



OREGON REFUSE & RECYCLING ASSOCIATION

November 24, 2010

Jill Inahara
Oregon DEQ
Air Quality Division
811 SW Sixth Avenue
Portland, OR 97204

sent via email only to:
AQFeb2011Rules@deq.state.or.us

Subject: Comments on Proposed PM_{2.5} and Greenhouse Gas Regulations

Dear Ms. Inahara:

Oregon Refuse & Recycling Association (ORRA) is the statewide trade association representing the majority of private solid waste management companies in Oregon. ORRA members collect and process most of Oregon's residential and commercial refuse and recyclables, as well as operate material recovery facilities and many of Oregon's municipal solid waste transfer stations and landfills.

Thank you for the opportunity to comment on the proposed rules that would add PM_{2.5} and greenhouse gas (GHG) requirements to the Department's regulations. Air permitting issues are of critical importance to the operation of our members' facilities and their ability to compete and provide local jobs. We specifically support the comments submitted by Associated Oregon Industries (AOI). The significant effort that AOI put into their comments is reflective of the serious nature of the proposed regulations. ORRA strongly supports AOI's comments regarding the determination of the Baseline Emission Rate [OAR 340-200-0020(13)], as these regulations will affect landfills in the state that have spent tens of millions of dollars on state-of-the-art "Green Energy" projects utilizing landfill gas. We also agree with AOI's comments regarding the Definition of "Greenhouse Gas" [OAR 340-200-0020(59)] excluding CO₂ emissions from biomass. Finally, we support DEQ's option for allowing the permittee to determine the facilities baseline year between the years 2000 and 2010, when many of the referenced landfill gas to energy facilities were built.

We also urge the Environmental Quality Commission to consider these suggestions when reviewing the proposed regulations.

Thank you for this opportunity to comment.

Sincerely,

Holly Sears
Governmental Affairs Director