

CARB's Landfill Methane Regulation (LMR) Amendments Factsheet

Background: In November 2025, the California Air Resources Board (CARB) officially approved significant amendments to the Landfill Methane Regulation (LMR). The amended regulations are scheduled to take effect on January 1, 2027. As California's second-largest methane source, landfills are the primary focus of these updates, which aim to reduce emissions by 450,000 metric tons of CO₂ equivalent annually and provide roughly \$34 million in annual social, health and environmental benefits balanced against an estimated \$12 million annual cost to the industry.

Important Changes:

New standards for monitoring subsurface temperatures and oxygen levels have been introduced to prevent landfill fires.

- Gas wells must be maintained below 145°F, and enhanced monitoring is required for any well within 200 feet of a temperature exceedance.
- The installation timeline for Gas Collection and Control Systems (GCCS) has been reduced from 18 months to 6 months following plan approval.
- Active "Working Faces", the open area where solid waste is deposited daily and compacted with landfill equipment, now require active gas collection to begin once waste reaches a depth of 15 vertical feet, ensuring emissions are captured during the most active phase of waste decomposition.

Monitoring and Enforcement requirements:

- Areas previously excluded due to safety concerns or rugged terrain, such as steep slopes, must now be monitored using advanced technologies such as drones, rovers, or handheld laser scanners.
- Operators are now legally mandated to investigate and mitigate methane plumes detected by CARB's satellite and aerial monitoring programs, a process that was previously voluntary.
- Initial leak repairs must now be initiated within 3 days of detection (previously a 10-day window), and follow-up monitoring to confirm a successful repair must be completed within 10 days of the initial detection.

The amendments mandate the creation of a public dashboard which will provide residents and regulators with real-time transparency into landfill performance and compliance.

- The regulation applies to 188 municipal solid waste landfills in California. The amendments now clarify that third-party owners of gas collection systems (not just the landfill owners) are also legally responsible for compliance.

Exemptions:

- Hazardous Waste and CERCLA Landfills: Facilities that receive only hazardous waste or are currently regulated under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
- Specific Waste Types: Landfills that contain only construction and demolition wastes, inert waste, or non-decomposable wastes.
- Small Closed/Inactive Facilities: Closed or inactive Municipal Solid Waste (MSW) landfills with less than 450,000 tons of waste-in-place.

New Regulation (2025)

Old Regulation (2010)

Installation timeline for Gas Collection and Control Systems (GCCS) 6 months

Installation timeline for Gas Collection and Control Systems (GCCS) 18 months

Active "Working Faces" now require active gas collection to begin once waste reaches a depth of 15 vertical feet, ensuring emissions are captured during the most active phase of waste decomposition.

Active Faces exempt from gas collection systems

Areas that pose safety concerns or rugged terrain, such as steep slopes, must now be monitored using advanced technologies such as drones, rovers, or handheld laser scanners.

Areas posing safety concerns or rugged terrain, such as steep slopes excluded from methane gas testing

Operators are now legally mandated to investigate and mitigate methane plumes detected by CARB's satellite and aerial monitoring programs

Investigating and mitigating methane plumes detected by CARB's satellite and aerial monitoring programs was voluntary

Initial leak repairs must now be initiated within 3 days of detection and follow-up monitoring to confirm a successful repair must be completed within 10 days of the initial detection.

Leak repairs to be initiated within 10 days