



air pollution control district
SANTA BARBARA COUNTY

November 20, 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, comprising 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. An existing 4,200 SF building would be used for transport only distribution, nursery research and development, and internal quality assurance testing. 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.

District rules and regulations may apply to various aspects of the cannabis industry. This may include the need to obtain one or more permits or registrations. County staff and the cannabis operator should carefully review the District's *Cannabis Permitting Requirements & Nuisance Enforcement Table* and *Advisory on Air Quality and Cannabis Operations* (available at www.ourair.org/cannabis). These resources provide local agencies and cannabis operators guidance regarding the air quality aspects of this industry. 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.

The proposed project is subject to the following **regulatory requirements** that should be included as conditions of approval in the applicable land use permit:

1. 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.

Aeron Arlin Genet, Air Pollution Control Officer

805.961.8800

260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110

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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.

In addition, the District recommends that the following **best practice** be considered for inclusion as conditions of approval:

1. The project proposes the use of Ecosorb® CNB 100 by OMI Industries for vapor phase odor mitigation. Any chemical used for deodorizing systems should 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 does not contain TACs. If the odor control system(s) change to a system(s) that use chemicals that contain TACs, the County should assess the potential for health risk by performing a refined Health Risk Assessment. The comprehensive list of TACs can be found at www.arb.ca.gov/toxics/healthval/contable.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: 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]
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