

Written Comment #7

REDICK Daniel

From: Jay Simpkins [REDACTED]
Sent: Wednesday, April 20, 2022 8:12 PM
To: REDICK Daniel
Cc: NICHOLS Darren
Subject: MSW By Rail

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Daniel, Mr. Gilbert's note about using rail to transport MSW to Central Oregon or Washington does present a good argument for dealing with Western Oregon's MSW after Coffin Butte closes. However his note does not address some areas such as:

1) Who shoulders the costs of the acquiring and operating the compaction/loading machinery at the intermodal site? Who shoulders the cost of acquiring and maintaining the specialized rail containers?

2) Green house gas emissions, road wear and manpower/equipment necessary to truck the MSW from the customer to the intermodal site will remain constant no matter where the ultimate disposal destination might be.

3) If several Counties each had their own intermodal site that should reduce the effects of item 2, however the associated costs might be prohibitive.

4) Starting to transfer MSW away from Coffin Butte early will indeed prolong the life of Coffin Butte. However the cost of this early long-haul movement will have to be added to existing fees charged to the customer.

5) There is an existing rail siding adjacent to the PRC that already sees (daily?) freight service. Could that become the intermodal site rather than Millersburg?

6) There is a point where the reduced annual tonnage to Coffin Butte would make it economically impractical for Republic Services (or any other business or governmental entity) to continue operate the facility under current environmental standards.

So, while Mr. Gilbert's note offers a good long-term solution it does little to help the Willamette Valley communities deal with the existing problem during the next 10-20 years. I hope that this is of some help to SWAC/DSAC. Jay Simpkins

P.S. I believe that Oregon requires the host County to have a DSAC but does not require it to have a SWAC.

Written Comment #8

REDICK Daniel

From: Jay Simpkins [REDACTED]
Sent: Thursday, April 21, 2022 8:22 AM
To: REDICK Daniel
Subject: Re: MSW By Rail

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Daniel, yup doing well. More thoughts about rail:

7) What happens to the liquid that is squeezed out of the MSW when it is being compacted into the container? Does it stay in the container

(doubtful) or does it end up on the ground at the intermodal site?

8) How is that liquid processed if it is on the ground or if it remains the container?

9) What local disturbances will be created at the intermodal site?

Even Millersburg has local residents who might be displeased by that activity.

10) How does the MSW get extracted from the container at the destination site?

I'll be listening in to the meetings next Wednesday. Yes you can include all of these as written comments. Thanks,
Jay

On 4/21/22 8:08 AM, REDICK Daniel wrote:

> Thanks for your feedback on this, Jay.

>

> Would you like me to include this as a written comment for the SWAC/DSAC meeting?

>

> Hope you're doing well!

>

> Daniel Redick

Written Comment #9

REDICK Daniel

From: [REDACTED]
Sent: Friday, April 22, 2022 9:37 PM
To: REDICK Daniel
Subject: DEQ requirements for landfill gas emissions. Background Information

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Daniel,

One of the topics for discussion for SWAC for May 24 meetings is "Methane Detection: County Greenhouse Gas Footprint".

I located the OAR on Methane gas for DEQ and DEQ rules that regulate landfill gas emissions and reporting.

I hope that this will be beneficial information for the SWAC members as background information for the "County Greenhouse Gas Footprint, if the discussion topic covers the Coffin Butte Landfill.

If you concur, would you please distribute to the SWAC members.

Thank you.

Chuck

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=6533>

<https://www.oregon.gov/deg/ghgp/Pages/Landfill-Methane-Emissions-Reduction.aspx>

In October 2021, the Environmental Quality Commission adopted new rules which regulate landfill gas emissions. The rules require many landfills in Oregon to obtain an Air Contaminant Discharge Permit to submit data on the landfill characteristics and potentially monitor, collect and/or control landfill gas emissions.

Written Comment #10

Paul Nietfeld
37049 Moss Rock Dr.
Corvallis, OR 97330
April 23, 2022

Benton County Disposal Site Advisory Committee (DSAC)

Dear Benton County Disposal Site Advisory Committee (DSAC):

With regard to the Coffin Butte landfill operated by Valley Landfills, Inc., in the interest of assisting the Benton County Board of Commissioners in disposal site management per the DSAC 2020 bylaws, I would like to propose the following:

1. Request approval from the Board of Commissioners to conduct a volumetric assessment of the Coffin Butte landfill. The purposes of this assessment would be
 - a. Provide independent verification of the volumetric information provided by the franchisee in the most recent annual report,
 - b. Establish a baseline reference from an independent expert for the tracking of intake volume from this point forward,
 - c. Determine the remaining space available in Cell 5 (current active cell), and
 - d. Determine the space available in Cell 6 (quarry) relative to the current governing Site Development Plan (2003 SDP).
2. Request approval from the Board of Commissioners to conduct a methane emission study of the Coffin Butte landfill. The purposes of this assessment would be
 - a. Measure current methane emissions from the landfill (escaping gas not processed by the current methane capture system),
 - b. Provide a basis for determining if such levels warrant corrective action and/or reporting to environmental quality agencies, and
 - c. Provide a baseline reference for methane emission levels that can be projected forward based on the expected intake volume over the remaining life of the landfill.
3. Request that the Board of Commissioners direct the Benton County Community Development Department evaluate the current impact of the Coffin Butte landfill on the community, using the 2001 Baseline report as a reference.

Sincerely,

Paul Nietfeld

Written Comment #11

Questions and Comments Regarding SWAC and DSAC Bylaws

Mark Yeager, April 25, 2022

SWAC BYLAWS

Article 3, Committees – 3(B) - who represents the Community Development Department in concurring with the creation of committees? Does this section need to state clearly that Committees cannot have membership that constitutes a quorum of the Council?

Article 4, Meetings – 4(C) – the notice requirement for work sessions (24 hours written or verbal) seems way too short. What could possibly constitute an emergency whereby the Council would have to meet in work session with on 24 hours' notice?

4(E) – What is the rationale for preventing the chair from voting if the chair's vote would result in a tie vote on a matter? If the Council is divided on a matter (and particularly when the full membership of the Council has not been appointed or is not present), it seems prudent to allow the Council to have a path for further discussion and debate, rather than one side prevailing. I do not see this language in Robert's rules, so I would appreciate some better understanding of the history and rationale of this provision.

4(H) – This section needs to be modified to reflect storage, access and availability of recordings of virtual meetings. Also, the last sentence refers to minutes being maintained by the Health Department – should that be Community Development Department?

DSAC BYLAWS

Article 2, Function – the use of the term “permittee” in Section (1), and also throughout the document seems odd give this Committee's role in service to Benton County. I understand the ORS 459.320 uses the term “permittee,” but that is in the context of the ORS and is defined earlier in that ORS chapter.

Article 3, Membership – Section 1, second paragraph, is confusing because it refers to ex officio members including “a collection and a disposal franchise holder; a person holding a permit;” as if these are different people or entities. I understand that is prefaced by saying “Commissioners may appoint...” but it is not clear because it creates confusion – franchise holder vs a person holding a permit?

Article 4, Officers – the language again appears preventing the Chair from voting if his/her vote results in a tie. See my previous comment re: SWAC bylaws.

Article 5, Subcommittees – same comments as above in SWAC bylaws.

Article 7, Meetings – Section 2, Special Meetings – same comment that 24 hours' notice is too short.

Section 4, Voting – same language preventing Chair from voting in the event of his/her vote creating a tie. See comment above in SWAC bylaws. Section 7, Notice – why does DSAC only give 3 days' notice of meetings? Section 8, Minutes – storage, access, and availability of virtual meeting recordings needs to be specified here.

Written Comment #12

REDICK Daniel

From: RAY Linda
Sent: Monday, April 25, 2022 4:50 PM
To: REDICK Daniel
Subject: FW: Traffic generation at Coffin Butte landfill

Linda Ray

Administrative Specialist
Benton County Community Development Dept.
Phone: 541-766-6819
Location: 360 SW Avery Ave. | Corvallis, OR 97333

Benton County Community Development – COVID Protocol Effective March 14, 2022

General services and inquiries are available by email and phone from 8:30 AM to 4:30 PM.

Remote meetings and in-person services are available by appointment from 9:00 AM to 1:00 PM.

Our website answers many questions and provides a guide for submitting land use applications and building permits.

Please click, write or call for more information.

- Website <https://www.co.benton.or.us/cd>
- Planning email comdevinfo@co.benton.or.us
- Building email permitcheck@co.benton.or.us
- Phone 541-766-6819

For local COVID-19 information, please see the Benton County website: <https://www.co.benton.or.us/covid19>

From: N Whitcombe [REDACTED]
Sent: Monday, April 25, 2022 4:19 PM
To: RAY Linda <Linda.Ray@Co.Benton.OR.US>
Subject: Traffic generation at Coffin Butte landfill

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear members of SWAC, Mr. Reddick,

I am trying to get some additional information about traffic generation at Coffin Butte. The operator produces an annual report that details total vehicles, but there is no breakdown of vehicle sizes that is useful to look at when one considers the impact of traffic to the landfill on the road system.

If Republic has a more granular analysis of the traffic, it would be helpful to have that information, and to be able to compare today's traffic to traffic when the landfill operated at much smaller volumes, and for as long a period going back as is possible.

For example, waste from Benton County is listed at 38,093.61 tons MSW; 10,278.95 C&D; Private Vehicles are said to haul in 53,153.64 tons, and "Total Vehicles" are shown to be 37,745, but that total is not broken down into the various categories, which if one is considering traffic impacts would be helpful to know.

I have also asked Mr. Reddick to clarify why there is a disparity between the tons originating in Benton County per the DEQ (which lists 66,000 tons) and per the landfill operator (which lists 101,526.20 tons). Is it possible that people from out-of-county say that they are from Benton County because they think that it is cheaper if they are hauling from in-county? Because the operator says that there are 53,000 tons by private vehicles to the dump that originate from Benton County. That is a lot for a county with a relatively low number of people without regular garbage service. Has the operator ever conducted an audit to see if the self-reported origination for private vehicles is accurate?

So here are my questions for the landfill operator:

1. What is the breakdown of number of vehicles in the MSW, C&D, and Private Vehicle category
2. What are vehicle sizes? What are vehicle weights?
3. What is the explanation for the disparity in the wasteshed cited by DEQ and the landfill operator?
4. What certainty is there that the origination of private vehicles as cited by the landfill operator is accurate?
5. Does the annual summary include trips from the Covanta ash piles for the daily cover?

Finally, traffic to the landfill is not the only traffic that is generated by the landfill. Does the operator have traffic volumes for the following trip generators:

1. Employee traffic
2. Leachate trucks, how many per day, what size vehicles, what weight vehicles
3. Trips to the quarry, how many per day, what size vehicles, what weight vehicles
4. Trips to the compost facility, how many per day, what size vehicles, what weight vehicles

SWAC/DSAC should ask that the landfill operator include more complete and granular information on trip generation to the landfill. That is actually the “first priority” of SWAC, per BCC Chapter 23:

***23.035 County Solid Waste Advisory Council Duties.** The Council shall assist the Board in planning and implementation of solid waste management. First priority shall be given to those areas assigned by the Board including maintenance of County roads in the vicinity of Coffin Butte*

Thanks very much,

Nancy Whitcombe