

Santa Barbara West Coast Farms

Odor Abatement Plan (OAP)

Policy and Procedure Describing the Actions to be Taken When an Odor Complaint is Received

Odor complaint contact:
Kavanaugh Bagby
858-750-0502

General Protocol

1. A local contact person shall be available by telephone on a 24-hour basis to respond to calls regarding odor complaints.
2. The operator shall provide to property owners and residents of property located within 1,000 feet the contact information of the local contact responsible for responding to odor complaints.
3. The operator shall immediately notify the County of any changes to the local contact.
4. The operator shall notify the County of any complaints that the local contact receives, within 24 hours of receiving the complaint.
5. The local contact shall respond to calls in a timely and appropriate manner. Responding in a timely and appropriate manner means that an initial call shall be responded to within one hour of the time the initial call was made, and a corrective action shall commence within two hours of the initial call, if corrective action is required.
6. The operator shall implement a complaint tracking system for all complaints that the local contact receives, which includes a method for recording the following information:
 - contact information of the complainant, as well as a description of the location from which the complainant detected the odors;
 - time that the operator received the complaint;
 - description of the complaint;
 - description of the activities occurring onsite when the complainant detected the odors; and
 - actions the operator implemented to address the odor complaint.

7. The local contact responsible for responding to odor complaints shall be properly trained regarding the foregoing procedures, including recordation of the information required for the complaint tracking system.
8. The operator shall provide the complaint tracking system records to the Planning & Development Department as part of any Departmental inspections of the cannabis operation and upon the Department's request.
9. The operator shall maintain the complaint tracking records for a minimum of five years.

System Features and Operating Components

The odor mitigation system is manufactured by Byers Scientific & Manufacturing. The system works by distributing a vapor containing the odor neutralizing agent, Ecosorb CNB 100, which mixes in the air with the odor-causing compounds. A waterless vapor-phase system distributes the Ecosorb CNB 100 from a raised pipeline along the edge of the property.

Odor abatement will be installed between the grow area and any nearby sensitive receptors and perpendicular to the wind direction. Since the grow process is open air, and the odor neutralizing agent is distributed in the air, the local air flow patterns will affect the performance of the system. Although the wind speed and direction vary with changes in meteorological conditions, the long-term predominant wind direction is from the west, varying mostly between WNW and WSW.

Odor abatement will be installed with a Supervisory Control and Data Acquisition (SCADA) system that includes programmed logic controllers (PLC) for dosing rate and time-of-day application. In addition, the SCADA may integrate an onsite weather station that will measure wind speed and wind direction with 1-minute frequency. This will allow the odor neutralizer to be programmed to optimize contact with any odor constituents.

Monitoring

Monitoring will be performed during cultivation to ensure the odor neutralizer is working effectively. Performance monitoring will include regular perimeter observations using nasal odor identification. This may include use of EPA Method 2170: Flavor Profile Analysis for the odor surveys EPA Method 1y to start optimize dose and mix

Event-based monitor of odor complaints

Odor detection (e.g., nose or $D/T > 7$)

Review abatement system and dose rate

Air data (wind speed, direction, stability)

Modify abatement system, as needed

OAP Response

Actions when odor complaint is received

- Upon notification of an odor complaint, either from a public member directly or through an agency, SBWCF will perform an onsite assessment. The assessment will include a review of the operational status of the odor abatement system, an evaluation of the current wind conditions and review of the onsite meteorological data, and odor observations upwind of the site both at the time of the assessment and during the time of the odor complaint, as indicated by the onsite weather station.

Potential Odor Reducing Methods

- Odor complaints verified by SBWCF or an agency acting in the public interest will be reviewed to determine the reason why odors were observed and identify corrective measures. Potential odor reducing measures will be considered, such as the installation of additional odor neutralizer delivery systems, the relocation of existing delivery systems, and modification of the dosing rate based on wind data.

Contingency Measures to Prevent Persistent Odors and Continuous Public Nuisance

- SBWCF is committed to the prevention of persistent, intrusive or pervasive odors outside the property boundary, particularly within any residential neighborhoods. To that end, if over time a verified odor complaints exists, SBWCF may take measures to further reduce odorous compounds through source reduction or emission controls. Source reduction measures and/or installation of additional emission control equipment would be coordination with agency staff to ensure proper permitting.