



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

FEB 25 2010

**Mr. F. Allen Barnes, Director  
Environmental Protection Division  
Georgia Department of Natural Resources  
4244 International Parkway, Suite 104  
Atlanta, GA 30354**

**Dear Mr. Barnes:**

**Thank you for bringing to our attention recent proposals in the Georgia Legislature to possibly reverse the ban on landfilling yard waste trimmings. I understand that current proposals would allow lined landfills with methane collection systems to mix yard trimmings with municipal solid waste. The stated objective of such proposals is to generate energy in the form of landfill (methane) gas. Other states are struggling with this issue, and twenty-three have enacted a ban on yard trimmings from landfills. We share your concern over the negative impacts resulting from the landfill disposal of yard trimmings.**

**As a policy matter, the United States Environmental Protection Agency (EPA) supports the continuation of landfill bans for yard trimmings and sees them as essential to ensuring that yard waste continues to find its way into reuse markets, such as composting. Federal and state environmental agencies have long supported adoption of a preferred waste management hierarchy, starting with source reduction of materials throughout design and production, recycling/composting of materials that can be reused, and finally, landfilling or combusting only those materials that cannot be managed effectively in any other way. Reversing Georgia's yard trimmings landfill ban would be inconsistent with this preferred waste management hierarchy since yard trimmings would not be recycled into potentially higher value products, but only partially converted to methane for energy, leaving residual materials in the landfill.**

**The increasing markets for compost and bans on yard trimmings disposal in landfills are some of the reasons that the national recycling rate has been increasing since the mid-1960s. Since Georgia adopted the landfill ban in 1996, over 13% of municipal solid waste has been diverted away from landfills and is being used as a feedstock for other industries. This has extended the life of landfills in Georgia, thereby reducing the costs of siting, zoning, building and maintaining new landfills in the State.**

**There are documented inefficiencies in landfilling yard trimmings to generate methane for energy. EPA strongly supports landfill gas collection systems, but they do**

not capture 100% of the methane generated inside a landfill. EPA's Landfill Methane Outreach Program estimates that gas collection systems capture 60 to 90% at various times of operation. The remainder of the methane is released into the atmosphere. Landfill gases have been viewed historically as local nuisances. We now know these gases have the potential to impact our environment today and in the future. The methane gas (CH<sub>4</sub>) produced by landfills has over 20 times the greenhouse gas (GHG) potential of carbon dioxide (CO<sub>2</sub>) generated by composting. One way to reduce waste disposal's negative impact on the atmosphere is to reduce the releases of landfill methane, by both putting less methane-generating materials into landfills and converting the remaining CH<sub>4</sub> produced, by combustion, into CO<sub>2</sub>, with its lower GHG pollution potential. Again, EPA encourages efforts to capture landfill methane from existing (and closed) landfills for energy production. However, EPA does not support adding organic wastes to landfills in hopes of creating waste-to-energy facilities.

It is also worth noting that the economic activity generated by recycling is significant. In 2002, EPA found in its Recycling Economic Information study that five times as many people were employed in the recycling/reuse industries than in the waste management industry and that a recycling industry employee is paid about \$1,500 more in wages than one in the waste industry. Composters and other recyclers of organic waste are generating high value products used to support a variety of important industries, such as agriculture, horticulture, landscaping, stormwater management, and erosion control.

Thank you for the opportunity to discuss this issue. If you have any questions, please feel free to contact either myself or Jon Johnston at 404-562-8527.

Sincerely,

A handwritten signature in black ink that reads "Alan Farmer". The signature is written in a cursive, flowing style.

G. Alan Farmer, Director  
RCRA Division