



air pollution control district

SANTA BARBARA COUNTY

November 12, 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 Tep 6 Cultivation LLC – Outdoor Cannabis Cultivation, 19CUP-00000-00057

Dear Melanie Jackson:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of approximately 2.5 acres of outdoor cannabis cultivation within hoop houses. Drying would occur within eight of the proposed hoop structures and ancillary processing (trimming & packaging) will occur offsite. For odor abatement the project proposes use of HEPA filters, active carbon filters, and ozone generators. The Operations Plan includes use of a portable diesel tank and a solar array is included on site plans. Water service to the site will be provided by an offsite agricultural water well. The cannabis operation requires two part-time employees and up to 15 seasonal employees. The subject property, a 50.53-acre parcel zoned AG-I-40 and identified in the Assessor Parcel Map Book as APN 131-200-019, is located at 1400 Tepusquet Road in the unincorporated Santa Maria 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. Please describe any existing or proposed combustion equipment that will be installed and/or operated onsite to support the proposed project such as diesel 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.**
2. Please describe the electrical infrastructure on the property. Include a description of how power will be supplied to meet the electrical needs of all of the existing and proposed land uses and structures onsite. Include the expected energy output of the proposed photovoltaic unit and how this will affect the project's overall electrical demand.
3. 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.

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- 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.
4. 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.
 5. 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:

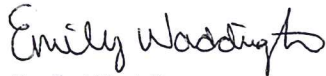
1. **Odor abatement:** This project has the potential to cause odor impacts because of the nature of the operation. The applicant should design the project to minimize the potential for odor generation through controls or abatement techniques, and comply with the requirements of the County's Cannabis Regulations, Section C.6.
2. **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^{1,2}, 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.
3. **Use of Diesel Generators with Solar Power System:** 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. "Emergency Use" is defined in Section §93115.4 of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines (see: www.arb.ca.gov/diesel/documents/FinalReg2011.pdf) Please note that the use of a diesel-fired generator during periods when a solar power system is not providing sufficient power does not meet the ATCM definition of "Emergency Use."

¹ California Air Resources Board, *Hazardous Ozone-Generating 'Air Purifiers'*, www.arb.ca.gov/research/indoor/ozone.htm

² 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)

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.

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