



November 7, 2025

VIA EMAIL (tjoseph@pa.gov)

Mr. Thomas Joseph, Environmental Engineering Manager
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222

Re: Draft Title V Operating Permit # 26-00590 (the “Draft Permit”)
Carlisle Construction Materials, LLC (the “Facility”)

Dear Mr. Joseph:

I have attached comments regarding the above-referenced draft Title V Operating Permit that I am submitting on behalf of the Group Against Smog and Pollution. According to the October 11, 2025, edition of the Pennsylvania Bulletin, the Department is accepting comments on the Draft Permit for thirty days, or through November 10, 2025. Thanks in advance for your attention to these comments.

Sincerely,

/s

John K. Baillie
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING THE DRAFT TITLE V OPERATION PERMIT FOR
CARLISLE CONSTRUCTION MATERIALS, LLC'S HUNTER PANEL PLANT
(TITLE V PERMIT NO. 26-00590)**

I. THE PERMIT MUST INCLUDE ALL APPLICABLE OPERATIONAL AND MONITORING REQUIREMENTS RELATING TO THE FOAM PANEL SAWING OPERATIONS

A Title V Operating Permit must include “[e]missions limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance.”¹

A. The Permit Must Require PM Emissions from the Foam Panel Sawing Operations be Captured and Controlled by a Baghouse

The Permit establishes a continuous emission limit for particulate matter (“PM”), which is expressed in terms of grains per dry standard cubic foot (“gr/dscf”).² The Facility’s application for its Title V Operating Permit states that “PM emissions from the foam panel sawing operations are captured and controlled by a baghouse.”³ It appears from the application and the Department’s Review Memo that the Facility must use the baghouse to capture and control such emissions if it is to achieve the Permit’s limit on PM emitted by the Foam Panel Sawing Operations.

Thus, the operational requirement that PM emissions from the Foam Panel Sawing Operations be captured and controlled by a baghouse is a requirement that assures compliance with the Permit’s limit on PM emissions from those operations. As such, that requirement must

¹ 40 C.F.R. § 70.6(a)(1); *see also* 25 Pa. Code § 127.512(h) (“The permit shall contain emission limits and standards, including those operational requirements and limitations that assure compliance with the applicable requirements at the time of permit issuance”).

² Permit, Part D, Source ID 120, § I #001, at 32.

³ POWER ENGINEERS, Carlisle Constr. Materials, LLC, Hunter Panel Plant, *Title V Operating Permit Application*, at 13 (Nov. 2024) (the “Application”).

be included in the Permit. However, the Permit does not expressly require that emissions from the Foam Panel Sawing Operations be captured and controlled by the associated baghouse. Accordingly, the Permit must be revised to include a requirement that PM emissions from those operations be captured and controlled by a baghouse.

B. The Permit Must Establish a Range Within Which Pressure Drop Across the Baghouse Must be Maintained

The Permit establishes a continuous limit on emissions of particulate matter (“PM”) from the Facility’s Foam Panel Sawing Operations,⁴ requires that a performance test of the baghouse associated with those operations be conducted upon issuance of the Permit and once every five years thereafter,⁵ and also requires that the pressure drop across that baghouse be monitored and recorded.⁶

The Permit does not, however, specify a range within which the Facility is required to maintain pressure drop across the baghouse, even though the Application states that “[t]he baghouse is equipped with a continuous electronic pressure sensor that measures the pressure differential across the filters for each baghouse compartment” and that “[t]he differential pressure is maintained between 0 - 10 inches of water when a compartment is not in the cleaning cycle.”⁷

In the absence of any limitation or restriction on the pressure drop across the baghouse, it is not clear how the Permit assures compliance with its continuous limit on PM emissions from the Facility’s Foam Panel Sawing Operations. The performance test that the Permit requires

⁴ Permit, Part D, Source ID 120, § I #001, at 32.

⁵ *Id.*, § II. #002, at 32.

⁶ *Id.*, § III. #003, at 32.

⁷ Application, at 3.

once every five years is not sufficient to assure compliance with the Permit's continuous emission limit on PM emissions from the Foam Panel Sawing Operations.⁸ Further, the Permit's requirement that the pressure drop across the baghouse be monitored continuously and recorded does not by itself assure compliance with that PM emission limit. Rather, to assure compliance with the continuous limit on PM emissions from the Facility's Foam Panel Sawing Operations, the Permit must require that emissions from those operations are captured and controlled by the baghouse and that the pressure drop across the baghouse is maintained at the range necessary to assure compliance with the Permit's limit on PM emissions from those operations.⁹

II. THE PERMIT MUST SPECIFY A MINIMUM TEMPERATURE FOR THE FACILITY'S REGENERATIVE THERMAL OXIDIZER

A Title V Operating Permit must include “[e]missions limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance.”¹⁰

The Permit requires that the Facility uses a Regenerative Thermal Oxidizer to control emissions of volatile organic compounds (“VOCs”) from the Facility's Lamination Line and

⁸ United States Env'tl. Prot. Agency, Order Granting a Petition for Objection to a Title V Operating Permit, *In the Matter of United States Steel Corp. Edgar Thomson Plant*, at 11-17 (Feb. 7, 2024)(granting a petition to object to a Title V Operating Permit because the permit record did not demonstrate that performance tests that were to be run every two, four, or five years were not by themselves sufficient to assure compliance with hourly and rolling 12-month emission limits), *available at*: https://www.epa.gov/system/files/documents/2024-02/us-steel-edgar-thomson-order_02-07-2024.pdf.

⁹ United States Env'tl. Prot. Agency, Order Granting Petition for Objection to Permit, *In the Matter of Wis. Pub. Serv. Corp.'s J.P. Pulliam Power Plant*, at 12 (June 28, 2010) (granting a petition to object to a Title V Operating Permit in part because “neither the permit nor the permit record identify the specific indicator range(s) that would assure the proper functioning of the baghouse to assure compliance with the PM limits,” although the Permit required some monitoring of pressure drop across the baghouse), *available at*: https://www.epa.gov/sites/production/files/2015-08/documents/jp_pulliam_decision2009.pdf.

¹⁰ 40 C.F.R. § 70.6(a)(1); *see also* 25 Pa. Code § 127.512(h) (“The permit shall contain emission limits and standards, including those operational requirements and limitations that assure compliance with the applicable requirements at the time of permit issuance”).

Pour Table and Foam Panel Sawing Operations, and also requires that the oxidizer reduce such emissions by a minimum of 98%.¹¹ The Permit further requires that the destructive efficiency of the Regenerative Thermal Oxidizer be tested at 1,450 degrees Fahrenheit,¹² and that the temperature of the Regenerative Thermal Oxidizer's combustion chamber be monitored continuously.¹³ However, the Permit does not specify a minimum operating temperature for the Regenerative Thermal Oxidizer.

The destructive efficiency of a regenerative thermal oxidizer depends in large part on combustion occurring at a required minimum temperature.¹⁴ Although the Permit requires that the destructive efficiency of the Facility's Regenerative Thermal Oxidizer be tested at 1,450 degrees Fahrenheit, the Permit does not expressly require that the Facility's Regenerative Thermal Oxidizer be operated either at that temperature or some other temperature established by testing that assures compliance with the Permit's requirement that the oxidizer reduce VOC emissions by at least 98%.

In the absence of a minimum temperature requirement for the Facility's Regenerative Thermal Oxidizer, it is not clear how the Permit assures compliance with its requirement that the oxidizer reduce VOC emissions from the Lamination Line and Pour Table and Foam Panel Sawing Operations by at least 98%. The Permit must include a minimum temperature requirement for the Regenerative Thermal Oxidizer that assures compliance with the Permit's

¹¹ Permit, Part E, Group G01, § I #001, at 46.

¹² *Id.*, § II. #002.

¹³ *Id.*, § III. #003.

¹⁴ See United States Env'tl. Prot. Agency, *Air Pollution Control Technology Fact Sheet*, EPA-452/F-03-022, available at: <https://web.archive.org/web/20150410211357/http://www.epa.gov/ttnchie1/mkb/documents/fthermal.pdf>.

requirement that the oxidizer reduce VOC emissions from the Lamination Line and Pour Table and Foam Panel Sawing Operations by at least 98%