

From: [Bijit Kundu](#)
To: [Hunt, Marshall](#); [Willmore, Lovell \(LWillmore@semprautilities.com\)](#)
Cc: [Elliott, Ed](#); "[SKristjansson@semprautilities.com](#)" ([SKristjansson@semprautilities.com](#)); [Bryan Boyce](#); [David Jagger](#)
Subject: FW: NOx limits SCAQMD
Date: Monday, May 11, 2015 12:09:39 PM

Marshall/Lovell,

David looked into this issue during the CWF rule. See below some of his findings.

-Bijit

Bijit Kundu | (510) 482-4420 x261

From: David Jagger
Sent: Monday, May 11, 2015 12:06 PM
To: Bijit Kundu
Subject: RE: NOx limits SCAQMD

I did look into this briefly and my understanding is the concern is about the potential South Coast Air Quality Management District (SCAQMD) rule 1111.1.

This rule is based on the 2009 rule 1111 which reduced allowable NOx from 40 ng/J to 14 ng/J for furnaces with heat inputs between 50,000 and 175,000 Btu/hr. The CWF DOE rulemaking only affects commercial furnaces that have a heat input greater than 225,000 Btu/hr. So rule 1111 didn't apply to this range of furnaces.

The plan behind rule 1111.1 is to expand these NOx reductions to commercial sized furnaces. Unfortunately I haven't been able to find any specific information regarding the details of rule 1111.1 (new estimated proposal date, implementation date, furnace input size, exemptions) but it would be safe to assume that if the rule goes forward that it would include the input ranges of the DOE rulemaking furnaces.

I did a quick search over the meeting agendas for the SCAQMD and I didn't see rule 1111.1 mentioned anywhere so It doesn't seem like there has been any publically available update on the status/progress of this rule.

David

From: Bijit Kundu
Sent: Monday, May 11, 2015 8:31 AM
To: David Jagger
Subject: FW: NOx limits SCAQMD

Is this this NOx issue you looked at for CWF? Do we have any resources/background to send to Lovell?

Bijit Kundu | (510) 482-4420 x261

-----Original Message-----

From: Willmore, Lovell [<mailto:LWillmore@semprautilities.com>]

Sent: Monday, May 11, 2015 8:12 AM

To: MBH9@pge.com

Cc: Ed Elliott; Bijit Kundu; Bryan Boyce; Kristjansson, Sue

Subject: RE: NOx limits SCAQMD

No, this is the first I've heard of this. Do you have some info you could send me and what are your thoughts?

Lovell B. Willmore
Southern California Gas Company
Market Advisor
Codes and Standards
213-244-2524 Office
949-923-7870 Cell
ML GT19A6

-----Original Message-----

From: Hunt, Marshall [<mailto:MBH9@pge.com>]

Sent: Monday, May 11, 2015 5:56 AM

To: Willmore, Lovell

Cc: Elliott, Ed; Bijit Kundu; Bryan Boyce (ES); Kristjansson, Sue

Subject: NOx limits SCAQMD

Lovell

AHRI is concerned about the reduction of allowable NOx being cut from 40 to 14. Is SCG covering this issue?

Sent from my iPhone

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