



ODOR CONTROL PLAN

Capital City Cultivation

Source / Facility Name: Capital City Cultivation, LLC

Primary Contact: Philippe Denis

Address and Mailing Address: 2210 Channing St.
NE Washington, DC 20018

Phone: O: (202) 506-2266
C: (202) 507-2960

Email: Philippe.Denis@cannabistcompany.com

Type: Cultivation Facility

Hours of Operation: 6:00am – 4:30pm M-F
9:00 – 11:00am Saturday
9:00 – 11:00am Sunday

Description: This facility houses a production infrastructure for cultivating, cloning, harvesting, pollination, processing, and transport to dispensing facilities in the District of Columbia.

Emergency Contact: Chad Bartlett | (602) 369-9416



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Odor Management Plan

I. Introduction

Odor control is integral to ensuring community impact from our facility is only positive. We acknowledge our responsibility to improve odor control and ventilation technology to ensure we meet or exceed District of Columbia Municipal Regulations. Additionally, program rules dictate, "No registration shall be issued to a cultivation center or dispensary located in a residential-use district as defined in the Zoning Regulations and shown in the official atlases of the Zoning Commission for the District." Being in non-residential areas helps mitigate the likelihood of erroneous odors becoming a nuisance.

This plan outlines the Company's efforts to mitigate, to the greatest extent possible, odor from a licensed premises from being perceptible to an ordinary person at the exterior of the building of the licensed premises or any space adjoining the licensed premises.

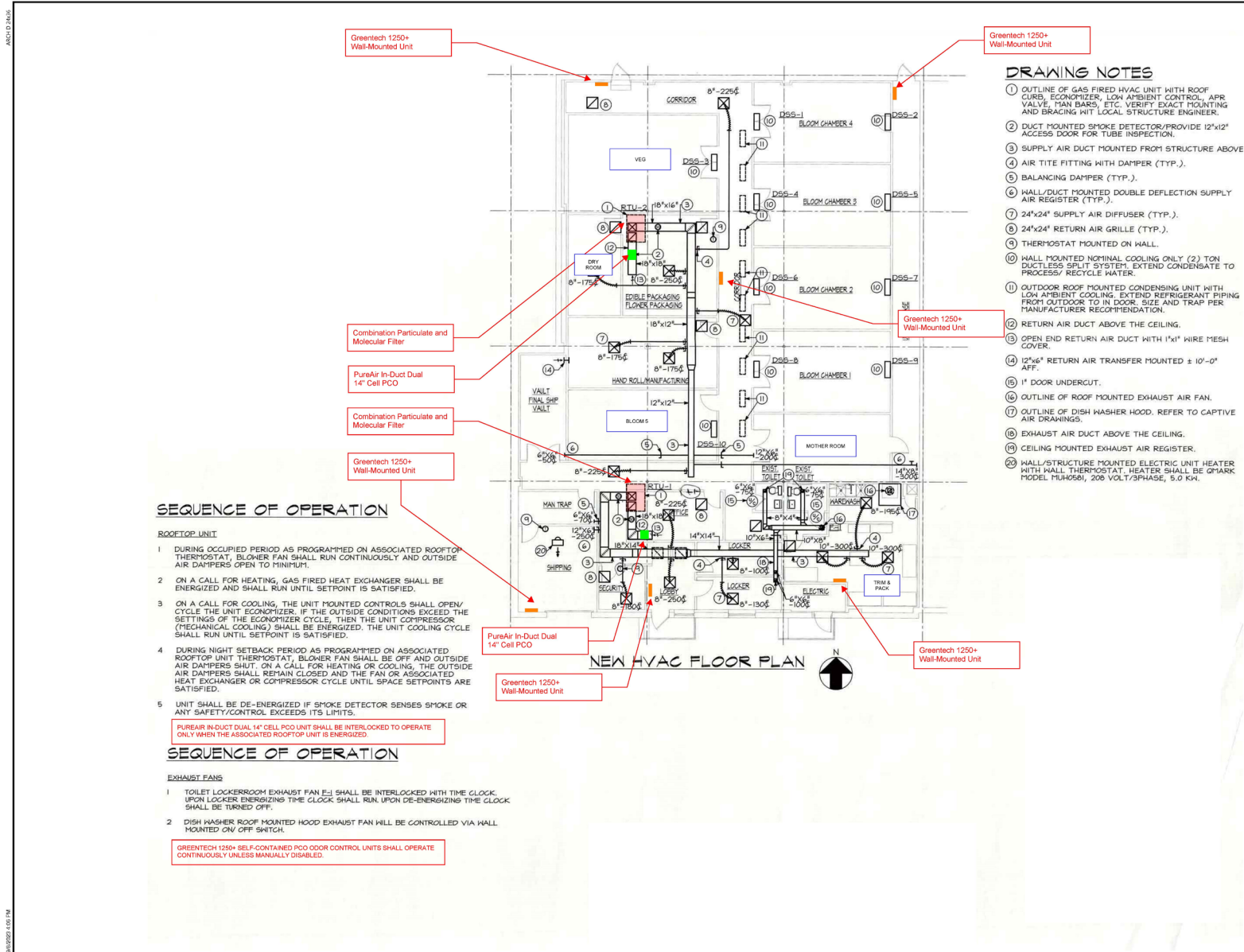
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II. Odor Generation

Floor Plan



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Rochester, NY 14604
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fax: 585.252.4652



CULTIVATION AND MANUFACTURING FACILITY

CENTER CITY CULTIVATION
2210 CHANNING ST., N.E.
WASHINGTON, DC 20018

Date Revised	Description

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Project Manager S. CAMPBELL	Discipline Lead J. ALBRIGHT
Designer J. ALBRIGHT	Reviewer E. GRAVES
Date Issued 09/05/22	Project Number 220109MA

Sheet Name
CHANNING ODOR CONTROL PLAN

Drawing Number
M101

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Odor-Emitting Activity

Specific Odor-Emitting Activities

Primarily, the Processing Areas are at the highest potential for odors because of the numerous activities within them, including:

- Trimming: removing leaves and other less cannabinoid-rich content from the plants.
- Rolling: Marijuana fresh from curing is rolled into papers for pre-rolled, ready-to-consume packaged goods.
- Packaging: for individual products and in bulk for distribution and transport.

Secondarily, the following activities may produce scents within the facility:

- Secure Waste Disposal: Waste product is mixed with soil and other organic compounds which also masks the scent. Compacting in this secured area also mitigates odors.
- Cultivation: the cloning, vegetation, flowering, and harvesting of plants. This is the largest segment of the facility.
- Drying: Plants fresh from harvesting are trimmed of leaves and other byproducts before hanging upside down to remove all moisture.

Because these areas are primarily segregated to protect the health of the plants, these protective measures have the added effect of isolating scents within each area.

Phases (Timing, Length)

Regardless of staff presence or production phases, the following scent-producing functions are ongoing:

- Vegetation
- Flowering
- Clone room storage
- Secure waste storage

The following odor-producing processes occur during scheduled times, as follows:

- Harvesting: Thursday, 6:00 am – 10:00 am
- Production: Monday – Friday in shifts from 7:30 am – 4:30 pm
- Secure Waste Disposal: Twice daily Monday – Friday

III. Current Odor Mitigation Procedures and Practices

Odor Prevention and Isolation

One of the best forms of odor treatment is preventive. As such, Capital City Cultivation prevents open-air exposure of product as much as possible to prevent noxious odors from being released. Production, trimming, extraction, and vacuum packaging of our products occur in separate and designated areas of the facility. We vacuum-seal the products in odor-proof containers and grow, harvest, cure, and manufacture them under standard operating procedures that limit the spread of odors outside the designated areas. For plants and plant material, once an acceptable cure is achieved, the flower is carefully weighed and packaged in containers in a variety of

Additionally, cannabis cultivated in our cultivation facility is grown using natural substances which helps eliminate the release of any harmful airborne or waterborne substances.

Air Conditioning and Heating

HVAC equipment naturally cycles the air in the environment, affording us the advantage of being proactive rather than reactive.

We take advantage of the existing systems and use carbon-infused filters within the system to scrub the air. All air must pass through this filter, ensuring that no odor lingers. *These filters are replaced quarterly according to our preventative maintenance plan to prevent a gradual decrease in performance.*

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Strategic prevention through inventory management and around-the-clock HVAC filtration and sanitation systems ensures the air inside and outside of our location is clean and free of odors to the greatest extent possible.

Quest Portable Dehumidifiers

Humidity control is of vital importance in cultivation activities. We utilize Quest Portable dehumidifiers in each of our growing and drying rooms. These dehumidifiers provide for MERV 11 FILTRATION which captures airborne particles before exhausting to common airspace, where the air is further processed through the HVAC carbon filters.

Daily Cleaning

Cleaning is completed daily for all areas of the facility. The bleach solution works to not only mitigate pests and disease but is also strong enough to mitigate any lingering odors. Additionally, the thorough cleaning efforts keep all areas free of loose cannabis particles that can cause ambient odors. The following is an excerpt from our standard operating procedure for cleaning requirements and expectations:

“Daily cleaning is part of keeping the cultivation area free from pests and diseases. A simple bleach method (1 T per gallon of water) is used, however, the PPM (parts per million) should be around 200 PPM. This is a safe level that is strong enough to kill mold and bacteria, but safe enough for plants. Prior to actual cleaning, and since the facility will have PPM meters, employees will check the levels to make sure that enough bleach-to-water solution is used, but also levels are low enough not to cause any damage to plant matter. Bleach is used for cleaning because of its ability to kill most bacteria and mold. Floors are swept gently to not produce any dust, and then light mopping will take place daily. During cycle changes, meaning new plants moved to vegetative stage, vegetative stage to pre-flowering stage, and pre-flowering to flowering stage, rooms will be sanitized prior to the transplant. This includes washing of all floors. A water and bleach solution is used to clean reservoirs, aerator pumps, water pumps and to flush all irrigation lines.”

Daily Equipment Troubleshooting

In addition to daily cleaning, every piece of equipment undergoes daily troubleshooting to ensure proper functionality, which helps ensure odors are predictable and mitigated as outlined in all standard procedures.

Administrative Controls

Maintenance, Testing, and Audit Procedures

Our maintenance staff maintains a calendar to ensure preventative maintenance checks are performed quarterly. Carbon filters are replaced regularly per product specifications. Logs are kept after performing all activities.

The Facilities Department and Cultivation Staff escalate equipment malfunctions immediately to remediate the issue as well as any resulting increase in odor emissions by the end of the next business day after the discovery of the occurrence.

Staff Training

Training includes:

- In-person instruction with procedures delineated per work areas within the facility (e.g., grow chambers, cure, processing, etc.).
- Administrative procedures and operational processes (e.g., ensuring the facility has no open containers of raw cannabis unless necessary during harvest or processing.)
- Instructional Signage: posted in conspicuous areas of the facility.

From these platforms, the following face-to-face training procedures take place:

- Operations Managers receive training on all facility openings, air ducts, and developing workflows to eliminate the need for opening windows and minimize the frequency of people opening doors via access restriction. Workflows are segmented into specific time intervals; for example, opening dry rooms only at exact intervals. Managers are also trained to escalate malfunctions that directly affect odor control.

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- Cultivation Associates receive training on restricted and scheduled tasks to minimize doors opening and eliminate free movement between facility areas. All job descriptions are designed to be location-specific for this reason. They are also trained to escalate malfunctions directly affecting odor control.
- Facilities Associates are trained in varying modules depending on the machinery they are to maintain, how procedures are updated, and how often we acquire new technologies. They perform maintenance and do not handle regulated materials. Facilities Associates are also trained to escalate malfunctions that directly affect odor control.

Recordkeeping Procedures and Forms

- The Facility Operations Manager performs regularly scheduled audits to ensure that maintenance on engineering controls is being done, logs are being kept, and records are being maintained.
- Our Accounting Department tracks all investments and receipts for equipment purchases, component purchases, and repair orders.
- Our Facilities Department keeps calendars and documentation for planning, dispatching, and logging maintenance and repairs, including replacing carbon filters or deciding to seek consultation. Logs are kept after performing all activities. The Facilities Department and Cultivation Staff escalate malfunctions immediately so that steps may be taken to remediate the malfunction as well as any resulting increase in odor emissions by the end of the next business day after the discovery.

IV. Approved, Engineer-Recommended Mitigation Equipment

Engineering Report Strategy

As of October 2023, our facility has been approved for the following supplemental odor mitigation recommended by a professional, licensed engineering firm. In addition to the existing passive and active mitigation techniques (e.g., respectively, effective HVAC equipment and odor isolation practices), the following are approved and scheduled for installation.

Please note that the following is directly quoted from the engineering report. The full report can be provided, upon request.

“The following technologies and equipment will be utilized:

1. Preparation, manufacturing, support spaces, and areas without a direct source of odor, but with doors to the exterior, shall be provided with smaller wall mounted PCO units. This equipment is fully self-contained and utilizes Photocatalytic Oxidation (PCO) technology. An Ultraviolet light source activates a catalyst to produce ions which actively break down VOC's and odorous molecules to greatly improve the air quality and reduce detectable odors within the space. These units shall operate continuously to minimize odor in spaces opening directly to the exterior. The design equipment used for this application shall be the Greentech 1250+ PCO air purification unit. Service and maintenance of the device shall be per the manufacturer's instructions and guidelines.
2. The building is served by two central rooftop HVAC units. RTU-1 primarily serves the support spaces at the front of the building. RTU-2 serves the grow and manufacturing areas. Each unit utilizes an air plenum return with a central duct returning air to the RTU. This return duct shall be provided with a high capacity PCO and bipolar ionization device. The PCO function operates similar to the self-contained units. The bipolar ionization creates an attraction between particles in the air stream, leading to larger particle sizes, which are more effectively filtered out. These air purification units shall be interlocked to operate anytime the associated Rooftop Unit is operating. Design equipment for this application shall be the PureAir HVAC In-Duct Air Purification unit, Dual 14" Cell. Service and maintenance of the device shall be per the manufacturer's instructions and guidelines.
3. Each RTU shall have the standard particulate air filters replaced with a combination particulate and molecular air filter. This filter shall match the 'Minimum Efficiency Reporting Value' (MERV Rating) of the existing pre-filter as well as incorporate 'Rapid Adsorption Dynamic' (RAD) media to remove odor. Filters shall initially be replaced on a 3-month basis. This schedule shall be adjusted as necessary to provide the required odor control while maximizing the longevity of the filters.”

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Equipment for Installation

Room Name	Room Size	Odor Control Equipment
Grow Corridor	830 sqft	Greentech 1250+ Wall-mounted Unit.
Utility Corridor	360 sqft	Greentech 1250+ Wall-mounted Unit.
Main Corridor	830 sqft	Greentech 1250+ Wall-mounted Unit.
Shipping	210 sqft	Greentech 1250+ Wall-mounted Unit.
Main Lobby	100 sqft	Greentech 1250+ Wall-mounted Unit.
Trim and Pack	400 sqft	Greentech 1250+ Wall-mounted Unit.
RTU-1 (Support spaces)	NA	PureAir HVAC In-Duct Dual 14" Cell PCO & bipolar Ionization Camfil CityPleat Particulate/Molecular Filters
RTU-2 (Grow Spaces)	NA	PureAir HVAC In-Duct Dual 14" Cell PCO & bipolar Ionization Camfil CityPleat Particulate/Molecular Filters

V. Receiving, Responding to, and Tracking Complaints

Receiving Complaints

In the event of any complaint about odor, which may be received verbally, via email to facility management, or via the contact link at the main Cannabist Company website (<https://cannabistcompany.com/contact-us>).

Responding to Complaints

Upon receipt of a complaint, the recipient of the complaint immediately escalates it to the applicable person (e.g., an associate would escalate to management, management to Legal/Compliance, etc.). Once escalated, management and Legal/Compliance analyze the complaint to determine the appropriate response, which can include but is not limited to: HVAC maintenance, equipment purchases, etc.

Tracking Complaints

The Legal Department records and stores complaints, violations, and/or citations upon receipt in a digital platform.

VI. Conclusion

We believe mitigation is not enough. It takes a combination of prevention, mitigation, and routine maintenance to ensure a virtually odor-free establishment. These time-tested techniques and formulas have mitigated violations and will remain as such in the District of Columbia. There are many best practices to odor mitigation but eliminating them requires a combination of practices resulting from years of successful experimentation and experience.

In conclusion, preventing odor is as important as all our company values and philosophies. We strive to be good community partners and maintain strict compliance with all regulations, while constantly improving our best practices in the interest of the communities in which we operate.



November 2, 2023

Ryan West
Director, National Construction
Columbia Care Inc.
680 Fifth Avenue
24th Floor
New York, NY 10151

RE: Odor Control Plan

**Capital City Cultivation, LLC
2210 Channing Street
N.E. Washington, DC 20018**

Dear Mr. West:

We have reviewed the *District of Columbia Municipal Regulations, Title 20, Section 20-903 Odorous or Other Nuisance Air Pollutants*. In accordance with these requirements, the attached Odor Control Plan (Version V3, dated 08-2023) for the facility listed above has been submitted.

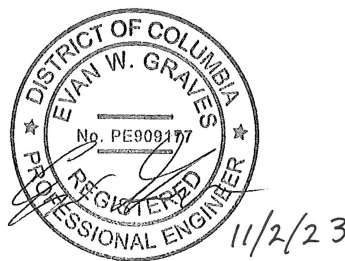
The Odor Control Plan consists of the following components as outlined in Section 903.5 (c)(2)(A):

- (i) System design
- (ii) Operational processes
- (iii) Maintenance plan

Pursuant to Section 903.5 (c)(2), an engineering controls plan (*Odor Control Plan – Engineering Controls* dated October 18, 2023) has been developed by Bergmann for the site, detailing the type, location, and operational sequence for equipment required to remove odorous or other nuisance air pollutants generated by the cultivation and manufacturing facility. In addition, descriptions of operational processes and maintenance plans have been provided by the facility owner and have been reviewed by Bergmann.

After careful assessment and taking into consideration various factors, including the absence of odor complaints and the installation of infrastructure that supports odor control, we have determined that the Odor Control Plan proposed is currently sufficient.

BERGMANN



Evan W. Graves, P.E.

Department Manager | Mechanical

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