



California Air Resources Board (CARB)
Attn: Clerk of the Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Proposed Methane Regulations – Landfill Methane Collection and Control Systems

Dear CARB Staff:

The El Dorado County Air Quality Management District (AQMD) appreciates the opportunity to comment on the proposed methane regulations. The Union Mine Landfill, which only accepts waste generated onsite, is the only County-owned and operated facility in El Dorado County with an active methane extraction system. The AQMD does not currently have a Memorandum of Understanding (MOU) with CARB to implement CARB's Landfill Methane Gas Regulations.

With only an active 6-acre Class II cell expected to begin closure within the next four years, the landfill's gas production has declined significantly—from approximately 450 cubic feet per minute (CFM) at 50% methane in 1997 to about 175 CFM at roughly 25% methane today—indicating that the site is nearing the end of its gas production life.

According to the Union Mine Landfill Site Supervisor, the estimated costs associated with potential compliance measures could be significant. These include up to \$30,000 for new pressure-sensing equipment at the flare; up to \$7,500 per pump for air-operated (or possibly electric) well pumps; up to \$15,000 for an air compressor system; and up to \$10,000 to tie into existing gas header lines for leachate. If a separate above-ground leachate collection system is required, the cost could increase by an additional \$150,000 or more. Depending on the system configuration and site conditions, total compliance costs could reach over \$200,000.

For a small landfill nearing the end of its lifecycle, these requirements would impose an undue financial and operational hardship without providing a proportional environmental benefit compared to large, active landfills.

El Dorado County AQMD respectfully recommends that CARB consider a tiered regulatory approach that differentiates between large, active landfills and smaller, or low-producing sites. Such an approach would maintain strong environmental protections while recognizing the reduced emissions potential and limited resources of small jurisdictions sites.

Thank you for working with us to improve air quality!

Thank you for considering these comments. El Dorado County AQMD appreciates CARB's ongoing commitment to reducing methane emissions and looks forward to continued collaboration to ensure the regulations are both effective and practical for all California landfills.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Rania Serieh', with a stylized, cursive script.

Rania Serieh

Air Pollution Control Officer

Thank you for working with us to improve air quality!