

May 22, 2020

Sarah Marshall  
Santa Barbara County  
Planning and Development  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: Santa Barbara County Air Pollution Control District Suggested Conditions on Emmawood B1 LLC. Cannabis Cultivation, 19CDH-00000-00019**

Dear Sarah Marshall:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of mixed light and nursery cannabis cultivation in 349,396 square feet (SF) of existing greenhouses. All associated ancillary processing such as drying, trimming, and packaging will occur within an existing 12,041 SF packing house. Interior renovations include the reconfiguration of demise walls in the packing house and various fire protection measures. Improvements to the facility include a new septic system to serve the processing building, a hammerhead turnaround-access, and the installation of fourteen 5,000-gallon irrigation water storage tanks. The project will also include the restoration of agricultural dwelling units and the demolition of an unpermitted storage unit. An existing 1,200 SF boiler room is located between the greenhouses and the boilers are used for cultivation only. A new 30kW (40hp) Generac SD030 emergency standby diesel generator is proposed and used for cultivation purposes only.

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 16.35-acre parcel zoned AG-I-10 and identified in the Assessor Parcel Map Book as APN 001-080-042, is located at 5888 Via Real in the unincorporated area of Carpinteria.

The District has prepared an *Advisory on Air Quality and Cannabis Operations* (available at [www.ourair.org/land-use](http://www.ourair.org/land-use)) that provides local agencies and cannabis operators guidance regarding the air quality aspects of this industry. The advisory discusses the District's regulatory limitations on odors from agricultural operations, recommendations for odor abatement, and cannabis-related operations that may require a District permit. This advisory should be carefully reviewed by the County and cannabis operator.

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/](http://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.
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](http://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. All agricultural diesel engines rated at 50 brake-horsepower or greater must be registered with the District. Please refer to the District's website at [www.ourair.org/ag-diesel-registration/](http://www.ourair.org/ag-diesel-registration/) for additional information.
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/](http://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/](http://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](http://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](http://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](mailto:HoD@sbcapcd.org).

Sincerely,

*Desmond Ho*

Desmond Ho  
Air Quality Specialist  
Planning Division

cc: Jay Higgins, H&H Environmental  
William Sarraf, Supervisor, District Engineering Division [email only]  
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