



August 1, 2019

Mr. David Edwards
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically via: https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=ctr2018&comm_period=1

Re: California Association of Sanitation Agencies Comments Regarding the Second 15-Day Modifications to the Draft Regulation for Reporting of Criteria Air Pollutants & Toxic Air Contaminants under AB 617

Dear Mr. Edwards:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the second 15-day modifications to the draft regulation for the reporting of criteria air pollutants and toxic air contaminants (15-day modifications) under Assembly Bill 617 (AB 617).

CASA is an association of over 120 California agencies, engaged in advancing the recycling of wastewater into usable water, as well as the generation and use of renewable energy, biosolids, and other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians. Our members are focused on helping the State achieve its 2030 mandates and goals for greenhouse gas (GHG) emissions reductions, which include:

- Reducing short-lived climate pollutant (SLCP) emissions
- Effectively diverting organic waste from landfills
- Providing 50 percent of the State's energy needs from renewable sources
- Reducing carbon intensity of transportation fuel used in the State
- Increasing soil carbon and carbon sequestration in support of the Healthy Soils Initiative, Forest Carbon Plan, and Natural and Working Lands Climate Change Implementation Plan

As you would expect from your fellow dedicated environmental stewards, CASA members provide reliable wastewater treatment to protect public health and the environment, as well as strive to exceed air district requirements. We recognize and support the need to manage criteria air pollutants (CAPs) and toxic air contaminants (TACs) as the state pursues the 2030 GHG emissions reduction target.

Our comments on the 15-day modifications are provided below for your consideration.

We fully support postponing the inclusion of the "Additional Applicability" requirements at this time. We will continue to work closely with you as you gradually expand the program with future phases and strongly encourage adding sources/sectors based on risk presented by the compound(s) and source(s) since not all compounds are equally emitted by all sectors.

Specifically, we request and recommend that the California Air Resources Board (CARB) take an approach that implements a current and accurate reporting process for the wastewater sector. To achieve this, we will proactively work with you to:

- *Develop a Sector-Specific (Short) List of TACs for Monitoring/Reporting.* Because the majority of AB 2588 compounds (see Appendix A-1 of the Emission Inventory Criteria and Guidelines for the Air Toxics "Hot Spots" Program as defined on page A-21 of the draft regulation) are not present in wastewater, there are no municipal wastewater treatment plants (WWTPs) that emit the full list of AB 2588 compounds.

Additionally, sampling and testing for the full list of compounds will incur high costs¹ that are unnecessary and prohibitive for most WWTPs. As discussed and agreed upon in meetings with your staff, we will work together to establish a list of constituents of concern specific to WWTPs, which more accurately represents potential TAC emissions from the wastewater sector. This approach will facilitate transparent reporting of TACs that could pose a real risk to the community.

- *Address Outdated Air District/CARB default emission factors for TACs.* Some of the default emission factors for estimating municipal WWTP TAC emissions are still based on data from the late 1980's², when the influent flow to municipal WWTPs contained a significant contribution from industrial sources of wastewater. Many of those industrial sources either no longer exist or are significantly controlled by pre-treatment and source control programs required by EPA. Use of default emission factors that do not represent current conditions or operations will misidentify and overestimate the magnitude of TAC emissions from WWTPs. We recommend allowing the wastewater sector to develop an approach for updating any outdated default emissions factors. Note that new processes permitted by air districts are typically source tested (versus relying upon default emission factors) and air districts do not require that the full list of AB 2588 compounds be analyzed during the permitting process.

We greatly appreciate the opportunity to provide input on the 15-day modifications and further appreciate your willingness to consider our recommendations and proactively work together toward solutions. Please contact me if you have any questions at (925) 705-6404 or sdeslauriers@carollo.com.

Sincerely,



Sarah A. Deslauriers, P.E., ENV SP
Climate Change Program Manager, CASA

¹ One of our CASA members contacted their source testing contractor to determine the cost and feasibility of quantifying emissions for the complete AB 2588 list of constituents. This source contractor indicated that the full 2588 list cannot be source tested because there are no methods developed for certain constituents, but testing one emission source for a partial list would cost about \$55,600. The typical WWTP has about fifteen emission sources; each of which would need to be quantified in order to obtain an estimate of actual emissions. Consequently, the average cost of testing for this partial list of constituents would be \$834,000 per WWTP. This information not only confirms the high cost of source testing, but also highlights the infeasibility of quantifying emissions for the full AB 2588 list.

² Joint Powers Agencies for Pooled Emission Estimation Program for POTWs produced by James M. Montgomery Consulting Engineers, Inc. completed in 1990.