

ASSIGNMENT

to

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
 1010 Main St
 Springfield, OR 97477
 (541) 736-1056

PERMITTEE:

Wandering Goat Coffee Co.
 P.O. Box 409
 Eugene, OR 97440

INFORMATION RELIED UPON:

Application No.: 64471
 Date Received: November 9, 2018

PLANT SITE LOCATION:

268 Madison Street
 Eugene, OR 97402

LAND USE COMPATIBILITY STATEMENT:

Approving Authority: City of Eugene
 Approval Date: December 7, 2005

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Section 37-0060 and based on the land use compatibility findings included in the permit record.



Merlyn L. Hough, Director

NOV 14 2018

Dated

General Air Contaminant Discharge Permit Issued in Accordance with Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description	SIC
AQGP-016	10/11/2028	Coffee roasting, 30 tons per year or more of roasted product (Title 37, Table 1, Part B, 21)	2095

SUPPLEMENTAL INFORMATION:

Facility contact:		
Name:	Michael Nixon	
Title:	Owner	
Phone number:	541-344-5161	
e-mail address:	michael@wanderinggoat.com	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	No	N/A
Reports Required:		
Annual	Yes	February 15
NSPS	N/A	N/A
NESHAP	N/A	N/A
Other	N/A	N/A
Public Notice	Category I	
Application review report:		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete and the subject facility qualifies for assignment to the General ACDP.		



**GENERAL
 AIR CONTAMINANT DISCHARGE PERMIT**

Lane Regional Air Protection Agency
 1010 Main Street
 Springfield, OR 97477
 (541) 736-1056

This permit is issued in accordance with the provisions of ORS 468A.040 and LRAPA 37-0060

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Merlyn Hough OCT 11 2018

 Merlyn Hough, Director Dated

Table 1 Code	Source Description	SIC	NAICS
Part B, 21	Coffee roasting, 30 tons per year or more roasted product	2095	31192

TABLE OF CONTENTS

1.0 PERMIT ASSIGNMENT2
 2.0 GENERAL EMISSION STANDARDS AND LIMITS2
 3.0 OPERATION AND MAINTENANCE REQUIREMENTS3
 4.0 PLANT SITE EMISSION LIMITS4
 5.0 COMPLIANCE DEMONSTRATION5
 6.0 RECORDKEEPING REQUIREMENTS6
 7.0 REPORTING REQUIREMENTS7
 8.0 ADMINISTRATIVE REQUIREMENTS8
 9.0 FEES9
 10.0 GENERAL CONDITIONS AND DISCLAIMERS10
 11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS11

1.0 PERMIT ASSIGNMENT

- 1.1 Qualifications** All of the following conditions must be met in order to qualify for assignment to this permit:
- a. The permittee is performing coffee roasting as described on the cover page of this permit, including supporting activities.
 - b. A Simple or Standard ACDP is not required for the source.
 - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Assignment** LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with the LRAPA's regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the requirements of Section 37-0060 and the conditions of this permit.
- 1.3 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Standard Permit or additional General ACDPs, if applicable.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible Emissions** The permittee must comply with the following visible emission limits, as applicable:
- a. Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour.
 - b. Observations must be recorded at 15-second intervals as specified in LRAPA 32-010(2).
 - c. The visible emissions standard in this condition does not apply to fugitive emissions from the source.
- 2.2 Particulate Matter Emissions** Particulate matter emissions from any air contaminant source, other than fugitive emission sources, must not exceed 0.10 grains per dry standard cubic foot.
- 2.3 Fugitive Emissions** The permittee must comply with the following, as necessary:
- a. The permittee must take reasonable precautions to prevent fugitive particulate matter from becoming airborne from all site

operations from which it may be generated. Such reasonable precautions may include, but not be limited to:

- i. Treating vehicular traffic areas of the plant site under the control of the permittee, including parking lots and dry work yards.
 - ii. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
 - iii. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.
- b. For purposes of this condition, fugitive particulate emissions are visible emissions that leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period.
 - c. Fugitive particulate emissions are determined by EPA Method 22 at the downwind property boundary.
 - d. If requested by LRAPA, the permittee must develop and submit a fugitive emission control plan for LRAPA approval. The plan must include best management practices the permittee will implement to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period. The plan must also include monitoring by the permittee, following the procedures of EPA Method 22. Once approved by LRAPA, the permittee must follow the plan.

2.4 Particulate Matter Fallout The permittee must not cause or permit the emission of particulate matter larger than 250 microns in size at sufficient duration or quantity as to create an observable deposition upon the real property of another person.

2.5 Nuisance and Odors The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel.

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

3.1 Rule Citation LRAPA Title 32, Section 32-007 gives LRAPA the authority to require Operating, Maintenance, and Work Practice Requirements (See Condition 3.2) to ensure that the permittee is operating and maintaining air pollution control equipment at the highest reasonable efficiency and effectiveness to minimize emissions.

3.2 Afterburner Operation If the permittee has installed an afterburner to control odor or visible emissions, then the following conditions must be met:

- a. Gas effluents from process afterburners must be maintained at:

- i. a temperature of 1,400°F for at least a 0.5-second residence time; or
- ii. LRAPA approval to operate at a lower temperature;
- b. The permittee must maintain and operate a continuous monitoring system for final combustion chamber temperature; and
- c. The permittee must install and operate the monitoring system in accordance with the manufacturer's instructions. The permittee must calibrate the continuous temperature monitor and all associated equipment at least once per calendar year.

4.0 PLANT SITE EMISSION LIMITS

4.1 Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following:

Pollutant	Limit	Units
PM	24	tons per year
PM ₁₀	14	tons per year
PM _{2.5}	9	tons per year
SO ₂	39	tons per year
NO _x	39	tons per year
CO	99	tons per year
VOC	39	tons per year

4.2 Annual Period The annual plant site emissions limits apply to any 12-consecutive calendar month period.

5.0 COMPLIANCE DEMONSTRATION

5.1 PSEL Compliance Monitoring Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E = \Sigma(EF \times P) \times CE/2000$$

where,

- E = pollutant emissions (tons/yr);
- Σ = symbol representing "summation of";
- EF = pollutant emission factor (see Condition 5.2);
- P = process production (tons of coffee roasted)
- CE = control efficiency (see Condition 5.2)

5.2 Emission Factors The permittee must use the default emission factors provided below for calculating pollutant emissions, unless alternative emission factors are approved by LRAPA. The permittee may request or LRAPA may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by LRAPA.

Emissions device or activity	Pollutant	Emission Factor (EF)*	Emission factor units
Destoner	PM/PM ₁₀ / PM _{2.5}	1.4	lb/ton of coffee roasted
Roaster	PM	4.2	lb/ton of coffee roasted
	PM ₁₀ /PM _{2.5}	0.6	lb/ton of coffee roasted
	VOC	2.6	lb/ton of coffee roasted
Natural Gas Combustion	SO ₂	1.7	lb/million cubic feet of natural gas burned
	NO _x	100	lb/million cubic feet of natural gas burned
	CO	84	lb/million cubic feet of natural gas burned
	VOC	5.5	lb/million cubic feet of natural gas burned

*- if fuel, other than natural gas, is used to operate crematory incinerator unit, contact your LRAPA representative for appropriate emission factors to be used to calculate pollutant emissions and determine compliance with the plant site emission limits.

5.3 Control Efficiency The permittee must meet the following control efficiencies, as applicable:

Control Device	Pollutant	Control Efficiency
Direct-flame Afterburner	PM/PM ₁₀ / PM _{2.5}	60%
	VOC	95%
Catalytic Converter	PM/PM ₁₀ /PM _{2.5}	95%
	VOC	95%

6.0 RECORDKEEPING REQUIREMENTS

6.1 Monitoring Requirements The permittee must monitor and maintain records of the operation and maintenance of the plant and associated air contaminant control devices as follows:

- a. Amount of raw (green) beans roasted – tons per month
- b. Amount of natural gas used – cubic feet per month
- c. Temperature in the final combustion chamber -°F continuously

6.2 Operation and Maintenance The permittee must maintain all records associated with continuous monitoring data, including, but not limited to, original data sheets, charts, calculations, calibration data, production records and final reports related to the operation and maintenance of the plant and associated air contaminant control devices.

6.3 Excess Emissions The permittee must maintain records of excess emissions as defined in LRAPA Title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60-minute period.

6.4 Complaint log The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee’s actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

6.5 Retention of Records Unless otherwise specified, all records must be maintained on site for a period of five (5) years and will be made available to LRAPA upon request.

7.0 REPORTING REQUIREMENTS

- 7.1 Excess Emissions** The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health.
- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 8.2.
 - b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - c. The permittee must also submit follow-up reports when required by LRAPA.
- 7.2 Annual Report** The permittee must submit to LRAPA by **February 15** of each year this permit is in effect, two (2) copies of the following information for the preceding calendar year:
- a. Operating parameters:
 - i. Amount of raw (green) beans roasted (tons per calendar year)
 - ii. Highest amount of raw (green) beans roasted within a month
 - iii. Amount of natural gas used (therms or cubic feet per calendar year)
 - iv. Highest amount of natural gas used (therms or cubic feet in any one month)
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints relating to air quality received by permittee during the year.
 - d. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - e. List major maintenance performed on pollution control equipment.
- 7.3 Initial Startup Notice** The permittee must notify LRAPA in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.

- 7.4 Notice of Change of Ownership or Company Name** The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 7.5 Construction or Modification Notices** The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with LRAPA 34-010 through 34-038 before:
- a. Constructing or installing any new source of air contaminant emissions, including air pollution control equipment;
 - b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;
 - c. Making any physical change which increases emissions; or
 - d. Changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation that result in increased emissions.
- 7.6 Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 8.2.

8.0 ADMINISTRATIVE REQUIREMENTS

- 8.1 Reassignment to the General Permit** The permittee must complete an application for reassignment to this permit within 30 days prior to the expiration date of the General ACDP or within 30 days after the permit is reissued. LRAPA will notify the permittee when the permit is reissued.
- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is reissued and the source is reassigned to the permit.
 - b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until LRAPA takes final action on the Simple or Standard ACDP application.
 - c. If a complete application for reassignment to the General ACDP or Simple or Standard ACDP is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

8.2 LRAPA Address and Contact Number All reports, notices, and applications should be directed to the LRAPA office. The LRAPA address and contact number is as follows:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: 541-736-1056

8.3 LRAPA Website Information about air quality permits and LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org.

9.0 FEES

9.1 Annual Compliance Fee The Annual Compliance Determination Fee specified in LRAPA 37-0090, Table 2, Part 2.c for a Class One General ACDP (roasting 30 or more tons per year) is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

9.2 Change of Ownership or Company Name Fee The non-technical permit modification fee specified in LRAPA 37-0090, Table 2, Part 3.a is due with an application for changing the ownership or the name of the company of a source assigned to this permit.

9.3 Where to Submit Fees Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

10.0 GENERAL CONDITIONS AND DISCLAIMERS

- 10.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 10.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.3 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 10.4 LRAPA Access** The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 10.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.6 Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 10.7 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 10.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 10.9 Termination, Revocation, or Modification** LRAPA may modify or revoke this permit pursuant to LRAPA Title 37, Section 37-0060(3), (4) and 37-0082.

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
ASTM	American Society for Testing and Materials	O ₂	oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
calendar year	The 12-month period beginning January 1st and ending December 31st	ORS	Oregon Revised Statutes
CFR	Code of Federal Regulations	O&M	operation and maintenance
CO	carbon monoxide	Pb	lead
DEQ	Oregon Department of Environmental Quality	PCD	pollution control device
dscf	dry standard cubic foot	PM	particulate matter
EPA	US Environmental Protection Agency	PM ₁₀	particulate matter less than 10 microns in size
FCAA	Federal Clean Air Act	ppm	part per million
gal	gallon(s)	PSD	Prevention of Significant Deterioration
gr/dscf	grains per dry standard cubic foot	PSEL	Plant Site Emission Limit
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	PTE	Potential to Emit
ID	identification number	RACT	Reasonably Available Control Technology
I&M	inspection and maintenance	scf	standard cubic foot
lb	pound(s)	SER	Significant Emission Rate
MMBtu	million British thermal units	SIC	Standard Industrial Code
NA	not applicable	SIP	State Implementation Plan
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SO ₂	sulfur dioxide
NO _x	nitrogen oxides	Special Control Area	as defined in LRAPA Title 29
NSPS	New Source Performance Standard	VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

AQGP-016, coffee roasters

Lane Regional Air Protection Agency



GENERAL AIR CONTAMINANT DISCHARGE PERMIT ASSESSMENT REPORT

COFFEE ROASTERS

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from facilities that roast 30 or more tons of raw (green) coffee beans per year.
2. The facilities assigned to this General Permit have no other air pollution sources which require regulation beyond that specified in this permit, or have other pollution sources that also qualify for General Permits. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.

ASSESSMENT OF EMISSIONS

3. Facilities assigned to this General Permit are sources of PM, PM₁₀, PM_{2.5}, SO₂, CO, NO_x, and VOC emissions.
4. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in the definitions of Significant Emission Rates in LRAPA Title 12.

SPECIFIC AIR PROGRAM APPLICABILITY

5. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements to control of fugitive dust and odors, and particulate matter standards in LRAPA Title 32. The permit contains requirements and limitations to ensure compliance with these standards.

COMPLIANCE ASSURANCE

6. Facilities are required to maintain records associated with operating parameters, excess emissions, and continuous monitoring data such as after burner temperature, if this type of odor abatement technique is employed. These items are reported to LRAPA annually.

REVOCAION OF ASSIGNMENT

7. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

PUBLIC NOTICE

8. General Air Contaminant Discharge Permits are part of the LRAPA State Implementation Plan. As part of the permitting process, the public will be provided at least 30 days to submit written comments. LRAPA will review any comments and may modify the permits in response to the comments.

AQGP-016r, coffee roasters