Christine Wolfe

Please find WM's comments on the 45-Day Package for the Landfill Methane Rule.

Section	Current	Proposed	Rationale
95464(e)(2) – Gas collection system component downtime limit before EO notification	5 days	30 days	Allow for routine maintenance and other operations-related downtime. Avoid inundating EO with reporting.
95469(a)(1)(B) – Instantaneous Surface Monitoring Corrective Actions & 95469(a)(2)(B) – Integrated Surface Monitoring Corrective Actions	Corrective action in 3 calendar days, re-monitor by 10 days.	Corrective action and re-monitor within 10 days.	Align with federal rules, reduce administrative burden and focus on correcting exceedances by allowing operator to identify, correct and re-monitor within a single timeframe.
95469(a)(1)(C) & (a)(2)(cC)– Final cover monitoring	If year with no exceedances, final cover may be monitored every 3 quarters.	Annual monitoring.	Align with federal rules. Requiring monitoring every three quarters impractical from an operator budgeting and planning standpoint and would impose separate state and federal timelines.
95469(a)(1)(D) & (a)(2)(D) – Exceedances detected during compliance inspections.	Automatic return to quarterly inspections.	Allow 10 day repairs and remonitoring.	Operator should have opportunity to correct prior to imposing quarterly testing.
95469(a)(1)(B)(2-3) & (a)(2)(B)(2-3) – Re-monitoring and	Re-monitor grid one month after exceedance, report replacement well to	Clarify that exceedances are not violations so	Federal rules specify that, so long as specified actions are taken, exceedances are not violations.

replacement well reporting	EO, replace within 120 days	long as specified actions are taken.	
95469(a)(4) – Recurring Surface Exceedances	Perform cover integrity assessment, monthly monitoring for impacted grid and all adjacent grids.	Limit to only affected grid and return to normal monitoring cadence after 3 months.	Would require excessive monitoring of areas not known to have issues. Efficacy of corrective action should be known after three consecutive months of monitoring.
95469(b)(2)(A) – Time limit to perform SEM after remote monitoring plume notification	Take actions within 5 calendar days	Take actions within 10 calendar days	Align with other monitoring methods.
95469(b)(2)(A)(1) – Plume detection monitoring area	Monitor 600ftx600ft square centered on plume origin	Monitor 50ftx50ft square centered on plume origin	Proposed 600ftx600ft monitoring area is 8.26 acres (roughly eight football fields).
95469(b)(2)(A)(3) – Component leak monitoring	Component leak monitoring whether components expected to be under positive or negative pressure	Negative pressure only	
95469(c)(1)- Tagging	Affix weatherproof tag with ID	Allow photographs or other similar electronic recordkeeping	Monitoring equipment already tracks date/time and concentration.
95469(c)(2)- Component leak repair	Must be repaired and remonitored within 10 days	Add exception process	Need exceptions for when special orders or parts/service are needed
95469(d)(2)(A) – Change in gas flow	Document cause of any 3-hr period of operation w/ >20% gas flow	Recommend removal	Excessive data review requirement

95469(e)(1) – Positive pressure	Must correct within 120 days	Include provision where corrective action will take longer than 120 days.	Align with AAAA which provides a process to submit a root cause analysis, corrective action analysis and implementation timeline to Administrator/EO.
95469(g)(1) – Wellhead tuning	Re-tune all wells within a day each time GCS pressure setpoint is changed	Re-tune all wells within 10 days	Not feasible to re-tune entire wellfield in one day.
95470(a)(1)(D) – SEM monitoring data & (a)1)(F) – Component leak monitoring data & (b)(6)(D)	Record time/date of measurements (i.e. each one hertz reading)	Strike reference of one hertz	Monitoring systems measure in five second intervals. Reducing intervals to one second could overwhelm system.
95470(a)(1)(EE) – Calibration records	Record calibration of any instrument that requires calibration under section.	Include list of required instruments.	Recommend including list of required instruments for clarity purposes.
95470(b)(7)(A-B)	Specified actions within 8 days of notification and 5 days of re-monitoring.	Consolidate all reporting in a 30 day report.	Timelines are too tight and will distract from corrective actions. Allow for summary of actions taken within 30 calendar days.
95470(b)(9) – Certification by responsible official	Required for any report or information submitted in LMR.	Require for reports only	LMR contains significant notification requirements. Certifications should only be required for reporting.

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November 10, 2025

Clerks' Office
California Air Resources Board
1001 I Street
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Submitted electronically via online comment docket

RE: WM Comments on 45-Day Draft Landfill Methane Regulation (September 23, 2025)

Dear Quinn,

Thank you for the opportunity to provide comments on behalf of Waste Management of California (WM) in response to the California Air Resources Board's (CARB's) September 23, 2025 Draft Landfill Methane Regulation (LMR, Draft Regulation). WM provides waste and recycling collection, processing, and disposal services under contracts with local jurisdictions across California. The waste and recycling programs we offer are supported by California's network of regional landfills, many of which WM owns and operates.

CARB's LMR is a component of the State's multipronged strategy to reduce GHG emissions in California—as the Initial Statement of Reasons (ISOR) notes, "the purpose of the LMR is to reduce emissions of methane from MSW landfills." [1] When CARB workshopped the Draft Regulation in 2023 and 2024, CARB indicated that the intended scope of the proposed amendments would address the feasibility of further reducing methane emissions from landfills based on the increase in data collected by satellites, revising current operational best practices, and utilizing emerging methane detection technologies. While the Draft Regulation includes amendments with such scope, it also includes significant amendments attempting to address the operation and monitoring of landfill gas collection and control systems (GCCS), which has historically not been CARB's area of jurisdiction.

Landfill capacity is diminishing in California, particularly in the greater Los Angeles region. Recognizing that the State is working towards ensuring that all waste can be managed through recycling and composting infrastructure, there are significant barriers to achieving this outcome in the near term.[2] **California cannot afford to lose any more regional disposal facilities – and avoiding unintended consequences requires ensuring California's remaining landfills be affordable for solid waste ratepayers.**[3]

[1] CARB. 2025a. Public Hearing to Consider the Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills. Staff Report: Initial Statement of Reasons. p. ES-1. September 23, 2025.
[2] CalRecycle. 2025. California's Zero Waste Plan. Draft. September 2025. https://calrecycle.ca.gov/zerowasteplan/.
[3] See discussion of disposal costs as a barrier to resolving illegal dumping across rural, suburban, and urban communities in Alameda County Illegal Dumping (ACID) Task Force. 2025. ILLEGAL DUMPING SOLUTIONS SURVEY FINAL

It is with the interest of achieving this balance between feasibility, cost-effectiveness, asset protection, and a desire to advance innovation that we offer the following comments, which can be summarized as follows:

- **The Regulation must not constrain CARB, sister agencies, and operators to address and manage site-specific conditions associated with SET events.**

- **The Regulation should not require costly additional data collection and reporting unless such data is necessary and useful to diagnosing conditions at the landfill.**

- **The Regulation must not conflict with federal, state, and local landfill regulations that are intended to reduce emissions from landfills.**

- **The Regulation must accommodate the landfill's core functions and best practices for health and safety.**

- **The Regulation should provide a framework for operators to use emerging technologies for purposes of finding and fixing discrete emissions.**

In addition, a summary of comments specific to alignment with relevant regulations and reflecting operational feasibility is provided in ***Attachment A***.

1. Background

a) Existing Regulatory Landscape

Federal, state, and local agencies regulate and permit California's landfills through regulatory regimes that are structured to ensure that the landfills serve their intended purpose of protecting human health and the environment from the effects of solid waste that would otherwise be illegally disposed, dumped, or otherwise mismanaged. Landfills accomplish these environmental objectives through deploying complex systems of engineering controls. These controls include the construction, operation, and ongoing maintenance of gas collection and control systems (GCCS) and leachate collection systems that collect and contain gas and liquids that are generated through the natural decomposition of waste. The GCCS is an interconnected series of gas wells and pipes that

REPORT – 2025. p. 9. https://district4.alamedacountyca.gov/wp-content/uploads/sites/14/2025/10/Illegal-Dumping-Solutions-Report_FINAL.pdf.

extract gas from the waste mass and direct the gas to a control device, such as a flare, for destruction, and/or an energy recovery device, for the generation of renewable energy.

In California, the construction, operation, maintenance, and decommissioning of landfills' GCCS are subject to federal, state, and local laws regulating air emissions. These include, primarily, US EPA's New Source Performance Standards (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAP) and local regulations adopted by each Air District. CARB's existing Landfill Methane Rule regulates some elements of GCCS operation. Most of WM's landfills in California are permitted by the Air District through a Title V permit that incorporates US EPA's requirements. Many Air Districts have memorandums of understanding with CARB to enforce CARB's existing LMR.[4]

A key element of US EPA's program is the recognition that there may be specific conditions at individual wells that may require more time to resolve than is allowed by the rule. The concept of a higher operating value (HOV) has allowed operators to come into compliance and is an important element of the federal program. Agency responsiveness to requests from operators for HOVs is an important element of ensuring that there are feasible pathways to compliance while ensuring appropriate regulatory oversight.

b) Methane Detection Research

WM was the first U.S.-based company in the solid waste sector to have near-term Scope 1 and Scope 2 targets validated by the Science-Based Target Initiative, in line with limiting global warming to 1.5 degrees Celsius. As such, WM is targeting emissions reduction strategies to support a 42% emissions reduction by 2031 and to target beneficial use of 65% of our captured landfill gas by 2027.[5] To support our sustainability goals, WM is engaged in the development of methods to better measure and manage our emissions. WM has welcomed collaborations with various stakeholders to identify feasible improvements in current practices. For example, WM is working with academics, regulatory agencies, non-governmental organizations, and technology providers to evaluate satellite, aircraft, drone, fixed, and portable sensors and analytics that support the future development of a comprehensive landfill emissions detection and measurement system. Although no such comprehensive solution has yet been identified, WM recognizes that emerging measurement technologies may provide meaningful tools to supplement more traditional monitoring methods and to aid in the identification and correction of emission

[4] WM understands these MOUs would need to be updated for Air Districts to enforce the revised LMR.
[5] WM. 2025a. WM 2025 Sustainability Report. https://sustainability.wm.com/downloads/WM_2025_Sustainability_Report.pdf.

events. A summary of our observations is described further in our November 24, 2024 comments.[6]

Ongoing research and evaluation of emerging measurement technologies is critical to determine whether and in what manner various technologies can be relied on for regulatory purposes. WM has been and will continue to be an active participant in research and development initiatives targeting emerging methane detection technologies. WM has hosted several controlled-release events at its closed Petrolia Landfill in Canada, referred to as the Simulation Facility for Landfill Emission Experiments ("SIMFLEX"). SIMFLEX is a 60-acre landfill with 11 computer-controlled point- and area-sources across 20-acres with capacity to emit up to ~840 kg/hr of methane. Through the controlled release events to date, FluxLab, with support from the Environmental Research and Education Foundation ("EREF") has evaluated numerous vendor combinations and methodologies for performance in detecting and quantifying controlled releases of methane during upwards of 71 experiments. NWRA discussed the results of the first controlled release study at SIMIFLEX in response to EPA's recent Request for Information, *Use of Advanced and Emerging Technologies for Quantification of Annual Facility Methane Emissions Under the Greenhouse Gas Reporting Program*, 89 Fed. Reg. 70177 (Aug. 29, 2024). NWRA's response is included as ***Attachment B***.

The second controlled release event took place at SIMFLEX in November 2024. FluxLab focused on the effect of varying weather and wind conditions on measurements in relation to site topography and meteorological influences. The preliminary results are posted on FluxLab's webpage. FluxLab, *Simulation Facility for Landfill Emission Experiments (SIMFLEX)*, https://fluxlab.ca/simflex/ (last visited Oct. 16, 2025). The Final Report for the second controlled release event is under review and expected by end of 2025.

Two additional controlled release campaigns were coordinated at SIMFLEX earlier this year—one from May 12 through 18, and another from June 2 through 15. The first campaign focused on refining the quantification and detection methodologies of eddy covariance towers, UAV-based, vehicle-based, and ground-based systems. The second campaign concentrated on "releasing rates useful for improving satellite- and aircraft-based methane detection technologies," with the objectives of:

[6] WM. 2024. WM comment letter to EPA re: **Docket ID No. EPA-HQ-OAR-2024-0350.** November 27, 2024

- Investigating the impact of area sources on satellite detection capabilities;
- Assessing how weather conditions and atmospheric dynamics influenced satellite-based methane measurements; and
- Examining the relationship between emission rates and spatial distribution in determining satellite quantification accuracy.

The preliminary results are not yet posted to FluxLab's website, but WM will share them with CARB as they become available. FluxLab intends to conduct additional controlled release events in January 2026.

The controlled release events and subsequent data analysis indicate significant improvements with detection accuracy especially with drone technology. Work is also proceeding on developing an open source standard method and procedure for drone surface emissions monitoring with hopes of formal regulatory submittal next year.

In a recently published study by *Krause et al.*, the quantification capabilities of satellite technologies were evaluated across 60 of WM's largest active MSW landfills from 2022 to 2024. *See* Krause et al., *A High Resolution Satellite Survey of Methane Emissions from 60 North American Municipal Solid Waste Landfills*, Envt'l Sci. & Tech. (July 15, 2025). As a result, *Krause* found that the emissions quantified using satellite technologies in conjunction with site-specific factors aligned least closely with the subpart HH quantification methodologies, which were finalized in April 2024 in reliance on the alleged quantification capabilities of satellites. The results of this study provide further support for the contention that additional review and procedures are necessary to ensure that emerging measurement technologies are appropriate tools for the detection and quantification of emissions, and that remotely measured data can be interpreted reliably and consistently. For more information on the results of the *Krause* study and WM's internal analysis of the data collected, see WM's Response to EPA's RFI, EPA-HQ-OAR-2024-0350-0058, attached hereto as ***Attachment B***.

c) Subsurface Elevated Temperature Events

The ISOR refers to a subsurface elevated temperature (SET) event as "a general term used to describe when temperatures of gas withdrawn from the waste mass are found to be above regulatory thresholds."[7] WM's many years of experience in monitoring and correcting conditions at our more than 300 landfills and 30,000 gas wells across the country indicate that it is important to differentiate between two circumstances leading to

[7] CARB 2025a, p 126

elevated subsurface temperatures within a landfill: 1) near-surface subsurface oxidation (SSO) events that, if unmitigated, can lead to subsurface fires, and 2) what the ISOR describes as "a heat-releasing chemical reaction deep within [a] landfill,"[8] which industry has traditionally referred to as "elevated temperature landfills," or ETLFs. The characteristics of these events are different and need to be managed as such.

The design of federal, state, and local regulations related to temperature thresholds has stemmed from control of SSOs, because these events have occurred for a longer period of time within the industry and are a predictable occurrence of normal landfill operations. ETLFs are rare but can result in serious consequences, as described in the ISOR, if not managed properly.

WM experienced a large ETLF at one of our landfills on the East Coast in 2015, around the same time our competitors were first seeing these events occur. As ETLFs hadn't been experienced up to that time, WM partnered with academic experts to study ETLFs to determine appropriate monitoring, management, and prevention strategies. As a result of external and internal research,[9] WM routinely monitors parameters that have been observed in association with ETLFs, takes proactive measures at facilities exhibiting characteristics that could result in an ETLF, and deploys management activities at confirmed ETLFs.

Two of our most important findings bear on the design of the Draft Regulation:

- We have been actively managing the first ETLF WM experienced back East for the last decade. Parameters defining the event have stabilized over time; however, **temperatures are still elevated 10 years later**.
- Preventing the spread of the reaction area relies upon aggressive removal of gas and liquids from the area. **Regulatory approaches that incentivize or require wells to be turned off run directly counter to preventing spread of a reaction through a landfill**.

ETLFs are a relatively new phenomenon within the industry, and because they are quite rare and occur deep within the waste mass, they are more difficult to study relative to other landfill conditions. As far as WM is aware, we are the only landfill operator with an active research program dedicated to ETLFs; likewise, there are only a handful of academics who have worked on ETLFs. The limited published research on ELTFs should demonstrate that

[8] Ibid

[9] See ***Attachment C*** for a list of published works WM has utilized.

we do not definitively understand everything about these events.[10] Regulatory design should reflect this uncertainty by not presuming cause and effect.

WM is aware that the SET expert cited in the ISOR believes that preventing SSOs can prevent ETLFs. WM notes that we dispute the premise that SSOs cause ETLFs, given that these events occur at depths where oxygen would not reach, as oxygen would have been expended nearer the surface. Regardless, WM believes that both SSOs and ETLFs need to be prevented. We believe we share consensus with regulators on the following:

- Landfill operators should prevent and fix oxygen intrusion.
- Landfill operators should maintain sufficient gas collection and control capacity.
- SSOs can and should be corrected within several months—although allowances need to be made for unique circumstances, as contemplated in the federal regulations.
- Trends consistently showing large temperature jumps indicate conditions that need further investigation. Regulators need to be aware that these trends are being observed.
- Wellhead temperature readings between 131-145F do not necessarily indicate abnormal conditions. Trends are more important, as are other parameters like gas quality. As stated in the ISOR:

  > "Thalhamer et al. (2025) suggests that an elevated landfill gas temperature (between 131 and 145°F) that is sustained but stable (not increasing) and exhibits no other indicators of a reaction (e.g., low carbon monoxide, and stable gas composition) may be lower risk of further increasing temperature than a well that increases in a matter of weeks but has not surpassed 131°F."[11,12]

- If there are consistent readings showing wellhead temperatures 160-170F with inhibited methane production (methane/carbon dioxide ratio of less than 1) and physical indicators like settlement, a more comprehensive, multiagency approach is warranted to ensure that the appropriate actions are being taken to prevent the conditions that the ISOR describes on page 126. This includes drilling gas wells

[10] As further evidenced by the limited citations presented in the ISOR's justification for the wellhead monitoring parameters.

[11] CARB 2025a p. 66

[12] WM does not agree that temperature changes resulting in wellhead temperatures below 131F should be cause for alarm, nor that changes should be monitored weekly unless wellhead temperatures are 160F+. We agree that directional changes are more important than absolute values.

deep enough to reach a potential subsurface reaction area, which requires specialized training, equipment, and safety protocols.

It is with the spirit of ensuring the proper management tools are available for both SSOs and ETLFs that WM provides its comments on the wellhead monitoring requirements that have been added to the Draft Regulation.

2. Regulatory Amendments

a) The Regulation must allow for a pathway for deep subsurface chemical reactions to be managed.

The Draft Regulation is focused on the prevention of situations that could adversely affect the GCCS. As noted in the ISOR, "the LMR is not designed to, nor could it, eliminate SET events, the measures staff proposes in the LMR require intensive monitoring and proactive responses to changing conditions to ensure proper maintenance of the GCCS."[13] While we believe significant amendments are needed to those sections of the Draft Regulation to meet this stated objective, we agree that the LMR should be focused on *prevention*, rather than *remedy*. But it does not appear that there is any mechanism to transition from the LMR prevention regime to a management regime, should a deep subsurface chemical event occur despite regulator and operator efforts at prevention.

It is critical that landfill operators have the ability to manage the site-specific conditions that would occur with a deep subsurface chemical reaction, focused on management approaches that have been demonstrated to succeed, which, in many cases, would be hindered by the actions required by the LMR. For example, one of the management strategies WM has relied on is to drill many more wells—in some cases, four times as is typical – to form a barrier around the reaction and aggressively remove liquids and gas. These wells are all intentionally in the "hotter zone" of the waste, so they would likely exceed the temperature thresholds in the Draft Regulation. The wellhead monitoring requirements that are contemplated at those temperatures would interfere with, or prevent, these activities when they are most needed.

We do not think the LMR is designed to dictate management of these events, as no framework is provided that recognizes the extent of management needed or timelines known to be required for these types of events (years, not months). As such, the Draft Regulations should allow the Executive Officer to authorize a corrective action pathway for

[13] CARB 2025a p. 126

confirmed deep subsurface chemical reactions that would be overseen by CalEPA and its relevant boards and departments, including CARB. The Regulation could require regular reporting of progress to the EO as part of this corrective action pathway so there is maximum transparency into how the event is progressing.

b) The proposed wellhead monitoring requirements need to be revised to ensure appropriate oversight without punishing good actors and unnecessarily increasing costs to solid waste ratepayers.

The 45-Day package is the first time that stakeholders are seeing the proposed language on wellhead monitoring. WM understands that CARB is intending to impose more stringent monitoring requirements for the purposes of detecting, preventing, tracking, and correcting conditions characterized by higher temperatures. However, the Draft Regulation's wellhead monitoring requirements would create sisyphean tasks unnecessary to accomplish CARB's objectives. These would stack on top of what is already a(n overly) complicated web of federal, state, and local regulations – which, unless aligned, would all have different timelines for completion and standards of success. The ISOR has not provided sufficient justification for why these misalignments are necessary.

Having designed programs to monitor the tens of thousands of wells across our national landfill network, WM knows from experience that the frequency and type of wellhead data sought is not necessary to achieve the objectives of tracking potential SSO or SET events. The structure of monitoring program seems to suggest that – by providing a more rigorous regime for wells with repeat temperature or oxygen exceedances or positive pressure detections – operators failing to correct repeat issues will be subject to more oversight. WM does not disagree with this in concept; however, wellhead conditions that are not actually indicative of a more serious temperature issue should not be subject to the same punitive monitoring requirements, and CARB must recognize the conditions that do reflect a persistent issue.

Moreover, the monitoring provisions as proposed will impose unnecessary costs to both operators and the regulatory agency with oversight requirements, be that CARB or the Air District. WM anticipates that our workforce to conduct this work in the field and to analyze data could increase two- to fourfold, depending on the site. WM estimates that the costs to hire third-party contractors to do the field work ranges from $60-100/hr (CARB's Economic Analysis assumed $59/hr).[14] The costs of implementing the Draft Regulation will be incorporated into disposal rates for individual landfills, which are in turn paid by

[14] CARB. 2025b. Appendix B: Economic Analysis. Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills. September 23, 2025.

commercial/industrial customers, waste haulers contracted to jurisdictions, and/or local municipalities, who set waste and recycling rates paid by residents and businesses that incorporate the costs of disposal.

To arrive on a cost-effective regime, WM encourages CARB to revise the wellhead monitoring provisions to:

- Measure trends of temperature and gas constituents over periods of time and within adjacent, rather than individual wells, to allow for statistically significant trend analyses indicating degraded methanogenesis and to prevent requiring corrective action based on anomalies;
- Better align with existing regulatory requirements that require the same work;
- Significantly reduce the amount of downwell gas monitoring prescribed; and
- Allow for applications to the Executive Officer for extended time periods for individual wells.

i. Suggested Revisions to Wellhead Temperature Provisions

With respect to wellhead temperature, Section 95469(e)(3) of the Draft Regulation prescribes significant investigative and corrective requirements following a wellhead detection above **131° F.** Setting the compliance threshold at 131F significantly deviates from existing practice, which requires progressive monitoring at wellhead temperatures of 145F and 160F, and could bring in many more wells (and landfills) than are currently subject to NESHAP's enhanced monitoring.

In promulgating the NESHAP regulations applicable to MSW landfills,[15] US EPA stated that "[t]he purpose of wellhead temperature monitoring is to prevent fires and avoid conditions that inhibit anaerobic decomposition of the MSW" and therefore "chose 145 °F because it is high enough to provide flexibility to MSW landfill owners and . . . is low enough to promote efficient anaerobic decomposition and is protective enough to prevent fires and not damage GCCS equipment."[16]

US EPA then revised subparts XXX (NSPS) and Cf (EG) to reflect the higher temperature standard, allowing "landfills affected by the NSPS and EG" to "demonstrate compliance with the 'major compliance provisions" of subpart AAAA "in lieu of complying with the analogous provisions in the NSPS and EG" to allow landfills to "follow one set of

[15] *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills Residual Risk and Technology Review (Proposed Rule)*, 84 Fed. Reg. 36670, 36691 (July 29, 2019).

[16] *Summary of Public Comments and the EPA's Responses for the Proposed Risk and Technology Review and Amendments for the Municipal Solid Waste Landfills NESHAP*, at 6-3--, 6-4 (Mar. 26, 2020), EPA-HQ-OAR-2002-0047-0143.

operational, compliance, monitoring, and reporting provisions for pressure and temperature."[17] US EPA expected, and it has been the case, that the revisions "reduce[d] the number of requests and burdens associated with submitting and reviewing the requests for higher operating values (HOVs) for temperature, as well as reduce[d] the frequency of corrective actions for exceeding the temperature limit."[18]

On this basis, wellhead temperatures of 131°F should not trigger the investigative and corrective actions that the Draft Regulation would require. A wellhead temperature threshold of 145°F threshold would be an appropriate trigger for GCCS and cover integrity assessments. Once these assessments have been completed, and if the temperature cannot be reduced within the agreed period, enhanced monitoring could be initiated to further evaluate the occurrence. However, initiation of these assessments or enhanced monitoring should be the result of data gathered over a 90-day period encompassing multiple measurements.

To better evaluate whether a SET event is occurring, CARB should impose more stringent monitoring requirements when the following conditions are present within a discrete area, based on data collected over two consecutive quarters:[19]

- Two or more immediately adjacent wells demonstrate:
    - average wellhead temperatures of 145° F or greater and
    - average CH_4/CO_2 ratio less than or equal to 0.9
- Differential settlement
- Presence of cracks and fissures

Only when wellhead temperatures are equal to or greater than 145°F and a methane to carbon dioxide (CH_4/CO_2) ratio less than or equal to 0.9, should the facility begin enhanced monitoring, including weekly well readings of O_2, CO_2, CH_4, and CO, and evaluating whether physical observations (smoke, etc.) are occurring, consistent with the NESHAP.[20]

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[17] *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills Residual Risk and Technology Review*, 85 Fed. Reg. 17244, 17248 (March 26, 2020).
[18] *Ibidd.*
[19] Two quarters worth of data is necessary to assess the underlying factors driving the conditions at elevated temperature wells and, thus, how to properly manage the wells (i.e., whether to shut the wells off or increase draw on the wells).
[20] *Summary of Public Comments and the EPA's Responses for the Proposed Risk and Technology Review and Amendments for the Municipal Solid Waste Landfills NESHAP*, at 7-1 (Mar. 26, 2020), EPA-HQ-OAR-2002-0047-0143.

If a wellhead temperature exceeds 160°F and has a CH_4 to CO_2 ratio of less than 0.9, the facility should be required to monitor and determine if the elevated temperatures are expanding to include physical observations. Two quarters of well-field data should be trended to determine optimum landfill gas collection. Since the balance gas concentration typically includes some percentage of hydrogen, speciation will be necessary. Once the hydrogen concentration is determined, the elevated temperature well should be tuned to a maximum of 10-15% balance gas (typically assumed to be Nitrogen). If the wellhead temperature increases to equal or greater than 170°F the facility should be required to perform a 24-hour notification in accordance with NESHAP.

Lastly, wellhead temperatures should be used for compliance purposes, rather than any temperature within a well. WM would rather discuss a more robust framework based on wellhead temperatures than rely on extensive downwell temperature monitoring for the reasons described below.

A. Concerns with downwell temperature monitoring

WM believes CARB should reduce the instances in which downwell temperature monitoring is required, given operational concerns and the availability of alternative approaches. Firstly, downwell temperature monitoring disrupts operation and poses safety concerns. Most downwell temperature monitoring would be conducted by technicians in the field (installing temperature probes in the number of wells the Draft Regulation contemplates for evaluation would be prohibitively expensive, as they are tens of thousands of dollars each, depending on the depth). These activities vent landfill gas (including methane) to the atmosphere and disrupt the operation of the well. This runs counter to the stated purpose of the LMR.

Secondly, gas flow within the wells makes it impossible to determine the “origin” of heat, taking downwell temperature measurements every 10 feet will not allow CARB or an operator to find the “hot zone” that may be of concern. Waste temperatures, as measured from boring logs obtained during new well drilling, would be more diagnostically appropriate.

NESHAP requires annual downwell temperature monitoring for wells with wellhead temperatures at 165F or above. The Draft Regulation could require downwell temperature monitoring every two years for wells with wellhead temperatures 145-165F and/or the installation of temperature probes within select areas of concern, in coordination with the operator. Monthly downwell temperature readings are not warranted under any condition.

Finally, the carbon monoxide ("CO") monitoring requirement to use Method 10 is not technically feasible. The EPA approved two alternative methods (ALT153 and ALT 154), which are based on laboratory sample analysis, impose a tremendous administrative burden and lag time with no corresponding benefit when compared to the much more practical field-based stain tube methodology. First, there are few labs that perform ALT 153 or ALT54; we are only aware of one in Southern California. Second, landfill gas collected in tedlar bags is classified as hazardous material and cannot be shipped per Department of Transportation regulations; essentially preventing access to the laboratory for most sites. Third, the lag time for laboratory analysis of CO samples is often greater than two weeks. Fourth, the labor and lab costs for extracting weekly samples at well greater than 131F will be excessive; WM already has one dedicated technician for a single site just to manage the NESHAP enhanced monitoring for CO at 145F. If all wells across WM's California sites with readings at or above 131F require CO readings, it will quadruple WM's labor needs and costs where finding technicians is already strained market. Also given the DOT shipping restrictions and limited lab services available, meeting the CO sampling and analysis requirements will not be technically or economically feasible.

A more effective alternative would be to retain the federal threshold of 145F and to allow the use of stain tubes to avoid reliance on the lab for analysis and reduce costs. Stain tubes provide instant feedback to GCCS operators in order to make immediate adjustments to the system to address high CO readings.

ii. Wellhead Pressure Provisions

The Draft Regulation should include an alternative timeline provision for those instances in which corrective action will take longer than 120 days. This would align with AAAA which provides a process to submit a root cause analysis, corrective action analysis and implementation timeline to Administrator/EO.

The Draft Regulation would subject landfills with three recurring positive pressure readings at a wellhead during a 12-month period to perform a collection system assessment "in a 200-foot radius around the well" and "correct any issues discovered[.]" Section 95469(e)(2)(A). Operators would also be required to monitor the wellhead pressure on a weekly basis for one year and may revert back to monthly monitoring where positive pressure is detected during no more than 15% of the weekly monitoring events.

CARB has not explained its rationale for requiring assessment within a 200-foot radius, especially where the wellhead pressure has already been corrected. Moreover, the requirement to "correct any issues discovered" is vague and subject to overbroad interpretation. CARB should revise this provision to require assessment of the area within a

5-foot radius of the well, consistent with provisions in other states' landfill methane rules. In addition, CARB should remove the language to "correct any issues discovered" and instead require operators to conduct corrective action in accordance with the wellhead monitoring provisions in Section 95469(e)(1).

In addition, CARB should remove the requirement to conduct weekly monitoring for an entire year because it is overly stringent and not necessary to identify and implement the repairs necessary to prevent positive pressure readings.

iii. Wellhead Trends

WM agrees with using trends and thinks the regulation should rely on trends rather than absolute values or discrete, one-time measurements. However, we are unclear as to how CARB arrived at the trend thresholds established in the rule. As discussed elsewhere, this is an evolving area of research that warrants further discussion amongst researchers and industry before deciding on values that trigger enhanced monitoring and downwell temperature monitoring. Trends should mean changes over multiple monitoring periods, not one instance of change. Enhanced monitoring should only be required if the jump in temperature occurs over quarters, rather than months, and should not be required for wells below 131F. WM requests CARB hold a workshop to discuss parameters and trends to monitor for wellhead monitoring before finalizing them in regulation.

iv. Gas Collection System Pressure Monitoring

Under Section 95469(g) of the Draft Regulation, operators would be required to record the gas collection system gauge pressure on the vacuum side of the blower every 15 minutes and establish a pressure setpoint.

Each time the pressure set point is changed, operators would be required to re-tune all wells within one calendar day. At many large landfills, there are upwards of 480 wells—it would be impracticable, if not impossible, for operators to be able to re-tune all of them within one calendar day of pressure set point change, especially in circumstances where unplanned events trigger set-point reset. There are three general categories of unplanned events that might trigger set-point reset. First, there are short term events, such as vacuum line tie-ins, flare/blower maintenance, sump cleanouts, or carbon vessel changeouts. At large sites, these situations may occur up to twice a week. Second, there are long-term events such as equipment failure, clogged header systems, wellfield upgrades, flare refractory replacement, carbon vessel repairs, or weather events. These situations may occur once a quarter at larger sites. Third, there are unplanned events resulting from coordination with renewable natural gas plants or flares. Where these unplanned events are occurring, operators must focus their attention primarily on resolving the issue. In any event, mobilization of gas technicians cannot reasonably be expected to occur within 24 hours. Accordingly, CARB should provide operators with at least 5 calendar days.

To comply with the requirement to record gauge pressure every 15 minutes, operators would need to install automated wellheads, which may cost up to $4,500 for the automated sensor per well, $100 per well to maintain the data documentation dashboard, and $1,000 per well for annual calibration. At a landfill with 150 wells, installation would cost roughly $850,000 plus tax and design cost. CARB has not identified the emissions reductions that would result from this provision and therefore has failed to establish that these requirements would be reasonable.

v. Well decommissioning procedures must be revised to minimize risk of SSO events.

Section 95464(c) of the Draft Regulations provides that a well may be decommissioned if (1) the methane content exhibits a long-term declining trend (at least 60 months) and is below 20% by volume; and (2) the full radius of influence of the decommissioned well is covered by the radii of influence of other wells such that active gas extraction is maintained in the area.

Limiting well decommissioning to wells experiencing 60-month decline in methane content will be problematic for several reasons. First, enclosed flare control devices require 30% methane to function continuously. If methane content is below 30%, the flare will need supplemental fuel to operate, which will result in emissions not contemplated by CARB. Second, wells with declining landfill gas will need to be decommissioned sooner than 60 months to avoid oxygen intrusion where gas quality is especially low. Operators should be able to make a site-specific determination as to whether decommissioning is warranted prior to 60 months, especially if doing so would prevent SSO and SET events. Moreover, CARB has not provided any evidence that it is necessary to ensure that the full radius of influence of the decommissioned well is covered following decommissioning.

c) Methane Emission Detection and Control

i. Use of satellite detections should be limited to a find-and-fix program that sets forth technology standards and corrective action timeframes that ensure that detections are accurate and addressable.

WM agrees with CARB on limiting application of satellite detections to high level screening for potential landfill emissions given the current accuracy and reliability of its detection capabilities. Use of satellite data for leak detection purposes is directionally acceptable, but we encourage CARB to re-consider the field validation and reporting requirements and timelines. The Draft Regulation should strengthen the entrance criteria for remote sensing technology under 95469(b) to ensure that emissions detections are accurate. The barrier is low in the proposed rules; only spatial resolution, data availability and plume visualization are considered. The technology should have proven point of detection for landfill application of 90% or better based on participation in a controlled release study for use as a regulatory compliance requirement. We understand CARB has conducted its own studies and WM participates in CARB's voluntary "find and fix" landfill program. We encourage CARB to work with industry stakeholders on a reasonable and workable solution as we transition from a voluntary program to incorporating remote sensing in the LMR.

In promulgating a remote detection program that is practicable and feasible, CARB must recognize the complexity of accurately and reliably identifying actionable emissions from MSW landfills. Many of these challenges including differences from oil and gas facilities are outlined in WM's comments on EPA's Request for Information (2024).[21]

In summary, landfill gas is highly variable in its generation rate and characteristics, depending on the operational phase of the landfill. This is exacerbated by the fact that construction is nearly constant during the course of a landfill's existence. To provide uninterrupted essential public services, new cells must be built to accommodate expected waste, while existing cells must be filled, and older cells must be closed. As a result, topography is constantly changing, rendering the circumstances under which landfill gas may be released or escape at MSW landfills likewise variable and complex. Unlike oil and gas facilities, topographic challenges may create above-the-surface fugitive gas migration features that are not well understood or identified via remote satellite measurement, and may not necessarily reflect acute operational releases. Unlike a leak at an oil and gas facility, the possible sources of methane at a landfill are difficult to pinpoint with accuracy, and are affected greatly by diurnal and atmospheric factors, which limits the ability to "find and fix" such emissions on a contemporaneous basis.

Accordingly, given that landfill emissions can be highly complex and variable in site-specific weather conditions and topography, detection location and magnitude can be equally complex and uncertain. In WM's experience with remote sensing over past several years, we cannot always accurately pinpoint or even locate the source of the plume detection. Where a leak cannot be validated, there will be no corrective action deployable and this should be an acceptable compliant response to the agency.

[21] NWRA 2024, pp 3-5, 11-17

Based on our experiences with remote satellite monitoring we provided several suggestions for revising the rule:

A. Applicability for GCCS installation or decreased operation or system removal

A detection above the SEM threshold conducted in response to a remote detection should not trigger GCCS installation or be used as a prohibiting criterion for semi-continuous operation or conditional permanent shutdown under 95463.

Uncontrolled landfills that are otherwise exempt from SEM requirements should not be required to conduct SEM over the entire surface of the landfill in response to a remotely detected plume. CARB should retain its voluntary validation and notification program for uncontrolled MSW landfills that receive a satellite detection as has been done in the past.

B. Surface Emissions Monitoring and Reporting

The proposed 600-foot by 600-foot (roughly 8.3 acres) field validation area and timeline to respond to the agency for each observation is excessive, especially when the site is required to follow 25-foot spacing for SEM and also perform component leak monitoring.

Where an exceedance of the SEM and/or component leak threshold is monitored, then the site must initiate corrective action and re-monitor within 10 days. The timing of implementing and completing corrective actions under the existing regulatory schemes is already variable and complex—to add another layer monitoring and multiple tiers of reporting as it relates to these types of events would further delay response efforts and should therefore be carefully contemplated.

Due to the extent of monitoring required for each remote sensing investigation, and likely reliance on third party vendor availability to conduct the initial and/or follow-up monitoring, CARB should limit the area of investigation to no more than 100-meter radius.

Moreover, CARB proposes to send notification of the detection to operators within seven business days of CARB's receipt. However, CARB does not require certified remote technology vendors to notify CARB of a detection within any timeframe. Operators must be notified as soon as possible of a detection and be given sufficient time to investigate and correct leaks, as needed. This lack of timeframe may render operators unable to fix, or even detect, the relevant emissions. By the time the operator receives the notice, the emissions event may have ended. Even hours after a monitoring campaign is complete, there may be no evidence of an emissions release through the cover in the detected area. This proposed framework is likely to result in significant wasted time and effort with no environmental benefit. CARB should be notified within one business day of a detection, and CARB should then provide notice to the operator within one business day, in order to facilitate operators' meaningful investigation.

CARB should also revise the timeline for operators to complete the remote sensing field validation in 95469(b)(2)(A) from 5 days to at least 30 days and remove the re-monitoring requirement to instead rely on the routine quarterly SEM and leak component checks. CARB should also consolidate the remote sensing reporting under Section 95470 (b)(7) with quarterly reporting under Section 95470(b)(4) to streamline the reporting process without limiting the data submitted. This would also allow sites more reasonable time to investigate and remediate, where applicable, without distraction of multiple monitoring and reporting steps and timelines.

Further, CARB should consider limitations to investigate detections that are outside of operators' control, including weather conditions, labor availability, and unsafe areas.

C. Remote Monitoring Technology Providers – Criteria for Program Entry

CARB must also increase the stringency of capabilities required of remote sensing technologies. While Section 95469(b)(1)(A) would require (1) spatial resolution of at least 30x30 meters; (2) transmission of data to CARB within 72 hours of detection; and (3) the ability to create a visualization of the plume, these requirements are not enough. CARB should instead require the following in order for a technology to be approved:

- Ability to provide latitude and longitude coordinates where emissions appear to be originating from.
- Ability to identify and localize methane emissions that originate from a specific location or area at an MSW landfill.
- Demonstrated past performance of methane emissions detection from MSW landfills with accessible data in the public domain.
- Ability to quantify methane emission rates and their uncertainties using established methodologies and publicly available quality assurance and quality control protocols.
- Ability to detect methane emissions without physical access to the MSW landfill.
- Evaluation of the accuracy and performance of a technology through controlled release testing at an MSW landfill.

ii. CARB must allow for technology innovation by employing a streamlined process to review and approve use of alternative technologies in a timely manner.

It is imperative that CARB, the solid waste industry, and other stakeholders understand the appropriate uses and limitations of emerging measurement technologies. Such technologies should be as accurate and reliable as possible before implementation into the LMR updates. However, CARB should not restrict advanced measurement procedures but rather promote a pathway for alternatives that incentivizes innovation and encourages research and development that would lead to more use application and increased reliability of alternative technologies.

WM supports the use of advanced technologies as alternative SEM procedures in Section 95471(e), but requests that CARB create a wider pathway to facilitate greater use of emerging technologies and not limit use as just a screening tool.

Drone technologies have made significant improvements in accuracy and reliability of leak detection through participation in the controlled release studies at SIMFLEX. During the first controlled release study in 2023, UAV Column Sensor Emission Assessment (UCSEA) vendors had a combined 90% probability of detection (POD) (the smallest emission that can be detected > 90% of the time) rate of 60-80 kg/hr. **In 2024, UCSEA vendors had a 90% POD of 5.7 kg/hr, much improved from 2023**.

These vendors continue to work with industry, academics, and regulators to develop an open-source, standardized methodology for regulatory SEM application in Canada. Additional controlled release initiatives were performed at SIMFLEX in 2025 including SEM walking path comparison to drone technologies, though results are not yet publicly available. We anticipate a proposed alternative SEM approach in Spring 2026.

CARB should work with stakeholders to create a more streamlined review and approval process of advanced technologies for alternative monitoring methods and procedures. The proposed rule limits alternative to just a screening approach. This is short sided of the agency, especially given the rapid development of drone application. Section 95471(e) should be allow for other innovative alternatives to surface emissions monitoring requirements such as replacement option to Method 21 – potentially eliminating the requirement for ground validation of instantaneous and penetration readings. Leak component inspections and repairs could possibly benefit from use of advanced technologies.

As part of the streamlined review and approval process, WM requests that CARB impose a deadline of 120 days to review and approve operators' use of technologies to comply with the SEM provisions of the Rule. If, after 120 days, CARB does not approve, disapprove, or request additional information, the request should be deemed approved. Moreover, if operators do not receive a response within 120 days and proceed to implement an alternative compliance option that is subsequently approved, operators should not be considered in violation of the Rule prior to receiving approval. This is particularly relevant for the purposes of monitoring unsafe-to-walk surface areas using alternative technologies; as recommended by WM below, technologies utilized for that purpose should also be subject to a request, review, and approval process to ensure that the technology being used is accurate and standardized.

CARB must also remove the criterion to demonstrate methane emission reduction equivalency. Such equivalency demonstration is neither technically feasible nor appropriate. Standard Method 21 does not measure, quantify or reduce emissions; it monitors methane concentration. Alternative methods also will not serve to quantify emissions reductions, and so there is no mechanism to compare emission reduction equivalency.

Broadening the applicability and streamlining the review and approval process for both SEM and other compliance alternatives would practically and feasibly facilitate a more rapid incorporation of emerging technologies into the compliance obligations in reliable manner and reduce compliance costs and labor hours.

iii. Operators should not be required to monitor unsafe areas until CARB has approved alternative SEM technologies.

The Draft Regulation provides that "unsafe-to-walk surface areas" that cannot be monitored using the methodology outlined in Section 95471(c) must be monitored using an alternative SEM procedure under Section 95471(d) within the same calendar quarter. *See* Section 95469(a). CARB proposes to prescribe several "instrument requirements" on the alternative monitoring technology that can be used for this purpose, including the requirement to record sampling data at "a frequency of at least one hertz." 95471(d)(2)(C). This requirement is inappropriate and technically infeasible because one second intervals would flood both operators and CARB with immense amounts of data with no additional benefit in terms of emissions reductions. Accordingly, WM requests that CARB revise the requirement to reduce the frequency to five seconds.

CARB lists three examples of alternative technologies that can be used for this purpose: (1) a handheld instrument that measures methane column concentration between the user and a point on the landfill surface where the instrument is aimed; (2) a drone-mounted instrument that measures methane column concentration in a downward-facing direction; or (3) a rover-mounted instrument that measures methane volumetric concentration near ground-level. As noted above, WM understands the value of utilizing alternative monitoring technologies to conduct SEM, subject to additional research and development, particularly in order to comply with the approval process under Section 95471(e). It is not clear if, and if so, why the requirements for alternative technologies to use for the purpose of evaluating unsafe-to-walk surface areas is distinct from that of alternative technologies to use for SEM.

Regardless, the technologies suggested by CARB require additional research and development to ensure that they can operate in a standardized, reliable manner. Operators likely will not be able to comply with the requirement to monitor unsafe-to-walk surface areas using these technologies by the effective date of the revisions contained in this Draft Regulation.

Accordingly, CARB should impose the same technology review and approval process for the purposes of monitoring unsafe-to-walk areas under Section 95471(d) that it does for alternative SEM technologies under Section 95471(e). CARB must also delay the requirement to utilize alternative technologies to monitor unsafe-to-walk surface areas until a point in the future, such as July 1, 2027, to ensure that both the technologies are ready for regulatory use, and that CARB has had ample time to review them for their ability to comply with the requirements under both Sections 95471(d) and (e). Until then, CARB should exclude unsafe-to-walk surface areas from quarterly SEM, to preserve the safety and wellbeing of landfill technicians conducting SEM in accordance with Section 95471(c).

iv. The Working Face should be excluded from SEM until it is safe to monitor.

The Draft Regulation would exclude the working face area from SEM obligations under Section 95471(c)(1)(A) for the first 180 calendar days after the initial waste placement at that location and so long as active filling and compacting operations are ongoing. However, this exclusion does not account for the fact that where filling and compaction operations continue past 180 days after initial waste placement, the area will not be safe to monitor immediately upon cessation of filling and compaction operations. CARB should instead provide operators until cessation of filling and compaction in an area has ceased to require SEM.

v. SEM corrective action timeframes should align with existing response timeframes that account for operational realities.

The Draft Regulation would require operators, upon detecting surface emissions above the instantaneous or integrated thresholds, to initiate corrective action within 3 calendar days and complete corrective action within 10 calendar days. The location of the measured exceedance must be re-monitored within 10 calendar days—if a second detection above the threshold is apparent, the same timeline for corrective action applies. If a third detection above the threshold is detected, operators must install a new or replacement gas collection well or device within 120 calendar days of the initial exceedance or utilize an approved alternative under Section 95469(a)(3). *See* Sections 95469(a)(1) and(a)(2).

The Draft Regulation should be revised to be consistent with the federal rules. The federal rules require that "[c]over maintenance or adjustments to the vacuum or the adjacent wells to increase the gas collection in the vicinity of each exceedance must be made and the location must be re-monitored within 10 calendars days[.]"[22] The requirement to "initiate" corrective actions within 3 calendar days is unnecessary and confusing, and detracts from operators' ability to correct detections with site-specific considerations in mind.

Moreover, CARB would impose the same windspeed and precipitation requirements as quarterly SEM events on SEM re-monitoring events—specifically, an average windspeed limit of 5 mph or instantaneous limit of 10 mph and allowing SEM only where there has not been measurable precipitation in the preceding 72 hours. *See* Section 95471(c)(1)(D). It is difficult for operators to ensure that third-party consultants are available for SEM re-monitoring especially if CARB is to impose additional requirements such as windspeed and precipitation that are outside of the operators' control. CARB should therefore remove windspeed and precipitation requirements from re-monitoring obligations.

vi. GCCS downtime provisions should account for practical realities faced by landfills.

GCCS downtime events may result from unplanned circumstances such as weather events, earthquakes, wildfires, or equipment malfunction. Other circumstances warranting shut down include system and equipment maintenance (to minimize unplanned equipment failure), or low gas quality triggering semi-continuous operation. The proposed 120-hour limit of downtime under Section 95464(b)(1)(A), therefore, does not properly account for the realistic amount of downtime that GCCS across regulated landfills that will be necessary on an annual basis. The limit should be removed or revised to allow for 240

[22] 40 CFR § 60.765 (c)(4)(iv); 40 C.F.R. § 60.36f(c)(4)(iii).

hours of total system downtime, consistent with Bay Area Air District's rule 8-34, and the exceptions listed under Section 95464(e) should apply to the total system as well as individual components.

The Draft Regulation would also require operators to close all valves in the gas collection and control system contributing to venting of the gas to the atmosphere "immediately" in the event that the GCCS is not operating. GCCSs are equipped with automatic closure devices, that are programmed to close valves as soon as possible. However, it is not clear whether valve closure would happen "immediately" even where automatic, because "immediately" is not defined. CARB should provide operators with a clearer obligation, such as one hour, that allows for site-specific configurations and acknowledges the dynamic nature of GCCS. Moreover, a one-hour period is consistent with the federal rules and is sufficiently protective.[23]

vii. Early gas collection requirements must provide greater flexibility.

Section 95464(a)(5) would require operators to install either horizontal collectors or caisson wells in areas of "new waste placement," and begin operating the components once 15 feet of waste has been placed and positive pressure is detected. While WM recognizes the benefits of earlier gas collection, there are practical limitations to doing so that the Draft Regulation should account for.

For example, the proposed requirements would necessarily trigger horizontal or caisson well installation at the working face, which presents safety concerns in light of active waste placement and traffic. There are other options for early collection that would alleviate these concerns and be more beneficial over a longer period of time, including utilizing the leachate collection and control system, or installing collection layers in bottom lines using shallow vertical wells.

In any event, efficient early collection is dependent on a host of factors, but primarily on waste composition and age. CARB should establish the deadline to install and operate GCCS to be consistent with the time period in which waste decomposition will occur and begin to generate methane. For example, landfills with an annual waste acceptance rate below 300,000 tons per year could be required to install GCCS in areas where waste has been in place for 36 months. At landfills with an annual solid waste acceptance rate of 300,000 tons per year or more, operators could be required to install GCCS in areas where waste has been in place for 24 months. In addition, gas collection should become operational following the detection of at least 30% methane in two consecutive samplings of landfill gas. These timelines would result in greater likelihood of initiating collection and

[23] 40 C.F.R. 60.763(e); 40 C.F.R. 63.1958(e)(1)(i).

destruction of landfill gas that is of sufficient methane content so as to allow for continuous operation of the system without the need for supplemental fuel. Use of supplemental fuel would result in greater emissions not contemplated by CARB, and generally is an indicator that landfill gas is not at the volume or quality necessary to support continuous active gas collection.

Accordingly, CARB should revise the Draft Regulation to impose early collection deadlines based on solid waste acceptance rates, age of waste, and landfill gas quality to ensure that the GCCS can operate in a manner most efficient for emissions reduction purposes.

viii. The control device monitoring provisions do not serve to reduce emissions and are infeasible.

Section 95459(d)(2)(A) would require operators to record the gas flow rate to each gas control device at least every 15 minutes. If there is any 3-hour period of operation during which the total gas flow rate changes by more than 20% over the average in the prior 12-month rolling period, the cause must be reported in the Annual Gas Collection and Control system Report.

Similarly, the combustion temperature of enclosed flares must be monitored every 15 minutes, and any 3-hour period during which the average temperature difference was more than 28 degrees Celsius below the average combustion temperature during the most recent source test is an exceedance of the combustion temperature. Section 95469(d)(3)(A).

Likewise, under Section 95469(d)(4)(A), the oxygen content and temperature of the exhaust gas stream of internal combustion engines and gas turbines must be recorded every 15 minutes. If there is any 3-hour period of operation during which the average oxygen content or temperature is outside the range of the manufacturer's specifications, it will be considered a violation.

For each of these provisions, CARB has failed to explain the purpose and goal of the monitoring requirement, the emission reduction objective it would serve, how the 3-hour period was chosen, and why the same goal cannot be achieved using a longer time period, such as one day or one week. With respect to flow rates, the addition of these requirements would seem to imply that flow rate fluctuations are actionable or result from a compliance problem, which often is not the case. Gas quality at the outlet of internal combustion engines is clearly beyond the purview of this Rule. Finally, the 3-hour monitoring period also imposes unduly burdensome monitoring requirements that are not proven to reduce emissions.

ix. One detection of methane above the 200 ppmv threshold should not trigger regulatory obligations.

The Draft Regulation would require compliance with Sections 95464 through 95476 of the Rule where a landfill has a landfill gas heat input capacity greater than or equal to 3.0 MMBtu/hr recovered and where there is a measured concentration of 200 ppmv methane or greater using the instantaneous SEM procedures under Section 95471(c)(1) and (c)(2), including monitoring performed in response to a remotely detected emission under Section 95469(b)(3). *See* Section 95463(b)(2). Importantly, Section 95464 contains the GCCS requirements.

This “one-hit trigger” of an instantaneous SEM detection of 200 ppmv to require GCCS installation is inappropriate and must be revised to allow for operators to first conduct corrective action where the methane was detected. Surface detections of methane can occur for a wide variety of reasons, especially at the extremely low detection threshold of 200 ppmv. There is no opportunity or incentive for sites—specifically closed sites—to remediate an exceedance and demonstrate effectiveness of such corrective measures with re-monitoring. Such inflexibility for closed sites particularly limits short-term reduction opportunities. Moreover, particularly for closed sites, the Draft Regulation may actually increase emissions by disturbing certified final cover to require installation of a new GCCS. Such a requirement could also be in direct conflict with federal and/or solid waste requirements.

Likewise, remote monitoring detections are not an appropriate basis for the mandatory application of regulatory requirements, especially the capital and labor-intensive installation of a GCCS. As set forth herein, significant issues remain with respect to the detection capabilities of emerging measurement technologies relative to the unique characteristics of MSW landfills and LFG, and the quantification methodologies that convert such detections to assumed emission rates, are likewise undeveloped, and in many cases, proprietary. These technologies should not be the basis on which GCCS requirements are triggered.[24]

In this respect, only if, after two attempts to conduct corrective action in accordance with Section 95469(a)(1)(B), the leak continues to exist, should operators be required to install GCCS and comply with Section 95464 through 95476 of the Rule.

[24] *See* EPA-HQ-OAR-2025-0186-0311, National Waste & Recycling Association’s recent comments on EPA’s Proposed Recission of the Greenhouse Gas Reporting Program and Reconsideration of the Table HH-3 Collection Efficiencies: 90 Fed. Reg. 44591 (Sept. 16, 2025).

x. The provisions allowing semi-continuous GCCS operation are prohibitive.

The Draft Regulation would only allow for semi-continuous operation of a GCCS at closed MSW landfills with robust final cover and low methane generation. However, the same issues warranting semi-continuous operations, such as reduced landfill gas flow rate and methane content, may occur at only portions or areas of the overall landfill site. Accordingly, CARB should revise Section 95467(a) to allow for semi-continuous operation at both closed MSW landfills and areas of closed or inactive MSW landfills that achieve the same criteria.

Further, operators would also be required to demonstrate that there have been no exceedances of the SEM limits specified in Section 95465 during the previous three years. *See* Section 95467(a)(3). SEM detections above the relevant thresholds may not always be related to GCCS efficiency or operation but may instead be the result of a temporary cover issue that can be fixed quickly and easily. On this basis, a prolonged period of three years is inappropriate and will inhibit most operators from taking advantage of the semi-continuous provisions instead of utilizing supplemental fuel to maintain GCCS operation. CARB should instead impose a requirement of one year without SEM detections.

Indeed, methane content is a better indicator of gas quality required to maintain operation of GCCS, and WM therefore supports the inclusion of methane content considerations imposed by Section 95467(a)(4); however, requiring that methane content does not exceed 30% by volume for at least five consecutive years will also render the semi-continuous provisions unusable. Further, subsection (a)(4) is dependent on the use of continuous flow rate measurements for a minimum of one year. This requirement is impracticable because it does not seem to allow for system upsets or periods where monitoring cannot be conducted.

CARB also proposes to allow semi-continuous operation only where a professional engineer has certified that there are no available modifications to any control device that would allow for the control device to operate continuously at the methane flow rate and gas composition being collected, and where there is no adjacent facility that can use the landfill gas as supplemental fuel to their own control device. *See* Section 95467(a)(5). This requirement is stringent to the point of being prohibitive of semi-continuous operation because operators will always have the option to utilize supplemental fuel to allow for continuous operation of the control device. However, doing so will result in additional emissions not contemplated by CARB. Moreover, presuming that the landfill gas will be of high enough quality and that the infrastructure exists to transport it to an adjacent facility fails to account for the operational realities associated with control device operation. This requirement should be revised to indicate that the use of supplemental fuel should not be considered an "available modification," and remove the requirement to consider the existence of an adjacent facility.

xi. The GCCS shutdown criteria should not impose overly stringent SEM requirements.

The Draft Regulation would allow for permanent shutdown of GCCS where there no SEM exceedances occurred during the previous five years. *See* Section 95467(d)(3). Consistent with WM's comments with respect to semi-continuous operation criteria, SEM detections above the relevant thresholds may not always be related to GCCS efficiency or operation but may instead be the result of a temporary cover issue that can be fixed quickly and easily. On this basis, a prolonged period of five years is inappropriate and will inhibit most operators from taking advantage of the shutdown provisions. Accordingly, CARB should reduce the timeframe in which landfills must be without SEM detections above the applicable threshold to three years.

Under Section 95467(d)3), CARB would also require operators to measure the methane content to the inlet of each control device at least every three hours to show that the measured methane content is below 125 metric tons per year methane for at least three years is too stringent. 125 metric tons per year of methane is equivalent to 13 scfm—an impossibly low standard to meet. Instead, CARB should require operators to use weekly GEM recordings for a period of one year and evaluate that data in order to meet the permanent shutdown criteria.

xii. Operators should have more time to install and operate GCCS.

As currently written, operators of active MSW landfills will have only six months to install and operate GCCS following the approval of their Design Plan. *See* Section 95464(a)(2). This timeframe is not technically feasible, because a GCCS cannot be constructed in six months. Operators will necessarily be required to design and begin constructing a GCCS *before* the submission date of their Design Plan, which is due one year after detecting any leak on the surface exceeding 200 ppmv in accordance with Section 95463(b)(2)(B). In this respect, operators will be obligated to construct a system that has not yet been approved, and could be subject to change following CARB's review. Operators should not be required to make what may amount to millions of dollars of capital investment to construct a GCCS, only for CARB to require material, expensive changes following submission of the Desing Plan. The proposed timeline does not consider local agency permitting timelines, inclement weather, supply chain limitations, contractor availability, or other factors.

WM requests that CARB provide operators with 15 months following approval of the Design Plan to construct and operate GCCS in order to allow adequate time for the items noted above. Additionally, in the event that any required permits authorizing construction to commence are not issued in a time frame that allows for this deadline to be met, an owner or operator should be able to request and automatically receive additional time for commencement of operation of the GCCS.

d) Recordkeeping and Reporting Obligations

CARB proposes to implement several new reporting obligations that will not serve to reduce emissions from MSW landfills, including:

- All SEM and component leak monitoring data, including concentration reading, location coordinates, and time and date of each measurement at each one hertz reading. *See* Sections 95470(a)(1)(D), 95470(a)(1)(F), 95470(b)(6)(D), 95471(c)(2)(A), 95471(c)(3)(A). Like the requirement imposed on technologies used for purposes of monitoring unsafe-to-walk surface areas, this obligation is inappropriate and technically infeasible. One second intervals would flood both operators and CARB with immense amounts of data with no additional benefit in terms of emissions reductions. Accordingly, WM requests that CARB revise the requirement to reduce the frequency to five seconds.
- In the Annual GCCS Report, CARB would require the most recent topographic map of the site in a specific format, including the areas with daily intermediate, and final cover, as well as unsafe-to-walk surface areas. *See* Section 95470(b)(3)(E). Locations with daily cover and unsafe-to-walk surface areas change frequently; CARB should therefore specify that the map does not need to be updated every time the cover type changes in an area.
- Quarterly Monitoring Data Reports, which must include records of all SEM data, component leak monitoring data, and wellhead monitoring data. *See* Section 95470(b)(4). All of the information will be submitted in the Annual GCCS Report, making this obligation unnecessary and duplicative. Quarterly reporting would not provide operators with enough time to prepare reports, especially where follow up monitoring and corrective action may be required to actively reduce emissions. CARB should revise this requirement to semi-annually or allow for reporting only in the Annual GCCS Report.
- SEM Notifications 15 days prior to monitoring event. *See* Section 95470(b)(5). This obligation may conflict with subcontractor availability and will provide no emissions reductions. It should therefore be removed.

- CARB would require all submissions to contain certification by a responsible official of truth, accuracy, and completeness. *See* Section 95470(b)(9). This should only be required for submission of reports.

Thank you for your consideration of our comments.

Sincerely,

Christine Wolfe
Director of Government Affairs, California, Hawaii, Nevada
WM

Attachment A: Summary of Comments on Regulatory Alignment and Operational Feasibility

Attachment B:

National Waste and Recycling Association Response, Use of Advanced and Emerging Technologies for Quantification of Annual Facility Methane Emissions under the Greenhouse Gas Reporting Program; Docket ID No. EPA-HQ-OAR-2024-0350 (NWRA 2024)

and

WM Response, Use of Advanced and Emerging Technologies for Quantification of Annual Facility Methane Emissions under the Greenhouse Gas Reporting Program; Docket ID No. EPA-HQ-OAR-2024-0350 (WM 2024a)

Attachment C: Selected ETLF Bibliography

Attachment D: Comments on the ISOR CEQA Analysis

Collect
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National Waste & Recycling Association℠

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Submitted electronically via https://www.regulations.gov

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Office of Air and Radiation
U.S. Environmental Protection Agency

Re: Use of Advanced and Emerging Technologies for Quantification of Annual Facility Methane Emissions under the Greenhouse Gas Reporting Program;

Docket ID No. EPA-HQ-OAR-2024-0350

Dear Mr. Roma:

The National Waste & Recycling Association (NWRA) is pleased to submit the following comments to the *Request for Information on the Use of Advanced and Emerging Technologies for Quantification of Annual Facility Methane Emissions under the Greenhouse Gas Reporting Program*; Docket ID No. EPA-HQ-OAR-2024-0350 (hereinafter, the "RFI").

NWRA represents companies and professionals in the solid waste industry. NWRA is a not-for-profit trade association representing private solid waste and recycling collection, processing, and management companies that operate in all fifty states. Our members strive to deliver collection, composting, recycling, and disposal services that are protective of the environment in a safe, science-based, and technologically advanced manner. It is important that regulatory policy enables us to continue to deliver these essential services. NWRA's members own and operate municipal solid waste landfills governed by EPA's Greenhouse Gas Reporting Program ("GHGRP") rules at 40 C.F.R. Part 98, Subpart HH (hereinafter, "Subpart HH").

NWRA has long been partners with EPA in developing data, methods and best practices governing the operation of municipal solid waste landfills, including the development of emission estimates and data governing the quantification of greenhouse gas emissions associated with our members' operations. We have been active participants in the rulemaking process for Subpart HH, and likewise are pleased to participate in responding to this RFI.

I. Background to NWRA Comments

NWRA and its members have been active participants in the GHGRP since its inception in 2009. Importantly, and most relevant to the RFI, NWRA has been very engaged in providing feedback to EPA relating to the recent revisions to Subpart HH encompassed within the rule entitled *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule,* 89 Fed. Reg. 31802 (April 25, 2024), docket No. EPA-HQ-OAR-2019-0424 (hereinafter, the "2024 Subpart HH Revisions"). NWRA submitted comments to two Notices of Proposed Rulemakings underlying the 2024 Subpart HH Revisions; *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule,* 87 Fed. Reg. 36920-37119 (June 21, 2022) (hereinafter the "Data Quality Improvements Proposal"), and *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule,* 88 Fed. Reg. 32852 (May 22, 2023) (hereinafter the "Supplemental Proposal").

The 2024 Subpart HH Revisions are highly relevant to the subject matter of the RFI, because EPA's decision to lower default landfill gas collection efficiency values set forth in Table HH-3 in the 2024 Subpart HH Revisions was based entirely on EPA's assessment of papers and data released by environmental advocacy organizations and others asserting, based on emerging measurement technologies, that actual landfill gas emissions are higher than previously reported in the GHGRP.[1] NWRA disagrees with this assertion, and with EPA's action in lowering the landfill gas collection efficiency values in Table HH-3. NWRA's members have committed considerable time and resources in assessing the capabilities of emerging measurement technologies and in so doing have engaged with a broad suite of technology vendors, academics and agencies. While we believe that emerging measurement technologies may be useful in providing additional tools for the detection of landfill gas emissions, most of them are not yet ready for wide-scale deployment in the regulatory context, and do not meet the data quality objectives and criteria necessary for the quantification of landfill gas emissions or required use in rulemaking. For these reasons, NWRA submitted a Petition for Reconsideration in response to the 2024 Subpart HH Revisions on June 24, 2024, a copy of which is attached hereto as Exhibit 1. Importantly, EPA has granted NWRA's Petition for Reconsideration of the 2024 Subpart HH Revisions, and we look forward to working collaboratively with EPA toward the continued improvement of data quality and reporting under the GHGRP.

In reviewing NWRA's comments herein, we ask EPA to carefully consider the following overarching principles that underpin our detailed responses. Each of these is critical to a full and fair evaluation of emerging measurement technologies and their potential application to municipal solid waste landfills:

- Municipal solid waste landfill operations are unique and pose challenges that are not experienced in the oil and gas context in measuring greenhouse gas emissions. Thus, EPA's assessments and regulatory determinations for oil and gas facilities cannot be imposed upon municipal solid waste landfills without significant additional evaluations and methods development.

[1] *See* 89 Fed. Reg. at 31855–56. Notably, EPA asserted in the preamble to the RFI that EPA "did not take final action to incorporate advanced measurement technologies in the April 2024 final rule. . ." revising Subpart HH due to "limitations in existing technologies" even though its reduction of collection efficiencies were directly informed by third party advocacy using these technologies. *See* RFI, 89 Fed. Reg. at 70178.

- For the municipal solid waste landfill sector, emerging measurement methods encompass a variety of technologies that differ in approach and have shown a wide range of accuracy in detection and quantification when compared to known release rates.

- Given the nature of landfill gas emissions, emerging measurement technologies are currently incapable of detecting emissions at the same level of precision as in the oil and gas sector.

- Point in time observations cannot be appropriately or reliably quantified and compared to annualized reported emissions.

- At this time, emerging measurement technologies are not transparent, open-source or standardized.

- At this time, emerging measurement technologies can be used only as a tool to support landfill gas collection and control practices, in conjunction with site-specific data using more established means.

- Site-specific data using established methodologies are critical to the accurate quantification of landfill gas emissions and cannot be replaced by emerging measurement technologies.

In light of the importance of these principles to NWRA's response to the RFI, and to avoid overlap in our responses to EPA's individual questions in the RFI, we have organized our comments around these principles, as set forth below, and have attempted to indicate throughout this document which RFI questions are most relevant to each comment.

II. Specific Comments in Response to RFI

A. Municipal solid waste landfills, and their emissions, are unique.[2]

EPA has begun to deploy emerging measurement technologies for purposes of detecting methane emissions from oil and gas sources, including through the "Super-Emitter Program" incorporated into the New Source Performance Standards / Emission Guidelines for that sector. While the program envisions a verification and certification process for third-party measurement technologies, it is our understanding that no such technologies and third parties have completed the verification and certification process. In addition, we understand that significant challenges remain in terms of meeting EPA's objectives for this and other emerging measurement programs. Some of these challenges are addressed in a submittal by Veritas, which is an initiative developed by GTI Energy experts in collaboration with a broad range of stakeholders, to develop and refine a standardized, science-based, technology-agnostic, measurement-informed approach to calculating and reporting methane missions for the natural gas industry. Veritas identifies and

[2] The text in section is responsive and relevant to each of the questions contained in EPA's RFI. All of the questions are contained in Appendix A, attached hereto.

seeks to address current challenges relating to intermittent emissions; identification, attribution and quantification for events that are below detection limits; and standardization for quantification methodologies, among others.[3] The challenges that are identified for the oil and gas sector are even more attenuated, and must be examined closely, before any such technologies could be considered for inclusion in regulatory structures for municipal solid waste landfills.

There are several important distinctions between greenhouse gas emissions from landfills and from the oil and gas sector, all of which are important for purposes of considering the potential use of emerging technologies for detecting, measuring, and quantifying emissions in upcoming rulemakings pertaining to landfills.[4]

First, landfill gas and natural gas have different compositions and different characteristics. Landfill gas is comprised of roughly half methane and half carbon dioxide. In contrast, natural gas is comprised of 100% methane. Landfill gas is slightly heavier than air, influencing its dispersion and behavior differently than methane, which is significantly lighter than air. In addition, landfill gas emissions occur due to the decomposition of organic waste that is already a part of the carbon cycle, whereas oil and gas emissions are primarily the result of extracting, processing, and transporting fossilized carbon from underground shale areas and introducing that carbon into the carbon cycle.

Emission rates also differ significantly between landfills and oil and gas facilities. Leaks at oil and gas facilities tend to occur at a relatively constant rate under significant positive pressure. Landfill gas collection and control systems, on the other hand, are generally maintained at negative pressure, thereby causing any leaks to be released at near-atmospheric pressure. Leaks at landfills are ephemeral and can vary significantly depending on a number of factors, including construction activities, atmospheric and meteorological conditions, operational fluctuations, and diurnal and seasonal considerations.

Moreover, municipal solid waste landfills and oil and gas facilities are operated in an entirely different manner, wherein some emissions are expected and intrinsic to landfill operation. By contrast, emissions from oil and gas facilities are not intrinsic and can be mitigated and/or avoided with proper management and controls. Whereas oil and gas facilities are static, municipal solid waste landfills are continuously under construction—the working face is consistently moving, new cells are being built, old cells are being closed, and other cells are undergoing placement of intermediate cover. Accordingly, landfill gas emissions are expected to occur over the active life of the landfill as a result of such construction.

In addition to the ephemeral nature of leaks and the constant state of construction at landfills, landfill gas emissions are also highly influenced by the topographic nature of landfills. For example, landfills may have an abundance of hills, ditches, high areas, and low-lying areas, each with their own unique "micro-climate." As a result, landfill gas acts according to the micro-meteorological factors where it is emitted, including significant variance of windspeed,

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[3] *See* Veritas Comment, EPA-HQ-OAR-2024-0350-0021.

[4] Although the RFI is for the express purpose of considering emerging measurement technologies in the context of the GHGRP, NWRA is also aware of EPA's intent to commence a rulemaking process to revise the New Source Performance Standards ("NSPS") and Emission Guidelines ("EG") governing municipal solid waste landfills.

temperature, and barometric pressure at the surface of the landfill versus higher up in the atmosphere. Moreover, landfill gas tends to travel along the surface of the ground outward. As landfill gas moves downhill, it tends to pool, impinging on and complicating attempts to quantify it using aerial techniques. More specifically, when landfill gas pools, measurement technologies tend to inaccurately overestimate emissions. To further complicate the behavior of landfill gas, ground-level vegetation and other physical interferences exercise influence over the movement of landfill gas. Accordingly, landfill gas plumes behave in a non-Gaussian manner (i.e., skewed and uneven). In contrast, the topography of oil and gas exploration wells tend to be relatively uniform, allowing plumes of methane to follow Gaussian distribution (i.e., spread from a continuous point in a predictable pattern of dispersion). EPA should prioritize characterizing and evaluating the impacts of topographic conditions on landfill gas behavior, and in turn, emissions quantification.

As a result of these differences, emission detection techniques have historically differed across both industries. For roughly thirty years, landfill emissions have been calculated under the GHGRP using a *modeled* approach—the applicable formulas use: 1) the difference between the estimated landfill gas generated and the amount collected; or 2) an assumed collection efficiency is applied to the collected gas to estimate uncaptured emissions. From a work practice standpoint, under the NSPS/EG rules, fugitive emissions from covered areas are detected and mitigated by conducting Surface Emissions Monitoring ("SEM") utilizing a modified EPA Method 21 to detect a methane concentrations at the surface of the landfill. At oil and gas facilities, emissions are measured utilizing a variety of techniques including direct measurement with sensors installed at key points, such as valves and compressor stations, to continuously monitor and detect leaks. Oil and gas facilities also use Method 21, but instead of SEM, portable gas analyzers measure specific components around equipment such as pumps, valves and flanges. Accordingly, oil and gas facilities are able to directly *measure* emissions, due entirely to the fact that their facilities are constructed and operated in a manner that imposes little to no uncertainty with respect to detecting, measuring, and quantifying emissions directly.

For all of the above reasons, the approaches to detecting, quantifying and reducing emissions from landfills and from oil and gas facilities must likewise differ. These differences have directly informed NWRA members' experience with emerging measurement technologies and our comments to the RFI questions set forth below.

B. Emerging measurement technologies are being evaluated at municipal solid waste landfills.[5]

NWRA and its members have been deeply engaged in the evaluation of various emerging measurement technologies, including fixed sensor, handheld equipment, drone, aircraft and satellite. These types of technologies may utilize various detection techniques, as follows:

- Mobile Gaussian Plume Assessment ("MGPA") utilizes a high-performance methane analyzer deployed in a vehicle and carried along transects at the fenceline or further downwind, alongside geolocated wind speed and direction measurements.

[5] The text included in this section is responsive to RFI Question 1.a.i.

- Mobile Tracer Correlation Emission Assessment ("MTCEA") involves a controlled release of a non-reactive gas, such as sulfur hexafluoride or acetylene, that is easy to detect and distinguish from other gases emitted by the landfill, so that correlation can be made with target gases and the tracer gas can be used to estimate emissions of the target gases.

- Gas mapping light detection and ranging ("LiDAR") uses a pulse beam of radiation that reflects off the ground surface, and back to the aircraft where a specialized receiver detects and analyzes the special signature of light absorbed or scattered by methane in the atmosphere, with a resulting column measurement that can be used for detection or quantification.

- UAV Column Sensor Emission Assessment ("UCSEA") is a UAV-mounted Tunable Diode Laser that emits a narrow beam of light at a wavelength appropriate to detect methane by using its special signature. The laser is carried on the underside of the UAV and is directed towards the ground. The laser beam reflects off the ground and back to the UAV. During its travel, the beam interacts with the gas molecules and some of the light is absorbed at specific wavelengths corresponding to the molecular absorption lines of methane. The technology is often called TDLAS, Active TDLAS, or a "column-type" sensor. Measurements are retrieved in ppm*m.

- UAV Point Sensor Emission Assessment ("UPSEA") uses a drone with a mounted TDLAS, MOS, or other point measurement sensor for landfill gas quantification. In the method, the UAV flies repeated horizontal transects perpendicular to the wind direction and repeats the measurements at different altitudes to paint in a screen or curtain. Sometimes called a "flux plane" measurement, the method sees wind speed, temperature and pressure values interpolated across the plane, after which the interpolated values are used in a mass balance equation to solve for emission rate.

- Airborne Point Sensor Emission Assessment ("APSEA") uses high-performance gas analyzer mounted in a small aircraft. Flying stacked orbits at a radius slightly larger than the site. Orbits are repeated at progressively higher altitudes until the aircraft reaches the top of the surface-mixed layer. Wind values may be measured in the air, or wind estimates are procured from databases. The wind and methane concentration are interpolated onto a flux screen around the site, and the flux rate is solved using mass balance equation.

- Remote Point Sensor Emission Assessment ("RPSEA") consists of freestanding stations around the landfill perimeter in which various environmental sensors are used to measure wind speed, wind direction, temperature, pressure, and humidity. Methane detection is done using a metal oxide (MOS) sensor. Another type uses an open path Fourier Transform infrared (FT-IR) spectrometer. Algorithms are used to continually assess facility emission using an inverse source dispersion model, or similar.

- Satellite Imaging Sensor Emission Assessment ("SISEA") uses a satellite-mounted sensor to take a series of images and collect methane column measurements for individual pixels. The images are merged, and an interference pattern is created which allows the quantification and detection of methane emissions at facility scale.

- Lagrangian Emission Assessment ("LEA") combines the type of truck-based sampling used in MGPA but pairs the measurements with a different post-processing algorithm. Lagrangian models are commonly used to predict source location probabilities and can be used to calculate emission rates for either point or area-based sources. Normally, Lagrangian models are applied to tower-based measurements, but can be adapted to a mobile setting, as if the tower were moving through the domain.

See, *Hossian* et. al., *A Controlled Release Experiment for Investigation Methane Measurement Performance at Landfills* (2024) ("First EREF Controlled Release Study").[6]

Each of these technologies was evaluated in a comprehensive landfill study by the Environmental Research & Education Foundation ("EREF") at the Petrolia Landfill in Canada between November 6, 2023, and November 14, 2023. The following technologies and platform types were assessed in the study:

Table 1: Summary of methodologies that participated in the controlled release study

Technology Identifier	Technology Type	Platform Type	Sensor	Method	R&D ?
A	Quantification/ Detection	Truck	LGR	MGPA	No
B	Quantification	Truck	LICOR	MGPA	No
C	Quantification/ Detection	Drone	TDLAS	UPSEA	No
D	Quantification	Drone	Mid-IR LDS	UPSEA	No
E	Quantification	Truck	Picarro	MTCEA	No
F	Quantification	Aircraft	Picarro	APSEA	No
G	Quantification/ Detection	Helicopter	LiDAR	LiDAR	No
H	Quantification/ Detection	Satellite	Spectrometer	SISEA	No
I	Quantification	Fixed	EM27	RPSEA	Yes
J	Quantification	Fixed	Metal Oxide	RPSEA	Yes
K	Quantification	Fixed	Metal Oxide	RPSEA	Yes
L	Detection	Drone	TDLAS/ Laser Falcon	UCSEA	No
M	Detection	Drone	TDLAS/ Laser Falcon	UCSEA	No
N	Quantification/ Detection	Truck	LGR	LEA	Yes

[6] A copy of the First EREF Controlled Release Study is attached hereto as Exhibit 2.

The primary findings from the First EREF Controlled Release Study can be summarized as follows:

- MTCEA provided good quantification estimates while being flexible to operate in various weather conditions.
    - One vendor evaluated
    - Average uncertainty of ± 20%
- Gas Mapping LiDAR can detect source leaks to 1-3 kg/hr with 90% probability
    - One vendor evaluated
    - Average uncertainty of ± 45%
- UPSEA can only operate in conditions with no precipitation and windspeed below 12 m/s.
    - Two vendors evaluated
    - Combined average uncertainty of ± 48%
- UCSEA reported high number of false positives (False positive fraction > 0.79) with limited visibility when measuring active emission points on slopes
    - Two vendors evaluated
    - Leak detection only
- RPSEA has not been validated by any other studies for use in landfill applications.
    - Three vendors evaluated
    - Average uncertainty of ± 39% in the best-case scenario
- MGPA methodologies were limited by a compressed timeline. Further studies are required to include necessary time for replication.
    - Two vendors evaluated
    - Average uncertainty of ± 43%
- APSEA consistently underestimated emission rates with low bias where predicted emission rates were only 52% of actual values and required meteorological conditions (*i.e.*, low cloud cover, windspeed from 2-6 m/s, good solar insolation) that allowed for a plume to rise and disperse.
    - One vendor evaluated
- SISEA can detect large emission events at or above 300 kg/hr and requires little to no cloud cover and wind speeds less than 10 m/s
    - One vendor evaluated
- LEA overestimated emissions in most cases and is a methodology typically applies in a tower-based system
    - One vendor evaluated

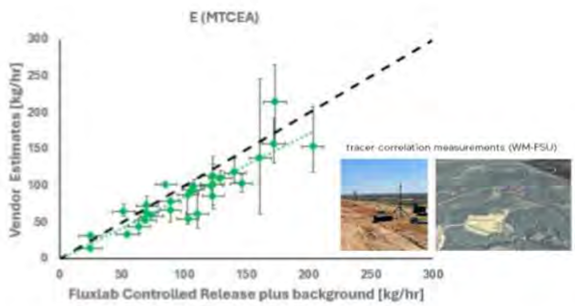
The First EREF Controlled Release Study evidences variability across technology types and even across vendors within specific technology types. The study provided insight on how these technologies operated and performed at a closed landfill setting and provides a baseline for future controlled release studies. Pictorial depictions of the First EREF Controlled Release Study results are shown in the following:

EMISSIONS MEASUREMENT KEY LEARNINGS

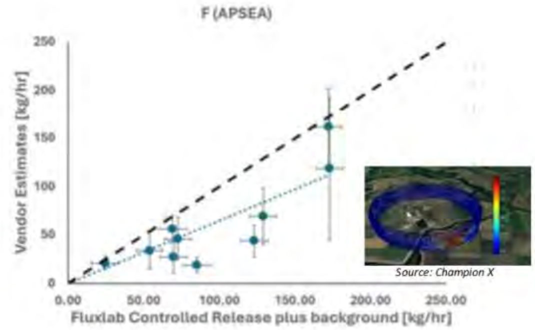
EREF 1st Controlled Release Study

Quantification Results: Mobile Tracer Correlation and Aircraft Mass Balance

Mobile Tracer Correlation– good alignment with true release rates but complex and limited by accessible roads



Aircraft Mass Balance– some alignment but limited by weather conditions and cost



*Aerial Point Sensor (APS)

12

EMISSIONS MEASUREMENT KEY LEARNINGS

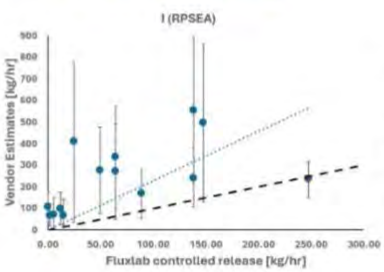
EREF 1st Controlled Release Study

Fixed sensor quantification results varies between vendors

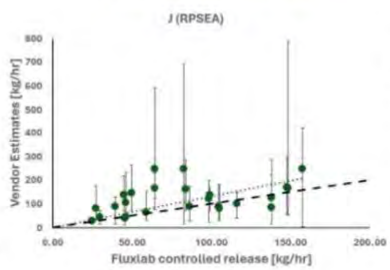
Source: Champion X

Algorithms were developed for Oil and Gas and still under development for landfills
Take-away: fixed sensors aren't there yet; deeper dive needed into vendors

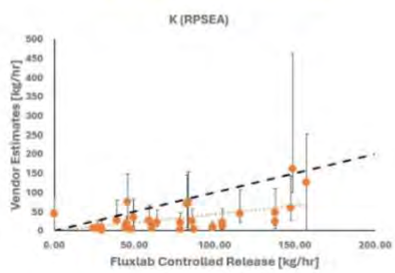
Over-estimating



Aligns Generally



Under-estimating



13 * Remote point sensor emission assessment

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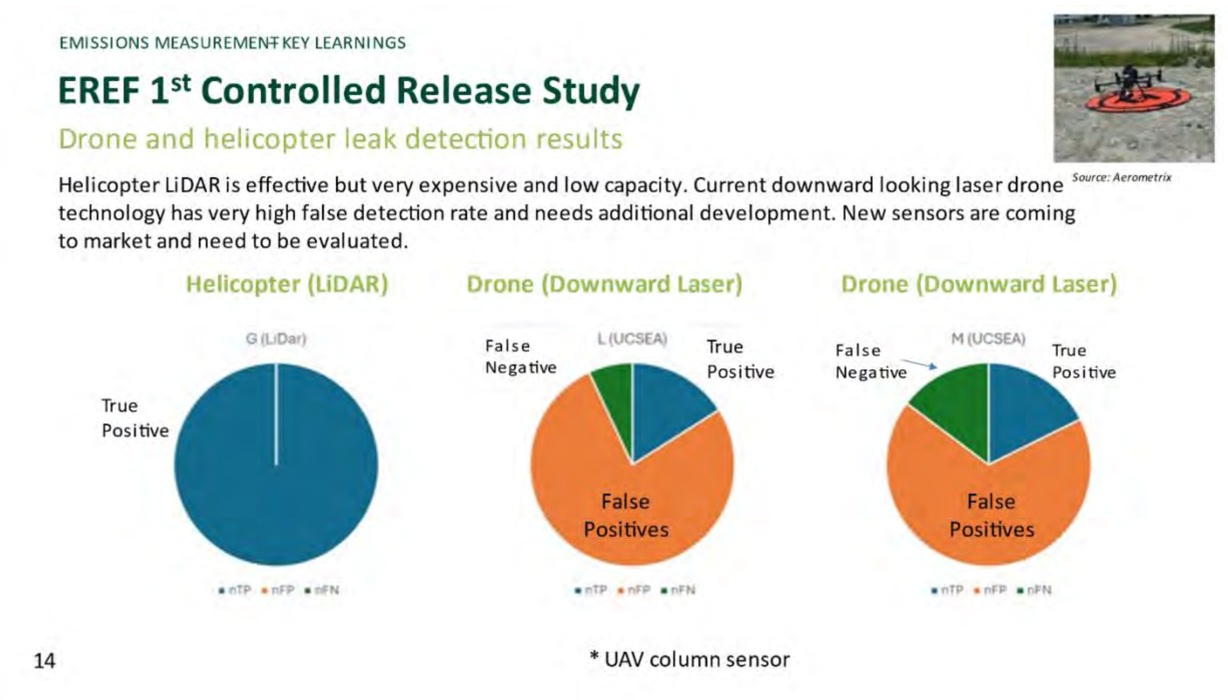

A second controlled release study is underway at the closed Petrolia Landfill to further evaluate these technologies and their vendors. The infrastructure to support releases was improved prior to the second study in order to allow multiple future controlled release studies and allow greater access to vendors to the area of the release. In particular, burying gas-piping intended to allow foot patrols of the area, and ground-based follow-up observations that are a part of some vendor service offerings. Additional invitations to vendors, and adjustments to the study protocol (e.g., higher rates for some planned release windows) were completed to allow more technology vendors to participate. The primary objectives of this Second Controlled Release Study are listed as follows:[7]

- Conduct a comparative assessment of multiple landfill emissions measurement technologies at a single site simultaneously;
- Determine the accuracy of these technologies via controlled, known release of methane;
- Assess annualized costs of utilizing these technologies at different frequencies on sites of different size;
- Evaluate variability in accuracy under different site conditions (.e.g. weather, temperature, season, etc.) *(NOTE: this objective may be considered optional or as a 2nd phase effort depending on additional cost/time needed to complete it)*.

In addition to the technologies studied by EREF, several of NWRA's member companies have engaged directly with technology vendors to evaluate the use and accuracy of satellite, aerial, drone and fixed measurements on a site-specific basis. Some findings are summarized below, but overall highlight a current lack of consistency and reliability among technologies, and an understanding that no one technology can be useful without contemporaneous site operational

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[7] NWRA will share the Final Report of the Second EREF Controlled Release Study when it becomes available. NWRA will similarly share the details and reports regarding a third controlled release event scheduled to occur in the spring of 2025.

data to accurately quantify emissions.

Finally, EPA hosted a Municipal Solid Waste Landfill Technology Workshop ("Technology Workshop") in October 2024 in Research Triangle Park. With over 100 participants, the Technology Workshop highlighted both the potential future promise but also the current gaps in readiness of these technologies to be deployed as regulatory compliance monitoring tools. Although the Technology Workshop materials have not yet been made public, NWRA urges EPA to closely evaluate them in context of the RFI.

C. Emerging technologies are currently incapable of detecting emissions at municipal solid waste landfills with the same level of precision as in the oil and gas sector.[8]

Due to the differences described above, emerging measurement technologies are currently incapable of detecting municipal solid waste landfill emissions at the same level of precision or certainty as in the oil and gas sector.

Oil and gas sector emissions are generally easier to detect than landfill gas emissions. First, as noted earlier, oil and gas emissions themselves tend to be either: routine or continuous leaks from processing equipment that (as an equipment class) can be known to leak (*i.e.*, compressor shaft seals, flange connections, etc.); or some kind of non-routine, episodic failure in a location that may or may not be prevalent. For the first type, routine methane detection of processing equipment and flange attachments would likely identify any emission points, leading to precise corrective action, as they are required to do. Because these emissions usually happen as part of a mechanical process at relatively stable and continuous process status, their emission rate can be relatively easily quantified. *See infra* Section II.D. For episodic emissions, monitoring—such as continuous fence line and periodic drone, plane, or satellite scanning—can give some assurance that these events will be detected, or that no non-routine emissions have occurred. But again, because the oil and gas operations are happening at known/recorded process status, once identified the leak event can be somewhat readily quantified. These types of monitoring are also useful due to the geographic nature of oil and gas operations; there are many facilities that are not regularly manned, so fence line and aerial campaigns can collect data very efficiently.

Landfill emissions, however, are neither so reliably detected nor quantified. First, there are generally two areas of landfill emissions: emissions that are recently referred to by EPA as "intrinsic" emissions, such as those that relate to the landfill working face, maintenance activities, and diffuse emissions through landfill cover; [9] and discrete emission sources such as cover system failures, gas extraction issues, and infrastructure leaks, flare issues, or venting due to malfunctions (including both install and failure).[10]

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[8] The text included in this section is responsive to RFI Questions 1.a. and 2.

[9] Members of EPA's Office of Research and Development ("ORD") have referred to these emissions as "intrinsic" or "expected" in that they can be partially controlled but never eliminated. *See e.g.*, EPA webinar materials, *Airborne Survey-Methane from U.S. Landfills*, at slide 13, attached hereto as Exhibit 3.

[10] ORD has referred to these emissions as "fugitive" in that they are more easily dealt with via the "find-and-fix" method. *Id*.

Intrinsic emissions are ephemeral and vary significantly depending on a number of factors, including construction activities, topography, weather, barometric pressure, and diurnal and seasonal considerations. Due to the diffuse and variable nature of landfill emissions, fence line type sensors can have variable reliability in detecting and locating, and low emissions rates are challenging for plane and satellites to detect. Episodic "fugitive" emissions can be somewhat easier to locate, as operators are typically immediately aware of or become aware of discrete infrastructure failures through olfactory and visual inspection as well as routine gas collection and control system monitoring.

Aerial and satellite methodologies are limited by diurnal and seasonal considerations and fail to account for micro-climate fluctuations that occur as a result of topographic differences across landfills. The following figure evidences the behavioral impact that complex topography has on landfill gas emissions:

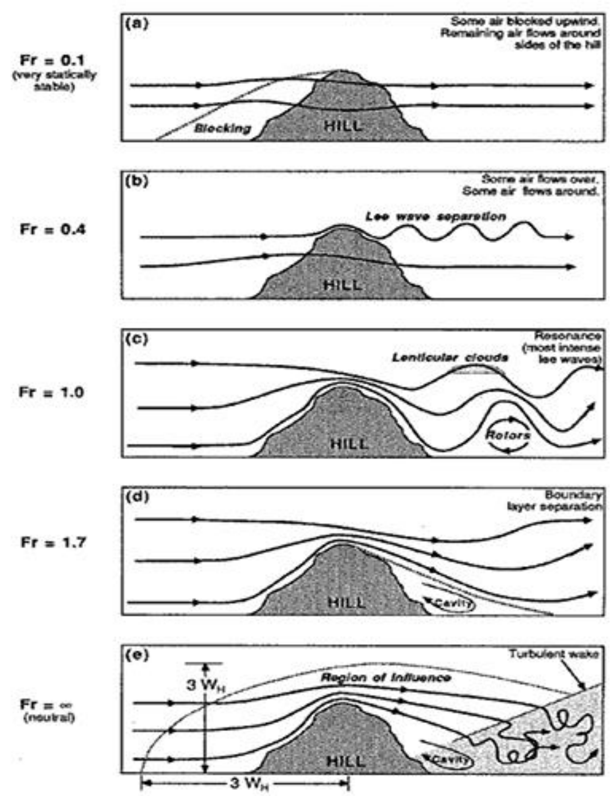

Figure 3: Idealized flow over an isolated hill. Different stability conditions are defined by the values of the Froude number Fr=U/(NL), where U is the wind speed, N the Brunt-Vaisala frequency and L is the length scale of the hill (from Stull, 1988, p. 602, fig. 14.4). [Reprinted with kind permission from Kluwer Academic Publishers]

See Finardi, et al., *Wind Flow Models over Complex Terrain for Dispersion Calculations*, at 8 (1997).

EPA has also acknowledged that aerial and satellite technologies are limited in their detection capacity, particularly with respect to "diffuse area sources."[11] Moreover, remote sensing technologies are limited by cloud cover and surface reflectivity anomalies as well as wind speed and direction. Satellite orbital hours vary by season and geographic location—for example, the orbital schedule for nine satellites over Colorado in November 2024 were all within a 5-hour window. In addition, aircraft flights must be "carefully planned and operated" in order to "capture plumes accurately," making them unsuitable for unpredictable landfill emissions and putting them directly at odds with the very nature of landfills, whose working face is constantly moving and whose cells are constantly under construction. Direct in-situ aerial sampling is similarly situated. Though it is capable of capturing both point sources and diffuse area sources, flight and sampling conditions must be "ideal"—that is, wind speed and direction are moderate and steady and turbulence and precipitation are limited—in order to achieve the greatest accuracy. Both remote and direct in situ technologies are hindered by their threshold detection capabilities.[12]

UAV technologies, including UCSEA and UPSEA, were evaluated in the First EREF Controlled Release Study, but have not been validated for use in the oil and gas sector. The study concluded, with respect to UCSEA, that because "[m]ost of the laser beam's transit is of course through atmospheric air containing relatively little methane," "a strong methane enhancement at the surface is diluted by the air above and can be difficult to detect, unless the sensor has very high precision, or flight altitude is reduced."[13] Vendors at the Technology Workshop indicated that the detection and quantification capabilities of UAV technologies is dependent on suitable wind and meteorological conditions.

Ground-based measurement technologies also have detection limitations. In particular, certain sensor vendors have indicated that sensors cannot account for the complex topography of landfills and typically employ dispersion models that assume flat ground. Additionally, vendors have indicated that additional research is necessary to better understand how their sensor can detect and quantify landfill gas plumes that stay close to the surface of the landfill, as distinct from oil and gas plumes. While fixed, ground-based sensors appear to have promising detection capabilities at 0.1 kg/hr or below, the vendors have acknowledged that their capabilities also depend on ideal wind and meteorological conditions during daytime hours.[14]

While certain of the existing advanced measurement technologies are able to attribute landfill emissions, including UAV technologies, satellite technologies are incapable of attributing detected plumes to specific equipment types, facilities, or processes in an automated manner. Carbon Mapper describes its attribution process as one considering two criteria: "high concentration—typically a spatially tightly constrained area of maximal constrained area of maximal concentration, indicative of a large gas release," and "plausible RGB/GIS

[11] EPA, Whitepaper No. 6: *Aerial Monitoring for Examining Landfill Methane Emissions*, at 6 (Oct. 2024) ("Remote sensing technologies like AVRIS-NG and GAO are tuned to detect larger point sources and typically cannot detect the lower concentration, diffuse area sources; thus, remote sensing technologies typically do not encapsulate those diffuse emissions into their emission estimates from a site.").
[12] *Id.* at 8.
[13] Exhibit 2, First EREF Controlled Release Study, at 19.
[14] *Id.* at 64.

infrastructure."[15] Carbon Mapper then attributes plumes to "sectors," rather than specific areas within the site.

D. Point in time observations cannot be appropriately or reliably quantified and compared to annualized reported emissions[16]

1. General Quantification Difficulties

Existing advanced measurement technologies cannot provide quantified methane emission rates for municipal solid waste landfills using transparent, open-source, and standardized methodologies at this point in time. In fact, no standardized quantification methodologies currently exist for solid waste landfills. As evident from the Technology Workshop, technology vendors apply their own unique—and in many cases proprietary—quantification algorithms in quantifying detected emissions, though it is unclear whether their algorithms can be adjusted to account for the factors unique to municipal solid waste landfills.

In the recently updated NSPS/EG applicable to oil and gas facilities, EPA implemented a "Super Emitter Program."[17] The Super Emitter Program is based on third party detection and reporting of leaks and releases of 100 kg/hr or more of methane from affected facilities (individual well sites, centralized production facilities, compressor stations, and natural gas processing plants). Although the Super Emitter Program envisions an EPA verification and certification process for third-party observers and their technologies, no third parties have been certified for the purposes of the Super Emitter Program, so no lessons can be learned yet from its implementation. Indeed, the National Institute of Standards and Technology ("NIST") has since recognized that there is an "[a]bsence of consistent definitions, best practices, and protocols for plume identification, data quality control, emissions analysis, and independent validation" with respect to greenhouse gas emissions from "energy exploitation and waste" facilities.[18]

EPA's "Super Emitter" requirements for the oil and gas sector are not directly transferrable to landfills because of the differences between oil and gas facilities and landfills. As mentioned earlier, oil and gas emissions tend to happen at physical locations where process data is available, or at least relatively easily approximated. For routine emissions, release quantification is relatively straight forward. Further, oil and gas emissions are predominantly methane. Methane is, by itself, lighter than air, and once released forms a Gaussian plume more easily due to the underlying assumption about gas buoyancy of Gaussian plumes. More specifically, Gaussian dispersion "applies to neutrally buoyant dispersion of gases in which the turbulent mixing is the dominant feature of the dispersion" which is "typically valid only for a distance of 0.1-19 km from the release point."[19] Further, oil and gas infrastructure has limited topographical impacts, allowing wind to help "form" the plume. This means that for episodic emissions, determining where to put fence line monitors is more readily discernable, and aerial

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[15] *See* Carbon Mapper Quality Control Description Document, at 5–6.
[16] The text in this section is responsive to RFI Questions 1.a and 1.b.
[17] *See Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review*, 89 Fed. Reg. 16820, 16876–81 (March 8, 2024).
[18] *See* NIST, *Workshop Report: Methane Super-Emitter Consensus Standards Workshop*, at 1 (July 2024).
[19] DANIEL CROWL & JOSEPH LOUVAR, CHEMICAL PROCESS SAFETY: FUNDAMENTALS WITH APPLICATIONS 194 (Andreas Acrivos et al., eds., 2nd ed. 2002).

campaigns have a more predictable "success" rate of quantification. Once identified, the plume can be tied to operational data for straightforward calculation.

In contrast, landfill gas emissions are not so easily detected. For intrinsic emissions, the large size of landfills (often >100 acres) and their topographical features make predicting where fence line monitors should reliably be able to pick up emissions very difficult. Furthermore, because the fence line is usually "far" away, significant dilution occurs and back-tracking to the diffuse emission would be quite difficult without mountains of site-specific topographical modeling and discrete wind data. SEM can more reliably find diffuse emissions but using Method 21 or OTM 51 to quantify or model intrinsic emissions from large areas simply has not been done consistently or reliably. Second, landfill gas is a dense gas that behaves differently than pure methane from oil and gas facilities:

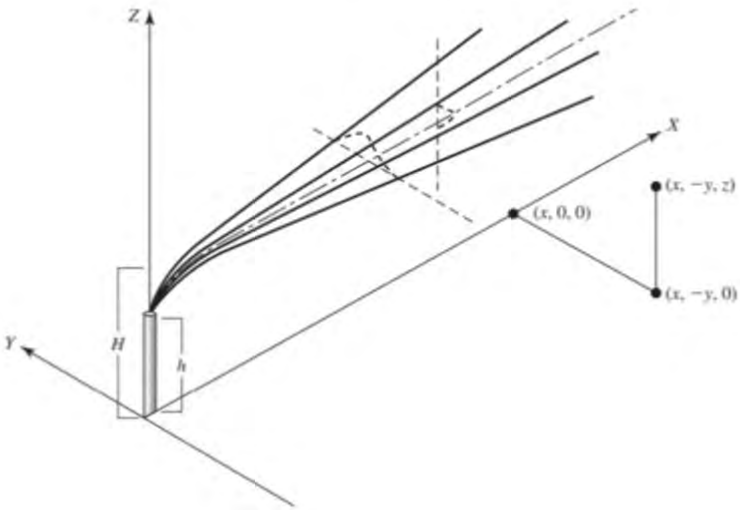
> *Following a typical puff release, a cloud having similar vertical and horizontal dimensions (near the source) may form. The dense cloud slumps toward the ground under the influence of gravity, increasing its diameter and reducing its height. Considerable initial dilution occurs because of the gravity-driven intrusion of the cloud into the ambient air. Subsequently, the cloud height increases because of further entrainment of air across both the vertical and the horizontal interfaces. After sufficient dilution occurs, normal atmospheric turbulence predominates over gravitational forces and typical Gaussian characteristics are exhibited.*[20]

Accordingly, emissions detection and quantification will be limited by the behavior of dense landfill gas, which is also heavily influenced by topographic, atmospheric, and meteorological elements, as described and depicted *supra* in Section II.A.

These topographic, atmospheric, and meteorological elements limit the use of technologies whose algorithms employ or assume Gaussian dispersion exists in all detected plumes. The figures below illustrate the difference in dispersion between Gaussian plumes and puff releases:

[20] CROWL & LOUVAR, at 195.

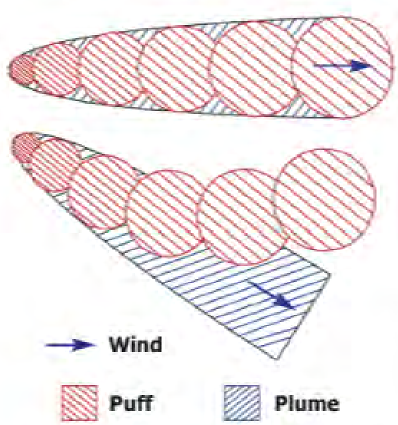
Figure 1. Orientation of the Gaussian plume model.



See Lucas Monteiro Nogueira, *Air Pollution and the Gaussian Plume Model* (Nov. 15, 2020).

Puff vs. Plume

A preliminary consideration on the advantages of puff models over plume models should be based on the following modeling requirements:



A schematic depicting the tracking differences of a puff and a plume model

- Whether the straight-line steady-state assumptions on which a plume model is based are valid
- Transport distances
- Potential for temporally and/or spatially varying flow fields due to influences of complex terrain
- Non-uniform land use patterns
- Coastal effects
- Calm winds and stagnation conditions
- Variable wind directions

For cases involving a high degree of spatial variability of the flow within the boundary layer, such as up-slope or down-slope flows or flows along a winding river valley, the straight-line steady state assumption may not be valid beyond even a few kilometers, and a puff model may be more appropriate.

Different than a plume model, a puff model releases emissions independent of the source, allowing the puff to respond to the meteorology immediately surrounding it. This also allows puffs to be tracked across multiple sampling periods until it has either completely diluted or has tracked across the entire modeling domain and out of the computational area.

See CALPUFF View, Lake Environmental.

Aerial measurements that rely on Integrated Mass Enhancement (IME) are reported to be less sensitive than Gaussian reverse dispersion calculation; however IME remains sensitive to low wind speeds. The documented approaches to estimating the effective wind speed used for emission rate calculations in literature do not account for landfill topography, surface roughness, and other micrometeorological impacts that may cause low local windspeeds, poor dispersion, and accumulation of methane over time. The accumulated methane will be observable to the aerial and satellite sensors but the assumptions related to wind and related methane dispersion have uncharacterized uncertainty that would bias measurements. Characterizing the these affects, the magnitude of the bias introduced, and strategies for meteorology data collection, limitations on monitoring approaches to avoid bias, or effective measures to overcome bias are a key research priority.

While existing drone campaigns include discrete methane and wind data, with some success, there is a general consensus that additional studies must be conducted to better understand the capabilities of drone detection and quantification. At this time, ORD has recognized the need to supplement all measurements with site-specific operations, meteorological, topographic data, etc. to get the full picture. However, different vendors have their own unique methodologies of incorporating such data, some of which are proprietary, others of which are applicable to oil and gas leak detection and not readily transferrable to landfill emissions.

Detection of episodic or "fugitive" emissions from landfills are subject to the same behavioral and environmental influences as intrinsic landfill emissions. In addition, episodic emissions happen at variable and unpredictable times and locations. Current detection technologies are not rapidly deployable and requisite wind data may not be readily available to track these emissions. Unlike oil and gas pipelines, where process data is readily available, landfills do not possess the granular data at this point in time to apply where such emissions may occur, such as for example, a header break.

Aerial and satellite detection of emissions from municipal solid waste landfills will be limited in accordance with the detection threshold of the relevant technology. Vendors have indicated that satellite technologies cannot detect emissions at rates below 100 kg/hr.[21]

2. Extrapolating point-in-time measurements into hourly and annual emission rates is inappropriate.

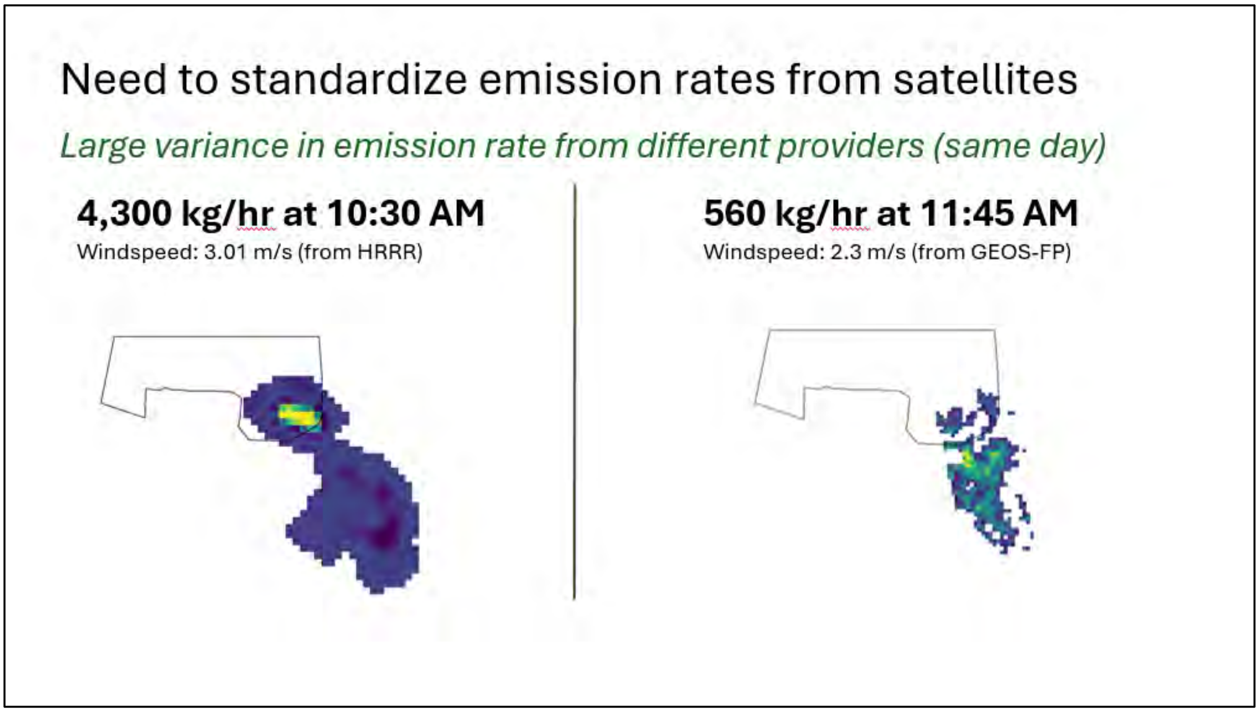
Though emerging measurement technologies purport to be capable of providing hourly and annual total methane emission estimates for specific municipal solid waste landfill facilities, there are shortfalls to their approach: (1) the approach does not differentiate between quantification methods for municipal solid waste landfills and oil and gas facilities; (2) the technologies cannot quantify point-in-time emissions rate with great enough certainty; and (3) the methodologies used to extrapolate point-in-time measurements into annual emission rates do not accurately capture emissions from individual facilities.

Vendors of fixed-sensor and UAV drone-based technologies have indicated their ability

[21] These threshold limitations may be resolved with a "stacked" approach, described in further detail *infra* in Section II.F.1. However, additional research and development is necessary to understand the capabilities of such an approach before its use in any regulatory determinations.

to calculate whole-site emissions using a mass balance approach. However, both fixed sensors and UAV technologies have spatial limitations that lead to unacceptable levels of uncertainty. Moreover, vendors of these technologies have not indicated that their approach in detection and quantification is unique to landfills, except for the use of site-specific data—however, how such data is utilized is generally proprietary and likely differs amongst vendors. Republic Services conducted a pilot study to evaluate the capabilities of metal oxide fixed sensors, a type of ground-based continuous emissions monitoring sensor. The specific metal oxide fixed sensors were originally designed for oil and gas facilities with the primary objective to identify significant emission events, with priority given to avoiding false alarms. With respect to landfills, the priority is less about detecting significant events, and more about identifying trends in overall methane emission, such as reductions caused by implementing capture systems. When Republic first deployed metal oxide fixed sensors, the plume model logic was identical to what is used on oil and gas facilities. The largest uncertainty in the plume model calculation is the distance between the sensor and the source, which feeds in to estimating the plume width and height. In February, Republic tested a new implementation of that distance estimate that ultimately did not yield significantly better results. From these learnings, an improved landfill model that eliminates the source to sensor distance in calculating the plume width needs to be developed and will take several months to deploy to assess the effectiveness of the changes.

With respect to satellite technologies, both Carbon Mapper and GHGSat have made their detection and quantification processes publicly available. However, neither indicate that they use an approach specific to landfills. Moreover, the approaches are not the same, and are therefore unlikely to yield the same results, indicating the need for better standardization amongst the same technologies. This issue has played out in practice when comparing emission rates estimated by one or more vendors evaluating the same plume. For example, as depicted below, at one landfill site, two measurements taken at very close points in time by different satellite measurement vendors were used to calculate very different emission rates. Despite being observed at nearly identical points in time, Vendor 1 calculated an emission rate of 4,300 kg/hr while Vendor 2 calculated an emission rate of 560 kg/hr.



Although extrapolation of point in time measurements to hourly and annual emission rates has been done by advocacy organizations using satellite and aerial data, NWRA does not believe that such extrapolation is accurate or appropriate. For example, a landfill methane emission map made available on EDF's website[22]would suggest large discrepancies between GHGRP reported emissions and emissions quantified using aerial and satellite measurements. However, a close review of the data reveals several points which tend to undermine these conclusions.

EDF extrapolated data from Carbon Mapper and TROPOMI to calculate hourly annual emission rates, without disclosing its calculations and methodology and explaining its decision not to include additional publicly available data from Carbon Mapper's database (e.g., EMIT data). Moreover, the very process of extrapolating point-in-time measurements to calculate an hourly annual emission rate irreconcilably clashes with the nature of emissions reported under the GHGRP. In particular, the emissions reported under the GHGRP are not annualized hourly emission rates, nor does the nature of landfill emissions lend itself to an assumed hourly rate. Further, there is limited value in reducing one or more remote observations to an assumed hourly emission rate based on a very limited data set - as the limited data set itself is evidence that more observations would likely lead to more agreement between reported and observed values.[23]

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[22] Environmental Defense Fund, *America's Hidden Landfill Emissions*, https://landfills.edf.org/interactive/ (last visited Nov. 22, 2024).
[23] As generally noted by *Cusworth, et al*., correlation between GHGRP reported values and values derived from remote measurements increase with increased numbers of measurements. Cusworth, et al., *Quantifying methane emissions from United States landfills*. 383 SCIENCE 1499, 1503 (2024) ("On average, aerial emission rates were a factor of 2.7 higher than GHGRP for all landfills and a factor 1.4 higher for landfills with 10+ unique overpasses.").

Moreover, there are several unexplainable transcription errors between the underlying data and the public-facing aspects of the map that have resulted in the display of emission rates that cannot be made sense of. And finally, even if the comparison of derived emission rates are taken at face value, the map would tend to show that many landfills are overreporting data when detection-derived values are compared to GHGRP reported values.

Thus, while particular vendors may have applicable internal standardization processes that would enable them to calculate annual emission rates, such calculations may not be meaningful where the applied processes and algorithms are not verifiable or consistent amongst technologies and are not transferrable among various sites. Quantification approaches for municipal solid waste landfills, if used for any regulatory purpose, for consistency should be limited to use of specific methodologies depending on the type of technology being deployed catering specifically to municipal solid waste landfills (*i.e.*, is not source agnostic). Until a consistent standardization process for each technology type exists that is unique to municipal solid waste landfills, these technologies are not ready for implementation into the municipal solid waste landfill regulations.

a. Too much uncertainty exists with respect to the detection and quantification abilities of emerging technologies to justify any regulatory switch from a modeled quantification approach to a measured one.

Under the GHGRP, as well as for other regulatory purposes, landfills have applied a modeled approach to emissions quantification. The modeled approach has been periodically updated; most recently in the 2024 Subpart HH Revisions. The finalized updates to Subpart HH are scheduled to become effective on January 1, 2025, and include revisions to emissions calculation equations applicable to landfills so as to account for periods of time where facilities' gas collection and control systems are not operating "normally." Accordingly, emissions of landfill gas that will occur as a result of operational inconsistencies and "large release events"—which EPA's ORD has referred to as "fugitive" or episodic emissions—will be accounted for within the updated modeled approach under the GHGRP. *See* Supplemental Proposal, 88 Fed. Reg. at 32877. These revisions will be implemented within 40 C.F.R. § 98.343, which includes several equations used to model methane emissions from municipal solid waste landfills. Equation HH-6 is used to "calculate CH4 emissions from the modeled CH4 generation and measured CH 4 recovery":

$$\text{Emissions} = \left[\left(G_{CH4} - \sum_{n-1}^{N} R_n\right) \times (1-OX) + \sum_{n-1}^{N} \left\{R_n \times \left(1-\left(DE_n \times f_{Dest,n}\right)\right)\right\}\right] \quad \text{(Eq. HH-6)}$$

$F_{Dest,\,n}$ was revised to mean the following:

> Fraction of hours the destruction device associated with the nth measurement location was operating during active gas flow calculated as the annual operating hours for the destruction device divided by the annual hours flow was sent to the

> destruction device. *The annual operating hours for the destruction device should include only those periods when flow was sent to the destruction device and the destruction device was operating at its intended temperature or other parameter indicative of effective operation. For flares, times when there is no flame present must be excluded from the annual operating hours for the destruction device.*

See 2024 Subpart HH Revisions, 89 Fed. Reg. at 31939 (emphasis added).

Similarly, Equations HH-7 and HH-8 are used to "calculate CH4 generation and CH4 emissions using measured CH4 recovery and estimated gas collection efficiency":

$$MG = \left[\frac{1}{CE}\sum_{c=1}^{C}\left[\frac{\sum_{x=1}^{X} R_{x,c}}{f_{Rec,c}}\right] \times \ (1 - OX)\right] \quad \text{(Eq. HH–7)}$$

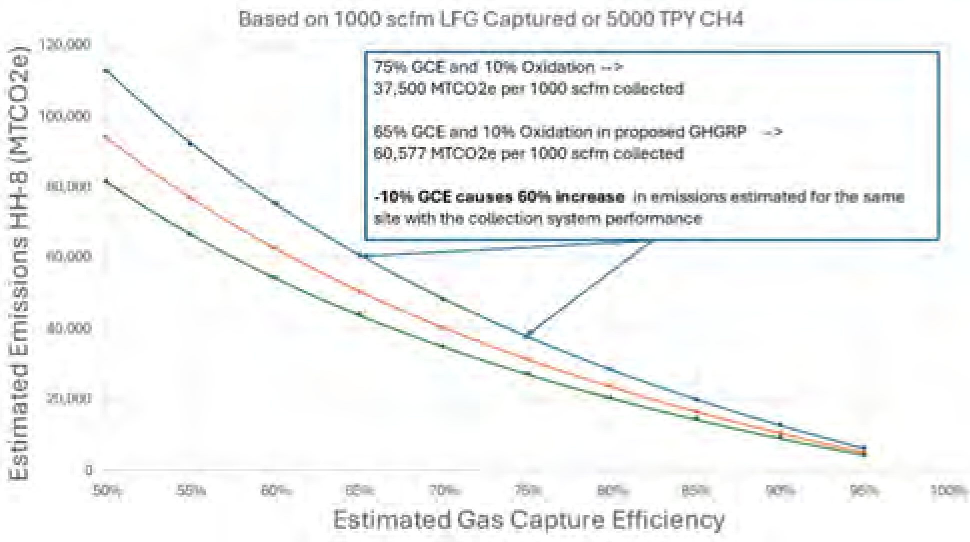
$$\text{Emissions} \ = \ \left[\left(\frac{1}{CE}\sum_{c=1}^{C}\left[\frac{\sum_{x=1}^{X} R_{x,c}}{f_{Rec,c}}\right] - \sum_{n=1}^{N} R_n\right) \times (1 - OX) + \sum_{n=1}^{N}\left\{R_n \times \left(1 - \left(DE_n \times f_{Dest,n}\right)\right)\right\}\right] \quad \text{(Eq. HH–8)}$$

EPA updated the definition of $f_{Dest,n}$ as it pertains to HH-7 and HH-8 in the same way as it pertains to HH-6. Moreover, $f_{Rec,c}$ was updated to mean the following:

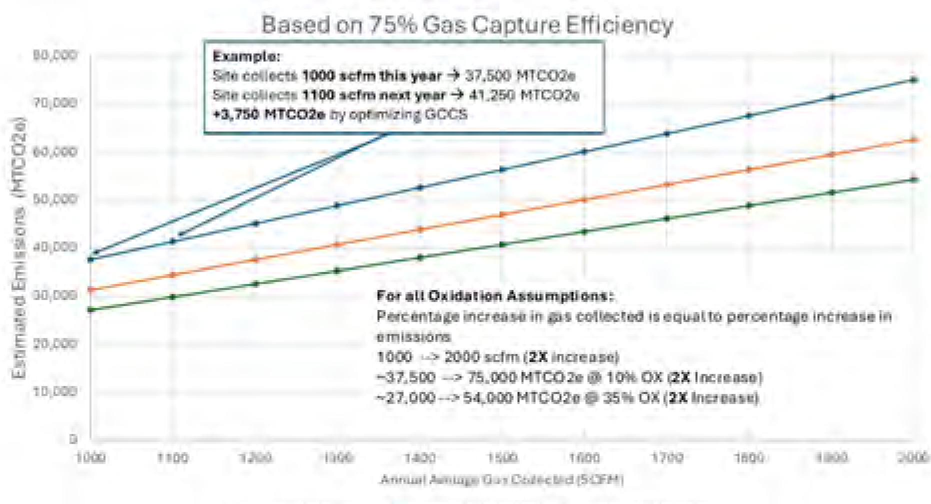
> Fraction of hours the landfill gas collection system "c" *was operating normally* (annual operating hours/8760 hours per year or annual operating hours/8784 hours per year for a leap year). *Do not include periods of shutdown or poor operation, such as times when pressure, temperature, or other parameters indicative of operation are outside of normal variances, in the annual operating hours.*

See 2024 Subpart HH Revisions, 89 Fed. Reg. at 31939 (emphasis added).

Accordingly, both the revised definitions of $f_{Dest,n}$ and $f_{Rec,c}$ are intended to account for periods of operational anomalies, so as to reflect when gas collection was reduced and/or when emissions were greater than typical. To the extent that EPA believes that emerging measurement technologies would account for emissions that occur as a result of operational anomalies, it is imperative that EPA understand that those events are already accounted for by the modeled structure under Subpart HH. Indeed, by reducing Table HH-3 collection efficiency values based on assumptions derived from emerging measurement technologies, EPA has vastly overcorrected the perceived impacts of these so-called "large release events," and in so doing, has unfairly penalized landfill owners and operators by removing their ability to demonstrate reductions in emissions correlated with improved performance. As depicted below, the 10% mandated reduction in collection efficiency in GHGRP calculations results in an increase of 60% in reported emissions.



NWRA does not agree with this result or the basis on which it was determined, and believes that the mandated use of a "one-size-fits-all" reduced collection efficiency will tend to undermine, rather than support, incentives for improved site-specific performance. This is due in part to the assumption included in the finalized version of Equations HH-7 and HH-8: where gas collection increases, so does gas production and therefore, gas emissions. Under this assumption, the percentage increase in emissions becomes equal to the percentage increase in gas collected, as shown in the figure below:



In this respect, the 2024 Revisions to the GHGRP actually disincentivize greater gas collection, thereby disincentivizing investment in GCCS and impeding NWRA members' abilities to meet their emission reduction goals.

NWRA pointed out in its Petition for Reconsideration of the 2024 Subpart HH Revisions that satellite technologies currently involve too much uncertainty to justify their use in the regulatory realm.[24] For example, in the *Nesser* study cited by EPA in 2024 Subpart HH Revisions, the authors alleged that 77% of observed landfills underreported GHG emissions. However, 15 of 38 of the observed municipal solid waste landfills with gas collection and control systems were within the reported range of uncertainty.[25] While academic and advocacy papers do include uncertainty values in their supporting data, this detail and its import is often lost in the public-facing messaging surrounding this data, and likewise appears to not have been duly considered by EPA. In short, such large uncertainty values evidences the need for a more accurate approach to calculating annual rates.

Further, as discussed above, the uncertainties associated with each technology evaluated as part of the First EREF Controlled Release Study are varying and too large for justification within a regulatory program. Accuracy and certainty are of the utmost importance in the event EPA seeks to transition to a measured approach and away from the decades-old, modeled approach. EPA should feel justified in doing so only to the extent that emerging technologies prove that they can achieve the required degree of certainty, and can "quantify annual methane emissions under the GHGRP in a robust, transparent, accurate, standardized, and verifiable way."[26]

E. At this time, emerging technologies are not transparent, open-source, or standardized[27]

To the extent that academic papers have attempted to evaluate and quantify municipal solid waste landfill emissions using emerging measurement technologies, their conclusions are not well-founded or technically accurate and therefore cannot support the inclusion of such technologies into regulatory reporting or other requirements. For example, EPA cited to *Nesser*, et al. for the general proposition that "recent aerial studies indicate methane emissions from landfills may be considerably higher than bottom-up emissions reported under subpart HH for *some* landfills" and further noted that such higher emissions may be attributable to "poorly operating gas collection systems or destruction devices and leaking cover systems." [28] However, the *Nesser* study only observed 38 landfills using 2019 satellite (TROPOMI) data at approximately 25 x 25 km resolution to estimate methane emissions for grid cells in the contiguous United States with 2012 reported methane emissions larger than 0.1 Mg /(km year).[29] The study used low spatial resolution satellite data, which makes attributing emissions to specific landfills very difficult.[30] Moreover, the inversion model was not strongly sensitive to landfill

[24] *See* Exhibit 1, Petition for Reconsideration, at 26.
[25] *Id.* (discussing Nesser et al., *High-resolution US methane emissions inferred from an inversion of 2019 TROPOMI satellite data: contributions from individual states, urban areas, and landfills*, ATMOSPHERIC CHEMISTRY & PHYSICS 5069 (2024).
[26] *See* RFI, 89 Fed. Reg. at 70178.
[27] The text in this subsection is responsive and relevant to all of the questions contained in the RFI.
[28] 2024 Subpart HH Revisions, 89 Fed. Reg. at 31854 (emphasis added).
[29] *Nesser*, et al., at 2, 4. NWRA's concerns regarding the *Nesser* paper can be found in greater detail in its Petition for Reconsideration. *See* Exhibit 1, at 25–28.
[30] Oil and gas researchers have cautioned against using TROPOMI, and satellites generally, for point-in-time measurements. Dubey, et al., *Minimum detection limits of the TROPOMI satellite sensor across North America and their implications for measuring oil and gas methane emissions*, 872 Science of the Total Env't, 2 (2023). ("Due to the quantity of emissions that can be captured in a single overpass, TROPOMI, and satellites in general, should be

emissions, and the authors rely on the 2012 inventory as the default emissions if not enough data was available to produce an optimized estimate. This approach ignores any changes that occurred at individual facilities between 2012 and 2019—potentially leading to the mis-attribution of emissions from sources that did not report in 2012. EPA also cited a paper by *Oonk* et al. to support its contention that "subpart HH underestimates the actual methane emissions released from landfills."[31] But *Oonk* et al. observed landfills in Holland, presented very little site-specific information on the observed landfills, and used the emissions measurement methods that were not well developed at the time, including modeled gas generation, which introduces additional uncertainty.[32] Similarly, EPA's reliance on a paper by *Duan* et al. is misplaced, as the study focused on 23 landfills in Denmark, and noted significant differences between Danish landfills and those in the U.S.[33]

Another paper by *Balasus*, et al. used wind-rotated oversampling of TROPOMI observations for each year from 2019 to 2023 to construct annually averaged methane plumes with 1 × 1 km2 resolution from four large Southeast U.S. landfills using the cross-sectional flux method (*Varon* et al. 2018) to quantify total annual emissions and uncertainties from the individual landfills.[34] The paper concludes that the generation-first model under the GHGRP conforms more with the measured results from the TROPOMI observations but that landfills with gas collection and control systems prefer to utilize the recovery-first model which "yields emissions that are one-quarter of those from the generation-first model[.]"[35] However, the conclusions from *Balasus*, et al. mischaracterize the relationship between Equations HH-6 and HH-7 and 8. The paper fails to acknowledge that landfills cannot use the recovery-first model under Equations HH-7 and HH-8 unless they have GCCS. Landfills do not have a GCCS until there is sufficient waste in place. Equation HH-6 is based on tonnage, which means that calculated emissions will ramp up quickly during initial operation.

Landfills generally begin installing GCCS infrastructure when they reach intermediate grades and elevations. Upon and after installation of GCCS infrastructure, landfills, of course, begin gas capture. When a landfill develops sufficient GCCS coverage across its footprint, Equations HH-7 and HH-8 can be appropriately used to calculate fugitive methane emissions. Considerable thought is taken as to when it becomes appropriate to transition away from the use

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used with caution. There is little use in using TROPOMI for a single measurement, but sustained measurements over a long period of time have great benefit. This optimal use of TROPOMI should be reflected in the policies that are developed moving forward.").

[31] 2024 Subpart HH Revisions, 89 Fed. Reg. at 31855.

[32] Oonk, H., *Efficiency of landfill gas collection for methane emission reduction. Greenhouse Gas Measurement and Management*, 129 (2012), https://doi.org/10.1080/20430779.2012.730798.

[33] NWRA commented extensively in its Petition as to the issues associated with EPA's reliance on the *Duan* et al. paper. *See* Exhibit 1, at 28–30 (discussing Duan, Z., et al., *Efficiency of gas collection systems at Danish landfills and implications for regulations*, 139 WASTE MANAGEMENT 270 (2022).

[34] Balasus, N., et al., *Satellite monitoring of annual US landfill methane emissions and trends* (Pre-publication) (2024).

[35] *Id.* at 1. It is important to reiterate that TROPOMI uses a low spatial resolution satellite data, making attribution to specific landfills difficult. Studies geared toward the oil and gas sector have stated that TROPOMI is less suitable for quantifying emissions from individual facilities than another satellite. Dubey, et al., *Minimum detection limits of the TROPOMI satellite sensor across North America and their implications for measuring oil and gas methane emissions*, 872 SCIENCE OF THE TOTAL ENV'T, 2 (2023). Moreover, TROPOMI is in sun-synchronous orbit so sites are observed as a single, non-representative time of day.

of HH-6 and to the use of Equations HH-7 and HH-8, in order to avoid grossly underreporting a recovery-first value. While there is a discrepancy between the results of Equation HH-6 versus Equation HH-8, it is not as distinct as *Balasus* alleges. And while another study by *Stark* et al. iterates the position that more operators "preferentially select the [Equation HH-8] method over the [Equation HH-6] method," the study acknowledged that "the purpose within GHGRP for having two different emissions estimation methods is to give the operators flexibility if good operating practices are employed that would likely result in decreased emissions from the site." *Stark* et al. also opined that the "default values for many of the parameters of the [Equation HH-6 approach]" themselves "retain high uncertainty."[36]

Moreover, as landfills start to reach maturity, incoming tonnage remains consistent, thereby causing the results of Equation HH-6 to "level off" to some extent, reducing the discrepancy between the results of Equation HH-6 and HH-8. As landfills reach final capacity, incoming tonnage begins to decrease, causing the results of HH-6 to "ramp down." As gas flows remain constant for a number of years post-closure, the results of Equation HH-8 do not decrease significantly—as a result, the use of Equation HH-8 causes overreporting compared to HH-6.

Balasus et al. wrongfully assumes that landfill operators simply pick the equation leading to lower resulting emissions. In reality, operators use site-specific knowledge to utilize the equations in the way that most appropriately comports with the actual conditions at the landfill. Often times, operators chose the more conservative outcome. For example, a WM landfill that stopped accepting waste five years ago and is fully capped, still reports significant calculated emissions due to gas production under Equation HH-8, despite the fact that HH-6 would result in nonexistent or even negative emissions. In addition, *Balasus* et al. used a method for quantifying emissions based on oversampling the low-resolution data—and this method has *not* been validated in any setting, particularly via controlled release or with other site-specific methods. The *Balasus* et al. study was also purposely conducted at four isolated landfills, to avoid interference of emissions from other, nearby sources. But this approach fails to acknowledge the realities facing many existing, operational landfills: namely, that emissions from nearby sources may indeed be misallocated to landfills.[37] There are agricultural sources of methane adjacent to one or more landfills that are contributing to the methane observations that are not discussed in the paper. Accordingly, EPA should not rely on *Balasus* et al. when considering whether and how to alter the modeling scheme under the GHGRP or dispense with it entirely by switching to a measured approach.

EPA has also indicated its intent to rely on a paper by *Cusworth*, et al.[38] But the conclusions in *Cusworth*, et al. support the contention that advanced measurement technologies are not primed for use in detecting, quantifying, and extrapolating annual emissions from municipal solid waste landfills without further research and development. Indeed, *Cusworth*, et al. concludes that "direct measurements of CH4 emissions at landfills to date using surface or aircraft instruments have largely been limited to a small number of facilities due primarily to

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[36] *See* Stark et al., *Investigation of U.S. landfill GHG reporting program methane emission models*, 186 WASTE MANAGEMENT 86-93, at 87-88 (2024).

[37] *See* Nesser, et al. at 5079 (stating that some emissions from "co-located" oil and gas facilities may have been "misallocated" to the studied landfill).

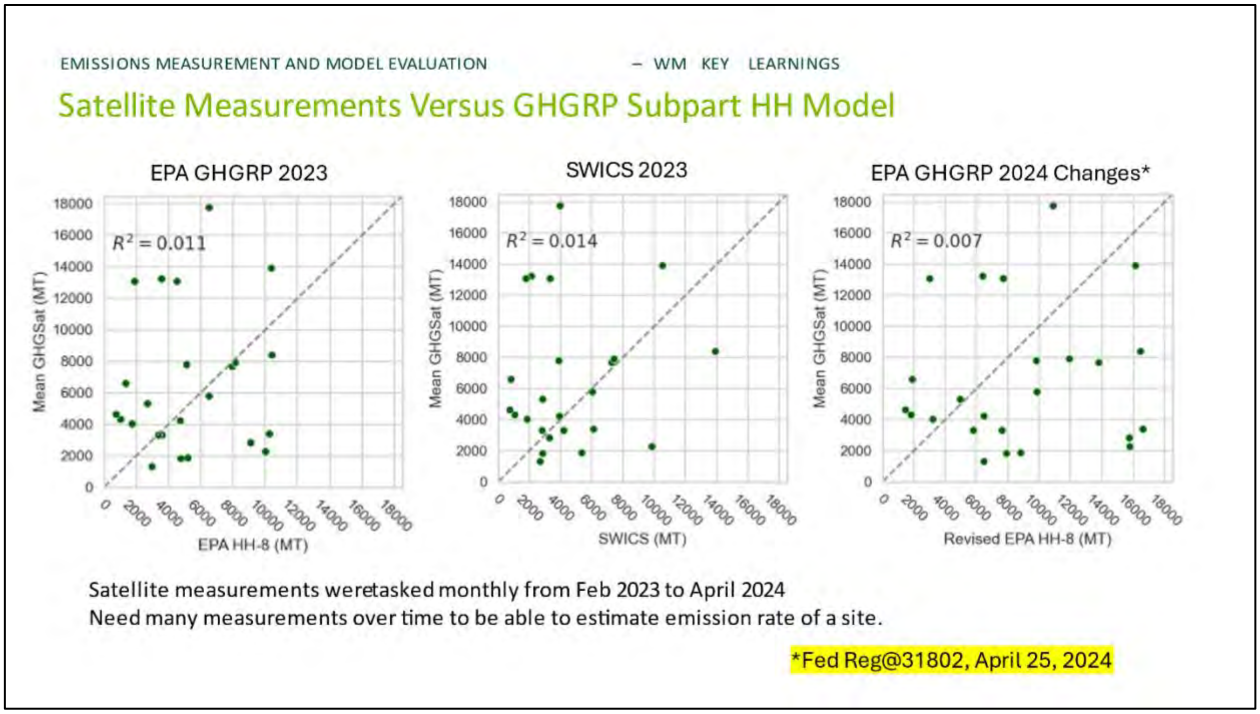
[38] Cusworth, et al., *Quantifying methane emissions from United States landfills*. 383 SCIENCE 1499, 1499 (2024).

cost, which has resulted in incomplete spatial and temporal sampling. Given the diversity of operational and environmental factors driving landfill emissions, these observational limitations lead to continued uncertainty in this sector's contribution to regional, national, and global CH4 emission inventories, which can complicate assessing the efficacy of emission mitigation efforts."[39]

Each of these studies tended to focus on larger landfills above certain emission rates; they are therefore not representative of the national body of existing landfills subject to regulation under the GHGRP or NSPS/EG. For example, the *Nesser*, et al. paper does not include landfills with reported 2019 emissions below 300 kg.hr—approximately half of the landfills reporting under the GHGRP fall within this category.

Site-specific studies by NWRA members have also demonstrated the limitations of emerging measurement technologies for landfill gas emission quantification. In one example, WM undertook a twenty-five landfill study, using satellite measurements taken monthly from February 2023 to April 2024, to compare emissions quantified under pre-2024 GHGRP method, using the collection efficiencies required by the 2024 Subpart HH Revisions, and using Solid Waste Industry for Climate Solutions ("SWICS") Methodologies.[40] The comparison showed mixed results in terms of correlation, including that some sites would be overreporting, and some underreporting relative to both GHGRP methods. As a general matter however, the 2024 Subpart HH Revisions tended to result in more overreporting than underreporting when compared to data derived from emerging measurement technologies. In addition, of the three methodologies, SWICS was most consistent with data derived from satellite measurements, and as explained below is most responsive to real-time operational observations at municipal solid waste landfills. WM's study results are depicted below.

[39] *Id.*
[40] The SWICS model is discussed in greater detail *infra* in Section II, Subsection I.



F. At this time, emerging technologies can be used as a tool to support landfill gas collection and control practices, in conjunction with site-specific data.[41]

1. A "stacked" or "tiered" approach to the use of emerging technologies would allow for research and development as well as a better understanding of landfill emissions.

Representatives from EPA's ORD noted in their presentation at the Landfill Workshop that emerging measurement technologies are poised for a "stacked" or "tiered" approach at this time. This conclusions reflects those of recent scientific studies.[42] When asked what the "ideal" stacked approach would look like, ORD's representatives stated that satellite images should be supplemented with ground-level data from continuous sensors and UAV devices.

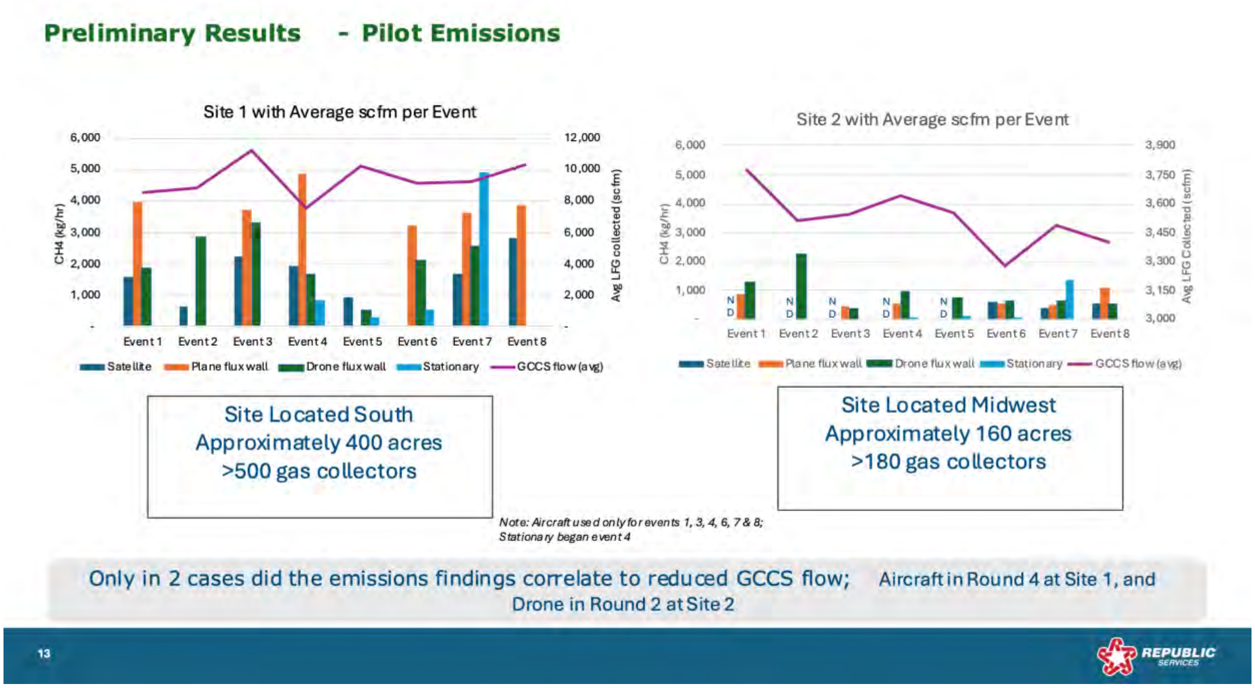
At this time, it remains unclear how a stacked or tiered approach could be implemented into the various regulatory programs, and whether and how remote sensing or direct measurement aerial technologies would be used for specific purposes—*i.e.*, to replace the use of Method 21; to detect large emission events; to quantify annual emission rates for reporting purposes. To the extent that these technologies could be utilized in the near-term, such uses should comport with existing work practices under applicable rules, particularly as means to replace or bolster Method 21 for SEM. This approach aligns with ORD's indication that the

[41] The text in this section is responsive to RFI Questions 1.c; 3.b; and 3.c.

[42] *See Cusworth, et al.*, at 1503 ("On average, aerial emission rates were a factor of 2.7 higher than GHGRP for all landfills and a factor 1.4 higher for landfills with 10+ unique overpasses. Consistent with this study, independent assessments of US emission inventories have indicated a needed 1.25 to 1.5 scaling of waste emissions to reconcile inventories with in situ ground-based measurements and coarse resolution satellite observations.")

technologies are poised to aid in the understanding of fugitive or episodic emissions in the near-term, and intrinsic emissions in the long-term.[43] NWRA agrees that the technologies may be useful for find-and-fix approaches, wherein Method 21 could be supplemented with UAV devices to help identify the origin of fixable emissions so as to apply a timely response and correction. This approach would fit more squarely within the NSPS/EG realm of regulations, rather than the GHGRP.

A stacked approach could be valuable for understanding annual emissions, but additional research and development is necessary to understand how it could fit within the regulatory scheme of the GHGRP and to what extent, if any, such stacked data could be utilized to quantify emissions. As indicated by ORD representatives, UAV and ground-based devices could be used to verify the emissions detected by satellite and aerial images. To account for the detection threshold limitations of satellite devices—which typically cannot identify emissions events less than 100 kg/hr—UAV and ground-based technologies could be used to collect more consistent data at lower detection thresholds. However, the protocol, algorithms, and procedures would be needed to integrate estimates of methane emissions for sources emitting below detection thresholds, and would need to produce correlated data. Such correlation has not yet been observed by NWRA and its members. As one case in point, Republic Services sought to correlate contemporaneous data collected at two sites by various technologies, and saw wide disparities in the resulting estimates, as depicted below:



These disparities are attributable to the lack of standardized methods, detection limits that vary by technology, unique algorithms for processing atmospheric data, and challenges posed by weather, topography, diurnal impacts and ongoing construction. Initial findings also indicate the

[43] *See* Exhibit 3, EPA webinar materials, *Airborne Survey-Methane from U.S. Landfills*, at slide 13.

size of the landfill may impact the uncertainty of the emissions.

Ultimately, researchers have concluded that a "method that can measure both the diffuse and point-source emissions from landfills" does not exist and "is needed to validate or refute the current GHGRP approaches."[44] And, rather than shift entirely from a modeled to measured approach, researchers suggest that the emerging technologies be developed to "improve the models" instead.[45] This idea—that " a combination of technologies (i.e., on-site sensors and possibly satellite or aerial platforms) are needed to better quantify annual emissions from MSW landfills"—comports with ORD's indication that technologies are only poised for a "stacked" approach at this time.[46]

G. *EPA's verification process of advanced measurement technologies should comport with the standards applicable to Other and Alternative Test Methods.*[47]

EPA currently employs a multi-step process for standardizing regulatory test methods. Test methods must first be designated as an Other Test Method ("OTM"), and then an Alternative Test Method, before EPA can point to it as a Reference Method for compliance purposes within the NSPS or NESHAP programs. To go from an OTM to an Alternative Test Method, the EPA must be assured that the test method alternative provides "a determination of compliance status at the same or greater stringency as the test method specified in the applicable regulation," which should be shown by including the results of a Method 301 (Validation of Pollutant Measurement Methods from Various Waste Media) validation and justification for not using the regulation's specified method, which compares the test method against a validated reference test method to determine the method's bias and collecting multiple or co-located simultaneous samples to determine the method's precision.

The only methodologies currently approved as Alternative Test Method to Method 21 so as to satisfy the SEM requirements under the NSPS/EG is ALT-150/OTM-51: *Approval to Use Unmanned Aerial System Application as an Alternative to Method 21 for Surface Emission Monitoring of Landfills*. Because ALT-150 was approved in accordance with EPA's procedures, its implementation is the only transparent, open-source, standardized option that exists among the new advanced measurement technologies. However, Method 21 is applicable to SEM requirements under the NSPS/EG, rather than as a means to quantify emissions for the purpose of calculating annual emissions.[48]

EPA should continue to employ this or a similar process with respect to other technologies that it into future rulemakings, so as to provide clarity on how the technologies should be deployed and what they aim to achieve from a regulatory standpoint. Namely, EPA should employ a similar multi-step approval process for any technologies purporting to (1) be a viable alternative to Method 21 for SEM; (2) be capable for use in detecting large-scale

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[44] *Stark et al.*, at 91.
[45] *Id.*
[46] *Id.* at 92.
[47] The text under this section is responsive to RFI Questions 3.a and 3.b.
[48] OTM-58A is in draft form and uses a mass balance approach to quantify whole site emissions. NWRA applauds EPA on its collaboration with Champion X in developing additional test methods; however, OTM-58A is not scalable, and a scalable methodology should be high priority for landfills.

emissions events, or (3) be suitable for quantifying emissions and/or calculating an annual emission rate. EPA developed a streamlined process applicable to oil and gas facilities, which can be found under 40 C.F.R. § 60.5398b(d). If EPA intends to move forward with new technologies for landfills, EPA must consider developing a similar process, which would allow for the qualification of "alternative" test methods that can be utilized for compliance purposes even after the rule has become effective. This process allows for the continued development of appropriate technologies without rushing to implement emerging technologies into regulatory programs before they are sufficiently ready. In establishing this process, EPA should prioritize its goal to "peer review of all scientific and technical information that is intended to inform or support Agency decisions is encouraged and expected."[49] This is especially important for verifying and standardizing technologies for emissions detection, quantification, and extrapolation into annual emission rates as no current validated reference method exists.

Further, standards and protocols implemented to ensure that emerging measurement technologies provide annual total, source-specific, methane emissions in a transparent and standardized way should not be source or technology agnostic. As stated above, there are stark, important differences between oil and gas facilities and municipal solid waste landfills. These differences would make source agnosticism among standardized methods wholly inappropriate, as the detection and quantification of oil and gas emissions from landfills is subject to a different set of considerations than methane emissions from oil and gas facilities. As an example, Carbon Mapper has indicated that it cannot automate source attribution when evaluating its satellite and aerial images, and must do so manually in order to distinguish emissions from oil and gas facilities versus those from landfills.[50] Accordingly, without the capability to distinguish between and attribute emissions from landfill and oil and gas facilities, source agnosticism is not an appropriate option. In fact, TROPOMI satellite research has shown that the imaging may attribute emissions from oil and gas facilities to nearby landfills: "[o]ur landfill attribution approach, which relies on a prior estimate from 2012, may therefore misallocate emissions to the Puente Hills Landfill instead of to co-located oil and gas operations." [51] As such, the development and standardization of advanced technologies must be made as specific as possible to municipal solid waste landfills in order to be primed for regulatory use.

Standards and protocols should be specific to the type of method used rather than be technology agnostic. At this point in time, nearly all of the emerging technologies available require further development and refinement. There are significant differences between the purported algorithms employed by ground-based, fixed sensors compared to UAV technologies, compared to aerial technologies, compared to satellite technologies including, but not limited to, implementation of meteorological and atmospheric data using anemometers, conversion methodologies, algorithms employed to calculate emission rates, and algorithms employed to extrapolate data into annual emission rates. Many of these algorithms are proprietary and/or still in the process of being developed. Moreover, until it becomes clear whether and how EPA intends to implement advanced technologies into the regulatory programs, a comment on technology agnosticism is inherently incomplete.

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[49] EPA. *Peer Review and Peer Involvement at the U.S. Environmental Protection Agency*, (Jan. 2006) https://www.epa.gov/sites/default/files/2015-01/documents/peer_review_policy_and_memo.pdf
[50] *See* Carbon Mapper Quality Control Description Document, at 5–6.
[51] *Nesser*, et al., at 5079.

H. *Other limitations relating to the use of advanced technologies for GHGRP reporting purposes*[52]

The greatest limitation to using advanced measurement technologies under the GHGRP would be the transition from a modeled to measured approach of emissions quantification. This transition would require reconciling the bottom-up emissions estimates that the industry has utilized since the beginning of the GHGRP with the top-down approach that would be applied in a measured system, the limitations of which are set out at length above.

Costs present another major barrier and limitation to switching to a measured approach under the GHGRP. In directing EPA to create the GHGRP, Congress stated that a "comprehensive and effective national program of mandatory market-based limits and incentives on emissions of greenhouse gases" should be implemented to "slow, stop, and reverse" emissions in such a way which does not "significantly harm the United States economy."[53] Congress issued an accompanying joint statement directing EPA to use its existing authority under the federal Clean Air Act, 42 U.S.C. § 7401 *et seq.*, to develop the mandatory greenhouse gas reporting rule. EPA finalized its first version of the GHGRP on October 30, 2009, utilizing its information-gathering authority under Section 114 of the Clean Air Act.[54]

Accordingly, in issuing and revising the GHGRP, EPA has traditionally considered costs of compliance. Costs of compliance will depend on whether and how EPA implements the use of advanced technologies into regulatory determinations. For example, if EPA provides that certain technologies can be used as alternatives to Method 21 to conduct quarterly SEM, then cost of compliance could consider the baseline estimates in accordance with the dollar amounts revealed in the First EREF Controlled Release Study, set forth below:[55]

MGPA 1	$5,000/day
MGPA 2	$5,000/day
UPSEA 1	$5,000-8,000/day
UPSEA 2	$5,000-8,000/day
MTCEA	$5,000/day
APSEA	$14,000/day
LiDAR	$14,000/day
SISEA	$3,000-6,500/package
RPSEA 1	$7,000-30,000/year
RPSEA 2	$7,000-30,000/year
RPSEA 3	$7,000-30,000/year
UCSEA 1	$5,000-8,000/day

[52] The text in this section is responsive to RFI Question 3.c.
[53] 121 Stat. 1844, 2152, Pub. Law 110-116 (Dec. 26, 2007).
[54] *Mandatory Reporting of Greenhouse Gases*, 74 Fed. Reg. 56260, 56264 (Oct. 30, 2009).
[55] It is important to note that these rates were estimated particular to the study and may not be transferrable to practical implementation in the regulatory context. Moreover, the costs listed fail to account for vendor-specific context. For example, one drone may be able to fly a single site in one day, whereas another vendor may take five days to fly the same site.

UCSEA 2	$5,000-8,000/day
LEA	$5,000/day

However, as stated previously, the correlation between the GHGRP reported emissions and emissions quantified using aerial and satellite technologies increases with additional measurement events.[56] Thus, it is unclear, at this point, how often municipal solid waste landfills could be subject to utilizing such technologies for the purposes of calculating annual emission rates. The costs could become exorbitant and unreasonable. For the purposes of calculating annual emission rates under the GHGRP, until it becomes clearer whether any technologies can be capable of detecting and quantifying emissions with an acceptable degree of accuracy and certainty, and how often measurements would be necessary to capture a substantiated and trusted annual emission rate, NWRA cannot speculate further on costs. Regardless, landfills provide an essential public service and should not be subject to unwarranted, unreasonable costs associated with advanced measurement technologies until and unless the compliance methodologies using such technologies proves to be certain and accurate enough to justify the accompanying costs.

I. Site-specific data is critical to the quantification of landfill gas emissions, and cannot be replaced by emerging measurement technologies.[57]

The members of NWRA are proposing a tool that relies on readily available site-specific information to calculate annual emissions inventories that would be sensitive to the implementation of good practices to reduce emissions. The Solid Waste Industry for Climate Solutions (SWICS) represents a group of practitioners that most recently worked to update the guidance document titled *Current MSW Industry Position and State-of-the-Practice on LFG Collection Efficiency, Methane Oxidation, and Carbon Sequestration in Landfills Version 2.2*, Revised January, 2009, and the *Methane Oxidation Addendum 2012* dated November, 2012. The updated version of guidance and associated excel tool is expected to be available in late 2024 or early 2025.

The guidance document describes how the proposed values for collection efficiency, methane oxidation, and methane destruction could be used to replace the current CARB and USEPA default values for collection efficiency (75%), methane oxidation (10, 25, 35% based on cover), methane destruction (98 - 99%). This document also provides the best estimates of carbon storage in landfills although it is not used as part of the model for estimation of methane emissions.

An important element of this update is the proposed excel tool or landfill emissions model (LEM) rating matrix which is an effort to standardize (e.g., quantify) the professional judgement using operations parameters that are typically collected and available at landfills with a GCCS. In order to use previous versions of the SWICS guidance on emission calculations the user was required to use professional judgement (aka qualified judgement) to indicate whether the performance of the GCCS cover area was high, medium, or low performance The GCCS rating matrix for each cover area utilizes four gas operations parameters and a specific rating to

[56] *See* Cusworth, et al., *Quantifying methane emissions from United States landfills*. 383 SCIENCE 1499, 1499 (2024).
[57] The text in this section is responsive to RFI Question 3.

be used for each to determine a total score which correlates to collection efficiency value. Defining the bins for each operations parameter allows tuning of the LEM to determine which landfills cover areas will be represented by one of five categories of performance, High, med-hid, medium, med-low, and low.

The SWICS Team assessed gas operations data from 399 landfills throughout the United States to determine the parameters to be included in the GCCS rating matrix and developed a scoring system derived from statistical analysis of the selected parameters combined with the professional judgement of practitioners from the contributing members of SWICS.

The rating system utilizes the following four gas operation parameters:

- Well Field Density (wells per waste footprint);
- Surface Emission Monitoring Exceedances at/over 500 ppmv methane (exceedances/acre);
- Percentage of Wellfield Positive Pressure Readings (positive readings divided by total readings *100); and
- Percentage of GCCS Uptime (running hours divided by total hours).

It is expected that the output of the LEM will be more comparable across the sector based on organizations and practitioners using the collective professional judgement of the group assembled for this effort and applied through the matrix. Refinements to the scoring bins are expected in future versions of the LEM based upon published evaluations of the operations parameters and GCCS performance.

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NWRA very much appreciates the Agency's consideration of these comments. Should you have any questions about this letter, please contact me at agermain@wasterecycling.org.

Very truly yours,

Anne M. Germain
Chief of Technical & Regulatory Affairs

Attachments:

Appendix A: RFI questions
Exhibit 1: NWRA June 24, 2024 Petition for Reconsideration
Exhibit 2: Fluxlab July 9, 2024 final report on controlled release
Exhibit 3: EPA March 19, 2024 webinar slides

Appendix A:
RFI Questions

1. *Quantification of Annual Emission Rates*
    a. *Detection and Quantification of Atmospheric Methane Emission Events from Advanced Measurement Technology*
        i. What advanced measurement technologies are currently available that can provide quantified methane emission rates using transparent, open-source, and standardized methodologies?
            1. What are the specific quantification approaches that have been used with these technologies and how have these methodologies been demonstrated and validated?
            2. How can these technologies and quantification methodologies be used to provide annual data in a consistent manner for each future year of GHGRP reporting?
            3. Are there specific detection and quantification approaches or methodologies that EPA should or should not consider?
        ii. What performance metrics and thresholds related to quantification would be appropriate to apply to advanced measurement technologies for their incorporation into the GHGRP? What would be a feasible approach for developing these thresholds and metrics?
        iii. Should quantification approaches be limited to use of specific methodologies (*e.g.*, inverse analysis, mass balance) or specific approaches for using ancillary datasets (*e.g.*, standardized interpolation of wind field products)?
        iv. Are there ongoing efforts outside of EPA to develop standards or protocols for methane emissions detection and quantification from advanced measurement technologies that would address any of the questions raised in this RFI?

    b. *Extrapolating Quantified Methane Emission Rates to Calculate Annual Emissions for GHGRP Reporting Purposes*
        i. What advanced measurement technologies are currently available that can provide annual total methane emission estimates for specific regions, facilities, processes, or equipment-level sources, that use transparent, open-source, and standardized methods?
            1. Are these technologies applicable across the entire US and could they provide annual data in a consistent manner for each future year of GHGRP reporting?
            2. Are there specific annual extrapolation approaches or methodologies that EPA should or should not consider?
        ii. What accuracy or uncertainty metrics would be appropriate for GHGRP reporting purposes?
            1. What level of accuracy in reported annual methane emissions should advanced measurement technologies be required to meet?
            2. What sources of uncertainty are necessary to consider?
            3. Are there other specific quality assurance or quality control markers that should be considered to ensure that annual estimates represent the methane emissions from all operational activities

throughout the reporting year, such as specific measurement frequencies or duration?

4. What would be a feasible approach for developing these methods and thresholds?

iii. To what extent should standards and protocols be specific to the type of methods and ancillary data used (*e.g.*, statistical approaches), and to what extent should standards and protocols simultaneously consider the specific type of emission sources being sampled (*e.g.*, large unintended vs. small routine emissions event)?

c. *Quantifying Annual Methane Emissions from Emissions Sources Below Detection Limits of Advanced Measurement Technologies*

i. What methodologies are currently available for integrating estimates of methane emissions for those sources emitting below technology detection thresholds in an open-source, transparent, and standardized way? Can these methodologies provide annual data in a consistent manner for each future year of GHGRP reporting? Are there specific approaches or methodologies that EPA should or should not consider?

ii. Should these quantification approaches be limited to the use of specific methodologies (*e.g.*, Monte Carlo method) or specific ancillary data sets (*e.g.*, the use of standardized infrastructure or operator data)?

2. *Attribution*

a. What methodologies are currently available that can attribute quantified methane emission events to specific equipment types (or additionally, specific regions, facilities, or processes) using transparent, open-source, and standardized methods? Are there specific attribution approaches or methodology trees that EPA should or should not consider?

b. What accuracy or uncertainty metrics would be appropriate for GHGRP reporting purposes? For example, what level of confidence in the source attribution would be necessary for advanced measurement technologies to meet GHGRP reporting purposes? What would be a feasible approach to developing these thresholds?

c. To what extent would standards and protocols need to be specific to the type of methods and ancillary data used(*e.g.*, infrastructure data sets) or the type of emission source sampled (*e.g.*, large unintended versus small routine emissions event)?

3. *Implementation*

a. *Structure of Approaches or Protocol*

i. What form would standard methods or protocols need to take to ensure that advanced measurement technologies provide annual total, source-specific, methane emissions in a transparent and standardized way? For example –

1. To what extent should standards and protocols be specific to the type of methods used (e.g., satellite, aircraft, ground based)? Would different standards or protocols be necessary for sampling

approaches using single platform versus multi platform measurements? Could standard methods be developed to be technology agnostic?

2. To what extent could standard methods be developed to be source agnostic? For example would standards need to be specific to the type of equipment, process, or emission source sampled (e.g., tanks, flares, pneumatic devices, landfill working face), Or could a set of standards be developed to be more broadly applicable across different GHGRP industry segments?

b. *Verification and Validation of Annual Source-Specific Methane Emission Quantification Methods Using Advanced Measurement Technologies for GHGRP Reporting Purposes*
   i. Are there approaches currently available that could be used to verify that advanced measurement technologies meet specific standards (*e.g.*, independent blind studies, deployment of calibration standards, others)?
   ii. Is it necessary to limit the applicability of advanced measurement technologies to environmental and site conditions that have been previously validated? For example, if an advanced measurement technology has been validated through blind control release testing during which wind speeds ranged from 0.5 to 10 m/s should the technology be limited to measurements within this range of wind speeds? What form of validation could be used to demonstrate whether a technology is applicable across environmental conditions outside of their tested ranges?
   iii. Are there specific types of operator- or facility-specific information that would be useful for improving or validating annual methane emissions quantification or source attribution from advanced measurement technologies?

c. *Other Considerations Related to the Use of Advanced Measurement Technologies for GHGRP Reporting Purposes*
   i. What (if any) are the current barriers or limitations to using advanced measurement technologies beyond what is currently allowed under the GHGRP to quantify annual equipment-level methane emissions at scale in the U.S.?
   ii. What are the cost considerations for implementing different advanced measurement technologies to quantify annual, equipment-, process-, or facility-level methane emissions for GHG RP reporting purposes? If available, cost should be provided in a manner that can be scaled up to different implementation approaches (*e.g.*, cost per site, cost per area covered).
   iii. How are factors such as measurement and analysis cost, complexity, or time burden relevant for determining whether advanced measurement technologies may be appropriate for annual GHGRP application?

iv. Other than methane emissions detection and quantification, and establishing the duration of [large release events] are there additional ways in which advanced measurement technologies could be used to support quantification and reporting of equipment process or facility level methane emissions to the GHGRP (*e.g.*, as a method to identify changes in operating conditions, to supplement specific reported data elements)?

EXHIBIT 1

June 24, 2024

Via Electronic Mail and Hand Delivery

The Honorable Michael S. Regan
Administrator
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Gautam Srinivasan
Associate General Counsel
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Re: **Petition for Reconsideration: Greenhouse Gas Reporting Program Subpart HH, Municipal Solid Waste Landfills**

Dear Administrator Regan and Associate General Counsel Srinivasan:

Enclosed please find attached a Petition for Reconsideration submitted by the National Waste & Recycling Association (NWRA) with respect to the rule entitled *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule*, 89 Fed. Reg. 31802 (April 25, 2024), docket No. EPA-HQ-OAR-2019-0424. NWRA's Petition for Reconsideration is limited to Subpart HH of the Greenhouse Gas Reporting Rule, which is applicable to Municipal Solid Waste Landfills, and EPA's determination therein to reduce default landfill gas collection efficiency values for reporters under the rule.

NWRA appreciates EPA's consideration of this Petition and hopes to work cooperatively with EPA toward improvements in the accuracy of landfill sector emissions reporting. Please feel free to contact the undersigned at agermain@wasterecycling.org, or outside counsel for NWRA, Carol McCabe at cmccabe@mankogold.com or Matt Morrison at matthew.morrison@pillsburylaw.com, with any questions you may have.

Respectfully submitted,

Anne Germain
Chief Operating Officer and Senior Vice President of Technical and Regulatory Affairs
National Waste & Recycling Association

Enclosure

cc: Jennifer Bohman, EPA Office of Atmospheric Programs (via electronic mail)
Julius Banks, EPA Greenhouse Gas Reporting Branch (via hand delivery)
Carol F. McCabe, Manko, Gold, Katcher & Fox (via electronic mail)
Kelly A. Hanna, Manko, Gold, Katcher & Fox (via electronic mail)
Matthew W. Morrison, Pillsbury, Winthrop, Shaw, Pittman (via electronic mail)
Steve R. Brenner, Pillsbury, Winthrop, Shaw, Pittman (via electronic mail)

The National Waste & Recycling Association's
Petition for Reconsideration of The Final Rule:
Revisions and Confidentiality Determinations for Data Elements
***Under the Greenhouse Gas Reporting Rule*,**
89 Fed. Reg. 31802 (April 25, 2024)
Docket No. EPA-HQ-OAR-2019-0424

Table of Contents

Page

PETITION FOR RECONSIDERATION TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY

I. Introduction

On April 25, 2024, the United States Environmental Protection Agency ("EPA") finalized updates to the Greenhouse Gas Reporting Program rules ("GHGRP"), codified under Title 40, part 98 of the Code of Federal Regulations and effective January 1, 2025 ("Final Rule").[1] The Final Rule is a culmination of two Notices of Proposed Rulemakings: the Data Quality Improvement Proposal and the 2023 Supplemental Proposal.[2] In finalizing the respective changes across part 98, EPA articulated its two overarching goals: (1) improving the quality of data collected from municipal solid waste ("MSW") landfills; and (2) strengthening applicable reporting requirements. The Final Rule includes updates to subpart HH of the GHGRP, applicable to MSW landfills, including unanticipated changes to methane emissions calculation methodologies that form the subject of this Petition for Reconsideration.

Specifically, in the Final Rule, EPA unexpectedly reduced the collection efficiency values contained in Table HH-3 and applied in equations HH-7 and HH-8 to calculate methane emissions from MSW landfills subject to the GHGRP ("Reporters").[3] As proposed in the 2023 Supplement, the lowered collection efficiencies would have applied only to "non-regulated" Reporters who are not required to and opt not to conduct surface methane emissions monitoring ("SEM") under applicable federal rules. EPA proposed to retain the same, higher collection efficiencies applicable to "regulated" landfills that are required to, or opt to, conduct SEM.

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[1] *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule*, 89 Fed. Reg. 31802 (April 25, 2024) ("Final Rule").
[2] *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule*, 87 Fed. Reg. 36920 (June 21, 2022) ("Data Quality Improvements Proposal"); *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule*, 88 Fed. Reg. 32852 (May 22, 2023) ("2023 Supplemental Proposal").
[3] 2023 Supplemental Proposal, 88 Fed. Reg. 32861.

Relatedly, EPA proposed to impose a new "correction term" within equations HH-6, HH-7, and HH-8 for landfills conducting SEM to adjust emissions values based on the number of locations with concentration above 500 parts per million above background identified during surface measurement periods. Taken together, EPA's proposal expressly coupled collection efficiency adjustments with SEM practices. In its Final Rule, however, EPA took an impermissible and unanticipated U-turn, decoupling collection efficiency from SEM and site-specific performance measures and imposing significantly reduced collection efficiencies across all Reporters, without adequate prelude or justification. Moreover, by requiring Reporters to apply a reduced collection efficiency irrespective of whether they are conducting SEM, EPA is effectively requiring the majority of Reporters to overstate their greenhouse gas emissions. These changes do nothing to achieve EPA's two stated goals of improving data quality and strengthening reporting requirements.

The Petitioner is the National Waste & Recycling Association ("NWRA" or "the Petitioner"). NWRA is the leading voice of the North American waste and recycling industry on advocacy, education, and safety. The industry provides essential services that benefit our local communities and businesses by assisting our customers in achieving their environmental and sustainability aspirations. NWRA supports and promotes regulatory advancements and policies that benefit the solid waste industry and improve the quality of life for all Americans. Association members operate in all 50 states and the District of Columbia and can be found in most, if not all, U.S. congressional districts. Waste and recycling facilities number nearly 18,000 scattered throughout the U.S., mirroring population centers. Our nearly 700 members are a mix of publicly traded and privately owned local, regional and Fortune 500 national and international companies. NWRA represents approximately 70 percent of the private sector waste and recycling market.

Members of NWRA are directly and adversely affected by EPA's promulgation of the Final Rule, which cannot plausibly be considered the logical outgrowth of the 2023 Supplemental Proposal. NWRA and other interested parties were not afforded adequate notice of EPA's ultimate decision to reduce existing collection efficiencies identified in subpart HH of the GHGRP for all landfills, irrespective of whether a landfill was conducting SEM. While NWRA shares EPA's stated objective of ensuring accurate quantification and reporting of greenhouse gas emissions, the Agency's finalized approach undermines that shared objective by adopting a methodology that will overestimate methane emissions, despite an abundance of scientific evidence that more closely aligns with EPA's proposed approach to base emission estimates on site-specific factors like SEM. The Final Rule will also cause reporting under the GHGRP to be at odds with other federal reporting and permitting programs, as well as the landfill sector's established practices regarding sustainability and GHG reporting.

Since EPA's decision to lower collection efficiencies in subpart HH of the Final Rule is procedurally flawed and substantively unwarranted, NWRA respectfully requests that EPA reconsider this important aspect of subpart HH of the Final Rule.[4]

II. Background to the Final Rule

In its Fiscal Year 2008 Consolidated Appropriations Act,[5] Congress directed EPA to promulgate regulations requiring "mandatory reporting of greenhouse gas emissions above appropriate thresholds in all sectors of the economy of the United States."[6] Congress articulated,

[4] NWRA has also filed a petition for judicial review of the Final Rule in the United States Court of Appeals for the District of Columbia Circuit.
[5] 121 Stat. 1844, Pub. Law 110-116 (Dec. 26, 2007).
[6] *Id.* at 2128.

in light of the "growing scientific consensus" that humans were contributing to the accumulation of greenhouse gases in the atmosphere, leading to increased global temperatures, that a "comprehensive and effective national program of mandatory market-based limits and incentives on emissions of greenhouse gases" should be implemented to "slow, stop, and reverse" emissions in such a way which does not "significantly harm the United States economy."[7] Congress issued an accompanying joint statement directing EPA to use its existing authority under the federal Clean Air Act, 42 U.S.C. § 7401 *et seq.*, to develop the mandatory greenhouse gas reporting rule.

In accordance with this Congressional directive, EPA finalized its first version of the GHGRP on October 30, 2009, utilizing its information-gathering authority under Section 114 of the Clean Air Act.[8] The original GHGRP Rule included MSW landfills that generated over 25,000 metric tons of carbon dioxide equivalent or more per year as a source category and was promulgated under Title 40 of the Code of Federal Regulations, part 98, subpart HH.[9]

Since 2009, the GHGRP has been updated numerous times.[10] On June 21, 2022, EPA published a Notice of Proposed Rulemaking ("NPRM") in the Federal Register proposing certain updates to the GHGRP, referred to as the Data Quality Improvements Proposal.[11] Thereafter, EPA issued another NPRM to supplement the Data Quality Improvements Proposal—the 2023 Supplement[12] (collectively, the "Proposed Rules")—once again seeking comment from interested parties regarding proposed changes geared toward improving the quality of data

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[7] *Id.* at 2152.
[8] *Mandatory Reporting of Greenhouse Gases*, 74 Fed. Reg. 56260, 56264.
[9] *See id.* at 56267.
[10] *Rulemaking Notices for GHG Reporting*, EPA (last updated May 31, 2024), https://www.epa.gov/ghgreporting/rulemaking-notices-ghg-reporting.
[11] Data Quality Improvements Proposal, 87 Fed. Reg. 36920 (June 21, 2022).
[12] 2023 Supplemental Proposal, 88 Fed. Reg. 32852 (May 22, 2023).

collected from MSW landfills and strengthening reporting requirements. The 2023 Supplement included proposed changes to several methodologies within subpart HH used to calculate methane emissions from MSW landfills subject to the rule.

On April 25, 2024, EPA finalized its updates to the GHGRP, including changes to collection efficiency values in table HH-3. However, the finalized collection efficiencies differed starkly from those in the Proposed Rules, specifically the 2023 Supplement. Interested parties, including the Petitioner, were completely surprised by and unprepared for this change.

A. <u>The Proposed Rules</u>

In the 2023 Supplemental Proposal, EPA proposed several changes to the GHGRP that it said would lead to more accurate emissions calculations, based on its conclusion that high emission events may be occurring where there is "a leaking cover system due to cracks, fissures, or gaps around protruding wells."[13] In order to address this concern, EPA proposed two ways in which collection efficiency or emission estimates would be adjusted, both related to SEM. First, EPA proposed to amend Equations HH-6, HH-7, and HH-8 for regulated reporters (those that are subject to SEM requirements), by adding a "correction term." Equation HH-6 is used to calculate methane emissions using modeled methane generation and measured methane recovery, while equations HH-7 and HH-8 are used in tandem to calculate methane generation and emissions using methane recovery and estimated gas collection efficiency.[14] EPA noted that the three equations did not "directly account for periods where surface issues reduce the gas collection efficiency and/or reduce the fraction of methane oxidized."[15] To address that concern, EPA

[13] *Id.* at 32877–78. EPA also proposed other measures in the 2023 Supplemental Proposal to address a "poorly operating or non-operating gas collection system" and a "poorly operating or non-operating destruction device." NWRA commented on these proposed measures, which are not addressed in this petition.
[14] *See* 40 CFR 98.343(c)(3)(i).
[15] 2023 Supplemental Proposal, 88 Fed. Reg. 32878.

proposed a way to correct the estimated methane emissions based on monitored exceedances at the surface of the landfill. This proposed correction was based on conclusions from a study cited by EPA, *Heroux*, et al., and its internal citations, which suggested that methane "flux" (*i.e.*, the exchange of methane emissions and naturally occurring substances between Earth's surface and its atmosphere) is proportional to the measured methane concentration at six centimeters above the ground.[16] The proposed correction term would require Reporters subject to SEM to input the "leak duration days" (the number of days since the last monitoring event at the specified location) and the "surface methane concentration for the mth measurement that exceeds 500 parts per million above background."[17] The proposed correction term accounted for the fact that regulated landfills must record as a monitored exceedance, and take corrective action to address, any location with a reading of 500 ppm or more above background. EPA proposed to allow non-regulated landfills to elect to conduct SEM as well, so as to avail themselves of the use of the correction term when calculating their methane emissions using equations HH-6, HH-7, and HH-8.[18]

The second method by which EPA considered an adjustment of collection efficiency based on SEM was a proposed adjustment to the gas collection efficiency values in Table HH-3, as utilized in equations HH-7 and HH-8, applicable *only* to landfills that are not required to conduct SEM under other federal provisions or decline to elect to conduct SEM pursuant to proposed 40 CFR § 98.346(g)(7).[19] Specifically, EPA proposed to include a new set of gas

[16] *Id.*
[17] *Id.* at 32931. "Regulated" landfills are subject to such SEM requirements under the NSPS program, 40 CFR part 60, WWW or XXX; the EG program, subparts Cc or Cf; or Federal plans, 40 CFR part 62, subparts GGG or OOO. *Id.* at 32877–78.
[18] *See id.* at 32932 (proposing to implement elective surface-emissions monitoring for landfills with landfill gas collection systems that are not required to conduct such under an existing federal program under a new subsection, 40 CFR § 98.346(g)(7)).
[19] *Id.* at 32879.

collection efficiency values in Table HH-3, applicable to landfills that do not conduct SEM, that are "10 percent lower than the current set of collection efficiencies."[20] EPA proposed that the current set of collection efficiencies would be retained, and would "only be applicable for landfills that are conducting [SEM] according to the landfills rule requirements." [21] Since the vast majority of landfills conduct surface emission monitoring,[22] EPA's proposal would have lowered the collection efficiencies for *only* a relatively small subset of Reporters.

EPA's proposal rested on the conclusions of a study by the Environmental Integrity Project ("EIP Study")[23] that collection efficiencies of non-regulated landfills were 20% lower, on average, than regulated landfills. In discussing the EIP study conclusion relating to SEM, EPA stated: "These results make sense because the objective of the surface methane concentration measurements are to ensure proper gas collection and non-regulated landfills that do not conduct these measurements would not necessarily have such checks in place and may be expected to have higher emissions."[24] The EIP study results focused on a limited number of landfills in the state of Maryland that, when compared to the values reported under subpart HH, showed collection efficiencies that were 10% lower than regulated landfills under the GHGRP.

EPA specifically requested comment on: its proposal to lower collection efficiencies for landfills with gas collection systems that do not conduct SEM; the selection of a 10 percent collection efficiency reduction rather than the 20 percent reduction for those non-regulated landfills; and whether EPA should select an alternative value for non-regulated landfills based on

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[20] *Id.*
[21] *Id.*
[22] EPA-HQ-OAR-2019-0424-0256, Attachment A.
[23] EIP, *Greenhouse Gas Emissions from Maryland's Landfills* (2021), https://environmentalintegrity.org/wp-content/uploads/2021/06/MD-Landfill-Methane-Report-6.9.2021-unembargoed_with-Attachments.pdf).
[24] 2023 Supplemental Proposal, 88 Fed. Reg. at 32878.

the supporting data.[25] NWRA provided comment with respect to these proposed changes.[26] In addition to comments noting the technical and substantive inadequacy of the EIP Study, NWRA also noted that EPA's proposal and reliance on the EIP Study failed to account for other major factors that are more influential with respect to collection efficiencies at regulated and non-regulated landfills, including federal requirements to provide comprehensive controls, meet prescriptive timelines, and limit system downtime. NWRA also incorporated by reference the comments of Morton Barlaz, who likewise noted that EPA failed to identify all the factors that can affect collection efficiency, such as the type of cover and well density.[27] NWRA further noted that the equation HH-8 methodology accounts for these differences already, obviating the need for reduced collection efficiencies as proposed.

NWRA also provided comment on the proposed correction term, asking EPA to consider other studies that show significant variability in the correlation between surface emissions exceedances and methane flux. Specifically, we noted that the *Heroux*, et al. study EPA used to support the purported correlation was conducted over 20 years ago based on data from a single landfill in Canada.

Importantly, NWRA asked that EPA delay the finalization of any of the proposed revisions to subpart HH until the Solid Waste Industry for Climate Solutions ("SWICS") finalized its revisions to the third version of its white paper entitled *Current MSW Industry Position and State-of-the-Practice on LFG Collection Efficiency, Methane Oxidation, and Carbon Sequestration in Landfills*. The SWICS White Paper is a compilation of peer-reviewed data and studies relating to a broad range of MSW landfills, and it was undertaken for the

[25] *Id.* at 32879.
[26] *See* EPA-HQ-OAR-2019-0424-0255.
[27] NWRA incorporated by reference the comments of Morton Barlaz. *See* EPA-HQ-OAR-2019-0424-0286.

express purpose of creating a methodology that would result in more accurate inventories of methane from landfills. In relevant part, NWRA noted that the SWICS paper will "move toward a more quantified basis for GCCS collection efficiency assessment….and a revisit on the current state-of-the-practice on collection efficiencies, oxidation, carbon storage, methane generation in landfills and destruction efficiencies."[28]

B. <u>Final Rule</u>

In the Final Rule, EPA stated that, "[f]ollowing the consideration of comments received, we are not taking final action on the surface-emissions monitoring correction term that was proposed. *Instead*, we are finalizing the proposed lower collection efficiencies in table HH-3 to subpart HH but applying the reduced collection efficiencies for *all* reporters under subpart HH."[29] In making this decision, EPA conceded, consistent with NWRA's comments, that the *Heroux*, et al. study was insufficient, alone, to support the implementation of the correction term, because it was over two decades old and focused on one landfill in Canada.[30] Upon review of the additional studies identified by commenters, including those identified by NWRA, EPA agreed that there was indeed significant variability in measured surface concentrations and methane emissions flux across different landfills.[31] Due to "high uncertainty," EPA indicated that it is reassessing the appropriateness of a correction term and "evaluating other direct measurement technologies for assessing more accurate, landfill-specific gas collection efficiencies."[32]

With respect to the proposed collection efficiencies, EPA concluded that it "expected that the surface emissions correction factor would result in lower emissions than those calculated

[28] *See* EPA-HQ-OAR-2019-0424-0255.
[29] Final Rule, 89 Fed. Reg. at 31853 (emphasis added).
[30] *Id.* at 31855.
[31] Final Rule, 89 Fed. Reg. at 31855.
[32] *Id.*

using the 10-percentage point decrease in collection efficiency[.]"[33] Based on EPA's review of other studies correlating surface methane concentrations with methane flux," EPA stated its belief that a "more central tendency correlation factor is projected to yield emissions similar to a 10-percentage point decrease in collection efficiency."[34] EPA went on to state that "all the measurement study data" reviewed suggests that current collection efficiencies are overstated on average by 10-percentage points or more.[35] In making this point, EPA cited two studies that were not included in either the preamble or the docket for the Proposed Rules: *Duan et al.*, 2022 and *Nesser et al.*, 2023.[36] EPA asserted that the *Nesser* study, which observed 38 landfills subject to SEM requirements, provides evidence that most observed landfills had lower or similar measured collection efficiencies to those reported under subpart HH.[37] EPA further concluded that "[s]imilar low average collection efficiencies were noted by *Duan* et al.," and that those efficiencies justified its decision to finalize the lower default collection efficiencies for all landfills.[38]

III. Requested Reconsideration of the Collection Efficiency Values

Pursuant to Section 307(d)(7)(B) of the Clean Air Act, EPA "shall convene a proceeding for reconsideration of [a] rule and provide the same procedural rights as would have been afforded had this information been available at the time the rule was proposed" so long as the party seeking reconsideration can demonstrate: (1) "that it was impracticable to raise such

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[33] *Id.* at 31856.
[34] *Id.*
[35] *Id.*
[36] *Id.* (citing Duan, Z., et al., *Efficiency of gas collection systems at Danish landfills and implications for regulations*, 139 WASTE MANAGEMENT 269–78 (2022), https://doi.org/10.1016/j.wasman.2021.12.023.; Nesser, H., et al., *High-resolution U.S. methane emissions inferred from an inversion of 2019 TROPOMI satellite data: contributions from individual states, urban areas, and landfills*, EGUSPHERE [preprint] (2023), https://doi.org/10.5194/egusphere-2023-946; and supplement https://egusphere.copernicus.org/preprints/2023/egusphere-2023-946/egusphere-2023-946-supplement.pdf.
[37] Final Rule, 89 Fed. Reg. at 31856.
[38] *Id.* at 31856.

objection" during the public comment period or that "the grounds for such objection arose after the period for public comment (but within the time specified for judicial review)"; and (2) "such objection is of central relevance to the outcome of the rule." 42 U.S.C. § 7607(d)(7)(B).

The Petitioner could not practicably raise procedural and substantive objections to EPA's finalization of Table HH-3's reduced collection efficiencies by 10 percentage points, applicable to *all* Reporters under subpart HH, because EPA did not afford adequate notice of this change to interested parties prior to the public comment period. As such, the change to collection efficiency in HH-3 applicable to all Reporters under the Final Rule is not the "logical outgrowth" of the Proposed Rules. EPA is required to convene proceedings for reconsideration, so that interested parties may raise relevant substantive objections that are of central relevance to the outcome of the rule.

A. EPA did not afford interested parties with adequate notice of the lowered collection efficiencies applicable to all Reporters; therefore, the Final Rule is not the "logical outgrowth" of the Proposed Rules.

The practicability of raising an objection during the public comment period is dependent on EPA providing adequate notice of the changes it purports to finalize. The Clean Air Act incorporates the notice requirements set forth in the Administrative Procedure Act, by stipulating "[i]n the case of any federal rule to which this subsection applies, notice of a proposed rulemaking shall be published in the Federal Register, as provided under Section 553(b) of Title 5[.]" § 7607(b)(3). The APA's notice requirements are designed (1) to ensure that agency regulations are tested via exposure to diverse public comment, (2) to ensure fairness to affected parties, and (3) to give affected parties an opportunity to develop evidence in the record to support their objections to the rule and thereby enhance the quality of judicial review." *Int'l Union, United Mine Workers of America v. Mine Safety & Health Admin.*, 407 F.3d 1250, 1259

(D.C.Cir.2005). Notice, courts have recognized, must come from the agency's Notice of Proposed Rulemaking. *Chesapeake Climate Action Network v. EPA*, 952 F.3d 310, 320 (D.C. Cir. 2020). Because agencies "do not quite have the prerogative of obscurantism reserved to the legislatures," they must adhere to a "high standard of articulation" in expressing the "data [of] critical degree" in their Notices of Proposed Rulemakings. *United States v. Nova Scotia Food Prod. Corp.*, 568 F.2d 240, 252 (2d Cir. 1977). Notice, therefore, cannot be "bootstrap[ped]" from a comment received during the comment period after a Notice of Proposed Rulemaking has been published. *Fertilizer Inst. v. EPA*, 935 F.2d 1303, 1312 (D.C.Cir.1991). In this respect, if agencies "fail[] to disclose to interested persons the factual material upon which the agency was relying," the elements of fairness which are "essential to any kind of administrative action" are vitiated by preventing agencies from submitting comments of "cogent materiality." *Nova Scotia*, 568 F.2d at 249, 252.

Moreover, without adequate notice, it is widely recognized that a final rule does not equate to the "logical outgrowth" of the proposal. *See, e.g.*, *Envtl. Integrity Project v. EPA*, 425 F.3d 992, 996 (D.C. Cir. 2005); *Northeast Md. Waste Disposal Auth. v. EPA*, 358 F.3d 936, 951-52 (D.C. Cir. 2004); *Alon Ref. Krotz Springs, Inc. v. EPA*, 936 F.3d 628, 648 (D.C. Cir. 2019) (stating that the "impracticability prong" of Section 307(d)(7)(B) covers "instances when the final rule was not a logical outgrowth of the proposed rule"). A final rule is the "logical outgrowth" of a proposed rule only if interested parties "should have anticipated that the change was possible, and thus reasonably should have filed their comments on the subject during the notice-and-comment period." *Env't Integrity Project v. EPA*, 425 F.3d 992, 996 (D.C. Cir. 2005).

In contrast, agencies cannot justify changes implemented in a final rule by placing an "unreasonable burden on commentors not only to identify errors in a proposed rule but also to contemplate why every theoretical course of correction the agency might pursue would be inappropriate or incorrect." *Chesapeake Climate Action Network*, 952 F.3d at 320 (holding that a party's ability to comment on an *issue* generally does not in and of itself demonstrate sufficient notice from EPA). While an agency "need not subject every incremental change in its conclusions after each round of notice and comment to further public scrutiny before final action," *Sierra Club v. Costle*, 657 F.2d 298, 352 (D.C. Cir. 2981), interested parties must be able to anticipate that the change was possible, and could have submitted comments relating to such. *Northeast Md. Waste Disposal Auth.*, 358 F.3d at 952 (finding that a final rule which collapses the proposed rule's three categories into two is the logical outgrowth of the proposed rule); *Envt'l Integrity Project*, 425 F.3d at 996 ("The Court will refuse to all agencies to use the rulemaking process to pull a surprise switcheroo on the regulated entities.").

Here, the Petitioner did not have adequate notice of EPA's decision to impose lower collection efficiencies upon *all* Reporters. Rather, the Petitioner had notice that EPA was considering an adjustment to collection efficiencies and emission calculations tied to SEM practices; EPA indicated that it may lower collection efficiencies by 10% for those MSW landfills not conducting SEM and by a correction term for those that do conduct SEM and for which surface emissions were detected above defined thresholds. EPA did not indicate anywhere in the Proposed Rules that it was considering an across the board lowering of collection efficiencies regardless of SEM practices and results. Indeed, the very basis for EPA's proposal in the first instance was a concern about accurately accounting for "methane emissions from large release events that are currently not quantified under the GHGRP" including those that may result from "emissions from leaking cover systems due to cracks, fissures, or gaps around protruding wells"[39]—issues that would be detectable by SEM. EPA's decision in the Final Rule had nothing to do with SEM at all—in fact, as discussed above, EPA pivoted away from SEM and in its place adopted an across-the-board reduction in collection efficiencies based in large part on newly identified data.

While it is true that EPA is not obligated, and cannot be reasonably expected, to subject "every incremental change in its conclusions" to additional rounds of notice and comment before final action, this change is not incremental. *See Sierra Club*, 657 F.2d at 352. The Petitioner could not and did not anticipate EPA's final action, especially given that EPA requested comment regarding: (1) the "new set of proposed collection efficiencies for landfills with gas collection systems that do not conduct surface methane concentration measurements"; (2) EPAs "selection of 10 percent lower collection efficiencies for landfills that are not monitored for surface methane rather than selecting a 20 percent lower value as suggested by the commenters that referenced the [EIP Study] data" [40]; and (3) supporting data on whether EPA should select an "alternative collection efficiency value than the proposed 10 percent difference or the 20 percent difference[.]"[41] Based on these requests for comment, the Petitioner reasonably expected EPA to: finalize the collection efficiencies as proposed for non-regulated Reporters; lower the values applicable to non-regulated Reporters in accordance with the percentages identified in the EIP Study; retain the status quo; or, if commenters pointed to scientific data that supported some "alternative" value for non-regulated landfills, subject interested parties to another round and notice and comment on a different proposed value based on the new scientific data. *See United*

[39] 2023 Supplemental Proposal, 88 Fed. Reg. at 32877–78.
[40] *Id.* at 32878; EIP, *Greenhouse Gas Emissions from Maryland's Landfills* (2021), https://environmentalintegrity.org/wp-content/uploads/2021/06/MD-Landfill-Methane-Report-6.9.2021-unembargoed_with-Attachments.pdf).
[41] 2023 Supplemental Proposal, 88 Fed. Reg. at 32879.

States v. Nova Scotia Food Prod. Corp., 568 F.2d 240, 252 (2d Cir. 1977). In no event did EPA suggest that it was evaluating a collection efficiency reduction for all Reporters as a standalone measure, uncoupled from SEM as a factor on which that value should be based.

NWRA submitted comments in accordance with EPA's requests, in part because we disagree that SEM is a strong indicator of overall collection efficiency, especially as extrapolated to a quantification of annualized emissions. Further, NWRA disagreed with the technical information proffered by EPA to support its proposal. Specifically, the Petitioner's comments questioned the adequacy of the EIP Study on the basis that it was not properly peer-reviewed in accordance with EPA's General Assessment Factors[42] and Peer Review Policy.[43] NWRA also commented that the EIP Study, which focused on 14 landfills in Maryland only, was not representative of MSW landfills subject to subpart HH across the entire United States. In addition, NWRA pointed out that the equation HH-8 methodology, as-is, adequately accounts for the factors which legitimately and substantially influence the difference in collection efficiencies between landfills conducting SEM and landfills not conducting SEM. Accordingly, NWRA asked that EPA either maintain the status quo or await publication of comprehensive, representative data in the updated version of the SWICS White Paper, a document that EPA has relied upon in the past. NWRA's comments were also substantially influenced by the proposed "correction term," which EPA proposed in tandem with the lowered collection efficiencies. Though we objected to lowering collection efficiencies at all, we at least recognized that, coupled with the correction term, there existed an incentive for non-regulated landfills to conduct

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[42] Summary of General Assessment Factors for Evaluating the Quality of Scientific and Technical Information (June 2003) (available at https://www.epa.gov/sites/default/files/2015-01/documents/assess2.pdf).
[43] Peer Review Handbook (4th Edition 2015) (available at https://www.epa.gov/sites/default/files/2020-08/documents/epa_peer_review_handbook_4th_edition.pdf).

SEM, consistent with the original goals articulated by Congress in directing EPA to establish the GHGRP.[44]

If the Petitioner had been on notice of the remote possibility that EPA would finalize lower collection efficiencies applicable to *all* Reporters, without regard to SEM, the Petitioner certainly would have submitted corresponding comments, outlining the broad range of scientific reasons why EPA should not do so. But since EPA failed to provide such notice, EPA's finalized collection efficiencies cannot permissibly be considered the "logical outgrowth" of its original proposal.

The situation here is unlike other cases in which the D.C. Circuit has found that the final rule was a "logical outgrowth" of a proposed rule. For example, in *Northeast Maryland Waste Disposal Authority v. EPA*, the Circuit Court held that a final rule which collapses the proposed rule's three categories into two *is* the logical outgrowth of the proposed rule. 358 F.3d 936, 953 (D.C. Cir. 2004). Rather, EPA's action here is akin to situations where the Circuit has found a lack of logical outgrowth. In *International Union*, for example, the agency's proposed rule provided that "[a] minimum air velocity of 300 feet per minute must be maintained" to ventilate underground coal mines.[45] The final rule, however, provided that "[t]he maximum air velocity in the belt entry must be no greater than 500 feet per minute, unless otherwise approved in the mine ventilation plan."[46] The D.C. Circuit vacated the final rule because, although "[t]here were some comments during the hearings urging the Secretary to set a maximum velocity cap," the Agency "did not afford a ... public notice of its intent to adopt, much less an opportunity to comment on, such a cap." *International Union*, 407 F.3d at 1261. Like the concept of air velocity in

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[44] 121 Stat. 1844, Pub. L. 110-116 (Dec. 26, 2007).
[45] 68 Fed. Reg. 3936, 3965 (Jan. 27, 2003).
[46] 69 Fed. Reg. 17,480, 17,526 (Apr. 2, 2004).

International Union, the general concept of collection efficiency may have been raised in the 2023 Supplement, but the Final Rule's across the board decrease in collection efficiencies for all landfills is not consistent with the Proposed Rules, nor was it foreseeable from the Proposed Rules. EPA's final action here "finds no roots in the agency's proposal," *Kooritzky v. Reich*, 17 F.3d 1509, 1513 (D.C. Cir. 1994), equating to an impermissible "surprise switcheroo." *Envt'l Integrity Project v. EPA*, 425 F.3d 992, 996 (D.C. Cir. 2005).

EPA has attempted to support its collection efficiency "switcheroo" by citing two new scientific studies that allegedly support the lowering of collection efficiencies as applicable to *all* Reporters, without regard to SEM. Specifically, EPA states that "[a]ll the measurement study data [] reviewed suggests that current GHGRP collection efficiencies are overstated on average by 10-percentage points or more," citing to *Duan et al.*, 2022[47] and *Nesser et al.*, 2023.[48] As explained below, neither these studies nor the EIP Study support EPA's final decision.

Further, from a notice standpoint, EPA did not cite to either the *Duan* or *Nesser* studies in the Proposed Rules. The *Nesser* study was advanced by the paper's co-author, Hannah Nesser, in her comment in response to EPA's 2023 Supplement.[49] The paper itself was published online on June 13, 2023, only a few weeks before the close of the public comment period on July 22, 2023. The information contained therein was not even publicly available so as to inform EPA's proposals advanced on May 22, 2023, in the 2023 Supplement. In relying on entirely new data within the *Nesser* paper, EPA attempts to impermissibly "bootstrap" notice from a comment. *See*

[47] Duan, Z., et al., *Efficiency of gas collection systems at Danish landfills and implications for regulations*. 139 WASTE MANAGEMENT 269–78 (2022), https://doi.org/10.1016/j.wasman.2021.12.023.
[48] Nesser, H., et al., *High-resolution U.S. methane emissions inferred from an inversion of 2019 TROPOMI satellite data: contributions from individual states, urban areas, and landfills*. EGUSPHERE [preprint] (2023), https://doi.org/10.5194/egusphere-2023-946.
[49] EPA-HQ-OAR-2019-0424-0306. The paper was published online on June 13, 2023, only a few weeks before the close of the public comment period on July 22, 2023.

Fertilizer Inst. V. EPA, 935 F.2d 1303, 1312 (D.C.Cir.1991). EPA cannot reasonably assert that the final collection efficiencies are the "logical outgrowth" of the 2023 Supplement by relying on a study introduced via comment, without providing other interested parties the opportunity to review and comment on the study as well, for the purpose for which it is offered. *See, e.g.*, *United States v. Nova Scotia Food Prod. Corp.*, 568 F.2d 240, 251 (2d Cir. 1977).

Even more unacceptable is EPA's reliance on the *Duan* study. EPA did not cite or refer to *Duan* in either proposed rule; nor was it cited by an interested party during the public comment process. EPA's sudden reliance on *Duan* appears to be a post-hoc rationalization for its Final Rule, rather than appropriately identified support for a proposal that was properly noticed. Indeed, in this rulemaking, EPA has expressly acknowledged that newly cited studies introduced during the comment period warrant the agency's further consideration. As described *supra*, EPA proposed to implement a "correction term" to equations HH-7 and HH-8 that it hoped would more accurately quantify emissions by "account[ing] for periods where surface issues reduce the gas collection efficiency and/or reduce the fraction of methane oxidized."[50] In NWRA's comments on the proposal, we objected to the addition of the correction term on the basis that EPA's cited sources, namely *Heroux, et al.* and its internal sources, do not "adequately capture the complexity of the attempted correlation between surface emission exceedances and methane flux."[51] We asked that EPA consider other studies which show significant variability in the alleged correlation. In response, EPA stated that it would "continue to review additional information on existing and advanced methodologies and new literature studies and consider ways to effectively incorporate these methods and data in future revisions under subpart HH[.]"[52]

[50] 2023 Supplemental Proposal, 88 Fed. Reg. at 32878.
[51] EPA-HQ-OAR-2019-0424-0319.
[52] Final Rule, 89 Fed. Reg. at 31855.

EPA also indicated that it would take time to further consider the implementation of a correction term in light of newly advanced data, without taking any action in the Final Rule.[53] Consistent with its response to comments on the correction term, EPA should have acknowledged that more study of collection efficiency values is needed and should have subjected the 10-percent across-the board reduction collection efficiencies to an additional round of notice-and comment. *See, e.g.*, *Mexichem Specialty Resins, Inc. v. EPA*, 787 F.3d 544, 554 (D.C. Cir. 2015) (EPA may determine that affording a party seeking reconsideration the "same procedural rights" requires the initiation of rulemaking to gather additional data" to inform its decision).

B. <u>The finalized collection efficiencies should be reconsidered because the Petitioner's objections are of "central relevance to the outcome of the rule."</u>

An objection is of central relevance if it "provides substantial support for the argument that the regulation should be revised." *Coal. For Responsible Regulation v. EPA*, 684 F.3d 102, 125 (D.C. Cir. 2012); *Kennecott Corp. v. EPA*, 684 F.2d 1007, 1019 (D.C. Cir. 1982) ("Because the reasonableness and accuracy of the forecast data is critical to whether a smelter can qualify for [a nonferrous smelter order], Asarco and Magma's objections to that data, if well-founded, would clearly have been "'of central relevance.'").

The finalized collection efficiencies should be reevaluated and revised because they were central to the proposed and Final Rules. Indeed, emissions calculations are the crux of the GHGRP. EPA has articulated its over-arching goal to increase the accuracy of emissions calculations, so that Reporters, and more broadly the public at large, can understand whether and to what extent an entity is contributing to greenhouse gas emissions.[54] Universal required

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[53] *Id.*

[54] Final Rule, 89 Fed. Reg. at 31884 ("[T]ransparent, standardized public data on emissions allows for accountability of polluters to the public who bear the cost of the pollution. The GHGRP serves as a powerful data resource and provides a critical tool for communities to identify nearby sources of GHGs and provide information to state and local governments.").

changes in calculation methodologies, therefore, should be considered carefully by EPA, especially where it has added a new methodology that overestimates emissions across the reporting sector. At a minimum, the "central relevance" requirement for reconsideration is satisfied in circumstances such as this, where there are well-founded objections pertaining to "critical" portions of the rule. *See Kennecott*, 684 F.2d at 1019.

Indeed, EPA's finalization of understated collection efficiencies, and the lack of support thereof, undermine the very purpose and objective of the GHGRP—to promote the accurate and comprehensive collection and reporting of greenhouse gas emission data. These failures will, in turn, harm the Petitioner's members. The finalized collection efficiencies will result in discrepancies among state and federal programs that require methane emissions reporting. With respect to federal programs, EPA has used GHGRP data on MSW landfills to "inform the development of the 2016 NSPS and EG for landfills."[55] Similarly, the "benefits of improved reporting also include enhancing existing voluntary programs, such as the Landfill Methane Outreach Program (LMOP)."[56] Moreover, EPA recognizes that "[s]everal states use GHGRP data to inform their own policymaking."[57] GHGRP emission estimates will also be at odds with EPA's own emissions factors in AP-42, as well as state permitting programs, which allow for a range of collection efficiencies and the recognition that higher collection efficiencies may be achieved at some sites that are designed and engineered to collect and control landfill gas.[58]

[55] *Id.*
[56] *Id.*
[57] *Id.*
[58] *See* AP-42, at 2.4-6, https://www3.epa.gov/ttnchie1/ap42/ch02/final/c02s04.pdf

> "To estimate controlled emissions of CH4, NMOC, and other constituents in landfill gas, the collection efficiency of the system must first be estimated. Reported collection efficiencies typically range from 60 to 85 percent, with an average of 75 percent most commonly assumed. Higher collection efficiencies may be achieved at some sites (i.e., those engineered to control gas emissions). If site-specific collection efficiencies are available (i.e., through a comprehensive surface sampling program), then they should be used instead of the 75 percent average."

Without accuracy and consistency across these programs, Reporters and agencies will not be able to appropriately identify and address emissions-related issues at affected facilities.

To the extent that GHGRP reported emissions are overestimated compared to reported emissions under other programs, such discrepancies will also add complexity to sustainability reporting and permitting, negatively impacting and complicating information provided to shareholders and third parties, and subjecting Reporters to risk. As a practical matter, the lowered collection efficiencies will have a compounding effect across multi-facility companies and may act as a disincentive to increase gas collection given that EPA's final rule now assumes inefficiencies among Reporters using HH-8. This is because HH-8, in general, assumes that emissions are directly proportional to the amount of landfill gas that is recovered and destroyed. Thus, the lowered collection efficiencies in the new rule could disincentivize higher actual collection.

Moreover, absent reconsideration, the final rule may have broad unintended consequences on policies designed to reduce greenhouse gas emissions. EPA's Renewable Fuel Standard ("RFS") program, for example, requires gasoline and diesel producers to incorporate renewable fuels into the Nation's transportation fuel supply.[59] Congress sought to accomplish this mandate in large part by encouraging the increased production and use of cellulosic biofuels—including renewable natural gas derived from landfill biogas—with the goal of achieving lower costs for consumers, reduced GHG emissions, better air quality, and greater energy independence.[60] Other policies have built upon the success of the RFS program, offering

[59] *See* 40 C.F.R. § 80, subpart M.
[60] *Renewable Fuel Standard (RFS) Program: Standards for 2023–2025 and Other Changes*, 88 Fed. Reg. 44468, 44471 (July 12, 2023).

additional incentives for landfill methane capture, which waste sector stakeholders rely on in making business decisions around the installation of bio gas processing equipment.

States such as California, Oregon, Washington, and New Mexico have also developed Clean Fuel Standard programs[61] to encourage the use of low-carbon transportation fuels by providing credit to renewable fuel producers on a sliding scale based on the carbon intensity of each fuel. Unfortunately, the finalized collection efficiencies will have a negative impact on the carbon intensity scores of fuels sourced from landfill-derived biogas, resulting in reduced financial incentives for the production of renewable natural gas and potentially disincentivizing projects aimed at capturing methane emissions from waste sector operations. Congress has similarly incentivized the implementation of clean energy projects under the Inflation Reduction Act of 2022 ("IRA")[62], making tax credits available to taxpayers using a "technology-neutral" approach. The IRA specifically included a suite of tax credits designed to reward renewable fuel producers for lowering the carbon intensity scores of their fuels.[63] Similar to the negative impacts of the final rule associated with the aforementioned Clean Fuel Standard programs, EPA's finalized collection efficiencies will reduce the value of various tax credits for the production or generation of renewable natural gas, clean hydrogen, renewable electricity, and sustainable aviation fuel—potentially resulting in lost opportunities to capture landfill methane for beneficial use. Finally, to the extent that future legislative actions would contemplate a "carbon tax" or similar financially based implications for greenhouse gas emissions, it is

[61] Cal. Code Regs. tit. 17, § 95480; Or. Admin. R. 340-253-0000; Wash. Rev. Code Ann. § 70A.535.005; New Mexico House Bill 41 (requiring the Environmental Improvement Board to promulgate regulations to initiate the program no later than July 1, 2026).
[62] 136 Stat. 1818, Pub. L. 117–169 (Aug. 16, 2022).
[63] *See* 26 U.S.C. § 6426.

imperative that the quantification of such emissions is reliable and accurate. EPA should set a high standard under the GHGRP for such accuracy.

C. **EPA lacks adequate technical justification for the finalized reduction in collection efficiencies.**

As finalized, the lowered collection efficiencies are technically unjustified, and the proffered bases do not support EPA's change in position.

An agency action is arbitrary and capricious if there does not exist a "rational connection between the facts found and the choices made." *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983). A rational connection between the facts found and the choices made does not exist if, among other reasons, the agency failed to consider an important aspect of the problem or the agency offers an explanation for its decision that runs counter to the evidence. *Id.* Both shortcomings are present here. In the 2023 Supplement, EPA purported to address "methane emissions from large release events" and focused on whether landfills were using SEM to address "leaking cover systems due to cracks, fissures or gaps around protruding wells" as a basis on which to adjust collection efficiency.[64] But in the Final Rule, EPA dismissed SEM as a consideration and relied only on study papers, including two that were newly cited, to support an across the board reduction in collection efficiencies, rather than focusing on methane emissions from large release events as it did in the 2023 Supplemental Proposal. In so doing, EPA prevented comment that would have addressed overall collection efficiencies across the MSW landfill sector rather than emissions associated with large release events, including those that occur via cover problems that are addressed by SEM. Such material comments would have advanced arguments falling within the "relevant factors" that EPA is

[64] 2023 Supplemental Proposal, 88 Fed. Reg. at 32877–78.

required to consider before finalizing a regulation. Without consideration of such important input, EPA ignored "important aspects of the problem" relating to landfill collection efficiency and greenhouse gas emissions. *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983). While reviewing courts are generally deferential with respect to decisions involving agency expertise, *Logic Tech. Dev. LLC v. FDA*, 84 F.4th 537, 549 (3d Cir. 2023); *GenOn REMA, LLC v. EPA*, 722 F.3d 513, 526 (3d Cir. 2013), agencies are forbidden from reaching "whatever conclusions [they] like" and defending such positions "with vague allusions to [their] own expertise." *Sierra Club v. EPA*, 972 F.3d 290 (3d Cir. 2020) ("Although EPA has offered vague allusions to the inability of unspecified plants to meet a lower standard, the agency has deprived us of the ability to review its decision by showing its work."). Put simply, an agency action must be "reasonable and reasonably explained." *FCC v. Prometheus Radio Project*, 592 U.S. 414 (2021). This was not.

In the Final Rule, EPA acted arbitrarily by relying on scientific data that was not presented in either of the Proposed Rules. Just as importantly, EPA also failed to adequately explain how the scientific conclusions of the studies on which it relied—which involved the use of remote sensing data to quantify landfill emissions—support the final collection efficiencies without regard to SEM. In fact, in the Final Rule EPA underscored the dangers of relying on such technologies at this juncture. There, EPA stated that it was "not taking final action at this time regarding the incorporation of other direct measurement technologies" such as satellite imaging, aerial measurements, vehicle mounted measurement or continuous sensor networks because "most top-down facility measurements are taken over limited durations (a few minutes to a few hours) typically during the daylight hours when specific meteorological conditions exist (*e.g.*, no cloud cover for satellites; specific atmospheric and wind speed ranges for aerial measurements)."[65] EPA further recognized that these methods of measurement "may not be representative of the annual CH_4 emissions from a facility, given that many emissions are episodic."[66] Consequently, EPA concluded, "[e]xtrapolating from limited measurements to an entire year therefore creates risk of either over or under counting actual emissions."[67] In this respect, EPA's decision to heavily rely upon *Nesser* and similar studies, whose findings are the result of satellite imaging, in supporting a broad-based and unqualified reduction in collection efficiency values, is puzzling. EPA makes no effort to explain this discrepancy in logic, which has resulted in a Final Rule that runs counter to the agency's own findings.[68]

1. <u>**The Nesser Study does not support EPA's collection efficiency determination.**</u>

EPA cites the *Nesser* study for the general proposition that "recent aerial studies indicate methane emissions from landfills may be considerably higher than bottom-up emissions reported under subpart HH for *some* landfills" and further notes that such higher emissions may be attributable to "poorly operating gas collection systems or destruction devices and leaking cover systems."[69] But EPA fails entirely to explain how the *Nesser* study, which was based on its review of only 38 landfills, supports a broad-based collection efficiency reduction applicable to

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[65] Final Rule, 89 Fed. Reg. at 31856.
[66] *Id.*
[67] *Id.*
[68] This petition focuses on the introduction of scientific data from Nesser, et al., 2023 and Duan et al., 2022. EPA also referenced two additional studies: Oonk, H., *Efficiency of landfill gas collection for methane emissions reduction*, 2 GREENHOUSE GAS MEASUREMENT AND MANAGEMENT, 129–145 (2012) https://doi.org/10.1080/20430779.2012.730798; and Arcadis, *Quantifying Methane Abatement Efficiency at Three Municipal Solid Waste Landfills; Final Report*. Prepared for U.S. EPA, Office of Research and Development, Research Triangle Park, NC. EPA Report No. EPA/600/R–12/ 003. (Jan. 2012). https://nepis.epa.gov/Exe/ZyPDF.cgi/P100DGTB.PDF?Dockey=P100DGTB.PDF.
It is unclear whether EPA relies on these studies to support its assertion that historical collection efficiencies are overstated, because EPA fails to adequately explain the relevance of these studies and how they support the finalization of the lowered collection efficiencies. Final Rule, 89 Fed. Reg. at 31856.
[69] Final Rule, 89 Fed. Reg. at 31854 (emphasis added).

the more than 1,000 landfills[70] that are subject to reporting under the GHGRP.[71] Just as critically, EPA does not explain the basis on which such collection efficiencies can be appropriately or accurately measured with satellite imagery—a key concern for the Petitioner.

The *Nesser* study uses 2019 satellite (TROPOMI) data at approximately 25 x 25 km resolution to estimate methane emissions for grid cells in the contiguous United States with 2012 reported methane emissions larger than 0.1 Mg /(km year).[72] *Nesser* alleges that landfill emissions are 51% higher than the Greenhouse Gas Inventory ("GHGI") indicates.[73] The study compared optimized emissions for 73 individual landfills to those reported under the GHGRP and alleges to have found a median 77% increase in emissions relative to reported values.[74] Of the 73 studied landfills, 38 of the facilities recovered gas and reported an average efficiency of 0.5 (0.33 – 0.54) compared to the reported average of 0.61.[75] However, the collection efficiency reported in the 2019 GHGI was either within or higher than the author's reported uncertainty range for 15 of the 38 landfills.[76] Moreover, the study found no correlation (R2 = 0.00) between GHGRP emissions and the landfill estimates. The correlation did not improve when considering only facilities that do or do not capture landfill gas.[77] In summary, NWRA believes that the *Nesser* study introduces several uncertainties, which, taken separately or collectively, undermine its use as a basis for EPA's action:

- The range reported is not a credible (confidence) interval for the estimated emissions but is the range of the eight members of the ensemble. This range only accounts for

[70] EPA-HQ-OAR-2019-0424-0256, Attachment A.
[71] Final Rule, 89 Fed. Reg. at 31856.
[72] *Nesser*, *et al.*, at 2, 4.
[73] *Id.* at 26.
[74] *Id.*
[75] *Id.* at 19.
[76] *Id.*
[77] *Id.*

the uncertainty introduced by the optimized boundary conditions, bias correction, and regularization factor, and does not account for the uncertainty in the measurements, transport model or and source attribution methods.

- Emission sources not included in the 2012 GHGI are not accounted for. The source aggregation approach assumes that the 2012 reported fractional sectoral contributions are correct in each 25 x 25 km grid cell.
- The study only quantified 70 of the 1297 landfills that reported to the GHGRP in 2019.
- Satellite data can only be collected during clear daytime conditions, so landfills in areas with snow or high cloud cover were less likely to be quantified. With a low (3%) success rate, TROPOMI data may be as few as 12 measurements over the course of a year for a given site, biased toward clear summertime conditions.
- The study does not discuss whether readings occurred during landfill operating hours.
- It is our understanding that TROPOMI is an open-source satellite in geosynchronous orbit, meaning that measurements are taken at the same time each day, thus failing to account for key differences in nighttime values. EPA's own work discusses that 99% of landfills have more negative temporal pressure during days compared to the rest of the time leading to overestimating methane emission. While not published, EPA should be aware of work done within its own agency regarding this topic.

Indeed, even the authors acknowledge the risks inherent in relying on such data: "[o]ur landfill attribution approach, which relies on a prior estimate from 2012, may therefore misallocate emissions to the Puente Hills Landfill instead of to co-located oil and gas operations".[78] Further, the study goes on to say, "[c]ompared to TROPOMI, both the prior and posterior GEOS- Chem simulations produce similar coefficients of determination (R2) and root-mean-square errors (RMSEs)," indicating that using the authors' estimated emission rates fail to explain any additional variability in the satellite measurement compared with the 2012 reported values.[79]

By not accounting for all the sources of uncertainty in the model and measurements in the reported uncertainty range, the authors have failed to demonstrate that the difference between the observed and reported collection efficiencies is statistically significant. The variation in observed collection efficiencies and significant sources of uncertainty in the observations do not provide sufficient justification for a 10% reduction in collection efficiency across the board.

2. The Duan Study does not support EPA's collection efficiency determination.

EPA similarly fails to explain how the conclusions of the *Duan, et al.*, 2022 study support its decision to lower collection efficiencies and uncouple collection efficiency from SEM. In fact, the conclusions set forth in the *Duan* study more closely *support* EPA's 2023 Supplement proposal to tie collection efficiency to SEM.

The *Duan* study observed 23 Danish landfills using a tracer gas dispersion method.[80] Gas collection efficiencies were calculated by taking the collected methane gas and dividing it by the sum of collected methane, methane emitted into the atmosphere, methane oxidized in cover soil, methane migrated laterally, and methane stored in the landfill body.[81] As a result, the study concluded that Danish landfills, on average, have lower collection efficiencies than other

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[78] *Id.*
[79] *Id.* at 13.
[80] Duan, Z., et al., *Efficiency of gas collection systems at Danish landfills and implications for regulations*, 139 WASTE MANAGEMENT 270 (2022), https://doi.org/10.1016/j.wasman.2021.12.023.
[81] *Id.*

countries, and suggested that such was the result of shallow wells, lack of gas collection in some areas, and low recovery due to minimal production.[82] The study based its conclusions on "whole-site methane," even when collection systems did not cover the site. Sites that had discontinuous GCCS operations had high collection efficiencies (94-95%) when the system ran, but lower collection efficiencies when the GCCS was turned off, leading to lower average collection efficiencies.[83]

Notably, the *Duan* study acknowledged the complexity associated with quantifying gas production, emissions, and collection efficiency.[84] The study stated, "[a]t landfills with well-designed liner and cover systems and aggressive gas collection approaches, efficiency can be as high as above 90%, as observed in previous studies (e.g. UK-J and Redwood landfills) based on whole-site emissions measurements."[85] Further, the study noted "[i]f gas collection has not been established in every cell at a landfill—for example, if no gas collection occurs at active cells—using average efficiency will underestimate the actual gas collection efficiency in closed cells."[86] Based upon the complexity of calculation and landfill-dependent factors, the study actually suggests coupling collection efficiency with SEM.[87] This acknowledgment better comports with EPA's proposal in the 2023 Supplement, rather than what was finalized in the Final Rule. In sum, the *Duan* study agrees that a one-size-fits-all approach is inappropriate when it comes to landfill collection efficiency—an implication that is directly at odds with EPA's decision to

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[82] *Id.* at 277.
[83] *Id.* at 274.
[84] *Id.* at 275 ("Landfill gas production and emissions are determined by many factors, such as waste composition, waste age, disposed waste amount, landfill design and operation, lack meteorological conditions, etc."); *see also id.* at 276 ("Gas collection efficiency depends on the phase of the landfills, design, and management of the LFG collection system, the presence or type of top cover, etc.").
[85] *Id.* at 270.
[86] *Id.* at 276.
[87] *Id.* Specifically, it states that "surface methane concentration screening could be conducted to identify significant release points or areas, following which any identified major leaks should be repaired."

lower default collection efficiencies across the board. With little more than a few sentences supporting EPA's use of this study in the Final Rule, EPA has failed to establish a rational connection between *Duan* and lowered default collection efficiency values irrespective of SEM.

Further diminishing any justification for reliance on the *Duan* study is the fact that it pertains to Danish landfills that are not representative of landfills across the United States. EPA has agreed with NWRA's contention that the data the agency used to support the proposed correction term—which rested on an analysis conducted using a dynamic flux chamber covering a surface area of 0.2 m^2 over 20 years ago at one landfill in Canada—could not adequately support the proposal.[88] Similarly, here, EPA should not rely on a study evaluating Danish landfills, especially where the authors state that there are stark differences between U.S. and Danish landfills. Specifically, the study states that the "measured emissions normalized to the disposed waste mass and areas of the landfills in Denmark are *significantly* lower than" normalized emissions of U.S. landfills, which may be the result of Denmark's 1997 ban on landfilling organic waste.[89] Consequently, relying on the *Duan* study is unacceptable, especially in light of EPA's outward refusal to rely on studies not found to be "nationally representative" of MSW landfills.[90]

3. **<u>The EIP and Duren Studies do not support EPA's collection efficiency determination.</u>**

Although EPA cites to both the EIP Study and the *Duren et al.*, 2019[91] study in the 2023 Supplement, EPA fails to adequately explain how either of these studies support its decision to

[88] Final Rule, 89 Fed. Reg. at 31855.
[89] *Duan et al.*, at 276.
[90] Data Quality Improvements Proposal, 87 Fed. Reg. at 37009.
[91] Duren et al., *California's Super Emitters*. 575 NATURE 180¬84. 7 (2019), https://doi.org/10.1038/s41586-019-1720-3.

lower collection efficiencies by 10% across all categories of affected landfills. As such, EPA's decision, which relies on these papers, is not supported.

EIP's findings rest on their discovery of a math error in the State of Maryland's methane emissions calculation for landfills. The study pointed out that the Maryland Department of the Environment calculated emissions as 10% of uncollected gases and 90% oxidized instead of 90% uncollected and 10% oxidized. From there, the study discussed how few landfills have gas collection and control systems—21 out of 40—with only four subject to federal requirements under the New Source Performance Standards program. EIP ultimately suggests two solutions: (1) more widespread implementation of gas collection systems, and (2) organics diversion. It compares collection efficiencies of facilities with gas collection and control systems that are subject to NSPS (76% collection efficiency) and those that voluntarily install such systems (55% collection efficiency): "EPA estimates that the average collection system harnesses 75% of the gas generated in the waste heap." However, EIP then notes that Maryland landfills have system collection efficiencies that range from 5-95%, with an average of 59%.

As stated in NWRA's comments to the 2023 Supplement, Maryland landfills are not representative of landfills across the United States and represent a low number of federally regulated landfills. Therefore, the data from this study should not be extrapolated to other landfills in the U.S. for comparing subpart HH collection efficiencies and LandGEM modeling-based collection efficiency. EPA exacerbated this misplaced reliance by failing to consider key variables in its analysis, including differences in waste disposal streams (and associated differences in potential methane generation capacity), calculation methodologies for collection efficiencies based on reported collection volumes, and the significance of federal expansion timelines and downtime limitations over the performance of SEM.

In addition, EPA failed to articulate a rational explanation with respect to how the study's conclusions support the across-the-board reductions in collection efficiencies seen in the Final Rule, and failed to address the concerns raised by NWRA in its comments. Ultimately, EPA went from using the EIP Study to support reduced collection efficiencies for facilities not conducting SEM, to reducing collection efficiencies for all Reporters regardless of SEM. Interestingly, EPA could not cite this study, or any other for that matter, to "support further reductions in gas collection efficiencies for voluntary gas collection systems."[92] Even in light of EPA's scientific and technical expertise, the use of the EIP Study to support the finalized changes is not "reasonable [or] reasonably explained." *FCC v. Prometheus Radio Project*, 592 U.S. 414 (2021).

To the extent that EPA's finalized collection efficiencies were promulgated using conclusions from *Duren et al.*, 2019, such reliance is likewise misguided. The *Duren* study conducted five campaigns between 2016 through 2018 to survey more than 272,000 "infrastructure elements" in California using an airborne imaging spectrometer that the authors alleged "can rapidly map methane plumes."[93] However, the *Duren* study conceded "[t]he fact that we did not detect a larger population of smaller methane point sources across the landfill sector suggests that most of those facilities emit methane as area sources that cannot be detected with this method."[94] EPA similarly acknowledged this shortcoming in its Technical Support Memo:

> *It is important to note that only landfills with anomalous emissions could be quantified by the aerial methods used by Duren, et. al., (2019) and that these emissions only occurred at 7 percent of the surveyed landfills. However, when these anomalous emissions occur, the CH4 emissions reported to the EPA under Subpart HH are consistently lower than the measured emission rates extrapolated to annual*

[92] Final Rule, 89 Fed. Reg. at 31856.
[93] *Duren, et al.*, at 180.
[94] *Id.* at 182.

estimates……… Because the California aerial study of Duren, et. al., (2019) could not quantify the emissions from 93% of the landfills that did not have anomalous emissions, this study does not provide evidence that the Subpart HH methodologies are inaccurate or unbiased under typical conditions that exist for most landfills.[95]

The *Duren* study also failed to discuss diurnal issues or times of flights (*e.g.*, whether flights were conducted during the daylight hours), and it relied on a "persistence" factor that is inappropriate for multiple reasons. In this original publication, *Duren* gave landfills a blanket "100%" persistence factor, meaning that it extrapolated estimated emissions results to the entire year, which EPA has recognized as inappropriate.[96] Moreover, use of this persistence factor is inappropriate because the authors filtered their runs to weed out flights where they didn't get a detection, or the detection was unreliable for various QA/QC reasons.

Further, the *Duren* study never addresses whether the same plume may have been detected on multiple flyovers. This information is important, because it could either exaggerate or undermine the 100% persistence concept that is fundamental to emission quantification based on such remote observations. For example, different plumes would have different calculated emissions, with no one plume being appropriate for extrapolation. Further, the reality of variable emissions points reflect the variable nature of emissions over time. Assuming continuous emissions could easily overlook low- or even no-emissions days, in direct conflict with the notion of "100% persistence."

As another example, *Duren*'s methodology for calibrating wind data also relies on the work done by others in the Four Corners region, which is a very flat, desert type area that is inappropriate for other types of topography, including the canyon-topography landfills located in

[95] EPA-HQ-OAR-2019-0424-0256 Technical Support for Supplemental Revisions to subpart HH; Municipal Solid Waste Landfills, at 3.
[96] *See discussion supra* in Section III.C.1.

California. These calculations are highly sensitive to accurate wind modeling, making *Duren*'s use of a wide geographic NOAA data area questionable. In particular, *Duren's* approach was to use NOAA data, and subdivide the area around the landfill into 3 km squares, averaging the 9 closest squares into the "average site windspeed and direction" and applying that to the detected concentrations.[97] But plumes are not formed in that manner in challenging topographical areas. As with the point above, more recent publications from *Duren* and others, as well as other industry presentations, recognize that canyon landfills are notoriously difficult from which to quantify emissions.

Like *Nesser*, which utilized satellite data to support its findings, the integrity of the aerial measurements collected in *Duren* cannot provide adequate support for the lowered collection efficiencies across the entire MSW landfill sector for the same reasons.[98]

4. <u>**Other papers and emerging studies do not support EPA's reduction in collection efficiency determination.**</u>

EPA, industry participants, and third parties continue to actively assess the value of remote sensing techniques for landfill emission quantification. While there is great interest and optimism around this topic, specific conclusions around collection efficiency values are premature. For example, in its comments to the 2023 Supplemental Proposal, Carbon Mapper has pointed out that there is "no existing system to validate or revise GHGRP reporting" based on "observed emissions rates using remote sensing."[99] Instead, Carbon Mapper suggested an multi-tiered monitoring approach to validate reported annual emissions by using a system to quantify "total site-wide emission sources" using "high-frequency to continuous monitoring."[100]

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[97] *Duren* et al., at 181.
[98] *See supra*, Section III.C.1.
[99] EPA-HQ-OAR-2019-0424-0324, at 5.
[100] *Id.* at 5.

In addition, in responding to EPA's stated concern in the 2023 Supplemental Proposal about large release events, Carbon Mapper recommended the use of site-specific data to aid in assessing these events to avoid double counting, including "construction periods and locations, type of GCCS and combustion devices, any use of automated well tuning, monitoring methods used (including non-regulatory, voluntary monitoring), and cover types used."[101]

To the extent that EPA intended to rely on top-down, direct measurement technologies to support the reduction in collection efficiencies, EPA improperly extrapolated data that, if collected on a continual basis, would tend to prove the opposite conclusion. For example, a study by *Cusworth*, et al. found that "[o]n average, aerial emission rates were a factor of 2.7 higher than GHGRP for all landfills and a factor 1.4 higher for landfills with 10+ unique overpasses. Consistent with this study, independent assessments of US emission inventories have indicated a needed 1.25 to 1.5 scaling of waste emissions to reconcile inventories with in situ ground-based measurements and coarse resolution satellite observations."[102] These findings emphasize even the Nesser authors' direct acknowledgement that the average of more point-in-time observations for a single site tends to agree more closely with annual inventory estimates; providing evidence that there is not enough data to support the extrapolated claim that observations are more representative than annual inventory estimates. The recency of the *Cusworth* publication reinforces the imperative raised by the Petitioners in their comments: that EPA should wait to promulgate changes to subpart HH in anticipation of forthcoming data that will provide more appropriate support for comprehensive changes.

[101] *Id.* at 5.
[102] Cusworth, et al., *Quantifying methane emissions from United States landfills*. 383 SCIENCE 1499 (2024).

As discussed *supra* in Sections III.C.1 and III.C.2, remote sensing measurements using satellite and aircraft systems like TROPOMI and AVIRIS-NG, described in *Nesser*, et al., 2024 and *Duren*, et al., 2019, can only be made during daylight hours, causing landfill emission rates derived from these approaches to be biased high because the measurements are made during active landfilling operations and do not capture the period when the landfill is not receiving waste. Another study, *Delkash*, et al., 2022, used eddy covariance ("EC") measurements to assess diurnal variations in methane emissions and "showed that short-term tracer correlation method ("TCM") measurements conducted between 12:00 and 18:00 overestimate diurnal emissions estimated by the EC tower up to 73% at this site."[103] The EC methodology is able to operate continuously to capture concentration measurements to support emissions estimates over longer durations in a wide range of meteorological conditions and atmospheric stability classes. The study reported significant diurnal variation in methane flux at one landfill where EC and TCM were deployed over three seasons, and found that daytime methane flux rates were up to 23 times higher than nighttime fluxes.[104] Moreover, the daily average of EC observations presented a lower estimated emission rate when compared to tracer correlation method observations, a methodology similar to that used in the *Duan*, et al., 2019 study. While the *Delkash* study included only one landfill, its findings point to the potential bias of relying on daytime only measurements to determine landfill emissions rates, particularly when those rates will then be compared to annual rates like the GHGRP. The study, therefore, stands for the same conclusion articulated above: assessing the accuracy of the GHGRP modeled rates requires measurement methods that continuously monitor both point-source and diffuse emissions so as to better

[103] Delkash, et al., *Diurnal landfill methane flux patterns across different seasons at a landfill in Southeastern US*, 144 WASTE MANAGEMENT 76, 85 (2022).
[104] *Id.* at 76.

understand diurnal and seasonal variations to compare point-in-time observations to annual emissions inventory estimates.[105]

IV. Basis for Relief and Proposed Next Steps

Overall, EPA does not articulate a rational connection between the scientific and technical evidence relating to landfill collection efficiency and the decision to stray from its proposal and apply a uniform approach to collection efficiency values uncoupled from SEM. While NWRA did not support the SEM-based approach advanced by the 2023 Supplemental Proposal for the reasons expressed in our comments, we acknowledge the importance of site-specific design and performance factors in assessing collection efficiency. EPA's Final Rule is the opposite of a site-specific approach, based on SEM or otherwise. We expected the Final Rule to be the logical outgrowth of the proposal to tie collection efficiency adjustments to SEM. We also recognized that the proposed coupling of collection efficiencies and SEM served as an incentive for "non-regulated" landfills to implement SEM to avail themselves of the higher collection efficiencies. Lowering collection efficiency regardless of SEM now may have an unintended effect—if Reporters know that they can never achieve greater than 85% efficiency in estimating emissions under the GHGRP, there is little incentive to increase efficiency. EPA's simple explanation that lowered collection efficiencies are warranted in light of the agency's review of "direct measurement data for landfills" leaves an unfillable gap in reasoning and logic, warranting reconsideration.

NWRA and its members recognize the importance of developing technologies and ongoing studies and analyses of direct measurements and remote sensing data. The MSW landfill sector is deeply engaged in this work, in partnership with EPA's Office of Air and Radiation as

[105] *Id.* at 85; *see also* Stark, et al., *Investigation of U.S. landfill GHG reporting program methane emission models*, 186 WASTE MANAGEMENT, 86, 86, 91 (2024).

well as its Office of Research and Development, Carbon Mapper, GHG Sat, RMI and others. Through SWICS and company-specific data analyses, NWRA anticipates that it will have a substantial set of data to share with EPA in the very near term, after appropriate quality control and assessment is complete. The data will consist of direct measurements, correlated with site-specific SEM and operational conditions, and evaluations of resulting emission impacts. NWRA will share this data with EPA in the proposed reconsideration period to help inform EPA's perspective on collection efficiencies. Most importantly, to the extent that these advancements assist in the strengthening of emission quantification and information, and thereby provide avenues for improvements in methane capture, the GHGRP should be structured to acknowledge and account for such improvements. The Final Rule unfortunately has the opposite effect, by imposing reduced collection efficiencies across the board, based on overgeneralized and qualitative theories that do not support the determination that was made.

As set forth at length above, NWRA requests that EPA grant reconsideration of the reduced collection efficiencies set forth in Table HH-3 of the Final Rule. Interested parties were not afforded the opportunity to comment on EPA's finalized collection efficiencies because they were not a "logical outgrowth" of the Proposed Rules.

To the extent that EPA declines to grant reconsideration on the bases set forth in Section 307(d)(7)(B) of the Clean Air Act, the Petitioner asks that EPA treat this submittal as a petition for rulemaking under the Administrative Procedure Act, 5 U.S.C. § 553(e), which is a "procedural right." *Massachusetts v. EPA*, 415 F.3d 50, 53 (D.C. Cir. 2005) *rev'd and remanded on other grounds by* 549 U.S. 497, 527 (2007); *Friends of the Earth v. EPA*, 934 F. Supp.2d 40, 54 (D.D.C. 2013) ("EPA is required to respond to a citizen petition for rulemaking.").

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EXHIBIT 2

A Controlled Release Experiment for Investigating Methane Measurement Performance at Landfills

Final report

Revised on July 9, 2024

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This report was prepared for the Environmental Research and Education Foundation (EREF) by

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Executive Summary

A large-scale controlled release study was performed at a closed landfill in Petrolia, Ontario Canada between November 6, 2023, and November 14, 2023. During this time, 16 combinations of vendors and methodologies were assessed for their performance of quantification and detection of methane during 71 experiments.

For quantification performance, ground and aerial methodologies were used. Fenceline truck-based measurement systems using the Mobile Gaussian Plume Assessment (MGPA) method underestimated emission measurements, on average by 47% and with an uncertainty of ± 43%. Uncertainty around MGPA measurements reduces with better atmospheric factors, but timing constraints led to lack of replicates. Mobile Tracer Correlation Emission Assessment (MTCEA) on average underestimated emissions by 11% and had an uncertainty of ±20%. The drone-based UAV Point Sensor Emission Measurement (UPSEA) vendors displayed tendencies to both over- and underestimate. The UPSEA method provided good quantification estimates – vendor C reported very few outliers, with vendor D having a greater spread. Vendor C on average overestimated emissions by 14 % and had an uncertainty of ±34%, while vendor D on average underestimated emissions by 11% and had an uncertainty of ±62% but demonstrated sensitivity to atmospheric stability and reported fewer than other vendors (n<10). Aerial-based Light Detection and Ranging (LiDAR) systems improved when they were revised using onsite weather data, resulting estimates on average overestimated by 45% with an uncertainty of ± 45%. Remote Point Sensor Emission Assessment (RPSEA)offers a low maintenance option for measuring emissions with uncertainty of ± 39% in the best-case scenario. RPSEA is currently in the early development stages, with variability across vendors.

MTCEA, LiDAR, and UPSEA delivered minimal bias and generally delivered low variability. However, all are relatively specialized tools requiring specialized equipment and knowledge and may not be useful or available to all sites. Although trucks tended to under-estimate and were more volatile, they delivered estimates that were on average within a reasonable margin of the actual values and would therefore be reasonable alternatives for some applications like rapid screening, in suitable conditions. LiDAR had the best detection performance; it was able to detect 100% of the emitting sources, without false positives.

For detection performance, UAV Column Sensor Emission Assessment (UCSEA) systems detected dispersed source releases above 10 kg/hr on even ground. However, the detection performance deteriorated when scanning on slopes, with either very limited or no detections reported. The two UCSEA systems reported false positives fractions of 0.79 and 0.83, which is the ratio of false positives to total reported detections. LiDAR-based detection systems are very sensitive to emissions and detect emissions as low as 1 kg/hr. UCSEA can improve with changes in work practice and more testing and may eventually be capable of replacing walking surface emissions measurement.

This study highlights the need for further research in several areas related to methane emission quantification in a landfill setting. Validation of the Satellite Imaging Sensor Emission Assessment (SISEA) method is of high priority and will require future controlled release configurations of over 300 kg/hr during low cloud cover months. Studying methane emission rates during day and night cycles and variability among methodologies are important factors to advance landfill methane measurements. A permanent or long-term, buried underground release setup would facilitate frequent research and validation opportunities.

Contents

AGL	Above Ground Level
CGU	Canadian Geophysical Union
CMOS	Canadian Meteorological and Oceanographic Society
CNG	Compressed Natural Gas
CSA	Canadian Standards Association
ECA	Environment Compliance Approval
ECCC	Environment Climate Change Canada
ELARS	Eastern Landfill Atmospheric Research Station
ERA5	5th gen. European Centre for Medium-Range Weather Forecasts Reanalysis
HRDEM	High Resolution Digital Elevation Model
ICI	Infrared Cameras Incorporated
LEA	Lagrangian Emission Assessment
LFG	Landfill Gas
LiDAR	Light Detection and Ranging
MDL	Minimum detection limit
MECP	Ministry of the Environment, Conservation and Parks
METEC	Methane Emissions Technology Evaluation Center
MGPA	Mobile Gaussian Plume Assessment
Mid-IR	Mid-infrared
MOS	Metal Oxide Sensor
MTCEA	Mobile Tracer Correlation Emission Assessment
NETL	National Energy Technology Laboratory
OTM51	Other Test Methods-51
PD	Probability of Detection
PRS	Pressure reduction system
RPSEA	Remote Point Sensor Emission Assessment
SISEA	Satellite Imaging Sensor Emission Assessment
TDLAS	Tunable diode laser absorpotion spectroscopy
TSSA	Technical Standards and Safety Authority
UAS	Unmanned Aircraft Systems
UAV	Unmanned Aerial Vehicle
UCSEA	UAV Column Sensor Emission Assessment
UPSEA	UAV Point Sensor Emission Assessment
WM	Waste Management

1. Introduction

Landfills contribute approximately 16% of the anthropogenic methane emission in the United States (Delkash et al., 2022). There are several methane measurement methodologies available; however, few are validated, and none are recognized as an international reference method. Main challenges in measuring methane emissions from landfills is the temporal and spatial variability. Emission rates can vary by up to 7 orders of magnitude within few meters, which is primarily caused due to cracks or holes in the soil cover, this causes emission hotspots or elevated levels of methane concentration (Mønster et al., 2019). However, landfill operators lack reliable information on measurement tools that will provide data to meet Environmental, Social, and Governance (ESG) criteria, requirements imposed on publicly traded companies to disclose verified emissions, or measurement requirements that may be part of future governmental regulations. As the urgency of the climate crisis has grown, so too has the array of measurement technologies and methodologies used to evaluate emissions. These methodologies can help operators better understand their emissions and meet emission reduction targets, if their accuracy is validated.

This controlled methane release study was conducted at a closed landfill in Petrolia, Ontario between November 6 and 14, 2023. The selected site was, in many ways, an ideal controlled release test site insofar as both FluxLab and ECCC (Environment Climate Change Canada) conducted past measurements there, providing a solid baseline understanding of the characteristics of the landfill. Additionally, this site has the appropriate morphology, low emissions, and no interfering neighboring methane sources.

All the methodologies tested in this study can survey landfills for emissions, but each has different dependencies, costs, speeds, and uncertainties. We assembled a varied group of methodologies to assess their performance under controlled conditions to help educate landfill operators and regulatory bodies about the benefits and drawbacks of different measurement methodologies. Results are also meaningful to the renewable natural gas sector.

Unlike oil and gas sources, landfill emissions are highly variable. Methodologies used to measure landfill emissions are, therefore, likewise varied and offer different capabilities. For this reason, we divided the participating methodologies into three groups. One group specializes in localization capabilities, meaning they can identify where emissions are coming from. The second group consisted of methodologies that specialized in quantification, meaning they can identify how much is being emitted. The third methodology group had both localization and quantification capabilities.

The study sought answer three main questions:

1. How do different methodologies perform in various meteorological conditions?
2. What are the quantification accuracies of different methodologies?
3. What are the localization accuracies of different methodologies?

2. Methods

2.1. Facility Selection

The Petrolia landfill located at 4052 Oil Heritage Road, Petrolia, Ontario (42°52'19"N 82°7'14"W; Figure 1), near Sarnia, is a closed landfill once owned and operated by the Town of Petrolia and by Waste Management (WM) Canada since 1990. The site closed its gates to new garbage in June 2016 after decades of operation (approval signed in 1982) but still operates as a transfer station for a nearby WM waste collection facility. The site is approximately 41.23 ha, and 26.02 ha was used for the disposal of municipal, industrial, and commercial solid wastes. It was approved for a total capacity of 4,749,000 m^3 and its reported fill rate was 365,000 t/y (65,000 t/y of Municipal waste from the Municipalities within the County of Lambton and 300,000 t/y of Institutional, Commercial, and Industrial waste from the Province of Ontario). Incoming waste was deposited into excavated cells below ground level in the local clayey soil. Figure 2 shows a drawing of the layout of the Petrolia landfill. The site has now been capped, top-soiled and seeded.

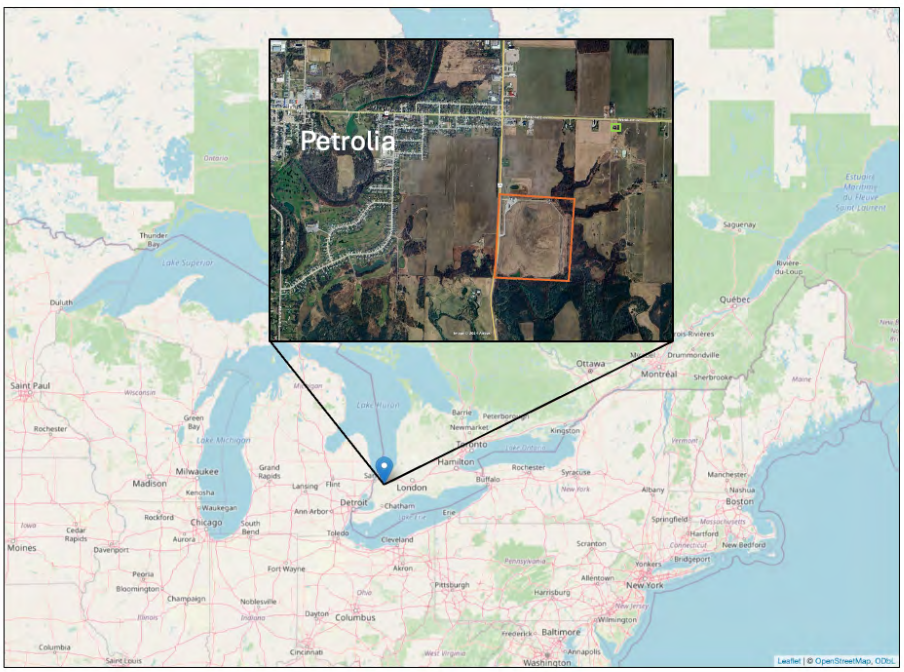

Figure 1: Petrolia landfill location. The blue marker positions the landfill in Ontario. In the inset, the landfill perimeter is outlined in orange. The location of a known cluster of oil & gas batteries is highlighted in green.

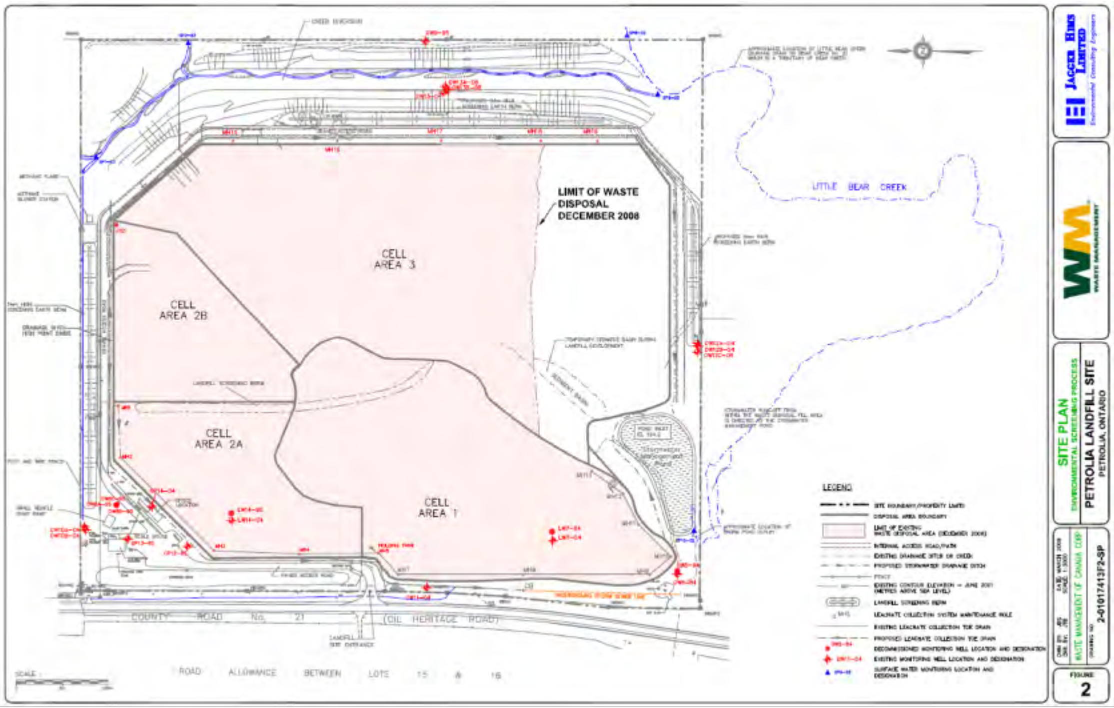

Figure 2: Petrolia Landfill Site Layout (Jagger Hims Ltd. 2009)

The landfill collects contaminated runoff from rain and moisture, known as leachate, and sends it to alternative municipal treatment facilities via sewer lines.

This site has a Landfill Gas (LFG) Collection and Flaring system. In 2010, the landfill commenced the operation of a landfill gas-to-energy project which converts methane gas into enough energy to power 2,500 homes (up to 3.2 megawatts of electricity, WM projected number, 2009). Bluewater Power Generation continues to generate electricity at the Petrolia landfill, even after the landfill stops accepting waste.

From the 2020-2021 Ministry of the Environment, Conservation and Parks (MECP) report, 2,710 tonnes CH_4/y of methane was recovered in 2021 and all of it was utilized (none was flared). This site is not reporting its emissions to the Canada Greenhouse Gas Reporting Program (GHGRP).

Environment and Climate Change Canada surveyed the site in September 2021 with a mobile laboratory and estimated emission of 19.7 kg/hr or 173 tonnes CH_4/y using a Gaussian dispersion model (Sebastien Ars (ECCC) presentation on June 7th, 2022, at CGU/CMOS joint-meeting). Using the same measurement technique and processing, FluxLab surveyed this site in July 2022 and obtained a similar emission rate: 20kg/h or 175 tonnes CH_4/y. The landfill methane emission rate was also estimated prior to the releases in November 2023 using a tracer-based method (labeled as technology E in this study) and determined to be 24.44 kg/hr or 214 tonnes CH_4/y.

The site's topography is moderately complex and typical of a landfill (Figure 3). The cells are like hills that slope away from the center. The highest point of the landfill is about 35m above the outer edges and the surrounding areas which are generally flat and used as croplands or covered with trees.

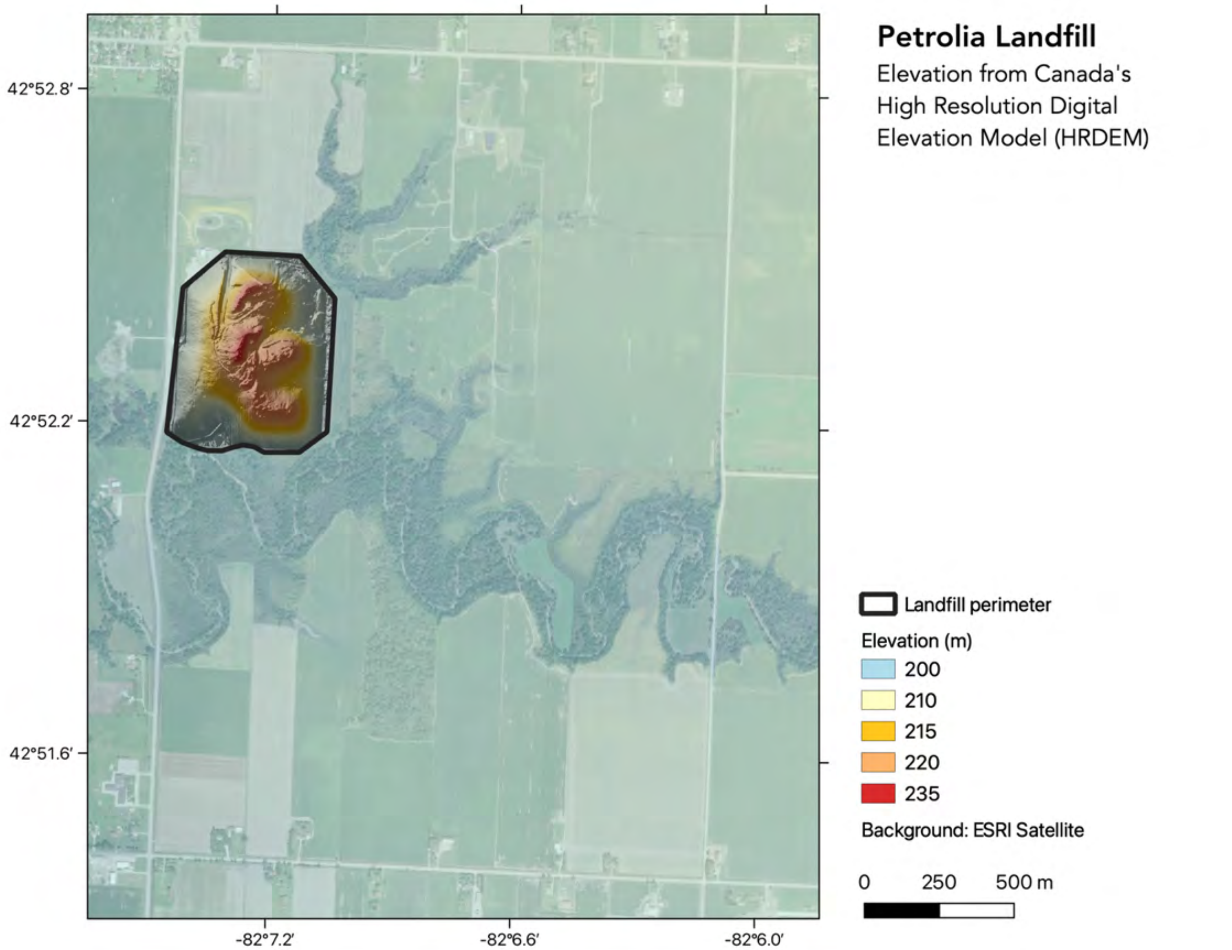

Figure 3: Petrolia landfill and surroundings elevations

A known source of methane emissions is located approximately 900m northeast of the landfill (see Figure 1). This source comprises several oil and gas tanks.

The climate of Petrolia, located in Lambton County, is tempered by the Great Lakes. Lakes contribute humidity to the atmosphere, increasing precipitation in fall and winter. Warm lake temperatures also lead to milder winters. In contrast, in summer, the cool waters of the lake temper the warm tropical air from the south. We used data from ERA5, ERA5-land (the latest climate reanalysis produced by ECMWF, the European Centre for Medium-Range Weather Forecasts) and Historical Climate data (ECCC). Our wind analysis (Figure 4) suggests that from September to November, the prevailing winds are West- Southwest and occur between 1:00 pm and 4:00 pm.

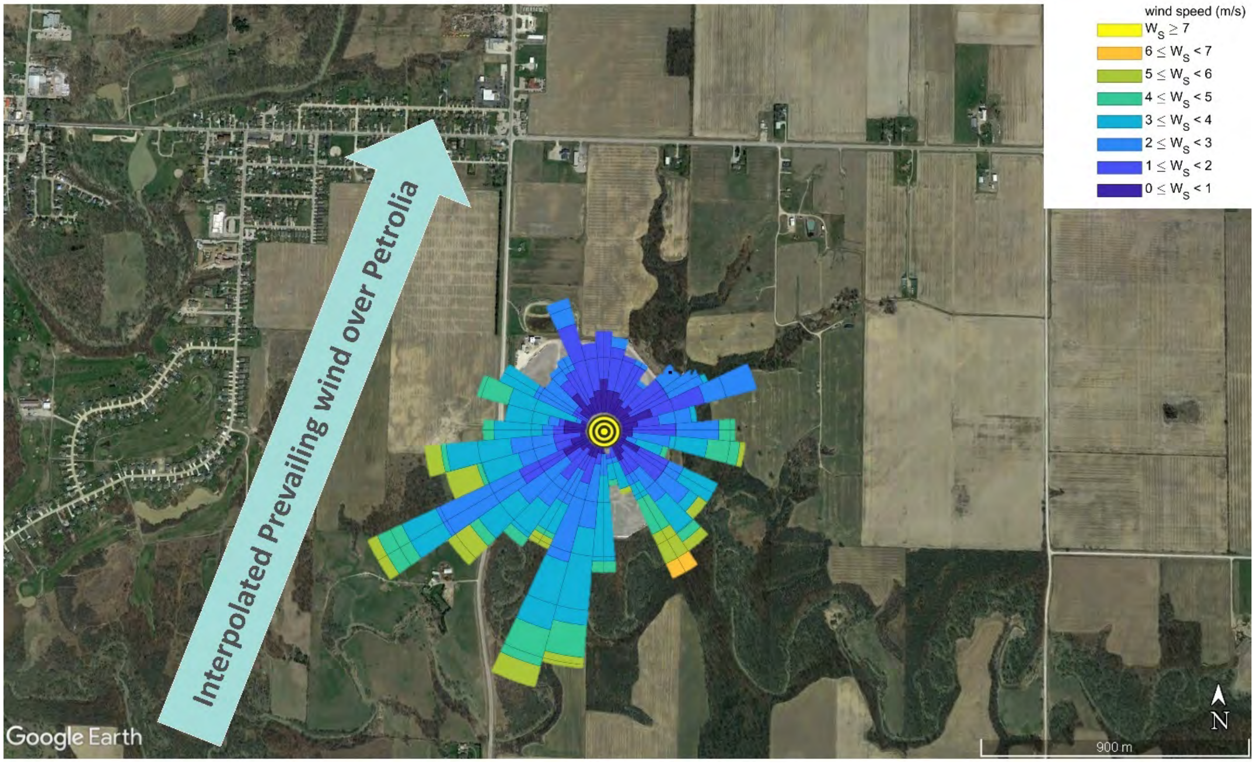

Figure 4: Wind rose patterns based on ERA5, ERA5-Land, and Sarnia historical climate data

Petrolia has several recreational facilities such as a recreation center, soccer fields, baseball diamonds, track and field, and a golf and curling club. However, all these facilities are located more than 800 meters away to the west of the Petrolia Landfill. Additionally, the site does not have public access, meaning that vendors and service providers were able to access/use the site without hindrance. Having a gas collection system, the relatively low background emission and the distance from public activities made the Petrolia site an ideal location for this study. Its central location in North America facilitated the participation of many vendors.

WM Canada generously offered the site to run this controlled release study and helped overcome various permitting and installation challenges. Two permits were required to execute the controlled release study at the site. The first was a technical permit to ensure gas transfer system safety and its compliance with guidelines set by the Canadian Standards Association (CSA). This permit was issued by the Technical Standards and Safety Authority (TSSA), which is Ontario's public safety regulator for various devices and equipment. This study was assessed by the Fuels division and a variance approval was secured, in relation to CSA code B149.1 which outlines the installation code for natural gas propane, that was used as a reference for the variance application. The TSSA approved the gas release system and inspected it on several occasions. The second permit covered the environmental and public impact of carrying out these activities at the landfill and releasing methane, and acetylene as a tracer gas (see section 2.3). This Environment Compliance Approval (ECA) was issued by the Ministry of Environment, Conservation and Parks (MECP). Since this study was using a temporary setup, a streamlined application stream was used. In addition to the application, immediate neighbors of the landfill property were contacted, and a fifteen-day consultation period was observed.

2.2. Methodology for Vendors

The experimental protocol for this study was based on METEC's survey protocol, which was built by the Methane Emissions Technology Evaluation Center (METEC) at Colorado State University. The base protocol was primarily written to validate oil and gas emission measurement technologies. The adaptation of the METEC method mostly relies on the fact that in oil and gas, the main components are point sources while landfill emissions come from multiple sources or even areas. The rate of emission from a landfill is also expected to be much higher than for oil and gas sites. Many publications used the application of the METEC method for controlled release studies (Day et al. 2024, Ilonze et al. 2024, Mbua et al. 2023, Bell et al. 2023) and among those Sonderfeld et al. 2017 were also focused on active face emission in landfills.

To reflect a landfill-based study, the main protocol changes were:

1. Classification of point and area source releases
2. Meteorology measurement details
3. Simplification of experiment cycles
4. Removal of oil and gas measurement-specific analysis (e.g. classification of detections on equipment unit)

Some vendors used the same technologies, and so where appropriate within this report we refer to testing methodologies, instead of using "technology" or "vendor". The primary experimental flow involved informing scheduled participants about the timings of the controlled releases using cellular application/ text message. Methodologies were used during their specified time. Short 5 to 15-minute breaks between releases were introduced to allow the test center to alter release configurations and vendors to prepare for the next set of releases.

The protocol emphasizes the need for transparent documentation without revealing proprietary information. The first step includes documenting the configuration of survey solutions, such as system components, software revisions, methodology, and personnel involved. In the next step, vendors conduct emission detection within defined facility boundaries, documenting controlled releases and survey data. The process involves establishing experimental design points, conducting surveys, and submitting data to the test center and the final step requires vendors to report experiment and detection data, including survey summaries and facility quantification data that includes essential details such as experiment and facility IDs, survey start/end times, and emission rates.

One of the key protocol features is having separate evaluations for emission quantification and localization. The primary metrics for each involve different sets of assessments. The emission rates and location for the controlled release points are the true values for the evaluation of the vendors' performance.

Classification of detection involves categorizing detections as true positive or false positive based on accuracy in identifying controlled releases. The metrics for detection are as follows:

1. Probability of Detection (PD): This metric evaluates the likelihood of correctly detecting emissions under different environmental conditions. It considers the number of true positive detections in relation to controlled releases.
2. False Positive Fraction: It assesses the ratio of false positive detections to total reported detections, providing insights into the rate of erroneous detections.
3. False Negative Fraction: This metric indicates the ratio of false negative detections to total controlled releases, highlighting instances where emissions were not detected.
4. Survey Time: This measures the duration of emission surveys, considering the time from the start to the end of the survey.

For localization techniques and models, primary metrics focus on the precision and accuracy of localization, particularly in pinpointing the exact emission points identified by the detections. The uncertainty in finding the sources was introduced mostly by the precision of the instruments or the error percentage of the method of analysis.

For further evaluation, secondary metrics were put in place: 1) Quantification Accuracy evaluates the accuracy of reported emission rates compared to metered rates, both in absolute and relative terms; 2) Quantification Precision assesses the precision of reported emission rates, providing insights into the consistency of measurements and, 3) Localization Accuracy and Precision delve into the accuracy and precision of reported coordinates or bounding boxes, offering detailed insights into the spatial accuracy of detections.

Survey efficiency, survey speeds, and annualized costs are evaluated based on actual survey reports submitted, offering practical insights into the efficiency of survey operations.

Overall, these metrics provide a comprehensive evaluation of detection systems' performance, considering factors such as accuracy, precision, efficiency, and environmental conditions.

Two weeks after the data collection phase, vendors were required to submit their estimates. Quantification methodology providers were instructed to provide their rate estimates in kg/hr and localization methodology providers were instructed to provide coordinates of leak estimates. After the first round of submissions, vendors were provided on-site weather data by the test center and allowed to resubmit estimates. Releases during the quantification phase of the study (1^{st} week) ranged from 30 to 50 min releases in most cases with a greater range of release rates being used. During the localization phase of the study (2^{nd} week) releases ranged from 60 to 90 min and the releases were usually below 100 kg/hr in most cases.

The rate estimates provided by vendors in kg/hr were compared against the sum of average flowmeter values that vendors participated in. The results are displayed using parity charts in Figures 3-5 with linear regression values listed in table 5. For the analysis of methodologies performing offsite measurements, vendor estimates were compared against the total site emission rate, which was calculated by adding the background emission rate and total gas release rate. The background emission rate was determined to be 24.44 kg/hr (Std. dev 8.88 kg/hr) using the Tracer correlation method. For analysis of methodologies performing onsite measurements (near the border of the release area), estimates were compared against only the total gas release rates.

Detection methodologies were assessed by classifying leak estimates provided by vendors into three categories, true positive, false positive and false negative. Leak coordinates provided by vendors were mapped using software (QGIS 3.34.2) along with release point/area coordinates. Active emitter locations were compared against vendor estimates to analyze localization performance.

A 15 m x 15 m bounding box was drawn with the release point at the center for active release points. Leak coordinates that fall within the bounding box are considered true positives. To account for GPS uncertainty, leak coordinates within 5 meters of the bounding box were also considered true positives. Leak coordinates outside of the bounding box are considered as false positives. Active leak points that were not detected were classified as false negatives. Figure 5 shows a detection map for one of the experiments where there were two active emission sources (shown with a bounding box) and the leak coordinates provided by the vendor (shown with a red dot). Release points are shown in a white circle with a black dot, inactive release points are shown without a bounding box. Using the categorized leak estimates, methodologies were assessed for the probability of detection, false positive and negative fractions. Equations 1-4 list the primary factors used to assess detection performance. Appendix C contains assessment summary maps for detection methodologies.

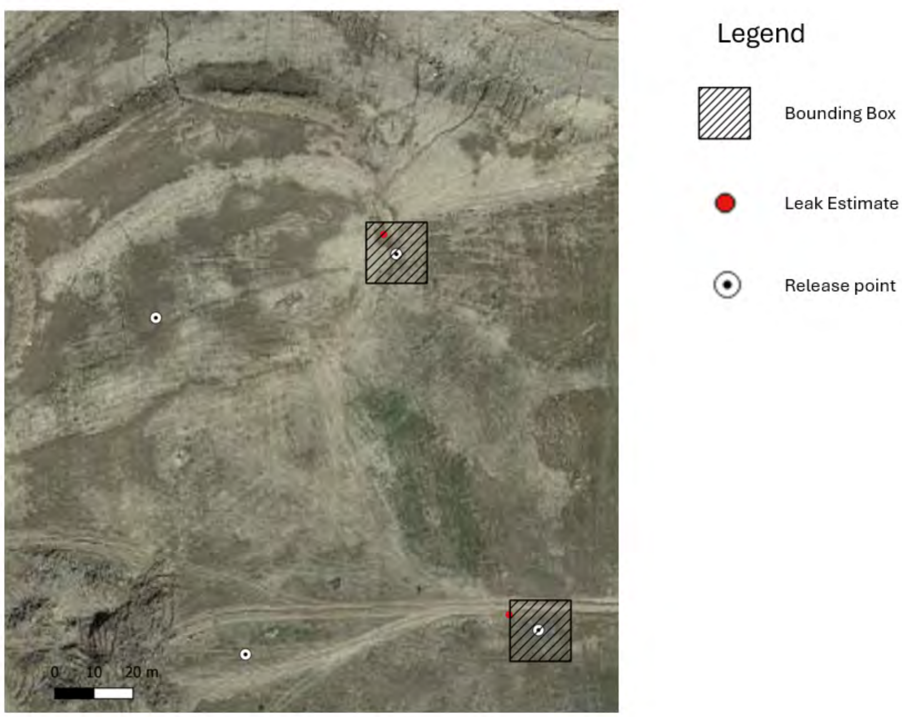

Figure 5: Sample detection map

$$PD = \frac{n_{TP}}{n_{TP} + n_{FN}} \quad \text{...(1)}$$

Where PD is the probability of detection , n_{TP} is the number of true positives and n_{FN} is the number of false negatives.

$$FPF = \frac{N_{FP}}{N_{RD}} = \frac{N_{FP}}{N_{FP} + N_{TP}} \quad \text{...(2)}$$

Where FPF is the false positive fraction, N_{FP} is the total number of false positives, N_{RD} is the total number of reported detections and N_{TP} is the total number of true positives.

$$FNF = \frac{N_{FN}}{N_{CR}} \quad \text{...(3)}$$

Where FNF is the false negative fraction, N_{FN} is the total number of false negatives and N_{CR} is the total number of controlled releases.

$$LA = \frac{N_{TP}}{N_{RD}} = \frac{N_{TP}}{N_{TP} + N_{FP}} \quad \text{...(4)}$$

Where LA is the localization accuracy, N_{TP} is the total number of true positives, N_{RD} is the total number of reported detections and N_{FP} is the total number of false positives.

$$\mathrm{TNR} = \frac{N_{TN}}{N_{FP} + N_{TN}} \quad \text{...(5)}$$

Where TNR is the true negative rate, N_{TN} is the total number of true negatives, N_{FP} is the total number of false positives.

3. Setup

The controlled release system for the study was a non-permanent pipeline network of mostly polyethylene pipes placed above ground on approximately a 10-acre (4 hectares) section of the landfill. Release points were set up in various elevations of the landfill. A CNG trailer was used as the source of methane for the study. With combined release rates ranging from 1 kg/hr - 300 kg/hr, methane was released from point and diffused sources. Between November 6th and 14th, 3025.81 kg of methane were released.

The field team initially mowed sections of the landfill where pipelines would be placed. Using a combination of manual and mechanical approaches, sections of the landfill were dug. G1 technicians were responsible for sourcing materials and making connections between polyethylene and metal pipes. Alicat MCR series flow controllers were placed in black plastic containers and connected to the pipeline network. Flow controllers were calibrated by the manufacturer prior to using it for this study. With a standard accuracy of ± 0.6% of reading or ± 0.1% of full scale, flow rate data was collected every 1 second. Wiring work involved connecting flow controllers to a console which allowed gas to be released remotely. A laptop was connected and used to monitor the flow controller performance. Appendix B lists the equipment used to set up the pipeline network.

The controlled release setup was designed with 8 points and 2 dispersed sources. Point source releases simulate emissions from membrane tears and wells, whereas dispersed source releases simulate emissions from landfill's active face. Elevated metal nozzles with a release rate of up to 19.7 kg/hr were used for point sources. For dispersed sources, a perforated tube spread over 10-15 cm of soil covering an area of about 170 m^2 was used. Dispersed source points were able to release methane up to118.3 kg/hr Flow controllers recorded flow in standard litres per minute (SLPM). Each release source was regulated and monitored in real time by using ATEX-certified Alicat flow controllers which were installed at the end of each downstream branch of the pipeline. During releases, participants and test center personnel did not have access to the detection facility for safety and permitting requirements.

Methane gas was sourced from Enbridge and supplied by Certarus. Natural gas with composition of 94.5% methane, 4.5% ethane, 0.09% propane, 0.4 % nitrogen, and 0.4 % carbon dioxide, was used for the study. A bulk CNG trailer was connected to a small pressure reduction trailer which decreased the pipeline inlet pressure to approximately 55 psig. The pressure reduction trailer also had a relief valve with a set pressure of 80 psig to protect downstream piping. Sections near polyethylene fittings were covered with soil and grass was cut to stubble length on areas where the pipeline lay on the ground.

Flowrate data from flow controllers was compared with the end-of-day gas use report from Certarus which is generated by the onboard pressure reduction system (PRS) trailer software. When comparing the amount of gas released between the flow controllers and PRS software there was a difference of 5 percent. Gas flow performance was monitored from the PRS trailer and the remote-control center. Mass flow values from flow controllers were used for analysis in subsequent sections. Flowmeters have an uncertainty of 0.6% and the error propagation is calculated using the root sum of squares. Average flowmeter readings for each experiment are listed in Appendix A.

Three weather stations were set up to collect meteorological data as shown in Figure 6. Onsite weather data such as windspeed, barometric pressure, wind direction, etc. were collected and later sent to vendors. Campbell Scientific weather sensors (MetSens200 and MetSens500) were used for the study (see Appendix B for specifications). Weather sensors were factory calibrated prior to the study and weather stations were checked daily by FluxLab team members to ensure equipment was in proper operating condition.

The test center designed release configurations based on participating methodologies. Each experiment was matched with a corresponding release with distinct flow rates and active emission patterns. When possible, the test center ran duplicate scenarios to assess consistency in methodology performance. Measurements taken in between releases were used to determine the background emission rate which was utilized in the assessment of methodologies taking fence line measurements.

Figure 6: Map of Controlled Release Setup

4. Participating Technologies

Table 1 lists sixteen methodologies, which were a combination of vendors and technologies, participated in the study. Appendix D summarizes methodology properties such as cost, minimum detection limit and limitations. Due to confidentiality agreements, results are arbitrarily identified by an anonymized identifier.

Table 1: Summary of methodologies that participated in the controlled release study

Technology Identifier	Technology Type	Platform Type	Sensor	Method	R&D ?
A	Quantification/ Detection	Truck	LGR	MGPA	No
B	Quantification	Truck	LICOR	MGPA	No
C	Quantification/ Detection	Drone	TDLAS	UPSEA	No
D	Quantification	Drone	Mid-IR LDS	UPSEA	No
E	Quantification	Truck	Picarro	MTCEA	No
F	Quantification	Aircraft	Picarro	APSEA	No
G	Quantification/ Detection	Helicopter	LiDAR	LiDAR	No
H	Quantification/ Detection	Satellite	Spectrometer	SISEA	No
I	Quantification	Fixed	EM27	RPSEA	Yes
J	Quantification	Fixed	Metal Oxide	RPSEA	Yes
K	Quantification	Fixed	Metal Oxide	RPSEA	Yes
L	Detection	Drone	TDLAS/ Laser Falcon	UCSEA	No
M	Detection	Drone	TDLAS/ Laser Falcon	UCSEA	No
N	Quantification/ Detection	Truck	LGR	LEA	Yes

Participants were asked to submit information about their respective solutions using a provided technology questionnaire. Most technologies in this study offer methane quantification and a few offers detection or the ability to do both quantification and detection. Quantification technology providers were instructed to submit their estimated emission rate in kg/hr, upper limit of emission rate in kg/hr, lower limit of emission rate in kg/hr and measurement time for each experiment that they participated in. Detection technology providers were instructed to submit estimated leak coordinates (longitude and latitude) and measurement time. Technologies were also allowed to participate in the research and development (R&D) stream which allowed more flexibility in reporting timelines. Technologies in the R&D stream are either up and coming or looking to enter the methane monitoring market.

The following technology overview is based on the questionnaire vendors submitted prior to participating in the controlled release study, and materials in the public domain. In this description, we include the time it takes for an average measurement, the number of replicates included, and high-level cost estimates based on vendor day rates and daily productivity in this study and/or for oil and gas methane measurement service companies in Canada's competitive and mature regulated marketplace.

4.1. Mobile Tracer Correlation Emission Assessment (MTCEA)

The Tracer correlation method is considered the gold standard for landfill quantification measurement and has been used for over two decades (e.g. Mosher et al., 1999) and its errors have been extensively probed in previous works like Fredenslund et al. (2019a). The method involves a controlled release of a non-reactive gas, such as sulfur hexafluoride or acetylene, that is easy to detect and distinguish from other gases emitted by the landfill. The data collected on tracer gas concentrations are analyzed statistically to establish correlations between the tracer gas and the target gases (e.g., methane). By understanding how the tracer gas disperses throughout and downwind of the landfill, emissions of the target gases can be estimated. No wind measurements are required. The vendor performing tracer release work at Petrolia used a Picarro dual gas analyzer, working from the public road system. This method generally takes two days at an estimated $5,000 USD/day commercial rate. One day would be used for reconnaissance and setup, and another for measurement and tear-down, and in that timeframe the vendor could deliver several replicate measurements. With an annual budget of $20,000 USD for site measurements, MTCEA measurement visits could occur every 6 months.

4.2. Gas Mapping LiDAR (LiDAR)

Methane detection by LiDAR (Light detection and ranging) is a mature technology in oil and gas and is in widespread commercial application. Numerous point-source controlled release tests have proven its ability to detect point source leaks to 1-3 kg/hr with 90% probability (Bell et al. 2002, Singh et al. 2021, Conrad et al. 2023, Rutherford et al. 2023). While the method is applicable for landfill measurement, it has seen relatively limited use. Gas mapping LiDAR uses a pulsed beam of radiation that reflects off the ground surface, and back to the aircraft where a specialized receiver detects and analyzes the spectral signature of light absorbed or scattered by methane in the atmosphere. The result is a column measurement that can be used for detection or quantification.

Unlike other column-measurement instruments, LiDAR will normally yield information on where the gases sit within the measurement column, which could be used to augment sensitivity for ground-emitted gases. For a surface leak detection scan, the helicopter flies a serpentine pattern while holding a fixed altitude. Surface leak scans can be used for quantification, by adding up quantifications for individual plumes. For a quantification scan, which is a more developmental technique, the helicopter flies transects downwind and perpendicular to the emission source of interest and solves for emission rate using mass balance. Area-based emissions are common in landfills and may prove more difficult for LiDAR to detect and quantify. The measurement generally takes one day at an estimated $14,000 USD/day commercial rate. During a flight of several hours, the vendor would deliver many replicate quantification AND leak detection scan measurements. Aircraft vendors may charge for bad weather days when the aircraft is grounded. With an annual budget of $20,000 USD for site measurements, one LiDAR measurement visit could occur.

4.3. UAV Column Sensor Emission Assessment (UCSEA)

This technology consists of a UAV-mounted Tunable Diode Laser that emits a narrow beam of light at a wavelength appropriate to detect methane by using its spectral signature. The laser is carried on the underside of the UAV and is directed towards the ground. The laser beam reflects off the ground and back to the UAV. During its travel, the beam interacts with the gas molecules and some of the light is absorbed at specific wavelengths corresponding to the molecular absorption lines of methane. The technology is often called TDLAS, Active TDLAS, or a "column-type" sensor. Measurements are retrieved in ppm*m. Relative to LiDAR, the disadvantage of a column-type sensor is that methane in each unit distance of laser beam travel is incorporated into the ppm*m measurement. Most of the laser beam's transit is of course through atmospheric air containing relatively little methane. Therefore, a strong methane enhancement at the surface is diluted by the air above and can be difficult to detect, unless the sensor has very high precision, or flight altitude is reduced. Two vendors in our study were using UCSEA technology both with flight altitudes of 20 m and 30 m spacing for serpentine paths for leak detection. UCSEA is a new technology and has not been validated in controlled release studies, or by scientists in the peer review literature, although it is in use already to replace surface emission assessments at landfills that are normally done by walking the site. The measurement would generally take 2 days at an estimated $5,000-8,000 USD/day commercial rate. In that timeframe, the vendor would deliver one leak detection scan. With an annual budget of $20,000 USD for site measurements, an UCSEA measurement visit could occur every 6-10 months.

4.4. UAV Point Sensor Emission Assessment (UPSEA)

This technology uses a drone with a mounted TDLAS, MOS, or other point measurement sensor for landfill gas quantification. Two vendors participating in the study used UPSEA. In the method, the UAV flies repeated horizontal transects perpendicular to the wind direction and repeats the measurements at different altitudes to paint in a screen or curtain. Sometimes called a "flux plane" measurement, the method sees wind speed, temperature and pressure values interpolated across the plane, after which the interpolated values are used in a mass balance equation to solve for emission rate. Both vendors using this technique carried out their work using preprogrammed flight patterns. UPSEA is a mature technology and has been validated in point-source controlled release studies at oil and gas sites (Singh et al. 2021, Ravikumar et al. 2019). In the point-source controlled release study by Ravikumar et al. 2019, the authors found reasonable correspondence between measured and known emission rates for UPSEA with R^2 of 0.42, and an upward (overestimation) bias of 27%. The measurement would generally take 2 days at an estimated $5,000-8,000 USD/day commercial rate. In that timeframe, the vendor would deliver one aggregate quantification measurement assembled from several screen measurements in different parts of the landfill, each of which might take 1-2 hours for setup and flight. With an annual budget of $20,000 USD for site measurements, an UPSEA measurement visit could occur every 6-10 months.

4.5. Mobile Gaussian Plume Assessment (MGPA)

For this quantification technology, a high-performance methane analyzer deployed in a vehicle is carried along transects driven along the downwind fenceline, or on transects even farther downwind using the road network. Measurements can be made as far away as several kilometers. Wind speed and direction are measured alongside methane concentrations, and all are geolocated. Rate quantification involves the use of a Gaussian Dispersion model inversion, with some key differences. Since individual plumes emanating from a landfill have typically not coalesced by the time they reach the fenceline, the transects must be broken into small segments each of which incorporates a distance and peak height. A human using an air quality modeling system like Polyphemus (Ars, S. et al., 2020) can fit these area-based segments. Alternatively, a computational inversion can be used to find the best fit between all measured segments, and the combination of one or more simulated site plumes of x emission rate. Source height is normally incorporated into either type of analysis from a Digital Elevation Model, and normally the method would provide some estimate of probable source location. Two vendors used the MAGPA approach in this study. Whether using area-based MGPA (near or far field applicability) or peak height-based methods (far field applicability for plumes that have coalesced), the MGPA is an old and accepted method. A comprehensive study by Fredenslund et al. (2019b) found a good correlation between MGPA and the gold standard MTCEA (R^2 = 0.765), although MGPA showed a predictable low-bias where emission rate values were normally just 72% of those measured using MTCEA. The measurement would generally take one day at an estimated $5,000 USD/day commercial rate. In that timeframe, the vendor would deliver two quantification estimates, each comprising numerous replicate transects. In this study, it should be noted that because of the very fast-changing experiments, the average number of replicate transects being used for estimates was only ~2, whereas ~12 would be more normal work practice. With an annual budget of $20,000 USD for site measurements, a MGPA measurement visit could occur every 3 months.

4.6. Airborne Point Sensor Emission Assessment (APSEA)

For this mature quantification technology, a high-performance gas analyzer is mounted in a small aircraft. The aircraft flies stacked orbits of some radius slightly larger than the site. The first orbit is at about 150 m above ground level, or the lowest permissible flight altitude in Canada, and orbits are repeated at progressively higher altitudes until the aircraft reaches the top of the surface-mixed layer. Wind values may be measured in the air, or wind estimates are procured from databases. The wind and methane concentration are interpolated onto a flux screen around the site, and the flux rate is solved using a mass balance equation. Abbadi et al. 2023 found that this technology was highly correlated to known release rates (R^2 of 0.93), but consistently under-estimated emission rates with a low bias where predicted emission rates were only 52% of actual values. The low bias could result from the downward extrapolation approach used by this vendor (Erland et al., 2022), or potentially from measurements during highly stable atmospheric conditions where the center of mass for landfill plumes sites below the initiating flight altitude (~150m). The measurement would generally take one day at an estimated $14,000 USD/day commercial rate. In that timeframe, the vendor would deliver numerous quantification measurement estimates during a flight time of several hours. Aircraft vendors may charge for bad weather days when the aircraft is grounded. With an annual budget of $20,000 USD for site measurements, an APSEA measurement visit could occur once annually.

4.7. Remote Point Sensor Emission Assessment (RPSEA)

These quantification technologies consist of freestanding stations around the landfill perimeter in which various environmental sensors are used to measure wind speed, wind direction, temperature, pressure, and humidity. Methane detection is done using a metal oxide (MOS) sensor. Another type uses an open path Fourier Transform infrared (FT-IR) spectrometer. Algorithms are used to continually assess facility emissions using an inverse source dispersion model, or similar. RPSEA technologies have been scrutinized lately in oil and gas controlled-release studies (Bell et al. 2023, Day et al. 2024), with varying results. It is difficult to understand the transferability of these results to the landfill context, where sites are large, topographically variable, and where emissions are larger. While there are many RPSEA vendors on the oil and gas market, there are none yet purporting to measure landfill emissions with accuracy, and no validation studies for RPSEA in landfill applications. Several vendors in our study used RPSEA method. These measurements are continuous (~hourly) and unfortunately costs are poorly constrained since some business models will differ widely; some focus entirely on service whereas others combine hardware and service costs. We estimate annual costs of $7,000-30,000 USD depending on the vendor and size of the landfill. With an annual budget of $20,000 USD for site measurements, a site could possibly be measured several thousand times, or RPSEA may be too expensive to do on an annual basis.

4.8. Satellite Imaging Sensor Emission Assessment (SISEA)

A satellite-mounted sensor takes a series of images and collects methane column measurements for individual pixels. The images are merged, and an interference pattern is created which allows the quantification and detection of methane emissions at facility scale. Generally, SISEA will be expected to most easily detect large point source emissions within a facility, and area-based sources could be missed. Several studies have validated SISEA for point source emissions quantification, with good results at high emission rates. Sherwin et al. (2023) found that the most sensitive present-day satellite can detect a point source emission of as little as 170 kg/hr, although expected detection success would vary for area sources. Like UCSEA, the column enhancements of near-ground methane enhancements will be diluted by the overlying column of atmospheric methane. To detect methane from a satellite, very large ground-level concentrations are needed, and landfill-type area methane sources may be difficult to detect at this magnitude. These measurements could theoretically be delivered daily under clear sky conditions, but generally, a package of images and quantification estimates at some delivery frequency would be purchased for $3,000-6,500 USD each, depending on volume. With an annual budget of $20,000 USD for site measurements, a SISEA measurement could probably be made every 2-4 months.

4.9. Lagrangian Emission Assessment (LEA)

This method combines the type of truck-based sampling used in MGPA but pairs the measurements with a different post-processing algorithm. Lagrangian models are commonly used to predict source location probabilities and can be used to calculate emission rates for either point or area-based sources. Normally, Lagrangian models are applied to tower-based measurements, but can be adapted to a mobile setting, as if the tower were moving through the domain. For landfill measurements, Lagrangian approaches can be used to infer source locations where a ground team would detect emissions when on site, and the approach can also provide whole-site quantification estimates. Although most Lagrangian models are computationally intensive, some models that use pre-calculated footprint tables are appreciably more efficient and could complete estimates faster than Gaussian inversions. Costs and timelines would be as for MGPA. For an annual budget of $20,000 USD, a measurement visit could occur every 3 months.

Costs for some of the vendors and measurement methods could drop with different business models, for example, drones stationed onsite, or sensors mounted on landfill trucks. We expect these business models to emerge over the coming years.

5. Limitations of the Study

Due to permitting requirements and other factors, experimental limitations affected participation in the study and outcomes.

- Methane releases ranged from 10 to 50 minutes in most cases. This makes replication difficult for certain methodologies that might generally survey a site for 1-3 hours (e.g. MGPA). Due to favorable weather conditions, plume development was good, and vendors were able to submit estimates with high confidence in most cases.
- Depending on the methodology used, some vendors had an advantage due to the release points being visible.
- The safety permit obtained from TSSA did not allow personnel to access the release area when gas was being released. This affected methodologies that validate potential leak sources with a ground scan which in turn resulted in a high number of false positives being reported for the detection method.
- Satellite SISEA methodology could not be validated as the distributed and area-based releases were not large enough to detect despite several attempts with high rates (up near 300 kg/hr) under clear conditions.
- Weather conditions were mostly good during the 9-day period however a couple of days had rainfall and high winds which prevented vendors from taking good measurements.
- Intermittent leaks from the south side of the landfill were identified when vendor data were being analyzed. This increased the number of false positive counts in certain cases. To account for this issue, leak estimates made by methodologies in that area were not considered as part of the performance assessment. This improved methodologies' localization accuracies in certain cases.

6. Results and Discussion

The releases were conducted in early November, with an initial focus on quantification methodologies, followed by detection methodologies. While weather conditions for the study were generally good with consistent winds, various aerial vendors were unable to deploy on certain days due to strong winds or other conditions. Schedules were modified as needed, and Table 2 shows methodology, participation by day.

Table 2:Participating methodology schedule

Date of Release	Type of emission measurement	Participating Vendors
Nov 6, 2023	Quantification	A, B
Nov 7, 2023	Quantification	A, B, C, D, E, F, H
Nov 8, 2023	Quantification	A, B, C, D, E
Nov 9, 2023	Quantification	A, B, C, D, E, F, G, H
Nov 10, 2023	Quantification	A, B, E, F, G, H
Nov 11, 2023	Detection	A, G, L
Nov 12, 2023	Detection	A, C, H, L
Nov 13, 2023	Detection	L, M
Nov 14, 2023	Detection	H, M

Once measurements were complete, vendors were provided with a specified timeline to submit measurement estimates. Most measurement reports were received within the expected timeframes. Table 3 shows report submission dates for each participating vendor. Vendor A primarily participated during the quantification phase of the study; however, they were also taking measurements during the detection phase of the study mainly for R&D purposes.

Vendors were instructed to provide their initial estimates by December 12, 2023 and a resubmission of estimates by January 12, 2024. After vendors provided their initial estimates, onsite weather station data were shared and vendors had the opportunity to resubmit their estimates if they chose to do so.

Table 3: Vendor estimates submission schedule

Vendor	Methodology	Date of 1st submission	Date of 2nd submission
A	MGPA	Jan 18, 2024	Mar 13, 2024
B	MGPA	Dec 12, 2023	Mar 15, 2024
C	UPSEA	Dec 12, 2023	-
D	UPSEA	Dec 14, 2023	-
E	MTCEA	Dec 11, 2023	-
F	APSEA	Apr 04, 2024	-
G	LiDAR	Dec 11, 2023	Jan 10, 2024
H	SISEA	Nov 29, 2023	-
I	RPSEA	Dec 12, 2023	-
J	RPSEA	Dec 12, 2023	-
K	RPSEA	Dec 12, 2023	-
L	UCSEA	Nov 22, 2023	-
M	UCSEA	Dec 08, 2023	-
N	LEA	Apr 01, 2023	-

6.1. Release Conditions

Three Atmospheric Research Stations were set up based on their location relative to the emission sources to collect meteorological data as shown in Figure 7. The stations recorded weather data including Wind Speed (m/s), Wind Direction (degrees), Barometric Pressure (mbar), Relative Humidity (%RH), Air Temperature (Celsius), and Dew Point (Celsius), which was then sent to vendors. The FluxLab team checked the weather stations daily to ensure the equipment was working correctly.

This section summarizes atmospheric measurements and controlled release conditions at the Eastern Landfill Atmospheric Research Station (ELARS). The total height above ground for weather data measurements was calculated by summing elevation relative to sea level and the height of the tripod which equaled to 1.82 meters for ELARS. ELARS was on the eastern side of the landfill to use the easterly winds for downwind testing and was the closest station to the release buffer zone. The measurement period considered here runs from November 5, 2023, at 15:20 to November 14, 2023, at 17:29, with recordings every 2 seconds. Initial data preprocessing included formatting and synchronizing timestamps, checking time continuity, correcting wind direction, interpolating missing measurements, filtering wind data, and exporting and cleaning up the data.

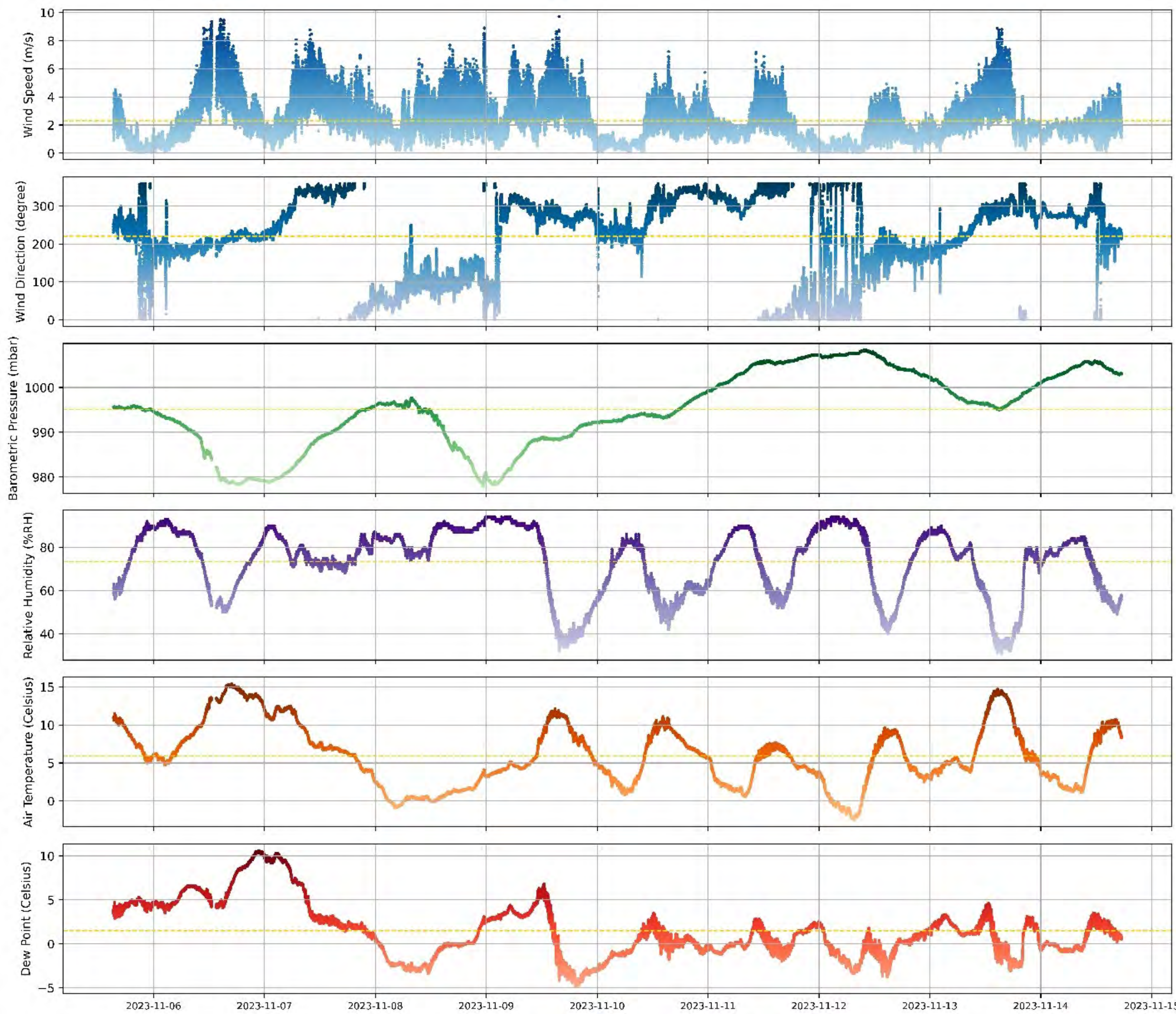

Figure 7:Time series data from the Eastern Landfill Atmospheric Research Station (ELARS) during the experimental period. From top to bottom: wind speed (m/s), wind direction (degrees), barometric pressure (mbar), relative humidity (%), air temperature (°C), and dew point (°C). The yellow line represents the mean of each series.

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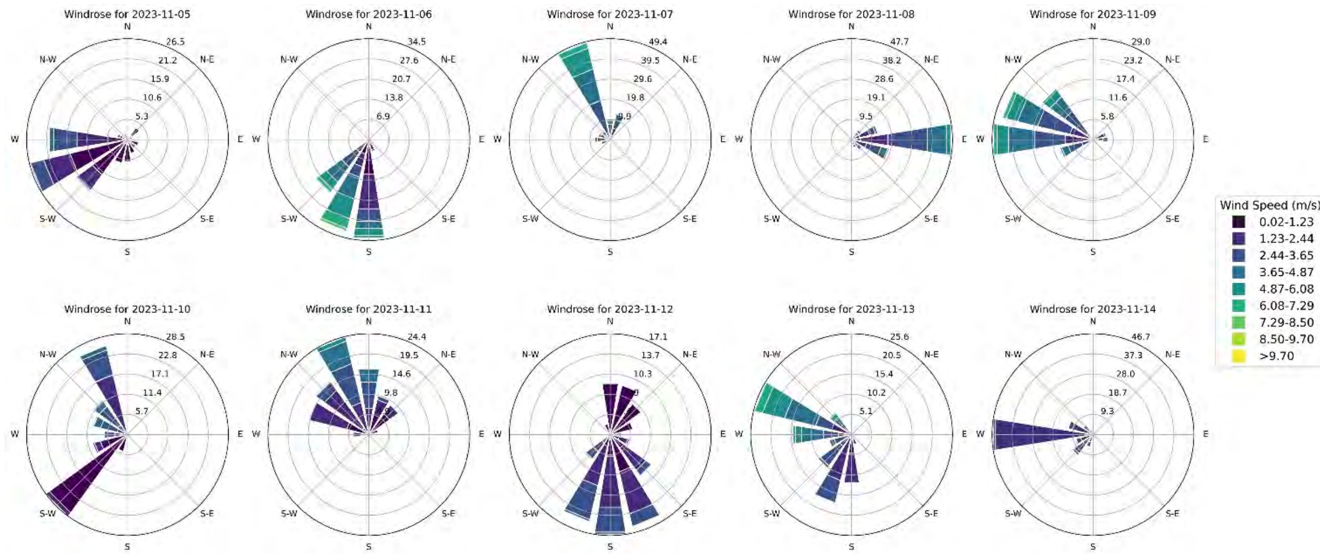

Figure 8:Daily wind roses from the Eastern Landfill Atmospheric Research Station (ELARS) during the experimental period.

The first days of the quantification experiments were mostly cloudy, but the detection test days had clearer, slightly windier conditions. Table 4 provides daily meteorological data, highlighting the most significant Pasquill Stability Classes for each day, with most days categorized as neutral (Class D) and some as slightly unstable (Class C) during the detection experiments. The cloudiness percentage time series (Figure 9) indicates that most days were partly cloudy and clear during the second round of detection experiments, increasing the likelihood of satellite measurement.

Table 4:Daily stability classes and sky conditions based on cloud cover observed during the experimental period.

Day	Statistically Significant Stability Class	Stability Level	Description
2023-11-06	D	Neutral	Calm and Partly Cloudy
2023-11-07	D	Neutral	Mostly Cloudy
2023-11-08	D	Neutral	Cloudy
2023-11-09	D	Neutral	Windy and Mostly Cloudy
2023-11-10	D	Neutral	Calm and Partly Cloudy
2023-11-11	C	Slightly Unstable	Windy and Partly Cloudy
2023-11-12	C	Slightly Unstable	Windy and Partly Cloudy
2023-11-13	C	Slightly Unstable	Windy and Clear
2023-11-14	D	Neutral	Calm and Partly Cloudy

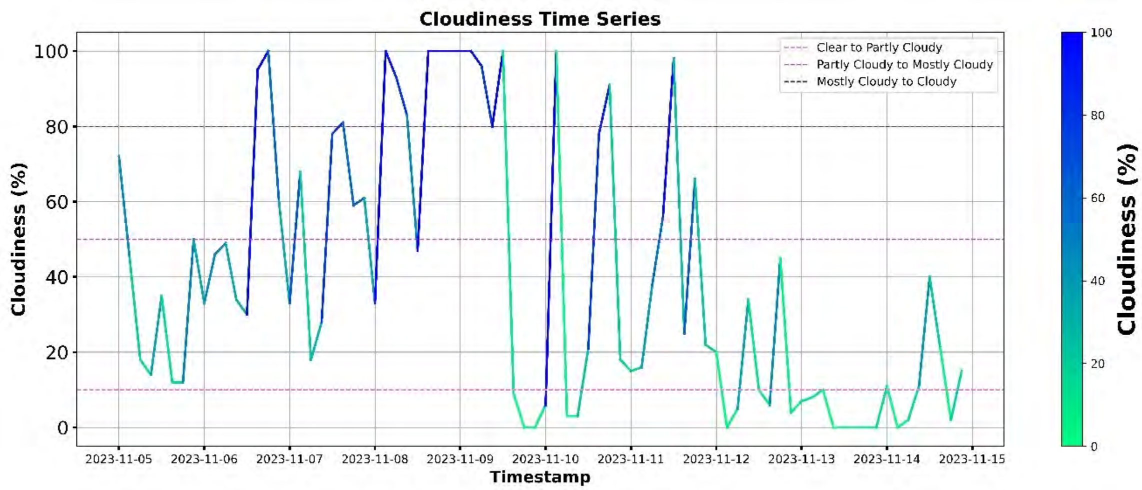

Figure 9: Daily cloudiness percentage of the study area during the experimental period, with thresholds indicating sky conditions.

6.2. Quantification Performance Assessments

6.2.1. Mobile and Drone Methodologies

Figure 10 shows performance results for MGPA, MTCEA, and UPSEA methodologies (vendors A, B, C, D & E). Vendors A and B use the same MGPA method and display a similar trend where both underestimate relative to the known release rates. As listed in Table 5, both vendors were measuring about 60% of known release rates (see Table 5), which is like a previous study in which MGPA measurements measured about 70% of known rates (Fredenslund et al., 2019). The gold-standard MTCEA measurements were very comparable to known release rates, with only minor downward bias. Vendor C uses the UAV UPSEA flux plane method, and the measurements were closer to the parity line than either of the three truck-based measurement vendors but with more spread in the measurements.

Compared to the UAV measurements, the mobile truck-based offsite methodologies (MTCEA and MGPA) offered flexibility and extended duty cycle across weather conditions and were able to report measurements on each day of the experiment, including when UAV and aerial and satellite vendors were unable to measure. Standard operating practices for these methodologies typically involve measuring emissions for several hours at a specific site. However, in this study release rates were changing on a 10 to 50-minute cycle, with very little time in between releases. Reports from vendors indicated that these conditions limited the performance of truck-based methodologies and that greater variance in measurements would be expected under the fast-changing conditions. Reported variance differed between vendors. Variance estimates from vendors A and B (MGPA) seemed unrealistically low, and few overlapped the line of best fit. Variance estimates from Vendor E, the MTCEA, were realistic and almost all overlapped the line of best fit. Vendor C using the UPSEA method also reported reasonable estimates of variance.

The performance of two UAV-based measuring systems, both using the UPSEA method, is shown in Figure 10, with varying results. Vendor C produced excellent estimates while deploying this method whereas estimates from vendor D were much less predictable. Although the regression line of best fit was statistically significant ($p<0.05$), we observed a substantial departure from the parity line. The levels of uncertainty for this methodology are being developed with data from this study, however, the vendor reported that an uncertainty of 5% was expected, which did not fully capture the observed uncertainty of their method in the field setting. The reason for the difference between vendors using the same method is not clear. Measurement conditions may have played a role given that the vendors performed their work at different times, but in both cases conditions were comparable. Both vendors carried high-resolution laser-based point sensors. We anticipate that differences arose primarily due to post-processing method differences and/or expertise. The UPSEA estimates from both vendors were less biased here than in previous controlled release studies where a 37% over-estimate bias was reported (Ravikumar et al., 2019) although, that study tested an earlier variant of the same methodology. Measurement estimates have improved in recent years, or else landfill controlled-release measurements are better suited to this methodology than smaller oil and gas point source releases.

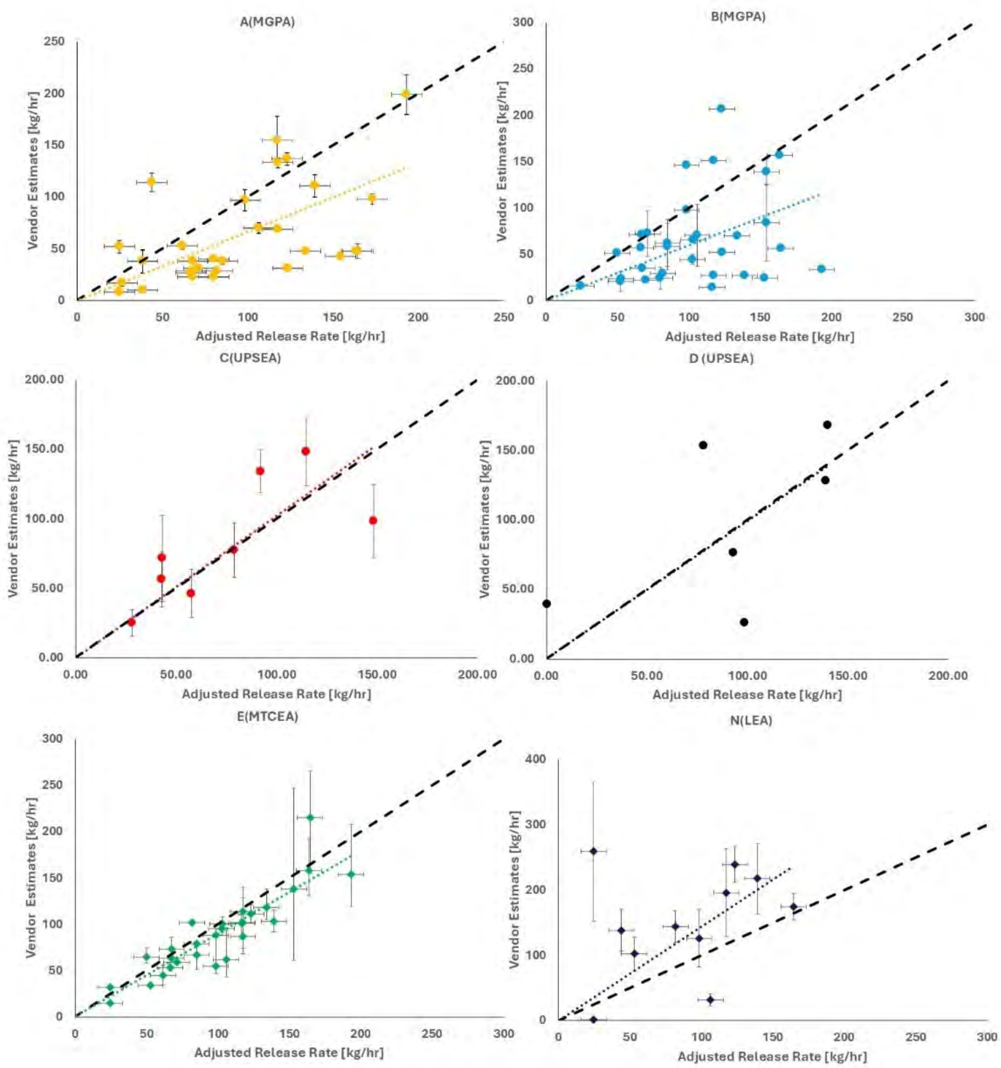

Figure 10: Parity charts of controlled release tests for truck and drone-based measurements. The dashed reference line shows the 1:1 parity relationship.

6.2.2. Aerial and Satellite Methodologies

Figure 11 shows parity charts for aerial and satellite-based systems. UPSEA methods had fewer submissions due to a combination of weather factors preventing measurements and some measurements not meeting internal quality standards. Vendor D for example had eight successful attempts to scan and submitted six estimates. Weather factors such as wind speed, time of day, and cloud coverage become strong contributing factors for technologies in this group. No detections were reported from the satellite-based vendor during the study. Contributing factors include release rates not meeting the minimum detection threshold, greater cloud coverage in November, and lower elevation of the sun which resulted in reduced signals for northern sites. Discussions with the vendor confirmed that the distributed nature of emissions, where emission rates were high >300 kg/hr but distributed from 10 release points, including 2 area-based release points) over 10 hectares, would have been challenging for the SISEA method to detect. For this release configuration, the Minimum Detection Limit (MDL) cannot be predicted but is at least 300 kg/hr. With the possibility of larger future releases at the same site, we can hopefully define MDLs and other performance metrics.

Vendor F, using the APSEA method, generally underestimated compared to the actual release rates. The measurements were not classified by the vendor as high quality since their internal meteorological conditions for measurements were not met. For this approach, meteorological conditions must allow for an emission plume to rise and disperse. Conditions under Pasquill stability class B are preferred, which consist of windspeed ranging from 2-6 m/s, good solar insolation, and limited cloud cover. During scheduled measurement times for vendor F, windspeeds of 7-11 m/s and near overcast conditions were observed. This resulted in the plume flowing beneath the minimum flying altitude and not rising quickly enough for measurement purposes. Despite the poor conditions, the measurements were linearly related to the actual release rates with a strong R^2 of 0.89. The slope of the line of best fit was 0.64 (Table 5), meaning that the vendor was typically reporting only 64% of the actual emission rate. This underestimation bias is comparable to recent estimates for point source releases reported by Abbadi et al. 2023, where the measurements were strongly correlated with actual rates with an R^2 of 0.92 (see Table 5), but where they were only reporting 52% of actual emission rates. Like MPGA, this method may be prone to under-estimation and may need bias correction. The variance estimates provided by the vendor were moderately successful in overlapping the line of best fit.

Vendor G used two forms of LiDAR quantification including aggregate emissions during detection scans (G-1 in Figure 11) and aerial mass balance screens (G-2 in Figure 11) to quantify methane releases. Both techniques were successful but tended to overestimate. As shown in Table 5, the mass balance estimates were overestimated to a greater degree. After considering onsite meteorological data, the estimates were improved and closer to actual emissions values in both cases with an overestimation of 43% and 17% in the case of detection scans and screens, respectively. LiDAR quantification did not quite match the performance accuracy that can be achieved in oil and gas settings as described by Conrad et al. (2023), but the same study also points to differing performance with dark skies and shadows that can create overestimated biases – and this was potentially a factor in our study where cloud-free days were rare and clouds were rolling quickly across the site in steady winds.

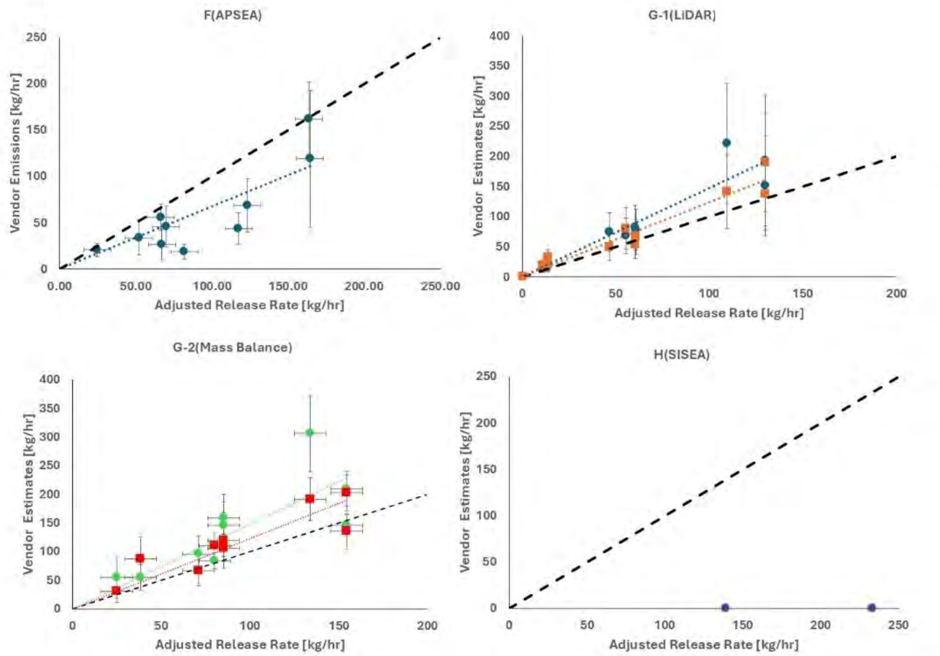

Figure 11: Parity charts of controlled release tests for aerial measurements. Plots G-1 (LiDAR) and G-2 (aerial mass balance) show two separate measurements by the vendor. Blue and green data points represent their 1st submission, and orange and red represent their revised submission after taking onsite weather data into account.

Figure 12 shows parity charts for continuous emission measurement systems (CEM) in the research and development group. Results from this study aim to further develop CEM sensors and algorithms specifically for landfill emission measurements. Estimates from vendor J provided the closest measurements to actual emission values compared to the other continuous sensors. Continuous sensors offer a low-maintenance method of measuring emissions compared to other vendors. Due to the low number of sensors available for the study, only a limited set of wind conditions were covered.

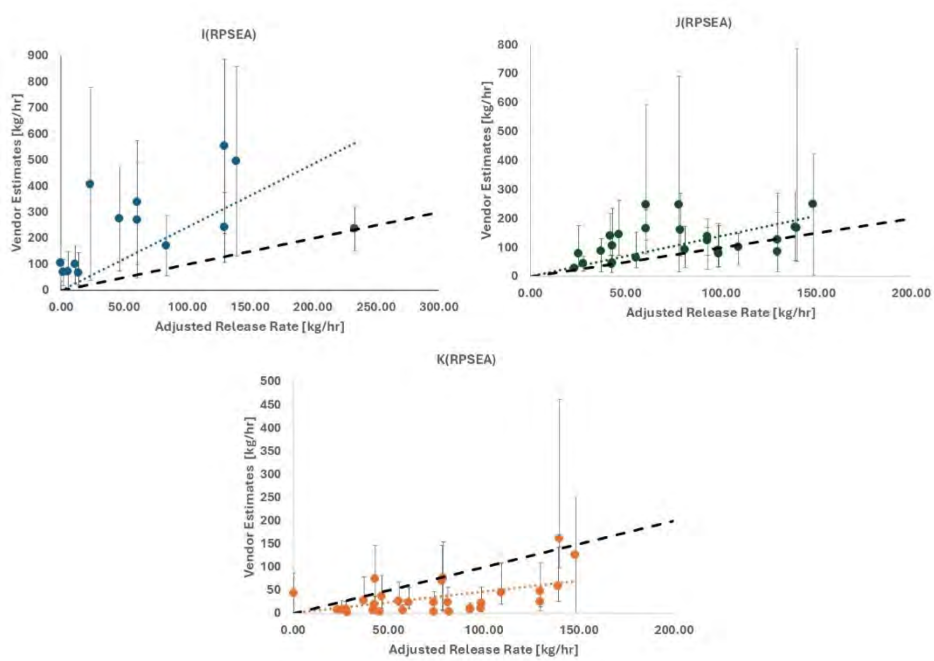

Figure 12:Parity charts of controlled release tests for CEM.

6.2.3. Statistical Properties for Mobile, UAV, Aerial and Satellite Methodologies

Table 5 lists linear regression values and average percent recovered for quantification methodologies. The bias factor along with the value of the slope provides information whether a methodology is under or over estimating emission rates. Value of slope less than one means a technology is underestimating whereas value of slope greater than one means that a technology is overestimating. Standard deviation percentage of residuals indicates the spread of emission rate values from the trendline. Deviation from true value percentage range provides the range of deviation for quantification estimates since standard deviation represents two-thirds of a normal distribution therefore outliers lie outside of the standard deviation range. A lower standard deviation percentage is desirable as it represents a lower uncertainty in emission estimates. and methodologies with higher number of estimates submitted indicates greater statistical power. When calculating residual and deviation from true values , scenarios with 0 kg/hr were omitted since values relative to the true value is undefined when the true release value is approximately 0 kg/hr.

Table 5: Linear regression values from Figures 10,11 and 12. *Calculated using values from the second submission.

Technology Identifier	Slope (1st sub)	R^2 (1st sub)	Slope (2nd sub)	R^2 (2nd sub)	Bias Factor 1/slope	StDev residuals %	Dev. from true value %	Number of estimates (n)
A	0.6644	0.7701	-	-	1.5051	47.61	1-160	30
B	0.5670	0.6739	-	-	1.7637	39.63	1-88	31
C	1.0211	0.9021	-	-	0.9793	34.71	2-66	8
D	0.9915	0.8211	-	-	1.0086	61.98	8-96	6
E	0.8972	0.9623	-	-	1.1146	20.49	3-44	28
F	0.6781	0.8915	-	-	1.4747	23.89	1-77	10
G-1	1.4735	0.9578	1.2423	0.9725	0.8050*	44.64*	6-128*	12
G-2	1.4847	0.9043	1.2265	0.9570	0.8153*	40.67*	7-130*	9
H	0.0000	-	-	-	-	-	-	0
I	2.4248	0.6354	-	-	0.4124	975.19	1-3597	14
J	1.3959	0.7885	-	-	0.7164	96.36	2-306	25
K	0.4615	0.5959	-	-	2.1668	39.10	5-96	30
N	1.4368	0.7333	-	-	0.6960	88.34	6-215	11

Quantification error percentage was calculated for each quantification estimate using equation 5. Error percentage was plotted against pressure and windspeed values from the eastern landfill atmospheric research station weather station. The resulting R^2 and p-values are listed in Table 6.

$$Quantification\ Error = \frac{|Measured\ Emission\ Rate - Controlled\ Release\ Rate|}{Controlled\ Release\ Rate} \times 100 \qquad \ldots(5)$$

Table 6: Pressure and wind dependencies on quantification error

Vendor Identifier	Pressure Adj R^2	Pressure p-value	Windspeed Adj R^2	Windspeed p-value
A	-0.0268	0.6087	0.0794	0.0756
B	0.1419	0.0210	0.2583	0.0021
C	-0.1497	0.7758	0.3929	0.0569
D	-0.2414	0.8758	-0.0734	0.4628
E	-0.0114	0.4121	-0.0285	0.6205
F	0.0679	0.2342	0.0362	0.2807
G-1	0.3562	0.0234	0.1027	0.1637
G-2	0.6814	0.0038	-0.1236	0.7394
H	-	-	-	-
I	-0.0042	0.3501	-0.0484	0.5392
J	0.2031	0.0137	0.0338	0.1880
K	-0.0312	0.7280	-0.0226	0.5545
N	-0.1207	0.8646	-0.0.0836	0.5953

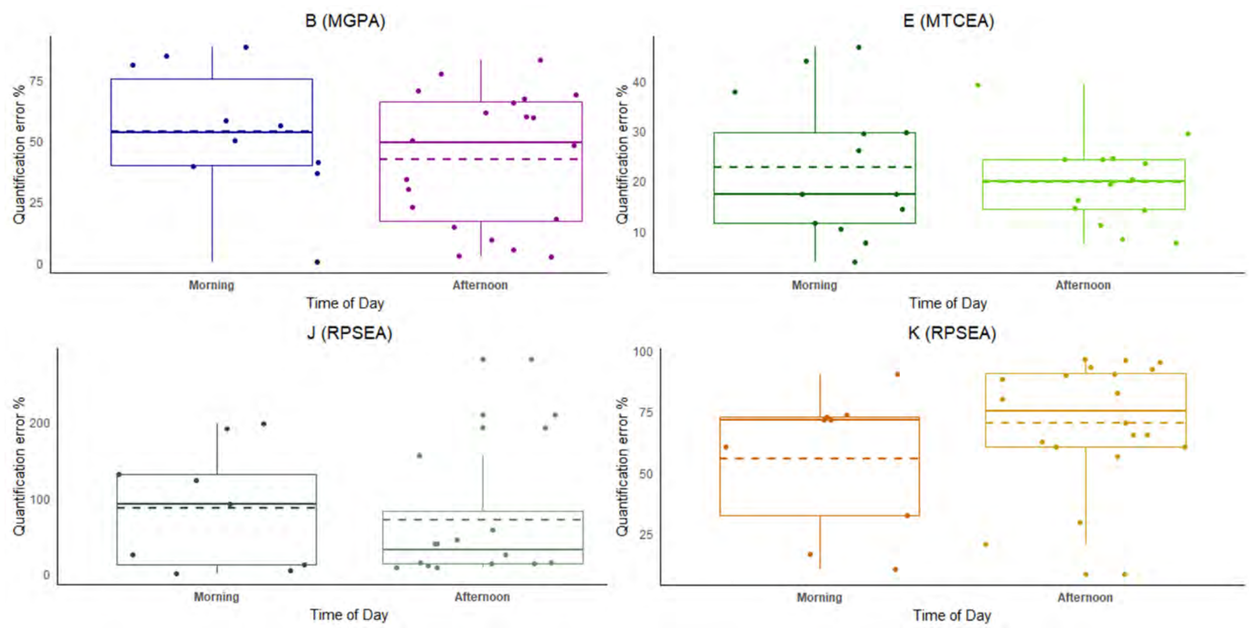

Figure 13: Boxplots of quantification accuracy of individual estimates based on time of day

Most methodologies did not show a significant dependence between error percentage and pressure and windspeed values. B (MGPA method) showed a correlation between quantification error percentage and pressure and wind speed. Vendor C's measurements (UPSEA method) showed an inverse correlation between windspeed and error percentage, with percent error decreasing as windspeed approaches 4-6 m/s. G-1 (LiDAR) displayed a significant positive correlation with barometric pressure and error %, and J (UCSEA) displayed an inverse correlation with barometric pressure.

Box plots showing quantification error during morning and afternoon measurements are shown in Figure 13 for methodologies that reported over 10 measurements during both periods of the day. The solid line indicates median quantification error percentage and dashed line indicates mean quantification error percentage for respective times of the day. Vendors B and E (MGPA and MTCEA respectively) displayed similar quantification error levels during both periods of the day, however greater variations in afternoon measurements can be observed for B (MGPA) whereas vendor E (MTCEA) displays greater variation for morning measurements. Continuous sensor vendor J(RPSEA) reported higher quantification error percentages in the morning compared to afternoon measurements and K(RPSEA) reported similar error percentages for both morning and afternoon measurements.

6.3. Discussion on Performance

Both MGPA methods (A and B) use the same methodology. The point-source Gaussian inversion method relies on various model parameters, including stability class and wind speed and direction. In a sensitivity analysis of the same technique conducted by Ars et al. (2017), it was found that the stability class contributes the most uncertainty followed by wind direction, wind speed, and source location. The overall uncertainty was estimated to be around 75%. With better constraints on atmospheric conditions, the uncertainty was reduced to 55%. In a landfill study that used the same methodology, Kumar et al. (2024) reported a level of uncertainty of approximately 30% on emission estimates from distant roads. Truck-based emission rate uncertainty was also determined to be 63% in a controlled release study described in O'Connell et al. (2019; SI). However, this last study used the Gaussian plume model differently. The measurements are likely leading to underestimated rates because the whole landfill emission might not have been fully sampled from ground-level transects on public roads. Moreover, the model does not account for plume lofting that arises from the elevated landfill surface temperature. The bias of 1.58 and 1.76 for technology A and B respectively, fit into the uncertainty range from Ars et al. (2017).

During the study, MGPA methodologies were limited by the compressed timeline. Normally MGPA requires more replication. During the study, experimental conditions and release rates were changing as often as every 30 minutes, leaving only 20 minutes for measurement. This left time for only 2 full transect passes on average per submitted measurement estimate. Numerous submitted estimates were based on a single transect pass because the plume was still increasing or subsiding during one of the passes. Normal practice for the vendor is to incorporate 6-15 full transect passes into a single measurement estimate, which might represent 2 hours of transect driving. Although various researchers over time have recommended the number of replicates required for robust Gaussian measurements, the normal recommendation is 3 at the very minimum, and ideally 10 or more. By including more replicates, the variance and volatility of individual transect estimates should reduce. Using the data submitted by vendor A, we averaged successive groups of 6 measurements from low rates to high, to simulate the effect of including 12 transects (6 measurements with 2 transects each) in a single measurement estimate (Figure 14:). As expected, the groupings decreased measurement variance substantially and more than halved average residuals (departures from the best-fit line) to 13 kg/hr across a range of 25-200 kg/hr. This indicates that under normal work practice, we might expect less variance from MGPA. Replication will help decrease variance / increase precision. Bias corrections can improve accuracy, when we multiply measurement estimates by a repeating under-estimation factor.

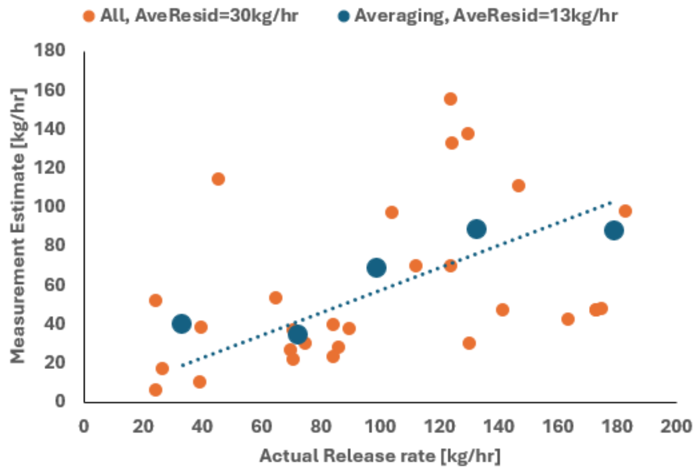

Figure 14: Simulated replicate parity chart for MGPA

Vendor E using the MTCEA method stands out with measurements closer to the parity line than other truck-based solutions, and other methodologies. We found no significant correlation between error percentage and pressure and windspeed values. Previous studies, like Foster-Witting et al. (2015) also note insensitivity of the MTCEA approach to atmospheric changes.

Consistent with a review of advanced UAS leak detection and quantification methods by Hollenbeck et al. (2021), the UPSEA method offered accurate and precise emission rate estimates but proved sensitive to atmospheric stability. In controlled release testing of flux screens derived from miniature Mid-Wave Infrared TDLAS data collected aboard a quadcopter (Corbett and Smith, 2022), the linear fit between the metered and calculated rates had an R^2 value of 0.8236, which is comparable to those of vendors C and D herein (Adj. R^2=0.9201 and Adj. R^2=0.8211, respectively). Furthermore, Corbett and Smith (2022) reported a TDLAS flux plane error range of 1.19-88.36% and a negative correlation between wind speed and absolute error. In independent single-blind controlled release testing of mobile leak detection and quantification technologies by Ravikumar et al. (2019), UAS-based TDLAS flux screens yielded exclusively true positives and true negatives, demonstrating a lower detection limit comparable to OGI and an order-of-magnitude quantification accuracy comparable to Picarro. There are fewer published controlled release studies describing Mid-IR LDS UAS flux planes, though a preprint study by Dooley et al. (2024) found a strong correlation (R^2=0.99997) between actual and estimated emissions across a wide range of release rates (0.04-1500 kg/hr) as well as systematic underestimation by their approach.

A few studies have measured methane emission fluxes from landfills using the APSEA mass balance technique (e.g., Obiminda et al. 2017; Allen et al. 2019; Gasbarra et al. 2019; Yong et al. 2024), but to our knowledge, this technology was never validated and compared in a blinded controlled methane release test in a landfill context. One controlled release test over a managed agricultural field showed that, under favorable measurement conditions, emissions from the point release source could be quantified by aerial mass balance (UAVs) with an uncertainty of 30 % (Morales et al.

2022; https://amt.copernicus.org/articles/15/2177/2022/). The authors also stated that emission rate estimates were on average slightly overestimated under optimal conditions, but lower average accuracy was observed when measurements were performed under less favorable wind conditions. In another controlled released study, also with a methane point source, Abbadi et al. (2023) showed, despite a low number of measurements, that the aerial mass balance technology was able to quantify release above 10 kg (CH_4) hr^{-1}.

Similarly, recent technologies such as satellite-based SISEA measurements using emission image capture have never been tested for detection and quantification during single-blind controlled methane release tests in a landfill context. The method has shown the ability to detect methane at landfills but with unknown accuracy. A recent study (Sherwin et al. 2023) tested several satellite methodologies with a trailer of liquefied natural gas acting as a methane point source. The authors reported that for all detected emissions from this point source, mean estimates for all satellite-team combinations were between – 68 and 110% of the release rate. It is difficult to understand how these results would translate to a landfill context where more non-point source emissions are present.

Continuous sensors show substantial promise from a cost and variability standpoint. But they are in early stages of development. A controlled release study for oil and gas detection by Chen et al. (2023) focused on detecting and quantifying methane emissions using Continuous Methane Monitoring Technologies, and while some methodologies showed good accuracy, others showed high rates of false positives. Unfortunately, the context for these oil and gas sites is very different from that of a landfill where topographic change is significant, numerous emission points are active at once, and the scale is over 100x larger. Landfill-specific controlled release testing and development must be carried out to bring these systems toward maturity for the waste sector. Given these limitations, one RPSEA methodology did perform well. Perhaps more impressively, the technology producer did not know they were participating, since a third party brought their sensor to the experiment. The technology producer may have preferred a different placement, but the results are promising. Error bars may have been overestimated.

Lagrangian footprint model has been widely used for natural sources, but using the model for emissions from anthropogenic sources is quite limited. Various studies have shown the Lagrangian footprint model's effectiveness in assessing methane emissions. Gerbig et al. (2006) used the COMET model to simulate greenhouse gas concentrations in the Netherlands and Ireland. Pisso et al. (2021) assessed methane emissions from offshore oil platforms in the Norwegian Sea, while Brunner et al. (2014) focused on methane emissions in Europe. Among these studies, none of them were focused on emissions from landfills. In this study, LEA participated as an R&D methodology, but its performance was promising given that this was a first-use trial, and the optimal work practice strongly diverged from the preference of having several hours, rather than several tens of minutes, to collect data.

Overall, the quantification results from most methodologies were promising. Table 7 lists key findings for quantification methodologies. They could all be useful, especially with replication. We observed high variability between vendors applying the RPSEA and UPSEA methods, which may indicate that standardization of operating procedures is needed. We observed very similar results between vendors applying MGPA. For MGPA, questions remain about variance under normal work practice, and these should be tested during subsequent rounds of controlled-release testing. Ultimately, there is no best vendor or methodology for quantification measurements, because the costs of these measurements may limit use to once per year. Frequent measurements can appreciably lift the value of inherently lower precision methods, and help capture temporal variation across daily, seasonal, and annual cycles. Bias corrections should potentially be applied to methodologies where we see a repeating trend of under- or over-estimation, as in this study and others.

Table 7: Summary of key findings for quantification methodologies

Technology Identifier	Method	R&D ?	Key Findings
A	MGPA	No	Reported approximately 66% of known release rates with a tendency to underestimate emission rates. Method is usually deployed over several hours and short release windows affected quantification performance. Method offered flexibility and extended duty cycle across weather conditions and was able to report measurements on each day of the experiment.
B	MGPA	No	Reported approximately 56% of known release rates with a tendency to underestimate emission rates. Method is usually deployed over several hours and short release windows affected quantification performance. Method offered flexibility and extended duty cycle across weather conditions and was able to report measurements on each day of the experiment.
C	UPSEA	No	Quantification estimates were very good with few outliers. Methodology is affected by weather conditions where measurements are not possible during rain and windspeed above 12 m/s.
D	UPSEA	No	Estimates varied greatly from true release rates with bias being less predictable. Methodology is affected by weather conditions where measurements are not possible during precipitation and windspeed above 17 m/s.
E	MTCEA	No	Quantification estimates were consistently close to true release rates with a slight downward bias. Method requires setup of tracer gas and frequent monitoring of its consumption levels. Method offered flexibility and extended duty cycle across weather conditions and was able to report measurements on each day of the experiment.
F	APSEA	No	Underestimated measurements consistently and vendor reported that estimates were not classified as high quality due to internal meteorological for measurements were not met. Requires 2-6 m/s windspeed, solar insolation and not a lot of cloud cover for good measurements.
G	LiDAR	No	Both LiDAR and mass balance methods were accurate and had a tendency to overestimate emission rates. Increase in quantification estimates were observed after onsite weather data were considered.

			Requires good visual flight rules conditions for flying aircraft. Ideal wind speed ranges from 3- 6 m/s.
H	SISEA	No	Emissions were not detected for quantification or localization purposes. Minimum detection limit expected to be at least 300 kg/hr. Cloud cover over the site and/or wind speed exceeding 10 m/s prevents emission measurement.
I	RPSEA	Yes	Overestimated emissions in most cases. Low maintenance method of quantifying estimates, due to low number of sensors only a limited set of wind conditions were covered.
J	RPSEA	Yes	Provided the closest measurements to actual emission values compared to other fixed sensors. Due to low number of sensors only a limited set of wind conditions were covered.
K	RPSEA	Yes	Underestimated emission in most cases. Due to low number of sensors only a limited set of wind conditions were covered.
N	LEA	Yes	Overestimated emissions in most cases. Lagrangian models are usually applied to tower-based systems however in this instance it was adapted to a mobile setting.

6.3.1. Detection Performance Assessments

Table 8 lists values for detection performance analysis. False positives are detections reported by methodologies that cannot be attributed to a controlled release and false positive fractions is the number of false positive detections relative to total number of detections. A false positive fraction of 0 desirable. True negative readings are instances when a methodology was able to correctly predict an inactive release point as a non- emitting source. True negative rate is the total number of true negative readings relative to the summation of true negative readings and false positive readings. A true negative value of 1 is desirable. Localization accuracy is the number of true positive detections relative so the summation of false positive readings and true positive readings. Localization accuracy of 1 is desirable.

Table 8: List of primary detection metrics

Method Identifier	False Positive Fraction	False Negative Fraction	True Negative Rate	Localization Accuracy	Survey Time (mins)
C	1	1	0.70	0	40
G	0	0	1	1	20
H	-	-	-	-	0.3
L	0.83	0.63	0.28	0.17	50
M	0.79	0.50	0.52	0.21	60
N	0.79	0.85	0.54	0.1-0.5	15

6.3.2. Analysis of Primary Detection Metrics

Table 7 lists the values obtained from equations 2 – 5 along with survey times for detection methodologies except for vendor N, which is not a leak detection technology per se but a screening that can be applied offsite. Lagrangian emission assessment is applied in a mobile setting for detection purposes in this study therefore the expectation for its assessment is different compared to other vendors. For all vendors, except N, a false positive and negative fraction closer to zero is desirable since it indicates the methodology's ability to correctly detect emissions. A true negative rate of one is desirable since it indicates the methodology's ability to classify inactive release points as a non-releasing source and it also indicates a lower false positive count. The Lagrangian model is usually not used for localization purposes, errors introduced from measurement and using the model affects resulting leak estimates. Vendor G (LiDAR) performed very well detecting active emissions 100 percent of the time without false positive readings. Vendor C provided accurate quantification estimates; however, was unable detect leaks correctly in all measurement attempts. Vendors L and M used the same drone-mounted TDLAS column sensor, and the results were similar, with a high fraction of false positives reported. Although both vendors were using identical sensors, vendor M was slightly more sensitive to leaks and we suspect that differences can be attributed to subtle differences in the work practice. It should be noted that both were unable to fully deploy their methodology, since a ground scan is usually performed to validate potential leak sources identified by the drone-mounted sensor. Vendor N was deployed from 1 km to 1.9 km from the landfill center point and was able to discern sources within ~100 m, indicating an uncertainty rate of about 15%. Since the study area could only be accessed when gas was not being released, vendors could not validate potential leak spots, which likely contributed to a much higher percentage of reported false positives. In their normal work practice vendors would manually verify using EPA21. Figure 15 illustrates the total number of true positives, false positives, and false negatives for vendors G, L, and M.

Figure 15: Classification of detection categories

6.3.3. Analysis of Probability of Detection Plots

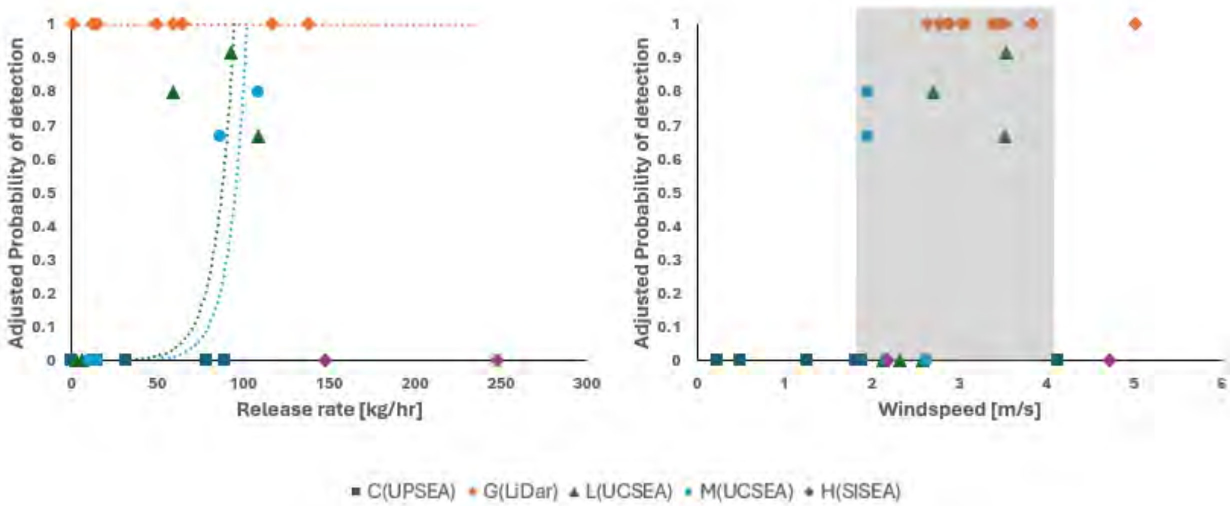

Figure 16: Adjusted Probability of Detection Curves against release rate (left) and wind speed (right)

The probability of detection curve was plotted against release rates and windspeed in Figure 16. LiDAR was very sensitive to emissions as low as 1 kg/hr. The LiDAR methodology's sensitivity is consistent with the detection analysis conducted by Bell et al. (2022) where a minimum detection limit of 0.25 (kg/hr)/(m/s) was observed at an altitude of 500 ft AGL, with 90% probability of detection. For UCSEA, the minimum detection limit was 95.34 kg/hr (vendor L) and 101.88 (vendor M), at an altitude of 20 m AGL, with 90% probability of detection. The locations of releases were a significant factor for UCSEA systems. True positive measurements were made more frequently on flat surfaces compared to slopes. When comparing the probability of detection with wind speed, most true positive detections were made between 2 and 4 m/s (shown in the shaded region in the right-hand side plot in Figure 16).

6.3.4. Detection Technology Performance Analysis

Comparison of UCSEA against previously published works is not possible since there are very few peer-reviewed papers published on the topic, and none using the sensor employed by vendors L and M. One paper by Natalie Pekney's group at NETL that describes the use of an ICI TDLAS column sensor mounted on a UAV flying the length of pipelines. A similar study by Li et al. discovered a minimum detectable release rate of 4 kg/hr in pipeline surveys with the ICI TDLAS-equipped UAV (Li, 2020). This compares favorably to the release rate-dependent probability of detection of technologies L and M, which was more than 10 times as high. There are some differences between the resolution and range specification sheets of the sensors, 1 ppm*m in Li et al. vs 5 ppm*m for vendors L and M, and respectively, 50 m vs 25 m. The sensors used in our study appear to have lower resolution by a factor of 5 and are being piloted nearer the edge of the measurement range, which may explain the differences between the results we observed, and the greater sensitivity observed by Li et al. (2020).

The only other similar controlled release experiment to UCSEA was conducted by Arain et al. (2020) using a mobile ground robot with a Sewerin TDLAS sensor to measure path-integrated methane concentrations, much like USCEA. The Sewerin sensor has a resolution and range that is virtually identical to the sensor used by vendors L and M. Arain and co-authors found a probability of detection of 56% and a 40% false positive rate. Although release rates were not disclosed, the test was conducted indoors, without wind which would have maximized the likelihood of detection. The probability of detection for vendors L and M was even lower in an outdoor environment where wind would quickly dilute concentrations. Vendors L and M returned appreciably larger false positive rates, but comparable false negative rates.

Overall, methodologies' performance in the detection component of the study was highly variable. Table 9 lists key findings for detection methodologies. One vendor (G-LiDAR) scored perfect marks in leak detection trials with no false positives and even made us aware of a malfunctioning flow controller bleeding at under 1 kg/hr. Other methodologies, at rates exceeding 90 kg/hr, could detect fewer than 20% of the releases. The difference in sensitivities between methodologies was roughly 100x in leak detection.

There is pressure to replace walking surveys with more repeatable methods that will reduce injuries incurred by walking on rough terrain. UAV surveys, and especially UCSEA, seem to fit the bill. However, there is substantial variation in the resolution of available TDLAS column sensors on the market, with some advertising as low as 1 ppm*m resolution to 100 ppm*m resolution. Even though it might not be intentional, the evolution of UCSEA, OTM51, and other UAV-based technologies mimic the sensitivity and attributes of EPA21 surface emissions monitoring walking surveys. However, EPA21 sensitivity is not well established, and until it is, it will be unclear whether these UCSEA methodologies deliver equivalent results. If industry and regulators agreed on the minimum leak rate that should be detectable in surveys sensors, work practice could be adjusted to meet rate-based outcomes, which are easy to test experimentally.

The LiDAR methodology performance was impressive, and potentially more sensitive than any landfill operator needs. While UCSEA methodologies had lower performance, they are less expensive to deploy. Based on previously published research, windspeed-specific thresholds, and work practice UCSEA has potential to improve its sensitivity. Lower-precision technology is not necessarily a poor choice for landfills, it just may need to be applied more frequently. The new US EPA OOOO/NSPS standards for oil and gas sites put forward a resolution-based frequency, where less sensitive methods must be deployed more often so they can catch larger emitters earlier – to reduce an equivalent amount of methane as an infrequently deployed higher resolution method. A similar approach could be developed for rate-based landfill leak detection sensitivity, with a move away from concentration thresholds.

Table 9:Summary of key findings for localization methodologies

Technology Identifier	Method	R&D ?	Key Findings
C	UPSEA	Yes	Methodology did not register any true positive emission estimates during the localization phase of the study.
G	LiDAR	No	Performed very well detecting active emissions 100 percent of the time without false positive readings.
H	SISEA	No	Emissions were not detected for quantification or localization purposes. Minimum detection limit expected to be at least 300 kg/hr. Cloud cover over the site and/or wind speed exceeding 10 m/s prevents emission measurement.
L	UCSEA	No	Reported high number of false positive estimates with limited visibility when measuring active emission points on slopes. Minimum detection limit at 90 % probability of detection was determined to be 95.34 kg/hr.
M	UCSEA	No	Performed slightly better than compared to other methods using TDLAS sensors. Also had high number of false positives and a minimum detection limit at 90% probability of detection of 101.88 kg/hr.
N	LEA	Yes	Reported mostly false positive estimates. Model is usually used for quantification purposes therefore is not suited for providing localization estimates.

7. Future Work

This study contributes to understandings of how different technologies operate and perform in a landfill setting, and several topics warrant further exploration. One aspect that must be further explored is the validation of satellite-based methane measurements. Satellite-based methodologies are gaining increased attention due to their expanding abilities. In future studies, a setup with the ability to release over 300 kg/hr during months with low cloud coverage will aid in validating satellite-based measurements.

Continuous fixed methane sensors offer a low-maintenance option for monitoring landfill methane emissions. During this study, fixed sensor coverage was inadequate and analysis of measurement quality over a variety of wind profiles could not be assessed. Longer release times, along with full site coverage, will allow a more accurate assessment for fixed sensors.

Certain vendors in this study were not able to fully deploy their methodologies due to permitting restrictions. In future studies vendors will be able to provide better measurement estimates if they can access the active release area, and if drone-based methodologies have a better line of sight. Having access to the release area will also allow detailed surface emission reports (SEM) to be developed for the study. Prioritizing methodologies such as OTM 51 and UCSEA will help develop standard work practices and a shift away from walking-based surveys.

Studying the rate of methane emissions during day and night cycles is another topic of interest. The ratio of maximum to minimum flux during a day-night cycle can vary between 1.81 to 23.20 as mentioned in Delkash et al. (2022). Studying the variability between day and nighttime measurements among methodologies will further advance measurement practices.

Our 2023 study utilized a temporary, above-ground pipeline setup which was later dismantled. To prevent waste and allow vendors to test new technologies, a permanent or long-term, controlled release setup buried underground can be assembled. This will allow frequent validation and research and development opportunities.

8. Summary Conclusions

A temporary controlled release setup was assembled and used to test 16 combinations of vendors and methodologies for quantification and detection performance during 71 experiments. Quantification methods performed well during the study. Truck-based systems using the Gaussian model tend to underestimate and the tracer correlation method was the most accurate among the truck-based methodologies. Using onsite weather data improved accuracy of LiDAR and should be an important consideration for vendors.

Detection methods and vendor performance varied greatly. LiDAR was very effective in localizing leaks and detecting emissions as low as 1 kg/hr. TDLAS systems, at a rate of around 80%, provided a high number of false positive leak estimates. This occurred with both vendors, who used the same technology.

Key takeaways from the study are listed below:

- MTCEA provided good quantification estimates while being flexible to operate in various weather conditions. UPSEA provided accurate quantification estimates as well , however the methodology requires good weather conditions to operate (no precipitation, windspeed below 12 m/s).
- Collecting onsite weather data is recommended as it has shown to improve quantification estimates
- LiDAR was able to detect all active emitting points including flowrates as low as 1 kg/hr.
- UCSEA reported high number of false positives (False positive fraction > 0.79) with limited visibility when measuring active emission points on slopes.
- RPSEA showed promising results; however, require further validation in a landfill setting to ensure its accuracy.

Table 10 summarizes key metrics for participating methodologies.

Table 10: Key performance metrics for all vendors

Technology Identifier	Method	Dev. from true value %	St Dev of Residuals %	Localization accuracy
A	MGPA	1-160	47.61	-
B	MGPA	1-88	39.63	-
C	UPSEA	2-66	34.71	-
D	UPSEA	8-96	61.98	-
E	MTCEA	3-44	20.49	-
F	APSEA	1-77	23.89	-
G-1	LiDAR	6-128	44.64	1
G-2	Mass Balance	7-130	40.67	-
H	SISEA	-	-	-
I	RPSEA	1-3597	975.19	-
J	RPSEA	2-306	96.36	-
K	RPSEA	5-96	39.10	-
L	UCSEA	-	-	0.17
M	UCSEA	-	-	0.21
N	LEA	6-215	88.34	0.1-0.5

This study will allow operators and regulators to make more informed decisions about landfill emission measurement techniques. Furthermore, vendors will be able to use data created during this study to further develop their methodologies and improve their services for the waste management sector, to reduce methane.

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A: Summary Data Table

Table A-1: Flowmeter data and uncertainty for all experiments. Flow rates are in kg/hr and experiment times are in Eastern time format.

Exp#	Q_A	Q_B	Q_C	Q_D1	Q_D2	Q_D3	Q_E	Q_F	Q_K4	Q_K5	Flowmeter Total	Site Total	Time Start	Time End	U_A	U_B	U_C	Q_D1	Q_D2	Q_D3	Q_E	Q_F	Q_K4	Q_K5	RSS	%U
1	2.78	4.64	2.78	0.00	0.00	6.50	0.93	1.86	0.00	0.00	19.49	43.93	2023-11-06T10:00:12.840	2023-11-06T10:40:14.723	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0	0.000108	0.0108
2	3.71	4.64	5.57	4.64	0.00	0.00	3.70	1.86	0.00	4.38	28.50	52.94	2023-11-06T11:40:28.179	2023-11-06T12:20:57.916	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000126	0.0126
3	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.31	0.00	0.00	0.30	24.74	2023-11-06T12:40:15.593	2023-11-06T13:30:35.568	0	0	0.006	0.006	0	0	0.006	0.006	0.006	0	0.00009	0.009
4	5.57	14.85	17.45	0.00	0.93	0.00	2.78	22.27	18.19	0.00	82.03	106.47	2023-11-06T13:53:12.998	2023-11-06T14:43:28.377	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
5	14.85	0.00	12.99	0.00	16.71	0.00	17.63	10.21	0.00	1.65	74.04	98.48	2023-11-06T15:41:01.218	2023-11-06T16:30:51.252	0.006	0	0.006	0	0.006	0	0.006	0.006	0	0.006	0.000108	0.0108
6	2.77	1.85	0.00	0.00	0.00	2.78	9.26	10.21	1.57	0.00	28.44	52.88	2023-11-07T08:16:09.775	2023-11-07T09:06:23.783	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000126	0.0126
7	0.00	0.00	0.00	0.00	0.00	0.00	2.80	22.28	0.45	0.00	25.53	49.97	2023-11-07T09:40:24.157	2023-11-07T10:30:36.410	0	0	0	0	0	0	0.006	0.006	0.006	0	0.000054	0.0054
8	-0.01	-0.01	0.00	0.00	0.00	0.00	-0.01	0.25	0.02	0.00	0.25	24.68	2023-11-07T11:11:52.591	2023-11-07T12:10:46.914	0	0	0.006	0	0	0	0	0.006	0.006	0	0.000054	0.0054
9	5.55	13.87	2.78	3.70	0.00	0.00	21.33	50.11	0.00	1.54	98.87	123.31	2023-11-07T12:30:27.287	2023-11-07T13:20:41.804	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000126	0.0126
10	5.54	8.32	11.11	10.19	0.00	0.00	41.71	58.47	0.00	4.64	139.98	164.42	2023-11-07T13:40:15.331	2023-11-07T14:30:28.162	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000126	0.0126
11	0.10	1.08	2.06	0.00	2.95	0.00	19.92	17.74	1.66	0.00	45.50	69.94	2023-11-07T14:45:05.445	2023-11-07T15:18:11.408	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
12	3.71	4.64	4.64	0.00	5.57	0.00	13.91	21.35	3.71	0.00	57.53	81.97	2023-11-07T15:26:14.286	2023-11-07T15:56:16.816	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
13	0.00	-0.01	0.00	0.00	0.00	0.00	45.78	46.16	0.04	0.00	91.96	116.40	2023-11-08T08:13:40.905	2023-11-08T09:04:52.638	0.006	0	0	0	0	0	0.006	0.006	0.006	0	0.000072	0.0072
14	11.14	3.71	0.93	5.61	0.00	0.00	46.94	44.55	0.00	1.87	114.74	139.18	2023-11-08T09:17:03.823	2023-11-08T10:07:27.289	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000126	0.0126
15	6.50	11.14	0.93	0.00	0.00	9.28	47.13	51.04	2.78	0.00	128.80	153.24	2023-11-08T10:17:27.030	2023-11-08T11:07:27.828	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000126	0.0126
16	18.56	18.56	18.56	0.00	0.00	18.55	-0.15	0.32	18.56	0.00	92.97	117.41	2023-11-08T11:50:14.469	2023-11-08T12:40:19.682	0.006	0.006	0.006	0	0	0.006	0	0.006	0.006	0	0.000108	0.0108
17	12.99	18.56	16.71	0.00	18.37	0.00	34.32	52.87	14.85	0.00	168.67	193.11	2023-11-08T12:55:33.269	2023-11-08T13:45:37.403	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
18	0.00	-0.01	0.00	0.00	0.00	0.00	47.75	29.70	0.68	0.00	78.12	102.56	2023-11-09T08:00:22.677	2023-11-09T08:45:00.432	0	0	0.006	0	0	0	0.006	0.006	0.006	0	0.000072	0.0072
19	0.00	-0.01	0.00	0.00	0.00	0.00	48.43	29.70	0.69	0.00	78.80	103.24	2023-11-09T08:45:02.120	2023-11-09T09:20:31.461	0	0	0.006	0.006	0	0	0.006	0.006	0.006	0	0.00009	0.009
20	-0.01	0.93	1.86	2.78	0.00	0.00	19.49	16.71	1.47	0.00	43.22	67.66	2023-11-09T09:30:17.935	2023-11-09T10:15:03.745	0	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000108	0.0108
21	-0.01	0.93	1.86	2.78	0.00	0.00	19.49	16.70	1.43	0.00	43.18	67.62	2023-11-09T10:15:05.662	2023-11-09T10:45:20.562	0	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000108	0.0108
22	-0.01	0.00	0.00	0.00	0.00	0.00	-0.04	0.38	0.03	0.00	0.36	24.80	2023-11-09T11:00:02.155	2023-11-09T11:30:00.364	0	0	0.006	0.006	0	0	0	0.006	0.006	0	0.000072	0.0072
23	-0.01	18.56	9.28	0.00	16.71	0.00	23.20	23.20	0.00	18.56	109.50	133.94	2023-11-09T11:35:15.208	2023-11-09T12:05:16.021	0	0.006	0.006	0	0.006	0	0.006	0.006	0	0.006	0.000108	0.0108
24	-0.01	0.00	0.00	0.00	0.00	0.00	23.18	23.20	0.35	0.00	46.72	71.16	2023-11-09T12:09:59.947	2023-11-09T12:40:08.841	0	0	0.006	0.006	0	0	0.006	0.006	0.006	0	0.00009	0.009
25	18.56	18.56	9.28	4.64	0.00	0.00	-0.01	0.32	0.00	9.28	60.63	85.07	2023-11-09T12:45:14.837	2023-11-09T13:15:21.213	0.006	0.006	0.006	0.006	0	0	0	0.006	0	0.006	0.000108	0.0108
26	18.56	18.56	9.28	4.64	0.00	0.00	0.06	0.30	0.00	9.27	60.68	85.12	2023-11-09T13:20:08.104	2023-11-09T13:50:16.090	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000126	0.0126
27	5.57	8.35	11.14	0.00	0.00	9.28	41.77	58.44	4.64	0.00	139.19	163.62	2023-11-09T14:20:39.444	2023-11-09T15:00:40.360	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000126	0.0126
28	-0.01	0.00	1.85	0.00	0.00	2.78	19.49	16.70	1.29	0.00	42.11	66.55	2023-11-09T15:10:07.250	2023-11-09T15:40:11.989	0	0	0.006	0	0	0.006	0.006	0.006	0.006	0	0.00009	0.009

Exp#	Q_A	Q_B	Q_C	Q_D1	Q_D2	Q_D3	Q_E	Q_F	Q_K4	Q_K5	Flowmeter Total	Site Total	Time Start	Time End	U_A	U_B	U_C	Q_D1	Q_D2	Q_D3	Q_E	Q_F	Q_K4	Q_K5	RSS	%U
29	18.56	18.56	18.56	0.00	0.00	18.56	-0.06	0.32	18.56	0.00	93.07	117.51	2023-11-09T15:50:00.857	2023-11-09T16:30:06.796	0.006	0.006	0.006	0	0	0.006	0	0.006	0.006	0	0.000108	0.0108
30	5.57	13.92	2.78	0.00	3.71	0.00	21.33	50.11	0.00	1.28	98.71	123.15	2023-11-09T16:50:02.293	2023-11-09T17:30:04.556	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0	0.006	0.000126	0.0126
31	0.00	-0.01	0.00	0.00	0.00	0.00	37.07	37.09	0.03	0.00	74.17	98.61	2023-11-10T08:09:19.152	2023-11-10T08:39:30.471	0	0	0.006	0	0	0	0.006	0.006	0.006	0	0.000072	0.0072
32	18.56	18.56	18.56	18.56	0.00	0.00	-0.10	0.32	18.56	0.00	93.03	117.46	2023-11-10T08:49:00.098	2023-11-10T09:19:03.130	0.006	0.006	0.006	0.006	0	0	0	0.006	0.006	0	0.000108	0.0108
33	0.00	-0.01	0.00	0.00	0.00	0.00	18.54	18.55	0.00	0.00	37.08	61.52	2023-11-10T09:29:12.293	2023-11-10T09:59:26.293	0	0	0.006	0.006	0	0	0.006	0.006	0.006	0	0.00009	0.009
34	16.51	16.54	16.51	16.21	0.00	0.00	-0.01	0.00	0.00	15.59	81.35	105.79	2023-11-10T10:10:01.056	2023-11-10T10:53:17.864	0.006	0.006	0.006	0.006	0	0	0	0.006	0	0.006	0.000108	0.0108
35	4.64	4.64	0.00	0.00	0.01	0.00	4.62	4.64	4.64	0.00	23.19	47.63	2023-11-10T11:02:06.039	2023-11-10T11:32:05.908	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
36	-0.01	0.00	0.00	0.01	0.00	0.00	27.84	27.84	0.00	0.00	55.69	80.13	2023-11-10T12:30:00.096	2023-11-10T13:10:06.739	0	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000108	0.0108
37	18.56	18.56	18.56	18.56	0.00	0.00	18.55	18.56	18.56	0.00	129.92	154.36	2023-11-10T13:15:08.208	2023-11-10T13:55:03.609	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000126	0.0126
38	18.56	18.56	18.56	0.00	0.00	18.56	18.56	18.56	0.00	18.56	129.94	154.38	2023-11-10T14:00:12.192	2023-11-10T14:40:13.075	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.006	0.000126	0.0126
39	0.00	-0.01	0.00	6.50	0.00	0.00	19.49	16.70	0.00	0.00	42.69	67.13	2023-11-10T15:05:01.397	2023-11-10T15:35:06.503	0	0	0.006	0.006	0	0	0.006	0.006	0.006	0	0.00009	0.009
40	9.28	9.28	0.00	0.00	0.01	0.00	0.01	0.01	9.28	0.00	27.86	52.30	2023-11-10T15:40:00.740	2023-11-10T16:10:06.764	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
41	18.56	18.56	18.56	0.00	18.49	0.00	27.83	27.84	18.56	0.00	148.42	172.86	2023-11-10T16:15:19.908	2023-11-10T16:45:20.823	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
42	18.56	0.00	0.00	18.56	0.00	0.00	50.22	0.01	0.00	0.00	87.36	111.80	2023-11-11T09:51:39.948	2023-11-11T10:50:10.126	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000126	0.0126
43	0.00	18.56	18.56	0.00	0.00	0.00	9.27	55.68	0.00	0.00	102.08	126.52	2023-11-11T11:00:08.579	2023-11-11T12:00:12.439	0	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000108	0.0108
44	0.00	0.00	0.00	0.00	0.00	0.00	0.01	9.28	0.00	0.00	9.28	33.72	2023-11-11T12:10:19.641	2023-11-11T12:40:27.410	0	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000108	0.0108
45	0.00	0.00	0.00	0.00	4.64	0.00	9.24	0.01	0.00	0.00	13.89	38.33	2023-11-11T13:02:55.106	2023-11-11T13:28:55.765	0	0	0.006	0	0.006	0	0.006	0.006	0	0	0.000072	0.0072
46	0.00	0.00	0.00	4.64	0.00	0.00	9.25	0.01	0.00	0.00	13.90	38.34	2023-11-11T13:40:36.082	2023-11-11T14:09:08.330	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000126	0.0126
47	9.28	0.00	0.00	0.00	0.93	0.00	0.01	0.01	0.93	0.00	11.15	35.59	2023-11-11T14:15:01.192	2023-11-11T14:40:34.068	0.006	0	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000108	0.0108
48	0.00	4.64	0.00	0.00	0.00	0.00	0.01	9.27	0.00	0.00	13.92	38.36	2023-11-11T14:45:06.953	2023-11-11T15:23:18.578	0	0.006	0.006	0	0	0	0.006	0.006	0	0	0.000072	0.0072
49	9.26	0.00	0.00	0.00	0.00	9.28	9.27	18.55	9.28	0.00	55.65	80.09	2023-11-11T16:00:06.250	2023-11-11T17:00:15.344	0.006	0	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000108	0.0108
50	18.56	0.00	0.00	0.00	0.00	18.56	36.98	0.01	0.00	0.00	74.11	98.55	2023-11-12T08:15:12.714	2023-11-12T08:56:17.563	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000126	0.0126
51	0.00	18.56	18.56	0.00	0.00	0.00	9.27	37.12	0.00	0.00	83.53	107.96	2023-11-12T09:10:19.711	2023-11-12T09:45:23.482	0	0.006	0.006	0	0	0.006	0.006	0.006	0	0.006	0.000108	0.0108
52	0.00	0.00	0.00	0.93	0.00	0.00	0.01	9.28	0.93	0.00	11.14	35.58	2023-11-12T09:55:08.844	2023-11-12T10:33:40.553	0	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000108	0.0108
53	0.00	0.00	0.00	0.00	4.64	0.00	9.26	0.01	0.00	0.00	13.91	38.34	2023-11-12T10:44:56.749	2023-11-12T11:20:37.606	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
54	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.01	24.45	2023-11-12T12:30:00.602	2023-11-12T13:00:00.389	0.006	0	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000108	0.0108
55	0.00	0.00	0.00	1.86	0.00	0.00	0.01	0.00	0.00	0.00	1.87	26.31	2023-11-12T13:05:08.714	2023-11-12T14:01:43.871	0.006	0	0.006	0.006	0	0	0.006	0.006	0	0.006	0.000108	0.0108
56	18.56	18.56	18.56	18.56	0.00	0.00	47.50	92.80	18.56	0.00	233.12	257.56	2023-11-12T14:05:14.356	2023-11-12T14:11:47.965	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000126	0.0126
57	0.00	0.00	0.93	0.00	0.00	0.00	0.01	4.64	0.00	0.00	5.58	30.02	2023-11-12T14:30:19.449	2023-11-12T15:30:22.073	0	0.006	0.006	0	0	0	0.006	0.006	0.006	0	0.00009	0.009
58	0.93	0.00	0.00	0.00	0.00	0.93	0.01	0.01	0.00	0.00	1.87	26.31	2023-11-12T15:41:39.323	2023-11-12T16:36:42.637	0.006	0	0.006	0	0	0.006	0.006	0.006	0	0	0.00009	0.009
59	7.42	0.00	0.00	0.00	0.00	7.43	0.00	37.10	5.97	0.00	57.92	82.36	2023-11-13T09:59:23.510	2023-11-13T10:39:29.814	0.006	0	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000108	0.0108
60	7.43	0.00	0.00	0.00	0.00	7.42	0.00	37.12	7.33	0.00	59.31	83.74	2023-11-13T10:46:02.401	2023-11-13T11:15:36.063	0.006	0	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000108	0.0108
61	7.42	0.00	0.00	0.00	0.00	7.42	0.01	37.09	7.41	0.00	59.36	83.80	2023-11-13T11:22:27.678	2023-11-13T11:52:23.423	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000126	0.0126
62	9.28	0.93	0.00	0.00	0.93	0.00	18.52	0.00	0.00	0.00	29.67	54.11	2023-11-13T12:10:01.424	2023-11-13T12:38:47.726	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0.006	0	0.000126	0.0126
63	0.93	0.00	3.71	0.00	0.00	0.00	0.01	25.98	0.00	5.54	36.17	60.61	2023-11-13T12:50:20.478	2023-11-13T13:19:27.400	0.006	0	0.006	0	0	0	0.006	0.006	0	0.006	0.00009	0.009

Exp#	Q_A	Q_B	Q_C	Q_D1	Q_D2	Q_D3	Q_E	Q_F	Q_K4	Q_K5	Flowmeter Total	Site Total	Time Start	Time End	U_A	U_B	U_C	Q_D1	Q_D2	Q_D3	Q_E	Q_F	Q_K4	Q_K5	RSS	%U
64	4.64	4.64	4.64	4.64	0.00	0.00	29.59	0.01	4.64	0.00	52.80	77.24	2023-11-13T14:30:14.232	2023-11-13T14:44:02.286	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000126	0.0126
65	4.64	9.28	6.50	0.00	4.64	0.00	29.64	0.01	0.00	4.63	59.33	83.77	2023-11-13T15:59:57.197	2023-11-13T16:30:01.065	0.006	0.006	0.006	0	0.006	0	0.006	0.006	0	0.006	0.000126	0.0126
66	18.56	0.00	0.00	18.56	0.00	0.00	44.41	0.01	0.00	0.00	81.54	105.98	2023-11-14T08:15:30.074	2023-11-14T09:15:35.680	0.006	0.006	0.006	0.006	0	0	0.006	0.006	0	0	0.000108	0.0108
67	0.00	18.56	18.56	0.00	0.00	0.00	9.27	55.68	-0.01	0.00	102.07	126.51	2023-11-14T09:25:33.216	2023-11-14T10:25:39.759	0	0.006	0.006	0.006	0	0	0.006	0.006	0	0	0.00009	0.009
68	0.00	0.00	0.00	0.00	0.00	0.00	0.01	9.28	-0.02	0.00	9.27	33.71	2023-11-14T10:35:03.583	2023-11-14T11:35:10.493	0	0	0.006	0	0	0	0.006	0.006	0	0	0.000054	0.0054
69	0.00	0.00	0.00	0.00	4.64	0.00	9.21	0.00	-0.01	0.00	13.84	38.28	2023-11-14T11:44:55.704	2023-11-14T11:53:04.610	0	0.006	0.006	0	0.006	0	0.006	0.006	0	0	0.00009	0.009
70	18.56	18.56	18.56	0.00	0.00	18.56	45.90	99.64	18.56	0.00	238.34	262.78	2023-11-14T13:58:06.401	2023-11-14T14:09:07.384	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0.006	0	0.000126	0.0126
71	0.00	4.64	0.00	0.00	0.00	0.00	0.01	9.28	0.00	0.00	13.93	38.37	2023-11-14T14:29:54.462	2023-11-14T15:59:55.332	0	0.006	0.006	0.006	0	0	0.006	0.006	0.006	0	0.000108	0.0108

B: Equipment List and engineering diagrams

Table B-1: List of electrical components

№	Product Name	Quantity
1	FTP 4-Pairs (FOD-CAT6-1KFT)	**305 m/ 2 pack**
2	Leakage Circuit Breaker Box, 4 Way Garage Caravan Consumer Unit 63a 30ma RCD 4MCB 2x6a 20a 32a	**1**
3	Button Switch DC 24V SPDT 5 Pin 5 Pack	**1**
4	AC/DC CONVERTER 24V 31W	**5**
5	SSR RELAY SPST-NO 15A 75-250V	**5**
6	AC/DC CONVERTER 24V 46W	**2**
7	Electriduct 3/4" Flame Retardant Polypropylene	**18**
8	Dustproof Waterproof IP65 Junction ElectricalBox (150mmx110mmx70mm)	**5**
9	Dustproof Waterproof IP65 Junction Electrical Box (200mmx155mmx80mm)	**3**
10	Uenhoy 6 Pcs NPT 1" Cable Glands Waterproof Nylon Cord Grip Cable Glands Strain Relief Cord Connectors	**6**
11	Dual Wall Heat Shrink Tubing (Dia 40mm(1.6")	**2**
12	25 Ft Extension Cord with 3 Outlets, UL Listed 16/3 SJTW, 3-Wire Grounded, 13A 125V 1625W	**1**
13	20 Inch 1 to 4 Extension Cord Splitter, 16/3 SJTW 3 Prong Power Cord.	**2**
14	PORTABLE CORD,250FT.,16 AWG, BLACK Standards - UL FlexibleCord, CSA, MSHAApproved, RoHS Compliant	**540m./7 pack2**
15	Kasonic 25 Ft Extension Cord with 3 Outlets, UL Listed 16/3 SJTW, 3-Wire Grounded, 13A 125V 1625W for Indoor/Outdoor Use - Green	**76,2m./1 pack**

Table B-2: List of Pipeline Equipment

Type	Size	Model	Certification	Quantity
Flow controller	1 1/4 inch	Alicat MCR-3000SLPM-D-485-X/5M	ATEX/CSA Class 1 Zone/Div 2 area rated	2
Flow controller	3/4 inch	Alicat MCR-500SLPM-D-485-X/5M	ATEX/CSA Class 1 Zone/Div 2 area rated	5
Ball Valve	2 inch	68AMLL-2 KITZ	CAN/CGA 3.16-M88 - 125 PSI	1
Solenoid Valve	3/4 inch	Shako PU225A-06 (FKM)	ATEX EExmIIT4 II 2G & 2D	5
PE pipe	2 inch	PE-32-250 GASTITE	CAN/CSA-B137.4	2
PE pipe	1-1/4inch	PE-20-250 GASTITE	CAN/CSA-B137.4	5
PE fitting	2 inch	PECPL-32 GASTITE	CAN/CSA-B137.4	1
PE pipe	3/4 inch	PE-12-250 GASTITE	CAN/CSA-B137.4	3
PE fitting	2 inch	PET-32	CAN/CSA-B137.4	1
PE fitting	2 1-1/4 2 inch	PERT-32-32-20	CAN/CSA-B137.4	2
PE fitting	1-1/4 3/4 1-1/4 inch	PERT-16-16-12	CAN/CSA-B137.4	3
PE fitting	2 inch	TRANS-32	CAN/CSA-B137.4	1
PE fitting	1-1/4inch	TRANS-20	CAN/CSA-B137.4	2
PE fitting	3/4 inch	TRANS-12	CAN/CSA-B137.4	11
PE fitting	2 1-1/4inch	PECPL-20-32	CAN/CSA-B137.4	2
PE fitting	1-1/4 3/4 inch	PECPL-12-20	CAN/CSA-B137.4	2

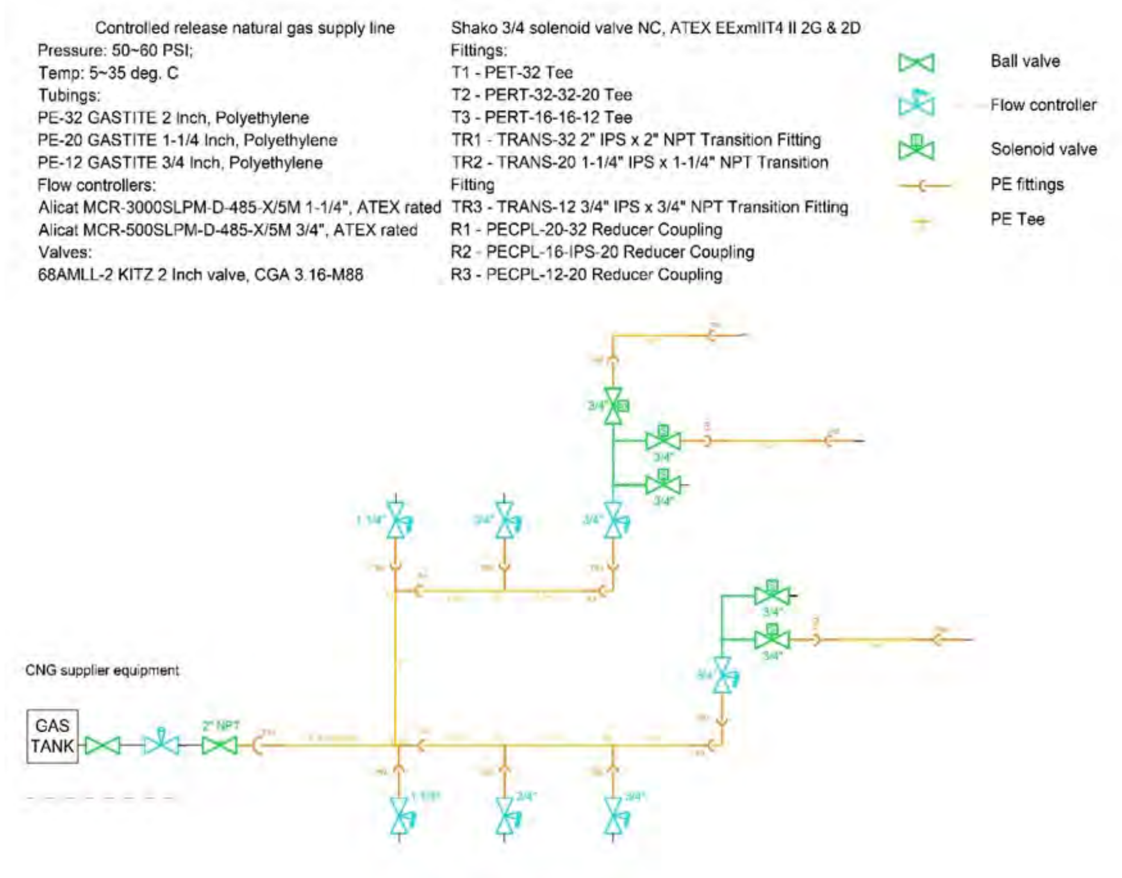

Figure B-1: Piping and instrumentation diagramf piping assembly

PRODUCT

CAMPBELL SCIENTIFIC
WHEN MEASUREMENTS MATTER

MetSens500

Compact Weather Sensor for Temperature, RH, Barometric Pressure, and Wind with Compass

Measures 5 Common Meteorological Parameters

IEC 61724-1 Compliant

Overview

The MetSens500 compact weather sensor measures wind speed and direction via an ultrasonic sensor, as well as air temperature, relative humidity, and barometric pressure, in a single, combined instrument mounted inside three double-louvered, naturally aspirated radiation shields with no moving parts. An integrated electronic compass allows the MetSens500 to provide accurate, relative wind direction measurements without being oriented in a particular way, making installation easier. WMO average wind speed and direction and gust, temperature, relative humidity, barometric pressure, absolute humidity, air density, and wet bulb temperature data are provided. The MetSens500 is compatible and easily integrated with the MeteoPV Solar Resource Platform and any Campbell Scientific data logger using SDI-12, RS-485, ModbusRS-485, or NMEA RS-232.

Benefits and Features

- Quality measurements
- Fast and simple to install
- Compact, integrated design
- Lightweight and robust

Specifications

Measurements Made	Air temperature, barometric pressure, relative humidity, wind direction, and wind speed.
Sampling Rate	1 Hz
Digital Communication Modes	Serial RS-232, RS-485, SDI-12, NMEA, Modbus, ASCII
IP Rating	66
Compliance	CE, RoHS Where applicable, all individual parameters meet or exceed specifications of IEC 61724-1 (2017, 2021).
Operating Temperature Range	-40° to +70°C
Operating Voltage	5 to 30 Vdc
Typical Current Drain @ 12 Vdc	25 mA (continuous high mode) 0.7 mA (eco-power mode; 1 hour polled)
Weight	0.7 kg (1.5 lb)

Air Temperature Measurement

Measurement Range	-40° to +70°C
Resolution	0.1°C
Accuracy	±0.3°C (@ 20°C)

Relative Humidity Measurement

Measurement Range	0 to 100%
Resolution	0.1
Accuracy	±2% @ 20°C (10 to 90% RH)

Barometric Pressure Measurement

Measurement Range	300 to 1100 hPa
Resolution	0.1 hPa
Accuracy	±0.5 hPa (@ 25°C)

Wind Speed Measurement

Measurement Range	0.01 to 60 m s^{-1}
Accuracy	±5% (up to 60 m s^{-1}) ±3% (up to 40 m s^{-1})
Resolution	0.01 m s^{-1}
Starting Threshold	0.01 m s^{-1}

Wind Direction Measurement

Measurement Range	0° to 359°
Accuracy	±3° (up to 60 m s^{-1})
Resolution	1°

Compass

Measurement Range	0 to 359°
Resolution	1°
Units of Measure	Degrees
Accuracy	±3°

For comprehensive details, visit: www.campbellsci.com/metsens500

PRODUCT

CAMPBELL® SCIENTIFIC
WHEN MEASUREMENTS MATTER

MetSens200

Compact Weather Sensor for Wind with Compass

Measures Wind Speed and Direction

IEC 61724-1 Compliant

Overview

The MetSens200 compact weather sensor measures wind speed and direction via an ultrasonic sensor. An integrated electronic compass allows the MetSens200 to provide accurate, relative wind direction measurements without being oriented in a particular way, making installation easier. WMO average wind speed and direction and gust data are provided. The MetSens200 is compatible and easily integrated with the MeteoPV Solar Resource Platform and any Campbell Scientific data logger using SDI-12, RS-485, ModbusRS-485, or NMEA RS-232.

Benefits and Features

- Quality measurements
- Fast and simple to install
- Compact, integrated design
- Lightweight and robust

Specifications

Measurements Made	Wind direction and wind speed
Sampling Rate	1 Hz
Digital Communication Modes	Serial RS-232, RS-485, SDI-12, NMEA, Modbus, ASCII
IP Rating	66
Compliance	CE, RoHS Where applicable, all individual parameters meet or exceed specifications of IEC 61724-1 (2017, 2021).
Operating Temperature Range	-40° to +70°C
Operating Voltage	5 to 30 Vdc
Typical Current Drain @ 12 Vdc	0.7 mA (eco-power mode; 1 hour polled) 25 mA (continuous high mode)
Weight	0.5 kg (1.1 lb)

Wind Speed Measurement

Measurement Range	0.01 to 60 m s^{-1}
Accuracy	±3% (up to 40 m s^{-1}) ±5% (up to 60 m s^{-1})
Resolution	0.01 m s^{-1}
Starting Threshold	0.01 m s^{-1}

Wind Direction Measurement

Measurement Range	0° to 359°
Accuracy	±3° (up to 60 m s^{-1})
Resolution	1°

Compass

Measurement Range	0 to 359°
Resolution	1°
Units of Measure	Degrees
Accuracy	±3°

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C: Localization assessment maps

Figures C-1 to C-4 shows localization assessment maps for methodologies C, G, L, M and N. Maps show all submitted leak estimate coordinates and active release points that vendors participated in during the study. Leak estimates are shown using circles filled with a single color. White circles with a smaller black circle show release nodes. Squares with hashed black lines indicate active release points and the bounding box is used to determine true positive leak estimates.

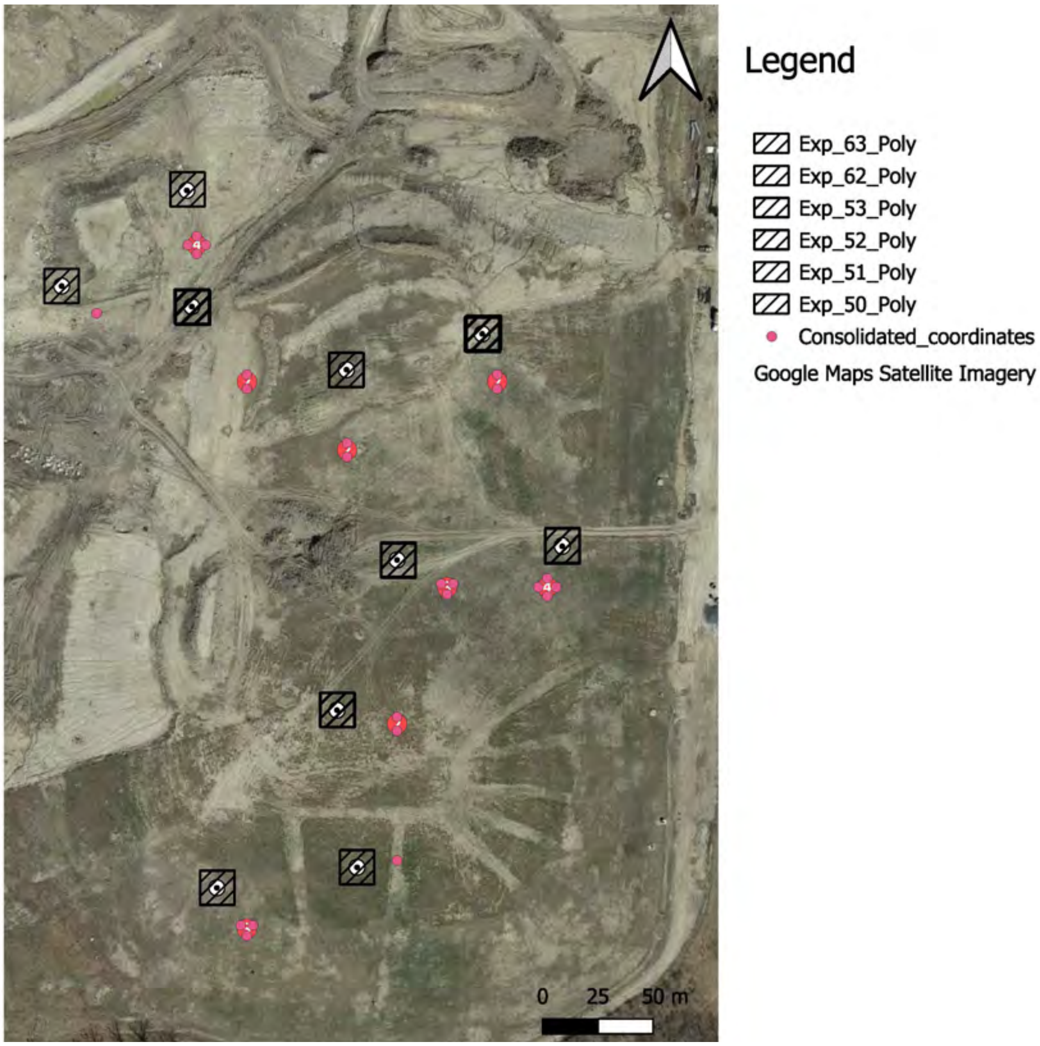


Figure C-1: Vendor C localization assessment map. Overlapping points are shown as a point cluster.

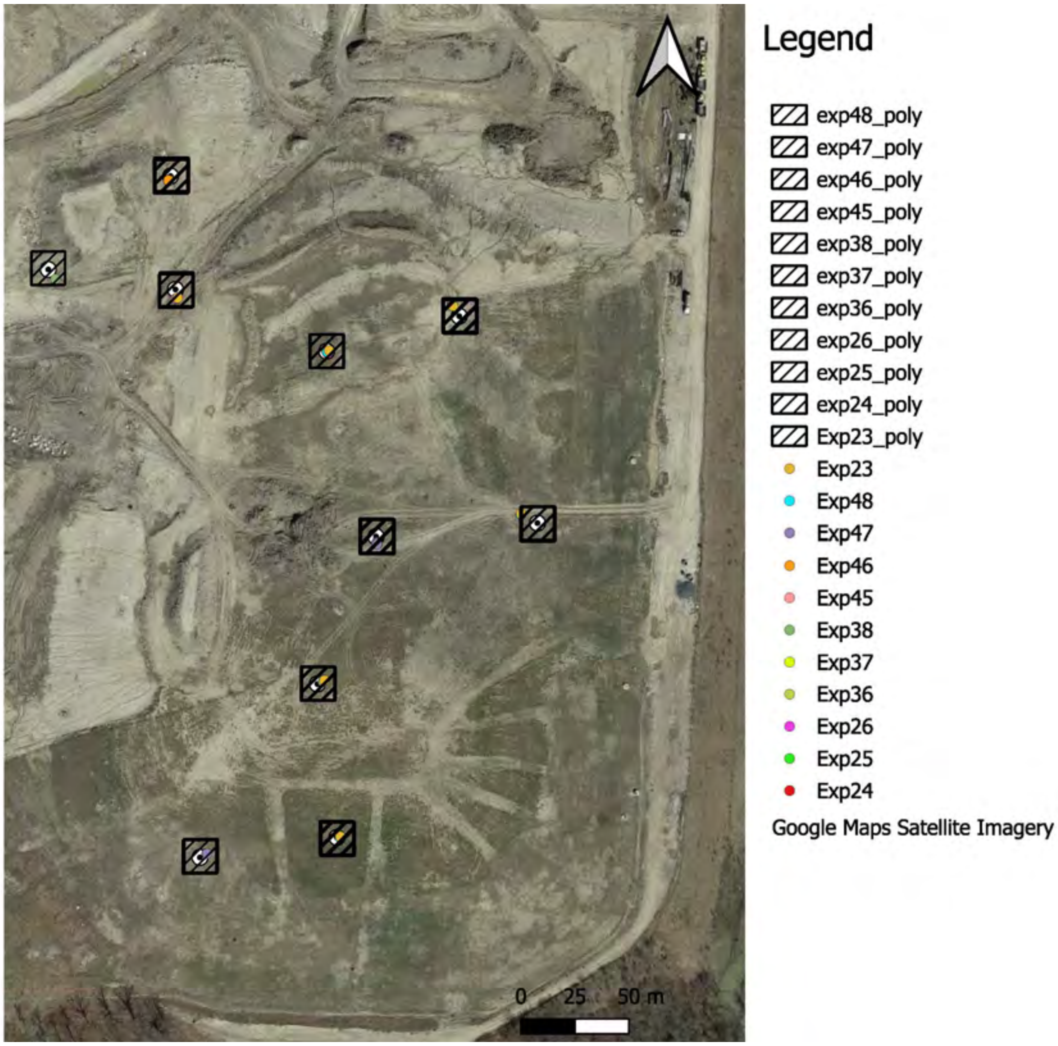


Figure C-2: Vendor G localization assessment map

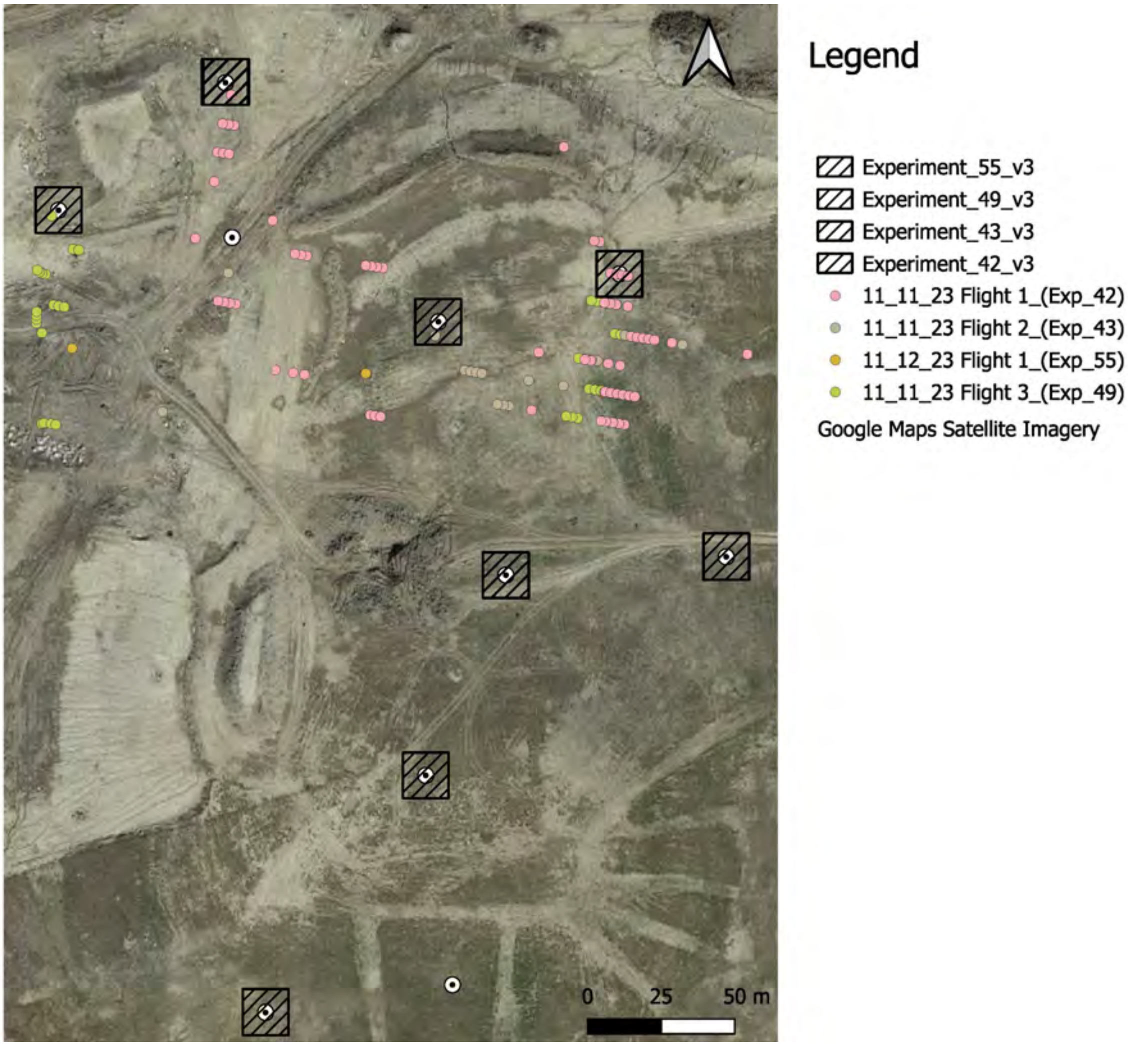


Figure C-3: Vendor L localization assessment map

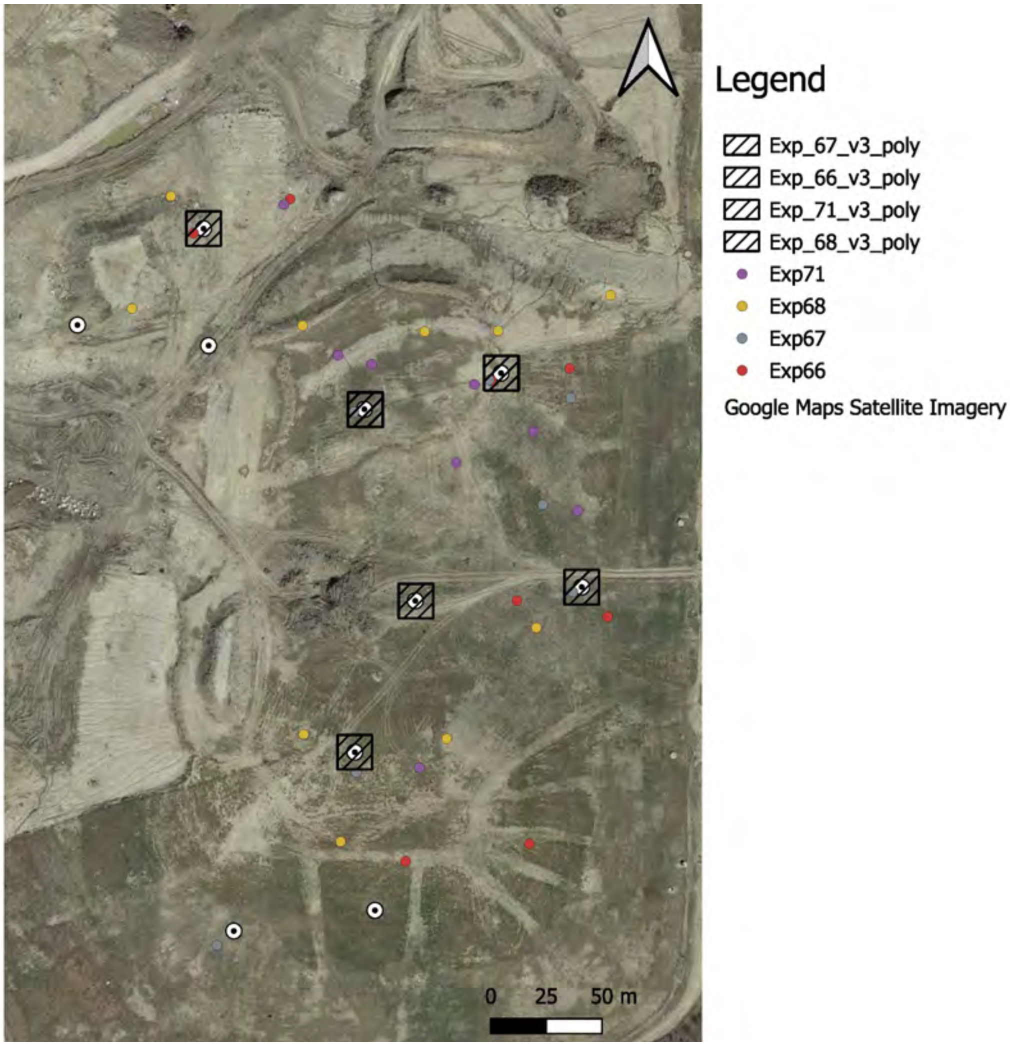


Figure C-4: Vendor M localization assessment map

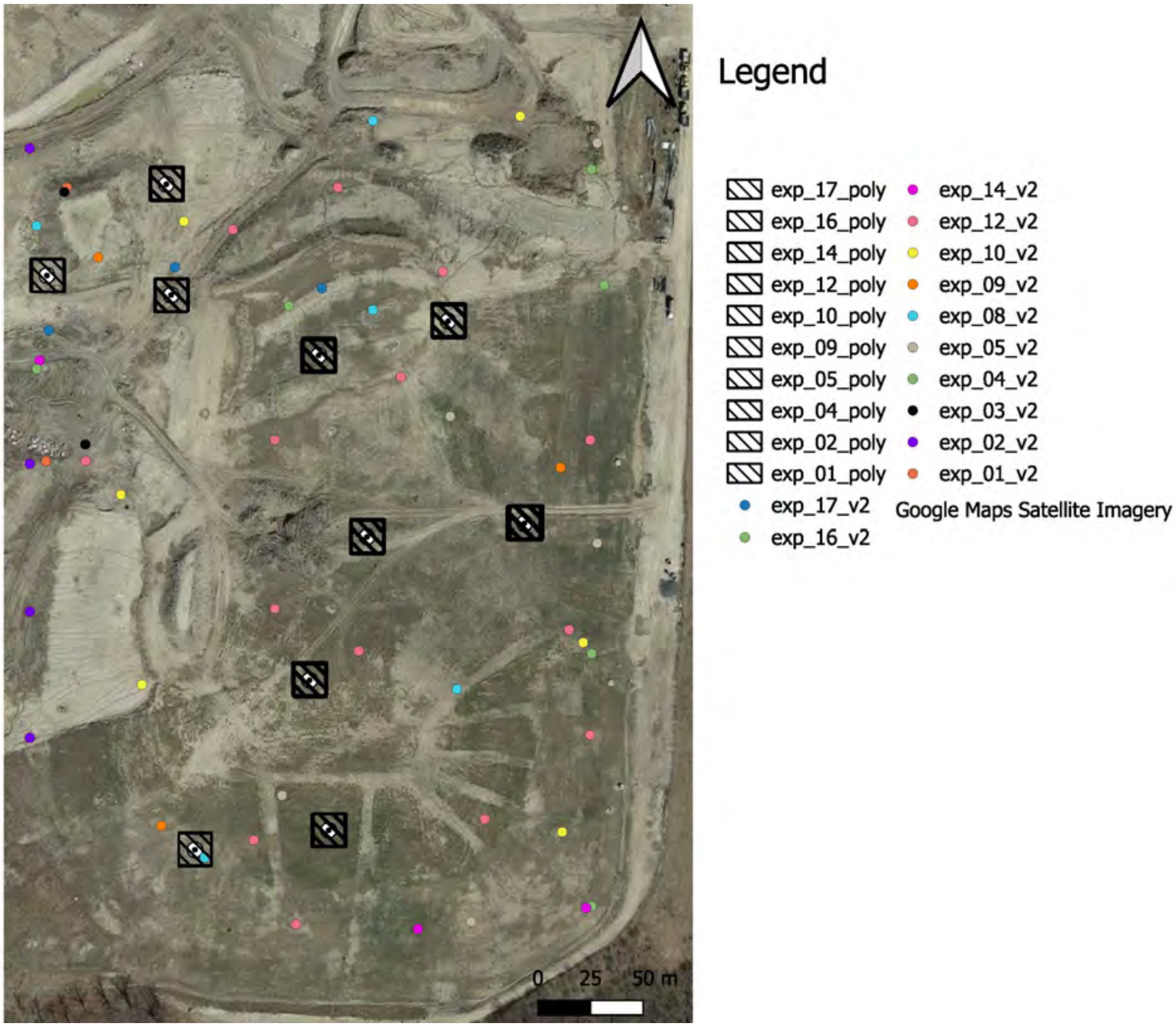


Figure C-5: Vendor N localization assessment map

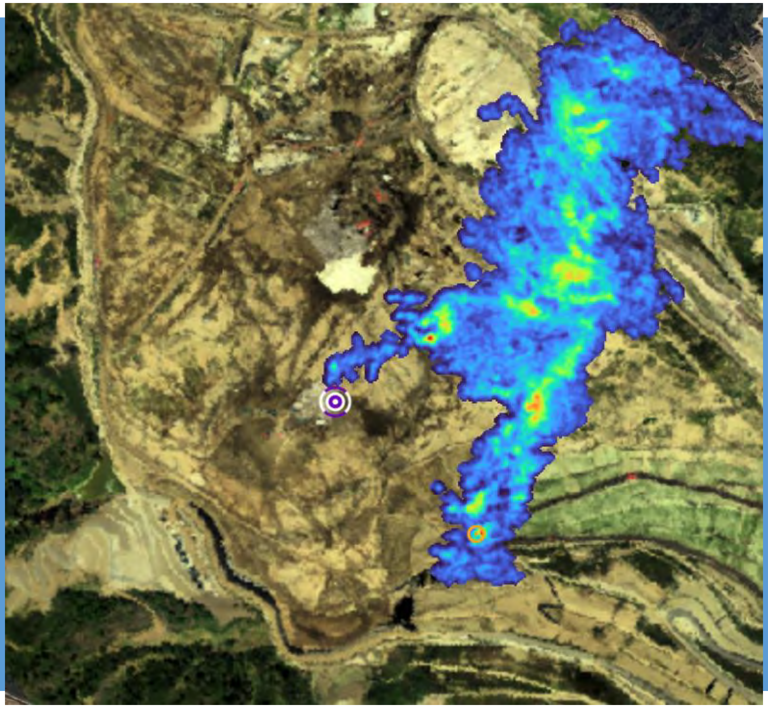
D: Methodology properties

Table D-1: Methodology summary table

Technology Identifier	Method	R&D ?	Cost Estimates [USD]	Limitations	Vendor Reported minimum detection limit
A	MGPA	No	$5,000 /day	Can operate in most weather conditions. Ideal weather conditions for methane measurement around a landfill include stable and moderate wind speeds, consistent temperatures, absence of precipitation, and stable barometric pressure.	5 kg/hr
B	MGPA	No	$5,000 /day	Can operate in most weather conditions. Ideal weather conditions for methane measurement around a landfill include stable and moderate wind speeds, consistent temperatures, absence of precipitation, and stable barometric pressure.	5 kg/hr
C	UPSEA	No	$5,000-8,000 /day	Any precipitation, humidity exceeding 95%, temperature below 5 degrees Celsius or above 40 degrees Celsius and windspeed exceeding 12 m/s prevent measurements from taking place.	0.02 kg/hr
D	UPSEA	No	$5,000-8,000 /day	Any precipitation and/or windspeed exceeding 18 m/s prevents measurements from taking place.	1 ppb/s
E	MTCEA	No	$5,000 /day	Lightning and heavy rain prevent measurements from taking place.	5 kg/hr
F	APSEA	No	14,000 /day	Very stable atmospheric conditions, high winds or rapidly varying wind directions are not suitable for this method. Precipitation, extreme turbulence and conditions that does not allow visual flight to be observed	3-5 kg/hr

				prevent measurements from taking place.	
G	LiDAR	No	$14,000 /day	Conditions that do not allow visual flight rules to be observed and/or 10 m windspeed below 2 m/s or exceeding 9 m/s prevents measurements from taking place.	0.5 kg/hr
H	SISEA	No	$3,000-6,500 / package	Cloud cover over the site or wind speed exceeding 10 m/s.	100 kg/hr
I	RPSEA	Yes	$7,000-30,000 / year	Requires clear weather conditions to take measurements.	Not available
J	RPSEA	Yes	$7,000-30,000 / year	Below - 40 degrees Celsius	100 ppm at 100 meters
K	RPSEA	Yes	$7,000-30,000 / year	Below - 40 degrees Celsius	1 kg/hr
L	UCSEA	No	$5,000-8,000 /day	Precipitation, snow on ground, wind speed exceeding 6 m/s and visibility below 5 km prevent measurements from taking place.	1 ppm
M	UCSEA	No	$5,000-8,000 /day	Precipitation and windspeed exceeding 7 m/s prevent measurements from taking place.	1 ppm
N	LEA	Yes	$5,000 /day	Can operate in most weather conditions. Ideal weather conditions for methane measurement around a landfill include stable and moderate wind speeds, consistent temperatures, absence of precipitation, and stable barometric pressure.	5 kg/hr

EXHIBIT 3



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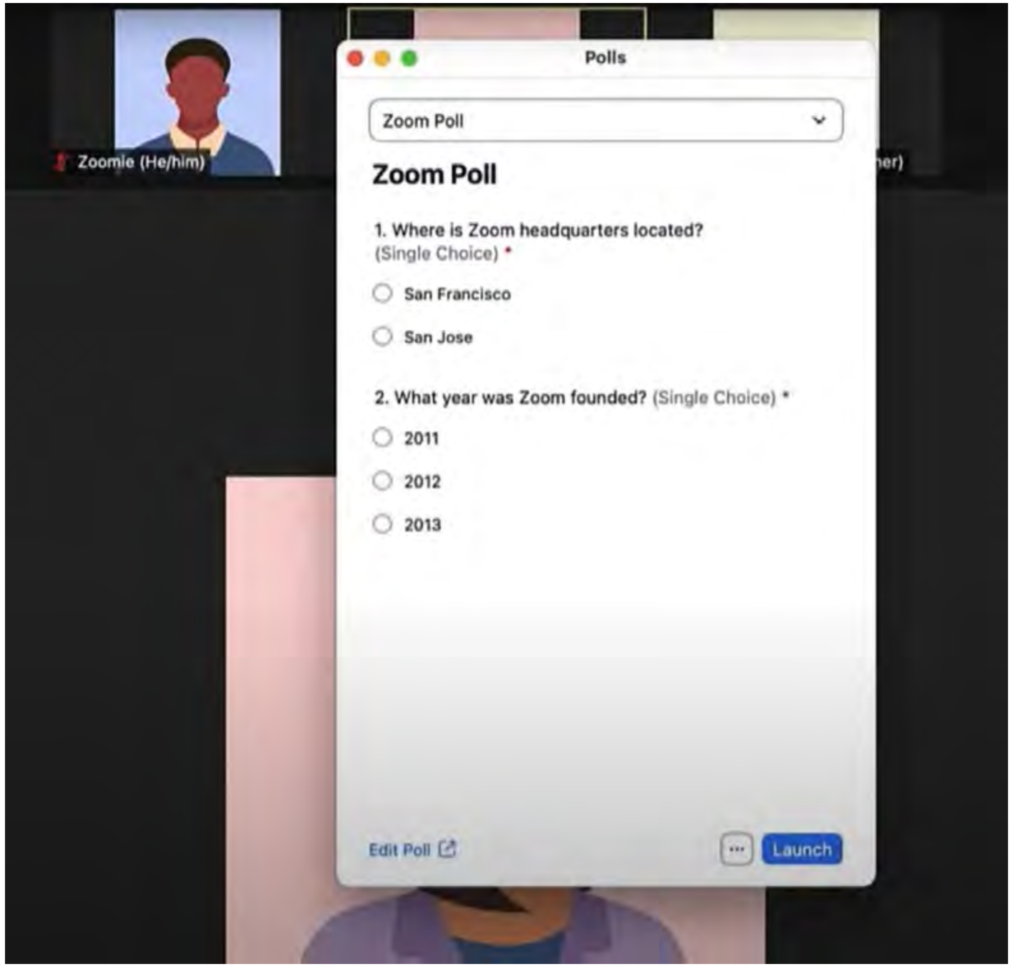

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Registration and Additional Information

Small Drinking Water Systems

December 3: *Lead Reduction Updates and Lead Service Line Identification (LSLID) and Replacement*

Registration and Additional Information

Tools and Resources Training

December 5: *ECOTOX Knowledgebase and PFAS Updates*

Registration and Additional Information

Healthy and Resilient Communities Research

December 10: *Allostatic Load and Epigenetic Age Acceleration as Measures of Cumulative Health Impacts*

Registration and Additional Information

Emergency Response Research

December 11: *Regional Research Partnerships to Address High Priority, Near-Term Research Needs: Splash Pads & COTS Flight Simulator to Support Aerial Recon Training*

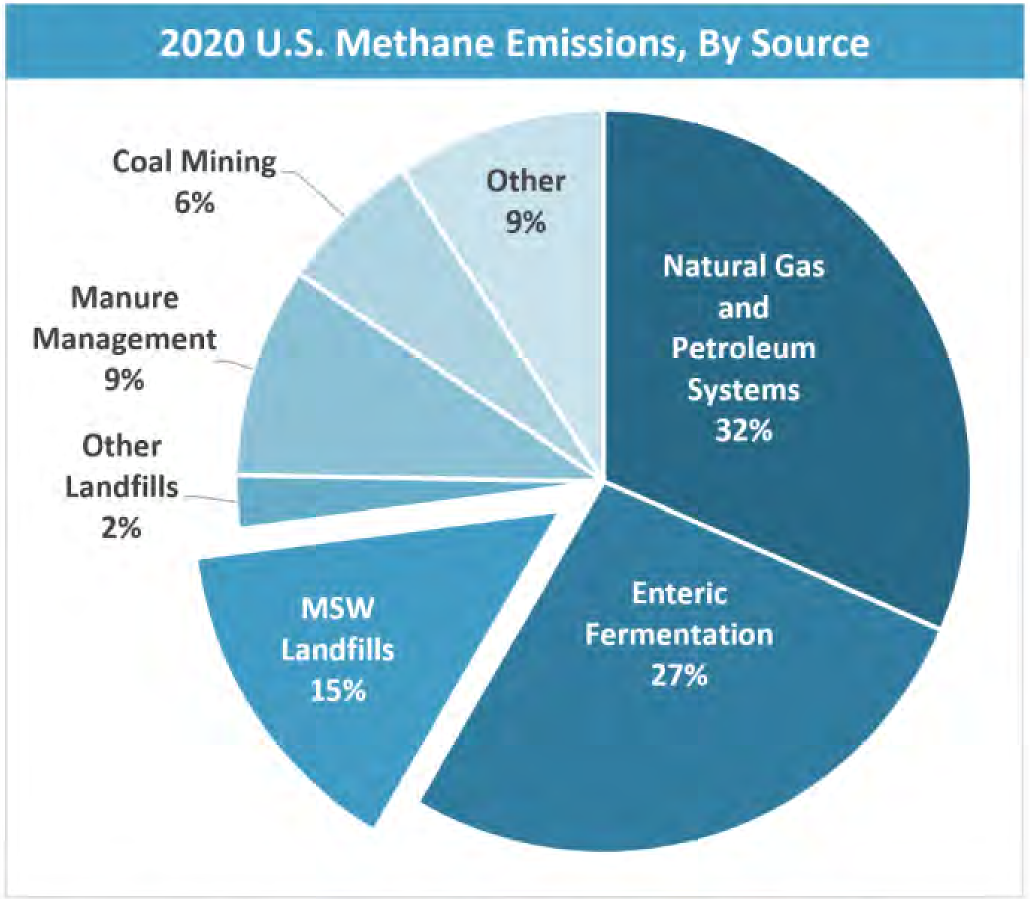
Registration and Additional Information

Airborne Survey - Use of Next Generation Emission Measurement (NGEM) Technology to Detect and Measure Landfill Methane Emissions

Susan Thorneloe, Senior Chemical Engineer

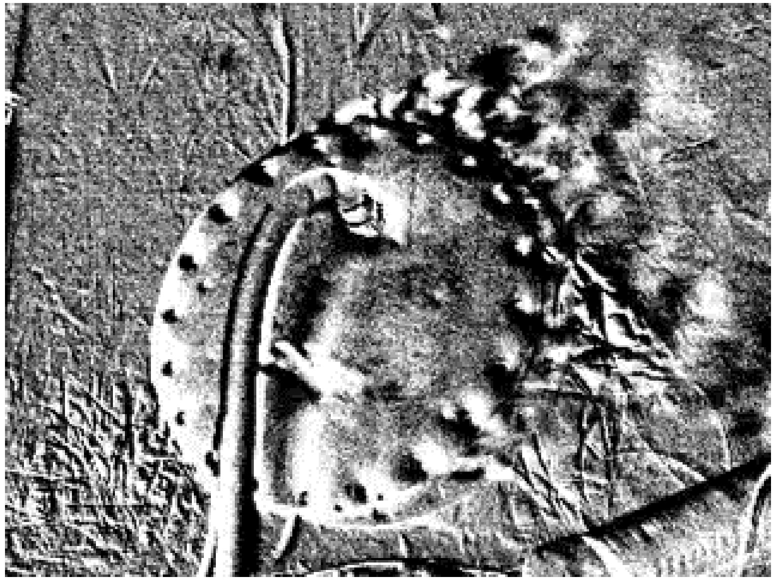
Characterization of Landfill Gas (LFG) and Pollutants

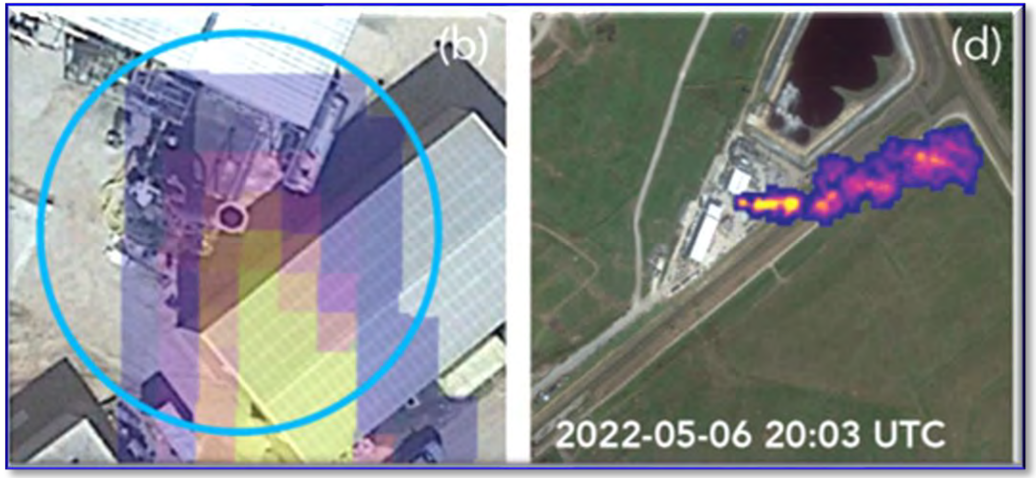
- LFG is roughly 50% methane – potent GHG
- Methane is also flammable and explosive
- VOCs contribute to air quality issues and ozone nonattainment
- HAPs and sulfur emissions affect local health & quality of life



Note: All emission estimates from the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2020.

Examples of **fugitive sources** (can occur on any part of the landfill)





Different fugitive sources not captured through gas capture and control (GCCS)

Cover Integrity Issues

Ground-Based Optical Remote Sensing

- EPA-ORD research helped drive some of the technology changes that we are now seeing
- In the past, site access was required – that is no longer needed thanks to use of satellites, aircraft, and drones

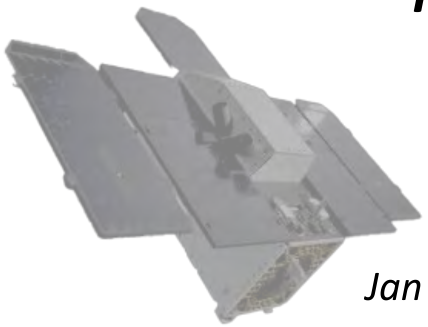
Next Generation Emission Measurement (NGEM) Technology Options for detecting and quantifying landfill methane are growing at an amazing pace

Emerging Satellite Forms

New on the scene

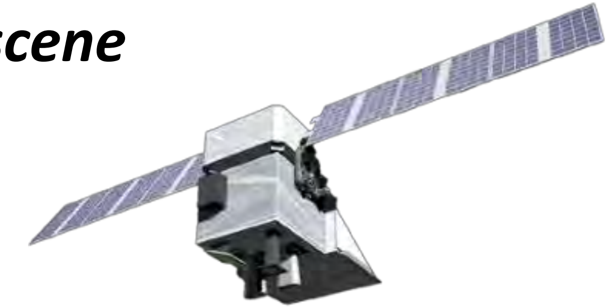
GHGSat

↓



Jan 21, 2024

Carbon Mapper

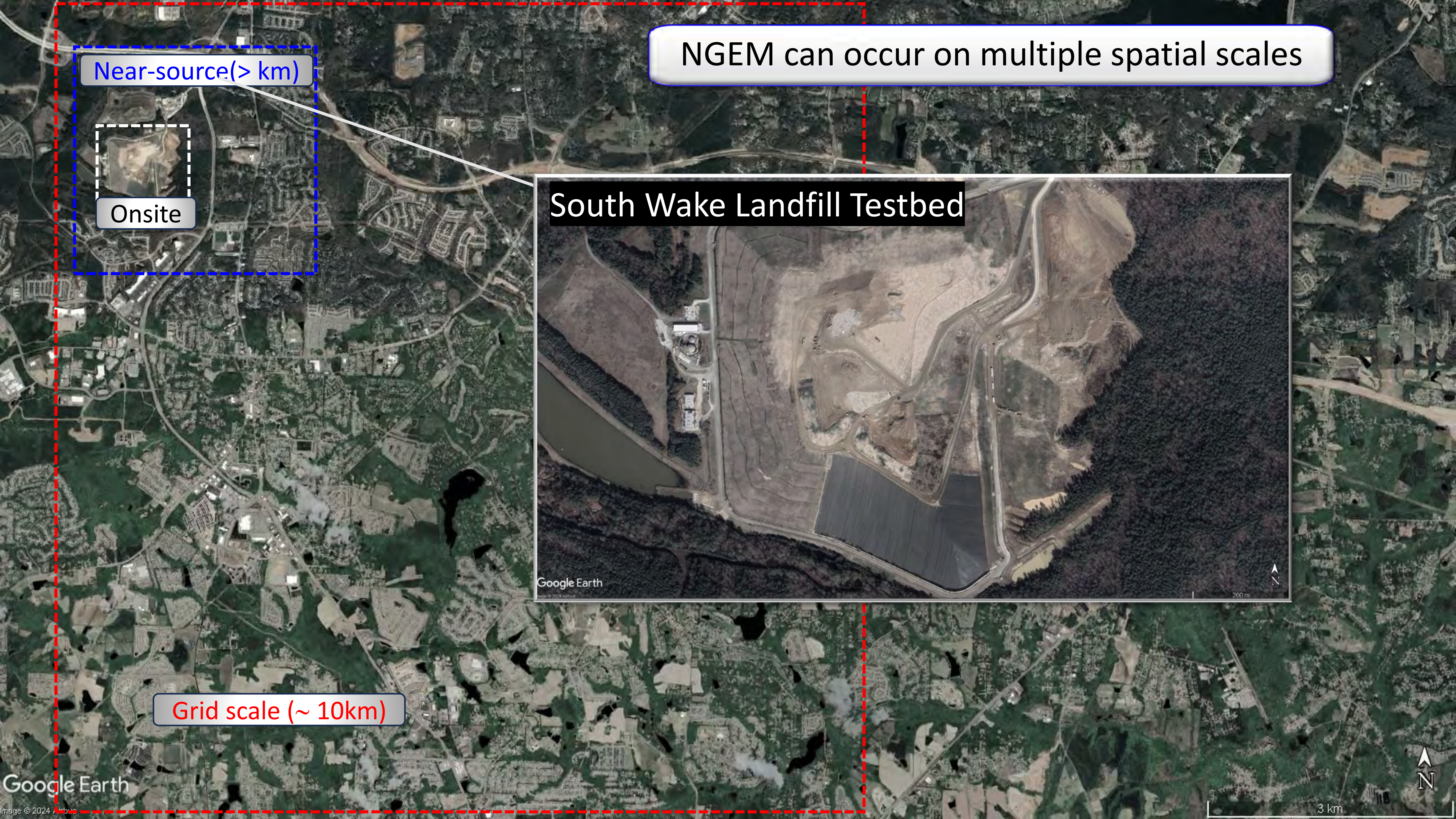


Jan 29, 2024

MethaneSAT

ORD's first look satellite landfill measurements was part of a 2023 NASA evaluation of GHGSat which generated 97 observations of 13 U.S. Landfills. Publications are in process looking at these data in a variety of ways (Max Krause lead).

"NASA Commercial Smallsat Data Acquisition (CSDA) Evaluation of GHGSat to Measure Landfill Methane Emissions", Krause M.J., Thoma. E.D., Thorneloe, S., Valin, L., Szykman, J., NASA Report, (*in review*).

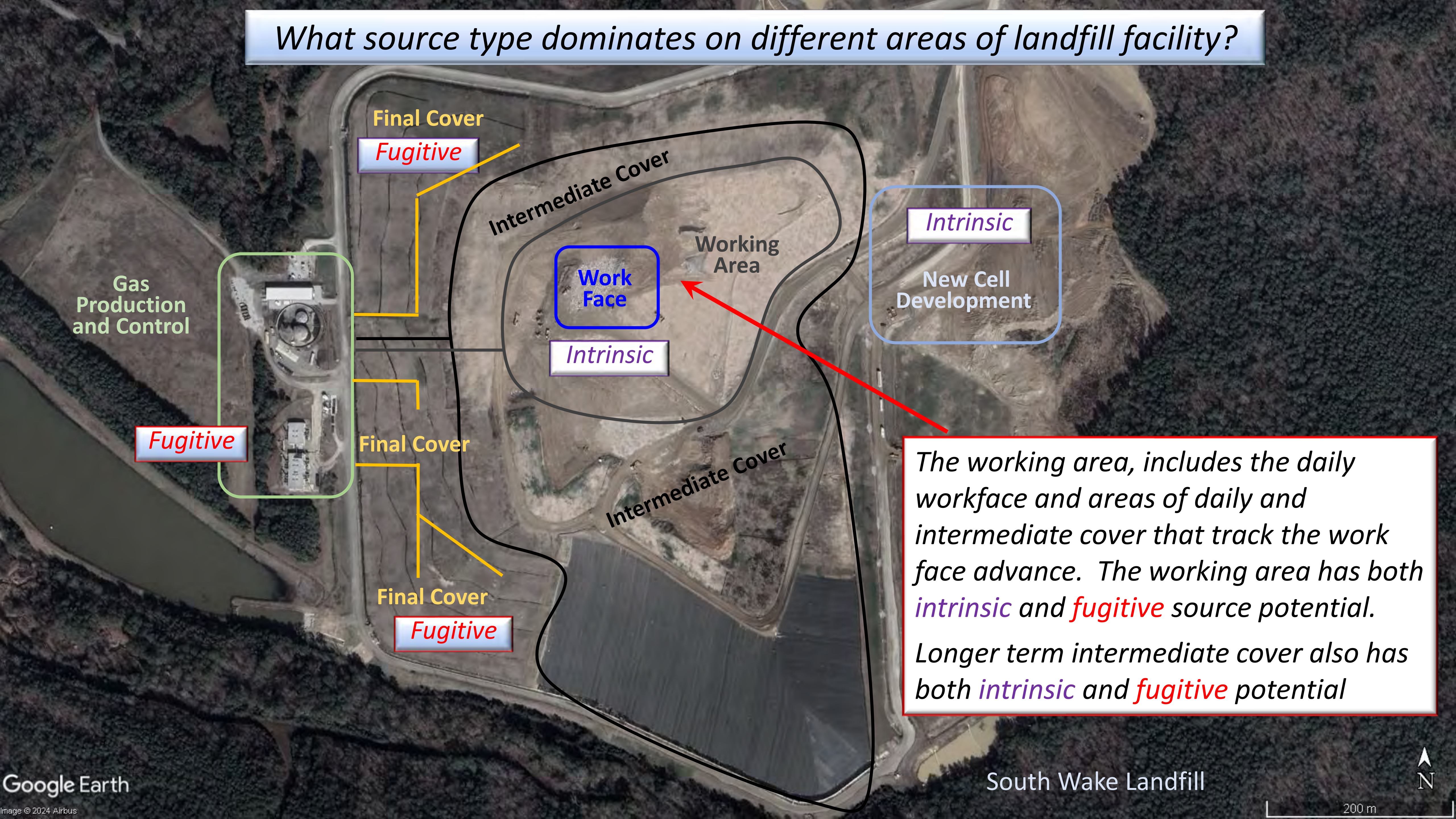


NGEM can occur on multiple spatial scales
Near-source(> km)
Onsite
South Wake Landfill Testbed
Grid scale (~ 10km)
Google Earth
3 km
N

Landfill Methane - Source Types

- Landfills have both intrinsic (or expected) emissions and fugitive sources
- Intrinsic emissions are partially controlled but can’t be eliminated and include:
  - Work face
  - Intact cover
  - Maintenance activity
- Fugitive sources include:
  - Cover system failure (surface leaks)
  - Gas extraction system issues (various types)
  - Infrastructure leaks, flare issues, or venting due to malfunction state
- Using NGEM to understand and reduce fugitive emissions is a near-term ORD priority
- Improved understanding and control of intrinsic sources is critical but is longer-term

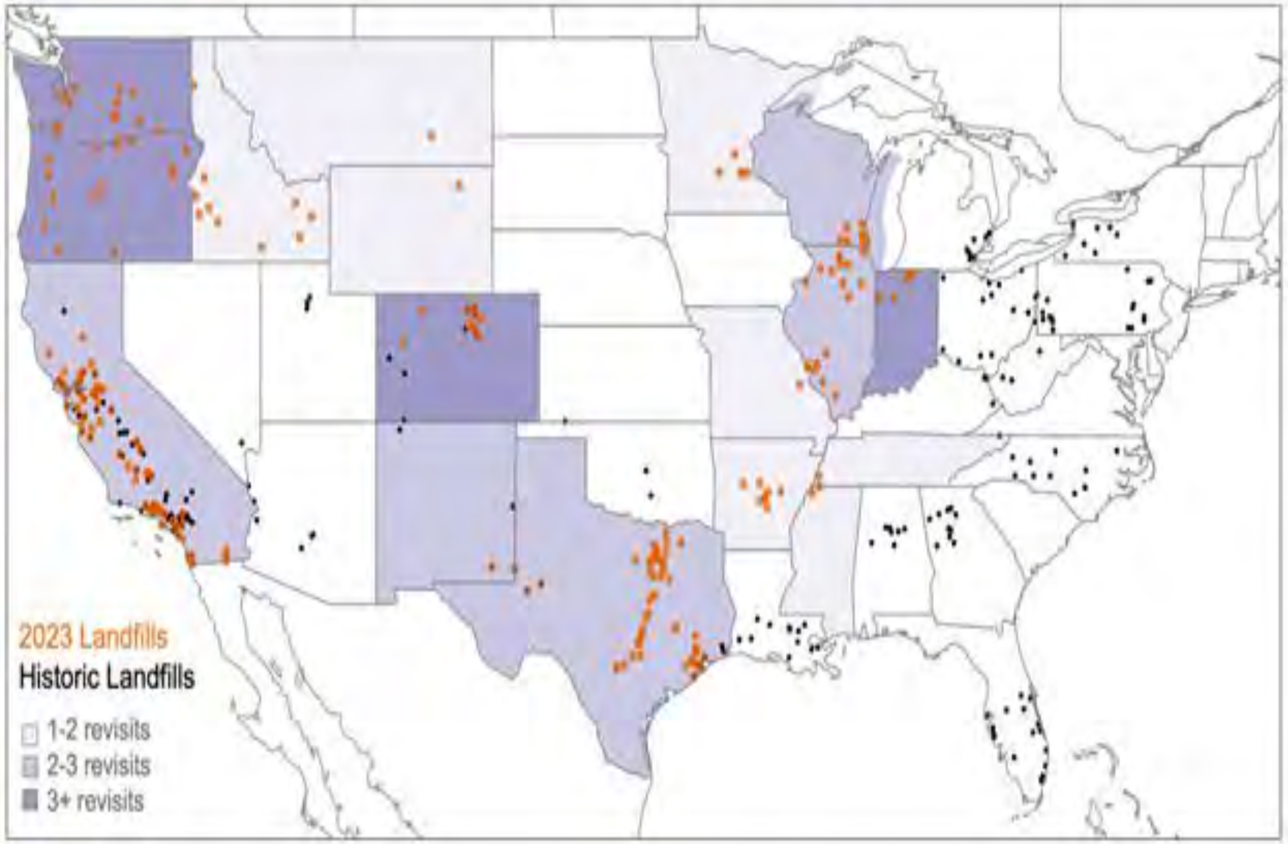
What source type dominates on different areas of landfill facility?



The working area, includes the daily workface and areas of daily and intermediate cover that track the work face advance. The working area has both intrinsic and fugitive source potential.

Longer term intermediate cover also has both intrinsic and fugitive potential

Multi-year surveys using aircraft have produced datasets on landfill methane emissions helping to detect large leaks and quantify methane: Carbon Mapper/NASA-JPL landfill flights from 2016 - 2024



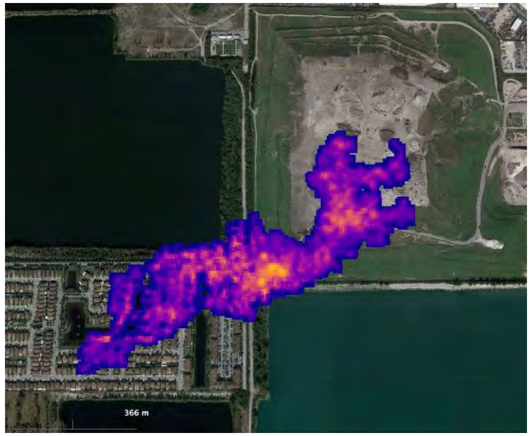
Quantifying methane emissions from United States landfills", Cusworth et al. 2023https://www.science.org/doi/10.1126/science.adi7735

Findings:

- Detection rate for "large" landfills is high: 50% of landfills had large point-source detections (compare to oil & gas where only 0.5-1% detected)
    - Emission persistence is high: 60% persistence even after 8+ flights (oil & gas ~20%)
- Correlation to the EPA Greenhouse Gas Reporting Program (GHGRP) is low. Half of sites are above GHGRP, half below. Emissions from airborne craft about 2.4 times higher than GHGRP (findings in Science publication)

High emission methane point sources observed in many regions outside California

Florida



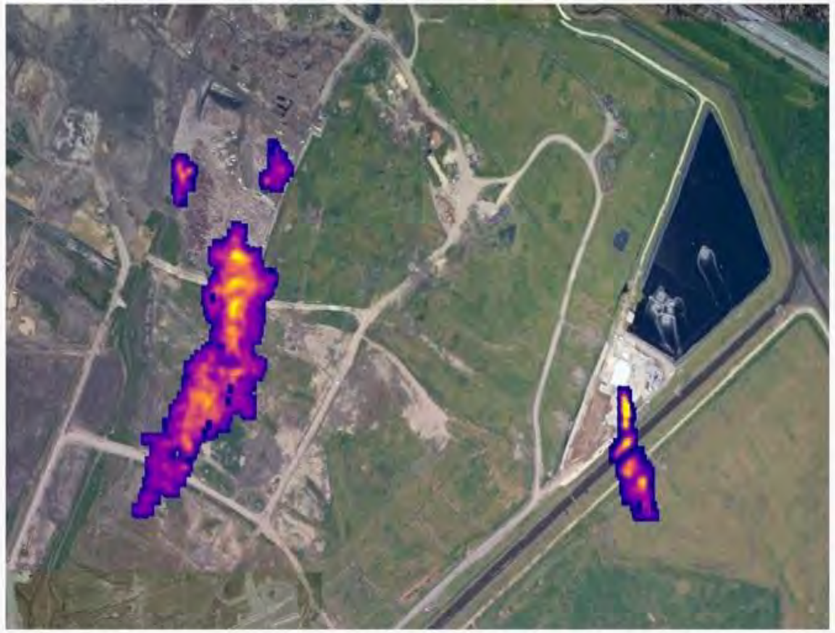
Georgia

Alabama

Louisiana

Amid reports of "super emitters," experts say getting the emissions numbers right is essential to curbing a potent climate pollutant.

By James Bruggers and Phil McKenna (Inside Climate News), Amy Green (WMFE) and Robert Benincasa (NPR)
July 13, 2021



Remote sensing of methane from high altitude aircraft reveals plumes of the gas coming from the open face, on the left, and from a vent, on the right, at the River Birch landfill outside New Orleans in April 2021. Researchers from the University of Arizona, Arizona State University, NASA's Jet Propulsion Laboratory, and Carbon Mapper calculate the rate of methane venting at approximately 2,000 kilograms per hour, which would be 48 metric tons per day. Credit: University of Arizona, Arizona State University, NASA JPL and Carbon Mapper.

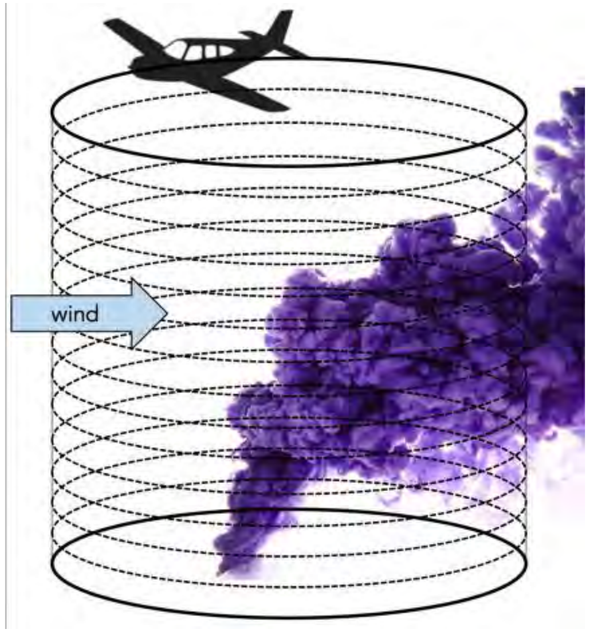
Many similar examples in CA, CO, NV, LA, MI, OH, PA

Independent Validation of the remote sensing methods from NASA-JPL and Scientific Aviation

(1) NASA-JPL researchers surveyed California landfills using a high-altitude remote sensing (aircraft). Additional observations by CM efficiently measured high-emission point sources at hundreds of landfills over large regions.

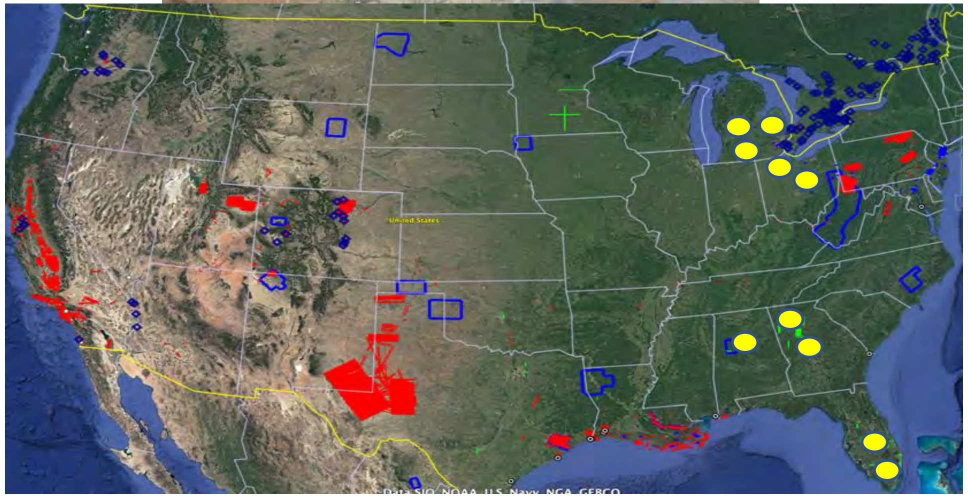
(2) Scientific Aviation (SA) was deployed to provide independent validation of the NASA-JPL/Carbon Mapper measurements using low altitude in-situ sensing aircraft that captures "total" emissions (diffuse and point sources)

Carbon Mapper has also participated in blinded controlled release experiments (Stanford)

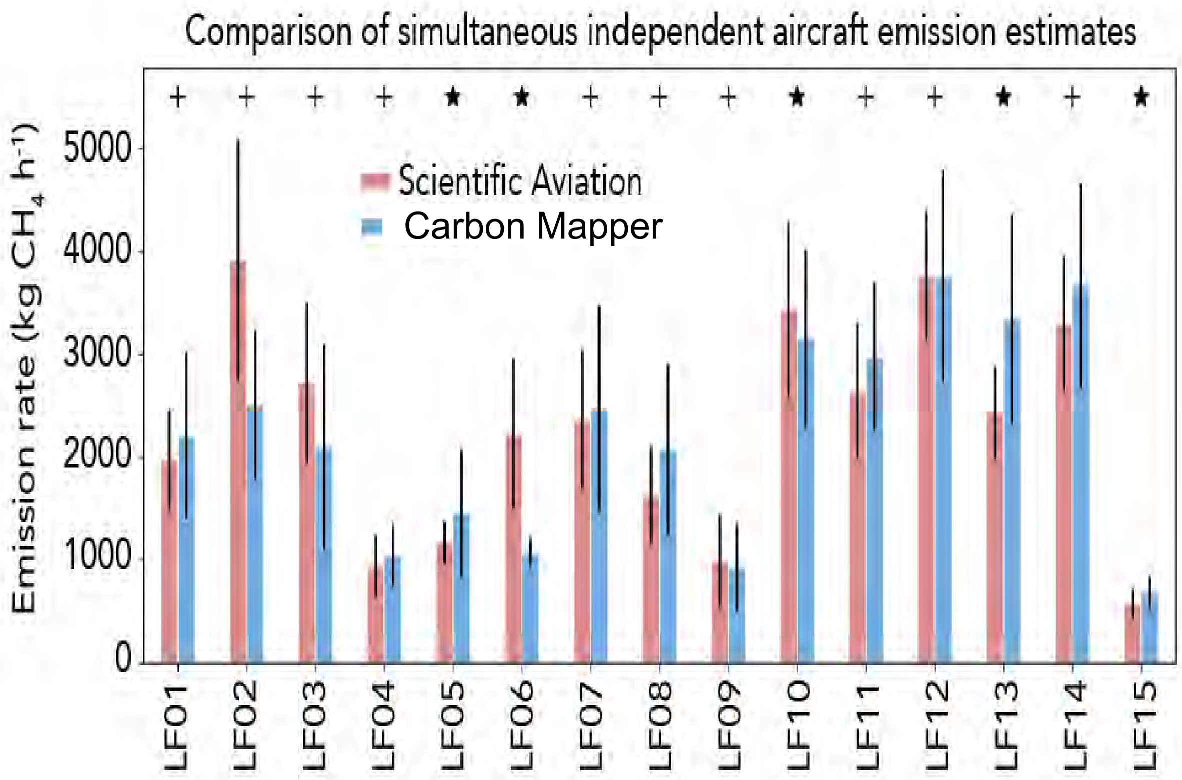


Yellow dots: coordinated validation surveys with both aircraft

Red/blue/green lines: broader regional remote sensing surveys



Results from comparison of simultaneous Carbon Mapper and Scientific Aviation Measurements

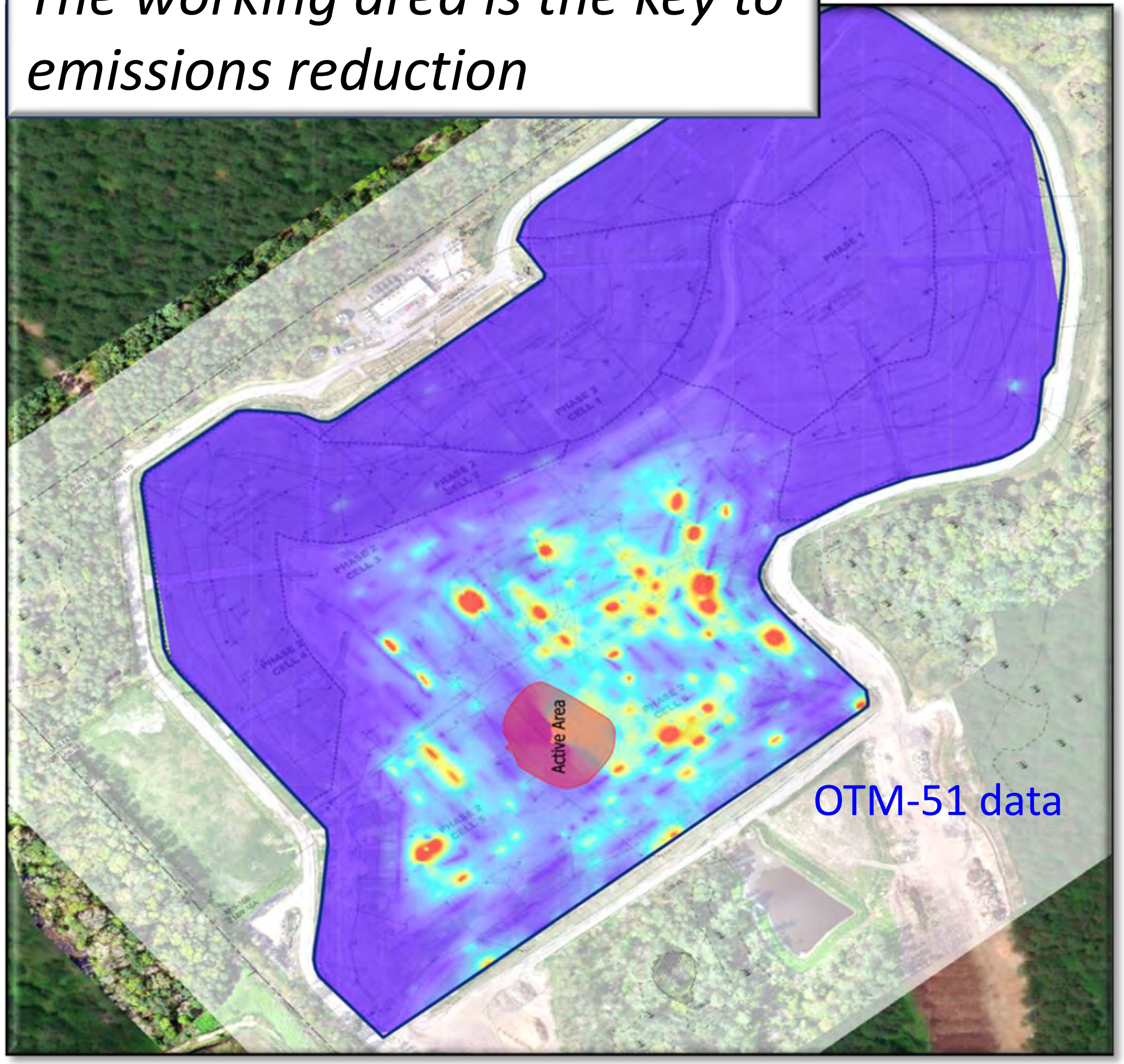


- Airborne hyperspectral imagery (Carbon Mapper) detects discrete point-like sources and general CH_4 enhancements to some degree
- Airborne flux surface (Draft OTM-58A, Champion X/ Sci. Aviation) is a whole facility measurement approach
- Currently, point-like sources appear to represent a significant fraction of whole facility emissions

Quantifying methane emissions from United States landfills", Cusworth et al. 2023https://www.science.org/doi/10.1126/science.adi7735

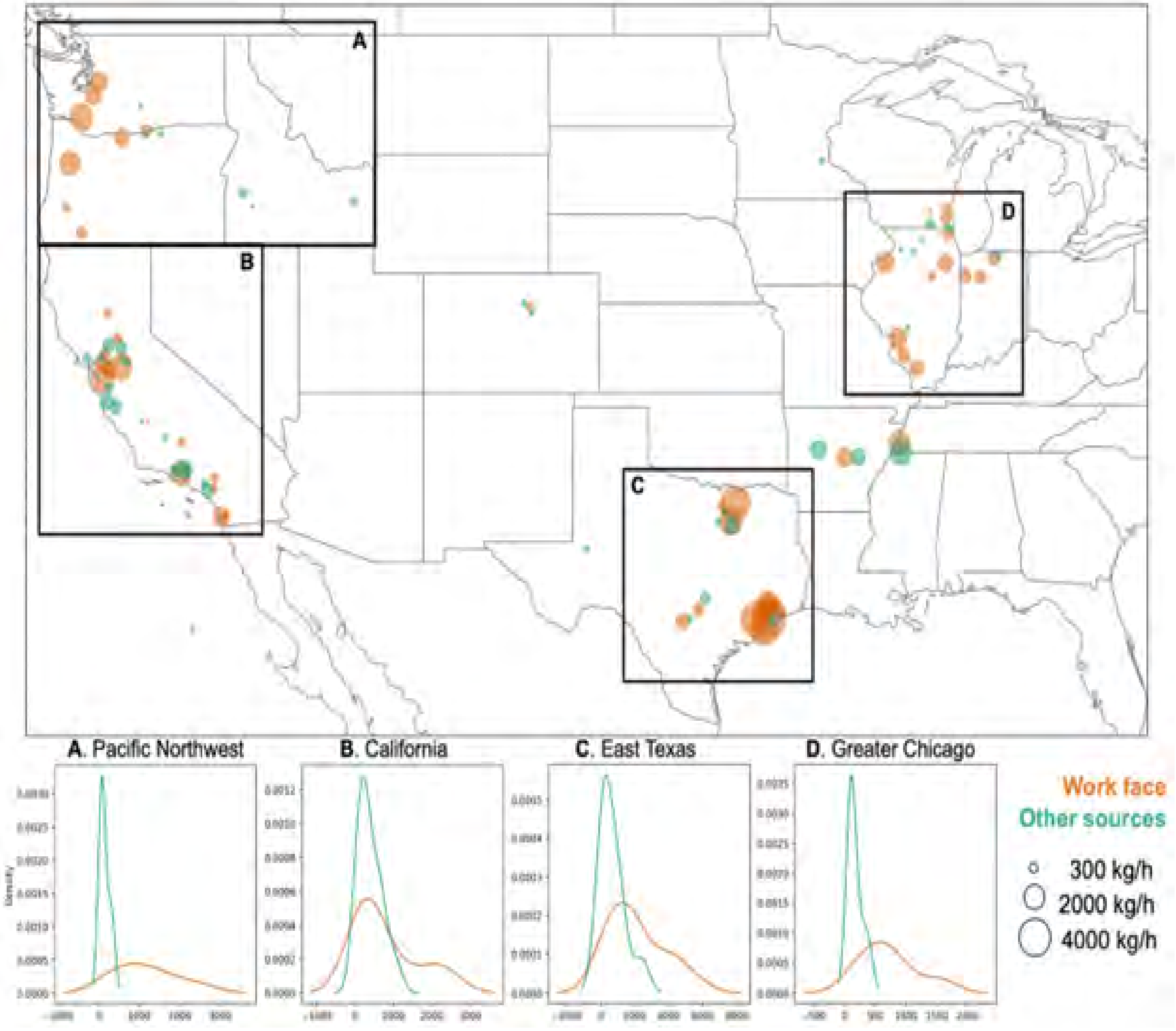
Working Face Emissions

The working area is the key to emissions reduction



***"Understanding and Reducing Fugitive Landfill Emissions Using Combined Well Performance and Methane Air Monitoring"*, AWMA Measurements Meeting Sims et al., 2023**

Measurements from Aircraft

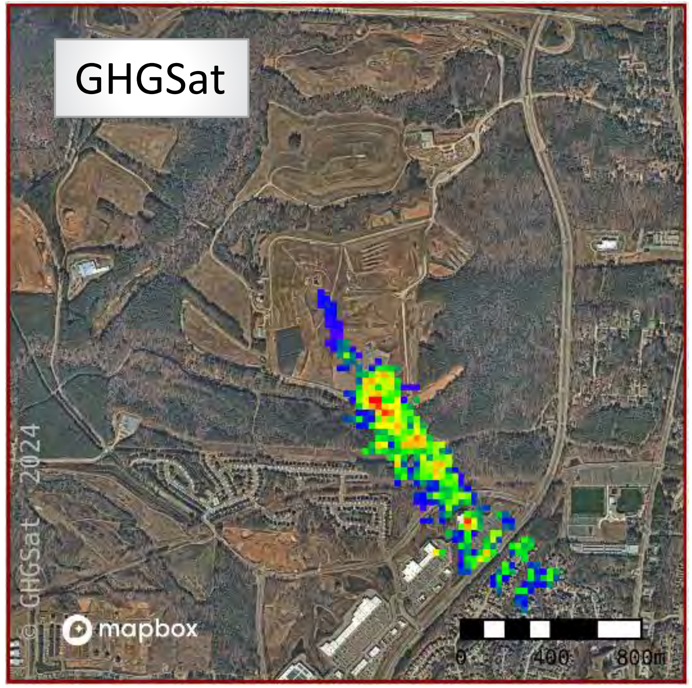


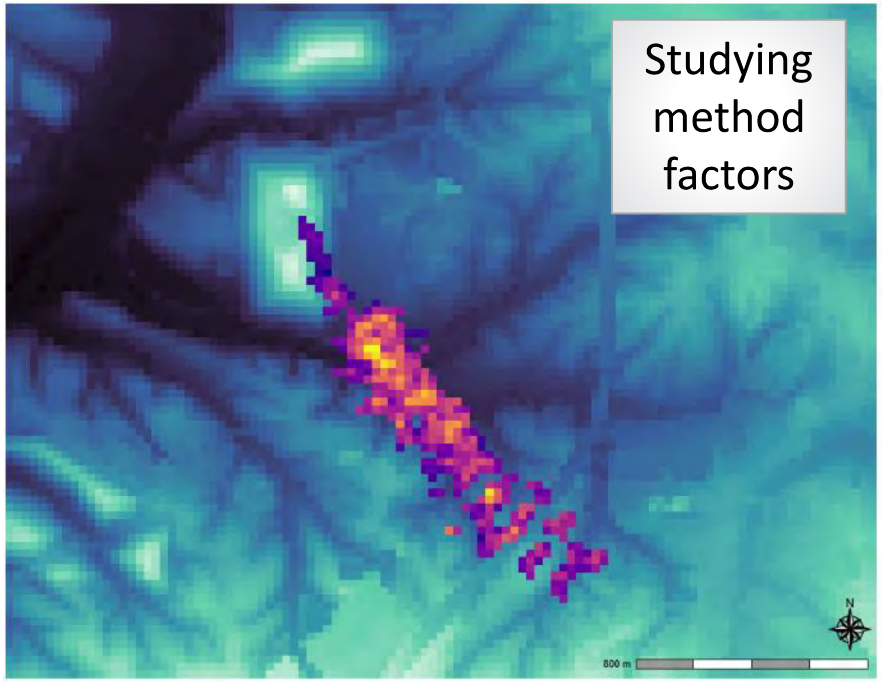
- Focus of 2nd manuscript (through partnership between EPA, Carbon Mapper, and NASA) is to investigate aircraft remote sensing data to attribute work face emissions to total fugitive landfill methane. Anticipate publication in ES&T in near future.
- Have conducted additional aircraft measurements at 14 landfills in NC, SC, and GA. Emission measurements occurred fall 2025 to further investigate landfill methane leaks and quantification.
- Time resolved GCCS data are needed along with landfill design and operating conditions that affect fugitive loss. Also need data on meteorological conditions including barometric pressure. Focus is to determine total fugitive loss versus amount of gas collected through GCCS.

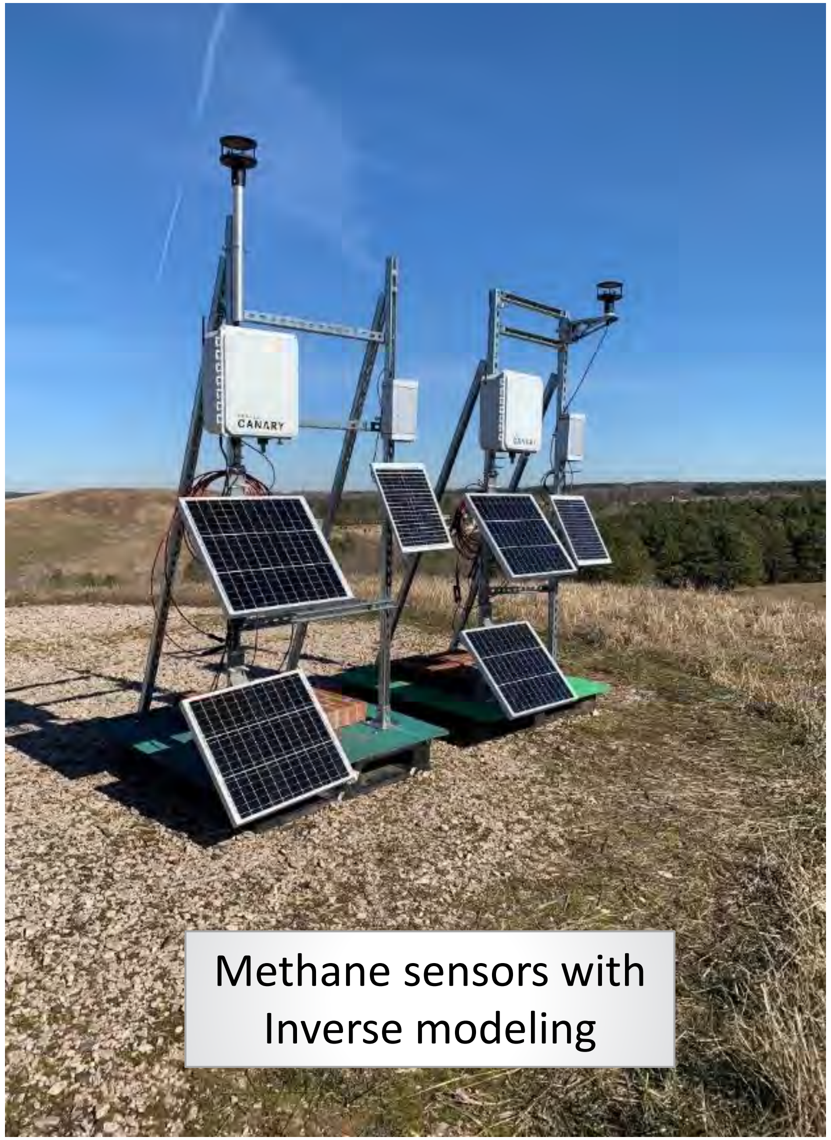
"Investigating Major Sources of Methane Emissions at US Landfills", Scarpelli et al, ES&T, accepted, in press).

Next publication will use data from fall 2024 measurements on landfills in NC, SC, and GA to further explore work face emissions.

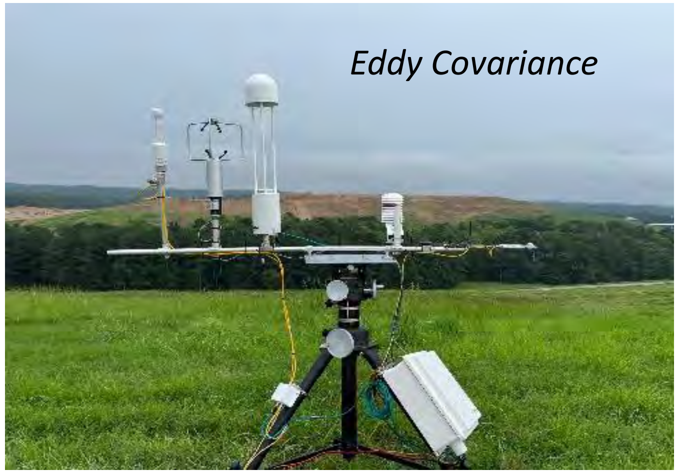
Multi-tier Method Comparisons at EPA South Wake Landfill Testbed







- 21 GHGSat observations to date
- 6 multi-unit sensor stations installed
- 8 wind measurement positions
- Future advanced wind field and Solar column methane measurements supported by parametrized CFD flow field modeling



Methane Point Sensor Trials at EPA ORD Test Range

- Cross platform reference comparisons with simulated methane plumes *(fixed placed sensors and UAV forms)*
- Conclusion: Methane sensors have come a long way in recent years. The hardware is there.

"An evaluation of commercial methane sensors using controlled release testing", Champion, W.M, et al (in preparation)

Commercial methane sensor testing at EPA RTP
August 2023 – January 2024

Handheld Methane Tunable Diode Lasers (TDLs)

ORD refers to this as manual column sensor emission assessment (MCSEA)

More established models

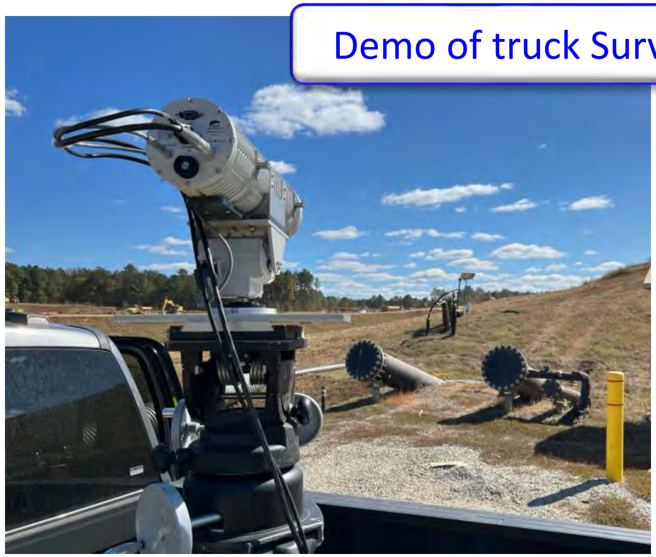
- Handheld TDLs are column sensors and variations of this tech are used on UAVs (downward looking laser)
- Handheld TDLs are mature and proven (for other applications) and have clear value for landfill fugitive emission assessment
- Collaborative near-term method development is needed

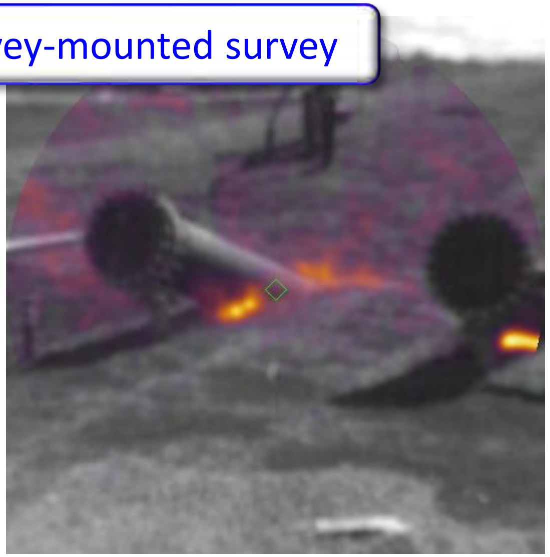
There are many sensors in this class.

What performance is needed?

Emerging Column Sensor Forms (e.g., QLM LiDAR)

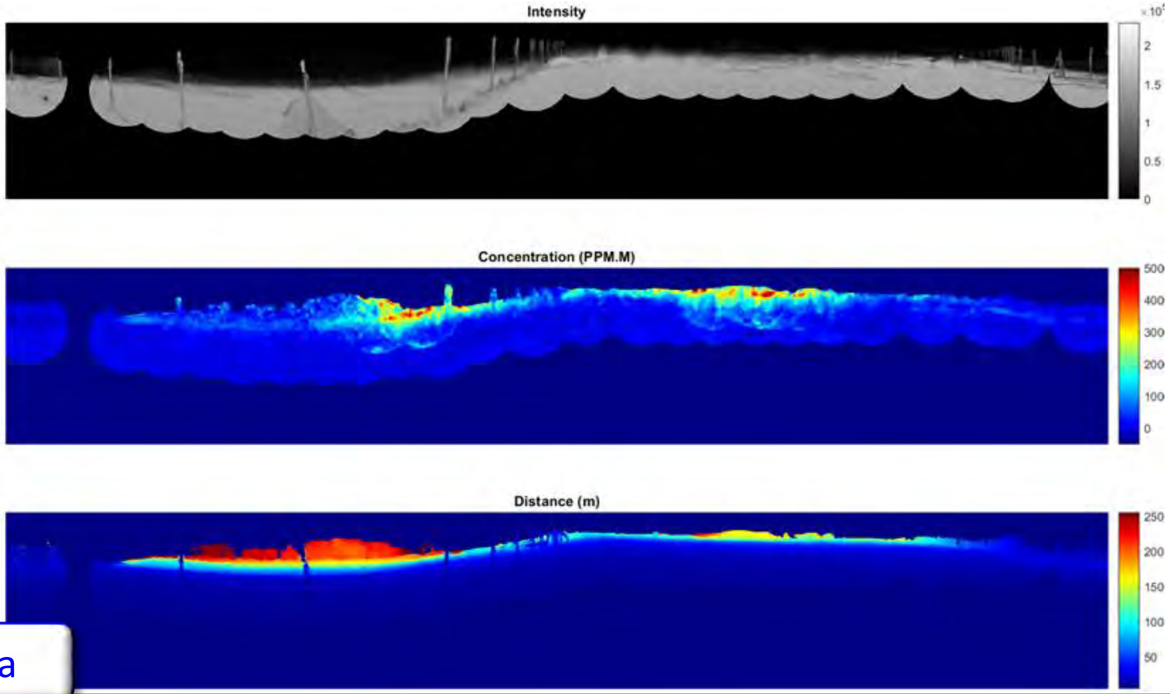
Demo of truck Survey-mounted survey





- A “step up” from TDLs but not as sensitive
- Companies like QLM and Bridger Photonics
- Deployed from trucks or aircraft (UAVs one day)
- Can provide 24-hr scanning for diurnal studies
- These data are from QLM pilot on 10/17/24
- Can quantify (with proper wind field data)

Demo of continuous scanning of large area



Added Value of Any UAV-based Approach

UAV surveys can produce valuable metadata that can be used by the operators to reduce emissions. Here are examples of aerial imagery showing problematic cover conditions.

Adapted from 2024 Sniffer Services and Solutions 20240809.pptx (with permission)

Time-resolved GCCS data (three types)

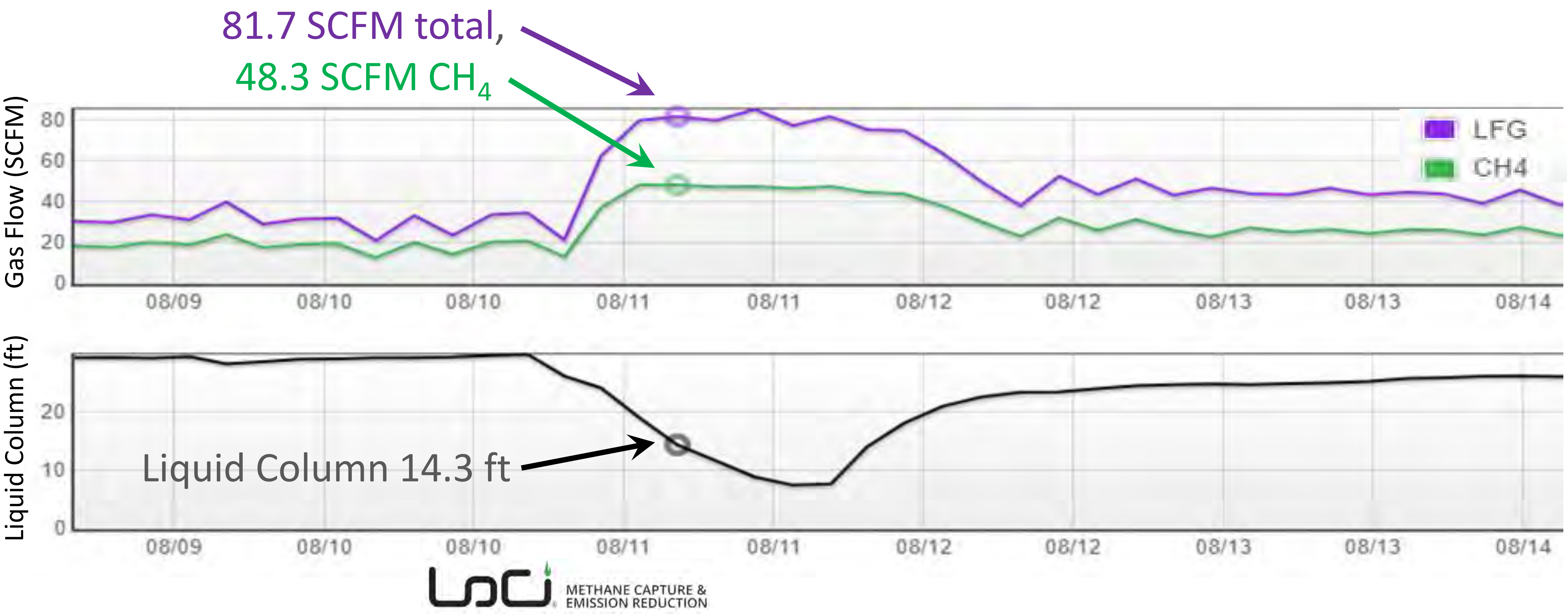
Aggregate - one location
(at flare)

Partitioned - few locations
(on header pipes)

Each well - many locations
(auto well-tuning)

Individual well data can add value

Improvement in gas collection during flooded well pump out



Environmental Research & Education Foundation (EREF), Summit on Quantification of Landfill Emissions, October 24- 25, 2023, Chicago IL, https://cfpub.epa.gov/si/, Record ID: 359503.

EPA Landfill STAR Awardees

University of Wisconsin, Jamie Schauer (Lead)

Analysis of Continuous Monitoring Data with Inverse Atmospheric Models to Improve Landfill Gas Emissions Data and Elucidate Drivers of Emissions

Five STAR Awards
4 regular, 1 early career
Total funding of $4,592,430

University of Delaware, Paul Imhoff (Coms Lead)

Evaluation and Control of Emissions from Municipal Solid Waste (MSW) Landfills: Direct Measurement and Modeling

Colorado University – Boulder, Mike Hannigan (Lead)

Integrating Measurements Across Platforms to Feasibly Assess Emissions and Mitigation of Methane and VOCs from Landfills

University of California - Berkeley, Dimitrios Zekkos (Lead)

Next-generation landfill monitoring: a multi-scale approach to measuring emissions for evaluating and financing interventions

Miami University, Jiayu Li (Early Career)

Integrating Multi-source Data for Landfill Methane Emission Quantification

For additional information on EPA STAR, please contact Serena Chung <chung.serena@epa.gov>

Next Steps

- Will be working with EPA colleagues, industry, NGOs, academia and others to evaluate what next generation measurement (NGEM) technologies work best for landfill leak detection and quantification of methane (mass emission rate).

- A multi-tier NGEM approach is likely with collection and evaluation of performance data where technology is deployed at landfills

- NGEM advancements from oil and gas applications have accelerated the pace of NGEM technology for landfill applications - However, we recognize unique characteristics and variability across landfills that make leak detection and quantification of methane more difficult.

- STAR efforts will provide landfill specific data for 9 landfills evaluating different NGEM technologies

- We thank Carbon Mapper, CARB, ECCC, EDF, EREF, NASA, industry, and others helping to advance detection of landfill leaks and methane quantification technologies that are resulting in near term carbon reduction at US landfills.

November 27, 2024

Via Electronic Transmission: www.regulations.gov
Vasco Roma
Office of Atmospheric Protection, Climate Change Division
Office of Air and Radiation
U.S. Environmental Protection Agency
roma.vasco@epa.gov

Re: Use of Advanced and Emerging Technologies for Quantification of Annual Facility Methane Emissions under the Greenhouse Gas Reporting Program; Docket ID No. EPA-HQ-OAR-2024-0350

Waste Management ("WM") is pleased to provide the following comments on the U.S. Environmental Protection Agency's ("EPA's" or "the Agency's") *Request for Information for Use of Advanced and Emerging Technologies for Quantification of Annual Facility Emissions Under the Greenhouse Gas Reporting Program;* Docket ID No. EPA-HQ-OAR-2024-0350 (hereinafter, the "RFI") at 89 Fed. Reg. 77,510 (Sept. 23, 2024).

WM is North America's leading provider of comprehensive environmental solutions. Previously known as Waste Management and based in Houston, Texas, WM is driven by commitments to put people first and achieve success with integrity. The company, through its subsidiaries, provides collection, recycling, and disposal services to millions of residential, commercial, industrial, and municipal customers throughout the U.S. and Canada. With innovative infrastructure and capabilities in recycling, organics processing, and renewable energy, WM provides environmental solutions to, and collaborates with, its customers in helping them pursue their sustainability goals. WM has the largest disposal network and collection fleet in North America, is the largest recycler of post-consumer materials, and is the leader in beneficial use of landfill gas, with a growing network of renewable natural gas plants and the most landfill gas-to-electricity plants in North America. WM's fleet includes over 12,000 natural gas trucks — the largest heavy-duty natural gas truck fleet in the industry in North America.

WM was the first U.S.-based company in the solid waste management utilities sector to have near-term Scope 1 and Scope 2 targets validated by the Science-Based Target Initiative, in line with limiting global warming to 1.5 degrees Celsius. As such, we are actively implementing emissions reduction plans to reduce our emissions by 42% by 2031, increase the beneficial use of landfill gas to 65% by 2026, and make continued investments in landfill gas collection and measurement systems.

To support our sustainability goals, we need to measure and manage our emissions. WM is exploring several methods of measuring landfill emissions more accurately and easily, and we have welcomed various stakeholders to work with us to help identify solutions. WM also is working with academics, regulators, non-governmental organizations, and measurement technology providers that provide satellite, aircraft, drone, fixed, and portable sensors and analytics services that support our journey towards having a comprehensive landfill emissions measurement system. Advancing measurement methods leads to more specific data that will enable us to target initiatives to capture landfill gas and reduce emissions.

For example, WM has engaged with several industry stakeholders to improve knowledge and data around landfill emissions measurements. In November of 2023, WM hosted a controlled methane release study at our Petrolia Landfill in Ontario, Canada. The study, which was funded by the Environmental Research & Education Foundation and conducted by researchers from St. Francis Xavier University, assessed a combination of existing and emerging technologies and methodologies for methane detection and quantification in a landfill environment. A number of commercial technology vendors as well as researchers from academia and Environment and Climate Change Canada (ECCC) participated in the study. This work built on past studies including ECCC research staff's deployment of emissions measurement technology at the WM's Petrolia and Twin Creeks Landfills.[1]

Finally, WM has been working cooperatively with the Agency for 15 years on implementation of and revisions and clarifications to the MSW Landfill GHG reporting requirements at 40 C.F.R. Part 98, Subpart HH ("Subpart HH"), of EPA's Greenhouse Gas reporting Program ("GHGRP").[2] Per Subpart HH, WM prepares emission estimates and reports annually for approximately 250 active and closed MSW landfills. WM is a member of the Solid Waste Industry for Climate Solutions ("SWICS"), which intends to publish and publicly share updates to its landfill emissions modeling tool in early 2025. WM looks forward to continuing our dialogue with the Agency around the use of this modeling tool as

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[1] A more detailed discussion of the findings from this study can be found in the National Waste & Recycling Association's ("NWRA") comment submittal to this RFI.
[2] EPA recently updated Subpart HH in a final rule entitled, *Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule,* 89 Fed. Reg. 31802 (April 25, 2024) ("2024 Subpart HH Revisions").

well as our engagement and findings on the use of advanced measurement and remote sensing technologies in detecting and quantifying landfill emissions.

SUMMARY AND BACKGROUND TO WM'S COMMENTS ON THE RFI

As discussed below, as well as in the comments submitted to this docket on behalf of the National Waste and Recycling Association ("NWRA"), our sector is well positioned to provide input on the use of advanced measurement detection technologies.[3] WM is working with over 20 different technology providers in the methane measurement space—including via drones, aircraft, satellites, fixed sensors, and portable meters—along with entities that provide unique analytical capabilities to assist us with data analysis. Our research and engagement to date, described below, reveals that although technologies are evolving quickly, they often yield inconsistent and inaccurate data based on the unique characteristics of landfill topography and operations. Accordingly, additional research and development is necessary before EPA can justify incorporating the use of advanced measurement technologies for purposes of reporting under the GHGRP or altering the existing modeled approach (*i.e.*, reducing collection efficiency values within Equations HH-7 and HH-8) under the GHGRP.

WM conducted a site-specific Comparative Methane Measurement Study ("Comparative Study") in partnership with an outside consultant and several technology vendors, wherein various types of emerging advanced measurement technologies were applied and compared across numerous WM sites. WM compared satellite measurements to emissions quantified under the pre-2024 GHGRP method, using the collection efficiencies required by the 2024 Subpart HH Revisions, and using SWICS Methodologies. The comparison showed mixed results in terms of correlation, including that some sites would be overreporting, and some underreporting relative to both GHGRP methods. As a general matter however, the 2024 Subpart HH Revisions tended to result in more overreporting than underreporting when compared to data derived from emerging measurement technologies. In addition, of the three methodologies, SWICS was most consistent with data derived from satellite measurements, and is most responsive to real-time operational observations at municipal solid waste landfills. WM believes it would be helpful and responsive to the questions posed by EPA in this RFI to provide details, learnings, and other insights from the Comparative Study.

Description of WM Comparative Methane Measurement Study

The Comparative Study, which began in 2022, analyzed data collected across 25 WM landfill sites of varying geography throughout the United States, as depicted on the map below.

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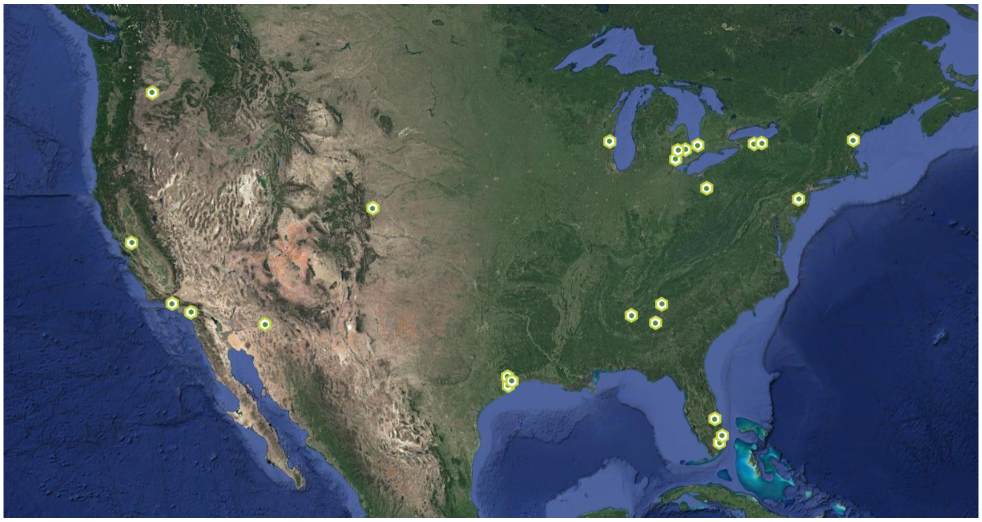
[3] WM contributed to, supports, and incorporates by reference the comment submitted to this RFI on behalf NWRA



Monthly observations were made at sites in different geographic locations, while seven primary sites were observed on a quarterly basis using various contracted and open-source ground and aerial technologies, including:

1. TROPOMI;
2. Commercial Satellite;
3. EMIT;
4. Carbon Mapper;
5. Aerial Mass Balance;
6. Unmanned Aerial Vehicles (also known as Drones);
7. Surface Emissions Monitoring ("SEM") using Method 21;
8. Tracer Correlation technology; and
9. Metal Oxide Fixed Sensors.

These technologies captured the following number of measurements between February 2023 and October 2024:

Sensor	Site coverage	# measurements
TROPOMI	25	15K
Commercial Satellite	25	869
EMIT	8	23
Carbon Mapper Aircraft	9	326
Aerial Mass Balance	8	57
Drone	4	738
SEM	25	1.7M
Tracer Corr	5	88
Metal oxide ground sensor	7	67M

WM aimed to evaluate the relative accuracy, reliability and scalability of technologies for landfill application and build data management aggregation and analytics systems to track emissions and mitigation responses, with the ultimate goal to better correlate measured and modeled data in the long-term. As a result of the Comparative Study, WM gained insights on how to best analyze trends and correlations in aggregated data from both WM-contracted and public sources. These learnings are poised to improve WM's find-and-fix approach to fugitive emissions in the short-term, and to inform research and development of advanced measurement technologies to quantify emissions for purposes of the GHGRP in the long-term.

Objectives of this Comparative Study were to evaluate various remote methane measurement technologies to determine their capabilities, including:

- **Localizing Emissions.** Identifying the physical location of emission sources to facilitate remediation and understand root causes.
- **Quantifying Emissions.** Determining mass emission rates to compare to model and inventory values and gauge emissions mitigation actions.
- **Evaluation and Deployment.** Comparing methods with whole landfill measurements to understand what combination of approaches is accurate and scalable; developing and assessing best practices to operationalize information for mitigation.

Based on WM's intensive deployment and analysis of the various technologies and the resulting outcomes, we speak with experience and understanding of both the opportunities and challenges of applying emerging technologies to the quantification of annual emission estimates. At this time, WM believes there are significant limitations to the use of emerging technologies for the quantification of emissions, based on challenges in detection, attribution and quantification driven in large part by the unique characteristics of municipal solid waste landfills and the lack of standardized methodologies to effectively address those challenges. To be clear, WM is heavily invested in finding technically and economically feasible and scalable solutions. We are collaborating with EPA, state agencies, technology vendors other industry partners and eNGOs through controlled release studies, quantification and localization methods development and technical papers. Although the technologies show promise, there is much work yet to do before measurement can augment or replace current methods for emissions estimation.

GENERAL COMMENTS:

WM's initial learnings from the Comparative Study are as follows:

- **There is no silver bullet, one-size-fits-all approach**. Some combination of measurement approaches that capture temporal variability in emissions and provide reasonably accurate quantitation will be needed.

- **Technologies developed and used for the oil and gas sector are not directly transferrable to landfills.** Fixed sensors and drone flux approaches show promise. However, quantification and localization needs additional development and study.

- **Satellite technologies currently present an irreconcilable level of uncertainty**.
    - Repeat measurements are necessary for accurately identifying emission sources, uncovering opportunity to improve gas collection, and verifying the effectiveness of corrective actions.
    - During a study period in October and November 2024 at the 7 pilot sites, 10 detections were made by a satellite provider. WM worked extensively with operators on site to identify possible ground sources for the emission detections. In one case, the plume location was determined to be an unlikely source of emissions because it was in an excavation area with no waste in place. In another case, the plume had multiple potential sources even though only one was identified by the satellite provider.
    - The uncertainty for satellite-based emission source location detections ranges from tens to hundreds of meters, depending on wind speed.
    - The uncertainty reported by providers for satellite emission quantifications averages 44% based on 551 measurements collected in 2024.

- **Understanding the status of the landfill is key to understanding the potential sources of emissions**. This includes:
    - Landfill gas collection and control system status and construction activity.
    - Cover type and distribution (current, high resolution optical imagery can be very useful in this context).
    - Local meteorological data (wind speed, direction, atmospheric pressure).
    - Reliance on either global or regional wind data as opposed to local wind data can significantly impact the calculated emission rate.
    - Uncertainty and wind speed are correlated.

- **Executing studies combining multiple measurements is complex, expensive and challenging.** We need to find more ways to collaborate and leverage expertise and reduce the cost of this work.

- **2023 EPA reported emissions compared to measured emissions at 25 sites are highly variable.**

- **To inform emission estimates more research still needed on:**

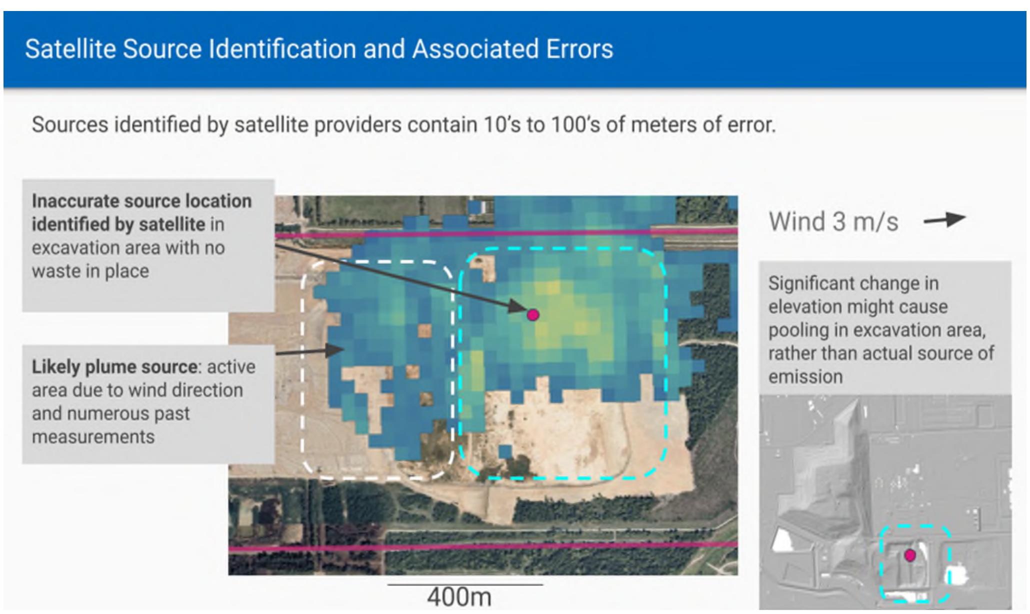
- How to address emissions variation throughout the day/night as most measurements are taken during clear daytime conditions?
- How to weight episodic (construction, maintenance) events?
- How to reconcile differences in measurements of emissions from different technologies?

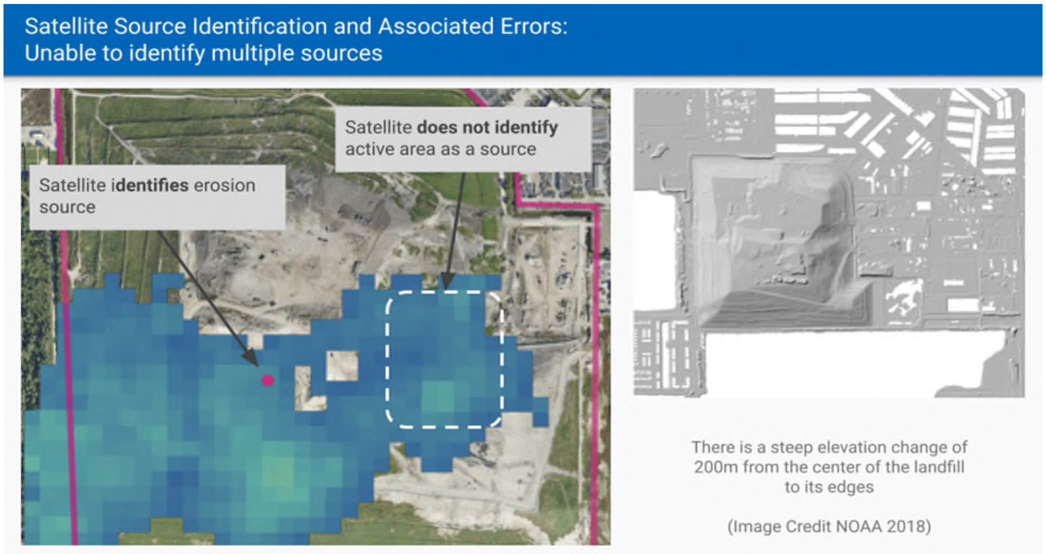
SPECIFIC COMMENTS:

The following comments pertain to more specific learnings from the Comparative Study, all of which are relevant to better understanding the capabilities of advanced measurement technologies, and inform their use in detecting, quantifying, and annualizing emissions for purposes of reporting under the GHGRP.

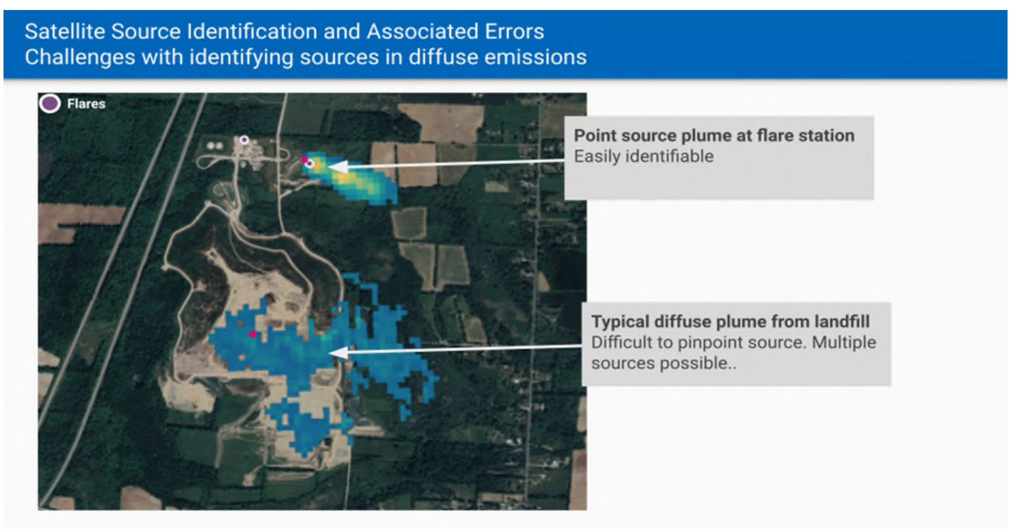
Localization and Attribution

WM is working on the development of an advanced method for pinpointing the physical locations of methane emission sources. The company has also assessed the capabilities of measurement data providers to identify emission sources at landfill sites, focusing not just on detecting emissions but on tracing their specific origins within the complex landfill environment. In doing so, WM has found that vendors have limited ability to provide accurate source locations, likely due to a combination of factors unique to landfills that create uncertainty, such as wind data; landfill gas behavior (*i.e.*, the tendency to pool in low-lying areas), cover type, and complex topography as shown in the figures below.





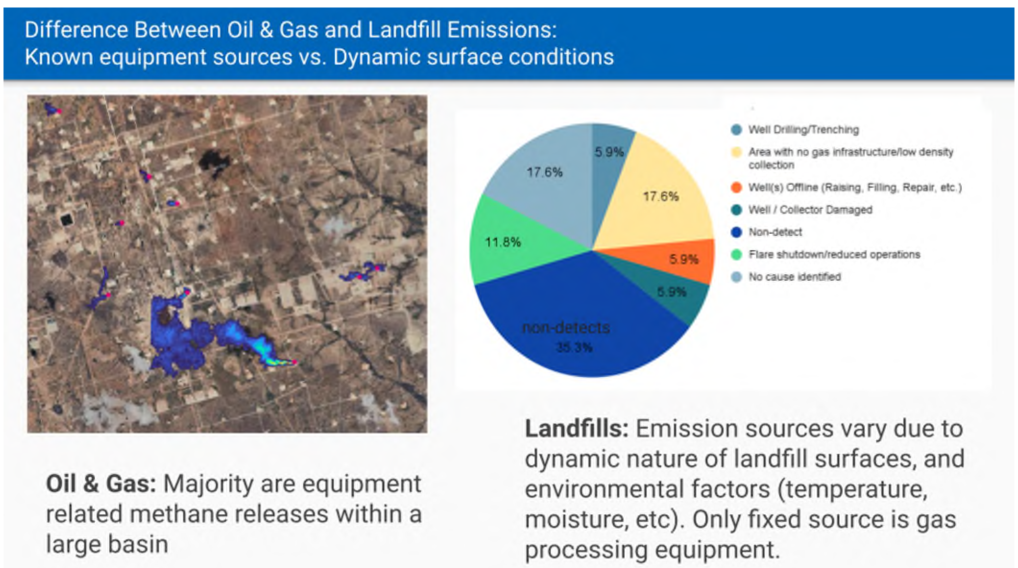
The inability of vendors to accurately localize and attribute sources is due in part to the complexity of landfill emissions. Landfill gas plumes behave sporadically due to the composition of landfill gas, the topography of landfills, the atmospheric and meteorological conditions at the source, the relevant cover type, and other interferences such as physical objects or vegetation. The following figure presents the visual differences between point source and diffuse plumes to illustrate the complexities associated with localizing diffuse plumes from landfills:



Moreover, by the very nature of landfills, emissions sources are difficult to localize due to constant construction. For example, the working face/working area moves to accommodate additional waste tonnage. Satellite or aerial measurements and images captured during the period of time when the working face/working area shifts will not accurately localize emissions from the working face/working area.

Quantification of Emission Rates

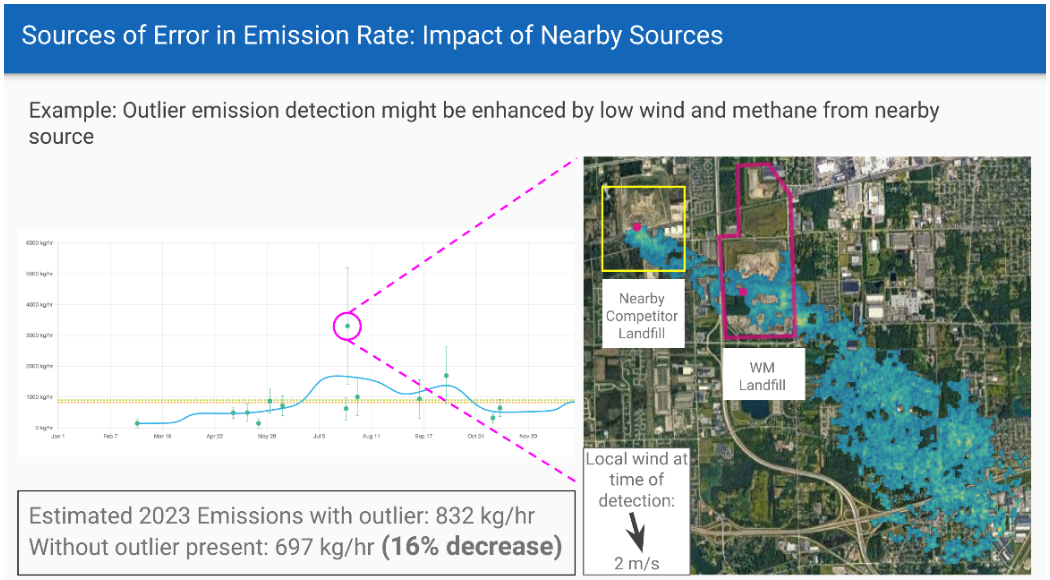
There are numerous complexities associated with detecting and quantifying landfill gas emissions that complicate the application of advanced technologies to sector emissions.[4] Many of these complexities are unique to landfills, and are not applicable in the oil and gas sector. These complexities begin with the composition of landfill gas, which is heavier than air and released at near atmospheric pressure. The behavior of landfill gas plumes is highly influenced by topography, meteorological conditions, atmospheric conditions, and other site-specific conditions, making it unpredictable and therefore challenging to detect and quantify. As a result of dynamic surface conditions, landfill emissions can be attributable to various sources, as identified by WM's own study and shown in the figure below:

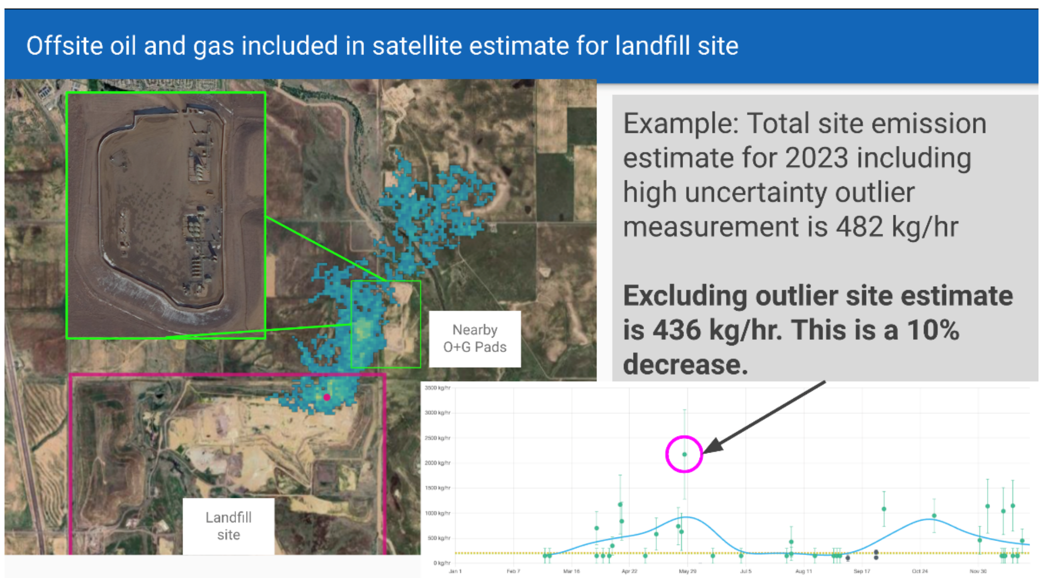


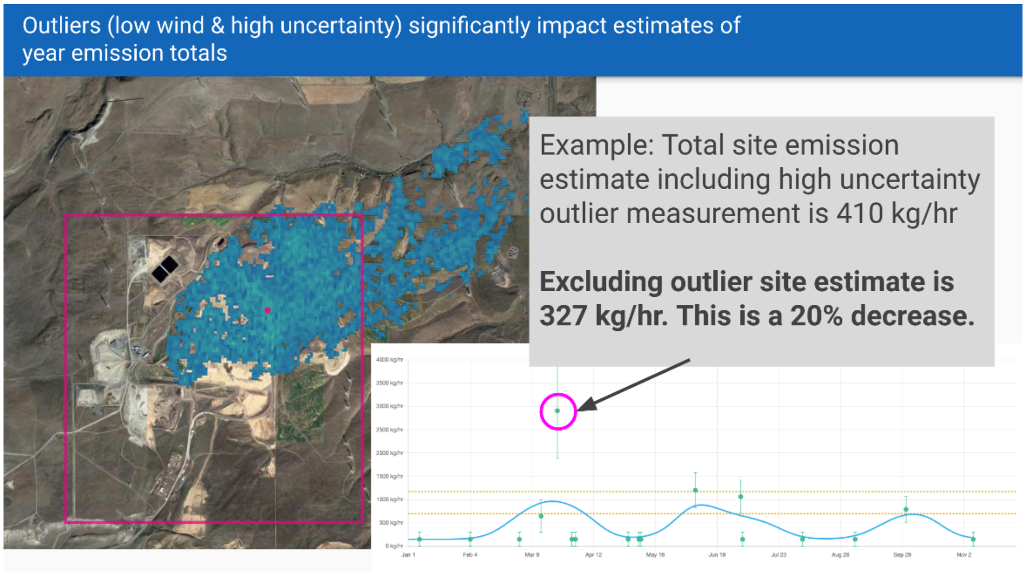
Thus, while flux planes from drones have been proven effective in quantifying emissions from a known point source, the vendors used by WM was unable to effectively separate and quantify the multiple emission sources to produce an accurate and reproducible estimate of the whole site emissions. This is due in part to the aforementioned complexities inherent in the nature and structure of landfills and landfill gas emissions, but exacerbated by the fact that different advanced technology vendors apply unique and often proprietary methodologies and algorithms to their quantification processes and often cannot differentiate between landfill emissions and emissions from nearby sources. As a result, the datasets in the Comparative Study included highly uncertain outliers that significantly influenced the emission rates. In several examples,

[4] The complexities associated with landfill gas emissions are described more thoroughly in NWRA's comment in response to this RFI.

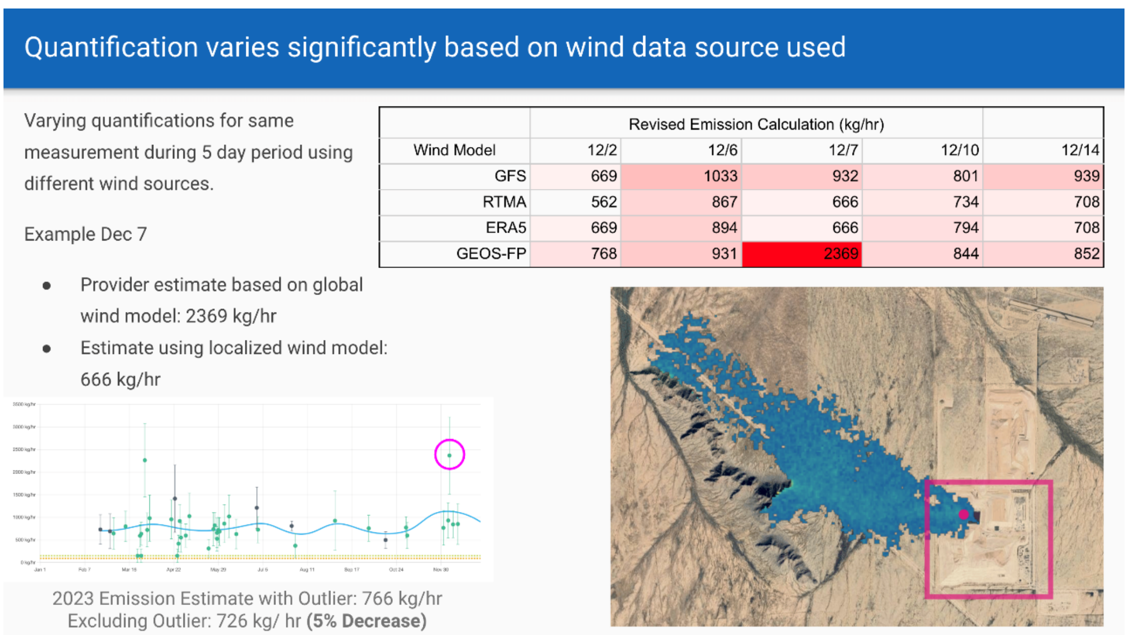
removal of the outlier caused emission estimates for the relevant sites to drop by 10% or more:





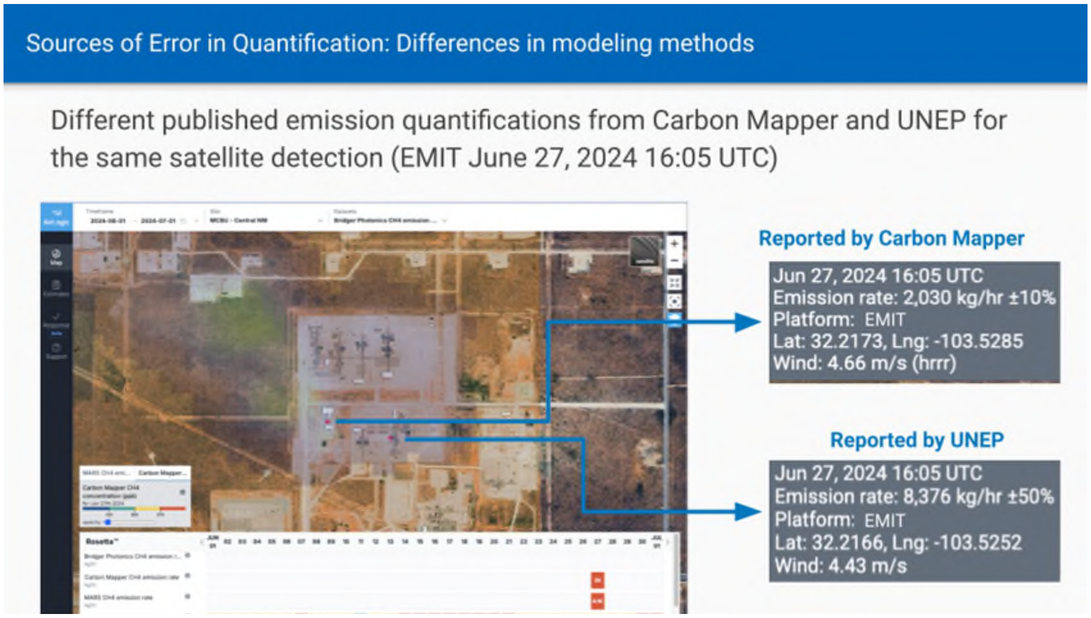


Relatedly, emission rates varied remarkably depending on the wind model integrated into the quantification algorithm.



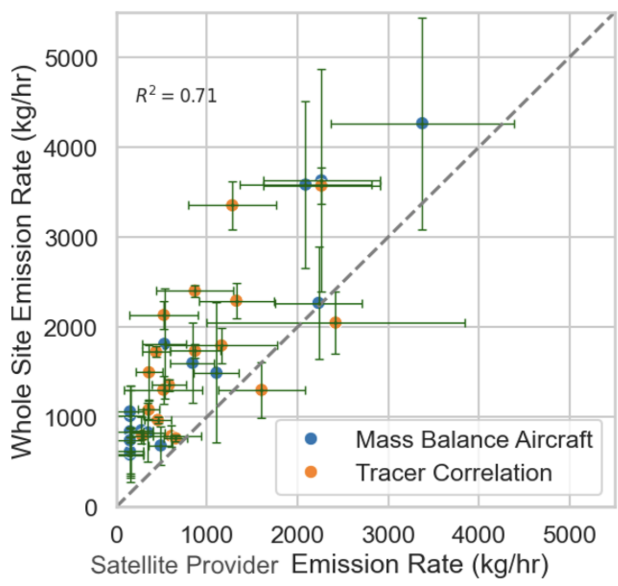
	Revised Emission Calculation (kg/hr)				
Wind Model	12/2	12/6	12/7	12/10	12/14
GFS	669	1033	932	801	939
RTMA	562	867	666	734	708
ERA5	669	894	666	794	708
GEOS-FP	768	931	2369	844	852

In the same respect, where different vendors apply their own quantification methodologies and algorithms, the estimated emission rates naturally differ, evidencing an irreconcilable lack of standardization in the quantification process.



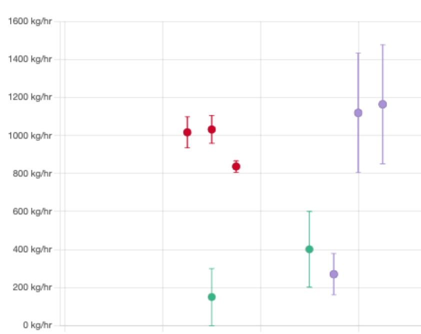
While the above figure provides evidence of an oil and gas facility with drastically different emission rates produced by different vendors, the results of WM's Comparative Study evidence the same issues. Drone flux planes and fixed sensors were unable to produce reproducible whole site emission quantification. In fact, more consistency was observed in the measurements collected using tasked 30-m resolution satellites, tracer correlation, and mass balance aircraft methods. Whole site emission measurements using either aerial mass balance or tracer correlation were made at 9 landfills from June 2023 to Sept 2024.[5] The whole site measurements were found to correlate with emission rates from targeted satellite observations in the same month—although large uncertainties were present in all methods due to both temporal variation in measurements within the same month and the reported method uncertainty. The whole site emission estimates were found to be higher than the emission rates, on average, as shown in the figure below:

[5] WM used the methodologies outlined in Varon et al., *Quantifying methane point sources from fine0scale satellite observations of atmospheric methane plumes*, 11 Atmos. Meas. Tech. 5673–86 (2018).



Despite the correlation when considered in aggregate, results from different technologies at a single landfill varied dramatically from day to day, while the collected volume of landfill gas remained consistent. The dramatic variation in point-in-time measurements within days increases the frequency needed to effectively extrapolate measurements to a reliable annual estimate.

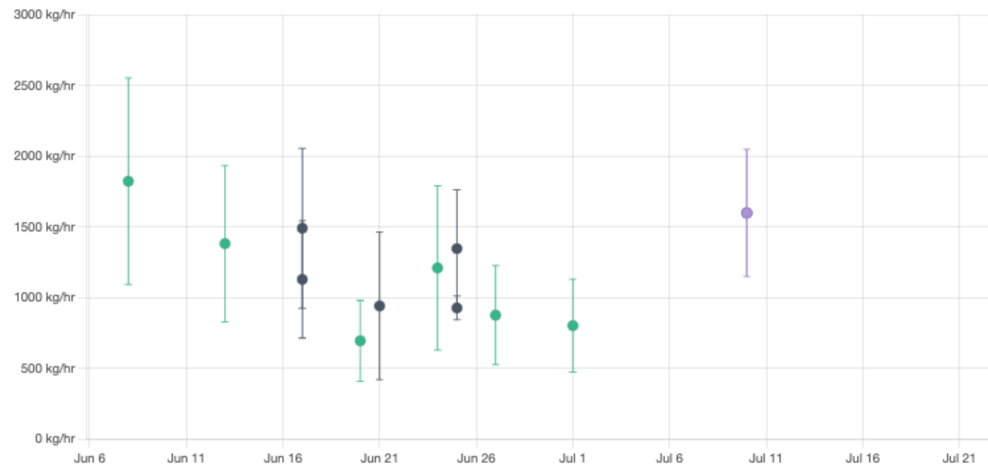
Example Measurement Comparison at Landfill A:



The figure on the left above depicts the measurements using tracer correlation (red), aerial mass balance (purple), and commercial satellite (green).

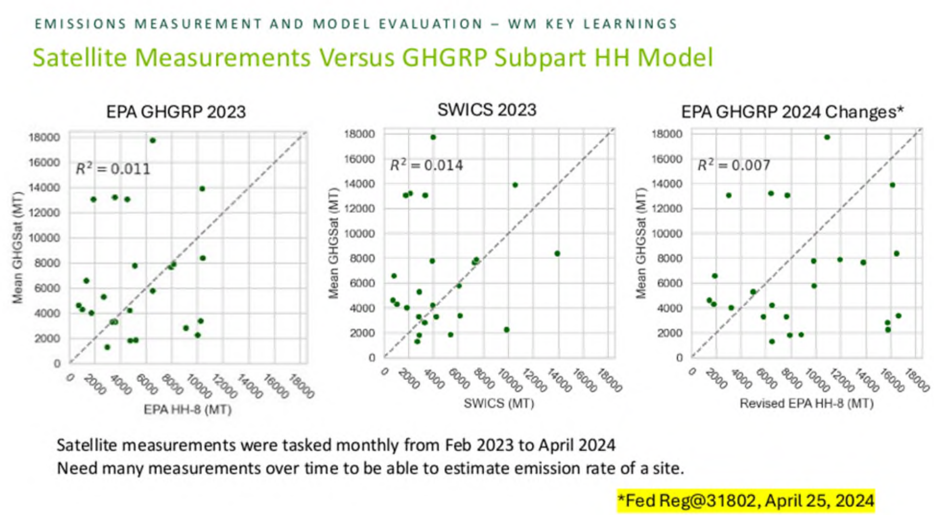
At another landfill, Carbon Mapper emission rate estimates were compared with commercial satellite and aircraft mass balance measurements. The results were more consistent, but uncertainties of 50% were common.

Example Measurement Comparison at Landfill B:



The figure above depicts commercial satellite measurements (green), Carbon Mapper measurements (gray), and aerial mass balance measurements (purple).

As part of the Comparative Study analysis, WM compared quantification based on satellite measurements to reported emissions under the GHGRP. As evidenced in the figure below, limited correlation existed between the satellite measurements and the emissions reported under the GHGRP, indicating that satellite technologies are not yet poised for quantification and calculation of annual emission rates at this point in time. The depiction below shows that the 2024 changes to collection efficiency in Subpart HH of the GHGRP, when compared to quantifications based on satellite measurements, would tend to cause more overreporting using GHGRP methodologies as compared to the GHGRP methodologies applicable prior to the 2024 revisions. The figure also illustrates the strongest correlation between the satellite measurements and the SWICS methodology.



CONCLUSION

The results of WM's Comparative Study illustrate the challenges and current shortcomings of advanced measurement technologies, specifically in localizing and quantifying emissions at landfills. However, the findings highlight the potential for further development of these technologies to better understand landfill gas emissions, and in turn, quantify annual emission rates for the purpose of reporting under the GHGRP. Additional time is needed to research, develop, and standardize the methodologies and algorithms associated with these technologies. WM has partnered with EPA's Office of Research and Development to lead the way on this front. Indeed, based on data gathered from the Comparative Study, WM and ORD have co-authored a collaborative paper that is currently undergoing internal peer review before it will be transmitted for external peer review. The underlying study analyzes nearly 700 observations made using advanced measurement technologies across 60 active WM landfill sites to analyze calculated collection efficiency versus those reported under the GHGRP. WM believes that this comprehensive paper will better inform the current understanding of both landfill gas emissions and advanced measurement technologies, based on data derived from deployment of technologies at active landfills across the United States.

WM very much appreciates the Agency's consideration of these comments. Should you have any questions about this letter, please contact me at abaniste@wm.com.

Very truly yours,

Amy Van Kolken Banister
Senior Director of Air Programs
Environmental Management Group

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11-10-2025

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California Environmental Quality Act Compliance

The ISOR claims that the proposed amendments are exempt from the California Environmental Quality Act ("CEQA"), citing multiple categorical exemptions, and also referencing that CARB has an approved certified regulatory program. CARB has, however, in the process ignored that the California Legislature has imposed additional CEQA obligations that apply to the proposed amendments to the Landfill Methane Rule.

Public Resources Code section 21159 states:

> An agency listed in Section 21159.4 shall perform, at the time of the adoption of a rule or regulation requiring the installation of pollution control equipment, or a performance standard or treatment requirement, including a rule or regulation that requires the installation of pollution control equipment or a performance standard or treatment requirement pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), an environmental analysis of the reasonably foreseeable methods of compliance. In the preparation of this analysis, the agency may utilize numerical ranges or averages where specific data is not available; however, the agency shall not be required to engage in speculation or conjecture. The environmental analysis shall, at minimum, include all of the following:
>
> > (1) An analysis of the reasonably foreseeable environmental impacts of the methods of compliance.
> >
> > (2) An analysis of reasonably foreseeable feasible mitigation measures.
> >
> > (3) An analysis of reasonably foreseeable alternative means of compliance with the rule or regulation.
> >
> > (4) For a rule or regulation that requires the installation of pollution control equipment adopted pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), the analysis shall also include reasonably foreseeable greenhouse gas emission impacts of compliance with the rule or regulation.

The proposed amendments require the installation of air pollution control equipment, impose an increased performance or treatment standard relating to landfill gas. Moreover, Public Resource Code section 21159 specifically calls out that regulations adopted pursuant to the Global Warming Solutions Act are included as regulatory proposals that are to be analyzed under that section.

While CEQA generally authorizes lead agencies to use categorical exemptions when appropriate, and authorizes agencies to rely upon certified regulatory programs when the rulemaking documents sufficiently cover the environmental impacts of a proposed regulation, the California Legislature has imposed specific requirements on CARB as one of the agencies listed in Public Resources Code section 21159.4 to analyze: (1) the reasonably foreseeable environmental impacts of the methods of compliance; (2) the reasonably foreseeable mitigation measures; and, (3) the reasonably foreseeable alternative means of compliance. None of that analysis appears in the rulemaking record for this regulation.

In addition, to avail itself of its certified regulatory program, the written documentation of the certified regulatory program must include mitigation measures to minimize any significant adverse effect on the environment of the activity. The rulemaking record in this proceeding is devoid of any such analysis. Accordingly, CARB cannot rest on its certified regulatory program because the current rulemaking record does not satisfy the requirements of Public Resources Code section 21080.5 as a alternative environmental analysis.