

May 19, 2006

New Hampshire Division of Environmental Services
Air Resources Division
6 hazen Dr
Concord, NH 03302
Mr. Regulator

Dear Mr. Regulator:

Recently we requested from your Department NOx and CO emission regulation information pertaining to natural gas and oil fired boiler systems. I thank you for helping us by providing this information as it will allow us to compare regulations in different parts of the country.

EPA ozone non-attainment designations are having a significant impact both on industry and on regulatory agencies such as yours. Many non-attainment areas are scrambling to determine the best available options to include in their State Implementation Plan. Here is where I think we may be able to help you.

Cleaver-Brooks is the largest producer of hot water and steam boilers in the US. We have spent the past five years developing a state of the art burner and boiler packages that produces less than 9 ppm NOx when firing natural gas and less than 70 ppm NOx when firing distillate oil. This includes a full U.L. labeled certification test program for our Model CB 100 to 800 HP 4-pass firetube boiler series. We currently have over (20) third-party test reports which document compliance to these limits. In addition, we offer burners and burner retrofit kits for higher levels such as <12, <15 and <30 ppm NOx on natural gas. In the past three years we have sold hundreds of these units.

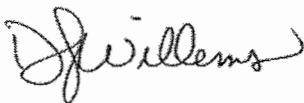
Therefore your NOx, and hence ozone, ambient concentrations can be reduced by simply tightening up your current regulations. This in itself may be enough to eliminate a non-attainment designation.

This equipment is available today and is very cost competitive, as evidenced by the number of units shipped and installed.

Finally, the San Joaquin area air district in CA took this approach about two years ago and reduced their limits to <9 ppm NOx for boilers over 20 MM BTH and <15 ppm NOx for boilers between 2 MM BTH and <20 MM BTH. They mandated that 25% of the boiler population was required to comply with these new regulations each year. They are currently in year two of this program with over (50) units completed and ozone reductions have occurred.

I would be happy to meet with you to discuss this option in detail. Feel free to call me at 414/438-5460 if you have any questions. I have enclosed some brochures on this equipment for your review.

Sincerely,



Daniel J. Willems, VP, Product Development

Enclosures

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AIR RESOURCES DIVISION

The Cleaver-Brooks Family Of Companies

Emission Test Data For Cleaver-Brooks
Ultra Low NOx Boilers And Burners

Table A

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
<i>< 9 ppm NOx requirements (natural gas)</i>								
1	Dart Container	5/27/05	NG	6.5	0.0079	0	3592	29.3 MM BTH Cleaver-Brooks NTI retrofit
			NG	6.5	0.0079	0	3872	
			NG	6.8	0.0082	0	3365	
2	San Joaquin General	5/18/05	NG	7.4	0.009	1.5	1941	20.9 MM BTH Cleaver-Brooks CEW retrofit
			NG	6.9	0.0084	8.5	2213	
			NG	8	0.0097	0.2	1717	
3	San Joaquin General	8/11/05	NG	6.6	0.008	0	3063	20.9 MM BTH Cleaver-Brooks, unit #2
			NG	6.8	0.0083	0	2376	
			NG	7	0.0085	0	2767	
4	San Joaquin General	8/11/05	NG	8.3	0.0101	0	2045	20.9 MM BTH Cleaver-Brooks, unit #1
			NG	7	0.0085	0	3611	
			NG	6.7	0.0082	0	3750	
5	Kraft General Foods	5/23/05	NG	4.4	0.0053	0	767	33.8 MM BTH IC NTD336 retrofit
			NG	4.8	0.0059	0	749	
			NG	5	0.0061	0	753	
6	Delano Growers Grape Products	5/31/05	NG	4.7	0.0058	1.3	1529	33.8 MM BTH Cleaver-Brooks NTI retrofit
			NG	4.7	0.0057	1	1542	
			NG	4.4	0.0053	1.4	1524	
7	CDI	8/20/03	NG	8.2	0.01	2.3	4175	61 MM BTH Natcom
			NG	8.3	0.01	3	4500	
			NG	7.9	0.0096	2.4	4269	
8	SK Foods	10/20/03	NG	5.4	0.0065	0	7737	89.1 MM BTH Natcom
			NG	5.3	0.0065	0	7618	
			NG	5.5	0.0067	0	7679	

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Table A

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
9	Recot Inc (Frito-Lay)	5/22/05	NG	7.7	0.0094	10	2771	72 MM BTH Natcom
			NG	8.4	0.0102	8.3	3605	
			NG	8.2	0.01	11.6	3625	
10	Boeing - LB, CA	3/25/04	NG	7.6		<10	4006	33.8 MM BTH Cleaver-Brooks CEW retrofit
11	Kraft Foods, Inc.	6/14/05	NG	8.4	0.0102	0	1955	14.7 MM BTH Cleaver-Brooks CEW retrofit
			NG	7.5	0.0091	0	1393	
			NG	7.6	0.0092	0	1642	
12	William Bolthouse Farms	6/24/05	NG	7.7	0.0094	0	3787	24.5 MM BTH Cleaver-Brooks NTI retrofit
			NG	7.5	0.0091	0	3386	
			NG	7.6	0.0092	0	3345	
13	Unilever Best Foods	5/11/05	NG	9.1	0.011	1.2	3818	85 MM BTH Natcom on B&W
			NG	8.5	0.0103	1.3	4512	
			NG	8.4	0.0103	1.3	2298	
14	Unilever Best Foods	7/21/04	NG	8.1	0.0098	1.6	5859	38 MM BTH Natcom on Nebraska Boiler
			NG	8	0.0097	1.9	5832	
			NG	7.8	0.0095	1.9	5831	
15	SJ Delta College	11/17/05	NG	7.9	0.0096	0	1430	20.9 MM BTH Cleaver-Brooks retrofit, unit #3
			NG	8.3	0.01	0	1006	
			NG	8.2	0.01	0	822	
16	SJ Delta College	11/17/05	NG	6.2	0.0075	0	3145	20.9 MM BTH Cleaver-Brooks retrofit, unit #2
			NG	7.5	0.0093	0	2379	
			NG	7.3	0.0089	2.8	797	
17	Morningstar West	6/14/05	NG	7.16	0.0092	2.47	216	26.8 MM BTH Burham Boiler retrofit
			NG	7.21	0.0092	1.65	170	
			NG	6.89	0.0088	1.07	242	

**Emission Test Data For Cleaver-Brooks
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Table A

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
18	<i>Nestle Food</i>	10/12/05	NG	5.7	0.0069	1.3	4783	29.4 MM BTH Hurst retrofit
				5.8	0.0070	0.1	4592	
				5.9	0.0072	0	4550	
19	<i>Hilmar Cheese</i>	11/18/05	NG	7	0.0072	2.2	4977	50.2 MM BTH Cleaver-Brooks
				7.3	0.0072	2.2	4713	
				7.4	0.0072	2.2	4431	
20	<i>Gilroy Foods</i>	8/29/05	NG	7.6	0.0092	10.1	3970	63 MM BTH Cleaver-Brooks
				7.8	0.0095	0	4745	
				8.3	0.0101	0	4663	
21	<i>Associated Feed</i>	8/31/05	NG	7.7	0.0093	1.4	417	19.4 MM BTH Hurst Boiler retrofit
				7.5	0.0091	0.6	1610	
				7.9	0.0095	0	1595	
22	<i>Patton State Hospital</i>	12/20/02	NG	6.8	0.0087	13	1053	12.2 MM BTH Cleaver-Brooks
				9.5	0.0121	0	2184	
				6.4	0.0082	0	3361	
23	<i>Los Gatos Tomato Products</i>	09/26/05	NG	7	0.0089	3.3	27,478	184 MM BTH B&W retrofit
				7.6	0.0097	3.5	27484	
				8.2	0.0105	3.4	27250	
24	<i>Inland Paperboard</i>	12/01/05	NG	8.7	0.0111	0	3186	20.9 MM BTH Cleaver-Brooks
				8.8	0.0113	0	2795	
				8.6	0.0110	0	3404	
25	<i>International Paper</i>	11/15/05	NG	8.3	0.0106	0.3	924	20.9 MM BTH Cleaver-Brooks
				8.1	0.0104	0.1	1152	
				8.2	0.0105	0	1541	

Emission Test Data For Cleaver-Brooks
Ultra Low NOx Boilers And Burners

Table B

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
<12 ppm NOx requirements (natural gas)								
1	Suputo Cheese - Southgate, CA	11/13/03	NG	9.8	0.0125	<1	732	16.7 MM BTH York Shipley Boiler
			NG	8.6	0.0110	<1	2084	
			NG	8.3	0.0106	<1	2752	
2	See's Candies	12/17/02	NG	11.1	0.0142	28	376	7 MM BTH Cleaver-Brooks FLX
			NG	10.3	0.0132	2	627	
			NG	9.9	0.0127	<1	1146	
3	Baxter Healthcare	10/10/02	NG	8.9	0.0114	<1	1254	20.9 MM BTH Cleaver-Brooks CEW
			NG	9.8	0.0125	<1	2464	
			NG	8.9	0.0114	<1	4873	
4	Leprino Foods	6/13/05	NG	9.9	0.012	0	2466	16.7 MM BTH Cleaver-Brooks retrofit
			NG	10.3	0.0125	0	2465	
			NG	10.6	0.0129	0	2456	
5	Maxco Supply	1/30/03	NG	11.1	0.0135	0	NA	19.9 MM BTH Cleaver-Brooks retrofit
			NG	11.6	0.0141	0	NA	
			NG	9.6	0.0117	27.3	NA	
6	Boeing - LB, CA	3/25/04	NG	9.2	0.0118	<10	1834	16.3 MM BTH Cleaver-Brooks
7	Boeing - LB, CA	3/25/04	NG	9.8	0.0125	<10	1850	16.3 MM BTH Cleaver-Brooks

Emission Test Data For Cleaver-Brooks
Ultra Low NOx Boilers And Burners

Table C

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
<15 ppm NOx requirements (natural gas)								
1	<i>E&J Gallo Winery</i>	5/19/05	NG	10.6	0.0129	2	1436	10.2 MM BTH Cleaver-Brooks
			NG	9.7	0.0118	3.9	1221	
			NG	8.5	0.0104	10.8	379	
2	<i>Cargill - Stockton</i>	5/26/05	NG	12.1	0.0147	0	1282	14.3 MM BTH Cleaver-Brooks
			NG	10.8	0.0131	0	1466	
			NG	10.2	0.0124	0	1591	
3	<i>Memorial Hospital North</i>	5/5/05	NG	10.9	0.0133	0	1684	14.7 MM BTH Cleaver-Brooks unit #1
			NG	10.9	0.0132	0	1753	
			NG	10.8	0.0131	0	1499	
4	<i>Foam Fabricators</i>	5/28/05	NG	7.7	0.0094	0.6	1980	12.6 MM BTH Cleaver-Brooks
			NG	7	0.0085	0	1277	
			NG	7.3	0.0089	0	1147	
5	<i>Modesto Junior College</i>	12/17/04	NG	11.8	0.0143	0	1655	12.6 MM BTH Iron Fireman boiler
			NG	12.1	0.0147	0	1345	
			NG	11.3	0.0138	0	1609	
6	<i>Georgia Pacific Corp</i>	5/31/05	NG	10.7	0.013	0.1	2203	16.3 MM BTH Cleaver-Brooks
			NG	10.6	0.0129	0.8	2473	
			NG	11.5	0.014	0	1811	
7	<i>Cargill - Turlock</i>	8/8/05	NG	13.8	0.0168	0	1173	14.7 MM BTH Cleaver-Brooks
			NG	13.4	0.0163	0	379	
			NG	12.4	0.0151	0	2726	
8	<i>Associated Feed</i>	9/20/05	NG	15	0.0182	0	1700	12.6 MM BTH Cleaver-Brooks unit #1
			NG	14.9	0.0181	0	1142	
			NG	14.3	0.0174	0	1702	

Emission Test Data For Cleaver-Brooks
Ultra Low NOx Boilers And Burners

Table C

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
<15 ppm NOx requirements (natural gas)								
9	Associated Feed	7/14/05	NG	11	0.0133	0	977	12.6 MM BTH Cleaver-Brooks unit #2
			NG	11.4	0.0139	0	1173	
			NG	11.9	0.0145	0	785	
10	Dart Container	3/2/06	NG	11.7	0.0142	0	2804	14.7 MM BTH East Boiler
			NG	11.9	0.0144	0	2443	
			NG	12.3	0.0149	0	2421	
11	Memorial Hospital North	1/17/06	NG	11.7	0.0143	0	2359	14.6 MM BTH Cleaver-Brooks unit #2
			NG	11.9	0.0145	0	2277	
			NG	11.9	0.0144	0	2241	

Emission Test Data For Cleaver-Brooks
Ultra Low NOx Boilers And Burners

Table D

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
<20 ppm NOx requirements (natural gas)								
1	Paramount Petroleum	12/22/05	NG	19.4	0.0236	0	1177	7.9 MM BTH Rooney Boiler unit #1
			NG	19.9	0.0242	0	1185	
			NG	18.2	0.0221	0	1157	
2	Paramount Petroleum	12/21/05	NG	18	0.0219	23	1318	7.9 MM BTH Rooney Boiler unit #2
			NG	16	0.0194	15	1244	
			NG	16.9	0.0205	9	1274	
3	Paramount Petroleum	12/21/05	NG	14.7	0.0179	0.7	2069	7.9 MM BTH Rooney Boiler unit #3
			NG	15.1	0.0183	0	2166	
			NG	14.3	0.0173	2.2	2092	

Emission Test Data For Cleaver-Brooks
Ultra Low NOx Boilers And Burners

Table E

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
<30 ppm NOx requirements (natural gas)								
1	Carpenter Company	05/20/05	NG	27	0.0328	0.3	735	6.3 MM BTH Cleaver-Brooks
			NG	27.2	0.0331	0.3	634	
			NG	27.7	0.0337	0.3	502	
2	Lactalis USA Turlock	05/21/05	NG	11.1	0.0135	0	947	8.4 MM BTH Superior Boiler
			NG	11.1	0.0135	0	1018	
			NG	11.1	0.0135	0	637	
3	Suputo Cheese - Southgate, CA	11/13/03	NG	22.7		<1	846	13.4 MM BTH Johnston Boiler
			NG	19.5		<1	1029	
			NG	18.1		<1	1275	
4	Paramount Petroleum	12/21/05	NG	23.2	0.0282	46	1934	13 MM BTH Broach Boiler unit #1
			NG	23.1	0.028	78	1874	
			NG	22.5	0.0273	104	1871	
5	Paramount Petroleum	12/21/05	NG	20.9	0.0254	10.5	1919	13 MM BTH Broach Boiler unit #2
			NG	20	0.0243	15.7	1967	
			NG	22.9	0.0278	0	2004	
6	Paramount Petroleum	12/21/05	NG	27.1	0.033	15.7	2113	13.6 MM BTH Kewanee Boiler
			NG	26.7	0.0325	7.7	2019	
			NG	25.8	0.0313	2.4	1986	
7	Bunge Foods	2/15/06	NG	20.1	0.033	0.3	1495	25.1 MM BTH Cleaver-Brooks
			NG	19.7	0.0325	0.3	1341	
			NG	19.9	0.0313	1.1	1175	

Emission Test Data For Cleaver-Brooks
Ultra Low NOx Boilers And Burners

Table F

	Date Tested	Fuel Type	NOx (ppm @ 3% O2)	NOx (lb/MM BTU)	CO (ppm @ 3% O2)	Flowrate (dscfm)	Type/Size	
< 40 ppm NOx requirements (Amber oil)								
1	Patton State Hospital - boiler #3	12/20/02	Amber oil	30.2	0.0387	<1	2583	20.9 MM BTH Cleaver-Brooks
			Amber oil	29.8	0.0382	<1	3156	
			Amber oil	24	0.0307	<1	4475	
2	See's Candies	12/17/02	Amber oil	28.4	0.0364	<1	1053	6 MM BTH Cleaver-Brooks M4
			Amber oil	26.6	0.0341	6	2184	
			Amber oil	28.1	0.0360	<1	3361	