

# Anonymous Anonymous

Rulemaking - Chapter 173-408 WAC, Landfill Methane Emissions

To whom this may concern:

I urge you to add LPLs to your requirements for methane emissions. Living near a landfill, I see what organic (contains carbon) material really goes to LPLs. Here in Yakima, there have been massive fires at both LPLs, so it's obvious that they are producing methane gas. I'm attaching a document from an LPL here in Yakima that had a large fire (front page of the Seattle Times I believe). The document from DOE describes the waste stream, which contains both inert and not inert material which does off gas methane. 2/2 in Yakima for underground fires at LPLs would also demonstrate that decaying organic material makes heat, thus also producing methane. Wouldn't it make sense that these are issues at all LPLs? DOE and LPLs are not checking every load to make sure that each load is 100% inert (impossible and unreasonable). I urge you to add requirements for methane testing and collecting at all LPLs. It makes sense! Thank you!

**Landfill Gas Monitoring**

Currently there is no landfill gas (LFG) monitoring requirement for the Caton LPL. The lack of landfill gas monitoring is based on the assumption that production of methane should be "minimal due to the relatively inert nature of the waste stream and the aridity of the site" (2007 Operations and Maintenance Manual). It should be noted that the waste stream includes a number of materials that are not inert such as shrubs, leaves, grass clippings, cardboard, paper, wood, furniture, shredded rubber, and clothing. The recurrence of fire in the waste at this facility also demonstrates that the waste is not inert, and the risk of a subsurface fire is significant. The November 2022 fire event was significant at the facility, see Ecology's November 18, 2022, letter for more detailed recommendations regarding fire response follow-up.

WAC 173-350-400 requires all limited purpose landfills to be designed to control and monitor explosive gas (typically methane) production, migration, and emissions during active operations as well as during the post-closure period. Landfill gas monitoring is also a required component for consideration of ending post-closure care under WAC 173-350-400(11). The requirements of WAC 173-350 are the minimum functional standards for solid waste facilities of this type, but this site's history of fires indicates that additional requirements may be necessary to protect human health and the environment. A gas collection system may be needed to characterize emissions of both explosive gases, fire indicator parameters, and hazardous compounds generated in and emanating from the waste. Ecology recommends development of a LFG collection/venting and monitoring plan that includes collection/venting and sampling of gas from the waste, as well as gas sampling from native soil around the perimeter of the waste.

**Financial Assurance**