



air pollution control district
SANTA BARBARA COUNTY

April 25, 2019

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

Re: APCD Incompleteness Items on CVW Organics, 19DVP-00000-00001

Dear Ms. Esparza:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the permitting of a 3,200 square foot (SF) prefabricated storage building, a 1,200 SF boiler house, 13,000 SF greenhouse, a 98,200 SF greenhouse, and a 30,000 SF temporary hoop house. The project site has existing agricultural uses – no additional employees or traffic will result. A transportation plan is provided. An odor control plan is provided and a vapor-phase odor mitigation system will be installed. The project site is served by municipal water and power. No grading is required. The subject property, comprised of three AG-I-5 parcels totaling 16.42-acres, and identified in the Assessor Parcel Map Book as APNs 004-013-002, 004-013-003, 004-013-024, is located at 1296-1480 Cravens Lane in the unincorporated area of Carpinteria.

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 item:

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. 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 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**

Aeron Arlin Genet, Air Pollution Control Officer

specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.

2. For the proposed 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.
3. 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 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. **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

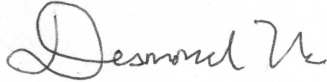
April 25, 2019

Page 3

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,

A handwritten signature in cursive script, appearing to read "Desmond Ho".

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