

Date: Fri, 01 Aug 2025 15:48:06 -0400
To: Scott McGrath <scott.mcgrath@phila.gov>, Office of Sustainability <sustainability@phila.gov>
From: Mike Ewall <mike@energyjustice.net>
Subject: Response to Solid Waste RFI -- Addendum

Dear Scott and Office of Sustainability Staff,

Please allow me to supplement my response with a bit of additional information that you should find relevant.

Two points:

- 1) Republic is the nation's second largest waste disposal corporation, after WM (formerly Waste Management). They have two trash transfer stations in the city with adequate capacity: Quickway (2960 E Orthodox St) and Envirowaste (13 Pattison Ave). Their closest two landfills are Conestoga Landfill in Berks County (which is relatively close and conveniently right off of the PA Turnpike), and Modern Landfill in York County (which I believe is in the process of having an expansion permit approved). They have the capacity to take a significant portion of Philadelphia's trash -- I believe they can handle about 1/3rd of the city's MSW, which is the proportion that Reworld (Covanta) currently accepts.
- 2) Landfill gas is a complex issue with much research into it over the years. So-called "landfill gas-to-energy" (burning landfill gas one way or another, usually on-site... or near-site as WM does in Bucks County) is not the climate benefit most think it is. Research has shown that landfills that are managed for energy production (trying to maximize gas formation and crank up the methane concentration in the gas in ways that minimized gas collection) can be worse than simply flaring the gas, even when accounting for fossil fuels displaced by any electricity generated. It's a complex matter, but please do not simply accept landfill company claims that it's beneficial to be burning gas for energy. EPA regulations require that landfills collect their gas if they estimate more than a certain amount of chemical releases in the gas, so it's not a choice between burning it for energy or letting it all leak out. It's a choice between burning one way or another... and flaring is actually LESS harmful than using for energy if the landfill is managed in ways that do not actively minimize gas formation (which can also help maximize collection efficiency). Furthermore, landfills do a poor job of monitoring their gas leaks, but this can be improved with modern technology such as sniffer drones (instead of having a person try to walk the full landfill in a zig-zag to cover the whole surface area, some of which isn't navigable. I have some info on the topic at <https://www.energyjustice.net/lfg> (most of the best stuff is not on that page, but in the links from the top section). As I mentioned in my initial RFI response, there is also guidance on best landfill management practices in the end of the Zero Waste Hierarchy here: <https://energyjustice.net/zerowaste/hierarchy/>

Some of the newest info on landfill gas leak monitoring can be found in materials from Beyond Toxics and Industrious Labs:

<https://www.beyondtoxics.org/wp-content/uploads/Oregons-Secret-Climate-Killers.pdf>
<https://industriouslabs.org/archive/turning-down-the-heat>
<https://industriouslabs.org/archive/press-release-common-sense-standards-can-deliver-cleaner-air-cut-california-landfill-methane>
<https://industriouslabs.org/archive/epa-takes-steps-to-address-underreporting-of-landfill-methane-emissions>
<https://www.wastedive.com/news/epa-clean-air-act-landfill-methane-gas-collection-cover-materials/730489/>
<https://bit.ly/GoldenOpportunityReport>
<https://cdn.sanity.io/files/xdiws328/production/657706be7f29a20fe54692a03dbedce8809721e8.pdf>

I mention the info on landfill gas in case best practices for landfill management are worked into any disposal RFP. I'm happy to answer further questions on it.

Thank you again for the opportunity to respond to this RFI.

All the best,
Mike

At 06:59 PM 7/31/2025, Mike Ewall wrote:

Dear Scott and Office of Sustainability Staff,

Please find Energy Justice Network's response to the Solid Waste RFI attached, and please confirm receipt.

Most appreciated for this opportunity and for your review,

Mike Ewall, Esq.
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