



## OFFICE OF LAND AND EMERGENCY MANAGEMENT

WASHINGTON, D.C. 20460

April 11, 2025

Amy Lestition Burke  
Solid Waste Association of North America  
8484 Georgia Avenue, Suite 230  
Silver Spring, Maryland 20910

Dear Ms. Burke:

Thank you for your February 28, 2025, letter about the key priorities of the Solid Waste Association of North America. Administrator Zeldin asked me to respond on his behalf since the issues you raise fall mainly under the Office of Land and Emergency Management's purview.

On February 4, 2025, EPA Administrator Zeldin announced the Agency's Powering the Great American Comeback Initiative to achieve our mission while energizing the greatness of the American economy. This plan outlines our priorities under the leadership of President Trump and Administrator Zeldin. The initiative consists of five pillars that will guide our work.

Specifically, Pillar 3 focuses on permitting reform, cooperative federalism, and cross-agency partnership. This pillar guides our work to address reasonable regulations for landfills. As you know, non-hazardous solid waste landfills are regulated under Subtitle D of the Resource Conservation and Recovery Act, which is largely delegated to the states. The regulatory criteria applicable to municipal solid waste landfills include location restrictions, composite liner requirements, leachate collection and removal systems, operating practices, groundwater monitoring requirements, closure and post-closure care requirements, corrective action provisions, and financial assurance. EPA recognizes the essential role modern engineered landfills play in protecting public health and environmental resources. We are committed to ensuring that regulations under Subtitle D of RCRA remain both effective and practical.

EPA acknowledges your concerns about methane measurement technologies and agrees that reliable, proven methods are vital before implementing new requirements. Regarding landfill gas-to-energy projects, we share your enthusiasm for their potential to contribute to energy independence. EPA will follow direction from Congress with respect to the continuation of grants and tax credits, such as those supporting landfill gas infrastructure and recycling initiatives, as these decisions are ultimately determined by legislative actions.

We also acknowledge your support for statutory relief for passive receivers of per- and poly-fluoroalkyl substances. EPA continues to conduct research to better understand PFAS destruction and disposal.

EPA prepared a guidance document called, “Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances – Version 2 (2024).” We will consider public comments on this version of the guidance as well as additional advancements in PFAS research and science to revise this interim guidance within the next three years.

We acknowledge the importance of waste to energy systems and the critical role they play in integrated waste management systems across the nation. On January 23, 2024, EPA proposed amendments to Title 40, Code of Federal Regulations, Part 60, subparts Cb and Eb, the Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Large Municipal Waste Combustors (89 FR 4243). The comment period for this proposed rule closed on March 25, 2024. EPA then reopened the comment period on January 16, 2025, to gather additional information on the proposed amendments to the Large Municipal Waste Combustor regulations. We will review comments and consider new information that may impact our analysis.

We appreciate your support of the use of domestic renewable resources to create high-quality materials for essential infrastructure and consumer goods. The reuse and recycling of materials supports the Administrator’s goal for every American to have access to clean air, land, and water. EPA thanks SWANA for your key role in the recycling supply chain and for supporting the anaerobic digestion of organic materials. We appreciate your statement on the federal government maintaining an active and visible role at the national level to create a stronger, more resilient, and a cost-effective national recycling system.

Thank you for your support of the Solid Waste Infrastructure for Recycling Grants. During the first round of SWIFR funding, EPA selected 139 grants for awards totaling over \$165 million. We also appreciate your support of the battery collection best practices and labeling guidelines initiatives. These efforts will improve domestic battery collection and recycling and help prevent the fires that are creating an emergency in your sector as well as improve the nation’s domestic battery supply chain.

Finally, we appreciate the offer to tour one of your facilities and meet with your members. We'll look for opportunities in the future to engage with you on these important issues. If you have any questions, please contact Andy Crossland in the EPA’s Office of Resource Conservation and Recovery at [crossland.andy@epa.gov](mailto:crossland.andy@epa.gov) or 202-566-0486.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. N. Breen", followed by a long horizontal line extending to the right.

Barry N. Breen  
Principal Deputy Assistant Administrator