



California Association of Sanitation Agencies

Advanced Clean Fleets Regulation & Air Toxics Emissions Reporting

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Advanced Clean Fleet Regulation

This section reflects our latest understanding of the regulatory amendments and impacts to public agency fleet management and resilience.

CARB's Advanced Clean Fleets (ACF) Regulatory Requirements and Amendments

1

State and Local Government Agencies required to transition medium- and heavy-duty vehicles (>8,500 lbs GVWR) to zero-emission vehicles (ZEVs)

However, most vehicle types are not available as ZEVs.

2

AB 1594 required ACF be amended to improve public agency access to exemptions to ensure reliable services in emergencies

Removes vehicle age requirement for exemptions, extends 50% ZEV requirement through 2030 (vs 2027).

3

Two issues remain – handling of contracted privately-owned vehicles and use of wastewater biogas as a low carbon transportation fuel in absence of ZEVs

CARB originally excluded most contracted vehicles from ACF compliance; use of biogas as a low carbon fuel in a low NOx ICE engine was introduced but is not available to all.

Next steps to complete ACF regulatory amendment process

- Office of Administrative Law (OAL) must approve ACF Amendments/ Final Statement of Reasons (FSOR) by September 11th
- Amendments become effective January 1, 2027

CASA's steps following the ACF regulatory amendment process

CASA to continue working with CARB to clarify...

- Contracts with private vehicles:
 - FSOR says when a public agency "dispatches" a contracted vehicle, only then must it comply with ACF (original interpretation)
 - However, regulatory definitions of "fleet" and "fleet owner" include vehicles under contract and rentals and leases of 1+ years, creates ambiguity
 - Hiring Compliant Fleets section implies public agencies hire other public agencies; need to "clean up" language in future
- Impacts to SB 1383 implementation, ozone attainment, and WWTP resource recovery/resilience:
 - FSOR allows wastewater agencies that receive/process diverted organic waste to use biogas as a low carbon transportation fuel
 - Access to Captive Biofuel Use Exemption / low NOx engines is only available to public agencies registered under the Milestones Option

Resources made available by CARB to support ACF compliance and implementation

1

Drive Forward Truck Forums

Industry professionals and practitioners presenting on Outreach and Infrastructure Implementation.

[Click Here to join!](#)

2

Funding Finder Tool

Tool designed to search and filter for medium- and heavy-duty advanced-technology vehicle and infrastructure programs.

[Click Here to search!](#)

3

Clean Transportation Incentives Workshops & Meetings

Workshops and meetings on Low Carbon Transportation Incentives / Air Quality Improvement Program to facilitate information sharing.

[Click Here to register!](#)

CASA's Advanced Clean Vehicle Subgroup is drafting an ACF compliance guidance document!

Next Subgroup meeting: September 28th, 2-3 pm



Air Toxics Emissions Reporting

This section provides an overview of the updated regulatory and reporting requirements and how the wastewater sector is working as a statewide group to comply while leveraging resources.

New air toxics reporting requirements for stationary sources (adopted 2019, effective 2020)

Why? CARB regulations require it!

- Criteria Air Pollutant & Toxic Air Contaminant Reporting (CTR) Regulation
- 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 updated CTR/EICG?

- *WWTPs must perform “two-step process” individually OR as a statewide group*
- *“Two-Step Process” determines which air toxics are emitted and how much:*
 - *Qualitative scan of unit processes to determine detectable compounds*
 - *Quantify emissions to determine emission factors and potential risk*
- *Source testing is estimated at \$250,000-300,000 per unit process*
- *Multiple unit processes must be tested at each WWTP → costly, not enough resources (source testing specialists, labs)*
- *Wastewater sector is performing the “two-step process” as a statewide group, led by a Steering Committee*
- ***Check applicability (see previous slide) – if applicable, pledge participation/make flow-based contribution to statewide group***
- *Report air toxics business-as-usual through 2027 OR until the “two-step process” is complete!*

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

Phase 1 (2024-Present Day)

- Wastewater Steering Committee is working with a Project Manager to develop a Plan for performing the Two-Step Process for CAPCOA/air districts and CARB to review and approve.
 - CAPCOA/Air Districts reviewing Plan now!
 - Next Step: CARB to review and approve.

Phase 2 (2027+)

- Wastewater Steering Committee to work with a Project Manager, Source Test Specialists, Analytical Labs, and wastewater experts to perform the Two-Step Process in collaboration with WWTPs, CAPCOA/air districts, and CARB.
 - 24+ month duration, 6+ facilities

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

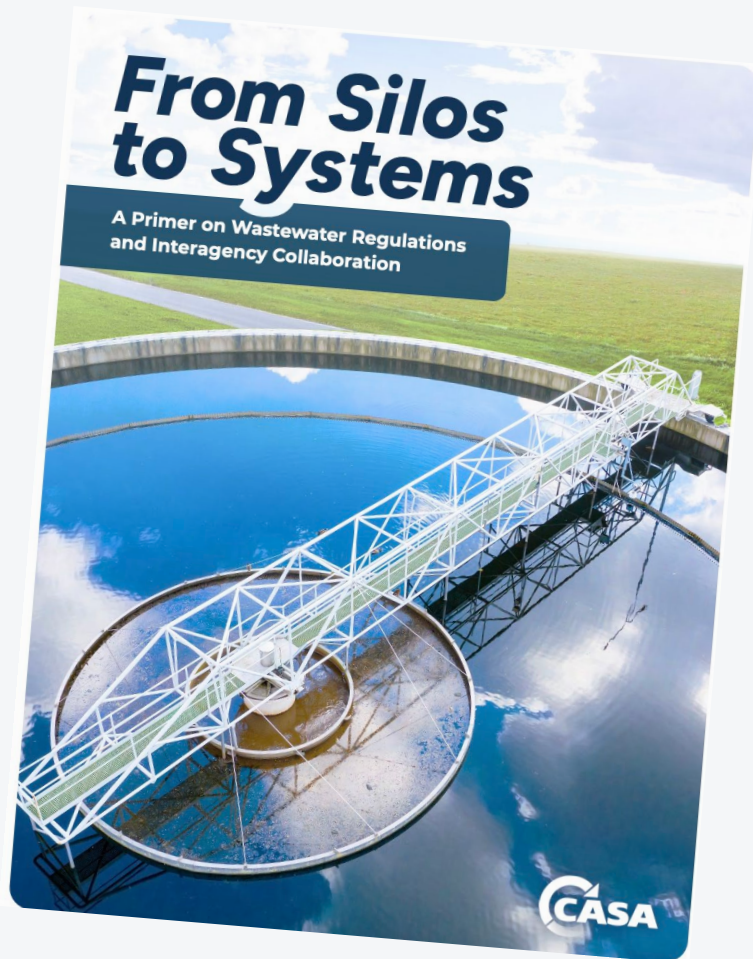
What's next?

- *If you're not already participating in the statewide wastewater group, **check your applicability!***
- ***Reach out to CASA with any questions –**
Shacara Peixoto (speixoto@casaweb.org) and
Sarah Deslauriers (sdeslauriers@casaweb.org)*
- ***Join CASA's Air Toxics Subgroup** for monthly updates and
discuss any questions with the Steering Committee
Next Subgroup meeting: October 7th, 2-3 pm*

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*We can't solve problems
by using the same kind of
thinking we used when we
created them.*

— Albert Einstein





Thank You

Questions, feedback, or interested in getting involved?
We'd love to hear from you.

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