



air pollution control district
SANTA BARBARA COUNTY

March 9, 2021

Greg Stones
City of Lompoc
Planning Division
100 Civic Center Plaza
Lompoc, CA 93436

Re: Air Pollution Control District Initial Feedback for Mustang Lompoc Investors LLC Cannabis Growing and Processing Facility, DR 20-06

Dear Greg Stones:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of a development plan for the construction of a cannabis cultivation, harvesting, processing, and manufacturing facility in a pre-engineered enclosed metal building on vacant property. The project includes 8,617 square feet (SF) of office area, 38,545 SF of growing area, and 20,964 SF of processing area. An extraction room with use of volatile and non-volatile solvents is proposed. The odor abatement plan consists of the use of recirculation ventilation systems with the CosaTron technology aggregation system and air filters within the building. Points of exhaust will be treated with FogCo vapor phase technology using Odor Armor 420 solution. There will be 61 parking spaces and a loading zone. The facility will not be open or sell to the public. An emergency back-up generator is also proposed (details not provided). A specific tenant has not been identified at this time. The subject property, three parcels totaling 3.01 acres, are zoned Business Park, and identified in the Assessor Parcel Map Book as APNs 093-450-018, -019, and -020. The project is located at 1501 North O Street, 801 Cordoba Avenue, and 805 Cordoba Avenue in the City of Lompoc.

District Authority to Construct (ATC) and Permit to Operate (PTO) permits will be required for the proposed project. Therefore, the District is a responsible agency under the California Environmental Quality Act (CEQA) for this project and will rely on the CEQA environmental document when issuing District permits. The City's environmental analysis of the project pursuant to CEQA should include the air pollutant emissions for all proposed operations and equipment, and adequately assess the project's potential impacts to air quality (including health risk impacts) to avoid additional CEQA documentation related to District permit issuance. A specific tenant has not been identified for the proposed cannabis facility; however, the City intends to prepare a CEQA document for the facility that can be relied on for the use(s) proposed by future tenants. In the event that the impacts from a future use are insufficiently evaluated in the proposed Development Plan's CEQA document, we expect the City will conduct appropriate environmental review in consultation with the District. District staff will work closely with your agency's consultants and staff to ensure that the CEQA document(s) adequately addresses air quality and greenhouse gas impacts.

Information Requests

Please provide the following information to facilitate the District's evaluation of potential air quality impacts and applicability of District permit requirements, prohibitory rules, and other regulatory programs:

Aeron Arlin Genet, Air Pollution Control Officer

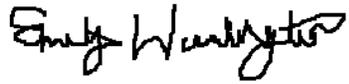
1. Specify the anticipated solvent types, ROC content, and maximum amounts of solvent usage on a daily and annual basis (gallons per day and gallons per year) for the manufacturing operations (including but not limited to solvents used for extraction, winterization, and wipe cleaning).
2. Will the facility be adding carbon dioxide to the growing areas? If so, please specify the amount of carbon dioxide that will be utilized on an annual basis (tons per year).
3. For the proposed emergency generator please provide the fuel type, size of the equipment (horsepower), make and model, model year, manufacture specification sheet, and emission specification of the equipment (if available).
4. Please describe any additional combustion equipment that will be installed and/or operated onsite to support the proposed project. This could include heaters, boilers, and engines to supply power to equipment or operations (such as power to structures, water pumps, electric power generators). For each piece of equipment, provide the sizing such as Btu rating or horsepower, fuel type, anticipated hours of fuel usage and amount of fuel usage, and manufacturer specifications.
5. Please provide all chemical constituents contained in the Odor Armor 420 solution used in the vapor phase system, the fraction by weight of all of the chemicals contained in such compounds, and proposed usage amounts for all such compounds per year. Please note that the District has a procedure in place for handling confidential information for cases where the chemical makeup of odor control products is proprietary information. The District procedure for handling confidential information can be found here: www.ourair.org/wp-content/uploads/6100-020-1.pdf.
6. Prepare an air quality and greenhouse gas technical report for the project. The report should include the following:
 - a. Quantification of criteria pollutants and greenhouse gas emissions from all project phases (construction and operational) and from all potential emission sources associated with the proposed project, including but not limited to, emissions from mobile sources (employee vehicles and various delivery trucks, based on a traffic study or trip generation report), permitted and unpermitted combustion equipment (heaters, emergency generator etc.), reactive organic compounds (ROCs) from manufacturing operations, greenhouse gas emissions from the addition of carbon dioxide for cultivation (if applicable), and indirect greenhouse gas emissions from electricity use, water use, and waste disposal. Note that the emission estimates for equipment/operations that require a District permit should be based on the emission factors and usage rates that will be used in District permitting of the equipment, which will be the applicable Rule emission limits for the proposed fuel type.
 - b. A summary table that compares the project's emission sources (stationary, mobile, area, as appropriate) to the City's chosen CEQA significance thresholds. If impacts from the proposed project are anticipated to exceed the chosen air quality and/or greenhouse gas thresholds, the applicant should propose project design changes and/or mitigation measures that will avoid, reduce, or mitigate those impacts.

District Advisories

- 1. Project Description:** The District cannot permit a level of activity or emissions different than what has been approved and evaluated by the lead agency (and/or the land use authority). Therefore, the project description provided in the District permit application must be generally consistent with the project description conditioned in the land use permit. The District permit will condition any emissions limits presented in the land use approval. We advise the applicant to ensure that the usage amounts of any solvents are accurate in the project description submitted to the City, as the District will limit the applicant to these amounts to ensure that ROC emissions remain consistent with the land use approval.
- 2. Best Available Control Technology:** During completeness review of the District permit application, the District will evaluate the emissions from the proposed project to determine which New Source Review requirements will apply. At this time, the District does not have sufficient information regarding solvent usage of the manufacturing operation to determine if the proposed project will trigger the District's threshold for requiring implementation of Best Available Control Technology (BACT). **If the project's potential to emit triggers BACT requirements, the applicant may be required to make substantial changes to their operation in order to meet District rule requirements. Changes to the project description may result in the need to obtain a revised land use permit from the City and appropriate CEQA documentation.** The applicant should refer to District Rule 802 at www.ourair.org/wp-content/uploads/rule802.pdf for more information on New Source Review and BACT requirements.
- 3. Health Risk:** If a District permit is required for any project equipment or operations and the project has the potential to emit toxic or hazardous air pollutants, as part of District permit issuance, the project may be required to prepare a Health Risk Assessment (HRA) to determine the potential level of risk associated with proposed operations. **If an HRA is required, we recommend it be performed up front during the land use review process to ensure that project-related equipment will not result in a significant impact. The results of the HRA should be incorporated into the CEQA document for the project.** See District *Modeling Guidelines for Health Risk Assessments*, Form-15i, available at www.ourair.org/permit-applications, for more information on conducting health risk assessments.
- 4. Vapor Phase Odor Control:** A health risk assessment should be performed if a proposed vapor phase odor control system utilizes a chemical listed on the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* (see: www.arb.ca.gov/toxics/healthval/healthval.htm and www.arb.ca.gov/toxics/healthval/contable.pdf).
- 5. Permit Timing:** The District permit process can take several months. The applicant is encouraged to submit their Authority to Construct permit application to the District as soon as possible, see www.ourair.org/cannabis to download the necessary permit application(s). Please note that the District cannot deem an application complete until the lead agency permit has been deemed complete. Additionally, the District cannot issue its permit until the lead agency permit and CEQA findings have been approved.

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,

A handwritten signature in black ink that reads "Emily Waddington". The signature is written in a cursive, flowing style.

Emily Waddington
Air Quality Specialist
Planning Division

cc: Gary Madjedi, Architect
David Harris, Manager, District Engineering Division [email only]
William Sarraf, Supervisor, District Engineering Division [email only]
Planning Chron File