

# 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, 2015a, b). The principle (trace) components are reported to  
67 be:  $\alpha$ - and  $\beta$ -pinene,  $\beta$ -myrcene, d-limonene, cis-ocimene,  $\beta$ -caryophyllene,  $\beta$ -farnesene and  $\alpha$ -  
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, 2015a). 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 ( $\Delta^9$ -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  $361 \pm 497$  ppb in  
80 those facilities (Southwellb et al., 2017). These indoor measurements indicate the presence of  
81 BVOCs, but only limited studies have actually determined the chemical profile of gases  
82 actually emitted by the growing plants. For comparison, summertime outdoor monoterpene  
83 concentrations in forested regions of Colorado are typically less than 4 ppb (Ortega et al.,  
84 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., 2018a).  
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  $210 \pm 272 \text{ g}$  (Fig. S1A). The Washington database also  
159 includes the “wet bud” weight defined as the mass of the bud after it was just harvested (Fig.  
160 S1B), but prior to the 7-10 day drying process. The total waste weight, or the remaining mass  
161 of the plant after the buds have been harvested, is also recorded. As shown in Eq. (2), the sum  
162 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  $3.77 \pm 3.62 \text{ kg}$  (Fig. S1C). The large range in mass is due to  
168 the different growing conditions found in CCFs, and the type of strain being grown. The ratio  
169 of the wet and dry bud mass data from Washington was used as a surrogate to determine the  
170 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 and standard deviation of *DPW* was  $754 \pm 723$ g (Fig. S1E). For the  
178 development of these emission inventories, a base value of 750 g was assumed for *DPW* based  
179 on the average calculated from the Washington database. As a sensitivity test, a *DPW* of 1,500  
180 g representing the mean plus one standard deviation range was chosen. Finally, a *DPW* of 2,500  
181 g, the maximum yield recorded by Washington State Liquor and Cannabis Board, was taken  
182 as the upper statistical boundary as shown in Fig. S1E. As the total plant count and reported  
183 yields are 3 and 4 higher respectively in Colorado than Washington state (LCB, 2017;  
184 Topshelfdata, 2017; Hartman et al., 2018b), we took this maximum on the assumption that  
185 *Cannabis spp.* cultivated in CCFs in Colorado in summer season is grown under more optimal  
186 conditions than those 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, CO<sub>2</sub> 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<sup>-2</sup> s<sup>-1</sup> 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<sup>-1</sup> h<sup>-1</sup> 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<sup>-1</sup> h<sup>-1</sup>. 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 and  
226 Geophysics, 2017), was used to predict ground-level ozone concentrations. The model and  
227 protocols used in this study are based on the Western Air Quality Modeling Study (WAQS) for  
228 2011 (Adelman et al., 2016; Environ and Geophysics, 2017). The WAQS 2011b baseline  
229 model simulation period runs from June 15<sup>th</sup> to September 15<sup>th</sup>, 2011, and is driven with  
230 meteorological data from WRF version 3.3 for the same time period and domain. The model  
231 was initialized using Three-State Air Quality Modeling Study standard boundary and initial  
232 conditions (Environ and Geophysics, 2017). The model domain is a 2-way nested grid at 12  
233 and 4 km grid cell resolutions (Fig. 1B). Anthropogenic emissions were derived from EPA  
234 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 (NO<sub>3</sub>), the  
243 hydroxyl radical (OH), ozone (O<sub>3</sub>), and singlet oxygen. It should be noted that the TERP  
244 category includes a wide variety of monoterpenes whose reaction rate constants may vary from  
245 TERP ( $k_{298} = 6.77 \times 10^{-11}$  molecules cm<sup>-3</sup> s<sup>-1</sup>). For example, the rate constant of  $\beta$ -myrcene  
246 with OH radical (Hites and Turner, 2009) is  $3.35 \times 10^{-10}$  molecules cm<sup>-3</sup> s<sup>-1</sup> ( $k_{298}$ ), which is 4  
247 time higher than TERP and 5.6 times faster than  $\alpha$ -pinene (Carter, 2010).

248 The details of the WAQS model setup protocol (Environ and Geophysics, 2017) 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  $\times$  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  $\text{h}^{-1}$ ) resulted in a 657 metric tons/year increase. Similarly, scenario 2\_EC assumes  $50 \mu\text{g gdw}^{-1}$   
278  $\text{h}^{-1}$  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  $\text{h}^{-1}$ . 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., 2018b). 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 27<sup>th</sup>, 9:00 PM to July 28<sup>th</sup>, 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 (NO<sub>3</sub>) (from 0.39  
367 ppb to 1.58 ppb; +305%), and O<sub>3</sub> (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 NO<sub>3</sub>. 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 + NO<sub>3</sub> reaction rates by  
371 125%. These increases produce more peroxy radicals (TRO<sub>2</sub>=HO<sub>2</sub> + RO<sub>2</sub>) driving further  
372 oxidation and further radical production. Table 3B also shows that the generation of OH  
373 radicals from reactions of TERP with O<sub>3</sub> increased by 267%. Ultimately, these increases in  
374 initial TERP reactions with NO<sub>3</sub> and O<sub>3</sub> increase the NO to NO<sub>2</sub> conversions via the TRO<sub>2</sub>  
375 pathway by 44%, reducing the availability of NO to react with O<sub>3</sub>. 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<sub>x</sub> termination products (NO<sub>z</sub>) by  
379 27% with organic nitrate (NTR; representing ~71% of this NO<sub>z</sub> product) increasing from 0.66  
380 ppb to 1.6 ppb (+142%). This increase in NO<sub>z</sub> 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 18<sup>th</sup>, 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 exceedance periods (Pfister et al.,  
387 2017). We thus chose to focus on July 18<sup>th</sup> 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 NO<sub>2</sub> conversion by TRO<sub>2</sub> 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  
405 relationship, indicative of a VOC limited environment, where hourly ozone concentrations are  
406 predicted to increase by 1 ppb for every 1,000 ton/year increase in TERP emissions during the  
407 day, and 0.85 ppb at night. Also shown is the sensitivity to the MDA8 ozone where there is a  
408 0.30 ppb increase for every 1,000 ton/year of TERP emissions. According to projected  
409 emission inventories provided by the state of Colorado, the ozone non-attainment area was  
410 expected to see reductions of 26.4% of NO<sub>x</sub> and 24.6% of VOC emissions by the year 2017  
411 (Environ, 2017). Under these reduced anthropogenic emission scenarios, Fig. 10B shows how  
412 ozone would then respond to additional CCF TERP emissions. Figure 10B continues to show  
413 a linear relationship, where hourly ozone concentrations are predicted to increase by 1.5 ppb  
414 for every 1,000 ton/year increase in TERP emissions during the day, and 1.8 ppb at night. In  
415 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 27<sup>th</sup> – 28<sup>th</sup> 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, NO<sub>3</sub> and ozone result in increased  
440 formation of peroxy radicals which increases the NO to NO<sub>2</sub> conversion rate; also removes  
441 the NO<sub>x</sub> to generate more NO<sub>z</sub> 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, 2017; Environ and Geophysics, 2017;  
459 Colorado, 2018) in accordance with the EPA regulations. But assessments of the impact of  
460 these additional terpene emissions on particulate matter (PM<sub>2.5</sub>) is warranted given the high  
461 secondary organic aerosol (SOA) yields of terpenes from 0.3 to 0.8 (Iinuma et al., 2009; Lee  
462 et al., 2006; Fry et al., 2014; Slade et al., 2017). It should also be borne in mind that  
463 investigations of indoor air quality are needed given the findings of Martyny et al. (2013) and  
464 Southwellb et al. (2017) that indoor terpene concentrations reached 50-100 ppb in growth  
465 rooms and 30-1,600 ppb in flowering room, likely initiating intense photochemistry under the  
466 powerful grow lamps in use in CCFs.



467 **Code availability:**

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

475 **Data availability:**

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

479 **Author contribution**

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

486 **Competing interests**

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

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692 **Tables**

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

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

696



697 **Table 2.** The estimated BVOC and total VOC emission rates (metric tons/year) for the base  
698 case (BC) scenario. Also shown are the increases in VOC emissions for all scenarios shown in  
699 Table 1 for Colorado, Denver County, Colorado Springs, Pueblo, and Boulder. The numbers  
700 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 (+0.12%)	+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%

701

702 **Table 3.** All data summed from July 27<sup>th</sup>, 9:00 PM LST to July 28<sup>th</sup>, 5:00 AM LST for grid  
 703 cells and layers shown in Fig. S4. The base case (BC) scenario column shows the absolute  
 704 predicted values and, the subsequent columns show the predicted changes due to emissions  
 705 from the 3\_EC scenario. Percentages in parenthesis are the changes in 3\_EC relative to BC.  
 706 Shown are the **(A)** total amount of VOC and TERP consumed due to oxidation (ppb), the **(B)**  
 707 total amount of hydroxyl radical (OH) and total peroxy radicals (TRO<sub>2</sub>) that were generated  
 708 and their sources (ppb), and the **(C)** total amount of Nitrogen Dioxide (NO<sub>2</sub>) and NO<sub>x</sub>  
 709 termination products (NO<sub>z</sub>) produced and their sources (ppb).

710 A

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

711

712 B

	BC	3_EC
OH generation	1.00	1.10 (+10.0%)
from TERP + O <sub>3</sub>	0.03	0.11 (+267%)
TRO <sub>2</sub> 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%)

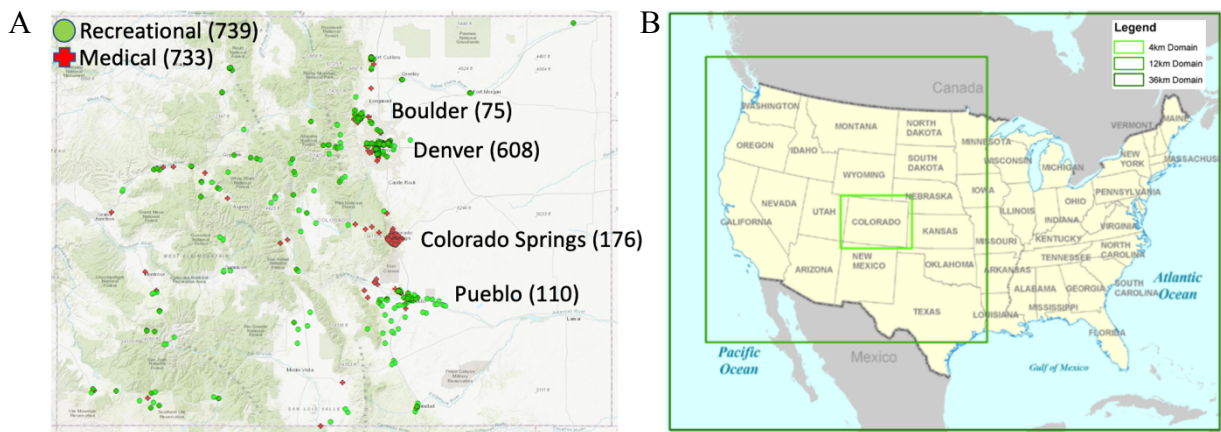
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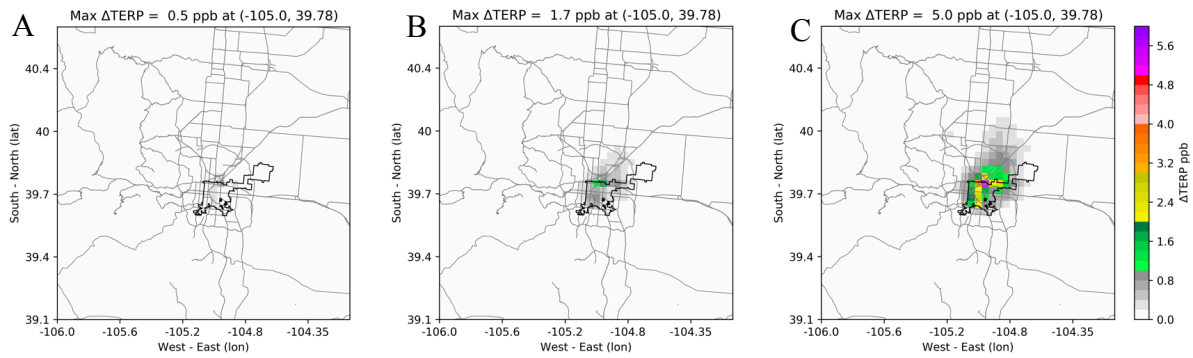
714 C

	BC	3_EC
NO to NO <sub>2</sub>	198	197 (-0.70%)
NO + O <sub>3</sub>	158	157 (-0.80%)
NO + TRO <sub>2</sub>	3.50	5.04 (+44.0%)
NO <sub>z</sub> 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 <sub>3</sub> generation	2.17	2.42 (+11.5%)

715

716 **Figures**

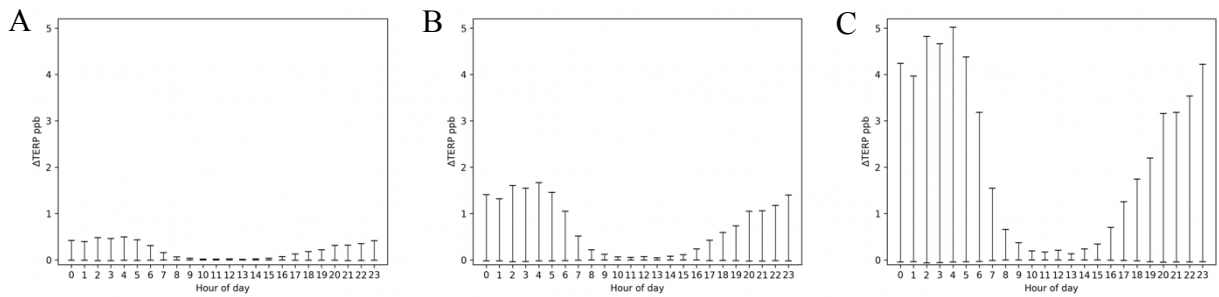




724

725 **Figure 2.** The maximum increase in TERP concentrations (ppb) for Denver County and Front  
 726 Range over the entire 90-day simulation for the (A) 1\_EC, (B) 5\_DPW, and (C) 3\_EC scenarios.  
 727 The black outlines Denver County and the grey lines are state and interstate highways.

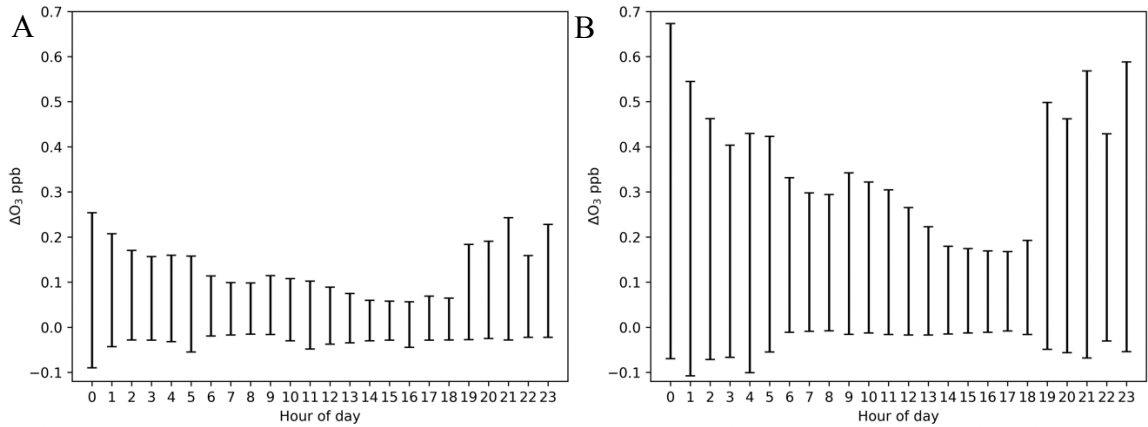
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730 **Figure 3.** The hourly changes in TERP concentrations across the entire 4 km × 4 km domain,  
 731 over the 90 days simulation for the (A) 1\_EC, (B) 5\_DPW and (C) 3\_EC scenarios.

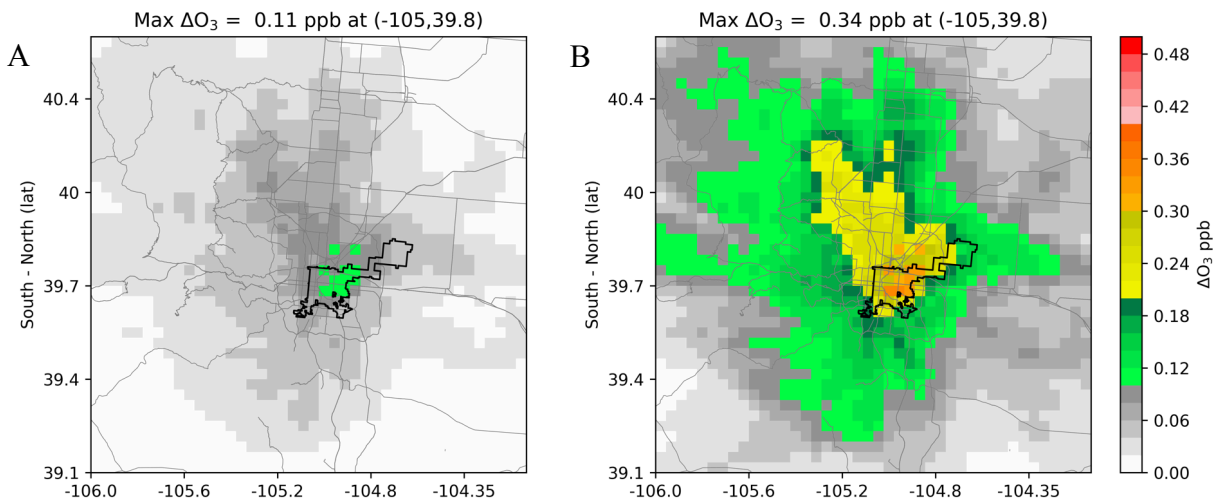
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734 **Figure 4.** The predicted differences in hourly ozone concentrations (ppb) across the entire  
 735 Colorado domain, over the 90 days simulation for the (A) 5\_DPW and (B) 3\_EC scenarios.

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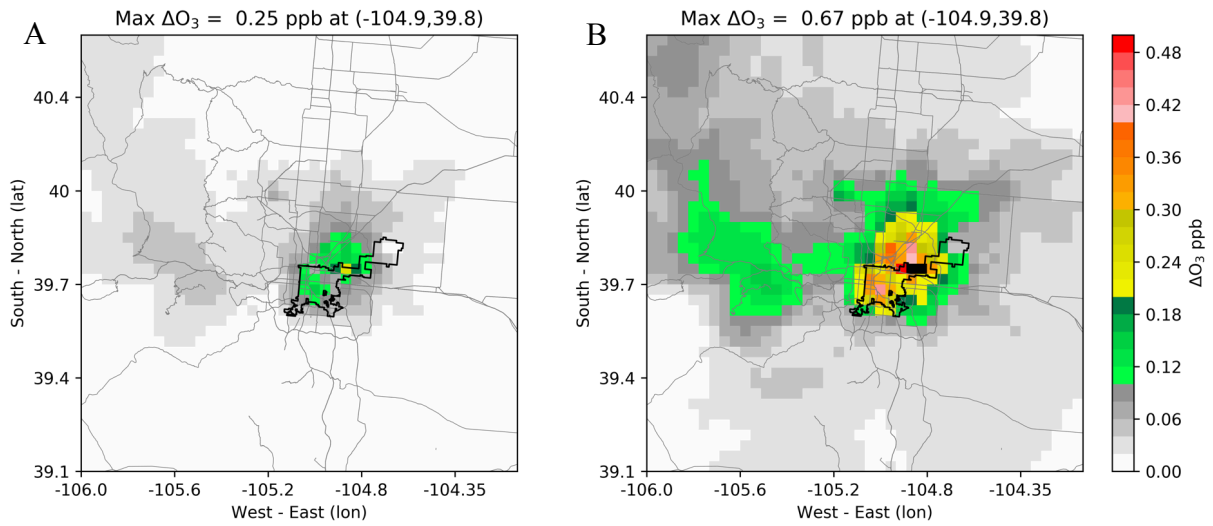


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738 **Figure 5.** The predicted changes in hourly ozone concentrations for the Denver region from 6  
 739 AM – 6 PM LST for all 90 days of the simulation for the (A) 5\_DPW and (B) 3\_EC scenarios.

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

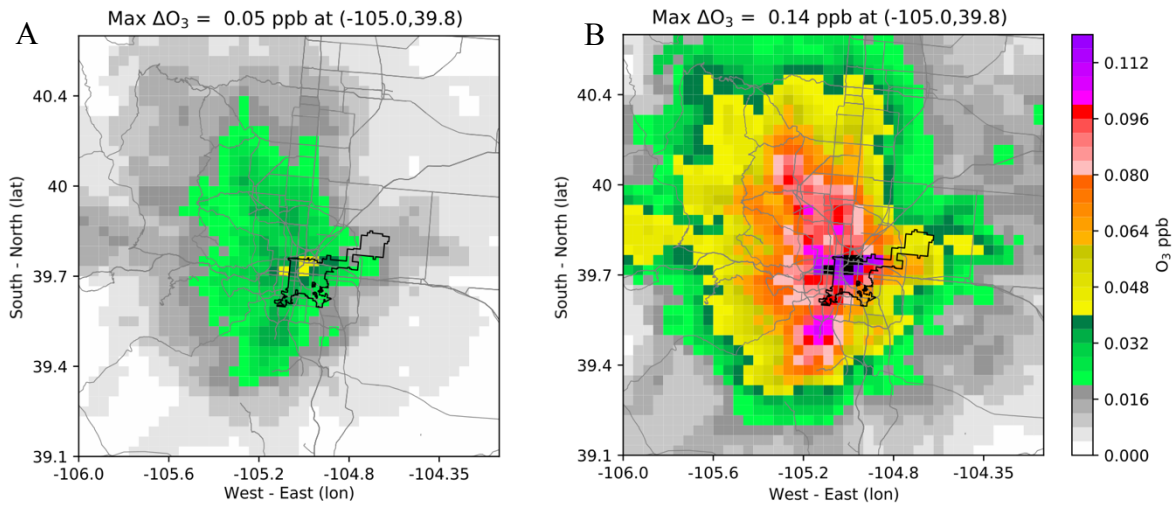
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743 **Figure 6.** The predicted changes in hourly ozone concentrations for the Denver region from 6  
 744 PM – 6 AM LST for all 90 days of the simulation for the (A) 5\_DPW and (B) 3\_EC scenarios.  
 745 Black regions within the map indicate ozone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

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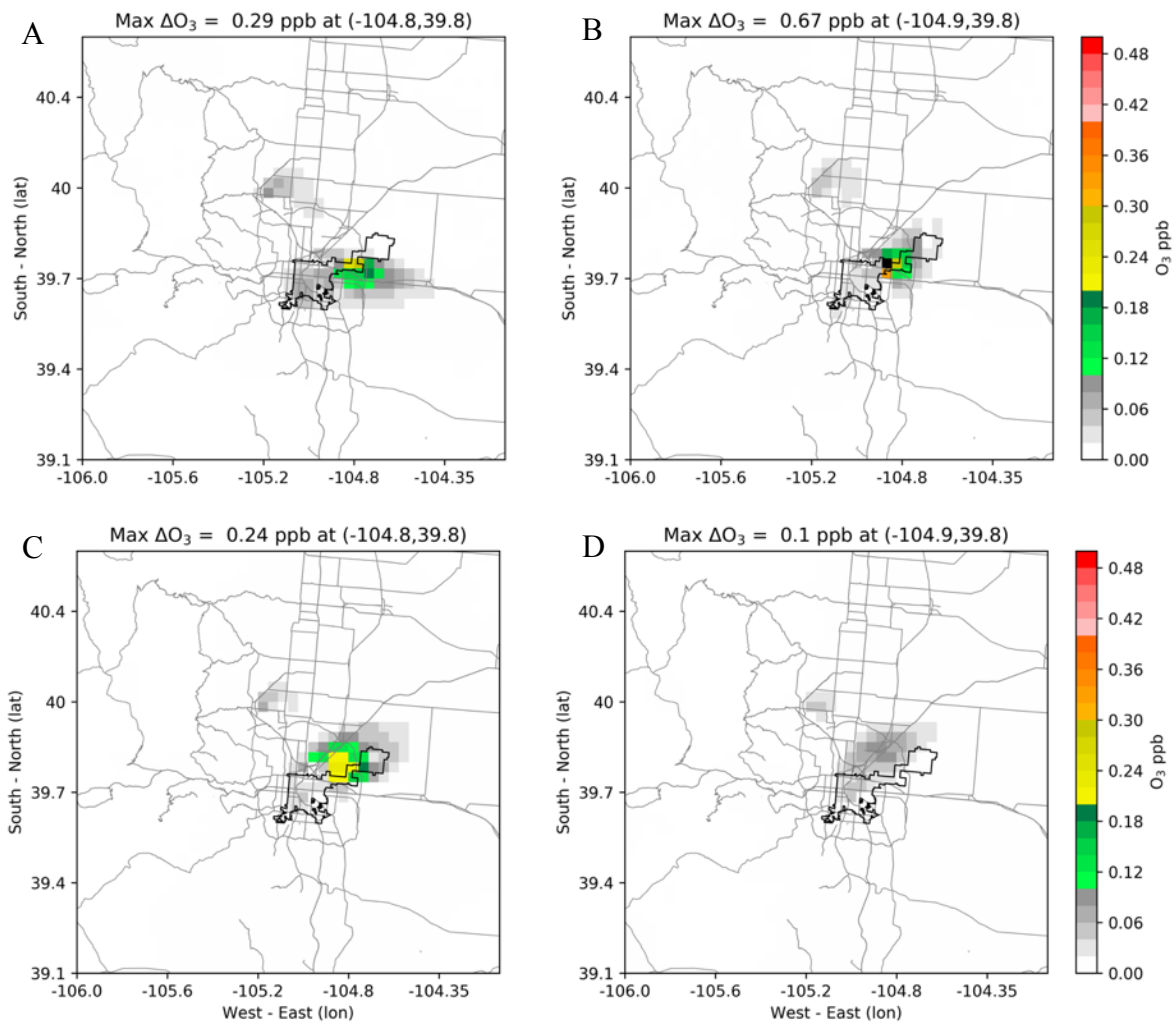
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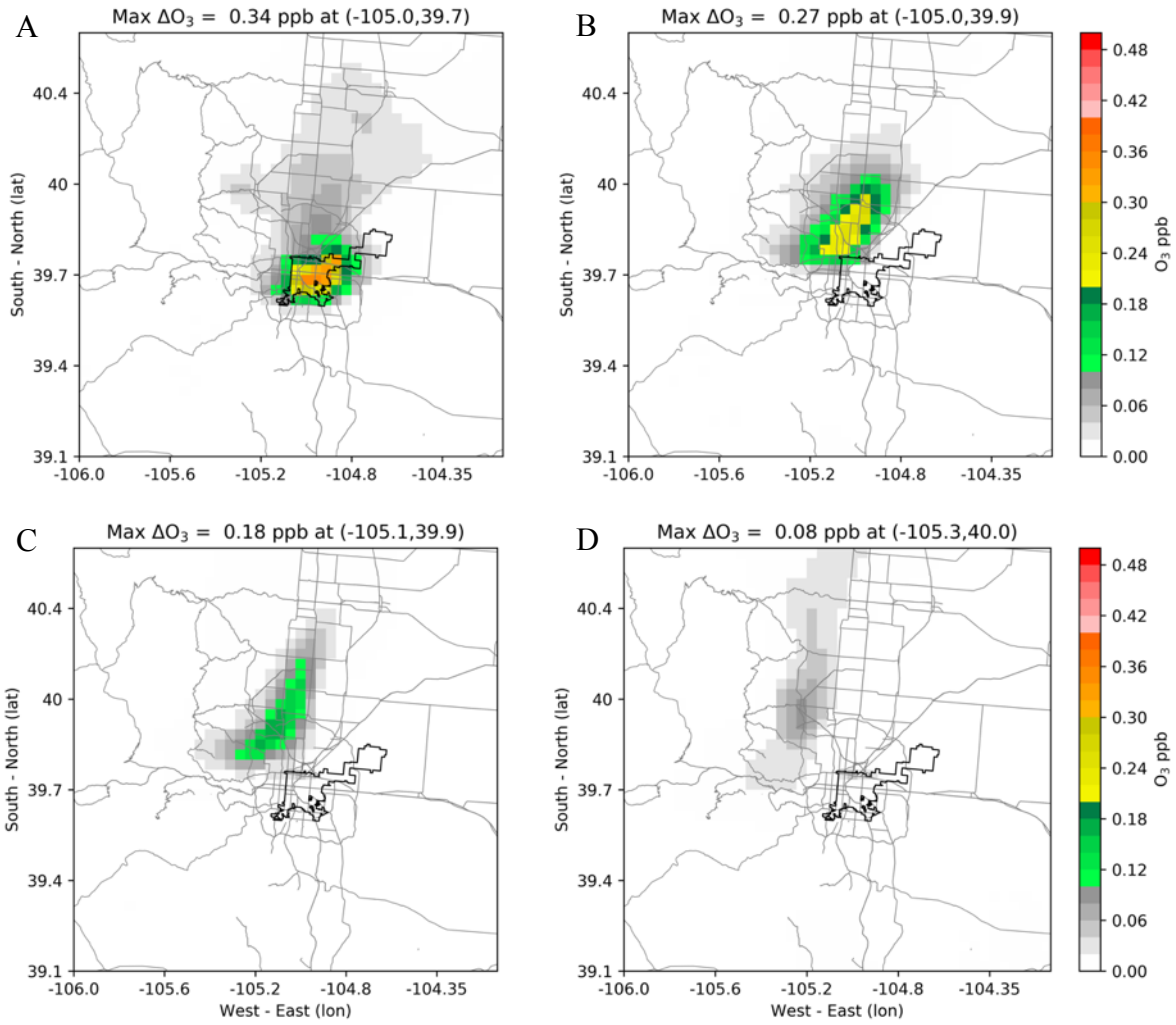
**Figure 7.** The predicted maximum increases in the maximum daily average 8-hour (MDA8) ozone concentration (ppb) for the (A) 5\_DPW and (B) 3\_EC scenarios for the Denver region over the 90-day simulation period. The black indicates ozone increase values greater than 0.12 ppb.



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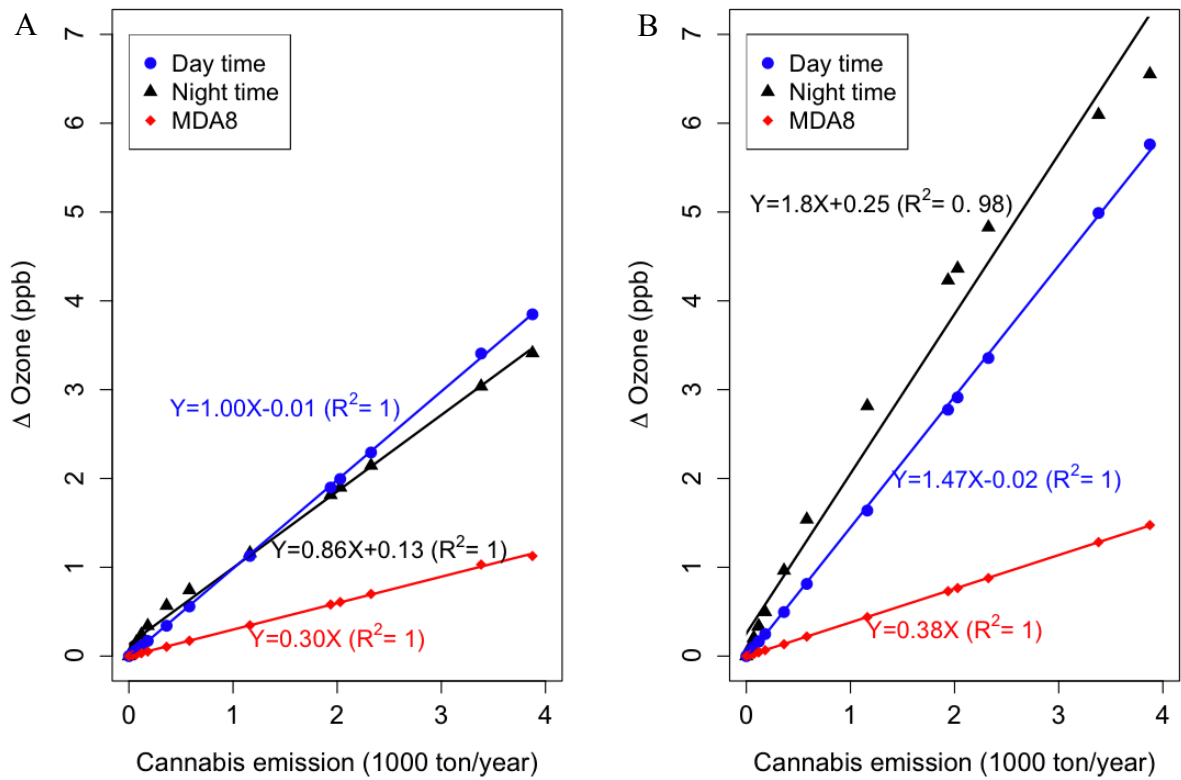
754 **Figure 8.** For the 3\_EC scenario on July 28<sup>th</sup>, 2011, the largest hourly predicted ground level  
 755 ozone increases at (A) July 27<sup>th</sup>, 9 PM LST, and for July 28<sup>th</sup>, at (B) 0 AM LST (i.e. midnight),  
 756 (C) 3 AM LST and (D) 6 AM LST.





757

758 **Figure 9.** For the 3\_EC scenario on July 18<sup>th</sup>, 2011 the largest hourly predicted ground level  
 759 ozone increases at **(A)** 9 AM LST, **(B)** 12 PM LST (i.e. noon), **(C)** 2 PM LST, and **(D)** 5 PM  
 760 LST. The maximum of 0.34 ppb occurred at 9 AM LST.



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**Figure 10.** For July 18<sup>th</sup> 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.