



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

BOARD OF DIRECTORS  
STATIONARY SOURCE COMMITTEE

COMMITTEE MEMBERS

ROD SINKS - CHAIR  
JOHN BAUTERS  
JOHN GIOIA  
NATE MILEY  
JIM SPERING  
LORI WILSON

KAREN MITCHOFF – VICE CHAIR  
DAVID CANEPA  
CAROLE GROOM  
MARK ROSS  
BRAD WAGENKNECHT

MONDAY  
DECEMBER 16, 2019  
9:30 A.M.

1<sup>ST</sup> FLOOR BOARD ROOM  
375 BEALE STREET  
SAN FRANCISCO, CA 94105

AGENDA

1. **CALL TO ORDER - ROLL CALL**  
**PLEDGE OF ALLEGIANCE**  
**PUBLIC MEETING PROCEDURE**

*The Committee Chair shall call the meeting to order and the Clerk of the Boards shall take roll of the Committee members. The Committee Chair shall lead the Pledge of Allegiance.*

*This meeting will be webcast. To see the webcast, please visit [www.baaqmd.gov/bodagendas](http://www.baaqmd.gov/bodagendas) at the time of the meeting. Closed captioning may contain errors and omissions, and are not certified for their content or form.*

**Public Comment on Agenda Items** *The public may comment on each item on the agenda as the item is taken up. Public Comment Cards for items on the agenda must be submitted in person to the Clerk of the Boards at the location of the meeting and prior to the Board taking up the particular item. Where an item was moved from the Consent Calendar to an Action item, no speaker who has already spoken on that item will be entitled to speak to that item again.*

2. **PUBLIC COMMENT ON NON-AGENDA MATTERS**

**Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3** *For the first round of public comment on non-agenda matters at the beginning of the agenda, ten persons selected by a drawing by the Clerk of the Boards from among the Public Comment Cards indicating they wish to speak on matters not on the agenda for the meeting will have two minutes each to address the Board on matters not on the agenda. For this first round of public comments on non-agenda matters, all Public Comment Cards must be submitted in person to the Clerk of the Board at the location of the meeting and prior to commencement of the meeting.*

Staff/Phone (415) 749-

3. **APPROVAL OF THE MINUTES OF SEPTEMBER 16, 2019**

Clerk of the Boards/5073

*The Committee will consider approving the draft minutes of the Stationary Source Committee Special meeting of September 16, 2019.*

4. **UPDATE ON THE IMPLEMENTATION OF REGULATION 11, RULE 18 (RULE 11-18): REDUCTION OF RISK FROM AIR TOXIC EMISSIONS AT EXISTING FACILITIES**

J. Broadbent/5052

[jbroadbent@baaqmd.gov](mailto:jbroadbent@baaqmd.gov)

*The Committee will receive an update of the Air District's implementation of Regulation 11, Rule 18 (Rule 11-18): Reduction of Risk from Air Toxic Emissions at Existing Facilities, including a review of the rule requirements and a discussion of the implementation status for Phase I facilities.*

5. **ODOR ATTRIBUTION STUDY IN THE SOUTH BAY**

J. Broadbent/5052

[jbroadbent@baaqmd.gov](mailto:jbroadbent@baaqmd.gov)

*The Committee will receive an update on the Odor Attribution Study in the South Bay.*

6. **PUBLIC COMMENT ON NON-AGENDA MATTERS**

*Speakers who did not have the opportunity to address the Board in the first round of comments on non-agenda matters will be allowed two minutes each to address the Board on non-agenda matters.*

7. **COMMITTEE MEMBER COMMENTS**

*Any member of the Committee, or its staff, on his or her own initiative or in response to questions posed by the public, may: ask a question for clarification, make a brief announcement or report on his or her own activities, provide a reference to staff regarding factual information, request staff to report back at a subsequent meeting concerning any matter or take action to direct staff to place a matter of business on a future agenda. (Gov't Code § 54954.2)*

8. **TIME AND PLACE OF NEXT MEETING**

*At the call of the Chair.*

9. **ADJOURNMENT**

*The Committee meeting shall be adjourned by the Committee Chair.*

## **CONTACT:**

**MANAGER, EXECUTIVE OPERATIONS**  
**375 BEALE STREET, SAN FRANCISCO, CA 94105**

[vjohnson@baaqmd.gov](mailto:vjohnson@baaqmd.gov)

**(415) 749-4941**  
**FAX: (415) 928-8560**  
**BAAQMD homepage:**  
[www.baaqmd.gov](http://www.baaqmd.gov)

- To submit written comments on an agenda item in advance of the meeting. Please note that all correspondence must be addressed to the “Stationary Source Committee” and received at least 24 hours prior, excluding weekends and holidays, in order to be presented at that Board meeting. Any correspondence received after that time will be presented to the Board at the following meeting.
- To request, in advance of the meeting, to be placed on the list to testify on an agenda item.
- Any writing relating to an open session item on this Agenda that is distributed to all, or a majority of all, members of the body to which this Agenda relates shall be made available at the District’s offices at 375 Beale Street, Suite 600, San Francisco, CA 94105, at the time such writing is made available to all, or a majority of all, members of that body.

### **Accessibility and Non-Discrimination Policy**

The Bay Area Air Quality Management District (Air District) does not discriminate on the basis of race, national origin, ethnic group identification, ancestry, religion, age, sex, sexual orientation, gender identity, gender expression, color, genetic information, medical condition, or mental or physical disability, or any other attribute or belief protected by law.

It is the Air District’s policy to provide fair and equal access to the benefits of a program or activity administered by Air District. The Air District will not tolerate discrimination against any person(s) seeking to participate in, or receive the benefits of, any program or activity offered or conducted by the Air District. Members of the public who believe they or others were unlawfully denied full and equal access to an Air District program or activity may file a discrimination complaint under this policy. This non-discrimination policy also applies to other people or entities affiliated with Air District, including contractors or grantees that the Air District utilizes to provide benefits and services to members of the public.

Auxiliary aids and services including, for example, qualified interpreters and/or listening devices, to individuals who are deaf or hard of hearing, and to other individuals as necessary to ensure effective communication or an equal opportunity to participate fully in the benefits, activities, programs and services will be provided by the Air District in a timely manner and in such a way as to protect the privacy and independence of the individual. Please contact the Non-Discrimination Coordinator identified below at least three days in advance of a meeting so that arrangements can be made accordingly.

If you believe discrimination has occurred with respect to an Air District program or activity, you may contact the Non-Discrimination Coordinator identified below or visit our website at [www.baaqmd.gov/accessibility](http://www.baaqmd.gov/accessibility) to learn how and where to file a complaint of discrimination.

Questions regarding this Policy should be directed to the Air District’s Non-Discrimination Coordinator, Rex Sanders, at (415) 749-4951 or by email at [rsanders@baaqmd.gov](mailto:rsanders@baaqmd.gov).

# BAY AREA AIR QUALITY MANAGEMENT DISTRICT

375 BEALE STREET, SAN FRANCISCO, CA 94105

FOR QUESTIONS PLEASE CALL (415) 749-4941

## EXECUTIVE OFFICE:

## MONTHLY CALENDAR OF AIR DISTRICT MEETINGS

### DECEMBER 2019

<u>TYPE OF MEETING</u>	<u>DAY</u>	<u>DATE</u>	<u>TIME</u>	<u>ROOM</u>
Board of Directors Stationary Source Committee	Monday	16	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Executive Committee - CANCELLED	Wednesday	18	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Mobile Source Committee	Wednesday	18	9:30 a.m.	1 <sup>st</sup> Floor Yerba Buena Room
Board of Directors Budget & Finance Committee - CANCELLED	Wednesday	25	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Mobile Source Committee – CANCELLED AND RESCHEDULED TO WEDNESDAY, DECEMBER 18, 2019	Thursday	26	9:30 a.m.	1 <sup>st</sup> Floor Board Room

### JANUARY 2020

<u>TYPE OF MEETING</u>	<u>DAY</u>	<u>DATE</u>	<u>TIME</u>	<u>ROOM</u>
Board of Directors Regular Meeting - CANCELLED	Wednesday	1	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Special Meeting/Retreat -CANCELLED AND RESCHEDULED TO WEDNESDAY, JANUARY 29, 2019	Wednesday	15	10:00 a.m.	Residence Inn by Marriott San Jose/Cupertino 19429 Stevens Creek Blvd., Montebello Room Cupertino, CA 95014
Board of Directors Climate Protection Committee - CANCELLED	Thursday	16	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Stationary Source Committee - CANCELLED	Monday	20	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Budget & Finance Committee - CANCELLED	Wednesday	22	9:30 a.m.	1 <sup>st</sup> Floor Board Room

# JANUARY 2020

<u>TYPE OF MEETING</u>	<u>DAY</u>	<u>DATE</u>	<u>TIME</u>	<u>ROOM</u>
Board of Directors Legislative Committee - CANCELLED	Wednesday	22	10:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Mobile Source Committee - CANCELLED	Thursday	23	9:30 a.m.	1 <sup>st</sup> Floor Yerba Buena Room
Board of Directors Special Meeting/Retreat	Wednesday	29	10:00 a.m.	Residence Inn by Marriott San Jose/Cupertino 19429 Stevens Creek Blvd., Montebello Room Cupertino, CA 95014

ADG – 12/10/2019 – 8:45 AM

G/Board/Executive Office/Moncal

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

Memorandum

To: Chairperson Rod Sinks and Members  
of the Stationary Source Committee

From: Jack P. Broadbent  
Executive Officer/APCO

Date: December 3, 2019

Re: Approval of the Minutes of September 16, 2019

---

RECOMMENDED ACTION

Approve the attached draft minutes of the Stationary Source Committee (Committee) Special meeting of September 16, 2019.

DISCUSSION

Attached for your review and approval are the draft minutes of the Committee meeting of September 16, 2019.

Respectfully submitted,

Jack P. Broadbent  
Executive Officer/APCO

Prepared by: Marcy Hiratzka  
Reviewed by: Vanessa Johnson

Attachment 3A: Draft Minutes of the Committee Special Meeting of September 16, 2019

## AGENDA: 3A – ATTACHMENT

Draft Minutes – Stationary Source Committee Special Meeting of September 16, 2019

Bay Area Air Quality Management District  
Milpitas City Hall, Council Chambers  
455 E. Calaveras Blvd.  
Milpitas, CA 95035  
(415) 749-5073

### DRAFT MINUTES

Summary of Board of Directors  
Stationary Source Committee Special Meeting  
Monday, September 16, 2019

#### 1. CALL TO ORDER – ROLL CALL

Stationary Source Committee (Committee) Chairperson Rod Sinks called the meeting to order at 10:23 a.m.

Present: Committee Chairperson Rod Sinks; Vice Chairperson Karen Mitchoff; and Directors John J. Bauters, John Gioia, Carole Groom, Jim Spering, and Brad Wagenknecht.

Absent: Directors David Canepa, Nate Miley, and Mark Ross.

Also Present: None.

#### PUBLIC COMMENT ON NON-AGENDA MATTERS

#### 2. Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3

Public comments were given by Tom Pyke, Office of Congressman Ro Khanna; and Jeremy Loh, Town of Los Altos Hills.

NOTED PRESENT: Director Spering was noted present at 10:27 a.m.

#### 3. APPROVAL OF THE MINUTES OF JULY 8, 2019

##### Public Comments

No requests received.

##### Committee Comments

None.



Committee Action

Vice Chair Mitchoff made a motion, seconded by Director Spering, to approve the Minutes of July 8, 2019; and the motion carried by the following vote of the Committee:

AYES: Gioia, Groom, Mitchoff, Sinks, Spering.  
NOES: None.  
ABSTAIN: None.  
ABSENT: Bauters, Canepa, Miley, Ross, Wagenknecht.

**4. UPDATE ON SOUTH BAY ODOR SOURCES AND AIR DISTRICT ODOR ATTRIBUTION STUDY**

Wayne Kino, Deputy Air Pollution Control Officer of Operations, introduced Tracy Lee, Compliance and Enforcement Manager, and Jerry Bovee, Air Quality Engineering Manager, who gave the staff presentation *South Bay Odor Update and Air District Odor Attribution Study*, including: overview; summary of odor complaints (2013-2019 and 2018-2019); area overview; area sources; South Bay Odor Stakeholder Group; Air District Odor Attribution Study; International Disposal Corporation of California on Newby Island; Newby Island landfill, compost operation, and material recovery facility; Zero Waste Energy Development; San Jose-Santa Clara Regional Wastewater Facility; challenges in determining sources of odors; Odor Attribution Study goals, process, and next steps; and other actions.

NOTED PRESENT: Director Bauters was noted present at 10:36 a.m.

Public Comments

Public comments were given by Anurag Pal, Office of Assemblyman Kansen Chu; Henry Song, San Jose resident; Ling Kong, Milpitas resident; Keng Ng, Milpitas resident; Mayank Patel, Milpitas resident; Gia Tran, Milpitas resident; Fa Yoeu, Milpitas resident; Abhijit Basu, Fremont resident; Vicki Young, Milpitas resident; Michael Tsai, Milpitas resident; You-Wen Yi, Milpitas resident; and Sara Olsen, Milpitas resident.

Committee Comments

The Committee and staff discussed the projected date of completion of the study; how effective public complaints to the Air District are in yielding changes in the behaviors of those facilities or homes that are emission sources; how long garbage accumulates at the Newby Island Material Recovery Facility before it is processed; the request for an update on how this facility is being improved; the suggestion that a new modern facility be created to efficiently mitigate odors in the South Bay; whether haulers/operators will be part of the solution to mitigating odors; the anticipated process by which costs will be distributed when solutions are proposed at the conclusion of the study; the disadvantages of studying something for too long, thereby, prolonging action; short-term solutions that can be implemented in the near future; whether the Air District comments on Environmental Impact Reports regarding the expansion of these facilities; the suggestion that the Air District installs real-time video surveillance at the facilities; whether identifying signatures/tracers for each facility will be accomplished through this study; the clarification that the local enforcement agency (LEA) of these facilities, (employees of) the City

of San Jose, acts as an independent agency that reports to CalRecycle, and is not influenced by the San Jose City Council; the fact that air districts may not issue Notice of Violations to composting operations for odors (only for emissions); and who the permitting agencies are for these facilities.

NOTED PRESENT: Director Wagenknecht was noted present at 10:51 a.m.

Committee Action

None; receive and file.

**5. UPDATE ON IMPLEMENTATION OF NEW REGULATION 6 RULES**

Mr. Kino introduced Eliza Kane, Air Quality Specialist, who gave the staff presentation *Particulate Matter (PM) Rules Implementation Update*, including: outline; PM basics; PM health impacts; sources of PM<sub>10</sub> and PM<sub>2.5</sub>; Air District Regulation 6, Rule 1 amendment: Bulk Material Handling; examples of bulk material dust; bulk material dust controls; new Regulation 6, Rule 6; Prohibition of Trackout; examples of road dust – trackout; trackout controls; and best practices to reduce PM.

Public Comments

No requests received.

Committee Comments

The Committee and staff discussed whether reclaimed water is prohibited from being used in mist systems, and the suggestion for an Air District regulation that requires reclaimed water be used in mist systems; whether public facilities are exempt from Air District Regulation 6, Rule 6 (PM: Prohibition of Trackout), and the fact that this rule was implemented in August 2018; the request for an update on dust control measures for Interstate-680/Interstate-4 interchange project (overseen by the State of California Department of Transportation in cooperation with the Contra Costa Transportation Authority); the cost of high-efficiency sweepers and mist systems and whether the Air District can provide grants for these to small companies; and whether affected facilities know of changes to Regulation 6.

Committee Action

None; receive and file.

**6. UPDATE ON PROPOSED REGULATION 13, RULE 2 (RULE 13-2): ORGANIC MATERIAL HANDLING AND DRAFT REGULATION 13, RULE 3 (RULE 13-3): COMPOSTING OPERATIONS**

Gregory Nudd, Deputy Air Pollution Control Officer of Policy, introduced Misha Nishiki, Assistant Counsel, who gave the staff presentation *Update on Organic Material Handling and Composting Rules*, including: agenda; rule drivers; overview of workshop draft; stakeholder comments; proposed revisions; and tentative schedule.

Public Comments

Public comments were given by Eric Zetz, City of Sunnyvale; Tom Del Conte, Vision Recycling; Peter MacDonald, Pleasanton Garbage Service; Kelly Schoonmaker, Stop Waste; Neil Edgar, California Compost Coalition; Will Bahzc, North Bay Compost Coalition; and Dan Noble, Association of Compost Producers.

Committee Comments

The Committee and staff discussed how Air District staff took comments from compost facilities, material recovery and transfer station operators, and industry advocacy groups under consideration and therefore bifurcated Proposed Rule 13-2 into two draft rules: Rule 13-2: Organic Material Handling and Rule 13-3: Composting Operations; whether the proposed emission control provisions for these facilities were devised by the Air District or CalRecycle; whether Regulation 3, Rules 2 and 3 would be duplicated in other air districts in California; the anticipated rule adoption schedule; whether the Air District has gathered data from other air districts, and if so, whether they have indicated a preference for enclosed material recovery facilities; how the unknown costs of additional labor and equipment are concerning to material recovery companies; the level and frequency of Air District interaction with material recovery companies; whether a cost-benefit analysis of the proposed regulations will be conducted, and the observation that it seems as if a significant economic burden will be imposed upon the material recovery industry, should these regulations be adopted; the suggestion that facilities that show no measurable improvement with the implementation of the proposed regulations receive more leniency; whether this rule development would benefit from Air District championing legislative action; whether the proposed regulation pertains to odors; the hope that this proposed regulation would be applied to the entire Bay Area, and not solely focus on the South Bay; and the fact the general waste input stream is too great for the currently-existing infrastructure to process efficiently.

Committee Action

None; receive and file.

**PUBLIC COMMENT ON NON-AGENDA MATTERS**

**7. Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3**

No requests received.

**8. COMMITTEE MEMBER COMMENTS**

None.

**9. TIME AND PLACE OF NEXT MEETING**

Monday, December 16, 2019, Bay Area Air Quality Management District Office, 375 Beale Street, San Francisco, California 94105 at 9:30 a.m.

**10. ADJOURNMENT**

The meeting adjourned at 1:12 p.m.

Marcy Hirtzka  
Clerk of the Boards

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

Memorandum

To: Chairperson Rod Sinks and Members  
of the Stationary Source Committee

From: Jack P. Broadbent  
Executive Officer/APCO

Date: December 3, 2019

Re: Update on the Implementation of Regulation 11, Rule 18 (Rule 11-18): Reduction of Risk from Air Toxic Emissions at Existing Facilities

**RECOMMENDED ACTION**

None; receive and file.

**BACKGROUND**

The Bay Area Air Quality Management District (Air District) adopted Rule 11-18, Reduction of Risk from Air Toxic Emissions at Existing Facilities on November 15, 2017. As part of its implementation, the Air District uses air dispersion modeling and the latest science from the Office of Environmental Health Hazard Assessment (OEHHA) to evaluate health risks to communities from permitted facilities.

If a health risk exceeds a Rule 11-18 risk action level, the facility will be required to either:

- (A) Reduce all health risks below the final risk action levels; or
- (B) Install best available retrofit control technology for toxics (TBARCT) on all significant sources.

The final risk action levels are a cancer risk of 10 in a million, chronic hazard index of 1.0, and acute hazard index of 1.0.

The Rule 11-18 Implementation Steps are: (1) screen facilities, (2) validate data, (3) conduct health risk assessment (HRA), (4) approve risk reduction plans (RRP), and (5) implement risk reduction measures. The public will have the opportunity to comment on the draft HRA and the draft RRP before these reports are finalized.

## DISCUSSION

### Process and Timeline

As described in the Rule 11-18 Implementation Procedures, the Air District uses prioritization scores to screen and classify sites as high priority, low priority, or exempt. High priority sites are further separated into two phases (Phase I or Phase II). High priority facilities with the highest potential for health risks are in Phase I. Phase II includes all other non-exempt high priority facilities. The Air District conducted the initial screening assessment in June 2018. After initial inventory corrections, the Air District identified 35 Phase I facilities and about 300 Phase II facilities. A new screening assessment is underway, and the Air District has identified one additional Phase I facility. The number of Phase II facilities remains about 300.

The Air District has completed the preliminary HRA for one facility. Preliminary results indicate that health risks from this site exceed the Rule 11-18 risk action levels (RALs) and that a risk reduction plan (RRP) will be required. The preliminary HRA report has been sent to the facility for the required 90-day review period. The Air District expects to post this HRA for public comment in March 2020.

HRAs are underway for three additional sites. Staff meets on a weekly basis to review progress on the data validation process for the remaining 31 sites. The data request for the new Phase I site is being prepared and will be sent to the facility before the end of the year. For the refineries, staff are currently validating stack parameter data and 1-hour emission inventories. The annual emission inventories are being validated through the Rule 12-15 process. The HRAs for the refineries will begin after completion of the heavy liquids study and the related emission inventory updates.

Overall, staff expects to require HRAs for about 30 of the Phase I sites. Most of the Phase I HRAs will be published by the end of 2020.

### Actions to Date

To implement the rule, the Air District convened a Rule 11-18 Implementation Workgroup to ensure transparency, provide industry and community perspectives, and facilitate communication with affected communities during the implementation of Rule 11-18. This workgroup includes representatives from environmental and health organizations, industry groups, refineries, and Air District staff. The workgroup has had four meetings to date. Recent discussion topics include: guidance documents, one-hour emission inventories, context for HRA reports, and public noticing plans. The Air District is currently reviewing workgroup comments on guidance documents and expects to post these guidance documents to the web site soon.

The implementation of Rule 11-18 has led to several infrastructure improvements. The Air District developed a new data management process for high priority facilities that will increase accuracy of annual toxic air contaminant (TAC) emission inventories, add new one-hour TAC emission inventories, and collect all necessary input data for comprehensive HRAs. This process provides regulated facilities with the information needed to understand the basis for their current Air District emission inventory; to identify potentially significant emissions; to easily request corrections to inaccurate data; to provide missing data; and allows for data improvement and validation by Air District staff. The Air District has also updated our fee structure in Regulation 3 to meet cost recovery goals for the staff time needed to improve TAC inventories, conduct or review HRAs, and approve RRP. In addition, staff updated the Air District website by reorganizing page locations, consolidating documents, and adding new information related to Rule 11-18 implementation.

BUDGET CONSIDERATION/FINANCIAL IMPACT

None.

Respectfully submitted

Jack P. Broadbent  
Executive Officer/APCO

Prepared by: Carol Allen  
Reviewed by: Sanjeev Kamboj, Pamela Leong, and Damian Breen

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

## Memorandum

To: Chairperson Rod Sinks and Members  
of the Stationary Source Committee

From: Jack P. Broadbent  
Executive Officer/APCO

Date: December 3, 2019

Re: Odor Attribution Study in the South Bay

---

**RECOMMENDED ACTION**

None; receive and file.

**BACKGROUND**

Communities in and around Milpitas, near a cluster of waste handling facilities, have experienced air quality and odor issues for many years. These facilities include the Newby Island Landfill and associated composting facility, operated by Republic Services; the San Jose-Santa Clara Regional Wastewater Facility, operated by the City of San Jose; and a dry anaerobic food waste digestion facility, operated by ZeroWaste Energy Development Company. There have been improvements to air quality in Milpitas due to Air District actions with assistance from the community. However, odors continue to be a concern.

The South Bay Odor Stakeholder Group (SBOSG) was formed in 2015 to provide a transparent forum to address odors that affect the Milpitas community and discuss enforcement activities, permit and regulatory requirements, and odor mitigation and controls measures. Quarterly meetings are attended by community and industry stakeholders; Air District staff; staff representing the Cities of Fremont, Milpitas, and San Jose; staff representing Assemblymember Kansen Chu, Congressman Ro Khanna, and Senator Bob Wieckowski; and Rod Sinks, Stationary Source Committee Chair, representing Santa Clara County. Over the last year, the SBOSG has identified the need for an odor study to better understand the contribution of different odor sources in the Milpitas community.

**DISCUSSION**

In January 2019, the Air District committed to conduct an Odor Attribution Study to identify compounds from odor-producing facilities that are impacting Milpitas and nearby communities. The three facilities are located close together and have similar odor profiles. The proximity and similarity of the facilities has made it difficult to trace the odors experienced by community members to specific facilities, which is required for the Air District to be able to take regulatory or enforcement actions. The goal of the Odor Attribution Study is to determine the contribution and variability of odors from these facilities and measure how often and at what concentration



these odors may be passing into the local community to inform future actions to reduce odors.

The Air District released a Request for Proposals (RFP 2019-004 Odor Study) to identify contractors with the expertise to measure sources of odors from the landfill, transfer station, sewage treatment plant, compost, and organic waste processing operations in Milpitas. The proposals were scored based on expertise, skill, approach, cost, references, certified green business status, and local business status. Based on the proposal scoring and interviews, two complementary proposals were recommended for funding (Table 1). The Jacobs Engineering Group proposal exceeded the \$100,000 Administrative Code limit and was approved by the Air District Board of Directors on November 20, 2019.

Table 1

Respondent	Project Scope	Proposed Budget
Montrose Environmental Group	Deploy advanced real time and integrated air measurement and sampling technologies on a mobile laboratory platform, during a targeted sampling event, to identify odor causing species and facility chemical markers in the part per billion and part per trillion range, providing data and information to focus the efforts of other study participants.	\$92,000
Jacobs Engineering Group	Characterize diurnal and seasonal odors by conducting focused field sampling and data collection at representative times over a minimum of three seasons; develop odor intensity persistency curves; perform data analysis for critical chemical odorant compound identification; conduct odor dispersion modeling; perform electronic nose evaluations; develop ongoing fence-line measurement methods; prepare progress and final reports and participate in public meetings.	\$500,000

The Montrose Environmental Group project is a shorter-term study, which will identify compounds of interest for longer-term study through the Jacobs Engineering Group study. Montrose Environmental Group’s project will provide data on very low concentration (parts per trillion) trace chemical species and chemical markers. This highly advanced technical approach using Proton Transfer Reaction – Time of Flight – Mass Spectrometer (PTR-TOF-MS) can be used to develop chemical profiles contributing to the odors and enhance source attribution efforts.

The Jacobs Engineering Group project will identify odorant compounds impacting the area of concern via comprehensive quantitative and qualitative analyses and determine the relative contribution and variability of the odor-causing compounds emitted from the key source facilities. The study will take place over a minimum of three seasons and will include measurements at the facilities boundaries as well as in the community.

The Jacobs Engineering Group proposal includes five main tasks:

- Reviewing existing odor, concentration and meteorological data from previous studies
- Odor causing compound, contributor and masking effect identification
- Modeling source attribution of odorous releases based on compound identification results
- Develop a method to measure ongoing performance of the facilities at reducing odors
- Conduct public meetings for community members to receive regular updates on the results of the study

Staff have presented information about this project to the SBOSG and sought their input on the study. As part of this Agenda Item, staff will update the Board on the project and the specifics of the scopes of work for both companies.

#### BUDGET CONSIDERATION/FINANCIAL IMPACT

Funding for these studies will come from the General Fund Budget for Fiscal Year Ending 2020.

Respectfully submitted,

Jack P. Broadbent  
Executive Officer/APCO

Prepared by: Jerry Bovee  
Reviewed by: Ranyee Chiang