



COMMUNITY DEVELOPMENT DEPARTMENT
4500 SW Research Way
Corvallis, OR 97333-1192
(541) 766-6819

Disposal Site Advisory Committee (DSAC)
AGENDA
October 9, 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.

<https://us06web.zoom.us/j/88247921911?pwd=EQu4Ofo6VVJNGuVr9KmWhTx96R6LKs.1>

Meeting ID: 882 4792 1911

Passcode: 680718

DSAC website with meeting materials:

<https://cd.bentoncountyor.gov/disposal-site-advisory-committee-dsac>

Agenda Item #	Start Time	Duration	Topic	Speaker(s)
1	6:00 p.m.	5 min.	Call to Order	Chair
2	6:05 p.m.	20 min.	Public comment – your comments welcome. Each commenter generally limited to 3 minutes.	
3	6:25 p.m.	10 min.	Review and approve Committee minutes for Sept. 19, 2024 – status, discussion, action. Please review the draft minutes and meeting video ahead of time. [See below].	Public
4	6:35 p.m.	10 min.	Election of Vice Chair – discussion, possible action	Committee
5	6:45 p.m.	20 min.	Fire Safety Report – David Hackleman has drafted our findings from last meeting; let’s review and finalize it and send it on to the Commissioners. [See below].	Committee
6	7:05 p.m.	5 min.	Break	All
7	7:10 p.m.	20 min.	Updated 2023 Landfill Annual Report – Republic has delayed its presentation to the Commissioners until October 15, so we have an opportunity to recap our guidance from last meeting and to add to it, including guidance on items that the Commissioners specifically questioned during their review of the first draft. [See below]	Committee



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8	7:30 p.m.	20 min.	2022 Community Concerns Annual Report – The Committee and the public have the draft to be finalized and access to its source material [See below]	Committee
9	7:50 p.m.	5 min.	Request Agenda Items, staff requests for next meeting	Committee
10	7:55 p.m.	5 min.	Next meeting/wrap up/adjourn	Chair

DSAC Membership

Benton County Staff

Name	Term	Name
Brent Pawlowski	1/1/24 - 12/31/25	Petra Schuetz, Interim Community Development Director
Chuck Gilbert	1/1/24 - 12/31/25	Bailey Payne, Solid Waste Program Coordinator
Jennifer Field	1/1/24 - 12/31/25	
Matthew Ruettgers	1/1/24 - 12/31/25	
David Hackleman	1/1/24 - 12/31/25	
Jeffrey Morrell	1/1/24 - 12/31/25	
Rachel Pursell	1/1/24 - 12/31/25	
Ken Eklund (Chair)	1/1/22 - 12/31/2024	
Ian MacNab	1/1/24 - 12/31/25	

Excused:



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Benton County
Disposal Site Advisory Committee
Packet for October 9, 2024 meeting

Contents:

1. Meeting minutes from 9/19/24 (Draft)
2. Memo on DSAC elections from Chuck Gilbert
3. Fire Safety Report from David Hackleman
4. 2023 Coffin Butte Landfill Report – Letter to BOC from Rachel Purcell
5. 2022 Community Concerns Annual Report (Draft)
6. Community concerns received from 9/18/24 – 9/30/24
7. Answers to questions for Republic Services raised at last meeting
8. Relevant news articles from 9/18/24 – 9/30/24
9. DSAC letter to Benton County Board of Commissioners regarding the Updated 2023 Coffin Butte Landfill and Pacific Region Compost Facility Annual R

Draft meeting minutes from last meeting

***DRAFT* MEETING MINUTES**
Disposal Site Advisory Committee (DSAC)
September 19, 2024

Benton County DSAC Chair Ken Eklund called the meeting to order at 6:04 pm. The meeting was open to the public virtually via a published Zoom link.

COMMITTEE MEMBERS

Ken Eklund, *Chair*
Rachel Purcell
Chuck Gilbert
Jeffrey Morrell
Brent Pawlowski
Ian MacNab, *Republic Services Representative*
David Hackleman (online)

STAFF

Petra Schuetz, *Interim Community
Development Director*
Bailey Payne, *Solid Waste Program
Coordinator*

GUESTS

Jean Weisinsee, *Community member*
Marge Popp, *Community member*
Kitty Bartee, *Community member*
Jim Fairchild, *Community member*
John Skillmon, *Community member*
Julie Jackson, *Republic Services*
Kate Harris, *Community member*
Kevin Kenaga, *Community member*
Ginger Rough, *Republic Services*
Nancy Whitcombe, *Community member*
Debbie Palmer, *Community member*
Tom Hewes, *Community member*
Joel Geier, *Community member*
Mark Henkels, *Community member*

ABSENT: Matthew Ruetters (excused), Jennifer Field

Agenda Changes

- **Item 7** (Discussion on Elections) was moved to Item 8.
- **Item 8** (Staff Presentation on Public Outreach) moved up to Item 7.

Announcements

- Committee Protocols: Limiting discussion to committee members when in session to streamline the process.

- Meeting Schedule: The committee will hold regular meetings on the second Wednesday of the month at 6:00 PM, continuing through the end of the year.
- Public Access Issues: There have been ongoing issues with timely public access to agendas and meeting materials. The committee is actively working with staff to resolve these problems. Public comments on this issue were encouraged to emphasize the need for resolution.
- Landfill Expansion: The Disposal Site Advisory Committee (DSAC) is not involved in decision-making related to Republic Services' landfill expansion application. Any testimony regarding the expansion must be submitted to the decision-making body, the Benton County [Planning Commission](#). The committee will hear concerns but cannot influence the official decision process.

Agenda Item 2: Public Comment

Marge Popp:

- Commented on difficulties finding DSAC-related information online, which used to be easily accessible. Requested more detailed and accessible information on the committee's webpage.

Jim Fairchild:

- Raised concerns about hazardous waste being deposited at the landfill, specifically incinerator ash from Marion County, and its potential environmental impacts.
- Also questioned whether ENRAC accepts public comment, as there is confusion about the public's ability to provide input at their meetings.

Republic Services Response:

- Ian MacNab (Committee Member): Explained that the incinerator ash has been tested and deemed non-hazardous. DEQ approved its use as cover material after a lengthy trial process over 10 years ago.
- Chair: Clarified that ENRAC is responsible for reviewing the landfill expansion. However, it's unclear if ENRAC will take public comment when the application becomes active. Staff will look into this further.

Online Public Comment:

Nancy Whitcombe

- Attempted to speak but experienced technical issues. She raised a concern via chat about clarifying ENRAC's role in public input, which was noted by the chair for follow-up.

Kate Harris (Soap Creek Resident):

- Expressed concerns regarding worker safety at Coffin Butte Landfill, referencing the August 6th Benton County Commissioner meeting and a recent OSHA inspection.
- Raised the following questions:
 - Why was an industrial hygienist hired only after a 2024 OSHA inspection and worker strike, and has the assessment been completed?
 - What are the safety measures in place for workers exposed to dust and contamination at the landfill?
 - Concerns about vehicles being washed without proper containment, leading to contamination of local waterways.
 - Questioned the lack of visual screening along Highway 99, required in the existing conditional use permit.

- Raised concerns about delayed implementation of stormwater management projects.
- Time limit for public comment was invoked, and she agreed to leave further comments for review of the annual report.

Tom Hewes (Soap Creek Resident):

- Raised the question of the costs to Benton County for hosting the landfill, including:
 - Road degradation, pollution, and landfill fires.
 - Decrease in land values near the landfill.
 - Post-closure costs.
- Requested any available reports addressing these costs.

Republic Services Response:

- Clarified that post-closure management is required for a minimum of 30 years after the landfill closes.
- Mentioned no existing comprehensive report on externalities related to the landfill but suggested further inquiry with the County.

Kevin Kenaga (Soap Creek Resident):

- Commented on the updated report, specifically regarding new testing for the flare at the landfill.
- Kevin Kenaga inquired about the testing procedure:
 - What is being tested?
 - When will the testing be available to the public?
- Response from Republic Services:
 - Testing is scheduled for October 22.
 - It is a standard procedure for flare or industrial devices to have initial source testing.
- Kevin Kenaga raised concerns about the daily cover at the landfill:
 - The report mentions daily cover (typically 6 inches of soil), but in reality, mesh netting is used, which doesn't prevent odors or wildlife from accessing the garbage.
 - Kevin criticized the accuracy of the report and emphasized the environmental impact of not using adequate daily cover, including increased methane emissions.
- Time limit for public comment was invoked
- Republic Services Response:
 - The daily cover used is a heavy-duty 200x200 foot tarp, not mesh netting, and is an approved alternative daily cover. Using tarps saves clean soil and airspace.

Discussion and Action Items:

- The committee emphasized the need for a structured process to follow up on public comments and questions, particularly those directed at Republic Services.
 - A suggestion was made to compile a concrete list of questions for Republic Services to address in future meetings. Staff will organize the questions and submit to Ian MacNab.
-

3. Agenda Item #3: Fire Safety at Coffin Butte Landfill

- The committee discussed recent fires at the landfill:
 - Two fires were reported this summer, one near the gas flare stacks and another on the working face of the landfill. Both were extinguished after being reported by highway drivers.
 - The committee found the fire incidents significant enough to warrant a report to the Board of Commissioners.
 - The 2023 Annual Report included some relevant information, but additional details about fire safety and responses were needed.

Proposal for Fire Safety Report

- David Hackleman volunteered to draft a report summarizing fire safety concerns, incorporating feedback from the previous meeting.
- Committee Agreement:
 - Members agreed to provide comments directly to David.
 - David will reach out to Republic Services for additional information as necessary.
 - The draft report will be reviewed at the next meeting before submission to the Board of Commissioners.

4. Agenda Item: 2021 Community Concerns Annual Report

- Discussion:
 - The report, presented in its proposed final form on page 11 of the packet, was reviewed.
 - The committee moved to approve the report to send to the Oregon DEQ to comply with state law and committee bylaws.
- Motion: To accept the report and allow for additional comments made by Rachel Purcell
- Seconded by: Jeff Morrell.
- Discussion Points:
 - A focus on concerns about Coffin Butte Road, particularly regarding traffic analysis and evacuation routes.
 - Clarifications were made about the nature of responses included in the report.
 - It was suggested that future reports provide more synthesis of comments and responses to avoid misrepresentation of concerns.
- Amendment: Rachel Purcell will add a sentence to the introduction of the report clarifying that responses may not fully address all concerns raised.
- **Vote:** Unanimously approved with amendments.

5. Agenda Item: Approval of Previous Meeting Minutes

- The committee reviewed the minutes from the previous meeting.
- Amendments:
 - Page 2: Change "2023" to "2024" in reference to the grasslands fire.
 - Page 2: Update the name from "Rick" to "Bob Kipper" for the letter supplier.
 - Page 2: Revise the sentence regarding the response to the fire to "The near fire department and Republic responded, and fire damage was contained."
- Rachel Purcell made motion to approve minutes as amended by Ken Eklund, seconded by Jeff Morrell
- Vote: Unanimously approved.
- It was suggested to approve minutes earlier in the agenda for efficiency.

6. Agenda Item: Break

- The committee took a 5-minute break.

7. Agenda Item 7: Coffin Butte Landfill 2023 Report

- The landfill report was presented at the July meeting but was not accepted by the Commissioners and returned to Republic for revisions. The revised report is now set for discussion in the upcoming October 1st Commissioners' meeting.
- The group discussed the need to provide guidance to the Commissioners regarding this updated annual report.
- A volunteer is needed to collate remarks and draft guidance for the Commissioners, as relying solely on meeting minutes may not capture the necessary nuances.

- Rachel Purcell volunteered to write a letter summarizing the DSAC concerns about the 2023 report.
- Members noted that there are specific questions regarding arsenic levels and compliance standards that should be included in the guidance.
- It was suggested to compile a list of relevant questions and comments, particularly concerning worker safety and contamination concerns.

Recommendations for the Report

- Arsenic Monitoring: Continue monitoring levels and compliance; the committee should flag ongoing concerns.
- Carbon Mapper Data: Request inclusion of carbon mapping flyover data in the report, emphasizing its relevance to landfill monitoring.
- Discuss the appropriateness of mixing 2023 and 2024 information within the annual report. Suggestion was made to maintain focus on the specific reporting year.
- EPA Inspection Clarity: Request clarification from the Commissioners on the number of exceedances reported in EPA inspections and the context of these findings.
- A discussion on the need for better context surrounding data findings, such as the number of measurements taken compared to the number of exceedances, was initiated.
- It was suggested that the guidance document include specific recommendations for Republic to enhance their reporting and transparency practices.

Discussion Points: Landfill Compliance and Methane Management:

- Republic Services mentioned weekly monitoring for exceedances, dependent on the time of year.
- Discussion on methane presence and management; acknowledgment that methane cannot be completely eliminated.
- David Hackleman acknowledged the extensive work put into the report and emphasized the need for clarity regarding the enclosed flare installation timeline.
- Raised concerns over a pre-enforcement letter received from Oregon DEQ indicating non-compliance, suggesting a full report should be requested from the Commissioners.

Fires Associated with Flares:

- Highlighted a fire incident near the flare and the need to understand the history of such events.
- Republic Services confirmed that there had been prior fire incidents at the landfill.
- Discussion on the relevance of the Carbon Mapper report and whether it should be included in the annual report. Decision made to withdraw comments regarding the Carbon Mapper from the current agenda.
- **A motion was made (Jeff Morrell) and seconded (Rachel Purcell) to recommend the acceptance of the report by the Commissioners, along with prepared comments for their consideration. The motion passed unanimously.**
- The report needs to be submitted to the Commissioners before their meeting on October 1, 2024.

8. Agenda Item #9: Public Engagement Overview

- Presentation on how Benton County is engaging with the public through the website, social media, and community involvement efforts.
- Mention of updated website features, including a timeline of developments at Coffin Butte.
- Emphasis on the Benton County trash process and email notifications for community members interested in solid waste issues.
- Communication Initiatives: Recent email blasts were sent out to the county's contact list announcing the current meeting.
- An ad regarding the meeting appeared in the Gazette Times, although some attendees expressed they had not seen it.

- Discussion on public awareness of meetings, specifically noting that the public may not know that meetings occur on the second Wednesday of each month.
- The difficulty of finding the DSAC (Development Sustainability Advisory Committee) page on the Benton County website was highlighted. Concerns were raised about outdated information and unclear navigation.
- Suggested utilizing social media and other channels to enhance outreach beyond official announcements.
- Acknowledgment of Ken's recent opinion piece that generated public interest.
- The committee agreed to empower members to disseminate information through their own networks.

9. Agenda Item #8: Election Discussion

- Elections for the chair and vice chair of DSAC are due before the first meeting of the new year, traditionally held in December.
- A proposal was made to elect a vice chair in the next meeting to relieve the current chair of meeting duties.
- Concerns regarding confidence in voting for new members were discussed, suggesting that elections should be held after members have gained sufficient experience.

Discussion on Vice Chair Appointment

- There was a discussion on the need to appoint a vice chair to balance the leadership and assist with training new members.
- It was suggested that Rachel could be a candidate for the vice chair position.
- A nomination committee was proposed to gather interest from potential candidates.
- Decision deferred until the next meeting, with an acknowledgment of an upcoming election in November or December.

Upcoming Meetings

- Clarification on the number of required meetings: The committee needs to hold at least four meetings per year. An October 9th meeting is scheduled, and the decision on November and December meetings remains open.

Proposal for Voting on Vice Chair

- David Hackleman recommended voting for a vice chair at the next meeting.
- General consensus that electing a vice chair is a good idea and will be included in the agenda for the next meeting.

10. Agenda Item #10 - Request for Agenda Items

- Matthew Ruettgers emailed the DSAC chair (Ken Eklund) about the committee's role and addressing concerns of scope creep.
- Matthew will be invited to provide input on the email, as he could not attend the current meeting.

Site Security Discussion

- David Hackleman raised the issue of site security at the landfill, specifically regarding the management of idle equipment during non-operational hours.
- This will be added as a potential agenda item for the next meeting.

11. Agenda Item #11 - Adjournment

- A motion to adjourn the meeting was made by Rachel Purcell and seconded by Brent Pawlowski.
- The motion was unanimously approved.

Next Meeting: October 9, 2024

Meeting Adjourned at: 8:09 p.m.

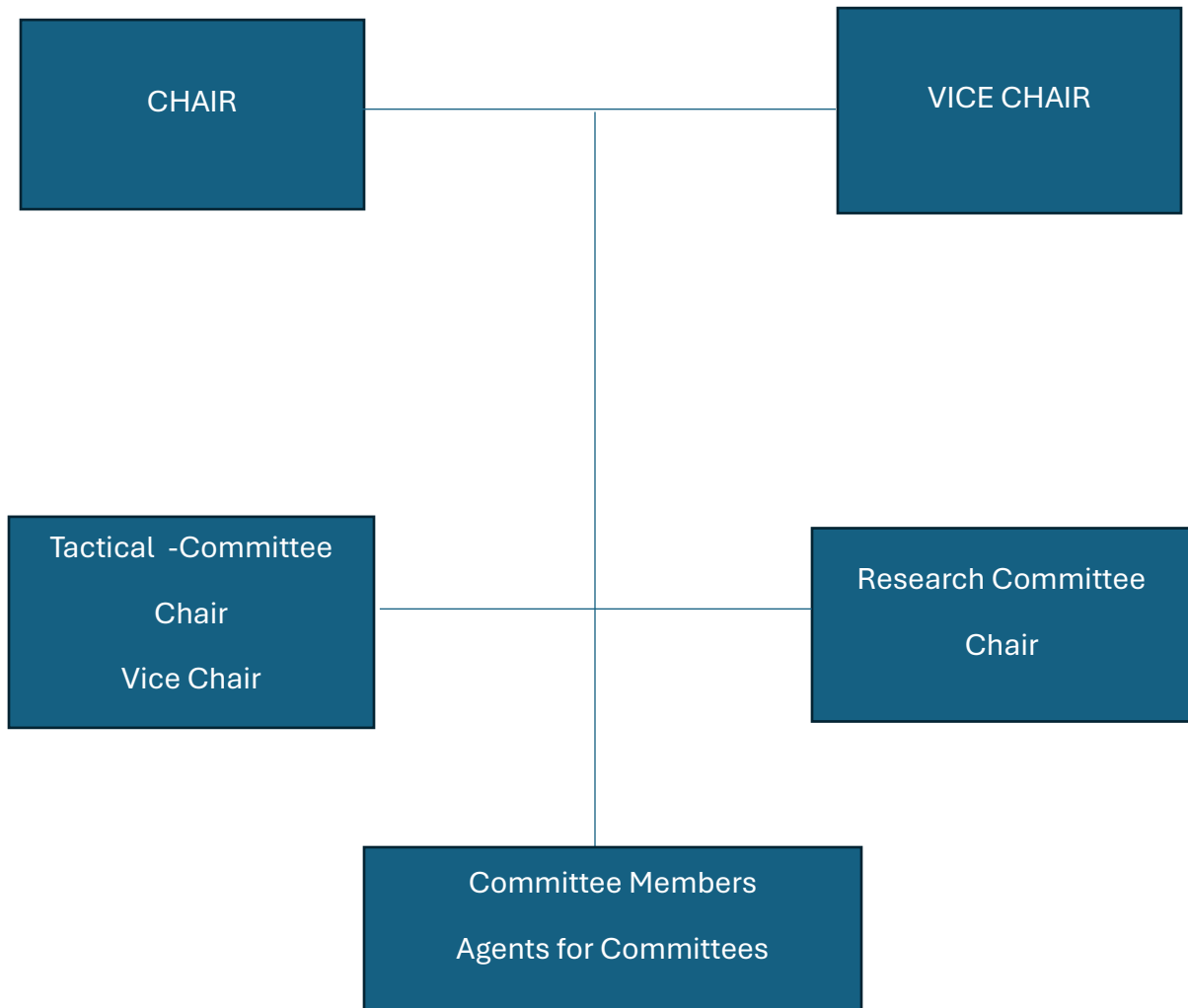
Minutes Prepared by: Bailey Payne, staff

Date of Preparation: 9/20/24

Next Steps

Issue	Assigned to:
Clarify ENRAC's public input policies and update the committee at future meetings.	Staff
The committee asked staff to consolidate public comments and questions for Republic Services.	Staff
Draft and circulate the fire safety report for committee review. Committee members to send comments or additional information to David. David Hackleman to submit the report to the chair and Mr. Payne for review.	David Hackleman
Republic Services to provide additional details on fire safety as requested.	Ian MacNab
Draft additional feedback to the board of commissioners for the Republic Services 2023 Annual Report (updated) report's introduction.	Rachel Purcell

Memo on DSAC elections from Chuck Gilbert



A. The Tactical Committee will review any request by Committee Members to assure sufficient materials presented can be researched. The Tactical Committee will be also an advisory committee to the Research Committee.

B. The Research Committee will compile a report to the Committee Members to with the committee's charges.

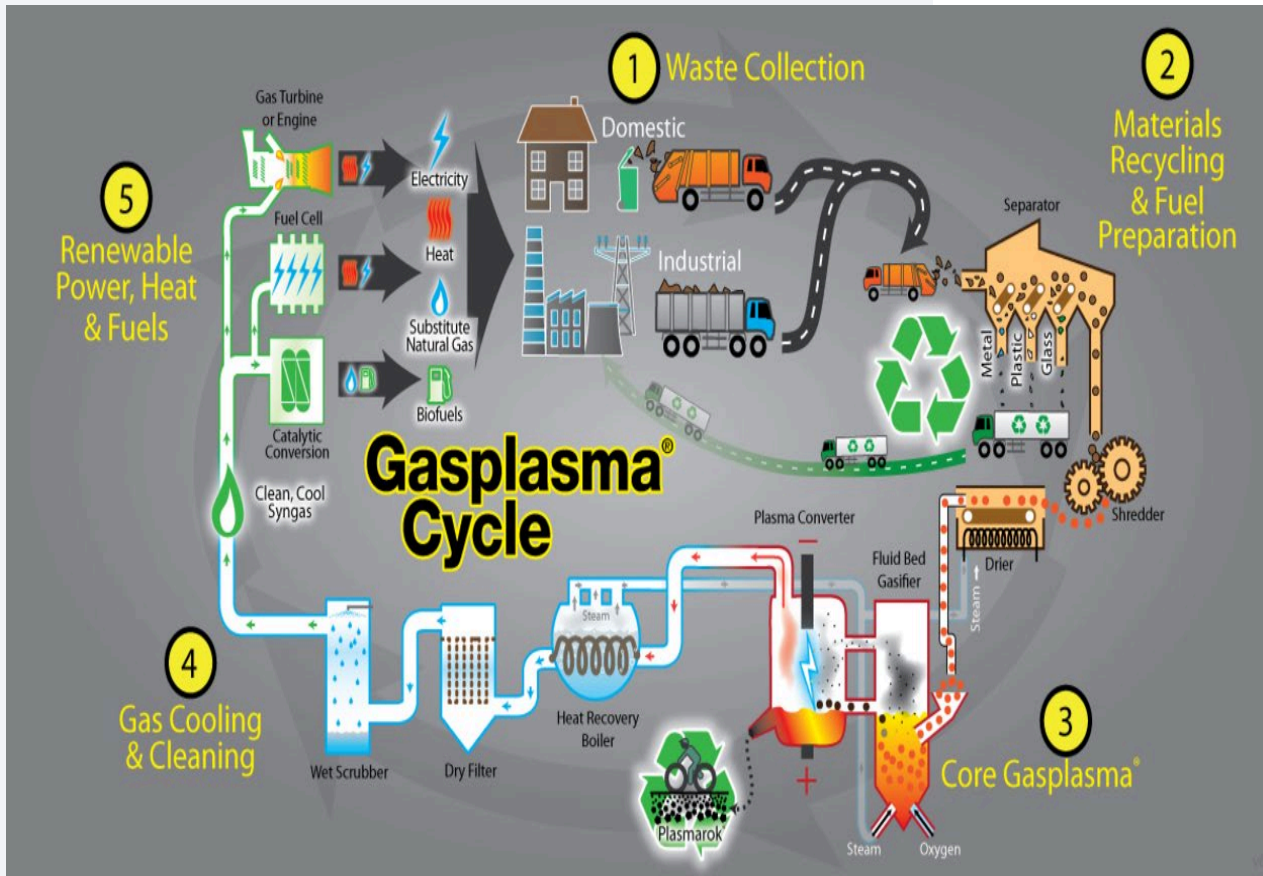
I hereby make a motion to elect Rachel Purcell as Chair and David Hackleman as Vice Chair.

C.R. Gilbert , Member

This memo functions as biased in the sense it does not represent the consensus of DSAC but hopefully instead serves as reasonable information for the committee's function to review additional information for a consensus of the subject matter if necessary.

PFAS

PLASMA GASIFICATION UPDATE



PLASMA TECHNOLOGY EFFECTIVELY DESTROYS PFAS

On August 23, 2024, Waste Today (Ref 1;) magazine reported that InEnTec Inc, Richland, Washington, has partnered with Terre Environmental LLC, North Charleston, South Carolina to destroy per-and polyfluoroalkyl substances (PFAS) using InEnTec's proprietary plasma processing technology. InEnTec says the results pave the way for commercial-scale remediation of these chemicals of concern at existing facilities.

InEnTec's Columbia Ridge's Model G100P PEM (Plasma Enhanced Melter) system is located at Waste Management's landfill near Arlington Oregon. Here it converts municipal solid waste, hazardous and medical waste streams into syngas for further production of renewable hydrogen.

ADVANTAGES AND DISADVANTAGES OF WASTE-TO ENERGY CONVERSION OF SANITARY SLUDGE FEEDSTOCK IN PLASMA GASIFICATION: (REF 2)

Advantages:

- **Waste Reduction:** Reduces sludge volume and landfill needs.
- **Energy Recovery:** Converts sludge into syngas for electricity, heat, or fuel.
- **Environmental Benefits:** Destroys harmful compounds and produces fewer emissions than incineration.
- **Minimal Residuals:** Leaves inert slag, which can be safely disposed of or reused.
- **Resource Recovery:** Allows for recovery of nutrients like phosphorus from slag.

Disadvantages:

- **High Costs:** Expensive to build and operate, with high energy demands.
- **Feedstock Pre-treatment:** Moisture in sludge reduces efficiency, requiring energy-intensive drying.
- **Complex Technology:** Requires skilled labor and consistent feedstock quality.
- **Limited Adoption:** Not widely used commercially, so long-term performance is uncertain.
- **Potential Emissions:** Small amounts of pollutants like CO₂ may still be released.

The EPA is actively working toward regulating PFAS emissions and has made significant progress through its *PFAS Strategic Roadmap*. As of 2024 (Ref 5), the agency has already proposed regulations for drinking water standards for key PFAS chemicals and has been tackling PFAS discharges from industrial sources. However, setting comprehensive standards for PFAS air emissions is still a work in progress.

Recently, several states, including North Carolina, New Mexico, and New Jersey, petitioned the EPA to add specific PFAS chemicals like PFOA, PFOS, PFNA, and GenX to the list of hazardous air pollutants (HAPs) under the Clean Air Act. This step would lead to stricter regulations for air emissions of these "forever chemicals," which have been linked to environmental contamination of water, soil, and air, posing health risks to communities (Ref 3, Ref 4)

While the EPA has not yet set official air emission standards for PFAS, this petition signals growing pressure and potential action within the near future(Ref 6)

The main purpose of this memo is a pathway forward to covert PFAS laden sludge into an economical and cost-effective conversion to green bio-fuel.

References;

Ref 1; [InEnTec says its plasma technology effectively destroys PFAS - Waste Today \(wastetodaymagazine.com\)](https://www.wastetodaymagazine.com/inentec-says-its-plasma-technology-effectively-destroys-pfas/)

Ref 2; [Plasma gasification of sewage sludge: Process development and energy optimization - ScienceDirect](https://www.sciencedirect.com/science/article/pii/S0950423023000000)

Ref 3; [Inside EPA's Roadmap on Regulating PFAS Chemicals - Earthjustice](https://www.earthjustice.org/newsroom/inside-epas-roadmap-on-regulating-pfas-chemicals)

Ref 4; [3 States Call on EPA to Regulate PFAS Air Emissions - EcoWatch](https://www.ecowatch.com/3-states-call-on-epa-to-regulate-pfas-air-emissions-1182221182.html)

Ref 5; <https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024>

Ref 6; [NC Dept. of Environmental Quality](https://www.nc.gov/ncdeq/)

Fire safety report from David Hackleman

20 September, 2024

Draft Letter to be considered by Benton County (Oregon) Disposal Site Advisory Committee composed by request of BCDSAC during meeting of 19 September, 2024. David Hackleman, author.

To: BCC (Benton County Commissioners)

Cc: BCDSAC (Benton County Disposal Site Advisory Committee
Ian McNab, Republic Representative, Republic Coffin Butte Landfill Site

Regarding: Republic Coffin Butte Landfill Site Fire safety and preparedness.

At the 11 September, 2024 meeting of BCDSAC, Mr. McNab and others provided a summary of the safety and preparedness which Republic representatives, colleagues, contractors and staff provide at the Coffin Butte Landfill site in Benton County, Oregon. In addition, officials from the Adair Rural Fire department responsible for this region in Benton County and members of the BCDSAC provided additional commentary.

Safety and preparedness summary: The effectiveness and preparedness varies per the following:

Condition One: During the hours of operation, the procedures and processes which Republic and its resources apply have demonstrated themselves as effective means to discover and resolve any and all fire incidents that have taken place within the confines of the Landfill site. Several such events have taken place during the operations based on commentary by Republic representatives, and none were mentioned as requiring fire department assistance.

Condition Two: During hours of closure, generally from 6PM through 6AM daily and on any and all holiday/closed days (the equivalent of at least 211 days a year), these procedures and processes are ineffective as they rely solely upon observation and action by employees of the operations. Hence fire safety and preparedness is based on external observers discovering an event and notifying the appropriate authorities, usually through a call to 911. The Adair Rural Fire Department has responded to extinguish observed significant, potentially calamitous fires that were identified by random public observers during hours of closure of the landfill operations. While such voluntary reporting of fires is greatly appreciated by all concerned, it is inadequate and inappropriate to rely upon such for a site known to have fire generation during normal operations and potential for fire emergence beyond such operations periods based on the nature of the operation and historical records.

Request to Commissioners: In light of these findings:

- it is recommended to pursue this inquiry regarding fire safety and in particular encourage the installation of continuous fire monitoring/alert systems which do not rely upon random public observers. (A suggestion of a system provided below.)

Suggestion: For the extent of the Coffin Butte Landfill and all adjacent properties owned, maintained, leased and/or utilized by the operations and subsidiary operations under the auspices of Republic, it is requested that a continuous fire detection and alert system¹ be implemented and approved by the Adair Rural Fire Department and the Benton County Oregon Fire Marshal.

¹ One example of an automated system for this purpose is available via the company Torch Systems (www.torchsystems.com). There are many other options, some include security and emissions monitoring and reporting. This system has not been vetted by BCDSAC.

**2023 Coffin Butte
Landfill Report –
Letter to BOC from
Ken Eklund**

October 1, 2024

Good day Commissioners:

The Disposal Site Advisory Committee has reviewed the 2023 Annual Report prepared for Coffin Butte Landfill (LAR) by Republic Services, both the original and updated versions, and heard testimony from the public about it; it was suggested to compile a list of relevant questions and comments, particularly concerning worker safety and contamination concerns; what follows is our list of recommendations for the report.

ISSUES

High arsenic levels in groundwater; arsenic monitoring.

The elevated levels that have consistently appeared in testing are a concern, especially since these elevated levels may indicate past or present incursions of leachate into the groundwater (there are indications that the landfill's leachate is high in arsenic). There are questions about the sufficiency of evidence for these elevated levels of arsenic being natural to this area. There are concerns that the most recent testing data hasn't been provided in this updated report.

Similar concerns were expressed about elevated manganese levels.

Methane releases.

The update to the LAR supplies information about the EPA inspection and subsequent investigation of the landfill, but much context is missing. There were questions about the efficiency of the landfill gas collection system. There were questions about the impact of alternative daily cover such as tarps on fugitive methane emissions. There were unanswered questions about how many repairs to gas containment infrastructure are being performed, per week for example. As data emerges about landfill fugitive methane emissions, how does Coffin Butte Landfill compare with other landfills in this regard?

EPA Inspection Clarity: the Commissioners may request clarification on the number of exceedances reported in EPA inspections and the context of these findings, such as how many surface samples were taken overall.

Methane flares and fire safety.

Oregon DEQ required the landfill to transition from open flares to an enclosed flare in 2023; there were questions about the timeliness of this transition, as a 2024 fire at the landfill was apparently caused by an open flare that was still operating. There were questions about the history of fires associated with the open flares. Committee members emphasized the need for clarity regarding the enclosed flare installation timeline, and raised concerns over a pre-enforcement letter received from Oregon DEQ indicating non-compliance, suggesting a full report and timeline should be requested by the Commissioners.

2024 data in the 2023 report.

There were questions about why an annual report for the year 2023 contains a significant amount of information from the year 2024, such as the entire discussion about the 2024 landfill expansion application. Suggestion was made to maintain focus on the specific reporting year.

Acknowledgement of extent of effort.

Committee members acknowledged the extensive work put into the LAR.

PROCESS RECOMMENDATION

It was suggested that the guidance document include specific recommendations for Republic to enhance their reporting and transparency practices.

Moved and seconded that we the Committee accept the report along with the amended, with guidance to the Commissioners summarized above; passed September 19, 2024.

PROCESS RECOMMENDATION

The LAR review process might be expedited if the Board of Commissioners established a list of subjects that are of perennial interest to the County, perhaps in the form of questions for the landfill operators to answer, and supplied this evergreen list to Republic but also to DSAC. DSAC could benefit from having such a list to hand as a guide to its annual review, to make sure that important issues are adequately addressed before the LAR comes before the Board. Republic could also benefit from having a baseline to operate from, so that questions important to Benton County do not go unaddressed in the report.

This subject/question list might also contribute to timely and appropriate action on issues. Currently, Republic releases data about operations as required, and publishes some of this data in the Annual Report, but there seems to be no process by which the data and the conversations it engenders continue from year to year or lead to action or follow-up. The Committee had no information about last year's review of the Landfill Annual Report, for example.

2022 Community Concerns Annual Report (Draft)

2022 Coffin Butte Landfill Community Member Concerns Annual Report

Prepared By:

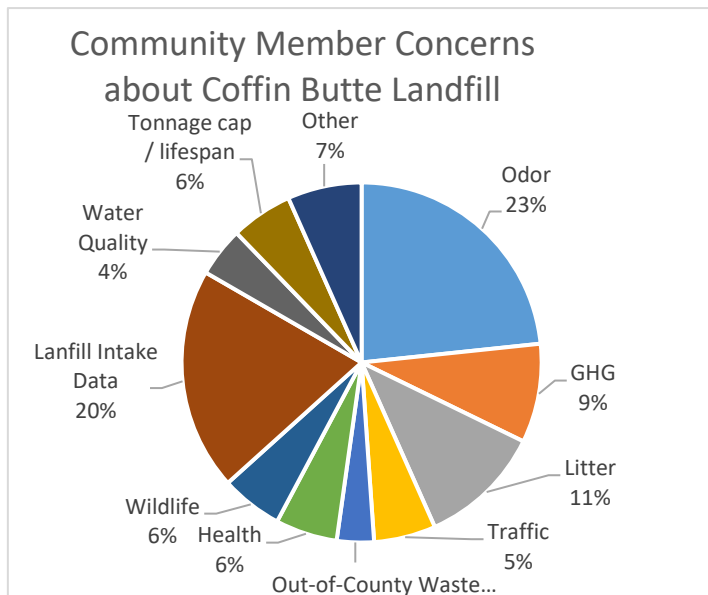
Preparation Date: August 13, 2024

The duties of Benton County’s Disposal Site Advisory Committee (DSAC) are outlined in Oregon state law—specifically in ORS 459.325, which includes the requirement that “the committee shall prepare an annual written report summarizing the local citizens’ concerns and the manner in which the owner or operator is addressing those concerns” which will be considered by the Department of Environmental Quality as part of issuing and renewing a solid waste permit.

Benton County staff and the DSAC have prepared this staff report summarizing community member concerns regarding Coffin Butte Landfill in 2022, which may be used by DSAC to meet the requirements of ORS 459.325. Concerns listed in this report have been compiled using information from the Coffin Butte Landfill & Pacific Region Compost Annual Report 2022, complaints received by Benton County staff, complaints received by the Oregon Department of Environmental Quality and concerns presented during Benton County Disposal Site Advisory Committee and Solid Waste Advisory Council meetings.

Sixty-four complaints about the Coffin Butte Landfill were reported in 2022 as detailed in Table 1 and Table 2. Some complaints included numerous topics while others focused on a single concern. The complaints were organized into themes as illustrated in the following chart.

The number of complaints in 2021 and 2022 was significantly higher than in previous years. One explanation for this is that Republic Services submitted a conditional use permit to expand the landfill in 2021 which was eventually withdrawn in March 2022. This elicited a lot of public feedback and may have led to more complaints. Another reason that there may have been more complaints is that Benton County began a community engagement process called [Benton County Talks Trash](#). This endeavor spanned from 9/8/22 through 4/10/23 and included 11 public workgroup meetings and 86 subcommittee meetings. This process welcomed community input, some of which were complaints about the landfill.



The Oregon DEQ notified Republic Services of 20 complaints which have been integrated into Table 1.

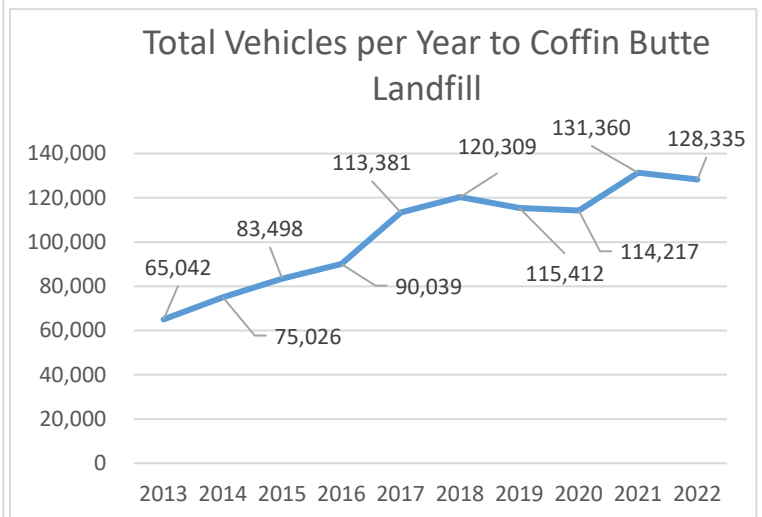


Table 1: Coffin Butte Landfill Community Concern Log 2022					
#	Date	Concern Summary	Received By	Compliant / Concern Communication Method	Manner in which the landfill is addressing those concerns
1	1/24/2022	The toxic odor coming from the Coffin Butte Landfill managed by Republic Services is overwhelming on my property today. It causes stomach upset and lightheadedness if outside for more than a few minutes.	DEQ	Reported on DEQ's online complaint form	enhanced inspection planned
2	1/24/2022	Odors and gasses move into our region regularly..	DEQ	Reported on DEQ's online complaint form	1/25 (SG) - this is a permitted facility rerouting complaint.enhanced inspection planned
3	1/25/2022	Went outside to work in the garden around noon - odor was so disgusting that I came inside as soon as my work was done. This was especially annoying as I had much to do outside and it was a beautiful day.	DEQ	Reported on DEQ's online complaint form	1/27 (SGallino) - received this complaint from Wilson Wade. Reassigned to Karen White-Fallon.enhanced inspection planned
4	1/25/2022	Late morning worked outside under terrible odors and air quality that seemed unhealthy. After lunch could no longer put off walking the dogs and walked in the awful stench. I ran into a neighbor also out walking who wondered if we were doing more harm than good to our health breathing what seems like toxic air.	DEQ	Reported on DEQ's online complaint form	1/27 (SGallino) - received this complaint from Wilson Wade. Reassigned to Karen White-Fallon.enhanced inspection planned
5	1/25/2022	Several times each week our family drives hwy 99 Independence Hwy and hwy 20 from our Soap Creek Valley home in Benton Co. These roadways' ditches are filled with trash and fields along these routes have plastic and other garbage that has blown into them. These are routes to the Coffin Butte Landfill. The trash is never-ending and is an environmental hazard to wildlife and waterways. It is embarrassing that this continues to happen here; who is responsible for dealing with this?	DEQ	Reported on DEQ's online complaint form	enhanced inspection planned.

6	1/26/2022	Concerns about landfill tonnage cap, lifespan, and revenue	DSAC Meeting	Meeting, and written comment	Unknown
7	1/26/2022	Greenhouse gasses Debris escaping trucks and littering the roadway	DSAC Meeting	Meeting	Unknown
8	1/26/2022	Landfill accepting out-of-county waste	SWAC Meeting	Meeting	Benton County has no authority to limit out-of-county waste per a Supreme Court decision.
9	1/26/2022	Air quality impacts from landfill cover	SWAC Meeting	Meeting	Unknown
10	1/26/2022	Unknown volume/types of hazardous materials accepted at the landfill;	SWAC Meeting	Meeting	Unknown
11	1/28/2022	Landfill fumes once again effecting air quality. It is happening way more frequently to 2-3 a week. It's disgusting and impacts daily quality of life at home and inside the home	DEQ	Reported on DEQ's online complaint form	enhanced inspection planned
12	1/31/2022	Garbage trucks releasing roadside Litter and debris - Hwy 99; Acceptance of out-of-county waste; Traffic near landfill; Odors from landfill and PRC;	Benton County	Phone	Benton County provided odor complaint resources
13	1/31/2022	Commerial trucks losing material on the way to the landfill creating truck traffic Odors from landfill and PRC	North Albany	Email	Benton County provided odor complaint resources. Resident was encouraged to provide public testimony.
14	2/8/2022	It appears that some vehicle approaching or departing the Coffin Butte landfill spilled a portion of an unsecured load leaving me to dodge broken chunks of plastic and a coil of metal scrap	DEQ	Reported on DEQ's online complaint form	This was a drive by complaint from someone who does not live near the landfill. Additionally based upon the information provided it would not be possible to determine if the

					trash observed was from a private vehicle or from the landfill trucks.
15	2/8/2022	Same old problem as fog or low clouds lift in mid-day it draws a hideous cloud of noxious odor to our house	DEQ	Reported on DEQ's online complaint form	enhanced inspection planned
16	2/15/2022	Drove into Corvallis today and looked at trash along the roadside of Hwy99 from the landfill at Coffin Butte Road all the way to (Hospital) Elks Drive. Looked at more trash on the way home. Appears to be more trash on the East side of Hwy99. Probably due to number of vehicles heading to the landfill. Welcome to Benton County!	DEQ	Reported on DEQ's online complaint form	Not reported
17	2/23/2022	Request for third-party audit of materials accepted at the landfill	SWAC Meeting	Meeting	Unknown
18	2/23/2022	Covanta plant ash used as ADC, health/safety, landfill gas monitoring	SWAC Meeting	Written comment	Republic Services provided a presentation about Covanta Ash at the 4/27/22 DSAC meeting.
19	3/23/2022	Concerns the landfill causes nearby residents cancer. (Written comment)	SWAC Meeting	Written comment	Unknown
20	4/27/2022	Concern about landfill methane emissions	DSAC Meeting	Written comment	Unknown
21	4/27/2022	Concern about landfill-related traffic	DSAC Meeting	Written comment	Unknown
22	5/25/2022	Concern landfill is approaching maximum annual tonnage allowed	SWAC Meeting	Written comment	Unknown
23	6/1/2022	Odor shows up typically on beautiful fair weather days like today. Often it starts in mid-morning when any light clouds or other moisture in the air begins to lift as the day warms. Then sticks around most of the day until nightfall.	DEQ	Reported on DEQ's online complaint form	Not reported

2 4	6/16/20 22	<p>on 6/14/2022 the property owner Zachary Zeek for 775 Gerth Ave NW was notified the results of a re-inspection of a recent cleanup by Bill Goff Construction. In May of 2022 The site had a preexisting LUST number 27-04-2434. Bill Goff Construction removed a previous decommissioned 240-gallon underground heating oil tank. Goff Construction then collected worst case assessment soil samples from beneath the tank measurements indicated 3450 ppm diesel was present. Goff Construction removed 4.63 tons of impacted soil which was transported to Coffin Butte Landfill for disposal. Goff Construction subsequently collected cleanup confirmation soil samples from the tank cleanup excavation. Four soil samples were collected at a depth of 90 to 92 inches on each of the sides of the excavation. The reported results of Bill Goff Construction soil samples were three not detected for diesel and one soil sample had 231 ppm diesel. The tank which was located on the south side of the house lay in a flowerbed between the concrete walkway and the house. The excavation surface exposure was only three feet wide between the sidewalk and the house. They reportedly dug out the tank and the contaminated soil with five gallon buckets by hand without shoring. The tank was approximately 3 ft in diameter and 4 feet long. Bill Goff Construction sent the owner a certification letter for the property transaction stating the property meet DEQ Soil Matrix Standards. And a bill for \$8790 saying the project is complete. My Inspection The subsurface soil boring was completed with AMS Power Probe and GeoProbe Dual tube 2.5 inch sampler. Soil core samples were collected in 5 feet increments. The total depth of the boring was 25 feet. Groundwater bearing zone at the property was at 23 feet. After a subsurface inspection on 6/14/22 soil samples revealed that the tank had leaked and contamination remained in the excavation on the south side after reported to all removed by Bill Goff Construction. Heavy contamination was visible at 5 feet and 7.5 ft (91 inches). Soil contamination appeared to have cleaned up 14 feet depth on the south side of the excavation. The groundwater sample appeared to be clean. This site appears to have larger footprint of heating oil contamination than reported by Bill Goff Construction. The question of this complaint comes my suspicions of Bill Goff's work it appears that every heating oil cleanup he submits in the last 6 years is a Soil Matrix Cleanup every one! In 2020 i re investigated a heating oil tank cleanup at 950 SW Levens in Dallas Oregon DEQ file 27-17-0915 which Erik Anderson of Anderson Geological. Our conclusion was that Bill Goff's Soil Matrix cleanup closure certification was grossly mistaken and inaccurate. Soil samples I obtained will be going to the laboratory today</p>	DEQ	Reported on DEQ's online complaint form	Had multiple conversations with Bill Goff and Karl Van Zandt. Completing extra review of a number of projects. Bill Goff came back to site and corrected errors at this site.
2 5	7/1/202 2	The usual stench from the landfill. Once again occurring at my location as the marine clouds lift and the day warms.	DEQ	Reported on DEQ's online complaint form	I contacted the facility and told them to add the complaint to their complaint log and to perform an odor investigation.

26	7/11/2022	Coffin Butte Landfill not accepting cash	Benton County	Phone	Benton County notified Republic Services, requested further investigation
27	7/11/2022	Coffin Butte Landfill not accepting cash, after passing of SB 1565	Benton County	Phone	Referred to Republic Services
28	7/26/2022	Odors from Coffin Butte Landfill. Quite noticeable in the morning while we had a high pressure system and no wind.	DEQ	Reported on DEQ's online complaint form	I contacted the facility and told them to add the complaint to their complaint log and to perform an odor investigation.
29	7/27/2022	Concern about details of collected and shared data associated with the landfill and PRC in annual reports: Accuracy of waste county-of-origin data, C&D data is not separately reported/recorded for all vehicle types at the landfill, too little detail for vehicle data, leachate hauling data, and gravel truck hauling data (written comment, also presented at 8/24/23 DSAC meeting).	DSAC Meeting	Meeting, and written comment	Unknown
30	7/27/2022	Concern about landfill impacts on nearby heron rookery.	DSAC Meeting	Meeting	Unknown
31	7/27/2022	Concern about landfill annual report data - tonnage accuracy.	DSAC Meeting	Meeting	Unknown
32	7/27/2022	Concern about high arsenic levels reported in monitoring wells in the landfill annual report.	DSAC Meeting	Meeting	Unknown
33	7/27/2022	Concern about landfill annual report data - PRC runoff not included.	DSAC Meeting	Meeting	Unknown
34	7/30/2022	Coffin Butte Landfill by Republic	DEQ	Reported on DEQ's online complaint form	I contacted the facility and told them to add the complaint to their complaint log and to do an odor investigation. I emailed the complainant and let them know that I had contacted the facility regarding the complaint.

3 5	8/15/20 22	The Coffin Butte dump smell is noticeable on occasion. Today it is really bad. To the point of making me sick to my stomach when I walk around outside.	DEQ	Reported on DEQ's online complaint form	I sent a message to the landfill and told them to add the complaint to the complaint log and asked them to do an investigation and to report back their findings. I also called and talked to the complainant on 8/17/2022 and said I had contacted the landfill. I asked if it could be the composting facility and was told no it smelled like the landfill not compost. The complainant will let us know if it is an issue again.
3 6	8/24/20 22	Concern landfill is approaching maximum annual tonnage allowed, concern DEQ solid waste disposal reports filed by Coffin Butte Landfill are shorter than previous years (written comment).	DSAC Meeting	Written comment	Unknown
3 7	8/24/20 22	Concern landfill impacts on nearby heron rookery.	DSAC Meeting	Meeting	Unknown
3 8	8/24/20 22	Concern about landfill methane emissions.	DSAC Meeting	Meeting	Unknown
3 9	8/24/20 22	Concern that reported landfill capacity is not accurate.	DSAC Meeting	Meeting	Unknown
4 0	8/24/20 22	Concern about landfill methane emissions.	DSAC Meeting	Meeting	Unknown
4 1	8/24/20 22	Concern about materials accepted at the landfill, recommending a characterization of accepted materials.	DSAC Meeting	Meeting	Unknown

4 2	10/6/20 22	Concern about hazardous materials accepted at landfill via commercial waste collection, concern about hurdles and inaction in complaint process (written comment, duplicate of email complaint received by Benton County)	Benton County	Email	Complainant filed complaints with DEQ, DEQ responded during BCTT process
4 3	10/6/20 22	Hazardous materials accepted in garbage collection from commercial facilities	Benton County	Phone	Unknown
4 4	10/7/20 22	We typically smell the odor from the landfill on days when there is no wind and it is very still	DEQ	Reported on DEQ's online complaint form	Not reported
4 5	10/26/2 022	Concerns about landfill closure date, fill rate, capacity, environmental cost of the landfill (including methane, PFAS, leachate, landfill gas emissions, air quality, wildlife impacts, traffic impacts, visual impacts, dust and litter, land use impacts, liner/cover maintenance, public security), regulatory and general compliance (federal, state, and local), material acceptance monitoring, material sources, accepted tonnage/intake rate, liability for remediation, quarry excavation, closure and reclamation plans, risks (fire, earthquakes, hazardous materials, PFAS, flood, power outages, multiple disasters, groundwater contamination, economic impacts	SWAC & DSAC Joint Work Session	Written comment	Unknown
4 6	10/26/2 022	Concern landfill impacts on nearby heron rookery (written comment)	SWAC & DSAC Joint Work Session	Written comment	Unknown
4 7	10/26/2 022	Concern about amount of recyclable materials in the landfill (written comment)	SWAC & DSAC Joint Work Session	Written comment	Unknown
4 8	10/26/2 022	Concern about landfill material characterization, and methane containment	SWAC & DSAC Joint Work Session	Written comment	Unknown
4 9	10/26/2 022	Concern about level of detail in landfill traffic reporting	SWAC & DSAC Joint Work Session	Written comment	Unknown
5 0	11/16/2 022	This was a typical Coffin Butte landfill odor event at my home: a beautiful sunny cool morning which starts with a low-hanging fog sucking landfill odors south through the Soap Creek Valley. By midday the odors dissipate.	DEQ	Reported on DEQ's online complaint form	Not reported
5 1	12/7/20 22	Concerns about rate of quarry excavation and impacts to available landfill airspace	SWAC & DSAC Joint Work Session	Meeting	Unknown

5 2	12/7/20 22	Concern about various landfill business contracts/agreements increasing accepted tonnage and impacting landfill lifespan (in meeting and via written comment)	SWAC & DSAC Joint Work Session	Meeting, and written comment	Unknown
5 3	12/7/20 22	Concern about landfill compliance with land use conditions of approval	SWAC & DSAC Joint Work Session	Meeting	Unknown
5 4	12/9/20 22	Republic Services truck releasing roadside Litter and debris - Camp Adair Road	Benton County	Email	Benton County notified Republic Services, requested further investigation
5 5	12/9/20 22	Republic truck releasing trash along Camp Adair Road	Benton County	Email	Sent the complaint details to Republic Services, asking for investigation and follow up for resolution, in order to prevent this from reoccurring.

5 6	12/12/2 022	Frequent odors surrounding neighborhood and beyond from Coffin Butte landfill- emissions gas unsafe air quality and it is happening more and more frequent- weekly if not daily at times . Absolutely unacceptable. We are becoming the new armpit of Oregon. So sad.	DEQ	Reported on DEQ's online complaint form	Since the complaint report does not provide additional information regarding the date time or location that is difficult to track detail for the incident. According to representative of the landfill the landfill conducts regular drives through the areas surrounding Coffin Butte and haven't detected offsite odors. Their LFG collection system have been running as designed as well. The landfill hasn't started taking any new waste streams recently that would cause odors.
5 7	12/17/2 022	driving home experience very strong smell upon entering the Soap Creek Valley.Odor too offensive for outdoor activities	DEQ	Reported on DEQ's online complaint form	Not reported
5 8	12/18/2 022	The (sadly) typical disgusting odor of Coffin Butte Landfill. See comments above about atmospheric conditions. The smelly air tends to concentrate in different strata of the atmosphere depending on the weather. Yesterday was a strong inversion and the odor was most concentrated at around 500-900 ft elevation.	DEQ	Reported on DEQ's online complaint form	Not reported

59	9/2022-4/2023	The "Benton County Talks Trash" Solid waste workgroup process, taking place from 9/2022-4/23, included many concerns ranging in topics. Major discussion categories included solid waste planning, landfill size/capacity/longevity, legal and land use issues, compliance with past land use conditions, and community outreach. Full report with detailed concerns can be found here: https://www.co.benton.or.us/sites/default/files/fileattachments/community_development/page/8208/bctt_final_report_4-11-2023.pdf	Benton County Talks Trash Solid waste workgroup process	Meetings, written comments	Benton County began Sustainable Materials Management Plan development process
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Table 2: Concerns received by Coffin Butte Landfill (table sourced from Coffin Butte Landfill and Pacific Region Compost Annual Report 2022).

Note that the 25 complaints noted in February in the chart to the left have been included in the table above. Five of these were in 2023 and therefore not included in this report.

Month	2015	2016	2017	2018	2019	2020	2021	2022
January	1	2	0	0	0	0	0	0
February	0	0	0	0	0	2	0	25*
March	0	0	0	0	0	0	0	0
April	1	0	0	0	1	1	0	0
May	0	0	0	0	0	0	0	0
June	0	0	0	0	0	0	0	0
July	0	0	0	0	0	0	0	0
August	0	0	0	0	0	0	0	4**
September	0	0	0	0	0	0	1	0
October	0	0	0	0	0	1	0	0
November	0	0	0	0	0	0	1	0
December	0	0	0	0	0	0	1	1***

*DEQ sent single notification of 25 complaints received between 11/8/21 and 2/7/22
 **DEQ sent single notification of 4 odor complaints received from 7/1/22 to 8/16/22
 ***DEQ sent notification of 1 odor complaint they received on 12/13/22

Answers to questions
for Republic Services
raised at last meeting

2024.09.19 DSAC Meeting - Questions for Republic Services

2024.09.19 DSAC Meeting - Questions for Republic Services

1. Why was an industrial hygienist hired only after a 2024 OSHA inspection and worker strike, and has the assessment been completed?

The industrial hygienist was hired by Republic Services out of an abundance of caution and a desire to be responsive to community concerns. Coffin Butte landfill already has robust worker safety procedures in place. OSHA's inspections found violations that included a slip and fall hazard and an improperly chained canister to the wall. The agency monitored employee's exposure to air pollutants, but those tests were not conclusive, and the agency opted not to conduct another round of tests. In order to ensure that employees are and remain safe, Coffin Butte hired the third-party consultant. Those tests have been completed, but the results are not yet finalized. They will be available in the coming weeks.

2. What are the safety measures in place for workers exposed to dust and contamination at the landfill?

Coffin Butte Landfill provides monthly OSHA training to its employees, as well as extensive PPE that includes vests, jackets, coveralls, safety glasses, face shields, hard hats and puncture resistant gloves. Respirators are also available upon request. The Landfill also provides work clothing to include rain gear, as well as an annual boot allowance and prescription safety glasses as needed.

3. Concerns about vehicles being washed without proper containment, leading to contamination of local waterways.

Our standard operating procedure is to wash equipment "inside a cell" at Coffin Butte. This allows us to contain any water in the cell, where it becomes part of the leachate that is hauled off-site and processed. We were notified by OSHA that it had received a claim that Republic was allowing washing of equipment outside the cell area. We investigated and found that technicians were washing off equipment outside the Maintenance Shop that was outside the cell area. We took this claim seriously and as soon as we were made aware of the possibility of contamination, we removed about 12 inches of topsoil and put it in a lined landfill cell. US Ecology tested the remaining soil and found no contamination. We reminded employees of our standard operating procedures and provided additional training to ensure this does not occur again.

4. Questioned the lack of visual screening along Highway 99, required in the existing conditional use permit.

This issue was debated extensively during the Benton County Trash Process. Details can be found in Appendix C4 of the Benton County Talks Trash Report.

5. Raised concerns about delayed implementation of stormwater management projects.

Our stormwater management projects are voluntary, and we conduct work on them each year.

6. Requested any available reports addressing these costs.

There are no publicly available reports on this issue.

7. Raised concerns about hazardous waste being deposited at the landfill, specifically incinerator ash from Marion County, and its potential environmental impacts.

The incinerator ash referenced is heated to extremely high temperatures, which destroys potential contaminants. It is then saturated with water and comes to us in what can best be described in a wet cement-like form. It's thick and heavy, and we layer it on top of the waste placed in the cell each evening, much like layering a lasagna. If it does dry, it hardens into a concrete form. So, it doesn't fly away, nor is it carried by winds or breezes. Coffin Butte is only allowed to use this daily cover material after it is approved by DEQ after a significant amount of testing and review. That process takes almost 18 months.

8. Kevin Kenaga inquired about the testing procedure at the landfill flares:

a. What is being tested? Flare emissions to ensure they meet state and federal requirements.

b. When will the testing be available to the public? It'll be submitted to as a formal report to DEQ after testing is completed so it'll be public.

c. Response from Republic Services: Testing is scheduled for October 22. It is a standard procedure for flare or industrial devices to have initial source testing.

9. Kevin Kenaga raised concerns about the daily cover at the landfill. The 2023 Coffin Butte Annual Report mentions daily cover (typically 6 inches of soil), but in reality, mesh netting is used, which doesn't prevent odors or wildlife from accessing the garbage. Kevin criticized the accuracy of the report and emphasized the environmental impact of not using adequate daily cover, including increased methane emissions.

The alternate daily cover has been approved by DEQ as noted above. In addition, we also employ a heavy-duty 200x200 foot tarp.

Proposal for Fire Safety Report

- David Hackleman volunteered to draft a report summarizing fire safety concerns, incorporating feedback from the previous meeting.
- Committee Agreement:
 - Members agreed to provide comments directly to David.
 - David will reach out to Republic Services for additional information as necessary.
 - The draft report will be reviewed at the next meeting before submission to the Board of Commissioners.

Question for Benton County:

1. Raised the question of the costs to Benton County for hosting the landfill, including:

- a. Road degradation: A traffic impact study or assessment (TIA) is required with the land use application to capture the existing conditions of the road(s) and potential impact with expansion. These are to be conducted by a transportation engineer.

Public Works should have a Pavement Condition Index (PCI) report. It's been requested. The PCI rates the condition of the surface of a road network by providing a numerical rating for the condition of road segments within the road network, where 0 is the worst possible condition and 100 is the best. It measures two conditions:

- The type, extent and severity of pavement surface distresses (typically cracks and rutting)
- The smoothness and ride comfort of the road

- b. Decrease in land values near the landfill. Costs, however, are not land use criterion. The County does not have vicinity specific cost data.

- c. Post-closure costs. Republic Services (Valley Landfills) is required to manage the site for 30 years, post-closure.

2. Also questioned whether ENRAC accepts public comment, as there is confusion about the public's ability to provide input at their meetings. The ENRAC does not take public comment and the public is encouraged to submit input to the Planning Commission, but not until the public comment period has opened after the application has been deemed complete.
3. A community member commented on difficulties finding DSAC-related information online, which used to be easily accessible. Requested more detailed and accessible information on the committee's webpage. A link to the DSAC website (which has meeting information) is being added to the front page of the solid waste/recycling website to make it easier to find. We are also working with the new Public Information Officer to better promote the meetings. An email was sent to the Benton County Talks Trash list, advertised in the Gazette-Times and Corvallis Advocate and promoted on social media.

October 1, 2024

Good day Commissioners:

The Disposal Site Advisory Committee has reviewed the 2023 Annual Report prepared for Coffin Butte Landfill (LAR) by Republic Services, both the original and updated versions, and heard testimony from the public about it; it was suggested to compile a list of relevant questions and comments, particularly concerning worker safety and contamination concerns; what follows is our list of recommendations for the report.

ISSUES

High arsenic levels in groundwater; arsenic monitoring.

The elevated levels that have consistently appeared in testing are a concern, especially since these elevated levels may indicate past or present incursions of leachate into the groundwater (there are indications that the landfill's leachate is high in arsenic). There are questions about the sufficiency of evidence for these elevated levels of arsenic being natural to this area. There are concerns that the most recent testing data hasn't been provided in this updated report.

Similar concerns were expressed about elevated manganese levels.

Methane releases.

The update to the LAR supplies information about the EPA inspection and subsequent investigation of the landfill, but much context is missing. There were questions about the efficiency of the landfill gas collection system. There were questions about the impact of alternative daily cover such as tarps on fugitive methane emissions. There were unanswered questions about how many repairs to gas containment infrastructure are being performed, per week for example. As data emerges about landfill fugitive methane emissions, how does Coffin Butte Landfill compare with other landfills in this regard?

EPA Inspection Clarity: the Commissioners may request clarification on the number of exceedances reported in EPA inspections and the context of these findings, such as how many surface samples were taken overall.

Methane flares and fire safety.

Oregon DEQ required the landfill to transition from open flares to an enclosed flare in 2023; there were questions about the timeliness of this transition, as a 2024 fire at the landfill was apparently caused by an open flare that was still operating. There were questions about the history of fires associated with the open flares. Committee members emphasized the need for clarity regarding the enclosed flare installation timeline, and raised concerns over a pre-enforcement letter received from Oregon DEQ indicating non-compliance, suggesting a full report and timeline should be requested by the Commissioners.

2024 data in the 2023 report.

There were questions about why an annual report for the year 2023 contains a significant amount of information from the year 2024, such as the entire discussion about the 2024 landfill expansion application. Suggestion was made to maintain focus on the specific reporting year.

Community concerns received since last meeting

From Michael Schuyler on 9/17: I read Ken Eklund's letter to the GT editor today, asking for input. I have some.

Sometime this past year I listened to a talk offered by the Academy for Lifelong Learning that was mainly a discussion by a fellow from a European country (Germany or Netherlands or...?) covering the way European countries are replacing landfills to an amazing extent with diverse recycling and treatment methods. It was eye-opening, to say the least. The basic story was that landfills there are nearly entirely being replaced by extensive Green approaches.

I attended last month's talk at the Corvallis Community Center that focused on our own landfill expansion, which I already knew was driven by financial gains for Republic Services, seemingly favored by the county supervisors because of the income the county realizes when Republic pays to handle one-third of Oregon's untreated waste in Coffin Butte.

I am a chemist, retired from OSU Chem Dept., and I understand the role methane has on our planet's atmosphere. Landfills are said to contribute about a third of the methane emissions into the atmosphere in the US. Expanding our landfill will accelerate this, looking away from the problem. I learned at the talk that should Benton County refuse to permit the expansion, which mainly serves citizens outside our county, would provide a serious encouragement to find another way...and it would NOT mean we in Corvallis would have to find immediately another way to dispose of our trash without recourse.

After listening to the way Europe is directing its citizen to take a role in separating recyclables and treating trash, I want to encourage all of us to take part in that. In fact, during the evening talk, the "Toxics..." fellow from Eugene claimed that Eugene is moving in that direction (extensive separation and thermal treatment of some part of the leftovers).

Turn down the expansion (I have a yard sign!).

Michael Schuyler

Dear DSAC Committee,

Please include my concerns in the yearly report for the Oregon DEQ. I am not available to attend the meeting this evening, Thursday, September 19, in person, but wish for my concerns to be included.

Virginia Scott

Benton County Resident

Methane, Lithium Batteries, Landfill Fires and Their Cost

Methane is a potent greenhouse gas that has more than 80 times the warming power of carbon dioxide over the first 20 years after it reaches the atmosphere. – Environmental Defense Fund

Greenhouse gasses contribute to global warming.

Oregon is attempting to decrease its greenhouse gasses, yet we are not moving to eliminate or even reduce the massive methane emissions being released by Coffin Butte. As reported in Ken Eklund's letter to the Board of Commission's on August 5, 2024, "As the Commissioners are aware, the EPA "opened a file" on Coffin Butte Landfill after local concerns led to an inspection in June 2022 that revealed violations. Senator Jeff Merkley: "The inspection resulted in recording 61 leaks, including three measurements that maxed out the instrumentation that was being used, at 70,000 parts per million." Methane at these concentrations is at the ignitable level: a spark will cause it to explode into flame. That enforcement action is still ongoing."

The Federal grants that Oregon is currently applying to Electric Vehicles in order to reduce our CO2 emissions will not counter the negative effects of methane emissions, with their potent climate changing effect, on our state and the world.

The Governor has invoked the Emergency Conflagration Act and Oregon is in a state of emergency due to the current wildfires. These wildfires are exacerbated by the dry environment that is a result of global warming. Oregon is calling on its mutual assistance teams around the country to help us with fighting these wildfires. As we know the cost of firefighting and recovery from wildfires is massive and costs lives, like the recent death of single-engine air tanker pilot James Bailey Maxwell.

In addition Oregon Health Authority is reporting record numbers of heat related deaths due to climate change, including 14 since July 5 this year. The Climate and Health in Oregon report for 2023 reminds us that extreme climate effects continue and that we must build resilience against wildfire, drought and extreme heat. It seems that reducing methane release would be more effective than building resilience to the effects of methane releases.

This methane release is causing losses in human life, environmental losses, fire losses and expenses, and these are not limited to our county. These effects are cumulative across our state, our neighbor states and have worldwide implications that often fall on those least able to adapt to them.

Coffin Butte catches fire regularly, which consumes firefighting resources that could be used to protect our residents. For example, OPB reported that on July 24, firefighters responded to a grass fire near a flare stack that burns off methane gas from the landfill. There are also frequent equipment fires at the landfill often caused when trash gets inside the engine compartments on the D9 dozers and packs around the turbos then starts to smolder. Now combine this proclivity to catch on fire with the explosive levels of methane detected in leaks across the landfill property. What happens if one of the 2000 lightning strikes that Oregon just experienced between Wednesday July 17 and Sunday July 21 randomly hit a particularly explosive methane release? On September 6, 2024 there were 8 lightning strikes one and adjacent to the landfill property. These fires endanger the life and safety of our firefighters, and are likely to blow embers and toxic plumes into residential neighborhoods. Embers are the leading fire ignition source in a fire. They can travel on the wind up to five miles in front of a fire. **A five mile radius from Coffin Butte encompasses the entire Soap Creek Valley, Adair Village, Lewisburg, Vineyard Mountain, parts of North Albany, Tampico, and our Polk County neighbors up past the Suver cross roads as well as the commercial OSU McDonald and Starker forestlands.**

OPB reported in October of 2023 on the growing risk of lithium battery fires in Oregon landfills. Lithium battery fires are particularly dangerous. If damaged, or if their contacts touch metal, they are particularly susceptible to thermal runaway. Lithium batteries can burn without oxygen because they create their own oxygen. The fire that they produce is considered a chemical fire and produces highly toxic fumes. They burn at temperatures in excess of 932 degrees F which can easily ignite surrounding material. They are exceptionally difficult to extinguish. What is Republic's plan to address this ever growing issue?

In addition to all of the risks above, is the risk of fire along what should be the safest emergency fire exit route for the nearly 200 households of the Soap Creek Valley. What happens if a Coffin Butte fire ignites the Soap Creek Valley and then, what should be the safest exit route for its residents is blocked by flames and toxic fumes from a landfill fire?

Monitoring of methane must be automated, constant (not pre scheduled and a few times per year), and independent of Republic Services. The penalty for failing to address these methane leaks needs to be commensurate with the actual costs to health, life, livelihood, global warming, fire, firefighting, recovery, etc., and must be sufficiently high to actually produce remediation.

Virginia Scott

Supporting Research Notes:

Methane is capable of being ignited by relatively small sparks from shorted wires, static discharge or electric motor operation. From Washington Edu

A lightning strike at a recycling plant in Oxford caused a huge gas explosion and local power outages. Oct 2, 2023 – The Guardian

METHANE GAS DETECTION AND COLLECTION. Landfill gas emissions can be a hazard to the environment and to the health of residents surrounding landfill sites. Methane gas, a flammable gas, can present a fire hazard. Federal regulations require all MSW landfill operators to monitor the emission of methane on a quarterly basis. If methane levels in or around the land-fill become explosive, the landfill operator must take immediate steps to mitigate the danger. The operator must also implement a remediation program to prevent future explosive buildups. - From FEMA Landfill Fires document

Exploding lithium batteries are causing fires in Oregon's landfills By [Joni Auden Land](#) (OPB) Oct. 21, 2023 6 a.m. - <https://www.opb.org/article/2023/10/21/exploding-lithium-batteries-landfill-fires/>

Landfill fire in Yakima is one step closer to being put out -By Courtney Flatt (Northwest News Network) - July 7, 2023 5 a.m. - <https://www.opb.org/article/2023/07/07/landfill-fire-in-yakima-is-one-step-closer-to-being-put-out/>

OEM Public Affairs Report from August 1, 2024:

FOR IMMEDIATE RELEASE

Media contact: ECC.jointinfo@oem.oregon.gov or call 503-934-3310

Salem, Ore – The impact of this year's wildfire season continues to reverberate throughout the state as the number of acres burned reaches 1.2 million.

At this time, the number of acres burned is four times the average when compared to the same point in past seasons. As many as 1,261 fires have burned across the state with more than 100 still active.

Five megafires, fires that exceed 100,000 acres, are still burning in Eastern Oregon: The Battle Mountain Complex, Lone Rock, Durkee, Cow Valley and Falls fires. These megafires are now between 19% and 99% contained.

Residents in these communities have been deeply affected by the wildfires. As many as 18,000 residents were under a level 1, 2 or 3 evacuation level during the height of the response to date with more than 8,000 still under some type of evacuation warning.

The full scale of the loss will not be clear for a few months at least. Initial reports show that dozens of people have been injured, and there was at least one wildfire-related death. An air tanker pilot named James Bailey Maxwell, 74, who died in a crash while working in the vicinity of the Falls Fire, north of Burns, on July 25, 2024.

Initial reports show fires have destroyed as many as 28 homes and 73 structures. Much of the damage has been to grazing land and livestock, heavily impacting the ranching community in eastern Oregon.

More than 10,000 people are involved in the response including 261 fire crews, 483 engines and 31 helicopters. Local and statewide emergency response departments and agencies are working around the clock to contain the remaining wildfires.

DSAC members,

I just got the notice that the DSAC is meeting via email. The notice was dated Sept 17 for a Sept 19 meeting. Pretty short notice. I do not believe I received a notice of the last meeting although I (supposedly) subscribe to meeting notices.

Only 3 minutes are allowed for public comments so I will comment here.

The agenda says you are going to have a staff presentation on public engagement. Good.

I would have to say that the County's past efforts at public engagement have been a bit lacking or underwhelming or even confusing. It isn't really very clear who is doing what or even when or why. And it appears that some or many within the "engagement" process don't even agree whether "engagement" is desired or should perhaps be avoided or limited. I sense that some may even want to discourage "engagement". Even the actors and their roles are unclear, confusing and perhaps work at cross purposes. It appears to me that the whole issue of solid waste is very poorly addressed and managed by the County at the Commissioner level and staff level. I feel sorry for members of the public who serve on volunteer advisory committees. And sorry for the public who can't make sense of it all.

I looked at the slides of the staff presentation for the Community Engagement process that are posted at the web site. The "roadmap" seems to indicate that the County is relying on citizens to know about the DSAC; to know the purpose of DSAC; to be facebook participants; to know the meeting schedule; know that there is a DSAC page at the county website; and know how to go to the County website and find agendas. I don't think many citizens are going to engage in this manner (perhaps up to .1% or 100 people will). So you aren't going to hear from a very broad segment of constituents. People are busy and they don't go around hunting for things the City or County are doing or not doing. The County needs some new ideas.

There actually are a lot of people who are somewhat interested in the landfill. They are concerned about how it impacts the city and county environment. They wonder about long term adverse environmental and economic impacts. They question if it is properly operated, monitored and regulated for the benefit of County residents, rate payers and taxpayers. Mostly they worry the landfill might be an environmental and economic risk in the short and long term. But they do not take the time to go to the County website each week to see if something new is posted or going on. Many get information by word of mouth, social or professional organizations, newspapers, or direct mail (email or snail mail). They also only testify or

submit written material if they think their input is needed or will influence the process - which often doesn't seem the case.

My question is: Is your "outreach" intended to inform or to receive input? Or perhaps both? And who's "outreach" is this? The citizen advisory committee or county staff or the Commissioners? My bet is that the DSAC would structure outreach differently than the Commissioners or the staff, particularly if trust is low.

If you want to inform, you are going to have to actually put information in front of citizens eyes and it will need to be something they are interested in or willing to give it a quick review if not careful attention. How? Direct periodic mailers to all registered voters or to all Benton County addresses might be one method. Not a PR piece but an actual informative piece.

If you want input, you have to go out and get it, not wait for someone to contact you. And meetings announced two days before the meeting and then allowing only 10 or 20 total minutes with only 3 minutes per speaker is hardly a way to get quality feedback or input. The DSAC is going to have to go out into the communities if you want real "engagement". One way of doing that might be to hold well advertised/promoted meetings in, say N. Albany, Adair, Corvallis and Philomath. Again, direct mail invitations. Have a short presentation or orientation with plenty of time for questions and comments. You might actually get good attendance at these meetings since they seem more to be for the people (to provide input) rather than an afterthought at some poorly scheduled meeting at some government location at some remote building owned by the county. Try meeting the people where the people live (if you really want engagement).

Moving on. I don't think the County has the resources to actually deal with a landfill and its consequences. The County obviously does not have time to prepare meeting agendas in advance and provide adequate notice. Or to prepare effective "roadmaps". The County Commissioners use revenue from the landfill to fund the general fund, not to hire staff to fully and competently administer a landfill site. If the County wants to "host" a landfill, then they should take the revenue to hire an administrative and professional full time staff to oversee the landfill. Adequate oversight of the site is not and will not be done by DEQ - ever. If you want community understanding and either begrudging acceptance or support for actions by the County, then your "engagement" strategy must include adequate full-time, qualified, professional and technical staffing.

Finally, I think most people do not understand how the County has structured the landfill issue(s). The difference between DSAC and ENRAC is not known to most residents and frankly it is confusing. Many distrust the motive and intent of the County. If you have a "roadmap" or "engagement" process for DSAC,

you might also want to have one for ENRAC also. And present them in a coordinated fashion so that citizens can understand the County's overall approach to approving, monitoring and regulating the site. People don't discern between the operation of the landfill and the approval of an expansion (new landfill) so they are likely confused about how and when to "engage".

Thank you to the volunteer citizens who agreed to serve on the DSAC - your work is essential.

Rolland Baxter

Corvallis, Oregon

Testimony to the Benton County Disposal Site Committee, September 19, 2024

Mark Henkels, 7540 NE Pettibone Drive, Corvallis OR. <mphcorvallis@gmail.com>

I assume multiple people here will testify to the risks and long-term costs associated with potential fires, leachate, air pollution/greenhouse effects, and traffic. Others can note how these issues remain essentially unsolved and would be tremendously intensified with the expansion and the inexplicable lifting of annual dumping limits the expansion would allow.

I want to draw attention to the current and future impact the landfill has on one of our region's foremost recreational and ecological sites: the E.E. Wilson Wildlife area. This place is absolutely and intimately connected to Coffin Butte. It is one of the most used outdoor recreation sites in this area (and perhaps the state), providing opportunities for shooting, archery, hunting, fishing, birding, historical and archeological education, and hiking. As the BCTT final report notes, the refuge is a key link in our regional system of wildlife refuges and a major recreation area, and has been identified by the Benton County government as a high-priority area for conservation actions to benefit key local species.

Coffin Butte Landfill looms over the refuge. Traffic from the landfill and the associated refuse processing site directly and powerfully affects the area. Beyond the driving safety and huge visual and auditory impacts, I can testify that some days I have smelled the operation strongly while visiting E.E. Wilson. Probably the more fundamental threat to E.E. Wilson is that the water that gives life to the refuge and supports its well-used fishing site, directly flows both on the surface and underground from the landfill site. Then there are the potential impacts of all the other risk factors, such as fire or the "Big One" earthquake, which could essentially turn not only the landfill site but this immediate area to the east into a wasteland.

I do not mean to be dramatic or to exaggerate. But any analysis of the impact of the landfill operations or of the potential impacts of expansion would be grossly incomplete if the effects on E.E. Wilson are not considered. Members of this workgroup, and all involved in this decision-making, should visit E.E. Wilson to see how much it is used and how small and superficial of a barrier Highway 99W is between the huge industrial facility of the landfill and this uniquely valuable community resource.

Thank you for your time and attention.

Dear Ken Eklund -

I live in Benton County, and I am writing to state my opposition to the landfill expansion. I am very concerned about the health implications of continuing to discharge leachate into the Willamette River. As you undoubtedly know, this is not good for human health. The PFAS are of particular concern to me because **"PFAS are difficult for humans to detoxify** and have half-lives measured in years. They are excreted through urine, menstrual blood, breast milk, and stool but not through sweat. Most of the detoxification is through the liver, though mechanisms are unclear." This quote is taken from a NIH study.

There are too many unknowns - for example, most studies have taken place on one PFA - there are approximately 14,000 - no one knows how different PFAS interact - and what the cumulative impact is on drinking water that is continually contaminated with PFAS, heavy metals, etc.

At least the landfill expansion should be delayed until these issues can be studied further.

Joanna Stockslager
1580 NW Cascade Heights Drive
Albany, OR 97321

Relevant news articles since last meeting

9/17/2024

Gazette Times

https://gazettetimes.com/eedition/page-a7/page_37bbdcba-dba1-5da5-a9fd-1cec476cba73.html?utm_medium=social&utm_source=email&utm_campaign=user-share

DSAC - Come to a landfill committee meeting

9/24/2024

Gazette Times

https://gazettetimes.com/eedition/page-a8/page_27a44987-f291-5df0-b124-15b830d34e15.html

Coffin Butte - Become familiar with landfill issue

9/25/2024

Canary Media

<https://www.canarymedia.com/articles/methane/colorado-launches-first-of-a-kind-landfill-methane-monitoring-program>

Methane - Colorado launches first-of-a-kind landfill methane monitoring program

9/26/2024

Waste Dive

<https://www.wastedive.com/news/epa-warns-landfill-owners-gas-monitoring-collection-enforcement-alert/728128/>

Landfill - Monitoring - EPA warns landfill owners to meet gas monitoring and collection obligations amid noncompliance

9/27/2024

6 News

<https://cbs6albany.com/news/local/lawmakers-push-for-fence-line-air-monitoring-at-dunn-landfill>

Landfill – Monitoring - Lawmakers push for fence line air monitoring at Dunn Landfill

**DSAC letter to Benton
County Board of
Commissioners
regarding the Updated
2023 Coffin Butte
Landfill and Pacific
Region Compost Facility
Annual Report**

Acknowledgement of extent of effort.

Committee members acknowledged the extensive work put into the LAR.

PROCESS RECOMMENDATION

It was suggested that the guidance document include specific recommendations for Republic to enhance their reporting and transparency practices.

Moved and seconded that we the Committee accept the report along with the amended, with guidance to the Commissioners summarized above; passed September 19, 2024.

PROCESS RECOMMENDATION

The LAR review process might be expedited if the Board of Commissioners established a list of subjects that are of perennial interest to the County, perhaps in the form of questions for the landfill operators to answer, and supplied this evergreen list to Republic but also to DSAC. DSAC could benefit from having such a list to hand as a guide to its annual review, to make sure that important issues are adequately addressed before the LAR comes before the Board. Republic could also benefit from having a baseline to operate from, so that questions important to Benton County do not go unaddressed in the report.

This subject/question list might also contribute to timely and appropriate action on issues. Currently, Republic releases data about operations as required, and publishes some of this data in the Annual Report, but there seems to be no process by which the data and the conversations it engenders continue from year to year or lead to action or follow-up. The Committee had no information about last year's review of the Landfill Annual Report, for example.