

**REDACTED**

**Subject:**RE: Rule 317 Question

**Date:**2021-09-07 3:35 pm

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

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

Laura,

Cannabis facilities are a different animal entirely; they aren't solvent facilities for the purposes of applying BACT. There are no finalized BACT standards for cannabis facilities in the State that I'm aware of. In addition to Sac Metro, I have heard that South Coast AQMD, Monterey, and San Joaquin are working on their own BACT standards. I don't know how far along in the process these are though.



**Kevin Brown**

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**From:** Laura Nuzzo <[laura@nuzzoenvironmental.com](mailto:laura@nuzzoenvironmental.com)>  
**Sent:** Tuesday, September 7, 2021 3:29 PM  
**To:** Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>  
**Subject:** Re: Rule 317 Question

Kevin,

Thanks for getting back to me today. I was wondering about the BACT threshold, so thank you for clarifying.

I was also wondering if cannabis processing facilities that use solvent are considered a "solvent facility" for the 98% ROC control BACT requirement. My most recent conversation with David Harris on the cannabis solvent facility BACT was that SB APCD had not finalized their BACT determination yet. I also spoke to Brian Krebs, the engineering manager at Sac Merto AQMD. He thought they were the farthest along of all the Air Districts with their cannabis solvent facility BACT and although theirs isn't finalized yet, their preliminary determination is 95% ROC control with no specific technology identified.

Regards,  
Laura

**Laura M. Nuzzo**  
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