

Teri Wion
California Department of Resources Recycling and Recovery
P.O. Box 4025, MS-13A
Sacramento, CA 95812-4025
FAX: (916) 34 1-7701
E-mail: climatechange@calrecycle.ca.gov

AB 32 Scoping Plan Priority

On June 18 2101 California Environmental Protection Agency, Californian Air Resource Board and CalRecycle held a public workshop to review plans to reduce Green House Gases in California and asked for Priority Recommendations.

The Grassroots Recycling Network requests that recommendation be implemented immediately for the following reasons.

11. Regulatory/Statutory b. Consider regulatory or statutory actions requiring phasing organics out of landfills and moving toward inert only landfilling practices as a Short term/ongoing through 2020

Staff reports provided at the workshop showed significant progress in reducing materials disposed of in landfill toward the State 75% goal and reducing greenhouse gas emission can be achieved by eliminating landfill as an option for the disposal of compostable organic material.

Achieving AB 341's 75% recycling mandate will result in an estimated 20 to 30 MMTCO₂e reduction in 2020 compared to business as usual. Meeting these combined GHG and recycling goals will require greater utilization of existing alternative pathways for waste processing and development of new alternative pathways. A significant portion of the solid waste is compostable/digestible organics. Diverting organic waste from landfilling and using it as feedstock in composting and anaerobic digestion processes will achieve GHG reductions and will be critical in achieving our waste reduction goals. “ \

MSW landfills are the second largest anthropogenic source of methane in California (ARB, 2009b). The organic portion of solid waste disposed in MSW landfills decomposes to form landfill gas. Landfill gas contains 40 to 60 percent methane, 40 to 60 percent carbon dioxide, and trace amounts of non-methane organic compounds (NMOCs).

Optimizing gas collection efficiency is dependent on landfill design, operation and maintenance of the gas collection system, and closure/post-closure practices. Reducing the amount of organic materials going to landfills will reduce future methane emissions. This is particularly true of material that tends to decompose rapidly such as green waste and food waste.

The composition of currently landfilled solid waste materials according to 2010 data is an estimated 37 million tons of waste in landfills each year, of which roughly 30 percent - more than 10 million tons per year - are compostable organic materials which are suitable for composting or anaerobic digestion. These compostable materials are food waste, green waste, a portion of other organics, and soiled (non-recyclable) paper.

Instead of landfilling, using organic material as feedstock for composting and anaerobic digestion can result in reductions of GHG emissions. The GHG emission reductions from these activities would occur due to avoided landfill emissions, displacement of fossil fuel with biogas, and reduction in synthetic fertilizer and water usage.

When 75 percent of compostable/digestible materials are diverted from landfills in 2020 and beyond, which is needed in order to achieve the AB 341 75% recycling goal, the resulting GHG emissions benefits are estimated to be approximately 4.5 to 5.6 MMTCO₂e per year.

The relatively low cost of landfilling and the lack of financial incentives for non-landfilling alternatives may hinder increases in composting and anaerobic digestion

There are about 370 landfills in California which due to their in-place or permitted volume, waste age, and other pertinent factors have the potential to emit significant quantities of methane. About 220 of the 370 are likely to be subject to ARB's Landfill Methane Control Measure (Landfill Measure), an AB 32 discrete early action measure adopted in 2009. The remaining landfills are likely to be exempted because they: never accepted or ceased accepting municipal solid waste (MSW) prior to January 1, 1977, have waste-in-place that is below the 450,000 ton threshold, or are hazardous waste sites. Approximately 1.2 billion tons of solid waste has accumulated in the State's landfills with an additional 30 million tons being added each year (ARB, 2009; Cal Recycle, 2013).

The plan should include the recommendations made by staff working on funding , regulations and markets.