



BACWA - BAAQMD Annual Meeting Summary

Date: August 6, 2018
Time: 10 AM - 2 PM
Location: BAAQMD Office - 375 Beale Street, San Francisco, CA 94105
Attendees: Simrun Dhoot, Idania Zamora, Carol Allen, Brenda Cabral, Flora Chan, Alfonso Borja, Derrick Tang, Brian Butler, Lucian Go, and David Joe (BAAQMD); Dave Williams (BACWA ED); Lorien Fono (BACWA); Laura Pagano and Meei-Lih Ahmad (SFPUC); Lori Schectel, Randy Schmidt, and Rita Cheng (CCCSD); Ron Hipkiss (FSSD); Tim Grillo (USD); Norm Domingo (SVCW); Samantha Engelage and Dan Patten (Palo Alto); Jason Nettleton and Jose Guerrero (San Jose); Chris Dembiczak (EBMUD); Cameron Kostigen-Mumper (Sunnyvale); Heather Johnson (Santa Rosa); Amanda Roa (Delta Diablo); Leah Walker and Jason Beatty (Petaluma); Brian Whitaker (Jacobs); Courtney Mizutani (Mizutani Environmental); Sarah Deslauriers (Carollo)

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

1) Basin-Wide Methane Strategy

Idania Zamora (BAAQMD staff) presented an update on the Basin-Wide Methane Strategy (presentation attached). BAAQMD supports the state's target to reduce methane by 40% by 2030 (relative to 2013 levels) and has the authority to regulate methane (not carbon dioxide, however, due to AB 398). Their inventory shows methane as 10% of the Bay Area's total greenhouse gas emissions, and wastewater is estimated to account for only 6% of that methane. For comparison, landfills represent 51% of the Bay Area's methane. BAAQMD also supports the state's organics diversion goals in effort to achieve methane reductions. While BAAQMD would like to achieve methane reductions, they do not want to see a net increase in greenhouse gas emissions related to projects diverting organic waste from landfills. BAAQMD also does not want to be overly restrictive on stationary sources, causing materials to be transported further away leading to an increase in truck traffic and related emissions. The Methane Expert Panel will reconvene in fall to discuss these items.

BAAQMD is developing (new) Rule 13-1: Significant Methane Releases. Public workshops are anticipated to be scheduled in late August/September, with the rule anticipated to go to the Board in late 2018. Currently, there is discussion of limited exemptions for repair and/or maintenance events (including digester cleaning operations). BAAQMD would like to meet with POTWs again in the next month. BACWA has submitted summary information on anaerobic digester cleaning procedures to help inform development of this rule. BAAQMD contact for this rule development is William Saltz. Comments may be submitted at any time.

BAAQMD is planning the development of new Rule 13-2: Organic Material Handling. Public workshops are anticipated to be scheduled in fall, with the rule anticipated to go to the Board in 2019. This rule (includes anaerobic digestion) is expected to have three parts: 1) recordkeeping

and reporting (consistent with AB 901), 2) registration and permitting, and 3) best management practices. Monitoring requirements and methods will be discussed – BAAQMD wants to work jointly with stakeholders. Workshops are anticipated in fall 2018. BAAQMD contact for this rule development is Robert Cave.

BAAQMD is planning the development of a new Rule 13-3: Composting Operations. Public workshops are anticipated to be scheduled in fall, with the rule anticipated to go to the Board in 2019. This rule is expected to be process based. It may be developed in conjunction with Rule 13-2. BAAQMD contact for this rule development is Robert Cave.

Stakeholder input early is most helpful.

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

Carol Allen (BAAQMD staff) presented an update on Rule 11-18 (presentation attached). Carol reviewed the flow chart for implementation of the rule and presented the draft Implementation schedule. She also confirmed POTWs are in Phase II. BAAQMD will begin data review in mid-2019 and health risk assessments in 2020. Risk reduction plans would then be due within 2021-2024. Final implementation of risk reduction measures would follow in 2026-2029 (for a 5-year schedule). Best Available Retrofit Technology for Toxics (TBARCT) requirements will be coordinated between Rule 11-18 and AB 617, which requires air districts to adopt an expedited schedule for implementation of BARCT at industrial sources subject to CARB's Greenhouse Gas Cap-and-Trade requirements. A draft TBARCT workbook document is under development and being review by the Technology Implementation Office. TBARCT has a cost effectiveness consideration that TBACT does not have; there is no cost effectiveness value set yet, especially for government agencies.

Last year, Virginia Lau (BAAQMD) reached out to several POTWs for early participation in data gathering. The BAAQMD planning group is looking to expand this data gathering to all POTWs to review and update data. BAAQMD will send a request out to facilities to verify data prior to screening under Rule 11-18.

Carol recommended that POTWs update their flow characteristics now, in advance of the screening process. This can be done in conjunction with the annual renewal notice associated with the billing from BAAQMD. POTWs should contact their permit engineer to make sure the data for their facility is correct. Some influent data is still very old and does not reflect advances in source control or changes in influent characteristics. Carol stated the toxicity weighting indicated that carbon tetrachloride, perchloroethylene, and chloroform were the primary compounds expected from liquid treatment processes at POTWs that pose a risk.

Randy Schmidt (CCCSD) presented a summary of Central San's experience performing a recent Health Risk Assessment (presentation attached). Prior to the modelling work required, there was extensive data verification of physical source characteristics, as well as emissions data. The first draft baseline HRA took approximately six (6) months at a cost of approximately \$100,000. Central San is currently doing QA/AC on the draft of the baseline HRA.

Meei-Lih Ahmad (SFPUC) discussed SFPUC's \$6.9 billion Capital Improvements Program and expressed concern regarding the timing of necessary program improvements and regulations. For example, the planning of the Southeast Plant started 4 years ago and the design is at 95% now. SFPUC endeavored to select appropriate technologies, but the construction is not expected to be complete until 2024. Changing regulations are challenging and potentially expensive to comply with if they did not exist at the start of the planning horizon.

3) Technology Implementation Loan Program

Derrick Tang (BAAQMD staff) from the Technology Implementation Office (TIO) provided information on low interest loans available for technologies that reduce greenhouse gas emissions. Low interest loans with extended terms and technical assistance with engineering evaluation are available to "MUSH" borrowers (municipalities, universities, schools, and hospitals). As part of the upcoming Global Climate Action Summit (taking place in San Francisco), BAAQMD will host a [Climate Tech Marketplace booth on September 13th](#) to connect technology providers with prospective customers.

4) AB 617 Implementation Update

David Joe (BAAQMD staff) presented an overview of AB 617 focused on the Community Air Protection Program and expedited TBARCT. West Oakland (developing an action plan) and Richmond (developing a monitoring plan) have been identified as active ("selected") communities and will develop their plans over the next year. CARB will approve selected communities statewide in October.

For BARCT Implementation within selected communities, AB 617 requires an expedited schedule be in place by January 1, 2019 and implementation be complete by December 31, 2023. The BARCT requirements do not apply to sources that have implemented BARCT since 2007. BAAQMD is focused on Cap-and-Trade facilities that have not updated control technology. There are 19 Cap-and-Trade facilities in BAAQMD and they are primarily petroleum refineries. Carol noted BAAQMD is looking to harmonize reporting requirements. BAAQMD planning (Virginia Lau and Phil Martin) is working directly with CARB on reporting, and is making changes to BAAQMD internal processes, so that all reporting can go through BAAQMD.

5) Standard Permit Conditions and Temporary Pilot Test Projects

Alfonso Borja (BAAQMD staff) presented a summary on temporary permits for pilot projects. Under current rules, the application process for a pilot project is the same as the process for a permanent installation, but the temporary permit is only valid for 3 months. Randy Schmidt noted that SCAQMD has a shortened process for temporary projects. Carol Allen suggested that the next time Rule 2-1 (General Requirements) is opened, this topic could be pursued, but current rules do not allow for an expedited process or longer time frame.

Leah Walker (Petaluma) summarized recent experiences where standardized permit conditions would have been helpful. Leah reviewed the public bidding process, and noted that public contracting law requires competitive bidding, which means the applicant does not know precisely what equipment will be selected until after the bid award. For a recent boiler project, when special permission to sole source equipment was obtained from the lawyers, it still took ten months to obtain an authority to construct (ATC) permit. Additionally, once the ATC was

issued, there was no provision to allow for releases of small amounts of digester gas during construction. During construction, it was necessary for a piping connection to be made taking approximately two hours to complete. Petaluma checked in with BAAQMD and determined it was acceptable to make the connection. Subsequently, the plant received a notice of violation and was also notified the two-hour release would need to be permitted. However, the length of time it would take to go through the permitting process would result in construction delays and cost overruns. Two key points from this experience: 1) There is a need to streamline the permitting process; and 2) public contracting rules must be considered – equipment is not specified at the time the permit application process begins. Brenda Cabral noted that BAAQMD is willing to evaluate up to three different engines during the permit process.

Following the official end of the meeting (after 2 pm), there was discussion of standard permit conditions for POTWs. Santa Rosa noted that they have a monitoring condition that is not based on a limited emission that needs to be changed. Brenda agreed and offered that the permit engineer make the change. Carol Allen suggested that “alternate operating scenarios” (such as construction and maintenance) be included in the permit discussion, rather than focusing solely on “typical operations.” Brenda stated staff is open to considering “construction only” conditions, as well as offered to consider updates to the permit handbook by BACWA members.

- 6) **Action Item:** POTWs need to update influent characteristics (influent concentrations and flow rates) as part of their annual update to BAAQMD.