



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

March 15, 2019

Brianna Wiley
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

Re: APCD Revised Incompleteness Items for Motivation Management Group LLC – Cannabis Operations, 18CUP-00000-00031

Dear Ms. Wiley:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of cannabis cultivation, manufacturing, a nursery, and a distribution facility. The project includes erecting two new greenhouses which along with an existing greenhouse totals 14,776 square feet of cannabis cultivation. Cannabis processing, manufacturing (volatile and nonvolatile), and distribution would take place in an existing 1,927 square foot building. An Odor Abatement Plan detailing the project's odor control techniques and equipment has been provided. The business is expected to employ about 10 people and parking would be on a gravel lot. No grading is required. The site is currently served by the Vista Hills Mutual Water Company and no new water wells are proposed onsite. The subject property, an 8.60-acre parcel zoned AG-I and identified in the Assessor Parcel Map Book as APN 099-160-050, is located at 5375 Campbell Road in the unincorporated Lompoc area.

APCD finds the application to be incomplete and requires more information about the proposed project to determine potential air quality impacts, appropriate permit conditions for the proposed land use, and applicability of APCD permit requirements, prohibitory rules, and other regulatory programs such as the state's Distributed Generation Program.

Please provide responses to the following items:

1. It appears that aspects of the proposed operation may be subject to APCD permit requirements. Please compile the information necessary to address the items below, and contact APCD Engineering Division to determine applicable permitting requirements. Contact information: David Harris, Engineering Division Supervisor, (805) 961-8824, HarrisD@sbcapcd.org.
 - a. Please provide the capacity of the solvent vessel(s) in gallons, the types of solvents that will be used, and the amount of makeup solvent expected to be purchased each year due to solvent fugitive losses from the cannabis manufacturing equipment and operations.
 - b. Please describe any existing or proposed combustion equipment that will be installed and/or operated onsite to support the proposed project. This could include large water heaters, boilers, and engines to supply power to equipment, water well drilling,

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facilities, or operations (such as power to structures, water pumps, electric power generators). Please note that the County of Santa Barbara Cannabis Land Use Ordinance prohibits the use of generators for cultivation and manufacturing, except for temporary use in the event of a power outage or emergency. **For all existing and proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, and manufacturer specifications.**

2. For the proposed Fogco® vapor phase odor control system, please provide all chemical constituents contained in all the compounds/products 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 APCD has a procedure in place for handling confidential information for cases where the chemical makeup of odor control products is proprietary information. The APCD procedure for handling confidential information can be found here: www.ourair.org/wp-content/uploads/6100-020-1.pdf.
3. A health risk assessment should be performed if the proposed Fogco® vapor phase odor control system utilizes a chemical listed on the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* (see: <https://www.arb.ca.gov/toxics/healthval/healthval.htm> and <https://www.arb.ca.gov/toxics/healthval/contable.pdf>).
4. An air quality and greenhouse gas analysis should be prepared for the project. The analysis should quantify emissions of all air pollutants from all potential emission sources associated with the proposed project, including but not limited to, emissions from mobile sources (vehicle exhaust and fugitive dust from vehicle travel on unpaved roads), permitted and unpermitted combustion equipment, indirect greenhouse gas emissions from electricity use, water use, waste disposal, etc. The air quality and greenhouse gas impact analysis for mobile source emissions should be based on project-specific information and supported by a traffic study whenever possible.
5. A traffic study should be prepared for the proposed project. The trip generation rates detailed in the traffic study, including average daily trips (ADT), should be used to estimate project-specific vehicle emissions.

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

APCD staff has the following initial advisories on the project:

1. **CEQA Requirements/Environmental Analysis:** If the proposed project involves the installation and operation of equipment that would require an air district permit (e.g., for a boiler, engines for power generation, engines for water pumping, et cetera), then the APCD would be acting as a Responsible Agency under the California Environmental Quality Act (CEQA) and would rely on the project's environmental analysis when evaluating any APCD permits for proposed equipment. However, the project description does not contain enough information for APCD staff to determine whether this project will require any APCD permits and thus, whether the APCD is a Responsible Agency for this project.

If an APCD permit is required for any project equipment or operations, the project's environmental analysis should include the air pollutant emissions for all proposed equipment and activities to avoid additional CEQA documentation requirements related to APCD permit issuance.

2. **Odor abatement:** This project has the potential to cause odor impacts because of the nature of the operation. The applicant should design the project to minimize the potential for odor generation and public nuisance complaints through controls or abatement techniques, and comply with the requirements of the County's Cannabis Regulations, Section C.6.
3. **New Source Review:** If an APCD permit is required for any project equipment or operations, the APCD will evaluate the emissions from the project to determine whether any New Source Review requirements will apply.
4. **Health Risk:** If an APCD 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 APCD permit issuance, the project may be required to prepare a Health Risk Assessment to determine the potential level of risk associated with proposed operations.
5. **Permit Timing:** The APCD permit process can take several months. If an APCD permit is required for the project, the applicant is encouraged to submit their Authority to Construct permit application to the APCD as soon as possible, see www.ourair.org/permit-applications/ to download the necessary permit application(s).

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 erw@sbcapcd.org.

Sincerely,



Emily Waddington,
Air Quality Specialist
Planning Division

cc: Robert B. Kressa II
David Harris, Supervisor, APCD Engineering Division
Michael Goldman, Manager, APCD Engineering Division
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