



Odor Mitigation Requirements

CANNABIS LICENSE TYPE-1A, 1B, 2A, 2B, 3A, 3B, 6, and 7

Directions: Applicant shall fill out template, indicate location and inclusion of supporting documents and requirements. Supporting documents shall be appended to this template. Attachments for plans shall be in PDF format, 42"x30" maximum and a minimum scale of 1/8" per 1'-0". Responses missing information or attachments will be returned without review.

ABSTRACT

The City of Palm Springs, in response to community concerns of nuisance odors derived from permitted cannabis activities, has developed the following procedures and methodologies to reduce the occurrence of nuisance odors, create a performance-based approach to minimize such odors, and to create a performance-based enforcement methodology.

The Applicant shall demonstrate compliance to the procedures as outlined in the Odor Mitigation Compliance Template.

BACKGROUND

In general, non-toxic odors are not regulated by Federal, State or Local Governments. The Environmental Protection Agency (EPA) regulates the discharge of six elements to the atmosphere: carbon dioxide, lead, nitrogen dioxide, ozone, particulate matter and sulfur dioxide.

At the state level, the Southern California Air Quality Management District (SCAQMD) determines and enforces the limits of "emissions" generated through combustion and odor-issues related to hydrogen sulfide. All submitted information shall comply with all City of Palm Springs Cannabis Related Business Ordinances and Regulation which can be found here: <https://www.palmspringsca.gov/city-services/cannabis-cooperative-or-collective>

FACILITY & APPLICANT INFORMATION

Facility Name:	FACILITYNAME
Facility Street Address:	ADDRESS1
Facility Street Address:	ADDRESS2
Accessor's Parcel Number:	000-0000-000
Cannabis License Type:	TYPE-1A, 1B, 2A, 2B, 3A, 3B, 6, 7
Description of Activities:	PROVIDE OVERVIEW OF CANNABIS LICENSE TYPE, WORKFLOW, STANDARD OPERATING PROCEDURES AND ANY UNIQUE BUILDING ELEMENTS THAT DESCRIBE CANNABIS RELATED ACTIVITIES
Hours of operation:	00:00 – 00:00
Hours open to the public:	00:00 – 00:00
Applicant Name:	APPLICANTNAME
Applicant Street Address:	APPLICANTADDRESS1
Applicant Street Address:	APPLICANTADDRESS2
Applicant Primary Phone:	APPLICANTPHONE1
Applicant Secondary Phone:	APPLICANTPHONE2
Applicant Email:	APPLICANTEMAIL
Business License Application Number:	APPLICATIONNUMBER

DOCUMENTS TO SUBMIT

The following documents are required for intake and submittal. All submittals without required documentation will be returned without review.

- City of Palm Springs “Odor Control Requirements” template, filled out (this document).
- Facility floor plan indicating items required in Sections 1.0, 2.0 and 3.0 (**Attachment #1**).
- Commissioning Plan complete with OPR, BOD and FPT requirements (**Attachment #2**).
- HVAC Plan demonstrating compliance with required information in Section 2.0 (**Attachment #3**).

DEFINITIONS

Anteroom	<i>Room within the subject building, directly adjacent to process areas intended for gowning, air treatment and pressure regulation.</i>
Basis of Design	<i>A written response to Owners Project Requirements that provide well-defined project requirements consisting of statements that form the basis of inspection and acceptance criteria.</i>
Odor Generating Activity	<i>Any cannabis related growing or processing activity that would reasonably result in an increase of naturally occurring cannabis odors.</i>
Owner’s Project Requirements	<i>A written document detailing the functional requirements of a project and the expectations of how it will be used and operated.</i>
Process Area/Room	<i>Areas of the building normally expected to have cannabis plants as part of the day-to-day operations.</i>

1.0 BUILDING & ENVELOPE REQUIREMENTS

Building shall be designed and constructed to the following minimum standards:

- Provide facility floor plan (**Attachment #1**).
Indicate drawing number: _____.
- Highlight location of odor-generating activities (by room) on the Drawings. This shall include, but not be limited to; mother, cloning, vegetation, flowering, harvesting, trimming, production, post-production, process and manufacturing activities.
Location on plans: _____.
- Provide continuous exterior insulation per *2019 Building Energy Efficiency Standards, Subchapter 3, Section 120.7*. Identify wall/roof types with required and specified continuous insulation types.
Location on plans: _____.
- Building envelope shall be provided with exterior doors compliant with *2019 California Green Building Standards Code, Section A5.205.1.1.1 Air Leakage*.
Location on plans: _____.
- Windows shall not be permitted on exterior walls of process areas.
- Building shall comply with the following *2019 California Green Building Standards Code, Non-Residential Sections Title 24, Part 11*):
 - Section *A5.205.1.1.1 Air Leakage*. Manufactured exterior doors shall have an air filtration rate not exceeding 0.3 cfm/ft² of door area of nonresidential single doors.
Location on plans: _____.
 - Section *A5.205.2*. Joints and other openings in the building envelope that are potential sources of air leakage shall be caulked, gasketed, weather-stripped or otherwise sealed to limit infiltration and exfiltration.
Location on plans: _____.
 - Section *A5.205.3.5 Placement of roof/ceiling insulation*. Insulation installed to limit heat loss and gain through the top of conditioned spaces shall comply with *A5.205.3.5.1, .2, & .3*.
Location on plans: _____.
 - Section *A5.407.3 Weather Protection*. Provide a weather-resistant exterior wall and foundation envelope as required by *California Building Code Section 1403.2* and *California Energy Code Section 150*, manufacturer's installation instructions or local ordinance, whichever is more stringent.
Location on plans: _____.
 - Submit Commissioning Plan per *2019 California Green Building Standards Code Section 5.410.2 Commissioning* and all sub-sections. Note: 10,000 sf requirement does not apply for this application (**Attachment #2**).

Commissioning Plan (Per *2019 California Green Building Standards Code*) shall include the following:

- Owner's Project Requirements (OPR) per *Section 5.410.2.1*.
- Basis of Design (BOD) per *Section 5.410.2.2*.
- Commissioning Plan (CxP) per *Section 5.410.2.3*.
- Functional Performance Testing (FPT) per *Section 5.410.2.4*.

2.0 HEATING, VENTILATING AND AIR CONDITIONING (HVAC) REQUIREMENTS

HVAC systems shall be designed and constructed to meet the following minimum standards. Provide plan indicating compliance to the following (**Attachment #3**):

- Provide anteroom for process rooms. Process rooms shall be provided with a directly adjacent anteroom for building pressure stabilization and containment. Anterooms may serve more than one process area.
Location on plans: _____.
- Air-moving equipment serving process rooms shall be located within the envelope of the space it serves.
Location on plans: _____.
- Document the required ventilation air for each process room on the plan. Quantity shall be per [2019 California Energy Code, Section 120.1 – Requirements for Ventilation](#). Document CFM for each room on the Drawings (required and provided CFM).
Location on plans: _____.
- Required relief from process rooms (positive pressure resulting from ventilation air) shall be taken from the coldest part of the room (6" above finished floor).
Location on plans: _____.
- Required relief from process rooms shall be routed to anteroom for pressure regulation and filtration. Refer to **FILTRATION & PRESSURIZATION** for additional information.
Location on plans: _____.
- Required emergency CO2 evacuation from process areas shall be provided with actively closed discharge ductwork, complete with low-leakage dampers and comply with [2019 California Fire Code Section 5307.4.4](#).
Location on plans: _____.

3.0 FILTRATION & PRESSURIZATION

Filtration systems shall comply with the following:

- Anteroom shall be negatively pressurized (minimum 5% - maximum 10%) in relation to all adjacent rooms. Indicate on HVAC plans.
Location on plans: _____.
- 100% of all positively pressurized air within building shall terminate within anteroom for filtration.
Location on plans: _____.
- 100% of all positively pressurized air within anteroom shall be routed through an activated carbon filter.
Location on plans: _____.
- Activated carbon filter assembly shall be provided with MERV-13 pre-filter.
Location on plans: _____.
- Activated carbon filter shall be sized at a maximum velocity of 450 feet per minute (FPM) and provide a minimum of 45 lbs per 1000 CFM of discharge air at a maximum pressure drop (fully loaded) of 1.50" external static pressure.
Location on plans: _____.
- Activated carbon filter shall have a documented breakthrough rate of less than 10% at full loading.
Location on plans: _____.

- Exhaust air downstream of activated carbon filtration shall discharge directly to the exterior and dilution fan.
 Location on plans: _____
- Provide filter replacement schedule on the drawings in accordance with Manufacturer's recommendations for quantity of ventilation airflow and replacement carbon.
 Location on plans: _____

4.0 DILUTION & DISCHARGE

100% of air discharged to the exterior shall be provided with the following dilution ratios:

- 100% of all air discharged to the exterior shall be diluted to a 7:1 ratio of clean, atmospheric air to building discharge air *(for every 100 CFM of discharged building air, 700 CFM of clean atmospheric, non-building air shall be induced into the airstream prior to or at discharge)*.
 Location on plans: _____
- Air discharge locations on the building shall comply to [2019 California Mechanical Code Section 502.2.2](#) for distances to property lines, openings, etc. Discharge air is not to be considered environmental air.
 Location on plans: _____

5.0 ADMINISTRATIVE CONTROLS

Facility staff shall be trained in site-specific odor-mitigating procedures, policies and practices herein and attached in response. Provide for the training and documentation of the following:

- Staff Training:** Describe the organizational responsibilities and the role of the staff members who will be trained about odor control/mitigation for this specific application.
 Location on plans: _____
- Recordkeeping:** Describe the process and procedure for receiving and responding to public complaints specific to odor-mitigating procedures and practices.
 Location on plans: _____