CAPCOA ENGINEERING MANAGERS COMMITTEE
MEETING MINUTES

April 23, 2018: 10:00 am to 5:00 pm
April 24, 2018: 8:30 am to 12:00 pm

San Joaquin APCD, Fresno
[HYPERLINK "https://www.google.com/maps/place/1990+E+Gettysburg+Ave,+Fresno,+CA+93726/@36.800655,-119.7865905,17z/data=!4m2!3m1!1s0x80945d7e78d1c04b:0xf2de986ad9ead2b0"]

Call in number: (913) 312-9372; Passcode: 398292

MONDAY, April 23, 2018 (10:00 am – 5:00 pm)

Part 1 – Administrative Business (10:00 am to 10:30 am)

1.1. Volunteer to Take Minutes: Amy Roberts volunteered to take minutes
1.2. Introductions/Attendance List

In Attendance:	**By Phone:**
Arnaud Marjollet (Chair), San Joaquin Valley APCD	Laki Tisopulos, South Coast AQMD
Jim Swaney (Vice Chair), San Diego County APCD	Mike Goldman, Santa Barbara County APCD
David Lusk, Butte County AQMD	Mary Giraudo, Monterey Bay ARB
Brian Krebs, Sacramento Metro AQMD	Alam Mangat, Feather River AQMD
Amy Roberts, Sacramento Metro AQMD	Ian Ledbetter, Glenn County APCD
Dora Drexler, San Luis Obispo APCD	Jason Davis, North Coast Unified APCD
Kerby Zozula, Ventura County APCD	Vicki Roush, ?
Ben Beattie, Yolo-Solano AQMD	Sheri Haggard, Mohave Desert AQMD
Brian Clerico, ARB	Gerardo Rios, USEPA (Mon)
Tung Le, ARB (Mon)	Carol Allen, Bay Area AQMD
	Barry Young, Bay Area AQMD
	Lisa Peterson, El Dorado AQMD
	Emmanuel Orozco, Placer County APCD
	Steve Moore, San Diego County APCD (Tues)
	Doug Erwin, San Diego County APCD (Tues)
	Chris Gallenstein, ARB (Mon)
	Dave Edwards, ARB (Mon)

1.3. Additions/Changes to Agenda: Added item on ethanol engines
1.4. Confirmation of upcoming meetings for 2018 (See table below): symposium location confirmed – Lake Natoma in Sacramento.
1.5. Review of Action Items – See attached Action Item Tracking Table (*Attachment 1*): Jorge created folder on CAPCOA webpage to store example ACI permits; dropped item to send Title V rule to Jorge; Tung Le distributed final version of CARB E-notice advisory; continue to send O&G permit conditions to Jorge; Alan sent CAP framework concept paper.

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Date	Host	Location: Room/Address
February 12-13, 2018	San Diego APCD	County Administration Center 1600 Pacific Highway, San Diego, 6th floor conf room
April 23-24, 2018	San Joaquin Valley APCD	1990 E Gettysburg Ave, Fresno
August 20-21, 2018	Yolo-Solano AQMD	1947 Galileo Court, Suite 103, Davis
October 29-31, 2018	Sacramento AQMD	Lake Natoma Inn, 702 Gold Lake Dr, Folsom

Part 2 – ARB Updates (10:30 am to 11:15 pm) – *Tung Le*

2.1. Annual ERC reporting to ARB / ERC Transaction Report: all reports are in; 2017 report will be out in month or so
2.2. Status of E-noticing guidance: posting on website delayed; no other comments except ARB legal concerned about underground rulemaking and want to review language further; if revising NSR rules, go ahead; no expected completion date
2.3. Potential litigation over federal landfill rules: looking to finalize landfill guidance strategy; EPA has yet to approve ARB's submitted strategy; EPA responded that they are not acting on it and they are doing additional rulemaking in the future; ARB has intent to sue over non-implementation of rule; until EPA acts on compliance strategy; continue implementing the methane rule, status quo for now until get resolved. Working group will be formed to develop model Title V permit conditions.
2.4. ARB BACT clearinghouse, recent determinations: ARB asking districts to double check all form fields prior to submitting to clearinghouse; Tung will continue to run the BACT clearinghouse; cost values, emission reductions, cost effectiveness will remain in Industrial Strategies; AB617 will take the findings of the BACT clearinghouse and pull them into the AB617 tech clearinghouse
2.5. Chris Gallenstein retirement: SB288 duties will go with Brian Clerico
2.6. Other Topics/Updates: meeting will be set up with Todd Sax to figure out ARB's view on 10X Fees for other sources.

Part 4 – EPA Updates (11:15 pm to 12:00 pm) – *Gerardo Rios*

Gerardo went through a presentation covering the following topics: NSR SIP Rulemaking, CAA Section 173(a)(4) requirements, project emissions accounting, ozone and PM2,5 SILs guidance, withdrawal of once-in-always-in policy, Title V Fee Guidance, Control Cost Manual.

4.1. Federal Major Modification: Emission calculation (EPA's Memo): Gerardo is trying to get a text-searchable memo; two steps or netting when it comes to NSR calculations: (1) calculate emissions increases only resulting from project, don't look at incidentals, if emissions >/= to the level set by NSR then go on, but if less, then not subject to major NSR; (2) another chance to get out of NSR, look at incidentals for emissions from entire facility; for EGU 5 year look back, take sum of all increase

and if >= to NSR threshold, then subject to major NSR). This memo changes Step 1; important to determine what project is, can count increases and decreases within project; applies to all regulated pollutants under NSR. Districts don't need to make regulatory changes, assuming CFR language already adopted and can account for this change; if adopted model rule, equipment and like-kind replacement, for extreme non-attainment areas will still have to do step 1 to see if applicant is out of NSR

4.2. SD NSR Rule update – EPA now requiring NSR Rule to include CAA Section 173(a)(4) requirement

4.3. Other Topics/Updates
   a. Title V fee and program evaluations: guidance as to main areas that EPA will be looking at their programs, fee analysis. Clarifies sources of funding.
   b. Control Cost Manual has been updated
   c. NSR SIP Rulemaking Updates: PowerPoint shows actions expected for each district for FY18
   d. Ozone & PM2.5 SILs guidance: EPA now have recommended values that should be used when modeling significant PM2.5 impacts
   e. Withdrawal of the Once in Always in Policy: EPA current stance is that they never had the authority this policy granted; memo probably won't change much as far as actual requirements on permits in CA, especially in extreme non-attainment areas; outside of CA there could be bigger changes; other businesses may be able to outcompete CA businesses because they get to reduce control requirements
   f. Ethanol Engines: small engine mfg in Nebraska (Orthman 140 hp engines), asking Butte if it can be marketing in CA; any engine has to be certified through EPA, regardless of fuel being used; it must be certified

Part 3 – AB 617 Updates (1:30 pm to 3:00 pm)

3.1. CARB Centralized Databases in Relation to AB 617 Requirements (Cassie Lopina)
   a. ARB working on ways to ensure BACT determinations can still be reviewed, updated, to simplify and improve time it takes to update information.
   b. BACT clearinghouse will be available in early May; BACT will be submitted to Districts for review before putting a public version out for comment
   c. Sub-category of industrial sources defined in cap and trade; pollution mapping tool indicates what sources are industrial sources and that determines BARCT sources. (Landfills are not part of the cap and trade, except for energy generation)
   d. BARCT: AB617 indicates a facility under C&T is required to implement BARCT. Unclear whether entire facility subject to BARCT. Going to have to do a BARCT analysis to figure out; will have to analyze and re-open rules that were not specifically designated as BARCT or do not meet BARCT.

3.2. Criteria Pollutants and Toxic Air Contaminants Reporting Regulation ("CTR")
   a. Emissions Reporting (Anny Huang and John Swanson): ARB visited 28 air districts to get feedback about new reporting requirements; plan to distribute

a draft of regulatory language or additional feedback in May and will have another public workshop

b. Elevated Prioritization Score: thresholds based on HRA and weighted toxicity scores; TARMAC requested the facility prioritization score, asked districts to provide by 4/23.

3.3. AB617 Implementation: Districts Action Plan: Districts provided the current status of AB617 implementation efforts related to community identification, emission reduction plans, emissions inventory and BARCT analysis.

Part 5 – District Topics of Discussion (3:15 pm – 5:30 pm)

5.1. Cannabis Related Activities: Districts provided current status of cannabis permitting processes, e.g., application received, outreach performed and other strategies.

5.2. BACT for Wine Fermentation Tank Status Report (*Mike Goldman):* Mike provided update on BACT and permitting process for fermentation tanks at winery. The Wine Institute appealed the permit. Region 9 considers the proposed controls as achieved in practice.

5.3. Wood Pyrolysis (Biochar and Energy Production) – *SJVAPCD*: using wood combustion and VOC factors to determine toxics factor; better than open burning wood waste. NOx considerations were discussed; some Districts will use landfill gas for emission factors. BAAQMD has a waste pyrolysis project at a pilot scale for municipal waste operation.

5.4. Public records request from NRDC regarding EPA policy "Once in always in" – *All.* Some Districts have received requests for information from NRDC, asking for information on toxics facilities.

TUESDAY, April 24, 2018 (8:30 am – 12:00 am)

Part 5 – District: Topics of Discussion (8:30 am – 9:30 am) – Cont'd

5.3. Hot Sports Analysis for District-wide Transportable Equipment Operated at Stationary Sources – *Brian Clements (SJVAPCD)*

a. SJVAPCD is reassessing all their facilities because of OEHHA changes to risk factors; they have prioritized their 14,000 facilities to do them in different phases.
b. Emergency generators: not an industry-wide source per Appendix E, but it would be advised to look at them as such
c. Dry cleaners: not in hot spots program any longer because solvent used is no longer considered toxic
d. Autobody: not much of a concern anymore because toxic metals being removed.
e. Other Districts presented various topics related to hot spots analysis

f. ARB looking for comments back about emission inventory guidance; Mike G. will send an email to CAPCOA group

5.4. Oil and Gas Operation, GHG State Regulation:
Implementation of State Regulation Status Update – *Arnaud and Group*
a. SJVAPCD: adopted two rules to implement registration program and new fees. Industry was in favor of District implementing rule. Three hundred registrations have been received so far. Registration program will allow them to keep NSR and GHG requirements separate. MOA signed with CARB
b. Butte: submitted plan and signed MOA with CARB.
c. Ventura: signed MOA with CARB
d. Yolo-Solano: signed MOA with CARB; registration program will begin in 2019
e. ARB will send grant application soon; SJVAPCD went through grant process already; applications need to be submitted by end of FY.

Part 6 – District Update / Issues: (9:30 - 10:15 am)

6.1. Power Plant Permitting Updates - *All*
6.2. New BACT Determinations and Unique Permitting Activities – *All*
a. YSAQMD: NY had a wet scrubber for a crematory undergo EPA source testing, but some concerns because there is not consistent way of removing metals
b. SDAPCD: discussed situation with a Navy contractor
c. SJVAPCD: proactively revisiting all BACT determinations. Based on multiple source testing results, boilers likely to have very low ppm level; will be presented by end of 2018
6.3. Enforcement Managers Meeting, August 20-21
a. Potential topics to be discussed at the next meeting: Cannabis Control system (Mike G), AB2588, AB617, waste diversion and composting, BCAQMD Oroville dam presentation, landfill methane presentation by ARB, winery tank update, TARMAC updates, and GDF/AST.
6.4. Symposium Planning – *Group*
a. Symposium planned for October 29-31 in Lake Natoma.
b. Topics: cannabis, AB617, O&G implementation, AB2588, pyrolysis, waste diversion and composting (Ben can ask their landfill manager to participate in October symposium), District updates. Day 1 will begin at 1:00pm at Lake Natoma

Part 7 – Committee Updates and Board Assignments: (10:30 am – 11:15 pm)

7.1. Enforcement Managers – *Juan Ortellado (BAAQMD)*: update provided on activities and topics being followed by the Enforcement Managers committee including vapor recovery, PERP Regulation updates, cannabis permitting and enforcement, oil and gas methane regulation, CARB's District support section, and EPA inspections.
7.2. Vapor Recovery
a. CARB Presentation - *George Lew (CARB)*: discussed different proposals for AST phase 2 program (see presentation). Reviewed current status of overpressure study results and next steps.

b. Vapor Recovery Sub-Committee - *William Thompson (SCAQMD)*: sub-committee has been working with CARB on the overpressure study and results, developing a Phase II AST proposal, and the meter mapping presentation by Veeder Root

7.3. TARMAC Sub-committee – *David Whitney (SLOAPCD)*: Alan Abbs is going to work with the subcommittee to determine what topics they need to focus on this summer.

Part 8 – Training: (11:15 am to 11:30 am)

8.1. CAPCOA/ARB Training – *Kerby*
8.2. Oil and Gas Training Class

Conclusion

Roundtable Discussion – *Open Floor*

- YSAQMD: discussed issues with heated pressure washers; most districts don't have an exemption. SMAQMD noted pressure washers fall under their rule for small boilers and water heaters, but hey apply only to natural gas and diesel-fired; certification is required.
- MBUAPCD: discussed engines operating at AT&T towers and the request to use a different engine for the same permit; Placer, Butte and Sacramento all mentioned they do flex permits to allow for different engines to be used under one permit as long as they meet certain specifications.
- Group discussion on flow rate testing at landfills, Method 19 vs. EPA method 2 using pitot tube; there can be a difference in CO2 reported; it was mentioned pitot tube testing is more prone to error and the group consensus was that Method 19 should be used.

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