Notice of Preparation

TO: Interested Parties, Responsible & Trustee Agencies and Community Members

FROM: Chris Jones, City of Napa, Associate Engineer, Utilities Department

DATE: November 15, 2023

SUBJECT: Notice of Preparation (Notice) of an Environmental Impact Report (EIR) and Notice of Zoom Scoping Meeting for Napa Renewable Resources Project 2.0 (NRRP 2.0)

Summary

The City of Napa (City) is issuing this notice to advise other agencies and the public that the City will be preparing an Environmental Impact Report (EIR) for the Napa Renewable Resources Project 2.0 (NRRP 2.0). NRRP 2.0 (the "Project") will be on and adjacent to the existing Napa Material Diversion Facility at 820 Levitin Way, unincorporated Napa County. The EIR will be prepared in compliance with the California Environmental Quality Act (CEQA) and relevant state and Federal laws. The City will serve as the CEQA lead agency for preparation of the EIR.

The City is issuing this Notice to alert interested parties and solicit agency and public input regarding the scope and content of the environmental analysis. Input received will be considered in the preparation of the EIR.

Dates for Comments and Public Scoping Meeting

Written comments on the scope of the EIR, including the Project objectives, impacts to be evaluated, methodologies to be used in the evaluations, and the alternatives to be considered, should be provided to the City by December 15, 2023. A scoping meeting Zoom Webinar will be held on December 6, 2023, at 9 a.m.

The Webinar information is below:

https://us02web.zoom.us/j/86264052636

Or join the webinar by Phone (669) 444-9171 or 669 900 6833 Webinar ID: 862 6405 2636

This notice with details of the webinar will also be posted on the City's Utility Department website:

Recycling & Solid Waste Division | Napa, CA (cityofnapa.org)

The Project objectives, description of the proposed Project and alternatives currently under consideration will be presented in the scoping meeting with a PowerPoint slide presentation.

Contact Address

Written comments on the Project scope should be sent to:

City of Napa Utilities Department
ATTN: Chris Jones, P.E.
RE: NRRP 2.0 EIR
P.O. Box 660
Napa, CA 94559-0660

Or, via email with the subject line "NRRP 2.0 EIR" to: chrisjones@cityofnapa.org

For Further Information Contact: Chris Jones at (707) 257-9460

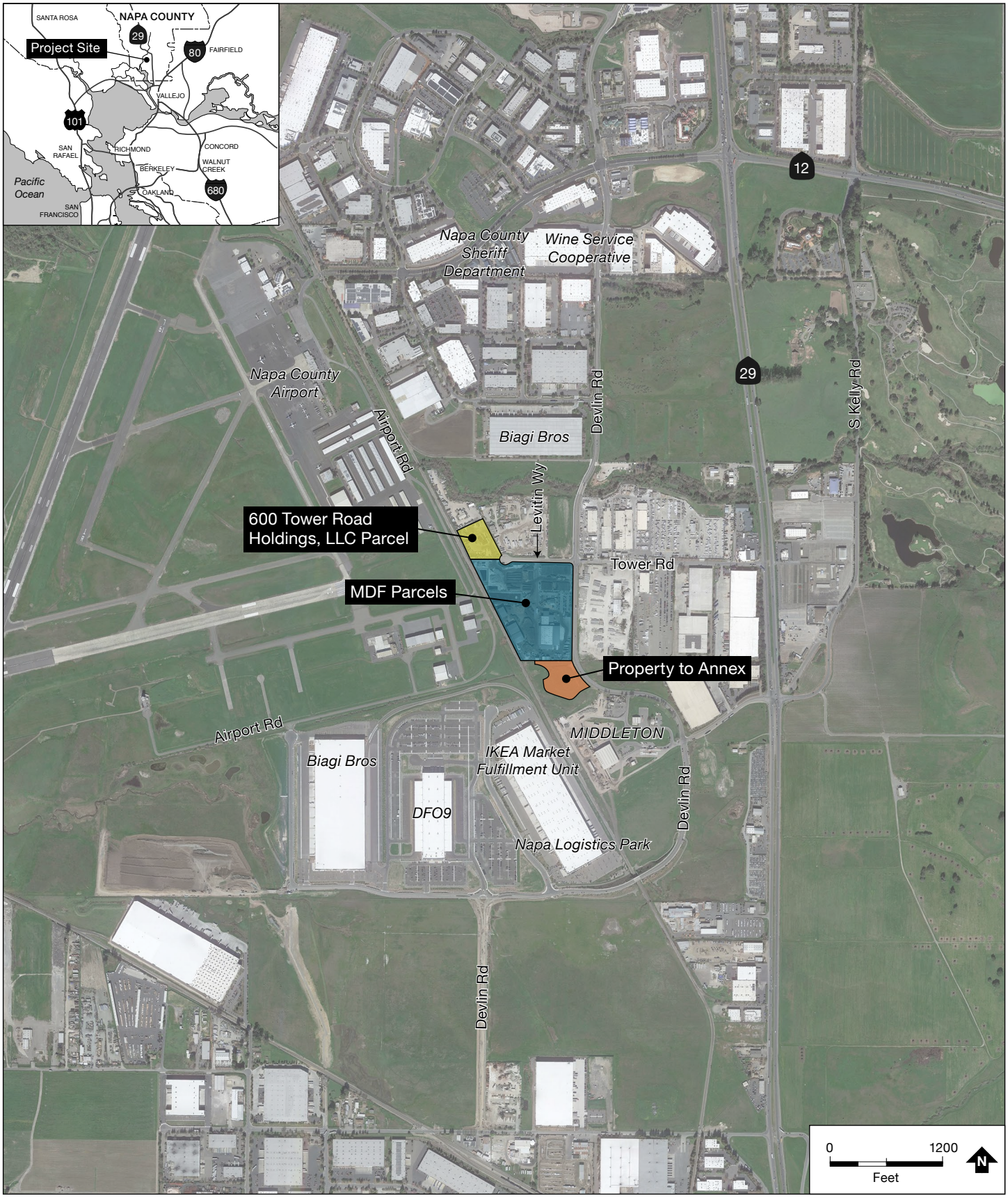
Supplemental Information

EIR Scoping

The City invites all interested individuals, organizations, public agencies, and Native American Tribes to comment on the scope of the EIR, including the Project objectives, the alternatives to be studied, the impacts to be evaluated and the evaluation methods to be used. Comments should focus on alternatives that may have fewer environmental impacts while achieving similar objectives and the identification of any significant social, economic, or environmental issues related to alternatives.

Project Location and Setting

The proposed Project site is located at 820 Levitin Way and adjacent parcels (see **Figure 1**). The Napa Materials Diversion Facility (NMDF) is located at 820 Levitin Way and currently receives and processes all solid waste, compostable and recyclable materials generated within the City that are collected by the City's authorized operator Napa Recycling & Waste Services (NRWS). The NMDF also receives, and processes materials delivered by haulers servicing surrounding jurisdictions (such as unincorporated Napa County) and by private (self-haul) customers.



Source: RCH Group; Google Earth Pro, 2023

Figure 1
Regional Site Location

RCH GROUP
planning & environmental consulting

Current operations on the Project site include receiving, storing, processing, recycling, and composting waste materials from residential, commercial, and industrial sectors. The site operates under Solid Waste Facility Permit 28-AA-0030.

The Project would include a portion of the adjacent parcel to the south (APN 057-090-060). The parcel will be split into a separate parcel upon purchase and subsequently annexed into the City of Napa. The EIR will evaluate the southern parcel area as the location for the proposed biomass gasification facility and potentially other NMDF operations.

The Project would also add a portion of the parcel to the north that is owned by 600 Tower Road Holdings, LLC, an LLC with the same owners as NRWS. The Tower Road Parcel may be used for inert materials processing and storage and equipment storage.

The current Napa Renewable Resources Project 1.0 (NRRP 1.0) at the NMDF was approved in 2014 (with later amendments). The City plans to increase its resource recovery capabilities at the NMDF to meet evolving state regulations for solid waste, compostable and recyclable materials. The proposed changes will be evaluated in the NRRP 2.0 EIR. The NRRP 2.0 EIR will evaluate resource recovery improvements on and adjacent to the existing NMDF operations at 820 Levitin Way.

The proposed major improvements consist of the following:

- Increase NMDF permitted maximum incoming daily tonnage from to 760 to 1,000 tons per day;
- Add a Biomass Gasification Facility on adjacent property to be annexed into City of Napa or on the existing NMDF site;
- Add an Anaerobic Digestion Facility on the existing NMDF site or on the adjacent property to be annexed into the City; and
- Add solar panels over the parking and materials storage areas along the eastern property border from the covered aerated static piles (CASP) to the property boundary.

Increase daily Tonnage Limits

To meet evolving state regulations for solid waste, compostable and recyclable materials, and the resulting increases in demand for processing capabilities, the Project would increase the tonnage limit for the facility from 760 to 1,000 tons per day. The increase would acknowledge the increased processing capacity of the facility from the anaerobic digester (AD), the biomass gasification facility (BGF), equipment upgrades, and potentially increased hours of operation for some of the existing operations. The increase in tonnage limits would assist in accommodating increased demands from new state regulations such as SB 1383[1], the innovative technologies, as well as seasonal fluctuations in materials received (i.e., agricultural materials [e.g., grape pomace], and the seasonal increase from autumn leaves).

[1] California Department of Resources Recycling and Recovery (CalRecycle), https://calrecycle.ca.gov/organics/slcp/, accessed Sept. 26, 2023.

Biomass Gasification Facility

The Biomass Gasification Facility (BGF) could be developed on the undeveloped, adjacent property (APN: 057-090-060) to the south of the NMDF or on the existing NMDF site. The property to the south is owned by Napa-Vallejo Waste Management Authority, and it is proposed to be purchased by the City and then annexed into the City subject to approval by Local Agency Formation Commission (LAFCO) of Napa County. After the proposed purchase of the adjacent property, the existing parcel (APN: 057-090-060) will create a smaller 2.87-acre parcel. The resulting 2.87-acre parcel would exclude the wetlands on APN: 057-090-060 that have been identified in previous studies. The adjacent property is located on the westerly side of Devlin Road between NMDF to the north and Devlin Road Transfer Station to the south.

NRWS plans to engage a design-build contractor for the design and construction of a biomass gasification facility (Facility) at the Napa Material Diversion Facility (NMDF). A large impetus for this effort was the closure of many conventional biomass energy facilities that considerably increased the cost of diverting wood waste, particularly compost overs, from landfill disposal. Operation of a BGF at the NMDF will mitigate those cost increases as well as avoid the need for off-site shipment of these materials (avoiding potentially 900 – 1900 truck shipments annually). The facility may produce electric power, renewable transportation fuel, biochar, other products, or a combination thereof.

The Biomass Gasification Facility (BGF) could be constructed on the above-mentioned property and is anticipated to have the capacity to generate 3 to 5 megawatts (MW) of electricity. A BGF Request for Proposals (RFP) was issued July 26, 2023, for experienced companies to, at a minimum, design and build the BGF. Following the selection of a preferred candidate for development of the BGF, this EIR will include information provided by the selected Project developer, and analysis of environmental impacts.

In California, there are about two dozen active biomass to energy plants in operation. These plants are fueled primarily by wood waste and agricultural residues. Gasification typically refers to conversion in an oxygen- or air-deficient environment to produce fuel gases (e.g., synthesis gas, also known as "syngas"). The fuel gases are principally carbon monoxide, hydrogen, methane, and lighter hydrocarbons, but depending on the process used, can contain significant amounts of carbon dioxide and nitrogen, the latter mostly from air. Gasification also produces liquids (tars, oils, and other condensates) and solids (char, ash) from solid feedstocks.[2]

Anaerobic Digester

The existing NMDF site was approved for an Anaerobic Digester (AD) in the 2014 CEQA Mitigated Negative Declaration (MND). However, the AD has not been constructed. In May 2023, the City of Napa applied for a $10,000,000 grant with the Department of Resources Recycling and Recovery (CalRecycle) for funds to develop AD on the existing NMDF property. The details for the technology in the CalRecycle grant will be evaluated in the EIR, identifying any impacts from the AD operations that were not addressed in the 2014 MND and addendums.

[2] California Department of Resources Recycling and Recovery (CalRecycle), https://calrecycle.ca.gov/organics/conversion/pathways/thermochem/, accessed Sept. 26, 2023.

The AD would have a comparable footprint to the facility included in the second Technical Addendum to the 2014 MND, with incoming feedstock and residuals of up to 44,000 tons per year (TPY). However, the AD process would be different than the facility described in the original 2014 MND, but generally consistent with the second Technical Addendum to the 2014 MND.

The grant application plan is to construct an AD with high biomethane potential material such as food waste supplemented with green waste to maintain a solid matrix that is suitable for a plug flow system. The AD technology selected by the city is provided by Zero Waste Energy, LLC (ZWE), and uses a continuous plug-flow system to produce biogas and digestate. The biogas is cleaned and compressed to generate carbon negative renewable natural gas (RNG) that will fuel trucks owned by NRWS or affiliated companies. Since the supply of RNG is projected to meet the demand of the vehicle fleet, there should be no need for expensive PUC pipeline injection that takes millions of dollars and many years. The pathogen-free digestate will be composted on site in the CASP unit, but can also be dried, screened and sold as fertilizer. At peak capacity, the AD and its gas cleanup and compression system would produce 350,000 diesel gallon equivalents of RNG.

Organic material for this Project could be sourced from within the City and County of Napa, from the Upper Valley Waste Management Agency with disposal at the Clover Flat Landfill, from several cities in San Mateo County transferred by the Blue Line Transfer and disposed of at Ox Mountain; and from various Alameda County jurisdictions transferred from the Alameda County Industries Transfer Facility that have been disposed at Vasco Landfill. The facility could accommodate other jurisdictions, particularly as the amount of organic materials captured increases as a result of SB 1383.

The AD will utilize high biomethane potential material such as food waste supplemented with green waste to maintain a solid matrix that is suitable for a plug flow system. The food waste will come from commercial, multi-family dwellings (MFD), residential and self-haul (RSH) sources and industrial sources. The green waste will be from commercial, MFD, and RSH sources. The AD will be permitted for incoming feedstock and residuals of up to 44,000 TPY. The amount of tonnage processed through the AD is ultimately determined by the ratio of high methane producing food waste compared to green waste.

Solar

The project includes the construction, operation, and maintenance of approximately 2,500 solar panels that would be installed on canopies with a minimum height of 18 feet along the eastern boundary of the site. The canopies and solar panels will provide cover over parking and material storage areas. The solar panel system would be approximately 1 MW and was sized to offset approximately 80 percent of NMDF power consumption. Use of the solar panels would produce approximately 36,000 megawatts-hours of power over the 20-year life of the project. The solar panels would generate net cost savings for the facility and generate renewable energy credits.

Key Environmental Issues

Air Quality

The EIR will evaluate dust, odor, construction, and operational air emissions, resulting from the proposed Project including potential for conflict with existing air quality plans, standards, and requirements.

Biological Resources

The EIR will evaluate the potential of the Project to result in significant impacts on biological resources, including potential impacts on wetlands, special status species and sensitive habitats, and potential conflicts with biological resource protection plans and policies.

Cultural Resources

The EIR will evaluate the potential of the Project to result in impacts to sensitive cultural and archeological resources that may be present on the Project site.

Energy

The EIR will evaluate the potential of the Project to result in wasteful, inefficient, or unnecessary consumption of energy resources.

Geology and Soils

The EIR will evaluate geologic hazards relevant to the Project due to seismic shaking, seismic related ground instability, soil erosion, expansive soils, and unstable geology.

Greenhouse Gas Emissions

The EIR will evaluate the potential of the Project to result in impacts related to greenhouse gas emissions and any conflict with greenhouse gas emission control plans and policies.

Hazards and Hazardous Materials

The EIR will evaluate whether hazardous materials on the project site could create a significant hazard to the public or environment.

Hydrology and Water Quality

The EIR will evaluate Project impacts to hydrology, water quality, and groundwater resources.

Land Use and Planning

The EIR will analyze whether the Project would conflict with land use plans, policies, or regulations.

Noise

The EIR will analyze noise impacts from construction and long-term operation of the Project.

Traffic and Transportation

The EIR will describe the transportation and circulation impacts of the Project and evaluate the potential for significant impacts. This section of the EIR will identify conflicts with programs, plans or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The EIR will also evaluate any increased hazards due to geometric design features (e.g., sharp curves or dangerous intersections) and inadequate emergency access. Also, the EIR will evaluate passenger vehicle miles traveled (VMT) in accordance with senate bill (SB) 743.

Cumulative Impacts

The EIR will analyze whether the proposed project would result in cumulative and long-term effects that would adversely affect the environment.

Alternatives

The EIR will consider the proposed Project and a reasonable range of alternatives including possible alternatives such as a Reduced Project Alternative, and the required No Project Alternative. The City welcomes comments from the public on alternatives that should be considered.

The EIR Process and Role of Participating Agencies and the Public

The City encourages participation in the EIR process during scoping and review of the resulting environmental documents. Comments and suggestions are invited from all interested agencies and the public at large so that the full range of issues related to the proposed Project and all reasonable feasible alternatives are addressed, and that all potentially significant issues are identified. In particular, the City is interested in learning whether there are areas of environmental concern and whether there might be a potential for significant impacts. For all potentially significant impacts, the EIR will identify mitigation measures, where feasible, to reduce the impacts to a level below significance.

Public agencies with jurisdiction are requested to advise the City of their applicable permit and environmental review requirements, and the scope and content of the environmental information that is germane to the agency's statutory responsibilities in connection to the proposed Project. Public agencies are requested to advise the City if they anticipate taking major action in connection with the proposed Project and if they wish to cooperate in the preparation of the EIR.

A public scoping meeting (Zoom Webinar) has been scheduled as a key component of the scoping process. Details of the scoping meeting are provided on Pages 1 and 2 of this Notice.

Due to time limits mandated by state law, public agencies are requested to send their responses to this Notice to the City at the address provided above at the earliest possible date, but no later than December 15, 2023. Members of the public should also provide scoping comments by that date.