

Odor Control Plan

Objective: The primary objective of this Odor Control Plan is to ensure compliance with the Village of Pinckney's environmental performance standards outlined in Section 152.371, specifically regarding odors. This plan aims to prevent the emission of noxious odors that are perceptible at any point along the property line.

1. Odor Mitigation Measures:

A. Facility Design and Construction:

Our facility will be equipped with an advanced HVAC system that includes industrial-grade carbon filtration units, air scrubbers, and odor-neutralizing equipment. These systems will work in tandem to capture, filter, and neutralize odorous compounds from the air.

Airlocks and negative pressure zones will be installed at key points within the facility, minimizing the risk of odor escape during ingress and egress.

We will regularly maintain and inspect the ventilation and filtration systems to ensure they are operating at optimal efficiency.

B. Standard Operating Procedures (SOPs):

Comprehensive Standard Operating Procedures (SOPs) will be developed and strictly followed for all operations, from cultivation to processing and packaging. These include:

1. Cultivation SOPs:
 - a. Proper Handling of Cannabis Plants: Detail how employees should handle cannabis plants, ensuring that odors are not released during the cultivation process.
 - b. Harvesting and Trimming Procedures: Outline techniques for harvesting and trimming cannabis plants to minimize odor release.
 - c. Waste Management During Cultivation: Explain how plant waste will be managed, stored, and disposed of to prevent odors from escaping.
2. Processing SOPs:
 - a. Extraction and Manufacturing Protocols: Describe the procedures for extracting and processing cannabis to minimize odors.
 - b. Packaging and Sealing Guidelines: Specify how cannabis products will be packaged and sealed to prevent odor leakage.
 - c. Cleaning and Sanitization Procedures: Ensure that cleaning protocols do not introduce odors into the facility.
3. Waste Management SOPs:
 - a. Odor-Sealed Waste Containers: Detail how waste, especially cannabis plant trimmings and other organic materials, will be collected and stored in odor-sealed containers.
 - b. Waste Handling and Transportation: Describe the process for the removal and transportation of waste to prevent odor emissions during transit.

4. Ventilation and HVAC SOPs:
 - a. Operation and Maintenance of Ventilation Systems: Specify how the facility's ventilation systems will be operated, monitored, and maintained to minimize odor escape.
 - b. Emergency Ventilation Procedures: Outline procedures for increasing ventilation during odor-related emergencies.
 - c. Filter Replacement and Maintenance: Describe the regular replacement and maintenance of carbon filters and air purification equipment to ensure their effectiveness.
5. Employee Training SOPs:
 - a. Odor Control Training: Explain the training program for employees, covering the importance of odor control and the specific procedures they need to follow.
 - b. Reporting Odor Issues: Instruct employees on how to report and respond to odor issues, ensuring prompt action and documentation.
6. Emergency Response SOPs:
 - a. Odor-Related Emergency Protocols: Provide a step-by-step guide for handling odor-related emergencies, including isolating the source, increasing air purification, and notifying authorities.
 - b. Employee Roles and Responsibilities: Clarify the roles and responsibilities of employees during an odor emergency.
7. Complaint Response SOPs:
 - a. Complaint Handling Procedures: Define the process for receiving, investigating, and responding to odor-related complaints.
 - b. Corrective Actions: Specify the steps to take to address the source of the odor and prevent recurrence.
 - c. Documentation of Complaints: Explain how complaints and actions taken will be documented for review by regulatory authorities.

C. Air Quality Monitoring:

The facility will utilize state-of-the-art air quality monitoring equipment with real-time data transmission to track and assess any potential odor issues. Our team will continuously analyze the data, and if any irregularities are detected, corrective actions will be initiated immediately. Records of air quality data will be maintained and made available for inspection.

The various types of equipment we will use is as follows:

- Real-time Gas Chromatography-Mass Spectrometry (GC-MS): We will install real-time GC-MS equipment within our facility to continuously monitor the air for specific volatile organic compounds (VOCs) associated with cannabis odors. This high-precision technology allows us to identify and quantify odorous compounds in real-time.
- Electronic Nose (E-Nose): An E-Nose is an array of gas sensors that can detect and distinguish various volatile organic compounds. It provides a rapid

assessment of odor profiles and can trigger alerts when specific odor thresholds are exceeded.

- **Data Loggers and Sensors:** In addition to real-time monitoring equipment, we will deploy data loggers and sensors at strategic points within the facility. These devices continuously measure temperature, humidity, and airflow to help us assess the conditions that influence odor dispersion.
- **Weather Stations:** External weather conditions can affect odor dispersion. We will have weather stations that provide real-time data on wind speed and direction, temperature, and humidity to better understand the potential impact on odor movement.

Types of data analysis:

- **Real-time Alerts:** Our monitoring systems will be set up to trigger real-time alerts if specific odor thresholds are reached or if unusual patterns are detected. These alerts will immediately notify designated personnel responsible for odor control.
- **Historical Data Analysis:** In addition to real-time monitoring, we will collect and archive historical data. This data will be analyzed regularly to identify trends and potential issues, even before they become significant.

D. Waste Management:

Cannabis waste, including trim and other plant material, will be collected and stored in odor-sealed containers designed for this specific purpose.

The waste storage area will be equipped with active ventilation and specialized air purification systems to prevent the release of odors into the surrounding environment.

Waste containers will be regularly emptied, and the waste removal process will follow stringent odor control procedures.

2. Odor Complaint Response: In the event of a complaint related to odors originating from our facility, we will:

- Assign a designated employee as the odor control response manager to lead the investigation.
- Conduct an immediate and thorough investigation to identify the source of the odor, employing both manual inspection and the data from air quality monitoring equipment.
- Initiate corrective actions, such as adjusting ventilation, sealing containers, or increasing air purification efforts.
- Document the complaint, investigation, and actions taken, maintaining these records for future reference.
- Provide a written response to the complainant, outlining the actions taken to address their concerns.

3. Reporting:

We will provide the Village of Pinckney with regular reports (quarterly) that include air quality monitoring data, corrective actions taken, and updates on waste management practices.

All reports will be compiled and submitted in a format specified by the local regulatory authority, ensuring transparency and compliance with odor control standards.

4. Training:

Training on odor control measures will be an integral part of our comprehensive employee onboarding program. Ongoing training sessions will be conducted at regular intervals to reinforce the importance of odor control and ensure that all employees remain knowledgeable and compliant. Records of training sessions will be maintained to demonstrate adherence to these standards.

Specifically, we will have:

- Employee Onboarding:
 - All new employees will undergo a comprehensive onboarding program that includes a dedicated section on odor control.
 - During onboarding, employees will receive detailed training on:
 - The importance of odor control in compliance with Village of Pinckney regulations.
 - Procedures for minimizing odors in their specific roles, whether in cultivation, processing, or other operational areas.
 - Proper handling and disposal of waste materials to prevent odor escape.
 - Recognizing and reporting odor-related issues and the escalation process for odor complaints.
- Ongoing Training:
 - To ensure that odor control remains a top priority, regular training sessions will be conducted for all employees, both as part of mandatory compliance training and as part of routine refresher courses.
 - These sessions will provide updates on any changes to odor control procedures, regulations, and the latest industry best practices.
- Training Records:
 - Records of all training sessions, including employee attendance and participation, will be meticulously maintained.
 - These records will be made available for review by regulatory authorities upon request as evidence of our ongoing commitment to employee education on odor control.

5. Emergency Procedures:

We will establish clear emergency procedures to address and contain any unexpected release of odorous substances. In case of an emergency, employees will be trained to follow specific protocols, such as isolating the source of the odor and increasing air purification efforts. We will establish a direct line of communication with local authorities to promptly notify them of any significant odor emergency. Regular drills and exercises will be conducted to ensure employees are well-prepared for handling odor-related emergencies.

Note:

- Odor-Related Emergencies:
 - Odor-related emergencies are situations where the control of odors is compromised and may result in perceptible odor issues off-site.
 - Employees will be trained on specific procedures to follow during odor-related emergencies, including but not limited to:
 - Immediate isolation of the source of the odor.
 - Escalating air purification efforts, including increasing the ventilation rate.
 - Notifying designated personnel responsible for odor control.
 - Documenting the emergency, actions taken, and follow-up measures.
- Communication with Local Authorities:
 - We will establish a direct line of communication with local authorities to promptly notify them in the event of a significant odor emergency.
 - Designated personnel will have the contact information for local environmental and regulatory agencies and will be trained on the specific protocols for notification and collaboration during such emergencies.
- Emergency Drills:
 - Regular emergency drills and exercises will be conducted to ensure that employees are well-prepared to handle odor-related emergencies.
 - These drills will include scenarios that simulate various odor issues, allowing employees to practice their response procedures and coordination.
- Employee Roles and Responsibilities:
 - Employees will be informed of their roles and responsibilities during odor-related emergencies, ensuring clear and efficient coordination.
 - Each employee will be aware of their specific duties, whether it is taking corrective actions, notifying authorities, or assisting in the investigation and resolution of the emergency.

These additional details in the Training and Emergency Procedures sections enhance our ability to train employees comprehensively in odor control measures and ensure that our response to odor-related emergencies is well-organized and effective. The emphasis on ongoing training, clear communication, and emergency drills strengthens our commitment to minimizing and managing odors in accordance with the Village of Pinckney's regulations.

Conclusion: Our cannabis operation is committed to adhering to the environmental performance standards set by the Village of Pinckney, including those related to odor control. We have detailed and robust procedures in place to minimize odor emissions and promptly address any complaints or issues related to odors.