



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

**Quarterly Meeting**  
**February 25, 2026**

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## Agenda

- Introductions
- BACWA-Bay Area Air District (Air District) Implementation Workgroup
- Air District Staffing Changes
- Engineering Program Manager Pilot Program
- Air District Rule Development
- Air District Source Testing Update
- CARB Statewide Air Toxics Pooled Emissions Study
- CARB Advanced Clean Fleet Regulations Implementation Update
- 2026 State Legislative Update
- Open Discussion/Member Updates
- Adjourn (Next Meeting: May 20, 2026)



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## BACWA-Air District Implementation Workgroup Updates from January 26<sup>th</sup> Meeting

- Outlook on Engagement
  - Engineering Project Manager Position
  - Air District Source Testing
  - Strategic Plan and Resulting Rulemaking Priorities
  - Status of Edits to Standard Permit Conditions
  - SFPUC & Refinery Rules
  - Source Testing for Compliance Purposes
  - CASA Statewide Air Toxics Pooled Emissions Study Coordination
- Other Opportunities for Collaboration between BACWA and Air District



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## BACWA-Air District Implementation Workgroup Upcoming on April 20<sup>th</sup>

- Possible Topics
  - Update from Air District on Engineering Project Manager Pilot
  - Air District Source Testing
  - Update from Air District on Strategic Plan and Resulting Rulemaking Priorities
  - Update from Air District on Status of Rule 11-18 Amendments
  - BACWA feedback on Anaerobic Digester White Paper
  - Update from BACWA on the CASA Statewide Air Toxics Pooled Emissions Study Coordination
- Suggestions for other topics?



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## Air District Staffing Changes

- Source Test Changes – Marco Hernandez, Gloria Espena, Elaine Ko, Andrew Berg replacing Marco
- Permitting – Perry Ng transferred
- Risk Reduction – Ariana Husain
- Engineering Program Manager – Janet Whittick, plus one more in process
- BACT Manager / Consistency Coordinator – in process



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## Engineering Program Manager Pilot Program

- Three Year Pilot Program
- 6-month Beta Phase BACWA-Air District MOU
- Three Beta Phase facilities:
  1. Santa Rosa
  2. Sunnyvale
  3. SFPUC Southeast Treatment Plant
- Janet Whittick is EPM coordinator for BACWA agencies



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# Engineering Program Manager Pilot Program

## Engineering Program Manager: Pilot

### Engineering Program Managers would:

- Work with applicants with complex permit applications prior to submittal.
- Keep projects on a schedule.
- Coordinate timely exchange of information.
- Resolve roadblocks and elevate for management decision as needed.

### Funding and Pilot Phase

- The pilot program will run for three years, during which facilities will fund the assigned positions.
- After the pilot phase, the program may transition to a voluntary fee-based model in FY 2030.



### Key Benefits for Facilities

- Faster Permit Processing – Reduces delays and improves approval timelines.
- Pre-Application Guidance – Helps applicants prepare more complete applications.
- Dedicated Expertise – Engineering Program Managers provide specialized support.
- Greater Transparency – Facilities receive clear expectations and regular updates.
- Support for Emerging Technologies – Assistance to participating facilities in permitting new technologies such as renewable energy, carbon capture, and other innovative projects.

# Air District Rule Development

## Rule Development and Public Engagement



**Note:**  
**CBO:** Community-Based Organization  
**CSC:** Community Steering Committees

**CERP:** Community Emission Reduction Plans  
**NGO:** Non-Governmental Organization



## Air District Rule Development

- Permit Streamlining regulations (Regulation 2) to be "bumped up" as directed by Air District Board
- Permit Streamlining Task Force established and integrated with Air Board's Ad-Hoc Permit Streamlining Committee
  - Second Meeting held on 2/24/26
- Rule 11-18 Amendments – proposed rule package Spring 2026; no workshops; Board Presentation Q4 2026
- Anaerobic Digestion White Paper – draft for public comment Q1 2026
- Regulation 13 – To be scheduled



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## Permit Streamlining Task Force

- Air District recognized need for improvement
- Will work on "efficiency" first, then "stringency" later
- Monthly meetings with Industry/Community representatives
- Panelists v. participants (listening mode participation)
- Staff focus is implementing ideas put forth by the Task Force
  
- BACWA Strategic Plan and Rule Making Subcommittee
  - To provide feedback on ideas proposed in Task Force meetings
  - To discuss other topics raised in the Task Force meetings
  - Looking for interested member agencies!



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## Permit Condition Considerations

- Standard Permit Conditions
  - Developed subcommittee to review draft SPC (anaerobic digestion, cogen, and organic waste handling); Awaiting headworks
  - Draft SPC comments under review by Air District
- Refinery Rules
  - Facilities should carefully review draft engineering evaluations and permit condition before accepting final
  - Draft permit conditions reference non-POTW related rules



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## Air District Source Testing Update

- Required Source Testing and Reporting
  - BACWA requested better communication
  - “Revisions” to source test reports not allowed; Air District will accept “addendum” (EPA will not accept revised reports)
  - Air District wants to fix the process going forward
  - Any recent source testing experiences to share?
- Air District has begun quarterly Source Test workshops with Source testing companies
  - Next meeting – Collaborate on guidelines with Air District



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## CARB Statewide Air Toxics Pooled Emissions Study: Criteria Pollutants & Air Toxics Reporting (CTR)

- 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)
- **CA wastewater sector has opted to perform statewide pooled source testing – those not participating and not performing their own source testing are not in compliance**



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## Status of CARB Advanced Clean Vehicle Regulations

Adapted from graphic by Cummins with added detail



<b>Engine Manufacturers</b> Must sell engines that meet requirements	<b>CARB Omnibus Low NO<sub>x</sub>:</b> Sets emissions standards for new engines to meet, starting in 2024 for CA and opt-in states <b>President signed Res. 89 disapproving of EPA's waiver</b> <b>CARB postponed Nov 20<sup>th</sup> hearing amendments</b>	<b>EPA Heavy Duty Low NO<sub>x</sub>:</b> Sets emissions standards for new engines to meet, starting in 2027 nationally <b>EPA rescinded 2009 GHG Endangerment Finding February 18</b>
<b>Vehicle Manufacturers/ Dealers</b> Must sell an increasing % of ZEVs	<b>CARB Advanced Clean Trucks:</b> Must produce (and sell) a certain % of ZEVs each year beginning 2024 <b>President signed Res. 87 disapproving of EPA's waiver</b> <b>FTC says OEMs agree 2023 Clean Truck Partnership (CTP) is unenforceable with signed Resolutions</b> <b>CARB heard proposed amendments July 24<sup>th</sup></b> <b>CARB sued OEMs for violating 2023 CTP agreement</b>	<b>EPA Phase 3 Heavy Duty GHG Standards:</b> Must meet CO <sub>2</sub> average for all vehicles sold, starting in 2027 <b>EPA rescinded 2009 GHG Endangerment Finding February 18</b>
<b>Fleet Owners/ End Users</b> Must follow ACF ZEV purchase OR % requirements	<b>CARB Advanced Clean Fleets:</b> Must purchase ZEVs starting in 2024 OR meet ZEV milestone thresholds starting in 2025 <b>CARB withdrew waiver request, regulations related to private/drayage fleets repealed Sept 25<sup>th</sup></b> <b>CARB working on 15-day changes to be presented to Board in early 2026</b>	<b>CARB Clean Truck Check – Heavy Duty Inspection/ Maintenance:</b> Requires periodic emissions compliance tests <b>Proposed Partial SIP Disapproval (cannot get credit for emission reductions)</b>

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## CARB's AB 1594 amendments to ACF regulation



- Applies to **public agencies**,...community water systems, wastewater treatment systems, public power.
- Authorizes public agencies to “...purchase traditional replacements for medium- and heavy-duty vehicles at the end of their useful life...when needed to maintain reliable service and respond to major foreseeable events...**without regard to the model year of the vehicle being replaced.**”
- March 2024: CARB re-opened ACF regulations to incorporate AB 1594 requirements
- Oct 2024: CASA commented on draft regulatory language from CARB
- Feb 2025: CASA reviewed/commented on revised rulemaking language from CARB
- July 2026: CARB released 45-day Regulatory Package, CASA commented and testified
- **Sept 25th Public Hearing – staff released Resolution 25-9, Board approved following changes to ACF:**
  - Extends the 50% ZEV replacement requirement to 2030 (vs 2027)
  - Streamlines the process for exemptions
  - Increases vetting of viable vehicle manufacturers
- **Board approved despite over 50 comments stating the regulation is insufficient!**

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## Actions Since September 25th Board Hearing



- Board Members Guerra, Hopkins, Ortiz-Legg, Balmes, and Pacheco-Warner expressed concern about workability and impact to SB 1383 implementation and status of Resolution 23-13
- CASA met with staff Nov 17th and Dec 9th to discuss biogas/RNG data and 15-Day Changes
- CASA submitted comments on/redlines to staff's informal draft of 15-day changes Dec 15
- Roundtable w/ Supervisor Hopkins staff Jan 22nd, discussed needed changes, sent to EO
- **CASA invited to March 9th Drive Forward Vehicle Standards/Strategies workshop to discuss:**
  - Interest in and potential future demand for using fuel cell technology in refuse and recycling trucks
  - Potential for refueling these trucks with hydrogen produced from landfill gas or biodigester gas
- **Outreach to Board Members underway, expect formal 15-day draft end of February**
- Other activities:
  - CARB Community Evening Meeting February 17th to provide summary of Clean Transportation Incentives
  - Governor issued EO N-27-25 requiring new vehicle regulations (supporting EVs) – Advanced Clean Cars III
  - **NOTE: Ford halted production of F-150 Lightnings pivoting to hybrids, GM ramped down truck EV production**

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## State Legislative Update



- Bill Introduction Deadline was February 20
- Next CASA State Legislative Subcommittee meeting is March 13
  - To Join, Contact Spencer Saks at [ssaks@casaweb.org](mailto:ssaks@casaweb.org)



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## Member Updates

- Proposed NPOC/POC Headworks Concentration Limits
- Coordination/Communication with Princeton University's WWTP-Related GHG Emissions Research Team
- Subcommittee Participants needed:
  - Engineering Program Manager (EPM) Process Flowchart Review Subcommittee
  - Strategic Plan and Rule Making Subcommittee
- Next AIR Committee Meeting Locations?



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## Upcoming Meetings

- CWEA Annual Conference – April 7-10 (Sacramento)
- **Next AIR Committee Quarterly Meeting: May 20 (location TBD)**
- CASA Annual Conference – August 4-7 (Napa)



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## Thank You – Happy (nearly) Spring!



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