

Washington Refuse & Recycling Association

WRRRA supported HB 1663, the enacting legislation for this rulemaking. Much of the language for the statute was copied directly from California's Landfill Methane Rule. A significant portion of the draft rule language here appears to track directly with the California rule. WRRRA supports the approach of drawing on California's well-developed rule for rulemaking/gap filling here. WRRRA landfill members are generally familiar with the California rule and some operate facilities covered by the California rule.

WRRRA is reviewing and will provide additional comments on sections that include requirements beyond the enacting statute, RCW 70A.540, and the California rule. To provide the best dialogue, it would be helpful to flag where the rule departs/adds to the Washington statute or the California rules in future drafts.

Thank you for the opportunity to comment on this rulemaking.