



**air pollution control district**  
SANTA BARBARA COUNTY

July 1, 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 Sea View Farms – Mixed-Light Cannabis Cultivation, 19CDH-00000-00011**

Dear Ms. Esparza:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of the permitting of approximately 140,000 square feet of existing greenhouses for cannabis nursery and cultivation. The applicant is proposing interior alterations to create an office space, dressing rooms, processing, and cooling areas. Processing will include ancillary drying, trimming, and packaging. Distribution is also proposed. The applicant will also install 33 new 200,000 BTU heaters that will be used for cultivation and nursery only. All existing unpermitted structures will be removed from the project site. 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 north and south and agricultural uses to the west and east. The subject property, a 5-acre parcel zoned AG-I-5 and identified in the Assessor Parcel Map Book as APN 065-250-031, is located at 1385 Anderson Lane in the unincorporated area of Goleta.

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 has the following specific advisories and recommendations related to the proposed project:

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.

Aeron Arlin Genet, Air Pollution Control Officer

Please contact the District Engineering Division Supervisor, David Harris, to determine applicable permitting requirements at (805) 961-8824 or [HarrisD@sbcapcd.org](mailto: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](http://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](http://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](http://www.ourair.org/wp-content/uploads/rule342.pdf) for more information.

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


1. The applicant is required to complete and submit an **Asbestos Demolition/Renovation Notification or an EXEMPTION** from Notification for Renovation and Demolition (APCD Form ENF-28 or APCD 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 Santa Barbara County Air Pollution Control 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.
2. 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.



3. 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.
4. 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](http://www.arb.ca.gov/noidle) 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  
Air Quality Specialist  
Planning Division

cc: Justin Morgan  
David Harris, Supervisor, District Engineering Division [email only]  
Michael Goldman, Manager, District Engineering Division [email only]  
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