August 1, 2025

Department of Ecology
Climate Pollution Reduction Program
Adam Saul
PO BOX 47600
Olympia, WA 98504-7600
Submitted Electronically

RE: Chapter 173-424 WAC, CR 102 Clean Fuels Program Rule

Dear Mr. Saul:

I am co-owner of the George DeRuyter and Sons Dairy and D&J Dairy in Outlook, Washington, between Yakima and Sunnyside. We were the first dairy in Eastern Washington to install a manure-based anaerobic digester back in 2006, and I've experienced the ebb and flow of renewable energy programs for 20 years. One of the main lessons from this experience is that digesters are expensive to build and operate and there must be significant and reliable incentives in place to finance and sustain them. I urge Ecology to keep this fact in mind as the Clean Fuels Program Rule is finalized.

Our digester is at the center of a set of processes that help turn manure "waste" into valuable, low carbon products – 1) renewable natural gas (RNG) that has a very low carbon intensity (CI) of better than -240 gCO2e/MJ; and 2) pathogen- and odor-free bedding and recovered nutrient rich solids in the form of an easily transported biofertilizer that displaces chemical fertilizers and also returns carbon and micronutrients to the soil. After the digester converts approximately 70% of the available carbon in cow manure to biogas, which is cleaned to pipeline quality RNG, we run the digestate through a screw press (primary separation) and blower to produce high-quality cow bedding. Most of the remaining fine solids from primary separation are removed by a DAF (dissolved air flotation) device that recovers organic nitrogen and phosphorus, along with micronutrients, for a biofertilizer we apply to our croplands at carefully controlled rates. The remaining "tea water" is then sent to a third treatment step, an NDN (nitrification denitrification) pond to convert much of the remaining ammonia into inert nitrogen gas (N2, which makes up 78% of the atmosphere).

This advanced clean air and clean water system helps to make our dairy one of the lowest carbon and sustainable dairies in the country. The digester at the heart of the system, and production of the lowest carbon RNG fuel available, only happens because of state low carbon fuel standard credits and federal D3 RIN credits. When credit prices are low, it's a breakeven proposition. To finance digester projects, investors need to have confidence in healthy credit markets and at least a 20-year crediting period.

Regarding the Clean Fuels Program Rule, I urge Ecology to:

1. Follow the science and provide at least 20-year crediting for real and measurable avoided dairy methane emissions; don't be distracted by anti-dairy extremists who will use any opportunity to end dairying and animal agriculture
2. Coordinate with CA and OR on rules and standards so there is effectively a common low carbon fuels market in West Coast states for greater stability and efficiency
3. Allow for the free flow of low carbon fuels within the common market (using book and claim accounting) and flexibility for new technologies.

Thank you for the opportunity to submit these comments. Please feel free to contact me if you have any questions or would like to discuss any of my comments. We look forward to selling low carbon RNG into a healthy Washington Clean Fuels Program in the near future.

Sincerely,

Dan DeRuyter, Co-owner

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