



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 9, 2006

Certified Mail No. 7005 1160 0000 1550 4229

David Durkin, Vice President
LJD Holdings, Inc., dba B&D Foods
P.O. Box 16450
Boise, Idaho 83705

RE: Facility ID No. 001-00162, LJD Holdings, Inc., dba B&D Foods, Boise
Final Permit Letter

Dear Mr. Durkin:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050006 for LJD Holdings, Inc., dba B&D Foods in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on March 11, 2005. This permit is effective immediately. This permit does not release LJD Holdings, Inc., dba B&D Foods from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/REB/bf

Permit No. P-050006

Enclosures

c: **June Hues, Boise Regional Office**
 Bill Rogers, Permit Coordinator
 Robert Baldwin, Permit Writer
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Laurie Kral, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050006

FACILITY ID No.: 001-00162

AQCR: 64

CLASS: B

SIC: 2013

ZONE: 11

UTM COORDINATE (km): 565.2, 4824.6

1. PERMITTEE

LJD Holdings, Inc., dba B and D Foods

2. PROJECT

Initial Permit to Construct

3. MAILING ADDRESS

P.O. Box 16450

CITY

Boise

STATE

ID

ZIP

83715-6450

4. FACILITY CONTACT

David Durkin

TITLE

Vice President

TELEPHONE

(208) 344-1291

5. RESPONSIBLE OFFICIAL

David Durkin

TITLE

Vice President

TELEPHONE

(208) 344-1291

6. EXACT PLANT LOCATION

3491 South TK Avenue, Boise, Idaho 83705

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Food Processing

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: June 9, 2006

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
dba	doing business as
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
°F	degrees Fahrenheit
ft	foot
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/day	pound per day
MMBtu/hr	million British thermal units per hour
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050006

Permittee:	LJD Holdings, Inc. dba B and D Foods	Facility ID No. 001-00162	Date Issued:	June 9, 2006
Location:	Boise, Idaho			

2. OIL HEATER 1 AND OIL HEATER 2 – GAS FIRED

2.1 Process Description

Oil heater 1 and Oil heater 2 heat the oil used in the fryers to cook the meat and poultry. Each heater is identical and is fired on natural gas exclusively.

2.2 Emissions Control Description

Natural gas combustion by-products are the only emissions from the oil heaters. Emissions are uncontrolled. Table 2.1 indicates the emissions units, control device description, and emissions point for each emissions unit.

Table 2.1 OIL HEATER 1 AND 2 DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Oil heater 1	None	Oil heater 1 stack
Oil heater 2	None	Oil heater 2 stack

Emissions Limits

2.3 Opacity Limit

Emissions from each oil heater stack, or any other stack, vent, or functionally equivalent opening associated with each oil heater, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.4 Allowable Fuel

The oil heaters shall be fueled by natural gas exclusively.

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3. HOT OIL FRYER 1 AND HOT OIL FRYER 2

3.1 Process Description

Hot oil fryer 1 and hot oil fryer 2 are conveyor-type fryers that operate in series. Battered meat and poultry pass through oil fryer 1, are recoated with batter, and pass through oil heater 2 until the internal temperature of the product reaches approximately 160⁰ F. The product is frozen in a freezer afterwards.

3.2 Emissions Control Description

The exhaust stack for each fryer connects to form one common stack. The gasses in this common stack pass through a mist eliminator and then through an incinerator. The incinerator is designed to combust the oil in the exhaust gas stream from the fryers. The incinerator is fueled by natural gas exclusively.

Emissions Limits

3.3 Emissions Limits

- PM₁₀ emissions from the two fryers' common exhaust stack shall not exceed 0.34 pound per hour.
- PM₁₀ emissions from the two fryers' common exhaust stack shall not exceed 894 pound per any consecutive 12-month period.

3.4 Opacity Limit

Emissions from the two fryers' common exhaust stack, or any other stack, vent, or functionally equivalent opening associated with the fryers shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

3.5 Allowable Fuel

The incinerator shall be fueled by natural gas exclusively.

3.6 Pressure Drop Across Mist Eliminator

The pressure drop across the Munters TS-5/2-25 mist eliminator shall be maintained in accordance with the manufacturer's specifications and recommendations.

3.7 Incinerator Operations

The permittee shall operate the Maxon NP II incinerator in accordance with the manufacturer's specifications. The Maxon NP II incinerator shall be operating during any frying activities.

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3.8 Visible Emissions Monitoring

The permittee shall monitor visible emissions from the fryer's exhaust stack for at least one 10-minute period per week until one year after permit issuance. If no opacity exceedances are observed after one year, the permittee may begin monitoring visible emissions once per calendar month. If an opacity exceedance is observed during any monthly observation, the permittee shall take immediate corrective action and resume weekly visible emissions observations for the next four consecutive weeks and show no exceedances before resuming the monthly monitoring schedule.

The permittee shall maintain records of the results of each visible emissions observation. The records shall include, at a minimum, the date and results of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken. Records of this information shall be kept on site for the most recent two year period and shall be made available to DEQ representatives upon request.

Reporting and Recordkeeping Requirements

3.9 Pressure Drop Monitoring and Recordkeeping

The permittee shall monitor and record the pressure drop across the mist eliminator once per week while the mist eliminator is operating to demonstrate compliance with Permit Condition 3.6. Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

3.10 Maxon NP II Incinerator O&M Manual

The permittee shall have developed an O&M manual for the Maxon NP II incinerator. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the incinerator. The manual shall contain at a minimum, the following: the recommended incoming air stream temperature and oxygen content, and the routine maintenance and repair procedures for the incinerator. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. A copy of the initial O&M manual, and any subsequent revisions, shall be submitted to DEQ.

3.11 Munters Mist Eliminator O & M Manual

The permittee shall have developed an O&M manual for the Munters mist eliminator. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the mist eliminator. The manual shall contain at a minimum, the following: the recommended pressure drop operating range of the mist eliminator and the routine maintenance and repair procedures for the mist eliminator. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. A copy of the initial O&M manual, and any subsequent revisions, shall be submitted to DEQ.

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4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
 - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.