



Southwest Clean Air Agency

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September 27, 2013

Mr. Ken Franklin
KCL Enterprises
4107 NW Fruit Valley Road
Vancouver, WA 98660

Subject: Notification of Coffee Roaster Operation – (Lewis and Clark Coffee Company - SWCAA ID 2403)

Dear Mr. Franklin:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on August 12, 2013 for operation of a coffee roaster at 4107 NW Fruit Valley Road, Vancouver, WA (SWCAA ID 2403). For administrative and tracking purposes SWCAA has assigned tracking number SUN-051 to this notification. This notification was filed in accordance with SWCAA 400-072 and applies to the installation of one coffee roaster. The coffee roaster was identified as:

- (1) Diedrich Manufacturing Company natural gas fired roaster with a roasting capacity of 30 pounds per batch and a total heat input capacity (roaster and afterburner) of 0.863 MMBtu/hr. The unit utilizes a Diedrich Manufacturing Company model 12 afterburner.

SWCAA has completed a review of your notification and the associated support information and has determined that the notification meets the requirements of SWCAA 400-072(2). Once installed, affected equipment must maintain compliance with the requirements of SWCAA 400-072(4)(a) "**Coffee roasters**". A copy of the relevant SWCAA 400-072 section is attached for your information.

Be advised that emission units installed pursuant to SWCAA 400-072 are subject to source registration and periodic inspection. Registration fees for this equipment will be invoiced consistent with SWCAA 400-100.

If you need further assistance or have any questions regarding these matters, please contact me at (360) 574-3058 extension 130.

Sincerely,

Paul T. Mairose
Chief Engineer



SWCAA 400-072 Emission Standards for Selected Small Source Categories

[Statutory Authority: Chapter 70.94.141 RCW. Original adoption 09-21-056 filed 10/15/09, effective 11/15/09.]

(4) Source categories.

(a) Coffee roasters.

- (i) **Applicability.** The provisions of this section apply to batch configuration coffee roasters with a capacity of 10 pounds or greater, but less than 100 pounds of green coffee beans per batch.
- (ii) **Emission limits and standards.**
 - (A) Visible emissions from the coffee roaster exhaust stack shall not exceed five percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (SWCAA 400, Appendix A).
 - (B) Operations that cause or contribute to odors that could unreasonably interfere with any other property owner's use and enjoyment of their property shall use recognized good practice and procedures to reduce those odors to a reasonable minimum, consistent with the requirements of SWCAA 400-040(4).
- (iii) **General requirements.**
 - (A) Each coffee roaster shall be equipped with an afterburner designed for a minimum residence time of 0.5 seconds, and capable of maintaining an operating temperature of not less than 1,200°F.
 - (B) Each coffee roaster shall have an operable temperature gauge capable of monitoring afterburner operating temperature on a continual basis.
 - (C) Each coffee roaster shall be exhausted to the afterburner whenever smoke or odors are generated by roasting and cooling activities.
 - (D) Afterburners shall be operated whenever the associated coffee roaster is in operation. The afterburner shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, the afterburner shall be operated in a manner that minimizes emissions.
 - (E) The exhaust point for each coffee roaster shall be a minimum of 200 feet from the nearest residential structure.
 - (F) Each coffee roaster and afterburner shall be fired on natural gas only.
 - (G) Afterburner exhaust shall be discharged vertically at least four feet above the roof peak of the building containing the afterburner, and at a point higher than surrounding buildings. Any device that obstructs or prevents vertical discharge is prohibited.
- (iv) **Monitoring and recordkeeping requirements.** The information listed below shall be recorded at the specified intervals, and maintained in a readily accessible form for a minimum of 3 years. With the exception of data logged by a computerized data acquisition system, each required record shall include the date and the name of the person making the record entry.
 - (A) Afterburner operating temperature shall be recorded weekly;
 - (B) Quantity of coffee roasted shall be recorded weekly;
 - (C) Upset conditions that cause excess emissions shall be recorded for each occurrence; and
 - (D) All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action shall be recorded for each occurrence.

(v) **Testing requirements.** None.

(vi) **Reporting requirements.**

- (A) All air quality related complaints, including odor complaints, received by the owner or operator shall be reported to SWCAA within 3 business days of receipt.
- (B) The owner or operator of an affected coffee roaster shall report the following information to the Agency no later than March 15th for the preceding calendar year:
 - (I) Quantity of natural gas consumed by the roaster and afterburner;
 - (II) Quantity of coffee roasted; and
 - (III) Air emissions of criteria air pollutants, VOCs, and toxic air pollutants (TAPs).