

**SAN DIEGO COUNTY  
AIR POLLUTION CONTROL DISTRICT**

**DRAFT PROPOSED AMENDMENTS TO  
RULE 69.2.2 – MEDIUM BOILERS, PROCESS HEATERS,  
AND STEAM GENERATORS**

**WORKSHOP REPORT**

The San Diego County Air Pollution Control District (District) held a public workshop on July 21, 2021, to discuss and receive input on the draft proposed amendments to Rule 69.2.2 – Medium Boilers, Process Heaters, and Steam Generators. A meeting notice was mailed to each permit holder and chamber of commerce in the region, as well as the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB). Additionally, a meeting notice was posted on the District’s website and distributed to interested parties, including through the District’s electronic mail service.

The workshop was attended by 10 people. A summary of the comments and District responses are provided below:

**1. WORKSHOP COMMENT**

The equipment certification requirement in Section (f) Manufacturer Requirements should be revised to include District certification of new units by proxy using other California air districts’ certifications, such as Ventura County Air Pollution Control District (VCAPCD) Rule 74.15.1 (Boilers, Steam Generators, and Process Heaters), which requires that each device shall be certified by the South Coast Air Quality Management District (SCAQMD) in accordance with the requirements of SCAQMD Rule 1146.2 (Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters).

**DISTRICT RESPONSE**

VCAPCD Rule 74.15.1 requires that any new or replacement unit with a heat input rating from 1 to 2 million Btu per hour be certified in accordance with the requirements of SCAQMD Rule 1146.2. Units in that size range are not subject to Rule 69.2.2 because the rule only applies to units rated between 2 and 5 million Btu per hour. In comparison, SCAQMD Rule 1146.2 applies to units rated 75,000 to 2 million Btu per hour. Therefore, including a reference in Rule 69.2.2 to certify per SCAQMD Rule 1146.2 requirements would not be appropriate because the two rules apply to different size ranges of equipment.

The District is aware of only one other California air district that currently requires certification for equipment rated between 2 and 5 million Btu per hour: the Bay Area Air Quality Management District (BAAQMD) Regulation 9, Rule 7 (Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional and Commercial Boilers, Steam Generators and Process Heaters). Accordingly, existing Rule 69.2.2 requires that units to be certified by the District shall be emissions source tested using San Diego Test Method 100 (Test Procedures for the Determination

of Nitrogen Oxides, Carbon Monoxide, and Diluent Gases by Continuous Emission Monitoring, May 1995), or using BAAQMD test methods as specified in Subsections (i)(1)(i) and (ii), respectively.

**2. CARB COMMENT**

CARB has no official comments at this time.

**3. EPA COMMENT**

Section (a) Applicability should be revised to separate the section into Subsections (a)(1) and (2) in order to better clarify that the rule applies to manufacturers and distributors, and to installers or operators.

**DISTRICT RESPONSE**

The District agrees. Section (a) Applicability has been revised as suggested.

**4. EPA COMMENT**

Subsection (b)(3) should be revised to "...shall not apply to any *new* unit *intended to be* used in conjunction with any equipment..." in order to clarify that the exemption is provided for new units that have not yet been installed and operated.

**DISTRICT RESPONSE**

The District agrees. Subsection (b)(3) has been revised as suggested.

**5. EPA COMMENT**

Subsection (b)(3) exempts a unit from certification requirements if used in conjunction with "any equipment...subject to permit requirements of Rule 10 – Permits Required." Under what circumstances will this exemption be used?

**DISTRICT RESPONSE**

Subsection (b)(3) provides a limited exemption only from the certification requirement for any new unit that is intended to be used in conjunction with any equipment, product line, system, process line or process that is subject to permit requirements. There may be a rare circumstance in which a new unit that has not been certified by the manufacturer to meet the emissions standards is needed to support a process or operation that requires a Permit to Operate. In this case, an owner

or operator of a new non-certified unit is required to apply for a Permit to Operate because the unit is not eligible to apply for a Certificate of Registration. During the permit application process, the District will review and verify compliance of the new unit with the emissions standards of the rule.

**6. EPA COMMENT**

Do the requirements in Section (e) Monitoring Requirements apply to dual-fueled units?

**DISTRICT RESPONSE**

Yes, the requirements in Section (e) apply to dual-fueled units only, which are capable of operating on both gaseous and liquid fuel.

**7. EPA COMMENT**

In the event that a new unit that has not yet been certified is installed and subsequently fails the source testing pursuant to Subsection (f)(1)(iii)(A), what enforcement actions will the District take to ensure that the responsible party of the unit complies with the rule requirements?

**DISTRICT RESPONSE**

A boiler Certificate of Registration will include a condition specifying that new units shall be operated in accordance with the requirements of Section (f) Manufacturer Requirements. Section (f) Manufacturer Requirements requires a manufacturer to certify each new unit model either: a) at least 30 days prior to offering the unit for sale in San Diego County, or b) no more than 30 days after performing the initial source test of an installed new unit. The initial source test shall be conducted within 30 days of installing the new unit.

In the event the initial source test fails to demonstrate compliance, manufacturers will have 30 days from the date of unit installation to take corrective measures and conduct a subsequent source test. District enforcement action will be taken if subsequent tests fail to demonstrate compliance of the unit with the emissions standards of the rule within 30 days of unit installation. In addition, operation of a unit that has not been certified by the District within 30 days of the initial source test will also result in District enforcement action.

**8. EPA COMMENT**

Subsection (i)(1)(ii) should reference the date of EPA approval as July 6, 1982, instead of January 1982.

**DISTRICT RESPONSE**

The District agrees. Proposed Subsection (i)(1)(ii) has been revised as suggested.

**9. EPA COMMENT**

Subsection (i)(2) specifies ASTM Test Method D-6522-20 (Standard Test Method for Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Concentrations in Emissions from Natural Gas-Fired Reciprocating Engines, Combustion Turbines, Boilers, and Process Heaters Using Portable Analyzers). This version of the test method has not been approved by the EPA. Version D-6522-11, which is specified in existing Rule 69.2.2, was approved by the EPA on December 1, 2011.

ASTM Test Method D-6522-11 is used to determine compliance with the rule's emissions limits, and continued compliance via subsequent annual tuning. Enforcement of the rule provisions in Section (d) Standards, Section (f) Manufacturer Requirements, and Section (h) Record Keeping Requirements relies on the version of the test method approved by the EPA. Test methods that are not EPA approved are not federally enforceable. Therefore, proposed ASTM Test Method D-6522-20 is a rule approvability issue, and version D-6522-11 should be retained.

**DISTRICT RESPONSE**

The District agrees. Proposed ASTM Test Method D-6522-11 has been retained as suggested.

**10. EPA COMMENT**

The District may consider adding in Subsection (i)(2) EPA Conditional Test Method CTM-030 (Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers, October 1997) as an alternative to ASTM Test Method D-6522-11.

In addition, the end of Subsection (i)(2) should be revised to “*or the most current version approved by EPA.*”

**DISTRICT RESPONSE**

The District agrees. Proposed Subsection (i)(2) has been revised to “*or their most current versions approved by EPA.*”

**11. EPA COMMENT**

Rule 69.2.2 does not specify a tuning procedure for liquid fuel-fired units. The rule applies to gaseous and liquid fuel-fired units, but ASTM Test Method D-6522-11 (Standard Test Method for Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Concentrations in Emissions from Natural Gas-Fired Reciprocating Engines, Combustion Turbines, Boilers, and Process Heaters Using Portable Analyzers) is specific to the tuning of natural gas-fired units only. This is an approvability issue, and therefore the District should include an EPA approved tuning method for liquid fuel-fired units.

**DISTRICT RESPONSE**

The District agrees. Proposed Subsection (i)(3) has been added to include a reference to the BAAQMD Manual of Procedures, Volume 1, Chapter 5 (Boiler, Steam Generator and Process Heater Tuning Procedure, August 6, 2001), to specify a tuning procedure for liquid fuel-fired units.

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