Air Enforcement: U.S. Environmental Protection Agency and Livermore, California Landfill Operator Enter into Consent Agreement

05/27/2026

The United States Environmental Protection Agency ("EPA") and Waste Management of Alameda County, Inc. ("WMAC") entered into an April 28th Consent Agreement and Final Order ("CAFO") addressing alleged violations of the Clean Air Act. See Docket No. CAA-09-2026-0053.

The CAFO provides that WMAC owns and operates the Altamont Landfill in Livermore, California.

A liquid natural gas plant ("LNG Plant") was stated to have been operated at the landfill by High Mountain Fuels, LLC ("HMF") from approximately January 2010 until June 2023. It has been taken out of service and removed.

The landfill is stated to hold a Title V Permit and be subject to certain Clean Air Act regulations. Further, the Title V Permit is stated to have governed a GCCS including gas collection wells and two flares, a two-turbine gas-to-energy plant, and LNG Plant.

EPA alleges that from July 1, 2019 to July 31, 2023, WMAC failed to ensure that the LNG Plant tanks were compliant with the landfill NSPS, the landfill NESHAP, the State Plan, and/or specific provisions of the landfill's Title V Permit. Further, EPA alleges that from July 1, 2019 to February 9, 2020, WMAC failed to ensure that all emissions from the LNG Plant tanks were controlled pursuant to 40 C.F.R. §§ 63.1959(b)(2)(iii)(A) or (B).

The CAFO also alleges violations in specified time periods which include:

- Failure to ensure that gas routed to the LNG's treatment system was controlled according to certain regulatory requirements.
- Failure to ensure that all emissions from the LNG Plant tanks were controlled pursuant regulatory requirements.
- Failure to ensure that treated landfill gas emissions from the LNG Plant tanks were controlled according to certain regulatory requirements.
- Failure to ensure that all waste gas streams from the LNG Plant that were generated during normal operations, during start-up procedures, during maintenance events, and during trips or other malfunctions were recycled back to the LNG Plant processing equipment or gas collection or control system, or vented to the A-16 Landfill Gas Flare, in violation of the Title V Permit.

A civil penalty of $215,000 is assessed.

A copy of the CAFO can be found here.