TETRA TECH

April 17, 2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comment on 15-Day Notice-Landfill Methane Regulation Amendments

Members of the Board,

We appreciated the commitment and hard work CARB has put into the proposed revisions to the Regulation on Methane Emissions from Municipal Solid Waste Landfills. At this time, we would like to comment on the current amendments and request clarification/consideration of the following items, that were modified with this current proposed amendment.

Modifications to Section 95469, Monitoring Requirements, Item 102

While the goal behind Section 95464(g) to ensure effective landfill gas (LFG) collection is fully supported, the current single vacuum setpoint framework presents major operational and compliance hurdles. Many facilities use multiple, interacting vacuum sources—such as redundant blowers, separate pumps for different header zones, or LFG-to-energy units—that often compete when tied into a common header. Gauge pressure measured at a single vacuum-side location therefore fluctuates frequently as equipment cycles, changes speed or adjusts to load demands.

The requirement to re-tune all wells within ten calendar days each time the system pressure setpoint changes is impracticable given normal operational variability. LFG-to-energy engines and redundant blowers commonly cycle on and off for legitimate operational reasons; treating every transient or short-term pressure variation as a setpoint change would impose continual re-tuning obligations that are operationally infeasible and administratively burdensome. The 15-minute gauge recording requirement is useful for detecting excursions at a measurement point, but by itself it cannot reliably distinguish between transient, routine equipment activity and a sustained control change that warrants corrective action.

To achieve the regulation's environmental objectives while allowing for practical, reliable operation, the following clarifications and adjustments are requested for consideration:

- Redefine "setpoint change." Exclude temporary pressure fluctuations caused by routine equipment cycling, engine startup/shutdown, or brief redundancy transitions. A setpoint change should be defined as an adjustment intentionally made by operations staff or as a change that remains in effect for a sustained period (for example, longer than 72 hours).

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- Revise the re-tuning timeline. Extend the re-tuning window to a more practicable schedule, such as requiring tuning/adjusting only when a setpoint change is sustained for a defined period (e.g., greater than 72 hours) or providing and extended timeline of 30 days.
- Accept alternative monitoring and data-interpretation methods. Allow the use of multiple measurement points, short-term averaging, trend analysis, or alarm logic that requires sustained deviations (for example, three consecutive 15-minute readings outside the acceptable range or a continuous deviation exceeding one hour) before requiring wellfield tuning/adjustment.

These minor revisions would reduce false-positive alarms, limit unnecessary manual interventions, and enable site-specific engineering solutions, such as hybrid vacuum/flow control, without compromising emission control standards.

Modifications to Section 95471, Testing Methods and Procedures, Item 134

This comment concerns §95471(c)(1)(E) and §95471(d)(4)(F), which require that surface emissions monitoring (SEM) be conducted only when "there has been no measurable precipitation or application of water or other liquids in the preceding 72 hours." Clarification is requested regarding the meaning and intent of "measurable" as it applies to water or other liquid applications used for routine dust control at landfill sites.

Routine industry practice at many landfills is to apply water or other dust-suppressant liquids daily, and in some areas potentially multiple times per day, to maintain compliance with conditions in air permits. Depending on weather conditions, the volume applied, the area of application, frequency of application, and local surface conditions (for example, recently graded cells or large open surfaces), routine dust-control activities could reasonably meet a literal interpretation of "measurable."

If routine dust control triggers the 72-hour wait period, operators face a Catch-22: they must either delay critical SEM and follow-up monitoring or suspend dust suppression, risking visible-emissions permit violations and potential associated public-health and compliance concerns.

To avoid unintended operational conflicts and to ensure SEM remains practicable and effective, CARB is requested to either:

- Define "measurable" in quantitative terms (for example, by specifying a minimum volume per unit area that would constitute a measurable application); or
- Explicitly exempt routine landfill dust-control applications from the 72-hour restriction when those applications are unrelated to SEM remediation; or
- Clarify that only deliberate surface-wetting intended as part of the mitigation efforts would trigger the 72-hour postponement for SEM monitoring.

The apparent intent of the provision appears to be to avoid false negatives caused by recent, substantial wetting of the surface that would mask emissions, rather than to preclude SEM. Clarifying the current language would minimize the risk of creating unintended operational conflicts that could hinder both emissions monitoring and air quality compliance.

Modifications to Section 95469, Monitoring Requirements

This comment concerns §95469(b), which requires operators to address remotely detected emission plumes. It is not clear how exceedances identified through remotely detected plume monitoring and re-monitoring under §95469(b) will be treated in relation to the recurring surface exceedance provisions in §95469(a)(4). Clarification is needed on whether the initial plume detection or the exceedances discovered during plume-triggered monitoring and the 600-foot by 600-foot investigation area will be counted as "initial exceedances" toward the thresholds that trigger recurring surface exceedance requirements.

To achieve the regulation's environmental objectives while allowing for practical, reliable operation, the following clarifications and adjustments are requested for consideration:

- Explicitly state in §95469(b) that neither initial remotely detected plume monitoring exceedances and re-monitoring do not count towards "triggering" the requirements of §95469(a)(4); or
- Provide clarification in section §95469(a)(4) that includes a "trigger value" regarding initial remotely detected plume monitoring exceedances or exceedances detected during re-monitoring.

Thank you for the opportunity to comment on this latest version of the revised Landfill Methane Regulation.

Sincerely,

TETRA TECH

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