



California Air/Climate Regulatory Update

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New Air Toxics Reporting Requirements for Stationary Sources

Why? CARB regulations require it!

- Criteria Air Pollutant & Toxic Air Contaminant Reporting Regulation (CTR)
- Emissions Inventory Criteria & Guidelines (EICG)

Who? Over 110 unique agencies!

- ≥ 5 MGD*, uncovered primaries
- ≥ 10 MGD*, covered primaries

*average annual daily flow

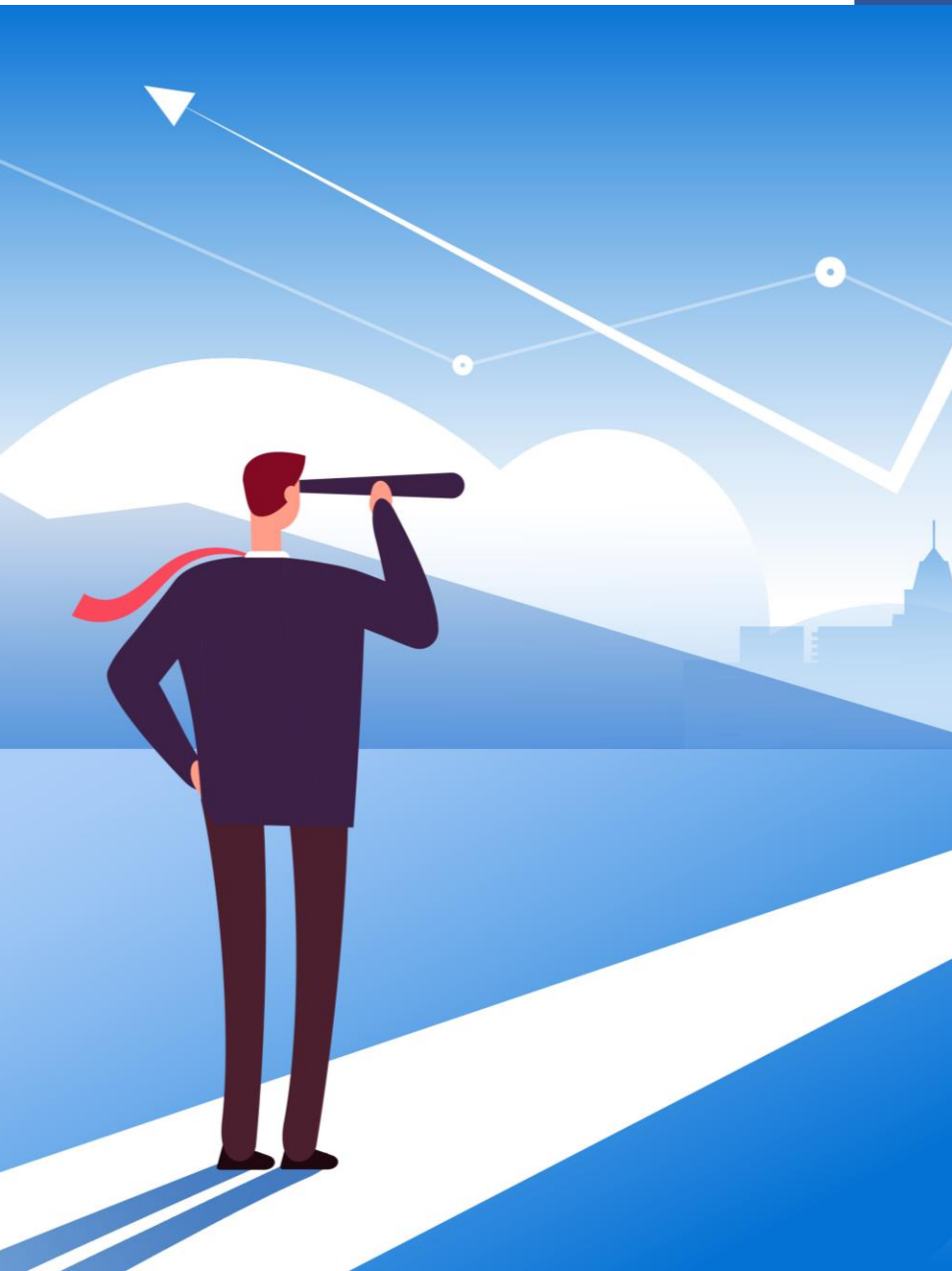
How do WWTPs comply with CARB's CTR/EICG?

- WWTPs are required to perform a “two-step process” either individually or as a statewide group to determine what compounds are being emitted and how much
- The “two-step process” consists of:
 1. Qualitative scan of air samples from unit processes to determine detectable compounds
 2. Quantifying emissions of detectable compounds to determine emission factors/potential risk
- Source testing is ~\$250,000-300,000 per unit process
- Multiple unit processes must be tested → too costly, not enough source test specialists if every WWTP performs the “two-step process” on their own
- Wastewater sector is performing the “two-step process” as a statewide group
- Your agency must check applicability – if exceed flow threshold, then pledge participation/make flow-based contribution to statewide group to be compliant
- Report business-as-usual through 2027 or until “two-step process” is complete

The statewide wastewater group is performing the two-step process in two phases:

1. **Phase 1 (2024-2026):** Project Manager is working in close collaboration with the Wastewater Steering Committee, as well as CARB and CAPCOA/Air Districts, to develop a Plan for performing the Two-Step Process.  **We Are Here!**
2. **Phase 2 (2026-2027?):** PM and Source Test Specialists to **perform the Two-Step Process** in close collaboration with CARB, CAPCOA/air districts, the Wastewater Steering Committee, and participating WWTPs.

Outcome: Shortlist of relevant compounds and emission factors for use in complying with reporting requirements and assessing air permits going forward.



What's next?

- If you're not already participating in the statewide wastewater group, check if your agency is compliant!
Reach out to Debbie Mackey and CASA – Shacara Gamboa (sgamboa@casaweb.org) and Sarah Deslauriers (sdeslauriers@casaweb.org)
- Join CASA's Air Toxics Subgroup for updates – next meeting: October 8th, 2-3 pm (held second Wednesday of each month)

What federal activities are impacting CARB's vehicle emissions regulations?

- In June, the President signed 3 resolutions disapproving of CARB's:
 - Heavy-Duty Omnibus Low NOx Reg
 - Advanced Clean Cars II Reg
 - Advanced Clean Trucks Reg
- **Governor Newsom filed lawsuit, CARB continues enforcement**
- Since August, EPA Administrator (Lee Zeldin) proposed rescinding:
 - GHG Endangerment Finding
 - GHG Standards for Heavy-Duty Vehicles
 - Clean Power Plan
- **No final decisions, still in comment period**

CARB is considering alternatives as they amend ACF, including revisiting renewable natural gas!

- CARB maintains they can still enforce Advanced Clean Fleets (ACF) Regulation on State & Local Government Agencies (SLGA) as purchasers
- BUT, SLGA medium-/heavy-duty fleets represent only 7% of total, which means:
 - Not enough demand for ZEVs to influence manufacturers, infrastructure implementation
 - CARB environmental and economic analyses are no longer valid (without private fleets)
- ACF Regulation is currently being amended (through summer 2026)
- In response to federal pushback, CARB Board called for more flexibility – for example, modifying the NZEV definition and evaluating the role of RNG
- CASA is asking for Near-ZEV definition to include RNG-fueled vehicles, no sunset – to create market certainty for biogas AND provide resilient vehicle options!

SWRCB is drafting a NEW Climate Change Resolution & Action Plan

- CASA is 1 of 9 stakeholders serving as a Focus Group supporting development of a new Climate Change Resolution & Action Plan
- Draft Resolution to be shared this fall (2025) for our review and feedback prior to public release and Board adoption
- Development of Action Plan to follow, expected in 2026

Legislation: What Do We Expect in 2026?

- In 2025, SB 318 (Becker) was introduced seeking an update to the definition of “BARCT” in South Coast Air Basin, however...
- SB 318 was amended multiple times in effort to centralize air regulations under CARB, giving them:
 - Final review of Title V permits
 - A role in updating/leading the precertification program
 - Authority to periodically update BACT/BARCT
- Many groups in strong opposition (e.g., CCEEB, CAPCOA/Air Districts, truck manufacturers, and others)
- Held in appropriations, to return in 2026!

Questions

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