

Comment on 15-Day Notice – Landfill Methane Regulation Amendments

To: Clerk of the Board, California Air Resources Board, 1001 I Street, Sacramento, CA 95814

Cc: Quinn Langfitt; Anthy Alexiades

Dear Members of the Board,

I appreciate the opportunity to provide comments on the proposed amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills.

I strongly support CARB's continued leadership in strengthening methane emissions control and advancing California's climate goals. The proposed amendments, including updates to monitoring, operational, and control provisions (e.g., Sections 95462–95471), represent an important step forward.

1. Recommendation: Expand Regulatory Perspective to Include Source Reduction

While the proposed amendments appropriately strengthen methane monitoring and control requirements (including provisions such as Section 95464 related to surface emissions monitoring), I respectfully recommend that CARB further consider upstream source-reduction approaches as a complementary strategy.

Decentralized, closed-loop organic waste conversion systems can prevent organic waste from entering landfills, eliminate methane generation at the source, and reduce long-term dependence on landfill gas monitoring and control systems.

2. Recommendation: Recognize Closed-Loop Systems as Complementary Compliance Pathways

CARB may consider exploring pathways to recognize qualified closed-loop waste-to-resource systems as a complementary compliance or mitigation strategy within California's broader methane reduction framework.

Such systems can convert organic waste into usable outputs within 24 hours and operate with no wastewater discharge, no odor emissions, and minimal land footprint.

3. Recommendation: Support Pilot Programs

CARB may consider facilitating pilot programs to evaluate localized waste-to-resource conversion systems, integration with existing waste programs, and measurable methane reduction outcomes.

4. Recommendation: Address Workforce Capacity

Successful implementation depends on workforce capacity. CARB may coordinate with workforce agencies to support training programs, certification pathways, and alignment with circular economy infrastructure deployment.

Closing

Expanding the regulatory perspective to include preventative, decentralized, and workforce-supported solutions can strengthen the effectiveness of the Landfill Methane Regulation.

Sincerely,

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