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SAN BERNARDINO COUNTY

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November 10, 2025

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: SAN BERNARDINO COUNTY SOLID WASTE MANAGEMENT DIVISION – COMMENTS ON 45-DAY PROPOSED LANDFILL METHANE REGULATION

To Whom It May Concern:

The San Bernardino County Solid Waste Management Division (SWMD) appreciates the efforts of the California Air Resources Board (CARB) staff in developing the proposed amendments to the Landfill Methane Regulation (LMR) and for providing an opportunity to comment on language that may present potential implementation challenges.

SWMD recognizes the importance of updating the current LMR to incorporate proven new technologies and enhance predictive monitoring and data collection. While we fully support these goals, several elements in the proposed amendments require further consideration to ensure that landfill owners and operators can safely and efficiently manage their facilities and comply with the revised requirements.

In particular, SWMD believes that effective implementation of the proposed rule will require coordination with local Air Quality Management Districts (AQMDs) and the development of corresponding local regulations. The proposed amendments introduce new infrastructure needs, field activities, regulatory notifications, reporting requirements, and oversight responsibilities. For example, provisions related to the resubmission of previously approved Alternative Compliance Plans, the use of unapproved alternative monitoring methodologies, and new wellhead operation and monitoring thresholds must be aligned with local AQMD regulations to ensure safe and compliant operations.

The successful implementation of the original LMR in 2009 was largely due to CARB's delegation of implementation authority to local AQMDs, as required by the Board Resolution at the time. SWMD recommends that this same coordination process be incorporated into the rollout of the proposed amendments to ensure consistent, practical, and enforceable application statewide.

Attached as Attachment A is a summary of SWMD's key concerns with the proposed amendments, along with recommended alternatives for CARB's consideration. These suggestions are intended to support CARB's efforts to strengthen and refine the regulation while

maintaining reasonable expectations for implementation. SWMD appreciates the significant work invested in this update and shares CARB's commitment to advancing methane reduction goals. Our recommendations are intended to enhance the regulation's effectiveness while preserving operational safety, efficiency, and sustainability for field staff.

If you have any questions or require additional information regarding this submittal, please contact me at (909) 386-8701 at your convenience.

Sincerely,

Marc Rodabaugh

Marc Rodabaugh, P.E.
Deputy Director, Solid Waste Management Division

Attachment

Cc: Johnny Gayman, SWMD
Pete Ligorria, SWMD
Sami Ayass, TetraTech
Robert Legaspi, SCS

ATTACHMENT A

Topic	Potential Issues	Concerns	Potential Alternative
Grandfathered Existing Conditions specifically GAC or other treatment systems (aka not active controlled operations)	• "Uncontrolled MSW Landfill" means a MSW landfill that is not a controlled MSW landfill. MSW landfills that use a passive venting or carbon adsorption system are uncontrolled MSW landfills. • Uncontrolled MSW Landfills: By March 15, 2027, each owner or operator of an uncontrolled MSW landfill (as defined in section 95475) shall calculate the landfill gas heat input capacity pursuant to section 95471(b) and shall submit an Annual Uncontrolled Landfill Report to the Executive Officer. • Submit an Annual Uncontrolled Landfill Report by March 15 each year to the Executive Officer until either of the following conditions is met: • The calculated landfill gas heat input capacity is greater than or equal to 3.0 MMBtu/hr recovered, or • If the MSW landfill is active, the owner or operator submits a Closure Notification pursuant to section 95470(b)(1). Submitting the Closure Notification fulfills the requirements of this subarticle. If the MSW landfill is closed or inactive, submittal of the Closure Notification is not required to fulfill the requirements of the subarticle.	• How are grandfathered sites going to be treated under the proposed review? Specifically related to already approved and installed GAC systems? • Will closed sites need to resume completing annual Heat Input Capacity (HIC) report – using lower 970 heating value for calculation – Report due March 15th? • Will closed sites that are completing annual SEM need to restart the 4 consecutive quarters without exceedances requirement?	• No requirement for Annual Reporting and calculating HIC annually. • No requirement for restarting quarterly SEM if site has already been without SEM exceedances for 4 consecutive years.
GCCS Install/Construction 95464(a) and (c)	• 6 months to install and operate a gas system on active sites without GCCS • Time frame is different for closed landfill. For closed landfills, requires 18 months to install and operate a GCCS. • Shortened timeframes overall	• Governmental Agencies, as opposed to private entities, must adhere strictly to a regulatory-prescribed procurement and contracting processes (State Public Contracting Code) and require time for review by elected officials and public notice of a governing board action. A 6-month schedule	• For active sites update requirement to 15 months to install GCCS. • For closed sites change requirement back to 30 months to install GCCS. • No more than 10 wells or 10 percent of the total number of wells can be offline at one time.

Topic	Potential Issues	Concerns	Potential Alternative
	• No more than five wells or five percent of the total number of wells at the MSW landfill, whichever is greater, are offline at any one time, except in cases where wells are being shut down to prevent or extinguish fire. Decommissioned wells do not count toward this limit or the total number of wells.	is simply not tenable for municipality to complete the bidding and award process followed by a construction period. • Flare procurement generally takes 8 months to 1 year out for delivery. • What if Executive Officer has an adjustment to the design plan that could modify the design and affect permitting and GCCS construction/installation. • Over the past few years, some AQMDs have generally taken longer than 6 months to approve a permit application. How does this affect 6-month timeline to install a GCCS? • New rule could trigger simultaneous installations causing a supply shortage similar to the issues we saw with the SJVAPCD implementation of the 4311 Flare Rule or SCAQMD Implementation of Rule 1118.1. • Limiting the number of wells offline to 5 total can greatly restrict operations at the active face of the landfill.	
GCCS downtime 95464(b)(1)(A)2.	• Only 120 hours allowed per year	• Does not define what is included specifically in the 120 hours • Maintenance should not be included • What about power outages that are out of the owner's control?	• Alternative 1: Remove 120 hour limit. • Alternative 2: Allow for a total of 240 hours for total system shutdown. • Include variances in the 240 hours limitation/restriction: • Ex: Do not include Power Outages or periods when the GCCS is down for maintenance as part of the 120 hours limit.

Topic	Potential Issues	Concerns	Potential Alternative
New Plans – 95464(b)(5) & (6)	Component Leak Monitoring Plans Cover Monitoring Plans due within 90 days of the rule promulgation	• Will the AQMD need to approve the plan? Would the landfill be subject to any penalties as a result of delays from the AQMD in approving the plan?	N/A
Well Decommissioning 95464(c)(2)	• A well can be permanently decommissioned only if it meets one of the following criteria, and provided that surface emissions monitoring is performed within 30 calendar days after disconnecting the well from vacuum that shows no exceedances of the standards in section 95465 in the grid in which the well is located: • The wellhead methane content exhibits a long-term (at least 60 month) declining trend and is below 20 percent by volume. • Prove radius is covered by other component	• What about wells that do not have 5 years of monitoring data available? • What if a well is damaged, pinched or has silt plugging the perforations? Why shouldn't the owner be allowed to decommission immediately and remove the penetration as a possible SEM exceedance?	• Allow decommissioning a well when it can be demonstrated that the well is not functioning as intended (ie. Video footage showing pinch, shear, damage or plugged perforations). • Remove requirements for SEM at 30 calendar days after disconnecting well from vacuum. • Distinguish between well replacement or decommissioning a well without replacing. • What will be considered sufficient proof that radius is covered by other components/well? How far must the well be to prove radius? 100 ft away? 150 ft away? 200 ft away?
Closure/Intermittent Operation/non-flare operation 95467	• Multistep processes for Semi-continuous operation, Conditional Shutdown, to permanent Shutdown • May need to look at full process and pull out any elements that could be problematic for sites close to closure.	• Can continuous operation using GAC be used in lieu of semi-continuous flaring? This way the GCCS is operated consistently and prevents the build up of methane/Landfill Gas when the system is down intermittently/semi-continuously which could lead to SEM exceedances and/or subsurface migration/GW impacts while the GCCS is down intermittently.	• Allow use of GAC treatment system in lieu of semi-continuous flaring operation.
Alternative Compliance Plans 95468	1. Expire April 1, 2027 – Need to resubmit to continue and get new approval 2. CARB can revoke 3. Intermittent operation no longer an ACO but a different condition/regulation within rule 4. Allowed ACO for SEM per Rule:	• If an ACO has already been approved, why should it need to be re-submitted and subject to another review before being re-approved?	• Grandfather in ACOs that have already been approved by Executive Officer or CARB.

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	a) Wind/Rain requirements – need to show LF consistently experiences issues related to weather b) Alternative timelines for repairs if site can show issue with procurement or delivery issues or if weather impedes repairs. 5. No longer allowed: a) Alternative walking paths b) Exclusion areas due to danger in traversing c) Paved roads.		
Enhanced Wellfield Monitoring (95469)	1. High Oxygen a) ≥5% O_2 v/v (3x in 12 months) • Begin enhanced monitoring; perform assessments (200-ft radius) and repair intrusion points; track CO & temperature weekly. • 95469(e)(6)Recurring High Oxygen: If, within any 12-month period, there are three instances of oxygen content in landfill gas measured at or above five percent by volume in monthly monitoring at a particular well, the owner or operator shall conduct enhanced monitoring and downwell temperature monitoring within seven calendar days of the third oxygen content reading at or above five percent and conduct enhanced monitoring weekly thereafter. If four consecutive weekly carbon monoxide readings are under 100 ppmv, and temperature is under 131 degrees Fahrenheit, then enhanced monitoring and downwell temperature monitoring can be ceased. Enhanced monitoring	• Oxygen is no longer considered an issue in Federal rules see reasons in Argument Against Column. • High oxygen recurrence monitoring for temperature - 95469(e)(6) - monitoring every 10 feet is unclear what triggers that. For Federal regulations it is excess temperature, but this appears to be related to oxygen. Needs to be clarified or separated out from high oxygen enhanced monitoring for clarification. • Positive Pressure: 15% of wellfield without pressure exceedances to return to monthly monitoring from weekly.	EPA Arguments for Removal of Oxygen The EPA's primary arguments for removing the prescriptive oxygen concentration limits were based on flexibility and effectiveness: • 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

Topic	Potential Issues	Concerns	Potential Alternative
	shall be conducted according to the procedure in section 95471(o). Downwell temperature monitoring shall be performed every 10 vertical feet and can be monitored either with a removable thermometer or using temporary or permanent thermocouples installed in the well. This requirement does not apply to wells that collect gas in areas where waste has been in place for less than two years. 2. High Temp = enhanced monitoring a) >55 °C (131 °F) for ≥60 days – • Begin enhanced weekly monitoring (200-ft radius); perform collection & cover integrity assessments; correct causes • Assess ≤30 days • Correct ≤60 days b) >62.8 °C (145 °F) at wellhead or down-well • Conduct root-cause & corrective-action analyses; continue weekly monitoring (T, CO, CH_4, CO_2, O_2). • RCA ≤75 days • Correct ≤120 days 3. Positive Pressure - ≥0 in H_2O (3x in 12 months) a) Weekly pressure & temperature checks; expand GCCS or rebalance vacuum if persistent. b) Monitor the wellhead pressure on at least a weekly basis. Monthly monitoring can resume following one year with positive pressure in no more than 15 percent of the weekly measurements, provided that all instances of positive pressure are able to be		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°F (55°C) (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 • Remove 5% oxygen requirement from Rule and be consistent with EPA Federal Rule Making. • Remove 15% Positive Pressure Requirement.

Topic	Potential Issues	Concerns	Potential Alternative
	corrected within the same week (prior to the next weekly monitoring). If positive pressure is detected in more than 15 percent of the weekly (or more frequent) measurements over one year, install a system to continuously monitor pressure in the well. c) Correct ≤60–120 days 4. Enhanced Monitoring Trigger by exceedances a) Weekly readings for T, O_2, CO_2, CH_4, CO; down-well temps every 10 ft; visual inspection for smoldering or damage. b) Start ≤7 days c) Maintain until 4 clean weeks		
Wellhead Monthly Trend Analysis 95469 (e)(7) and (e)(8) and (g)(1)	• Flow rate has been added for monitoring. • Wellhead Parameter Trend Analysis: The owner or operator shall examine monthly records for each well and take the following actions: ○ If the temperature at a particular well increases by more than 20 degrees Fahrenheit (11 degrees Celsius) compared to the prior monthly measurement, begin enhanced monitoring and downwell temperature monitoring according to the same requirements as sections 95469(e)(3)(C)1. and 2. within seven calendar days. ○ If the oxygen content at a particular well increases by more than two percentage points compared to the prior monthly measurement, perform a collection system assessment and cover integrity assessment in a 200-foot radius around the well	• Abatement of liquid issues would be very costly if a LF doesn't have infrastructure in place (especially for closed sites that are no longer accepting waste and have lost revenue stream). Furthermore, if a site is in full compliance with SEM and no sub-surface migration with a downtrend of the LFG production, then why remove the liquids from individual wells as opposed to using the typical leachate extraction system? • Monitoring required for changes in vacuum set point for collection system. Set points change frequently due to operational changes (flares/engines online/offline, etc.). Need some flexibility to run system optimally without having to re-monitor whole landfill in one day. Need to do an average or something not daily. Need a longer re-monitoring time for whole	• Remove requirements of 95469 (e)(7) in it's entirety. These additional requirements add a significant amount of excessive reporting and monitoring, with no real impact on reducing GHG from landfills, especially if the site is in full compliance and does not have SEM exceedances or sub-surface migration issues. • Additionally, Landfills are dynamic and as a technician adds more vacuum to a well, in most cases, the LFG temperature will increase/climb. If a well is tuned up to pull more landfill gas , causing increased temperature increase of 20 degrees F, why should the additional monitoring take place? There are other indicators, outside of temperature, that are indicative of potential to start subsurface oxidation, and so why should an increase of temperature of 20 degrees

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	according to sections 95471(j) and (k) within 30 calendar days. ○ When the difference between the monthly parameter value and the average parameter value in the prior 12-month period (rolling) at a particular well is greater than the difference identified below, report the cause of the change in the Annual Gas Collection and Control System Report: ▪ Gauge pressure changes (i.e., increases or decreases) by more than two inches of water at a well with a 12-month average vacuum of 10 inches of water or less, or by more than 20 percent at a well with a 12-month average vacuum of more than 10 inches of water. ▪ Methane content changes by more than five percentage points at a well with a 12-month average methane content greater than 30 percent, or methane content changes by more than 10 percentage points at a well with a 12-month average methane content equal to or less than 30 percent. ▪ The ratio of methane to carbon dioxide decreases by more than 10 percent or falls below 1.0. ▪ Landfill gas flow rate changes by more than 30 percent If any of the parameters required in section 95469(e) are monitored more frequently than	wellfield especially if very large (ie. 2 weeks or 1 month).	between one month and then next trigger enhanced monitoring and downwell temperature monitoring? • Remove requirements of 95469 (g)(1) in it's entirety as it is not reasonable to expect the entire gas collection system can be re-tuned in one day whenever the vacuum set point is adjusted (especially in the winter months when there is heavy rain and the cover is saturated). • What defines a vacuum set point is adjusted? Adjusted by 1'' W.C.? 2'' W.C.? 15'' W.C.?

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	weekly (e.g., wells equipped with a continuous wellhead monitoring system), the following apply: 1. The conditions which require action to be taken in sections 95469(e)(1), (3), (4), and (5) are based on exceeding the parameter threshold in at least 15 percent of the readings over the prior 30 days (e.g., a positive pressure reading is established for purposes of section 95469(e)(1) when positive pressure is measured in at least 15 percent of the readings over the prior 30 days on a rolling basis) or an exceedance that persists for five consecutive days. 2. The monthly parameter value used in sections 95469(e)(2), (6), and (7) is the average of all readings within each calendar month. If the liquid level in a well exceeds 50 percent of the screened interval length for three consecutive monitoring events or 75 percent of the screened interval length for two consecutive monitoring events, the owner or operator shall install and operate a liquids pump within 120 calendar days of the third consecutive reading over 50 percent or the second consecutive reading over 75 percent. The owner or operator shall establish a gas collection system pressure setpoint. This setpoint can be changed as often as needed to respond to operational conditions. Each time the gas collection system pressure setpoint is changed, the owner or operator shall re-tune all wells within one calendar day of the system pressure change.		

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Reporting 95470(b)	1. Annual Report - Most recent topographic map of the site in an electronic format compatible with viewing in a geographic information system (e.g., file formats of .shp or .kml) showing the following, with separate files as needed to show any changes during the calendar year: ○ The perimeter of the permitted disposal area, the area of the landfill under which decomposable solid waste has been placed, and areas with daily, intermediate, and final cover, including the cover material type over the landfill surface. ○ Area of the working face with waste in place less than 180 days, the date when filling began and the date surface emissions monitoring is conducted. 2. Quarterly.Monitoring.Data.Report¿Any owner or operator subject to the requirements of this subarticle, except section 95463(b), shall submit to the Executive Officer as described in section 95470(b)(8) the following monitoring data covering each calendar quarter within 15 calendar days of the end of each quarter (i.e., January 15, April 15, July 15, and October 15) in comma separated value (.csv) file format: 1. Records of all surface emissions monitoring data as described in section 95470(a)(1)(D). 2. Records of all component leak monitoring data as described in section 95470(a)(1)(F). 3. Records of all wellhead monitoring data as described in section 95470(a)(1)(I).	• Not all sites have prior experience producing shapefiles (.shp) or KMLs; conversion errors or missing attribute tables can delay submission. • Tight deadline for Quarterly Reports – fifteen calendar days after quarter end leaves very little time for data validation, QA/QC, and data correction.	• Revise deadline for quarterly reports to be 45 days of the end of each quarter (similar to SCAQMD's quarterly Rule 1150.1 reports).

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	3. Annual Uncontrolled Landfill Report: Any owner or operator subject to the requirements of section 95463(b) shall submit an annual report to the Executive Officer as specified in section 95470(b)(8) annually by March 15, starting March 15, 2027. The annual report shall contain the following information: MSW landfill name, owner and operator, address, current email address, phone number, solid waste information system (SWIS) identification number, the waste footprint (in acres), the landfill's operational status (active, closed, or inactive), the landfill's gas collection status (no collection, passive venting, or carbon adsorption), the year the landfill first and last accepted waste, and the expected year of landfill final closure. 1. The total amount of solid waste (in tons) deposited each year the landfill was in operation. No adjustment can be made to account for inert waste, but areas of the landfill that contain only asbestos-containing waste, inert waste, or non-decomposable solid waste may be excluded provided that the owner or operator submits documentation to the Executive Officer containing the nature, date of deposition, location and amount of such wastes deposited in the area. 2. Annual solid waste disposal amounts shall be determined in accordance with California Code of Regulations, Title 14, Division 7, Chapter 9, Article 9.2, Section		

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	18810.2 (January 1, 2006), which is incorporated by reference herein. 3. Total area of the landfill surface (in acres) with each cover type (daily, intermediate, and final cover). 4. All surface emissions monitoring data generated pursuant to section 95463(b)(2)(B), including concentration reading, location coordinates, and time and date of each measurement (i.e., each at least one hertz reading). 5. The 100-year historical annual average precipitation (in inches), recorded at the County level or at the nearest weather station, and the volume (in gallons) of leachate or other liquid deposited or injected into the landfill, including separated wet waste with moisture content greater than 40 percent. 6. The calculated landfill gas heat input capacity determined using the calculation procedures specified in section 95471(b) and the data inputs specified in sections 95470(b)(6)(B) and (E). 7. For landfills with carbon adsorption or passive venting systems, all measurements of landfill gas flow rate (in scfm) and methane content used to calculate heat input capacity using the procedure in section 95471(b)(2) or (3). 4. Remotely Detected Emission Plumes: Any owner or operator that receives a notification of		

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	a remotely detected emission plume pursuant to section 95469(b)(1) shall report the following information to the Executive Officer as specified in section 95470(b)(8): Within eight calendar days after receiving the notification at a controlled MSW landfill: the date of the CARB notification; identification number provided by CARB in the notification; date of the owner or operator follow-up monitoring; instrument model used; the number of exceedances of the surface emissions limit specified in section 95465(a)(1); the number of component leaks; the location and a brief description of the source of each exceedance and component leak; an initial mitigation plan for each exceedance and component leak; and a brief description of any activities that may have contributed to the plume within the monitoring area during the time of the remote detection. The initial mitigation plan shall consist of a statement of whether the source of each exceedance or component leak has already been successfully repaired and re-monitored and, if not, a description of what actions the owner or operator anticipates taking to complete each repair and the estimated date of completion of each repair. 1. Within five calendar days after the re-monitoring that first shows each exceedance or component leak to be corrected: repair date, re-monitoring dates, and re-monitoring concentrations in ppmv. 2. Within 35 calendar days after receiving the notification at an uncontrolled MSW landfill:		

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	the date of the CARB notification; identification number provided by CARB in the notification; date of the owner or operator follow-up monitoring; instrument model used; and records of all exceedances of the surface methane concentration value specified in section 95463(b)(2)(B), including the concentration and location of each exceedance.		
SEM 95471(c)	1. No more exclusion areas, all areas to be monitored via alternative methods if walking is not feasible (95469(a)(1)(b) and (2)(b)) a) Drones, laser, rover mounted device. b) Working face only exempted for 180 after initial placement 2. Alternative correction plan for requests not including well install – timeline is tight. 3. Repeated exceedances (≥5 instantaneous or ≥3 integrated within 12 months) require system and cover assessments and monthly monitoring including adjacent grids until no exceedances for 6 consecutive months a) Complete a collection system assessment as described in section 95471(j) and a cover integrity assessment as described in section 95471(k) within 30 calendar days after reaching the threshold in section 95469(a)(4) and correct any issues identified in the assessments that could be contributing factors to the surface	• How do you remediate areas that exceedances are detected if the slopes are too steep or active areas with heavy equipment are too dangerous for personnel to enter? • Who is going to hold the Executive Officer (AQMD) to the deadline for the alternative timeline? • If denied, the site would need more than 30 days to install a well especially in areas that are difficult to get to. • Timelines make the assessment and correction unrealistic. • Timelines could be issue. Area required could be problematic. • What happens if the date of the SEM has to move due to site conditions or weather requirements. • SEM report preparation and submittal by the 15th of the month following the quarter would be very difficult to achieve.	• SEM report due date should be revised to be each quarter by the 45th day after the end of each quarter. • Allow use of local weather stations for wind speed and barometric pressure readings in lieu of requiring facilities to have equipment to measure wind speed and barometer pressure.

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	exceedances within 60 calendar days after reaching the threshold. 4. CARB Plume ID Requirements 5. Scheduled.Surface.Emissions.Monitoring. Notification¿Any owner or operator subject to the requirements of this subarticle shall report to the Executive Officer as specified in section 95470(b)(8) the scheduled date for each surface emissions monitoring event pursuant to section 95469(a) at least 15 calendar days prior to the event. This requirement does not apply to re-monitoring following the discovery of surface methane exceedances. 6. SEM report due by the 15th of the month following the quarter ❸ All wind speed and barometric pressure readings for the duration of all surface emissions monitoring¡		
Table 1 Average Precipitation Plus Liquids and k Values	Determination of recirculation to precipitation equivalency.	• Calculation for average precipitation will need to be adjusted for leachate or other liquids addition but there were no details provided on how to standardize the calculation (in inches per year) for any liquids addition.	• Add a standardized formula/method to adjust the “Average Precipitation Plus Liquids” specifically for the adjustments for leachate or other liquids addition based on inputs for gallons/year and surface area or recirculation.