

Lane Regional Air Protection Agency
Minimal Source Air Contaminant Discharge Permit

REVIEW REPORT

Cascade Estates Coffees

Permit No: 201283

PERMITTING

Permitting Action

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was renewed on December 9, 2001, and was scheduled to expire on December 8, 2006. Because the Facility has installed an afterburner on the Sivetz roaster since last renewal, this renewal has eliminated the restriction on the number of roasts per hour conducted in the Sivetz roaster. This renewal has added afterburner temperature and monitoring requirements pertaining to the Sivetz roaster.

Other Permits

2. No other permits have been issued or are required by LRAPA for this source.

Attainment Status

3. The source is located in an attainment area for all pollutants except PM₁₀ (particulate matter less than 10 microns in size). The Eugene/ Springfield Air Quality Management Area is a non-attainment area for PM₁₀.

SOURCE DESCRIPTION

Overview

4. The source operates a coffee roasting operation at 134 Grimes Street in Eugene. The source controls PM (particulate matter)/PM₁₀ emissions and VOC (volatile organic compounds) by the use of an afterburner on both the Sivetz and San Franciscan coffee roasters. Total annual production of finished product for the facility is approximately 10 tons of roasted coffee beans. The facility was issued its initial ACDP in 1996. Baseline Emissions were not set in the permit because the source is well below the Significant Emission Rates as listed in Title 38 of LRAPA's Rules and Regulations.
5. The afterburner on the Sivetz was installed in April of 2004 (Notice to Construct 201283-A03).

Process and Control Devices

6. Existing air contaminant sources at the facility consist of the following:
 - a. A San Franciscan roaster each equipped with afterburner.
 - b. A Sivetz roaster equipped with afterburner.

EMISSIONS

6. The pollutant(s) of concern associated with this source type are PM, PM10 and VOCs. Using the emission factors and afterburner efficiencies (DEQ coffee roaster permit template, and 'AIRS Facility Subsystem (AFS) Source Classification and Emission Factor Listing, March 1990, coffee roasting) listed in the table below and an expected facility total throughput of 10 tons of coffee roasted, the emission calculation details are as follows:

Device/Process	Pollutant	Annual Throughput	Emission Factor (lb /ton coffee roasted)*	Afterburner control efficiency	Emissions lbs/yr
Sivetz/San Franciscan Roaster	PM	10 tons	4.2 lb/ton coffee roasted	60%	17
Sivetz/San Franciscan Roaster	PM10	10 tons	0.6 lb/ton coffee roasted	60%	3
Sivetz/San Franciscan Roaster	VOC	10 tons	2.6 lb/ton coffee roasted	95%	1
Natural gas Combustion from Both Roasters	NOx	2.2 million cubic feet of natural gas	100 lb/10 ⁶ cubic feet of natural gas burned	na	220

* from DEQ Permitting and Inspection Manual

MINIMAL PERMIT DETERMINATION

7. The Authority has determined that the source qualifies as a minimal source for the following reasons:
 - a. Emissions from this source are estimated to be less than 5 tons per year of particulate matter and less than 10 tons per year for the criteria gaseous pollutants.
 - b. The facility was inspected on July 3, 2002, and found to be in compliance with permit conditions.

SPECIAL CONDITIONS

8. The permit contains special operation and maintenance requirements for the afterburners.

NESHAPS/MACT APPLICABILITY

10. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

NSPS APPLICABILITY

11. There are no sources at this facility for which NSPS standards have been promulgated.

ENFORCEMENT HISTORY

The facility was issued Notice of Violation and Civil Penalty Assessment (NCP) 07-2922 on August 8, 2007 for an opacity violation from the Sivetz roaster stack that occurred on April

23, 2007. NCP 07-2922 included a civil penalty assessment of \$3600. On September 7, 2007 LRAPA and the Facility entered into Stipulated Final Order 07-2922 in which the originally assessed civil penalty of \$3600 was reduced to \$1800. The \$1800 amount was paid on September 9, 2007 and file NCP/SFO 07-2922 was closed.

PUBLIC NOTICE

Renewal

13. The draft permit was on public notice from November 2, 2007 to December 3, 2007. No comments were submitted during the 30-day comment period.

JM/cmw
12/10/07