



**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

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Clerks' Office  
Landfill Methane Regulation (LMR)  
California Air Resources Board  
1001 I Street, Sacramento, CA 95814

Dear Representative:

**Comments on CARB's "Proposed 15-Day Changes - Proposed Amendments to the Landfill Methane Regulations."**

Thank you for the opportunity to comment on the California Air Resources Board (CARB)'s *Proposed 15-Day Changes - Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills*. We appreciate CARB's efforts and leadership in advancing a better understanding of landfill methane emissions and identifying effective greenhouse gas (GHG) reduction strategies to achieve carbon neutrality.

The Los Angeles County Sanitation Districts (Sanitation Districts) are a confederation of 24 special districts providing wastewater and solid waste management services to approximately 5.5 million people in 78 cities and unincorporated areas of Los Angeles County. Our mission is to protect public health and the environment through innovative and cost-effective wastewater and solid waste management and, in doing so, convert waste into resources such as recycled water, energy, and recycled materials. The Sanitation Districts' solid waste management system currently provides about one-fifth of the countywide solid waste disposal needs through the operation of two sanitary landfills and two materials recovery/transfer facilities. In addition, the Sanitation Districts also manages four closed landfills and operates two active landfill gas-to-energy facilities that convert landfill gas (LFG) into renewable energy.

On April 2, 2026, CARB released its proposed 15-day changes to the Landfill Methane Regulations (LMR), which incorporate some of the public comments it received during the previous 45-day public comment period. The Sanitation Districts appreciate the operational flexibility provided in the 15-day changes. However, the Sanitation Districts would like to further offer the following comments on the proposed 15-day changes to the proposed LMR amendments for your consideration.

**General Comments**

The following are the Sanitation Districts' general comments on the proposed LMR amendments:

**Providing a Reasonable Timeline for Implementation**

As with the current LMR, the proposed amendments should be delegated to local air districts for implementation and enforcement. To prevent confusion and allow stakeholders adequate time to adjust, the Sanitation Districts urge CARB to promptly clarify the delegation process to local air districts and specify the relevant procedures, such as a memorandum of understanding or guidance, before the amended LMR takes effect.

### **Comments on Specific Proposed Amendments**

The following sections outline the Sanitation Districts' comments on specific issues related to the proposed LMR amendments:

#### **Section 95469 (a)(1)(B): Corrective Action Initiation and 10-Day Remediation Period**

The proposed amendments increase the time to initiate corrective action from 3 to 5 days. While the Sanitation Districts appreciate the added flexibility, we believe a 10-day period would allow sufficient time to evaluate site conditions and implement effective corrective measures. This change would also align requirements with existing federal and local regulations (U.S. EPA NESHAP Subpart AAAA and SCAQMD Rule 1150.1), which prioritize prompt corrective action and follow-up monitoring over strict initiation deadlines.

#### **Section 95469 (a)(4): Recurring Surface Exceedances – Assessment and Monitoring Requirements**

There is no change in the proposed 15-day text in this subsection from the previous 45-day version. The proposed amendments continue to require enhanced monitoring for recurring exceedances, defined as five exceedances for instantaneous and three exceedances for integrated monitoring.

As noted in the Sanitation Districts' November 10, 2025, comment letter, some subsequent instantaneous exceedances within the same 50,000-square-foot monitoring grid may not be related to one another. Exceedances that occur in the same location and show a consistent pattern should be considered recurring. If exceedances are not spatially correlated or do not indicate a continuing condition, they should be treated as new. The current wording does not clearly address this distinction, resulting in significant operational burdens and unjustified costs for landfill operators, with no meaningful environmental benefit.

The Sanitation Districts recommend that CARB refine this amendment to clearly define a recurring instantaneous exceedance within a surface gas monitoring grid. For example, a recurring event could be defined as five initial (excluding re-monitoring) instantaneous exceedances within a rolling 12-month period, with each exceedance within a 20-foot radius of at least two others in the same grid. This clarification would ensure compliance requirements are clear and achievable, and would promote confidence in the fairness and practicality of the regulation. This approach provides a technically sound basis for identifying recurring conditions by considering both exceedance frequency and spatial correlation. It distinguishes between localized issues and unrelated, dispersed exceedances within the same grid.

#### **Section 95469(c): Component Leak Monitoring – Positive Pressure Components**

There is no change in the proposed 15-day text in this subsection from the previous 45-day version. The amendments continue to require quarterly leak checks of components containing landfill gas under positive pressure, which are typically found at flare stations and energy recovery facilities. While leak checks and repairs at flare stations can generally be performed as required, repairs at energy recovery facilities often require shutdowns, interrupting the beneficial use of landfill gas. SCAQMD Rule 1150.1 permits component leak monitoring and repairs at energy recovery facilities during planned outages, recognizing operational constraints. Aligning CARB's requirements with this approach would promote regulatory consistency and operational safety, ensure effective leak management, and maintain the beneficial use of landfill gas. Therefore, the Sanitation Districts strongly recommend that flexibility be provided to energy recovery facilities to continue providing environmental benefits without putting them at a disadvantage.

**Section 95469(e)(1): Positive Pressure Corrective Action – Inclusion of Zero Pressure**

There is no change in the proposed 15-day text in this subsection from the previous 45-day version. As stated in the Sanitation Districts' November 20, 2025, comment letter, adding zero-pressure readings as a criterion for wellhead adjustments and enhanced monitoring provides no benefit and imposes unnecessary burdens on landfill operators. Zero wellhead pressure does not always indicate a system deficiency or loss of control; it may reflect proper system balancing under certain conditions. Attempting to correct zero pressure could result in overpulling a gas collector, leading to excessive vacuum, air intrusion, elevated oxygen levels, increased subsurface temperatures, and long-term system issues.

U.S. EPA NSPS Subpart XXX and SCAQMD Rule 1150.1 apply corrective actions only to actual positive-pressure conditions, not zero-pressure readings. Aligning Section 95469(e) with these regulations would provide consistency across agencies. The Sanitation Districts, therefore, recommend that CARB exclude zero-pressure readings from positive-pressure conditions. This would provide regulatory clarity and avoid unnecessary steps.

**Section 95469(e)(2): Recurring Pressure Exceedances**

The proposed 15-day changes require a collection system assessment within 30 days and additional monitoring if three positive pressure readings occur at the same well within 12 months. Short-term positive pressures often result from normal operations, such as barometric changes, condensate buildup, or routine wellfield adjustments, and do not indicate system failure or increased emissions. Requiring extended monitoring for such routine events would impose significant burdens. In addition, operators may unnecessarily increase collector vacuum to offset positive readings, which could lead to air intrusion, higher oxygen levels, higher wellhead temperatures, and reduced methane quality. The Sanitation Districts recommend that CARB allow flexibility in addressing pressure-related issues.

**Section 95469(e)(5): Wellhead Oxygen Monitoring**

This subsection requires wellhead monitoring and remedial actions to reduce the oxygen content in “interior wells” to less than 5 percent. As stated in the Sanitation Districts' November 10, 2025, comment letter, oxygen concentrations above 5 percent alone do not indicate a potential landfill fire or over-drafting. Landfill operators must balance gas collection system operations to maximize energy recovery while maintaining compliance. Overly restrictive oxygen limits would impose unnecessary burdens without providing environmental benefit.

For example, shallow interior wells within cover soils are designed to control surface emissions by applying a localized vacuum that draws air inward. These wells do not penetrate the refuse mass and may have higher oxygen concentrations due to their design and cover conditions. Air intrusion depends on these factors and cannot be fully prevented without reducing the effectiveness of emission controls.

In addition, the U.S. EPA recognized that this could be an issue; hence, they removed the operating standards for oxygen and nitrogen at gas collectors from the Municipal Solid Waste Landfills New Source Performance Standards (NSPS) and Emission Guidelines (EG), allowing operators to implement site-specific landfill gas control measures to limit surface emissions and control subsurface gas migration. Therefore, the Sanitation Districts strongly urge CARB to impose oxygen concentration limits only on interior wells that extend into refuse and have temperature readings above 131°F, rather than on all interior wells. This approach would focus on wells with actual issues and avoid unintended consequences to environmental protection.

**Section 95469(e)(7)(A)-(B): Wellhead Parameter Trend Analysis**

The Sanitation Districts acknowledge CARB's intent to monitor interior gas wells for increasing temperature and oxygen trends that may indicate potential subsurface reactions. However, triggers based solely on relative increases do not account for normal variability in landfill gas system operation. Factors such as atmospheric pressure changes, routine wellfield balancing, condensate accumulation or removal, and temporary operational adjustments can affect readings without indicating a subsurface reaction.

A 20°F increase in the interior well temperature or a 2% increase in oxygen may warrant evaluation. However, such increases do not necessarily indicate a subsurface reaction or require enhanced monitoring if the resulting temperature remains below 55°C (131°F) and no other abnormal landfill conditions are present. For example, U.S. EPA guidance (EPA/600/R-21/285) identifies a typical operating temperature range for landfill gas wells of approximately 90°F to 131°F.

The Sanitation Districts recommend that enhanced monitoring not be required when wellhead conditions remain within the normal operating range. If the interior well temperature remains below 55°C (131°F) and the oxygen concentration remains below 5 percent, subsequent monitoring should confirm whether the observed trends are sustained or temporary fluctuations. Confirming sustained trends would better distinguish between normal variability and potential subsurface reactions, ensuring enhanced monitoring and assessments are implemented only when warranted.

**Section 95469(g)(1): Gas Collection System Pressure Monitoring**

This subsection requires establishing an LFG collection system pressure setpoint and mandates retuning all wells within 10 days of any change to the setpoint. While collection system pressure is vital for effective landfill gas management, the Sanitation Districts are concerned about the requirement to re-tune all wells within 10 days of any setpoint change. In practice, LFG systems operate within a defined vacuum setpoint range that is routinely adjusted to respond to changing field conditions and optimize performance. The setpoint range often changes as the wellfield expands and conditions evolve. Therefore, the vacuum setpoint range should serve as an operational tool rather than a regulatory compliance parameter.

Requiring full wellfield re-tuning for any setpoint adjustment, regardless of magnitude, would create unnecessary operational and financial burdens without meaningful environmental benefit, especially at large landfills. Therefore, the Sanitation Districts strongly urge CARB to allow site-specific operational setpoints and to base re-tuning requirements on actual wellhead conditions and system performance rather than triggers tied to setpoint changes. This approach aligns with performance-based operation and 40 CFR Part 63 Subpart AAAA, which emphasizes overall system effectiveness.

**Section 95471(k)(1), (2), and (3): Cover Integrity Assessment**

In these subsections, locations per acre are used to describe soil classification, gas profile, and saturated hydraulic conductivity requirements. However, in practice, surface gas emission monitoring typically uses the grid as the standard areal unit, as reflected in most of the proposed 15-day changes. To avoid confusion and maintain consistency with general practices, the Sanitation Districts recommend that CARB replace "per acre" with "per grid" where appropriate.

**Section 95471(o)(5): Monitor and Determine Carbon Monoxide Concentrations**

This subsection outlines sampling procedures and identifies U.S. EPA alternative methods for measuring carbon monoxide concentrations at landfill gas wellheads. In addition to the listed methods (e.g., U.S. EPA ALT-144 and U.S. EPA ALT-145), other alternatives, such as U.S. EPA ALT-143, can achieve the same monitoring

objectives. The Sanitation Districts recommend that CARB expand this subsection to include additional applicable alternative methods, such as U.S. EPA ALT-143.

In summary, the Sanitation Districts commend CARB staff for their proactive efforts to strengthen the Landfill Methane Regulation. We support CARB's initiatives to protect public health and the environment by reducing methane emissions and promoting safe, effective landfill operations. We appreciate the opportunity to participate in this rulemaking process and remain committed to providing input that supports practical and sustainable implementation.

Thank you for considering our comments. If you have any questions or require additional information, please call me at (562) 908-4288, extension 2126.

Very truly yours,



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