

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660

FAX: (650) 589-5062

ccaro@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201

FAX: (916) 444-6209

KEVIN T. CARMICHAEL
CHRISTINA M. CARO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
RICHARD M. FRANCO
ANDREW J. GRAF
TANYA A. GULESSERIAN
DARION N. JOHNSTON
RACHAEL E. KOSS
AIDAN P. MARSHALL
ALaura R. McGUIRE
TARA C. RENGIFO

Of Counsel

MARC D. JOSEPH
DANIEL L. CARDOZO

June 6, 2025

Via Email and Overnight Mail

Mardy Thomas, Director

Glenn County

Planning & Community Development Services

225 N. Tehama Street

Willows, CA 95988

Email: mthomas@countyofglenn.net; planning@countyofglenn.net

Via Email

Andy Popper, Principal Planner

Email: apopper@countyofglenn.net

Re: Notice of Settlement – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Mr. Thomas and Mr. Popper,

This firm represents **Citizens for Responsible Industry** (“Citizens”) regarding the above-referenced Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) (“Project”). On April 15, 2025, Citizens submitted written comments to Glenn County (“County”) on the Project’s March 2025 Mitigated Negative Declaration/Initial Study (“MND”), alleging factual and legal errors in the County’s environmental review of the Project under the California Environmental Quality Act (“CEQA”), Public Resources Code Section 21000 *et seq.*

Citizens is pleased to report that, as a result of direct discussions with SynTech CF1, LLC (“Applicant”), Citizens has entered into a legally enforceable settlement agreement with the Applicant. The Applicant has committed to implementing additional measures beyond those specifically called out in the MND to address several of the environmental concerns raised by Citizens, including, but not limited to: air quality, public health, hazards, and agricultural resources, and asks that the County include the measures as mitigation measures or conditions of approval for the Project. The measures are set forth below.

7836-021acp

A. AIR QUALITY AND PUBLIC HEALTH

- i. **Best Available Control Technology (BACT):** Developer shall apply BACT to the Project's new emissions units and any modifications of an existing emissions unit which result in an emissions increase where the emissions unit's potential to emit is equal to or exceeds the following amounts:

Pollutant	Pounds per Day
Asbestos.....	0.030
Beryllium.....	0.002
Carbon monoxide	500.000
Fluorides.....	15.000
Hydrogen sulfide	50.000
Lead	3.200
Mercury	0.500
Nitrogen oxides	25.000
Particulate matter (PM-10)	80.000
Reactive organic compounds	25.000
Reduced sulfur compounds.....	50.000
Sulfur oxides.....	80.000
Sulfuric acid mist	35.000
Total reduced sulfur compounds	50.000
Vinyl chloride	5.000

- ii. **Offsets:** Developer shall implement emission reductions from existing emission sources at the Project site with a potential to emit non-attainment pollutants or their precursors equal to or exceeding 25 tons per year. Offsets shall be calculated pursuant to Glenn County Air Pollution Control District ("GCAPCD") Regulations, Article III, Sec. 51, and shall be sufficient to offset calendar quarter emission increases of non-attainment pollutants or their precursors associated with the new or modified stationary source.
- iii. **Leak Detection and Repair (LDAR):** Developer shall implement an LDAR program during Project operation which includes regular inspection and monitoring for fugitive emissions, as well as emissions from the Project's point-source release of exhaust from the post-methanator gas separation unit, including but not limited to CO₂ emissions.

B. HAZARDS

- i. The Project's Hazardous Materials Business Plan (HMBP) shall include the following:
1. Detailed, site-specific emergency response protocols, including clear shelter-in place procedures;
 2. Identify and clearly mark evacuation routes from Project facilities;

June 6, 2025

Page 3

3. Implementation of emergency communication systems to notify nearby residents and facilities in the event of an emergency;
4. Project operator shall coordinate with local emergency response teams to ensure a timely and effective response in the event of a catastrophic release, fires, or other hazardous incidents at the Project site;
5. Provide comprehensive worker training consistent with Title 8 CCR Section 5192, including, but not limited to, instruction on the hazardous materials present on-site, methods to reduce exposure risk, and safe handling procedures.

C. AGRICULTURAL RESOURCES

- i. Developer shall preserve a total of 6.3 acres of Prime Farmland at the Project site.

With the Applicant's agreement to implement the additional measures above, the issues raised by Citizens regarding the Project have been addressed and resolved. Citizens hereby supports the Project and requests that the County approve the Project.

Thank you for your attention to this matter.

Sincerely,



Alaura McGuire

ARM:acp