Odor Control/
Air Quality Plan
BHCC LLC
# Introduction

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Introduction

This Odor Control Plan is designed to explain BHCC LLC process for mitigating odors generated by the cultivation of cannabis, so that a reasonable person of normal sensitivities cannot detect odors outside the building.

This procedure explains the structural, mechanical, and operational measures employed by BHCC LLC to maintain odor control. These measures pertain to cultivation, harvesting, trimming, and storing cannabis. The measures also include building design and equipment use.

All personnel are required to implement this odor control procedure in the normal course of their work. Employees are also responsible for detecting and reporting odor control problems to the Cultivation Manager, who will forward information to the Facilities Manager.

The Cultivation Manager is responsible for ensuring that cultivation personnel are trained to properly execute this odor control procedure. The Cultivation Manager is also responsible for correcting any physical or operational deficiencies involved with the handling or processing of cannabis that result in the release of odors from the building where cultivation occurs.

The Facilities Manager is responsible for ensuring that any non-cultivation employees who work on odor control equipment are properly trained in the maintenance and use of such equipment. He/she is also responsible for correcting and monitoring any equipment-related malfunctions that result in the release of odors.

Procedures

Implementation Timeline

Upon receiving approval from the regulating authority to be licensed as a cultivator, BHCC LLC will begin the following activities:

| Design of the odor control system | Complete drawings and submit to regulating authorities for approval |

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<table>
<thead>
<tr>
<th>Action</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase equipment and begin installation</td>
<td>Begin installation within [1 month] of receiving approval of system drawings from regulating authorities.</td>
</tr>
<tr>
<td>Request inspections and approvals from regulating authorities</td>
<td>Request within [one week] of having installation completed</td>
</tr>
<tr>
<td>Update Odor Control/Air Quality Plan as needed to meet any additional requirements identified during the above process</td>
<td>Prior to hiring and training employees</td>
</tr>
</tbody>
</table>

BHCC LLC will not begin any cultivation activities until all applicable inspections have been completed and approvals received.

Location of Cannabis Odor Emissions

Odor eliminating activities occur in the following locations inside the facility. (See Appendix 1 for a detailed floor plan with labels):

1. Cultivation areas where live plants are growing (labeled as “Cultivation” on floor plan),
2. Harvesting areas (labeled “Harvesting”),
3. Processing areas (labeled “Processing”),
4. Areas used for storage of harvested cannabis (labeled “Storage”), and
5. Locations of doors, windows, fans, filters and vents. Each location will be physically labeled with a code that matches its label on the floor plan. This code will be used when logging maintenance or other equipment-specific activities.

Specific Odor Emitting Activities

1. Cultivation – Live plants emit natural odors, which increase throughout the life cycle of the plant.
2. Harvesting – Mature cannabis plants emit odors during the process of being cut for harvest.
3. Processing – Trimming, curing, cooking, extracting and packaging cannabis causes odors to be emitted.
4. Storage – Stored cannabis may emit odors if it is not tightly sealed, or if the storage containers are opened for any reason.

Intensity of Odor Emitting Activities

<table>
<thead>
<tr>
<th>Stage/Activity</th>
<th>Odor Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plants Prior to Flowering</td>
<td>Low</td>
</tr>
<tr>
<td>Flowering plants</td>
<td>High</td>
</tr>
<tr>
<td>Harvesting</td>
<td>High</td>
</tr>
<tr>
<td>Curing</td>
<td>High</td>
</tr>
<tr>
<td>Trimming</td>
<td>High</td>
</tr>
<tr>
<td>Packaging</td>
<td>Medium</td>
</tr>
<tr>
<td>Storage</td>
<td>Low</td>
</tr>
</tbody>
</table>

Operational Mitigation Measures

All personnel will be trained on this procedure and any additional training topics deemed necessary by the Cultivation Manager. Records related to odor mitigation training will be kept in accordance with the Record Keeping Plan.

The Cultivation Manager Nevada Ellison is responsible for periodically monitoring odors outside the building in which cannabis is being cultivated, particularly when activities that produce a high level of odor emission are in progress. Odors that can be detected by a reasonable person of normal sensitivity should be reported, recorded, and corrected in accordance with this procedure.

Handling

Cannabis plants and harvested materials should be handled as gently and infrequently as possible to minimize odor emission.
Curing

Harvested material will be cured in a cool, dark, and properly ventilated area. The air exhausted from the curing area will be scrubbed and treated using HEPA [or equivalent] filtration.

Storage

All dried and cured material that is not being processed will be stored in sealed non-porous plastic bags, in glass jars, or in other airtight containers approved by the Cultivation Manager. Doors to each storage area will remain closed and locked except when cannabis is being transferred in or out of the area.

Processing

Cured material will be trimmed and packaged over as short a duration as possible to minimize its exposure to the air.

Physical Measures

The Facilities Manager is responsible for ensuring the equipment related to the odor control system is functioning properly on a day-to-day basis.

Negative Air Pressure

A combination of intake fans and exhaust fans are used continuously to create negative air pressure inside the main perimeter of the building. This results in air being pulled in through any openings and cracks around the building, rather than positive pressure, which would push potentially odorous air outward.

- The primary intake fans are [12" Max Fans, Model EL 012-E201], which bring outside air into the facility through [MERV 11 filters].
- Five to ten internal room-to-room circulation fans move air throughout the facility starting in the veg and clone room and ending in the flower room where the most air purification will be required. The Drying and curing room will be on its own air
system to ensure quality drying and curing conditions. The air movement fans are [8" Max Fans, Model EL 012-E201].

Exhaust

Air exits the individual rooms and the facility through separate exhaust fans of sufficient capacity to ventilate the entire interior. In the case of the main inside perimeter of the building, the exhaust fans have a higher capacity than the intake fans, creating negative air pressure. This prevents odor-containing air from exiting the building through cracks or doors.

The cultivation, trimming, drying and storage rooms are designed with positive pressure, such that insects, molds, bacterial and fungal spores are deterred from entering rooms where product quality could be negatively affected. The intake fans in these rooms have a higher capacity than the outtake fans to create positive air pressure.

Filtration

All air leaving the building and the cannabis product-containing rooms passes through an activated charcoal filter [for receives ozone or other equivalent treatment]. The filtration system uses [thirteen 12" Uvonair] fans to scrub air before it is released from the facility. There will be up to 10 Airganics Airbugz filtration units [800&2200] for stand alone air filtration throughout the facility.

Doors and Windows

All exterior doors and windows remain closed when not in use, and no windows are used for routine ventilation. This prevents accidental or unnecessary odor emissions. Similarly, interior doors to areas used for cultivation, processing, and storing cannabis remain closed when not in use. Internal doors will be equipped with spring-loaded auto-closing systems so they cannot inadvertently be left open.

System Maintenance
Schedule

The equipment used for odor mitigation will be inspected on a schedule determined by the Facilities Manager, consistent with manufacturer's guidelines, and/or whenever personnel or visitors detect a problem with odor control. The Cultivation Manager is responsible for developing a reminder protocol to ensure activities are carried out in a timely manner. Equipment to be inspected will include:

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Responsible Personnel</th>
<th>Frequency</th>
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<tbody>
<tr>
<td>Exhaust fans in work areas</td>
<td>Facilities Manager or trained designee</td>
<td>Weekly</td>
</tr>
<tr>
<td>Exhaust fans outside work areas</td>
<td>Facilities Manager or trained designee</td>
<td>Weekly</td>
</tr>
<tr>
<td>Ozone generator</td>
<td>Facilities Manager or trained designee</td>
<td>Weekly</td>
</tr>
<tr>
<td>Ventilation ducting</td>
<td>Facilities Manager or trained designee</td>
<td>Monthly</td>
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<tr>
<td>Activated charcoal filter</td>
<td>Facilities Manager or trained designee</td>
<td>Every 6 months</td>
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Equipment Maintenance Log

The Facilities Manager or a trained designee will maintain an equipment maintenance log for all equipment related to odor control. The log will be maintained according to the Record Keeping Plan. See Appendix 2 for the Odor Control Equipment Maintenance Log. At a minimum, logs will contain:

1. Specific identification of the equipment inspected using the code on the floor plan;
2. The date of the inspection;
3. The name of the personnel conducting the inspection;
4. Clear notes about the condition of the equipment; and
5. What action, if any, the inspector carries out to correct or report a malfunction.
Responding to Complaints

Any complaint of cannabis odor escaping the building will be documented on a form or in a manner prescribed by the Cultivation Manager. Completed forms will be forwarded to the Record Keeping Manager. See Appendix 3 for the Odor Complaint and Response Tracking form. The form or documentation will contain, at a minimum:

1. The date and time of complaint
2. The name of the employee reporting the odor problem
3. The name and contact information of the person who noticed the odor if not an employee, if he or she chooses to disclose that information
4. The date, time, and frequency of the noted odor emission
5. The distance from the building that the odor can be detected or approximate location of odor detection
6. The outcome of the inspection of the incident, including confirmation of no further odors outside and fully effective odor control equipment and procedures
7. The nature and date of any corrective action that was taken in the course of the inspection

Resolution

An odor complaint is considered resolved when:

1. The Cultivation Manager confirms that the issue has been effectively inspected and any necessary corrective actions have been taken, or the Cultivation Manager determines that there was no odor escaping from the building that could be detected by a reasonable person of normal sensitivity
2. The equipment maintenance log and complaint response documentation is complete and filed
3. Any official enforcement action is completed or resolved to the satisfaction of the agency or department initiating the action, if applicable

Mandatory Notification

The Cultivation Manager will notify the executive staff of the company of any citation, notice, warning or other official communication alleging a nuisance activity or other violations related to odor within 2 hours of learning of or receiving such communication.
Appendix 1
Map of Facility Showing Locations of Odor Control Equipment
Appendix 2

Odor Control Equipment Maintenance Log

Maintenance Frequencies (equipment code)
**Weekly**: Exhaust fans (EF), ozone generator (OG)  **Monthly**: Ventilation (Vent)
**Twice yearly**: Activated charcoal filter (ACF)

Calendar showing maintenance schedule
Map showing all equipment locations with code labels

<table>
<thead>
<tr>
<th>Date</th>
<th>Equip Code</th>
<th>Room/Loc</th>
<th>Check if Normal</th>
<th>Describe Problem (use as many rows as needed)</th>
<th>Describe Action</th>
<th>Check when Fixed</th>
</tr>
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Submit a copy of this completed form to the Facilities Manager and the Record Keeper.
Appendix 3
Odor Complaint and Response Tracking

1. Date of Complaint: ____________________ Time of Day: ________________

2. Name of Employee Recording Complaint: ____________________________

3. If an employee noticed the odor, skip to item 8.

4. If the complaint is made by someone other than an employee, provide his/her contact information here if they would like to provide it ____________________________

5. Describe when and how often the odor is detected (days of the week, mornings/afternoons, particular day and time, frequency) or if it was a single instance: ____________________________

6. From what address, general location, or distance from the building is the odor being detected? ____________________________

7. Does the person making the complaint wish to be contacted by a supervisor? Yes ______ No ______

8. Describe the exterior locations where odor emissions could be detected by an employee and/or mark the locations on an attached facility or premises map. ____________________________

9. List equipment/locations checked to identify areas through which odor may be escaping. (Locations may be marked on an attached facilities map.) ____________________________

10. List results of inspections (location of problem, type of equipment problem). 

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11. List maintenance, repairs, other actions taken to resolve the problem.


12. Check below once this issue is considered resolved according to the Odor Control Plan and all relevant parties have been notified of the actions taken, including the individual making the complaint, if indicated in Item 7 above.

Complaint resolved: ____________________ Date: ____________________

Name / Signature of Manager resolving complaint:

_________________________________ / ____________________________________

Additional Notes:

Submit a copy of this completed form to the Nevada Ellison and the Record Keeper.