How can WWTPs comply with the Air Toxics Reporting and Inventorying Programs?

• AB 2588 Hot Spots compound list is >1700 compounds (from >500)
  • 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

• CASA worked with CARB on phased compliance, allowing WWTPs to:
  • Report business as usual through 2028 (begin reporting in 2029 for 2028 data)
  • Perform a “two-step process” for determining a shortlist of compounds
    • Scanning air space of unit processes to determine detectable compounds
    • Determining the sampling and analysis methods to quantify emissions
      (Mimic 1990 Pooled Emissions Estimation Program, PEEP)
How can WWTPs comply with the Air Toxics Reporting and Inventorying Programs?

• Two-Step Process:
  1. Scan air space of unit processes to determine detectable compounds
  2. Quantify emissions (Mimic 1990 Pooled Emissions Estimation Program)

Result: Short-list of compounds and emissions factors determined by participating agencies as well as local air district and CARB staff

Cost estimate being developed for FY 23/24 budgeting
If your local air district asks you to estimate emissions for compounds that do not have approved methods – let us know!
Next Steps (summer/fall 2022)

CASA 2022 actions:

- Draft approach for Step 1 (examining scanning and source test requirements)
- Identify participating/field sampling agencies
- Select governing structure
- Setting monthly subgroup meetings going forward!
Questions

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Mimic the 1990 Pooled Emissions Estimation Program (PEEP)

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

- 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