



Operations Plan: West Manor

Type-6 Manufacturing & Type 11-Distribution

901 Palmetto Ave. Unit B

Pacifica CA 94044

westmanorwellness@gmail.com

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DISTRIBUTION PROCEDURES

INTRODUCTION & OBJECTIVE

West Manor is applying for a Type-6 Cannabis Manufacturing License and a Type-11 Distribution License. Upon issuance of any license, West Manor shall prominently display the license on the licensed premises where it can be viewed by state and local agencies.¹ West Manor intends to engage in the following licensed commercial cannabis activities as they relate to distribution: West Manor will transport cannabis goods between licensees, arrange for the testing of cannabis goods, conduct quality assurance reviews of cannabis goods to ensure compliance with all packaging and labeling requirements, and confirm that product is in final form and ready for retail sale prior to transferring product to a licensed retailer. West Manor will only engage in self-distribution by distributing products that have been manufactured and/or packaged by our distribution or manufacturing licenses.

West Manor will abide by all local and state regulations pertaining to the distribution and manufacturing of cannabis goods. All commercial cannabis activity shall be conducted between licensees. Should West Manor produce any cannabis goods designated “For Medical Use Only”, West Manor will ensure that all requirements prescribed by the State Department of Public Health in regulation are met and that these products shall only be sold to medicinal customers by M-designated retailers or M-designated microbusinesses authorized to engage in retail sales.²

DISTRIBUTION: PACKAGING, LABELING, AND PRE-ROLLS³

West Manor intends to use their distribution license to package, re-package, label, and re-label cannabis for retail sale. West Manor will not package, repackage, label, or re-label manufactured cannabis goods, with the exception of labeling and/or re-labeling manufactured cannabis goods packaging with the correct number of cannabinoids and terpenoids based on regulatory compliance testing results. West Manor will also process cannabis into pre-rolls that consist exclusively of any combination of flower, shake, leaf, or kief. Pre-rolls will be rolled and packaged prior to regulatory compliance testing.

¹ § 5039. License Posting Requirement.

² § 5032. Commercial Cannabis Activity.

³ § 5033. Packaging, Labeling, and Rolling.

Packaging shall meet all following requirements:

- The package shall protect the cannabis, including pre-rolls, from contamination and shall not expose the cannabis or pre-rolls to any harmful substance.
- The package shall be tamper-evident.
- If the package of cannabis or pre-rolls contains more than one serving, then the packaging shall be resealable.
- The package shall not imitate any package used for goods that are typically marketed to children.
- The package shall be child-resistant until the package is first opened. Child-resistant packaging should meet the requirements of the Poison Prevention Packaging Act of 1970 Regulations.⁴
- Any packaging that is child-resistant until the package is first opened shall be labeled with the statement “This package is not child-resistant after opening.”

DISTRIBUTION: TRANSPORTATION VEHICLES & PROCEDURES⁵

West Manor is in the process of securing a compliant distribution vehicle for the safe and proper transportation of cannabis and cannabis goods. Once a compliant distribution vehicle is secured, and before engaging in any transportation of cannabis or cannabis goods, West Manor will provide all vehicle and driver information to the City of Pacifica and State of California. All distribution vehicles and trailers used for transportation shall be owned or leased by West Manor. Until the proper distribution vehicle is secured, West Manor will utilize other licensed distributors to transport cannabis and cannabis goods to and from the licensed premises.

Cannabis goods shall be locked in a fully enclosed box, container, or cage that is secured to the inside of the vehicle or trailer. No portion of the enclosed box, container, or cage shall be comprised of any part of the body of the vehicle or trailer, including the vehicle’s trunk. Packages or containers holding cannabis goods shall not be tampered with, or opened, during transport. Non-cannabis goods will not be transported. Vehicles shall be equipped with an alarm system and other security features. If left unattended, vehicles and trailers shall be locked and secured. Vehicles and trailers containing cannabis goods will not be left unattended in a residential area or parked overnight in a residential area.

Prior to receiving any cannabis goods, West Manor will ensure that a shipping manifest has been generated using the California Cannabis Track-and-Trace (CCTT) system. Any distributors who do not yet have access to the Track-and-Trace system must transmit these manifests to West

⁴ (16 C.F.R. §1700.15(b)(1)) (Rev. July 1995)

⁵ § 5311. Requirements for the Transportation of Cannabis Goods.

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Distribution Type-11

Manor via email. Additionally, manifests must be sent to the Bureau at bcc@dca.ca.gov. Prior to transportation, West Manor will verify that the cannabis goods have been accurately reflected on the shipping manifest. Prior to transporting any cannabis goods, the originating distributor shall provide a completed sales invoice or receipt that meets all regulatory requirements. If any errors are noticed, West Manor contacts the originating distributor immediately to make necessary corrections before transport begins. Alterations to manifests and invoices cannot be made once transportation commences.

Distributors transporting cannabis goods shall only travel between licensees shipping or receiving cannabis goods and its own licensed premises when engaged in the transportation of cannabis goods. West Manor's distribution drivers shall not deviate from the travel requirements described in this section, except for necessary rest, fuel, or vehicle repair stops. West Manor will transport cannabis goods between their manufacturing and distribution licenses within the same building. In these instances, West Manor Distribution may transport cannabis goods by foot, hand truck, fork lift, or other reasonable means, with the requisite shipping manifest.

VEHICLE INFORMATION⁶

West Manor understands that vehicles and trailers transporting cannabis goods are subject to inspection by the Bureau at any licensed premises or during transport at any time. Prior to engaging in transportation of cannabis goods, West Manor will provide the following required information to local and state regulators:

1. Proof that West Manor is the registered owner for each distribution vehicle used to transport cannabis goods.
2. The year, make, model, license plate number and Vehicle Identification Number (VIN) for each vehicle and/or trailer used to transport cannabis goods.
3. Proof of insurance for each vehicle and/or trailer used to transport cannabis goods.

This information shall be provided in writing for any new vehicle and/or trailer prior to using it for the transportation of cannabis goods. Any changes to this information will be submitted in writing to the city and to the Bureau within 30 calendar days.

DISTRIBUTION DRIVER INFORMATION⁷

West Manor will hire distribution drivers and transport personnel that meet all local and state requirements. West Manor will only employ personnel over the age of 21 to drive or otherwise occupy a commercial vehicle or trailer transporting cannabis goods. Only West Manor

⁶ § 5312. Transport Vehicle Information.

⁷ § 5313. Transport Personnel Requirements.

employees or security personnel will be permitted in the distribution vehicle(s). Prior to an employee engaging in the transportation of cannabis goods, West Manor shall provide the City and State with the driver's name and age, driver's license number, and roles and responsibilities of that employee.

TRACK-AND-TRACE REQUIREMENTS⁸

West Manor understands that it will be held accountable for all actions its owners or employees take while logged into or using the track-and-trace system, or otherwise while conducting track and trace activities. West Manor shall only enter and record complete and accurate information into the track and trace system, and shall correct any known errors entered into the track and trace system immediately upon discovery. If at any point West Manor loses connectivity to the track-and-trace system for any reason, we will notify the City of Pacifica and the Bureau immediately, providing comprehensive records detailing all commercial cannabis activities that were conducted during the loss of connectivity.⁹

West Manor will create and maintain an active and functional account within the state-mandated track-and-trace system prior to engaging in any commercial cannabis activity, including the purchase, sale, test, packaging, transfer, transport, return, destruction, or disposal, of any cannabis goods. West Manor will designate an account manager to successfully complete all required track and trace system training, maintain all records pertaining to the track-and-trace-system, monitor all compliance notifications from the track and trace system, and timely resolve the issues detailed in the compliance notification. If West Manor is unable to resolve a compliance notification within three business days of receiving the notification, the licensee shall notify the Bureau immediately.

Shipping manifests must accompany every transport of cannabis goods. West Manor will generate Shipping Manifests and satisfy all track-and-trace requirements for cannabis activities including, but not limited to: testing and sampling, sale of cannabis goods to a licensee, destruction or disposal of cannabis goods. West Manor will not take into possession or transport any goods not listed on the shipping manifest or any goods that are less than or greater than the amount reflected on the shipping manifest.¹⁰

⁸ § 5048. Track and Trace System.

⁹ § 5050. Loss of Connectivity.

¹⁰ § 5314. Shipping Manifest.

STORAGE-ONLY SERVICES¹¹

West Manor may provide storage-only services only for products manufactured by West Manor Manufacturing. West Manor will not provide storage-only services for products related to the quality assurance and laboratory testing processes to other licensees. Storage-only services may only be provided for cannabis goods that are packaged as they will be sold at a retailer, cannabis accessories, and a licensees' branded merchandise or promotional materials made in collaboration with West Manor only. West Manor will not store immature cannabis plants, with the exception for seeds.

INVENTORY STORAGE & CONTROL

West Manor's inventory procedures and internal inventory records will allow us to account for all inventory and be able to provide the Bureau and other regulating entities with the status of each cannabis goods batch in West Manor's possession. West Manor shall at all times carry and maintain commercial general liability insurance meeting or exceeding regulatory requirements. The policy covers an aggregate amount no less than \$2,000,000 and an amount no less than \$1,000,000 for each loss. West Manor shall provide the Bureau with proof of such insurance coverage, and promptly notify the Bureau of any changes. Should West Manor experience any lapse in insurance coverage, we will notify the Bureau within 14 days.¹²

All inventory records shall be retained for a minimum of seven (7) years.¹³ All inventory stored on West Manors premises shall be secured in a limited-access area. At no time will cannabis or cannabis goods be stored outdoors. Inventory storage areas are kept separate from all employee break rooms, changing facilities, and bathrooms.¹⁴ All packages and/or storage containers of cannabis goods shall protect the cannabis from contamination.

In addition to other inventory control systems West Manor shall conduct reconciliations of the physical inventory of cannabis goods at the licensed premises with the records in the track-and-trace database at least once every 30 calendar days. If West Manor finds a significant discrepancy between its physical inventory and the track and trace system database, West Manor shall conduct an audit, review video footage, and notify the Bureau of any reportable activity within 24 hours of such discovery. Significant discrepancies in inventory are defined as a difference in actual inventory compared to inventory records with a difference of at least 3 percent of West Manor's average monthly sales, calculated based on the average total of sales

¹¹ § 5301. Storage Services.

¹² § 5308. Insurance Requirements.

¹³ § 5037. Record Retention.

¹⁴ § 5303. Storage of Inventory.

from the previous 6 months.¹⁵ Additionally, if West Manor discovers diversion, theft, loss, or any other criminal activity, West Manor shall notify the Bureau and local law enforcement within 24 hours of discovery.¹⁶

INVENTORY INTAKE¹⁷

West Manor Distribution shall accept or reject, in whole, shipments of cannabis goods. West Manor shall record the acceptance or rejection of cannabis goods within the track-and-trace system. In the following circumstances, West Manor will reject a portion of a transfer:

- West Manor may reject the portion of the shipment that is not accurately reflected on the manifest, sales invoice, or receipt.
- West Manor may reject a portion of the shipment if the shipment contains cannabis goods that were damaged during transportation.
- West Manor may reject a portion of a shipment containing cannabis goods that are non-compliant with labeling requirements, or exceeds its provided expiration date.

BATCH STORAGE¹⁸

West Manor will use their distribution license to arrange for lab testing of cannabis and cannabis goods. West Manor will ensure that batches awaiting lab testing are stored separately and distinctly from other cannabis goods batches and are properly labeled so they can be easily identified.

Upon intake, product is labeled with the following information physically affixed to the outside of the container:

1. The name, license number, and licensed premises address of the licensed manufacturer or licensed cultivator who provided the batch.
2. The date of entry into West Manor's storage area.
3. The unique identifier(s) and batch number(s) associated with the product.
4. A description of the cannabis goods.
5. The weight and/or quantity of units in the batch.
6. The best-by, sell-by, or expiration date of the batch, if applicable.

¹⁵ § 5304. Significant Discrepancy in Inventory.

¹⁶ § 5306. Notification of Theft, Loss, and Criminal Activity.

¹⁷ § 5052.1. Acceptance of Shipments.

¹⁸ § 5309. Inventory Accounting.

West Manor shall ensure that all cannabis goods batches in “Quarantine” are stored separately and distinctly from other cannabis goods batches on the licensed distributor’s premises.¹⁹

Additionally, all product in storage will be labeled to include the following information:

- Quarantine: The batch is awaiting sampling for regulatory compliance testing
- Quarantine: The batch has been sampled and is awaiting testing results
- Quarantine: Awaiting destruction or remediation due to failed testing
- Non-Quarantine: The batch has passed testing
- Non-Quarantine: The batch is being stored or held for any other lawful purpose.

COMPLIANCE TESTING

After taking physical possession of a cannabis goods batch, West Manor will contact a licensed laboratory testing facility to arrange for a lab technician to come and take a representative sample of the batch to be tested.²⁰ An employee of West Manor will be physically present to ensure that the batch size from which the sample is taken meets all regulatory requirements, but no time will any employees of West Manor have access to any of the testing equipment or tamper with the cannabis or cannabis goods during the sampling process. After the sample has been selected, a West Manor employee and the laboratory employee shall both sign and date the chain of custody form, attesting to the sample selection having occurred.²¹

The sampling shall be video recorded with the batch number stated verbally or in writing on the video at the beginning of the video and a visible time and date indication on the video recording footage. West Manor shall retain video recordings for a minimum of 90 calendar days. Once a sample from a batch has been obtained for regulatory compliance testing, West Manor will not arrange for the re-sampling of the same batch without authorization from the Bureau.²² Products awaiting test results will be stored in “Quarantine” and will not be accessed until a passing COA is received from the testing laboratory.

If the batch passes the compliance testing, the cannabis goods may then be transported to one or more retailers or another licensed distributor. If the batch fails the compliance testing, West Manor must destroy the batch or submit a satisfactory remediation plan from a licensed manufacturer to the Bureau within 30 days of receiving the failed test result.²³

¹⁹ § 5302. Storage of Batches for Testing.

²⁰ § 5304. Testing Arrangements.

²¹ § 5305. Testing Sample.

²² § 5305.1 Re-sampling.

²³ § 5306. Laboratory Testing Results.

CERTIFICATE OF ANALYSIS

When West Manor Distribution receives a Certificate of Analysis (COA) for regulatory compliance testing from the licensed testing laboratory, or upon transfer from another licensed distributor stating that the batch meets specifications required by law, the licensed distributor shall ensure the following before transporting the cannabis goods:

- The cannabis goods should be packaged as they will be sold at retail,
- The COA corresponds to the correct batch
- The date on the COA is less than 12 months old
- The label on the cannabis goods is consistent with the COA regarding cannabinoid content and contaminants required to be listed by law
- The cannabis goods have not exceeded their expiration or sell-by date (if applicable)
- All events prior to receipt of the certificate of analysis for regulatory compliance testing have been entered into the track and trace system.²⁴
- West Manor shall ensure that all cannabinoids, THC content, and/or CBD content claimed to be present on a label shall not be considered inaccurate if the difference in percentage on the certificate of analysis is plus or minus 10.0%.
- West Manor shall ensure that any terpenoid content claimed to be present on the label shall not be considered inaccurate if the difference in percentage on the certificate of analysis is plus or minus 10.0%.²⁵

Only cannabis and cannabis goods that have passed compliance testing, have an accompanying COA, and are packaged as they will be sold at retail will be transferred by West Manor to one or more licensed distributors, licensed retailers, or licensed microbusinesses authorized to engage in distribution and/or retail.

DESTRUCTION & DISPOSAL OF CANNABIS GOODS

If cannabis goods are being destroyed or disposed of, the destruction shall be performed under video surveillance. Prior to final disposal, all cannabis goods must be destroyed and rendered unusable and recognizable in accordance with local and state regulations.²⁶ West Manor shall record the destruction in our internal waste log as well as in the track-and-trace system with the following additional information:

- The name of the employee performing the destruction or disposal.

²⁴ § 5307. Quality-Assurance Review.

²⁵ § 5307.1 Quality-Assurance Review for Labeling Cannabinoids and Terpenoids.

²⁶ § 5054. Destruction of Cannabis Goods Prior to Disposal.

- The reason for destruction and disposal.
- The entity disposing of the cannabis waste.

All transactions will be entered into the track-and-trace system within 24 hours of occurrence.

Notes will be included in the track-and-trace system with a description for any adjustments made, including, but not limited to:

- Spoilage or fouling of the cannabis goods
- Any event resulting in damage, exposure, or compromise of the cannabis goods
- Any other applicable information

RETURNS OF CANNABIS GOODS²⁷

West Manor will not accept the return of cannabis goods with a few exceptions. If West Manor discovers that a manufactured cannabis good that was purchased from another licensee is defective, West Manor will contact the selling licensee and arrange to return the manufactured cannabis good only in exchange for a non-defective version of the same type of manufactured cannabis good or in exchange for a manufactured cannabis good of equal value. If West Manor discovers that a cannabis good manufactured by West Manor is found defective, West Manor will contact all purchasing licensees and arrange for the return of the manufactured cannabis good only in exchange for a non-defective version of the same type of manufactured cannabis good or in exchange for a manufactured cannabis good of equal value.

RECORD RETENTION²⁸

West Manor shall keep and maintain the following legible records related to commercial cannabis activity for at least seven years.²⁹ Records shall be stored in a secured area where the records are protected from debris, moisture, contamination, hazardous waste, fire, and theft.

- Inventory logs and records
- Records relating to branding, packaging and labeling
- Quality-Assurance Records
- Laboratory-Testing records
- Employee training records
- Contracts with other licensees regarding commercial cannabis activity

²⁷ § 5053. Returns Between Licensees.

²⁸ § 5310. Records.

²⁹ § 5037. Record Retention.

- Permits, licenses, and local authorizations to conduct West Manor’s commercial cannabis activity.
- Vehicle and trailer ownership records
- Security records
- Records pertaining to the destruction or disposal of cannabis goods
- Records relating to data entered into the track-and-trace system including transportation bills of lading, warehouse receipts, and shipping manifests
- Records relating to taxes, payments, and collections
- All other documents prepared or executed by an owner or their employees or assignees

ADVERTISING & BRANDED MERCHANDISE

West Manor does not currently intend on launching any advertising campaigns or creating any branded merchandise. Prior to any advertising or marketing from West Manor involving direct, individualized communication or dialogue, the licensee shall use age affirmation to verify that the recipient is 21 years of age or older. West Manor shall utilize a method of age affirmation before engaging in any communication, including in-person, telephone, physical mail, or electronic.³⁰ Additionally, West Manor will abide by all state requirements outlined in § 5040. Advertising Placement. West Manor shall not advertise any free cannabis goods or giveaways, contests, sweepstakes, or raffles.

If West Manor wishes to sell branded merchandise, West Manor will seek written approval from the Bureau by submitting a written request and a photograph of the branded merchandise either by mail or by email to bcc@dca.ca.gov.³¹

PROHIBITED ITEMS

West Manor does not purchase, sell, or store in inventory any items containing tobacco, tobacco products, alcohol, or other controlled substances. Possession of any such items on the premises is strictly prohibited.

³⁰ § 5041. Age Confirmation in Advertising.

³¹ § 5041.1 Branded Merchandise Approval.

MANUFACTURING PROCEDURES

INTRODUCTION & OBJECTIVE

West Manor is applying for a Type-6 Cannabis Manufacturing License and a Type-11 Distribution License. Upon issuance of any license, West Manor shall prominently display the license on the licensed premises where it can be viewed by state and local agencies.³² West Manor Manufacturing will develop and use detailed procedures throughout our operations to ensure quality and maintain consistency throughout the manufacturing processes. These procedures will include measures for inventory control, quality control, transportation, security, and cannabis waste disposal. Descriptions of these procedures, called Standard Operating Procedures (SOPs), will be submitted with local and state applications.

West Manor Manufacturing intends to use Good Manufacturing Practices (GMPs) and understand these protocols must be followed to ensure production occurs in a sanitary and hazard-free environment, and guarantees cannabis products are contaminant-free with consistent THC levels meeting required limitations.

MANUFACTURING ACTIVITIES

West Manor will be working with local brands and other California companies to provide “white labeling” services. With the ability to distribute the products manufactured in-house, West Manor will present a competitive advantage for all brands and companies we represent. West Manor intends to form strategic partnerships and provide services for licensed cultivators and Type-7 Manufacturers. By collaborating through partnerships and contractual agreements, West Manor will be providing services to produce cannabis products from raw materials in order to fulfill client needs while working in compliance with local and state laws.

West Manor will acquire raw material and crude cannabis extracts from Type-7 Manufacturers for further processing. West Manor’s operations include removing all unwanted byproducts, such as fats, lipids, waxes, residual solvents, as well as any and all residual plant matters from cannabis extracts purchased from a state licensed Type 7 Manufacturer.

³² § 5039. License Posting Requirement.

MANUFACTURING TECHNIQUES

West Manor will be performing cannabis extraction using only mechanical means or thermal separation.³³ West Manor will not utilize any extraction methods that require any type of solvent; all material that requires chemical extraction will be procured from a Type-7 license. West Manor will not utilize chemical extractions in any process. West Manor will not perform any extraction using volatile or non-volatile solvents.

West Manor will engage in the following manufacturing activities:

- Mechanical extraction
- Heat Rosin and other proprietary solventless extractions methods
- Dry ice separation (thermal)
- Roto-vape molecular separation for recovery of terpenes and cannabinoids
- Thin Wipe distillation
- Crystallizing of cannabinoids (THC-A and other cannabinoids)
- Infusion
- Rolling pre-rolled cannabis joints with or without kief, hash, concentrates, distillate, terpenes, or any other form of smokable cannabis products.

West Manor will NOT be winterizing crude oils to remove unwanted impurities using ethanol. Our methods may change due to advancements in our research and developments.

MANUFACTURED PRODUCTS

West Manor will have a wide range of products to meet the huge demand of consumers needs. These products will range from:

1. Cannabis Flowers: Packaged in industry standard increments gram eighths quarters half ounces and full ounces for consumer uses. Larger packaging can be done for cultivators' manufacturers or distributors quarter pound half pound full pound or any weight needed to fulfil the needs of cannabis businesses. All of these products can be sold as a private label or sold under any brand name that partners with West Manor.
2. Pre-Rolled Cannabis Joints: These products will be manufactured with or without kief, hash, concentrates, distillate, terpenes, or any other form of smokable cannabis products. Private labeling co-branding and West Manors own brands will be available to purchase through our inhouse distribution or other partnering distribution companies.
3. Cannabis Kief, Hash, Concentrates, Distillate, Terpenes, or any other form of cannabis products. Made inhouse or purchased for repacking or co-packaging to be sold as private

³³ §40220. Permissible Extractions.

label branded or West Manors own brand. All products will be manufactured following all local and state laws to ensure compliance.

4. Infused Cannabis Products³⁴: Edibles, topicals, sublinguals, transdermals, suppositories, smokable products, or any other infused cannabis goods. These will range from but not limited to candies, tinctures, capsules, patches, gums, rubs, salves, lotions, oils and Infused rolling products. All products will be made inhouse or purchased for repackaging or co-packaging to be sold as private label branded or West Manors own brand. All products will be manufactured following all local and state laws to ensure compliance.
5. Vaporizer Cartridges: West manor will manufacture its own mechanical method extracts to fill vaporizer cartridges and other containers used to store the products used for the purpose of selling them on the retail market. West Manor will also use its own inhouse distillate terpenes or any other types of cannabinoids to fill cartridges as well as buy the necessary products needed from other manufactures, cultivators or distributors.
6. New products: West Manor will develop new products as we learn and adapt to new techniques. All products listed above may change due to market supply and demand. Some products may not be listed because they have not yet been conceptualized. This will be included as Research & Development as part of West Manor's product development plan.

HAZARDOUS MATERIALS

Safety is of the utmost importance to West Manor. West Manor's manufacturing plan includes the usage of certain hazardous or flammable materials including isopropyl alcohol, hydrogen peroxide, bleach, and dry ice. Procedures for the usage and proper storage of all materials considered to be hazardous will be provided to employees and local and state officials as required. A complete, updated list of materials kept on-site will be made available to the City of Pacifica and the Bureau. Additionally, West Manor will maintain Material Safety Data Sheets for any material stored on the premises.

A detailed Health and Safety Plan will be provided to ensure the safety of the public as well as West Manor's employees. Within one year of hiring our first employee, West Manor will have a manager complete the state-required 30-hour OSHA Occupational Hazard Training Course and develop a full Injury and Illness Prevention Plan and Employee Training Program.³⁵ West

³⁴ All food products, food storage facilities, food-related utensils, equipment and materials shall be approved, used, managed and handled in accordance with all California Health and Safety Codes and California Retail Food Codes. All food products shall be protected from contamination at all times, and all food handlers must be clean, in good health and free from communicable diseases.

³⁵ § 5002. Annual License Application Requirements.

Manor's Health and Safety Plan will include procedures related to the following:

- I) Personal Protective Equipment
- II) Facility Protection Systems: fire suppression system, alarm systems, hazardous gas detection systems
- III) Emergency Response Plan
- III) Emergency Evacuation Plan (Posted)
- IV) Hazardous Materials On-Site
- V) Employee Training Materials
- VI) Injury & Illness Prevention Plan

DRY ICE

Dry ice, or solid carbon dioxide, is considered a hazardous material. Therefore, a Material Safety Data Sheet is attached as an appendix to these operating procedures. Systems and equipment related to the handling, storage, and disposal of dry ice must be operated and inspected in accordance with the specific manufacturer's safety and operating instructions. Procedures for the storage, handling, and usage of dry ice is detailed below.

Storage.

Dry Ice will be stored in an insulated container. Dry Ice will never be stored in a completely airtight container. The sublimation of Dry Ice to Carbon Dioxide gas will cause any airtight container to expand or possibly explode. Dry Ice will never be stored in unventilated rooms, cellars, autos or boat holds. The sublimated Carbon Dioxide gas will sink to low areas and replace oxygenated air. This could cause suffocation if breathed exclusively. Dry Ice will not be stored in a refrigerator freezer.

1. Dry ice is to be stored in well-ventilated locations. Dry ice will be placed in a special, insulated cooler designed for the storage of dry ice.
2. To avoid a pressure explosion, dry ice must NEVER be stored in any type of tightly sealed devices such as an ultra-low freezer or plastic/glass container.
3. Storage and operation locations must be periodically surveyed to ensure carbon dioxide levels remain below 5000 ppm. A trigger system will be installed as a precaution.

Hazards & Precautions

1. Eye and skin irritations
2. Harmful if inhaled or absorbed through the skin
3. Harmful if ingested and enters airways
4. Cryogenic burns/frostbite
5. Suffocation: Displacing oxygen
6. Increase Respiration and heart rate
7. Explosions when stored improperly
8. Carbon dioxide build-up in enclosed areas

Required Personal Protective Equipment

- Respiratory Protection
- Ventilation
- Protective Gloves: Loose fitting/impermeable (leather)
- Eye Protection: Safety glasses

First Aid & Safety Measures

West Manor will have no more than 20 pounds of dry ice on the premises at any given time. Preventative measures are in place to prevent the mishandling of dry ice, but small spills are a possibility. In the event of a spill, containers should be removed from the spill area.

Material will be vacuumed or swept up and placed in a designated, labeled waste container. Disposal will be made via a licensed waste disposal contractor.

Material Safety Data Sheets will be made readily available to first responders in the event of an emergency. First responders are instructed to wear proper personal protective equipment.

If someone has been exposed to dry ice, a description of necessary first aid measures are outlined below:

- Eye Contact: Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Get medical attention if irritation occurs.
- Inhalation: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Get medical attention if symptoms occur.
- Skin Contact: Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Get medical attention if symptoms occur.
- Ingestion: Wash out mouth with water. Remove the victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Do not

induce vomiting unless directed to do so by medical personnel. Get medical attention if symptoms occur.

Proper Disposal of Dry Ice

- When treated properly, dry ice does not produce any hazardous waste
- Let unused portion sublimate in well-ventilated locations over a period of several days
- NEVER dispose of dry ice in a sink, toilet, or other drain.
- NEVER dispose of dry ice in the trash or garbage.
- NEVER place unneeded dry ice in corridors that may not be well ventilated

CANNABIS WASTE PROCEDURES

It is the responsibility of West Manor to properly evaluate waste to determine if it should be designated and handled as a hazardous waste³⁶. West Manor will dispose of any cannabis waste in a secured waste receptacle or secured area on the licensed premises. All cannabis will be removed from any outside packaging, weighed and recorded, and rendered unusable and unrecognizable before being disposed of. For the purposes of this section, “secured waste receptacle” or “secured area” means that physical access to the receptacle or area is restricted to the licensee, employees of the licensee, the local agency, waste hauler franchised or contracted by the local agency, or private waste hauler permitted by the local agency only. Public access to the designated receptacle or area shall be prohibited. Cannabis waste areas are kept under 24-hour video surveillance on the license premises until final disposal can be made.

EMPLOYEES AND HOURS

West Manor is currently operated by one (1) person: Florinda K. Cardenas. In the future, West Manor will hire more employees, contractors, and volunteers. All persons working for West Manor must be of at least 21 years of age³⁷ and will undergo background checks before engaging in any commercial cannabis activities. Employee badge requirements are outlined in West Manor’s Security Plan. West Manor will operate 24 hours a day.

³⁶ Public Resources Code 40141

³⁷ § 5031. Age Restriction.

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Distribution Type-11

MEDICAL & ADULT-USE DESIGNATION

West Manor will operate as both Medical and Adult use. All products made will be made for both types of use.

SAFETY DATA SHEET

Carbon Dioxide, Solid or Dry Ice

Section 1. Identification

GHS product identifier : Carbon Dioxide, Solid or Dry Ice
Chemical name : Carbon dioxide, solid
Other means of identification : Dry ice; carbonic anhydride
Product type : Solid.
Product use : Synthetic/Analytical chemistry.
Synonym : Dry ice; carbonic anhydride
SDS # : 001091
Supplier's details : Airgas USA, LLC and its affiliates
259 North Radnor-Chester Road
Suite 100
Radnor, PA 19087-5283
1-610-687-5253
24-hour telephone : 1-866-734-3438

Section 2. Hazards identification

OSHA/HCS status : Not classified.
Classification of the substance or mixture : Not classified by Globally Harmonized System of Classification and Labeling (GHS).

GHS label elements

Signal word : Warning
Hazard statements : May displace oxygen and cause rapid suffocation.
May increase respiration and heart rate.
May cause frostbite.

Precautionary statements

General : Read label before use. Keep out of reach of children. If medical advice is needed, have product container or label at hand.
Prevention : Not applicable.
Response : Not applicable.
Storage : Not applicable.
Disposal : Not applicable.
Hazards not otherwise classified : Contact with cryogenic liquid can cause frostbite and cryogenic burns.

Section 3. Composition/information on ingredients

Substance/mixture : Substance
Chemical name : Carbon dioxide, solid
Other means of identification : Dry ice; carbonic anhydride
Product code : 001091

CAS number/other identifiers

CAS number : 124-38-9

Ingredient name	%	CAS number
Carbon Dioxide	100	124-38-9

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

Section 3. Composition/information on ingredients

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

- Eye contact** : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Get medical attention if irritation occurs.
- Inhalation** : Remove victim to fresh air and keep at rest in a position comfortable for breathing. Get medical attention if symptoms occur.
- Skin contact** : Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Get medical attention if symptoms occur.
- Ingestion** : Wash out mouth with water. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Do not induce vomiting unless directed to do so by medical personnel. Get medical attention if symptoms occur.

Most important symptoms/effects, acute and delayed

Potential acute health effects

- Eye contact** : May cause eye irritation.
- Inhalation** : May be harmful if inhaled. May cause respiratory irritation.
- Skin contact** : Harmful if absorbed through the skin. May cause skin irritation.
- Frostbite** : Try to warm up the frozen tissues and seek medical attention.
- Ingestion** : May be harmful if swallowed and enters airways.

Over-exposure signs/symptoms

- Eye contact** : No specific data.
- Inhalation** : No specific data.
- Skin contact** : No specific data.
- Ingestion** : No specific data.

Indication of immediate medical attention and special treatment needed, if necessary

- Notes to physician** : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.
- Specific treatments** : No specific treatment.
- Protection of first-aiders** : No action shall be taken involving any personal risk or without suitable training.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

- Suitable extinguishing media** : Use an extinguishing agent suitable for the surrounding fire.
- Unsuitable extinguishing media** : None known.

Specific hazards arising from the chemical : No specific fire or explosion hazard.

- Hazardous thermal decomposition products** : Decomposition products may include the following materials:
carbon dioxide
carbon monoxide

Section 5. Fire-fighting measures

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Put on appropriate personal protective equipment.

For emergency responders : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill : Move containers from spill area. Vacuum or sweep up material and place in a designated, labeled waste container. Dispose of via a licensed waste disposal contractor.

Large spill : Move containers from spill area. Prevent entry into sewers, water courses, basements or confined areas. Vacuum or sweep up material and place in a designated, labeled waste container. Dispose of via a licensed waste disposal contractor. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures : Put on appropriate personal protective equipment (see Section 8).

Advice on general occupational hygiene : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities : Store in accordance with local regulations. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. See Section 10 for incompatible materials before handling or use.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Section 8. Exposure controls/personal protection

Ingredient name	Exposure limits
Carbon Dioxide	<p>ACGIH TLV (United States, 3/2017). STEL: 54000 mg/m³ 15 minutes. STEL: 30000 ppm 15 minutes. TWA: 9000 mg/m³ 8 hours. TWA: 5000 ppm 8 hours.</p> <p>NIOSH REL (United States, 10/2016). STEL: 54000 mg/m³ 15 minutes. STEL: 30000 ppm 15 minutes. TWA: 9000 mg/m³ 10 hours. TWA: 5000 ppm 10 hours.</p> <p>OSHA PEL (United States, 6/2016). TWA: 9000 mg/m³ 8 hours. TWA: 5000 ppm 8 hours.</p> <p>OSHA PEL 1989 (United States, 3/1989). STEL: 54000 mg/m³ 15 minutes. STEL: 30000 ppm 15 minutes. TWA: 18000 mg/m³ 8 hours. TWA: 10000 ppm 8 hours.</p>

Appropriate engineering controls

: Good general ventilation should be sufficient to control worker exposure to airborne contaminants.

Environmental exposure controls

: Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

Hygiene measures

: Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection

: Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: safety glasses with side-shields.

Skin protection

Hand protection

: Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary.

Body protection

: Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection

: Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection

: Based on the hazard and potential for exposure, select a respirator that meets the appropriate standard or certification. Respirators must be used according to a respiratory protection program to ensure proper fitting, training, and other important aspects of use.

Section 9. Physical and chemical properties

Appearance

Physical state	: Solid. [WHITE SNOW-LIKE SOLID]
Color	: White.
Odor	: Not available.
Odor threshold	: Not available.
pH	: Not available.
Melting point	: Sublimation temperature: -78.5°C (-109.3 to °F)
Boiling point	: Not available.
Critical temperature	: 31°C(87.8°F)
Flash point	: Not available.
Evaporation rate	: Not available.
Flammability (solid, gas)	: Not available.
Lower and upper explosive (flammable) limits	: Not available.
Vapor pressure	: Not available.
Vapor density	: Not available.
Specific Volume (ft³/lb)	: 0.6579
Gas Density (lb/ft³)	: 1.52
Relative density	: Density Solid (Dry Ice) 97.5189 lb./ft.3 at -109.3° F
Solubility	: Not available.
Solubility in water	: Not available.
Partition coefficient: n-octanol/water	: Not available.
Auto-ignition temperature	: Not available.
Decomposition temperature	: Not available.
Viscosity	: Not available.
Flow time (ISO 2431)	: Not available.
Molecular weight	: 44.01 g/mole

Section 10. Stability and reactivity

Reactivity	: No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	: The product is stable.
Possibility of hazardous reactions	: Under normal conditions of storage and use, hazardous reactions will not occur.
Conditions to avoid	: No specific data.
Incompatible materials	: No specific data.
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.
Hazardous polymerization	: Under normal conditions of storage and use, hazardous polymerization will not occur.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Not available.

Irritation/Corrosion

Not available.

Sensitization

Not available.

Mutagenicity

Not available.

Carcinogenicity

Not available.

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Eye contact : May cause eye irritation.
Inhalation : May be harmful if inhaled. May cause respiratory irritation.
Skin contact : Harmful if absorbed through the skin. May cause skin irritation.
Ingestion : May be harmful if swallowed and enters airways.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact : No specific data.
Inhalation : No specific data.
Skin contact : No specific data.
Ingestion : No specific data.

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Potential chronic health effects

Section 11. Toxicological information

Not available.

- General** : No known significant effects or critical hazards.
- Carcinogenicity** : No known significant effects or critical hazards.
- Mutagenicity** : No known significant effects or critical hazards.
- Teratogenicity** : No known significant effects or critical hazards.
- Developmental effects** : No known significant effects or critical hazards.
- Fertility effects** : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Not available.

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Not available.

Mobility in soil

- Soil/water partition coefficient (K_{oc})** : Not available.

- Other adverse effects** : No known significant effects or critical hazards.

Section 13. Disposal considerations

- Disposal methods** : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Section 14. Transport information

Section 14. Transport information

	DOT	TDG	Mexico	IMDG	IATA
UN number	UN1845	UN1845	UN1845	UN1845	UN1845
UN proper shipping name	CARBON DIOXIDE, SOLID OR DRY ICE	CARBON DIOXIDE, SOLID; OR DRY ICE	CARBON DIOXIDE, SOLID OR DRY ICE	CARBON DIOXIDE, SOLID (DRY ICE)	CARBON DIOXIDE, SOLID
Transport hazard class(es)	9 	9 	9 	9 	9 
Packing group	-	-	-	-	-
Environmental hazards	No.	No.	No.	No.	No.

“Refer to CFR 49 (or authority having jurisdiction) to determine the information required for shipment of the product.”

Additional information**DOT Classification**: **Limited quantity** Yes.: **Quantity limitation** Passenger aircraft/rail: 200 kg. Cargo aircraft: 200 kg.**TDG Classification**

: Product classified as per the following sections of the Transportation of Dangerous Goods Regulations: 2.43-2.45 (Class 9).

: **Explosive Limit and Limited Quantity Index** 5: **Passenger Carrying Ship Index** 200: **Special provisions** 18**IATA**: **Quantity limitation** Passenger and Cargo Aircraft: 200 kg. Cargo Aircraft Only: 200 kg.**Special precautions for user**: **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.**Transport in bulk according to Annex II of MARPOL and the IBC Code**

: Not available.

Section 15. Regulatory information**U.S. Federal regulations**: **TSCA 8(a) CDR Exempt/Partial exemption:** This material is listed or exempted.**Clean Air Act Section 112 (b) Hazardous Air Pollutants (HAPs)**

: Not listed

Clean Air Act Section 602 Class I Substances

: Not listed

Clean Air Act Section 602 Class II Substances

: Not listed

DEA List I Chemicals (Precursor Chemicals)

: Not listed

DEA List II Chemicals (Essential Chemicals)

: Not listed

SARA 302/304**Composition/information on ingredients**

No products were found.

Section 15. Regulatory information

SARA 304 RQ : Not applicable.

SARA 311/312

Classification : Refer to Section 2: Hazards Identification of this SDS for classification of substance.

State regulations

Massachusetts : This material is listed.

New York : This material is not listed.

New Jersey : This material is listed.

Pennsylvania : This material is listed.

International regulations

Chemical Weapon Convention List Schedules I, II & III Chemicals

Not listed.

Montreal Protocol (Annexes A, B, C, E)

Not listed.

Stockholm Convention on Persistent Organic Pollutants

Not listed.

Rotterdam Convention on Prior Informed Consent (PIC)

Not listed.

UNECE Aarhus Protocol on POPs and Heavy Metals

Not listed.

Inventory list

Australia : This material is listed or exempted.

Canada : This material is listed or exempted.

China : This material is listed or exempted.

Europe : This material is listed or exempted.

Japan : **Japan inventory (ENCS)**: This material is listed or exempted.
Japan inventory (ISHL): This material is listed or exempted.

Malaysia : Not determined.

New Zealand : This material is listed or exempted.

Philippines : This material is listed or exempted.

Republic of Korea : This material is listed or exempted.

Taiwan : This material is listed or exempted.

Thailand : Not determined.

Turkey : This material is listed or exempted.

United States : This material is listed or exempted.

Viet Nam : Not determined.

Section 16. Other information

Hazardous Material Information System (U.S.A.)

Health	3
Flammability	0
Physical hazards	0

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings and the associated label are not required on SDSs or products leaving a facility under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered trademark and service mark of the American Coatings Association, Inc.

Section 16. Other information

The customer is responsible for determining the PPE code for this material. For more information on HMIS® Personal Protective Equipment (PPE) codes, consult the HMIS® Implementation Manual.

National Fire Protection Association (U.S.A.)



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Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Procedure used to derive the classification

Classification	Justification
Not classified.	

History

Date of printing : 11/10/2018

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Key to abbreviations

: ATE = Acute Toxicity Estimate
 BCF = Bioconcentration Factor
 GHS = Globally Harmonized System of Classification and Labelling of Chemicals
 IATA = International Air Transport Association
 IBC = Intermediate Bulk Container
 IMDG = International Maritime Dangerous Goods
 LogPow = logarithm of the octanol/water partition coefficient
 MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
 UN = United Nations

References : Not available.

Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.