



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 95TH AIR BASE WING (AFMC)
EDWARDS AIR FORCE BASE CALIFORNIA**

Mr. Herbert W. Roraback
95th Air Base Wing, Civil Engineer and Transportation Directorate
Environmental Management Division
Chief, Environmental Quality Branch
5 East Popson Avenue, Building 2650A
Edwards AFB, California 93524-8060

SEP 20 2007

Mr. Michael Roberts
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, California 95812

Dear Mr. Roberts

Thank you for the opportunity to provide comments on the potential additions to the list of early actions to reduce emissions of greenhouse gases required by the Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. Our comments pertain to the measure of landfill methane capture, which was approved by the California Air Resources Board (CARB) on June 21, 2007 as one of three discrete early actions that must be implemented by January 1, 2010.

Edwards Air Force Base owns a landfill that would likely be captured by one of the three discrete early actions adopted in June. CARB has stated in its draft staff report (*Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration, Draft, September 2007*) that it has considered cost-effectiveness and feasibility before placing control measures on the list. However, our preliminary analysis indicates that it would not be feasible to capture methane from our landfill due largely to the arid nature of our environment. We would actually need to make more methane by bringing in outside waste and pump additional moisture in order to capture on the order of 0.008 MMT CO₂e per year at an estimated cost between \$2 to \$4 million US. To draw a correlation to the order of magnitude, CARB stated in its earlier staff report (*Proposed Early Actions to Mitigate Climate Change in California, April 20, 2007*) that it would reduce between 2 to 4 MMT CO₂e per year from 41 landfills or an average of 0.05 to 0.19 MMT CO₂ per landfill per year.

Clearly, for Edwards AFB, this would not be considered technologically feasible, or cost effective. Therefore, we would respectfully request that CARB staff consider regulatory language when developing its regulations and scoping plan to address specific geological, topographical and temperature considerations.

These comments are only submitted on behalf of Edwards AFB and not the Air Force or other military services in California. Other military installations also have landfills and will require their

own review. We have considered this issue relative to Edwards AFB and offer these comments in *this* context.

We welcome the opportunity to work with CARB on any Working Groups it establishes to draft regulatory language. If you have any questions or need additional information, please contact Mr. John Vidic at 661-277-9065.

Sincerely


HERBERT W. RORABACK
Chief, Environmental Quality Branch

cc:

95 ABW/CEV

95 ABW/JA

AFFTC/JA

AFCEE/CCR-S Baha Zarah

AFCEE/CCR-S Scott Dickinson