



**SWANA**<sup>®</sup>

SOLID WASTE ASSOCIATION  
of North America

1100 Wayne Ave. Suite 700  
Silver Spring, MD 20910

January 22, 2009

The Honorable Ron Wyden  
United States Senator  
Washington, DC 20515

Dear Senator Wyden,

On behalf of the Solid Waste Association of North America (SWANA) I am writing to offer our support for your amendment to create parity among renewable sources within the section 45 production tax credit. Credit rate equality for landfill gas and waste-to-energy will provide important incentives for these technologies. Your amendment shows a true commitment to developing *all* sources of renewable energy, reducing greenhouse gases and fossil fuel consumption, as well as promoting homegrown sources of energy.

SWANA is a not-for-profit professional association with over 8,000 members from both the public and private sectors of the solid waste industry. Our mission is to advance the practice of environmentally and economically sound management of municipal solid waste (MSW) in North America. We believe that improved solid waste management practices like landfill gas recovery and use and waste-to-energy can significantly reduce the emission of greenhouse gases that contribute to global warming and climate change.

Landfill gas and waste-to-energy are both valuable resources for producing clean, renewable energy, and reducing greenhouse gas emissions. As reliable, baseload electricity generators, landfill gas and waste-to-energy are valuable parts of any renewable portfolio. Due to their environmental benefits in reducing fossil fuel reliance and greenhouse gas emissions, the MWs of electricity produced from these projects should be valued at the same amount as MWs of electricity produced from any other eligible renewable energy projects.

Landfill gas recovery and utilization provide valuable opportunities for GHG reduction. Landfill gas methane (which has a high global warming potential – 23 times that of CO<sub>2</sub>) can be collected in high efficiency gas collection systems. The methane can then be destroyed by combusting the collected gas in flares, or using it as a fuel in engines or furnaces for energy recovery.

Landfill gas combusted in engine-generator sets can produce electricity. Alternatively the gas can be used directly as a fuel for heating or other industrial uses or can be further processed and used as a vehicle fuel. Currently, there are 445 operational landfill gas to energy projects in the U.S., which create 1,180 megawatts (MW) of electricity and 236 million metric standard cubic feet per day (MMSCFD) of renewable fuel. However, there are many more landfills in the U.S. that have the potential to capture and utilize landfill gas. EPA identifies 535 candidate landfills that have the potential for landfill gas to energy projects.



Waste-to-energy refers to the controlled combustion of solid waste in modern furnaces with state-of-the-art pollution controls. The energy can be recovered in the form of electricity or steam. WTE is classified as a renewable energy source according to the Environmental Protection Agency and under the Energy Policy Act of 2005. The waste that is combusted by waste-to-energy facilities is primarily biomass, a renewable resource.

Waste-to-energy also offers significant potential for reducing GHG emissions. WTE offsets landfill methane emissions by diverting wastes from landfills. It also creates a clean source of energy that offsets energy produced from the burning of fossil fuels. Currently, there are 87 waste-to-energy facilities in the United States, producing 2,700 MW of electricity. Waste-to-energy has a long history of being a reliable energy source in the U.S. and around the world.

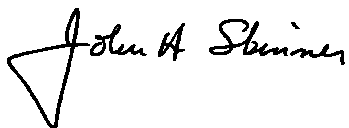
Waste-to-energy is a clean form of renewable energy. Under the Clean Air Act, waste-to-energy facilities meet very stringent air emission requirements using advanced control technology. According to EPA in 2003, U.S. waste-to-energy plants have shown "dramatic decreases" in air emissions, and produce electricity "with less environmental impact than almost any other source of electricity." EPA also estimates that waste-to-energy prevents the release of 33 million metric tons of carbon dioxide annually.

Providing credit rate parity to landfill gas operations and waste-to-energy facilities, in conjunction with an extended placed-in-service date, will provide important financial incentives that will support the development of new capacity. Investment in new LFG and WTE capacity will yield an excellent return on its investment. Waste-to-energy facilities, for example, are major solid waste infrastructure projects that will provide a significant number of good jobs. For instance, a 1,500 ton per day waste-to-energy facility could require an investment of \$350 million and would provide 50 to 60 high-paying full-time jobs for a period of 40 to 50 years, in addition to the construction jobs it created. This will have a significant impact on the local economies in which these facilities are sited.

We appreciate your recognition that landfill gas and waste-to-energy produce clean, renewable energy and are an important component of America's renewable and economic policies.

Thank you again for your commitment to developing all sources of renewable energy, and please do not hesitate to contact us if we can provide any further input.

Sincerely,

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

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