

Key Elements to POTW Permit Conditions

BAY AREA Air Quality

MANAGEMENT

DISTRICT

Bay Area Clean Water Agencies Air Committee September 9, 2019

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OVERVIEW

- Purpose of POTW Permit Conditions
- SB 1383
- Typical POTW Source Categories
- Key Elements of a Permit Condition
- General Operational Parameters
- Emission Standards
- Monitoring
- Source Testing
- Recordkeeping
- Questions and Answers



PURPOSE OF POTW PERMIT CONDITIONS

- Allow the District to ensure that sources comply with District, state, and federal regulations
- Permit conditions must be enforceable
- Must allow measurement of emitted toxic and criteria pollutants
- Permit conditions help to ensure that equipment is operating as designed



SB 1383 – SHORT-LIVED CLIMATE POLLUTANTS (SLCP): ORGANIC WASTE METHANE EMISSIONS REDUCTIONS

- Signed in 2016 to reduce SLCP in California
- Compared to 2014, 50% reduction in organic waste by 2020 and 75% reduction by 2025
- CalRecycle is given regulatory authority for SB 1383
- Now, CA recycles 10 million tons organic waste
- To reach goal, need to recycle 20 million tons



TYPICAL POTW SOURCE CATEGORIES

- Wastewater Treatment Operations
- Anaerobic Digesters & Flares
- Engines/Microturbines
- Boilers



KEY ELEMENTS OF A PERMIT CONDITION

- 1. General Operational Parameters
- 2. Emission Standards
- 3. Monitoring
- 4. Source Testing
- 5. Recordkeeping



GENERAL OPERATIONAL PARAMETERS

- Throughput Limit
 - Wastewater Effluent, Natural Gas/Digester Gas, Digester Gas Production
- Operational Parameters
 - Maintenance of Abatement Devices
 - Abatement of odors at all times



EMISSION STANDARDS

- Volumetric Concentration
- Emission Factors
 - Source Test Results
 - Manufacturer's Specifications
 - Criteria Pollutants
 - Toxics (H₂S, etc)



MONITORING

- Installation and Operation of Pressure Sensors
- Flow Meter
- Criteria Pollutant Content
- Toxics Content (H₂S)
- Temperature (flare, engine exhaust)



SOURCE TESTING

- Perform Source Test within 60 days of startup
- Submit Source Test Protocol at least 7 days prior to testing to the Source Test Division
- Submit Results within 60 days of Testing
- Source Tests Performed using District-Approved Testing Methods
- District-Approved Testing Configuration



RECORDKEEPING

- Handheld Monitoring Logs
- Startups and Shutdowns
- Throughput
- Over-Pressurization
- Maintain Records for District Requests



QUESTIONS AND ANSWERS

Thank you

Questions/Comments?