



April 23, 2019

Joe Pearson II
Planning and Environmental Review
City of Goleta
130 Cremona Dr. Suite B
Goleta, CA 93117

Re: APCD Incompleteness Items on Sublime Cannabis Manufacturing, 18-162-DPAM

Dear Mr. Pearson II:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the improvements to an existing 4,700 square foot building for cannabis non-volatile manufacturing and a 1,100 square foot office space. Of the 4,700 square feet (SF), 206 SF will be used for receiving, 214 SF for cannabis plant material storage, 214 SF for pre-processing, 209 SF for weighing and logging, 229 SF for extraction and refinement, 91 SF for waste storage, 209 SF for distillation and production formulation, 214 SF for infusion, 214 SF for packaging, and 181 SF for secure storage. An odor abatement plan was included and proposes the use of activated carbon filtration systems. The subject property, a 0.88-acre parcel zoned M-1, and identified in the Assessor Parcel Map Book as APN 073-070-001, is located at 123 Aero Camino, Unit A, in the City of Goleta.

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 several 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. For the processing that will be taking place onsite as well as any manufacturing, please describe in detail the processes, equipment, and the end-product. Please also describe in greater detail the structures onsite in which the processing and manufacturing would take place.
 - b. 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.

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- c. 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, facilities, or operations (such as power to structures, water pumps, electric power generators). Please note that the City of Goleta Cannabis Land Use Ordinance prohibits the use of generators for cultivation, 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. 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 and distribution trips/trucks, 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.

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 equipment or operations that would require an air district permit (e.g., for a boiler, engines for power generation, engines for water pumping, drying and curing activities and associated odor control equipment, cannabis oil manufacturing, emissions control equipment, 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.

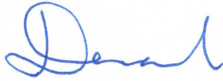
If an APCD permit is required for any project equipment or operations, the project's environmental analysis should include the air pollutant emissions for all proposed equipment and activities to avoid additional CEQA documentation requirements related to APCD permit issuance.

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 City's Cannabis Ordinance 18-03, Section I.1.d.
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: David Harris, Supervisor, APCD Engineering Division [email only]
Michael Goldman, Manager, APCD Engineering Division [email only]
Planning Chron File