



To: Bill Flagg ([bill.flagg@ecy.wa.gov](mailto:bill.flagg@ecy.wa.gov))  
Rulemaking Lead  
Air Quality Program  
WA Department of Ecology  
P.O. Box 47600  
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Re: [Public Comment](#)—Rulemaking on Chapter 173-408 WAC, Landfill Methane Emissions

Mr. Flagg,

The Greater Maple Valley Unincorporated Area Council (GMVUAC) provides herein Public Comment on Department of Ecology's (DOE) newly proposed rules of [Chapter 173-408 WAC](#) Landfill Methane Emissions.

Founded in 1977 the GMVUAC is a community council of volunteer citizens who reside in the unincorporated portion of the greater Maple Valley area. We advocate with King County, Regional, and State officials for the interests of the citizens of our unincorporated area. Our website, [www.gmvuac.org](http://www.gmvuac.org), details our past and ongoing work in a vast variety of areas of interest to the many people of our area.

Our *Vision Statement* is:

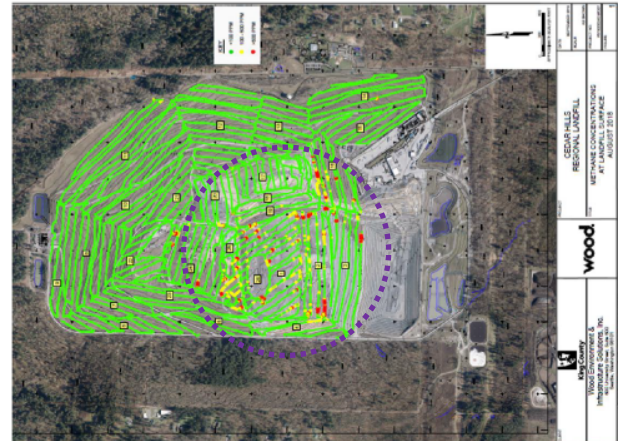
*“Our community’s Rural Character will be supported by facilitating strong local ties and communication between the public, organizations, and government; promoting locally owned businesses and supporting quality education; protecting the environment and maintaining landowners’ rights and responsibilities; promoting controlled and well-planned growth with appropriate infrastructure; ensuring proper representation for rural interests and needs; and supporting the health and safety and the privacy of our vibrant community.”*

We have studied many documents from Washington state laws, environmental studies by various organizations and Cedar Hills Regional Landfill (CHRLF) reports. We are bothered with the impacts of CHRLF releasing methane into the atmosphere on our health, eco systems and environment. The CHRLF is in our backyard, we live with it 7/24/365. Therefore, we are apprehensive regarding the effects that it has on our family, friends, neighbors (human and animal) and environment.

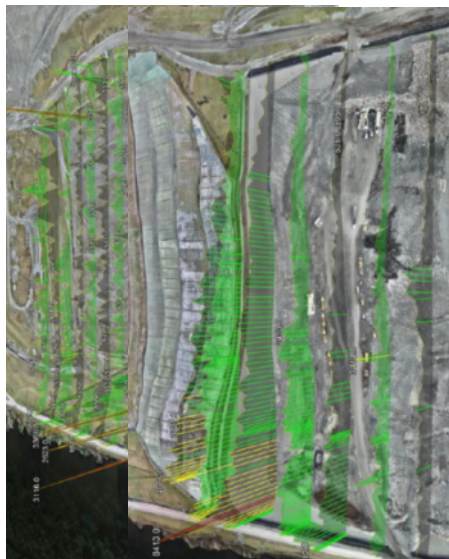
CHRLF opened in the 1960's and continues to operate past its original closing date in 1992 by filing permit extensions. There is concern that the new proposed DOE rules on methane emissions will only apply to certain portions of landfills with the use of exceptions, such as staging and active areas

being excluded due to them being considered dangerous. In reference to WAC-173-408-010 Policy and Purpose, the new, and hopefully stronger, rules MUST apply to ALL parts of landfills with NO EXCEPTIONS.

It is troubling as we read reports on the CHRLF methane emissions from [Bio Energy Washington \(BEW\)](#), the King County Solid Waste Division (KCSWD) and Wood Environmental report because they relay contradictory values. The BEW and Wood Environmental reports show violations where the self-monitoring of KCSWD did not. The exceedances found in the BEW and Wood reports were often found in the areas that are excluded from KCSWD self-monitoring practices.



King County CHRLF employee manual Report Wood Environmental DRONE Report



BEW Drone Partial Report (just the lower part of the circled areas above from Wood and KCSWD)

We recommend a standard process be developed for ALL landfills in the state so that apples to apples comparison can be performed easier. This would mean defining the technology parameters to be used and frequency of scans. Our recommendation is to use self-recording electronic devices versus manual readings performed with varying levels of accuracy due to the human element. Data consistency and storage of data creates a reliable history in methane emission which can be utilized to find potential trends. If all landfills used a drone, it may even be possible to respond to nearby odor

complaints immediately by measuring any methane that may be present in buffer zones near the odor complaints and find a resolution.

When a variance in methane measurement regulations is discovered, there needs to be a clear plan on which regulatory agency (Puget Sound Clean Air, DOE, KCSWD, etc.) is the prevailing decision. In other words, all the agencies should be operating with the same rules.

Considering frequency of monitoring, here in the Pacific Northwest we have vastly different weather day to day which can likely have some sort of effect on methane measurements in the atmosphere (like rain tends to limit pollution, it is assumed it would be the same with methane emissions), we endorse that bi-monthly recordings be taken, with drones, to alert landfill staff earlier rather than later of a potential gas leak, thereby reducing the impact that it may have on our ecology.

Regarding the WAC 173-408-030 Applicability section, it is disturbing that methane emission monitoring is performed on some landfills (Municipal Solid Waste (MSW)) and not others since some limited purpose landfills do receive organic materials. We propose that ANY landfill that contains organic materials be monitored for methane emissions regardless of type of landfill.

We advocate that self-monitoring should not be used to report Methane levels to the state's DOE, and instead institute a regulation that only "certified" outside companies can perform "official" reporting to DOE.

In conclusion, the GMVUAC, thanks you for the opportunity to provide input during rule making for this new chapter on methane emissions.

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