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January 3, 2022

To Whom It May Concern:

We have reviewed the attached odor mitigation plan, dated January 3, 2022, for So Co Grow LLC, located in Santa Rosa, CA.

It is our understanding that the attached plan meets, or exceeds, the requirements of the City of Santa Rosa for cannabis odor mitigation.



Sincerely,
Matthew Torre, Registered Professional Engineer
15000 Inc

ODOR CONTROL & MITIGATION PLAN

January 3, 2022

So Co Grow LLC

1626 Piner Road
Santa Rosa, CA 95403

Report prepared by

15000 Inc.

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Policy

Document a process to limit objectionable odors from the project area utilizing building system components and adopted odor control plan.

Under California Occupational Health and Safety Act (“CalOSHA”) and Bay Area Air Quality Management District (“BAAQMD”) regulations, cannabis businesses do not have a specific set of regulations that govern their operations. However, Asa Schaeffer of So Co Grow LLC (the “Applicant”), will nonetheless maintain a high standard for the air quality plans for all aspects of its proposed Cannabis Microbusiness Facility (Type-12) at 1626 Piner Road, Santa Rosa, CA 95403 (“Facility”).

Generally, the Applicant will meet and/or exceed the standards set by the City of Santa Rosa (“City”) Cannabis Ordinance (including sections 26-88-250 through 26-88-256), California Labor Code §§6300 et seq., and Title 8, California Code of Regulations §§ 332.2, 332.3, 336, 3203, 3362, 5141 through 5143, 5155, and 14301, as published in the CalOSHA Policy and Procedures Manual C-48, Indoor Air Quality as applicable to other facilities.

Pursuant to State of California (“State”) regulations [California Energy Code, Section 120.1(c)3], mechanical outside air ventilation must meet a minimum code required cubic feet per minute (“CFM”) flow rate. Since existing State air quality regulations do not contain provisions specific to cannabis businesses, the Applicant will comply with these general State standards when designing the ventilation systems and air filtrations systems for the entire Facility. Each separate operation within the Facility building will have its own individual “air-scrubber” systems, as described below.

Purpose

To minimize and eliminate the off-site odor of cannabis caused by normal business practices.

Scope

Exterior of facility and surrounding areas.

Responsibilities

Business Owner/Operator (BO/O) is to provide, implement and supervise an odor mitigation plan.

General Procedures

Implementing and maintaining building systems to effectively minimize transmission of odor between building and surrounding areas.

- BO/O shall supervise installment and maintenance of an air treatment system to ensure there is no off-site odor of cannabis overly detectable from adjacent properties or the community. Air treatment systems consist of carbon filtration on the exhaust side of the ventilation system and negatively pressurizing the facility in relation to the exterior ambient condition.
- Staff members should immediately report any odor problems to the BO/O, who will take corrective action, implement upgrades to the system, upgrades to the facility or to the internal handling process of product within the facility to further deter odors.
- If such upgrades require the approval of any Agency Having Jurisdiction (AHJ), the BO/O shall seek and gain such approval prior to implementing new systems and/or procedures.

It is critical to the success of our organization that our various plans remain transparent to the community, so all stakeholders are aware of the importance of mitigated cannabis odors.

This mitigation plan and all associated records will be made available to the public for review and documents can be requested at our facility. All requests for documentation shall occur via written request only (email is acceptable).

The facility will have the following onsite functions: Administrative Processing Areas, Manufacturing, Flowering Room, Drying Room, Veg, Packaging, Secure Storage, Shipping and Receiving, Distribution, and Dispensary. The company will provide packages within state-approved containers for distribution to distribution centers and/or retail outlets. The handling of product will require a properly engineered odor control system in order to mitigate the release of odors to the surrounding properties and community.

Active Measures

All cannabis products will be securely stored in secure rooms with video camera surveillance. The Manufacturing, Flowering, Product Storage, Veg Room, Dry room, Distribution Area, and hall spaces will be tied into exhaust fan systems with activated carbon filters for odor control. Exhaust will be terminated at a minimum of 10'-0" from fresh air intakes into the building per 2019 CMC 502.2.2.

Air Pressure & Carbon Filter Control

The cultivation rooms (Flowering and Veg) and drying rooms will be kept at neutral pressure and the freely communicating/adjacent hallway spaces and product storage will be kept under negative pressure by means of an exhaust system with activated carbon filters for odor mitigation. The exhaust discharge shall be designed to discharge the exhaust air away from any neighbors or pedestrians.

Hallways shall be provided with carbon filter and exhaust fans to maintain negative pressure to the adjacent spaces (acting as anteroom type areas) to further limit spread of nuisance odors from the facility. These fans shall be controlled, at a minimum, by time clock to operate during normally occupied hours of operation.

Each filter will be provided with a magnahelic differential pressure gauge to measure the pressure drop across the filter, with initial and final filter pressure drop set points marked to indicate useable lifespan of the filter. Frequency of filter maintenance will strictly adhere to manufacturer's listed data and recommendation.

Exhaust fans will be electronically interlocked with the space conditioning systems to ensure constant negative pressure within the various spaces whenever the HVAC systems are in use.

Best Available Technology

The combination of activated carbon air filtration and building pressure control represent the current best available technology. For anticipated comfort space conditioning systems, the building shall be provided with MERV-13 filters on the fresh air intake side to limit particulate intake to the space and to enhance the overall quality of the supply air to the occupants.

Air System Design

The Facility shall have no operable windows or be kept locked and sealed at all times. All doors shall be sealed with proper weather stripping, keeping circulating and filtered air inside the facility.

On site usage of cannabis products is strictly prohibited while on the property. This will assist in mitigating odors to the surrounding neighbors.

Monitoring, Detection and Mitigation: Method for Assessing Impact of Odor

The importance of cannabis odor mitigation is very well understood, and we shall make decisions that best prevent the issue of odor to the surrounding areas. If odors are detected outside the facility, this plan shall serve as a guideline to provide corrective action.

The manager/supervisor of the Facility shall assess odors on a daily basis (see *Monitoring* for expanded responsibilities).

Monitoring

The manager/supervisor shall assess the on-site and off-site odors daily for the potential release of objectionable odors. The manager/supervisor on duty shall be responsible for assessing and documenting odor impacts on a daily basis.

The closest adjacent businesses include;

- Pristine Auto Detail: 1620 Piner Road, Santa Rosa, CA 95403
- Caesar's Tropical Fish Factory: 1648 Piner Road, Santa Rosa, CA 95403
- Santa Rosa Computers: 1651 Piner Road, Santa Rosa, CA 95403

Mitigation

Should objectionable off-site cannabis odors be detected by the public and we are notified in writing, the following protocols will take place immediately:

- Investigate the likely source of the odor.
- Utilize on site management practices to resolve the odor event.
- Take steps to reduce the source of objectionable odors.
- Determine if the odor traveled off-site by surveying the perimeter and making observations of existing wind patterns.
- Document the event for further operational review.

If employees are not able to take steps to reduce the odor-generating source, they are to immediately notify the facility manager, who will then notify the BO/O. All communication shall be documented, and the team shall create a proper solution, if applicable. If necessary, we shall retain our certified engineer to review the problem and make recommendations for corrective action/s.

Staff Training

All employees shall be trained on how to detect, prevent and remediate odor outside our facility and all corrective options outlined herein.

Odor Detection Documentation

The Odor Detection Form (ODF) shall be provided to those who suspect objectionable odors emanating from inside the facility. ODFs are available per request, on-site.

We shall maintain records of all odor detection notifications and/or complaints that will include the remediation measures employed. The records shall be made available to the AHJ or the general public on request. All requests shall be in writing (email is acceptable).

Odor Detection Form

Name of Reporting Party:

Phone Number:

Email Address:

Date:

Time:

Location of Odor:

Weather Conditions:

Date/Time of Notification:

Notification Method:

☐ Email ☐ Online ☐ In Person

Administrative Use Only

Mitigation Response Taken:

Date/Time Measures Employed:

Were Mitigation Measures Successful?

Signature/Date/Time:
