



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON HYDE  
*Chief Engineer and General Manager*

February 10, 2017  
File No.: 31-380.10

Mr. Renaldo Crooks  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815

Dear Mr. Crooks:

Via: Website Post: <http://www.arb.ca.gov/cc/landfills/landfills.htm>

**Subject: Comments on the Air Resources Board Strategy for Compliance with the  
New Federal Requirements for Municipal Solid Waste Landfills**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate this opportunity to comment on the potential strategy to comply with the new federal requirements for municipal solid waste landfills (Strategy). The Sanitation Districts provide environmentally sound, cost-effective wastewater and solid waste management for about 5.3 million people in Los Angeles County and, in the process, convert waste into resources such as reclaimed water, energy, and recycled materials. The Sanitation Districts' service area covers approximately 800 square miles and encompasses 78 cities and unincorporated territory within the County through a partnership agreement with 24 independent special districts.

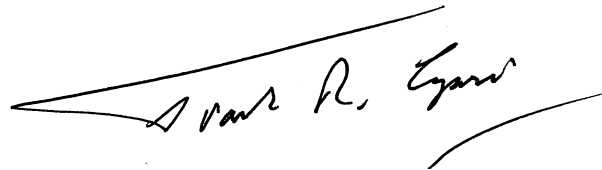
CARB is in a unique situation compared to other states because of the development of the Landfill Methane Reduction regulation (LMR) promulgated as part of the AB 32 program. The LMR is likely the most stringent landfill regulation in the country, if not the world, so should easily be found to be equivalent to the new federal landfill regulations. At the appropriate time, the Sanitation Districts strongly recommend that CARB seek programmatic equivalency through the LMR. However, because of the many structural problems with the new federal landfill requirements, several law suits have been filed. The structural problems with new federal requirements are significant enough that determining equivalency will be difficult if not impossible. Additionally, this is further compounded by the policies that may be adopted by the new Administration that have the potential to significantly impact the regulation or even pending

law suits. We therefore further recommend that CARB not proceed the Strategy until the legal challenges and potential policy developments are resolved.

Finally, when CARB does proceed forward, the model that was used in the original LMR development (utilizing an industry/regulatory workgroup) should be followed. If it is decided to rely on the LMR for equivalency, or even through LMR modifications to satisfy the new federal requirements, there are many important technical and legal details that should be worked out utilizing the experience of industry and the local air districts, through CAPCOA.

Thank you for the opportunity to comment on the Strategy. If you have any questions, please do not hesitate to contact the undersigned at this office.

Very truly yours,

A handwritten signature in black ink, appearing to read "Frank R. Caponi", is written over a horizontal line that extends across the width of the signature.

Frank R. Caponi  
Division Engineer  
Air Quality Engineering  
Technical Services Department

FRC:bb