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September 12, 2014

Environmental Protection Agency

EPA Docket Center (EPA/DC)

Sent via email to: a-and-r-Docket@epa.gov

Subject: Attention Docket ID No. EPA-HQ-OAR-2014-0451

Re: Proposed New Standards for Municipal Solid Waste Landfills and Request for Information on Methods to Reduce Emissions from Existing Landfills

CRRA welcomes the opportunity to provide input on the Advance Notice of Proposed Rulemaking (ANPR) issued by the US EPA on July 17, 2014 and published in the Federal Register (<http://www.gpo.gov/fdsys/pkg/FR-2014-07-17/pdf/2014-16404.pdf>) regarding EPA rulemaking to reduce landfill methane gas emissions from municipal solid waste (MSW) landfills.

CRRA recommends that EPA include in its recommended methane reduction rule the Key Recommended Actions listed in Table1 (attached), which have been adopted by the California Air Resources Board in its Scoping Plan to implement the Global Warming Solutions Act of 2008 (AB32) which makes reduction of greenhouse gases a major priority for the State of California.

CRRA has worked for many years to highlight the significant benefits of Zero Waste climate protection strategies, particularly reducing landfill methane gas emissions. Our members have been active participants in the EPA's West Coast Forum on Climate Change, Waste Prevention, Recovery and Disposal. They have provided frequent and valuable input to California state agencies¹ regarding the often-overlooked benefits of Zero Waste climate protection strategies.

Separating food scraps and organic discards for composting and digestion (rather than landfilling) not only reduces methane emissions, but provides additional climate protection, ecological, and economic benefits including: reduced erosion; reduced water use and the associated energy required to transport and treat water; reduced chemical soil amendment manufacturing and usage with all its life-cycle ecological footprint impacts, and increased soil carbon storage.

As you can see, CARB has addressed many of the issues that the EPA should address in the ANPR to further reduce methane-rich landfill gas emissions from existing

The views expressed in this letter do not necessarily represent those of the Sponsors listed above.



¹ Particularly the Air Resources Board (ARB) and Department of Resources, Recycling and Recovery (CalRecycle)



municipal solid waste (MSW) landfills. CRRA urges EPA to review the recommendations and methodologies adopted by CARB and incorporate those into this rulemaking. We would be pleased to discuss this with you in more depth at your convenience, and help connect you with CARB regulators who have already concluded a similar regulatory process.

Thank you for the opportunity to comment on this ANPR.

Sincerely,

John H. Dane, CAE
Executive Director

CRRA is California's state-wide recycling association. It is the oldest and one of the largest non-profit recycling organizations in the United States. A 501(c)(3) organization, CRRA is dedicated to achieving environmental sustainability in and beyond California through Zero Waste strategies including product stewardship, waste prevention, reuse, recycling and composting. CRRA advances local, regional and state-wide waste reduction efforts which result in critical environmental and climate protection outcomes. Our members represent all aspects of California's reduce-reuse-recycle-compost economy. They work for cities and counties, as well as hauling companies, material processors, non-profit organizations, state agencies, and in allied professions.

**Table 1 – California Air Resources Board
AB 32 Scoping Plan**

Key Recommended Actions for the Waste Sector

- ARB and CalRecycle will lead the development of program(s) to eliminate disposal of organic materials at landfills. Options to be evaluated will include: legislation, direct regulation, and inclusion of landfills in the Cap-and-Trade Program. If legislation requiring businesses that generate organic waste to arrange for recycling services is not enacted in 2014, then ARB, in concert with CalRecycle, will initiate regulatory action(s) to prohibit/phase out landfilling of organic materials with the goal of requiring initial compliance actions in 2016.
- ARB and CalRecycle will identify and execute financing/funding/incentive mechanisms for in-State infrastructure development to support the Waste Management Sector goals. Mechanisms to be considered will include the Cap-and-Trade Investment Plan; loan, grant, and payment programs; LCFS pathways; CPUC proceedings (e.g. biogas from anaerobic digestion and Renewable Market Adjusting Tariff); and offset protocols for recycling, composting, anaerobic digestion, and biomass.
- ARB will lead a process of identifying and recommending actions to address cross-California agency and federal permitting and siting challenges associated with composting and anaerobic digestion. As the first step, ARB convened a working group in 2013 made up of representatives from CalRecycle, SWRCB, and local air districts to identify challenges and potential solutions. A working group report will be released in mid-2014.
- ARB will explore and identify opportunities for additional methane control at new and existing landfills, and increase the utilization of captured methane for waste already in place as a fuel source for stationary and mobile applications. If determined appropriate, amend the Landfill Methane Regulation and/or move landfills into the Cap-and-Trade Program (2016/17).
- ARB and CalRecycle will develop new emission reduction factors to estimate GHG emission reduction potential for various recycling and remanufacturing strategies. To the extent data are available, these factors will include upstream and downstream emissions impacts.
- CalRecycle and the Department of General Services will need to take the lead in improving the State procurement of recycled-content materials through the State Agency Buy Recycled Campaign reform. Recommended improvements need to be identified by 2014, along with a plan for implementing the identified improvements.