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Working at a burner manufacturer that has worldwide sales, I wanted to let you know that when running boilers at 3%, it is impossible to get single digit NO_x. Not even the biggest boiler or the biggest burner manufacturer stating that they have a technology that can do that. Therefore, I would like to ask you to reconsider the NO_x rules for boilers over 5,000,000 BTU/h. 5 ppmv NO_x CORRECTED TO 3% O₂ is reasonable, but not running 5 ppmv NO_x AT 3% O₂. Flame temperatures must be reduced to achieve lower NO_x, this is accomplished by introducing more mass flow to take some of the heat from combustion utilizing excess O₂, steam, flue gas recirculation, staged combustion and other mechanics. The correction to 3% O₂ (dry) normalizes this calculation for all parties and allows comparison of all technologies to represent common NO_x values.