



# ADMINISTRATION COMMITTEE

Headquarters  
18480 Bandilier Circle  
Fountain Valley, CA 92708  
(714) 593-7433

## Agenda Report

**File #:** 2025-4142

**Agenda Date:** 3/12/2025

**Agenda Item No:** 3.

**FROM:** Robert Thompson, General Manager  
Originator: Lan C. Wiborg, Director of Environmental Services

**SUBJECT:**

### CASA STATEWIDE POOLED EMISSIONS STUDY

### GENERAL MANAGER'S RECOMMENDATION

RECOMMENDATION: Recommend to the Board of Directors to:

- A. Approve the Memorandum of Agreement (MOA) between Orange County Sanitation District and California Association of Sanitation Agencies for CY 2025-2029 to complete the Statewide Wastewater Air Toxics Pooled Emissions Study (Study); and
- B. Approve funding for a total amount not to exceed \$800,000.

### BACKGROUND

As a Title V facility, Orange County Sanitation District (OC San) is subject to stringent reporting requirements for both criteria air pollutants and toxic air emissions. The California State Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) established a regulatory framework to track and assess emissions of over 400 toxic air contaminants across various facilities. In response, a Pooled Emissions Estimation Program study was developed by 25 wastewater agencies, including OC San, to identify and quantify air toxic emissions associated with wastewater treatment processes. The success of this study led SCAQMD to approve a shortlist of 20 toxic substances, which continues to serve as the basis for permitting assessments and compliance with AB 2588 reporting requirements.

In 2022, CARB updated the Emission Inventory Criteria and Guidelines (EICG) and the Reporting of Criteria Air Pollutants and Toxic Air Contaminants Regulations, expanding the scope of reportable air toxics to over 1,700 substances. To comply with these new requirements, wastewater agencies, including OC San, must complete a two-step emissions evaluation process by 2028:

- Step 1: Conduct an emissions scan across various wastewater treatment processes to identify detectable air toxic compounds; and
- Step 2: Quantify the detectable air toxic compounds identified in Step 1.

To enhance compliance across 114 wastewater agencies, CASA is coordinating a statewide Pooled Emissions Study (Study). This approach aims to eliminate the need for individual emission

assessments at each wastewater treatment facility, thereby reducing potential inconsistencies within the sector and financial burden to individual POTW.

## **RELEVANT STANDARDS**

- Ensure the public's money is wisely spent
- Comply with environmental permit requirements
- Maintain collaborative and cooperative relationships with regulators, stakeholders, and neighboring communities

## **PROBLEM**

Wastewater agencies are required to conduct a two-step process (on their own or as a group) to determine which of the 1,700+ air toxics referenced in the latest EICG need to be monitored and reported beginning in 2028. If OC San decides to independently perform the two-step process, OC San will be responsible for test plan development, source testing negotiations, project management, contractor procurement, and sampling and laboratory analyses of all 1700+ air toxics across the various treatment processes which is cost and resource prohibitive. In addition, independent efforts pose challenges for the wastewater community due to the variability across source testing service providers and laboratories, which would make it difficult to determine a consistent emission factor for each air toxic.

## **PROPOSED SOLUTION**

Approve the MOA and funding with CASA for OC San to participate in the Study.

## **TIMING CONCERNS**

An approved MOA is needed to authorize participation in the Study. CASA has commenced preliminary activities focusing on the recruitment of a project manager and source test protocol development.

## **RAMIFICATIONS OF NOT TAKING ACTION**

If the MOA is not approved, OC San would have to independently perform the two-step process for the 1700+ air toxics identified by CARB. That approach poses significant challenges with limited resource allocations and increased costs for OC San. Should OC San complete the two-step emissions evaluation process independent of the CASA Study project costs are estimated to exceed \$3M. Under this scenario OC San will be responsible for test plan development, source testing negotiations, project management, contractor procurement, and sampling and laboratory analyses of all air toxics across the various treatment process.

## **PRIOR COMMITTEE/BOARD ACTIONS**

N/A

## **ADDITIONAL INFORMATION**

CASA anticipates the total budget of the Study to be roughly \$10,000,000 to be shared by 114 wastewater agencies in California. Preliminary wastewater agency contributions are calculated based on \$3,700 per MGD of average annual daily flows from CY 2019-2021. As one of the largest wastewater agencies in California, OC San's contribution is projected not to exceed \$800,000.

The proposed statewide approach offers numerous benefits, including:

- Estimated cost savings to OC San of over \$2.2M through representative testing at select wastewater agencies (plus management and overhead);
- Streamlined project execution producing a sound technical approach and consistency across California;
- Coordinated statewide action between wastewater sector and regulators to successfully complete the Study; and
- Production of a single set of emissions factors for a shortlist of air toxics that the wastewater sector can use for reporting beginning in 2028.

## **CEQA**

N/A

## **FINANCIAL CONSIDERATIONS**

This request complies with authority levels of the OC San Purchasing Ordinance. This item has been budgeted (Budget FY 2024-25 and 2025-26, Section 6, Page 64, Research & Monitoring) and the budget is sufficient for the recommended action.

## **ATTACHMENT**

*The following attachment(s) may be viewed on-line at the OC San website ([www.ocsan.gov](http://www.ocsan.gov)) with the complete agenda package:*

- Memorandum of Agreement