

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1709-AR-2

IS ISSUED TO:

Boar's Head Provisions Co., Inc.
2530 West Broadway
Forrest City, AR 72335
St. Francis County
CSN: 62-0125

THIS PERMIT IS YOUR AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND YOUR APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

SECTION I: FACILITY INFORMATION

PERMITTEE: Boar's Head Provisions Co., Inc.
CSN: 62-0125
PERMIT NUMBER: 1709-AR-2

FACILITY ADDRESS: 2530 West Broadway
Forrest City, AR 72335

COUNTY: St. Francis

CONTACT POSITION: Beth Baldwin
TELEPHONE NUMBER: (434) 535-8581

REVIEWING ENGINEER: Karen Cerney

UTM North-South (Y): 3874.6 km
UTM East-West (X): 699.9 km
Zone 15

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SECTION II: INTRODUCTION

Summary

Boar's Head Provisions Co., Inc. owns and operates a food manufacturing facility in Forrest City. The facility manufactures various types of deli meats. This modification to the permit will allow SN-01 and SN-02 to alternate between natural gas and fuel oil without notification to the Department of the switch in fuels.

Process Description

Raw meat and poultry products are received at a loading dock. After receiving, the meat is transferred to storage coolers. The raw meat and the raw poultry are taken from the storage coolers to separate rooms for processing. The raw product is injected with curing and/or seasoning solutions and massaged. After massaging, some product is returned to storage for curing and the rest is taken to pack lines to be placed in stainless steel molds or nets. Sausage materials are brought to raw processing for commutation, mixing, and stuffing.

Whole muscle products are packed in nets and/or molds and placed on shelf trees which hang from overhead rails. Sausage products are placed on stainless steel sticks and hung on trees. After trees have been filled, they are transported by overhead rail to a raw staging cooler to await thermal processing. Ham products to be water cooked will be placed in stainless steel molds and then placed in stainless steel cooking baskets. Baskets are then transferred by conveyor to the ham cook room for thermal processing.

Water cooked ham baskets are placed in dunk tanks with an overhead crane. After the thermal processing, the ready to eat (RTE) molded ham products are placed in another series of dunk tanks for the first phase of chilling. RTE molded ham products are chilled to approximately 80⁰ F using either cold water or brine. After the first phase of chilling, baskets are removed from tanks and placed on stands called trees. The stands are moved by pallet jacket to the molded ham chill cooler to complete chilling and await vacuum packaging.

Raw treed products are moved from the staging cooler to process ovens for thermal processing. After thermal processing, RTE treed products are transferred to blast cells for chilling. Upon completion of chilling, the treed RTE product is moved to equalization coolers to await vacuum packaging or second handling (oven browning).

RTE product that receives a second handling is moved to a browning room where the molds are removed. After browning, the RTE product is placed back on the trees and

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returned to equalization coolers to remove heat gained during the browning process and to await vacuum packaging.

All chilled RTE products are moved to packaging where they are vacuum packed. The packaged product is then transferred to another room to await shipping.

Dirty equipment is sent to one of two wash rooms prior to being used again. Inedible materials are placed in barrels and are denatured. The barrels are stored and exit through an overhead door. Trash generated during the raw meat processing is taken to the trash room for disposal. Trash generated during the RTE processing is taken to another trash room.

Dry goods used in raw processing are stored in a dry storage room. Dry goods used in RTE processing are stored in a different dry storage room.

Sources SN-01, SN-02, and SN-03 are used for heating water used for facility and personnel sanitation.

Regulations

The facility is subject to regulation under the *Arkansas Air Pollution Control Code (Air Code)*, the *Arkansas State Implementation Plan for Air Pollution Control (SIP)*, and the *New Source Performance Standards (NSPS)* of 40 CFR Part 60, Subpart Dc.

The following table is a summary of the facility's total emissions.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	1.2	4.8
PM ₁₀	1.2	4.8
SO ₂	22.4	97.2
VOC	0.4	1.2
CO	7.5	16.2
NO _x	43.4	59.5

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SECTION III: PERMIT HISTORY

Permit No. 1709-A, issued October 1, 1996, to Boar's Head Provisions Company, was the initial air permit for the facility. The permit outlined the facility's various operations involved in the manufacture of deli meats in St. Francis County. All permitted emissions resulted from the combustion of natural gas at the facility.

Permit No. 1709-A-1, issued December 3, 2001, to Boar's Head Provisions Company, was a modification to the initial permit. It incorporated the use of No. 2 fuel oil in two boilers and allowed for the installation of a new Kemco natural gas direct fired hot water heater.

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SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Boiler #1	PM ₁₀	0.6	2.4
		SO ₂	8.6	37.3
		VOC	0.2	0.6
		CO	1.4	6.0
		NO _x	5.4	23.4
02	Boiler #2	PM ₁₀	0.6	2.4
		SO ₂	8.6	37.3
		VOC	0.2	0.6
		CO	1.4	6.0
		NO _x	5.4	23.4
03	KemCo Direct Fire Water Heater	CO	1.7	3.5
		NO _x	1.7	3.5
04	Caterpillar 1000kW Generator	SO ₂	5.16	22.6
		CO	3.0	0.7
		NO _x	40.9	9.2

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Boiler #1	PM	0.6	2.4
02	Boiler #2	PM	0.6	2.4

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions

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shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
Facility	5%	19.304

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall use only pipeline quality natural gas at source SN-03.
7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use more than 455,144,000 standard cubic feet of natural gas at sources SN-01, SN-02, & SN-03 during any consecutive 12 month period.
8. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #7. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

Fuel Oil Conditions

9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the following table outlines the amount of #2 fuel oil that may be used at

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each source during any consecutive 12 month period.

Source	#2 Fuel Oil Usage (gal)
SN-01	1,047,434
SN-02	1,047,434
SN-04	32,490

10. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #9. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.
11. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall **sample and analyze each shipment of fuel oil to determine the sulfur content. The sulfur content shall not exceed 0.5 weight percent. Fuel oil sampling and analysis may be performed and certified by the owner or operator of an affected unit, an outside laboratory, or the fuel supplier.**
12. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may alternate between natural gas and fuel oil to fire Sources SN-01 and SN-02.

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SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated January 29, 2001.

Description	Category
10,000 gallon storage tank containing #2 fuel oil	A-3
1,500 gallon storage tank containing used oil	A-3

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SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

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6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met:
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.

11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
 - c. To inspect any monitoring equipment or monitoring method required in this permit
 - d. To sample any emission of pollutants
 - e. To perform an operation and maintenance inspection of the permitted source

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12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

APPENDIX A

APPENDIX B

APPENDIX C

INVOICE REQUEST FORM

PDS-

Date February 21, 2003

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 62-0125
Facility Name Boar's Head Provisions Co., Inc.
Invoice Mailing Address 1950 Industry Place
Petersburg, Virginia 23805

<input type="checkbox"/>	Initial
<input checked="" type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1709-AR-2
Permit Description Minor Source
Permit Fee Code A

Amount Due \$ 0.00

Engineer Karen Cerney

Paid? No Yes Check #

Comments: Air Permit Fee Calculation

$\$19.93 * 0.0$ tons net increase predominant air contaminant = \$0.00

This was sent in as an AA, and approved as an AA. It has been changed to a De Minimis per Tom Rheume on January 3, 2003 with no balance to Boars Head Provisions Co., Inc.

Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Boar's Head Provisions Co., Inc., CSN: 62-0125, owns and operates a food manufacturing facility located at 2530 West Broadway in Forrest City, St. Francis County. The facility manufactures various types of deli meats. This modification to the permit will allow Boar's Head Provisions Co., Inc. to alternate between natural gas and fuel oil for SN-01 and SN-02. There are no emission increases associated with this modification.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Suzanne Carswell, Information Officer. Citizens desiring technical information concerning the application or permit should contact Karen Cerney, Engineer. Both Suzanne Carswell and Karen Cerney can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the **Forrest City Public Library, 421 S. Washington, Forrest City, AR 72335**. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Suzanne Carswell. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Richard A. Weiss
Interim Director