



November 7, 2022

Governor's Office of Planning & Research

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Lydia Elias, Planner I
City of Richmond Planning and Building Services Department
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STATE CLEARING HOUSE

Subject: SCH No. 2022100145 – Raven SR Bioenergy Project Mitigated Negative Declaration – Contra Costa County

Dear Lydia Elias,

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The City of Richmond Planning Department, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Raven SR Project is located at 1 Parr Boulevard, Richmond, California. The location is within the West Contra Costa Sanitary Landfill (WCCSL) facility located in the northwest area of the City of Richmond, in Contra Costa County, California. For purpose of this environmental document, the project would occur within approximately 2.5 acres of the existing Republic Services Bulk Materials Processing Center (BMPC) within "Area A" of the WCCSL. The property is located approximately 0.25 miles west of Parr Boulevard (approximately 0.25 miles west from Richmond Parkway) via an unpaved access road. The northern boundary of the project site is the City of Richmond / Contra Costa County jurisdiction line; the project site is located wholly within the City of Richmond, except for use of an existing access/egress road located within the County. The project site is located within Assessor's Parcel Number (APN) 408-140-009.

The proposed project would add a bioenergy system at the site. The non-combustion process would convert blended green waste and food waste, obtained from the existing

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BMPC operation adjacent to the project site, into renewable, transportation grade hydrogen that would be exported offsite for various renewable energy products. No long-term hydrogen storage would occur onsite. The project would involve the erection of a modular structure and industrial canopy.

The conversion method uses a non-combustion (i.e., anoxic, indirect external heating), low pressure process. The only chemicals added would be carbon dioxide (CO₂), calcium carbonate (limestone), and steam (i.e., water heated into a vapor state). No hazardous materials would be used in the process. The conversion occurs in sealed rotating drums that drop out solid matter from the green and food waste feedstock, which would consist largely of biocarbon, along with dirt, glass, grit, rocks, and inorganic salts. The biocarbon materials are inert to the process (i.e., not gasified) and drop out in the first stage. The process also drops out excess water. Neither the biocarbon nor the water would be considered a hazardous material.

Prior to being received at the site, the material will be ground and screened at the WCCSL compost site. Maximum daily tonnage is estimated to be 99.9 wet tons per day of blended green waste and food waste. The Raven SR system may run up to 24 hours per day, seven days per week.

The operation would involve up to approximately 12 hydrogen tube trucks and up to approximately 15 biocarbon trucks (total 37 trucks) per week, each with an average trip of 40 miles after leaving the site. Considering this with other trucks and employees coming to and leaving the project site daily, the project is estimated to generate about 130 vehicle trips on a typical weekday.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/MND, in addition to the specific location noted.

Comments for the Draft IS/MND are summarized below:

1. Project Description, Daily Quantities and Operations, PDF Page 22 – “The Raven facility would receive up to 99.9 wet tons per day of blended green waste and food waste feedstock...” Receipt of this volume of solid waste for further processing will require a [Transfer/Processing Facility](#) Solid Waste Facility Permit. As a reminder, per [PRC 40191](#) a solid waste facility cannot receive hazardous, radioactive, or medical wastes.
2. Project Description, Odor Control, PDF Page 23 – “Nuisance odor from Raven is unlikely since feedstock material would only be on the feedstock management area floor for relatively short periods of time.” The applicant should clarify how long the material will be stored in the storage bunkers or other designated material storage areas prior to being placed in the Raven SR's Reformation Technology system? Given the putrescible nature of the incoming feedstock, what methods will the applicant utilize to control or prevent the propagation,

harborage and attraction of flies, rodents, or other vectors, and animals, and to minimize bird attraction.? Per Title 14 CCR Section [17410.1\(a\)\(2\)](#) “facilities shall remove solid waste accepted at the site within 48 hours from the time of receipt.”

Solid Waste Regulatory Oversight

Contra Costa Health Services is the Local Enforcement Agency (LEA) for Contra Costa County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact Tim Kraus, the LEA, at 925.608.5549 to discuss the regulatory requirements for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body. If you have any questions regarding these comments, please contact me at 916.341.6119 or by e-mail at Harprit.Mattu@calrecycle.ca.gov.

Sincerely,

Harprit Mattu

Harprit Mattu, Environmental Scientist
Permitting & Assistance Branch – North
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Eric Kiruja, Supervisor
Permitting & Assistance Branch – North

Tim Kraus, REHS, LEA
Contra Costa Health Services