



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

Quarterly Meeting
October 17, 2018

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Agenda

- **GHG Updates**
 - SB 1383: Statewide SLCP Reduction Strategy Implementation
 - BAAQMD's Basin-Wide Methane Strategy
 - Global Climate Action Summit Summary
- **AB 617: Community Air Protection Program**
- **Air District Updates:**
 - Portable Equipment Registration Program
 - Rule 11-18 (Reduction of Risk from Toxics at Existing Facilities)
 - Emissions Inventory Subgroup
 - Flare Rules (SCAQMD Proposed Flare Rule 1118.1)
 - Permit Handbook Revisions
 - Strategy for Future Interaction w/ BAAQMD on Key Issues



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GHG UPDATES

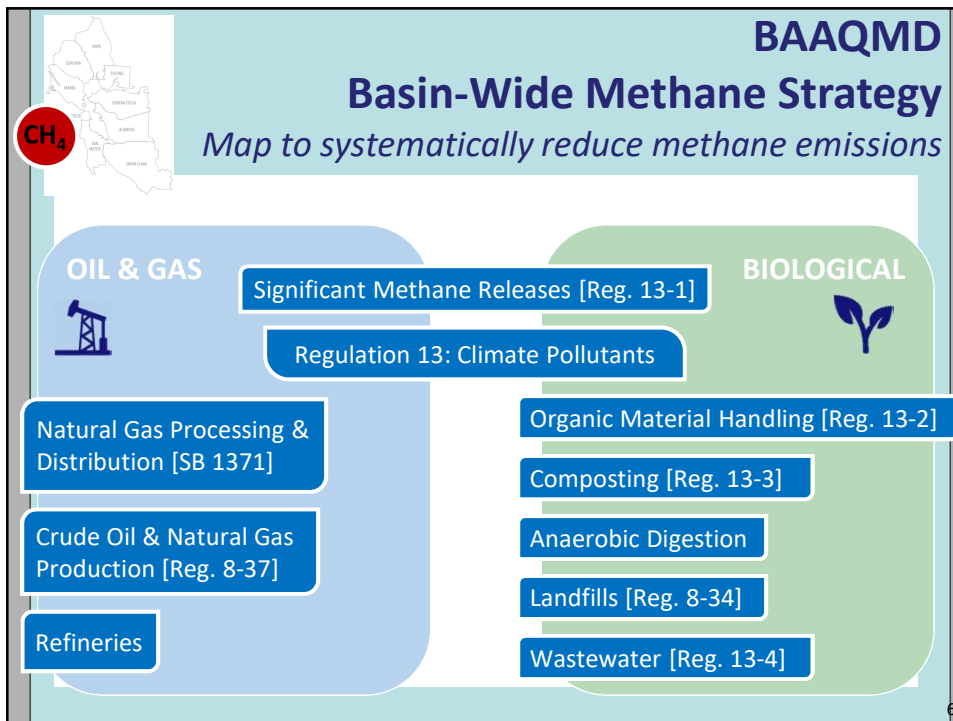
Organic Waste Diversion - SB 1383: SLCP Reduction Strategy Implementation

- 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 Production/Use of Biogas
 - CPUC to consider policies in support of in-State biogas production/use



Issues to be addressed in new formal regulation (expected by December)

- Adoption 2019 – Effective 2022 – Enforceable 2024
- Formal regulation is expected to address...
 - Limits on local ordinances
 - Biosolids only being anaerobically digested and/or composted to qualify as landfill reduction
 - Language construed as disallowing other treatment technologies and management other than land application
 - Need for jurisdictions and POTWs to negotiate whether biosolids can continue to be landfilled
 - Procurement of compost and biogas (RNG)
- Economic Analysis to be released soon!






BAAQMD

Basin-Wide Methane Strategy Workshop Schedule

<p>* Thursday, November 1, 2018 2:00 p.m. – 4:00 p.m.</p>	<p>Bay Area Metro Center 375 Beale Street San Francisco, CA 94105</p>
<p>Monday, November 5, 2018 6:00 p.m. – 8:00 p.m.</p>	<p>Martinez City Council Chambers 525 Henrietta Street Martinez, CA 94553</p>
<p>Wednesday, November 7, 2018 6:00 p.m. – 8:00 p.m.</p>	<p>Shannon Community Center 11600 Shannon Avenue Dublin, CA 94568</p>
<p>Thursday, November 8, 2018 6:00 p.m. – 8:00 p.m.</p>	<p>Berryessa Branch Public Library 3355 Noble Avenue San Jose, CA 95132</p>

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Draft Regulation 13, Rule 1 General Concepts


13-1: Significant Methane Releases

PURPOSE *to compel facilities to mitigate major releases rapidly; will act as **backstop** while source-specific rules are adopted*

CONCEPT *Prohibits ongoing significant methane releases*


SCHEDULE	WORKSHOPS Early Fall 2018	TO BOARD End 2018/Early 2019
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Submit comments by: November 13th



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Draft Regulation 13, Rule 1 Regulation Review

STANDARDS

Methane releases shall be abated if

EMISSIONS
> 10,000 PPM

FIX TIMES

Releases


MINIMIZE RELEASE
WITHIN 3 DAYS

ABATE RELEASE TO 500 PPM
WITHIN 14 DAYS


Recurrent releases

MINIMIZE RELEASE
WITHIN 3 DAYS

ABATE RELEASE TO 500 PPM
WITHIN 7 DAYS


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Draft Regulation 13, Rule 1 Regulation Review (cont'd)

LIMITED EXEMPTIONS

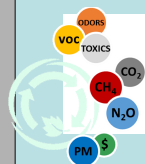
- **All sources:** if methane emissions <10 lb/day for each of 5 consecutive days
- **Refinery flares:** if each flare achieves 96.5% combustion efficiency (or 98% destruction efficiency)
- **Maintenance or repairs:** if methane release is abated to <500 ppm within 3 days AND emissions <100 lb/day
- **Landfill working face:** if methane release is abated to <500 ppm within 3 days AND emissions <100 lb/day


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Draft Regulation 13, Rule 1 *General Questions/Comments*

- Is the limited exemption for maintenance or repairs achievable during digester cleaning?
- Is the “methane concentration measurement” approach reasonable to do within six months of adopting this rule?
- Is the “determination of mass emissions” approach reasonable?



Draft Regulation 13, Rule 2 *General Concepts*

13-2: Organic Material Handling

PURPOSE *to limit methane and VOC emissions from the transfer and storage of organic material at all facilities*

CONCEPT

- Recordkeeping and Reporting
- Registration and Permitting
- Best Management Practices

SCHEDULE

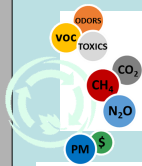
WORKSHOPS

Fall 2018

TO BOARD

2019





Draft Regulation 13, Rule 3 *General Concepts*

13-3: Composting Operations

PURPOSE *to limit methane and VOC emissions from processes typically part of composting operations*

CONCEPT

- Best Management Practices
- Mitigation Measures
- Control Requirements

SCHEDULE

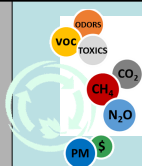
WORKSHOPS

Fall 2018

TO BOARD

2019

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Draft Regulation 13, Rule 4 *General Concepts*

13-4: Wastewater Treatment Operations

PURPOSE *is to limit methane emissions from processes typically part of waste water treatment operations*

SCHEDULE = ??

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Basin-Wide Methane Strategy *Summary of Regulatory Efforts*

- 2018/2019
 - Regulation 13, Rule 1 (Rule 13-1): Significant Methane Releases
 - Organic Material Handling & Composting Operations Rules (including anaerobic digestion) – Rules 13-2 & 13-3
- 2019/2020
 - Wastewater Treatment Operations – Rule 13-4

Short-term need:

Comment on draft Rule 13-1 & edit standard permit conditions

Long-term need:

Draft Best Management Practices for digester gas venting
Edit Permit Handbook

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Global Climate Action Summit & BAAQMD Technology Implementation 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) brought together technologies from around the world to meet with facilities in the Bay Area



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AB 617: COMMUNITY AIR PROTECTION PROGRAM



AB 617: Community Air Protection Program

- CARB to harmonize community air monitoring, reporting, & local emissions reduction programs.
- By October 1, 2018, CARB must set direction:
 - Assessing community exposure
 - Establishing criteria for air monitoring
 - Identifying source contributions and strategies for emissions reduction
- By April 2019, establish data exchange standards
- By October 2019:
 - Establish emission reduction targets, schedule, & enforcement programs
 - Air Districts to submit annual progress reports



AB 617: Proposed Regulation Criteria Air Pollutant & Toxic Air Contaminant Reporting

- CASA Submitted Comments August 23rd!
 - Support Air Districts submitting data on behalf of agencies unless agency chooses otherwise & to allow for data updates
 - Encourage CARB to coordinate w/ Air Districts & regulated agencies to develop the uniform electronic reporting system
 - Recommend definitions to be consistent with H&S code or local air districts where relevant
 - Cessation of reporting upon shut down of a facility
- NEXT STEPS
 - BAAQMD's Expedited BARCT Schedule
 - October 2018 – Release of staff documents and final proposed regulation (45-day comment period)
 - December 2018 – Board Date



BAAQMD's Expedited BARCT Implementation Schedule for AB 617

Figure 1: Expedited BARCT Implementation Schedule

Project	2018	2019	2020	2021
Organic Liquid Storage Tanks				
Petroleum Wastewater Treating				
Portland Cement Manufacturing				
Refinery Fluid Catalytic Crackers and CO Boilers				
Refinery Heavy Liquids Leaks				
Internal Combustion (Reciprocating) Engines				
Fiberglass Manufacturing				
Municipal Solid Waste Landfills				
Petroleum Coke Calcining				



AIR DISTRICT UPDATES



Portable Engine Registration Program

- Amendments signed & effective November 30, 2018
- PERP permits honored by all CA Air Districts.
- Operators of permitted portable sources are subject to notification requirements to the host Air District, upon relocation to the Air District's jurisdiction.
- Applicable to equipment used in more than one air district.



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



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

- Status Update:
 - 11-18 Implementation Working Group meeting quarterly
 - Technical Dispute Resolution Committee members tentatively identified (active and retired regulators from other Air Districts)
- Next Actions:
 - Update emissions inventory values (Subgroup Update!)
 - Verify emission calculations methodology with permit engineer & update concentration data as appropriate
 - Monitor progress of Phase 1 via Working Group
 - Track AB 617 regulation development (expedited BARCT implementation schedule)



Proposed Non-Refinery Flare Rule

- SCAQMD
 - Rule 1118.1: Control emissions from non-refinery (biogas) flares
 - Proposed amendments:
 - Reduce NOx and VOCs & minimize routine flare use
 - Maximize use of biogas (i.e., 85-98%!)
 - Includes thermal oxidizers & phasing out old flares with BACT standard non-refinery flares
- Following SCAQMD process...**
- SJVAPCD
 - Flare Rule 4311: Limit emissions of volatile organic compounds (VOC), NOx, and sulfur oxides (SOx) from operation of flares
 - BAAQMD (New Rule by 2020)
 - Reduce NOx & require biogas/non-refinery flares meet lowest available emissions reduction (LAER) level



Proposed Non-Refinery Flare Rule

New Flare

↓

Meet Emission Limits

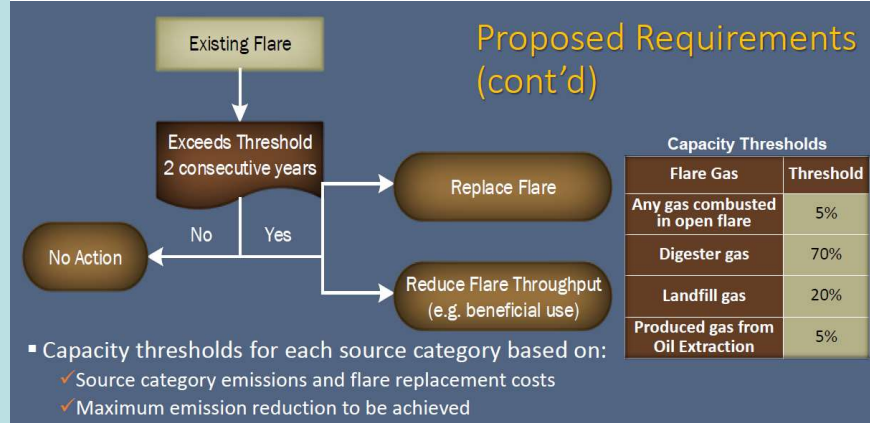
Flare Gas	NOx	CO	VOC
	Pounds/MMBtu		
Digester gas	0.025	0.06	0.038
Landfill gas	0.025	0.06	0.038
Produced gas from Oil Extraction	0.018	0.06	0.038
Other flare gas	ppmv 3% O ₂		DE*
	30	10	99%

*DE = Destruction Efficiency
0.018 pounds/MMBtu ~ 15 ppm

Comment	Response
<ul style="list-style-type: none"> ▪ Allow installation of new higher emitting flares (0.06 lb/MMBtu) at minor source wastewater treatment plant 	<ul style="list-style-type: none"> ▪ Consideration to allow higher limit for minor source digester gas flares with a capacity threshold



Proposed Non-Refinery Flare Rule



Targeting adoption by December 2018 –
Source tests begin within 12 months &
every 5 years going forward



Permit Handbook Revisions

- Need volunteers to review and revise:
 - Permit Handbook!
 - Standard Permit Conditions
 - Waste Handling (food waste)
 - Digester
 - Cogeneration
- Timeline unspecified



Strategy for Future Interaction w/ BAAQMD on Key Issues

- Key BAAQMD staff:
 - EO (Jack Broadbent)
 - Deputy EO's (Damian Breen & Greg Nudd)
 - TIO: Lucian Go, Brian Butler
 - Permitting: Brenda Cabral (Simrun, Alfonso, Flora)
 - Climate Strategy: Idania Zamora, Chad White
- Communication Coordination
 - BACWA Member share/exchange prior to responding to BAAQMD?
 - Target consistent responses from members
 - Unified voice
 - Controlled communications with council/board members



MEMBER UPDATES!



THANK YOU!

