

Author's Comments on manuscript ACP-2019-479 "Potential Regional Air Quality Impacts of Cannabis Cultivation Facilities in Denver, Colorado"

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Response to our 2 anonymous reviewers

We thank our reviewers for their comments regarding the importance and timeliness of our study. The reviewers' comments are in *grey italics* and our response is given in black.

Anonymous referee #1:

This manuscript is well written and provides an important initial step toward estimating VOC emissions from a growing industrial sector and demonstrates potential air quality impacts that might be anticipated given some of the range in uncertainty related to quantifying these emissions.

I only have a few minor suggestions/potential revisions.

Section 3.2.1 is rather hard to follow. The paragraph starting at line 351 talks about reductions in pollutants but the levels that follow seem to increase. Also, I found this section a little hard to follow since I am working with the presumption there are no photochemical reactions happening and everything being discussed relates to non- photochemical reactions in the model. Is that correct? I was a little surprised that hydroxyl radical production could increase overnight.

Section 3.2.1: We have modified the text to clarify the PA process. L341-350 now read:

“To better understand why ozone increased at night, the PA model output was analyzed to quantify the chemical and physical processes producing ozone. Plume tracking was used so that only grid cells where the increase in ozone (i.e. the plume) occurred were included in our analysis, which ran from July 27th, 9:00 PM to July 28th, 6:00 AM LST. The number of vertical model layers included in the analysis also varied to incorporate the hourly evolution of the PBL. Figure S4 provides snapshots of the horizontal grid cells used and the vertical layers that were aggregated throughout the simulation time period. Fig. S5 shows the changes in final ozone concentrations (compared to the base case) for the grid cells and vertical layers included in the

analysis, as well as the physical and chemical process rates that account for these changes. Figure S5 shows that the process most responsible for increases in ozone concentrations was chemical production.”

We have also expanded our explanation of the chemistry involved as the reviewer is correct that there is no photochemistry occurring at night in the model. At night, HO₂ radicals are produced from the reactions of VOCs with nitrate radicals (NO₃), OH radicals and O₃. OH radicals are formed when O₃ reacts with alkenes. We have modified the text to clarify this:

“For the chosen vertical layers and grid cells Table 3A shows the total rate of the oxidation reactions with TERP across the entire period. Throughout this time, the additional TERP emissions lead to an increase in the number of oxidation reactions thereby generating more secondary VOC products and radical species. The chemical losses of TERP increased due to reactions with: OH (from 0.01 ppb to 0.1 ppb; +900%), nitrate radical (NO₃) (from 0.39 ppb to 1.58 ppb; +305%), and O₃ (from 0.04 ppb to 0.2 ppb; +400%). Further analysis confirms that night-time oxidation chemistry leading to changes in ozone concentration are driven by NO₃. In the 3_EC scenario, TERP emissions only increased the annual VOC emission in Denver County by 3.5%, but this is sufficient to increase the VOC + NO₃ reaction rates by 125%. These increases produce more peroxy radicals (TRO₂=HO₂ + RO₂) driving further oxidation and further radical production. Table 3B also shows that the generation of OH radicals from reactions of TERP with O₃ increased by 267%. Ultimately, these increases in initial TERP reactions with NO₃ and O₃ increase the NO to NO₂ conversions via the TRO₂ pathway by 44%, reducing the availability of NO to react with O₃. Thus, the increased ozone concentration predicted at night is actually due to the 1 ppb (0.8%) reduction in the loss of ozone to reactions with NO rather than an increase in actual production of ozone (Table 3C). The increased TERP emissions also increase production of NO_x termination products (NO_z) by 27% with organic nitrate (NTR; representing ~71% of this NO_z product) increasing from 0.66 ppb to 1.6 ppb (+142%). This increase in NO_z production at night also results in lower NO concentrations and thus lower ozone titration.”

Section 3.2.3 line 397 discusses the increase in overnight O3 but I am not sure this would really be relevant in a discussion about implications with policy relevance since overnight O3 levels are usually well below the level of the standard.

We agree with the author concerning the policy relevancy. It is important to note that during the vegetative stage (roughly half the growth cycle of *Cannabis spp.*) CCFs are under lights 24-hours per day so nighttime monoterpene emission rates remain similar to those during the day. Thus, these emissions can affect night-time chemistry in a way that is unique for BVOCs, as was shown in our model simulations. We have modified the text to clarify that our goal for this part of the analysis was the scientific interest of their impact on nighttime chemistry.

In the conclusion section, line 402-403 needs a qualification that the emissions is the first inventory for Colorado and not the United States.

To our knowledge this is the first inventory of terpene emissions for the cannabis industry to have been conducted anywhere. Our statement is ambiguous and L402-403 has been amended to read:

“This study provides the first VOC emission inventory to be compiled for the cannabis industry in Colorado, the first time such analysis has been conducted anywhere in the USA.”

Anonymous referee #2:

This manuscript presents a first attempt at compiling state-wide (Colorado) emissions inventory for monoterpenes from cannabis cultivation facilities (CCFs). The new emissions inventory is incorporated into a chemical transport model to evaluate the impact of CCFs on ambient ozone concentrations. The manuscript is well written and the topic is of interest to the ACP research community and the general public, as it is important to know how much CCFs can impact air quality and provide information to decision maker on whether mitigations may be necessary to reduce the impact. Given the interest in the topic, the large gap in data and information, and generally appropriate methodology and analysis, the manuscript is acceptable for publication provided some revisions are made to clarify some points and to not overstate the results.

Because of the large uncertainties in the emissions, the study carried out sensitivity simulations, with emissions spanning a factor of 10, to evaluate the range of potential impacts on ozone. The manuscript states that the study used “realistic bounds on each parameter” for the emissions parameterization, but it does not clearly explain why the factors chosen were considered realistic. For all parameters (EC, DPW, and PC), insufficient justification was provided on why parameter values based on leaf enclosures data of Wang et al., 2018 are considered lower bounds. The statement “. . .plants studied by Wang et al., however, were not grown in the optimized conditions found in a CCF and the reported ECs could be conservative” needs support/citations. Optimal growth conditions are not necessarily correlated with magnitude of monoterpene emissions. Even if one considers EC values of Wang et al., 2018 be to lower bounds, what is the basis to say that a multiple of 10 is realistic?

We thank our reviewer for their constructive comments on our sensitivity simulations. As the reviewer themselves points out, there are considerable uncertainties around all of the factors included in our estimated inventory. Here, we further clarify and justify our parameter choices in response and have modified the manuscript accordingly.

“For all parameters (EC, DPW, and PC), insufficient justification was provided on why parameter values based on leaf enclosure data of Wang et al., 2018 are considered lower bounds.”

The DPW (plant dry weight) is not based on the enclosure measurement study. Instead, these are based on figures from Washington State Liquor and Cannabis Board and from Colorado Department of Revenue who oversee the licensing of Cannabis Cultivation Facilities.

Figure S1 summarises the available (reliable) data on material harvested from CCFs; here from Washington State. We use the yields of wet and dry buds (the marketable material) to deduce the water content in Cannabis buds and then assume that the water content is the same in the remaining plant material. From this we are able to estimate the dry weight of an average *Cannabis spp.* plant as described in the main text in L148-169. We use this mean of ~750 g (N = 18,257) as the base case value for DPW. The standard deviation in this estimate is of similar magnitude and we take the mean +1 s.d. (1500 g) as the value of DPW for our first sensitivity test. Our final value (2500 g) is considerably higher and represents the maximum yield recorded by Washington State Liquor and Cannabis Board. As the total plant count and

reported yields are 3 and 4 higher respectively in Colorado than Washington state (LCB, 2017; Topshelfdata, 2017; Hartman et al., 2018b), we used this maximum on the assumption that *Cannabis spp.* cultivated in CCFs in Colorado in summer season is grown under more optimal conditions than those grown in Washington State resulting in considerably higher yields.

We have clarified this a little further in the main text. L173-177 have been modified to read:

“The average and standard deviation of DPW was 754 g (1-2,260 g) (Fig. S1e). For the development of these emission inventories, a base value of 750 g was assumed for DPW based on the average calculated from the Washington database. As a sensitivity test, a DPW of 1,500 g representing the mean plus one standard deviation range was chosen. Finally, a DPW of 2,500 g, the maximum yield recorded by Washington State Liquor and Cannabis Board, was taken as the upper statistical boundary as shown in Fig. S1e. As the total plant count and reported yields are 3 and 4 factor higher respectively in Colorado than Washington state (LCB, 2017; Topshelfdata, 2017; Hartman et al., 2018b), we took this maximum on the assumption that *Cannabis spp.* cultivated in CCFs in Colorado in summer season is grown under more optimal conditions than those grown in Washington State resulting in considerably higher yields.”

Table S2 shows the maximum number of plants permitted in a CCF for each licence tier in Colorado. This shows that our choice of value for PC is well below the maximum for Tier 1 premises. As explained in the main text (L179-184) our base value of PC is based on the current (June 2018) 1 million “mature” Cannabis plants under cultivation in Denver County, with two sensitivity simulations exploring a doubling in plant numbers (commensurate with continued expansion at the same rate, as explained in the main text in L185-195) and finally, a simulation with each CCF containing the maximum possible number of plants under a Tier 1 licence. These are summarised in Table S1.

We have changed the main text to clarify our parameter values. L179-195 now reads:

“Counts of all plants larger than 8 inches have been recorded by the Colorado DOR on a monthly basis since 2014. As of June 2018, there are a total of 1.06 million plants (Hartman et al., 2018a, b). We therefore used 1 million as the base number for the emission inventory. The DOR data only provides county-level information rather than actual number of plants per CCF. The plants were then distributed equally among the CCFs to calculate an average of 905 plants per facility in Denver County and 521 outside of the county.

Two sensitivity simulations were conducted based on the assumption that the cannabis industry in Colorado will continue to expand at similar rates in the future. From June 2016 to June 2018 the total number of plants recorded by DOR grew from 826,963 to 1,062,765, an annual average increase of 118,000. Assuming this rate of expansion remains constant, there would be 2 million plants in the state of Colorado by 2025 and this value was used in simulation 6_PC. It was assumed in simulation 7_PC that growth would accelerate in the future to the point at which each recreational and medical CCF would contain the maximum number of plants permitted under a Tier 1 license leading to a state-wide total of nearly 4 million plants. The maximum number of plants that can be grown under each licensing tier is shown in supplemental Table S2 (CDOR, 2019). The average plant count per CCF for each PC sensitivity simulation are shown in Table S1.”

The monoterpene emission capacity (EC) was based on the enclosure measurements described by Wang et al., 2018. In this study, emission rates from 4 cultivars were found to vary widely among Cannabis spp. strains and across growth stages. The base value for EC was taken as 10

$\mu\text{g gdw}^{-1} \text{h}^{-1}$ based on the average emissions from Critical Mass at the vegetative growth stage. It has been reported that during the flowering stage the bud tissues contain a significant amount of monoterpenes. Further, the Spokane Regional Clean Air Agency (SRCAA) and Washington State University measured monoterpene concentrations from indoor cannabis facilities in grow rooms (Southwellb et al., 2017). They found concentrations of monoterpenes in grow room with 80 days old plants (1,660 ppb) to be 10 times higher than the 48 days old plants (150 ppb) suggesting that the emission rate from plants in the flowering state is higher than those measured at the vegetative stage. Since no studies in which emission rates of monoterpenes from buds have been reported, we feel that the range proposed is sufficiently wide to provide useful information regarding possible impact of this uncertainty.

We have modified the main text to incorporate these points. L134-147 now read:

“Wang et al. (2018) only sampled during the vegetative stage, and to our knowledge emission rates of monoterpenes from buds or flowers do not exist. It is not known how much EC will change during these different growth stages, but the grey literature does report that CCFs actively select cultivars to maximise the amount of monoterpenes found in the bud tissues. The Spokane Regional Clean Air Agency (SRCAA), in collaboration with Washington State University (Southwellb et al., 2017; Wen et al., 2017), measured monoterpenes in flowering rooms of CCFs in Washington state. They found concentrations of monoterpenes in grow room with 80 days old plants (1,660 ppb) to be >10 times higher than the 48 days old plants (150 ppb). CCFs in Colorado house a wide variety of strains at both vegetative and flowering stages of growth suggesting that the emission rate of monoterpenes from CCFs is higher than that measured from foliage by Wang et al. (2019). Currently, no database exists that can provide the number of plants by strain and growth stage. For the base case, it was assumed that each CCF grew only one strain and that all plants were at the vegetative growth stage resulting in a single and constant EC for each CCF; taken to be $10 \mu\text{g gdw}^{-1} \text{h}^{-1}$ of total monoterpenes based on the reported EC from the Critical Mass cultivar (Wang et al., 2019). Given the uncertainty in EC, the variety of possible plant stages and cultivars, the EC used in simulation 1_EC was multiplied by a factor of 5 and 10 in simulations 2_EC and 3_EC as a sensitivity analysis.”

Even in the sensitivity case with a factor of 10 increase in emissions, the impact of increased monoterpenes associated with CCF is less than 0.5 ppb in hourly ozone during the daytime and only ~ 0.14 for maximum daily average 8-hour (MDA8) ozone. This is unsurprising because the percent increase in VOC emissions is only 3.5% for Denver County for the sensitive case that has 10x the base-case CCF emissions (1_EC). Figure 10's axis going up to 4000 ton/year is hardly meaningful as 1000 ton/year increase in Denver is nearly 30 times the base-case CCF emissions, and even then the increase is only 0.38 ppb in MDA8 ozone. Thus, “further data are urgently required regarding CCF-specific information on plant counts. . .” is overstating the urgency of needing to improve quantification of CCF terpene emissions with respect to ambient ozone.

We agree with the reviewer and have changed the language.

The statement now reads

“Further data are needed to reduce uncertainties in emission inventory estimates specifically those regarding CCF-specific information on plant counts, ...”

There are 7 sensitivity simulations listed, but in reality there are only 6 sensitivity cases because simulation 6_PC is the same as simulation 4_DPW. Because the values of EC, DPW, and PC are assumed to be constants, the emission increase is uniform across the simulation domain such that: 2_EC = 5 x 1_EC, 3_EC = 10 x 1_EC, 4_DPW = 6_PC = 2 x 1_EC, 5_DPW = 3.33 x 1_EC, 7_PC = 4 x 1_EC. Really only 3 sensitive simulations (2x, 5x, and 10 x 1_EC) was needed to cover the emissions range explored by the 7 sensitivities simulations.

Although the reviewer is correct that the 6_PC and 4_DPW sensitivity tests are effectively the same, the conception of these two scenarios were different. The 4_DPW emission assumed a heavier dry biomass, and 6_PC is for a future plant count estimate. In addition, the 5_DPW and 7_PC represent the upper bounds of DPW and PC showing their relative impacts on the inventory. Assessing the contribution of the individual factors on our emission inventory of, we concluded that it is the emission capacity (EC) of *cannabis spp.* that is the most significant and also the most uncertain.

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1 **Potential Regional Air Quality Impacts of Cannabis Cultivation Facilities in** 2 **Denver, Colorado**

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13 **Abstract**

14 The legal commercialization of cannabis for recreational and medical use has
15 effectively created a new and almost unregulated cultivation industry. In 2018, within the
16 Denver County limits, there were more than 600 registered cannabis cultivation facilities
17 (CCFs) for recreational and medical use, mostly housed in commercial warehouses.
18 Measurements have found concentrations of highly reactive terpenes from the headspace above
19 cannabis plants that, when released in the atmosphere, could impact air quality. Here we
20 developed the first emission inventory for cannabis emissions of terpenes. The range of
21 possible emissions from these facilities was 66-657 metric tons/year of terpenes across the state
22 of Colorado; half of the emissions are from Denver County. Our estimates are based on the
23 best available information and highlight the critical data gaps needed to reduce uncertainties.
24 These realizations of inventories were then used with a regulatory air quality model, developed
25 by the State of Colorado to predict regional ozone impacts. It was found that most of the
26 predicted changes occur in the vicinity of CCFs concentrated in Denver. An increase of 362
27 metric tons/year of terpene emissions in Denver County resulted in increases of up to 0.34 ppb
28 in hourly ozone concentrations during the morning and 0.67 ppb at night. Model predictions
29 indicate that in Denver County every 1,000 metric tons/year increase of terpenes results in 1
30 ppb increase in daytime hourly ozone concentrations and a maximum daily 8-hour average
31 (MDA8) increase of 0.3 ppb. The emission inventories developed here are highly uncertain,
32 but highlight the need for more detailed cannabis and CCFs data to fully understand the

33 possible impacts of this new industry on regional air quality.

34 **Keywords:** *Cannabis spp.*; emission inventory; biogenic volatile organic compound; terpene;
35 particulate matter; ozone; air quality

36 **1. Introduction**

37 The rapid expansion of one of the United States' newest industries, the commercial
38 production and sale of recreational cannabis, was recently likened to the millennial "dot com"
39 boom (Borchardt, 2017). With an increasing number of states passing bills to legalize
40 recreational cannabis, the enterprise is set to rival all but the largest of current businesses. The
41 cultivation, sale, and consumption of recreational cannabis annual sales revenues had reached
42 \$1.5 billion in the US state of Colorado by 2017 (CDOR, 2018b), exceeding revenues
43 generated by grain farming in the state. The commercial cultivation and sale of cannabis is not
44 subject to the same strict environmental monitoring and reporting procedures as other
45 industries of similar size. While the relaxation of laws has provided certain medicinal and
46 economic opportunities for the states involved, the potentially significant environmental
47 impact on air quality due to the production of cannabis has largely been ignored.

48 Previous research on the wider impacts of cannabis production has been limited due to
49 its federal status as an illegal or controlled substance (Crick et al., 2013; Eisenstein, 2015;
50 Andreae et al., 2016; Stith and Vigil, 2016). As a result of this status, most studies have focused
51 on the pharmacological and health effects of the psychoactive constituents of *Cannabis spp.*
52 (Ashton, 2001; Borgelt et al., 2013; WHO, 2016), or the societal impacts associated with the
53 illicit nature of the industry (IDCP, 1995; Sznitman and Zolotov, 2015; WHO, 2016). The few
54 assessments to date on the environmental impacts of the production of *Cannabis spp.* have
55 centered on the detrimental effects of outdoor cultivation on ecosystems and watersheds due
56 to land clearance and high water demand (Bauer et al., 2015; Carah et al., 2015; Butsic and
57 Brenner, 2016). Studies have also quantified the energy consumption of the industry and the
58 resulting greenhouse gas emissions associated with indoor cultivation (Mills, 2012). Little
59 attention has been paid to the possible biogenic volatile organic compounds (BVOCs) emitted
60 from the growing of cannabis and its impact on indoor and outdoor air quality.

61 The only studies that have measured the composition of gaseous emissions from
62 cannabis have been limited to headspace samples above the plants (Hood et al., 1973; Turner
63 et al., 1980; Martyny et al., 2013). These studies have shown high concentrations of VOCs

64 such as monoterpenes ($C_{10}H_{16}$), sesquiterpenes ($C_{15}H_{24}$), and cannabinoids. These studies also
65 measured thiols, a sulfur-containing compound responsible for the characteristic odor of
66 *Cannabis spp.* (Rice and Koziel, 2015b, a). The principle (trace) components are reported to
67 be: α - and β -pinene, β -myrcene, d-limonene, cis-ocimene, β -caryophyllene, β -farnesene and α -
68 humulene (Hood et al., 1973; Turner et al., 1980; Hillig, 2004; Fishedick et al., 2010; Martyny
69 et al., 2013; Marchini et al., 2014; Rice and Koziel, 2015b). The precise mix of chemical
70 species, however, was strongly dependent on strain and the growing conditions (Fishedick et
71 al., 2010). It should be noted that the pharmacologically active ingredients, e.g.,
72 Tetrahydrocannabinol (Δ^9 -THC), generally have low volatility and therefore are rarely
73 detected in the gas-phase (Martyny et al., 2013). Measurements in (illicit) CCFs in conjunction
74 with law enforcement raids in Colorado in 2012 found VOC concentrations of terpenes to be
75 50-100 ppb within growing rooms (Martyny et al., 2013). In these cases, the CCF operation
76 contained fewer than 100 plants, compared with the thousands of plants found in currently
77 licensed premises (CDOR, 2018a). Further, the Spokane Regional Clean Air Agency (SRCAA)
78 study in Washington state measured indoor VOCs in seven flowering rooms and two dry bud
79 rooms across four different CCFs. The average terpene concentration was 361 ppb (27-1,676
80 ppb) in those facilities (Southwellb et al., 2017). These indoor measurements indicate the
81 presence of BVOCs, but only limited studies have actually determined the chemical profile of
82 gases actually emitted by the growing plants. For comparison, summertime outdoor
83 monoterpene concentrations in forested regions of Colorado are typically less than 4 ppb
84 (Ortega et al., 2014).

85 Terpenoids, such as monoterpenes ($C_{10}H_{16}$) and sesquiterpenes ($C_{15}H_{24}$), are highly
86 reactive compounds with atmospheric lifetimes ranging from seconds to hours (Fuentes et al.,
87 2000; Seinfeld and Pandis, 2006). They are primarily biogenic in origin (Fuentes et al., 2000;
88 Guenther et al., 2012) and their reactions alter the atmospheric oxidizing capacity, resulting in
89 a range of low volatility products that can partition into the aerosol phase and, depending on
90 the concentration of nitrogen oxides (NO_x), lead to the formation of ozone (Laothawornkitkul
91 et al., 2009; Guenther et al., 2012). Both ozone and aerosols are climate-relevant components
92 of the atmosphere as well as criteria air pollutants (USEPA, 2016).

93 In Colorado, the commercial growing of *Cannabis spp.* is restricted to secure and
94 locked premises, resulting in indoor operations in most counties (CDOR, 2018a). Since
95 legalization, the number of cannabis cultivation facilities (CCFs) has risen to 1,400 across the
96 state of Colorado in 2018, including more than 233 registered recreational and 375 medical

97 CCFs within the Denver city limits alone. In Denver, the CCFs are commonly housed in
98 commercial warehouses and the majority of these are located near transport links such as train
99 hubs and major interstate highways (CDOR, 2019; Mills, 2012). Denver and the Front Range
100 area are currently classified as “moderate” nonattainment of the ozone standard (USEPA,
101 2017). Due to that status, a federally mandated State Implementation Plan (SIP) was developed
102 and mutually agreed upon between the state of Colorado and the United States Environmental
103 Protection Agency (EPA) (CDPHE, 2009). Under the terms of the SIP, Colorado Air Quality
104 Control Commission (AQCC) developed regulatory models to predict reductions in ozone
105 precursors (CDPHE, 2009). These studies have found that ozone concentrations in Denver are
106 VOC-sensitive, meaning that an increase in VOC concentrations will increase ozone
107 production (UNC-IE and ENVIRON, 2013). The location of CCFs in a VOC sensitive region
108 in Denver suggests a potential emission source that may impact regional air quality (UNC-IE
109 and ENVIRON, 2014). This work used the best available information to produce the first
110 emission inventory of VOCs from CCFs in Colorado. Colorado’s regulatory model was then
111 used to determine the extent that these emissions could impact regional air quality.

112 2. Materials and Methods

113 2.1 Emission Rate calculation

114 Figure 1a shows the locations of the licensed 739 recreational and 733 medical CCFs
115 in Colorado as of March 2018 (CDOR, 2018a). Eq. (1) was first used to estimate an emission
116 rate for each CCF, and then all CCFs were used to build a bottom-up BVOC emission inventory.

$$117 \quad ER_i = \sum_j EC_{ij} \times DPW_{ij} \times PC_{ij} \quad (1)$$

118 Where, ER_i ($\mu\text{g h}^{-1}$) is the total emissions rate for CCF i based on the sum of emission
119 rates for all j cannabis strains; EC_{ij} is the emission capacity ($\mu\text{g dwg}^{-1} \text{h}^{-1}$) for cannabis strain j
120 in facility i , DPW_{ij} is the dry plant weight per plant (g) for cannabis strain j , and PC is the plant
121 count number for strain j in facility i .

122 Since state legalization only occurred in 2014, and given the current federal illicit status
123 of *Cannabis spp.*, there is a lack of available data for the three parameters used in Eq. (1). The
124 following describes the assumptions made for a range of potential values of EC , DPW , and PC
125 given the best information available.

126 2.1.1 Emission Capacity (EC)

127 The only data of EC from a leaf enclosure measurement are of three strains namely:
128 Critical Mass, Lemon Wheel and Rockstar Kush, that were 45 days old (Wang et al., 2018).
129 This study found that at this growth stage the EC for total monoterpenes varied among strains:
130 $10 \mu\text{g gdw}^{-1} \text{h}^{-1}$ for Critical Mass, $7 \mu\text{g gdw}^{-1} \text{h}^{-1}$ for Lemon Wheel, and $6 \mu\text{g gdw}^{-1} \text{h}^{-1}$ for
131 Rockstar Kush. The Department of Revenue (DOR) in Colorado has classified *Cannabis spp.*
132 in a CCF into four different growth stages: immature (0-24 days old), vegetative (25-79 days
133 old), flowering (80-132 days old), and at harvest (132-140 days old) (Hartman et al., 2018b).
134 Wang et al. (2018) only sampled during the vegetative stage, and to our knowledge emission
135 rates of monoterpenes from buds or flowers do not exist. It is not known how much EC will
136 change during these different growth stages, but the grey literature does report that CCFs
137 actively select cultivars to maximise the amount of monoterpenes found in the bud tissues.

138 The Spokane Regional Clean Air Agency (SRCAA), in collaboration with Washington
139 State University (Southwellb et al., 2017; Wen et al., 2017), measured monoterpenes in
140 flowering rooms of CCFs in Washington state. They found concentrations of monoterpenes in
141 grow room with 80 days old plants (1,660 ppb) to be >10 times higher than the 48 days old
142 plants (150 ppb). CCFs in Colorado house a wide variety of strains at both vegetative and

143 flowering stages of growth suggesting that the emission rate of monoterpenes from CCFs is
144 higher than that measured from foliage by Wang et al. (2019). Currently, no database exists
145 that can provide the number of plants by strain and growth stage. For the base case, it was
146 assumed that each CCF grew only one strain and that all plants were at the vegetative growth
147 stage resulting in a single and constant EC for each CCF; taken to be $10 \mu\text{g gdw}^{-1} \text{h}^{-1}$ of total
148 monoterpenes based on the reported EC from the Critical Mass cultivar (Wang et al., 2019).
149 Given the uncertainty in EC, the variety of possible plant stages and cultivars, the EC used in
150 simulation 1_EC was multiplied by a factor of 5 and 10 in simulations 2_EC and 3_EC as a
151 sensitivity analysis.

152 2.1.2 Dry Plant Weight (DPW)

153 No published studies report the *DPW* of a *Cannabis spp.* plant. Both the states of
154 Colorado (METRC, 2018) and Washington (LCB, 2017; Topshelfdata, 2017) track the mass
155 of the commercially sold portion of the plant, the “dry bud.” The Colorado database, however,
156 is not publicly accessible and was not available for this study. In Washington, using data from
157 all type of facilities (outdoor and indoor) from August–October 2017, it was found that the
158 average dry bud mass per plant was 210 g (0-586 g) shown in Fig. S1a. The Washington
159 database also includes the “wet bud” weight defined as the mass of the bud after it was just
160 harvested (Fig. S1b), but prior to the 7-10 day drying process. The total waste weight, or the
161 remaining mass of the plant after the buds have been harvested, is also recorded. As shown in
162 Eq. (2), the sum of these two masses should equal the total mass of the wet plant.

$$163 \quad M_{\text{wet plant}} = M_{\text{wet buds}} + M_{\text{waste}} \quad (2)$$

164 Where, $M_{\text{wet plant}}$ is the mass of the entire wet plant (g), and $M_{\text{wet bud}}$ is the mass of the
165 wet bud (g), and $M_{\text{wet waste}}$ is the mass of the waste (g).

166 Data from August-October of 2017 were used with Eq. (2), to estimate the wet plant
167 weight resulting in an average of 3,770 g (6-13,405 g) shown in Fig. S1c. The large range in
168 mass is due to the different growing conditions found in CCFs, and the type of strain being
169 grown. The ratio of the wet and dry bud mass data from Washington was used as a surrogate
170 to determine the percentage of water found in the total plant material as shown in Eq. (3).

$$171 \quad R_{D/W} = M_{\text{dry bud}} / M_{\text{wet bud}} \quad (3)$$

172 Where, $R_{D/W}$ is the ratio of the masses of the dry to wet bud, and $M_{\text{dry bud}}$ (g) is the
173 mass of the harvested buds after 7-10 days of drying (Fig. S1d).

174 It was assumed that the same factor could be applied to the total wet plant weight to
175 estimate the *DPW* as shown in Eq. (4).

$$176 \quad DPW = M_{wet\ plant} \times R_{D/W} \quad (4)$$

177 The average of DPW was 754 g (1-2,260 g). For the development of these emission
178 inventories, a base value of 750 g was assumed for DPW based on the average calculated from
179 the Washington database. As a sensitivity test, a DPW of 1,500 g representing the mean plus
180 one standard deviation range was chosen. Finally, a DPW of 2,500 g, the maximum yield
181 recorded by Washington State Liquor and Cannabis Board, was taken as the upper statistical
182 boundary as shown in Fig. S1e. As the total plant count and reported yields are 3 and 4 factor
183 higher respectively in Colorado than Washington state (LCB, 2017; Topshelfdata, 2017;
184 Hartman et al., 2018b), we took this maximum on the assumption that *Cannabis spp.* cultivated
185 in CCFs in Colorado in summer season is grown under more optimal conditions than those
186 grown in Washington State resulting in considerably higher yields.

187 **2.1.3 Plant Count (PC)**

188 Counts of all plants larger than 8 inches have been recorded by the Colorado DOR on
189 a monthly basis since 2014. As of June 2018, there are a total of 1.06 million plants (Hartman
190 et al., 2018a, b). We therefore used 1 million as the base number for the emission inventory.
191 The DOR data only provides county-level information rather than actual number of plants per
192 CCF. The plants were then distributed equally among the CCFs to calculate an average of 905
193 plants per facility in Denver County and 521 outside of the county.

194 Two sensitivity simulations were conducted based on the assumption that the cannabis
195 industry in Colorado will continue to expand at similar rates in the future. From June 2016 to
196 June 2018 the total number of plants recorded by DOR grew from 826,963 to 1,062,765, an
197 annual average increase of 118,000. Assuming this rate of expansion remains constant, there
198 would be 2 million plants in the state of Colorado by 2025 and this value was used in simulation
199 6_PC. It was assumed in simulation 7_PC that growth would accelerate in the future to the
200 point at which each recreational and medical CCF would contain the maximum number of
201 plants permitted under a Tier 1 license leading to a state-wide total of nearly 4 million plants.
202 The maximum number of plants that can be grown under each licensing tier is shown in
203 supplemental Table S2 (CDOR, 2019). The average plant count per CCF for each PC
204 sensitivity simulation are shown in Table S1.

205 **2.2 Emission Inventories for Cannabis Cultivation Facilities (CCF)**

206 Given the large gaps in knowledge, this study will focus only on variabilities in *EC*,
207 *DPW*, and *PC* and will hold other parameters constant. For example, to maximize growing
208 conditions relative humidity, temperatures, CO₂ concentrations, and fertilizer usage are all
209 optimized and vary widely by CCF. Further, this study did not consider other processes such
210 as trimming, harvesting and drying buds which may also release BVOCs.

211 For this study, it was assumed that all CCFs operated in the same way at a temperature
212 of 30°C and 1000 μmol m⁻² s⁻¹ of photosynthetically active radiation (PAR). In addition, it was
213 assumed that all emissions from the plants inside a CCF enter the atmosphere. Ventilation to
214 the atmosphere varies widely by the operation, and there are no current regulations or industry-
215 wide practices that are being used to mitigate emissions.

216 In total, seven scenarios of emission inventories were created to explore sensitivities in
217 *EC*, *DPW*, and *PC* as shown in Table 1. In scenarios 1-3, the *PC* was held to a total of 1 million
218 and a 750 g *DPW* was assumed. The *EC* of 10 μg gdw⁻¹ h⁻¹ as reported by Wang et al. (2018)
219 was used in 1_*EC*, with a sensitivity that multiplied that rate by a factor of 5 (scenario 2_*EC*),
220 and 10 (scenario 3_*EC*). The remaining scenarios in Table 1 kept the *EC* constant at 10 μg
221 gdw⁻¹ h⁻¹. Scenarios 4_*DPW* and 5_*DPW* explored the sensitivity of increasing *DPW*, and
222 scenarios 6_*PC* and 7_*PC* increased the total plant count.

223 **2.3 Model description and analysis tools**

224 **2.3.1 Model protocols and evaluation**

225 The Comprehensive Air Quality Model with Extensions, CAMx6.10 (ENVIRON,
226 2013; ENVIRON and Alpine., 2017b), was used to predict ground-level ozone concentrations.
227 The model and protocols used in this study are based on the Western Air Quality Modeling
228 Study (WAQS) for 2011 (ENVIRON and Alpine., 2017b; Adelman et al., 2016). The WAQS
229 2011b baseline model simulation period runs from June 15th to September 15th, 2011, and is
230 driven with meteorological data from WRF version 3.3 for the same time period and domain.
231 The model was initialized using Three-State Air Quality Modeling Study standard boundary
232 and initial conditions (ENVIRON and Alpine., 2017b). The model domain is a 2-way nested
233 grid at 12 and 4 km grid cell resolutions (Fig. 1b). Anthropogenic emissions were derived from
234 EPA National Emission Inventory (NEI) version 2011 NEIv2 with updates for point and area
235 sources of oil and gas emissions in the western US. The biogenic emissions inventory was
236 based on the Model of Emissions of Gases and Aerosols from Nature version 2.1
237 (MEGANv2.1) (Guenther et al., 2012). All data and supporting documentation are publicly

238 available via the Intermountain West Data Warehouse (IWDW) website (WAQS, 2017).

239 The revision 2 of Carbon Bond 6 (CB6r2) (Ruiz and Yarwood, 2013) chemistry
240 mechanism was used in all model runs. This groups all monoterpenes as a single compound
241 species, TERP. Thus, the total monoterpenes EC reported in Wang et al. (2018) was converted
242 into the TERP species. TERP undergoes oxidation reactions with the nitrate radical (NO₃), the
243 hydroxyl radical (OH), ozone (O₃), and singlet oxygen. It should be noted that the TERP
244 category includes a wide variety of monoterpenes whose reaction rate constants may differ
245 from TERP ($k_{298} = 6.77 \times 10^{-11}$ molecules cm⁻³ s⁻¹). For example, the rate constant of β-myrcene
246 with OH radical (Hites and Turner, 2009) is 3.35×10^{-10} molecules cm⁻³ s⁻¹ (k_{298}), which is 4
247 time higher than TERP and 5.6 times faster than α-pinene (Carter, 2010).

248 The details of the WAQS model setup protocol (ENVIRON and Alpine., 2017b) and
249 model performance (Adelman et al., 2016) can be found in IWDW website. In summary, the
250 model performance evaluation concluded that this simulation had met all performance goals
251 for both maximum daily 1-hour (MDA1) and maximum daily 8-hour average (MDA8) ozone.
252 In the performance review report, it was found that the WAQS model had a positive bias for
253 ozone simulated in a 4 km × 4 km resolution domain, when compared with EPA Air Quality
254 System (AQS) surface monitors (MDA1: 0.8%, MDA8: 0.9%). On days when ozone
255 concentrations higher than 60 ppb were measured, the model had a negative bias of -6.2% for
256 MDA1 and -6.3% for MDA8. The model evaluation result also noted that the model
257 performance was best during the spring and summer months.

258 **2.3.2 Process Analysis**

259 CAMx runs used in this analysis had the process analysis (PA) option enabled
260 (ENVIRON, 2013). The CAMx configuration used here produces two additional files needed
261 for PA: the integrated reaction rate (IRR) and integrated process rate (IPR). These files include
262 the rates of change in concentration of every species due to chemistry and transport for every
263 grid cell and timestep. Python-based Process Analysis (pyPA) and the Python Environment for
264 Reaction Mechanisms/Mathematics (PERMM) (Henderson et al., 2010; Henderson et al.,
265 2011) were then applied to post-processing the CAMx PA output. PERMM was used to
266 aggregate the chemical and physical process rates for selected model grid cells and layers
267 allowing for tracking of plumes within the planetary boundary layer (PBL).

268 3. Results

269 3.1 Emissions Inventory

270 The seven scenarios were used to estimate a range of emissions of BVOCs from CCFs
271 for the entire state of Colorado. As shown in Table 2, the base case (BC) scenario estimates
272 731,442 ton/year of all VOCs being emitted in Colorado, of which 47% are BVOCs. The BC
273 scenario does not include any emissions from the cannabis industry. Table 2 also shows the
274 seven scenarios that did include CCF emissions ranked in order of their increases in state-wide
275 BVOC emissions. As expected the CCF BVOC emissions scaled linearly with each factor that
276 was changed in Eq. (1). In scenario 3_EC, a 10-fold increase in the emission rate ($100 \mu\text{g gdw}^{-1}$
277 h^{-1}) resulted in a 657 metric tons/year increase. Similarly, scenario 2_EC assumes $50 \mu\text{g gdw}^{-1}$
278 h^{-1} and produces 329 metric tons/year. Scenarios 4 and 5 showed the sensitivity of terpene
279 emissions from CCFs to variation in *DPW* while holding *PC* constant and an *EC* of $10 \mu\text{g gdw}^{-1}$
280 h^{-1} . It was estimated that an additional 66 ton/year of emissions were produced when a 750 g
281 *DPW* is assumed. This doubles to 131 metric tons/year with a *DPW* of 1500 g and reaches 219
282 metric tons/year with a *DPW* of 2500 g. Comparing scenario 1_EC with scenario 6 and 7 shows
283 how the growth in *PC* will impact emissions of BVOCs. In Colorado, a doubling of the *PC*
284 increases BVOC emissions by 131 metric tons/year in scenario 6_PC and 261 metric tons/year
285 for the 4 million plants in scenario 7_PC. The largest increases in BVOC emissions were
286 predicted in scenarios 3_EC and 2_EC showing that the total emission rate of BVOCs from
287 CCFs were most sensitive to *EC*.

288 In March 2018, Denver County housed 41% of CCFs and 55% of all cannabis plants in
289 Colorado (Hartman et al., 2018a). As a result, about 43% of state-wide CCF BVOC emissions
290 occur there (Table 2). Current emission inventories of Denver County show negligible amounts
291 of biogenic emissions accounting for only 0.1% of the total state-wide BVOC emissions. CCF
292 emissions increased BVOC emission rates in Denver Country up to 136% in scenario 3_EC.
293 This changes the total VOC emission rate in Denver County by up to 3.5%. Other cities in
294 Colorado do not have as high a concentration of CCFs, and thus the relative increases were
295 smaller as shown in Table 2.

296 The introduction of additional cannabis BVOC emissions into model simulations
297 increased the predicted TERP concentrations. Figure 2 shows the maximum increase in TERP
298 concentrations for three scenarios for Denver County over the entire 90-day simulation period.
299 Regardless of the scenario, the largest increases in TERP occurred near the largest

300 concentrations of CCFs. The absolute maximum changes ranged from 0.5-5.0 ppb located at
301 the Elyria Swansea and Globeville neighborhoods in north-central Denver. Increases in TERP
302 were also predicted to the north due to the dominant wind flows in that direction throughout
303 the simulation period. Figure S2 shows the maximum increase in TERP concentrations for the
304 1_EC, 5_DPW, and 3_EC scenarios in the 4 km × 4 km domain for the entire 90-day simulation
305 period. As expected substantially lower increases in TERP concentrations were predicted for
306 other cities in Colorado: 0.26 ppb in Colorado Springs and 0.24 ppb in Pueblo. Figure 3 shows
307 the hourly changes in TERP concentrations across the entire 4 km × 4 km domain. The largest
308 increases for all scenarios occurred at night with a peak of 5 ppb at 4:00 AM local standard
309 time (LST). Given that the hourly emissions of terpenes from CCFs were assumed constant for
310 24 hours, these larger nighttime changes can be primarily ascribed to the lack of
311 photochemistry and a shallow nocturnal PBL. These results suggest that the increases of TERP
312 are highly correlated with locations of CCFs, accumulate at night, and have significant losses
313 during the day.

314 **3.2 Regional Ozone impacts**

315 Predicted increases in hourly ozone concentrations in excess of 0.1 ppb only occurred
316 when terpene emissions were in excess of 219 metric tons per year, with scenarios 4_DPW,
317 6_PC, and 1_EC having little impact on predicted ozone. Thus, this analysis will focus on two
318 scenarios, 5_DPW, and 3_EC to explore potential regional ozone impacts in the present and
319 future. Figure 4 shows the hourly changes in ozone concentrations across the entire 4 km × 4
320 km domain for these two scenarios. During the daytime, the increase in TERP emissions results
321 in a peak ozone increase of 0.34 ppb at 9:00 AM LST for 3_EC with only minimal changes in
322 5_DPW. Figure 5 shows, for Denver County and the Front Range Metropolitan Area, the
323 locations of the daytime (6:00 AM – 6:00 PM LST) maximum increases in hourly ozone
324 concentrations for all 90 days when emissions were added for scenarios 5_DPW and 3_EC.
325 Ozone increases for the entire 4 km × 4 km domain can be found in Fig. S3. The largest
326 predicted ozone concentrations occurred in Denver County with impacts of 0.11 ppb in
327 5_DPW, and 0.34 ppb in 3_EC as shown in Fig. 5. Both scenarios show that daytime increases
328 in ozone were limited to Denver County and just to the northwest, west, and southwest of
329 Denver County.

330 There were also night time variations in ozone observed for the modeling domain. In
331 scenario 5_DPW and 3_EC, nighttime increases were more than double the increases predicted

332 during the day. The largest changes in hourly ozone concentrations of 0.67 ppb occurred at
333 0:00 AM LST (i.e. midnight) for 3_EC. Figure 6 shows the location and magnitude of the
334 maximum changes in hourly ozone concentrations during the night (6:00 PM – 6:00 AM LST)
335 in 5_DPW and 3_EC. The extent of ozone increases at night are primarily to the north of
336 Denver indicating a northern outflow. The maximum increase in hourly ozone for the whole of
337 Colorado is shown in Fig. S3, with visibly little changes at night in other cities. These model
338 results suggest that the additional emissions of TERP have immediate impacts on local ozone
339 production chemistry during both the day and night, but little wider impact.

340 A critical metric for the attainment of the NAAQS ozone standard in Denver County is
341 the maximum daily average 8-hour ozone concentration (MDA8). Figure 7 shows the
342 maximum difference in MDA8 for each grid cell centered on Denver County, across the entire
343 90-day simulation period for the 5_DPW, and 3_EC scenarios. Maximum increases in MDA8
344 are 0.14 ppb for 3_EC (Fig. 7b) co-located with the maximum increases in TERP
345 concentrations.

346 **3.2.1 Ozone impact at night**

347 The maximum hourly ozone increase of 0.67 ppb for the 3_EC scenario occurred on
348 Thursday, July 28th, 2011, at 0:00 AM LST (i.e. midnight) near the largest concentration of
349 CCFs (see Fig. 8). In subsequent hours the plume of ozone moved slowly to the east before
350 being dispersed by the rise of the morning PBL at 6:00 AM LST.

351 To better understand why ozone increased at night, the PA model output was analyzed
352 to quantify the chemical and physical processes producing ozone. Plume tracking was used so
353 that only grid cells where the increase in ozone (i.e. the plume) occurred were included in our
354 analysis, which ran from July 27th, 9:00 PM to July 28th, 6:00 AM LST. The number of vertical
355 model layers included in the analysis also varied to incorporate the hourly evolution of the PBL.
356 Figure S4 provides snapshots of the horizontal grid cells used and the vertical layers that were
357 aggregated throughout the simulation time period. Fig. S5 shows the changes in final ozone
358 concentrations (compared to the base case) for the grid cells and vertical layers included in the
359 analysis, as well as the physical and chemical process rates that account for these changes.
360 Figure S5 shows that the process most responsible for increases in ozone concentrations was
361 chemical production.

362 For the chosen vertical layers and grid cells Table 3a shows the total rate of the
363 oxidation reactions with TERP across the entire period. Throughout this time, the additional

364 TERP emissions lead to an increase in the number of oxidation reactions thereby generating
365 more secondary VOC products and radical species. The chemical losses of TERP increased
366 due to reactions with: OH (from 0.01 ppb to 0.1 ppb; +900%), nitrate radical (NO₃) (from 0.39
367 ppb to 1.58 ppb; +305%), and O₃ (from 0.04 ppb to 0.2 ppb; +400%). Further analysis confirms
368 that night-time oxidation chemistry leading to changes in ozone concentration are driven by
369 NO₃. In the 3_EC scenario, TERP emissions only increased the annual VOC emission in
370 Denver County by 3.5%, but this is sufficient to increase the VOC + NO₃ reaction rates by
371 125%. These increases produce more peroxy radicals (TRO₂=HO₂ + RO₂) driving further
372 oxidation and further radical production. Table 3b also shows that the generation of OH
373 radicals from reactions of TERP with O₃ increased by 267%. Ultimately, these increases in
374 initial TERP reactions with NO₃ and O₃ increase the NO to NO₂ conversions via the TRO₂
375 pathway by 44%, reducing the availability of NO to react with O₃. Thus, the increased ozone
376 concentration predicted at night is actually due to the 1 ppb (0.8%) reduction in the loss of
377 ozone to reactions with NO rather than an increase in actual production of ozone (Table 3c).
378 The increased TERP emissions also increase production of NO_x termination products (NO_z) by
379 27% with organic nitrate (NTR; representing ~71% of this NO_z product) increasing from 0.66
380 ppb to 1.6 ppb (+142%). This increase in NO_z production at night also results in lower NO
381 concentrations and thus lower ozone titration.

382 **3.2.2 Ozone impact during the day**

383 The maximum daytime hourly ozone increase of 0.34 ppb occurred at 9:00 AM on
384 Monday, July 18th, 2011, as shown in Fig. 9. On this day, the meteorological conditions
385 favoured the maximum possible production of ozone. This day featured “upslope flows” that
386 are a common meteorological condition linked to ozone exceedances periods (Pfister et al.,
387 2017). We thus chose to focus on July 18th to understand the daytime changes in chemistry that
388 occur from increased BVOC emissions. As expected, the location of predicted ozone increases
389 coincides with the location of the strongest terpene emissions in the domain as shown in Fig.
390 9a. For the daytime hours of 6:00 AM – 2:00 PM LST, the PA option was used to quantify
391 changes in chemical processes for the grid cells and model layers shown in Fig. S6. For these
392 grid cells and layers, Fig. S7 shows the changes in final ozone concentrations compared to the
393 base case and the physical and chemical process rates that impact those concentrations. Table
394 S3 sums the key chemical processes for these hours. The increases in CCF emissions resulted
395 in a 100% increase in OH reactions with TERP producing intermediate oxidation products and
396 ultimately increasing OH production by 0.6%. As a result of this oxidation chemistry, there
397 was an increase of 0.9% in NO to NO₂ conversion by TRO₂ pathway, ultimately leading to a

398 0.1% increase in ozone production.

399 **3.2.3 Ozone impact sensitivity**

400 The maximum modelled daytime hourly ozone increase due to additional CCF
401 emissions occurred on July 18th. Using this day multiple sensitivity simulations were
402 performed, where CCF emissions from Denver County were incrementally increased up to
403 3,800 ton/year. Figure 10 shows the increase in terpene emissions from Denver County versus
404 the largest daily increase in hourly ozone concentrations. Figure 10a shows a linear relationship,
405 indicative of a VOC limited environment, where hourly ozone concentrations are predicted to
406 increase by 1 ppb for every 1,000 ton/year increase in TERP emissions during the day, and
407 0.85 ppb at night. Also shown is the sensitivity to the MDA8 ozone where there is a 0.30 ppb
408 increase for every 1,000 ton/year of TERP emissions. According to projected emission
409 inventories provided by the state of Colorado, the ozone non-attainment area was expected to
410 see reductions of 26.4% of NO_x and 24.6% of VOC emissions by the year 2017 (ENVIRON
411 and Alpine., 2017a). Under these reduced anthropogenic emission scenarios, Fig. 10b shows
412 how ozone would then respond to additional CCF TERP emissions. Figure 10b continues to
413 show a linear relationship, where hourly ozone concentrations are predicted to increase by 1.5
414 ppb for every 1,000 ton/year increase in TERP emissions during the day, and 1.8 ppb at night.
415 In the future case, the MDA8 ozone increases by 0.38 ppb increase for every 1,000 ton/year of
416 TERP emissions. Therefore, Denver will still be VOC-limited and ozone is predicted to more
417 sensitive to CCF emissions of terpenes.

418 **4. Conclusion**

419 This study provides the first VOC emission inventory to be compiled for the cannabis
420 industry in Colorado, the first time such analysis has been conducted anywhere in the USA.

421 Given the current state of knowledge of emission rates and growing practices, there are
422 considerable uncertainties in the basic parameters required to build such an inventory. Using
423 realistic bounds on each parameter, we developed seven scenarios, which resulted in estimated
424 emission rates that ranged over an order of magnitude. The highest emissions occur in Denver
425 County, with rates ranging between 36-362 metric tons/year for the different scenarios, from a
426 total of 66-652 metric tons/year across Colorado as a whole.

427 We included these additional terpene emissions in the Comprehensive Air Quality
428 Model with Extensions (CAMx), the model used by the state of Colorado for regulatory
429 monitoring and projections. Taking the worst case (3_EC) and median scenario (5_DPW) we
430 consider representative of current uncertainty upper boundary and future industry expansion;
431 we find that these projected increases in emissions lead to maximum increases in terpene
432 concentrations of up to 5.0 ppb. The largest impacts were seen in locations with the highest
433 terpene emissions coming from CCFs, i.e. in Denver County. We further found that these
434 increases in terpene concentrations affected the local atmospheric chemistry and air quality
435 with ground-level ozone concentrations increasing by as much as 0.34 ppb during the day and
436 0.67 ppb at night. In general, simulated nighttime increases were higher than those during the
437 daytime were, and we take the nighttime of July 27th – 28th as a case study to further investigate.
438 By applying process analysis (PA), following the evolving plume of VOCs and ozone, we find
439 that the initial reactions of the additional terpenes with OH, NO₃ and ozone result in increased
440 formation of peroxy radicals which increases the NO to NO₂ conversion rate; also removes
441 the NO_x to generate more NO_z product. This effectively reduces the loss of ozone by reaction
442 with NO, increasing the total ozone concentration.

443 We acknowledge, however, the considerable uncertainties that surround our projections
444 and call for the need for continued efforts to reduce these such that a more accurate assessment
445 of the regional air quality implications of this industry can be made. Future studies that include
446 ambient BVOC measurements are critical for comparisons with model predictions.
447 Additionally, in the model chemical mechanism more accurate and mechanistic representation
448 of terpene species is needed that can reflect the current cannabis emission composition.
449 Currently, the model surrogate “TERP”, which represents all monoterpene species in the

450 mechanisms, may not represent the precise rate constant for BVOC emissions from cannabis.
451 Further data are needed to reduce uncertainties in emission inventory estimates specifically
452 those regarding CCF-specific information on plant counts, and weight by cultivar and growth
453 stage, coupled with information about the agronomical practices of Cannabis cultivation in
454 CCFs. Additional measurements of emission capacities of different cannabis strains at different
455 growth stages are also needed. Further, the emission inventory version is for the year 2011; it
456 may not be suitable to estimate the ozone impacts by the CCF industry.

457 We chose to focus on ozone, since Denver is a moderate non-attainment area with an
458 ozone State Implementation Plan (SIP) (ENVIRON and Alpine., 2017b, a; Colorado, 2018) in
459 accordance with the EPA regulations. But assessments of the impact of these additional terpene
460 emissions on particulate matter (PM_{2.5}) is warranted given the high secondary organic aerosol
461 (SOA) yields of terpenes from 0.3 to 0.8 (Iinuma et al., 2009; Lee et al., 2006; Fry et al., 2014;
462 Slade et al., 2017). It should also be borne in mind that investigations of indoor air quality are
463 needed given the findings of Martyny et al. (2013) and Southwellb et al. (2017) that indoor
464 terpene concentrations reached 50-100 ppb in growth rooms and 30-1,600 ppb in flowering
465 room, likely initiating intense photochemistry under the powerful grow lamps in use in CCFs.

466 **Code availability:**

- 467 1. The source code of the CAMx6.10 model can be downloaded on the Environ website:
468 <http://www.camx.com>
- 469 2. The process analysis tools and source codes including PseudoNetCDF, pyPA, and
470 PERMM, can be downloaded on GitHub: <https://github.com/barronh/pseudonetcdf>,
471 <https://github.com/barronh/pypa>, and <https://github.com/barronh/permm>
- 472 3. Python 2.7 is used to treat the model output and can be downloaded on anaconda
473 python website: <https://www.anaconda.com/distribution/>

474 **Data availability:**

475 The air quality model input data and output data (~2.3TB) of WAQS2011b episode
476 for Colorado can be downloaded on IWDW website:
477 <https://views.cira.colostate.edu/iwdw/>

478 **Author contribution**

479 Chi-Tsan Wang and Dr. William Vizuite are lead researchers in this study responsible for
480 research design, experiments, analyzing results and writing the manuscript. Dr. Christine
481 Wiedinmyer and Dr. Kirsti Ashworth are also co-head researchers, and guided the research
482 design, assessed model results, and contributed to writing the manuscript. Dr. John Ortega, and
483 Dr. Peter Harley helped in collecting data and writing the manuscript. Dr. Quazi Z. Rasool
484 helped to analyze model results and contributed in writing the manuscript.

485 **Competing interests**

486 The Authors declare that they have no conflict of interest.

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694

695 **Tables**

696 **Table 1.** Simulation scenarios and assumed values for emission capacity (*EC*) rate, dry plant
 697 weight (*DPW*), and the plant count (*PC*) for Colorado and Denver County. The base case (BC)
 698 scenario has no cannabis emissions.

Name	<i>EC</i>	<i>DPW</i>	<i>PC</i>	
	(ug gdw ⁻¹ hr ⁻¹)	(gdw plant ⁻¹)	Colorado	Denver County
BC	0	0	0	0
1_EC	10	750	1.0 × 10 ⁶	5.5×10 ⁵
2_EC	50	750	1.0 × 10 ⁶	5.5×10 ⁵
3_EC	100	750	1.0 × 10 ⁶	5.5×10 ⁵
4_DPW	10	1,500	1.0 × 10 ⁶	5.5×10 ⁵
5_DPW	10	2,500	1.0 × 10 ⁶	5.5×10 ⁵
6_PC	10	750	2.0 × 10 ⁶	1.1×10 ⁶
7_PC	10	750	4.0 × 10 ⁶	2.2×10 ⁶

699

700 **Table 2.** The estimated BVOC and total VOC emission rates (metric tons/year) for the base
701 case (BC) scenario. Also shown are the increases in VOC emissions for all scenarios shown in
702 Table 1 for Colorado, Denver County, Colorado Springs, Pueblo, and Boulder. The numbers
703 in parenthesis are the percentage increases compared with the BC scenario.

Name	Colorado		Denver County		Colorado Springs		Pueblo		Boulder	
	BVOC	Total VOC	BVOC	Total VOC	BVOC	Total VOC	BVOC	Total VOC	BVOC	Total VOC
BC	340,268	731,442	265	10,465	5,184	15,143	5,870	9,184	3,677	9,820
3_EC	657 (+0.19%)	+0.09%	362 (+136%)	+3.5%	60 (+1.20%)	+0.40%	53 (+0.90%)	+0.58%	26 (+0.70%)	+0.26%
2_EC	329 (+0.10%)	+0.04%	181 (+68%)	+1.7%	30 (+0.58%)	+0.20%	27 (+0.45%)	+0.29%	13 (+0.35%)	+0.13%
7_PC	261 (+0.08%)	+0.04%	116 (+44%)	+1.1%	42 (+0.80%)	+0.27%	22 (+0.38%)	+0.24%	12 (+0.33%)	+0.12%
5_DPW	219 (+0.06%)	+0.03%	121 (+45%)	+1.2%	20 (+0.39%)	+0.13%	18 (+0.30%)	+0.19%	9 (+0.23%)	+0.09%
4_DPW	131 (+0.04%)	+0.02%	72 (+27%)	+0.69%	12 (+0.23%)	+0.08%	11 (+0.18%)	+0.12%	5 (+0.14%)	+0.05%
6_PC	131 (+0.04%)	+0.02%	72 (+27%)	+0.69%	12 (+0.23%)	+0.08%	11 (+0.18%)	+0.12%	5 (+0.14%)	+0.05%
1_EC	66 (+0.02%)	+0.01%	36 (+14%)	+0.35%	6 (+0.12%)	+0.04%	5 (+0.09%)	+0.06%	3 (+0.07%)	+0.03%

704

705 **Table 3.** All data summed from July 27th, 9:00 PM LST to July 28th, 5:00 AM LST for grid
 706 cells and layers shown in Fig. S4. The base case (BC) scenario column shows the absolute
 707 predicted values and, the subsequent columns show the predicted changes due to emissions
 708 from the 3_EC scenario. Percentages in parenthesis are the changes in 3_EC relative to BC.
 709 Shown are the **(a)** total amount of VOC and TERP consumed due to oxidation (ppb), the **(b)**
 710 total amount of hydroxyl radical (OH) and total peroxy radicals (TRO₂) that were generated
 711 and their sources (ppb), and the **(c)** total amount of Nitrogen Dioxide (NO₂) and NO_x
 712 termination products (NO_z) produced and their sources (ppb).

713 (a)

	BC	3_EC
VOC + OH	1.36	1.68 (+23.5%)
TERP + OH	0.01	0.10 (+900%)
VOC + NO ₃	0.91	2.05 (+125%)
TERP + NO ₃	0.39	1.58 (+305%)
VOC + O ₃	1.80	1.97 (+9.40%)
TERP + O ₃	0.04	0.20 (+400%)

714

715 (b)

	BC	3_EC
OH generation (from VOC + O ₃)	1.00	1.10 (+10.0%)
from TERP + O ₃	0.03	0.11 (+267%)
TRO ₂ generation	34.2	42.8 (+25.1%)
from VOC initial reactions	3.25	5.03 (+54.8%)
from TERP initial reactions	0.47	1.98 (+321%)

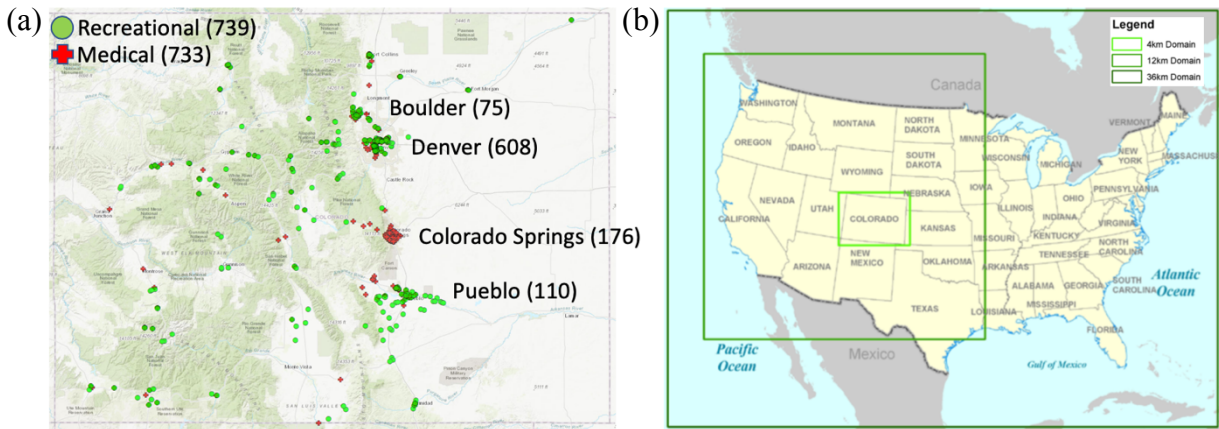
716

717 (c)

	BC	3_EC
NO to NO ₂	198	197 (-0.70%)
NO + O ₃	158	157 (-0.80%)
NO + TRO ₂	3.50	5.04 (+44.0%)
NO _z generation	4.91	6.24 (+27.1%)
NTR generation	0.66	1.60 (+142%)
PAN generation	1.54	1.56 (+1.30%)
PANX generation	0.54	0.66 (+22.2%)
HNO ₃ generation	2.17	2.42 (+11.5%)

718

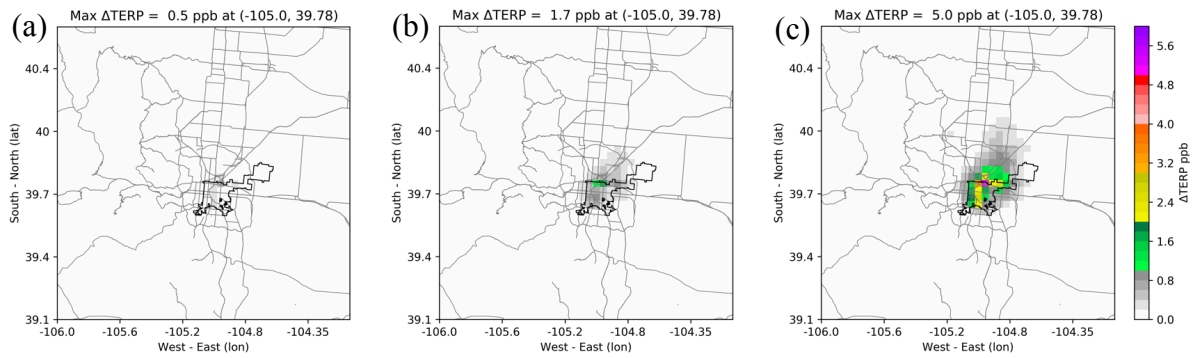
719 **Figures**



720

721 **Figure 1. (a)** The locations of medical (red) and retail (green) Cannabis cultivation facilities
722 (CCFs) in Colorado as of March 1, 2018. The corresponding values are the number of CCFs
723 found within each city. **(b)** The 36km × 36km resolution of Western Air Quality Model Study
724 (WAQS) and nested inner 12km × 12km resolution domains and 4km × 4km resolution domain
725 used by the Comprehensive Air Quality Model with Extensions (CAMx) (ENVIRON and
726 Alpine., 2017b).

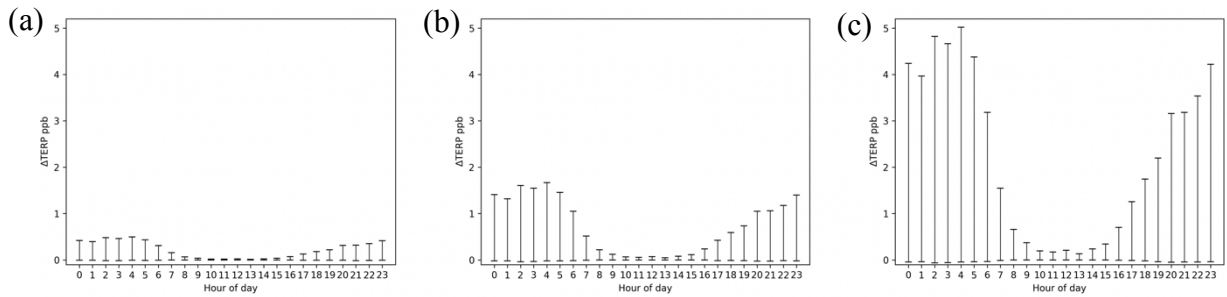
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728

729 **Figure 2.** The maximum increase in TERP concentrations (ppb) for Denver County and Front
 730 Range over the entire 90-day simulation for the (a) 1_EC, (b) 5_DPW, and (c) 3_EC scenarios.
 731 The black outlines Denver County and the grey lines are state and interstate highways.

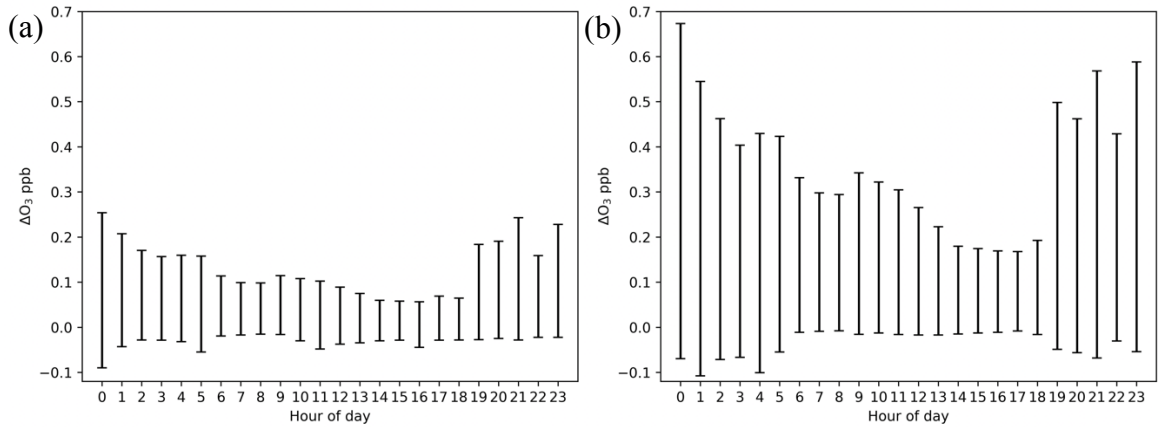
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733

734 **Figure 3.** The hourly changes in TERP concentrations across the entire 4 km × 4 km domain,
 735 over the 90 days simulation for the (a) 1_EC, (b) 5_DPW and (c) 3_EC scenarios.

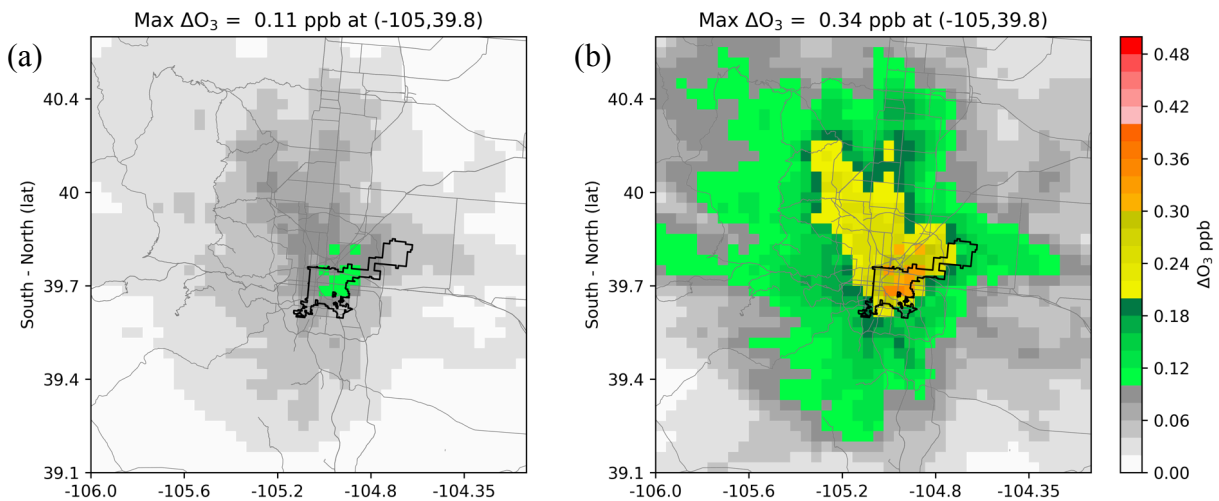
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737

738 **Figure 4.** The predicted differences in hourly ozone concentrations (ppb) across the entire
 739 Colorado domain, over the 90 days simulation for the **(a)** 5_DPW and **(b)** 3_EC scenarios.

740



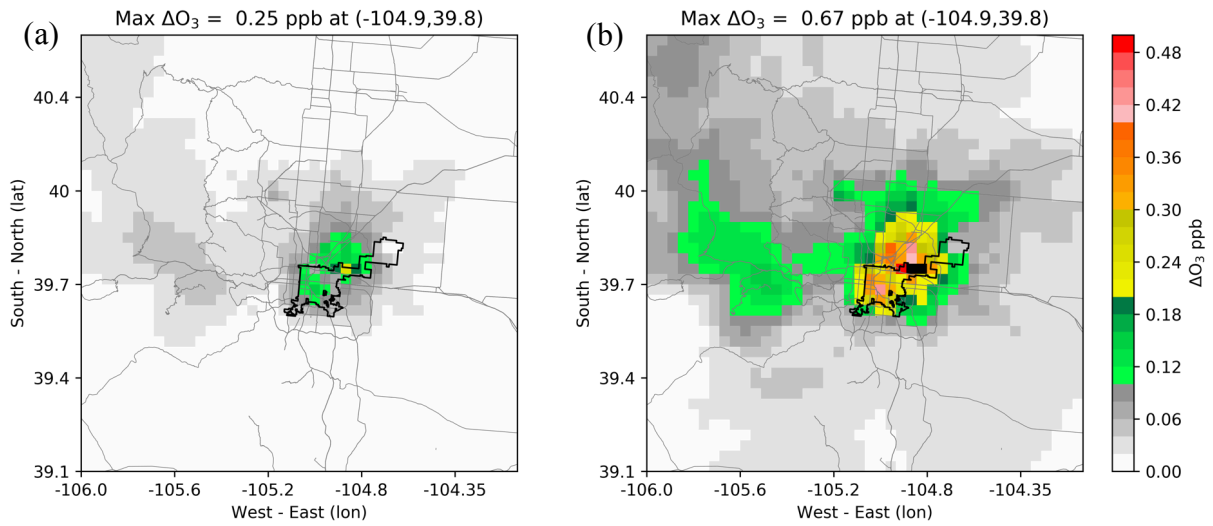
741

742 **Figure 5.** The predicted changes in hourly ozone concentrations for the Denver region from 6
 743 AM – 6 PM LST for all 90 days of the simulation for the **(a)** 5_DPW and **(b)** 3_EC scenarios.

744

The grey lines indicate major highways and the black line outlines Denver County.

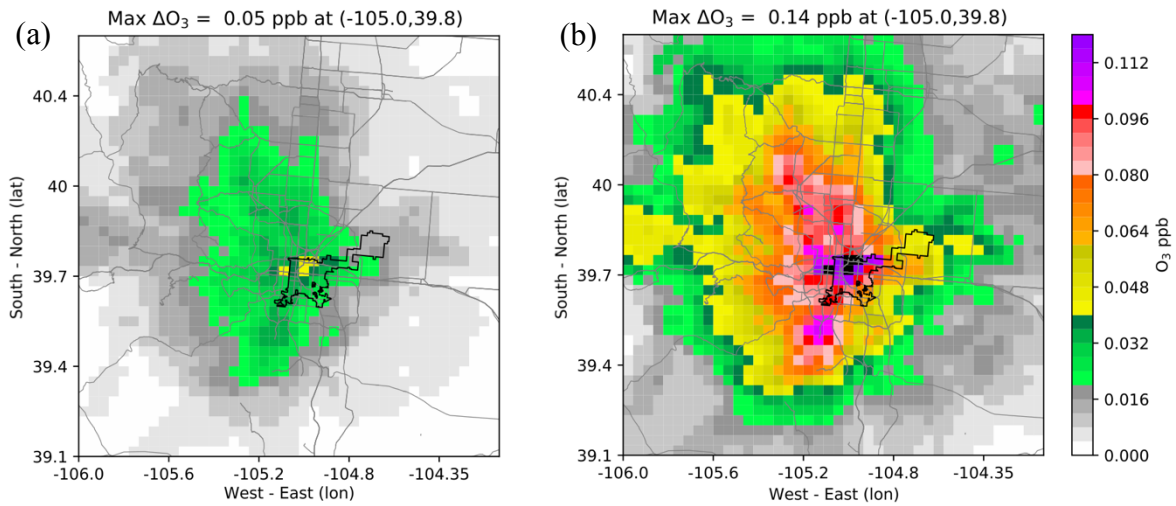
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746

747 **Figure 6.** The predicted changes in hourly ozone concentrations for the Denver region from 6
 748 PM – 6 AM LST for all 90 days of the simulation for the **(a)** 5_DPW and **(b)** 3_EC scenarios.
 749 Black regions within the map indicate ozone increase values greater than 0.5 ppb. The grey
 750 lines indicate major highways and the black line outlines Denver County.

751



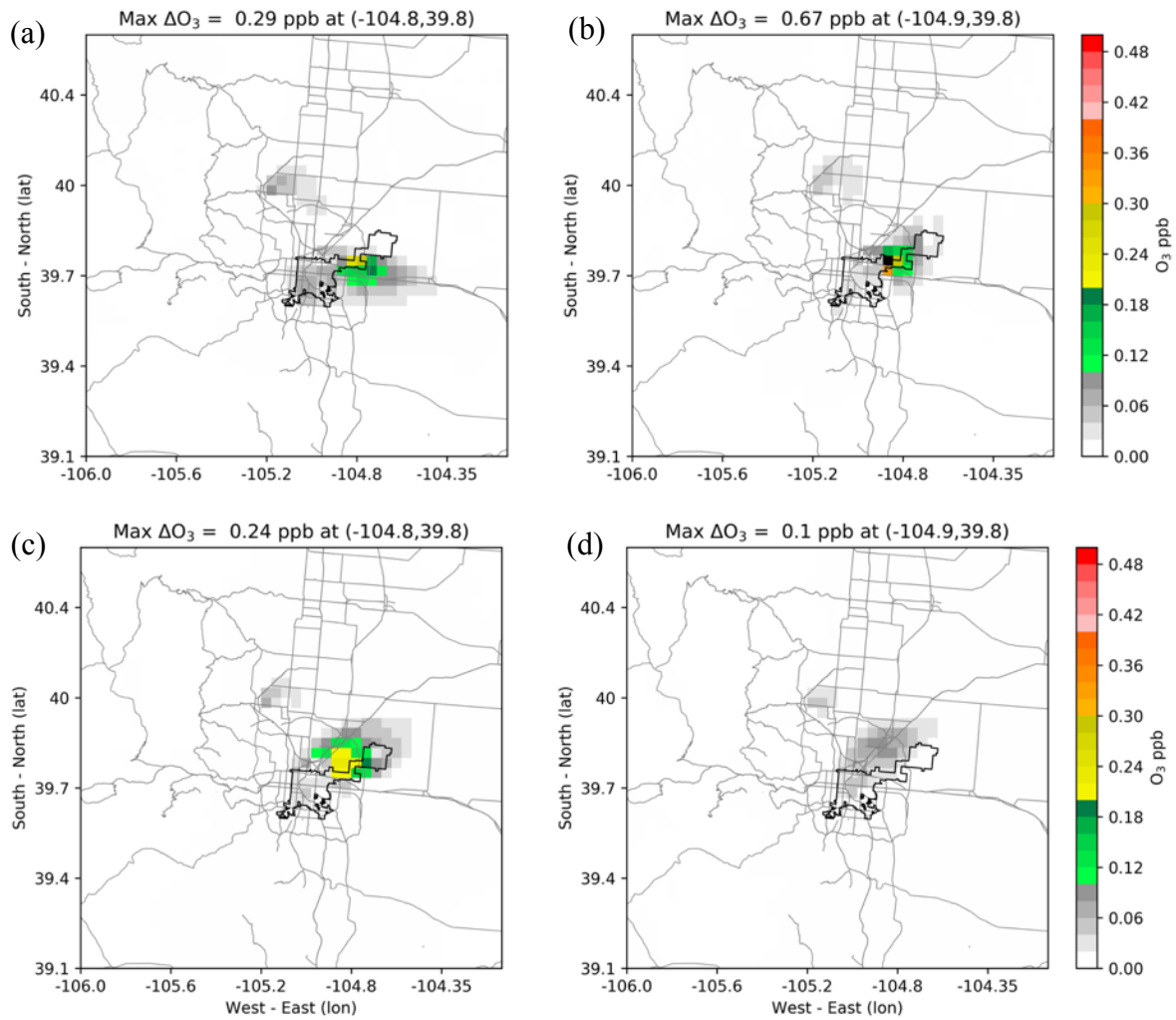
752

753 **Figure 7.** The predicted maximum increases in the maximum daily average 8-hour (MDA8)

754 ozone concentration (ppb) for the (a) 5_DPW and (b) 3_EC scenarios for the Denver region

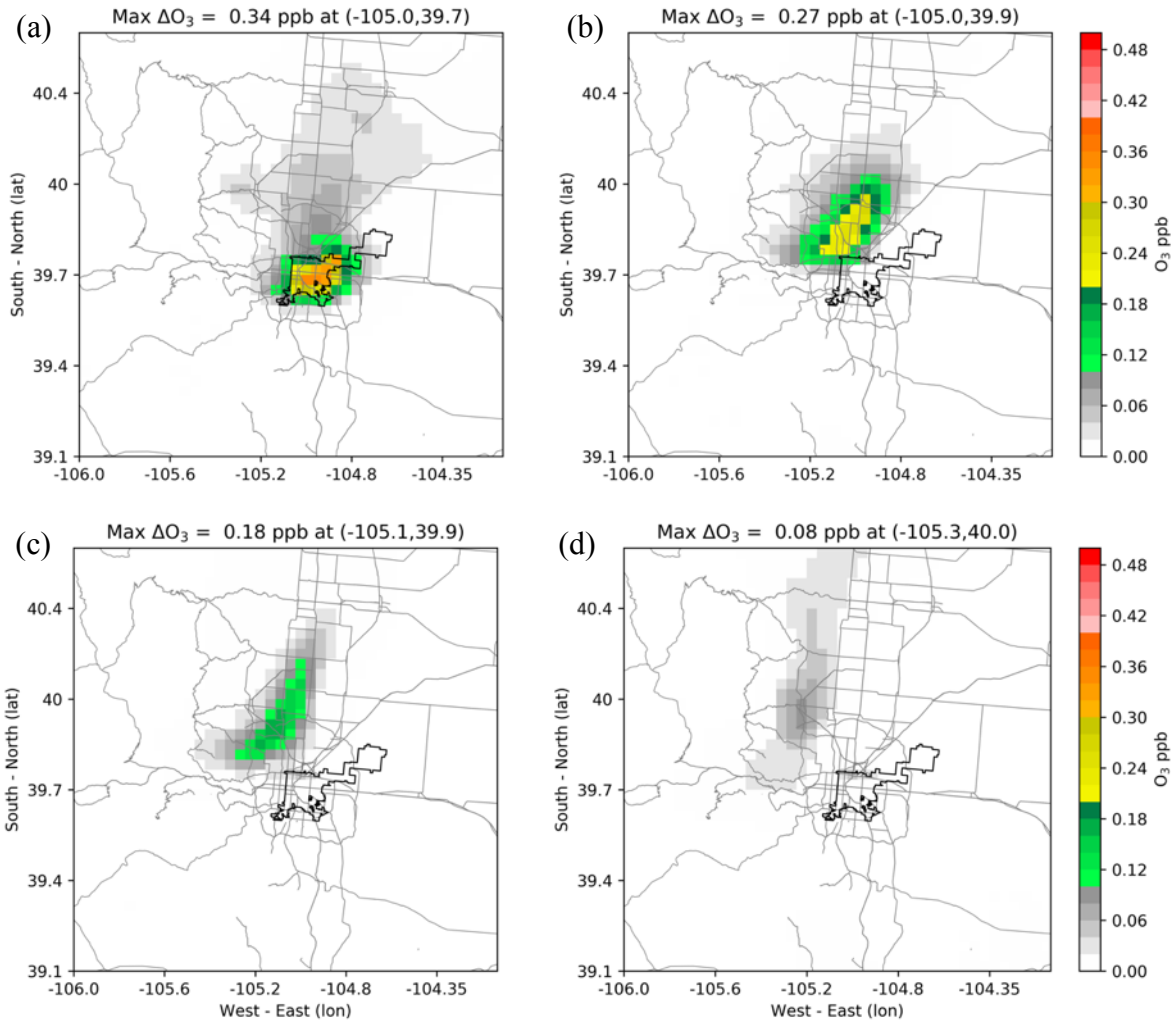
755 over the 90-day simulation period. The black indicates ozone increase values greater than

756 0.12 ppb.



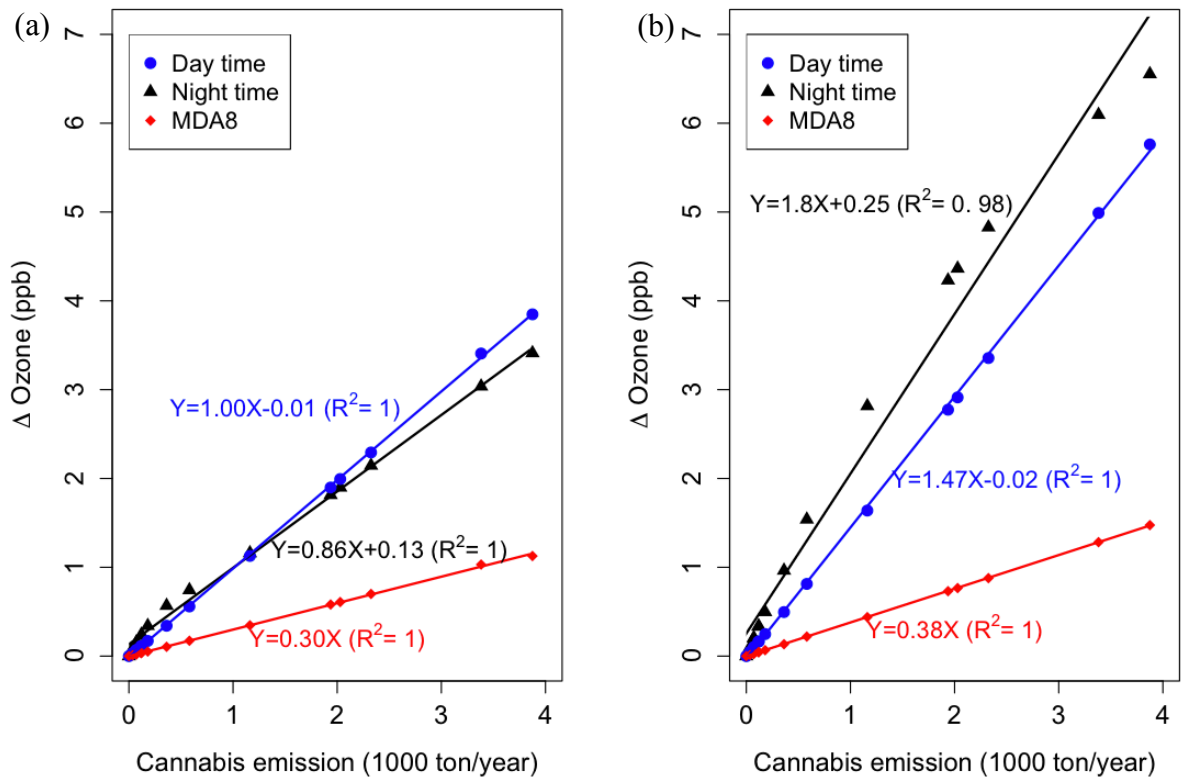
757

758 **Figure 8.** For the 3_EC scenario on July 28th, 2011, the largest hourly predicted ground level
 759 ozone increases at (a) July 27th, 9 PM LST, and for July 28th, at (b) 0 AM LST (i.e. midnight),
 760 (c) 3 AM LST and (d) 6 AM LST.



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762 **Figure 9.** For the 3_EC scenario on July 18th, 2011 the largest hourly predicted ground level
 763 ozone increases at **(a)** 9 AM LST, **(b)** 12 PM LST (i.e. noon), **(c)** 2 PM LST, and **(d)** 5 PM
 764 LST. The maximum of 0.34 ppb occurred at 9 AM LST.



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Figure 10. For July 18th during (a) 2011 and (b) 2017 the predicted maximum increase in hourly ozone concentrations during daytime hours (6 AM – 6 PM LST) in blue, and nighttime hours (6 PM– 6 AM LST) in black versus additional terpene emissions in Denver County. Also shown is the response in maximum daily average 8-hour ozone concentration (MDA8) in red.