



air pollution control district  
SANTA BARBARA COUNTY

June 9, 2021

Greg Stones  
City of Lompoc  
Planning Division  
100 Civic Center Plaza  
Lompoc, CA 934326

**Re: Santa Barbara County Air Pollution Control District Comments on the Draft Mitigated Negative Declaration for Organic Liberty Lompoc LLC Industrial Cannabis Project**

Dear Greg Stones:

The Santa Barbara County Air Pollution Control District (District) has reviewed the Draft Mitigated Negative Declaration (MND) for the referenced project, which consists of the development of a commercial cannabis nursery, manufacturing, processing, and distribution project within a new approximately 90,865 square foot enclosed building on vacant property. The nursery rooms are climate-controlled with compressed carbon dioxide. Carbon dioxide will be stored in an approved aboveground pressurized tank located outside of the building. Processing activities involve drying using gas heaters, trimming, sorting, and packaging cannabis, including cannabis from offsite. Manufacturing operations propose use of ethanol extraction using a closed-loop extractor and further distillation. The extractor is a professionally engineered closed-loop system that uses approximately 30 gallons of temperature-controlled (chilled) ethanol per batch, with a 97% recovery rate. Up to five 55-gallon drums (275 gallons) of ethanol storage will be required at any one time. The applicant's estimates the facility will process approximately 2,000 pounds of biomass per day and 500,000 pounds per year. This will be accomplished by using two Delta Separation CUP-30 units, a single FFE unit, and two chiller units. At this production rate, approximately 300 pounds (40 gallons) of oil per day and 75,000 pounds (10,000 gallons) of oil per year will be produced. The facility will only sell cannabis products to state licensed facilities on a wholesale basis and will not be open to the public. The project is expected to employ up to 65 full-time and 15 part-time employees. An Odor Abatement Plan has been prepared which proposes carbon filtration technology and photocatalytic oxidative (PCO) air cleaners. A vapor-based odor control system may also be assessed if further odor abatement is necessary. An 800 kilowatt (approximately 1,073 brake horsepower), Tier 2 diesel-powered emergency generator is proposed. The subject property, two parcels of 1.92 and 1.83 acres, are zoned Business Park, and identified in the Assessor Parcel Map Book as APNs 093-450-055 and -056. The project is located at 1025 and 1035 West Central Avenue in the City of Lompoc.

Based on the project description and information that has been provided, the proposed project includes equipment and operations subject to District permit requirements and prohibitory rules. **Therefore, the District will be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the City's CEQA determination when evaluating District permits for proposed equipment.** The environmental document should include the air pollutant emissions for all proposed equipment, including Reactive Organic Compound (ROC) emissions from manufacturing operations, to avoid additional CEQA documentation requirements related to District permit issuance. In addition, the environmental document should include an accurate assessment of potential health risks from the

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proposed backup generator engine to ensure that project-related equipment will not result in a significant impact.

In order for the MND prepared by the City of Lompoc to be deemed adequate for the District's use as a Responsible Agency under CEQA, the following comments must be addressed:

**1. Environmental Checklist, Section 3 Air Quality, Methodology, Impact "b" and Table 5 Project Operational Emissions, Page 25-27:**

- a. The MND should describe the project's use of solvents including specific solvent types that will be used for manufacturing operations (including but not limited to solvents used for extraction, winterization, and wipe cleaning). For each solvent type, include the chemical components, physical properties, percent ROCs, and the maximum amounts of solvent usage on a daily and annual basis (gallons per day and gallons per year). The impact evaluation must quantify the air pollutant emissions (including ROCs) as a result of solvent usage, include the impacts as a result of solvent usage in the MND, determine the significance of those impacts and, if necessary, provide mitigation for any significant impacts.
- b. The project proposes several gas-fired heaters/air units throughout the building. Please indicate whether the energy consumption from these units is included in the provided project-specific natural gas usage rate of 97,017 therms per year. If it is not, please update the air quality impact analysis to include a description of the equipment, operating parameters, and a quantification of the criteria pollutants and greenhouse gas emissions from this combustion equipment.
- c. The maximum daily emissions for the proposed diesel emergency generator should be based on usage of two hours per day, which is the maximum allowable usage permitted by the District for maintenance and testing. Revise the daily emissions from the emergency generator in this table to reflect two hours of daily use.

**2. Environmental Checklist, Section 3 Air Quality, Impact "c", Page 29 and DICE Screening Health Risk Assessment:** The District requested and reviewed the modeling inputs of the SBCAPCD Diesel-Fired Internal Combustion Engine (DICE) Screening Tool that was used to assess the potential health risks from the proposed backup generator. Based on the submitted site plan in Figure 3 of the MND, the engine will be located adjacent to the proposed building. Therefore, it is not appropriate to exclude building downwash from the analysis. **District staff has determined that once building downwash is applied, the DICE Screening Tool shows a significant cancer risk from the proposed diesel emergency generator.** Therefore, the applicant should perform a site-specific health risk assessment (HRA) screening using the EPA AERSCREEN model and/or incorporate project design changes to reduce the health risk to below the level of significance. The applicant should work with the City to determine how the project will demonstrate that health risk from the emergency generator engine does not exceed the thresholds of significance. Please update the MND to include a revised evaluation of health risk from the proposed equipment. Mitigation should be applied to reduce any significant impacts to below significance.

For more information on site-specific HRA screenings, see [www.ourair.org/wp-content/uploads/User-Guide-for-HRA-Screenings.pdf](http://www.ourair.org/wp-content/uploads/User-Guide-for-HRA-Screenings.pdf). If revised modeling is conducted, the

District should be consulted and provided the results for review before incorporation into the final environmental document.

The following comments should be addressed if conducting revised modeling:

- a. Include building downwash in the analysis.
  - b. Verify the correct engine size is used in the revised modeling. The submitted specification sheet indicates that the engine is 1207 bhp, but the Dice Screening Tool uses an engine size of 1195 bhp.
  - c. Verify the distance of the engine to the nearest worker and resident via aerial imagery.
  - d. Include the revised screening health risk assessment results in the appendices of the final environmental document.
- 3. Environmental Checklist, Section 8 Greenhouse Gas Emissions, Table 10 Combined Annual Emissions of Greenhouse Gas Emissions, Page 51:** Please include the greenhouse gas emissions due to testing and maintenance of the emergency diesel generator in this analysis.

In addition, District staff suggest the following corrections be made to the Draft MND:

- 1. Environmental Checklist, Section 3 Air Quality, Construction, Page 26:** This discussion states that *"SBCAPCD has established construction thresholds for ROC and NOx because of its recent designation of nonattainment-transitional for ozone under the California Clean Air Act."* This statement is inaccurate. The District does not have adopted CEQA thresholds for construction emissions. Please correct the discussion and reference in *Table 4 Project Construction Emissions*.
- 2. Environmental Checklist, Section 3 Air Quality, Construction, Page 26-27:** Please update the CalEEMod analysis to include emissions from the 3,930 cubic yards of fill that will be imported during the construction phase of the project.
- 3. Environmental Checklist, Section 8 Greenhouse Gas Emissions, Methodology, Page 48:** The analysis should be revised to use current energy intensity factors for the utility provider. The 2018 energy intensity factors for PG&E (used in the latest version of CalEEMod, version 2020.4) are 203.983 lbs CO<sub>2</sub>/MWhr, 0.033 lbs CH<sub>4</sub>/MWhr and 0.004 lbs N<sub>2</sub>O/MWhr.
- 4. Environmental Checklist, Section 8 Greenhouse Gas Emissions, Mitigation Measure GHG-1 GHG Emissions Reduction Plan, Pages 52-53:** If the GHG Emissions Reduction Plan (GGRP) option is chosen, it should include requirements that ensure the ongoing monitoring, reporting, and enforcement of the GHG reduction commitments detailed in the GGRP for the life of the project. Monitoring, reporting, and enforcement of the GGRP should be made a condition of approval for the project.

Lastly, the applicant is advised of the following additional regulatory requirements or analysis that may be applicable to the project during the District permitting process:

1. **Use of Ozone Generators:** The District does not recommend the use of ozone generators or photocatalytic oxidation air cleaners (also known as PCO air cleaners or hydroxyl generators) for odor mitigation<sup>1,2</sup>, unless the cleaning device is certified by the California Air Resources Board (CARB).<sup>3</sup> Proposed generators could produce ozone levels that are above the state standard for ozone.
2. **Health Risk from Deodorizing Systems:** Any chemical used for deodorizing systems 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 here: [www.arb.ca.gov/toxics/id/taclist.htm](http://www.arb.ca.gov/toxics/id/taclist.htm). If odor control systems use chemicals that contain TACs, the City should assess the potential for health risk by performing a refined Health Risk Assessment.
3. **New Source Review:** The District will evaluate the emissions from the project to determine which New Source Review requirements will apply.
4. **Best Available Control Technology:** Based on the information provided for review, it appears that the proposed project may trigger the District's threshold for requiring implementation of Best Available Control Technology (BACT) for ROC emissions. If ROC emissions from the project exceed the BACT threshold of 25 pounds per day, then the applicant shall propose emission controls that represent BACT for their processes. The applicant should refer to District Rule 802 at [www.ourair.org/wp-content/uploads/rule802.pdf](http://www.ourair.org/wp-content/uploads/rule802.pdf) for more information on New Source Review and BACT requirements.
5. **Health Risk Assessment:** As part of District permit issuance, an evaluation of health risk will be required to demonstrate that the operation of project-related equipment does not cause a significant risk to the surrounding community and nearby sensitive receptors. Whenever a Health Risk Assessment (HRA) analysis is required, we recommend including the results in the environmental document to ensure that project-related equipment will not result in a significant impact. **The District will not issue a permit if an HRA shows that a significant impact will occur.** For District permit issuance, the applicant will need to demonstrate that the project's health risk is below the significance thresholds.
6. **Permit Timing:** The District permit process can take several months. To avoid delay, the applicant is encouraged to submit their Authority to Construct permit application to the District as soon as possible, see [www.ourair.org/permit-applications](http://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) 961-8878 or via email at [WaddingtonE@sbcapcd.org](mailto:WaddingtonE@sbcapcd.org).

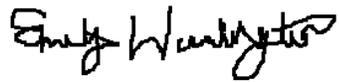
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<sup>1</sup> California Air Resources Board. *Hazardous Ozone-Generating 'Air Purifiers'*. [www.arb.ca.gov/research/indoor/ozone.htm](http://www.arb.ca.gov/research/indoor/ozone.htm)

<sup>2</sup> Environmental Protection Agency. [www.epa.gov/sites/production/files/2018-07/documents/residential\\_air\\_cleaners\\_-\\_a\\_technical\\_summary\\_3rd\\_edition.pdf](http://www.epa.gov/sites/production/files/2018-07/documents/residential_air_cleaners_-_a_technical_summary_3rd_edition.pdf)

<sup>3</sup> California Air Resources Board. *List of CARB-Certified Air Cleaning Devices*. [ww2.arb.ca.gov/list-carb-certified-air-cleaning-devices](http://ww2.arb.ca.gov/list-carb-certified-air-cleaning-devices)

Sincerely,

A handwritten signature in black ink that reads "Emily Waddington". The signature is written in a cursive, slightly slanted style.

Emily Waddington  
Air Quality Specialist  
Planning Division

cc: David Harris, Engineering Division Manager [email only]  
William Sarraf, Engineering Division Supervisor [email only]  
Planning Chron File