



**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 Incompleteness Items on Castillo Trust Cannabis Cultivation, 19CUP-00000-00010 & 19DVP-00000-00019**

Dear Melanie Jackson:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of mixed-light cannabis cultivation with the creation of 18 one-acre plots each containing 12 greenhouses, one 3.95-acre plot containing 24 greenhouses, and one 7.5-acre plot containing 47 greenhouses for a total of approximately 21 acres of cannabis cultivation. Each plot would be licensed under a separate operator. A 5,933 square foot (SF) prefabricated structure is proposed to be used for cannabis trimming and packaging. Forty 320 SF storage containers would be used onsite for cannabis drying. An offsite nursery would provide stock for onsite cultivation. Operations at the facility would include an average of 100 daily workers with a maximum of 110 daily workers. A trip generation report has been prepared for the project with an estimate of 178 average daily trips. The project proposes use of a Byers Odor Control system. The site would be served by an existing water well. The subject property, a 480.23-acre parcel zoned AG-II-320, is identified in the Assessor Parcel Map Book as APN 101-100-035 and is located at 8300 Cat Canyon in the unincorporated area of Los Alamos.

**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](mailto: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**

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**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 manufacturing (volatile or non-volatile) will be taking place onsite. For any proposed cannabis manufacturing please describe in detail the processes, equipment, and end-product.
2. For the Byers 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](http://www.ourair.org/wp-content/uploads/6100-020-1.pdf).
3. A health risk assessment should be performed if the proposed Byers 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. Please expand on the "Odor Control" section of the provided Standard Operating Procedure to include all items required by the County Cannabis Land Use Ordinance, Odor Abatement Plan, Section C.6:
  - 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. Designation of an individual (local contact) who is responsible for responding to odor complaints.
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.
6. 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.
7. Does the project propose any excavation? If so, what is the estimated amount of cut and fill in cubic yards? What is the estimated amount of cut that will be exported from the site in cubic yards?



8. Please describe the condition of the road that will be used to transport the stock cannabis onsite for cultivation. If the road is not a paved asphalt road, the potential operational fugitive dust generation from travel on the unpaved road should be quantified.

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, certain odor control equipment, 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/](http://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](mailto: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