



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: 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, 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 (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 ± 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 at two intervals during the vegetative stage, and it is not
135 known how much EC will change during other stages. There are over 610 other strains (Leafly,
136 2018) that are grown in Colorado and the EC for these strains, or their emission rates during
137 other growth stages are currently unknown.

138 CCFs that operate in Colorado will have a wide variety of strains at all four stages of
139 growth whose inventory may vary throughout the year. Currently, no database exists that can
140 provide the number of plants by strain and growth stage. Thus, it was assumed that each CCF
141 had plants that consisted of only one strain and at the vegetative growth stage resulting in a
142 single and constant EC for each CCF. An EC of $10 \mu\text{g gdw}^{-1} \text{h}^{-1}$ of total monoterpenes was



143 chosen based on the Critical Mass strain from the leaf enclosures data (Wang et al., 2018). The
144 plants studied by Wang et al., however, were not grown in the optimized conditions found in a
145 CCF and the reported ECs could be conservative. Given this uncertainty in EC , and the variety
146 of possible plant stages and strains, sensitivity studies were performed with ECs being
147 multiplied by a factor of 5 and 10.

148 2.1.2 Dry Plant Weight (DPW)

149 No published studies report the DPW of a *Cannabis spp.* plant. Both the states of
150 Colorado (METRC, 2018) and Washington (LCB, 2017; Topshelfdata, 2017) track the mass
151 of the commercially sold portion of the plant, the “dry bud.” The Colorado database, however,
152 is not publicly accessible and was not available for this study. In Washington, using data from
153 all type of facilities (outdoor and indoor) from August–October 2017, it was found that the
154 average dry bud mass per plant was 210 ± 272 g (Fig. S1A). The Washington database also
155 includes the “wet bud” weight defined as the mass of the bud after it was just harvested (Fig.
156 S1B), but prior to the 7-10 day drying process. The total waste weight, or the remaining mass
157 of the plant after the buds have been harvested, is also recorded. As shown in Eq. (2), the sum
158 of these two masses should equal the total mass of the wet plant.

$$159 \quad M_{wet\ plant} = M_{wet\ buds} + M_{waste} \quad (2)$$

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

162 Data from August-October of 2017 were used with Eq. (2), to estimate the wet plant
163 weight resulting in an average of 3.77 ± 3.62 kg (Fig. S1C). The large range in mass is due to
164 the different growing conditions found in CCFs, and the type of strain being grown. The ratio
165 of the wet and dry bud mass data from Washington was used as a surrogate to determine the
166 percentage of water found in the total plant material as shown in Eq. (3).

$$167 \quad R_{D/W} = M_{dry\ bud} / M_{wet\ bud} \quad (3)$$

168 Where, $R_{D/W}$ is the ratio of the masses of the dry to wet bud, and $M_{dry\ bud}$ (g) is the
169 mass of the harvested buds after 7-10 days of drying (Fig. S1D).

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

$$172 \quad DPW = M_{wet\ plant} \times R_{D/W} \quad (4)$$



173 The average and standard deviation of DPW was 754 ± 723 g (Fig. S1E). For the
174 development of these emission inventories, a DPW of 750 g was assumed based on the average
175 from the Washington database. As a sensitivity, a DPW of 1,500 g was chosen for one standard
176 deviation range, and 2,500 g was chosen based on the upper statistical boundary as shown in
177 Fig. S1E.

178 2.1.3 Plant Count (PC)

179 Counts of all plants larger than 8 inches have been recorded by the Colorado DOR once
180 per month since 2014. As of June 2018, there are 1.06 million plants (Hartman et al., 2018b,
181 a). Therefore, 1 million was used as the base number for the emission inventory. The DOR data
182 only provides county-level information and does not provide details concerning the number of
183 plants for each CCF. Thus, the county level data and number of CCFs per county was used to
184 calculate an average number of plants per facility. The average plant count per CCF in Denver
185 County was 905, and for areas outside of the county, it was 521 plants (Table S1).

186 From June 2016 (826,963 of plants) to June 2018 (1,062,765 of plants), the average
187 yearly increase in the number of plants was 118,000. Assuming this rate remains constant, by
188 2025, there could be 2 million plants in the state of Colorado. Hence, a sensitivity case was
189 developed to account for future growth that included these numbers of plants. Finally, each
190 CCF must apply for a tiered permit that determines the maximum number of plants that can be
191 grown and is shown in supplemental Table S2 (CDOR, 2019). As a sensitivity, it was assumed
192 that each recreational and medical CCF would contain the maximum number of the tier one
193 permitted plants leading to a state-wide total of 4 million plants. The average plant counts per
194 CCF and total state-wide plant counts are shown in Table S1.

195 2.2 Emission Inventories for Cannabis Cultivation Facilities (CCF)

196 Given the large gaps in knowledge, this study will focus only on variabilities in EC ,
197 DPW , and PC and will hold other parameters constant. For example, to maximize growing
198 conditions relative humidity, temperatures, CO_2 concentrations, and fertilizer usage are all
199 optimized and vary widely by CCF. Further, this study did not consider other processes such
200 as trimming, harvesting and drying buds which may also release BVOCs.

201 For this study, it was assumed that all CCFs operated in the same way at a temperature
202 of $30^\circ C$ and $1000 \mu mol m^{-2} s^{-1}$ of photosynthetically active radiation (PAR). In addition, it was
203 assumed that all emissions from the plants inside a CCF enter the atmosphere. Ventilation to



204 the atmosphere varies widely by the operation, and there are no current regulations or industry-
205 wide practices that are being used to mitigate emissions.

206 In total, seven scenarios of emission inventories were created to explore sensitivities in
207 *EC*, *DPW*, and *PC* as shown in Table 1. In scenarios 1-3, the *PC* was held to a total of 1 million
208 and a 750 g *DPW* was assumed. The *EC* of 10 $\mu\text{g gdw}^{-1} \text{h}^{-1}$ as reported by Wang et al. (2018)
209 was used in 1_*EC*, with a sensitivity that multiplied that rate by a factor of 5 (scenario 2_*EC*),
210 and 10 (scenario 3_*EC*). The remaining scenarios in Table 1 kept the *EC* constant at 10 μg
211 $\text{gdw}^{-1} \text{h}^{-1}$. Scenarios 4_*DPW* and 5_*DPW* explored the sensitivity of increasing *DPW*, and
212 scenarios 6_*PC* and 7_*PC* increased the total plant count.

213 **2.3 Model description and analysis tools**

214 **2.3.1 Model protocols and evaluation**

215 The Comprehensive Air Quality Model with Extensions, CAMx6.10 (Environ and
216 Geophysics, 2017), was used to predict ground-level ozone concentrations. The model and
217 protocols used in this study are based on the Western Air Quality Modeling Study (WAQS) for
218 2011 (Adelman et al., 2016; Environ and Geophysics, 2017). The WAQS 2011b baseline
219 model simulation period runs from June 15th to September 15th, 2011, and is driven with
220 meteorological data from WRF version 3.3 for the same time period and domain. The model
221 was initialized using Three-State Air Quality Modeling Study standard boundary and initial
222 conditions (Environ and Geophysics, 2017). The model domain is a 2-way nested grid at 12
223 and 4 km grid cell resolutions (Fig. 1B). Anthropogenic emissions were derived from EPA
224 National Emission Inventory (NEI) version 2011 NEIv2 with updates for point and area
225 sources of oil and gas emissions in the western US. The biogenic emissions inventory was
226 based on the Model of Emissions of Gases and Aerosols from Nature version 2.1
227 (MEGANv2.1) (Guenther et al., 2012). All data and supporting documentation are publicly
228 available via the Intermountain West Data Warehouse (IWDW) website (WAQS, 2017).

229 The revision 2 of Carbon Bond 6 (CB6r2) (Ruiz and Yarwood, 2013) chemistry
230 mechanism was used in all model runs. This groups all monoterpenes as a single compound
231 species, TERP. Thus, the total monoterpenes EC reported in Wang et al. (2018) was converted
232 into the TERP species. TERP undergoes oxidation reactions with the nitrate radical (NO_3), the
233 hydroxyl radical (OH), ozone (O_3), and singlet oxygen. It should be noted that the TERP
234 category includes a wide variety of monoterpenes whose reaction rate constants may vary from
235 TERP ($k_{298} = 6.77 \times 10^{-11} \text{ molecules cm}^{-3} \text{ s}^{-1}$). For example, the rate constant of β -myrcene



236 with OH radical (Hites and Turner, 2009) is 3.35×10^{-10} molecules $\text{cm}^{-3} \text{s}^{-1}$ (k_{298}), which is 4
237 time higher than TERP and 5.6 times faster than α -pinene (Carter, 2010).

238 The details of the WAQS model setup protocol (Environ and Geophysics, 2017) and
239 model performance (Adelman et al., 2016) can be found in IWDW website. In summary, the
240 model performance evaluation concluded that this simulation had met all performance goals
241 for both maximum daily 1-hour (MDA1) and maximum daily 8-hour average (MDA8) ozone.
242 In the performance review report, it was found that the WAQS model had a positive bias for
243 ozone simulated in a 4 km \times 4 km resolution domain, when compared with EPA Air Quality
244 System (AQS) surface monitors (MDA1: 0.8%, MDA8: 0.9%). On days when ozone
245 concentrations higher than 60 ppb were measured, the model had a negative bias of -6.2% for
246 MDA1 and -6.3% for MDA8. The model evaluation result also noted that the model
247 performance was best during the spring and summer months.

248 2.3.2 Process Analysis

249 CAMx runs used in this analysis had the process analysis (PA) option enabled
250 (ENVIRON, 2013). The CAMx configuration used here produces two additional files needed
251 for PA: the integrated reaction rate (IRR) and integrated process rate (IPR). These files include
252 the rates of change in concentration of every species due to chemistry and transport for every
253 grid cell and timestep. Python-based Process Analysis (pyPA) and the Python Environment for
254 Reaction Mechanisms/Mathematics (PERMM) (Henderson et al., 2010; Henderson et al.,
255 2011) were then applied to post-processing the CAMx PA output. PERMM was used to
256 aggregate the chemical and physical process rates for selected model grid cells and layers
257 allowing for tracking of plumes within the planetary boundary layer (PBL).



258 3. Results

259 3.1 Emissions Inventory

260 The seven scenarios were used to estimate a range of emissions of BVOCs from CCFs
261 for the entire state of Colorado. As shown in Table 2, the base case (BC) scenario estimates
262 731,442 ton/year of all VOCs being emitted in Colorado, of which 47% are BVOCs. The BC
263 scenario does not include any emissions from the cannabis industry. Table 2 also shows the
264 seven scenarios that did include CCF emissions ranked in order of their increases in state-wide
265 BVOC emissions. As expected the CCF BVOC emissions scaled linearly with each factor that
266 was changed in Eq. (1). In scenario 3_EC, a 10-fold increase in the emission rate ($100 \mu\text{g gdw}^{-1} \text{h}^{-1}$)
267 resulted in a 657 metric tons/year increase. Similarly, scenario 2_EC assumes $50 \mu\text{g gdw}^{-1} \text{h}^{-1}$
268 and produces 329 metric tons/year. Scenarios 4 and 5 showed the sensitivity of terpene
269 emissions from CCFs to variation in *DPW* while holding *PC* constant and an *EC* of $10 \mu\text{g gdw}^{-1} \text{h}^{-1}$.
270 It was estimated that an additional 66 ton/year of emissions were produced when a 750 g
271 *DPW* is assumed. This doubles to 131 metric tons/year with a *DPW* of 1500 g and reaches 219
272 metric tons/year with a *DPW* of 2500 g. Comparing scenario 1_EC with scenario 6 and 7 shows
273 how the growth in *PC* will impact emissions of BVOCs. In Colorado, a doubling of the *PC*
274 increases BVOC emissions by 131 metric tons/year in scenario 6_PC and 261 metric tons/year
275 for the 4 million plants in scenario 7_PC. The largest increases in BVOC emissions were
276 predicted in scenarios 3_EC and 2_EC showing that the total emission rate of BVOCs from
277 CCFs were most sensitive to *EC*.

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

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



290 concentrations of CCFs. The absolute maximum changes ranged from 0.5-5.0 ppb located at
291 the Elyria Swansea and Globeville neighborhoods in north-central Denver. Increases in TERP
292 were also predicted to the north due to the dominant wind flows in that direction throughout
293 the simulation period. Figure S2 shows the maximum increase in TERP concentrations for the
294 1_EC, 5_DPW, and 3_EC scenarios in the 4 km × 4 km domain for the entire 90-day simulation
295 period. As expected substantially lower increases in TERP concentrations were predicted for
296 other cities in Colorado: 0.26 ppb in Colorado Springs and 0.24 ppb in Pueblo. Figure 3 shows
297 the hourly changes in TERP concentrations across the entire 4 km × 4 km domain. The largest
298 increases for all scenarios occurred at night with a peak of 5 ppb at 4:00 AM local standard
299 time (LST). Given that the hourly emissions of terpenes from CCFs were assumed constant for
300 24 hours, these larger nighttime changes can be primarily ascribed to the lack of
301 photochemistry and a shallow nocturnal PBL. These results suggest that the increases of TERP
302 are highly correlated with locations of CCFs, accumulate at night, and have significant losses
303 during the day.

304 3.2 Regional Ozone impacts

305 Predicted increases in hourly ozone concentrations in excess of 0.1 ppb only occurred
306 when terpene emissions were in excess of 219 metric tons per year, with scenarios 4_DPW,
307 6_PC, and 1_EC having little impact on predicted ozone. Thus, this analysis will focus on two
308 scenarios, 5_DPW, and 3_EC to explore potential regional ozone impacts in the present and
309 future. Figure 4 shows the hourly changes in ozone concentrations across the entire 4 km × 4
310 km domain for these two scenarios. During the daytime, the increase in TERP emissions results
311 in a peak ozone increase of 0.34 ppb at 9:00 AM LST for 3_EC with only minimal changes in
312 5_DPW. Figure 5 shows, for Denver County and the Front Range Metropolitan Area, the
313 locations of the daytime (6:00 AM – 6:00 PM LST) maximum increases in hourly ozone
314 concentrations for all 90 days when emissions were added for scenarios 5_DPW and 3_EC.
315 Ozone increases for the entire 4 km × 4 km domain can be found in Fig. S3. The largest
316 predicted ozone concentrations occurred in Denver County with impacts of 0.11 ppb in
317 5_DPW, and 0.34 ppb in 3_EC as shown in Fig. 5. Both scenarios show that daytime increases
318 in ozone were limited to Denver County and just to the northwest, west, and southwest of
319 Denver County.

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



322 during the day. The largest changes in hourly ozone concentrations of 0.67 ppb occurred at
323 0:00 AM LST (i.e. midnight) for 3_EC. Figure 6 shows the location and magnitude of the
324 maximum changes in hourly ozone concentrations during the night (6:00 PM – 6:00 AM LST)
325 in 5_DPW and 3_EC. The extent of ozone increases at night are primarily to the north of
326 Denver indicating a northern outflow. The maximum increase in hourly ozone for the whole of
327 Colorado is shown in Fig. S3, with visibly little changes at night in other cities. These model
328 results suggest that the additional emissions of TERP have immediate impacts on local ozone
329 production chemistry during both the day and night, but little wider impact.

330 A critical metric for the attainment of the NAAQS ozone standard in Denver County is
331 the maximum daily average 8-hour ozone concentration (MDA8). Figure 7 shows the
332 maximum difference in MDA8 for each grid cell centered on Denver County, across the entire
333 90-day simulation period for the 5_DPW, and 3_EC scenarios. Maximum increases in MDA8
334 are 0.14 ppb for 3_EC (Fig. 7B) co-located with the maximum increases in TERP
335 concentrations.

336 3.2.1 Ozone impact at night

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

341 To investigate the nighttime ozone increases, the PA model output was analysed to
342 quantify the chemical and physical processes producing ozone. Plume tracking was used so
343 that only grid cells where the increase in ozone occurred were included in our analysis, which
344 ran from 9:00 PM LST July 27th to 6:00 AM LST on July 28th. Vertical model layers were also
345 aggregated to follow the hourly evolution of the PBL. Figure S4 provides snapshots of the
346 horizontal grid cells used and the vertical layers that were aggregated throughout the simulation
347 time period. For these grid cells and layers, Fig. S5 shows the changes in final ozone
348 concentrations compared to BC and the physical and chemical process rates that impact those
349 concentrations. Figure S5 shows that the process that contributes most to the modelled
350 increases in ozone concentrations is chemical production.

351 For the chosen vertical layers and grid cells, Table 3A shows the total loss of TERP in
352 BC and 3_EC across the entire period. For this period, TERP consumption due to the OH
353 reactions led to a reduction in TERP from 0.01 to 0.1 ppb, NO₃ reactions led to a reduction



354 from 0.39 to 1.58 ppb, and O₃ reactions led to a reduction from 0.04 to 0.2 ppb, across
355 scenarios. These in turn increased the production of OH radicals and total peroxy radicals
356 (TRO₂). Table 3B also shows that the OH radical and total peroxy radicals (TRO₂) source
357 increased by 10.0% and 25.1% due to the TERP initial reactions. Ultimately, this TERP
358 consumption in 3_EC led to increases in NO to NO₂ conversions via the TRO₂ pathway by
359 44%, and reduction of ozone titration by 1 ppb (0.8%), as shown in Table 3C. Thus, the
360 increased ozone concentration at night is due to a decrease in ozone loss rather than an increase
361 in production. The TERP emission in 3_EC also resulted in increasing by 27% NO_x termination
362 products (NO_z). Organic nitrate (NTR) representing ~71% of NO_z product increased from 0.66
363 ppb to 1.6 ppb (+142%) with this increased TERP emission in 3_EC. This increase in NO_z
364 production at night results in lower NO concentrations further reducing the ozone titration.

365 3.2.2 Ozone impact during the day

366 The maximum daytime hourly ozone increase of 0.34 ppb occurred at 9:00 AM on
367 Monday, July 18th, 2011, as shown in Fig. 9. On this day, the meteorological conditions
368 favoured the maximum possible production of ozone. This day featured “upslope flows” that
369 are a common meteorological condition linked to ozone exceedances periods (Pfister et al.,
370 2017). We thus chose to focus on July 18th to understand the daytime changes in chemistry that
371 occur from increased BVOC emissions. As expected, the location of predicted ozone increases
372 coincides with the location of the strongest terpene emissions in the domain as shown in Fig.
373 9A. For the daytime hours of 6:00 AM – 2:00 PM LST, the PA option was used to quantify
374 changes in chemical processes for the grid cells and model layers shown in Fig. S6. For these
375 grid cells and layers, Fig. S7 shows the changes in final ozone concentrations compared to the
376 base case and the physical and chemical process rates that impact those concentrations. Table
377 S3 sums the key chemical processes for these hours. The increases in CCF emissions resulted
378 in a 100% increase in OH reactions with TERP producing intermediate oxidation products and
379 ultimately increasing OH production by 0.6%. As a result of this oxidation chemistry, there
380 was an increase of 0.9% in NO to NO₂ conversion by TRO₂ pathway, ultimately leading to a
381 0.1% increase in ozone production.

382 3.2.3 Ozone impact sensitivity

383 The maximum modelled daytime hourly ozone increase due to additional CCF
384 emissions occurred on July 18th. Using this day multiple sensitivity simulations were
385 performed, where CCF emissions from Denver County were incrementally increased up to
386 3,800 ton/year. Figure 10 shows the increase in terpene emissions from Denver County versus



387 the largest daily increase in hourly ozone concentrations. Figure 10A shows a linear
388 relationship, indicative of a VOC limited environment, where hourly ozone concentrations are
389 predicted to increase by 1 ppb for every 1,000 ton/year increase in TERP emissions during the
390 day, and 0.85 ppb at night. Also shown is the sensitivity to the MDA8 ozone where there is a
391 0.30 ppb increase for every 1,000 ton/year of TERP emissions. According to projected
392 emission inventories provided by the state of Colorado, the ozone non-attainment area was
393 expected to see reductions of 26.4% of NO_x and 24.6% of VOC emissions by the year 2017
394 (Environ, 2017). Under these reduced anthropogenic emission scenarios, Fig. 10B shows how
395 ozone would then respond to additional CCF TERP emissions. Figure 10B continues to show
396 a linear relationship, where hourly ozone concentrations are predicted to increase by 1.5 ppb
397 for every 1,000 ton/year increase in TERP emissions during the day, and 1.8 ppb at night. In
398 the future case, the MDA8 ozone increases by 0.38 ppb increase for every 1,000 ton/year of
399 TERP emissions. Therefore, Denver will still be VOC-limited and ozone is predicted to more
400 sensitive to CCF emissions of terpenes.



401 **4. Conclusion**

402 This study provides the first VOC emission inventory for the cannabis industry in the
403 U.S. Given the current state of knowledge of emission rates and growing practices, there are
404 considerable uncertainties in the basic parameters required to build such an inventory. Using
405 realistic bounds on each parameter, we developed seven scenarios, which resulted in estimated
406 emission rates that ranged over an order of magnitude. The highest emissions occur in Denver
407 County, with rates ranging between 36-362 metric tons/year for the different scenarios, from a
408 total of 66-652 metric tons/year across Colorado as a whole.

409 We included these additional terpene emissions in the Comprehensive Air Quality
410 Model with Extensions (CAMx), the model used by the state of Colorado for regulatory
411 monitoring and projections. Taking the worst case (3_EC) and median scenario (5_DPW) we
412 consider representative of current uncertainty upper boundary and future industry expansion;
413 we find that these projected increases in emissions lead to maximum increases in terpene
414 concentrations of up to 5.0 ppb. The largest impacts were seen in locations with the highest
415 terpene emissions coming from CCFs, i.e. in Denver County. We further found that these
416 increases in terpene concentrations affected the local atmospheric chemistry and air quality
417 with ground-level ozone concentrations increasing by as much as 0.34 ppb during the day and
418 0.67 ppb at night. In general, simulated nighttime increases were higher than those during the
419 daytime were, and we take the nighttime of July 27th – 28th as a case study to further investigate.
420 By applying process analysis (PA), following the evolving plume of VOCs and ozone, we find
421 that the initial reactions of the additional terpenes with OH, NO₃ and ozone result in increased
422 formation of peroxy radicals which increases the NO to NO₂ conversion rate; also removes
423 the NO_x to generate more NO_z product. This effectively reduces the loss of ozone by reaction
424 with NO, increasing the total ozone concentration.

425 We acknowledge, however, the considerable uncertainties that surround our projections
426 and call for the need for continued efforts to reduce these such that a more accurate assessment
427 of the regional air quality implications of this industry can be made. Future studies that include
428 ambient BVOC measurements are critical for comparisons with model predictions.
429 Additionally, in the model chemical mechanism more accurate and mechanistic representation
430 of terpene species is needed that can reflect the current cannabis emission composition.
431 Currently, the model surrogate “TERP”, which represents all monoterpene species in the
432 mechanisms, may not represent the precise rate constant for BVOC emissions from cannabis.



433 Further data are urgently required regarding CCF-specific information on plant counts and
434 weight by strain and growth stage, coupled with information about the agronomical practices
435 of cannabis cultivation in CCFs. Additional measurements of emission capacities of different
436 cannabis strains at different growth stages are also needed. Further, the emission inventory
437 version is for the year 2011; it may not be suitable to estimate the ozone impacts by the CCF
438 industry.

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



449 **Author contribution**

450 Chi-Tsan Wang and Dr. William Vizuete are lead researchers in this study responsible for
451 research design, experiments, analyzing results and writing the manuscript. Dr. Christine
452 Wiedinmyer and Dr. Kirsti Ashworth are also co-head researchers, and guided the research
453 design, assessed model results, and contributed to writing the manuscript. Dr. John Ortega, and
454 Dr. Peter Harley helped in collecting data and writing the manuscript. Dr. Quazi Z. Rasool
455 helped to analyze model results and contributed in writing the manuscript.

456

457 **Competing interests**

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

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663 **Tables**

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

| Name | <i>EC</i> | <i>DPW</i> | <i>PC</i> | |
|-------|-------------------------------------------|-----------------------------|-------------------|-------------------|
| | ($\mu\text{g gdw}^{-1} \text{hr}^{-1}$) | (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 |

667



668 **Table 2.** The estimated BVOC and total VOC emission rates (metric tons/year) for the base
 669 case (BC) scenario. Also shown are the increases in VOC emissions for all scenarios shown in
 670 Table 1 for Colorado, Denver County, Colorado Springs, Pueblo, and Boulder. The numbers
 671 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% |

672



673 **Table 3.** All data summed from July 27th, 9:00 PM LST to July 28th, 5:00 AM LST for grid
674 cells and layers shown in Fig. S4. The base case (BC) scenario column shows the absolute
675 predicted values and, the subsequent columns show the predicted changes due to emissions
676 from the 3_EC scenario. Percentages in parenthesis are the changes in 3_EC relative to BC.
677 Shown are the **(A)** total amount of VOC and TERP consumed due to oxidation (ppb), the **(B)**
678 total amount of hydroxyl radical (OH) and total peroxy radicals (TRO₂) that were generated
679 and their sources (ppb), and the **(C)** total amount of Nitrogen Dioxide (NO₂) and NO_x
680 termination products (NO_z) produced and their sources (ppb).

681 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%) |

682

683 B

| | BC | 3_EC |
|-----------------------------|------|---------------|
| OH generation | 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%) |

684

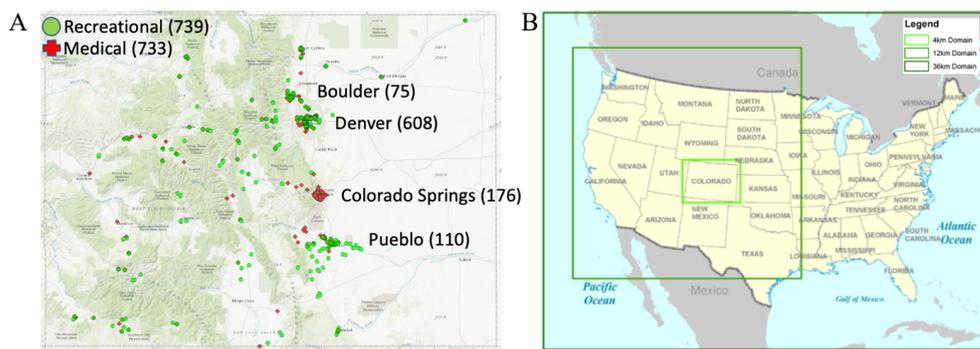
685 C

| | 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%) |

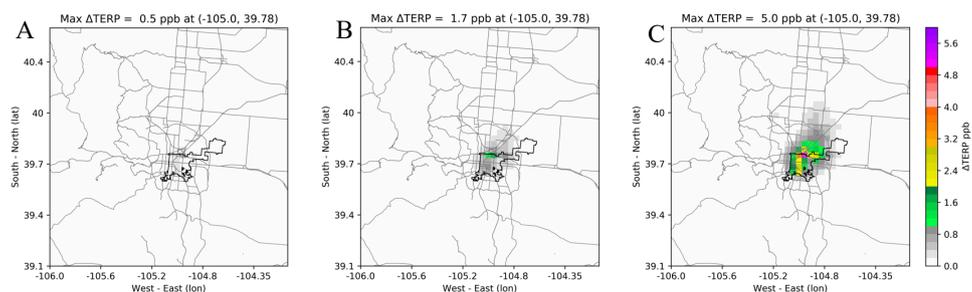
686



687 **Figures**



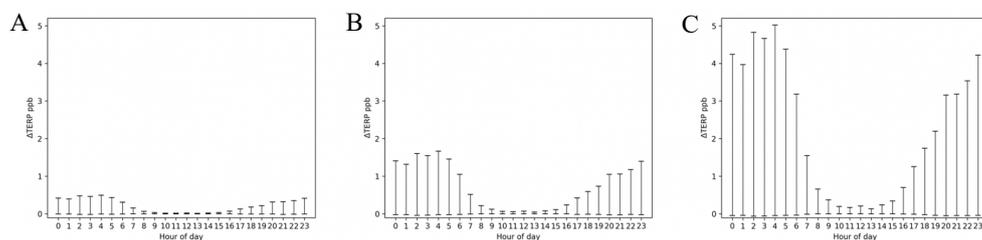
689 **Figure 1.** (A) The locations of medical (red) and retail (green) Cannabis cultivation facilities
690 (CCFs) in Colorado as of March 1, 2018. The corresponding values are the number of CCFs
691 found within each city. (B) The 36km × 36km resolution of Western Air Quality Model Study
692 (WAQS) and nested inner 12km × 12km resolution domains and 4km × 4km resolution domain
693 used by the Comprehensive Air Quality Model with Extensions (CAMx).
694



695

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

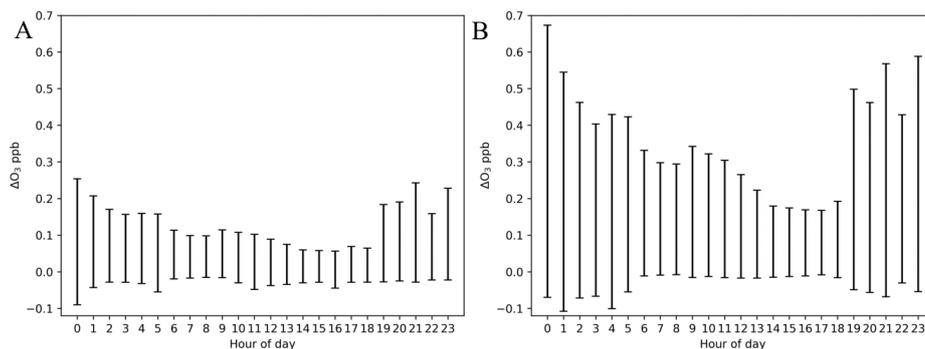
699



700

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

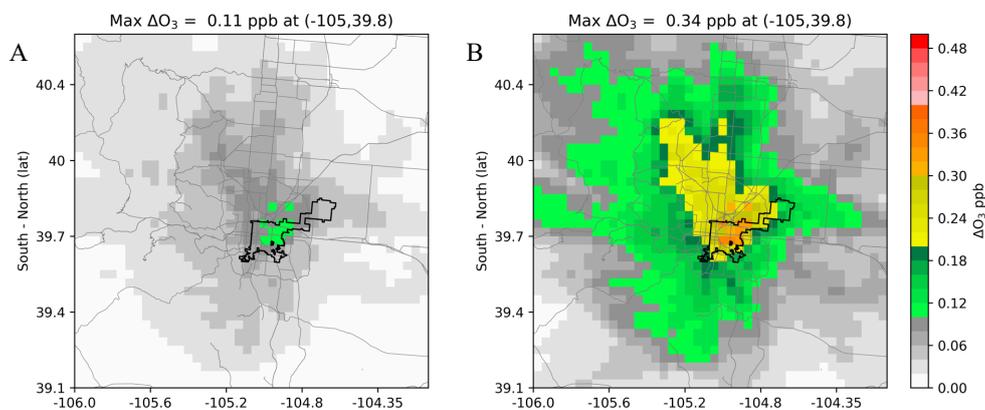
703



704

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

707

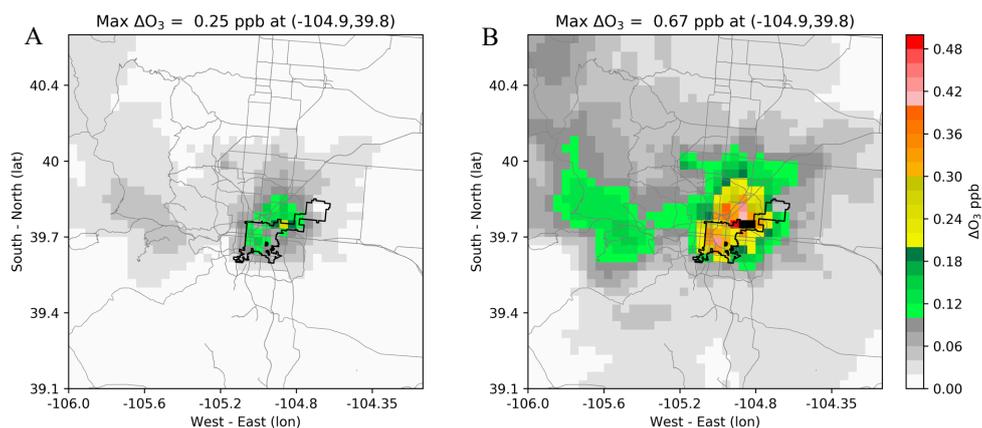


708

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

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

712



713

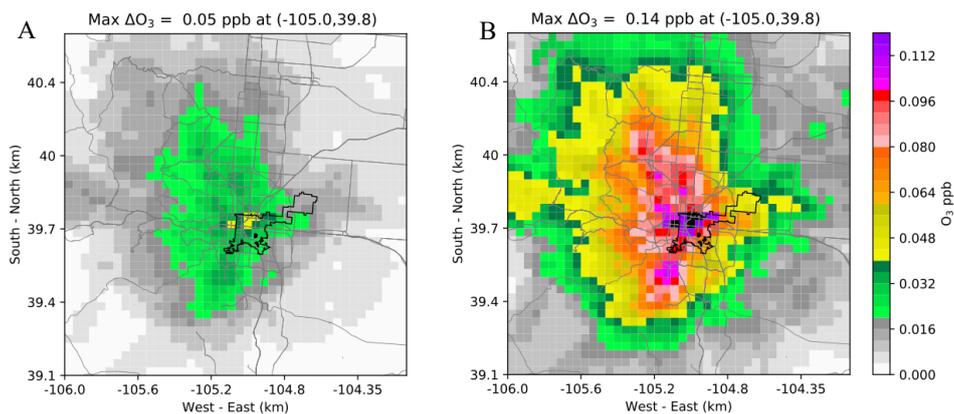
714 **Figure 6.** The predicted changes in hourly ozone concentrations for the Denver region from 6

715 PM – 6 AM LST for all 90 days of the simulation for the (A) 5_DPW and (B) 3_EC scenarios.

716 Black regions within the map indicate ozone increase values greater than 0.5 ppb. The grey

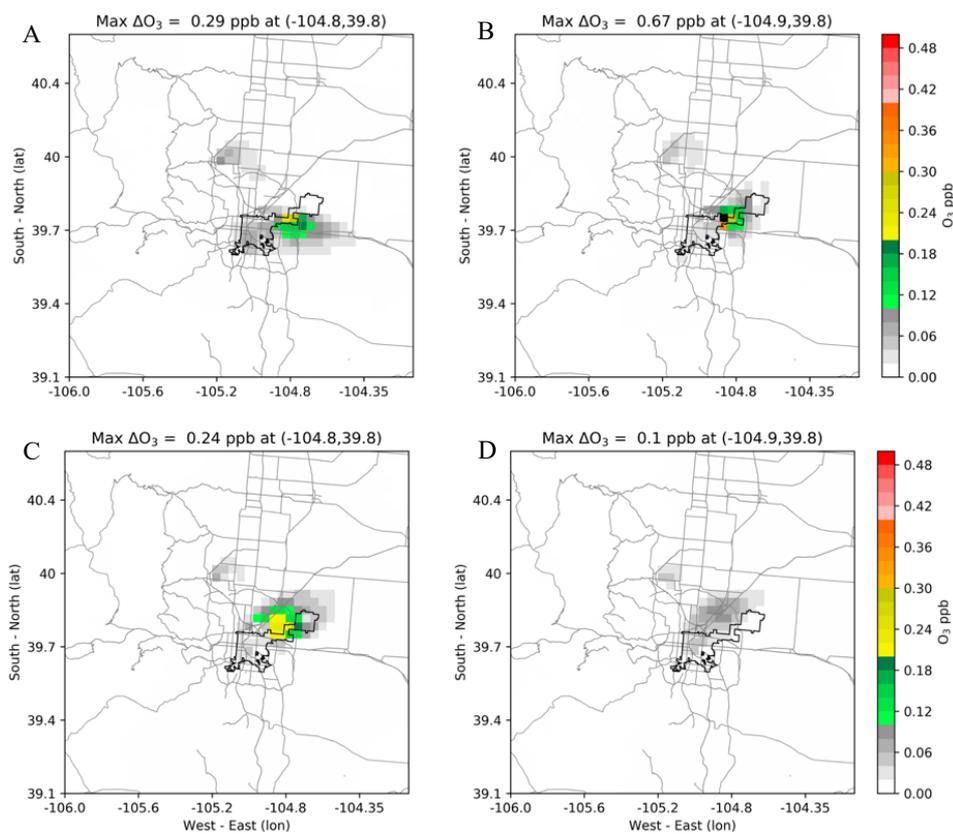
717 lines indicate major highways and the black line outlines Denver County.

718

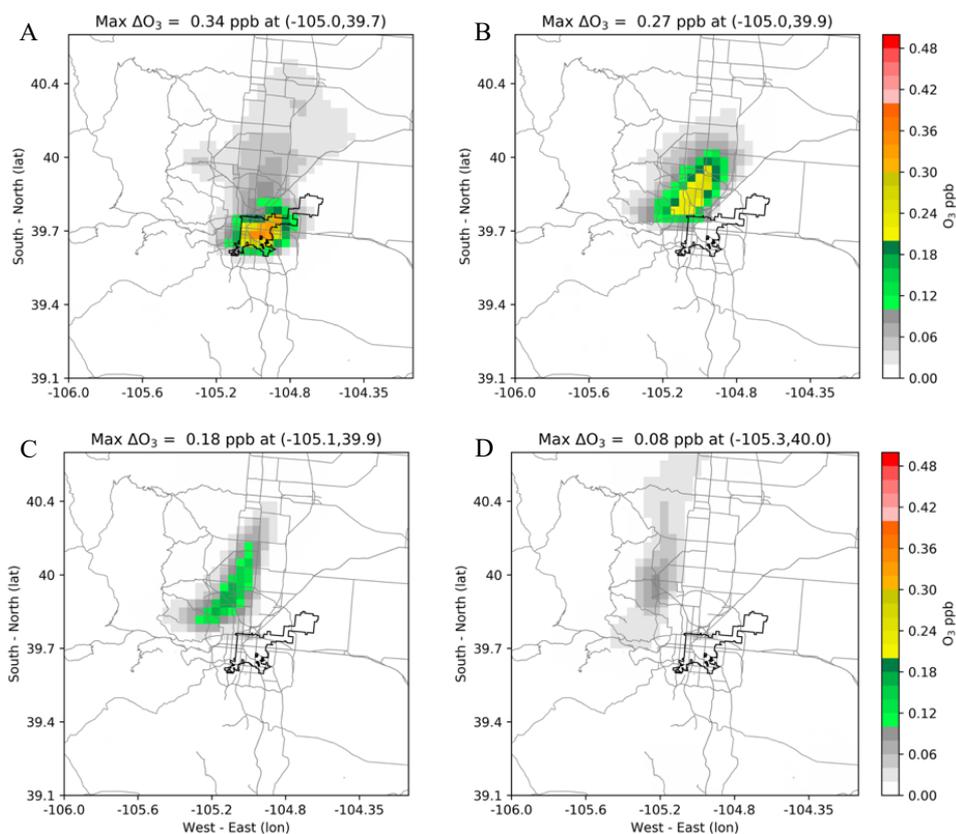


719

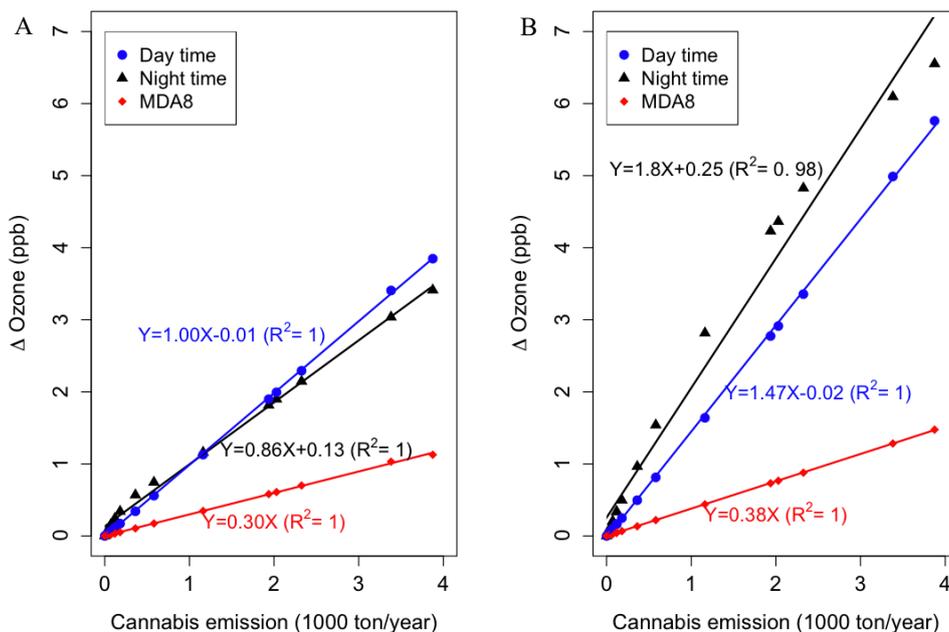
720 **Figure 7.** The predicted maximum increases in the maximum daily average 8-hour (MDA8)
721 ozone concentration (ppb) for the (A) 5_DPW and (B) 3_EC scenarios for the Denver region
722 over the 90-day simulation period. The black indicates ozone increase values greater than
723 0.12 ppb.



725 **Figure 8.** For the 3_EC scenario on July 28th, 2011, the largest hourly predicted ground level
726 ozone increases at **(A)** July 27th, 9 PM LST, and for July 28th, at **(B)** 0 AM LST (i.e. midnight),
727 **(C)** 3 AM LST and **(D)** 6 AM LST.



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



732

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

737