

Disposal Site Advisory Committee (DSAC)
AGENDA
July 31, 2024
6:00 p.m. - 8:00 p.m.
4500 SW Research Way, Corvallis, OR 97333

This meeting will be held in-person. The meeting will be accessible online for those unable to attend:

Register in advance for this meeting (this may take a few minutes):

<https://us06web.zoom.us/j/88247921911?pwd=EQQu4Ofo6VVJNGuVr9KmWhTx96R6LKs.1>

Meeting ID: 882 4792 1911

Passcode: 680718

DSAC website with meeting materials:

<https://cd.bentoncountyor.gov/recycling-solid-waste/disposal-site-advisory-committee>

Agenda Item #	Start Time	Duration	Topic	Speaker
I	6:00 p.m.	5 min.	Call to Order	Chair
II	6:05 p.m.	10 min.	Welcome from Benton County Administrator	Rachel McEneny
III	6:15 p.m.	30 min.	Group Introductions – Time to get to know each other and ask questions about the Committee and its goals	All
IV	6:45 p.m.	15 min.	DSAC Orientation	Bailey Payne
V	7:00 p.m.	20 min.	Coffin Butte 2023 Annual Report overview	Ian McNab &/or Julie Jackson
VI	7:20 p.m.	25 min.	Coffin Butte 2023 Annual Report, committee review and discussion - The Committee will be able to ask questions of the Republic Services representatives prior to deliberating on what questions or recommendations the Committee wishes to convey to the Board of Commissioners about the 2023 Coffin Butte Landfill Annual Report.	All
VII	7:45 p.m.	5 min.	Schedule of future meetings	Bailey Payne
VIII	7:50 p.m.	5 min.	Request Agenda Items for our next meeting	All
IX	7:55 p.m.	5 min.	Wrap up/adjourn	Chair

Relevant Links:

If you cannot open these links in your browser, please copy and paste the link provided to view.

[Disposal Site Advisory Committee Bylaws](#)

<https://cd.bentoncountyor.gov/wp-content/uploads/2024/07/240319-Revised-DSAC-Bylaws-SIGNED.pdf>

[Benton County Development Code](#)

<https://cd.bentoncountyor.gov/codes/county-development-code/>

[Coffin Butte Landfill – 2023 Annual Report](#)

<https://cd.bentoncountyor.gov/documents/2023-landfill-annual-report/>

[Landfill Franchise Agreement - 2020](#)

<https://cd.bentoncountyor.gov/documents/2020-franchise-agreement/>

[DEQ – Plastic Pollution and Recycling Modernization Act](#)

<https://www.oregon.gov/deq/recycling/pages/modernizing-oregons-recycling-system.aspx>

[Recycling Modernization Act Flyer](#)

<https://www.oregon.gov/deq/recycling/Documents/recModORflyer.pdf>

[RMA Local Government Brochure](#)

<https://www.oregon.gov/deq/recycling/Documents/rmaLocalGovBroc.pdf>

[ORS 459](#)

https://www.oregonlegislature.gov/bills_laws/ors/ors459.html

[ORS Chapter 465](#)

https://www.oregonlegislature.gov/bills_laws/ors/ors465.html

[ORS Chapter 466](#)

https://www.oregonlegislature.gov/bills_laws/ors/ors466.html

[Robert's Rules](#)

<https://osba.org/roberts-rules-simplified-2/>

Questions about the 2023 landfill annual report

Question, Leachate:

1. How many leachate trucks travel to Corvallis municipal treatment plant each day? What route do they take?
2. How many leachate trucks travel to Salem municipal treatment plant each day? What route do they take?
3. What is the weight of a leachate truck?
4. Leachate What will happen to the leachate if municipal treatment plants in Salem & Corvallis stop taking leachate? It would be good to have a specific answer to this question, not something like “we’ll deal with that if it happens” – there has to be a plan for this, what is it?
5. Leachate already is collected that had penetrated the first liner and is collected by the system in the second liner. How much leachate is collected by the second (and final) leachate collection system?

Comment, Odor Notices:

6. It is well known that DEQ does not investigate most odor complaints. Hugh Gao, employed at DEQ, explained how it works in a phone conversation with a resident. When asked how DEQ investigates odor complaints, Hugh explained that he “...calls Ian [McNabb], Ian usually says either that there is no odor, or it was PRC generating the odor” and DEQ closes out the complaint without recording it. Page 12, detailing DEQ complaints logged, is therefore an almost useless metric to accurately describe the lived experience of people who live withing an approximate 5-mile radius of the landfill.
Personal aside: We went to look at the fire earlier in the week and the stench almost knocked us over, were there any odor complaints recorded for the date of that fire, Wednesday, July 24, either at DEQ or on the Republic odor complaint portal?

Question: Summary of Landfill Users:

7. Does the landfill charge less for people who say they trash origin is Benton County?
8. How does the landfill operator verify the county of origin?
9. What is “Industrial Waste”? Could we get a description and breakdown of the tonnage of “industrial waste” by nature?

Comments: Summary of Landfill Users seems to overweight MSW originating in Benton County:

10. The amount of waste that is shown originating in Benton County does not make sense. The chart on page 13 shows Commercial MSW at about 50,000 tons. But public hauled MSW is almost 1/5 of this total, 9,400 tons. All residents of municipalities (Corvallis, Albany, Adair, etc.) have franchise agreements for hauling, so this seems to suggest that 1/5 of Benton County’s population self-hauls MSW to the landfill. But most residents outside city limits also have curbside trash pickup. So it is hard to credit that 1/5 of Benton County’s households self-haul their weekly waste to the landfill.
Personal aside: We live outside of city limits, and even here everybody has household waste trash pickup (by Republic). So this number, fully 1/5 of Benton County’s households self-hauling household waste to the landfill is difficult to credit. The numbers don’t make sense.

11. Why does Benton County have so much more contaminated soil than larger surrounding counties? Where is that contaminated soil coming from?

Comment & question: Revenue -- How can the county verify these totals?

12. The County gets paid for each ton that the landfill accepts, so it would seem reasonable for the County to conduct an audit of Republic's numbers, to catch errors and ensure that revenues received are correct. What would be the best way to do that? How do other counties audit tonnage totals?

Questions: Traffic:

13. What is the vehicle breakdown between Commercial/Public/ADC?
14. What is the vehicle breakdown in terms of the sized of trucks?
15. How much traffic is generated by the PRC?
16. How much traffic is generated by the gas collection infrastructure?
17. How much traffic is generated by leachate haulers?

Questions: Fire

18. How many fires have there been at the landfill in 2023?
19. How often does a Republic landfill catch on fire?

Questions: Summary of Customer Complaints

20. During 2023, DSAC was suspended, and unable to facilitate complaints from the public. The "one table" of BCTT replaced DSAC during that time, and many, many complaints about the landfill were expressed during that process. Presenting only complaints received at the landfill scale house (when many were still social distancing) is not useful information. In fact, it is deceptive.

Question: Methane

21. Has Republic conducted any flyovers at the landfill to track the methane plume?
22. How much methane, of all the methane produced as waste breaks down, is captured? How much is released into the air either on the working face, or via rips in the tarps?
23. How much of the total methane produced is captured?
24. How much of the captured methane is flared off?

Question: Ugliness

25. Prior to Republic's merger with Allied waste, cells that had reached capacity were typically closed, capped and seeded with landscape plants. Since Republic's merger with Allied waste, it seems that cells that have reached capacity are just covered with very very ugly plastic tarps. What is the timeline for when those cells will receive final cover? Is it possible to plant trees on a closed cell to screen the landfill face above? The landfill is hugely ugly and can be seen for miles around.

General question: Landfill Expansion

26. If it is industry standard to start preparing a new cell 10-12 years before it is needed, why wasn't the cell in the quarry started 10-12 years ago? Alternately, why didn't Republic reduce volumes accepted at the landfill to have time to prepare the quarry site for accepting waste?

Dear Disposal Site Advisory Committee members:

Thank you to the new and continuing members who have volunteered to serve on this important committee. I appreciate that you are bringing your considerable own knowledge, skills, and experience to this challenging role.

The landfill is a complex system that poses multiple hazards to the surrounding community, as well as global climate, and just to make things more difficult, there's quite a bit of jargon to get through. So I wish you luck in quickly coming up to speed so you're able to provide effective oversight, on behalf of all of us.

One of the key duties mandated by Oregon statute (see https://oregon.public.law/statutes/ors_459.325) is:

ORS 459.325(2) Providing a forum for citizen comments, questions and concerns about the regional disposal site and promoting a dialogue between the community in which the regional disposal site is to be located and the owner or operator of the regional disposal site.

From the posted agenda, it appears that your meeting will not include time for community-member comments, questions, or concerns. So I am providing you with a short list here of concerns and questions.

Concern #1: Landfill-related fires

In the past three months, two fires have been serious enough to require an emergency response by multiple trucks from Adair Rural Fire & Rescue (volunteers), plus backup from the Corvallis fire department.

The first such fire, in early May, was in the active tipping area up on top of the landfill. The fire flared up on a Saturday evening after tipping operations had shut down for the rest of the weekend, and Republic Services personnel had left the site. The fire was reported by passing motorists who noticed smoke and alertly called 9-1-1. According to firefighters who responded, the fire appeared to originate from smoldering trash in the tipping area, and then spread to the hydraulic systems for the two "tippers."

The second such fire, just last Wednesday (July 24th), was next to one of the two open flares that are still being used to burn off excess methane from the landfill. Again, the fire flared up after hours and was called in by passersby. Firefighters were delayed in their response by a locked gate. According to one of the volunteers who responded, the fire appeared to originate from something that flew out of one of the flares (speculatively, a hot flake of metal as these flares are deteriorating with age after many years of near-constant use). The fire spread as a grass fire but fortunately was contained before it could reach the dense, doghair Douglas-fir plantation to the south.

In neither case did the landfill operators provide any notification to neighbors, despite the highly flammable situation on Republic Services' adjacent buffer lands which could allow fires to spread very rapidly.

Question 1: What is Republic's protocol for monitoring the landfill site for fires after hours?

Question 2: What is Republic's protocol for notifying neighbors in the event of a fire?

Question 3: Does Republic have any documented plan to reduce fire hazards on buffer lands, and is that plan being followed?

Concern #2: Obsolete methane flares

The two open gas flares have been in use for many years, and as noted above, may be deteriorating. According to emergency responders, these flares also generate many false alarms for 9-1-1 operators and Adair Rural Fire & Rescue.

As of January 1st, use of such flares is out of compliance with Oregon state regulations, because they are less effective than enclosed flares at reducing greenhouse gas emissions, and possibly also less effective at reducing other hazardous emissions.

A third, enclosed flare has been on site since early this year and was supposed to be installed, but the two open flares are still being used.

Question 4: Why hasn't the system been switched over to the enclosed flare by now?

Question 5: Is the landfill producing too much gas to manage the problem with a single new flare, or is it just a matter of management priorities being focused on other things?

Concern #3: Annual reporting gaps

You are being asked to review the 2023 Annual Report for the landfill and composting facility. The last time DSAC reviewed such a report was in July 2022, when DSAC was asked to review the 2021 Annual Report. Numerous errors and inconsistencies were pointed out by DSAC members and a corrected version was requested.

Question 6: Was a corrected version of the 2021 Annual Report ever submitted?

Question 7: Was a 2022 Annual Report ever submitted, and if so, who reviewed it for acceptance?

Question 8: The 2023 Annual Report makes reference to the 2023 Annual Environmental Monitoring Report (AEMR), which Republic Services is required to submit to DEQ. Have DSAC members been provided with a copy of the 2023 AEMR?

Question 9: Similarly, has the 2022 AEMR been provided for DSAC as background?

Concern #4 PFAS (popularly known as "forever chemicals")

In their 2023 Annual Report, Republic asserts that the landfill does not "produce" PFAS, but rather receives them. However they implicitly acknowledge that PFAS is being leached out of solid waste and ends up in leachate. They suggest that the PFAS coming out as leachate could be reduced by future regulations on consumer use. They also claim that there is nothing that they can do about PFAS in leachate.

Question 10: Has Republic done their own analysis of PFAS in landfill leachate, and if so, why aren't they presenting those data here?

Question 11: Are Republic's representatives aware that both the City of Corvallis and the City of Salem have tested incoming leachate from Coffin Butte for PFAS, and if so, again, why aren't they providing those data?

Question 12: Is there any evidence that the wastewater treatment plants in either Corvallis or Salem/Keizer are effective in removing PFAS that comes in from landfill leachate, and preventing PFAS from going into the Willamette River and/or biosolids that get spread on agricultural land?

Question 13: How can hypothetical future regulations on consumer products affect leachate that will be generated for years to come from the existing landfill cells, which are already full or nearly full with "legacy" waste?

Question 14: Can Republic Services provide any evidence of design calculations to evaluate the feasibility of on-site treatment of leachate generated by their existing landfill?

Question 15: What is the status of the reverse-osmosis plant and why did the company choose to stop using it?

Concern #5: Arsenic in excess of MCL in compliance boundary wells

The 2023 Annual Report includes a memorandum signed by "Ginger Rough, Sr. Manager for Public Affairs" which makes a series of questionable statements about arsenic. The memo quotes values from the Portland Basin, and the Cascade Range, and the "South Willamette Valley," asserting that Coffin Butte is in the last (rather than in the mid-Willamette Valley). The units of measure quoted are also highly questionable (milligrams per liter i.e. parts per million or ppm, rather than micrograms per liter or parts per billion or ppb).

It is well-known that arsenic is a problem in the Eugene area (e.g. around Spencer Butte) but problems with arsenic in domestic wells are nearly unknown in north Benton County and neighboring Polk County. According to the 2021 AEMR, arsenic levels in the "east-side" compliance-boundary wells at Coffin Butte have regularly been in the range 10 ppb to 30 ppb, approaching 40 ppb in one sample from around 2014.

Question 16: Why doesn't this Annual Report include up-to-date data for arsenic, among the included plots?

Question 17: Can Republic Services point to any wells in the western mid-Willamette Valley, other than at Coffin Butte, that have documented arsenic concentrations above 10 ppb? Any wells above 20 ppb? Any wells above 30 ppb? If so, where are those wells located?

Question 18: The memo states that "sampling first began in 1991" but in the 2021 AEMR no arsenic data are shown for east-side monitoring wells prior to late 1994 or early 1995. When were the east side wells first sampled for arsenic? If there are older (pre-1994) data, where are those reported?

Question 19: Can Republic Services show the complete time series for arsenic sampling in the east-side wells, as a basis for you (DSAC) to assess for yourselves whether the readings are "steady over time"?

Question 20: Mercury data were missing from the 2020 and 2021 AEMRs, despite that Republic has stated in past AEMRs that they sample for mercury as part of their standard monitoring. Can Republic present the mercury data?

Concern #6: Roadside trash

Roadside trash continues to be a problem on all roads used by Republic Services trucks and other commercial trash haulers. In 2021 local residents raised this issue in a DSAC meeting. The landfill's representative responded to the effect that all commercial trucks are required to stop and check to make sure their trailers are clean before they leave the landfill. Obviously this isn't happening on a consistent basis.

Question 21: What does Republic Services plan to do to make sure that their own truck drivers as well as other commercial haulers are stopping to check their trucks before they leave?

Question 22: There is a sign at the entrance asking truckers to do this, but it's facing outward toward trucks arriving at the landfill. Wouldn't it be more effective to have it facing in the other direction, together with a stop sign and a monitored station where drivers are required to get out and check?

Question 23: Roadside cleanup lately seems to be done only by inmate crews from Benton County Corrections. Why isn't Republic Services playing a role in cleaning up the mess created by their operation, and how are they compensating Benton County for this service?

Thank you for your attention to these questions and concerns.

Yours sincerely,
Joel Geier, Ph.D.
North Benton County resident and former DSAC member