

COMPACT, HIGHLY EFFICIENT, QUICK STARTING  
STEAM GENERATOR SYSTEMS



March 8th, 2024

Subject: SCAQMD Rule 1146.2 potential rule change

Attention: Michael Krause -Assistant DEO, 909-396-2706, Emily Yen – Assistant Air Quality Specialist, 909-396-3206, Heather Farr – Planning & Rules Mgr., 909-396-3672

To whom this may concern:

Clayton Industries opposes the proposed rule change which in effect would require all small steam boilers to be electric only. Opposition is based on the following:

**It would present an economic hardship to our customers:**

a) These customers have already paid a premium for SCAQMD pre-certified equipment.

b) Infrastructure does not exist to bring newly required electrical power into most facilities effected. Targeted small commercial boilers typically used by small businesses/manufacturers that would now be forced to make very expensive upgrades that may not even be possible in some cases due to permitting/zoning, economic requirements. (example: 49 BHP boiler, even if they had three phase/ high voltage power available, would need 600 amps to run at 460volts. The amperage would be even higher if they used lower voltage or single- phase power!)

c) Cost of running an electrical boiler is substantially more expensive than running on gas due to high cost of electricity.

d) Increased dependence on a less reliable power source will make it more difficult to run a business. Without electrical power, the boiler and work/services will be off- line.

**It will further perpetuate California's hostile business environment to the detriment of Californians:**

a) Many small manufacturers and services (dry cleaners for example) may be forced to relocate or go out of business.

b) This will discourage many new companies from manufacturing/processing or providing services in California.

c) With less good paying jobs, the middle class will continue to be pushed out of California.

d) The above means less tax revenue that adds to California's financial problems.

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It is not practical at this time:

- a) Aside from the electrical current capacity limitation of local users, the power grid throughout California is already having trouble keeping up with current statewide electrical requirements, evidenced by rolling blackouts and the high cost of electricity.
- b) even the push for electric car mandates has had to deal with the realities of the current electric grid.
- c) The latest low NOx gas fired burners provide extremely low levels of air pollution.
- d) Majority of air pollution caused by vehicle emissions.
- e) The impact to small businesses would be too large in relation to the actual impact to the overall air pollution problem.

Recommendation:

Rather than go to the extreme of all electric boilers, reduce the NOx limit from 20ppm to 15ppm, CO under 50ppm, and requirement for full premix burners.

We hope that the SCAQMD will re-consider this radical change.

Sincerely,

*Brian T. Dominici*

**CLAYTON INDUSTRIES**

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