

Arvia Morris

Comments on proposed draft amendments to WAC 172-441 - GHG emissions inventory

Thank you for the opportunity to provide informal comments on initial draft of the GHG emissions calculations for the Climate Commitment Act.

I am concerned that leakage from fuel infrastructure is not sufficiently or explicitly captured in your tracking system for combustion of fuels.

Perhaps, since leakage can occur with out combustion, there needs to be a separate category for leaked fuel products that are not combusted or not completely combusted but still contribute greatly to green house gas emissions. For example gas that leaks from pipelines, manure and methane, incomplete combustion products. Many studies have shown that distribution systems can have leaks that release methane to the atmosphere.

Either mass balance across the system or estimates based on published studies need to be used to account for the GHG impacts from these leaks and incomplete combustion products.

Similarly there are leaks of volatile organics in the petroleum refinery plants that must be accounted for. There are even NSPS and MACS that require the measurement of these leaks. The compounds that have significant global warming potential should be separately accounted for and reported.

Nitros oxides are powerful GHG gases and these don't seem to be captured in this draft rule. Municipal Sewage Treatment facilities are not an EITE source. They are certainly a significant source of GHG emissions. The practice of spreading sewage sludge on forest and agricultural lands is also a significant source of GHG emissions, mostly N₂O, why are these sources not included in the methodology for tracking GHG? Nitrous oxide (NO) is a powerful contributor to global warming. It is 265 times more effective at trapping heat in the atmosphere than carbon dioxide and depletes our ozone layer. It has a long half life. The impact of 1 pound of N₂O on warming the atmosphere is almost 300 times that of 1 pound of carbon dioxide. Please account for the chemistry of N₂O in the atmosphere in this rule.

I also believe the public needs more time to make comments. If they knew these items were not included in the rule they may have similar concerns. Could you leave the comment period open till August 14th? Thank you for considering.