



February 11, 2004

U.S. Department of Energy  
*Submitted via Internet*

**RE:** Revised General Guidelines for the Reporting of Greenhouse Gas Emissions and Emission Reductions under Section 1605(b) of the National Energy Policy Act

Dear Sir or Madam:

The Solid Waste Association of North America (SWANA) is pleased to offer the following comments in response to the above-referenced U.S. Department of Energy General Guidelines for Reporting of Greenhouse Gas Emissions under Section 1605(b) of the National Energy Policy Act.

SWANA is a not-for-profit association comprised of approximately 7,000 solid waste professionals representative of local governments and companies across the U.S. and Canada involved in all aspects of responsible municipal solid waste management practices. SWANA has an interest in this proceeding as the Association represents a broad cross-section of public and private waste-to-energy plant owner/operators that provide waste disposal and energy generation services to numerous cities and communities across the country.

The 98 waste-to-energy plants operating in 29 states handle 14% of the municipal waste stream in the U.S. and provide electricity to 2.3 million homes while meeting the trash disposal needs of more than 36 million people. These facilities meet some of the most stringent environmental standards in the power industry and employ the most advanced air pollution equipment available to curb the release of dangerous emissions. Moreover, waste-to-energy reduces harmful greenhouse gas emissions, increases fuel diversity with less reliance on non-renewable fossil fuels, and supports recycling. For example, communities where waste-to-energy plants are located have an average recycling rate of 33%, as compared with the national recycling rate of 30%.

Together with our partnering organization, the Integrated Waste Services Association (IWSA), SWANA supports the position that the proposed Guidelines issued by the U.S. Department of Energy appear to disavow any method that would account for the significant, quantifiable avoided emissions from the operation of waste-to-energy facilities. Specifically, we urge U.S.

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DOE to account for the benefits of waste-to-energy and the reductions in greenhouse gas and other harmful emissions attributed to this technology. For example, a life-cycle analysis prepared by the U.S. Environmental Protection Agency, entitled *The Impact of Municipal Solid Waste Management on Greenhouse Gas Emissions in the United States*, documents the significant contribution made by waste-to-energy in reducing the amount of greenhouse gases that would otherwise be released into our atmosphere in the absence of the technology. Waste-to-energy reduces more than forty million metric tons of greenhouse gases in the form of carbon dioxide equivalents that otherwise would be released into the atmosphere on an annual basis, according to an analysis developed by the U.S. Environmental Protection Agency and IWSA using EPA's Decision Support Tool program.

SWANA supports the view of IWSA and other stakeholders that the previous DOE 1605(b) program defines greenhouse gas reductions attributable to waste-to-energy as those stemming from the avoidance of landfilling waste (and the resultant methane production) and generation of electricity (and the resultant carbon dioxide emissions from power plants). Using this formula, DOE was able to quantify the amount of greenhouse gases that would have been released if trash had not been used as fuel in a waste-to-energy plant. The current and proposed DOE 1605(b) program approach is incorrect because it refuses to admit that greenhouse gas reductions from waste-to-energy operations may be realized within the context of overall solid waste management practices. On behalf of its membership, SWANA urges DOE to take credit for waste-to-energy emissions reductions, and further urge DOE's acceptance of the EPA life-cycle approach and the underlying computer model used to calculate reductions. For more information, please contact Susan Thorneloe at U.S. EPA's Air Pollution Prevention and Control Division, Office of Research and Development in Research Triangle Park, North Carolina at (919) 541- 2709.

Finally, on a related issue, SWANA also believes that credits should be owned by the entity owning a waste-to-energy facility and we urge U.S. DOE to accept this recommendation. More than half of America's waste-to-energy plants are owned by municipalities and any benefits associated with these facilities – including greenhouse gas emissions credits – should accrue to the communities that own a facility. Similarly, private operators that worked to design and build waste-to-energy plants took on significant risk and should be offered the reward of operating clean, efficient plants. We oppose assignment of greenhouse gas credits to either the supplier of trash or the ultimate purchaser of electricity.



Thank you in advance for consideration of our views. We look forward to working with U.S. DOE on this very important issue.

Respectfully submitted,

A handwritten signature in black ink, which reads "John H. Skinner". The signature is written in a cursive style with a large, stylized initial "J".

John H. Skinner, Ph.D.  
SWANA Executive Director and CEO