



November 10, 2025

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814
Submitted electronically via online comment docket

**RE: Waste Connections Comments on 45 day Proposed Landfill Methane Regulation
(September 23, 2025)**

Dear Ms. Langfitt,

Waste Connections (WCN) welcomes this opportunity to comment on the California Air Resources Board (CARB)'s proposed amendments to its Landfill Methane Regulation. We are thankful for the time and effort CARB staff have put forth in formulating these proposals, and in engaging in dialogue with local governments and the solid waste industry, including Waste Connections.

WCN commends the joint letter from the Solid Waste Industry and Local Governments ("Coalition") for your review. While the Coalition letter contains several technical and implementation questions that deserve to be heard and further refined, and WCN is a signatory of this letter, this letter's comments are focused on Section 95471(e) – Test Methods and Procedures.

WCN has participated in research for methane detection and quantification, both at its sites as well as through research initiatives. While a certified, consistent methodology for methane quantification remains elusive, several technologies do perform well in detecting methane. Specifically, WCN has used OTM-51 for compliance in several US States; more importantly, WCN uses a modified OTM-51 for compliance in a State with both

instantaneous and integrated surface emissions monitoring requirements. Given this experience in other locales, WCN believes CARB should approve for compliance those technologies which are already approved by other regulatory agencies for SEM compliance before any possible furtherance by CARB staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Dylan Smith". The signature is fluid and cursive, with the first name "Dylan" and last name "Smith" clearly distinguishable.

Dylan Smith
Waste Connections
Corporate Engineering & Sustainability Manager
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