



YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
1947 Galileo Ct., Suite 103 · Davis, CA 95618 · (530) 757-3650 · www.ysaqmd.org

April 16, 2026

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Comments on Proposed 15-day Amendments to the Landfill Methane Regulation

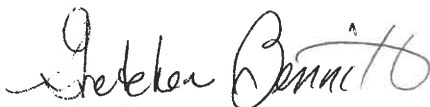
The Yolo-Solano Air Quality Management District (District) appreciates the opportunity to provide the following comments on the California Air Resources Board's (CARB) proposed amendments to the Landfill Methane Regulation (LMR):

1. CARB should ensure that the final Regulation on Methane Emissions from Municipal Solid Waste Landfills be aligned and consistent with federal regulations 40 CFR 63 Subpart AAAA and 40 CFR 60 Subpart XXX, and the portions of 40 CFR 62 Subpart OOO applicable to California landfills. CARB should also strive to have the LMR designated as "fully equivalent" to the Federal Emission Guideline under 40 CFR 60 Subpart Cf. The lack of congruency between this proposed regulation, the federal regulations cited above, and the current LMR, which will still be federally enforceable after the adopting of the proposed LMR, will lead to cumbersome landfill permits, long lead times, and lack of clarity at the facility level. Aligning the proposed LMR with the federal regulations would greatly simplify compliance for landfills and permitting by the Districts, and will help to minimize the additional costs that the LMR amendments place on landfills and Districts.
2. Section 95469(b) of the proposed amendments provides for the Executive Officer to notify an owner or operator of a remotely detected methane emission plume, and requires the owner or operator to take certain actions after being notified of the plume. This section should be modified to require simultaneous notification to the District in which the facility resides, should that District have an MOU with CARB to enforce the Regulation.
3. The proposed changes to section 95464(b)(1)(A)(2) introduce a relaxation of the requirement to continuously operate the gas control system by providing for 120 or 240 hours of annual downtime for gas control systems, up to unlimited downtime in the event of a power outage. Even short-term downtime of a gas control system is likely to result in surface emissions. Gas control systems are control devices that need to remain functional regardless of the reliability of utility power. It is common for stationary sources with control devices to be required to operate the control device anytime a process is in operation and make provisions for backup power in the event that a process cannot be shutdown. Additionally, the downtime allowance leaves a loophole for facilities with multiple control devices that should be closed. For example, a facility that collects 1500 cfm gas may have 3 x 500 cfm control devices. Under the proposed amendments operation of at least one control device which would not be effective gas collection, would not count against the 120 (or 240) hour limit because the gas control system is functioning partially, even if not effectively. The District recommends requiring continuous

operation of the gas control devices at a facility (based upon the total landfill gas generation capacity), with small hourly downtime allowances for maintenance, repair, and testing of gas control devices.

4. The regulation requires a variety of plans, including a component leak monitoring plan and a cover integrity monitoring plan, but there is not a specific review and approval/denial mechanism by the "Executive Officer" for the plans. This should be clarified or remedied.
5. Section 95464(c)(3) sets forth requirements for a "fire or elevated wellhead temperature" but does not define "elevated". If this is meant to mean any temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit), please clarify.
6. The word "robust" is used in section 95467 to describe the final cover. The word robust is not otherwise defined in the regulation, and should be replaced with an actual standard or metric.
7. The proposed additions and changes to the LMR add new requirements, plans, assessments, timelines, and dependent actions triggered under certain conditions. The regulation will be difficult for the regulated community and very tedious for a regulatory agency to monitor real-time or near real-time compliance, especially when monitoring triggers follow-up actions and timelines. If the District intends to enter into a new MOU with CARB to implement the LMR it will require a significant increase in staff time. For our three landfills, plus the two landfill gas control device operators, the District estimates needing a minimum of 0.25 to 0.40 FTE on the compliance side. The incorporation of the new LMR requirements into the local operating permits for these landfills will also require additional evaluation time for permitting engineers. These costs would most likely be passed onto the landfills themselves and the greater regulated community.

Best regards,



Gretchen Bennitt
Executive Director/APCO