State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN104060021-25

October 23, 2025

William Spencer
Snowbird Resort LLC
3165 East Millrock Drive, Suite 150
Snowbird, UT 84121
wspencer@snowbird.com

Dear Mr. Spencer:

Re: Intent to Approve: Modification to Approval Order DAQE-AN104060019-24 to Update Equipment List
Project Number: N104060021

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,

Jon L. Black
Jon Black (Oct 21, 2025 07:28:03 MDT)

Jon L. Black, Manager
New Source Review Section

JLB:CB:jg

cc: Salt Lake County Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN104060021-25
Modification to Approval Order DAQE-AN104060019-24
to Update Equipment List

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

Issued to
Snowbird Resort LLC - Snowbird Ski and Summer Resort

Issued On
October 23, 2025

Jon Black (Oct 21, 2025 07:28:03 MDT)

New Source Review Section Manager
Jon L. Black

TABLE OF CONTENTS

GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Snowbird Resort LLC

Source Name
Snowbird Resort LLC - Snowbird Ski and Summer Resort

Mailing Address
3165 East Millrock Drive, Suite 150
Snowbird, UT 84121

Physical Address
Cliff Lodge
Snowbird, UT 84092

Source Contact
Name: William Spencer
Phone: (385) 421-8305
Email: wspencer@snowbird.com

UTM Coordinates
444,374 m Easting
4,492,484 m Northing
Datum NAD83
UTM Zone 12

SIC code 7011 (Hotels & Motels)

SOURCE INFORMATION

General Description
Snowbird Resort LLC (Snowbird) is located in an unincorporated community in Little Cottonwood Canyon in the Wasatch Range of the Rocky Mountains. Little Cottonwood Canyon is primarily in Salt Lake County. Snowbird is a year-round ski and summer resort that has ten (10) chairlifts, a surface lift, an aerial tram, and a 600-foot tunnel enclosing a one-way conveyor lift connection from Peruvian Gulch to Mineral Basin. Snowbird requires power-generating units to provide electricity and heating for a 562-room hotel and conference center, employee housing, fire station, parking structure, drain tunnel, restaurants, two (2) heated swimming pools, four (4) hot tubs, and piping that keeps sidewalks clear of snow.

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: SM

Applicable Federal Standards
NSPS (Part 60), A: General Provisions
NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

NSPS (Part 60), JJJJ: Standards of Performance for Stationary Spark 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
Snowbird is requesting to replace one (1) 140 hp, natural gas-fired emergency engine (listed in AO DAQE-AN104060019-24, Equipment ID#II.A.6) with one (1) 167 hp, diesel-fired emergency engine. The new engine is certified to meet USEPA Tier 3 emissions standards.

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	18	47191.00
Carbon Monoxide	0	24.84
Nitrogen Oxides	-0.06	48.35
Particulate Matter - PM_{10}	0	1.30
Particulate Matter - $PM_{2.5}$	0	1.30
Sulfur Dioxide	-0.01	0.57
Volatile Organic Compounds	0.01	13.44

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
1,1,2,2-Tetrachloroethane (CAS #79345)	0	19
1,1,2-Trichloroethane (CAS #79005)	0	15
1,3-Butadiene (CAS #106990)	0	125
1,3-Dichloropropene (CAS #542756)	0	12
2,2,4-Trimethylpentane (CAS #540841)	0	117
Acetaldehyde (CAS #75070)	0	3913
Acrolein (CAS #107028)	0	2405
Benzene (Including Benzene From Gasoline) (CAS #71432)	0	210
Biphenyl (CAS #92524)	0	99
Carbon Tetrachloride (CAS #56235)	0	17
Chlorobenzene (CAS #108907)	0	14
Chloroform (CAS #67663)	0	13
Ethyl Benzene (CAS #100414)	0	19
Ethylene Dibromide (Dibromoethane) (CAS #106934)	0	21
Formaldehyde (CAS #50000)	-2	7222
Generic HAPs (CAS #GHAPS)	0	14
Hexane (CAS #110543)	0	989
Methanol (CAS #67561)	0	1170
Naphthalene (CAS #91203)	0	35
PAH, Total (CAS #234)	0	13
Phenol (CAS #108952)	0	11

Polycyclic Organic Matter (CAS #246)	0	29
Styrene (CAS #100425)	0	11
Toluene (CAS #108883)	0	193
Xylenes (Isomers And Mixture) (CAS #1330207)	0	87
	Change (TPY)	**Total (TPY)**
Total HAPs	0	8.39

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 on October 25, 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	**Snowbird Resort** Year-round Ski and Summer Resort
II.A.2	**Three (3) Natural Gas-fired Generator Sets** Generator Set (ICE-01) Capacity: 2912 bhp Pollution Control: Oxidation Catalyst Generator Set (ICE-02) Capacity: 2912 bhp Pollution Control: Oxidation Catalyst Generator Set (ICE-03) Capacity: 1804 bhp Pollution Control: Oxidation Catalyst
II.A.3	**Four (4) Natural Gas-fired Boilers** Boiler (B-03) Plaza Capacity: 8.37 MMBTU/hr Boiler (B-04) Snowbird Lodge Capacity: 8.37 MMBTU/hr Boiler (B-05) Inn Lodge Capacity: 5.23 MMBTU/hr Boiler (B-06) Iron Blossom Lodge Capacity: 8.37 MMBTU/hr

II.A.4	**Eighteen (18) Diesel-Fired Emergency Generators** Site-wide rating required for emergency generator engines Cumulative site-wide rating: 6,268 hp (One (1) new 167 hp engine) Maximum rating: 1,046 hp Minimum rating: 100 hp
II.A.5	**Emergency Generator Gasoline Operated** One (1) 165 hp engine, Chickadee Lift (IC-09) Installation Year: 1972
II.A.6	**Used Oil Burner** One (1) used oil burner, Maintenance Building
II.A.7	**Exempt Activities** Various natural gas-fired fireplaces, furnaces, boilers, and water heaters less than 5 MMBTU/hr
II.A.8	**Degreaser** One (1) metal parts cleaner, Maintenance Building (PC-01)

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	Visible emissions from the following emission points shall not exceed the following values: A. All boiler exhaust stacks - 10% opacity B. All natural gas or propane fired engines - 10% opacity C. All standby generator or auxiliary power units -20% opacity after warm-up (15-20 minutes) D. All other points - 20% opacity. [R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [40 CFR 60]

II.B.2	**IC Testing Requirements**
II.B.2.a	The owner/operator shall not emit more than the following rates and concentrations from ICE-1, 2, and 3: Per Stack: NO_x: 0.5 g/bhp-hr CO: 0.178 g/bhp-hr [R307-401-8]
II.B.2.a.1	**Initial Test** The owner/operator shall conduct an initial stack test on the emission unit within 180 days after startup of the emission unit. [R307-165-2]
II.B.2.a.2	**Test Frequency** The owner/operator shall conduct a stack test on the emission unit within three (3) years after the date of the most recent stack test of the emission unit. The Director may require the owner/operator to perform a stack test at any time. [R307-165-2, R307-401-8]
II.B.2.a.3	**Notification** At least 30 days prior to conducting a stack test, the owner/operator shall submit a source test protocol to the Director. The source test protocol shall include the items contained in R307-165-3. If directed by the Director, the owner/operator shall attend a pretest conference. [R307-165-3, R307-401-8]
II.B.2.a.4	**Testing & Test Conditions** The owner/operator shall conduct testing according to the approved source test protocol and according to the test conditions contained in R307-165-4. [R307-165-4, R307-401-8]
II.B.2.a.5	**Reporting** No later than 60 days after completing a stack test, the owner/operator shall submit a written report of the results from the stack testing to the Director. The report shall include validated results and supporting information. [R307-165-5, R307-401-8]
II.B.2.a.6	**Possible Rejection of Test Results** The Director may reject stack testing results if the test did not follow the approved source test protocol or for a reason specified in R307-165-6. [R307-165-6, R307-401-8]
II.B.2.b	**Test Methods** When performing stack testing, the owner/operator shall use the appropriate EPA-approved test methods as acceptable to the Director. Acceptable test methods for pollutants are listed below. [R307-401-8]
II.B.2.b.1	**Standard Conditions** A. Temperature - 68 degrees Fahrenheit (293 K) B. Pressure - 29.92 in Hg (101.3 kPa) C. Averaging Time - As specified in the applicable test method. [40 CFR 60 Subpart A, 40 CFR 63 Subpart A, R307-401-8]
II.B.2.b.2	**NO_x** 40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8]

II.B.2.b.3	**CO** 40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8]
II.B.2.c	The three (3) natural gas-fired generators (ICE-1, 2, and 3) stack heights shall be 52.5 feet or higher, measured from the ground elevation of the co-gen building. [R307-401-8]
II.B.3	**Natural Gas-Fired Boiler Requirements**
II.B.3.a	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]
II.B.4	**Requirements for Emergency Generators**
II.B.4.a	The owner/operator shall not exceed 6,268 HP in site-wide, diesel-fired emergency generator engine power output capacity. [R307-401]
II.B.4.a.1	To determine compliance with the site-wide power capacity, the owner/operator shall maintain a record of all diesel-fired emergency engines on site that includes the following for each engine: A. Maximum engine HP B. Engine model year C. Date of installation. [R307-401]
II.B.4.b	The owner/operator shall use the emergency generator engines only during the periods when electric power from the public utilities is interrupted or for regular maintenance and testing of the engines. [R307-401-8]
II.B.4.c	Each emergency generator engine shall not exceed 100 hours of operation per rolling 12-month period for maintenance checks and readiness testing. There is no time limit on the use of the engines during emergencies. [R307-401-8]
II.B.4.c.1	To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth 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 generator engine was used; B. The duration of operation each day in hours; and C. The reason for the emergency generator engine usage. [R307-401-8]
II.B.5	**Fuel Requirements**
II.B.5.a	The owner/operator shall only use natural gas as a primary fuel in the three (3) auxiliary generators (ICE-1, ICE-2, ICE-3) and four (4) boilers (B-03, B-04, B-05, B-06). The emergency generator (IC-09) shall only use gasoline as fuel. [R307-401-8]
II.B.5.b	The owner/operator shall only use diesel fuel (fuel oil #1, #2, or diesel fuel oil additives) in the emergency generators (II.A.4). All diesel burned shall meet the definition of ultra-low sulfur diesel (ULSD) and contain no more than 15 ppm sulfur. [40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ]

II.B.5.b.1	To demonstrate compliance with the fuel oil requirements, the owner/operator shall keep and maintain fuel purchase invoices. The fuel purchase invoices shall indicate that the diesel fuel meets the ULSD requirements, or the owner/operator shall obtain certification of sulfur content from the fuel supplier. [40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ]
II.B.6	**Degreaser Requirements**
II.B.6.a	The owner/operator shall comply with all applicable requirements of UAC Rule R307-335: Degreasing. [R307-335]
II.B.7	**Used Oil Burner Requirements**
II.B.7.a	The used oil burner used for energy recovery shall comply with the following: A. The concentration/parameters of contaminants in any used oil fuel shall not exceed the following levels: Arsenic 5 ppm by weight Cadmium 2 ppm by weight Chromium 10 ppm by weight Lead 100 ppm by weight Total halogens 1,000 ppm by weight Sulfur 0.5 percent by weight B. The flash point of all used oil to be burned shall not be less than 100 degrees F. C. The owner/operator shall provide test certification for used oil fuel. Certification shall be either by their own testing or test reports from the used oil fuel marketer. Records of used oil fuel consumption, and the test reports shall be kept for all periods when the plant is in operation. D. Used oil that does not exceed any of the listed contaminant contents may be burned. The owner/operator shall record the quantities of oil burned on a daily basis. E. Any used oil fuel that contains more than 1000 ppm by weight of total halogens shall be considered a hazardous waste and shall not be burned in the boiler. The oil shall be tested for halogen content by ASTM Method D-808-81, EPA Method 8240 or Method 8260 before used oil fuel is transferred to the boiler tank and burned. [R307-401-8]

PERMIT HISTORY

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

Supersedes	AO DAQE-AN104060019-24 dated June 27, 2024
Is Derived From	NOI dated August 11, 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