

air pollution control district

SANTA BARBARA COUNTY

November 22, 2019

Kimberley McCarthy
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: Air Pollution Control District Incompleteness Items for CP1 Supply Systems Inc. – Mixed-Light Cannabis Cultivation, 19CDH-00000-00019

Dear Kimberley McCarthy:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of approximately 334,961 square feet (7.69 acres) of mixed-light and nursery cannabis cultivation. Ancillary cultivation and processing (e.g., drying, trimming, packaging) will occur within the existing packing house. The project description includes the demolition of approximately 2,800 square feet of unpermitted storage structures and removal of an unpermitted employee dwelling. The project description includes transport-only distribution to remove the cultivated cannabis from the project site. An odor abatement plan was provided and proposes the use of a Byers vapor phase system with Ecosorb CNB 100 and 107. The project site is served by an existing agricultural water well and municipal power. The cannabis operation requires 13 to 20 employees dependent on the season/growth cycle. No grading is proposed. The subject property, a 16.36-acre parcel zoned AG-I-10 and identified in the Assessor Parcel Map Book as APN 001-080-042, is located at 5888 Via Real in the unincorporated Carpinteria area.

The District finds the application to be incomplete and requires more information about the proposed project to determine potential air quality impacts.

Please provide responses to the following items:

1. For the proposed Byers vapor phase odor control system with Ecosorb CNB 107, please provide all chemical constituents contained in all the compounds/products used in the vapor phase system, the fraction by weight of all of the chemicals contained in such compounds, and proposed usage amounts for all such compounds 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 at: www.ourair.org/wp-content/uploads/6100-020-1.pdf.
2. A health risk assessment should be performed if the 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 and www.arb.ca.gov/toxics/healthval/contable.pdf).

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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.

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. **District Permits:** Based on the project description and information that has been provided, the project does not require a District permit. However, if the project description changes, the applicant should refer to the District's cannabis permitting webpage at www.ourair.org/cannabis/ to determine if any equipment or operations will require District permits.
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.

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.

Sincerely,



Desmond Ho,
Air Quality Specialist
Planning Division

cc: Jay Higgins, H&H Environmental
David Harris, Supervisor, District Engineering Division [email only]
Michael Goldman, Manager, District Engineering Division [email only]
Planning Chron File