

From: [Paul Nietfeld](#)
To: [Marge](#); [REDICK Daniel](#); [Sam Imperati](#); [REDACTED]
Subject: BCTT Subcommittee A.1: suggestions for work focus
Date: Monday, October 24, 2022 5:27:44 PM
Attachments: [Nietfeld memo to SC A1 24Oct2022.pdf](#)

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Attached please see a memo outlining my suggestions for work focus that could serve as a discussion point in tomorrow's meeting.

Thank you,
Paul Nietfeld

TO: BCTT Subcommittee A.1 Landfill Size/Capacity/Longevity, Sam Imperati

FROM: Paul Nietfeld, private citizen

SUBJECT: Suggested Subcommittee A.1 work focus

DATE: October 24, 2022

As the author of the initial document that spurred the formation of this subcommittee I would like to offer my thoughts on the priorities for this team.

1. The original charge discussed for this subcommittee of "Landfill Size/Capacity/Longevity" (i.e. document the airspace volume, intake history and lifetime projections) has apparently expanded to encompass the overall history of the landfill, which could now burden this committee with reworking and extending the original draft staff submission on landfill history. **IF TRUE**, this is a significant task in itself, and while I believe that a comprehensive but readable historical record would be valuable to Benton County Commissioners and CDD Staff I think the efforts of this subcommittee would be better spent initially focusing on the critical and relatively well-defined topics of landfill life and the near-term "Quarry Problem". Input from this group on these two topics would serve Commissioners and CDD in considering any potential new CUP request as well as long-term Solid Waste Management (SWM) planning. If time allows, work on polishing a detailed historical record could be done following the completion of these first two tasks.

My recommendation, IF Subcommittee A.1 charge includes overall landfill history:

- Initially, simply compile all the history documents into a single overall document. I would suggest a section header at the beginning of each of the component documents identifying the author/source and submission date.
- Allow time for specific corrections or additions offline. These can be discussed and debated at a later meeting.
- Highlight the landfill volume history chart as key to understanding the driving force behind the disparity between past lifetime expectations (end of life on/around 2040) and the current situation in which landfill capacity exhaustion is sometimes quoted to be as soon as 3 (three) years from now.
- If time allows, edit down the history to a more useful, readable document. I think this is what the commissioners are really looking for, not a long list of newspaper headlines dating back to 1910.

2. Clarity on the projections for landfill life are key. This is important baseline information for all Benton County oversight bodies to weigh as they consider future options, including any new expansion CUP application and long-term SWM alternatives.

My recommendation:

- Include a table listing expected landfill life for a small number of cases, similar to the chart included in my September 14, 2002 BCTT workgroup presentation, along with a brief discussion of the underlying assumptions. This provides non-experts (e.g. BoC members) with an easy overview showing how the life expectancy varies with intake volume. I also think it's useful to point out how long the currently-permitted Coffin Butte airspace would last if only Benton County's trash were filling it; many citizens and some officials do not seem to understand just how small a percentage of the landfill inflow is due to the Benton County waste stream. Note that this table is based on simplifying assumptions and that the landfill operator should be responsible for providing higher-resolution lifetime estimates for various intake rate cases.
- Refer to the 2021 Site Development Plan, an official document filed with ODEQ in support of the 2020 Solid Waste Permit renewal (2021 Site Development Plan, Section 1.1 Page 1), which projects an EOL in 2039 based on an intake rate of approximately 846,274 Tons per year, **with no expansion**. As a formal filing with ODEQ, this should be noted and referenced by this subcommittee in its report as the definitive projection by the franchisee; SWAC etc. can monitor progress relative to this plan and adjust as needed. We may need to ask that the ODEQ workgroup member provide us with guidance in terms of how binding this document is considered within ODEQ.

3. A discussion of what I call the "Quarry Problem" should be part of the work of this subcommittee. I believe this is critical information for all Benton County administrators and relevant volunteers (SWAC/DSAC/Planning) to have in considering any future CUP request for expansion, and clearly relates to the landfill lifetime projection. [See the [Nietfeld - 9/14/22](#) document for a short overview of the Quarry Problem topic.]

My recommendation:

- Make it clear this short-term disposal space shortfall is the result either of extenuating, unanticipated, unavoidable circumstances, lack of foresight or planning by the franchisee, and/or a calculated play for leverage in obtaining highly-valuable additional permitted space for the corporation.
- Make it clear that this shortfall is not due to any action or inaction on the part of Benton County, and it is not Benton County's responsibility to remedy.
- Document the fact that the franchisee has a number of options for addressing the shortfall, including lowering the near-term Coffin Butte intake volume, accelerating quarry extraction, writing off unavailable (unmined) Cell 6 space, etc., and the franchisee is the only party in a position to decide which of these options (or some combination thereof) makes best economic sense.