



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

February 27, 2019

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

Re: APCD Incompleteness Items on 805 Ag Holdings LLC – Cannabis Cultivation (Site 4), 19CUP-00000-00001, 19DVP-00000-00006

Dear Melanie Jackson:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of outdoor cannabis cultivation on 40 acres in 29 existing hoop structures. Cannabis would be transported to a different parcel two miles away for drying and processing. No buildings exist on the parcel and no new building structures are proposed. Two unpermitted emergency generators will be removed from the property. Electrical backup for a video surveillance system would be provided by a photovoltaic Uninterrupted Power Supply unit sufficient to supply a minimum of 24 hours of backup power to cameras and computers. Two independent air-filtration technologies (HEPA filters and ultraviolet light emitters) would be installed in all mechanical air-handling units. Active carbon filters would be installed at all air exhaust points. Additionally, commercial ozone generators would be installed and used in non-occupied non-accessible open spaces in the cultivation facility. The project is expected to employ four people. No grading is required nor new water wells proposed. The subject property, a 40-acre parcel, zoned AG-I-40, is identified in the Assessor Parcel Map Book as APN 131-090-027, and is located at 2907 Tepusquet Road in the unincorporated area of Santa Maria.

APCD 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 APCD permit requirements, prohibitory rules, and other regulatory programs such as the state's Distributed Generation Program.

Please provide responses to the following items:

1. It appears that aspects of the proposed operation may be subject to APCD permit requirements. Please compile the information necessary to address the items below, and contact APCD Engineering Division to determine applicable permitting requirements. Contact information: David Harris, Engineering Division Supervisor, (805) 961-8824, HarrisD@sbcapcd.org.
 - a. Please provide a description of any existing and proposed combustion equipment that will be installed and/or operated onsite to support the proposed project. This could include large water heaters and boilers and other engines to supply power to equipment, facilities, or operations (such as power to structures, water pumps, electric power generators). **For all existing and proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, manufacturer specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.**

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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.¹ “Emergency Use” is defined in Section §93115.4 of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines.² **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.”**

- b. Please state whether any cannabis manufacturing will be taking place onsite. For any proposed cannabis manufacturing please describe in detail the processes, equipment, and end-product.
2. Please expand on the “Noxious Odor Control” section of the provided Standard Operating Procedure 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 describe the existing and proposed electrical infrastructure on the property. Include a description of how power will be supplied to meet the electrical needs of all the existing and proposed land uses and structures on the property. Please include the expected energy output of the proposed photovoltaic unit and how this will affect the overall electrical demand of the proposed 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, delivery, cannabis transport, etc.).
5. Please describe the condition of the road that will be used to transport cannabis for drying and processing. If the road is not a paved asphalt road, the potential operational fugitive dust generation from travel on the unpaved road should be quantified.
6. 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.

APCD staff has the following initial advisories on the project:

¹ <http://cannabis.countyofsb.org/asset.c/69>

² www.arb.ca.gov/diesel/documents/FinalReg2011.pdf

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 APCD 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 APCD permits for proposed equipment. However, the project description does not contain enough information for APCD staff to determine whether this project will require any APCD permits and thus, whether the APCD is a Responsible Agency for this project.

If an APCD 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 APCD 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 in accordance with the County of Santa Barbara Cannabis Land Use Ordinance 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^{3,4}, 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.
4. **New Source Review:** If an APCD 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 an APCD 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 APCD 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 APCD permit process can take several months. If an APCD permit is required for the project, the applicant is encouraged to submit their Authority to Construct permit application to the APCD as soon as possible, see www.ourair.org/permit-applications/ to download the necessary permit application(s).

³ California Air Resources Board, *Hazardous Ozone-Generating 'Air Purifiers'*, www.arb.ca.gov/research/indoor/ozone.htm

⁴ Environmental Protection Agency, www.epa.gov/sites/production/files/2018-07/documents/residential_air_cleaners_-_a_technical_summary_3rd_edition.pdf

Once the necessary information is provided and reviewed for completeness, the APCD will submit a departmental condition letter for the project. Please ensure that all applicable APCD conditions are included with the Conditions of Approval for the project.

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: Cal Coast Compliance
David Harris, Supervisor, APCD Engineering Division
Planning Chron File