



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

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 From the Earth LLC - Retail Cannabis - Delivery,
19CUP-00000-00007**

Dear Melanie Jackson:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of tenant improvements to an existing retail/commercial structure to operate a delivery-only retail cannabis business. The lease area will not be open to the public. The structure will be utilized to store pre-packaged cannabis products prior to delivery. Any cannabis material that will be in transport will be in a sealed and locked container. The business will have two full time onsite employees and one to five delivery staff as needed. Grading will not be required. The subject property, a 5.99-acre parcel, zoned OT-R/GC, is identified in the Assessor Parcel Map Book as APN 105-073-014, and is located at 117 E. Clark Avenue in the community of Orcutt.

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 all 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 engines to supply power to equipment, 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, manufacturer specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.**

- b. Please state whether any cannabis processing or manufacturing will be taking place onsite. For any proposed cannabis processing and/or manufacturing please describe in detail the processes, equipment, and end-product.
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 Cannabis Land Use Ordinance, Section C.6. Include a detailed description of any proposed odor controls or techniques for abatement of odors.
5. 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 trips, delivery trips to customers, truck deliveries to the business etc.).

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 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: Stacey Wooten
David Harris, Supervisor, APCD Engineering Division
Michael Goldman, Manager, APCD Engineering Division
Planning Chron File