

# **BACWA-Bay Area Air District Implementation Workgroup Meeting Agenda**

**Date:** April 21, 2025  
**Time:** 1:00-3:00 pm  
**Location:** Bay Area Air District Offices (375 Beale Street, Suite 600, San Francisco, CA 94105)/Zoom  
**Zoom Link:** Link provided in meeting invite  
**Call-in:** Details provided in meeting invite

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- 1) **Introductions (All)**
- 2) **Outlook on Engagement**
  - a) Update from BACWA and Water Board on Nutrient Reduction requirements and collaborative decision-making
  - b) Permit Streamlining – Progress on enhancing permit timing and transparency ([Lorien and all](#))
    - i) Update on fee increase
    - ii) Resource allocation based on previous workload
    - iii) Update on industry-funded project management and approach to workflow
  - c) Update from Air District on Strategic Plan and Resulting Rule Making Priorities
  - d) Update from Air District on Anaerobic Digester White Paper
  - e) Update from Air District on Status of Rule 11-18 Amendments
  - f) Update from BACWA on the CASA Statewide Air Toxics Pooled Emissions Study Coordination
  - g) Update from Air District on Future BACT Determination Process/Manager and Guidebook Updates
  - h) Air District Source Testing for Compliance Purposes
  - i) Update from BACWA on Status of Edits to Standard Permit Conditions
  - j) SB 318 (Becker) – Air pollution: stationary sources: best available control technology: indirect sources.
- 3) **Other Opportunities for Collaboration between BACWA and Air District**
- 4) **Decision/Action Item Summary**
- 5) **Next Meetings**
  - a) **Quarterly Meeting:** TBD – July 14, 2025?
- 6) **Adjourn**

Subject	Actions	Lead	Initiated	Status	General Comment
a) Air District Strategic Planning Initiative	<i>BACWA will track Finance and Administration Committee agendas to identify opportunities to engage in Strategic Planning.</i>	Air District	4/2023	Ongoing	BACWA to monitor.
b) Anaerobic Digester White Paper (Climate Pollutants)	<i>Air District Rule Development working on white paper on Sewage Treatment and Anaerobic Digestion. May become part of Regulation 13, if there needs to be a rule. BACWA to assist with technical support related to POTWs, as appropriate</i>	Air District	6/2023	Ongoing	Chris Easter from Air District Rule Development is point of contact. Initial meeting September 30,2024. BACWA to continue to provide informational support to staff. Air District has reached out directly to several of BACWA members.
c) Rule 11-18 Amendments	<i>Air District amending Rule 11-18.</i>	BACWA	2/2024	Ongoing	BACWA to engage with Rulemaking process. Comment letter submitted 2/29/2024. Draft staff report and draft rule language anticipated Spring 2025.
d) Air District/CASA Statewide Air Toxics Pooled Emission Study Coordination	<i>Coordination via CASA and with CARB.  CASA to meet with Air District.</i>	CASA  CASA	12/2020  2/2023	Ongoing  Complete	First meeting with Air District 12/7/22. Track alignment between CARB two-step process and Air District Rule 11-18. Meeting with CASA and AIR DISTRICT occurred 1/14/2025. Sanjeev is point of contact for Air District.
e) Permit Prioritization	<i>Air District considering additional staffing (permit application project manager position) to streamline the permit application processing. Discussions are underway regarding how this position might be staffed and/or funded.</i>	Air District	9/30/2024	Ongoing	RWQCB requirements will mean multiple additional permit applications from POTWs to comply with nutrient discharge limits over the next 5-10 years. This is in addition to the "routine" (process updates, replacement, etc.) that are already occurring. BACWA met with Air District to discuss concerns about long permit application review times (12/9/2024).
f) BACT Determination Process/Manager		Air District		Ongoing	Air District staff has proposed new BACT manager position in draft budget for FY 2025-26.
g) Source Testing	<i>Jerry would like to receive source test protocols as early as possible. Offered to review RFPs for source testing.</i>	BACWA & Air District	6/2024	Pending	Air District and source test specialists are under-resourced. BACWA has shared with member agencies that AIR DISTRICT needs to receive protocols as soon as available to facilitate review by

					Air District prior to testing. BACWA shared the <a href="#">list of CARB certified source test companies</a> with member agencies.
h) Edits to Standard Permit Conditions	<p><i>Brenda responded to edits and has begun work on additional SPCs for BACWA review. Source Testing engaged in development of SPCs.</i></p> <p><i>Consider source testing in permit conditions. Revisions to the Permit Handbook include Source Testing to review SPCs (permit engineer/supervisor to consult with Source Testing).</i></p>	<p>Air District</p> <p>Air District</p>	<p>2/2023</p> <p>7/2022</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>BACWA to work directly with Brenda Cabral and copy Sanjeev on emails. Air District provided initial feedback to BACWA 5/2024. BACWA to provide comments. BACWA and Air District to work together to discuss comments and additional SPCs. Air District to continue working internally to include appropriate test methods in SPCs.</p>
i) Review PM 2.5 Local Risk Method	<p><i>BACWA to monitor Stationary Source, Advisory Council, and Community Advisory Council meetings. Indirect Source Rules expected to go to Stationary Source Committee in March 2025.</i></p>	<p>BACWA</p>	<p>7/2022</p>	<p>Ongoing</p>	<p>Air District finalizing draft methodology and sending OEHHA. The Advisory Council is now considering Cumulative Impacts.</p>