State of Utah

SPENCER J. COX
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Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN131060010-26

April 20, 2026

Justin Ivy
Hunter Panels LLC
1285 Ritner Highway
Carlisle, PA 17013
justin.ivy@carlisleccm.com

Dear Mr. Ivy:

Re: Intent to Approve: Modification to Approval Order DAQE-AN131060008-24 to Update Equipment and Increase VOC Emissions
Project Number: N131060010

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, **Dungan Adams,** as well as the DAQE number as shown on the upper right-hand corner of this letter. Dungan Adams, can be reached at (385) 290-2474 or dunganadams@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:DA:jg

cc: Tooele County Health Department
EPA Region 8

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN131060010-26
Modification to Approval Order DAQE-AN131060008-24 to Update Equipment and Increase VOC Emissions

Prepared By
Dungan Adams, Engineer
(385) 290-2474
dunganadams@utah.gov

Issued to
Hunter Panels LLC - Tooele Foam Panel Manufacturing Plant

Issued On
April 20, 2026

New Source Review Section Manager
Alan D. Humpherys

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Hunter Panels LLC

Source Name
Hunter Panels LLC - Tooele Foam Panel Manufacturing Plant

Mailing Address
1285 Ritner Highway
Carlisle, PA 17013

Physical Address
501 South Emerald Road
Tooele, UT 84074

Source Contact
Name: Justin Ivy
Phone: (949) 473-8769
Email: justin.ivy@carlisleccm.com

UTM Coordinates
386,465 m Easting
4,486,193 m Northing
Datum NAD83
UTM Zone 12

SIC code 3086 (Plastics Foam Products)

SOURCE INFORMATION

General Description
Hunter Panels, LLC (Hunter Panels) operates a foam insulating panel manufacturing plant located in Tooele County. The plant produces rigid polyisocyanurate foam panels. Pentane is used as a blowing agent for the panel process line, which consists of a pour table, a metering roll, a laminator, and various cutting operations. A regenerative thermal oxidizer is used to control pentane emissions from the panel process line. Cutting operations are controlled using baghouses. The plant also includes various natural gas-fired combustion equipment less than 5 MMBtu/hr, various storage tanks, and a parts washer. After the panels are manufactured, they are bundled, wrapped, and stored before being shipped offsite. The panel warehouse storage accounts for the majority of the emissions at the plant, as pentane is slowly released from the stored product. The warehouse emissions are determined to be fugitive VOCs and do not count towards the major source threshold.

NSR Classification
Minor Modification at Minor Source

Source Classification
Located in Salt Lake City UT $PM_{2.5}$ Maintenance Area, Northern Wasatch Front O3 NAA
Tooele County
Airs Source Size: SM

Applicable Federal Standards
None

Project Description
Hunter Panels has proposed the following modifications to AO DAQE-AN131060008-24:

1. Replace the existing 2.5 MMBtu/hr laminator with a 2.18 MMBtu/hr laminator.
2. Add pour area emission point.
3. Increase fugitive VOC emissions to account for warehouse panel storage.
4. Re-calculate site-wide emission estimates.

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	-167.69	6788.19
Carbon Monoxide	-0.12	4.75
Nitrogen Oxides	-0.13	5.66
Particulate Matter - PM_{10}	-0.01	2.39
Particulate Matter - $PM_{2.5}$	-0.01	2.39
Sulfur Dioxide	0	0.03
Volatile Organic Compounds	98.01	132.81

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Generic HAPs (CAS #GHAPS)	-9	220
Methylene Diphenyl Diisocyanate (MDI) (CAS #101688)	0	5
	Change (TPY)	**Total (TPY)**
Total HAPs	-0.01	0.11

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 Tooele Transcript on April 22, 2026. 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. Inventories, Testing and Monitoring. [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	**Foam Insulation Panel Manufacturing Plant**
II.A.2	**Process Line** Includes: Pour table, laminator, side trim/crosscut station, and the gang saw station
II.A.3	**One (1) Regenerative Thermal Oxidizer (RTO)** Controls VOC emissions from foam panel manufacturing process Rating: 2.2 MMBtu/hr
II.A.4	**One (1) Main Baghouse** Controls cutting operations Rating: 22,500 scfm
II.A.5	**One (1) Cool Vent Baghouse** Controls offline cutting equipment of the cool vent process Rating: 5,000 scfm
II.A.6	**One (1) Laminator (New)** Rated at 2.18 MMBtu/hr
II.A.7	**One (1) Natural Gas-Fired Boiler** Rated at 2.0 MMBtu/hr
II.A.8	**One (1) Solvent-Based Parts Washer**
II.A.9	**Warehouse Storage (New)** Includes: Panel storage
II.A.10	**Various Comfort Heaters** Fuel: Natural gas Rating: <5 MMBtu/hr each
II.A.11	**Various Storage Tanks**

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	The owner/operator shall not consume more than 6,307,200 lbs of pentane per rolling 12-month period. [R307-401-8]

II.B.1.a.1	To determine compliance with a rolling 12-month total, the owner/operator shall: A. Determine pentane consumption from supervisor monitoring and maintaining an operations log. B. Record pentane consumption on a daily basis. C. Use the pentane consumption data to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12 months. D. Keep pentane consumption records for all periods when the plant is in operation. [R307-401-8]
II.B.1.b	Visible emissions from the following emission points shall not exceed the following values: A. The RTO - 10% opacity. B. All other points - 10% opacity. [R307-401-8]
II.B.1.b.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [40 CFR 60, R307-401-8]
II.B.1.c	The owner/operator shall comply with all applicable solvent cleaning and degreasing conditions in R307-304 and R307-335. [R307-304, R307-335]
II.B.1.d	The owner/operator shall not exhaust pentane emissions from the 2.18 MMBtu/hr laminator directly to the atmosphere for more than 100 hours per rolling 12-month period. [R307-401-8]
II.B.1.d.1	The owner/operator shall: A. Determine the hours of uncontrolled laminator emissions by recording the number of hours the high-temperature exhaust was open while pentane was present in the laminator. B. Record the hours of uncontrolled emissions from the laminator each day. C. Use the uncontrolled laminator emission data to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12 months. D. Keep the records of uncontrolled laminator emissions for all periods the plant is in operation. [R307-401-8]
II.B.2	**RTO Limitations**
II.B.2.a	The owner/operator shall use an RTO to control VOC emissions from the foam panel manufacturing process. The owner/operator shall route all exhaust air from the foam panel manufacturing process, apart from the high-temperature laminator exhaust and fugitive emissions from the process line, through the RTO before being vented to the atmosphere. [R307-401-8]
II.B.2.a.1	The owner/operator shall operate and maintain the RTO in accordance with the manufacturer's instructions and/or recommendations. [R307-401-8]

II.B.2.a.2	The owner/operator shall operate the RTO at all times except during breakdowns, as specified in R307-107. [R307-107, R307-401-8]
II.B.2.b	The owner/operator shall use a baghouse (Item II.A.4) to control emissions from cutting operations. The owner/operator shall route all capturable particulate emissions from cutting operations through this baghouse before being vented to the RTO. [R307-401-8]
II.B.2.c	The owner/operator shall use a cool vent baghouse (Item II.A.5) to control emissions from the offline cutting equipment of the cool vent process. The owner/operator shall route all exhaust air from the cool vent process through this cool vent baghouse before being vented to the atmosphere. [R307-401-8]
II.B.2.d	The owner/operator shall install a manometer or magnehelic pressure gauge to measure the differential pressure across each baghouse. [R307-401-8]
II.B.2.d.1	The pressure gauge shall be located such that an inspector/operator can safely read the indicator at any time. [R307-401-8]
II.B.2.d.2	The pressure gauge shall measure the pressure drop in 1-inch water column increments or less. [R307-401-8]
II.B.2.e	During operation of the baghouse, the owner/operator shall maintain the static pressure drop within the range recommended by the manufacturer for normal operations. [R307-401-8]
II.B.2.f	The owner/operator shall calibrate the pressure gauge in accordance with the manufacturer's instructions and/or recommendations. [R307-401-8]
II.B.3	**Stack Testing Requirements**
II.B.3.a	**The owner/operator shall conduct any stack testing required by this AO according to the following conditions**. [R307-401-8]
II.B.3.a.1	**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.3.a.2	**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.3.a.3	**Access** The owner/operator shall provide Occupational Safety and Health Administration (OSHA)- or Mine Safety and Health Administration (MSHA)-approved access to the test location. [R307-401-8]
II.B.3.a.4	**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.3.a.5	**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.3.a.6	**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.3.b	**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.3.b.1	**VOC** 40 CFR 60, Appendix A, Method 18; Method 25; Method 25A; 40 CFR 63, Appendix A, Method 320; or other EPA-approved testing method as acceptable to the Director. [R307-401-8]
II.B.4	**RTO-Specific Conditions**
II.B.4.a	The owner/operator shall not emit more than the following rates and concentrations from the **RTO**: Pollutant — lb/hr VOC — 1.0 [R307-401-8]
II.B.4.a.1	**Compliance Demonstration** To demonstrate compliance with the emission limitations above, the owner/operator shall perform stack testing on the emissions unit according to the stack testing conditions contained in this AO. [R307-165-2, R307-401-8]
II.B.4.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]

PERMIT HISTORY

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

Supersedes	AO DAQE-AN131060008-24 dated May 15, 2024
Is Derived From	NOI dated October 1, 2025
Incorporates	Additional Information dated April 22, 2025
Incorporates	Additional Information dated May 19, 2025
Incorporates	Additional Information dated July 5, 2025
Incorporates	Additional Information dated November 5, 2025
Incorporates	Additional Information dated January 6, 2026
Incorporates	Additional Information dated January 13, 2026
Incorporates	Additional Information dated March 4, 2026
Incorporates	Additional Information dated April 1, 2026

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