



County of San Diego

DEPARTMENT OF PUBLIC WORKS

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Air Resources Board (ARB)
Clerk of the Board
<http://www.arb.ca.gov/lispub/comm/bclist.php>
1001 I Street, 23rd Floor
Sacramento, CA 95814

PROPOSED REGULATION TO REDUCE METHANE EMISSIONS FROM MUNICIPAL SOLID WASTE LANDFILLS

Honorable Members of the Air Resources Board:

Thank you for the opportunity to provide comments on the proposed AB 32 regulations for the control of methane emissions from municipal solid waste landfills. The County of San Diego (County) Department of Public Works (DPW), Landfill Management Section, is responsible for maintaining and managing County-owned closed and inactive solid waste sites. There are a total of 14 closed and inactive landfills formerly operated by the County. Of the sites, 10 have active landfill gas control systems and it is anticipated six of these sites would be subject to the proposed regulation. We are concerned the new regulations, as proposed, will substantially increase costs for these long-closed landfill sites without providing significant reduction in California's overall methane gas emissions. We have reviewed the most recent draft of the "Proposed Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills" and offer the following comments:

Source Test Requirements (Section 95464)

Proposed regulations require annual source testing at flares for the first three years after the regulation goes into effect and then require source testing every three years thereafter (provided that the flare is in compliance for three consecutive years prior). Of the County-owned landfills, five would likely be subject to this section of the regulation at a total annual cost of \$100,000. We suggest the source testing section of the regulation be modified to instead require source testing every *three* years with the exception that if a gas control device fails the source test the first year, it would trigger annual source testing until the device shows three consecutive years of source test

compliance. This suggested modification would provide owners of well-maintained closed facilities some financial relief while still providing assurance that gas control devices are being maintained properly.

Surface Emissions Monitoring (Section 95471 (c))

Proposed monitoring procedures for surface emissions monitoring would require quarterly surveys of the landfill be divided into individual 50,000 square foot grids and requires the walking pattern to be no more than a 25-foot spacing interval for at least four consecutive quarterly monitoring periods. While we do not believe County sites will have problems complying with the proposed emission standards, the method of demonstrating compliance is onerous and cumbersome, and the environmental benefit of this prescriptive monitoring protocol has not been demonstrated. By using this new grid procedure for both instantaneous and integrated surface emissions monitoring, we will incur additional costs of approximately \$125,000 per year at our subject sites plus additional costs for record keeping and reporting. This additional annual cost does not appear to be justified nor warranted. Instead, we suggest the regulations be revised to require using the existing New Source Performance Standard (NSPS) of 100-foot spacing interval for switchbacks. This alternate monitoring procedure will adequately characterize landfill surface emissions while being more cost effective.

Grant Assistance

We request the ARB consider providing assistance in the form of annual grants to help public agencies comply with the new regulations.

Agency Flexibility

We encourage the ARB to promulgate regulations which allow regulatory staff to be flexible on a case-by-case basis while still protecting public health and the environment.

Thank you for the opportunity to comment on the proposed regulations during this public comment period. If you have questions, please contact Vicky Gallagher, Inactive Landfills Program Manager, at (858) 495-5445, or me at (858) 694-2125.

Sincerely,



RICHARD E. CROMPTON, Assistant Director
Department of Public Works

REC:VG:cw

cc: Candis Compton, Land Use and Environment Group
Vicky Gallagher, DPW Inactive Landfills Program Manager