



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

March 22, 2019

Monica Esparza
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

**Re: APCD Incompleteness Items on Orbiter Inc./Saga Inc. Cannabis Cultivation,
19DVP-00000-00017**

Dear Ms. Esparza:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the conversion of existing greenhouses totaling approximately 185,695 square feet for cannabis cultivation, processing and transport-only distribution. Processing will take place at the North end of the greenhouses. An odor abatement plan using a Byers vapor phase odor control system is proposed. The project anticipates approximately 15-20 employees. The project site is served by an existing water well and municipal power. No excavation is required. The subject property, a 6.42-acre parcel zoned AG-I-10, and identified in the Assessor Parcel Map Book as APN 004-003-005, is located at 4555 Foothill Road in the unincorporated area of Carpinteria.

At the County's Subdivision Development Review Committee on March 7, 2019, a representative from the project stated that a 125kW emergency generator is located onsite. Cannabis manufacturing (volatile and nonvolatile) will not be taking place onsite.

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 the proposed operation may be subject to APCD permit requirements. Please compile the information necessary to address the item 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. In addition to the 125 kw emergency generator, 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, 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 the existing emergency generator and any other proposed**

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combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, and manufacturer specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.

2. 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, transport of products onsite, import and export trips including but not limited to delivery, distribution, retail, etc.).
3. 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.
4. For the proposed Byers vapor phase odor control systems, please provide all chemical constituents contained in all 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.
5. A health risk assessment should be performed if the 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>).

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) 961-8873 or via email at HoD@sbcapcd.org.

Sincerely,



Desmond Ho
Air Quality Specialist
Planning Division

cc: Jay Higgins – Agent
David Harris, Supervisor, APCD Engineering Division
Michael Goldman, Manager, APCD Engineering Division
Eric Kett, Supervisor, APCD Compliance Division
Planning Chron File