



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

March 18, 2024

Alison Hodgkin
City of Pittsburg
65 Civic Avenue
Pittsburg, CA 94565

RE: Draft Environmental Impact Report for the H Cycle Pittsburg Renewable Hydrogen Project

Dear Alison Hodgkin:

The Bay Area Air Quality Management District (Air District) reviewed the Draft Environmental Impact Report (DEIR) for the proposed H Cycle Pittsburg Renewable Hydrogen Project (Project). The City of Pittsburg (City) is proposing to construct and operate a 12-acre plant in the City of Pittsburg. The Project site is located on the corner of Arcy Lane north of the Pittsburg-Antioch Highway, and southeast of the New York Slough Waterfront at 901 Loveridge Road. The Project will inspect, sort and convert landfill materials into renewable hydrogen through a thermal conversion process using heat and electricity. The renewable hydrogen will be used for hydrogen fuel cell vehicles such as heavy-duty trucks and buses.

This thermal conversion process represents a novel renewable hydrogen production strategy. However, it will introduce additional air pollution into a community that is already overburdened. The City should work with the Air District to ensure that the air emissions from the facility are less than significant as disclosed in the DEIR.

The Project is located within the boundaries of an Overburdened Community, as defined by the Air District's [Regulation 2, Rule 1: General Requirements](#).¹ These communities typically experience higher health impacts from pollution exposure. Because of the potential impact to surrounding communities, the Air District strongly urges City staff to apply Environmental Justice principles as defined in Chapter 2 of the [Air District's California Environmental Quality Act \(CEQA\) Guidelines](#) entitled, "[Best Practices for Centering Environmental Justice \(EJ\), Health, and Equity](#)" to this Project.

¹ Bay Area Air Quality Management District. Regulation 2, Rule 1: General Requirements. https://www.baaqmd.gov/~/media/dotgov/files/rules/reg-2-permits/2021-amendments/documents/20211215_rg0201-pdf.pdf?rev=103cc60e706947d3ad1e4f5a090483c1&sc_lang=en

Chapter 2 of the Air District's CEQA Guidelines state that EJ "refers to the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."² Consideration of race, demographics, and health outcomes of an impacted community are therefore crucial to a thorough and sensitive environmental review. The City should consider preparing a racial impact statement as described in Chapter 2 of the Air District's CEQA Guidelines. Please contact Air District staff for additional resources and tools to help prepare a racial impact statement, as needed.

Recommended Additional Information to Include in the DEIR

To increase transparency, Air District staff recommends that the DEIR include:

1. A reference to the Air District's Regulation 2, Rule 1: General Requirements, Section 412 requirement for Public Notice for Overburdened Communities in DEIR Section 3.3.9.14 *BAAQMD Regulations*.
2. An estimate of the maximum and expected amounts of plastic that will be contained in the material that is gasified.
3. The maximum amounts and concentrations of hazardous materials that will be stored on site, including molten sulfur, gaseous sulfur dioxide, sulfuric acid, and ammonia.
4. A detailed description of how soil will be characterized, handled, and treated before excavation starts, due to the site's historical usage to manufacture tetra-ethyl lead.
5. Confirm whether there will be a hydrogen plant stream from the K2Pure that will need to be purified. If so, characterize the hydrogen stream including the estimated maximum and expected quantities, and the contaminants. How will the hydrogen be delivered to H Cycle? Will it necessitate construction of a hydrogen pipeline and where will it be located?
6. A description of the feedstock source, as the feedstock must meet certain criteria to be considered MSW (municipal solid waste). To help characterize the feedstock and potential emissions, please describe the MSW criteria in the DEIR.
7. An Odor Prevention and Management Program.
8. A description of and if the Project is subject to:
 - a. California Air Resources Board (CARB) Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (see §93105, Title 17, CCR; Asbestos ATCM for Construction, Grading, Quarrying and Surface Mining Operations),
 - b. Air District Regulation 8, Rule 40: Aeration of Contaminated Soil and Removal of Underground Storage Tanks, and
 - c. Air District Regulation 11, Rule 2: Asbestos Demolition Renovation, and Manufacturing.

² Bay Area Air Quality Management District. 2022 CEQA Guidelines, Chapter 2, Best Practices for Centering Environmental Justice, Health, and Equity. <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-2-environmental-justicefinal-pdf.pdf?rev=724445e52f394fe1ab3d3b1636b6d023>

Finally, certain aspects of the Project may require a permit from the Air District. Please contact Barry Young, Senior Advanced Projects Advisor at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the DEIR.

We encourage City staff to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Andrea Gordon, Senior Environmental Planner at (415) 749-4940 or agordon@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Executive Officer of Science and Policy

Cc: BAAQMD Director Ken Carlson
BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Director Mark Ross