State of Utah

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Governor

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Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN124670011-25

September 18, 2025

Jonathan Carter
Edwards Lifesciences LLC
12050 Lone Peak Parkway
Draper, UT 84020
jonathan_carter@edwards.com

Dear Mr. Carter:

Re: Intent to Approve: Modification to Approval Order DAQE-AN124670010-25 to Add One (1) Emergency Generator Engine and One (1) Boiler
Project Number: N124670011

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Christine Bodell,** as well as the DAQE number as shown on the upper right-hand corner of this letter. Christine Bodell, can be reached at (385) 290-2690 or cbodell@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:CB:jg

cc: Salt Lake County Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN124670011-25
Modification to Approval Order DAQE-AN124670010-25 to Add One (1) Emergency Generator Engine and One (1) Boiler

Prepared By
Christine Bodell, Engineer
(385) 290-2690
cbodell@utah.gov

Issued to
Edwards Lifesciences LLC - Medical Products Manufacturing

Issued On
September 18, 2025

New Source Review Section Manager
Alan D. Humpherys

TABLE OF CONTENTS

GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Edwards Lifesciences LLC

Source Name
Edwards Lifesciences LLC - Medical Products Manufacturing

Mailing Address
12050 Lone Peak Parkway
Draper, UT 84020

Physical Address
12050 Lone Peak Parkway
Draper, UT 84020

Source Contact
Name: Jonathan Carter
Phone: (801) 419-3158
Email: jonathan_carter@edwards.com

UTM Coordinates
423,926 m Easting
4,487,161 m Northing
Datum NAD83
UTM Zone 12

SIC code 3841 (Surgical & Medical Instruments & Apparatus)

SOURCE INFORMATION

General Description
Edwards Lifesciences LLC (Edwards Lifesciences) manufactures various medical products, including heart valve repair rings, heart valve delivery devices, cardioplegia sets, monitoring and infusion sets, and blood management products in Salt Lake County. Flexible tubing is bonded to hard joints and other parts using cement and bonding materials. An injection molding process is used to heat plastics that are pressed into molds to form various parts. The facility also includes five (5) emergency generator engines to allow the facility to remain operational in the event of a power loss.

NSR Classification
Minor Modification at Minor Source

Source Classification
Located in Northern Wasatch Front O3 NAA, Salt Lake City UT $PM_{2.5}$ NAA, Salt Lake County SO_2 NAA
Salt Lake County
Airs Source Size: B

Applicable Federal Standards
NSPS (Part 60), A: General Provisions
NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
MACT (Part 63), A: General Provisions
MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Project Description
Edwards Lifesciences has requested a modification to AO DAQE-AN124670010-25, issued June 2, 2025, to add one (1) 2,000 kW (3,058 hp) diesel-fuel emergency generator engine and one (1) 6 MMBtu/hr natural gas-fired boiler.

Edwards Lifesciences has also requested to add one (1) new dust collector to its laser grinding operations, in addition to the one permitted under Equipment ID II.A.4. The laser grinding operations at the facility are not increasing. The additional dust collector will allow for flexibility for when the grinding operations are moved to a different building within the property boundary and is a high-vacuum dust collector with a 99.9% control efficiency to 3 microns.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO_2 Equivalent	1594.86	2049.00
Carbon Monoxide	1.96	3.69
Nitrogen Oxides	1.62	4.70
Particulate Matter - PM_{10}	0.15	0.30
Particulate Matter - $PM_{2.5}$	0.15	0.30
Sulfur Dioxide	0.01	0.08
Volatile Organic Compounds	0.17	18.25

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Ethylene Glycol (CAS #107211)	0	300
Generic HAPs (CAS #GHAPS)	5	670
Hexane (CAS #110543)	46	101
Methanol (CAS #67561)	0	100
Methyl Isobutyl Ketone (Hexone) (CAS #108101)	0	2
Naphthalene (CAS #91203)	0	24
Xylenes (Isomers And Mixture) (CAS #1330207)	0	14
	Change (TPY)	**Total (TPY)**
Total HAPs	0.03	0.61

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in the Salt Lake Tribune and Deseret News on September 21, 2025. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15

days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]
I.8	The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A THE APPROVED EQUIPMENT

II.A.1	**Medical Products Manufacturer** Source Wide
II.A.2	**400 kW (536.4 hp) Emergency Generator** Location: Draper DC Building Quantity: One (1) Fuel: Diesel Manufacture Date: 2019 Applicable NSPS: Subpart IIII Applicable MACT: Subpart ZZZZ
II.A.3	**1,371 kW (1,839 hp) Emergency Generators** Location: Draper 1 Building Quantity: Three (3) Fuel: Diesel Manufacture Date: 2024 EPA Certification: Tier 2 Applicable NSPS: Subpart IIII Applicable MACT: Subpart ZZZZ
II.A.4	**2,000 kW (3,058 hp) Emergency Generator (NEW)** Location: Draper 2 Building Quantity: One (1) Fuel: Diesel Manufacture Date: 2024 EPA Certification: Tier 2 Applicable NSPS: Subpart IIII Applicable MACT: Subpart ZZZZ
II.A.5	**Two (2) Dust Collectors (1 New)** Dust Collector #1: Location: Draper 1 Building Dust Collector #2 (NEW): Location: Draper 2 Building Efficiency: 99.9% Control Efficiency Both dust collectors control emissions from grinding operations
II.A.6	**Two (2) Electric Belt Furnaces** Location: Draper 2 Building Hydrogen treatment Electronic igniter to burn excess hydrogen
II.A.7	**Electro Polishers** Location: Draper 2 Building Polishing tanks

II.A.8	**Seven (7) Water Scrubber Fume Hoods** Location: Draper 2 Building No Unit Applicable Requirements
II.A.9	**Machine Shop** Location: Draper 1 Building Internally vented abrasive blaster and grinders Four (4) internally vented fabric filters Listed for informational purposes only
II.A.10	**6.0 MMBtu/hr Boiler (NEW)** Location: Draper 2 Building Fuel: Natural Gas Control: Low NO_x burner, rated <9 ppm

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Site-wide Requirements**
II.B.1.a	Unless otherwise specified in this AO, the owner/operator shall not allow visible emissions from any stationary point or fugitive emission source associated with the source or with the control facilities on site to exceed 20% opacity. [R307-305]
II.B.1.a.1	Unless otherwise specified in this AO, opacity observations of emission from stationary sources shall be conducted in accordance with 40 CFR 60, appendix A, Method 9. [R307-401-8]
II.B.1.b	The owner/operator shall install and operate a dust collector to control particulate emissions from the grinding operations. All exhaust air from the grinding operations shall be routed to the dust collector before being vented to the atmosphere. [R307-401-8]
II.B.1.c	The owner/operator shall not allow visible emissions from the dust collectors to exceed 10% opacity. [R307-401-8]
II.B.2	**VOC & HAP Requirements**
II.B.2.a	The owner/operator shall not emit more than the following from evaporative sources (painting, printing, coating, and/or cleaning) on site: 18.0 tons of VOC per rolling 12-month total 0.58 tons of all HAPs combined per rolling 12-month total. [R307-401-8]

II.B.2.a.1	The owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. The owner/operator shall use a mass-balance method to calculate emissions from evaporative sources. The owner/operator may use the following equations with applicable units to comply with the mass-balance method: VOCs = [% VOCs by Weight/100] x [Density] x [Volume Consumed] HAP = [% HAP by Weight/100] x [Density] x [Volume Consumed] [R307-401-8]
II.B.2.a.2	The owner/operator shall use a mass-balance method to quantify any amount of VOCs and HAPs reclaimed. The owner/operator shall subtract the amount of VOCs and HAPs reclaimed from the quantities calculated above to provide the monthly total emissions of VOCs and HAPs. [R307-401-8]
II.B.2.a.3	The owner/operator shall keep records each month of the following: A. The name (as per SDS) of the VOC- and HAP-emitting material B. The maximum percent by weight of VOCs and each HAP in each material used C. The density of each material used D. The volume of each VOC- and HAP-emitting material used E. The amount of VOCs and the amount of each HAP emitted from each material F. The amount of VOCs and the amount of each HAP reclaimed and/or controlled from each material G. The total amount of VOCs, the total amount of each HAP, and the total amount of all HAPs combined emitted from all materials (in tons). [R307-401-8]
II.B.2.b	The owner/operator shall comply with the applicable requirements of Utah Administrative Code Rule R307-304: Solvent Cleaning and Rule R307-353: Plastic Parts Coatings. [R307-401-8]
II.B.3	**Electric Belt Furnaces**
II.B.3.a	The owner/operator shall not operate the incinerators on the electric belt furnaces for more than 4,400 hours combined per rolling 12-month period. [R307-401-8]
II.B.3.a.1	The owner/operator shall: A. Determine hours of operation by monitoring and maintaining an operations log B. Record hours of operation each day C. Use the hours of operation to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12-months. [R307-401-8]

II.B.4	**Diesel-Fired Emergency Generators**
II.B.4.a	The owner/operator shall certify that the 2,000 kW (3,058 hp) emergency generator engine and each 1,371 kW (1,839 hp) emergency generator engine installed on site has a NO_x+NMHC emission rate of 6.50 g/kW-hr (4.8 g/hp-hr) or less, a CO emission rate of 3.5 g/kW-hr (2.6 g/hp-hr) or less, and a PM emission rate of 0.20 g/kW-hr (0.15 g/hp-hr) or less at the exhaust point. [R307-401-8]
II.B.4.a.1	To demonstrate compliance with the above condition, the owner/operator shall either: A. Purchase a stationary internal combustion engine which has obtained certification as defined in 40 CFR 1039.801; or B. Conduct an initial performance test according to 40 CFR part 1039. [R307-401-8]
II.B.4.b	The owner/operator shall not operate each emergency engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engines during emergencies. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.4.b.1	To determine compliance with the above rolling 12-month total, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records documenting the operation of each emergency engine shall be kept in a log and shall include the following: A. The date the emergency engine was used B. The duration of operation in hours C. The reason for the emergency engine usage. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.4.b.2	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for each emergency engine. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.4.c	The owner/operator shall only use diesel fuel (e.g., fuel oil #1, #2, or diesel fuel oil additives) as fuel in each emergency engine. [R307-401-8]
II.B.4.c.1	The owner/operator shall only combust diesel fuel that meets the definition of ultra-low sulfur diesel (ULSD). [R307-401-8]
II.B.4.c.2	To demonstrate compliance with the ULSD fuel requirement, the owner/operator shall maintain records of diesel fuel purchase invoices or obtain certification of sulfur content from the diesel fuel supplier. The diesel fuel purchase invoices shall indicate that the diesel fuel meets the ULSD requirements. [R307-401-8]
II.B.4.d	The owner/operator shall not operate more than one (1) emergency generator engine at a time for testing, maintenance, or any other non-emergency purposes. [R307-410-4]
II.B.4.e	The owner/operator shall not operate any emergency generator engine on site for maintenance, testing, or any other non-emergency purposes before 10:00 am or after 4:00 pm each day. [R307-410-4]
II.B.4.f	The owner/operator shall not operate the 400 kW emergency generator engine more than once per week for maintenance, testing, or any other non-emergency purposes. [R307-410-4]

II.B.4.f.1	To show compliance with the above three (3) conditions (II.B.4.d - II.B.4.f), the owner/operator shall keep and maintain the following records for all periods each emergency generator engine on site is in operation for maintenance, testing, or any other non-emergency purposes: A. Date and time maintenance and testing operations begin for each engine B. Date and time maintenance and testing operations end for each engine C. Record which emergency engine was maintained and tested D. Maintain records of maintenance and testing on a daily basis. [R307-410-4]
II.B.5	**Boiler Requirements**
II.B.5.a	The owner/operator shall only use natural gas as fuel in the 6 MMBtu/hr boiler. [R307-401-8]
II.B.5.b	The owner/operator shall not operate the 6.0 MMBtu/hr boiler for more than 4,380 hours per rolling 12-month period. [R307-401-8]
II.B.5.b.1	The owner/operator shall: A. Determine hours of operation by monitoring and maintaining an operations log B. Record hours of operation each day C. Use the hours of operation to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12 months D. Keep hours of operation records for all periods the plant is in operation. [R307-401-8]
II.B.5.c	The 6 MMBtu/hr boiler shall be equipped with an ultra-low NO_x burner that shall emit a concentration of no more than 9 ppmvd of NO_x. [R307-316, R307-401-8]
II.B.5.c.1	To determine compliance with the ultra-low NO_x burner, the owner/operator shall obtain a manufacturer certification of compliance with the 9 ppm NO_x concentration limit. The owner/operator shall maintain records of the burner NO_x rating certification for the life of the equipment. [R307-401-8]
II.B.5.d	The owner/operator shall comply with all applicable requirements of UAC Rule R307-316: NO_x and CO Emission Controls for Natural Gas-Fired Boilers Greater Than 5.0 MMBtu. [R307-316]

PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes	AO DAQE-AN124670010-25 dated June 2, 2025
Is Derived From	NOI dated June 11, 2025
Incorporates	DAQE-MN124670011-25 dated August 14, 2025

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO_x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds