

BACWA AIR ISSUES MATRIX

Item	Description	Issues for POTWs	Current Status and Updates	Links	Lead	Next Steps	Effective Date
Fleet Regulations	<ul style="list-style-type: none"> - Heavy Duty Diesel Regulations - CARB's In-use Off-road Diesel Regulation 	<ul style="list-style-type: none"> - Retrofitting requirements for fleets - Reporting requirements for specific sizes of fleets - PM and NO_x requirements for equipment emissions 	<ul style="list-style-type: none"> - ARB extended compliance deadlines for remianing diesel vehicles to December 31, 2011. - Requires fleets to apply BACT to percentage of fleet based on implementation schedule - ARB made amendments to the in-use off-road diesel regulation in December 2010: <ul style="list-style-type: none"> • four year extensions of deadlines • reduction & simplification of annual requirements • making exhaust retrofits no longer mandatory • raising low use threshold to 200 hours (instead of 100) 	http://www.arb.ca.gov/mspr/og/publicfleets/publicfleets.htm http://www.arb.ca.gov/mspr/og/ordiesel/ordiesel.htm	Divya Bhargava		December 2010
Mandatory Reporting of GHGs	<ul style="list-style-type: none"> - CARB's Mandatory Reporting Regulation for Greenhouse Gases: Revisions made to the program to support a greenhouse gas cap-and-trade program and harmonize with U.S. EPA reporting requirements - EPA GHG Mandatory Reporting: Extension of deadline 	<ul style="list-style-type: none"> - Revisions include the following: <ul style="list-style-type: none"> • Reporting threshold lowered from 25,000 metric tons/year of CO₂ to 10,000 mton/yr of carbon dioxide equivalents (CO₂e) • Facilities with emissions between 10,000 and 25,000 mton/yr file an abbreviated report and not required to undergo third-party verification • Cogeneration category (> 1 MW power and 2500 mton/yr of emissions) eliminated - Program requires reporting from large emission sources across a range of industry sectors (there are only a few wastewater agencies in California that exceed the 25,000 ton/yr fossil fuel-based emissions threshold) 	<ul style="list-style-type: none"> - The proposed changes kick in for reporting year 2011 (filed in 2012) - Enforcement of CARB's Cap & Trade rule has been deferred from 2012 to 2013 - CARB had the 2nd 15-day notice for the second round of revisions to the rule - EPA issued a final rule that extends the deadline for reporting 2010 data to September 30, 2011 - New deadline for registering with the electronic GHG reporting tool (e-GGRT): August 1, 2011 	http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep.htm http://www.epa.gov/climatechange/emissions/	Divya Bhargava	Enforcement of CARB's Cap & Trade rule has been deferred from 2012 to 2013	January 1, 2013
Stationary Engine Emissions Regulations	<ul style="list-style-type: none"> - CARB's ACTM for Stationary, CI Engines: Amendments made to the program Purpose: to reduce diesel particulate matter (PM) and criteria pollutant emissions from stationary new and in-use diesel-fueled CI engines. Except as provided in sections 93115.3 and 93115.9, this ATCM applies to any person who owns or operates a stationary CI engine > 50 bhp in CA. 	<ul style="list-style-type: none"> - Emission Limits for New Emergency Standby Engines: requires any new emergency standby engine to meet the 2007 model year or newer emissions limits in the Off-Road Standards, title 13, California Code of Regulations section 2423, for all pollutants. - Tier 4 Emissions Limit and Sell-Through Requirements for Prime Engines: aligns the PM emissions limit for CI engines with the NSPS standard of 0.02 g/bhp-hr. In addition, the amendments align with the NSPS final rule deadlines for installing prime engines from a previous model year. 	<ul style="list-style-type: none"> - Amendments made to title 17, California Code of Regulations sections 93115 through 93115.15, for Stationary, CI Engines on May 19, 2011 	http://www.arb.ca.gov/diesel/statport.htm	Divya Bhargava		May 19, 2011
Portable Engine Emissions Regulations	<ul style="list-style-type: none"> - Tier 0 (non-certified) portable diesel engines phase-out date - Statewide Poratble Equipment Registration Program (PERP): Amendments made to program 	<ul style="list-style-type: none"> - Portable engines may be used on-site at POTWs: An engine moved to more than one location within a facility is portable. It does not have to leave the facility 	<ul style="list-style-type: none"> - On June 21, 2010, CARB proposed an amendment to the ATCM which allowed some of these Tier 0 portable engines to operate until December 31, 2010 - BAAQMD will encourage CARB to post a more definitive compliance date for phase-out of Tier 0 portable diesel engines. 	http://www.arb.ca.gov/portable/portable.htm	Divya Bhargava		

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Addition of Digester Gas to Definition of EPA's New Incinerated Solid Waste Definition	- EPA proposed definition of solid waste: Regulatory Status of Digester Gas, Biosolids Destined for Combustion Units	- Regulatory status of sewage sludge incinerators (SSIs) - Regulatory status of digester gas generated during anaerobic digestion of sewage sludge, and biosolids or biosolids-derived products	- Through a May 13, 2011, policy letter, EPA has clarified that it did not intend to include these gases under its solid waste rules - NACWA recommends that members who generate and burn digester gas in any manner obtain a copy of the May 13, 2011, letter and maintain it in their files should the regulatory status of their gas operations be called into question - In August 2011, NACWA, CASA, & CWCCG met with EPA staff to discuss the potential impacts of a new EPA rule on the clean water community's management of digester gas, and have requested written clarification that will specifically address wastewater digester gas - Awaiting EPA's response on this	http://www.nacwa.org/index.php?option=com_content&view=article&id=1208&Itemid=14	Divya Bhargava	Awaiting clarification letter from EPA	
Status of National Ambient Air Quality Standard (NAAQS) for Ground-level Ozone	- Draft created by EPA in 2008, & was focused on developing new anti-smog standards - EPA proposed stricter standards in January 2011, and reconsidered proposed standard in July 2011	- May affect current or proposed CARB and BAAQMD regulations of ozone precursors (NOx, CO, and VOCs) - Final rule developed by EPA would have established an 8-hour ozone standard of 70 parts per billion (ppb), approximately 7% lower than the 2008 standard of 75 parts per billion	- On September 2, 2011, Statement by the President on the NAAQS for ozone requested that EPA Administrator Lisa Jackson withdraw the Ozone NAAQS draft until further notice - EPA circulated memorandum on September 22, indicating they would soon begin an expedited rulemaking on the implementation of the standards - EPA is due to revisit the ozone standard again in 2013, under the Clean Air Act		Divya Bhargava		
Proposed Climate Change Bay Plan Amendment	- San Francisco Bay Conservation Development Commission (BCDC) Bay Plan Amendment to incorporate the findings of climate change adaptation to protect the Bay environment and essential public infrastructure from the potential impacts of sea level rise	- Bay plan amendmend talks about protecting critical infrastructure (including wastewater treatments plants) from the impacts to sea level rise	- Public workshops were held on May 19th, June 2 nd , and September 1 st 2011, to provide the Commission with the opportunity to directly engage with the representatives from business and environmental communities to better understand their perspectives on the outstanding policy issues, and to allow the public to provide additional input on the draft findings and policies. - BACWA AIR attended the BCDC meeting on May 19 th and September 2 nd , and submitted a comment letter supporting the language in the Bay Plan Amendment about protecting critical infrastructure. - Commission votes on Bay Plan amendment & final resolution of approval on October 6 th , 2011	http://www.bcdc.ca.gov/proposed_bay_plan/bp_amend_1-08.shtml	Divya Bhargava	Commission votes on Bay Plan amendment & final resolution of approval on October 6th, 2011	October 6, 2011
Misc. Equipment Emission Regulations - Boilers, Turbines, etc.	- BAAQMD Regulation 9, Rule 7: Compliance Extensions: NOx and CO from Boilers, Steam Generators & Process Heaters: Changes proposed to regulation - EPA's new emissions standards for large and small boilers and incinerators that burn solid waste and sewage sludge	- various equipment is used on-site for WWTF operations and is also subject to air quality regulation: amendments to compliance dates and options - New Area Source standards do not apply to boilers that burn only gaseous fuels (including biogas) or solid waste. - New Major Source standards do impact boilers that burn gaseous fuels	- Proposed amendments to Regulation 9, Rule 7 adopted on May 4, 2011 - Final rules were published in the Federal Register on March 21, 2011. Effective dates of the rules are delayed until EPA completes its reconsideration of the rules. - On May 16, 2011, EPA announced its next step in allowing time to seek and review additional public input on the final standards - EPA will propose standards by the end of October 2011 and issue final standards by the end of April 2012	http://www.baaqmd.gov/?sc_itemid=D39A3015-453E-4A0D-9C76-6F7F4DA5AED5 http://www.epa.gov/airquality/com-bustion/	Divya Bhargava	- EPA will propose standards by the end of October 2011 and issue final standards by the end of April 2011	May 4, 2011 April 2012

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Funding Opportunities	<ul style="list-style-type: none"> - General funding opportunity tracking for BACWA AIR Members - Includes funding directly for Wastewater projects as well as Water, Alternative Energy, and Energy Efficiency projects that may also be applicable to projects at POTWs - State Water Board's Clean Water State Revolving Fund Program (CWSRF) - California Energy Commissions' Loan Funding for Energy Efficiency and Energy Generation Projects 	<ul style="list-style-type: none"> - Securing funding for much needed projects at member agency sites -The CWSRF program offers low interest financing agreements for water quality projects. Annually, the program disburses between \$200 and \$300 million to eligible projects - The California Energy Commission has announced the availability of funds for low-interest loans for energy efficiency and energy generation projects. Approximately \$3.6 million is currently available 	<ul style="list-style-type: none"> There are no known opportunities at this time - Applications for the CWSRF are being accepted on a continuous basis - Projects with proven energy and/or capacity savings are eligible, provided they meet the eligibility requirements 	<ul style="list-style-type: none"> http://bacwa.org/committees/air-issues-regulations/grant-opportunities http://www.swrcb.ca.gov/water_issues/programs/grants_loans/srf/index.shtml http://www.energy.ca.gov/efficiency/financing/index.html 	Divya Bhargava		