Updating California's Landfill Methane Regulation (LMR)

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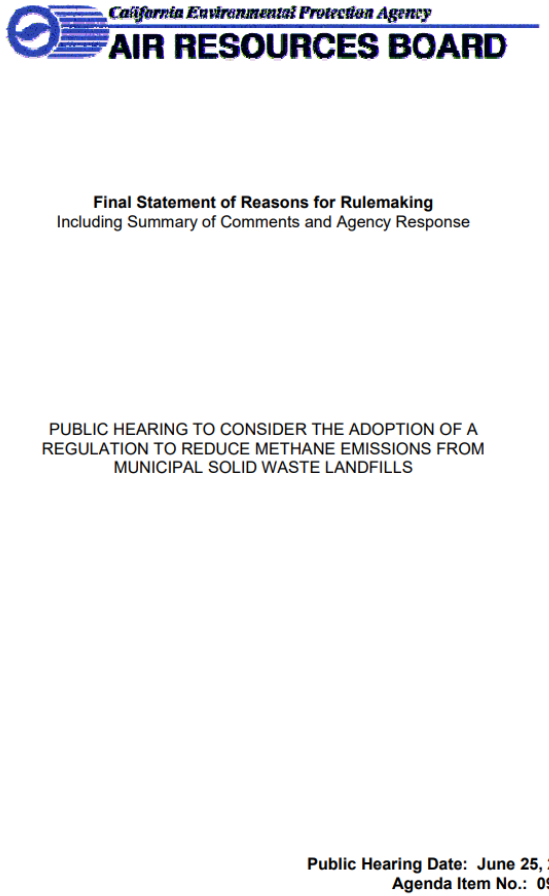
CALIFORNIANS AGAINST WASTE

The mission of Californians Against Waste is to protect communities by eliminating the pollution inherent in the extraction and disposal of natural resources.

CAW believes in preventing waste at its source and holding producers responsible throughout a product's lifecycle to transition California to a thriving circular economy.

Landfill Methane Reduction Regulations

- Adopted in 2010 as an AB 32 Early Action Measure to address methane emissions
- 2010 rule was supposed to be Phase 1 of the regulation
- Was the most stringent methane regulation on landfills in the country and went beyond federal standards



California Environmental Protection Agency
AIR RESOURCES BOARD

Final Statement of Reasons for Rulemaking
Including Summary of Comments and Agency Response

PUBLIC HEARING TO CONSIDER THE ADOPTION OF A REGULATION TO REDUCE METHANE EMISSIONS FROM MUNICIPAL SOLID WASTE LANDFILLS

Public Hearing Date: June 25, 2009
Agenda Item No.: 09-6-3

What has changed since 2010?

- Technological advancements– we can see methane from space!
- Better understanding of landfill impacts to frontline communities
- Lessons learned regarding best management practices (especially regarding temperature monitoring)

The Good

Remote Sensing Response Program

Operators must respond to large plumes found by remote sensing technologies (like satellites & aerial flyovers)

Increased Data Collection & Reporting

Operators have to collect more data and report to CARB more often (Singular annual report is split into annual and quarterly reports)

Reduced the Scope of Exemptions

Operators must monitor previously exempt areas of the landfill using alternative technologies (e.g. drones and rovers)

Missed Opportuny #1

Use of alternative technologies remains limited and optional for surface emissions monitoring (SEM).	
Reasoning: - Drones, rovers, continuous emissions monitoring, and other technologies are cost-effective and more efficient. - For communities, this means better quality data and more confidence in SEM procedures and findings	Solution: - Require operators to use alternative technologies more frequently and comprehensively for the whole surface of the landfill as technologies become approved for SEM compliance.

Missed Opportuny #2

Data transparency and community protections are not prioritized.	
Reasoning: - Data transparency is essential for building public trust, accountability, and protecting community health and safety. - Fenceline monitoring is critical for monitoring (and thereby controlling) emissions entering neighborhoods. Communities need this information to protect themselves and make educated decisions about their safety/wellbeing.	Solution: - Require fenceline monitoring for all landfills near communities - Require operators to host live emissions and operational data on a publicly accessible dashboard. - Publish all annual, quarterly, and violation reports online for community members to access.

Missed Opportuny #3

The current temperature thresholds (131°F and 145°F) are too high to *prevent* runaway subsurface fires.

Reasoning:	Solution:
- The amendments align with federal NSPS/NESHAP temperature thresholds. These thresholds have proven ineffective considering the prevalence of subsurface reactions. - Temperature differences can range 25 – 125 °F between the wellhead *(at the surface)* and downwell *(below the surface)*.	- Reduce the thresholds to more proactive temperatures. - Establish earlier triggers for downwell monitoring. Delaying 60+ days after a well is already running hot is unacceptable.

Missed Opportuny #4

Methane concentration limits too high	
Reasoning: The 500 ppmv surface methane limit was copied unchanged from the federal requirements in 2010 Staff and advocates have repeatedly proposed a more proactive threshold of 200 ppmv, and this adjustment has been discussed extensively during workshops since 2023.	Solution: Lower the surface methane concentration threshold for required mitigation from 500 ppmv to 200 ppmv.

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