



AIR ISSUES & REGULATIONS COMMITTEE

A Committee of the Bay Area Clean Water Agencies

**BACWA Annual
Members Meeting
February 19, 2021**

Air Issues & Regulations

- Methane Reduction
 - BAAQMD Proposed Regulation 13: Climate Pollutants
 - SB 1383: Organic Waste Diversion/Methane Reduction Regulations
- Air Toxics Reporting/Reduction
 - CARB AB 617 Reporting / AB 2588 Compound List Updates
 - Rule 11-18: Air Toxic Emissions at Existing Facilities
- BACT Determination for Large Diesel Back-Up Generators
- BACWA-BAAQMD Quarterly Meeting Kick-Off



METHANE REDUCTION



BAAQMD Regulation 13: Climate Pollutants

**Rule Development
Suspended due to
COVID-19 & Lack of Data**

Rule	Next Workshop	Board Workshop	Notes
13-1: Significant Methane Releases	TBD	TBD	Tabled indefinitely to focus on source-specific rules.
13-2: Organic Waste Handling	TBD	TBD	Draft is focused on organic material handling: Material Recovery Facilities, Transfer Facilities, Chip & Grind Facilities.
13-3: Composting Operations	TBD	TBD	Draft language in development, not released.
13-4: Sewage Treatment & Anaerobic Digestion	TBD	TBD	BACWA providing input on draft language. Draft rule to consider biogas produced/collected, minimizing other pollutants, flare requirements, record keeping, reporting requirements, etc. Working with BAAQMD to collect information on BMPs to inform rule development and scoping a non-competitive proposal
13-5: Hydrogen Plants	TBD	TBD	Focus on hydrogen production at petroleum refineries.
8-34: Solid Waste Disposal (Landfills)	TBD	TBD	Focus on methane from landfills – BAAQMD to align with state and federal requirements.

BAAQMD Regulation 13: Climate Pollutants



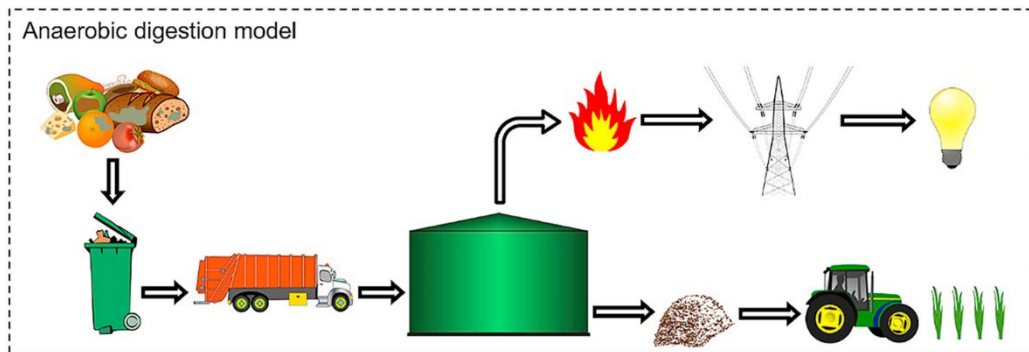
- Early involvement, BAAQMD sought input from BACWA
- Participants on Organic Recovery Technical Working Group
- BACWA is...
 - Working to summarize existing Best Management Practices already in place that control methane and VOC emissions, to determine if there is a need for further reduction
 - Supporting BAAQMD in reviewing and revising the scope of the non-competitive proposal to identify methane and VOC emissions mitigation options



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SB 1383 Regulations: Organics Diversion & SLCP Reduction

- Targets 40% methane reduction by 2030
- Organic waste diversion from landfills – 50% by 2020 and 75% by 2025
- Incentivizes biogas production
- **Issues:** BAAQMD regulations do not consider overall methane reduction (i.e., at landfills) and act to limit increases in biogas production
- **Asks to BAAQMD:** Consider CARB/CalRecycle/SWRCB's scope for total methane reduction in Rule 13-4 development and support increased biogas production/utilization



AIR TOXICS REPORTING/ REDUCTION



Air Toxics: AB 617 / AB 2588 Program Updates

- Criteria Air Pollutant and Toxic Air Contaminant Reporting (CTR)

Requires WWTPs to report full Hot Spots compound list (>500 compounds).

- Implements statewide annual reporting of criteria air pollutant and toxic air contaminant emissions data from facilities. It establishes new policies to improve emissions inventory data (critical to understanding sources of emissions contributing to adverse health risks or other impacts at the local, regional, and statewide level).

- AB 2588: Air Toxics "Hot Spots" Program (Hot Spots Program)

Expands Hot Spots compound list by >10,000 compounds (including functional groups of compounds).

- Establishes a statewide program for the inventory of air toxics emissions from individual facilities, as well as requirements for risk assessment and public notification of potential health risks.

ISSUE: As written, CTR may require Wastewater Sector to test for and report ALL (>10,000) compounds listed under the Hot Spots Program!



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Air Toxics: AB 617 / AB 2588 Program Updates

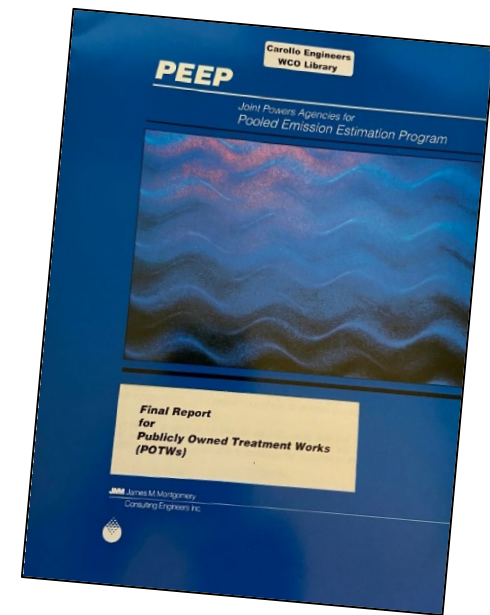
- BACWA members have been working with CARB on approach for determining a shortlist of relevant toxics to report
 - CARB confirmed WWTPs can report as they were (BAU) through 2028
 - due to absence of sampling/quantification methods and toxicity information for most existing and proposed compounds
 - CARB confirmed wastewater sector has until 2028 to perform a “two-step process” (collaborating with CARB and air districts) to determine shortlist of compounds to quantify/report in 2029 forward. Steps are:
 1. GC/MS Scan for determining sector-specific compound list
 2. Quantification Process (once quantification methods have been approved by CAPCOA and Scientific Review Panel) - mimics 1990 Pooled Emissions Estimation Program (PEEP)



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Air Toxics: 1990 Pooled Emissions Estimation Program (PEEP)

- Provided participating agencies a standard estimation methodology for determining air toxics emissions from their respective facilities.
 - 25 POTWs across CA formed a JPA
 - 18 unit processes (liquid, solid, gas)
 - 20 sites (managed as north and south)
 - 3 rounds of sampling over 5 months
 - Project duration: ~2 years (1989-1990)
 - Budget: \$2.5M (1990)
- Result: Emission factors for a short-list of targeted compounds determined by participating agencies and air district staff



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

- Phased implementation based on cancer prioritization – WWTPs in Phase 2 (starting early 2021)
- **Issues:**
 - Emission factors are based on old influent data and can result in erroneously high Prioritization Scores
 - Timing of Rule 11-18 risk reduction implementation conflicts with timing of CARB-approved two-step process for updating emission factors
- **Asks:** Coordinate risk reduction plan development with statewide two-step process (to be complete in 2028) to give time to:
 - Update relevant TAC emission factors
 - Determine needed and cost-effective risk reduction measures (considering rate payer impacts)



BACT Determination for Large Diesel Back-Up Generators

- Issued December 22, 2020 and applies to:
 - Diesel backup engines ≥ 1000 bhp
 - Applications deemed complete after January 1, 2020 (retroactive!)
- If Authority to Construct already issued, BACT2 does not apply (even if Permit to Operate has not been issued)

EPA Tier 4 emission standards

Pollutant	BACT2 Limit
POC	0.14 g/bhp-hr
NO _x	0.5 g/bhp-hr
SO ₂	CARB Diesel Fuel (15 ppm sulfur)
CO	2.6 g/bhp-hr
PM-10	0.02 g/bhp-hr

BACWA AIR Committee and members are writing letters to share impacts of the retroactive application to current projects



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BAAQMD-BACWA Leadership

- Partners

- Regulatory development
- Innovative technology support
- Funding support



- Mimic BACWA-RWQCB

- BACWA ED, 2 Board Members, AIR Committee Chairs
- BAAQMD Deputy Executive Officers, Rule Development Manager
- Meet regularly (3-4 times per year)
- 1-2 topics per meeting
- First meeting: December 7th, 2020
- Next meeting: March TBD, 2021



Thank you!

Upcoming Meetings:

March 31st

BACWA AIR Committee, 10 am – Noon

CASA Air Quality, Climate Change & Energy (ACE) Workgroup
February 25th, 8:30 – 10:30 am (Conference Call/Webinar)

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