



air pollution control district  
SANTA BARBARA COUNTY

January 31, 2020

Nereyda Harmon  
Santa Barbara County  
Planning and Development  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: Air Pollution Control District Suggested Conditions on Orbiter Inc./Saga Inc. – Cannabis Cultivation, 19DVP-00000-00017**

Dear Nereyda Harmon:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of the use of approximately 172,097 square feet (SF) of an existing greenhouse for cannabis cultivation and the use of approximately 13,598 SF of the existing greenhouse for drying, trimming and packaging. The Odor Abatement Plan proposes a Byers vapor-phase odor mitigation system with Ecosorb CNB 107. Site is served by an existing water well and municipal power. No grading is proposed for the site. The subject property, a 6.42-acre parcel zoned AG-I-10 and identified in the Assessor Parcel Map Book as APN 004-003-005, is located at 4555 Foothill Road in the unincorporated Carpinteria area.

The District has prepared an *Advisory on Air Quality and Cannabis Operations* (available at [www.ourair.org/land-use](http://www.ourair.org/land-use)) that provides local agencies and cannabis operators guidance regarding the air quality aspects of this industry. The advisory discusses the District's regulatory limitations on odors from agricultural operations, recommendations for odor abatement, and cannabis-related operations that may require a District permit. This advisory should be carefully reviewed by the County and cannabis operator.

Air Pollution Control District staff has the following specific **advisories and recommendations** related to the proposed project:

1. Post-harvest cannabis operations may be required to obtain District permits pursuant to Rule 201 (*Permits Required*) due to the issuance of air contaminants. Examples of processes and/or equipment used in cannabis-related operations that may require a District permit include:
  - Boilers and hot water heaters,
  - Emergency standby generators,
  - Emission control equipment,
  - Incinerators,
  - Cannabis extraction manufacturing including use of volatile compounds or solvents, and
  - Other internal or external combustion equipment.

Please contact the District Engineering Division Manager, David Harris, to determine applicable permitting requirements at (805) 961-8824 or [HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org).

2. Indoor and mixed-light cultivation (e.g., greenhouses) located near residential, commercial and other sensitive receptors should abate cannabis odors through the use of containment, ventilation, filters, control and/or deodorizing systems. Outdoor cultivation and growing operations also create strong cannabis odors, and the District recommends that such operations not be located near public locations such as residences, commercial buildings, or other sensitive receptors. The District encourages the use of buffer zones to allow for maximum odor dispersion, as well as other odor abatement strategies, to avoid nuisance odors.
3. The District recommends the use of odor abatement measures and proper design of odor abatement systems by a professional engineer and/or certified industrial hygienist. The odor abatement system should be designed to ensure that cannabis odors are not detected by nearby residential areas or sensitive receptors.
4. Any chemical used for deodorizing systems should not cause adverse impacts to the community. Low-VOC (volatile organic compound) or no-VOC compounds are recommended, as well as compounds that do not contain toxic air contaminants (TACs) as identified by the State of California. The comprehensive list of TACs can be found at [www.arb.ca.gov/toxics/healthval/contable.pdf](http://www.arb.ca.gov/toxics/healthval/contable.pdf). If odor control systems use chemicals that contain TACs, the County should assess the potential for health risk by performing a refined Health Risk Assessment.
5. The District recommends that boilers, water heaters, and process heaters rated between 2 million to 5 million BTU/hr comply with the emission limits and certification requirements of District Rule 361. Please see [www.ourair.org/wp-content/uploads/Rule361.pdf](http://www.ourair.org/wp-content/uploads/Rule361.pdf) for more information. Units rated above 5 million BTU/hr are recommended to comply with the emission limits and certification requirements of District Rule 342. Please see [www.ourair.org/wp-content/uploads/rule342.pdf](http://www.ourair.org/wp-content/uploads/rule342.pdf) for more information.

Air Pollution Control District staff offers the following suggested **conditions**:

1. Stationary and portable diesel-fired emergency standby generator engines rated 50 bhp or greater must be either registered or permitted by the District. Please refer to the District's website at [www.ourair.org/ag-diesel-registration](http://www.ourair.org/ag-diesel-registration) and [www.ourair.org/dice-atcm](http://www.ourair.org/dice-atcm) for additional information. These engines must also comply with the state Airborne Toxic Control Measures for Stationary Compression Ignition Engines. Please see [www.ourair.org/wp-content/uploads/finalreg2011.pdf](http://www.ourair.org/wp-content/uploads/finalreg2011.pdf) for more information.
2. Natural gas-fired fan-type central furnaces with a rated heat input capacity of less than 175,000 Btu/hr and water heaters rated below 75,000 Btu/hr must comply with the emission limits and certification requirements of District Rule 352. Please see [www.ourair.org/wp-content/uploads/rule352.pdf](http://www.ourair.org/wp-content/uploads/rule352.pdf) for more information.
3. Boilers, water heaters, and process heaters (rated between 75,000 and 2.0 million Btu/hr) must comply with the emission limits and certification requirements of District Rule 360. Note: Units fired on fuel(s) other than natural gas still need to be certified under Rule 360. Please see [www.ourair.org/wp-content/uploads/rule360.pdf](http://www.ourair.org/wp-content/uploads/rule360.pdf) for more information.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8873 or via email at [HoD@sbcapcd.org](mailto:HoD@sbcapcd.org).

Sincerely,



Desmond Ho  
Air Quality Specialist  
Planning Division

cc: Jay Higgins, H&H Environmental  
David Harris, Manager, District Engineering Division [email only]  
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