



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

Quarterly Meeting
May 20, 2026

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Agenda

- Introductions
- BACWA-Bay Area Air District (Air District) Implementation Workgroup
- Engineering Program Manager Pilot Program
- Air District Rule Development
- Standard Permit Condition Update
- Air District Source Test Update
- CARB Statewide Air Toxics Pooled Emissions Study
- CARB Advanced Clean Fleet Regulations Implementation Update
- Water Environment Research Foundation Updates
- Open Discussion/Member Updates
- Adjourn (Next Meeting: August 19, 2026)



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BACWA-Air District Implementation Workgroup Updates from May 4th Meeting

- Outlook on Engagement
 - Strategic Plan and Resulting Rulemaking Priorities
 - Engineering Program Manager Position
 - CASA Statewide Air Toxics Pooled Emissions Study Coordination
 - POTW Inspections
 - Update Report to the Stationary Source Committee
 - CASA's De-siloing Initiative
 - Status of Edits to Standard Permit Conditions
- Other Opportunities for Collaboration between BACWA and Air District



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BACWA-Air District Implementation Workgroup Upcoming on August 17th

- Possible Topics
 - Update from Air District on Engineering Program 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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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.

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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
- New MOU expected July 2026



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Air District Rule Development

Rule Development and Public Engagement



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Air District Rule Development

- Anaerobic Digestion White Paper – draft for public comment Q3 2026
- Regulation 13 – No imminent rule making
- Rule 11-18 Amendments – BACWA provided comment letter; no workshops; Board Presentation scheduled June 3, 2026
- Permit Streamlining regulations (Regulation 2) to be prioritized as directed by Air District Board
- Permit Streamlining Task Force established and integrated with Air Board’s Ad-Hoc Permit Streamlining Committee
 - Fifth Meeting held on 5/19/26



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Permit Streamlining Efforts

Permitting Efficiency Taskforce & BOD Ad Hoc

Permitting Efficiency Taskforce

- Members represent facilities, associations (e.g., BACWA), engineering firms, local communities, and NGOs
- Ongoing dialogue to inform process, policy and rule changes, understand impacts on communities and applicants
- Meets monthly, with listen-only access for non-members

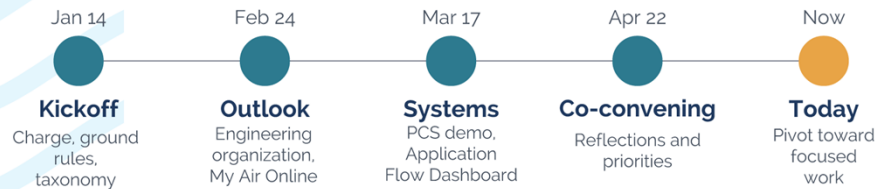
BOD Ad Hoc on Permitting

- Board established in September 2025
- Directors Adams (Contra Costa), Gioia (Contra Costa), Gonzalez (Alameda), Haubert (Alameda), Medina (Santa Clara), and Tam (Alameda)
- Meets bimonthly, with quarterly meetings with the Taskforce

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Permit Efficiency Task Force Approach

Where We Are



Key takeaway from April 22

Both taskforce members and Board Ad Hoc Directors expressed shared interest in moving toward more focused engagement on specific permitting topics.

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Permitting Concerns

Topics Raised Across Taskforce Conversations

Bolded items represent topics where the signal has been strongest across multiple conversations

1. **Rework loops and applications returning to applicants multiple times before reaching authority to construct**
2. **Application completeness, what is required at submittal, and how determinations are communicated**
3. Pre-application engagement and the value of substantive conversation before formal submittal
4. **Predictability and reliability of the review process, including knowing what to expect at each stage**
5. **Visibility into where an application is in the review process, including which actions are pending and with whom**
6. **Communication standards during review, including notification when status changes and when information is needed**
7. Notification practices when an application transitions between statuses or between staff
8. Case continuity when permit engineers are reassigned, promoted, or transition between roles
9. Response timeframes for applicant supplementation, including flexibility for complex projects
10. **Consistency in how the permit handbook and rules are interpreted and applied across applications**
11. **The relationship between engineer discretion and established rules, handbook guidance, and policy**
12. **BACT determinations, including methodology, threshold triggering, and consistency with prior determinations**
13. Potential to Emit methodology, including how throughput limits and operational assumptions are calculated
14. Alteration versus modification, and how the distinction is applied in practice
15. Emission factor, transparency, including documentation, citation, and the basis for system defaults

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Permitting Concerns

Topics Raised Across Taskforce Conversations (cont.)

Bolded items represent topics where the signal has been strongest across multiple conversations

16. Documentation of policy determinations, engineering evaluations, and regulatory analysis
17. Standard permit conditions for common source categories, equipment types, and operating scenarios
18. Pre-approved equipment lists and standardized determinations that can streamline routine permitting
19. **Permit handbook updates and the relationship between handbook guidance and current practice**
20. BACT guidelines and the work to update and clarify them
21. Implementation memos and guidance documents that clarify how the agency applies specific rules
22. Net environmental benefit and innovative or zero-emission technology pathways
23. **Pathways for elevating concerns about application reviews when an impasse or significant delay arises**
24. Staff knowledge of permitted operations and the sectors being regulated
25. **Community access to information about permit applications, decisions, and emissions**
26. Public participation and how community input is solicited, evaluated, and reflected in decisions
27. Earlier visibility for projects in AB 617 communities, including communication about timeline expectations
28. Sector-specific permitting realities, including multi-location operations, and project sequencing
29. Sequential multi-step projects where one permit decision affects downstream environmental improvements

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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
 - Initial conversation to discuss SPCs and future meetings to be scheduled



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CASA De-Siloing Initiative: “From Silos to Systems”

- Statewide effort to highlight regulatory silos
- Documenting case studies
- Planning to print in July



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Air District Source Testing Update

- Inspection, Site Visits, and Training



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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

- CASA submitted comments on latest ACF amendments on April 17
 - Latest amendments decreased flexibility
- CARB staff producing another set of amendments and a 15-day Notice is expected
- CARB announced a new CA Clean Fuel Rewards program, launching in June, for eligible public and private fleets



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Water Environment Research Foundation Updates



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Member Updates

- Engineering Program Manager (EPM) Process Flowchart
- Strategic Plan and Rule Making Subcommittee
- Next AIR Committee Meeting Locations?



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Upcoming Meetings

- **Next AIR Committee Quarterly Meeting: August 19 (location TBD)**
- CASA Annual Conference – August 4-7 (Napa)
- WEFTEC 2026 – September 26-30 (New Orleans)



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Thank You – Happy (nearly) Summer!



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