

April 16, 2026

Quinn Langfitt, Staff Air Pollution Specialist
Short-lived Climate Pollutant Policy Section
California Air Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Comments Regarding Proposed Modifications (15-Day Changes) to the Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills

Dear Mr. Langfitt,

The Riverside County Department of Waste Resources (RCDWR) appreciates the opportunity to comment on the California Air Resources Board's (CARB) proposed modifications (15-Day Changes) to the amendments to the regulations on methane emissions from municipal solid waste landfills (referred to as the Landfill Methane Regulation [LMR]). We acknowledge the critical role CARB has played, and continues to play, in reducing methane emissions from landfills, and thereby reducing greenhouse gas emissions in California.

The RCDWR is a public agency whose mission is to protect public health and welfare through the efficient management of Riverside County's solid waste system. The active solid waste system currently includes five County-owned and operated landfills, along with thirty-three closed/inactive landfills also managed by RCDWR.

Considering the significant number of landfills managed by RCDWR, any changes to the LMR could have significant impacts on the limited resources dedicated to the efficient operation and maintenance of these landfills. Our landfills have long served Riverside County residents by providing a local, affordable and sanitary means of solid waste disposal. We are committed to continuing this service into the future.

The RCDWR reviewed the Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information (Notice) and the Proposed 15-Day Modifications to Proposed Regulation Order (15-Day Changes to the LMR). The RCDWR appreciates that many of the modifications in the 15-Day Changes to the LMR were responsive to the comments that CARB received prior to the November 20, 2025, public hearing, including those made by RCDWR. While RCDWR supports the overall goals of the LMR, we offer the following comments on specific proposed modifications.



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Section 95464 (b)(1)(A)2.

The 15-Day Changes to the LMR specifies that certain events are not subject to enforcement action. It is unclear to RCDWR if this means that these events do not count towards the downtime calendar year hour maximums or if these events should be excluded from such calculations.

RCDWR recommends that this section be modified to clarify whether these events are included or excluded from the yearly shutdown calculation.

Section 95469 (e)(3)

The 15-Day Changes to the LMR specifies assessment and/or correction action for landfill gas temperatures that exceed 55 degrees Celsius. In CARB's Notice, Number 84 provides rationale specific to this section of the 15-Day Changes to the LMR. Number 84 states "This change is consistent with federal regulations on well temperature". The RCDWR does believe that this statement is consistent with the federal regulations specified in 40 CFR Part 60 Subpart AAAA. Landfills that are subject to Subpart AAAA are required to perform corrective measures for temperature exceedances above 62.8 degrees Celsius.

Federal regulations have different landfill gas well temperature standards, depending on the status of the landfill. The RCDWR does not believe that it is accurate to broadly refer to federal regulations and apply a single landfill gas temperature threshold when differing federal regulations have differing landfill gas temperature standards.

RCDWR recommends that the LMR be updated such that the landfill gas temperature threshold and standard are the same, 62.8 degrees Celsius. This would match federal regulations for the larger, active landfills in California and would provide those landfill operators a less complicated operational pathway to compliance.

Closure

Thank you again for the opportunity to participate in the rule making process and comment on the 15-Day Changes to the LMR. RCDWR remains committed to the efficient use of Riverside County's resources for the benefit of the public we serve. The comments provided herein are intended to support that mission while ensuring practical and effective implementation of landfill methane reduction goals. If you have any questions or wish to discuss our comments further, please contact me at (951) 486-3200.

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Respectfully submitted,

Todd D. Shibata, P.E.
Principal Engineer

JG/AC/SC: tds

cc: Andy Cortez, Jeff Gow; RCDWR (via email)