



Department of  
Resources Recycling and Recovery

Yana Garcia  
Secretary for Environmental Protection  
Rachel Machi Wagoner  
CalRecycle Director

April 12, 2023

Lydia Elias, Planner I  
City of Richmond Planning Department  
450 Civic Center Plaza  
Richmond, CA 94804



**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 an Updated Initial Study/Mitigated Negative Declaration (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 updated IS/MND document is meant to clarify, amplify, and refine the language of the draft IS/MND. Among others, the update provides additional description of proposed operational details, information from a health risk assessment (HRA), and more details regarding the project's impacts on air quality and greenhouse gases. The Updated Initial Study/Mitigated Negative Declaration has concluded that the proposed project will not result in any adverse effects which fall within the "Mandatory Findings of Significance" contained in Section 15065 of the State CEQA Guidelines.

The project site is located at 1 Parr Boulevard, in the City of Richmond, Contra Costa County, California. It 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 the environmental document, the project would occur within approximately 2.5 acres of the existing Bulk Materials Processing Center (BMPC) 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 Raven SR Bioenergy Project (project) proposes to construct and operate a bioenergy system composed of the Raven SR multi-patented Steam/CO<sub>2</sub> Reformation process at the project site. The non-combustion process would convert blended green waste and food waste, obtained from the existing 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 reduce existing flaring of landfill gas (LFG) produced from the decomposition of organic solid wastes in the WCCSL facility, and would help reduce greenhouse gas emissions and produce renewable "green" hydrogen using a low-carbon process. The project would also involve the construction of a modular structure and industrial canopy.

### **Comments**

CalRecycle does not have any additional comments beyond the comments previously submitted for the Draft Initial Study/Mitigated Negative Declaration on November 7, 2022.

### **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](mailto: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