



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

Quarterly Meeting
March 20, 2024

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Agenda

- Introductions
- Update on BAAQMD Requests or Issues
- Summary of BACWA-BAAQMD Implementation Workgroup Meeting held Feb 28th
- New BACT and/or TBACT Determinations
- Rule 11-18 Amendments
- CARB Statewide Air Toxics Pooled Emissions Study
- CARB Advanced Clean Fleet Regulations Implementation Timeline/Requirements
- 2024 State Legislation Update
- Proposed Regulation 13
- Informational Items
- Open Discussion/Member Updates
- Adjourn



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Update on BAAQMD Requests or Issues

- SVCW (Arvind Akela)
 - POC and NPOC limits
- FSSD (Meg Herston)
 - Monitoring of fittings as required at refineries



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BACWA-BAAQMD Implementation Workgroup Meeting Summary held February 28th

- Overview of Decisions and Action Items
- Update on Status of Report to BAAQMD Board
- Summary of Source Test Workshop and Next Steps
- Following the Established Process for Policy Decisions
- BAAQMD Update on Future BACT Determination Process and Guidebook Updates
- Update from BAAQMD on Strategic Planning Initiative
- BAAQMD Update on Standard Permit Conditions
- BAAQMD Update on Rule 11-18 Amendments
- Coordinate Two Step Process – ongoing with BAAQMD, other Air Districts, and CAPCOA



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BACWA-BAAQMD Management Meeting

- Introductions
 - APCO Dr. Philip Fine
 - New Deputy Executive Officer Meredith Bauer – Engineering and Compliance
 - New Deputy Executive Officer Viet Tran – Public Affairs
- BACWA/POTW Community Mission and Vision
- Dr. Fine's Vision and Priorities
- Desire to collaborate and debrief on Workgroup Accomplishments
 - Early engagement on Rulemaking
 - Reporting to BAAQMD Board
- Discussion of how BAAQMD staffing limitations impact POTWs' ability to complete beneficial projects
- Invitation to BACWA Annual Meeting

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BAAQMD BACT / TBACT Updates

Tier 4 engines > 50 hp

Achieved in Practice in Sac Metro APCD and San Joaquin APCD

BAAQMD Schedule



RACT for digester gas flares

- CO RACT lowered from 0.2 lb/MMBtu to 0.1 lb/MMBtu.



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

- Originally adopted in 2017 to address significant risk from existing facilities
- Concept Paper & Proposed Amendments
 - Annual update of facilities list based on prioritization score
 - Possibility of facilities conducting own HRAs for BAAQMD review
 - BACWA Comment Letter (2/29/2024)
- Proposed updates to Implementation Procedures (IP) under current rule
- Subsequent proposed updates to IP under proposed amended rule
- Anticipate draft language late summer/fall 2024



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CARB Statewide Air Toxics Pooled Emissions Study: Criteria Pollutants & Air Toxics Reporting

- AB 617 and AB 2588 were updated to “harmonize” air monitoring, reporting, & emission reductions from stationary sources in CA for a long list of compounds
- **POTWs must participate in a two-step process (individually or as a group) to determine a shortlist of compounds to be monitored and reported**
 1. Scan air space of unit processes to determine detectable compounds
 2. Perform sampling and analysis to ultimately quantify emissions of detectable compounds (Mimic 1990 Pooled Emissions Estimation Program, PEEP, but broader in scope)
- Report business-as-usual through 2028 while performing two-step process (reporting begins in 2029 for 2028 data)



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CARB Statewide Air Toxics Pooled Emissions Study: Criteria Pollutants & Air Toxics Reporting

- BACWA distributed a request from CASA to participate in the Statewide Air Toxics Pooled Emissions Study, which comes with benefits to the wastewater sector:
 - Representative POTW Source Testing Cost Savings
 - Administrative Cost Savings
 - Streamlined Project Management and Execution
 - Coordinated Statewide Action
 - Single Reference for Emission Factors for Future Use

- Who should participate or who does this apply to?
 - ≥5 MGD average annual daily flow, uncovered primaries
 - ≥10 MGD average annual daily flow, covered primaries



CARB Statewide Air Toxics Pooled Emissions Study : Participation and Contribution Request

FY 2024: Pay July 1, 2024*	FY 2025: Pay July 1, 2024	FY 2026: Pay July 1, 2025	FY 2027: Pay July 1, 2026
\$200 per MGD	\$1,000 per MGD	TBD, budget ~\$1,250 per MGD	TBD, budget ~\$1,250 per MGD

*BACWA is fronting costs for its members for FY 2024 to allow time for budgeting.

Updates & Next Steps

- CASA Steering Committee hired a Project Manager, working to refine scope/contract
- CASA distributed a summary of the Statewide Pooled Emissions Study and a requested participation, BACWA shared it with members
- Ongoing updates will be provided and opportunities for you to provide input via CASA's Air Toxics Subgroup – next meeting: April 10th (which will be rescheduled to the following week to avoid CWEA Annual Conference)



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CARB Advanced Clean Fleet Regulations Implementation Timeline & Requirements

Applies to gross vehicle weight rating >8,500 lbs (medium- and heavy-duty)

State & Local Government Agency Fleets include cities, counties, special districts, state agencies

- **If NOT considered** a low population county, have >10 vehicles in fleet:
 - January 1, 2024, 50% of vehicle purchases in each calendar year must be ZEVs
 - January 1, 2027, 100% of vehicle purchases in each calendar year must be ZEVs
- **If considered** low population county or ≤10 vehicles in fleet:
 - January 1, 2027, 100% of vehicle purchases in each calendar year must be ZEVs.
- No requirement to end the use of existing compliant vehicles.
- Early ZEV purchases made before deadlines or in excess of requirement count toward future ZEV purchase requirements if ZEV is still active.
- Exemptions/extensions are available but confusing.
- CASA is available to support streamlining the application process.
- Please let us know if you are seeking an exemption or extension!



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CARB Advanced Clean Fleet Regulations Implementation Timeline & Requirements

High Priority & Federal Fleets Requirements

If you are a WWTP, you can opt your entire medium and heavy-duty fleet into this regulation:

- Timeline to transition entire medium- and heavy-duty fleet
- Allows biomethane fueled vehicles supporting SB 1383 facilities to opt into Milestone Group 3
- Does **NOT** provide for expansion of fleet trucks fueled by biomethane in support of SB 1383 beyond Jan 1st, 2024 (we have offered to demonstrate biogas-to-hydrogen technologies, but need a market for biomethane in the meantime, CARB's Resolution directed staff to work with us – the Chair to assign lead staff this year)

Percentage of vehicles that must be ZEVs →	10%	25%	50%	75%	100%
Milestone Group 1: Box trucks, vans, buses w/ two axles, yard tractors, light-duty package delivery vehicles	2025	2028	2031	2033	2035 & beyond
Milestone Group 2: Work trucks, day cab tractors, buses with three axles	2027	2030	2033	2036	2039 & beyond
Milestone Group 3: Sleeper cab tractors and specialty vehicles	2030	2033	2036	2039	2042 & beyond

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CARB Advanced Clean Fleet Regulations Implementation

- CARB's Truck Regulations Implementation Group (TRIG)
 - 4 Subgroups: Outreach, Border Communities, Infrastructure Implementation, Rule Provisions
 - Rule Provisions Subgroup to meet for second time March 21st, very little progress
- Separate from TRIG, CASA is collaborating with CARB's Chair (and state agencies) to maintain multiple uses of biogas to ensure successful implementation of SB 1383 – CARB to assign lead staff, CASA is now reaching out to Board Members/Executives since there has been little activity
- Integration of AB 1594 into ACF (allowing wastewater fleets to purchase ICE vehicles for those needed in response to major events, if ZEV equivalent not available)
 - To be facilitated by CARB's TRIG
 - TRIG Staff announced a workshop to be held March 25th
 - Let Sarah Deslauriers know if you plan to attend and comment

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2024 State Legislation Update



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Climate Pollutants - Regulation 13

- BAAQMD suspended rule development for Regulation 13
- Interested in nitrous oxides
- Rule Development tasked with developing a white paper
- N₂O emissions may become part of Regulation 13
- WRF activities



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Informational Items

- Cumulative Impacts
- Indirect Sources



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Open Discussion / Member Updates

- BAAQMD Grants
- **BACWA Annual Meeting:** May 3rd
 - Please register to attend (link in agenda)!
- **Next Quarterly Meeting:** May 29th



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Thank You – Happy Spring!



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