January 24th, 2025

Liane Randolph

Chair

California Air Resources Board

Submitted Electronically

 RE: Comments on Proposed Changes to the Landfill Methane Regulation

Dear Chair Randolph,

Thank you for the opportunity to comment on the proposed updates to the Landfill Methane Regulation. I am writing on behalf of Recology, one of the leading recycling, composting, and waste collection companies in the state.

Recology is an employee-owned company and its California-based subsidiaries that own and operate active and closed landfills will be impacted by the regulation. In addition to operating landfills, we provide curbside collection services as the franchised hauler in over 88 communities throughout Northern California, ranging from major cities and suburban communities to remote rural areas, and also operate composting and material recovery facilities. We trace our roots back more than 100 years.

Recology is proud to have been at the forefront of the state’s push towards diversion of solid waste from landfill. In partnership with the City of San Francisco, we pioneered the first 3-bin system in any major U.S. city, and helped the City achieve the highest diversion rate of any major U.S. city. We have actively supported the cities and counties we work with in meeting the state’s ambitious recycling and emissions reduction mandates, including AB 939, AB 1826, AB 341, and SB 1383. Through our five California compost facilities, we are also one of the state’s largest commercial composters.

Consistent with our mission, Recology supports the robust effort California has undertaken to reduce landfill emissions and combat climate change. Updates to this rule will continue to push in that direction and should make the program more effective and efficient.

With this in mind, we believe the goals of the landfill methane rule are best served through fair, workable regulations that consider the operational intricacies and significant costs faced by entities operating in this sector. CARB should view the efforts undertaken by individual landfills in totality and avoid a one-size-fits-all approach for landfills. We offer the following comments in that spirit.

**Surface Emission Monitoring**

1. ***Proposal: Reduce threshold for surface emissions monitoring from 500ppm to 200ppm.*** The proposed 200 ppm trigger for increased monitoring based on instantaneous readings is too low. Readings can vary depending on a variety of factors and if the source of the increase is known, increased monitoring should not be mandatory. The required monitoring for the low threshold will increase costs of compliance without providing meaningful reduction in emissions from the current standard. Efforts should focus on the entirety of system’s performance and not solely on individual readings.
2. ***Proposal:*** ***Align monitoring after Satellite-Detected Emissions with oil and gas methane rule.*** The proposal to reduce from ten to three days to address emissions would not allow sufficient time to take any necessary action. Oil and gas facilities differ from landfills in significant ways. Emissions at oil and gas facilities are often restricted to certain localized operations and point sources. Landfills, on the other hand, have the potential to experience emissions from nearly any spot on the site. Furthermore, oil and gas facilities generally operate around the clock with a large number of staff available to identify causes and take action. By contrast, landfill operations are not perpetually staffed and have fewer operators on site at any given time. The regulation should take these factors into account when determining appropriate response times.
3. ***Proposal: CARB will establish a process for technology providers to apply for alternative surface emissions monitoring screening.*** Alternative monitoring technologies for landfills are still being studied and tested to evaluate their effectiveness and accuracy. CARB should consider partnering with organizations that are currently conducting studies, such as the Environmental Research and Education Foundation (EREF), to inform their process and support realistic timelines for compliance. Recent and ongoing studies have highlighted the current challenges of using alternative monitoring technologies at landfills. As the technology improves in accuracy it will be important for CARB to have a robust evaluation process in place that allows for input from landfill operators.
4. ***Proposal:*** ***Remove exclusions for areas that are difficult to monitor due to worker safety.*** CARB should maintain the current exclusions for the working face and construction areas as they remain too hazardous to require walking monitoring by individuals. While alternative monitoring technologies may be used in place of SEM under the proposal, these will be more costly for landfill operators. Further, alternative monitoring technologies have not yet proven to reliably and accurately measure continuous emissions. While alternative monitoring technologies can be effective in detecting leaks, the proposed application of these technologies may result in inaccurate reporting of emissions. Size and area of the working face rely on a variety of factors, such as topography and material intake, and compliance is best addressed by operational best practices. CARB should not limit the size and scope of these operational aspects without considering additional relevant factors.
5. ***Proposal: New or replacement well installation must be completed within 120 days of first exceedance:*** This proposal appears to rest on an assumption that all exceedances warrant replacement of the well registering an exceedance. Exceedances may occur due to a variety of factors, which should be considered when determining the cause of and how to remedy an exceedance. The rule should maintain an operator’s ability to investigate and correct exceedances through operational means such as adjustment or repair of the existing collection system, enhanced waste cover placement, or other operational adjustments. If a new well is determined to be needed, in some cases, replacement within 120 days may not be achievable. In areas with seasonal wet weather, it may be impossible to access the location with the proper equipment and replace the well safely within the proposed timeline. Additionally, availability of contractors and drill rigs used for work on landfills can be limited at times.
6. ***Proposal:*** ***Perform surface emission monitoring in all areas of landfills on a quarterly basis:*** For facilities meeting current surface emissions requirements, moving to quarterly monitoring would greatly increase the cost of monitoring but would be unlikely to result in significant emissions reductions or additional meaningful data justifying the additional burdens. Shifting the quarter during which monitoring is conducted would help address seasonal variability while retaining a balance of the labor and cost of conducting emissions monitoring at the full site.
7. ***Proposal: Align wellhead monitoring with U.S. EPA emission guidelines:*** Federal and state wellhead monitoring requirements overlap in numerous ways. Aligning these requirements would significantly reduce additional work needed to ensure compliance with all regulations.
8. ***Proposal: Various requirements to reduce downtime of the gas collection system:*** While landfill operators should make best efforts to minimize downtime of the gas collection system, there are situations where downtime cannot be avoided. Rather than setting strict limits on total downtime or units deactivated, a notification requirement would allow CARB to evaluate and respond to extended downtime when necessary. Each landfill is unique and a one-size-fits-all approach that dictates when wells can be disconnected from or reconnected to the system is likely to result in unintended consequences. For example, requiring daily reconnection of wells near the active fill area may also lead to overpulling, which can cause undesirable effects including subsurface oxidation. The new rule should maintain the operators’ ability to operate their landfill gas systems based on site and system conditions.
9. ***Proposal:*** ***Standardized requirements for well decommissioning and semi-continuous operation:*** In many cases, operators may seek to take additional measures due to declining gas generation. In other situations, changes to operations and procedures may require additional permitting from local air districts. These often include stricter standards for monitoring and releases despite the lower level of gas generation. Sites should be evaluated individually to determine whether and when changes to processes are necessary.
10. ***Proposal:*** ***Require standardized digital reporting:*** Both CARB and system operators would benefit from standardized digital reporting procedures.

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Thank you for considering these comments. If you have any questions, please do not hesitate to contact me at gkazanjian@recology.com.

Respectfully,

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Public Policy & Regulatory Affairs Manager

Recology