

Report to BACWA Board from AIR Committee (July 2012)

Document Control	Prepared by Divya Bhargava (Project Engineer) and Randy Schmidt (Committee Vice Chair) Reviewed by Nohemy Revilla (Committee Chair) and Jim Sandoval (Project Manager)
Committee Request for Board Action	None at this time.
Committee Agenda Items	None at this time.

Recent Committee Actions:

Recent Committee Actions	<ul style="list-style-type: none"> BACWA AIR has begun the next phase of the AIR Committee (Phase 26). The FY 11/12 was very successful for AIR and we are looking forward to another good year. 14 member agencies have committed to Phase 26 of BACWA AIR. San Bruno/S. San Francisco dropped out this year, so our budget is \$5400 short of last year's.
AIR Website	http://bacwa.org/Committees/AirIssuesRegulations.aspx

News and Updates:

EPA's NAAQS Updated for PM	<ul style="list-style-type: none"> On June 14, 2012, the USEPA proposed to strengthen the National Ambient Air Quality Standards (NAAQS) for fine particle pollution, also known as fine particulate matter (PM_{2.5}). Details of the proposed new fine particle limits can be found at: http://www.epa.gov/pm/actions.html. The EPA rule sets a new NAAQS for PM_{2.5}, but not emission limits for individual sources. It is up to BAAQMD to develop the emission limits for individual sources so the region will meet the NAAQS. As a result on the pending NAAQS for PM_{2.5}, BAAQMD is now regulating PM_{2.5} as a criterion pollutant. When BAAQMD revises there NSR, PSD, and PM_{2.5} rules this summer, any new source with PM_{2.5} emissions over 10 lbs./day will have to install Best Available Control Technology (BACT) for PM_{2.5}. Regulations on existing sources will follow over the next 5 years or so. <ul style="list-style-type: none"> For example, the PM_{2.5} emissions from Central Contra Costa Sanitary District's (CCCSD) existing Multiple Hearth Furnace (MHF) is greater than the 10 lb./day BACT trigger. Because CCCSD's MHFs are an existing source, the BACT requirement does not currently apply to existing sources. As BAAQMD develops PM_{2.5} emission limits for existing sources of PM_{2.5}, any existing source with PM_{2.5} emissions above the new source BACT trigger of 10 lbs/day is likely to get a new PM_{2.5} emission limit. Please see the attached memo written by AIR Vice Chair Randy Schmidt that provides further background.
For more information	http://www.epa.gov/pm/actions.html

Next AIR Committee Meeting: Wednesday, August 15, 2012
Venue: CH2M HILL Office, Oakland

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**NATIONAL AMBIENT AIR QUALITY STANDARD (NAAQS)
PARTICULATE MATTER < 2.5 MICRONS IN DIAMETER (PM_{2.5})
JULY 16, 2012
BY RANDY SCHMIDT**

The existing State and National Ambient Air Quality Standards (NAAQS) for particulate matter < 10 microns in diameter (PM₁₀), for fine particulate matter < 2.5 microns in diameter (PM_{2.5}), and the Bay Area Air Quality Management District (BAAQMD) attainment status are summarized below:

	24-hour	National AAQS	Bay Area Status	State AAQS	Bay Area Status
PM₁₀	24-hour avg	150 µg/m ³	Attainment	50 µg/m ³	Non-attainment
	Annual avg	No std		20 µg/m ³	Non-attainment
PM_{2.5}	24-hour avg	35 µg/m ³	Non-attainment	No std	
	Annual avg	15 µg/m ³	Attainment	12 µg/m ³	Non-attainment

As shown in the above table, there are state and national standards for PM₁₀ and PM_{2.5}. If an air basin does not meet an Ambient Air Quality Standard (AAQS), the air basin is designated non-attainment for that particular standard. Though the California State AAQS tend to be stricter than the NAAQS, there is more flexibility in both time and methods for meeting the California State AAQS than there is for the NAAQS.

The Bay Area Air Quality Management District (BAAQMD) is responsible for meeting both the State AAQS and NAAQS. The Bay Area does not meet any of the State AAQS for PM_{2.5} or PM₁₀ and is designated as a non-attainment area. The BAAQMD is responsible for developing and implementing strategies to meet the State AAQS. As noted earlier, BAAQMD has flexibility in time and methods to meet the State AAQS.

The Bay Area meets the NAAQS for 24-hour PM₁₀ and annual PM_{2.5}, but not for 24-hour PM_{2.5}. In February of 2012, the BAAQMD held a public workshop to regulate 24-hour PM_{2.5} as a criterion pollutant because of the non-attainment status of the NAAQS. BAAQMD is actively working on revisions to their rules to meet the 24-hour PM_{2.5} NAAQS. These rule revisions are targeted for adoption in the summer of 2012.

The recent USEPA proposal to lower the Annual PM_{2.5} NAAQS from 15 to 12 µg/m³ would make the Bay Area non-attainment for the Annual PM_{2.5} NAAQS. Since BAAQMD is already in the rule making process for the 24-hour PM_{2.5} NAAQS, it is not difficult to include the Annual PM_{2.5} NAAQS in the rule making process. This change in the Annual PM_{2.5} NAAQS will have the most impact on existing sources of PM_{2.5}. New or Modified sources of PM_{2.5} will already be required to have the Best Available Control Technology (BACT) for PM_{2.5}. Many existing sources of PM_{2.5} would have to install additional air pollution control equipment for the Bay Area to be in attainment by the USEPA deadline of 2020. The current BACT for PM_{2.5} is a state-of-the-art wet scrubber (i.e. the multi-venturi condensing scrubber) combined with a wet electrostatic precipitator (WESP). Any new or modified source with PM_{2.5} emissions greater than 10 pounds per day, must install BACT.

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BAAQMD has approximately 8 years to come into attainment for the annual and 24-hour PM_{2.5} NAAQS. BAAQMD rulemaking for existing sources usually takes about 3 years with an additional 5 year compliance schedule for a total of 8 years. If BAAQMD follows their normal rule making schedule, existing sources with PM_{2.5} emissions < 10 lbs/day would need to install BACT for PM_{2.5} sometime around 2017. Bay Area Clean Water Agencies (BACWA) members should check their plants for sources of PM_{2.5} which could include baghouses, odor scrubbers, and diesel fueled engines. If the PM_{2.5} emissions are over 10 lbs/day, BACT for PM_{2.5} will have to be installed on those sources sometime in the next 5+ years.