



**Santa Barbara County
Air Pollution Control District**

March 15, 2019

Melanie Jackson
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

**Re: APCD Revised Incompleteness Items on 805 Ag Holdings LLC – Cannabis Cultivation (Site 5),
19CUP-00000-00006, 19DVP-00000-00012**

Dear Melanie Jackson:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of outdoor cannabis cultivation of approximately 60,000 square feet in 26 hoop houses. No buildings exist on the parcel and no new buildings are proposed. A photovoltaic system is proposed to power the security lighting and cameras. The project is expected to employ four full-time and 15 seasonal employees. No grading or new water wells are proposed. The subject property, a 100-acre parcel, zoned AG-II-100, is identified in the Assessor Parcel Map Book as APN 131-090-079, and is located at 1750 Tepusquet Road in the unincorporated area of Santa Maria.

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 a description of any existing and proposed combustion equipment that will be installed and/or operated onsite to support the proposed project. This could include large water heaters and boilers and other engines to supply power to equipment, facilities, or operations (such as power to structures, water pumps, electric power generators). **For all existing and proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, manufacturer specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.**

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. "Emergency Use" is defined in Section §93115.4 of the Airborne Toxic Control

Measure for Stationary Compression Ignition Engines.¹ **Please note that the use of a diesel-fired generator during periods when a solar power system is not providing sufficient power does not meet the ATCM definition of “Emergency Use.”**

- b. Please state whether any cannabis manufacturing will be taking place onsite. For the proposed cannabis processing (including drying) and any cannabis manufacturing please describe in detail the processes, equipment, and end-product. The provided Cannabis Supplemental Application for this project states that no drying will take place onsite; however, the provided Site Map displays 5,760 square feet of new hoop houses for drying. Please include clarification on whether cannabis drying would be taking place onsite.
2. If a vapor phase odor control system is proposed, 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 a proposed 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. It is our understanding that an Odor Abatement Plan is required for this project. Please provide an Odor Abatement Plan that describes how the project will comply with the requirements of the County’s Cannabis Land Use Ordinance, Section C.6. Include a detailed description of any proposed odor controls or techniques for abatement of odors.
5. Please describe the existing and proposed electrical infrastructure on the property. Include a description of how power will be supplied to meet the electrical needs of all the existing and proposed land uses and structures on the property. Include the expected energy output of the proposed photovoltaic unit and how this will affect the project’s overall electrical demand.
6. Please provide the expected trip generation as a result of the proposed project, including the expected average daily trips and trip types (e.g. worker commute, delivery, etc.).
7. Please provide an estimation of expected energy use, water use, and waste disposal. This information is necessary to quantify the long-term indirect greenhouse gas emissions generated by 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

¹ www.arb.ca.gov/diesel/documents/FinalReg2011.pdf

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 in accordance with the County of Santa Barbara Cannabis Land Use Ordinance 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).

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.

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: Cal Coast Compliance
David Harris, Supervisor, APCD Engineering Division
Michael Goldman, Manager, APCD Engineering Division
Planning Chron File