

COMPARATIVE ANALYSIS

**PROPOSED AMENDED RULE 69.2.1 –
SMALL BOILERS, PROCESS HEATERS, STEAM GENERATORS,
AND LARGE WATER HEATERS**

Statutory Requirements

Prior to adopting, amending, or repealing a rule or regulation, California Health and Safety Code Section 40727 requires findings of necessity, authority, clarity, consistency, non-duplication, and reference. As part of the consistency finding to ensure proposed rule requirements do not conflict with or contradict other District or federal regulations, Health and Safety Code Section 40727.2(a) requires the District to perform a written analysis identifying and comparing the air pollution control standards and other provisions of proposed amended Rule 69.2.1 with existing or proposed District rules and guidelines and existing federal rules, requirements, and guidelines applying to the same source category.

Comparison with existing District rules and regulations

There are no prohibitory District rules that apply to combustion units of this size. In addition, such units fired on natural gas are not subject to the District Permit to Operate requirements pursuant to Rule 11 (Exemption from Rule 10 Permit Requirements) and consequently are not subject to the New Source Review (NSR) rules.

Combustion units operating on liquid fuel with heat input rating from 1 million British thermal units (Btu) per hour to 2 million Btu per hour would require a District Permit to Operate and comply with the NSR requirements. However, based on the emission limits of proposed amended Rule 69.2.1 and a worst case scenario of continuous 24-hour daily operation, the potential to emit for a 2 million Btu per hour unit would be significantly less than the 10 pounds per day NSR applicability threshold for Best Available Control Technology (BACT).

Comparison with federal NSPS Subpart Dc

New Source Performance Standards (NSPS) Subpart Dc – Small Industrial-Commercial-Institutional Steam Generating Units is applicable to units with a heat input rating of 10 million Btu per hour or more. Thus, NSPS Subpart Dc does not apply to combustion equipment with a heat input rating from 75,000 Btu per hour to 2 million Btu per hour that are subject to proposed amended Rule 69.2.1.

Conclusion

There are no conflicts or contradictions between proposed amended Rule 69.2.1 and BACT requirements. In addition, there are no applicable federal regulations for combustion equipment subject to proposed amended Rule 69.2.1.