



April 9, 2025

Brandon Pasa
Hidden River Roasters, LLC
536 NE 5th Ave.
Camas, WA 98607

Subject: Final Approval for Installation of Mill City Coffee Roaster with Catalytic Oxidizer

Dear Brandon Pasa:

A final determination to issue Air Discharge Permit (ADP) 25-3699 has been completed for ADP application CL-3295 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP application CL-3295 was published in the permit section of SWCAA's website on March 20, 2025. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 25-3699 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP 25-3699 may be appealed directly to the Pollution Control Hearings Board (PCHB) within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,

Uri Papish
Executive Director

UP:cl

Enclosure: Technical Support Document and ADP 25-3699





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
25-3699**

Issued: April 9, 2025

HIDDEN RIVER ROASTERS
39813 SE 37th St., Washougal, WA 98671

SWCAA ID – 2693



REVIEWED BY:

Clinton H. Lamoreaux

Clinton Lamoreaux, Chief Engineer

APPROVED BY:

Uri Papish

Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Mill City Roasters Coffee Roaster and cooling tray (24 kg / batch)	Clean Stream catalytic oxidizer on roaster, filtration on cooling tray

2. Permit Requirements

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the requirement is contained in the middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

Air Discharge Permit 20-3422 is superseded in its entirety by this Air Discharge Permit.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.										
1.	Emissions from the Mill City Coffee Roaster / catalytic oxidizer exhaust stacks must not exceed: <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>0.14 tons per year</td> </tr> <tr> <td>Carbon Monoxide</td> <td>0.13 tons per year</td> </tr> <tr> <td>PM₁₀</td> <td>0.041 tons per year</td> </tr> <tr> <td>PM_{2.5}</td> <td>0.041 tons per year</td> </tr> </tbody> </table> Annual emissions must be calculated in accordance with Section 6 of the Technical Support Document for this Permit.	<u>Pollutant</u>	<u>Emission Limit</u>	Nitrogen Oxides	0.14 tons per year	Carbon Monoxide	0.13 tons per year	PM ₁₀	0.041 tons per year	PM _{2.5}	0.041 tons per year	1
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2.	Visible emissions from the Mill City Coffee Roaster and cooling tray must not exceed zero percent opacity for more than three minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1										

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/Activity ID No.
3.	Odors from the facility must not unreasonably interfere with any other property owner's use and enjoyment of their property. Recognized good practice and procedures must be used to reduce odors to a reasonable minimum.	1

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
4.	The cooling tray exhaust must be filtered as necessary to prevent the generation of excess opacity and nuisance odor. If excess opacity or nuisance odor from the cooling tray is documented by SWCAA, MERV 14 filtration or better must be installed within 30 days on the cooling tray discharge. Installation of additional filtration does not shield the Permittee from the requirement to comply with the opacity limit in Condition 2 and the odor requirement of Condition 3.	1
5.	The catalytic oxidizer temperature must achieve at least 600 °F by the time the coffee beans reach a temperature of 270 °F and must be operated between 600 °F and 1,000 °F until the beans drop into the cooling tray. Furthermore, the catalytic oxidizer must be operated in a manner that minimizes emissions.	1
6.	Catalytic oxidizer maintenance and replacement must be conducted as recommended by the manufacturer and as necessary to maintain compliance with the terms and conditions of this Permit. A copy of the relevant catalytic oxidizer maintenance manual must be maintained on-site for reference and review by operators and SWCAA representatives.	1
7.	If visible emissions are observed from the roaster / catalytic oxidizer exhaust stack, the Permittee must take corrective action as soon as practical but no later than 24 hours after the presence of visible emissions is identified. Visible emissions monitoring must be repeated within 24 hours after completion of any corrective action to confirm that the corrective action has been effective. Corrective action must be pursued until visible emissions are eliminated using the "see / no see" method described in Condition 14, or until compliance can be confirmed with the visible emissions limit using SWCAA Method 9. Initiation of corrective action does not shield the permittee from enforcement actions by SWCAA.	1
8.	The roaster / catalytic oxidizer exhaust must be discharged vertically above the roof level of the building containing the coffee roaster and at a point higher than surrounding buildings and/or terrain. Any device that obstructs or prevents vertical discharge is prohibited.	1
9.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	Facility-wide
10.	Each pollution control device must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions.	1

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
11.	The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ul style="list-style-type: none"> (a) The catalytic oxidizer operating temperature must be recorded at least once each week while in operation; (b) The total amount of coffee roasted must be recorded at least once each week; (c) The results of required visible emissions monitoring must be recorded for each occurrence. See Appendix A for example log sheet; (d) Maintenance activities that may affect emissions (for example catalyst cleaning or replacement) must be recorded for each occurrence; (e) Upset conditions that cause excess emissions must be recorded for each occurrence; and (f) All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence. 	1
12.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry.	Facility-wide
13.	All records required by this Permit must be kept on site for a minimum period of no less than three years and must be available for inspection by SWCAA representatives.	Facility-wide

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
14.	At least once every two calendar months, the Permittee must observe the emissions from the oxidizer stack while roasting a batch of the darkest coffee processed in the two month period. The observations must consist of observing the stack exhaust for a period of at least 5 minutes for the presence or absence of visible emissions at a point in the plume where condensed water vapor is not present (see / no see). The observation must be made from a position where the sun is at the observer's back. The results of the observation must be recorded and maintained available for inspection by SWCAA representatives.	1

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
15.	The permittee must notify SWCAA in writing within ten (10) days after completing initial startup of the facility. This will allow proper inspections and observations to be conducted for the new equipment.	1

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
16.	Excess emissions must be reported to SWCAA as follows: <ul style="list-style-type: none"> (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	Facility-wide
17.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide
21.	All air quality related complaints received by the Permittee regarding activities controlled by the Permittee must be reported to SWCAA within three days of receipt.	Facility-wide
18.	The following emission-related information must be reported to SWCAA by March 15 th for the previous calendar year: <ul style="list-style-type: none"> (a) The total amount of fuel consumed by the roaster and catalytic oxidation system; (b) The total amount of coffee beans roasted; and (c) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	Facility-wide

3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.

Req. No.	General Provisions
F.	This ADP does not supersede requirements of other agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to ensure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.
K.	For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.

SOUTHWEST CLEAN AIR AGENCY

**COFFEE ROASTER / CATALYTIC OXIDIZER
VISUAL EMISSIONS OBSERVATION RECORD**

Note: The date, start time, and stop time must be recorded for each observation.

DATE	START TIME	STOP TIME	Visible Emissions (Yes/No) ¹

¹ If SWCAA Method 9 is conducted, include separate Method 9 log sheet