



May 31, 2023

Mr. Sarady Ka  
Program Manager  
South Coast Air Quality Management District (SCAQMD)  
21865 Copley Drive  
Diamond Bar, CA 91765

**Subject: Comments on SCAQMD Proposed Amended Rule (PAR) 1153.1**

Dear Mr. Ka:

On behalf of United States Bakery Company (USB), I would like to share our concerns regarding the proposed amendment to South Coast Air Quality Management District (SCAQMD) Rule 1153.1: Emissions of Oxides of Nitrogen (NOx) from Commercial Food Ovens.

USB has operated a bakery in Southern California since 2017, providing livable wages, with secure jobs, and baked goods to the community, in the Southern California LA area. Since the inception of the bakery, we have added a donut line that was fully vetted for air quality standards. We have been complying with the 2014 requirements.

SCAQMD Rule 1153.1 was initially adopted on September 4, 2014. Food ovens were previously required to comply with the emission limit requirements of Rule 1147 (adopted in 2011). Rule 1147 established standard emission limits for all miscellaneous combustion equipment outside of boilers, engines, and turbines. However, the NOx limits for food ovens under Rule 1147 were not feasible for food ovens, so the SCAQMD adopted Rule 1153.1 to allow in-use ovens to meet emission limits of 40 parts per million (ppm) NOx corrected to 3% oxygen (O2) for food ovens operating 500°F or less and 60 ppm NOx at 3% O2 for food ovens operating over 500°F.

Our concerns are:

1. Current viable options for replacement and testing have not been available to meet the proposed rule 1153.1, nor has this been vetted to show consistent quality in products served in the community.
2. The ability to continue to provide baked goods and jobs for the community at this location in the event of removing and adding a new oven. This location has 1 oven and would require a significant amount of time to remove and replace, causing employee hardships.

If you have any questions or concerns, please contact me at (503) 232-2191 x 4232.

Thank you for your consideration,

Mark Park  
Corporate Compliance Manager  
United States Bakery