



**Walter Wright, Jr.**  
wwright@mwlaw.com  
(501) 688.8839

# Zero-Emission Limits for Certain Commercial Food Ovens/Nitrogen Oxide: South Coast Air Quality Management District (California) Proposed Rule

08/16/2023

The South Coast Air Quality Management District (“South Coast AQMD”) is considering a proposed rule that would reduce nitrogen oxide (NOx) emissions and limit carbon monoxide emissions from commercial food ovens that require a South Coast AQMD permit for:

- REgional Clean Air Incentives Market (“RECLAIM”)
- Former RECLAIM
- Non-RECLAIM Facilities

The South Coast AQMD addresses the air quality control region encompassing Los Angeles, California.

The air quality control region is classified as severe nonattainment for the ozone National Ambient Air Quality Standard.

The proposed amended rule (1153.1) would address emissions of oxide of nitrogen from commercial food ovens. Permitted commercial food ovens would be subject to eventual zero-emission NOx limits where technology has been identified as technically feasible and cost-effective.

This rule would be applicable to manufacturers and operators of commercial food ovens, roasters, and smokehouses producing food and beverage products (NAICS 311 and 312).

A draft South Coast AQMD staff report states that 97 facilities with a total of 218 commercial food ovens regulated by PR 1153. 1 were identified. To meet the rule, the oven would have to shift to a zero-emission electric device once it is subject to this provision.

As would be expected, commercial bakeries in the area and their consultants have identified potential issues. These concerns include:

- Cost-effective analysis
- Electric oven availability
- Product quality and employee safety
- Electricity upgrades and electric load availability
- Timeline for regulatory review
- Emission leakage

Environmental organizations support the proposed rule, arguing:

- It is cost effective
- Disagreement with projections of natural gas future cost
- Health impact should be a focus

Links to the following documents can be downloaded below.

- [Proposed Amended Rule](#)
- [Draft Staff Report](#)
- [Communities for a Better Environment Comments](#)
- [American Bakers Association Comments](#)
- [York Engineer, LLC Comments](#)