



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502  
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C.L. "Butch" Otter, Governor  
Curt Fransen, Director

May 20, 2015

Tim Andersen, President  
B & D Foods  
3491 South T.K. Ave.  
Boise, ID 83705

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

Dear Mr. Andersen:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0197 Project 61375 to B & D Foods located at Boise for increasing daily throughput of battered meat and poultry from 60,000 pounds per day to 90,000 pounds per day and annual throughput from 7,500 tons per year to 14,265 tons per year. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received May 22, 2014 and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately and replaces PTC No. P-2007.0197, issued on April 18, 2008. This permit does not release B & D Foods from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, AQ Compliance Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

B & D Foods, Boise  
Page 2 of 2

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 contact Darrin Pampaian at (208) 373-0502 or [darrin.pampaian@deq.idaho.gov](mailto:darrin.pampaian@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with a large initial "M" and "S".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\drp

Permit No. P-2007.0197 PROJ 61375

Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** B & D Foods  
**Permit Number** P-2007.0197  
**Project ID** 61375  
**Facility ID** 001-00162  
**Facility Location** 3491 South T.K. Ave.  
Boise, ID 83705

#### Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

**Date Issued** May 20, 2015



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Darrin Pampaian, P.E., Permit Writer



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Mike Simon, Stationary Source Manager

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# 1 Permit Scope

## Purpose

- 1.1 This is a modified permit to construct (PTC) which authorizes an increase in daily throughput of fried meat and poultry product to the fryers, an increase in daily incinerator and fryer operation, and an increase in annual incinerator and fryer operation.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2007.0197, issued on April 18, 2008.

## Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

**Table 1.1 Regulated Sources**

Permit Section	Source	Control Equipment
2	<u>Oil heater 1:</u> Manufacturer: Eclipse Model: 4IJ. Version 2 Heat input rating: 1.8 MMBtu/hr Fuel: Natural gas only	None
	<u>Oil heater 2:</u> Manufacturer: Maxon Model: #422M Heat input rating: 1.44 MMBtu/hr Fuel: Natural gas only	None
3	<u>Fryer 1:</u> Manufacturer: Immerso-Cook, Maxon Model: 2395.01.900 Heat input rating: 1.5 MMBtu/hr Fuel: Natural gas only	<u>Mist eliminator (in line before the incinerator):</u> Manufacturer: Amistco Model: TM-1109 Control efficiency: 99.9% for PM <sub>10</sub> , 60% for PM <sub>2.5</sub>
	<u>Fryer 2:</u> Manufacturer: Immerso-Cook, Maxon Model: 2395.01.900 Heat input rating: 1.5 MMBtu/hr Fuel: Natural gas only	<u>Incinerator:</u> Manufacturer: Maxon Model: NP II Heat input rating: 1.5 MMBtu/hr Control efficiency: 85.0% for PM <sub>10</sub> Fuel: Natural gas only

## 2 Oil Heaters 1 and 2

### 2.1 Process Description

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

### 2.2 Control Device Descriptions

Table 2.1 Oil Heaters 1 and 2 Description

Emissions Units / Processes	Control Devices	Emission Points
Oil Heater 1	None	HEATER1
Oil Heater 2	None	HEATER2

### Emission Limits

#### 2.3 Opacity Limit

Emissions from the Oil Heaters 1 and 2 stack, or any other stack, vent, or functionally equivalent opening associated with Oil Heaters 1 and 2, 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

Oil Heaters 1 and 2 shall combust natural gas exclusively.

### 3 Fryers 1 and 2

#### 3.1 Process Description

Fryers 1 and 2 are conveyor-type fryers that operate in series. The battered meat and poultry is passed through the hot oil of Fryer 1, recoated with batter, and passed through the hot oil of Fryer 2 until the internal temperatures of the product reaches approximately 160°F. The product is frozen in a freezer afterwards.

#### 3.2 Control Device Descriptions

**Table 3.1 Fryers 1 and 2 Description**

Emissions Units / Processes	Control Devices	Emission Points
Fryer 1	Mist eliminator (in line before the incinerator)	INCINERATOR
Fryer 2	Incinerator	

### Emission Limits

#### 3.3 Emission Limits

The emissions from the Fryer 1 and 2 Incinerator stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

**Table 3.2 Fryer 1 and 2 Incinerator Emission Limits <sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>		PM <sub>2.5</sub> <sup>(b)</sup>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Fryer 1 and 2 and Incinerator combined	0.31	0.886	0.191	0.545

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers and two point five (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

[5/20/2015]

#### 3.4 Opacity Limit

Emissions from the Fryers 1 and 2 Incinerator stack, or any other stack, vent, or functionally equivalent opening associated with the Fryers 1 and 2 Incinerator, 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 Throughput Limits

The combined weight of finished meat and poultry product shall not exceed 90,000 pounds per calendar day and 14,265 tons in any consecutive 12-calendar months.

[5/20/2015]

3.6 Allowable Fuel  
Fryers 1 and 2 and the Incinerator shall combust natural gas exclusively.  
[5/20/2015]

3.7 Pressure Drop Across Mist Eliminator  
The pressure drop across the mist eliminator shall be maintained between 0.01 and 1.0 inches water gauge. The mist eliminator shall be operating during any frying activities.  
[5/20/2015]

3.8 Incinerator Operation  
The permittee shall operate the incinerator in accordance with the manufacturer's specifications. The incinerator shall be operating during any frying activities. In addition, the operating temperature of the incinerator (as measured downstream of the burner) shall be maintained at or above the operating temperature established during the performance test.  
[5/20/2015]

3.9 Visible Emissions Monitoring  
The permittee shall monitor visible emissions from the incinerator 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.

### **Monitoring and Recordkeeping Requirements**

3.10 Throughput Monitoring and Recordkeeping  
The permittee shall monitor and record the combined weight of finished meat and poultry on a calendar day basis to demonstrate compliance with the Throughput Limits permit condition.  
[4/18/2008]

3.11 Mist Eliminator Pressure Drop Monitoring and Recordkeeping  
The permittee shall monitor and record the pressure drop across the mist eliminator once per day while the mist eliminator is operating to demonstrate compliance with the Pressure Drop Across Mist Eliminator Permit Condition.  
[5/20/2015]

3.12 Incinerator Operating Temperature Monitoring and Recordkeeping

The permittee shall monitor and record the operating temperature (established during the performance test) of the incinerator (as measured downstream of the burner) once per day while the incinerator is operating to demonstrate compliance with the Incinerator Operation Permit Condition.

[5/20/2015]

3.13 Mist Eliminator O & M Manual

The permittee shall have developed an O&M manual for the mist eliminator. The O&M manual shall describe the procedures that will be followed to comply with the General Compliance General Provisions 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.

[4/18/2008]

3.14 Incinerator O & M Manual

The permittee shall have developed an O&M manual for the incinerator. The O&M manual shall describe the procedures that will be followed to comply with the General Compliance General Provisions and the manufacturer specifications for the incinerator. The manual shall contain at a minimum, the following:

- The recommended incinerator combustion temperature and oxygen (O<sub>2</sub>) 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.

[5/20/2015]

## Performance Testing Requirements

3.15 PM<sub>10</sub>, PM<sub>2.5</sub>, and Opacity Performance Testing

Performance testing on the incinerator stack shall be performed within 180 days of permit issuance.

The performance test shall measure the PM<sub>10</sub> and the PM<sub>2.5</sub> emission rate in pounds per hour and the opacity to demonstrate compliance with the PM<sub>10</sub> and PM<sub>2.5</sub> Emissions Limit and Opacity Limit permit conditions.

The performance test shall be conducted under worst-case normal operating conditions and in accordance with IDAPA 58.01.01.157, and Performance Testing General Provision of this permit. The permittee is encouraged to submit a performance testing protocol for approval 30 days prior to conducting the performance tests.

[5/20/2015]

3.16 PM<sub>10</sub>, PM<sub>2.5</sub>, and Opacity Performance Testing Methods and Procedures

The permittee shall use EPA Methods 5 and 202, or EPA Methods 201A and 202, or such comparable and equivalent methods approved in accordance with Subsection 157.02.d, to determine compliance with the PM<sub>10</sub> and the PM<sub>2.5</sub> Emissions Limit permit condition.

The permittee shall use EPA Method 9 to determine compliance with the Opacity Limit permit condition with the method of calculating opacity exceedances altered in accordance with IDAPA 58.01.01.625.04.

[5/20/2015]

3.17 Performance Test Monitoring and Recordkeeping

The permittee shall monitor and record the following during the performance test:

- The weight of meat and poultry product to the fryers, in pounds per hour, at least once every 15 minutes,
- The visible emissions observed,
- The mist eliminator pressure drop and the incinerator operating temperature and O<sub>2</sub> content at least once every 15 minutes.

[5/20/2015]

## 4 General Provisions

### General Compliance

4.1 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, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

4.2 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.

[IDAPA 58.01.01.211, 5/1/94]

4.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

### Inspection and Entry

4.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

### Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

4.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- 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; and
- 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.

[IDAPA 58.01.01.211.03, 5/1/94]

## Performance Testing

- 4.7 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.
- 4.8 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.
- 4.9 Within 60 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.

[IDAPA 58.01.01.157, 4/5/00]

## Monitoring and Recordkeeping

- 4.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

## **Excess Emissions**

- 4.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

- 4.12 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.

[IDAPA 58.01.01.123, 5/1/94]

## **False Statements**

- 4.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

## **Tampering**

- 4.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

## **Transferability**

- 4.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

## **Severability**

- 4.16 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.

[IDAPA 58.01.01.211, 5/1/94]