

DOCKETED

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Comment Received From: Mauro Donate
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3% O2 on 5 MMBTUH Boilers

To the California Energy Commission Rule Makers,

My name is Mauro Donate, and I am the owner of MDH Burner and Boiler Co. in South Gate, CA. For over 30 years, our company has tuned thousands of combustion systems.

I am writing to express a significant concern regarding the current rule that requires boilers (5.0 MMBTUH or larger) to operate at 3% O2 while also meeting a 5 ppm NOx level. In our extensive experience, this requirement is simply unattainable for any boiler burner of any size.

Attempting to run a burner at 3% O2 creates significant burner instability problems and can lead to very high CO emissions. These are serious safety concerns for boiler operators and technicians.

From our observations, a target of 9% O2 and 7 ppm NOx is achievable with certain burner systems. However, we also know that many boiler manufacturers' designs are not compatible with these ultra-low NOx burners. You can see that these numbers are far from the current rule requiring 3% O2 and 5 ppm NOx.

We strongly urge you to reconsider this rule from both a logical standpoint and with the safety of boiler operators and technicians in mind.

Thank you for your time and consideration.

Sincerely,
Mauro Donate
Owner, MDH Burner and Boiler Co.