



Ryan Bares <rbares@utah.gov>

New Rules R307-315 and R307-316

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I would like to express my concerns for these new proposed rules for less than 9 ppm NOx.

The problems that I see are as follows:

1. The BTU content of the supplied natural gas is not consistent, thereby creating a, at best, very difficult burner startup and balance situation.
2. Elevation O2 concentration and with varying barometric pressure. At elevation, it is lower, thereby creating the need to force more volume of air into the combustion chamber of the burner.

There is a possibility that the startup will fail, on flame failure, as a result of the velocity of air going across the ignitor and burner.

3. Overall costs to the owner and customers / consumers will be increased, the ROI is questionable. The power burner itself is approximately double the costs.
4. I would recommend an amendment to 20ppm NOx, as this is sustainable and measurable.

Please call with any questions or concerns.

Best Regards,

Conrad N. Campos

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