



May 7, 2007

Catherine Witherspoon  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Need for Early Action Measure Expansion**

Dear Catherine Witherspoon:

Californians Against Waste strongly supports the Board's decision to include landfill gas capture as one of the discrete Early Action Measures. We urge you, however, to expand this measure to include the implementation of known practices that can reduce methane emissions from uncontrolled portions of all landfills, instead of exclusively focusing on reductions from the small fraction of landfills that don't have a gas collection system. In addition, the best management practices identified in phases two and three of the landfill methane capture measure should be mandatory instead of voluntary, and they should have a specific timeline for implementation.

The draft EAM is focused on landfills without any gas control systems. While this will result in reduced emissions, the vast majority of methane is emitted from landfills with gas collection systems. Landfills differ greatly in terms of gas collection practices and even those with collection systems do not collect gas from all the waste-in-place. A landfill gas collection system isn't typically installed for up to five years, or until a given cell of the landfill has reached a minimum waste depth. Even after systems are turned on, they are not run at full operational capacity until final cover is applied on the landfill cell.

Laboratory studies have shown that food waste (which is the single most prevalent item in the waste stream) peaks in decomposition within the first 50 days, and other organics also decompose relatively quickly. Even with an ideal capture system, large quantities of putrescible waste decompose in a landfill before gas collection systems are turned on and able to capture the landfill gas. We encourage you to reduce the allowable period organics may sit in a landfill without gas capture, or, alternatively, require landfill operators to divert some portion of the compostable organics to a compost facility.

The second and third phases of the proposed early action measure (which are not part of the ARB Discrete Early Action Measure) will establish best management practices for landfill methane reduction which could substantially decrease greenhouse gas emissions. We strongly urge you to expand the Discrete Early Action Measure to include the identification of these BMPs and a timeline for their mandatory establishment. This would be a very significant and cost-effective step towards

reducing global warming emissions from California's largest anthropogenic source of methane.

Sincerely,



Scott Smithline  
Director of Legal and Regulatory Affairs

cc: Chuck Shulock, Program Manager for Greenhouse Gas Reduction, ARB  
Richard Bode, Chief of the Emission Inventory Branch, ARB

