

OREGON REFUSE & RECYCLING ASSOCIATION

Date: April 8, 2025

To: The Honorable Members of the Oregon Senate

Re: NO vote on SB 726

The Oregon Refuse and Recycling Association (ORRA) urges a NO vote on SB 726 – the bill requiring advanced technology monitoring of methane in landfills.

Oregon Refuse and Recycling Association (ORRA) is the statewide trade association representing 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, compost facilities, and many of Oregon's municipal solid waste transfer stations and landfills in almost every community in our state.

ORRA does not oppose SB 726 on policy grounds. The idea of using drones and other advanced technologies to monitor methane emissions is one that operators and owners of landfills look forward to in the future. These technologies could replace the labor-intensive process of walking the landfill with a monitor to measure methane gas levels. Drones would allow measurements to be taken in areas that are not safe or accessible on foot, thus overcoming the limitations of the current method. However, there are a number of key factors for why ORRA opposes them at this time. They include:

- **Technology Not Ready**: The required technology for methane monitoring is not sufficiently developed for accurate commercial emissions testing. Promising technologies are not yet reliable for measuring methane emissions, especially in challenging conditions.
- **Technological Limitations**: Depending on the technology performance depends on cloud cover, snow cover, barometric pressure, precipitation and prevailing wind conditions.
- **EPA Compliance Issues:** The EPA only recognizes one alternative technology, owned by Sniffer Robotics, which does not sell the technology but offers it as a service.
- **Proprietary Technology**: The only approved technology, Sniffer Robotics, is proprietary, controlled by a single vendor, limiting market competition and has, in effect, a monopoly.
- **Operational Challenges:** The proprietary company cannot guarantee availability for all landfills in Oregon to stay compliant with federal reporting requirements.
- **Duplicative Data Gathering**: Unless the landfill uses Sniffer Robotics services, the bill requires duplicative data collection due to limited EPA-approved methods, increasing operational complexity.



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- Increased Costs to Customers: Additional costs from duplicative testing will be passed on to waste disposal customers. The legislation would effectively allow the vendor to charge whatever they want until another technology is approved by EPA.
- **DEQ's Position**: The DEQ does not require legislation to adopt the federal alternative method.

For these reasons, we urge you to vote NO on SB 726.

Thank you for your time and attention!

Craig Campbell Governmental Affairs Director