

Dear Project Managers:

In my opinion, it is a huge mistake to grant emission offset credits to landfill gas projects. Such credits should be reserved for facilities that invest capital for projects that would otherwise not be done. Large "dry" landfills often produce enough gas to be economically feasible to exploit, and the gas has been, and will be burned beneficially.

1. Why are you favoring landfills, when so much organic matter is decomposed to produce methane and CO₂? Why do you not address sewage sludge digesters, etc? Again, such sources will be exploited anyway, if feasible.
2. Landfills are unique (in biomass gas production) in producing numerous toxic gases along with methane and CO₂, some of which are carcinogens. Burning the gas creates yet more toxins.
3. For the landfills that have not yet been exploited for beneficial gas production, and for which you want to grant offset credits, there is no practical means to monitor gas produced. Marginal landfills will produce a lot of methane for a few days, then production will drop off. If the landfill has a 1000 CFM blower, and is producing 1 CFM of methane, are you going to credit the landfill with 1000 CFM of production? In some cases, it may require more virgin makeup gas to keep the minimal methane production ignited.

I apologize for the hasty reply, but I am concerned that you are making a serious mistake.

Dave Armstrong, P.E.
Former landfill gas extraction engineer