

May 5, 2020

Kimberley McCarthy
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: Santa Barbara County Air Pollution Control District Suggested Conditions Autumn Brands and Ocean Hill Farms, 19CDH-00000-00001

Dear Kimberley McCarthy:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of mixed light and nursery cannabis cultivation in 402,350 square feet (SF) of existing greenhouses. Approximately 24,981 SF of the area will be used for ancillary cultivation activities such as drying, trimming and packaging. Processing including drying, trimming, and packaging will occur within an existing 4,870 SF structure. Distribution will be limited to removal of product from the site. Other modifications include the demolition and removal of two water tanks, a shipping container, two storage structures, and an overhang on a processing structure.

A Hipower HNG 210 T6 6-cylinder spark ignition emergency generator will be installed and used to power the camera and security system in the event of a power shut off. The Odor Abatement Plan includes the use of a Byers vapor-phase odor mitigation system with Ecosorb CNB107 and carbon filtration systems for the processing areas of the facility. The site is served by existing water wells, municipal water, and municipal electricity. No grading is proposed. The subject property, a 24-acre parcel zoned AG-I-20 and identified in the Assessor Parcel Map Book as APN 005-280-041, is located at 3615 Foothill Road in the unincorporated Carpinteria area.

Air Pollution Control District staff have the following specific **advisories and recommendations** related to the proposed project:

1. Based on the project description and information that has been provided, the project does not require a District permit. However, if the project description changes, the applicant should refer to the District's cannabis permitting webpage at www.ourair.org/cannabis/ to determine if any equipment or operations will require District permits.
2. Indoor and mixed-light cultivation (e.g., greenhouses) located near residential, commercial and other sensitive receptors shall abate cannabis odors through the use of containment, ventilation, filters, control and/or deodorizing systems. Outdoor cultivation and growing operations also create strong cannabis odors, and the District recommends that such operations not be located near public locations such as residences, commercial buildings, or other sensitive receptors. The District encourages the use of buffer zones to allow for maximum odor dispersion, as well as other odor abatement strategies, to avoid nuisance odors.

Aeron Arlin Genet, Air Pollution Control Officer

3. Any chemical used for deodorizing systems shall not cause adverse impacts to the community. Low-VOC (volatile organic compound) or no-VOC compounds are recommended, as well as compounds that do not contain toxic air contaminants (TACs) as identified by the State of California. The comprehensive list of TACs can be found at www.arb.ca.gov/toxics/healthval/contable.pdf. If odor control systems use chemicals that contain TACs, the County shall assess the potential for health risk by performing a refined Health Risk Assessment.

Air Pollution Control District staff offer the following suggested conditions:

1. Spark ignition piston-type internal combustion engines (e.g., gasoline or propane-fired) used exclusively for emergency electrical power generation or emergency pumping of water for flood control or firefighting are **exempt** from permit requirements pursuant to District Rule 202, Section F.1.d., **provided the engine operates no more than 200 hours per calendar year and a record is maintained and is available to the District upon request**. The record shall list the identification number of the equipment, the number of operating hours on each day the engine is operated and the cumulative total hours.
2. Odor abatement strategies shall be implemented as laid out in a comprehensive odor abatement plan to ensure that cannabis odors are not detected by nearby residential areas or sensitive receptors. All odor abatement technology shall be operated according to the manufacturer's specifications and/or as recommended by a professional engineer or certified industrial hygienist. Any changes to the odor abatement chemical/solution or odor abatement technology shall be reviewed and approved by the County.
3. The applicant is required to complete and submit an **Asbestos Demolition/Renovation Notification or an EXEMPTION** from Notification for Renovation and Demolition (District Form ENF-28 or District Form ENF-28e), which can be downloaded at www.ourair.org/compliance-forms/ for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed exemption or notification should be presented, mailed, or emailed to the District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. The applicant should visit www.ourair.org/asbestos/ to determine whether the project triggers asbestos notification requirements or whether the project qualifies for an exemption.
4. Natural gas-fired fan-type central furnaces with a rated heat input capacity of less than 175,000 Btu/hr and water heaters rated below 75,000 Btu/hr must comply with the emission limits and certification requirements of District Rule 352. Please see www.ourair.org/wp-content/uploads/rule352.pdf for more information.
5. Boilers, water heaters, and process heaters (rated between 75,000 and 2.0 million Btu/hr) must comply with the emission limits and certification requirements of District Rule 360. Note: Units fired on fuel(s) other than natural gas still need to be certified under Rule 360. Please see www.ourair.org/wp-content/uploads/rule360.pdf for more information.

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.

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Sincerely,

Desmond Ho

Desmond Ho
Air Quality Specialist
Planning Division

cc: Zoe Carlson, Dudek
William Sarraf, Supervisor, District Engineering Division [email only]
David Harris, Manager, District Engineering Division [email only]
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