Draft Local Government Operations Protocol Comments - Stratosphere, LLC

Dear Sir/Madam:

I would like to offer the following comment on the draft LGO Protocol, Section 9.3.3, page 91.

In Section 9.3.3, the draft Protocol includes an interesting calculation concept that accounts for the methane emissions from uncovered (uncollected LFG) portions of landfills that otherwise have a collection system. While the method is an oversimplification and needs work (e.g. Equation 9.2 is incorrect), at least it offers an opportunity to customize the calculation using local landfill information rather than use the one-size-fits-all 75% collection efficiency for the entire landfill, as has been used for larger scale inventories like EPA's nationwide GHG inventory. The partial collection concept has merit and should be developed further for application in the final protocol; it should not be dropped as I understand is now under consideration.

Here's a good example where the partial collection concept is clearly superior to the whole landfill default value. Consider a new landfill that has been actively landfilling waste for up to 5 years and has a large area of active landfilling and intermediate cover. Per EPA New Source Performance Standards the operator is required to install gas collection for that portion of the landfill that has been active for 5 years or has reached final grade for 2 years. Without the partial LFG collection system concept, the operator could install gas collection for that minor portion of the site that requires it, and then could apply the protocol's default value to claim 75% LFG collection for the entire landfill, when clearly the new gas collection system is collecting gas from a small fraction of the total waste in place, the larger portion of the site still being open and active.

I realize that in California, with its stringent APCD requirements and the pending CARB Early Action Measure, partial LFG collection is less likely to be an issue. Unfortunately, California is an exception, and the LGO Protocol will apply in 49 other states, most of which are not as aggressive in dealing with landfill methane control. Since the default collection efficiency has been a debated issue, the partial collection concept allows consideration of local landfill-specific conditions while still allowing the interim use of a default value for the collected portion until more field data are available from ongoing LFG testing programs.

Thank you for the opportunity to submit this comment.

Andrew Szurgot, Principal Stratosphere, LLC