

February 21, 2020

Melanie Jackson
Santa Barbara County
Planning and Development
123 E. Anapamu St.
Santa Barbara, CA 93101

Re: Santa Barbara County Air Pollution Control District Review of Application Incompleteness Submittal for Santa Rita Holdings – Outdoor Cannabis Cultivation, 19CUP-00000-00018

Dear Melanie Jackson:

The Santa Barbara County Air Pollution Control District (District) has reviewed the applicant's *"Incomplete Letter Response for Santa Rita Holdings – Outdoor Cannabis Cultivation, 19CUP-00000-00018,"* received on January 30th, 2020. The applicant has addressed items detailed in our incompleteness letter of May 3rd, 2019. However, the District requires more information about the proposed project to determine applicability of District suggested conditions and permit requirements.

Please address the following items:

1. For the proposed natural gas-powered emergency generator, please provide:
 - a. The number of hours the engine is expected to operate annually in a reasonable worst-case scenario (including hours for emergency use and testing and maintenance).
 - b. A description of the specific operations that would be served by the emergency generator.
2. Please provide the manufacturer specifications for the proposed ionization control device and confirm if the device generates ozone. Please see the advisory below regarding use of ozone generators.

Once the necessary information is provided and reviewed for completeness, the District will submit a departmental condition letter for the project. Please ensure that all applicable District conditions are included with the Conditions of Approval for the project.

District staff has the following initial advisories for the project:

1. **Use of Ozone Generators:** The District does not recommend the use of ozone generators or photocatalytic oxidation air cleaners (also known as PCO air cleaners or hydroxyl generators) for odor mitigation^{1,2}, regardless of whether the ozone generator is located in an unoccupied space. Santa Barbara County is currently designated nonattainment for the state ambient air quality standard for ozone; the proposed generators could produce ozone levels that are well above the

¹ California Air Resources Board, *Hazardous Ozone-Generating 'Air Purifiers'*, www.arb.ca.gov/research/indoor/ozone.htm

² Environmental Protection Agency, www.epa.gov/sites/production/files/2018-07/documents/residential_air_cleaners_-_a_technical_summary_3rd_edition.pdf

state standard. Also, it is important that any chemical used for deodorizing systems 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 here: www.arb.ca.gov/toxics/id/taclist.htm.

2. **Odor Abatement Plan:** The provided “Santa Rita Holdings Odor Mitigation Plan” is missing information as required by the County’s Land Use Development Code. Although it is not in the District’s jurisdiction to regulate odors from cultivation-only cannabis operations, the District recommends that the County require all portions of the Odor Abatement Plan as laid out in the County’s *Land Use Development Code, 35.42-075 Cannabis Regulations, Section C.6.* including:
 - a. A floor plan, specifying locations of odor-emitting activity(ies) and emissions.
 - b. A description of the specific odor-emitting activity(ies) that will occur.
 - c. A description of the phases (e.g., frequency and length of each phase) of odor-emitting activity(ies).
 - d. Provide design drawings and technical brochures and/or vendor data for the odor control system(s) and building designs.
 - e. Designation of an individual (local contact) who is responsible for responding to odor complaints.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8878 or via email at WaddingtonE@sbcapcd.org.

Sincerely,



Emily Waddington,
Air Quality Specialist
Planning Division

cc: Jason Hillenbrand [email only]
David Harris, Manager, District Engineering Division [email only]
Planning Chron File