

## Suellen Mele

Thank you for this opportunity to testify on proposed draft rules on landfill methane. I'm Suellen Mele, S-U-E-L-L-E-N M-E-L-E. I live in Seattle, and although I'm now retired, I worked for close to 25 years on recycling and waste prevention issues, and I'm currently volunteering with the 350 Washington Civic Action Team, as well as 350 Seattle. However, the following comments solely reflect my own point of view. As we watch the climate emergency becoming more and more severe, it's clear that we're running out of time. Methane is a super pollutant, and landfills are a major source of methane in Washington. We need to act as boldly and quickly as we are able. I appreciate the improvements to the draft rules already made by Ecology, but I urge you to further strengthen those rules. Every fraction of a degree increase that we can prevent is important. I want to briefly address three big-picture areas of the rules now, and then we'll follow up with more detailed written comments. First, it's critically important to get the monitoring requirement right. Landfills settle and shift so frequent and comprehensive monitoring is needed. I was extremely concerned to read a recent Grist article describing how EPA inspections at three Washington landfills found excessive levels of methane emissions. Some readings showed concentrations above 10,000 parts per million, more than 20 times higher than the federal limit. Unfortunately, the proposed draft rule does not require comprehensive monitoring and instead would lock in an ineffective and often unsafe system relying on humans walking a grid pattern to search for leaks. The rules should require, or at the very least specifically allow for, the use of remote sensing technologies such as drones. In addition, the rules should be strengthened by requiring more frequent monitoring to identify and correct problems more quickly. Second, I urge you to ensure timely planning and installation of the gas collection systems wherever possible. A recent EPA report indicated that 50% of the carbon in food waste is degraded to landfill gas within 3.6 years. We really need to get these systems in place as soon as possible. Finally, the proposed rules regarding reporting should be further improved to ensure transparency and accessibility by the public, including opportunities to comment on requested alternative compliance measures, as an earlier person here had commented on. Thank you again for this opportunity to comment, and I urge you to strengthen the rules.