

Dear ARB:

Thank you for the opportunity to submit brief comments on the issue of recognizing voluntary early actions in Cap-and-Trade (C&T). As I pointed out in the workshop, there needs to be a process where by various industry groups can be recognized for the historical reductions in GHG emissions -- even though the data may not be robust enough to actually generate saleable or tradable GHG emission reduction credits.

One of the best examples of the need for such recognition by the ARB of the GHG reductions that have been made by the solid waste and recycling industry over the past 30 years -- including the reductions that have occurred in GHG emissions from landfills. The attached technical peer-reviewed paper by Keith Weitz et al (Mr. Weitz is currently a consultant to the CIWMB in conducting an organic waste life-cycle assessment) documents the changes that have been implemented by the solid waste and recycling industry in general over the past years -- and that have been specifically implemented at landfills to reduce GHG emissions. These reductions have been achieved by cooperative efforts of the solid waste and recycling industries -- working hand in hand with government regulators and the communities we serve to transform the manner that landfills are operated and waste materials are collected and recycled.

The results of the attached paper indicate that the MSW management actions taken by participants in the solid waste and recycling infrastructure have significantly reduced potential GHG emissions despite an almost 2-fold increase in waste generation. Nationwide in the US, GHG emissions from MSW management were estimated to be 36 million metric tons carbon equivalents (MMTCE) in 1974 and 8 MMTCE in 1997. If MSW were being managed today as it was in 1974, GHG emissions would be ~60 MMTCE.

The report also documents that due to:

- o diversion of waste from landfills,
- o the growth of landfill gas-to-energy projects from 0 in 1974 to nearly 300 in 1997,
- o Clean Air Act requirements, and
- o improvements in landfill design and management,

there has been a substantial reduction of GHG emissions associated with MSW landfills. Overall, the report documents that GHG emissions from landfills in the US declined by 50% from 1974 to 1997. Had landfills not been controlled in this manner, coupled with the increase in wastes requiring disposal, actual GHG emissions from landfills in the US would have been more than 3 time higher than they are today.

We believe that few other industries in the US can point to such dramatic reductions in GHG emissions over the past 30 years.

This type of information should be considered as back drop when contemplating additional actions to further reduce and control GHG emissions -- such as including facilities and operations into a forthcoming cap and trade system. This is not to say the further action to reduce GHG emissions may not be justified and necessary. However, these new additional actions and controls should be contemplated in recognition of any GHG reductions that have occurred in the past. The solid waste and recycling industry believes that our industry is an excellent example where such recognition is appropriate and well-deserved. Again, this recognition is not for purposes of generating saleable or tradable credits. Rather, it is to hopefully put continuing GHG reduction measures in the proper context.

For Waste Management and the Solid Waste Industry for Climate Solutions (SWICS) --

<<AWMA-GHG-Paper-Weitz.pdf>>

*Chuck White, Director  
Regulatory Affairs/West  
Waste Management  
915 L Street, Suite 1430  
Sacramento, CA 95814  
Phone: 916-552-5859  
Cell: 916-761-7882  
Email: cwhite1@wm.com*

*From Everyday Collection to Environmental Protection  
Think Green, Think Waste Management !*