Enforcement Symposium
October 4, 2019
Cannabis Industry
Allowed Cultivation

Outdoor

Indoor
Commercial Manufacturing and Testing
Permitting

- Identifying Cannabis Stationary Sources
  - Building and Planning Departments
  - Surveillance
  - Interagency Working Groups
- District Outreach and Follow-Up
  - Circle Back Periodically
- Currently three permitted manufacturing facilities
  1. (2) Propane/Butane Extraction
  2. (1) CO$_2$ Extraction w/ Ethanol Filtration & Vacuum Distillation
  3. Solvent Cleaning
Extractors

Emotek OBE  ETS MiniMEP  Eden Labs HiFlo
Permitting Issues

- Application detail, or lack thereof
- District unfamiliarity with the process
- Changes discovered during start-up inspections
  - Additional equipment/processes
  - Solvent Cleaning
- Confidentiality Concerns
  - No Photos
- Recordkeeping
Cultivation

- Exempt from District Permitting Requirements
- Engines may need District Registration
- Odor – Local Planning agency – CUP
- Agricultural Burning

Previous non-Cannabis crop residue
NO BURNING CANNABIS WASTE
Lessons Learned

- Work with the planning agencies
- Contact possible sources and explain requirements
- Conduct surveillance inspections
- Circle back
- Ask questions and try to understand the process
- Discuss emissions and recordkeeping early in the permitting process
Questions

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