



BACWA AIR Committee Meeting Agenda

Date: June 8, 2018
Time: Meeting - 10 AM - 12:30 PM (lunch provided at noon)
Tour - 12:30 - 1:30 PM
Location: City of Palo Alto RWQCP- 2501 Embarcadero Way, Palo Alto, CA 94303
Call-in: (866) 909-9493
Participant Code: 977 213 8504 #

- 1) **Introductions (15 min)**
- 2) **GHG Updates (30 min)**
 - a) SB 1383: Short-Lived Climate Pollutant (SLCP) Reduction Implementation - Draft Regulation Update
 - b) BAAQMD's Basin-Wide Methane Strategy and Tentative Schedule
 - i) Regulation 13, Rule 1 (Rule 13-1): Significant Methane Releases
 - (1) Schedule for rule development
 - (2) Short-term need: Drafted Input from Wastewater Sector on digester maintenance and biogas management
 - (3) Long-term need: Best Management Practices document for digester gas venting
 - ii) Composting and Organic Waste Operations Rule (includes anaerobic digestion)
BAAQMD's Regional Conversation Monday, June 25, "Developing a Sustainable Organic Waste Recovery Sector"
- 3) **AB 617: Community Air Protection Program - ARB and Local Air Districts (15 min)**
- 4) **BAAQMD Rule Updates (45 min)**
 - a) Rule 11-18: Reduction of Risk from Air Toxic Emissions at Existing Facilities Update
 - b) Introduction to the Technology Implementation Office efforts
- 5) **Upcoming Meeting Preparation (15 min)**
 - a) BACWA-BAAQMD Annual Meeting Topics (see next page)
375 Beale Street, San Francisco, CA 94105: August 6th, 10 am - 2 pm
 - b) BACWA-BAAQMD-RWQCB Meeting Topics (see next page)
- 6) **Lunch (12 - 12:30) and Open Discussion**
- 7) **Tour Palo Alto RWQCP's Incineration Facility (12:30 - 1:30 pm)**

Walking tour. Closed-toe shoes, hard hats, and vests are recommended. Palo Alto also has some fancy bright orange hard hats in case you forget. ☺



Potential topics for the Annual BACWA-BAAQMD Meeting in August 2018:

Basin-Wide Methane Strategy (and SB 1383 Short-Lived Climate Pollutant Reduction)

- Large methane leaks
- Composting
- Organic waste operations
- Anaerobic digestion at WWTPs

Rule 11-18: Reduction of Risk from Air Toxic Emissions at Existing Facilities

Standard Permit Conditions

BACWA-BAAQMD-RWQCB Meeting in November 2018 to discuss cross-media issues:

REQUEST: Please think ahead about examples (at your organization) in planning or implementation of a project, where the driver to meet RWQCB objectives has triggered a challenge either with BAAQMD or in meeting a BAAQMD objective (or vice-versa).



AIR ISSUES & REGULATIONS COMMITTEE
A Committee of the Bay Area Clean Water Agencies

Quarterly Meeting
June 8, 2018

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Agenda

- Introductions
- GHG Updates
- AB 617 – ARB & Local Air Districts
- BAAQMD Rule Updates
- Upcoming Meeting Preparation
- Lunch & Open Discussion
- Tour Palo Alto RWQCP's Incineration Facility



AIR ISSUES & REGULATIONS COMMITTEE
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INTRODUCTIONS

GHG Updates

- SB 1383 Regulation (short-lived climate pollutant reduction):
Statewide Methane Reduction Organic Waste Diversion &
Biogas Production
- BAAQMD Basin-Wide Methane Strategy
 - Rule 13-1: Significant Methane Releases
 - Composting & Organic Waste Operations
(including anaerobic digestion)

SB 1383: SLCP Reduction Strategy Implementation

- Methane Reduction:
 - 40% by 2030 (relative to 2013)
- Organics Diversion from Landfills:
 - 50% by 2020 (relative to 2014)
 - 75% by 2025 (relative to 2014)
- Increase in Production/Use of Biogas:
 - State agencies to consider/adopt policies and incentives
 - CEC to incorporate in the 2017 Integrated Energy Policy Report
 - CPUC to consider policies in support of in-State biogas production/use
- Rule to be adopted by end of 2018



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SB 1383: CASA Comments on Draft Regulatory Text

- Land application of biosolids is included as recycling option
- Ability to dispose of sewage sludge in a landfill on a temporary emergency basis
- Must have assurance organic feedstock is clean
- Set statewide standard for land application and beneficial use of biosolids. US EPA's federal standards in 40 CFR part 503 or SWRCB's Statewide General Order.
- Must have assurance markets exist for the use of the biogas. Require set volumes of in-state biogas from anaerobic digestion be procured by Investor and Publicly Owned Utilities (IOU/POU).
- Next draft to be released late summer



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UPDATE...Remaining Issues with Proposed Language

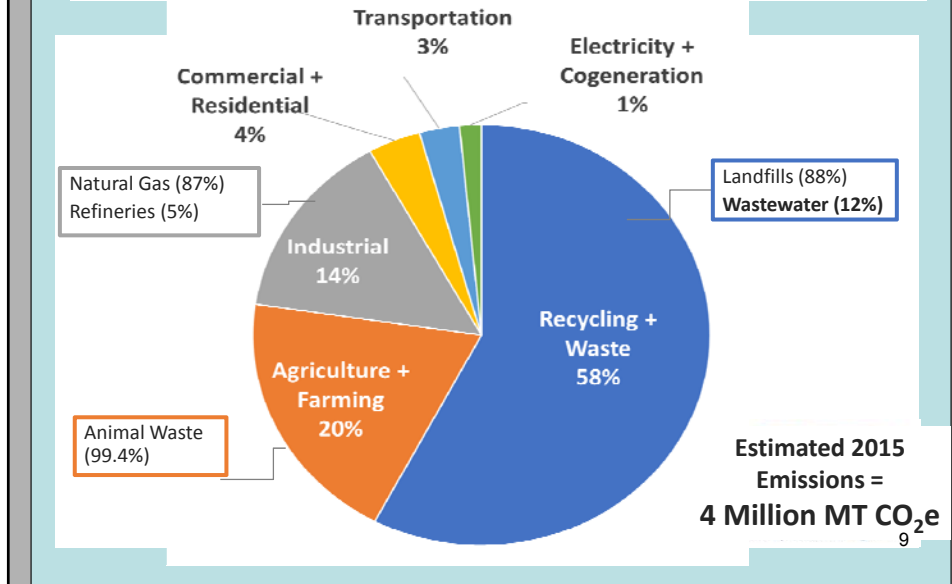
- Limits on local ordinances with good intent
- Includes conflicting authorities (ordinances still allowed, even though other section precludes them)
- Biosolids must be anaerobically digested and/or composted to qualify as landfill reduction
- Language could be construed as disallowing other treatment technologies and management other than land application
- Seek clarity that jurisdictions and POTWs can negotiate whether biosolids can continue to be landfilled



BAAQMD'S BASIN-WIDE METHANE STRATEGY



Methane in the Bay Area



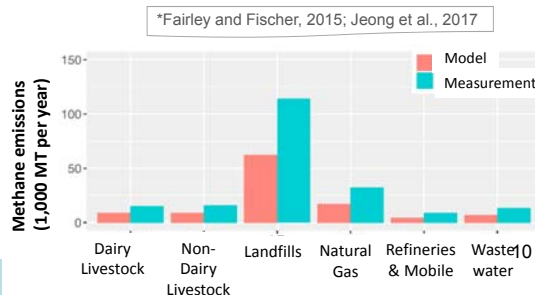
Methane in the Bay Area *Scientific Findings*

Recent Bay Area "top down" studies*

- Methane emissions are **1.3 – 2.3 times higher** than Air District inventory for 2015
- **Biological methane dominates** methane emissions in the Bay Area (82%), followed by natural gas (15%)
 - Landfills appear to be dominant source of biological methane

Knowledge Gaps

- Composting
- Anaerobic Digestion
- Refineries





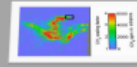
Methane Research Efforts Led by the Air District

TIERED APPROACH

Aircraft-based flux estimates
with in situ measurements



Aircraft surveys with visible/infrared
imaging spectrometer (AVIRIS-NG)



On-site leak detection (mobile van)
and flux evaluation (infrared cameras)



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Basin-Wide Methane Strategy 2018 Methane Rules

REG 13-1 SIGNIFICANT METHANE RELEASES

PURPOSE Allow the Air District to compel facilities to fix major leaks; will act as **backstop** while source-specific rules are adopted

CONCEPT Prohibits methane releases throughout District

SCHEDULE

WORKSHOPS
APRIL 2018

TO BOARD
2018



NEW RULES COMPOSTING & ORGANIC RECOVERY OPERATIONS

CONCEPT Adopt a suite of rules that address emissions from storing, transferring and processing organic materials at composting, anaerobic digestion and other waste-related facilities such as landfills.

SCHEDULE
(first rule)

WORKSHOPS
2018

TO BOARD
2018



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Regulation 13, Rule 1: General Methane Leak Prohibition

Establish limit for methane leaks across all Bay Area sources

Background

- Aliso Canyon leak released ~2.4MMTCO₂e during 2015-2016
- Air District Rule 8-2 prohibits large leaks of organic emissions (15 lbs/day and 300 ppm) throughout District *but exempts natural gas*

Purpose

- To allow Air District to take prompt action in case of large leaks
- To serve as a **backstop** while source-specific rules are adopted

How will it work?

- Operators will need to fix leaks **>10,000 ppm and 10 lb/day**

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Basin-Wide Methane Strategy *Summary of Regulatory Efforts*

- 2018 • Drafting Regulation 13, Rule 1 (Rule 13-1):
Significant Methane Releases
- Composting and Organic Waste Operations Rule
(including anaerobic digestion)
- 2019 • Wastewater and Anaerobic Digestion Rule?

Short-term needs:

- Input on digester maintenance biogas management
- Attend June 25th regional forum on Organics Recovery

Long-term need:

Draft Best Management Practices for digester gas venting

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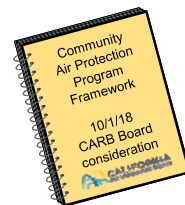
Upcoming important dates:

- Release of first draft of BAAQMD's Rule 13-1 expected June/July 2018:
 - Definitions
 - Measurement procedures
 - Mitigation options
- **Statewide Compost White Paper Development** – CAPCOA/Air Districts, CARB & CalRecycle
 - June 27th, 10 am – 2 pm: Yolo Solano AQMD
 - June 29th, 10 am – 2 pm: South Coast AQMD
 - FOCUS: Air quality permitting and regulatory issues for expanding existing and siting new compost facilities



AB 617: Community Air Protection Program (non-vehicular)

- Harmonize community air monitoring & local emissions reduction programs
- By October 1, 2018, CARB must set direction for:
 - Assessment of community exposure (prioritize)
 - Establish criteria for air monitoring
 - Methods for identifying source contributions and strategies for emissions reduction
- By April 2019 to establish data exchange standards
- By October 2019:
 - CARB to establish emission reduction targets, schedule, & enforcement programs
 - Air Districts to submit to CARB annual progress reports (facilities to report to Air Districts to begin)



AB 617: Community Air Protection Program (non-vehicular)

- Workshop notification sent to members mid-May
 - May 30th – Sacramento & via webcast
 - May 31st – Oakland
 - June 5th – San Joaquin Valley (Fresno)
 - June 7th – Los Angeles
- Proposed (uniform) reporting requirements for TACs and CAPs will apply to facilities that:
 - Report GHGs to CARB per Section 38530 of H&SC
 - Emit 250+ tpy of any nonattainment pollutant or precursor
 - Have a “high” prioritization score per Section 44360 of H&SC

Portable Equipment Registration Program (PERP)/ Portable Engine ATCM Update

- PERP Regulation and the Portable Engine ATCM Amendments Taking Effect Soon (likely first quarter 2019)
- Upcoming CARB Led Training:
 - CARB is conducting a series of trainings -the next local ones are scheduled for June 13 (San Leandro) and June 14 (Santa Rosa)
 - training includes discussion of the following topics: applicability and exemptions, application process, registration eligibility, administrative requirements, fleet emission requirements, and enforcement. Portable equipment registrations will be reissued with new regulatory conditions as permits come up for renewal.

BAAQMD Topics

- Regulation 11, Rule 18:
Reduction of Risk from Air Toxic Emissions at Existing Facilities
- BAAQMD Technology Information Office



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Rule 11-18: Risk Reduction from Air Toxic Emissions at Existing Facilities

- Purpose:
Protect public from toxic air contaminants at existing facilities
- Sources at POTWs:
 - Process emissions
 - Engines and incineration
 - Standby generators (Generator only facilities exempt if RAL < 250)
- Requires:
 - BAAQMD conduct Health Risk Assessments (30-day review)
 - Risk Reduction Plan development
 - Implementation of Risk Reduction Measures (5 years to implement)
 - Phased Implementation based on cancer prioritization number



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Rule 11-18: Risk Reduction from Air Toxic Emissions at Existing Facilities

- Status Update:
 - 11-18 Implementation Working Group to meet quarterly
 - Technical Dispute Resolution Committee members tentatively identified (active and retired regulators from other Air Districts)
- Potential Next Actions:
 - Take steps to reduce emissions inventory values
 - Verify emission calculations methodology with permit engineer & update concentration data as appropriate
 - Monitor progress of 11-18 Phase 1 first in program



BAAQMD Technology Information Office

- Mission Statement: Catalyze innovation to combat climate change by incentivizing disruptive, low-cost technologies that reduce greenhouse gas emissions for mobile and stationary sources
- Revolving loan fund can provide zero/low-interest financing for facilities like POTWs to adopt new technologies that reduce GHG emissions
- Climate Technology Marketplace event at the [Global Climate Action Summit](#) (Sept. 12-14 in San Francisco) to bring together technologies from around the world to meet with facilities in the Bay Area



Upcoming Meeting Preparation

- BAAQMD Annual Meeting Topics:
August 6th
- BACWA-BAAQMD-RWQCB Meeting Topics:
November



BAAQMD Annual Meeting Topics: August 6th

- Basin-Wide Methane Strategy (relation to SB 1383 Short-Lived Climate Pollutant Reduction Implementation)
 - Large methane leaks
 - Composting & organic waste recovery operations (including anaerobic digestion)
- Rule 11-18: Reduction of Risk from Air Toxic Emissions at Existing Facilities
- AB 617 Implementation
- Standard Permit Conditions
- Invite BAAQMD Technology Implementation Office



BACWA-BAAQMD-RWQCB Meeting Topics: November

- **Purpose:** Address conflicting goals/regulations between BAAQMD and the SWRCB/Regional Board
- **Our Task:** Provide examples & develop specific “asks” for upper management of BAAQMD & the Regional Water Board
- Conflicts or issues discussed to date:
 - Petaluma (ATC permit process)
 - San Jose (permit process)
 - San Francisco (CIP improvements wrt Rule 11-18)
 - Diversion of food waste to POTWs to decrease GHGs at landfill & increase biogas production VS local limits on H₂S & formaldehyde

*None of these
address BAAQMD-
RWQCB conflicts!*



LUNCH & OPEN DISCUSSION



Join us for the Tour!

- Palo Alto RWQCP's Incineration Facility



THANK YOU FOR JOINING US!

