

Jill Whynot

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# South Coast Air Quality Management District

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*Office of the Executive Officer  
Barry R. Wallerstein, D.Env.  
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June 23, 2009

California Air Resources Board  
James Goldstene  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: South Coast Air Quality Management District (SCAQMD) staff comments on  
Proposed Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills

Dear Mr. Goldstene:

Staff at SCAQMD is pleased to express support for California Air Resources Board (CARB) Proposed Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills. Since 1985, SCAQMD has had a similar rule in place, Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills, which currently requires landfill gas collection and control systems on approximately 86 landfills and places a surface emission limit on hundreds of small inactive landfills with little gas generation and without collection and control systems. While none of these latter landfills will need to add controls, there are some areas of the CARB rule that are different than Rule 1150.1. Our staff will recommend modifying SCAQMD's Rule 1150.1 to align it with the adopted CARB regulation to make it easier for facilities located within SCAQMD geographic jurisdictional authority to comply.

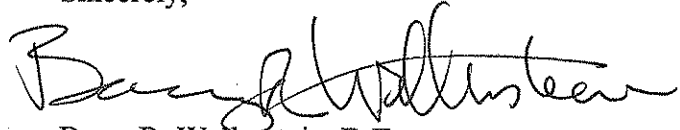
SCAQMD staff appreciates the option provided in §95473 for local air districts to enter into an agreement with CARB to implement and enforce this rule. This will provide streamlined administration and compliance determinations that will be very beneficial. SCAQMD staff will also ask our Board to approve SCAQMD enforcing the CARB rule in our jurisdiction. We will need to work closely with your staff to ensure the most efficient, streamlined process to minimize any administrative burdens, such as re-submitting data and information by the landfill operators to the state when it has already been submitted at the local level. In addition, SCAQMD staff and CARB staff will need to work together to clearly identify expectations and implementation mechanisms, including cost reimbursements.

*Thanking you for your attention*

The attachment to this letter has two suggested improvements to the proposed regulation for your consideration. These relate to the amount of time provided for installation of a new well to correct problems and clarification of exclusion from monitoring.

SCAQMD staff appreciates the cooperative effort exhibited during this rulemaking process and looks forward to continuing working with CARB staff during implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry R. Wallerstein". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Barry R. Wallerstein, D.Env.  
Executive Officer

Attachment

EC:JW:JC:EP:af

cc: Richard Boyd; Renaldo Crooks; Barbara Frye

**Attachment – SCAQMD Staff Additional Comments on  
CARB Proposed Regulation to Reduce Methane Emissions from Municipal Solid Waste  
Landfills**

**Monitoring Requirements**, Section 95469 (a)(1)(B) and (2)(B) include a corrective action schedule for exceedance of the instantaneous or integrated surface monitoring standards. The schedule requires two ten-day periods for correction and re-monitoring and then a 120 day period to achieve compliance by installing a new well. SCAQMD Rule 1150.1 sets two ten-day periods followed by a 45-day period. The 120-day period allowed for installing a new well seems excessive. It has been rare in the SCAQMD for any facilities to request more than 45 days to install new wells. The following modification to the text is recommended:

§95469. Monitoring Requirements (a)(1)(B)(2)

If the re-monitoring shows a third exceedance, the owner or owner or operator must install a new or replacement well as determine to achieve compliance no later than ~~45~~<sup>120</sup>-calendar days after detecting the third exceedance, or it is a violation of this subarticle.

**Test Methods and Procedures**, Section 95471(c)(1)(C) allows for landfill surface monitoring that, "Portions of slopes that are 30 degrees and greater, wet or icy surfaces, construction areas and other dangerous areas may be excluded from landfill surface inspection. Paved roads that do not have cracks, pot holes or other penetrations may also be excluded." SCAQMD has allowed slopes of 30 degrees or greater to be excluded from monitoring under the alternative section of Rule 1150.1 provided that the landfill operator applies for the exclusion and documents what areas of the landfill meet that specification. Because a slope or surface is not defined, there is too much latitude for monitoring and demonstration of compliance. Staff believes that all exclusions should be handled under the alternative section of the proposed rule in Section 95468 where the landfill can provide information to the permitting authority to justify and document the exclusion. This could be accomplished with the following modifications:

§95471. Test Methods and Procedures (c)(1)

~~(C) Portions of slopes that are 30 degrees and greater, wet or icy surfaces, construction areas, and other dangerous areas may be excluded from landfill surface inspection. Paved roads that do not have any cracks, pot holes, or other penetrations may also be excluded.~~

~~(D)~~ Surface testing...

~~(E)~~ Surface emissions testing...

§95468. Alternative Compliance Options (a)

(4) Areas that are dangerous, such as portions of slopes that are 30 degrees and greater, wet or icy surfaces, or construction areas.

(5) Paved roads that do not have cracks, pot holes, or other penetrations.