

MEMORANDUM

TO: Community Advisory Council Members

FROM: Rebecca Armstrong

DATE: July 26, 2011

SUBJECT: Proposed Amended Rule 352, Natural Gas-Fired Fan-Type Central Furnaces and Residential Water Heaters

Enclosed please find proposed amended Rules 352, *Natural Gas-Fired Fan-Type Central Furnaces and Residential Water Heaters* for your review.

Rule 352 regulates oxides of nitrogen (NO_x) emission from natural gas-fired central furnaces and residential water heaters with a heat input rating less than 75,000 British thermal units (Btu) per hour. Rule 352 is a point-of-sale rule.

The 2010 APCD Clean Air Plan (CAP) includes a commitment for the APCD to adopt a control measure for gas-fired small water heaters subject to Rule 352 by reducing the current NO_x limit of 55 parts per million (ppm) to 15 ppm. Proposed amended Rule 352 fulfills this commitment. The NO_x emission limits for natural gas-fired fan-type central furnaces subject to Rule 352 will remain at 55 ppm.

The proposed emission limit revision for small water heaters is consistent with the limits already adopted by the South Coast Air Quality Management District, the Ventura County APCD and the San Joaquin Valley APCD. Manufacturers have made water heaters which comply with the 15 ppm limit for almost four years. This rule revision also adds a sell-through provision that enables distributors to sell existing water heaters that do not meet the 15 ppm limit until July 1, 2012.

There are no water heater manufacturers in Santa Barbara County. Since the proposed limits are being met in other surrounding air districts, sources will be able to purchase compliant units from vendors. The APCD does not expect there will be a direct effect on the sources of Santa Barbara County due to this revision to Rule 352.

For more information regarding this rule revision please see the APCD website (www.sbapcd.org).

We are requesting the CAC to recommend that the Board adopt this rule amendment. We anticipate bringing this proposed amended rule to the Board at their October 2011 hearing.