

BACWA Executive Board Update



**BAY AREA
BIOSOLIDS
COALITION**



July 16, 2021

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// Biosolids and Air Issues being addressed and timelines

Biosolids Management	Description of Issue to Address	Action
Biosolids White Paper	Collaboration with SFEI, Ducks Unlimited, Sonoma Land Trust, and Regional Water Board to draft a white paper on biosolids land application in the Baylands	Drafting sections this week, Need subgroup review

Air Issue or Regulation	Description of Issue to Address	Action
H ₂ S/Odor Emissions	Chlorine shortage leading to Ferric Chloride shortage, which will lead to H ₂ S/Odor emissions without an alternative	Inform BAAQMD, Coordinate members
Air Toxics	How do you respond to BAAQMD when staff ask members to estimate emissions for compounds we do not have approved methods for analysis and are unable to monitor?	Refer to CASA Summary Sheet, notify BACWA/CASA
Electrification vs Renewable Natural Gas (RNG)	Concepts for the development of clean energy and advanced clean vehicle regs have not included biogas/RNG as part of programs to reduce GHG emissions	CASA Subgroup meeting 7/19, CARB Board Member Outreach

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// Biosolids White Paper Land Application: Land Application of Biosolids in Baylands

- Sponsored by Sonoma Land Trust and to be posted by SF Bay Joint Venture
- Lead author: SFEI (support from Ducks Unlimited)
- BABC/BACWA invited to draft sections and review/edit entire document
- Regional Water Board to be integrated in review
- Structure similar to [San Pablo Baylands: Ensuring a Resilient Shoreline](#)
- Targeting ~20 pages by October 2021
- Outline has been revised with no objection to our edits
- Next Steps
 - Drafting sections this and next week with input from Greg Kester
 - Review by subgroup prior to stakeholder meeting (~Aug 15th)

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// Biosolids White Paper Sections (Leads): Land Application of Biosolids in Baylands

1. Introduction & Purpose (DU)
2. The Baylands Fringing San Francisco Bay (SFEI)
3. Biosolids (BABC/BACWA)
4. Current Regulation of Biosolids and Wetlands (BABC/BACWA & DU, respectively)
5. Why Baylands have Received Biosolids Historically (BABC/BACWA) Combine 5 & 6?
6. Biosolids in the Baylands
7. Future Compatibility of Biosolids Use in Baylands for Restoration and Conservation (DU)
8. Holistic Assessment of Biosolids Land Application in the Baylands (SFEI)
9. Are there Opportunities to Manage Baylands Restoration and Beneficial Use of Biosolids Projects Together? (BABC/BACWA & SFEI) Combine 7 & 9?
10. Recommendations

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// Odor Emissions : Chlorine shortage impacting Ferric Chloride supply

- Ferric Chloride supplier notified member they are unable to supply their next shipment
 - Chlorine shortage
 - Prioritizing water treatment
 - Uncertain timeline, but manufacturing appears to be resuming (after recovering from fire impact)
- Some members have short supply on hand and likely to emit odors without an alternative
- Reaching out to BAAQMD Permit Staff and informing BAAQMD Leadership for our next meeting discussion

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// Air Toxics: How do WWTPs comply with the new reporting requirements?

- WWTPs to report business as usual through 2028
 - Most new compounds do not have approved sampling or laboratory methods
 - Two-step process will serve as “best available data and methods”
- Perform “two-step process” to determine relevant compounds to quantify and report:
 1. Scanning air space of unit processes for determining detectable compounds
 2. Quantification Process (Mimic 1990 Pooled Emissions Estimation Program)
 - Quantification methods approved by CAPCOA
 - Toxicity potentials approved OEHHA Scientific Review Panel

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// Air Toxics: How do WWTPs comply with the new reporting requirements?

- Next steps:
 - Refer CASA Summary Sheet to educate WWTP staff and air district staff
 - Notify CASA/BACWA if Air District requests estimates of new compounds
 - CASA to draft proposal for performing the Two-Step Process with members over the next 6 months
 - Executing the Two-Step Process requires various steps (over next 5 years)

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Understanding New Requirements for Air Toxics Reporting

California air districts are beginning to adapt recent amendments to the California Air Resources Board's (CARB) Air Toxics "Hot Spots" Program Emission Inventory Criteria and Guidelines (EICG) and the Reporting of Criteria Air Pollutants and Toxic Air Contaminants Regulation (CTR). This fact sheet is to inform your organization of those regulatory updates, how they apply to the wastewater sector, and for your reference in discussions with air district staff.

REGULATORY UPDATES: As part of improving air toxic emissions reporting, the public's access to the data, and reduction strategies for priority communities, the updates to the EICG and CTR:

- Expand the number of compounds to be validated for monitoring and reporting from a total of "500 to over 1,000 for permitted waste facilities, including wastewater treatment plants (WWTPs).
- Establish criteria for air monitoring AND an approach for the waste sector (i.e., the "two-step" process) to identify a short list of toxics relevant to WWTPs.
- Identify strategies/timelines for emissions reductions (prioritizing overburdened communities).

Since most of the 1,000+ compounds do not have approved sampling or laboratory methods and have not been assessed by the Office of Environmental Health Hazard Assessment, health risks associated with these compounds cannot be quantified. In turn, any prematurely reported information will yield erroneous emission estimates, causing confusion and potentially unwarranted alarm for our neighbors.

WASTEWATER SECTOR IMPACTS & RESPONSE: CARB approved a phased compliance approach that allows permitted WWTPs to report toxics in usual through 2028 while the sector executes the two-step process to:

1. Perform a scan of air samples across various treatment plant unit processes to determine detectable compounds (of the 1,000+ compounds).
2. Quantify the emissions of detectable toxic compounds based on an approved sampling and analysis approach (working with air districts and CARB).

The two-step process will take approximately five (5) years and about \$10 million for the wastewater sector to complete. In the meantime, the wastewater sector is unable to quantify any new air toxic compounds until the completion of the statewide two-step process and must rely upon the results of the two-step process as the "best available data and methods." In other words, no new air toxics need to be reported until 2029.

This summer CASA will work with the membership to establish an oversight and cost-recovery structure for the two-step process. Thereafter, about 20 WWTPs will need to sample emitting unit processes in accordance with approved protocols.¹ A tentative schedule of the two-step process is provided below:

For more information or if you have questions, please contact Sarah Deslauniers at sdeslauniers@carollo.com or David Rothbart at drotbart@carollo.com. Updates are provided as part of CASA's Air Quality, Climate Change, & Energy Workgroup monthly meetings and an Air Toxics Subgroup has been established that meets as needed.

¹ Scanning and sampling protocols will be developed in collaboration with and approved by local air districts and CARB staff. CASA will lead the coordination and development of the protocols.

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// Electrification vs Renewable Natural Gas (RNG)

- SB 100: Renewable and zero-carbon resources to supply 100% of electric retail sales by 2045
 - State agencies have not included RNG as part of their programs and not responsive to our comments
- Developing Advanced Clean Vehicle regulations target zero-emission vehicles by 2045 with government entities viewed as early adopters
 - CARB has not included near-zero emission vehicles (fueled by RNG) as part of programs in the concepts presented
- Next Steps
 - CASA Subgroup meeting Monday, July 19th, to develop key asks for CARB Board Member outreach to influence draft regulation
 - Comment on draft regulations in fall '21 and again in the winter/spring '22

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Thank you!