



# Air Resources Board



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chair**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

May 30, 2017

Ms. Alexis Strauss  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

RE: Submission of California's State Plan for Compliance with the Federal Emission Guidelines for Municipal Solid Waste Landfills

Dear Ms. Strauss:

The California Air Resources Board (ARB or "Board") is submitting the California State Plan to Implement the Emission Guidelines and Compliance Timelines for Municipal Solid Waste Landfills (State Plan) pursuant to 40 CFR Part 60, Subpart Cf ("Landfill Emission Guidelines" or "Subpart Cf").

As a world leader in addressing air quality and climate change, ARB fully supports the intent of U.S. Environmental Protection Agency's (U.S. EPA) Landfill Emission Guidelines to reduce the greenhouse gas and criteria pollutant emissions. Half of these emissions from landfills are methane – a potent short-lived climate pollutant with a global warming potential 72 times that of carbon dioxide over 20 years.

Recognizing the importance of immediate action to reduce landfill methane emissions, ARB's first Scoping Plan,<sup>1</sup> written in response to the California Global Warming Solutions Act of 2006,<sup>2</sup> identifies methane reductions from landfills as a priority discrete early action measure. As a result, ARB adopted a statewide Landfill Methane Regulation<sup>3</sup> (LMR), which became effective June 17, 2010. Staff estimates that the LMR regulates an additional 30 landfills in California beyond those subject to Subpart Cf. These additional landfills result in 91,193 metric tons of CO<sub>2</sub>e per year<sup>4</sup> of greenhouse gas reductions beyond what could be realized from implementation of

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<sup>1</sup> California Air Resources Board, *Climate Change Scoping Plan* (2008) available at [https://www.arb.ca.gov/cc/scopingplan/document/adopted\\_scoping\\_plan.pdf](https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf).

<sup>2</sup> Health & Saf. Code § 38500, et seq., Assembly Bill 32 (Nunez, ch. 488, Stats. of 2006).

<sup>3</sup> Methane Emissions from Municipal Solid Waste Landfills, 17 Cal. Code Regs. 95460, et seq., available at <https://www.arb.ca.gov/regact/2009/landfills09/landfillfinalfro.pdf>.

<sup>4</sup> Based on 2015 Emissions.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

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Subpart Cf alone. Because of this, ARB is submitting the LMR as its compliance strategy to comply with the plan submittal requirements of Subpart Cf.

The LMR parallels many of Subpart Cf's substantive requirements; both regulations contain monitoring requirements, test methods and procedures, recordkeeping and reporting requirements, emission guidelines, provisions requiring the installation of a gas collection and control system to control landfill gas, operational standards, a compliance timeline, and penalty provision. However, substantively and as applied, the LMR imposes more stringent requirements and provides greater emission reduction benefits over a broader scope of regulated landfills.

The Board recently approved the *Short-Lived Climate Pollutant Reduction Strategy*,<sup>5</sup> which includes targets to reduce the level of the statewide disposal of organics in landfills by 50 percent by 2020 from 2014 levels, and 75 percent by 2025 from 2014 levels. We anticipate this measure will result in reductions of 4 million metric tons of CO<sub>2</sub> equivalent in 2030. Our 2017 Climate Change Scoping Plan Update<sup>6</sup> highlights our past accomplishments and additional work that must continue in the waste management sector to reduce greenhouse gas emissions.

ARB believes in the positive synergistic results that national and state governments can achieve when we tackle issues together in a cooperative fashion. U.S. EPA has historically recognized California for its strong leadership role in reducing air pollutants and addressing the effects of climate change and has often modeled its own efforts after California's. Our partnership has resulted in significant human health and welfare protections and progress towards meeting our mutual climate change goals. We are happy to work with U.S. EPA to ensure that the federal and state rules work well together. We also believe that California's LMR can be a model to illustrate what the rest of the nation can achieve.

Thank you for this opportunity to submit California's State Plan. We agree that significantly reducing landfill gas emissions is critical to achieve the greenhouse gas reductions needed to turn back the tide of climate change, and hope that California's submittal will help U.S. EPA advance its climate change goals.

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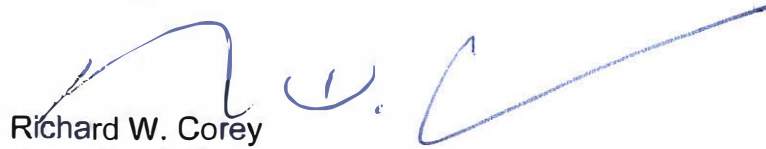
<sup>5</sup> California Air Resources Board, *Short-Lived Climate Pollutant Reduction Strategy* (Mar. 2017) available at [https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final\\_slcp\\_report.pdf](https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final_slcp_report.pdf).

<sup>6</sup> California Air Resources Board, *The 2017 Climate Change Scoping Plan Update* (Jan. 2017) available at [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf).

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Regional Acting Administrator  
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If you have any questions concerning this submittal, please contact me at (916) 322-7077, or by email at [richard.corey@arb.ca.gov](mailto:richard.corey@arb.ca.gov), or Shannon Martin Dilley, Counsel, at (916) 322-3940, or by email at [shannon.dilley@arb.ca.gov](mailto:shannon.dilley@arb.ca.gov).

Sincerely,



Richard W. Corey  
Executive Officer

cc: Shannon Martin Dilley, Counsel  
Legal Office