

November 15, 2023

The Honorable Joseph R. Biden, Jr.  
President of the United States  
1600 Pennsylvania Avenue, N.W.  
Washington, DC 20500

Dear President Biden:

We, the undersigned organizations, urge you to include in the United States' COP28 agenda a plan to strengthen the Environmental Protection Agency's (EPA) New Source Performance Standards (NSPS) and Emission Guidelines (EG) for municipal solid waste landfills. EPA is required to revisit the rule in August 2024, and the agency can make this commitment clear by announcing plans at COP28 to open a rulemaking to account for the latest advancements in methane prevention, mitigation and controls.

Landfills emit an estimated 295 million metric tons CO<sub>2</sub>-equivalent of methane annually, on a twenty-year warming potential time frame, equivalent to 79 coal-fired power plants running for a year. In addition, airborne direct measurements have uncovered methane plumes from many U.S. landfills, showing the problem is worse than we thought, and current control mechanisms are insufficient.

Strategies to cut landfill methane emissions – by reducing organic waste disposal and improving landfill gas collection, monitoring, and control – are well understood, readily available, and cost-effective. Several states, including California, Maryland, and Oregon have already implemented more stringent landfill methane control measures that EPA can draw from to yield significant emissions reductions. A recent EPA report found that because food waste decays relatively quickly, its emissions often occur before landfill gas collection systems are installed or expanded, estimating 50% of the carbon in food waste is degraded to landfill gas within 3.6 years. Under current EPA NSPS/EG rules, active landfills do not have to expand their gas capture and control system until the solid waste has been in place for five years. Requiring earlier installation of gas capture systems can further drive down emissions and is just one example of needed improvements to federal rules. Upstream strategies, which seek to prevent, donate, and recycle wasted food and other organic waste, are critical complementary solutions to avoid future methane generation. EPA can advance these more sustainable practices by encouraging organics diversion in an updated rule. Incineration should never be used to manage organic discard, as it is highly polluting, expensive, and carbon-intensive.

Acting expeditiously to strengthen landfill emission standards is a vital opportunity to address climate, air quality, and public health crises. In the U.S., about 3.2 million people live within one mile of a landfill, exposed to toxic air pollutants, and disproportionately that includes 1.5 million who are Black, Indigenous, or a Person of Color. Strengthening federal landfill standards now

would contribute towards realizing this Administration's commitment to environmental justice, as well as to its commitment to reducing methane emissions in both the Global Methane Pledge and the North American Leaders' Summit, along with the United States' Nationally Determined Contribution.

We thank you for your leadership in reducing climate and health-harming pollution and respectfully urge you to make landfill emissions a top priority, limiting warming and helping to safeguard the future. Thank you for your consideration of this critical issue.

Sincerely,

Advisory Committee for Environmental Sustainability, Town of Superior, Colorado

Alice Ferguson Foundation

Back to Earth Compost Crew

Beyond Toxics Oregon

BioCycle

C40 Cities Climate Leadership Group

California Alliance for Community Composting

Californians Against Waste

Cedar Lane Environmental Justice Ministry

Citizens Caring for the Future

Clean Air Task Force

Clean Water Action

Climate Reality Chicago Metro

Climate Reality Greater Maryland

Compostable Inc

CompostCoaches

Compostology Corp.

Conservation Law Foundation

Defend Our Future

Dirt Wain

Eco-Cycle

Ecology Center

Elders Climate Action Maryland

Environmental Defense Fund

Environmental Integrity Project

Food to Power

GAIA (Global Alliance for Incinerator Alternatives)

Go Green Highland Park

Go Green Morton Grove

Go Green Northbrook  
Go Green Northfield  
Go Green Winnetka  
Go Plastic Free Oak Park  
GreenBlue  
Growing Hope  
Illinois Environmental Council  
Industrious Labs  
Institute for Local Self-Reliance  
Just Zero  
Lunch out of Landfills  
Make Food Not Waste  
MASSPIRG  
Moms Clean Air Force  
Montgomery County-Faith Alliance for Climate Solutions  
Natural Resources Defense Council  
PEH Organic Recycling Inc  
Pennsylvania Jewish Earth Alliance  
Plant Chicago  
Progressive Maryland  
RMI  
Rust Belt Riders  
350 Wisconsin  
Santa Cruz Climate Action Network  
Sierra Club  
Stewards of the Potomac Highlands  
Strategy Zero Waste Solutions  
Sustain Rockford (Illinois)  
Union of Concerned Scientists  
YES Compost LLC  
Zero Waste Washington

CC: Michael Regan, Administrator, United States Environmental Protection Agency