



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

Quarterly Meeting
August 19, 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
- Open Discussion/Member Updates
- Adjourn (Next Meeting: November 18, 2026)



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BACWA-Air District Implementation Workgroup Updates from August 17th Meeting

- Outlook on Engagement
 - Strategic Plan and Resulting Rulemaking Priorities
 - Engineering Project Manager Position
 - CASA Statewide Air Toxics Pooled Emissions Study Coordination
 - POTW Scheduled Training Visits
 - Update Report to the Stationary Source Committee
 - 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 December 7th

- 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
 - Standard Permit Conditions Meeting with Air District
- 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

- 6-month Beta Phase BACWA-Air District MOU (now complete)
- 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

- Three-Year Pilot Program
- New MOU expected August 2026
- Access to the EPM

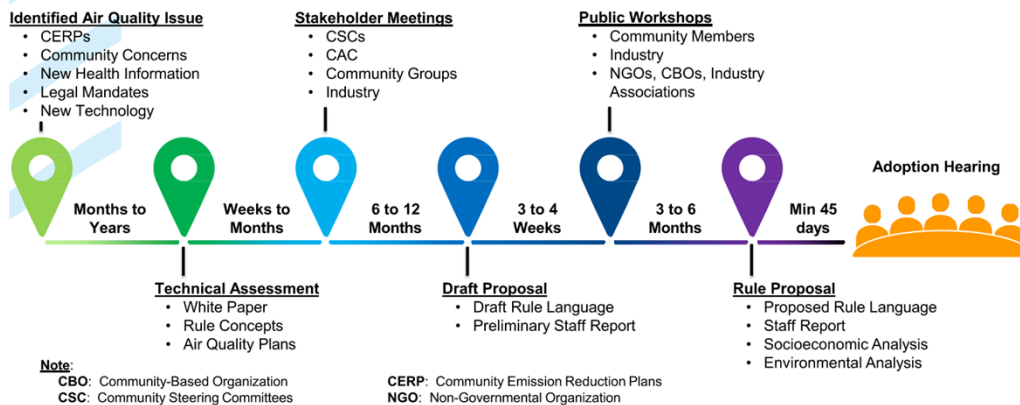


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Air District Rule Development

Rule Development and Public Engagement



Bay Area Air District

MAY 16 – 17, 2025 • COMMUNITY ADVISORY COUNCIL SPECIAL MEETING/RETREAT

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Air District Rule Development

- Rule 11-18 Amendments
 - BACWA provided comment letter
 - Amendments Adopted June 3, 2026
 - Concerns remain about timelines



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Air District Rule Development

- Anaerobic Digestion White Paper – draft for public comment later 2026
- Following up with BACWA agencies
- Requested data from facilities on digester gas PRV releases, pressure sensor readings, acoustic sensor readings, etc.



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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

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

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 Efficiency Task Force

- Working Group
 - Routine Permitting (June)
 - POC/NPOC/NMOC (July)
 - Potential to Emit (August)



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Standard Permit Condition Update

- Standard Permit Conditions
 - Developed subcommittee to review draft SPC (anaerobic digestion, cogen, and organic waste handling); Awaiting headworks
 - 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 the Fall



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Air District Source Test 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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CARB Statewide Air Toxics Pooled Emissions Study: Criteria Pollutants & Air Toxics Reporting (CTR)

- Submitted draft plan to CAPCOA November 2025
- Met with CAPCOA June 10, still no consensus
- Posted source test specialist RFQ and hosted two WWTP tours; SOQs due August 28th
- Laboratory RFQ to follow
- To learn more: attend CASA ACE workgroup meetings or Pooled Emission Study subgroup meetings



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Status of CARB Advanced Clean Fleet Regulations

- CASA submitted comments on latest ACF amendments on April 17
- CARB staff released 15-day Changes/Guidance, clarifying contracted services must comply with ACF
- Final Statement of Reasons says they are going back to original interpretation on how ACF applies to contracted services – meaning if a public agency “dispatches” a contracted vehicle, only then must it comply
- Office of Administrative Law (OAL) decision expected September 11



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Open Discussion/Member Updates

- Collection System NOVs?
- Data on costs associated with lengthy permit application review times?
- Next AIR Committee Meeting Locations?



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Upcoming Meetings

- WEFTEC 2026: September 26-30, 2026 (New Orleans)
- **Next AIR Committee Quarterly Meeting: November 18, 2026 (location TBD)**
- CASA Winter Conference: January 27-29, 2027 (Indian Wells)



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Thank You – Happy (nearly) Fall!



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