November 10, 2025

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Electronically Submitted via https://ww2.arb.ca.gov/lispub/comm/bclist.php

RE: LANDFILL METHANE REGULATION PROPOSED AMENDMENTS

California Air Resources Board Staff:

The Western Placer Waste Management Authority (WPWMA) appreciates the opportunity to comment on the Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills.

The WPWMA is a joint powers authority established in 1978 by the County of Placer and the cities of Lincoln, Rocklin, and Roseville (Member Agencies) that provides recycling and waste disposal services to the majority of Placer County. At the heart of the WPWMA's campus is Placer County's only active landfill. The WPWMA's facilities provide for environmentally protective disposal of solid wastes and ensure that municipalities, businesses, and individuals continue to comply with local, state, and federal regulations.

If approved, the proposed amendments will significantly impact landfills across the state, imposing increased unnecessary operational and financial burden on local government agencies to comply with an increasingly stringent regulatory environment with little added environmental benefit.

The proposed The WPWMA believes the following sections of the proposed amendments to the regulation are problematic and require revisions as described below:

1. § 95464 Gas Collection and Control System Requirements

   (b)(1)(A)(2) Instances out of the owner's control, such as power outages or periods when the Gas Collection and Control System (GCCS) is down for maintenance **should be exempt** from a proposed GCCS downtime limited to 120 hours in a calendar year.

   (b)(1)(E) The requirement to record system pressure on the vacuum (negative pressure) side of the blower every 15 minutes **should be removed** as this will require existing chart recorders to be updated, resulting in additional cost.

   (b)(5) & (6) New Plan requirements for Component Leak Monitoring and Cover Monitoring – **Clarify** whether there is a requirement to submit to the local Air

District for review and approval. The review process **should** be clearly outlined with additional timelines in place to prevent landfills from being subject to any penalties as a result in delay of review and approval once submitted to the regulating authority.

(c)(2) To prevent a possible Surface Emission Monitoring (SEM) exceedance, the regulations **should allow** for decommissioning of a well – including those without five years of monitoring data – that have been demonstrated to not be functioning as intended (i.e. video footage showing a pinch, shear, damage or plugged perforations).

Furthermore, a **distinction** should be made between well replacement or decommissioning a well without replacement, with details on what will be considered sufficient proof, including required distance, that radius of influence is being maintained by other active gas extraction equipment.

(e)(3) Limiting the number of wells offline to 5 at any time greatly restricts operations at the active face of a landfill. We **suggest** the requirement be no more than 10 wells or 10 percent of the total number of wells.

2. § 95469 Monitoring Requirements

   <u>Enhanced Wellfield Monitoring</u>

   The proposed enhanced well-field monitoring requirements include adding prescriptive oxygen concentration limits that have been removed by the Federal Environmental Protection Agency (EPA) based on flexibility and effectiveness. These additions **should be removed** from this proposal based on the following primary arguments made by the EPA during the removal of these limits in the Federal Rule:

   - Arbitrary Limits: The EPA determined that the previous limits (e.g., 5% oxygen or 20% nitrogen as an exceedance trigger) were not always appropriate for all landfill conditions. High oxygen levels can be a natural result of gas production declining in older waste sections, and not necessarily indicative of a fire risk or poor performance in those specific areas.
   - Operational Flexibility: The previous, strict limits could hinder the most efficient operation of the Gas Collection and Control System (GCCS). Landfill operators were sometimes forced to take actions that focused on meeting the specific wellhead criteria rather than focusing on optimizing the overall system for maximum gas capture and emission reduction. Removing the rigid limits provides operators with more flexibility to adjust the system to site-specific conditions.
   - Focus on Relevant Indicators: The EPA shifted the focus to other operational parameters considered more direct indicators of system performance. The current rules emphasize maintaining negative pressure at the wellhead (to ensure gas is being drawn into the system) and a temperature below 131°Fahrenheit (55°Celcius) (to indicate a potential subsurface oxidation event or fire risk) as key operational standards for triggering corrective action.

- Burdensome Compliance: Industry comments, which the EPA considered, noted that the previous requirements could result in an "overly burdensome compliance exercise" that didn't always translate into actual emission reductions.

In addition, under § 95469 (e)(6), recurring high oxygen would trigger enhanced monitoring for temperature, which does not align with EPA regulations. This section requires **further explanation** or needs to be separated out from high oxygen enhanced monitoring for clarification. We would expect that both the five percent oxygen requirement and the fifteen percent positive pressure requirement be **removed** and **consistency with EPA Federal Rule Making be maintained**.

Wellhead Monthly Trend Analysis

Remove the requirements of § 95469 (e)(7), Wellhead Parameter Trend Analysis, in its entirety. These additional requirements add a significant amount of unnecessary additional reporting and monitoring to all landfills, even those that are in full compliance and do not have SEM exceedances or sub-surface migration issues.

Remove the requirements of § 95469 (g), Gas Collection System Pressure Monitoring, which includes requirements of 95464(b)(1)(E) commented on above, in its entirety. Set points can require frequent adjustment due to operational changes and there must be flexibility within regulations to run the system optimally. It is unreasonable to require that the entire gas collection system be re-tuned in one day of the system pressure change.

3. § 95470(b) Reporting Requirements

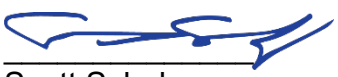
   The additional mapping requirements **should** consider that not all sites have the ability to produce shapefiles (.shp or .kml). The fifteen calendar day deadline after the quarter end for submission of the Quarterly Report leaves very little time for data validation and correction. Recommend **revising** to forty-five days from the end of each quarter.

4. § 95471(c) Surface Emissions Monitoring Requirements

   A standardized method with formula to calculate inches per year **should** be added to adjust the “Average Precipitation Plus Liquids”, specifically for adjustments for leachate or other liquids based on inputs in gallons per year and surface area reduction.

The WPWMA appreciates CARB’s consideration of these comments welcomes further discussion to lead to a more practical and successful result in addressing landfill gas emissions.

Sincerely,



Scott Scholz
General Manager