

October 23, 2014

California Air Resources Board

1001 “I” Street

Sacramento, CA 95812

ATTN: Mr. Wes Ingram, Manager, Fuels and Evaluation Section -- [wingram@arb.ca.gov](mailto:wingram@arb.ca.gov)

Mr. Chan Pham, Air Resources Engineer -- [cpham@arb.ca.gov](mailto:cpham@arb.ca.gov)

**RE: LCFS Program - Comments on Proposed Changes to California GREET Model**

Dear Mr. Ingram and Mr. Pham:

Waste Management(WM) appreciates the opportunity to comment on CARB staff’s proposed changes for the California GREET Model under efforts to reauthorize the Low Carbon Fuel Standard (LCFS) regulation.

WM is the leading provider of comprehensive waste management and environmental services in North America. The company served approximately 20 million municipal, commercial, industrial and residential customers through a network of 390 collection operations, 294 transfer stations, 266 active municipal solid waste (MSW) landfill disposal sites, 17 waste-to-energy (WTE) power plants, 121 recycling facilities, 34 organic processing facilities and 131 beneficial-use landfill gas projects. Our landfill gas projects account for about one-quarter of all landfill gas-to- energy projects in the United States. The capacity of these projects is equivalent to approximately 700 megawatts. In addition, WM is actively investing in companies and technologies that can process organic wastes to produce fuels from solid waste using anaerobic digestion and other processes to produce renewable energy.

To date, WM, in partnership with Linde of North American, is the only company to produce commercial quantities of Renewable Natural Gas in California for use as a low carbon transportation fuel. We produce up to 13,000 gallons of Renewable LNG at our Altamont landfill in the Bay Area for use as a transportation fuel throughout California. Waste Management has plans to fuel the majority of our California fleet of approximately 3000 heavy-duty vehicle refuse and recycling fleet with low carbon Renewable Natural Gas. Stable and predictable high-value LCFS credits are essential to the realization of these plans.

We are writing to indicate our overall support for reauthorization of the LCFS. However, we urgently ***request that CARB allow additional time for review of, and potential modifications to, its proposed changes to the CA-GREET model*.** As CARB staff have made clear, methane leakage is very complex, and there is much uncertainty with existing data. Significant new data on this and other related issues should be available in the next six to twelve months. It is premature to change the carbon intensity values for natural gas (or any other fuel pathways) before that information becomes available.  Further, the control of methane leaks, to the extent they exist, is fundamentally a solvable engineering problem. WM is firmly committed to ensuring that the facilities we use to produce RNG utilize state-of-the-art methane emission control technologies and procedures. We, therefore, urge CARB to withhold updating the CA GREET model in order to allow sufficient time to obtain, review and incorporate emerging, peer-reviewed information about methane leakage (roughly, six to 12 months). As we understand it, CARB can reauthorize the LCFS legislation in February 2015 without rushing to update the CA-GREET model.

The LCFS has been a positive force for alternative fuels. Waste Management strongly believes that it is critically important to improve the science on which this program is based. We therefore respectfully ask CARB to separate out reauthorization of the LCFS from adoption of new CI values in CA-GREET at least until the peer-reviewed data on methane leakage is available and can be fully considered.

Sincerely,

***Original Signed by Charles A. White***

Charles A. White, P.E.

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