



San Diego County Air Pollution Control District

January 13, 2026

Ariel Fideldy, Branch Chief
Air Quality Planning Branch
California Air Resources Board
1001 I Street
Sacramento, CA 9581

Mike Martucci, Acting Regional Administrator
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

REQUEST FOR SUBMITTAL OF COMMITMENT LETTER TO MAKE AMENDMENTS TO RULE 69.7 – LANDFILL GAS FLARES OF THE SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

Dear Ms. Fideldy and Mr. Martucci,

On April 3, 2023, the California Air Resources Board (CARB) submitted San Diego County Air Pollution Control District (District) Rule 69.7 – Landfill Gas Flares to the U.S. Environmental Protection Agency (EPA) for inclusion into the State Implementation Plan (SIP). However, on December 15, 2025, EPA notified the District and verbally identified two deficiencies in Rule 69.7 Subsections (h)(3)(i) and (ii) which specify test methods required to determine composition of landfill gas.

The District is submitting this letter of commitment to adopt and submit amendments to Rule 69.7 for rule approvability by EPA and inclusion into the SIP. Specifically, the District commits to proposing amendments to Subsections (h)(3)(i) and (ii) to specify that the most current version of the test methods listed shall be approved by the EPA:

1. Subsection (h)(3)(i) – "ASTM D3588-98(2017)e1 (Standard Practice for Calculating Heat Value, Compressibility Factor, and Relative Density of Gaseous Fuels), or its most current version **approved by the EPA**; and".

2. Subsection (h)(3)(ii) – “ASTM D1945-14(2019) (Standard Test Method for Analysis of Natural Gas by Gas Chromatography), or its most current version *approved by the EPA*; or”.

Under Section 110(k)(4) of the Clean Air Act, the EPA may proceed with a conditional approval of District Rule 69.7 if the District commits to these amendments to address these specific deficiencies within one year of EPA’s conditional approval. The District commits to adopt these revisions and transmit them to CARB by Spring 2027, for final submission by CARB to EPA no later than June 30, 2027, or within one year of the effective date of the EPA conditional approval action in the Federal Register (whichever is soonest). To meet this commitment, the District anticipates that it will announce an opportunity for public comment on the revisions by Winter 2026.

If you have any questions or need additional information, please contact Nick Cormier at nick.cormier@sdapcd.org or (858) 586-2798.

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Paula Forbis, Air Pollution Control Officer
San Diego County Air Pollution Control District