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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Lydia Elias, Planner 1
(Sent electronically to Lydia_Elias@ci.richmond.ca.us)
City of Richmond Planning Division
450 Civic Center Plaza-2nd Floor
Richmond, CA 94804
Phone: (510) 620-5558

STATE CLEARING HOUSE

Subject: Raven SR Bioenergy Project Draft Initial Study/Mitigated Negative Declaration
(SCH 2022100145)

Dear Ms. Elias,

Thank you for the opportunity to review and comment on the draft Mitigated Negative Declaration for the Raven SR Bioenergy Project (SCH 2022100145). The Department of Toxic Substances Control (DTSC) has identified that your project may affect, and in turn be affected by, the West County Landfill Inc. Post-Closure Permit project (CAD041844002). The Post-Closure Project area is surrounded by the Class II portion of the West Contra Costa County Sanitary Landfill. Initial wastes received included demolition debris, municipal solid waste, and industrial waste. In later years, the site was designated to receive hazardous waste. The Project area has operated a corrective action groundwater monitoring program for the Hazardous Waste Management Facility (HWMF) since March 1996. This program consists of measuring leachate and groundwater levels to evaluate inward hydraulic gradients across the HWMF and E-22R slurry walls, and the semiannual sampling and analysis of groundwater from 33 wells to monitor groundwater quality in the surficial, shallow, and medium water-bearing zones (WBZs) beneath the Project area.

Additional information about the permit and groundwater contamination at the site is available [here](#).

DTSC has the following comments on the draft Mitigated Negative Declaration and Initial Study for the Raven SR Bioenergy Project:

1. The proposed Raven SR Bioenergy Project's construction may destabilize the contamination at the West County Landfill Inc. Post-Closure Permit beyond its existing containment system. This may result in, the potential contamination of additional groundwater.
2. The groundwater monitoring system funnels leachate to a treatment area near the proposed Raven SR Bioenergy Project that may be damaged during construction.
3. DTSC believes that City of Richmond must address these concerns to avoid any significant impacts under CEQA that may occur and ensure that the West County Landfill Inc. Post-Closure care is operational during and after construction of the SR Bioenergy Project.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please contact Rebecca De Pont, Supervising Environmental Planner at (916) 255-3638 or Rebecca.Depont@dtsc.ca.gov.

Sincerely,

Rebecca De Pont

Rebecca De Pont
Supervising Environmental Planner, Permitting Division
Department of Toxic Substances Control