



April 17, 2026

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

**RE: Recology Comments on 15-Day Proposed Landfill Methane Regulation**

Dear Quinn,

Thank you for the opportunity to provide comments on the 15-day proposed amendments to the Landfill Methane Regulation (LMR), released on April 2, 2026. We acknowledge and appreciate CARB staff's efforts to incorporate stakeholder feedback following the initial 45-day comment period and recognize the complexity of the issues involved.

Consistent with our mission, Recology continues to support California's efforts to reduce landfill methane emissions and the effectiveness of the LMR. However, despite some improvements in the 15-day revisions, several concerns raised in our prior comments remain unresolved. These outstanding issues raise serious concerns regarding the feasibility, safety, and implementation of the proposed regulation. Many provisions continue to remain impractical, overly prescriptive, or insufficiently supported by operational or technical justification.

The scope and complexity of the proposed amendments would benefit from further revision to ensure that the final regulation is both effective and implementable. Without further refinement, certain provisions of the rule are likely to create operational challenges, unintended consequences, and inconsistencies in implementation across facilities and jurisdictions.

As such, we offer the following updated comments and recommendations.

We remain committed to working collaboratively with CARB to ensure that the final regulation achieves its intended environmental benefits while remaining feasible and effective for landfill operators.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink that reads 'Julia Mangin' in a cursive script.

Julia Mangin  
Director of Sustainability & Government Affairs  
Recology  
[jmangin@recology.com](mailto:jmangin@recology.com)

## **Recology Comments on Proposed Landfill Methane Regulation**

### Gas Collection and Control System Requirements – Working Face

While CARB has made revisions to increase waste depth thresholds and add methane concentration triggers, the provision continues to require installation of specific gas collection infrastructure in active disposal areas. In addition, the interaction between this requirement and provisions governing wells that are temporarily offline creates operational uncertainty, particularly with respect to monitoring expectations at the active working face when wells are down. As previously noted, installation and operation of gas collection infrastructure in active working areas presents ongoing safety risks and operational challenges.

### Repairs and Temporary Shutdown of Gas Collection System Components

While changes have been made to increase the number of permitted offline wells (from 5 to 10) and broaden certain exemptions, the provision still enforces restrictions that could be impractical during major construction projects, system upgrades, or complicated operational situations. The existing provisions do not adequately address the practical challenges of managing landfill gas systems and might limit essential maintenance and construction work.

### Semi-Continuous Operation and Permanent Shutdown of the Gas

The requirements for semi-continuous operation and permanent shutdown remain highly prescriptive and operationally burdensome, particularly for closed landfills with declining gas generation. Despite some revisions, the framework continues to require extensive monitoring, prolonged demonstration periods, and detailed technical analyses that may not be feasible or appropriate for all sites. While we appreciate the reduced timelines in certain areas, the overall framework still imposes significant monitoring, demonstration, and operational burdens.

### Alternative Compliance Options

We appreciate CARB's clarification of review timelines and evaluation criteria. However, the requirement to resubmit previously approved Alternative Compliance Options (ACO) remains a significant concern. This provision introduces regulatory uncertainty and administrative burden without clear assurance of continuity for existing approvals. For facilities currently operating under approved ACOs, the lack of clarity regarding transition and reapproval creates potential compliance and planning challenges.

### Surface Emissions Monitoring Requirements

While CARB has made minor adjustments to corrective action timelines, the revised exceedance framework introduces additional requirements that may not be achievable under typical field conditions. The structure for addressing exceedances, including recurring exceedance provisions and associated monitoring requirements, does not adequately account for the localized and variable nature of landfill surface emissions. These requirements increase operational burden and compliance risk without clear evidence that they will result in improved emissions control.

### Recurring Pressure Exceedances & Well Head Monitoring

While some improvements have been made (e.g., adjusted timelines and thresholds), the requirements for corrective action, recurring exceedances, and enhanced monitoring remain overly prescriptive. The proposed framework does not fully account for normal operational variability, including transient pressure or temperature fluctuations. The requirement that a single exceedance of 131°F triggers enhanced monitoring is not reflective of normal operational variability and may result in unnecessary escalation of monitoring and corrective actions.

Transient temperature fluctuations can occur for a variety of non-systemic reasons and are not necessarily indicative of a broader performance issue. The current framework does not sufficiently distinguish between isolated events and sustained conditions requiring intervention. Monitoring requirements should focus on sustained or meaningful deviations and allow for operational flexibility.

### Effective Implementation and Coordination with Local Air Districts

Local air districts play a critical role in implementing and enforcing the LMR. However, there are ongoing concerns regarding their ability to effectively enforce several of the newly proposed provisions. In particular, air districts have expressed concerns regarding staffing, technical capacity, and overall bandwidth to implement the expanded monitoring, recordkeeping, and enforcement requirements included in the 15-day draft.

Absent sufficient resources, training, and clear implementation guidance, there is a significant risk of inconsistent enforcement across jurisdictions. This concern has not been resolved and is heightened by the additional complexity introduced in the 15-day revisions.

### Cover Integrity Monitoring Requirements

The newly proposed cover integrity monitoring plan requirements are more prescriptive than those included in the 45-day draft and represent a significant shift in approach. The increased level of prescriptiveness limits operator flexibility and does not adequately account for site-specific conditions, cover types, or operational practices.

This change introduces additional complexity and implementation burden without clear demonstration of improved environmental outcomes. This issue represents a departure from the previous draft and raises new concerns regarding feasibility and practicality.