

# Katherine Blauvelt

Ecology should require the submittal of the SMDP instead of "upon request", as it is a key component of the rule. "A surface monitoring design plan (SMDP) must be developed that includes a topographical map that, clearly identifies the monitoring traverse and the working face, and describes the rationale for any sitespecific deviations. Plan must be updated quarterly if changes are made to monitoring traverse or working face and be provided to Ecology or the local clean air agency upon request."

Ecology should provide clear guidance, including a limit of days, as to how the the owner/operator will ensure the areas are no longer in size/duration than necessary - without this clarity, there is a vast grey area to exempt landfill surfaces from monitoring for months or years, which means game over in finding and fixing methane leaks. "Lastly, these requirements do not apply to certain areas of a MSW landfill, if the owner or operator of the landfill ensures these areas are no longer in size and no longer in duration than is necessary for the specified activity."

The draft allows for the SMDP to be submitted in PDF format. This not the 1990s. Operators survey using tech that can easily provide data points electronically and in format that can actually be analyzed. A PDF cannot be easily analyzed. I beg you to require the SMDP and SEM reporting in a spatial geographic information system map drawn to scale that includes:

- (i) The longitude and latitude coordinates of each exceedance carried to the fifth decimal place; and
- (ii) The monitoring path taken along the surface of the landfill, where applicable.

As this report details,

<https://www.beyondtoxics.org/wp-content/uploads/2025/03/Oregons-Secret-Climate-Killers-Feb-2025-Beyond-Toxics.pdf>, without the data provided it takes 100s of hours to analyze how landfill operators are complying with your requirements.