hot Spots" Air Toxics Profiles can be found on the following link:

<https://ww2.valleyair.org/permitting/air-toxics-program/resources-for-regulated-facilities/toxic-emissions-inventory-plan/>

Table 34 shows the toxic air contaminant emissions for the new boiler with an operating schedule of 24 hours per day and 365 days per year.

Table 34. RBI Futera XLF MB2500 boiler Toxic Air Contaminant emissions.

Pollutant Name	CAS#	Emission Factor (lb/mmscf)	Fuel Consumption (mmscf/hr)	Fuel Consumption (mmscf/yr)	Max 1-hr emissions (lb/hr)	Annual emissions (lb/yr)
Acetaldehyde	75070	4.30E-03	0.002451	21.470760	1.05E-05	9.23E-02
Acrolein	107028	2.70E-03	0.002451	21.470760	6.62E-06	5.80E-02
Benzene	71432	8.00E-03	0.002451	21.470760	1.96E-05	1.72E-01
Ethyl benzene	100414	9.50E-03	0.002451	21.470760	2.33E-05	2.04E-01
Formaldehyde	50000	1.70E-02	0.002451	21.470760	4.17E-05	3.65E-01
Hexane	110543	6.30E-03	0.002451	21.470760	1.54E-05	1.35E-01
Naphthalene	91203	3.00E-04	0.002451	21.470760	7.35E-07	6.44E-03
PAHs, total, w/o individ. components reported	1151	1.00E-04	0.002451	21.470760	2.45E-07	2.15E-03
Propylene	115071	7.31E-01	0.002451	21.470760	1.79E-03	1.57E+01
Toluene	108883	3.66E-02	0.002451	21.470760	8.97E-05	7.86E-01
Xylenes (mixed)	1330207	2.72E-02	0.002451	21.470760	6.67E-05	5.84E-01

The prioritization score was conducted using SJVAPCD’s Prioritization Calculator (7/29/25). A copy of the calculator can be found on the following link: [prioritization_rmr_2025_uf_use_long.xls](#). The prioritization calculator was updated to include the updated consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values (9/25/25)¹.

Table 35 shows the prioritization scores for the boiler based on an annual operation of 24 hours per day, 365 days per year, and nearest receptor (residential) distance of 555 meters with a receptor proximity factor of 0.011. As shown in the table the chronic and cancer values are less than 1.0. A copy of the prioritization calculator is included in Attachment 2.

Table 35. Prioritization scores – proximity factor of 0.011.

Acute	6.89E-05
Chronic	5.14E-05
Cancer	8.90E-04

Health & Safety Code (H&SC) Section 42301.6 – Public Notification Requirements:

Pursuant to Section §42301.6(a), prior to approving an application for a permit to construct or modify a source that emits hazardous air emissions, and that source is located within 1,000 feet from the outer boundary of a school site, the air pollution control officer shall prepare a public notice in which the proposed project or modification for which the application for a permit is made is fully described. The notice may be prepared whether or not the material is or would be subject to subdivision (a) of Section 25536, if the air

¹ Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values (9/25/2025). Accessed on April 16, 2026. <https://ww2.arb.ca.gov/sites/default/files/classic/toxics/healthval/contable09252025.pdf>

pollution control officer determines and the administering agency concurs that hazardous air emissions of the material may result from an air release, as defined by Section 44303. The notice may be combined with any other notice on the project or permit that is required by law.

MBARD protocol adopted by the board on 11/14/01 specifies the risk thresholds for public notification. If the carcinogenic risk is in excess of 1 in a million or non-carcinogenic risk is at or above the applicable Reference Exposure Levels, MBARD will do the Public Notice.

The project is not located within 1,000 feet of a school as shown in Figure 1.



Figure 1. Google Earth Pro image.

40 CFR Part 60, Subpart Dc, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

The requirements of this Subpart apply to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 100 MMBtu/hr (29 MW) or less, but greater than or equal to 10 MMBtu/hr (2.9 MW). The natural gas-fired boiler has a heat input capacity of 2.5 MMBtu/hr and is exempt from the requirements of this Subpart.

40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

The requirements of this subpart apply to industrial commercial, institutional boiler and process heaters located at major source of hazardous air pollutants (HAP). Kendall Jackson Wine Estates, LTD dba Jackson Family Wines is not a major source of HAP emissions and is exempt from the requirements of this Subpart.

CONCLUSIONS:

The equipment has the capability to comply with all applicable MBARD rules and regulations.

RECOMMENDATIONS:

Issue the Authority to Construct with the following additional conditions:

1. No later than twenty-four (24) hours prior to start-up of the equipment, the Kendall Jackson Wine Estates, LTD dba Jackson Family Wines must notify the Monterey Bay Air District (MBARD) and arrange for an inspection of the equipment during normal operation to verify compliance with MBARD Rules and Regulations. [Basis: MBARD Rule 207]
2. Annual natural gas fuel usage shall be reported to the MBARD, upon request. [Basis: MBARD Rule 207]
3. The daily natural gas fuel usage from the boiler shall not exceed 600 therms per day or 58,824 cubic feet per day. [Basis: MBARD Rule 207]
4. The annual natural gas fuel usage from the boiler shall not exceed 219,000 therms per year or 21,470,760 cubic feet per year. [Basis: MBARD Rule 207]
5. The boiler burner must be in compliance with the following emission requirement: [Basis: MBARD Rule 207]

Pollutant	Emission Limit (ppm @ 3% O ₂)
NO _x	≤ 9
CO	≤ 100

6. The NO_x, CO, and O₂ concentrations in the boiler exhaust discharged to the atmosphere must be measured within 90 days of start-up, using a combustion analyzer to determine compliance with Condition 5. The analyzer must be certified that it has been calibrated within the last six months before the date of use. [Basis: MBARD Rule 207]

Kendall Jackson Wine Estates, LTD dba Jackson Family Wines must notify MBARD no later than twenty-four (24) hours prior to the testing. Written results of the test shall be submitted to MBARD via email to reports@mbard.org within ten (10) days of the test completion.

7. Kendall Jackson Wine Estates, LTD dba Jackson Family Wines shall maintain a log, to record, summarize the monthly natural gas fuel usage (ft³/month) and the volatile organic compound (VOC) monthly emissions. If the unit is not equipped with a dedicated gas meter, fuel used can be based on a maximum fuel usage rate of 2,451 cubic foot per hour (ft³/hr), or a method approved by MBARD. Records shall be retained for at least five (5) years and made readily available to MBARD staff upon request. [Basis: MBARD Rule 207]
8. The sulfur content of any gaseous fuel consumed shall not exceed 50 grains per 100 cubic feet, calculated as hydrogen sulfide at standard conditions. [Basis: MBARD Rule 412]

9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark or darker than Ringelmann 1, or equivalent to 20% opacity. [Basis: MBARD Rule 400]

10. No emissions shall constitute a public nuisance.

Attachment 1:

AERMOD Model Input Files and Results

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** MODEL SETUP OPTIONS SUMMARY ***

** Model Options Selected:

- * Model Allows User-Specified Options
- * Model Is Setup For Calculation of Average CONCentration Values.
- * NO GAS DEPOSITION Data Provided.
- * NO PARTICLE DEPOSITION Data Provided.
- * Model Uses NO DRY DEPLETION. DDPLETE = F
- * Model Uses NO WET DEPLETION. WETDPLT = F
- * Stack-tip Downwash.
- * Model Accounts for ELEVated Terrain Effects.
- * Use Calms Processing Routine.
- * Use Missing Data Processing Routine.
- * No Exponential Decay.
- * Model Uses RURAL Dispersion Only.
- * Option for Capped & Horiz Stacks Selected With:
1 Capped Stack(s); and 0 Horizontal Stack(s)
- * ADJ_U* - Use ADJ_U* option for SBL in AERMET
- * CCVR_Sub - Meteorological data includes CCVR substitutions
- * TEMP_Sub - Meteorological data includes TEMP substitutions
- * Model Assumes No FLAGPOLE Receptor Heights.
- * The User Specified a Pollutant Type of: OTHER

**Model Calculates 4 Short Term Average(s) of: 1-HR 3-HR 8-HR 24-HR
and Calculates ANNUAL Averages

**This Run Includes: 1 Source(s); 1 Source Group(s); and 1137 Receptor(s)

with: 1 POINT(s), including
1 POINTCAP(s) and 0 POINTHOR(s)
and: 0 VOLUME source(s)
and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)
and: 0 SWPOINT source(s)

**Model Set To Continue RUNning After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

**Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor
Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing Hours
b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 22.60 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ; Emission Rate Unit Factor = 0.10000E+07

Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.7 MB of RAM.

**Input Runstream File: aermod.inp

**Output Print File: aermod.out

**Detailed Error/Message File: MOD-26-00009.err

**File for Summary of Results: MOD-26-00009.sum

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: S:\ENG\Permits\Mengmeng_AERMOD_05042020\Weather Data 2019\2015-2019_salinas_u.SF Met Version:
 16216

Profile file: S:\ENG\Permits\Mengmeng_AERMOD_05042020\Weather Data 2019\2015-2019_salinas_u.PF

Surface format: FREE

Profile format: FREE

Surface station no.: 23233

Upper air station no.: 23230

Name: UNKNOWN

Name: OAKLAND/WSO_AP

Year: 2015

Year: 2015

First 24 hours of scalar data

YR MO DY JDY HR H0 U* W* DT/DZ ZICNV ZIMCH M-O LEN Z0 BOWEN ALBEDO REF WS WD HT REF
 TA HT

15	01	01	1	01	-50.8	0.496	-9.000	-9.000	-999.	838.	270.4	0.06	0.83	1.00	6.60	108.	10.0	277.5	2.0
15	01	01	1	02	-46.5	0.454	-9.000	-9.000	-999.	735.	226.3	0.06	0.83	1.00	6.06	103.	10.0	277.0	2.0
15	01	01	1	03	-40.8	0.395	-9.000	-9.000	-999.	599.	171.7	0.06	0.83	1.00	5.31	113.	10.0	275.4	2.0
15	01	01	1	04	-44.5	0.432	-9.000	-9.000	-999.	682.	205.7	0.06	0.83	1.00	5.79	106.	10.0	275.9	2.0
15	01	01	1	05	-48.4	0.469	-9.000	-9.000	-999.	771.	242.1	0.06	0.83	1.00	6.26	108.	10.0	275.4	2.0
15	01	01	1	06	-49.3	0.477	-9.000	-9.000	-999.	790.	250.2	0.06	0.83	1.00	6.36	105.	10.0	274.9	2.0
15	01	01	1	07	-50.9	0.492	-9.000	-9.000	-999.	827.	266.1	0.06	0.83	1.00	6.55	105.	10.0	274.9	2.0
15	01	01	1	08	-52.5	0.511	-9.000	-9.000	-999.	875.	286.9	0.06	0.83	0.72	6.79	100.	10.0	274.9	2.0
15	01	01	1	09	0.1	0.627	0.018	0.013	2.	1189.	-8888.0	0.06	0.83	0.39	8.13	108.	10.0	275.9	2.0
15	01	01	1	10	43.5	0.646	0.759	0.012	365.	1244.	-561.9	0.06	0.83	0.28	8.27	111.	10.0	278.1	2.0
15	01	01	1	11	76.6	0.610	0.941	0.014	395.	1146.	-269.2	0.06	0.83	0.24	7.72	105.	10.0	280.9	2.0
15	01	01	1	12	95.2	0.517	1.041	0.012	431.	902.	-131.6	0.06	0.83	0.22	6.41	110.	10.0	283.8	2.0
15	01	01	1	13	98.0	0.471	1.114	0.010	512.	779.	-96.7	0.06	0.83	0.22	5.77	112.	10.0	284.9	2.0
15	01	01	1	14	85.5	0.380	1.085	0.005	542.	570.	-58.4	0.06	0.83	0.23	4.54	109.	10.0	286.4	2.0
15	01	01	1	15	57.7	0.197	0.963	0.005	561.	240.	-12.0	0.06	0.83	0.26	2.06	100.	10.0	287.0	2.0
15	01	01	1	16	17.3	0.074	0.647	0.005	566.	69.	-2.1	0.07	0.83	0.34	0.57	37.	10.0	287.5	2.0
15	01	01	1	17	-1.5	0.061	-9.000	-9.000	-999.	36.	13.6	0.07	0.83	0.57	0.67	50.	10.0	286.4	2.0
15	01	01	1	18	-4.4	0.090	-9.000	-9.000	-999.	65.	15.1	0.10	0.83	1.00	1.14	17.	10.0	281.4	2.0
15	01	01	1	19	-999.0	-9.000	-9.000	-9.000	-999.	-9999.0	0.11	0.83	1.00	0.00	0.	10.0	280.4	2.0	
15	01	01	1	20	-999.0	-9.000	-9.000	-9.000	-999.	-9999.0	0.11	0.83	1.00	0.00	0.	10.0	278.1	2.0	
15	01	01	1	21	-999.0	-9.000	-9.000	-9.000	-999.	-9999.0	0.11	0.83	1.00	0.00	0.	10.0	277.5	2.0	
15	01	01	1	22	-11.3	0.146	-9.000	-9.000	-999.	134.	24.9	0.12	0.83	1.00	1.76	122.	10.0	277.0	2.0
15	01	01	1	23	-34.5	0.335	-9.000	-9.000	-999.	466.	123.5	0.12	0.83	1.00	3.86	140.	10.0	276.4	2.0
15	01	01	1	24	-15.9	0.169	-9.000	-9.000	-999.	188.	31.3	0.06	0.83	1.00	2.36	110.	10.0	275.4	2.0

First hour of profile data

YR MO DY HR HEIGHT F WDIR WSPD AMB_TMP sigmaA sigmaW sigmaV

15 01 01 01 10.0 1 108. 6.60 277.6 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID AVERAGE CONC NETWORK
RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID

ALL	1ST HIGHEST VALUE IS	4.24200 AT (651838.66, 4027411.62, 65.09, 65.09, 0.00)	DC
	2ND HIGHEST VALUE IS	4.14265 AT (651821.58, 4027395.38, 65.39, 65.39, 0.00)	DC
	3RD HIGHEST VALUE IS	3.92002 AT (651827.00, 4027413.00, 65.20, 65.20, 0.00)	DC
	4TH HIGHEST VALUE IS	3.70876 AT (651804.50, 4027379.15, 65.43, 65.43, 0.00)	DC
	5TH HIGHEST VALUE IS	3.70683 AT (651802.00, 4027388.00, 65.73, 65.73, 0.00)	DC
	6TH HIGHEST VALUE IS	3.48626 AT (651855.74, 4027427.85, 65.05, 65.05, 0.00)	DC
	7TH HIGHEST VALUE IS	3.37174 AT (651802.00, 4027413.00, 66.00, 66.00, 0.00)	DC
	8TH HIGHEST VALUE IS	3.21346 AT (651827.00, 4027438.00, 65.51, 65.51, 0.00)	DC
	9TH HIGHEST VALUE IS	3.05369 AT (651777.00, 4027388.00, 65.96, 65.96, 0.00)	DC
	10TH HIGHEST VALUE IS	3.00642 AT (651852.00, 4027438.00, 65.39, 65.39, 0.00)	DC

*** RECEPTOR TYPES: GC = GRIDCART

GP = GRIDPOLR

DC = DISCCART

DP = DISCPOLR

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\MOD-26-00009\MOD-26-00009.isc ***
05/05/26

*** AERMET - VERSION 16216 *** *** 13:55:18

PAGE 5

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	DATE	NETWORK
TYPE GRID-ID	AVERAGE CONC (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF

ALL HIGH 1ST HIGH VALUE IS 124.22477 ON 15011906: AT (651852.00, 4027438.00, 65.39, 65.39, 0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\MOD-26-00009\MOD-26-00009.isc ***
05/05/26

*** AERMET - VERSION 16216 *** *** 13:55:18

PAGE 6

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** THE SUMMARY OF HIGHEST 3-HR RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	DATE	NETWORK
TYPE GRID-ID	AVERAGE CONC (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF

ALL HIGH 1ST HIGH VALUE IS 93.84481 ON 19121603: AT (651855.74, 4027427.85, 65.05, 65.05, 0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\MOD-26-00009\MOD-26-00009.isc ***
05/05/26

*** AERMET - VERSION 16216 *** *** 13:55:18

PAGE 7

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** THE SUMMARY OF HIGHEST 8-HR RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	DATE	NETWORK
TYPE GRID-ID	AVERAGE CONC (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF

ALL HIGH 1ST HIGH VALUE IS 64.24652 ON 18122408: AT (651855.74, 4027427.85, 65.05, 65.05, 0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** AERMOD - VERSION 24142 *** *** C:\Lakes\AERMOD View\MOD-26-00009\MOD-26-00009.isc ***
05/05/26

*** AERMET - VERSION 16216 *** *** 13:55:18

PAGE 8

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** THE SUMMARY OF HIGHEST 24-HR RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	DATE	NETWORK
TYPE GRID-ID	AVERAGE CONC (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF

ALL HIGH 1ST HIGH VALUE IS 33.19624 ON 19012324: AT (651838.66, 4027411.62, 65.09, 65.09, 0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** MODELOPTs: CONC ELEV RURAL ADJ_U*

*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 571 Warning Message(s)
A Total of 817 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 331 Calm Hours Identified

A Total of 486 Missing Hours Identified (1.11 Percent)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****

ME W186	99	MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used	0.50
ME W187	99	MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET	
CN W734	21	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015010121
CN W733	24	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015010124
CN W734	669	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015012821
CN W734	813	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015020321
CN W734	1356	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015022612
CN W734	1359	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015022615
CN W733	1360	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015022616
CN W734	1362	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015022618
CN W732	1368	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2015022624
CN W734	1416	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015022824
CN W734	1752	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015031424
CN W734	1953	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015032309
CN W734	1956	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015032312
CN W734	3177	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015051309
CN W734	3513	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015052709
CN W734	3561	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015052909
CN W734	3651	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015060203
CN W734	3654	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015060206
CN W733	3656	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015060208
CN W734	4068	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015061912
CN W734	4137	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015062209
CN W734	4161	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015062309
CN W734	4164	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015062312
CN W734	4167	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015062315
CN W733	4168	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015062316
CN W734	4170	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015062318
CN W734	4173	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015062321
CN W733	4176	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015062324
CN W732	4176	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2015062324
CN W734	4704	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015071524
CN W734	4926	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015072506
CN W734	5094	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015080106
CN W734	5355	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015081203
CN W734	5358	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015081206

CN W733	5360	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015081208
CN W734	5361	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015081209
CN W734	5454	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015081606
CN W733	5456	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015081608
CN W734	5457	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015081609
CN W734	5460	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015081612
CN W732	5472	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2015081624
CN W734	5646	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015082406
CN W734	6009	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015090809
CN W734	6012	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015090812
CN W734	6015	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015090815
CN W733	6016	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015090816
CN W734	6018	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015090818
CN W732	6024	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2015090824
CN W734	6216	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015091624
CN W734	6219	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015091703
CN W734	6771	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015101003
CN W734	7233	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015102909
CN W734	7236	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015102912
CN W734	7632	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015111424
CN W734	7752	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015111924
CN W734	7755	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015112003
CN W734	7764	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015112012
CN W734	7773	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015112021
CN W734	8052	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015120212
CN W734	8133	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015120521
CN W734	8136	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015120524
CN W734	8142	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015120606
CN W734	8517	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015122121
CN W734	8754	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015123118
CN W734	8757	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015123121
CN W734	8760	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2015123124
CN W733	8760	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2015123124
CN W732	8760	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2015123124
CN W734	9018	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016011118
CN W734	9021	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016011121
CN W734	9024	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016011124
CN W733	9024	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016011124
CN W734	9045	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016011221
CN W734	9072	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016011324
CN W734	9075	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016011403
CN W734	9078	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016011406
CN W733	9080	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016011408
CN W734	9378	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016012618
CN W734	9381	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016012621
CN W734	9621	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016020521
CN W734	9624	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016020524
CN W734	10137	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016022709
CN W734	10140	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016022712
CN W734	10260	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016030312
CN W734	10617	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016031809
CN W734	10620	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016031812
CN W733	10624	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016031816
CN W734	10875	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016032903
CN W734	10878	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016032906
CN W733	10880	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016032908
CN W734	11142	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016040906
CN W734	11211	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016041203
CN W734	11214	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016041206
CN W733	11216	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016041208
CN W734	11256	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016041324
CN W734	11259	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016041403

CN W734	11289	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016041509
CN W734	11376	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016041824
CN W734	11400	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016041924
CN W734	11472	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016042224
CN W733	11472	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016042224
CN W734	11475	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016042303
CN W734	11526	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016042506
CN W734	11673	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050109
CN W734	11676	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050112
CN W734	11679	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050115
CN W733	11680	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016050116
CN W734	11682	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050118
CN W732	11688	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2016050124
CN W734	11697	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050209
CN W734	11700	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050212
CN W734	11784	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050524
CN W734	11790	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050606
CN W734	11835	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016050803
CN W734	11886	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051006
CN W734	11889	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051009
CN W734	11892	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051012
CN W734	11907	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051103
CN W734	11910	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051106
CN W733	11912	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016051108
CN W734	11913	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051109
CN W734	11958	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051306
CN W734	11985	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051409
CN W734	12072	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051724
CN W734	12075	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051803
CN W734	12078	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051806
CN W733	12080	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016051808
CN W734	12081	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016051809
CN W734	12678	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016061206
CN W733	12680	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016061208
CN W734	12681	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016061209
CN W734	12684	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016061212
CN W734	12687	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016061215
CN W733	12688	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016061216
CN W734	12690	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016061218
CN W732	12696	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2016061224
CN W734	12966	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016062406
CN W734	13185	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016070309
CN W734	13350	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016071006
CN W734	13491	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016071603
CN W733	13496	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016071608
CN W734	13497	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016071609
CN W734	13878	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016080106
CN W734	13881	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016080109
CN W734	13899	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016080203
CN W734	13902	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016080206
CN W733	13904	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016080208
CN W734	13905	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016080209
CN W734	13923	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016080303
CN W734	13956	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016080412
CN W734	14097	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081009
CN W734	14100	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081012
CN W734	14103	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081015
CN W733	14104	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016081016
CN W734	14106	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081018
CN W732	14112	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2016081024
CN W734	14193	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081409
CN W734	14196	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081412

CN W734	14199	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081415
CN W733	14200	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016081416
CN W734	14202	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016081418
CN W732	14208	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2016081424
CN W734	14952	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016091424
CN W734	14955	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016091503
CN W734	16323	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016111103
CN W734	16326	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016111106
CN W733	16328	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016111108
CN W734	16368	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016111224
CN W734	16374	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016111306
CN W734	16416	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016111424
CN W734	16419	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016111503
CN W734	16929	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016120609
CN W734	16932	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016120612
CN W734	17469	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016122821
CN W734	17538	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016123118
CN W734	17541	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016123121
CN W734	17544	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2016123124
CN W733	17544	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2016123124
CN W732	17544	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2016123124
CN W734	17547	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017010103
CN W734	17583	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017010215
CN W734	17697	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017010709
CN W734	17700	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017010712
CN W734	17703	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017010715
CN W733	17704	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017010716
CN W734	17706	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017010718
CN W732	17712	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017010724
CN W734	17775	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017011015
CN W734	18150	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017012606
CN W734	18393	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017020509
CN W734	18396	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017020512
CN W734	18399	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017020515
CN W733	18400	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017020516
CN W734	18402	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017020518
CN W732	18408	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017020524
CN W734	18765	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017022021
CN W734	18885	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017022521
CN W734	18888	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017022524
CN W734	19041	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017030409
CN W734	19044	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017030412
CN W734	19047	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017030415
CN W733	19048	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017030416
CN W734	19050	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017030418
CN W732	19056	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017030424
CN W734	19491	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017032303
CN W734	19494	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017032306
CN W733	19496	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017032308
CN W734	19497	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017032309
CN W734	19563	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017032603
CN W734	19566	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017032606
CN W733	19568	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017032608
CN W734	19569	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017032609
CN W734	19572	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017032612
CN W733	19576	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017032616
CN W732	19584	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017032624
CN W734	19734	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017040206
CN W734	19737	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017040209
CN W734	19761	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017040309
CN W734	19881	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017040809
CN W734	19884	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017040812

CN W734	19887	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017040815
CN W733	19888	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017040816
CN W734	19890	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017040818
CN W732	19896	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017040824
CN W734	20073	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017041609
CN W734	20076	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017041612
CN W734	20079	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017041615
CN W733	20080	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017041616
CN W734	20082	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017041618
CN W732	20088	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017041624
CN W734	20184	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017042024
CN W734	20187	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017042103
CN W734	20190	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017042106
CN W733	20192	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017042108
CN W734	20193	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017042109
CN W734	20196	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017042112
CN W734	20199	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017042115
CN W733	20200	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017042116
CN W734	20202	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017042118
CN W732	20208	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017042124
CN W734	20499	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017050403
CN W734	20502	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017050406
CN W733	20504	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017050408
CN W734	20889	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017052009
CN W734	20892	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017052012
CN W734	20895	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017052015
CN W733	20896	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017052016
CN W734	20898	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017052018
CN W732	20904	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017052024
CN W734	20931	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017052203
CN W733	20936	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017052208
CN W734	21174	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060106
CN W733	21176	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017060108
CN W734	21177	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060109
CN W734	21180	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060112
CN W734	21183	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060115
CN W733	21184	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017060116
CN W734	21186	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060118
CN W734	21189	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060121
CN W733	21192	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017060124
CN W732	21192	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017060124
CN W734	21366	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060906
CN W733	21368	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017060908
CN W734	21369	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060909
CN W734	21372	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060912
CN W734	21375	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060915
CN W733	21376	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017060916
CN W734	21378	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060918
CN W734	21381	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017060921
CN W733	21384	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017060924
CN W732	21384	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017060924
CN W734	21753	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017062509
CN W734	21756	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017062512
CN W734	21759	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017062515
CN W733	21760	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017062516
CN W734	21762	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017062518
CN W734	21765	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017062521
CN W733	21768	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017062524
CN W732	21768	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017062524
CN W734	23484	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017090512
CN W734	23487	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017090515
CN W733	23488	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017090516

CN W734	23490	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017090518
CN W732	23496	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017090524
CN W734	24081	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017093009
CN W734	24084	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017093012
CN W734	24087	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017093015
CN W733	24088	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017093016
CN W734	24090	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017093018
CN W732	24096	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017093024
CN W734	24417	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101409
CN W734	24420	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101412
CN W734	24423	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101415
CN W733	24424	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017101416
CN W734	24426	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101418
CN W732	24432	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017101424
CN W734	24441	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101509
CN W734	24444	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101512
CN W734	24447	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101515
CN W733	24448	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017101516
CN W734	24450	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017101518
CN W732	24456	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017101524
CN W734	25161	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017111409
CN W734	25164	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017111412
CN W734	25167	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017111415
CN W733	25168	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017111416
CN W734	25170	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017111418
CN W732	25176	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017111424
CN W734	25245	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017111721
CN W734	25248	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017111724
CN W733	25248	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017111724
CN W734	25251	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017111803
CN W734	25593	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017120209
CN W734	25596	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017120212
CN W734	25599	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017120215
CN W733	25600	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017120216
CN W734	25602	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017120218
CN W732	25608	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017120224
CN W734	25638	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017120406
CN W734	25641	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017120409
CN W734	25797	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017121021
CN W734	25800	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017121024
CN W733	25800	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017121024
CN W734	25929	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017121609
CN W734	25932	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017121612
CN W734	25935	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017121615
CN W733	25936	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017121616
CN W734	25938	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017121618
CN W732	25944	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017121624
CN W734	26298	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017123118
CN W734	26301	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017123121
CN W734	26304	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2017123124
CN W733	26304	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2017123124
CN W732	26304	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2017123124
CN W734	26445	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018010621
CN W734	27033	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018013109
CN W734	27036	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018013112
CN W734	27039	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018013115
CN W733	27040	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018013116
CN W734	27042	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018013118
CN W732	27048	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018013124
CN W734	27582	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018022306
CN W734	27585	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018022309
CN W734	27588	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018022312

CN W734	27630	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018022506
CN W734	27633	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018022509
CN W734	27636	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018022512
CN W733	27640	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018022516
CN W734	28353	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018032709
CN W734	28356	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018032712
CN W734	28359	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018032715
CN W733	28360	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018032716
CN W734	28362	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018032718
CN W732	28368	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018032724
CN W734	29412	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051012
CN W734	29415	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051015
CN W733	29416	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018051016
CN W734	29418	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051018
CN W732	29424	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018051024
CN W734	29514	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051418
CN W734	29517	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051421
CN W734	29520	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051424
CN W733	29520	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018051424
CN W732	29520	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018051424
CN W734	29523	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051503
CN W734	29526	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051506
CN W733	29528	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018051508
CN W734	29529	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051509
CN W734	29532	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051512
CN W733	29536	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018051516
CN W734	29538	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051518
CN W734	29541	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051521
CN W734	29544	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051524
CN W733	29544	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018051524
CN W732	29544	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018051524
CN W734	29547	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051603
CN W734	29550	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051606
CN W733	29552	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018051608
CN W734	29553	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051609
CN W734	29556	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051612
CN W732	29568	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018051624
CN W734	29580	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018051712
CN W734	30849	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018070909
CN W734	30852	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018070912
CN W734	30855	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018070915
CN W733	30856	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018070916
CN W734	30858	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018070918
CN W734	30861	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018070921
CN W733	30864	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018070924
CN W732	30864	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018070924
CN W734	31233	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018072509
CN W734	31518	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018080606
CN W733	31520	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018080608
CN W734	31521	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018080609
CN W734	31761	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018081609
CN W734	31788	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018081712
CN W734	31827	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018081903
CN W733	31832	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018081908
CN W734	32025	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018082709
CN W734	32028	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018082712
CN W734	32184	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018090224
CN W734	32187	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018090303
CN W734	32661	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018092221
CN W734	32664	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018092224
CN W734	32667	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018092303
CN W734	32670	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018092306

CN W733 32672	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018092308
CN W734 32742	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018092606
CN W734 32745	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018092609
CN W734 33003	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018100703
CN W734 33033	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018100809
CN W734 33036	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018100812
CN W734 33039	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018100815
CN W733 33040	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018100816
CN W734 33042	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018100818
CN W732 33048	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018100824
CN W734 33195	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018101503
CN W734 33336	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018102024
CN W734 33339	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018102103
CN W734 33342	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018102106
CN W733 33344	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018102108
CN W734 33345	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018102109
CN W734 33348	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018102112
CN W732 33360	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018102124
CN W734 33612	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018110112
CN W734 33615	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018110115
CN W734 33645	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018110221
CN W734 33648	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018110224
CN W733 33648	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018110224
CN W734 33666	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018110318
CN W734 33669	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018110321
CN W734 33672	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018110324
CN W733 33672	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018110324
CN W734 33855	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018111115
CN W733 33856	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018111116
CN W734 33858	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018111118
CN W734 33861	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018111121
CN W734 33933	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018111421
CN W734 33936	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018111424
CN W733 33936	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018111424
CN W734 34077	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018112021
CN W734 34080	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018112024
CN W734 34200	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018112524
CN W734 34542	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018121006
CN W734 34545	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018121009
CN W734 34548	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018121012
CN W733 34552	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018121016
CN W734 34944	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018122624
CN W734 34947	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018122703
CN W734 34950	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018122706
CN W733 34952	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018122708
CN W734 35058	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018123118
CN W734 35061	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018123121
CN W734 35064	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2018123124
CN W733 35064	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2018123124
CN W732 35064	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2018123124
CN W734 35373	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019011321
CN W734 36165	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019021521
CN W734 36486	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030106
CN W734 36531	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030303
CN W734 36534	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030306
CN W733 36536	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019030308
CN W734 36561	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030409
CN W734 36576	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030424
CN W734 36585	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030509
CN W734 36627	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030703
CN W734 36630	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030706
CN W733 36632	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019030708

CN W734	36633	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030709
CN W734	36672	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019030824
CN W734	36726	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019031106
CN W734	36729	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019031109
CN W734	36732	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019031112
CN W734	36750	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019031206
CN W734	36804	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019031412
CN W734	37128	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019032724
CN W734	37131	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019032803
CN W734	37161	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019032909
CN W734	37182	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019033006
CN W734	37185	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019033009
CN W734	37203	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019033103
CN W734	37209	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019033109
CN W734	37212	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019033112
CN W734	37215	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019033115
CN W733	37216	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019033116
CN W734	37218	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019033118
CN W732	37224	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2019033124
CN W734	37281	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019040309
CN W734	37344	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019040524
CN W733	37344	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019040524
CN W734	37347	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019040603
CN W734	37374	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019040706
CN W734	37395	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019040803
CN W734	37545	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019041409
CN W734	37581	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019041521
CN W734	37614	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019041706
CN W734	37632	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019041724
CN W734	37668	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019041912
CN W734	37755	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019042303
CN W734	37779	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019042403
CN W734	37785	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019042409
CN W734	37806	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019042506
CN W734	37899	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019042903
CN W734	37902	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019042906
CN W733	37904	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019042908
CN W734	38631	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019052915
CN W733	38632	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019052916
CN W734	38634	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019052918
CN W734	39534	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019070606
CN W734	39540	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019070612
CN W734	39630	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019071006
CN W733	39632	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019071008
CN W734	39633	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019071009
CN W734	40902	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019090106
CN W733	40904	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019090108
CN W734	40905	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019090109
CN W734	40929	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019090209
CN W734	40932	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019090212
CN W734	41205	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091321
CN W734	41208	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091324
CN W733	41208	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019091324
CN W734	41211	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091403
CN W734	41214	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091406
CN W733	41216	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019091408
CN W734	41217	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091409
CN W732	41232	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2019091424
CN W734	41238	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091506
CN W733	41240	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019091508
CN W734	41241	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091509
CN W734	41265	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019091609

CN W734	41931	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019101403
CN W734	41940	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019101412
CN W734	41949	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019101421
CN W734	42300	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019102912
CN W734	42741	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019111621
CN W734	42888	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019112224
CN W734	42891	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019112303
CN W734	42900	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019112312
CN W734	42903	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019112315
CN W733	42904	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019112316
CN W734	42909	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019112321
CN W732	42912	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2019112324
CN W734	42963	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019112603
CN W733	42968	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019112608
CN W734	43278	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019120906
CN W734	43281	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019120909
CN W734	43284	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019120912
CN W734	43287	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019120915
CN W733	43288	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019120916
CN W734	43290	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019120918
CN W734	43293	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019120921
CN W732	43296	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2019120924
CN W734	43425	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121509
CN W734	43428	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121512
CN W734	43431	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121515
CN W733	43432	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019121516
CN W734	43434	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121518
CN W732	43440	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2019121524
CN W734	43449	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121609
CN W734	43452	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121612
CN W734	43455	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121615
CN W733	43456	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019121616
CN W734	43458	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019121618
CN W732	43464	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2019121624
CN W734	43818	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019123118
CN W734	43821	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019123121
CN W734	43824	AVER: 3-hr avg, < 3 hours of data, calms policy used.	2019123124
CN W733	43824	AVER: 8-hr avg, < 6 hours of data, calms policy used.	2019123124
CN W732	43824	AVER: 24-hr avg, < 18 hours of data, calms policy used.	2019123124

Results Summary

C:\Lakes\AERMOD View\MOD-26-00009\MOD-26-00009.isc

Concentration - Source Group: ALL									
Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
1-HR	1ST	124.22477	ug/m^3	651852.00	4027438.00	65.39	0.00	65.39	1/19/2015, 6
3-HR	1ST	93.84481	ug/m^3	651855.74	4027427.85	65.05	0.00	65.05	12/16/2019, 3
8-HR	1ST	64.24652	ug/m^3	651855.74	4027427.85	65.05	0.00	65.05	12/24/2018, 8
24-HR	1ST	33.19624	ug/m^3	651838.66	4027411.62	65.09	0.00	65.09	1/23/2019, 24
ANNUAL		4.24200	ug/m^3	651838.66	4027411.62	65.09	0.00	65.09	

Attachment 2:

Copy of the Prioritization Calculator for the RBI Futera XLF MB2500 Natural Gas Boiler

PRIOR

Name **Prioritization Calculator**

Applicability	Use to provide a Prioritization score based on the emission potency method. Entries required in yellow areas, output in gray areas.		
<i>Author or updater</i>	Matthew Cegielski	<i>Last Update</i>	December 1, 2022
<i>Revisions (updated OEHHA health database to 9/25/25 version) by</i>	Armando Jimenez	<i>Revised Date</i>	September 25, 2025
Facility:	Kendall Jackson Wine Estates, LTD dba Jackson Family Wines		
ID#:			
Project #:	MOD-26-00009		
Unit and Process#	Natural gas heater - 2.5 MMBtu/hr (nearest receptor - 555 meters)		

Use the substance dropdown list in the CAS# Finder to locate CAS# of substances.	
Substance	CAS# Finder
Acetaldehyde	75070

Operating Hours hr/yr	8,760.00
Receptor Proximity and Proximity Factors	
	Cancer Chronic Acute
	Score Score Score Max Score
0< R<100 1.000	8.09E-02 4.67E-03 6.26E-03 8.09E-02
100≤R<250 0.250	2.02E-02 1.17E-03 1.57E-03 2.02E-02
250≤R<500 0.040	3.24E-03 1.87E-04 2.50E-04 3.24E-03
500≤R<1000 0.011	8.90E-04 5.14E-05 6.89E-05 8.90E-04
1000≤R<1500 0.003	2.43E-04 1.40E-05 1.88E-05 2.43E-04
1500≤R<2000 0.002	1.62E-04 9.35E-06 1.25E-05 1.62E-04
2000<R 0.001	8.09E-05 4.67E-06 6.26E-06 8.09E-05

Receptor proximity is in meters. Prioritization scores are calculated by multiplying the total scores summed below by the proximity factors. Record the Max score for your receptor distance. If the substance list for the unit is longer than the number of rows here or if there are multiple processes use additional worksheets and sum the totals of the Max Scores.

Natural gas heater - 2.5 MMBtu/hr (nearest receptor - 555 meters)

Enter the unit's CAS# of the substances emitted and their amounts. Prioritization score for each substance generated below. Totals on last row.

Substance	CAS#	MW Correction	Annual Emissions (lbs/yr)	Maximum Hourly (lbs/hr)	Corrected Annual Emissions (lbs/yr)	Corrected Maximum Hourly (lbs/hr)	Average Hourly (lbs/hr)	Cancer	Chronic	Acute
Acetaldehyde	75070	1.0000	9.23E-02	1.05E-05	9.23E-02	1.05E-05	1.05E-05	1.92E-03	1.13E-05	3.36E-05
Acrolein	107028	1.0000	5.80E-02	6.62E-06	5.80E-02	6.62E-06	6.62E-06	0.00E+00	2.84E-03	3.97E-03
Benzene	71432	1.0000	1.72E-01	1.96E-05	1.72E-01	1.96E-05	1.96E-05	3.84E-02	9.80E-04	1.09E-03
Ethyl benzene	100414	1.0000	2.04E-01	2.33E-05	2.04E-01	2.33E-05	2.33E-05	3.93E-03	1.75E-06	0.00E+00
Formaldehyde	50000	1.0000	3.65E-01	4.17E-05	3.65E-01	4.17E-05	4.17E-05	1.69E-02	6.94E-04	1.14E-03
Hexane	110543	1.0000	1.35E-01	1.54E-05	1.35E-01	1.54E-05	1.54E-05	0.00E+00	3.31E-07	0.00E+00
Naphthalene	91203	1.0000	6.44E-03	7.35E-07	6.44E-03	7.35E-07	7.35E-07	1.69E-03	1.23E-05	0.00E+00
PAHs, total, w/o individ. components reported [Treated as B(a)P for HRA]	1151	1.0000	2.15E-03	2.45E-07	2.15E-03	2.45E-07	2.45E-07	1.82E-02	0.00E+00	0.00E+00
Propylene	115071	1.0000	1.57E+01	1.79E-03	1.57E+01	1.79E-03	1.79E-03	0.00E+00	8.96E-05	0.00E+00
Toluene	108883	1.0000	7.86E-01	8.97E-05	7.86E-01	8.97E-05	8.97E-05	0.00E+00	3.20E-05	2.69E-05
Xylenes (mixed)	1330207	1.0000	5.84E-01	6.67E-05	5.84E-01	6.67E-05	6.67E-05	0.00E+00	1.43E-05	4.55E-06
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Totals								8.09E-02	4.67E-03	6.26E-03

Toxic Air Contaminant (TAC) emissions from the RBI Futera XLF MB2500 natural gas boiler with a rating of 2.5 MMBtu/hr. Emission factors from SJVAPCD AB2588 "Hot Spots" Air Toxics Profiles for natural gas external combustion < 10MMBtu/hr, Toxic Profile #3 (1/6/2023).