



GiNRE - Mandate Capture

Statement to support the mandated capture of landfill gas at all active landfills

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Group name strongly urges the EPA to extend its current regulation on landfill gas capture to include all active landfills regardless of size.

The capture of landfill gas for energy generation or flaring reduces the threats to environmental and public health, including hazardous air pollutants, volatile organic compounds, the threat of explosion, and the potency of greenhouse gas emissions. When the EPA mandated gas capture as an operational requirement for some landfills in 1996, the rule was issued under the same rationale as the existing requirements for liners and leachate treatment-these measures protected the surrounding community and were a necessary cost of business. This rule established landfill gas collection as a cost of doing business for large landfills in the industry, and this policy should be expanded to all landfills as a means to protect public health and reduce environmental impacts.

Methane emissions are drastically understated.

The EPA assumes 75% of landfill gas is captured via gas collection systems, but actual field measurements of collection efficiency are all over the board. A 2006 Intergovernmental Panel on Climate Change (IPCC) report cites studies that measure collection efficiencies ranging from 9-90 percent, representative of the many uncertainties involved with modeling gas generation and collection system performance. The IPCC estimates recovery efficiency at an average of 20 percent. Even the waste industry attests methane emissions are not accurately tabulated: "Waste Management has determined that it is infeasible to make reliable measurements of methane emissions at the 243 landfills it operates...and the extraordinary diversity among landfills has made it impossible to develop a useful, broadly-applicable model of fugitive emissions." This data uncertainty, in the face of public health risks, necessitates the EPA regulate all active landfills as sources of emissions, regardless of size.

Voluntary gas capture grants an unfair economic advantage to landfills.

Landfill gas capture systems are a capital and operating expense for landfills and increase the tipping fee at the landfill. Without the gas capture system, the landfill operates at a lower cost and passes the risks and costs of the fugitive gas emissions along to the public and the environment. By charging less than the full costs of their impacts, landfills hold an economic advantage over their competition, particularly over recycling and composting industries, which do not burden the public or the environment with long-term health risks. Landfills must also install liners and leachate collection systems to reduce short and long-term health and pollution risks, and these systems are included in the cost of landfilling. Landfill gas capture should be a cost of business as well, not a burden upon current and future generations.

Other countries are moving forward to eliminate the problem.

With the uncertainties surrounding the collection efficiency of landfill gas, landfills may be a greater contributor to climate change than originally thought. This puts more emphasis on the need to control all landfill emissions, including at small to medium sites. Around the world, communities and countries are moving forward in protecting public and environmental health by reducing landfill gas emissions altogether, not just seeking to offset a small fraction of the risk. The European Union has committed to reducing the landfilling of biodegradable materials by 65% within 15 years and the German government has moved one step further to outlaw the landfilling of any unprocessed waste. These countries are solving the problem of landfill gas and leachate emissions, not just patching an inevitable hole, and are demonstrating the forethought and leadership needed to solve environmental problems in the 21st century.

The capture of landfill gas reduces human and environmental health risks posed by landfilling, and the EPA should mandate this practice at all active landfills. This practice should not be voluntary, and it should not be incentivized through tax credits meant for renewable energy. Voluntary or incentive-based programs do not provide adequate protection against risks and do not reflect the true costs of landfilling waste to present or future generations.

While mandating gas capture at all landfills will close a dangerous loop in the current system, nothing short of stopping the landfilling of biodegradable materials will fully protect human health and minimize environmental risks. *Group name* fully supports the mandatory gas capture at all active landfill sites in the interim and emphasizes the need for the EPA to move forward in setting a timeline to eliminate the threats of landfills by ending the landfilling of biodegradable materials.

Sincerely,

Group name

Sources

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