



air pollution control district
SANTA BARBARA COUNTY

July 9, 2020

Gwen Beyeler
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

Re: Santa Barbara County Air Pollution Control District Suggested Conditions on Central Coast Agriculture LLC, 19CUP-00000-00005, 19DVP-00000-00010

Dear Gwen Beyeler:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of cannabis cultivation of approximately 30 acres with 26 acres under existing hoop structures. There would be nursery cultivation activities within an existing 6,594 square foot (SF) greenhouse and 7,000 SF agricultural building. Processing would take place in an existing 3,100 SF warehouse as well as in the area around this building. Approximately 22 farmed acres would be processed from off-site on this farm, which would comprise up to 50% of the total harvested material processed on site. Harvest material storage would occur in 52 new refrigerated shipping containers and seed storage would take place in three refrigerated shipping containers. There would be transport only distribution, nursery research and development, and internal quality assurance testing in an existing 4,200 SF building. The operation includes up to 15 full-time employees and up to 20 additional employees during harvest season. The project does not propose cannabis manufacturing or the use of any stationary combustion equipment. The Odor Abatement Plan proposes use of the Byers vapor phase technology with Ecosorb® CNB 100. The subject property, a 68.19-acre parcel zoned AG-II-40 and identified in the Assessor Parcel Map Book as APN 083-180-007, is located at 8701 Santa Rosa Road in the unincorporated area of Buellton.

The District has prepared an *Advisory on Air Quality and Cannabis Operations* (available at www.ourair.org/land-use) that 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. This advisory should be carefully reviewed by the County and cannabis operator.

Air Pollution Control District staff have the following specific **advisories and recommendations** related to the proposed project:

1. 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. 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,

Aeron Arlin Genet, Air Pollution Control Officer

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.

3. The project proposes the use of Ecosorb® CNB 100 by OMI Industries for vapor phase odor mitigation. Any chemical used for deodorizing systems shall 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 District has confirmed that Ecosorb® CNB 100 do not contain TACs. The comprehensive list of TACs can be found at www.arb.ca.gov/toxics/healthval/contable.pdf. If odor control systems use chemicals that contain TACs, the County shall assess the potential for health risk by performing a refined Health Risk Assessment.

District staff offer the following suggested **conditions**:

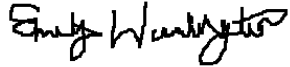
1. Odor abatement strategies shall be implemented as laid out in a comprehensive odor abatement plan to ensure that cannabis odors are not detected by nearby residential areas or sensitive receptors. All odor abatement technology shall be operated according to the manufacturers specifications and/or as recommended by a professional engineer or certified industrial hygienist. Any changes to the odor abatement chemical/solution or odor abatement technology shall be reviewed and approved by the County.
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 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 for more information.
4. At all times, idling of heavy-duty diesel trucks shall be minimized; auxiliary power units shall be used whenever possible. State law requires that:
 - Drivers of diesel-fueled commercial vehicles shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location.
 - Drivers of diesel-fueled commercial vehicles shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle. Trucks with 2007 or newer model year engines must meet additional requirements (verified clean APS label required).
 - See www.arb.ca.gov/noidle for more information.
5. The application of architectural coatings, such as paints, primers, and sealers that are applied to buildings or stationary structures, shall comply with District Rule 323.1, *Architectural Coatings* that places limits on the VOC-content of coating products.

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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,

A handwritten signature in black ink, appearing to read "Emily Waddington". The signature is fluid and cursive, with the first name "Emily" and last name "Waddington" clearly distinguishable.

Emily Waddington
Air Quality Specialist
Planning Division

cc: Lindsay Cokeley, CCA Agriculture [email only]
Matthew Allen, CCA Agriculture [email only]
David Harris, Manager, District Engineering Division [email only]
William Sarraf, Supervisor, District Engineering Division [email only]
Planning Chron File