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There are many small landfills, including three in Lincoln County that closed in September of 1993 to comply with new EPA Landfill standards. They closed operation a few months after the date identified in the methane rule that requires compliance. They have fulfilled their regulatory obligations under 173-304 and have been released from any regulatory oversight in compliance with WAC 173-304. These municipal landfills have no way to generate revenue to cover new rules being adopted by the state. They no longer maintain their closure funds because those funds were released under 173-304. These landfills are also well below the waste in place requirements under the rule and will be exempt from the rule as a result. Since these municipal landfills have completed their post closure requirement of 173-304 and have been released and are exempt from the methane rule, they should be exempt from any requirement or reporting requirements under the new rule. They lack the funding, they lack the ability to generate revenue and they lack the technical expertise to complete the initial reporting requirements just to be exempt anyway. Since the rule will exempt them, they should not be burdened with the cost and effort for a simple report. I encourage Ecology to remove any reporting requirements for landfills that meet the definitions of exemption under the rule. We have three municipal landfills that fit in this category, they are well below the waste in place and they lack the financial capability, staffing and resources to hire a consultant to complete a report to show exemption. Ecology should already be aware of these facts and not need additional burden on small cities and towns to make this determination.