

Maryland-Delaware Solid Waste Association

a chapter of the



October 30, 2020

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RE: MSW Landfill Regulations Stakeholder Group

The Maryland Delaware Solid Waste Association (MDSWA), a chapter of the National Waste and Recycling Association, is a trade association representing the private solid waste industry in the State of Maryland. Its membership includes hauling and collection companies, processing and recycling facilities, transfer stations, and disposal facilities. MDSWA appreciates the opportunity to participate in the stakeholder group that will be working with MDE as it moves forward with its initiative to bring Maryland MSW landfills into compliance with federal requirements relative to the control of methane emissions.

While MDSWA members do not currently own or operate MSW landfills in Maryland, with the exception of the landfill in Allegany County, the industry is nonetheless very interested and committed to remain actively engaged in this stakeholder process. Many of the members have MSW landfills in other States and could be a useful resource as regulations are developed. As or more important, is the concern that this regulatory process could inadvertently negatively impact rubble landfill regulatory requirements. While MDSWA understands that this initiative is related to MSW landfills and not rubble landfills, there is often a lack of understanding about the significant differences between MSW and rubble landfills with respect to emissions and a number of other indices that may be discussed with respect to MSW landfills. MDSWA looks forward to

working with the stakeholder group to assist in assuring that the regulatory structure does not create unintended requirements for rubble landfills that can not realistically be met.

Again, thank you for convening the stakeholder group and the industry looks forward to working with you to address MSW landfill emission issues.

Sincerely,

A handwritten signature in black ink that reads "Lisa Kardell". The signature is written in a cursive style with a large initial "L".

Lisa Kardell
MDSWA Chairman

Waste Management
Director, Public Affairs

cc: Benjamin Grumbles, Secretary, MDE
Horacio Tablada, Deputy Secretary
George Aburn, Jr., Director, Air and Radiation Administration
Kaley Laleker, Director, Land and Materials Administration
Ed Dexter, Administrator, Solid Waste Program
Pam Kasemeyer, Counsel, Schwartz, Metz & Wise, P.A.