



Andy Cortez, General Manager-Chief Engineer

VIA ELECTRONIC SUBMITTAL

November 10, 2025

Quinn Langfitt, Staff Air Pollution Specialist
California Air Resources Control Board
Short-lived Climate Pollutant Policy Section
1001 I Street
Sacramento, CA 95814

RE: Comments Regarding Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills

Dear Mr. Langfitt:

The Riverside County Department of Waste Resources (RCDWR) appreciates the opportunity to comment on the California Air Resources Board's (CARB) proposed amendments to the regulations on methane emissions from municipal solid waste landfills (referred to as the Landfill Methane Regulation [LMR]). We acknowledge the critical role CARB has played, and continues to play, in reducing methane emissions from landfills, and thereby reducing greenhouse gas emissions in California.

The RCDWR is a public agency whose mission is to protect public health and welfare through the efficient management of Riverside County's solid waste system. The active solid waste system currently includes five County-owned and operated landfills, along with thirty-three closed/inactive landfills also managed by RCDWR.

Considering the significant number of landfills managed by RCDWR, any changes to the LMR could have significant impacts on the limited resources dedicated to the efficient operation and maintenance of these landfills. Our landfills have long served Riverside County residents by providing a local, affordable and sanitary means of solid waste disposal. We are committed to continuing this service into the future.

The purpose of this letter is to provide comments and recommendations on the proposed changes to the LMR. While RCDWR supports the overall goals of the regulation, we offer the following comments on specific proposed changes.

Section 95464 (b)(1)(A)2.

A defined limit on the number of allowable downtime hours per calendar year is not practical. RCDWR has experienced increased instances where our electrical utility provider could not supply power or elected to curtail power for safety reasons. Requiring backup power at our landfills would result in substantial and unanticipated economic impacts far beyond those considered in the proposal's analysis.

RCDWR recommends that this limit be removed from the proposed LMR.

Section 95464 (c)(2)

The two specified criteria for well decommissioning are too limited and do not account for the variable conditions found across landfills. Additional operational factors may justify decommissioning, such as:

1. Newly constructed well – A newly constructed well could prove to be inefficient (i.e. low methane concentration) immediately or shortly after connecting to the gas collection and control system. Such a well should not be required to operate 60 months before decommissioning.
2. Damaged well – Wells installed within active fill areas are prone to damage during landfill operations and are often determined to be no longer functional. In addition, landfill settlement can result in wells becoming inefficient or nonfunctional. It is unclear whether a replacement well must be installed before decommissioning a damaged well under Section 95469 (f)(1)(A). In practice, a damaged well should be decommissioned as soon as it is determined to be nonfunctional, as it may pose an operational hazard and increase the potential for surface emissions.

The two instances described above warrant well decommissioning but are not addressed in the proposed criteria. RCDWR recommends that the criteria be removed or revised to allow for other operational circumstances where well decommissioning is warranted.

Section 95464 (e)

RCDWR recommends expanding the exemptions to include subsurface elevated temperature (SET) events. While operating gas collection wells during SET events is generally advisable, there are situations where temporarily shutting down components may be necessary to assess the event or mitigate oxygen intrusion.

Section 95464 (e)(2)

The requirement to return components to operation within five calendar days is not practical in all cases. Landfill gas system components are not always stocked in duplicate or readily available for purchase and installation within that timeframe. RCDWR recommends that this timeframe be expanded to 10 calendar days.

Additionally, RCDWR recommends expanding this exemption to explicitly include SET events for the same reasons noted above.

Section 95469 (a)(1)(B)

Requiring corrective action within three calendar days effectively means initiation within one business day in some instances, which may not be feasible given staff, equipment, or material availability. RCDWR recommends the timeframe be expanded to three business days.

Section 95469 (a)(1)(B)3. and (a)(2)(B)3.

The current LMR and the applicable Federal regulations define surface emission remediation as being achieved when new or replacement wells are installed within the timeframe established by the regulations. Immediate remediation of surface emissions is not always possible, as it takes time to equilibrate and optimize the gas collection system. RCDWR recommends the proposed section be modified to match the applicable Federal regulations.

Section 95469 (e)

The section includes multiple references to downwell temperature monitoring. Because not all wells are vertical, RCDWR recommends revising the section to address temperature monitoring requirements for horizontal wells.

Section 95469 (e)(1)

A zero pressure reading is not equivalent to a positive pressure reading. While a zero reading indicates that the well is not under vacuum, it also means there is no landfill gas pressure. If the intent is for all wells to remain under vacuum, the section should be revised to state that explicitly.

Section 95469 (f)

There are horizontal wells and buried vertical wells where the liquid level measurement requirement is not relevant or practical. RCDWR recommends the subject section be revised to reflect these cases.

Section 95469 (g)(1)

Re-tuning all wells within one calendar day of a pressure setpoint change is not feasible. Some RCDWR landfills have up to 150 wells, and re-tuning is a multi-day effort. RCDWR recommends the timeframe be expanded to five business days.

Section 95470 (b)(5)

Requiring at least 15 calendar days advance notice of scheduled surface monitoring is impractical. RCDWR's surface monitoring schedule is frequently affected by both wind conditions and staff availability. Given that wind conditions cannot be reliably forecast by the National Weather Service 15 calendar days in advance, RCDWR recommends reducing the notification requirement to 5 calendar days to ensure more accurate scheduling and effective monitoring.

Closure

Thank you again for the opportunity to participate in the rule making process and comment on the proposed LMR. RCDWR remains committed to the efficient use of Riverside County's resources for the benefit of the public we serve. The comments provided herein are intended to support that mission while ensuring practical and effective implementation of landfill methane reduction goals. If you have any questions or wish to discuss our comments further, please contact me at (951) 486-3200.

Respectfully submitted,

Todd D. Shibata, P.E.
Principal Engineer

JG/AC/SC: tds

cc: Andy Cortez, Jeff Gow, Sarah Lunetta, Eduardo Castellanos; RCDWR (via email)

PD#365409