April 7, 2026

Regina Wheeler
City of Paso Robles Solid Waste and Recycling Manager
1000 Spring St.
Paso Robles, CA 93446

Subject: **SCH No. 2026030973** – Initial Study and Proposed Mitigated Negative Declaration (IS/MND) for the Paso Robles Landfill Annexation and Organics Processing Facility – City of Paso Robles

Dear Ms. Wheeler:

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 Paso Robles, acting as Lead Agency, has prepared and circulated a Draft Initial Study and Mitigated Negative Declaration 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 proposed project includes a General Plan Land Use Amendment located approximately 4.25 miles east of the city limits. The annexation area and proposed Organic Processing Facility (OPF) project site are located along the north side of California State Route 46 East (SR 46E) at the intersection of Union Road, south of the landfill, approximately 9.2 miles east of downtown Paso Robles, south of the Estrella River, and east of the community of Whitely Gardens; immediately south of the Paso Robles Landfill.

The annexation area includes five parcels; Assessor's Parcel Numbers (APNs) 015-043-005, 015-043-006, 015-043-007, 015-043-008, and 015-043-009, which total approximately 133 acres and are bounded on the south by SR 46E right-of-way, in San Luis Obispo County. The project site is approximately 133 acres, and the project area is currently zoned for Agriculture.

The proposed OPF would receive organic waste (feedstock) from a number of existing waste streams, including: spoiled packaged food waste from grocery stores and food distributors, regional municipal biosolids (~20,000 to 30,000 wet tons per year), green

waste combined with food waste collected from populated areas by waste haulers (~10,000 tons per year from Paso Robles and Atascadero), winery waste including pomace and lees, brewery waste including spent grains and trub, liquid fats, oils, and grease, and animal waste.

The incoming bulky feedstock would likely consist of approximately 80% organic green waste, 10% biosolids, and 10% food waste and would be delivered to the OPF and deposited in a reception hall. The reception hall would be a closed and ventilated room with automatic roll doors that would allow trucks to enter the facility and close immediately upon entry. From the reception hall, the material would be fed into the processing area. The material would be pre-processed through a screen that would remove contaminants such as plastic, paper, and other non-organic items, be shredded and screened to pieces of approximately 2-inch in size, and then be transported to an intermediate storage bunker. A dosing unit would monitor and feed the material in batches from the storage bunker to the digester.

As feedstock is fed into the digester, the unit would be heated, and microbial activity breaks it down. The digester would be continuously fed and it would take approximately 14 days for feedstock to process. The digested material would be removed from the digester and dewatered, separating the digested substrate (compost) from liquid digestate. Biogas is also produced during the anaerobic digestion process and would be extracted from the digester via pipes.

The digested substrate would be fed into a pyrolysis process, or other technology capable of eliminating polyfluorinated alkyl substances (PFAS) present in municipal biosolids. During high-temperature pyrolysis, the digested substrate (potentially mixed with dry feedstock such as crop waste) would be heated to high temperatures and thermally decompose into biochar. The biochar would primarily be used by the City to treat PFAS and pollutants in landfill leachate. Excess biochar could be sold to market for a variety of uses, including as soil amendment to improve water retention and sequester carbon in soil, pigmentation (carbon black), environmental remediation applications, and as a substitute for aggregate to produce carbon-negative concrete.

The liquid digestate would be piped to a storage tank outside the main building where it would be treated and used for dust mitigation (reducing the groundwater pumping needs of the landfill) or utilized for additional benefit in the future.

The solid organic waste would be converted into renewable natural gas (RNG), which would be combined with the biogas and the methane gas currently generated by decomposing waste at the landfill. The RNG may be used to fuel the collection trucks currently operating out of the Paso Robles Landfill, and potentially be exported and sold to other users. The project could include a “virtual pipeline,” which would consist of a small fleet of portable roll-off RNG tanks that are refilled at the facility and delivered directly to large RNG customers. In lieu of the RNG being used as fuel, the City may

choose to convert the RNG into electricity. The electricity would be used onsite and excess electricity could be fed back into the grid.

The OPF proposes to receive between 40,000 and 200,000 wet tons of regional organic waste per year and would include an approximately 75,000 square foot building (approximately 250 feet by 300 feet). The OPF would be staffed five days a week in a single shift. Actual digestion process and biogas production/utilization takes place automatically around-the-clock without maintenance. The OPF would generate up to 49 new employee weekday trips.

This IS/MND also evaluates two improvements to the existing landfill, Paso Robles Landfill, which would be located on a portion of the annexed property with the pre-zoning designation of Public Facilities. A stormwater basin, which would handle stormwater runoff from the existing landfill, would be established on approximately 10 acres of the 133 acres to be annexed by the City within the north portion of parcel APN 015-043-008. The stormwater basin would be sized to accommodate approximately 15.3 acre-feet of water (5,000,000 gallons). Exact earthwork quantities are unknown at this time but would include approximately 5,000 cubic yards of fill on the western side of the basin, and 5 to 15 feet of cut on the eastern side.

The second landfill improvement would include establishment of an area to stockpile soil from the landfill site. The stockpile would be established on approximately 10 acres of the 133 acres to be annexed by the City within the north portion of parcel APN 015-043-009, east of the OPF project site. The City anticipates stockpiling up to 100,000 cubic yards of soil at any time, depending on landfill needs. No earthwork outside of the stockpiling activities would be needed for this area.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/MND, in addition to the specific location noted.

IS/MND, Chapter 1.3, Page No. 6,

It is stated the OPF will likely be sized to receive between 40,000 and 200,000 wet tons of regional organic waste per year.

What is the proposed daily throughput of material to be received (i.e., tons per day) and the peak daily loading capacity in tons? Analysis should include all the calculations for the proposed design capacity and daily peak loading based on the equipment, available space, personnel, etc.

IS/MND, Chapter 1.3, Page No. 9

It is stated that while to OPF has not yet been designed for this project, the City anticipates its construction would be similar to other facilities, including the Hitachi

Zosen Inova USA, LLC Kompogas® high solids anerobic digestion facility in San Luis Obispo.

CalRecycle is currently serving as the solid waste Enforcement Agency (EA) for the County of San Luis Obispo and is responsible for providing regulatory oversight of solid waste handling activities such as anaerobic digestion facilities, including permitting and inspections. The permitting and regulatory requirements for anaerobic digestion activities are contained in Title 14 California Code of Regulations (14 CCR), Chapter 3.2. Please contact the EA to discuss the solid waste facility permit requirements for the proposed project. The following internet link developed by CalRecycle staff serves as a guide to permitting in-vessel digestion operations and facilities:

https://calrecycle.ca.gov/SWFacilities/Permitting/FacilityType/InVessel/

IS/MND, Chapter 1.3, Page No. 10
It is stated that the OPF is expected to generate up to 49 new weekday employee trips as the facility would be staffed five days a week in a single shift, with occasional inspections, stand-by, or emergency operations on weekends.

Please provide the total number of daily trips expected. This should include employees, visitors, and haulers.

IS/MND, Page No. 10, Chapter 1.3
It is stated the material would be pre-processed through a screen that would remove contaminants such as plastic, paper, and other non-organic items, be shredded and screened to pieces of approximately 2-inch in size, and then be transported to an intermediate storage bunker.

CalRecycle is currently serving as EA for the County of San Luis Obispo and is responsible for providing regulatory oversight of solid waste handling activities such as transfer/processing facilities, including permitting and inspections. The permitting and regulatory requirements for transfer/processing activities are contained in Title 14 California Code of Regulations (14 CCR), Chapter 3, Article 6. Please contact the EA to discuss the solid waste facility permit requirements for the proposed project. The following internet link developed by CalRecycle staff serves as a guide to permitting transfer/processing operations and facilities:

https://calrecycle.ca.gov/SWFacilities/Permitting/FacilityType/Transfer/

IS/MND, Chapter 1.3, Page No. 10
It is stated that the solid organic waste would be converted into renewable natural gas (RNG), which would be combined with the biogas and the methane gas currently generated by decomposing waste at the landfill. The RNG may be used to fuel the collection trucks currently operating out of the Paso Robles Landfill, and potentially be exported and sold to other users.

Can you please clarify the process of how the solid waste will be converted to RNG?

IS, Chapter 1.3, Page No. 10
It is stated that the digested substrate would be fed into a pyrolysis process, or other technology capable of eliminating PFAS present in municipal biosolids. During high-temperature pyrolysis, the digested substrate (potentially mixed with dry feedstock such as crop waste) would be heated to high temperatures and thermally decompose into biochar.

Per Public Resources Code (PRC) Section 40178, "Pyrolysis" means the thermal decomposition of material at elevated temperatures in the absence or near absence of oxygen. Per PRC Section 40201, "Transformation" means incineration, pyrolysis, distillation, or biological conversion other than composting. The pyrolysis activity could be subject to solid waste permitting requirements as a Transformation activity. Please reach out to the EA contact to discuss possible permitting requirements. Here is a link to the CalRecycle website for more information:

https://calrecycle.ca.gov/swfacilities/permitting/permittype/fullpermit/

IS/MND, Chapter 1.3, Pages No. 10-11
It is stated the OPF would be manned five days a week in a single-shift. All maintenance and service tasks will be carried out during this time. Brief inspections will be made on weekends and during emergency and stand-by times. The actual digestion process takes place automatically around-the-clock without maintenance. Biogas production and utilization would also take place around-the-clock.

What are the proposed hours for operation for the OPF, including the receipt of material, handling and processing of material, and maintenance?

IS/MND, Chapter 1.3, Page No. 11
It is stated that there will be two improvements to the existing landfill which would be located on a portion of the annexed property.

Will any of these new improvements, or the OPF, require an increase in the currently permitted acreage of 80 acres and/or a change to the current Solid Waste Facility Permit boundary of the landfill? If so, please provide the updated acreage and boundary lines for the landfill.

Additional Information
The following is a link to CalRecycle's CEQA homepage which may assist the Lead Agency in preparing the Final MND:

https://calrecycle.ca.gov/swfacilities/permitting/ceqa/

Solid Waste Regulatory Oversight

CalRecycle is the EA for the County of San Luis Obispo and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact me, Cody Oquendo, to discuss any 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 Final 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 916.341.6719 or by e-mail at Cody.Oquendo@calrecycle.ca.gov.

Sincerely,

Cody Oquendo, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto, CalRecycle
Candice Houghton, CalRecycle
Jared Weathers, CalRecycle
Brandi Cummings, SWCA Environmental Consultants