



**US Composting Council**



**SIERRA CLUB**  
FOUNDED 1892



**Friends of the Earth**



*Because life is good.*



GRASSROOTS RECYCLING NETWORK



**SF Environment**  
Our home. Our city. Our planet.  
A Department of the City and County of San Francisco



**US COMPOSTING COUNCIL  
CALIFORNIA RESOURCE RECOVERY ASSOCIATION ■ CENTER FOR BIOLOGICAL DIVERSITY  
CENTER FOR A COMPETITIVE WASTE INDUSTRY ■ CITY OF MADISON (WI)  
FRIENDS OF THE EARTH ■ GRASSROOTS RECYCLING NETWORK  
RECYCLING ORGANIZATIONS OF NORTH AMERICA  
SAN FRANCISCO DEPARTMENT OF THE ENVIRONMENT  
SIERRA CLUB ■ TEXAS CAMPAIGN FOR THE ENVIRONMENT**

April 6, 2010

Hon. Lisa P. Jackson, Administrator  
U.S. Environmental Protection Agency  
Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Petition to Reorganize the Landfill Methane Outreach Program

Dear Ms. Jackson

Because of your strong commitment to reducing the risks of global warming, we are writing to formally petition the Environmental Protection Agency to reorganize and rename its Landfill Methane Outreach Program (LMOP) so it can better meet the overall objectives of the Agency.

At present, as one of EPA's lead programs to reduce methane from the waste sector, the LMOP has aggressively boosted efforts to capture methane at landfills. The basic assumption of this strategy is at odds with EPA's primary missions. For example, goals listed on the home page of EPA's OSWER program include waste reduction, land revitalization, and recycling. Landfill diversion of organics to compost facilities, potentially in combination with controlled anaerobic digestion offers the potential to help achieve these goals. Diversion should be the focus of EPA's waste management hierarchy.

Recent surveys indicate that 65 local programs in the U.S. have followed the alternative diversion model, first established in the European Union and later in three Canadian provinces, to separate the organic stream for composting. They, and the many more interested cities and states, need EPA to expand its repertoire of local assistance to comprehensively address fugitive methane from landfills by also including measures to avoid the problem in the first instance.

Landfilling is the waste management strategy that is the lowest on the Integrated Waste Management Hierarchy. The primary source of fugitive methane emissions are from landfilled organics. Fugitive methane is only created when organics are buried in landfills, where anaerobic conditions prevail. It is not a byproduct of decomposition when those organics are diverted to the other commercially available options, such as composting, which in addition to avoiding methane and producing a valuable soil conditioner, recovers the nutrients in those organics to help restore fertility to our depleted soils. Compost in turn can be used to rebuild soils and rebuild communities through urban agriculture.

The LMOP's work has championed landfill-gas-to-energy (LFGTE) by focusing exclusively on the minor gains from displacing electric generation on the utility grid, while disregarding all of the fugitive methane – one of the more aggressive greenhouse gases – that escapes in the process. Using all of EPA's landfill conventions, 87 pounds of CO<sub>2</sub> will be avoided per wet ton of waste buried. However, the fact is that 430 pounds of CO<sub>2</sub>-equivalent – five times more – will be released into the atmosphere at the same time – something which LMOP's presentment fails to recognize. If one uses the Intergovernmental Panel on Climate Change's lower assumed landfill gas collection efficiency value, only 23 pounds of CO<sub>2</sub> will be avoided, and 1,279 pounds of CO<sub>2</sub>-equivalent – 55 times more – will escape. Also, many other important adjustments would further widen the disparity between LFGTE and diversion.

If energy capture is truly a primary goal for waste management, controlled anaerobic digestion at dedicated facilities is the appropriate method to do this. Full scale facilities in North America and Europe have shown the efficacy of this approach. In addition, controlled anaerobic digestion both more effectively utilizes the carbon value in organic discards and also conserves the nutrients and a portion of the carbon from the feedstocks both of which have value for soils.

Through the LMOP's efforts, according to the Congressional Reference Service, \$12.9 million in Stimulus funds were provided to LFGTE projects and none to the alternatives described above. Furthermore, the LMOP has previously been a major force in encouraging inclusion of LFGTE in state Renewable Portfolio Standards' programs (RPS), which provide far greater subsidies in many states where LFGTE facilities receive more than 10¢/kWh for electricity that costs less than a nickel to produce. These subsidies could be redirected to organics management industries that maximize the value of these materials including controlled anaerobic digestion and composting.

For these reasons, we respectfully ask that you:

(1) Rename the current Landfill Outreach Methane Program to be the new Organics Management Outreach Program (OMOP); and

(2) Charge the new OMOP to more effectively encourage reductions in methane emissions from the waste sector by prioritizing those strategies with the greatest potential to achieve that objective.

Your considered attention is appreciated.

Sincerely,

US COMPOSTING COUNCIL  
by Wayne King, President

CALIFORNIA RESOURCE RECOVERY ASSOCIATION  
by Julie Moore, President

CENTER FOR BIOLOGICAL DIVERSITY  
by Matthew D. Vespa, Senior Attorney

CENTER FOR A COMPETITIVE WASTE INDUSTRY  
by Peter Anderson, Executive Director

CITY OF MADISON  
by George P. Dreckmann, Recycling Coordinator

FRIENDS OF THE EARTH  
by Erich Pica, Chief Executive Officer

GRASSROOTS RECYCLING NETWORK  
by Linda Christopher, Executive Director

RECYCLING ORGANIZATIONS OF NORTH AMERICA  
by Marjorie Griek, President

SAN FRANCISCO DEPARTMENT OF THE ENVIRONMENT  
by David Assmann, Acting Director

SIERRA CLUB  
by Ed Hopkins, Director Environmental Quality Program

TEXAS CAMPAIGN FOR THE ENVIRONMENT  
by Robin Schneider, Executive Director

cc:Office of Solid Waste and Emergency Response  
Office of Air and Radiation  
Office of the Administrator Policy, Economics and Innovation  
Regional Administrators

**Correspondence in response may be sent to:**

**Mr. Peter Anderson,  
Center for a Competitive Waste Industry  
313 Price Place, Suite 14  
Madison, WI 53705**

**Phone (608) 231-1100 • Facsimile (608) 233-0011 • email: [anderson@competitivewaste.org](mailto:anderson@competitivewaste.org)**