
**PROPERTY MANAGEMENT PLAN
FOR THE CANNABIS CULTIVATION OPERATION AT
1000 & 1270 HIGHWAY 53, CLEARLAKE, CALIFORNIA**

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Applicant:
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Prepared for:
County of Lake

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1.0 INTRODUCTION

This Property Management Plan has been prepared to fulfill the requirements of **Ordinance No. 3073, an Ordinance Amending Chapter 21, Article 27 of the Lake County Code Pertaining to Cannabis Cultivation**.

This Property Management Plan, and all the sub-plans, have been prepared using the guidance that is listed in Subsection 5 of the proposed amendments to Chapter 21, Article 27 of the Lake County Code. Ordinance No. 3073 describes the Plan as follows:

“All permittees shall prepare a Property Management Plan. The intent of said plan is to identify and locate all existing cannabis and non-cannabis related uses on the property, identify and locate all proposed cannabis and non-cannabis related uses on the property, and describe how all cannabis and non-cannabis related uses will be managed in the future. The property management plan shall demonstrate how the operation of the commercial cannabis cultivation site will not harm the public health, safety, and welfare or the natural environment of Lake County. “

Note that Ordinance No. 3085 modifies and reduces the contents of the Property Management Plan. However, in another part of Ordinance 3084, specifically Section 4, Subsection 2 i (d) (11), it states that the applicant must prepare a “Written Description”:

“A statement of the applicant’s proposal for solid waste disposal, vegetative waste disposal, storm water management, fish and wildlife protection, water resources protection, energy use, water use, pest management, fertilizer use, property management, grading, organic farming, and protection of cultural resources.”

Since these written description requirements are the same contents of the Property Management Plan described in Ordinance No. 3073, the format used for this Plan is the guidance provided by Ordinance No. 3073. Thus, this Property Management Plan fulfills the requirements of both Ordinance No. 3073 and Ordinance No. 3085.

This Plan is intended to be a “living” document, updated as necessary, such that when operational activities or processes are modified or replaced, the applicable sub-plans are revised to reflect these changes. Relevant sub-plans should also be amended whenever the goals of the Plan are not met, whenever a significant pollution event or other non-compliance event occurs, or whenever a violation notice is issued.

2.0 PROJECT LOCATION AND DESCRIPTION

The Lake County Investments, LLC cannabis cultivation operation is located on a 106-acre property on the east side of Highway 53 within unincorporated Lake County, California, approximately 1 mile north of the City of Clearlake. The property consists of 2 parcels: 1000 State Highway 53, 48.6 acres, APN 010-055-27; and 1270 State Highway 53, 56.9 acres, APN 010-055-26. The is accessed from the south or north on Ogulin Canyon Road (see exhibits), which is a gravel road with asphalt sections. There is a large locked gate on Ogulin Canyon Road to the south, and then another locked gate at the entrance to the northern parcel (APN 010-055-27), which provides access to the southern parcel as well. Aside from water supply systems and dirt roads, the Property is undeveloped.

The cultivator is seeking to cultivate five (5) acres of outdoor Cannabis canopy within two distinct areas containing approximately 20 acres of cultivation area within fenced enclosures (approximately 10 acres each). The applicant has already submitted a Major Use Permit application (UP 19-49, EA 19-74, IS 19-71) for cultivation on the northern parcel and cultivation is commencing under Early Activation permitting.

The cultivation operation is designed to have minimal environmental impacts. No grading will be performed, and only light vegetation clearing is needed. Immature trees (under 4 inches in diameter) will be removed, but mature trees will not be removed. Cultivation will occur in individual grow bags filled with imported soil. The existing agricultural water system will be used to irrigate each fabric pot using drip lines. There are two wells, one propane-powered pumphouse, and an 8,000 gallon cement cistern on the northern property. There is one well and an 11,000-gallon cement cistern on the southern property. Poly water tanks, ranging from 500 to 5,000 gallons in size, will be used to store water and mix nutrients.

No permanent structures are planned at this time. There is a mobile office trailer on the north parcel that is used as a security office and for chemical storage. Additional stormproof sheds will be used for chemical storage and equipment storage. Each cultivation compound will have a quarantine area / administrative hold area, as required by CalCannabis: this will consist of secure sheds (approx. 10 by 12 feet in dimensions). Electrical power, to be used for lighting, electrical equipment, and surveillance, will be generated from a photovoltaic array with batteries. PG&E electrical service may also be extended on to the site. Each cultivation compound will be surrounded with a 6-foot tall security fence. Privacy screening may be erected on the west side of the cultivation compounds to screen views from Highway 53, if required by the County.

2.1. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

3.0 GRADING

A Lake County Grading Ordinance (Chapter 30 of the Lake County Code) grading permit needed if volume is 50 cubic yards or more or if 1 acre of native vegetation is cleared. Minor grading will be required to level operation areas, but no fill will be imported. Slopes are about 5% on average in the Project Area. Note that a site management plan developed for this Project contains erosion and sediment control measures that will be implemented.

4.0 AIR QUALITY MANAGEMENT PLAN

4.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Air Quality:

- (a) Intent: All cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District (LCAQMD).*
- (b) In this section permittees shall identify any equipment or activity that which may cause, potentially cause the issuance of air contaminants including odor, and shall identify measures to be taken to reduce, control or eliminate the issuance of air contaminants, including odors.*
- (c) All cannabis permittees shall obtain an Authority to Construct permit pursuant to LCAQMD Rules and Regulations, prior to the construction of the facility described in the Property Management Plan.*
- (d) All cannabis permittees shall obtain Authority to Construct Permit pursuant to LCAQMD Rules and Regulations, if applicable, to operate any article, machine, equipment or other contrivance which causes or may cause the issuance of an air contaminant.*
- (e) All permittees shall maintain an Authority to Construct or Permit to Operate for the life of the project, until the operation is closed and equipment is removed.*
- (f) The applicant shall prepare an odor response program that includes (but is not limited to):*
 - a. Designating an individual(s) who is/are responsible for responding to odor complaints 24 hours per day/seven (7) days a week, including holidays.*
 - b. Providing property owners and residents of property within a 1,000 foot radius of the cannabis facility, with the contact information of the individual responsible for responding to odor complaints.*
 - c. Policies and procedures describing the actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint.*
 - d. The description of potential mitigation methods to be implemented for reducing odors, including add-on air pollution control equipment.*
 - e. Contingency measures to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.*

The following Air Quality Study was prepared for this project and is bound separately:

- Natural Investigations Co. 2019. Air Quality Impact Assessment for the Cannabis Cultivation Operations at for the Cannabis Cultivation at 1000 and 1270 Highway 53, Unincorporated Lake County, California. October 2019

4.2. Air Quality Setting and Potential Pollutant Sources

The project is in the Lake County Air Basin. The Lake County Air Quality Management District (LCAQMD) regulates air quality in Lake County. The U.S. Environmental Protection Agency (EPA) sets acceptable levels for seven air pollutants, and then determines — with the help of states and local air districts — where those standards are or are not met. Lake County currently meets the EPA's health standards for five of those pollutants: carbon monoxide; nitrogen dioxide; sulfur dioxide; lead; and coarse particulates. For the other two — ground-level ozone and fine particulate pollution — Lake County is considered to be a part of a regional non-attainment area. There are no sensitive receptors on the Property. The closest structure, Villa La Brenta, a special event accommodation and winery, is located approximately 2,600 feet south of the cultivation compound.

Short-term grading or construction emissions could include fugitive dust and other particulate matter, as well as exhaust emissions generated by earthmoving activities from operation of tractors, tillers, etc., during site preparation. Construction emissions are caused by onsite or

offsite activities. Onsite emissions principally consist of exhaust emissions (NOX, CO, ROG, PM10, and PM2.5) from heavy-duty construction equipment, motor vehicle operation, and fugitive dust from disturbed soil. Offsite emissions are caused by motor vehicle exhaust from delivery vehicles as well as worker commuter traffic, but they also include road dust (PM10). Vegetation removal and site leveling/grading will be required to develop the 7.5-acre operation area. Construction of a metal building will also require excavation of a cement foundation and pad. A few people using heavy equipment over a period of approximately two weeks will be required for site preparation. Such low numbers of man-hour effort would not generate significant vehicle emissions.

Operational emission sources consist of mobile emissions and area source emissions. Mobile source emissions estimates are derived from motor vehicle traffic from staff commuting. Area source emissions estimates are derived from the consumption of propane, electricity, and consumer products, as well as emissions resulting from landscape maintenance. The cultivation operation requires the use of electricity (to be primarily generated by onsite photovoltaic panels), or other consumer products. Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads.

Operation of the proposed cultivation operation would generate small amounts of carbon dioxide from operation of small engines, such as tillers, and from vehicular traffic associated with staff commuting. The generation of carbon dioxide would be partially offset by the cultivation of fast-growing plants, which remove carbon dioxide from the air for photosynthesis. The proposed cultivation operation would not consume excessive amounts of energy because it is outdoor and will utilize the natural sun for light. A majority of electrical energy used for operational needs would be generated from photovoltaic panels. Backup propane generators maybe used in the case of an emergency.

CDFA (2017) concluded that cannabis cultivation activities under the CalCannabis Licensing Program would not generate a substantial number of vehicle trips and would not require intensive use of heavy equipment, and as such, would not degrade air quality or produce significant amounts of greenhouse gasses. CDFA (2017) summarizes the impacts from small cannabis cultivation operations as follows:

“Despite the potential air quality emission-generating sources described above that are associated with cannabis cultivation activities, it is not anticipated that the Proposed Program would conflict with or obstruct implementation of air quality plans for the numerous reasons outlined below. First, the cannabis cultivation activities under the Proposed Program would not be anticipated to generate a substantial number of vehicle trips (see Section 4.12, Transportation and Traffic) that would affect air quality. In addition, outdoor and mixed-light cultivation activities would generally occur on such small acreages that these activities would often not require intensive use of heavy equipment.” (page 4.3-30)

The CDFA CalCannabis Program concluded that small outdoor Cannabis cultivation operations would not contribute significantly to greenhouse gas emissions because of the limited use of combustion-powered equipment and vehicles and because County ordinances limit the use of generators to emergency use only (CDFA 2017).

An air quality impact assessment was performed for this project by Natural Investigations Co. (2019). Construction emissions and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod)®, Version 2016.3.2 (California Air Pollution Control Officers Association, 2017). Model output and reports from CalEEMod are provided in the appendix of the air quality assessment. Default values were used unless otherwise indicated.

Results / Emissions Estimates

Construction and operational emissions are summarized in the following tables. The results are expressed as a range of potential emissions, because exact project details are not available yet. To magnify any air quality impacts, the model was run using the worst-case scenarios, and emissions estimates are reported here using the unmitigated emissions values. The main sources of construction emissions are exhaust from heavy equipment and tailpipe emissions from cars and trucks. In the operational phase, no direct emissions will occur. Electrical consumption will contribute incrementally to greenhouse gas generation.

Lake County has adopted the Bay Area Air Quality Management District (BAAQMD) thresholds of significance as a basis for determining the significance of air quality and GHG impacts. Air emissions modeling performed for this project demonstrates that the project, in both the construction phase and the operational phase, will not generate significant quantities of ozone or particulate matter and does not exceed the project-level thresholds established by FRAQMD.

Comparison of Daily Construction Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions unmitigated (pounds/day)	BAAQMD Threshold (pounds/day)	Significance
ROG (VOC)	1 to 10	54	Less than significant
NO _x	10 to 20	54	Less than significant
CO	10 to 30	548	Less than significant
SO _x	< 1	219	Less than significant
Exhaust PM ₁₀	1 to 5	82	Less than significant
Exhaust PM _{2.5}	1 to 5	54	Less than significant
Greenhouse Gasses (CO ₂ e)	2,000 to 3,000	No threshold established	Less than significant

Comparison of Daily Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions unmitigated (pounds/day)	BAAQMD Threshold (pounds/day)	Significance
ROG (VOC)	1 to 10	54	Less than significant
NO _x	1 to 5	54	Less than significant
CO	1 to 10	548	Less than significant
SO _x	< 1	219	Less than significant
PM ₁₀ (total)	1 to 2	82	Less than significant
PM _{2.5} (total)	1 to 2	54	Less than significant
Greenhouse Gasses (CO ₂ e)	1 to 10	No threshold established	Less than significant

Comparison of Annual Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions (tons/year)	BAAQMD Threshold (tons/year)	Significance
ROG (VOC)	0 to 1	10	Less than significant
NO _x	0 to 1	10	Less than significant
CO	0 to 1	100	Less than significant
SO _x	0 to 1	40	Less than significant
PM ₁₀	0 to 1	15	Less than significant
PM _{2.5}	0 to 1	10	Less than significant
Greenhouse gasses (as CO ₂ or methane)	1 to 100	10,000	Less than significant

4.3. Permits

According to the Ordinance:

"All cannabis permittees shall obtain Authority to Construct Permit pursuant to LCAQMD Rules and Regulations, if applicable, to operate any article, machine, equipment or other contrivance which causes or may cause the issuance of an air contaminant, prior to the construction of the facility described in the Property Management Plan. All permittees shall maintain an Authority to Construct or Permit to Operate for the life of the project, until the operation is closed and equipment is removed."

Air permits from the LCAQMD may be necessary to operate these proposed facilities if regulated machines or equipment are used. For Cannabis operations, this is typically limited to the use of large electricity generators.

Any LCAQMD permits obtained should be listed in this Plan.

4.4. Dust Management

Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. The following are mitigation measures that can be used to control dust. Staff should be informed of speed limits and dust pollution. The roadways may be clearly marked for limited speed to control dust. Dusty road segments can be armored with gravel or asphalt. A road maintenance program should be implemented. On tilled earth and stockpiles, fugitive dust can be controlled by wetting the soil with a mobile water tank and hose, or by delaying ground disturbing activities until site conditions are not windy. Water applications may be concentrated during the late summer and early fall months, when soils have the lowest moisture content or when winds are severe. BMP Fact Sheets WE-1: Wind Erosion Control and NS-1: Water Conservation Practices will be implemented to provide dust control and prevent discharges from dust control activities and water supply equipment. Water application rates will be minimized as necessary to prevent runoff and ponding and water equipment leaks will be repaired immediately. During windy conditions (forecast or actual wind conditions of 25 miles per hour or greater), dust control may be applied to disturbed areas, including haul roads, to adequately control wind erosion. BMP Factsheet WM-3: Stockpile Management will be implemented using silt fences and plastic covers to prevent wind dispersal of sediment from stockpiles. The minimum amount of water should be used: refer to BMP Factsheet NS-1: Water Conservation Practices.

4.5. Odor Response Program

According to the Ordinance:

- "a. Designating an individual(s) who is/are responsible for responding to odor complaints 24 hours per day/seven (7) days a week, including holidays.*
- b. Providing property owners and residents of property within a 1,000 foot radius of the cannabis facility, with the contact information of the individual responsible for responding to odor complaints.*
- c. Policies and procedures describing the actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint.*
- d. The description of potential mitigation methods to be implemented for reducing odors, including add-on air pollution control equipment.*

e. Contingency measures to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.”

The individual(s) that are responsible for responding to odor complaints are:

- Larry Foster
- Laythen Martines

The nearest property owners or residents within a 1,000 foot radius of these cannabis facilities are:

- California Department of Transportation (Caltrans), Highway 53 right of way (approximate minimum distance of 120 feet)
- Villa La Brenta, a special event accommodation and winery, is located approximately 2,600 feet south of the cultivation compound.

The Project is located in a rural setting with large properties. The nearest neighboring structure, which is associated with a hotel/winery, is approximately 2,600 feet to the south.

If and when an odor complaint is received, it will be forwarded to the manager responsible for odor control. The incident will be logged, including time and type of complaint, the location of the odor reception, and contact info of the person making the complaint. The incident will be investigated and the problem identified. The manager will visit the site or facility in question and determine any deficiencies in the odor control system (where applicable) and identify remedies. These remedies should be implemented immediately. The manager will prepare a written response and send it by certified mail to the person who made the complaint. The correspondence should acknowledge the complaint, describe the incident, and identify what remedial actions were taken. Each odor complaint will be logged in a master odor complaint log book.

4.5.1. Odor Mitigation

Cannabis cultivation, especially during the flowering phase, generates volatile compounds (terpenes) that some people find objectionable. No significant odor impacts are anticipated from this cultivation operation, due to the limited population in the area, the small size of the cultivation operation, the setbacks from roads and property lines, and wind dilution/dispersal effects.

If odors become objectionable to neighbors, odor mitigation must be implemented. The cultivation operation should be analyzed to determine the source of odor emission and any concentrating effects. Mitigation can include some combination of the following:

- Windscreens could be erected that could partially contain odors within the cultivation compound.
- Powerful fans could be installed to guide air flow in the opposite direction.
- Alterations to atmospheric controls (temperature, air exchange, humidity) using dehumidifier, HVAC system, and/or fans.
- A high-pressure atomizing system could be installed on the perimeter. This system generates a water vapor (aerosol) that binds with the volatile compounds from Cannabis (terpenes). Charcoal filtration is the most effective odor neutralizer for indoor cultivation

operations. Air is mechanically drawn through the charcoal filters and then expelled from the greenhouse.

- An ozone generator. Ozone destroys volatile compounds.

5.0 CULTURAL RESOURCES

5.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Cultural Resources:

- (a) Intent: All permittees shall protect the cultural, historical, archaeological, and paleontological resources on the lot of record where the permitted activity is located.*
- (b) The Department shall consult with appropriate Tribe regarding the potential of such resources being located on the lot of record.*
- (c) Based on that consultation, the Department may require a cultural resource study of the property to determine the extent such resources exist on the lot of record.*
- (d) Based on that study and in consultation with the appropriate Tribe(s), the Department may require the inclusion in this section.*
- (e) This section shall include:*
 - a. Detailed procedures on actions to take if such resources are found.*
 - b. Describe the procedures to be followed if cultural, historical, archaeological, and paleontological resources are found on the property.*

5.2. Cultural Resources Assessment

The following Cultural Resources Assessment was performed for this project and is bound separately:

- Natural Investigations Co. 2020. Cultural Resources Assessment for the Cannabis Cultivation Operation at 1000 and 1270 Highway 53, Lower Lake, Lake County, California. 29 pages.

Cultural resources literature searches were conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System at Sonoma State University to determine if prehistoric or historic cultural resources were previously recorded within the project area, the extent to which the project area had been previously surveyed, and the number and type of cultural resources within a 0.25-mile radius of the project limits. A literature search was completed by the Northwest Information Center on September 27, 2019. The archival search of the archaeological and historical records, national and state databases, and historic maps included:

- National Register of Historic Places: listed properties
- California Register of Historical Resources: listed resources
- Historic Property Data File (HPDF) for Lake County
- Archaeological Determinations of Eligibility (ADOE)
- California Inventory of Historical Resources
- California Historical Landmarks
- California Points of Historical Interest

The CHRIS records search indicates that three prior studies have been conducted within the Project Area, and an additional two reports have been completed within a 0.25-mile search radius. The previous studies were completed between 2000 and 2012.

The NWIC records search also indicates no cultural resources have been previously documented within the Project Area. One lithic isolate was found during the field survey. It

was assigned the field designation, NIC-2019-HWY53-ISO-1. Isolated artifacts of the kind are by definition found outside of an interpretable archaeological context which is constituted of groups of contemporary and associated artifacts, ecofacts, features, and/or sites. Without this context, isolates typically lack the potential to yield information important in prehistory, the CRHR criterion (Criterion 4) under which archaeological resources are most often found to be significant. As such, the isolated lithic identified during this assessment are not eligible for listing on the CRHR and no further consideration is required.

Based on the findings of this assessment, there is no indication that the Project will impact any historical or archaeological resources as defined under CEQA Section 15064.5, tribal cultural resources as defined under Public Resources Code Section 21074, or human remains, including those interred outside of formal cemeteries. For these reasons, no further cultural resources work is recommended at this time and construction monitoring of any ground-disturbing activity is not recommended.

5.3. Protective measures

Protective measures consist primarily of minimizing ground disturbance, especially in sensitive areas. For this property, sensitive areas are areas that have not previously been tilled or graded, and primarily those areas that are near streams. Note that the riparian zones of streams are also protected under various federal, state, and county regulations. Another protective measure is worker awareness training. During training events, workers should be made aware of the regulations protecting cultural resources, the location of sensitive areas, and indicators of buried historic or archaeological resources or human remains, such as fragments of bone, shells, or pottery, unusual odors or staining of soil, building foundations, etc.

5.4. Inadvertent Discovery Work Plan

An Inadvertent Discovery Work Plan is only required by the County for properties known to have cultural resources. No cultural resources are known to occur within, or adjacent to, the cultivation areas. Nevertheless, Inadvertent Discovery Measures are provided here and will be implemented, and are taken directly from the California Department of Food and Agriculture's Program Environmental Impact Report (2017) prepared for the CalCannabis Cultivation Licensing program:

"Existing cultivation activities themselves would generally have limited potential for adverse impacts on cultural resources. However, cultivation may involve excavation within soil that has not been disturbed previously. As such, while considered unlikely, excavation could encounter buried historic or archaeological resources or human remains. A mitigation measure—CR-1—was added that would ensure that any unexpected discoveries of cultural resources during cultivation do not result in significant impacts.

It is also considered unlikely that cultivation itself would result in modification or demolition of historic structures that could affect the characteristics that make the building eligible for listing in the CRHR; such impacts would be more likely to occur as part of site development and, as a result, would be evaluated by the local agency during its approval process for site development. In addition, the CalCannabis Licensing

Program's environmental protection measures related to cultural resources, specifically the accidental discovery of human remains (Section 8313[c] of the proposed regulations), would require applicants to halt cultivation activities and implement Health and Safety Code Section 7050.5 if human remains were discovered.....

Mitigation Measure CR-1: *Suspend Cultivation Immediately if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for CRHR Eligibility, and Implement Appropriate Mitigation Measures for Eligible Resources.*

Not all cultural resources are visible on the ground surface. As a result, before initiation of ground-disturbing activities, the licensee shall arrange for cultivation employees to receive training about the kinds of archaeological materials that could be present at the cultivation site and the protocols to be followed should any such materials be uncovered during cultivation. Training shall be conducted by an archaeologist who meets the U.S. Secretary of the Interior's professional standards. Training shall be required during each phase of cultivation to educate new cultivation personnel.

If any cultural resources, including structural features, unusual amounts of bone or shell, flaked or ground stone artifacts, historic-era artifacts, human remains, or architectural remains, are encountered during cultivation activities, work shall be suspended immediately at the location of the find and within a radius of at least 50 feet and the appropriate jurisdiction will be contacted.

All cultural resources uncovered during cultivation within the site shall be evaluated for eligibility for inclusion in CRHR. Resource evaluations shall be conducted by individuals who meet the U.S. Secretary of the Interior's professional standards in archaeology, history, or architectural history, as appropriate. If any of the resources meet the eligibility criteria identified in PRC Section 5024.1 or State CEQA Guidelines Section 21083.2(g), mitigation measures will be developed and implemented in accordance with State CEQA Guidelines Section 15126.4(b) before cultivation resumes.

For any resources eligible for listing in the CRHR that would be significantly adversely affected by cultivation, additional mitigation measures shall be implemented. Mitigation measures for archaeological resources may include (but are not limited to) avoidance; incorporation of sites within parks, greenspace, or other open space; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for archaeological resources shall be developed in consultation with responsible agencies and, as appropriate, interested parties such as Native American tribes. Implementation of the approved mitigation is required before resuming any cultivation activities with the potential to affect identified eligible resources at the site."

6.0 ENERGY USAGE

6.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Energy Usage:

(a) *Intent: Permittees shall minimize energy usage.*

(b) *In this section permittees shall:*

- a. *Provide energy calculation as required by the California Building Code*
- b. *Identify energy conservation measures to be taken and maintained including providing proof of compliance with CCR Title 3, Division 8, Chapter 1, Section 8305 the Renewable Energy Requirements.*
- c. *If alternative energy sources are to be used, describe those sources and the amount of electricity that will be provided.*
- d. *For indoor cannabis cultivation licensees, ensure that electrical power used for commercial cannabis activity shall be provided by any combination of the following:*
 - (1) *On-grid power with 42 percent renewable source.*
 - (2) *Onsite zero net energy renewable source providing 42 percent of power.*
 - (3) *Purchase of carbon offsets for any portion of power above 58 percent not from renewable sources.*
 - (4) *Demonstration that the equipment to be used would be 42 percent more energy efficient than standard equipment, using 2014 as the baseline year for such standard equipment.*
- e. *Describe what parameters will be monitored and the methodology of the monitoring program.*

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"The indoor or mixed-light cultivation of cannabis shall not rely on a personal gasoline, diesel, propane, or similar fuels, powered generator as a primary source of power and shall only allow properly permitted (when applicable) generators for temporary use in the event of a power outage or emergency that is beyond the permittee's control."

6.2. Energy Calculations

The CDFW CalCannabis Program states the following:

"Outdoor cultivation utilizes natural daylight for photosynthesis, although cultivators may have use artificial lighting to maintain immature plants as a source for propagation. Outdoor cultivation operations typically start the plants indoors or in greenhouses before moving them outside during the summer months. Under the Proposed Program, it is anticipated that this cultivation type would have the least lighting needs, compared to indoor, mixed-light, and nursery operations."

"Note that lighting may be used for propagation under any of the Proposed Program's license types, although for outdoor licenses, this is permissible only to maintain immature plants as a source for propagation."

"Outdoor cultivation is conducted without the use of artificial lighting for plant growth, with the exception that artificial lighting is permissible to maintain immature plants as a source or plant propagation (CDFA 2017)."

The proposed cultivation operation does not have service hookups to an electricity utility provider. The Project intends to install and utilize on-site solar arrays. The proposed Project will be full sun/outdoor cultivation operations, with some mixed light for propagation purposes.

A solar-powered electrical system will be installed to power low voltage items such as security cameras, and water pumps for distributing water and mixing liquid fertilizers into the irrigation systems.

A small immature plant nursery will be established in the mixed light greenhouse/nursery facility. This facility will use on-demand or battery power stored from the photovoltaic array. Lighting within the greenhouse will typically be utilized when weather prevents sufficient sunlight, or for short durations in late winter/early spring to control photoperiod.

This cultivation operation does not involve indoor cultivation; it is an outdoor cultivation operation. For this cultivation operation, small solar-powered electrical systems will be installed to power low voltage items such as security cameras and water pumps for mixing liquid fertilizers into the irrigation systems. If indoor cultivation operations are initiated, this Energy Use Plan must be updated, and energy calculations performed. A multi-purpose 40 ft by 60 ft metal building will be constructed for material and equipment storage, security monitoring, plant processing, and to house a restroom.

6.3. Energy Conservation Measures

A combination of the following energy conservation measures may be employed at this operation:

- use of solar power where electricity is needed, and use of high-efficiency storage batteries, such as lithium-ion
- use of passive solar energy techniques such as proper site selection, overhanging eaves, tree canopy cover, walls with high thermal inertia, etc.
- use of LED lights or other high-efficiency lighting
- use of ambient light whenever possible
- use of highly insulative materials to reduce energy needed for structure heating and cooling
- use of electric vehicles or bicycles instead of combustion-powered vehicles, whenever possible
- use of hand tools instead of power tools

All new buildings, alterations, additions, and commercial buildings in California must comply with the Building Energy Efficiency Standards according to Title 24, Part 6 of California Code of Regulation. Energy compliance documentation is typically required at the building permit phase. The following online resource can be used to calculate energy usage and conservation measures: <http://www.energy.ca.gov/title24/orc/>. Also refer to the 2016 Building Energy Efficiency Standards for Residential and Non-Residential Buildings.

6.4. Alternative Energy Sources

The conceptual solar power system planned for the cultivation area will consist of an array of solar panels, an inverter, control panel, and batteries. The estimated power output will be about 2 kilowatt hours per day. Internet sources provide this equation for calculating the energy production of a solar array: *"Using 4 hours of full sun, gives you this equation: 250 watts x 4 hours. That's 1 kWh (1,000 watt hours) in a day per 250-watt panel. If you multiply 1kWh per panel by 30 days in a month, you'll find that each 250 watt rated panel will produce*

about 30 kWh in an average month.” (<https://solarpowerrocks.com/solar-basics/how-much-electricity-does-a-solar-panel-produce/>).

6.5. Monitoring Program

Energy monitoring is primarily intended for large energy demands, such as indoor cultivation, which is not planned at this operation. However, mixed-light cultivation methods will be used within the greenhouse(s).

Nevertheless, energy consumption will be monitored and metered data stored. Energy consumption will be metered using Electric Meters (KWh Meters) for alternating current and DC meters that measure power in ampere-hours. The meters are included in the controllers / inverters that are part of the solar power system.

7.0 FERTILIZER USAGE

7.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Fertilizer Usage:

(a) Intent: To ensure consistency fertilizer storage and use with the other sections of the property management plan.

(b) This section shall describe how cultivation and nursery permittees will comply with the following fertilizer application and storage protocols:

- a. Comply with all fertilizer label directions;*
- b. Store fertilizers in a secure building or shed;*
- c. Contain any fertilizer spills and immediately clean up any spills;*
- d. Apply the minimum amount of product necessary;*
- e. Prevent offsite drift;*
- f. Do not spray directly to surface water or allow fertilizer product to drift to surface water. Spray only when wind is blowing away from surface water bodies;*
- g. Do not apply fertilizer when they may reach surface water or groundwater; and*
- h. The use of fertilizer shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.*

(c) This section shall include a map of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 100 feet of the lot of record and a 100-foot setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

(d) Describe what parameters will be monitored and the methodology of the monitoring program.

The following Site Management Plan was prepared for this project and is bound separately:

- Natural Investigations Co. 2019. Site Management Plan for the Cultivation Operations at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared for the RWQCB. October 2019.

The following Nitrogen Management Plan was prepared for this project and is bound separately:

- Natural Investigations Co. 2019. Nitrogen Management Plan for the Cultivation Operations at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared for the RWQCB. October 2019.

7.2. Inventory of Fertilizers

To establish the outdoor gardens, native soil will be enriched with fertilizer. No bulk material use is currently planned.

The operation plans on using the following dry fertilizers on an annual basis:

- Jack's Nutrients Part A, 5-12-26 (N-P-K), 25 pound bag
- Jack's Nutrients Part B, 15-0-0, 25 pound bag

The estimated application schedule and quantities are as follows:

- March 25 pounds Part A
- April 25 pounds Part A
- May 25 pounds Part A

- June 10 pounds Part A and 10 pounds Part B
- July 10 pounds Part A and 10 pounds Part B
- August 25 pounds Part B
- September 25 pounds Part B
- October 25 pounds Part B

When the gardens are operational, this Plan will be updated with an inventory of fertilizers and their annual application rates.

7.3. Storage and Handling Protocols

Liquid or granular fertilizers can be mixed with water in mixing tanks; plastic tubing and driplines can then be used to gravity-feed the water / fertilizer mixture to the planting stations. Fertilizers and soil amendments can also be applied directly to the planting stations by shovel or by using a spray tank mounted to a backpack, all-terrain vehicle, golf cart, or a garden cart.

Fertilizers will be stored in a stormproof shed or Conex container to prevent stormwater from being contaminated. Fertilizers will be properly labeled and open containers sealed when stored. Personal protective equipment will be used by staff when handling fertilizers and other chemicals, such as safety glasses, gloves, dust mask or respirator, boots, and pants and long-sleeved shirt. Fertilizers will be handled and applied according to their instructions. See Material Safety Data Sheets in the Appendix for specific information. The following fertilizer application and storage protocols will be implemented:

- Comply with all label directions;
- Store chemicals in a secure building or shed to prevent access by wildlife;
- Contain any chemical leaks and immediately clean up any spills;
- Apply the minimum amount of product necessary;
- Prevent offsite drift;
- Do not apply chemicals when pollinators are present;
- Do not spray directly to surface water or allow chemical product to drift to surface water.

7.4. Monitoring Program

The monitoring program for fertilizers is incorporated in to the Stormwater Monitoring Program. In general, the monitoring program consists of regular inspections of chemical storage areas, the immediate cleanup of spilled products, recordkeeping of quantities and types of fertilizers used, and employee training and personal protection.

7.5. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

8.0 FISH AND WILDLIFE PROTECTION

8.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Fish and Wildlife Protection:

(a) *Intent: To minimize adverse impacts on fish and wildlife.*

(b) *In this section permittees shall include:*

- a. *A description of the fish and wildlife that are located on or utilize on a seasonal basis the lot of record where the permitted activity is located.*
- b. *A description of the habitats found on the lot of record.*
- c. *A description of the watershed in which the permitted activity is located.*
- d. *Describe how the permittee will minimize adverse impacts on the fish and wildlife.*
- e. *A map showing the location of any conservation easements or wildlife corridors proposed.*

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

“Tree Removal. The removal of any commercial tree species as defined by the California Code of Regulations section 895.1, Commercial Species for the Coast Forest District and Northern Forest District, and the removal of any true oak species (Quercus species) or Tan Oak (Notholithocarpus spices) for the purpose of developing a cannabis cultivation site should be avoided and minimized. This shall not include the pruning of any such tree species for the health of the tree or the removal of such trees if necessary for safety or disease concerns.”

Note also that the removal of commercial tree species requires either a Timberland Conversion Permit from California Department of Forestry and Fire Protection for the conversion of timberland greater than 3 acres, or an exemption for the conversion of timberland less than 3 acres.

The following Biological Site Assessment was performed for the proposed project and is bound separately:

- Natural Investigations Co. 2019. Biological Site Assessment for the Cannabis Cultivation Operations at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared for RWQCB. October 2019

8.2. Description of Fish & Wildlife, Habitats, and Watersheds

8.2.1. Fish and Wildlife

Consulting biologist Ted Hermansen, M.S., conducted a reconnaissance-level biological field survey on September 19, 2019. Botanist and Senior biologist Tim Nosal, MS. conducted another field survey on October 1, 2020. The Property was previously used for grazing, but is predominantly natural woodland. Aside from dirt roads and existing water supply system, it is undeveloped. The California Natural Diversity Data Base (CNDDDB) was queried, and any reported occurrences of special-status species were plotted in relation to the cultivation areas using GIS software (see exhibits). A federal species list was also generated from the USFWS website.

No special-status animals or plants were detected within the operational or adjacent areas during the surveys; however, follow up botanical surveys were recommended during the biological site assessment results based on the results, which are discussed below. The

following animals were detected within the Property during the field survey: fence lizard (*Sceloporus occidentalis*); coyote (*Canis latrans*; sign); California quail (*Callipepla californica*); turkey vulture (*Cathartes aura*); acorn woodpecker (*Melanerpes formicivorus*), wild turkey (*Meleagris gallopavo*); common raven (*Corvus corax*); wrentit (*Chamaea fasciata*); Stellar's jay (*Cyanocitta stelleri*), Botta's pocket gopher (*Thomomys bottae*, sign); and unverified large deer species, likely tule elk (*Cervus elaphus nannodes*; sign). A list of plants observed during the survey is included in the biological site assessment.

The CNDDDB reported two special-status plant species occurrences within the Property, eel-grass pondweed (*Potamogeton zosteriformis*, S3/2B.2) and bent-flowered fiddle neck (*Amsinckia lunaris*; G3/S3/1B.2). The eel-grass pondweed occurrence is an historical (1945) record with a 5-mile radius of uncertainty; therefore, it is non-specific and not reliable, additionally there is no suitable permanently inundated aquatic habitat within the Property. The bent-flowered fiddle neck record is from 1980 and is located along highway 53, immediately adjacent to the Property. Within a 10-mile buffer around the Property, the CNDDDB reported various special-status species occurrences, summarized in the table below.

The USFWS species list generated online includes: northern spotted owl (*Strix occidentalis caurina*), California red-legged frog (*Rana draytonii*), delta smelt (*Hypomesus transpacificus*), Burke's goldfields (*Lasthenia burkei*), few-flowered navarretia (*Navarretia leucocephala* ssp. *pauciflora*), and slender Orcutt grass (*Orcuttia tenuis*). The USFWS species list is based on a watershed approach and does not necessarily consider the specific area that the Property is located within or habitat suitability.

Table 1. Special-status Species Reported by CNDDB in the Vicinity of the Property

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
PLANTS				
<i>Amsinckia lunaris</i>	bent-flowered fiddleneck	S3/1B.3	CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND.	50-500M.
<i>Arctostaphylos manzanita ssp. elegans</i>	Konocti manzanita	S3/1B.3	CHAPARRAL, CISMONTANE WOODLAND, LOWER MONTANE CONIFEROUS FOREST.	VOLCANIC SOILS. 395-1615 M.
<i>Arctostaphylos stanfordiana ssp. raichei</i>	Raiche's manzanita	S2/1B.1	CHAPARRAL, LOWER MONTANE CONIFEROUS FOREST.	ROCKY, SERPENTINE SITES. SLOPES AND RIDGES. 450-1000 M.
<i>Astragalus rattanii var. jepsonianus</i>	Jepson's milk-vetch	S3/1B.2	CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND, CHAPARRAL.	COMMONLY ON SERPENTINE IN GRASSLAND OR OPENINGS IN CHAPARRAL. 180-1000 M.
<i>Balsamorhiza macrolepis</i>	big-scale balsamroot	S2/1B.2	CHAPARRAL, VALLEY AND FOOTHILL GRASSLAND, CISMONTANE WOODLAND.	SOMETIMES ON SERPENTINE. 90-1555 M.
<i>Brasenia schreberi</i>	watershield	S3/2B.3	FRESHWATER MARSHES AND SWAMPS.	AQUATIC FROM WATER BODIES BOTH NATURAL AND ARTIFICIAL IN CALIFORNIA.
<i>Brodiaea rosea</i>	Indian Valley brodiaea	CE/G2/S2	Strictly serpentine soils. Occurs usually in wetlands, occasionally in non-wetlands (Calflora 2019)	-
<i>Calystegia collina ssp. tridactylosa</i>	three-fingered morning-glory	S1/1B.2	CHAPARRAL, CISMONTANE WOODLAND.	ROCKY, GRAVELLY OPENINGS IN SERPENTINE. 0-600 M.
<i>Castilleja rubicundula var. rubicundula</i>	pink creamsacs	S2/1B.2	CHAPARRAL, MEADOWS AND SEEPS, VALLEY AND FOOTHILL GRASSLAND.	OPENINGS IN CHAPARRAL OR GRASSLANDS. ON SERPENTINE. 20-900 M.
<i>Centromadia parryi ssp. parryi</i>	pappose tarplant	S2/1B.2	COASTAL PRAIRIE, MEADOWS AND SEEPS, COASTAL SALT MARSH, VALLEY AND FOOTHILL GRASSLAND.	VERNALLY MESIC, OFTEN ALKALINE SITES. 2-420M.
<i>Downingia willamettensis</i>	Cascade downingia	S2/2B.2	Community association: Yellow Pine Forest, Douglas-Fir	-

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
			Forest, Redwood Forest, wetland-riparian. Occurs in wetlands (Calflora 2019)	
<i>Eriastrum brandegeae</i>	Brandegee's eriastrum	S1/1B.1	CHAPARRAL, CISMONTANE WOODLAND.	ON BARREN VOLCANIC SOILS; OFTEN IN OPEN AREAS. 425-840 M.
<i>Eriastrum tracyi</i>	Tracy's eriastrum	CR/S3	CHAPARRAL, CISMONTANE WOODLAND.	GRAVELLY SHALE OR CLAY; OFTEN IN OPEN AREAS. 315-760 M.
<i>Erigeron greenei</i>	Greene's narrow-leaved daisy	S3/1B.2	CHAPARRAL.	SERPENTINE AND VOLCANIC SUBSTRATES, GENERALLY IN SHRUBBY VEGETATION. 80-1005 M.
<i>Eriogonum nervulosum</i>	Snow Mountain buckwheat	G2/S2/1B.2	CHAPARRAL.	DRY SERPENTINE OUTCROPS, BALDS, AND BARRENS. 300-2100 M.
<i>Eryngium constancei</i>	Loch Lomond button-celery	FE/CE/G1/S1/1B.1	VERNAL POOLS.	VOLCANIC ASH FLOW VERNAL POOLS. 460-855 M.
<i>Extriplex joaquinana</i>	San Joaquin spearscale	G2/S2/1B.2	CHENOPOD SCRUB, ALKALI MEADOW, PLAYAS, VALLEY AND FOOTHILL GRASSLAND.	IN SEASONAL ALKALI WETLANDS OR ALKALI SINK SCRUB WITH DISTICHLIS SPICATA, FRANKENIA, ETC. 1-835 M.
<i>Fritillaria pluriflora</i>	adobe-lily	G2G3/S2S3/1B.2	CHAPARRAL, CISMONTANE WOODLAND, FOOTHILL GRASSLAND.	USUALLY ON CLAY SOILS; SOMETIMES SERPENTINE. 60-705 M.
<i>Gratiola heterosepala</i>	Boggs Lake hedge-hyssop	CE/G2/S2/1B.2	MARSHES AND SWAMPS (FRESHWATER), VERNAL POOLS.	CLAY SOILS; USUALLY IN VERNAL POOLS, SOMETIMES ON LAKE MARGINS. 10-2375 M.
<i>Grimmia torenii</i>	Toren's grimmia	S2/1B.3	CISMONTANE WOODLAND, LOWER MONTANE CONIFEROUS FOREST, CHAPARRAL.	OPENINGS, ROCKY, BOULDER AND ROCK WALLS, CARBONATE, VOLCANIC. 325-1160 M.
<i>Harmonia hallii</i>	Hall's harmonia	1B.2	CHAPARRAL.	SERPENTINE HILLS AND RIDGES. OPEN, ROCKY AREAS WITHIN CHAPARRAL. 500-900 M.
<i>Hesperolinon adenophyllum</i>	glandular western	G2G3/S2S3/1B.2	CHAPARRAL, CISMONTANE WOODLAND, VALLEY AND	SERPENTINE SOILS; GENERALLY FOUND IN SEPENTINE

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
	flax		FOOTHILL GRASSLAND.	CHAPARRAL. 150-1315 M.
<i>Hesperolinon bicarpellatum</i>	two-carpellate western flax	G2/S2/1B.2	SERPENTINE CHAPARRAL.	SERPENTINE BARRENS AT EDGE OF CHAPARRAL. 60-1005 M.
<i>Hesperolinon sharsmithiae</i>	Sharsmith's western flax	G2/S2/1B.2	CHAPARRAL.	SERPENTINE SUBSTRATES. 270-300 M.
<i>Horkelia bolanderi</i>	Bolander's horkelia	G1/S1/1B.2	Yellow Pine Forest, Valley Grassland, wetland-riparian. Meadows, edges. Equally likely to occur in wetlands and non-wetlands (Calflora 2019)	-
<i>Imperata brevifolia</i>	California satintail	S3/2B1	COASTAL SCRUB, CHAPARRAL, RIPARIAN SCRUB, MOJAVEAN SCRUB, MEADOWS AND SEEPS (ALKALI), RIPARIAN SCRUB.	MESIC SITES, ALKALI SEEPS, RIPARIAN AREAS. 0-1215 M.
<i>Lasthenia burkei</i>	Burke's goldfields	FE/CE/G1/S1/1B.1	VERNAL POOLS, MEADOWS AND SEEPS.	MOST OFTEN IN VERNAL POOLS AND SWALES. 15-600 M.
<i>Layia septentrionalis</i>	Colusa layia	G2/S2/1B.2	CHAPARRAL, CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND.	SCATTERED COLONIES IN FIELDS AND GRASSY SLOPES IN SANDY OR SERPENTINE SOIL. 145-1095M.
<i>Legenere limosa</i>	legenere	G2/S2/1B.2	VERNAL POOLS.	IN BEDS OF VERNAL POOLS. 1-880 M.
<i>Limnanthes floccosa</i> ssp. <i>floccosa</i>	woolly meadowfoam	S3	CHAPARRAL, CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS.	VERNALLY WET AREAS, DITCHES, AND PONDS. 60-1335 M.
<i>Lupinus sericatus</i>	Cobb Mountain lupine	1B.2	CHAPARRAL, CISMONTANE WOODLAND, LOWER MONTANE CONIFEROUS FOREST, BROADLEAFED UPLAND FOREST.	IN STANDS OF KNOBCONE PINE-OAK WOODLAND, ON OPEN WOODED SLOPES IN GRAVELLY SOILS; SOMETIMES ON SERPENTINE. 275-1525 M.
<i>Navarretia leucocephala</i> ssp. <i>bakeri</i>	Baker's navarretia	S2/1B.1	CISMONTANE WOODLAND, MEADOWS AND SEEPS, VERNAL POOLS, VALLEY AND FOOTHILL GRASSLAND, LOWER MONTANE CONIFEROUS FOREST.	VERNAL POOLS AND SWALES; ADOBE OR ALKALINE SOILS. 5-1740 M.

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
<i>Navarretia leucocephala</i> ssp. <i>pauciflora</i>	few-flowered navarretia	FE/CT/S1/1 B.1	VERNAL POOLS.	VOLCANIC ASH FLOW, AND VOLCANIC SUBSTRATE VERNAL POOLS. 400-855 M.
<i>Navarretia leucocephala</i> ssp. <i>plieantha</i>	many-flowered navarretia	FE/CE/S1/1 B.2	VERNAL POOLS.	VOLCANIC ASH FLOW VERNAL POOLS. 30-950 M.
<i>Navarretia nigelliformis</i> ssp. <i>radians</i>	shining navarretia	S2/1B.2	CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS.	APPARENTLY IN GRASSLAND, AND NOT NECESSARILY IN VERNAL POOLS. 200-1000M.
<i>Potamogeton zosteriformis</i>	eel-grass pondweed	S3/2B.2	MARSHES AND SWAMPS.	PONDS, LAKES, STREAMS. 0-1860 M.
<i>Puccinellia simplex</i>	California alkali grass	G3/S2/1B.2	Valley Grassland, wetland-riparian. Occurs usually in wetlands, occasionally in non-wetlands (Calflora 2019)	-
<i>Sedella leiocarpa</i>	Lake County stonecrop	FE/CE/G1/ S1/1B.1	VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS, CISMONTANE WOODLAND.	LEVEL AREAS THAT ARE SEASONALLY WET AND DRY OUT IN LATE SPRING; SUBSTRATE USUALLY OF VOLCANIC ORIGIN. 365-790 M.
<i>Sidalcea oregana</i> ssp. <i>hydrophila</i>	marsh checkerbloom	S1/1B.2	MEADOWS AND SEEPS, RIPARIAN FOREST.	WET SOIL OF STREAMBANKS, MEADOWS. 1100-2300 M.
<i>Streptanthus brachiatus</i> ssp. <i>hoffmanii</i>	Freed's jewelflower	G2/S2/1B.2	CHAPARRAL, CISMONTANE WOODLAND.	SERPENTINE ROCK OUTCROPS, PRIMARILY IN GEOTHERMAL DEVELOPMENT AREAS. 490-1220 M.
<i>Viburnum ellipticum</i>	oval-leaved viburnum	2B.3	CHAPARRAL, CISMONTANE WOODLAND, LOWER MONTANE CONIFEROUS FOREST.	215-1400 M.
ANIMALS				
<i>Antrozous pallidus</i>	pallid bat	S3/SSC	DESERTS, GRASSLANDS, SHRUBLANDS, WOODLANDS & FORESTS. MOST COMMON IN OPEN, DRY HABITATS WITH ROCKY AREAS FOR ROOSTING.	ROOSTS MUST PROTECT BATS FROM HIGH TEMPERATURES. VERY SENSITIVE TO DISTURBANCE OF ROOSTING SITES.
<i>Aquila</i>	golden	S3/FP/BGE	ROLLING FOOTHILLS, MOUNTAIN AREAS, SAGE-	CLIFF-WALLED CANYONS PROVIDE NESTING HABITAT IN

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
<i>chrysaetos</i>	eagle	PA	JUNIPER FLATS, & DESERT.	MOST PARTS OF RANGE; ALSO, LARGE TREES IN OPEN AREAS.
<i>Archoplites interruptus</i>	Sacramento perch	G2G3/S1/SC	HISTORICALLY FOUND IN THE SLOUGHS, SLOW-MOVING RIVERS, AND LAKES OF THE CENTRAL VALLEY.	PREFERS WARM WATER. AQUATIC VEGETATION IS ESSENTIAL FOR YOUNG. TOLERATES WIDE RANGE OF PHYSIO-CHEMICAL WATER CONDITIONS.
<i>Coccyzus americanus occidentalis</i>	western yellow-billed cuckoo	FT/CE.S1	RIPARIAN FOREST NESTER, ALONG THE BROAD, LOWER FLOOD-BOTTOMS OF LARGER RIVER SYSTEMS.	NESTS IN RIPARIAN JUNGLES OF WILLOW, OFTEN MIXED WITH COTTONWOODS, W/ LOWER STORY OF BLACKBERRY, NETTLES, OR WILD GRAPE.
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	S2/SSC	THROUGHOUT CALIFORNIA IN A WIDE VARIETY OF HABITATS. MOST COMMON IN MESIC SITES.	ROOSTS IN THE OPEN, HANGING FROM WALLS & CEILINGS. ROOSTING SITES LIMITING. EXTREMELY SENSITIVE TO HUMAN DISTURBANCE.
<i>Dubiraphia brunnescens</i>	brownish dubiraphia riffle beetle	G1/S1	AQUATIC; KNOWN ONLY FROM THE NE SHORE OF CLEAR LAKE, LAKE COUNTY.	INHABITS EXPOSED, WAVE-WASHED WILLOW ROOTS.
<i>Emys marmorata</i>	western pond turtle	G2G4/S3/SC	A THOROUGHLY AQUATIC TURTLE OF PONDS, MARSHES, RIVERS, STREAMS & IRRIGATION DITCHES, USUALLY WITH AQUATIC VEGETATION	NEED BASKING SITES AND SUITABLE (SANDY BANKS OR GRASSY OPEN FIELDS) UPLAND HABITAT UP TO 0.5 KM FROM WATER FOR EGG-LAYIN
<i>Erethizon dorsatum</i>	North American porcupine	S3	Dense forests, tundra, grasslands and desert shrub communities (IUCN 2019)	-
<i>Hedychridium milleri</i>	Borax Lake cuckoo wasp	G1/S1	ENDEMIC TO CENTRAL CALIFORNIA. ONLY COLLECTION IS FROM THE TYPE LOCALITY.	EXTERNAL PARASITE OF WASP AND BEE LARVA.
<i>Lavinia exilicauda chi</i>	Clear Lake hitch	CT/S1	FOUND ONLY IN CLEAR LAKE, LAKE CO, AND ASSOCIATED PONDS. SPAWNS IN STREAMS FLOWING INTO CLEAR LAKE.	ADULTS FOUND IN THE LIMNETIC ZONE. JUVENILES FOUND IN THE NEARSHORE SHALLOW-WATER HABITAT HIDING IN THE VEGETATION.

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
<i>Ochthebius recticulus</i>	Wilbur Springs minute moss beetle	G1/S1	AQUATIC; KNOWN ONLY FROM WILBUR HOT SPRINGS AREA, COLUSA COUNTY; 1250 FT ELEV.	INHABITS THE SHORELINE OF THE CREEK AT WILBUR HOT SPRINGS.
<i>Paracoenia calida</i>	Wilbur Springs shore fly	G1/S1	ENDEMIC TO WILBUR HOT SPRINGS, COLUSA COUNTY.	INHABITS ALL BUT THE HOTTEST PORTION OF THE HOT SPRING EFFLUENT; WATER TEMP 20-40 DEG C.
<i>Pyrgulopsis ventricosa</i>	Clear Lake pyrg	G1/S1	Springs and small spring-fed streams, where it is found on vegetation (IUCN 2019)	-
<i>Rana boylei</i>	foothill yellow-legged frog	CC/G3/S3/SSC	PARTLY-SHADED, SHALLOW STREAMS & RIFFLES WITH A ROCKY SUBSTRATE IN A VARIETY OF HABITATS.	NEED AT LEAST SOME COBBLE-SIZED SUBSTRATE FOR EGG-LAYING. NEED AT LEAST 15 WEEKS TO ATTAIN METAMORPHOSIS.
<i>Saldula usingeri</i>	Wilbur Springs shorebug	G1/S1	REQUIRES SPRINGS/CREEKS WITH HIGH CONCENTRATIONS OF NA, CL, & LI.	FOUND ONLY ON WET SUBSTRATE OF SPRING OUTFLOWS.
<i>Taricha rivularis</i>	red-bellied newt	S2/SSC	Adults are terrestrial and breeds in streams and rivers. Found in coastal woodland and redwood forest along the coast of northern California (Calherps 2019)	-

*Definitions of Status Codes: FE = Federally listed as endangered; FT = Federally listed as threatened; FPE = Federally proposed for listing as endangered; FPT = Federally proposed for listing as threatened; FC = Candidate for Federal listing; MB = Migratory Bird Act; CE = California State listed as endangered; CT = California State listed as threatened; SSC = California species of special concern; CR = California rare species; CFP = California fully protected species; CNPS (California Native Plant Society) List 1A = Plants presumed extinct in California by CNPS; CNPS List 1B = CNPS designated rare or endangered plants in California and elsewhere; and CNPS List 2 = CNPS designated rare or endangered plants in California, but more common elsewhere. Global Ranking: G1 = Critically Imperiled; G2 = Imperiled; G3 = Vulnerable. State Ranking: S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable.

**Copied verbatim from CNDDDB, unless otherwise noted.

8.2.2. Habitats

Vegetation Communities

The proposed cultivation site is located within the Inner North Coast Range geographic subregion, which is contained within the Northwestern California geographic subdivision of the larger California Floristic Province (Baldwin et al. 2012). This region has a Mediterranean-type climate, characterized by distinct seasons of hot, dry summers and wet, moderately-cold winters. The Parcel and vicinity are in Sunset Climate Zone 7, California's Gray Pine Belt, with hot summers and mild but pronounced winters without severe winter cold or high humidity (Brenzel, 2012).

The Property contains the following terrestrial vegetation communities: ruderal/developed; non-native grassland, mixed oak / conifer woodland, chaparral, and blue oak woodland. These vegetation communities are discussed here and are delineated in the Exhibits.

Ruderal/Developed: These areas consist of disturbed or converted natural habitat that are now either in a ruderal (constantly disturbed) state, or urbanized with gravel roads, or structure and utility placement. These areas include roads and parking areas, residences, outbuildings, gardens, and lawn. Vegetation within this habitat type consists primarily of nonnative ornamental plants or invasive species lacking a consistent community structure.

Non-native Annual Grassland: The non-native grassland habitat is primarily comprised of non-native annual grasses and herbs. Plants common in this habitat type include oat (*Avena* spp.), bromes (*Bromus* spp.), thistles (*Centaurea*, *Carduus*, etc.), and a variety of annual herbs. Within the Property this community contained a high percentage of medusahead (*Taeniatherum caput-medusae*) on the hillside along the southern boundary. Other areas contained small patches of native grasses, such as purple needle grass (*Stipa pulchra*).

Mixed Oak / Conifer Woodland: The community contains a high diversity of tree species on north-facing slopes, including: blue oak (*Quercus douglasii*), interior live oak (*Quercus wislizeni*), gray pine/foothill pine (*Pinus sabiniana*), black oak (*Quercus kelloggii*), madrone (*Arbutus menziesii*), ponderosa pine (*Pinus ponderosa*), valley oak (*Quercus lobata*), and coast live oak (*Quercus agrifolia*). Although the upper canopy is often fairly dense this community, open patches can have an understory of chaparral or non-native grassland plants.

Chaparral: The community occurs in xeric, often south-facing slopes, as a successional stage between grasslands and tree dominated landscapes. It is often dominated by shrubs such as manzanita (*Arctostaphylos* spp.), chamise (*Adenostoma fasciculatum*), deerbrush and buckbrush (*Ceanothus* spp.), coyote brush (*Baccharis pilularis*), and toyon (*Heteromeles arbutifolia*). Poison-oak (*Toxicodendron diversilobum*) and yerba santa (*Eriodictyon californicum*) are also common.

Blue Oak Woodland: This vegetation community consists of scattered blue oak trees ranging from nearly closed-canopy to savanna-like conditions and is usually associated with shallow, rocky, infertile, well-drained soils. Blue oaks are often the only trees species present. The density of trees is related to availability of water. Although chaparral shrubs may be present, annual grasses and forbs dominate the understory.

Wildlife Habitats

The habitat types found within the Property are classified as “Urban”, “Blue Oak-Foothill Pine”, “Blue Oak Woodland”, “Annual Grassland” and “Mixed Chaparral” wildlife habitat types by CDFW’s Wildlife Habitat Relationship System (WHR). The wildlife habitats that are present in the Project Area are: “Urban” and “Blue Oak Woodland”.

The Project Area is not within any designated listed species’ critical habitat and does not provide suitable habitat for special-status wildlife species, except potentially for golden eagle, and no large raptor nests were observed during the biological survey. Follow up botanical surveys should be performed to confirm that no special-status plants occur within the operation areas as the survey was performed outside of the known blooming period for *Amsinckia lunaris* and suitable habitat exists within the Project Area. If encountered, this species should be avoided by an appropriate buffer as determined by a qualified/experienced botanist or CDFW should be contacted to develop appropriate mitigation measures. The Project Area does not have the potential to sustain aquatic special-status species. Seasonal drainages occur near the Project Area and are unlikely to support special status species known from the region. Nevertheless, watercourses are a protected habitat and they will be avoided at a minimum by the required setbacks (50 feet for low risk Class III watercourses and 100 feet for low risk Class II watercourses). Although potential impacts to the special-status plant discussed above (*Amsinckia lunaris*) were identified, the implementation of avoidance and mitigation measures will ensure that impacts will be less than significant.

Implementation of the project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Implementation of the project does not conflict with any county or municipal policies or ordinances protecting biological resources. No preserves or wildlife corridors need to be established for impact mitigation.

8.2.3. Watershed

The operational areas are in the Burns Valley-Frontal Clear Lake subwatershed (12-digit HUC code is 180201160309). The topography of the Property is gently sloping hillside with an average slope of 5%. The elevation ranges from approximately 1,480 feet to 1,680 feet above mean sea level. The following water features were detected within the Property during the field survey: three Class III watercourses and a Class II watercourse (see Exhibits). All were dry during the survey and predominantly barren.

All Class III watercourses emanate from culverts along the western border. The smallest briefly crosses the southwest corner of the Property before entering an adjacent vineyard. The other two are approximately 2-foot wide on average and have a cobble or gravel substrate; these enter a Class II watercourse on the eastern border of the Property, which is approximately 8-foot wide on average and has a gravel substrate. Portions of the larger watercourse contain aquatic vegetation, such as rush (*Juncus* sp.).

There are no vernal pools or other isolated wetlands in the Property.

Drainages within the Property eventually merge and run southwest, emptying into Clear Lake. Clear Lake is the headwaters for Cache Creek, which flows east and eventually joins the Sacramento River.

The surrounding land uses are vineyard to the west and southwest, and grazing and natural lands to the north, east, and south. The Property was previously used for grazing, but is predominantly natural woodland. A cattle crossing on the western boundary connects to an area that has largely been converted to vineyard. Aside from the existing water supply systems (wells, pumphouse, and cisterns), a fenced garden with raised beds (not currently in use), and dirt roads, the Property is undeveloped.

Aside from the City of Clearlake, the watershed is relatively undeveloped. The three Class III watercourses emanate from the west side of Highway 53, where vineyards dominate. The immediate vicinity of Ogulin Canyon Road is undeveloped. Aside from any road or vineyard influences, the immediate watershed operates naturally.

8.3. Fish & Wildlife Impact Avoidance and Minimization Measures

8.3.1. Periodic Biological Monitoring and Worker Training

If expansion of the proposed operation is planned in the future, it is recommended that a wildlife survey be conducted annually to ensure that no wildlife or special-status species are present in, or adjacent to, operational areas. The Parcel contains suitable nesting habitat for various bird species because of the presence of trees and brush. No nests or nesting activity was observed in the operational areas during the field survey because it was conducted outside of the typical nesting season for birds.

Although birds can nest in all habitats, including the ground, riparian corridors are focal areas for birds. Riparian vegetation and trees must be inspected for the presence of active bird nests before tree felling or ground clearing. If active nests are present in the project area during construction of the project, CDFW should be consulted to develop measures to avoid “take” of active nests prior to the initiation of any construction activities. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site.

When workers are made aware of the importance of biological resources, they are better able to avoid resource impacts. When possible, periodically include environmental / biological information in your safety meetings or other staff meetings. Make workers aware that impacts to biological resources cause work delays and may result in serious penalties. Establish an effective communication chain to report any potential resource questions or conflicts to the cultivation manager, who can contact the on-call consulting biologist.

Should any biological issues arise please contact:

- Project Biologist, Dr. Geo Graening at (916) 452-5442.

8.3.2. Protection of Waterbodies and Sensitive Habitats

Potential adverse impacts to water resources could occur during cultivation activities by modification or destruction of stream banks or riparian vegetation, the filling of wetlands, or by increased erosion and sedimentation in receiving water bodies due to soil disturbance. The cultivation operations are over 50 feet away from the nearest water feature, an ephemeral stream. An intermittent stream is located over 100 feet away. There is no evidence that project implementation will impact any water resources. Water resource protection will be achieved by

compliance with this Plan and compliance with the State Water Board's Cannabis Cultivation General Order.

Because the total area of ground disturbance required for construction activities of the cultivation operation is greater than 1 acre, the landowner or cultivator will need to enroll for coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 2009-0009-DWQ) and implement a storm water pollution prevention plan.

If operational activities occur near sensitive habitats, it is recommended that signage and/or fencing be erected that identifies the resource and limits entry to these areas. Security fencing that surrounds the cultivation compounds can function as wildlife exclusion devices. It is recommended that fencing be constructed to prevent passage of wildlife into the cultivation areas through or over the fencing.

Due to setback requirements and presence of vegetation in buffers, there will be no significant impacts to aquatic habitat.

If development of the project will result in the removal of commercial tree species, one of the following permits is needed from CalFire: Less than 3 Acre Conversion Exemption; Christmas Tree; Dead, Dying or Diseased, Fuelwood, or Split Products Exemption; a Public Agency, Public and Private Utility Right of Way Exemption; a Notice of Exemption from Timberland Conversion Permit for Subdivision; or an Application for Timberland Conversion Permit.

8.3.3. Operational Best Management Practices

The implementation of best management practices during construction and operations will ensure that biological resources are protected. The following are suggested practices and rules to be implemented:

- Restrict vehicular traffic to existing access roads whenever possible.
- Reduce vehicle speeds, especially on roadways.
- Minimize water usage
- Do not litter: litter attracts animals.
- Do not feed wildlife. Pets are not allowed within operational areas.
- No hunting or collecting of any animals or plants.
- Use tobacco products only in approved areas.
- Check under tires and equipment for resting animals.
- Use only designated toilet facilities.
- Implement an effective pollution prevention plan. By ensuring that potential pollutants, such as sediment and petroleum products, do not contaminate waterways or natural habitats, biological resources will be better protected.

8.4. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

9.0 OPERATIONS MANUAL

9.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section that is an Operations Manual:

(a) Intent: To describe the operating procedures of the commercial cannabis cultivation site to ensure compliance with the use permit, protect the public health, safety and welfare, as well as the natural environment of Lake County.

(b) This section shall include the following:

- 1. Authorization for the County, its agents, and employees, to seek verification of the information contained within the development permit or use permit applications, the Operations Manual, and the Operating Standards at any time before or after development or use permits are issued;*
- 2. A description of the staff screening processes;*
- 3. The hours and days of the week when the facility will be open;*
- 4. [blank]*
- 5. Description of measures taken to minimize or offset the carbon footprint from operational activities;*
- 6. Description of chemicals stored, used and any effluent discharged as a result of operational activities.*

(c) Grounds.

(1) The permittee shall establish and implement written procedures to ensure that the grounds of the premises controlled by the permittee are kept in a condition that prevents the contamination of components and cannabis products. The methods for adequate maintenance of the grounds shall include at minimum:

- i. The proper storage of equipment, removal of litter and waste, and cutting of weeds or grass so that the premises shall not constitute an attractant, breeding place, or harborage for pests.*
- ii. The proper maintenance of roads, yards, and parking lots so that these areas shall not constitute a source of contamination in areas where cannabis products are handled or transported.*
- iii. The provision of adequate draining areas in order to prevent contamination by seepage, foot-borne filth, or the breeding of pests due to unsanitary conditions.*
- iv. The provision and maintenance of waste treatment systems so as to prevent contamination in areas where cannabis products may be exposed to such a system's waste or waste by-products.*

(2) If the lot of record is bordered by grounds outside the applicant's control that are not maintained in the manner described in subsections (a) through (d) of this section, inspection, extermination, and other reasonable care shall be exercised within the lot of record in order to eliminate any pests, dirt, and/or filth that pose a source of cannabis product contamination.

(d) Any other information as may be requested by the Director and/or by the Planning Commission.

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"All lights used for cannabis related permits including indoor or mixed light cultivation of cannabis shall be fully contained within structures or otherwise shielded to fully contain any light or glare involved in the cultivation process. Artificial light shall be completely shielded between sunset and sunrise."

As this Operational Manual is refined and expanded, it may be bound separately.

9.2. Operational Information

9.2.1. Authorization of County Visits

One of the conditions of County licensing is that the cultivator give authorization for the County, its agents, and employees, to verify the information contained within the development

permit or use permit applications, the Operations Manual, and the Operating Standards, at any time before or after development or use permits are issued.

9.2.2. Staff Screening Process

The staff screening process will consist, at a minimum of: criminal reports / background checks; in-person interviews; and the requirement that all applicants must provide a comprehensive resume and contact info of several references.

9.2.3. Hours of Operation

This cultivation operation is closed to the public. Visitation is only allowed when specific permission is granted.

The cultivation operation hours of operation are:

Monday, from 8 a.m. to 5 p.m.

Tuesday, from 8 a.m. to 5 p.m.

Wednesday, from 8 a.m. to 5 p.m.

Thursday, from 8 a.m. to 5 p.m.

Friday, from 8 a.m. to 5 p.m.

Saturday, from 8 a.m. to 5 p.m.

Sunday, closed

9.2.4. Other Information

Measures that will be taken to minimize or offset the carbon footprint from operational activities are:

- energy-saving measures (see Energy Usage subsection)
- water-saving measures (see Water Use subsection)
- solid waste reduction measures (see Waste Management subsection)
- air emissions reduction measures (see Air Quality Management subsection)
- proper site selection, use of existing contours instead of mass grading
- cultivation of fast-growing plants, which remove carbon dioxide from the air and fix it in plant biomass

The description of chemicals stored and used, and any effluent discharged as a result of operational activities is found in the Fertilizer subsection, the Pesticide subsection, the Hazardous Waste Management portion of the Waste Management subsection, and the Stormwater Management Subsection.

9.3. Groundskeeping

Good housekeeping measures will be implemented. The grounds will be inspected at least once per day and any litter picked up. Trash containers will be emptied when full. Roads will be maintained so that significant erosion does not occur. This may include wetting dusty roads, armoring with gravel or asphalt, patching holes, and maintaining drainage features such

as water bars, culverts and side ditches. Weeds and grasses will be controlled by mulching or by cutting with a lawnmower or line trimmer. Drainage ditches and swales will regularly mowed and cleaned, including the removal of litter, debris, and sediment. Containers and ditches will be drained so that mosquitos do not breed. Areas inside cultivation compounds can be graveled or paved to prevent foot-borne filth. Live traps may be deployed to remove rodents from operational areas. Disposable coveralls (e.g. Tyvek) can be used to increase sanitation levels and reduce vectoring of mites and other pests. A clothing changing station / mudroom can be provided for employees so that street clothing is separated from cultivation clothing.

Property maintenance will follow Best Management Practices. The following CASQA Industrial and Commercial Handbook BMP Fact Sheets are applicable:

- BG-40 Landscape Maintenance
- SC-41 Building & Grounds Maintenance
- SC-40: Contaminated or Erodible Areas
- SC-43 Parking Area Maintenance
- SC-44 Drainage System Maintenance

Wastes will be managed as specified in the Waste Management subsection.

9.4. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

10.0 PEST MANAGEMENT

10.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Pest Management:

(a) Intent: To ensure consistency pest management with the other sections of the property management plan.

(b) This section shall describe how cultivation and nursery permittees will comply with the following pesticide application and storage protocols:

a. All pesticide applications must fully comply with the California Food and Agriculture Code, Division 6 Pest Control Operations and Division 7 Agriculture Chemical; Chapter 1 – 3.6 and California Code of Regulations, Division 6 Pest Control Operations.

b. These pesticide laws and regulations include but are not limited to:

i. Comply with all pesticide label directions;

ii. Store chemicals in a secure building or shed to prevent access by wildlife;

iii. Contain any chemical leaks and immediately clean up any spills;

iv. Prevent offsite drift;

v. Do not apply pesticides when pollinators are present;

vi. Do not allow drift to flowering plants attractive to pollinators;

vii. Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;

viii. Do not apply pesticides when they may reach surface water or groundwater; and

ix. Only use properly labeled pesticides.

x. The use of pesticides shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.

c. This section shall include a map of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 100 feet of the lot of record and a 100 foot setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

“The use of any pesticide that has been banned for use in the state is prohibited.”

A Site Management Plan was prepared for this project and is bound separately:

- Natural Investigations Co. 2020. Site Management Plan for the Cultivation Operations at 1000 and 1270 Highway 53, Unincorporated Clear Lake County, California. Prepared for the RWQCB. October 2019.

10.2. Inventory of Pesticides

Under state and federal law, a pesticide is any substance intended to control, destroy, repel, or otherwise mitigate a pest. Any organism that causes damage or economic loss, or transmits or produces disease, may be the target pest. Pests can be insects or animals (e.g. mice), unwanted plants (weeds) or organisms that cause plant diseases. “Pesticide” is an umbrella term that includes many kinds of chemicals—natural and synthetic. A pesticide is any substance intended to control, destroy, repel or attract a pest. Any living organism that causes damage, economic loss, and/or transmits or produces disease may be the target pest. Some common pesticides include insecticides, herbicides, rodenticides, molluscicides, fungicides,

repellents, disinfectants and sanitizers. (California Department of Pesticide Regulation fact sheet, available at <http://www.cdpr.ca.gov/>).

At this cultivation operation, pests will be controlled by employing only approved, organic-certified pesticides. Weeds will be controlled using a line trimmer or mulch; herbicides will not be used. Live traps will be used for rodents. The following pesticides may be used at this facility, as needed:

- 1-gallon bottles of alcohol
- *Bacillus subtilus*
- *Bacillus thuringensis*
- Neem oil and mineral oil

Note that the Department of Pesticide Regulation has developed a brief synopsis of appropriate pesticide usage called *Legal Pest Management Practices for Marijuana Growers in California* which can be found as Attachment D in Order R5-2015-0113. Currently, no regulated pesticides are registered for use on Cannabis. Therefore, commercial cultivators are limited to only using pesticides that are exempt from residue-tolerance requirements and are either: (1) registered and labeled for a use that is broad enough to include use on cannabis (e.g., unspecified green plants), or (2) exempt from registration requirements as a minimum-risk pesticide under FIFRA Section 25(b). The CA Department of Pesticide Regulation lists allowable pesticides in their publication “Legal Pest Management Practices for Marijuana Growers in California.” This publication is presented in the Appendix.

10.3. Pesticide Application and Storage Protocols

Note that the Department of Pesticide Regulation has developed a brief synopsis of appropriate pesticide usage called *Legal Pest Management Practices for Marijuana Growers in California* which can be found as Attachment D in Order R5-2015-0113. Currently, no pesticides are registered for use on Cannabis. Therefore, commercial cultivators are limited to only using pesticides that are exempt from residue-tolerance requirements and are either: (1) registered and labeled for a use that is broad enough to include use on cannabis (e.g., unspecified green plants), or (2) exempt from registration requirements as a minimum-risk pesticide under FIFRA Section 25(b).

The CDFA CalCannabis Program describes pesticide use as follows:

“Although California Department of Pesticide Regulation (CDPR) is responsible for managing California’s statewide pesticide regulatory program, the local enforcement of pesticide use regulations is delegated to County Agricultural Commissioners (CACs). With oversight by CDPR, CACs plan and develop county programs and regulate pesticide use to ensure that applicators comply with label directions and pesticide laws and regulations (CDPR 2011). CACs oversee pesticide use reporting, promote best management practices, and monitor field applications, and they may assist in cleanup of accidental pesticide spills.

CACs inspect operations and records of growers, nonagricultural (including industrial and institutional) applicators, pest control dealers, agricultural pest control advisers

(PCAs), farm labor contractors, and government agencies for compliance with worker protection standards and other pesticide safety requirements. CACs, assisted by CDPR, investigate incidents in which pesticides harm agricultural workers, people nearby, and the environment, including environmental damage (such as fish or wildlife kills) and water quality contamination. When an enforcement action is needed, CACs have the option to revoke or suspend the right of a company to do business in their county or to issue civil or criminal penalties (CDPR 2011)....License and certificate types issued by CDPR under the pesticide regulatory program include, but are not limited to, the following (CDPR 2017).....

Because there are no restricted-use pesticides registered for use on cannabis, application of pesticides for cannabis cultivation would not require any type of license or certificate. Cultivators, however, may obtain a QAC or QAL, or private applicator certificate, or hire individuals with these credentials, in order to avail themselves of information such as proper mixing, loading, and application techniques and selection and use of personal protective equipment. Cannabis cultivators would not necessarily be required to obtain the services of a PCA but, nonetheless, may choose to do so in order to get professional advice on pest control.” (CDFA 2017)

Cultivators must comply with pesticide laws and regulations as enforced by the Department of Pesticide Regulation. The CDFA CalCannabis Licensing Program has the following pesticide application and storage protocols, which will be implemented:

- (1) Comply with all pesticide label directions;
- (2) Store chemicals in a secure building or shed to prevent access by wildlife;
- (3) Contain any chemical leaks and immediately clean up any spills;
- (4) Apply the minimum amount of product necessary to control the target pest;
- (5) Prevent offsite drift;
- (6) Do not apply pesticides when pollinators are present;
- (7) Do not allow drift to flowering plants attractive to pollinators;
- (8) Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
- (9) Do not apply pesticides when they may reach surface water or groundwater; and
- (10) Only use properly labeled pesticides. If no label is available consult the Department of Pesticide Regulation.

Pesticides will be used according to the instructions on the label or the material safety data sheets (MSDS). County regulations also apply to listed pesticides. Pesticides will be stored in a stormproof shed, Conex container, or the metal building so that stormwater is not contaminated. Chemicals will be properly labeled and open containers sealed when stored. When handling chemicals, staff will use personal protective equipment such as safety glasses, gloves, dust mask or respirator, boots, pants and long-sleeved shirt. Pesticides will not be applied on windy days or within 24 hours of a forecasted rain event.

10.4. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

11.0 SECURITY

11.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Security:

(a) Intent: To minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The Applicant shall provide adequate security on the premises, as approved by the Sheriff and pursuant to this section, including lighting and alarms, to ensure the safety of persons and to protect the premises from theft.

(b) Security Plan. This section shall include at a minimum:

a. A description of the security measures to be taken to:

(1) Prevent access to the cultivation site by unauthorized personnel and protect the physical safety of employees. This includes, but is not limited to:

i. Establishing physical barriers to secure perimeter access and all points of entry (such as locking primary entrances with commercial-grade, non-residential door locks, or providing fencing around the grounds, driveway, and any secondary entrances including windows, roofs, or ventilation systems);

ii. Installing a security alarm system to notify and record incident(s) where physical barriers have been breached;

iii. Establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and/or visitors;

iv. Maintaining the premises such that visibility and security monitoring of the premises is possible; and

v. Establishing procedures for the investigation of suspicious activities.

(2) Prevent theft or loss of cannabis and cannabis products. This includes but is not limited to:

i. Establishing an inventory system to track cannabis material and the personnel responsible for processing it throughout the cultivation process;

ii. Limiting access of personnel within the premises to those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties;

iii. Supervising tasks or processes with high potential for diversion (including the loading and unloading of cannabis transportation vehicles); and

iv. Providing designated areas in which personnel may store and access personal items.

(3) Identification of emergency contact(s) that is/are available 24 hours/seven (7) days a week including holidays. The plan shall include the name, phone number and facsimile number or email address of an individual working on the commercial cultivation premises, to whom notice of problems associated with the operation of the commercial cultivation establishment can be provided. The commercial cultivation establishment shall keep this information current at all times. The applicant shall make every good faith effort to encourage neighborhood residents to call this designated person to resolve operating problems, if any, before any calls or complaints are made to the County.

(4) The permittee shall maintain a record of all complaints and resolution of complaints and provide a tally and summary of issues the annual Performance Review Report.

(5) A description of fences, location of access points, and how access is controlled.

(6) Video Surveillance.

i. At a minimum, permitted premises shall have a complete digital video surveillance system with a minimum camera resolution of 1280 X 720 pixel. The video surveillance system shall be capable of recording all pre-determined surveillance areas in any lighting conditions.

ii. The video surveillance system shall be capable of supporting remote access by the permittee.

iii. To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.

iv. Areas that shall be recorded on the video surveillance system include, but are not limited to, the following:

a. The perimeter of the cannabis cultivation site and cannabis nursery,

- b. Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises;*
 - c. Areas where cannabis is destroyed;*
 - d. Limited-access areas;*
 - e. Security rooms;*
 - f. Areas containing surveillance-system storage devices, in which case, at least one camera shall record the access points to such an area; and*
 - g. The interior and exterior of all entrances and exits to the cannabis cultivation sites and cannabis nursery including all buildings where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises.*
 - v. The surveillance system shall record continuously 24 hours per day and at a minimum of 30 frames per second.*
 - vi. All exterior cameras shall be waterproof, I-66 minimum.*
 - vii. All interior cameras shall be moisture proof.*
 - viii. Cameras shall be color capable.*
 - ix. Video management software shall be capable of integrating cameras with door alarms.*
 - x. Video recordings shall be digital.*
 - xi. Thermal technology shall be use for perimeter fencing.*
 - xii. All cameras shall include motion sensors that activates the camera when motion is detected.*
 - xiii. In areas with inadequate lighting for the cameras being used, sufficient lighting shall be provided to illuminate the camera's field of vision.*
 - xiv. All recording shall be located in secure rooms or areas of the premises in an access and environment-controlled environment which is separate from the room where the computer and monitoring equipment is located.*
 - xv. All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days.*
 - xvi. All video surveillance recordings are subject to inspection by the Department and shall be copied and sent, or otherwise provided, to the Department upon request.*
 - xvii. The video recordings shall display the current date and time of recorded events. Time is to be measured in accordance with the U.S. National Institute Standards and Technology standards. The displayed date and time shall not significantly obstruct the view of recorded images.*
- (7) Fences*
- i. All commercial cannabis cultivation sites shall be enclosed by a fence. The fence shall include, at a minimum, the following: Posts set into the ground. The posts may be steel tubing, timber or concrete and may be driven into the ground or set in concrete. End, corner or gate posts, commonly referred to as "terminal posts", must be set in concrete footing or otherwise anchored to prevent leaning under the tension of a stretched fence. Posts set between the terminal posts shall be set at intervals not to exceed 10 feet. A top horizontal rail is required between all posts. The fence shall be attached to the posts and top horizontal rail.*
 - ii. No barbed wire, razor wire or similar design shall be used.*
 - iii. The cultivation area shall be screened from public view. Methods of screen may include, but is not limited to, topographic barriers, vegetation, or solid (opaque) fences.*

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"All lights used for cannabis related permits including indoor or mixed light cultivation of cannabis shall be fully contained within structures or otherwise shielded to fully contain any light or glare involved in the cultivation process. Artificial light shall be completely shielded between sunset and sunrise.

Security lighting shall be motion activated and all outdoor lighting shall be shielded and downcast or otherwise positioned in a manner that will not shine light or allow light glare to exceed the boundaries of the lot of record upon which they are placed."

11.2. Security Measures

General security measures will consist of the following:

- A security plan, updated as needed
- staff screening process
- personnel rules and responsibilities (to be incorporated into an employee handbook in the future)
- physical barriers, including signage, road gates, security fencing with locked gates, and commercial-grade locks on all interior doors
- an alarm system that can notify security personnel and record incidents where physical barriers have been breached;
- theft and loss control program
- video surveillance system.

The Security Officer(s) for the cultivation site are:

- Larry Foster
- Laythen Martines

Any complaints or problems associated with the operation of the commercial cultivation establishment will be directed to the Security Officer. The Security Officer should make every good faith effort to encourage neighborhood residents to call the designated Security Officer to resolve operating problems, if any, before any calls or complaints are made to the County. The Security Officer should maintain a record of all complaints and resolution of complaints and provide a tally and summary of issues the annual Performance Review Report. The Staff Screening Process is described in the Operations Manual subsection of this Plan.

Personnel rules and responsibilities are as follows:

- Obey the rules of the Security Plan
- Sign in when entering the facility and sign out when exiting the facility
- Do not carry any weapons
- Do not engage in lengthy conversation with the public or respond directly to complaints: direct all such concerns to the Security Officer.
- Only authorized vehicles are allowed in operational areas.
- Do not bring backpacks or other unnecessary storage devices that might complicate the theft control program. Lockers will be provided for personal items.
- Do not enter restricted areas unless authorized to do so.

The cultivation operation is accessed from a private gravel road, Ogulin Canyon Road (see Map). There is a gate on Ogulin Canyon Road to the north; however, it is locked and not in use. Project access is from the south, approximately 1.45 miles from the intersection with Highway 53. Passage through two locked gates is required to access the property. First, there is a locked iron gate with cement posts on Ogulin Canyon, approximately 0.82-mile from Highway 53. The second gate is metal with metal posts and is located at the Project entrance.

The cultivation operations are closed to the public. Visitation is only allowed when specific permission is granted. All staff, all suppliers, all product transporters, and all visitor must sign

the log in / log out sheet. Signage will be posted that states that the operational areas have restricted access and are closed to the public. The signage will not advertise the presence of Cannabis products.

11.3. Theft and Loss Control

The County requires an inventory system to track Cannabis material and personnel handling of the material. This requirement will be fulfilled by following the requirements of the CalCannabis Licensing Program, which creates a Track-and Trace System. Sections 8401 through 8405 (quoted in part) state:

“The Department shall establish a track-and-trace system for unique identifiers of cannabis and nonmanufactured cannabis products, which all licensees shall use. Each licensee shall report in the track-and-trace system the disposition of immature and mature plants, as required by Section 8402 of this Chapter, and nonmanufactured cannabis products on the licensed premises and any transfers associated with commercial cannabis activity between licensees.

(a) The licensee is responsible for the accuracy and completeness of all data and information entered into the track-and- trace system. Data entered into the track-and-trace system is assumed to be accurate and can be used to take enforcement action against the licensee if not corrected.

(b) Attempts to falsify or misrepresent data or information entered into the track-and-trace system is a violation and subject to enforcement.

(c) Each licensee shall use the track-and-trace system for recording all applicable commercial cannabis activities. Each licensee shall do all of the following activities:

(1) Establish an account in the track-and-trace system prior to engaging in any commercial cannabis activities associated with their license and maintain an active account while licensed;

(2) Designate at least one of the owners or the responsible party named in the application to be the track-and-trace system administrator....”

For this cultivation site, the Track-And-Trace System Administrators are:

- Larry Foster
- Laythen Martines

Personnel will be granted access within the premises to only those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties. There will be supervision of tasks or processes with a high potential for diversion (including the loading and unloading of cannabis transportation vehicles). Supervision may include video surveillance and/or the requirement that the Security Officer or their designee be present.

11.4. Video Surveillance

The cultivation site and metal building will have a comprehensive digital video surveillance system. Each camera will have the following specifications:

- minimum resolution of 1280 x 720 pixels
- digitally record continuously 24 hours per day and at a minimum of 30 frames per second, color.
- exterior cameras shall be waterproof, I-66 minimum.
- interior cameras shall be moisture proof.
- display the current date and time of recorded events

- interior cameras shall have motion sensors that activates the camera when motion is detected.
- sufficient lighting shall be provided to illuminate the camera's field of vision
- thermal (infra-red) motion sensing technology shall be use for perimeter fencing.

The video management software shall be capable of integrating cameras with door alarms. The video surveillance system shall be capable of recording all pre-determined surveillance areas in any lighting conditions. The video surveillance system shall be capable of supporting remote access by the permittee. To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.

Areas that shall be recorded on the video surveillance system include, but are not limited to, the following:

- a. The perimeter of the cannabis cultivation site and cannabis nursery,
- b. Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises;
- c. Areas where cannabis is destroyed;
- d. Limited-access areas;
- e. Security rooms;
- f. Areas containing surveillance-system storage devices, in which case, at least one camera shall record the access points to such an area; and
- g. The interior and exterior of all entrances and exits to the cannabis cultivation sites and cannabis nursery including all buildings where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises.

All recording shall be located in secure rooms or areas of the premises in an access and environment-controlled environment which is separate from the room where the computer and monitoring equipment is located. All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days. Data transfer will be by coax cable or by Wi-Fi router. Power supplies shall be self-contained, such as solar arrays and batteries.

11.5. Gates and Fencing

There is a large locked gate on Ogulin Canyon Road, and then another locked gate at the entrance to the northern parcel (APN 010-055-27), which provides access to the southern parcel as well. The cultivation site will be enclosed with a sturdy fence. The posts should be set in the ground and should be made of steel tubing or lumber. Terminal posts should be set in concrete or otherwise anchored to prevent leaning under the tension of stretched fence panels. Post interval should not exceed 10 feet. A top horizontal rail should be installed between each post interval. Fence panels should consist of metal mesh "cyclone" fabric or welded wire mesh. Barbed wire or razor wire is prohibited from use on the top rails. If required by the County, opaque screening will be added: this may consist of plastic slats for cyclone fencing or plastic woven fabric (e.g. wind screens). The fenced cultivation compound will be setback approximately 250 feet from Ogulin Canyon Road, which has limited access due to locked gates. Also, trees along Ogulin Canyon Road partially obscure the eastern

border of the compound. Trees located between Highway 53 and the compound provide a complete visual barrier to the western border. The southern and northern compound borders are visually blocked by topography and trees. The fenced cultivation compound will have 1 gate. The gate will consist of metal tube frame and the paneling will be the same as described above. The gate should be large enough for a service vehicle to ingress/egress. The gate will be secured with a metal padlock. Keys or lock combinations should be controlled by the Security Officer.

11.6. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

12.0 STORM WATER MANAGEMENT

12.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Storm Water Management:

- (a) Intent: To protect the water quality of the surface water and the stormwater management systems managed by Lake County and to evaluate the impact on downstream property owners.*
- (b) All permittees shall manage storm water runoff to protect downstream receiving water bodies from water quality degradation.*
- (c) All cultivation activities shall comply with the California State Water Board, the Central Valley Regional Water Quality Control Board, and the North Coast Region Water Quality Control Board orders, regulations, and procedures as appropriate.*
- (d) Outdoor cultivation, including any topsoil, pest management, or fertilizer used for the cultivation cannabis shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.*
- (e) The illicit discharge of irrigation or storm water from the premises, as defined in Title 40 of the Code of Federal Regulations, Section 122.26, which could result in degradation of water quality of any water body is prohibited.*
- (f) All permittees shall prepare a Storm Water Management Plan based on the requirements of the California Regional Water Quality Control Board Central Valley Region or the California Regional Water Quality Control Board North Coast Region to be approved by the Lake County Water Resources Department. In addition to those requirements, the plan shall include:*
 - a. Identification of any Lake County maintained drainage or conveyance system that the stormwater is discharged into and documentation that the stormwater discharge is in compliance with the design parameters of those structures.*
 - b. Identification of any public roads and bridges that are downstream of the discharge point and documentation that the stormwater discharge is in compliance with the design parameters of any such bridges.*
 - c. Documentation that the discharge of stormwater from the site will not increase the volume of water that historically has flow onto adjacent properties.*
 - d. Documentation that the discharge of stormwater will not increase flood elevations downstream of the discharge point.*
 - e. Documentation that the discharge of stormwater will not degrade water quality of any water body.*
 - f. Documentation of compliance with the requirements of Chapter 29, Storm Water Management Ordinance of the Lake County Ordinance Code.*
 - g. Describe the proposed grading of the property.*
 - h. Describe the storm water management system.*
 - i. Describe the best management practices (BMPs) that will be used during construction and those that will be used post-construction. Post-construction BMPs shall be maintained through the life of the permit.*
 - j. Describe what parameters will be monitored and the methodology of the monitoring program.*

12.2. List of Responsible Parties and Contact Information

The Stormwater Manager(s) currently assigned to the cultivation operations are:

- Larry Foster
- Laythen Martines
- the Stormwater Management Consultant is: Dr. G.O. Graening, QSD #00473, QISP #597.

The stormwater manager shall have primary responsibility and significant authority for the implementation, maintenance, inspection, and amendments to the Stormwater Management Plan. Duties of the stormwater manager include but are not limited to:

- Ensuring full compliance with the Plan and the Chapter 29, Storm Water Management Ordinance of the Lake County Ordinance Code;
- Implementing all elements of the Plan, including but not limited to implementation of prompt and effective erosion and sediment control measures, and implementing all non-storm water management, and materials and waste management activities (such as monitoring discharges (dewatering, diversion devices); general site clean-up; vehicle and equipment cleaning, fueling and maintenance; spill control; ensuring that no materials other than storm water are discharged in quantities which will have an adverse effect on receiving waters or storm drain systems; etc.);
- Inspections (pre-storm, during storm, and post-storm) or designating qualified personnel to do so;
- Routine inspections as specified in the cultivation operation's specifications or described in the Plan;
- Preparing any annual compliance certification;
- Ensuring elimination of all unauthorized discharges;
- The storm water manager shall be assigned authority to mobilize crews to make immediate repairs to the control measures;
- Coordinate with the landowner or cultivator to assure all the necessary corrections/repairs are made immediately, and that the project complies with the Plan and relevant permits.

12.3. Compliance

12.3.1. Setbacks and Buffers

The Ordinance requires that all cultivation operations be located at least 100 feet away from all waterbodies (i.e. spring, top of bank of any creek or seasonal stream, edge of lake, wetland or vernal pool).

The Water Board requires a 100-foot setback from low risk Class II watercourses and a 50-foot setback from low risk Class III watercourses. The operational area is at least 100 feet from the Class II watercourse and 50 feet from the Class III watercourses. These setbacks comply with the Cannabis General Order setback requirements.

12.3.2. Water Board Permitting

This cultivation operation is enrolled as a Tier II / Low Risk cultivation operation in the State Water Resources Control Board's *Order WQ 2017-0023-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Note also that a sediment and erosion control plan is being implemented as part of the larger Site Management Plan (bound separately):

- Natural Investigations Co. 2019. Site Management Plan for the Cultivation Operations at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared for the RWQCB. October 2019.

12.3.3. Grading, Discharge Flows, and Downstream Effects

The cultivation operations will not significantly alter the hydrology of the two parcels. The southern parcel will not be graded or affected. Minor grading will occur within the cultivation operation area on the northern parcel to fill in low spots and ensure a generally consistent sloping surface that will continue to sheet flow. Although minor grading may occur for maintenance, no roads will be paved. Establishment of the cultivation operations will require the construction of a new 40-foot by 60-foot buildings. This building, along potentially a small shed, Conex container, and small mixed light greenhouse will be the only impervious surfaces. Final engineering designs of the metal building will include specifications for gutter systems that preferably disperse water to the downhill side of the building. Gravel will be installed around the building to prevent erosion from stormwater water runoff from gutters.

There are culverts and an asphalted low water road surface at existing stream crossings that will not be disturbed unless otherwise required by CDFW during section 1600 or Clean Water Act permitting processes, which include avoidance and minimization measures to protect water quality at those locations.

The large vegetated buffers surrounding this facility serve to moderate stormflows and regulate stream volumes such that flooding can be completely avoided. These large vegetated buffers allow stormwater that is discharged from operation areas to be slowed, filtered, and percolate into soils. In general, stormwater on the parcel infiltrates the soil. Should a new facility be planned and constructed that would significantly impact hydrological function, the Ordinance requires documentation that downstream hydrology and public roads and bridges will not be negatively impacted.

12.4. Storm Water Management

12.4.1. Water Pollution Control Schedule

BMPs should be deployed in a sequence to follow the progress of site preparation / tilling / cultivation. As the locations of soil disturbance change, erosion and sedimentation controls should be adjusted accordingly to control storm water runoff at the downgrade perimeter and drain inlets. BMPs should be mobilized as follows:

- Year-round:
 - The site manager or stormwater manager should monitor weather using National Weather Service reports (<https://www.weather.gov/>) to track conditions and alert crews to the onset of rainfall events.
 - Disturbed soil areas should be stabilized with temporary erosion control or with permanent erosion control as soon as possible after grading or construction is complete.
- During the rainy season:
 - Disturbed areas should be stabilized with temporary or permanent erosion control before rain events.
 - Disturbed areas that are substantially complete should be stabilized with permanent erosion control (soil stabilization) and vegetation (if within seeding window for seed establishment).

- Prior to forecast storm events, temporary erosion control BMPs should be deployed and inspected.
- During the non-rainy season:
 - The project schedule should sequence earth-moving activities with the installation of both erosion control and sediment control measures. The schedule should be arranged as much as practicable to leave existing vegetation undisturbed until immediately prior to grading.

Sufficient quantities of temporary sediment control materials should be maintained on-site throughout the duration of the project, to allow implementation of temporary sediment controls in the event of predicted rain, and for rapid response to failures or emergencies. This includes implementation requirements for active areas and non-active areas before the onset of rain. The following table summarizes the general schedule of implementation of site BMPs.

Water Pollution Control Schedule

Phase, Activity, or Milestone	Date
File any needed permit registration documents	immediately
Implementation of rainy season BMPs	October 1 st of every year
Rainy season begins	October 15
Implementation of dry season BMPs	April 1 st of every year
Dry season begins	April 15
Repair / replacement of erosion control devices	see BMP section of this Plan
Site inspections	see Inspection section of this Plan
Submit Annual Report	annually, as required
Expansion / modification of cultivation operational area	modify this Plan within 30 days

12.4.2. Pollutant Source Identification

Inventory of Materials and Activities that May Pollute Storm Water

Construction or cultivation activities that have the potential to contribute sediment to storm water discharges include:

- Tilling, grading and excavation operations;
- Soil import/export operations;
- Structure installation process; and
- Paving operations.

The following table provides a list of materials that may be used and activities that may be performed that will have the potential to contribute pollutants, other than sediment, to storm water runoff.

Summary of Potential Project Pollutant Other Than Sediment

Activity/Material Type	Potential Pollutant
Vehicle lubricants and fuels, including oil, grease, diesel and gasoline, and coolants	Petroleum hydrocarbons, volatile organic compounds (VOCs)
Asphaltic emulsions associated with asphalt-concrete paving operations	Petroleum hydrocarbons, VOCs
Portland cement, masonry, and concrete products, muriatic acid, etc.	Materials with a low or high pH, materials with high alkalinity, metals
Road base and subbase material	Materials with high alkalinity or high pH, metals
Gardening materials and wastes	Pesticides, nutrient pollution (nitrates, phosphates, biological oxygen demand, etc.), metals
Treated lumber (materials and waste)	Arsenic, copper, other metals, creosote
Material packaging and site personnel	General litter (municipal solid waste, universal waste)
Portable toilets	Septic waste (fecal coliform, biological oxygen demand)

12.4.3. Existing (pre-construction) Control Measures

The following are existing (pre-construction) control measures within the project site:

- vegetated buffers
- sufficient buffer distances between cultivation areas and drainages
- gravel armoring on driveways and roads
- pipe culverts under roads
- preservation of existing vegetation in non-cultivation areas

12.4.4. Best Management Practices

Resources consulted for BMP selection included:

- Central Valley Region's Best Management Practices Manual for Cannabis Cultivation. Appendix A in: Waste Discharge Requirements for Cannabis Cultivation Order R5-2015-0113.
- California Stormwater Quality Association. 2011. California Stormwater Best Management Practice Handbook – Construction. California Stormwater Quality Association, Menlo Park, California 886 pp.
- California Stormwater Quality Association. 2014. Stormwater Best Management Practice Handbook Portal: Industrial and Commercial. California Stormwater Quality Association, Menlo Park, California. 474 pp.
- The California Department of Transportation's Construction Site BMPs Handbook, available electronically at <http://www.dot.ca.gov/hq/construc/stormwater/manuals.htm>
- The California Department of Transportation's Construction Site BMP Fact Sheets, available electronically at <http://www.dot.ca.gov/hq/construc/stormwater/factsheets.htm>
- USEPA NPDES Storm Water Program's National Menu of BMPs website at <http://www.epa.gov/npdes/stormwater/menuofbmps>

The following subsections discuss BMPs that have been selected for implementation in this project. Implementation and location of BMPs are shown on the Water Pollution Control

Drawings (WPCDs) in the map sections. The Appendix includes a list of the fact sheets of all the BMPs selected for this project.

Erosion Control

Erosion control, also referred to as soil stabilization, consists of source control measures that are designed to prevent soil particles from detaching and becoming transported in storm water runoff. Erosion control BMPs protect the soil surface by covering and/or binding soil particles. This project will implement the following practices for effective temporary and final erosion control during construction:

- Preserve existing vegetation where required and when feasible;
- Apply temporary erosion control to exposed areas. Reapply as necessary to maintain effectiveness;
- Implement temporary erosion control measures at regular intervals throughout the defined rainy season to achieve and maintain stability. Implement erosion control prior to the defined rainy season;
- Control erosion in concentrated flow paths by applying erosion control devices.
- Divert run-on and stormwater generated from within the facility away from all erodible materials; and
- If sediment traps or basins are installed, ensure that they are working properly and emptied of accumulated sediment and litter.

Specific erosion control BMPs that can be implemented are listed here and the Construction and Industrial BMP fact sheets are included in the Appendix:

- EC-2: Preservation of Existing Vegetation
- EC-3: Hydraulic Mulch
- EC-4: Hydroseeding
- EC-5: Soil Binders
- EC-6: Straw Mulch
- EC-7: Geotextiles & Mats
- EC-8: Wood Mulching
- EC-9: Earth Dikes & Drainage Swales
- SC-33: Outdoor Storage of Raw Materials
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip

Erosion and sediment control diagrams are provided in the Maps section that indicate the recommended type and placement of erosion control devices.

Sediment Control

Sediment controls are structural measures that are intended to complement and enhance the selected erosion control measures and reduce sediment discharges from active construction areas. Sediment controls are designed to intercept and settle out soil particles that have been detached and transported by the force of water. This project will incorporate sediment control measures as needed.

Specific sediment control BMPs that can be implemented are listed here and the Construction BMP Fact Sheets are included in the Appendix:

- SE-1: Silt Fence
- SE-3: Sediment Trap
- SE-5: Fiber Rolls
- SE-6: Gravel Bag Berm
- SE-8: Sand Bag Barrier
- SE-9: Straw Bale Barrier
- TC-32: Bioretention

Erosion and sediment control diagrams are provided in the Maps section that indicate the recommended type and placement of sediment control devices.

Road Maintenance

The properties contain access roads (see exhibits). This access road system consists of private unpaved roads. Ogulin County Road is relatively flat and well maintained. Dirt fire roads on the upper southern property are fairly steep, but will not be used in association with the cultivation operation. The dirt roads on the northern parcel are gradual and suitable for two-wheel drive passenger car travel. The two parcels have a total of three vehicle stream crossings (see Exhibits):

- a pipe culvert that conveys a Class II watercourse under the road to the cultivation area
- a pipe culvert that conveys a Class III water course under the entrance road, and
- an asphalt-surfaced low water crossing of a Class II watercourse at Ogulin Canyon Road

The access roads to be used for cultivation operations are typically lightly armored with gravel and follow ridgelines and gentle contours. The roads appeared to be in good working order during the September 2019 survey. However, additional gravel is recommended in general. There are no water bars or rolling dips currently; several water bars are recommended. Driveways and roads will be maintained so that significant erosion does not occur. This may include wetting dusty roads, armoring with gravel or asphalt, patching holes, and maintaining drainage features such as water bars, culverts, and side ditches.

The following guidebook should be referenced for road maintenance:

- Handbook for Forest, Ranch, & Rural Roads: A Guide for Planning, Designing, Constructing, Reconstructing, Upgrading, Maintaining, and Closing Wildland Roads.
[available at:
<http://www.pacificwatershed.com/sites/default/files/RoadsEnglishBOOKapril2015b.pdf>]

Monitoring / BMP Inspection and Maintenance

Sufficient quantities of temporary sediment control materials should be maintained on-site throughout the rainy season to allow implementation of temporary erosion and sediment controls in the event of predicted rain and for rapid response to failures or emergencies.

A visual monitoring (inspection) program should be implemented, and an inspection would ideally be performed prior to each qualifying rain event and contain the following focal areas:

- All storm water drainage areas to identify any spills, leaks, or uncontrolled pollutant sources
- All BMPs to identify whether they have been properly implemented
- Any storm water storage and containment areas to detect leaks and ensure maintenance of adequate freeboard

Note that stormwater sampling procedures are discussed in the Water Use subsection.

Training

A copy of the Plan should be made available to the site personnel or contractor representatives engaged in the maintenance or installation of BMPs. Site inspectors observing pollution caused by ineffective construction or cultivation practices should inform site personnel of appropriate and proper erosion and sedimentation control practices, along with special follow-up inspection for further training. The Stormwater Manager or general contractor should organize orientation sessions with all installation, inspection, and maintenance personnel upon initiation of a specific project activity or change in key personnel. These sessions should be setup to ensure that all contractor and sub-contractor operations are implemented in accordance with this Plan. Training sessions should be included as part of regular safety meetings to familiarize works with the requirements of the Plan.

12.5. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

13.0 WASTE MANAGEMENT

13.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Waste Management:

(a) Intent: To minimize the generation of waste and dispose of such waste properly, to prevent the release of hazardous waste into the environment, minimize the generation of cannabis vegetative waste and dispose of cannabis vegetative waste properly, and manage growing medium and dispose of growing medium properly.

(b) This section shall include the following components:

a. Solid Waste Management

The solid waste section shall include:

- 1. Provide an estimate of the amount of solid waste that will be generated on an annual basis and daily during peak operational seasons, broken down into the following categories: paper; glass; metal; electronics; plastic; organics; inerts; household hazardous waste; special waste, and mixed residue*
- 2. Describe how the permittee will minimize solid waste generation, including working with vendors to minimize packaging.*
- 3. Describe the waste collection frequency and method.*
- 4. Describe how solid waste will be temporarily stored prior to transport to a compost, recycling, or final disposal location.*
- 5. Describe the composting, recycling, or final disposal location for each of the above categories of solid waste.*

b. Hazardous Waste Management

The hazardous waste section shall include:

1. Hazard Analysis.

The applicant shall conduct a hazard analysis to identify or evaluate known or reasonably foreseeable hazards for each type of cannabis product produced at their facility in order to determine whether there exist any hazards requiring a preventive control. The hazard analysis shall include:

The identification of potential hazards, including:

- i. Biological hazards, including microbiological hazards;*
- ii. Chemical hazards, including radiological hazards, pesticide(s) contamination, solvent or other residue, natural toxins, decomposition, unapproved additives, or food allergens; and/or*
- iii. Physical hazards, such as stone, glass, metal fragments, hair or insects.*

The evaluation of the hazards identified in order to assess the severity of any illness or injury that may occur as a result of a given hazard, and the probability that the hazard will occur in the absence of preventive controls.

The hazard evaluation shall consider the effect of the following on the safety of the finished cannabis product for the intended consumer:

- i) The sanitation conditions of the manufacturing premises;*
- ii) The product formulation process;*
- iii) The design, function and condition of the manufacturing facility and its equipment;*
- iv) The ingredients and components used in a given cannabis product;*
- v) The operation's transportation and transfer practices;*
- vi) The facility's manufacturing and processing procedures;*
- vii) The facility's packaging and labeling activities;*
- viii) The storage of components and/or the finished cannabis product;*
- ix) The intended or reasonably foreseeable use of the finished cannabis product.*
- x) Any other relevant factors.*

(2) Management Plan

The Management Plan shall:

- i. Identify all Resource Conservation and Recovery Act (RCRA), Non-RCRA hazardous waste and Universal wastes and the volume of each.*

- ii. Identify all containers and container management.
- iii. Describe storage locations and chemical segregation procedures.
- iv. Describe hazardous waste manifest and recordkeeping protocol.
- v. Outline inspection procedures.
- vi. Identify emergency spill response procedures.
- vii. Describe staff responsibilities.
- viii. Describe the staff training program.
- ix. Describe the methodology on how the amount of hazardous materials and waste that is generated on the site, the amount that is recycled, and the amount and where hazardous materials and waste is disposed of, is measured, and
- x. Include a map of any private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record or within 100 feet of the lot of record and a 100 foot setback from any identified private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. The map shall also include any public water supply well on the lot of record or within 200 feet of the lot of record and a 200 foot setback from any public water supply well.

Pursuant to the California Health and Safety Code, the use of hazardous materials shall be prohibited except for limited quantities of hazardous materials that are below State threshold levels of 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas. The production of any Hazardous Waste as part of the cultivation process is prohibited.

(c) Cannabis Vegetative Material Waste Management

The cannabis vegetative material waste management section shall include:

- (1) Provide an estimate of the type and amount of cannabis vegetative waste that will be generated on an annual basis.
- (2) Describe how the permittee will minimize cannabis vegetative waste generation.
- (3) Describe how solid waste will be disposed.
- (4) Describe the methodology on how the amount of cannabis vegetative waste that is generated on the site, the amount that is recycled, and the amount and where cannabis vegetative waste is disposed of is measured.

(d) Growing Medium Management

The growing medium management section shall include:

- (1) Provide an estimate of the type and amount of new growing medium that will be used and amount of growing medium will be disposed of on an annual basis.
- (2) Describe how the permittee will minimize growing medium waste generation.
- (3) Describe any non-organic content in the growing medium used (such as vermiculite, silica gel, or other non-organic additives).
- (4) Describe how growing medium waste will be disposed.
- (5) Describe the methodology on how the amount of growing medium waste that is generated on the site, the amount that is recycled, and the amount and where growing medium waste is disposed of, is measured.

13.2. Solid Waste Management

13.2.1. Solid Waste Sources and Volumes

The volume of solid waste generated at the cultivation site is estimated below on a peak daily basis and an annual basis, in pounds.

Estimated Solid Waste Generation

	Annual Basis (pounds per year)	Peak daily (pounds per day)
Paper	5	<1
Glass	10	<1
Metal	10	<1
Electronics	1	n/a
Plastic	100	10
Organics	1,000	100
Inerts*	10	<1
Household hazardous waste	1	n/a
Special waste	1	n/a
Mixed residue	10	<1
* Inert waste is waste which is neither chemically nor biologically reactive and will not decompose. Examples are sand and concrete.		

13.2.2. Waste Collection, Storage, and Disposal

At least one waste bin will be located within the fenced area of the cultivation site. Waste bins will consist of trash cans (20 or 35 gallon) with lids or roll-off dumpsters with lids. The locations of waste bins / containers are shown in the Maps section.

Recyclables will be segregated from solid waste and stored in at least one bin. At weekly intervals, staff should transfer them by truck in trash cans, with tight lids or plastic garbage bags and tarped loads and deposit them in an appropriate recycling facility. Recyclables such as scrap metal, glass, metal and plastic containers, can be conveniently unloaded at a recycling drop-off center (a Lake County Integrated Waste Management facility or private facility). Cardboard and newspaper may be recycled or mixed in with other composting materials.

Yard waste, green waste, and other compostable materials will be segregated from the solid waste and shredded and composted onsite for reuse as mulch or as a soil amendment, or deposited at an appropriate transfer facility. Compost and recyclable wood can be dropped off at any compost facility where it is processed as new compost. Household toxic materials will be segregated from the solid waste and disposed of at a Lake County Integrated Waste Management facility.

Waste will be hauled to an appropriate licensed facility by a private waste-hauling contractor, such as Waste Management, Inc., or C & S Waste Solutions, or by cultivation operation staff. The Lake County Integrated Waste Management facilities are:

- Eastlake Landfill, 16015 Davis Ave, Clearlake
- Lake County Waste Solutions Transfer Station and Recycling Center, 230 Soda Bay Road, Lakeport

- South Lake Refuse and Recycling Center, 16015 Davis Street, Clearlake
- Quackenbush Mountain Resource Recovery and Compost Facility, 16520 Davis Street, Clearlake

The following material handling and waste management measures will be implemented:

- Prevent or minimize handling of wastes that can be readily mobilized by contact with stormwater during a storm event;
- Contain all stored wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by the wind or contact with stormwater during handling;
- Cover waste disposal containers and material storage containers when not in use;
- Divert run-on and stormwater generated from within the facility away from all stockpiled materials;
- Clean all spills of wastes that occur during handling in accordance with the spill response procedures); and
- Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that can be contaminated by contact with chemical/industrial materials or wastes.

A sandbag barrier (Construction BMP Factsheet SE-8) can be placed around waste storage areas to prevent stormwater run-on from adjacent upstream areas. Materials can be elevated with pallets or cement blocks to minimize contact with stormwater. Spill clean-up materials, material safety data sheets, a material inventory, and emergency contact numbers should be maintained and stored in the residence or shipping container.

To reduce or eliminate pollution of storm water from stockpiles of soil and cultivation materials, stockpiles should be surrounded with sediment controls (Construction Factsheets BMP SE-5: Fiber Rolls, SE-8: Sandbag Barrier, and WM-3 Stockpile Management) as needed. Plastic covers can be used, as needed, before rain events or before strong winds begin.

BMPs will be implemented to minimize storm water contact with waste materials and prevent waste discharges (Construction Factsheet BMP WM-5 Solid Waste Management). Solid waste should be removed and disposed off-site at least weekly at a proper receiving facility. Any chemicals will be stored in the shipping containers or sheds. Chemical wastes will be appropriately and clearly marked in containers and segregated from other non-waste materials.

Storage of soil amendments and chemicals should employ the following CASQA Industrial BMP fact sheets:

- SC-31: Outdoor Liquid Container Storage
- SC-32: Outdoor Equipment Operations
- SC-33: Outdoor Storage of Raw Materials
- SC-34: Waste Handling and Disposal
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip.

13.2.3. Solid Waste Reduction

The CDFA CalCannabis Program states, “*Cultivators must comply with the California Integrated Waste Management Act of 1989, which requires that all California cities and counties reduce, recycle, and compost at least 50 percent of wastes by 2000.*” (CDFA 2017)

Solid waste should be reduced using some combination of the following strategies and activities:

- Provide filtered water and dedicated cups instead of bottled water for staff.
- Use biodegradable containers.
- Use durable materials to reduce the use of disposable materials.
- Preferably select vendors that use reusable packaging and shipping containers; encourage vendors to do so.
- Minimize the volume of packaging material required by selecting products packaged efficiently or by buying in bulk.
- Grow cannabis plants in the ground instead of in bags, where possible.
- Employ soil fertility practices, such as nitrogen fixation cover crops and mulching, to reduce the importation of fertilizers and soil amendments.
- Use electricity-powered vehicles and equipment and install a solar array and battery storage.

13.3. Hazards and Hazardous Waste

13.3.1. Hazard Analysis

The CalCannabis Licensing Program regulations (Section 8102[b][19]) would require that applicants have conducted a hazardous materials record search of the EnviroStor database for the proposed premises. If hazardous sites were encountered, the regulations require that applicants provide documentation of protocols implemented to protect employee health and safety.

The following hazardous materials databases were queried on October 2, 2020:

- EnviroStor is an online search and Geographic Information System tool for identifying sites that have known contamination or sites for which there may be reasons to investigate further. The EnviroStor database includes the following site types: Federal Superfund sites (National Priority List); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. The online mapper is available at: <https://www.envirostor.dtsc.ca.gov/public/map/>
- GeoTracker is a geographic information system maintained by the California State Water Resources Control Board (SWRCB) that provides online access to environmental data at the Internet address (URL) = <http://geotracker.waterboards.ca.gov/>.

The EnviroStor and GeoTracker databases did not report contamination cases or hazardous material usage on the Parcel or adjacent properties. The nearest contamination case is 2.9 miles away. The site survey revealed no evidence of buried storage tanks or soil contamination. There was no indication that the Parcel has previously been used for an industrial purpose.

This Hazard Analysis analyzes only the cultivation, harvest, trimming, and curing of Cannabis. Cannabis will not be processed or manufactured at this operation. If Cannabis is processed or manufactured at this facility, this Hazard Analysis will be expanded and revised.

Potential Biological Hazards

For unprocessed Cannabis, the primary biological hazard is microbiological, and specifically, fungal growth. In rare instances, some Cannabis crops can be contaminated with fecal coliforms that derive from soils or improper hygiene. Insects and arachnids, such as mites, could also be present on Cannabis product. For cultivation staff, the biological hazards are snake bites, insect stings, and weather exposure.

Potential Chemical Hazards

For unprocessed Cannabis, the primary chemical hazards are chemical residues: fertilizers; insecticides; and fungicides. Petroleum product usage could also lead to contamination of Cannabis product or soil. For cultivation staff, the chemical hazards are exposure to hazardous chemicals.

Potential Physical Hazards

For unprocessed Cannabis product, physical hazards include the introduction of material fragments such as stone, glass, metal fragments, or hair. Such contamination could occur from a variety of sources, such as fugitive dust, dirty containers during transport, etc. For cultivation staff, the physical hazards are cuts by sharp objects, crushing by falling objects, and weather exposure.

13.3.2. Hazard Evaluation

Evaluation of Biological Hazards

Arthropod infestations and fungal growths are common hazards. Arthropod infestations and fungal vectors and fungal growth will be controlled in various ways. Regular testing for fungal spores on raw product should be conducted. If a biological contaminant is found, the incident should be investigated to determine the source. Areas inside cultivation compounds can be graveled or paved to suppress dust and mud. Live traps may be deployed to remove rodents from operational areas. Disposable coveralls (e.g. Tyvek) can be used to increase sanitation levels and reduce vectoring of mites and other pests. A clothing changing station / mudroom can be provided for employees so that street clothing is separated from cultivation clothing. The number of workers and visitors should be minimized, as mites can travel on clothes. Increasing ventilation, such as the addition of fans, can lower humidity levels and discourage fungal growth.

To reduce the risk of snake bites, insect stings, and weather exposure, staff should be required to wear personal protective equipment and stay hydrated. These hazards are easily mitigated by taking care in the field.

Evaluation of Potential Chemical Hazards

Chemical contamination of raw product is possible, but unlikely. Regular testing for chemical residues on raw product should be performed. Chemical contamination can be reduced by

implementation of Best Management Practices, which are identified in other subsections of this Plan. The use of organic-certified chemicals will also reduce this hazard significantly.

For cultivation staff, the risk of chemical exposure can be reduced by the use of personal protective equipment and the implementation of Best Management Practices, which are identified in other subsections of this Plan.

Evaluation of Potential Physical Hazards

For unprocessed Cannabis product, contamination of raw product by physical residues is relatively common, but easy to avoid. Facilities should be kept as clean as possible. Disposable coveralls (e.g. Tyvek) can be used to increase sanitation levels. Plastic sheeting can be used when raw product must be handled or stored. Equipment, such as scissors and saws, will be sanitized with ethanol.

For cultivation staff, the risk of physical hazards can be reduced by the use of personal protective equipment.

13.4. Hazardous Waste Management Plan

Cannabis cultivation operations may involve the use of hazardous materials, such as fuel for power equipment and generators, and pesticides. Transport, storage, and use of these materials could endanger human health and the environment in the event that upset or accident conditions cause a release of the materials. Numerous existing laws and regulations are designed to prevent spills of hazardous materials and limit damage in the event that such materials are released. The CalCannabis Licensing Program would only authorize lawful cultivation activities that comply with existing laws regarding storage and use of hazardous materials. California Health and Safety Code provisions and the CalARP program would require any cannabis cultivation facility storing more than a threshold quantity of regulated substances to prepare a Hazardous Materials Business Plan. These plans would include emergency response procedures to coordinate response in the event of a release and chemical accident prevention measures. With adherence to existing hazardous materials laws, the risk of accidental releases of hazardous materials from cultivation activities that could cause substantial hazards is considered low.

In addition, the CalCannabis Licensing Program's environmental protection measures (Sections 8301[a][4], 8302[a][5], and 8313 of the proposed regulations, as provided in Appendix A) would minimize potential accidental releases of hazardous materials by requiring licensees to store chemicals in a secure building or shed, and to contain any chemical leaks and immediately clean up any spills. Therefore, the risk of accidental releases of hazardous materials from lawful cannabis cultivation operations would be lower than many other ongoing activities in the State, including existing unpermitted cannabis cultivation activities.

The Lake County Division of Environmental Health is the Certified Unified Program Agency (CUPA) for all of Lake County, dealing with hazardous waste and hazardous materials. The CUPA typically requires a Hazardous Materials Business Plan for the following volumes of hazardous materials: greater than 55 gallons of liquid; 200 standard cubic feet of compressed gas; or 500 pounds of a solid. All permittees shall manage all waste that is hazardous waste,

as defined in Section 40141 of Public Resources Code, in compliance with all applicable hazardous-waste statutes and regulations.

However, the Cannabis Ordinance 3084 limits use of hazardous materials to volumes less than the State threshold: 55 gallons of a liquid; 500 pounds of a solid; or 200 cubic feet of a gas. Ordinance 3084 also prohibits the generation of hazardous waste as part of the Cannabis cultivation process.

Chemicals will be stored in a stormproof shed or Conex container so that stormwater is not contaminated. Chemicals will be properly labeled, properly segregated, and open containers sealed when not in use. Staff, when handling chemicals, will use personal protective equipment such as safety glasses, gloves, dust mask, boots, and pants and long-sleeved shirt. Chemicals pertaining to cultivation will be stored in a stormproof shed or Conex container. Chemicals pertaining to curing will be stored in a future curing shed. Chemicals will be properly labeled and open containers sealed when stored. Personal protective equipment such as safety glasses, gloves, dust mask, boots, and pants and long-sleeved shirt, will be used by staff when handling chemicals.

Gasoline in 1 or 5-gallon containers is used to fuel small engines such as an electrical generator, quad ATV, tillers and line trimmers. No significant quantities of petroleum products are currently used, with the exception of propane-fueled motor for the well water pump. All large equipment maintenance operations should typically occur at service stations outside of the Project Area. Should vehicle and equipment fueling or maintenance be performed in the Project Area, the following CASQA Industrial BMP fact sheets will be followed:

- SC-20: Vehicle and Equipment Fueling
- SC-21: Vehicle and Equipment Cleaning
- SC-22: Vehicle and Equipment Maintenance and Repair

Material Safety Data Sheets (MSDS) will be kept on file for each chemical used at this facility. MSDS sheets will be made available to all staff for viewing. When a new chemical is brought on to this facility, there should be a brief “tailgate” meeting to discuss proper storage, handling, and disposal of the chemical. MSDS for the facility are provided in the Appendix.

The CDFA CalCannabis Program concluded:

“With adherence to existing hazardous materials laws, the risk of accidental releases of hazardous materials from cultivation activities that could cause substantial hazards is considered low. In general, cannabis cultivation would not make intensive use of hazardous materials. In addition, the Proposed Program’s environmental protection measures (Sections 8301[a][4], 8302[a][5], and 8313 of the proposed regulations, as provided in Appendix A) would minimize potential accidental releases of hazardous materials by requiring licensees to store chemicals in a secure building or shed, and to contain any chemical leaks and immediately clean up any spills. Therefore, the risk of accidental releases of hazardous materials from lawful cannabis cultivation operations would be lower than many other ongoing activities in the state, including existing unpermitted cannabis cultivation activities.” (CDFA 2017)

“Cannabis cultivation sites may be located in areas of high risk for wildfire.” (CDFA 2017)

A sandbag barrier (Construction BMP Factsheet SE-8) can be placed around waste storage areas to prevent stormwater run-on from adjacent upstream areas. Sheds or shipping containers should be used to store hand tools, small parts, and most cultivation materials that can be carried by hand. Very large items can be stored in the open in the general storage areas. Such materials should be elevated with pallets or cement blocks to minimize contact with stormwater. Spill clean-up materials, material safety data sheets, a material inventory, and emergency contact numbers should be maintained and stored in the residence or shipping container.

To reduce or eliminate pollution of storm water from stockpiles of soil and cultivation materials, stockpiles will be surrounded with sediment controls (Construction BMP Factsheets SE-5: Fiber Rolls, SE-8: Sandbag Barrier, and WM-3 Stockpile Management) as needed. Plastic covers can be used, as needed, before rain events or before strong winds begin.

BMPs will be implemented to minimize storm water contact with waste materials and prevent waste discharges (Construction BMP Factsheet WM-5 Solid Waste Management). Solid waste should be removed and disposed off-site at least weekly at a proper receiving facility. Any chemicals will be stored in the shipping containers or sheds. Chemical wastes will be appropriately and clearly marked in containers and segregated from other non-waste materials.

Storage of soil amendments and chemicals should employ the following CASQA Industrial BMP Fact Sheets:

- SC-31: Outdoor Liquid Container Storage
- SC-32: Outdoor Equipment Operations
- SC-33: Outdoor Storage of Raw Materials
- SC-34: Waste Handling and Disposal
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip.

13.5. Pollution Prevention and Spill Response

A pollution prevention and spill response subplan was prepared in the following document:

- Natural Investigations Co. 2020. Site Management Plan for the Cultivation Operations at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared for the RWQCB. October 2020

This pollution prevention plan prescribes the following practices: good housekeeping; preventative maintenance; other BMPs; spill and leak prevention and response measures, and a monitoring program.

The spill prevention and control plan includes the following components:

- Maintenance of spill kit for petroleum hydrocarbons on site and in fuel supply trucks to include:
 - Containment drum;
 - Oleophilic absorbent pads; and
 - Granular spill absorbent suitable for petroleum, brake fluid, and antifreeze;
- Daily inspection of equipment for oil and fuel leaks;
- Fueling only in the designated area; and
- Training of personnel on handling of leaks (training at tailgate safety meetings).

13.6. Cannabis Vegetative Material Waste Management

13.6.1. Types and Volumes of Green Waste

The CDFA CalCannabis Program describes green waste as follows:

“Green waste is generated throughout the cannabis cultivation process. Some plants fail to reach maturity, pruning generates waste, nuisance weeds must be removed, and other plant material remains unused following harvesting, processing, and preparation for a new crop to be planted. Processing, including trimming, is described in Section 3.8 below.

Some cultivators may use sugar leaves, branch stalks, or stems for various cannabis or hemp products; typically, however, after the flowers are harvested, the remainder of the cannabis plant becomes green waste. Removal of some large plants, particularly in outdoor cultivation operations, may require a chainsaw due to the strength and thickness of the plant’s stem. Green waste is generally not piled and stored near active cannabis crops to avoid botrytis or other fungal pest issues that may occur on the waste and spread to the living cannabis plants. Disposal of green waste would follow procedures established by the Proposed Program. On-site composting is an option. If off-site disposal is used, the cultivator would make all cannabis waste unusable and unrecognizable before it leaves the licensed premises by grinding and mixing the green waste with non-consumable solid wastes such that the resulting mixture is at least 50 percent non-cannabis waste. Under Section 8305, Cannabis Waste Management, of the Proposed Program regulations, acceptable types of non-cannabis waste are any nonhazardous compostable materials, as defined in Title 14 of the California Code of Regulations at Section 17852(a)(11). After the waste is ground and mixed, licensees may dispose of it at a manned and permitted solid waste landfill, compostable materials handling facility, or in-vessel digestion facility as described in the regulations.” (CDFA 2017)

Sources of green waste on this cultivation operation consist of the following:

- mulch, humus, etc.
- landscape maintenance: lawn and weed trimmings, treated lumber, wood fencing, etc.
- Cannabis processing waste: leaves, stems, and root balls that remain after flower harvest, trimming, and grooming; whole dead plants; etc.

Volume of green waste generated by this cultivation operation is estimated at:

- two cubic yards per month per acre, or 24 cubic yards per year per acre.

Cannabis green waste should be weighed daily, weekly, or as needed, and data should be recorded for reporting requirements.

13.6.2. Handling and Disposal of Green Waste

There will be a dedicated area in the cultivation compound where Cannabis waste is handled. This area will be surveilled by video camera, and Cannabis waste will be weighed at regular intervals as part of the Track and Trace Program. Cannabis waste will be handled with appropriate personal protective equipment, including long-sleeved shirts, pants, boots, dust mask, eye protection, and gloves. Cannabis waste will either be composted onsite or disposed at a licensed landfill offsite after rendering it unconsumable.

Non-cannabis green waste can be shredded in a wood chipper, as necessary. Green waste can be mixed with soil and inoculated with humus. Compost heaps should be at least one cubic yard in size to generate and sustain necessary heat for composting (to sustain aerobic digestion). Compost heaps should be segregated into batches as they age, with humus being the resulting product after several weeks of composting. Compost heaps should be turned often to encourage aeration and aerobic digestion and supplemental water added to keep the heaps moist, but not wet (to discourage anaerobic digestion). Cannabis waste should be shredded and mixed with at least an equal amount of compostable materials such as food waste, yard waste, or growing medium (to render the cannabis unconsumable). Cannabis waste must be kept inside the locked fence or other locked compound at all times.

If cannabis waste is to be disposed offsite, it should first be shredded and blended with an equal part of non-consumable material, such as cardboard. Cannabis waste must be kept inside the locked garden area or other locked compound until ready for transport. It would then be transported as solid waste to the proper disposal facility (see Solid Waste Management Plan).

California Department of Food and Agriculture's CalCannabis Cultivation Licensing Program dictates specific Cannabis waste management practices, that will be adopted, as applicable, by this cultivation operation. The following draft regulations from the CalCannabis Cultivation Licensing Program are quoted as follows, and incorporated by reference:

§ 8305. Cannabis Waste Management

(a) For the purposes of this Chapter, "cannabis waste" is waste that is not hazardous waste as defined in Section 40141 of Public Resources Code, and is solid waste, as defined in Section 40191 of Public Resources Code, that contains cannabis and that has been made unusable and unrecognizable in the manner prescribed in subsection (e). A licensee may not sell cannabis waste.

(b) A licensee shall manage all waste that is hazardous waste, as defined in Section 40141 of Public Resources Code, in compliance with all applicable hazardous-waste statutes and regulations.

(c) A licensee shall dispose of cannabis waste as identified in the licensee's Cultivation Plan approved by the Department. A licensee shall not dispose of cannabis waste in an unsecured waste receptacle, whether in the control of the licensee or not.

(d) Cannabis that a licensee intends to render into cannabis waste shall be held in the designated holding area for a minimum of 72 hours. A licensee shall affix to each batch one or more documents with batch information and weight. At no time during the 72-hour hold period may the cannabis be handled, moved, or rendered into cannabis waste. The cannabis the licensee intends to render into cannabis waste is subject to inspection by the Department.

(e) A licensee shall make cannabis into cannabis waste by rendering the cannabis unusable and unrecognizable. The licensee shall render the cannabis into cannabis waste before

removing the cannabis waste from the licensed premises. A licensee shall render the cannabis into cannabis waste by grinding and incorporating the cannabis with other ground material so that the resulting mixture is at least 50 percent noncannabis material by volume. A licensee shall render cannabis into cannabis waste and track that waste by batch.

(f) Cannabis that a licensee wishes to deposit at a compostable materials handling facility or at an in-vessel digestion facility may be rendered cannabis waste by incorporating any nonhazardous compostable material, as defined in Title 14 of the California Code of Regulations at Section 17852 (a)(11), that a compostable materials handling facility or in-vessel digestion facility may lawfully accept.

(g) Unless a licensee will compost onsite, after a licensee renders the cannabis into cannabis waste, a licensee shall do one of the following with the cannabis waste:

- (1) Dispose of the cannabis waste at a manned and fully permitted solid waste landfill;
- (2) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted compostable materials handling facility; or
- (3) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted in-vessel digestion facility.

(h) In addition to all other tracking requirements set forth in Sections 8404 and 8405 of this Chapter, a licensee shall use the track-and-trace system and onsite documents to ensure the cannabis waste materials are identified, weighed, and tracked while on the licensed premises and when disposed of or deposited in accordance with subsection (g).

(i) A licensee shall enter the date and time that the cannabis was rendered cannabis waste and the weight of the resulting cannabis waste into the track-and-trace database.

(j) A licensee shall maintain accurate and comprehensive records regarding cannabis waste material that account for, reconcile, and evidence all activity related to the generation and disposal or disposition of cannabis waste. A licensee shall obtain a record from the solid waste facility evidencing the acceptance of the cannabis waste material at the facility. The record shall contain the name and address of the facility, the date, and the volume or weight of the cannabis waste accepted. These documents are records subject to inspection by the Department and shall be kept in compliance with Section 8400 of this Chapter.

(k) A licensee shall enter the date and time of the disposal or deposit of the cannabis waste at a solid waste facility, compostable materials handling facility, or an in-vessel digestion facility into the track-and-trace system.

13.7. Growing Medium Management

The CDFA CalCannabis Program describes soils handling as follows:

“Soils used in cannabis cultivation may be treated, reused, stockpiled, and/or discarded. For reuse, soils are piled and covered with tarps for an extended period (months to a year) to allow heat from sunlight to destroy any potential soil pathogens or pests. Another practice for soil reuse is to run a compost tea through the soils between harvests to restore soil nutrients. Although it is not a direct component of the Proposed Program, another aspect of soil reuse can include laboratory testing of soil samples to identify nutrient deficiencies or other issues. Identifying such deficiencies allows the soil to be properly treated or amended with fertilizers or other soil amendments, thereby correcting these deficiencies, prior to being reused with a new cannabis crop.” (CDFA 2017)

“Outdoor cultivation typically involves planting rooted cannabis cuttings or seeds in the early spring and harvesting the plants in the fall (mid-September through November), after the plants flower. Soils used in the pots or grow bags are typically amended to ensure that nutrients are available to the plants throughout the growing season. Compost teas, which are created by steeping compost material in water, may also be used to fulfill nutrient needs (Ingham 2014).

Water and nutrient supplement needs for outdoor cultivation may vary depending on the type of growing container selected. For example, raised beds typically require more watering and additional liquid nutrient application compared to other growing container options.” (CDFA 2017)

For the purposes of this Plan, growing medium consists of soil and non-organic amendments (vermiculite, perlite, silica gel, etc.). It does not include fertilizers or organic amendments such as mulch, humus, worm castings, etc. See the Fertilizer subsection of this Plan for a discussion of organic amendments.

13.7.1. Types and Volumes of Growing Medium

The growing medium for this cultivation operation will be native soil amended with imported organics and/or dry fertilizer. Exact volumes are not known at this time. Planting rows will be tilled or furrowed.

13.7.2. Growing Medium Handling, Disposal, and Waste Reduction

Growing media waste can be reduced or eliminated by composting and blending old soils with new soils and amendments. No significant amounts of growing media are expected to be disposed. Instead, media is reduced in volume yearly because it is absorbed by the plants and metabolized by soil organisms (bacteria, fungi, invertebrates). Soil staging areas and compost piles will be located inside the fenced compound. BMPs will be employed to ensure that these piles do not contaminate stormwater or cause nuisance dust or odor issues.

13.8. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

14.0 WATER RESOURCES

14.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must discuss Water Resources.

14.2. Description of Water Resources

The Lake County Groundwater Management Plan, together with the Lake County Water Inventory and Analysis (CDM 2006) and the Lake County Water Demand Forecast (CDM 2006), serve to manage the water resources in Lake County and provide a framework for the County and other water users to implement effective water resource management programs.

An informal assessment for the presence of potentially-jurisdictional water resources within the Property was also conducted during the field surveys in September 2019 and October 2020 by qualified biologists (Natural Investigations Co., Inc.). The following water features were detected within the Property during the field survey (see Exhibits):

- an unnamed intermittent (Class II) watercourse
- three unnamed ephemeral (Class III) watercourses

All Class III watercourses emanate from culverts along the western border. The smallest briefly crosses the southwest corner of the Property before entering an adjacent vineyard. The other two are approximately 2-foot wide on average and have a cobble or gravel substrate; these enter a Class II watercourse along Ogulin Canyon road on the eastern border of the Property, which is approximately 8-foot wide on average and has a gravel substrate. This watercourse flows to the south and small sections of it contain aquatic vegetation, such as rush (*Juncus* sp.). There are no vernal pools or other isolated wetlands in the Property.

The unnamed Class II watercourse eventually flows into Clear Lake, which is the source of Cache Creek. Additional discussion of the watershed can be found in the Fish and Wildlife Management subsection of this Plan.

The cultivation project should not divert surface water. State permits are needed to use surface water.

The Cannabis cultivation operations will use water from permitted agricultural wells. Three wells exist on the Property. There are two wells, one propane powered pump in a pumphouse, and an 8,000 gallon cement cistern on the northern parcel. There is one well and an 8,000 gallon cement cistern on the southern parcel.

According to maps in the Lake County Groundwater Management Plan, the Project Area appears to be located within the Burns Valley Groundwater Management Plan Area.

14.3. Water Resource Protection

This Property has three vehicle stream crossings (see Exhibits). The two properties have three vehicle stream crossings (see Exhibits):

- a pipe culvert that conveys a Class II watercourse
- a pipe culvert that conveys a Class III watercourse, and
- an asphalt low water crossing of a Class II watercourse at Ogulin Canyon Road

These crossings are permitted under several Streambed Alteration Agreements with CDFW. Proper road maintenance procedures are detailed in other sections of this Plan.

This cultivation operation is enrolled as a Tier II / Low Risk cultivation operation in the State Water Resources Control Board's *Order WQ 2017-0023-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Note also that a sediment and erosion control plan is being implemented as part of the larger Site Management Plan:

- Natural Investigations Co. 2020. Site Management Plan for the Cultivation Operations at 1000 and 1270 Highway 53, unincorporated Clearlake, California. Prepared for the RWQCB. October 2020.

Potential adverse impacts to water resources could occur during construction by modification or destruction of stream banks or riparian vegetation, the filling of wetlands, or by increased erosion and sedimentation in receiving water bodies due to soil disturbance. Project implementation will not directly impact any channels or wetlands. Soil disturbance from project implementation could increase erosion and sedimentation. Regulations at both the County and State levels require creation and implementation of an erosion control plan / stormwater management plan. Furthermore, if the total area of ground disturbance from project implementation is greater than 1 acre, the project proponent will need to enroll for coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 2009-0009-DWQ).

It is recommended that a formal delineation of jurisdictional waters be performed before construction work, or ground disturbance, is performed near any wetland or drainage.

14.3.1. Avoidance and Minimization Measures

Zoning Setbacks and Site Selection

The County's Cannabis Ordinance requires that all cultivation operations be located at least 100 feet away from all waterbodies (i.e. spring, top of bank of any creek or seasonal stream, edge of lake, wetland or vernal pool). The State Water Resources Control Board's Cannabis General Order requires various setbacks depending upon the type of waterbody (see following table). This cultivation operation is located as far away as possible from waterbodies and in a relatively flat area of the Parcel to reduce the potential for water pollution.

Minimum Riparian Setbacks¹

Common Name	Watercourse Class	Distance (Low Risk ²)	Distance (Mod Risk ²)	Variance ³
Perennial watercourses, springs, or seeps	I	150 ft.	200 ft.	Compliance Schedule
Intermittent watercourses	II	100 ft.	150 ft.	Compliance Schedule
Ephemeral watercourses	III	50 ft.	100 ft.	Compliance Schedule
Other waterbodies (lakes, etc.) and wetlands		150 ft.	200 ft.	Compliance Schedule

- 1 Riparian setbacks do not apply to man-made irrigation canals, water supply reservoirs, and hydroelectric canals (Watercourse Class IV) that do not support native aquatic species, however cannabis cultivators shall ensure land disturbance, cannabis cultivation activities, and facilities are not located in or disturb the existing riparian and wetland riparian vegetation associated with these Watercourse Class IV waterbodies.
- 2 Risk is defined in Table 1 of this Policy and is based on the natural (prior to land disturbance activities) surface topography.
- 3 Variance to riparian setbacks is only allowed if consistent with this Policy and a work plan and compliance schedule are approved by the applicable Regional Water Board Executive Officer.

Vegetative Buffers

Existing vegetative buffers exist between the proposed cultivation operation and nearby water resources. These vegetated areas will be preserved as much as possible. The exceptions are any fire breaks needed for wildfire protection. Areas that are covered in natural habitats should not be trimmed.

14.3.2. Best Management Practices

Water resource protection BMP's were identified and discussed in the Stormwater Management subsection.

14.4. Water Quality Monitoring Program**14.4.1. Objectives**

The Project Site Monitoring Program should be developed and implemented to address the following objectives:

- To demonstrate that the site is in compliance with all permits and ordinances;
- To determine whether non-visible pollutants are present at the project site and are causing or contributing to exceedances of water quality objectives;
- To determine whether immediate corrective actions, additional BMP implementation, or Plan revisions are necessary to reduce pollutants in storm water discharges and authorized non-storm water discharges; and
- To determine whether BMPs indicated in the Plan are effective in preventing or reducing pollutants in storm water discharges and authorized non-storm water discharges.

Note that water quality monitoring and sampling is also required under the State Water Board's Cannabis General Order.

14.4.2. Types of Inspections and Frequency

Based on the project site's location, construction / cultivation periods, and rainfall erosivity factor, this project should perform inspections at the following times: beginning of the rain season; before and after any storm that produces over 1 inch of rain; and during any storm that produces a significant stormwater discharge. Each inspection event should be logged in the Inspection Log in this Plan or in a separate binder.

The inspectors should be prepared to collect samples and conduct visual inspections. Inspectors are not required to physically collect samples or conduct visual inspections under the following conditions:

- During dangerous weather conditions such as flooding and electrical storms; and
- Outside of scheduled site business hours.

14.4.3. Inspection and Sampling Personnel

All inspection and sampling activities should be performed by the stormwater manager until site personnel are properly trained to take over these tasks. The name(s) and contact number(s) of the assigned inspection and sampling personnel are:

- staff (to be determined)

- Jess Gregory, P.E. (Gregory Engineering)
- Dr. G.O. Graening, QSD #00473, QISP #597 (Natural Investigations Co.).

14.4.4. Record Keeping and Reports

The site manager or storm water manager should retain records of all storm water monitoring information and copies of all reports for a period of at least three years. Each inspection event can be logged in the Inspection Log in a binder. These records include:

- The date, place, time of facility inspections, sampling, visual inspections, and/or measurements, including precipitation;
- The individual(s) who performed the facility inspections, sampling, visual inspections, and or measurements;
- The date and approximate time of analyses;
- The individual(s) who performed the analyses;
- Rain gauge readings from site inspections;
- Non-storm water discharge inspections and visual inspections and storm water discharge visual observation records;
- Visual observation and sample collection exception records; and
- The records of any corrective actions and follow-up activities that resulted from analytical results, visual inspections, or inspections.

14.4.5. Visual Inspection Plan

The inspector is only required to conduct visual observations (inspections) during business hours only. Within 2 business days (48 hours) prior to significant rain events, the inspector should visually observe (inspect):

- All storm water drainage areas to identify any spills, leaks, or uncontrolled pollutant sources (if needed, the site manager should implement appropriate corrective actions);
- All BMPs to identify whether they have been properly implemented in accordance with the Plan (if needed, the site manager shall implement appropriate corrective actions); and
- Any storm water storage and containment areas to detect leaks and ensure maintenance of adequate freeboard.

The inspector should conduct during-rain event visual observations (inspections) at regular intervals during extended storm events. The inspector should visually observe (inspect) storm water discharges at all discharge locations. Within two business days (48 hours) after major rain events, the inspector should conduct post rain event visual observations (inspections) to (1) identify whether BMPs were adequately designed, implemented, and effective, and (2) identify additional BMPs and revise the Plan accordingly.

For the visual inspections described above, the inspector should observe the presence or absence of floating and suspended materials, a sheen on the surface, discolorations, turbidity, odors, and source(s) of any observed pollutants. The inspector should maintain on-site records of all visual observations (inspections), personnel performing the observations, observation dates, weather conditions, locations observed, and corrective actions taken in response to the observations.

14.4.6. Sampling Plan for Pollutants

Water sampling is only required if a significant water pollution event occurs. The inspector should analyze one or more effluent samples for any parameters indicating the presence of pollutants during any breach, malfunction, leakage, or spill observed during a visual inspection which could result in the discharge of pollutants to surface waters that would not be visually detectable in storm water. Samples of discharge should be collected at the designated sampling locations shown on the WPCDs for observed breaches, malfunctions, leakages, spills, operational areas, soil amendment application areas, and historical site usage areas that triggered the sampling event.

The inspector should analyze samples for all applicable pollutant parameters. The inspector should collect a sample of storm water that has not come in contact with the disturbed soil or the materials stored or used on-site (uncontaminated sample) for comparison with the discharge sample. The inspector should compare the uncontaminated sample to the samples of discharge using field analysis or through laboratory analysis. The inspector should keep all field /or analytical data. Samples should be analyzed for the applicable constituents using the USEPA analytical methods.

14.4.7. General Sampling Methodology

The storm water manager should designate and train personnel to collect, maintain, and ship samples in accordance with the Surface Water Ambient Monitoring Program's 2008 Quality Assurance Program Plan. The storm water manager should ensure that testing laboratories will receive samples within 48 hours of the physical sampling (unless otherwise required by the laboratory), and should use only the sample containers provided by the laboratory to collect and store samples.

The storm water manager should ensure that all sampling and sample preservation are in accordance with the current edition of "Standard Methods for the Examination of Water and Wastewater" (American Public Health Association). All monitoring instruments and equipment (including a discharger's own field instruments for measuring pH and turbidity) should be calibrated and maintained in accordance with manufacturers' specifications to ensure accurate measurements. The storm water manager should ensure that all laboratory analyses are conducted according to test procedures under 40 Code of Federal Regulations Part 136, unless other test procedures have been specified in this General Permit or by the Regional Water Board. With the exception of field analysis conducted by the inspectors for turbidity and pH, all analyses should be sent to and conducted at a laboratory certified for such analyses by the State Department of Health Services.

An adequate stock of monitoring supplies and equipment for monitoring non-visible pollutants should be available on the project site prior to a sampling event. Monitoring supplies and equipment should be stored in a cool-temperature environment that will not come into contact with rain or direct sunlight. Sampling personnel should be available to collect samples in accordance with the sampling schedule. Supplies maintained at the project site should include, but are not limited to, surgical gloves, sample collection equipment, coolers, appropriate number and volume of sample bottles, identification labels, re-sealable storage bags, paper towels, personal rain gear, ice, Sampling Activity Log forms, and Chain of Custody

(COC) forms. The storm water manager should obtain and maintain the field-testing instruments for analyzing samples in the field by trained sampling personnel.

Grab samples should be collected and preserved in accordance with the applicable test method. Only personnel trained in proper water quality sampling should collect samples. Samples should be collected by placing a separate lab-provided sample container directly into a stream of water down gradient and within close proximity to the potential non-visible pollutant discharge location. This separate lab-provided sample container should be used to collect water, which should be transferred to sample bottles for laboratory analysis. The up gradient and uncontaminated background samples should be collected first prior to collecting the down gradient to minimize cross-contamination. The sampling personnel should collect the water upgradient of where they are standing. Once the separate lab-provided sample container is filled, the water sample should be poured directly into sample bottles provided by the laboratory for the analyte(s) being monitored. To maintain sample integrity and prevent cross-contamination, sampling collection personnel should:

- Wear a clean pair of surgical gloves prior to the collection and handling of each sample at each location;
- Not contaminate the inside of the sample bottle by not allowing it to come into contact with any material other than the water sample;
- Discard sample bottles or sample lids that have been dropped onto the ground prior to sample collection;
- Not leave the cooler lid open for an extended period of time once samples are placed inside;
- Not sample near a running vehicle where exhaust fumes may impact the sample;
- Not touch the exposed end of a sampling tube, if applicable;
- Avoid allowing rainwater to drip from rain gear or other surfaces into sample bottles;
- Not eat, smoke, or drink during sample collection;
- Not sneeze or cough in the direction of an open sample bottle;
- Minimize the exposure of the samples to direct sunlight, as sunlight may cause biochemical transformation of the sample to take place;
- Decontaminate sampling equipment prior to sample collection using a laboratory-grade soapy water wash, distilled water rinse, and final rinse with distilled water; and
- Dispose of decontamination water/soaps appropriately; i.e., not discharge to the storm drain system or receiving water.

Immediately following collection, samples for field analysis will be tested in accordance with the field instrument manufacturer's instructions and results recorded on the Sampling Activity Log. Immediately following collection, sample bottles for laboratory analytical testing should be capped, labeled, documented on a COC form provided by the analytical laboratory, sealed in a re-sealable storage bag, placed in an ice-chilled cooler, at as near to 4 degrees Celsius as practicable, and delivered within 24 hours to a California state-certified laboratory.

14.5. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

Sample Collection, Preservation, and Analysis for Monitoring Non-visible Pollutants

Constituent	Analytical Method	Minimum Sample Volume	Sample Bottle	Sample Preservation	Reporting Limit	Maximum Holding Time
VOCs-solvents	EPA 8260B	3 × 40 mL	VOA-glass	Store at 4° C, HCl to pH<2	1 µg/L	14 days
SVOCs	EPA 8270C	1 × 1 L	Glass-amber	Store at 4° C	10 µg/L	7 days
Pesticides	EPA 8081A	1 × 1 L	Glass-amber	Store at 4° C	0.1 µg/L	7 days
Herbicides	EPA 8151A	1 × 1 L	Glass-amber	Store at 4° C	Check lab	7 days
COD	EPA 410.4	1 × 250 mL	Glass-amber	Store at 4° C, H ₂ SO ₄ to pH<2	5 mg/L	28 days
TDS	EPA 160.1 (TDS)	1 × 100 mL	Polypropylene	None	ppm	Immediate
pH	EPA 150.1	1 × 100 mL	Polypropylene	None	Unitless	Immediate
Alkalinity	SM 2320B	1 × 250 mL	Polypropylene	Store at 4° C	1 mg/L	14 days
Nitrate	EPA 353.2	1 × 125 mL	Polypropylene	Store at 4° C, H ₂ SO ₄ to pH<2	Check lab	28 days
Phosphate	EPA 365.3	1 × 125 mL	Polypropylene	Store at 4° C	Check lab	28 days
Organic nitrogen	TKN – NH ₃	1 × 1 L	Glass-amber	Store at 4° C, H ₂ SO ₄ to pH<2	Check lab	28 days
TOC	EPA 415.1	1 × 250 mL	Glass	Store at 4° C, H ₂ SO ₄ to pH<2	Check lab	28 days
Potassium	EPA 200.7	1 × 250 mL	Polypropylene	Store at 4° C, HNO ₃ to pH<2	0.1 mg/L	6 months
Phenols	EPA 8270C	1 × 1 L	Glass-amber	Store at 4° C	Check lab	7 days
Metals (Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Mo, Ni, Se, Na, Th, Va, Zn)	EPA 6010B/7470A	1 × 250 mL	Polypropylene	Store at 4° C, HNO ₃ to pH<2	0.1 mg/L	6 months
Metals (chromium VI)	EPA 7199	1 × 500 mL	Polypropylene	Store at 4° C	1 µg/L	24 hours

Notes:

°C = degree(s) Celsius

µg/L = microgram(s) per Liter

COD = chemical oxygen demand

DO = dissolved oxygen

EPA = U.S. Environmental Protection Agency

HCl = hydrogen chloride

H₂SO₄ = hydrogen sulfateHNO₃ = nitric acid

L = liter

mg/L = milligrams per liter

mL = milliliter(s)

ppm = parts per million

PCB = polychlorinated biphenyl

SVOC = semi-volatile organic compound

TDS = total dissolved solids

VOA = volatile organic analysis

VOC = volatile organic compound

15.0 WATER USE

15.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Water Use:

- (a) Intent: To conserve the County's water resources by minimizing the use of water.*
- (b) All permitted activities shall have a legal water source on the premises, and have all local, state, and federal permits required to utilize the water source. If the permitted activity utilizes a shared source of water from another site, such source shall be a legal source, have all local, state, and federal permit required to utilize the water source, and have a written agreement between the owner of the site where the source is located and the permitted activity agreeing to the use of the water source and all terms and conditions of that use.*
- (c) Permittee shall not engage in unlawful or unpermitted drawing of surface water.*
- (d) The use of water provided by a public water supply, unlawful water diversions, transported by a water hauler, bottled water, a water-vending machine, or a retail water facility is prohibited.*
- (e) Where a well is used, the well must be located on the premises or an adjacent parcel. The production well shall have a meter to measure the amount of water pumped. The production wells shall have continuous water level monitors. The methodology of the monitoring program shall be described. A monitoring well of equal depth within the cone of influence of the production well may be substituted for the water level monitoring of the production well. The monitoring wells shall be constructed and monitoring begun at least three months prior to the use of the supply well. An applicant shall maintain a record of all data collected and shall provide a report of the data collected to the County annually.*
- (f) Water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. The application shall notify the Department within 7 days of the emergency and provide the following information:*
 - a. A description of the emergency.*
 - b. Identification of the retail water supplier including license number.*
 - c. The volume of water supplied.*
 - d. Actions taken to prevent the emergency in the future.*
- (g) All permittees shall prepare a Water Use Management Plan to be approved by the Lake County Water Resources Department. Said plan shall:*
 - a. Identify the source of water, including location, capacity, and documentation that it is a legal source.*
 - b. Described the proposed irrigation system and methodology.*
 - c. Describe the amount of water projected to be used on a monthly basis for irrigation and separately for all other uses of water and the amount of water to be withdrawn from each source of water on a monthly basis.*

15.2. Water Use Management Plan

15.2.1. Water Sources and Metering

The Property does not have municipal water service. Three wells exist on the Property. There are two wells, one propane powered pump in a pumphouse, and an 8,000 gallon cement cistern on the northern parcel. There is one well and an 8,000 gallon cement cistern on the southern parcel. The Cannabis cultivation operations will use water from an existing groundwater well and 8,000-gallon concrete cistern on the northern parcel (see Maps). The capacity of each well is: _____ gallons per minute.

The cultivation site should not take water directly or divert from any watercourse. State permits are needed to divert surface water. Note that water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. The cultivator shall notify the Department within 7 days of the emergency and provide the following information: a description of the emergency; identification of the retail water supplier

including license number; the volume of water supplied; and actions taken to prevent the emergency in the future.

A water meter will be installed for the cultivation site; water consumption will be logged daily. A water budget will be created every year and water use efficiency will be analyzed for the previous year.

15.2.2. Estimated Water Use

Water use requirements for outdoor cannabis production are similar to water use requirements for other agricultural crops such as corn (CDFA 2017). CDFA (2017) reports the following regarding the water use for cannabis:

“According to Hammon et al. (2015), water use requirements for outdoor cannabis production (25-35 inches per year) are generally in line with water use for other agricultural crops, such as corn (20-25 inches per year), alfalfa (30-40 inches per year), tomatoes (15-25 inches per year), peaches (30-40 inches per year), and hops (20-30 inches per year). Lindsey (2012) similarly cites a University of California researcher who suggested that cannabis does well under irrigation management and, as a small-acreage crop, will use far less water than crops such as cotton. Estimates of daily water usage per cannabis plant range from 5 gallons (Live Science 2014) to 6-8 gallons (CDFW 2016).”

CDFA (2017) concludes the following regarding groundwater impacts from small cultivation operations:

“Based on the relatively low quantities of water use (from 0.002 to 1.8 acre-feet per year), the likelihood that an individual cultivator or group of cultivators using groundwater from a defined alluvial aquifer would, by themselves, cause substantial groundwater overdraft is considered unlikely, for several reasons. First, groundwater overdraft is typically caused by the combination of various uses in a basin and is not typically attributable to a particular user or set of users; in other words, it is typically a cumulative issue (which is discussed in more detail in Chapter 6, Cumulative Considerations). In addition, the size limitations for cultivation sites under the Proposed Program would limit the maximum extent of water use. For instance, the highest estimate, provided by Hammon et al. (2015), would result in less than 3 acre-feet of annual usage at the largest allowable cultivation site of 1 acre. Finally, no information is available to suggest that there would be high concentrations of cultivators using groundwater from an alluvial basin in a particular location in a manner that could substantially affect neighboring wells.” (pages 4.8-34 to 4.8-35)

Daily Water Consumption

The following estimates were used from the CalCannabis Environmental Impact Report (CDFA 2017):

- 500 Cannabis plants per acre, each requiring 6 gallons per day = 3,000 gallons per day for an acre of Cannabis canopy

This is equivalent to 2.1 gallons per minute for an acre of Cannabis canopy. The County will currently allow up to 5 acres of Cannabis canopy for this 105-acre property. Thus, the daily requirement is 10.5 gallons per minute for 5 acres of Cannabis canopy. The yield of the well

on the northern parcel is ____ gallons per minute. The yield of the well on the southern parcel is ____ gallons per minute. Thus, there is more than sufficient water supply on this Property to support 5 acres of Cannabis cultivation.

Annual Water Consumption

The Applicant estimates that the cultivation operation will require 500,000 gallons per year (= 1.5 acre feet per year). This is consistent with the range of values reported in the CalCannabis Environmental Impact Report = from 0.002 to 1.8 acre-feet per year. Using the assumptions of 3,000 gallons per day for 1 acre of Cannabis canopy, and 120 growing days, the typical estimated annual water demand is 360,000 gallons per acre per year (= 1 acre foot per year).

15.2.3. Water Conservation

Water conservation practices will be implemented, including some combination of the following strategies and actions:

- selection of plant varieties that are suitable for the climate of the region
- the use of driplines and drip emitters (instead of spray irrigation)
- mulching to reduce evaporation
- water application rates modified from data from soil moisture meters and weather monitoring
- rooftop water collection (where feasible and permitted)
- shutoff valves on hoses and water pipes
- daily visual inspections of irrigation systems
- immediate repair of leaking or malfunctioning equipment
- water metering and budgeting

CASQA Construction BMP Fact Sheet NS-1: Water Conservation Practices should be implemented to prevent discharges from water supply equipment. Water application rates should be minimized as necessary to prevent runoff and ponding and water equipment leaks should be repaired immediately. Implement Construction BMP Fact Sheet NS-7: Potable Water / Irrigation to manage the potential pollutants generate during discharges from irrigation lines and unplanned discharges from water sources.

15.2.4. Irrigation System

At the cultivation site, the water supply will fill an 8,000-gallon concrete cistern; a water meter will meter the water use. Water filtration systems may also be installed. This cistern will supply gravitational head to the irrigation system. PVC pipes will deliver the water to the planting stations. Mixing tanks (plastic IBC tote, 275 gallon) may be used for making compost tea (liquid soil amendments or fertilizers), and injected into these supply lines. At each planting station, black polyvinyl flexible tubes and drip emitters or drip tape will be used to irrigate the plants.

16.0 MONITORING AND REPORTING FOR COUNTY LICENSING

16.1. Requirements / Goals

According to the Ordinance, the licensee must perform annual compliance monitoring and prepare annual reports as follows:

6. Compliance Monitoring

- i. A compliance monitoring inspection of the cultivation site shall be conducted annually during growing season.*
- ii. The permittee shall pay a compliance monitoring fee established by resolution of the Board of Supervisors prior to the inspection.*
- iii. If there are no violations of the permit or state license during the first five years, the inspection frequency may be reduced by the Director to not less than once every five years.*

7. Annual Reports

i. Performance Review

(a) All cannabis permittees shall submit a "Performance Review Report" on an annual basis from their initial date of operation for review and approval by the Planning Commission. The Planning Commission may delegate review of the annual Performance Review Report to the Director at the time of the initial hearing or at any time thereafter. This annual "Performance Review Report" is intended to identify the effectiveness of the approved development permit, use permit, Operations Manual, Operating Standards, and conditions of approval, as well as the identification and implementation of additional procedures as deemed necessary. In the event the Planning Commission identifies problems with specific Performance Review Report that could potentially lead to revocation of the associated development or use permit, the Planning Commission may require the submittal of more frequent "Performance Review Reports."

(b) Pursuant to sub-section 6.i. above, the premises shall be inspected by the Department on an annual basis, or less frequently if approved by the Director. A copy of the results from this inspection shall be given to the permittee for inclusion in their "Performance Review Report" to the Department.

(c) Compliance monitoring fees pursuant to the County's adopted master fee schedule shall be paid by permittee and accompany the "Performance Review Report" for costs associated with the inspection and the review of the report by County staff.

(d) Non-compliance by permittee in allowing the inspection by the Department, or refusal to pay the required fees, or noncompliance in submitting the annual "Performance Review Report" for review by the Planning Commission shall be deemed grounds for a revocation of the development permit or use permit and subject the holder of the permit(s) to the penalties outlined in this Code.

17.0 LITERATURE CITED AND FURTHER READING

California Department of Food and Agriculture. 2017. CalCannabis Cultivation Licensing Program Draft Program Environmental Impact Report. State Clearinghouse #2016082077. Prepared by Horizon Water and Environment, LLC, Oakland, California. 484 pp.

California Stormwater Quality Association. 2011. California Stormwater Best Management Practice Handbook – Construction. California Stormwater Quality Association, Menlo Park, California 886 pp.

California Stormwater Quality Association. 2014. Stormwater Best Management Practice Handbook Portal: Industrial and Commercial. California Stormwater Quality Association, Menlo Park, California. 474 pp.

Central Valley Region's Best Management Practices Manual for Cannabis Cultivation. Appendix A in: Waste Discharge Requirements for Cannabis Cultivation Order R5-2015-0113.

Lake County Groundwater Management Plan. 2006. Lake County Watershed Protection District. Prepared by CDM in Cooperation with California Department of Water Resources, Northern District. 138 pp.

(http://www.co.lake.ca.us/Government/Directory/WaterResources/Programs/Groundwater_Management.htm)

Natural Investigations Co., Inc. 2019. Air Quality Impact Assessment for the Cannabis Cultivation Operation at 1000 and 1270 Highway 53, Unincorporated Lake County, California.

Natural Investigations Co., Inc. 2020. Biological Site Assessment for the Cannabis Cultivation Operation at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared October 2020. Prepared for Central Valley Regional Water Quality Control Board.

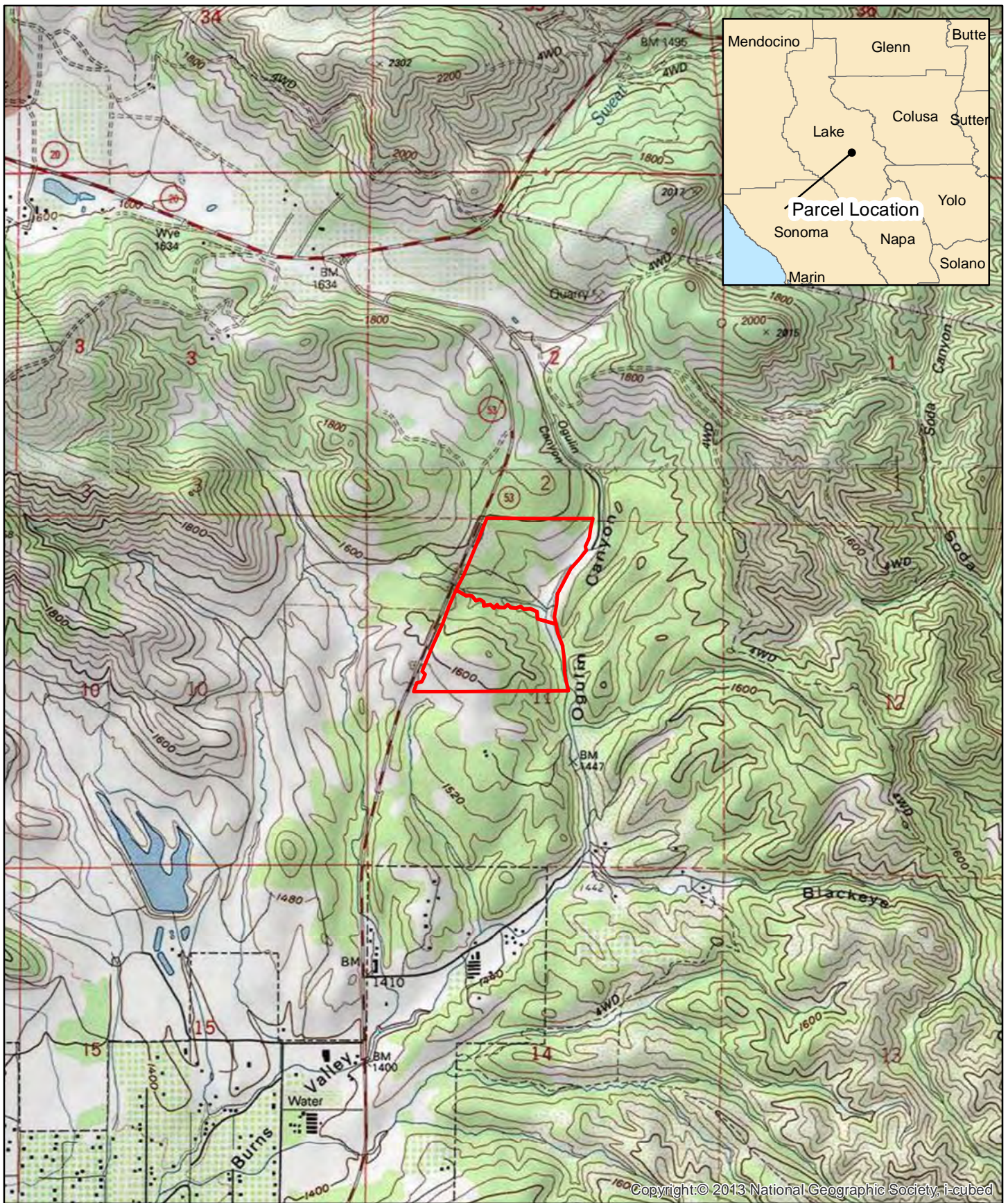
Natural Investigations Co. 2020. Cultural Resources Assessment for the Cannabis Cultivation Operation at 1000 and 1270 Highway 53, Lower Lake, Lake County, California. 29 pages

Natural Investigations Co., Inc. 2020. Nitrogen Management Plan for the Cannabis Cultivation at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared October 2020. Prepared for Central Valley Regional Water Quality Control Board.

Natural Investigations Co., Inc. 2020. Site Management Plan for the Cannabis Cultivation at 1000 and 1270 Highway 53, Unincorporated Lake County, California. Prepared October 2020. Prepared for Central Valley Regional Water Quality Control Board.

Newman, J. (editor). 2008. Greenhouse and Nursery Management Practices to Protect Water Quality. Publication Number: 3508. University of California Agriculture and Natural Resources Publications, Oakland, CA. 160 pp.

18.0 MAPS AND EXHIBITS



Parcel Location

0 0.5 1 Kilometers

0 0.5 1 Miles



1:24,000

1000 & 1270 Highway 53
Project Location Map



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Cultivation Areas Hwy 53 Project

APN 010-055-27

Phase 1
10 acres

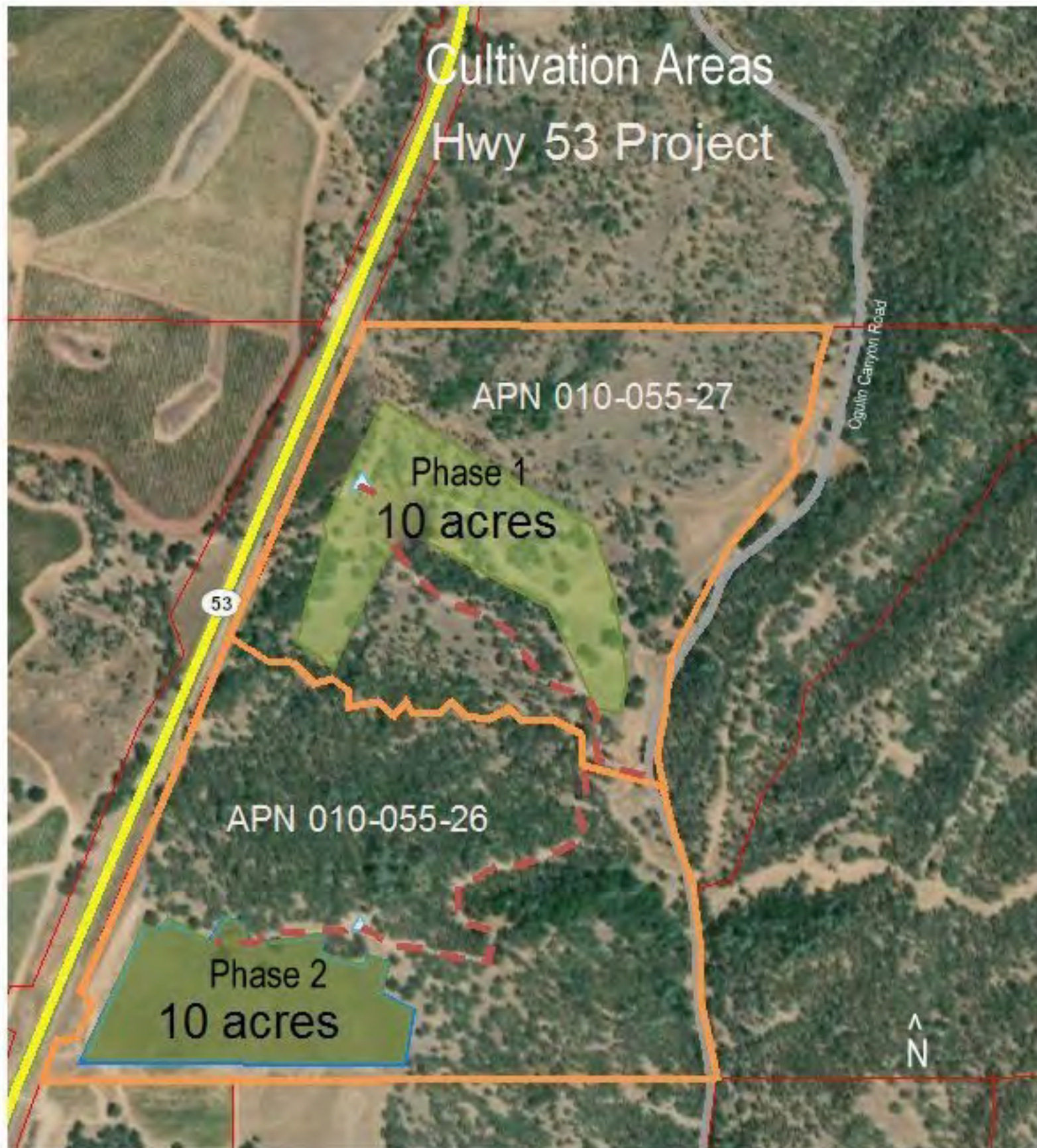
APN 010-055-26

Phase 2
10 acres

Coguin Canyon Road

53

^
N



PROPERTY DIAGRAM

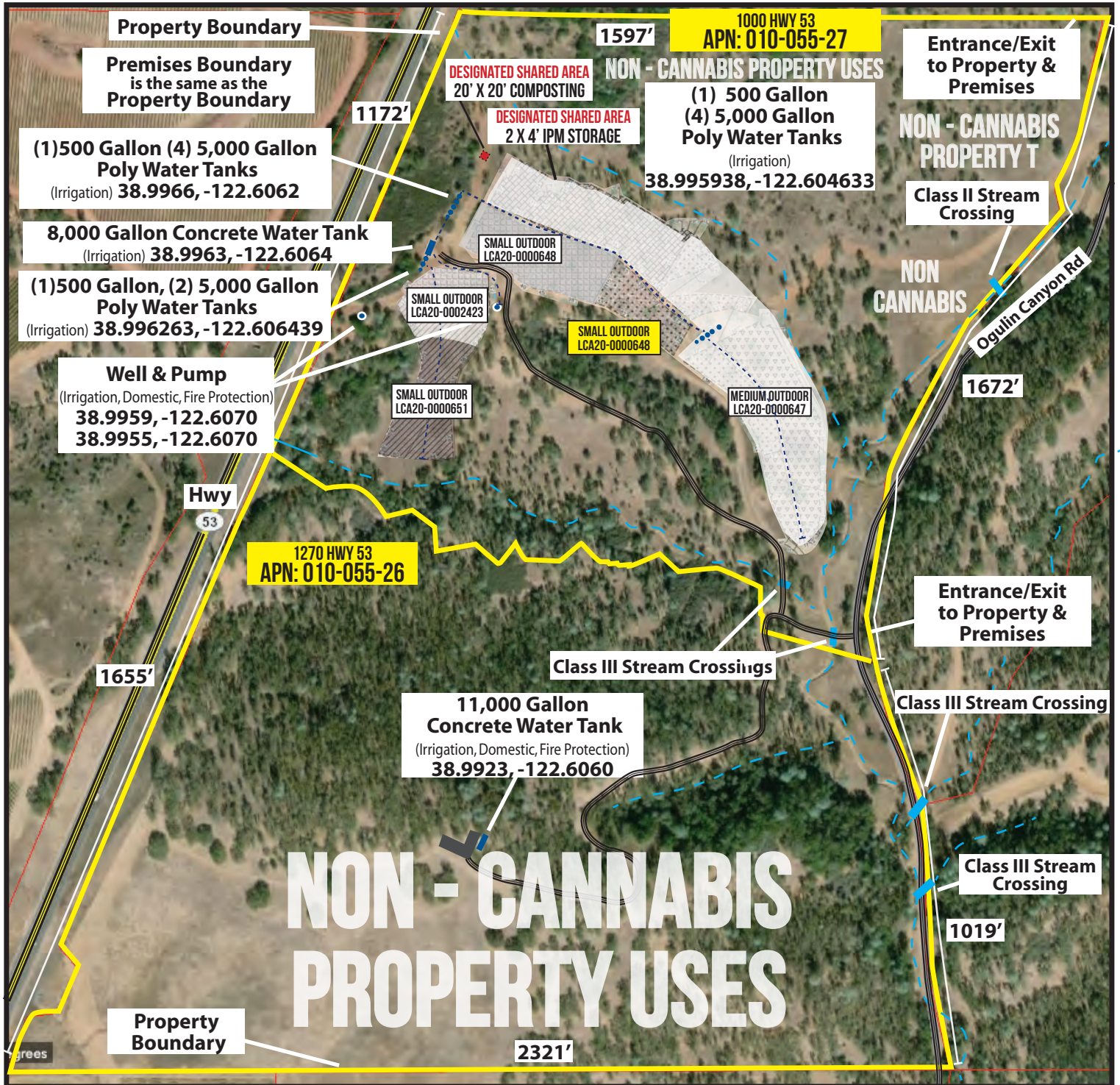
SMALL OUTDOOR

LCA20-0000648

Lake County Investment Group LLC
Laythen Martines
1000 and 1270 State Highway 53
Clearlake, CA 95422
APNs: 010-055-26, 010-055-27



0 175' 350'
1 inch = 350'



- Well/Pump
- Water Tanks
- Water Distribution
- - - Stream
- Stream Crossing
- Boundary Line
- Road

SITE PLAN

LAKE COUNTY

Property Owner & Applicant:

Lake County Investment Group LLC

Laythen Martines

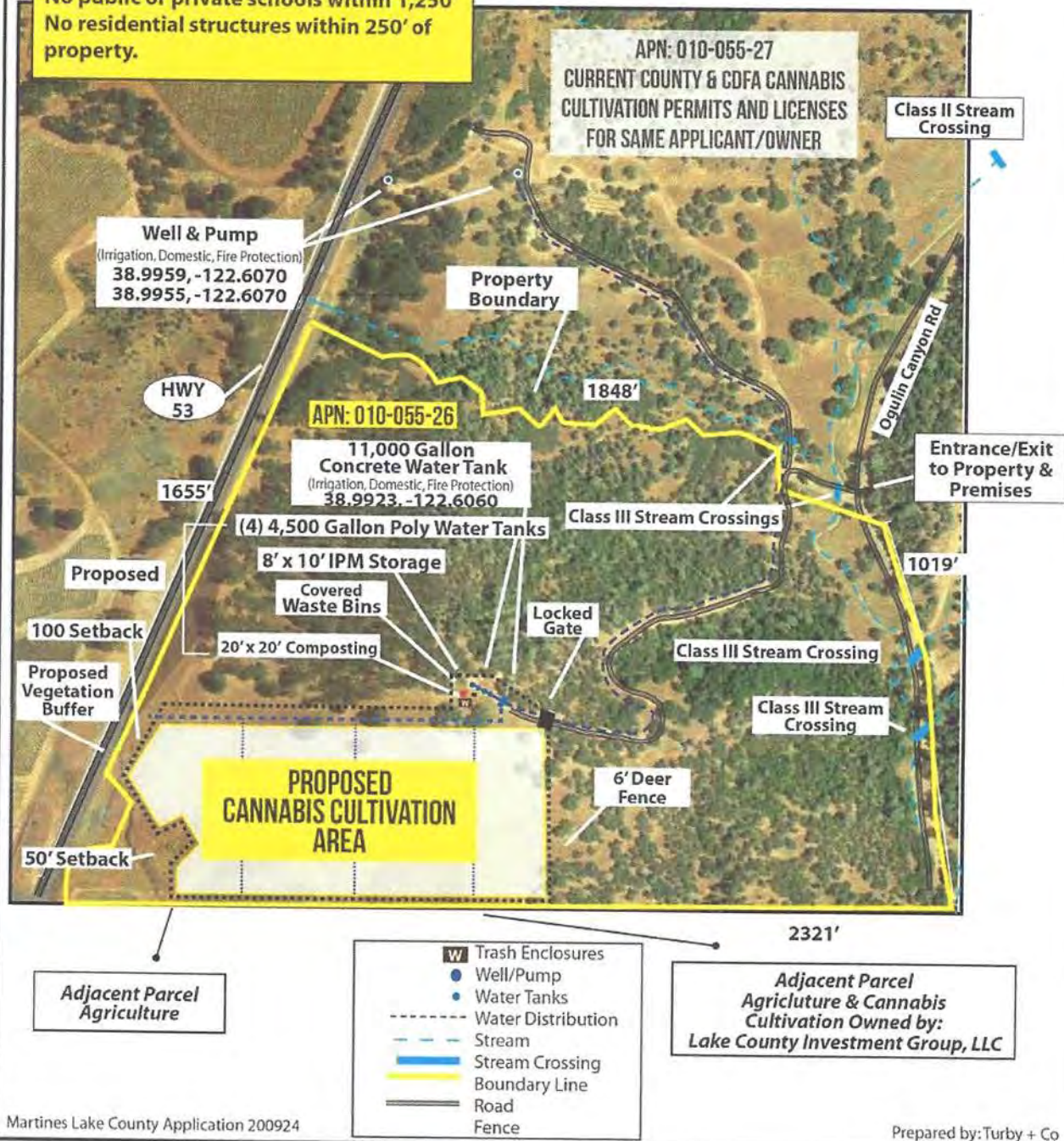
413 Teakwood Drive Redding, CA 96003

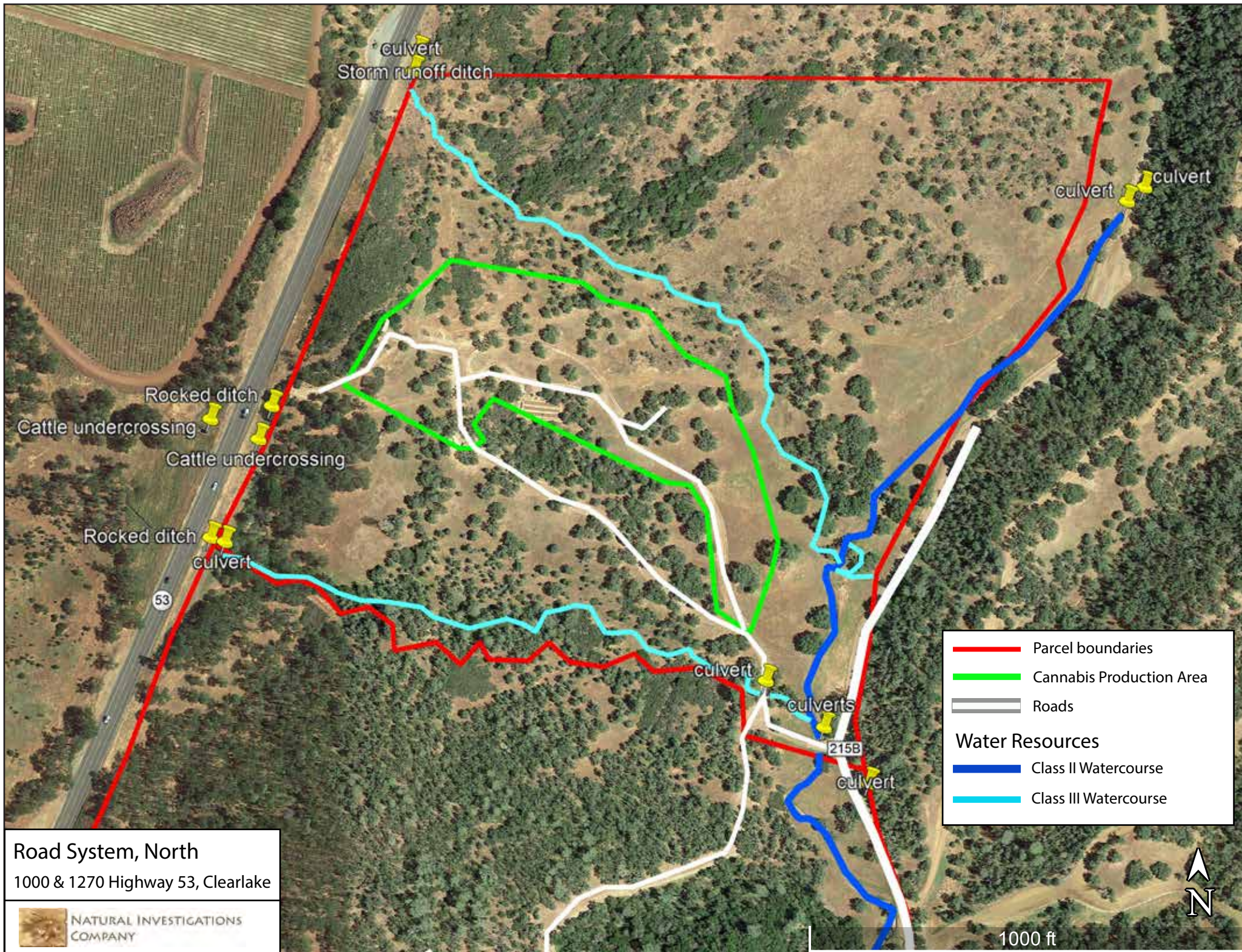
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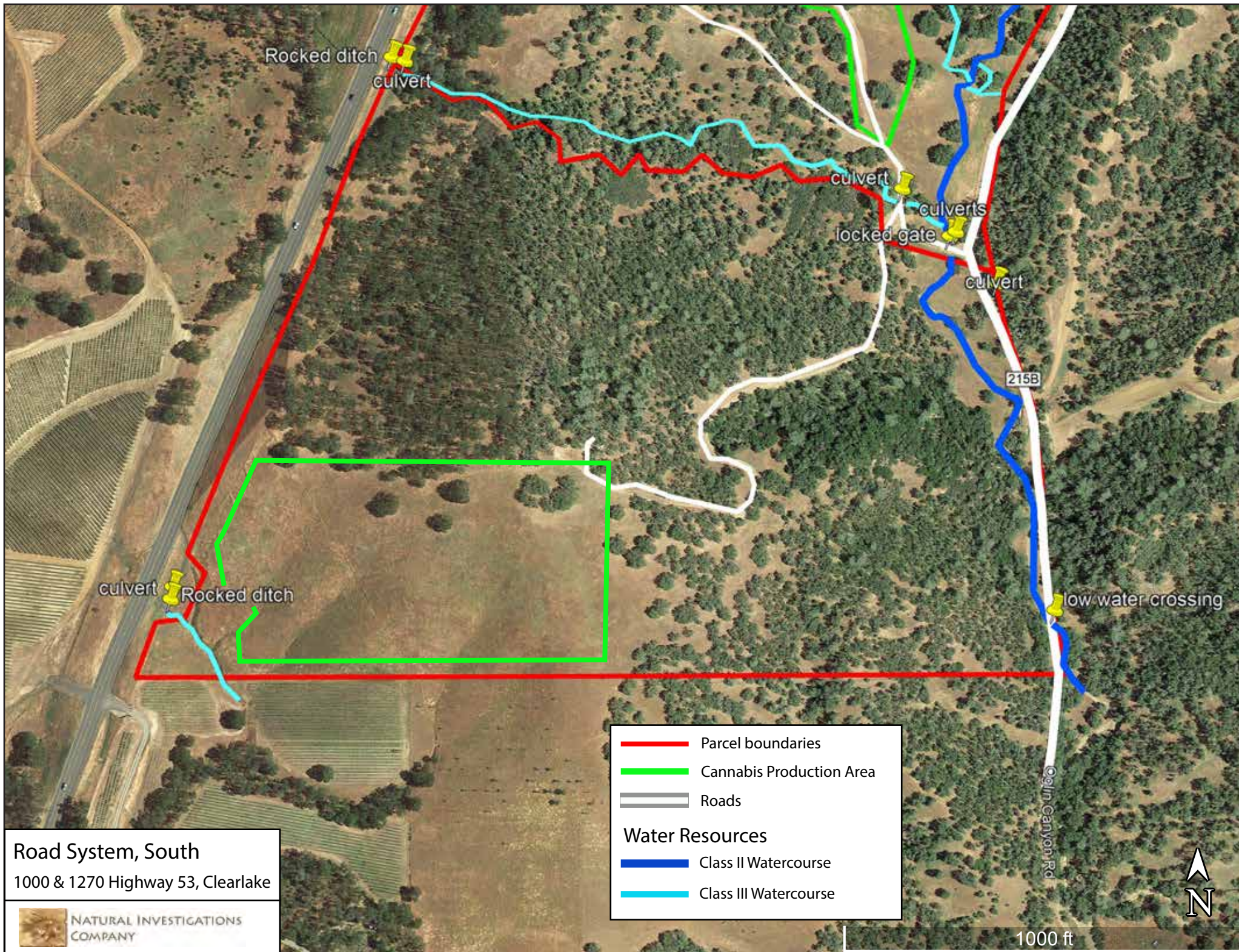
1000 State Highway 53

Clearlake, CA 95422

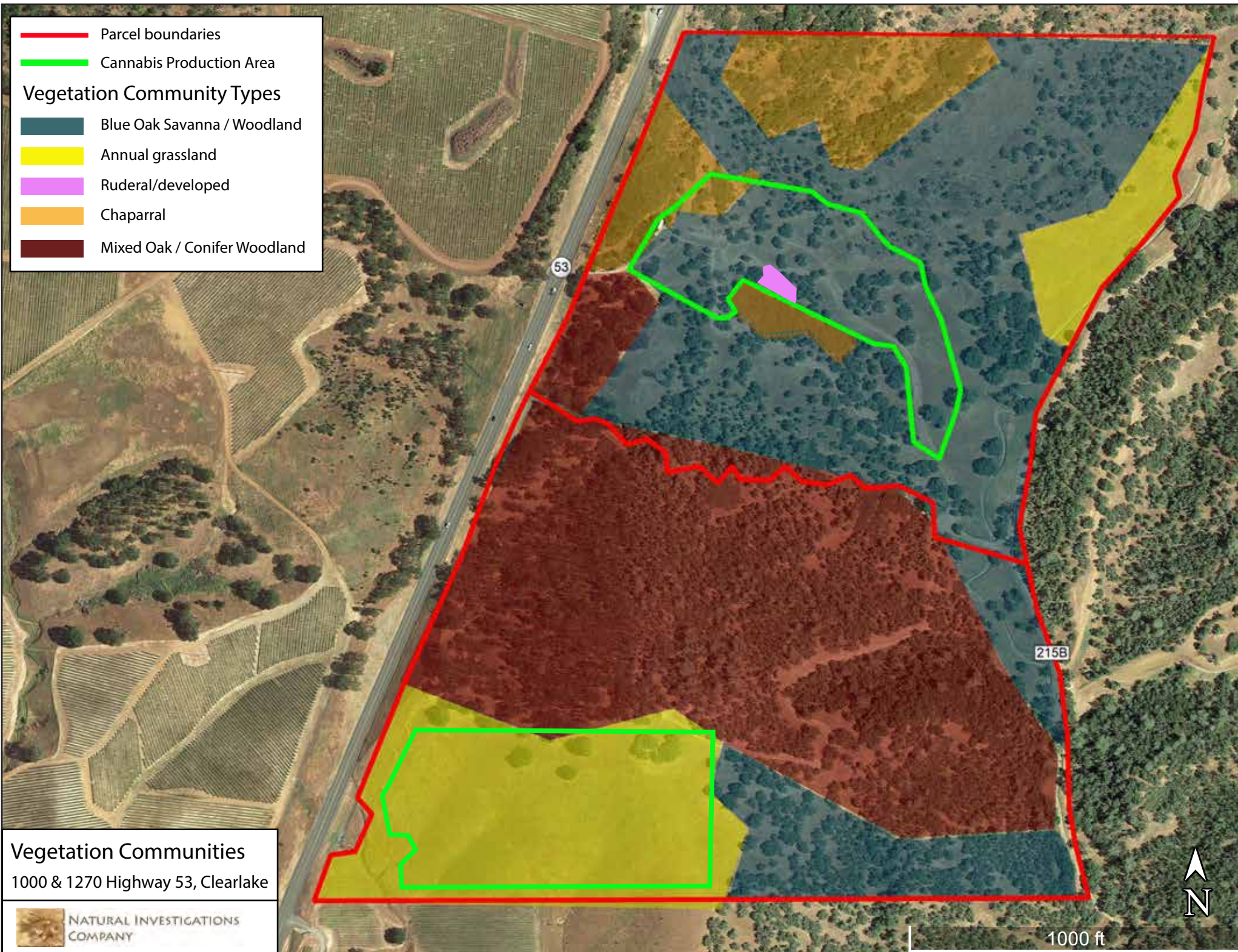
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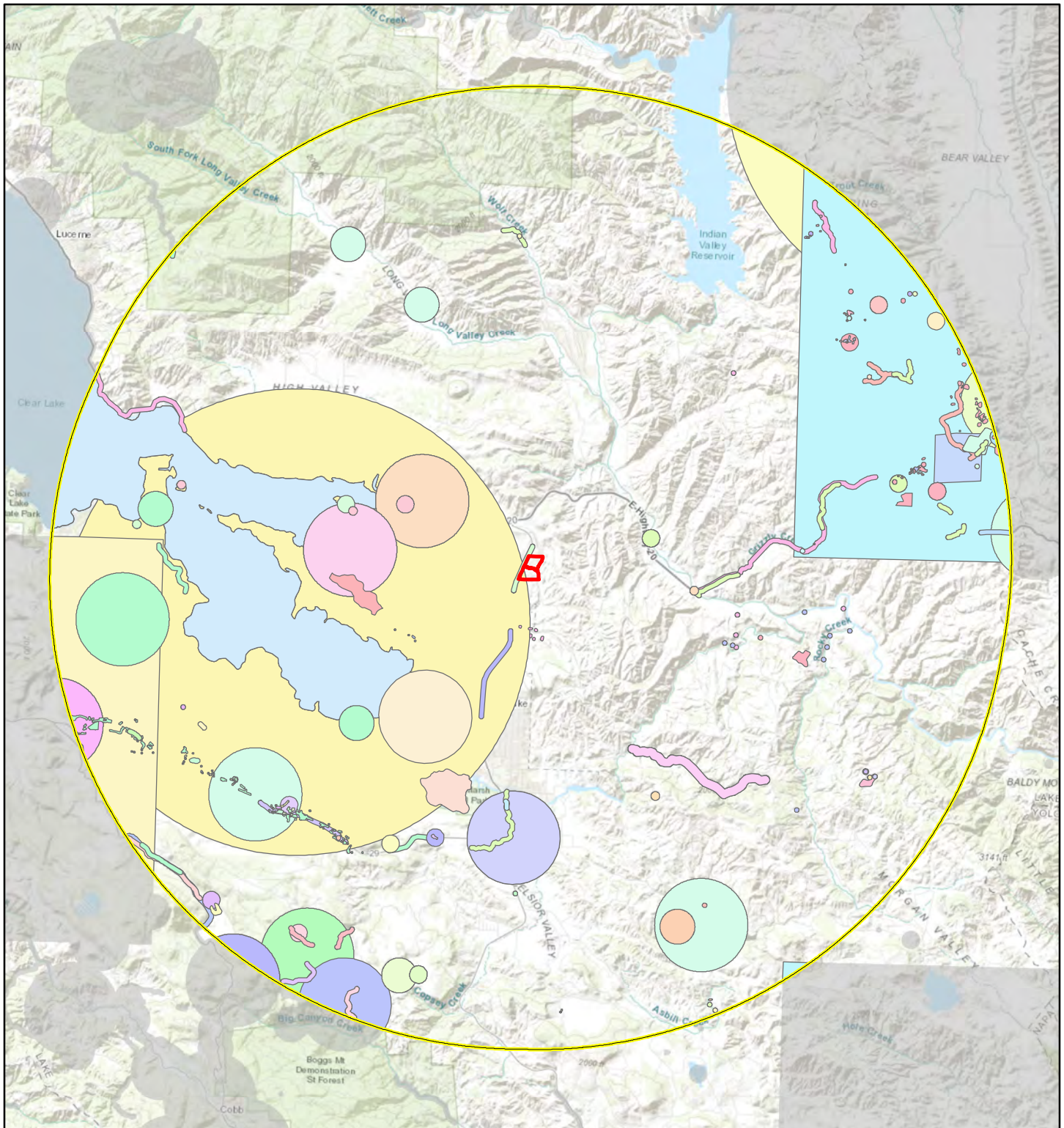
- Parcel boundaries
- Cannabis Production Area
- Vegetation Community Types**
 - Blue Oak Savanna / Woodland
 - Annual grassland
 - Ruderal/developed
 - Chaparral
 - Mixed Oak / Conifer Woodland



Vegetation Communities
1000 & 1270 Highway 53, Clearlake



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Project Location 10 Mile Buffer

1:190,000 1 inch = 3 miles
 0 3 6
 Miles



Notes:

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. Natural Investigations Company can not guarantee the accuracy and content of electronic files. The master file is stored by Natural Investigations Company and will serve as the official record of this communication.
3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission. Data Sources: California Department of Fish and Wildlife. 2019. RareFind 5.x, California Natural Diversity Data Base. Biogeographic Data Branch, Sacramento, California. (updated monthly by subscription service)

Special-Status Species Occurrences Map

1000 & 1270 Highway 53

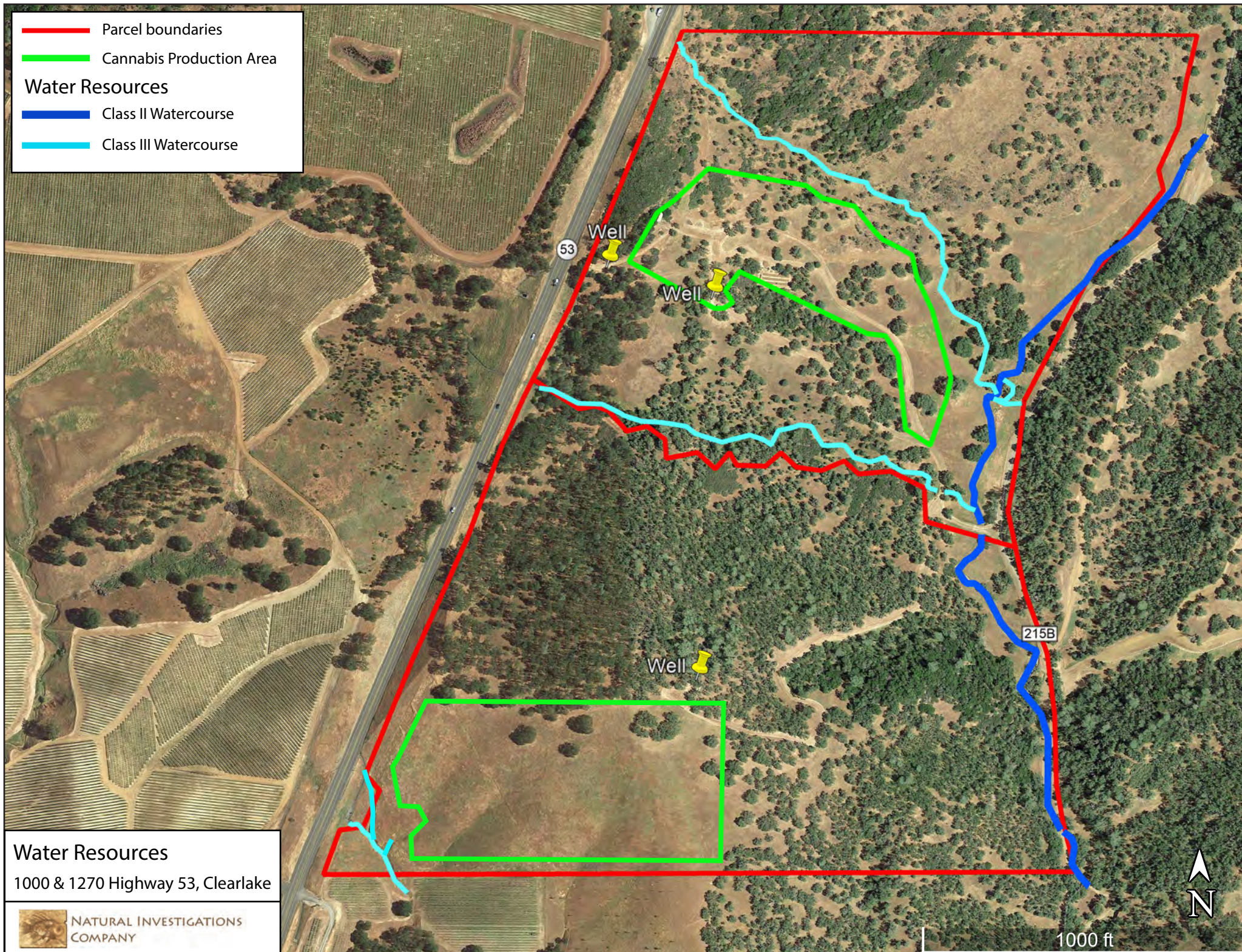
Lower Lake 1993 Quadrangle: Township 13N, Range 7W, Section 11



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- Parcel boundaries
 - Cannabis Production Area
- Water Resources**
- Class II Watercourse
 - Class III Watercourse

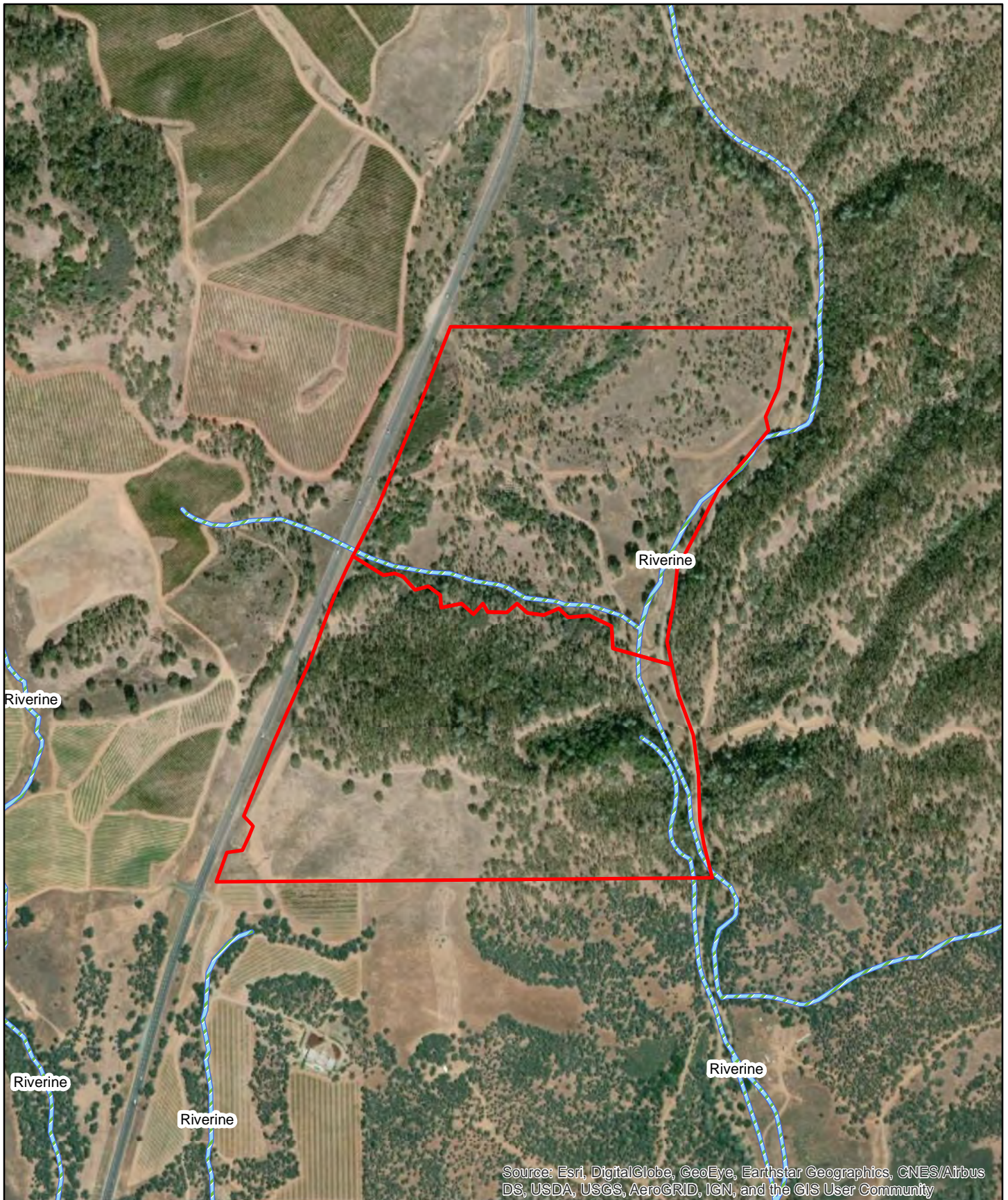


Water Resources

1000 & 1270 Highway 53, Clearlake



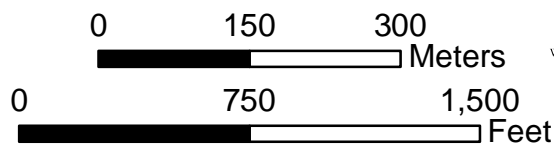
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Parcel Location



Wetlands and Channels

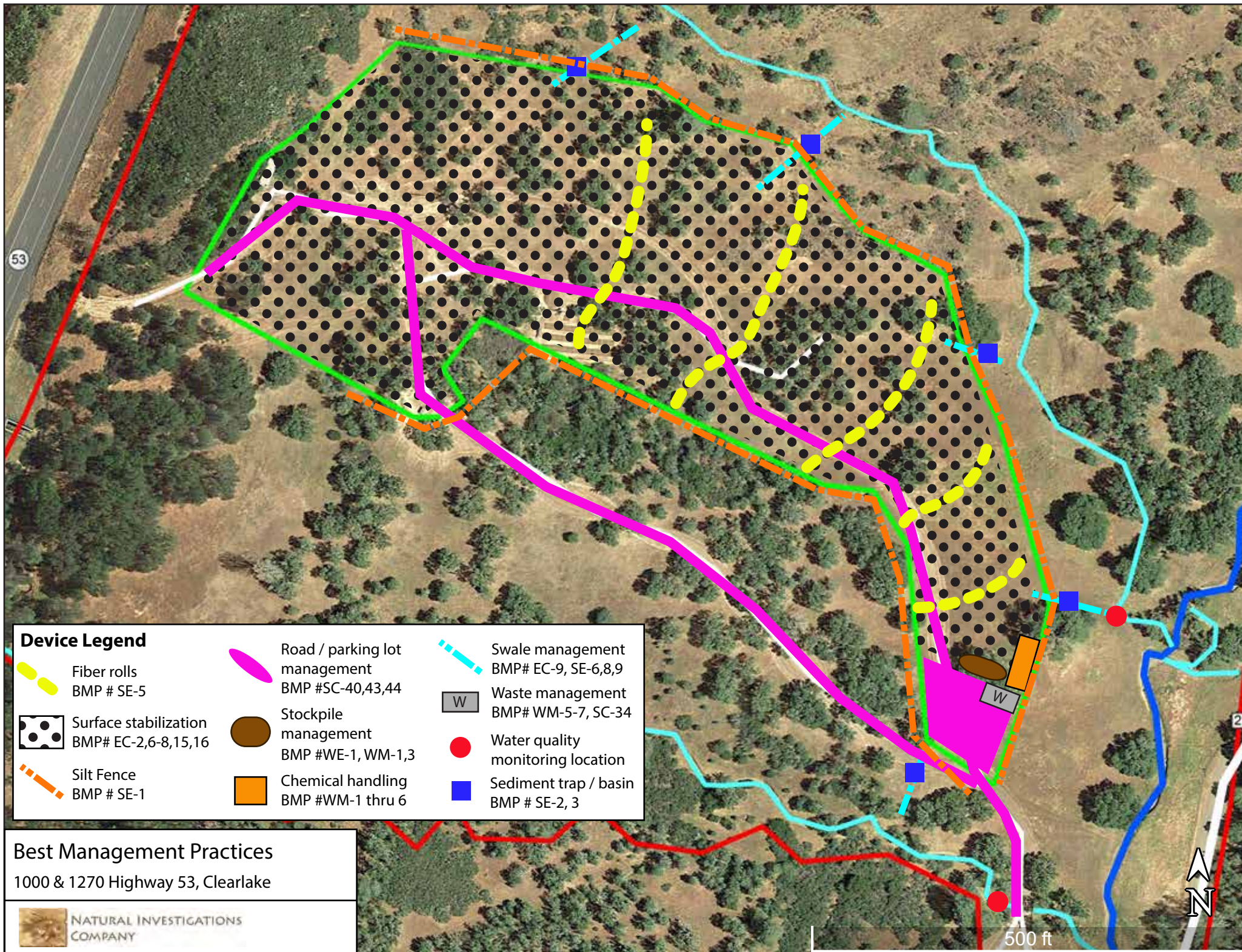


1:7,500

1000 & 1270 Highway 53
National Wetlands Inventory
Features Map



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Best Management Practices 1000 & 1270 Highway 53, Clearlake



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Device Legend



Fiber rolls
BMP # SE-5



Surface stabilization
BMP# EC-2,6-8,15,16



Silt Fence
BMP # SE-1



Road / parking lot
management
BMP #SC-40,43,44



Stockpile
management
BMP #WE-1, WM-1,3



Chemical handling
BMP #WM-1 thru 6



Swale management
BMP# EC-9, SE-6,8,9



Waste management
BMP# WM-5-7, SC-34



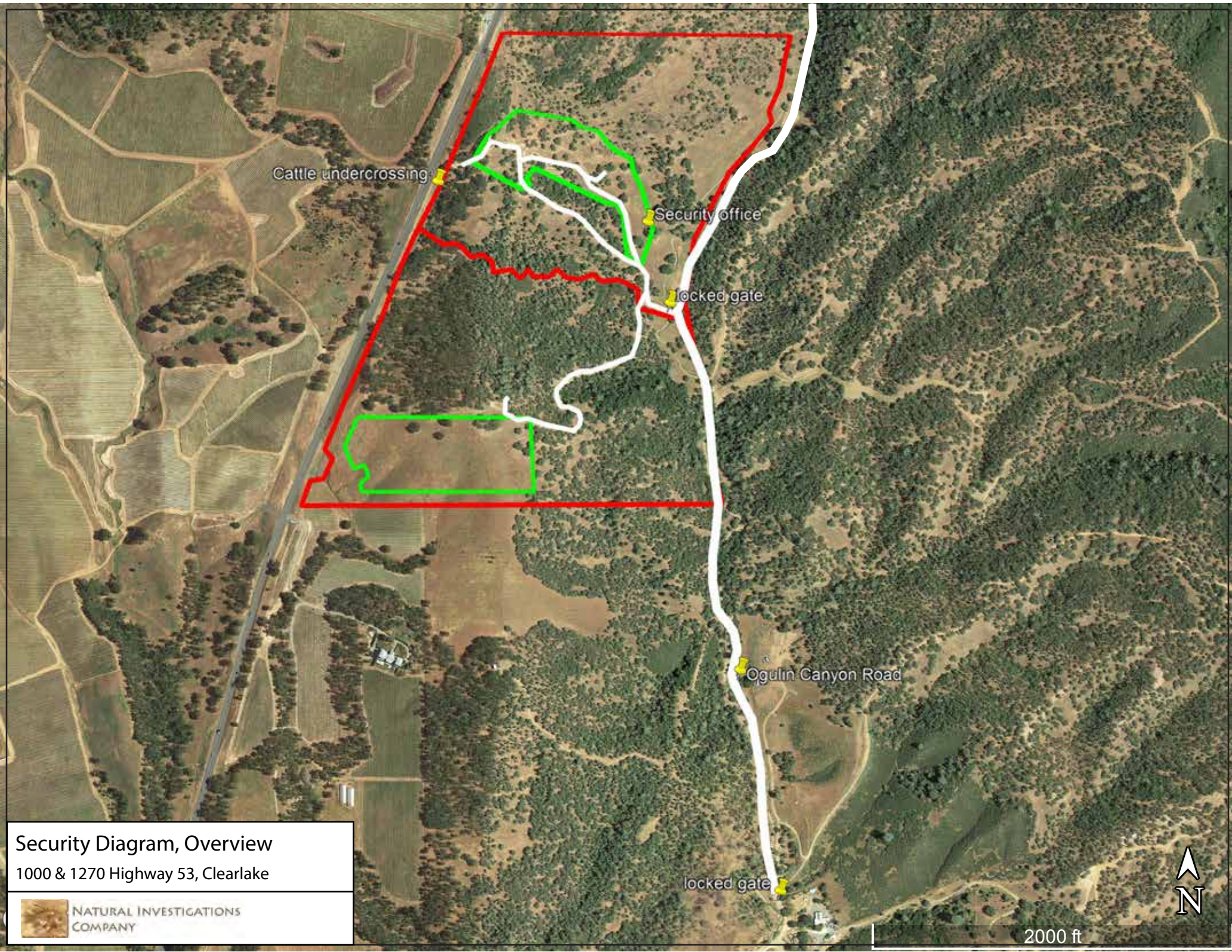
Water quality
monitoring location



Sediment trap / basin
BMP # SE-2, 3



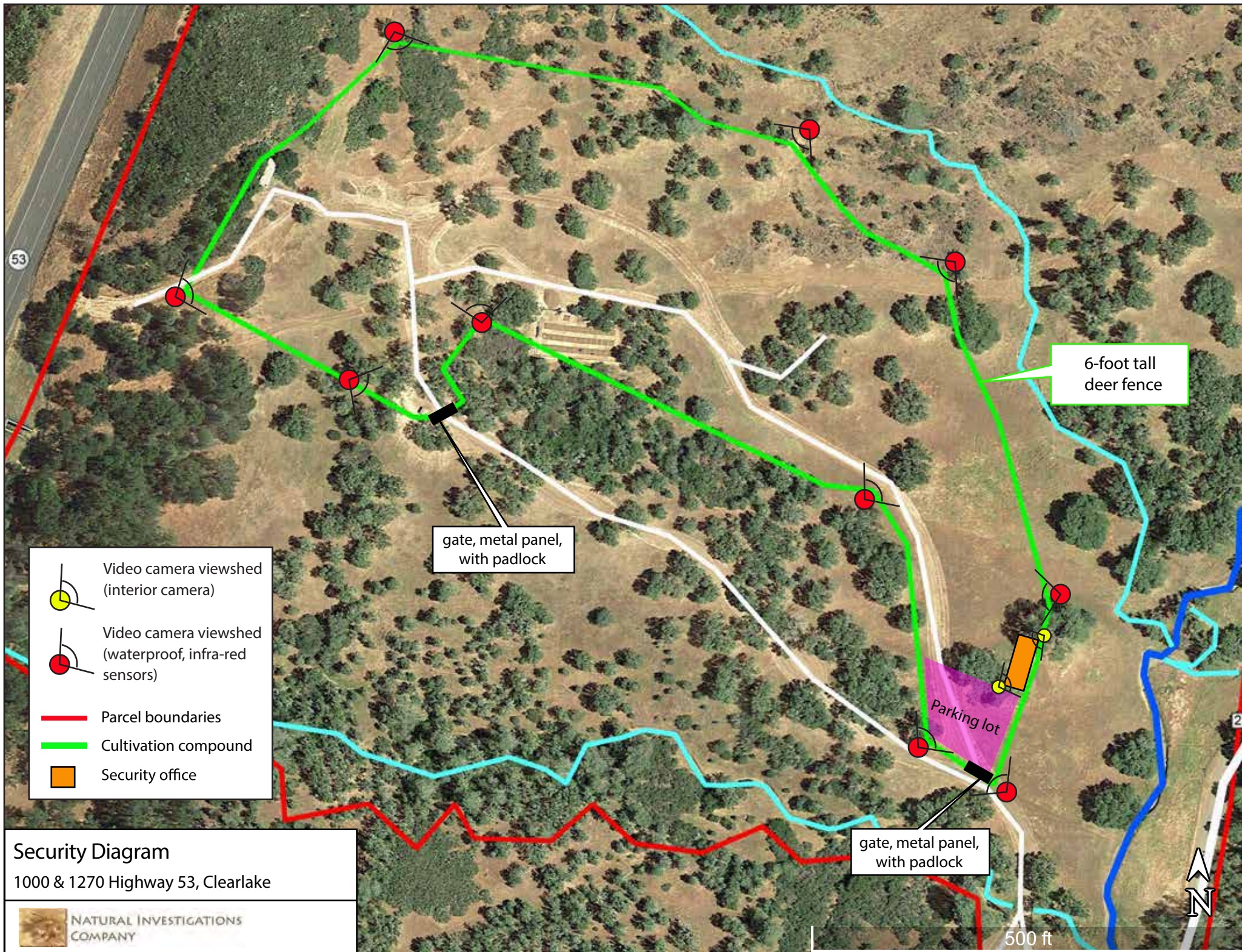
500 ft



Security Diagram, Overview
1000 & 1270 Highway 53, Clearlake



NATURAL INVESTIGATIONS
COMPANY



19.0 APPENDIX: CASQA INDUSTRIAL AND COMMERCIAL HANDBOOK BMP FACT SHEETS

20.0 APPENDIX: PEST MANAGEMENT GUIDELINES



LEGAL PEST MANAGEMENT PRACTICES FOR MARIJUANA GROWERS IN CALIFORNIA

Department of Pesticide
Regulation

PESTS OF MARIJUANA IN CALIFORNIA

Marijuana pests vary according to cultivar (variety), whether the plants are grown indoors or outdoors, and where the plants are grown geographically. The pests included in this review are preliminary and based on the following sources: a presentation given in 2013 by Whitney Cranshaw, an extension entomologist at Colorado State University, and a review article by John M. McPartland, a professor of family medicine at the University of Vermont. We also received input from Kevin Hoffman, Primary State Entomologist, California Department of Food & Agriculture (CDFA).

HOW TO INTERPRET THE TABLES

Table 1 lists active ingredients not illegal to use on marijuana and the pests that these active ingredients target.

These active ingredients are exempt from **residue tolerance requirements**¹ and either exempt from **registration requirements**² or registered for a use that's broad enough to include use on marijuana. Residue tolerance requirements are set by U.S. EPA for each pesticide on each food crop and is the amount of pesticide residue allowed to remain in or on each treated crop with "reasonable certainty of no harm." Some pesticides are exempted from the tolerance requirement when they're found to be safe. Some of these pesticides are bacterial-based insect pathogens (e.g., *Bacillus thuringiensis*) or biofungicides (e.g., *Bacillus subtilis*, *Glilotadium virens*).

Active ingredients exempt from registration requirements are mostly food-grade essential oils such as peppermint oil or rosemary oil.

Tables 2 and 3 list pests of marijuana grown outdoors and indoors, and **Table 3** shows pests arranged by the portion of the plant they attack. An explanation of the column labels for Tables 2 and 3 follow.

PESTS. The tables show the most likely pests in California based on Cranshaw's presentation and McPartland's list and gleaned from California-based web sites and blogs. Some pests that drew attention on several blogs (e.g., russet mites) may be worse during drought years. Many have cyclic population

fluctuations and others are mainstays of general greenhouse cultivation (e.g., whiteflies, thrips, and fungus gnats). We'll add weeds to this compendium when we have more information.

DAMAGE. For damage caused by greenhouse pests, we derived information from Cranshaw's presentation; for that of outdoor pests when there wasn't any overlap, McPartland's list was used and information from UC IPM for various crops. Accounts of damage by rodents is anecdotal.

PESTS NOT OFFICIALLY IDENTIFIED IN CALIFORNIA. Kevin Hoffman of CDFA notes that several marijuana pests in other states are not yet known in California. These pests would add to the russet mites, aphids, cutworms, budworms, borers, and flea beetles already in California. As more and more marijuana is planted throughout the state, collecting potential pests will enable entomologists to identify new species.

THE IMPORTANCE OF CORRECT IDENTIFICATION. It's essential to identify the potential pest, or you may launch a futile program for a mite or insect that isn't a pest. And likewise, you need to know the correct species or you may use the wrong management strategy. For accurate identification, take specimens to an entomologist.

HOW TO PRESERVE SPECIMENS FOR IDENTIFICATION. If the mite or insect specimen is hard bodied (e.g., beetles, moths) carefully place it in a small pill vial and cushion with crumpled tissue paper. If your specimen isn't yet dead, put it in a jar and place in a freezer overnight. Do not wrap specimens in tissue and seal them in plastic bags or you'll end up with smashed bug parts.

Place soft-bodied specimens (e.g., mites, leafhoppers, aphids, caterpillars) in a jar filled with rubbing alcohol. Include written information such as where on the plant you found the specimen, the general location of the plant, and date captured. Note original color and texture, since these will change once you immerse the specimen in alcohol. Also helpful are photographs of the specimen in its original habitat.

IPM PRACTICES. Most of these are standard practices for pests on hosts other than marijuana. For more detailed explanations, see information compiled by the

¹ 40 CFR (Code of Federal Regulations)

² under FIFRA section 25(b) and 3 CCR section 6147

University of California Statewide IPM Program (UC IPM) at www.ipm.ucdavis.edu. You can enter a pest name in the search box (e.g., cutworm) and read about IPM practices for the pest on crops other than marijuana. For marijuana grown indoors, go to the UC IPM [home page](#), click on [Agricultural Pests](#) and scroll down the alphabetical list until you reach [ornamental nurseries](#).

Some practices were excluded because they apply to nearly all of the pests. For example, when targeting aphids, whiteflies, and thrips, growers can attract predaceous and parasitic arthropods by planting strips or borders of cover crops (e.g., California buckwheat) and insectary plants—especially those in the carrot, mustard, and sunflower families (Pickett & Bugg, 1998).

LEGAL PESTICIDES. These are covered above in the Table 1 description and are exempt from **residue tolerance requirements** and either exempt from

registration requirements or registered for a use that is broad enough to include use on marijuana.

Table 4 shows representative marijuana pests by plant part. Not all of these pests are important, but their collective damage may affect the overall health of the plant.

REFERENCES

- Cranshaw, Whitney. 2013. Challenges and opportunities for pest management of medical marijuana in Colorado. Presentation.
- McPartland, J.M. 1996. *Cannabis* pests. J. Internatl. Hemp Assoc. 3(2): 49, 52–55.
- Pickett, C.H. & R.L. Bugg, eds. 1998. Enhancing Biological Control: Habitat management to promote natural enemies of agricultural pests. UC Press, Oakland, Calif.

Table 1. Active ingredients that are exempt from residue tolerance requirements^a and either exempt from registration requirements^b or registered for a use broad enough to include use on marijuana.

ACTIVE INGREDIENT	PEST OR DISEASE
azadirachtin ^a	aphids, whiteflies, fungus gnats, leafminers, cutworms
<i>Bacillus subtilis</i> QST ^{a1}	root diseases, powdery mildew
<i>Bacillus thuringiensis</i> ^{a2} subsp. <i>aizawai</i> or <i>kurstaki</i>	moth larvae (e.g., cutworms, budworms, borer)
<i>Bacillus thuringiensis</i> ^{a2} subsp. <i>israelensis</i>	fly larvae (e.g., fungus gnats)
<i>Beauveria bassiana</i> ^{a3}	whiteflies, aphids, thrips
cinnamon oil ^b	whiteflies
<i>Gliocladium virens</i> ^{a1}	root diseases
horticultural oils ^a (petroleum oil)	mites, aphids, whiteflies, thrips; powdery mildew
insecticidal soaps ^a (potassium salts of fatty acids)	aphids, whiteflies, cutworms, budworms
iron phosphate ^a , sodium ferric EDTA ^a	slugs and snails
neem oil ^a	mites; powdery mildew
potassium bicarbonate ^a ; sodium bicarbonate ^a	powdery mildew
predatory nematodes ^a	fungus gnats
rosemary + peppermint essential oils ^b	whiteflies
sulfur ^a	mites, flea beetles
<i>Trichoderma harzianum</i> ^{a1}	root diseases

^a 40 CFR (Code of Federal Regulations)

^b FIFRA §25(b) and 3 CCR §6147 [FIFRA = the Federal Insecticide, Fungicide, and Rodenticide Act; CCR = California Code of Regulations]

¹ Biofungicides

² Bacterial-based insect pathogen

³ Fungal-based insect pathogen

Table 2. PEST MANAGEMENT PRACTICES FOR MARIJUANA GROWN OUTDOORS

PEST		DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
MITES & INSECTS				
two-spotted spider mites <i>Tetranychus urticae</i> (and other Tetranychidae)		Suck plant sap; stipple leaves	<ul style="list-style-type: none"> Keep dust down by hosing off plants (if dust is a problem) Release predatory mites 	neem oil, horticultural oil
russet mites <i>Aculops</i> spp.		Suck plant sap; kill leaves and flowers	<ul style="list-style-type: none"> Release predatory mites 	neem oil, horticultural oil, sulfur
crickets (field & house)		Eat seedlings	<ul style="list-style-type: none"> Use floating row covers or cones on individual plants 	—
termites		Eat roots	<ul style="list-style-type: none"> Flood nests 	—
leafhoppers		Suck plant sap; weaken plants	<ul style="list-style-type: none"> Encourage natural enemies by planting nectar sources 	horticultural oil or insecticidal soaps for nymphs
aphids <i>Myzus persicae</i> , <i>Aphis fabae</i>		Suck plant sap; weaken plants	<ul style="list-style-type: none"> Hang up yellow sticky cards (alates) Hose off plants 	azadirachtin, horticultural oil, insecticidal soaps, <i>Beauveria bassiana</i>
whiteflies <i>Trialeurodes vaporariorum</i> , <i>Bemisia tabaci</i> , <i>B. argentifolii</i>		Suck plant sap; weaken plants	<ul style="list-style-type: none"> Hang up yellow sticky cards Use reflective plastic mulch 	azadirachtin, horticultural oil, insecticidal soaps, rosemary + peppermint oils, <i>Beauveria bassiana</i>
leafminers <i>Liriomyza</i> spp.		Bore into roots and leaves	<ul style="list-style-type: none"> Remove older infested leaves Use biocontrol: release <i>Diglyphus</i> parasitoids 	azadirachtin
LEPIDOPTERA	cutworms <i>Agrotis ipsilon</i> , <i>Spodoptera exigua</i> (Noctuidae)	Eat seedlings	<ul style="list-style-type: none"> Use pheromone traps to detect adults. Remove weeds, which serve as a reservoir for cutworms and other noctuids 	Vegetative stage only: Use <i>Bacillus thuringiensis kurstaki</i> if egg-laying adults found, insecticidal soap; azadirachtin
	budworms <i>Helicoverpa zea</i> (Noctuidae)	Eat flowering buds	<ul style="list-style-type: none"> Shake plants to dislodge larvae Remove infested buds Plant corn as trap crop 	Vegetative stage only: Use <i>Bacillus thuringiensis kurstaki</i> , insecticidal soap

PEST		DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
COLEOPTERA	flea beetles (Chrysomelidae)	Bore into stems (grubs); feed on seedlings and leaves of larger plants (adults)	<ul style="list-style-type: none"> Use reflective mulches Plant trap crops (e.g., radish or Chinese mustard) 	sulfur
	scarab grubs (possibly other beetles)	Bore into stems	<ul style="list-style-type: none"> Use parasitic nematodes 	—
MAMMALS				
mice (e.g., house mice)		Eat young sprouts and seeds	<ul style="list-style-type: none"> Double wrap a 3'-tall chicken wire fence around plants 	rodenticides*
roof rats , <i>Rattus rattus</i> wood rats , <i>Neotoma</i> spp.		Strip bark from stems to build nests	<ul style="list-style-type: none"> Trap (minus rodenticides) Mount barn owl boxes 	
pocket gophers , <i>Thomomys</i> spp.		Tunnel through planting areas; feed on plants; gnaw on irrigation lines	<ul style="list-style-type: none"> Install underground fencing (hardware cloth or ¾" mesh poultry wire) Mount barn owl boxes 	
Columbian black-tailed deer , <i>Odocoileus hemionus columbianus</i>		Knock over plants; leave dander, droppings, and ticks behind	<ul style="list-style-type: none"> Install deer fencing 	—
black bears , <i>Ursus americana</i>		Knock over plants	<ul style="list-style-type: none"> Install electric fencing 	—

* If using a rodenticide, use products that are not DPR-restricted materials or federally restricted-use pesticides *and* are registered for a broad enough use to include use in or around marijuana cultivation sites. If using a rodenticide always read and follow the label and check to make sure that the target rodent is listed. Second-generation anticoagulant products (contain the active ingredients brodifacoum, bromadiolone, difenacoum, and difethialone) are DPR-restricted materials not labeled for field use and should never be used in or around marijuana cultivation sites.

Table 3. PEST MANAGEMENT PRACTICES FOR MARIJUANA GROWN INDOORS
(e.g., greenhouses, sheds, and grow rooms)

PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
DISEASES			
powdery mildew <i>Sphaerotheca macularis</i>	Grow on leaves as white and gray powdery patches	<ul style="list-style-type: none"> Use fans to improve air circulation 	horticultural oil; neem oil; sodium bicarbonate, potassium bicarbonate; <i>Bacillus subtilis</i>
pythium root rots <i>Pythium</i> spp.	Attack root tips and worsens when plants grow in wet soil	<ul style="list-style-type: none"> Avoid hydroponic production or wet soil conditions 	Incorporate biocontrol agents into root-growing media (e.g., <i>Gliocladium virens</i> , <i>Trichoderma harzianum</i> , <i>Bacillus subtilis</i>)
MITES & INSECTS			
two-spotted spider mite <i>Tetranychus urticae</i> (and other Tetranychidae)	Suck plant sap; stipple leaves	<ul style="list-style-type: none"> Disinfest cuttings before introducing to growing area Release predatory mites 	neem oil, horticultural oil, sulfur
leafhoppers	Suck plant sap; weaken plants	<ul style="list-style-type: none"> Encourage natural enemies by planting nectar sources 	horticultural oil or insecticidal soaps for nymphs
whiteflies <i>Trialeurodes vaporariorum</i> , <i>Bemisia tabaci</i> , <i>B. argentifolii</i>	Suck plant sap; weaken plants	<ul style="list-style-type: none"> Hang up yellow sticky cards Use biocontrol: <i>Encarsia formosa</i> 	azadirachtin, <i>Beauveria bassiana</i> , cinnamon oil, horticultural oil
thrips <i>Heliothrips haemorrhoidalis</i> , <i>Frankliniella occidentalis</i> , <i>Thrips tabaci</i>	Stipple leaves and vector viruses	<ul style="list-style-type: none"> Hang up yellow or blue sticky cards 	
dark-winged fungus gnats (Diptera: Sciaridae) <i>Bradysia</i> spp.	Damage roots and stunt plant growth	<ul style="list-style-type: none"> Avoid overwatering Use growing media that deters gnat development Hang up yellow sticky cards Use biocontrol: soil-dwelling predatory mites 	<i>Bacillus thuringiensis israelensis</i> (BTI); predatory nematodes; azadirachtin soil drenches

Table 4. PESTS OF MARIJUANA BY PLANT PART

Seedlings	Flower & Leaf (grown outdoors)	Flower & Leaf (grown indoors)	Stalk & Stem	Root
crickets	flea beetles	spider mites	rats	flea beetles
cutworms	leafminers	leafhoppers		white root grubs
flea beetles	budworms	aphids		root maggots
slugs		whiteflies		termites & ants
rodents		thrips		fungus gnats
birds				wireworms

CANNABIS

PESTICIDES THAT ARE **LEGAL** TO USE



Protecting workers, the public, and the environment from adverse effects of pesticide use in cannabis cultivation is critical to the mission of the California Department of Pesticide Regulation (DPR). DPR and the County Agricultural Commissioners (CAC) enforce the use and sale of pesticides under Divisions 6 and 7 of the California Food and Agricultural Code (FAC), and Title 3 of the California Code of Regulations (CCR). These laws and regulations apply to all pesticide use; cannabis is no exception.

All pesticide product labels include a warning statement, precautionary statements for protecting human and environmental health, storage and disposal statements, and directions for use. By law, all pesticide users must follow these statements.

When using pesticide products in cannabis cultivation, applicators must not use a rate that is higher than the rates listed on the label and follow the agricultural use requirements including method of application, restricted entry interval, personal protective equipment, and pre-harvest interval.

Some pesticide products are never allowed in cannabis cultivation under any circumstances (see DPR's document: [Pesticides that Cannot be Used on Cannabis](#)).

Always read the label prior to using any pesticide.

PRODUCTS THAT CAN BE LEGALLY APPLIED TO CANNABIS IN CALIFORNIA

A pesticide product can legally be applied to cannabis under state law if the active ingredients found in the product are exempt from residue tolerance requirements and the product is either exempt from registration requirements or registered for a use that is broad enough to include use on cannabis.

Residue tolerance requirements are set by U.S. EPA for each pesticide on each food crop and are the amount of pesticide residue allowed to remain in or on each treated crop with "reasonable certainty of no harm." Some pesticides are exempt from the tolerance requirement when they are found to be minimal risk.

Active ingredients exempt from registration requirements are mostly food-grade essential oils such as peppermint oil or rosemary oil.

Cannabis cultivators who are licensed by the California Department of Food and Agriculture are required to comply with pesticide laws and regulations as enforced by DPR and the CAC's.

For more information:
www.cdpr.ca.gov/cannabis

PESTICIDES THAT ARE **LEGAL** TO USE ON CANNABIS

The following are examples of pesticide active ingredients that are exempt from tolerance requirements and either exempt from registration requirements or have labels broad enough to include use on cannabis. This is not an exhaustive list of active ingredients that may fit the legal use criteria. The active ingredients are organized by the intended target.

Insecticides and Miticides

- Azadirachtin
- *Bacillus thuringiensis* sub. *kurstaki*
- *Bacillus thuringiensis* sub. *israelensis*
- *Beauveria bassiana*
- *Burkholderia* spp. strain A396
- Capsaicin
- Cinnamon and cinnamon oil
- Citric acid
- Garlic and garlic oil
- Geraniol
- Horticultural oils (petroleum oil)
- Insecticidal soaps (potassium salts of fatty acids)
- Iron phosphate
- *Isaria fumosorosea*
- Neem oil
- Potassium bicarbonate
- Potassium sorbate
- Rosemary oil
- Sesame and sesame oil
- Sodium bicarbonate
- Soybean oil
- Sulfur
- Thyme oil

Fungicides and Antimicrobials

- *Bacillus amyloliquefaciens* strain D747
- Cloves and clove oil
- Corn oil
- Cottonseed oil
- *Gliocladium virens*
- Neem oil
- Peppermint and peppermint oil
- Potassium bicarbonate
- Potassium silicate
- Rosemary and rosemary oil
- Sodium bicarbonate
- *Reynoutria sachalinensis* extract
- *Trichoderma harzianum*

Vertebrate Repellants

- Castor oil
- Geraniol

CANNABIS

PESTICIDES THAT **CANNOT** BE USED



Protecting workers, the public, and the environment from adverse effects of pesticide use in cannabis cultivation is critical to the mission of the California Department of Pesticide Regulation (DPR). DPR and the County Agricultural Commissioners (CAC) enforce the use and sale of pesticides under Divisions 6 and 7 of the California Food and Agricultural Code (FAC), and Title 3 of the California Code of Regulations (CCR). These laws and regulations apply to all pesticide use; cannabis is no exception.

All pesticide product labels include a warning statement, precautionary statements for protecting human and environmental health, storage and disposal statements, and directions for use. By law, all pesticide users must follow these statements.

When using pesticide products in cannabis cultivation, applicators must not use a rate that is higher than the rates listed on the label and follow the agricultural use requirements including method of application, restricted entry interval, personal protective equipment, and pre-harvest interval.

Always read the label prior to using any pesticide.

Some pesticides cannot be used in cannabis cultivation.

While there are some pesticide products that are legal to use on cannabis under state law, (see DPR's document: [Pesticides that are Legal to Use on Cannabis](#)) other products are never allowed in cannabis cultivation. The following criteria identify pesticide products that cannot be used in California cannabis cultivation under any circumstances. The use of any pesticides meeting any one of these criteria on cannabis will be strictly enforced as a violation of the FAC and could result in civil or criminal penalties (FAC sections 12996 and 12999.5):

- Not registered for a food use in California
- California Restricted Material including Federal Restricted Use Pesticides (3CCR section 6400)
On the groundwater protection list (3CCR section 6800)

Cannabis cultivators who are licensed by the California Department of Food and Agriculture are required to comply with pesticide laws and regulations as enforced by DPR and the CAC's.

For more information:
www.cdpr.ca.gov/cannabis

PESTICIDES THAT **CANNOT** BE USED ON CANNABIS

The following are criteria for identifying pesticides that cannot be used in cannabis cultivation and examples of active ingredients meeting these criteria. This is a representative list of active ingredients and not intended to be exhaustive. The fact that an active ingredient is not listed does not authorize its use on cannabis in California.

Pesticides Not Registered for Food Use in California

If a pesticide product does not have directions for use on a food crop, it cannot be used in cannabis cultivation. Examples of active ingredients that do not have food uses include:

- Aldicarb
- Carbofuran
- Chlordane
- Chlorfenapyr
- Coumaphos
- Daminozide
- DDVP (Dichlorvos)
- Etofenprox
- Fenoxycarb
- Imazalil
- Methyl parathion
- Mevinphos
- Paclobutrazol
- Propoxur
- Spiroxamine
- Thiacloprid

California Restricted Materials

DPR designates certain pesticides as California restricted materials (3 CCR section 6400). A pesticide can be considered a restricted material for many reasons including designation as a federal Restricted Use Pesticide. Many of these products have product labels that clearly state "Restricted Use Pesticide." Consult your local CAC to determine whether a product is a restricted material. Examples of California restricted materials include:

- Abamectin
- Bifenthrin
- Brodifacoum
- Bromodiolone
- Cyfluthrin
- Difenacoum
- Difethialone
- Fipronil
- Naled

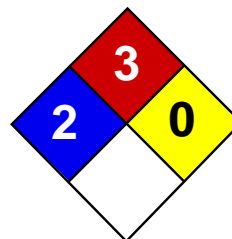
Pesticides on the Groundwater Protection List

Active ingredients that are on the Groundwater Protection List (3CCR section 6800) have chemical characteristics that make them likely to move into groundwater. Examples of active ingredients on the groundwater protection list include:

- Acephate
- Azoxystrobin
- Boscalid
- Carbaryl
- Chlorantraniliprole
- Diazinon
- Dimethoate
- Dimethomorph
- Ethoprop(hos)
- Fludioxonil
- Imidacloprid
- Malathion
- Metalaxyl
- Methiocarb
- Methomyl
- Myclobutanil
- Propiconazole
- Tebuconazole
- Thiamethoxam

21.0 APPENDIX: MATERIAL DATA SAFETY SHEETS

Insert here or bind separately



Health	2
Fire	3
Reactivity	0
Personal Protection	E

Material Safety Data Sheet

Ethyl alcohol 200 Proof MSDS

Section 1: Chemical Product and Company Identification

Product Name: Ethyl alcohol 200 Proof

Catalog Codes: SLE2248, SLE1357

CAS#: 64-17-5

RTECS: KQ6300000

TSCA: TSCA 8(b) inventory: Ethyl alcohol 200 Proof

CI#: Not applicable.

Synonym: Ethanol; Absolute Ethanol; Alcohol; Ethanol 200 proof; Ethyl Alcohol, Anhydrous; Ethanol, undenatured; Dehydrated Alcohol; Alcohol

Chemical Name: Ethyl Alcohol

Chemical Formula: CH₃CH₂OH

Contact Information:

Sciencelab.com, Inc.

14025 Smith Rd.

Houston, Texas 77396

US Sales: **1-800-901-7247**

International Sales: **1-281-441-4400**

Order Online: ScienceLab.com

CHEMTREC (24HR Emergency Telephone), call:

1-800-424-9300

International CHEMTREC, call: 1-703-527-3887

For non-emergency assistance, call: 1-281-441-4400

Section 2: Composition and Information on Ingredients

Composition:

Name	CAS #	% by Weight
Ethyl alcohol 200 Proof	64-17-5	100

Toxicological Data on Ingredients: Ethyl alcohol 200 Proof: ORAL (LD₅₀): Acute: 7060 mg/kg [Rat]. 3450 mg/kg [Mouse]. VAPOR (LC₅₀): Acute: 20000 ppm 8 hours [Rat]. 39000 mg/m 4 hours [Mouse].

Section 3: Hazards Identification

Potential Acute Health Effects:

Hazardous in case of skin contact (irritant), of eye contact (irritant), of inhalation. Slightly hazardous in case of skin contact (permeator), of ingestion.

Potential Chronic Health Effects:

Slightly hazardous in case of skin contact (sensitizer). CARCINOGENIC EFFECTS: A4 (Not classifiable for human or animal.) by ACGIH. MUTAGENIC EFFECTS: Mutagenic for mammalian somatic cells. Mutagenic for bacteria and/or yeast. TERATOGENIC EFFECTS: Classified PROVEN for human. DEVELOPMENTAL TOXICITY: Classified Development toxin [PROVEN]. Classified Reproductive system/toxin/female, Reproductive system/toxin/male [POSSIBLE]. The substance is toxic to blood, the reproductive system, liver, upper respiratory tract, skin, central nervous system (CNS). Repeated or prolonged exposure to the substance can produce target organs damage.

Section 4: First Aid Measures

Eye Contact:

Check for and remove any contact lenses. Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Cold water may be used. Get medical attention.

Skin Contact:

In case of contact, immediately flush skin with plenty of water. Cover the irritated skin with an emollient. Remove contaminated clothing and shoes. Cold water may be used. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention.

Serious Skin Contact:

Wash with a disinfectant soap and cover the contaminated skin with an anti-bacterial cream. Seek medical attention.

Inhalation:

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention if symptoms appear.

Serious Inhalation:

Evacuate the victim to a safe area as soon as possible. Loosen tight clothing such as a collar, tie, belt or waistband. If breathing is difficult, administer oxygen. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek medical attention.

Ingestion:

Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention if symptoms appear.

Serious Ingestion: Not available.

Section 5: Fire and Explosion Data

Flammability of the Product: Flammable.

Auto-Ignition Temperature: 363°C (685.4°F)

Flash Points: CLOSED CUP: 12.78°C (55°F). OPEN CUP: 17.78°C (64°F) (Cleveland).

Flammable Limits: LOWER: 3.3% UPPER: 19%

Products of Combustion: These products are carbon oxides (CO, CO₂).

Fire Hazards in Presence of Various Substances:

Highly flammable in presence of open flames and sparks, of heat. Slightly flammable to flammable in presence of oxidizing materials.

Explosion Hazards in Presence of Various Substances:

Risks of explosion of the product in presence of mechanical impact: Not available. Slightly explosive in presence of open flames and sparks, of heat, of oxidizing materials, of acids.

Fire Fighting Media and Instructions:

Flammable liquid, soluble or dispersed in water. SMALL FIRE: Use DRY chemical powder. LARGE FIRE: Use alcohol foam, water spray or fog.

Special Remarks on Fire Hazards:

Containers should be grounded. CAUTION: MAY BURN WITH NEAR INVISIBLE FLAME Vapor may travel considerable distance to source of ignition and flash back. May form explosive mixtures with air. Contact with Bromine pentafluoride is likely to cause fire or explosion. Ethanol ignites on contact with chromyl chloride. Ethanol ignites on contact with iodine heptafluoride gas. It ignites than explodes upon contact with nitrosyl perchlorate. Addition of platinum black catalyst caused ignition.

Special Remarks on Explosion Hazards:

Ethanol has an explosive reaction with the oxidized coating around potassium metal. Ethanol ignites and then explodes on contact with acetic anhydride + sodium hydrosulfate (ignites and may explode), disulfuric acid + nitric acid, phosphorous(III) oxide platinum, potassium-tert-butoxide+ acids. Ethanol forms explosive products in reaction with the following compound :

ammonia + silver nitrate (forms silver nitride and silver fulminate), iodine + phosphorus (forms ethane iodide), magnesium perchlorate (forms ethyl perchlorate), mercuric nitrate, nitric acid + silver (forms silver fulminate) silver nitrate (forms ethyl nitrate) silver(I) oxide + ammonia or hydrazine (forms silver nitride and silver fulminate), sodium (evolves hydrogen gas). Sodium Hydrazide + alcohol can produce an explosion. Alcohols should not be mixed with mercuric nitrate, as explosive mercuric fulminate may be formed. May form explosive mixture with manganese perchlorate + 2,2-dimethoxypropane. Addition of alcohols to highly concentrate hydrogen peroxide forms powerful explosives. Explodes on contact with calcium hypochlorite

Section 6: Accidental Release Measures

Small Spill:

Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container.

Large Spill:

Flammable liquid. Keep away from heat. Keep away from sources of ignition. Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not touch spilled material. Prevent entry into sewers, basements or confined areas; dike if needed. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

Section 7: Handling and Storage

Precautions:

Keep locked up.. Keep away from heat. Keep away from sources of ignition. Ground all equipment containing material. Do not ingest. Do not breathe gas/fumes/ vapor/spray. Wear suitable protective clothing. In case of insufficient ventilation, wear suitable respiratory equipment. If ingested, seek medical advice immediately and show the container or the label. Avoid contact with skin and eyes. Keep away from incompatibles such as oxidizing agents, acids, alkalis, moisture.

Storage:

Store in a segregated and approved area. Keep container in a cool, well-ventilated area. Keep container tightly closed and sealed until ready for use. Avoid all possible sources of ignition (spark or flame). Do not store above 23°C (73.4°F).

Section 8: Exposure Controls/Personal Protection

Engineering Controls:

Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.

Personal Protection:

Splash goggles. Lab coat. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves. Use a respirator if the exposure limit is exceeded.

Personal Protection in Case of a Large Spill:

Splash goggles. Full suit. Vapor respirator. Boots. Gloves. A self contained breathing apparatus should be used to avoid inhalation of the product. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Exposure Limits:

TWA: 1900 (mg/m³) from OSHA (PEL) [United States] TWA: 1000 (ppm) from OSHA (PEL) [United States] TWA: 1900 (mg/m³) from NIOSH [United States] TWA: 1000 (ppm) from NIOSH [United States] TWA: 1000 (ppm) [United Kingdom (UK)] TWA: 1920 (mg/m³) [United Kingdom (UK)] TWA: 1000 STEL: 1250 (ppm) [Canada] Consult local authorities for acceptable exposure limits.

Section 9: Physical and Chemical Properties

Physical state and appearance: Liquid. (Liquid.)

Odor:

Mild to strong, rather pleasant; like wine or whiskey. Alcohol-like; Ethereal, vinous.

Taste: Pungent. Burning.

Molecular Weight: 46.07 g/mole

Color: Colorless. Clear

pH (1% soln/water): Not available.

Boiling Point: 78.5°C (173.3°F)

Melting Point: -114.1°C (-173.4°F)

Critical Temperature: 243°C (469.4°F)

Specific Gravity: 0.789 (Water = 1)

Vapor Pressure: 5.7 kPa (@ 20°C)

Vapor Density: 1.59 (Air = 1)

Volatility: Not available.

Odor Threshold: 100 ppm

Water/Oil Dist. Coeff.: The product is more soluble in water; log(oil/water) = -0.3

Ionicity (in Water): Not available.

Dispersion Properties: See solubility in water, methanol, diethyl ether, acetone.

Solubility:

Easily soluble in cold water, hot water. Soluble in methanol, diethyl ether, acetone.

Section 10: Stability and Reactivity Data

Stability: The product is stable.

Instability Temperature: Not available.

Conditions of Instability: Incompatible materials, heat, sources of ignition.

Incompatibility with various substances: Reactive with oxidizing agents, acids, alkalis.

Corrosivity: Non-corrosive in presence of glass.

Special Remarks on Reactivity:

Ethanol rapidly absorbs moisture from the air. Can react vigorously with oxidizers. The following oxidants have been demonstrated to undergo vigorous/explosive reaction with ethanol: barium perchlorate, bromine pentafluoride, calcium hypochlorite, chloryl perchlorate, chromium trioxide, chromyl chloride, dioxygen difluoride, disulfuryl difluoride, fluorine nitrate, hydrogen peroxide, iodine heptafluoride, nitric acid nitrosyl perchlorate, perchloric acid permanganic acid, peroxodisulfuric acid, potassium dioxide, potassium perchlorate, potassium permanganate, ruthenium(VIII) oxide, silver perchlorate, silver peroxide, uranium hexafluoride, uranyl perchlorate. Ethanol reacts violently/expodes with the following compounds: acetyl bromide (evolves hydrogen bromide) acetyl chloride, aluminum, sesquibromide ethylate, ammonium hydroxide & silver oxide, chlorate, chromic anhydride, cyanuric acid + water, dichloromethane + sulfuric acid + nitrate (or) nitrite, hydrogen peroxide + sulfuric acid, iodine + methanol + mercuric oxide, manganese perchlorate + 2,2-dimethoxy propane, perchlorates, permanganates + sulfuric acid, potassium superoxide, potassium tert-butoxide, silver & nitric acid, silver perchlorate, sodium hydrazide, sulfuric acid + sodium dichromate, tetrachlorosilane + water. Ethanol is also incompatible with platinum, and sodium. No really safe conditions exist under which ethyl alcohol and chlorine oxides can be handled. Reacts vigorously with acetyl chloride

Special Remarks on Corrosivity: Not available.

Polymerization: Will not occur.

Section 11: Toxicological Information

Routes of Entry: Absorbed through skin. Dermal contact. Eye contact. Inhalation. Ingestion.

Toxicity to Animals:

WARNING: THE LC50 VALUES HEREUNDER ARE ESTIMATED ON THE BASIS OF A 4-HOUR EXPOSURE. Acute oral toxicity (LD50): 3450 mg/kg [Mouse]. Acute toxicity of the vapor (LC50): 39000 mg/m3 4 hours [Mouse].

Chronic Effects on Humans:

CARCINOGENIC EFFECTS: A4 (Not classifiable for human or animal.) by ACGIH. MUTAGENIC EFFECTS: Mutagenic for mammalian somatic cells. Mutagenic for bacteria and/or yeast. TERATOGENIC EFFECTS: Classified PROVEN for human. DEVELOPMENTAL TOXICITY: Classified Development toxin [PROVEN]. Classified Reproductive system/toxin/female, Reproductive system/toxin/male [POSSIBLE]. Causes damage to the following organs: blood, the reproductive system, liver, upper respiratory tract, skin, central nervous system (CNS).

Other Toxic Effects on Humans:

Hazardous in case of skin contact (irritant), of inhalation. Slightly hazardous in case of skin contact (permeator), of ingestion.

Special Remarks on Toxicity to Animals:

Lowest Published Dose/Conc: LDL[Human] - Route: Oral; Dose: 1400 mg/kg LDL[Human child] - Route: Oral; Dose: 2000 mg/kg LDL[Rabbit] - Route: Skin; Dose: 20000 mg/kg

Special Remarks on Chronic Effects on Humans:

May affect genetic material (mutagenic) Causes adverse reproductive effects and birth defects (teratogenic) , based on moderate to heavy consumption. May cause cancer based on animal data. Human: passes through the placenta, excreted in maternal milk.

Special Remarks on other Toxic Effects on Humans:

Acute potential health effects: Skin: causes skin irritation Eyes: causes eye irritation Ingestion: May cause gastrointestinal tract irritation with nausea, vomiting, diarrhea, and alterations in gastric secretions. May affect behavior/central nervous system (central nervous system depression - amnesia, headache, muscular incoordination, excitation, mild euphoria, slurred speech, drowsiness, staggering gait, fatigue, changes in mood/personality, excessive talking, dizziness, ataxia, somnolence, coma/narcosis, hallucinations, distorted perceptions, general anesthetic), peripheral nervous system (spastic paralysis)vision (diplopia). Moderately toxic and narcotic in high concentrations. May also affect metabolism, blood, liver, respiration (dyspnea), and endocrine system. May affect respiratory tract, cardiovascular(cardiac arrhythmias, hypotension), and urinary systems. Inhalation: May cause irritation of the respiratory tract and affect behavior/central nervous system with symptoms similar to ingestion. Chronic Potential Health Effects: Skin: Prolonged or repeated skin contact may casue dermatitis, an allergic reaction. Ingestion: Prolonged or repeated ingestion will have similiar effects as acute ingestion. It may also affect the brain.

Section 12: Ecological Information

Ecotoxicity: Ecotoxicity in water (LC50): 14000 mg/l 96 hours [Rainbow trout]. 11200 mg/l 24 hours [fingerling trout].

BOD5 and COD: Not available.

Products of Biodegradation:

Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.

Toxicity of the Products of Biodegradation: The product itself and its products of degradation are not toxic.

Special Remarks on the Products of Biodegradation: Not available.

Section 13: Disposal Considerations

Waste Disposal:

Waste must be disposed of in accordance with federal, state and local environmental control regulations.

Section 14: Transport Information

DOT Classification: CLASS 3: Flammable liquid.

Identification: : Ethanol UNNA: 1170 PG: II

Special Provisions for Transport: Not available.

Section 15: Other Regulatory Information

Federal and State Regulations:

California prop. 65: This product contains the following ingredients for which the State of California has found to cause cancer, birth defects or other reproductive harm, which would require a warning under the statute: Ethyl alcohol 200 Proof (in alcoholic beverages) California prop. 65: This product contains the following ingredients for which the State of California has found to cause birth defects which would require a warning under the statute: Ethyl alcohol 200 Proof (in alcoholic beverages) Connecticut hazardous material survey.: Ethyl alcohol 200 Proof Illinois toxic substances disclosure to employee act: Ethyl alcohol 200 Proof Rhode Island RTK hazardous substances: Ethyl alcohol 200 Proof Pennsylvania RTK: Ethyl alcohol 200 Proof Florida: Ethyl alcohol 200 Proof Minnesota: Ethyl alcohol 200 Proof Massachusetts RTK: Ethyl alcohol 200 Proof Massachusetts spill list: Ethyl alcohol 200 Proof New Jersey: Ethyl alcohol 200 Proof Tennessee: Ethyl alcohol 200 Proof California - Directors List of Hazardous Substances (8 CCR 339): Ethyl alcohol 200 Proof TSCA 8(b) inventory: Ethyl alcohol 200 Proof

Other Regulations:

OSHA: Hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200). EINECS: This product is on the European Inventory of Existing Commercial Chemical Substances.

Other Classifications:

WHMIS (Canada):

CLASS B-2: Flammable liquid with a flash point lower than 37.8°C (100°F). CLASS D-2A: Material causing other toxic effects (VERY TOXIC).

DSCL (EEC):

R11- Highly flammable. S7- Keep container tightly closed. S16- Keep away from sources of ignition - No smoking.

HMIS (U.S.A.):

Health Hazard: 2

Fire Hazard: 3

Reactivity: 0

Personal Protection: E

National Fire Protection Association (U.S.A.):

Health: 2

Flammability: 3

Reactivity: 0

Specific hazard:

Protective Equipment:

Gloves. Lab coat. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Wear appropriate respirator when ventilation is inadequate. Splash goggles.

Section 16: Other Information

References:

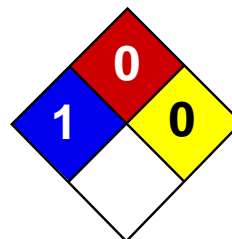
-SAX, N.I. Dangerous Properties of Industrial Materials. Toronto, Van Nostrand Reinold, 6e ed. 1984. -Material safety data sheet emitted by: la Commission de la Santé et de la Sécurité du Travail du Québec. -Hawley, G.G.. The Condensed Chemical Dictionary, 11e ed., New York N.Y., Van Nostrand Reinold, 1987. -The Sigma-Aldrich Library of Chemical Safety Data, Edition II. HSDB, RTECS, and LOLI databases.

Other Special Considerations: Not available.

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Health	3
Fire	0
Reactivity	0
Personal Protection	

Material Safety Data Sheet

Sodium Hypochlorite, 5% MSDS

Section 1: Chemical Product and Company Identification

Product Name: Sodium Hypochlorite, 5%

Catalog Codes: SLS1654

CAS#: Mixture.

RTECS: Not applicable.

TSCA: TSCA 8(b) inventory: Sodium hypochlorite; Sodium hydroxide; Water

CI#: Not applicable.

Synonym: Chlorine Bleach, Bleach, Soda Bleach, Chlorox; Sodium Hypochlorite, Solution, 5% Available Chlorine

Chemical Name: Hypochlorous acid, sodium salt, solution

Chemical Formula: Not applicable.

Contact Information:

Sciencelab.com, Inc.

14025 Smith Rd.

Houston, Texas 77396

US Sales: **1-800-901-7247**

International Sales: **1-281-441-4400**

Order Online: ScienceLab.com

CHEMTREC (24HR Emergency Telephone), call:

1-800-424-9300

International CHEMTREC, call: 1-703-527-3887

For non-emergency assistance, call: 1-281-441-4400

Section 2: Composition and Information on Ingredients

Composition:

Name	CAS #	% by Weight
Sodium hypochlorite	7681-52-9	4-7
Sodium hydroxide	1310-73-2	<1
Water	7732-18-5	>92

Toxicological Data on Ingredients: Sodium hypochlorite: ORAL (LD50): Acute: 5800 mg/kg [Mouse]. 8910 mg/kg [Rat].

Section 3: Hazards Identification

Potential Acute Health Effects:

Very hazardous in case of skin contact (irritant), of eye contact (irritant), of ingestion, . Hazardous in case of skin contact (corrosive), of eye contact (corrosive). Slightly hazardous in case of inhalation (lung sensitizer). Non-corrosive for lungs. Liquid or spray mist may produce tissue damage particularly on mucous membranes of eyes, mouth and respiratory tract. Skin contact may produce burns. Inhalation of the spray mist may produce severe irritation of respiratory tract, characterized by coughing, choking, or shortness of breath. Prolonged exposure may result in skin burns and ulcerations. Over-exposure by inhalation may cause respiratory irritation. Inflammation of the eye is characterized by redness, watering, and itching. Skin inflammation is characterized by itching, scaling, reddening, or, occasionally, blistering.

Potential Chronic Health Effects:

Slightly hazardous in case of skin contact (sensitizer). CARCINOGENIC EFFECTS: Classified 3 (Not classifiable for human.) by IARC [Sodium hypochlorite]. MUTAGENIC EFFECTS: Mutagenic for bacteria and/or yeast. [Sodium hypochlorite]. Mutagenic for mammalian somatic cells. [Sodium hydroxide]. TERATOGENIC EFFECTS: Not available. DEVELOPMENTAL TOXICITY: Not available. The substance may be toxic to lungs, mucous membranes, skin, eyes. Repeated or prolonged exposure to the substance can produce target organs damage. Repeated or prolonged contact with spray mist may produce chronic eye irritation and severe skin irritation. Repeated or prolonged exposure to spray mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection.

Section 4: First Aid Measures**Eye Contact:**

Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. Get medical attention immediately.

Skin Contact:

In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Cover the irritated skin with an emollient. Cold water may be used. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention immediately.

Serious Skin Contact:

Wash with a disinfectant soap and cover the contaminated skin with an anti-bacterial cream. Seek medical attention.

Inhalation:

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately.

Serious Inhalation:

Evacuate the victim to a safe area as soon as possible. Loosen tight clothing such as a collar, tie, belt or waistband. If breathing is difficult, administer oxygen. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek medical attention.

Ingestion:

Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention if symptoms appear.

Serious Ingestion: Not available.

Section 5: Fire and Explosion Data

Flammability of the Product: Non-flammable.

Auto-Ignition Temperature: Not applicable.

Flash Points: Not applicable.

Flammable Limits: Not applicable.

Products of Combustion: Not available.

Fire Hazards in Presence of Various Substances: combustible materials, metals, organic materials

Explosion Hazards in Presence of Various Substances:

Slightly explosive in presence of open flames and sparks. Non-explosive in presence of shocks.

Fire Fighting Media and Instructions: Not applicable.

Special Remarks on Fire Hazards:

Releases chlorine when heated above 35 deg. C. The substance itself is non-combustible and does not burn. However, when heated to decomposition it emits corrosive and/or toxic fumes. May ignite combustibles. Fire risk in contact with organic materials. Contact with metals may evolve flammable hydrogen gas.

Special Remarks on Explosion Hazards:

Anydrous Sodium Hypochlorite is very explosive. Primary amines and calcium hypochlorite or sodium hypochlorite react to form normal chloroamines, which are explosive. Interaction of ethyleneimine with sodium (or other) hypochlorite gives the explosive N-chloro cmpd. Removal of formic acid from industrial waste streams with sodium hypochlorite soln becomes explosive at 55 deg C. Several explosions involving methanol and sodium hypochlorite were attributed to formation of methyl hypochlorite, especially in presence of acid or other esterification catalyst. Use of sodium hypochlorite soln to destroy acidified benzyl cyanide residues caused a violent explosion, thought to have been due to formation of nitrogen trichloride. (Sodium hypochlorite)

Section 6: Accidental Release Measures**Small Spill:**

Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container.

Large Spill:

Corrosive liquid. Oxidizing material. Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not get water inside container. Avoid contact with a combustible material (wood, paper, oil, clothing...). Keep substance damp using water spray. Do not touch spilled material. Use water spray curtain to divert vapor drift. Prevent entry into sewers, basements or confined areas; dike if needed. Call for assistance on disposal. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

Section 7: Handling and Storage**Precautions:**

Keep locked up.. Keep container dry. Keep away from heat. Keep away from sources of ignition. Keep away from combustible material.. Do not ingest. Do not breathe gas/fumes/ vapor/spray. Never add water to this product. In case of insufficient ventilation, wear suitable respiratory equipment. If ingested, seek medical advice immediately and show the container or the label. Avoid contact with skin and eyes. Keep away from incompatibles such as reducing agents, combustible materials, organic materials, metals, acids.

Storage:

Keep container tightly closed. Keep container in a cool, well-ventilated area. Separate from acids, alkalies, reducing agents and combustibles. See NFPA 43A, Code for the Storage of Liquid and Solid Oxidizers. Air Sensitive Sensitive to light. Store in light-resistant containers.

Section 8: Exposure Controls/Personal Protection**Engineering Controls:**

Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value.

Personal Protection:

Face shield. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves. Boots.

Personal Protection in Case of a Large Spill:

Splash goggles. Full suit. Vapor respirator. Boots. Gloves. A self contained breathing apparatus should be used to avoid inhalation of the product. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Exposure Limits:

Sodium hypochlorite TWA: 1 CEIL: 1 (ppm as Cl₂) STEL: 1 (ppm as Cl₂) from ACGIH (TLV) [United States] Sodium hydroxide STEL: 2 (mg/m³) from ACGIH (TLV) [United States] TWA: 2 CEIL: 2 (mg/m³) from OSHA (PEL) [United States] CEIL: 2 (mg/m³) from NIOSH Consult local authorities for acceptable exposure limits.

Section 9: Physical and Chemical Properties

Physical state and appearance: Liquid.

Odor: Characteristic. Chlorine-like (Slight.)

Taste: Not available.

Molecular Weight: Not applicable.

Color: Colorless to light greenish yellow

pH (1% soln/water): Neutral.

Boiling Point: Decomposition temperature: 40°C (104°F)

Melting Point: Not available.

Critical Temperature: Not available.

Specific Gravity: 1.07 - 1.093 (Water = 1)

Vapor Pressure: 2.3 kPa (@ 20°C)

Vapor Density: The highest known value is 0.62 (Air = 1) (Water).

Volatility: Not available.

Odor Threshold: Not available.

Water/Oil Dist. Coeff.: Not available.

Ionicity (in Water): Not available.

Dispersion Properties: See solubility in water.

Solubility: Easily soluble in cold water.

Section 10: Stability and Reactivity Data

Stability: The product is stable.

Instability Temperature: Not available.

Conditions of Instability: Incompatible materials. light, air, heat

Incompatibility with various substances: Reactive with reducing agents, combustible materials, organic materials, metals, acids.

Corrosivity:

Extremely corrosive in presence of aluminum. Corrosive in presence of stainless steel(304), of stainless steel(316). Non-corrosive in presence of glass.

Special Remarks on Reactivity:

Decomposed by carbon dioxide from air. Slowly decomposes on contact with air. Unstable in air unless mixed with sodium hydroxide. Incompatible with ammonium acetate, ammonium carbonate, ammonium nitrate, ammonium oxalate, and ammonium phosphate. Decomposition of sodium hypochlorite takes place within a few seconds with these salts. Also incompatible with primary amines, phenyl acetonitrile, ethyleneimine, methanol, acidified benzyl cyanide, formic acid, urea, nitro compounds, methylcellulose, cellulose, aziridine, ether, ammonia. Mixing this product with chemicals (e.g. ammonia, acids, detergents, etc.) or organic matter (e.g. urine, feces, etc.) will release chlorine gas. Chloramine gas may be evolved when ammonia and bleach are mixed. Decomposed by hot water. Sensitive to light. Exposure to light accelerates decomposition.

Special Remarks on Corrosivity:

Sodium Hypochlorite is extremely corrosive to brass, and moderately corrosive to bronze. There is no corrosivity information for copper.

Polymerization: Will not occur.

Section 11: Toxicological Information

Routes of Entry: Absorbed through skin. Eye contact. Inhalation. Ingestion.

Toxicity to Animals: Acute oral toxicity (LD50): 5800 mg/kg [Mouse]. (Sodium hypochlorite).

Chronic Effects on Humans:

CARCINOGENIC EFFECTS: Classified 3 (Not classifiable for human.) by IARC [Sodium hypochlorite]. **MUTAGENIC EFFECTS:** Mutagenic for bacteria and/or yeast. [Sodium hypochlorite]. Mutagenic for mammalian somatic cells. [Sodium hydroxide]. Contains material which may cause damage to the following organs: lungs, mucous membranes, skin, eyes.

Other Toxic Effects on Humans:

Very hazardous in case of skin contact (irritant), of ingestion, . Hazardous in case of skin contact (corrosive), of eye contact (corrosive). Slightly hazardous in case of inhalation (lung sensitizer, lung corrosive).

Special Remarks on Toxicity to Animals: Not available.

Special Remarks on Chronic Effects on Humans: May affect genetic material (mutagenic) (Sodium hypochlorite)

Special Remarks on other Toxic Effects on Humans:

Potential Health Effects: Can cause severe irritation and possible burns to skin and eyes. Eye contact may also cause corneal and conjunctival edema, conjunctival hemorrhages. Contact with skin may also cause vesicular eruptions and eczematoid dermatitis which becomes evident upon re-exposure. Prolonged or repeated eye contact may cause conjunctivitis. Ingestion can cause burns to the digestive tract. Symptoms may include: 1. pain and inflammation of the mouth, pharynx, esophagus, and stomach, 2. erosion of the mucous membranes (chiefly of the stomach), nausea, vomiting, choking, coughing, hemorrhage, 3. circulatory collapse with cold and clammy skin (due to methemoglobinemia), cyanosis, and shallow respirations, 4. confusion, delirium, coma, 5. edema of the pharynx, glottis, larynx with stridor and obstruction, 6. perforation of the esophagus, or stomach, with mediastinitis or peritonitis. Inhalation causes slight to severe respiratory tract irritation and delayed pulmonary edema. Prolonged or repeated inhalation may cause allergic respiratory reaction (asthma).

Section 12: Ecological Information

Ecotoxicity: Not available.

BOD5 and COD: Not available.

Products of Biodegradation:

Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.

Toxicity of the Products of Biodegradation: The product itself and its products of degradation are not toxic.

Special Remarks on the Products of Biodegradation: Not available.

Section 13: Disposal Considerations

Waste Disposal:

Dilute with water and flush to sewer if local ordinances allow, otherwise, whatever cannot be saved for recovery or recycling should be managed in an appropriate and approved waste disposal facility. Waste must be disposed of in accordance with federal, state and local environmental control regulations.

Section 14: Transport Information

DOT Classification: Class 8: Corrosive material

Identification: : Hypochlorite solution UNNA: 1791 PG: III

Special Provisions for Transport: Not available.

Section 15: Other Regulatory Information

Federal and State Regulations:

Illinois toxic substances disclosure to employee act: Sodium hydroxide Illinois chemical safety act: Sodium hydroxide New York release reporting list: Sodium hydroxide Rhode Island RTK hazardous substances: Sodium hydroxide Pennsylvania RTK: Sodium hypochlorite; Sodium hydroxide Florida: Sodium hypochlorite Minnesota: Sodium hypochlorite; Sodium hydroxide Massachusetts RTK: Sodium hypochlorite; Sodium hydroxide New Jersey: Sodium hypochlorite; Sodium hydroxide Louisiana spill reporting: Sodium hydroxide TSCA 8(b) inventory: Sodium hypochlorite; Sodium hydroxide; Water CERCLA: Hazardous substances.: Sodium hypochlorite: 100 lbs. (45.36 kg); Sodium hydroxide: 1000 lbs. (453.6 kg);

Other Regulations: OSHA: Hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200).

Other Classifications:

WHMIS (Canada): CLASS E: Corrosive liquid.

DSCL (EEC):

R8- Contact with combustible material may cause fire. R31- Contact with acids liberates toxic gas. R36/38- Irritating to eyes and skin. S28- After contact with skin, wash immediately with plenty of water. S36/37/39- Wear suitable protective clothing, gloves and eye/face protection. S45- In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

HMIS (U.S.A.):

Health Hazard: 3

Fire Hazard: 0

Reactivity: 0

Personal Protection:

National Fire Protection Association (U.S.A.):

Health: 1

Flammability: 0

Reactivity: 0

Specific hazard:

Protective Equipment:

Gloves. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Wear appropriate respirator when ventilation is inadequate. Face shield.

Section 16: Other Information

References: Not available.

Other Special Considerations: Not available.

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Last Updated: 05/21/2013 12:00 PM

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SAFETY DATA SHEET

Propane

Section 1. Identification

GHS product identifier	: Propane
Chemical name	: propane
Other means of identification	: Propyl hydride; n-Propane; Dimethyl methane; Bottled gas; propane in gaseous state; propane liquefied, n-Propane; Dimethylmethane; Freon 290; Liquefied petroleum gas; Lpg; Propyl hydride; R 290; C3H8; UN 1075; UN 1978; A-108; Hydrocarbon propellant.
Product use	: Synthetic/Analytical chemistry.
Synonym	: Propyl hydride; n-Propane; Dimethyl methane; Bottled gas; propane in gaseous state; propane liquefied, n-Propane; Dimethylmethane; Freon 290; Liquefied petroleum gas; Lpg; Propyl hydride; R 290; C3H8; UN 1075; UN 1978; A-108; Hydrocarbon propellant.
SDS #	: 001045
Supplier's details	: Airgas USA, LLC and its affiliates 259 North Radnor-Chester Road Suite 100 Radnor, PA 19087-5283 1-610-687-5253
24-hour telephone	: 1-866-734-3438

Section 2. Hazards identification

OSHA/HCS status	: This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).
Classification of the substance or mixture	: FLAMMABLE GASES - Category 1 GASES UNDER PRESSURE - Liquefied gas

GHS label elements

Hazard pictograms



Signal word

: Danger

Hazard statements

: Extremely flammable gas.
Contains gas under pressure; may explode if heated.
May cause frostbite.
May form explosive mixtures in Air.
May displace oxygen and cause rapid suffocation.

Precautionary statements

General

: Read and follow all Safety Data Sheets (SDS'S) before use. Read label before use. Keep out of reach of children. If medical advice is needed, have product container or label at hand. Close valve after each use and when empty. Use equipment rated for cylinder pressure. Do not open valve until connected to equipment prepared for use. Use a back flow preventative device in the piping. Use only equipment of compatible materials of construction. Always keep container in upright position. Approach suspected leak area with caution.

Prevention

: Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.

Response

: Leaking gas fire: Do not extinguish, unless leak can be stopped safely. Eliminate all ignition sources if safe to do so.

Storage

: Protect from sunlight when ambient temperature exceeds 52°C/125°F. Store in a well-ventilated place.

Section 2. Hazards identification

- Disposal** : Not applicable.
- Hazards not otherwise classified** : In addition to any other important health or physical hazards, this product may displace oxygen and cause rapid suffocation.

Section 3. Composition/information on ingredients

- Substance/mixture** : Substance
- Chemical name** : propane
- Other means of identification** : Propyl hydride; n-Propane; Dimethyl methane; Bottled gas; propane in gaseous state; propane liquefied, n-Propane; Dimethylmethane; Freon 290; Liquefied petroleum gas; Lpg; Propyl hydride; R 290; C3H8; UN 1075; UN 1978; A-108; Hydrocarbon propellant.

CAS number/other identifiers

- CAS number** : 74-98-6
- Product code** : 001045

Ingredient name	%	CAS number
Propane	100	74-98-6

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

- Eye contact** : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention if irritation occurs.
- Inhalation** : Remove victim to fresh air and keep at rest in a position comfortable for breathing. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention if adverse health effects persist or are severe. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.
- Skin contact** : Wash contaminated skin with soap and water. Remove contaminated clothing and shoes. To avoid the risk of static discharges and gas ignition, soak contaminated clothing thoroughly with water before removing it. Get medical attention if symptoms occur. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- Ingestion** : As this product is a gas, refer to the inhalation section.

Most important symptoms/effects, acute and delayed

Potential acute health effects

- Eye contact** : No known significant effects or critical hazards.
- Inhalation** : No known significant effects or critical hazards.
- Skin contact** : No known significant effects or critical hazards.
- Frostbite** : Try to warm up the frozen tissues and seek medical attention.
- Ingestion** : As this product is a gas, refer to the inhalation section.

Over-exposure signs/symptoms

- Eye contact** : No specific data.
- Inhalation** : No specific data.
- Skin contact** : No specific data.

Section 4. First aid measures

Ingestion : No specific data.

Indication of immediate medical attention and special treatment needed, if necessary

- Notes to physician** : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.
- Specific treatments** : No specific treatment.
- Protection of first-aiders** : No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

- Suitable extinguishing media** : Use an extinguishing agent suitable for the surrounding fire.
- Unsuitable extinguishing media** : None known.

Specific hazards arising from the chemical : Contains gas under pressure. Extremely flammable gas. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
carbon dioxide
carbon monoxide

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Contact supplier immediately for specialist advice. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool. If involved in fire, shut off flow immediately if it can be done without risk. If this is impossible, withdraw from area and allow fire to burn. Fight fire from protected location or maximum possible distance. Eliminate all ignition sources if safe to do so.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

- For non-emergency personnel** : Accidental releases pose a serious fire or explosion hazard. No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Shut off all ignition sources. No flares, smoking or flames in hazard area. Avoid breathing gas. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.
- For emergency responders** : If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Ensure emergency procedures to deal with accidental gas releases are in place to avoid contamination of the environment. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

- Small spill** : Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment.

Section 6. Accidental release measures

- Large spill** : Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Contains gas under pressure. Avoid contact with eyes, skin and clothing. Avoid breathing gas. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use only non-sparking tools. Empty containers retain product residue and can be hazardous. Do not puncture or incinerate container. Use equipment rated for cylinder pressure. Close valve after each use and when empty. Protect cylinders from physical damage; do not drag, roll, slide, or drop. Use a suitable hand truck for cylinder movement.

- Advice on general occupational hygiene** : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

- Conditions for safe storage, including any incompatibilities** : Store in accordance with local regulations. Store in a segregated and approved area. Store away from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10). Eliminate all ignition sources. Keep container tightly closed and sealed until ready for use. Cylinders should be stored upright, with valve protection cap in place, and firmly secured to prevent falling or being knocked over. Cylinder temperatures should not exceed 52 °C (125 °F).

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
Propane	NIOSH REL (United States, 10/2013). TWA: 1800 mg/m ³ 10 hours. TWA: 1000 ppm 10 hours. OSHA PEL (United States, 2/2013). TWA: 1800 mg/m ³ 8 hours. TWA: 1000 ppm 8 hours. OSHA PEL 1989 (United States, 3/1989). TWA: 1800 mg/m ³ 8 hours. TWA: 1000 ppm 8 hours.

- Appropriate engineering controls** : Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

- Environmental exposure controls** : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

Section 8. Exposure controls/personal protection

- Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
- Eye/face protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: safety glasses with side-shields.
- Skin protection**
- Hand protection** : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.
- Body protection** : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. When there is a risk of ignition from static electricity, wear anti-static protective clothing. For the greatest protection from static discharges, clothing should include anti-static overalls, boots and gloves.
- Other skin protection** : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Respiratory protection** : Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

Section 9. Physical and chemical properties

Appearance

- Physical state** : Gas. [Liquefied compressed gas.]
- Color** : Colorless.
- Molecular weight** : 44.11 g/mole
- Molecular formula** : C₃H₈
- Boiling/condensation point** : -161.48°C (-258.7°F)
- Melting/freezing point** : -187.6°C (-305.7°F)
- Critical temperature** : 96.55°C (205.8°F)
- Odor** : Odorless.BUT MAY HAVE SKUNK ODOR ADDED.
- Odor threshold** : Not available.
- pH** : Not available.
- Flash point** : Closed cup: -104°C (-155.2°F)
Open cup: -104°C (-155.2°F)
- Burning time** : Not applicable.
- Burning rate** : Not applicable.
- Evaporation rate** : Not available.
- Flammability (solid, gas)** : Extremely flammable in the presence of the following materials or conditions: open flames, sparks and static discharge and oxidizing materials.
- Lower and upper explosive (flammable) limits** : Lower: 1.8%
Upper: 8.4%
- Vapor pressure** : 109 (psig)
- Vapor density** : 1.6 (Air = 1)

Section 9. Physical and chemical properties

Specific Volume (ft³/lb)	: 8.6206
Gas Density (lb/ft³)	: 0.116 (25°C / 77 to °F)
Relative density	: Not applicable.
Solubility	: Not available.
Solubility in water	: 0.0244 g/l
Partition coefficient: n-octanol/water	: 1.09
Auto-ignition temperature	: 287°C (548.6°F)
Decomposition temperature	: Not available.
SADT	: Not available.
Viscosity	: Not applicable.

Section 10. Stability and reactivity

Reactivity	: No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	: The product is stable.
Possibility of hazardous reactions	: Under normal conditions of storage and use, hazardous reactions will not occur.
Conditions to avoid	: Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.
Incompatible materials	: Oxidizers
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.
Hazardous polymerization	: Under normal conditions of storage and use, hazardous polymerization will not occur.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Not available.

IDLH : 2100 ppm

Irritation/Corrosion

Not available.

Sensitization

Not available.

Mutagenicity

Not available.

Carcinogenicity

Not available.

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Section 11. Toxicological information

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Eye contact : No known significant effects or critical hazards.
Inhalation : No known significant effects or critical hazards.
Skin contact : No known significant effects or critical hazards.
Ingestion : As this product is a gas, refer to the inhalation section.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact : No specific data.
Inhalation : No specific data.
Skin contact : No specific data.
Ingestion : No specific data.

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Potential chronic health effects

Not available.

General : No known significant effects or critical hazards.
Carcinogenicity : No known significant effects or critical hazards.
Mutagenicity : No known significant effects or critical hazards.
Teratogenicity : No known significant effects or critical hazards.
Developmental effects : No known significant effects or critical hazards.
Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Not available.

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Product/ingredient name	LogP _{ow}	BCF	Potential
Propane	1.09	-	low

Mobility in soil






Soil/water partition coefficient (K_{oc}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Empty Airgas-owned pressure vessels should be returned to Airgas. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Empty containers or liners may retain some product residues. Do not puncture or incinerate container.

Section 14. Transport information

	DOT	TDG	Mexico	IMDG	IATA
UN number	UN1978	UN1978	UN1978	UN1978	UN1978
UN proper shipping name	PROPANE	PROPANE	PROPANE	PROPANE	PROPANE
Transport hazard class(es)	2.1 	2.1 	2.1 	2.1 	2.1 
Packing group	-	-	-	-	-
Environment	No.	No.	No.	No.	No.
Additional information	Limited quantity Yes. Packaging instruction Passenger aircraft Quantity limitation: Forbidden. Cargo aircraft Quantity limitation: 150 kg Special provisions 19, T50	Product classified as per the following sections of the Transportation of Dangerous Goods Regulations: 2.13-2.17 (Class 2). Explosive Limit and Limited Quantity Index 0.125 ERAP Index 3000	-	-	Passenger and Cargo Aircraft Quantity limitation: 0 Forbidden Cargo Aircraft Only Quantity limitation: 150 kg

Section 14. Transport information

	<p>For domestic transportation only, UN1075 may be substituted for the UN number shown as long as the substitution is consistent on package markings, shipping papers, and emergency response information. See 49 CFR 172.102 Special Provision 19.</p> <p>Containers of NON-ODORIZED liquefied petroleum gas must be marked either NON-ODORIZED or NOT ODORIZED as of September 30, 2006. [49 CFR 172.301(f), 326(d), 330(c) and 338 (e)]</p>	<p><u>Passenger Carrying Ship Index</u> 65</p> <p><u>Passenger Carrying Road or Rail Index</u> Forbidden</p> <p><u>Special provisions</u> 29, 42</p>			
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“Refer to CFR 49 (or authority having jurisdiction) to determine the information required for shipment of the product.”

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code : Not available.

Section 15. Regulatory information

U.S. Federal regulations : **TSCA 8(a) CDR Exempt/Partial exemption:** Not determined
United States inventory (TSCA 8b): This material is listed or exempted.
Clean Air Act (CAA) 112 regulated flammable substances: propane

Clean Air Act Section 112 (b) Hazardous Air Pollutants (HAPs) : Not listed

Clean Air Act Section 602 Class I Substances : Not listed

Clean Air Act Section 602 Class II Substances : Not listed

DEA List I Chemicals (Precursor Chemicals) : Not listed

DEA List II Chemicals (Essential Chemicals) : Not listed

SARA 302/304

Composition/information on ingredients

No products were found.

SARA 304 RQ : Not applicable.

SARA 311/312

Classification : Refer to Section 2: Hazards Identification of this SDS for classification of substance.

State regulations

Section 15. Regulatory information

Massachusetts	: This material is listed.
New York	: This material is not listed.
New Jersey	: This material is listed.
Pennsylvania	: This material is listed.

International regulations

International lists

National inventory

Australia	: This material is listed or exempted.
Canada	: This material is listed or exempted.
China	: This material is listed or exempted.
Europe	: This material is listed or exempted.
Japan	: This material is listed or exempted.
Malaysia	: This material is listed or exempted.
New Zealand	: This material is listed or exempted.
Philippines	: This material is listed or exempted.
Republic of Korea	: This material is listed or exempted.
Taiwan	: This material is listed or exempted.

Canada

WHMIS (Canada)	: Class A: Compressed gas. Class B-1: Flammable gas.
CEPA Toxic substances:	This material is not listed.
Canadian ARET:	This material is not listed.
Canadian NPRI:	This material is listed.
Alberta Designated Substances:	This material is not listed.
Ontario Designated Substances:	This material is not listed.
Quebec Designated Substances:	This material is not listed.

Section 16. Other information

Canada Label requirements	: Class A: Compressed gas. Class B-1: Flammable gas.
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Hazardous Material Information System (U.S.A.)

Health	*	1
Flammability		4
Physical hazards		2

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on SDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

National Fire Protection Association (U.S.A.)



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Section 16. Other information

Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Procedure used to derive the classification

Classification	Justification
Flam. Gas 1, H220 Press. Gas Liq. Gas, H280	Expert judgment Expert judgment

History

Date of printing : 6/28/2017

Date of issue/Date of revision : 6/28/2017

Date of previous issue : 10/20/2015

Version : 0.02

Key to abbreviations :

- ATE = Acute Toxicity Estimate
- BCF = Bioconcentration Factor
- GHS = Globally Harmonized System of Classification and Labelling of Chemicals
- IATA = International Air Transport Association
- IBC = Intermediate Bulk Container
- IMDG = International Maritime Dangerous Goods
- LogPow = logarithm of the octanol/water partition coefficient
- MARPOL 73/78 = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
- UN = United Nations

References : Not available.

▀ Indicates information that has changed from previously issued version.

Other special considerations :

The information below is given to call attention to the issue of "Naturally occurring radioactive materials". Although Radon-222 levels in the product represented by this MSDS do not present any direct Radon exposure hazard, customers should be aware of the potential for Radon daughter build up within their processing systems, whatever the source of their product streams. Radon-222 is a naturally occurring radioactive gas which can be a contaminant in natural gas. During subsequent processing, Radon tends to be concentrated in Liquefied Petroleum Gas streams and in product streams having a similar boiling point range. Industry experience has shown that this product may contain small amounts of Radon-222 and its radioactive decay products, called Radon "daughters". The actual concentration of Radon-222 and radioactive daughters in the delivered product is dependent on the geographical source of the natural gas and storage time prior to delivery. Process equipment (i.e. lines, filters, pumps and reaction units) may accumulate significant levels of radioactive daughters and show a gamma radiation reading during operation. A potential external radiation hazard exists at or near any pipe valve or vessel containing a Radon enriched stream, or containing internal deposits of radioactive material due to the transmission of gamma radiation through its wall. Field studies reported in the literature have not shown any conditions that subject workers to cumulative exposures in excess of general population limits. Equipment emitting gamma radiation should be presumed to be internally contaminated with alpha emitting decay products which may be a hazard if inhaled or ingested. Protective equipment such as coveralls, gloves, and respirator (NIOSH/MHSA approved for high efficiency particulates and radionuclides, or supplied air) should be worn by personnel entering a vessel or working on contaminated process equipment to prevent skin contamination, ingestion, or inhalation of any residues containing alpha radiation. Airborne contamination may be minimized by handling scale and/or contaminated materials in a wet state.

Notice to reader

Section 16. Other information

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

22.0 APPENDIX: EMPLOYEE MANUAL

Bound separately

23.0 APPENDIX: LOG OF INSPECTIONS, RECORDS, AND DATA COLLECTION

Insert here or bind separately