



air pollution control district

SANTA BARBARA COUNTY

June 14, 2019

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

Re: Air Pollution Control District Suggested Conditions on CVW Organics – Cannabis Cultivation, 19DVP-00000-00001

Dear Ms. Esparza:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of the request to cultivate cannabis using mixed-light. The project consists of permitting one 56,300 square foot (SF) greenhouse, one 30,740 SF greenhouse, one 11,000 SF greenhouse, one 3,200 square foot (SF) prefabricated storage building, and 30,000 square feet of hoop houses. The existing 7,500 SF processing structure at 1296 Cravens Lane will be used for processing and packaging cannabis. The existing 31,250 structure at 1400 Cravens Lane will be used for packaging, loading, and storage. The project site has existing agricultural uses – no additional employees or traffic will result. The Odor Abatement Plan proposes a Byers vapor-phase odor mitigation system. The project site is served by municipal water and power. No grading is required. Surrounding uses of the project site include single family residence to the south and west and agricultural uses to the north and east. 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, 1400, and 1480 Cravens Lane in the unincorporated area of Carpinteria.

The proposed project may include equipment or operations that may be subject to District permit requirements and prohibitory rules. ***Therefore, the District may be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the County's CEQA determination when evaluating any District permits for proposed equipment.*** If an environmental document is prepared pursuant to CEQA, the air quality analysis should include the air pollutant emissions for all proposed equipment to avoid additional CEQA documentation requirements related to District permit issuance.

The District has prepared an *Advisory on Air Quality and Cannabis Operations* (available at 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 has the following specific advisories and recommendations related to the proposed project:

Aeron Arlin Genet, Air Pollution Control Officer



805.961.8800



260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110



ourair.org



@OurAirSBC

1. Post-harvest cannabis operations may be required to obtain District permits pursuant to Rule 201 (*Permits Required*) due to the issuance of air contaminants. Examples of processes and/or equipment used in cannabis-related operations that may require a District permit include:
 - Boilers and hot water heaters,
 - Emergency standby generators,
 - Emission control equipment,
 - Incinerators,
 - Cannabis extraction manufacturing including use of volatile compounds or solvents, and
 - Other internal or external combustion equipment.

Please contact the District Engineering Division Supervisor, David Harris, to determine applicable permitting requirements at (805) 961-8824 or HarrisD@sbcapcd.org.

2. Indoor and mixed-light cultivation (e.g., greenhouses) located near residential, commercial and other sensitive receptors should 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. The District recommends the use of odor abatement measures and proper design of odor abatement systems by a professional engineer and/or certified industrial hygienist. The odor abatement system should be designed to ensure that cannabis odors are not detected by nearby residential areas or sensitive receptors.
4. Any chemical used for deodorizing systems should 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 should assess the potential for health risk by performing a refined Health Risk Assessment.
5. The District recommends that boilers, water heaters, and process heaters rated between 2 million to 5 million BTU/hr comply with the emission limits and certification requirements of District Rule 361. Please see www.ourair.org/wp-content/uploads/Rule361.pdf for more information. Units rated above 5 million BTU/hr are recommended to comply with the emission limits and certification requirements of District Rule 342. Please see www.ourair.org/wp-content/uploads/rule342.pdf for more information.

Air Pollution Control District staff offers the following suggested **conditions**:

1. Stationary and portable diesel-fired emergency standby generator engines rated 50 bhp or greater must be either registered or permitted by the District. Please refer to the District's website at www.ourair.org/ag-diesel-registration and www.ourair.org/dice-atcm for additional information. In addition, these engines must also comply with the state Airborne Toxic Control

Measure for Stationary Compression Ignition Engines. Please see <https://www.ourair.org/wp-content/uploads/finalreg2011.pdf> for more information.

2. Cannabis operations have the potential to generate strong odors that could negatively affect the surrounding community and cause a public nuisance. District Rule 303 (*Nuisance*), which generally prohibits the discharge of air contaminants (including odors) that cause a public nuisance, applies to all cannabis operations unrelated to the growing and harvesting of cannabis, including cannabis manufacturing (including but not limited to volatile extraction, non-volatile extraction, and cold-process extraction), retail storefronts, and smoking lounges. Manufacturing and retail operations should be managed to reduce odor impacts and avoid a violation of District Rule 303.
3. 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.
4. 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.
5. At all times, idling of heavy-duty diesel trucks should be minimized; auxiliary power units should be used whenever possible. State law requires that:
 - Drivers of diesel-fueled commercial vehicles shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location.
 - Drivers of diesel-fueled commercial vehicles shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle. Trucks with 2007 or newer model year engines must meet additional requirements (verified clean APS label required).
 - See www.arb.ca.gov/noidle for more information.
6. Asphalt paving activities shall comply with District Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.

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 Van Wingerden

David Harris, Supervisor, District Engineering Division [email only]

Michael Goldman, Manager, District Engineering Division [email only]

Planning Chron File