### Packet for meeting on September 12, 2025

### **Contents:**

- 1. Agenda
- 2. Draft meeting minutes from 9/10/25
- 3. Notes from sub-committee meetings
- 4. Community concerns received from 7/1/25 9/6/25
- 5. Relevant news articles and additional information

### 2026 DSAC Meetings

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### 1) Agenda



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

## Disposal Site Advisory Committee (DSAC) AGENDA November 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=EQu4Ofo6VVJNGuVr9KmWhTx96R6LKs.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	Торіс	Speaker(s)
1	6:00 p.m.	5 min.	Call to Order and welcome new members	Chair
2	6:05 p.m.	15 min.	Public comment – your comments welcome. Each commenter is generally limited to 3 minutes.	Public
3	6:20 p.m.	10 min.	Update on LU-24-027	Staff
4	6:30 p.m.	5 min.	Review and approve the draft of the last meeting's minutes and action items.	Committee
5	6:35 p.m.	10 min.	Fire Safety - update	David H.
6	6:45 p.m.	15 min.	Updates from Sub-Committees  Odors, Methane, Title V permit Groundwater, Leachate Community Engagement	Committee
7	7:00 p.m.	5 min.	Break	Committee
8	7:05 p.m.	20 min.	Gas sampling wells and DEQ Pre-Enforcement Notice	David H.
9	7:25 p.m.	10 min.	Landfill end-of-life projections	Paul K.
10	7:35 p.m.	10 min.	DSAC membership	Staff
11	7:45 p.m.	5 min.	Request Agenda Items, staff requests for next meeting	Committee
12	7:50 p.m.	5 min.	Next meeting/wrap up/adjourn	Chair



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

### **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	Peter Petersen	1/1/25 - 12/31/26	
Brent Pawlowski	1/1/24 - 12/31/25	Dianne Cassidy	1/1/24 - 12/31/25	
David Livesay	10/1/24 - 12/31/25	Robert Kipper	1/1/24 - 12/31/25	
Charlene Carroll	10/1/24 - 12/31/26			
Benton County Staff				
Bailey Payne, Solid Waste Program Coordinator				

### **DSAC Members Excused:**

### **Sub-committees:**

- Odors, Methane, Title V permit David H., Jennifer F.
- Groundwater, Leachate David L., Charli C., Peter P.
- Community Engagement Dianne C., Robert K.

Next DSAC Meetings: January 14, 2026

## 2) Draft meeting minutes from last meeting



### MEETING MINUTES Disposal Site Advisory Committee (DSAC) September 10, 2025

Benton County DSAC Vice Chair, David Hackleman, called the meeting to order at 6:00 P.M. The meeting was open to the public virtually via a published Zoom link. These minutes were made with the assistance of artificial intelligence.

### **COMMITTEE MEMBERS ATTENDING**

# Rachel Purcell, Chair (Excused) David Hackleman, Vice-Chair Jennifer Field (Excused) Chuck Gilbert Brent Pawlowski (absent) Charlene Carroll David Livesay (Excused) Paul Koster, Republic Services Robert Kipper

### **STAFF**

Bailey Payne, Solid Waste Program Coordinator

### **GUESTS**

Peter Peterson Diane Cassidy

Julie Jackson, Republic Services

### Key takeaways

- Republic Services has appealed the Planning Commission's denial of the landfill expansion; the Board of Commissioners will review on October 22-23 at the fairgrounds.
- Republic Services reported only 8 actual fires at the landfill over a 13-year period (2013-2025), contradicting claims of "20+ fires" made during CP hearings. A letter from the Adair Rural Fire Department documenting fire responses is included in the meeting packet.
- Republic does not plan to implement additional fire monitoring or suppression systems at this time.
- The Odor & Methane Subcommittee is exploring options for perimeter detectors to better identify odor sources.
- The Groundwater Subcommittee is awaiting a copy of a revised monitoring program that DEQ is currently reviewing.

- The Community Outreach Subcommittee is working to improve the complaint reporting system,
   recommending a more prominent "Report a Concern" button on the Coffin Butte website.
- Nine committee members' terms expire at the end of 2025; members need to inform the chair if they wish to continue serving.

### **Landfill Expansion Update**

- Bailey: The Planning Commission denied the expansion. Republic Services has appealed, and it will go to the Board of Commissioners, likely on October 22-23 at the fairgrounds.
- Committee members: Discussed how the public will be notified about the upcoming hearings and comment periods.

### Conclusion

- o Bailey will inform the DSAC when he learns more about the public comment process.
- o The Board of Commissioners will review the record and accept additional testimony.

### Fire Safety at the Landfill

- Paul: Presented findings from Mike Larkin (fire department) showing only 19 calls over 13 years, with only 8 actual fires. The other 11 were false alarms related to methane flares.
- Paul: Only 2 fires occurred since 2017
- Committee members: Questioned whether additional monitoring during red flag warnings would be prudent.
- Paul: Stated that Republic does not feel additional fire monitoring is necessary given the data and their current safety practices.

### Conclusion

- Republic Services will not implement additional fire monitoring or suppression systems at this time, including "red flag" days.
- The committee chair will write a note to the county expressing concerns about the lack of monitoring outside operating hours.

### **Odor & Methane Monitoring**

 David H.: Reported that the subcommittee met at the top of Coffin Butte to discuss methane and odors. Proposed perimeter detectors to better identify odor sources (landfill vs. PRC).

- Paul: Noted that analyzers cost \$30,000-\$50,000 each, require daily calibration, and monitoring trailers cost \$250,000-\$500,000 per year.
- David H.: Mentioned exploring whether OSU graduate students might assist with sampling and analysis.

### Conclusion

- o The subcommittee will continue investigating options for odor monitoring and analysis.
- o They will explore the possibility of working with OSU graduate students.

### **Groundwater Monitoring**

- Charlie: Reported that the subcommittee met with Seth Sadofsky of DEQ to review concerns about monitoring wells.
- o **Peter**: Learned that DEQ is reviewing a revised monitoring program from Republic Services.
- o Bailey: Requested a copy of this revised plan two weeks ago but hasn't received it yet.

### Conclusion

- o The subcommittee is awaiting the revised monitoring program document.
- Paul offered to have a groundwater expert speak to the committee.

### **Community Outreach & Complaint Reporting**

- Dianne: Analyzed the 2024 community concerns report and found 50% of complaints came through DEQ.
- Paul: Noted that complaints coming through DEQ often arrive a day or more later, making investigation difficult.
- Julie: Recommended adding a prominent "Report a Concern" button on the Coffin Butte website homepage.
- Charlie: Pointed out that the Republic Services website doesn't clearly direct people to the Coffin Butte landfill site.

### Conclusion

- Julie is working with the website team to improve navigation and reporting options.
- The committee will work to educate the public about the most effective ways to report concerns.
- o Bailey will contact Laura at DEQ to encourage directing people to the Coffin Butte website.

### **Committee Membership**

- Chair: Noted that nine committee members' terms expire at the end of 2025.
- Chair: Asked members to inform him, Chair Purcell and Bailey if they wish to continue serving.

### Conclusion

- o Members should notify the chair about their intentions to continue or step down.
- Recruitment may be needed to fill vacancies.

### Challenges

- Determining the most effective way to monitor for fires at the landfill when it's not in operation.
- Finding cost-effective methods to monitor and identify odor sources.
- Improving public awareness about the proper channels for reporting concerns.
- Ensuring timely investigation of odor complaints that come through DEQ.
- Obtaining the revised groundwater monitoring program from DEQ for review.

Meeting Adjournment: The meeting was adjourned at 7:30pm (Robert K., Dianne)

Next Meeting: Wednesday, November 12, 2025

### **Action items**

### Bailey

- Send another request for the revised groundwater monitoring program.
- Contact Laura at DEQ about directing people to the Coffin Butte website for complaints.
- o Check if the 2024 annual report will be presented to DSAC before going to the Board.

### David H.

- Write a note to the county expressing concerns about the lack of fire monitoring outside operating hours.
- o Collect information from members about their intentions to continue on the committee.

### Julie

- Continue working with the website team to improve the complaint reporting system.
- Follow up on adding a "Report a Concern" button to the Coffin Butte website homepage.

### Paul

- Consider discussing red flag warning protocols internally.
- Arrange for the groundwater expert to speak to the committee if approved internally.

### Odor & Methane Subcommittee

- Explore the possibility of working with OSU graduate students on odor monitoring.
- Investigate the cost and feasibility of perimeter detectors.

## 3) Minutes from Subcommittees

Summary of Odors and PFAS committee meeting of 13 October, 2025

We wish to submit this report to the committee as a whole (BCDSAC) at our meeting in November.

To: Rachel Purcell, Chair Benton County Disposal Site Advisory Committee Bailey Payne, Benton County Solid Waste Program Coordinator

From: David Hackleman & Jennifer Field, Odors/PFAS subcommittee

Goal: Develop a method to determine if odors and emissions emitted from the landfill are the cause of odor complaints from the local public. Step one is to obtain identifying "fingerprint spectra" of the atmospheric emissions from both Coffin Butte landfill and the Pacific Region Compost (PRC) facility sites.

Our meeting convened on 13 October 2025 at the laboratory of Dr. Field at 10 am. We concluded our meeting at approximately noon. In attendance were also a colleague of Dr. Field as well as a PhD Student in her laboratory. A tour (for Dr. Hackleman's benefit) was performed outlining the Analytical Test equipment within Dr. Field's laboratory. Along with a gas chromatograph interfaced with high resolution mass spectrometer (GC-HRMS) that is designed to detect and identify PFAS and most other volatile organic compounds (VOCs) within air, water, and soil samples was a thermal desorption unit designed to capture VOCs on a sorbent held within a tube that is analyzed by thermally desorbing the VOCs into the GC-HRMS. Through the use of proper and well prescribed air sampling techniques, these instruments coupled with expertise of the laboratory here at OSU, we are confident that we can obtain both "volatile fingerprints" and identify the major odor-causing components being emitted into the atmosphere at both the Coffin Butte Landfill and the PRC facility. To the best of our knowledge, no such survey has ever been performed at the Coffin Butte Landfill nor at the Pacific Region Compost facility.

The most straightforward method of obtaining these measurements is to take air samples directly at each of these two sites at or near areas known to be emitting detectable gases. Significant methane emission measurements have been performed from remote monitoring devices and could be used to identify key sites for such measurements. Conversations at the last BCDSAC meeting discussing such measurements were responded to by the Republic Representatives that they were not willing to authorize sampling by any external team on the Landfill Site as they were concerned about the team's safety. This argument can be easily be debated since the team would be performing the simple task of drawing air samples above the landfill while standing on the existing polymeric fabric, and hence be exposed to no more danger than employees of the landfill.

In the event we are unable to gain access to the landfill site, we believe that we can still obtain samples from the periphery of the landfill, particularly on days in which wind is

conveying the gases in the direction of the sampling site. Calculation of the dilution effects of such remote sampling will be performed.

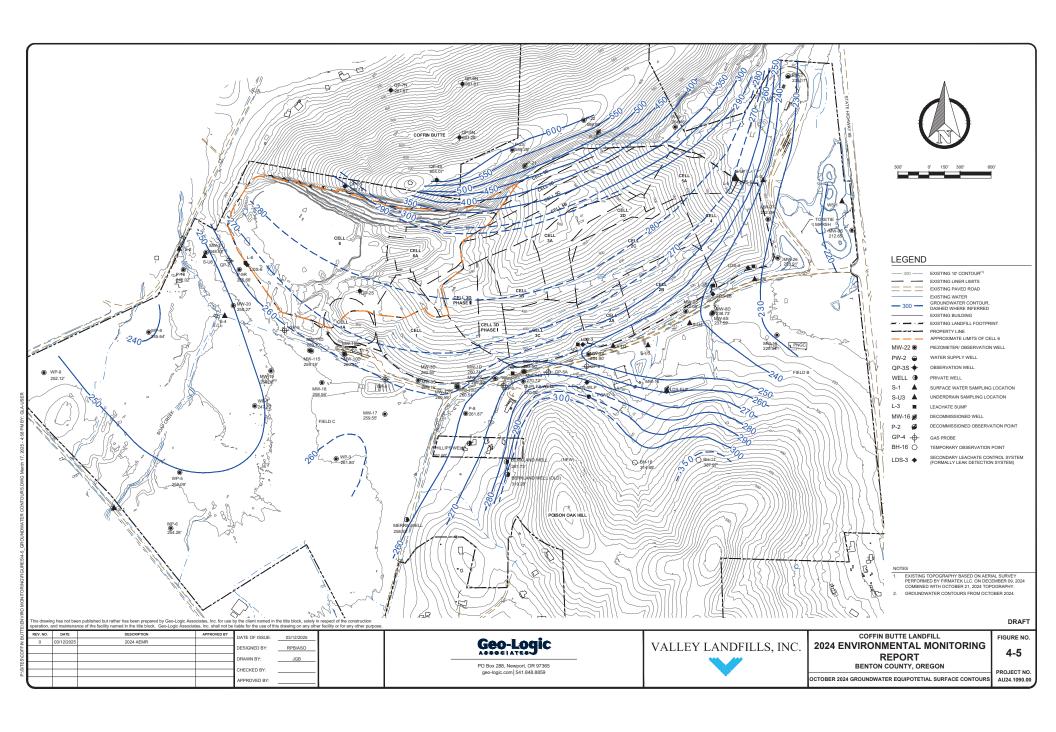
Conclusion: We wish to go ahead and obtain a small set of air samples at or near each of these two sites and then analyze them to obtain their volatile 'fingerprints'. This is only an exploratory measurement set as the composition of emissions likely varies depending on the material placed in the landfill and composting site as well as ambient conditions such as wind, rain, temperature and solar influx. Once we have a small set of samples, we can then determine whether we need to do periodic monitoring and how best to achieve such monitoring if deemed necessary.

Cost: As Republic is not interested in supporting this type of measurement of the emissions of the landfill, it falls on us, the County, to financially support the study.

### Actions:

- 1. Dr. Field is preparing a grant proposal to be sent to appropriate entities to fund a study centered around PFAS measurements but also to include the Fingerprint spectra work. We estimate this proposal will be on the order of \$250,000. Should this grant be funded, it will be able to provide sufficient funds for the work. To be successful, a short summary of the proposed work must first pass a preliminary screening. Subsequently, a full proposal may be requested. If we can have some exploratory sample information for the full grant proposal submission, that will greatly benefit the likelihood of success in obtaining the grant.
- 2. Dr. Hackleman is to send an appeal through Mr. Payne for a modest sum to cover the costs of one graduate student collecting a few exploratory samples and analyzing them. To provide living expenses and laboratory supplies for this exploratory work, it is estimated that \$15,000 is needed.

Sincerely, Dr. Jennifer Field, Dr. David Hackleman



Second quarter surface emissions was conducted in June 2025. Waiting for the report from the third-party contractor.

# 4) DEQ Pre-Enforcement Notice to Valley Landfills (Coffin Butte Landfill)

November 6, 2025

The Oregon Department of Environmental Quality issued a <u>pre-enforcement notice</u> today to Coffin Butte Landfill, which is owned and operated by Valley Landfills Inc. The facility is located north of Corvallis along Highway 99W.

The pre-enforcement notice addresses air quality compliance issues identified through document reviews and inspections conducted by the U.S. Environmental Protection Agency and DEQ in June 2022, June 2024, and through further analysis completed in fall 2025. In the notice, DEQ outlines the violations, requests additional information, and directs the company to take corrective actions. The pre-enforcement notice doesn't establish a civil penalty or include orders.

The pre-enforcement notice serves as formal notification that the matter is being referred to DEQ's Office of Compliance and Enforcement for a formal enforcement order and penalty assessment, which is expected in the coming months.

For more information about DEQ's regulation of the landfill please visit our <u>Coffin Butte Landfill web</u> page.

Please let me know if you have any questions.

Thank you,

Mary Camarata
Regional Solutions Coordinator
Oregon Department of Environmental Quality
165 E. 7th Ave, Suite 100, Eugene, OR 97401
503.983.2277 (Mobile)
541.686.7551 (Fax)
Mary.Camarata@deq.oregon.gov



### **Department of Environmental Quality**

Western Region Salem Office 4026 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-8240 FAX (503) 373-7944 TTY 711

Nov. 6, 2025

Bret Davis Valley Landfills Inc. Coffin Butte Road Corvallis, OR 97330

RE: Pre-Enforcement Notice

Valley Landfills Inc. 2025-PEN-10025 02-9502-TV-01 Benton County

### Dear Bret Davis:

This Pre-Enforcement Notice (PEN) addresses landfill gas emissions compliance issues at the Coffin Butte Landfill located at Highway 99W and Coffin Butte Road north of Corvallis. In June 2022 and June 2024, the U. S. Environmental Protection Agency (EPA) conducted air quality inspections at the landfill. During both of these inspections, EPA performed surface emissions monitoring on parts of the landfill using an instrument that measures methane. EPA recorded a significant number of exceedances of the 500 parts per million (ppm) standard for methane. While these exceedances are not violations in and of themselves, they trigger required corrective actions to ensure the landfill's gas collection and control system is adequately sized and functioning properly. Following the 2024 inspection, EPA requested records from Valley Landfills Inc. (VLI) to evaluate compliance with landfill gas requirements. In May 2025, VLI submitted the requested records to EPA, and in Oct. 2025, EPA formally referred the matter to the Oregon Department of Environmental Quality (DEQ) for enforcement.

Since Sept. 27, 2021, the Coffin Butte Landfill has been subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart AAAA, Municipal Solid Waste Landfills. In addition, the landfill is also subject to Oregon's Landfill Gas Emissions requirements, Oregon Administrative Rule (OAR) Chapter 340, Division 239, which were adopted and became effective in October 2021. The state rules parallel the federal requirements in many respects and they also contain more stringent provisions.

DEQ has conducted its initial review of the information gathered by EPA, as well as other required reporting that VLI has submitted to DEQ. In addition, DEQ has reviewed the December 2021 Gas Collection and Control System Design Plan (Design Plan) for the landfill. This PEN documents the violations of state and federal landfill gas requirements that DEQ has identified, and requests additional information and corrective actions. As described below, this matter is

Pre-Enforcement Notice Valley Landfills, Inc. Page 2 of 12

also being referred to DEQ's Office of Compliance and Enforcement for formal enforcement and civil penalty assessment.

### Surface Emissions Monitoring & Required Corrective Action

According to 40 CFR 63.1958(d) and 40 CFR 63.1960(c), VLI must conduct surface emissions monitoring (SEM) using a portable monitor at no more than 30-meter intervals throughout the collection area of the landfill. SEM must also be conducted at all cover penetrations, and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The federal requirements state that, "[a] surface monitoring design plan must be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing."

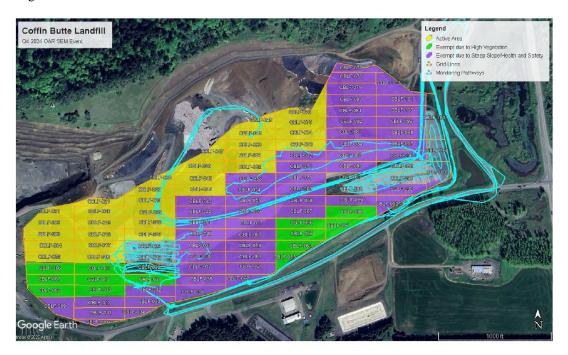
OAR 340-239-0800(1) requires VLI to conduct quarterly SEM using the procedures specified in OAR 340-239-0800(3). OAR 340-239-0800(3)(a) requires VLI to conduct SEM on the "entire landfill surface" with 25-foot spacing (approx. 7.6 meters). The landfill surface means "the area of the landfill under which decomposable solid waste has been placed, excluding the working face." OAR 340-239-0015(23). The working face means "the open area where solid waste is deposited daily and compacted by landfill equipment." OAR 340-239-0015(41). For purposes of evaluating compliance with the surface emission methane concentration limits in OAR 340-239-0200, the working face must be kept to the "minimum size and time duration as possible." OAR 340-239-0300. Any areas that VLI seeks to exclude from SEM, other than the working face, as defined in Division 239, must be approved by DEQ under OAR 340-239-0500.

Neither EPA nor DEQ have approved exemptions to the above SEM requirements.<sup>1</sup>

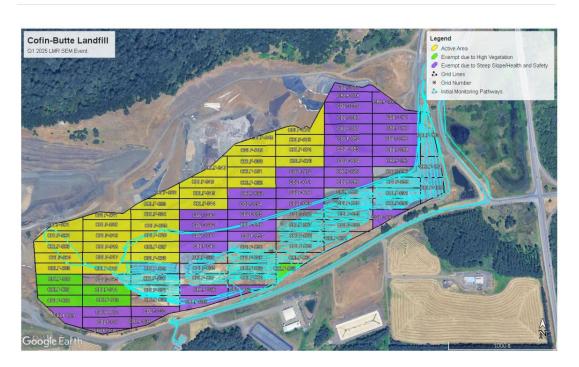
Since at least 2022, VLI has failed to conduct SEM as required by Subpart AAAA and Division 239 by consistently excluding large areas of the landfill where SEM is required, as illustrated by the two maps below from VLIs quarterly SEM reports submitted to DEQ.

<sup>&</sup>lt;sup>1</sup> In February 2020, VLI submitted a request for approval of alternatives to SEM, under federal rules that the landfill was previously subject to, 40 CFR Part 60, Subpart WWW. DEQ and EPA reviewed the proposal and responded in September 2020. Importantly, DEQ denied VLI's request to monitor at 60-meter intervals rather than 30-meter intervals. Additionally, DEQ and EPA found that VLI had provided insufficient information to consistently excluded areas of the landfill claimed as dangerous including roads, active fill area, truck traffic areas, construction areas, areas with snow or ice over, and slopes steeper than or equal to 5:1. DEQ approved the exemption subject to the following conditions: 1) that VLI must submit in its semi-annual reports to DEQ a "detailed explanation why those areas are excluded from surface monitoring, and duration of time the location is excluded from SEM"; 2) that VLI must submit a request in writing if it planned to exclude the same location more than two consecutive quarters, and 3) if the excluded areas are long-term rather than temporary, that VLI modify the design plan and get those changes approved by DEQ. DEQ has not approved any requests to exclude areas from SEM more than two consecutive quarters, nor has DEQ approved a modified design plan excluding areas from SEM over the long-term.





Fourth Quarter 2024
Initial Surface Emissions Monitoring Pathway
Coffin Butte Landfill, Corvallis, Oregon



First Quarter 2025
Initial Surface Emissions Monitoring Pathway
Coffin Butte Landfill, Corvallis, Oregon



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First, in both the fourth quarter of 2024 (Q4 2024) and the first quarter of 2025 (Q1 2025), VLI excluded a large area of the landfill to the north of the monitoring grid and provided no rationale for the exclusion. Second, VLI excluded areas (in green on the above maps) as "[e]xempt due to high vegetation." DEQ has not approved any such exemptions. To the contrary, DEQ's expectation is that landfills maintain vegetation such that SEM can be conducted each quarter. Third, VLI failed to monitor a large area (in yellow on the above maps) claiming it as an "[a]ctive area." Such a large area does not comport with the definition of "working face" in Division 239 and DEQ has not approved any other exemptions for active areas of the landfill. Finally, VLI claimed a large area (in purple on the above maps) as "[e]xempt due to steep slope/health and safety." While the safety of monitoring personnel is important, DEQ has not approved any exemptions from SEM on this basis. DEQ further notes that much of the area in the southern portion of the landfill that was claimed as exempt from SEM due to high vegetation or safety reasons in Q4 2024 was successfully monitored in Q1 2025.

In addition, during both EPA inspections – in June 2022 and June 2024 – EPA documented a significant number of exceedances of the 500 ppm standard as compared to VLI's own SEM. For example, on June 23, 2022, EPA monitored only a portion of the landfill and documented 61 exceedances, 21 of which were above 10,000 ppm methane. In contrast, VLI's own SEM of the entire landfill, conducted on June 9, 2022, detected only 6 exceedances of 500 ppm methane. On June 21, 2024, EPA monitored only a portion of the landfill surface and found 41 exceedances of 500 ppm or higher. In contrast, in its own SEM of the landfill on March 26 and 29, 2024, VLI identified only 11 exceedances.

Based on the above, in Corrective Action #1 below, DEQ is requesting that VLI submit a significant permit modification to allow for SEM with a drone. In December 2022, EPA approved Other Test Method 51 (OTM 51) as an alternative to the SEM requirements in 40 CFR Part 63, Subpart AAAA and other federal SEM requirements. More recently, DEQ has worked with the Lane County Regional Air Protection Agency to develop conditions that incorporate Oregon's Division 239 SEM requirements and allow for drone monitoring. DEQ is optimistic about the improved accuracy, efficiency, and safety benefits of drone monitoring. Based on VLI's significant noncompliance with SEM requirements and the need to safely conduct comprehensive SEM, DEQ is requesting that VLI submit a permit modification application to allow for drone monitoring.

SEM is required, according to the federal Subpart AAAA requirements, to ensure that the landfill's gas collection and control system (GCCS) is being operated so that the methane concentration is less than 500 ppm above background at the surface of the landfill. Under Oregon's Division 239 requirements, VLI must demonstrate consistent compliance with both a 500 ppm instantaneous methane concentration limit and a 25 ppm average methane concentration limit based on "integrated" SEM, which takes the average of SEM readings within a 50,000-square-foot grid. OAR 340-239-0200(1); OAR 340-239-0800(3).

Exceedances of 500 ppm (instantaneous) or 25 ppm (integrated) trigger remonitoring and corrective action requirements. 40 CFR 63.1960(c); OAR 340-239-0600(1). If those requirements are not followed, the landfill is in violation of the compliance standards. 40 CFR



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63.1958(d); 40 CFR 63.1960(c)(4); OAR 340-239-0200(1). Following an exceedance, VLI must take corrective actions such as cover maintenance or repair or well vacuum adjustments. These actions must be documented and reported to DEQ semi-annually, including the "action taken to repair the leak" and "date of repair." OAR 340-239-0700(3)(C)(A). Since 2022, VLI has failed to conduct remonitoring on all required occasions. For example, in both the Q3 2022 and Q4 2022 SEM reports, VLI stated that remonitoring was not conducted "due to weather." Where remonitoring has been conducted and a lower methane concentration achieved, VLI has not provided the required detail in its semi-annual reports to DEQ regarding the specific corrective actions taken and the dates those actions were completed. Importantly, if remonitoring shows a third exceedance of either the 500 ppm or 25 ppm standard, VLI must install a new or replacement collection device and must demonstrate compliance no later than 120 days after detecting the third exceedance. 40 CFR 63.1960(c)(4)(v); OAR 340-239-0600(1)(a)(C)(ii) and (1)(b)(B)(ii). The installation date and location of each well installed as part of a gas collection system expansion must be reported semi-annually to DEQ. 40 CFR 63.1981(h)(6); OAR 340-239-0700(3)(c)(A).

The attached Tables show the instances where VLI's SEM reports show three exceedances of the 500 ppm (instantaneous) or 25 ppm (integrated) standard, requiring gas collection system expansion with a 120-day deadline. VLI has been reporting to DEQ semi-annually on system expansion and new wells installed and decommissioned. However, it is difficult to correlate the locations of the new wells installed with the locations where three exceedances of a standard (500 ppm or 25 ppm) triggered a required expansion. DEQ is requesting that VLI submit this information in response to Information Requests #2-4, below.

### Gas Collection and Control System

Subpart AAAA requires VLI's gas collection and control system (GCCS) to be designed to handle the maximum expected gas generation flow rate from the entire area of the landfill that warrants control over the intended use period of the GCCS. 40 CFR 63.1959(b)(2)(ii)(B)(i). The maximum expected gas generation flow rate is calculated according to the equations in 40 CFR 63.1960(a)(1). Oregon's Division 239 standard for GCCS design points to the same maximum expected gas generation flow rate calculation. OAR 340-239-0110(1)(c)(C). EPA's Landfill Gas Emissions Model (LandGEM) may be used to perform the calculations. However, LandGEM runs used to determine GCCS design must be consistent with rule requirements.

In December 2021, VLI submitted an amended Design Plan for the Coffin Butte landfill to DEQ (2021 Design Plan). The calculations in the 2021 Design Plan that VLI has used to determine the sizing of the installed GCCS at the Coffin Butte landfill are inconsistent with rule requirements. Specifically, the calculations in the 2021 Design Plan did not include waste placed in the landfill prior to 1998, did not use total waste (instead the calculations included separate runs for modified bulk waste construction and demolition waste), and did not use model parameters required by rule. In addition, the 2021 Design Plan assumes a 75% collection efficiency for GCCS design. The calculations in Subpart AAAA and Division 239 include no such assumption; rather, they require GCCS design for 100% of the maximum expected gas generation flow rate. As a result, the 2021 design and the subsequent installation and operation of the Coffin Butte



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landfill GCCS is undersized as compared with the maximum expected gas generation flow rate. Also, VLI modified the GCCS by installing and commencing operation of a new enclosed flare on August 6, 2024. However, VLI did not submit an amended Design Plan to reflect that change as required under OAR 340-239-0110(1)(b).

DEQ appreciates the updated LandGEM runs that VLI submitted on October 13, 2025. DEQ will continue to work with VLI to review updated calculations towards an approvable GCCS design and a GCCS expansion schedule.

DEQ also has concerns about VLI's operation and monitoring of the Coffin Butte landfill GCCS.

According to 40 CFR 63.1955(c), VLI must operate the GCCS consistent with good air pollution control practices such that all collected gases are vented to a control system. According to 40 CFR 63.1955(f) VLI must operate the control system at all times when the collected gas is routed to the system. According to OAR 340-239-0110(2)(a)(A), VLI must route all collected gas to a gas control device or devices and operate the GCCS continuously except during well raising or during temporary shutdown for repairs. OAR 340-239-0110(2)(a)(E) requires that in the event the GCCS is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within one hour of the GCCS not operating.

The GCCS for the Coffin Butte landfill consists of a collection system, a "treatment system" comprised of five engines that combust landfill gas to generate energy (operated by Pacific Northwest Generating Cooperative under a separate DEQ air quality permit), and two flares that also combust landfill gas. As discussed above, in August 2024, VLI replaced the two open flares (known as flare #1 and flare #2) with an enclosed flare that has a higher destruction efficiency, as required by Division 239.

VLI has failed to operate components of the GCCS consistent with the Subpart AAAA and Division 239 requirements described above. Specifically, VLI has reported extensive downtime events for its flares. For example, in the first half of 2022 there were eight events where flare #1 was down for more than 100 hours during each event, with one of the events extending over 428 hours. The collection system was only down for an hour and thirty minutes during that same sixmonth time period in 2022. During the first six months of 2025, the new enclosed flare was offline intermittently for a total time period that adds up to over 15 calendar days. The collection system was only down for approximately 17 hours during that same six-month time period in 2025.

According to 40 CFR 63.1961(a) and OAR 340-239-0110(3), VLI is required to conduct monthly monitoring at each wellhead for gauge pressure, temperature, nitrogen and oxygen. These parameters help indicate the performance of the well and may require corrective action.

In its semi-annual compliance report for the first half of 2025, VLI reported that it failed to monitor 8 wellheads; some of the wellheads were not monitored for multiple months during



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January-June 2025. In a letter dated Sept. 12, 2025, Valley Landfill submitted a permit deviation report that informed DEQ well 2V000114 was not monitored in August of 2025.

### **Landfill Cover Integrity**

The Coffin Butte landfill uses soil, which is at least 12 inches thick, as interim cover in areas where waste has been placed but is not at final grade. Some areas are also covered on an interim basis with plastic to reduce leachate generation. VLI has placed final cover in several cells (or portions of cells) in the southern portion of the landfill where waste is no longer being added. Maintaining the landfill cover helps minimize landfill gas leaks to the atmosphere.

According to the Division 239 rules, VLI was required to submit a Methane Generation Report to DEQ by October 1, 2022. According to OAR 340-239-0700(f)(D), the Methane Generation Report was required to include the results of a visual inspection of the landfill cover and any actions done to fix leaks and minimize releases. According to OAR 340-239-0100(5)(a)(C), VLI must maintain the landfill cover so as to minimize landfill gas emissions and visually inspect the landfill surface annually for signs of methane releases including distressed vegetation, cracks or seeps. According to 40 CFR 63.1960(c)(5) and OAR 340-239-0600(4), VLI must implement a program to monitor cover integrity and implement cover repairs as necessary on a monthly basis.

DEQ has reviewed VLI's reports regarding its monthly visual inspections of the landfill cover from January 2021 through the present. With the exception of a single report for September 2024, VLI has consistently reported conducting monthly inspections of the landfill cover, with "no issues" or "no holes" found during the inspections. In contrast, during EPA's June 2024 inspection of the landfill, EPA and DEQ inspectors observed many holes in the landfill cover and a significant number of trees growing through the plastic cover. The EPA inspector who prepared the inspection report stated: "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."

### **Fugitive Dust**

Over the last several years, DEQ has received many complaints from the public regarding fugitive dust from the Coffin Butte landfill. One of the primary concerns of complainants, which is supported by photographs, is that when tipping occurs, some waste loads generate a significant plume of dust. Condition 4 of VLI's Title V permit requires VLI to take reasonable precautions to prevent particulate matter, including dust, from becoming airborne, and lists a number of strategies that may be used. Condition 5 of the Title V permit requires weekly visual surveys for any sources of excess fugitive emissions using EPA Method 22. DEQ is requesting records of these Method 22 surveys in Information Request #6, and an evaluation and plan to control fugitive emissions generated by tipping dry loads in Corrective Action #5.

Based on the above, DEQ has concluded that Valley Landfill, Inc. is responsible for the following violations of Oregon environmental law:



### **VIOLATIONS:**

### Surface Emissions Monitoring & Required Corrective Action

- (1) Failure to conduct quarterly surface emissions monitoring as required by 40 CFR 63.1958(d), 40 CFR 63.1960(c), OAR 340-239-0600(1) and OAR 340-239-0800(3). This is a Class I violation according to OAR 340-012-0054(1)(tt).
- (2) Failure to conduct remonitoring and take required corrective actions when surface emission monitoring instantaneous or integrated grid sampling showed an exceedance, in violation of 40 CFR 63.1960(c) and OAR 340-239-0600(1). This is a Class I violation in accordance with OAR 340-012-0054(1)(uu).

### Gas Collection and Control System

- (3) Failure to install and operate a gas collection and control system designed to handle the maximum expected gas generation flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control system equipment, in violation of 40 CFR 63.1959(b)(2)(ii)(B)(i), 40 CFR 63.1960(a)(1) and 340-239-1001(1)(c)(C). This is a Class I violation in accordance with OAR 340-012-0054(1)(pp).
- (4) Failure to amend the landfill gas collection and control design plan after modifying the existing gas collection and control system, in violation of OAR 340-239-0110(1)(b). This is a Class I violation according to OAR 340-012-0054(1)(oo).
- (5) Failure to operate the control system at all times when the collected gas is routed to the system, in violation of 40 CFR 63.1955(f), 40 CFR 63.1955(c), and OAR 340-239-0110(2)(a)(A). This is a Class I violation according to OAR 340-012-0054(1)(qq).
- (6) Failure to conduct monthly monitoring at each wellhead for gauge pressure, temperature, nitrogen and oxygen, in violation of 40 CFR 63.1961(a) and OAR 340-239-0110(3). This is a Class I violation according to OAR 340-012-0054(1)(rr).

### **Landfill Cover Integrity**

(7) Failure to maintain the landfill cover so as to minimize landfill gas emissions and to implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis, in violation of 40 CFR 63.1960(c)(5), OAR 340-239-0600(4), OAR 340-239-0100(5)(a)(C). This is a Class I violation according to OAR 340-012-0053(1)(b).

Class I violations are the most serious violations; Class III violations are the least serious.



### **Information Request**

According to Condition G.23 of your Title V Permit and OAR 340-214-0110, please submit the following information via email to Mike Eisele at DEQ (<u>michael.eisele@deq.oregon.gov</u>) by November 26, 2025:

- 1) For Jan. 1, 2022, to the present, submit records of all corrective actions taken in response to exceedances of the standards in OAR 340-239-0200(1), including the action taken to repair the leak and the date of the repair, as required by OAR 340-239-0700(2)(a)(c).
- 2) For each location in the attached Table 1 and Table 2, please provide the installation date for each new well installed, the name or label for the new well, or a statement that no well has been installed in that location.
- 3) Submit a map that shows all of the new wells installed since Jan. 1, 2022. The map should include labels or a key that corresponds to the information requested in item 1, above.
- 4) Submit a map that shows all of the wells decommissioned since Jan. 1, 2022.
- 5) Submit a copy of all work orders or invoices for cover repairs completed from Jan. 1, 2022, to the present.
- 6) Submit a copy of all Method 22 records according to Conditions 5 and 26 of the Title V permit form Jan. 1, 2022, to the present.

### **Corrective Actions Requested:**

- 1) By Jan. 1, 2026, submit a significant permit modification via YourDEQOnline (YDO) to use drone technology, as approved by EPA in OTM-51, to complete surface emissions monitoring required under 40 CFR Part 63, Subpart AAAA and OAR Chapter 340, Division 239.
- 2) By Jan. 1, 2026, submit an operation and maintenance plan for the flare to ensure compliance with 40 CFR 63.1955(f), 40 CFR 63.1955(c), and OAR 340-239-0110(2)(a)(A).
- 3) By Feb. 1, 2026, submit an amended design plan to DEQ for approval that meets the requirements of 40 CFR Part 63, Subpart AAAA and OAR Chapter 340, Division 239. Specifically, the amended design plan must include a GCCS design to handle the maximum expected gas generation flow rate calculated according to 40 CFR 63.1960(a)(1). With the amended design plan submittal, submit a proposed schedule for installing and operating an expanded collection and control system.
- 4) By Feb. 1, 2026, have a third party with expertise in landfill design and maintenance conduct a full inspection of the Coffin Butte landfill cover integrity, including areas under



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both interim and final cover, and submit a report of the inspection findings to DEQ. The report must include: 1) a review of the cover type and cover integrity for each grid of the landfill, 2) documentation, including photographs for each grid showing any cracks, holes or other penetrations in need of repair, 3) a list of needed repairs to restore cover integrity, and 4) recommendations for ongoing cover monitoring and maintenance. Submit the report for DEQ approval along with a proposed timeline for implementing cover repairs.

5) By Feb. 1, 2026, have a third party with expertise in landfill operations and dust control conduct a study of fugitive dust control management and options for the Coffin Butte landfill. The study must include: 1) a review of the types of loads received at the Coffin Butte landfill that generate significant dust plumes when tipped, 2) a review of VLI's current practices for managing fugitive dust from tipping operations, 3) a review of industry best practices for managing fugitive dust from tipping operations, and 4) recommendations for fugitive dust management at the Coffin Butte landfill. Submit the study, along with a Fugitive Dust Control Plan for the Coffin Butte landfill to DEQ for approval.

As described above, VLI violated multiple important state and federal requirements aimed at controlling landfill gas emissions. One of the major constituents of landfill gas is methane—a potent greenhouse gas that contributes to climate change. Landfill gas also includes nonmethane organic compounds, some of which are known or suspected carcinogens and may cause other serious health effects. Landfill gas emissions also affect human welfare due to odor. Therefore, failure to control landfill gas emissions from the Coffin Butte landfill as required has significant environmental and public health impacts.

This Pre-Enforcement Notice is not a final agency action. The violations cited above are being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a DEQ order. A formal enforcement action may include a civil penalty assessment for each day of violation. Your timely and responsive action on these items will be taken into consideration in any civil penalty assessment issued by DEQ.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide written information to me. DEQ will consider new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. Should you have any questions about compliance or about the content of this letter, you may contact me at 503-378-5070 or <a href="michael.eisele@deq.oregon.gov">michael.eisele@deq.oregon.gov</a>.

Sincerely,

Mike Eisele

Michael Eisele, PE Environmental Engineer 3

cc: Zach Loboy, DEQ Erin Saylor, DEQ Becka Puskas, DEQ



Table 1. Locations with three exceedances of 500 ppm (instantaneous) requiring system expansion  $\,$ 

	Location with three exceedances			Deadline for system
Quarter	of 500 ppmv	Latitude	Longitude	expansion
Q2 2023	4V000055	44.70118172	-123.2275967	10/3/2023
Q2 2023	2H000086	44.69953174	-123.2315083	10/3/2023
Q2 2023	2H000087	44.69954171	-123.231515	10/3/2023
Q2 2023	3ARC0076	44.69906671	-123.232757	10/3/2023
Q4 2023	2V000089	44.70056003	-123.22847	4/13/2023
Q4 2023	4V000055	44.70118004	-123.2276	4/13/2023
Q1 2024	4V000055	44.70118004	-123.2276	7/24/2024
Q1 2024	2V000089	44.70056003	-123.22847	7/24/2024
Q1 2024	3A0V0078	44.69873998	-123.2332	7/24/2024
Q1 2024	3V000100	44.69902103	-123.232619	7/24/2024
Q1 2024	2H000086	44.69952998	-123.23151	7/24/2024
Q1 2024	2V00100S	44.69920753	-123.2314313	7/24/2024
Q1 2024	2H000101	44.69929654	-123.2308005	7/24/2024
Q1 2024	3ARC0074	44.69944272	-123.2320347	7/24/2024
Q2 2024	2V000121	44.700192	-123.230313	11/13/2024
Q2 2024	2H000121	44.699896	-123.230941	11/13/2024
Q2 2024	3A0V0078	44.69874	-123.2332	11/13/2024
Q2 2024	2V000111	44.70022	-123.228817	11/13/2024
Q2 2024	3V000104	44.699546	-123.231715	11/13/2024
Q2 2024	2H000122	44.69993	-123.230945	11/13/2024
Q2 2024	4V000055	44.70118	-123.2276	11/13/2024
Q2 2024	2V00100S	44.6992075	-123.2314313	11/13/2024
Q2 2024	2H000087	44.69954	-123.23152	11/13/2024
Q2 2024	2V000123	44.700041	-123.230776	11/13/2024
Q2 2024	2V000089	44.70056	-123.22847	11/13/2024
Q2 2024	3ARC0074	44.6994427	-123.2320347	11/13/2024
Q2 2024	2H000086	44.69953	-123.23151	11/13/2024
Q2 2024	2V000124	44.700378	-123.229938	11/13/2024
Q2 2024	3V000093	44.6983595	-123.234183	11/13/2024
EPA Q2 2024	A27	44.698351	-123.234173	11/13/2024
Q2 2025	Q2 SEM-23	44.7024	-123.2268	10/25/2025
Q2 2025	Q2 SEM-20	44.70026	-123.23	10/25/2025
Q2 2025	Q2 SEM-25	44.70205	-123.22805	10/25/2025
Q2 2025	Q2 SEM-27	44.70131	-123.22791	10/25/2025
Q2 2025	Q2 SEM-47	44.70144	-123.23013	10/25/2025



Q2 2025	Q2 SEM-16	44.70015	-123.23068	10/25/2025
Q2 2025	Q2 SEM-32	44.70109	-123.2284	10/25/2025
Q2 2025	Q2 SEM-13	44.70042	-123.23008	10/25/2025
Q2 2025	Q2 SEM-19	44.70002	-123.23082	10/25/2025
Q2 2025	Q2 SEM-121	44.70049	-123.23004	10/25/2025
Q2 2025	Q2 SEM-38	44.70122	-123.22891	10/25/2025

Table 2. Locations with three exceedances of 25 ppm (integrated) requiring system expansion  ${\bf r}$ 

	I	
	Location with	
	three	Doodling for
Quarter	exceedances of 25 ppm	Deadline for system expansion
Q1 2023	CBLF-048	7/28/2023
	+	
Q1 2023	CBLF-050	7/28/2023
Q1 2023	CBLF-051	7/28/2023
Q1 2023	CBLF-054	7/28/2023
Q1 2023	CBLF-071	7/28/2023
Q1 2023	CBLF-072	7/28/2023
Q1 2023	CBLF-073	7/28/2023
Q1 2023	CBLF-074	7/28/2023
Q1 2023	CBLF-075	7/28/2023
Q1 2023	CBLF-076	7/28/2023
Q1 2023	CBLF-084	7/28/2023
Q2 2023	CBLF-027	10/3/2023
Q2 2023	CBLF-040	10/3/2023
Q2 2023	CBLF-052	10/3/2023
Q2 2023	CBLF-053	10/3/2023
Q2 2023	CBLF-054	10/3/2023
Q2 2023	CBLF-070	10/3/2023
Q2 2023	CBLF-071	10/3/2023
Q2 2023	CBLF-072	10/3/2023
Q2 2023	CBLF-080	10/3/2023
Q2 2023	CBLF-083	10/3/2023
Q2 2023	CBLF-084	10/3/2023
Q3 2023	CBLF-043	1/27/2024
Q3 2023	CBLF-044	1/27/2024
Q3 2023	CBLF-071	1/27/2024
Q4 2023	CBLF-022	4/6/2024



# 5) Community concerns received from 7/1/25 – 11/6/25

Does not include public comments on LU 24-7 which are being tracked separately.

9/16/25

Safety

Trucks hauling rock out of the former quarry at Coffin Butte, as part of Republic Services' development of new landfill cell(s), have been dropping boulder-sized chunks of basalt into the traffic lanes on Hwy 99W.

Please request that Republic address this as an urgent public safety issue of immediate concern.

I am not interested in hearing explanations or excuses from Paul Koster. If one of these rocks goes through someone's windshield, or hits a motorcycle, there could be a fatality. I've previously had to help one elderly woman from Pedee who had one of these rocks lodge in her car's wheel well and shred a tire, which could have also caused a more serious accident.

Most often these rocks are coming off and landing in the lane where traffic from Coffin Butte Road merge into traffic, on southbound Hwy 99W. But they also sometimes fall out as trucks get up to speed in the main highway traffic lanes, including when regular traffic is bunched up behind the slower trucks.

I'm attaching a photo of a boulder that I removed from the highway today around 09:30. That's a standard 8 x 11 inch legal pad, as background. It was right in the middle of the merging lane. I didn't take a photo of it while it was on the road, because traffic was busy and figured it was better to remove the hazard as quickly as possible.

Republic needs to address this by inspecting trucks for hazardous rocks BEFORE they leave the landfill cell development area.

Again, I am not interested in their excuses, they need to address the hazard before they kill someone.

Please also log this as a complaint in the county's files on Republic Services' operations. Also please share with DSAC, and with the public record for LU-24-027

------FOLLOW UP-----

Thanks for pursuing this. There was a new rock in the merging lane this morning (softball size instead of football size). Also basalt, like yesterday's rock.

These are irregular, angular chunks of rock, not rounded like river rock. Also these are ending up in the lane used by trucks leaving the landfill site, not the lanes used by trucks entering the landfill site.

There are also similar sized basalt rocks scattered along the shoulder of Coffin Butte Road, starting from where trucks come out of the former quarry (now Cell 6 area), where Soap Creek Road merges into Coffin Butte just west of Republic's landfill office, and all the way to Hwy 99W.

I travel the upper part of Soap Creek Road daily. I'm not seeing these rocks anywhere south of Republic's operation. So Mr. Koster's suggestion that these rocks are coming from some other source doesn't hold water. When trucks lose rocks this size off the back, this mostly happens close to where they're loaded. Also pretty sure I've encountered loaded trucks coming out of the quarry, merging onto the public portion of Soap Creek x Coffin Butte Road.

Yes there have been a lot of 10-wheelers hauling fill dirt and rock up Hwy 99W to the landfill from the recent road construction near Good Samaritan. This also appears to be part of Republic's operation. I was behind one of those trucks last week and followed to see where it went. It turned left onto Coffin Butte Road and went straight into the quarry/Cell 6 development area. Republic has been using that dirt with rocks mixed in for cover which is plainly visible from Soap Creek Road, and looks identical in color to what's being hauled out from the Good Sam site.

Logging trucks don't haul rocks, they haul logs.

Again, rather than try to make excuses, Republic should get to work on addressing the problem before it causes further vehicle damage, serious injury, or worse."

RESPONSE: Forwarded substance of complaint to Republic Services. Forwarded internally to PW. Benton County contacted ODOT and they responded that they don't have resources to address.

### **REPLY FROM REPUBLIC SERVICES:**

I can state without hesitation we are not hauling any rocks off site. All rock removed from the quarry remains within the landfill proper either for new road access, stockpile 1 by the scales (clearly visible from the road), or stockpile 2 within the quarry itself. If this person reporting can provide truck information to show that it is coming from our site, I would be more than willing to track the source.

We are only receiving rock from Knife River from off-site but that material is 1" or less round river rock and not this boulder sized material.

I also cannot speak to any normal traffic and vehicles travelling on Coffin Butte road and Soap Creek. However, I can note I do see a lot of logging and hauling trucks coming from Soap Creek so perhaps there is a different source of this material and not the landfill. I also do see many 10-wheelers with dirt and rock travelling up and down 99 as I leave for the day as well as when I drive to Corvallis on occasion.

\_\_\_\_\_\_

9/22/25

Litter

The Independence Hwy. has a lot of roadside litter north of the landfill, all the way to Hwy. 20. RESPONSE: Notified Republic Services so that they can send a crew.

11/5/25

Service

Bailey received a call regarding the recyclability of glass. The caller stated that he has been putting the glass in the commingled recycling. I explained why he shouldn't do that. He said that he called Republic Services twice and got different answers. The first time he said that they told him that glass isn't recycled in rural areas, which is incorrect. He said that he called again and was told to put it in the "green bin", which isn't a bin provided by RS in BC. I reached out to Republic Services to address a confusing link that could lead people to think that glass is included in the commingled.

https://www.republicservices.com/sites/default/files/legacy\_documents/Muni/Oregon/Corvallis/Oregon-Recycling-List-2025.pdf I emailed Republic Services about this service issue and will respond to the caller when I hear back from RS.

## Important Information and News Articles of Interest

The 2024 Coffin Butte Environmental Report is available on the DSAC website. It's broken up into <a href="Part A">Part A</a> and <a href="Part B">Part B</a>.

10/7/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 74e36b3b-c05b-52b1-83dc-ab93a9236a83.html

**Coffin Butte - Expansion** 

We have 15 years to find alternative

10/7/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 74e36b3b-c05b-52b1-83dc-ab93a9236a83.html

**Coffin Butte - Expansion** 

Making landfill larger ups the poisoning

10/7/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 74e36b3b-c05b-52b1-83dc-ab93a9236a83.html

Coffin Butte - Expansion

Lincoln County recycler touts Coffin Butte

10/9/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 3f3f51de-827b-5b14-a23e-8bc4641e30f6.html

Coffin Butte - Expansion

See how they're running this PR campaign

10/10/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 3f3f51de-827b-5b14-a23e-8bc4641e30f6.html

Coffin Butte - Expansion

Republic will lobby for rate increases

10/11/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page\_d28a38d2-4655-59ee-8350-f5a8a7218c97.html

**Coffin Butte - Expansion** 

Denying expansion is fiscally responsible

10/14/2025

**Gazette Times** 

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Coffin Butte - Expansion

Coffin Butte is essential to the community

10/16/2025

**Gazette Times** 

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Coffin Butte - Expansion

Coffin Butte is an eyesore and liability

10/16/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 3758ea10-48c4-5d00-9029-96afdea519d6.html

Coffin Butte - Expansion

Seek better answers than expansion

10/16/2025

Statesman Journal

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landfill-expansion-should-be-approved/86550422007/?utm\_source=psal-

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briefing&utm term=hero&utm content=1074SJ-E-NLETTER65

Coffin Butte - Expansion

County staff say Coffin Butte Landfill expansion should be approved

10/18/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 29820e1b-0768-5e11-bb97-1bf6917406bd.html

Coffin Butte - Expansion

Republic is following Fox News playbook

10/21/2025

**Gazette Times** 

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Coffin Butte - Expansion

**Grange opposes Coffin Butte expansion** 

10/22/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page 092bbe23-cc3e-572f-a719-d32a116a25d0.html

Coffin Butte - Expansion

**Landfill Expansion Appeal Starts** 

10/21/2025

**Gazette Times** 

https://corvallisadvocate.com/county-planners-favor-landfill-expansion-hearings-start-wednesday/

**Coffin Butte - Expansion** 

County Planners Favor Landfill Expansion, Hearings Start Wednesday

10/23/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page a4d760db-1e63-5b07-9486-4ad62f48100a.html

Coffin Butte - Expansion

Landfill expansion is fair and sustainable

10/23/2025

**Gazette Times** 

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butte-landfill-hearing/86819004007/?utm\_source=psal-

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briefing&utm term=hero&utm content=1074SJ-E-NLETTER65

Coffin Butte - Expansion

Proponents argue for expansion at Coffin Butte Landfill hearing

10/23/2025

KEZI

https://www.kezi.com/news/local/coffin-butte-landfill-expansion-appeal-heads-to-benton-county-commissioners/article be3d83a7-a569-410b-8072-2d02ca94ce4c.html

Coffin Butte - Expansion

Coffin Butte Landfill expansion appeal heads to Benton County Commissioners

10/23/2025

Trash Town USA

https://youtu.be/3al6tsMi4tQ

Coffin Butte - Expansion

15 Minute Video about the Coffin Butte Landfill

10/23/2025

**KKCO** 

https://www.kkco11news.com/2025/10/21/mesa-county-landfill-implements-new-gas-monitoring-technology/?utm source=Sailthru&utm medium=email&utm campaign=Issue:%202025-10-22%20Waste%20Dive%20Newsletter%20%5Bissue:78045%5D&utm term=Waste%20Dive

Technology

Mesa County landfill implements new gas monitoring technology - Meerkat monitoring system, designed by Grand Valley Instrumentation

10/24/2025

KEZI

https://www.youtube.com/watch?v=nI1-R6CX4Xc

Coffin Butte - Expansion

Coffin Butte Landfill Expansion Appeal Heads to Benton County Commissioners

10/25/2025

**Gazette Times** 

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Coffin Butte - Expansion

Expansion hearing draws hours of testimony

10/23/2025

Corvallis Advocate

https://corvallisadvocate.com/stinging-testimony-against-landfill-expansion-from-corvallis-state-senator-and-house-rep/

**Coffin Butte - Expansion** 

Stinging Testimony Against Landfill Expansion from Corvallis' State Senator and House Rep

10/24/2025

**Philomath News** 

https://philomathnews.com/benton-county-extends-record-period-for-landfill-expansion-appeal/

Coffin Butte - Expansion

Benton County extends record period for landfill expansion appeal

10/24/2025

Statesman Journal

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Coffin Butte - Expansion

Opponents blast Coffin Butte Landfill expansion proposal at county hearing

11/1/2025

**Gazette Times** 

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Coffin Butte - Expansion

As I See It: Facts argue for closing Coffin Butte

10/31/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page\_c6a719fa-2341-5408-95ac-30d3de11c660.html

Coffin Butte - Expansion

Letter: Stick to plan to close landfill by 2040

11/1/2025

**Gazette Times** 

https://gazettetimes.com/eedition/page\_c6a719fa-2341-5408-95ac-30d3de11c660.html

Coffin Butte - Expansion

Community's testimony powerful, compelling

11/4/2025

KLCC

https://www.klcc.org/politics-government/2025-11-03/benton-county-commissioners-to-vote-on-coffin-butte-landfill-expansion?utm source=Sailthru&utm medium=email&utm campaign=Issue:%202025-11-04%20Waste%20Dive%20Newsletter%20%5Bissue:78479%5D&utm term=Waste%20Dive

Coffin Butte - Expansion

Benton County Commissioners to vote on Coffin Butte landfill expansion

### 11/5/2025

Statesman Journal

https://www.statesmanjournal.com/story/news/2025/11/04/coffin-butte-landfill-can-expand-benton-county-commission-decides/87011476007/?utm\_source=psal-

<u>DailyBriefing&utm\_medium=email&utm\_campaign=daily-briefing&utm\_term=Content%20List%20-</u>%20Stacking%20-%20optimized&utm\_content=1074SJ-E-NLETTER65

Coffin Butte - Expansion

Coffin Butte Landfill can expand, Benton County Commission decides

### 11/5/2025

KLCC

https://www.klcc.org/environment/2025-11-04/benton-commissioners-approve-coffin-butte-expansion

Coffin Butte - Expansion

Benton County Commissioners approve Coffin Butte expansion

### 11/5/2025

**Gazette Times** 

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Coffin Butte - Expansion

Benton County approves Coffin Butte Landfill expansion

### 11/5/2025

DEQ

https://www.frontiersin.org/journals/sustainable-food-systems/articles/10.3389/fsufs.2025.1634747/full

PFAS

Reining in plasticulture from land to sea: Pacific Northwest (USA) perspectives on agriculture and aquaculture

### 11/6/2025

**Gazette Times** 

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**Coffin Butte - Expansion** 

**Coffin Butte Expansion Approved**