



air pollution control district  
SANTA BARBARA COUNTY

August 20, 2021

Dara Elkurdi  
Santa Barbara County  
Planning and Development  
624 W. Foster Road  
Santa Maria, CA 93455

**Re: Santa Barbara County Air Pollution Control District Incompleteness Items for Teixeira Cannabis Cultivation, 21CUP-00000-00018**

Dear Dara Elkurdi:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of 61 acres of cannabis cultivation in existing hoop structures. The property is currently approved for cannabis cultivation of 37 acres and is proposing an additional 23.99 acres. No processing or manufacturing will occur onsite. The project will employ 2-4 employees year-round and 15-20 employees during harvest season. Trip generation estimates have been provided. An Odor Abatement Plan has been provided which consists of use of a micro-fogging system designed by Fogco Inc. with the Cannabusters neutralizing product outside the hoop houses. No grading, new structures, or development is proposed. Onsite improvements include a well, well pump, hoop houses, and ranch roads. The subject property, a 75.17-acre parcel zoned AG-II-40 and identified in the Assessor Parcel Map Book as APN 129-170-025, is located at 4301 Dominion Road in the unincorporated area of Santa Maria.

**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. Please describe any **existing combustion equipment** that is currently operating onsite. This could include large water heaters, boilers, and engines to supply power to equipment, facilities, or operations. For all existing combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, anticipated hours of usage, amount of fuel used, and manufacturer specifications. In addition, specify the structures or operations that the existing equipment is supporting.
2. Please describe any **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, facilities, or operations. 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 proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type,

Aeron Arlin Genet, Air Pollution Control Officer

anticipated hours of usage, amount of fuel used, and manufacturer specifications. In addition, please specify the structures or operations that the proposed equipment will support.

3. **Please provide all chemical constituents contained in the Cannabusters neutralizing product used in the vapor phase system, the fraction by weight of all of the chemicals contained in such product, and proposed usage amounts for such product 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 District procedure for handling confidential information can be found here: [www.ourair.org/wp-content/uploads/6100-020-1.pdf](http://www.ourair.org/wp-content/uploads/6100-020-1.pdf).
4. A **health risk assessment** should be performed if a proposed vapor phase odor control system utilizes a chemical listed on the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* (see: [www.arb.ca.gov/toxics/healthval/healthval.htm](http://www.arb.ca.gov/toxics/healthval/healthval.htm) and [www.arb.ca.gov/toxics/healthval/contable.pdf](http://www.arb.ca.gov/toxics/healthval/contable.pdf)).
5. Please specify whether the project involves **onsite freezing or refrigeration** of cannabis. If yes, provide a description of the equipment that will be used to freeze and store cannabis onsite, including if the equipment is stationary, portable, and/or contained within the footprint of an existing or proposed structure. In addition, specify how power will be supplied to the proposed equipment and, if portable, how long the equipment will be located onsite.
6. Is the project proposing to use **transportation refrigeration units (TRUs)** to store product onsite? If so, please provide the approximate number of TRUs operating onsite on a daily and annual basis, their fuel type, and the approximate number of hours that diesel TRU engines would be operating on a daily and annual basis.
7. 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 District 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 District 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 APCD 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/cannabis/](http://www.ourair.org/cannabis/) 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).

Sincerely,



Emily Waddington  
Air Quality Specialist  
Planning Division

cc: Planning Chron File