



MDE Must Proceed with Landfill Methane Regulations

Horacio Tablada
Secretary of the Environment
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230
horacio.tablada@maryland.gov

October 18, 2022

Dear Secretary Tablada:

Our organizations urge the Maryland Department of the Environment (MDE) to follow up on its prior commitment to reduce methane emissions from landfills and to immediately propose regulations for this purpose. The next Air Quality Control Advisory Commission (AQCAC) meeting is scheduled for October 24, 2022 and AQCAC must vote on this regulation in order for MDE to finalize it. We thank MDE and its staff who have worked diligently on these regulations. In order for those efforts to bear fruit, MDE must issue the rule.

Municipal solid waste (MSW) landfills are the largest source of methane emissions in Maryland—by far. Using the most recent 2020 data, landfills account for 40% of methane emissions in the state. The General Assembly just set an ambitious goal of achieving 60% reductions in greenhouse gas emissions by 2031 and we cannot achieve that goal without tackling this major methane source.

MDE held its first public meeting on these landfill methane regulations in 2017 and has held two stakeholder meetings since then. In 2021, MDE [told the Baltimore Sun](#) it was aiming to propose new landfill rules by the end of 2021. Three states—Oregon, Washington, and California—have now issued landfill methane rules that are much stronger than federal standards. It is time for Maryland to take up the mantle of climate leadership and do the same.

In addition to this rulemaking, MDE's Air and Radiation Administration has another major upcoming regulation on a timeline mandated by the General Assembly. By June 2023, MDE must issue *final* Building Emissions Performance Standards as required by the Climate Solutions Now Act of 2022. We urge MDE to finalize the landfill methane regulations, under consideration since 2017, so that staff can focus on this next statutorily mandated rulemaking.

In sum, we urgently request that MDE formally propose its draft MSW landfill methane rule in time for AQCAC to consider the regulation at its October 24, 2022 meeting. This rule has been under consideration since 2017 with ample time for public input. With other significant rulemakings coming due, we urge MDE to finalize this landfill methane rule so that it may focus on these other matters.

Thank you for your attention to this matter.

Respectfully Submitted,

Anne Havemann
General Counsel
Chesapeake Climate Action Network
anne@chesapeakeclimate.org
(240) 630-2146

Environmental Integrity Project

Clean Air Task Force

Maryland League of Conservation Voters

CC: *Via Email*

Chris Hoagland
Director
Air and Radiation Administration
Maryland Department of the Environment
chris.hoagland@maryland.gov

Randy Mosier
Chief
Air Quality Regulations Division
Maryland Department of the Environment
randy.mosier@maryland.gov