



# air pollution control district

SANTA BARBARA COUNTY

October 25, 2019

Melanie Jackson  
Santa Barbara County  
Planning and Development  
624 W. Foster Road  
Santa Maria, CA 93455

**Re: Air Pollution Control District Incompleteness Items for Hillside Habits Cannabis Cultivation, 19CUP-00000-00019**

Dear Melanie Jackson:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of the permitting of approximately 1.2 acres of outdoor cannabis cultivation, 20,000 square feet (SF) of mixed-light cultivation, and 10,000 SF of nursery cultivation. Approximately 10,000 SF of outdoor cultivation would be in hoop structures. Additionally, five existing 2,700 SF greenhouses, two metal storage containers, and two sheds would be used for the cannabis operation including cannabis processing. An existing residence would remain on site. For odor control the project proposes the use of HEPA filters, active carbon filters, and ozone generators. The site would require four full-time and an additional 15 seasonal employees. No grading is proposed and the site is served by an existing water well. The subject property, a 20.01-acre parcel zoned AG-I-20 and identified in the Assessor Parcel Map Book as APN 099-350-001, is located at 2815 Wild Oak Road in the unincorporated Lompoc 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. Some aspects of the proposed operation may be subject to District permit requirements. Please compile the information necessary to address the items below, and contact the District Engineering Division to determine applicable permitting requirements. Contact information: David Harris, Engineering Division Supervisor, (805) 961-8824, [HarrisD@sbcapcd.org](mailto: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, and manufacturer specifications.**

Aeron Arlin Genet, Air Pollution Control Officer

- b. Please describe the cannabis processing that will be taking place on site. Also, 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. It is our understanding that an Odor Abatement Plan is required for this project. Please expand on the provided information to include all items required by the County Cannabis Land Use Ordinance, Odor Abatement Plan, Section C.6:
  - a. A floor plan, specifying locations of odor-emitting activity(ies) and emissions.
  - b. A description of the specific odor-emitting activity(ies) that will occur.
  - c. A description of the phases (e.g., frequency and length of each phase) of odor-emitting activity(ies).
  - d. Provide design drawings and technical brochures and/or vendor data for the odor control system(s) and building designs.
  - e. Designation of an individual (local contact) who is responsible for responding to odor complaints.
3. 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.
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 trips, delivery trips/trucks, etc.).

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. **Use of Ozone Generators:** The District does not recommend the use of ozone generators or photocatalytic oxidation air cleaners (also known as PCO air cleaners or hydroxyl generators) for odor mitigation<sup>1,2</sup>, regardless of whether the ozone generator is located in an unoccupied space. Santa Barbara County is currently designated nonattainment for the state ambient air quality standard for ozone; the proposed generators could produce ozone levels that are well above the state standard. Also, it is important that any chemical used for deodorizing systems 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 here: [www.arb.ca.gov/toxics/id/taclist.htm](http://www.arb.ca.gov/toxics/id/taclist.htm).
4. **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.
5. **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.
6. **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: Stacey Wooten, Cal Coast Compliance  
David Harris, Supervisor, District Engineering Division [email only]  
Michael Goldman, Manager, District Engineering Division [email only]  
Planning Chron File

---

<sup>1</sup> California Air Resources Board, *Hazardous Ozone-Generating 'Air Purifiers'*, [www.arb.ca.gov/research/indoor/ozone.htm](http://www.arb.ca.gov/research/indoor/ozone.htm)

<sup>2</sup> Environmental Protection Agency, [www.epa.gov/sites/production/files/2018-07/documents/residential\\_air\\_cleaners\\_-\\_a\\_technical\\_summary\\_3rd\\_edition.pdf](http://www.epa.gov/sites/production/files/2018-07/documents/residential_air_cleaners_-_a_technical_summary_3rd_edition.pdf)