

Solid Waste Industry for Climate Solutions

*Allied Waste Services
County Sanitation Districts of Los Angeles County
National Solid Waste Management Association
OC Waste & Recycling
Norcal Waste Systems
Republic Services
Waste Connections
Waste Management*

August 31, 2008

ETAAC Members
c/o Steven J. Church, P.E.
Air Resources Engineer
California Air Resources Board
schurch@arb.ca.gov

Via Email

Subject: Review of Draft Scoping Plan

Dear ETAAC Members:

The Solid Waste Industry for Climate Solutions (SWICS) is an informal organization of public and private entities providing solid waste and recycling services in California and throughout North America. The solid waste industry has previously expressed concerns in writing and testimony about the ETAAC Report's original conclusions concerning solid waste management alternatives for recycling and organic waste disposal. We understand that ETAAC may be considering offering comments on the Draft Scoping Plan. We would like to take the opportunity to provide you with the comments that SWICS has submitted previously on the Scoping Plan (attached) and request that you will take these comments following viewpoints into consideration with respect to recommendations you may make regarding the Solid Waste and Recycling Sector.

The solid waste and recycling industry has made tremendous progress in reducing GHG emissions over the last 30 years.

Few, if any other, major sectors of California's economy can make a similar claim. It has been reported in independent published reports that GHG emissions have been significantly reduced by the solid waste and recycling industry. Since 1974, greenhouse gas emissions from our sector have been reduced by 75% while total generation of solid waste for which we provide services has more than doubled.

Landfill Methane Emissions are extremely low.

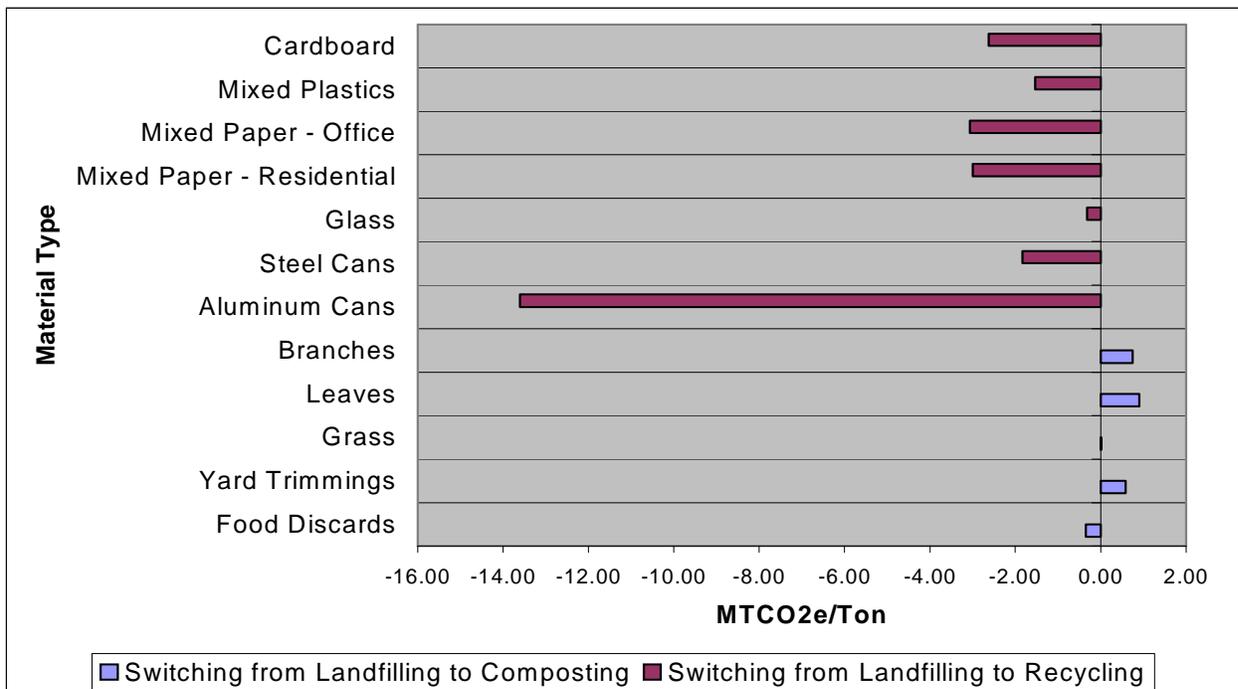
94% of all waste disposed in California landfills is managed with active gas control systems. Even though the CARB continues to use nationwide default assumptions regarding landfill methane collection and destruction efficiency, landfill methane emissions estimated by CARB represent only 1% of California’s total GHG emissions. We believe that actual emissions are even lower than CARB estimates due to California’s dryer climate and more aggressive landfill gas control regulations. We are concerned that the ETAAC Committee has made, and may continue to make, statements that “*recycling and composting avoid landfill methane emissions*”. These statements cannot be confirmed unless a life-cycle analysis is completed for individual recyclables and compostable materials.

SWICS Supports recommendations to encourage increased recycling and renewable energy and materials from waste – particularly when these activities can be clearly shown to effectively contribute to reductions in GHG emissions.

The draft Scoping Plan has taken the correct approach in the solid waste management sector portion of the report by addressing landfill emissions of methane as an Early Action Measure, and recommending that plans for increased recycling, composting and waste-derived energy needs to be addressed separately by the CIWMB. GHG reductions associated with recycling *and composting* are highly dependent on the type of material being managed.

Net Changes in GHG emissions when changing from Landfilling to Recycling or Composting (MTCO₂E/Ton)

[US EPA Solid Waste Management and Greenhouse Gases: A life Cycle Assessment of Emissions and Sinks -- 2006](#)



The previous chart that was recently presented by CIWMB staff to their Board in August 2008. It is derived from the current (2006) US EPA state-of-the-art thinking regarding the GHG impact of diverting solid waste from landfills (and assuming only a 75% landfill methane capture efficiency that we believe is actually far higher in California!) – [US EPA Solid Waste Management and Greenhouse Gases: A life Cycle Assessment of Emissions and Sinks -- 2006](#))

Addressing GHG emissions from solid waste management is complex and can only be properly conducted through a thorough life-cycle analysis – such as is currently underway by the CIWMB. Major recommendations on the management of organic waste should be deferred until the completion of this CIWMB study. Recommendations should not be made on the assumption that landfill GHG emissions are high and compost GHG emissions are low or even non-existent. Many air districts have found significant VOC and GHG emissions from poorly managed compost facility operations. *We strongly urge ETAAC to defer specific recommendations on organic waste management until completion of the CIWMB organic waste life-cycle assessment.*

Diversion of organic waste from landfills may not necessarily result in lower GHG emissions.

The solid waste industry shares ETAAC's concerns that solid waste management and recycling activities should minimize GHG emissions to the maximum extent feasible. However, we believe that the ETAAC should support the draft Scoping Plan in recommending that that best science be developed through life-cycle analyses before any specific control approaches are proposed. As evidenced by the above chart, the greatest reduction of GHG emissions through recycling comes from the diversion of aluminum, steel and waste paper. California has already taken great strides to reduce the landfill disposal of aluminum, steel and waste paper. The solid waste industry supports continued efforts to increase recycling programs – particularly when reduced GHG emissions can be clearly demonstrated.

According to US EPA, as depicted above, the changes in GHG emissions achieved by switching organic waste from landfills to composting is modest at best – *and may be negative for many types of organic materials depending on the methods used for landfilling or composting the material.* The US EPA analysis depicted above only indicates that the composting of *food waste* may have any GHG benefit. SWICS agrees that the information behind these numbers needs to be carefully reviewed and evaluated using the best information currently available. That is precisely what the CIWMB is currently engaged in right now. *We strongly urge that definitive statements on the GHG benefits of organic materials management strategies should be withheld until completion of the CIWMB organics management study and life-cycle assessment.*

Thank you for the opportunity to provide these comments for your consideration. Please contact any one of the undersigned if you have questions.

Sincerely,

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Attachment: SWICS letter on CARB Scoping Plan dated August 1, 2008 (w/o attachments -- attachments available on request)

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