

AIR TOXICS & Climate Vulnerability

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Two programs getting updated this calendar year...

- AB 617: Criteria Air Pollutant and Toxic Air Contaminant Reporting
 - Implements statewide annual reporting of criteria air pollutant and toxic air contaminant emissions data from facilities. It establishes new policies to improve emissions inventory data (which is critical to understanding the sources of emissions contributing to adverse health risks or other impacts at the local, regional, and statewide level).
- AB 2588: Air Toxics "Hot Spots" Program
 - Establishes a statewide program for the inventory of air toxics emissions from individual facilities, as well as requirements for risk assessment and public notification of potential health risks.

AB 617: Criteria Air Pollutant & Toxic Air Contaminant Reporting

- Enacted January 1, 2020
- Gives CARB the authority to “harmonize” community air monitoring, reporting, & local emissions reduction programs for CAPs and TACs (and GHGs) from stationary sources
 - Assess community exposure
 - Establish criteria for air monitoring
 - Identify source contributions and strategies for emissions reduction
- Working to:
 - Establish emission reduction targets, schedule, & enforcement programs
 - Develop uniform statewide reporting (CAPCOA)
 - Get Air Districts to support annual reporting



AB 617: Criteria Air Pollutant & Toxic Air Contaminant Reporting

- Applicability thresholds for stationary sources:
 - Subject to GHG Mandatory Reporting Regulation
 - Emit 250+ tpy of a nonattainment criteria air pollutant or its precursor
 - Receive an “elevated” Air Toxics Hot Spots (AB 2588) prioritization based on cancer or non-cancer health impacts
- *CARB wants to add as part of its 2020 amendments...* a general sector list (table), including WWTPs: 10 MGD WWTPs w/ “covered systems” to report the complete AB 2588 [list of toxic compounds](#) (over 600 compounds) on an annual basis (5 MGD “uncovered systems”)
 - “Systems” refers to primary treatment per a definition found in the original AB 2588 program language

Larger WWTPs have already been reporting (to local Air Districts) for an established short-list of compounds!

AB 2588: Air Toxics "Hot Spots" Program Updates Underway

- Enacted in 1987
- Goals of the Act/Program are to:
 - Collect emission data (list of >600 compounds)
 - Identify facilities having localized impacts
 - Ascertain health risks
 - Notify nearby residents of significant risks
 - Reduce significant risks to acceptable levels
- 2020 updates include expanding the compound list by >800 compounds (full list to be >1400 compounds) – KEY ISSUES:
 - AB 617 reporting may require reporting of these compounds
 - Many of the new compounds do not have known toxicity levels
 - Many of the new compounds do not have known emission factors



In their absence, they propose using factors determined for “similar” compounds for use in Reporting and Health Risk Assessments!

The draft default emission factors will be used as a resource for permitting staff, but facilities can perform source testing to obtain site- or sector-specific data, if requested.

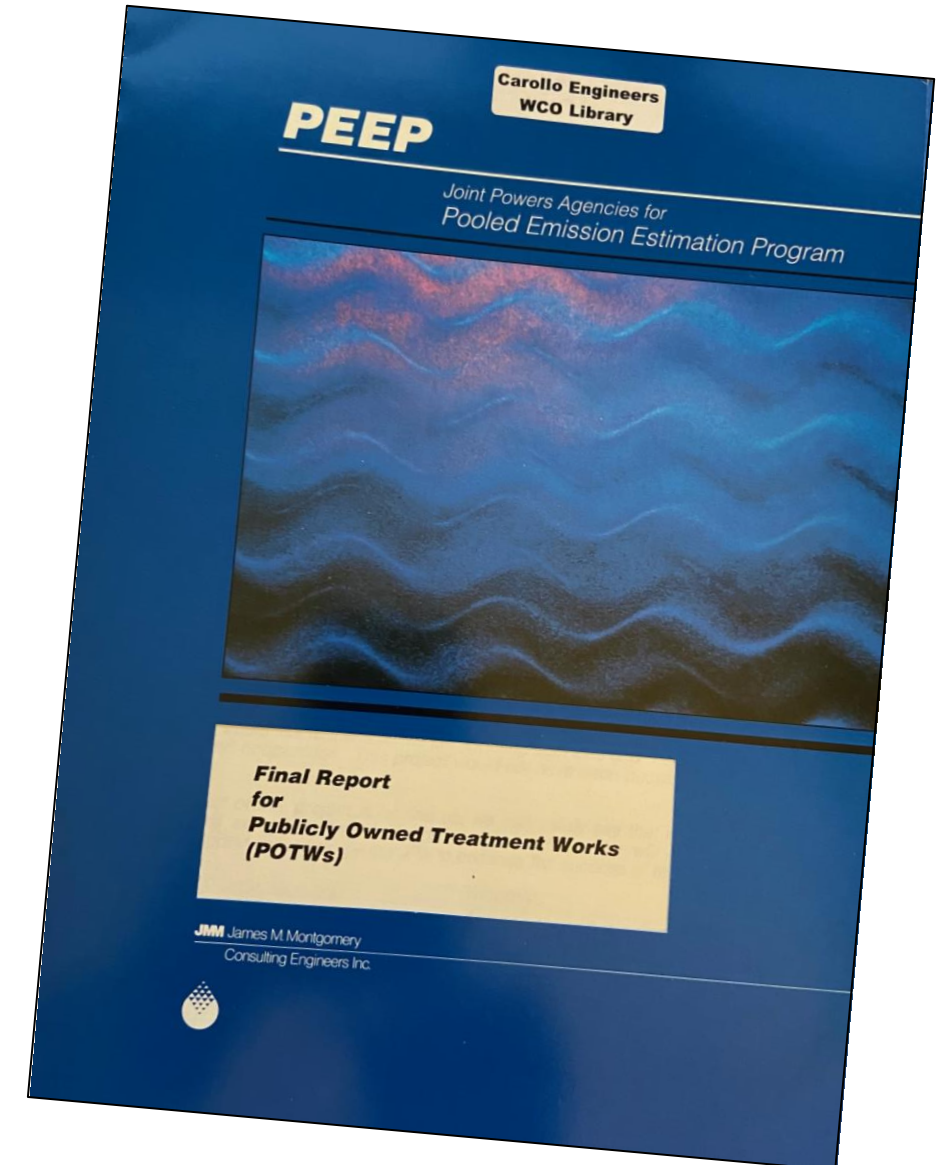
Wastewater industry action items:

- Weigh in on expanded list of compounds under AB 2588 – toxicity determination and sample/test methods
- Work with CARB to develop/adopt a short list of toxic compounds relevant to WW sector under AB 2588
- Perform a 2020 pooled emissions estimating program (PEEP) to update outdated emission factors for the short-listed toxic compounds (both existing and newly added compounds)

PEEP 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 emissions factors determined by participating agencies and air district staff



Next Steps

- Share information with POTWs/regional associations for consideration in budget discussions (SCAP is discussing \$50k-100k per participating agency to start)
- CASA to work with CARB to determine short-list of toxic compounds or an approach to do so
- Discuss approach with potential participating agencies for updating the PEEP
 - Phases
 - Regional sampling
 - Formation of a MOU or JPA

SWRCB Climate Change Preparedness Survey

- State Water Board seeks feedback on:
 - Permit modifications and other regulatory requirements to reduce vulnerability to flooding, storm surge, and sea level rise.
 - Use of U.S. EPA's Climate Resilience Evaluation and Awareness Tool (CREAT) or a comparable approach to identify vulnerabilities to climate change impacts at water and wastewater utilities.
- State Water Board to distribute revised survey...
 - Within the next month!!
 - 45-day response period
 - Planning a webinar to answer questions regarding the survey

TECHNICAL REPORT TO THE STATE WATER BOARD

[To fulfill your obligation to submit the technical report, you must complete the survey online at [web link](#). A copy of the survey questions is below.

CLIMATE CHANGE PREPAREDNESS SURVEY

Please be advised that completing this survey is not a substitute for compliance with other reporting requirements or action plans, does not alter permit conditions, and is not a commitment of funding.

Agency: _____

Check facilities your agency is responsible for:

Collection Interception Treatment Disposal

Approximate population receiving wastewater service from your agency: _____

1. Has your agency conducted facility or infrastructure assessment(s), or prepared an asset management plan that includes new or increased threats from climate change or future extreme weather events (e.g., sea level rise, storm surge, high intensity precipitation, flooding, drought, or extreme heat)?

Yes No Work is underway

1a. Is there a local or a regional assessment or plan (e.g., Climate Action Plan, city or county General Plan, Integrated Regional Water Management Plan) that addresses new or increased threats to infrastructure resulting from climate change, and includes your system?

Yes No

1b. Which components were covered by the assessment/planning? (Check all that apply)

<input type="checkbox"/> Collection system	<input type="checkbox"/> Facility access
<input type="checkbox"/> Interceptors	<input type="checkbox"/> Pump stations
<input type="checkbox"/> Treatment facilities	<input type="checkbox"/> Wet weather facilities
<input type="checkbox"/> Disinfection	<input type="checkbox"/> Power source / Biogas / Cogeneration
<input type="checkbox"/> Discharge facilities/outfalls	<input type="checkbox"/> Telecommunications

1c. Are results of the assessment/planning available to the public?

Yes No

If Yes, please provide the website, or where the document(s) can be found:

October 2019, Simi Valley Tentative Order:

- Special Studies, Technical Reports, and Additional Monitoring Requirements
 - Climate Change Vulnerability Assessment & Mitigation Plan:
 - Considering flooding, wildfire, sea level rise, or other climate-related changes
 - Assess/manage threats that may impact a wastewater treatment facility's...operation, influent quality, its collection system, and water quality, including changes to influent water temperature and pollutant concentrations, and beneficial uses.
 - The Climate Change Plan is due 12 months after adoption of the Order.