



## BACWA-BAAQMD Annual Meeting Summary

**Date:** June 21, 2017  
**Time:** 11 AM - 3 PM  
**Location:** BAAQMD Office - 375 Beale Street, San Francisco, CA 94105  
**Attendees:** Victor Douglas, Guy Gimlen, Sanjeev Kamboj, Ronald Pilkington, Robert Cave, Carol Allen, Brenda Cabral, Simrun Dhoot, Idania Zamora, Flora Chan, Alfonso Borja, Alison Kirk (BAAQMD); Dave Williams (BACWA ED); Laura Pagano, Meei-Lih Ahmad, and Nohemy Revilla (SFPUC); Randy Schmidt and Rita Cheng (CCCSO); Ron Hipkiss (FSSD); Tim Grillo (USD); Norman Domingo (SVCW); Karin North, Samantha Engelage, and Kelsi Oshiro (Palo Alto); Jason Nettleton (San Jose); Rita Miller and Heaven Moore (Santa Rosa); Melody Tovar and Stephanie Smallwood (Sunnyvale); Amanda Roa (Delta Diablo); Brian Whitaker (CH2M Hill); Courtney Mizutani (Mizutani Environmental); Sarah Deslauriers (Carollo)  
Via phone: Ken Davies (San Jose)

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Each summer the Bay Area Clean Water Agencies' Air Issues and Regulation Committee (BACWA AIR) meets with the Bay Area Air Quality Management District (BAAQMD) to discuss hot topics. Notes are provided below by agenda item.

### 1) **Clean Air Plan**

BAAQMD staff (Idania Zamora) presented an overview of the Clean Air Plan, the overall goals and relevant elements to POTWs (presentation attached). She stated that BAAQMD would like to conduct more research on POTWs to better understand methane and nitrous oxide emissions (under control measure WR1). The Air District noted five measures (SS16, WA1, WA2, WA3, and WR1) to be prioritized for implementation. BAAQMD expressed willingness to work directly with BACWA members through the development and implementation of measures to inform the process. BAAQMD will convene a methane expert workgroup and recommends BACWA members participate in the workgroup, contribute comments as opportunities arise, and share about any pilot projects that may inform BAAQMD on issues related to the Clean Air Plan.

BAAQMD stated that they see no conflict among control measures within the Clean Air Plan - saying they expect control measures SS16 (Basin-Wide Methane Strategy) and WR1 (Limit GHGs from POTWs) to be coordinated. Staff did not address the conflict between SS20 (Air Toxics Risk Cap and Reduction from Existing Facilities) and WR1 (Limit GHGs from POTWs) for POTWs.

BACWA developed Handout 1 (attached) to list and summarize those Control Measures that are relevant to POTW. This list is not only for BAAQMD's knowledge, it is also for BACWA members' use to plan for potential future restrictions and/or changes in operations and timeline for potential capital improvement projects.

2) **Particulate Matter (Regulation 6, Rule 1)**

BAAQMD is proposing a new umbrella regulation, "Regulation 6: General Provisions, Definitions and Test Methods," as well as draft amendments to Regulation 6, Rule 1: General Requirements and other new rules under Regulation 6. The requirement to reduce the total suspended particles concentration and mass emission limits just two years after adoption could directly impact a number of POTWs. BAAQMD staff (Guy Gimlen) presented an overview and answers to questions (presentation attached). Regulation 6 is unlikely to impact POTWs in general and will follow up with CCCSD to ensure it is not applicable to their incinerators.

BAAQMD discussed dust caused by truck track-out from construction sites or facilities that receive high frequency of truck traffic per day (i.e., >15 trucks per day) may trigger compliance under this regulation (e.g., screens, using mist or plants to serve as wind screens, covering conveyor belts, etc.). Since the majority of facility roads are paved, this is unlikely to impact POTWs.

Particulate matter precursors include sulfur dioxide and ammonia. BAAQMD would like to understand ammonia sources and management at POTWs better to improve their inventory. Specifically, staff is concerned about biosolids and compost facilities since they are finding spikes in ammonia around these facilities.

3) **Proposed Rule 11-18 - Reduction of Risk from Air Toxic Emissions at Existing Facilities**

BAAQMD staff (Carol Allen) provided a summary of the Proposed Rule 11-18 (adoption planned in late September 2017), as well as a status update on the collaborative effort between BACWA members and BAAQMD staff to update POTW prioritization scores (with current influent flow and concentration data, and the current proximity adjustment factors), as well as identify the need for updating specific emission factors.

Once prioritization scores have been updated, if a POTW's score is >10 then the Air District can work with POTWs to ensure the final score is accurate based on specific inputs. If the final score is >10, then a health risk assessment (HRA) must be performed. The Air District will work with its own consultants to perform HRAs. The surrounding community must be notified and procedures will be developed by the Air District for facilities (POTWs) to follow.

This process and the air pollution control equipment that is considered in compliance with Rule 11-18 will be reviewed every 10 years.

NOTE: As required by AB 197, toxic air emissions will be posted online at [CARB's Pollution Mapping Tool - Sources in Your Community](#) website beginning January 1, 2018.

4) **Permits for Temporary Pilot Test Projects**

BACWA and BAAQMD discussed the potential for developing a process to provide permits for temporary pilot projects. BACWA members suggested that BAAQMD consider:

- a. Temporary stand-alone permits.
- b. A separate HRA for a temporary stand-alone unit.
- c. Although dated, consider South Coast Air Quality Management District' procedures for Research Projects as a starting point (refer to Handout 2). BAAQMD staff requested

BACWA provide several examples of pilot projects that have been approved by Rule 441 under SCAQMD and provide the context of those projects, as well as for projects that BACWA members are considering. BAAQMD staff needs to know the characterization of emissions, conditions of the project, and overall context explaining why the project is being considered.

BAAQMD staff also mentioned there are several options in place that may be sufficient depending on the project type and duration. The options staff listed include:

- a. An accelerated permit process
- b. Alteration - project that does not result in a change of emissions.
- c. Portable Equipment Permit
- d. Approval for research through the Enforcement Group - if existing facilities are being used and there are only changes in operations, then the Enforcement Group could grant approval for research.

If it is a short term project ( $\leq 3$  years), an HRA is likely to be required under the current system.

5) **Organic Waste Diversion in support of ARB's Short-Lived Climate Pollutant Reduction Strategy** (refer to Handout 3)

BACWA provided an update to BAAQMD staff on the impact of Senate Bill 1383 on POTWs - SB 1383 mandates 75% diversion of organic waste from landfills statewide by 2025 in effort to reduce methane (a short-lived climate pollutant, SLCP) from landfills and incentivize an increase in production of biogas. The SLCP Reduction Strategy calls on POTWs with excess anaerobic digestion capacity to be part of the solution by accepting food waste to co-digest it with solids to generate biogas and beneficially use it as a transportation fuel (offsetting fossil fuel based transportation fuel). However, the draft definition of organic waste includes "biosolids, sludges, and digestate" and the Reduction Strategy is silent on how to handle the resulting biosolids from co-digestion with food waste. Given over 50% of biosolids in the Bay Area are sent to landfills to be used as alternative daily covers, this presents a serious near-term challenge.

BAAQMD staff recommended looking into the new LACSD compost facility to understand that operation and consider a similar operation in northern California.

6) **Action Items:**

- a. BAAQMD staff requested BACWA provide several examples of pilot projects that have been approved by Rule 441 under SCAQMD and provide the context of those projects, as well as for projects that BACWA members are considering.