



March 18, 2024

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

Subject: SCH No. 2023040173 – Draft Environmental Impact Report for H Cycle
Pittsburg Renewable Hydrogen Project – City of Pittsburg

Alison Hodgkin:

The Department of Resources Recycling and Recovery (CalRecycle) staff as a Responsible Agency have the following comments on the proposed project for your agency's consideration as part of the California Environmental Quality Act (CEQA) process.

Project Description

CalRecycle staff find that the City of Pittsburg, acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report (DEIR) in compliance with CEQA.

The proposed H Cycle Pittsburg Renewable Hydrogen Project is in the City of Pittsburg along New York Slough, southeast of the Pittsburg Marina. The proposed project site is at the corner of Arcy Lane where it turns west, approximately 0.4 mile north of the Pittsburg-Antioch Highway. The project site is approximately 20 acres, and the site is currently zoned General Industrial (IG). The project area is an open and non-treed grassland valley ringed with low wooded hills with residential properties. Developed lands within 1 mile of the project site include a variety of residential, commercial, industrial, and public uses.

The proposed project is to develop and operate a renewable hydrogen production facility to convert organic waste feedstock to hydrogen. Proposed operations would occur 24 hours per day, seven days per week. The average vehicle trips per day will be 187.

The City estimates that 550 tons per day (TPD) of organic waste will be received at the proposed project site.

Comments

Where a specific section of the document is noted as part of a comment, please ensure the comment is addressed throughout all sections of the Draft EIR where appropriate. The solid waste facility permit issued by the Local Enforcement Agency will need to include design and operating parameters including, but not limited to, permitted area (acreage), daily tonnage, daily vehicle count, and hours of operation.

Comments for the Draft EIR are below:

Section ES.4, Page ES-3

This section states that the proposed renewable hydrogen facility would be approximately 12 acres of the 24-acre Study Area and that the proposed project site would encompass approximately 20 acres. Are there any proposed solid waste handling activities that will occur outside of the 20-acre project area?

Section 1.2, Page 1-25; Section 1.5, Page 1-27

Section 1.5 states “The proposed Project also requires two solid waste facility permits to be issued by the City solid waste Local Enforcement Agency (LEA), one permit to operate as a Transfer/Processing facility and one permit to operate as an Engineered Municipal Solid Waste (EMSW) Conversion facility.” Section 1.2 states that the project would divert a peak waste volume of 550 TPD from landfills. Per California Public Resources Code section 40131.2(a)(6), an EMSW conversion facility cannot accept more than 500 TPD. A Transfer/Processing facility receiving 550 TPD will require a full solid waste facilities permit. Please clarify if the tonnage included in the document is for the Transfer/Processing facility, the EMSW conversion facility, or both.

Section 2.3.3.2, Page 2-13

This section states that the facility will operate 24 hours a day, 7 days a week, and that most trucks would enter the facility between 6am to 10pm. The document should include a description and analysis of truck traffic for the full 24-hour operating period.

Section 3.16.2.2, Page 3.16-9

This section states the project would generate an average of 93 passenger vehicle trips and an average of 94 truck trips per day. The peak truck trip amounts listed in section 2.3.3.2 sum up to 94 truck trips per day. Please clarify the average and the peak number of truck trips and vehicle trips per day.

Solid Waste Regulatory Oversight

The City of Pittsburg, Environmental Affairs Division, is the Local Enforcement Agency and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact Zuna Barker at 925-252-4129 to discuss the regulatory requirements for the proposed project.

Article 2 of the SB1383 regulations Technology Determination

On January 11, 2024, the Department of Resources Recycling and Recovery determined that the proposed H Cycle technology as described in the application provided to CalRecycle constitutes a reduction in landfill disposal consistent with California Code of Regulations Title 14, section 18983.2. For the project's technology to be considered a reduction in landfill disposal, the project will need to be built and operated consistent with the description in H Cycle's application and CalRecycle's determination letter.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document.

CalRecycle staff requests copies of all subsequent environmental documents, copies of public notices, and any Notices of Determination for this proposed project.

If the environmental document is certified during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is certified 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, REHS, Environmental Scientist
Permitting & Assistance Branch – North
Waste Permitting, Compliance & Mitigation Division
CalRecycle