

RMI

Thank you. My name is Ellie Garland, E-L-L-I-E G-A-R-L-A-N-D, and I'm a senior associate with RMI. RMI is an independent, nonpartisan nonprofit working to secure a clean, prosperous, zero-carbon future for all, and we're very grateful to the Washington State Department of Ecology for taking steps to control planet-warming methane emissions from landfills. As leaders around the world have underscored at this year's COP, fast action on methane is the single best strategy we have to limit near-term warming, and curbing emissions from landfills must be a part of this climate strategy. Beyond the climate benefits, stronger landfill standards bring important safeguards to communities living near landfills who face related impacts from air pollution and odors. We encourage Ecology to move swiftly toward a strong final rule, and we offer the following suggestions for further improvements around methane monitoring, data transparency, and gas capture. First, we recommend Ecology update the surface emission monitoring protocols to encourage the use of the most effective, readily available methane detection technologies. We urge Ecology to look to the US EPA's approved drone method and allow flexibility for future approved alternatives. Advanced detection technologies like drones are cost-effective, efficient, enhance worker safety, and provide better coverage of the landfill surface, including the working phase, than traditional CEM. Importantly, advanced automated methods are also less susceptible to human error or judgment. Canada is taking steps to mandate drone surveys in their proposed regulatory framework, and we encourage Ecology to follow suit. We also recommend Ecology take advantage of publicly available remote sensing data from aerial and satellite technologies to alert operators of large emission events and prompt fast repairs. We've seen successful campaigns conducted in Pennsylvania and California that leverage remote sensing data and have resulted in effective and quantifiable methane abatement. In addition, to improve transparency, we encourage Ecology to expand public access in a timely manner to landfills and emissions data. Finally, we encourage Ecology to take further steps to improve methane capture through more timely installation and expansion of the landfill gas collection system. EPA analysis shows that gas collection and control system expansion within one year of waste in place is feasible, cost-effective, and critical to control emissions from fast-decaying waste, like food waste. We encourage Ecology to consider other best practices that boost gas collection system efficiency and performance, such as automated well-tuning and more robust cover practices. A strong final rule is a win-win for the climate and communities, and we commend Washington's leadership and thank you again for your consideration.