

SAB Biogenic Carbon Emissions Panel
March 25, 2015
Oral Comments, M. Van Brunt

Thank you for the opportunity to speak to you today on behalf of a group of municipal owners of waste-to-energy facilities, the Energy Recovery Council, and Covanta. Waste-to-energy facilities convert nearly 30 million tons of municipal solid waste (MSW) diverted from landfills into steam and/or electrical energy at 84 facilities across the country. The work of the SAB and the EPA on biogenic carbon is critical: biomass can be an important tool in our efforts to reduce GHG emissions, provided it results in real net reductions in emissions. The carbon benefits associated with the use of waste biomass is especially promising.

We have submitted written comments for your consideration, but we appreciate the opportunity to call your attention to a few specific comments today.

First, we support the alternative fate approach for waste-derived feedstocks and the inclusion of methane alongside CO₂ in the analysis. The inclusion of methane is important, both for the completeness and accuracy of the carbon balance and its significant role in climate change. However, the SAB should insist that the EPA use the latest available science from the IPCC's 5th Assessment Report with regard to methane's global warming potential, a 100-year GWP of 34 and a 20-year GWP of 84, inclusive of carbon-climate feedbacks. While we appreciate EPA's drive for consistency, our climate system and atmosphere are not bound by factors in regulations, agreements, or frameworks.

Second, illustrative examples invariably inform policy decisions, for better or for worse. Therefore, use of the latest data and information is critical for the analysis of alternate fates for waste-derived feedstocks as well. In particular, Appendix N on waste feedstocks should incorporate the agency's recently developed default landfill gas collection efficiencies already incorporated into two of the agency's models, instead of the outdated figures currently referenced. We share the concern raised by Dr. Barlaz that this framework will be used to compare waste management methods, a task that can really only be tackled by a full lifecycle assessment.

With regard to charge question 1a, the selection of temporal scale should not be selected based on the individual policy, feedstock, or landscape conditions. Instead, such a selection must be based on the timing of our overall objective in slowing the growth in the atmospheric concentrations of greenhouse gases in the atmosphere.

Regardless of the temporal scale selected, the selection of the GWP timescale must be consistent with the overall evaluation timescale. The WRI Greenhouse Gas Protocol's Policy and Action Standard, states, and I quote, "Twenty-year GWP values may be used on short-term climate drivers, and should be used if the policy or action assessed is specifically designed to reduce emissions of short-lived greenhouse gases, such as methane."

Lastly, for charge question 1c, we support the inclusion of all future fluxes into one up-front number. This will ensure that the policy signal in the form of an emissions number is aligned with the timing of the management decision.

Thank you for your consideration, and I would be happy to respond to any questions you may have at this time.