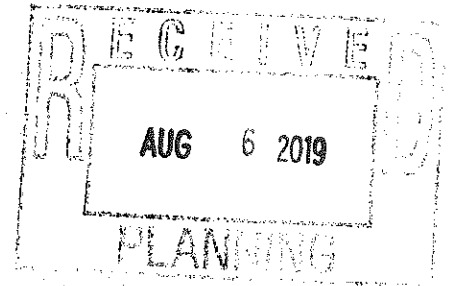


NEO Manufacturing LLC and NEO Cultivation LLC

4 Marc Road

Medway, Massachusetts

Odor Mitigation Plan



Specific odor-emitting activities:

- **Mother/ Clone Rooms:** These operations include the initial growing stage of new plant. The process emits plant terpenes into the atmosphere. Plants are moved from here to the Vegetative Rooms.
- **Vegetative Rooms:** These operations include the initial growing stage of new plant. The process emits plant terpenes into the atmosphere. Plants are moved from here to the Flower Rooms.
- **Flower Rooms:** At the time of harvest, the rooms will be emptied and thoroughly cleaned. The plants are physically moved to the Harvest Rooms in order to get product prepared for the drying and extraction processes.
- **Harvest Rooms:** During the harvest process, unusable parts of the plant are removed and placed in sealed containers. The usable parts of the plant are trimmed and prepared for drying or extraction and moved to Drying Rooms or Extraction Rooms.
- **Drying Rooms:** During the drying process moisture will be removed from the plants at which point plant terpene odors are released to the indoor environment.
- **Packaging Rooms:** this is the process of packaging the final product for sale at Dispensaries.

Odor Mitigation Best Practices

The following are the list of administrative controls and engineering controls that include, but not limited to:

- **Procedural activities:** Practicing extreme measures to isolate all odor emitting activities. These include, carbon filters installed in each room and isolating all odor producing activities in their own rooms that have heavy duty doors with door closers to ensure doors are always closed. In addition, we will install a state-of-the-art odor mitigation control systems. These procedures will be applied to the following odor-emitting areas of activity:
 - Mother/ Clone Rooms
 - Vegetative Room
 - Cultivation Rooms
 - Harvest Rooms
 - Drying Rooms
 - Package Rooms

Staff training procedures: NEO will have an extensive training program that include training specifically for odor mitigation. The importance of keeping doors shut, and changing carbon filters are among the Standard Operating Procedures that all employees must follow. NEO will conduct weekly staff meetings; at these meetings we discuss odor mitigation and discuss with all departments the importance of keeping up with the processes we have in place.

- **Monitoring and inspection:** Every odor emitting room will be continuously monitored with daily inspections for odor. If a high volume of odor is detected by an employee, they will directly inform the Facility Operator. If a filter needs to be changed it will be done so at this time. If doors are not closing by themselves, doors will be fixed as soon as the problem is detected. NEO will have a 2-month (or equivalent of 2 change outs per unit) supply of Carbon

Filters on site that will be re-ordered by the Facility Operator to keep aligned with the facility maintenance program.

Engineering Controls:

- **Drawings and Report:** The engineering odor control system will be designed by a Professional Engineer license in the State of Massachusetts.
- **Technical System Design and Equipment Installation:** HVAC system odor control plan: Closed Loop System with limited exhaust.
- **Odor Control** –The ions produced Ionization Air units, breaks down gases with electron-volt potential numbers below 12 to harmless compounds prevalent in the atmosphere such as oxygen, nitrogen, water vapor and carbon dioxide. The resultant compounds are a function of the entering contaminants into the plasma field. In this case the odors generated by the marijuana breaks down to carbon dioxide and nitrogen, and water vapor, thus eliminating the odor.
- **Reduction in Airborne Particles** –The positive and negative ions are drawn to airborne particles by their electrical charge. Once the ions attach to the particle, the particle grows larger by attracting nearby particles of the opposite polarity, thereby increasing the filtration effectiveness.
- **Odor Control** – The Active Carbon Filters absorb its molecular weight of contaminants it comes in contact with. Adsorption is a distinct process where organic compounds in the air react chemically with the activated carbon, which causes them to stick to the filter. The more porous the activated carbon is, the more contaminants it will capture. These filters are most notably used to remove terpene compounds in MIW facility, air handling systems.

Odor Mitigation System design

- **General:** All the HVAC systems installed at this facility will be considered “closed-loop” systems. Other than ventilation air, all the of the HVAC equipment will recirculate 100% of the supply being distributed to the various applications areas throughout the facility. Ionization and active carbon filtering will be installed to mitigate odors within the facility.
- **Office and Support Spaces:** Ventilation air will be provided as required for listed occupancy. The units will utilize polar Ionization units for odor and bacterial mitigation as well as active carbon filters installed in the return air.
- **Mother/ Clone Rooms:** Each mother/ clone rooms will have supplemental environmental control units installed to accommodate the cooling and dehumidification, monitoring and control for each room.
- **Vegetative Rooms:** Each vegetative room will have supplemental environmental control units installed to accommodate the cooling and dehumidification, monitoring and control for each room. Ventilation air will be provided as required for listed occupancy.
- **Cultivation Rooms:** Each cultivation room will have supplemental environmental control units installed to accommodate the cooling and dehumidification, monitoring and control for each room. Ventilation air will be provided as required for listed occupancy.

- **Drying Rooms:** Provide nominally sized vertical high-efficiency split- system AC units and dehumidification units with outdoor remote condensing unit(s). Ventilation air will be provided as required for listed occupancy.
- **Trimming Rooms:** Each vegetative room will have supplemental environmental control units installed to accommodate the cooling and dehumidification, monitoring and control for each room. Ventilation air will be provided as required for listed occupancy

Building Exhaust Systems:

- **Toilet Exhaust Fans:** The toilet exhaust fans will have active carbon rolled filter material installed on the fan inlets. The filters will be roll- type material secured to the fan inlet. Where possible pleated carbon filter and filter box will be installed on the fan inlet.
- **Cultivation Ventilation Fans:** The grow room ventilation fans will have active carbon rolled filter material installed on the fan inlets. The filters will be roll-type material secured to the fan inlet. Where possible pleated carbon filter and filter box will be installed on the fan inlet.
- **Service Sink Exhaust Fans:** The service sink exhaust fans will have active carbon rolled filter material installed on the fan inlets. The filters will be roll-type material secured to the fan inlet. Where possible pleated carbon filter and filter box will be installed on the fan inlet.
- **Misc. Exhaust Fans:** Other misc. exhaust fans will have active carbon rolled filter material installed on the fan inlets. The filters will be roll- type material secured to the fan inlet. Where possible pleated carbon filter and filter box will be installed on the fan inlet.

Note: The Extraction Process and Manufacturing Process are not considered to be an odor generating process all material is sealed prior to entering the room.

Extraction Rooms and Manufacturing rooms will also have installed Can-Light active carbon filters to operate as "scrubbers" the room. The Rooms Can-Light fans will have quantities sufficient to provide a minimum of 4 air-changes per hour.

Operational processes:

- **Mother Clone Rooms:** The existing air conditioning fan operates 24 hours per day. Bi-polar ionization units will be interlocked with the supply fan. The air conditioning units will also have active carbon filters installed on the return air section to each fan.
- **Vegetative Rooms:** The existing air conditioning fan operates 24 hours per day. Bi-polar ionization units will be interlocked with the supply fan. The air conditioning units will also have active carbon filters installed on the return air section to each fan.
- **Cultivation Rooms:** The existing air conditioning fan operates 24 hours per day. The Bi- polar ionization units will be interlocked with the supply fan. The air conditioning units will also have active carbon filters installed on the return air section to each fan.

- **Drying Room:** The supplemental air conditioning unit fan operates 24 hours per day. The Bi-polar ionization units are interlocked with the supply fan. The Can-light fans will operate 24 hours per day.
- **Trimming Rooms:** The existing air conditioning fan operates 24 hours per day. The Bi-polar ionization units will be interlocked with the supply fan. The air conditioning units will also have active carbon filters installed on the return air section to each fan.
- **Packaging Rooms:** The existing air conditioning fan operates 24 hours per day. The Bi-polar ionization units will be interlocked with the supply fan. The air conditioning units will also have active carbon filters installed on the return air section to each fan.

Product Testing and Performance Evaluation (Post Install)

- **Odor panel tests post installation:** During this phase and once first grow rooms come online Odor panel tests will be performed. Wind data and inputs for dispersion model validation will be recorded. Manufacturer and vendor onsite support will be provided during Odor panel tests. This compiled data will be reentered into dispersion model to validate original design criteria and document performance based upon Odor panel test.
- **Note:** This data will be shared with local and state officials to help develop best Practices for Odor Control and document ongoing compliance with Ordinance