State of Utah
SPENCER J. COX
Governor
DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality
Tim Davis
Commissioner
DIVISION OF AIR QUALITY
Bryce C. Bird
Director

RN159570004

August 11, 2026

Luke Freeman
Pitman Farms
1075 North Avenue
Sanger, CA 93657
lfreeman@norbest.com

Dear Luke Freeman,

Re: Engineer Review: Modification to AO DAQE-AN159570003-26 to Install a 35.7 MMBtu/hr Boiler
Project Number: N159570004

The DAQ requests a company representative review and sign the attached Engineer Review (ER). This ER identifies all applicable elements of the New Source Review permitting program. Pitman Farms should complete this review within **10 business days** of receipt.

Pitman Farms should contact **Mr. Tim DeJulis** at (385) 306-6523 if there are questions or concerns with the review of the draft permit conditions. Upon resolution of your concerns, please email **Mr. Tim DeJulis** at **tdejulis@utah.gov** the signed cover letter. Upon receipt of the signed cover letter, the DAQ will prepare an ITA for a 30-day public comment period. At the completion of the comment period, the DAQ will address any comments and will prepare an Approval Order (AO) for signature by the DAQ Director.

If Pitman Farms does not respond to this letter within **10 business days,** the project will move forward without source concurrence. If Pitman Farms has concerns that cannot be resolved and the project becomes stagnant, the DAQ Director may issue an Order prohibiting construction.

Approval Signature: _____, 9/12/2026
(Signature & Date)

195 North 1950 West • Salt Lake City, UT
Mailing Address: P.O. Box 144820 • Salt Lake City, UT 84114-4820
Telephone (801) 536-4000 • Fax (801) 536-4099 • T.D.D. (801) 903-3978
www.deq.utah.gov
Printed on 100% recycled paper

UTAH DIVISION OF AIR QUALITY
ENGINEER REVIEW

SOURCE INFORMATION

Project Number	N159570004
Owner Name	Pitman Farms
Mailing Address	1075 North Avenue Sanger, CA, 93657
Source Name	Pitman Farms - Moroni Turkey Processing Plant
Source Location	350 South 300 West Moroni, UT 84646
UTM Projection	449,278 m Easting, 4,374,457 m Northing
UTM Datum	NAD83
UTM Zone	UTM Zone 12
SIC Code	2015 (Poultry Slaughtering & Processing)
Source Contact	Luke Freeman
Phone Number	(435) 314-9862
Email	lfreeman@pitmanfarms.com
Billing Contact	Luke Freeman
Phone Number	(435) 314-9862
Email	lfreeman@pitmanfarms.com
Project Engineer	Mr. Tim DeJulis, Engineer
Phone Number	(385) 306-6523
Email	tdejulis@utah.gov
Notice of Intent (NOI) Submitted	July 21, 2026
Date of Accepted Application	August 5, 2026

SOURCE DESCRIPTION

General Description
Pitman Farms (Pitman) owns and operates the Moroni Turkey Processing Plant. The plant utilizes five (5) boilers for steam generation. Two (2) natural gas-fired boilers provide the bulk of steam required for facility operations, with three (3) ancillary boilers for use during peak operation as well as during periods where one of the main boilers is down for maintenance and repair. The source also utilizes a natural gas rotary burner to cook the meat and feather meal to minimize animal waste on-site. After the meat meal and feather meal are cooked, they are further processed indoors using a mill that prepares the cooked material for further use before being stored in a baghouse-controlled silo. Two (2) emergency generators operate on-site.

NSR Classification:
Minor Modification at Minor Source

Source Classification
Located in Attainment Area
Sanpete County
Airs Source Size: B

Applicable Federal Standards
NSPS (Part 60), A: General Provisions
NSPS (Part 60), Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
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 Proposal
Modification to AO DAQE-AN159570003-26 to Install a 35.7 MMBtu/hr Boiler

Project Description
Pitman requested a modification to AO DAQE-AN159570003-26 dated April 14, 2026, to install a 35.7 MMBtu/hr boiler at the Moroni Turkey Processing Plant. The hours of operation for the new boiler will be 8,760 hours per year.

EMISSION IMPACT ANALYSIS

All criteria pollutants are below the modeling thresholds contained in R307-410-4. All HAP emissions are below their respective emission threshold values in R307-410-5. Therefore, a modeling analysis is not required at this time.

[Last updated August 5, 2026]

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	18505	49411.00
Carbon Monoxide	12.88	34.48
Nitrogen Oxides	5.71	21.15
Particulate Matter - PM_{10}	1.17	5.26
Particulate Matter - $PM_{2.5}$	1.17	3.37
Sulfur Dioxide	0.09	0.28
Volatile Organic Compounds	0.84	2.25

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Formaldehyde (CAS #50000)	30	68
Generic HAPs (CAS #GHAPS)	2	8
Hexane (CAS #110543)	552	1474
Toluene (CAS #108883)	1	17
	Change (TPY)	**Total (TPY)**
Total HAPs	0.29	0.78

Note: Change in emissions indicates the difference between previous AO and proposed modification.

Review of BACT for New/Modified Emission Units

1. **BACT review regarding Process Boiler**

The new 35.7 MMBtu/hr boiler will produce an increase in criteria and HAP emissions during operations. The option of controlling the NO_x emissions from this boiler is from the use of the installed low-NO_x burner package. Use of a low-NO_x 9 ppm burner was evaluated as potential BACT. The cost of this burner package is $793,990 over a 10-year period. Using the 9 ppm burner package results in $19,849 per ton NO_x removed in economic costs. This option is economically infeasible as BACT. Use of a 30 ppm burner package is the next control option. Using the 30 ppm burner package is economically feasible, and this is selected as BACT. [Last updated August 11, 2026]

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. **(New or Modified conditions are indicated as "New" in the Outline Label):**

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. **(New or Modified conditions are indicated as "New" in the Outline Label):**

II.A THE APPROVED EQUIPMENT

II.A.1	**Moroni Turkey Processing Plant**
II.A.2	**Boilers** One (1) Boiler (new) Rating: 35.7 MMBtu/hr Burner Control: Low-NO_x (30 ppm or less) Fuel: Natural Gas NSPS Subpart Dc One (1) Boiler Rating: 32.7 MMBtu/hr Burner Control: Low-NO_x (30 ppm or less) Fuel: Natural Gas NSPS Subpart Dc
II.A.3	**Three (3) Ancillary Boilers** Rating: 29.3 MMBtu/hr Fuel: Natural Gas NSPS Subpart Dc Rating: 15.0 MMBtu/hr Fuel: Natural Gas NSPS Subpart Dc Rating: 8.4 MMBtu/hr Fuel: Natural Gas
II.A.4	**One (1) Rotary Heater** Rating: 7 MMBtu/hr Fuel: Natural Gas Burner Control: Low-NO_x (30 ppm or less)

II.A.5	**One (1) Diesel Emergency Generator** Capacity: 325 hp Manufacture Date: 2000 MACT Subpart ZZZZ
II.A.6	**One (1) Propane Emergency Generator** Capacity: 33.5 hp Manufacture Date: 2012 NSPS Subpart JJJJ MACT Subpart ZZZZ
II.A.7	**Nine (9) Cooking Vessels** Heated with steam from boilers
II.A.8	**One (1) Feather and Meat Mill** Silo storage controlled via baghouse
II.A.9	**One (1) Diesel Storage Tank** Capacity: 500 gallons

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. **(New or Modified conditions are indicated as "New" in the Outline Label):**

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 on site to exceed 10% 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. [R307-401-8]
II.B.2	**Boiler and Heater Requirements**
II.B.2.a	The owner/operator shall only utilize natural gas as a fuel source in the boilers and heaters on site. [R307-401-8]

II.B.2.b	The owner/operator shall not exceed the following hours of operation per rolling 12-month period for each boiler: Boilers Hours of Operation 29.3 MMBtu.hr 4,000 hours 15.0 MMBtu/hr 4,000 hours 8.4 MMBtu/hr 4,000 hours. [R307-401-8]
II.B.2.b.1	To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the last day of each month using data from the previous 12 months. Records documenting monthly usage shall be kept in a log. [R307-401-8]
II.B.2.b.2	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter on all applicable boilers. [R307-401-8]
II.B.2.c NEW	The owner/operator shall not emit more than the following rates and concentrations: **35.7 MMBtu/hr Boiler** Pollutant lb/hr ppmdv NO_x 1.30 30.0 **32.7 MMBtu/hr Boiler**: Pollutant lb/hr ppmdv NO_x 1.19 30.0 Concentration (ppmdv) is corrected to 15% oxygen, dry basis. [R307-401-8]
II.B.2.c.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.c.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.c.3	**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.2.d NEW	**Stack Testing Requirements**. [R307-401-8]
II.B.2.d.1	The owner/operator shall conduct any stack testing required by this AO according to the following conditions. [R307-401-8]

II.B.2.d.2	**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.d.3	**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.d.4	**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.2.d.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.d.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.e	**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.e.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.e.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.f NEW	The owner/operator shall maintain records of the Low-NO_x burner rating certifications for all applicable boilers as listed in Section II.A for the life of the equipment. [R307-401-8]
II.B.3	**Baghouse Requirements**
II.B.3.a	The owner/operator shall use a baghouse to control particulate emissions from the feather and meat mills. [R307-401-8]

II.B.3.b	The owner/operator shall install a manometer or magnehelic pressure gauge to measure the static pressure differential across the baghouse. [R307-401-8]
II.B.3.c	At least once every 12 months, the owner/operator shall calibrate the pressure gauge in accordance with the manufacturer's instructions or replace the pressure gauge. [R307-401-8]
II.B.3.c.1	The owner/operator shall maintain records of the pressure gauge calibrations and replacements. [R307-401-8]
II.B.3.c.2	The pressure gauge shall be located such that an inspector/operator can safely read the indicator at any time. [R307-401-8]
II.B.3.c.3	The pressure gauge shall measure the static pressure differential in 1-inch water column increments or less. [R307-401-8]
II.B.3.d	During operation of the baghouse, the owner/operator shall maintain the static pressure differential across the baghouse between 2.0 and 6.0 inches of water column. [R307-401-8]
II.B.3.d.1	The owner/operator shall record the static pressure differential at least once per operating day while the baghouse is operating. [R307-401-8]
II.B.3.d.2	The owner/operator shall maintain the following records of the static pressure differential: A. Unit identification; B. Daily static pressure differential readings; C. Date of reading. [R307-401-8]
II.B.4	**Haul Road and Fugitive Dust Requirements**
II.B.4.a	The owner/operator shall not allow visible emissions from the haul roads and other operational areas to exceed 20% opacity. [R307-401-8]
II.B.4.a.1	Visible emission determinations for fugitive dust emissions from haul-road traffic and mobile equipment in operational areas shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six-minute period, however, shall not apply. Visible emissions shall be measured at the densest point of the plume but at a point not less than 1/2 vehicle length behind the vehicle and not less than 1/2 the height of the vehicle. [R307-401-8]
II.B.4.b	For unpaved roads, the owner/operator shall spray with water all applicable haul roads and operational areas on site to maintain the opacity limits listed in this AO. If the temperature is below freezing, the owner/operator may stop spraying the haul roads with water. [R307-401-8]

II.B.4.b.1	The owner/operator shall keep records for all periods when the plant is in operation. The records shall include the following items: A. Date and time treatments were made B. Number of treatments made and quantity of water applied C. Rainfall amount received, if any D. Records of temperature, if the temperature is below freezing. [R307-401-8]
II.B.5	**Emergency Generator Requirements**
II.B.5.a	The owner/operator shall not operate the emergency generator 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 engine during emergencies. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.5.a.1	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for the emergency engine. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.5.a.2	To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the last day of each month using data from the previous 12 months. Records documenting the operation of the 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.6	**Fuel Requirements**
II.B.6.a	The owner/operator shall only use diesel fuel (fuel oil #1, #2, or diesel fuel oil additives) as a fuel source for the 325 hp emergency engine on site. All diesel burned shall meet the definition of ultra-low sulfur diesel (ULSD), and contain no more than 15 ppm sulfur. [R307-401-8]
II.B.6.a.1	To demonstrate compliance with the ULSD requirements for any diesel fuel purchased, 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. [R307-401-8]
II.B.6.b	The owner/operator shall only use LPG as a fuel source for the 33.5 hp emergency generator engine on site. [R307-401-8]

PERMIT HISTORY

When issued, the approval order shall supersede (if a modification) or will be based on the following documents:

Supersedes	AO DAQE-AN159570003-26 dated April 14, 2026
Is Derived From	NOI dated July 22, 2026
Incorporates	Additional information dated August 11, 2026

REVIEWER COMMENTS

1. **Comment regarding Emissions Estimates:**
Criteria and HAP emissions, except for NO_x, were calculated for the 35.7 MMBtu/hr boiler at 8,760 hours of operation per year using AP-42 Section 1.4, Tables 1.4-1 through 1.4-4.
NO_x emissions were estimated with an emission factor of 1.30 lb/hr.
CO_2e emissions were estimated using global warming potentials from Table A-1 to Subpart A of Part 98.
[Last updated August 5, 2026]

2. **Comment regarding NSPS & MACT Applicability:**
40 CFR 60 NSPS Subpart Dc applies to owners and operators of boilers with ratings above 10.0 MMBtu/hr. Since this source will have boilers that are rated larger than 10.0 MMBtu/hr, NSPS Subpart Dc will apply to this facility.

40 CFR 60 Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (ICE) applies to engines manufactured after 2007. The on-site engine was manufactured and installed in 2001. Therefore, NSPS Subpart IIII does not apply to this facility.

40 CFR 60 Subpart JJJJ applies to owners and operators of the ICE that commence construction or are reconstructed after June 12, 2006. Both engines at the facility commenced construction after the 2006 date. NSPS Subpart JJJJ will apply to this plant.

40 CFR 63 Subpart ZZZZ applies to owners and operators of stationary RICE at a major or area source of HAP emissions. Since this source operates a stationary RICE and is an area source of HAP emissions, MACT Subpart ZZZZ applies to both engines at this facility.
40 CFR 63 Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources applies to dual fuel type boilers manufactured after June 4, 2010. The 32.7 MMBtu/hr boiler uses natural gas exclusively; therefore, this subpart does not apply to this plant.
[Last updated August 11, 2026]

3. **Comment regarding Title V Applicability:**
Title V of the 1990 Clean Air Act (Title V) applies to the following:

1. Any major source

2. Any source subject to a standard, limitation, or other requirement under Section 111 of the Act, Standards of Performance for New Stationary Sources;

3. Any source subject to a standard or other requirement under Section 112 of the Act, Hazardous

Air Pollutants.

4. Any Title IV affected source.

This facility is not a major source and is not a Title IV source; however, the facility is subject to 40 CFR 60 Subparts A, Dc, IIII, and JJJJ and 40 CFR 63 MACT Subparts A, ZZZZ regulations. However, Title V does not apply because NSPS Dc, IIII, and JJJJ and MACT Subparts ZZZZ exempt sources from the obligation to obtain a permit under 40 CFR part 70 (Title V permit) if the source is not otherwise required by law to obtain a permit. There are no other reasons why this source would be required to obtain a part 70 permit; therefore, Title V does not apply to this facility.

[Last updated August 11, 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 EPA 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 - 40 CFR 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 UDAQ use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - 40 CFR 52.21 (b)(49)(i)
GWP	Global Warming Potential - 40 CFR Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/HR	Pounds per hour
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

RMEC Environmental, Inc.
476 West 325 South
Bountiful, UT 84010

info@rmec.net
office: 801.467.3661
rmec.net

RMEC PP21E-4223

July 20, 2026

Bryce Bird
Director
Utah Division of Air Quality
195 North 1950 West
P.O. Box 144820
Salt Lake City, Utah 84114-4820

SUBJECT: REQUEST FOR MODIFICATION OF APPROVAL ORDER

Re: Pitman Farms – Moroni Turkey Processing Plant (MTPP)
UDAQ Approval Order: DAQE-AN159570003-26
15 East 1900 South Feed Mill Road
Moroni, UT 84646

Dear Mr. Bird:

On behalf of Pitman Farms, RMEC Environmental, Inc. (RMEC) is hereby providing the Utah Division of Air Quality (UDAQ) with the following modification request regarding the above-referenced Approval Order (AO). This modification is for the inclusion of the operation of a previously out-of-service boiler, which will result in an increase in combustion emissions at the site.

MODIFICATION DETAILS

Approved boiler equipment under the current AO for the site includes one (1) 32.7 MMBtu Low-NO_x boiler, and three (3) ancillary boilers. Pitman Farms is requesting to add an Indeck 35.7 MMBtu boiler to the permit. This equipment had been utilized previously and was taken out of service in 2025. Pitman Farms intends to use this boiler as an additional primary boiler along with the 32.7 MMBtu boiler, which is currently permitted for use on an unrestricted basis (24 hours per day, 7 days per week) under section II.A.2 of the site's current AO. Pitman Farms would like to continue to utilize the three (3) ancillary boilers on a supplemental basis (4,000 hours per year) as permitted in section II.B.2.b of the current AO.

The Indeck 35.7 MMBtu boiler will be utilized up to 8,760 hours per year. The NO_x burner controls for this equipment are 30-ppm, which are considered Low-NO_x. The calculations for the emissions from this boiler are provided as **Exhibit A**. A summary of the emissions from the operation of this boiler are summarized in the table below in addition to the current AO limits and the new requested permit limits.

SUMMARY OF EMISSION LIMIT MODIFICATIONS

Table 1, below, provides a summary of the total emission adjustments for the MTPP facility based on the current permit limits and the proposed modifications:

Table 1: Current and Proposed Criteria & HAP Pollutant Emission Levels

HOURS OF OPERATION	Criteria Pollutant Emissions (tpy)								Individual HAPs (lbs/yr)			
	CO	NOx	SO_2	VOCs	PM_{10}	$PM_{2.5}$	HAPs	CO_2e	Formaldehyde	Generic HAPs	Hexane	Toluene
Proposed Net Emission Increase	12.88	5.71	0.09	0.84	1.17	1.17	0.29	18,505	30	2	552	1
Current Permitted Emission Levels	21.60	15.44	0.19	1.41	4.09	2.20	0.49	30,906	38	6	992	16
New Requested Permit Level	**34.48**	**21.15**	**0.28**	**2.25**	**5.26**	**3.37**	**0.78**	**49,411**	**68**	**8**	**1,474**	**17**

NO_X BACT ANALYSIS

Technological Feasibility

Based on information provided by Servco, the 9-pppm Ultra-low NO_x Burners (ULNBs) are the BACT for this boiler. A summary of the NO_x emissions from the operation of this boiler with a 9-ppm ULNB for 8,760 hours per year is provided as **Exhibit B.** As indicated in this exhibit, the total NO_x emissions from operation of the boiler with 9-ppm ULNBs would be 1.71 tons per year, yielding a 4 ton-per-year reduction from the 30-ppm low NO_x burners.

Economic Analysis for Conversion to UNLBs

Based on a quotation provided by Servco, the cost for a conversion to the 9-ppm ULNB would be an additional $793,990 (see **Exhibit C**). Based on a 10-year amortization period, the cost for the 9-ppm ULNB option would amount to the annualized cost of more than $19,849 per ton [($793,990 / 4 tons) / 10 years]. Please note that this does not account for interest and increased annual operation and maintenance costs. The overall cost of this control option is not considered to be economically feasible.

CLOSING

Thank you for your attention to this request. If you have any questions or need additional information, please contact me at 801.467.3661 or by email at *dhancock@rmec.net*.

Sincerely,

Daryl Hancock

Daryl Hancock, CHMM, CEM
Principal Scientist
RMEC ENVIRONMENTAL, INC.

Attachments:

Exhibits

Exhibit A: Emission Calculations for the Indeck 35.7 MMBtu Boiler with Low-NO_X Burners

Exhibit B: Emission Calculations for the Indeck 35.7 MMBtu Boiler with ULNBs

Exhibit C: Servco Quotation for Installation of ULNBs

Cc: Luke Freeman, Pitman Farms (electronic copy)

Exhibit A: Emission Calculations for the Indeck 35.7 MMBtu Boiler with Low-NO_X Burners

Natural Gas-Fired Boilers & Heaters

Equipment Details		
Rating	36	MMBtu/hour
Operational Hours	8,760	hours/year
Firing	Normal	

Criteria Pollutant	Concentration (ppm)	Emission Factor (lb/10^6 scf)	Emission Rate (lbs/hr)	Emission Total (tons/year)	Reference
NO_X	30		1.30	5.71	Manufacturer Data
CO		84	2.94	12.88	or AP-42 Table 1.4-1
PM_{10}		7.6	0.27	1.17	
$PM_{2.5}$		7.6	0.27	1.17	
SO_2		0.6	0.02	0.09	AP-42 Table 1.4-2
VOC		5.5	0.19	0.84	
Lead		0.0005	0.00	0.00	
HAP			0.07	0.29	See Below

Green House Gas Pollutant	Global Warming Potential	Emission Factor (lb/10^6 scf)	Emission Rate (lbs/hr)	Emission Total (tons/year)	Reference
CO_2 (mass basis)	1	120,000	4,200	18,396	AP-42 Table 1.4-2
Methane (mass basis)	25	2.3	0.08	0.35	&
N_2O (mass basis)	298	2.2	0.08	0.34	Table A-1 to
CO_2e				18,505	Subpart A of Part 98

Hazardous Air Pollutant	Emission Factor (lb/10^6 scf)	Emission Rate (lbs/hr)	Emission Total (tons/year)	Reference
2-Methylnaphthalene	2.40E-05	8.40E-07	3.68E-06	
3-Methylchloranthrene	1.80E-06	6.30E-08	2.76E-07	
7,12-Dimethylbenz(a)anthracene	1.60E-05	5.60E-07	2.45E-06	
Acenaphthene	1.80E-06	6.30E-08	2.76E-07	
Acenaphthylene	1.80E-06	6.30E-08	2.76E-07	
Anthracene	2.40E-06	8.40E-08	3.68E-07	
Benz(a)anthracene	1.80E-06	6.30E-08	2.76E-07	
Benzene	2.10E-03	7.35E-05	3.22E-04	
Benzo(a)pyrene	1.20E-06	4.20E-08	1.84E-07	
Benzo(b)fluoranthene	1.80E-06	6.30E-08	2.76E-07	
Benzo(g,h,i)perylene	1.20E-06	4.20E-08	1.84E-07	
Benzo(k)fluoranthene	1.80E-06	6.30E-08	2.76E-07	AP-42 Table 1.4-3
Chrysene	1.80E-06	6.30E-08	2.76E-07	
Dibenzo(a,h)anthracene	1.20E-06	4.20E-08	1.84E-07	
Dichlorobenzene	1.20E-03	4.20E-05	1.84E-04	
Fluoranthene	3.00E-06	1.05E-07	4.60E-07	
Fluorene	2.80E-06	9.80E-08	4.29E-07	
Formaldehyde	7.50E-02	2.63E-03	1.15E-02	
Hexane	1.80E+00	6.30E-02	2.76E-01	
Indeno(1,2,3-cd)pyrene	1.80E-06	6.30E-08	2.76E-07	
Naphthalene	6.10E-04	2.14E-05	9.35E-05	
Phenanathrene	1.70E-05	5.95E-07	2.61E-06	
Pyrene	5.00E-06	1.75E-07	7.67E-07	
Toluene	3.40E-03	1.19E-04	5.21E-04	
Arsenic	2.00E-04	7.00E-06	3.07E-05	
Beryllium	1.20E-05	4.20E-07	1.84E-06	
Cadmium	1.10E-03	3.85E-05	1.69E-04	
Chromium	1.40E-03	4.90E-05	2.15E-04	
Cobalt	8.40E-05	2.94E-06	1.29E-05	AP-42 Table 1.4-4
Manganese	3.80E-04	1.33E-05	5.83E-05	
Mercury	2.60E-04	9.10E-06	3.99E-05	
Nickel	2.10E-03	7.35E-05	3.22E-04	
Selenium	2.40E-05	8.40E-07	3.68E-06	

Exhibit B: Emission Calculations for the Indeck 35.7 MMBtu Boiler with ULNBs

Natural Gas-Fired Boilers & Heaters

Equipment Details		
Rating	36	MMBtu/hour
Operational Hours	8,760	hours/year
Firing	Normal	

Criteria Pollutant	Concentration (ppm)	Emission Factor (lb/10^6 scf)	Emission Rate (lbs/hr)	Emission Total (tons/year)	Reference
NO_X	9		0.39	1.71	Manufacturer Data or AP-42 Table 1.4-1
CO		84	2.94	12.88	
PM_{10}		7.6	0.27	1.17	AP-42 Table 1.4-2
$PM_{2.5}$		7.6	0.27	1.17	
SO_2		0.6	0.02	0.09	
VOC		5.5	0.19	0.84	
Lead		0.0005	0.00	0.00	
HAP			0.07	0.29	See Below

Green House Gas Pollutant	Global Warming Potential	Emission Factor (lb/10^6 scf)	Emission Rate (lbs/hr)	Emission Total (tons/year)	Reference
CO_2 (mass basis)	1	120,000	4,200	18,396	AP-42 Table 1.4-2 & Table A-1 to Subpart A of Part 98
Methane (mass basis)	25	2.3	0.08	0.35	
N_2O (mass basis)	298	2.2	0.08	0.34	
CO_2e				18,505	

Hazardous Air Pollutant	Emission Factor (lb/10^6 scf)	Emission Rate (lbs/hr)	Emission Total (tons/year)	Reference
2-Methylnaphthalene	2.40E-05	8.40E-07	3.68E-06	AP-42 Table 1.4-3
3-Methylchloranthrene	1.80E-06	6.30E-08	2.76E-07	
7,12-Dimethylbenz(a)anthracene	1.60E-05	5.60E-07	2.45E-06	
Acenaphthene	1.80E-06	6.30E-08	2.76E-07	
Acenaphthylene	1.80E-06	6.30E-08	2.76E-07	
Anthracene	2.40E-06	8.40E-08	3.68E-07	
Benz(a)anthracene	1.80E-06	6.30E-08	2.76E-07	
Benzene	2.10E-03	7.35E-05	3.22E-04	
Benzo(a)pyrene	1.20E-06	4.20E-08	1.84E-07	
Benzo(b)fluoranthene	1.80E-06	6.30E-08	2.76E-07	
Benzo(g,h,i)perylene	1.20E-06	4.20E-08	1.84E-07	
Benzo(k)fluoranthene	1.80E-06	6.30E-08	2.76E-07	
Chrysene	1.80E-06	6.30E-08	2.76E-07	
Dibenzo(a,h)anthracene	1.20E-06	4.20E-08	1.84E-07	
Dichlorobenzene	1.20E-03	4.20E-05	1.84E-04	
Fluoranthene	3.00E-06	1.05E-07	4.60E-07	
Fluorene	2.80E-06	9.80E-08	4.29E-07	
Formaldehyde	7.50E-02	2.63E-03	1.15E-02	
Hexane	1.80E+00	6.30E-02	2.76E-01	
Indeno(1,2,3-cd)pyrene	1.80E-06	6.30E-08	2.76E-07	
Naphthalene	6.10E-04	2.14E-05	9.35E-05	
Phenanathrene	1.70E-05	5.95E-07	2.61E-06	
Pyrene	5.00E-06	1.75E-07	7.67E-07	
Toluene	3.40E-03	1.19E-04	5.21E-04	
Arsenic	2.00E-04	7.00E-06	3.07E-05	AP-42 Table 1.4-4
Beryllium	1.20E-05	4.20E-07	1.84E-06	
Cadmium	1.10E-03	3.85E-05	1.69E-04	
Chromium	1.40E-03	4.90E-05	2.15E-04	
Cobalt	8.40E-05	2.94E-06	1.29E-05	
Manganese	3.80E-04	1.33E-05	5.83E-05	
Mercury	2.60E-04	9.10E-06	3.99E-05	
Nickel	2.10E-03	7.35E-05	3.22E-04	
Selenium	2.40E-05	8.40E-07	3.68E-06	

Exhibit C: Servco Quotation for Installation of ULNBs

Proposal

Holbrook Servco L.P.
1580 S Pioneer Rd
Salt Lake City, UT 84104
(801) 486-4300

Date:	**06/10/2026**
Quote No:	**9304**
Exp Date:	**07/10/2026**
Sales Rep:	**Burgess, Brad**
Mobile:	
Phone:	
Email:	**payablesnb@pitmanfarms.com**

Bill To Address	Site Address
Pitman Farms 350 South 300 West Moroni, UT 84646	**Pitman Farms - Norbest** 160 South 550 West Salina, UT 84654

INDECK - 9PPM BURNER CONVERSION

Description	Qty	Price ($)	Amount ($)
Scope of Work – Burner Replacement and Low-NOx Conversion on (1) Indeck boiler Servco will provide labor, materials, and equipment required to remove the existing burner and install a new burner package capable of firing natural gas at 9 ppm NOx. The boiler will be shut down, isolated, locked out, and prepared for safe removal of the existing burner. The existing burner, associated burner components, and related controls will be disconnected and removed as required to allow installation of the new burner package. The front wall refractory will be modified as required to accept the new burner. New front wall steel will be furnished and installed as needed to properly support the new burner installation. New burner throat refractory will be installed, cured, and prepared for startup. The new burner will be rigged into place and installed on the boiler. Servco will fabricate and install a new burner support stand as required to properly support the burner assembly. A new gas train will be installed to provide the required gas flow and pressure for the new burner. Gas train installation will include the necessary valves, controls, regulators, switches, and trim required for the burner package. All required steam trim associated with the burner installation will also be installed. New burner controls will be provided and installed, including the **Cleaver-Brooks Hawk 4500 control system**. New high-voltage and control cabinets will be installed as part of the burner control package. From the existing disconnect forward, new conduit and wiring will be installed to the burner, control cabinets, gas train components, safeties, actuators, and associated field devices. A new variable speed drive will be mounted and wired for combustion air blower fan control. The VSD will be integrated into the burner control system and commissioned as part of the burner startup. The stack will be modified to add a flue gas recirculation connection. New double-wall stainless steel FGR piping will be furnished, installed, and supported from the stack to the burner. FGR piping will be installed to support proper burner operation and low-NOx performance. New water level controls will be installed and tied into the burner control system. Controls and safeties will be wired and tested as part of the burner commissioning process. An O2 trim system will be installed in the stack and wired back to the burner controls. The O2 trim system will be integrated with the Hawk 4500 control system and commissioned during burner startup. Upon completion of installation, the burner will be started, tested, tuned, and	1.00	280613.33	280613.33

Description	Qty	Price ($)	Amount ($)
commissioned. Combustion setup will be performed for proper burner operation, safety operation, modulation, FGR operation, VSD control, O2 trim operation, and low-NOx performance. Included Work * Shutdown, isolation, and lockout of the boiler for burner replacement. * Removal of existing burner and associated components. * Modification of front wall refractory to accept new burner. * Installation of new front wall steel as required. * Rigging and installation of new burner. * Fabrication and installation of new burner support stand. * Installation of new burner throat refractory. * Curing of new burner refractory. * Installation of new gas train sized for required burner gas flow and pressure. * Installation of required steam trim. * Installation of new Hawk 4500 burner control system. * Installation of new high-voltage and control cabinets. * Installation of new conduit and wiring from the existing disconnect forward. * Wiring of burner controls, safeties, actuators, gas train components, and field devices. * Installation and wiring of VSD for combustion air blower control. * Stack modification for FGR connection. * Installation and support of new double-wall stainless steel FGR piping from stack to burner. * Installation of new water level control			
Burner Configuration Data Sheet Equipment Summary: Manufacturer Cleaver-Brooks Burner Series ProFire NTXL Burner Model NTXLG-546 Application: Retrofit burner for Indeck W-1578 watertube boiler Fuel: Natural Gas Maximum Firing Rate: 49,728 MBH Emissions Rating :9 ppm NOx on natural gas Boiler Type: Industrial Watertube Boiler Capacity: 41,000 lbs/hr steam Operating Pressure: 120 PSIG high-pressure steam Installation Location: Indoor boiler room Elevation: 4,000 ft. above sea level Furnace Pressure: 0.8" w.c. calculated Line Voltage 460/3/60 Control Voltage 115/1/60 Blower Motor 125 HP Operation Full modulation Purge Method Open damper pre-purge Modulation Control Multiple actuator parallel positioning	1.00	451512.00	451512.00
Freight/shipping is NOT included. Carrier charges will be billed at cost and added to the final invoice at the time of billing.	1.00	0.00	0.00

Sub Total	**$732,125.33**
Tax (8.4500 %)	$61864.59
Total	**$793,989.92**

Message

Please confirm your acceptance of this Quote with your signature.

Signature : Name: Date :

Purchase order number for approved work: _____ Unless otherwise indicated within the written quote provided, this quotation is only valid for thirty (30) days. Freight is NOT included in the price of your parts/materials. Unless it is included as a freight line item in the quote, freight will be added to the final invoice. TERMS AND CONDITIONS The following sets forth the sale and payment terms and conditions of Holbrook Servco, LP. (Collectively, the “Company” or “we”). It constitutes the general agreement between the Company and you, its customer, under which products, services, and parts are sold, credit is extended, and payments are expected. This policy supersedes all previous sales and credit,

payment terms and conditions, and finance policies issued by the Company and shall remain in effect until further notice. The Company reserves the right to change this policy and agreement at any time. STANDARD WORKMANSHIP WARRANTY Holbrook Servco, LP warrants that the workmanship and installation performed by Holbrook Servco (Collectively, “workmanship”) shall conform in all respects to the specifications and quality contained in such proposal and such other specifications as may be otherwise expressly agreed to in writing by Holbrook Servco (“Warranty”). Holbrook Servco, at its option and in its sole and absolute discretion, may also grant additional or extended warranties with respect to the Workmanship or any aspect thereof (collectively, “Extended Warranty”), which if granted, shall be incorporated into, and made part of the Warranty. In the event of a conflict between the Warranty and any Extended Warranty, the terms of the Extended Warranty shall control. Warranty is valid for thirty (30) days after completion of the work performed. IN-WARRANTY MATERIALS Holbrook Servco will rely solely on the warranty provided by the manufacturer for all parts and materials. The sole and exclusive remedy for breach of warranty shall be as provided in the manufacturer’s standard warranty unless otherwise specifically expressed in writing. You will be invoiced in a regular manner for all materials and parts even though it may be an in-warranty transaction. Credit will be issued promptly upon receipt of proof of return, and, if the return is within the prescribed time limit and has been properly authorized. Please note that withholding payment of any invoice in anticipation of an in-warranty credit is not permissible under our terms of sale. INVOICING AND PAYMENT TERMS PAYMENT TERMS Upon approval of credit, all orders from you for products, parts, or services will be invoiced upon completion of services rendered or delivery of parts. Standard Payment Terms are NET 30 days (upon approval of credit) on all invoices unless other arrangements are negotiated and agreed upon. These terms are stated on your invoice. When opening a new account with an order, we may require payment with the initial order so as not to delay shipments while credit references and financial information are being reviewed. We reserve the right to suspend or terminate any further performance under this agreement or otherwise in the event payment is not made when due. INVOICING TERMS (SCHEDULE OF VALUES) Standard billing terms (schedule of values) apply to amounts up to $24,999.00. For these amounts, 100% of the invoice amount will be sent upon completion or shipment and the standard NET 30 Terms will apply. For amounts between $25,000.00 - $100,000.00 (USD), we will require the following progress payments in lieu of the standard payment terms (schedule of values): • 50% Due with Purchase Order - Due Upon Receipt • 50% Due upon Completion - NET 30 For amounts that Exceed $100,000.00 (USD), we will require the following progress payments in lieu of the standard payment terms (schedule of values): • 25% Due with Purchase Order - Due Upon Receipt • 30% Due upon Equipment Delivery (to jobsite or to yard to stage for work, with inspection) - NET 30 • 20% Due upon Commencement of work onsite – NET 30 • 20% Due upon Substantial Completion – NET 30 • 5% Due upon Final Acceptance (completion of punch list items) – NET 30 If Retainage is required as part of the agreement, this will be added as a deduct on each invoice and then a final retainage billing will be sent upon final completion. For Equipment Only Purchases with amounts that Exceed $100,000.00 (USD), we will require the following progress payments in lieu of the standard payment terms (schedule of values): • 30% Due upon Submittal Release to Production – NET 30 • 50% Due upon Equipment Shipment - NET 30 • 20% Due upon Delivery & Site Inspection (to jobsite or to yard to stage for work) – NET 30. Tariff Adjustments: If any new tariffs, duties, or similar government-imposed charges or increases to existing tariffs, existing duties or similar existing government-imposed charges, affect the products or services outlined in this proposal prior to equipment shipment or the completion of the services, those costs will be added as a surcharge.

Department *of* Environmental Quality
Division *of* Air Quality

Form 2

Company Information/Notice of Intent (NOI) New Source Review

Date 8/11/2026

Application for: ☐ **Initial Approval Order** ☑ **Approval Order Modification**

General Owner and Source Information

Company name and mailing address:	Company contact for environmental matters*:
Pitman Farms 1075 North Ave Sanger, CA 93657 Phone No.: (559) 875-9300	Luke Freeman Phone no.: (435) 314-9862 Email: lfreeman@pitmanfarms.com ** Company contact only; consultant/ independent contractor information can be provided in a cover letter*
Site name and physical address:	Property Universal Transverse Mercator Coordinates (UTM): *including System and Datum*:
Pitman Farms, Moroni Turkey Processing 350 South 300 West Moroni, UT 84646 Phone no.: (435) 436-8211	UTM: Zone 12 X: 449,278 m Easting Y: 4,374,457 m Northing
County Sanpete	Standard Industrial Classification Code (SIC) 2015

FOR MODIFICATION ONLY: DAQE # AN159570003-26 Date: April 14, 2026

Brief (50 words or less) description of process.

The Moroni Turkey Processing Plant utilizes boilers for steam generation to process turkeys for consumption. It is proposed that the plant have two (2) primary boilers for use during processing, with three (3) ancillary boilers for times of increased demand or when a primary boiler is down.

A complete and accurate electronic NOI submitted can expedite review process. Please mark application type.

Electronic Copy ☑ Hard Copy ☐ Both ☐

AlanHumpherys (ahumpherys@utah.gov) Minor NSR Manager Jon Black (jlblack@utah.gov) Major NSR Manager

Authorization/Signature

I hereby certify that the information and data submitted in and with this application is completely true, accurate and complete, based on reasonable inquiry made by me and to the best of my knowledge and belief.

Signature: Luke Freeman (Digitally signed by Luke Freeman Date: 2026.08.11 11:42:22 -06'00')	Title: Technical Services Director
Name (Type or print) Luke Freeman	Phone No. (435) 314-9862
Date: 8/11/2026	Email: lfreeman@pitmanfarms.com

Note: The Division of Air Quality will not accept documents containing confidential information or data. Documents containing confidential information will be returned to the Source submitting the application.