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Alaska Marijuana Control Board

Operating Plan Supplemental
Form MJ-04: Marijuana Cultivation Facility

What is this form?

This operating plan supplemental form is required for all applicants seeking a marijuana cultivation facility license and must accompany **Form MJ-01: Marijuana Establishment Operating Plan**, per 3 AAC 306.020(b)(11). Applicants should review **Chapter 306: Article 4** of the **Alaska Administrative Code.** This form will be used to document how an applicant intends to meet the requirements of the statutes and regulations.

If your business has a formal operating plan, you may include a copy of that operating plan with your application, but all fields of this form must still be completed per 3 AAC 306.020 and 3 AAC 306.420(2).

What additional information is required for cultivation facilities?

Applicants must identify how the proposed establishment will comply with applicable regulations regarding the following:

- Prohibitions
- Cultivation plan
- Waste disposal
- Odor control
- Testing procedure and protocols
- Packaging and labeling

This form must be completed and submitted to AMCO's main office before any new or transfer application for a standard marijuana cultivation facility or limited marijuana cultivation facility license will be considered complete.

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:	Broken Dirt, LLC	**MJ License #:**			10284
License Type:	Standard Marijuana Cultivation				
Doing Business As:	Catalyst Cannabis Co.				
Premises Address:	5001 Eagle St., Suite B				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99503

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Form MJ-04: Marijuana Cultivation Facility Operating Plan Supplemental

Section 2 – Overview of Operations

2.1. Provide an overview of your proposed facility's operations. Include information regarding the flow of marijuana from seed or clone to harvest and transfer from your premises:

Catalyst's cultivation facility manages all aspects of marijuana production from seed or clone to wholesaling our products. We begin with clones grown in jiffy pellets or in our aeroponic cloning machine in our designated cloning/propagation room. Once plants are rooted we transplant into six-inch pots keeping batched with their clone batch. If any plants are killed before they reach six inches, they are removed from the clone batch. Once rooted clones or seeds reach six inches, they are tagged with a metrc ID tag and entered into Metrc as a plant. When plants are between 6"-18" we move them into our vegetative room or into one of our flower rooms. All plant room movements are documented in Metrc. lants in the vegetative room will then be transferred into flower rooms depending on size and/or flower room space availability. Plants will remain in flower for 8-12 weeks depending on the variety. Any waste created during the growing process is documented in our marijuana waste log (also referred to as "green waste") and disposed of in accordance with our green waste SOPs.

When plants reach maturity they are harvested by Catalyst employees. The plants' wet weight is recorded in Metrc and all green waste is reported and disposed of according to our waste disposal protocols. Untested dry material is placed into 5 gallon food grade containers. Our harvest manager then randomly selects samples from these containers to submit to testing. While in testing no products are sold or transferred. Once material has been dried and testing has passed, our product is separated into trim and flower categories. Trim is then packaged, labeled and then transferred to processors or retailers. Flower is packaged, labeled, and then transferred to retail establishments. All movements, from seed to sale, are tracked in Metrc.

Section 3 – Prohibitions

Review the requirements under 3 AAC 306.405 and 3 AAC 306.410.

3.1. I certify that the marijuana cultivation facility will not: Initials

a. **sell, distribute, or transfer any marijuana or marijuana product to a consumer, with or without compensation;**

b. **allow any person, including a licensee, employee, or agent, to consume marijuana or marijuana product on the licensed premises or within 20 feet of the exterior of any building or outdoor cultivation facility; or**

c. **treat or otherwise adulterate marijuana with any organic or nonorganic chemical or compound to alter the color, appearance, weight, or odor of the marijuana.**

Section 4 – Cultivation Plan

Review the requirements under 3 AAC 306.420 and 3 AAC 306.430.

4.1. Describe the size of the space(s) the marijuana cultivation facility intends to be under cultivation, including dimensions and overall square footage. Provide your calculations below:

The Catalyst Cannabis Co. cultivation facility will be located at 5001 Eagle Street, Suite B, in Anchorage, Alaska. The overall square footage of the leased warehouse space is approximately 4,500 square feet, with our intended space under cultivation approximately 1,875 square feet to begin, with the ability to expand to up to 2,280 square feet of cultivation space. Our cultivation space will be broken up into seven separate rooms available for cultivation, though it is likely that not all of them will be under cultivation initially: Flower Room A (107), Flower Room B (109), Flower Room C (110), Flower Room 205, Flower Room 206, a Vegetative Room (108) and a Clone Room (105). Flower Room A, 107 will be approximately 504 square feet (18 feet by 28 feet). Flower Room B, 109 will be approximately 504 square feet (18 feet by 28 feet). Vegetative Room, 108 will be approximately 405 square feet (15 feet by 27 feet) and have 18 High Pressure Sodium Double Ended light fixtures. Flower Room, D, 205 will be approximately 208 square feet (13 feet by 16 feet). Flower Room, E, 206 will be approximately 195 square feet (13 feet by 15 feet) . The Clone Room, 105 will be approximately 85 square feet (12 by 7 feet). The remaining 2,300 square feet that will not be under cultivation will contain a space to dry, cure, and trim/manicure marijuana, workspace to mix nutrients and reservoirs, finished marijuana storage area, administrative office space, a security room, and unisex bathrooms. The working environment and conditions in our cultivation facility will be modeled from traditional horticultural designs while incorporating contemporary healthcare aspects to promote thorough sanitization and cleanliness. All interior architecture and engineering will begin and end with the marijuana cultivator in mind, from the physical workflow logistics of commercial production gardening to storage and plant labor features that safeguard employees and encourage compliance. Cabinets and shelving will be utilized for all natural and synthetic nutrients, integrated pest management applications, and organic compost teas, all OSHA compliant and in accordance with fire codes. Additionally, the Catalyst Cannabis Co. cultivation facility will have multiple emergency eye wash stations, first aid kits complete with field guide, and portable fire extinguishers conspicuously located throughout the building.

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Form MJ-04: Marijuana Cultivation Facility Operating Plan Supplemental

You must be able to certify the statement below. Read the following and then sign your initials in the box to the right: Initials

4.2. The proposed area(s) for cultivation are clearly identified on the Form MJ-02: Premises Diagram that is submitted with this application. ☑

Answer "Yes" or "No" to the following question: Yes No

4.3. Will the marijuana cultivation facility include outdoor production? ☐ ☒

If "Yes", describe the outdoor structure(s) or the expanse of open or clear ground and how it is fully-enclosed by a physical barrier:

4.4. Describe the method(s) used to ensure that any marijuana at the marijuana cultivation facility, whether indoors or outdoors, cannot be observed by the public from outside the facility:

We will ensure that no marijuana at our marijuana cultivation facility will be able to be observed by the public from outside the facility. The property we have secured for our cultivation facility is located at 5001 Eagle Street in Anchorage, which is recessed from the major vehicular and pedestrian thoroughfares in the area. The building is built of cinder block and painted a grey, opaque color ensuring 100% privacy and interior activity concealment. The building only has three windows (2 upstairs mezzanine, 1 ground floor), all of which will be covered and wrapped in non-transparent material. Additionally, the building is located in an industrial area that does not have high volumes of neighboring businesses, vehicle traffic, or pedestrian traffic. The entire cultivation facility will be a restricted access area and other than authorized Catalyst Cannabis Co. employees and visitors, under no circumstances will the general public be granted access or authorized access. Additionally, at no time will any marijuana-related transaction occur outside of the facility's restricted access area (plant growth phases, finished product processing, or waste disposal practices). We do not intend on having external signage on our cultivation facility advertising our name, logo, or marijuana industry affiliation. It is the intention of Catalyst Cannabis Co. to be a safe, secure, and non-polluting community member and to this end will ensure that no marijuana at our cultivation facility will be observable from outside the facility.

4.5. Describe the marijuana cultivation facility's growing medium(s) to be used:

Catalyst Cannabis Co. will be utilizing several media including, coconut coir, sphagnum moss and/or organic based soils. Catalyst Cannabis Co. will amend the media with perlite to improve the overall porosity. Perlite provides space for microorganisms to colonize and spread throughout the root zone, promoting vigor.

4.6. Describe the marijuana cultivation facility's fertilizers, chemicals, gases, and delivery systems, including carbon dioxide management, to be used:

We will ensure to establish and implement organizational standard operating procedures to promote good cultivation and handling practices to include all aspects of the fertilizers, biological chemicals, gases, and delivery systems used in cultivating marijuana. Our employees will be expected to understand, articulate, and execute the basic concepts of marijuana cultivation to include chemical attributes, agricultural and horticulture skill sets, cannabinoid properties, and the legal and regulatory compliance practices of cultivating marijuana. Good Agricultural Practices will be taught in concert with our overall organizational protocols as GAP implementation in the cultivation facility will lead to proactive integrated pest management, which will have our employees rotating biological chemical applications for full effectiveness and will overall contribute to creating a garden culture of consistent application, quality control, and institutional compliance. Catalyst Cannabis Co. marijuana cultivation fertilizers and biological chemicals will be applied by hand or with agricultural instruments. Our employees will utilize a range of different products from different manufacturers as each nutrient solution compound will provide a varying form of macronutrients, micronutrients, and soil chelates. Our cultivation and production plan will include varieties that are flowered on different timelines based on plant flower stage duration (8, 9, and 10 week varietals).

A combination of dry organic soil amendments and liquid fertilizers specifically formulated for marijuana production will be used as part of our fertilizer program. Other marijuana cultivation fertilizers and biological chemicals that we intend to have on the licensed premises include products that have been approved for use on marijuana in Colorado, Washington, and Oregon. Catalyst Cannabis Co. will take an environmentally conscious approach to our cultivation practices, as the aforementioned fertilizers and biological chemicals are the cornerstones of our hybridized organic-synthetic feeding regime that incorporates the use of beneficial bacteria, NOP and OMRI certified organic molasses based carbohydrate products, and compost teas while never using plant growth regulator chemicals. All nutrient mixes will be quality assured and measured using pH and PPM measurement tools to allow for plants to uptake at maximum efficiency levels. The only gas that Catalyst Cannabis Co. intends on using in our cultivation facility is carbon dioxide CO_2, as a plant growth enhancer. We will engage the services of Anchorage CO_2 provider Air Liquide who will professional install, provide, and service our cultivation facility of all of our CO_2 needs. (continued on p.7)

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4.7. Describe the marijuana cultivation facility's irrigation and waste water systems to be used:

Catalyst Cannabis Co. will be drawing its water for marijuana cultivation from the Anchorage municipal water utility source and system. To remove excess chlorides that may be present in the water, we will install a Hydro-Logic Tall Boy sediment filtration system. This filtration system will remove up to 90% of sediment larger than 5 microns. The removal of excess chlorides from the water will ensure a vibrant population of beneficial microorganisms in the plant's root system making for more efficient nutrient uptake and cleaner effluent runoff. We intend on implementing a drain to waste system that assists in flushing excess nutrients and to offset that impact Catalyst Cannabis Co. will collect effluent runoff for treatment and reuse where possible. Our filtered water will be held in intermediate bulk containers made of plastic composites that are white or opaque in color. Water will be transferred to either nutrient solution containers or into an industrial grade 44-gallon Brute waste receptacle with rolling casters for movement. Catalyst Cannabis Co. intends utilizing trays and tables that have been specifically designed for marijuana cultivation that directs all excess effluent water runoff to a dedicated waste drain for collection. With regard to fertilizers and biological chemical disposal, all unused nutrients and approved cultivation liquids will be diluted with the appropriate amount of water before being discharged into a water supply. All fertilizers and biological chemicals approved for use on marijuana and most 25 B exempt products will also be diluted with appropriate amounts of water before being discharged into a water supply. (continued on p.7)

Section 5 – Waste Disposal

Review the requirements under 3 AAC 306.740.

You must be able to certify the statement below. Read the following and then sign your initials in the box to the right: Initials

5.1. The marijuana cultivation facility shall give the board at least three days written notice required under 3 AAC 306.740(c) before making marijuana waste unusable and disposing of it.

5.2. Describe how you will store, manage, and dispose of any solid or liquid marijuana waste, including wastewater generated during marijuana cultivation, in compliance with any applicable laws. Include details about the material(s) you will mix with ground marijuana waste and the processes that you will use to make the marijuana waste unusable for any purpose for which it was grown:

Catalyst Cannabis Co. will abide by all local, state, and federal regulations in storing, managing, and disposing of any solid or liquid waste, including wastewater. In all of our licensed premises, we will establish designated areas for marijuana waste that will be stored in easily identified containers, to be disposed of in a secure, safe, and sanitary manner.

All marijuana waste (also referred to as green waste in our materials) shall be disposed of so as to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage, or breeding location for pests. To that end, organizational protocols will be in place to dispose or destroy any unused, unsold, contaminated, or expired marijuana, marijuana product, or any other waste product resulting from the cultivating, laboratory testing, and/or retail process. Catalyst Cannabis Co. procedural techniques will assure that marijuana and marijuana product will not become available to unauthorized persons. To ensure compliant processes and outcomes, plant waste accumulated during the cultivation process will be weighed and recorded on a daily basis.

Our employees will be trained to grind/much all marijuana waste to a non-retrievable form. At this point, the employee will mix a 1:1 ratio of marijuana waste quantity/weight with either a compostable or non-compostable material, resulting in a 50/50 mix. If utilizing compostable material, we will follow all Marijuana Control Board guidelines of food waste, yard waste, vegetable based grease or oils, or other approved wastes. If utilizing non-compostable material, we will again follow all Marijuana Control Board guidelines of paper waste, cardboard waste, plastic waste, oil, or other approved wastes. Other compostable and non-compostable materials that Catalyst Cannabis Co. will consider in mixing 50% with green waste are solid, spent mediums such as coco coir and soils. Our waste disposal and destruction processes and procedures will be visually audited implementing both an on-site managing inspector and recorded surveillance video footage. All employees will be educated and trained to understand that trash receptacles are common staging areas for diversion. (continued on p.7)

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Form MJ-04: Marijuana Cultivation Facility Operating Plan Supplemental

Section 6 – Odor Control

Review the requirements under 3 AAC 306.430.

Answer "Yes" or "No" to the following question:	Yes	No
6.1. Have you received an exemption from your local government for the odor control requirement set forth in 3 AAC 306.430(c)(2)?	☐	☒

If "Yes", you must be able to certify the statement below. Read the following and then sign your initials in the box: Initials

I am attaching to this form documentation of my odor control exemption from the local government. ☐

If "No" to question 6.1., describe the odor control method(s) to be used and how the marijuana cultivation facility will ensure that any marijuana at the facility does not emit an odor that is detectable by the public from outside the facility:

Catalyst Cannabis Co. is committed to being an upstanding and responsible business neighbor and Anchorage community member. To that end, we take odor control seriously and have a comprehensive plan to ensure that any marijuana at our facility does not emit an odor that is detectable by the public from outside the facility. To accomplish this, each flower room will a utilize carbon filtered exhaust system in order to reduce outside odor. In the trim and dry room, we plan to operate the same Can filters and fans as the flower rooms recirculating the air to reduce the smell and improve air quality. Our ventilation system has been thoughtfully designed, from scrubbing air with activated carbon filters that clean 99.5% of odor from the air to our exhaust process through UL listed ventilation fans. By utilizing carbon filters, industrial exhaust fans, a closed loop hrydronic airconditioner, and cultivation best practices, the aim of Catalyst Cannabis Co. is to prevent internal smells from becoming external nuisances.

Section 7 – Testing Procedure and Protocols

Review the requirements under 3 AAC 306.455 and 3 AAC 306.465.

You must be able to certify each statement below. Read the following and then sign your initials in the corresponding box: Initials

7.1. I understand and agree that the board or director will, from time to time, require the marijuana cultivation facility to provide samples of the growing medium, soil amendments, fertilizers, crop production aids, pesticides, or water for random compliance checks.

7.2. I will ensure that any individual responsible for collecting random, homogenous samples for required laboratory testing under 3 AAC 306.455 will prepare the necessary accompanying signed statement, provide the signed statement to the marijuana testing facility, and maintain a copy as a business record under 3 AAC 306.755.

7.3. Describe the testing procedures and protocols the marijuana cultivation facility will follow:

Catalyst Cannabis Co. will select and utilize an independent testing laboratory that has adopted a standard operating procedure to test marijuana and marijuana products that is approved by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement. We will model our due diligence evaluation process after ILAC's published standards when contemplating independent laboratory testing agreements to include the lab's conformity to accreditation standards and assessment bodies, ensuring the laboratory complies with appropriate lab standards regarding competencies in testing and calibration, and verifying that the laboratory's inspection agencies are accredited and comply with appropriate inspection standards. Catalyst Cannabis Co. will not work with or have any affiliation to a testing laboratory that does not meet the Marijuana Control Board's requirements for industry accreditation and international participation in sharing scientific data in an attempt to create transparency, uniformity, and credibility to marijuana and marijuana product testing procedures. We will ensure to select and utilize an independent testing laboratory to obtain testing samples according to a statistically valid sampling method by an agent of an independent testing laboratory. Our employees will work with the lab agents in utilizing statistical concepts to ensure the lab agent is able to obtain viable testing samples. Sampling procedures will be classified into two different categories, probability and non-probability sampling. This approach promotes a scientific structure that allows for both blind/random sampling of product lots and predetermined sampling for specific lots. The probability sampling will allow for the possibility to determine which samples belong to which lot(s) and the probability that each marijuana sample in the lot will be chosen. The non-probability process will be based on individual choice rather than blind/random selection, which eliminates unpredictable behavior and/or potential product bias that could cause inaccurate test results. We will continually work with lab agents to enforce and revise sampling operating procedures to collect and summarize data as required by the Marijuana Control Board. Catalyst Cannabis Co. intends to use the American Herbal Pharmacopeia cannabis inflorescence monograph as our guide in engaging an accredited lab approved to test marijuana and can provide cannabinoid and terpene profiles. Evaluation systems will include Gas Chromatography, Thin Layer Chromatography, High Performance Liquid Chromatography, and Gas Chromatography with flame ionization detection. Additionally, we will evaluate the lab's reputation and previous results to determine if the lab operates at our standard operating levels. We will ensure to interact with an independent testing laboratory to issue a certificate of analysis. Catalyst Cannabis Co. employees will be trained in vendor relations and the parameters of the documentation and recordkeeping required in specific transactions. Employees will know that no marijuana is to be received from an independent lab without a certificate of analysis.
(Continued on p. 8)

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Alaska Marijuana Control Board

Form MJ-04: Marijuana Cultivation Facility Operating Plan Supplemental

Section 8 – Packaging and Labeling

Review the requirements under 3 AAC 306.470 and 3 AAC 306.475.

Answer "Yes" or "No" to the following question:	Yes	No
8.1. Will the marijuana cultivation facility be packaging marijuana for a retail marijuana store to sell to a consumer without repackaging?	☑	☐

If "Yes", describe how the marijuana cultivation facility will ensure that the marijuana sold will meet the packaging requirements in 3 AAC 306.470, and provide a sample label that the facility will use to meet the labeling requirements set forth in 3 AAC 306.475:

At this time, this facility does not package marijuana for sale to a consumer without repackaging, but may do so in the future. If and when Catalyst does such pre-packaging, all packaging and labels will be designed so as to comply with packaging and labeling requirements. Marijuana intended for sale without repackaging will not exceed one ounce in weight and will be contained in packaging which is non-toxic and will protect the product from contamination. Labels will include the Catalyst name and/or logo and license number; appropriate tracking information; the five warning statements; and will not have printed images targeting persons under 21 years of age. Additional information required to be provided by retailers under 3 AAC 206.345 may be included unless retailers request the sole ability to include such information. All marijuana packages will be inspected for compliance with packaging and labeling regulations prior to shipment. See sample label on p.9.

Answer "Yes" or "No" to the following question:	Yes	No
8.2. Will the marijuana cultivation facility be packaging marijuana in wholesale packages?	☑	☐

If "Yes", describe how the marijuana cultivation facility will ensure that the marijuana sold will meet the packaging requirements in 3 AAC 306.470, and provide a sample label that the facility will use to meet the labeling requirements set forth in 3 AAC 306.475:

All packaging and labels will be designed so as to comply with packaging and labeling requirements. Packages of marijuana intended for wholesale distribution will be in packages not exceeding five pounds for repackaging by the retail store; each package will have a tracking label and all other information required by 3 AAC 306.475. All marijuana packages will be inspected for compliance with packaging and labeling regulations prior to shipment. See sample label on p.9.

I certify that as a marijuana cultivation facility, I will submit monthly reports to the Department of Revenue and pay the excise tax required under AS 43.61.010 and AS 43.61.020 on all marijuana sold or provided as a sample to a marijuana establishment, as required under 3 AAC 306.480.

I declare under penalty of unsworn falsification that this form, including all accompanying schedules and statements, is true, correct, and complete.

Signature of licensee

William Schneider

Printed name of licensee

KATREENA LITTLE NOTARY PUBLIC STATE OF ALASKA My Commission Expires: 07.04.18

Notary Public in and for the State of Alaska

My commission expires: 07.04.18

Subscribed and sworn to before me this 13th day of April, 2018.

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(Additional Space as Needed):

4.6 Continued:
Our CO2 supply will be stored in a secured 750 lb. tank located within our cultivation facility and then be piped using durable plastic tubing throughout the facility to the applicable rooms requiring CO2 for marijuana plant growth. Each cultivation facility room will have aCO2 regulating device installed in order to regulate and monitor CO2 levels at all times. Establishing best practices for the cultivation and handling of marijuana entails the entire plant life cycle spectrum, including all aspects of macro cultivation and agricultural practices for marijuana plants in the vegetative and flowering phases. All employees will be trained on the overall vegetative and flowering processes, prevalent cannabinoid compounds for particular varietals, flowering times and differences between diverse varietals, environmental considerations, watering frequency and timing, and integrated pest management practices.

The Catalyst Cannabis Co. employee training process will involve physical plant inspections during all growth phases. Plant inspection training will correlate with all anticipated cultivation facility programs involving fertilizers, biological chemicals, gases, delivery systems, and environments to include ideal airflow models, water and nutrient exchange processes, light intensity scaling, CO2 PPM presence, and overall temperature and humidity factors. Employees will be taught how to keep accurate records to learn from successes and failures; track factors that potentially caused changes in the final marijuana flower, and document the appearance and/or spread of disease and/or pests. Catalyst Cannabis Co. cultivation protocols will train employees to keep and maintain detailed logs on the overall daily cultivation environment to include irrigation frequencies, nutrients utilized, and the pH and PPM of effluent water runoff. Employee cultivation education will focus heavily on the watering, feeding, nutrient compounding, fertilization pH presence, and biological chemical science of healthy plant management. Marijuana responds positively to ample light water and CO2 and too much water, CO2, and nutrient feeding can be detrimental to the health of the plant and potentially lead to fungal diseases. Most nutrient product lines require a buffer in the form of acids that are either base or alkaline and different growth mediums require unique pH ranges for optimal growth. Furthermore, our employees will be trained on horticultural practices involving beneficial bacteria and fungus that metabolize minerals and salts into useable plant nutrients. A healthy root zone displays a wide variety of beneficial bacterial and fungal growth and this micro-herd has the ability to break down extracellular material into a usable plant metabolite while also acting as a natural pesticide. Employees will have a good understanding that marijuana is considered to be a heavy feeding plant, requiring more nutrients than most agricultural crops. To this end, Catalyst Cannabis Co. will be implementing a drain to waste system. By allowing excess effluent water to be discharged to waste keeps nutrients from precipitating chemical fixation in the plant root zone. When certain fertilizers, biological chemicals, and gases become fixated in the soil, the mobility of other nutrients and fertilizers are impacted, which could cause nutritional deficiencies that can lead to fungal and/or pest problems. All Catalyst Cannabis Co. cultivation facility employees will be trained on flushing techniques, the process of watering a plant with only H20 in order to "flush" any remaining undesirable chemicals or compounds used during the cultivation process. We will ensure that our employees flush plants for 14 days or at a minimum when the effluent from the plants has a PPM reading equal or less than the fresh water reservoir as proper flushing is imperative to cultivating clean, high quality marijuana.

4.7 Continued:
All Catalyst Cannabis Co. employees will be educated and trained to high levels of horticulture sciences comprehension and good cultivation processes that provide safe access to high quality marijuana. Our cultivation facility will be utilizing in one capacity or another drip irrigation and micro irrigation equipment, hydroponic modalities, nutrient film techniques, and aero fogging nutrient delivery systems, but focusing on the hand cultivation and watering for all of our plants. We will keep onsite records of water quality testing and records will be available for inspection upon Marijuana Control Board or federal, state, or local regulatory agency request such as the Anchorage Water and Wastewater Utility agency.

5.2 Continued:
We will use transparent waste bags at all times to discourage diversion, dispose of green waste immediately so as to avoid any illicit use or consumption, and conduct all green waste operations on camera. We will implement a waste and hazard communication plan to protect the rights of our employees to know what types of waste and hazards are present in the workplace and the potential associated health risks of exposure to certain wastes and hazards. Our employees will focus on safe and secure handling procedures for potentially dangerous waste or hazardous substances that are processed and where there is potential for skin contact, splashing, and inhalation of potentially toxic elements. To achieve these outcomes, all employees will be trained to know where spill cleanup kits will be located throughout our licensed premises and should a spill or waste process require more than onsite assistance, employees will follow local, state, and/or federal hazardous materials agency (Anchorage Solid Waste Services, Alaska Waste) protocols of notification and response. During this section of training, employees will be educated on hazardous waste management to address substance that are not clean, disinfected, or sterilized, or that are potentially corrosive, cytotoxic, ignitable, toxic, or caustic and which, if any, EPA category the waste and/or substance(s) is classified: F-List, K-list, P-List, or U-List. Employees will be taught how to cleanup and decontaminate the immediate area. All spills and waste disposal and cleanup protocols implemented will be documented in the appropriate logbook, both electronically and physically, and all records will be immediately available for inspection upon the Marijuana Control Board's or any local, state, or federal agency's request.

Disposed or destroyed products will be documented as subtracted from the seed to sale inventory tracking software system. Plant and product identification tag numbers, individual weight, type of product, and the time/date of disposal will be recorded both digitally in and physically on hard copy log forms. We have considered all aspects of the pharmaceutical drug disposal process in our organizational standard operating procedures to include (1) addressing the incorrect waste of material down sink drains and toilets leading to water contamination, (2) not throwing away full form products in the trash leading to landfill contamination, and (3) avoid recklessly disposing of products publically leading to community contamination. Catalyst Cannabis Co.'s green waste disposal program focuses on public safety and overall environmental impact. The design of our licensed premises will establish designated receptacles and areas for regular trash and green/marijuana waste that will be easily identified and readily available. All Catalyst Cannabis Co. employees will wear Personal Protective Equipment (work suits, gloves, facemasks/respirators, and safety goggles) while securely disposing or destroying marijuana and/or marijuana product. Our organizational standard operating procedures will dictate that employees will separate plant branches and stalks, cutting them down into a maximum of six-inch sections. Plant leaves will be bagged and processed through a powered mulcher/chipper and mixed with 50% non-consumable solid waste (a 1:1 ratio), which in most cases will be discarded soil or coco coir, to achieve an unusable and unrecognizable substance. Once the marijuana or marijuana product has been adulterated to a non-retrievable form, the waste will be securely and safely disposed of. After destruction, rendered green waste product shall be disposed of in either of the following modalities (1) at a solid waste site and disposal facility that provides a Certificate of Designation from the Anchorage municipal governing body (2) deposited at a compost facility that holds a Certificate of Designation from the Anchorage division of Solid Waste Services, or (3) Composted on-site at our facility and operated in compliance with all regulations pertaining to solid waste sites and locations.

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(Additional Space as Needed):

7.3 Continued:
Upon receiving the certificate of analysis from the testing lab, training cultivation facility employees will compare the test result against total allowable levels for all mycotoxins, mold CFU's, pesticides, heavy metals, foreign material, and bacterial CFU's. Catalyst Cannabis Co. employees will also compare average cannabinoid and terpene test results against the most current batch test for conformity of type. With those numbers, we will also compare our data against other approved evaluation systems like Gas Chromatography, Thin Layer Chromatography, High Performance Liquid Chromatography, and Gas Chromatography with flame ionization detection. To produce the most homogenous clonal crops, each variety will be cultivated base on our internal data for crop growth. This process will assign an average range in which the varietals produce cannabinoids, terpenes, and overall biomass. Additionally, Catalyst Cannabis Co. will use organoleptic tools to determine if marijuana plants meet the desired characteristics like odor, appearance, fell, and moisture content for certain varietal. We will use our test results and our organoleptic data logs as a baseline for overall product quality and every cultivation facility employee will be trained on each individual variety and its ideal state of growth.

Should Catalyst Cannabis Co. receive a certificate of analysis with results that do not meet Marijuana Control Board or our organizational standards, we will have the lot resampled and retested. Unlike processed marijuana product, whole flower marijuana cannot be "reworked" or homogenized in a laboratory setting. THC will degrade to CBN over time with exposure to light and oxygen, so it is possible to lower THC percentages if in fact the resulting failed quality assurance was a result of being too potent in terms of THC. Regardless, should a sample test fail the quality assurance parameters, or should a failed microbiological test result be received, Catalyst Cannabis Co. shall send off another sample for testing to confirm the original test. If the new test results show acceptable parameters the batch will move forward according to the next standard operating procedure. If the second test results also fail the parameters, the batch will be destroyed. Catalyst Cannabis Co. will ensure the independent testing laboratory is following their stand operating procedure(s) to confirm or refute original results in the event of a test result that falls out of specification. Before engaging the laboratory, Catalyst Cannabis Co. will have its senior leadership sign an attestation that testing procedures will be done according to organizational standard operating procedures, industry best practices, and required regulatory oversight, and testing parameters and expectations will be included in the attestation.

From each harvest batch, a Catalyst employee collects approximately 4 grams of a homogenous random sample to send to the testing lab. Our harvest/inventory manager is responsible for collecting the samples. After the sample is collected, the harvest/inventory manager creates and signs a document that shows the sample was selected randomly. Upon arrival at the testing facility, the employee transporting the sample provides the signed statement to the person receiving the package at the marijuana testing facility. A copy is kept on site at 5001 Eagle St. The package is transported in secure container in compliance with 306.750. While we wait for the test results, the entire batch from which the test sample was drawn is segregated. The marijuana is stored in food grade 5 gallon buckets with Harvest Batch information and plant tags. The buckets are stored in our dark, cool storage area until test results are presented by the testing facility. During this time, we do not sell or transport any of the marijuana from the batch(es) being tested. Once testing results are received marijuana will be packaged for distribution, long term storage or additional manicuring. All test results are maintained on site at our cultivation facility at 5001 Eagle St.

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Form MJ-04: Marijuana Cultivation Facility Operating Plan Supplemental

(Additional Space as Needed):

Catalyst Cannabis Company Lic #11638
Strain: Durban Poison
Cultivator: Catalyst Cannabis Co. Lic #10284
Harvest Batch: DuPo -11292017 | Harvest Date: 11/29/2017
THC: 16.33% CBD: 0.06%

Marijuana has intoxicating effects and may be habit forming and addictive.
Marijuana impairs concentration, coordination, and judgment.
Do not operate a vehicle or machinery under its influence.
There are health risks associated with consumption of marijuana.
For use only by adults twenty-one and older. Keep out of the reach of children.
Marijuana should not be used by women who are pregnant or breast feeding.

Net Wt. 1g

Received by AMCO 05.23.18