



Mr. Dennis Roberts
San Joaquin Valley Unified Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, CA 93726

February 23, 2010

Dear Mr. Roberts:

On behalf of Nationwide Boiler Inc., I am submitting the following comments for your review in regards to San Joaquin Valley Air Pollution Control District's Draft Staff Report entitled, *Climate Change Action Plan: Addressing GHG under CEQA*. The comments below are specifically in response to Section 5.3, Best Performance Standards for Stationary Source Projects (Industrial and Agricultural).

Comment #1: In response to Option #1 Fossil Fuel-fired Boilers, Steam Generators and Process Heaters with Firing Capacity > 5 MMBtu/hr.

95% is maximum efficiency obtainable only with a fully condensing boiler. More reasonable efficiency would be 90% minimum which if you had 100% cold water make-up this is attainable. For 95% efficiency, you need an outside almost unlimited cold water source and heat sink to obtain, which in most facilities is not possible, practical, or feasible. Many industrial facilities do not have a need for low grade hot water so this option is not feasible for many facilities.

Comment #2: In Response to Option #2 Fossil Fuel-fired Boilers, Steam Generators and Process Heaters with Firing Capacity > 5 MMBtu/hr.

These parameters are good and already proven and in use on many watertube and larger firetube (>20mmbtu) steam boilers, however SCR catalyst will have temperature performance issues on smaller firetube hot water and low pressure steam heating type boilers (generally in the 5-20mmbtu range) that operate <300F stack temperatures. Most high pressure steam boilers will operate >300F stack temperature and thus are suitable for SCR application.

I urge you to review the practicality and feasibility of the proposed options as they apply specifically to users within your district. I would also suggest an in depth analysis of the economic and operational costs involved with each option, including a detailed payback period analysis.

Please feel free to contact my office if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "L. K. Day", is written over the signature line.

Larry Day
Executive Vice President
Nationwide Boiler Inc.
510-490-7100 / lday@nationwideboiler.com