

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 remaining 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/publicfleets/publicfleets.htm http://www.arb.ca.gov/mspr/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) - 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	CARB staff are finalizing the rulemaking during 2011, and the revised regulation is expected to be effective for reporting in 2012	January 1, 2012
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 ACTM 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 Portable 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 ACTM 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		
Addition of Digester Gas to Definition of EPA's New Incinerated Solid Waste Definition	<ul style="list-style-type: none"> - EPA proposed definition of soil waste: Regulatory Status of Digester Gas, Biosolids Destined for Combustion Units 	<ul style="list-style-type: none"> - 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 	<ul style="list-style-type: none"> - 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 will seek more formal clarification of the status of these gaseous fuels. - 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 	http://www.nacwa.org/index.php?option=com_content&view=article&id=1208&Itemid=14	Divya Bhargava	NACWA along with a number of industry groups will be requesting that EPA provide more formal clarification via Federal Register notice on the regulatory status of these gaseous fuels	

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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 and June 2nd 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 19th, and submitted a comment letter supporting the language in the Bay Plan Amendment about protecting critical infrastructure. - The comment letter was included included for the Commissioners during the meeting on June 2nd.	http://www.bcdc.ca.gov/proposed_bay_plan/bp_amend_1-08.shtml	Divya Bhargava	Revised BCDC staff report is expected to be released on July 29, for consideration by the Commission	September 1, 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 that were issued in February 2011	- 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 - EPA is seeking additional public feedback and gathering more information on the final standards (until July 15, 2011), and will issue a stay postponing the effective date of the standards for major source boilers and commercial and industrial solid waste incinerators to allow the agency to continue to seek additional public comment before updated rule is proposed	http://www.baaqmd.gov/?sc_itemid=D39A3015-453E-4A0D-9C76-6F7F4DA5AED5 http://www.epa.gov/airquality/com-bustion/	Divya Bhargava	- EPA gathering public feedback: comments due date	May 4, 2011 July 15, 2011
Funding Opportunities	- 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	- Securing funding for much needed projects at member agency sites	There are no known opportunities at this time	http://bacwa.org/committees/air-issues-regulations/grant-opportunities	Divya Bhargava		