

BACWA-Bay Area Air District Implementation Workgroup Meeting Agenda

Date: May 4, 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

- 1) **Introductions**
- 2) **Next Meetings**
 - a) **Quarterly Meeting:** August 17 or September 14
- 3) **Outlook on Engagement**
 - a) Update from Air District on Strategic Plan and Resulting Rule Making Priorities
 - i) Update on Status of Rule 11-18 Amendments
 - ii) Update on Anaerobic Digestion White Paper
 - iii) Update on the Monthly Permitting Efficiency Task Force
 - b) Update from Air District on Engineering Program Manager Pilot
 - c) Update from BACWA on the CASA Statewide Air Toxics Pooled Emissions Study
 - d) POTW Inspections
 - e) Establish date for Update Report to Stationary Source Committee or Board
- 4) **CASA De-siloing Initiative**
- 5) **Working Session on Edits to Standard Permit Conditions**
 - a) Policy Issues
 - i) How Rules are translated into permit conditions
 - ii) Unintentional disincentivizing of environmentally beneficial projects
 - iii) Limits on biogas production and food waste processing
 - iv) Cost effectiveness and affordability
 - b) Line-by-line edits
 - c) Set up a meeting to wrap up review
- 6) **Other Opportunities for Collaboration between BACWA and Air District**
- 7) **Decision/Action Item Summary** (see attached table)
- 8) **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). Brenda has begun work on additional SPCs for BACWA review. Source Testing engaged in development of SPCs. 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 Air District	2/2023 7/2022	Ongoing 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 provided 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. Source Test has started periodic workshops with source test contractors. Discuss possible alternative source testing schedules.</i>	BACWA & Air District Air District BACWA & Air District	6/2024 7/2025 10/2025	Pending Ongoing 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 list of CARB certified source test companies with member agencies. 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 letters on the draft rule language were submitted October 13, 2025, and April 17, 2026. The proposed rule package is expected to go to the Board on June 3, 2026.
e) Air District/CASA Statewide Air Toxics Pooled Emission Study Coordination	<i>Coordination via CASA and with CARB. CASA to meet with Air District.</i>	CASA CASA	12/2020 2/2023	Ongoing 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.

	<i>Air District to provide feedback to CAPCOA</i>	Air District	11/2026	Ongoing	Meeting with CASA and Air District occurred January 14, 2025. Draft plan was submitted to CAPCO to CAPCOA in November 2025. Air District comments anticipated by end of January 2026. 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 Air District & BACWA	2/2023 1/2026	Ongoing	BACWA to monitor. Air District established the Permitting Efficiency Task Force January 2026. BACWA participating as a panelist in the monthly meetings.
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	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 later in 2026 for review and comment by BACWA and public. Chris Easter from Rule Development is the point of contact.
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 BACWA	7/2025 1/2026	Ongoing Ongoing	BACWA is engaged in the beta phase of the EPM pilot program (to run through June 2026). Three member agencies have been selected for the beta phase.