



BACWA - BAAQMD Workshop Summary: Impact of Proposed Rule 11-18 on Bay Area Wastewater Treatment Facilities

Date: March 9, 2017
Time: 10 AM - 12 PM
Location: BAAQMD Office - 375 Beale Street, Suite 600, San Francisco, CA 94105
Attendees: Victor Douglas, Greg Nudd, Carol Allen, Jaime Williams, Sanjeev Kamboj, and Brenda Cabral (BAAQMD)
Dave Williams (BACWA); Laura Pagano and Nohemy Revilla (SFPUC); Chris Dembiczak (EBMUD); Dean Eckerson (Delta Diablo); Lori Schectel, Randy Schmidt, and Rita Cheng (CCCS); Ken Davies (San Jose), Mike Connor (EBDA), Courtney Mizutani (Mizutani Environmental), Sarah Deslauriers (Carollo)

- 1) Victor Douglas provided Jack Broadbent's availability for holding a separate meeting to discuss policy level issues. This workshop's focus is on the technical and economic issues related to the proposed Rule 11-18.
- 2) BAAQMD staff (Victor Douglas and Carol Allen) provided an overview of the proposed Rule 11-18 requirements including the health risk assessment process, the factors that go into the prioritization score (emissions factors, toxicity, and proximity to receptors), the draft TBARCT list for sewage treatment operations, and explained other specific elements:
 - a) The prioritization score is based on actual annual emissions. Units operated on an intermittent basis are assessed accordingly, using health risk methodology established by the Office of Environmental Health Hazard Assessment (OEHHA).
 - b) The importance of diesel particulate matter (PM) emissions from POTW standby generators (based on the Staff Report) is less than anticipated. BAAQMD is concerned about emissions of benzene, formaldehyde, perchloroethylene, chloroform, methylene chloride, hydrogen sulfide, and diesel PM. The emission sources of concern are listed below (by highest to lowest impact/priority):
 - i) Fugitive emissions from POTW processes (volatiles) and Incinerators
 - ii) Engine stacks (formaldehyde and benzene)
 - iii) Standby generators (diesel PM)
 - c) Implementing TBARCT does not necessarily accomplish a risk less than 10:1,000,000, but will satisfy the Rule requirement.
 - d) Facilities that have already implemented TBACT may not require TBARCT.
 - e) BAAQMD intends to provide/allow for flexibility to POTWs in the application of reduction measures (under section 11-18-402.1, Risk Reduction Plan Submission Requirements).
 - f) BAAQMD would like BACWA members to provide input on:
 - i) Emission factors to ensure accuracy of the emissions inventory estimates and prioritization scores.

- ii) Review of the draft prioritization scores (BAAQMD will provide the draft calculation sheets).
 - iii) TBARCT implementation cost estimates and impacts to the schedule of POTW projects and rate payers - BAAQMD requested an overview of the POTW master planning process and frequency of updates to those planning efforts, including regulatory considerations, cross media issues, rate payer impacts, Prop 218 considerations, CIP implementation schedule and transparency, the Board process, etc., by the end of March.
 - iv) The need for flexibility in the implementation of TBARCT (i.e., timeline).
 - v) Review of the draft CEQA/EIR document.
 - vi) The fees required by BAAQMD to do the implementation and enforcement of the Rule (under Regulation 3).
 - vii) Potential sampling approach to better understand emissions from treatment processes or existing data from POTWs to better understand the actual emissions (BAAQMD will accept data from onsite sampling efforts).
- g) The Rule may be adopted this summer (instead of May).
- 3) Various BACWA members provided insight on the impact of Rule 11-18 on POTWs, including summaries of:
- a) Wastewater in the Bay Area by Dave Williams.
 - b) Impact on wastewater facility planning and implementation of projects across the Bay Area:
 - i) San Francisco Public Utilities Commission Capital Improvement Plan Impacts by Laura Pagano and Nohemy Revilla.
 - ii) Impacts of T-BARCT implementation on project costs and schedules at Central Contra Costa Sanitary District by Randy Schmidt, Rita Cheng, and Lori Schectel.
 - iii) New scrubber installation costs at East Bay Municipal Utility District by Chris Dembiczak.
 - iv) Potential conflict with State & Bay Area climate related goals for agencies considering renewable energy projects by Sarah Deslauriers and Lori Schectel.
- 4) The Workshop concluded with a summary of **priority action items**:
- a) Schedule a meeting with Jack Broadbent to discuss policy level issues.
 - b) Provide a list of BACWA member agencies to Carol Allen to generate the prioritization score calculation sheets for each agency to review and provide input on the emissions inventory.
 - c) Provide an overview of the POTW master planning process and frequency of updates to those planning efforts, including regulatory considerations, cross media issues, rate payer impacts, Prop 218 considerations, CIP implementation schedule and transparency, the Board process, etc., by the end of March. This document should include a summary of the TBARCT implementation cost estimates and overall impacts to the schedule of POTW projects and rate payers.