



# **Benton County Disposal Site Advisory Committee**

**Packet for meeting on March 12, 2025**

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

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**Disposal Site Advisory Committee (DSAC)**

**AGENDA**

**March 12, 2025**

**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=EQw4Ofo6VVJNGuVr9KmWhTx96R6LKs.1>

Meeting ID: **882 4792 1911**

Passcode: **680718**

DSAC website with meeting materials, including the meeting packet:

<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.	Public
3	6:25 p.m.	10 min.	Last meeting's minutes and review of last month's action items – Review, edit as necessary, and approve Committee minutes for January 8, Please review the draft minutes (in meeting packet) and meeting video ( <a href="#">link</a> ) ahead of time.	Committee
4	6:35 p.m.	15 min.	Approval of 2024 Coffin Butte Landfill Community Concerns Annual Report	Committee
7	6:50 p.m.	5 min.	Break	Committee
9	6:55 p.m.	55 min.	DSAC Scope and Goals <ul style="list-style-type: none"><li>○ Methane and odors</li><li>○ Fire safety</li><li>○ Other ideas from committee</li></ul>	Committee
10	7:50 p.m.	5 min.	Request Agenda Items, staff requests for next meeting	Committee
11	7:55 p.m.	5 min.	Next meeting/wrap up/adjourn	Chair



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### Disposal Site Advisory Committee (DSAC) Membership

Name	Term	Name	Term
Rachel Purcell, Chair	1/1/24 - 12/31/25	Chuck Gilbert	1/1/24 - 12/31/25
David Hackleman, Vice-Chair	1/1/24 - 12/31/25	Paul Koster, Landfill Representative	1/1/24 - 12/31/25
Jennifer Field	1/1/24 - 12/31/25	Vacant	
Brent Pawlowski	1/1/24 - 12/31/25	Vacant	
David Livesay	10/1/24 - 12/31/25	Vacant	
Charlene Carroll	10/1/24 - 12/31/25		
<b>Benton County Staff</b>			
Petra Schuetz, Interim Community Development Director			
Bailey Payne, Solid Waste Program Coordinator			

DSAC Members Excused:

### Action Items from Last Meeting:

Action Items:	Lead	Status
Landfill Emissions Monitoring: <ul style="list-style-type: none"> <li>Request additional data on landfill gas collection versus fugitive emissions from Republic Services.</li> <li>Review Carbon Mapper data for landfill methane emissions and compare it to other Oregon landfills.</li> <li>DSAC to continue monitoring methane capture efficiency and energy conversion rates in future meetings.</li> </ul>	Hackleman / Republic Services / Payne	
Coordination with ENRAC: <ul style="list-style-type: none"> <li>Explore potential collaboration between DSAC and ENRAC regarding the Coffin Butte landfill expansion review.</li> </ul>	McGuire / Purcell	
Republic Services to summarize their current efforts and plans regarding fire safety measures for inclusion in the fire safety report.	Republic Services / Hackleman	

## **ORS 459.320**

The board of county commissioners of a county in which a regional disposal site is proposed to be located shall establish a local citizens advisory committee comprised of...

- (a) Residents residing near or adjacent to the regional disposal site
- (b) Persons who reside in or own real property within the county in which the regional disposal site is located
- (c) Employees of the permittee

### **From Chapter 23 of Benton County Code**

One or two employees of Republic Services, Inc., are appointed to the Committee. It is the intent of the Board of Commissioners that these permittee members will assist DSAC in reviewing the regional disposal site, in responding to community comments, questions and concerns, and will assist in promoting a constructive forum for dialogue between the community, DSAC and the owner or operator of the regional disposal site.

**The purpose of the Disposal Site Advisory Council (DSAC) is to advise the Board and support the County in fulfilling its mandates under ORS 459.320-330.**

#### **Specific Duties of the DSAC**

- (1) Review the siting, operation, closure, and long-term monitoring of the Coffin Butte landfill; and
- (2) Provide a forum for community comments, questions and concerns about the regional disposal site and promote a dialogue between the community and Republic Services; and
- (3) Prepare an annual report summarizing the local community members' concerns and the manner in which Republic Services is addressing those concerns. The Community Development Department shall submit the report to the Oregon DEQ and the Benton County BOC.
- (4) DSAC may undertake other tasks and duties as directed by the Benton County Board of Commissioners.

#### **What the Board of Commissioners expects:**

- An advisory council attuned to the County's 2040 Thriving Communities Core Values and Focus Areas, helping move initiatives forward and providing reasoned recommendations on appropriate topics
- The Board expects committees to work cooperatively, be responsive to the public while also making progress on Board priorities





**MEETING MINUTES**

**Disposal Site Advisory Committee (DSAC)**

**February 12, 2025**

Benton County DSAC Chair Rachel Purcell called the meeting to order at 6:03 P.M. The meeting was open to the public virtually via a published Zoom link.

**COMMITTEE MEMBERS ATTENDING**

Rachel Purcell, Chair  
David Hackleman, Vice-Chair (virtual)  
Jennifer Field (virtual)  
Chuck Gilbert  
Brent Pawlowski  
Charlene Carroll  
David Livesay  
Bret Davis, Republic Services

**STAFF**

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

**GUESTS**

Paul Neatfeld, County Resident; "PGN in chat"  
Debbie Palmer, County Resident  
Kevin Kenaga (from Zoom Reports)  
Lucy Jones (from Zoom Reports)

**Agenda Item #1: Call to Order**

**Agenda Item #2: Public Comment**

Paul Nietfeld raised concerns about discrepancies in landfill intake volume data, noting a difference between his calculated figure of 1.045 million tons and the DEQ report of 1.117 million tons, a difference of over 72,000 tons. He requested clarification and guidance on reconciling the numbers. Nietfeld also highlighted concerns about enforcement of landfill intake limits. Davis acknowledged the discrepancy but lacked an immediate explanation, noting some materials might not be included in franchise fees. The issue was referred to Payne for follow-up, with Neatfeld requesting to receive the findings.

**Agenda Item #3: Approval of Meeting Minutes from January 8, 2025**

**Review of Previous Meeting Minutes**

- The committee reviewed the minutes from the last meeting and checked for any necessary corrections.

- A correction was noted: A member was mistakenly referred to as "Commissioner" instead of "Committee Member."
- The error appeared in multiple places, including page 2 of the document.

#### **Discussion on the Style of Meeting Minutes**

- A member noted that the minutes were summarized differently than in previous meetings.
- Previously, the minutes followed a detailed, play-by-play format, while the new format was more synthesized and summarized.
- Concern was raised that some important discussions were omitted, including a discussion on methane emissions monitoring and David Hackleman's work with Republic Services on methane data.
- The committee debated whether the new format was effective or if more detail was needed to ensure key discussions were properly recorded.

#### **Committee Input on Minutes Format**

- Some members preferred a balance between summary and detail, ensuring important points were not lost.
- The administrative assistant handling the minutes was acknowledged as experienced, but guidance might be needed to ensure completeness without creating a transcript-like record.

#### **Final Checks for Comments or Corrections**

- Members were given a final opportunity to provide additional comments or corrections before proceeding to the review of action items.

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### **Agenda Item #4: Coffin Butte Landfill Expansion Update**

#### **1. Review of Action Items and EPA Communication Issues**

- The committee reviewed the previous meeting's action items, including outreach to DEQ and EPA to determine if there was an active case involving Coffin Butte.
- Payne reported that he did not receive a substantive response from DEQ or EPA, only basic test results without interpretation.
- Concerns were raised about the lack of transparency from EPA and conflicting reports in the media.
- Republic Services confirmed receiving an EPA information request, but it was not a violation or fine—just a standard landfill operations inquiry.

#### **2. Concerns Over Public Perception and Lack of Clear Information**

- Hackleman and others expressed concern that misinformation was spreading due to the lack of clear communication from regulatory agencies.
- Discussion on media coverage: Reports suggested an open EPA case, but official records do not list Coffin Butte as an active enforcement case.
- Senator Merkley's comments were brought up, implying EPA was investigating, but no official confirmation was available.

#### **3. Landfill Methane Emissions & Monitoring Issues**

- The committee revisited methane exceedances and how they are reported.
- Republic Services explained that finding exceedances is a normal part of landfill management, used to identify and correct problem areas.

- Concerns were raised that the public only hears about the exceedances, not the corrective actions taken.
- Proposal to track improvements over time to demonstrate effectiveness of corrective actions.

#### **4. Lack of Communication from Regulatory Agencies**

- The EPA and DEQ do not freely share inspection reports, and often, information is obtained only through FOIA requests.
- The committee discussed ways to improve direct communication with regulators.
- Some members suggested formalizing a process to request regular updates from DEQ and EPA.

#### **5. Need for a Communications Representative**

- Carroll was appointed as Chair of a new Communications Subcommittee to act as the committee's liaison with external entities.
- The goal is to ensure transparency and facilitate better communication with the public and regulators.

#### **6. Coffin Butte Expansion Update**

- Republic Services submitted an expansion application on January 15th.
- Benton County deemed the application complete, but additional documents are being prepared before review.
- The application will go through multiple levels of review:
  - April: ENRAC review
  - May-June: Planning Commission decision
  - Possible appeals to the Board of Commissioners and Land Use Board of Appeals (LUBA)

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### **Agenda Item #5: Update on Fire Safety**

#### **Discussion:**

- Republic Services and Benton County staff provided an update on fire safety measures at the landfill.
- A prior third-party fire risk assessment determined that the overall risk remains minimal.
- Republic Services is evaluating the feasibility of implementing a Fire Rover, a solar-powered fire monitoring system; however, insufficient cellular service at the landfill poses a challenge. Alternatives such as Starlink are being explored to support the system.
- Estimated costs for the Fire Rover system range from \$75,000 to \$100,000, with additional monthly monitoring fees between \$1,500 and \$2,000.

#### **Committee Discussion & Concerns:**

- Hackleman inquired about more cost-effective alternatives and suggested increased collaboration with local fire departments to explore additional solutions.
- Concerns were raised about fire detection after operational hours, as past incidents were reported by passersby rather than on-site monitoring.

- Committee members emphasized the need for an improved response plan, including using water trucks and soil coverage as primary suppression methods.

**Action Items:**

- Republic Services to continue evaluating feasibility and cost of the Fire Rover system.
- Committee to review fire safety measures at a future meeting, incorporating recommendations from fire department representatives.

**Agenda Item #6: Approval of 2023 Coffin Butte Landfill Community Concerns Report**

**Discussion:**

- The committee reviewed the 2023 Coffin Butte Landfill Community Concerns Report, a compilation of public concerns received by Benton County, Republic Services, and Oregon Department of Environmental Quality (DEQ) over the past year.
- Members noted variations in how concerns were documented, with some issues summarized briefly and others copied verbatim from public comments.
- A discussion was held on whether to refine the report's format to provide more consistency in future versions.
- It was clarified that the report is primarily required by Oregon DEQ, but copies are also provided to the Board of Commissioners.

**Committee Action:**

- A motion was made to approve the community concerns report as written.
- Motion was seconded and passed unanimously (Pawlowski; Carroll seconded).

**Action Items:**

- Committee to revisit the structure of the 2024 Community Concerns Report to ensure consistency in summarizing public input.

**Agenda Item #7: DSAC Scope and Goals: Methane, Fire Safety, Odors**

**Methane Discussion:**

- The committee discussed the monitoring and mitigation of methane emissions and landfill odors as part of its ongoing goals.
- David Hackleman raised concerns about the public's perception of odors as a proxy for contamination. He noted that while some odors are detectable and harmless, others may be undetectable yet hazardous.
- It was mentioned that methane itself lacks an odor and does not dissolve in water, making detection more complex.
- Committee members explored the possibility of deploying air quality monitoring stations at strategic locations to better track odor sources and improve community reporting.

- The committee also acknowledged that odor complaints often lack clear attribution, as different facilities and natural conditions contribute to variations in perceived smells.

**Committee Action & Next Steps:**

- Benton County and Republic Services staff to research air quality monitoring technologies and assess feasibility for implementation.
- Republic Services to continue methane monitoring efforts and report findings to the committee.
- Further discussion scheduled for a future DSAC meeting to evaluate potential mitigation strategies and community engagement efforts.

**Fire safety Discussion:**

- The committee revisited fire safety concerns at the landfill, focusing on monitoring and response capabilities.
- Hackleman emphasized the need for cost-effective fire monitoring solutions, expressing concerns over the high cost of a Fire Rover system (estimated at \$75k to \$100k with ongoing monitoring fees of \$1,500 to \$2k per month). He suggested a meeting with Republic Services, county staff, and Adair Rural Fire & Rescue to explore more affordable alternatives.
- Republic Services provided an update on existing fire suppression strategies, including:
  - 1,500 to 2,000-gallon water trucks on-site.
  - Stockpiling soil for immediate fire suppression to reduce the need for water.
  - Minimizing the landfill's active working face to better control potential hot spots.
- Concerns were raised regarding after-hours fire incidents, as recent fires were detected by passersby rather than on-site monitoring.
- The committee discussed potential partnerships with local fire departments to improve fire detection and response planning.

**Committee Action & Next Steps:**

- Benton County staff to coordinate a meeting with Republic Services and fire department representatives to assess fire safety options.
- Republic Services to evaluate alternative fire monitoring solutions and report findings at a future meeting.

- Committee to continue discussions at future DSAC meetings, incorporating recommendations from fire safety experts.

#### **Committee Member Ideas:**

- Hackleman raised a question regarding whether DSAC's responsibilities include oversight of the composting site across the road from Coffin Butte. It was noted that while DSAC's primary focus is the landfill, concerns related to the composting site could be brought up within the committee.
- There was a suggestion to include a summary of DSAC's mission and responsibilities at the beginning of each meeting's minutes to help guide discussions and maintain alignment with the committee's purpose.
- Members expressed interest in clarifying DSAC's role in relation to ENRAC, particularly concerning landfill expansion reviews. It was noted that while ENRAC evaluates the expansion proposal, DSAC can still submit public comments and recommendations independently.
- A proposal was made to invite the Benton County attorney to provide an overview of DSAC's legal scope and authority to ensure the committee is operating within its intended function.
- The committee discussed establishing a designated liaison for external communications, particularly for outreach to government agencies such as the EPA and Oregon DEQ, ensuring that DSAC has an official representative for inquiries and information requests.

#### **Action Items:**

- Staff to coordinate with the County Attorney for a future presentation on DSAC's legal scope.
- DSAC to define its engagement strategy with ENRAC on landfill-related matters.

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### **Agenda Item #8: Request Agenda Items, staff requests for next meeting**

#### **Discussion:**

- The committee discussed potential agenda items for the next meeting, with members suggesting several topics for further review.
- Charli Carroll raised concerns about PFAS contamination from landfill liners and the potential impact on leachate treatment and water quality. She requested a discussion on how leachate containing PFAS is managed before it reaches local waterways.
- David Hackleman suggested dedicating time to hydrology and groundwater flow studies, particularly in relation to how landfill operations may affect local water systems. He proposed inviting relevant experts to present findings on groundwater monitoring and contamination risks.

- Brent Davis recommended addressing public misinformation regarding landfill operations, citing a mailer that claimed leachate was being dumped into the Willamette River. The committee agreed to clarify the accuracy of such claims and discuss how DSAC should engage with public concerns.
- Members debated whether to maintain public comment sessions in future meetings. While some favored using meeting time to focus on DSAC goals, others felt it was important to continue addressing community concerns as landfill expansion discussions progressed.

**Committee Action & Next Steps:**

- Staff to invite groundwater and hydrology experts to a future meeting.

**Adjourned at 8:09 P.M.**

**Next Meeting: March 12, 2025, Holmes & Shipley Meeting Room, First Floor, Kalapuya Building, 4500 SW Research Way, Corvallis, Oregon**

Action Items	Lead	Status
1. Pawlowski to follow up with finance team regarding discrepancy between actual tonnage and franchise fee tonnage reported.	Pawlowski	
2. Payne to forward EPA information request letter to committee members.	Payne	Included in 3/12/25 meeting packet
3. Hackleman to coordinate with Koster and Pawlowski to discuss landfill emissions monitoring.	Hackleman	
4. Pawlowski to set up meeting time for Hackleman to discuss fire safety options with Koster and Adair Rural Fire Department representative.	Pawlowski	
5. Carroll (as Communications Subcommittee Chair) to reach out to Senator Merkley's office, Statesman Journal, and Gazette Times reporters regarding EPA statements about Coffin Butte.	Carroll	
6. Payne to coordinate with Koster to prepare for a hydrology presentation, potentially in May 2025.	Payne / Koster	
7. Committee to discuss how to address public claims about leachate disposal at a future meeting.	Committee	

**Minutes Prepared By:** Amanda Makepeace, Administrative Assistant

# Planning DSAC Schedule for 2025

January '25						
S	M	T	W	T	F	S

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April '25						
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December '25						
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# 2024 Coffin Butte Landfill Community Concerns Report



## 2024 Coffin Butte Landfill Community Member Concerns Annual Staff Report

*Prepared By:* Bailey Payne, Benton County Community Development Department, Solid Waste Program

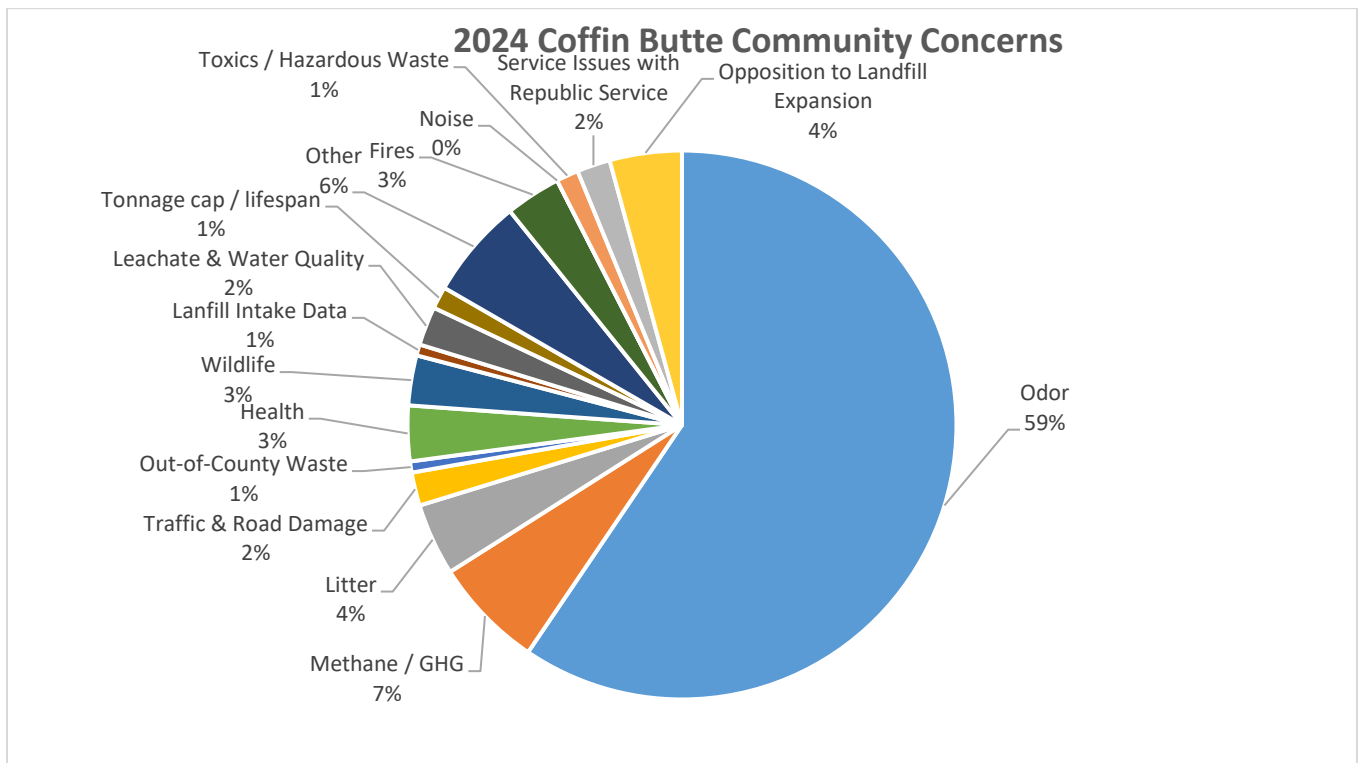
*Preparation Date:* February 19, 2025

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 (DEQ) as part of issuing and renewing a solid waste permit.

Benton County staff and the DSAC have prepared the following report summarizing community member concerns regarding Coffin Butte Landfill in 2024, 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 complaints received by Benton County staff, complaints received by the Oregon DEQ and Republic Services and concerns presented during DSAC meetings.

Two hundred thirty-three complaints about the Coffin Butte Landfill were reported in 2024 as detailed in the table below. 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 complaints received were fairly evenly distributed by topic, with the exception of odor complaints. Odor complaints were 59% of all of the concerns reported. In response, Coffin Butte Landfill has reported that it has expanded its methane capture system to reduce fugitive gasses from escaping and regularly makes repairs to tarps and wells.



#	Date Received	Concern Summary	Method Complaint Received	Response
1	1/11/24	Concerns about landfill odor – “Dump Day” in Adair Village and points north. “I’m at Santiam School, and I can taste it.”	DSAC Chair	Not reported
2	1/11/24	Concerns about landfill odor – “take a quick drive up towards Tampico and over towards 99. Adair was stinky mid afternoon, and it's gotten worse and pretty bad right now.”	DSAC Chair	Not reported
3	1/11/24	Concerns about landfill odor – “Coming back from town around 3:00 today, the dump stench around CV [Crescent Valley] was overpowering!”	DSAC Chair	Not reported
4	1/13/24	<p>Concerns about road hazards, landfill odor – “I've been driving weekly on highway 99 S from Corvallis to Salem and have noticed a significant increase in large truck traffic coming in and out of the Coffin Butte landfill. A visible change in the landfill seems to be occurring...</p> <p>“Last Friday on January 12th, 2024 there was a toxic smell as a truck pulled out in front of me, and it endured for miles as I followed behind it at some distance - there was no visible back-of-truck license plate on the truck so that I might identify what the source or company was.</p> <p>“There seems now to be every couple of minutes a very large truck crossing onto or over Highway 99 at the Coffin Butte junction when I go by on Fridays in late mornings or early afternoons. Due to the frequency of large trucks entering and exiting, out-of-area incoming trash to the landfill seems as if it may have increased. In addition, I never used to actually smell the landfill as I passed by. However, these last 2 Fridays a strong smell was evident for quite a distance.”</p>	DSAC Chair	Not reported
5	1/28/24	Concerns about landfill odor – “I was helping 2 friends in N. Albany (one on North Heights and one on Broadway) Dump stench was present.... Sure wish we could make people aware of what they are smelling or seeing.”	DSAC Chair	Not reported
6	2/2/24	Concerns about landfill odor – “It's another stinky day in the neighborhood... With the wind drifting due south today, we're getting the full "dump stink" on the east side of Tampico Ridge, guessing it might be bad on the west side too.”	DSAC Chair	Not reported
7	2/7/24	Concerns about landfill odor – “The landfill is stinking it up again today. Just filed another DEQ complaint.”	DSAC Chair	Not reported
8	2/9/24	Concerns about landfill odor – “Yesterday late morning, stepping out of my car just north of Luckiamute River just off 99 made me cringe. I hurried inside, so I didn't have to be out there in the stink. Likely the exact scenario that caused the vineyard sale on Airlie to fall through.”	DSAC Chair	Not reported
9	2/9/24	Concerns about traffic safety, landfill odor – “The Adair community is growing leaps and bounds. School age children attending Santiam Christian. School busing intertwined with garbage trucks and large tractor trailers hauling trash throughout the day. That new housing trac and a growing school being subjected to toxic air.”	DSAC Chair	Not reported

10	2/9/24	Concerns about landfill odor – Soap Creek Valley – “Today is a dump day at our house”	DSAC Chair	Not reported
11	2/11/24	Concerns about landfill odor – 6:30pm, Hwy 99 by dump, "nose burning stench"	DSAC Chair	Not reported
12	2/13/24	Concerns about water quality – groundwater and runoff arsenic contamination – “We know that Coffin Butte Landfill produces leachate that is very high in arsenic. A seepage event in the early 1990s (acknowledged by Valley Landfills Inc.) resulted in high arsenic levels in one monitoring well along Coffin Butte Road, and since then several wells on the east side continue to show anomalously high arsenic.”	DSAC Chair	Not reported
13	2/17/24	Concerns about landfill odor – North Corvallis – “Can somebody please tell me what that horrible smell is here around the neighborhood market of Walmart? — post on Nextdoor”	DSAC Chair	Not reported
14	2/17/24	Concerns about landfill odor – Writsman Creek Road – “This morning I woke up to dump smell, we had a breeze coming up Soap Creek Valley (N to S) it was getting more pungent as the morning progressed.”	DSAC Chair	Not reported
15	2/24/24	Concerns about landfill odor – Coffin Butte overlook – “the odor was bad up there at times”	DSAC Chair	Not reported
16	2/25/24	Concerns about landfill odor and how Republic Services addresses those concerns – the correspondent relayed communications with Oregon DEQ: “DEQ compares odor complaints from the community to Republic Services’ odor report from the same day. I wasn’t aware that someone on R.S.’s staff periodically checks for odors at Coffin Butte, Monday through Friday, and files a report. She noted that they rarely report odors, even on days when we are complaining about especially bad stench. (I noted to her that sometimes, up here on Zeolite Rd., that weekends are just as likely to stink as weekdays!)”	DSAC Chair	Not reported
17	2/26/24	Concerns about roadside trash – Highway 99W – “I was appalled by the amount of trash along Hwy 99W on my way home from Rickreall. It caught my eye when I saw home owners standing in the ditch with bags and trash pickers stabbing plastic waste out of vegetation in their right of way. There is a lot of mostly plastic trash litter scattered all along the highway south of Monmouth from Helmick Park to the dump. These folks need to have a voice on the Disposal Site Advisory Council. I know that won't happen under the current DSAC bylaws, but they should be part of an expanded DSAC to go along with the new multi-county Solid Waste Plan.”	DSAC Chair	Not reported
18	2/26/24	Concerns about roadside trash – Independence Highway – “The roadside garbage along Independence Hwy is appalling (the section between Ryals and Hwy 20). I’ve been driving that stretch once or twice a week for the last 4 years. Despite Republic telling us that they do periodic trash pick-up days, the garbage in the ditches and in the surrounding fields is a constant and seems to be getting worse. I can only assume every heavily traveled route to Coffin Butte is lined with garbage. This is the welcome mat we put out for those driving to our area from other places....”	DSAC Chair	Not reported
19	2/27/24	Concerns about landfill odor – filing odor complaints – “the Republic Services “Odor Complaint Form” was REALLY	DSAC Chair	Not reported

		<p>INTERESTING: I clicked on that link and it did indeed bring up a form where you can “report an odor concern” specifically attributable to the Landfill. That was a surprise! Because a little voice in the back of my mind said, <i>hm, last time I went to Coffin Butte Landfill’s website looking for a way to complain about landfill odors, the only option was a complaint form for PRC, their composting facility. Zero options for complaining about landfill odor.</i> So I did a little research. Went to the website archive.org (where you can enter a URL in their “wayback machine” and see what the history of a web page is, aka see what it looked like over time). When I entered the URL for the odor complaint form, sure enough, as recently as December that URL went to a PRC odor complaint form, not a Landfill odor complaint form! Which means Republic Services having an actual place to complain about Landfill odors... is NEW as of 2024!</p> <p>“If you go directly to the landfill’s website looking for the form... you can’t find it! It is not on the “Contact Us” or “Resources” page, it’s not in their FAQ... or anywhere else. It’s a hidden page. So yeah they do have it, but clearly only begrudgingly. If you search for “Complaint Form” or “Odor Complaint” on their website — you get no results. THE ONLY WAY TO FIND IT right now is to search on the word “Odor” ... and then and only then is there a clickable link to their “Odor Report” form.”</p>		
20	2/27/24	Concerns about landfill odor – Highway 99W – “I noticed strong odors Thursday the 22nd. We (my family and I) were driving hwy 99W northbound on the 22nd around 5:30/5:45pm-ish. I had a respiratory infection at the time which affected my sense of smell, but just before Adair Village I noticed a “weird” smell and it got stronger right as we passed the landfill.”	DSAC Chair	Not reported
21	2/27/24	Concerns about landfill odor, wildlife impacts – “I was at EE Wilson on Sunday the 25th, and the smell was noticeable there. A sharp inorganic smell. Even more noticeable though were all the birds that had collected at the top of the landfill. There were several bald eagles and even some golden eagles there, as well as other raptors, hundreds of seagulls and even more crows, ravens and starlings. Sundays are a big day for them it seems, as there are no humans to disturb their dining – although from time to time a raptor would make a run and a thousand birds would explode off the working area and into the air. I know the landfill is supposed to cover the new garbage at the end of each day with dirt, but seems that didn't happen on Saturday EOD.”	DSAC Chair	Not reported
22	3/5/24	Concerns about the recording and preservation of public landfill concerns – “It was told to me yesterday at the meeting by the county manager that because DSAC was not meeting, it kept the complaints from being collated – and that when DSAC begins to meet again then the process of relaying the complaints could begin again. How circular!”	DSAC Chair	Not reported
23	3/5/24	Concerns about air quality – particulate pollution – “I have an ongoing interest in Coffin Butte. Based on a conversation with Mark Yeager I pulled together the attached narrative concerning particulate pollution. It is not ready for distribution but I’d like to get your reaction to the information. I’d also like your ideas on how to get the information out to the community.” Attachment:	DSAC Chair	Not reported

		research summary entitled “Coffin Butte’s Air Pollution Not Just Methane and Odors.”		
24	3/7/24	Concerns about landfill odor – “Today is another “Dump Day” — stinky, smelly especially over in Adair Village and around the school there.”	DSAC Chair	Not reported
25	3/17/24	Concerns about landfill odor – Soap Creek Valley – “Well, it is another lovely smelling dump day at the south end of the Valley. Last Thursday was also a dump stench day. Another sunny morning ruined for anything outdoors. The frequency and intensity of these dump days is absolutely unacceptable.”	DSAC Chair	Not reported
26	3/26/24	Concerns about landfill odor – North Corvallis – “A neighbor just texted me and said that the dump smell in North Corvallis (9th & Circle) today is "overpowering". — Nextdoor	DSAC Chair	Not reported
27	3/28/24	Concerns about the climate crisis / landfill greenhouse gases – correspondent sent an article, “Landfills Bake the Planet Even More Than We Realized” by Sachi Mulkey in <i>Grist</i> ,” noting that the climate-data sleuths at Carbon Mapper published a study in Science that shows U.S. landfills emit methane at levels at least 40 percent higher than previously reported to the Environmental Protection Agency. “At more than half of the hundreds of garbage dumps surveyed — in the largest assessment yet of such emissions — most of the pollution flowed from leaks, creating concentrated plumes. The researchers found these super-emitting points can persist for months or even years, and account for almost 90 percent of all measured methane from the landfills. Tackling these hotspots could be a huge stride toward lowering emission rates, but blindspots in current monitoring protocols mean they often evade detection.”	DSAC Chair	Not reported
28	3/31/24	Concerns about landfill odor – Soap Creek Valley – “Yet again, another beautiful day with the heavy dump odor.”	DSAC Chair	Not reported
29	3/31/24	Concerns about landfill odor – Soap Creek Road – “ Landfill Odor 04/01/2024 – “Ken, do you have any idea why my email is being treated as spam by the County Commissioners office? It just bounces back. I have contacted them by phone and someone named Mindy is going to look at it from her end. Presumably someone is going to get back to me. I wondered if it is possible to reject email that the subject matter is “Landfill"..."!”	DSAC Chair	Not reported
30	4/2/24	Concerns about climate crisis / landfill greenhouse gases – “I don’t know if you and your group have seen this article based on a recent new study on landfill emissions? The journal article they reference is here: <i>Quantifying methane emissions from United States landfills</i> study in Science”	DSAC Chair	Not reported
31	4/21/24	Concerns about landfill odor – 8:00pm, Buena Vista	DSAC Chair	Not reported
32	5/1/24	Concerns about landfill odor – 2:47pm, Adair Village	DSAC Chair	Not reported
33	5/9/24	Concerns about landfill odor – 2:45pm, Adair Village	DSAC Chair	Not reported

34	5/16/24	Concerns about landfill odor – 11am, Adair Village	DSAC Chair	Not reported
35	5/17/24	Concerns about landfill fire – relaying radio dispatches about fire at the landfill – ACTIVE FIRE AT THE LANDFILL	DSAC Chair	Not reported
36	5/22/24	Concerns about landfill odor – Soap Creek Valley – “Good morning, The dump smell is overwhelming at our place (7:45 AM)”	DSAC Chair	Not reported
37	5/22/24	Concerns about landfill odor – points south of landfill – “We live about 5 miles south of the dump as the crow flies, and we are smelling dump stink this morning!”	DSAC Chair	Not reported
38	5/22/24	Concerns about landfill odor – south of landfill – I was bcc’ed on an email to Bailey Payne, Solid Waste Coordinator: “This was at about 7:45am (Thurs 5/23/24). The smell actually began to make me feel queasy so I went back inside. I heard from a number of neighbors that they smelled it too. The landfill operators are supposed to keep odors in check but do not. It is truly scary smelling the dump (especially at your own home!) because we do not know what all pollutants we are taking into our bodies. And it is very disturbing that if you don't want to breathe those unknown things in, you feel like you have to avoid going outdoors until the "coast is clear.”	DSAC Chair	Not reported
39	5/29/24	Concerns about landfill odor – "Dump Day in Adair, 2:30 pm”	DSAC Chair	Not reported
40	7/3/24	Various concerns – “Attached are my notes from the June 28th public outreach session.” Attached notes raise issues with increased odor generation due to simultaneously operating 2 dump working faces; building on contaminated land without appropriate preconstruction assessment, remediation if needed and follow-up monitoring; siting landfill operations outside of the designated Landfill Zone; lack of a plan to improve landfill gas collection and monitoring; misleading claims about landfill gas emissions (by focusing on the current power generation system, RS underreports the actual carbon footprint of the landfill.)	DSAC Chair	Not reported
41	7/14/24	Concerns about air quality – landfill gas emissions – Concerns about landfill odor and greenhouse gases – “It appears that Republic is proposing two separate operations i.e. there will be a working face on the north “Quarry side” of CB Road and another working face on the south side. This could mean twice the odor problems. At the 28 June Philomath public session, I asked Ian McNabb if the two areas would be operating simultaneously. His off the cuff answer was yes, then he said he was not sure and would get back to me. No reply yet.”	DSAC Chair	Not reported
42	7/21/24	Concerns about landfill monitoring and concerns for community advisory role – “Benton County land use code – chapter 24 governs the need for an advisory group to BOC for landfill operation/management, under Oregon revised statutes, chapter 459- waste management... ORS459.320 Regional Disposal Advisory site committee (public law) for counties which have regional landfills, or landfills larger then x. The Creation of Enrac without public input violates both chapter 24 of bc land use code and state of oregon chapter 459- ORS459.320.”  Concerns about water quality – toxic leachate – “PFAs and 1000's	DSAC Chair	Not reported

		of other toxins are being placed into the Willamette, for pennies by this corp, and damaging this ecosystem. State of Oregon has a house bill passed which goes over PFAS. Sources. Oregon Health Authority may manage leachate under some ORS they have. And Federal level is RCRA or Clean Water Act. Over time, Short Mountain landfill and Coffin Butte will have put x cubic feet of raw leachate into the Willamette per year, for pennies on the tanker loads, which run 356 days a year to all three water plants (Salem, Corvallis, Eugene-Short Mt)."		
43	8/6/24	Concerns about the climate impacts of greenhouse gas emissions and the water quality effects of leachate releases – "Methane is destroying the planet, so BC is currently allowing one of the largest sources of Methane in Oregon" and "I had a concern also from leachate dumped into the Willamette River at Salem and Corvallis, that 'Sorbol', the Hollingsworth and Vose nanoscale (PM2.5) fiber glass rod waste, may be able to bypass filters at both Waste Water Treatment plants in Salem and Corvallis to enter the Willamette River... The residual health impacts of RS using Sorbol are massive, as they ripple through the ecosystem and into entire cities possibly." Concerns also about the forever chemicals and long list of unknown toxics in leachate.	DSAC Chair	Not reported
44	8/10/24	Concerns about methods open to the community to communicate landfill concerns to Benton County – no avenues available – DSAC Chair to Bailey Payne: "We are [DSAC is] going to have public comment, so there really must be contact information added to the Committee webpages."	DSAC Chair	Not reported
45	8/12/24	Concerns about dump methane – "A question of interest to parents who live in Adair and the safety of their children, are they likely being impacted personally by methane on days they aren't smelling other dump fumes? Or are they likely occurring on the same days, as opposed to much more frequently?"	DSAC Chair	Not reported
46	8/12/24	Concerns about air quality – airborne PFAS – "I'm attaching a recent journal article that likely has some relevance to Coffin Butte... You folks probably heard about this issue lately as it did receive some press coverage...  While I have heard Republic Services and others make short mention of PFAS "forever chemicals" in the landfill leachate, I haven't heard any discussion about the possible implications of this study: there may be as much or more PFAS emitted in gas form as in leachate. 'These findings suggest that landfill gas, a less scrutinized byproduct, serves as a major pathway for the mobility of PFAS from landfills.'"	DSAC Chair	Not reported
47	8/12/24	Concerns about uncontrolled methane releases – "Monday, Aug 12, P.M. Kezi 9 News report: Senator Merkley is working to get the EPA to move along with Methane violation process as this CUP application is underway."  Concerns about future implications of hosting the landfill – "Benton County only contributes a small percentage of trash to this landfill, but BCounty is being impacted by all the Environmental costs, and financial costs on into the future, to insure and pay Republic or some other Waste Mgmt. firm, to maintain the landfill for 30 years or	DSAC Chair	Not reported



		<p>less after closure.”</p> <p>Concerns about “endless landfilling” at Coffin Butte – “The landfill owner is interested in creating more landfill cells, to the west, into Soap Creek Valley and are exploring this with Benton County.”</p> <p>Concerns about lack of final cover over most of the landfill.</p> <p>Concerns about closure of Coffin Butte Road – “A trash cell, in future may be planned, to bury Coffin Butte Road, and close it permanently, in order to connect the new South Dump at some point, to Cell 5E, the current, 2024 active dump.”</p> <p>Concerns about proper permitting for the expansion as a “new landfill.”</p>		
48	8/20/24	Concerns about landfill odor – Writsman Creek Road – "This morning the dump stench is hanging in the air!"	DSAC Chair	Not reported
49	8/22/24	General environmental concerns including greenhouse gas emissions and toxic leachate – “Coffin Butte RL is built in the wrong location, in a wet Mediterranean climate, is generating leachate which means it is also chemically, able to generating methane, as this landfill has been put on top of and up against a massive, water storing, water releasing, layered, rotting basalt geologic feature, Coffin Butte.”	DSAC Chair	Not reported
50	9/2/24	Concerns about landfill odor – Adair 7:57am	DSAC Chair	Not reported
51	9/9/24	Concerns about landfill odor – Adair, 8:04am. Nose burning, and throat tickling	DSAC Chair	Not reported
52	9/10/24	Concerns about landfill odor – Adair, 7:55am. "Soggy & heavy"	DSAC Chair	Not reported
53	9/22/24	<p>Concerns about fire – Pacific Region Compost – relaying radio dispatches – a large pile at the Pacific Region Compost is on fire.</p> <p>“1) no RS employees on site, despite having a burn pile today (no "watchers").</p> <p>2) I'd be curious to know what the PRC is burning in piles. If they are supposed to be composting, what are they instead disposing of by burning?</p> <p>“Would be interesting to see if they do a safety report every time something like this happens. Perhaps we can ask for a map of where the fire was located, how close it was to other burnable material like vegetation and fields, and ask what their permission source was to be able to burn during such a dry season (particularly leading into the 90° day tomorrow, and leaving it unattended). A homeowner would get in lots of trouble for leaving a fire not put all the way out that could reignite...”</p>	DSAC Chair	Not reported
54	9/28/24	Concerns about fire – Pacific Region Compost – relaying radio dispatches – "Passerby called, saw brown smoke coming from a compost pile near the back of the compost facility"	DSAC Chair	Not reported

55	10/13/24	Concerns about landfill odor – just N of Sarah Helmick park/Luckiamute, nose burning, had to stay inside	DSAC Chair	Not reported
56	11/30/24	Concerns about landfill odor – Dump day here at the end of Soap Creek Valley on 12/1/24 - Likely will continue each day all week with this stagnant air + fog.	DSAC Chair	Not reported
57	12/4/24	Concerns about landfill odor and toxic PFAS area contamination – “Considering the new research that shows that municipal landfills can release similar amounts of PFAS as is found in the liquid leachate -- one of the major sources of PFAS contamination in many areas -- escaped landfill gas is likely a hazardous material that may well pose a serious threat to human health and the environment.”	DSAC Chair	Not reported
58	12/13/24	Concerns about landfill odor – “Around 1:30pm Saturday Dec 14, passing the Coffin Butte landfill on Hwy 99... unbelievably bad! The smell permeated my car, and I felt queasy for a good half hour after arriving home.”	DSAC Chair	Not reported
59	1/2/2024	This is more of the usual stench that we in surrounding counties are being subjected to on an ongoing basis. Over the new year's holiday weekend the active dumping area was not covered as required, and this may have contributed to the strength of the odor. It was unpleasant to be outdoors. The annual Christmas Bird Count tallied >1,000 gulls feeding on the landfill in the uncovered trash.	DEQ	Not reported
60	1/12/2024	"horrible smell of the landfill"	Forwarded to RS from DEQ	Not reported
61	1/12/2024	Constant gas odors from coffin butte landfill, disturbing quality and health. I have lived here for 40 plus years and it's now intolerable	DEQ	Complaint is about the landfill odors getting worse in general. No specific incident or event.
62	1/13/2024	Offensive air pollution from the landfill. Not sure what else you want to know.	DEQ	1/23/24 - contacted source by email and forwarded complaint, with request for response.
63	1/16/2024	Rotting Garbage and Death smell is very present. Floating debris, garbage bags and chip bags entering animal pastures.	DEQ	Met with solid waste permit writer/inspector for the Coffin Butte Landfill. The landfill has fencing to trap wind-borne debris like bags to keep them from blowing off-site, as a requirement for their operations. Trucks bringing waste to the landfill are not owned or managed by the landfill, and can often be a source

				of wind-borne materials, as well as individuals discarding materials, so the landfill may or may not be the source of these.
64	1/18/2024	"Odor"	Forwarded to RS from DEQ	Not reported
65	1/18/2024	"incredibly intense"	Forwarded to RS from DEQ	Not reported
66	1/18/2024	"odor was very obvious"	Forwarded to RS from DEQ	Not reported
67	1/18/2024	"hits you like a wet blanket and permeates into the home as well"	Forwarded to RS from DEQ	Not reported
68	1/18/2024	"really bad"	Forwarded to RS from DEQ	Not reported
69	1/18/2024	I walked out our front door and was immediately hit by the stench of the landfill. While we often experience stench from the landfill, it's significantly worse today. One factor might be that the landfill has just re-opened, after being shut down over the holiday weekend and then due to winter weather conditions. So gases generated by garbage that have been building up under "daily cover" which was then capped by snow and ice are being released by renewed activity in the tipping area.	DEQ	Sent email with all 5 of the Jan 18 complaints to Ian, including the times reported. Waiting on response.
70	1/18/2024	I live several miles south of the Coffin Butte Landfill. The stench from the landfill is incredibly intense today. Difficult to breath. The source of the smell is unmistakable. I have smelled this smell at other times over the years, but it has never been this intense.	DEQ	Sent email with all 5 of the Jan 18 complaints to Ian, including the times reported. Waiting on response.
71	1/18/2024	Coffin. Uttebmandfill odor is consistent and permeates all the way to town of Corvallis, it's awfully going outside in your own neighborhood within miles radius. It hits you like wet blanket and permeates into the home as well	DEQ	Sent email with all 5 of the Jan 18 complaints to Ian, including the times reported. Waiting on response.
72	1/18/2024	The smell is really bad from Coffin Butte Landfill.	DEQ	Sent email with all 5 of the Jan 18 complaints to Ian, including the times

				reported. Waiting on response.
73	1/19/2024	"very apparent"	Forwarded to RS from DEQ	Not reported
74	1/19/2024	The landfill stink is very apparent today. Complaint forwarded to DEQ from LRAPA, email w/original complaint uploaded to documents - complaints intake SC	DEQ	Following up with Ian via email. Waiting on response.
75	1/22/2024	The odor from the Coffin Butte Landfill is getting increasingly worse. I am concerned for my family's health and safety.	DEQ	This complaint did not reference a specific event, but I will add this to the multiple-complaint follow up from January 18/19.
76	1/24/2024	<p><b>AIR QUALITY AND AIR STAGNATION ALERTS – LANDFILL METHANE EXCEEDANCES</b></p> <p>Since early November, the residents of Corvallis, Albany, Salem and Eugene-Springfield and surrounding rural areas have been subjected to multiple days of air stagnation weather patterns. During these periods of air stagnation, residents of Corvallis, Albany, Adair Village plus other small communities in the Linn and Benton county area have been experiencing acrid and chemical smells in the air, which are turning into health issues for people who have allergies and other respiratory issues. Residents researched and found that these smells are coming from the Coffin Butte dump and an EPA inspection of this particular disposal area was done in JUNE 2022. There was found massive methane leaks that violate air quality limits. It seems these might not have been addressed and the air quality has continuously worsened. Also, several eye witnesses living in Adair Village have recently witnessed open areas of waste NOT being covered (which it was found is a daily requirement per Republic Services permit). They have also witnessed seagulls (by the hundreds) scavenging the dump and found some of these birds dead in their neighborhoods shortly after that event.</p> <p>On Highway 20 at Independence Highway on Friday December 15 around noon, the smell from the dump was absolutely overpowering. Residents are being exposed to toxic air pollution from the landfill, especially residents in and around Adair Village, Logsdon Ridge, and North Albany. Over the past 3 months, many in our communities (very active dog walkers and neighbors who regularly interact outside) have curbed these activities, due to health issues breathing this offensive air. The rare break (when there is a slight breeze) finds all getting out in droves, as the air clears (but ONLY temporarily). People in our Watch are talking about the need for DEQ and Benton County to honor their mission and vision statements RE: air quality to Oregonians. Many have called and sent in complaints (like this one). However, it seems that local Republic Services administrations are not being held accountable for their neglect of environmental air quality in the</p>	DEQ	General complaint not in reference to a specific event. However, complainant is representing a neighborhood group. Additional followup needed, meeting with permit writer on Monday 2/5 as next step.

		Central Willamette Valley. There is talk of petitions and other actions by residents bring taken - if the situation continues further without resolve. I am sending this complaint on behalf of about 150 residences in only a portion of North Albany. We would think that the DEQ would honor all they claim to uphold for public air quality and would hold any business that is required to keep pollution at a minimum to account for local taxpayers. In past years, Wah Chang and the pulp plant in Millersburg were held to account when there was a continuing threat of pollution (danger to public health), so why not Republic Services? Something needs to be done soon, as taxpayers are getting upset with the lack of resolution to this ongoing situation. Redacted per ORS 192.355(4) Confidential Submissions		
77	2/3/2024	"Chemical type smell, Horrible"	Forwarded to RS from DEQ	Not reported
78	2/3/2024	"Strong smell of methane"	Forwarded to RS from DEQ	Not reported
79	2/3/2024	"foul chemical odor"	Forwarded to RS from DEQ	Not reported
80	2/3/2024	"nasty, horrible and probably not good for anyone to breathe"	Forwarded to RS from DEQ	Not reported
81	2/3/2024	"so strong"	Forwarded to RS from DEQ	Not reported
82	2/3/2024	There is a very strong smell of methane outside of my home. This odor is prevalent several days a week and has been growing worse over the last several months.	DEQ	Reported the 3 complaints from Feb 3 to Jan. Currently waiting on a response.
83	2/3/2024	I've reported this before but have yet to receive a reply. This is a frequent occurrence, whenever the wind is from the north. One factor making it a little worse today might be that large areas at the top of the landfill aren't covered by tarps, while they're supposed to be upgrading the methane collection system. Yesterday was windy and I noticed that the tarps were billowing and had come loose in several places on the east side, leaving new areas of exposed soil (or "daily cover") where landfill gases can escape.  I thought DEQ and/or EPA were supposed to be getting this outfit to clean up their act -- what's happening?	DEQ	Emailed Jan about the 3 complaints filed on February 3. Waiting on response.

84	2/8/2024	"strong"	Forwarded to RS from DEQ	Not reported
85	2/8/2024	The landfill smell is strong. When we first moved here in 2020 we would smell the landfill about every few months. It's been every other week for the last year. I don't know what is contributing to this, but it's awful.	DEQ	Forwarded complaint to Republic on 2/15/24, waiting on response.
86	2/8/2024	On both Saturday, February 3 and Tuesday, February 6 the smell from Coffin Butte landfill was so strong that it bothered us as we drove in the area.	DEQ	Forwarded complaint to Republic on 2/16/24. Waiting on response.
87	2/10/2024	"awful stench"	Forwarded to RS from DEQ	Not reported
88	2/10/2024	"stinky air" "especially bad"	Forwarded to RS from DEQ	Not reported
89	2/10/2024	Odor	Forwarded to RS from DEQ	Not reported
90	2/10/2024	We live by the land fill and the sticky days are happening more and more :(	DEQ	Forwarded complaint to Republic, waiting on response.
91	2/10/2024	I recognize this stinky air quality as odor from the Coffin Butte landfill. I live in the soap creek valley and the odor is often especially bad.	DEQ	Forwarded complaint to Republic, waiting on response.
92	2/10/2024	Republic Services Coffin Butte Dump.	DEQ	Forwarded complaint to Republic on 2/16/24, waiting on response.
93	2/13/2024	"the usual Coffin Butte stench"	Forwarded to RS from DEQ	Not reported
94	2/13/2024	The usual Coffin Butte Landfill stench. This time the odor was only present above 800 ft elevation, along Vineyard Mountain Ridge. The geography of the stink is very much dependent on local air mass movement and wind direction and strength.	DEQ	Forwarded complaint to Republic, waiting on response.
95	2/14/2024	"very bad"	Forwarded to RS from DEQ	Not reported
96	2/14/2024	"usual rotting garbage odor"	Forwarded to RS from DEQ	Not reported

97	2/15/2024	"extremely strong"	Forwarded to RS from DEQ	Not reported
98	2/15/2024	The landfill smell is extremely strong. This is not compost. The landfill has a distinct odor more chemical in nature. The issue has been getting progressively worse over the last several weeks	DEQ	Forwarded complaint to Republic on 2/23, waiting on response.
99	2/20/2024	"malodorous chemical smell"	Forwarded to RS from DEQ	Not reported
100	2/20/2024	"rotting garbage"	Forwarded to RS from DEQ	Not reported
101	2/20/2024	"usual landfill stench"	Forwarded to RS from DEQ	Not reported
102	2/20/2024	All day Coffin Butte Landfill odors. Moderate levels today, and have been present for the last 3 days (Feb 17-20). Basically smells like rotting garbage.	DEQ	Forwarded complaint to Republic on 2/23, waiting on response.
103	2/20/2024	The usual rotting garbage odor that emanates from Coffin Butte landfill. I first noticed it at my home in the morning. I drove to Albany around 11am and back around 2pm. I smelled the odor from my home, all along Soap Creek Road, Tampico Rd, through Adair Village to Independence Hwy. The odor dissipated soon after I turned onto Hwy 20 toward Albany. The odor was still present when I returned home around 2.	DEQ	Complaint is referencing February 14, which has already been reported and responded to. The additional complaint is being reported, but no additional information is being requested. Called and left a message at the number provided on 2/23 at 10:42 a.m.
104	2/20/2024	The odor was especially concentrated around 700-800 ft elevation, coinciding with the bottom of the cloud deck, but still present at 500 ft. As the fog lifts, the odor often dissipates.	DEQ	Forwarded complaint to Republic, waiting on response.
105	2/22/2024	"Stinks"	Forwarded to RS from DEQ	Not reported
106	2/24/2024	"Rotting stench"	Forwarded to RS from DEQ	Not reported
107	2/24/2024	"sour, reeking stench"	Forwarded to RS from DEQ	Not reported

108	2/25/2024	While driving north on Soap Creek Road prior to the Tampico Road intersection we put our autos air on recirculate and then shut the system off but it was too late the car was already filled with the highly offensive odors. We proceeded north to Hwy 99 and just had to wait it out until we got north of Republic Services Coffin Butte Dump. It is really concerning issue especially since so many people live in the vicinity of the Dump.	DEQ	Forwarded complaint to Republic, waiting on response.
109	2/27/2024	There was on 2/24 and still is a great deal of garbage strewn along Hiway 99 from Monmouth south to the Coffin Butte Landfill. It seems likely this is the result of debris falling off garbage trucks headed to the Coffin Butte Landfill. It is unsightly but also potentially dangerous for people who are walking along the road or getting their mail (or picking up after the garbage trucks).	DEQ	After a very long telephone conversation with the complainant, who advised "there was one spot that had about 5 large plastic bags, that had to have come from a truck headed to the landfill", but no one location, just scattered mess from Monmouth to Corvallis. Everything points to excessive roadway debris, I will be closing the complaint, unfounded.
110	2/29/24	For years I have witnessed garbage flying out of the Republic Services garbage trucks. Independence Hwy is disgusting, so does Hwy 99 and all adjacent roads. These used to be lovely roads with great views but it looks no better than a 3rd world country.  This has been brought up in the Next Door Neighbor app and I am not alone. Please read. <a href="https://nextdoor.com/p/G6-H2Fck_5Kd?utm_source=share&amp;extras=NDk2ODc1MQ%3D%3D&amp;utm_campaign=1709261818824">https://nextdoor.com/p/G6-H2Fck_5Kd?utm_source=share&amp;extras=NDk2ODc1MQ%3D%3D&amp;utm_campaign=1709261818824</a>	Email	Thanked respondent and logged complaint.
111	3/6/2024	"Reeking Stench"	Forwarded to RS from DEQ	Not reported
112	3/6/2024	This is my 2nd Environmental Violation complaint- Regarding non existent and/or lack of Daily Cover. Which is required by not only Title V air quality permit but also by Solid Waste Disposal Site Permit Municipal Solid Waste Landfill SWD P 306 Expiration Date June 30, 2030. My 1st complaint was forwarded to Oregon DEQ Western Region Hazardous/Solid Waste Permitting/Compliance 4026 Fairview Industrial Dr Salem, OR 97302. Mr. Hugh Gao was the first and only person to reply although he started to cc a Miss Becky Williams. I have to report that I feel my complaint wasn't taken seriously. Mr.Gao response was that he contacted the land regarding issue of daily cover and landfill provides us evidence that indicates the landfill is in compliance. My repeated questions about penalties went completely unanswered. Yet COMPLIANCE is half of	DEQ	According to information and photos provided by the permittee, a daily cover material was applied at the operation area of the landfill in compliance with requirements as specified in the SW permit. The landfill did not open in Sunday (Feb. 11,



		Mr.Gao's title (maybe the whole division's title). I find it absolutely unacceptable that repeated acts of noncompliance aren't penalized. Shortly thereafter without informing me Mr.Gao closed my complaint. In my opinion no action was taken. I am also not aware of any penalties levied. Above I checked Falsified in the Violation Method section since landfill stated to Mr.Gao that they are in compliance and these more recent photos evidence they are not. As mentioned above I believe this is both an air quality issue and also a Solid Waste Permitting issue hopefully you can take enforcement action on this issue. Attached photos taken February 11, 2024. I have a video that is too large a file to upload. By zooming in on the video you can see the large number of birds scavenging on the uncovered garbage		2024). A daily cover material was applied on Friday, 2/9/2024.
113	3/7/24	Coffin Butte water quality	Email	Darren asked Bailey to send this information to DEQ (done). Robert Orton's contact information was not included. Mr. Orton is a Republic employee and has given comment at a recent BOC meeting. Xan Augerot received a complaint that Republic Services is using water from the Knife River quarry which is a rock quarry that borders the Coffin Butte Landfill. The complainant is concerned that water that is collected in the quarry is being used to wash the roads around (in?) the landfill. Photos and video are documented here: G:\dev\Code Compliance\Files - Enforcement\2024
114	3/8/24	Coffin Butte odors	Email	Odor complaint. I've sent the Republic Services and DEQ complaint links.

115	3/8/24	Coffin Butte odors - Dump stench today(March 8,2024) 7:00 Am til around 11:00. The areas of concern, 27407 Writsman Creek Dr., Tampico / Trillium intersection and OSU 400 road. It was a pretty high concentration.	Email	Thanked her for contacting us and forwarded Republic Services and DEQ complaint lines. Comm. Augerot also sent the Coffin Butte complaint link.
116	3/8/2024	"5"	Direct Complaint to Republic Services - Ken Kupperman	Not reported
117	3/8/2024	"rotting garbage plus acrid chemical smell", level 8	Direct Complaint to Republic Services - Faye Yoshihara	Not reported
118	3/8/2024	Reeking stench	DEQ	Complaint completed as duplicate complaint - see complaint #2024-00491/41497 assigned to Laura McWhorter based on complaint proximity to Coffin Butte Landfill, Republic Services
119	3/8/2024	Went outside around 8:30 am to the typical rotting garbage plus chemical acrid smell we get when we drive by Coffin Butte Landfill. It was so strong that I abandoned my plan to go for a hike and I went back inside. Around 10:00 am was my last chance for exercise today and I know that sometimes the landfill odors change with elevation and wind direction. Our house is at 500ft. So despite the landfill smell being present with its signature acrid chemical smell, but reduced, I proceeded down to 350 - 400 feet where the smell was the weakest. It was still unpleasant, but not noxious as higher elevation. By the time I returned to my house around 11:30am, the smell was present, but minimal.	DEQ	Forwarded complaint to Republic, waiting on response.

120	3/8/2024	After reporting the signature Coffin Butte Landfill rotting garbage plus acrid chemical smell this morning, I wanted to add that a couple hours later when I went outside, a different smell that I associate more with PRC, was present at our house. It smelled more like silage and rotting organic matter. While I am not 100% certain the smell is from PRC, I will note it as "yes" below, as I believe this is the most likely source. I am only reporting to differentiate the smells we get from both the Landfill and PRC facilities, generally on different days. Today we got both. Some days, I drive to PRC so I can follow the smell to the source, today I did not have time to do this.	DEQ	3/15: Craig Filip (CF) received notification of this complaint via email at 1422 on 3/14, even though it was reported on 3/8. CF emailed Ian Macnab with Republic Services, Inc. about this issue. Mr. Macnab responded today, as did Operations Manager Broc Kienholz, that there were no complaints reported to them and no system upsets or other issues they could identify. CF called the complainant to convey this information, along with his contact information
121	3/10/2024	Noticed early morning Friday 3/8 on Tampico, drove 5 miles soap creek with ongoing odor, drove back Tampico and to CHS odor intensified throughout day. Some days worse than others, it is increasingly consistent	DEQ	Forwarded complaint to Republic, waiting on response.
122	3/12/2024	"landfill odor with a noxious chemical component"	Forwarded to RS from DEQ	Not reported

123	3/15/ 24	<p>Bailey's comments in <a href="#">blue</a>.</p> <p>Dear Bailey, Can you and Benton County work to find a better way for Rep. Ser. to provide a best management practice bill for residents in Benton County? My residential trash pick up and recycling bill lets me know nothing about what I am paying for. I'm not sure what influence Benton County has on this, but I'll certainly pass along your feedback. You can also send these comments to them directly here. As you probably know, Republic Services is a national company and their billing is out of their Phoenix office and I'd guess their billing to be similar for all of their nationwide accounts.</p> <p>I am interested in what Benton County Public Works does with the payment funds they get from Rep. Ser. from the public in their trash bill? I'm new to Benton County, but I believe that these funds go into the Benton County general fund, some of which is used to fund our department's programs.</p> <p>I am interested in what the recycling fee does and why? I'm not certain of this, but I'm guessing that a recycling fee may have been added some years ago to help recycling companies reduce contamination. I could be wrong as I'm not sure what the "recycling fee" is.</p> <p>Where do comingled recyclables go and does all of this material get reclaimed? The materials initially go to Republic Services' facility in Albany. The comingled recyclables are baled for more efficient shipping and sent to a Portland area material recovery facility where they separate the recycling into different materials and grades. From there, the recycling goes to manufacturers that buy it as a raw ingredient for their manufacturing of new products.</p> <p>Does recycling all go to Salem to Garten Foundation to be sorted? I think it depends on the market. It could go to Garten Services in Salem or one of the 6 or so MRFs in the Portland area, depending on what they pay and how much material they need.</p> <p>How is comingled recycling working, or is it failing or is generating more waste or is too cost prohibitive to work as comingled reclamation the few of materials we can put in the recycling bin. Should return to sorted recycling to save more materials from being landfilled? The comingled collection system has been a double-edged sword. On the one hand, it's increased recycling by about 30% which is great. The downside is that people too often put in things that aren't part of the collection system. Things like Styrofoam, hoses, plastic bags and other contaminants have increased which has also put a real strain on the system. Recycling markets took a big hit several years ago which compounded the problem. Ultimately, the best solution is to have the material used domestically, ensuring stable markets for the recyclers. Sometimes processors will run the material a second time to improve how much they're recovering, but as technology improves, these MRFs should be able to better handle it. In the meantime, it's important</p>	Email	Bailey responded (see blue text)
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		<p>that people “recycle right.”</p> <p>What percentage of our residential trash bill goes directly to an account for paying for the closing and maintenance for x years, of the landfill? I’m not sure about the percentage, but the Oregon Department of Environmental Quality requires that landfills have a fund set aside for closing the landfill and mitigating future environmental problems that could arise. I know that this is a topic that our solid waste committee will focus on.</p> <p>Rana, it sounds like you may enjoy taking the Master Recycler class. It’s a great way to learn all about waste prevention, recycling, composting and disposal. Here’s a link. You may also find these videos of interest:</p> <p>Saving Little Pieces of Our Earth: Your Curbside Recycling Journey How a Material Recovery Facility (MRF) Works – This is an excellent video that shows the process. One thing to note is that many programs include glass in the commingled. In Oregon we fortunately don’t do that (glass shards are really bad for paper recyclers), so glass is collected separately.</p>		
124	3/15/24	Website links don't work	Email	Debbie was frustrated that the links in the BCTT Final Report do not work. Sent Debbie the link to the old website that has the list of links to the solid waste documents that had been listed on the website and assured her that the links will all work again once our website has been revamped.
125	3/18/24	Coffin Butte odors	Call	Bailey acknowledged his complaint.
126	3/21/2024	<p>Original complaint received as email by DEQ HOT Support: Hello my name is Eric Nittka, I live at 28709 Robison Rd, Monmouth, OR 97361. I've been a resident in that location for the last 12 years. The smell from the landfill was only a problem once in a great while for the first 10 years just in just this year we are consistently smelling stink from the landfill day, night, afternoon. I'm not sure why but it's getting bad.</p> <p>Problem number 2.</p> <p>The trash along the roads and highways leading to the landfill are always littered with trash. There's supposed to be a covered load ordinance, that's not being enforced. The landfill is greatly effecting the livability of our community.</p> <p>Please respond to me with what action will take place to see this is corrected.</p> <p>Thank you for your time.</p>	DEQ	Regarding the odor portion of the complaint, I called and left a message with the complainant. The complaint about the trash blowing out of the trucks is related to solid waste rules, so I am also reassigning the complaint to them.

		Sincerely Eric Harry Nittka Original email uploaded to documents - complaint intake SC		
127	3/23/2024	"foul/gassy, for two hours"	Direct Complaint to Republic Services - Kate Schoenhals	Not reported
128	4/1/24	Coffin Butte odors	Email	Mark emailed the Benton County leadership and cc'd me complaining about the dump odor and asking how we're planning to hold Valley Landfills accountable. Commissioner Augerot responded.
129	4/1/24	Coffin Butte odors	Email	Commissioner Augerot forwarded her complaint for my records.
130	4/1/2024	Power of odor: 10	Direct Complaint to Republic Services - Elizabeth Patte	Not reported
131	4/1/2024	"incredibly bad", 10	Direct Complaint to Republic Services - Vicki Druliner	Not reported
132	4/1/2024	10, "smells like rotten eggs. But worse. More chemically."	Direct Complaint to Republic Services - Nathalie Sutherland	Not reported
133	4/2/24	Road damage (potholes) causing hazard for traffic at posted speed limit. Inde hwy from landfill to Hwy 20	Call	Sent compaint to PW (PWinfo@bentoncountyor.gov)

134	4/5/24	Numerous pot holes caused by the heavy truck traffic from Knife River.	Email	Emailed complaint to PW (PWinfo@bentoncountyor.gov) and responded to complainant.
135	4/8/24	Coffin Butte Litter	Call	Bailey provided Craig Filip with Chp. 23 covered loads language and contact info for Kenny Larson. Craig Filip, Oregon Department of Environmental Quality, left a voicemail today. Mr. Filip said his office has received complaints about "trash being strewn on the road to and from the Coffin Butte landfill" and he would like to know if Benton County has a covered load ordinance for road transportation of materials. If the answer is yes, he would also like to know what the code citation is and who is responsible for enforcing such a requirement.
136	4/12/2024	"overpowering landfill stench"	Forwarded to RS from DEQ	Not reported
137	4/12/2024	<p>This happened both yesterday and again today. Overpowering landfill stench as I came out of my house in the morning. I was driving out to do bird surveys so I went right by the landfill and noticed that there are still huge areas up top with no tarps, in the same area where EPA inspectors found 60+ violations of methane emissions a couple of years ago.</p> <p>This is extremely frustrating -- this landfill is in violation and there have been many reports, but we're not seeing any action by DEQ.</p>	DEQ	Forwarded complaint to Republic, waiting on response.

138	5/2/2024	"Strong odors"	Forwarded to RS from DEQ	Not reported
139	5/2/2024	This just keeps happening, whenever a breeze is blowing from the north. By 7 pm the landfill is supposed to be closed for the night, so this could be an indication that they didn't adequately cover the working face, and/or that they still have a problem with leakage through their tarps. Lately I've noticed that larger areas that used to be covered by tarps are uncovered.	DEQ	Forwarded complaint to Republic on May 6, waiting on response.
140	5/23/24	A beautiful morning in Soap Creek Valley with an overwhelming dump stench hanging in the air!	Email	Sent complaint links to Republic Services & DEQ
141	5/23/24	<p>Wanted to report this to you so you knew this goes on... For the first time (for me, anyway), I smelled the dump from right outside my own home. I live a good five miles away from the dump and am surrounded by a lot of trees which usually keep the air clean, but not this morning! My husband went out for a morning walk and texted me he smelled the dump. I hadn't been outside yet, so stepped out my front door and could smell it from my deck. This was at about 7:45am (Thurs 5/23/24). The smell actually began to make me feel queasy so I went back inside. I heard from a number of neighbors that they smelled it too. The landfill operators are supposed to keep odors in check but do not. It is truly scary smelling the dump (especially at your own home!) because we do not know what all pollutants we are taking into our bodies. And it is very disturbing that if you don't want to breathe those unknown things in, you feel like you have to avoid going outdoors until the "coast is clear."</p> <p>This is one of the many reasons a landfill like this should not be located so close to populated areas. When we moved here nine years ago we were given the impression that the landfill was almost full and so would be closing in the near future. On the landfill's own website in their FAQ they describe the process of how the landfill will be closed when it is "filled to capacity" so we were comforted by that. But clearly this is misleading, as they will continue to expand this dump forever if the County allows it to. I know this now, but did not when I moved here.</p> <p>I have made my complaint to DEQ on their form (about this morning's odor), but wanted to be sure you were aware as well. Do you keep a log of landfill complaints, by any chance?</p>	Email	Documented complaint and sent DEQ & RS complaint forms.
142	5/23/2024	"smell of Garbage" overwhelming	Forwarded to RS from DEQ	Not reported
143	5/23/2024	smell the dump	Forwarded to RS from DEQ	Not reported
144	5/23/2024	"coffin Butte's effluence"	Forwarded to RS	Not reported



			from DEQ	
145	5/23/ 2024	"trash and rotten egg"	Forward ed to RS from DEQ	Not reported
146	5/23/ 2024	I live approximately 5 miles south of the Coffin Butte Landfill and I needed to drive to my rental house in Adair Village this morning. I could smell Coffin Butte's effluence the entire drive to Adair. Although I smell their odor in the air once a month or so, today it was bad enough that my eyes began to sting and I had to go inside as soon as I could.	DEQ	Forwarded complaint to Republic on 5/28, waiting on response. Multiple complaints were reported on this date, including one reported directly to the landfill and forwarded to DEQ.
147	5/24/ 24	The smell this morning (8:15am) is not as intense as it was yesterday. But still noticeable	Email	Documented complaint
148	5/24/ 2024	Wednesday morning the smell of garbage from the Coffin Butte Landfill was overwhelming.	DEQ	Forwarded complaint to Republic on 5/28, waiting on response. Multiple complaints were reported on this date, including one reported directly to the landfill and forwarded to DEQ.
149	5/24/ 2024	I live near the Coffin Butte Landfill and the odor of trash and rotten egg was incredibly strong at my house, definitely NOT a compost smell.	DEQ	Forwarded complaint to Republic on 5/28, waiting on response. Multiple complaints were reported on this date, including one reported directly to the landfill and forwarded to DEQ.
150	7/12/ 2024	"landfill smell"	Forward ed to RS from DEQ	Not reported
151	7/22/ 24	It is long past time to address the overuse of the Coffin Butte landfill by municipalities across Oregon and Washington. It should be designated and operated as a regional landfill. At its current intake rate it will become a Superfund site which is not the legacy you should be leaving. With the CUP application now on file, please make the call as elected leaders of Benton County to restrict any expansion to future use for Benton County only.	Email	Sent her information about DSAC and ENRAC and let her know that there will be ample opportunity to provide public input.
152	7/24/ 2024	Noticeable unpleasant methane odor	Forward ed to RS from DEQ	Not reported
153	7/24/ 2024	Trash flew over the buffer property and was dropping on our property and adjacent properties. I have pictures of it in the air. Doritos bag landed on my property. Plume of something was	DEQ	7/30 - Forwarded complaint to

		moving towards my residence on SE corner of landfill buffer property		Republic, waiting on response.
154	7/26/2024	<p>A semi tractor-trailer (Oregon "HV" license plate number 78149 on the trailer, logo on the truck cab said "Ray Trucking / Dallas OR") left the landfill via Coffin Butte Road at 13:45, turned northbound onto Highway 99W, and left a long trail of plastic, paper, and other trash which was blowing out the back end of the truck. Within the first mile the stream of trash was almost constant with 5 to 10 pieces in the air at a time, then gradually diminished but trash continued to fly out even after the truck passed Suver Junction and Old Fort - Helmick Road, all the way to the outskirts of Monmouth where the truck slowed down. Altogether I'd estimate 150 to 200 pieces of trash, which fluttered off into the ditches and into nearby fields.</p> <p>On my return trip from errands in Monmouth about 45 minutes later, I noticed that a field of green beans belonging to Green Spring Farms (see <a href="http://www.greenspringfarms.com/contact/">http://www.greenspringfarms.com/contact/</a>) was full of similar litter 10 or more rows out into the field, on the east side of Hwy 99W south of Suver Road.</p> <p>It is very common to see trash flying out of trucks as they leave the landfill, but usually I don't manage to get identifying information (On many trucks that haul to the landfill, the license plates are covered in grime and unreadable, though Wheat LLC is another frequent offender).</p> <p>There seems to be a general problem that drivers are not stopping to clean out their trailers before they leave the landfill. I complained about this directly to the Benton County Disposal Site Advisory Committee, DSAC, in 2021 but Republic Services' representative to DSAC at that time, Ian MacNab, claimed that they have stations for truckers to stop and clean out their trailers before leaving. Obviously that practice is not being followed with any consistency.</p>	DEQ	
155	7/30/2024	"landfill dump smell"	Forwarded to RS from DEQ	Not reported
156	7/30/2024	Landfill dump smell from coffin butte landfill	DEQ	8/6 - Forwarded complaint to Republic, waiting on response.
157	8/1/2024	On 7/25/2024 observers repeatedly witnessed large plumes of particulate matter drifting off site towards the southwest where numerous homes and businesses are located on rural residential, forest conservation, and exclusive farm use land. Commercial trash hauling trucks and much larger semi trucks kicked up particulate matter in two ways. 1) When trucks ascended or descended the gravel road up to the top of the landfill, they kicked up dust from the gravel road itself, particularly when rounding a corner. 2) When semi trucks with hydraulic lifts deposited trash loads onto the	DEQ	Not reported

		<p>landfill's working face a plume of particulate matter emerged from the loads and traveled for a considerable distance to the southwest.</p> <p>These particulate matter plumes appear to be in violation of the operator's Title V permit which requires particulate matter suppression on both the gravel roads and working face depositions.</p>		
158	8/1/2024	<p>On 7/24/2024, a grass fire was started next to the landfill gas flares of Coffin Butte. This grass fire threatened several nearby residential structures and had numerous response barriers for local first responders from the Adair Village and Corvallis fire departments. First responders noted the fire likely was started by debris coming from the open flares. This would not be the first time such an event has occurred (see attached document page 3 paragraph 3. Note the reported fire in this document occurred prior to November 2023)</p> <p>Although fire response is beyond the scope of DEQ, the maintenance and operation of the flares are regulated by the Title V permit. The open flares are an air quality and fire hazard issue. Coffin Butte Landfill still has two open flares in active use, which appears to be in violation of ORS 340-239-0110 (2). Our complaint is directed at the DEQ and the fact that Republic Services, owner of Coffin Butte landfill, is not required to comply with ORS 340-239-0110 (2).</p>	DEQ	Not reported
159	8/4/24	Upset that CB charges "environmental fee" to in-County residents	Email	The receipts documenting the overcharges for the environmental fee were from before the 2021 franchise agreement that states that this fee will not be charged to BC residents.
160	8/4/2024	dump stench	Forwarded to RS from DEQ	Not reported
161	8/8/2024	"dump smell, like driving by", "10"	Direct Complaint to Republic Services - Ryan Griffin	Not reported
162	8/8/2024	Power of odor: "9"	Direct Complaint to Republic	Not reported

			Service s - Lauren Griffin	
163	8/9/2 024	Piercing garbage smell	Forwarded to RS from DEQ	Not reported
164	8/9/2 024	"terrible smell"	Forwarded to RS from DEQ	Not reported
165	8/9/2 024	The smell of the Coffin Butte landfill is sitting on top of our property. A piercing garbage smell. My son and I stopped playing outside after the smell approached.	DEQ	Forwarded complaint to Republic on 8/16, waiting on response. Multiple complaints were reported for this date.
166	8/9/2 024	Terrible smell from coffin butte landfill	DEQ	Forwarded complaint to Republic on 8/16, waiting on response. Multiple complaints were reported for this date.
167	8/18/ 2024	"smells like driving by the dump", 8	Direct Compla int to Republi c Service s - Ryan Griffin	Not reported
168	8/21/ 2024	Dump stench from Coffin Butte Landfill	DEQ	Emailed complainant, waiting on response.
169	8/23/ 24	<p>From: allysonkhand@gmail.com Subject: Coffin Butte expansion project</p> <p>Hello,</p> <p>I am writing to inform you of the ongoing issue of the Coffin Butte landfill expansion. Plans have been underway for expansion, despite the actual need to expand. The county is not regulating the expansion. The landfill is still able to receive waste for many more years to come. Yes, it is filling up, but does not require immediate action to resolve.</p> <p>Republic Services has been fined millions of dollars in the past for environmental pollution. Republic Services announced a "pre application meeting" with Benton County Planning Division. The meeting was scheduled for last night and the public was NOT invited. No public were allowed, not even to observe. It is concerning to see this project be able to have a meeting without having to be transparent with the people the expansion will affect the most.</p>	Email	Encouraged Ms. Hand to submit her concerns about Coffin Butte once the CUP is open for public comment.

		<p>The project needs oversight. This project needs to stop. Republic Services needs to be held accountable. The Willamette Valley is full of sensitive ecosystems. The expansion of a landfill only threatens people, wildlife, and the environment.</p> <p>Please look into this. Please hold Republic Services accountable. Cheri Brubaker, Field Representative U.S. Representative Val Hoyle OR-04 Mobile (202) 834-3336</p>		
170	8/23/24	<p>August 4, 2024 8:30 -10:00 AM the smell was present. I was heading to Airlie, and first noticed it at the intersection of Soap Creek and Tampico, it persisted til I reached the 300 RD of OSU Forest. On returning home around 10:00 It was permeating the air at our home.</p> <p>August 21, 2024 7:00 - 10:00 the smell was potent!</p>	Email	Responded to the complaint about the landfill odors.
171	8/23/2024	"landfill chemical stink"	Forwarded to RS from DEQ	Not reported
172	8/23/2024	Earlier today the wind was from the south (from our house toward the landfill) so we weren't smelling the odor. But after a weather front passed through this afternoon, the wind is now from the north, so we're smelling the typical landfill "chemical" stink.	DEQ	Forwarded complaint to Republic, waiting on response.
173	8/27/24	<p>I am very much against the proposal. Before you get stuck in the weeds of all the guidelines you are supposed to focus on or disregard, ask yourself- Do you really want to be one of the people who, because of money, opened the door to degradation of the land, water, and air in our region? I have read the information on the VNEQS website, which makes it clear that NO ONE has the resources to correctly purify the leachate coming from the landfill, to make it safe for wells or for the Willamette River, the water source for many communities. In addition, in spite of systems to collect methane gas, there is still air pollution above and around the landfill area.</p> <p>It particularly shocks me that Republic Waste is wanting no restrictions on the amount of waste that it can accept in the future. Also that they are allowed to define what is a hazardous effect for adjoining lands.</p> <p>There are no simple solutions. However, I hope there are ways to restrict the amount of waste that Republic can continue to collect from all over Oregon. At the very least, Republic should be required to build a state of the art pre-cycling center to make sure that less material enters the landfill in the first place (similar to what Lane County is doing at this time). At the very least, there needs to be required close monitoring of toxic materials that are already leaking beyond the boundaries of the landfill (with arsenic as an easy way to signal an alarm for surrounding wells and water).</p> <p>I'm sure if there were a vote on this, Benton county citizens would vote it down! You as our elected representative are supposed to represent our interests. Please use your conscience as well as your head to look at the situation. Thank you for your attention.</p> <p>From Larky Hansen, 6780 NW Mountain View Dr., Corvallis, OR</p>	Email	Commissioner Augerot responded.

		97330 (Not close enough to have my well or air quality affected, however close enough to care about fellow citizens, including citizens of Adair Village who get their water only a few miles north of the Corvallis Wastewater facility).		
174	9/11/24	Kevin expressed concern about the potential for wildfires to come to the Coffin Butte Landfill and fires that start at the landfill	DSAC Meeting	This came as a public comment to the DSAC at their meeting on 11/11/24. The committee discussed his concerns and deliberated on next steps.
175	9/11/24	<p>Community member, Kate Harris, opened the discussion by referring to a KLCC article published approximately one month ago, which mentioned assurances from Republic Services regarding robust monitoring and emergency management systems in place at Coffin Butte Landfill. Harris expressed concern that, despite these assurances, in real-life situations such as a recent fire, external observers (such as motorists) were the first to notice fires, which suggests a failure of the early monitoring systems.</p> <p>Harris quoted an SES Engineering Risk Assessment, noting that operators believed the flare may have caused a fire by igniting nearby grass. As a precaution, Republic Services created a gravel-covered buffer between the flare and grassy areas, which was believed to prevent further fire incidents. However, the fire in the summer of 2024 proved otherwise. Harris reiterated that Republic had provided multiple assurances that their fire prevention systems were adequate, but real-world incidents suggest these systems are failing. Harris suggested the need for a third-party, independent risk assessment (not funded by Republic) to provide an unbiased view of the existing risks at the landfill. Harris also noted a discrepancy in the report, which stated that no history of wildfires existed near the landfill. However, there was a wildfire in July 2023, just west of the landfill, disproving this claim.</p>	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/11/24. Republic Services representative responded in the meeting.
176	9/11/24	Concern regarding Republic's expansion plans for Coffin Butte Landfill, especially regarding fires crossing Coffin Butte Road. Highlighted the increasing wildfire risk due to climate change and wind events, which could lead to embers affecting nearby properties and Adair Village.	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/11/24. Republic Services representative responded in the meeting: Landfill material is sometimes covered with tarps, not dirt. Community concerns were raised over fire risks associated with this practice. Republic emphasized

				their commitment to safety protocols, including reduced working face areas, availability of water, and rapid response times. They disagreed with the assertion that fire risks are increasing.
177	9/11/24	Inquiry into whether Republic has updated their safety protocols in response to climate change and increased fire risks. Republic has not made specific updates addressing climate change but follows standard protocols, including keeping buffer areas mowed and maintaining safety standards	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/11/24. Republic Services representative responded in the meeting
178	9/11/24	Morrell raised concerns about a poorly managed Douglas Fir stand near the landfill, which poses a fire risk.	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/11/24. Republic Services noted that they would look into thinning the stand as previously recommended. There was a debate on the relevance of forested areas and other properties near the landfill in the context of fire prevention planning. Some committee members questioned if fire risk in non-landfill areas should be considered within the landfill's fire management scope. It was agreed that understanding the broader scope of land management, including forested and farmland areas, is necessary for comprehensive fire prevention planning.

179	9/11/24	Kevin Kenaga expressed dissatisfaction with the lack of public notification about the meeting. He mentioned that he had to personally reach out to the chair to learn about the meeting date. Kevin emphasized that the lack of communication undermines the committee's ability to fulfill its mission of fostering community dialogue and engagement. Kevin expressed concern over possible misinformation about the materials used in the landfill, particularly a statement that the polyethylene liner was not plastic.	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/11/24. This was clarified by Republic Services staff as a misunderstanding, confirming that high-density polyethylene is indeed plastic.
180	9/11/24	Ecklund expressed long-standing systemic problems in how the DSAC and related activities are communicated, with cancellations and changes to meeting schedules without adequate notice.	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/11/24. Bailey agreed to better promote future meetings.
181	9/17/24	<p>I read Ken Eklund's letter to the GT editor today, asking for input. I have some.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p>	Email	I thanked him for his input and suggested that he submit public comment during the public comment period which hasn't opened yet.



		Turn down the expansion (I have a yard sign!). Michael Schuyler		
182	9/19/24	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.	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/11/24.
183	9/19/24	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.	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/19/24. 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.
184	9/19/24	Expressed concerns regarding worker safety at Coffin Butte Landfill, referencing the August 6th Benton County Commissioner meeting and a recent OSHA inspection. Raised numerous questions (see 9/19/24 meeting minutes)	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/19/24. Republic Services responded in the meeting.
185	9/19/24	Raised the question of the costs to Benton County for hosting the landfill, including: <ul style="list-style-type: none"> <li>o Road degradation, pollution, and landfill fires.</li> <li>o Decrease in land values near the landfill.</li> <li>o Post-closure costs.</li> </ul> <ul style="list-style-type: none"> <li>• Requested any available reports addressing these costs.</li> </ul>	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/19/24. Staff researched if such a study exists and it does not. 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.
186	9/19/24	Commented on the updated Coffin Butte Annual Report, specifically regarding new testing for the flare at the landfill. <ul style="list-style-type: none"> <li>• Kevin Kenaga inquired about the testing procedure: <ul style="list-style-type: none"> <li>o What is being tested?</li> <li>o When will the testing be available to the public?</li> </ul> </li> </ul>	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 9/19/24. Response from Republic

				<p>Services:</p> <ul style="list-style-type: none"> <li>o Testing is scheduled for October 22.</li> <li>o It is a standard procedure for flare or industrial devices to have initial source testing.</li> </ul>
187	9/19/24	<p>Kevin Kenaga raised concerns about the daily cover at the landfill:</p> <ul style="list-style-type: none"> <li>o 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.</li> <li>o Kevin criticized the accuracy of the report and emphasized the environmental impact of not using adequate daily cover, including increased methane emissions</li> </ul>	DSAC Meeting	<p>This complaint came as public testimony at a DSAC meeting on 9/19/24. Republic Services Response:</p> <ul style="list-style-type: none"> <li>o 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.</li> </ul>
188	9/20/24	Complaint about exceptionally long line at Coffin Butte with 25-30 commercial trucks slowing the line down. Waited 45 min. before getting to the scale house.	Call	Called Rob and discussed the issue. Let him know that I'll send this complaint to Republic Services.
189	10/1/24	Upset that CB charged out-of-county rate because she came in a F350 truck with a u-haul back. Feels that this should have been charged the Benton County rate. She provided receipts documenting the "environmental fee" that should not be charged to Benton County residents.	Email	<p>Asked Petra about the issue of charging an "environmental fee" to BC residents. Our contract with RS states that these fees should not be charged to BC residents. Update: The vehicle size she had doesn't qualify for the discounted rate. Bailey asked Republic to make a sign indicating what vehicles do and do not qualify. They've posted the sign and added the information on their website.</p>
190	10/8/24	Hi! I'm not very good at computers, so hope that you get this message. I believe that the Benton County land fill shouldn't be for numerous other counties(other than maybe a few adjoining ones like Linn which maybe should pay something for access to it) who	Email	Bailey emailed her instructions on how to sign up for Coffin Butte permit

		don't want a landfill in their back yard and would rather we shoulder the environmental burden. If Republic wasn't taking all that other outside trash, the land fill would be able to function until the quarry is available for expansion. I have found Republic's service to be great, but they are being greedy for additional business at our expense. The new contract should restrict where the waste comes from.		application updates and how to provide public comment.
191	10/9/24	Mark Yeager, a Benton County resident, raised concerns about Republic Services' construction of a landfill expansion into the quarry site. He emphasized that this expansion, according to Benton County Code Chapter 77, requires a conditional use permit, which he believes has not been obtained. Yeager questioned whether DSAC was aware of the construction and if they had any comments on the issue.	DSAC Meeting	This complaint came as public testimony at a DSAC meeting on 10/9/24. Ian McNabb (Republic Services representative) responded, confirming that the construction in the quarry had been publicly discussed in previous meetings and open houses.
192	10/9/2024	There was a great amount of litter on both sides of Hiway 99 between the north and south entrances to Arboretum Rd. It really looked like no one was maintaining the highway margins. I believe a lot of this garbage has escaped from garbage trucks going to Coffin Butte Landfill. I think this roadway should be kept neat and clean.	DEQ	
193	10/17/2024	Landfill stench was once again affecting recreation on E.E. Wilson Wildlife Area. With a breeze from the SW on this date, the most strongly affected area was NE of the landfill, starting from north of the archery range (about 150 yards south of the CPI substation) and for about the next 1/4 mile north of there.	DEQ	Forwarded complaint to Republic, waiting on response.
194	11/5/24	Resident sent a letter with newspaper clippings about Coffin Butte. Concerns included accepting waste beyond Linn and Benton Counties and resulting truck impact on roads.	Letter	Read the letter and reviewed the newspaper clippings. Shared the letter and clippings with DSAC (10/9/24 Meeting Minutes)
195	11/8/24	<p>I am writing to report alarming air quality violations that occurred this week originating from Coffin Butte Landfill.</p> <p>On the evenings of Monday November 4th and Wednesday November 6th, I was exposed to concerning levels of methane while commuting home from work. My route takes me onto Camp Adair Road from the Independence Highway, then north on Highway 99 and onto Robison Road where my residence is located approximately 1.5 to 2 miles northwest of Coffin Butte. The timeframe of my commute has me driving through the area at approximately 5:30 to 5:45. The methane scent became noticeable as soon as I turned off Independence Highway onto Camp Adair Road, increasing in strength so that by the time I was driving past the landfill on Highway 99, the methane concentration was strong enough to give me a headache. The methane was still discernable</p>	Email	Documented odor complaint and sent complainant the Coffin Butte complaint information and the DEQ report form.

		<p>when I parked my car at my residence approximately two miles northwest of the landfill.</p> <p>It is a huge inconvenience to have to write this email, and I want you to understand that there have been many more times when I should have made similar reports, but just didn't have the energy or time. This evening I could smell methane when doing chores outside my home, so I knew I had to take the time to report what has been occurring.</p> <p>In addition to the air pollution, Tuesday night Camp Adair Road was largely covered by hazardous masses of pink fiberglass insulation that I believe were part of an uncovered load heading to the landfill. In addition to posing danger to drivers along the road that evening, the insulation migrated to the vegetation where it is now scattered for hundreds of yards along the roadside ditches. This has to pose an environmental hazard for flora and fauna in the surrounding farmlands and the E.E. Wilson Wildlife Area. The quantity of landfill-related waste littering the local roadways and roadsides is deplorable, and Republic Services should be required to provide litter clean up every day.</p> <p>The ongoing collateral damage of the landfill is both alarming and saddening to those of us who are exposed to it on a daily basis. In my opinion, Republic Services does not deserve to do business in Oregon because they are a persistently irresponsible organization posing many hazards to the health and well-being of residents living in the vicinity of the landfill, as well as to the surrounding farmlands and their nonhuman inhabitants.</p> <p>Less waste is the answer we require for a healthy future, not more landfills. My neighbors, my family and I therefore thank you for everything you can do to hold Republic Services accountable for their egregious behavior toward the local environment, and for any assistance you can offer to protect your constituents from future landfill expansion.</p>		
196	11/17/2024	<p>Multiple problems at Coffin Butte Landfill today:</p> <p>(1) Very strong landfill stench impacting public recreational use of the Coffin Butte Annex of E.E. Wilson Wildlife Area. Overwhelming in the trailhead area.</p> <p>(2) Tarps all along the SE flank (especially right along SE corner of the "pyramid" formed by the newest landfill cell, from mid-slope up to near the top) visibly inflated by landfill gas, forming bulges in the tarp, except where held down by weights (sandbags). Not due to wind billowing, except in one ~15 foot section lower down that was moving with variations in the breeze, where the tarp had pulled loose exposing a bare patch of cover dirt perhaps 5 x 10 ft wide. Above that the tarp formed a series of taut bubbles that were not moving at all. This is in one of the areas where an EPA inspector observed similar inflation of the tarps, indicating positive pressure from below by landfill gas that is not being captured by the gas-</p>	DEQ	Forwarded complaint to Republic. Response received from Republic. See attached document. Emailed a response, including the attached document, to the complainant as well.

		<p>capture system.</p> <p>(3) On the southwest side, before today's rain started up, there was water/leachate streaming out of multiple holes in the tarps on the south-facing slope of the landfill, above the first gate west of the scale house road (above Monitoring Well 23 which has registered high arsenic levels during past seepage events. Some of this may have been runoff from water pooled on a bench higher up, but in several places it was coming out through holes in the tarps, and the tarps were dry above these leakage points. I'd estimate the flow from the biggest stream of seepage at about 15 to 20 gpm. This eventually all goes into a ditch which flows into E.E. Wilson Wildlife Area and is used as the source for a popular fishing pond. Knowing that leachate is high in arsenic as well as PFAS and other toxins, this is an environmental health concern. Many of these holes in the tarps have weeds growing through them, showing that they've existed for a long time.</p> <p>(4) When I checked on the back side of the dump as viewed from Wiles Road and Coffin Butte Road, I could see a large area of garbage at the tipping face that was uncovered, drawing a swarm of 400+ "sea" gulls and an estimated ten thousand of invasive European Starlings. The landfill operators are not supposed to leave trash uncovered over the weekend (this was on a Sunday morning when the dump is closed). Recently they've been pulling a tarp over the tipping face and I could see a tarp up there, but either it wasn't properly deployed or it wasn't properly secured.</p>		
197	11/19/24	<p>I live approximately 2 miles northwest of Coffin Butte Landfill. In the early hours of morning today there was a nauseatingly strong methane odor emanating from Coffin Butte landfill. When I went outside tonight at approximately 8:15, the odor was again strong enough to force me back into the filtered air of my home. The frequency and intensity of the methane pollution is increasing.</p> <p>This methane pollution is more than a nuisance to those living within range of the smell. I believe Coffin Butte Landfill poses serious environmental and public health hazards. I further believe Republic Services should be held accountable for what I see as crimes against the local environment and its inhabitants, be they human or otherwise.</p> <p>Below is a forwarded email with a similar report I made dating from the week of November 8th. For the record, remnants of the insulation spill I mention in that report can still be seen along Camp Adair Road today. It is important that Benton County Commissioners read that complaint since they were not included in the original email.</p> <p>Thank you for your consideration and support in this matter. Your constituents are trusting that our elected officials will act with integrity to protect the public from the bad-faith practices of Coffin Butte Landfill and Republic Services.</p>	Email	Documented odor complaint and sent complaintant the Coffin Butte complaint information and the DEQ report form.

198	11/20/2024	I like 1.5 miles from coffin butte landfill. The sink from the landfill is very noticeable at least 2 times a week lately	DEQ	Forwarded complaint to Republic, waiting on response.
199	11/26/24	Heavy duty dump stench this morning. Starting at about 9:30am... still hanging in the air.	Email	Let Becky know that we're working on a more streamlined complaint process. Thanked her for reporting it.
200	11/26/2024	"Coffin Butte dump stench"	Forwarded to RS from DEQ	Not reported
201	11/26/2024	Coffin Butte dump stench	DEQ	Forwarded complaint to Republic on 12/2, waiting on response. Multiple complaints were reported over the holiday weekend.
202	11/27/2024	"went outside with my cup of coffee. Hit with the smell of the landfill"	Forwarded to RS from DEQ	Not reported
203	11/27/2024	Went outside with my cup of coffee. Hit with the smell of the landfill.	DEQ	Forwarded complaint to Republic on 12/2, waiting on response. Multiple complaints were reported over the holiday weekend.
204	11/30/2024	"sitting at my desk, when I started to smell it. It lasted for a about 3 hours"	Forwarded to RS from DEQ	Not reported
205	11/30/2024	"a terrible odor that we could smell from our car for about a mile north"	Forwarded to RS from DEQ	Not reported
206	12/1/24	Putrid, nose burning, eye irritating odor from landfill occurring weekly. Very strong (distinct and pervasive) Odor Offensiveness: How disagreeable was the odor? Highly offensive	Email	Let Katy know that we're working on a more streamlined complaint process. Thanked her for reporting it.
207	12/1/2024	"odor is so bad"	Forwarded to RS from DEQ	Not reported
208	12/1/2024	"sometimes unbearable"	Forwarded to RS from DEQ	Not reported
209	12/1/2024	"toxic landfill gases"	Forwarded to RS	Not reported

			from DEQ	
210	12/1/ 2024	"some sort of chemical", "rotten garbage"	Forward ed to RS from DEQ	Not reported
211	12/1/ 2024	Coffin Butte landfill toxic gases are flowing south to many houses in Soap Creek Valley, trapped by fog and stagnant air.	DEQ	Forwarded complaint to Republic on 12/2, waiting on response. Multiple complaints were reported over the holiday weekend.
212	12/1/ 2024	Passing by the Coffin Butte landfill on Saturday afternoon, there was a terrible odor that we could smell from our car for about a mile north and south of the landfill.	DEQ	Forwarded complaint to Republic on 12/2, waiting on response. Multiple complaints were reported over the holiday weekend.
213	12/1/ 2024	I live near the Coffin Butte Landfill and the odor is so bad today that I can barely stand outside. It is disappointing because it is a beautiful sunny day but the smell is so bad I don't want to rake my leaves or be outside at all.	DEQ	Forwarded complaint to Republic on 12/2, waiting on response. Multiple complaints were reported over the holiday weekend.
214	12/1/ 2024	This is an ongoing issue with the Coffin Butte Landfill odor, sometimes it is unbearable sometime just annoying, but always bad, and unknown what your smelling or what it is doing to you long term, we have been residents for 50 years and it continually gets worse and worse, PLEASE ISSUE A STOP!!!	DEQ	Forwarded complaint to Republic on 12/2, waiting on response. Multiple complaints were reported over the holiday weekend.
215	12/3/ 2024	A typical incident regarding Republic Services' Coffin Butte Landfill - in the morning when we go out with the dog, the odors are noticeable (this time the early odor smelled like some sort of chemical). We hurry back inside, then later in the morning head outside to attend to chores. As usual, the odor at this point is unbearable, now smelling like rotten garbage. We are not able to stand being outside until early afternoon. I indicated above that these incidents occur weekly, but that is an average. Sometimes, depending on weather patterns, they can be several days in a row, or occur less frequently.	DEQ	Forwarded complaint to Republic, waiting on response.
216	12/5/ 2024	I just described the incident in the above statement. I'm feeling nauseous by coffin butte landfill stink. It's now becoming more than a nuisance its really a health hazard for humans and animals in the surrounding area. Please take some real action and stop this. Thank you!!!!	DEQ	Complaint is general in nature and not event-specific. Called complainant 12/6 at 10:10 a.m. as requested and left a voicemail. Spoke with this individual on 11/25 also in response to a previous complaint.  12/6 - 10:50 a.m.

				complainant returned my call and spoke with them about the landfill odor issues.
217	12/6/2024	"landfill stench"	Forwarded to RS from DEQ	Not reported
218	12/11/24	Letter sent (in 2025.01.08 DSAC Meeting Packet). Her concerns related to excessive truck traffic, wondering why Republic's fleet isn't electric, safety and litter	Email	Bailey apologized that the link to the DSAC meeting on 12/11/24 wasn't working and let her know that I'd pass along her concern to the DSAC (in the meeting packet on 1/8/25) and include it in the 2024 CCAR
219	12/11/24	Letter sent (in 2025.01.08 DSAC Meeting Packet). Her concerns related to odors and a need for technological sensors that don't rely on the human nose.	Email	Bailey apologized that the link to the DSAC meeting on 12/11/24 wasn't working and let her know that I'd pass along her concern to the DSAC (in the meeting packet on 1/8/25) and include it in the 2024 CCAR
220	12/14/2024	"like a cross between a putrid low tide and an auto repair garage".	Forwarded to RS from DEQ	Not reported
221	12/14/2024	<p>Around 1:30pm Saturday Dec 14 I was driving home from Salem to Soap Creek Valley and had forgotten to put my car on "recirc" while passing the Coffin Butte landfill (Hwy 99 southbound, then onto Coffin Butte Rd). I don't often drive this way, but usually turn on recirc when I do because I just don't want to breathe in whatever unknowns are in the landfill odor (which I hear about regularly from other neighbors). Once I realized what I was smelling it was too late to block it and it was absolutely awful. The smell permeated my car, and I felt queasy for a good half hour after arriving home. PLEASE NOTE: under "Odor Frequency", above, you do not provide an option for "intermittent". The only reason I do not smell it regularly is because I don't pass by it "regularly." This was not the first time I've smelled the landfill (smelled/reported it once by my home, 5 miles away), but the first time I've experienced the full-onslaught from driving by without running recirc in my car.</p>	DEQ	Forwarded complaint to Republic, waiting on response.



222	12/20/2024	"odor" "far worse than usual"	Forwarded to RS from DEQ	Not reported
223	12/20/2024	Although this smell has occurred during recent mornings when there was an inversion, this afternoon the odor was far worse than typical. From past experience, I know this is coming from the Coffin Butte landfill to our north. I am putting my personal home address for where the incident occurred so you can see the extent of the odor.	DEQ	Forwarded complaint to Republic, waiting on response.
224	12/23/2024	landfill smell, 5	Direct Complaint to Republic Services - Maggie Livesay	Not reported
225	12/23/2024	"stench very noticeable"	Forwarded to RS from DEQ	Not reported
226	12/24/24	Letter in Gazette Times, "We Must do What we can to Stop Expansion" <a href="https://gazettetimes.com/news/local/corvallis-speaks-up-letters-to-the-editor-for-the-week-of-dec-27-2024/collection_a52e48b7-a3f2-5575-93f7-2046c2f847c3.html">https://gazettetimes.com/news/local/corvallis-speaks-up-letters-to-the-editor-for-the-week-of-dec-27-2024/collection_a52e48b7-a3f2-5575-93f7-2046c2f847c3.html</a>	Letter in Gazette Times	None
227	12/29/2024	"stench", "not one type of aroma"	Direct Complaint to Republic Services - Virginia Scott (also received forwarded from DEQ)	Not reported
228	12/29/2024	"strong methane odor"	Forwarded to RS from DEQ	Not reported
229	12/31/24	Letter in Gazette Times: Benton County Obscures Process <a href="https://gazettetimes.com/benton-county-obscures-process/article_1c5d0515-b578-5994-b5aa-ece6ac6ba8f8.html?utm_medium=social&amp;utm_source=email&amp;utm_campaign=user-share">https://gazettetimes.com/benton-county-obscures-process/article_1c5d0515-b578-5994-b5aa-ece6ac6ba8f8.html?utm_medium=social&amp;utm_source=email&amp;utm_campaign=user-share</a>	Letter in Gazette Times	None
230	12/31/2024	"stink"	Forwarded to RS from DEQ	Not reported
231	12/31/2024	As I was driving past the Coffin Butte dump on Coffin Butte Road in Benton County, OR on Sunday morning the stench was so strong that I has to put the car's air on recirculate until I was well north of	DEQ	Forwarded complaint to Republic, waiting on response.

		the dump. It was equally as terrible on my return trip past the dump at about 6:30 PM on 12/29/24 and was smelly even on recirculate well past the Tampico/Soap Creek intersection. This is an issue because on moist days, like Sunday, when the car air is on recirculate, the car windows fog up which makes it dangerous to turn onto Hwy 99.		Multiple complaints were reported over the holiday week.
232	12/31/2024	Almost every evening to early morning there is a strong methane odor originating from the Coffin Butte Landfill located north of Corvallis in Benton County Oregon. This year the odor has become strong enough to smell indoors if an air filter isn't in use. There is also a tremendous amount of litter and garbage along Camp Adair Road, Hwy 99 and other tributary roads leading to the landfill. The garbage is on the roads, in the ditches soaking in water and leaching into the ground. The air and material pollution is a hazard to humans, wildlife and plant life in the local area. There is no telling what chemicals and hazardous materials are contaminating the local biosphere.	DEQ	Forwarded complaint to Republic, waiting on response. Multiple complaints were reported over the holiday week.
233	12/31/2024	Coffin butte landfill is releasing methane gas and stink into the atmosphere. The stink is becoming worse each day. I don't have enough time to notify you beach day of the occurrence but it is becoming much more frequent, approximately 5 days a week now.	DEQ	Forwarded complaint to Republic, waiting on response. Multiple complaints were reported over the holiday week.

# EPA's information request of Republic Services

**Service of Process Transmittal Summary**

**TO:** ANDREA BETTIS, Senior Paralegal  
Republic Services, Inc.  
18500 NORTH ALLIED WAY  
PHOENIX, AZ 85054

**RE:** Process Served in Oregon

**FOR:** Valley Landfills, Inc. (Domestic State: OR)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** United States Environmental Protection Agency vs. Republic Services, Inc.

**DOCUMENT(S) SERVED:** Letter, Attachment(s)

**COURT/AGENCY:** None Specified  
Case # None Specified

**NATURE OF ACTION:** Subpoena - Business records - Pertaining to Coffin Butte Landfill, Corvallis, Oregon

**PROCESS SERVED ON:** C T Corporation System, Salem, OR

**DATE/METHOD OF SERVICE:** By Traceable Mail on 01/21/2025 postmarked on 01/16/2025

**JURISDICTION SERVED:** Oregon

**APPEARANCE OR ANSWER DUE:** Within 10 days of receipt (Document(s) may contain additional answer dates)

**ATTORNEY(S)/SENDER(S):** Morgan Jencius  
Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, WA 98101-1128  
206-553-6914

**ACTION ITEMS:** CT has retained the current log, Retain Date: 01/21/2025, Expected Purge Date: 01/26/2025  
  
Image SOP  
  
Email Notification, SOP Notifications [sopnotifications@republicservices.com](mailto:sopnotifications@republicservices.com)

**REGISTERED AGENT CONTACT:** CT Corporation System  
780 Commercial Street? SE  
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8775647529  
[MajorAccountTeam2@wolterskluwer.com](mailto:MajorAccountTeam2@wolterskluwer.com)

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the

included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

U.S. ENVIR

SARA CONLEY (20-C04)  
US EPA (R10)  
1200 6TH AVENUE  
SUITE # 155  
SEATTLE, WA 98101

PENALTY FOR PRIVATE USE, \$300

CERTIFIED MAIL



9589 0710 5270 0837 9108 14



US POSTAGE PITNEY BOWES

ZIP 98101 \$ 010.99<sup>0</sup>  
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AN EQUAL OPPORTUNITY EMPLOYER



United States  
Environmental Protection  
Agency

Region 10  
1200 Sixth Avenue  
Seattle WA 98101-1128

Official Business  
Penalty for Private Use \$300

EQUAL OPPORTUNITY EMPLOYER

REGISTERED AGENT- VALLEY LANDFILLS INC  
CT CORPORATION SYSTEM  
780 COMMERCIAL STREET S.E.  
SUITE# 100  
SALEM, OR 97301



**REGION 10**

SEATTLE, WA 98101

**RETURN RECEIPT REQUESTED**

Ian Macnab  
Environmental Manager  
Republic Services, Inc.  
28972 Coffin Butte Road  
Corvallis, Oregon 97330

**Re: INFORMATION REQUEST** Regarding Coffin Butte Landfill, Corvallis, Oregon

Dear Ian Macnab:

The U.S. Environmental Protection Agency (EPA), Region 10 seeks information concerning the Coffin Butte Landfill owned or operated by Valley Landfills Inc., a wholly-owned subsidiary of Republic Services, at 2917 Coffin Butte Road in Corvallis, Oregon. The enclosed Information Request is issued to Valley Landfills Inc. pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414.

Under CAA Section 114, 42 U.S.C. § 7414, EPA is authorized to require the submission of records, reports and other information for the purpose of determining whether any violations of the CAA have occurred and for other purposes of the CAA. Valley Landfills Inc. is required to provide information and documents in accordance with the enclosed Information Request within **60 days** of your receipt of the request. If you anticipate being unable to fully respond to this Information Request by the specified date, you may request an extension within **10 days** of receipt of this request. Include a justification for your extension request. If timely submitted, EPA will consider your request and may extend the deadline.

Submit your response to this Information Request or request for extension to:

Sara Conley  
[Conley.sara@epa.gov](mailto:Conley.sara@epa.gov)  
Air Enforcement Officer  
Air Enforcement Section, Enforcement and Compliance Division, EPA Region 10

Please ensure the enclosed Statement of Certification is signed by a duly-authorized officer or agent of Valley Landfills Inc. and returned with the response to this Information Request.

Failure to timely respond fully and truthfully to this Information Request may subject you to civil penalties pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. Your response to this Information Request may be used by EPA in administrative, civil or criminal proceedings.

Thank you for your cooperation. If you have any questions regarding this Information Request or wish to request an extension, please contact Sara Conley, at (206) 553-6914 or [conley.sara@epa.gov](mailto:conley.sara@epa.gov). For legal matters or questions from legal counsel, please contact Brandon Jones-Cobb, in the Office of Regional Counsel, at (206) 553-6917 or [jonescobb.brandon@epa.gov](mailto:jonescobb.brandon@epa.gov).

Sincerely,

MORGAN JENCIUS

Digitally signed by MORGAN  
JENCIUS  
Date: 2025.01.15 12:40:57 -08'00'

Morgan Jencius, Manager  
Air and Land Enforcement Branch  
Enforcement and Compliance Assurance Division

Enclosures

1. Information Request
2. Statement of Certification

cc: Registered Agent – Valley Landfills Inc.  
CT Corporation System

Becka Puskas, J.D.  
Interim Manager, Office of Compliance and Enforcement  
Oregon Department of Environmental Quality



**ENCLOSURE 1**  
**CAA INFORMATION REQUEST**

**Republic Services, Valley Landfills Inc.**

**A. INSTRUCTIONS**

1. Provide a separate narrative response to each question and subpart of a question in this Information Request. Mark each answer with the number of the question (and subpart, if applicable) to which it corresponds.
2. For each question, provide a copy of each document relied on or referred to in the preparation of the response or that contains information responsive to the question.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. Provide the name, title, and business contact information for each person who prepared or was consulted in the preparation of your response. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained in this Information Request, or who may be able to provide additional responsive documents, provide the name, title, and business contact information for each such person and the additional information or documents that they may have.
5. If you believe a question is not applicable to the Facility, explain the reason for that belief.
6. The information requested must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may assert a confidentiality claim covering part or all of the information submitted, pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414 and 40 C.F.R. Part 2, by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA.

Information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. See 40 C.F.R. § 2.301 for additional rules governing certain information obtained under the CAA. Note that certain categories of information, including "emission data," are not entitled to confidential treatment. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. See also 41 Fed. Reg. 36902 (Sept. 1, 1976).

If you claim all or part of your response as a trade secret, proprietary, or company confidential, please also return with your response a complete substantiation of your claim. Enclosure 3 contains the information you must provide in order to substantiate your claim. If you require additional time to substantiate your confidentiality claim, contact the individuals listed in the cover letter.

**B. DEFINITIONS**

All terms used in this Information Request have their ordinary meaning unless such terms are defined in this Information Request; or 302 of the CAA, 42 U.S.C. §§ 7401 or 7602; or 40 C.F.R. Part 63, Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. For purposes of this Information Request:

1. The terms "you" or "Respondent" mean Republic Services, Coffin Butte Landfill, Valley Landfills Inc., and its subsidiaries, officers, directors, managers, partners, employees, contractors, and agents, as applicable.
2. "Abandoned" means, when used in reference to a component of the gas collection system, a component that is no longer operating.
3. "Document" means any object that records, stores, or presents information, and includes, without limitation, email, writings, memoranda, contracts, agreements, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. Include all attachments to or enclosures with any responsive document.
4. "Facility" means the municipal solid waste landfill owned or operated by Respondent located at Highway 99 & Coffin Butte Road Corvallis, OR 97330.
5. "Gas Collectors" means vertical wells, horizontal collectors, or other collection devices capable of collecting and extracting gas at the landfill and meets the requirements of 40 C.F.R. § 63.1962 and parallel provisions under the other EPA Landfill Air Regulations.
6. "Gas collection system" means the active or passive system of wells or similar collection components used to collect and move gas at the landfill.
7. "Gas Collection and Control System" or "GCCS" means an active or passive system of wells or similar collection components to move gas at the landfills to associated control devices per the requirements at 40 C.F.R. § 63.1959(b)(ii) and parallel provisions under the other EPA Landfill Air Regulations.
8. "Gas Collection and Control System Design Plan" or "Design Plan," means a plan that is developed by the landfill and meets the requirements of 40 C.F.R. § 63.1981(d) and parallel provisions under the other EPA Landfill Air Regulations.
9. "Gas Control System" means the systems that treat and/or destroy landfill gases collected by the gas collection system, including but not limited to flares, gas to energy projects, and renewable natural gas plants, as well as any other control devices and treatment systems used to fulfill the control requirements of 40 C.F.R. § 63.1959(b)(2)(iii) and parallel provisions under the other EPA Landfill Air Regulations.
10. "Landfill" means the municipal solid waste (MSW) landfill operated by Republic Services, Coffin Butte Landfill, or Valley Landfills Inc..
11. "Landfill Air Regulations" refers to 40 C.F.R. Part 60, Subpart WWW; 40 C.F.R. Part 60, Subpart XXX; 40 C.F.R. Part 62, Subpart OOO; 40 C.F.R. Part 62, Subpart GGG; 40 C.F.R. Part 63, Subpart AAAA; and State Plans for the Control of Emissions from Existing Municipal Solid Waste Landfills incorporated under 40 C.F.R. Part 62 pursuant to 40 C.F.R. Part 60, Subpart Cf or Cc, as applicable.

12. "LandGEM" means EPA's Landfill Gas Emissions Model, which is an automated estimation tool with a Microsoft Excel interface that can be used to estimate emissions for total landfill gas, methane, carbon dioxide, nonmethane organic compounds, and individual air pollutants from municipal solid waste landfills.
13. "Leachate" means liquids, including landfill gas condensate inside the landfill.
14. "Owner or Operator" means any Person who owns, leases, operates, controls, or supervises the Facility.
15. "Person" or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country), or any other entity, and includes Republic Services, Coffin Butte Landfill, and Valley Landfills Inc.
16. "Surface Emission Monitoring or SEM" means monitoring surface concentrations of methane at collection areas of a landfill, as required by 40 C.F.R. §§ 63.1960(c)&(d) and parallel provisions under the other EPA Landfill Air Regulations.
17. "You and/or Your" means Republic Services, Coffin Butte Landfill, Valley Landfills Inc. and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors, and others who are in possession, custody, or control (actual or constructive) of relevant information that is otherwise available to You or may have obtained information for or on Your behalf.

#### **C. INFORMATION REQUEST**

Provide the following information for the Facility. Unless otherwise specified, provide all responsive information for the time period between January 1, 2022 and the date of this Request.

##### **General Applicability:**

1. Provide the name and address of the legal owner of the Facility. If the owner and operator of the Facility are not the same entity, provide the name and address of the operator of the Facility and provide contracts/legal documents between entities as they relate to ownership, purchase or buy-back agreements and contract operation.
2. Provide copies of any submitted initial or amended design capacity reports.

(As referenced in 40 C.F.R. §§ 63.1981, 63.1983(a) and parallel provisions under EPA's Landfill Air Regulations).

##### **Permits and Applications/Alternatives/Variations/Previous Enforcement:**

3. Provide copies of the following documents for the Facility:
  - a. All permit(s) in effect as of the date of this Request and the permit application(s) You submitted to obtain each such permit;
  - b. Permit application(s) pending as of the date you received this Request; and

- c. The original construction permit(s) and permit application(s). If an original construction permit has been modified, provide the current version of the construction permit.
4. Provide a copy of the following:
  - a. All applicability determination or regulatory interpretation requests to and responses from the Oregon Department of Environmental Quality or EPA;
  - b. All approvals of alternatives to Landfill Air Regulation requirements issued by Oregon Department of Environmental Quality or EPA; and
  - c. Alternative compliance timeline requests to and responses from the Oregon Department of Environmental Quality or EPA.
5. Provide information regarding citizen complaints that the Landfill has knowledge of between January 1, 2022, and the date of this request. The information should include:
  - a. Date and time;
  - b. Location at or near the Landfill which is the subject of the complaint;
  - c. Copy or description of complaint;
  - d. Corrective action or monitoring done as a result; and
  - e. Name and contact information for the person who submitted the complaint.

**Semi-annual/Annual Reports:**

6. Provide the semi-annual and annual reports between January 1, 2022 and the date of this request in an electronic format such as a searchable PDF.

*(As referenced in 40 C.F.R. §§ 63.1959(a)-(b), 63.1981(h) and parallel provisions under EPA's Landfill Air Regulations).*

**Waste Type and Quantity Data:**

7. Provide the monthly quantity (short tons or megagrams, labeled) of waste accepted at the Landfill between January 1, 2022 and the date of this request, including:
  - a. A breakdown by type of waste (e.g., municipal solid waste, construction and demolition, asbestos, sludge, etc.);
  - b. List the types and quantities of waste that were excluded from the maximum expected gas generation calculation and the rationale for excluding those types of waste; and
  - c. List the types and quantities of waste that are classified as "inert" in facility reports for the Greenhouse Gas Reporting Program pursuant to 40 C.F.R. § 98.346(c).

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

*(As referenced in 40 C.F.R. §§ 63.1983(a), (d) and parallel provisions under EPA's Landfill Air Regulations).*

**Gas Collection and Control System (GCCS) Design:**

8. Provide a copy of the following documents related to the Design Plan:
- a. Design Plans in effect at the Landfill since January 1, 2022.
  - b. Copies of EPA or Oregon Department of Environmental Quality approval, disapproval, or other response to the two most recent Design Plans. If EPA or Oregon Department of Environmental Quality did not provide an approval, disapproval, or other response, provide a statement that EPA or Oregon Department of Environmental Quality approval did not approve, disapprove, or otherwise respond to Valley Landfill Inc's submission of the Design Plan(s).
  - c. Identification of, and an explanation for, areas excluded from gas collection;
  - d. A description of the design of the main gas header, including:
    - i. Maximum rated flow rate capacity;
    - ii. Maximum operating flow rate; and
    - iii. Maximum allowable pressure drop.
  - e. As-built, final design documents for each flare/blower system. The design documents shall include but not be limited to the following (for each piece of equipment):
    - i. The manufacturers' expected/design life (years);
    - ii. Minimum and maximum design flare temperatures (°F);
    - iii. The rated maximum flow rate capacity of the flare (standard cubic feet per minute, scfm); and
    - iv. The blower(s) and backup blower(s) rated maximum flow rate at inlet vacuum.
  - f. Most recent maximum expected gas flow rate calculations, if different from the Design Plan.
    - i. Include the annual or monthly waste breakdown for every year used in the maximum expected gas flow rate calculations.
    - ii. If LandGEM is used, provide a spreadsheet containing the most recent LandGEM calculation.
    - iii. If LandGEM is not used, provide documentation of the method used to calculate the maximum expected gas flow rate.
    - iv. Include scale house data of waste excluded from LandGEM calculations.

*(As referenced in 40 C.F.R. § 63.1981 and parallel provisions under EPA's Landfill Air Regulations).*

9. Provide report(s) for gas collection and control system stack test(s) and performance test(s), including initial tests, as well as other compliance testing, engineering testing, and testing for general information.

*(As referenced in 40 C.F.R. § 63.1983(b) and parallel provisions under EPA's Landfill Air Regulations).*

**Gas Collection System:**

10. Provide the following information for the gas collection system:
- a. List of existing and historical Gas Collectors/wellheads and leachate collectors, which are or were connected to the gas collection and control system;
  - b. For each existing or historical Gas Collector/wellhead or leachate collector that is not in active service collecting landfill gas as of the date of this Request, provide the date on which the Gas Collector/wellhead was taken out of active service and describe the status of the Gas Collector/wellhead, including whether the valve is open or closed, whether the Gas

Collector/wellhead is connected to the GCCS, whether the header lateral has been capped, and whether the Gas Collector/wellhead has been abandoned. Provide documents explaining the basis for each Gas Collector/wellhead abandonment, as well as any approvals issued by EPA or the Oregon Department of Environmental Quality for abandoning the Gas Collector/wellhead;

- c. Indicate whether a Gas Collector is a vertical or horizontal Gas Collector;
- d. Indicate the location of each Gas Collector, both by cell and by GPS coordinates;
- e. Indicate whether each existing Gas Collector has a pump for leachate/water removal;
- f. Indicate higher operating value or alternative operating procedure for Gas Collector;
- g. Installation dates for Gas Collector/wellhead installed between January 1, 2022 and the date of this request; and
- h. From January 1, 2022 to the date of this request, evaluations or analyses, conducted either by you or an external consultant/company, of the gas collection system, including any evaluation or analysis related to:
  - i. Gas Collector placement;
  - ii. Gas Collector depth;
  - iii. Gas Collector density; and
  - iv. Amount of vacuum applied to the Gas Collector/wellhead.

(As referenced in 40 C.F.R. §§ 63.1957-62, 63.1981(d)-(e) and parallel provisions under EPA's Landfill Air Regulations).

- 11. Provide the current topographic site map(s) displaying the following information:
  - a. Gas Collector/wellhead locations and identifiers, including gas laterals and gas headers; and
  - b. Areas in which gas collection is not occurring.

(As referenced in 40 C.F.R. § 63.1958(d) and parallel provisions under EPA's Landfill Air Regulations)

#### **Wellhead Monitoring Data:**

- 12. In an unlocked, Excel-compatible electronic spreadsheet format, provide GCCS monitoring records, including dates, times between January 1, 2022 and the date of this request, including the following:

- a. Monthly GCCS Gas Collector/wellhead measurements, including:
  - i. Methane;
  - ii. Carbon dioxide (CO<sub>2</sub>);
  - iii. Carbon monoxide (CO);
  - iv. Flow rate;
  - v. Oxygen;
  - vi. Nitrogen;
  - vii. Pressure;
  - viii. Temperature; and
  - ix. Notes taken by the technician during monitoring, corrective actions, and re-monitoring measurements.
- b. Monitoring data for each blower, including vacuum;

- c. Gas Collector/wellhead parameter exceedances and corrective actions, including enhanced monitoring due to elevated temperatures, and corrective actions;
- d. Gas Collector/wellhead higher operating values approvals relevant from January 1, 2022 and the date of this request, along with approvals of alternative timelines or corrections in that time; and
- e. A list of Gas Collectors/wellheads not monitored during monthly monitoring and the explanation for exclusion.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. §§ 63.1958(b)-(c), 63.1961, 63.1962, 63.1981, 63.1983, and parallel provisions under EPA's Landfill Air Regulations)

**Depth-to-Water and Depth of Perforation Data:**

13. In an unlocked, Excel-compatible spreadsheet(s), provide the following information related to each vertical Gas Collector available between January 1, 2022 and the date of this request:
- a. Records of measurements of depth to water and/or height of water taken between January 1, 2022 and the date of this Request;
  - b. Documentation of pinches and other obstructions;
  - c. Depth to bottom of the vertical Gas Collector;
  - d. Length of perforated pipe;
  - e. Percentage of perforation; and
  - f. A description of corrective actions taken by the facility as a result of the water level measurements or observation of obstructions, as applicable.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1962(b)(2), and parallel provisions under EPA's Landfill Air Regulations)

14. Provide a description of standard operating procedures or internal guidelines relating to Gas Collector obstruction and/or dewatering at the Facility.

**GCCS Main Header Data:**

15. In an unlocked, Excel-compatible spreadsheet, provide the following landfill gas collection system main header data on an hourly basis from January 1, 2022 and the date of this request:
- a. Date and hour;
  - b. Average system pressure (inches of water column, in. w.c.);
  - c. Average gas flow rate collected (standard cubic feet per minute, scfm);
  - d. Average landfill gas temperature (degree Fahrenheit, °F); and
  - e. Average methane concentration.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

*(As referenced in 40 C.F.R. § 63.1961(a), and parallel provisions under EPA's Landfill Air Regulations)*

16. Provide gas sampling reports between January 1, 2022 and the date of this request. Your response should include, but not be limited to, sampling done for:
- Methane concentration;
  - Sulfur compounds; and
  - Hazardous air pollutant (HAP) content.

**Gas Control System:**

**General:**

17. Provide monthly inspection, maintenance, and repair logs and records for each piece of control equipment (e.g., blower/flare system) between January 1, 2022 and the date of this request.

*(As referenced in 40 C.F.R. § 63.1983(c)(7), and parallel provisions under EPA's Landfill Air Regulations)*

18. In an unlocked, Excel-compatible spreadsheet, provide the following monitoring data for each flare between January 1, 2022 and the date of this request:
- Temperature readings;
  - Gas flow readings;
  - Methane percentages at each flare;
  - Operating hours on a monthly basis for each flare;
  - Records of bypass incidents at each flare; and
  - Monthly SO<sub>2</sub> emissions calculations (tons/month, tons/year) for each flare system with supporting calculations.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

---

*(As referenced in 40 C.F.R. § 63.1961(b)-(c), and parallel provisions under EPA's Landfill Air Regulations)*

**Surface Emissions Monitoring (SEM):**

19. Provide SEM records since January 1, 2022. Please make sure units of measurement are clearly indicated. For each monitoring event, include:
- Date(s) and description(s) of the monitoring activity, including identification of the device used;
  - SEM data, including but not limited to instrument calibration data, methane concentration at the location of each monitored exceedance marked according to 40 C.F.R. § 63.1960(c)(4)(i), any other recorded methane concentrations, raw instrument data outputs, methane concentration upon re-monitoring at the location of each monitored exceedance; and



- c. Records or descriptions (if the facility does not maintain records) of corrective actions performed in response to each monitored exceedance;
- 20. GPS coordinates, notes, drawings, maps or other records of the actual path traversed by the SEM technician for each quarterly SEM event since January 1, 2022, depicting:
  - a. The monitoring route traveled and any deviations from the 30-meter intervals; and
  - b. Areas excluded from surface emission monitoring (SEM) or exempt from quarterly SEM, including explanation(s) for each area excluded or exempted.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

*(As referenced in 40 C.F.R. § 63.1961(f), and parallel provisions under EPA's Landfill Air Regulations)*

- 21. Records or reports of additional emissions monitoring activities conducted at the direction of the Facility, including but not limited to drone, satellite, and tower-based monitoring, between January 1, 2022 and the date of this request.

**Gas Migration:**

- 22. Provide gas measurements at the gas monitoring probes between January 1, 2022 and the date of this request.
- 23. Provide records of corrective actions taken and remediation plans made in response to methane measurements taken at the gas monitoring probes.
- 24. Provide a map of the gas monitoring probe locations.

*(As referenced in 40 C.F.R. §§ 63.1960(c), 63.1961(f), and parallel provisions under EPA's Landfill Air Regulations)*

**ENCLOSURE 2**  
**STATEMENT OF CERTIFICATION**

Republic Services, Inc.  
28972 Coffin Butte Road  
Corvallis, Oregon 97330

**INFORMATION REQUEST**  
**STATEMENT OF CERTIFICATION**

I certify that the enclosed responses to EPA's Information Request issued to Republic Services, Inc. are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Republic Services, Inc. under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

---

Signature

---

Printed Name

---

Title

---

Date

**ENCLOSURE 3**  
**SUBSTANTIATION OF**  
**CONFIDENTIAL BUSINESS INFORMATION CLAIM**

**Republic Services, Valley Landfills Inc.**

EPA is providing you notice that if you assert a claim of business confidentiality for information you provide in response to this Information Request, EPA will determine whether such information is entitled to confidential treatment, pursuant to 40 C.F.R. Part 2, subpart B, including 40 C.F.R. §§ 2.208 and 2.301. If you feel that some or all of the information is entitled to confidential treatment, you must make the showings below with specific reference to those portions of the information you consider confidential.

Please be specific by page (including Bates Stamp, if applicable), paragraph, and sentence when identifying and substantiating the information subject to your claim. Where your claim, as originally made or as modified by your response to this letter, does not include all information on a page, please attach a copy of each such page with brackets around the text that you claim to be CBI. Please note that if a page, document, group, or class of documents claimed by you to be CBI contains a significant amount of information which the EPA Region 10, Office of Regional Counsel determines is not CBI, your CBI claim regarding that page, document, group, or class of documents may be denied. Any information not specifically identified as subject to a confidentiality claim and substantiated as such in your response to this letter may be disclosed to the requester without further notice to you.

In making its final confidentiality determination, the EPA will consider the relevant substantive criteria in its CBI regulations, under 40 C.F.R. § 2.208(a)-(d), as well as the U.S. Supreme Court's decision in *Food Marketing Institute v. Argus Leader Media* (Argus), 139 S. Ct. 2356 (2019), which evaluated the definition of "confidential" as used in Exemption 4. In the Argus decision, the Court held that at least where "[1] commercial or financial information is both customarily and actually treated as private by its owner and [2] provided to the government under an assurance of privacy, the information is 'confidential' within the meaning of Exemption 4." Argus, 139 S. Ct. at 2366.

For each item or class of information that you continue to claim as CBI, please answer the following questions, giving as much detail as possible. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to be entitled to confidential treatment:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. Has EPA, another federal agency, or court made any determination as to the confidentiality of the information? If so, please attach a copy of the determination.
4. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?
4. Is the information contained in any publicly available material such as patents or patent applications, publicly available databases (including state databases), promotional publications, annual reports, or articles?

If you answered "yes," please identify the publicly available information and its location (e.g., patent number or website address).

5. Has your company taken reasonable measures to protect the information claimed as CBI? If so, please identify the measure or internal controls your business has taken to protect the information claimed as confidential:
  - a. Non-disclosure agreement required prior to access. Yes/No
  - b. Access is limited to individuals with a need-to-know. Yes/No
  - c. Information is physically secured (e.g. locked in a room or cabinet) or electronically secured (encrypted, password protected, etc.). Yes/No
  - d. Other internal control measures(s). Yes/No. *(If yes, please explain.)*
6. Does your company customarily keep the information private or closely-held? If so, please explain the basis for your response.
7. ~~At the time you submitted the information you claimed as CBI, did EPA provide any~~ express or implied assurance of confidentiality? If so, please explain the specific assurance(s) you received. For example, expressed assurances indicating that information will not be publicly disclosed could include legal authorities (regulation or statute), direct communications, class determinations, etc. Examples of implicit assurances could include a description of the specific context in which the information was received.
8. Did the Agency provide any expressed or implied indications at the time the information was submitted that EPA would publicly disclose the information?
9. If you believe any submitted information to be a trade secret, please state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be a trade secret.

10. Are there any means by which a member of the public could obtain access to the information or readily discover the information claimed as confidential through reverse engineering?
11. Please explain why the information claimed as confidential is not emissions data under the Clean Air Act.
12. Explain any other issue or additional information you deem relevant to EPA's determination.

Please note that *you bear the burden of substantiating your confidentiality and trade secret claim(s)*. Generalized or conclusory statements will be given little or no weight in EPA's determination on the confidentiality of the information you claim to be CBI.

Your comments must be postmarked or hand delivered to this office, or emailed to Sara Conley [conley.sara@epa.gov](mailto:conley.sara@epa.gov), by the 30<sup>th</sup> day after receipt of this letter. You may seek an extension of time to submit your comments to this office, but the request must be made before the 30<sup>th</sup> day after receipt of this letter. Except in extraordinary circumstances, no extension will be approved. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information.

If you wish to claim any information that you provide in your response to this letter to itself be confidential, you must mark the response "**CONFIDENTIAL**" or with a similar designation, and must bracket all text in the response that you so claim. Information so designated will be disclosed by the EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information provided in your response as confidential, it may be made available to the public.

# EPA's response to the Freedom of Information Act submittal by Benton County staff



# Clean Air Act Partial Compliance Evaluation Inspection Report

## ***Valley Landfills Inc. Coffin Butte Landfill***

2917 Coffin Butte Rd  
Corvallis, Oregon

Inspection Date: June 21, 2024

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Report Author Signature

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Clean Air Act Inspector  
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Peer Review Signature

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Attachment 1 EPA Inspection Photo, Video and SEM Log

Attachment 2 EPA Surface Emission Monitoring Map

Attachment 3 IRwin Calibration

Attachment 4 TVA 2020 Calibration

Attachment 5 SEM Repair tracking



## I. Basic Facility and Inspection Information

**Facility:** Valley Landfills Inc.  
2917 Coffin Butte Rd  
Corvallis, Oregon 97330

**Mailing Address:** 2917 Coffin Butte Rd  
Corvallis, OR 97330

**AFS/FRS Number:** 110004808423

**SIC:** 4953 Refuse Systems

**NAICS:** 562212 Solid Waste Landfill

**Permit Number:** 02-5902-TV-01

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Katie Eagleson – Air Toxics Permitting Engineer

Heather Kuoppamaki - Senior Air Quality Engineer

Alex Haulman – Air Quality Inspector, Eastern Region

Laura McWhorter – Natural Resource Specialist

**Date of Inspection:** June 21, 2024

**Inspection Start/End Times:** 9:45 – 16:30

**Inspection Notice:** This was an unannounced inspection. At approximately 9:00am on June 21, 2024 I called Ian Macnab to let him know that we would be arriving at the facility in about 45 minutes.

## II. Purpose of Inspection

This was a multi-media Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA). Inspector Conley, EPA Region 10, led the inspection and was assisted by EPA inspectors Alyson Skeens, EPA Region 10, and Steve Rapp, EPA AED/OECA, (collectively, “the inspectors”). The regulatory state air agency, the Oregon Department of Environmental Quality, was made aware of the inspection beforehand and participated in the inspection.

This was a partial compliance evaluation by the U.S. Environmental Protection Agency Region 10. The purpose was to identify potential compliance concerns with CAA regulations, specifically the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills, 40 CFR Part 63 Subpart AAAA and 40 CFR Part 61 Subpart M—National Emission Standard for Asbestos. The facility operates under a Title V Air Operating Permit (302-9502-TV-01). The facility is also subject to the federally enforceable Oregon State Plan for existing municipal solid waste landfills. The facility is regulated under the Oregon Administrative Rules at Chapter 340, Division 236 (OAR 340-236-0500) entitled “Solid Waste Landfills: Emission Standards for Municipal Solid Waste Landfills.”

### Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from a subsequent records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

## III. Compliance History

EPA’s Enforcement and Compliance History Online, ECHO<sup>1</sup>, lists four on-site CAA inspections since 2022.

CAA	PCE On-Site	EPA	06/21/2024
CAA	FCE On-Site	State	07/11/2022
CAA	PCE On-Site	State	07/07/2022
CAA	PCE On-Site Monitoring/Sampling	EPA	06/23/2022

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<sup>1</sup> See <https://echo.epa.gov/>

The ECHO database does not list formal or informal enforcement actions in the last three years for the CAA or other statutes.

#### **IV. Pre-Inspection Observations**

We went directly to the facility. No observations were made prior to the scheduled inspection.

#### **V. Facility and Process Description**

The following facility description is based on information provided by a facility representative in the opening conference as well as documents submitted by the facility to ODEQ.

The Valley Landfills Inc. facility (“the landfill,” “the facility,” or “Coffin Butte”) is located in Benton County Oregon. The landfill began accepting waste in 1978 and has a design capacity of approximately 39.7 tons. In 2021 there were 312 active vertical wells and a landfill gas control capacity equal to 5000 standard cubic feet per minute (scfm). Approximately 110 acres of the landfill have been constructed. The landfill directs landfill gas to an electrical generation plant owned and operated by the Pacific Northwest Generating Cooperative (PNGC). PNGC has a total of five engines capable of combusting 1915 standard cubic feet per minute (scfm). The PNGC facility has two backup flares with a combined capacity of 3,000 scfm.

The landfill uses interim cover consisting of temporary plastic covers. Temporary plastic cover is 12-mil lightweight plastic or 45-mil ethylene propylene diene monomer (EPDM) rubber. The cover material is anchored to the surface of the landfill. Sheet seams are sewn together, taped, or made to overlap with sandbags. Interim soil cover is typically 12 inches thick. Interim soil and plastic cover are placed to control landfill gas prior to final cover placement.

According to the facility, final cover will be installed once areas have settled. The final cover will consist of an under-drainage layer, 24” of soil, geomembrane and a drainage layer.

#### **VI. Entry and Opening Conference**

Inspectors Rapp, Skeens and I arrived at 9:40am along with representatives from ODEQ. The opening conference began at 9:45am.

Opening conference attendees included:

ODEQ:

- Becka Puscas
- Katie Eagelston
- Heather Kuoppamaki
- Alex Haulman
- Laura McWhorter

Valley Landfills Inc.

- Ian Macnab
- Broc Kienholz
- Phil Caruso

Inspectors Rapp, Skeens and I presented our credentials to Mr. Macnab. I explained the purpose of the inspection was to evaluate compliance with the Clean Air Act and that we would be primarily focused on conducting surface emission monitoring (SEM). I explained that we had three instruments with us, the two TVA 2020s<sup>2</sup> and an Inficon IRwin SX<sup>3</sup>, which can be used to measure surface concentrations of methane. I explained that we would calibrate each instrument following the opening conference. We also notified the facility that we planned to take photos with a digital camera<sup>4</sup> and that we brought a Forward Looking Infrared (FLIR) Camera<sup>5</sup> capable of visually monitoring methane. I explained that all measurements, photos, video, and other information collected during the inspection would be included in the inspection report. I also described the timeline of the inspection and set expectations that we would be asking questions of the facility staff as we conducted the inspection.

I asked about the age of the landfill and about the cells in the landfill that are subject to the gas collection and control and surface emission monitoring (SEM) requirements under the federal CAA regulations for Municipal Solid Waste (MSW) Landfills. The facility representatives explained that the landfill first accepted waste in the 1970s. There is waste older than 5 years in every cell of the landfill. Inspector Rapp asked if there are any areas of the landfill that are currently excluded from gas collection and control. The facility representatives said that long ago there were areas but not now. At this landfill there is a cell of asbestos monofil as well as a small area that has asbestos buried in-place. Most asbestos is in the designated asbestos cell.

Mr. Kienholz explained how waste shipments are accepted at the facility. Trucks with municipal solid waste are weighed at the scale house. Mr. Kienholz stated that the commercial trucks have an account with Republic Services and if they bring in special wastes that information is recorded at the scale house. New waste is placed in active fill areas onsite. There is a new cell under construction at the landfill which will be located near the asbestos cell.

Inspector Skeens asked what the approximate volume of asbestos containing waste (ACW) Coffin Butte received and the customer breakdown between public and commercial. Mr. Macnab stated that Coffin Butte receives approximately 5,000 to 10,000 tons of ACW per year.

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<sup>2</sup> Thermo Fisher Scientific Model TVA 2020, Serial Number 202023127089 and Thermo Fisher Scientific Model TVA 2020, Serial Number 202017092713

<sup>3</sup> Inficon IRwin SX device, using the Elkins Earthworks software, held by EPA OECA/AED, Serial #: 580-01092006439

<sup>4</sup> Olympus Tough TG-6, Serial Number BJ5B27623

<sup>5</sup> FLIR Gx620 1060080

Macnab stated that Coffin Butte does not typically receive ACW from the public and most shipments are from commercial contractors. Mr. Macnab stated that Coffin Butte will see loads coming from Coast from Portland to Eugene up to Willamette. Coffin Butte rarely receives waste from out of state but if they do it would most likely be from Washington.

Inspector Skeens asked if Coffin Butte has turned ACW loads away for discrepancies. Mr. Macnab stated that they have turned loads away before. The load is inspected when dropped off and workers will require bags to be taped if there are rips or tears. Inspector Skeens ask if they could see the asbestos cell during the inspection. Mr. Macnab states that the asbestos cell was downhill from the construction site and advised against going there for safety concerns. Inspector Skeens asked if Coffin Butte had plans to layer over the asbestos cell with MSW. Mr. Macnab stated that there are plans but he was not sure when that would take place.

Inspectors Rapp and I asked about how the facility monitors surface emissions and the landfill gas collection system. The facility representatives explained that their consultant, SCS, provides a SEM route map and performs the SEM monitoring on foot. The facility representatives stated that the most recent surface emissions monitoring was performed a few months ago. The facility representatives do not observe the surface emission monitoring conducted by SCS. According to the facility representatives, if SCS identifies surface emission exceedances, SCS reports the exceedances to Republic Services and Republic Services will make the repairs. Inspector Rapp asked if there are any areas of the landfill that are not monitored for surface emissions. The facility representatives said that they do not monitor dangerous areas such as where there active filling is occurring.

I asked who conducts the well parameter monitoring and the facility told me that PNGC Power monitors the wells. PNGC Power operates the landfill gas to energy facility. I asked about interior well installations and the facility representatives told me that wells will be installed beginning in July. The facility has a combination of vertical and horizontal interior wells installed and the facility representatives explained that the active fill area is managed with horizontal wells. The facility reported that cover integrity monitoring is conducted by in-house staff.

Inspector Rapp asked if the flares were operating that day. The facility representatives indicated that the landfill was producing approximately 1800 scfm of which approximately 1000 scfm was being routed to the engines and the remainder to flares. The inspectors indicated that they would like to visit the flare station later during the facility walkthrough.

I asked the facility for a printed map of the landfill and we discussed where we planned to conduct the monitoring with Mr. Macnab. I explained that we would not be conducting a full surface emission monitoring survey over the entire landfill and that our inspection would be limited to an area before lunch and one after lunch. I decided to start with the area closest to the facility's office for the morning and then to visit the flare station and northeastern area in the afternoon. The opening conference concluded at approximately 10:50. Immediately following the opening conference we calibrated the two TVA 2020s and the Irwin.

## VII. Facility Walk-Through

The table of surface emissions exceedances and digital image log is included as Attachment 1 to this report. A map of the Surface Emissions Monitoring (SEM) path walked by Inspector Rapp with the EPA IRwin is included in Attachment 2.

### A. Morning SEM on Southwest Face of The Landfill

The walkthrough began at about 11:00. The inspection team was escorted by Mr. Macnab and Mr. Caruso. We began the monitoring with one TVA 2020 operated by inspector Skeens, another TVA 2020 operated by Mr. Haulman of ODEQ, and the EPA IRwin operated by Inspector Rapp.

Mr. Macnab estimated that we were over Cell 3 of the landfill. The lower side of the slope was vegetated, and Mr. Macnab stated that they were in the process of getting the vegetated surface of the landfill mowed. We did not measure any exceedances on the lower-vegetated section of the landfill slope. As we moved up the slope of the landfill we began to walk on the 45-mil ethylene propylene diene monomer (EPDM) rubber covered area. The 45-mil EPDM cover is considered interim cover. Mr. Macnab explained that this area would remain covered with 45-mil EPDM until there was either more waste placed in this cell or the area is placed under final cover. The EPDM material is weighed down with sandbags and straps it is also bolted to the surface in places.

We traversed a section of the southwest side of the landfill moving from one penetration to another and monitoring surface emissions along the way. I noticed that when the wind was blowing from the west there was an odor that smelled like landfill gas. There were a number of exceedances, readings of 500 ppm methane or larger, coming from holes or tears in the cover material. I noted that there were a number of plants growing out of the cover material at the top of the western side of the landfill in the area along the edge of Cell 3 and Cell 5. Some of the plants were between 1.5 to 3 feet tall. We did not monitor at the plant locations because of filling activity immediately uphill from that location. We made our way down the landfill slope and continued to take surface emission measurements with the TVAs and the Irwin. We took a break for lunch at approximately 13:00. The Irwin, operated by Inspector Rapp, detected 31 locations where methane emissions were 500 ppm or greater in this section of the landfill. See Attachment 1.

### B. Afternoon SEM at Flare Station

We returned to the facility at 14:30 and performed a calibration bump check on the TVAs and the Irwin which both units passed. See Attachment 3. Mr. Macnab informed us that SCS would be coming the week of June 24th to conduct penetration monitoring. We followed Mr. Macnab in our vehicle to the flare station, the ODEQ representatives joined us for this portion of the afternoon. At the time of our visit, a new enclosed flare was onsite but construction of the flare was not complete and the flare was not operational. I operated the FLIR camera and recorded a

video, FLIR0093, of a leaking flange/blank plate at the flare station. The Irwin measured emissions above 500 ppm at the flange (photo 1734). See Attachment 1. The ODEQ team departed the flare station at approximately 15:00.

### **C. Afternoon SEM at Eastern Face of The Landfill**

We followed Mr. Macnab in our vehicle to a pull-off at the northeastern face of the landfill. There was a noticeable landfill gas odor at the base of the slope. The Irwin measured methane greater than 500ppm at a liquid separation pipe for a horizontal collector. Inspectors Rapp and Skeens monitored surface emissions while we walked up the eastern slope of the landfill. We made our way up the slope walking from one wells or other penetrations to another and monitored surface emissions along the way. We also stopped at areas where visual inspection indicated possible surface emissions such as holes in the cover material. We identified 9 locations with emissions over 500ppm methane along our path. See Attachment 1. The walkthrough ended at approximately 16:00.

### **D. Asbestos**

The inspectors did not observe the asbestos cell due to safety concerns Mr. Macnab expressed during the opening conference.

## **VIII. Closing Conference**

At 16:00, our group returned to the facility conference room to discuss the inspection and conduct the closing conference. I led the closing conference and summarized the parts of the facility we had visited during the inspection and our observations related to CAA. I went through my inspection notes and described potential compliance concerns from the inspection. The following were identified as potential compliance concerns during the closing conference:

1. EPA monitored only a portion of the landfill surface and found numerous methane emissions at 500 ppm and higher, including at holes in the cover material. We identified many of the approximately 40 exceedances at locations where the cover material was damaged. Inspectors had noticed some plants growing out of the cover material near the areas where we monitored for emissions.
2. EPA monitored a flange at the flare station had methane emissions over 500ppm. The facility indicated that they were repairing this flange while we were in the opening conference.
3. One of the wellheads EPA monitored to was open to the atmosphere and the IRwin measured emissions over 500ppm.

Inspector Rapp and I discussed EPA's follow-up from the surface emission monitoring EPA conducted during the inspection. We explained that we would send the locations of the



exceedances and the readings within a week. We explained the 10-day re-monitoring would be due within 10 days following the facility's receipt of the list of exceedances.

I listed the records I needed to further evaluate the facility to Mr. Macnab. I explained that the inspection would not be complete until I have reviewed all the records that the facility submitted, reviewed my notes, and written an inspection report. Inspector Rapp, Skeens, and I thanked the facility representatives for their time and assistance and departed the facility at 16:30.

## IX. Post Inspection Activities

### A. Records Review

The facility provided a response to our information request on August 16, 2023.

**Table 1: Records Review**

#### Records Requested

<b>Electronic copy of a map or maps:</b> <ul style="list-style-type: none"><li>• Including the locations of all wells and an indication of the well type.</li><li>• Indicating the cell outlines on the landfill.</li><li>• Indicating the boundaries of each phase of the landfill.</li><li>• Indicating the most recent planned path for surface emission monitoring, including areas excluded from monitoring.</li></ul>
<b>Response:</b> The facility provided all of the requested maps in an electronic format.
<b>The most recent two quarters of gas migration/perimeter probe readings.</b>
<b>Response:</b> The facility provided monthly readings from January 2024 through July 2024. The permitter probe readings recorded for the last two quarters were all 0.0% methane.
<b>Electronic copy of the most recent design plan.</b>
<b>Response:</b> The facility provided the requested record.

<b>10 most recent ASM-4 for commercial loads.</b>
<b>Response:</b> The facility provided 10 ASN-4 forms.
<b>Last 6 months of landfill cover monitoring records.</b>
<b>Response:</b> The facility provided records for each month from January 2024 through June 2024.
<b>Last three months of all well readings, including all parameters measured. Please provide in an excel readable file type.</b>
<b>Response:</b> The facility provided the requested data.
<b>Odor complaints received in the last 6 months.</b>
<b>Response:</b> The facility provided records covering December 2023 through June 2024, all months had a complaint about odor.
<b>Electronic copy of the two most recent semi-annual (or annual) reports.</b>
<b>Response:</b> The facility provided the two most recent semi-annual reports. One dated February 13, 2024 covering the reporting period of July 1, 2023 through December 31, 2023 and one dated July 16, 2024 covering the reporting period of January 1, 2024 through June 30, 2024.
<b>2 most recent quarterly surface emission monitoring surveys</b>
<b>Response:</b> Facility provided both of the reports we requested.

**B. Surface Emission Monitoring Follow-up**

The facility submitted the following documents on August 23, 2024

SEM Repair tracking – listed repairs but not the date of the repair, see Attachment 5.

Second Quarter Emission Monitoring - June 11, 16, 18, 24, 26, and July 6, 16, and 26, 2024, OAR landfill surface emissions monitoring (SEM) performed by SCS Field Services (SCS) at the Coffin Butte Landfill.

EPA's surface emissions results, received by the facility on June 26, 2024, indicated that forty-one (41) locations exceeded the 500 ppmv maximum concentration. The required first and second 10-day (Oregon Administrative Rule) follow-up monitoring performed by SCS on July 6, and 16, 2024, indicated that not all locations returned below compliance limits as required, following system adjustments and remediation by site personnel. Based on these monitoring results, and in accordance with the Oregon State Regulations, the site is required to perform a system expansion within 120 days of the third detected exceedance or November 13, 2024.

**Attachment 1:        EPA Inspection Photo, Video and SEM Log**

Attachment 1 – EPA Inspection Photo, Video and SEM Log  
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A1	6/21/2024 14:11	6/21/2024 11:11	44.69752	-123.233986	4900	1000	P6210151, P6210152	Exceedance at well
--							P6210153	Photo showing the side of the landfill looking east.
--							P6210154	Photo of a well with cover gathered around the base
A2	6/21/2024 14:21	6/21/2024 11:21	44.697938	-123.234216	10011	3%	n/a	
A3	6/21/2024 14:23	6/21/2024 11:23	44.698045	-123.234395	1271	3700	n/a	
A4	6/21/2024 14:29	6/21/2024 11:29	44.698033	-123.234661	1622	1000	P6210155, P6210156	Exceedance measured at base of well
A5	6/21/2024 14:30	6/21/2024 11:30	44.697969	-123.234744	1459	1600	P6210157	Exceedance at opening in cover
							P6210158	Penetration in cover
A6	6/21/2024 14:33	6/21/2024 11:33	44.698005	-123.235072	14097	>1000	P6210159, P6210160, P6210161	Exceedance located at support on left
A7	6/21/2024 14:35	6/21/2024 11:35	44.698088	-123.235163	16501	20000	P6210163	Exceedance at tear in cover
A8	6/21/2024 14:37	6/21/2024 11:37	44.698123	-123.235294	1118	800	P6210164	Exceedance at vegetation growing out of cover
A9	6/21/2024 14:40	6/21/2024 11:40	44.698127	-123.235513	2719	1.30%	P6210165	Exceedance at tear in cover
A10	6/21/2024 14:41	6/21/2024 11:41	44.698197	-123.23546	4762	1.00%	P6210166, P6210167	Exceedance at tear in cover, at worn patch
A11	6/21/2024 14:42	6/21/2024 11:42	44.698206	-123.23543	8350	20000	P6210167	Exceedance at tear in cover at a rock in background of 167

**Attachment 1 – EPA Inspection Photo, Video and SEM Log**  
**Valley Landfills Inc CAA Inspection 06/21/2024**

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A12	6/21/2024 14:45:00	6/21/2024 11:45	44.69817	-123.235601	1597	2300	camera battery died	
A13	6/21/2024 14:48	6/21/2024 11:48	44.698197	-123.235671	1839	1000		Exceedance at tear in cover
A14	6/21/2024 14:49	6/21/2024 11:49	44.698184	-123.235675	1182	2000		Exceedance at tear in cover
A15	6/21/2024 14:51	6/21/2024 11:51	44.698257	-123.235666	4253	4255		Exceedance at patched area with new hole in cover
A16	6/21/2024 14:52	6/21/2024 11:52	44.6983	-123.235524	9694	TVA flame out		flame out is generally when > 20000
A17	6/21/2024 14:57	6/21/2024 11:57	44.698489	-123.235238	2967	not taken		Exceedance at tarp hole
A18	6/21/2024 15:00	6/21/2024 12:00	44.698836	-123.235078	2900	2200		Exceedance at wellhead cluster
A19	6/21/2024 15:02	6/21/2024 12:02	44.698871	-123.23504	4436	1300		Exceedance at flange
A20	6/21/2024 15:06	6/21/2024 12:06	44.699096	-123.234886	118265	TVA flame out		The cap is off of this well, exceedance at the top.
A21	6/21/2024 15:09	6/21/2024 12:09	44.699247	-123.235311	51151	13000		
A22	6/21/2024 15:11	6/21/2024 12:11	44.699114	-123.23529	1412	1200		
A23	6/21/2024 15:13	6/21/2024 12:13	44.698985	-123.235414	8110	1100		
A24	6/21/2024 15:18	6/21/2024 12:18	44.698458	-123.234777	7443	1200		Exceedance at penetration
A25	6/21/2024 15:21	6/21/2024 12:21	44.698393	-123.234706	8054	12000		Exceedance at BV92
A26	6/21/2024 15:23	6/21/2024 12:23	44.698392	-123.234575	4502	4600		Exceedance at hole in tarp
A27	6/21/2024 15:25	6/21/2024 12:25	44.698351	-123.234173	12969	1.30%		Exceedance at 3V93
A28	6/21/2024 15:28	6/21/2024 12:28	44.698182	-123.23397	4339	2400		Exceedance at hole in tarp, 3V83
A29	6/21/2024 15:31	6/21/2024 12:31	44.698236	-123.233457	55729	>2%		Exceedance at tear at boot where horizontal pipe is coming out of the cover
A30	6/21/2024 15:33	6/21/2024 12:33	44.698186	-123.233425	2368	1800		Exceedance at liquid separation
A31	6/21/2024 15:48	6/21/2024 12:48	44.696522	-123.233878	16740	1.50%		Exceedance at Cell 1 sump, outside of the landfill footprint.
--							FLIR0091	Accidental video
--							FLIR0092	Accidental video

Attachment 1 – EPA Inspection Photo, Video and SEM Log  
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A32	6/21/2024 17:49	6/21/2024 14:49	44.6974	-123.224024	7700	not taken	FLIR0093	Exceedance at Flare Station flange, in video the flange on the right side
--							FLIR0094	Accidental video
--							FLIR0095	Accidental video
A33	6/21/2024 18:14	6/21/2024 15:14	44.701817	-123.22582	6393	2000+	DSCN1734	Exceedance at liquid separation for horizontal
A34	6/21/2024 18:21	6/21/2024 15:21	44.701431	-123.226183	7110	1200	DSCN1735	Exceedance at tear in the material at the base of 5V22
A35	6/21/2024 18:24	6/21/2024 15:24	44.701263	-123.226236	12247	1.30%		
A36	6/21/2024 18:31	6/21/2024 15:31	44.700978	-123.227052	654	10000	DSCN1736	
A37	6/21/2024 18:35	6/21/2024 15:35	44.700853	-123.227144	24738	1.30%		Exceedance at hole in cover
A38	6/21/2024 18:42	6/21/2024 15:42	44.701694	-123.227427	1707	1%		Exceedance at hole in cover
A39	6/21/2024 18:44	6/21/2024 15:44	44.701818	-123.227413	14956	1.15%		Exceedance at 5H26
A40	6/21/2024 18:47	6/21/2024 15:47	44.701819	-123.2274	2675	1.15%	DSCN1737	Exceedance at hole in cover
A41	6/21/2024 18:51	6/21/2024 15:51	44.702381	-123.227485	1057	4000	DSCN1738	Exceedance at tag FD12

**Attachment 2:        EPA Surface Emission Monitoring Map**



June 21, 2024  
Clean Air Act inspection  
Valley Landfills Inc

Legend

EPA Readings >500ppm Methane

Surface Emission Monitoring Path





**Attachment 3: IRwin Calibration**

AED IRWin SX 580-010 92006439

<b>Date:</b>	6/20/2024
<b>Calibration Performed By:</b>	Steve Rapp
<b>Warm-Up Time:</b>	Approx. 15 mins.
<b>Detector Calibrated:</b>	AED IRWin SX 580-010 92006439

<b>Calibration Gas: Methane (CH4)</b>				
<b>Calibration Gas</b>	<b>Calibration Gas Supplier</b>	<b>Calibration Gas Expiration</b>	<b>Lot #</b>	<b>Cylinder #:</b>
Zero gas (0 ppmv CH4)	Pine Environmental Services	6/29/2027	304-402786171-1	UN10021121719481
500 ppmv CH4	Pine Environmental Services	6/29/2027	304-402785850-1	UN19561121719481

<u>Time</u>	<u>Location of Calibration</u>		<u>Notes:</u>	
Approx. 10:45:00 AM	Coffin Butte landfill office building, Carvallis, OR.			
<b>Initial Accuracy Test</b>				
<b>Expected Reading (ppmv CH4)</b>	<b>Zero</b>	<b>500</b>	<b>Notes:</b>	Used demand regulators.
Span Reading	0	500	Accepted/pass	
<b>Calibration/Concentration Check</b>				
<b>Expected Reading (ppmv CH4)</b>	<b>Zero</b>	<b>500</b>		
Instrument Reading	0	500	Accepted/pass	
<b>Bump Check</b>				
Date: 6/21/2024 Time: 14:28				
<b>Expected Reading (ppmv CH4)</b>		<b>500</b>		
Instrument Reading		470	Accepted/pass	
<b>Bump Check</b>				
Date: 6/21/2024 Time: 16:10				
<b>Expected Reading (ppmv CH4)</b>		<b>500</b>		
Instrument Reading		460	Accepted/pass	

<b>Background concentrations (ppmv CH4):</b>		<b>Location:</b>	<b>Time:</b>
<b>Upwind:</b>	0	Measured on road by portable toilets in northeast corner of LF	16:00
<b>Downwind:</b>	0	Measured in parking lot of office building	11:00

**Comments/Notes:**

The instrument was calibrated and checked for response time and precision on 6/20/24 at approx. 7:30 am using the 0 air and 500 ppm CH4 from the same cylinders identified above.

All readings are within 10% of the known calibration value. Response times are approximately 7.1 seconds, under the maximum of 30 seconds.

The gas cylinders identified above were used for the daily calibration and bump checks.

**Precision and Response Time Checks:**

<b>Date:</b>	<b>Time:</b>		<b>Location:</b>
6/20/2024	7:25 AM		Residence Inn, Portland, OR

**AED IRWin SX 580-010 92006439**

	<b>Cal Gas (zero) 0 ppmv</b>		<b>Notes:</b>
	<b>Reading</b>	<b>Time</b>	Demand regulator used.
<b>Trial 1</b>	0		
<b>Trial 2</b>	0		
<b>Trial 3</b>	0		
<b>Average</b>	0		

**AED IRWin SX 580-010 92006439**

	<b>Cal Gas (mid): 500 ppmv CH4</b>		<b>Notes:</b>
	<b>Reading</b>	<b>Time</b>	Demand regulator used.
<b>Trial 1</b>	500	6.78	
<b>Trial 2</b>	500	6.92	
<b>Trial 3</b>	500	7.59	
<b>Average</b>	500	7.1	All readings within 10%. All times within 30 seconds.

**Calibration gas information:**

<b>Gas Concentration (ppmv CH4)</b>	<b>Calibration Gas</b>	<b>Lot #</b>	<b>Cylinder #</b>	<b>Expiration Date</b>	<b>Notes:</b>
0	Pine Environmental Services	304-402786171-1	UN10021121719481	6/29/2027	Pressure = 300 psi. THC < 0.1 ppm, O2 = 20-22%
500	Pine Environmental Services	304-402785850-1	UN19561121719481	6/29/2027	Pressure = 400 psi. 500 ppmv CH4. Air 20.9% O2 in N2.


**Attachment 4:      TVA 2020 Calibration**

# EPA Method 21 Quarterly Precision/Daily Calibration Form

US EPA, Region 10 Monitor: Sara Conley Date: 6/21/24  
Mfg: Thermo Fisher Scientific Model No: TVA 2020 Instrument SN: 2020231270  
Facility: WPH City/State: ICIS No.

Calibration Gas Information					
	Gas Type	ppm	+/- %*	Lot No:	Expiration Date: (M-D-Y)
Calibration Gas 1	O-Air	0	2		
Calibration Gas 2	CH <sub>4</sub>	500	2		
Calibration Gas 3	CH <sub>4</sub>	10,000	2		

\* % that gas is certified to be w/in of the std concentration. (Method-21, Cylinder gas to be certified within  $\pm 2\%$  of std.)

Calibration Standard Test No. 1: <u>0</u> PPM <u>Zero Air</u> Gas						
Test	Test reading	Drift	Total	Avg.	-----	Comments
1	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.1</u>	<u>NA</u>	
2	<u>0.0</u>	<u>0</u>				
3	<u>-0.1</u>	<u>+0.1</u>				
Calibration Standard Test No. 2 <u>500</u> PPM <u>500</u> Gas						
Test	Test reading	Drift	Total	Avg.	*Avg diff w/in $\pm 10\%$ std = Pass	Comments
1	<u>499</u>	<u>1</u>	<u>7</u>	<u>2.3</u>	<u>0.5</u> %	<u>Pass</u> / Fail (circle one)
2	<u>497</u>	<u>3</u>				
3	<u>497</u>	<u>3</u>				
Calibration Standard Test No. 3 <u>10,000</u> PPM <u>10,000</u> Gas						
Test	Reading	Drift	Total	Avg.	*Avg diff w/in $\pm 10\%$ std = Pass	Comments
1	<u>1.02</u>	<u>200</u>	<u>900</u>	<u>300</u>	<u>3</u> %	<u>Pass</u> / Fail (circle one)
2	<u>1.03</u>	<u>300</u>				
3	<u>1.04</u>	<u>400</u>				

\* Avg difference  $\div$  cal gas std  $\times 100 =$  \_\_\_\_\_ %, Unit warm up time  $\geq$  30 min: ☐ Yes, ☐ No

Subpart VVa Drift – Mid Day Reading				Subpart VVa Drift – End of Day Reading			
Cal Gas	Concentration	Reading	*Pass / Fail	Cal Gas	Concentration	Reading	*Pass / Fail
1	<u>0</u>	<u>-0.6</u>	<u>P</u>	1	<u>0</u>	<u>-2.5</u>	
2	<u>500</u>	<u>513</u>	<u>P</u>	2	<u>500</u>	<u>504</u>	
3	<u>10,000</u>	<u>10,800</u>	<u>P</u>	3	<u>10,000</u>	<u>10,400</u>	

\*Negative drift  $> 10\%$  = Fail per 40 CFR 60, Subpart VVa. Fail = monitored data is void. Pass =  $\leq 10\%$  drift.

Response Time W/ extension <input type="radio"/> W/O extension <input type="radio"/>										
Test No.	Cal Std	Response Time	Total Time	Avg. Time	pass/fail $\leq 30$ sec	Cal Std.	Response Time	Total Time	Avg. Time	pass/fail $\leq 30$ sec
1										
2			____ sec	____ sec	Pass / Fail			____ sec.	____ sec.	Pass / Fail
3										

Notes: \_\_\_\_\_

Monitor's Signature \_\_\_\_\_

Date: 6/21/24

**Attachment 5: SEM Repair tracking**

PENETRATION ID	TIMESTAMP	LAT WGS84	LON WGS84	Action
A1	6/21/2024 12:11	44.69752	-123.233986	Damaged well repaired; new kanaflex, added dirt.
A2	6/21/2024 12:21	44.697938	-123.234216	EPDM patch
A3	6/21/2024 12:23	44.698045	-123.234395	EPDM patch
A4	6/21/2024 12:29	44.698033	-123.234661	EPDM patch
A5	6/21/2024 12:30	44.697969	-123.234744	EPDM patch
A6	6/21/2024 12:33	44.698005	-123.235072	EPDM patch
A7	6/21/2024 12:35	44.698088	-123.235163	EPDM patch
A8	6/21/2024 12:37	44.698123	-123.235294	Tarp removed for waste placement
A9	6/21/2024 12:40	44.698127	-123.235513	Tarp removed for waste placement
A10	6/21/2024 12:41	44.698197	-123.23546	Tarp removed for waste placement
A11	6/21/2024 12:42	44.698206	-123.23543	Tarp removed for waste placement
A12	6/21/2024 12:45	44.69817	-123.235601	Tarp removed for waste placement
A13	6/21/2024 12:48	44.698197	-123.235671	Tarp removed for waste placement
A14	6/21/2024 12:49	44.698184	-123.235675	Tarp removed for waste placement
A15	6/21/2024 12:51	44.698257	-123.235666	Tarp removed for waste placement
A16	6/21/2024 12:52	44.6983	-123.235524	Tarp removed for waste placement
A17	6/21/2024 12:57	44.698489	-123.235238	Tarp removed for waste placement
A18	6/21/2024 13:00	44.698836	-123.235078	Tarp removed for waste placement
A19	6/21/2024 13:02	44.698871	-123.23504	Tarp removed for waste placement
A20	6/21/2024 13:06	44.699096	-123.234886	Tarp removed for waste placement
A21	6/21/2024 13:09	44.699247	-123.235311	Tarp removed for waste placement
A22	6/21/2024 13:11	44.699114	-123.23529	Tarp removed for waste placement
A23	6/21/2024 13:13	44.698985	-123.235414	Tarp removed for waste placement
A24	6/21/2024 13:18	44.698458	-123.234777	Tarp removed for waste placement
A25	6/21/2024 13:21	44.698393	-123.234706	EPDM sheet added around and booted
A26	6/21/2024 13:23	44.698392	-123.234575	EPDM boot repaired.
A27	6/21/2024 13:25	44.698351	-123.234173	EPDM patch
A28	6/21/2024 13:28	44.698182	-123.23397	EPDM patch
A29	6/21/2024 13:31	44.698236	-123.233457	EPDM patch
A30	6/21/2024 13:33	44.698186	-123.233425	EPDM patch
A31	6/21/2024 13:48	44.696522	-123.233878	Bolts added/tightened lid on Cell 1 sump
A32	6/21/2024 15:49	44.6974	-123.224024	Blind flange bolts added and tightened
A33	6/21/2024 16:14	44.701817	-123.22582	Soil added
A34	6/21/2024 16:21	44.701431	-123.226183	EPDM patch
A35	6/21/2024 16:24	44.701263	-123.226236	EPDM patch
A36	6/21/2024 16:31	44.700978	-123.227052	EPDM patch
A37	6/21/2024 16:35	44.700853	-123.227144	EPDM patch
A38	6/21/2024 16:42	44.701694	-123.227427	EPDM patch
A39	6/21/2024 16:44	44.701818	-123.227413	EPDM patch
A40	6/21/2024 16:47	44.701819	-123.2274	EPDM patch
A41	6/21/2024 16:51	44.702381	-123.227485	EPDM patch

Please see 2nd Quarter SEM report for remonitoring



PENETRATION ID	TIMESTAMP	LAT WGS84	LON WGS84	Action
A1	6/21/2024 12:11	44.69752	-123.233986	Damaged well repaired; new kanaflex, added dirt.
A2	6/21/2024 12:21	44.697938	-123.234216	EPDM patch
A3	6/21/2024 12:23	44.698045	-123.234395	EPDM patch
A4	6/21/2024 12:29	44.698033	-123.234661	EPDM patch
A5	6/21/2024 12:30	44.697969	-123.234744	EPDM patch
A6	6/21/2024 12:33	44.698005	-123.235072	EPDM patch
A7	6/21/2024 12:35	44.698088	-123.235163	EPDM patch
A8	6/21/2024 12:37	44.698123	-123.235294	Tarp removed for waste placement
A9	6/21/2024 12:40	44.698127	-123.235513	Tarp removed for waste placement
A10	6/21/2024 12:41	44.698197	-123.23546	Tarp removed for waste placement
A11	6/21/2024 12:42	44.698206	-123.23543	Tarp removed for waste placement
A12	6/21/2024 12:45	44.69817	-123.235601	Tarp removed for waste placement
A13	6/21/2024 12:48	44.698197	-123.235671	Tarp removed for waste placement
A14	6/21/2024 12:49	44.698184	-123.235675	Tarp removed for waste placement
A15	6/21/2024 12:51	44.698257	-123.235666	Tarp removed for waste placement
A16	6/21/2024 12:52	44.6983	-123.235524	Tarp removed for waste placement
A17	6/21/2024 12:57	44.698489	-123.235238	Tarp removed for waste placement
A18	6/21/2024 13:00	44.698836	-123.235078	Tarp removed for waste placement
A19	6/21/2024 13:02	44.698871	-123.23504	Tarp removed for waste placement
A20	6/21/2024 13:06	44.699096	-123.234886	Tarp removed for waste placement
A21	6/21/2024 13:09	44.699247	-123.235311	Tarp removed for waste placement
A22	6/21/2024 13:11	44.699114	-123.23529	Tarp removed for waste placement
A23	6/21/2024 13:13	44.698985	-123.235414	Tarp removed for waste placement
A24	6/21/2024 13:18	44.698458	-123.234777	Tarp removed for waste placement
A25	6/21/2024 13:21	44.698393	-123.234706	EPDM sheet added around and booted
A26	6/21/2024 13:23	44.698392	-123.234575	EPDM boot repaired.
A27	6/21/2024 13:25	44.698351	-123.234173	EPDM patch
A28	6/21/2024 13:28	44.698182	-123.23397	EPDM patch
A29	6/21/2024 13:31	44.698236	-123.233457	EPDM patch
A30	6/21/2024 13:33	44.698186	-123.233425	EPDM patch
A31	6/21/2024 13:48	44.696522	-123.233878	Bolts added/tightened lid on Cell 1 sump
A32	6/21/2024 15:49	44.6974	-123.224024	Blind flange bolts added and tightened
A33	6/21/2024 16:14	44.701817	-123.22582	Soil added
A34	6/21/2024 16:21	44.701431	-123.226183	EPDM patch
A35	6/21/2024 16:24	44.701263	-123.226236	EPDM patch
A36	6/21/2024 16:31	44.700978	-123.227052	EPDM patch
A37	6/21/2024 16:35	44.700853	-123.227144	EPDM patch
A38	6/21/2024 16:42	44.701694	-123.227427	EPDM patch
A39	6/21/2024 16:44	44.701818	-123.227413	EPDM patch
A40	6/21/2024 16:47	44.701819	-123.2274	EPDM patch
A41	6/21/2024 16:51	44.702381	-123.227485	EPDM patch

Please see 2nd Quarter SEM report for remonitoring



June 21, 2024  
Clean Air Act inspection  
Valley Landfills Inc

Legend

EPA Readings >500ppm Methane

Surface Emission Monitoring Path





# EPA Method 21 Quarterly Precision/Daily Calibration Form

US EPA, Region 10 Monitor: Sara Conley Date: 6/21/24  
Mfg: Thermo Fisher Scientific Model No: TVA 2020 Instrument SN: 2020231270  
Facility: WPH City/State: ICIS No.

Calibration Gas Information					
	Gas Type	ppm	+/- %*	Lot No:	Expiration Date: (M-D-Y)
Calibration Gas 1	O-Air	0	2		
Calibration Gas 2	CH <sub>4</sub>	500	2		
Calibration Gas 3	CH <sub>4</sub>	10,000	2		

\* % that gas is certified to be w/in of the std concentration. (Method-21, Cylinder gas to be certified within  $\pm 2\%$  of std.)

Calibration Standard Test No. 1: <u>0</u> PPM <u>Zero Air</u> Gas						
Test	Test reading	Drift	Total	Avg.	-----	Comments
1	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.1</u>	<u>NA</u>	
2	<u>0.0</u>	<u>0</u>				
3	<u>-0.1</u>	<u>+0.1</u>				
Calibration Standard Test No. 2 <u>500</u> PPM <u>500</u> Gas						
Test	Test reading	Drift	Total	Avg.	*Avg diff w/in $\pm 10\%$ std = Pass	Comments
1	<u>499</u>	<u>1</u>	<u>7</u>	<u>2.3</u>	<u>0.5</u> %	<u>Pass</u> / Fail (circle one)
2	<u>497</u>	<u>3</u>				
3	<u>497</u>	<u>3</u>				
Calibration Standard Test No. 3 <u>10,000</u> PPM <u>10,000</u> Gas						
Test	Reading	Drift	Total	Avg.	*Avg diff w/in $\pm 10\%$ std = Pass	Comments
1	<u>1.02</u>	<u>200</u>	<u>900</u>	<u>300</u>	<u>3</u> %	<u>Pass</u> / Fail (circle one)
2	<u>1.03</u>	<u>300</u>				
3	<u>1.04</u>	<u>400</u>				

\* Avg difference  $\div$  cal gas std  $\times 100 =$  \_\_\_\_\_ %, Unit warm up time  $\geq$  30 min: ☐ Yes, ☐ No

Subpart VVa Drift – Mid Day Reading				Subpart VVa Drift – End of Day Reading			
Cal Gas	Concentration	Reading	*Pass / Fail	Cal Gas	Concentration	Reading	*Pass / Fail
1	<u>0</u>	<u>-0.6</u>	<u>P</u>	1	<u>0</u>	<u>-2.5</u>	
2	<u>500</u>	<u>513</u>	<u>P</u>	2	<u>500</u>	<u>504</u>	
3	<u>10,000</u>	<u>10,800</u>	<u>P</u>	3	<u>10,000</u>	<u>10,400</u>	

\*Negative drift  $> 10\%$  = Fail per 40 CFR 60, Subpart VVa. Fail = monitored data is void. Pass =  $\leq 10\%$  drift.

Response Time W/ extension <input type="radio"/> W/O extension <input type="radio"/>										
Test No.	Cal Std	Response Time	Total Time	Avg. Time	pass/fail $\leq 30$ sec	Cal Std.	Response Time	Total Time	Avg. Time	pass/fail $\leq 30$ sec
1										
2			____ sec	____ sec	Pass / Fail			____ sec	____ sec	Pass / Fail
3										

Notes: \_\_\_\_\_

Monitor's Signature \_\_\_\_\_

Date: 6/21/24

Attachment 1 – EPA Inspection Photo, Video and SEM Log  
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A1	6/21/2024 14:11	6/21/2024 11:11	44.69752	-123.233986	4900	1000	P6210151, P6210152	Exceedance at well
--							P6210153	Photo showing the side of the landfill looking east.
--							P6210154	Photo of a well with cover gathered around the base
A2	6/21/2024 14:21	6/21/2024 11:21	44.697938	-123.234216	10011	3%	n/a	
A3	6/21/2024 14:23	6/21/2024 11:23	44.698045	-123.234395	1271	3700	n/a	
A4	6/21/2024 14:29	6/21/2024 11:29	44.698033	-123.234661	1622	1000	P6210155, P6210156	Exceedance measured at base of well
A5	6/21/2024 14:30	6/21/2024 11:30	44.697969	-123.234744	1459	1600	P6210157	Exceedance at opening in cover
							P6210158	Penetration in cover
A6	6/21/2024 14:33	6/21/2024 11:33	44.698005	-123.235072	14097	>1000	P6210159, P6210160, P6210161	Exceedance located at support on left
A7	6/21/2024 14:35	6/21/2024 11:35	44.698088	-123.235163	16501	20000	P6210163	Exceedance at tear in cover
A8	6/21/2024 14:37	6/21/2024 11:37	44.698123	-123.235294	1118	800	P6210164	Exceedance at vegetation growing out of cover
A9	6/21/2024 14:40	6/21/2024 11:40	44.698127	-123.235513	2719	1.30%	P6210165	Exceedance at tear in cover
A10	6/21/2024 14:41	6/21/2024 11:41	44.698197	-123.23546	4762	1.00%	P6210166, P6210167	Exceedance at tear in cover, at worn patch
A11	6/21/2024 14:42	6/21/2024 11:42	44.698206	-123.23543	8350	20000	P6210167	Exceedance at tear in cover at a rock in background of 167

**Attachment 1 – EPA Inspection Photo, Video and SEM Log  
Valley Landfills Inc CAA Inspection 06/21/2024**

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A12	6/21/2024 14:45:00	6/21/2024 11:45	44.69817	-123.235601	1597	2300	camera battery died	
A13	6/21/2024 14:48	6/21/2024 11:48	44.698197	-123.235671	1839	1000		Exceedance at tear in cover
A14	6/21/2024 14:49	6/21/2024 11:49	44.698184	-123.235675	1182	2000		Exceedance at tear in cover
A15	6/21/2024 14:51	6/21/2024 11:51	44.698257	-123.235666	4253	4255		Exceedance at patched area with new hole in cover
A16	6/21/2024 14:52	6/21/2024 11:52	44.6983	-123.235524	9694	TVA flame out		flame out is generally when > 20000
A17	6/21/2024 14:57	6/21/2024 11:57	44.698489	-123.235238	2967	not taken		Exceedance at tarp hole
A18	6/21/2024 15:00	6/21/2024 12:00	44.698836	-123.235078	2900	2200		Exceedance at wellhead cluster
A19	6/21/2024 15:02	6/21/2024 12:02	44.698871	-123.23504	4436	1300		Exceedance at flange
A20	6/21/2024 15:06	6/21/2024 12:06	44.699096	-123.234886	118265	TVA flame out		The cap is off of this well, exceedance at the top.
A21	6/21/2024 15:09	6/21/2024 12:09	44.699247	-123.235311	51151	13000		
A22	6/21/2024 15:11	6/21/2024 12:11	44.699114	-123.23529	1412	1200		
A23	6/21/2024 15:13	6/21/2024 12:13	44.698985	-123.235414	8110	1100		
A24	6/21/2024 15:18	6/21/2024 12:18	44.698458	-123.234777	7443	1200		Exceedance at penetration
A25	6/21/2024 15:21	6/21/2024 12:21	44.698393	-123.234706	8054	12000		Exceedance at BV92
A26	6/21/2024 15:23	6/21/2024 12:23	44.698392	-123.234575	4502	4600		Exceedance at hole in tarp
A27	6/21/2024 15:25	6/21/2024 12:25	44.698351	-123.234173	12969	1.30%		Exceedance at 3V93
A28	6/21/2024 15:28	6/21/2024 12:28	44.698182	-123.23397	4339	2400		Exceedance at hole in tarp, 3V83
A29	6/21/2024 15:31	6/21/2024 12:31	44.698236	-123.233457	55729	>2%		Exceedance at tear at boot where horizontal pipe is coming out of the cover
A30	6/21/2024 15:33	6/21/2024 12:33	44.698186	-123.233425	2368	1800		Exceedance at liquid separation
A31	6/21/2024 15:48	6/21/2024 12:48	44.696522	-123.233878	16740	1.50%		Exceedance at Cell 1 sump, outside of the landfill footprint.
--							FLIR0091	Accidental video
--							FLIR0092	Accidental video

Attachment 1 – EPA Inspection Photo, Video and SEM Log  
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A32	6/21/2024 17:49	6/21/2024 14:49	44.6974	-123.224024	7700	not taken	FLIR0093	Exceedance at Flare Station flange, in video the flange on the right side
--							FLIR0094	Accidental video
--							FLIR0095	Accidental video
A33	6/21/2024 18:14	6/21/2024 15:14	44.701817	-123.22582	6393	2000+	DSCN1734	Exceedance at liquid separation for horizontal
A34	6/21/2024 18:21	6/21/2024 15:21	44.701431	-123.226183	7110	1200	DSCN1735	Exceedance at tear in the material at the base of 5V22
A35	6/21/2024 18:24	6/21/2024 15:24	44.701263	-123.226236	12247	1.30%		
A36	6/21/2024 18:31	6/21/2024 15:31	44.700978	-123.227052	654	10000	DSCN1736	
A37	6/21/2024 18:35	6/21/2024 15:35	44.700853	-123.227144	24738	1.30%		Exceedance at hole in cover
A38	6/21/2024 18:42	6/21/2024 15:42	44.701694	-123.227427	1707	1%		Exceedance at hole in cover
A39	6/21/2024 18:44	6/21/2024 15:44	44.701818	-123.227413	14956	1.15%		Exceedance at 5H26
A40	6/21/2024 18:47	6/21/2024 15:47	44.701819	-123.2274	2675	1.15%	DSCN1737	Exceedance at hole in cover
A41	6/21/2024 18:51	6/21/2024 15:51	44.702381	-123.227485	1057	4000	DSCN1738	Exceedance at tag FD12



June 21, 2024  
Clean Air Act inspection  
Valley Landfills Inc

Legend

EPA Readings >500ppm Methane

Surface Emission Monitoring Path







## REGION 10

SEATTLE, WA 98101

### RETURN RECEIPT REQUESTED

Ian Macnab  
Environmental Manager  
Republic Services, Inc.  
28972 Coffin Butte Road  
Corvallis, Oregon 97330

**Re: INFORMATION REQUEST** Regarding Coffin Butte Landfill, Corvallis, Oregon

Dear Ian Macnab:

The U.S. Environmental Protection Agency (EPA), Region 10 seeks information concerning the Coffin Butte Landfill owned or operated by Valley Landfills Inc., a wholly-owned subsidiary of Republic Services, at 2917 Coffin Butte Road in Corvallis, Oregon. The enclosed Information Request is issued to Valley Landfills Inc. pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414.

Under CAA Section 114, 42 U.S.C. § 7414, EPA is authorized to require the submission of records, reports and other information for the purpose of determining whether any violations of the CAA have occurred and for other purposes of the CAA. Valley Landfills Inc. is required to provide information and documents in accordance with the enclosed Information Request within **60 days** of your receipt of the request. If you anticipate being unable to fully respond to this Information Request by the specified date, you may request an extension within **10 days** of receipt of this request. Include a justification for your extension request. If timely submitted, EPA will consider your request and may extend the deadline.

Submit your response to this Information Request or request for extension to:

Sara Conley  
[Conley.sara@epa.gov](mailto:Conley.sara@epa.gov)  
Air Enforcement Officer  
Air Enforcement Section, Enforcement and Compliance Division, EPA Region 10

Please ensure the enclosed Statement of Certification is signed by a duly-authorized officer or agent of Valley Landfills Inc. and returned with the response to this Information Request.

Failure to timely respond fully and truthfully to this Information Request may subject you to civil penalties pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. Your response to this Information Request may be used by EPA in administrative, civil or criminal proceedings.



Thank you for your cooperation. If you have any questions regarding this Information Request or wish to request an extension, please contact Sara Conley, at (206) 553-6914 or [conley.sara@epa.gov](mailto:conley.sara@epa.gov). For legal matters or questions from legal counsel, please contact Brandon Jones-Cobb, in the Office of Regional Counsel, at (206) 553-6917 or [jonescobb.brandon@epa.gov](mailto:jonescobb.brandon@epa.gov).

Sincerely,

Morgan Jencius, Manager  
Air and Land Enforcement Branch  
Enforcement and Compliance Assurance Division

Enclosures

1. Information Request
2. Statement of Certification

cc: Registered Agent – Valley Landfills Inc.  
CT Corporation System

Becka Puskas, J.D.  
Interim Manager, Office of Compliance and Enforcement  
Oregon Department of Environmental Quality

**ENCLOSURE 3**  
**SUBSTANTIATION OF**  
**CONFIDENTIAL BUSINESS INFORMATION CLAIM**

**Republic Services, Valley Landfills Inc.**

EPA is providing you notice that if you assert a claim of business confidentiality for information you provide in response to this Information Request, EPA will determine whether such information is entitled to confidential treatment, pursuant to 40 C.F.R. Part 2, subpart B, including 40 C.F.R. §§ 2.208 and 2.301. If you feel that some or all of the information is entitled to confidential treatment, you must make the showings below with specific reference to those portions of the information you consider confidential.

Please be specific by page (including Bates Stamp, if applicable), paragraph, and sentence when identifying and substantiating the information subject to your claim. Where your claim, as originally made or as modified by your response to this letter, does not include all information on a page, please attach a copy of each such page with brackets around the text that you claim to be CBI. Please note that if a page, document, group, or class of documents claimed by you to be CBI contains a significant amount of information which the EPA Region 10, Office of Regional Counsel determines is not CBI, your CBI claim regarding that page, document, group, or class of documents may be denied. Any information not specifically identified as subject to a confidentiality claim and substantiated as such in your response to this letter may be disclosed to the requester without further notice to you.

In making its final confidentiality determination, the EPA will consider the relevant substantive criteria in its CBI regulations, under 40 C.F.R. § 2.208(a)-(d), as well as the U.S. Supreme Court's decision in *Food Marketing Institute v. Argus Leader Media* (Argus), 139 S. Ct. 2356 (2019), which evaluated the definition of "confidential" as used in Exemption 4. In the Argus decision, the Court held that at least where "[1] commercial or financial information is both customarily and actually treated as private by its owner and [2] provided to the government under an assurance of privacy, the information is 'confidential' within the meaning of Exemption 4." Argus, 139 S. Ct. at 2366.

For each item or class of information that you continue to claim as CBI, please answer the following questions, giving as much detail as possible. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to be entitled to confidential treatment:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. Has EPA, another federal agency, or court made any determination as to the confidentiality of the information? If so, please attach a copy of the determination.
4. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?
4. Is the information contained in any publicly available material such as patents or patent applications, publicly available databases (including state databases), promotional publications, annual reports, or articles?

If you answered "yes," please identify the publicly available information and its location (e.g., patent number or website address).

5. Has your company taken reasonable measures to protect the information claimed as CBI? If so, please identify the measure or internal controls your business has taken to protect the information claimed as confidential:
  - a. Non-disclosure agreement required prior to access. Yes/No
  - b. Access is limited to individuals with a need-to-know. Yes/No
  - c. Information is physically secured (e.g. locked in a room or cabinet) or electronically secured (encrypted, password protected, etc.). Yes/No
  - d. Other internal control measures(s). Yes/No. *(If yes, please explain.)*
6. Does your company customarily keep the information private or closely-held? If so, please explain the basis for your response.
7. At the time you submitted the information you claimed as CBI, did EPA provide any express or implied assurance of confidentiality? If so, please explain the specific assurance(s) you received. For example, expressed assurances indicating that information will not be publicly disclosed could include legal authorities (regulation or statute), direct communications, class determinations, etc. Examples of implicit assurances could include a description of the specific context in which the information was received.
8. Did the Agency provide any expressed or implied indications at the time the information was submitted that EPA would publicly disclose the information?
9. If you believe any submitted information to be a trade secret, please state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be a trade secret.

10. Are there any means by which a member of the public could obtain access to the information or readily discover the information claimed as confidential through reverse engineering?
11. Please explain why the information claimed as confidential is not emissions data under the Clean Air Act.
12. Explain any other issue or additional information you deem relevant to EPA's determination.

Please note that *you bear the burden of substantiating your confidentiality and trade secret claim(s)*. Generalized or conclusory statements will be given little or no weight in EPA's determination on the confidentiality of the information you claim to be CBI.

Your comments must be postmarked or hand delivered to this office, or emailed to Sara Conley [conley.sara@epa.gov](mailto:conley.sara@epa.gov), by the 30<sup>th</sup> day after receipt of this letter. You may seek an extension of time to submit your comments to this office, but the request must be made before the 30<sup>th</sup> day after receipt of this letter. Except in extraordinary circumstances, no extension will be approved. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information.

If you wish to claim any information that you provide in your response to this letter to itself be confidential, you must mark the response "**CONFIDENTIAL**" or with a similar designation, and must bracket all text in the response that you so claim. Information so designated will be disclosed by the EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information provided in your response as confidential, it may be made available to the public.

**ENCLOSURE 1**  
**CAA INFORMATION REQUEST**

**Republic Services, Valley Landfills Inc.**

**A. INSTRUCTIONS**

1. Provide a separate narrative response to each question and subpart of a question in this Information Request. Mark each answer with the number of the question (and subpart, if applicable) to which it corresponds.
2. For each question, provide a copy of each document relied on or referred to in the preparation of the response or that contains information responsive to the question.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. Provide the name, title, and business contact information for each person who prepared or was consulted in the preparation of your response. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained in this Information Request, or who may be able to provide additional responsive documents, provide the name, title, and business contact information for each such person and the additional information or documents that they may have.
5. If you believe a question is not applicable to the Facility, explain the reason for that belief.
6. The information requested must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may assert a confidentiality claim covering part or all of the information submitted, pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414 and 40 C.F.R. Part 2, by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA.

Information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. See 40 C.F.R. § 2.301 for additional rules governing certain information obtained under the CAA. Note that certain categories of information, including "emission data," are not entitled to confidential treatment. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. See also 41 Fed. Reg. 36902 (Sept. 1, 1976).

If you claim all or part of your response as a trade secret, proprietary, or company confidential, please also return with your response a complete substantiation of your claim. Enclosure 3 contains the information you must provide in order to substantiate your claim. If you require additional time to substantiate your confidentiality claim, contact the individuals listed in the cover letter.

**B. DEFINITIONS**

All terms used in this Information Request have their ordinary meaning unless such terms are defined in this Information Request; or 302 of the CAA , 42 U.S.C. §§ 7401 or 7602; or 40 C.F.R. Part 63, Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. For purposes of this Information Request:

1. The terms “you” or “Respondent” mean Republic Services, Coffin Butte Landfill, Valley landfills Inc., and its subsidiaries, officers, directors, managers, partners, employees, contractors, and agents, as applicable.
2. “Abandoned” means, when used in reference to a component of the gas collection system, a component that is no longer operating.
3. “Document” means any object that records, stores, or presents information, and includes, without limitation, email, writings, memoranda, contracts, agreements, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. Include all attachments to or enclosures with any responsive document.
4. “Facility” means the municipal solid waste landfill owned or operated by Respondent located at Highway 99 & Coffin Butte Road Corvallis, OR 97330.
5. “Gas Collectors” means vertical wells, horizontal collectors, or other collection devices capable of collecting and extracting gas at the landfill and meets the requirements of 40 C.F.R § 63.1962 and parallel provisions under the other EPA Landfill Air Regulations.
6. “Gas collection system” means the active or passive system of wells or similar collection components used to collect and move gas at the landfill.
7. “Gas Collection and Control System” or “GCCS” means an active or passive system of wells or similar collection components to move gas at the landfills to associated control devices per the requirements at 40 C.F.R. § 63.1959(b)(ii) and parallel provisions under the other EPA Landfill Air Regulations.
8. “Gas Collection and Control System Design Plan” or “Design Plan,” means a plan that is developed by the landfill and meets the requirements of 40 C.F.R. § 63.1981(d) and parallel provisions under the other EPA Landfill Air Regulations.
9. “Gas Control System” means the systems that treat and/or destroy landfill gases collected by the gas collection system, including but not limited to flares, gas to energy projects, and renewable natural gas plants, as well as any other control devices and treatment systems used to fulfill the control requirements of 40 C.F.R. § 63.1959(b)(2)(iii) and parallel provisions under the other EPA Landfill Air Regulations.
10. “Landfill” means the municipal solid waste (MSW) landfill operated by Republic Services, Coffin Butte Landfill, or Valley Landfills Inc..
11. “Landfill Air Regulations” refers to 40 C.F.R. Part 60, Subpart WWW; 40 C.F.R. Part 60, Subpart XXX; 40 C.F.R. Part 62, Subpart OOO; 40 C.F.R. Part 62, Subpart GGG; 40 C.F.R. Part 63, Subpart AAAA; and State Plans for the Control of Emissions from Existing Municipal Solid Waste Landfills incorporated under 40 C.F.R. Part 62 pursuant to 40 C.F.R. Part 60, Subpart Cf or Cc, as applicable.

12. "LandGEM" means EPA's Landfill Gas Emissions Model, which is an automated estimation tool with a Microsoft Excel interface that can be used to estimate emissions for total landfill gas, methane, carbon dioxide, nonmethane organic compounds, and individual air pollutants from municipal solid waste landfills.
13. "Leachate" means liquids, including landfill gas condensate inside the landfill.
14. "Owner or Operator" means any Person who owns, leases, operates, controls, or supervises the Facility.
15. "Person" or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country), or any other entity, and includes Republic Services, Coffin Butte Landfill, and Valley Landfills Inc.
16. "Surface Emission Monitoring or SEM" means monitoring surface concentrations of methane at collection areas of a landfill, as required by 40 C.F.R. §§ 63.1960(c)&(d) and parallel provisions under the other EPA Landfill Air Regulations.
17. "You and/or Your" means Republic Services, Coffin Butte Landfill, Valley Landfills Inc. and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors, and others who are in possession, custody, or control (actual or constructive) of relevant information that is otherwise available to You or may have obtained information for or on Your behalf.

#### **C. INFORMATION REQUEST**

Provide the following information for the Facility. Unless otherwise specified, provide all responsive information for the time period between January 1, 2022 and the date of this Request.

##### **General Applicability:**

1. Provide the name and address of the legal owner of the Facility. If the owner and operator of the Facility are not the same entity, provide the name and address of the operator of the Facility and provide contracts/legal documents between entities as they relate to ownership, purchase or buy-back agreements and contract operation.
2. Provide copies of any submitted initial or amended design capacity reports.

(As referenced in 40 C.F.R. §§ 63.1981, 63.1983(a) and parallel provisions under EPA's Landfill Air Regulations).

##### **Permits and Applications/Alternatives/Variations/Previous Enforcement:**

3. Provide copies of the following documents for the Facility:
  - a. All permit(s) in effect as of the date of this Request and the permit application(s) You submitted to obtain each such permit;
  - b. Permit application(s) pending as of the date you received this Request; and

- c. The original construction permit(s) and permit application(s). If an original construction permit has been modified, provide the current version of the construction permit.
4. Provide a copy of the following:
  - a. All applicability determination or regulatory interpretation requests to and responses from the Oregon Department of Environmental Quality or EPA;
  - b. All approvals of alternatives to Landfill Air Regulation requirements issued by Oregon Department of Environmental Quality or EPA; and
  - c. Alternative compliance timeline requests to and responses from the Oregon Department of Environmental Quality or EPA.
5. Provide information regarding citizen complaints that the Landfill has knowledge of between January 1, 2022, and the date of this request. The information should include:
  - a. Date and time;
  - b. Location at or near the Landfill which is the subject of the complaint;
  - c. Copy or description of complaint;
  - d. Corrective action or monitoring done as a result; and
  - e. Name and contact information for the person who submitted the complaint.

**Semi-annual/Annual Reports:**

6. Provide the semi-annual and annual reports between January 1, 2022 and the date of this request in an electronic format such as a searchable PDF.

(As referenced in 40 C.F.R. §§ 63.1959(a)-(b), 63.1981(h) and parallel provisions under EPA's Landfill Air Regulations).

**Waste Type and Quantity Data:**

7. Provide the monthly quantity (short tons or megagrams, labeled) of waste accepted at the Landfill between January 1, 2022 and the date of this request, including:
  - a. A breakdown by type of waste (e.g., municipal solid waste, construction and demolition, asbestos, sludge, etc.);
  - b. List the types and quantities of waste that were excluded from the maximum expected gas generation calculation and the rationale for excluding those types of waste; and
  - c. List the types and quantities of waste that are classified as "inert" in facility reports for the Greenhouse Gas Reporting Program pursuant to 40 C.F.R. § 98.346(c).

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. §§ 63.1983(a), (d) and parallel provisions under EPA's Landfill Air Regulations).

**Gas Collection and Control System (GCCS) Design:**



8. Provide a copy of the following documents related to the Design Plan:
- Design Plans in effect at the Landfill since January 1, 2022.
  - Copies of EPA or Oregon Department of Environmental Quality approval, disapproval, or other response to the two most recent Design Plans. If EPA or Oregon Department of Environmental Quality did not provide an approval, disapproval, or other response, provide a statement that EPA or Oregon Department of Environmental Quality approval did not approve, disapprove, or otherwise respond to Valley Landfill Inc's submission of the Design Plan(s).
  - Identification of, and an explanation for, areas excluded from gas collection;
  - A description of the design of the main gas header, including:
    - Maximum rated flow rate capacity;
    - Maximum operating flow rate; and
    - Maximum allowable pressure drop.
  - As-built, final design documents for each flare/blower system. The design documents shall include but not be limited to the following (for each piece of equipment):
    - The manufacturers' expected/design life (years);
    - Minimum and maximum design flare temperatures (°F);
    - The rated maximum flow rate capacity of the flare (standard cubic feet per minute, scfm); and
    - The blower(s) and backup blower(s) rated maximum flow rate at inlet vacuum.
  - Most recent maximum expected gas flow rate calculations, if different from the Design Plan.
    - Include the annual or monthly waste breakdown for every year used in the maximum expected gas flow rate calculations.
    - If LandGEM is used, provide a spreadsheet containing the most recent LandGEM calculation.
    - If LandGEM is not used, provide documentation of the method used to calculate the maximum expected gas flow rate.
    - Include scale house data of waste excluded from LandGEM calculations.

*(As referenced in 40 C.F.R. § 63.1981 and parallel provisions under EPA's Landfill Air Regulations).*

9. Provide report(s) for gas collection and control system stack test(s) and performance test(s), including initial tests, as well as other compliance testing, engineering testing, and testing for general information.

*(As referenced in 40 C.F.R. § 63.1983(b) and parallel provisions under EPA's Landfill Air Regulations).*

**Gas Collection System:**

10. Provide the following information for the gas collection system:
- List of existing and historical Gas Collectors/wellheads and leachate collectors, which are or were connected to the gas collection and control system;
  - For each existing or historical Gas Collector/wellhead or leachate collector that is not in active service collecting landfill gas as of the date of this Request, provide the date on which the Gas Collector/wellhead was taken out of active service and describe the status of the Gas Collector/wellhead, including whether the valve is open or closed, whether the Gas

Collector/wellhead is connected to the GCCS, whether the header lateral has been capped, and whether the Gas Collector/wellhead has been abandoned. Provide documents explaining the basis for each Gas Collector/wellhead abandonment, as well as any approvals issued by EPA or the Oregon Department of Environmental Quality for abandoning the Gas Collector/wellhead;

- c. Indicate whether a Gas Collector is a vertical or horizontal Gas Collector;
- d. Indicate the location of each Gas Collector, both by cell and by GPS coordinates;
- e. Indicate whether each existing Gas Collector has a pump for leachate/water removal;
- f. Indicate higher operating value or alternative operating procedure for Gas Collector;
- g. Installation dates for Gas Collector/wellhead installed between January 1, 2022 and the date of this request; and
- h. From January 1, 2022 to the date of this request, evaluations or analyses, conducted either by you or an external consultant/company, of the gas collection system, including any evaluation or analysis related to:
  - i. Gas Collector placement;
  - ii. Gas Collector depth;
  - iii. Gas Collector density; and
  - iv. Amount of vacuum applied to the Gas Collector/wellhead.

(As referenced in 40 C.F.R. §§ 63.1957-62, 63.1981(d)-(e) and parallel provisions under EPA's Landfill Air Regulations).

11. Provide the current topographic site map(s) displaying the following information:

- a. Gas Collector/wellhead locations and identifiers, including gas laterals and gas headers; and
- b. Areas in which gas collection is not occurring.

(As referenced in 40 C.F.R. § 63.1958(d) and parallel provisions under EPA's Landfill Air Regulations)

#### **Wellhead Monitoring Data:**

12. In an unlocked, Excel-compatible electronic spreadsheet format, provide GCCS monitoring records, including dates, times between January 1, 2022 and the date of this request, including the following:

- a. Monthly GCCS Gas Collector/wellhead measurements, including:
  - i. Methane;
  - ii. Carbon dioxide (CO<sub>2</sub>);
  - iii. Carbon monoxide (CO);
  - iv. Flow rate;
  - v. Oxygen;
  - vi. Nitrogen;
  - vii. Pressure;
  - viii. Temperature; and
  - ix. Notes taken by the technician during monitoring, corrective actions, and re-monitoring measurements.
- b. Monitoring data for each blower, including vacuum;

- c. Gas Collector/wellhead parameter exceedances and corrective actions, including enhanced monitoring due to elevated temperatures, and corrective actions;
- d. Gas Collector/wellhead higher operating values approvals relevant from January 1, 2022 and the date of this request, along with approvals of alternative timelines or corrections in that time; and
- e. A list of Gas Collectors/wellheads not monitored during monthly monitoring and the explanation for exclusion.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. §§ 63.1958(b)-(c), 63.1961, 63.1962, 63.1981, 63.1983, and parallel provisions under EPA's Landfill Air Regulations)

#### **Depth-to-Water and Depth of Perforation Data:**

13. In an unlocked, Excel-compatible spreadsheet(s), provide the following information related to each vertical Gas Collector available between January 1, 2022 and the date of this request:
  - a. Records of measurements of depth to water and/or height of water taken between January 1, 2022 and the date of this Request;
  - b. Documentation of pinches and other obstructions;
  - c. Depth to bottom of the vertical Gas Collector;
  - d. Length of perforated pipe;
  - e. Percentage of perforation; and
  - f. A description of corrective actions taken by the facility as a result of the water level measurements or observation of obstructions, as applicable.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(As referenced in 40 C.F.R. § 63.1962(b)(2), and parallel provisions under EPA's Landfill Air Regulations)

14. Provide a description of standard operating procedures or internal guidelines relating to Gas Collector obstruction and/or dewatering at the Facility.

#### **GCCS Main Header Data:**

15. In an unlocked, Excel-compatible spreadsheet, provide the following landfill gas collection system main header data on an hourly basis from January 1, 2022 and the date of this request:
  - a. Date and hour;
  - b. Average system pressure (inches of water column, in. w.c.);
  - c. Average gas flow rate collected (standard cubic feet per minute, scfm);
  - d. Average landfill gas temperature (degree Fahrenheit, °F); and
  - e. Average methane concentration.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

*(As referenced in 40 C.F.R. § 63.1961(a), and parallel provisions under EPA's Landfill Air Regulations)*

16. Provide gas sampling reports between January 1, 2022 and the date of this request. Your response should include, but not be limited to, sampling done for:
  - a. Methane concentration;
  - b. Sulfur compounds; and
  - c. Hazardous air pollutant (HAP) content.

### **Gas Control System:**

#### **General:**

17. Provide monthly inspection, maintenance, and repair logs and records for each piece of control equipment (e.g., blower/flare system) between January 1, 2022 and the date of this request.

*(As referenced in 40 C.F.R. § 63.1983(c)(7), and parallel provisions under EPA's Landfill Air Regulations)*

18. In an unlocked, Excel-compatible spreadsheet, provide the following monitoring data for each flare between January 1, 2022 and the date of this request:
  - a. Temperature readings;
  - b. Gas flow readings;
  - c. Methane percentages at each flare;
  - d. Operating hours on a monthly basis for each flare;
  - e. Records of bypass incidents at each flare; and
  - f. Monthly SO<sub>2</sub> emissions calculations (tons/month, tons/year) for each flare system with supporting calculations.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

*(As referenced in 40 C.F.R. § 63.1961(b)-(c), and parallel provisions under EPA's Landfill Air Regulations)*

### **Surface Emissions Monitoring (SEM):**

19. Provide SEM records since January 1, 2022. Please make sure units of measurement are clearly indicated. For each monitoring event, include:
  - a. Date(s) and description(s) of the monitoring activity, including identification of the device used;
  - b. SEM data, including but not limited to instrument calibration data, methane concentration at the location of each monitored exceedance marked according to 40 C.F.R. § 63.1960(c)(4)(i), any other recorded methane concentrations, raw instrument data outputs, methane concentration upon re-monitoring at the location of each monitored exceedance; and

- c. Records or descriptions (if the facility does not maintain records) of corrective actions performed in response to each monitored exceedance;
- 20. GPS coordinates, notes, drawings, maps or other records of the actual path traversed by the SEM technician for each quarterly SEM event since January 1, 2022, depicting:
  - a. The monitoring route traveled and any deviations from the 30-meter intervals; and
  - b. Areas excluded from surface emission monitoring (SEM) or exempt from quarterly SEM, including explanation(s) for each area excluded or exempted.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

*(As referenced in 40 C.F.R. § 63.1961(f), and parallel provisions under EPA's Landfill Air Regulations)*

- 21. Records or reports of additional emissions monitoring activities conducted at the direction of the Facility, including but not limited to drone, satellite, and tower-based monitoring, between January 1, 2022 and the date of this request.

**Gas Migration:**

- 22. Provide gas measurements at the gas monitoring probes between January 1, 2022 and the date of this request.
- 23. Provide records of corrective actions taken and remediation plans made in response to methane measurements taken at the gas monitoring probes.
- 24. Provide a map of the gas monitoring probe locations.

*(As referenced in 40 C.F.R. §§ 63.1960(c), 63.1961(f), and parallel provisions under EPA's Landfill Air Regulations)*

**ENCLOSURE 2**  
**STATEMENT OF CERTIFICATION**

Republic Services, Inc.  
28972 Coffin Butte Road  
Corvallis, Oregon 97330

**INFORMATION REQUEST**  
**STATEMENT OF CERTIFICATION**

I certify that the enclosed responses to EPA's Information Request issued to Republic Services, Inc. are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Republic Services, Inc. under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

---

Signature

---

Printed Name

---

Title

---

Date

AED IRWin SX 580-010 92006439

<b>Date:</b>	6/20/2024
<b>Calibration Performed By:</b>	Steve Rapp
<b>Warm-Up Time:</b>	Approx. 15 mins.
<b>Detector Calibrated:</b>	AED IRWin SX 580-010 92006439

<b>Calibration Gas: Methane (CH4)</b>				
<b>Calibration Gas</b>	<b>Calibration Gas Supplier</b>	<b>Calibration Gas Expiration</b>	<b>Lot #</b>	<b>Cylinder #:</b>
Zero gas (0 ppmv CH4)	Pine Environmental Services	6/29/2027	304-402786171-1	UN10021121719481
500 ppmv CH4	Pine Environmental Services	6/29/2027	304-402785850-1	UN19561121719481

<b>Time</b>	<b>Location of Calibration</b>		<b>Notes:</b>	
Approx. 10:45:00 AM	Coffin Butte landfill office building, Carvallis, OR.			
<b>Initial Accuracy Test</b>				
<b>Expected Reading (ppmv CH4)</b>	<b>Zero</b>	<b>500</b>	<b>Notes:</b>	Used demand regulators.
Span Reading	0	500	Accepted/pass	
<b>Calibration/Concentration Check</b>				
<b>Expected Reading (ppmv CH4)</b>	<b>Zero</b>	<b>500</b>		
Instrument Reading	0	500	Accepted/pass	
<b>Bump Check</b>				
Date: 6/21/2024 Time: 14:28				
<b>Expected Reading (ppmv CH4)</b>		<b>500</b>		
Instrument Reading		470	Accepted/pass	
<b>Bump Check</b>				
Date: 6/21/2024 Time: 16:10				
<b>Expected Reading (ppmv CH4)</b>		<b>500</b>		
Instrument Reading		460	Accepted/pass	

<b>Background concentrations (ppmv CH4):</b>		<b>Location:</b>	<b>Time:</b>
<b>Upwind:</b>	0	Measured on road by portable toilets in northeast corner of LF	16:00
<b>Downwind:</b>	0	Measured in parking lot of office building	11:00

**Comments/Notes:**

The instrument was calibrated and checked for response time and precision on 6/20/24 at approx. 7:30 am using the 0 air and 500 ppm CH4 from the same cylinders identified above.

All readings are within 10% of the known calibration value. Response times are approximately 7.1 seconds, under the maximum of 30 seconds.

The gas cylinders identified above were used for the daily calibration and bump checks.

AED IRWin SX 580-010 92006439

<b>Date:</b>	6/20/2024
<b>Calibration Performed By:</b>	Steve Rapp
<b>Warm-Up Time:</b>	Approx. 15 mins.
<b>Detector Calibrated:</b>	AED IRWin SX 580-010 92006439

Calibration Gas: Methane (CH4)				
Calibration Gas	Calibration Gas Supplier	Calibration Gas Expiration	Lot #	Cylinder #:
Zero gas (0 ppmv CH4)	Pine Environmental Services	6/29/2027	304-402786171-1	UN10021121719481
500 ppmv CH4	Pine Environmental Services	6/29/2027	304-402785850-1	UN19561121719481

Time	Location of Calibration		Notes:	
Approx. 10:45:00 AM	Coffin Butte landfill office building, Carvallis, OR.			
<b>Initial Accuracy Test</b>				
<b>Expected Reading (ppmv CH4)</b>	<b>Zero</b>	<b>500</b>	<b>Notes:</b>	Used demand regulators.
Span Reading	0	500	Accepted/pass	
<b>Calibration/Concentration Check</b>				
<b>Expected Reading (ppmv CH4)</b>	<b>Zero</b>	<b>500</b>		
Instrument Reading	0	500	Accepted/pass	
<b>Bump Check</b>				
Date: 6/21/2024 Time: 14:28				
<b>Expected Reading (ppmv CH4)</b>		<b>500</b>		
Instrument Reading		470	Accepted/pass	
<b>Bump Check</b>				
Date: 6/21/2024 Time: 16:10				
<b>Expected Reading (ppmv CH4)</b>		<b>500</b>		
Instrument Reading		460	Accepted/pass	

Background concentrations (ppmv CH4):		Location:	Time:
<b>Upwind:</b>	0	Measured on road by portable toilets in northeast corner of LF	16:00
<b>Downwind:</b>	0	Measured in parking lot of office building	11:00

**Comments/Notes:**

The instrument was calibrated and checked for response time and precision on 6/20/24 at approx. 7:30 am using the 0 air and 500 ppm CH4 from the same cylinders identified above.

All readings are within 10% of the known calibration value. Response times are approximately 7.1 seconds, under the maximum of 30 seconds.

The gas cylinders identified above were used for the daily calibration and bump checks.



**Precision and Response Time Checks:**

<b>Date:</b>	<b>Time:</b>		<b>Location:</b>
6/20/2024	7:25 AM		Residence Inn, Portland, OR

**AED IRWin SX 580-010 92006439**

	<b>Cal Gas (zero) 0 ppmv</b>		<b>Notes:</b>
	<b>Reading</b>	<b>Time</b>	Demand regulator used.
<b>Trial 1</b>	0		
<b>Trial 2</b>	0		
<b>Trial 3</b>	0		
<b>Average</b>	0		

**AED IRWin SX 580-010 92006439**

	<b>Cal Gas (mid): 500 ppmv CH4</b>		<b>Notes:</b>
	<b>Reading</b>	<b>Time</b>	Demand regulator used.
<b>Trial 1</b>	500	6.78	
<b>Trial 2</b>	500	6.92	
<b>Trial 3</b>	500	7.59	
<b>Average</b>	500	7.1	All readings within 10%. All times within 30 seconds.

**Calibration gas information:**

<b>Gas Concentration (ppmv CH4)</b>	<b>Calibration Gas</b>	<b>Lot #</b>	<b>Cylinder #</b>	<b>Expiration Date</b>	<b>Notes:</b>
0	Pine Environmental Services	304-402786171-1	UN10021121719481	6/29/2027	Pressure = 300 psi. THC < 0.1 ppm, O2 = 20-22%
500	Pine Environmental Services	304-402785850-1	UN19561121719481	6/29/2027	Pressure = 400 psi. 500 ppmv CH4. Air 20.9% O2 in N2.














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CAN/ULC-S102 2 FS-10 50-355 B-1602072016













































3V81

ALFA LOMBA - 1000 to bar 150 bar PETROLIUM S.A.D.O. - SAC1000R4





A7

















Example of postcards sent  
by Valley Neighbors for  
Environmental Quality and  
Safety (VNEQS)



**From:** [Debbie P](#)  
**To:** [PAYNE Bailey](#); [Rachel Purcell](#)  
**Subject:** the VNEQS postcards  
**Date:** Monday, February 17, 2025 11:03:13 PM  
**Attachments:** [Postcard1.pdf](#)  
[Postcard2.pdf](#)  
[Postcard-front.pdf](#)

---

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

Hello again Bailey and Rachel,

I wanted to provide complete transparency on the postcard mailers VNEQS sent out last December which Brent Pawlowski took issue with at the last DSAC meeting. We created and mailed out two versions of this postcard - one for neighbors closer to the landfill (Version 1) and another for folks further afield (Version 2). I have attached pdfs of the backs of both postcards, below. (They appear small, but if you select and click the spacebar they will enlarge.) [Front of both postcards was simply our STOP the Landfill Expansion yard sign graphic.]

The purpose of the postcards was to drive people to our website, where they could then learn in greater detail about what is going on. Although we would have liked to, we did not have the budget to send postcards to everyone in Corvallis and the surrounding area, so that is why some folks got it and others did not. Our mailing house helped us select which zip codes to send to.

Regarding the language about leachate being dumped into the Willamette River:

We do not say it is “dumped directly”, which is what Brent was insinuating. But it is not inaccurate to say that it gets dumped in the river, *as that is exactly what happens*. It all ends up in the river eventually - as stated in the photo caption.

On our website, on the Get Up to Speed page, here is the exact language about leachate - and this was vetted by a civil engineer with decades of experience with Corvallis Public Works:

*30 to 35 million gallons of **leachate** per year are trucked to Corvallis and Salem wastewater treatment plants where “treatment” primarily consists of dilution. Diluted leachate is dumped into the Willamette River.*

I hope this helps clarify things for you. We keep the information on our website as factual as possible, hence the reason for our website’s name: [www.CoffinButteFacts.org](http://www.CoffinButteFacts.org)

Please don’t hesitate to reach out if you have questions. If I can’t answer them, I can probably direct you to someone who can. Meanwhile I’ve been wanting to say: Rachel, I think you are doing a great job as the new DSAC chair! Thank you so much for stepping into the role. Ken Eklund was deeply committed, but will be the first to admit he was not cut out for running meetings. He did his best under extenuating circumstances, thrust into the role as he was when no one else wanted it. But I believe he is happy to have passed the torch. And Bailey, please keep up the good work of being responsive to community members when contacted! Want you to know you are both appreciated for what you do.

Regards,  
Debbie Palmer  
for VNEQS

Postcard version 1:

Postcard version 2:

Postcard front:

*Dear neighbors,*

*Republic Services wants to expand the Coffin Butte Landfill, not far from where you live. **IF the landfill expands, these issues - and more - will only get worse:***

### **Your Family's HEALTH may already be at risk**

High volumes of methane and other harmful gases leak out.  
What's all in the odor you smell?

Millions of gallons of toxic leachate per year are dumped in the Willamette River – the agricultural and drinking water supply for many downstream cities, including Adair Village.

### **CLIMATE and ENVIRONMENT are also impacted**

This landfill is a greenhouse gas super-emitter. Dust, noxious gases and toxic leachate affect more than humans. Expect more roadside litter, road damage and truck traffic.

### **PROPERTY VALUES may be at risk too**

The bigger this dump gets, the greater the potential decrease in your property's value as buyers become aware of the health, climate and environmental liability just up the road.

---

**IF REPUBLIC SERVICES IS NOT STOPPED,  
COFFIN BUTTE WILL BE A  
FOREVER-EXPANDING LANDFILL.**

Learn more here: [www.CoffinButteFacts.org](http://www.CoffinButteFacts.org)



Approximately 20 of these tankers **per day** currently leave the landfill full of leachate that eventually ends up in the Willamette River



*Dear neighbors,*

*Republic Services wants to expand the Coffin Butte Landfill, in north Benton County.  
IF it expands, these issues - which impact us all - will only get worse:*

## **People's HEALTH may already be at risk**

High volumes of methane and other harmful gases leak out.  
What's all in the odor you smell?

Millions of gallons of toxic leachate per year are dumped in the Willamette River – agricultural and drinking water supply for several downstream cities, as well as recreational destination for many (swimming, kayaking, fishing).

## **CLIMATE and ENVIRONMENT are also impacted**

This landfill is a greenhouse gas super-emitter. Dust, noxious gases and toxic leachate affect more than humans.

**QUALITY OF LIFE and COMMUNITY will decline** The bigger this dump gets, the more roadside litter, road damage and truck traffic there will be.

---

**IF REPUBLIC SERVICES IS NOT STOPPED,  
COFFIN BUTTE WILL BE A  
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Learn more here: [www.CoffinButteFacts.org](http://www.CoffinButteFacts.org)



Approximately 20 of these tankers **per day** currently leave the landfill full of leachate that eventually ends up in the Willamette River

# **STOP** the **LANDFILL EXPANSION!**



Valley Neighbors  
for Environmental Quality and Safety  
(VNEQS)

**learn more at:**

**CoffinButteFacts.org**

Benton County press  
release sent on 2/28/25





# News Release

## Republic Services' Conditional Use Permit Application Deemed Complete

**February 28, 2025**

The Benton County Planning Division has deemed Republic Services' revised Conditional Use Permit (CUP) application for Coffin Butte landfill as Complete. The application is moving forward to the decision process, which is expected to be completed by Aug. 11, 2025.

Benton County is now working on staff reports to give to the [Planning Commission](#) and agency referral partners who will review the application and make recommendations. When the reports are complete, the County will set the dates for a two-week public comment period and a hearing before the Planning Commission, a group of seven volunteers from throughout the County appointed by the Board of Commissioners.

The Planning Commission meets on the first and third Tuesdays of every month in the Kalapuya Building at 4500 SW Research Way in Corvallis. All meetings are open to the public. While the hearing date for Republic Services' application has not been set, the County expects that it will not happen before April 1, 2025. To meet the Aug. 11 deadline, the hearing should happen no later than May 6, 2025.

As soon as the hearing and public comment dates are set, notification will be sent to all who signed up as Interested Parties through the Community Development webpages. The County will also communicate the schedule through the website, a press release, and emails to the County's general interest contact list and solid waste process special interest list.

View Republic Services' CUP application online:

- [Landfill expansion application](#) (submitted July 19, 2024)
- [Revised application](#) (submitted Oct. 30, 2024)

- [Additional information](#) (submitted Jan. 15, 2025)

To learn more about the decision process visit [bentoncountyor.gov/coffin-butte-landfill](https://bentoncountyor.gov/coffin-butte-landfill).

## CONTACT

Benton County Public Information Office

541-766-6843

[pioinfo@bentoncountyor.gov](mailto:pioinfo@bentoncountyor.gov)



At your service,  
*every day.*

# Community Concerns Received Since Last Meeting

Date Received	Concern Summary	Method Received	Response
2/3/25	<p>I am writing to you to express my serious and urgent concerns about Coffin Butte Landfill. We live only a few miles from this public hazard, and we have several concerns.</p> <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Water Quality</li> <li>• Truck Traffic</li> <li>• Pollution</li> </ul> <p>• Air Quality: We smell the stench of this rotting mass quite regularly. The methane smell and the smell of rotting garbage cannot be good for our health, our neighbors, or the community.</p> <p>• Water Quality: I am very concerned about our water quality. With all the leachates being generated from the landfill, it is only a matter of time before ours and other wells are contaminated.</p> <p>• Truck Traffic: It is one thing to have the truck traffic required to serve the needs of our own community, but the number of trucks coming from all over the state, bring a level of congestion, pollution and added danger to our local roads and Highway 99.</p> <p>• Pollution: The amount of litter that spills out of the trucks heading to the landfill is mind boggling. Highway 99 is of course the worst, but so our other roads of approach, Granger Road, Arnold, and other roads in and around Adair Village. The litter is rarely picked up. It is a blight on our neighborhoods and our community at large. Nothing like saying welcome to Corvallis or Welcome to Benton County than a litter strewn Highway, truck traffic and a large pile of garbage.</p> <p>I implore you to please not expand the Landfill. There is no amount of money Benton County could make on this endeavor that won't be eaten up by the lawsuits associated with well contamination, and excess methane emissions, loss of property value. Inviting other counties to utilize this dump is inviting environmental disaster. Landfills are better suited for dry climates, not our extremely wet one. The Coffin Butte Landfill is like the County owning a ticking timebomb of pollution, well contamination, degradation, and lawsuits. Please Stop the Expansion!</p>	Letter	Responded and added concerns to the complaint log.



2/3/25	Same complaint submitted above by another resident.	Email	Bailey logged their complaint and thanked them for sending it.
2/4/25	I filed a complaint with DEQ this morning about very bad acrid landfill odor at my house. I tried to file a complaint at Republic Services Coffin Butte Landfill website, but no longer see any link to file a complaint. I am therefore, filing my complaint with you.	Email	Bailey logged their complaint and thanked them for sending it.
2/4/25	<p>Dear Commissioners Wyse, Malone, and Shepherd,</p> <p>First, thank you, Commissioner Wyse, for taking the time to talk with me after last week's town hall in Philomath.</p> <p>Per your suggestion, I am sending you some thoughts and concerns regarding our trash, and what we do with it.</p> <p>From what I have been able to discover, other Oregon counties have proactive plans for managing waste.</p> <p>In Yamhill County, citizens opposed to the expansion of their regional landfill took the issue to the Land Use Board of Appeals, who agreed with them. They then had to sue the landfill in order to get it to close. Meanwhile, they set a goal for Zero Waste and are actively taking aggressive steps to meet their goal.</p> <p>Lane County recently announced plans to build and operate the most advanced integrated reuse and recycling facility in the nation.</p> <p>Polk County is looking into building a waste transfer station, to break their dependence on Coffin Butte Landfill.</p> <p>Metro Portland decided, years ago, that sending trash to landfills in the Willamette Valley went against their stated values of protecting the environment. Because the Valley supports one of the most productive ag economies in the nation, they decided it was an irrevocably bad idea to dump their trash in the garden where farmers grow their food, so they took a moral stance to guide their waste policies.</p> <p>Closer to home, we have obvious problems with the Coffin Butte Landfill.</p> <p>Benton County planning documents clearly state specific goals for waste management and waste reduction (BCC Ch. 23). The franchise agreement with Republic Services includes those and other environmental goals, but extensive evidence shows that Republic is failing to meet its legal obligations.</p> <p>Perhaps they are more concerned with financial gain than they are with meeting their goals? There is certainly evidence in that direction as</p>	Email	Commissioner Wyse responded.

well: In August of '22, Forbes Magazine quoted investment manager Michael Hoffman as saying that garbage "is capital-intensive and [while] it's not compounding at 20% per year like software...for the big players it's become an extraordinarily repeatable and inflation-resistant business." Goals like "waste reduction" don't generate income as quickly or easily as waste collection and disposal.

Cascade Investments (Bill Gates' personal holding company), has a 34% stake in Republic's business. According to Forbes, it earns more than \$200M/year from it's investment — profits that are paid by the residents of 1/3 of the state of Oregon; profits that also leave the state, never to return.

Meanwhile, Benton County residents face a future in which we will have to pay all the costs of managing the consequences of storing all the waste collected in Coffin Butte — consequences which include (and will quickly exceed) a host of already well-documented problems:

- dangerous methane leaks (methane, of course, being a potent greenhouse gas, highly flammable and clear and present fire risk in a heavily wooded area),
- continuing release of noxious and dangerous fumes and gases
- millions of gallons of toxic leachate (currently being dumped into our rivers, essentially untreated and full of heavy metals and PFAS (aka "forever chemicals").)
- arsenic leaching into well water,
- illegally dumped and buried toxic wastes,
- continuing surprise fires

The agreement with Republic Services requires insurance coverage merely equal to the liability coverage for 15 average single family homes. How can this amount cover the consequences of dealing with decades of trash from 1/3 of the entire state? And after the landfill closes, the agreement effectively terminates any liability for the contractor at all! Clearly, the consequences of waste disposal will be borne by the public.

Every citizen generates waste that will need collection and disposal, and every citizen needs a safe, clean, and healthy environment that will protect them against pollution, wildfire, and economic hardship. So it seems only logical that our government has an urgent obligation to serve those needs in the best way possible. Currently, however, we're hog-tied by a contract that allows an outside, private entity to make undisclosed gains without regard for the damages incurred against the present and future interests of local citizens.

Does such a situation not put us in a profoundly dangerous situation?

My question, then, is simple: If we, as a county, contract for services to meet specific goals, and if the contractor consistently fails to meet those goals, why are we continuing the contract? Especially when there is both

	<p>precedent and example for better solutions to the overall problem of a “throw-away” society?</p> <p>It seems to me we need to look beyond the interests of out-of-state entities who convert our trash to their cash. We need to look past the intricacies and minutiae of bureaucracy. We need to serve the immediate and profound needs of all your constituents — all our children, grandchildren, and all future generations.</p> <p>Obviously, these issues and concerns extend beyond the bounds of the specific agreement with Republic Services, and won’t be answered quickly and/or easily. It will take a long conversation, free of the “interests” of outside parties who have no long-term stake in or commitment to the long-term outcomes. The responsibility is ours.</p> <p>But as clear as the situation seems to me, it’s also clear to me that between citizens and government, we have the capacity to significantly and effectively address the situation so that our descendants will remember us with gratitude, for addressing needs they will have after we are all long dead.</p> <p>With sincere thanks for your service (and for reading this long email!)</p>		
2/19/25	<p>Dear Commissioners - I have submitted numerous odor complaints to the DEQ website regarding the impactful dump odors - with no response and obviously DEQ is not interested in doing anything to stop the odors. Even going outside to add food to the bird feeders, it smacks you right in the face. It's truly depressing.</p> <p>So, from now on, when I have a moment, I will just drop you a line to let you know that I am thinking about you on the ever-increasing number of dump days, and maybe you can think about the climate change and ongoing environmental impacts caused by hosting this massive dump in our County.</p>	Email	Commissioner Wyse responded.
2/21/25	<p>The garbage on highway 99 about 6 miles on either side of the landfill is atrocious. I cannot believe how much trash gets left and not picked up . I see Republic Services trucks shedding garbage as they drive down the highway. Can you please send someone out to pick up the trash? We feel like we live in a dump. Also please don't expand the landfill either. It's not being dealt with properly now how could we ever expect them to do it after an unnecessary expansion?</p>	Email	<p>Bailey responded by sharing information about the increased litter patrols. Encouraged them to also report to RS through their complaint form. I shared this complaint with the DSAC and RS.</p>



2/26/25	Resident called to report a significant amount of litter on Camp Adair Road.	Email	Bailey took his call and explained that the litter patrols have been increased to 4 times/month. Bailey spoke to Republic Services who said that they recently cleaned this stretch of road. The original complaintant emailed again on 3/3/25, noting that the litter had been cleaned up.
2/27/25	Contractor called to complain that Republic Services is hard to find a local contact and is unhappy with the calls being sent to Phoenix. He said that he called with a question about contaminated soils and has not received a call back after 3 days. He also said that the wait time at Coffin Butte is too long.	Call	Bailey let him know that I will relay his complaint to Republic Services which happened on 2/27/25.

# Relevant News Articles

## Since Last Meeting

2/25/2025	Statesman Journal	<a href="https://www.statesmanjournal.com/story/news/politics/2025/02/25/oregon-senate-bill-726-landfill-monitoring/79433732007/?utm_source=psal-DailyBriefing&amp;utm_medium=email&amp;utm_campaign=daily-briefing&amp;utm_term=Content%20List%20-%20Stacking%20-%20optimized&amp;utm_content=1074SJ-E-NLETTER65">https://www.statesmanjournal.com/story/news/politics/2025/02/25/oregon-senate-bill-726-landfill-monitoring/79433732007/?utm_source=psal-DailyBriefing&amp;utm_medium=email&amp;utm_campaign=daily-briefing&amp;utm_term=Content%20List%20-%20Stacking%20-%20optimized&amp;utm_content=1074SJ-E-NLETTER65</a>	Landfills - Methane	Oregon legislation would require aerial, drone or satellite landfill monitoring
2/19/2025	Statesman Journal	<a href="https://www.statesmanjournal.com/story/news/2025/02/19/oregon-legislature-bill-composting-food-waste/78656411007/">https://www.statesmanjournal.com/story/news/2025/02/19/oregon-legislature-bill-composting-food-waste/78656411007/</a>	Landfills - Food	Oregon may require farms, producers, hospitals, schools others to compost food waste