

December 23, 2021

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

FID: 11664
Permit: A 15634
SSID: 11415

Re: Incomplete Authority to Construct Application 15634

Dear Ms. Cokeley:

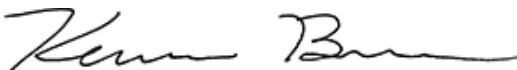
On November 23, 2020, the Santa Barbara County Air Pollution Control District (District) received your application for Authority to Construct (ATC) No. 15634 for a cannabis processing facility. This letter is to inform you that the application is incomplete. Additional information and/or clarification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

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

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

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

Sincerely,



Kevin Brown, Air Quality Engineer III
Engineering Division

Attachment: Incompleteness Items

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

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

ATTACHMENT

ATC NO. 15634 INCOMPLETENESS ITEM LIST

1. **Historical Criteria Pollutant Emission Estimates.** Submit historical criteria pollutant emission estimates for the stationary source (i.e., 1201 W. Chestnut and 1200 W. Laurel) from the time that cannabis manufacturing operations began until the present day. Criteria pollutants are defined as NO_x, ROC, CO, SO_x, PM, PM₁₀, and PM_{2.5}.

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

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

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

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

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

Include the following in the submitted historical GHG emission estimates:

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

- c. Documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the historical emission estimates.
3. **Historical Solvent Usage.** In conjunction with the historical pollutant emission estimates for the stationary source, provide the following supporting solvent documentation:
 - a. Monthly solvent use records since cannabis manufacturing operations began until the present day. Include the solvent manufacturers, product names, MSDS (if not already submitted to the District), and volumes of solvent used.
 - b. Solvent purchase records, batch numbers, hazardous waste manifests, and/or other records required by the State of California and/or City of Lompoc cannabis licenses.
 - c. Fuel use records, hours of operation, receipts, utility provider usage/billing statements, or transport logs/manifests for all non-solvent emission sources.
4. **Proposed Project Greenhouse Gas (GHG) Emissions.** Submit annual direct and indirect GHG emission calculations for the proposed ATC 15634 project. Include documentation and spreadsheets showing input data, calculation methodologies, and assumptions used to calculate the proposed project's direct and indirect GHG emissions.
5. **Process Flow Diagram Mass Balance.** Address the following mass balance inconsistencies in the submitted Project Solvent Flow Diagram:
 - a. "EXTRACTION SYSTEM" solvent input adds up to 7,358 lb/day while the solvent exiting the system adds up to 7,333 lb/day.
 - b. "COLD TRAP M500" solvent input adds up to 1,546 lb/day while the solvent exiting the system adds up to 1,521 lb/day.

Note that this process flow diagram is the basis of the permitted emission calculations and the District wants to ensure that sufficient makeup solvent is permitted for this facility.

6. **Cold Trap Costs.** CCA's response to Item 4.a.iii in the December 2, 2021 incompleteness response letter provides the various capital costs, annual costs and indirect costs associated with the proposed cold trap system. Submit manufacturer invoice(s), quote(s), correspondence or other documentation showing where these values came from. In event that estimates were used for a capital cost, annual cost or indirect cost line item, provide a basis for the cost estimate.
7. **Spent Biomass Technical Feasibility.** CCA's response to Item 4.b.i in the December 2, 2021 incompleteness response letter provides a technical analysis on why the additional flow from baked off solvents would cause icing issues in the proposed cold trap. Provide documentation or correspondence from the cold trap manufacturer confirming that their system would experience icing issues in this operational scenario.

8. **Technically Feasible Cold Trap System.** CCA’s response to Item 4.b in the December 2, 2021 incompleteness response letter notes that connecting the proposed cold trap to ovens (to bake off entrained solvent in the spent biomass) and solvent cleaning operations is technically feasible but is not cost effective nor would work from an operations and de-icing standpoint. Address the following related to technically feasible cold trap systems:
- a. Are there any larger cold traps which could handle the additional air flow and moisture from the ovens and solvent cleaning operations that would be more cost effective than 30 M150 units? If so, provide the costs (i.e., the various capital costs, annual costs and indirect costs noted in Items 4.b.iii.1 through 4.b.iii.7 in the November 2, 2021 application incompleteness letter) associated with this technically feasible cold trap setup.
 - b. Could a condensate knockout be installed upstream of a cold trap(s) that could sufficiently remove enough moisture to prevent rapid ice buildup and allow the ovens, diamond lab and solvent cleaning operations to be controlled?

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

9. **Vacuum System Description.** Provide a description how the 50L Vessels (New Oil Stock) and Jars (Old Oil Stock – Until Depleted) are degassed with using vacuum and the solvent vapors are routed to the cold trap. For example, is the oil run through a degassing system to remove entrained solvents, are the vessels and jars stored in containers or room that are maintained under constant vacuum, etc.
10. **Smaller Cold Trap Manufacturer Specifications.** Submit manufacturer specifications for the smaller cold traps equipped to the fume hood vents.
11. **Second Cold Trap.** CCA’s response to Item 5 in the December 2, 2021 incompleteness response letter notes that “[a] second M150 cold trap is requested to be permitted strictly for redundancy reasons”. Will a second M150 unit be installed? If not, please be aware that the District will not permit this second unit since it is District policy to only permit equipment which will be present at the facility.