



## BAAQMD-BACWA Meeting – New BACT Determination Meeting Agenda

<b>Date:</b>	March 5, 2021
<b>Time:</b>	3:00 – 4:00 pm
<b>BAAQMD:</b>	Damian Breen and Pamela Leong (BAAQMD)
<b>BACWA:</b>	Lorien Fono (BACWA ED), Mary Cousins (BACWA Regulatory Program Manager), Amit Mutsuddy (BACWA Chair, City of San Jose), Lori Schectel (BACWA EB, Central San), Rita Cheng (Central San), Azalea Mitch (City of San Mateo), Sarah Scheidt (City of San Mateo), Sarah Deslauriers and Courtney Mizutani (supporting consultants to BACWA AIR Committee)
<b>Virtual Mtg Link:</b>	Access Link in Meeting Invite
<b>Call-in:</b>	Included in Meeting Invite

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- 1) Introductions
- 2) Summary of BACWA Concerns and Asks Regarding the New BACT Determination
  - a) Regulatory Process – The regulations and guidance "in force" did not include the new BACT determination at the time member applications were deemed complete in 2020 (i.e., prior to December 22, 2020 and with no notification prior to that date as the determination was being discussed by staff). Backdating the application of a new BACT is unprecedented and essential public services need to understand how to interpret Rules and the use of the BACT/TBACT Workbook for future planning purposes and responsible use of public funds. Applicants rely on the published BACT determinations (in some cases) years in advance of submitting a formal application to BAAQMD.

Example member impacts:

    - i) Central San
    - ii) City of San Mateo

BACWA Ask: Explain the Air District's application of Rules 2-2-301, 2-2-414, and 2-1-409.
  - b) Essential public services, including POTWs, rely on proof of operational reliability in a prolonged emergency event when considering implementation of technologies. While Tier 4 engines are in use as a redundant power source, data have not been collected for Tier 4 engines used as the single emergency back-up power source to deem them "achieved-in-practice." Additionally, recent extreme events revealed weaknesses and failure modes in these engines used as such.

BACWA Asks:

    - i) Collect and provide operational proof that the BACT determination for diesel back-up engines greater than or equal to 1,000 bhp ensures operational reliability of Tier 4 engines as the single emergency back-up power source during an actual prolonged emergency.
    - ii) Work with other air districts, including SCAQMD, to develop an achievable and reliable BACT standard for essential public services.
    - iii) Exempt essential public services from implementing the BACT determination until sufficient proof is collected for use of Tier 4 engines as the single emergency back-up power source.
- 3) Next Steps
- 4) Adjourn