

Solid Waste Industry for Climate Solutions

(SWICS)

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Comment on the draft Landfill Project Protocol Version 3.0

I thought I would add a few thoughts to the Closed vs. Operating Landfills issue. Our basic premise in commenting on this issue previously was that the landfill protocol, as written, was serving as an obstacle to certain projects that would create methane reductions, which would meet the additionality criteria. The main conflict was that for proposed projects that included expansions to existing pre-2001 gas systems, the protocol uses as a baseline the capacity of the existing control device. Thus, these post-2001 wellfield expansions were deemed not to create any credible methane reductions since the reductions were not beyond the capacity of the existing control device, even though they were clearly beyond the actual methane reductions being created from the pre-2001 system. As such, the projects would not occur, and no methane reductions would be created, which is exactly the opposite of what the protocol was supposed to do---create incentive for additional methane reductions from landfills.

The current draft of the revised protocol appears to address this issue, but only for closed landfills. However, active landfills can have the exact same situation, so we do not see the need for any distinction. You can just as easily have an active site that has a pre-existing, pre-2001 gas system installed for various reasons (e.g., energy recovery, migration, etc.). However, if that landfill has no requirement to expand that system into any other area of the site, they won't unless maybe they are incentivized through potential GHG credits to do so, which is what we all want to see.

But, like you could have for a closed site, they have an existing control device which has a larger capacity than the actual gas being collected from the pre-2001 system. Using the control device capacity as a baseline, an expansion of the gas system would not create any methane reductions that could be turned into credits per the current protocol. Also like closed sites, an active site might have a larger than currently needed flare for many reasons (e.g., designer over-designed it, landfill did not produce as much as expected, they planned for some possible future need, larger flare was available, etc.). Frankly, the size of the pre-2001 flare for a closed or active site should not make any difference (nor should the reason it is oversized) for determining whether they can make use of the option presented in the draft revision to the protocol. If either of those sites is willing to spend hundreds of thousands of dollars on a wellfield expansion and separate flow and methane metering equipment to collect methane they would not otherwise collect, the protocol should certainly recognize that. In fact, from a GHG perspective, you should want them to use the existing control device if it has capacity available because having to get a new flare will create additional GHG emissions from the manufacture, transportation, and construction of the new flare at the landfill. Therefore, as long as they can show that the wellfield expansion is collecting additional gas, meeting additionality criteria, and it is metered and monitored separately from a methane and flow standpoint, then the reductions should be credible whether the site is active or closed. Each year, CAR and the verifier would simply need to confirm that the claimed reductions are additional beyond the reductions occurring from the pre-2001 system. As an accredited verifier, that would be a very straightforward thing to do and would be required for both active and closed sites.

In conclusion, all of the points made above apply to both active and closed landfills, thus there really is no substantial distinction that should cause CAR to allow this option for closed sites but

not active ones. The argument that including this option for active sites could make them choose a flare over energy recovery is a hollow one. Sites will continue to implement energy recovery when it makes environmental and economic sense. Allowing active sites this option under the protocol will not play into that decision in the least. Also, we are mostly talking about small, non-NSPS landfills that could qualify for credits anyway under the CAR protocol, so energy recovery may not actually be a viable option for them anyway, but flaring might if they can get the GHG credits for it.

Hopefully, this provides some clarification to the SWICS position on this issue. Thank you for your consideration.

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