

APPENDIX A

**Summary of Significant Comments and Responses
For Revised Proposed Amendments to Rule 4905**

December 23, 2014

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

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**SUMMARY OF SIGNIFICANT COMMENTS
FOR PROPOSED AMENDMENTS TO RULE 4905 (NATURAL GAS-FIRED, FAN-
TYPE RESIDENTIAL CENTRAL FURNACES)
PROPOSED RULE PACKAGE – December 18, 2014**

The rule package for proposed amendments to Rule 4905 (Natural Gas-Fired, Fan-Type Residential Central Furnaces) was heard before the District's Governing Board at a public hearing on December 18, 2014. The following is a summary of comments received at the public hearing.

EPA REGION IX COMMENTS:

No verbal comments were received from EPA at the public hearing.

ARB COMMENTS:

No verbal comments were received from ARB at the public hearing.

PUBLIC COMMENTS:

Comments were received from the following:

Southern California Gas Company (SCGC)

- 1. COMMENT:** We appreciate the District's support in obtaining the research and development funding for the technology assessment. We also appreciate the District making proposed Rule 4905 consistent with South Coast Air Quality Management District (SCAQMD) Rule 1111 and we support the proposed rule amendments. (SCGC)

Response: The District recognizes and appreciates efforts on the part of SCGC in developing new technology and participating in the rule amendment process for proposed Rule 4905.

**SUMMARY OF SIGNIFICANT COMMENTS
FOR PROPOSED AMENDMENTS TO RULE 4905 (NATURAL GAS-FIRED, FAN-
TYPE RESIDENTIAL CENTRAL FURNACES)
PROPOSED RULE PACKAGE – November 18, 2014**

The rule package for proposed amendments to Rule 4905 (Natural Gas-Fired, Fan-Type Residential Central Furnaces) was made available for public review and comment by the San Joaquin Valley Unified Air Pollution Control District (District) on November 18, 2014. Summaries of significant comments received during the public comment period are summarized below.

EPA REGION IX COMMENTS:

A comment letter was not received from EPA.

ARB COMMENTS:

A comment letter was not received from ARB.

PUBLIC COMMENTS:

Comments were received from the following:

Air-Conditioning, Heating, & Refrigeration Institute (AHRI)
Goodman Global, Inc. (Goodman)

- 1. COMMENT:** The District should revise Proposed Rule 4905 in one or both of the following ways:
 - Add a mitigation fee option to Proposed Rule 4905.
 - Extend the compliance deadlines in Proposed Rule 4905 by one year to allow additional time for manufacturers to develop compliant units and plan inventory positions. (AHRI, Goodman)

RESPONSE: The compliance deadlines and 300-day sell-through period within Proposed Rule 4905 are consistent with those recently adopted by SCAQMD. It is expected that new units will be available by the proposed compliance deadlines. To satisfy plan commitments and provide for regulatory consistency in California, the District will not extend the proposed amendments an additional year; however, to address the concerns presented, the District will consider adding an emission fee option to Proposed Rule 4905. This additional option will be presented to the Governing Board at the Public Hearing on December 18, 2014. If the Board approves of adding an emission fee option to Rule 4905, the District will return to the Board with updated amendments for consideration in early 2015.

**SUMMARY OF SIGNIFICANT COMMENTS
FOR DRAFT AMENDMENTS TO RULE 4905
(NATURAL GAS-FIRED, FAN TYPE RESIDENTIAL CENTRAL FURNACES)
PUBLIC WORKSHOP – OCTOBER 16, 2014**

The San Joaquin Valley Unified Air Pollution Control District (District) held a public workshop to present, discuss, and hear comments on the draft amendments to Rule 4905 and draft staff report on October 16, 2014. Summaries of significant comments received during the public workshop and the associated two-week commenting period following the workshop are summarized below.

EPA REGION IX COMMENTS:

1. **COMMENT:** Clarify if all units or only reference units from the manufacturer should be tested and certified under Section 6.2.1.

RESPONSE: Clarifying language has been added to section 6.2.1. See the Proposed Rule and Final Draft Staff Report for these changes.

2. **COMMENT:** Correct the typographic error referencing ARB Method 100.1 in section 6.2.2.

RESPONSE: The reference to CARB Method 100.1 in Section 6.2.2 was changed to CARB Method 100, which was approved by EPA June 28, 1997. See the Proposed Rule for this change.

3. **COMMENT:** The District should reduce the sell-through period from the 1 year that is currently proposed to a shorter period. Analogous South Coast Rule 1111 allows for a 300 day sell through period.

RESPONSE: The sell-through period has been amended to be consistent with the sell-through period in South Coast Rule 1111. See the Proposed Rule and Final Draft Staff Report for these changes.

ARB COMMENTS:

The District did not receive a comment letter from ARB.

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PUBLIC COMMENTS:

Comments were received from the following:

Air-Conditioning, Heating, & Refrigeration Institute (AHRI)
Ingersoll Rand (IR)
Southern California Gas Company (SCGC)

4. **COMMENT:** What is the price differential between new units and old units based on? (SCGC)

RESPONSE: The price differential between new units and old units is based on the information used by SCAQMD to set the prices of the emission fee option during the September 5, 2014 amendments to Rule 1111.

5. **COMMENT:** The SCAQMD Rule lists the new lower NO_x emission limit as 14 ng/J, and in the Staff Report for September 5, 2014 amendments, states that this is equivalent to 20 ppmv. The District has a ppmv limit of 19.5. This may cause problems due to regulatory inconsistency between the two air districts. (AHRI, IR, SCGC)

RESPONSE: The NO_x limit has been revised in proposed Rule 4905 to 20 ppmv for simplicity and consistency.

6. **COMMENT:** The District should verify with manufacturers that the labeling requirements added to Draft Rule 4905 are feasible to implement. (SCGC)

RESPONSE: The labeling requirements match those in SCAQMD Rule 1111, which were adopted after extensive meetings with industry representatives and public workshops.

7. **COMMENT:** The District should add a mitigation fee option to proposed Rule 4905 to allow manufacturers that are unable to commercialize new units to still sell non-compliant units in the District. The District should also extend the compliance deadlines beyond those in the SCAQMD to allow additional time for manufacturers to commercialize new units and respond to the increase in production volume. (AHRI, IR)

RESPONSE: As discussed in the Final Draft Staff Report, the compliance deadlines within Proposed Rule 4905 are consistent with the deadlines recently adopted by SCAQMD. Additionally, some manufacturers have indicated that compliant models are currently ready for sale, and the District expects additional

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manufacturers to have compliant units available by the compliance deadlines. Refer to the Final Draft Staff Report for further details.

8. **COMMENT:** The District should address weatherized units as a separate category, with a later compliance deadline than non-weatherized units. (AHRI, IR)

RESPONSE: The District amended the Proposed Rule to implement compliance dates that are consistent with SCAQMD. Manufacturers of weatherized units would have until October 1, 2016, with a sell-through period until July 27, 2017, to comply with the proposed 0.0325 lb/MMBtu NO_x emission limit. See Proposed Rule 4905 and the Final Draft Staff Report for further details.

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