

November 10, 2025

Chairperson Lauren Sanchez
California Air Resources Board
1001 I Street
Sacramento, CA

Re: Support for Proposed Amendments to the Landfill Methane Regulation

Dear Chairperson Sanchez:

Thank you for this opportunity to comment on the proposed amendments to the Landfill Methane Regulation (LMR). The requirement to repair remotely detected methane leaks, the strengthening of onsite methane monitoring standards, and the additional requirements for landfill gas (LFG) collection and control systems (GCCS) will help improve controls at these sites. Additionally, enhanced recordkeeping requirements will help ensure operators document best management practices and unexpected changes that justify investigation. The new requirements will assist in reducing health impacts caused by exposure to toxic air contaminant (TAC) emissions, reduce public nuisance caused by emissions of odorous substances, help the Bay Area reach and maintain the federal and State ambient air quality standards, and continue moving us in the right direction for achieving needed greenhouse gas (GHG) reductions. The Bay Area Air District (Air District) has a number of landfills within our jurisdiction, including 13 permitted active landfills, 24 permitted inactive/closed landfills, and several other unpermitted closed sites, and as such, Air District staff strongly supports these proposed amendments and urges the Board to adopt them.

Remote Methane Sensing & Enhanced Methane Monitoring

We commend the California Air Resources Board (CARB) for incorporating existing technologies for remote detection of methane emission plumes into the LMR. We further commend CARB for strengthening requirements for onsite monitoring of methane emissions, including in areas of the landfill which operators previously claimed exemptions from monitoring. New surface monitoring techniques like drone and rover surveys have shown the potential to be more cost effective for operators in the long run, and widespread adoption of a variety of monitoring technologies can help inform future operational and regulatory efforts. These proposed changes will be essential for identifying and reducing short-term GHG emissions that have previously been difficult to quantify and address. We anticipate collaborating with CARB and continuing to be active partners in identifying methane plumes from landfills in our air basin through monitoring, remote sensing, and knowledge sharing and training.

Landfill Gas Collection and Control System Operation

Air District staff also supports the suite of proposed measures to improve GCCS operations. Proactive gas collection system (GCS) expansion at the working face and expedited timelines for corrective actions will help operators collect landfill gas sooner and reduce emissions, expanded wellhead monitoring and recordkeeping requirements will improve GCCS reliability and help identify potential issues early, and the new liquid level standards will improve LFG extraction. The Air District is pleased to see that the standards will apply to non-landfill entities that receive and process or burn landfill gas.

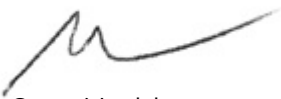
Additionally, the proposed standards for requests and approvals of semicontinuous operation will help ensure that all options for continuous operation are exhausted prior to the allowance of a semicontinuous operation. Our air basin has many closed landfills that have previously been approved for semicontinuous operation of their GCCS as an alternative compliance option, and Air District staff looks forward to working with CARB to implement the proposed standards to ensure landfills implement the most appropriate GCCS operations.

Resources for Implementation

While we welcome the improvements to the regulation, Air District staff share the concerns expressed by other air districts regarding the resources required for implementation. As co-implementers of this rule, air districts and CARB need to work together to ensure there is an accurate understanding of implementation costs and that those costs are equitably addressed.

In closing, Bay Area Air District staff greatly appreciate CARB staff's efforts to reduce health impacts and GHG emissions from landfills. We look forward to our ongoing collaboration.

Sincerely,



Greg Nudd
Deputy Executive Officer of Policy

Cc: Dr. Steven S. Cliff, Executive Officer, CARB
Tung Le, Executive Director, California Air Pollution Control Officers Association
Lynda Hopkins, Chairperson, Bay Area Air District Board of Directors