

## ONLINE PUBLIC COMMENTS FOR REVIEW

Date: 04/08/2022

Regulation: 230-RICR-80-05-4

Title: Minimum Requirements for Departmental Approval of Volatile Solvent-Based Hydrocarbon Extraction Operations

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### Reviewed Comments

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**Comment ID:** 12743-470

**Comment By:** Chris Reilly

**On:** 03/23/2022

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### Comment:

The Thomas C. Slater Compassion Center Inc. ("TCS") is pleased to support the proposed rule establishing minimum requirements for Departmental approval of volatile solvent-based hydrocarbon extraction operations.

TCS's interest in hydrocarbon extraction first began in February, 2019, when it requested guidance from the Department of Business Regulation on a process of approval. At the time, there was no state mandate for third-party laboratory testing of products, including testing for residual solvents. In fact, there were no state approved laboratories in place to handle this type of analysis. Now that RI has a robust laboratory testing mandate for cannabis and cannabis products, we look forward to expanding extraction capabilities to include the use of approved hydrocarbons.

The advantages of hydrocarbon extraction are extensive. Solvents like pharmaceutical grade butane are much more efficient than processes like carbon dioxide. TCS projects that it can achieve a significantly higher yield of end products using a solvent like butane, when compared to CO<sub>2</sub>, using the same amount of plant material. It also projects that butane extraction takes half the production time of carbon dioxide to produce the same amount of end product.

For patients, the benefits are significant. The increase in yield will allow for a greater variety and supply of highly desired medicine for patients in the state. Butane extraction is also scientifically superior to carbon dioxide extraction because delicate terpene profiles are preserved. This offers patients a smell, taste, and medicinal effect that is unmatched by other extraction methods. Under carbon dioxide extraction, which relies on high pressure, terpene profiles are stripped, requiring terpene re-introduction.

TCS initiated a process with multiple agencies in 2019 around its plans for hydrocarbon extraction. The Office of State Fire Marshal reviewed the plan for a pre-fabricated unit to conduct extraction and certified its approval. The team at TCS also met with staff at the RI Department of Environmental Management to review its proposal for hydrocarbon extraction. DEM provided correspondence after the meeting to certify that the plans did not conflict with issues related to hazardous waste generation, wastewater disposal, air pollution control, industrial stormwater, and stormwater.

TCS supports the revised rule for departmental approval of volatile solvent-based hydrocarbon extraction operations. It will provide a process for new methods of extraction in the marketplace which will be of great benefit to patients.