

September 10, 2020

Sarah Marshall  
Santa Barbara County  
Planning and Development  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: Santa Barbara County Air Pollution Control District Comments on Casitas Greenhouse Cannabis Cultivation, 19CDP-00000-00058**

Dear Sarah Marshall:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of 113,400 square feet (SF) of mixed-light and 24,700 SF of nursery cannabis cultivation and processing in existing greenhouses. The project includes the demolition of all unpermitted structures totaling 83,400 SF. Existing boilers will be used for cultivation purposes only. A new 402hp Kohler 250REZXB emergency standby spark ignition generator is proposed and will be used to power non-cultivation related operations such as the odor control equipment, lighting, and security. The Odor Abatement Plan includes the use of a Byers vapor-phase odor mitigation system with Ecosorb CNB100. The site is served by existing water wells and municipal electricity. No grading is proposed. The subject property, a 9.28-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 area of Carpinteria.

District rules and regulations may apply to various aspects of the cannabis industry. This may include the need to obtain one or more permits or registrations. County staff and the cannabis operator should carefully review the District's *Cannabis Permitting Requirements & Nuisance Enforcement Table* and *Advisory on Air Quality and Cannabis Operations* (available at [www.ourair.org/cannabis](http://www.ourair.org/cannabis)). These resources provide 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.

The District advises that the following **applicable regulatory requirements** be included by the lead agency as conditions of approval for the proposed project:

1. Spark ignition piston-type internal combustion (IC) engines (e.g., gasoline-fired, natural gas-fired, propane-fired, etc.) with a rated brake horsepower of 50 or greater require a District permit. The proposed 600-horsepower natural gas-fired spark ignition piston-type internal combustion emergency/standby generator engine, if used exclusively for emergency electrical power generation, may be exempt from permit requirements pursuant to District Rule 202, Section F.1.d., provided the engine operates no more than 200 hours per calendar year and a record is maintained and is available to the District upon request. The record shall list the identification number of the equipment, the number of operating hours on each day the engine

is operated and the cumulative total hours. Failure to maintain records which meet the above requirements or violation of any District rule may result in the immediate loss of the permit exemption.

2. All portable diesel-fired construction engines rated at 50 bhp or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits prior to grading/building permit issuance. Construction engines with PERP certificates are exempt from the District permit, provided they will be on-site for less than 12 months.
3. The applicant is required to complete and submit an **Asbestos Demolition/Renovation Notification or an EXEMPTION** from Notification for Renovation and Demolition (District 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 shall 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 shall 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.
4. The proposed emergency/standby natural gas-fired spark ignition piston-type internal combustion engine is exempt from the requirements of Rule 333, *Control of Emissions from Reciprocating Internal Combustion Engines*, provided the engine maintains its permit exempt status under the provisions of District Rule 202, Section F.1.d (the engine operates no more than 200 hours per calendar year and a record is maintained and is available to the District upon request). If the proposed engine is required to obtain a District permit due to loss or ineligibility of the permit exemption, the requirements of Rule 333 would become applicable to the engine.

In addition, the District advises that the following **best practices** be conditioned by the lead agency as appropriate:

1. Indoor and mixed-light cultivation (e.g., greenhouses) located near residential, commercial and other sensitive receptors shall 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. Odor abatement strategies shall be implemented as laid out in a comprehensive odor abatement plan to ensure that cannabis odors are not detected by nearby residential areas or sensitive receptors. All odor abatement technology shall be operated according to the manufacturer's specifications and/or as recommended by a professional engineer or certified industrial hygienist. Any changes to the odor abatement chemical/solution or odor abatement technology should be reviewed and approved by the County.

Based on the information provided to date, it is uncertain whether the project will be subject to additional regulatory requirements or analysis. Be **advised** of the potential aspects below that may require further evaluation.

1. 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.
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. 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.

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*

Desmond Ho  
Air Quality Specialist  
Planning Division

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