

ADEQ  
MINOR SOURCE  
AIR PERMIT

Permit #: 1709-AR-3

IS ISSUED TO:

Boar's Head Provisions Co., Inc.  
2530 West Broadway  
Forrest City, AR 72335  
St Francis County  
AFIN: 62-00125

THIS PERMIT IS THE AUTHORITY FOR BOAR'S HEAD PROVISIONS CO., INC. 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 THE 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:

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Michael Bonds  
Chief, Air Division

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Date

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**Boar's Head Provisions Co., Inc.**

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**Section I: FACILITY INFORMATION**

PERMITTEE: Boar's Head Provisions Co., Inc.  
PO Box 2655  
Holland, Michigan

AFIN: 62-00125

PERMIT NUMBER: 1709-AR-3

FACILITY ADDRESS: 2530 West Broadway  
Forrest City, AR 72335

COUNTY: St Francis

CONTACT PERSON: Elizabeth Bobe

CONTACT POSITION Environmental Manager

TELEPHONE NUMBER: (616) 394-4746

REVIEWING ENGINEER: Jim Siganos

UTM North-South (Y): Zone 15, 3874.6 km

UTM East-West (X): Zone 15, 699.9 km

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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 (NAICS Code 311612). This modification to permit #1709-AR-2 will allow the use of a 2000 Kw Diesel engine driven electric power generator (NAICS Code 423610) designated as SN-05. This generator will provide electrical energy for plant operations during the months of June through September. Potential emissions will increase by 12.9 tpy for NO<sub>x</sub>, 3.4 tpy for CO, 2.1 tpy for SO<sub>2</sub> and 1.0 tpy for VOCs.

### **Process Description – Electric Generator**

Diesel fuel is transferred from an existing 10,000 gallon above ground # 2 diesel fuel storage tank (NAICS Code 423610) to fuel the 2,934 HP four stroke diesel engine which drives the 2000 Kw electric generator. The electric power generated will be used for production plant operations.

### **Process Description – Food Manufacturing Facility**

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.

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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 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.

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### **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. (Appendix A)

The following table is a summary of the facility's total emissions. This table in itself is not an enforceable condition of the permit.

**Table 1 - Total Allowable Emissions**

<b>Total Allowable Emissions</b>		
<b>Pollutant</b>	<b>Emissions Rates</b>	
	<b>lb/hr</b>	<b>tpy</b>
PM	1.7	4.9
PM <sub>10</sub>	1.7	4.9
SO <sub>2</sub>	34.3	99.3
VOC	6.2	2.2
CO	26.6	19.6
NO <sub>x</sub>	126.3	72.1

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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.

Permit No. 1709-AR-2, issued February 12, 2003 to Boar's Head Provisions Co., Inc. was modified to allow SN-01 and SN-02 to alternate between natural gas and fuel oil without notification to the Department of the switch in fuels.

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**Section IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

1. The permittee will not exceed the emission rates set forth in the following table. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective December 19, 2004, (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 2 - Criteria Pollutants**

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>Tpy</b>
01	Boiler #1 500 HP	PM <sub>10</sub>	0.6	2.4
		SO <sub>2</sub>	8.6	37.3
		VOC	0.2	0.6
		CO	1.4	6.0
		NO <sub>x</sub>	5.4	23.4
02	Boiler #2 500 HP	PM <sub>10</sub>	0.6	2.4
		SO <sub>2</sub>	8.6	37.3
		VOC	0.2	0.6
		CO	1.4	6.0
		NO <sub>x</sub>	5.4	23.4
03	KemCo Direct Fire Water Heater	CO	1.7	3.5
		NO <sub>x</sub>	1.7	3.5
04	Caterpillar 1000kW Generator	SO <sub>2</sub>	5.2	22.6
		CO	3.0	0.7
		NO <sub>x</sub>	40.9	9.2
05	Caterpillar 2000 Kw Generator 2934 HP Diesel Engine	PM <sub>10</sub>	0.5	0.1
		SO <sub>2</sub>	11.9	2.1
		VOC	5.8	1.0
		CO	19.1	3.4
		NO <sub>x</sub>	71.2	12.6



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2. The permittee will not exceed the emission rates set forth in the following table. [§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]

**Table 3 - Non-Criteria Pollutants**

SN	Description	Pollutant	lb/hr	tpy
01	Boiler #1	PM	0.6	2.4
02	Boiler #2	PM	0.6	2.4
05	2000 Kw Generator Engine (2932 HP)	PM	0.5	0.1

3. Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 4 - Visible Emissions**

SN	Limit	Regulatory Citation
Facility	5%	19.503

4. The permittee will 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. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. The permittee shall not use more than 455,144,000 standard cubic feet of *pipeline quality natural gas* at sources SN-01, SN-02, & SN-03 during any consecutive 12 month period. Compliance with this condition shall be demonstrated by compliance with Specific Condition #7. *Pipeline quality natural gas* is defined as a natural gas which contains 0.5 grains or less of total sulfur per 100 standard cubic feet, and must either be composed of at least 70 percent methane by volume or has a gross calorific value between 950 and 1100 Btu per standard cubic foot. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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- 7. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].
- 8. The permittee shall not use more than the amount of #2 fuel oil at each source shown in the following table during any consecutive 12 month period. Compliance shall be demonstrated by complying with Specific Condition #9. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

- 9. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #8. 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 10. 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 11. The permittee may alternate between *pipeline quality natural gas* and fuel oil to fire Sources SN-01 and SN-02. [Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 12. The permittee shall only operate the 2000 Kw generator engine which is fired with # 2 fuel oil, and designated as SN-05, for 352 hours during any consecutive 12 month period. Compliance shall be demonstrated by complying with Specific Condition #13. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 13. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #12. 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]

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**NSPS Requirements-Boilers (SN-01 & 02)**

14. Pursuant to §19.304 of Regulation 19, and 40 CFR 60, Subpart Dc-*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* Appendix A) SN-01 and SN-02 are affected units because they were constructed after June 9, 1989.
15. Pursuant to §19.304 of Regulation 19, and 40 CFR 60, §60.48c (g)(i), the owner or operator of SN-01 and SN-02 shall record and maintain records of the amounts of each fuel combusted every month. All records of fuel combusted shall be maintained by the owner or operator for a period of two years following the date of such record.

**Testing 2000Kw Generator Engine, (SN-05)**

16. The permittee shall conduct testing for NO<sub>x</sub> and CO on the 2000 Kw generator engine (SN-05) in accordance with General Condition 7. EPA Reference Method 7E shall be used to determine NO<sub>x</sub> and EPA Reference Method 10 shall be used to determine CO. The permittee shall test the engine within 90% of its rated capacity. If the engine is not tested within this range, the permittee shall be limited to operating within 10% above the tested rate. [Regulation 19, §19.702 and 40 CFR Part 52, Subpart E]

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**Section V: INSIGNIFICANT ACTIVITIES**

The Department deems the following types of activities or emissions as 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 **November 22, 2004**.

**Table 5 - Insignificant Activities**

<b>Description</b>	<b>Category</b>
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 that 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 that 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. This permit does 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 under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§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]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§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]
5. The permittee must keep records for five years to 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 Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§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]

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6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§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]

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

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§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]
8. The permittee will provide: [§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]
  - 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. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§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]

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10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will 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: [§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]
  - 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 the permittee took all reasonable measures 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 must 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, the information need not be submitted again.
  
11. The permittee will allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - 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; and
  - e. To perform an operation and maintenance inspection of the permitted source.

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12. The Department issued this permit 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. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Arkansas Water and Air Pollution Control Act. [§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]
14. This permit may be transferred. An applicant for a transfer must 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. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§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]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]



## **APPENDIX A**