



air pollution control district
SANTA BARBARA COUNTY

June 25, 2019

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

**Re: APCD Incompleteness Items for Casitas Greenhouse LLC. – Cannabis Cultivation,
19CDP-00000-00058**

Dear Ms. Esparza:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of cannabis cultivation in mixed-light greenhouses of approximately 3.1 acres in size with ancillary nursery, drying, and distribution uses. The project proposes the demolition of all unpermitted structures, totaling 82,900 square feet. The use of a vapor phase odor abatement system is also proposed. Approximately 10 employees will be required for this project. The project site is served by municipal water and power. The subject property, a 9.8-acre parcel zoned AG-I-10 and identified in the Assessor Parcel Map Book as APN 001-060-040, is located at 1552 Casitas Pass Road in the unincorporated Carpinteria area.

The District 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 District permit requirements, prohibitory rules, and other regulatory programs such as the state's Distributed Generation Program.

Please provide responses to the following items:

1. It appears that the proposed operation may be subject to District permit requirements. Please compile the information necessary to address the items below, and contact District 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, water well drilling, 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, anticipated hours of fuel usage and amount of fuel usage, and manufacturer specifications.**

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- b. Please state whether any cannabis manufacturing (volatile and/or non-volatile) will be taking place onsite. For the proposed cannabis processing (including drying and packaging) and any cannabis manufacturing please describe in detail the processes, equipment, and end-product.
2. If a vapor phase odor control system is proposed, 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 District 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. In May 2019, the District received information related to the OMI Industries Ecosorb CNB 100 odor neutralization product, and confirmed that none of the ingredients are considered toxic air contaminants (TACs) as identified by the State of California.
3. A health risk assessment should be performed if any 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>).
4. Please provide the expected trip generation as a result of the proposed project, including the expected average daily trips and trip types (e.g. worker commute, transport of products onsite, special events, import and export trips including but not limited to delivery, distribution etc.).
5. Please provide an estimation of expected energy use, water use, and waste disposal. This information is necessary to quantify the long-term indirect greenhouse gas emissions generated by the project.

Once the necessary information is provided and reviewed for completeness, the District will submit a departmental condition letter for the project. Please ensure that all applicable District conditions are included with the Conditions of Approval for the project.

District 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 District staff to determine whether this project will require any District permits and thus, whether the District is a Responsible Agency for this project.

If a District 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 District 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 Regulations, Section C.6.
3. **New Source Review:** If a District permit is required for any project equipment or operations, the District will evaluate the emissions from the project to determine whether any New Source Review requirements will apply.
4. **Health Risk:** If a District permit is required for any project equipment or operations and the project has the potential to emit toxic or hazardous air pollutants, as part of District permit issuance, the project may be required to prepare a Health Risk Assessment to determine the potential level of risk associated with proposed operations.
5. **Permit Timing:** The District permit process can take several months. If a District permit is required for the project, 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/ 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,



Desmond Ho,
Air Quality Specialist
Planning Division

cc: Amy Steinfeld
David Harris, Supervisor, District Engineering Division [email only]
Michael Goldman, Manager, District Engineering Division [email only]
Planning Chron File