April 29, 2010

Honorable Lisa Perez Jackson, Administrator
U.S. Environmental Protection Agency (1101A)
1200 Pennsylvania Ave., NW
Washington, DC 20460

Dear Administrator Jackson:

The Solid Waste Association of North America and the National Solid Wastes Management Association would like to take this opportunity to comment on a petition recently filed by the Center for a Competitive Waste Industry that asks to EPA to reorganize and restructure the Landfill Methane Outreach Program (LMOP). The National Solid Wastes Management Association (NSWMA) and the Solid Waste Association of North America (SWANA) represent companies, municipalities, and professionals in the solid waste management industry. NSWMA is a not-for-profit trade association representing private sector solid waste collection, disposal, and recycling companies. SWANA is a professional education association in the solid waste management field with members from both the public and private sectors.

While our organizations support composting in an integrated solid waste management system, we believe that the capture and beneficial use of methane at landfills is a crucial component in reducing overall greenhouse gas emissions from the solid waste sector. The success of EPA’s LMOP in helping achieve these reductions is overwhelming. From 1990 to 2008, emissions from landfills dropped 15%, a fact highly attributable to the beneficial use of landfill gas projects that LMOP supports.

We support LMOP and would like to see it continue as an effective advocate of methane recovery and reuse as a source of green energy. We plan to follow up with EPA in the near future to provide additional comments on the beneficial use of landfill gas. If you need any additional information in the meantime, please contact John Skinner of SWANA at 301-585-2898 or jskinner@swana.org or Bruce Parker of NSWMA at 202-364-3720 or bparker@envasns.org.

Sincerely,

Bruce J. Parker     John H. Skinner, Ph.D.
President and CEO    Executive Director and CEO
NSWMA     SWANA

Cc: Regina A. McCarthy
    Mathy V. Stanislaus
    Rachel Goldstein