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Low NOx cannot be at 3% O2

Dear Madam/ Sir,

For years I have been working in burner development, trying to lower the NOx while keeping the CO under control as well. As you know, the solution to pollution is not dilution, so running leaner was not the answer. However, running boilers at 3%, it is very hard to get single digit NOx. Not even the biggest boiler or burner manufacturer is stating that they have a technology that can do that. In my previous lab I've had unstable flames that could achieve very low NOx around 5% O2, but these burners were not safe to operate. Therefore I would like to ask you to reconsider the NOx rules for boilers over 5,000,000 BTU/h. 5 ppm is reasonable, but not at 3% O2.