



## **AIR ISSUES & REGULATIONS COMMITTEE**

A Committee of the Bay Area Clean Water Agencies

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### **The AIR Committee's History**

Over the years, the Air Issues & Regulations (AIR) Committee has updated Bay Area Publicly Owned Treatment Works (POTWs) on important air quality and climate change regulatory information and worked with local, state, and federal regulatory agencies to ensure that the viewpoints of both large and small Bay Area POTWs are taken into account. Together, we have proactively assisted in the development of regulatory programs by ensuring that they are based on good science and are physically and financially feasible for our public utilities. We have also shared information, developed comprehensive compliance programs, and formed solid relationships with each other and with our regulatory agencies. These relationships produce universally beneficial results: producing forward thinking input and strengthening our lobbying as regulations impacting Bay Area POTWs are constantly changing. We represent "one voice" to the regulatory agencies, speaking on behalf of the majority of the POTWs in the Bay Area, and public utilities statewide have benefited from our efforts.

### **Phase 28 (FY 2014/15) Scope of Work**

The AIR Committee will continue to condense the vast amount of regulatory news and grant funding opportunities streaming from national, state, and local agencies into bullet points relevant to Bay Area POTWs. Two of the AIR Committee's primary goals in Phase 28 are to continue:

1. Promoting stronger relationships with regulatory agencies as proposed regulations develop; in particular, with the Bay Area Air Quality Management District (BAAQMD) as they roll out updates to Regulation 2 and the Clean Air Plan and review permit applications submitted by several committee members.
2. Providing forums for the exchange of ideas among member POTWs.

To this end, we have integrated relevant field trips into our meetings in recent years. For example, in Phase 27 (FY 2013/14) we held on-site meetings at:

- Santa Rosa Water Reclamation Facility (SRWRF) in September 2013 that included a tour of their composting and biofilter facility, as well as the new combined heat and power facility. This was an excellent opportunity for SRWRF staff to demonstrate two "renewable" programs being implemented.
- BAAQMD's headquarters in San Francisco in February 2014. It was a great opportunity for members to engage directly with three BAAQMD staff who shared their expertise in:
  - ✓ Upcoming revisions to the BAAQMD Clean Air Plan, including discussion of a regional climate protection strategy

- ✓ Recent U.S. Environmental Protection Agency (EPA) amendments to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)
  - ✓ Recent BAAQMD amendments to Regulation 9, Rule 7: Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters
  - ✓ Tips for expediting the BAAQMD permit application process
  - ✓ Tips for updating a facility's emissions in the BAAQMD Emission Inventory
- Central Contra Costa Sanitary District (CCCSD) in April 2014 that included a tour of their solids facility, which houses 2 auxiliary boilers, 1 cogeneration engine, and 2 multiple hearth furnaces. This was an excellent opportunity for CCCSD staff to showcase one of the few, functioning incinerators at Bay Area POTWs.

### **Anticipated Phase 28 Regulatory Activities**

During Phase 28, the AIR Committee will track the following regulatory issues, affecting large and small POTWs, and communicate them to members through bi-monthly committee meetings, regular committee-wide emails, the updated AIR website, and the AIR Issues Matrix:

- Revisions to BAAQMD New Source Review and Title V Permitting Programs (i.e., amendments to District Regulation 2 – Rules 1, 2, 4, and 6)
- Revisions to BAAQMD's Clean Air Plan, including the development of a regional climate protection strategy
- EPA's new NESHAP for RICE
- EPA's new air toxic standards for industrial, commercial, and institutional boilers and process heaters
- Treatment of biogenic emissions under the EPA's Greenhouse Gas (GHG) Tailoring Rule
- California Air Resources Board's (CARB) Mandatory GHG Reporting & Cap-and-Trade Programs
- CARB's Statewide Portable Equipment Registration Program (PERP)
- CARB's Stationary Refrigeration Management Program

As appropriate, we will prepare comment letters in response to the above regulatory activities to call attention to specific issues faced by Bay Area POTWs. For example, we are in the process of developing a comment letter to the BAAQMD regarding cross media issues to be addressed in the updated Clean Air Plan.

We will also keep members up-to-date on the activities of our partner organizations--the new California Association of Sanitation Agencies (CASA) Energy Workgroup and the California Wastewater Climate Change Group (CWCCG)--and the regulatory and policy issues they focus upon.

### **AIR Committee Membership**

We look forward to a productive and successful Phase 28. Please accept this invitation to partner again on air quality and climate change information sharing and advocacy, because our success depends on the continued involvement and support of your agency.

Please fill out the attached membership form and return it to Elyse Engel/CH2M HILL by Friday, May 30, 2014. Thank you in advance for your continued support!

*Nohemy Revilla*  
AIR Committee Co-Chair

*Randy Schmidt*  
AIR Committee Co-Chair



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From:	
Agency:	
Primary Contact:	
Address:	
Telephone:	
Fax:	
Email:	

We are interested in participating in AIR Phase 28: Yes    No

Our current average flow is \_\_\_\_\_ MGD.

We expect to contribute \$ \_\_\_\_\_ for the AIR Committee.  
 (\$600/MGD up to a maximum of \$6,000)

Suggestions/Comments: