Air Toxics: Collaboration with California’s Air Resources Board & Local Air Districts

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Two state-wide air toxics programs were updated in 2020

AB 617: Criteria Air Pollutant and Toxic Air Contaminant Reporting Regulation (2020)
- Implements statewide annual reporting of criteria air pollutant and toxic air contaminant emissions data from facilities.
- Establishes new policies to improve emissions inventory data (critical for understanding sources contributing to adverse health risks or other impacts at local, regional, and statewide levels).

AB 2588: Air Toxics "Hot Spots" Program (1987)
- Establishes a statewide program for inventorying air toxics emissions from individual facilities, as well as requirements for risk assessments and public notification of those risks.
AB 617: Criteria Air Pollutant & Toxic Air Contaminant Reporting

- Gives CARB authority to “harmonize” air monitoring, reporting, & local emissions reduction programs from stationary sources
  - Assess community exposure
  - Establish criteria for air monitoring
  - Identify source contributions and strategies for emissions reduction
- Targets:
  - Establish emission reduction targets, schedule, & enforcement programs
  - Develop uniform statewide reporting
  - Air Districts to support annual reporting
AB 2588: Air Toxics "Hot Spots" Program Updates

• Goals of the Act/Program are to:
  – Collect emission data (list of >500 compounds)
  – Identify facilities having localized impacts
  – Ascertain health risks
  – Notify nearby residents of significant risks
  – Reduce significant risks to acceptable levels

• 2020 updates expand the compound list to >1,000 compounds, however:
  – Many of the compounds have unknown toxicity levels
  – Many of the compounds have unknown emission factors
  – Many of the compounds are not relevant to WWTPs
How can WWTPs comply with the Air Toxics Reporting and Inventorying Programs?

• Negotiated phased compliance, allowing WWTPs to report business-as-usual through 2028

• In meantime, wastewater sector must perform a “two-step process” to determine shortlist of compounds
  1. Scanning air space of unit processes for determining detectable compounds (including PFAS)
  2. Quantification Process (Mimic 1990 Pooled Emissions Estimation Program, PEEP)
     • Methods approved by CA Air Pollution Control Officers Association (CAPCOA)
     • Toxicity potentials approved Office of Environmental Health and Hazard Assessment (OEHHA) Scientific Review Panel
If your local air district asks you to estimate emissions for compounds without approved methods – let us know!
Next Steps

• Fall 2021, CASA to draft proposal for performing the two-step process with participating WWTPs, CARB, and local air districts
  • Timeline (phased approach over next 5 years)
  • Estimated budget for each phase for participating WWTPs/regional associations to address in upcoming budget planning discussions

• Determine governing structure for participating agencies (e.g., MOU, MOA, JPA)

• Continue collaboration with CARB and local air districts to perform two-step process
Questions
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Mimic the 1990 Pooled Emissions Estimation Program (PEEP)

- Perform a 2020 pooled emissions estimating program (PEEP) to update outdated emission factors for short-listed toxic compounds

**Purpose:** Provide participating agencies a standard estimation methodology for determining air toxics emissions from their respective facilities. Previous study:

- 25 POTWs across CA formed a JPA
- 18 unit processes (liquid, solid, gas)
- 20 sites (managed as north and south)
- 3 rounds of sampling over 11 months
- Project duration: 2 years (1989-1990)
- Budget: $2.5M (1990)

**Result:** Short-list of targeted compounds and updated emissions factors
Who is CASA?

- CASA is the leading voice for clean water agencies on regulatory, legislative and legal issues. We represent more than 125 public agencies that engage in the collection, treatment or disposal of wastewater.
- Our advocates engage with the State Legislature, Congress, and various regulatory agencies on behalf of our member agencies.
- We facilitate member engagement on important issues through our committees, workgroups, workshops, webinars, forums and events, including our two major conferences: a Winter Conference in January and Annual Conference in August.
- Our communications program includes social media engagement, a biweekly newsletter, and member alerts on important issues.
- Both elected Board/Council members and managers/staff at member agencies are active in all aspects of the organization.