



WASHINGTON REFUSE & RECYCLING ASSOCIATION

March 25, 2020

Ms. Fran Sant
Rulemaking Lead
Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

RE: Greenhouse Gas Assessment for Projects (GAP rule) WAC 173-445

Dear Ms. Sant:

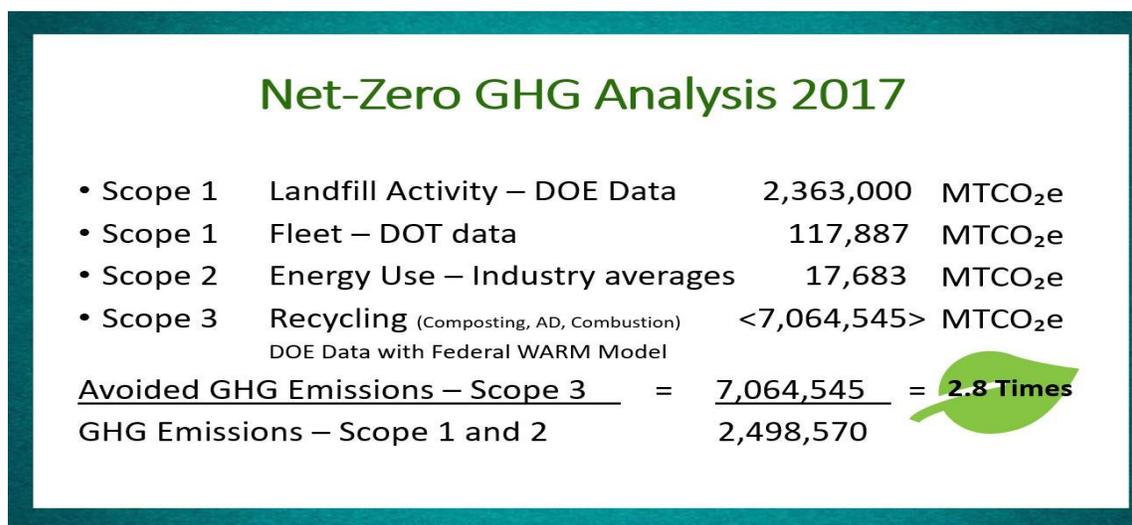
The Washington Refuse and Recycling Association (WRRA) is the oldest Solid Waste Trade Association operating on the West Coast of the United States, founded 73 years ago. WRRA represents the private sector solid waste and real recycling industry in Washington - from curbside collection service to state of the art recycling facilities and landfills. WRRA member companies and the solid waste industry serve a vital role in public health, safety, and environmental protection.

Our members work in their communities every day and provide essential services. Washington's solid waste system is a successful public-private partnership. Washington's regulated and municipal solid waste collection system provides for excellent service, has consistently beat the national recycling rate by double digits, and maintains family wage jobs in every community in which we operate— all at a transparent and affordable price. We have an obligation to serve and to provide universal service as directed by the state and local governments.

We appreciate the opportunity to comment on the early draft of the WAC 173-445 Greenhouse Gas Assessment for Projects (GAP rule). A number of WRRA members that operate landfills and other large waste and recycling facilities in Washington may also comment on the draft rule. The National Waste & Recycling Association (NWRA) will also comment on the proposed plan. WRRA will not duplicate those comments, but supports and incorporates the comments submitted by NWRA and member companies.

WRRRA Members as Environmental Leaders

WRRRA generally supports the Department's goal to reduce greenhouse gas emissions from large projects. WRRRA members have always been environmental leaders that get real results. Through a successful public-private partnership, Washington has become a national leader on recycling. Our recycling rates hover around 50% and beats the national recycling rate of 32% by double digits. Through all of the materials we recycle, our industry is net zero on greenhouse gas emissions. In fact, Washington's recycling and solid waste industry has avoided 2.8 times more GHGs than have been emitted (see the attached Net-Zero GHG Analysis study produced by Edgars & Associates).



WRRRA members were early adopters of cleaner burning compressed natural gas (CNG) collection fleets and operate methane capture and gas-to-energy facilities at landfills, efficient waste-by-rail networks, composting facilities, and material recovery facilities responsible for the majority of real recycling. WRRRA members are producing renewable natural gas and electricity from landfill gas in Washington.

Clarification & Additional Guidance

WRRRA echoes comments from the NWRA and requests additional examples or communication on how this rule could apply to landfills and other large waste and/or recycling facilities. The examples provided in Appendix B and rule language that discuss “inputs and outputs” may work well for traditional stack emissions but raise questions for our member’s facilities. WRRRA members have also expressed confusion about when the GAP rule and assessment would trigger. Clearly incorporating the GAP into SEPA process would help mitigate the overlap and confusion between the two rules.

WRRRA member facilities do not fit the traditional mold for emission reduction programs because our industry does not produce the wastes we receive. Rather, our members have the obligation to manage the waste generated by others as an essential public health service. Furthermore, landfill emissions cannot be directly measured, only estimated. The EPA recognizes that current models have the potential to overestimate methane generation by up to 400% for individual facilities. Landfills also play a substantial role in carbon sequestration, which the coming mitigation portions of the rule should consider.

Next Steps

We appreciate the opportunity to comment on this rule. WRRRA asks that the Department consult with the industry and association on any future action regarding the rule and its application to waste facilities over a longer timeline. A 1-month comment window is not enough time to review and provide meaningful feedback on technical rule language.

Waste management is an integral component of any plan to achieve environmental progress. WRRRA members have stood as national leaders on environmental issues and the association looks forward to future communication regarding this rule.

Please direct any questions or comments to Rod Whittaker at rod@wrra.org. Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink that reads "Brad R. Lovaas". The signature is written in a cursive, flowing style.

Brad R. Lovaas

Executive Director