

DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • SOLID WASTE MGMT • SURVEYOR • TRANSPORTATION

COUNTY OF SAN BERNARDINO
PUBLIC AND SUPPORT
SERVICES GROUP



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PETER H. WULFMAN
Solid Waste Division Manager

July 17, 2008

California Air Resources Board
Policy @climateregistry.org

RE: Comments regarding Draft Local Government Operations Protocol

The County of San Bernardino Solid Waste Management Division (SWMD) is providing the following comments on the Draft Local Government Operations Protocol for Greenhouse Gas Emissions:

1. Chapter 9 (Solid Waste Facilities), Section 9.3.2, Page 91, Step 3 – top of page

This Step is the first mention of applying a standard gas collection efficiency of 75% to the formulas in the protocol for establishing GHG emissions from solid waste facilities. This factor was selected as a conservative default collection efficiency based on the range of 60%-85% reported collection efficiencies in the 1998 US EPA AP-42 document (as footnoted on page 91). According to recently published literature addressing landfill gas collection system efficiencies, collection efficiencies are significantly higher than the AP-42 75 % average collection efficiency proposed for use in this protocol. The quantitative estimates supported by three different sources in the article entitled "Landfill Gas Collection System Efficiencies" by Jeremy K. O'Brien [July/August 2008 MSW Management magazine] indicate more realistic average collection efficiencies to be approximately 90%. The Solid Waste Association of North America (SWANA) has recommended that the EPA consider revising the AP-42 factors to reflect the higher LFG collection efficiencies that can be expected from MSW landfills with newer collection systems. Based on the changes in practice and technology, please reconsider the LFG system collection efficiency factor to be used in the protocol and revise to a more current accurate level.

2. If further revisions are made to the Draft Protocol or methodology of reporting, SWMD requests that we be given the opportunity to further review and comment on the revised verbiage.

Sincerely,

Peter H. Wulfman, Division Manager
Department of Public Works, Solid Waste Management Division

Cc: Grace Chan, Head, Solid Waste Mgmt. Dept., Sanitation Districts of Los Angeles County
Jan Goss, Director, Orange County Waste & Recycling
Hans Kernkamp, General Manager & Chief Engineer, Riverside County Waste Mgmt. Dept.
Nancy Sansonetti, Supervising Planner/Section Chief – Planning and Permitting Section
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