

**REDACTED**

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**Subject:**RE: APCD Permitting for Cannabis Processing

**Date:**2021-08-17 1:25 pm

**From:**"David I. Harris" <[HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org)>

**To:**"Eady, Nathan" <[NEady@scsengineers.com](mailto:NEady@scsengineers.com)>, Laura Nuzzo  
<[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>

**Cc:**"Petro, Christopher" <[CPetro@scsengineers.com](mailto:CPetro@scsengineers.com)>

Thanks Nathan! It was good to talk to you and Laura today.

Sincerely,



**David Harris**

Engineering Manager  
Air Pollution Control District  
Santa Barbara County

[HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org)  
[805.961.8824](tel:805.961.8824)

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**From:** Eady, Nathan <[NEady@scsengineers.com](mailto:NEady@scsengineers.com)>  
**Sent:** Tuesday, August 17, 2021 11:50 AM  
**To:** David I. Harris <[HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org)>; Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>  
**Cc:** Petro, Christopher <[CPetro@scsengineers.com](mailto:CPetro@scsengineers.com)>  
**Subject:** RE: APCD Permitting for Cannabis Processing

David,

Here is a redacted version of the BACT response we provided to the SJV APCD for a cannabis solvent facility in the Valley. I'll dig around and see if I have anything additional.

***Nathaniel J Eady, AICP***

***Vice President and Project Director***

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***Tracer Environmental Services***

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**From:** David I. Harris <[HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org)>  
**Sent:** Friday, August 13, 2021 8:03 AM  
**To:** Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>  
**Cc:** Eady, Nathan <[NEady@scsengineers.com](mailto:NEady@scsengineers.com)>; Petro, Christopher <[CPetro@scsengineers.com](mailto:CPetro@scsengineers.com)>  
**Subject:** RE: APCD Permitting for Cannabis Processing

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Good morning Laura,

Either of those times will work for me. Please let me know what the team prefers.

Sincerely,

David Harris

Santa Barbara County APCD

(805) 961-8824

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**From:** Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>  
**Sent:** Thursday, August 12, 2021 4:38 PM  
**To:** David I. Harris <[HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org)>  
**Cc:** Eady, Nathan <[NEady@scsengineers.com](mailto:NEady@scsengineers.com)>; Petro, Christopher <[CPetro@scsengineers.com](mailto:CPetro@scsengineers.com)>  
**Subject:** Re: APCD Permitting for Cannabis Processing

I'd like to join and I'm available tomorrow at 9:30 am or next Tuesday between 10-12.

**Laura M. Nuzzo**

President/Senior Environmental Engineer

**NUZZO ENVIRONMENTAL, INC.**

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

176 Seacliff Drive

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805-441-8496

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On 2021-08-12 4:32 pm, David I. Harris wrote:

Hi Nathan,

Good to hear from you and thanks for reaching out. I do think it would be easiest to jump on a phone or Teams call to discuss your questions. I am available tomorrow before 10:30 am or anytime in the afternoon, or next Tuesday for a call. Let me know what works best for you and if you would like me to set up a Teams call.

Sincerely,



**David Harris**

Engineering Manager  
Air Pollution Control District  
Santa Barbara County

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**From:** Eady, Nathan <[NEady@scsengineers.com](mailto:NEady@scsengineers.com)>  
**Sent:** Thursday, August 12, 2021 2:49 PM  
**To:** David I. Harris <[HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org)>  
**Cc:** Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>; Petro, Christopher <[CPetro@scsengineers.com](mailto:CPetro@scsengineers.com)>  
**Subject:** APCD Permitting for Cannabis Processing

David,

Laura and I were hoping to pick your professional brain on something. We reviewed the APCD's permit applicability memo for the cannabis industry and were wondering if we can get clarification regarding permitting requirements for cannabis processing facilities which do not have onsite cultivation. I clearly understand how to approach facilities with manufacturing such as solvent extraction, etc. But facilities with processing limited to bucking, drying, grading, and bulk packaging is a little harder to wrap my head around. They have no greenhouse so no boilers. Their generator is back-up power only. So although they are potentially subject to APCD permits, I have a hard time discerning what equipment or process would actual warrant the ATC.

Have you guys run into this scenario yet and if so what are the regulated sources? Let me know if its easier to just hop on the phone next week and spit ball.

Thanks, Nathan

***Nathaniel J Eady, AICP***

***Vice President and Project Director***

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