

## Snohomish County Solid Waste

We have one closed MSW landfill where the new Rule may apply, but it accepted waste for only part of 1992, which triggers Rule applicability as currently written. The draft Rule likely considers the age of the landfill and the expected methane production since 1992; however, for landfills that accepted waste for only part of 1992, it makes sense to add a clause to cover this special scenario because such landfills received significantly less waste during 1992 and therefore have also produced significantly less methane relative to a site that accepted waste for the entirety of 1992 and after.

Therefore, perhaps the applicability of the Rule could be tied to the amount of waste added during 1992 for sites that closed during that year and are therefore marginally not exempt? Our suggestion would be that the waste limit exemption for either active or closed landfills (450K or 750K tons, respectively as written in the draft Rule) be applied to the amount of waste accepted in 1992. If the amount of waste accepted by a landfill in 1992 does not exceed one/either of those amounts, the Rule does not apply and the site is exempt.

Thank you for the opportunity to comment on the rulemaking process.