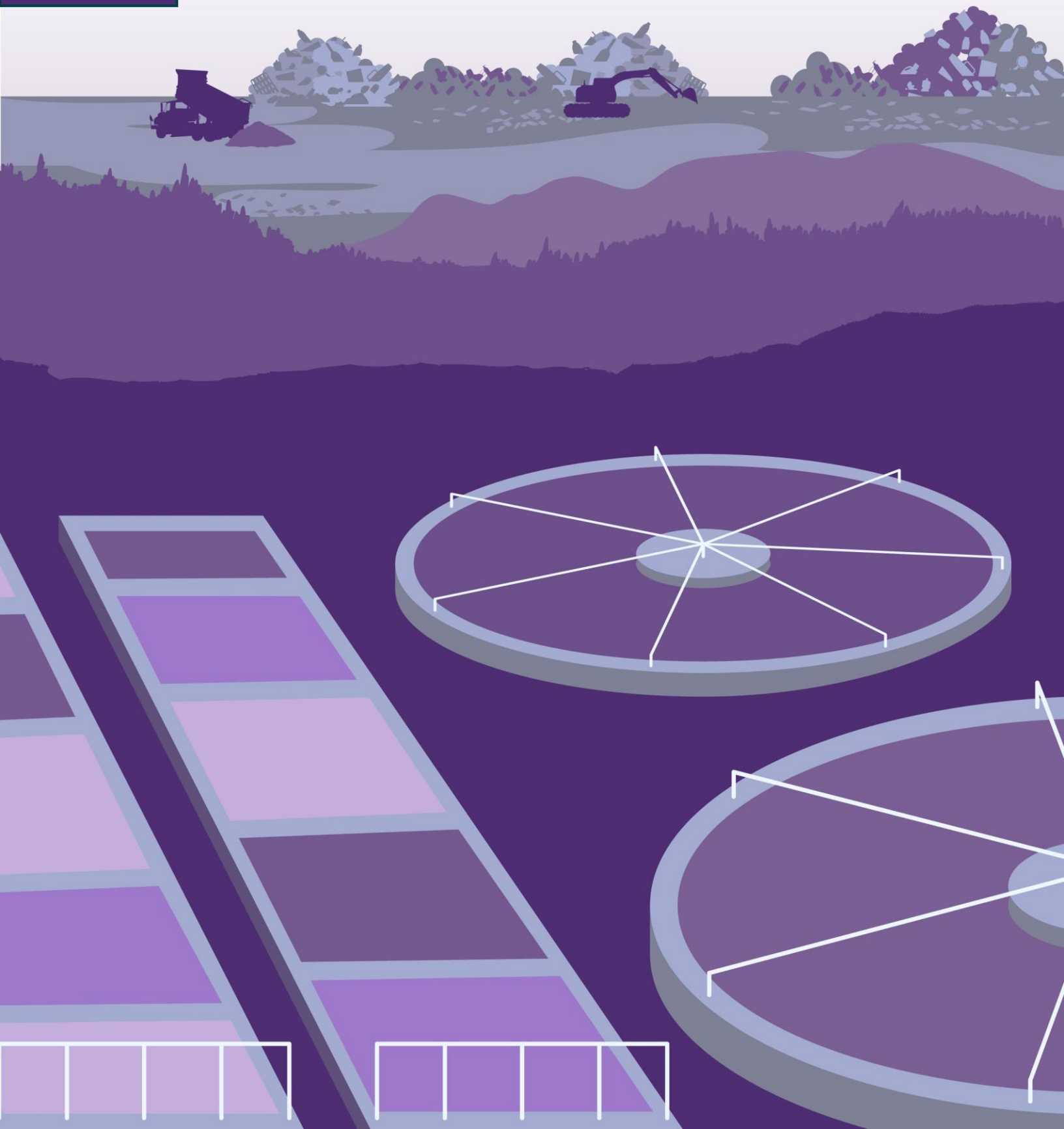


# 7

# Waste

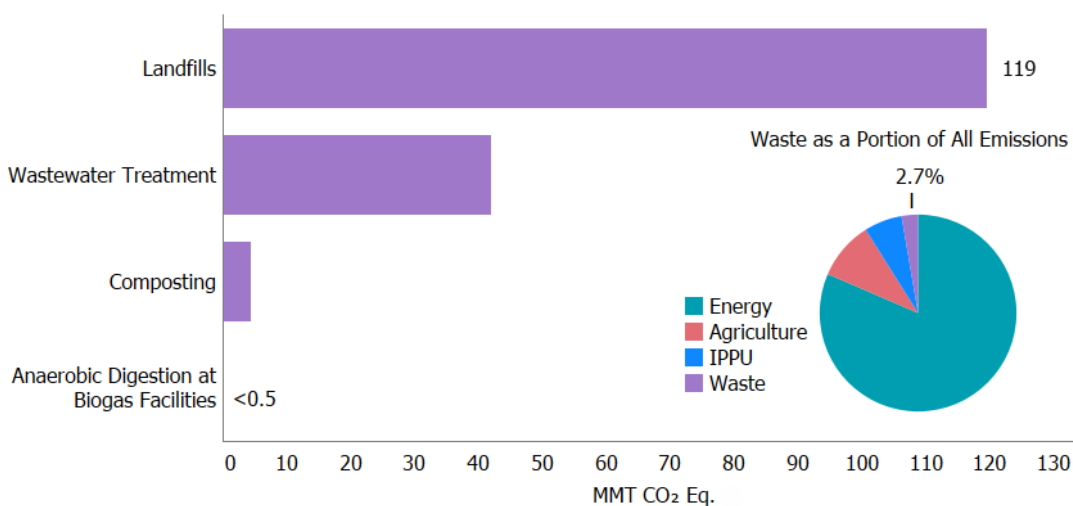


# 7 Waste

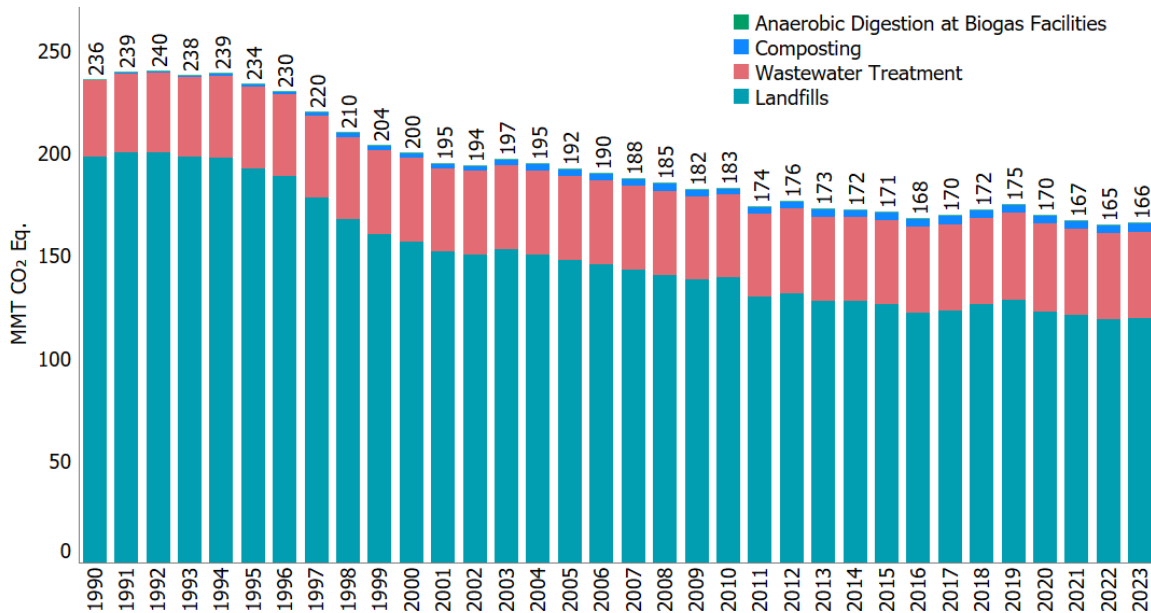
Waste management and treatment activities are sources of greenhouse gas emissions (see Figure 7-1 and Figure 7-2). Landfills were the third largest source of anthropogenic methane (CH<sub>4</sub>) in the United States in 2023, accounting for approximately 17.4 percent of total U.S. CH<sub>4</sub> emissions. Additionally, wastewater treatment and discharge, composting of organic waste, and anaerobic digestion at biogas facilities accounted for approximately 3.1 percent, 0.4 percent, and less than 0.1 percent of U.S. CH<sub>4</sub> emissions, respectively. Nitrous oxide (N<sub>2</sub>O) emissions result from the discharge of wastewater treatment effluents into aquatic environments were estimated, along with the wastewater treatment process itself and composting. Together, these waste activities account for 5.9 percent of total U.S. N<sub>2</sub>O emissions. Nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and non-CH<sub>4</sub> volatile organic compounds (NMVOCs) are emitted by waste activities and are addressed separately at the end of this chapter. A summary of greenhouse gas emissions from the Waste sector is presented in Table 7-1 and Table 7-2. Overall, in 2023, waste activities generated emissions of 165.8 MMT CO<sub>2</sub> Eq., or 2.7 percent of total U.S. greenhouse gas emissions.

Emissions from landfills contributed 72.0 percent of Waste sector emissions in 2023 (see Figure 7-1) and are primarily composed of CH<sub>4</sub> emissions from municipal solid waste landfills. Landfill emissions increased by 0.8 MMT CO<sub>2</sub> Eq. (0.7 percent) since 2022. Emissions from wastewater treatment were the second largest source of waste-related emissions in 2023, accounting for 25.3 percent of sector emissions. Wastewater emissions remained relatively unchanged at just 0.1 percent below 2022 levels. The remaining two sources of emissions, composting and anaerobic digestion at biogas facilities, account for 2.7 percent and less than 0.1 percent of Waste sector emissions in 2023, respectively.

**Figure 7-1: 2023 Waste Sector Greenhouse Gas Sources**



**Figure 7-2: Trends in Waste Sector Greenhouse Gas Sources**



**Table 7-1: Emissions from Waste (MMT CO<sub>2</sub> Eq.)**

Gas/Source	1990	2005	2019	2020	2021	2022	2023
<b>CH<sub>4</sub></b>	<b>220.9</b>	<b>172.4</b>	<b>151.9</b>	<b>146.1</b>	<b>143.9</b>	<b>142.2</b>	<b>143.2</b>
Landfills	197.8	147.7	128.2	122.6	120.7	118.7	119.5
Wastewater Treatment	22.7	22.7	21.1	21.0	20.7	20.9	21.1
Composting	0.4	2.1	2.5	2.6	2.6	2.6	2.6
Anaerobic Digestion at Biogas Facilities	+	+	+	+	+	+	+
<b>N<sub>2</sub>O</b>	<b>15.1</b>	<b>19.5</b>	<b>22.9</b>	<b>23.6</b>	<b>23.1</b>	<b>22.9</b>	<b>22.6</b>
Wastewater Treatment	14.8	18.1	21.1	21.8	21.3	21.1	20.8
Composting	0.3	1.5	1.8	1.8	1.8	1.8	1.8
<b>Total</b>	<b>235.9</b>	<b>192.0</b>	<b>174.8</b>	<b>169.7</b>	<b>167.0</b>	<b>165.1</b>	<b>165.8</b>

+ Does not exceed 0.5 kt.

Note: Totals may not sum due to independent rounding.

**Table 7-2: Emissions from Waste (kt)**

Gas/Source	1990	2005	2019	2020	2021	2022	2023
<b>CH<sub>4</sub></b>	<b>7,889</b>	<b>6,159</b>	<b>5,424</b>	<b>5,219</b>	<b>5,140</b>	<b>5,078</b>	<b>5,114</b>
Landfills	7,063	5,275	4,578	4,379	4,310	4,238	4,266
Wastewater Treatment	811	809	755	748	738	747	755
Composting	15	75	91	92	92	92	93
Anaerobic Digestion at Biogas Facilities	+	+	1	1	1	1	1
<b>N<sub>2</sub>O</b>	<b>57</b>	<b>74</b>	<b>87</b>	<b>89</b>	<b>87</b>	<b>86</b>	<b>85</b>
Wastewater Treatment	56	68	80	82	80	80	79
Composting	1	6	7	7	7	7	7

+ Does not exceed 0.5 kt.

Note: Totals by gas may not sum due to independent rounding.

Carbon dioxide (CO<sub>2</sub>), CH<sub>4</sub>, and N<sub>2</sub>O emissions from the incineration of waste are accounted for in the Energy sector rather than in the Waste sector because almost all incineration of municipal solid waste (MSW) in the United States occurs at waste-to-energy facilities where useful energy is recovered. Similarly, the Energy sector also includes an estimate of emissions from burning waste tires and hazardous industrial waste, because virtually all of the combustion occurs in industrial and utility boilers that recover energy. The incineration of waste in the United States in 2023 resulted in 12.8 MMT CO<sub>2</sub> Eq. emissions, more than half of which is attributable to the combustion of plastics. For more details on emissions from the incineration of waste, see Section 7.5. Greenhouse gas precursor emissions from the Waste sector are presented in Section 7.6.

Each year, some emission and sink estimates in the *Inventory* are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous *Inventory's* time series (i.e., 1990 to 2022) to ensure that the trend is accurate. For the current *Inventory*, minor improvements were implemented beyond routine activity data updates, including changes to MSW and industrial waste landfill activity data, updates to production activity affecting wastewater influent, and updates to the amount of waste processed by anaerobic digesters. In total, the methodological and historic data improvements made to the Waste sector in this *Inventory* resulted in an average decrease in greenhouse gas emissions across the time series by 0.3 MMT CO<sub>2</sub> Eq. (0.19 percent). For more information on specific methodological updates, please see the Recalculations Discussion section for each category in this chapter.

The estimates for the waste sector are largely complete. Emissions associated with sludge generated from the treatment of industrial wastewater are not estimated due to the likely insignificant level of emissions and the lack of relevant data. Emissions reported in the Waste chapter for landfills, wastewater treatment, and anaerobic digestion at biogas facilities include those from all 50 states, including Hawaii and Alaska, the District of Columbia, U.S. Territories, and tribal lands to the extent they are occurring. Emissions from landfills include modern, managed sites in most U.S. Territories except for outlying Pacific Islands. Emissions from domestic wastewater treatment include most U.S. Territories except for outlying Pacific Islands. Those emissions are likely insignificant as those outlying Pacific Islands (e.g., Baker Island) have no permanent population. No industrial wastewater treatment emissions are estimated for U.S. Territories, due to lack of data availability. However, industrial wastewater treatment emissions are not expected for outlying Pacific Islands and assumed to be small

for other U.S. Territories. Emissions for composting include Puerto Rico and all states except Alaska. Some composting operations in Alaska are known, but these consist of aerated composting facilities. Composting emissions are not included from the remaining U.S. Territories, and these are assumed to be small. Similarly, EPA is not aware of any anaerobic digestion at biogas facilities in U.S. Territories but will review this on an ongoing basis to include these emissions if they are occurring. See Annex 5 for more information on EPA's assessment of the sources not included in this *Inventory*.

### Box 7-1: Use of Greenhouse Gas Reporting Data in Waste Sector

EPA also collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP). The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial greenhouse gas suppliers, and facilities that inject CO<sub>2</sub> underground for sequestration or other reasons and requires reporting by sources or suppliers in 46 industrial categories. Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases. In general, the threshold for reporting is 25,000 metric tons or more of CO<sub>2</sub> Eq. per year. See Annex 9 “Use of EPA Greenhouse Gas Reporting Program in *Inventory*” for more information.

#### Waste Data from EPA's Greenhouse Gas Reporting Program

EPA uses annual GHGRP facility-level data in the Landfills category to compile the national estimate of emissions from Municipal Solid Waste (MSW) landfills (see Section 7.1 of this chapter for more information). EPA uses directly reported GHGRP data for net CH<sub>4</sub> emissions from MSW landfills for the years 2010 to 2023 of the *Inventory*. MSW landfills subject to the GHGRP began collecting data in 2010. These data are also used to recalculate emissions from MSW landfills for the years 2005 to 2009 to ensure time-series consistency.

## 7.1 Landfills (Source Category 5A1)

In the United States, solid waste is managed by landfilling, recovery through recycling or composting, and combustion through waste-to-energy facilities. Disposing of solid waste in modern, managed landfills is the most used waste management technique in the United States. More information on how solid waste is collected and managed in the United States is provided in Box 7-3. The municipal solid waste (MSW) and industrial waste landfills referred to in this section are all modern landfills that must comply with a variety of regulations as discussed in Box 7-2. Disposing of waste in illegal dumping sites is not considered to have occurred in years later than 1980 and these sites are not considered to contribute to net emissions in this section for the timeframe of 1990 to the current *Inventory* year. MSW landfills, or sanitary landfills, are sites where MSW is managed to prevent or minimize health, safety, and environmental impacts. Waste is deposited in different cells and covered daily with soil; many have environmental monitoring systems to track performance, collect leachate, and collect landfill gas. Industrial waste landfills are constructed in a similar way as MSW landfills, but are used to dispose of industrial solid waste, such as RCRA Subtitle D wastes (e.g., non-hazardous industrial solid waste defined in Title 40 of the Code of Federal Regulations [CFR] in section 257.2), commercial solid wastes, or conditionally exempt small-quantity generator wastes (EPA 2016a).

After being placed in a landfill, organic waste (such as paper, food scraps, and yard trimmings) is initially decomposed by aerobic bacteria. After the oxygen has been depleted, the remaining waste is available for consumption by anaerobic bacteria, which break down organic matter into substances such as cellulose, amino acids, and sugars. These substances are further broken down through fermentation into gases and short-chain organic compounds that form the substrates for the growth of methanogenic bacteria. These CH<sub>4</sub> producing anaerobic bacteria convert the fermentation products into stabilized organic materials and biogas consisting of approximately 50 percent biogenic carbon dioxide (CO<sub>2</sub>) and 50 percent CH<sub>4</sub>, by volume. Landfill biogas also contains trace amounts of non-methane organic compounds (NMOC) and volatile organic compounds (VOC) that either result from decomposition byproducts or volatilization of biodegradable wastes (EPA 2008).

### Box 7-2: Description of a Modern, Managed Landfill in the United States

Modern, managed landfills are well-engineered facilities that are located, designed, operated, and monitored to ensure compliance with federal, state, and tribal regulations. A modern, managed landfill is EPA's interpretation of the IPCC's terminology of a managed solid waste disposal site. Municipal solid waste (MSW) landfills must be designed to protect the environment from contaminants which may be present in the solid waste stream. Additionally, many new landfills collect and destroy landfill gas through flares or landfill gas-to-energy projects. Requirements for affected MSW landfills may include:

- Siting requirements to protect sensitive areas (e.g., airports, floodplains, wetlands, fault areas, seismic impact zones, and unstable areas);
- Design requirements for new landfills to ensure that Maximum Contaminant Levels (MCLs) will not be exceeded in the uppermost aquifer (e.g., composite liners and leachate collection systems);
- Leachate collection and removal systems;
- Operating practices (e.g., daily and intermediate cover, receipt of regulated hazardous wastes, use of landfill cover material, access options to prevent illegal dumping, use of a collection system to prevent stormwater run-on/run-off, record-keeping);
- Air monitoring requirements (explosive gases);
- Groundwater monitoring requirements;
- Closure and post-closure care requirements (e.g., final cover construction); and
- Corrective action provisions.

Specific federal regulations that affected MSW landfills must comply with include the 40 CFR Part 258 (Subtitle D of RCRA), or equivalent state regulations, the NSPS 40 CFR Part 60 Subparts WWW and XXX, and the EG 40 CFR Part 62 Subpart Cf.<sup>1</sup> Additionally, state and tribal requirements may exist.

Methane and CO<sub>2</sub> are the primary constituents of landfill gas generation and emissions. Net carbon dioxide flux from carbon stock changes of materials of biogenic origin in landfills are estimated and reported under the Land Use, Land-Use Change, and Forestry (LULUCF) sector (see Chapter 6 of this *Inventory*). Nitrous oxide (N<sub>2</sub>O) emissions from the disposal and application of sewage sludge on landfills are also not explicitly modeled as part of greenhouse gas emissions from landfills. Nitrous

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<sup>1</sup> For more information regarding federal MSW landfill regulations, see <https://www.epa.gov/landfills/municipal-solid-waste-landfills#regs> and <https://www.epa.gov/stationary-sources-air-pollution/municipal-solid-waste-landfills-national-emission-standards>.

oxide emissions from sewage sludge applied to landfills as a daily cover or for disposal are expected to be relatively small because the microbial environment in an anaerobic landfill is not very conducive to the nitrification and denitrification processes that result in N<sub>2</sub>O emissions. Furthermore, the *2006 IPCC Guidelines* did not include a methodology for estimating N<sub>2</sub>O emissions from solid waste disposal sites “because they are not significant.” Therefore, only CH<sub>4</sub> generation and emissions are estimated for landfills under the Waste sector.

Methane generation and emissions from landfills are a function of several factors, including: (1) the total amount and composition of waste-in-place, which is the total waste landfilled annually over the operational lifetime of a landfill; (2) the characteristics of the landfill receiving waste (e.g., size, climate, cover material); (3) the amount of CH<sub>4</sub> that is recovered and either flared or used for energy purposes; and (4) the amount of CH<sub>4</sub> oxidized as the landfill gas—that is not collected by a gas collection system—passes through the cover material into the atmosphere. Each landfill has unique characteristics, but all managed landfills employ similar operating practices, including the application of a daily and intermediate cover material over the waste being disposed of in the landfill to prevent odor and reduce risks to public health. Based on recent literature, the specific type of cover material used can affect the rate of oxidation of landfill gas (RTI 2011). The most used cover materials are soil, clay, and sand. Some states also permit the use of green waste, tarps, waste derived materials, sewage sludge or biosolids, and contaminated soil as a daily cover. Methane production typically begins within the first year after the waste is disposed of in a landfill and will continue for 10 to 50 or more years as the degradable waste decomposes over time.

In 2023, landfill CH<sub>4</sub> emissions were approximately 119.5 MMT CO<sub>2</sub> Eq. (4,266 kt), representing the third largest source of CH<sub>4</sub> emissions in the United States, behind enteric fermentation and natural gas systems. Emissions from MSW landfills accounted for approximately 84 percent of total landfill emissions (100.6 MMT CO<sub>2</sub> Eq.), while industrial waste landfills accounted for the remainder (18.9 MMT CO<sub>2</sub> Eq.). Nationally, there are significantly less industrial waste landfills compared to MSW landfills, which contributes to the lower national estimate of CH<sub>4</sub> emissions for industrial waste landfills. Additionally, the average organic content of waste streams disposed in industrial waste landfills is lower than MSW landfills. Present estimates of operational (open and accepting waste) MSW landfills in the United States have ranged from 1,200 to 1,750 facilities (EPA 2024a; EPA 2024b; EPA 2020b; EPA 2019; Waste Business Journal [WBJ] 2016; WBJ 2010). The Environment Research & Education Foundation (EREF) conducted a nationwide analysis of MSW management and counted 1,540 operational MSW landfills in 2013 (EREF 2016). Conversely, there are approximately 3,200 MSW landfills in the United States that have been closed since 1980 (for which a closure data is known, (EPA 2024b; WBJ 2010). While the number of active MSW landfills has decreased significantly over the past 20 years, from approximately 6,326 in 1990 to as few as 1,540 in 2013, the average landfill size has increased (EPA 2024b; EREF 2016; BioCycle 2010). Larger landfills may have deeper cells where a greater amount of area will be anaerobic (more CH<sub>4</sub> is generated in anaerobic versus aerobic areas) and larger landfills tend to generate more CH<sub>4</sub> compared to a smaller landfill (assuming the same waste composition and age of waste). Regarding industrial waste landfills, the WBJ database includes approximately 1,100 landfills accepting industrial and/or construction and demolition debris for 2021 (WBJ 2021). Only 169 facilities with industrial waste landfills met the reporting threshold under Subpart TT (Industrial Waste Landfills) in the first year (2011) of EPA’s Greenhouse Gas Reporting Program for this subpart (GHGRP codified in 40 CFR Part 98), indicating that there may be several hundred industrial waste landfills that are not required to report under EPA’s GHGRP. Less industrial waste landfills meet the GHGRP eligibility

threshold because they typically accept waste streams with low to no organic content, which will not decompose and generate CH<sub>4</sub> when disposed.

The annual amount of MSW generated and subsequently disposed of in MSW landfills varies annually and depends on several factors (e.g., the economy, consumer patterns, recycling and composting programs, inclusion in a garbage collection service). The estimated annual quantity of waste placed in MSW landfills increased 10 percent from approximately 205 MMT in 1990 to 226 MMT in 2000, then decreased by 11 percent to 202 MMT in 2010, and then increased by 8 percent to approximately 218 MMT in 2023 (see Annex 3.15, Table A-213). Emissions decreased between 1990 to 2023 largely because of increased use of landfill gas collection and control systems, closure of older landfills, better management practices, and increased diversion of organics through state and local policy and regulations. The total amount of MSW generated is expected to increase as the U.S. population continues to grow. The quantities of waste landfilled for 2014 to 2023 (presented in Annex 3.15) are extrapolated based on population growth and the last comprehensive national assessment of MSW landfilled from 2013 (EREF 2016). Net CH<sub>4</sub> emissions from MSW landfills have decreased since 1990 (see Table 7-3 and Table 7-4).

The estimated quantity of waste placed in industrial waste landfills (from the pulp and paper, and food processing sectors) has remained relatively steady since 1990, ranging from 9.7 MMT in 1990 to 10.7 MMT in 2023 (see Annex 3.15, Table A-213). CH<sub>4</sub> emissions from industrial waste landfills have also remained at similar levels recently, ranging from 16.1 MMT CO<sub>2</sub> Eq. in 2005 to 18.9 MMT CO<sub>2</sub> Eq. in 2023 when accounting for both CH<sub>4</sub> generation and oxidation. The EPA has focused the industrial waste landfills source category on industrial sectors known to generate and dispose of by-products that are organic and contribute to CH<sub>4</sub> generation, which are the pulp and paper and food processing sectors. Construction and demolition (C&D) landfills, another type of industrial waste landfill, may accept waste that could degrade (e.g., treated wood), but these waste streams are unlikely to generate significant amounts of CH<sub>4</sub> and are therefore not as relevant to the purpose of national greenhouse gas emissions estimate. There is also a general lack of data on annual quantities of waste disposed in industrial waste landfills, and the GHGRP Subpart TT (Industrial Waste Landfills) dataset has confirmed C&D landfills, for example, are insignificant CH<sub>4</sub> generators.

EPA's Landfill Methane Outreach Program (LMOP) collects information on landfill gas energy projects currently operational or under construction throughout the United States. LMOP's Landfill and Landfill Gas Energy Database contains information on the gas collection and control systems in place at landfills provided by organizations that are a part of the program, which can include the amount of landfill gas collected and flared. In 2023, LMOP identified 22 new landfill gas-to-energy (LFGE) projects (EPA 2024a) that began operation.

Landfill gas collection and control is not accounted for at industrial waste landfills in this chapter (see the Methodology discussion for more information).

**Table 7-3: CH<sub>4</sub> Emissions from Landfills (MMT CO<sub>2</sub> Eq.)**

Activity	1990	2005	2019	2020	2021	2022	2023
MSW CH <sub>4</sub> Generation <sup>a</sup>	230.0	303.7	340.3	339.4	334.1	329.3	335.2
Industrial CH <sub>4</sub> Generation	13.6	17.9	20.9	21.0	21.0	21.0	21.0
MSW CH <sub>4</sub> Recovered <sup>a</sup>	(23.8)	(148.4)	(201.5)	(206.4)	(203.4)	(200.0)	(204.9)
MSW CH <sub>4</sub> Oxidized <sup>a</sup>	(20.6)	(23.6)	(29.4)	(29.3)	(28.9)	(29.5)	(29.8)

Industrial CH <sub>4</sub> Oxidized	(1.4)	(1.8)	(2.1)	(2.1)	(2.1)	(2.1)	(2.1)
MSW net CH <sub>4</sub> Emissions	185.5	131.6	109.4	103.7	101.8	99.8	100.6
Industrial CH <sub>4</sub> Emissions <sup>b</sup>	12.2	16.1	18.8	18.9	18.9	18.9	18.9
<b>Total</b>	<b>197.8</b>	<b>147.7</b>	<b>128.2</b>	<b>122.6</b>	<b>120.7</b>	<b>118.7</b>	<b>119.5</b>

<sup>a</sup> For years 1990 to 2004, the *Inventory* methodology for MSW landfills uses the first order decay methodology. A methodological change occurs in year 2005. For years 2005 to 2023, directly reported net CH<sub>4</sub> emissions from the GHGRP data plus a scale-up factor are used to account for emissions from landfill facilities that are not subject to the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.15. These data incorporate CH<sub>4</sub> recovered and oxidized for MSW landfills. As such, CH<sub>4</sub> generation, CH<sub>4</sub> oxidation, and CH<sub>4</sub> recovery are not calculated separately and totaled to net CH<sub>4</sub> emissions. See the Methodology and Time-Series Consistency section of this chapter for more information.

<sup>b</sup> Methane recovery is not calculated for industrial landfills because this is not a common practice in the United States. Only 3 of 221 landfills that report to Subpart TT (Industrial Waste Landfills) of the GHGRP had an active gas collection and control system during the year 2023 (EPA 2024b).

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

**Table 7-4: CH<sub>4</sub> Emissions from Landfills (kt CH<sub>4</sub>)**

Activity	1990	2005	2019	2020	2021	2022	2023
MSW CH <sub>4</sub> Generation <sup>a</sup>	8,214	10,845	12,153	12,120	11,931	11,759	11,973
Industrial CH <sub>4</sub> Generation	484	638	745	748	750	751	750
MSW CH <sub>4</sub> Recovered <sup>a</sup>	(851)	(5,301)	(7,197)	(7,370)	(7,264)	(7,141)	(7,318)
MSW CH <sub>4</sub> Oxidized <sup>a</sup>	(736)	(843)	(1,048)	(1,045)	(1,032)	(1,055)	(1,063)
Industrial CH <sub>4</sub> Oxidized	(48)	(64)	(74)	(75)	(75)	(75)	(75)
MSW net CH <sub>4</sub> Emissions	6,627	4,701	3,907	3,705	3,635	3,563	3,592
Industrial net CH <sub>4</sub> Emissions <sup>b</sup>	436	574	670	673	675	675	675
<b>Total</b>	<b>7,063</b>	<b>5,275</b>	<b>4,578</b>	<b>4,379</b>	<b>4,310</b>	<b>4,238</b>	<b>4,266</b>

<sup>a</sup> For years 1990 to 2004, the *Inventory* methodology for MSW landfills uses the first order decay methodology. A methodological change occurs in year 2005. For years 2005 to 2023, directly reported net CH<sub>4</sub> emissions from the GHGRP data plus a scale-up factor are used to account for emissions from landfill facilities that are not subject to the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.15. These data incorporate CH<sub>4</sub> recovered and oxidized for MSW landfills. As such, CH<sub>4</sub> generation, CH<sub>4</sub> oxidation, and CH<sub>4</sub> recovery are not calculated separately and totaled to net CH<sub>4</sub> emissions. See the Methodology and Time-Series Consistency section of this chapter for more information.

<sup>b</sup> Methane recovery is not calculated for industrial landfills because this is not a common practice in the United States. Only 3 of 221 landfills that report to Subpart TT (Industrial Waste Landfills) of the GHGRP had an active gas collection and control system during the year 2023 (EPA 2024b).

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

## Methodology and Time-Series Consistency

### Methodology Applied for MSW Landfills

A combination of IPCC Tier 2 and 3 approaches (IPCC 2006) are used over the reported time series to calculate emissions from MSW Landfills, using two primary methods in accordance with IPCC methodological decision trees based on available data. The first method uses the first order decay (FOD) model as described by the *2006 IPCC Guidelines* to estimate CH<sub>4</sub> generation. The amount of CH<sub>4</sub> recovered and combusted from MSW landfills is subtracted from the CH<sub>4</sub> generation and is then adjusted with an oxidation factor. The oxidation factor represents the amount of CH<sub>4</sub> in a landfill that is oxidized to CO<sub>2</sub> as it passes through the landfill cover (e.g., soil, clay, geomembrane). This method is presented below.

### Equation 7-1: Landfill Methane Emissions

$$CH_{4,MSW} = (G_{CH_4} - \sum_{n=1}^N R_n) * (1 - OX)$$

where,

- CH<sub>4,MSW</sub> = Net CH<sub>4</sub> emissions from solid waste
- G<sub>CH<sub>4,MSW</sub></sub> = CH<sub>4</sub> generation from MSW landfills, using emission factors for DOC, k, MCF, F from IPCC (2006) and other peer-reviewed sources
- R = CH<sub>4</sub> recovered and combusted
- OX = CH<sub>4</sub> oxidized from MSW landfills before release to the atmosphere, using Ox values from IPCC (2006) and other peer-reviewed or scientifically validated literature (40 CFR Part 98)

The second method used to calculate CH<sub>4</sub> emissions from landfills, also called the back-calculation method, is based on directly measured amounts of recovered CH<sub>4</sub> from the landfill gas and is expressed below and by Equation HH-8 in 40 CFR Part 98.343. The two parts of the equation consider the portion of CH<sub>4</sub> in the landfill gas that is not collected by the landfill gas collection system, and the portion that is collected. First, the recovered CH<sub>4</sub> is adjusted with the collection efficiency of the gas collection and control system and the fraction of hours the recovery system operated in the calendar year. This quantity represents the amount of CH<sub>4</sub> in the landfill gas that is not captured by the collection system; this amount is then adjusted for oxidation. The second portion of the equation adjusts the portion of CH<sub>4</sub> in the collected landfill gas with the efficiency of the destruction device(s), and the fraction of hours the destruction device(s) operated during the year.

The current *Inventory* uses both methods to estimate CH<sub>4</sub> emissions across the time series within EPA's Waste Model, as summarized in Figure 7-3 below. This chapter provides a summary of the methods, activity data, and parameters used. Additional stepwise explanations to generate the net emissions are provided in Annex 3.15.

### Equation 7-2: Net Methane Emissions from MSW Landfills

$$CH_{4,Solid\ Waste} = \left[ \left( \frac{R}{CE \times f_{REC}} - R \right) \times (1 - OX) + R \times (1 - (DE \times f_{Dest})) \right]$$

where,

- CH<sub>4,Solid Waste</sub> = Net CH<sub>4</sub> emissions from solid waste
- R = Quantity of recovered CH<sub>4</sub> from Equation HH-4 of EPA's GHGRP
- CE = Collection efficiency estimated at the landfill, considering system coverage, operation, and cover system materials from Table HH-3 of EPA's GHGRP. If area by soil cover type information is not available, the default value of 0.75 should be used (percent)
- f<sub>REC</sub> = fraction of hours the recovery system was operating (percent)
- OX = oxidation factor (percent)
- DE = destruction efficiency (percent)
- f<sub>Dest</sub> = fraction of hours the destruction device was operating (fraction)

**Figure 7-3: Methodologies Used Across the Time Series to Compile the Emission Estimates for MSW Landfills**

	1990 - 2004	2005 - 2009	2010 - 2016	2017 - Present
<b>Method</b>	U.S.-specific first-order decay (FOD) model	Back-casted EPA GHGRP reported net methane emissions	EPA GHGRP reported net methane emissions	EPA GHGRP reported net methane emissions
	<b>Annex Steps 1-3</b>	<b>Annex Step 4</b>	<b>Annex Step 5</b>	<b>Annex Step 6</b>
<b>Parameters</b>	IPCC 2006 Emission Factors: <ul style="list-style-type: none"> <li>• DOC = 0.20</li> <li>• MCF = 1</li> <li>• DOC<sub>r</sub> = 0.5</li> <li>• OX = 0.10</li> <li>• DE = 0.99</li> </ul> Activity Data: <ul style="list-style-type: none"> <li>• National waste generation data multiplied by the national disposal factor</li> </ul>	<ul style="list-style-type: none"> <li>• Back-casted GHGRP emissions plus a 9% scale-up factor<sup>1,2</sup></li> <li>• Recovery calculated from four CH<sub>4</sub> recovery databases</li> <li>• Back-calculated CH<sub>4</sub> generation<sup>3</sup></li> <li>• Weighted average oxidation factor based on GHGRP data<sup>3</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Net GHGRP emissions plus a 9% scale-up factor<sup>2</sup></li> <li>• GHGRP CH<sub>4</sub> recovery plus a 9% scale-up factor</li> <li>• Back-calculated CH<sub>4</sub> generation<sup>3</sup></li> <li>• Weighted average oxidation factor based on GHGRP data<sup>3</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Net GHGRP emissions plus an 11% scale-up factor<sup>2</sup></li> <li>• GHGRP CH<sub>4</sub> recovery plus an 11% scale-up factor</li> <li>• Back-calculated CH<sub>4</sub> generation<sup>3</sup></li> <li>• Weighted average oxidation factor based on GHGRP data<sup>3</sup></li> </ul>

<sup>1</sup> The intent of the scale-up factor is to estimate emissions from landfills that do not report to the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.15. The back-casted emissions are calculated using directly reported net methane emissions for GHGRP reporting years 2010 to 2016. The back-casted emissions are subject to change in each *Inventory* based on new reporting year reports and resubmitted greenhouse gas reports for previous years.

This method is compatible with the *2006 IPCC Guidelines* because facilities reporting to the GHGRP either use the FOD method, or directly measured methane recovery data with default emission factors either directly included in the *2006 IPCC Guidelines* or scientifically validated through peer review.

<sup>2</sup> Emission factors used by facilities reporting to GHGRP Subpart HH are facility-specific defaults derived from peer-reviewed literature and the *2006 IPCC Guidelines*.

<sup>3</sup> Methane generation is back-calculated from the net MSW emissions, estimated methane recovery data, and the weighted average oxidation factor based on GHGRP Subpart HH reported data of 0.18 between 2010 to 2016, and 0.22 between 2017 to 2021, and 0.23 in 2022 and 2023.

The Waste Model is a spreadsheet developed by the IPCC for purposes of estimating methane emissions from solid waste disposal sites, adapted to the United States by the inclusion and usage of U.S.-specific parameters. The Waste Model contains activity and waste generation information from both the MSW and Industrial landfill sectors and estimates the amount of CH<sub>4</sub> emissions from each sector for each year of the time series, using both methods. Prior to the 1990 through 2015 *Inventory*, only the FOD method was used. Methodological changes were made to the 1990 through 2015 *Inventory* to incorporate higher tier data (i.e., CH<sub>4</sub> emissions as directly reported to EPA’s GHGRP), which cannot be directly applied to earlier years in the time series without significant bias. The technique used to merge the directly reported GHGRP data with the previous methodology is described as the overlap technique in the Time-Series Consistency chapter of the *2006 IPCC Guidelines*. Additional details on the technique used are included in Annex 3.15, and a technical memorandum (RTI 2017).

Supporting information, including details on the techniques used to ensure time-series consistency by incorporating the directly reported GHGRP emissions is presented in Annex 3.15.

## Methodology Applied for Industrial Waste Landfills

Emissions from industrial waste landfills are estimated using a Tier 2 approach (IPCC 2006) and a tailored (country-specific) IPCC waste model in accordance with IPCC methodological decision trees based on available data. Activity data used are industrial production data (ERG 2023) for two sectors (pulp and paper manufacturing, and food and beverage manufacturing) to which country-specific default waste disposal factors are applied (a separate disposal factor for each sector). The disposal factors, as described below, are based on scientifically reviewed data, and are the same across the entire time series. The emission factors are based on those recommended by the *2006 IPCC Guidelines* and are the same across the entire time series.

The FOD equation from IPCC (2006) is used via the waste model to estimate methane emissions:

### Equation 7-3: Net Methane Emissions from Industrial Waste Landfills

$$CH_{4,IND} = (G_{CH_4} - \sum_{n=1}^N R_n) * (1 - OX)$$

where,

$CH_{4,IND}$	=	Net $CH_4$ emissions from solid waste
$G_{CH_4}$	=	$CH_4$ generation from industrial waste landfills, using production data multiplied by a disposal factor and emission factors for DOC, k, MCF, F (IPCC 2006)
R	=	$CH_4$ recovered and combusted (no recovery is assumed for industrial waste landfills)
OX	=	$CH_4$ oxidized from industrial waste landfills before release to the atmosphere (using the <i>2006 IPCC Guidelines</i> value for OX of 0.10)

The activity data used in the emission calculations are production data (e.g., the amount of meat, poultry, vegetables processed; the amount of paper produced) versus disposal data. There are currently no facility-specific data sources that track and report the amount and type of waste disposed of in the universe of industrial waste landfills in the United States. Based on this limited information, the *Inventory* methodology assumes most of the organic waste placed in industrial waste landfills originates from the food processing (meat, vegetables, fruits) and pulp and paper sectors, thus estimates of industrial landfill emissions focused on these two sectors.

A waste disposal factor is applied to the annual quantities of key food products generated. A waste disposal factor of 4.86 percent is used for 1990 to 2009 and a factor of 6 percent is used for 2010 to the current year. The 4.86 percent disposal factor is based on available data from a 1993 Report to Congress (EPA 1993). The 6 percent waste disposal factor is derived from recent surveys of the food and beverage industry where approximately 94 percent of food waste generated is repurposed (FWRA 2016). The composition of waste disposed of in industrial waste landfills is expected to be more consistent in terms of composition and quantity than that disposed of in MSW landfills. The amount of waste landfilled is assumed to be a fraction of production that is held constant over the time series as explained in Annex 3.15.

Landfill  $CH_4$  recovery is not accounted for in industrial waste landfills and is believed to be minimal based on available data collected under EPA's GHGRP for industrial waste landfills (Subpart TT), which shows that only three of the 221 facilities, or 1 percent of facilities, have active gas collection systems (EPA 2024b). The amount of  $CH_4$  oxidized by the landfill cover at industrial waste landfills is assumed to

be 10 percent of the CH<sub>4</sub> generated (IPCC 2006; Mancinelli and McKay 1985; Czepiel et al. 1996) for all years.

Additionally, the *2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2019) were reviewed to determine if any revisions were required to emission factors, methodologies, and assumptions underlying emission estimates for all source categories. None of the 2019 refinements are applicable to the country-specific methodology applied for the landfills source category.

### Box 7-3: Nationwide Municipal Solid Waste Data Sources

Municipal solid waste (MSW) generated in the United States can be managed through a variety of methods. MSW that is not recycled, composted, combusted with energy recovery, or digested is assumed to be landfilled. In addition to these management pathways, waste or excess food from the food manufacturing and processing sector may be disposed through the sewerage network, used for animal feed, land application, donated for human consumption, and rendered or recycled into biofuels in the case of animal by-products, fats, oils and greases.

There have been three main sources for nationwide solid waste management data in the United States that the *Inventory* has used (see Annex 3.15, Box A-3 for comparison of estimates from these data sources):

- The *BioCycle* and Earth Engineering Center of Columbia University's SOG in America surveys [no longer published];
- The EPA's *Advancing Sustainable Materials Management: Facts and Figures* reports; and
- The EREF's *MSW Generation in the United States* reports.

The SOG surveys and, most recently EREF, collected state-reported data on the amount of waste generated and the amount of waste managed via different management options: landfilling, recycling, composting, and combustion. These data sources used a 'bottom-up' method. The survey asked for actual tonnages instead of percentages in each waste category (e.g., residential, commercial, industrial, construction and demolition, organics, tires) for each waste management option. If such a breakdown was not available, the survey asked for total tons landfilled. The data were adjusted for imports and exports across state lines so that the principles of mass balance were adhered to for completeness, whereby the amount of waste managed did not exceed the amount of waste generated. The SOG and EREF reports present survey data aggregated to the state level.

The EPA *Advancing Sustainable Materials Management: Facts and Figures* report characterizes national post-consumer municipal solid waste (MSW) generation and management using a top-down materials flow (mass balance) methodology. It captures an annual snapshot of MSW generation and management in the United States for specific products. Data are gathered from U.S. Government (e.g., U.S. Census Bureau and U.S. Department of Commerce), state environmental agencies, industry and trade groups, and sampling studies. The materials flow methodology develops MSW waste generation estimates of quantities of MSW products in the marketplace (using product sales and replacement data) and assessing waste generation by component material based on product lifespans. The data are used to estimate tons of materials and products generated, recycled, combusted with energy recovery, managed via other food waste management pathways, or landfilled nationwide. MSW that is not

recycled or composted is assumed to be combusted or landfilled, except for wasted food, which uses a different methodology and includes nine different management pathways. The 2018 Facts and Figures Report (EPA 2020) uses a methodology that expanded the number of management pathways to include: animal feed; bio-based materials and/or biochemical processing (i.e., rendering); co-digestion and/or anaerobic digestion; composting/aerobic processes; combustion; donation; land application; landfill; and sewer or wastewater treatment.

In this *Inventory*, emissions from solid waste management are presented separately by waste disposal option, except for recycling of waste materials.

- **Recycling:** Emissions from recycling are attributed to the stationary combustion of fossil fuels that may be used to power on-site recycling machinery and are presented in the stationary combustion chapter in the Energy sector. The emissions estimates for recycling are not called out separately.
- **Landfill Disposal:** Emissions from solid waste disposal in landfills and the composting of solid waste materials are presented in the Landfills and Composting sections in the Waste sector of this report.
- **Anaerobic Digestion:** Emissions from anaerobic digesters are presented in three different sections depending on the digester category:
  - Emissions from on-farm digesters are included in the Agriculture sector.
  - Emissions from digesters at wastewater treatment plants are included in the Waste sector, and
  - Emissions from stand-alone digesters are also included in the Waste sector.

**Waste Incineration:** Emissions from waste incineration are accounted for in the Incineration chapter of the Energy sector of this report because, in the United States, almost all incineration of MSW occurs at waste-to-energy (WTE) facilities or industrial facilities where useful energy is recovered.

## Uncertainty

Several types of uncertainty are associated with the estimates of CH<sub>4</sub> emissions from MSW and industrial waste landfills when the FOD method is applied directly for 1990 to 2004 in the Waste Model and, to some extent, in the GHGRP methodology. The approach used in the MSW emission estimates assumes that the CH<sub>4</sub> generation potential (L<sub>0</sub>) and the rate of decay that produces CH<sub>4</sub> from MSW, as determined from several studies of CH<sub>4</sub> recovery at MSW landfills, are representative of conditions at U.S. MSW landfills. When this top-down approach is applied at the nationwide level, the uncertainties are assumed to be less than when applying this approach to individual landfills and then aggregating the results to the national level. In other words, the FOD method as applied in this *Inventory* is not facility-specific modeling and while this approach may over- or underestimate CH<sub>4</sub> generation at some landfills if used at the facility-level, the result is expected to balance out because it is being applied nationwide.

There is a high degree of uncertainty associated with the FOD model, particularly when a homogeneous waste composition and hypothetical decomposition rates are applied to heterogeneous landfills (IPCC 2006). There is less uncertainty in EPA's GHGRP data because this methodology is facility-specific, uses directly measured CH<sub>4</sub> recovery data (when applicable), and allows for a variety of landfill gas collection efficiencies, destruction efficiencies, and/or oxidation factors to be used.

Uncertainty also exists in the scale-up factors (both 9 percent and 11 percent) applied for years 2005 to 2016 and 2017 to 2023, respectively, and in the back-casted emissions estimates for 2005 to 2009. As detailed in RTI (2018), limited information is available for landfills that do not report to the GHGRP. RTI developed an initial list of landfills that do not report to the GHGRP with the intent of quantifying the total waste-in-place for these landfills that would add up to the scale-up factor. Input was provided by industry, LMOP, and additional EPA support. However, many gaps existed in the initial development of this Non-Reporting Landfills Database. Assumptions were made for hundreds of landfills to estimate their waste-in-place and the subsequent scale-up factors. The waste-in-place estimated for each landfill is likely not 100 percent accurate and should be considered a reasonable estimate. Additionally, a simple methodology was used to back-cast emissions for 2005 to 2009 using the GHGRP-reported emissions from 2010 to 2023. This methodology does not factor in annual landfill to landfill changes in landfill CH<sub>4</sub> generation and recovery. Because of this, an uncertainty factor of 25 percent is applied to the scale-up factor and years (emission estimates) the scale-up factor is applied to.

Aside from the uncertainty in estimating landfill CH<sub>4</sub> generation, uncertainty also exists in the estimates of the landfill gas oxidized at MSW landfills. Facilities directly reporting to EPA's GHGRP can use oxidation factors ranging from 0 to 35 percent, depending on their facility-specific CH<sub>4</sub> flux. As recommended by the *2006 IPCC Guidelines* for managed landfills, a 10 percent default oxidation factor is applied in the *Inventory* for both MSW landfills (those not reporting to the GHGRP and for the years 1990 to 2004 when GHGRP data are not available) and industrial waste landfills regardless of climate, the type of cover material, and/or presence of a gas collection system.

Another significant source of uncertainty lies with the estimates of CH<sub>4</sub> recovered by flaring and gas-to-energy projects at MSW landfills that are sourced from the *Inventory's* CH<sub>4</sub> recovery databases (used for years 1990 to 2004). Four CH<sub>4</sub> recovery databases are used to estimate nationwide CH<sub>4</sub> recovery for MSW landfills for 1990 to 2009. The GHGRP MSW landfills database was added as a fourth recovery database starting with the 1990 to 2013 *Inventory* report (two years before the full GHGRP data set started being used for net CH<sub>4</sub> emissions for the *Inventory*). Relying on multiple databases for a complete picture introduces uncertainty because the coverage and characteristics of each database differs, which increases the chance of double counting avoided emissions. The methodology and assumptions that go into each database differ. For example, the flare database assumes the midpoint of each flare capacity at the time it is sold and installed at a landfill; the flare may be achieving a higher capacity, in which case the flare database would underestimate the amount of CH<sub>4</sub> recovered. Additionally, two databases, the EIA database and flare vendor database, could no longer be updated for the entire time series due to external factors. For example, the EIA database has not been updated since 2006 because the EIA stopped collecting landfill recovery data. The EIA database has, for the most part, been replaced by the GHGRP MSW landfills database. The flare database was populated annually until 2015, but decreasing, voluntary participation from flare vendors sharing their flare sales data for several years prior to 2015.

To avoid double counting and to use the most relevant estimate of CH<sub>4</sub> recovery for a given landfill, a hierarchical approach is used among the four databases. GHGRP data and the EIA data are given precedence because facility data were directly reported; the LFGE data are given second priority because CH<sub>4</sub> recovery is estimated from facility-reported LFGE system characteristics; and the flare data are given the lowest priority because this database contains minimal information about the flare, no site-specific operating characteristics, and includes smaller landfills not included in the other three databases (Bronstein et al. 2012). The coverage provided across the databases most likely represents

the complete universe of landfill CH<sub>4</sub> gas recovery; however, the number of unique landfills between the four databases does differ.

The *2006 IPCC Guidelines* default value of 10 percent for uncertainty in recovery estimates was used for two of the four recovery databases in the uncertainty analysis where metering of landfill gas was in place (for about 64 percent of the CH<sub>4</sub> estimated to be recovered). This 10 percent uncertainty factor applies to the LFGE database; 12 percent to the EIA database; and 1 percent for the GHGRP MSW landfills dataset because of the supporting information provided and rigorous verification process. For flaring without metered recovery data (the flare database), a much higher uncertainty value of 50 percent is used. The compounding uncertainties associated with the four databases in addition to the uncertainties associated with the FOD method and annual waste disposal quantities leads to the large upper and lower bounds for MSW landfills presented in Table 7-5.

The lack of landfill-specific information regarding the number and type of industrial waste landfills in the United States is a primary source of uncertainty with respect to the industrial waste generation and emission estimates. The approach used here assumes that most of the organic waste disposed of in industrial waste landfills that would result in CH<sub>4</sub> emissions consists of waste from the pulp and paper and food processing sectors. However, because waste generation and disposal data are not available in an existing data source for all U.S. industrial waste landfills, a straight disposal factor is applied over the entire time series to the amount produced to determine the amounts disposed. Industrial waste facilities reporting under EPA's GHGRP do report detailed waste stream information, and these data have been used to improve, for example, the DOC value used in the *Inventory* methodology for the pulp and paper sector. A 10 percent oxidation factor is also applied to CH<sub>4</sub> generation estimates for industrial waste landfills and carries the same amount of uncertainty as with the factor applied to CH<sub>4</sub> generation for MSW landfills. The specified probability density functions (PDFs) are assumed to be normal for most activity data and emission factors, and due to lack of data, are based on expert judgement (RTI 2004).

The results of the *2006 IPCC Guidelines* Approach 2 quantitative uncertainty analysis are summarized in Table 7-5. There is considerable uncertainty for the MSW landfills estimates due to the many data sources used, each with its own uncertainty factor.

**Table 7-5: Approach 2 Quantitative Uncertainty Estimates for CH<sub>4</sub> Emissions from Landfills (MMT CO<sub>2</sub> Eq. and Percent)**

Source	Gas	2023 Emission Estimate (MMT CO <sub>2</sub> Eq.)	Uncertainty Range Relative to Emission Estimate <sup>a</sup>			
			(MMT CO <sub>2</sub> Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
<b>Total Landfills</b>	<b>CH<sub>4</sub></b>	<b>119.5</b>	<b>108.9</b>	<b>136.1</b>	<b>-9%</b>	<b>+14%</b>
MSW	CH <sub>4</sub>	100.6	98.7	120.5	-2%	+20%
Industrial	CH <sub>4</sub>	18.9	16.1	26.2	-15%	+39%

<sup>a</sup> Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval. Individual uncertainty factors are applied to activity data and emission factors in the Monte Carlo analysis.

## QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1, Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). QA/QC checks are performed for the transcription of the published data set

(e.g., EPA's GHGRP dataset) used to populate the *Inventory* data set in terms of completeness and accuracy against the reference source. Additionally, all datasets used for this category have been checked to ensure they are of appropriate quality and are representative of U.S. conditions. The primary calculation spreadsheet is tailored from the 2006 IPCC Guidelines waste model and has been verified previously using the original, peer-reviewed IPCC waste model. All model input values and calculations were verified by secondary QA/QC review. Stakeholder engagements sessions in 2016 and 2017 were used to gather input on methodological improvements and facilitate an external expert review on the methodology, activity data, and emission factors.

Category-specific checks include the following:

- Evaluation of the secondary data sources used as inputs to the *Inventory* dataset to ensure they are appropriately collected and are reliable;
- Cross-checking the data (activity data and emissions estimates) with previous years to ensure the data are reasonable, and that any significant variation can be explained;
- Conducting literature reviews to evaluate the appropriateness of country-specific emission factors (e.g., DOC values, precipitation zones with respect to the application of the k values) given findings from recent peer-reviewed studies; and
- Reviewing secondary datasets to ensure they are nationally complete and supplementing where necessary (e.g., using a scale-up factor to account for emissions from landfills that do not report to EPA's GHGRP).

A primary focus of the QA/QC checks in past Inventories was to ensure that CH<sub>4</sub> recovery estimates were not double-counted and that all LFGE projects and flares were included in the respective project databases. QA/QC checks performed in the past for the recovery databases were not performed in this *Inventory*, because new data were not added to the recovery databases in this *Inventory* year.

For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., combination of electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent.<sup>2</sup> Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with several general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. For the MSW Landfills sector, under Subpart HH of the GHGRP, MSW Landfills with gas collection are required to report emissions from their site using both a forward- (using a first order decay model as a basis) and back-calculating (using parameters specific to the landfill itself, such as measured recovery and collection efficiency of the landfill gas) methodology. Details on the forward- and back-calculation approach can be found in Annex 3.15 and 40 CFR Subpart HH of Part 98. Reporters can choose which of these two methodologies they believe best represents the emissions at their landfill and are required to submit that value as their total Subpart HH emissions. Facilities are generally not expected to switch between the two equations each year, as the emissions calculated using each method can vary greatly and can have a significant effect on emission trends for that landfill, and potentially the entire MSW Landfill sector under the GHGRP. Key checks are in place to assure that emissions are trending in a sensible way year over year for each reporting landfill.

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<sup>2</sup> See [https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp\\_verification\\_factsheet.pdf](https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf).

## Recalculations Discussion

Revisions to the individual facility reports submitted to EPA's GHGRP can be made at any time and a portion of facilities have revised their reports since 2010 for various reasons, resulting in changes to the total net CH<sub>4</sub> emissions for MSW landfills. Each *Inventory* year, the back-casted emissions for 2005 to 2009 will be recalculated using the most recently verified data from the GHGRP. Changes in these data result in changes to the back-casted emissions. The impact of the revisions to the GHGRP Subpart HH annual greenhouse gas reports resubmitted for 2020 to 2022 slightly increased total Subpart HH reported net emissions and Subpart HH total recovery by an average of 0.9 percent and 0.5 percent respectively, which decreased net MSW emissions by an average of 1.2 percent. A change in net Subpart HH reported emissions results in the same percentage change in the *Inventory* emissions for that year.

Slight revisions were also made to the food and beverage sector production data for nearly every year of the time series. The production data increased by 1 to 3 MMT per year between 1990 and 2017 and decreased by a few MMT per year between 2018 and 2023. These revisions very slightly increased net emissions from industrial waste landfills by less than 0.003 percent between 1990 and 2010. Emissions decreased slightly between 2011 and 2021 (ranging from 0.005 percent in 2011 to a percent in 2021) and increased by 0.01 percent in 2022.

The combined changes to the MSW and industrial waste landfills activity data resulted in annual increases ranging from 0.001 percent in 2011 to 0.004 percent to net emissions between 2011 and 2016. Emissions increased between 0.5 percent in 2017 to 0.9 percent in 2022.

The U.S. Census Bureau data indicates population changes in the United States from 2022 to 2023 for reporting years 2020 through 2022. In 2020 and 2021, the U.S. population grew slightly by approximately 0.008 percent and 0.047 percent, respectively, but declined by around 0.005 percent in 2022. For Puerto Rico, population changes also occurred during the same period, with a 4 percent increase in 2020, followed by decreases of 0.027 percent in 2021 and 0.052 percent in 2022. These shifts impacted the solid waste generated in U.S. tons and waste territories by similar percentages, likely contributing to the observed decrease in net emissions from 2020 through 2022 in the previous (1990 through 2022) *Inventory* estimates compared to the current (1990 through 2023) *Inventory* estimates.

Over the time series, the total emissions on average decreased by 0.1 percent (0.2 MMT CO<sub>2</sub> eq.) from the previous *Inventory*.

## Planned Improvements

The EPA received recommendations from industry stakeholders to revise the DOC and decay rate (k) values used in Subpart HH of the GHGRP to better reflect recent trends in waste composition at MSW landfills. In response, the EPA developed a multivariate analysis using publicly available GHGRP data to optimize DOC and k values for over 1,100 reporting landfills. The analysis informed a rulemaking revision to 40 CFR Part 98 that was finalized in April 2024. This includes key revisions to the default DOC and k values in Subpart HH, which will take effect on January 1, 2025.

The revisions, detailed in the final rule, include updated DOC values and k rates to enhance the accuracy of methane generation modeling from landfills. DOC values are revised for different waste characterization options, including adjustments from 0.20 to 0.17 for bulk waste and 0.31 to 0.27 for bulk MSW without inerts. The k values are also updated based on average optimal values, with new ranges for uncharacterized MSW. These changes are expected to impact future national and state MSW

inventories starting with the 2025 reporting year, with data published in 2026. The revised factors will be applied retroactively for disposal years 2010 and later to better account for changes in waste composition, improving the accuracy of landfill methane emissions estimates in the U.S. national and state inventories.

In recent years, a few studies have measured emissions at a large number of landfills (200+) from plane-based and satellite-based sensors. These studies (Cusworth 2024 and Nesser 2024) indicate underestimating of MSW landfill emissions at the facility level and national level. There are a variety of potential uses of data from new studies, including replacing a previous estimate or factor, verifying or QA of an existing estimate or factor, and identifying areas for updates. For the present, this indicates a need to assess emission factors, equations, and methodologies used to calculate emissions from MSW landfills, in particular the emission factors and equations used in GHGRP Subpart HH. As discussed above, revisions were finalized in a 2024 rulemaking to improve the data collected. These changes to emission factors and equations will be examined in the next year to see what potential impact the changes will have on national emission estimates produced in the *Inventory*. Additionally, these estimates will be compared to the recent methane measurement studies as a QA check for the emission factors, equations, and methodologies used in the *Inventory*.

With respect to the scale-up factor, EPA received comments on revisions made to the scale-up for the 1990 to 2020 *Inventory* from a total waste-in-place approach to a time-based threshold of 50 years. Commenters noted that this time-based threshold approach does not adjust for the non-linearity of methane production of landfill gas. In response, EPA will further investigate how best to account for emissions from MSW landfills that do not report to the GHGRP, including using the FOD model for these landfills based on estimated annual waste disposed for this subset of landfills between 2005 to 2023, reverting to the total waste-in-place approach, or modifying the time-based threshold approach.

Relatedly, EPA will periodically assess the impact to the waste-in-place and emissions data from GHGRP facilities that have resubmitted annual reports during any reporting years, are new reporting facilities, and from facilities that have stopped reporting to the GHGRP to ensure national estimates are as complete as possible. Facilities may stop reporting to the GHGRP when they meet the “off-ramp” provisions (reported less than 15,000 metric tons of CO<sub>2</sub> equivalent emissions for 3 consecutive years or less than 25,000 metric tons of CO<sub>2</sub> equivalent emissions for 5 consecutive years). If warranted, EPA will revise the scale-up factor to reflect newly acquired information to ensure completeness of the *Inventory*. EPA considered public comments received on the 1990 through 2019 *Inventory* specific to using a time-based threshold to calculate the scale-up factor instead of a total waste-in-place approach. The rationale supporting the comments was that older, closed landfills with large quantities of waste-in-place are driving up the scale-up factor but have little impact on total methane generation. EPA assessed two time-based scenarios for developing the scale-up factor – one scenario looking at the past 30 years of waste disposed, and the second looking at the past 50 years of waste disposed. The 50-year time-based threshold was applied and resulted in the 11 percent scale-up factor used between 2017 and 2023.

EPA is planning to account for unmanaged landfills in Puerto Rico and other U.S. Territories to the landfill emissions estimates. Data limitations for historical waste received at these sites make this challenging. Presently, emissions from managed sites in Puerto Rico and Guam are accounted for in 2005 to present as part of the GHGRP Subpart HH dataset.

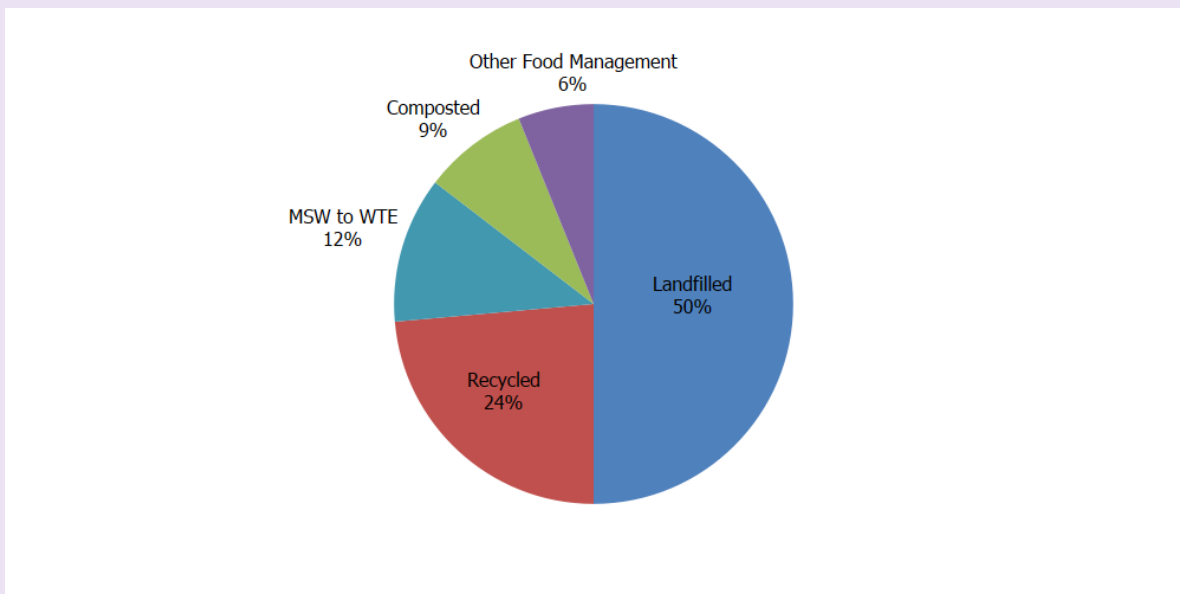
### Box 7-4: Overview of U.S. Solid Waste Management Trends

As shown in Figure 7-4 and Figure 7-5 landfilling of MSW is currently and has been the most common waste management practice. A large portion of materials in the waste stream are recovered for recycling and composting, which is becoming an increasingly prevalent trend throughout the country. Materials that are composted and recycled would have previously been disposed in a landfill.

Table 7-6 presents the national-level material composition of waste disposed across typical MSW landfills in the United States over time. It is important to note that the actual composition of waste entering each landfill will vary from that presented in Table 7-6.

Understanding how the waste composition changes over time, specifically for the degradable waste types (i.e., those types known to generate CH<sub>4</sub> as they break down in a modern MSW landfill), is important for estimating greenhouse gas emissions. Increased diversion of degradable materials so that they are not disposed of in landfills reduces the CH<sub>4</sub> generation potential and CH<sub>4</sub> emissions from landfills. For certain degradable waste types (i.e., paper and paperboard), the amounts discarded have decreased over time due to an increase in waste diversion through recycling and composting (see Table 7-6 and Figure 7-6). As shown in Figure 7-6, the diversion of food scraps has been consistently low since 1990 because most cities and counties do not practice curbside collection of these materials, although the quantity has been slowly increasing in recent years. Neither Table 7-6 nor Figure 7-6 reflect the frequency of backyard composting of yard trimmings and food waste because this information is largely not collected nationwide and is hard to estimate.

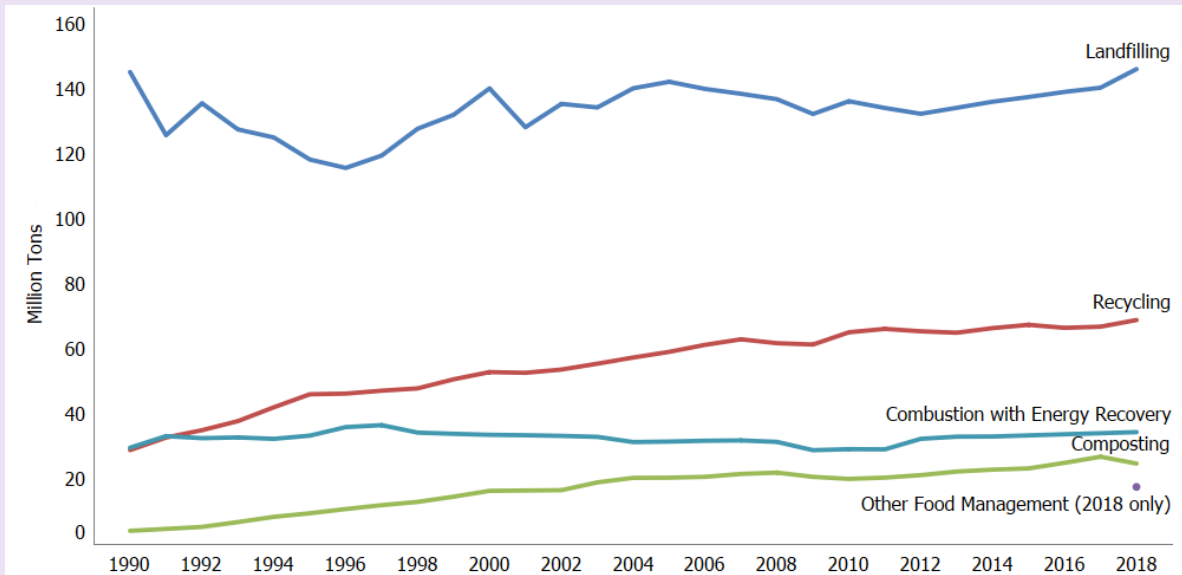
**Figure 7-4: Management of Municipal Solid Waste in the United States, 2018**



Notes: 2018 is the latest year of available data. Data taken from Table 35 of EPA (2020a). MSW to WTE is combustion with energy recovery (WTE = waste-to-energy).

Source: EPA (2020b)

**Figure 7-5: MSW Management Trends from 1990 to 2018**



Notes: 2018 is the latest year of available data. Only one year of data (2018) is available for the “Other Food Management” category.

Source: EPA (2020b). The EPA Advancing Sustainable Materials Management reports only present data for select years, thus several reports were used in the compilation of this figure. All data were taken from Table 35 in EPA 2020b for 1990, 2000, 2015, 2017 and 2018. Data were taken from Table 35 in EPA (2019) for 2010 and 2016. Data were taken from EPA (2018) for 2014. Data were taken from Table 35 of EPA (2016b) for 2012 and 2013. Data were taken from Table 30 of EPA (2014) for 2008 and 2011. The reports with data available for years prior to EPA (2012) can be provided upon request but are no longer on the EPA’s Advancing Sustainable Materials Management web site.<sup>3</sup>

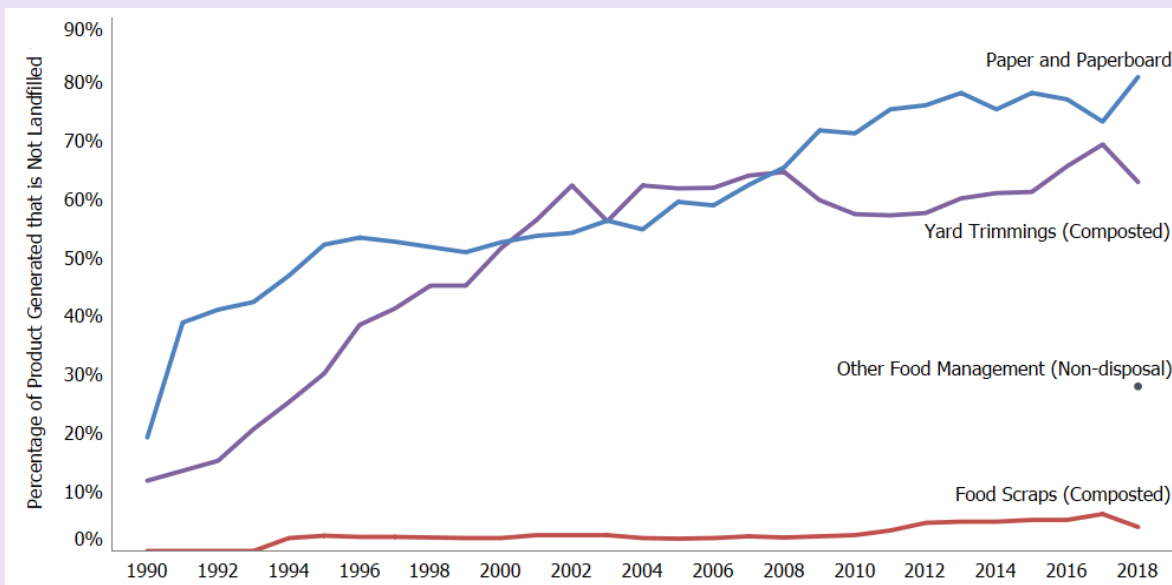
**Table 7-6: Materials Discarded in the Municipal Waste Stream by Waste Type from 1990 to 2018 (Percent)**

Waste Type	1990	2005	2015	2016	2017	2018
Paper and Paperboard	30.0%	24.7%	13.3%	12.7%	13.1%	11.8%
Glass	6.0%	5.8%	5.0%	4.9%	4.9%	5.2%
Metals	7.2%	7.9%	9.5%	9.8%	9.9%	9.5%
Plastics	9.5%	16.4%	18.9%	18.9%	19.2%	18.5%
Rubber and Leather	3.2%	2.9%	3.3%	3.4%	3.5%	3.4%
Textiles	2.9%	5.3%	7.7%	8.0%	8.0%	7.7%
Wood	6.9%	7.5%	8.0%	8.8%	8.7%	8.3%
Other	1.4%	1.8%	2.2%	2.2%	2.2%	2.0%
Food Scraps	13.6%	18.5%	22.0%	22.1%	22.0%	24.1%
Yard Trimmings	17.6%	7.0%	7.8%	6.9%	6.2%	7.2%
<b>Miscellaneous Inorganic Wastes</b>	<b>1.7%</b>	<b>2.2%</b>	<b>2.3%</b>	<b>2.3%</b>	<b>2.3%</b>	<b>2.3%</b>

Source: EPA (2020b)

<sup>3</sup> See <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/advancing-sustainable-materials-management>.

**Figure 7-6: Percent of Degradable Materials Diverted from Landfills from 1990 to 2018 (Percent)**



Note: The data shown in this chart are for recycling of paper and paperboard, composting of food scraps and yard trimmings, and alternative management pathways for the Other Food Management (non-disposal) category. The Other Food Management (non-disposal) category is a new addition and only one year of data are available for 2018 (28 percent of the food waste generated was beneficially reused or managed using a method that was not landfilling, recycling, or composting). The Other Food Management pathways include animal feed, bio-based materials/biochemical processing, co-digestion/anaerobic digestion, donation, land application, and sewer/wastewater treatment.

Source: EPA (2020b). The EPA Advancing Sustainable Materials reports only present data for select years, thus several reports were used in the compilation of this figure. All data were taken from Table 35 in EPA (2020b) for 1990, 2000, 2015, 2017 and 2018. Data were taken from Table 35 in EPA (2019) for 2010 and 2016. Data were taken from EPA (2018) for 2014. Data were taken from Table 35 of EPA (2016b) for 2012 and 2013. Data were taken from Table 30 of EPA (2014) for 2008 and 2011. The reports with data available for years prior to EPA (2012) can be provided upon request, but are no longer on the EPA's Advancing Sustainable Materials Management website.<sup>4</sup>

## 7.2 Wastewater Treatment and Discharge (Source Category 5D)

Wastewater treatment and discharge processes are sources of anthropogenic methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) emissions. Wastewater from domestic and industrial sources is treated to remove soluble organic matter, suspended solids, nutrients, pathogens, and chemical contaminants.<sup>5</sup> In the United States, approximately 19 percent of domestic wastewater is treated in septic systems or other on-site systems, while the rest is collected and treated centrally (U.S. Census Bureau 2023a). Treatment of industrial wastewater may occur at the industrial plant using package or specially designed treatment plants or be collected and transferred off site for co-treatment with domestic wastewater in centralized

<sup>4</sup> See <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/advancing-sustainable-materials-management>.

<sup>5</sup> Throughout the *Inventory*, emissions from domestic wastewater also include any commercial and industrial wastewater collected and co-treated with domestic wastewater.

treatment systems. Therefore, in the United States, domestic wastewater entering a centralized wastewater treatment system can consist of municipal, commercial and institutional, as well as a portion of industrial wastewater.

**Centralized Treatment.** Centralized wastewater treatment systems use sewer systems to collect and transport wastewater to the treatment plant. Sewer collection systems provide an environment conducive to the formation of CH<sub>4</sub>, which can be substantial depending on the configuration and operation of the collection system (Guisasola et al. 2008). Recent research has shown that at least a portion of CH<sub>4</sub> formed within the collection system enters the centralized system where it contributes to CH<sub>4</sub> emissions from the treatment system (Foley et al. 2015).

Centralized treatment can include a variety of processes, including physical separation of material that readily settles out (primary treatment), biological processes to convert and remove contaminants (secondary treatment), and advanced treatment to remove targeted pollutants, such as nutrients (tertiary treatment). Not all wastewater treatment plants conduct primary treatment prior to secondary treatment, and not all plants conduct advanced or tertiary treatment (EPA 2010).

Secondary treatment generally removes soluble organic matter. Microorganisms can biodegrade soluble organic material in wastewater under aerobic or anaerobic conditions, where the latter condition produces CH<sub>4</sub>. The resulting biomass (sludge) is removed from the wastewater (effluent) prior to discharge to the receiving stream and may be further biodegraded under aerobic or anaerobic conditions, such as anaerobic sludge digestion. Sludge can be produced from both primary and secondary treatment operations. In some cases, facilities further process this sludge onsite via anaerobic sludge digesters. These digesters still emit CH<sub>4</sub>, due to unintentional leakages, but at a greatly reduced rate than anaerobic treatment without recovery (either CH<sub>4</sub> capture or flaring). The resulting biogas and digestate may be beneficially reused. Constructed wetlands are coupled anaerobic-aerobic systems more commonly used as a final treatment step following settling and biological treatment (i.e., tertiary treatment after primary and secondary treatment) and in limited cases used as the sole method of wastewater treatment (<0.1 percent of centrally treated wastewater (ERG 2016). Constructed wetlands develop natural processes that involve vegetation, soil, and associated microbial assemblages to treat incoming contaminants (IPCC 2014). Constructed wetlands do not produce secondary sludge (sewage sludge). Emissions from flooded lands or constructed waterbodies (not used for wastewater treatment) and lands converted to flooded lands (not used for wastewater treatment) are estimated and reported in Chapter 6, under Sections 6.8 Wetlands Remaining Wetlands and 6.9 Lands Converted to Wetlands.

Nitrous oxide is generated as a by-product of nitrification, or as an intermediate product of denitrification of the nitrogen (N) present, usually in the form of urea, proteins, and ammonia in wastewater. Ammonia N is converted to nitrate (NO<sub>3</sub>) through the aerobic process of nitrification. Denitrification occurs under anoxic/anaerobic conditions, whereby anaerobic or facultative organisms reduce oxidized forms of nitrogen (e.g., nitrite, nitrate) in the absence of free oxygen to produce nitrogen gas (N<sub>2</sub>). No matter where N<sub>2</sub>O is formed it is typically stripped (i.e., transferred from the liquid stream to the air and ultimately emitted into the atmosphere) in aerated parts of the treatment process. Stripping also occurs in non-aerated zones at rates lower than in aerated zones. More recent research has revealed that emissions from nitrification or nitrification-denitrification processes at wastewater treatment, previously judged to be a minor source, may in fact result in more substantial emissions (IPCC 2019).

**On-site Treatment.** Most on-site systems in the United States are septic systems composed of a septic tank, generally buried in the ground, and a soil dispersion system. Solids and dense materials contained in the incoming wastewater (influent) settle in the septic tank as sludge. Floatable material (scum) is also retained in the tank. The sludge that settles on the bottom of the tank undergoes anaerobic digestion. Partially treated water is discharged in the soil dispersal system. The solid fraction accumulates and remains in the tank for several years, during which time it degrades anaerobically. The gas produced from anaerobic sludge digestion (mainly CH<sub>4</sub> and biogenic CO<sub>2</sub>) rises to the liquid surface and is typically released through vents. The gas produced in the effluent dispersal system (mainly N<sub>2</sub>O and biogenic CO<sub>2</sub>) is released through the soil.

**Discharge.** Dissolved CH<sub>4</sub> and N<sub>2</sub>O present in wastewater discharge to aquatic environments has the potential to be released into the atmosphere (Short et al. 2014; Short et al. 2017). In addition, the presence of organic matter or nitrogen in wastewater discharges is generally expected to increase CH<sub>4</sub> and N<sub>2</sub>O emissions from these aquatic environments. Where organic matter is released to slow-moving aquatic systems, such as lakes, estuaries, and reservoirs, CH<sub>4</sub> emissions are expected to be higher. Similarly, in the case of discharge to nutrient-impacted or hypoxic waters, N<sub>2</sub>O emissions can be significantly higher (IPCC 2019).

In summary, the principal factor in determining the CH<sub>4</sub> generation potential of wastewater is the amount of degradable organic material in the wastewater. Common parameters used to measure the organic component of the wastewater are the biochemical oxygen demand (BOD) and chemical oxygen demand (COD). Under the same conditions, wastewater with higher COD (or BOD) concentrations will generally yield more CH<sub>4</sub> than wastewater with lower COD (or BOD) concentrations. BOD represents the amount of oxygen that would be required to completely consume the organic matter contained in the wastewater through aerobic decomposition processes, while COD measures the total material available for chemical oxidation (both biodegradable and non-biodegradable). The BOD value is commonly expressed in milligrams of oxygen consumed per liter of sample during 5 days of incubation at 20°C, or BOD<sub>5</sub>. Throughout the rest of this chapter, the term “BOD” refers to BOD<sub>5</sub>. IPCC (2006) indicates that because BOD is an aerobic parameter, it may be preferable to use COD to estimate CH<sub>4</sub> production which occurs in anaerobic conditions; however, the IPCC authors recognized that in most countries, operations predominately measure BOD for domestic wastewater and COD for industrial wastewater, so likelihood of available data were considered for the methodological development. Where present, biogas recovery and flaring operations reduce the amount of CH<sub>4</sub> generated that is actually emitted. Per IPCC guidelines (IPCC 2019), emissions from anaerobic sludge digestion, including biogas recovery and flaring operations, where the digester’s primary use is for treatment of wastewater treatment solids, are estimated and reported under wastewater treatment. The principal factor in determining the N<sub>2</sub>O generation potential of wastewater is the amount of N in the wastewater. The variability of N in the influent to the treatment system, as well as the operating conditions of the treatment system itself, also impact the N<sub>2</sub>O generation potential. The methods and underlying data sources to estimate emissions from are described in further detail in the “Methodology and Time-Series Consistency” section below for treatment of domestic and industrial wastewater.

Total methane (CH<sub>4</sub>) emissions from wastewater treatment and discharge were 21.1 MMT CO<sub>2</sub> Eq. (755 kt CH<sub>4</sub>) in 2023, including 14.0 MMT CO<sub>2</sub> Eq. (500 kt CH<sub>4</sub>) from domestic wastewater treatment and discharge and 7.1 MMT CO<sub>2</sub> Eq. (255 kt CH<sub>4</sub>) from industrial wastewater treatment and discharge (Table 7-7, Table 7-8). Methane emissions from domestic wastewater remained fairly steady from 1990 through 2002 but have decreased since that time due to decreasing use of anaerobic systems, including

reduced use of on-site septic systems and central anaerobic treatment systems (EPA 1992, 1996, 2000, and 2004; U.S. Census Bureau 2023a). Methane emissions from industrial wastewater emissions have generally increased across the time series through 1999 and then fluctuated up and correspond with production changes from the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and brewery industries. Industrial wastewater emissions have generally seen an uptick since 2016.

Nitrous oxide (N<sub>2</sub>O) emissions from wastewater treatment and discharge in 2023 totaled 20.8 MMT CO<sub>2</sub> Eq. (79 kt N<sub>2</sub>O), including 20.3 MMT CO<sub>2</sub> Eq. (77 kt N<sub>2</sub>O) from domestic wastewater and 0.5 MMT CO<sub>2</sub> Eq. (1.7 kt N<sub>2</sub>O) from industrial wastewater (Table 7-7, Table 7-8). N<sub>2</sub>O emissions from domestic wastewater have gradually increased across the time series because of an increasing U.S. population and protein consumption. Industrial emission sources have gradually increased across the time series with production changes associated with the treatment of wastewater, namely from meat and poultry processing and petroleum refining, but also with contributions from pulp and paper manufacturing and brewery industries. Overall, treatment of wastewater emitted 41.9 MMT CO<sub>2</sub> Eq. in 2023.

**Table 7-7: CH<sub>4</sub> and N<sub>2</sub>O Emissions from Domestic and Industrial Wastewater Treatment (MMT CO<sub>2</sub> Eq.)**

Activity	1990	2005	2019	2020	2021	2022	2023
<b>CH<sub>4</sub></b>	<b>22.7</b>	<b>22.7</b>	<b>21.1</b>	<b>21.0</b>	<b>20.7</b>	<b>20.9</b>	<b>21.1</b>
Domestic Treatment	15.1	14.6	11.9	11.7	11.4	11.7	12.0
Domestic Effluent	1.4	1.4	2.0	2.1	2.1	2.0	2.0
Industrial Treatment <sup>a</sup>	5.5	6.1	6.6	6.6	6.7	6.7	6.6
Industrial Effluent <sup>a</sup>	0.7	0.6	0.5	0.5	0.5	0.5	0.5
<b>N<sub>2</sub>O</b>	<b>14.8</b>	<b>18.1</b>	<b>21.1</b>	<b>21.8</b>	<b>21.3</b>	<b>21.1</b>	<b>20.8</b>
Domestic Treatment	10.5	13.7	16.2	16.8	16.5	16.4	16.3
Domestic Effluent	3.9	3.9	4.4	4.5	4.3	4.2	4.1
Industrial Treatment <sup>b</sup>	0.3	0.4	0.4	0.4	0.4	0.4	0.4
Industrial Effluent <sup>b</sup>	0.1	0.1	0.1	0.1	0.1	0.1	0.1
<b>Total</b>	<b>37.5</b>	<b>40.7</b>	<b>42.3</b>	<b>42.7</b>	<b>41.9</b>	<b>42.0</b>	<b>41.9</b>

<sup>a</sup> Industrial activity for CH<sub>4</sub> includes the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and breweries industries.

<sup>b</sup> Industrial activity for N<sub>2</sub>O includes the pulp and paper manufacturing, meat and poultry processing, starch-based ethanol production, and petroleum refining.

Note: Totals by gas may not sum due to independent rounding.

**Table 7-8: CH<sub>4</sub> and N<sub>2</sub>O Emissions from Domestic and Industrial Wastewater Treatment (kt)**

Activity	1990	2005	2019	2020	2021	2022	2023
<b>CH<sub>4</sub></b>	<b>811</b>	<b>809</b>	<b>755</b>	<b>748</b>	<b>738</b>	<b>747</b>	<b>755</b>
Domestic Treatment	539	<b>521</b>	426	419	407	418	430
Domestic Effluent	49	<b>49</b>	73	74	74	72	70
Industrial Treatment <sup>a</sup>	196	<b>216</b>	236	236	238	238	236
Industrial Effluent <sup>a</sup>	27	<b>22</b>	19	19	19	19	19
<b>N<sub>2</sub>O</b>	<b>56</b>	<b>68</b>	<b>80</b>	<b>82</b>	<b>80</b>	<b>80</b>	<b>79</b>
Domestic Treatment	40	<b>52</b>	61	63	62	62	61

Activity	1990	2005	2019	2020	2021	2022	2023
Domestic Effluent	15	15	17	17	16	16	15
Industrial Treatment <sup>b</sup>	1	1	2	1	1	1	1
Industrial Effluent <sup>b</sup>	+	+	+	+	+	+	+

+ Does not exceed 0.5 kt.

<sup>a</sup> Industrial activity for CH<sub>4</sub> includes the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and breweries industries.

<sup>b</sup> Industrial activity for N<sub>2</sub>O includes the pulp and paper manufacturing, meat and poultry processing, starch-based ethanol production, and petroleum refining.

Note: Totals by gas may not sum due to independent rounding.

## Methodology and Time-Series Consistency

The methodologies presented in IPCC (2019) form the basis of the CH<sub>4</sub> and N<sub>2</sub>O emission estimates for both domestic and industrial wastewater treatment and discharge.<sup>6</sup> Domestic wastewater treatment follows the IPCC Tier 2 methodology for significant pathways, and IPCC Tier 1 methodologies for some pathways in accordance with IPCC methodological decision trees based on available data (i.e., centralized treatment (CH<sub>4</sub>), centralized (anaerobic) treatment (N<sub>2</sub>O), and septic systems (N<sub>2</sub>O)). Domestic wastewater discharge follows IPCC Tier 2 discharge methodology and emission factors in accordance with IPCC methodological decision trees based on available data. Default factors from IPCC (2019) or IPCC (2006) are used when there are insufficient U.S.-specific data to develop a U.S.-specific factor, though IPCC default factors are often based in part on data from or representative of U.S. wastewater treatment systems. Industrial wastewater treatment follows IPCC Tier 1 and industrial wastewater treatment discharge follows Tier 1 or Tier 2 methodologies, again in accordance with methodological decision trees and available data. Similar to domestic wastewater, IPCC default factors are used when there are insufficient U.S.-specific data to develop a U.S.-specific factor. EPA will continue to investigate opportunities to implement the Tier 2 discharge methodology for more industries as data and resource constraints allow (see the Planned Improvements section below). This section presents a summary of the methodologies used to estimate CH<sub>4</sub> and N<sub>2</sub>O emissions from wastewater treatment and discharge.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2023. See Annex 3.16 for more detailed information on the methodologies (including detailed formulas and emission factors), data used to calculate CH<sub>4</sub> and N<sub>2</sub>O emissions, and emission results (including input variables) from wastewater treatment and discharge.

Refer to the Recalculations Discussion section below for details on updates implemented to improve accuracy, consistency and/or completeness of the time series.

### Domestic Wastewater CH<sub>4</sub> Emissions

Domestic wastewater CH<sub>4</sub> emissions originate from both septic systems and centralized treatment systems. Within centralized systems, CH<sub>4</sub> emissions can arise from aerobic systems that liberate

<sup>6</sup> IPCC (2019) updates, supplements, and elaborates the 2006 IPCC Guidelines where gaps or out-of-date science have been identified. EPA used these methodologies to improve completeness and include sources of greenhouse gas emissions that have not been estimated prior to the 1990 to 2019 Inventory, such as N<sub>2</sub>O emissions from industrial wastewater treatment, and to improve emission estimates for other sources, such as emissions from wastewater discharge and centralized wastewater treatment.

dissolved CH<sub>4</sub> that formed within the collection system or that are designed with periods of anaerobic activity (e.g., constructed wetlands and facultative lagoons), anaerobic systems (anaerobic lagoons and anaerobic reactors), and from anaerobic sludge digesters when the captured biogas is not completely combusted. Emissions also result from the discharge of treated effluent from centralized wastewater plants to waterbodies where carbon accumulates in sediments (typically slow-moving systems, such as lakes, reservoirs, and estuaries). The systems with emissions estimates include:

- Septic systems (A);
- Centralized treatment (B), including aerobic systems (B1, other than constructed wetlands) constructed wetlands only (B2), and constructed wetlands used as tertiary treatment (B3);
- Centralized anaerobic systems (C);
- Anaerobic sludge digesters (D); and
- Centralized wastewater treatment effluent (E).

Total domestic wastewater CH<sub>4</sub> emissions are the sum of A through E. Methodological equations for each of these systems are presented in the subsequent subsections.

#### **Methodology for Septic Systems (CH<sub>4</sub>) Emissions (A):**

Methane emissions from septic systems were estimated by multiplying the U.S. population by the percent of wastewater treated in septic systems and a country-specific emission factor and then converting the result to kt/year. The method was selected in accordance with IPCC methodological decision trees based on available data for septic systems.

U.S. population data were taken from historic U.S. Census Bureau national population totals data and include the populations of the United States and Puerto Rico (U.S. Census Bureau 2002; U.S. Census Bureau 2011; U.S. Census Bureau 2021 and 2023b; Instituto de Estadísticas de Puerto Rico 2021). Population data for American Samoa, Guam, Northern Mariana Islands, and the U.S. Virgin Islands were taken from the U.S. Census Bureau International Database (U.S. Census Bureau 2024). The fraction of the U.S. population using septic systems or centralized treatment systems is based on data from the *American Housing Surveys* (U.S. Census Bureau 2023a). See Annex 3.16 for more details on methods and inputs, including data and emission factor values applied in calculations.

#### **Methodology for Centrally Treated Aerobic and Anaerobic Systems (CH<sub>4</sub>) Emissions (B, C):**

Methane emissions from POTWs depend on the total organics in wastewater (TOW). The TOW was determined using BOD generation rates per capita weighted average both with and without kitchen scraps as well as an estimated percent of housing units that utilize kitchen garbage disposals. Households with garbage disposals (with kitchen scraps or ground up food scraps) typically have wastewater with higher BOD than households without garbage disposals due to increased organic matter contributions (ERG 2018a).

Methane emissions from POTWs were estimated by multiplying the total organics in centrally treated wastewater (total BOD<sub>5</sub>) produced per capita in the United States by the percent of wastewater treated centrally, or percent collected, the correction factor for additional industrial BOD discharged to the sewer system, the relative percentage of wastewater treated by aerobic systems (other than

constructed wetlands), constructed wetlands only, and anaerobic systems, and the emission factor<sup>7</sup> for aerobic systems, constructed wetlands only, and anaerobic systems.

In the United States, the removal of sludge<sup>8</sup> from wastewater reduces the BOD of the wastewater that undergoes aerobic treatment. The amount of this reduction (S) is estimated using the default IPCC (2019) methodology and multiplying the amount of sludge removed from wastewater treatment in the United States by the default factors in IPCC (2019) to estimate the amount of BOD removed based on whether the treatment system has primary treatment with no anaerobic sludge digestion (assumed to be zero by expert judgment), primary treatment with anaerobic sludge digestion, or secondary treatment without primary treatment. The organic component removed from anaerobic wastewater treatment and the amount of CH<sub>4</sub> recovered or flared from both aerobic and anaerobic wastewater treatment were set equal to the IPCC default of zero. The IPCC (2019) default emission factors used account for the dissolved CH<sub>4</sub> entering the centralized treatment systems.

Constructed wetlands provide aerobic treatment but also exhibit partially anaerobic conditions; however, they are referred to in this chapter as aerobic systems. Emissions from all constructed wetland systems for wastewater treatment were included in the estimates of emissions from centralized wastewater treatment plant processes and effluent from these plants. Methane emissions equations from constructed wetlands used as sole treatment were previously described. Methane emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow from treatment to constructed wetlands, wastewater BOD concentration entering tertiary treatment, constructed wetlands emission factor, and then converting to kt/year.

For constructed wetlands, an IPCC default emission factor for surface flow wetlands was used. This is the most conservative factor for constructed wetlands and was recommended by IPCC (2014) when the type of constructed wetland is not known. A median BOD<sub>5</sub> concentration of 9.1 mg/L was used for wastewater entering constructed wetlands used as tertiary treatment based on U.S. secondary treatment standards for POTWs. This median value is based on plants generally utilizing simple settling and biological treatment (EPA 2013). Constructed wetlands do not have secondary sludge removal.

Data sources and methodologies for centrally treated anaerobic systems are similar to those described for aerobic systems, other than constructed wetlands. See discussion above and see Annex 3.16 for more details on methods and inputs, including data and emission factor values applied in calculations.

#### **Methodology for Anaerobic Sludge Digester (CH<sub>4</sub>) Emissions (D):**

Total CH<sub>4</sub> emissions from anaerobic sludge digesters were estimated by multiplying the wastewater influent flow to POTWs with anaerobic sludge digesters, the cubic feet of digester gas generated per person per day divided by the flow to POTWs, the fraction of CH<sub>4</sub> in biogas, the density of CH<sub>4</sub>, one minus the destruction efficiency from burning the biogas in an energy/thermal device and then converting the results to kt/year. See Annex 3.16 for more details on methods and inputs, including data and emission factor values applied in calculations.

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<sup>7</sup> Emission factors are calculated by multiplying the maximum CH<sub>4</sub>-producing capacity of domestic wastewater (B<sub>0</sub>, 0.6 kg CH<sub>4</sub>/kg BOD) and the appropriate methane correction factors (MCF) for aerobic (0.03) and anaerobic (0.8) systems (IPCC 2019, Table 6.3) and constructed wetlands (0.4) (IPCC 2014, Table 6.4).

<sup>8</sup> Throughout this document, the term “sludge” refers to the solids separated during the treatment of municipal wastewater. The definition includes domestic septage. “Biosolids” refers to treated sewage sludge that meets the EPA pollutant and pathogen requirements for land application and surface disposal.

### Methodology for Discharge of Centralized Treatment Effluent (CH<sub>4</sub>) Emissions (E):

Methane emissions from the discharge of wastewater treatment effluent were estimated by multiplying the total BOD of the discharged wastewater effluent by an emission factor associated with the location of the discharge. The BOD in treated effluent was determined by multiplying the total organics in centrally treated wastewater by the percent of wastewater treated in primary, secondary, and tertiary treatment, and the fraction of organics remaining after primary treatment (one minus the fraction of organics removed from primary treatment, secondary treatment, and tertiary treatment). The percent of wastewater effluent discharged to slow-moving versus other water bodies (e.g., rivers) was determined via the methodology presented in ERG (2021a). Most wastewater effluent is discharged to other water bodies (62 percent in 2023). See Annex 3.16 for more details on methods and inputs, including data and emission factor values applied in calculations.

### Industrial Wastewater CH<sub>4</sub> Emissions

Industrial wastewater CH<sub>4</sub> emissions originate from on-site treatment systems, typically comprised of biological treatment operations. The collection systems at an industrial plant are not as extensive as domestic wastewater sewer systems; therefore, it is not expected that dissolved CH<sub>4</sub> will form during collection. However, some treatment systems are designed to have anaerobic activity (e.g., anaerobic reactors or lagoons), or may periodically have anaerobic conditions form (facultative lagoons or large stabilization basins). Emissions will also result from discharge of treated effluent to waterbodies where carbon accumulates in sediments (typically slow-moving systems, such as lakes, reservoirs, and estuaries).

Industry categories that are likely to produce significant CH<sub>4</sub> emissions from wastewater treatment were identified and included in this *Inventary*. The main criteria used to identify U.S. industries likely to generate CH<sub>4</sub> from wastewater treatment are whether an industry generates high volumes of wastewater, whether there is a high organic wastewater load, and whether the wastewater is treated using methods that result in CH<sub>4</sub> emissions. The top six industries that meet these criteria are pulp and paper manufacturing; meat and poultry processing; vegetables, fruits, and juices processing; starch-based ethanol production; petroleum refining; and breweries. Further discussion of wastewater treatment for each industry is included below. Total industrial wastewater CH<sub>4</sub> emissions are the sum of A through L.

**Table 7-9: Industrial Wastewater Treatment Systems with (CH<sub>4</sub>) Emissions**

Industry	Treatment			Effluent
	Aerobic	Anaerobic	Other	
Pulp and paper manufacturing	A1	A2		G
Red meat processing		B1		H
Poultry processing		B2		
Vegetables, fruits, and juices processing		C		I
Starch-based Ethanol Production, Dry Milling		D1, D3	D2, D4	J
Starch-based Ethanol Production, Wet Milling		D5	D6	
Petroleum Refining	E			K
Non-craft Breweries		F1, F2		L
Craft Breweries		F3, F4		

### **Methodology for Industrial Wastewater Treatment Systems (CH<sub>4</sub>) Emissions (A through F):**

The general IPCC equation (Equation 6.4, IPCC 2019) is used to estimate CH<sub>4</sub> emissions from each type of treatment system used for each industrial category, the TOW<sub>i</sub>, minus the organic component removed from aerobic wastewater treatment (S<sub>i</sub>), is multiplied by the system-specific emissions factor (kg CH<sub>4</sub>/kg COD) all minus any methane recovered for the industrial sector. The TOW for each industrial category, were estimated by multiplying the total industrial product (i.e., production) by the wastewater outflow by the amount of COD in a unit of wastewater. For some industries, U.S.-specific data on organics loading is reported as BOD rather than COD. In those cases, an industry-specific COD:BOD ratio is used to convert the organics loading to COD.

The amount of organics treated in each type of wastewater treatment system was determined using the percent of wastewater in the industry that is treated on site and whether the treatment system is anaerobic, aerobic or partially anaerobic. For CH<sub>4</sub> emissions, wastewater treated in anaerobic lagoons or reactors was categorized as “anaerobic”, wastewater treated in aerated stabilization basins or facultative lagoons were classified as “ASB” (meaning there may be pockets of anaerobic activity), and wastewater treated in aerobic systems such as activated sludge systems were classified as “aerobic/other.” See Annex 3.16 for details on the industrial wastewater treatment systems in place.

The amount of organic component removed from aerobic wastewater treatment as a result of sludge removal (S<sub>aerobic</sub>) was either estimated as an industry-specific percent removal, if available, or as an estimate of sludge produced by the treatment system and IPCC default factors for the amount of organic component removed (K<sub>rem</sub>). See Annex 3.16 for more details on methods and inputs, including data and emission factor values applied in calculations, for each industry.

### **Methodology for Discharge of Industrial Wastewater Treatment Effluent (CH<sub>4</sub>) Emissions (G through L):**

Methane emissions from discharge of industrial wastewater treatment effluent are estimated via a Tier 1 method for all industries except for pulp, paper, and paperboard in accordance with IPCC methodological decision trees in based on available data for treatment and discharge. Emissions from discharge of pulp, paper, and paperboard treatment effluent is estimated via a Tier 2 method and is described in the industry-specific data section. Tier 1 emissions from effluent are estimated by multiplying the total organic content of the discharged wastewater effluent by an emission factor associated with the discharge.

The COD or BOD in industrial treated effluent (TOW<sub>EFFLUENT,IND</sub>) was determined by multiplying the total organics in the industry’s untreated wastewater that is treated on site by an industry-specific percent removal where available or a more general percent removal based on biological treatment for other industries. See Annex 3.16 for more details on methods and inputs, including data and emission factor values applied in calculations, for each industry.

## **Domestic Wastewater N<sub>2</sub>O Emissions**

Domestic wastewater N<sub>2</sub>O emissions originate from both septic systems and POTWs. Within these centralized systems, N<sub>2</sub>O emissions can result from aerobic systems, including systems like constructed wetlands. Emissions will also result from discharge of centrally treated wastewater to waterbodies with nutrient-impacted/eutrophic conditions. The systems with emission estimates are:

- Septic systems (A);

- Centralized treatment (B), including aerobic systems (other than constructed wetlands) (B1), constructed wetlands only (B2), and constructed wetlands used as tertiary treatment (B3);
- Centralized anaerobic systems (C); and
- Centralized wastewater treatment effluent (D).

The total domestic wastewater N<sub>2</sub>O emissions are the sum of A through D. Methodological equations for each of these systems are presented in the subsequent subsections while detailed information on methods and inputs, including data and emission factor values applied in calculations is included in Annex 3.16 of this report; total domestic N<sub>2</sub>O emissions are summarized as follows:

#### **Methodology for Septic Systems (N<sub>2</sub>O) Emissions (A):**

Nitrous oxide emissions from domestic treatment depend on the nitrogen present, in this case, in the form of protein. Per capita protein consumption (kg protein/person/year) was determined by multiplying per capita annual food availability data and its protein content. Those data are then adjusted using a factor to account for the fraction of protein actually consumed.

Nitrous oxide emissions from septic systems were estimated by multiplying the U.S. population by the percent of wastewater treated in septic systems (about 19 percent in 2023; U.S. Census Bureau 2023a), consumed protein per capita (kg protein/person/year), the fraction of N in protein, the correction factor for additional nitrogen from household products, the factor for industrial and commercial co-discharged protein into septic systems, the factor for non-consumed protein added to wastewater and an emission factor and then converting the result to kt/year. The method selected is in accordance with IPCC methodological decision trees and available data. All factors were obtained from IPCC (2019).

#### **Methodology for Centrally Treated Aerobic and Anaerobic Systems (N<sub>2</sub>O) Emissions (B, C):**

Nitrous oxide emissions from POTWs depend on the total nitrogen entering centralized wastewater treatment. The total nitrogen entering centralized wastewater treatment was estimated by multiplying the U.S. population by the percent of wastewater collected for centralized treatment (about 81 percent in 2023), the consumed protein per capita, the fraction of N in protein, the correction factor for additional N from household products, the factor for industrial and commercial co-discharged protein into wastewater treatment, and the factor for non-consumed protein added to wastewater.

Nitrous oxide emissions from POTWs were estimated by multiplying the total nitrogen entering centralized wastewater treatment, the relative percentage of wastewater treated by aerobic systems (other than constructed wetlands) and anaerobic systems, aerobic systems with constructed wetlands as the sole treatment, the respective emission factors for aerobic systems and anaerobic systems, and the conversion from N<sub>2</sub> to N<sub>2</sub>O.

Nitrous oxide emissions from constructed wetlands used as sole treatment include similar data and processes as aerobic systems other than constructed wetlands. See description above. Nitrous oxide emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow to constructed wetlands used as tertiary treatment, wastewater N concentration entering tertiary treatment, constructed wetlands emission factor, and converting to kt/year.

Data sources and methodologies for anaerobic systems are similar to those described for aerobic systems, other than constructed wetlands. See discussion above and detailed activity data within Annex 3.16 of this report.

### Methodology for Discharge of Centralized Treatment Effluent (N<sub>2</sub>O) Emissions (D):

Nitrous oxide emissions from the discharge of wastewater treatment effluent were estimated by multiplying the total nitrogen in centrally treated wastewater effluent by the percent of wastewater treated in primary, secondary, and tertiary treatment and the fraction of nitrogen remaining after primary, secondary, or tertiary treatment and then multiplying by the percent of wastewater volume routed to waterbodies with nutrient-impaired/eutrophic conditions and all other waterbodies (ERG 2021a) and emission factors for discharge to impaired waterbodies and other waterbodies from IPCC (2019).

### Industrial Wastewater N<sub>2</sub>O Emissions

Nitrous oxide emission estimates from industrial wastewater and discharge are estimated according to the Tier 1 methodologies described in the *2019 Refinement*. U.S. industry categories that are likely to produce significant N<sub>2</sub>O emissions from wastewater treatment were identified based on whether they generate high volumes of wastewater, whether there is a high nitrogen wastewater load, and whether the wastewater is treated using methods that result in N<sub>2</sub>O emissions. The top four industries that meet these criteria and were added to the *Inventory* are meat and poultry processing; petroleum refining; pulp and paper manufacturing; and breweries (ERG 2021a). See Annex 3.16 for more details on the wastewater treatment and discharge emissions and production data for these sectors for 2023. Total industrial wastewater N<sub>2</sub>O emissions are the sum of A through H.

**Table 7-10: Industrial Wastewater Treatment Systems with N<sub>2</sub>O Emissions**

Industry	Treatment	Effluent
Pulp and paper manufacturing	A	E
Meat and poultry processing	B	F
Petroleum Refining	C	G
Non-craft and craft breweries	D	H

### Methodology for Industrial Wastewater Treatment Systems (N<sub>2</sub>O) Emissions (A through D):

To estimate N<sub>2</sub>O emissions, the total nitrogen entering aerobic wastewater treatment for each industry must be calculated. Then, the emission factor provided by the *2019 Refinement* is applied to the portion of wastewater that undergoes aerobic treatment.

The total nitrogen that enters each industry's wastewater treatment system is a product of the total amount of industrial product produced, the wastewater generated per unit of product, and the nitrogen expected to be present in each cubic meter of wastewater (IPCC equation 6.13).

For the four industries of interest, the total production and the total volume of wastewater generated has already been calculated for CH<sub>4</sub> emissions. For these N<sub>2</sub>O emission estimates, the total nitrogen in the untreated wastewater was determined by multiplying the annual industry production by the average wastewater outflow and the nitrogen loading in the outflow. See Annex 3.16 for details on activity data.

Nitrous oxide emissions from industry wastewater treatment are calculated by applying an emission factor to the percent of wastewater (and therefore nitrogen) that undergoes aerobic treatment (IPCC Equation 6.11). For each industry, the degree of utilization (T<sub>i,j</sub>) is described within Annex 3.16.

### **Methodology for Industrial Wastewater Treatment Effluent (N<sub>2</sub>O) Emissions (E through H):**

Nitrous oxide emissions from industrial wastewater treatment effluent are estimated by multiplying the total nitrogen content of the discharged wastewater effluent by an emission factor associated with the location of the discharge. Where wastewater is discharged to aquatic environments with nutrient-impacted/eutrophic conditions (i.e., water bodies which are rich in nutrients and very productive in terms of aquatic animal and plant life), or environments where carbon accumulates in sediments such as lakes, reservoirs, and estuaries, the additional organic matter in the discharged wastewater is expected to increase emissions (IPCC 2019).

The total nitrogen in wastewater effluent was determined through use of a nutrient estimation tool developed by EPA's Office of Water (EPA 2019a). The Nutrient Tool uses known nutrient discharge data within defined industrial sectors or subsectors, as reported on Discharge Monitoring Reports, to estimate nutrient discharges for facilities within that sector or subsector that do not have reported nutrient discharges but are likely to discharge nutrients. The estimation considers, within each sector or subsector, elements such as the median nutrient concentration and flow, as well as the percent of facilities within the sector or subsector that have reported discharges. Data from 2018 are available for the pulp, paper, and paperboard, meat and poultry processing, and petroleum refining industries. To complete the time series, an industry-specific percent removal of nitrogen was calculated using the total nitrogen in untreated wastewater. See EPA (2019b) for a detailed discussion on the methodology and data sources used within EPA's Nutrient Tool.

Because data for breweries was not available, the removal of nitrogen was assumed to be equivalent to secondary treatment, or 40 percent (IPCC 2019). The Tier 1 emission factor (0.005 kg N<sub>2</sub>O/kg N) from IPCC (2019) was used.

## **Uncertainty**

The overall uncertainty associated with both the 2023 CH<sub>4</sub> and N<sub>2</sub>O emission estimates from wastewater treatment and discharge was calculated using the *2006 IPCC Guidelines* Approach 2 methodology (IPCC 2006). Uncertainty associated with the parameters used to estimate CH<sub>4</sub> emissions include that of numerous input variables used to model emissions from domestic wastewater and emissions from wastewater from pulp and paper manufacturing, meat and poultry processing, fruits and vegetable processing, ethanol production, petroleum refining, and breweries. Similarly, uncertainty associated with the parameters used to estimate N<sub>2</sub>O emissions include that of numerous input variables used to model emissions from domestic wastewater and emissions from wastewater from pulp and paper manufacturing, meat and poultry processing, petroleum refining, and breweries. For example, uncertainty associated with centrally treated constructed wetlands parameters including U.S. population served by constructed wetlands ( $\pm 5\%$ ), and emission ( $\pm 79$ ) and conversion factors are from IPCC (2014), whereas uncertainty associated with POTW flow to constructed wetlands and influent BOD and nitrogen concentrations were based on expert judgment ( $\pm 25\%$ , ERG 2021b). The specified probability density functions (PDFs) are assumed to be normal for most activity data and emission factors, and due to lack of data, are based on expert judgement (ERG 2021c).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 7-11. For 2023, methane emissions from wastewater treatment were estimated to be between 15.3 and 27.9 MMT CO<sub>2</sub> Eq. at the 95 percent confidence level (or in 19 out of 20 Monte Carlo stochastic simulations). This indicates a range of approximately 28 percent below to 32 percent above the 2023 emissions estimate

of 21.1 MMT CO<sub>2</sub> Eq. Nitrous oxide emissions from wastewater treatment were estimated to be between 13.1 and 60.9 MMT CO<sub>2</sub> Eq., which indicates a range of approximately 37 percent below to 193 percent above the 2023 emissions estimate of 20.8 MMT CO<sub>2</sub> Eq.

**Table 7-11: Approach 2 Quantitative Uncertainty Estimates for 2023 Emissions from Wastewater Treatment (MMT CO<sub>2</sub> Eq. and Percent)**

Source	Gas	2023 Emission Estimate (MMT CO <sub>2</sub> Eq.)	Uncertainty Range Relative to Emission Estimate <sup>a</sup>			
			(MMT CO <sub>2</sub> Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
<b>Wastewater Treatment</b>	<b>CH<sub>4</sub></b>	<b>21.1</b>	<b>15.3</b>	<b>27.9</b>	<b>-28%</b>	<b>+32%</b>
Domestic	CH <sub>4</sub>	14.0	9.4	19.7	-33%	+41%
Industrial	CH <sub>4</sub>	7.1	4.2	11.3	-42%	+58%
<b>Wastewater Treatment</b>	<b>N<sub>2</sub>O</b>	<b>20.8</b>	<b>13.1</b>	<b>60.9</b>	<b>-37%</b>	<b>+193%</b>
Domestic	N <sub>2</sub> O	20.3	12.3	60.0	-40%	+195%
Industrial	N <sub>2</sub> O	0.5	0.5	1.4	-2.2%	+199%

<sup>a</sup> Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

## QA/QC and Verification

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1 Chapter 6 of the 2006 *IPCC Guidelines* (see Annex 8 for more details). In addition to general or Tier 1 analysis,

calculation-related QC (category-specific, Tier 2) was performed for a portion of the domestic wastewater treatment discharges methodology. The calculation-related QC included continuing to assess the publicly availability of similar activity data is still based on the best available data. Confirmed that gap filling techniques are consistent with other sources used within the *Inventory*.

All transcription errors identified were corrected and documented. The QA/QC analysis did not reveal any systemic inaccuracies or incorrect input values.

## Recalculations Discussion

Several estimates were recalculated and implemented in developing the current *Inventory*.

- Population data were updated using the same and latest data sources as the state-level emissions inventory to create consistency across *Inventory* estimates. These changes affected the years 2020-2022.
- Updated percent of wastewater collected affected 2022 (U.S. Census Bureau 2023a).
- Protein data were updated to reflect available protein values available for 2010 through 2022 (FAO 2024b).
- Pulp, paper, and paperboard production data were updated to reflect revised values for 2021 and 2022 (FAO 2024a).
- Updated red meat production values for 2022, were updated based on revised data (USDA 2024a).

- Fruits and vegetables production values were updated for the time series (ERG 2022; USDA 2024c).
- Ethanol production values for 2021 and 2022 were based on revised data (RFA 2024a; RFA 2024b).
- Updated values for non-craft brewery wastewater generation were included for the years 2017 and 2022, affecting the values for 2016, 2018, 2019, and 2021 (BIER 2024).

Compared to the previous *Inventory* the cumulative effect of all these recalculations had a minor impact on the overall wastewater treatment emission estimates:

- Domestic wastewater treatment and discharge CH<sub>4</sub> emissions increased on average 0.1 percent over the timeseries, with 1990 through 2019 not changing and the largest increase of 4.6 percent (0.6MMT CO<sub>2</sub> Eq.) in 2022.
- Domestic wastewater treatment and discharge N<sub>2</sub>O emissions decreased an average 0.8 percent over the timeseries, with 1990 through 2009 not changing and the largest decrease of 5.4 percent (1.2 MMT CO<sub>2</sub> Eq.) in 2022.
- Industrial wastewater treatment and discharge CH<sub>4</sub> emissions decreased on average 0.02 percent over the timeseries, with the smallest decrease of 0.001 percent (0.0 MMT CO<sub>2</sub> Eq.) in 2020 and largest decrease of 0.4 percent (0.03 MMT CO<sub>2</sub> Eq.) in 2022.
- Industrial wastewater treatment and discharge N<sub>2</sub>O emissions decreased an average 0.01 percent over the timeseries, with the smallest decrease of 0.0 percent (0.0 MMT CO<sub>2</sub> Eq.) in 1990 to the largest decrease of 0.3 percent (0.002 MMT CO<sub>2</sub> Eq.) in 2022.

Over the time series, the total emissions on average decreased by 0.3 percent from the previous *Inventory*. The changes ranged from the smallest decrease, 0.001 percent (0.0002 MMT CO<sub>2</sub> Eq.), in 1992, to the largest decrease, 1.8 percent (0.8 MMT CO<sub>2</sub> Eq.), in 2021.

## Planned Improvements

EPA notes the following improvements will continue to be investigated as time and resources allow, but there are no immediate plans to implement them until data are available or identified:

### *Domestic-specific improvements:*

- Continue to investigate anaerobic sludge digester and biogas data compiled by the Water Environment Federation (WEF) in collaboration with other entities as a potential source of updated activity data for biogas production. Due to lack of these data, the United States continues to use another method for estimating biogas produced. This method uses the standard 100 gallons/capita/day wastewater generation factor for the United States (Ten-State Standards), which EPA believes is reasonable to estimate national emissions. However, based on stakeholder input, some regions of the United States use markedly less water due to water conservation efforts so EPA plans to investigate updated sources for this method as well.
- Investigate additional sources for estimating wastewater volume discharged and discharge location for both domestic sources with the goal being to provide additional data points along the time series, while the goal for industrial wastewater would be to update the Tier 1 discharge methodology to a Tier 2 methodology.
- Investigate additional sources for domestic wastewater treatment type in place data.

- Investigate the literature shared in expert review comments providing independent methods and estimates:
  - Song et al. (2023) concluded that CH<sub>4</sub> emissions for domestic wastewater are twice as large as those estimated via an IPCC (2019) Tier 2 method. EPA plans to compare the methodology laid out in the paper against current inventory methodology(ies). As part of this, EPA will evaluate if an update to the U.S. AD leakage rate is warranted.
  - Song et al. (2024) concluded that N<sub>2</sub>O emissions for domestic wastewater are 75 percent of those estimated via an IPCC (2019) Tier 2 method. EPA plans to compare the methodology laid out in the paper against current inventory methodology(ies).
  - Additional papers may provide updated emissions estimates or measurements that EPA plans to review for comparison purposes: Moore et al. (2023), Chong et al. (2024), Sieranen et al. (2024), and Yin et al. (2024).
- IPCC (2019) updated the methodology for the organic component removed as sludge from septic systems to account for both the fraction of the population using septic systems that are operating in compliance of system recommendations, as well as the fraction of organics in wastewater removed in sludge. While the country-specific emission factor for septic systems are based on measured data, EPA plans to compare these methods.
- Continue to review whether sufficient data exist to develop U.S.-specific CH<sub>4</sub> or N<sub>2</sub>O emission factors for centralized domestic wastewater treatment systems, including whether emissions should be differentiated for systems that incorporate biological nutrient removal operations.
- Evaluate the use of POTW BOD effluent discharge data from ICIS-NPDES.<sup>9</sup> Currently only half of POTWs report organics as BOD<sub>5</sub> so EPA would need to determine a hierarchy of parameters to appropriately sum all loads. Using these data could potentially improve the current methane emission estimates from domestic discharge, or at least provide a comparison to the current method for QA/QC.
- Evaluate the use of POTW N effluent discharge data from ICIS-NPDES. Currently only about 80 percent of POTWs report a form of N so EPA would need to determine an appropriate method to scale to the total POTW population. EPA is aware of and will investigate two methods: one is specific for industrial sources (so EPA would need to determine if this method is appropriate for domestic sources), the second was recommended by an expert commenter and includes using a TN:BOD (35:200) ratio from Metcalf & Eddy (2014). Using these data could potentially improve the current nitrous oxide emissions estimates from domestic discharge, or at least provide a comparison to the current method for QA/QC.
- Investigate additional data sources for improving the uncertainty of the estimate of N entering municipal treatment systems.
- Investigate methodologies for calculating renewable natural gas (RNG) generated from wastewater treatment digester biogas and evaluate data sources of RNG generation rates and assess calculations for potential inclusion into the *Inventory*.

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<sup>9</sup> ICIS-NPDES refers to EPA's Integrated Compliance Information System – National Pollutant Discharge Elimination System.

#### *Industrial specific-improvements:*

- Continue to evaluate literature provided by expert review commenters for potential inclusion as updates:
  - Wastewater characteristics for pulp and paper manufacturing, including reviewing an update to the current emission factor used, as well as review Esmaeeli et al. (2023) for applicable information.
  - Potential updates to brewery wastewater characteristics from Babanova et al. (2022).
  - Potential updates to slaughterhouse wastewater characteristics or treatment from Wang et al. (2021).
- Investigate additional sources for estimating wastewater volume discharged and discharge location for industrial sources.

## 7.3 Composting (Source Category 5B1)

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Composting of organic waste, such as food waste, garden (yard) and park waste, and wastewater treatment sludge and/or biosolids, is common in the United States. Composting reduces the amount of methane-generating waste entering landfills, destroys pathogens in the waste, sequesters carbon, and provides a source of organic matter. Composting can also generate a saleable product and reduce the need for chemical fertilizers when the end product is used as a fertilizer or soil amendment. This source category assumes all composting facilities are commercial, large-scale windrow composting facilities with yard trimmings as the main waste stream composted, which aligns with findings from full-scale compost infrastructure survey data published by BioCycle (2017, 2023). Of 200 major food waste composting facilities in the United States, 75 (38 percent) use the windrow method, 45 (23 percent) use the aerated static pile method, and the remainder use other methods. The BioCycle 2023 survey received responses from facilities using composting methods (e.g., aerated static piles, in-vessel composting) that are operational in the United States. However national estimates of the material processed by these facilities are not readily available; therefore, emissions estimates by composting method are not included in this source category. Residential backyard and community composting is also not included in this source category.

Composting naturally converts a large fraction of the degradable organic carbon in the waste material into carbon dioxide (CO<sub>2</sub>) through aerobic processes without anthropogenic influence. With anthropogenic influences (e.g., at commercial or large on-site composting operations), anaerobic conditions can be created in sections of the compost pile when there is excessive moisture or inadequate aeration (or mixing) of the compost pile, resulting in the formation of methane (CH<sub>4</sub>). Methane in aerobic sections of a windrow pile is generally oxidized by microorganisms, which convert the CH<sub>4</sub> to CO<sub>2</sub> emissions. Even though CO<sub>2</sub> emissions are generated, they are not included in net greenhouse gas emissions for composting. Consistent with the *2006 IPCC Guidelines*, net CO<sub>2</sub> flux from carbon stock changes in waste material are estimated and reported under the LULUCF sector. The estimated CH<sub>4</sub> released into the atmosphere ranges from less than 1 percent to a few percent of the initial carbon content in the material (IPCC 2006). Depending on how well the compost pile is managed, nitrous oxide (N<sub>2</sub>O) emissions can also be produced. The formation of N<sub>2</sub>O depends on the initial nitrogen content of the material and is mostly due to nitrogen oxide (NO<sub>x</sub>) denitrification during the

thermophilic and secondary mesophilic stages of composting (Cornell 2007). Emissions vary and range from less than 0.5 percent to 5 percent of the initial nitrogen content of the material (IPCC 2006). Animal manures are typically expected to generate more N<sub>2</sub>O than, for example, yard waste, however data are limited.

From 1990 to 2023, the amount of waste composted in the United States increased from 3,810 kt to 23,155 kt (see Table 7-14). There was some fluctuation in the amount of waste composted between 2006 to 2009 where a peak of 20,063 kt composted was observed in 2008, which decreased to 18,838 kt composted the following year, presumably driven by the economic crisis of 2009 (data not shown). Since 2009, the amount of waste composted has gradually increased commensurate with population growth. When comparing 2010 to 2023, a 26 percent increase in waste composted is observed. Emissions of CH<sub>4</sub> and N<sub>2</sub>O from composting from 2010 to 2023 have increased by the same percentage.

In 2023, CH<sub>4</sub> emissions from composting (see Table 7-12 and Table 7-13) were 2.6 MMT CO<sub>2</sub> Eq. (93 kt), and N<sub>2</sub>O emissions from composting were 1.8 MMT CO<sub>2</sub> Eq. (7 kt), representing consistent emissions trends over the past several years. Composted material primarily includes yard trimmings (grass, leaves, and tree and brush trimmings) and food scraps from the residential and commercial sectors (such as grocery stores; restaurants; and schools and businesses). The composted waste quantities reported here do not include small-scale backyard composting, community composting, or agricultural composting mainly due to the lack of consistent and comprehensive national data. Additionally, it is assumed that backyard composting tends to be a more naturally managed process with less chance of generating anaerobic conditions and CH<sub>4</sub> and N<sub>2</sub>O emissions. Agricultural composting is accounted for in Chapter 5, Section 5.4 (Agricultural Soil Management) of this *Inventory*, as most agricultural composting operations are assumed to land-apply the resultant compost to soils.

The growth in composting since the 1990s is largely due to growing legislation by state and local governments discouraging the disposal of yard trimmings and food waste in landfills and increased collection of yard trimming. Most bans or diversion laws on the disposal of yard trimmings were initiated in the early 1990s by state or local governments (U.S. Composting Council 2010). California, for example, enacted a waste diversion law for organics including yard trimmings and food scraps in 1999 (AB939) that required jurisdictions to divert 50 percent of the waste stream by 2000, or be subjected to fines. Currently, 20 states representing up to 42 percent of the nation's population have enacted legislation banning yard waste from landfill disposal (U.S. Composting Council 2022). Additional initiatives at the metro and municipal level also exist across the United States. Roughly 4,713 composting facilities exist in the United States with most (57.2 percent) composting yard trimmings only (BioCycle 2017).

In the last decade, bans and diversions for food waste have also become more common. As of 2023, ten states (California, Connecticut, Maryland, Massachusetts, New Hampshire [new as of 2023], New Jersey, New York, Oregon, Rhode Island, and Vermont) had implemented organic waste bans or mandatory recycling laws to help reduce organic waste entering landfills, with most having taken effect after 2013 (U.S. Composting Council 2024). Five local governments (Austin, TX; Boulder, CO; Hennepin County, MN; New York City, NY; Seattle, WA) have implemented organics bans; and two cities have implemented food scrap collection requirements (Portland, OR and San Francisco, CA). In most cases, organic waste reduction in landfills is accomplished by following recycling guidelines, donating excess food for human consumption, or by sending waste to organics processing facilities (Harvard Law School and CET 2019). An example of an organic waste ban as implemented by California is the California Mandatory Recycling Law (AB1826), which requires companies to comply with organic waste recycling

procedures if they produce a certain amount of organic waste and took effect on January 1, 2015 (Harvard Law School and CET 2019). In 2017, *BioCycle* released a report in which 27 of 43 states that responded to their organics recycling survey noted that food waste (collected residential, commercial, institutional, and industrial food waste) was recycled via anaerobic digestion and/or composting. These 27 states reported an estimated total of 1.8 million tons of food waste diverted from landfills in 2016 (BioCycle 2018b). In 2023, BioCycle released a report on the food waste composting infrastructure in the United States with estimated range of 5.2 to 8.8 million tons of food waste composted (35 percent of the total estimated waste composted) in 2022 (BioCycle 2023). A growing number of initiatives to encourage households and businesses to compost or beneficially reuse food waste also exist.

**Table 7-12: CH<sub>4</sub> and N<sub>2</sub>O Emissions from Composting (MMT CO<sub>2</sub> Eq.)**

Activity	1990	2005	2019	2020	2021	2022	2023
CH <sub>4</sub>	0.4	2.1	2.5	2.6	2.6	2.6	2.6
N <sub>2</sub> O	0.3	1.5	1.8	1.8	1.8	1.8	1.8
<b>Total</b>	<b>0.7</b>	<b>3.6</b>	<b>4.3</b>	<b>4.4</b>	<b>4.4</b>	<b>4.4</b>	<b>4.4</b>

Note: Totals may not sum due to independent rounding.

**Table 7-13: CH<sub>4</sub> and N<sub>2</sub>O Emissions from Composting (kt)**

Activity	1990	2005	2019	2020	2021	2022	2023
CH <sub>4</sub>	15	75	91	92	92	92	93
N <sub>2</sub> O	1	6	7	7	7	7	7

## Methodology

Methane and N<sub>2</sub>O emissions from composting depend on factors such as the type of waste composted, the amount and type of supporting material (such as wood chips and peat) used, temperature, moisture content (e.g., wet and fluid versus dry and crumbly), and aeration during the composting process.

The emissions shown in Table 7-12 and Table 7-13 were estimated using the IPCC default (Tier 1) methodology (IPCC 2006) in accordance with IPCC methodological decision trees and available data. Using this method, emissions are the product of an emission factor and the mass of organic waste composted (note: no CH<sub>4</sub> recovery is expected to occur at composting operations in the emission estimates presented):

### Equation 7-4: Greenhouse Gas Emission Calculation for Composting

$$E_i = M \times EF_i$$

where,

- E<sub>i</sub> = CH<sub>4</sub> or N<sub>2</sub>O emissions from composting, kt CH<sub>4</sub> or N<sub>2</sub>O
- M = mass of organic waste composted in kt
- EF<sub>i</sub> = emission factor for composting, 4 t CH<sub>4</sub>/kt of waste treated (wet basis) and 0.3 t N<sub>2</sub>O/kt of waste treated (wet basis) (IPCC 2006)
- i = designates either CH<sub>4</sub> or N<sub>2</sub>O

Per IPCC Tier 1 methodology defaults, the emission factors for CH<sub>4</sub> and N<sub>2</sub>O assume a moisture content of 60 percent in the wet waste (IPCC 2006). While the moisture content of composting feedstock can

vary significantly by type, composting as a process ideally proceeds between 40 to 65 percent moisture (University of Maine 2016; Cornell 1996).

Estimates of the quantity of waste composted (M, wet weight as generated) are presented in Table 7-14 for select years. Estimates of the quantity of waste composted for 1990 and 2005 were taken from EPA’s *Advancing Sustainable Materials Management: Facts and Figures 2015* (EPA 2018); estimates of the quantities composted for 2017 to 2018 were taken from EPA’s *Advancing Sustainable Materials Management: 2018 Tables and Figures* (EPA 2020); the estimate of the quantity composted for 2019 to 2023 were extrapolated using the 2018 quantity composted and a ratio of the U.S. population growth for each year between 2018 and 2023 (U.S. Census Bureau 2021; U.S. Census Bureau 2024). Estimates of waste composted by commercial facilities in Puerto Rico were provided for select years by EPA Region 2 (Kijanka 2020). This data includes amount of waste composted at three facilities in Puerto Rico for 2017, 2018, and 2019, ranging from approximately 1,200 kt to a high of 15,000 kt. The average waste composted for these years was used as the annual amount composted for the respective facility for years the facility was operational. The annual quantity of composted waste in Puerto Rico was forecasted for 2020 through 2023 using available data from prior years, assumed metro area population data near where each facility is located, and the Microsoft Excel FORECAST function to obtain annual composting estimates.

**Table 7-14: U.S. Waste Composted (kt)**

Activity	1990	2005	2019	2020	2021	2022	2023
Waste Composted	3,810	18,655	22,698	22,919	22,956	23,041	23,155

## Uncertainty

The major uncertainty drivers are the assumption that all composting emissions come from commercial windrow facilities and the use of default emission factors (IPCC 2006) which is tied to a homogenous mixture of waste processed across the country (largely yard trimmings). Data presented by BioCycle (BioCycle 2017, 2023) confirm most composting operations use the windrow method and yard trimmings are the largest share of material composted across the country, but there are other composting methods used and waste characteristics will vary at a facility level. Additionally, there are composting operations in Puerto Rico and U.S. territories that are not explicitly included in the national quantity of material composted as reported in the EPA Sustainable Materials Management Reports because the methodological scope does not include Puerto Rico and U.S. territories. EPA took steps to include emissions from Puerto Rico and U.S. Territories beginning in the 1990 to 2020 *Inventory* and will continue to seek out additional data in future *Inventories*.

The estimated uncertainty from the 2006 IPCC Guidelines is ±58 percent for the Tier 1 methodology and considers the individual emission factors applied to the default emission factors and activity data.

Emissions from composting in 2023 were estimated to range between 1.8 and 7.0 MMT CO<sub>2</sub> Eq., which indicates a range of 58 percent below to 58 percent above the 2023 emission estimate of each gas (see Table 7-15).

**Table 7-15: Tier 1 Quantitative Uncertainty Estimates for Emissions from Composting (MMT CO<sub>2</sub> Eq. and Percent)**

Source	Gas	2023 Emission Estimate (MMT CO <sub>2</sub> Eq.)	Uncertainty Range Relative to Emission Estimate			
			(MMT CO <sub>2</sub> Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Composting	CH <sub>4</sub>	2.6	1.1	4.1	-58%	+58%
Composting	N <sub>2</sub> O	1.8	0.8	2.9	-58%	+58%
<b>Composting</b>	<b>Total</b>	<b>4.4</b>	<b>1.8</b>	<b>7.0</b>	<b>-58%</b>	<b>+58%</b>

## QA/QC and Verification

General QA/QC procedures were applied to data gathering and input, documentation, and calculations consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1 Chapter 6 of the 2006 *IPCC Guidelines* (see Annex 8 for more details). No errors were found for the current *Inventory*.

## Recalculations Discussion

The population estimates for 2020 through 2022 were updated using more recent data from the U.S. Census Bureau for the 1990 through 2023 *Inventory*. The U.S. population increased by 0.008 percent in 2020 and 0.047 percent in 2021, while it decreased by 0.005 percent in 2022. Consequently, net emissions in the 1990 through 2023 *Inventory* increased in 2020 and 2021 and decreased in 2022 by the same percentages compared to the previous (1990 through 2022) *Inventory*.

## Planned Improvements

EPA completed a literature search in 2021 on emission factors and composting systems and management techniques that were documented in a draft technical memorandum. The purpose of this literature review was to compile all published emission factors specific to various composting systems and composted materials in the United States to determine whether the emission factors used in the current methodology can be revised or expanded to account for geographical differences and/or differences in composting systems used. For example, outdoor composting processes in arid regions typically require the addition of moisture compared to similar composting processes in wetter climates. In general, there is a lack of facility-specific data on the management techniques and sum of material composted to enable the use of different emission factors. EPA will continue to seek out more detailed data on composting facilities to enable this improvement in the future.

Related, EPA has received comments during previous *Inventory* cycles recommending that calculations for the composting sector be based on waste subcategories (i.e., leaves, grass and garden debris, food waste) and category-specific moisture contents. At this time, EPA is not aware of any available datasets which would enable estimations to be performed at this level of granularity. EPA will continue to search for data which could lead to the development of subcategory-specific composting emission factors to be used in future *Inventory* cycles.

EPA will also continue to seek out activity data including processing capacity and years of operation for commercial composting facilities in Puerto Rico (for additional years), Guam, and other U.S. Territories for inclusion in a future *Inventory*.

EPA received some comments to update the discussion of the composting sector to be in line with current terminology, trends, and methods. EPA will work to refresh this discussion with inputs from composting experts at EPA.

## 7.4 Anaerobic Digestion at Biogas Facilities (Source Category 5B2)

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Anaerobic digestion is a series of biological processes in the absence of oxygen in which microorganisms break down organic matter, producing biogas and digestate. The biogas primarily consists of CH<sub>4</sub>, biogenic CO<sub>2</sub>, and trace amounts of other gases such as N<sub>2</sub>O (IPCC 2006) and is often combusted to produce heat and power, or further processed into renewable natural gas or for use as a transportation fuel. Digester gas contains approximately 65 percent CH<sub>4</sub> (a normal range is 55 percent to 65 percent) and approximately 35 percent CO<sub>2</sub> (WEF 2012; EPA 1993). Methane emissions may result from a fraction of the biogas that is lost during the process due to leakages and other unexpected events (0 to 10 percent of the amount of CH<sub>4</sub> generated, IPCC 2006), collected biogas that is not completely combusted, and entrained gas bubbles and residual gas potential in the digestate. Carbon dioxide emissions are biogenic in origin and should be reported as an informational item in the Energy Sector (IPCC 2006). Volume 5 Chapter 4 of the *2006 IPCC Guidelines* notes that at biogas plants where unintentional CH<sub>4</sub> emissions are flared, CH<sub>4</sub> emissions are likely to be close to zero.

Anaerobic digesters differ based on the operating temperature, feedstock type and moisture content, and mode of operation. The operating temperature dictates the microbial communities that live in the digester. Mesophilic microbes are present at temperatures ranging from 85 to 100 degrees Fahrenheit while thermophilic microbes thrive at temperatures ranging from 122 to 140 degrees Fahrenheit (WEF 2012). Digesters may process one or more types of feedstock, including food waste; municipal wastewater solids; livestock manure; industrial wastewater and residuals; fats, oils, and grease; and other types of organic waste streams. Co-digestion (multiple feedstocks) is employed to increase methane production in cases where an organic matter type does not break down easily. In co-digestion, various organic wastes are decomposed in a singular anaerobic digester by using a combination of wastewater solids or manure and food waste from restaurants or food processing industry, a combination of manure and waste from energy crops or crop residues (EPA 2016), or alternative combinations of feedstock. The moisture content of the feedstock (wet or dry) impacts the amount of biogas generation. Wet anaerobic digesters process feedstock with a solids content of less than 15 percent while dry anaerobic digesters process feedstock with a solids content greater than 15 percent (EPA 2020). Digesters may also operate in batch or continuous mode, which affects the feedstock loading and removal. Batch anaerobic digesters are manually loaded with feedstock all at once and then manually emptied while continuous anaerobic digesters are continuously loaded and emptied with feedstock (EPA 2020).

The three main categories of anaerobic digestion facilities included in national greenhouse gas inventories include the following:

- Anaerobic digestion at biogas facilities, or stand-alone digesters, can be industry-dedicated digesters that process waste from an industry or industrial facility (typically food or beverage waste from manufacturing), or multi-source digesters that process feedstocks from various

sources (e.g., municipal food scraps, manure, food processing waste). Some stand-alone digesters also co-digest other organics such as yard waste.

- On-farm digesters manage organic matter and reduce odor generated by farm animals or crops. On-farm digesters are found mainly at dairy, swine, and poultry farms where there is the highest potential for methane production to energy conversion. On-farm digesters may also accept food waste as feedstock for co-digestion.
- Digesters at water resource recovery facilities (WRRF) produce biogas through the treatment and reduction of wastewater solids. Some WRRF facilities may also accept and co-digest food waste.

This section focuses on stand-alone anaerobic digestion at biogas facilities. Emissions from on-farm digesters are included Chapter 5 (Agriculture) and AD facilities at WRRFs are included in Section 7.2.

From 1990 to 2023, the estimated amount of waste managed by stand-alone digesters in the United States increased from approximately 988 kt to 15,094kt, an increase of 1,428 percent. As described in the Uncertainty section, no data sources present the annual amount of waste managed by these facilities prior to 2015 when the EPA began a comprehensive data collection survey. Thus, the emission estimates between 1990 and 2014, and for 2022 to 2023 are general estimates extrapolated from data collected for years 2015 to 2022 via the EPA surveys (EPA 2018, 2019, 2021, 2023, and 2024). The steady increase in the amount of waste processed over the time series is likely driven by increasing interest in using biogas produced from waste as a renewable energy source and other organics diversion goals.

In 2023, emissions from stand-alone anaerobic digestion at biogas facilities were approximately 16,906 MT CO<sub>2</sub> Eq. (0.60 kt) (see Table 7-16 and Table 7-17).

**Table 7-16: CH<sub>4</sub> Emissions from Anaerobic Digestion at Biogas Facilities (MT CO<sub>2</sub> Eq.)**

Activity	1990	2005	2019	2020	2021	2022	2023
CH <sub>4</sub> Generation	22,129	66,388	348,699	328,348	347,874	338,111	338,111
CH <sub>4</sub> Recovery	(21,023)	(63,069)	(331,264)	(311,931)	(330,480)	(321,205)	(321,205)
<b>CH<sub>4</sub> Emissions</b>	<b>1,106</b>	<b>3,319</b>	<b>17,435</b>	<b>16,417</b>	<b>17,394</b>	<b>16,906</b>	<b>16,906</b>

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

**Table 7-17: CH<sub>4</sub> Emissions from Anaerobic Digestion at Biogas Facilities (kt CH<sub>4</sub>)**

Activity	1990	2005	2019	2020	2021	2022	2023
CH <sub>4</sub> Generation	1	2	12	12	12	12	12
CH <sub>4</sub> Recovery	(1)	(2)	(12)	(11)	(12)	(11)	(11)
<b>CH<sub>4</sub> Emissions</b>	<b>+</b>	<b>+</b>	<b>0.62</b>	<b>0.59</b>	<b>0.62</b>	<b>0.60</b>	<b>0.60</b>

+ Does not exceed 0.5 kt CH<sub>4</sub>.

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

## Methodology

Methane emissions from anaerobic digestion depend on factors such as the type of waste managed, the amount and type of supporting material (such as wood chips and peat) used, temperature, moisture content (e.g., wet and fluid versus dry and crumbly), aeration during the digestion process, unintentional leakages, and how the biogas generated is used/combusted (e.g., flared, used on-site, used off-site).

The emissions presented in Table 7-16 were estimated using the IPCC default (Tier 1) methodology (Volume 5, Chapter 4, IPCC 2006) given in Equation 7-5 below, which applies a default leakage factor of 5 percent to the CH<sub>4</sub> generated, which is the product of an emission factor and the mass of organic waste processed (Equation 7-6). Only CH<sub>4</sub> emissions are estimated because N<sub>2</sub>O emissions are considered negligible (IPCC 2006). Some Tier 2 data are available (annual quantity of waste digested) for the later portion of the time series (2015 and later). The methods were selected in accordance with IPCC methodological decision trees and available data on organic waste processed.

Per the 2006 IPCC Guidelines, emissions of CH<sub>4</sub> from anaerobic digestion facilities due to unintentional leakages during process disturbances or other unexpected events are generally between 0 to 10 percent of the amount of CH<sub>4</sub> generated. When facility-specific information or data are unavailable, a 5 percent leakage factor is recommended (IPCC 2006).

### Equation 7-5: Methane Emissions Calculation for Anaerobic Digestion

$$CH_4 \text{ Emissions} = L \times (G_{CH_4})$$

where,

CH <sub>4</sub> Emissions	=	total CH <sub>4</sub> emissions in inventory year, Gg CH <sub>4</sub>
L	=	leakage factor, default assumed 5 percent (IPCC 2006)
G <sub>CH<sub>4</sub></sub>	=	total CH <sub>4</sub> generation in inventory year, Gg CH <sub>4</sub>

### Equation 7-6: Methane Generation Calculation for Anaerobic Digestion

$$G_{CH_4} = \sum_i (M_i \times EF_i) \times 10^{-3}$$

where,

M <sub><i>i</i></sub>	=	mass of organic waste treated by biological treatment type <i>i</i> , Gg, see Table 7-18
EF	=	emission factor for treatment <i>i</i> , g CH <sub>4</sub> /kg waste treated, 0.8 Mg/Gg CH <sub>4</sub>
<i>i</i>	=	anaerobic digestion

Per IPCC Tier 1 methodology defaults, the emission factor for CH<sub>4</sub> assumes a moisture content of 60 percent in the wet waste (IPCC 2006). Both liquid and solid wastes are processed by stand-alone digesters and the moisture content entering a digester may be higher. One emission factor, 0.8 Mg/Gg CH<sub>4</sub> is applied for the entire time series (IPCC 2006 Volume 5, Chapter 4, Table 4.1).

The annual quantity of waste digested is sourced from EPA surveys of anaerobic digestion facilities (EPA 2018, 2019, 2021, 2023, and 2024). The EPA was granted the authority to survey anaerobic digestion facilities that process food waste annually through an Information Collection Request (ICR No. 2533.01). The scope includes stand-alone and co-digestion facilities (on-farm and water resource recovery facilities [WRRF]). Five reports with survey results have been published to date:

- Anaerobic Digestion Facilities Processing Food Waste in the United States (2015): Survey Results (EPA 2018)
- Anaerobic Digestion Facilities Processing Food Waste in the United States (2016): Survey Results (EPA 2019)
- Anaerobic Digestion Facilities Processing Food Waste in the United States (2017 & 2018): Survey Results (EPA 2021)

- Anaerobic Digestion Facilities Processing Food Waste in the United States (2019): Survey Results (EPA 2023).
- Anaerobic Digestion Facilities Processing Food Waste in the United States (2020 & 2021) (EPA 2024).

These reports present aggregated survey data including the annual quantity of waste processed by digester type (i.e., stand-alone, on-farm, and WRRF); waste types accepted; biogas generation and end use; and more. The amount of waste digested as reported in the survey reports were assumed to be in wet weight; the majority of stand-alone digesters were found to be wet and mesophilic (EPA 2023).

The aggregated data presented in the EPA reports are underestimates of the actual amount of processed waste and biogas produced because (1) surveys rarely achieve a 100 percent response rate and some fraction of facilities in each survey year did not respond to the survey; (2) EPA focused the surveys on facilities that primarily process food waste, although non-food waste quantities processed were also collected and reported; and (3) while the EPA has done due diligence to identify all stand-alone digesters that process food waste, EPA may not have identified all facilities across the United States and its territories.

The annual quantity of waste digested at stand-alone digesters for 1990 to 2014 (only 1990 and 2005 are shown in Table 7-18) was estimated by multiplying the count of estimated operating facilities (as presented in Table 7-19) by the weighted average of waste digested in 2015 to 2019 collected through EPA’s survey data (EPA 2018, 2019, 2021, and 2023). Masked survey responses of food and non-food waste processed were shared with the *Inventory* team by the EPA team leading the EPA AD Data Collection Surveys for 2015 to 2019. Significantly less facilities responded to the survey for 2020 and 2021 compared to prior years and it is unclear whether the reported total waste digested is representative of all operational stand-alone digesters and is therefore why the weighted average does not include data from 2020 and 2021. This assumption may be revisited when the next iteration of EPA’s survey data is published.

The number of facilities that reported annual quantities of waste digested to the EPA survey varies by year. The masked data provided by the EPA AD survey data collection team include data for 41, 44, 42, 43, and 18 facilities between 2015 to 2019, respectively. These data were used to calculate the weighted average of waste digested of 272,294 short tons.

The weighted average applied to the current *Inventory* is calculated as follows for 1990 to 2014:

### Equation 7-7: Weighted Average of Waste Processed

$$\text{Weighted Average Waste Processed} = \sum_{\text{year}} \frac{W_{\text{year}} \times \text{Fac}_{\text{year}}}{\text{Sum of All Fac}}$$

where,

- year = the year of data for the average waste processed and count of facilities in the numerator
- W = total average waste processed in the respective survey year, food and non-food waste (short tons).
- Fac = the number of facilities that reported an amount of waste processed in the respective survey year. Note the number of facilities that provided an annual quantity of waste processed data was internally shared and differs from the total number of facilities that responded to the EPA surveys as presented in EPA (2018, 2019, 2021, and 2023).

Estimates of the quantity of waste digested for 1990 to 2014 are calculated by multiplying the weighted average of waste digested from the masked survey data by the count of operating facilities in each year. This calculation assumes that each facility operates continuously from the first year of operation for the remainder of the time series. Additional efforts will be made to quantify the number of operating facilities and estimates of the total waste digested by year for future Inventories as described in the Planned Improvements section.

Estimates of the quantity digested for 2015 to 2021 were taken from EPA's AD survey data (EPA 2018, EPA 2019, EPA 2021, EPA 2023, and EPA 2024). In the 1990 to 2023 *Inventory*, the quantity of liquid, non-food waste was converted to tons using a general conversion factor of 3.8 lbs/gallon. Liquid waste was not incorporated into the EPA survey results prior to 2019 and there is an increase in the amount of waste digested annually prior to 2019 and 2019 and later years.

The EPA (2023) report provides a significant increase in data granularity for stand-alone digesters compared to earlier reports because food waste processed by the beverage sector is included as tons of food waste processed as opposed to gallons of food waste processed in prior survey years. Detail on the sources and types of the liquid food and non-food waste was not available in the 2015 to 2018 data to reliably convert the data to tons. However, the 2019 data point provides some assurance that using a general conversion factor to convert liquid waste to tons yields a more comprehensive estimate of total waste processed at stand-alone AD facilities. EPA published results from the 2020 and 2021 survey on their website only (EPA 2024); a separate report with details provided in earlier years has not been published.

The estimate of waste digested for 2022 to 2023 were extrapolated using the average of the waste digested from the 2020 to 2021 survey data (EPA 2024) as a proxy. The average did not include data from 2015 and 2016 because there is a drop in the amount of waste digested by nearly 1 million tons between 2016 and 2017. The quantities digested between 2015 and 2016 are similar, and quantities digested between 2017 and 2018 are similar. The quantity digested for 2019 is nearly twice the amount of prior EPA survey years because food waste from the beverage sector were able to be accurately converted to tons. Estimates for 2022 to 2023 will be updated as future EPA survey reports are published.

**Table 7-18: Estimated U.S. Waste Digested (kt)**

Activity	1990	2005	2019	2020	2021	2022	2023
Waste Digested	988	2,964	15,567	14,658	15,530	15,094	15,094

The estimated count of operating facilities is calculated by summing the count of digesters that began operating by year over the time series. The year a digester began operating is sourced from EPA (2021). This assumes all facilities are in operation from their first year of operation throughout the remainder of the time series, including facilities prior to 1990. This is likely an overestimate of facilities operating per year but does not necessarily translate to an overestimate in the amount of waste processed because a weighted average of waste processed for the surveyed facilities is applied to these years. The number of facilities in 1990 to 2014 are directly used in calculating the emissions for those years.

**Table 7-19: Estimated Number of Stand-Alone AD Facilities Operating**

Year	1990	2005	2019	2020	2021	2022	2023
Estimated Count of Operational Facilities	4	12	54	54	54	54	54

## Uncertainty

The methodology applied for the 1990 to 2014 emissions estimates should be considered a starting point to build on in future years if additional historical data become available. Five years of facility-provided data are available (2015 to 2019) while the rest of the time series is estimated based on an assumption of facility counts and the 2015 to 2019 weighted average annual waste digested as calculated from survey data. The major limitations, and uncertainty drivers in the emissions estimates, are related to the uncertainty in assumptions to ensure completeness across the time series and the limitations in the EPA AD survey data, as described below:

1. The EPA AD surveys (EPA 2018; EPA 2019; EPA 2021; EPA 2023; EPA 2024) did not receive a 100 percent response rate, meaning that the survey data represent a portion, albeit the majority, of stand-alone digesters, and annual waste processed. The methodology applied here did not attempt to estimate waste digested by facilities that did not respond to the survey, which likely underestimates the quantity of waste digested and CH<sub>4</sub> emissions.
2. The EPA AD survey data (EPA 2018; EPA 2019) present both food and non-food waste digested. The non-food waste was reported as liquid (gallons) and solid (tons). The quantity of liquid waste managed for 2015 and 2016, which is used as a proxy for 1990 to 2014, was converted to tons using a general conversion factor of 3.8 lbs/gallon. This may slightly over- or underestimate the quantity of waste digested and CH<sub>4</sub> emissions between 1990 to 2018. This conversion was not made by EPA in the survey report (EPA 2018). However, EPA (2021) did convert the liquid waste managed to tons for 2017 and 2018 using the general conversion factor of 3.8 lbs/gallon.
3. The assumption required to estimate the activity data for 1990 to 2014 may overestimate the number of facilities in operation because it assumes that each facility operates from its start year for the entire time series (i.e. facility closures are not accounted for). This introduces a large amount of uncertainty in the estimates compared to years where there is directly reported survey data. It is unclear whether this under- or over-estimates the quantity of waste digested and CH<sub>4</sub> emissions.
4. The most recent EPA AD survey data (EPA 2023; EPA 2024) includes waste processed by the beverage sector, which was not presented in prior survey years. No attempts were made to separately estimate and include this waste stream in years prior to 2019 (i.e. the EPA 2023 survey). This means that annual CH<sub>4</sub> estimates for 1990 to 2018 may be underestimated.

The estimated uncertainty from the *2006 IPCC Guidelines* is  $\pm 54$  percent for the Approach 1 methodology.

Emissions from anaerobic digestion at stand-alone biogas facilities in 2023 were estimated to be between 7,802 and 26,009 MT CO<sub>2</sub> Eq., which indicates a range of 54 percent below to 54 percent above the 2023 emission estimate of CH<sub>4</sub> (see Table 7-20). A  $\pm 20$  percent uncertainty factor is applied to the annual amount of material digested (i.e., the activity data), which was developed with expert judgment (Bronstein 2021). A  $\pm 50$  percent default uncertainty factor is applied to the CH<sub>4</sub> emission factor (IPCC 2006). Using the IPCC's error propagation equation (Equation 3.1 in IPCC 2006 Volume 1, Chapter 3), the combined uncertainty percentage is  $\pm 54$  percent.

**Table 7-20: Approach 1 Quantitative Uncertainty Estimates for Emissions from Anaerobic Digestion (MT CO<sub>2</sub> Eq. and Percent)**

Source	Gas	2023 Emission Estimate (MT CO <sub>2</sub> Eq.)	Uncertainty Range Relative to Emission Estimate			
			(MT CO <sub>2</sub> Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Anaerobic Digestion at Biogas Facilities	CH <sub>4</sub>	16,906	7,802	26,009	-54%	+54%

## QA/QC and Verification

General QA/QC procedures were applied to data gathering and input, documentation, and calculations consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1, Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). No errors were found for the current *Inventory*.

## Recalculations Discussion

The weighted average of waste digested was recalculated for the current *Inventory* to incorporate EPA AD survey data from 2019. This impacted the emissions estimates between 1990 to 2014.

In the previous *Inventory*, the amount of waste processed for 2020 through 2022 was extrapolated based on available survey data. With the publication of survey data for 2019 (EPA 2023) and 2020 and 2021 (EPA 2024), the extrapolated amounts of waste digested were updated. Recalculations for the amount of waste processed resulted in increases of 22 percent per year between 1990 to 2014, 37 percent in 2020, 30 percent in 2021, and 26 percent in 2022. Consequently, emissions estimates in the 1990 through 2023 *Inventory* increased by the same percentages these same years compared to the previous (1990 through 2022) *Inventory*.

## Planned Improvements

EPA will continue to incorporate updated survey data from future EPA AD Data Collection Surveys when the survey data are published. These revisions may change the estimated emissions for 2022 and 2023. Additionally, quality control checks on the default emission factor used to determine CH<sub>4</sub> generation is in process.

EPA will also reassess how best to estimate annual waste processed using proxy data for years between the EPA AD Data Collection Survey reports as needed (e.g., for 2022 and 2023). The methodology described here assumes the same average amount of waste is processed each year for 2022 and 2023.

EPA continues to seek out data sources to confirm the estimated number of operational facilities by year prior to 2015 and consider how best to estimate the quantity of waste processed per year by these facilities with the goal of better estimating the annual quantity of waste digested between 1990 to 2014. Available data will also be compiled where available for facilities that did not directly respond to the EPA AD Data Collection surveys for completeness.

## 7.5 Waste Incineration (Source Category 5C1)

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As stated earlier in this chapter, carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), and methane (CH<sub>4</sub>) emissions from the combustion of waste are accounted for in the Energy sector rather than in the Waste sector because almost all combustion of municipal solid waste (MSW) in the United States occurs at waste-to-energy facilities where useful energy is recovered. Similarly, the Energy sector also includes an estimate of emissions from burning waste tires and hazardous industrial waste, because virtually all of the combustion occurs in industrial and utility boilers that recover energy. The combustion of waste in the United States in 2023 resulted in 12.8 MMT CO<sub>2</sub> Eq. of emissions. For more details on emissions from the combustion of waste, see Section 3.3 of the Energy chapter.

Additional sources of emissions from waste combustion include non-hazardous industrial waste incineration and medical waste incineration. As described in Annex 5 of this report, data are not readily available for these sources and emission estimates are not provided.

An analysis of the likely level of medical waste incineration emissions was conducted based on a 2009 study of hospital/ medical/ infectious waste incinerator (HMIWI) facilities in the United States (RTI 2009). Based on that study's information of waste throughput and an analysis of the fossil-based composition of the waste, it was determined that annual greenhouse gas emissions for medical waste incineration would be below 500 kt CO<sub>2</sub> Eq. per year and considered insignificant for the purposes of national inventory reporting. More information on this analysis is provided in Annex 5.

Furthermore, an analysis was conducted on the likely level of sewage sludge incineration emissions based on the total amount of sewage sludge generated and assumed percent incineration. Based on the assumed amount of sludge incinerated and non-CO<sub>2</sub> factors for solid biomass it was determined that annual greenhouse gas emissions for sewage sludge incineration would be below 500 kt CO<sub>2</sub> Eq. per year and considered insignificant for the purposes of national inventory reporting. More information on this analysis is provided in Annex 5.

## 7.6 Waste Sources of Precursor Greenhouse Gases

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In addition to the main greenhouse gases addressed above, waste generating and handling processes are also sources of precursors to greenhouse gases. This section summarizes information on precursor emissions, which include carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), non-methane volatile organic compounds (NMVOCs), ammonia (NH<sub>3</sub>), and sulfur dioxide (SO<sub>2</sub>). These gases are not direct greenhouse gases, but can indirectly impact Earth's radiative balance by altering the concentrations of other greenhouse gases (e.g., tropospheric ozone) and atmosphere aerosol (e.g., particulate sulfate). Total emissions of NO<sub>x</sub>, CO, NMVOCs, NH<sub>3</sub>, and SO<sub>2</sub> from waste sources for the years 1990 through 2023 are provided in Table 7-21.

**Table 7-21: Emissions of NO<sub>x</sub>, CO, NMVOC, NH<sub>3</sub> and SO<sub>2</sub> from Waste (kt)**

Gas/Source	1990	2005	2019	2020	2021	2022	2023
NO <sub>x</sub>	84	51	73	76	76	75	74
CO	979	1,178	1,181	1,342	1,343	1,340	1,340
NMVOCs	870	152	156	173	172	171	171
NH <sub>3</sub>	73	18	19	84	84	83	83
SO <sub>2</sub>	36	20	23	33	32	31	31

## Methodology and Time-Series Consistency

Emission estimates for 1990 through 2023 were obtained from data published on the National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data website (EPA 2024). For Table 7-21, NEI reported emissions of CO, NO<sub>x</sub>, SO<sub>2</sub>, NH<sub>3</sub>, and NMVOCs were recategorized from NEI Emissions Inventory System (EIS) sectors. The EIS sectors were mapped to categories more closely aligned with sectors and categories in this report, based on discussions between the EPA *Inventory* and NEI staff (see crosswalk documented in Annex 6.3). EIS sectors mapped to the waste sector categories in this report include: waste disposal and recycling (landfills; publicly owned treatment works; industrial wastewater; treatment, storage, and disposal facilities; waste incineration; and other).<sup>10</sup> As described in the NEI Technical Support Documentation (TSD) (EPA 2023), emissions are estimated through a combination of emissions data submitted directly to the EPA by state, local, and tribal air agencies, as well as additional information added by the Agency from EPA emissions programs, such as the emission trading program, Toxics Release Inventory (TRI), and data collected during rule development or compliance testing. Within the NEI, there is only one EIS sector for waste generating and handling processes, so precursor estimates are aggregated in Table 7-21 for consistency with NEI reporting. Future presentations of this data may disaggregate emissions so it better maps to reporting categories in this report.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2023, which are described in detail in the NEI's TSD and on EPA's Air Pollutant Emission Trends website (EPA 2023b; EPA 2024). No quantitative estimates of uncertainty were calculated for this source category.

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<sup>10</sup> Precursor emissions from waste incineration were reported in the Energy sector in the previous *Inventory* but are not disaggregated from the Waste sector in this report.