

Jacquelyn Green

I'm a citizen that lives near the Cedar Hills Landfill. Cedar Hills Landfill has a long history of non-compliance, litigation, and emissions that harm the surrounding community. My children attend Maple Hills Elementary, which is located only a couple thousand feet from the Cedar Hills Landfill. The children at the school are at an increased health risk due to the emissions from landfill operations. I applaud and encourage stricter emissions to protect children and reduce greenhouse gas emissions. As the DOE considers new rule making, I ask that for the following items to be considered in the rule making process:

1. All areas of landfills should be monitored, with the exception of active areas that are accepting new waste. Cedar Hills has been shown to wildly exceed their permitted emissions. This was discovered by drone fly over completed by BioEnergy WA, public information request videos provided by King County Solid Waste showing exceedances, a class action lawsuit in 2000, and another class action lawsuit in the late 2000's that poisoned several homeowners. One of the ways Cedar Hills has evaded regulatory agency oversight is to not monitor sloped areas and interim areas. DOE should require monitoring on ALL areas (except active) to accurately gauge emissions. If ground monitoring cannot be done, drone monitoring should be required.
2. Cedar Hills Landfill is planning and has adopted a large scale expansion. This will include top filling closed areas, top filling interim areas, and constructing an additional area. DOE should not allow top filling of closed or interim areas, due to damage that construction and additional filling will cause to existing gas collection systems and also the amount of methane that will be released when permanent or interim covers are removed or damaged due to top filling and/or construction.
3. DOE should require that all landfills be in compliance of emission regulations before expansion activities are permitted. If current emissions are not in compliance, increasing the size of the problem will only increase emission issues.
4. Landfills that are located within two miles of schools or underserved communities should be tightly held to DOE rules regarding landfill emissions. DOE has a responsibility to protect children and communities who have been historically underserved/under represented. DOE must consider social equity and social justice.
5. DOE should not allow alternative compliance requests. Industries regularly use these to skirt laws and protections for the environment and affected communities. If DOE will be allowing alternative compliance requests, all alternative compliance requests should be made available to the public for comment and review.
6. DOE should dictate what type of landfill each facility is, rather than allowing the landfills to self-categorize.

Thank you for your consideration.