

15000 INC.

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August 15, 2018

To Whom It May Concern:

We have reviewed the attached odor mitigation plan, dated August 15, 2018, for MAR SR of 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

August 15, 2018

MAR SR

3075 Coffey Lane
Santa Rosa, CA 95403

Report prepared by

15000 Inc.
2901 Cleveland Avenue, Suite 204
Santa Rosa, CA 95403

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, Robert Blay of MAR SR. (the “Applicant”), will nonetheless maintain a high standard for the air quality plans for all aspects of its proposed Cannabis Type-7 Manufacturing Facility at 3075 Coffey Lane (“Facility”).

Generally, the Applicant will meet and/or exceed the standards set by the City of Santa Rosa (“City”) Cannabis Ordinance, the Sonoma County (“County”) Code (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(b)2], mechanical ventilation must meet 0.15 cubic feet per minute (“CFM”) per square foot of conditioned floor area in support spaces not intended for primary and/or post processing functions. 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: Secure product storage; Type-7 Manufacturing, Administrative processing areas; Product packaging; Secure intake. The company will provide packaging 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 extraction, storage, product packaging administrative and intake areas will be connected to exhaust air systems and terminated through the roof via exhaust fans with activated carbon filters for odor control, and will be located not less than ten feet from adjacent property lines.

Air Pressure & Carbon Filter Control

The Facility will be kept under negative pressure by means of an exhaust system with carbon filters for odor mitigation. The exhaust discharge shall be designed with a high velocity outlet to eject the exhaust up and away from any neighbors or pedestrian traffic.

Best Available Technology

The combination of activated carbon exhaust air filtration and building pressure control represent the current best available technology. This building shall be provided with MERV-8 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 to 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.

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;

- Motor Brake & Wheel / 2111 Bluebell Dr., Santa Rosa, CA 95403
- Maya Smog Repair / 3077 Coffey Lane, Santa Rosa, CA 95403
- Rare Rock Mosaic Museum / 3094 Coffey Lane, Santa Rosa, CA 95403
- Mp Motorsports & Marine / 2123 Bluebell Dr., 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:
