Baltimore County Comments COMAR 26.11.42 10/11/22

Baltimore County Comments on Draft Regulation COMAR 26.11.42.

Drafted by: Nick Rodricks Bureau Chief Baltimore County Bureau of Solid Waste 10/11/22

- 1. Do the regulations outline the process for facilities with existing GCCS to pursue design plan reviews? Will all facilities with existing GCCS be required to participate in design plan reviews?
- 2. Can the deadline for Installation of Solar Panels be extended? Perhaps I'm incorrect, but it seems the intention of the regulation is to incentivize Solar Panel construction on closed landfills by offering exemption up through January 2024. This leaves limited time to develop any new solar projects. Is it possible to offer a longer timeframe to commence installation of solar projects?
- 3. In Section .06 the regulation outlines the requirements for the shutdown of a Gas Collection and Control System. That threshold is set at 15 years of existing operation. In the event a closed landfill is applicable under .01-B and a new GCCS will be installed, how long will a GCCS need to be in place? Will that threshold also be set at 15 years?