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Unrealistic Rule

This rule is essentially putting the cart before the horse. Currently burner technology does not exist that will allow existing or future boilers to run at the 3% O₂ and meet the SCAQMD NO_x requirements for boilers of this size.

Parker Boiler is one of the leaders in Low NO_x burner technology for atmospheric boilers. The lowest of NO_x levels in atmospheric boilers are attained by reduced flame temperature of the Low NO_x burner, and this typically requires higher oxygen levels to do this. 3% O₂ at ultra Low NO_x is simply unattainable.

Mike Alzona
Parker Boiler Co

Prior to my 24 years spent at Parker Boiler, I was a mechanical engineer that spent several years with Maxon (Burner) Corporation doing sales and engineering.