

**REDACTED**

# REDACTED

From: **Kevin M. Brown** <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>  
Date: Thu, Aug 26, 2021 at 1:37 PM  
Subject: RE: ATC 15748 at 1401 W Central Ave, Lompoc- Meeting Request  
To: Jeanette De Luca <[jeanette@ccagriculture.com](mailto:jeanette@ccagriculture.com)>  
Cc: Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>

Jeanette and Lindsay,

Appreciated the opportunity to talk with you about ATC 15748 this morning. I'm glad most of the items were easy to work through.

Please see attached for the *Odor Control and Management Plan* example outline. The APCD needs a separate plan submittal apart from the City of Lompoc SOP. However, after reviewing the SOP, I expect that there will be large amount of overlap between the two documents.

Additionally, I talked with my supervisor about changing the permit to an ATC/PTO. We have an established policy and procedure that states this permit type needs to be an ATC. Additionally, we required these types of cannabis permits to be ATCs for other operators. So in order to be consistent with our past permitting actions and internal policy, we will be keeping this permit as an ATC.

If you want to discuss the point where agricultural operations turn into cannabis operations, please contact either my supervisor Will Sarraf (805-961-8888, [SarrafW@sbcapcd.org](mailto:SarrafW@sbcapcd.org)) or manager Davis Harris (805-961-8824, [HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org)).

For the ATC 15634 permit application, San Joaquin Valley AQMD and Sacramento Metro AQMD have BACT determinations for cannabis facilities. The formal determinations are not on their websites yet, but I emailed them to get some form of documentation. I'll forward the documents to you when I receive them.

Let me know if you have questions. I'll finalize ATC 15748 this afternoon and send it off to my supervisor.



**Kevin Brown**

Air Quality Engineer III  
Air Pollution Control District  
Santa Barbara County

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

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Cell: (858) 776-7045

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**From:** Jeanette De Luca <[jeanette@ccagriculture.com](mailto:jeanette@ccagriculture.com)>  
**Sent:** Monday, August 23, 2021 8:57 AM  
**To:** Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>  
**Cc:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>  
**Subject:** Re: ATC 15748 at 1401 W Central Ave, Lompoc- Meeting Request

Hi Kevin,  
I just emailed you an invite and Google Meet for Thursday at 11am.

**Thank you,**  
**Jeanette Occhipinti de Luca**  
Compliance Supervisor | CCA  
(805) 450-0304

On Mon, Aug 23, 2021 at 7:38 AM Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)> wrote:

Good Morning Jeanette,

I'm available for a call at the following times this week:

- Monday – After 9 am
- Tuesday – From 8 am to 2 pm
- Wednesday – Available all day
- Thursday – After 10:30 am
- Friday – Available all day

I'm working from home on Monday and Friday. Please call my cell phone if you want to talk either of these days.



**Kevin Brown**

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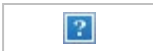
**From:** Jeanette De Luca <[jeanette@ccagriculture.com](mailto:jeanette@ccagriculture.com)>  
**Sent:** Friday, August 20, 2021 10:15 AM  
**To:** Kevin M. Brown <[BrownK@sbcapcd.org](mailto:BrownK@sbcapcd.org)>  
**Cc:** Lindsay Cokeley <[lindsay@ccagriculture.com](mailto:lindsay@ccagriculture.com)>  
**Subject:** ATC 15748 at 1401 W Central Ave, Lompoc- Meeting Request

Hi Kevin,

We received the draft authority letter to construct ATC 15748 for a cannabis loading and storage facility. We would like to schedule a call to go over some of the items listed in the draft.

Can you please provide a few times and days next week that we can schedule a call with you?

Thank you,



**Jeanette Occhipinti de Luca**  
Compliance Supervisor | CCA  
(805) 450-0304  
[ccagriculture.com](http://ccagriculture.com)



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**ODOR CONTROL SYSTEM INSPECTION AND MAINTENANCE PLAN  
EXAMPLE OUTLINE**

# **Odor Control System Inspection and Maintenance Plan**

for

Stationary Source: ABC Cannabis Company  
Stationary Source ID: 12345

Facility: ABC Cannabis Company  
Facility ID: 12345

Prepared by:  
Third Party Inc.  
Ventura, CA 93004

Prepared Date: April 2021

Plan Revision: 1.0

# **ODOR CONTROL SYSTEM INSPECTION AND MAINTENANCE PLAN EXAMPLE OUTLINE**

## **Introduction**

Provide a brief overview of the facility and odor control systems subject to the *Odor Control System Inspection and Maintenance Plan*. Information in this section may include:

- Facility Description
  - Facility Name
  - Address
  - General Facility Operations
- Odor Control System(s)
  - Purpose
  - Manufacturer and Model
  - Quantity
  - Rating (ex. scfm)
  - Control System Media
  - Recommended Canister Replacement Timelines
  - Other Manufacturer Recommended Maintenance Timelines
  - Facility Location
  - District Device IDs

## **Inspection and Maintenance Procedures**

Provide a description of the who, what, when, where, and how the odor control systems are inspected and maintained. Information in this section may include:

- Personnel authorized to conduct inspections and maintenance
- Frequency of inspections and maintenance for each odor control system
- Possible inspection or maintenance triggers (ex. regularly scheduled, odor complaint, etc.)
- Instruments used as part of inspections or maintenance (ex. portable vapor analyzer)
  - Instrument manufacturer and model
  - Instrument manufacturer recommended calibration and maintenance procedures
  - Instrument manufacturer recommended calibration and maintenance frequency
  - Instrument range and accuracy
  - Instrument purpose and use during inspection or maintenance
- Inspection Procedures
  - Frequency of regularly scheduled inspections
  - Step by step instructions how inspections are conducted
  - Inspection sampling locations or walking paths including diagrams or maps
  - Instruments used
  - Name of forms or logs used

## **ODOR CONTROL SYSTEM INSPECTION AND MAINTENANCE PLAN EXAMPLE OUTLINE**

- How the root cause of an odor issue is determined
- How inspection results are reported
- Timelines for re-inspection following maintenance
- Maintenance Procedures
  - Frequency and type of work conducted for regularly scheduled maintenance
  - Timelines to conduct maintenance as a result of an inspection (note the timelines found in the Operational Restrictions condition of your permit)
  - Quantity and location of spare media canisters or other odor control system items kept onsite.

### **Recordkeeping**

Provide a description how the inspections and maintenance will be recorded. Information in this section may include:

- Inspections logs/forms
  - Date and time of inspection
  - Name of personnel conducting inspection
  - Reason for inspection (ex. odor compliant, regularly scheduled, re-inspection following maintenance, etc.)
  - Inspection notes
  - Odor issue root cause (ex. spent carbon media, HVAC system issue, lack of negative pressure in building due to open doors, etc.)
  - If maintenance is required as a result of the inspection
  - What maintenance is required as a result of the inspection
- Maintenance logs/forms
  - Date and time of maintenance
  - Name of personnel conducting maintenance
  - Reason for maintenance (ex. odor compliant, inspection, regularly scheduled, etc.)
  - Specific odor control system having maintained
  - Maintenance conducted (ex. media replacement)
- Record retention policy
- Record location(s)
- Availability of records to the District at the time of District inspections or upon District request.

## **ODOR CONTROL SYSTEM INSPECTION AND MAINTENANCE PLAN EXAMPLE OUTLINE**

### **Attachments**

List the plan attachments here. Information in this section may include:

- Inspection Logs/Forms
- Maintenance Logs/Forms
- Odor control system manufacturer specifications
- Odor control system maintenance procedures and recommended frequency documentation
- Instrument manufacturer specifications
- Instrument maintenance and calibration procedures and recommended frequency documentation

Add the attachments from above to the end of the plan.