

August 2nd, 2022

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Re: Odor Mitigation /Water Usage Review of No-Ral Properties LLC's Cannabis Cultivation and Manufacturing facility planned for 6 Norino Way, Georgetown, MA 01833.

Requested by:

Sumul Shah

Georgetown, MA 01833

(781) 389 – 4671

Materials and Documents Reviewed:

1. Narrative – Marijuana Business – Cultivation and Manufacturing
2. Odor Mitigation Plan
3. Stormwater Report
4. Special Conditions Documents
5. Applications
6. Site Plan
7. Memo – Odor Control

Overall Assessments:

Odor Mitigation Concerns

Upon thorough review of the site's Odor Mitigation Plan the following observations were identified as a concern for the neighbors surrounding the site for 6 Norino Way in Georgetown, MA:

- Within the Odor Mitigation Plan, The HVAC systems were explained along with how they may function, however the style of filters to be used within the systems was not identified in any of the documentation or related plans for the HVAC systems for 6 Norino Way.

The concern is that if a strong enough filter, such as a MERV 13 or better, is not utilized within the facility's systems that it will not capture many of the odor causing molds, particulates, and other odor causing materials to exit out into the open air, thus causing potential nuisance odors that could negatively impact the surrounding neighbors.

The odor mitigation plan specifically states that the installed system should adequately capture the odors, particulates, molds and other materials and foreign matter from affecting the surrounding areas.

- The Odor Mitigation Plan for 6 Norino Way does not include procedures, equipment, or practices that clean the facility within. For example, to mitigate the growth of odor causing molds and particulates from escaping the building envelope a room will be decontaminated prior to having new plants or products stored within. This is a pivotal process that ensure that anything not caught by the HVAC system is cleaned and mitigated.

The concern here is that a "deep cleaning" or internal decontamination plan should be required to ensure that not only will the HVAC systems clean the air, but the practices within the rooms where these smells and odors are generated are mitigated using clean room best practices.

This plan may include but should not be limited to using approved cleaning agents and practices to clean all exposed walls, floors, vents, tables, racks, and internal ducting. This is to ensure that the HVAC system captures anything airborne, while the cleaning practices capture anything left on the surfaces within the room.

If not cleaned during regular operations or between harvest cycles, molds, particulates and other foreign materials could be kicked up or disturb resulting in increased airborne materials that may lead to odors escaping the system.

- Within the facility at 6 Norino way they note that it will contain a Kitchen on the second floor. It appears that this kitchen will utilize marijuana material in some manner. Kitchens use ovens and stovetops that utilize Ansell systems and are known to cause an abundance of odors that could potentially adversely affect the surrounding neighbors.

The concern is that the Kitchen may need supportive carbon filtering in addition to the overhead HVAC systems as these smells are more apparent, especially when ovens are used when infusing products with marijuana.

Also, important to note that often with a Kitchen operation you have extraction operations and lab equipment being used to process solvents used throughout the process. The HVAC system may have different requirements for these spaces given the types of products they wish to make

and the solvents that may be used. All of these could potentially be contributing factors regarding odor concerns for the surrounding neighbors.

At this time, it is not clear if the operations occurring at 6 Norino Way will include extraction, processing, use of distillation machines, use of vacuum ovens. All of which must adhere to strict building code on how those spaces are constructed outlined in NFPA 1 Chapter 38 for Marijuana Extraction and Processing.

Water Usage and Disposal Concerns

An analysis of the sites industrial water uses and disposal was reviewed and the following concerns were observed:

- The facility planned for 6 Norino Way is not connected to a wastewater sewer system and is supplied water from the Town of Georgetown. This will mean that all industrial wastewater collected onsite will need to be stored in a separate liquid waste storage tank to be treated and hauled offsite for proper disposal. This would be separate from any collected stormwater which is extensively called out within the provided documents.

The operations planned within the facility for 6 Norino Way consists of Cloning, Nursery, Cultivation, and Manufacturing that will create industrial wastewater that will need to be evaluated for its constituents and treated based on the analysis report of the water waste generated at the facility.

There seems to be no plan in place to collect, store, treat, and dispose of this industrial water waste. It is critical that this plan be in place to protect the surrounding neighborhoods from potential contamination from unknown substances.

It is also important to note that within the special conditions for 6 Norino Way, they must install a water storage tank for all production wastewater from cannabis related operations.

- The facility located at 6 Norino Way does not appear to include a plan to mitigate or reduce the water needs for the building as to prevent a disruption or cause a nuisance to the surrounding neighbors.

It is known that Cloning, Nurseries, Cultivation and Production require substantial amounts of supplied water for operations. Our concern is that the water demand may be taxing on the municipal systems thus causing a nuisance to the surrounding neighbors.

Additional Concerns:

- The initial Narrative states that the site at 6 Norino Way has been zoned for “light industrial” uses and the company states within this narrative that the operations occurring at 6 Norino Way will fall under the “by right” clause for the zoned area.

After review of the plan, the claim to use the “by right” clause may be an understatement as the operations occurring within require a large amount of electricity to power all the HVAC, Lighting for cultivation, and water for fertigation needs and may exceed the allowance for a “by right” claim.

- A Hazardous Waste Plan was not observed within the provided plans for 6 Norino Way and thus leads to the concern that these wastes may be inappropriately disposed of. Within these types of cultivation and manufacturing spaces the needs for various chemicals such as oxidizers, fertilizers, acids, and solvents are vast causing many different types of chemicals to be used. Each chemical should be evaluated prior to being utilized within the facility and a hazardous waste plan implemented to ensure the wastes are correctly disposed or recycled.

The overall concern is the lack of a hazardous/universal waste plan for 6 Norino Way to ensure those chemical waste streams are identified and handled as required by law. If not managed accordingly, it could lead to foul odors or potentially harmful chemicals from affecting the surrounding neighbors.

Conclusion:

Upon completion of the review for 6 Norino Way I find that there is cause to believe that the surrounding neighbors will likely be exposed to undesirable odors, a high demand on municipal water supply systems, as well as a high concern for how wastes (Hazardous & Non-Hazardous) generated at 6 Norino Way will adversely affect the surrounding areas and neighbors leading to potentially negative impacts to the surrounding areas.

The neighbors of 6 Norino Way want assurance that this facility will not cause a nuisance to any of the aforementioned concerns. It is our hope that these concerns will not be taken lightly, and responses will be provided on how they will ensure compliance regarding all the requirements for Odor Mitigation, Production Wastewater, and Chemical Wastes.

This report was compiled by:

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Overview:

I am an experienced and passionate Compliance, Safety, Facilities and Security expert with almost 7 years of experience within the cannabis industry. I have worked in several markets across the United States including MA, FL, NV, CA, NJ, TX, OH, ME, NY, CO as well as an operation located in Spain. I have spent most of my career in cannabis working through these departments helping to shape the industry for the better. Things I look for in a company are Diversity, Empowerment, Social Equity or Economic Empowerment, and Leadership Development Training.

Objective:

A consistent overachiever who is also a goal-driven, hardworking, and dedicated solutions-based company man. I put my best effort forth at the task at hand for my employer. I believe that through strategic planning, excellent communication, and strong leadership any goal is achievable.

Experience:

Bud & Mary's (South Shore Buds)

Marshfield, MA

August 2021 - Present

Director of Operations

- Maintain a thorough understanding of, and stay up to date on, all applicable state and local regulations and requirements
- Work with the Directors of Compliance, Retail, Cultivation & Production, and Human Resources to develop Policies and Procedures to ensure operational compliance within all processes while maintaining a high safety standard
- Develop & maintain a safe, healthy, diverse, and efficient work environment that produces high quality recreational cannabis products
- Collaborate with the President and the Director of Administration in the development of performance goals and long-term operational plans
- Maximize efficiency and productivity through extensive process analysis and interdepartmental collaboration
- Work with the CEO, President, Director of Products, Architects, Engineers, Contractors, and Consultants to develop the facilities and frameworks needed for critical operations as well as applicable permitting, licensing, and other requirements as needed
- Set strategic goals for operational efficiency and increased productivity
- Work with the CEO and President on the development of financial and budgetary plans to maximize use of existing capital and project future needs
- Analyze existing operational processes and performance, recommending solutions for improvement when necessary
- Develop, implement, and monitor day-to-day operational systems and processes that provide visibility of goals, progress, and obstacles for our key initiatives
- Build, maintain and develop relationships with all department heads, external partners, and vendors to make decisions regarding operational activity and strategic goals
- Plan, monitor, and analyze key metrics for the day-to-day performance of the operations to ensure efficient and timely completion of tasks
- Devise strategies to ensure growth of programs enterprise-wide, identifying and implementing process improvements that will maximize output and minimize costs
- Uphold organization policies and standards, ensuring legislative regulations are followed
- Work closely with Director of Administration to lead the team with integrity and establish and maintain a trusting, inclusive and productive environment that is as diverse as it is welcoming

**Hybrid Compliance Solutions
President/Owner**

Seekonk, MA

June 2021 – Present

- Provide consulting services to single license and vertically integrated cannabis operations within the Commonwealth of Massachusetts
- Provide oversight on the design, engineering, and setup of cannabis cultivation, production, manufacturing, processing, transportation, security, human resources, and compliance.
- Ensure that spaces are designed and provided with the correct environmental controls, engineering controls, and administrative controls to ensure each space containing cannabis will have the right environmental conditions best favorable to the plant
- Assist with operational flow of materials through the facility and different departments
- Help to provide operators with odor mitigation, mold mitigation and remediation plans based on existing setups or future construction
- Provide expert oversight and guidance on all hazardous/universal waste programs, licensing, permitting, training, and operations
- Assist with initial and renewal of any licensing needs for the operation. This includes complete application submission, agent submissions, Renewals for all licenses
- Help to create and construct all necessary standard operating procedures and policies
- Provide security assessments and recommendations to the licensed facilities and transportation operations
- Conduct facility wide compliance, safety, and facility reports with corrective actions outlined to leadership
- Act as the project manager to assist licensed facilities with the implementation of new processes or equipment.
- Provide regulatory interpretation and guidance to mitigate risk and liability to the licensed operators while protecting the safety of persons at any given facility.
- Provides completed OSHA safety requirement plans to operators seeking to improve their safety initiatives

Parallel Holdings (Acquired NETA-2019) Atlanta, Georgia
Director of Safety & Inspection

September 2019 – June 2021

- Be the authority on all aspects of Environmental Health & Safety for the global organization
- Assist the VP, GRC with due diligence reviews for emerging markets and/or potential acquisitions
- Build and maintain expert knowledge of federal OSHA standards and all related/ancillary laws, rules and regulations, such as local health, building and environmental codes
- Responsible for the design, implementation, maintenance and oversight of global Environmental Health and Safety (EHS) programs and management of EHS team
- Direct and oversee an EHS Team to coordinate and execute on all aspects of Parallel's EHS programs
- Maintain all necessary EHS documentation, permits and reports
- Direct and oversee hazard and risk assessments across all areas of the organization
- Oversee accident reporting and investigations to analyze cause to develop procedures or controls to prevent recurrence and ensure proper accident reporting requirements
- Collect and analyze injury data to identify trends and recommend improvements using the RACI reporting model
- Direct, oversee and respond to third-party review and analyses (air quality, noise, ergonomics, etc.), as commissioned, to identify health and safety hazards to employees. Analyze results to recommend corrective measures via engineering and/or administrative controls as appropriate
- Plan and implement programs and train managers, supervisors, and employees on worksite safety practices, loss-prevention, ergonomics, and correct handling techniques for chemicals, equipment, and other materials
- Develop and administer, in coordination with Parallel's security team, facility emergency and first aid procedures, including drills
- Facilitate and lead the review, audit and inspection of Parallel's operating facilities to identify safety and operational compliance gaps and oversee the execution of necessary changes or initiatives

- Oversee Incident Management Programs in coordination with compliance and security teams to ensure proper notification and correspondence with all regulatory bodies and authorities
- Conduct or direct the internal investigation of and follow up on compliance or safety issues
- Implement industry best practices for safety and operational compliance, while maintaining a focus on efficient, effective and innovative operations
- Ensure the upkeep and enforcement of Parallel's policies and procedures and SOPs, providing guidance and oversight of operational changes to ensure continued safety and compliance
- Ensure compliance with established internal control procedures by examining records, reports, operating practices, and records
- Direct and Oversee the Workers Compensation Program for Parallel's organizations across the country.

**New England Treatment Access
Compliance & Safety Manager**

Franklin, MA

October 2018 – September 2019

- Maintain a thorough understanding of and stay up to date on all applicable state and local regulations and requirements including expert, practical knowledge of all Medical, Recreational, and Co-located Marijuana Establishments, applicable sub-regulations and all governmental safety and health rules and regulations.
- Ensure the health and safety of all employees, visitors, and contractors through the adherence to all applicable standards, regulations, policies, and procedures related to OSHA, HAZMAT, NIOSH, ADA, IATA, RCRA, ANSI, all federal rules and regulations, and local law
- Ensure the upkeep and enforcement of NETA's policies and procedures and SOPs, providing guidance and oversight of operational changes to ensure safety and compliance.
- Ensure compliance with established internal control procedures by examining records, reports, operating practices, and records.
- Serve as a compliance resource and decision maker for compliance questions for staff and managers.
- Manage the audit program of NETA's Holistic Control Plan and perform internal compliance audits in coordination with NETA's compliance team Operations Specialists or Internal Auditor.
- Communicate Investigative findings by preparing necessary reports and presenting to NETA's Director of Operational Compliance and other senior management, as applicable.
- Develop company-wide plans, programs, and implement safety policies and procedures in compliance with all governmental safety and health rules and regulations for ensuring workplace health and safety.
- Plan and implement programs to train managers, supervisors, and employees in work site safety practices, loss-prevention, ergonomics, and correct handling techniques for chemicals, equipment, and other materials.
- Develop and administer, in coordination with NETA's security manager, facility emergency and first aid procedures, including drills, and training
- Direct and oversee sampling and studies (air, noise, ergonomics, etc.) to identify health and safety hazards to employees. Analyze results to recommend corrective measures via engineering and/or administrative controls as appropriate.
- Maintain all necessary EHS documentation, permits and reports.
- Build and propose EHS budget for necessary EHS equipment, training or other expenses.
- Manage EHS Specialists to coordinate and execute on all aspects of NETA's EHS program. Set objectives, assess performance and manage development plans.
- Oversee hazard and risk assessments across all areas of the organization.
- Lead all accident investigations to analyze cause to develop procedures or controls to prevent recurrence.
- Analyze, Investigate, and resolve safety concerns with staff members and provide action plans and solutions based on staff medical concerns and issues.
- Collect and analyze injury data to identify trends and recommend improvements.

- Oversee NETA's Incident Management Program in coordination with NETA's Security Manager and to ensure proper notification and correspondence with all regulatory bodies and authorities.
- Organize and lead NETA's internal Safety Committee to enhance EHS programs and prioritize and address outstanding safety issues or concerns and facilitate monthly safety meetings, safety site walks, and assist management with general staff safety meetings.
- Interact and provide visible leadership to all staff in the cultivation facility, research labs, extraction labs, MIP lab, kitchen, office, retail, and warehouse areas to drive safety awareness, engagement, and improvements.
- In coordination with EHS specialists and Compliance Operations Specialists, continually monitor and observe facility conditions, equipment, and work tasks in order to identify and immediately address compliance or safety concerns
- Perform and manage projects and assignments to improve safety and create operational efficiencies and improvements as directed by the Director of Operational Compliance.

**New England Treatment Access
Audit & Safety Compliance Officer**

Franklin, MA

June 2018 - October 2018

- Maintain a thorough understanding of and stay up to date on all applicable state and local regulations and requirements including expert, practical knowledge of all Medical, Recreational, and Co-located Marijuana Establishments
- Ensure the upkeep and enforcement of NETA's policies and procedures and SOPs, providing guidance and oversight of operational changes to ensure complete safety and compliance
- Develop, implement, and maintain a comprehensive, company-wide Environmental Health & Safety program for ensuring workplace health and safety
- Complete hazard and risk assessments across all areas of the organization
- Investigate the causes of accidents and other unsafe conditions on the job sites
- Develop, Implement, and Oversee NETA's Incident Management Program in coordination with NETA's Director of Operational Compliance and Security Manager
- Manage the Audit Program for NETA's Holistic Control Plan and perform internal safety and compliance audits
- Created and implemented staff training for all required tasks, environments and roles required by Federal OSHA regulations
- Perform and manage projects and assignments to improve safety and create operational efficiencies and improvements as directed by the Director of Operational Compliance

**New England Treatment Access
Internal Compliance Auditor**

Franklin, MA

April 2017 - June 2018

- Maintain a thorough understanding of and stay up to date on all applicable state and local regulations and requirements.
- Ensure compliance with established internal control procedures by examining records, reports, operating practices, and documentation.
- Maintain internal control systems by developing, preserving and updating audit programs; recommending new/improved policies, procedures, and practices.
- Prepare special audit and control reports by collecting, analyzing and summarizing operating information and trends.
- Perform and manage operational projects and assignments as directed by the Director of Operational Compliance.

**New England Treatment Access
Security Supervisor**

Franklin, MA

December 2016 - April 2017

- Responsible for the day to day security needs for the main cultivation site.
- Created and maintained employee schedules for each site along with addressing coverage needs.
- Maintained a safe and secure environment for staff and visitors in accordance with regulations.
- Secured the facility and personnel by patrolling the premises, monitoring surveillance equipment, inspecting buildings and access points.
- Reviewed and analyzed security-related incident reports, investigating and resolving false alarms, preventing losses and damages by reporting irregularities, and informing violators of policy and procedures.
- Performed and managed all security-related projects, developing safety plans consistent with regulatory, compliance and other requirements.
- Created and implemented training documents and plans for all security staff.

**New England Treatment Access
Security Team Lead**

Franklin, MA

September 2016 - December 2016

- Securing the facility and personnel by patrolling the premises, monitoring surveillance equipment, inspecting buildings and access points.
- Reviewing and analyzing security-related incident reports, investigating and resolving false alarms, preventing losses and damages by reporting irregularities, and informing violators of policy and procedures.
- Ensures consistent monitoring of the electronic surveillance systems.

**New England Treatment Access
Security Specialist**

Franklin, MA

January 2016 - September 2016

- Securing the facility and personnel by patrolling the premises, monitoring surveillance equipment, inspecting buildings and access points.
- Responsible for the day to day security needs for the main cultivation site.
- Escorting visitors and vendors throughout the premises as needed.
- Review and analyze security-related incident reports; investigate and resolve all false alarms.

Certifications:

- OSHA 10 & 30-hour Certificates
- HAZMAT Certified
- Laboratory Safety Certified
- RCRA – Resource Conservation and Recovery Act Certified
- Hazardous Waste Shipping Certified
- Notary Public (Massachusetts valid through Nov 2024)
- ServSafe Certified for Food Safety
- CPR, First Aid, and AED Certified
- METRC Certified
- Employee Relations Training
- Workers Compensation

Skills:

- Microsoft Office
- Interrogative Interviews
- Adobe PDF Suite
- PowerPoint

- Excel Suite
- Google Business (Google Drive, Sheets, Docs, Google Forms)
- Seed-To-Sale Tracking Software (MJ Freeway/LeafLogix)
- Graphic Design
- Avigilon Security Suite and Equipment
- Security Network Troubleshooting (Camera diagnosis and repair/Running and patching new connections)

Education:

Seekonk High School

Seekonk, MA

High School diploma 2008

Bristol Community College

Fall River, MA

Associates Criminal Law 2009 - 2012