

# **BACWA-Bay Area Air District Implementation Workgroup Meeting Agenda**

**Date:** January 26, 2026  
**Time:** 1:30-3:30 pm  
**Location:** Bay Area Air District Offices (375 Beale Street, Suite 600, San Francisco, CA 94105)/Zoom  
**Zoom Link:** Link provided in meeting invite  
**Call-in:** Details provided in meeting invite

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- 1) **Introductions (All)**
- 2) **Outlook on Engagement**
  - a) Engineering Project Manager position
    - i) Update from BACWA on review of MOU and Process Flow Chart
    - ii) Update from Air District on BACT Manager
  - b) Update from Air District on Source Testing
    - i) Workshop/Outreach Efforts to Source Testers
    - ii) Staff Updates
    - iii) Next Steps
  - c) Update from Air District on Strategic Plan and Resulting Rule Making Priorities
    - i) Update from Air District on Anaerobic Digester White Paper
    - ii) Update from Air District on Status of Rule 11-18 Amendments
    - iii) Update from Air District on Permit Streamlining Taskforce/Regulation 2
  - d) Update from Air District on Review of the CASA Statewide Air Toxics Pooled Emissions Study Plan
    - i) Proposed Plan submitted to CAPCOA on 11/18/2025
  - e) Update from Air District on Status of Edits to Standard Permit Conditions
    - i) BACWA shared comments on 10/16/2025
  - f) Update from Air District on SFPUC Refinery Rules
- 2) **Other Opportunities for Collaboration between BACWA and Air District**
- 3) **Decision/Action Item Summary**
- 4) **Next Meetings**
  - a) **Quarterly Meeting:** TBD – April 20, 2026?
- 5) **Adjourn**

| Subject  | Actions  | Lead   | Initiated                           | Status                                | General Comment   |
|--|--|--|-------------------------------------|---------------------------------------|---|
| a) Report to the Air District Board on Workgroup Activities                  | <i>Air District to include Report in Air District Board meeting packet.</i>  | Air District   | 4/2023                              | Complete                              | Lorien Fono presented on July 17, 2024, at the Stationary Source Control Committee meeting. Next update anticipated in 2026.  |
| b) Edits to Standard Permit Conditions                                       | <i>BACWA submitted comments on most recent draft SPCs (anaerobic digestion, cogeneration engines, and waste handling).<br/>Brenda has begun work on additional SPCs for BACWA review. Source Testing engaged in development of SPCs.<br/>Consider source testing in permit conditions. Revisions to the Permit Handbook include Source Testing to review SPCs (permit engineer/supervisor to consult with Source Testing).</i> | Air District<br><br>Air District                                     | 2/2023<br><br>7/2022                | Ongoing<br><br>Ongoing                | BACWA to work directly with Brenda Cabral and copy Sanjeev on emails. The Air District provided initial feedback to BACWA in May 2024. BACWA to provide comments in October 2025. BACWA and the Air District to work together to discuss comments and additional SPCs. The Air District to continue working internally to include appropriate test methods in SPCs.   |
| c) Source Testing  | <i>Jerry would like to receive source test protocols as early as possible. Offered to review RFPs for source testing.<br/><br/>Source Test has started workshops with source test contractors. The first meeting was in July 2025, and the second one is scheduled for October.<br/><br/>Discuss possible alternative source testing schedules.</i>  | BACWA & Air District<br><br>Air District<br><br>BACWA & Air District | 6/2024<br><br>7/2025<br><br>10/2025 | Pending<br><br>Ongoing<br><br>Pending | The Air District and source test specialists are under-resourced. BACWA has shared with member agencies that the Air District needs to receive protocols as soon as available to facilitate review by the Air District prior to testing. BACWA shared the <a href="#">list of CARB certified source test companies</a> with member agencies.<br><br>BACWA and Source Test to discuss ways to potentially reduce source testing frequency (and save money), perhaps using sensors or similar technology. |
| d) Rule 11-18 Amendments   | <i>Air District amending Rule 11-18.</i>   | BACWA  | 2/2024                              | Ongoing                               | BACWA is engaging with Rulemaking process. Comment letter on the amendment concepts was submitted February 29, 2024. Comment letter on the draft rule language was submitted October 13, 2025. The proposed rule package is expected to go to the Board Q1 2026.  |
| e) Air District/CASA Statewide Air Toxics Pooled Emission Study Coordination | <i>Coordination via CASA and with CARB.<br/><br/>CASA to meet with Air District.</i>   | CASA<br><br>CASA   | 12/2020<br><br>2/2023               | Ongoing<br><br>Complete               | First meeting with the Air District on December 7, 2022. Track alignment between CARB two-step process and Bay Area Air District Rule 11-18.  |

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|   |   |                      |        |         | Meeting with CASA and Air District occurred January 14, 2025. Next step is submitting a draft plan to CAPCOA . Sanjeev is the point of contact for the Air District.  |
| f) Air District Strategic Planning Initiative | <i>BACWA will track Finance and Administration Committee (FAC) agendas to identify opportunities to engage in Strategic Planning.</i>   | Air District & BACWA | 2/2023 | Ongoing | BACWA to monitor.<br>At the 7/16/2025 FAC meeting, staff presented the concept of a permit task force that would include industry. BACWA would like to participate.   |
| g) Review PM 2.5 Local Risk Method            | <i>BACWA to monitor Stationary Source, Advisory Council, and Community Advisory Council meetings. Air District staff engaged in Rule Development for Regulation 6 Particulate Matter</i>  | BACWA                | 7/2022 | Ongoing | The Air District finalizing draft methodology. Advisory Council is considering Cumulative Impacts, particularly with respect to Indirect Sources (like warehouses).   |
| h) Climate Pollutants                         | <i>Air District Rule Development working on white paper on Sewage Treatment and Anaerobic Digestion. May become part of Regulation 13, if there needs to be a rule. BACWA to assist with technical support related to POTWs, as appropriate</i> | Air District         | 6/2023 | Ongoing | Chris Easter from Rule Development is the point of contact. Initial meeting September 30, 2024. BACWA to continue to provide informational support to staff. The Air District has reached out directly to a number of BACWA members. Draft White Paper expected early 2026. |
| i) Engineering Program Manager Pilot Program  | <i>Air District Board approved two, three-year Engineering Program Manager positioned as part of a pilot to help streamline permit processing.</i>  | Air District         | 7/2025 | Ongoing | BACWA is engaging in the process to determine how member agencies might participate in the EPM pilot. BACWA and Air District staff to meet in early December to discuss what participation might look like for the sector.  |