



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

October 11, 2017

Tim Andersen, President
LJD Holdings, Inc. dba B&D Foods
3494 South TK Avenue
Boise, Idaho 83705

RE: Facility ID No. 001-00162, LJD Holdings, Inc. dba 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 61907 to LJD Holdings, Inc. dba B&D Foods located at 3494 South TK Avenue in Boise to increase daily meat and poultry throughput and to replace control equipment. 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 June 8, 2017, and supplemental information received on July 18, 2017.

This permit is effective immediately and replaces PTC No. P-2007.0197 Project 61375, issued on May 20, 2015. 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. 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.

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 Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division
MSML
Permit No. P-2007.0197 Project 61907
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	LJD Holdings, Inc. dba B&D Foods
Permit Number	P-2007.0197
Project ID	61907
Facility ID	001-00162
Facility Location	3491 South TK Avenue 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 October 11, 2017



Morrie Lewis, Permit Writer



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, the installation and operation of a broiler heater, a decrease in annual heater and fryer operation, and replacement of control equipment for the fryers.

[October 11, 2017]

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 Project 61375, issued on May 20, 2015.

[October 11, 2017]

Regulated Sources

1.4 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 Date of Construction: 2006 Maximum Operation: 18 hr/day and 260 day/yr Fuel: Natural gas only	None
	<u>Oil Heater 2</u> Manufacturer: Maxon Model: 422M Heat input rating: 1.44 MMBtu/hr Date of Construction: 2006 Maximum Operation: 18 hr/day and 260 day/yr Fuel: Natural gas only	None
	<u>Broiler Heater</u> Manufacturer: Sellers Model: M Series Ultra Low NO _x Heat input rating: 2.3 MMBtu/hr Date of Construction: 2017 Maximum Operation: 24 hr/day and 260 day/yr Fuel: Natural gas only	Low-NO _x burners
3	<u>Fryer 1</u> Manufacturer: Immerso-Cook, Maxon Model: 2395.01.900 Heat input rating: 1.5 MMBtu/hr Maximum Production: 120,000 lb product/day Maximum Operation: 20 hr/day and 260 day/yr Fuel: Natural gas only	<u>Cyclonic Scrubber, Wet Scrubber, and Mist Eliminator</u> Manufacturer: Air Clear, Inc. Model: CS-PF-30 Pressure drop: 1-12 iwg Heat input rating: 1.5 MMBtu/hr Control efficiency: 99.95% for PM ₁₀ Fuel: Natural gas only
	<u>Fryer 2</u> Manufacturer: Immerso-Cook, Maxon Model: 2395.01.900 Heat input rating: 1.5 MMBtu/hr Maximum Production: 120,000 lb product/day Maximum Operation: 20 hr/day and 260 day/yr Fuel: Natural gas only	

[October 11, 2017]

2 Oil Heaters and Broiler

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 Equipment Descriptions

Table 2.1 Oil Heaters 1 and 2 Description

Emissions Units / Processes	Control Equipment	Emission Points
Oil Heater 1	None	HEATER1 stack
Oil Heater 2	None	HEATER2 stack
Broiler Heater	Low NO _x burners	BROILER HEATER stack

[October 11, 2017]

Emission Limits

2.3 Opacity Limit

Emissions from the Oil Heater 1 stack, the Oil Heater 2 stack, the Broiler Heater stack, or any other stack, vent, or functionally equivalent opening associated with Oil Heater 1, Oil Heater 2, or the Broiler 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.

[October 11, 2017]

2.4 Fuel-Burning Equipment PM Limit

Emissions from the Oil Heater 1 stack, the Oil Heater 2 stack, the Broiler Heater stack, or any other stack, vent, or functionally equivalent opening associated with Oil Heater 1, Oil Heater 2, or the Broiler Heater, shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas fuel in accordance with IDAPA 58.01.01.676-677.

[October 11, 2017]

Operating Requirements

2.5 Allowable Fuel

Oil Heaters 1 and 2 and the Broiler Heater shall combust natural gas exclusively.

[October 11, 2017]

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	Cyclonic Scrubber, Wet Scrubber, and Mist Eliminator	Wet Scrubber stack
Fryer 2		

[October 11, 2017]

Emission Limits

3.3 Emission Limits

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

Table 3.2 Fryer 1 and 2 Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)	
	lb/hr ^(c)	T/yr ^(d)
Fryer 1 and 2 (combined)	0.283	0.737

- In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM₁₀), including condensable particulate as defined in IDAPA 58.01.01.006.
- 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.
- Tons per any consecutive 12-calendar-month period.

[October 11, 2017]

3.4 Opacity Limit

Emissions from the Fryer 1 and 2 Wet Scrubber 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.

[October 11, 2017]

3.5 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

[October 11, 2017]

Operating Requirements

3.6 Throughput Limits

The combined weight of finished meat and poultry product shall not exceed 120,000 pounds per calendar day and 15,600 tons in any consecutive 12 calendar months. Throughput shall be limited to 90,000 pounds per calendar day and 14,265 tons in any consecutive 12-calendar months until required performance testing has been completed (Permit Condition 3.20).

[October 11, 2017]

3.7 Fryer Operation

Operation of Fryers 1 and 2 shall not exceed 20 hours per calendar day and 260 days per consecutive 12-calendar-month period.

[October 11, 2017]

3.8 Broiler Operation

Operation of the Broiler Heater shall not exceed 260 days per consecutive 12-calendar-month period.

[October 11, 2017]

3.9 Allowable Fuel

Fryers 1 and 2 shall combust natural gas exclusively.

[October 11, 2017]

3.10 Wet Scrubber Pressure Drop

The pressure drop across the Wet Scrubber shall be maintained above 1 inches water gauge.

[October 11, 2017]

3.11 Wet Scrubber Flow

The scrubbing media flow rate in the Wet Scrubber shall be maintained above the minimum flow rate established during performance testing.

[October 11, 2017]

3.12 Control Equipment Replacement

Until such time that the Cyclonic Scrubber, Wet Scrubber, and Mist Eliminator have been installed, frying activities may be conducted by the permittee only while the existing mist eliminator and incinerator control equipment are operating in accordance with manufacturer's specifications.

[October 11, 2017]

3.13 Control Equipment Operation

The permittee shall install the Cyclonic Scrubber, Wet Scrubber, and Mist Eliminator control equipment on or before January 15, 2018, and shall operate the control equipment in accordance with the manufacturer's specifications. Following installation, the Wet Scrubber and Mist Eliminator shall be operating during any frying activities.

[October 11, 2017]

3.14 Visible Emissions Monitoring

The permittee shall monitor visible emissions from the Wet Scrubber exhaust stack for at least one 10-minute period per week for one year following installation. 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.

[October 11, 2017]

Monitoring and Recordkeeping Requirements

3.15 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with Odors limits. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[October 11, 2017]

3.16 Throughput Monitoring and Recordkeeping

The permittee shall monitor and record the combined weight of finished meat and poultry on a calendar day basis and on a rolling 12-calendar-month basis to demonstrate compliance with the Throughput Limits permit condition.

[October 11, 2017]

3.17 Fryer and Broiler Operation Monitoring

The permittee shall monitor and record the operating hours of Fryer 1, Fryer 2, and the Broiler Heater on a calendar day basis and on a rolling 12-calendar-month basis to demonstrate compliance with Fryer Operation and Broiler Operation limits.

[October 11, 2017]

3.18 Wet Scrubber Pressure Drop and Flow Monitoring and Recordkeeping

The permittee shall monitor and record once per day the scrubbing media flow rate in gallons per minute and the pressure drop across the Wet Scrubber in inches of water, while the Wet Scrubber is operating to demonstrate compliance with the Wet Scrubber Pressure Drop and the Wet Scrubber Flow permit condition.

[October 11, 2017]

3.19 Control Equipment O&M Manual

The permittee shall have developed an O&M manual for the Wet Scrubber and 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 system exhaust airflow and routine fan speed adjustment procedures,
- The recommended fiberbed filter life,

- The recommended process exhaust temperature limits, 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.

[October 11, 2017]

Performance Testing Requirements

3.20 Performance Testing

Performance testing on the Fryer 1 and 2 Wet Scrubber stack shall be performed within 180 days following installation of the Cyclonic Scrubber, Wet Scrubber, and Mist Eliminator.

The performance test shall measure the PM₁₀ emission rate in pounds per hour and the opacity to demonstrate compliance with the PM₁₀ emission limit and the Opacity Limit.

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.

[October 11, 2017]

3.21 Performance Testing Methods and Procedures

The permittee shall use EPA Methods 5 and 202 or such comparable and equivalent methods approved in accordance with Subsection 157.02.d, to determine compliance with the PM₁₀ emissions limit.

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

[October 11, 2017]

3.22 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 wet scrubber pressure drop at least once every 15 minutes.
- The wet scrubber media flow rate at least once every 15 minutes

[October 11, 2017]

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]