

Industrious Labs

Awesome. Katherine K-A-T-H-E-R-I-N-E, Blauvelt is spelled B as in Boy, L-A-U, V as in Victor, E-L-T. I'm a Circular Economy Director for Industrious Labs, which works across the country to support decarbonization of industry, including landfills. I just want to say thank you to the Department of Ecology for shepherding this role, and certainly saw a number of improvements from the very preliminary rule that was provided. Unfortunately, the draft rule as it stands leaves quite a number of effective strategies, parameters, and technologies on the table. There's a real opportunity for Ecology to indeed strengthen the final rule and really make sure that the rule accomplishes what the legislature set out for the state, which is effectively mitigating methane from landfills. I'll just note a couple particular pathways. Just again, want to emphasize what we've heard from other folks today, which is the current looking for methane leaks, the current system is like Swiss cheese. We simply don't have to have that be the case anymore, because there are technologies, whether it's satellites or air flights, flying over to identify super emitter events, or it's using drone or other remote sensing technology, that technology is available today. This is the opportunity, really the only opportunity for Ecology to recognize that and include that in the rule, instead of the current, as I read it, sort of shuts the door on that. I also want to draw a distinction between allowing an alternative pathway and a requirement. We should always require the most effective practices, not make it optional. We are currently on an honor system using emissions monitoring technology and practices that are not getting the job done. Then one other piece that I wanted to note was simply the fact that there are a number of instances in the rule where surface emission monitoring and gas collection systems are weakened. I'll just give one example, which is the rule currently allows, during the detection of annual monitoring, if the leak cannot be remediated within 10 calendar days, that will result in a return to quarterly monitoring of the landfill. That is faulty logic. The length of time of remediation of a leak does not indicate whether there will be a leak in the future. There are many simple tweaks to the rule that can simply help us ensure that the rule does the job that it needs to, which is check these landfill emissions and methane emissions that are coming out of the ground today. Thanks.