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NOx CORRECTED TO 3% O2 for Boilers Over 5mil input

I am the President of San Jose Boiler Works Inc. a company that has been in business over 100 years now in San Jose, CA., I wanted to let you know that when running boilers at 3%, it is basically impossible to get single digit NOx. Not even the biggest boiler or the biggest burner manufacturer is stating that they have a technology that can do that. Therefore I would like to ask you to reconsider the NOx rules for boilers over 5,000,000 BTU/h. 5 ppm NOx CORRECTED TO 3% O2 is reasonable, but not running 5 ppm NOx AT 3% O2. More importantly I am VERY concerned with the safety aspect of this as well. When you run a burner at its Minimum O2 Level, that means that there is no room for error. In other words if a technician were to turn a boiler at 3%, O2 and then leave the boiler room and close all the doors and potentially a rollup door. The room will become oxygen deficient because we always like to have a small amount of excess air as a safety cushion. However, if the room does go oxygen deficient, the burner will then produce carbon monoxide at levels above 5000 ppm very easily and quickly, there is nothing to stop the burner firing as the flame detection system will see flame and stay on. I have proven and tested this in various Boiler rooms. Can I believe the reason that some boiler rooms will become oxygen deficient is because the combustion air openings in many Boiler rooms are undersized and or dirty from lint reducing the amount of free that can enter the roof for combustion and ventilation. At that point, the burner will be fuel rich and not have enough air to run properly or safely. I would strongly urge for liability reasons alone to look at this situation very closely.