

ATC 15634 – Central Coast Agriculture Cannabis Manufacturing and Distribution Facility

Project Description – September 23, 2022

Central Coast Agriculture (Central Coast Ag Products, CCA Products LLC and CCA Distribution LLC) has applied for an Authority to Construct permit for an existing cannabis manufacturing and distribution facility at 1201 W. Chestnut Avenue and 1200 W. Laurel Avenue in the City of Lompoc. 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. The project site is identified as Assessor Parcel Numbers (APNs) 091-040-061 and 091-040-026.

The facility produces various products from raw cannabis plant material. These products include live resin, live sauce, diamonds, vape cartridges, whole flower, and pre-rolls. Proposed operations at the facility will consist of volatile extraction, non-volatile extraction, post-extraction refinement, processing (drying, trimming, sorting, etc.), storage, packing, labeling and distribution. Specifically, the facility uses both volatile and non-volatile extraction methods to convert biomass into concentrated oil products. The facility currently has three (3) volatile extraction systems. [REDACTED]

[REDACTED] The products are then packaged for off-site shipment. The facility will operate 24 hours per day, 5 days per week, 52 weeks per year.

Specialized equipment will be used at the facility. Equipment specifications are deemed confidential by the applicant. A redacted equipment list is attached. The volatile extraction process is confidential. The solvents used in a volatile extraction machine are confidential. Solvent usage amounts are confidential. The make and model of volatile and non-volatile extraction equipment and machines are confidential. The post extraction refinement process is confidential.

Odors generated from the process will be controlled by a carbon absorption system installed throughout the facility. Odor control devices include rechargeable carbon canisters using activated carbon with a sorbent weight per unit of 240 lbs and exhaust fan with a capacity of 3,500 scfm. In addition, four (4) replaceable carbon cannister units using activated carbon with a sorbent weight per unit of 12 lbs and one exhaust fan with a capacity of 740 scfm will be used.

Solvent emissions will be controlled with various technologies including closed-loop volatile extraction booths and two-stage cold traps. The potential solvent emissions [REDACTED]

[REDACTED] The cold trap solvent recovery technology collects and liquefies solvent vapors (ROCs) for reinjection into the extraction process or other recycling measures. The cold trap is estimated to achieve 99% recovery of solvent. There are some process areas where the solvent vapors will not be recovered through the cold trap, so although the cold trap efficiency is estimated at 99%, the overall facility solvent recovery efficiency could be slightly lower. The combined extraction equipment and cold trap recovery [REDACTED] is estimated to recover 96% of the total extraction solvent used daily in the facility.

The proposed operations will result in employee/worker vehicle trips (approximately 50 vehicles per day). Various contractor and delivery trips will also occur (approximately 4 vehicles per day). The facility

is served by PUC natural gas for heating and PG&E provides electricity. Solvent-contaminated debris 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 licensed hazardous waste hauler. Hazardous waste is collected, logged, labeled, and stored before being picked up by licensed hauler for disposal. The facility also currently includes an existing 539 HP Tier 3 diesel emergency stand-by generator engine at 1201 W. Chesnut Avenue and a 762 HP Tier 2 diesel generator engine for emergency back-up power supply at 1200 W. Laurel Avenue.

With the installation of the proposed controls, the proposed hydrocarbon extraction processes will result in 100.52 lb/day 13.09 tons/yr of ROC emissions. The facility will use [REDACTED] for general solvent cleaning resulting in an addition 10.05 lb/day 1.31 ton/year of ROC emissions. Total ROC emissions related to solvent usage are estimated at 110.57 lb/day and 14.40 ton/year. Additional criteria pollutant and greenhouse gas emissions will occur from operation of the diesel generator engines, area sources, mobile equipment, and motor vehicles. Indirect emissions will occur from electricity usage, water usage and waste disposal.

| 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 Fasterner | 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 |

October 21, 2022

Via Email and US Mail

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

Electronic andriana@ccagriculture.com

Re: Authority to Construct Application 15634 – Notification of Contractor Support

Dear Ms. Villalpando:

As you are aware, your project is subject to environmental review under the California Environmental Quality Act (CEQA) and the District anticipates that a Mitigated Negative Declaration (MND) is required. Due to the scope of review required, including analysis of impacts outside the District's direct expertise, and as allowed in District Rule 210, the District will retain the services of an environmental consultant to assist with the preparation of the Initial Study/MND. Pursuant to Rule 210.C.a.2.c.i, we are: a) notifying you of our intention to hire a consultant to address the above-described workload; b) providing you with the proposed scope of work; and c) identifying MRS Environmental, Inc. as the proposed consultant. As provided in Rule 210, you may comment on the scope of work and may propose up to three additional consultants. **Please submit your comments no later than November 2, 2022.** We will assume you have no comments if we do not hear from you by that date.

CEQA review will continue to be conducted on a reimbursable basis pursuant to District Rule 210 - Fees. We have already received the reimbursable deposit from you for this work and you will continue to receive a monthly invoice for the District's actual work efforts.

If you have any questions regarding this letter, please contact me at HarrisD@sbcapcd.org or (805) 979-8311.

Sincerely,



David Harris, Manager
Engineering Division

Attachment: MRS Environmental, Inc. Proposal/Scope of Work

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

Aeron Arlin Genet, Air Pollution Control Officer



September 23, 2022

Carly Barham
Planning Division
Air Pollution Control District
Santa Barbara County
BarhamC@sbcapcd.org
805.979.8337

Re: Proposal to Prepare an Initial Study-Mitigated Negative Declaration (IS-MND) for the Central Coast Agriculture Cannabis Manufacturing and Distribution Facility

Dear Ms. Barham:

MRS Environmental, Inc. is pleased to submit this proposal to assist the Air Pollution Control District in preparing an IS-MND for a proposed expansion of the Central Coast Agriculture Cannabis Manufacturing and Distribution Facility. The Proposed Project consists of the permitting of an existing large-scale cannabis manufacturing, processing, and distribution facility within the City of Lompoc. The facility requests a permit for the expansion of existing operations and the installation of specialized equipment.

The District is the lead agency under the California Environmental Quality Act (CEQA) for this project. Preliminarily, the District has identified that a Mitigated Negative Declaration is required. Due to the nature of facility and operations, the District expects that detailed analysis of the impacts to Air Quality, Greenhouse Gas Emissions, Energy, Hazards and Hazardous Materials, Transportation, Hydrology/Water Quality, and Utilities/Service Systems will be required. Previous analysis conducted for the facility, such as previous CEQA studies related to the existing facility, will also be utilized.

This proposal addresses includes a brief summary of experience conducting environmental analysis for industrial projects in Santa Barbara County, including experience with cannabis projects; a proposed cost summary and our availability to conduct necessary work within the next five months or less.

A. MRS Environmental Qualifications and Experience

MRS specializes in providing expert health, safety, and risk assessment services to agencies on the permitting, design, operation, and compliance issues of industrial facilities. MRS staff have extensive experience in the application of air quality modeling; health risk assessments utilizing the most recent OEHHA HARP2 model; customized use of the AERMOD modeling for specific localized impacts and mortality/morbidity assessments; use of the CANARY hazard model for assessing potential hazardous material accident scenarios and risk. MRS has completed application of these capabilities

on numerous projects including the cannabis industry, transportation and industrial facilities, the petroleum industry including offshore oil and gas development, oil and gas processing, refinery operations, oil and gas pipelines and remediation. The major types of services that MRS provides include the following: environmental documentation (EIR/EIS), air quality and health risk assessments, process safety assessments, quantitative risk assessments (QRAs) and process safety management audits.

MRS Environmental expertise in cannabis includes the development of an air quality modeling assessment and associated Odor Abatement Plan in compliance with land use and development code (LUDC section 35.42.075.C.6) for the Phoenix project in northern Santa Barbara County. The project involved estimating potential emissions of Terpenes at different stages of the facility operations, including Myrcene, Limonene, α -Pinene and β -Pinene, the primary contributors to odors. AERMOD modeling was conducted to estimate the extent of potential odor threshold exceedances and to provide input to the abatement plan. The abatement plan was developed addressing a range of potential measures, including activated carbon and vapor-phase odor control.

B. Scope of Work

MRS Environmental will be responsible for assisting the District with:

1. Data collection, technical review, and baseline conditions analysis,
2. Preparation of the Initial Study/Mitigated Negative Declaration,
3. Preparation of environmental notices and filings,
4. Other tasks as required to fulfill the District's obligations under CEQA.

The remainder of this proposal provides the scope of work for each of the task associated with preparation of the IS-MND, an estimated schedule, and the associated costs.

B.1. Data collection, Technical review, and Baseline Conditions Analysis

MRS Environmental, Inc. will assist the District in the collection and review of data, including developing information requests as needed to identify the issues that could potentially produce significant impacts in need of mitigation. Any technical analysis conducted by the Applicant will be peer reviewed to ensure accuracy and technical thoroughness.

An important aspect of the analysis will be the determination of the baseline. Generally, a baseline is defined as the period of time when the NOP is issued, but some projects may utilize different baselines depending on the history of operations. MRS Environmental will work closely with the



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District on the determination of baseline and MRS Environmental has extensive experience utilizing CEQA principals in the selection of a defensible baseline analysis.

Development of baseline conditions for the different issue areas will also involve data development and review, particularly those related to air quality and odors associated with the existing facilities and the experiences of nearby receptors. An exacerbation of an existing situation that currently is producing potential impacts to areas could be considered a significant impact and would need to be mitigated.

B.2. Preparation of the Initial Study/Mitigated Negative Declaration

The environmental analysis for the IS-MND will use the CEQA initial study checklist questions for assessing the various environmental impacts. This checklist will be taken from the Association of Environmental Professionals (AEP) 2022 CEQA Statutes and Guidelines Manual.

The environmental analysis will provide a detailed discussion of the level of impact for each initial study checklist item that would apply to the proposed Project. In some cases, the checklist items would not apply to the proposed Project. In these cases, the reason for an item not being applicable to the proposed Project will be discussed. Based upon the environmental analysis each checklist item will be classified as follows:

- Potentially Significant Impact,
- Less Than Significant Impact With Mitigation Incorporated,
- Less Than Significant Impact, or
- No Impact.

Mitigation measures will be developed for all the checklist items that are found to be less than significant with mitigation incorporated. It is expected that most of the impacts that will require mitigation will be associated with operational air impacts, particularly odors, as well as some potential impacts associated with construction. The key issue areas in the IS-MND will be a detailed analysis of the impacts to Air Quality, Greenhouse Gas Emissions, Energy, Hazards and Hazardous Materials, Transportation, Hydrology/Water Quality, and Utilities/Service Systems.

An MS Word copy of the Administrative Draft IS-MND will be provided to the District and comments and edits will be provided in the MS Word document. Any of the technical appendices that are not created in MS Word or were prepared by the Applicant will be proved as pdf files.



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MRS Environmental, Inc. will update the IS-MND based upon the Districts comments on the Administrative Draft IS-MND and provide the District with a Final Public Draft IS-MND that can be issued for the required 30-day comment period. MRS Environmental, Inc. will provide up to 10 hard copies of the main volume of the Public Draft IS-MND. The hard copies will contain a CD that has all the technical appendices in pdf format. The District will be provided with a pdf version of the Public Draft IS-MND that can be placed on their website.

MRS Environmental, Inc. will be responsible for developing written responses to the comments received on the Public Draft IS-MND. As needed, the IS-MND document will be updated to address the comments received. MRS Environmental, Inc. will submit to the District an Administrative Final IS-MND for review and comment. It has been assumed that a MS Word copy of the Administrative Final IS-MND will be provided to the District and that comment and edits will be provide in the MS Word document.

MRS Environmental, Inc. has included time for attendance at one Planning Commission hearing. Time has also been included to review staff report material.

Issue area approach methodology are discussed below.

Air Quality, Greenhouse Gas Emissions

Air quality is a critical issue related to cannabis developments particularly related to odors. Modeling, in coordination with the District, will be utilized as needed identify potential issues related to terpene emissions from cannabis operations during different phases of the facility operations. This approach provides for detailed disclosure of potential impacts associated the facility. As the proposed facilities are located in urban areas in downtown Lompoc, impacts to nearby residents and commercial areas are anticipated. The project proposes the use of carbon absorption system installed throughout the facility. Odor control devices include rechargeable carbon canisters using activated carbon with a sorbent weight per unit of 240 lbs and exhaust fan with a capacity of 3,500 scfm. In addition, four (4) replaceable carbon cannister units using activated carbon with a sorbent weight per unit of 12 lbs and one exhaust fan with a capacity of 740 scfm will be used. The effectiveness of these systems will be evaluated based on manufacturers information on removal efficiencies, resulting emissions to ambient and potential downwind impacts based on concentrations and by reviewing other similar system carbon system installations monitoring data and performance measures.

In addition, criteria and GHG emissions will be estimated, utilizing a standard approach such as CalEEMod most recent version web-based tool if applicable or spreadsheets specific to the facility operations (there does not appear to be any construction-related emissions, such as grading etc). The Applicant appears to have estimated emissions from operations, and these will be peer reviewed to ensure accuracy. The existing facility operations, including odor complaint history and estimated



historical odor material emissions, will also be developed as part of the baseline analysis. Additional mitigation measures, such as increased carbon filtration systems or multiple systems or modified flow rates, will be proposed and coordinated with the District to ensure any measures are effective.

Health risk is also a potential concern that will be addressed. Emissions screening or a more detailed HARP2 analysis may need to be performed in coordination with the District. Operational emissions as summarized by the operator exceeded 100 pounds per day and, depending on ROC pollutant weight fractions, may produce offsite impacts. A screening approach is proposed for this analysis. A more detailed HARP2 analysis may require additional scoping.

Energy

The CEQA Guidelines address energy impacts in two areas, and each of these will be addressed for the proposed project. These include Guidelines Appendix F, related to energy conservation, and Appendix G checklist, section related to energy use and potential wasteful energy use and compliance with state or local plans for renewable energy and energy efficiency. The existing facility operations energy use will also be examined as part of the baseline analysis.

Hazards and Hazardous Materials

Hazardous materials can be used in a number of different processes, from the storage of propane or use of natural gas as a fuel, the use of pesticides or other hazardous products, or the storage of flammable materials or products, such as solvents or oils, and the potential impacts of accidents involving these materials. Spills of materials can affect nearby residences in an immediate manner or as contamination of area water sources or have environmental impacts. Coordination with the fire department, along with the District, will also be performed to ensure effective measures are in place. The CEQA Guidelines address hazardous material use for both normal and upset conditions as well as proximity to schools and sensitive receptors or environments. These will be evaluated both for the project as well as the baseline to determine the potential incremental changes in hazardous materials use impacts.

Transportation

Transportation of construction materials and equipment as well as operational transportation of supplies and product could affect area roadways and traffic levels. Generally, CEQA only addresses the potential impacts of increased vehicle miles traveled, which is applicable to only employees and automobile traffic. However, if additional analysis related to City policies on traffic level of service is needed, MRS Environmental will utilize subcontractors to perform detailed traffic modeling if needed. Simple traffic modeling will be conducted by MRS Environmental if needed and is included in this proposal. If detailed traffic modeling is needed, it can be added as an additional scope item.



Baseline activities and traffic levels will also be assessed to determine the potential incremental impacts of the project traffic.

Hydrology/Water Quality

Hydrology and water quality assessment will utilize the criteria defined by the CEQA Guidelines, including water quality and waste discharge requirements, impacts on groundwater supplies and basin groundwater management, and drainage, flooding etc. potential impacts of the project. Activities associated with the baseline will also be assessed to determine the potential incremental changes of the project.

Utilities/Service Systems

Utility use by the project will include examination of potential impacts on electrical use in the utility service area as well as potential impacts to services provided by the City and/or the applicable utility company, including fire protection. Other utility issues include those listed in the CEQA Guidelines, such as water and wastewater treatment, water supplies, solid waste and regulations related to solid waste. Activities associated with the baseline will also be assessed to determine the potential incremental changes of the project.

Other Issue Areas

Other issues areas may be addressed that could produce impacts, including noise related to construction or operations, if any nighttime activities are present (the project proposes 24 hr/day operations) that could generate noise or lighting issues, proximity to high fire hazard areas for fire issues, presence and applicability of firefighting capabilities, ground disturbance related to potential cultural issues, or biological impact issues. None of these are considered to present potentially significant impacts, if they are even applicable (such as biological resources) but MRS Environmental has expertise in all of these areas and will utilize this expertise to ensure that potential impacts will not result from the project or if additional mitigation measures may need to be required.

B.3. Preparation of environmental notices and filings

MRS will ensure that all CEQA-related filing, such as NOI and NOD, are prepared and submitted as required by CEQA. MRS has extensive experience in assisting jurisdictions with satisfying CEQA submission requirements for a large number of large and small projects.



B.4. Other tasks as required to fulfill the District’s obligations under CEQA

Other tasks that may be needed, such as hearings or coordination with local concerns, will also be provided by MRS. MRS has extensive experience in providing CEQA compliance, including public workshops and hearings, for a large range of projects.

C. Schedule

The estimated schedule for the development of the IS-MND is provided below.

| Deliverable to the District | Duration (weeks) | Comment |
|-----------------------------|------------------|---|
| Draft Project Description | 2 | From Notice to Proceed. |
| Final Project Description | 1 | From Receiving Comment back from District and Applicant on Draft Project Description. |
| Administrative Draft IS-MND | 6-8 | From Notice to Proceed. |
| Public Draft IS-MND | 2 | From Receiving Comment back from District on Administrative Draft IS-MND. |
| Administrative Final IS-MND | 3-4 | From Receiving All Comments on the Public Draft IS-MND from the District. |
| Final IS-MND | 2 | From Receiving Comment back from District on Administrative Final IS-MND. |

C. Costing

To complete the scope of work discussed above, MRS Environmental, Inc is requesting a time and materials budget with a not to exceed price of \$42,625 without prior authorization. The table below provides a breakdown of these costs by task. MRS provides cost estimates that are conservative and generally MRS does not solicit change-orders unless major project changes are required. CEQA process can require a range of efforts and this costing is considered conservative, covering a range of potential requirements associated with a project.



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| Key Staff | Rate (\$/hr) | Project Description | | Environmental Analysis | | Public Draft IS-MND | | Response to Comments and Final IS-MND | | Hearing Support | | Total | |
|---------------------------------|--------------|---------------------|----------------|------------------------|-----------------|---------------------|----------------|---------------------------------------|----------------|-----------------|----------------|------------|-----------------|
| | | Hrs | Cost | Hrs | Cost | Hrs | Cost | Hrs | Cost | Hrs | Cost | Hrs | Cost |
| Direct Labor | | | | | | | | | | | | | |
| J. Peirson | \$220 | 0 | \$0 | 0 | \$0 | 2 | \$440 | 0 | \$0 | 2 | \$440 | 4 | \$880 |
| G. Chittick | \$200 | 4 | \$800 | 60 | \$12,000 | 4 | \$800 | 4 | \$800 | 6 | \$1,200 | 78 | \$15,600 |
| T. Mullens | \$190 | 0 | \$0 | 1 | \$190 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 1 | \$190 |
| D. Durette | \$180 | 4 | \$720 | 40 | \$7,200 | 4 | \$720 | 8 | \$1,440 | 0 | \$0 | 56 | \$10,080 |
| N. Trezza | \$150 | 12 | \$1,800 | 60 | \$9,000 | 16 | \$2,400 | 16 | \$2,400 | 0 | \$0 | 104 | \$15,600 |
| Total Direct Labor | | 20 | \$3,320 | | \$28,390 | 26 | \$4,360 | 28 | \$4,640 | 8 | \$1,640 | 243 | \$42,350 |
| Other Direct Costs | | | | | | | | | | | | | |
| Miscellaneous/Travel | | | \$0 | | \$0 | | \$0 | | \$0 | | \$250 | | \$250 |
| G&A on Other Direct Costs | | | \$0 | | \$0 | | \$0 | | \$0 | | \$25 | | \$25 |
| Total Other Direct Costs | | | \$0 | | \$0 | | \$0 | | \$0 | | \$275 | | \$275 |
| Total Cost | | | \$3,320 | | \$28,390 | | \$4,360 | | \$4,640 | | \$1,915 | | \$42,625 |

It has been assumed that the District will issue a contract or purchase order to MRS Environmental, Inc. to cover the proposed scope of work.

Attached please find our resumes. We very much look forward to helping the District with the environmental review of the proposed Project. If you have any questions, please do not hesitate to call me at 805.289.3924.

Best Regards,



Greg Chittick
 Principal Project Manager and Senior Engineer





List of MRS Environmental Inc Resumes

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| DEAN DUSETTE | 4 |
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| LUIS F. PEREZ..... | 9 |
| EDWARD (TED) B. MULLEN..... | 11 |

GREG CHITTICK

Project Role: Project Management, Hazards/Risk of Upset, Noise and Air Quality/GHG

Education: M.S. Mechanical Engineering, B.S Mechanical Engineering, UC Berkeley

Expertise: Project Management, Air Quality/GHG, Risk Assessments and Hazard Modeling, Acoustics, Technical Analysis. 30 years

Mr. Chittick is a Senior Scientist and Project Manager with MRS Environmental with more than 30 years of experience specializing in project management in combination with the technical analysis areas of safety, risk, air quality analysis, GHG analysis, noise, aesthetics, visual, traffic and GIS systems. At MRS, he has been involved in preparing and managing air quality studies and CEQA/NEPA environmental impact assessments, environmental technology studies, computer mapping analysis, modeling accidental releases of hazardous materials, and conducting risk analysis studies for small and large facilities. Mr. Chittick has worked with the local air districts for 30 years on an extensive range of projects. His combination of effective and efficient project management with extensive experience in technical analysis makes him an exceptionally well qualified project manager.

Mr. Chittick also worked for more than 10 years with Arthur D. Little, Inc., based in Boston, on risk, air quality and CEQA analysis. Mr. Chittick previously worked at Lawrence Berkeley Laboratory on studies related to building energy efficiency. Mr. Chittick is a member of the American Society of Mechanical Engineers, Southern California Association of Risk Analysis, the Chlorine Institute, and the International Institute of Ammonia Refrigeration.

Mr. Chittick's areas of expertise include:

Key Expertise:

- Air Quality and GHG Analysis
- Air Quality Modeling
- Health Risk Assessment Modeling
- Hazardous Materials Assessment
- Quantitative Risk Assessment
- Modeling of Accidental releases
- Acoustics Analysis
- Traffic Analysis
- Visual Assessments
- GIS Analysis

ENVIRONMENTAL IMPACT ASSESSMENTS HIGHLIGHTS

- Mr. Chittick has managed a number of environmental impact studies, including analysis on oil development and production facilities, pipeline, truck and rail transportation of crude oil, and refinery facilities. Recent projects include the ExxonMobil Interim Trucking EIR, Plains Pipeline EIR, County of Los Angeles Oil and Gas Strike team, County of Los Angeles Inglewood Oil Field Compliance and HRA project, CSLC Becker Well EIR, City of Carson Petroleum Administrator, City of Paramount Refinery Renewable Fuels Conversion EIR, CSLC Chevron El Segundo Marine Terminal, ExxonMobil Trucking EIR, Santa Maria Energy EIR and the Foxen Canyon Pipeline EIR. These projects were all related to CEQA.

- Mr. Chittick has performed technical impact analysis related to EIR and EIS projects in a number of different impact areas including risk and hazardous materials, air quality, GHG, traffic analyses, noise analysis, traffic analysis, visual impacts, and environmental justice.
- Mr. Chittick has completed numerous air quality analyses for more than 50 environmental assessment documents over the past 30 years. Analyses have included assessment of criteria pollutants, including emissions from hydrocarbon impacted soil handling; toxic pollutants, including AB2588 health risk assessments using HARP2 model; CO hot spots analysis and greenhouse gas emissions analysis, including electrical grid assessments; and indirect emissions. Modeling conducted as part of these analyses included AERMOD, SLAB, HARP2, CALINE4, CANARY and CalEEMod, among numerous others.
- Mr. Chittick assessed the quantitative risk impacts using QRA techniques on oil and gas projects, hydrogen plants and pipelines, offshore drilling, and production units as well as pipelines and marine terminals. Risk analysis examines risks to public health as well as the quantitative analysis of oil spill probabilities and impacts to the environment. Recent local analysis includes the Air Product Hydrogen Pipeline EIR, the Venoco Ellwood Lease Line Adjustment EIR and the Venoco Ellwood Line 96 Installation Project (for the CSLC).
- Mr. Chittick has conducted quantitative risk analysis for a broad range of transportation related projects, including transportation of gas liquids and ammonia on highways and pipeline transportation of crude oils. His studies have included developing QRA models, FN curves and mitigation measures to reduce risk impacts.
- Mr. Chittick has conducted numerous chemical release and dispersion modeling analyses, including releases of hydrogen, ammonia, gas liquids, hydrocarbons, produced gas containing hydrogen sulfide, and vapor from spilled combustible liquids, including crude oil. Models include CANARY, SuperChems, SLAB, AERMOD, Aloha, and multi-component models.
- His experience with noise analysis has included impacts of increased traffic, construction equipment operations, as well as in-field measurements of noise levels. Analysis included modeling of noise generated from a range of equipment, including assessing the attenuation of noise levels over barriers and terrain and assessing the effectiveness of a range of noise mitigation methods. Extensive experience and training in using the SoundPlan[®] software.

Experience for Environmental Projects

- Oil and Gas Well Strike Team Project: County of Los Angeles
- Baldwin Hills Oil Field Monitoring Project: County of Los Angeles
- City of Carson Oil and Gas Support: Designated Petroleum Administrator
- ExxonMobil Interim Trucking Project EIR: County of Santa Barbara
- PLAIN Pipeline replacement Project EIR: County of Santa Barbara
- E&B Oil Drilling and Production Project EIR: City of Hermosa Beach
- Whittier Oil Drilling Project EIR: City of Whittier
- Phillips 66 Company Rail Spur Project EIR: County of San Luis Obispo
- Becker and Legacy Wells Remediation Project: California State Lands Commission

DEAN DUSETTE

Project Role: Air Quality/GHG, Land Use, Recreation, Population and Housing, Public Services

Education: B.A. Geography, University of California Santa Barbara

Expertise: Land Use, Permitting, Air Quality, Auditing, Mitigation Measure Development, 30 years

Mr. Dusette is a Senior Scientist with MRS. Mr. Dusette's public agency work included project management, permitting, environmental review, permit condition compliance, field inspections and environmental data analysis for oil and gas projects. Additional public agency experience included preparation and management of a variety of CEQA documents, staff reports, recommendations to decision makers and public presentations. Mr. Dusette has worked on oil and gas related projects in California for 25 years.

Mr. Dusette spent 15 years working as an environmental consultant on a variety of environmental analysis and environmental compliance projects in California, Texas and Alaska. His major areas of expertise include environmental permitting and permit compliance, soil testing, data analysis, report preparation, and environmental impact assessment. Mr. Dusette has prepared and managed air quality permits for local, State and Federal agencies. Mr. Dusette worked as a contract technical expert to the Santa Barbara County Air Pollution Control District providing air quality and meteorological monitoring data quality assurance/quality control reviews and as field auditor of air and meteorological monitoring stations. Mr. Dusette also provided technical review and auditor services for air monitoring stations for the State of Texas. Mr. Dusette's environmental monitoring experience includes the preparation and implementation of Surface Water Quality Management Programs, Storm Water Pollution Prevention Plans and Ground Water Management Plans.

PROFESSIONAL EXPERIENCE

Mr. Dusette was involved with a variety of permitting, environmental review, compliance, and monitoring projects at Santa Barbara County. Those projects included:

- The Venoco Line 96 Modification Project: installation of a new pipeline from an existing oil and gas processing facility to a pipeline tie-in on the Gaviota Coast. The project involved permitting and oversight from multiple local and state agencies including the City of Goleta, California State Lands Commission and California Coastal Commission. Santa Barbara County acted as lead CEQA agency and Mr. Dusette, as Project Manager/Planner, performed application review, preparation and review of the project EIR, preparation of recommendations to decision makers, and made public presentations.
- System Safety Reliability Review Committee: a County working group made up of representatives from Fire, Air Pollution Control District, Building & Safety, and Office of Emergency Management tasked with oversight of major oil and gas facility safety compliance. Mr. Dusette was Chair of the Committee and managed the annual safety audits of seven facilities in Santa Barbara County.
- Remediation Projects: Mr. Dusette was Project Manager/Planner for several remediation projects generated from past oil and gas development activities. Projects included the Shell/Aera PCB Remediation Project on the Gaviota Coast, the Shell/Aera abandoned gravel road located in the Guadalupe Dunes, multiple hydrocarbon cleanup sites managed Chevron in Casmalia, and several oil and gas remediation sites in the Cat Canyon area. For the Shell/Aera PCB project, Mr. Dusette

represented Santa Barbara County on the project Interagency Working Team consisting of staff from the State Department of Toxic Substances Control, the State Regional Water Quality Control Board, California Department of Fish & Wildlife, and County Fire.

- **Oil and Gas Permit Compliance:** Mr. Dusette was Project Manager/Planner overseeing compliance and new permitting for many of the larger oil and gas projects in Santa Barbara County. Project activities included permit condition effectiveness review, review of monitoring data and compliance reports, safety audits, and permitting for facility modifications and new equipment. Projects included ExxonMobil Santa Ynez Unit, FMO&G Pt. Arguello and Pt. Pedernales Projects, Phillips 66 Orcutt Pump Station/Santa Maria Tank Facility, Venoco Ellwood Onshore Facility, Venoco Ellwood Marine Terminal, and E&B Resources Cuyama Gas Plant.
- **Air Quality Impact Assessment and Permitting:** as an environmental consultant, Mr. Dusette prepared air quality impact assessments and associated permit applications for a variety of clients and jurisdictions in California. Projects included an air toxic air quality risk assessment for SCE's Mandalay Beach Power Plant, compliance permitting for the City of Burbank, Air Toxic Inventory and Plan reporting for Venoco's Ellwood Onshore Facility, and air quality permit compliance for ExxonMobil's Santa Ynez Unit. Mr. Dusette has coordinated air quality permitting projects with Santa Barbara County Air Pollution District, Ventura County Air Pollution District, South Coast Air Quality Management District, the California Air Resources Board and the EPA.

Mr. Dusette has worked on a variety of environmental and compliance projects with MRS including:

- Orcutt Hill Resource Enhancement Plan Project: Santa Barbara County
- Venoco South Ellwood Field Project: California State Lands Commission
- Phillips 66 Company Rail Spur Extension and Crude Unloading Project EIR: County of San Luis Obispo
- Becker and Legacy Wells Abandonment and Remediation Project: California State Lands Commission
- E&B Oil Drilling and Production Project EIR: City of Hermosa Beach
- Baldwin Hills Oil Field Monitoring Project: County of Los Angeles
- Assisting County of Santa Barbara for Analysis for Energy Projects
- City of Carson Oil and Gas Support
- County of Los Angeles Oil and Gas Well Inventory Project
- County of Los Angeles Strike Team Phase I and Phase II Projects

Mr. Dusette is a CalEPA Registered Environmental Assessor and has 40 Hour Hazwoper Certification.

NICOLE TREZZA

Project Role: GIS, QA/QC, Recreation, Population and Housing, Public Services.

Education: B.S. in Environmental Studies from the University of California, Santa Barbara

Expertise: Document production

Ms. Trezza is a Scientist with MRS Environmental. Ms. Trezza has two years of experience working as an environmental consultant on a variety of environmental analysis and environmental compliance projects in California. Her experience with MRS includes preparation of CEQA documents, environmental review and data analysis, and environmental impact assessment. Ms. Trezza also serves as Technical Editor and Document Production Specialist during the preparation of CEQA documents and reports. Ms. Trezza has contributed to the successful completion, production and delivery of several environmental review documents including the Air Products Hydrogen Pipeline Project EIR and the Air Products Hydrogen Liquefaction Project Initial Study and Mitigated Negative Declaration, both for the City of Carson, and the Paramount Petroleum AltAir Renewable Fuels Conversion Project Subsequent EIR Initial for the City of Paramount. As Technical Editor, her responsibilities include the oversight of consistency within style parameters for large multi-section documents including EIRs and other CEQA documentation. She performs assignments relative to editing and proofreading, word processing, and formatting.

Ms. Trezza received her B.S. in Environmental Studies from the University of California, Santa Barbara.

JOHN F. PEIRSON, JR.

Project Role: Principal in Charge, QA/QC Manager and Contracting Manager

Education: M.S. Chemical Engineering Columbia University, B.S. Mathematics, Hartwick College

Expertise: Project Management, Air Quality - 35 years

Mr. Peirson is a Principal of MRS. Before joining MRS, he was a Principal in Arthur D. Little's Environmental Health & Safety Practice and Director in their Santa Barbara and Ventura offices. For more than 25 years, Mr. Peirson has been extensively involved in preparing CEQA documents for various state and local agencies.

Mr. Peirson has been involved CEQA permitting activities since 1983. He has participated in the preparation and CEQA permitting of more than 60 major projects within California. Most of these projects have been very controversial and involved considerable work in developing permitting strategy. None of the EIRs that John Peirson has led have ever been overturned in Court.

Mr. Peirson has provided more than 600 hours of testimony to local and state decision makers which have included Planning Commissions, Boards of Supervisors, the State Lands Commission and the California Coastal Commission. He also has extensive experience in working with local and state government staff in developing permit conditions and findings associated with development projects.

PROFESSIONAL EXPERIENCE

Mr. Peirson's relevant assignments include the following:

- Mr. Peirson is currently the Project Manager for the Guadalupe Oil Field Remediation Environmental Monitoring Project. He has been managing this ongoing project since 1998. Mr. Peirson oversees a team of biologists and engineers who have developed strong working relationships with the field personnel at the Guadalupe site, as well as with the regulatory staff who are responsible for overseeing the remediation and abandonment activities. Mr. Peirson stays in close contact with staff from the California Coastal Commission, Regional Water Quality Control Board, San Luis Obispo County Air Pollution Control District, California Department of Fish and Game, U.S. Fish and Wildlife Service, and U.S. Army Corps of Engineers.
- Mr. Peirson recently completed an EIR for the County of Los Angeles covering the development of a Community Standards District (CSD) for the Baldwin Hills Oil Field. The project involved the evaluation of a hypothetical development scenario to determine the level of impacts and associated mitigation measures. The mitigation measures were then used to develop a CSD, which would serve to regulate any future development within the Boundaries of the CSD. Mr. Peirson was responsible for managing the preparation of the EIR and for drafting the CSD provisions. This project required working closely with the landowners and concerned citizens in the preparation of the EIR and the CSD.
- Mr. Peirson was Project Manager for Santa Barbara County's Tranquillon Ridge Oil and Gas Development Project, LOGP Produced Water Treatment System Project, and Sisquoc Pipeline Bi-Directional Flow Project EIR. This complicated EIR assessed the environmental impacts associated with three different but interrelated projects proposed by three applicants. The proposed Tranquillon Ridge Project would involve the development of oil and gas wells in a proposed State Tidelands Lease from Platform Irene, which is in Federal Waters and is currently used to develop and produce the Point

Pedernales Field. This EIR involved a wide range of alternatives for oil development, pipeline replacement, processing facility location, and drill mud/cuttings disposal.

- Mr. Peirson was a Project Manager for the Chevron Point Arguello Field EIR/EIS which evaluated the environmental impacts of three offshore oil and gas platforms, oil and gas pipelines, and a large oil and gas processing facility.
- Mr. Peirson was the program manager for the Chevron Point Arguello Field Q-6 Supplemental EIR, which addressed the transportation of oil by tanker from the Gaviota Interim Marine Terminal. As part of this Supplemental EIR, he helped develop an air quality impact analysis for various tanker routes as well as for most of the alternatives covered in the Gaviota Marine Terminal Supplemental EIR/EIS. Mr. Peirson was also responsible for the preparation of the alternatives description and screening analysis done as part of the Q-6 Supplemental EIR.
- In addition, Mr. Peirson was the Project Manager for the Unocal Point Pedernales Supplemental EIR prepared for Santa Barbara County. This document addressed the impact associated with the construction of a new gas plant near Lompoc, as well as the effect that the closing of the Battles Gas Plant would have on other gas producers within Northern Santa Barbara County and Southern San Luis Obispo County. This study required existing oil and gas facilities in the study area to be evaluated, which include all of the existing Unocal facilities. This document presented one of the most comprehensive insights into oil and gas development activities within Northern Santa Barbara County.

LUIS F. PEREZ

Project Role: Project Management, Land Use, Recreation, Population and Housing, Public Services

Education: M.A. Organizational Management Fielding Graduate University, B.A. Environmental Science and Public Relations, Northern Arizona University

Expertise: CEQA Project Management, Land Use Analysis, Permitting and Compliance - 32 years

Mr. Perez is a Senior Project Manager with MRS Environmental. Before joining MRS, Mr. Perez acquired extensive public agency experience working for Santa Barbara County, which included interpretation of land use and environmental policies and regulations for large oil and gas development projects, recommendations to decision-makers and public presentations. He was an Energy Specialist with the Santa Barbara County Energy Division for 16 years, working on permitting and environmental review for onshore and offshore oil and gas projects. Mr. Perez is involved with the management and preparation of environmental studies, primarily focusing on the implementation of CEQA for oil and gas development projects in California. His major areas of expertise are in land use issues of major oil and gas development and transportation projects. Mr. Perez has extensive experience in the preparation of environmental documents, staff reports for decision-makers, presentations for decision-makers, public workshops and hearings.

PROFESSIONAL EXPERIENCE

While working for MRS Environmental, for the last 15 years Mr. Perez has worked as Project Manager on the preparation of the Paramount Refinery Conversion Project SEIR, the Air Products Hydrogen Pipeline Project EIR for the City of Carson, the Plains Pipeline Replacement Project EIR/EIS, the California State Lands Commission Becker Well EIR, the Hermosa Beach Oil Development Project EIR, the Whittier Main Oil Field EIR, Paredon EIR, the Baldwin Hills Community Standards District EIR, the Conoco-Phillips Santa Maria Refinery Expansion EIR, the Chevron El Segundo Marine Terminal Lease Extension EIR, the Guadalupe Oil Field Fencing Plan, and the preparation of the Venoco Full Field Development Project EIR. Mr. Perez also served as Project Manager for the Los Angeles County Strike Team efforts on oil and gas development projects.

Mr. Perez was the Project Manager for multiple oil and gas development projects for the County of Santa Barbara. Those projects included:

- The Pacific Pipeline Project, which was a proposal for construction of a pipeline from the Gaviota Area to refineries in Los Angeles. The Molino Gas Development Project, which was the first project approved for drilling from an onshore location into an offshore reservoir. The Chevron Point Arguello Project, which included three platforms, oil and gas pipeline and an onshore processing facility. Mr. Perez reviewed applications, conducted environmental review and processed permits for various proposals, including Marine Tankering, Process Reconfiguration, and the Rocky Point Unit drilling project, among others.
- Mr. Perez was also the Project Manager for a number of decommissioning of oil and gas projects that had reached the end of their economic life. Those projects included the abandonment of the Texaco Pipeline through Hollister Ranch, the decommissioning of the Unocal Cojo Marine Terminal and the decommissioning of the Texaco Gaviota Gas Plant, among others. In addition, Mr. Perez led the team effort required to oversee compliance with mitigation required for the execution of the different projects.

- While working for the County, Mr. Perez was also tasked with the management and supervision of the contract to provide Oil and Gas permitting and compliance services to the City of Goleta by Santa Barbara County. The efforts included to manage and supervise teams, report writing, public hearings and presentations for the Venoco Full Field Development Project, Venoco State Lease 421 Repairs, and Venoco Line 96 SCADA system.
- Mr. Perez also managed the contract to provide oil and gas permitting and compliance services to the City of Carpinteria, which included application completeness review, policy considerations, and preparation of environmental documents.
- Mr. Perez has also acquired significant experience in the implementation and compliance of oil and gas and construction projects by overseeing the operation of the All American Pipeline Project, the Chevron Point Arguello Project, the Gaviota Marine Terminal Project, the Exxon Santa Ynez Unit Project, the Santa Maria Asphalt Refinery, among others.

Mr. Perez was the government liaison for the permitting and compliance of the construction of the Cano Limon-Rio Zulia Pipeline Project in Colombia, South America for Mannesmann Anlagenbau, AG. The project involved coordination with multiple agencies, preparation of documents, emergency response preparedness training, and environmental restoration.

Mr. Perez received his M.A. in Organizational Management from Fielding Graduate University and received a B.A. in Environmental Science and Public Relations from Northern Arizona University.

EDWARD (TED) B. MULLEN

Project Role: QA/QC Biological Resources

Education: M.A. in Biological Sciences from the University of California, Santa Barbara, B.S. in Biology from Loyola Marymount University

Expertise: Biology

Mr. Mullen has 20 years of experience in terrestrial ecology and environmental analysis. His experience as a project manager and technical contributor includes managing the Natural Resource sections of several California Environmental Quality Act documents and preparing baseline biological resource studies, habitat evaluations, regulatory compliance, and environmental impact assessment under the National Environmental Policy Act and CEQA. Before joining MRS, Mr. Mullen managed a team of nine biologists for Science Applications International Corporation, in Santa Barbara, California.

Mr. Mullen has also managed large-scale monitoring programs with specific emphasis on issues concerning sensitive wildlife species. He has many years of experience with sensitive species protection plans and technical exchange meetings with industry and agency representatives. He conducted field surveys in more than 20 states and has conducted sensitive species surveys or prepared management plans for tidewater goby, desert tortoise, California red-legged frog, California tiger salamander, southwestern pond turtle, American badger, San Joaquin kit fox, light-footed clapper rail, Belding's savannah sparrow, western snowy plover, southwestern willow flycatcher, and burrowing owl. He managed the research and reporting on a desert tortoise mitigation project, managed biological resources inventories on Vandenberg AFB, supervised field crews on a pipeline project spanning three states, and participated in creating and implementing a monitoring plan for an extensive California pipeline project.

Mr. Mullen served as the Onsite Environmental Coordinator at the Unocal Guadalupe Oil Field in support of San Luis Obispo County, California Coastal Commission, California Department of Fish and Game, U.S. Fish and Wildlife Service, and the Regional Water Quality Control Board. Mr. Mullen managed the onsite monitoring efforts of the long-term oil field clean-up remediation project. His responsibilities included coordinating permit compliance, directing field monitors, and preparing status reports for all agencies on issues concerning water quality, listed species protection, wildlife and botanical resources, air quality, habitat protection, and remediation techniques. Listed species prevalent on the site and relative to day-to-day environmental decision-making included western snowy plover, California red-legged frog, tidewater goby, la Graciosa thistle, and Surf thistle.

Mr. Mullen received his M.A. in Biological Sciences from the University of California, Santa Barbara (1990) and his B.S. in Biology from Loyola Marymount University (1987).

PROFESSIONAL EXPERIENCE

- From 2000 through 2009, Mr. Mullen managed the Natural Resource sections and contributed biological resources analyses to several complex environmental impact reports or general plans in compliance with CEQA for the Santa Barbara County Department of Planning and Development. The projects included:
 - The Mahoney Residents EIR in Santa Maria, California, which assessed the impacts of a housing development on California red-legged frogs and California tiger salamanders.

- The Venoco Ellwood Full Field Development EIR, for which Mr. Mullen managed the SAIC team effort assessing new facilities at the Ellwood Facility.
- The Venoco Paredon EIR, which assessed impacts to biological resources from new facilities and drilling at the Carpinteria Facility.
- Mr. Mullen served as the Onsite Environmental Coordinator for the Chevron-Unocal Guadalupe Oil Field Remediation Project for the County of San Luis Obispo Department of Planning and Development. For this \$3 million project, Mr. Mullen coordinated and managed the mitigation monitoring program of a long-term, large-scale oil field clean-up project in support of San Luis Obispo County, California Coastal Commission, California Department of Fish and Game, U.S. Fish and Wildlife Service, and the Regional Water Quality Control Board. Responsibilities included coordinating permit compliance, directing field monitors, and preparing status reports for all agencies on issues concerning water quality, listed species protection, wildlife and botanical resources, air quality, habitat protection, and remediation techniques. Listed species that are prevalent on the site and relevant to day-to-day environmental decision-making included western snowy plover, California red-legged frog, tidewater goby, la Graciosa thistle, and Surf thistle.
- Mr. Mullen prepared the revised biological baseline and analysis for the Lompoc Windfarm EIR for the County of Santa Barbara. This project, located in Lompoc, California, assessed the impact of the installation and operation of an 80-turbine wind farm on biological resources, specifically, avian and bat species.
- Mr. Mullen managed the preparation of four Natural Resource sections (Biology, Archaeology, Geology, and Water Resources) of the PXP Baldwin Hills Community Standards District EIR for the County of Los Angeles. The EIR analyzed the effects of an application to establish a Community Standards District for the continued use of the Inglewood Oil Field.
- Mr. Mullen managed several resource areas (e.g., biology, agriculture, geology, water resources) for the MRS-SAIC jointly prepared Guadalupe Unocal Oil Field Restoration EIR to consider complex environmental issues for San Luis Obispo County.
- Mr. Mullen provided biological resources support to SAIC staff at the Chevron Chemical Plant in the City of Richmond, California. His support included managing avian surveys and preparing the final report that detailed an impact analysis on wildlife exposure to contamination within the refinery.
- Mr. Mullen served as the Project Manager for the Air Products Hydrogen Pipeline Project in Contra Costa, California, for MRS. This project assessed a proposed 12-mile hydrogen pipeline in Contra Costa County and included surveying and mapping vegetation habitats, native trees, sensitive plant and wildlife species, and wetland delineations and waters of the U.S.
- Mr. Mullen served as the Project Manager for biological resource surveys and reporting for the Santa Barbara Ranch property to be used as part of the baseline EIR for the 484-acre site in Gaviota Coast in Santa Barbara County. He managed a team of biologists that conducted surveys for sensitive wildlife species, native grasslands, general vegetation, and rare plants; performed wetland delineation surveys; and prepared a vegetation habitat map of the site.

- Mr. Mullen provided on-call biological services for Union Asphalt Company between 2004 and 2006. These services included conducting avian surveys to establish for the Bradley Mining operations site and conducting sensitive wildlife surveys in support of permit application for continued mining within the Sisquoc River for the Garey Mining operations site.

ADDITIONAL TRAINING

- Desert Tortoise Handling Workshop, 1993.
- Mohave Ground Squirrel Cumulative Human Impact Evaluation Format Workshop sponsored by the California Department of Fish and Game, 1992.
- The Willow Flycatcher Workshop in San Diego, 1995.

PUBLICATIONS AND PRESENTATIONS

- Mullen, E.B. 1990. The Evolutionary Stability of Signals of White-Crowned Sparrows. Master's thesis, University of California, Santa Barbara.
- _____. 1993. Survival of Relocated Tortoises: Feasibility of Relocating Tortoises as a Successful Mitigation Tool. Presented at the Conservation, Management, and Restoration of Tortoises and Turtles — An International Conference. American Museum of Natural History, July.
- _____. 1993. Health and Condition Index of Relocated Tortoises: Feasibility of Relocating Tortoises as a Successful Mitigation Tool. Symposium Proceedings of the Desert Tortoise Council.
- Ross, P. and E.B. Mullen. 1993. Terrain Use and Movement of Relocated Tortoises: Feasibility of Relocating Tortoises as a Successful Mitigation Tool. Symposium Proceedings of the Desert Tortoise Council.
- Mullen, E.B. 1995. Wildlife Monitoring of Created Dune Swale Wetlands on the San Antonio Terrace, Vandenberg Air Force Base, California. Wetland Interagency Workshop on Wetlands.
- _____. 1999. Wildlife Monitoring of Created Wetland Habitat at Vandenberg Air Force Base, California. Presentation for the U.C. Santa Barbara University's Habitat Restoration Group.
- _____. 1999. Analyzing the Success of Recommended Mitigation Measures for California Red-Legged Frogs and California Tiger Salamanders. Presented at the Annual Conference of The Wildlife Society's Western Division in Monterey, California, January 23.

From: [Lindsay Cokeley](#)
To: [David I. Harris](#); [Carly V. Barham](#)
Cc: andriana@ccagriculture.com; [Alex Economou](#); [William S. Sarraf](#); [Matthew Allen](#)
Subject: Re: ATC 15634 - Notification of Contractor Support
Date: Tuesday, November 1, 2022 4:55:37 PM

Hello David and Carly,

We are ready to move forward with MRS Environmental as the consultant and we do not have any alternative proposals. As far as the scope is concerned, can you please answer the below questions?

The proposal from MRS Environmental states that our facility is requesting a permit for an expansion of existing operations. What is the District considering to be existing versus proposed for our permit? It's our understanding that the ATC 15634 includes the existing operation plus BACT for our solvent use, and all operations are considered existing.

After speaking with Carly last week, I was under the impression that a MND may not be required depending on the baseline that is established. How will the baseline be determined? If it turns out that a MND is not required, will the consultant make that determination, or will it be a collaborative effort with CCA involved?

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

I am currently out of the office for family leave on Mondays, Wednesday after 2pm and Friday after 12pm.

On Fri, Oct 21, 2022 at 1:14 PM Maria Sales <SalesM@sbcapcd.org> wrote:

Dear Andriana Villalpando:

Attached is a copy of the Authority to Construct Application 15634 – Notification of Contractor Support.

Should you have any questions, please contact David Harris at (805) 979-8311 or at HarrisD@sbcapcd.org.

Sincerely,



Maria San Juana Sales
Office Technician
Air Pollution Control District
Santa Barbara County

SalesM@sbcapcd.org

(805) 979-8295

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

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County of Santa Barbara
 Purchasing Agent
 260 N San Antonio Rd,
 Santa Barbara, CA 93110

Order CN3579

Order date
 12/12/2022

Delivery address
 Santa Barbara County
 AIR POLLUTION CONTROL DISTRICT
 260 N SAN ANTONIO RD #A
 SANTA BARBARA, CA
 93110

 805-979-8291

Vendor
 73417
 MRS ENVIRONMENTAL INC

 1306 SANTA BARBARA ST
 SANTA BARBARA
 CA
 93101
 GREG CHITTICK
 GREG.CHITTICK@MRSENV.COM

Bill To
 Santa Barbara County
 260 N. SAN ANTONIO RD. SUITE A, SANTA BARBARA, CA
 93110

Refer Inquiries to Buyer
 Christian Garcia
 cgarcia@countyofsb.org

Terms of payment
 30 days

| Item/Comments | Description | Preferred delivery date | Quantity | Unit | Price | Amount |
|---------------------------|--|-------------------------|----------|------|-----------|-----------|
| 000271- AIR QUALITY STUDY | The District is the lead agency under the California Environmental Quality Act (CEQA) for this project. Contractor to assist in preparing an Initial Study-Mitigated Negative Declaration (IS-MND) for the Central Coast Agriculture Cannabis Manufacturing and Distribution Facility) | 2023-06-30 | 1.00 | Lot | 42,625.00 | 42,625.00 |

Order Total USD **42,625.00**

SERVICE CONTRACT (CN)

GENERAL: Contractor to assist in preparing an Initial Study-Mitigated Negative Declaration (IS-MND) for the Central Coast Agriculture Cannabis Manufacturing and Distribution Facility as per MRS Environmental Inc proposal dated September 23,2022.


CONTRACT PERIOD: Start date, as directed. Termination date, as directed and NO LATER THAN 6/30/2023.

LIMITATIONS: Total expenditure for the period shall not exceed \$42,625.00. Any increase or decrease in this total amount may be authorized only upon written notice from the County Chief Procurement Officer.

STANDARD TERMS AND CONDITIONS FOR INDEPENDENT CONTRACTORS (ver. 2018 03 23) attached.

THIS CONTRACT IS NOT VALID FOR AMOUNTS IN EXCESS OF TWO HUNDRED THOUSAND DOLLARS (\$200,000)

NOTE TO CONTRACTOR: No payment will be due or payable unless this contract is properly executed and returned to the County Purchasing Office. Do not commence performance until you have executed this contract and returned it to the County of Santa Barbara Purchasing Division, 260 N San Antonio Rd, Santa Barbara, CA 93110.

Accepted By: (X) 
Print Name/Title: Greg Chittick Date: 12/12/22
Applicable License # (Medical/Contractor/Etc.): NA

Phung Loman
COUNTY OF SANTA BARBARA

Alex Economou

Subject: CCA Kick-Off Meeting
Location: Microsoft Teams Meeting

Start: Wed 1/4/2023 11:00 AM
End: Wed 1/4/2023 12:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Alex Economou
Required Attendees: Alex Economou; Carly V. Barham; Greg Chittick
Optional Attendees: David I. Harris; Nicole Trezza; dean

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 251 683 668 615

Passcode: FYCc2a

[Download Teams](#) | [Join on the web](#)

Or call in (audio only)

[+1 805-699-6941,,896971018#](#) United States, Santa Barbara

Phone Conference ID: 896 971 018#

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[Learn More](#) | [Meeting options](#)

From: [Lindsay Cokeley](#)
To: [Carly V. Barham](#)
Cc: [David I. Harris](#); [Alex Economou](#)
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations
Date: Wednesday, January 11, 2023 11:55:25 AM

Hi Carly,

We have reviewed and we don't believe anything here would be proprietary. I do have a question about the review of this for CEQA. Should we need to phase in an increase in production and need to add additional BACT equipment to keep the emission levels down to what we proposed as a part of the project, how could we revise the project to include a future scale-up and subsequent BACT for emission control down to the levels proposed?

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Wed, Jan 4, 2023 at 3:10 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Good afternoon and Happy New Year Lindsay and Andriana,

The District had a meeting this morning with the environmental consultant (MRS) assisting us with CEQA review for ATC 15634. The District and MRS are preparing a data request for your review and attention. As we discussed the last time we spoke, we will be asking for further information to clarify your project's baseline and other project details.

We also wanted to provide the consultant with our estimation of the air emissions from your project, however we do not want to supply any information CCA deems confidential. I went through the attached spreadsheets and removed any reference to product names. General process description, usage, and percent capture/control remains. **Please carefully review the attached spreadsheets and let us know if there is anything that should be further redacted before we share with the consultant.**

Thank you,

Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org

805.979.8337

Out of office Wednesdays

ourair.org [@OurAirSBC](#)

[Sign Up for Air Alerts](#)

From: [Carly V. Barham](#)
To: [Lindsay Cokeley](#)
Cc: [David I. Harris](#); [Alex Economou](#); [William S. Sarraf](#); [Greg Chittick](#); [dean](#); nicole.trezza@mrsenv.com
Subject: ATC 15634 - Data Request for CEQA Review
Date: Friday, January 27, 2023 3:17:34 PM
Attachments: [ATC 15634 Data Request 01-27-23.docx](#)

Good afternoon Lindsay,

After coordination with the environmental consultant, we have prepared a comprehensive data request that will help facilitate the environmental review of your project. Our goal would be to have responses as soon as possible so that we can continue to move ahead with analysis of your project. We request that Item 1, 2, and 18 be addressed no later than Monday, February 13.

Please let me know if you have any questions. We'd be happy to set up a time to walk through any of these items and include the consultant as well.

Thank you,
Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.979.8337

Out of office Wednesdays

ourair.org [@OurAirSBC](#)

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ATC 15634 Data Request – 1/27/2023

Provide responses to the items below. If responses to any of the items below require the provision of confidential information, provide two versions of your responses: a confidential version and a redacted version absent confidential information. See District Policy and Procedure for Handling of Confidential Information: www.ourair.org/wp-content/uploads/6100-020-1.pdf.

Project Description/Project Site

1. Confirm the attached project description.
2. Provide an existing and proposed equipment list for the facility. Note that the existing equipment list should include the currently installed and operating equipment as of January 2023. The proposed equipment list should include any and all equipment that you are requesting to be permitted as part of ATC 15634. Please identify which equipment is existing and which is proposed. The equipment list should also indicate the equipment size and volume, throughput and other pertinent characteristics.
3. Business hours: _____
4. Number of employees: _____
5. Site acreage: _____
6. Square footage of the facility and all buildings: _____
7. Number of vehicle parking spaces: _____
8. Landscaping coverage (square footage): _____
9. General Plan designation: _____
10. Zoning: _____
11. Surrounding uses/zoning: _____
12. Does the project involve grading or demolition? _____ If yes, please describe.

13. Are any trees or vegetation proposed for removal? _____
14. Is the project site within one-quarter mile of a school? _____
15. Is the project site in a FEMA flood hazard zone? _____

Permits/Approvals/Plans

16. What types of other permits, approvals, plans does your operation require in addition to State Licenses and City of Lompoc Commercial Cannabis Use License?

17. Provide copies of the facility's State Cannabis Licenses:
 - a. CDPH-10003156,
 - b. C13-0000496-LIC, and
 - c. C13-001094

Solvent Recordkeeping

18. In CCA's July 2022 response to District incompleteness items, annual solvent data for 2021 was provided in a table entitled "Solvent Purchase_ Receipt History, 7/13/2022". In the July 2022 response, CCA stated that its internal solvent tracking has been fine-tuned for concise reporting in accordance with permitting requirements and that CCA has worked diligently over the past year to rectify the web form and provide adequate training to authorized employees utilizing solvents. Provide all available solvent reporting from July 2022 (or earlier as available) to present. Data on at least a monthly basis is preferred if available. Include data to substantiate purchase and/or usage amounts, such as purchase receipts or other internal reporting/recordkeeping.
19. The type of solvent is on the previously provided MSDS or SDS: provide updates if the solvent is anticipated to change with the project.
20. Provide total amounts of solvent stored onsite.

Utilities

21. Does the project require upgrades to the electrical system or installation of additional electrical power, such as a substation?

Hydrology/Water Quality

22. Would the project increase the impervious surfaces on-site?
23. What is the facility's water source? Public/municipal water, private well, share water system? Water provider and contact information was provided previously through 2021 approximately: please provide data through 2022.
24. Will your proposed project result in an increase in water use at the facility? If so:
 - a. Describe what equipment/processes account for the increased use.
 - b. Provide the existing and proposed water use for the facility.
25. In the event of a flood at the facility, is there a risk of releasing pollutants due to project inundation or accidental release? Describe drainage system, containment systems and stormwater systems.

Wastewater

26. Will any industrial effluent (non-domestic wastewater) from the facility be discharged into the public sewer system?

Hazardous Waste

27. Does your facility generate hazardous waste? If yes, please describe what type of waste is generated, liquid, solid, or both.
28. Will your proposed project result in an increase in liquid or solid waste disposal at the facility? If so:
 - a. Describe what equipment/processes account for the increased use.
 - b. Describe the storage procedures for non-hazardous and hazardous waste.
29. For liquid waste, submit verification from the Regional Water Quality Control Board that Waste Discharge Requirements apply or those exemptions from such requirements have been granted.
30. For solid waste, provide the following: Note that hazardous waste manifests were provided previously, but are difficult to read as a scanned version. Please provide a summary table of hazardous waste shipments and type and date.
 - a. Type and volume of wastes.
 - b. Method and frequency of cleaning.
 - c. Means of waste transport, including the transportation company for hazardous materials
 - d. Description of short-term storage facilities.
 - e. Method and area of waste disposal.
31. Do you have a manufacturing solid waste management plan and/or a hazardous material business plan? Provide copies.
32. Are the operators of the facility required to submit a hazardous waste management plan to the Manufacturing Cannabis Safety Branch of the California Department of Public Health? If so, please provide or provide a basis for an exemption.
33. Will the project be required to prepare a pest management plan to comply with California Code of Regulations Section 8106(a)(3)? If so, please provide or provide a basis for an exemption.
34. Will use of volatile and non-volatile extraction processes be approved by the City Building and Fire Department? If so, please provide approval or a basis for exemption. Has the facility been inspected by the Fire Department? Provide inspection reports and Fire Department contact information. Describe fire protection and detection measures installed onsite currently and proposed as part of the project, including flammable gas detection, sprinkler systems, alarms, notification systems, audible and visible systems.
35. Please provide a manufacturing license from the California Department of Public Health documenting engineering certification for the extraction system, or provide a basis for exemption.

Wildfire

36. Do you have adequate fire protection water supplies capable of supplying the required fire flow for fire protection? Provide information on the closest fire hydrant.
37. Do you have adequate apparatus access for all facilities and structures?

38. Do you have an operational permit from the fire department?

39. Are fire sprinklers provided as required per Building, Fire, and/or City codes?

Transportation

40. Provide levels of traffic by time of day: daytime, evening, nighttime.

41. What are the routes of ingress and egress from the site on to area roadways and highways?

Other Items

42. Would the project produce changes to the aesthetics of the exterior of the building, such as additions that could increase the height or size of the building, etc. Would lighting be added to the exterior of the building? Provide specifics if so.

43. Would the project involve construction and, if so, what levels of vehicle trips would be required to deliver construction materials and equipment to and from the site. Would any grading be required and, if so, provide specifics?

44. Have the current or historical operations ever produced complaints from neighbors for noise, odors or any other issue? If so, please explain.

45. Have the current or historical operations ever caused a release of materials to the environment? If so, please explain.

46. What current or historical measures are in place to minimize odor and air quality impacts to the area neighbors?

47. What noise sources are present at the site currently and would be added to the site as part of the project, such as generators, HVAC, exhaust fans, alarms, etc.? Please describe the equipment and the periods of time when they may be operating.

48. How will carbon canister systems be monitored for replacement? Please describe if there is a monitoring system or if they are replaced on a periodic basis routinely?

Attachment: Project Description – Please Confirm

Central Coast Agriculture (Central Coast Ag Products, CCA Products LLC and CCA Distribution LLC) has applied for an Authority to Construct permit for an existing cannabis manufacturing and distribution facility at 1201 W. Chestnut Avenue and 1200 W. Laurel Avenue in the City of Lompoc. 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. The project site is identified as Assessor Parcel Numbers (APNs) 091-040-061 and 091-040-026.

The facility produces various products from raw cannabis plant material. These products include live resin, live sauce, diamonds, vape cartridges, whole flower, and pre-rolls. Proposed operations at the facility will consist of volatile extraction, non-volatile extraction, post-extraction refinement, processing (drying, trimming, sorting, etc.), storage, packing, labeling and distribution. Specifically, the facility uses both volatile and non-volatile extraction methods to convert biomass into concentrated oil products. Specialized equipment will be used at the facility.

The products are then packaged for off-site shipment. The facility will operate 24 hours per day, 5 days per week, 52 weeks per year.

Odors generated from the process will be controlled by a carbon absorption system installed throughout the facility. Odor control devices include rechargeable carbon canisters using activated carbon with a sorbent weight per unit of 240 lbs and exhaust fan with a capacity of 3,500 scfm. In addition, four (4) replaceable carbon cannister units using activated carbon with a sorbent weight per unit of 12 lbs and one exhaust fan with a capacity of 740 scfm will be used.

Solvent emissions will be controlled with various technologies including closed-loop volatile extraction booths and two-stage cold traps. The potential solvent emissions

The cold trap solvent recovery technology collects and liquefies solvent vapors (ROCs) for reinjection into the extraction process or other recycling measures. The cold trap is estimated to achieve 99% recovery of solvent. There are some process areas where the solvent vapors will not be recovered through the cold trap, so although the cold trap efficiency is estimated at 99%, the overall facility solvent recovery efficiency could be slightly lower. The combined extraction equipment and cold trap recovery is estimated to recover 96% of the total extraction solvent used daily in the facility.

The proposed operations will result in employee/worker vehicle trips (approximately 50 vehicles per day). Various contractor and delivery trips will also occur (approximately 4 vehicles per day). The facility is served by PUC natural gas for heating and PG&E provides electricity. Solvent-contaminated debris 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 licensed hazardous waste hauler. Hazardous waste is collected, logged, labeled, and stored before being picked up by licensed hauler for disposal. The facility also currently includes an existing 539 HP Tier 3 diesel emergency stand-by generator engine at 1201 W. Chestnut Avenue and a 762 HP Tier 2 diesel generator engine for emergency back-up power supply at 1200 W. Laurel Avenue.

From: [Kaitlin E. McNally](#)
To: [Lindsay Cokeley](#)
Cc: [David I. Harris](#); [William S. Sarraf](#); [Carly V. Barham](#)
Subject: RE: ATC 15634 - Confirmation of Public Emission Calculations
Date: Friday, February 10, 2023 1:57:25 PM

Hello Lindsay,

I apologize for taking so long to get back to you. In regards to your decision about what project to pursue, you should take into consideration that CCA's manufacturing facility located at 1201 W Chestnut in Lompoc is currently and will continue to be in violation until the final APCD permit is issued. Furthermore, each and every day is considered a separate violation and is subject to additional daily penalties. Therefore, from a compliance perspective, it is in CCA's best interest to get a final permit as soon as possible. I hope this information is helpful.

Best regards,

Kaitlin



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805.979.8298

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Sent: Tuesday, January 31, 2023 4:48 PM
To: Kaitlin E. McNally <McNallyK@sbcapcd.org>
Subject: Fwd: ATC 15634 - Confirmation of Public Emission Calculations

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Director, Compliance | CCA

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Date: Thu, Jan 26, 2023 at 3:39 PM

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To: Lindsay Cokeley <lindsay@ccagriculture.com>

Cc: David I. Harris <HarrisD@sbcapcd.org>, Kaitlin E. McNally <McNallyK@sbcapcd.org>

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Sincerely,
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Please let me know if you have any questions.

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Sent: Wednesday, January 18, 2023 10:51 AM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Carly and David,

I can do this Friday at 9:30am.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

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Thank you,

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Director, Compliance | CCA

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One other thing I wanted to confirm. I was looking through your redacted incompleteness response from July 13, 2022 ("ATC15634Response07132022_FullPackage_Redacted.pdf"), I noticed that on page 5, there is discussion of [REDACTED] I wanted to confirm that this term itself doesn't refer to a proprietary material or process.

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To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>; Alex Economou <EconomouA@sbcapcd.org>
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Carly,

We have reviewed and we don't believe anything here would be proprietary. I do have a question about the review of this for CEQA. Should we need to phase in an increase in production and need to add additional BACT equipment to keep the emission levels down to what we proposed as a part of the project, how could we revise the project to include a future scale-up and subsequent BACT for emission control down to the levels proposed?

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Wed, Jan 4, 2023 at 3:10 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Good afternoon and Happy New Year Lindsay and Andriana,

The District had a meeting this morning with the environmental consultant (MRS) assisting us with CEQA review for ATC 15634. The District and MRS are preparing a data request for your review and attention. As we discussed the last time we spoke, we will be asking for further information to clarify your project's baseline and other project details.

We also wanted to provide the consultant with our estimation of the air emissions from your project, however we do not want to supply any information CCA deems confidential. I went through the attached spreadsheets and removed any reference to product names. General process description, usage, and percent capture/control remains. **Please carefully review the attached spreadsheets and let us know if there is anything that should be further redacted before we share with the consultant.**

Thank you,
Carly



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Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Carly,

We have reviewed and we don't believe anything here would be proprietary. I do have a question about the review of this for CEQA. Should we need to phase in an increase in production and need to add additional BACT equipment to keep the emission levels down to what we proposed as a part of the project, how could we revise the project to include a future scale-up and subsequent BACT for emission control down to the levels proposed?

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Wed, Jan 4, 2023 at 3:10 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Good afternoon and Happy New Year Lindsay and Andriana,

The District had a meeting this morning with the environmental consultant (MRS) assisting us with CEQA review for ATC 15634. The District and MRS are preparing a data request for your review and attention. As we discussed the last time we spoke, we will be asking for further information to clarify your project's baseline and other project details.

We also wanted to provide the consultant with our estimation of the air emissions from your project, however we do not want to supply any information CCA deems confidential. I went through the attached spreadsheets and removed any reference to product names. General process description, usage, and percent capture/control remains. **Please carefully review the attached spreadsheets and let us know if there is anything that should be further redacted before we share with the consultant.**

Thank you,
Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.979.8337

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From: [Lindsay Cokeley](#)
To: [Carly V. Barham](#)
Cc: [David I. Harris](#); [Alex Economou](#); [William S. Sarraf](#); [Matthew Allen](#)
Subject: Re: ATC 15634 - Data Request for CEQA Review
Date: Thursday, February 16, 2023 1:41:59 PM
Attachments: [2023.02.15 Project Description.pdf](#)
[2023.02.15 Project Description Redacted.pdf](#)
[Invoices Combined Redacted.pdf](#)
[Invoices Combined.pdf](#)
[Equipment Export 2 13 23 1051 \(Existing and Proposed\).pdf](#)
[Equipment Export 2 13 23 1051 \(Existing and Proposed\) Redacted.pdf](#)

Please see the response to this request below. I'm hoping to have the rest of the information compiled tomorrow and then I will be working on creating redacted versions.

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Thu, Feb 16, 2023 at 12:06 PM Lindsay Cokeley <lindsay@ccagriculture.com> wrote:

Okay - it would be a heavy lift to redact all the manual information again. We have submitted most of the manuals already through the ATC application process and those have redacted versions that were submitted as well. If there are specific pieces of equipment that you don't already have manuals and redacted versions can you please send me that list? It would save a lot of time and duplicate efforts.

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Thu, Feb 16, 2023 at 10:40 AM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Okay, thank you. We will delete the original email and await the submittal of two versions, one marked confidential and one redacted. It is the District's intention to keep all confidential information internal and only share the redacted versions with the environmental consultant. We will request that the consultant also delete the previously provided documents.

Also, William has requested either access to, or provision of, the manual and specification documents that are linked to a google drive folder in the equipment spreadsheet.

Best,

Carly



Carly Barham

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Tuesday, February 14, 2023 5:23 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>; Alex Economou <EconomouA@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>; Matthew Allen <matthew@ccagriculture.com>
Subject: Re: ATC 15634 - Data Request for CEQA Review

Hi Carly,

Yes - these documents are confidential. I will need to work on redacting them tomorrow and will resend them, along with the redacted version of the project description as well.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Tue, Feb 14, 2023 at 3:36 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Thank you for the submittal. We would like to clarify whether the documents provided contain confidential information. If so, we ask that you follow the District Policy and Procedure for Handling of Confidential Information: www.ourair.org/wp-content/uploads/6100-020-1.pdf and provide two versions of your responses: a confidential version and a redacted version absent confidential information. In the event the current submittal contains confidential information, we will delete your previous email and request that the environment consultant do the same.

Thank you,

Carly



Carly Barham

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BarhamC@sbcapcd.org

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From: Lindsay Cokeley <lindsay@ccagriculture.com>

Sent: Monday, February 13, 2023 6:02 PM

To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>; Alex Economou <EconomouA@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>; Greg Chittick <greg.chittick@mrsenv.com>; dean <dean.dusette@mrsenv.com>; nicole.trezza@mrsenv.com; Matthew Allen <matthew@ccagriculture.com>
Subject: Re: ATC 15634 - Data Request for CEQA Review

Hi Carly,

Please see the attached equipment list and solvent purchase records, please note that we recently adopted software that allows us to track all equipment and their components, and it's our understanding that not all of this equipment may be subject to a permit, however, it is included regardless, as it is much easier for us to track changes this way. We are refining the project description and are hoping to get that back to you no later than tomorrow.

Please advise if I also need to send a redacted version, in which case that might take me some time.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Fri, Jan 27, 2023 at 3:17 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Good afternoon Lindsay,

After coordination with the environmental consultant, we have prepared a comprehensive data request that will help facilitate the environmental review of your project. Our goal would be to have responses as soon as possible so that we can continue to move ahead with analysis of your project. We request that Item 1, 2, and 18 be addressed no later than Monday, February 13.

Please let me know if you have any questions. We'd be happy to set up a time to walk through any of these items and include the consultant as well.

Thank you,

Carly



Carly Barham

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BarhamC@sbcapcd.org

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From: [Lindsay Cokeley](#)
To: [Carly V. Barham](#)
Cc: [Matthew Allen](#)
Subject: Response to RFI
Date: Wednesday, February 22, 2023 2:57:11 PM
Attachments: [ATC 15624 Data Request - Response Letter.pdf](#)
[ATC 15624 Data Request - Response Letter - Redacted.pdf](#)
[23 - Data Request.pdf](#)
[34 - Building Use Approvals.pdf](#)
[17.35 - CDPH \[REDACTED\] Certificate.pdf](#)
[35 - Equipment \[REDACTED\] Report - Redacted.pdf](#)
[31.32 - Hazardous Materials Management Plan - Redacted.pdf](#)
[31.32 - Hazardous Materials Management Plan.pdf](#)
[35 - Equipment \[REDACTED\] Report - Confidential.pdf](#)

Hi Carly,

Please see the attached cover letter and associated attachments for the CEQA review. Any document attached that does not have a redacted copy is not considered confidential by CCA.

Thank you,



Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

ccagriculture.com



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ATC 15634 Data Request – 1/27/2023

Provide responses to the items below. If responses to any of the items below require the provision of confidential information, provide two versions of your responses: a confidential version and a redacted version absent confidential information. See District Policy and Procedure for Handling of Confidential Information: www.ourair.org/wp-content/uploads/6100-020-1.pdf.

Project Description/Project Site

1. Confirm the attached project description.

Please see the previously sent **Project Description**

2. Provide an existing and proposed equipment list for the facility. Note that the existing equipment list should include the currently installed and operating equipment as of January 2023. The proposed equipment list should include any and all equipment that you are requesting to be permitted as part of ATC 15634. Please identify which equipment is existing and which is proposed. The equipment list should also indicate the equipment size and volume, throughput and other pertinent characteristics.

Please see previously sent **Equipment List**

3. Business hours: *Peak: 24/7 or Regular: 24/5*
4. Number of employees: *There are a total of 244 personnel (161 CCA and 83 temporary employees) across 3 shifts*
5. Site acreage: *Chestnut: 1.09 Acres, Laurel: 1.14 Acres*
6. Square footage of the facility and all buildings: *Chestnut - Site: 47,480 SF Building: 17,820 SF Laurel - Site: 49,658 SF Building: 20,368 SF*
7. Number of vehicle parking spaces: *73*
8. Landscaping coverage (square footage): *Approximately 3% or 2,914 sf*
9. General Plan designation: *Industrial with Special Event Overlay*
10. Zoning: *Industrial with Special Event Overlay*
11. Surrounding uses/zoning: *The adjacent properties to the north and east are zoned Industrial (I), to the west are zoned Public Facilities (PF) and to the south are zoned Medium Density Residential (R2).*
12. Does the project involve grading or demolition? *No* If yes, please describe.
13. Are any trees or vegetation proposed for removal? *No*
14. Is the project site within one-quarter mile of a school? *No*

15. Is the project site in a FEMA flood hazard zone? Yes, Zone X .2% Annual Chance Flood Hazard

Permits/Approvals/Plans

16. What types of other permits, approvals, plans does your operation require in addition to State Licenses and City of Lompoc Commercial Cannabis Use License?

CDFW Weighmaster License, County of SB Weights and Measures Certificate of Registration, EPA ID Number, Hazardous Materials Permit (CUPA), Wastewater Discharge Permit

17. Provide copies of the facility's State Cannabis Licenses:

- a. CDPH-10003156
See attached CDPH License Certificate

Solvent Recordkeeping

18. In CCA's July 2022 response to District incompleteness items, annual solvent data for 2021 was provided in a table entitled "Solvent Purchase Receipt History, 7/13/2022". In the July 2022 response, CCA stated that its internal solvent tracking has been fine-tuned for concise reporting in accordance with permitting requirements and that CCA has worked diligently over the past year to rectify the web form and provide adequate training to authorized employees utilizing solvents. Provide all available solvent reporting from July 2022 (or earlier as available) to present. Data on at least a monthly basis is preferred if available. Include data to substantiate purchase and/or usage amounts, such as purchase receipts or other internal reporting/recordkeeping.

See the previously sent Solvent Invoices

19. The type of solvent is on the previously provided MSDS or SDS: provide updates if the solvent is anticipated to change with the project.

No updates to the solvent type.

20. Provide total amounts of solvent stored onsite.

| | |
|------------|------------|
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |

| | |
|------------|------------|
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |

[REDACTED]

21. Does the project require upgrades to the electrical system or installation of additional electrical power, such as a substation?

No

Hydrology/Water Quality

22. Would the project increase the impervious surfaces on-site?

No

23. What is the facility's water source? Public/municipal water, private well, share water system? Water provider and contact information was provided previously through 2021 approximately: please provide data through 2022.

No change to facility water source, still City of Lompoc Water (municipal). See attached 2022 water usage report.

24. Will your proposed project result in an increase in water use at the facility?

No

25. In the event of a flood at the facility, is there a risk of releasing pollutants due to project inundation or accidental release? Describe drainage system, containment systems and stormwater systems.

Most operations are closed-loop and/or gaseous in nature. One of the two buildings is recessed with a 6" containment curb. House drains run to city sewer, roofs and parking lots drain to city storm drains.

Wastewater

26. Will any industrial effluent (non-domestic wastewater) from the facility be discharged into the public sewer system?

Yes, dishwashing water from glassware cleaning, however, this has been approved by the local jurisdiction and is regulated through our Wastewater Discharge Permit.

Hazardous Waste

27. Does your facility generate hazardous waste? If yes, please describe what type of waste is generated, liquid, solid, or both.

Yes, both.

28. Will your proposed project result in an increase in liquid or solid waste disposal at the facility?

No

29. For liquid waste, submit verification from the Regional Water Quality Control Board that Waste Discharge Requirements apply or those exemptions from such requirements have been granted.

The RWQCB was contacted shortly after beginning operations to inquire about this. Their response was that since there was no SIC code for cannabis operations, then it would not be regulated by their Industrial Wastewater Discharge Permit. I have recently inquired again to determine if we can receive an NOC/NOE. We will update you when we hear back.

30. For solid waste, provide the following: Note that hazardous waste manifests were provided previously, but are difficult to read as a scanned version. Please provide a summary table of hazards waste shipments and type and date.

- a. Type and volume of wastes.
See table below for information gathered in 2022.
- b. Method and frequency of cleaning.
[REDACTED]
- c. Means of waste transport, including the transportation company for hazardous materials.
Third Party Haz Waste Hauler, GAIACA
- d. Description of short-term storage facilities.
Locked storage container with secondary containment
- e. Method and area of waste disposal.
At each satellite accumulation area there is a closed and locked 55-gal metal drum to collect solvent-contaminated gloves, rags, and towels.

31. Do you have a manufacturing solid waste management plan and/or a hazardous material business plan? Provide copies.

See attached **Hazardous Materials Management Plan**

32. Are the operators of the facility required to submit a hazardous waste management plan to the Manufacturing Cannabis Safety Branch of the California Department of Public Health? If so, please provide or provide a basis for an exemption.

The Manufacturing Cannabis Safety Branch of the California Department of Public Health is no longer the name of the agency that regulates cannabis manufacturing operations. The agency was consolidated into the larger Department of Cannabis Control (DCC). The DCC requires operators to maintain a written waste management policy for cannabis waste. Please advise on what information is being requested, and whether it pertains to hazardous waste or cannabis waste. Hazardous waste procedures are currently covered by the attached **Hazardous Materials Management Plan**.

33. Will the project be required to prepare a pest management plan to comply with California Code of Regulations Section 8106(a)(3)? If so, please provide or provide a basis for an exemption.

The CCR Section 8106 was originally part of the CDFA cannabis regulations. As previously mentioned the CDFA Cannabis Agency was consolidated into the DCC, and this regulation no longer exists. There is an equivalent regulation in the new consolidated regs (Section 16310) that only applies to cannabis cultivators. This facility is not a cannabis cultivation facility and therefore this regulation does not apply.

34. Will use of volatile and non-volatile extraction processes be approved by the City Building and Fire Department? If so, please provide approval or a basis for exemption. Has the facility been inspected by the Fire Department? Provide inspection reports and Fire Department contact information. Describe fire protection and detection measures installed onsite currently and proposed as part of the project, including flammable gas detection, sprinkler systems, alarms, notification systems, audible and visible systems.

City of Lompoc CCU license allows for a Type 7 volatile extraction license, in addition to the building certificate of occupancy which are attached. There are automatic fire sprinkler systems installed throughout the facility, as well as LEL and O2 sensors with audible and visible notification systems.

Contact: Dena Paschke
d_paschke@ci.lompoc.ca.us
805.875.8063

35. Please provide a manufacturing license from the California Department of Public Health documenting engineering certification for the extraction system, or provide a basis for exemption.

Please see the attached **Manufacturing license** for this facility. Please also see the attached **engineering certification** for the extraction system.

Wildfire

36. Do you have adequate fire protection water supplies capable of supplying the required fire flow for fire protection? Provide information on the closest fire hydrant.

Fire hydrant centrally located on the site.

37. Do you have adequate apparatus access for all facilities and structures?

Yes

38. Do you have an operational permit from the fire department?

Yes

39. Are fire sprinklers provided as required per Building, Fire, and/or City codes?

Yes

Transportation

40. Provide levels of traffic by time of day: daytime, evening, nighttime.

Traffic is moderate to heavy during the hours of 7am-5pm and light to moderate between 5pm-7am.

41. What are the routes of ingress and egress from the site on to area roadways and highways?

Vehicle ingress to the facility is through a single gate from the south via Chestnut Ave,. Vehicle egress from the facility is via 2 separate gates, with one gate being on the east side of the northernmost building and the other on the west side. Both egress gates are one way traffic to Laurel Ave. There are 2 pedestrian gates, one on Chestnut Ave and the other on Laurel Ave.

Other Items

42. Would the project produce changes to the aesthetics of the exterior of the building, such as additions that could increase the height or size of the building, etc. Would lighting be added to the exterior of the building? Provide specifics if so.

No

43. Would the project involve construction and, if so, what levels of vehicle trips would be required to deliver construction materials and equipment to and from the site. Would any grading be required and, if so, provide specifics?

No

44. Have the current or historical operations ever produced complaints from neighbors for noise, odors or any other issue? If so, please explain.

There were odor complaints in 2020 with tracking and new systems installed. City manager declared the issue solved to his satisfaction 1/5/21.

45. Have the current or historical operations ever caused a release of materials to the environment? If so, please explain.

No

46. What current or historical measures are in place to minimize odor and air quality impacts to the area neighbors?

A series of filtration and capture systems were installed through 2020 to address odor emissions.

47. What noise sources are present at the site currently and would be added to the site as part of the project, such as generators, HVAC, exhaust fans, alarms, etc.?

Please describe the equipment and the periods of time when they may be operating. Storage Containers, Alarm System, Generator, Pressure Relief Valves, Compressors

48. How will carbon canister systems be monitored for replacement? Please describe if there is a monitoring system or if they are replaced on a periodic basis routinely?

The filtration cartridge systems in place are changed on a periodic basis and scheduled by known emission quantity and capture capacity.

|

From: [Carly V. Barham](#)
To: [Lindsay Cokeley](#)
Subject: RE: Response to RFI
Date: Thursday, February 23, 2023 3:49:00 PM
Attachments: [Public ATC 15634 - Emission Calculations - 8-1-2022.xlsx](#)

Hi Lindsay,

Since there was some discussion of increasing CCA's operations beyond what's been currently applied for, we wanted to confirm that the proposed daily and annual usage we have calculated in the attached spreadsheet remains accurate.

Lastly, we appreciate the invoices for the solvent purchases from July 2022-Jan 2023. In previous submittals you had supplied the annual usage totals for 2019-2021 which were [REDACTED] 2019, [REDACTED] lb/yr 2020, [REDACTED] lbs/yr 2021. Do you have the total for 2022?

Thank you,



Carly Barham

Planning Division
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BarhamC@sbcapcd.org
805.979.8337

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From: Carly V. Barham
Sent: Thursday, February 23, 2023 10:20 AM
To: Lindsay Cokeley <lindsay@ccagriculture.com>
Cc: Matthew Allen <matthew@ccagriculture.com>
Subject: RE: Response to RFI

Good morning Lindsay,

Thank you, received. We appreciate your time and attention to this data request. We will review internally, in consultation with the environmental consultant, and circle back with you as soon as possible to discuss our assessment of the environmental review requirements for your project in light of the information and records you have provided.

Sincerely,
Carly



Carly Barham

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BarhamC@sbcapcd.org
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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Wednesday, February 22, 2023 2:53 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: Matthew Allen <matthew@ccagriculture.com>
Subject: Response to RFI

Hi Carly,

Please see the attached cover letter and associated attachments for the CEQA review. Any document attached that does not have a redacted copy is not considered confidential by CCA.

Thank you,



Lindsay Cokeley
Director, Compliance | CCA
(818) 317-8414
ccagriculture.com



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From: [Lindsay Cokeley](#)
To: [Carly V. Barham](#)
Subject: Re: Response to RFI
Date: Tuesday, February 28, 2023 12:58:25 PM

Hi Carly,

We have included all the equipment (including additional emission control equipment) that would be needed should we need to expand operations as a part of the permit. We are working to get new proposed daily and annual usage, however, the control technology will likely have to change should we increase annual usage, and therefore we do not have numbers to input into columns 3-6 at this time. We are hoping to have the CEQA analysis done to permit up to 240 lbs/day of ROC in order to avoid the need for ERCs in this phased approach. Let me know what your thoughts are on this.

Additionally, our solvent tracking data for last year shows a total of 114,660 lbs of extraction solvent used in 2022.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Thu, Feb 23, 2023 at 3:49 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Since there was some discussion of increasing CCA's operations beyond what's been currently applied for, we wanted to confirm that the proposed daily and annual usage we have calculated in the attached spreadsheet remains accurate.

Lastly, we appreciate the invoices for the solvent purchases from July 2022-Jan 2023. In previous submittals you had supplied the annual usage totals for 2019-2021 which were [REDACTED] 2019, [REDACTED] 2020, [REDACTED] 2021. Do you have the total for 2022?

Thank you,



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From: Carly V. Barham
Sent: Thursday, February 23, 2023 10:20 AM
To: Lindsay Cokeley <lindsay@ccagriculture.com>
Cc: Matthew Allen <matthew@ccagriculture.com>
Subject: RE: Response to RFI

Good morning Lindsay,

Thank you, received. We appreciate your time and attention to this data request. We will review internally, in consultation with the environmental consultant, and circle back with you as soon as possible to discuss our assessment of the environmental review requirements for your project in light of the information and records you have provided.

Sincerely,

Carly



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Santa Barbara County

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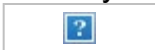
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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Wednesday, February 22, 2023 2:53 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: Matthew Allen <matthew@ccagriculture.com>
Subject: Response to RFI

Hi Carly,

Please see the attached cover letter and associated attachments for the CEQA review. Any document attached that does not have a redacted copy is not considered confidential by CCA.

Thank you,



Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

ccagriculture.com



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|

From: [Carly V. Barham](#)
To: [Lindsay Cokeley](#)
Cc: [David I. Harris](#); [William S. Sarraf](#); [Kaitlin E. McNally](#); [Alex Economou](#)
Subject: RE: Response to RFI
Date: Thursday, March 23, 2023 4:39:25 PM

Good afternoon Lindsay,

We received comments from MRS after review of CCA's 02-22-23 responses to our 01-27-23 data request. Please address the comments below. If any of the below items would be easier to talk through, we can set up a meeting to include MRS and dive into the items as needed. A response at your earliest convenience is requested, preferably by April 7 if feasible.

Comments (# indicates data request number):

1. #16: HMMP describes a Spill Prevention and Response Plan and an Emergency Action Plan. Please provide copies of these.
2. #16: HMMP describes incorporation of the HMBP, but no details are included. Some may be redacted. Please provide the HMBP, and letters from fire department and most recent fire department inspection reports confirming that the Fire Department has approved the HMBP and has inspected the facilities with no outstanding violations or recommendations.
3. #18: Solvent invoices indicate only invoices from July 2022 to January 2023. Some of these may be repetitive invoices, but the totals do not seem to match the indicated [REDACTED] lbs total delivered in 2022. For example, during the July-Jan timeframe, about [REDACTED] cylinders of [REDACTED] were delivered, totaling about [REDACTED] lbs and [REDACTED] cylinders of [REDACTED] were delivered totaling [REDACTED] lbs. Please provide clarification on the total amounts delivered in 2022.
4. #20: provide at least the category and classification of the materials, such as flammable class.
5. #28: describe how an increase in processing will not generate an increase in waste.
6. #29: CCA still owes additional information on RWQCB requirements.
7. #29: provide units of sum of quantity (gallons or pounds?) and frequency of removal/generation (pounds per year, for example).
8. #32: information on both hazardous waste and cannabis waste is needed. Quantities of hazardous waste are listed in #29. Please also provide quantities of cannabis waste and frequency (tons per year?).
9. #34: Provide information documenting that the fire department has inspected the facility and the facility is in compliance with fire department requirements and the HMBP requirements.
10. #34: no indication is shown that LEL and O2 sensors and alarms are installed on the inspection card. Please provide clarification and more details on detection and alarm systems. For example, if LEL exceedance is detected, what measures are taken to reduce the LEL in the building to prevent an explosion? Are there high-volume exhaust systems, for example, that would be automatically activated to ensure LEL are not exceeded?
11. #35: provide documentation that the seismic anchoring as required has been installed.
12. #38: provide the documentation of HMBP acceptance and inspections.
13. #44: Provide documentation on the 2020 complaints and the City manager issue resolution.
14. #47 does not seem to provide any information on existing and planned noise sources, particularly during the periods when the facility will be operating 24/7.

Thank you,
Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.979.8337
Out of office Wednesdays

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Thursday, March 16, 2023 4:19 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>; Kaitlin E. McNally <McNallyK@sbcapcd.org>; Alex Economou <EconomouA@sbcapcd.org>
Subject: Re: Response to RFI

Thank you for this update Carly.

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Thu, Mar 16, 2023 at 3:50 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

The consultant is reviewing the information submitted as it relates to establishment of baseline as that information will be relevant regardless of the scope of the project CCA decides to pursue after review of the Compliance Agreement.

Carly

From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Thursday, March 16, 2023 3:31 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>; Kaitlin E. McNally <McNallyK@sbcapcd.org>; Alex Economou <EconomouA@sbcapcd.org>

Subject: Re: Response to RFI

Thanks, Carly, I did see the email from Kaitlyn. Does this mean that the consultant has stopped reviewing the documentation we provided a few weeks ago as it pertains to other parts of the CEQA review that are not related to air resources?

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Thu, Mar 16, 2023 at 3:27 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

As indicated in separate correspondence from Kaitlin, the District advises that we circle back on CEQA next steps after CCA has the opportunity to review the draft Compliance Agreement that is forthcoming.

Sincerely,
Carly



Carly Barham

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From: Lindsay Cokeley <lindsay@ccagriculture.com>

Sent: Thursday, March 16, 2023 9:08 AM

To: Carly V. Barham <BarhamC@sbcapcd.org>

Cc: David I. Harris <HarrisD@sbcapcd.org>; William S. Sarraf <[SarrafW@sbcapcd.org](mailto:Sarrafw@sbcapcd.org)>

Subject: Re: Response to RFI

Hi Carly,

I am just checking in on this to see if you have been able to discuss our project internally to see

what our path forward is. Let me know what our next step should be.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Thu, Mar 2, 2023 at 4:34 PM Lindsay Cokeley <lindsay@ccagriculture.com> wrote:

Thanks Carly,

We are getting more information every day with our solvent recovery efforts that is showing we may be able to get under the proposed 120lbs per day with different technology, however, I want to make sure we are covered in case we need to increase production.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Thu, Mar 2, 2023 at 4:28 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Okay, information received. A revised project that increases usage beyond what's currently been applied for and potential emissions up to 240 lb/day does change things and we will need to discuss internally before providing more feedback and direction. We will get back to you as soon as possible.

Best,
Carly



Carly Barham

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Tuesday, February 28, 2023 12:58 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Subject: Re: Response to RFI

Hi Carly,

We have included all the equipment (including additional emission control equipment) that would be needed should we need to expand operations as a part of the permit. We are working to get new proposed daily and annual usage, however, the control technology will likely have to change should we increase annual usage, and therefore we do not have numbers to input into columns 3-6 at this time. We are hoping to have the CEQA analysis done to permit up to 240 lbs/day of ROC in order to avoid the need for ERCs in this phased approach. Let me know what your thoughts are on this.

Additionally, our solvent tracking data for last year shows a total of 114,660 lbs of extraction solvent used in 2022.

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Thu, Feb 23, 2023 at 3:49 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Since there was some discussion of increasing CCA's operations beyond what's been currently applied for, we wanted to confirm that the proposed daily and annual usage we have calculated in the attached spreadsheet remains accurate.

Lastly, we appreciate the invoices for the solvent purchases from July 2022-Jan 2023. In previous submittals you had supplied the annual usage totals for 2019-2021 which were [REDACTED] 2019, [REDACTED] 2020, [REDACTED] 2021. Do you have the total for 2022?

Thank you,



Carly Barham

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From: Carly V. Barham
Sent: Thursday, February 23, 2023 10:20 AM
To: Lindsay Cokeley <lindsay@ccagriculture.com>
Cc: Matthew Allen <matthew@ccagriculture.com>
Subject: RE: Response to RFI

Good morning Lindsay,

Thank you, received. We appreciate your time and attention to this data request. We will review internally, in consultation with the environmental consultant, and circle back with you as soon as possible to discuss our assessment of the environmental review requirements for your project in light of the information and records you have provided.

Sincerely,
Carly



Carly Barham

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BarhamC@sbcapcd.org
805.979.8337

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Wednesday, February 22, 2023 2:53 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: Matthew Allen <matthew@ccagriculture.com>
Subject: Response to RFI

Hi Carly,

Please see the attached cover letter and associated attachments for the CEQA review. Any document attached that does not have a redacted copy is not considered confidential by CCA.

Thank you,



Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

ccagriculture.com



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From: [Kaitlin E. McNally](#)
To: [Lindsay Cokeley](#)
Cc: [David I. Harris](#); [William S. Sarraf](#); [Carly V. Barham](#)
Subject: RE: ATC 15634 - Confirmation of Public Emission Calculations
Date: Friday, March 24, 2023 9:52:42 AM
Attachments: [2023-03-24 DRAFT Compliance Agreement.docx](#)

Good Afternoon Lindsay,

Attached please find the draft Compliance Agreement for your review. Please respond with any questions or requested changes at your earliest convenience and no later than Monday, April 10.

Please note that this Compliance Agreement assumes CCA will move forward with the project as specified in the complete application for ATC 15634, and that the project is exempt from CEQA. However, the District has not been able to make this CEQA determination yet, based on the information CCA has provided to date – more information is needed from CCA. Lastly, I want to point out that this Compliance Agreement does not include willful and intentional penalties (up to \$75,000 per day) for NOVs 12987, 12988, 12989, and 12990, even though these violations are considered willful and intentional and would normally be subject to these additional penalties.

The District is willing to enter this Compliance Agreement, which includes greatly reduced penalties, because it specifies a relatively expeditious timeframe for achieving compliance. If CCA is not interested in entertaining this Compliance Agreement and reaching compliance with the District's rules and regulations in an expeditious fashion, the District would instead need to evaluate other enforcement options including seeking an abatement order. If granted by the Hearing Board, an abatement order would require CCA to take specific actions or shut down its operations until compliance is achieved; a severe remedy reserved for serious violators.

If CCA decides to proceed with a revised project description instead of the current application for ATC 15634, due to the expanded CEQA evaluation necessary for this option we would expect an additional 1-2 years before CCA achieves compliance. In this scenario, the District would not enter into a Compliance Agreement and the penalties would be on a much higher scale (at least 10 times higher than the penalties included in the attached Compliance Agreement). The penalties would be higher due to the additional amount of time CCA would be in violation and because willful and intentional penalties would be included.

If you'd like to reach out to me, I will be on vacation all next week, but I will be available after I return on April 3. Have a nice weekend.

Best regards,

Kaitlin



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

McNallyK@sbcapcd.org
805.979.8298

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From: Kaitlin E. McNally
Sent: Thursday, March 16, 2023 2:09 PM
To: Lindsay Cokeley <lindsay@ccagriculture.com>
Cc: David I. Harris <HarrisD@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>; Carly V. Barham <BarhamC@sbcapcd.org>
Subject: RE: ATC 15634 - Confirmation of Public Emission Calculations

Hi Lindsay,

We've had a chance to discuss internally. Before you put too much work into revising the project description, we thought it would be helpful to provide you with the draft Compliance Agreement we've been working on. This Compliance Agreement is based on the current project description included in the complete application for ATC 15634. We plan on getting you this draft by the end of next week.

Best regards,

Kaitlin



Kaitlin McNally

Compliance Division Manager
Air Pollution Control District
Santa Barbara County

McNallyK@sbcapcd.org
805.979.8298

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From: Kaitlin E. McNally
Sent: Friday, March 3, 2023 4:20 PM
To: Lindsay Cokeley <lindsay@ccagriculture.com>
Cc: David I. Harris <HarrisD@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>; Carly V. Barham <BarhamC@sbcapcd.org>
Subject: RE: ATC 15634 - Confirmation of Public Emission Calculations

Hello Lindsay,

The email you sent Carly on 2/28 with a revised project that increases usage beyond what's currently been applied for and potential emissions up to 240 lb/day also drastically changes the Compliance Agreement that we have been working on. Therefore, I'm not able to give you timeline right now. We'll need to discuss internally and we will get back to you as soon as possible.

Best regards,

Kaitlin



Kaitlin McNally

Compliance Division Manager
Air Pollution Control District
Santa Barbara County

McNallyK@sbcapcd.org
805.979.8298

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From: Lindsay Cokeley <lindsay@ccagriculture.com>

Sent: Friday, March 3, 2023 3:45 PM

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

Cc: David I. Harris <HarrisD@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>; Carly V. Barham <BarhamC@sbcapcd.org>

Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Kaitlin,

Can you let me know if we are still going to be receiving a compliance agreement, and what the timeline looks like?

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Fri, Feb 10, 2023 at 1:57 PM Kaitlin E. McNally <McNallyK@sbcapcd.org> wrote:

Hello Lindsay,

I apologize for taking so long to get back to you. In regards to your decision about what project to pursue, you should take into consideration that CCA's manufacturing facility located at 1201 W

Chestnut in Lompoc is currently and will continue to be in violation until the final APCD permit is issued. Furthermore, each and every day is considered a separate violation and is subject to additional daily penalties. Therefore, from a compliance perspective, it is in CCA's best interest to get a final permit as soon as possible. I hope this information is helpful.

Best regards,

Kaitlin



Kaitlin McNally

Compliance Division Manager
Air Pollution Control District
Santa Barbara County

McNallyK@sbcapcd.org
805.979.8298

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Tuesday, January 31, 2023 4:48 PM
To: Kaitlin E. McNally <McNallyK@sbcapcd.org>
Subject: Fwd: ATC 15634 - Confirmation of Public Emission Calculations

Hi Kaitlyn,

Carly is looking for us to have a final project description for her as soon as possible in order to keep the CEQA review going. We discussed with her and David last week that we may want to include expanded operations in the CEQA review as a phased project, but obviously if we are still incurring daily violations, we may need to pursue the current project and then immediately turn around to do the expansion CEQA review. Carly recommended that we wrap it all in one since the consultant has already been selected and is reviewing the project as it is, so it would be much simpler to review the entire project and then phase in the expansion as a part of a future ATC modification and not have to have environmental review each time.

That being said, she mentioned last week that you would get back to us shortly, and I know you had also mentioned we would be receiving a compliance agreement a couple weeks ago. I'm wondering if you can give us another status update.

Thank you,
Lindsay Cokeley

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

From: **Carly V. Barham** <BarhamC@sbcapcd.org>

Date: Thu, Jan 26, 2023 at 3:39 PM

Subject: RE: ATC 15634 - Confirmation of Public Emission Calculations

To: Lindsay Cokeley <lindsay@ccagriculture.com>

Cc: David I. Harris <HarrisD@sbcapcd.org>, Kaitlin E. McNally <McNallyK@sbcapcd.org>

Hi Lindsay,

The proposed equipment could either be limited to what you are applying to permit under ATC 15634 or it could be what you foresee using in support of an expanded, future operation.

A couple considerations that we discussed recently.

1. If you would like us to analyze a larger-scale project than what you are permitting under ATC 15634, this will very likely require the preparation of an MND or EIR.
2. Analysis of future expansion plans may give you the ability to “tier” future permit requests for additional equipment/operations from the analysis. Meaning that although future ATC permits will require CEQA review, the determination could be made that the scope of the proposed project is covered by an existing MND/EIR and therefore no further CEQA review is required.
3. If proposed operations in the future are too speculative, we may have trouble defining the project and adequately analyzing the potential impacts. If you go through the effort of analyzing a larger project upfront, you will want to consider how confident you are that the analysis would likely cover your future actions and expansion plans. Otherwise, you may get into a situation of having to do project-specific environmental review again for future permit requests, if the scope of the request does not fall into the MND/EIR that the District prepares now.

We also discussed some other considerations that may be at play here, including your compliance status and your ability to establish an environmental/emissions baseline for solvent usage that may provide support for considering your current permit request (as identified in ATC 15634) as exempt from CEQA.

I believe Kaitlin should be following up with you shortly with respect to whether CCA is still incurring NOVs post-application completeness.

Happy to talk through any of this as you consider the path forward.

Sincerely,
Carly



Carly Barham

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Wednesday, January 25, 2023 4:54 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Carly,

Regarding the "proposed" equipment - does it make sense for us to list equipment that we may not ever purchase but is simply being explored by our R&D team?

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Fri, Jan 20, 2023 at 10:26 AM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

As we discussed, here are a few items in the forthcoming coming data request that it would be beneficial to respond to as soon as possible.

1. In CCA’s July 2022 response to District incompleteness items, CCA stated that its internal solvent tracking has been fine-tuned for concise reporting in accordance with permitting requirements and that CCA has worked diligently over the past year to rectify the web form and provide adequate training to authorized employees utilizing solvents. Provide all available solvent reporting from July 2022 (or earlier as available) to present. As available, solvent report should include volumes stored, used, delivered and/or transferred as well as type and MSDS or SDS. Provide purchase receipts, other recordkeeping and/or corroborating information for volumes used as available.

2. Provide an existing and proposed equipment list for the facility absent any confidential information. Note that the existing equipment list should include the currently installed and operating equipment as of January 2023. The proposed equipment list should include any and all equipment that you are requesting to be permitted as part of ATC 15634. Please identify which equipment is existing and which is proposed. The equipment list should also indicate the equipment size, throughput and other pertinent characteristics.

Please let me know if you have any questions.

Thanks,
Carly



Carly Barham

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Wednesday, January 18, 2023 10:51 AM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Carly and David,

I can do this Friday at 9:30am.

Thank you,
Lindsay Cokeley
Director, Compliance | CCA

On Tue, Jan 17, 2023 at 5:03 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

After discussing with David, I think it would be good to have a short call to walk through different options and get a little more information from CCA on potential project phasing and production increases. We are free this Thursday, 1/19 from 9:00-10:30, and Friday, 1/20 from 9:00-11:00. Do you have any availability during these windows?

Thanks,
Carly

From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Tuesday, January 17, 2023 12:24 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Thanks Carly.

Thank you,
Lindsay Cokeley
Director, Compliance | CCA

On Tue, Jan 17, 2023 at 11:00 AM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

I can just eliminate that page from the materials that we will be providing the environmental consultant. No need to follow-up on your end. I'll discuss this David this afternoon and get back to you either today or Thursday morning.

Thanks,
Carly



Carly Barham

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BarhamC@sbcapcd.org

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Tuesday, January 17, 2023 10:50 AM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Carly,

If the terminology used can be "extraction solvent", that would be better. Let me know if we need to change this on our end. Also, should I follow up directly with David on my question or wait to hear back from you?

Thank you,
Lindsay Cokeley
Director, Compliance | CCA

On Tue, Jan 17, 2023 at 10:36 AM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Thanks for the confirmation of the emission calculations. I'm going to consult with David regarding your questions about BACT implementation and I'll get back to you soon.

One other thing I wanted to confirm. I was looking through your redacted incompleteness response from July 13, 2022 ("ATC15634Response07132022_FullPackage_Redacted.pdf"), I noticed that on page 5, there is discussion of [REDACTED] I wanted to confirm that this term itself doesn't refer to a proprietary material or process.

Thanks,
Carly



Carly Barham

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Wednesday, January 11, 2023 11:55 AM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>; Alex Economou <EconomouA@sbcapcd.org>
Subject: Re: ATC 15634 - Confirmation of Public Emission Calculations

Hi Carly,

We have reviewed and we don't believe anything here would be proprietary. I do have a question about the review of this for CEQA. Should we need to phase in an increase in production and need to add additional BACT equipment to keep the emission levels down to what we proposed as a part of the project, how could we revise the project to include a future scale-up and subsequent BACT for emission control down to the levels proposed?

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Wed, Jan 4, 2023 at 3:10 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Good afternoon and Happy New Year Lindsay and Andriana,

The District had a meeting this morning with the environmental consultant (MRS) assisting us with CEQA review for ATC 15634. The District and MRS are preparing a data request for your review and attention. As we discussed the last time we spoke, we will be asking for further information to clarify your project's baseline and other project details.

We also wanted to provide the consultant with our estimation of the air emissions from your project, however we do not want to supply any information CCA deems confidential. I went through the attached spreadsheets and removed any reference to product names. General process description, usage, and percent capture/control remains. **Please carefully review the attached spreadsheets and let us know if there is anything that should be further redacted before we share with the consultant.**

Thank you,
Carly

Carly Barham
Planning Division



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DRAFT

**SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT
&
CENTRAL COAST AGRICULTURE – 1201 W CHESTNUT AVE
COMPLIANCE AGREEMENT**

I, the undersigned, on behalf of Central Coast Agriculture – 1201 W Chestnut Ave, hereby admit and agree to the conditions set forth below.

Compliance Agreement Effective Date: TBD when fully executed by the Parties

Compliance Agreement Termination Date: December 31, 2023

Responsible Official: John DeFriel

Email: john@ccagriculture.com

Owners/Operators: Central Coast Agriculture

Facility Name: Central Coast Agriculture – 1201 W. Chestnut Avenue
(FID 11664)

1. Factual Basis of Compliance Agreement:

- a. Central Coast Agriculture, hereafter referred to as “CCA”, admits and agrees that the cannabis product manufacturing, volatile extraction, storage and distribution facility at 1201 W. Chestnut Avenue in Lompoc, CA is subject to California Health and Safety Code Section 42300 and Santa Barbara County Air Pollution Control District Rule 201 (Permits Required).
- b. CCA admits and agrees that Santa Barbara County Air Pollution Control District Rule 201 was violated, and continues to be violated, by installing and operating a cannabis product manufacturing, volatile extraction, storage, and distribution facility at 1201 W. Chestnut Avenue in Lompoc, CA without final issued permits.
- c. The Santa Barbara County Air Pollution Control District, hereafter referred to as the “District”, and CCA enter into this Compliance Agreement to address the continuing violations of District Rule 201, on or after November 1, 2019, for their unpermitted operations at the facility location identified in this Compliance Agreement. The District has documented this non-compliance with the issuance of Notices of Violations (NOVs) 12587, 12987, 12988, 12989, and 12990. Each day or portion of a day in which the violation exists is considered a separate violation and such violations continue to accrue during the term of this Compliance Agreement.

- d. During the effective period of this Compliance Agreement the District agrees not to take any further enforcement action, beyond that specified in this Compliance Agreement, regarding NOV's 12587, 12987, 12988, 12989, and 12990. In the event CCA fails to comply with the terms and conditions of this Compliance Agreement, the District may take further action to enforce the terms and conditions of this Compliance Agreement. In the event the District is required to take action to enforce the terms and conditions of this Compliance Agreement, the District shall be entitled to recover all costs and fees, including its reasonable attorney's fees.
- e. If compliance is not attained by any of the timelines, or District-approved extensions, specified in Condition 3 and/or the Compliance Agreement Termination date, the District may initiate all available enforcement remedies.

2. Prior Actions:

- a. On October 7, 2020, a District inspector discovered a cannabis product manufacturing, volatile extraction, storage and distribution facility installed and operated without a District permit at 1201 W. Chestnut Avenue in Lompoc, CA.
- b. On October 26, 2020 NOV 12587 was issued for a violation of District Rule 201 for installing and operating a cannabis product manufacturing, volatile extraction, storage and distribution facility without a District permit at 1201 W. Chestnut Avenue in Lompoc, CA.
- c. On November 23, 2020, CCA submitted a permit application (ATC 15634) for the installation and operation of a cannabis product manufacturing, volatile extraction, storage and distribution operation.
- d. On December 22, 2020, the District deemed the application for ATC 15634 incomplete.
- e. CCA provided additional information to address incompleteness items for the ATC 15634 application on February 10, 2021, October 5, 2021, December 2, 2021, April 25, 2022, and July 13, 2022.
- f. On August 12, 2022, the District deemed the application for ATC 15634 complete and the CEQA review commenced.
- g. On September 23, 2022, the District notified CCA (via letter) that the District anticipates a Mitigated Negative Declaration (MND) is required for their project and that an outside consultant will be contracted to prepare the MND.
- h. On October 21, 2022, the District notified CCA (via letter) regarding potential CEQA requirements and that the District intended to hire *MRS, Environmental* as the environmental consultant and presented the scope of work for CCA comment.
- i. On October 25, 2022, CCA and the District met to discuss the CEQA project description (William Sarraf, Agnieszka Letts, Carly Barham, Andriana Villalpando, Lindsay Cokeley, Carlos Ortuno).
- j. On November 1, 2022, CCA responded to the District and accepted *MRS, Environmental* as the environmental consultant.

- k. On December 12, 2022, MRS contract with the District was signed.
- l. On January 4, 2023, the District and MRS had a CEQA Kick-Off Meeting.
- m. On January 27, 2023, the District submitted a formal CEQA data request to CCA.
- n. On February 16, 2023 and February 22, 2023, CCA provided responses to the January 27, 2023 data request. Based on the additional information provided by CCA, the District is now evaluating whether the project is exempt from CEQA.
- o. On February 23, 2023, the District submitted questions to CCA to clarify the project description.

3. Conditions of Compliance Agreement:

- a. CCA and the District agree to settle NOVs 12587, 12987, 12988, 12989, and 12990 by executing this Compliance Agreement and CCA fulfilling the terms and conditions herein, including full and timely payments of the agreed penalty amounts.
- b. With the exception of the equipment identified in NOVs 12587, 12987, 12988, 12989, 12990, CCA agrees not to bring onsite, install, or operate any additional equipment at this location prior to obtaining District permits. Failure to comply with this condition shall be considered a willful and intentional emissions violation, subject to additional civil penalties.
- c. CCA agrees to pay the “Final Signed Compliance Agreement” on-time penalty amount identified in Attachment A by **April 21, 2023**.
- d. CCA agrees to provide monthly updates on the status of compliance by the close of business **on the 1st day of each month**. If the 1st day of the month falls on a weekend or holiday, the monthly update is due by the close of business on the following business day. These updates shall include documentation of all accomplishments since the prior monthly update and the schedules and progress on the next steps. The updates shall also discuss any District-approved extensions to the timelines included herein. The updates shall be provided to the Compliance Division at enfr@sbcapcd.org. The first monthly update is due to the District on May 1st.
- e. CCA agrees to respond to District requests for additional information needed to complete the CEQA environmental review **within 21 calendar days** of each request.
- f. CCA agrees to pay the “CEQA Determination Notification” on-time penalty amount identified in Attachment A **within 7 calendar days** of notification from the District of the CEQA determination.
- g. CCA agrees to provide written comments on draft ATC 15634, if any, **within 21 calendar days** of the draft permit issuance date.

- h. CCA agrees to install and operate all emission control equipment required by final ATC 15634 **within 60 calendar days** of the final permit issuance date.

CCA agrees to provide written notification to the District by email to enfr@sbcapcd.org no later than 1 business day after all emission control equipment are installed and operational, to arrange for District inspection.

If the District concurs that CCA installed and operated all emission control equipment required by final ATC 15634 within 60 calendar days of the final permit issuance date, CCA agrees to pay the “Emission Controls Deadline” on-time penalty amount identified in Attachment A.

If CCA does not install and operate all emission control equipment required by final ATC 15634 within 60 calendar days of the final permit issuance date to the satisfaction of the District, CCA agrees to pay the “Emission Controls Deadline” late penalty amount identified in Attachment A.

CCA agrees to pay the applicable “Emission Controls Deadline” penalty identified in Attachment A within 7 calendar days of the date all emission controls are installed and operational, as confirmed by the District.

- i. CCA agrees to comply with all Source Compliance Demonstration Period conditions in ATC 15634 by the deadlines indicated in those conditions.
- j. **By December 31, 2023**, CCA agrees to submit a complete Permit to Operate (PTO) application for permit number 15634, as determined by the District and documented with a District permit completeness letter. This complete application will document the successful installation and operation of the District-approved emission control equipment at the facility and the end of this Compliance Agreement. Please note that District rules allow for 30 days to review applications for completeness. Therefore, please submit the initial application on or before December 1, 2023.

If CCA receives a District completeness letter for the PTO 15634 application by December 31, 2023, CCA agrees to pay the “Complete PTO Application Deadline” on-time penalty amount identified in Attachment A.

If CCA does not receive a District completeness letter for the PTO 15634 application by December 31, 2023, CCA agrees to pay the “Complete PTO Application Deadline” late penalty amount identified in Attachment A.

CCA agrees to pay the applicable “Complete PTO Application Deadline” penalty identified in Attachment A within 7 calendar days of the date of the District completeness letter for the PTO 15634 application.

- k. Extension of the timelines within this Compliance Agreement, including the Compliance Agreement Termination Date, may be granted upon the written approval by the District. CCA agrees to submit extension requests in writing for District review and approval, at least 7 calendar days prior to the due date. The request shall include the proposed revised due date(s) as well as the basis for the extension.

Any District-approved extension of a timeline specified in Conditions 3.h or 3.j shall result in CCA being ineligible for the On-Time Penalty Amount for the associated Penalty Description as outlined in Appendix A.

4. Payment:

- a. CCA agrees to pay the penalties in the amounts indicated in Attachment A by check or money order. Each payment is due on the date specified in Attachment A and shall be made payable to "Santa Barbara County Air Pollution Control District." Written notification shall be provided with each penalty payment and specify that payment is for "CCA Compliance Agreement".
- b. CCA waives any and all right to object to or to appeal the basis of the penalty that is the subject of this Compliance Agreement.
- c. In the event CCA fails to make payment by the dates specified within Attachment A, the District may take action to enforce the terms and conditions of this Compliance Agreement. In the event the District is required to take action to enforce the terms and conditions of this Compliance Agreement, the District shall be entitled to recover all costs and fees, including its reasonable attorney's fees from CCA. If compliance is not attained by the Compliance Agreement Termination Date, or District-approved extension thereof, the District may initiate all available enforcement remedies.

5. Time Is Of The Essence.

Time is of the essence for each term and condition of this Compliance Agreement.

6. Applicable Laws.

- a. This Compliance Agreement shall be executed within the State of California and construed in accordance with, and governed by the laws of the State of California.
- b. CCA and the District agree that any action to enforce the terms of this Compliance Agreement shall be venued in Santa Barbara County, California and that California law shall apply.

7. Representations of Authority to Execute Compliance Agreement.

- a. The Responsible Official executing this Compliance Agreement on behalf of CCA affirmatively represents that he has the requisite legal authority to enter into this Compliance Agreement on behalf of CCA and to bind CCA to the terms and conditions of this Compliance Agreement. The Responsible Official executing this Compliance Agreement on behalf of CCA understands that the District is relying on this representation in entering into this Compliance Agreement.

b. The Control Officer executing this Compliance Agreement on behalf of the District affirmatively represents that she has the requisite legal authority to enter into this Compliance Agreement on behalf of the District and to bind the District to the terms and conditions of this Compliance Agreement. The Control Officer understands that CCA is relying on this representation in entering into this Compliance Agreement.

8. Advice of Counsel.

Each of the Parties, by the execution of this Compliance Agreement, represents that it has reviewed each term of this Compliance Agreement with its legal counsel, or has had the opportunity to do so, and further agrees that it shall not deny the validity of the Compliance Agreement on the grounds that it did not have advice of counsel.

9. Binding Effect.

This Compliance Agreement shall apply to and be binding upon the District, CCA and its officers, directors, agents and employees. CCA shall not be relieved of its obligations to comply with this Compliance Agreement.

10. Waiver of Enforcement.

The waiver by the District or any of its officers, agents or employees or the failure of the District or its officers, agents or employees to take action with respect to any right conferred by, or any breach of any obligation or responsibility of this Compliance Agreement shall not be deemed a waiver of such obligation or responsibility, or subsequent breach of same, or any terms, covenants or conditions of this Compliance Agreement. The parties agree that the language of this paragraph of the Compliance Agreement is reciprocal to both parties.

11. Integration Clause.

This Compliance Agreement constitutes the entire Compliance Agreement between the District and CCA concerning the terms set forth herein and supersedes all prior negotiations, representations, or agreements, whether written or oral. In the event of a dispute between the parties as to the language of this Compliance Agreement or the construction or meaning of any term hereof, this Compliance Agreement shall be deemed to have been drafted by the District and CCA in equal parts so that no presumptions or inferences concerning its terms or interpretation may be construed against any party to this Compliance Agreement.

12. Severability Clause.

Should any portion or paragraph of this Compliance Agreement be found to be unenforceable or unconscionable, such portion shall be severed, and stricken or otherwise reformed without affecting the remainder of the Compliance Agreement which shall be enforced without emendation.

13. Effective Date.

The Effective Date of this Compliance Agreement shall be when fully executed by the Parties.

Central Coast Agriculture

By: _____ Date: _____

Santa Barbara County Air Pollution Control District

By: _____ Date: _____

enc: Attachment A – Penalty Structure

DRAFT

DRAFT

ATTACHMENT A – PENALTY STRUCTURE

| Penalty Description | On-Time Penalty Amount | Late Penalty Amount | Penalty Payment Due Date | Applicable Compliance Agreement Condition |
|-----------------------------------|-------------------------------|--|---|--|
| Final Signed Compliance Agreement | \$443,000 | N/A | April 21, 2023 | 3.c. |
| CEQA Determination Notification | \$27,900 | N/A | Within 7 calendar days of the CEQA determination notification from the District | 3.f. |
| Emission Controls Deadline | \$54,000 | \$54,000 + \$5,000 per day ² | Within 7 calendar days of the date all required emission controls are installed and operational, as confirmed by the District | 3.h. |
| Complete PTO Application Deadline | \$54,000 | \$54,000 + \$5,000 per day ² | Within 7 calendar days of the date of the PTO Completeness letter from the District | 3.j. |
| TOTAL | \$578,900 | \$578,900 + \$5,000 per day² | | N/A |

Notes:

1. Refer to the Applicable Compliance Agreement condition noted for each Penalty Description to determine if the On-Time Penalty Amount or the Late Penalty Amount is due.
2. Per day is defined as each calendar day between the deadline specified in the applicable Compliance Agreement condition and the date compliance is achieved for the applicable Compliance Agreement condition.

From: [Kaitlin E. McNally](#)
To: [Lindsay Cokeley](#); [Matthew Allen](#)
Cc: [David I. Harris](#); [Carly V. Barham](#); [Jenna Richardson](#)
Bcc: [Aeron Arlin Genet](#)
Subject: RE: CCA Manufacturing Facility Compliance Agreement
Date: Thursday, April 13, 2023 9:16:00 AM

Hello Lindsay and Matt,

During our meeting last Friday, you informed us that you do not expect the control equipment proposed in ATC 15634 to meet the emission limits and capture and control efficiencies that will be required in the ATC. You also asked if the Compliance Agreement could be revised to address different emission control equipment. As we responded during the meeting, we're not sure we can do a Compliance Agreement for this scenario because of the time it would add to CCA achieving compliance. But, we don't currently have enough information to make that determination.

If you would like to propose new control equipment for the District's review, please submit the following:

- A new ATC application with the details about the new proposed control equipment. Please be sure to include a revised narrative project description, full equipment list in electronic format (not pdf), and everything else that was required for the ATC 15634 application. The new permit application must remain at the same production levels that were applied for in ATC 15634. If the application includes confidential information, please be sure to follow the District's Policy and Procedure for Handling of Confidential Information (<https://www.ourair.org/wp-content/uploads/6100-020-1.pdf>).
- A written request to withdraw the current application for ATC 15634, including an explanation of the technical reasons for the withdrawal which you explained to us in the meeting on Friday. Please note, once the application for ATC 15634 is withdrawn it would not be able to be reinstated; if you end up deciding to revert to the original application, you'd need to resubmit the complete application again.

The District's goal is for CCA to achieve compliance as expeditiously as possible, so time is of the essence. If you would like the District to consider a Compliance Agreement for the new permit application, we would need to receive the submittals listed above by April 27, 2023. Please note, even if this information is received by the deadline, the District may still need to evaluate other enforcement options including seeking an abatement order or DA referral for an injunction.

Feel free to reach out if you have any questions.

Best regards,

Kaitlin



Kaitlin McNally

Compliance Division Manager
Air Pollution Control District
Santa Barbara County

McNallyK@sbcapcd.org

805.979.8298

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

[Sign Up for Air Alerts](#)

From: Kaitlin E. McNally

Sent: Friday, April 7, 2023 5:08 PM

To: Lindsay Cokeley <lindsay@ccagriculture.com>; Matthew Allen <matthew@ccagriculture.com>

Cc: David I. Harris <HarrisD@sbcapcd.org>; Carly V. Barham <BarhamC@sbcapcd.org>; Jenna Richardson <jrichardson@countyofsb.org>

Subject: CCA Manufacturing Facility Compliance Agreement

Hello Lindsay and Matt,

Thank you for discussing the Compliance Agreement with us this afternoon. In response to your request, please see attached for the Compliance Agreement penalty calculations.

Have a nice weekend.

Best regards,

Kaitlin



Kaitlin McNally

Compliance Division Manager

Air Pollution Control District

Santa Barbara County

McNallyK@sbcapcd.org

805.979.8298

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

[Sign Up for Air Alerts](#)

Received 5/2/2023

CENTRAL COAST AGRICULTURE, INC.



85 W Hwy 246 #233, Buellton CA 93427

TELEPHONE: 818.317.8414
E-MAIL: lindsay@ccagriculture.com

April 27, 2023

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

Re: Authority to Construct Application - 1201 Chestnut Ave - Central Coast Ag Products, LLC

On April 7, 2023 the Santa Barbara County Air Pollution Control District (“District”) met with Central Coast Agriculture (“CCA”) to discuss the details of a Compliance Agreement for the subject facility. It was determined at that meeting that the District does not have enough information to make a determination on whether the District can enter into a Compliance Agreement with CCA. The District suggested that CCA submit a new application (Authority to Construct) for its facility to utilize new emission control technology.

A formal request was received from Kaitlin McNally on April 13th to submit a new ATC application with the details about the new proposed control equipment. All of the application materials are found in the attached documents. Kaitlin also requested that CCA submit a written request to withdraw the current application for ATC 15634, including an explanation of the technical reasons for the withdrawal which were explained during the meeting on April 7th.

CCA would like to request that ATC 15634 remain active until such time that the District determines that they are able to enter into a compliance agreement upon review of the new application submitted April 27th. CCA would like to reserve the right to try to install the previously proposed technology and come under the emission limits outlined in ATC 15634, if a Compliance Agreement is not possible for the new application.

Technical Reasoning for Request for New Control Technology

At the time of application for ATC 15634, Best Available Control Technology for the Cannabis industry had not been established. CCA has worked closely with District personnel to ensure the subject facility can achieve and maintain compliance with District Rule 201, and establish BACT for the entire industry. The originally proposed project and

control technology efficiencies were theoretical, and upon further review, that technology alone would not meet the emissions limitations that were outlined in the application. CCA refined the technology to include a combustion source, and has designed a system that includes both the previous cold trap technology with the additional control of an Enclosed Flare heat exchanger. This technology is both technically feasible and meets the previously stated emissions limitations. The additional controls are required in order to sustain CCA's historical and current production levels, and no increased production is being requested as a part of this ATC application.

Notice of CEQA Determination

CCA has previously submitted information requested by the District in order to make a CEQA determination. The project proposed in the new ATC application does not include increases to production beyond historical uses of the facility. Therefore, with the exception of the project description, all information previously provided for CEQA review can be applied to this application. Please let us know if the information needs to be resubmitted separately from this application.

Confidential Information

The new application for this facility includes confidential information, therefore CCA has provided copies of all information in the application deemed confidential with confidential information redacted. This follows the District's policy and procedures for handling confidential information.

Equipment Manuals and Specifications

An equipment list has been provided as a part of this application. It should be noted that all equipment on this list is broken down based on recent guidelines given by the District's permit engineering department. The equipment list provided in the original application (ATC 15436) was created before receiving these guidelines, and therefore is not as accurate or as comprehensive as this list. The new equipment list has been updated to include information such as "parent" equipment with components that the District considers to be permissible. Certain types of equipment such as glassware and OEM built-in motors have been excluded.

In addition, CCA considers all equipment manuals and specifications to be confidential. Therefore, we are requesting that the District refer to the previous ATC 15634 for those manuals, as they were previously provided following the above described policies and procedures for handling of confidential information. CCA is requesting the District to refer to these manuals because these documents are very large, and it would require an extensive amount of time to provide new, redacted versions. The exception to this request pertains to the newly proposed control technology specifications, which have been provided with this application along with redacted versions.

Please let us know if you have any questions or additional requests, and we look forward to being able to move this project forward in an expeditious manner.

Sincerely,

Lindsay Cokeley
Director of Compliance

Attachments:

- APCD Form 01 Package
 - Project Description (Redline/Clean + Confidential/Redacted Versions)
 - Lead Agency Permits
 - Lead Agency CEQA Determination
- BACT Form 02 Package
 - BACT Selection Process Discussion
 - Clearinghouse Review
 - Enclosed Flare Spec Sheet
- APCD Form 104 Package
 - Equipment List (Confidential/Redacted PDF Versions)
- Process Flow Diagram Mass Balance (Confidential/Redacted Versions)
- Equipment List Excel File (Confidential)
- Site Plans (Confidential/Redacted Versions)
 - Odor Control System Diagram

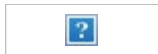
From: [Lindsay Cokeley](#)
To: [Carly V. Barham](#)
Cc: [Kaitlyn McNally](#); [David I. Harris](#); [Matthew Allen](#)
Subject: Response to CEQA RFI #2 - 1201 Chestnut Ave
Date: Friday, May 5, 2023 4:23:12 PM
Attachments: [Cover Letter - Response to RFI #2.pdf](#)
[23-04-25 Project Reapplication - Attachment V2 - Redacted.pdf](#)
[Attachment A.pdf](#)
[Attachment B - Comments and Responses Summary.pdf](#)
[Attachment C.pdf](#)
[Attachment D - Geology and Seismicity Investigation Report.pdf](#)
[Attachment E - EIS Social Impacts and Resolution.pdf](#)

Hi Carly,

Please see the attached cover letter and associated attachments in response to the request for information received last month. Please let me know if you or the consultants have any further questions.

Hope you have a great weekend. Happy Cinco de Mayo!

Thank you,



Lindsay Cokeley

Director, Compliance | CCA

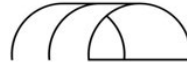
(818) 317-8414

ccagriculture.com



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CENTRAL COAST AGRICULTURE, INC.



85 W Hwy 246 #233, Buellton CA 93427

TELEPHONE: 818.317.8414
E-MAIL: lindsay@ccagriculture.com

May 5, 2023

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

Re: Response to Request for Information - 1201 W Chestnut Ave - CEQA Review

Dear Carly,

Central Coast Agriculture (“CCA”) received a request for additional information relating to the CEQA Review for the Authority to Construct (“ATC”) Application 15634 on March 23, 2023 via email. Additional clarifications were requested and provided to CCA by April 5, 2023. The additional information requested is in response to a Request for information (“RFI #1”) dated January 27th, 2023 and CCA’s subsequent response (“Response to RFI #1”) submitted to the District on February 22, 2023.

At a meeting on April 7th, 2023 with District planning, engineering, and compliance, the District suggested that CCA submit a new ATC application for its facility to utilize new emission control technology. Due to the urgency of needing to submit this application, the planning department allowed CCA to respond to the additional request for information (“RFI #2”) after the new ATC application was submitted. A redacted version of the application was submitted to the District on April 27, 2023. A confidential version was submitted in person to the District on May 2, 2023 via flash drive following the District’s policies and procedures for handling confidential information.

This letter serves to provide the additional information requested by the Planning department in order to continue the CEQA review for the facility located at 1201 W. Chestnut Ave, Lompoc, CA. The new application submitted on April 27th, 2023 does not propose an increase in production beyond historical levels, and therefore the information previously submitted for the CEQA review is still applicable to the new ATC application. The exception to this is the project description, which describes the new control technology. The revised project description is included an attachment to this letter.

1. #32 HMMP describes a Spill Prevention and Response Plan and an Emergency Action Plan. Please provide copies of these.

See Attachment A

- HMMP describes incorporation of the HMBP, but no details are included. Some may be redacted. Please provide the HMBP, and letters from fire department and most recent fire department inspection reports confirming that the Fire Department has approved the HMBP and has inspected the facilities with no outstanding violations or recommendations. We did not see a certified HMBP from the California Environmental Reporting System (CERS) or any information from the Fire Department indicating the HMBP inspections.*

See below screenshot indicating that the HMBP information for Facility CERSID #10829842 has been accepted through CERS. The City of Lompoc Fire Department does not conduct inspections on Hazardous Materials Business Plans. The CUPA Regulator (as described in the facility summary screenshot) is Santa Barbara County EHS. Inspections from this agency are addressed in request #12 below.

Facility Summary Prepare Submittal

Facility Information

Facility Name/Address
Central Coast Ag Products, LLC (CERS ID: 10829842)
1201 W Chestnut Ave
Lompoc, CA 93436

Business Name
Central Coast Agriculture, Inc (Buellton)

Regulator(s)

Regulator Name/Address
Santa Barbara County Environmental Health Services
225 Camino del Remedio
Santa Barbara, CA 93110
Phone: (805) 681-4900
Fax: (805) 681-4901
Contact Email: cupa@sbcpd.org
Web Site: <https://www.countyofsb.org/2171/Hazardous-Materials>

Regulates the following Submittal Element(s):

| | |
|-----------------------|-----------------------|
| Facility Information | Materials Inventory |
| ER and Training Plans | UST |
| Tiered Permitting | Recyclable Materials |
| Consolidation Site | HazWaste Tank Closure |
| APSA | CalARP |

California Environmental Reporting System: Business Lindsay Cokeley's Account Sign Out Tools Reports Help

CERS Business Home Submittals Facilities Compliance My Business

Submittal History: Central Coast Ag Products, LLC
 Home » Facility Search » Summary_10829842 » Submittal History

Summary

Submittals

Submittal Elements

Notifications

Compliance

Prepare Submittal

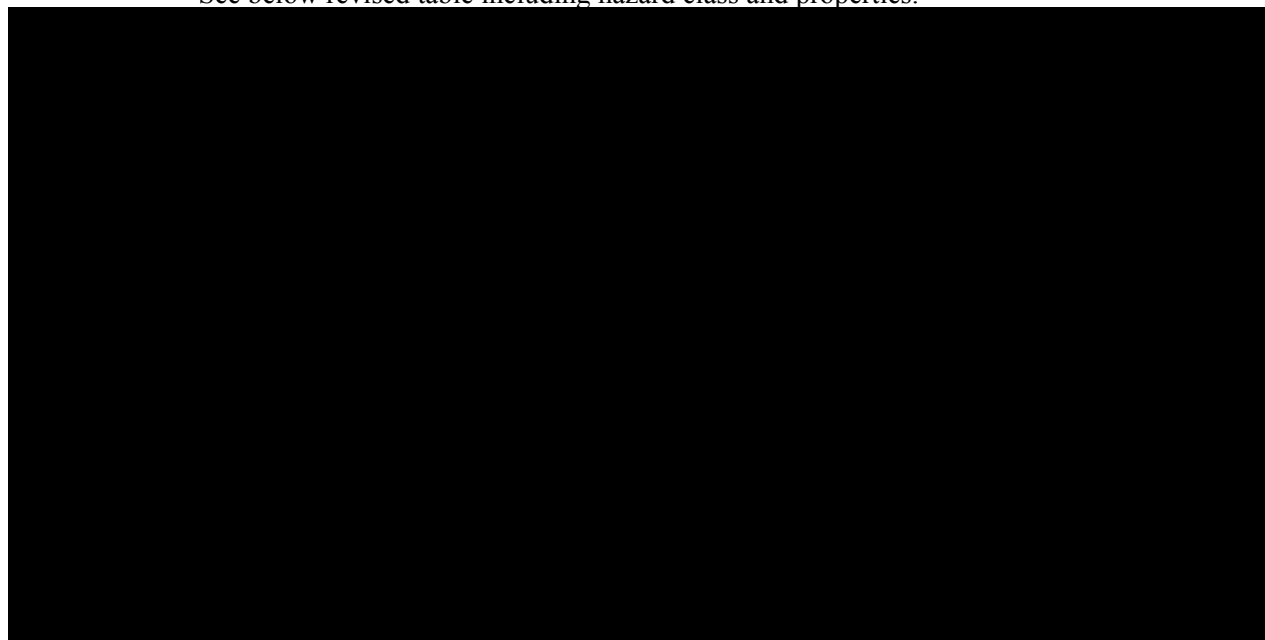
| Submitted | Facility | Inventory | Plans | UST | Haz Waste | Recycling | Remote Waste | Tank Closure | APSA |
|-------------------------|-----------|-----------|-----------|-----|-----------|-----------|--------------|--------------|-----------|
| 3/28/23 | Accepted | Accepted | Accepted | | | | | | Accepted |
| | 3/29/2023 | 3/29/2023 | 3/29/2023 | | | | | | 3/29/2023 |
| 4/29/22 | Accepted | | | | | | | | Accepted |
| | 6/7/2022 | | | | | | | | 6/7/2022 |
| 4/15/22 | Accepted | Accepted | | | | | | | |
| | 6/7/2022 | 6/7/2022 | | | | | | | |

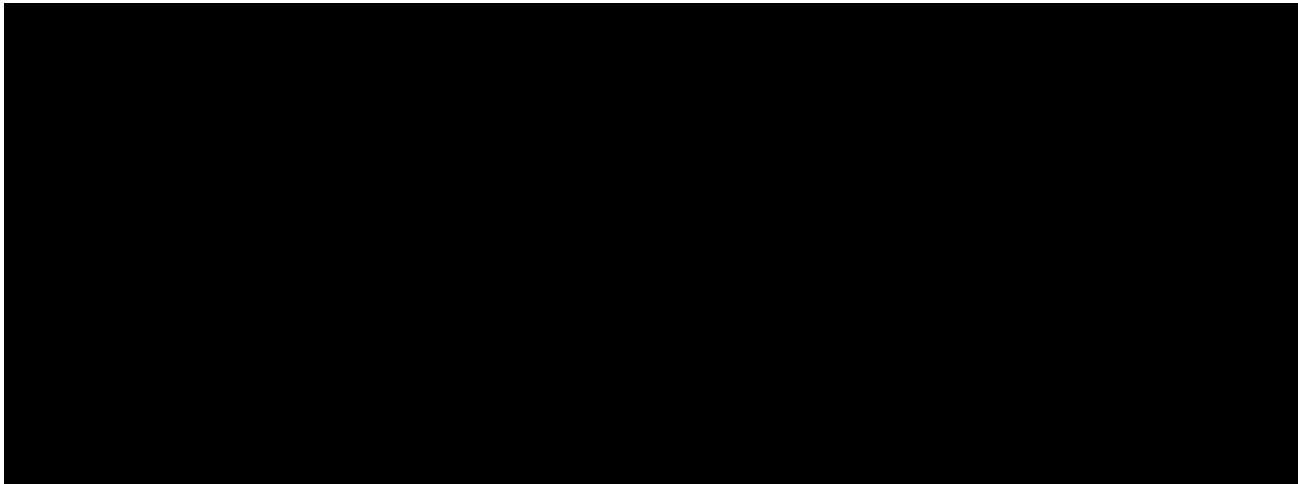
3. Solvent invoices indicate only invoices from July 2022 to January 2023. Some of these may be repetitive invoices, but the totals do not seem to match the indicated [REDACTED] lbs total delivered in 2022. For example, during the July-Jan timeframe, about [REDACTED] cylinders of [REDACTED] were delivered, totaling about [REDACTED] and [REDACTED] cylinders of [REDACTED] were delivered totaling [REDACTED]. Please provide clarification on the total amounts delivered in 2022.

Clarification on the total amounts delivered in 2022 was provided via a phone conversation with Carly on March 27, 2023. The correct total lbs delivered in 2022 is [REDACTED] as previously described. Additionally, a spreadsheet was also provided via email showing invoice #'s and associated calculations for the number of lbs/gal solvent purchased. This document is included in this response as **Attachment B**.

4. Provide at least the category and classification of the materials, such as flammable class.

See below revised table including hazard class and properties.





5. *Describe how an increase in processing will not generate an increase in waste.*

CCA is not proposing an increase in processing beyond historical levels as a part of the new application submitted.

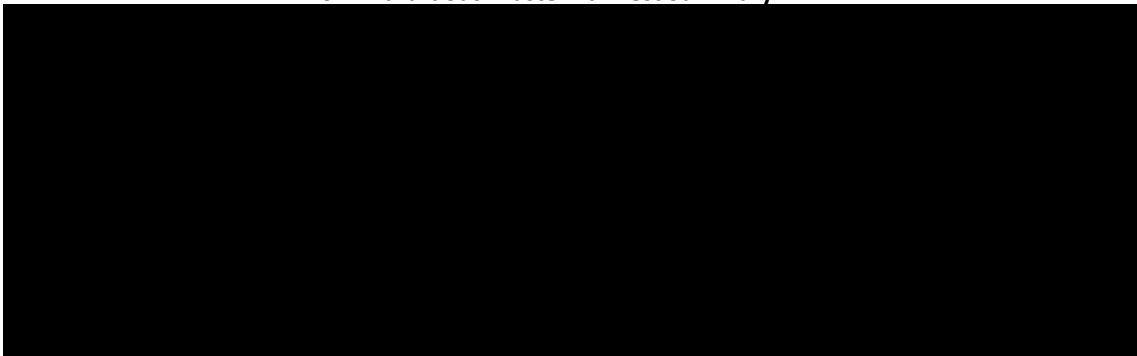
6. *CCA still owes additional information on RWQCB requirements.*

See **Attachment C** for record of the NEC application with the SWRCB for Industrial Stormwater activities. The facility does not utilize any process water and therefore does not generate liquid waste that is regulated by the RWQCB. The facility has a waste water discharge permit with the City of Lompoc. All wastewater is routed through the municipal sewer system. All liquid waste that is not wastewater is disposed of as hazardous waste.

7. *#32 Provide units of sum of quantity (gallons or pounds?) and frequency of removal/generation (pounds per year, for example).*

See below revised tables showing Types, Volume, and units of measure for Hazardous Waste generation and removal for 2021 and 2022.

2021 Hazardous Waste Manifest Summary



2022 Hazardous Waste Manifest Summary

8. #30: *information on both hazardous waste and cannabis waste is needed. Quantities of hazardous waste are listed in #30. Please also provide quantities of cannabis waste and frequency (tons per year?).*

The majority of cannabis waste accumulated at the facility is post-extraction biomass. There are periodic waste events where non-conforming materials are destroyed. We utilize a third-party waste hauler for cannabis waste in compliance with the DCC regulations.

9. #34: *Provide information documenting that the fire department has inspected the facility and the facility is in compliance with fire department requirements and the HMBP requirements.*

See response to item #2 and item #12.

10. #34: *no indication is shown that LEL and O2 sensors and alarms are installed on the inspection card. Please provide clarification and more details on detection and alarm systems. For example, if LEL exceedance is detected, what measures are taken to reduce the LEL in the building to prevent an explosion? Are there high-volume exhaust systems, for example, that would be automatically activated to ensure LEL are not exceeded?*

In regard to LEL sensors and alarm:

Processes where LEL are involved are only conducted in a C1D1 or H Occupancy classified space. These spaces are equipped with C1D1 LEL sensors that are integrated into the 3rd party monitored fire alarm. These LEL sensors have two alarm thresholds; the first alarm is a supervisory alarm that notifies designated personnel that 10% - 15% LEL was detected and allows us to troubleshoot and diagnose root cause. The second alarm activates above 25% LEL and sounds off the building fire alarm with audible/visual indicators, warranting an evacuation. At this point, the exhaust fans will automatically increase to 100% running capacity and immediately exchange the air out of the C1D1 booths. Once LEL percentages have been restored to permissible levels and the alarms are reset, LEL% is verified with a handheld meter. All personnel are allowed to return into the building only when LEL sensors have been restored to permissible levels.

In regard to the O2 sensors:

O2 sensors are equipped in key strategic locations where LN2 may deplete oxygen levels. These sensors are also integrated onto the 3rd party monitored fire alarm. If an O2 sensor detects 19.5 percent volume or less, the building fire alarm with audible/visual indicators are activated, warranting an evacuation. At this point, the main LN2 line will automatically be shut off mitigating further exposure to LN2. Once O2 levels have been restored to permissible levels, the alarms are reset, O2 level is verified with a handheld meter, and all personnel are allowed to return into the building only when oxygen levels have been restored to permissible levels.

11. *Provide documentation that the seismic anchoring as required has been installed.*

Seismic anchoring has not been installed for the extraction equipment. The equipment is in the process of being recertified and a new engineering report will include recommendations on the seismic anchoring requirements in its new location. The recertification process is not expected to be complete until the end of 2023 or early 2024. Currently, the extraction equipment is restrained from movement using castor locks. The equipment is also hard plumbed into the C1D1 extraction booth which is mounted to the concrete slab.

12. *Provide the documentation of HMBP acceptance and inspections.*

See **Attachment D** for the most recent inspection report.

13. *Provide documentation on the 2020 complaints and the City manager issue resolution. #47 does not seem to provide any information on existing and planned noise sources, particularly during the periods when the facility will be operating 24/7.*

See **Attachment E** for the email correspondence between the City Manager and our staff regarding resolution of the odor complaints.

14. #47 does not seem to provide any information on existing and planned noise sources, particularly during the periods when the facility will be operating 24/7.

Most of the ambient noise is below 65dB at the fenceline. There are occasional noise sources that are periodic in nature and not sustained for long periods of time that may go up to 80db at the fenceline. It should be noted that this is an industrial area and we have never received any noise complaint in the 3 years that the facility has been in operation in Lompoc. Below is a summary of the noise sources:

- One refrigerated container located on the East side of Laurel cycling 24/7.
- Two compressors on the West side of the buildings cycling while production is running .
- Eight HVAC condensers on the West side of Chestnut cycling during operating hours.
- Three HVAC condensers on the West side of Laurel cycling during operating hours.
- Two condensers on the West side of Laurel cycling during machine operation.
- Two generators on the East side running for test or emergency only
- PRV located between buildings, periodic during operating hours.
- GN2 vent on the West side of Chestnut during operating hours, periodic during operating hours.
- Evap tower on the West side of Chestnut silent except for one second purge, periodic during operating hours.

Sincerely,

Lindsay Cokeley
Director of Compliance

Attachments:

- Attachment A: SPP and EAP
- Attachment B: Solvent Invoice Summary
- Attachment C: NEC Application
- Attachment D: HMBP/CUPA Inspection Report
- Attachment E: Odor Complaint Resolution
- Project Description Dated 4.25.2023

From: [Carly V. Barham](#)
To: [Lindsay Cokeley](#)
Cc: [William S. Sarraf](#); [Agnieszka Letts](#); [David I. Harris](#)
Subject: RE: Response to CEQA RFI #2 - 1201 Chestnut Ave
Date: Thursday, May 18, 2023 2:22:45 PM

Hi Lindsay,

Yes, thank you for that clarification. This might be obvious but just to make sure we are on the same page, I would imagine that your permit will limit biomass extraction to only occurring at three trains and prohibit the fourth from conducting biomass extraction to ensure that the level of biomass extraction capacity remains consistent with existing operations. Is CCA comfortable with this?

You could discuss with Will and/or Agnieszka whether it makes sense to identify specific trains for biomass extraction or there could be flexibility to move biomass extraction vs. distillation around between booths.

Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.979.8337

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Tuesday, May 16, 2023 4:24 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: David I. Harris <HarrisD@sbcapcd.org>; William S. Sarraf <SarrafW@sbcapcd.org>
Subject: Re: Response to CEQA RFI #2 - 1201 Chestnut Ave

Hi Carly,

I want to make the correction that we have 4 extraction trains (however one of them is used for distillation of solvent only - not biomass extraction), and the three biomass extraction trains are what have been in existence and what we would like to be the baseline for our permit as that is the "bottleneck" for downstream operations. Let me know if that makes sense as we discussed.

Thank you,
Lindsay Cokeley

On Mon, May 15, 2023 at 12:00 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Hope you had a great Mother's Day weekend. I wanted to circle back from our call on Friday.

Based on what we discussed, I came away with the impression that the intention of CCA's most recent permit application is to permit the existing operations at the facility with added emissions controls. You stated that CCA has, and has always had, three extraction trains installed and operating at the facility, and that CCA is not proposing additional extraction trains or extraction capacity at this time. As production is limited by extraction capacity, the facility's current materials imports and exports (including solvent deliveries, raw cannabis material import, saleable cannabis product export) would stay substantially similar.

If this is accurate, there may be little effect of this permit action that would need to be considered under CEQA. Moreover, the project described in your most recent permit application (assigned as ATC 16090) could likely qualify for a categorical CEQA exemption if we can support the finding that the project would result in negligible or no expansion of use beyond that previously existing.

As we discussed, we will calculate the criteria pollutant and greenhouse gas emissions from the proposed combustion device and let you know if there are any questions or concerns.

Also, as we discussed on Friday, you may want to reconsider the prior information that was submitted regarding the facility's electricity usage post-project. The materials provided to us (in July 2022) assumed that electricity usage would increase 1.5 times 2021 usage. On first impression, it would seem like if your proposed operations are substantially similar to existing operations (minus the installation of the proposed emission controls) your electrical demand may not increase as much as previously assumed.

Please let me know if there is anything I misinterpreted, or any other questions or comments to discuss. Otherwise, we will be in touch once we have completed the full completeness review of your application.

Sincerely,
Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org

805.979.8337

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From: Lindsay Cokeley <lindsay@ccagriculture.com>

Sent: Friday, May 12, 2023 9:05 AM

To: Carly V. Barham <BarhamC@sbcapcd.org>

Subject: Re: Response to CEQA RFI #2 - 1201 Chestnut Ave

Can I call (or you can call me) in 5 min?

My number is (818) 317-8414

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Fri, May 12, 2023 at 9:01 AM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Good morning,

How is your morning looking? Do you want to talk soon or different time or next week is fine.

Best,
Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.979.8337

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From: Lindsay Cokeley <lindsay@ccagriculture.com>

Sent: Thursday, May 11, 2023 4:25 PM

To: Carly V. Barham <BarhamC@sbcapcd.org>

Subject: Re: Response to CEQA RFI #2 - 1201 Chestnut Ave

I can probably chat tomorrow at 9am.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Thu, May 11, 2023 at 4:23 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

I had some initial conversations with staff today and would like to get clarifications on a few aspects of the new application, including production levels. Would you have some time tomorrow to talk? My schedule is open 9:00-4:00.

Thanks,

Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.979.8337

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From: Lindsay Cokeley <lindsay@ccagriculture.com>

Sent: Monday, May 8, 2023 4:47 PM

To: Carly V. Barham <BarhamC@sbcapcd.org>

Cc: Kaitlin E. McNally <McNallyK@sbcapcd.org>; David I. Harris <HarrisD@sbcapcd.org>;
Matthew Allen <matthew@ccagriculture.com>; Alex Economou <EconomouA@sbcapcd.org>

Subject: Re: Response to CEQA RFI #2 - 1201 Chestnut Ave

Thanks Carly! Looking forward to hearing back on the status.

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Mon, May 8, 2023 at 4:37 PM Carly V. Barham <BarhamC@sbcapcd.org> wrote:

Hi Lindsay,

Thank you for these responses. Along with the recent permit application submittal, the District will review and be in touch on the status of your project and CEQA requirements.

Hope your week is off to a great start!

Sincerely,
Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.979.8337
Out of office Wednesdays

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

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Friday, May 5, 2023 4:23 PM
To: Carly V. Barham <BarhamC@sbcapcd.org>
Cc: Kaitlin E. McNally <McNallyK@sbcapcd.org>; David I. Harris <HarrisD@sbcapcd.org>;
Matthew Allen <matthew@ccagriculture.com>
Subject: Response to CEQA RFI #2 - 1201 Chestnut Ave

Hi Carly,

Please see the attached cover letter and associated attachments in response to the request for information received last month. Please let me know if you or the consultants have any further questions.

Hope you have a great weekend. Happy Cinco de Mayo!

Thank you,



Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

ccagriculture.com



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June 1, 2023

Certified Mail 9171 9690 0935 0247 1094 71

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

FID: 11664
Permit: A 16090
SSID: 11415

Re: Incomplete Authority to Construct Application 16090

Dear Lindsay Cokeley:

On May 2, 2023, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC) No. 16090 for a cannabis extraction, manufacturing, and distribution 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) 979-8317 or email me at LettsA@sbcapcd.org. Thank you for your cooperation.

Sincerely,



Agnieszka Letts, Air Quality Engineer 1
Engineering Division

Attachment: Incompleteness Items

cc: Central Coast Agriculture - 1201 W Chestnut Ave. 11664 Project File
Engr Chron File
William Sarraf
David Harris
Kaitlin McNally
Carly Barham

\\sbcapcd.org\shares\Groups\ENGR\WP\Cannabis\FID 11664 - Central Coast Agriculture - Chestnut Ave\ATCs\ATC 16090\ATC 16090 - ATC Incompleteness - 5-17-2023

Aeron Arlin Genet, Air Pollution Control Officer

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

ATTACHMENT

ATC NO. 16090 INCOMPLETENESS ITEM LIST

1. **Proposed Operating Schedule.** Various operating schedules are proposed, including peak and non-peak season schedules as well as an additional schedule outlined in Form-104. Please define what peak and non-peak seasons are and provide the worst case operating schedule. Please note that your emission calculations will be based on this information.

| | | | |
|-----------------------------|-----------|------------|--|
| Proposed Operating Schedule | | | |
| Peak Season | | | |
| Hours/Day | Days/Week | Weeks/Year | |
| Non-Peak Season | | | |
| Hours/Day | Days/Week | Weeks/Year | |

2. **Existing Operating Schedule.** Provide a description of the facility’s current operating schedule under existing operations, including during peak and non-peak seasons.

| | | | |
|-----------------------------|-----------|------------|--|
| Existing Operating Schedule | | | |
| Peak Season | | | |
| Hours/Day | Days/Week | Weeks/Year | |
| Non-Peak Season | | | |
| Hours/Day | Days/Week | Weeks/Year | |

3. **Process Descriptions.** Provide a detailed description of each individual process line and what is occurring within those lines (i.e., which solvents are being used and how, which equipment is being used and how, and when control equipment is being implemented and their associated control efficiencies.) This should correlate with an updated equipment list that specifies the equipment within each process in the flow diagram.

Additionally, clarify how the 4th extraction train will be used for distillation only and whether or not the extraction trains will be interchangeable for the various processes/solvents or if each process/solvent will be limited to the same train.

4. **Rule 321 Compliance.** How will the proposed solvent cleaning emissions comply with District Rule 321 requirements? As proposed, the current solvent cleaning emissions exceed the allowable limits per Rule 321 Section M.1. (Rule 321 link: <https://www.ourair.org/wp-content/uploads/Rule321.pdf>.)
5. **Existing Solvent Usage.** In previous correspondence with the District, CCA indicated that a total of 114,660 lbs of extraction solvent was used in 2022. Please confirm that the proposed project would use substantially the same or less solvent than the facility’s existing usage. If not, please explain.
6. **Electricity Usage.** Please provide the facility’s total kWh usage in 2022 with supporting documentation (e.g., utility bills) and confirm the anticipated electricity demand necessary to support the currently proposed project. For background, CCA indicated that their previously proposed project described in ATC 15634 would require 1.5x the electricity usage than the facility’s usage in 2021. Specifically, CCA anticipated their previously proposed project would

require 2,118,914 kWh per year. This estimate may have been developed in conjunction with a project description that included additional equipment usage, including additional biomass extraction capacity, beyond what is now proposed.

7. Best Available Control Technology (BACT).

- a. **Combustion Source.** The BACT Selection Process Discussion attached to Form-02 specifies that the combustion source would “burn the remaining ROC vapor at a 99.9% destruction efficiency), however the current process flow diagram, solvent emission calculations table, and manufacturer specification sheets provided show the destruction efficiency of the combustion source as 98%.

BACT for combustion sources similar to the proposed device is a destruction efficiency of 99% ROC or 10 ppmv @ 3% O₂ or less (as methane) outlet concentration. Please provide manufacturer specification sheets/guarantees or source test data showing that the proposed technology can comply with these requirements.

- b. **Form-02.** Update Form-02 to include analysis for all process lines including the controls applied or a detailed explanation and analysis of why BACT controls cannot be applied (i.e., not technologically feasible, cost prohibitive, etc.)

8. Process Flow Diagram.

- a. For each individual process line, identify which solvent(s) are being used. Include SDSs if not previously submitted.
- b. Label control efficiencies assumed at each control device.
- c. For each step/process line, include labels that correspond to the equipment located there.

9. Equipment List Updates. Update the equipment list to correspond to the process flow diagram by identifying and grouping equipment belonging to the same process line.

10. Emission Calculations.

- a. **Combustion Source Calculations.** Please provide worst case emission calculations (including criteria pollutants and greenhouse gases) for the combustion source’s fuel burning based on the rated heat input and fuel consumption. These calculations will be part of your facility’s permitted potential to emit.
- b. **Solvent Calculations.**
 - i. Update the emission calculations table to be consistent with the process flow diagram and submit them in an electronic spreadsheet form. Please include relevant information and assumptions including operating schedules and control efficiencies and how those control efficiencies were determined. Please note that the emission calculation table and the process flow diagram currently submitted have inconsistent solvent usage assumptions. The calculations should be based on the worst case operational scenario for the facility.

Please note that the solvent cleaning operations must comply with District Rule 321 requirements for ROC content.

- ii. How was the ROC control efficiency of the warm extraction step (where the biomass goes) determined?
- iii. **Fugitive Losses.** Please update the emission calculations to assume losses along the process flow diagram due to fugitive losses. If no such losses will occur, please explain why (i.e., the process is under vacuum, the lines are sealed with leak free gaskets/seals, etc.)

11. **Cost Reimbursement.** The District has determined that work related to the review and issuance of ATC 16090 will be done on a cost reimbursement basis as the District has determined the use of fee schedules listed in Rule 210 will not enable the District to recover the cost related to permit processing, review and issuance. All work previously conducted for the review of the application will be charged on a cost reimbursement basis to the existing reimbursable account.

From: [Kaitlin E. McNally](#)
To: lindsay@ccagriculture.com
Cc: [David I. Harris](#); [Carly V. Barham](#); [William S. Sarraf](#); [Agnieszka Letts](#)
Bcc: [Aeron Arlin Genet](#)
Subject: RE: Incomplete Authority to Construct Application 16090
Date: Friday, June 2, 2023 5:45:00 PM
Attachments: [ATC 16090 - A.C. Incomplete Authority to Construct - 5-17-2023.pdf](#)

Hello Lindsay,

If you would like the District to continue considering a Compliance Agreement for the new permit application, items 1-6 in the attached incompleteness letter need to be addressed as soon as possible and no later than Monday, June 12. Please note, even if this information is received by the deadline, the District may still need to evaluate other enforcement options including seeking an abatement order or DA referral for an injunction.

Please contact Agnieszka Letts at (805) 979-8317 or at LettsA@sbcapcd.org if you have any questions about the incompleteness items.

Best regards,

Kaitlin



Kaitlin McNally

Compliance Division Manager
Air Pollution Control District
Santa Barbara County

McNallyK@sbcapcd.org
805.979.8298

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From: Alyssa Whorton <WhortonA@sbcapcd.org>
Sent: Thursday, June 1, 2023 3:51 PM
To: lindsay@ccagriculture.com
Cc: William S. Sarraf <SarrafW@sbcapcd.org>; David I. Harris <HarrisD@sbcapcd.org>; Kaitlin E. McNally <McNallyK@sbcapcd.org>; Carly V. Barham <BarhamC@sbcapcd.org>
Subject: Incomplete Authority to Construct Application 16090

Dear Lindsay Cokeley,

Attached is a copy of the Incomplete letter for Authority to Construct (ATC) No. 16090 (FID: 11664) for a cannabis extraction, manufacturing, and distribution facility.

A hard copy of this letter will be mailed out as well.

Should you have any questions, please contact Agnieszka Letts at (805) 979-8317 or at LettsA@sbcapcd.org.

Thank you for your cooperation.

Sincerely,



Alyssa Whorton
Office Technician
Air Pollution Control District
Santa Barbara County

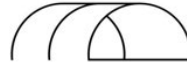
WhortonA@sbcapcd.org

(805) 979-8293

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CENTRAL COAST AGRICULTURE, INC.



85 W Hwy 246 #233, Buellton CA 93427

TELEPHONE: 818.317.8414
E-MAIL: lindsay@ccagriculture.com

June 15, 2023

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

Re: Response to Incompleteness Letter #1 for Authority to Construct Application - 1201 Chestnut Ave - Central Coast Ag Products, LLC

1. Proposed Operating Schedule.

| | | | | | |
|-----------------|----|-----------|---|----------|----|
| Peak Season* | | | | | |
| Hours/Day | 24 | Days/Week | 7 | Weeks/Yr | 16 |
| Non Peak Season | | | | | |
| Hours/Day | 24 | Days/Week | 5 | Weeks/Yr | 36 |

* The “peak season” is not defined by a specific time of year and, instead, is driven by increases in sales demand. This often falls in line with promotions and/or holidays, and therefore has been estimated to occur during 16 weeks throughout the year.

2. Existing Operating Schedule.

The existing operating schedule is the same as the proposed, and also fluctuates throughout the year based on sales demand around promotions and holidays. As of June 12th, the facility is currently operating 24 hours a day, 5 days per week.

3. Process Descriptions.

The equipment list provided can be sorted by location utilizing columns C and D. Each location represents a different process, or is a sub process of a larger process. Not all processes and equipment are included in the flow diagram, as a large percentage of the equipment pieces and processes do not utilize process solvent or create emissions and would only utilize solvent for cleaning purposes,

if at all. Column O of the provided equipment list also categorizes the equipment by process.



The process flow diagram for extraction has been amended to include equipment IDs from the equipment list provided.

4. Rule 321 Compliance.

CCA complies with Rule 321 Section M.1.a, M.1.b, and M.1.c. All solvent use from wipe cleaning is dispensed from containers that are kept closed to prevent evaporation, except while dispensing solvent.

5. Existing Solvent Usage.

CCA will use less than [REDACTED] lbs of extraction solvent per year for the proposed project.

6. Electrical Usage.

The total electrical usage in 2022 was approximately 1,943,480 kWh. The facility has 4 separate electrical meters. Utility bills for all of the meters at 1201 Chestnut have been included. The previous estimate given was in conjunction with the project description that included additional equipment usage, however that additional equipment usage was not related to additional biomass extraction capacity, and instead was estimated in conjunction with the anticipated equipment list that was a part of the permit application ATC 15634, which included all existing processes at the facility such as freeze drying of flower.

CCA is compiling the remaining information in response to the Incompleteness letter and will send it as soon as it is complete.

Sincerely,

Lindsay Cokeley
Director of Compliance

Attachments:

1. [Process Flow with Equipment IDs](#)
2. [2022 Utility Bills](#)

3. [Summary of Electrical Usage \(all meters\)](#)

From: [Lindsay Cokeley](#)
To: [Agnieszka Letts](#)
Subject: Re: Incomplete Authority to Construct Application 16090
Date: Wednesday, August 16, 2023 11:50:48 AM

Hi Agnieszka,

We are working diligently to respond to the incomplete letter received on June 1. Please confirm if the District will approve an extension to the permit processing per District Rule 208.D.4.

Thank you,

Lindsay Cokeley
Director, Compliance | CCA
(818) 317-8414

On Tue, Aug 15, 2023 at 12:09 PM Agnieszka Letts <LettsA@sbcapcd.org> wrote:

Hi Lindsay,

The District encourages you to submit the remaining information as soon as possible. The original permit application was submitted on November 23, 2020 and a revised permit application was submitted on May 2, 2023. The District and CCA have been negotiating and working on a compliance agreement since March 24, 2023. As we have continued to emphasize, time is of the essence on this application and facility because it continues to operate without a permit or control technology.

Sincerely,



Agnieszka Letts

Air Quality Engineer II
Air Pollution Control District

Santa Barbara County

LettsA@sbcapcd.org

805-979-8317

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Wednesday, August 9, 2023 3:18 PM
To: Agnieszka Letts <LettsA@sbcapcd.org>
Subject: Re: Incomplete Authority to Construct Application 16090

Hi Agnieszka,

We are waiting on the BACT vendor that we are working with to get back to us on some items, and we are hoping to have a response back to the District by October 1 for the remaining items.

We would like to please request an extension for the permit processing for ATC 16090.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA
(818) 317-8414

On Tue, Aug 8, 2023 at 12:52 PM Lindsay Cokeley <lindsay@ccagriculture.com> wrote:

Hi Agnieszka,

I am in some all day meetings today. Let me check in with the team on status and I will get back to you tomorrow.

Lindsay

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Agnieszka Letts <LettsA@sbcapcd.org>
Sent: Tuesday, August 8, 2023 12:28:35 PM
To: Lindsay Cokeley <lindsay@ccagriculture.com>
Subject: RE: Incomplete Authority to Construct Application 16090

Hi Lindsay,

Just checking back in on this to see if you have a timeline for the remaining items.

The District has done an initial review of the items submitted but will do a complete review once the remaining items are received.

Thank you!

Agnieszka Letts

Air Quality Engineer I
Air Pollution Control District

Santa Barbara County

LettsA@sbcapcd.org

805-979-8317

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Thursday, July 20, 2023 9:06 AM
To: Agnieszka Letts <LettsA@sbcapcd.org>
Subject: Re: Incomplete Authority to Construct Application 16090

Hi Agnieszka,

I have a meeting with the team today and I will be getting an update on the timeline to answer the remaining incomplete items. Has the district been able to review our initial response? Are there additional items that need to be addressed for those incomplete responses?

Thank you,

Lindsay Cokeley
Director, Compliance | CCA
(818) 317-8414

On Tue, Jul 18, 2023 at 4:41 PM Agnieszka Letts <LettsA@sbcapcd.org> wrote:

Hi Lindsay,

Hope you're doing well. I'm following up to see if you have made any progress on the remaining incompleteness items and/or if you have any questions.

Thank you,

Agnieszka Letts

Air Quality Engineer I
Air Pollution Control District

Santa Barbara County

LettsA@sbcapcd.org

805-979-8317

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

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Friday, June 16, 2023 8:26 AM
To: Alyssa Whorton <WhortonA@sbcapcd.org>; Agnieszka Letts <LettsA@sbcapcd.org>
Cc: William S. Sarraf <SarrafW@sbcapcd.org>; David I. Harris <HarrisD@sbcapcd.org>; Kaitlin E. McNally <McNallyK@sbcapcd.org>; Carly V. Barham <BarhamC@sbcapcd.org>
Subject: Re: Incomplete Authority to Construct Application 16090

Apologies - I failed to attach the process flow (attachment 1 listed in the letter).

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

On Thu, Jun 15, 2023 at 11:13 AM Lindsay Cokeley <lindsay@ccagriculture.com> wrote:

Hello,

Please see attached for our initial response to the Incomplete Letter received.

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

(818) 317-8414

On Thu, Jun 1, 2023 at 3:51 PM Alyssa Whorton <WhortonA@sbcapcd.org> wrote:

Dear Lindsay Cokeley,

Attached is a copy of the Incomplete letter for Authority to Construct (ATC) No. 16090 (FID: 11664) for a cannabis extraction, manufacturing, and distribution facility.

A hard copy of this letter will be mailed out as well.

Should you have any questions, please contact Agnieszka Letts at (805) 979-8317 or at LettsA@sbcapcd.org.

Thank you for your cooperation.

Sincerely,

Alyssa Whorton

Office Technician

Air Pollution Control District

Santa Barbara County



WhortonA@sbcapcd.org

(805) 979-8293

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

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From: [Marina E. Lupini](#)
To: [Lindsay Cokeley](#)
Subject: Request for Information
Date: Thursday, August 31, 2023 10:23:00 AM

Hi Lindsay,

Thanks again for facilitating our inspection yesterday of the facilities comprising FID 11664; I think it was a productive day and appreciate yours and Carlos's time spent walking us through everything. As discussed yesterday, thank you for providing the following information in a timely manner:

1. Detailed Engine use logs for the Emergency/Standby Diesel Internal Combustion Engines (E/S DICE) permitted by ATC/PTO 15650 and Reeval 15344 (2023 year to date)
2. Solvent purchase records for May 2023- August 2023
3. Solvent use logs for May 2023-August 2023 (the log which shows the weight of cylinders before/after use as described yesterday while we were in the solvent storage area, and any other solvent use records you may have)
4. Product information for the [REDACTED] used in solvent wipe cleaning, such as label, MSDS, etc; and if applicable, any records showing solvent usage for solvent wipe cleaning
5. Hazardous waste manifests from May 2023-August 2023, if applicable
6. Cannabis throughput information for May 2023-August 2023

Since some of the information will likely be confidential, you may want to plan to drop off a flash drive like for the last information request. Please let me know what time within the next two weeks would be best for you, and I'll work with our staff in the South County to facilitate dropoff. Non-confidential information like the engine use logs can be emailed to me directly in the meantime.

Thank you,



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)

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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 NOVs 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

From: [Marina E. Lupini](#)
To: [Kaitlin E. McNally](#)
Subject: 8-31-23 inspection of FID 11664
Date: Friday, September 1, 2023 5:12:57 PM

Good afternoon Kaitlin,

I wanted to update you on my recent inspection of CCA's cannabis manufacturing and processing facilities located at 1201 W. Chestnut St. and 1200 W. Laurel St. in Lompoc (comprising FID 11664). The inspection was conducted by me, Compliance Supervisor Eric Kett, and District Engineer Agnieszka Letts. We observed cannabis manufacturing and processing activities and associated solvent cleaning activities taking place while we were onsite. The manufacturing and processing equipment for which NOVs were issued previously is still onsite; we did not observe any newly installed equipment onsite (since my last inspection at the facility on 5/30/23).

On 8/31/2023 I sent Lindsay Cokeley a request for follow-up information which is needed to make a complete compliance determination. My request has been saved to the facility correspondence folder. I have not received any acknowledgement of receipt (a read receipt was requested) but requested that the information be provided within the next two weeks. I will keep you apprised when I receive a response from CCA. The inspection report is in process but won't be finalized until the complete compliance determination is made. Please let me know if you have any other questions in the meantime.

Best,



Marina Lupini

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RULE 802. NEW SOURCE REVIEW
(Adopted 4/17/1997, revised 8/25/2016)

A. Applicability

The purpose of New Source Review is to provide for the review of new and modified stationary sources of air pollution and provide mechanisms by which Authorities to Construct for such sources may be granted without interfering with the attainment or maintenance of any ambient air quality standard, preventing reasonable further progress towards the attainment or maintenance of any ambient air quality standard and without interfering with the protection of areas designated attainment or unclassifiable. This rule shall apply to any applicant for a new or modified stationary source which emits or may emit any affected pollutant.

B. Exemptions

1. The provisions of this rule shall not apply to any existing stationary source which was previously exempt from the permit provision of these Rules and Regulations and a Permit to Operate is required solely because of a change in permit exemptions.
2. The Control Officer may exempt any equipment replacement from the offset requirements of Section E of this rule if:
 - a. The replacement is functionally equivalent,
 - b. There is no increase in the potential to emit of any air contaminant,
 - c. The applicant applies Best Available Control Technology, and
 - d. The replacement does not debottleneck the process (e.g., increase the system's production rate).
3. Projects that meet the requirements of Health and Safety Code sections 42301.2 or 42301.13 are exempt from the offset requirements of Section E of this rule. If such emission increases are later reduced or eliminated, the emission reduction shall not be considered surplus for the purpose of emission reduction credits.
4. Emergency standby generator, flood control, and firewater pump piston-type internal combustion engines are exempt from the offset requirements of Section E of this rule.

C. Definitions

See Rule 102, Definitions, and Rule 801, New Source Review – Definitions and General Requirements, for definitions.

D. Requirements – Best Available Control Technology

1. An applicant shall apply Best Available Control Technology to a new or modified stationary source which has a potential to emit any nonattainment pollutant or its precursors which meets or exceeds any threshold specified in Table 1 or has a potential to emit any attainment pollutant or its precursors which meets or exceeds any threshold specified in Table 2. For the purposes of this section, "potential to emit" for modified stationary sources means the potential to emit from the project.

**Table 1: Nonattainment Pollutant
Best Available Control Technology Thresholds**

| Pollutant | Pounds/day |
|--|------------|
| Any nonattainment pollutant or its precursors (except carbon monoxide) | 25 |
| Carbon Monoxide – if designated nonattainment | 150 |

**Table 2: Attainment Pollutant
Best Available Control Technology Thresholds**

| Pollutant | Pounds/day | Tons/year |
|---|------------|-----------|
| Particulate Matter | 120 | -- |
| PM ₁₀ | 80 | -- |
| PM _{2.5} | 55 | -- |
| Carbon Monoxide | 500 | -- |
| Nitrogen Oxides (as Nitrogen Dioxide) | 120 | -- |
| Sulfur Oxides (as Sulfur Dioxide) | 120 | -- |
| Reactive Organic Compounds (ROCs) | 120 | -- |
| Lead | 3.28 | -- |
| Asbestos | 0.04 | -- |
| Beryllium | 0.0022 | -- |
| Mercury | 0.55 | -- |
| Vinyl Chloride | 5.48 | -- |
| Fluorides | 16.4 | -- |
| Sulfuric Acid Mist | 38.4 | -- |
| Total Reduced Sulfur (including H ₂ S) | 54.8 | -- |
| Reduced sulfur compounds | 54.8 | -- |
| Municipal waste combustor organics | -- | 0.0000035 |
| Municipal waste combustor metals | -- | 15 |
| Municipal waste combustor acid gases | -- | 40 |
| All other attainment pollutants or precursors | 120 | -- |

2. For any stationary source subject to a nonattainment pollutant Best Available Control Technology requirement, Best Available Control Technology shall be the more stringent of:
 - a. The most effective emission control device, emission limit, or technique which has been achieved in practice for the type of equipment comprising such stationary source; or
 - b. The most stringent limitation contained in any State Implementation Plan; or
 - c. Any other emission control device or technique determined after public hearing to be technologically feasible and cost-effective by the Control Officer.

3. For any stationary source subject to an attainment pollutant Best Available Control Technology requirement, Best Available Control Technology shall be an emission limitation based on the maximum degree of reduction achievable for each pollutant. Best Available Control Technology shall be determined on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs. Best Available Control Technology may consist of any of the following: application of alternative production processes, fuel cleaning or treatment, innovative fuel combustion techniques, or any other technique for control of each pollutant. In no event shall application of Best Available Control Technology result in emissions which would exceed the emissions allowed under the applicable New Source Performance Standards.

4. An applicant shall apply attainment pollutant Best Available Control Technology to a new source or modification of an existing major stationary source, for any emissions increase which would construct within 10 kilometers of a Class I area and which would have an impact on such area equal to or greater than 1 microgram per cubic meter (24-hour average).

E. Requirements – Offsets Thresholds

The applicant for a new or modified stationary source with a potential to emit of any affected pollutant or its precursors which is equal to or greater than any threshold shown in Table 3 shall mitigate the project’s potential to emit by providing Emission Reduction Credits as qualified under Rule 806, Emission Reduction Credits. The applicant subject to offsets shall comply with the requirements in Rule 804, Offsets.

Table 3: Offset Thresholds

| Pollutant | Pounds/day | Tons/year |
|---|------------|-----------|
| Carbon Monoxide – if designated nonattainment | 150 | 25 |
| Nonattainment pollutants and precursors (except carbon monoxide and PM _{2.5}) | -- | 25 |
| Attainment pollutants and precursors (except carbon monoxide and PM _{2.5}) | 240 | -- |

F. Requirements – Air Quality Impact Analysis Thresholds

1. The applicant for any new or modified stationary source with a potential to emit of any pollutant or its precursors which is equal to or greater than any threshold shown in Table 4 shall submit an Air Quality Impact Analysis with their application. The Air Quality Impact Analysis shall be conducted pursuant to Rule 805, Air Quality Impact Analysis, Modeling, Monitoring, and Air Quality Increment Consumption, and shall demonstrate to the satisfaction of the Control Officer that the emissions will not cause a violation or interfere with the expeditious attainment or maintenance of any ambient air quality standard or prevent reasonable progress towards the expeditious attainment or maintenance of any ambient air quality standard or cause any ambient air quality increment to be exceeded. For the purposes of this section, "potential to emit" for modified stationary sources means the potential to emit from the project. In addition, the Control Officer may require an Air Quality Impact Analysis for any new or modified stationary source that the Control Officer has determined has the potential to cause or contribute to a violation of any ambient air quality standard or increment. This paragraph shall not require an Air Quality Impact Analysis for the assessment of the effects of ozone precursor emissions on ozone.

Table 4: Air Quality Impact Analysis Thresholds

| Pollutant | Pounds/day | Tons/year |
|--|------------|-----------|
| Particulate Matter | 120 | -- |
| PM ₁₀ | 80 | -- |
| PM _{2.5} | 55 | -- |
| Carbon Monoxide | 500 | -- |
| Nitrogen Oxides (as Nitrogen Dioxide) | 120 | -- |
| Sulfur Oxides (as Sulfur Dioxide) | 120 | -- |
| Reactive Organic Compounds (ROCs) | 120 | -- |
| Lead | 3.28 | -- |
| Asbestos | 0.04 | -- |
| Beryllium | 0.0022 | -- |
| Mercury | 0.55 | -- |
| Vinyl Chloride | 5.48 | -- |
| Fluorides | 16.4 | -- |
| Sulfuric Acid Mist | 38.4 | -- |
| Total Reduced Sulfur (including H ₂ S) | 54.8 | -- |
| Reduced sulfur compounds | 54.8 | -- |
| Municipal waste combustor organics | -- | 0.0000035 |
| Municipal waste combustor metals | -- | 15 |
| Municipal waste combustor acid gases | -- | 40 |
| All other attainment or nonattainment pollutants or precursors | 120 | -- |

- The applicant for a new or modified stationary source which has the potential to emit more than 20 pounds per hour of any attainment pollutant or total suspended particulates shall demonstrate to the satisfaction of the Control Officer through use of air quality models meeting the requirements of Rule 805, Section D.1 (Air Quality Models) and Rule 805, Section F (Requirements – Ambient Air Quality Standards and Air Quality Increments), that their emissions will not cause an ambient air quality standard or increment to be exceeded.

G. Requirements – Air Quality Impact Analysis: Pre and Post-Construction Monitoring

- The applicant for a new or modified stationary source which will have a potential to emit any attainment pollutant greater than a threshold shown in Table 5 shall conduct ambient air quality monitoring for at least one year before commencing construction.

The Control Officer may exempt new non-major stationary sources or modifications from this requirement if there is sufficient data to determine the effects that the emissions from the stationary source or modification may have on air quality in the area.

Table 5: Attainment Pollutant Monitoring Thresholds

| Pollutant | Pounds/day |
|---------------------------------|------------|
| Particulate Matter | 120 |
| PM ₁₀ | 80 |
| PM _{2.5} | 55 |
| All other attainment pollutants | 240 |

- The applicant shall conduct post-construction monitoring until the Control Officer determines the effects of emissions from the stationary source or modification.

3. All monitoring shall comply with Environmental Protection Agency guidelines (see 40 CFR 58) and other instructions of the Control Officer.

4. Protection of Class I Areas

The applicant for any new or modified stationary source shall conduct post-construction monitoring if all the following conditions are met:

- a. The source will be within a Class I or Class I impact area,
- b. The source will increase ambient pollutant concentration within the Class I area by one microgram per cubic meter (24 hour average), and
- c. The source has the potential to emit over 100 tons per year of any attainment pollutant.

H. Requirements – Visibility, Soils, and Vegetation Analysis

For a new or modified stationary source with a potential to emit any attainment pollutant over any threshold shown in Table 5, the applicant shall provide the Control Officer with an analysis of the impairment to visibility, soils, and vegetation that would occur as a result of the source or modification and of general commercial, industrial, and other growth associated with the source or modification.

I. Requirements – Administration

1. Analysis, Notice and Reporting

The Control Officer shall comply with the following requirements for any new or modified stationary source with an emission increase of any air pollutant (or its precursors) which is equal to or greater than any threshold shown in Tables 3 and 4 of this rule.

- a. Make available for public inspection at the District's office the analysis of the effect of the source on air quality and the preliminary decision to grant or deny the Authority to Construct.
- b. Publish a notice once by advertisement in at least one newspaper of general circulation in the District, stating where the public may inspect the information on the preliminary decision to grant an Authority to Construct. The notice shall provide 30 days for the public to submit comments on the application, beginning on the date of publication.
- c. Notify the applicant, Air Resources Board, and adjoining air pollution control districts of the District's preliminary decision to grant the Authority to Construct. The notice will be provided in writing at the time of public notice. The Air Resources Board shall be provided an analysis support package for the determination.
- d. Consider all comments submitted. If within the 30-day notice period the Control Officer receives a written request from the Air Resources Board to defer his or her decision pending that agency's review of the application, the Control Officer shall defer any decision for a period of 30 days from the date of such request. The Control Officer shall take final action on the application after considering all written comments.
- e. The public notice will include notification of the opportunity for a public hearing and will indicate the anticipated degree of increment consumption. A public hearing may be called if sufficient interest is generated or if any aggrieved party so requests in writing within the 30-day comment period. All public hearings shall have a public notice issued at least 30 days prior to the hearing. After considering all comments, including those presented at any hearings held, the Control Officer will reach a decision and notify the applicant, Air

Resources Board, adjoining air pollution control districts, and any person who has made a written request to be notified of the final decision. The Control Officer's notification of the final decision may be made electronically.

2. Conditional Requirements for Authority to Construct

The Control Officer shall, as a condition for the issuance of an Authority to Construct for a new stationary source or modification and with the prior written consent of the applicant for any source which provides offsets:

- a. Require that the new source or modification and any sources which provide offsets be operated in the manner assumed in making the analysis. The permit shall, if applicable, include an emissions limitation which corresponds with the application of Best Available Control Technology or innovative control technology.
- b. Modify, or require modification of, the Authority to Construct and Permit to Operate for any source used to provide offsets to ensure that emission reductions at that source which provide offsets will be enforceable and maintained throughout the operation of the new or modified source which is the beneficiary of the offsets.
- c. Permit any enforceable methods, other than those described in sub-section b), which will assure that all required offsets are achieved and meet the requirements of Rule 804, Offsets.

3. Issuance of Permit to Operate

- a. The Control Officer shall issue a Permit to Operate if it is determined that:
 - 1) The new or modified stationary source will operate without emitting pollutants in violation of any applicable state, federal or local emission limitation or these Rules and Regulations; and
 - 2) The emissions of any pollutants from the new or modified stationary source are less than or equal to the emissions used by the Control Officer in granting an Authority to Construct; and
 - 3) The offsets required as a condition of the Authority to Construct will commence at the time of or prior to initial operations of the new source or modification, will be maintained throughout the operation of the new or modified source, and are enforceable. In the case of a new or modified source which will be, in whole or in part, a replacement for an existing source on the same property, the Control Officer may allow a maximum of ninety (90) days as a start-up period for simultaneous operation of the existing source and the new source or replacement; and
 - 4) All conditions specified in the Authority to Construct have been or will be complied with by any dates specified.

4. Denial of Authority to Construct

The Control Officer shall deny an Authority to Construct for any new stationary source or modification, or any portion thereof unless the new source or modification, or applicable portion thereof, complies with the provisions of this rule and all other applicable District Rules and Regulations.

5. Offset Exemption Tracking

The Control Officer shall prepare an annual report that lists all equipment units that have been exempted from offset requirements under the equipment replacement provisions in Section B.2. The report shall include a comparison of the emissions of the new equipment and the emissions of the replaced equipment. This report shall be made available to the public and the Air Resources Board.