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March 04, 2024

SCAQMD  
21865 E. Copley Drive  
Diamond Bar, CA 91765

ATTN: Heather Farr  
Planning and Rules Manager

Re: SCAQMD Rule 1146.2 Proposed Amendments

Thank you for the opportunity to provide comments relating to the proposed amendments to SCAQMD Rule 1146.2 (Emissions of Oxides of Nitrogen From Large Water Heaters and Small Boilers and Process Heaters). Boeing requests that the following changes be incorporated into the proposed amendments to the rule:

- Proposed Amended Rule 1146.2 (Table 2) assigns a life expectancy (unit age) of 15 Years for Type 1 units and 25 years for Type 2 units. The Boeing Company (Boeing) typically sees longer life expectancy for these types of units due to the maintenance programs employed by the company. Even the draft staff reports states that 25 years is used for Type 1 and Type 2 boilers (Page 2-15) with respect to the cost-effectiveness analyses. Boeing requests that the unit age for Type 1 boilers be increased to 25 years and Type 2 boilers increased to 30 years.
- PAR 1146.2 (d)(9) provides that Type 1 and Type 2 units that do not meet specified NOx limits must be removed from service within one year after rule adoption. Boeing anticipates having to replace a number of units currently in the RECLAIM program and the specified time frame is insufficient to allow replacement. Boeing has replaced several of these units over the past few years. The projects typically takes anywhere from 12-18 months for planning, permitting and installation, assuming there are no issues with delivery of equipment. In addition, this relatively short time frame does not allow adequate time to perform the necessary engineering evaluations to determine if a switch to heat pumps might be a suitable approach. Boeing requests that the compliance dates contained in Table 3 for existing equipment be utilized for these units.
- PAR 1146.2 (g)(1) requires that copies of source tests be retained onsite. These reports are usually maintained at a central office and Boeing requests that the language in recently adopted SCAQMD Rule 1147 (h)(8) be utilized in lieu of the proposed language.
- PAR 1146.2 (h)(3) specifies that the owner/operator maintain documentation identifying the rated Heat input capacity of the unit. The manufacturer's label on the unit specifying the required information should be sufficient to meet this requirement.
- PAR 1146.2 (i)(1) specifies requirements for obtaining relief with respect to the lack of power availability at a facility. Utility upgrades, especially for larger facilities, may be a multi-year project. Is the intent that a company will have to request a new extension every year from SCAQMD until the facility has completed the work, since the company will have spelled out the

specific requirements in (i)(1)(D)? With respect to (i)(1)(C), notification period should be changed to 72 hours to allow adequate time for internal review, especially if completion occurs over weekends or holidays. Boeing also seeks clarification on what information is required under (i)(1)(D)(i)(E). Companies are dependent upon the utility to provide the necessary infrastructure upgrades and the associated time table for when the upgrades will be completed. Boeing is unsure what information SCAQMD is requesting in this section that demonstrate delays are beyond the control of the owner/operator.

Boeing looks forward to continuing to work with District staff in the development of the proposed amendments to SCAQMD Rule 1146.2. Note that we are continuing to assemble cost and emission information for the Boeing facilities and are working to providing the additional information this week. If you should have any questions or require additional information, please do not hesitate to contact me.

A handwritten signature in black ink, appearing to read 'William Pearce', with a long horizontal line extending to the right.

William Pearce  
Senior Environmental Engineer  
Environmental Services  
Environment, Health & Safety