

ODOR MITIGATION PLAN: EXHIBIT E

15000 INC.

170 todd road #900c
santa rosa, ca 95407
phone: 707.577.0363
fax: 707.577.0364

February 28, 2021

City of Santa Rosa

May 21/2021

**Planning & Economic
Development Department**

To Whom It May Concern:

We have reviewed the attached odor mitigation plan, dated February 28, 2021, for Brueggen Holdings, Inc. 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

EXHIBIT E

ODOR CONTROL & MITIGATION PLAN

February 28, 2021

Brueggen Holdings, Inc.

374 Yolanda Avenue
Santa Rosa, CA 95404

Report prepared by

15000 Inc.

(707) 577-0363

info@15000inc.com

EXHIBIT E

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, Padraic Fahey of Brueggen Holdings, Inc. (the “Applicant”), will nonetheless maintain a high standard for the air quality plans for all aspects of its proposed Cannabis Cultivation (Type 1A & Type 4), Distribution (Type 11) and Manufacturing Level 1, Non-Volatile (Type 6). Business operations will take place at 374 Yolanda Avenue, Santa Rosa, CA (“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 fresh air ventilation must meet a minimum of 0.15 cubic feet per minute (“CFM”) per square foot of conditioned floor area. 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.

EXHIBIT E

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 on site functions: Distribution Space including Secured Storage, Non-volatile Manufacturing Area, and Indoor Cultivation Space made up of multiple grow rooms. 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 various HVAC systems serving spatial uses listed in the subsequent section will be tied into their respective exhaust fan systems with activated carbon filters for odor control. Exhaust shall terminate at a minimum of 10'-0" from property lines and fresh air intakes into the building.

EXHIBIT E

Air Pressure & Carbon Filter Control

The Distribution Area and Distribution Secure Storage shall be provided with a recirculation fan and filter within the room (or located above with ducted air outlets) to minimize odors within the space. As these spaces are all interior (no exterior wall), negative pressure is not required to be maintained within via an exhaust air system, as the adjacent (exterior) spaces will be kept at negative pressure safeguarding against the release of nuisance odors.

The non-volatile manufacturing room will be kept at 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 up and away from any neighbors or pedestrian traffic.

The cultivation rooms will be kept at neutral pressure and the freely communicating/adjacent hallway spaces will be kept under negative pressure by means of an exhaust system with activated carbon filters for odor mitigation. The exhaust shall discharge at the roof level to discharge the exhaust away from any neighbors or pedestrian traffic.

Each filter will be provided with a magnehelic differential pressure gauge, Dwyer Series 2000 (or equal) to measure the pressure drop across the filter, with initial and final filter set points marked to indicate useable lifespan of the filter. The Applicant shall adhere to the manufacturer's listed guidelines for filter replacement.

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

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. Backdraft dampers shall be provided in the fresh air duct main to further minimize the release of odors if system(s) are not in use.

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.

EXHIBIT E

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.

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;

- Autokraft Transmission and Automotive: 400 Yolanda Avenue #F, Santa Rosa, CA 95404
- Galvin Precision Machining Inc.: 404 Yolanda Avenue, Santa Rosa, CA 95404
- Malm Fireplace Center: 368 Yolanda Avenue, Santa Rosa, CA 95404

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.

EXHIBIT E

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).

EXHIBIT E

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: