



Department of Environmental Quality  
Air Quality Program

**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 coffee roasting facilities that roast 30 or more tons of coffee per year.
2. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities defined by OAR Chapter 340 Division 200. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.
3. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with OAR 340-216-0062, otherwise the facility must obtain a Simple or Standard Permit. A facility requesting to be assigned to a General Permit Attachment, in accordance with OAR 340-216-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

4. Facilities assigned to this General Permit are sources of PM and PM<sub>10</sub>, SO<sub>2</sub>, CO, NO<sub>x</sub>, and VOC emissions.
5. Potential nuisances originating from this type of operation could include fugitive dust associated with material handling. The permit includes requirements to minimize fugitive dust emissions. Nuisance odors may also originate from these facilities; the permit includes requirements to minimize nuisance odors.
6. DEQ has assessed the level of emissions from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources and compliant with applicable emissions limits. However, facilities assigned to this permit will be required to track and report various data elements to demonstrate compliance. If DEQ determines that facilities assigned to this permit emit above permitted emissions limits, the permittee will be required to obtain a different permit.

#### SPECIFIC AIR PROGRAM APPLICABILITY

7. The types of facilities regulated by this General permit are not subject to federal standards.
8. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors), and particulate matter standards in OAR Chapter 340, Divisions 208 and 226. The permit contains requirements and limitations to ensure compliance with these standards.
9. This General Permit was reviewed by Cleaner Air Oregon staff using a Level 1 Risk Assessment, the most conservative and simplest risk assessment. In order to stay below risk levels that would require installation of controls, DEQ has included a permit condition that limits the permittee to roast no more than 7,087 green tons of product in any year. If a coffee roaster cannot accept that limit on roasting, the owner or operator can perform a Level 2 Risk assessment and obtain a Simple Air Contaminant Discharge Permit instead of the General Permit AQGP-016.

#### COMPLIANCE ASSURANCE

10. Permittees are required to maintain records associated with production, throughput, fuel use, pollution control devices, continuous monitoring data (after burner temperature, if this type of odor abatement technique is employed), operation and maintenance, operating parameters, complaints, and excess emissions. Many of these items are reported to DEQ annually.
11. DEQ staff members review annual report submittals and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

#### REVOCAION OF ASSIGNMENT

12. 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

13. General Air Contaminant Discharge Permits are authorized by Oregon Administrative Rules and are part of the State Implementation Plan. As part of the General ACDP issuance process under OAR chapter 340 division 209, the public was provided at least 30 days to submit written comments. DEQ reviewed all comments received within the comment period and modified the permit.

#### COMMENTS AND RESPONSES

Comment	Correct typographical errors, incorrect cross references, and update phone numbers for DEQ offices.
Response	DEQ made the suggested changes.

Comment	Condition 1.1(c) - this appears to be new language added since last permit (as indicated by the red line version) - capping production at no more than 7,087 tons per year. Why? Doing some quick math, that production number (with no controls) still would be below the permit's allowable PSEL? Why a cap? What happens if a coffee roaster has more production than 7,087 tons per year, but is under their PSEL?
Response	<p>All new and renewed permits are required to have an evaluation of risk from toxic air contaminants under the Cleaner Air Oregon rules adopted in 2018. For small businesses, DEQ evaluates risk using a Level 1 Screening Risk Assessment. Level 1 uses conservative assumptions to evaluate risk because in many cases, DEQ does not have the detailed information to perform a higher level of risk assessment.</p> <p>Based on DEQ's Level 1 risk assessment, coffee roasters must limit production to no more than 7,087 green tons of product in any year to keep risk below acceptable risk levels. If a coffee roaster cannot comply with the 7,087 green tons production limit, they can perform a Level 2 risk assessment or provide DEQ with information to do so.</p> <p>No change to the permit has been made.</p>
Comment	Condition 3.2 - In addition to the language already established within 3.2(a), it is suggested to add potential language such as 'or as per manufacturer's recommendation or as allowed and approved by DEQ'. Sometimes equipment cannot achieve such dictated temperatures, still achieve destruction of pollutants, and cause no nuisances. There should be some reasonable flexibility built into this permit for such cases.
Response	<p>1,400° is the temperature requirement for the afterburner to achieve a destruction efficiency of 95%. If a permittee proposes a different afterburner temperature, a source test must be done to verify destruction efficiency of 95%. That permittee could no longer be permitted on AQGP-016 and must obtain a Simple Air Contaminant Discharge Permit.</p> <p>No change to the permit has been made.</p>