Thanks again to Fairfield-Suisun for hosting the March 15th meeting and arranging the tour of the Lystek Organic Materials Recovery Center!

Below is a summary of the discussion and action items (most of which have been addressed since our meeting) for your review and records:

1. BAAQMD Updates

1. The proposed [Regulation 11, Rule 18](http://www.baaqmd.gov/~/media/files/planning-and-research/workshops/2016/1118-and-1216/10142016_rg1118-pdf.pdf?la=en) (Rule 11-18) Risk Reduction of Air Toxic Emissions at Existing Facilities is a hot topic! AIR Committee members met with BAAQMD staff on March 9th to outline POTWs’ concerns with the proposed rule, identified priority action items (including scheduling a follow-up policy level workshop for March 23rd), and emission factor development.

In response to a request by BAAQMD staff during the workshops, the Committee delivered a letter report summarizing specific challenges that POTWs would face in complying with the rule due to budgeting and planning constraints related to being public agencies. The letter report addressed budgeting concerns (since budgets for next year are being developed now and Health Risk Assessment (HRA) fees have not yet been approved) and flexibility in implementation of Rule 11-18.

Data analysis performed by EBMUD indicated the emission factors currently used by BAAQMD overestimate emissions from POTW processes, primarily because of reduced influent concentrations of TACs. A meeting has been scheduled for June 1st with BAAQMD staff to discuss these details and how BACWA can work with BAAQMD to improve their calculations and understanding of the cost-benefit of TBARCT at POTWs.

Courtney is receiving facility Preliminary Prioritization Scores from Carol Allen (BAAQMD) as she completes them, which will be forwarded on to each agency.

Additionally, there is a conflict between GHG reductions and TAC emissions - the Clean Air Plan calls for an increase in biogas generation and use (to reduce fossil fuel use), while also requiring TAC emission reductions. However, combusting biogas results in an emission of formaldehyde (TAC emission). This conflict will be discussed further with BAAQMD staff.
2. Under [Regulation 3](http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/workshops/2017/reg-3/rg03_ln_031617-pdf.pdf?la=en), BAAQMD is proposed to increase fee revenue to recover costs for implementing and enforcing regulatory programs for stationary sources:
	* 1. Approximately 7% increase in fees overall for FY 17-18
		2. New Risk Assessment Fee for HRAs under Rule 11-18
		(maximum fee $100,000 per facility)
		3. For more than 3 HRA scenarios, applicants to pay additional fees
		4. New Fees for Risk Reduction Plan (under Rule 11-18) $1,500 - $32,000 depending on number of sources
3. [Regulation 6, Rule 1](http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/workshops/2017/rg0601-pdf.pdf?la=en) - Proposed draft amendments to Rule 6-1 address particulate matter emissions from dirt and other solid materials that are tracked onto roadways, from roofing asphalt, and from storage and handling of bulk materials. The Air District has also drafted a new umbrella regulation for particulate matter rules to provide a consistent set of general provisions, definitions, and test methods. The proposed revisions to Rule 6-1 are tentatively scheduled for Board Adoption in October 2017. Two years after adoption, revisions to Rule 6-1 to reduce the allowable Total Suspended Particulate (TSP) concentration and mass emission rate limits take effect.

2. Climate Change Updates

1. BACWA drafted and submitted a comment letter on BAAQMD's Draft Clean Air Plan March 9th and received positive responses from BAAQMD April 7th to work together on the concerns raised in the comment letter. The final [Clean Air Plan](http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans) was adopted April 19th. The attached spreadsheet has been updated to show the control measures by sector that may impact POTWs and will be implemented over time to achieve the goals of the 2017 Clean Air Plan - protecting the public and the climate.
2. Regarding the AB 32 ["2030 Target" Scoping Plan](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf) update, BACWA will support CASA's comment letter on the January Draft. The final document will be release prior to the Boarding hearing scheduled for June 22nd-23rd.
3. ARB has partnered with CEC and NASA's Jet Propulsion Laboratory to conduct a methane "hot spot" flyover survey across the state. In reviewing the data, we have found that POTWs are generally low sources of methane, especially compared to natural gas facilities. (See aerial photo in slides).
4. We also discussed POTW's role in short-lived climate pollutant (methane) reductions under SB 1383. The final proposed SLCP Reduction Strategy references POTWs as part of the solution in diverting organic waste (i.e., food waste) from landfills to existing anaerobic digesters to co-digest with solids and generate biogas. SB 1383 mandates diversion of organic waste from landfills and is looking to incentivize production and beneficial use of biogas (to avoid wasting a resource). CalRecycle is currently leading the informal rulemaking through 2017 and formal rulemaking through 2018 in support of SB 1383. CalRecycle is hosting the next set of SB 1383 Workshops (to discuss implementation of short-lived climate pollutant reducing strategies) May 17th and 25th – the agendas for each have now been posted. Links to meeting details are provided below – you can attend via [webcast](http://www.calrecycle.ca.gov/Broadcast/) as well!
	* 1. [May 17th workshop](http://www.calrecycle.ca.gov/Actions/Documents%5C77%5C20172017%5C1906%5CDraft%20May%2017%20Agenda.pdf) will be in Sacramento, 10:30 am – 4 pm, at Cal/EPA Building, Byron Sher Auditorium, 2nd floor, 1001 I Street. FYI: Greg will attend and provide a summary during our meeting this Thursday.
		2. [May 25th workshop](http://www.calrecycle.ca.gov/Actions/Documents%5C77%5C20172017%5C1907%5CDraft%20May%2025%20Agenda.pdf) will be in Oceanside, 10 am – 3:30 pm, at City Council Chambers 300 North Coast Highway.

The next BACWA AIR Committee meeting is scheduled for June 21st at BAAQMD's headquarters - their staff will provide updates on topics of choice.

Feel free to contact either of us if you have any questions or items you want to share with the Committee. We will be in touch regularly with updates between meetings.