



## Inspection Report ENF - 11

Santa Barbara County Air Pollution Control District  
260-A N San Antonio Rd, Santa Barbara, CA 93110

Inspection Information						
Inspector	Sage Swain	Date	10/07/2020	Time	14:00	16:00
Category	Permitted Facility		Type	Surveillance, Initial operations	Announced	Yes
NOV No	Rule Violated					
12587	Permits Required					
12589	Conditional Approval of ATC or PTO					
General Information						
SSID	11415	FID	11664	Inspection #	51458	
Permit(s)	ATC/PTO 15344 :: E/S Diesel Generator					
Facility	Central Coast Agriculture					
Company	Central Coast Agriculture					
Contact	Lindsay Cokeley		Telephone #	(818) 317-8414		
Facility Address	85 W.. Highway 246, #233					
City	Buellton	State	CA	Zip	93427	
Comments						
<p>Santa Barbara County Air Pollution Control District (District) Compliance Division Supervisor Eric Kett and I met Central Coast Agriculture's (CCA) Compliance Supervisor Lindsay Cokeley, Extraction Manager Matt Limon, Chemical Engineer Manager Craig Cox and Safety personnel Dylan at CCA's facility located at 1201 W. Chestnut Ave. in Lompoc. We were there to tour their facilities in order to determine if the processes taking place at this location required District permits.</p> <p>We asked that they show us their processes from start to finish. We started at their chemical storage area where the chemicals used for extraction are kept. The area contained large amounts of [REDACTED] that is used for extraction (see Attachment 1). Next, we were shown the locker where their cleaning solvents are kept (see Attachment 2). [REDACTED]</p> <p>[REDACTED]</p> <p>According to Mr. Limon, approximately [REDACTED] of extraction solvent is used per day and they process anywhere from [REDACTED] of raw cannabis per day. I was also informed that this facility had been operating since the fall of 2019.</p> <p>CCA also has an adjacent facility that they are hoping to expand into, but it is currently being used for various storage and a breakroom. The address is 1200 W. Laurel Ave. in Lompoc. It was explained that if and when they expand operations into this facility it would be part of the same stationary source as they are contiguous properties. This would mean that the emissions from both facilities would be within the same stationary source.</p>						



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There was also an Emergency Services Diesel Internal Combustion Engine (E/S DICE) that powers an emergency generator found on-site.

We then ended the walkthrough with Supervisor Kett and I explaining that this facility has many processes and equipment that would require a District permit. It was advised that CCA contact our Engineering Division as soon as possible and start the permitting process. CCA was also informed that a Notice of Violation (NOV) would be issued to document non-compliance for not obtaining a District permit for cannabis manufacturing, storage and distribution facilities. Supervisor Kett and I left the facility, concluding the inspection.

It was later discovered that the E/S Dice is associated with Authority To Construct/Permit To Operate (ATC/PTO) 15344 which was issued on 03/09/2019. However, the initial operations conditions 21.a and 21.b in the permit were never complied with and an annual report for calendar year 2019 required by condition 5 was not submitted. I called Ms. Cokeley and sent her the permit and informed her that an additional NOV would be issued to document the noncompliance with this permit. I also stated that the inspection conducted on 10/07/2020 would satisfy the initial operations conditions.

It should be noted that the E/S DICE found on-site matched the equipment description of the Equipment List of ATC/PTO 15344. I also sent Ms. Cokeley an email on 10/16/2020 outlining how to comply with the recordkeeping and reporting conditions in the permit (see Attachment 9).

NOV 12587 was issued to Ms. Cokeley on 10/26/2020 documenting violations of District Rule 201. District Rule 201 was violated by operating cannabis manufacturing, distribution and storage facilities located at 1201 W. Chestnut in Lompoc without the benefit of District permits.

NOV 12589 was issued to Ms. Cokeley on the same day documenting violations of District Rule 206. Specifically, conditions 5, 21.a. and 21.b. of ATC/PTO 15344 were not adhered to. Condition 5 requires the submittal of an annual report by March 1st. Condition 21.a. requires a start-up notification within 14 days of initial equipment operation. Condition 21.b. requires the arrangement of an inspection of the equipment within 14 days of initial equipment operation. None of the required actions were performed in the allotted timeframes and according to Ms. Cokeley, operations commenced on 11/01/2019.

When and if a NOV response is received in the future, I will update the necessary files at that time.

Attachments:  
Attachments 1-8 Inspection Photography  
Attachment 9: Correspondence

Engineering Notes  
The initial inspection for Central Coast Agriculture (FID 11664) for the E/S DICE installed under ATC/PTO 15344 was conducted on 10/07/2020. The equipment matched the permit's Equipment List. The start-up date was 11/01/2019 and NOV 12589 was issued to document noncompliance with conditions 5, 21.a and 21.b of the permit.

Completed by	Sage Swain	Date	10/27/2020
Reviewed by	Eric Kett	Date	11/03/2020

Email Read Receipt Requested

October 26, 2020

Lindsay Cokeley  
Central Coast Agriculture Inc  
Lindsay@ccagriculture.com

FID: 11664  
Permit: N/A  
SSID: 11415

Re: Notice of Violation 12587

Dear Ms. Cokeley,

Enclosed you will find Notice of Violation (NOV) 12587 documenting violations of District Rule 201. District Rule 201 was violated by operating cannabis manufacturing, distribution and storage facilities located at 1201 W. Chestnut in Lompoc without the benefit of District permits.

In order to bring this facility into compliance, please work with the District's Engineering Division to obtain the necessary permits as soon as possible.

Please feel free to submit any documentation of corrective actions taken to prevent continued or recurring violations to swains@sbcapcd.org within ten (10) days of receipt of the NOV. Alternatively, a NOV response may be mailed to my attention at: 301 E. Cook Street, Ste. L Santa Maria, CA 93454.

You will receive a separate letter from Mutual Settlement detailing the NOV resolution. Please refer to the District's Policy and Procedure regarding Mutual Settlement available at: <http://www.ourair.org/wp-content/uploads/VII.D.pdf>.

If you have any questions regarding this matter, please contact me at 805-614-6791, or swains@sbcapcd.org.

Sincerely,



Sage Swain  
Air Quality Specialist, Compliance Division  
Enclosed: NOV 12587



air pollution control district  
SANTA BARBARA COUNTY

## NOTICE OF VIOLATION

12587

VIOLATION NUMBER

10/07/2020

DATE OF DISCOVERY

11/01/2019

DATE OF VIOLATION

NAME Central Coast Agriculture PHONE (818) 317-8414

ADDRESS 1201 W. Chestnut Avenue, Lompoc, CA 93436

LOCATION OF VIOLATION same as above

FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTION 42300  
OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATION OF  
DISTRICT RULE(S): 201

BY:

operating cannabis extraction, storage and distribution facilities without the benefit of District permits.

Served to: Lindsay Cokeley By: Sage Swain

Title: Compliance Supervisor Title: AQ Specialist, Compliance Division

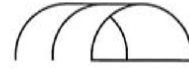
Sent Via Electronic Mail # Lindsay@ccagriculture.com Date: October 26, 2020

ENF-75 (09/21/2011)

Aeron Arlin Genet, Air Pollution Control Officer

805.961.8800 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 ourair.org @OurAirSBC

APCD EXH. 2 0004



85 W Hwy 246 #233, Buellton CA 93427

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TELEPHONE: 818.317.8414  
E-MAIL: [lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)

November 4, 2020

Sage Swain  
Air Quality Specialist – Compliance Division  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110  
Via email: [swains@sbapcd.org](mailto:swains@sbapcd.org)

**Re: Response to SBCAPCD NOVs 12587 and 12589**

Dear Mr. Swain,

This letter is in response to the email received October 26, 2020 regarding the subject Notices of Violation of District Rule 201 and District Rule 206. Corrective actions for each NOV have been outlined below.

Corrective Action Plan for NOV 12589

Condition 5 of the ATC/PTO 15344 requires a start-up notification within 14 days of initial equipment operation. The permitted emergency standby generator was installed on August 8, 2019. The generator arrived with one hour on its meter, and the generator was run for less than one hour as an initial start up test for less than 1 hour. This letter shall serve as the notification of initial equipment operation.

At an inspection on October 7, 2020 it was disclosed by Eric Kett that the generator did not have a permit on file. On October 16, 2020 during a phone conversation, Sage Swain disclosed that a permit was found for the generator. However, no annual report has been submitted pursuant to Condition 5 of the ATC/PTO 15344. Attached to this letter is the annual report (Form enf-92) for the 2019 calendar year.

Corrective Action Plan for NOV 12587

The District has recently begun permitting cannabis manufacturing facilities within Santa Barbara County. An APCD advisory published in May of 2019 stated that cannabis manufacturing facilities *may* be required to obtain APCD permits. In January 2020, the APCD released Form 104, the Cannabis Product Manufacturing, Distribution and Storage Application. In July of 2020, less than four months ago, the APCD issued the "Cannabis Permitting Requirements & Nuisance Enforcement" document.

Our company was one of the first applicants for a manufacturing and distribution license to the City of Lompoc. We received our Commercial Cannabis Use License in December of 2018, after nearly a year of review by the City of Lompoc. After review by the City, our facility underwent the tedious process of review by both the Bureau of Cannabis Control and the California Department of Public Health to receive cannabis licenses for manufacturing and distribution. Around the same time, CCA applied for permits with the APCD for our proposed emergency backup generator. We received occupancy in the Chestnut facility in October 2019, and it was at that point we were then able to begin cannabis operations in

Sage Swain  
Response to Notice of Violation  
Page 2

November of 2019. At no point during the two year long permitting process were we informed by the City of Lompoc, the state of CA, or the District that we needed to obtain a District permit to operate a cannabis manufacturing facility.

After viewing the "Cannabis Permitting Requirements & Nuisance Enforcement" document in August of 2020, I reached out to the APCD to determine whether permits would be required for existing facilities within the City of Lompoc or if the District had reviewed our cannabis application during the City permitting evaluation in 2018 or 2019. Eventually, I was able to get contact information for William Saraff who referred me to Kevin Brown in early September. I spoke to Kevin Brown via telephone on September 9, and it was at that time he informed me that our facility would need to obtain a District permit due to the fact that we were operating a cannabis manufacturing facility within the City of Lompoc, and he referred me to the District's website to fill out Form 104.

On October 1, 2020 Sage Swain attempted to view our facility located at 1201 W Chestnut Ave. Due to the fact that I was unable to meet him on site, and our state licensing requires an employee escort for all visitors, we scheduled a tour for Sage Swain and Eric Kett on October 7, 2020. In response to the site visit, this violation was issued.

We have been working with outside consulting agencies to complete Form 104 since we first learned of the process back in September. We intend to have Form 104 completed by next week and will then work with District Engineers to obtain a permit for our cannabis manufacturing, distribution and storage facility.

We appreciate the District's feedback on our facility and are hoping to receive a permit in a timely manner in order to keep our operations fully compliant with all City, State, and County rules and regulations. We appreciate your patience and understanding in the delays for applying for a District permit. To date, we have made our best efforts to stay up to date and in compliance with all of the regulatory requirements that come along, as a part of being a fully legal and compliant cannabis operator within the County of Santa Barbara.

Thank you,



Lindsay Cokeley

Compliance Supervisor

Attachments

Form enf-92 for reporting year 2019



air pollution control district  
SANTA BARBARA COUNTY

## Inspection Report ENF - 11

Santa Barbara County Air Pollution Control District  
260-A N San Antonio Rd, Santa Barbara, CA 93110

Inspection Information					
Inspector		Date	07/08/2021	Time	11:00 - 12:00
Category	Permitted Facility		Type	Reinspection	Announced
NOV No	Rule Violated				
General Information					
SSID	11415	FID	11664	Inspection #	52095
Permit(s)	ATC/PTO 15344 :: E/S Diesel Generator				
Facility	Central Coast Agriculture - 1201 W Chestnut Ave.				
Company	Central Coast Agriculture				
Contact	Lindsay Cokeley		Telephone #		
Facility Address	1201 W. Chestnut Avenue				
City	Lompoc	State	CA	Zip	93436



**Comments**

This inspection was conducted concurrently with the inspection of the adjacent facility, FID 11767, in order to verify the current status of equipment requiring District permits at Central Coast Agriculture (CCA) facilities. It was pre-arranged with CCA's compliance supervisor, Lindsay Cokeley.

Since I had never been to the site, I asked Ms. Cokeley for a facility overview and walk through. She complied. Before entering the facility I asked to inspect the large emergency/standby diesel internal combustion engine (E/S DICE) outside of the facility (Device 393289 permitted by ATC/PTO 15344) with a serial number of PW300770. The non-resettable engine hour meter showed 15.9 hours. The last hour meter reading, taken during Inspector Sage Swain's inspection of the facility in October of 2020, was 13.3 hours.

After inspecting the E/S DICE, we entered the facility, where Ms. Cokeley walked me through the process [REDACTED].

[REDACTED] Ms. Cokeley confirmed that this processing facility [REDACTED]. Of note is that the processing activities at this facility fall under the purview of ATC 15634, for which the permit application was deemed incomplete on March 12, 2021. No final authority to construct or permit has been issued, and as such this facility continues to operate without a District permit. NOVs 12587 and 12589 were issued by Inspector Swain on October 26, 2020 for installation and operation of equipment without a District permit at this facility.

Due to the potential for encountering proprietary and trade secret information at this facility as noted by Ms. Cokeley upon entering the facility, I took limited photos and requested permission prior to taking any photographs at the facility.

Solvents are used throughout the facility and during various stages of the manufacturing process. Ms. Cokeley noted that the blend of solvents used in the extraction phase was proprietary. All solvent containers observed onsite were closed and properly stored in flammable cabinets when not in use. I observed two 55 gallon hazardous waste drums, one of which was outfitted with a funnel and lid and labeled ethanol washout, and another for solvent-laden rags. Both drums were sealed and properly labeled. Ms. Cokeley stated that the facility reused [REDACTED] onsite and planned to incorporate a Solvent Recovery Plan into their permit. Hazardous waste disposal is handled by a company called Gaiaca per Ms. Cokeley.

The solvent extraction system, per Ms. Cokeley, is outfitted with a two-stage cold trap and carbon filtration system in order to reduce emissions of Reactive Organic Compounds (ROC)s. There was no detectable odor outside the facility.

Ms. Cokeley stated that all equipment onsite was included in the application for ATC 15634. The initial inspection photos taken by Inspector Swain appear to corroborate this claim.

No additional violations were documented during my inspection. For more information, please refer to Attachment 1: Engine Photos.

Engineering Notes  
ESN for Device 3932889 is PW300770

Completed by		Date	08/10/2021
Reviewed by	Eric Kett	Date	04/18/2022





Above: Facility overview showing location of Device 3932889

Below: Engine overview



Attachment   1    
Page   1   of   1  



Above: Engine hour meter

Below: Engine nameplate





air pollution control district  
SANTA BARBARA COUNTY

## Inspection Report ENF - 11

Santa Barbara County Air Pollution Control District  
260-A N San Antonio Rd, Santa Barbara, CA 93110

Inspection Information						
Inspector	Marina Lupini	Date	12/10/2021	Time	10:00	11:00
Category	Permitted Facility	Type	Routine	Announced	Yes	
NOV No	Rule Violated					
General Information						
SSID	11415	FID	11664	Inspection #	52361	
Permit(s)	ATC 15634 :: Cannabis, ATC/PTO Mod 15344 01 :: E/S Diesel Generator					
Facility	Central Coast Agriculture - 1201 W Chestnut Ave.					
Company	Central Coast Agriculture					
Contact	Lindsay Cokeley	Telephone #				
Facility Address	1201 W. Chestnut Avenue					
City	Lompoc	State	CA	Zip	93436	
Comments						



This routine inspection was pre-announced due to the secure nature of the cannabis processing facility. It should be noted that NOV 12587 was issued 10/26/2020 for operation of this facility without a permit and the facility has not yet returned to compliance due to the final permit not having been issued at the time of inspection.

I arrived at 9:30 AM and met Lindsay Cokeley, Central Coast Agriculture (CCA)'s director of compliance. Ms. Cokeley escorted me throughout the facility during my inspection. First, we entered the building, where I asked her about any changes since my last inspection (Inspection 52095). Ms. Cokeley informed me that Extraction Booth 2 was currently offline and the space being used for storage, and that an additional extraction booth, Booth 4, was being built and was slated to be double the size of the existing extraction booths. Ms. Cokeley informed me that the Engineering Division was aware of the proposed addition to permitted equipment, which I confirmed with District Engineer Kevin Brown on December 22.

The other two extraction booths at the facility, Booth 1 and Booth 3, were operational during my inspection. I viewed the process from outside the window, but was unable to enter due to safety concerns and Ms. Cokeley requested that I not photograph the extraction equipment. Ms. Cokeley informed me that Booth 3 was on a "closed loop system" and was not yet connected to the cold trap system. Booth 1 was operating in the same manner as observed during my last inspection.

I observed three flammable cabinets in the facility and requested that Ms. Cokeley open them so I could view the contents. Two cabinets contained two 55 gallon washout drums, which were sealed during my inspection. One cabinet contained various solvents and chemicals. All ROC containing materials were sealed. I asked Ms. Cokeley about solvent cleaning at the facility; she showed me the packaging area, where employees used squeeze bottles of isopropyl alcohol (IPA) and solvent wipes containing [REDACTED] to clean cannabis oil from small containers being packaged for sale. These wipes were then placed in a sealed solvent wipe flammable can.

Next, we proceeded to the outdoor area of the facility to inspect the engine permitted to operate by ATC/PTO Mod 15344 01. The engine hour meter read 15.9 hours at the time of my inspection. No exceedances of permitted maintenance and testing limitations were noted.

After inspecting the backup generator, I asked Ms. Cokeley to escort me to the solvent and hazardous waste storage areas outside of the facility. The solvent storage area is adjacent to the 1201 Laurel Ave. building (FID 11767) and is enclosed by a chain link fence. CCA's proprietary blend of solvents used in extraction is stored in this area [REDACTED]. Across from the solvent storage area are several enclosed hazardous materials storage containers. One of these containers contained a hazardous waste drum which was labeled with a start date of 12-1-2021. Ms. Cokeley explained that the solvent laden wipes were transferred here from the cans I observed in the packaging area. The other hazardous materials storage container I observed contained 15 55-gallon drums containing [REDACTED]. All drums I observed were appropriately sealed during my inspection.

After discussion with Compliance Supervisor Eric Kett and District Engineer Kevin Brown, I sent a Request for Information (RFI) to Ms. Cokeley on 12-22-2021 in order to ascertain how much raw cannabis was being processed at the facility per day and how much solvent was being used in that process. This information will be included in required recordkeeping upon issuance of the facility's permit and will provide insight into the facility's emissions while they remain out of compliance. The RFI response is due by 01-07-2022 and will be added to the facility file upon receipt.

Although this facility has not yet returned to compliance for the violations noted in NOV 12587, no additional violations were observed during my inspection. Installation of additional equipment prior to issuance of a District permit may result in further enforcement action at that time.

Attachment 1: Inspection Photos (Please note that due to the proprietary equipment onsite I was asked not to photograph several areas within the facility).

Engineering Notes



air pollution control district  
SANTA BARBARA COUNTY

## Inspection Report ENF - 11

Santa Barbara County Air Pollution Control District  
260-A N San Antonio Rd, Santa Barbara, CA 93110

Completed by	Marina Lupini	Date	12/22/2021
Reviewed by	Eric Kett	Date	05/11/2022



SENT VIA ELECTRONIC MAIL (lindsay@ccagriculture.com)  
READ RECEIPT OR REPLY E-MAIL REQUESTED

December 22, 2021

Central Coast Agriculture, LLC  
Attn: Lindsay Cokeley  
85 W. Highway 246, #233  
Buellton, CA 93427

Subject: Request for Information Form

Dear Ms. Cokeley,

Please see the enclosed Request for Information form pursuant to my inspections of Central Coast Agriculture's facility at 1201 West Chestnut Avenue (FID 11664) in Lompoc, performed on December 10, 2021. As described within the enclosed form, please provide the requested information by the close of business (5:00pm) on January 7, 2022. An e-mail response ([LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)) is preferred.

If you should have any questions, please do not hesitate to contact me at (805) 614-6792.

Sincerely,

Marina Lupini  
Air Quality Specialist  
Compliance Division

Enclosures: Request for Information

CC: 1201 W. Chestnut Ave. (FID 11664) facility file

[Aeron Arlin Genet](#), Air Pollution Control Officer

805.961.8800 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 [ourair.org](http://ourair.org) [@OurAirSBC](https://www.facebook.com/OurAirSBC)

APCD EXH. 2 0013

## REQUEST FOR INFORMATION

Name: Central Coast Agriculture, LLC

Address: 85 W. Hwy 246, #233, Buellton, CA 93427

Location of Equipment: 1201 W. Chestnut Ave, Lompoc, CA (FID 11664)

Request Given to: Ms. Lindsay Cokeley

Section 42303 of the California Health and Safety Code authorizes the Santa Barbara County Air Pollution Control District to require the applicant for, or holder of, any permit provided for by the regulations of the District board, to provide:

“...such information, analyses, plans, or specifications which will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by the source for which the permit was issued or applied.”

Your facility was recently inspected by a representative of the Santa Barbara County APCD. As a result of this inspection and pursuant to the above cited Section, the following information is required:

1. The amount of raw cannabis plant material processed at the facility on a monthly basis, for each month from the commencement of operations (November 2019) to December 2021; and, if possible, the amount of raw cannabis plant material processed by [REDACTED] at the facility during that timeframe;
2. Purchase records for all solvent materials containing ROCs including, but not limited to, [REDACTED].
3. The amount of make-up solvent transferred to each extraction tank, if such records exist.

Please provide this information by close of business (5:00pm) January 7, 2022 to the inspector who signed this request at 301 East Cook St, Suite L, Santa Maria, CA 93454 or by e-mail (preferred) at [LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org).

**Please that the operation of any equipment requiring a District permit without a final Authority to Construct or District Permit is a violation of District Rule 201 and Section 42300 of the California Health and Safety Code. Each day or portion of a day in which a violation occurs may be considered a separate violation.**

By: Marina E. Lupini, Air Quality Specialist

Date: December 22, 2021

**From:** Marina E. Lupini  
**Sent:** Thursday, January 13, 2022 2:58 PM  
**To:** Lindsay Cokeley <lindsay@ccagriculture.com>  
**Subject:** RE: Request for Information Attached

Lindsay,

Thank you for working to get this information together. We will extend the due date to COB 1/21/22.  
Please don't hesitate to reach out with any questions or concerns.



**Marina Lupini**

Air Quality Specialist  
Compliance Division  
Air Pollution Control District  
Santa Barbara County

[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)

(805) 614-6792 (office)

(804) 652-9199 (mobile)

[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

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**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>  
**Sent:** Thursday, January 13, 2022 1:43 PM  
**To:** Marina E. Lupini <[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)>  
**Subject:** Re: Request for Information Attached

Hi Marina,

Apologies for the lack of my reply, we've been diligently working on the request and would definitely appreciate the extension.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

[ccagriculture.com](http://ccagriculture.com)

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Sent from my mobile device, please excuse typos

On Thu, Jan 13, 2022, 1:17 PM Marina E. Lupini <[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)> wrote:

Hi Lindsay,

I just wanted to check in with you since I hadn't received a reply. I have gotten permission from Kaitlin McNally to extend the deadline for the RFI another week, if that's helpful. Please let me know if that works for you.

Best,



**Marina Lupini**

Air Quality Specialist  
Compliance Division  
Air Pollution Control District  
Santa Barbara County



[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)  
(805) 614-6792 (office)  
(804) 652-9199 (mobile)

[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

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**From:** Marina E. Lupini  
**Sent:** Tuesday, January 4, 2022 11:22 AM  
**To:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>  
**Subject:** RE: Request for Information Attached

Hi Lindsay,

Thank you for getting back to me. I am unable to extend the Request for Information due date to the extent requested, but the District has agreed to extend the due date one week (until COB 1/14/2022).

I also noticed a typo on the second page of that document which I want to correct: the last sentence should read "Please *be advised* that the operation of any equipment requiring a District permit without a final Authority to Construct or District Permit is a violation of District Rule 201 and Section 42300 of the California Health and Safety Code. Each day or portion of a day in which a violation occurs may be considered a separate violation."

Respectfully,



**Marina Lupini**

Air Quality Specialist  
Compliance Division  
Air Pollution Control District  
Santa Barbara County

[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)  
(805) 614-6792 (office)  
(804) 652-9199 (mobile)

[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

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**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

**Sent:** Monday, January 3, 2022 4:07 PM

**To:** Marina E. Lupini <[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)>

**Subject:** Re: Request for Information Attached

Hi Marina,

I was out all last week and most of our team is still on vacation this week due to the holidays. Please let me know if we can request additional time to respond to this request for information. We can provide the information requested by January 30, 2022 if accepted by the District.

Thank you,

**Lindsay Cokeley**

Director, Compliance | CCA

On Wed, Dec 22, 2021 at 4:23 PM Marina E. Lupini <[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)> wrote:

Hi Lindsay,

Thanks for facilitating my inspection of the Chestnut Ave. facility the Friday before last. Please see attached a Request for Information pursuant to that inspection. Please feel free to reach out with any questions or concerns. I am out of the office tomorrow and will return January 3 so there may be a delay in response.

Happy Holidays,



**Marina Lupini**

Air Quality Specialist  
Compliance Division  
Air Pollution Control District  
Santa Barbara County

[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)

(805) 614-6792 (office)  
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[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

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Noah Perch-Ahern

D: 310.201.7484  
F: 310.553.0687  
NPerchAhern@ggfirm.com

January 21, 2022

**CONFIDENTIAL COMMUNICATION REGARDING  
REQUEST FOR INFORMATION**

Via E-Mail [LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)

Marina Lupini  
Santa Barbara County Air Pollution Control District  
301 East Cook St, Suite L  
Santa Maria, CA 93454

Re: Request for Information - 1201 W. Chestnut Ave., Lompoc, CA

Dear Ms. Lupini,

This message responds to the Request for Information (“RFI”) that you sent to Central Coast Agriculture, Inc. (“CCA”) on December 22, 2022 with respect to 1201 W. Chestnut Ave, Lompoc, CA (FID 11664) (“Facility”). Pursuant to your email, dated January 13, 2022, the APCD agreed to extend the time of response until January 21, 2022.

With respect to the information provided herein, CCA invokes the confidentiality provisions of APCD Policy No. 1100.088.19, dated May 17, 2019. <https://www.ourair.org/wp-content/uploads/1100-088.pdf>. Specifically, Section D. 2. e. exempts records concerning enforcement activities from public disclosure. Further, CCA invokes the confidentiality provisions of APCD Policy & Procedure 6100-020 (Handling of Confidential Information): <http://www.ourair.org/wp-content/uploads/6100-020.pdf>, and represents the information provided herein meets the criteria of CA Govt Code Sec 6254.7. CCA requests that all records in response to the RFI and all records pertaining to the District’s enforcement activities concerning CCA be protected from public disclosure.

Subject to its invocation of the District’s confidentiality protections, and without waiving any rights, remedies, or objections, CCA responds as follows:

Request No. 1. *The amount of raw cannabis plant material processed at the facility on a monthly basis, for each month from the commencement of operations (November 2019) to December 2021; and, if possible, the amount of raw cannabis plant material processed by [REDACTED] at the facility during that timeframe;*

- [REDACTED]

[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
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[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

Request No. 2. *Purchase records for all solvent materials containing ROCs including, but not limited to,* [REDACTED]

- [REDACTED]

Request No. 3. *The amount of make-up solvent transferred to each extraction tank, if such records exist.*

- [REDACTED]

Please note that CCA is also compiling certain information responsive to the RFI in connection with a request from the District concerning CCA's cannabis manufacturing license application for the Facility. Because CCA has not been required to track much of the requested information, the data collection and computation process has been burdensome. CCA is diligently collecting all responsive information necessary to assure that the information provided is accurate. CCA expects to have further responsive information to share with the District within two to four weeks, i.e. no later than February 18, 2021.

In closing, CCA reserves all of its rights and remedies concerning this matter, and specifically reserves all objections to the information requests and the responses above, including but not limited to all evidentiary objections, objections concerning the form of the informational requests, and arguments concerning any requirements to disclose information in connection with

Marina Lupini  
January 21, 2022  
Page 4

**CONFIDENTIAL COMMUNICATION REGARDING  
REQUEST FOR INFORMATION**

the RFI. The foregoing response is subject to modification consistent with CCA's continuing investigation and review.

Sincerely,



Noah Perch-Ahern

NP/sl

**From:** [Kaitlin E. McNally](#)  
**To:** [Lindsay Cokeley](#)  
**Cc:** [David I. Harris](#)  
**Subject:** RE: Call  
**Date:** Friday, February 25, 2022 11:11:00 AM

---

Hi Lindsay,

I'm emailing to follow up on your questions from our meeting last Friday. I had a chance to check with our Engineering Division, and they agreed that it would be helpful to receive the information you have in response to the last ATC 15634 incompleteness letter, even if it doesn't address everything. So please go ahead and submit that as soon as you are ready to.

As for the violation (NOV 12587) for operating cannabis manufacturing, distribution and storage facilities located at 1201 W. Chestnut in Lompoc without a District permit, the violation has not been complied with, and each day or portion of a day in which the violation continues is considered a separate violation. As I stated in our phone call, you may comply with this violation by stopping operations until you receive a final District permit. Just reducing the emissions does not constitute compliance with the violation, however it would be taken into consideration when negotiating the civil penalties for the violation. We would need to see records and documentation to show that emissions were in fact reduced.

Lastly, in response to your question about installing control equipment to reduce emissions, a District permit is required before installation. I have begun conversations with our Engineering and Planning Divisions to determine if this is feasible, but I don't have an answer yet.

Regarding

Best regards,

Kaitlin



**Kaitlin McNally**  
Compliance Division Manager  
Air Pollution Control District  
Santa Barbara County

[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)  
805.979.8298

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**From:** Lindsay Cokeley <lindsay@ccagriculture.com>  
**Sent:** Thursday, February 17, 2022 11:52 AM

**To:** Kaitlin E. McNally <McNallyK@sbcapcd.org>

**Subject:** Re: Call

Okay that is correct.

Thank you,

**Lindsay Cokeley**

Director, Compliance | CCA

On Thu, Feb 17, 2022 at 11:21 AM Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)> wrote:

Hi Lindsay,

As long as there will be no CCA legal counsel on the call, then I don't need to have District Counsel attend this call and I can do 9:30 am.

Best regards,

Kaitlin



**Kaitlin McNally**

Compliance Division Manager  
Air Pollution Control District  
Santa Barbara County

[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)  
805.979.8298

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**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

**Sent:** Thursday, February 17, 2022 10:40 AM

**To:** Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)>

**Subject:** Re: Call

Hi Kaitlin,

As it turns out, Matt is not able to make this call. Does 9:30 still work?

Thank you,

**Lindsay Cokeley**



On Thu, Feb 17, 2022 at 10:01 AM Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)> wrote:

Hi Lindsay,

Thank you for letting me know. Since Matthew Allen, CCA General Counsel, will attend, we'll need District Counsel to attend. However that changes our availability for the meeting. We are instead available from 9-9:30 am tomorrow. Does that work for you?

Also, could you please provide me with a phone number or video meeting link?

Best regards,

Kaitlin



**Kaitlin McNally**

Compliance Division Manager  
Air Pollution Control District  
Santa Barbara County

[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)  
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**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

**Sent:** Wednesday, February 16, 2022 4:56 PM

**To:** Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)>

**Subject:** Re: Call

Also, those that will be on the call include myself, Steve Ward (one of my new employees), Matt Allen (whom you've met), and Laura Nuzzo (our outside consultant helping us with the permit process and BACT).

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

[ccagriculture.com](http://ccagriculture.com)

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Sent from my mobile device, please excuse typos

On Wed, Feb 16, 2022, 12:00 PM Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)> wrote:

Hi Kaitlin,

Apologies for not answering your question in my last email.

We are having some permitting delays due to new information being requested as a part of the permit application and I'd like to further understand what compliance implications there might be considering these delays and what we can do to mitigate any issues with the NOV while we are continuing to go through the permit process.

Thank you,

**Lindsay Cokeley**

Director, Compliance | CCA

On Wed, Feb 16, 2022 at 11:41 AM Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)> wrote:

Hi Lindsay,

Yes, Friday at 9:30 am works for me. Please let me know more specifically what you'd like to discuss regarding your 1201 Chestnut Ave facility, so I can be prepared, and if anyone else from CCA be on the call.

Best regards,

Kaitlin

**Kaitlin McNally**

Compliance Division Manager



Air Pollution Control District  
Santa Barbara County

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805.979.8298

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**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

**Sent:** Wednesday, February 16, 2022 11:05 AM

**To:** Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)>

**Subject:** Re: Call

Hi Kaitlin,

Sorry I was out yesterday. Does Friday at 9:30 am work?

Thank you,

**Lindsay Cokeley**

Director, Compliance | CCA

On Mon, Feb 14, 2022 at 2:37 PM Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)> wrote:

Hi Lindsay,

Yes, I'm available on the following days this week:

- Tuesday 2/15 between 2:30 pm and 4:30 pm
- Wednesday 2/16 between 9 am and 10:30 am
- Friday 2/18 between 9 am and 10:30 am

Will anyone else from CCA be on the call? Also, could you please provide me with more detail about what you'd like to discuss regarding your 1201 Chestnut Ave facility, so I can be prepared?

Best regards,

Kaitlin



**Kaitlin McNally**

Compliance Division Manager  
Air Pollution Control District  
Santa Barbara County

[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)  
805.979.8298

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**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>  
**Sent:** Monday, February 14, 2022 1:46 PM  
**To:** Kaitlin E. McNally <[McNallyK@sbcapcd.org](mailto:McNallyK@sbcapcd.org)>  
**Subject:** Call

Hi Kaitlyn,

Do you have some time available this week to schedule a call regarding our facility located at 1201 Chestnut Ave?

Thank you,



**Lindsay Cokeley**  
Director, Compliance | CCA  
(818) 317-8414  
[ccagriculture.com](http://ccagriculture.com)



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I was escorted during my inspection by Matt Allen, Central Coast Agriculture (CCA)'s legal counsel, and Andriana Villalpando, CCA's Environmental, Health, and Safety Specialist. We were accompanied by another CCA employee whose name I did not obtain.

Due to the presence of proprietary information, this company's preference is that I do not take photos inside the facility.

As noted in previous inspection reports, this building is adjacent to another building where CCA processes cannabis, 1200 W. Laurel Ave. That building was previously designated as FID 11767 within Stationary Source 11415 but will be incorporated into FID 11664 moving forward; the stationary source designation will remain the same. Operations at this facility include: solvent extraction of raw cannabis to produce cannabis extracts/cannabis oil, packaging of manufactured cannabis products, and associated solvent wipe cleaning.

[REDACTED]

Booth 3 was first observed during my inspection of the facility on December 10, 2021 (Inspection 52361).

[REDACTED] Extraction equipment observed in Booth 3 included:

[REDACTED] In her response to my June 3, 2022 request, Andriana Villalpando stated that Booth 3 was first operated on November 5, 2021, for which Notice of Violation (NOV) 12987 was issued on June 23, 2022.

Booth 4 is the newest and largest booth. The equipment in this booth was not operating during my inspection but I observed brown residue in some of the glass vessels in the booth, suggesting that it had been used for cannabis oil extraction previously. Per Andriana Villalpando in an email received on May 24, 2022, the equipment in the booth was first operated ("tested") on April 29, 2022, for which NOV 12988 was issued on June 23, 2022. Extraction equipment observed in Booth 4 included:

[REDACTED]

In addition to the extraction booths, there are two "dab labs" in the building, where finished cannabis oil is processed further to prepare for packaging and sale. Each "dab lab" is self contained and includes:

[REDACTED]

Manufactured cannabis oil is packaged for sale [REDACTED] in two other sections of the facility. As in the Laurel Ave. building, there is also some solvent wipe cleaning [REDACTED] associated with the packaging process, i.e. to remove excess cannabis oil from the outside of the packaging. Solvent wipes are disposed of in a sealed drum and processed as hazardous waste. The last hazardous waste pickup was dated May 19, 2022, according to the most recent hazardous waste manifest provided by Andriana Villalpando on June 8, 2022 per my request. All solvent containers that I observed were closed and all wipes appeared to be appropriately disposed of in sealed containers. Cleaning solvents are stored in closed jars in closed flammable cabinets. There are six refrigerated storage containers/Conex boxes inside the building for storing packaged materials.

Solvents used in the extraction process at this facility include [REDACTED]. The solvent storage area at this facility is located outside in a chain-link enclosure. [REDACTED]

Hazardous waste at the facility is stored in two portable containers equipped with spill protection. I observed seven small plastic totes of [REDACTED] and several 55 gallon drums of [REDACTED] in the first container, and a sealed drum of flammable solids in the second container. All waste was stored in closed containers and appeared to be appropriately labeled.

The Chestnut Ave. building is equipped with a Caterpillar C15 emergency/standby diesel internal combustion engine (E/S DICE) permitted to operate by ATC/PTO Mod 15344 01. The engine matched the description in the permit and in previous inspection reports. The engine log suggests that operational restrictions for allowed maintenance and testing hours were adhered to. For more information about the engine, please refer to Attachment 1, Inspection Checklist, and Attachment 2, Inspection Photos. Photos of the hour meter and engine log were taken with the permission of Matt Allen.

No cannabis extraction activities currently take place on the Laurel Ave. side of this facility; rather, processing activities in that building include the manufacturing of [REDACTED], and storage and packaging of [REDACTED] which are manufactured next door at the Chestnut Ave. building. The manufactured products are stored in several refrigerated storage containers inside the facility, which contain some packaged products ready for distribution and some products (cannabis oil and terpenes) in glass jars. There is a walk-in refrigerator dedicated to terpene storage, and I observed 11 Conex boxes for storage of manufactured products. All [REDACTED] storage containers which I observed during my inspection were sealed.

There is also some solvent wipe cleaning [REDACTED] associated with the packaging process, in which solvent wipes are used to remove excess cannabis oil from the outside of the packaging. Solvent wipes are disposed of in a sealed drum and processed as hazardous waste. The last hazardous waste pickup was dated 5-19-2022 according to the manifest provided by Andriana Villalpando per my request. All solvent containers that I observed were closed and all wipes appeared to be appropriately disposed of in sealed containers. [REDACTED] are stored in closed containers in flammable cabinets.

I observed a [REDACTED] in the facility, w [REDACTED] I also observed four [REDACTED] used for drying cannabis. Also present were two [REDACTED] brand [REDACTED] which did not display model numbers. This equipment was not onsite during my last inspection. Other than the aforementioned equipment, I did not observe any changes to equipment onsite from my previous inspection. None of the cannabis processing equipment onsite is currently permitted by the District. On June 8, 2022 I sent Matt Allen an email requesting the installation dates for the cannabis processing equipment listed above. I received a response from Andriana Villalpando on June 16, in which she stated that the [REDACTED] were installed on March 31, 2022, and the [REDACTED] was installed on May 18, 2022. NOVs 12989 and 12990 were issued on June 23, 2022 for the installation and operation of cannabis processing equipment without a District permit ([REDACTED]). Per Mr. Allen, there are no anticipated changes to operations in the Laurel Ave. side of the building at this time.

Outside the building, I observed the Caterpillar 762 horsepower engine permitted by ATC/PTO 15650 for use as an Emergency/Standby generator. The engine was installed in its permanent location on March 23, 2022 (the date of inspection), according to a followup email sent by Andriana Villalpando on March 24, 2022. However, the engine had not yet been wired to provide backup power to the facility, and without power to the unit I was unable to obtain an hour meter reading. However, I documented the engine identification information and reminded Matt and Andriana to keep records for the engine's use as required by ATC/PTO 15650 and not to exceed permitted limits for startup, maintenance and testing hours of operation. I requested permission to photograph the engine and engine plate, and was allowed to do so (Attachment 1, Inspection Photos).

**From:** [Andriana Villalpando](#)  
**To:** [Marina E. Lupini](#)  
**Cc:** [Jeanette De Luca](#); [Matthew Allen](#)  
**Subject:** 05/23 Inspection Follow-up  
**Date:** Tuesday, May 24, 2022 1:53:37 PM  
**Attachments:** [2022 Hazardous Waste Manifests.zip](#)

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Good afternoon Marina,

I hope your day has been off to a great start. I just wanted to follow up with your requests from the inspection at our 1201 W. Chestnut Facility yesterday. The responses (**in red**) are provided below.

1. Drop date of the CAT15 generator - **March 23rd, 2022**
2. Year-to-date hazardous waste manifests - **Zip file attached**
3. Equipment testing date - **April 29th, 2022**

It was nice seeing you again and if you have any questions feel free to give me a call.

Sincerely,



**Andriana Villalpando**

Environmental, Health and Safety Specialist | Central Coast Agriculture  
(951) 310-4908



**From:** [Andriana Villalpando](#)  
**To:** [Marina E. Lupini](#)  
**Cc:** [Matthew Allen](#)  
**Subject:** Re: Follow Up: APCD RFI and inspection question  
**Date:** Thursday, June 16, 2022 9:42:31 AM  
**Attachments:** [Solvent Purchase Receipt History.pdf](#)

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Good morning Marina,

I hope your day is off to a great start. I have provided our responses to your two most recent RFI in red below. I will be handling these requests moving forward, so please contact me with any additional questions or concerns.

**June 8th, 2022 RFI:**

Installation Date for equipment in Booth 3 at Chestnut Ave. facility (so I will have an installation date and operation date for that equipment)

- **November 5, 2021**

For Laurel Ave. facility:

1. Initial operation dates for cannabis processing activities (including packaging of manufactured products) and associated solvent wipe cleaning
  - **April 2020 Start of packaging products**
  - **April 2022 Start of solvent wipe cleaning**
2. Initial installation and operation dates for the following equipment onsite:
  - i. [REDACTED] - **May 18, 2022**
  - ii. [REDACTED] (4) - **March 31, 2022**
  - iii. [REDACTED] brand [REDACTED] (2) - **March 31, 2022**

**May 11th, 2022 RFI:**

Item 2: Purchase records for all solvent materials containing ROCs including, but not limited, to, [REDACTED]

- The District has not yet received the requested purchase records. The incompleteness response letter includes an estimate of historical solvent use but does not include solvent purchase records.
- **See attachment “Solvent Purchase\_Receipt History” for solvent purchase records. This summary includes the total amount of solvent that was vendor invoiced starting in 2021. The sheet was derived from CCA’s Enterprise Resource Planning (ERP) software, Sage, which was implemented beginning in January 2021. These are the accessible and most up-to-date records on file.**

Item 3: The amount of makeup solvent transferred to each extraction tank, if such records exist.

- The preliminary response indicated that CCA does not track makeup solvent; however, on Page 3 of 7 of the Cannabis Product Manufacturing, Distribution and

Storage Application Form (Form-104), CCA provided the following explanation of how the amount of makeup solvent transferred to the extractors will be monitored and recorded: “We monitor batch weights throughout the extraction process. There is a solvent check out protocol where all makeup solvent is weighed and checked out prior to use”. Could you please clarify whether that process is currently used, or will be implemented upon issuance of a final permit to operate?

- This process is currently being developed and fine-tuned to reflect permitting requirements. In preparation for demonstration of compliance, this is being enforced internally and will be fully utilized upon issuance of a final permit.

Sincerely,



**Andriana Villalpando**

Environmental, Health and Safety Specialist | Central Coast Agriculture  
(951) 310-4908

----- Forwarded message -----

From: **Marina E. Lupini** <[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)>

Date: Wed, Jun 8, 2022 at 3:12 PM

Subject: RE: Follow Up: APCD RFI and inspection question

To: Matthew Allen <[matthew@ccagriculture.com](mailto:matthew@ccagriculture.com)>

Hi Matt,

I wanted to add a few additional items to my request for information, but thought I'd keep it within the same email thread for organizational purposes:

1. Installation Date for equipment in Booth 3 at Chestnut Ave. facility (so I will have an installation date and operation date for that equipment)
2. For Laurel Ave. facility:
  - a. Initial operation dates for cannabis processing activities (including packaging of manufactured products) and associated solvent wipe cleaning;
  - b. Initial installation and operation dates for the following equipment onsite:
    - i. [REDACTED]
    - ii. [REDACTED] (4)
    - iii. [REDACTED] brand [REDACTED] (2)

Thank you in advance for providing a timely response and/or an update regarding the status of obtaining requested information,



**Marina Lupini**

Air Quality Specialist

Compliance Division  
Air Pollution Control District  
Santa Barbara County

[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)

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(804) 652-9199 (mobile)

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**From:** Marina E. Lupini  
**Sent:** Friday, June 3, 2022 4:31 PM  
**To:** Matthew Allen <[matthew@ccagriculture.com](mailto:matthew@ccagriculture.com)>  
**Subject:** Follow Up: APCD RFI and inspection question

Good afternoon Matt,

I just wanted to follow up on my email below. Could you please provide an update as to where you are in regards to obtaining the requested information?

I do have an additional follow up question with regards to timelines for equipment installation. I understand that the facility began operations in November of 2019 and at that time there were two extraction booths present. Andriana provided the date on which the

equipment in the fourth extraction booth was initially operated (tested) in her follow up email last week. Could you please provide the date on which the extraction equipment in Booth 3 was first operated?

Thank you in advance for your time. As always, please do not hesitate to contact me with any additional questions.

Best,

Marina Lupini

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**From:** Marina E. Lupini  
**Sent:** Wednesday, May 11, 2022 4:57 PM  
**To:** Matthew Allen <[matthew@ccagriculture.com](mailto:matthew@ccagriculture.com)>  
**Cc:** Steve Ward <[steve@ccagriculture.com](mailto:steve@ccagriculture.com)>; Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>  
**Subject:** RE: 1201 Chestnut APCD application

Good afternoon Matt,

Thank you for your email. I have had a chance to review the incompleteness response which you provided to the District's Engineering Division, and am still missing the following information from the last RFI which I sent on December 22, 2022, and to which I received a preliminary response on January 21, 2022:

Item 2: Purchase records for all solvent materials containing ROCs including, but not limited, to, [REDACTED]

- The District has not yet received the requested purchase records. The incompleteness response letter includes an estimate of historical solvent use but does not include solvent purchase records.

Item 3: The amount of makeup solvent transferred to each extraction tank, if such records exist.

- The preliminary response indicated that CCA does not track makeup solvent; however, on Page 3 of 7 of the Cannabis Product Manufacturing, Distribution and Storage Application Form (Form-104), CCA provided the following explanation of how the amount of makeup solvent transferred to the extractors will be monitored and recorded: “We monitor batch weights throughout the extraction process. There is a solvent check out protocol where all makeup solvent is weighed and checked out prior to use”. Could you please clarify whether that process is currently used, or will be implemented upon issuance of a final permit to operate?

Please let me know if you require additional clarification on any of the items above.

Respectfully,



**Marina Lupini**

Air Quality Specialist

Compliance Division  
Air Pollution Control District  
Santa Barbara County

[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)

(805) 979-8305 (office, *please note new number*)

(804) 652-9199 (mobile)

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**From:** Matthew Allen <[matthew@ccagriculture.com](mailto:matthew@ccagriculture.com)>

**Sent:** Thursday, May 5, 2022 1:08 PM

**To:** Marina E. Lupini <[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)>

**Cc:** Steve Ward <[steve@ccagriculture.com](mailto:steve@ccagriculture.com)>; Laura Nuzzo

<[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>

**Subject:** Fwd: 1201 Chestnut APCD application

Marina: Because it is not clear how much the two sides of the APCD are in contact, I am copying this to you. I know that you sent some RFIs to us looking for similar information about our purchase records for solvent. As you know, Lindsay is out on leave right now, if you are still looking for further information, can you resend the request to me for the specific information that you are missing, otherwise I will assume that we have fully responded at this point.

Thanks

Matt

----- Forwarded message -----

From: **Matthew Allen** <[matthew@ccagriculture.com](mailto:matthew@ccagriculture.com)>

Date: Mon, Apr 25, 2022 at 4:25 PM

Subject: Re: 1201 Chestnut APCD application

To: Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

Cc: Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>, Steve Ward <[steve@ccagriculture.com](mailto:steve@ccagriculture.com)>,

Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>

Kevin: Please find attached our response to Incomplete Authority to Construct Application 15634 letter

dated December 23, 2021. We realize that this has taken a while to turn back to you and appreciate your patience.

Thanks

Matt

On Thu, Nov 19, 2020 at 12:09 PM Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)> wrote:

Hi Kevin,

The check for the fees should be going out in the mail today. Here is a revised Form-01 that has not been redacted that does not contain confidential information.

Thank you,



**Lindsay Cokeley**

Compliance Supervisor | CCA

(818) 317-8414

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On Thu, Nov 19, 2020 at 11:02 AM Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)> wrote:

Lindsay,

Appreciate the clarification on the facility location.

For the confidential redactions of the application, at a minimum, the owner and operator cannot be redacted from the permit. This information is public record. Please review the District's Policies and Procedures as well as California Government Code Section 6254.7 regarding confidential information (to confirm that the rest of the application is confidential (link: <https://www.ourair.org/wp-content/uploads/6100-020-1.pdf>)).

The District thinks that a meeting via Team or Zoom would be helpful so we can get on the same page regarding the confidential information and how that affects the permitting process. Let me know if you are open to having this meeting and I'll set one up.

Please note that the permit application has been deemed incomplete for the time since we are waiting for the application fee to arrive. When we receive that fee and, if needed, have a meeting regarding the confidential information, I will do a full review of

the permit application.



**Kevin Brown**

Air Quality Engineer III  
Air Pollution Control District  
Santa Barbara County

[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)

Office: (805) 961-8826

Cell: (858) 776-7045

[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

[Sign Up for Air Alerts](#)

**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

**Sent:** Wednesday, November 18, 2020 2:33 PM

**To:** Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>

**Subject:** 1201 Chestnut APCD application

Hi Kevin,

I received your call on Monday - just wanting to touch base with you on the application. You are correct in that there is already a Facility ID for the 1201 Chestnut location - this was created when we applied for an emergency backup generator for the building. Also, are there specific parts of the application that cannot be redacted? I'm happy to unredact items that are in Form-01, however the majority of form 104 and any associated attachments we consider to be proprietary and do not want to be subject to public record. Let me know if you have any further questions.

Thank you,





**Lindsay Cokeley**

Compliance Supervisor | CCA

(818) 317-8414

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--

**Matthew Allen**

General Counsel | CCA

(805) 286 – 8764

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**Matthew Allen**

General Counsel | CCA

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**Matthew Allen**

General Counsel | CCA

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Sent via Electronic Mail to andriana@ccagriculture.com; Read Receipt Requested

June 24, 2022

Andriana Villalpando  
Central Coast Agriculture, Inc.  
85 W. Hwy 246 #233  
Buellton, CA 93427

FID: 11664  
Permit: N/A  
SSID: 11415

Re: Notices of Violation 12987, 12988, 12989, 12990

Dear Andriana Villalpando:

Enclosed you will find Notices of Violation (NOV) 12987, 12988, 12989, and 12990 documenting violations of District Rule 201 which were discovered during my inspection of the cannabis processing facilities at 1201 W. Chestnut Ave. and 1200 W. Laurel Ave. in Lompoc, on May 23, 2022, and during my review of follow-up information you provided, per my request, via e-mail on May 24, 2022 and June 16, 2022. Rule 201 was violated by the installation and operation of cannabis processing equipment without the benefit of a District permit; specifically:

1. 12 [REDACTED], 12 [REDACTED], six [REDACTED], and two [REDACTED] in Extraction Booth Three in the building at 1201 W. Chestnut Ave, installed and operated on November 5, 2021;
2. Two [REDACTED], one [REDACTED], and one [REDACTED] contained within Extraction Booth Four in the building at 1201 W. Chestnut Ave, installed and operated on April 29, 2022;
3. Four [REDACTED] and one [REDACTED] in the building at 1200 W. Laurel Ave, installed and operated on March 31, 2022;
4. One [REDACTED] in the building at 1200 W. Laurel Ave, installed and operated on May 18, 2022.

Please note that each day or portion of a day in which a violation occurs may be considered a separate violation. In addition, the installation and operation of these unpermitted pieces of equipment is considered a willful and knowing violation of District regulations. Please email an NOV response, including a signed copy of the enclosed NOV, to [LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org) within 10 business days of receipt. Alternatively, an NOV response may be mailed to my attention at: 301 E. Cook St, Ste. L, Santa Maria, CA 93454. You may sign anywhere on the enclosed NOV form. You will receive a separate letter from Mutual Settlement detailing the NOV resolution. Please refer to the District's Policy and Procedure regarding Mutual Settlement available at: <http://www.ourair.org/wp-content/uploads/VII.D.pdf>.

If you have any questions regarding this matter, please contact me at (805) 979-8305 or [LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org).

Sincerely,

Marina E. Lupini  
Air Quality Specialist, Compliance Division

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 | [ourair.org](http://ourair.org) | [@OurAirSBC](https://twitter.com/OurAirSBC)



air pollution control district  
SANTA BARBARA COUNTY

12987

VIOLATION NUMBER

# NOTICE OF VIOLATION

06-16-2022

DATE OF DISCOVERY

11-5-2021

DATES OF VIOLATION

NAME Central Coast Agriculture, Inc. PHONE (951) 310-4908

ADDRESS 85 W. Highway 246 #233, Buellton, CA 93427

LOCATION OF VIOLATION 1201 W. Chestnut Ave., Lompoc, CA

FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTIONS 42300  
OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATIONS OF  
DISTRICT RULE(s): 201  
BY:

*Installing and operating cannabis processing equipment without a District permit (beginning on November 5, 2022).*

Served to: Andriana Villalpando By: Marina E. Lupini

Title: EHS Specialist Title: Air Quality Specialist

Sent via Electronic Mail on: June 24, 2022 Date: June 24, 2022

ENF-75 (09/21/2011)

Central Coast Agriculture, Inc.

DocuSigned by:  
Matthew Allen  
815F48DF05DC469...  
Matthew Allen

6/30/2022 | 6:26:09 PM PDT

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 | ourair.org | @OurAirSBC



12988

VIOLETION NUMBER

# NOTICE OF VIOLATION

05-24-2022

DATE OF DISCOVERY

4-29-2022

DATES OF VIOLATION

NAME Central Coast Agriculture, Inc. PHONE (951) 310-4908  
 ADDRESS 85 W. Highway 246 #233, Buellton, CA 93427  
 LOCATION OF VIOLATION 1201 W. Chestnut Ave., Lompoc, CA  
 FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTIONS 42300  
 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
 HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATIONS OF  
 DISTRICT RULE(s): 201  
 BY:

*Installing and operating cannabis processing equipment without a District permit (beginning on April 29, 2022).*

Served to: Andriana Villalpando By: Marina E. Lupini  
 Title: EHS Specialist Title: Air Quality Specialist  
 Sent via Electronic Mail on: June 24, 2022 Date: June 24, 2022  
 ENF-75 (09/21/2011)

Central Coast Agriculture, Inc.

DocuSigned by:  
  
 815F48DF05DC469...  
 Matthew Allen

6/30/2022 | 6:26:09 PM PDT

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 | ourair.org | @OurAirSBC



12989

VIOLATION NUMBER

# NOTICE OF VIOLATION

06-16-2022

DATE OF DISCOVERY

3-31-2022

DATES OF VIOLATION

NAME Central Coast Agriculture, Inc. PHONE (951) 310-4908

ADDRESS 85 W. Highway 246 #233, Buellton, CA 93427

LOCATION OF VIOLATION 1200 W. Laurel Ave., Lompoc, CA

FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTIONS 42300  
OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATIONS OF  
DISTRICT RULE(s): 201  
BY:

*Installing and operating cannabis processing equipment without a District permit (beginning on March 31, 2022).*

Served to: Andriana Villalpando By: Marina E. Lupini

Title: EHS Specialist Title: Air Quality Specialist

Sent via Electronic Mail on: June 24, 2022 Date: June 24, 2022

ENF-75 (09/21/2011)

Central coast Agriculture, Inc.

DocuSigned by:  
Matthew Allen  
815F48DF05DC469...  
Matthew Allen

6/30/2022 | 6:26:09 PM PDT

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 | ourair.org | @OurAirSBC



12990

VIOLATION NUMBER

# NOTICE OF VIOLATION

06-16-2022

DATE OF DISCOVERY

05-18-2022

DATES OF VIOLATION

NAME Central Coast Agriculture, Inc. PHONE (951) 310-4908

ADDRESS 85 W. Highway 246 #233, Buellton, CA 93427

LOCATION OF VIOLATION 1200 W. Laurel Ave., Lompoc, CA

FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTIONS 42300  
OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATIONS OF  
DISTRICT RULE(s): 201  
BY:

*Installing and operating cannabis processing equipment without a District permit (beginning on May 18, 2022).*

Served to: Andriana Villalpando By: Marina E. Lupini

Title: EHS Specialist Title: Air Quality Specialist

Sent via Electronic Mail on: June 24, 2022 Date: June 24, 2022

ENF-75 (09/21/2011)

Central Coast Agriculture, Inc.

DocuSigned by:  
Matthew Allen  
815F48DF05DC469...  
Matthew Allen

6/30/2022 | 6:26:09 PM PDT

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 | ourair.org | @OurAirSBC

Note: This facility has categorized themselves as a confidential source. The following report is a redacted version which has been edited to obscure potentially confidential information.

I was escorted during my inspection by Central Coast Agriculture (CCA) employees Lindsay Cokeley, Director of Compliance, and Carlos Ortuno, Process Engineer. Due to the presence of proprietary information, this company's preference is that I do not take photos inside the facility.

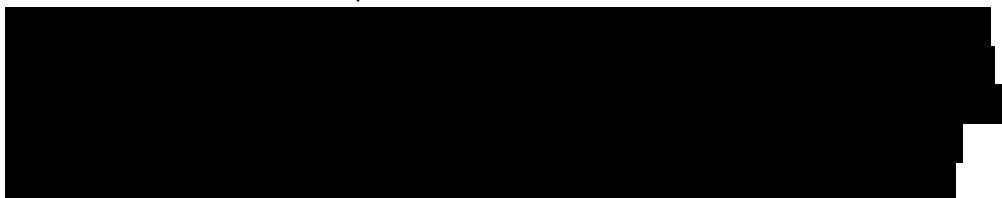
As was discussed in the previous inspection report (Inspection 52102), FID 11664 now encompasses both 1201 W. Chestnut Ave. and 1200 W. Laurel Ave. This inspection focused primarily on the Chestnut Ave. facility since cannabis manufacturing processes are limited in the Laurel building, which is mostly being used for storage and packaging of cannabis products.

Operations at the facility include volatile and non-volatile extraction of raw cannabis to produce cannabis extracts/cannabis oil, packaging of manufactured cannabis products, and associated solvent wipe cleaning. Though the facility first applied for a permit in 2019, the source withdrew the initial application and the current application has not yet been deemed complete by District Engineering staff. As such, all of the cannabis processing and manufacturing activities at this facility are currently unpermitted and occurring in violation of District rules. Lindsay Cokeley stated at the pre-inspection briefing that no equipment or processes had changed since what was submitted in the most recent iteration of the permit application. Lindsay was unable to comment on whether there were any changes to permitted equipment or activities onsite compared to my previous inspection, since she was away on leave during parts of 2021-2022. On June 2, 2023, following my inspection, I sent Lindsay Cokeley a Request for Information (RFI) requesting information about the installation dates for some equipment observed onsite and solvent purchase records. I received a response on June 23, 2023 (See Attachment 1- RFI and redacted RFI Response).

Changes observed to equipment and processes onsite from the previous inspection (Inspection 52102) are discussed below:

1. Emissions controls- Per Lindsay Cokeley, the facility still does not have a main emissions control device; however, each solvent extraction booth is equipped with a cold trap "closed loop" system and a carbon filter. I also observed cold trap devices in the "Dab Labs" onsite.
2. Equipment Location- The equipment onsite is often moved around, e.g. between solvent extraction booths in the Chestnut Ave. building. The location of manufacturing activities within the building is also subject to change. During my inspection, Booth 1 was being utilized for solvent recovery and distillation, Booths 2 and 3 for solvent extraction of cannabis flower, and Booth 4 for post-processing refinement, which differed from previous inspections.
3. Equipment- Equipment onsite was similar to that observed during previous inspections, with exceptions noted below. I have attempted to

a.





- [REDACTED]
- [REDACTED]
- b. Rolling machines- Three [REDACTED] rolling machines were installed after my previous inspection (on July 5, 2022 and December 2, 2022) per the RFI response provided by Lindsay Cokeley.
  - c. [REDACTED] machine- This machine, used in non-volatile cannabis extraction, was installed in September 2022 per the RFI response provided by Lindsay Cokeley. Lindsay stated during the inspection that this machine was in the R&D phase. I observed it in use during my inspection.
  - d. Removal of flow meters- During my inspection I observed flow meters onsite in the extraction booths; however Lindsay Cokeley stated in her June 23, 2023 RFI response that the flow meters were removed following my inspection because they cannot effectively measure the proprietary [REDACTED] blend the facility uses.
  - e. "Backup equipment" and related discrepancies: Note that at the beginning of my inspection I requested a list of the equipment onsite which required a District permit and for which one had been applied; I was supplied a 40 page spreadsheet which I attempted to reference during my inspection. I observed several discrepancies between the amount of equipment onsite and what was listed in the spreadsheet; Lindsay and Carlos stated that some of the equipment onsite was not installed but was kept elsewhere in storage as "backup" should the equipment onsite fail, including:
    - i. One additional [REDACTED] machine
    - ii. Two additional [REDACTED]
    - iii. Backup [REDACTED] (3 were onsite, two were not present and were described as backup)
    - iv. Backup [REDACTED] in Dab Labs- two backup [REDACTED] in addition to 3 in use onsite
    - v. [REDACTED] cold traps in Dab Lab- four were installed, two were on list as "backup"
    - vi. [REDACTED] Recirculating chiller- 3 onsite, 3 backup
    - vii. One [REDACTED] (four operating onsite, one backup)
  - f. Note: The above lists of backup equipment and equipment added since my most recent inspection should not be considered comprehensive. Several factors have contributed to the difficulty of cataloging equipment onsite: the sheer volume of equipment onsite; lack of finalized and transparent equipment list; nature of operations at the facility which entail frequent relocation of equipment throughout the facility; and my historical willingness to acquiesce to the facility's preference that I do not take photos during my inspections. Further, in her response to my Request for Information (discussed below), Lindsay Cokeley declined to provide an equipment list showing installation dates for all equipment onsite, stating that that information is not available at this time. This matter will continue to be investigated during future inspections.

4. Facility Throughput: Solvent use data, as well as the total weight of cannabis processed onsite from May 2022 (date of last inspection) through the date of this inspection was included in my inspection follow-up request for information. The information provided was compared with historical data provided to District planning staff as part of the CEQA/permitting process over the last few years.
  - a. Solvent use: Solvent use data is determined from purchase records provided by the source; with the assumption that all solvents purchased are used. The facility primarily uses a proprietary [REDACTED] for extraction, as well as significantly smaller amounts of [REDACTED] and [REDACTED] are used for post-processing refinement activities. Records suggest that the amount of solvent purchased in 2022 [REDACTED] was lower than that purchased in 2021 [REDACTED]. However, data for 2023 year to date shows that [REDACTED] lbs of solvent were purchased for the months of January-May 2023; if the solvent usage in the remainder of the year continues to follow this trend, projected usage will be nearly triple the 2022 amount.
  - b. Cannabis throughput- Cannabis biomass throughput data increased significantly from 2021 [REDACTED] to 2022 [REDACTED]
5. Conclusion: My inspection and subsequent review of the RFI response in combination with information previously provided to other District staff as part of the permitting process, suggest a significant expansion of activities at the facility from what has been observed there historically. Notices of Violation 13462, 13463, and 13464 were issued on July 25, 2023 for the installation and operation of the [REDACTED] rolling machines and [REDACTED] cryohashing machine noted above.

**From:** [Marina E. Lupini](#)  
**To:** [Lindsay Cokeley](#)  
**Subject:** Inspection follow up/Request for Information  
**Date:** Friday, June 2, 2023 2:18:00 PM

---

Good afternoon Lindsay,

Thank you for facilitating my inspection of the manufacturing facility at 1201 W. Chestnut/1200 W. Laurel earlier this week.

As discussed, I am requesting the following information:

1. Installation dates/information- Are you able to generate a version of the spreadsheet you provided which includes installation dates for all equipment onsite? If that is not possible, I need specific installation dates

on the following equipment:

- a. [REDACTED]
- b. [REDACTED] (I believe there was a total of 5 onsite)
- c. [REDACTED] equipment
- d. [REDACTED]
- e. [REDACTED] (2)
- f. [REDACTED] (2)
- g. [REDACTED]
- h. [REDACTED] and [REDACTED]/all equipment used in [REDACTED] extraction process
- i. Flow meters
  - i. Please provide information about which equipment is equipped with flow meters as well as installation dates

2. Solvent information

- a. Solvent purchase data from May 2022 through current date
- b. Solvent usage data from May 2022 through current date for all extraction and solvent cleaning activities

3. Hazardous waste manifests from May 2022 through current date

4. Throughput of cannabis processed onsite, May 2022 through current date

Thank you for providing the requested information within 10 business days. If you have any questions or concerns, please feel free to reach out.

Please be aware that having applied for a permit for equipment/ processes onsite does not mean that the operation of said equipment is compliant. Each and every day in which equipment requiring a District permit is operated without one may be considered a separate violation.

Respectfully,

**Marina Lupini**  
Air Quality Specialist



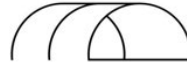
Compliance Division  
Air Pollution Control District  
Santa Barbara County

LupiniM@sbcapcd.org  
(805) 614-6792 (office)  
(804) 652-9199 (mobile)

[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

[Sign Up for Air Alerts](#)

CENTRAL COAST AGRICULTURE, INC.



85 W Hwy 246 #233, Buellton CA 93427

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TELEPHONE: 818.317.8414  
E-MAIL: [lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)

June 23, 2023

Marina E. Lupini  
Santa Barbara County Air Pollution Control District  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110

Re: Response to June 2, 2023 Request for Information

Dear Ms. Lupini,

This letter functions to provide additional information in response to the inspection that occurred on May 30, 2023 at our 1201 Chestnut/1200 Laurel Ave facility. As discussed during the inspection, in order to conduct maintenance, improve processes, or simply update old technology, equipment is often moved or replaced with back up equipment or other similar equipment with the same function. The equipment list has been refined several times at the direction and request of both the permitting and compliance departments based on changing definitions of what types of equipment need to be permitted by the district. The direction over the last 2.5 years has ranged from tables and racks used for storing cannabis, to anything that touches cannabis and has an electric motor, to anything used to control emissions (including odor) from cannabis. It is because of these changes in direction, in addition to an evolving and changing industry, that it has taken us so long to achieve compliance at this facility

We have received multiple violations at this facility for installing new equipment, however it should be noted that all processes have been a part of CCA's request for an Authority to Construct since the original ATC 15634 was submitted in November of 2020. Planning for product development often takes several months if not years to complete. Most of the equipment installed within the last year was planned for and purchased during the 2.5 year permitting process. It should be noted that the inability to make changes to our facility with a 2.5 year permitting process is not sustainable for any company, especially within the cannabis industry.

Request for Information

1. Installation Dates/Information
  - a. [REDACTED] - Installed March 2021

- b. [REDACTED] machines were purchased in 2021 and equipment shipping was delayed due to supply chain issues (only 4 in operation at any one time)
  - i. **BB1** - Installed and Operated on 10/07/2022
  - ii. **BB2** - Installed and Operated on 04/15/2022
  - iii. **BB3** - Installed and Operated on 07/05/2022
  - iv. **BB4** - Installed and Operated on 07/05/2022
  - v. **BB5** - Installed and Operated on 12/02/2022
- c. [REDACTED] #1 [REDACTED] equipment - Installed September 2022
- d. [REDACTED] - this equipment is not in operation but has been in CCA's possession since 2021 and was originally installed at one of our farming locations to mill flower post harvest. In September 2021, it was operated for approximately one month for R&D purposes at the 1201 Chestnut Facility. The grinder is no longer in operation at this facility.
- e. [REDACTED] (2) - this equipment is not in operation but has been in CCA's possession since 2019.
- f. [REDACTED] (2) - October 2021
- g. [REDACTED] - June 2020
- h. [REDACTED] and [REDACTED] /all equipment used in extraction process - We have not started utilizing [REDACTED] for extraction. [REDACTED] is utilized only in post processing refinement at this time and is used in Booth 4.
- i. **Flow meters** - All flow meters were ordered in 2020 and arrived on site for use in May 2021. There are no flow meters in use any longer since the inspection occurred on May 30th, this flow meter is not effective for measuring [REDACTED] due to different phases of the gas as it moves through the system.

2. Solvent Information

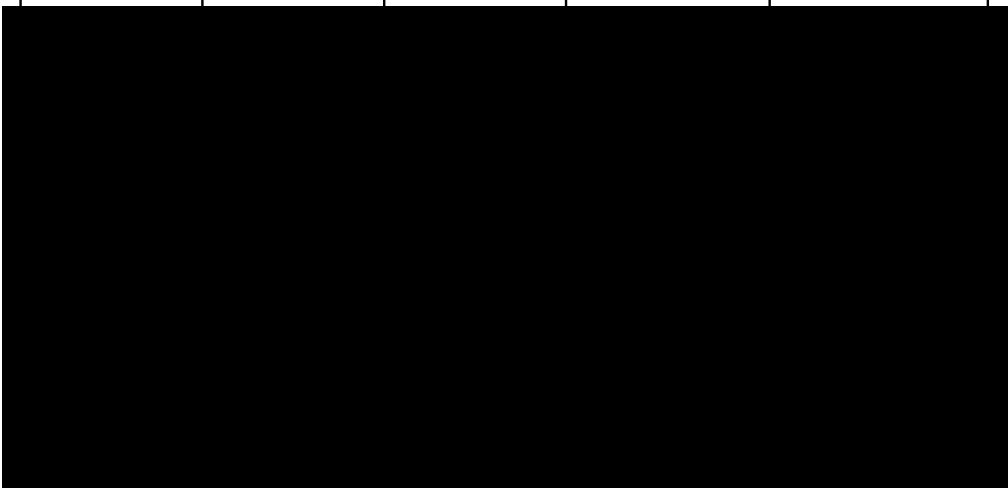
- a. Solvent purchase data from May 2022 through current date

On May 5th, 2023, solvent invoice records were emailed to the District for July 2022 through December 2022. Email is attached for reference. Invoice records for May-June 2022 and January-May 2023 are also attached.

- b. Solvent usage data from May 2022 through current date for all extraction and solvent cleaning activities

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED] (lbs.)	Total Distilled (lbs)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

■



- c. Hazardous Waste Manifests from May 2022 through current date  
See attached folder for all Hazardous Waste Manifests requested to date
- d. Throughput of cannabis processed on site, May 2022 through current date.

<b>TOTAL FLOWER PROCESSED (LBS)</b>	
-------------------------------------	--

Sincerely,  
  
Lindsay Cokeley  
Director of Compliance

Attachments:

- 1. Email May 5, 2023: Solvent Purchase Records
- 2. May 2022-June 2022 + January 2023-May 2023 Solvent Purchase Records
- 3. Hazardous Waste Manifest Records

Sent via Electronic Mail to [lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com); Read Receipt Requested

July 25, 2023

Lindsay Cokeley  
Central Coast Agriculture, Inc.  
85 W. Hwy 246 #233  
Buellton, CA 93427

FID: 11664  
Permit: N/A  
SSID: 11415

Re: Notices of Violation

Dear Lindsay Cokeley:

Enclosed you will find Notices of Violation (NOV) 13462, 13463, and 13464 documenting willful and knowing violations of District Rule 201 which were discovered during my inspection of the cannabis processing facilities at 1201 W. Chestnut Ave. in Lompoc, on May 30, 2023, and during my review of follow-up information you provided, per my request, on June 23, 2023. Rule 201 was violated by the installation and operation of cannabis processing equipment without the benefit of a District permit; specifically:

1. Two [REDACTED] machines, installed and operated on July 5, 2022 (NOV 13462);
2. One [REDACTED] machine, installed and operated in September 2022 (NOV 13463)
3. One additional [REDACTED] machine, installed and operated on December 2, 2022 (NOV 13464).

Please note that each day or portion of a day in which a violation occurs may be considered a separate violation. Please email an NOV response, including a signed copy of the enclosed NOV, to [LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org) within 10 business days of receipt. Alternatively, an NOV response may be mailed to my attention at: 301 E. Cook St, Ste. L, Santa Maria, CA 93454. You may sign anywhere on the enclosed NOV form. You will receive a separate letter from Mutual Settlement detailing the NOV resolution. Please refer to the District's Policy and Procedure regarding Mutual Settlement available at: <http://www.ourair.org/wp-content/uploads/VII.D.pdf>.

If you have any questions regarding this matter, please contact me at (805) 979-8305 or [LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org).

Sincerely,



Marina E. Lupini  
Air Quality Specialist, Compliance Division

Aeron Arlin Genet, Air Pollution Control Officer

 (805) 979-8050 |  260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 |  [ourair.org](http://ourair.org) |   @OurAirSBC





air pollution control district  
SANTA BARBARA COUNTY

13462

VIOLATION NUMBER

## NOTICE OF VIOLATION

06-23-2023

DATE OF DISCOVERY

07-05-2022

DATES OF VIOLATION

NAME Central Coast Agriculture, Inc. PHONE (951) 310-4908

ADDRESS 85 W. Highway 246 #233, Buellton, CA 93427

LOCATION OF VIOLATION 1201 W. Chestnut Ave., Lompoc, CA

FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTIONS 42300  
OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATIONS OF  
DISTRICT RULE(s): 201  
BY:

*Installing and operating cannabis processing equipment without a District permit beginning July 5, 2022.*

Served to: Lindsay Cokeley By: Marina E. Lupini

Title: Director of Compliance Title: Air Quality Specialist

Sent via Electronic Mail on: July 25, 2023 Date: July 25, 2023

ENF-75 (09/21/2011)

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050

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

ourair.org

@OurAirSBC



air pollution control district  
SANTA BARBARA COUNTY

13463

VIOLATION NUMBER

## NOTICE OF VIOLATION

06-23-2023

DATE OF DISCOVERY

09-30-2022

DATES OF VIOLATION

NAME Central Coast Agriculture, Inc. PHONE (951) 310-4908

ADDRESS 85 W. Highway 246 #233, Buellton, CA 93427

LOCATION OF VIOLATION 1201 W. Chestnut Ave., Lompoc, CA

FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTIONS 42300  
OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATIONS OF  
DISTRICT RULE(s): 201  
BY:

*Installing and operating cannabis processing equipment without a District permit (beginning on September 30, 2022).*

Served to: Lindsay Cokeley By: Marina E. Lupini

Title: Director of Compliance Title: Air Quality Specialist

Sent via Electronic Mail on: July 25, 2023 Date: July 25, 2023

ENF-75 (09/21/2011)

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050

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

ourair.org

@OurAirSBC



air pollution control district  
SANTA BARBARA COUNTY

13464

VIOLATION NUMBER

## NOTICE OF VIOLATION

06-23-2023

DATE OF DISCOVERY

12-02-2022

DATES OF VIOLATION

NAME Central Coast Agriculture, Inc. PHONE (951) 310-4908

ADDRESS 85 W. Highway 246 #233, Buellton, CA 93427

LOCATION OF VIOLATION 1200 W. Laurel Ave., Lompoc, CA

FID # 11664 PERMIT / REG / NOTIF # N/A

YOU ARE HEREBY NOTIFIED THAT PURSUANT TO SECTIONS 42300  
OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA A VIOLATION  
HAS BEEN COMMITTED THROUGH THE FOLLOWING ACT: VIOLATIONS OF  
DISTRICT RULE(S): 201  
BY:

*Installing and operating cannabis processing equipment without a District permit (beginning on December 2, 2022).*

Served to: Lindsay Cokeley By: Marina E. Lupini

Title: Director of Compliance Title: Air Quality Specialist

Sent via Electronic Mail on: July 25, 2023 Date: July 25, 2023

ENF-75 (09/21/2011)

Aeron Arlin Genet, Air Pollution Control Officer

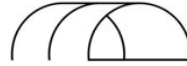
(805) 979-8050

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

ourair.org

@OurAirSBC

CENTRAL COAST AGRICULTURE, INC.



85 W Hwy 246 #233, Buellton CA 93427

---

TELEPHONE: 818.317.8414  
E-MAIL: [lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)

August 9, 2023

Marina Lupini  
Santa Barbara County Air Pollution Control District  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110

Re: Response to NOVs 12987-12990 and 13462-13464

Dear Ms. Lupini,

This letter serves to respond to four violations received on June 24, 2022, and three violations received on July 25, 2023. Please note that no formal response was sent for NOVs 12987-12990 at the time of receipt due to several circumstances including company restructuring that occurred around the time of the inspection in 2022. This letter references NOV 12587, received October 20, 2020, to which CCA has implemented a corrective action plan and has been diligently working with the District through the newly adopted cannabis permitting process.

NOV 12987

This violation was issued for 12 [REDACTED], 12 [REDACTED], 6 [REDACTED], and two [REDACTED] in Extraction Booth 3 located within the building at 1201 W Chestnut Ave. The installation date stated corresponds to the installation date of the equipment within extraction Booth 3. This equipment was previously located in Booth 2, which was decommissioned in early 2021 for repairs. This equipment was moved to Booth 3 and began operating in November of 2021 once the City signed off on its safe installation.

According to district rule 202(D)(13), “a change in location of an emission unit within the boundaries of a stationary source shall not require a permit modification unless the location of the equipment is prescribed in the source’s permit and a specific location was assumed in an air quality impact analysis or a health risk assessment that formed the basis of the issuance of the permit”. Detailed locations of the extraction equipment have not been prescribed in the permit application, and have not been requested as a part of the permit review process.

NOV 12988, 12990

NOV 12988 and 12990 were issued for equipment installed including two [REDACTED], one [REDACTED], one [REDACTED] contained within Extraction Booth 4, and one [REDACTED]. This equipment falls under the Rule 202 D(6) exemption. The emission increase from any single emission unit described in the violation does not exceed 2.4 pounds per day. The aggregate emissions for all of the equipment described in these violations do not exceed 24 pounds per day. The installation of this equipment does not require a change to any equipment used to eliminate/reduce/control the issuance of air contaminants. The equipment installed is not subject to an Airborne Toxic Control Measure adopted by the Air Resources Board, and the equipment installed is not subject to New Source Performance Standards or National Emission Standards for Hazardous Air Pollutants promulgated by the EPA or Hazardous Air Pollutant requirements under the Clean Air Act.

NOV 12989

The four [REDACTED] noted in this violation do not accurately reflect the equipment or its use. These ovens are [REDACTED] that are used to measure the [REDACTED] of finished good products to measure physical and chemical changes over time (ie. potency, color, viscosity). This equipment does not require a permit because it is not cannabis processing equipment nor does it have any associated emissions. Exemption: Rule 202 (N) (Laboratory Equipment)

NOV 13462, 13464

The use of [REDACTED] does not cause the issuance of air contaminants. The use of this equipment does not eliminate, reduce or control the issuance of air contaminants. For this reason, this equipment does not require a permit. Additionally, this equipment can be categorized as packaging and distribution equipment and falls under Rule 202 (Q) Mixing, Blending, and Packaging Equipment and Operations and Rule 202 D(6) *De minimis* exemptions.

NOV 13463

This violation was issued for a [REDACTED]. The installation date stated is associated with the installation date of the equipment within one of the storage containers located at 1201 Chestnut Ave. This equipment was previously located in Booth 2 (also located at 1201 Chestnut Ave) and was on-site during the inspection that occurred on December 10, 2021. This violation is duplicative of NOV 12587, as all of this equipment was in CCA's possession at the time of the initial inspection in October 2020. Central Coast Agriculture sent a corrective action plan for NOV 12587 on November 4, 2020, to the air quality specialist Sage Swain.

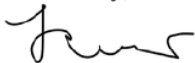
According to district rule 202(D)(13), "a change in location of an emission unit within the boundaries of a stationary source shall not require a permit modification unless the location of the equipment is prescribed in the source's permit and a specific location was

assumed in an air quality impact analysis or a health risk assessment that formed the basis of the issuance of the permit”. Detailed locations of this equipment has not been prescribed in the permit, and have not been requested as a part of the permit review process. Additionally, this equipment would also be exempt under Rule 202 D(6) *De minimis*.

As previously discussed, CCA applied for a permit to operate all extraction and post-processing equipment located at this facility in November 2020. There have been extensive delays in the permitting process due to new information that was requested by the District in the incomplete letter dated December 23, 2021. CCA was not informed of the need for a CEQA review until February 2022. These extenuating circumstances did not allow CCA to obtain a permit to operate the equipment requested in ATC 15634 within a timely manner. We believe that CCA should not be penalized for these additional delays.

According to the District NOV cover letter, each day or portion of a day in which a violation occurs may be considered a separate violation. We formally request that these NOVs be rescinded because they are duplicative of NOV 12587, and we are currently receiving daily penalties for NOV 12587 despite our best efforts to implement the corrective action plan stated in the response to NOV 12587 dated November 4, 2020.

Sincerely,



Lindsay Cokeley  
Director of Compliance

**From:** [Marina E. Lupini](#)  
**To:** [Lindsay Cokeley](#)  
**Subject:** RE: Response to NOV's  
**Date:** Thursday, August 31, 2023 12:10:00 PM  
**Attachments:** [2023-08-31-Response-to-NOV's-2023-08-27-CCRA-Response-to-NOV's.pdf](#)

---

Good afternoon Lindsay,

Please see attached the District's response to your August 9, 2023 letter.

Best,



**Marina Lupini**

Air Quality Specialist  
Compliance Division  
Air Pollution Control District  
Santa Barbara County

[LupiniM@sbcapcd.org](mailto:LupiniM@sbcapcd.org)

(805) 979-8305 (office, *please note new number*)  
(804) 652-9199 (mobile)

[ourair.org](http://ourair.org) [@OurAirSBC](#)

[Sign Up for Air Alerts](#)

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**From:** Lindsay Cokeley <lindsay@ccagriculture.com>  
**Sent:** Wednesday, August 9, 2023 4:45 PM  
**To:** Marina E. Lupini <LupiniM@sbcapcd.org>  
**Subject:** Response to NOV's

Hi Marina,

Please see the attached in response to the NOV's received July 25.

Thank you,



**Lindsay Cokeley**

Director, Compliance | CCA  
(818) 317-8414  
[ccagriculture.com](http://ccagriculture.com)



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the sender and delete this message and any attachments without copying. If you are the intended recipient but do not wish to receive communications through this medium, please so advise the sender immediately.



August 31, 2023

Lindsay Cokeley, Director of Compliance  
Central Coast Agriculture  
85 W. Hwy 246 #233  
Buellton, CA 93427

Re: August 9, 2023 Response to NOVs 12987-12990 and 13462-13464

Dear Lindsay Cokeley:

The District is in receipt of your response to Notices of Violation 12987-12990 and 13462-13464, dated August 9, 2023. At this time, the District will not be rescinding any of the aforementioned NOVAs as requested. Please see our responses below to the individual items addressed in your letter.

- NOV 12987: Rule 202.D.13 does not apply because the exemption cannot be applied to equipment which does not have a District-issued permit. However, if CCA is able to provide documentation of the dates when the equipment was first installed at the facility (e.g. invoice and/or delivery confirmation) and the dates when the equipment was first operated at the facility (e.g. logbooks) we will take that into consideration.
- NOV 12988, 12990: Rule 202.D.6 does not apply because the de minimis exemption does not apply if you have no permit. Furthermore, the de minimis exemption does not apply to new processes and/or equipment.
- NOV 12989: We do not think that the [REDACTED] qualify as laboratory equipment under the Rule 202.N laboratory equipment exemption; and we do not have enough information to verify whether your statement that the [REDACTED] have no potential to emit (PTE) is correct. Please note that this NOV encompasses the [REDACTED] as well as a [REDACTED], which you did not contest in your NOV response.
- NOV 13462, 13464: We disagree with the statement that there is no PTE from this equipment. [REDACTED] can emit air contaminants in the form of odor/terpenes. In addition, they do not qualify for the Rule 202.Q exemption because they are not “batch mixers” and cannabis does not qualify as a pharmaceutical or cosmetics, nor is the equipment used for packaging lubricants and greases, so none of the conditions for the 202.Q. exemption are met. Rule 202.D.6 does not apply because the de minimis exemption does not apply if you have no permit.



- NOV 13463: Rule 202.D.13 does not apply because the exemption cannot be applied to equipment which does not have a District-issued permit. However, if CCA is able to provide documentation of the dates when the equipment was first installed at the facility (e.g. invoice and/or delivery confirmation) and the dates when the equipment was first operated at the facility (e.g. logbooks) we will take that into consideration.

As always, we are happy to help with any questions you may have about compliance with District Rules and District permitting requirements.

Respectfully,

Marina E. Lupini  
Air Quality Specialist III, Compliance Division

**RULE 201. PERMITS REQUIRED. (Adopted 10/18/1971, revised 5/1/1972, readopted 10/23/1978, revised 7/2/1979, 4/17/1997, and 6/19/2008)**

**A. Applicability**

This rule applies to any person who builds, erects, alters, replaces, operates or uses any article, machine, equipment, or other contrivance which may cause the issuance of air contaminants.

**B. Exemptions**

Exemptions to this rule appear in Rule 202 (Exemptions to Rule 201).

**C. Definitions**

See Rule 102 for definitions not limited to this rule. For the purposes of this rule, the following definitions shall apply:

"Erect" means the setting up, installing, or assembling of equipment that can be moved from one location to another and that must be stationary in order to operate.

**D. Requirement - Authority to Construct**

Any person building, erecting, altering, replacing, or using any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, shall first obtain an Authority to Construct for such construction or use from the Control Officer. An Authority to Construct issued to a source shall remain in effect until the Permit to Operate the equipment for which the application was filed is granted or denied or the application expires.

**E. Requirement - Permit to Operate**

1. Source Compliance Demonstration Period

After issuance of an Authority to Construct and prior to issuance of a Permit to Operate, the Control Officer may require an applicant to undergo a Source Compliance Demonstration Period, to evaluate each article, machine, equipment or other contrivance listed within the Authority to Construct. The applicant must show that all of the listed equipment is so designed, controlled or equipped with such air pollution control equipment, that it may be expected to be operated in compliance with Sections 41700 or 41701 of the Health and Safety Code and these Rules and Regulations and any limitation or permit condition of the Authority to Construct.

2. Permit to Operate

Before any article, machine, equipment or other contrivance described in Rule 201(D) may be operated or used, a written permit shall be obtained from the Control Officer. No Permit to Operate or use shall be granted either by the Control Officer or the Hearing Board for any article, machine, equipment or contrivance described in Rule 201(D) constructed or installed without authorization as required by Rule 201(D) until the applicant presents such information or analysis as will disclose the nature, extent, quantity or degree of air contaminants which the source may discharge. The Control Officer may also require the same information if an article, machine, equipment or contrivance is altered or modified to conform to the standards set forth in these Rules and Regulations. Further, the Control Officer may require that the disclosures described be certified by a professional engineer registered by the State of California.

3. Consolidated Authority to Construct/Permit to Operate

The Control Officer may issue a consolidated Authority to Construct/Permit to Operate.

**F. Requirement - Expiration of Authority to Construct**

If unused, an Authority to Construct shall automatically expire one year from the date of issuance. An application for Permit to Operate existing equipment may be canceled one year from the date of filing of the application, if unused.

**G. Requirement - Permit Reissuance and Reevaluation**

A Permit to Operate shall be valid for one year and shall be eligible for extension provided the permittee is in compliance with permit conditions as determined by the District's annual compliance inspection and upon the payment of fees. The Control Officer may prohibit the reissuance of a Permit to Operate, or revise it as authorized by law, if the article, machine, equipment or contrivance subject to the permit does not comply with all applicable orders, rules and regulations of the District and CARB, and Division 26 of the Health and Safety Code, including Health and Safety Code Sections 42301(e) and (f). A Permit to Operate shall be reevaluated by the Control Officer every three years to determine that the permit conditions are adequate to ensure compliance with, and the enforceability of, District rules and regulations applicable to the source.

**H. Requirement - Notification to Officials**

The Control Officer shall notify the building department or division of every governmental agency, excluding federal agencies, within the District boundaries, on an annual basis, that the owner or authorized agent of development projects which do not require a development permit other than a building permit, will need to comply with the requirements for a permit for construction or modification from the District. In addition, to assist the County and each city to comply with Government Code Section 65850.2, the Control Officer will provide the building officials with relevant Authority to Construct permit information to be distributed to building permit applicants.

**I. Requirement - Posting of Authority to Construct or Permit to Operate**

1. A person who has been granted under this Rule an Authority to Construct or a Permit to Operate for any article, machine, equipment, or other contrivance described in Section D or E of this rule shall maintain the Authority to Construct or Permit to Operate, or an approved facsimile readily available to the District and operating personnel at all times on the operating or construction premises, or at a location disclosed to the Control Officer, and shall provide it upon request to the Control Officer or to the Control Officer's representative.
2. No person shall deface, alter, forge, counterfeit, or falsify a permit, or facsimile thereof issued or maintained pursuant to the provisions of this Rule.

**J. Requirements - Absence of Permitted Equipment**

Items of equipment, other than portable internal combustion engines which are eligible for registration pursuant to Health & Safety Code 41750 *et seq*, for which a Permit to Operate is granted, shall be at all times present within the boundaries of the stationary source unless the operator shows to the satisfaction of the District that the absence of the equipment is due to its being rebuilt or otherwise reworked offsite, or in temporary storage onsite. Failure to make this showing at the time of permit reevaluation and failure to obtain a permit modification listing the absent equipment shall result in removal of the absent equipment from the Permit to Operate upon the next reevaluation of the permit.

**K. Requirement - Inoperability of Permitted Equipment**

A permitted item of equipment found in inoperable condition must be demonstrated by the operator, to the satisfaction of the Control Officer, either to function in compliance with applicable permit conditions or to have no pollutant emissions. This section shall not apply to well heads.



# General Permit Application Form -01

Santa Barbara County Air Pollution Control District  
260 N. San Antonio Road, Suite A  
Santa Barbara, CA 93110-1315

**1. APPLICATION TYPE** (check all that apply):

- Authority to Construct (ATC)                       Transfer of Owner/Operator (use Form -01T)
- Permit to Operate (PTO)                               Emission Reduction Credits
- ATC Modification                                       Increase in Production Rate or Throughput
- PTO Modification                                       Decrease in Production Rate or Throughput
- Other (Specify)

Previous ATC/PTO Number (if known)

Yes  No Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. <http://www.ourair.org/wp-content/uploads/t5-forms.pdf>

Mail the completed application to the APCD's Engineering Division at the address listed above.

**2. FILING FEE:**

A \$420 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: <http://www.ourair.org/district-fees>). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

**3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL?** If yes, and the project results in an emissions increase, submit a completed Form -03 (*School Summary Form*) <http://www.ourair.org/wp-content/uploads/apcd-03.pdf>     Yes  No

If yes, provide the name of school(s)

Address of school(s)

City  Zip Code

**4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION?**     Yes     No

If yes, please submit with a redacted duplicate application which shall be a public document. In order to be protected from disclosure to the public, all information claimed as confidential shall be submitted in accordance with APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*): <http://www.ourair.org/wp-content/uploads/6100-020.pdf>, and meet the criteria of CA Govt Code Sec 6254.7. Failure to follow required procedures for submitting confidential information, or to declare it as confidential at the time of application, shall be deemed a waiver by the applicant of the right to protect such information from public disclosure. *Note: Part 70 permit applications may contain confidential information in accordance with the above procedures, however, the content of the permit documents must be public (no redactions).*

FOR APCD USE ONLY				DATE STAMP
FID	11664	Permit No.	ATC 15634	Rec'vd 11/23/2020
Project Name	Central Coast Agriculture			
Filing Fee	\$840	202.E? YES / NO		

Ck #1332 Central Coast Agriculture, Inc.



December 22, 2020

9171 9690 0935 0250 8818 38

Ms. Lindsay Cokeley  
Central Coast Agriculture  
85 W. Highway 246, #233  
Buellton, CA 93427

FID: 11664  
Permit: A 15634  
SSID: 11415

Re: Incomplete Authority to Construct Application 15634

Dear Ms. Cokeley:

On November 23, 2020, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC) No. 15634 for a cannabis manufacturing facility. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 961-8826. Thank you for your cooperation.

Sincerely,

Kevin Brown, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: Central Coast Agriculture 11664 Project File  
Engr Chron File  
John DeFriel

\\sbcapcd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture\ATCS\ATC 15634\ATC 15634 - ATC Incompleteness - 12-22-2020

Aeron Arlin Genet, Air Pollution Control Officer

805.961.8800 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 ourair.org @OurAirSBC

ATTACHMENT

**ATC NO. 15634 INCOMPLETENESS ITEM LIST**

1. **Redacted Information.** Contact the District to set up a meeting to discuss the redacted information in the permit application and what is eligible to be redacted per the District's Policies and Procedures as well as California Government Code Section 6254.7.
2. **Proposed BACT.** Provide the following information for the proposed Best Available Control Technology:
  - a. Two-stage cold trap manufacturer specifications and emissions control guarantee.
  - b. Description of how the two-stage cold trap operates to control ROC emissions.
  - c. How are ROC vapors captured in the [REDACTED]?  
How are these captured vapors transported to the two-stage cold trap?
  - d. Are ROC emissions from spent biomass being transferred from the extraction column to centrifuges to the vacuum ovens being controlled? If so, how?
  - e. Define [REDACTED] how does the two-stage cold trap control emissions from this source?
  - f. How are the "recovered solvents" sent back to the solvent storage tank (i.e. pumps, gravity fed, etc)?
  - g. Do the carbon adsorption systems control ROC emissions or are these systems exclusively used to control odors? If these systems are used to control ROC, provide manufacturer specifications and emissions control guarantee.
  - h. Is the proposed [REDACTED] connected to the two-stage cold trap? If not, why?
3. **Process Description.** Provide a written process description for this facility's operations. The example permits sent to Lindsay Cokeley and Matthew Allen on November 23, 2020 may be used as a template.
4. **Solvent Emission Calculations.** Form-104 Section 3 notes that [REDACTED] are used in the volatile extraction process, but emissions from these solvents are not listed Form-104 Table 1. Revise the Form-104 to account for the emissions from butane and propane. Alternatively, specify if these emissions are included as part of [REDACTED]

Please note that all solvent throughout values listed in Table 1 should only be for the worst-case make-up solvent use. The total solvent capacity or throughput of the facility should not be used in this table. Revise Form-104 Table 1 as needed.



5. **Equipment List.** Provide the District with an itemized facility equipment list with the following information for each piece of equipment:

- a. Manufacturer make and model
- b. Brief equipment description (as needed)
- c. Rating/capacity (as applicable)
- d. Associated process (i.e. volatile extraction, post extraction refinement, etc.)
- e. Number of units
- f. Facility location

Please note that District permits equipment that contacts solvents, cannabis, and cannabis byproducts as well as control systems. These types of equipment include, but not limited to, the following:

- Grinders
- Milling machines
- Loaders
- Extractors
- Electric motors (centrifuges, compressors, filter pumps, etc.)
- Extraction/process tanks
- Vacuum skids
- Solvent storage tanks
- Evaporators
- Condensers
- Distillation systems
- Dryers
- Ovens
- Fume hoods
- Oil mist filters
- Emission and odor control systems
- Emission and odor control system fans
- Freezers
- Labeling and distribution equipment

6. **Manufacturer Specifications.** Submit manufacturer specifications for the equipment listed in your response to Item #3. Note that a resubmittal is not needed if manufacturer specifications have already been submitted to the District.

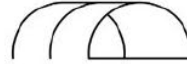
7. **Boiler(s).** Review District Rules 360, 361, and 342 (link: <https://www.ourair.org/current-rules-and-regulations/>) to determine if any boilers at the facility are subject to permit. If it is determined that any boilers are subject to permit, submit the following (as applicable):

- a. Form-33 (link: <https://www.ourair.org/wp-content/uploads/apcd-33.pdf>)
- b. Form-61 (link: <https://www.ourair.org/wp-content/uploads/apcd-61.pdf>)
- c. Emission calculations (link: <https://www.ourair.org/wp-content/uploads/Boilers.xlsx>)

Contact the District if you have any questions regarding boiler rules and regulations.

8. **Solvent Disposal.** How is solvent waste disposed? Include any storage details prior to disposal and the disposal facility/methodology.
9. **Biomass Disposal.** How is spent cannabis biomass disposed? Include any storage details prior to disposal and the disposal facility/methodology.
10. **Health Risk Assessment.** The District will conduct a Health Risk Assessment (HRA) Screening for this project after more information is received. This comment is for informational purposes only. No response is required.

CENTRAL COAST AGRICULTURE, INC.



85 W Hwy 246 #233, Buellton CA 93427

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TELEPHONE: 818.317.8414  
E-MAIL: [lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)

February 10, 2021

Kevin Brown - Air Quality Engineer III  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110

Re: Response to Incomplete Authority to Construct Application 15634

Dear Mr. Brown:

This letter is in response to the application submitted November 23, 2020 for a request for additional information. Please see the below responses to the incomplete letter received December 23, 2020.

**1. Redacted Information**

CCA had a meeting with Kevin Brown, a District engineer on November 23, 2020 and January 6, 2021 to discuss the redacted information in the permit application. A final redacted version of the permit application is included as an attachment to this letter. According to Government Code Section 6254.7(d), "trade secrets" as defined are not considered public records. We consider various components of the submitted application to be trade secrets, including the specific equipment (make, model, throughput), the solvent type and amounts used, and our specific SOPs to produce the number one selling brand of Cannabis concentrates in California. These items fit the definition under the above code, as they consist of tools and formulas which gives our business a competitive advantage over others who do not know about it or use it. All of our equipment vendors do not typically sell to the cannabis industry and/or our competitors do not know where we purchase our equipment. A new itemized list of equipment has been included, with pertinent details redacted.

**2. Proposed BACT**

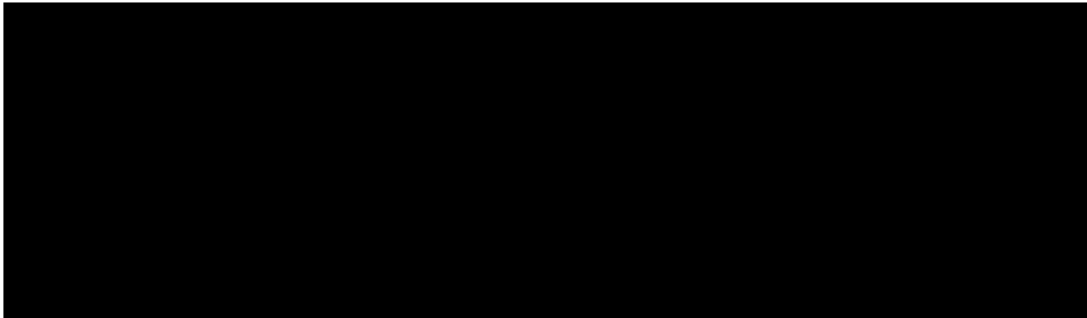
- **Two-stage cold trap manufacturer specifications and emissions control guarantee.**

The two-stage cold trap reduces the vent temperature to -120 degC. At this low

recycled to the system. At this cryogenic temperature, the remaining vent contains significantly reduced ROC as shown in the results from the simulation below:

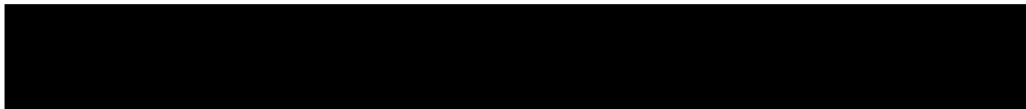
	Units	<u>HOT VENT</u>	<u>COLDVENT</u>	<u>LIQUID</u>
Temperature	C	25	-120	-120
Pressure	bar	1.1	1.01325	1.01325
Mass Density	kg/cu m	1.3088734	2.22967925	708.5922
Average MW		29.496267	28.0201231	49.91426

—  
—



The remaining vents are sent to carbon capture filters that remove essentially all remaining [REDACTED] t.

- **Description of how the two-stage cold trap operates to control ROC emissions.**



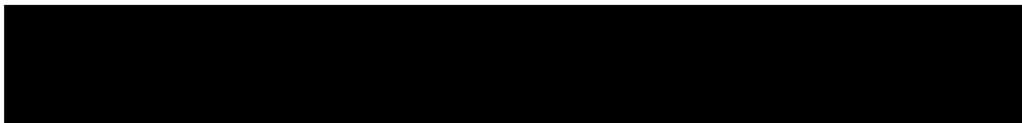
- **How are ROC vapors captured in the [REDACTED] [REDACTED] How are these captured vapors transported to the two-stage cold trap?**

The vent streams from these units are piped into a common vent header. This header ports all vapors to the two-stage cold trap.

- **Are ROC emissions from spent biomass being transferred from the extraction column to centrifuges to the vacuum ovens being controlled? If so, how?**



- **Define [redacted] how does the two-stage cold trap control emissions from this source?**



- **How are the “recovered solvents” sent back to the solvent storage tank (i.e. pumps, gravity fed, etc)?**

The recovered solvents accumulate in the bottom of the cold trap. Once a sufficient level has accumulated, the contents are transported from the cold trap using pressurized nitrogen to move the liquids into the [redacted] storage containers.

- **Do the carbon adsorption systems control ROC emissions or are these systems exclusively used to control odors? If these systems are used to control ROC, provide manufacturer specifications and emissions control guarantee.**

The carbon filters adsorb odor causing compounds as well as the [redacted] components and operate at a high efficiency, adsorbing essentially all ROC's when properly maintained.

- **Is the proposed fume hood connected to the two-stage cold trap? If not, why?**

No... The units serviced by the fume hood have dedicated, smaller cold traps to remove the majority of the solvents before vented to the vent hood. The vent hood can not be directly ported to the two-stage cold trap because water vapor from atmospheric air would freeze and reduce the cold traps efficiency. The small dedicated cold traps are used before the process vents are exposed to atmospheric air.

### **3. Process Description**

CCA Products LLC, a cannabis manufacturing facility, and CCA Distribution LLC, a cannabis distribution facility produce various products from raw cannabis plant material. These products include live resin, live sauce, diamonds, vape cartridges, whole flower, and pre-rolls. The facility uses both volatile and non-volatile extraction methods in addition to trimming, sorting, packaging, labeling and storage. CCA Products operates under the State of California Cannabis Manufacturing License CDPH-100031596. CCA Distribution operates under the State of California Cannabis Distribution Licenses C11-0000496 and C11-0001094. Odors generated from the process are controlled by multiple carbon air filters which are installed throughout the facility to prevent odors from escaping from the building envelope. Solvent

emissions are controlled with various technologies including closed-loop volatile extraction booths and cold traps with additional carbon capture systems.

**4. Solvent Emissions Calculations**



**5. Equipment List**

All equipment is (or will be) located within the two buildings located at 1201 W Chestnut Ave and 1200 W Laurel. Please see the new “Equipment List” Spreadsheet for more information.

**6. Manufacturer Specifications**

A document titled “Equipment Specifications - Confidential” was included with the application. Please advise if this document was not received in the email as an attachment to the submission on November 13.

**7. Boilers**

There are no boilers proposed to be used for this cannabis facility.

**8. Solvent Disposal**

Solvent is disposed of as hazardous waste. The facility has a small quantity generator EPA ID, and disposes of any and all hazardous waste through a GAIACA. Hazardous Waste is collected, logged, labeled, and stored before being picked up by GAIACA for disposal.

**9. Biomass Disposal**

Cannabis Waste is regulated by the City of Lompoc, the California Department of Public Health and the Bureau of Cannabis Control through the cannabis licensing process. Below is an excerpt from our city and state approved Waste Management Plan regarding cannabis waste.

Cannabis Waste Management

Policy: All waste shall be disposed of in accordance with applicable federal, state and local laws and regulations.

Procedure: Cannabis waste of any form must be disposed of in secured waste receptacles.

- Secure cannabis waste receptacles

- Waste receptacles or waste storage area is to be kept locked and only opened for emptying. Waste receptacles are kept in designated limited access areas at all times.
  - Waste storage area is to be under 24 hour surveillance to prevent tampering or entry of unauthorized personnel.
  - Only cannabis and cannabis products shall be disposed of in the secure cannabis waste receptacles.
  - All cannabis waste to be disposed of will be accurately weighed and documented for reporting into the track-and-trace system within 24 hrs of action.
  - A detailed “Waste Management Log” shall be kept on record and updated by authorized personnel to include details regarding source, weights of waste material, type of waste and date of input.
  - All cannabis waste collected in secure receptacles is destroyed by mixing with a minimum of 51% inert material as to make it unusable and unrecognizable.
  - Cannabis waste from the secure receptacle is picked up by an approved green waste hauler/recycler.
  - A designated “sensitive materials” waste receptacle is to be utilized for disposal of any waste products containing cannabis residue or remnants.
  - Access to secure waste receptacles is limited to the following personnel:
    - Licensee
    - Employees of entity
    - Licensing Agency
    - Permitted private waste hauler
- Hazardous Waste
    - Hazardous waste as defined by section 20141 of the Public Resources Code is to be properly disposed of in a manner consistent with federal, state, and local laws and regulations.
    - Cannabis Hazardous Waste includes, but is not limited to:
      - Products containing pesticides or other agricultural chemicals
      - Products containing unsafe levels of solvent or other manufacturing chemicals
      - Cannabis that has been soaked in solvent for the purpose of producing a manufactured cannabis product
    - Post Extraction Cannabis Biomass waste is transferred using secure waste receptacles to a mechanical separator. The biomass is mechanically separated removing any residual solvents from the plant. After this separation the cannabis biomass is considered green waste according to the guidelines set and defined by Public Resource Code Section 40141. The collected solvent is returned to the production line via a closed-loop

system and the green was is transferred to a secure storage container for pick up by the authorized green waste hauler.

- Destruction of Green Waste
  - The Solid Waste Division or private green waste hauler shall be contacted for a regular pick up of any and all green waste generated on site.
  - All green waste procedures including destruction shall be approved by the Solid Waste Superintendent for the City.
  - All cannabis waste to be composted will be accurately weighed and documented for reporting into the track-and-trace system within 24 hours of action.
  - No packaging, labeling, or garbage of any kind is to be disposed of in the secure green waste areas.

Please let us know any additional information is needed in response to this request.

Sincerely,

Lindsay Cokeley  
Compliance Supervisor



Manufacturer Make and Model	Brief Equipment Description	Rating/Capacity	Associated Process	Number of Units	Facility Location
			Curing	1	Laurel Building
			Curing	1	Laurel Building
			Curing	1	Laurel Building
	Trimmer		Flower Trimming	1	Laurel Building
	Refrigerated Storage Container		Storage	14	Chestnut Building Also Laurel
	Closed-loop hydrocarbon Extractor		Volatile Extraction	8	Chestnut Building
	Centrifuge		Mechanical Extraction	4	Chestnut Building
	Distillation		Post extraction refinement	4	Chestnut Building
	Distillation		Post extraction refinement	2	Chestnut Building
	Vacuum Oven		Vacuum Purging	4	Chestnut Building
	Solvent Recovery System		Post Refinement Recovery	2	Chestnut Building
	Fume Hood		Fume Hood	1	Chestnut Building
	Bake Out Oven		Vessel Cleaning	3	Chestnut Building
	Homogenizer		Post-processing	1	Chestnut Building
	Vacuum Pump		Vacuum Application	5	Chestnut Building
	Vacuum Pump		Vacuum Application	3	Chestnut Building
	Fume Hood		Fume Hood	1	Chestnut Building
	Cartridge Filling Machine		Packaging	6	Chestnut Building
	Mouthpiece Fastener		Packaging	5	Chestnut Building
	Oil Mist Filter		Mist Filtration & Odor reduction	8	Chestnut Building
	Freezer		Storage	1	Laurel Building
	Ultrasonic Washer		Dishwashing	2	Chestnut Building
	Tunnel Dryer		Drying labware or dishes	1	Chestnut Building
	Freezer		Seed storage	1	Laurel Building
	Liquid accumulation drum		Vent header Cold Trap	1	Chestnut Building
	Shell and Tube Heat Exchanger		Vent header Cold Trap	1	Chestnut Building
	Mechanical feeder		Post-processing Flower	1	Laurel Building
	Spray Nozzles		Post-processing Flower	2	Laurel Building
	Cannabis Sorting instrument		Post-processing Flower	1	Laurel Building
	Fresh Frozen Material Columns		Mechanical Extraction	4	Chestnut Building
	Solvent Holding Columns		Mechanical Extraction	4	Chestnut Building
	Solvent/Solute Holding Cauldron		Mechanical Extraction	14	Chestnut Building
	Pump for pulling vacuum on vesse		Mechanical Extraction	3	Chestnut Building
	Chiller		Mechanical Extraction	2	Chestnut Building
	Chiller		Mechanical Extraction	9	Chestnut Building
	Chiller		Mechanical Extraction	1	Chestnut Building
	Closed-loop hydrocarbon Extractor		Volatile Extraction	7	Laurel Building
	Fresh Frozen Material Columns		Mechanical Extraction	8	Laurel Building
	Solvent/Solute Holding Cauldron		Mechanical Extraction	20	Laurel Building
	Pump for pulling vacuum on vessel		Mechanical Extraction	4	Laurel Building
	Chiller		Mechanical Extraction	9	Laurel Building

March 12, 2021

9171 9690 0935 0256 6489 85

Ms. Lindsay Cokeley  
Central Coast Agriculture  
85 W. Highway 246, #233  
Buellton, CA 93427

FID: 11664  
Permit: A 15634  
SSID: 11415

Re: Incomplete Authority to Construct Application 15634

Dear Ms. Cokeley:

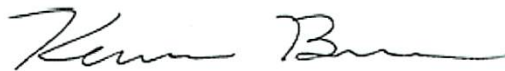
On November 23, 2020, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC) No. 15634 for a cannabis processing facility. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 961-8826. Thank you for your cooperation.

Sincerely,



Kevin Brown, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: Central Coast Agriculture - Chestnut Ave. 11664 Project File  
Engr Chron File

\\sbapcd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture\ATCs\ATC 15634\ATC 15634 - ATC Incompleteness - 3-11-2021

ATTACHMENT

**ATC NO. 15634 INCOMPLETENESS ITEM LIST**

1. **Best Available Control Technology.**

- a. **Clearinghouses Review.** Review Best Available Control Technologies (BACT) Clearinghouses from, but not limited to, California Air Resources Board, South Coast AQMD, San Joaquin Valley APCD, Bay Area AQMD, San Diego County APCD, Sacramento Metro AQMD, San Luis Obispo County APCD, Monterey Bay Air Resources District, Ventura County APCD and Mojave Desert AQMD to confirm there are no other viable control technologies for solvent or cannabis facilities which exceed the proposed 99% control efficiency.

If a technology is found with a greater control efficiency than the proposed 99% control efficiency but is not viable for your facility processes, provide an explanation why the control technology in question is not viable.

If a viable technology is found with a greater control efficiency than the proposed 99% control efficiency, revise the permit application accordingly to propose the other viable technology. Alternatively, demonstrate that this viable control technology is not cost effective. The District's cost effectiveness policy and procedures can be found at <https://www.ourair.org/wp-content/uploads/6100-064-1.pdf>.

- b. **Cold Trap Guarantee.** Submit documentation directly from the cold trap manufacturer with an emissions control guarantee for the processes at your facility.
- c. **Carbon Adsorption Systems Guarantee.** The permit application states that carbon adsorption systems serve a dual purpose of odor control and ROC emission control. If the carbon adsorption systems contribute to some or all of the 99% control indicated in the permit application, submit documentation directly from the carbon adsorption system manufacturer with an emissions control guarantee for the processes at your facility.

2. **Manufacturer Specifications.** Submit manufacturer specifications for the two-stage cold trap and carbon absorption systems.

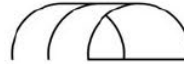
3. **Volatile Extraction Building(s).** The equipment list indicates that volatile extraction will take place in both the Chestnut and Laurel buildings. However, the submitted site maps indicate that volatile extraction only occurs in the Chestnut building. Confirm where volatile extraction takes place.

If volatile extraction occurs in both the Chestnut and Laurel buildings, submit documentation showing how the cold trap will control emissions from both buildings. Alternatively, indicate that a cold trap will be installed at each building.

4. **Solvent Emission Calculations.** Form-104, Table 1 notes [REDACTED] is used for general solvent cleaning but does not include usage or emissions. Revise and resubmit Form-104 to include the worst-case [REDACTED] usage and emissions.

5. **Material Safety Data Sheet.** Submit the Material Safety Data Sheet (MSDS) for [REDACTED] with the ROC/VOC content noted.
6. **Health Risk Assessment.** The District will conduct a Health Risk Assessment (HRA) Screening for this project after more information is received. This comment is for informational purposes only. No response is required.

CENTRAL COAST AGRICULTURE, INC.



85 W Hwy 246 #233, Buellton CA 93427

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TELEPHONE: 818.317.8414  
E-MAIL: [lindsav@ccagriculture.com](mailto:lindsav@ccagriculture.com)

October 6, 2021

Mr. Kevin Brown  
Air Quality Engineer III  
Santa Barbara County  
Air Pollution Control District  
Engineering Division  
260 North San Antonio Road, Suite A  
Santa Barbara CA 93110

Subject: ATC 15634 Incompleteness Response – Chestnut Cannabis Processing Facility, SSID 11415, FID 11664

Dear Mr. Brown:

Central Coast Agriculture (CCA) received an Incomplete Authority to Construct Application Letter for ATC 15634 for a cannabis processing facility on Chestnut Avenue in Lompoc, CA, dated March 12, 2021. A response time extension was granted to CCA to allow submittal of the requested information after the initial 120 days from application filing.

The following information is provided by CCR in response to the Incompleteness Item List.

1. *Best Available Control Technology.*
  - a. *Clearinghouses Review.*
  - b. *Cold Trap Guarantee.*
  - c. *Carbon Adsorption System Guarantee.*

CCA and their consultants performed a review of Best Available Control Technology for cannabis solvent facilities. In consultation with the District, it was determined that Santa Barbara County APCD BACT for cannabis facilities with a solvent extraction process is 95% solvent recovery at the extraction equipment.

CCA plans to install the [REDACTED] cold trap solvent recovery technology as the main system to collect and liquefy the solvent vapors (VOCs) for reinjection into the extraction process. According to [REDACTED] cold trap can achieve a 99% recovery of the solvents from the [REDACTED]. (See attached [REDACTED] Informational Sheets.)

A Process Flow Diagram (PFD) is attached showing the estimated solvent usage and recovery amounts through the cold trap. There are some process areas where the solvent

vapors will not be recovered through the cold trap, so although the cold trap efficiency is 99%, the overall facility solvent recovery efficiency is slightly lower. A carbon system will be used to reduce the odors from the solvent processing facility. CCA conducted on-site testing of the carbon system, and while it does a good job controlling the odors, the carbon system does not significantly remove the VOC vapors.

2. *Manufacturer Specifications. Submit manufacturer specifications for the two-stage cold trap and carbon absorption systems.*

The cold trap and carbon absorption system manufacturer's information and specifications are attached. The carbon absorption system is for odor control only and is not part of the solvent recovery process.

3. *Volatile Extraction Building(s). Confirm where volatile extraction takes place (Chestnut or Laurel buildings or both). If volatile extraction occurs in both buildings, submit documentation showing how the cold trap will control emissions from both buildings.*

The volatile extraction process and equipment is currently housed in the Chestnut building. Some of the equipment will be moved to the Laurel building in the future. CCA requests that the PTO be written to allow flexibility for the equipment to be located at both locations.

4. *Solvent Emission Calculations. Revise and submit Form-104 to include the worst-case D-limonene usage and emissions.*

A revised Form-104 including the worst-case solvent usage and emissions is attached. The values changed somewhat from the original ATC Application due to a change in the cold trap vendor and the removal of the carbon system as solvent recovery equipment.

5. *Material Safety Data Sheet. Submit the MSDS for D-limonene with the ROC/VOC content noted.*

The MSDS for [REDACTED] is attached. The VOC content is >95% by volume.

6. *Health Risk Assessment. The District will conduct a HRA Screening for this project.*

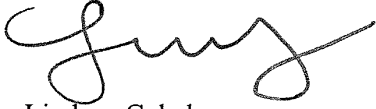
No response required.

#### *Additional Items – Equipment List and Process Description Update*

New equipment lists and an updated Manufacturing Business Process Description are now available for the Chestnut and Laurel Buildings. See attached. These documents supersede the ones previously submitted.

Please contact me at 818-317-8414 or [lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lindsay', with a long horizontal flourish extending to the right.

Lindsay Cokeley  
Director of Compliance

**Attachments:**

Cold Trap and Carbon System Vendor and Manufacturer Information  
Solvent Facility PFD  
Revised Equipment Lists  
Revised Manufacturing Business Process Description  
Revised APCD Form-104  
MSDS D-Limonene

Ms. Lindsay Cokeley  
Central Coast Agriculture  
85 W. Highway 246, #233  
Buellton, CA 93427

FID: 11664  
Permit: A 15634  
SSID: 11415

Re: Incomplete Authority to Construct Application 15634

Dear Ms. Cokeley:

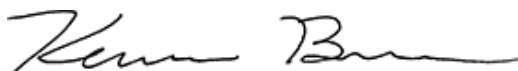
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Please be advised that construction of your facility without a **final** ATC is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 961-8826. Thank you for your cooperation.

Sincerely,



Kevin Brown, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: Central Coast Agriculture - Chestnut Ave. 11664 Project File  
Engr Chron File

\\sbapcd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture\ATCs\ATC 15634\ATC 15634 - ATC Incompleteness - 10-28-2021



ATTACHMENT

**ATC NO. 15634 INCOMPLETENESS ITEM LIST**

1. **Confidential Information.** If Central Coast Agricultural still considers information contained in the permit application to be confidential, submit confidential and redacted versions of the October 5, 2021 incompleteness response submittal per the District's Policies and Procedures as well as California Government Code Section 6254.7. Additionally, submit confidential and redacted versions of the responses to this incompleteness letter. Disregard this item if Central Coast Agricultural no longer considers the submitted application information to be confidential.
2. **City of Lompoc Permit.** Submit a copy of the City of Lompoc permit CCU2018-06. Additionally, submit documentation of any other permits and/or approvals in process with or issued by the City of Lompoc, including the associated CEQA determinations.
3. **Process Description.** Address the following items related to the facility process description:
  - a. **Updated Description.** With the addition of newly proposed equipment, submit an updated facility process description. This description should detail the facility's biomass and solvent process flows, relevant equipment operations (i.e., extractors, cold trap, ovens, etc.) and what processes are conducted in the Chestnut and Laurel buildings (extraction, post-extraction refinement, labelling, etc.).
  - b. **Process Flows.** Provide a description of the following process flows listed in the "CCA Solvent Facility Flow Diagram" including, but not limited to, associated equipment and how potential emissions are routed to the cold trap (as applicable):
    - i. [REDACTED]
    - ii. [REDACTED]
    - iii. [REDACTED]
    - iv. [REDACTED]
4. **Best Available Control Technology.** Address the following items related to the cold trap system as it relates to BACT:
  - a. **Proposed Cold Trap Setup.** For the currently proposed cold trap system setup (controlling the extractors and new oil stock vessels) submit the following information:
    - i. **ROC Control.** Submit the ROC control efficiency as a percentage for (a) all the processes being controlled by the cold trap and (b) the whole facility.
    - ii. **ROC Emissions.** For the proposed cold trap system setup, submit the facility uncontrolled (i.e., if no cold trap was installed) and controlled ROC emission calculations. Daily emissions should be in units of pounds per day and annual emissions should be units of tons per year.

iii. **Proposed System Costs.** Submit the following capital costs, annual costs, and other information for the installation and maintenance for the proposed cold trap setup. Note that many of these costs may not be applicable to the proposed cold trap system setup. If some of this cost information is not available, the District will assume default values or percentages:

1. **Capital Costs - Purchased Equipment Costs.** Cold trap system(s), instrumentation, sales tax, and freight in dollars.
2. **Capital Costs - Direct Installation Costs.** Foundations and support, handling and erection, electrical, piping, insulation, and painting in dollars.
3. **Capital Costs - Other Direct Costs.** Site preparations and buildings in dollars.
4. **Capital Costs - Indirect Costs.** Engineering, construction and field expenses, contractor fees, start-up, performance tests, and contingencies in dollars.
5. **Annual Costs – Direct Annual Costs.** Operating labor, operating labor supervisor, maintenance labor, maintenance material (i.e., nitrogen, etc.), electricity, related support systems (ex. nitrogen chiller, heat exchanger, etc.), and needed material disposal directed related to the cold trap in dollars.
6. **Indirect Annual Costs (\$).** Overhead, administrative charge, property taxes, insurance, and annual source tests in dollars.
7. **Equipment Life.** Life of the cold trap system in years.

b. **Possible Cold Trap Setups.** Submit the following information for possible cold trap system setups:

i. **Technical Analyzes.** Provide analyses demonstrating that the following processes are or are not technically feasible to connect to the cold trap system.

1. [REDACTED] Note: The District has seen other cannabis processing facilities place spent biomass in ovens to bake off entrained solvents. Determine if it is technically feasible to route these baked off solvent vapors to the cold trap.
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]

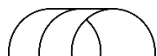
5. [REDACTED]

6. [REDACTED]

ii. **Technically Feasible Cold Trap System Setups.** Submit the following information for the processes identified as technically feasible in the response to item 4.b.i above.

1. **ROC Control.** For each of the technically feasible cold trap system setups, submit the ROC control efficiency as a percentage for (a) all the processes being controlled by the cold trap and (b) the whole facility.
2. **ROC Emissions.** For each of the technically feasible cold trap system setups, submit the facility uncontrolled (i.e., if no cold trap was installed) and controlled ROC emission calculations. Daily emissions should be in units of pounds per day and annual emissions should be units of tons per year.
3. **Technically Feasible System Costs.** Submit the following capital costs, annual costs, and other information for the installation and maintenance for the technically feasible cold trap system setups. Note that many of these costs may not be applicable to the technically feasible cold trap system setups. If some of this cost information is not available, the District will assume default values or percentages:
  - a. **Capital Costs - Purchased Equipment Costs.** Cold trap system(s), instrumentation, sales tax, and freight in dollars.
  - b. **Capital Costs - Direct Installation Costs.** Foundations and support, handling and erection, electrical, piping, insulation, and painting in dollars.
  - c. **Capital Costs - Other Direct Costs.** Site preparations and buildings in dollars.
  - d. **Capital Costs - Indirect Costs.** Engineering, construction and field expenses, contractor fees, start-up, performance tests, and contingencies in dollars.
  - e. **Annual Costs – Direct Annual Costs.** Operating labor, operating labor supervisor, maintenance labor, maintenance material (i.e., nitrogen, etc.), electricity, related support systems (ex. nitrogen chiller, heat exchanger, etc.), and needed material disposal directed related to the cold trap in dollars.
  - f. **Indirect Annual Costs.** Overhead, administrative charge, property taxes, insurance, and annual source tests in dollars.
  - g. **Equipment Life.** Life of the cold trap system in years.

5. **Cold Trap Installation.** Will one cold trap control ROC emissions from both the Chestnut and Laurel buildings, or will each building be equipped with a dedicated cold trap?
6. **Equipment List.** Address the following items related to the submitted equipment list:
  - a. **Electric Motors.** As applicable, revise the submitted equipment list to identify the horsepower ratings of all the electric motors (i.e., vacuum pumps, chillers, mills, sifters, etc.).
  - b. **Fume Hoods.** Identify the processes and equipment associated with the three identified fume hoods in the equipment list and if these fume hoods vent to the cold trap.
7. **Health Risk Assessment.** The District will conduct a Health Risk Assessment (HRA) Screening for this project after more information is received. This comment is for informational purposes only. No response is required.



CENTRAL COAST AGRICULTURE, INC.  
85 W HWY 246 #233, Buellton, CA 93427  
Telephone: 818.667.8912  
Email: [jacobn@ccagriculture.com](mailto:jacobn@ccagriculture.com)

December 2, 2021

Kevin Brown – Air Quality Engineer III  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110

Re: Response to Incomplete Authority to Construct Application 15634

Dear Mr. Brown:

I am writing to acknowledge receipt of your Incomplete Authority to Construct Application 15634 letter dated November 2, 2021. Please find enclosed the written response and supporting documents.

CCA is actively looking for an alternative Cold Trap for the currently identified Cold Trap, the [REDACTED] [REDACTED] that meets the same or better operational parameters and efficiencies. CCA will notify APCD if an alternate unit is selected.

The following information is provided by CCA in response to the ATC No. 15634 Incompleteness Item List.

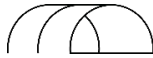
Kind regards,  
Jacob Nacorda, EIT  
Engineer I, Chemical Processing

#### **ATC NO. 15634 INCOMPLETENESS ITEM LIST**

- Confidential Information.** *If Central Coast Agricultural still considers information contained in the permit application to be confidential, submit confidential and redacted versions of the October 5, 2021 incompleteness response submittal per the District's Policies and Procedures as well as California Government Code Section 6254.7. Additionally, submit confidential and redacted versions of the responses to this incompleteness letter. Disregard this item if Central Coast Agricultural no longer considers the submitted application information to be confidential.*

**We have attached redacted versions of the revised application and response letter submitted October 5, 2021, response letter submitted February 10, 2021, and the most recent revised application package submitted October 5, 2021.**
- City of Lompoc Permit.** *Submit a copy of the City of Lompoc permit CCU2018-06. Additionally, submit documentation of any other permits and/or approvals in process with or issued by the City of Lompoc, including the associated CEQA determinations.*

**This is attached.**
- Process Description.** *Address the following items related to the facility process description:*



- a. **Updated Description.** With the addition of newly proposed equipment, submit an updated facility process description. This description should detail the facility’s biomass and solvent process flows, relevant equipment operations (i.e., extractors, cold trap, ovens, etc.) and what processes are conducted in the Chestnut and Laurel buildings (extraction, post-extraction refinement, labelling, etc.).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- b. **Process Flows.** Provide a description of the following process flows listed in the “CCA Solvent Facility Flow Diagram” including, but not limited to, associated equipment and how potential emissions are routed to the cold trap (as applicable):

- i. Closed Loop Process – Remove Solvent from Biomass

Central Coast Agriculture intends to operate a closed loop extraction process. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- ii. [REDACTED] BIOMASS, [REDACTED] Solvent

Should be [REDACTED] Solvent. [REDACTED] of BIOMASS refers to the maximum amount of flower CCA intends to process in a day. [REDACTED] of Solvent refers to the amount of solvent estimated to leave with the flower in liquid form. These [REDACTED] cannot be routed to the cold trap as it is what’s left after the vacuum degassing and cold trap capture of solvent of the material column occurs.

- iii. [REDACTED]

Central Coast Agriculture intends to replace the jars with stainless steel vessels to hold bulk oil. These vessels will hold bulk oil and solvent and will be degassed with a vacuum to the cold trap.

- iv. [REDACTED]

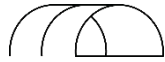
Current stock of bulk oil stored in jars will be used until depleted. The jars of bulk oil will have solvent degassed with a vacuum to the cold trap until new bulk oil is stored in larger stainless steel vessels.

- 4. **Best Available Control Technology.** Address the following items related to the cold trap system as it relates to BACT:

- a. **Proposed Cold Trap Setup.** For the currently proposed cold trap system setup (controlling the extractors and new oil stock vessels) submit the following information:

- i. **ROC Control.** Submit the ROC control efficiency as a percentage for (a) all the processes being controlled by the cold trap and (b) the whole facility.

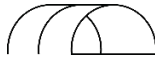
<b>ROC Control</b>
<b>ROC control efficiency as a percentage for all the processes being controlled by the cold trap</b>
99%
<b>ROC control efficiency as a percentage for the whole facility</b>
98%



- ii. **ROC Emissions.** For the proposed cold trap system setup, submit the facility uncontrolled (i.e., if no cold trap was installed) and controlled ROC emission calculations. Daily emissions should be in units of pounds per day and annual emissions should be units of tons per year.

Total facilities ROC daily usage includes approximately [REDACTED] of [REDACTED], [REDACTED] lb/day or [REDACTED], and [REDACTED] total extraction solvent mass for processing. The extraction equipment recycles approximately 78% of the extraction solvent, leaving approximately [REDACTED] total in the biomass ([REDACTED]) and bulk oil ([REDACTED]). Our combined extraction equipment and cold trap recovery from vacuum degassing and the biomass and recovered bulk oil will recover 98% of the total extraction solvent used daily in our facility.

ROC Emissions	lbs/day	tons/year
[REDACTED]	1604	208.8
[REDACTED]	10	1.3
[REDACTED]	0.051	0.007
[REDACTED]	5	.65
<b>Total Facility Uncontrolled</b>	<b>1619.051</b>	<b>210.8</b>
[REDACTED]	73	9.5
[REDACTED]	10	1.3
[REDACTED]	0.051	0.007
[REDACTED]	5	.65
<b>Total Facility Controlled</b>	<b>88.051</b>	<b>11.5</b>



iii. **Proposed System Costs.** Submit the following capital costs, annual costs, and other information for the installation and maintenance for the proposed cold trap setup. Note that many of these costs may not be applicable to the proposed cold trap system setup. If some of this cost information is not available, the District will assume default values or percentages:

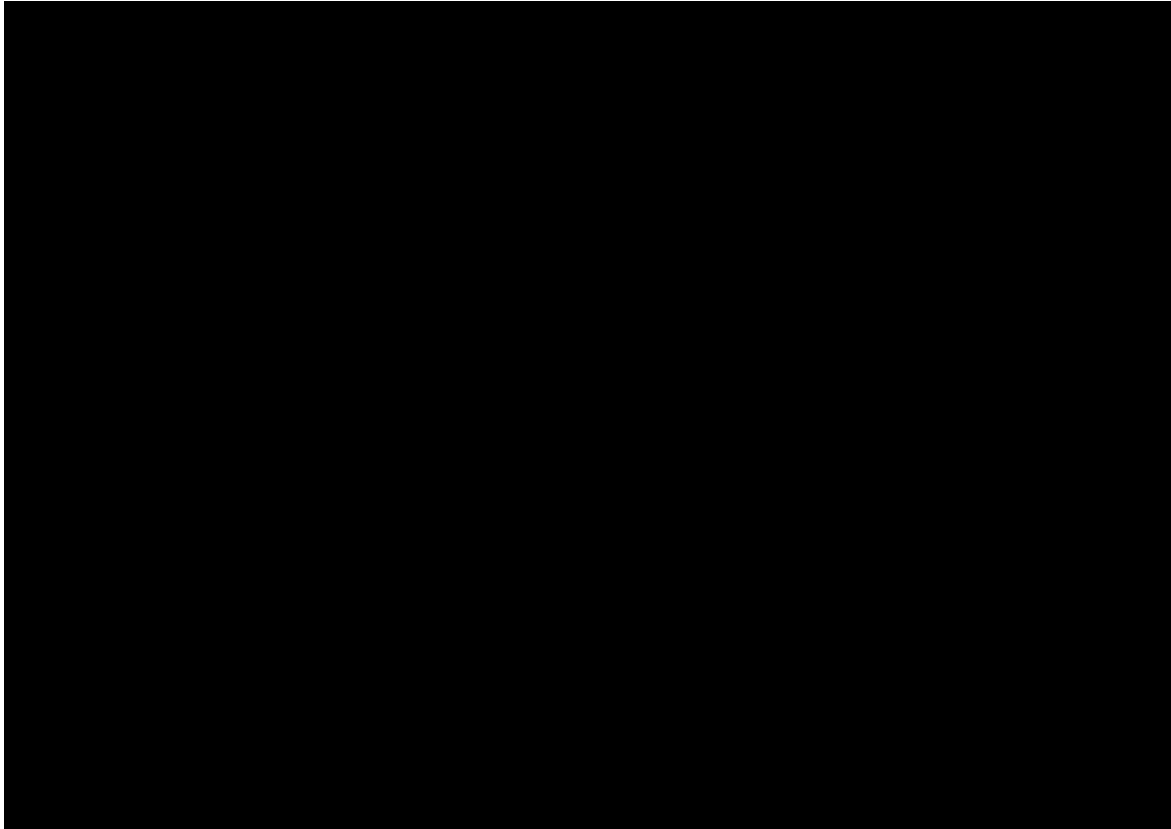
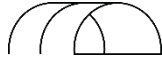
1. **Capital Costs - Purchased Equipment Costs.** Cold trap system(s), instrumentation, sales tax, and freight in dollars.  
Vendor quote for unit (\$470k), combined freight and installation (\$79,016), and sales tax (\$36,425): \$585,441 per Cold Trap. Add \$50,000 for redundant Water Removal/Regenerative Desiccant system for small amount of moisture that may enter the exhaust stream. Total line cost estimate is \$635,441.
2. **Capital Costs - Direct Installation Costs.** Foundations and support, handling and erection, electrical, piping, insulation, and painting in dollars.  
Estimate \$100k for Cold Trap plumbing and electrical for Chestnut only.
3. **Capital Costs - Other Direct Costs.** Site preparations and buildings in dollars.  
Estimate \$200k for trench through parking lot for [REDACTED], controls systems connections, and vent line to Cold Trap from Laurel building.
4. **Capital Costs - Indirect Costs.** Engineering, construction and field expenses, contractor fees, start-up, performance tests, and contingencies in dollars.  
Included in estimate in 4.a.iii.2 and 4.a.iii.3
5. **Annual Costs – Direct Annual Costs.** Operating labor, operating labor supervisor, maintenance labor, maintenance material (i.e., nitrogen, etc.), electricity, related support systems (ex. nitrogen chiller, heat exchanger, etc.), and needed material disposal directed related to the cold trap in dollars.  
Operating costs for Cold Trap is estimated to be cost of the [REDACTED] supply or \$85,166/yr and \$5k/yr for electricity and labor (1 hr/wk) for weekly defrost cycle. Total line cost estimate is \$90,166/yr.
6. **Indirect Annual Costs (\$).** Overhead, administrative charge, property taxes, insurance, and annual source tests in dollars.  
Indirect annual costs estimated to be 6% of direct annual costs or \$5,410/yr.
7. **Equipment Life.** Life of the cold trap system in years.  
15 years minimum

b. **Possible Cold Trap Setups.** Submit the following information for possible cold trap system setups:

i. **Technical Analyzes.** Provide analyses demonstrating that the following processes are or are not technically feasible to connect to the cold trap system.

1. [REDACTED]  
[REDACTED] Note: The District has seen other cannabis processing facilities place spent biomass in ovens to bake off entrained solvents. Determine if it is technically feasible to route these baked off solvent vapors to the cold trap.  
See updated description above, 3.a. detailing the vacuum and [REDACTED] process for keeping solvent inside the extraction equipment until removed and sent to the Cold Trap. Additionally, a model simulating the ovens processing [REDACTED] of biomass (assume biomass is 100% water) and [REDACTED] of solvent at [REDACTED] and atmospheric pressure is shown below.



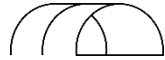


The vapor stream has a water mass flow rate of

WATER      kg/hr    0.977968965336385

This configuration requires additional gas drying equipment because a [REDACTED] Cold Trap can only handle 5kg of water before it requires a 3-4 hour defrost cycle. While this is technically feasible, this is not a cost-effective method considering the cost of equipment and associated utilities to heat the biomass (oven) and also remove moisture from the gas stream ([REDACTED]) to recover [REDACTED] of solvent. The [REDACTED] is a high estimate for residual solvent in the biomass after the vacuum extraction to cold trap process.

2. [REDACTED]  
Solvent removed using vacuum chamber with exhaust stream already sent to cold trap. See 3.b.iv
3. [REDACTED]  
Solvent removed from bulk oil prior to transfer to [REDACTED] for processing. See 6.b
4. [REDACTED]  
Solvent removed from bulk oil prior to transfer to [REDACTED] for processing. See 6.b
5. [REDACTED]



Solvent cleaning occurs using ethanol and is completed in an open system. Would require processing entire building air through cold trap. For example, assume the 17,438 sqft Chestnut building requires 2,616 CFM of air exchange ventilation per §120.1 Ventilation CFM Required per floor area. The [REDACTED] processes 150 normal cubic meters per hour or 88.3 CFM of gas flow, meaning 30 M150 units are required to process the normal building exhaust. Additionally, the building air contains water (as humidity) requiring removal before processing through a cold trap. 30 [REDACTED] units alone will cost \$17,563,230 to mitigate 10 lb/day of [REDACTED].

6. Area Cleaning

Area cleaning occurs using ethanol and is completed in an open system. Would require processing entire building air through cold trap as described in 4.b.i.5

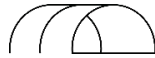
ii. **Technically Feasible Cold Trap System Setups.** Submit the following information for the processes identified as technically feasible in the response to item 4.b.i above.

- 1. **ROC Control.** For each of the technically feasible cold trap system setups, submit the ROC control efficiency as a percentage for (a) all the processes being controlled by the cold trap and (b) the whole facility.

See 4.a.i. The ROC control percentages for proposed and technically feasible are the same due to the order of magnitude difference between the mass of solvent and area cleaning ROC and mass of extraction solvent ROC.

- 2. **ROC Emissions.** For each of the technically feasible cold trap system setups, submit the facility uncontrolled (i.e., if no cold trap was installed) and controlled ROC emission calculations. Daily emissions should be in units of pounds per day and annual emissions should be units of tons per year.

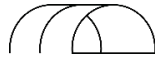
ROC Emissions	lbs/day	tons/year
[REDACTED]	1604	208.8
[REDACTED]	10	1.3
[REDACTED]	0.051	0.007
[REDACTED]	5	.65
<b>Total Facility Uncontrolled</b>	<b>1619.051</b>	<b>210.8</b>
[REDACTED]	73	9.5
[REDACTED]	10	1.3
[REDACTED]	0.051	0.007
[REDACTED]	5	.65
<b>Total Facility Controlled</b>	<b>88.051</b>	<b>11.5</b>



3. **Technically Feasible System Costs.** Submit the following capital costs, annual costs, and other information for the installation and maintenance for the technically feasible cold trap system setups. Note that many of these costs may not be applicable to the technically feasible cold trap system setups. If some of this cost information is not available, the District will assume default values or percentages:
- a. **Capital Costs - Purchased Equipment Costs.** Cold trap system(s), instrumentation, sales tax, and freight in dollars.  
Add 30 [REDACTED] units for building air processing as described in 4.a.i.5. Vendor quote for one [REDACTED] unit, freight, installation, and sales tax in 4.a.iii.1 multiplied by 31: \$18,148,671.00 for Cold Traps. Add \$1,550,000 for Water Removal/Regenerative Desiccant system. Total Line cost: \$19,698,741.
  - b. **Capital Costs - Direct Installation Costs.** Foundations and support, handling and erection, electrical, piping, insulation, and painting in dollars.  
Estimate \$2M for Cold Trap plumbing and electrical for Chestnut only.
  - c. **Capital Costs - Other Direct Costs.** Site preparations and buildings in dollars.  
Estimate \$400k for trench through parking lot for LN2 line, GN2 line, controls systems connections, and vent line to Cold Trap from Laurel building. Additional site preparations will be required to fit 30 additional M150 units at the facility; estimate \$1M. Total line cost is \$1,400k.
  - d. **Capital Costs - Indirect Costs.** Engineering, construction and field expenses, contractor fees, start-up, performance tests, and contingencies in dollars.  
Start with estimates already in 4.a.iii.2 and 4.a.iii.3 (\$300k) and add \$200k for site preparation engineering required to fit 30 additional M150 units at the facility. Total line cost estimate is \$500k.
  - e. **Annual Costs – Direct Annual Costs.** Operating labor, operating labor supervisor, maintenance labor, maintenance material (i.e., nitrogen, etc.), electricity, related support systems (ex. nitrogen chiller, heat exchanger, etc.), and needed material disposal directed related to the cold trap in dollars.  
31 times [REDACTED] usage, electricity, and weekly maintenance labor in 4.a.iii.5: \$2,795,146/yr
  - f. **Indirect Annual Costs.** Overhead, administrative charge, property taxes, insurance, and annual source tests in dollars.  
Indirect annual costs estimated to be 2% of direct annual costs or \$55,903/yr.
  - g. **Equipment Life.** Life of the cold trap system in years.  
15 years minimum

5. **Cold Trap Installation.** Will one cold trap control ROC emissions from both the Chestnut and Laurel buildings, or will each building be equipped with a dedicated cold trap?

One [REDACTED] cold trap will control emissions from both the Chestnut and Laurel buildings. A second [REDACTED] cold trap is requested to be permitted strictly for redundancy reasons. The current operations are only taking place within the Chestnut building. In the future, we would like to move the operations into the

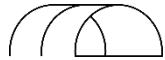


Laurel building, at which point the [REDACTED] installed within the Chestnut building would be connected to the Laurel process equipment.

- 6. **Equipment List.** Address the following items related to the submitted equipment list:
  - a. **Electric Motors.** As applicable, revise the submitted equipment list to identify the horsepower ratings of all the electric motors (i.e., vacuum pumps, chillers, mills, sifters, etc.).

<u>Equipment Touching Solvent</u>		
Location	Equipment Description	Motor Horsepower (hp)
Chestnut	[REDACTED]	2
Chestnut	[REDACTED]	1.2
Chestnut	[REDACTED]	0.75
Chestnut	[REDACTED]	0.5
Chestnut	[REDACTED]	1.5
Chestnut	[REDACTED]	7.5
Chestnut	[REDACTED]	4
Chestnut	[REDACTED]	1.5
Chestnut	[REDACTED]	1
Chestnut	[REDACTED]	1
Chestnut	[REDACTED]	0.33

<u>Equipment Not Touching Solvent</u>		
Location	Equipment Description	Motor Horsepower (hp)
Chestnut	[REDACTED]	1.5
Laurel	[REDACTED]	1
Laurel	[REDACTED]	0.5
Laurel	[REDACTED]	5
Laurel	[REDACTED]	7.5
Laurel	[REDACTED]	1.5
Laurel	[REDACTED]	0.25
Chestnut	[REDACTED]	3
Chestnut	[REDACTED]	15
Laurel	[REDACTED]	20
Laurel	[REDACTED]	10
Laurel	[REDACTED]	4
Laurel	[REDACTED]	15



- b. **Fume Hoods.** Identify the processes and equipment associated with the three identified fume hoods in the equipment list and if these fume hoods vent to the cold trap.

The fume hoods are to be used for the [REDACTED] and [REDACTED]. The units serviced by the fume hood have dedicated, smaller cold traps to ensure complete removal of terpenes before venting to the vent hood. The 1,500 CFM to 2,500 CFM vent hood exhausts are sent through a carbon filter to capture any odors, not solvent mitigation. Carbon is extremely inefficient in capturing CCA's solvent blend. The vent hood can not be effectively directly ported to the cold trap because 1) water vapor from atmospheric air would freeze and reduce the cold traps efficiency, and 2) the small dedicated cold traps are used before the process vents are exposed to atmospheric air. The cold trap requirements to treat each fume hood would require multiple [REDACTED] cold traps to process the fume hood air flow (17 [REDACTED]s for a 1500 CFM fume hood, and 29 [REDACTED]s for a 2500 CFM fume hood) as well as associated equipment to remove moisture from the exhaust stream. See 4.b.i.5 for additional information on large air volume processing with a cold trap.

7. **Health Risk Assessment.** The District will conduct a Health Risk Assessment (HRA) Screening for this project after more information is received. This comment is for informational purposes only. No response is required.

December 23, 2021

Ms. Lindsay Cokeley  
Central Coast Agriculture  
85 W. Highway 246, #233  
Buellton, CA 93427

FID: 11664  
Permit: A 15634  
SSID: 11415

Re: Incomplete Authority to Construct Application 15634

Dear Ms. Cokeley:

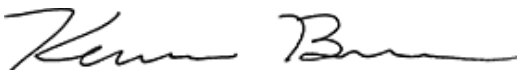
On November 23, 2020, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC) No. 15634 for a cannabis processing facility. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 961-8826. Thank you for your cooperation.

Sincerely,



Kevin Brown, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: Central Coast Agriculture - Chestnut Ave. 11664 Project File  
Engr Chron File  
Jacob Nacorda

\\sbcpd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture\ATCs\ATC 15634\ATC 15634 - ATC Incompleteness - 10-28-2021

ATTACHMENT

**ATC NO. 15634 INCOMPLETENESS ITEM LIST**

1. **Historical Criteria Pollutant Emission Estimates.** Submit historical criteria pollutant emission estimates for the stationary source (i.e., 1201 W. Chestnut and 1200 W. Laurel) from the time that cannabis manufacturing operations began until the present day. Criteria pollutants are defined as NO<sub>x</sub>, ROC, CO, SO<sub>x</sub>, PM, PM<sub>10</sub>, and PM<sub>2.5</sub>.

These estimates should include emissions from all stationary and mobile sources associated with the historical and existing cannabis manufacturing operations (i.e., solvents, generator engines, boilers, emission control equipment, motor vehicles, offroad equipment, etc.).

Include the following in the submitted historical criteria pollutant emission estimates:



- a. Annual emission estimates for each calendar year since cannabis manufacturing operations began until the present day.
- b. Average daily emissions estimates for each calendar year since cannabis manufacturing operations began until the present day.
- c. Average daily emissions estimates over the course of the facility's history.
- d. Peak daily emission estimates for each calendar year since cannabis manufacturing operations began until the present day.
- e. Peak daily emission estimates over the course of the facility's history.
- f. Documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the historical emission estimates.

2. **Historical Greenhouse Gas (GHG) Emission Estimates.** Submit historical direct and indirect GHG emission estimates for the stationary source (i.e., 1201 W. Chestnut and 1200 W. Laurel) from the time that cannabis manufacturing operations began until the present day.

Examples of direct GHG emission sources include operation of the stationary source's combustion equipment (i.e., generator engines, boilers, emission control equipment, etc.), commercial heating and cooling equipment, motor vehicles, and offroad equipment. Examples of indirect GHG emission sources include electricity use, wastewater, and solid waste disposal.

Include the following in the submitted historical GHG emission estimates:

- a. Annual direct GHG emission estimates for each calendar year since cannabis manufacturing operations began until the present day.
- b. Annual indirect GHG emission estimates for each calendar year since cannabis manufacturing operations began until the present day.

- c. Documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the historical emission estimates.
  3. **Historical Solvent Usage.** In conjunction with the historical pollutant emission estimates for the stationary source, provide the following supporting solvent documentation:
    - a. Monthly solvent use records since cannabis manufacturing operations began until the present day. Include the solvent manufacturers, product names, MSDS (if not already submitted to the District), and volumes of solvent used.
    - b. Solvent purchase records, batch numbers, hazardous waste manifests, and/or other records required by the State of California and/or City of Lompoc cannabis licenses.
    - c. Fuel use records, hours of operation, receipts, utility provider usage/billing statements, or transport logs/manifests for all non-solvent emission sources.
  4. **Proposed Project Greenhouse Gas (GHG) Emissions.** Submit annual direct and indirect GHG emission calculations for the proposed ATC 15634 project. Include documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the proposed project's direct and indirect GHG emissions.
  5. **Process Flow Diagram Mass Balance.** Address the following mass balance inconsistencies in the submitted Project Solvent Flow Diagram:
    - a. 
    - b. 
- Note that this process flow diagram is the basis of the permitted emission calculations and the District wants to ensure that sufficient makeup solvent is permitted for this facility.
6. **Cold Trap Costs.** CCA's response to Item 4.a.iii in the December 2, 2021 incompleteness response letter provides the various capital costs, annual costs and indirect costs associated with the proposed cold trap system. Submit manufacturer invoice(s), quote(s), correspondence or other documentation showing where these values came from. In event that estimates were used for a capital cost, annual cost or indirect cost line item, provide a basis for the cost estimate.
  7. **Spent Biomass Technical Feasibility.** CCA's response to Item 4.b.i in the December 2, 2021 incompleteness response letter provides a technical analysis on why the additional flow from baked off solvents would cause icing issues in the proposed cold trap. Provide documentation or correspondence from the cold trap manufacturer confirming that their system would experience icing issues in this operational scenario.



8. **Technically Feasible Cold Trap System.** CCA's response to Item 4.b in the December 2, 2021 incompleteness response letter notes that connecting the proposed cold trap to ovens (to bake off entrained solvent in the spent biomass) and solvent cleaning operations is technically feasible but is not cost effective nor would work from an operations and de-icing standpoint. Address the following related to technically feasible cold trap systems:

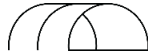
- a. Are there any larger cold traps which could handle the additional air flow and moisture from the ovens and solvent cleaning operations that would be more cost effective than 30 [REDACTED] units? If so, provide the costs (i.e., the various capital costs, annual costs and indirect costs noted in Items 4.b.iii.1 through 4.b.iii.7 in the November 2, 2021 application incompleteness letter) associated with this technically feasible cold trap setup.
- b. Could a condensate knockout be installed upstream of a cold trap(s) that could sufficiently remove enough moisture to prevent rapid ice buildup and allow the ovens, diamond lab and solvent cleaning operations to be controlled?

Submit supporting documentation including manufacturer correspondence, manufacturer specifications, and technical analyses to give context to your responses.

9. **Vacuum System Description.** Provide a description how the [REDACTED] [REDACTED] are degassed with using vacuum and the solvent vapors are routed to the cold trap. For example, is the oil run through a degassing system to remove entrained solvents, are the vessels and jars stored in containers or room that are maintained under constant vacuum, etc.

10. **Smaller Cold Trap Manufacturer Specifications.** Submit manufacturer specifications for the smaller cold traps equipped to the fume hood vents.

11. **Second Cold Trap.** CCA's response to Item 5 in the December 2, 2021 incompleteness response letter notes that "[a] second [REDACTED] cold trap is requested to be permitted strictly for redundancy reasons". Will a second [REDACTED] unit be installed? If not, please be aware that the District will not permit this second unit since it is District policy to only permit equipment which will be present at the facility.



[REDACTED]

March 4, 2022

Kevin Brown – Air Quality Engineer III  
Santa Barbara County Air Pollution Control District  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110

Re: Response to Incomplete Authority to Construct Application 15634

Dear Mr. Brown:

I am writing to acknowledge receipt of your Incomplete Authority to Construct Application 15634 letter dated December 23, 2021. Please find enclosed the written response and supporting documents. Items 1-4 are addressed within the attachment [REDACTED]

Additionally, we understand from conversations with District staff that the District has requested this information to determine whether the project is subject to the California Environmental Quality Act (“CEQA”). CCA has been in communication with the District regarding CEQA applicability. CCA intends to continue these discussions with the District.

Please note [REDACTED]

[REDACTED]

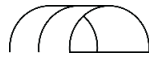
[REDACTED]

[REDACTED]

Finally, the previously submitted applications [REDACTED]

[REDACTED] The location change is reflected in the new process flow diagram. The equipment changes are reflected in the updated equipment list.

The following information and attachments are provided by CCA in response to the Incompleteness Item List set forth in the December 23, 2021 letter.



Kind regards,  
Matthew Allen  
General Counsel | CCA

**ATC NO. 15634 INCOMPLETENESS ITEM LIST**

1. **Historical Criteria Pollutant Emission Estimates.** Submit historical criteria pollutant emission estimates for the stationary source (i.e., [REDACTED]) from the time that cannabis manufacturing operations began until the present day. Criteria pollutants are defined as NO<sub>x</sub>, ROC, CO, SO<sub>x</sub>, PM, PM<sub>10</sub>, and PM<sub>2.5</sub>.

These estimates should include emissions from all stationary and mobile sources associated with the historical and existing cannabis manufacturing operations (i.e., solvents, generator engines, boilers, emission control equipment, motor vehicles, offroad equipment, etc.).

Include the following in the submitted historical criteria pollutant emission estimates:

- a. Annual emission estimates for each calendar year since cannabis manufacturing operations began until the present day.
- b. Average daily emissions estimates for each calendar year since cannabis manufacturing operations began until the present day.
- c. Average daily emissions estimates over the course of the facility's history.
- d. Peak daily emission estimates for each calendar year since cannabis manufacturing operations began until the present day.
- e. Peak daily emission estimates over the course of the facility's history.
- f. Documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the historical emission estimates.

The requested information for this item is available in the attached Air Quality Technical Analysis.

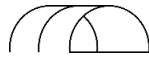
2. **Historical Greenhouse Gas (GHG) Emission Estimates.** Submit historical direct and indirect GHG emission estimates for the stationary source ([REDACTED]) from the time that cannabis manufacturing operations began until the present day.

Examples of direct GHG emission sources include operation of the stationary source's combustion equipment (i.e., generator engines, boilers, emission control equipment, etc.), commercial heating and cooling equipment, motor vehicles, and offroad equipment. Examples of indirect GHG emission sources include electricity use, wastewater, and solid waste disposal.

Include the following in the submitted historical GHG emission estimates:

- g. Annual direct GHG emission estimates for each calendar year since cannabis manufacturing operations began until the present day.
- h. Annual indirect GHG emission estimates for each calendar year since cannabis manufacturing operations began until the present day.
- i. Documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the historical emission estimates.

The requested information for this item is available in the attached Air Quality Technical Analysis.



3. **Historical Solvent Usage.** In conjunction with the historical pollutant emission estimates for the stationary source, provide the following supporting solvent documentation:
  - a. Monthly solvent use records since cannabis manufacturing operations began until the present day. Include the solvent manufacturers, product names, MSDS (if not already submitted to the District), and volumes of solvent used.
  - b. Solvent purchase records, batch numbers, hazardous waste manifests, and/or other records required by the State of California and/or City of Lompoc cannabis licenses.
  - c. Fuel use records, hours of operation, receipts, utility provider usage/billing statements, or transport logs/manifests for all non-solvent emission sources.

The requested information for this item is available in the attached Air Quality Technical Analysis.

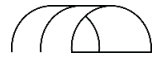
4. **Proposed Project Greenhouse Gas (GHG) Emissions.** Submit annual direct and indirect GHG emission calculations for the proposed ATC 15634 project. Include documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the proposed project's direct and indirect GHG emissions.

The requested information for this item is available in the attached Air Quality Technical Analysis.

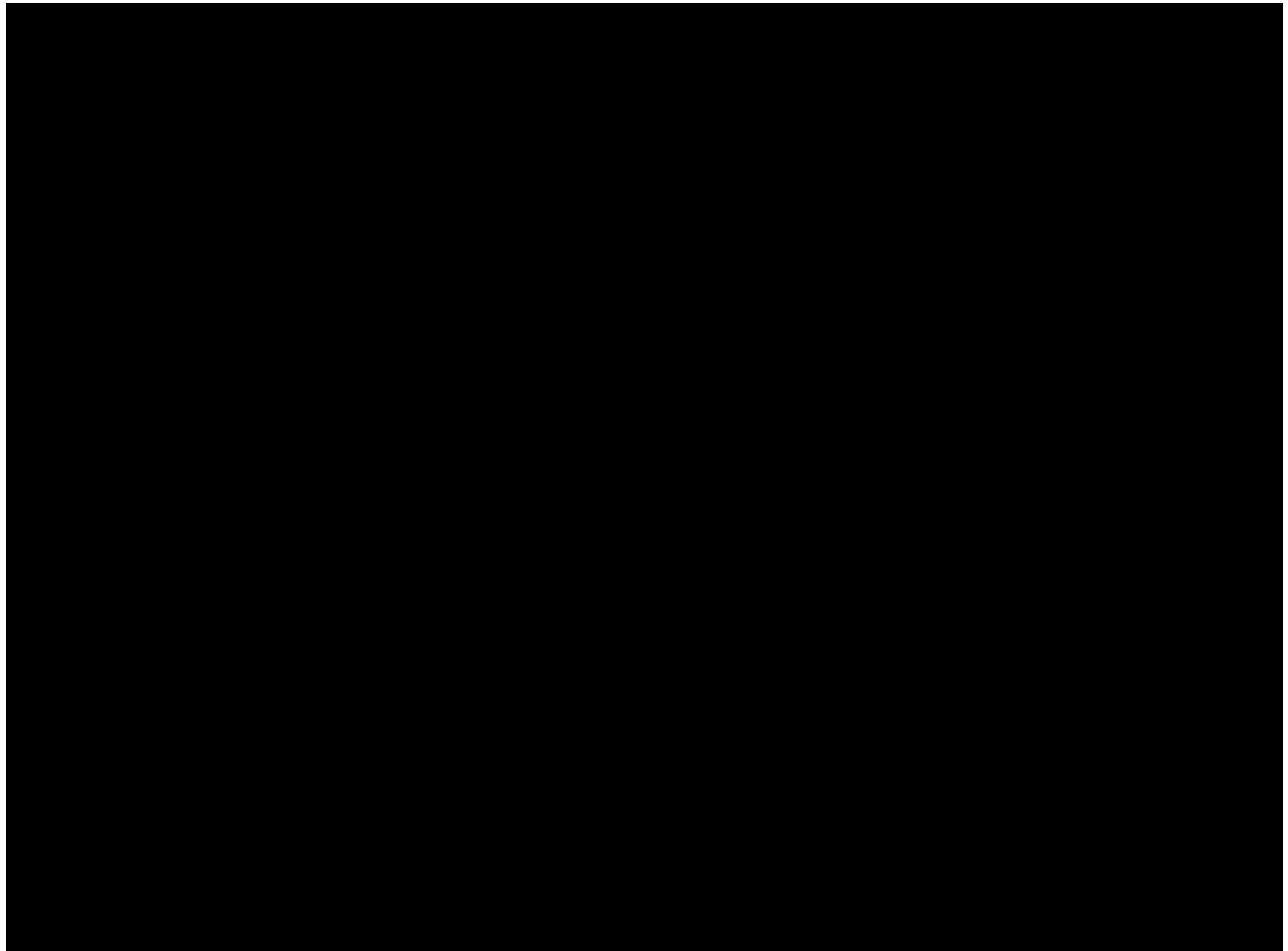
5. **Process Flow Diagram Mass Balance.** Address the following mass balance inconsistencies in the submitted [REDACTED]

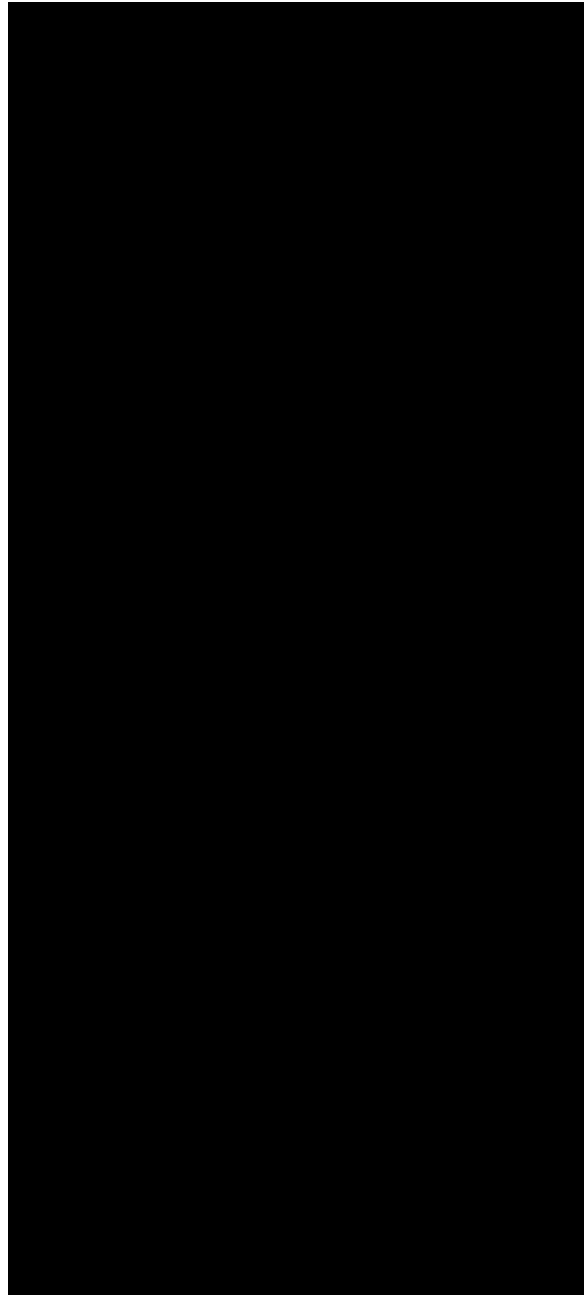
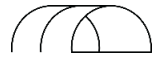
- [REDACTED]
- [REDACTED]

[REDACTED] Iso, refer to the synced Form-104 for detailed emission calculations.

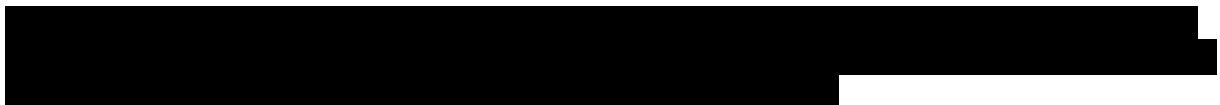


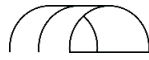
**4/21/2022 Flow Diagram**





*Figure 1: Flow Diagram*





[REDACTED]

6. **Cold Trap Costs.** CCA’s response to Item 4.a.iii in the December 2, 2021 incompleteness response letter provides the various capital costs, annual costs and indirect costs associated with the proposed cold trap system. Submit manufacturer invoice(s), quote(s), correspondence or other documentation showing where these values came from. In the event that estimates were used for a capital cost, annual cost or indirect cost line item, provide a basis for the cost estimate. *See attached spreadsheet,*

[REDACTED]

7. **Spent Biomass Technical Feasibility.** CCA’s response to Item 4.b.i in the December 2, 2021 incompleteness response letter provides a technical analysis on why th [REDACTED] Provide documentation or correspondence from the cold trap manufacturer confirming that their system would experience icing issues in this operational scenario.

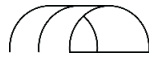
[REDACTED]

8. **Technically Feasible Cold Trap System.** CCA’s response to Item 4.b in the December 2, 2021 incompleteness response letter notes that [REDACTED]

[REDACTED] Address the following related to technically feasible cold trap systems:

a. Are there any larger cold traps which could handle the additional air flow and moisture from the ovens and solvent cleaning operations that would be more cost effective than [REDACTED] If so, provide the costs (i.e., the various capital costs, annual costs and indirect costs noted in Items 4.b.iii.1 through 4.b.iii.7 in the November 2, 2021 application incompleteness letter) associated with this technically feasible cold trap setu [REDACTED]

[REDACTED]



b. Could a [REDACTED]  
[REDACTED]  
cleaning operations to be controlled?  
[REDACTED]

Submit supporting documentation including manufacturer correspondence, manufacturer specifications, and technical analyses to give context to your responses. See [REDACTED], attached, [REDACTED] [REDACTED] Request for Quote - [REDACTED]

9. **System Description.** Provide a description how the 5 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

10. **Smaller [REDACTED] Manufacturer Specifications.** Submit manufacturer specifications for the smaller [REDACTED] equipped to the [REDACTED].

j. See Attachment [REDACTED]

11. **Second [REDACTED].** [REDACTED] response to Item 5 in the December 2, 2021 incompleteness response letter notes that [REDACTED] unit be installed? If not, please be aware that the District will not permit this second unit since it is District policy to only permit equipment which will be present at the facility. **The current plan and requested permitted action is listed in the updated equipment list.**



04/08/2022 Chestnut Laurel EQ List				
	Brief Equipment Description	Associated Process	Number of Units	Touches Solvent (Y/N)
	Vacuum Sealer for lg flower bags	Post-processing Flower	3	N
	Rolling machine	Rolling Machine	1	N
	Distillation	Upper 20 Batch (flasks)	3	N
	Closed-loop hydrocarbon Extractor	Volatile Extraction	10	Y
	carbon scrubber	Odor mitigation	2	Y
	Carbon scrubber	Odor mitigation	1	Y
	Solvent/Solute Holding Cauldron	Mechanical Extraction	16	Y
	Fresh Frozen Material Columns	Mechanical Extraction	4	Y
	Solvent Holding Columns	Mechanical Extraction	4	Y
	Vacuum Oven	Dab Lab Purging Refinement	6	Y
	Bake Out Oven	Vessel Cleaning	3	N
	Freezer	Storage	1	N
	Crystal Production System	Isolate Refinement	3	Y
	Homogenizer	Vape Lab Refinement	1	N
	Oil Mist Filter	Mist Filtration & Odor reduction	21	N
	Vacuum Pump	Vacuum Application	8	Y
	Vacuum Pump	Vacuum Application	3	Y
	Cannabis Sorting instrument	Post-processing Flower	1	N
	Fume Hood	Fume Hood	2	N
	3D printer	Isopropyl Alcohol Wash	1	N
	Fume Hood	Fume Hood	1	Y
	Particle Size Separation	Isolate Refinement	1	Y
	grinder	Post-processing Flower	1	N
	Solvent Recovery System	Post Refinement Recovery	2	Y
	Chiller	Mechanical Extraction	2	N
	Chiller	Mechanical Extraction	1	N
	Joint filling	Post-processing Flower	1	N
	moisture analysis	Moisture analysis	1	N
	Pump for pulling vacuum on vessels	Mechanical Extraction	4	Y
	Botritis and stem sort	Post-processing Flower	1	N
	grinder	Post-processing Flower	1	N
	sizing sorting	Post-processing Flower	1	N
	Grinder	Post-processing Flower	2	N
	Freezer	Seed storage 2nd vault	1	N
	Tunnel Dryer	Drying labware or dishes	1	N
	Freeze dryer 2 carts	Processing FF	1	N
	Ultrasonic Washer	Dishwashing	2	N
	pouch sealing	Sealing Packages	2	N
	Distillation	Vape Lab Refinement	2	N
	Double Cone Blender	Post-processing Flower	1	N
	Sifter for the ground flower	Post-processing Flower	1	N
	Fresh Frozen Material Storage	Flower Storage	2	N
	Fresh Frozen Material Storage	Flower Storage	6	N
	Chiller	Mechanical Extraction	10	N
	Cartridge Filling Machine	Packaging	6	N
	Mouthpiece Fastener	Packaging	5	N
	Trimmer for whole buds	Post-processing Flower	1	N
	Centrifuge	Mechanical Extraction	2	Y
	Work in progress room	Post-processing Flower	1	N

BIP -45F 43'9"x8'W x9' H  
 Freezer for tray prep and FF storage  
 Reaction Vessel  
 15 HP air compressor  
 Liquid Accumulation Drum  
 Shell and Tube Heat Exchanger  
 Filter Fan  
 Vacuum Pump  
 Vacuum Pump  
 Mechanical Pump  
 Air Compressor  
 Vacuum Pump  
 Vacuum Pump  
 Air Compressor  
 Filter  
 Chiller  
 Oil Storage  
 Cold Trap  
 LN2 Holder  
 Vacuum Pump  
 LPG Pump  
 Chiller  
 Chiller  
 Rotovap  
 Chiller  
 Vacuum  
 Vacuum Controller  
 HEPA Vacuum  
 Cold Trap  
 [REDACTED]  
 Column  
 Vessel  
 Vessel  
 Reactor / Motor  
 Chiller  
 Filter  
 Reactor / Motor  
 Chiller  
 Chiller  
 Freeze Dryer

FF storage	1	N
Processing FF	1	N
Isolate Refinement	1	Y
Air compressor for optical sorter and aux	1	N
Solvent Recovery	1	Y
Solvent Recovery	1	Y
Odor mitigation	1	Y
Vape Lab Refinement	3	N
Isolate Refinement	1	N
Mechanical Extraction	10	N
General	1	N
Post-processing Flower	1	N
Processing FF	1	N
Processing FF	1	N
Isolate Refinement	2	Y
Isolate Refinement	1	N
Storage	30	Y
Post Refinement	6	Y
Solvent Recovery	1	Y
Solvent Recovery	1	Y
Solvent Recovery	1	Y
Booth 4	1	N
Booth 4	3	N
Booth 4	2	Y
Booth 4	4	Y
Booth 4	2	N
Booth 4	2	N
Booth 4	1	N
Booth 4	1	Y
Booth 4	2	Y
Booth 4	4	Y
Booth 4	4	Y
Booth 4	4	Y
Booth 4	2	Y
Booth 4	1	N
Booth 4	1	Y
Booth 4	2	Y
Booth 4	1	N
Booth 4	1	N
Post-Processing Flower	1	N

**From:** [Jacob Nacorda](#)  
**To:** [Kevin M. Brown](#)  
**Cc:** [Laura Nuzzo](#); [Ryan Elliott](#); [Matthew Allen](#); [Andriana Villalpando](#)  
**Subject:** Re: 1201 Chestnut APCD application  
**Date:** Monday, May 16, 2022 10:52:09 AM  
**Attachments:** [Project Solvent Flow Diagram 220512r0 - Page 1 \(2\).pdf](#)  
[Quote #32280\\_CCA I-80 Max Chiller \(2\).pdf](#)

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Kevin,

Please see the attached flow chart with new estimates for solvent flow [REDACTED]

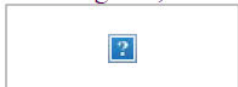
[REDACTED]  
[REDACTED]  
[REDACTED] Capturing the smaller portion of solvent from the oven exhaust is difficult because water may freeze, obstructing our equipment, and oxygen creates a hazardous environment. We are working to create solutions that meet both APCD and safety requirements.

[REDACTED]  
[REDACTED] It is unlikely this purge could be consistently recovered because the recovery systems are sensitive to these molecules. Thus, we will lose an unknown amount of solvent during this purge process.

CCA does utilize [REDACTED] in the plant; for example, the [REDACTED]

This [REDACTED] will not work for this application as the chiller is not strong enough to condense [REDACTED]. Attached is a quote for a [REDACTED] with the cooling capacity required. Implementation would also require extra space, vessels, desiccant, and plumbing. The chiller, facility modifications, and additional equipment would make capturing these small emissions not cost effective.

Kind regards,



**Jacob Nacorda, EIT**  
Engineer I, Chemical Process | CCA  
(818) 667-8912

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On Thu, May 5, 2022 at 12:45 PM Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)> wrote:

Good Afternoon Lindsay,

Hope everything is going well. I reviewed the latest incompleteness response for ATC 15634 that was submitted on April 25<sup>th</sup>. After my review, I have one more engineering question as it relates to the Dab Lab and BACT.

- The District understands the flowrate issue with connecting the Dab Lab's [REDACTED], but we cannot determine a technical reason why the [REDACTED]. Vacuum ovens typically do not have high flowrates due to the nature of their construction and operation. Additionally, the oven ducting should be able to be connected [REDACTED]. This would allow the solvents entrained in the produced cannabis oils to be controlled. Please let me know if controlling emissions from the Dab Lab vacuum ovens is technically feasible and/or cost effective. If it is, please submit a revised process flow diagram and updated emission calculations.

I'm open tomorrow as well as Monday through Thursday of next week to discuss with you or any of your staff. Appreciate the help.

Thank you,



**Kevin Brown**

Air Quality Engineer III  
Air Pollution Control District  
Santa Barbara County

[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)

Office: (805) 979-8313

Cell: (858) 776-7045

[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

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**From:** Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>  
**Sent:** Wednesday, April 27, 2022 2:33 PM  
**To:** Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>  
**Cc:** Matthew Allen <[matthew@ccagriculture.com](mailto:matthew@ccagriculture.com)>; Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>; Steve Ward <[steve@ccagriculture.com](mailto:steve@ccagriculture.com)>  
**Subject:** Re: 1201 Chestnut APCD application

Hi Kevin,

Here is the Excel Workbook. Let me know if you have any questions on it.

Regards,  
Laura

**Laura M. Nuzzo**

President/Senior Environmental Engineer

**NUZZO ENVIRONMENTAL, INC.**

*Certified Small Business (SB)/Disabled Veteran Business Enterprise (DVBE)*

176 Seacliff Drive

Pismo Beach CA 93449

805-441-8496

[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)

On 2022-04-26 10:43 am, Kevin M. Brown wrote:

Matthew,

Can I get the Excel files used for the calculations?

Thanks,



**Kevin Brown**

Air Quality Engineer III  
Air Pollution Control District  
Santa Barbara County

[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)

Office: (805) 979-8313

Cell: (858) 776-7045

[ourair.org](http://ourair.org) [@OurAirSBC](https://twitter.com/OurAirSBC)

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**From:** Matthew Allen <[matthew@ccagriculture.com](mailto:matthew@ccagriculture.com)>  
**Sent:** Monday, April 25, 2022 4:26 PM  
**To:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>  
**Cc:** Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>; Steve Ward <[stevev@ccagriculture.com](mailto:stevev@ccagriculture.com)>; Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>  
**Subject:** Re: 1201 Chestnut APCD application

Kevin: Please find attached our response to Incomplete Authority to Construct Application 15634 letter dated December 23, 2021. We realize that this has taken a while to turn back to you and appreciate your patience.

Thanks

Matt

On Thu, Nov 19, 2020 at 12:09 PM Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)> wrote:

Hi Kevin,

The check for the fees should be going out in the mail today. Here is a revised Form-01 that has not been redacted that does not contain confidential information.

Thank you,



**Lindsay Cokeley**

Compliance Supervisor | CCA

(818) 317-8414

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On Thu, Nov 19, 2020 at 11:02 AM Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)> wrote:

Lindsay,

Appreciate the clarification on the facility location.

For the confidential redactions of the application, at a minimum, the owner and operator cannot be redacted from the permit. This information is public record. Please review the District's Policies and Procedures as well as California Government Code Section 6254.7 regarding confidential information (to confirm that the rest of the application is confidential (link: <https://www.ourair.org/wp-content/uploads/6100-020-1.pdf>)).

The District thinks that a meeting via Team or Zoom would be helpful so we can get on the same page regarding the confidential information and how that affects the permitting process. Let me know if you are open to having this meeting and I'll set one up.

Please note that the permit application has been deemed incomplete for the time since we are waiting for the application fee to arrive. When we receive that fee and, if needed, have a meeting regarding the confidential information, I will do a full review of the permit application.



**Kevin Brown**

Air Quality Engineer III  
Air Pollution Control District  
Santa Barbara County

[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)

Office: (805) 961-8826

Cell: (858) 776-7045

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**From:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

**Sent:** Wednesday, November 18, 2020 2:33 PM

**To:** Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>

**Subject:** 1201 Chestnut APCD application

Hi Kevin,

I received your call on Monday - just wanting to touch base with you on the application. You are correct in that there is already a Facility ID for the 1201 Chestnut location - this was created when we applied for an emergency backup generator for the building. Also, are there specific parts of the application that cannot be redacted? I'm happy to unredact items that are in Form-01, however the majority of form 104 and any associated attachments we consider to be proprietary and do not want to be subject to public record. Let me know if you have any further questions.

Thank you,



**Lindsay Cokeley**

Compliance Supervisor | CCA



(818) 317-8414

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--

**Matthew Allen**

General Counsel | CCA

(805) 286 – 8764

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Ms. Lindsay Cokeley  
Central Coast Agriculture  
85 W. Highway 246, #233  
Buellton, CA 93427

FID: 11664  
Permit: A 15634  
SSID: 11415

Re: Incomplete Authority to Construct Application 15634

Dear Ms. Cokeley:

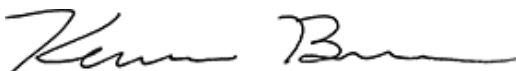
On November 23, 2020, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC) No. 15634 for a cannabis processing facility. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please be advised that construction of your facility without a **final** ATC is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 961-8826. Thank you for your cooperation.

Sincerely,



Kevin Brown, Air Quality Engineer III  
Engineering Division

Attachment: Incompleteness Items

cc: Central Coast Agriculture - Chestnut Ave. 11664 Project File  
Engr Chron File  
Jacob Nacorda  
Laura Nuzzo  
Ryan Elliot  
Matthew Allen  
Andriana Vilalpando  
Carly Barham

\\sbapcd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture\ATCs\ATC 15634\ATC 15634 - ATC Incompleteness - 10-28-2021

Aeron Arlin Genet, Air Pollution Control Officer

805.961.8800 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 [ourair.org](http://ourair.org) @OurAirSBC

ATTACHMENT

**ATC NO. 15634 INCOMPLETENESS ITEM LIST**

General Incompleteness Items:

1. **Confidential Information.** If Central Coast Agricultural still considers information contained in the permit application to be confidential, submit confidential and redacted versions of the April 25, 2021 incompleteness response submittal per the District's Policies and Procedures as well as California Government Code Section 6254.7. Additionally, submit confidential and redacted versions of the responses to this incompleteness letter. Disregard this item if Central Coast Agricultural no longer considers the submitted application information to be confidential.

Engineering Incompleteness Items: Please contact Kevin Brown at [BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org), (805) 979-8313 or (858) 776-7045 with any questions or comments regarding the items below.

2. **Spent Biomass Additional Emissions Control.** Address the following items related to controlling emissions from solvents entrained in spent biomass:
  - a. Following the 90% removal of the entrained solvent in the spent biomass from the "Closed Loop Process – Remove Solvent from Biomass", is there a technically feasible control technology to remove some or all the remaining 10% (equivalent to 58 pounds per day) of entrained solvent in the spent biomass? Provide a description of why or why not it is technically feasible to control this source of ROC emissions.
  - b. For each feasible control technology ( [REDACTED] ), provide a description of the process and technology. If there is not a feasible control technology, provide a description and/or technical analysis why there are no feasible control technologies to control this source of emissions.
  - c. To conduct cost effectiveness calculations, provide the initial capital cost for every feasible control technology. Alternatively, cite a previously submitted control technology initial capital cost (i.e., Rotovap and chillers, cryogenic condenser, etc.).

Planning Incompleteness Items: Please contact Carly Barham at [BarhamC@sbcapcd.org](mailto:BarhamC@sbcapcd.org) with any questions or comments regarding the items below.

3. **Solvent Documentation.** In Item 3 of the District's December 23, 2021 letter, the District asked for the following historical solvent documentation:
  - a. "Monthly solvent use records since cannabis manufacturing operations began until the present day. Include the solvent manufacturers, product names, MSDS (if not already submitted to the District), and volumes of solvent used.
  - b. Solvent purchase records, batch numbers, hazardous waste manifests, and/or other records required by the State of California and/or City of Lompoc cannabis licenses.

- c. Fuel use records, hours of operation, receipts, utility provider usage/billing statements, or transport logs/manifests for all non-solvent emission sources.”

These items were not addressed in the latest submittal. Please submit requested information

4. **Utility Statements.** To support the proposed project’s estimated annual electricity consumption (kWh) and the historical annual electricity consumption (kWh) cited for project operations in 2019, 2020, and 2021, provide utility providers usage/billing statements for historical electricity consumption. If this information is unavailable, please provide an explanation for how the stated usage was developed.
5. **Electricity Consumption.** Regarding the proposed project’s estimated annual electricity consumption of 1,354,120 kWh per year, the District notes that this estimate is only 6 kWh per year greater than 2021 energy consumption. Please explain how this estimate was developed.

In addition, please confirm its accuracy given that the project proposes to install various pieces of equipment that require electricity, including (but not limited to) seven (7) additional closed-loop hydrocarbon extractors, cryogenic condensers, a fume hood, vacuum ovens, etc.

6. **Excel Workbook “Solvent Facility AQTR V1.xlsx”.** Address the following items related to the submitted Excel Workbook.
  - a. **“Proposed Project” Tab.** The Chestnut Emergency Diesel Engine and the Laurel Emergency Diesel Engine are each permitted for up to 2 hours/day and 25 hours/year of operation. Please correct the assumed daily hours for both engines, and the annual hours of operation for the Chestnut Emergency Diesel Engine.
  - b. **“Proposed Project”, “2021”, “2020”, and “2019” Tabs.** For the Diesel Equipment Emission Factors, revise the emission factors to be consistent with the factors found in your District permits for these engines (ATC-PTO Mod 15344-01 and ATC-PTO 15650). The NO<sub>x</sub> and ROC emission factors should not be merged.
  - c. **“Proposed Project”, “2021”, “2020”, and “2019” Tabs.** For the building water heater, please review the following documents and apply the appropriate emission factors for the heater based on its cited rating of 0.190 MMBtu/hr: [www.ourair.org/wp-content/uploads/SBCAPCD-External-Combustion-Emission-Factors-Revision-2-.pdf](http://www.ourair.org/wp-content/uploads/SBCAPCD-External-Combustion-Emission-Factors-Revision-2-.pdf).

If the equipment is certified with South Coast AQMD apply the Rule 360 emission factors. A list of South Coast AQMD certified boilers can be found here: <https://www.ourair.org/wp-content/uploads/OldSCAQMDCertificationList.pdf> and <http://www.aqmd.gov/docs/default-source/permitting/1146-2-boiler-list/rule-1146-2-certified-boilers.xlsx?sfvrsn=34>. If the heater is not certified, use the uncontrolled factor.

More information can be found on the District’s website at <https://www.ourair.org/rule-360-comp/>.

- d. **“Proposed Project”, “2021”, “2020”, and “2019” Tabs.** Address the following related to the vehicle emission calculation assumptions:
- i. Confirm and provide an explanation the calculation in the “daily trip miles/vehicle” cells (i.e., cells H10 and H11 on the “Proposed Project” tab and cells H9 and H10 on the “2021”, “2020” and “2019” tabs). It is unclear if the proper/accurate calculation is being performed based on the data provided.
  - ii. Please confirm that daily emissions are based on the total mileage per day from all vehicles.
  - iii. According to the District ATC application, the facility will operate/operates 24 hours per day, 7 days per week, 52 weeks per year. Therefore, it may be reasonable to assume employee trips and/or other vehicle trips could be generated by the facility 365 days per year. Please confirm that the operational days per year for the *CCA Employee Vehicles* and *Contractor Vehicles* are accurate at only 75 days per year and 12 days per year respectively. If so, please explain.
  - iv. Ensure that for the “Proposed Project”, “2021”, and “2020” tabs, that emissions are based on the project information for the relevant year. Currently, it appears that data for 2019 is being utilized in the calculation for cell K10 and therefore the resultant emissions for “Proposed Project”, “2021”, and “2020” are based on 2019 activity data and not the specific data for the relevant year.
- e. [REDACTED]. Address the following related to the solvent [REDACTED]
- i. Provide context and an explanation for the [REDACTED]  
[REDACTED]
  - ii. Provide supporting documentation for the [REDACTED] purchased as previously identified in comment 1.a. and 1.b.

July 1, 2022

Central Coast Agriculture, LLC  
Attn: Andriana Villalpando  
85 W. Highway 246, #233  
Buellton, CA 93427

Electronic [andriana@ccagriculture.com](mailto:andriana@ccagriculture.com)

Re: Incomplete Authority to Construct Application 15634: CEQA Lead Agency Review

Dear Andriana Villalpando:

On November 23, 2020, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC) No. 15634 for a cannabis processing facility in the City of Lompoc. Subsequently, the District determined that it will be a lead agency under the California Environmental Quality Act (CEQA) for this project. On December 23, 2021 and again on May 18, 2022, the District requested information (see attached) regarding the existing and proposed operations of your project, in order to quantify all sources of air pollutant emissions and to determine the environmental baseline of the existing operations at the facility. To date, the District has not received an adequate response to this request. July

The purpose of this letter is to notify you that if adequate information related to the facility's environmental baseline is not received by **July 14, 2022**, the District will proceed with review of the project's environmental effects based on an assumption of no previous operations (i.e. "zero" air pollutant emissions baseline).

Pursuant to the requirements of CEQA Guidelines Section 15063, the District will conduct an Initial Study to determine whether the project may have a significant effect on the environment and determine the level of environmental review that is required. The District will then proceed with issuance of a Request for Proposal (RFP) for the preparation of the environmental document by an independent contractor. We expect that the RFP will be issued on or before September 1, 2022.

If you have any questions regarding this request or wish to discuss any of the issues presented above, please contact me at [HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org) or (805) 979-8311. Thank you for your cooperation.

Sincerely,



David Harris, Manager  
District Engineering Division

enc: CEQA Information Required

cc: Central Coast Agriculture - Chestnut Ave. 11664 Project File  
Engr Chron file  
Planning Chron File  
Molly Pearson, Manager, District Planning Division (email only)  
Carly Barham, District Planning Division (email only)  
William Sarraf, Supervisor, District Engineering Division (email only)

\\sbcapcd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture - Chestnut Ave\ATCs\ATC 15634\2022-06-30 ATC 15634 CEQA Review Letter.docx

**Aeron Arlin Genet**, Air Pollution Control Officer

ATTACHMENT

**CEQA Information Required**

1. **Historical Solvent Usage.** In conjunction with the historical pollutant emission estimates for the stationary source, provide the following supporting solvent documentation:
  - a. Monthly solvent use records since cannabis manufacturing operations began until the present day. Include the solvent manufacturers, product names, MSDS (if not already submitted to the District), and volumes of solvent used.
  - b. Solvent purchase records, batch numbers, hazardous waste manifests, and/or other records required by the State of California and/or City of Lompoc cannabis licenses.
  - c. Fuel use records, hours of operation, receipts, utility provider usage/billing statements, or transport logs/manifests for all non-solvent emission sources.
2. **Utility Statements.** To support the proposed project's estimated annual electricity consumption (kWh) and the historical annual electricity consumption (kWh) cited for project operations in 2019, 2020, and 2021, provide utility providers usage/billing statements for historical electricity consumption. If this information is unavailable, please provide an explanation for how the stated usage was developed.
3. **Electricity Consumption.** Regarding the proposed project's estimated annual electricity consumption of 1,354,120 kWh per year, the District notes that this estimate is only 6 kWh per year greater than 2021 energy consumption. Please explain how this estimate was developed.

In addition, please confirm its accuracy given that the project proposes to install various pieces of equipment that require electricity, including (but not limited to) seven (7) additional closed-loop hydrocarbon extractors, cryogenic condensers, a fume hood, vacuum ovens, etc.

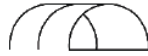
4. **Excel Workbook "Solvent Facility AQTR V1.xlsx".** Address the following items related to the submitted Excel Workbook.
  - a. **"Proposed Project", "2021", "2020", and "2019" Tabs.** Address the following related to the vehicle emission calculation assumptions:
    - i. Confirm and provide an explanation the calculation in the "daily trip miles/vehicle" cells (i.e., cells H10 and H11 on the "Proposed Project" tab and cells H9 and H10 on the "2021", "2020" and "2019" tabs). It is unclear if the proper/accurate calculation is being performed based on the data provided.
    - ii. Please confirm that daily emissions are based on the total mileage per day from all vehicles.
    - iii. According to the District ATC application, the facility will operate/operates 24 hours per day, 7 days per week, 52 weeks per year. Therefore, it may be reasonable to assume employee trips and/or other vehicle trips could be generated by the facility 365 days per year. Please confirm that the operational days per year for the *CCA Employee Vehicles* and *Contractor Vehicles* are accurate at only 75 days per year and 12 days per year respectively. If so, please explain.

ATTACHMENT

**CEQA Information Required**

- b. [REDACTED] Address the following related to the solvent [REDACTED]
  - i. Provide context and an explanation for the [REDACTED]  
[REDACTED]
  - ii. Provide supporting documentation for the [REDACTED] purchased as previously identified in comment 1.a. and 1.b.





CENTRAL COAST AGRICULTURE, INC.

85 W HWY 246 #233, Buellton, CA 93427

July 13, 2022

Kevin Brown  
Air Quality Engineer III  
Santa Barbara County Air Pollution Control District  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110

**Re: Response to Incomplete Authority to Construct Application 15634**

Dear Mr. Brown:

Under the above-referenced ATC application for a cannabis facility located at 1201 W Chestnut Ave. in Lompoc, Central Coast Agriculture (CCA) is providing this response to the **incompleteness item list** outlined in your letter dated May 18, 2022.

**This submittal serves two purposes:**

1. Respond to the matters addressed in your May 18th incompleteness letter; and
2. Incorporate additional revisions CCA is proposing as a result of further refinement of needed equipment and processing efficiencies;
  - a. **Proposed equipment revisions.**



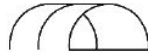
Note: The proposed equipment does not consume fuel. There will be no change in process Solvent used for this equipment.

**General Incompleteness Items:**

1. **Confidential Information.** If Central Coast Agricultural still considers information contained in the permit application to be confidential, submit confidential and redacted versions of the April 25, 2021 incompleteness response submittal per the District's Policies and Procedures as well as California Government Code Section 6254.7. Additionally, submit confidential and redacted versions of the responses to this incompleteness letter. Disregard this item if Central Coast Agricultural no longer considers the submitted application information to be confidential.

*A redacted version of the April 25, 2021 incompleteness response is attached seperately.*

2. **Spent Biomass Additional Emissions Control.** Address the following items related to controlling emissions from solvents entrained in spent biomass:



- a. Following the 90% removal of the entrained solvent in the spent biomass from the “Closed Loop Process – Remove Solvent from Biomass”, is there a technically feasible control technology to remove some or all the remaining 10% ( [REDACTED] ) of entrained solvent in the spent biomass? Provide a description of why or why not it is technically feasible to control this source of ROC emissions.

[REDACTED]

- b. For each feasible control technology ( [REDACTED] ), provide a description of the process and technology. If there is not a feasible control technology, provide a description and/or technical analysis why there are no feasible control technologies to control this source of emissions.

No new processes will be used as per 2a.

- c. To conduct cost effectiveness calculations, provide the initial capital cost for every feasible control technology. Alternatively, cite a previously submitted control technology initial capital cost ( [REDACTED] ).

No new processes will be used as per 2a.

*Planning Incompleteness Items:* Please contact Carly Barham at [BarhamC@sbcapcd.org](mailto:BarhamC@sbcapcd.org) with any questions or comments regarding the items below.

3. **Solvent Documentation.** In Item 3 of the District’s December 23, 2021 letter, the District asked for the following historical solvent documentation:

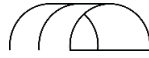
- a. “Monthly solvent use records since cannabis manufacturing operations began until the present day. Include the solvent manufacturers, product names, MSDS (if not already submitted to the District), and volumes of solvent used.

CCA’s internal solvent tracking has been fine-tuned for concise reporting in accordance with permitting requirements. To avoid confusion with the “Solvent Purchase Receipt History” spreadsheet, our internal reporting is not included in this letter due to inconsistencies. The solvent internal tracking system was created mid-2021 and was down for periods of time. CCA has worked diligently over the past year to rectify the web form and provide adequate training to authorized employees utilizing solvents.

See the attached for MSDS. Please note the solvent manufacturers and product names are included on each MSDS.

- b. Solvent purchase records, batch numbers, hazardous waste manifests, and/or other records required by the State of California and/or City of Lompoc cannabis licenses.

See attachment “Solvent Purchase Receipt History” for solvent purchase records and batch



numbers. This summary includes the total amount of solvent that was vendor invoiced starting in 2021. The sheet was derived from CCA's Enterprise Resource Planning (ERP) software, Sage, which was implemented beginning January 2021. These are the accessible and most up-to-date records on file.

See attachment for historical hazardous waste manifests records.

- c. Fuel use records, hours of operation, receipts, utility provider usage/billing statements, or transport logs/manifests for all non-solvent emission sources.”.

See attached for the following:

1. Generator Logs; monthly logs of stop and start times
2. Gas Bill Summary; Online records do not predate 05/2020
3. Company Vehicle Miles Traveled; These records account for CCA's 3 high-mileage company vehicles. Record keeping began 11/2021

Please note that these are the available and most up-to-date records on file.

- d. These items were not addressed in the latest submittal. Please submit requested information.

Historical solvent purchase tracking began in 2021 when CCA implemented a company-wide ERP software (See 3b.). The records provided by CCA are the available and most up-to-date information that is accessible via historic records.

- 4. **Utility Statements.** To support the proposed project's estimated annual electricity consumption (kWh) and the historical annual electricity consumption (kWh) cited for project operations in 2019, 2020, and 2021, provide utility providers usage/billing statements for historical electricity consumption. If this information is unavailable, please provide an explanation for how the stated usage was developed.

Copies of the Chestnut/Laurel utility billing statements from 2019, 2020, 2021, and 2022 are attached.

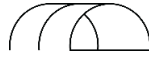
- 5. **Electricity Consumption.** Regarding the proposed project's estimated annual electricity consumption of 1,354,120 kWh per year, the District notes that this estimate is only 6 kWh per year greater than 2021 energy consumption. Please explain how this estimate was developed.

In addition, please confirm its accuracy given that the project proposes to install various pieces of equipment that require electricity, including (but not limited to) seven (7) additional closed-loop hydrocarbon extractors, cryogenic condensers, a fume hood, vacuum ovens, etc.

The proposed projects estimated energy consumption has been modified as seen in the emissions calculations. It is an estimate based on 1.5 times the 2021 usage.

Please see the updated equipment list. We confirm that, with our current knowledge, this is the best estimate of electricity consumption. Hydrocarbon extractors and cryogenic condensers do not require electricity, except for controls.

Note: The new equipment proposed in this response has been included in the estimate above.



6. **Excel Workbook “Solvent Facility AQTR V1.xlsx”.** Address the following items related to the submitted Excel Workbook.

- a. **“Proposed Project” Tab.** The Chestnut Emergency Diesel Engine and the Laurel Emergency Diesel Engine are each permitted for up to 2 hours/day and 25 hours/year of operation. Please correct the assumed daily hours for both engines, and the annual hours of operation for the Chestnut Emergency Diesel Engine.

The daily and annual hours of operation have been revised to the permitted hours of 2 hours/day and 25 hours/year.

- b. **“Proposed Project”, “2021”, “2020”, and “2019” Tabs.** For the Diesel Equipment Emission Factors, revise the emission factors to be consistent with the factors found in your District permits for these engines (ATC-PTO Mod 15344-01 and ATC-PTO 15650). The NOx and ROC emission factors should not be merged.

Emission factor is revised to reflect the information found in our District permits.

- c. **“Proposed Project”, “2021”, “2020”, and “2019” Tabs.** For the building water heater, please review the following documents and apply the appropriate emission factors for the heater based on its cited rating of 0.190 MMBtu/hr: [www.ourair.org/wp-content/uploads/SBCAPCD-External-Combustion-Emission-Factors-Revision-2-.pdf](http://www.ourair.org/wp-content/uploads/SBCAPCD-External-Combustion-Emission-Factors-Revision-2-.pdf)

If the equipment is certified with South Coast AQMD apply the Rule 360 emission factors. A list of South Coast AQMD certified boilers can be found here:

<https://www.ourair.org/wp-content/uploads/OldSCAQMDCertificationList.pdf> and <http://www.aqmd.gov/docs/default-source/permitting/1146-2-boiler-list/rule-1146-2-certified-boilers.xlsx?sfvrsn=34>. If the heater is not certified, use the uncontrolled factor.

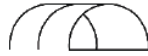
More information can be found on the District’s website at <https://www.ourair.org/rule-360-comp/>

The appropriate emission factor based on the cited rating has been applied.

- d. **“Proposed Project”, “2021”, “2020”, and “2019” Tabs.** Address the following related to the vehicle emission calculation assumptions:

- i. Confirm and provide an explanation the calculation in the “daily trip miles/vehicle” cells (i.e., cells H10 and H11 on the “Proposed Project” tab and cells H9 and H10 on the “2021”, 2020” and “2019” tabs). It is unclear if the proper/accurate calculation is being performed based on the data provided.

CCA management staff estimated the amount of employee commute/employee onsite mileage, vendors, contractors, delivery vehicles, etc. Additional discussion occurred and the values for the vehicle mileage were updated.



- ii. Please confirm that daily emissions are based on the total mileage per day from all vehicles.

Daily emissions values have been updated and are based on the total mileage per day from all vehicles.

- iii. According to the District ATC application, the facility will operate/operates 24 hours per day, 7 days per week, 52 weeks per year. Therefore, it may be reasonable to assume employee trips and/or other vehicle trips could be generated by the facility 365 days per year. Please confirm that the operational days per year for the *CCA Employee Vehicles* and *Contractor Vehicles* are accurate at only 75 days per year and 12 days per year respectively. If so, please explain.

The facility operates 5 days a week at 260 days a year. Employee trips have been updated to reflect the 260 operational days and contractor vehicles at 104 days per year.

- iv. Ensure that for the “Proposed Project”, “2021”, and “2020” tabs, that emissions are based on the project information for the relevant year. Currently, it appears that data for 2019 is being utilized in the calculation for cell K10 and therefore the resultant emissions for “Proposed Project”, “2021”, and “2020” are based on 2019 activity data and not the specific data for the relevant year.

The emissions are based on the project information for the relevant year.

- e. [REDACTED] Address the following related to the [REDACTED]

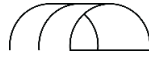
- i. Provide context and an explanation for the [REDACTED]

Since March 2021, makeup solvent has been tracked internally via a solvent tracking webform. This process is currently being developed and fine-tuned to reflect permitting requirements. In preparation for demonstration of compliance, this is being enforced internally and will be fully utilized upon issuance of a final permit. This is accomplished by logging the weight of the full container during “check-out”, logging the weight of the empty container during “check-in”, and reporting the difference as usage. Additionally, each container has a tare weight stamped that is used to determine the amount of solvent that remains in the tare when it is returned to our vendor. On average, 6% mass of [REDACTED] is returned to the vendor. This number is deducted from [REDACTED] purchased” to provide us with an accurate estimation of usage.

The “solvent used” in 2021 was calculated through the “Solvent Purchase\_Receipt History” spreadsheet and the procedure explained above.

The “solvent used” in 2021 and our internal record of how much biomass was processed in 2021, were used in tandem to create a ratio to estimate solvent use to biomass processed in 2021, applicable to 2020 and 2019.

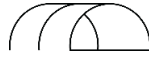
Finally, biomass records in 2020 and 2019 and the ratio were utilized to estimate the amount of solvent used in those years.



- ii. Provide supporting documentation for the [REDACTED] purchased as previously identified in comment 1.a. and 1.b.

See attachment "Solvent Purchase\_Receipt History". This summary includes the total amount of solvent that was vendor invoiced in 2021.

CCA's internal solvent tracking has been fine-tuned for concise reporting in accordance with permitting requirements. To avoid confusion with the "Solvent Purchase\_Receipt History" spreadsheet, our internal reporting is not included in this letter due to inconsistencies. The solvent internal tracking system was created mid-2021 and was down for periods of time. CCA has worked diligently over the past year to rectify the web form and provide adequate training to authorized employees utilizing solvents.



CCA acknowledges the District's request for historical documentation relating to solvents, utilities, vehicle emissions, etc. The district will find the available historical documentation gathered to the best of our ability based on modified tracking procedures. Where historical records are not available, CCA has provided an explanation of estimations and any relevant documentation.

Additionally, we understand from conversations with District staff that the District has requested this information to determine whether the project is subject to the California Environmental Quality Act ("CEQA"). CCA has been in communication with the District regarding CEQA applicability. CCA intends to continue these discussions with the District.

It is our hope that this response adequately addresses the questions raised by the District in your incompleteness letter and clearly communicates our proposed plans for permitted equipment and operations. If you have any questions, please do not hesitate to contact me at: [andriana@ccagriculture.com](mailto:andriana@ccagriculture.com) or (951) 310-4908.

Respectfully submitted,

Andriana Villalpando  
Environmental Compliance Manager

Attachments:

- Revised equipment list
- Manufacturer specs on the Parker 10 unit
- Solvents MSDS
- Solvent Purchase Receipt History
- Hazardous Waste Manifests
- Generator Logs
- SoCal Gas Bill Summary from 2020, 2021, and 2022
- Company car vehicle miles from 11/30/2021 - 06/07/2022 - \*Records do not predate this
- Chestnut/Laurel Utility Billing Statements
- Solvent Facility AQTR V1

Manufacturer Make and Model	Brief Equipment Description	Rating/Capacity	Number of Units	Touches Solvent (Y/N)
	Vacuum Sealer for lg flower bags	220-240 V at 50-60HZ	3	N
	Rolling machine	110V 15A	4	N
	Distillation	Flask Size dependent (1 Liter, 2 Liter, 5 Liter, 12 Liter, 22 Liter, 50 Liter - We	3	N
	Closed-loop hydrocarbon Extractor	42 gallons/hr	3	Y
	carbon scrubber	480V 4.3A 60HZ	2	Y
	Carbon scrubber	240LB of Carbon/ 30 Day Exchange	1	Y
	Solvent/Solute Holding Cauldron	200L	8	Y
	Fresh Frozen Material Columns	18lb x 6 columns	2	Y
	Solvent Holding Columns	32lb x 6 columns	2	Y
	Vacuum Oven	10 cubic feet	6	Y
	Bake Out Oven	28 Cubic Feet	3	N
	Freezer	115 VAC 1.5A 60Hz	1	N
	Crystal Production System	150L	3	Y
	Homogenizer	30 L (Viscosity Dependant)	1	N
	Oil Mist Filter	12 m3h-1	21	N
	Vacuum Pump	110V 50/60Hz 1-PH 8.2A	11	Y
	Fume Hood	0.54 HP	1	N
	3D printer	115V 5A	1	N
	Fume Hood	1.51 HP (electric)	1	Y
	Particle Size Separation	120V 10A 60 HZ, 1.5hp	1	Y
	Solvent Recovery System	5.28 gallons	2	Y
	Chiller	208 Vac/ 7.7 Kw	2	N
	Chiller	208V/ 60Hz	1	N
	moisture analysis	115V 10A 60 Hz	1	N
	Pump for pulling vacuum on vessels	3450 RPM/ 2 HP	2	Y
	Botritis and stem sort	240V 1Ph 20A	1	N
	grinder	220V 20A 60hz	1	N
	sizing sorting	120V 10A 60 HZ	1	N
	Grinder	115V 6A, .5hp	2	N
	Freezer	120v single phase/105 cu ft.	1	N
	Tunnel Dryer	1 Phase, 208-220 VAC, 30 Amp	1	N
	Freeze dryer 2 carts	480v 3 phase 80amp (controls and carts)	1	N
	Freeze dryer 2 condenser	480v 3 phase 60amp	1	N



Manufacturer Make and Model	Brief Equipment Description	Rating/Capacity	Number of Units	Touches Solvent (Y/N)
	Ultrasonic Washer	80 gallon washer 1 phase/ 208-220 VAC/ 30 Amp	2	N
	pouch sealing	110V 10A 60Hz	2	N
	Distillation	~1.0 gallon/hr	2	N
	Double Cone Blender	One (1) NEMA 4X, 5 HP VFD designed for 200-240 V, 3 Ph., 60 Hz input.	1	N
	Sifter for the ground flower	230/460V, 170W, .25 hp	1	N
	Fresh Frozen Material Storage	27 cubic ft / 766 liters	1	N
	Fresh Frozen Material Storage	31 cubic ft/ 877 liters	3	N
	Chiller	208V/ 60hz/ 8GMP @ 50psi	10	N
	Cartridge Filling Machine	550 carts/hr	6	N
	Mouthpiece Fastener	1755 mouthpieces/hr	5	N
	Trimmer for whole buds	2x 120V 20A circuits (1 for vacuum)	1	N
	Centrifuge	4000 lbs	1	Y
	Work in progress room	1.5hp	1	N
	Work in progress room	460/3/60 0.8amps	2	N
	Freezer for tray prep and FF storage	12hp	1	N
	Freezer for tray prep and FF storage	460/3/60/ 3.7amps	2	N
	Freezer for tray prep and FF storage	13340 watts	1	N
	15 HP air compressor	15 HP, 460/3/60, 15hp	1	N
	Liquid Accumulation Drum	60 gallons	1	Y
	Shell and Tube Heat Exchanger	10 ft^2 heat transfer area	1	Y
	Filter Fan	1.5 hp	1	Y
	Vacuum Pump	0.33 hp	2	N
	Mechanical Pump	3hp	10	N
	Air Compressor	15hp	1	N
	Vacuum Pump	20hp	2	N
	Vacuum Pump	10hp	2	N
	Air Compressor	4hp	1	N
	Filter	22L, 90 psi	2	Y
	Chiller	400 V 3,300 W / 208 – 220 V 3,600 W	1	N
	Cold Trap	115V/1ph/13AMPS (60Hz)	6	Y
	LN2 Holder	2 gal	1	Y
	Vacuum Pump	295 cfm, 20	1	Y
	Chiller	208 3~, 15.5 amps	1	N

Manufacturer Make and Model	Brief Equipment Description	Rating/Capacity	Number of Units	Touches Solvent (Y/N)
	Chiller	115. 350 watts	3	N
	Rotovap	220, 30 amps	2	Y
	Chiller	220, 2800 watts, 30 amps	4	Y
	Vacuum	110, 250 watts	2	N
	Vacuum Controller	110, 30 watts, 0.8 amps	2	N
	HEPA Vacuum	120, 1300 watts	1	N
	Cold Trap	115V/1ph/13AMPS (60Hz)	1	Y
	Crystal Production System	150-L	2	Y
	Column	Glass	4	Y
	Vessel	Glass	4	Y
	Vessel	HDPE	4	Y
	Reactor / Motor	115, 300 W	2	Y
	Chiller	460 3~, 16.5A	1	N
	Filter		2	Y
	Reactor / Motor	460 3~, 746W	2	Y
	Chiller	460 3~, 16A	1	N
	Chiller	460 3~, 16A	1	N
	Freeze Dryer	480V 3 phase 30A	1	N
	Freeze dryer 10 carts	480v 3 phase 60A, CCA to provide	1	N
	Freezer dryer 10 carts	480v 3 phase 90amp 75kVa Transformer	1	N
	Freezer dryer 10 carts	480v 3 phase 74amp	1	N
	Bud Sorting table	NA	1	N

	Annual Emissions Estimate (tons/year)	Average Daily Emissions Estimate (lbs/day)	Peak Daily Emissions Estimate (lbs/day)
<b>2019</b>			
NOx	0.57	3.11	14.95
ROC	9	50	51
CO	0.52	2.87	8.58
SOx	0.00	0.02	0.05
PM10	0.01	0.06	0.47
PM2.5	0.01	0.05	0.47
CO2	317	1737	6412
CH4	0.01	0.03	0.11
N2O	0.03	0.17	0.71
			MT/Year
GHG CO2e (CalEEMod Appendix D Table 1.2 PG&E)			297

	Annual Emissions Estimate (tons/year)	Average Daily Emissions Estimate (lbs/day)	Peak Daily Emissions Estimate (lbs/day)
<b>2020</b>			
NOx	0.44	2.41	12.10
ROC	135	740	741
CO	0.53	2.93	8.24
SOx	0.00	0.02	0.05
PM10	0.01	0.04	0.40
PM2.5	0.01	0.04	0.39
CO2	532	2916	7554
CH4	0.01	0.08	0.08
N2O	0.03	0.18	0.18
			MT/Year
GHG CO2e (CalEEMod Appendix D Table 1.2 PG&E)			494

	Annual Emissions Estimate (tons/year)	Average Daily Emissions Estimate (lbs/day)	Peak Daily Emissions Estimate (lbs/day)
<b>2021</b>			
NOx	0.35	1.94	10.77
ROC	119	651	652
CO	0.52	2.86	8.16
SOx	0.00	0.02	0.05
PM10	0.01	0.03	0.37
PM2.5	0.00	0.03	0.37
CO2	728	3988	8597
CH4	0.02	0.13	0.19
N2O	0.04	0.19	0.73
			MT/Year
GHG CO2e (CalEEMod Appendix D Table 1.2 PG&E)			672

	Average Daily Emissions Over Facility's History (lb/day)	Peak Daily Emissions Over Facility's History (lb/day)
<b>2019-2021</b>		
NOx	2.49	10.77
ROC	481	741
CO	2.89	8.16
SOx	0.02	0.05
PM10	0.04	0.37
PM2.5	0.04	0.37

	Annual Direct (MT/Year)	Annual Indirect (MT/Year)	Totals (MT/Year)
<b>Proposed Project GHG Emissions</b>			
CO2	288	618	906
CH4	0.0034	0.03	0.03
N2O	0.028	0.01	0.03
<b>Totals</b>	288	618	MT/Year
GHG CO2e (CalEEMod Appendix D Table 1.2 PG&E)			917

CCA Solvent Facility Proposed Project  
Mobile and Stationary Emissions - Daily and Annual

Equipment	Description	Size/ Quantity	Units	Hours/ Day	Hours/ Year	Max Vehicles/ Day	Daily Trip Miles	Day/year	Avg Distance (miles one way)	Daily Emissions (lb/day)									Annual Emissions (tons/year)										
										NOx	ROC	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	NOx	ROC	CO	SOx	PM10	PM2.5	CO2	CH4	N2O		
Solvent Extraction and Cleaning	Annual Solvent Use at Facility (24 hrs/day 5 days/week)																												
Chestnut Emergency Diesel Engine	Tier 3 Caterpillar C13 Standby Diesel Generator	539	HP		2	25																							
Laurel Emergency Diesel Engine	Tier 2 Caterpillar C15 Standby Diesel Generator	762	HP		2	25																							
Building Heater Natural Gas	Indoor sink for hot water	100	MMBTU/year																										
Forklift Diesel	Rental Unit	96	HP		1	6																							
CCA Employee Vehicles	Worker Commute and Onsite						50	1200	260	12	0.377	0.076	3.798	0.008	0.005	0.004	804	0.017	0.027	0.049	0.010	0.049	0.001	0.001	0.001	0.001	94.874	0.002	0.003
Contractor Vehicles	Deliveries/Contractors Heavy Truck						4	960	104	120	5.657	0.102	4.403	0.032	0.070	0.067	3354	0.005	0.528	0.294	0.005	0.021	0.002	0.004	0.003	174.430	0.000	0.027	
<b>TOTALS</b>											<b>29.22</b>	<b>111.87</b>	<b>19.99</b>	<b>0.07</b>	<b>1.05</b>	<b>1.05</b>	<b>7558</b>	<b>0.16</b>	<b>0.56</b>	<b>0.62</b>	<b>14.34</b>	<b>0.71</b>	<b>0.00</b>	<b>0.02</b>		<b>0.02</b>	<b>316.09</b>	<b>0.00</b>	<b>0.03</b>
																							GHG MT/yr		287.64	0.00	0.03		

Diesel Equipment Emission Factors

grams / b = 453.59

Equipment	Fuel Type	Emission Factors (g/bhp-hr)									
		NOx <sup>1</sup>	ROC <sup>2</sup>	CO <sup>2</sup>	SOx <sup>2</sup>	PM10 <sup>2</sup>	PM2.5 <sup>2</sup>	CO2 <sup>2</sup>	CH4 <sup>1</sup>	N2O <sup>1</sup>	
Tier 3 Generator Engine	Diesel	2.80E-00	2.00E-01	2.60E-03	5.00E-03	1.50E-01	1.50E-01	5.68E-02	1.80E-02	0.00E-00	
Tier 2 Generator Engine	Diesel	4.50E-00	3.00E-01	2.60E-03	5.00E-03	1.50E-01	1.50E-01	5.68E-02	1.80E-02	0.00E-00	
Forklift <sup>2</sup>	Diesel	6.60E-00	7.68E-01	4.08E-03	5.00E-03	5.55E-01	5.55E-01	5.11E-02	1.53E-01	0.00E-00	

1. CalEEMod Appendix D Table 3.4 OFFROAD Equipment Emission Factors 2019 Generator 2015 Forklift  
2. USEPA Emission Standards for Tier 1-4 Engines

Heater Emission Factors

grams / b = 453.59

Equipment	Fuel Type	Emission Factors (lb/MMBTU) <sup>1</sup>								
		NOx	ROC	CO	SOx	PM10	PM2.5	CO2	CH4	N2O
Water Heater	PUC natural gas	6.70E-02	5.40E-03	3.93E-02	1.37E-02	7.50E-03	7.50E-03	1.14E-02	2.20E-03	0.00E-00

1. Santa Barbara APCD Boiler and Steam Generator Emission Calculations Version 7.0

Indirect GHG Emissions - PG&E Electricity Service

Yearly Electricity Consumption (kWh)			GHG Emission Factors (lb/MWh)			Electric Yearly Emissions (MT/year)		
2118914	1.5 times 2021 Usage		CO2	CH4	N2O	CO2	CH4	N2O
Emission Factor Source								
CalEEMod Appendix D Table 1.2 PG&E		641	0.029	0.00617	617.99	0.03	0.01	0.01
PG&E Document CPUC Approved		524	0.029	0.00617	505.19	0.03	0.01	0.01
PG&E Website Independently Verified		206	0.029	0.00617	198.61	0.03	0.01	0.01

Total GHG Emissions - Vehicles Electricity

Electricity Emission Factor Source	Total Yearly Emissions (MT/year)		
	CO2	CH4	N2O
CalEEMod Appendix D Table 1.2 PG&E	905.64	0.03	0.03
PG&E Document CPUC Approved	792.84	0.03	0.03
PG&E Website Independently Verified	486.25	0.03	0.03

Electricity Emission Factor Source	Daily Emissions (lb/day)		
	CO2	CH4	N2O
CalEEMod Appendix D Table 1.2 PG&E	4962.39	0.17	0.19

CCA Solvent Facility 2021  
 Mobile and Stationary Emissions - Daily and Annual

Equipment	Description	Size/ Quantity	Units	Hours/ Day	Hours/ Year	Max Vehicles/Day	Daily Trip Miles/Vehicle	Day/year	Avg Distance (miles one way)	Daily Emissions (lb/day)								Annual Emissions (tons/year)																					
										NOx	ROc	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	NOx	ROc	CO	SOx	PM10	PM2.5	CO2	CH4	N2O												
Solvent Extraction and Cleaning	Annual Solvent Use at Facility																																						
Chestnut Emergency Diesel Engine	Tier 3 Caterpillar C13 Standby Diesel Generator	539	HP		1	2																																	
Building Heater Natural Gas	Indoor sink for hot water	82.5	MMBTU/year																																				
Forklift Diesel Rental		96	HP		1	6																																	
CCA Employee Vehicles	Worker Commute and Onsite						50	1200	250	12	0.377	0.076	3.798	0.008	0.005	0.004	804	0.017	0.027	0.049	0.010	0.494	0.001	0.001	0.001	0.001	94.874	0.002	0.002	0.003									
Contractor Vehicles	Deliveries/Contractors Heavy Truck						4	960	104	120	5.657	0.102	0.403	0.032	0.070	0.067	3354	0.005	0.528	0.294	0.005	0.021	0.002	0.004	0.003	174.430	0.000	0.007											
<b>TOTALS</b>							<b>54</b>	<b>2160</b>	<b>364</b>	<b>132</b>	<b>10.77</b>	<b>651.66</b>	<b>8.16</b>	<b>0.05</b>	<b>0.37</b>	<b>0.37</b>	<b>4968</b>	<b>0.08</b>	<b>0.56</b>	<b>0.35</b>	<b>118.84</b>	<b>0.52</b>	<b>0.00</b>	<b>0.01</b>	<b>0.00</b>	<b>275.02</b>	<b>0.00</b>	<b>0.03</b>											
										312000.000																													
										grams/lb = 453.59																													
										Emission Factors (g/bhp-hr) <sup>1</sup>																													
Equipment	Fuel Type	NOx	ROc	CO	SOx	PM10	PM2.5	CO2	CH4	N2O																													
Tier 3 Generator Engine	Diesel	2.80E-00	2.00E-01	2.60E-00	5.00E-03	1.50E-01	1.50E-01	5.68E-02	1.80E-02	0.00E-00																													
Forklift	Diesel	6.60E-00	7.8E-01	4.06E-00	5.00E-03	5.55E-01	5.55E-01	5.1E-02	1.53E-01	0.00E-00																													

- 1. Cal EEMod Appendix D Table 3.4 OFFROAD Equipment Emission Factors 2019 Generator 2015 Forklift
- 2. USEPA Emission Standards for Tier 1-4 Engines

grams/lb = 453.59

Equipment	Fuel Type	Emission Factors (lb/MMBTU) <sup>1</sup>									
		NOx	ROc	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	
Water Heater	PUC natural gas	6.70E-02	5.40E-03	3.93E-02	1.37E-02	7.50E-03	7.50E-03	1.14E-02	2.20E-03	0.00E-00	

2. Santa Barbara APCD Boiler and Steam Generator Emission Calculations Version 7.0

Indirect GHG Emissions - PG&E Electricity Service

Yearly Electricity Consumption (kWh)	From City of Lompoc Utility @ lbs	GHG Emission Factors (lb/MWh)			Electric Yearly Emissions (MT/year)		
		CO2	CH4	N2O	CO2	CH4	N2O
1412609							
	Emission Factor Source						
	CalEEMod Appendix D Table 1.2 PG&E	641	0.029	0.00617	411.99	0.02	0.00
	PG&E Document CPUC Approved	524	0.029	0.00617	367.9	0.02	0.00
	PG&E Website Independently Verified	206	0.029	0.00617	132.40	0.02	0.00

Total GHG Emissions - Vehicles Electricity

		Total Yearly Emissions (MT/year)		
		CO2	CH4	N2O
Electricity Emission Factor Source				
CalEEMod Appendix D Table 1.2 PG&E	862.26	0.02	0.03	
PG&E Document CPUC Approved	587.06	0.02	0.03	
PG&E Website Independently Verified	382.67	0.02	0.03	

		Daily Emissions (lb/day)		
		CO2	CH4	N2O
Electricity Emission Factor Source				
CalEEMod Appendix D Table 1.2 PG&E	3628.82	0.11	0.17	

CCA Solvent Facility 2020

Mobile and Stationary Emissions - Daily and Annual

Equipment	Description	Size/ Quantity	Units	Hours/ Day	Hours/ Year	Max Vehicles/ Day	Daily Trip Miles/Vehicle	Day/year	Avg D stance (miles one way)	Daily Emissions (lb/day)							Annual Emissions (tons/year)										
										NOx	ROC	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	NOx	ROC	CO	SOx	PM 0	PM2.5	CO2	CH4	N2O
Solvent Extraction and Cleaning	Annual Solvent Use at Facility																										
Chestnut Emergency Diesel Engine	Tier 3 Caterpillar C13 Standby Diesel Generator	539	HP	1	13					3.327	0.000	3.090	0.006	0.178	0.178	675	0.021	0.000	2.16E-02	1.54E-03	2.01E-02	3.86E-05	1.16E-03	1.16E-03	4.39E 00	1.39E-04	0.00E 00
Building Heater Natural Gas	Indoor sink for hot water	43.4	MMBTU/year							0.008	0.001	0.005	0.002	0.001	0.001	13.590	0.000	0.000	1.45E-03	1.17E-04	8.53E-04	2.97E-04	1.63E-04	1.63E-04	2.48E 00	4.77E-05	0.00E 00
Forklift Diesel Rental		96	HP	1	6					1.397	0.163	0.860	0.001	0.117	0.117	108	0.632	0.000	4.19E-03	4.88E-04	2.58E-03	3.17E-06	3.52E-04	3.52E-04	3.24E-01	9.71E-05	0.00E 00
CCA Employee Vehicles	Worker Commute and Onsite					45	1080	260	12	0.375	0.077	3.700	0.007	0.004	0.004	733	0.017	0.026	0.040	0.010	0.481	0.001	0.001	0.001	86.405	0.002	0.003
Contractor Vehicles	Deliveries/Contractors Heavy Truck					4	960	04	120	6.992	0.154	0.581	0.032	0.096	0.092	3371	0.007	0.531	0.364	0.008	0.030	0.002	0.005	0.005	175.278	0.000	0.028
<b>TOTALS</b>						<b>49</b>	<b>2040</b>	<b>364</b>	<b>132</b>	<b>12.10</b>	<b>740.62</b>	<b>8.24</b>	<b>0.05</b>	<b>0.40</b>	<b>0.39</b>	<b>4900</b>	<b>0.08</b>	<b>0.56</b>	<b>0.44</b>	<b>135.11</b>	<b>0.53</b>	<b>0.00</b>	<b>0.01</b>	<b>0.01</b>	<b>268.88</b>	<b>0.00</b>	<b>0.03</b>
										<b>GHG MT/yr 244.68 0.00 0.03</b>																	

Diesel Equipment Emission Factors

grams/lb = 453.59

Equipment	Fuel Type	Emission Factors (g/bhp-hr) <sup>1</sup>																		
		NOx <sup>1</sup>	ROC <sup>1</sup>	CO <sup>1</sup>	SOx <sup>1</sup>	PM10 <sup>1</sup>	PM2.5 <sup>1</sup>	CO2 <sup>1</sup>	CH4 <sup>1</sup>	N2O <sup>1</sup>	NOx <sup>2</sup>	ROC <sup>2</sup>	CO <sup>2</sup>	SOx <sup>2</sup>	PM10 <sup>2</sup>	PM2.5 <sup>2</sup>	CO2 <sup>2</sup>	CH4 <sup>2</sup>	N2O <sup>2</sup>	
Tier 3 Generator Engine	Diesel	2.80E-00	2.00E-01	2.60E-00	5.00E-03	1.50E-01	1.50E-01	5.68E-02	1.80E-02	0.00E-00										
Forklift <sup>1</sup>	Diesel	6.60E-00	7.68E-01	4.06E-00	5.00E-03	5.55E-01	5.55E-01	5.11E-02	1.53E-01	0.00E-00										

1. CalEEMod Appendix D Table 3.4 OFFROAD Equipment Emission Factors 2019 Generator 2015 Forklift

2. USEPA Emission Standards for Tier 1-4 Engines

Heater Emission Factors

grams/lb = 453.59

Equipment	Fuel Type	Emission Factors (lb/MMBTU) <sup>1</sup>									
		NOx	ROC	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	
Water Heater	PUC natural gas	6.70E-02	5.40E-03	3.93E-02	1.37E-02	7.50E-03	7.50E-03	1.14E 02	2.20E-03	0.00E 00	

2. Santa Barbara APCD Boiler and Steam Generator Emission Calculations Version 7.0

Indirect GHG Emissions - PG&E Electricity Service

Yearly Electricity Consumption (kWh)

521744	From City of Lompoc Utility 8 lbs Emission Factor Source	GHG Emission Factors (lb/MWh)			Electric Yearly Emissions (MT/year)		
		CO2	CH4	N2O	CO2	CH4	N2O
	CalEEMod Appendix D Table 1.2 PG&E	641	0.029	0.00617	239.67	0.01	0.00
	PG&E Document CPUC Approved	524	0.029	0.00617	195.92	0.01	0.00
	PG&E Website Independently Verified	206	0.029	0.00617	77.02	0.01	0.00

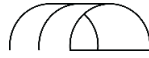
Total GHG Emissions - Vehicles Electricity

Electricity Emission Factor Source	Total Yearly Emissions (MT/year)		
	CO2	CH4	N2O
CalEEMod Appendix D Table 1.2 PG&E	484.34	0.01	0.03
PG&E Document CPUC Approved	440.60	0.01	0.03
PG&E Website Independently Verified	321.70	0.01	0.03

Electricity Emission Factor Source	Daily Emissions (lb/day)		
	CO2	CH4	N2O
CalEEMod Appendix D Table 1.2 PG&E	2653.94	0.07	0.17





CENTRAL COAST AGRICULTURE, INC.

85 W HWY 246 #233, Buellton, CA 93427

July 27, 2022

Kevin Brown  
Air Quality Engineer III  
Santa Barbara County Air Pollution Control District  
260 N San Antonio Rd Ste. A  
Santa Barbara, CA 93110

**Re: Response to Incomplete Authority to Construct Application 15634**

Dear Kevin Brown:

In response to our meeting on July 25th, 2022, CCA is providing clarification on item 2 of the response to the incompleteness letter dated July 13, 2022. The following descriptions are in regards to other feasible control technology for solvent removal in spent biomass:

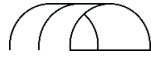
1. [REDACTED]
2. [REDACTED]

If you have any questions, please do not hesitate to contact me at: [andriana@ccagriculture.com](mailto:andriana@ccagriculture.com) or (951) 310-4908.

Respectfully submitted,

Andriana Villalpando  
Environmental Compliance Manager





CENTRAL COAST AGRICULTURE, INC.

Attachments:

→

■

■



August 12,

Andriana Villalpando  
Central Coast Agriculture  
85 W. Highway 246, #233  
Buellton, CA 93427

FID: 11664  
Permit: A 15634  
SSID: 11415

Re: Authority to Construct Application 15634

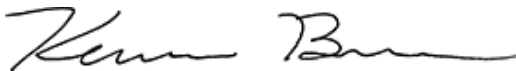
Dear Andriana Villalpando:

On August 12, 2022, the Santa Barbara County Air Pollution Control District (District) determined that your application for Authority to Construct (ATC) No. 15634 for a cannabis processing facility at 1201 W. Chestnut Avenue in Lompoc was complete. The District will make a decision to either issue or deny a permit for the application within 180 days from the completeness date or 180 days after lead agency approval of the project, whichever time period is longer.

Please be advised that proceeding with the construction of your project without an ATC permit violates District Rule 201 and may result in penalties.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 979-8313.

Sincerely,



Kevin Brown, Air Quality Engineer III  
Engineering Division

cc: Central Coast Agriculture - 1201 W Chestnut Ave. 11664 Project File  
Engr Chron File  
Lindsay Cokeley  
Carly Barham

\\sbapcd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture - Chestnut Ave\ATCs\ATC 15634\ATC 15634 - ATC Completeness - 8-12-2022

September 23, 2022

Central Coast Agriculture, LLC  
Attn: Andriana Villalpando  
85 W. Highway 246, #233  
Buellton, CA 93427

Electronic [andriana@ccagriculture.com](mailto:andriana@ccagriculture.com)

**Re:** Authority to Construct Application 15634 – CEQA Review Requirements

Dear Ms. Villalpando:

As you are aware, on August 12, 2022, the Santa Barbara County Air Pollution Control District (District) deemed your application for a cannabis processing facility at 1201 W. Chestnut Avenue and 1200 W. Laurel Avenue in the City of Lompoc complete. Your project is subject to environmental review under the California Environmental Quality Act (CEQA) and the *Environmental Review Guidelines for the Santa Barbara County Air Pollution Control District*. Pursuant to the requirements of CEQA Guidelines Section 15064, the District anticipates that a Mitigated Negative Declaration (MND) is required. Our review is based on the attached project description as well as materials submitted with your application. During the MND development process, we will work with you to refine and clarify the project description. Please review this description carefully. If you believe the project description is incorrect or does not include components that you intend to include as part of the project, please contact us immediately. We reserve the right to request additional information to complete our environmental evaluation of the project.

#### Advisories

Based on our initial review of your application, we offer the following advisory statements:

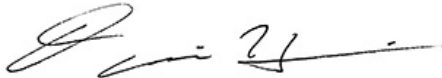
1. **Environmental Document Fees Advisory.** At this time, the District anticipates that a Mitigated Negative Declaration will be required, and an outside consultant will be contracted to prepare the MND. Consistent with District Rule 210, Section I.C.a.2.c., the District will work with you to select an outside consultant to prepare the document. The applicant will be responsible for paying all consultant and staff costs associated with the MND preparation. The applicant has a cost reimbursement account established with the District as well as a fee deposit. If, at any time during the District's work, the District determines that additional funds are necessary to cover reimbursable costs for the next ninety (90) days, an additional deposit may be required.

Additionally, effective January 1, 2007, all environmental documents prepared must be sent to the Department of Fish and Wildlife for review and comment. The Department of Fish and Wildlife charges a filing fee pursuant to section 711.4 of the California Fish and Game Code. These fees shall be paid at the end of the environmental review process prior to filing the Notice of Determination. Furthermore, pursuant to Section 711.4(c)(3) of the Fish and Game Code, “no project shall be operative, vested or final, nor shall local governmental permits for the project be valid until the filing fees required pursuant to this section are paid.”

2. **Consultation.** Please be advised that feedback from applicable resource agencies may be utilized in helping to determine the scope and content of our environmental review and that the District may request additional information from the project applicant in the event a Responsible or Trustee Agency requests additional information.
3. **Tribal Cultural Resources under the California Environmental Quality Act, AB52 (Gatto, 2014).** Pursuant to Public Resources Code (PRC) § 21080.3.1, the District has sent out a formal notification of application completeness to interested Native American tribes. Native American Tribes are given the opportunity to consult on the environmental document at their discretion.

Please be aware that substantial revisions to submitted information may affect the time, cost, and level of review for your project. If you have any questions regarding these comments, please feel free to contact me at [HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org) or (805) 979-8311. Thank you for your cooperation.

Sincerely,



David Harris, Manager  
District Engineering Division

Enc. Project Description

cc: Central Coast Agriculture - Chestnut Ave. 11664 Project File  
Engr Chron File  
Planning Chron File  
Alex Economou, Manager, District Planning Division (email only)  
Carly Barham, District Planning Division (email only)  
William Sarraf, Supervisor, District Engineering Division (email only)