



## Understanding New Requirements for Air Toxics Reporting

California air districts are beginning to adapt recent amendments to the California Air Resources Board’s (CARB) Air Toxics “Hot Spots” Program Emission Inventory Criteria and Guidelines (EICG) and the Reporting of Criteria Air Pollutants and Toxic Air Contaminants Regulation (CTR). This fact sheet is to inform your organization of those regulatory updates, how they apply to the wastewater sector, and for your reference in discussions with air district staff.

**REGULATORY UPDATES:** As part of improving air toxic emissions reporting, the public’s access to the data, and reduction strategies for priority communities, the updates to the EICG and CTR:

- Expand the number of compounds to be validated for monitoring and reporting from a total of ~500 to over 1,000 for permitted waste facilities, including wastewater treatment plants (WWTPs).
- Establish criteria for air monitoring AND an approach for the waste sector (i.e., the “two-step” process) to identify a short list of toxics relevant to WWTPs.
- Identify strategies/timelines for emissions reductions (prioritizing overburdened communities).

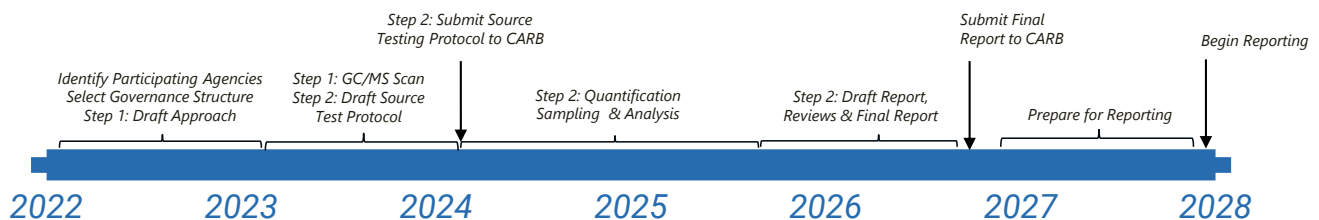
Since most of the 1,000+ compounds do not have approved sampling or laboratory methods and have not been assessed by the Office of Environmental Health Hazard Assessment, health risks associated with these compounds cannot be quantified. In turn, any prematurely reported information will yield erroneous emission estimates, causing confusion and potentially unwarranted alarm for our neighbors.

**WASTEWATER SECTOR IMPACTS & RESPONSE:** CARB approved a phased compliance approach that allows permitted WWTPs to report business as usual through 2028 while the sector executes the two-step process to:

1. Perform a scan of air samples across various treatment plant unit processes to determine detectable compounds (of the 1,000+ compounds).
2. Quantify the emissions of detectable toxic compounds based on an approved sampling and analysis approach (working with air districts and CARB).

The two-step process will take approximately five (5) years and up to \$10 million for the wastewater sector to complete. In the meantime, the wastewater sector is unable to quantify any new air toxic compounds until the completion of the statewide two-step process and must rely upon the results of the two-step process as the “best available data and methods.” In other words, no new air toxics need to be reported until 2029.

The winter/spring of 2022 CASA will work with the membership to establish an oversight and cost-recovery structure for the two-step process. Thereafter, about 20 WWTPs will need to sample emitting unit processes in accordance with approved protocols.<sup>1</sup> A tentative schedule of the two-step process is provided below:



For more information or if you have questions, please contact Sarah Deslauriers at [sdeslauriers@carollo.com](mailto:sdeslauriers@carollo.com) or David Rothbart at [drothbart@lacs.org](mailto:drothbart@lacs.org). Updates are provided as part of CASA’s Air Quality, Climate Change, & Energy Workgroup monthly meetings and an Air Toxics Subgroup has been established that meets as needed.

<sup>1</sup> Scanning and sampling protocols will be developed in collaboration with and approved by local air districts and CARB staff. CASA will lead the coordination and development of the protocols.