



**FURNACE DYNAMICS, INC.**

261 Euclid Ave.  
Long Beach, CA 90803  
562-433-3025

April 8, 2020

Mr. Michael Morris  
Rules and Planning Manager  
South Coast Air Quality Management District  
91865 Copley Drive  
Diamond Bar, CA 91685

RE. Source Test Information Request

Dear Mike,

Pursuant to the matrix that was presented at the March 26, Rule 1147.2 Working Group Meeting we are requesting additional information relating to the presented source test results for <30 ppm NOx. As I indicated in my letter to James McCreary (included) there are numerous factors in evaluating source test results. Unfortunately, there were a significant number of data points that were not included in the handout. These are important to understand what was tested and under what conditions. Only then can a clearer picture emerge as to the efficacy of the results.

I have provided an Excel spreadsheet that contains three different tabs *Handout <30 ppm, ST >30 ppm and Non ST Furnaces*. At the bottom of each spreadsheet is a description of the requested information. All the requested information is contained in the District's source test results for each device. There is a shaded area at the bottom of each spreadsheet that provides an example of the requested information.

**Handout <30 ppm:** The first spreadsheet is laid out in the same order as the handout. It includes the type of equipment, BTU input, Permit Limit and ST Results. There are many other categories of items requested that are available on the source test results. This additional information provides a clearer picture of how the tests were conducted and the relevancy of the results.

**ST >30 ppm:** This spreadsheet is provided to evaluate the equipment in the Districts database for those devices that have been source tested but at a higher than 30 ppm result. Since 1147.2 rule intension is to require retrofitting of burners to a lower emission value, it is equally important to evaluate the over 30 ppm source tested furnaces. In acquiring this information an understanding of the challenges that are in front of industry. This will also assist in knowing if there are burners available that can satisfy the proposed ppm limit. Feel free to add lines to accommodate the additional furnace information.

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**Non ST Furnaces:** There are many furnaces that have never been source tested under the RECLAIM Program. These may have not been tested or retrofitted due to the purchase of RTCs or some other factors. This group may have some additional challenges due to furnace configuration.

For us to have a complete picture of the task ahead, significantly more information is necessary. It is equally important to understand the total picture including the availability of combustion equipment, issues of implementation that include control systems, piping requirements, refractory modifications to accommodate the new burners.

We appreciate your assistance in supplying this very important information. Should you have questions or comments, please feel free to call any time.

Sincerely,

Anthony W. Endres  
President

Enc.

cc. Susan Nakamura  
Uyen Uyen Vo  
James McCreary