SWANA Calls for a Permanent Exemption for Biogenic CO₂ Emissions from Municipal Solid Waste Management Activities

Silver Spring, MD—The Solid Waste Association of North America (SWANA) requested that the Environmental Protection Agency’s (EPA) Scientific Advisory Board (SAB) support a categorical exclusion for biogenic CO₂ emissions from management of municipal solid waste from the Prevention of Significant Deterioration and Title V GHG Tailoring Rule. SWANA believes that this exemption should apply to biogenic CO₂ generated from the combustion of landfill gas and from waste-to-energy facilities.

SWANA called for this exemption in May 18 comments submitted in response to the SAB Review of EPA’s Draft Accounting Framework for Biogenic CO₂ Emissions from Stationary Sources. In support of this exemption, SWANA described the very significant reductions of greenhouse gas emissions from solid waste management activities over the past several decades. Since the 1970s, greenhouse gas emissions from this sector have been reduced by 75% while total generation of solid waste has more than doubled.

“These reductions have been achieved through an integrated system of solid waste management that includes landfill gas recovery, waste-to-energy and increased diversion from landfills through recycling and composting” said SWANA Executive Director and CEO John H. Skinner, Ph.D. “No other major industrial sector in North America can make a similar claim for the goods or services they provide,” Skinner added.

The SAB recommended that EPA consider identifying those feedstock categories for which the biogenic accounting framework (BAF) would automatically be set to zero. SWANA agrees with this recommendation and notes that the use of waste as a fuel source is widely accepted as carbon neutral and actually reduces greenhouse gas emissions on a lifecycle basis. SWANA believes that the landfill gas combustion category warrants an automatic BAF of zero, given the extensive life cycle analyses already conducted by EPA. For waste-to-energy, the panel recommended that EPA should take into account the mix of biogenic and fossil carbon when waste is combusted and SWANA agrees with this recommendation.

The SAB also recommended that for landfill gas combustion, EPA should incorporate emissions and partial capture of methane from landfills. SWANA disagrees with this recommendation and believes there is no scientific or policy basis for regulating biogenic CO₂ emissions based on methane collection efficiency, which has no impact on CO₂ emissions from landfills. SWANA also recommended that the EPA Framework account for carbon sequestration of municipal solid waste disposed in landfills. Carbon
sequestration is quantifiable, the biological process is well understood and described in Agency documents and peer-reviewed scientific literature, and is offsetting effects are easily assigned at the facility level.

In 2011 EPA had deferred dealing with CO2 emissions from biogenic sources under the Tailoring Rule for a three-year period to provide time for the Agency to develop an appropriate approach for dealing with such emissions. EPA’s Accounting Framework and the SAB review are part of the Agency’s efforts to develop such an approach. SWANA’s comments to the SAB can be found here.

About SWANA: For 50 years, the Solid Waste Association of North America (SWANA) has been the leading professional education and training association in the solid waste management field. SWANA’s mission is to “advance the practice of environmentally and economically sound management of municipal solid waste.” SWANA serves over 8,000 members and thousands more industry professionals with technical conferences, certifications, publications, and a large offering of technical training courses. For more information visit www.swana.org.