

May 24, 2017

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Public Meeting to Consider California's Proposed State Plan for the Federal Municipal Solid Waste Landfill Emission Guidelines**

Dear Board Members:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) appreciates the opportunity to review the Air Resources Board's plan to implement the federal emission guidelines for municipal solid waste landfills (40 CFR Part 60, Subpart Cf). We appreciate the work of your staff in preparing this commonsense compliance strategy, which demonstrates that the state's existing Landfill Methane Regulation is equivalent to the federal guidelines.

Appendix C of the state plan contains a list of California landfills to which the federal emissions guidelines apply. If the plan is approved by your Board and subsequently approved by U.S. EPA, the Landfill Methane Regulation will become a federally enforceable regulation for the landfills in Appendix C.

L and D Landfill, located at 8635 Fruitridge Road, Sacramento, has been included in Appendix C of the plan. SMAQMD has reviewed the definitions of the terms *Municipal solid waste landfill or MSW landfill* and *Household waste* in the federal emission guidelines, at 40 CFR 60.41f. In addition, we have reviewed the letter from Jeffrey Mills at L and D Landfill, submitted on May 19, 2017, into the comment log for this agenda item.

It is clear from the federal emission guidelines that landfills that accept only construction and demolition waste and fully segregated yard waste are not municipal solid waste landfills under the federal definitions and, therefore, are not subject to the guidelines. Furthermore, we concur with the analysis presented in Jeffrey Mill's comment letter that L and D Landfill has sufficient restrictions in place that prevent it from accepting waste other than construction and demolition waste and fully segregated yard waste.

SMAQMD concludes that L and D Landfill is not subject to the federal emission guidelines and should be removed from Appendix C of the plan.

We thank you for your attention to our concerns.

Sincerely,



Larry F. Greene  
Executive Officer  
Sacramento Metropolitan Air Quality Management District

c: Mark Loutzenhiser, Division Manager, SMAQMD  
Kevin J. Williams, Ph.D., SMAQMD  
Kevin Robison, SMAQMD