

TO:

Randy Mosier
Chief, Regulation Development Division
Air and Radiation Administration
Maryland Department of the Environment
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FROM:

Concerned Maryland Residents
Submitted by Chesapeake Climate Action Network

July 21, 2021

Dear Mr. Mosier,

We are Maryland residents who are extremely concerned about climate change. Methane is a potent greenhouse gas and a driving force behind climate change. Maryland's 40 municipal solid waste (MSW) landfills are the single largest source of methane pollution in Maryland, even larger than the gas industry. It is very important to us that MDE take bold action to significantly reduce greenhouse gas emissions from MSW landfills.

As such, we support the requirements that MDE presented for discussion at its June 23 stakeholder meeting on its development of new regulations for landfills. These requirements are generally in line with the best-in-the-country regulations for landfill emissions issued in 2010 by the State of California, though they do not go as far as regulations currently proposed in the State of Oregon.

The California regulations, though the strongest in the country, are still over a decade old and Maryland should consider going above and beyond California's requirements to meet new challenges that have emerged over the past 11 years. In particular, Maryland should make sure that its regulations apply to most, if not all, of the state's 40 gas-producing landfills.

In addition, we would strongly object if MDE were to adopt weaker requirements than those discussed at the June 23 meeting. We respectfully request that MDE make all written comments on this proposal available on its website so that the public can see whether any landfill operators seek more lenient standards that will require less effective pollution controls at landfills.

MDE should also complete its rulemaking process as quickly as possible. The development of this rule has been subject to extraordinary delays, with the first meeting on the new regulations held in March 2017 and then a gap of three and a half years before MDE resumed the process. MDE should complete the process and issue a strong rule without any additional delay.

Finally, we are concerned that the State of Maryland does not appear to be instituting new composting and organic waste diversion programs, particularly in response to the recent discovery, confirmed by MDE, that Maryland landfills are producing four times more methane than it thought. The status quo is insufficient when it comes to composting and other programs for the

diversion of organic waste, particular food waste. The best way to reduce methane from landfills is to reduce the amount of organic waste that ends up in the landfills.

MDE should do everything in its power to create financial incentives to spur on the construction of new facilities that can divert waste away from landfills (and from trash incinerators, which are also highly polluting). A law passed in Maryland in 2021 requiring large generators of food waste to divert that waste away from landfills and incinerators will not be effective unless there are composting and organics diversion facilities that can accept the waste. Maryland must encourage the construction of such facilities.

Thank you for the opportunity to submit this comment today.

Sincerely,

