



Sustainability in Action

2024 Coffin Butte Annual Report

March 13, 2026

Executive Summary

REFRESHED APPROACH

Valley Landfills Inc., is please to present our 2024 Coffin Butte Landfill Annual Report. It has been redesigned for readability and simplicity but still covers all the relevant topics requested by Benton County Staff and Commissioners.

CALENDAR YEAR

Previous reports have melded different calendar years, depending on topic. This year's report reverts to the original intent – it covers only events occurring in calendar year 2024. However, some pages may include past summaries or forward-looking guidance as needed for clarity.

CONTENT AND TOPICS

This report contains operating, environmental compliance and sustainability updates and information for your review. At the county's request, it also includes breakouts on topics including PFAS in leachate, groundwater monitoring and odor complaints.

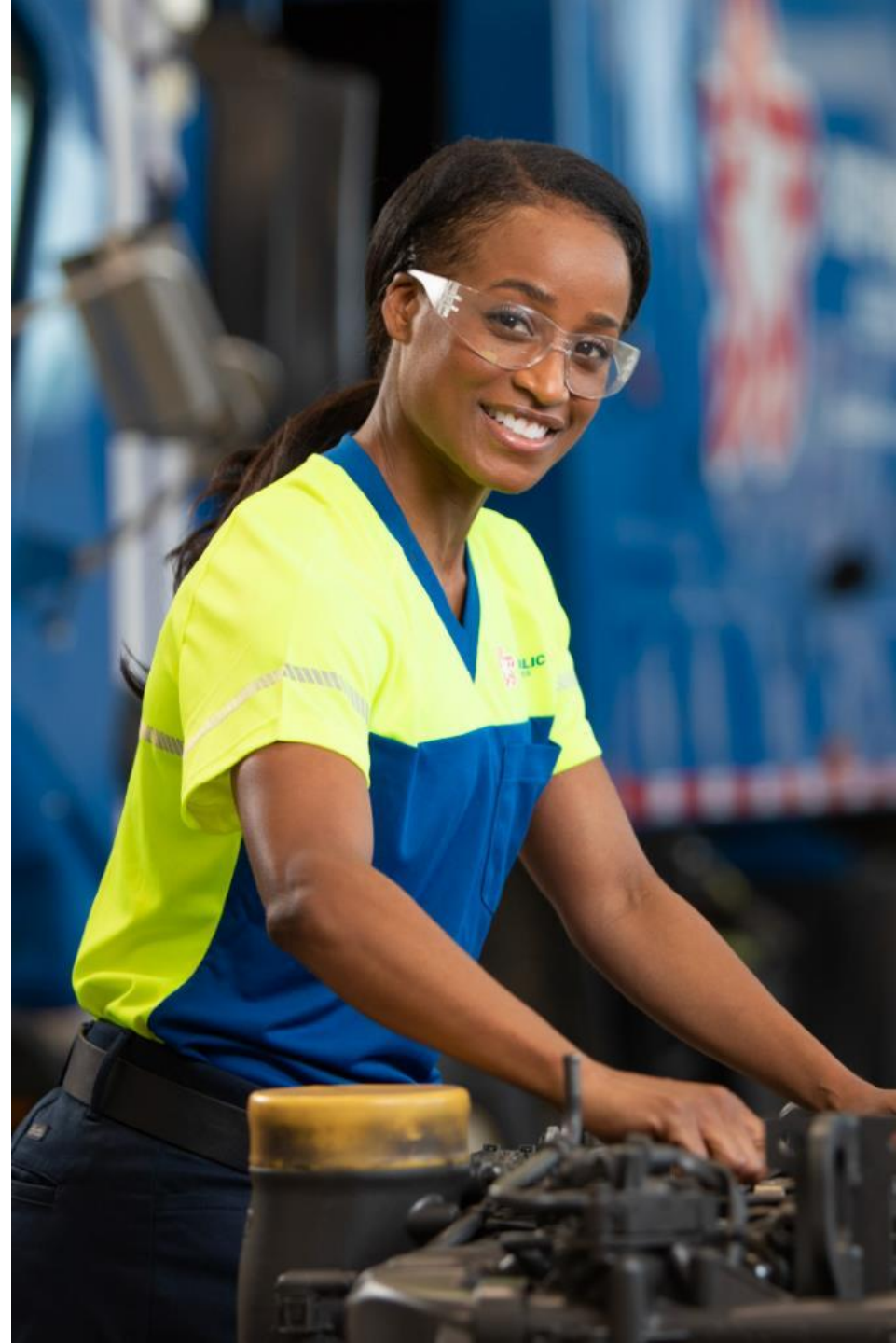


Table of Contents

- 01** Capacity and Infrastructure (Page 4)
- 02** Annual Environmental Monitoring Report (Page 10)
- 03** Pacific Region Compost (Page 15)
- 04** Federal & State Regulatory Updates (Page 17)
- 05** Landfill Operational Complaints (Page 21)
- 06** 2024 CUP Application (Page 23)
- 07** Environmental and Regulatory Permits (Page 25)
- 08** Site Map and Well Locations (Page 27)
- 09** Summary of Landfill Users (Page 29)
- 10** Certificate of Insurance (Page 31)



Sustainability in Action

Capacity and Infrastructure

01

We projected the Landfill had 12.9 years of life remaining at the end of 2024.

Coffin Butte Landfill has approximately 39,591,002 cubic yards (including what has already been consumed by waste disposal) of permitted airspace. During 2024, the landfill accepted 1,032,214 tons of solid waste. Based on historical aerial flyover data, the average effective density of the in-place waste at Coffin Butte Landfill is 0.98 tons/cy (1,965 lbs/cy – 2023 Operational Density).*

Therefore, an estimated 1,050,120 cubic yards of airspace was used for the year. Approximately 24,479,851 cubic yards has been consumed as of December 31, 2024, leaving a remaining capacity of 14,517,716 cubic yards of permitted air space.

In terms of remaining life at Coffin Butte, we projected the Landfill had 12.9 years of life remaining. About 95 percent of that is in the area known as the Quarry.

We are actively depositing waste in a cell on the north side of the Landfill known as 6A. We estimate that cell will be completely full by February 2026.

*Effective density incorporates the effects of daily and intermediate soil cover usage. It is calculated by measuring the amount of airspace occupied between successive aerial flyovers using photogrammetric maps and dividing that volume into the number of tons of waste received at the gate.



Forward looking statement: The Landfill had approximately 10 years of life remaining, as of December 2025, based on current tonnage volumes. We continue to analyze site operations to maximize the amount of available airspace.

We continually invest in Coffin Butte's infrastructure to ensure we are providing best-in-class service and environmental stewardship to the County.

The following pages summarize work completed through 2024.



Gas Collection System

Between 2019 and 2024, we invested \$9.4 million in the Landfill's gas control and collection system, installing 57 vertical wells and 22,700 feet of horizontal gas collection piping.

Since 1995, Coffin Butte has captured methane gas to generate electricity for 4,000 area homes, via a partnership with PNGC Power.

Forward looking statement: Further investments were completed in 2025, including upgrading 18 horizontal wells and installing 22 vertical wells, at an estimated cost of \$2.2 million.



Cell Construction

In 2024, we placed waste in what is known as Cell 5E. This was the last remaining cell in the main permitted area of the landfill. We also began constructing our first waste disposal cell in the Quarry, an area known as 6A.

Note: We began using this 10.4-acre cell for waste disposal in March 2025. It is expected to last about one year.

Forward looking statement: In 2025, we worked aggressively to construct Cell 6B Part 1 in the Quarry, at a cost of about \$16 million (liner system.) The cell is approximately 7.5 acres, and based on current annual tonnage, will be capable of accepting waste through late Q3 2026.



Leachate Management

Each year we utilize an extensive network of geosynthetic covers to better capture rain and reduce the impact it has on decomposing waste. These covers reduce the volume of leachate that is produced and then must be treated, which saves energy, reduces costs and is better for the environment.

In addition, the Landfill has a robust groundwater monitoring system comprised of 35 wells, which are regularly checked to ensure peak performance and compliance with our regulatory permits.

We continue to invest and apply geosynthetic covers to better divert stormwater, which reduces leachate production.

Republic Services is a leader in the responsible disposal of waste containing PFAS, which is ubiquitous in the products we use.

Coffin Butte Landfill works closely with federal and state regulators on PFAS management.



About PFAS

Coffin Butte does not generate PFAS. It is a passive receiver. Our focus is safely managing PFAS through proper landfill operations.

Little can be done to reduce PFAS in landfill leachate, but manufacturers can reduce future levels by limiting the chemical in their products.

Coffin Butte works closely with the Cities of Corvallis and Salem and their WWTPs, to treat leachate generated at the landfill.

The 43.2 million gallons of leachate generated by Coffin Butte in 2024 is a small percentage of the overall wastewater treated at our partners' facilities.

The Landfill complies with its permits and regulatory requirements.



Sustainability in Action

Annual Environmental Monitoring Report (AEMR)

ENVIRONMENTAL IMPACT & MONITORING

Valley Landfills, Inc., as owner and operator of Coffin Butte Landfill, is committed to being a good neighbor and steward of the environment.

We prioritize safe and responsible operations, sustainability and collaboration with regulators at the local, state and federal level.



Inspections

- In 2024 Coffin Butte Landfill was inspected 6 times.
- Agencies conducting inspections included the U.S. Environmental Protection Agency, DEQ's Division of Material Management, Metro Regional Government, and the cities of Corvallis and Salem.



Reporting

- We submitted annual, semi-annual, quarterly and monthly reports to federal, state and local regulators, in accordance with our operational and environmental permits. [The 2024 Annual Environmental Monitoring Report \(AEMR\) was submitted to ODEQ in March 2025 and is on file with Benton County.](#)



Compliance

- The Landfill was not issued any notices of violation by EPA or the Oregon Department of Environmental Quality in 2024. We continue to work closely with state and federal regulators.

Forward-looking statement: The EPA sent the Landfill a Section 114 information request on January 21, 2025, and Oregon DEQ sent Coffin Butte a pre-enforcement notice in November 2025. Coffin Butte is working in cooperation with ODEQ to provide the information and corrective actions requested in the PEN.

What follows is the Executive Summary from the 2024 Annual Environmental Monitoring Report.

During 2024, no significant changes in water quality were observed. Quantifiable volatile organic compound (VOC) concentrations were measured in wells along the West Side compliance boundary at wells MW-12S and MW-12D. The tetrachloroethene (PCE) measurement in the sample collected from MW-12S during the Fall monitoring event Exceeded the primary drinking water standard. However, the long-term trend for PCE concentrations continues downward.

VOCs were detected at trace concentrations in other West Side compliance wells, and several inorganic parameters were present above screening levels. As the Fall monitoring event was a 5- year event, VOCs were also analyzed in the sample from well MW-19, and the measured concentrations were similar to historical results.

In wells on the West Side downgradient of the former Closed Landfill (from which the source removal was completed in 2022), Cell 1, and Cell 1A, groundwater quality trends are stable but elevated concentrations of inorganic constituents and metals continue to be measured in samples from wells in this area of the site. West Side Remedial Action Concentration Limits (RACL) were exceeded for chloride, TDS, iron, and manganese in samples from several wells during both monitoring events, and the concentration of PCE measured in the samples from MW-12S exceeded the RACL during both events.

At the compliance boundary for Cells 4 and 5 on the East Side, the primary drinking water standard for arsenic was exceeded in samples from several monitoring wells, but the measured concentrations are similar to natural background conditions.

Sampling results at MW-26 and MW-27 were below statistically-calculated site-specific limits (SSLs) for most of the indicator parameters during the Spring monitoring event. Manganese was marginally above the limit at MW-27. As dissolved metals were inadvertently excluded from analysis by the laboratory, these will be resampled during the Spring 2026 monitoring event.

Other than resampling for dissolved metals during the next monitoring event, no action is required on the basis of these RACL and SSL exceedances. The volume of leachate generated by Cells 1 through 5 for the 2023-2024 water year ending on September 30, 2024, was estimated at approximately 40 million gallons. VLI continues to monitor the secondary leachate collection systems (SLCS) beneath Cells 2, 3, 4, and 5.

The following summarizes the Title V Air Quality monitoring activities at the landfill.

Title V Air Quality Monitoring Report

We discussed our gas collection system earlier in this report, but it's important to talk specifically about our compliance with our air monitoring (Title V) permit. In September 2024, Valley Landfills Inc. notified ODEQ that Coffin Butte Landfill exceeded its threshold for non-methane organic compound emissions (NMOCs), as stipulated in its Title V Air Quality Permit.

On the same day, we sent an explanatory letter to the County. The Landfill's existing permit allows for 49 tons of NMOC emissions during a rolling 12-month period; actual emissions between September 2023 and August 2024 were 51.33 tons.

Coffin Butte Landfill has been working with DEQ since 2013 to update its Air Quality Permit, commensurate with population growth and waste disposal needs in Western Oregon. Our existing Air Quality permit was approved in 2009 and expired in 2014; the Landfill has been operating under an extension since.

Forward looking statement: We continue to have cooperative dialogue with ODEQ and are close to finalizing the Plant Site Emission Limits.





Leachate Treatment Options

Coffin Butte Landfill will no longer send leachate to the City of Corvallis wastewater treatment plant after December 2025. Leachate that was previously going to Corvallis is now headed to a private third-party treatment plant.



PFAS in Leachate

As noted earlier in this report, Coffin Butte Landfill is a passive receiver of PFAS; not a producer. Republic Services is an industry leader in the responsible disposal of waste containing PFAS. We manage this waste and the Landfill’s leachate in accordance with all local, state and regulatory guidelines.



Title V Renewal Status

Coffin Butte Landfill continues to work with ODEQ on the requirements for its updated Title V Permit. Valley Landfills recently received a draft Title V permit for review from DEQ and are working closely with DEQ to finalize sometime in 2026.



ODEQ Pre-Enforcement Notice

Valley Landfills Inc., has been working cooperatively with the ODEQ on its findings, providing both requested information and evidence of corrective actions already taken. The PEN does not represent the agency’s final determination and is still being adjudicated. VLI has provided all documentation to DEQ regarding the PEN and will continue to submit documentation as it is appropriate.



Sustainability in Action

Pacific Region Compost facility

PACIFIC REGION COMPOST FACILITY

The Pacific Region Compost Facility helps keep yard and food waste out of the landfill by turning it into nutrient rich compost and closing the organic loop. Compost nourishes soil, promoting healthy plants and reducing fertilizer reliance.



PRC collects nearly 140,000 yards of organic material annually, including food scraps, commercial food waste, yard debris and wood waste.



Both an aerated static system and windrow methods are employed at the site.



120,000 yards of compost are made from materials collected.



Compost goes to area agriculture, local bagging facilities and residential uses.



Over 100 yards of compost are donated annually to local community gardens.



Compost from PRC is OMRI Certified for use on organic crops.





Sustainability in Action

Federal Regulatory Updates

The following section of the annual report provides a summary of federal regulatory inspections and informational requests.

Occupational Safety and Health Administration

OSHA inspectors visited Coffin Butte Landfill in October 2023 and again in February 2024. These inspections resulted in three citations and fines totaling \$580.

All concerns were immediately addressed, including OSHA's request that we provide additional respiratory training for our employees. We now provide training once a year/other updates to the team as the need and situation dictates.

Coffin Butte Landfill places the highest priority on worker safety, and we are committed to providing a safe working environment for our employees.

EPA Surface Emissions Monitoring

The U.S. EPA conducted surface emissions monitoring at Coffin Butte Landfill in June 2022 and June 2024.

This report, because it covers Landfill activities in calendar year 2024, focuses primarily on events occurring during that 12-month period. However, a detailed timeline of events dating back to 2022 is included on the following pages. The timeline, which extends into 2025, is provided for clarity. A previous version of the timeline was also included in the 2023 Annual Report.

In June 2024, Coffin Butte Landfill was the subject of a no-notice inspection by the EPA. Inspectors identified 41 surface emissions exceedances. The Landfill immediately took corrective actions, including patching tears in the cover tarps and expanding the Landfill's gas collection and control system.

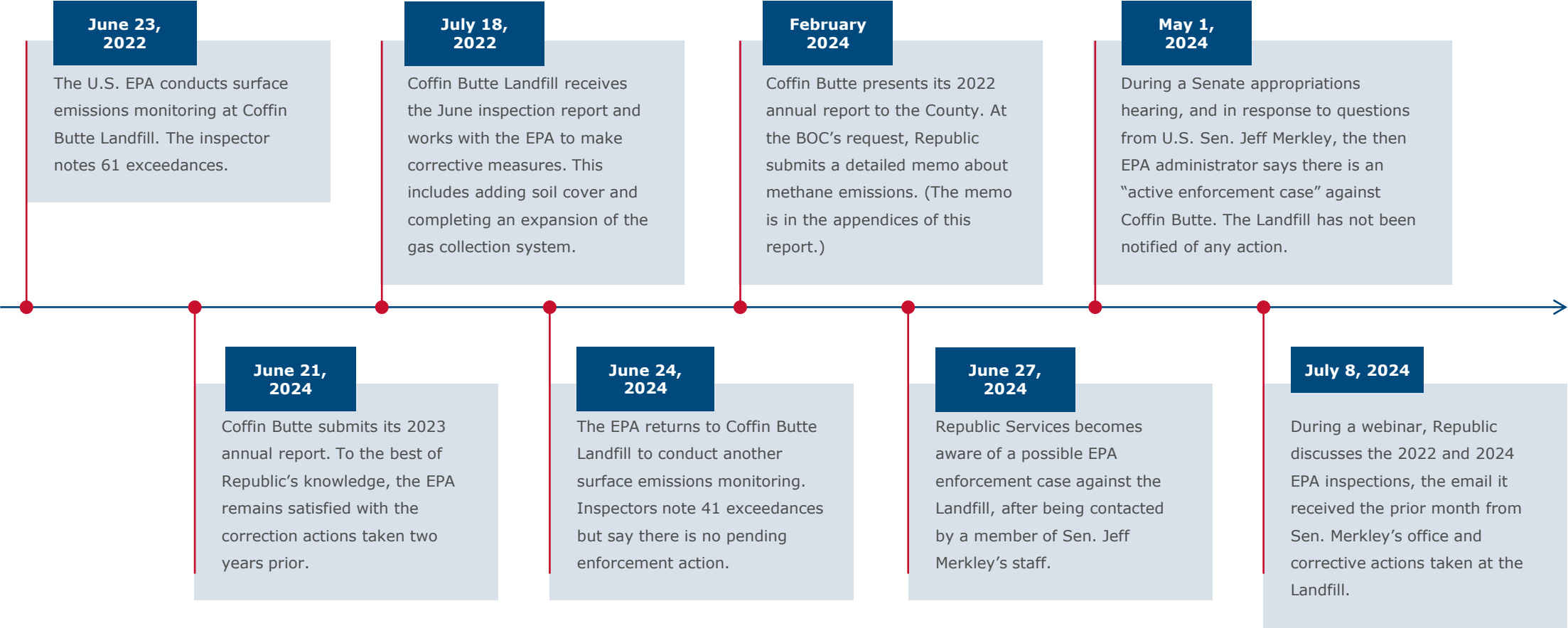
At the time of the June 2024 inspection, the Landfill was told it was not the subject of any enforcement action. However, in November 2025, Coffin Butte

Landfill received a Pre-Enforcement Notice from ODEQ. The Landfill is complying with the notice and has provided the agency with the requested information.

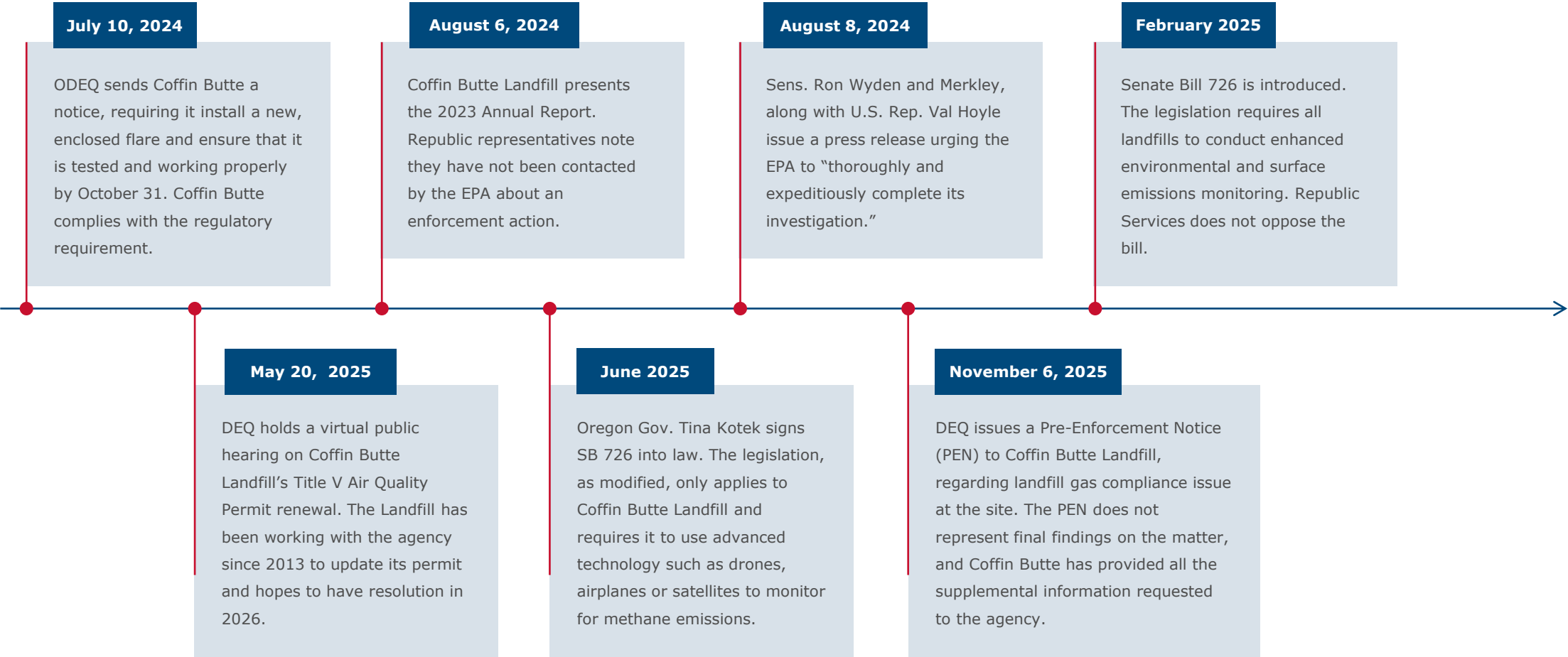
Enclosed Flare

Coffin Butte Landfill utilizes a flare to burn off excess gas as part of its gas collection system. On July 10, 2024, DEQ sent a pre-enforcement warning letter to the Landfill stating that it needed to replace the existing flare system with a new, enclosed flare to meet regulatory requirements. Coffin Butte Landfill completed the work on the new flare in October 2024.

EPA and DEQ Inspections and Action



EPA and DEQ Inspections and Action





Sustainability in Action

Landfill Operational Complaints

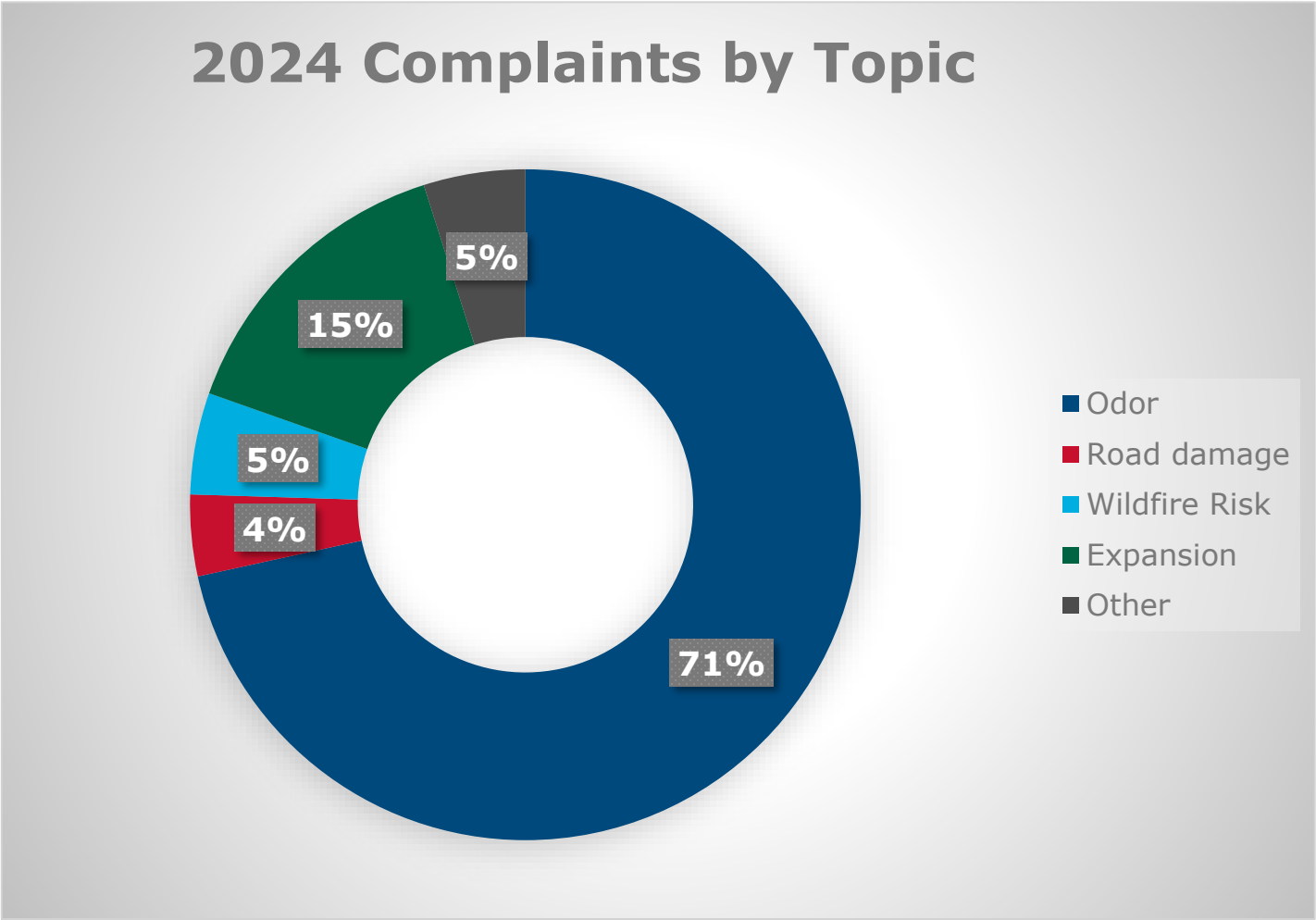
OPERATIONAL COMPLAINTS

The chart at right includes complaints received by the Landfill as well as those sent to Benton County and the Oregon Department of Environmental Quality.

While there is likely some overlap in the complaints between the county and the state’s data, we’ve included all on here out of an abundance of caution.

The “expansion” category includes those complaints received by the county that address topics such as litter and out-of-county waste.

The “other” category includes topics not directly related to landfill operations, including public notice and complaints about the county’s meeting structure, worker safety or matters already adjudicated (whether the landfill is permitted to dispose of waste in the Quarry.)





Sustainability in Action

2024 CUP Application

CUP Application Summary

Valley Landfills, Inc. applied to expand Coffin Butte Landfill on July 18, 2024, after holding a series of community meetings and webinars to explain its proposal.

Benton County deemed the application incomplete a month later and requested additional studies and reports.

Company representatives met repeatedly with the county and its third-party consultants in Fall 2024 to provide more detailed information about potential impacts.

The county deemed the application complete in February 2025, and scheduled Planning Commission hearings in May 2025.





Sustainability in Action

Environmental and Regulatory Permits

Permit Number	Permit Type	Permit Terms	Renewal Date	Enforcement Actions - 2020	Comments
SWDP # 306	Solid Waste	10 Year	June 30, 2030	None	
# 1200Z	NPDES Stormwater	5 Year	June 30, 2026	None	
#101545	NPDES Leachate Treatment	5 Year	September 30, 2017	None	Renewal Application Submitted-Administratively Extended
#02-9502	Title V Air Quality	5 Year	October 1, 2014	None	Renewal Application Submitted-Administratively Extended
#5	Industrial Wastewater Discharge	2 Year	May 31, 2025	None	City of Corvallis Leachate Disposal
#8679	Wastewater Discharge Permit	5 Year	December 31, 2027	None	City of Salem Leachate Disposal



Sustainability in Action

Site Map and Well Locations



LEGEND

- 300 EXISTING 10' CONTOUR¹
- EXISTING LINER LIMITS
- EXISTING PAVED ROAD
- EXISTING WATER
- EXISTING DRAINAGE
- EXISTING BUILDING
- EXISTING ZONING BOUNDARY
- EXISTING LANDFILL FOOTPRINT
- PROPERTY LINE
- EXISTING CLOSURE LIMIT
- ASBESTOS LIMITS
- APPROXIMATE LIMITS OF CELL 6
- MW-22 ● PIEZOMETER OBSERVATION WELL
- PW-2 ● WATER SUPPLY WELL
- QP-3S ● OBSERVATION WELL
- WELL ● PRIVATE WELL
- S-1 ▲ SURFACE WATER SAMPLING LOCATION
- S-U3 ▲ UNDERDRAIN SAMPLING LOCATION
- L-3 ▲ LEACHATE SUMP
- MW-16 ● DECOMMISSIONED WELL
- P-2 ● DECOMMISSIONED OBSERVATION POINT
- GP-4 ⊕ GAS PROBE
- BH-16 ○ TEMPORARY OBSERVATION POINT
- LDS-3 ◆ SECONDARY LEACHATE CONTROL SYSTEM (FORMALLY LEAK DETECTION SYSTEM)

NOTES

1. EXISTING TOPOGRAPHY BASED ON AERIAL SURVEY PERFORMED BY FIRMATEX LLC ON DECEMBER 08, 2024 COMBINED WITH OCTOBER 21, 2024 TOPOGRAPHY.

DRAFT

FIGURE NO.
2-1

COFFIN BUTTE LANDFILL MONITORING DATA REPORT - MONITORING LOCATION LOGGING Sheet 17 of 25 - 3.47 MB BY GEA USER

This drawing has not been published but rather has been prepared by Geo-Logic Associates, Inc. for use by the client named in the title block, solely in respect of the construction operation, and maintenance of the facility named in the title block. Geo-Logic Associates, Inc. shall not be liable for the use of this drawing on any other facility or for any other purpose.

REV. NO.	DATE	DESCRIPTION	APPROVED BY	DATE OF ISSUE
0	03/12/2025	2024 AEMR		03/12/2025
				DESIGNED BY: RPS/ASO



VALLEY LANDFILLS, INC.

COFFIN BUTTE LANDFILL
2024 ENVIRONMENTAL MONITORING
REPORT



Sustainability in Action

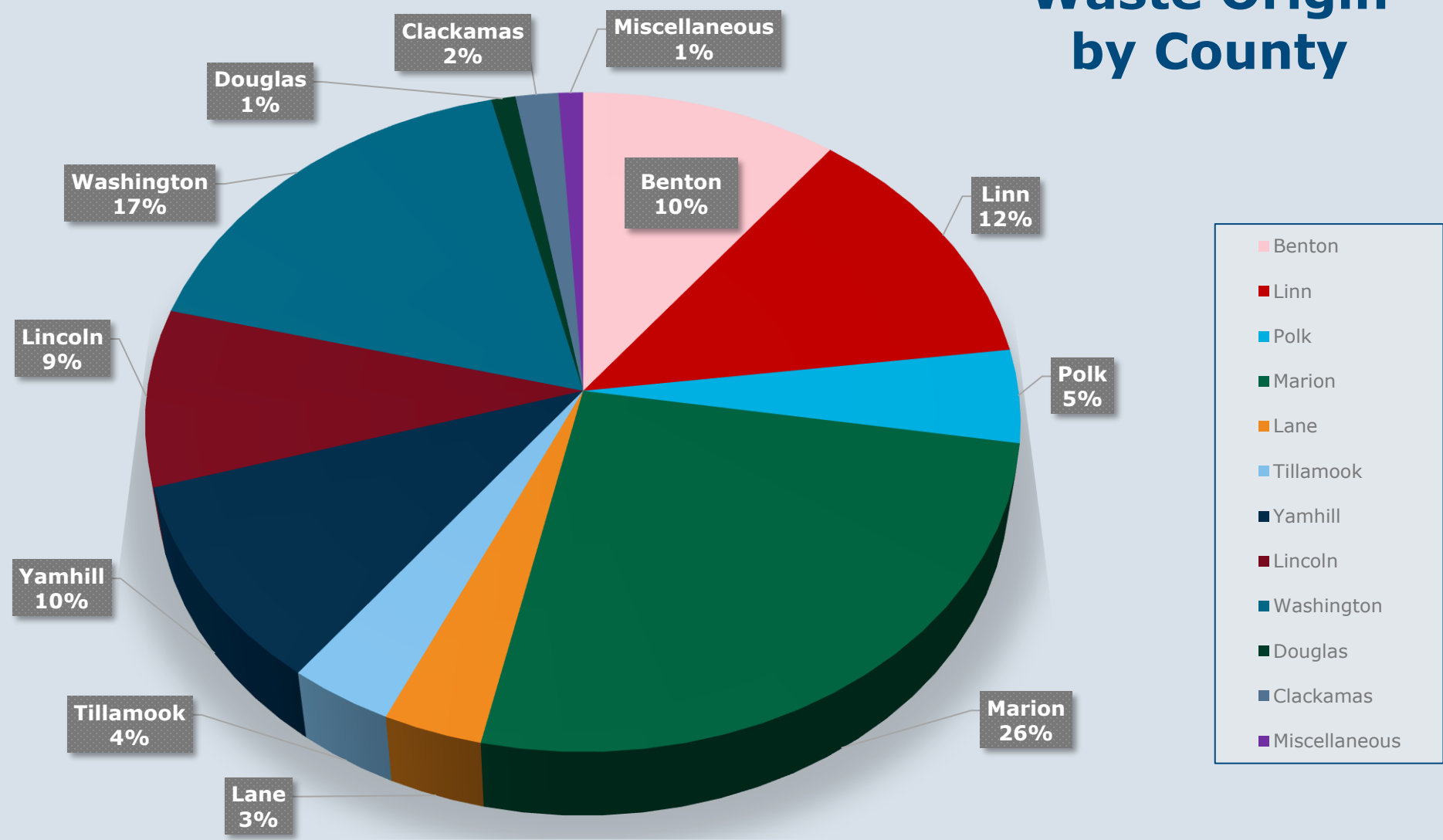
Summary of Landfill Users



In 2024, Coffin Butte Landfill accepted 1,032,214 tons of waste from approximately 15 counties.

Benton County residents and businesses disposed of 119,160.80 tons of waste at the Landfill during the year. These disposal costs were subsidized by the Landfill's other users.

The miscellaneous category includes all counties whose tonnage equates to <1 percent of total. These included Baker, Lake, Columbia, Clatsop, Coos and Cowlitz, WA.





Sustainability in Action

Certificate of Insurance



28972 Coffin Butte Rd. Corvallis, OR 97330
o 541.745.5792 f 541.230.5534 republicservices.com

March 19, 2024

Oregon Department of Environmental Quality
Manager, Western Region Materials Management
165 East 7th Avenue, Suite 100
Eugene, OR 97401-3049

RE: 2023 Annual Recertification of Financial Assurance, Coffin Butte Landfill, Benton
County, Oregon, Solid Waste Permit No. 306

Dear Becky Williams:

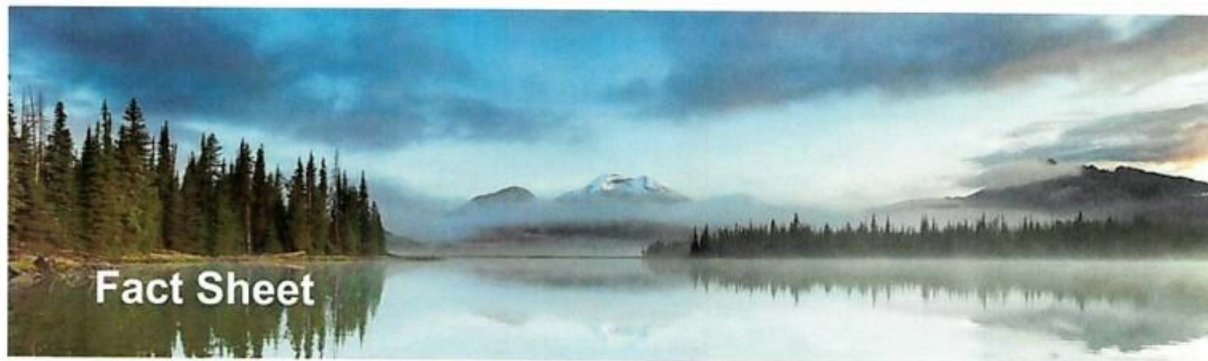
Enclosed are the updated closure and post-closure cost estimates for the Coffin Butte Landfill. Geo-Logic Associates updated the cost estimates and utilized the current DEQ rate of 5.08% for solid waste disposal sites to incorporate future inflation and discounting in the post-closure estimate. The estimates are provided under Attachments A and B.

Updated bonds of \$19,213,211 to cover the cost to close the landfill and of \$6,115,314 to provide post-closure maintenance for 30 years are provided under Attachment C. The "Annual Recertification of Financial Assurance" is provided under Attachment D in the enclosed Financial Assurance Plan.

Valley Landfills, Inc. respectfully requests that Oregon DEQ provide a written response documenting the receipt and acceptance of the updated closure/post-closure cost estimates. Please contact me at (541) 286-8515 if you have any questions or need any additional information.

Sincerely,

Bret Davis
General Manager
Valley Landfills, Inc.



Fact Sheet

Rates for Calculating Financial Assurance Updates

Municipal solid waste disposal site reference rate

This information is intended to assist in calculating costs associated with closure and post-closure activities for those solid waste disposal sites that are required to submit annual financial assurance updates.

This rate combines inflation and discount rates (specified by rule) into a single inflation-adjusted rate for discounting.

For July 1, 2023 through June 30, 2024 the MSW Reference Rate is -0.20%

Non-municipal solid waste disposal site inflation and discount rates

Inflation Rate: DEQ provides inflation-rate guidance each February based on a three-year moving average. The rate for calendar year 2024 is 5.08%. However, if the discount rate (determined below) is less than the guidance inflation rate, use the discount rate as the inflation rate, as well.

Discount Rate: Non-Municipal discount rate must be taken from Federal Reserve H.15 report issued on Monday of the week when calculations are done. The correct five-year bond rate to use is found in the "Nominal" section. Use the column that shows the average rate for the previous week. Please print and submit a copy of that page of the report with your Annual Financial Assurance Recertification as the figures may change weekly.

- [View the current H.15 report](#)

Applicable Oregon Administrative Rules

- Municipal Solid Waste Landfill Sites: [OAR 340-094-0140\(4\)\(a\) Cost Estimates](#)
- Non-Municipal Solid Waste Sites: [OAR 340-095-0090\(4\)\(a\) Cost Estimates](#)

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities.

Visit DEQ's [Civil Rights and Environmental Justice page](#).

INCREASE PENALTY RIDER

BOND AMOUNT \$6,008,515.00

BOND NO. 850409

To be attached and form a part of Bond No. 850409, executed by Evergreen National Indemnity Company as surety, on behalf of Valley Landfills, Inc. as current principal of record, and in favor of Oregon Department of Environmental Quality, as Obligee for Post Closure, and in the amount of Six Million Eight Thousand Five Hundred Fifteen Dollars and 00/100 (\$6,008,515.00).

In consideration of the agreed premium charged for this bond, it is understood and agreed that Evergreen National Indemnity Company hereby consents that effective from the 1st Day of April, 2024, said bond shall be amended as follows:

THE BOND PENALTY SHALL BE INCREASED:

FROM: Six Million Eight Thousand Five Hundred Fifteen Dollars and 00/100 (\$6,008,515.00)

TO: Six Million One Hundred Fifteen Thousand Three Hundred Fourteen Dollars and 00/100 (\$6,115,314.00) Post Closure

The INCREASE of said bond penalty shall be effective as of the 1st Day of April, 2024.

Signed, sealed and dated this 7th Day of March, 2024

Evergreen National Indemnity Company
SURETY

BY 
Tatiana Gefer, ATTORNEY-IN-FACT



INCREASE PENALTY RIDER

BOND AMOUNT \$17,765,049.00

BOND NO. 850408

To be attached and form a part of Bond No. 850408, executed by Evergreen National Indemnity Company as surety, on behalf of Valley Landfills, Inc. as current principal of record, and in favor of Oregon Department of Environmental Quality, as Obligee for Closure Coffin Butte Landfill, and in the amount of Seventeen Million Seven Hundred Sixty Five Thousand Forty Nine Dollars and 00/100 (\$17,765,049.00).

In consideration of the agreed premium charged for this bond, it is understood and agreed that Evergreen National Indemnity Company hereby consents that effective from the 1st Day of April, 2024, said bond shall be amended as follows:

THE BOND PENALTY SHALL BE INCREASED:

FROM: Seventeen Million Seven Hundred Sixty Five Thousand Forty Nine Dollars and 00/100 (\$17,765,049.00)

TO: Nineteen Million Two Hundred Thirteen Thousand Two Hundred Eleven Dollars and 00/100 (\$19,213,211.00) Closure

The INCREASE of said bond penalty shall be effective as of the 1st Day of April, 2024.

Signed, sealed and dated this 7th Day of March, 2024

Evergreen National Indemnity Company
SURETY
BY 
Tatiana Gefter, ATTORNEY-IN-FACT



May 13, 2026

Bret Davis
110 NE Walnut Blvd.
Corvallis, OR 97330

Dear Mr. Davis:

At the Board of Commissioners' meeting on April 21, 2026, the Board had questions following the presentation of the Coffin Butte and PRC Annual Report by Republic Services. At the Board's Goal Setting Session on May 12th, the Board directed staff to prepare follow-up questions for Republic Services. At the Board's direction, staff formally requests that the questions below be addressed in the 2024 report. If more convenient, the franchisee may submit the answers to the following questions as an appendix to the report.

1. Fire Safety – The Disposal Site Advisory Committee has requested that Republic Services establish additional fire monitoring, especially during “red flag days.” A Red Flag Warning is issued by the National Weather Service to indicate critical fire weather conditions, including relative humidity (15% or less), wind gusts of 25 mph, extremely dry vegetation and dry lighting. In 2024, there were at least three such days in Adair Village. The DSAC requested that Republic Services provide extra monitoring after hours on these days. Another idea proposed is to install FLIR cameras to monitor potential fires throughout the year. Republic Services declined to implement either of these recommendations.

The threat of fires in recycling facilities, trucks, and landfills has been an increasing concern due to the prevalence of lithium-ion batteries embedded in devices. This concern has led to the passage of the HB 4144 which will require manufacturers to fund and manage a statewide battery recycling program.

For context, Lane County operates the Short Mountain Landfill in Eugene which accepts approximately four times less than the Coffin Butte Landfill's annual intake. Maya Buelow, a Lane County Waste Reduction Specialist, noted that improper disposal of lithium-ion batteries "sparked nearly 60 'thermal events' at Short Mountain last year." That is more than one per week. Lane County Solid Waste Supervisor Keith Hendrix stated that flammable materials like batteries, propane tanks, and charcoal "have been known to start as many as four fires in a single day at the Glenwood Transfer Station and Short Mountain Landfill."

The Board of Commissioners would like to know more about the frequency of fires at the Coffin Butte Landfill, how these types of fires originated, how Republic Services staff responded and how often the Adair Rural Fire and Rescue were called to assist.

2. It appears that the total tons in the 2024 report are identical to the 2023 report. Please confirm that the 2024 numbers are correct.
 - a. From the 2024 CBAR: *During 2024, the landfill accepted 1,032,214 tons of solid waste.*
 - b. From the 2023 CBAR: *During 2023 the landfill accepted 1,032,214 tons of solid waste.*
3. Please include customer information.

- a. How many tons came from private (self-haul) customers -vs- commercial customers? An example (*"Coffin Butte Landfill Tonnage by Type and County"*) from the 2023 report can be found on page 9 (page 13 of the document).
 - b. Please include the number of private vehicles and total vehicles. See Pg. 7 of the 2020 CBAR for an example.
4. Provide information about the events that Republic sponsored.
 - a. HHW events (number of customers, location, tons of HHW accepted).
 - b. Spring Recycle events (# customers, locations, tons diverted) – See page 17 of the 2022 CBAR for an example.
5. Landfill Environmental Trust Fund
 - a. List the amount of the fund as of Dec. 31, 2024 as well as previous years amounts. See page 10 of the 2023 CBAR for an example.
6. PRC – Please include the chart that you have provided in the past (see page 8 of 2020 CBAR for an example) that shows how much material was taken in and how much you sold each year for the past 10 years.
7. In the past you've provided a comparison of how much material is being recovered. An example can be found on page 15 of the 2022 CBAR. Please provide an updated version for 2023 and 2024.
8. Include the 2024 Oregon Recycling Collector Survey as an appendix.
9. Depots – Can you provide a chart showing how many tons of commingled & tons of glass collected at the depots? Ideally, this is tracked from year-to-year. You may not have this, but any estimates on how many daily visits or the total number of people that use the depots. This will be very helpful as we ponder new sites.
10. The report stated that 43.2 million gallons of leachate were treated in 2024.
 - a. How many gallons went to the City of Salem versus Corvallis in 2024 (this same information will be requested for 2025)?
 - b. This is more relevant to the 2025 or 2026 report, but the report (pg. 14 of the 2024 CBAR) states, "Coffin Butte Landfill will no longer send leachate to the City of Corvallis wastewater treatment plant after December 2025. Leachate that was previously going to Corvallis is now headed to a private third-party treatment plant." Who is the private 3rd party treatment plant and how much are you sending them?
11. The 2023 CBAR stated that there were 39,006,573 cubic yards of airspace available, but the 2024 CBAR states that there are 39,591,002 tons, which is 584,429 more cubic yards. Was this due to Cell 6 being excavated?
12. The 2024 CBAR states, "We projected the landfill had 12.9 years of life remaining at the end of 2024." And on the same page it states, "The Landfill had approximately 10 years of life remaining as of

December 2025.” This means that 2.9 years of capacity was used in 2024, even as capacity increased (question 11 above). Please explain why these fluctuations have occurred.

13. Related to the previous two questions, have aerial flyovers using Lidar to measure the “waste in place” continued to be done? If so, please provide the dates or number of flights since 2021?

Thank you for your help with this matter. Please provide this information by June 15th.

Sincerely,

Bailey Payne, Solid Waste Coordinator
Benton County Community Development Department

June 8, 2026

Benton County Community Development Department
Attn: Bailey Payne, Solid Waste Coordinator
4500 SW Research Way
Corvallis, OR 97333

Dear Mr. Payne:

Valley Landfills, Inc. ("Coffin Butte Landfill" or "Landfill") appreciates Benton County's review of the 2024 Coffin Butte Annual Report and the opportunity to respond to the follow-up items identified in your May 13, 2026 letter ("Letter").

As an initial matter, the Franchise Agreement between the County and Coffin Butte Landfill describes the scope of the Annual Report as the following:

"...Franchisee shall furnish to the Board an Annual Report with respect to the environmental condition of the Landfill, covering air, waste Solid Waste Permits, pollution controls, and related issues as determined by both parties."

Landfill is defined as the Coffin Butte Landfill owned and operated by Franchisee. Franchisee is Valley Landfills, Inc.

Over the years, the Annual Report has significantly expanded in scope beyond the environmental conditions of the Landfill and beyond any agreement by the parties on other issues. The Landfill has received continuous requests for additional information, sometimes sporadically, and with no meaningful discussion or input from Coffin Butte Landfill. At present, Coffin Butte Landfill is responding to requests for new data points subsequent to its submission of the 2024 Annual Report (the submission date of which was agreed upon by the parties).

Where a request in the Letter seeks correction or clarification of information properly included in the 2024 Annual Report, Coffin Butte Landfill will provide updated or supplemental information. Where a request seeks material outside the scope of the Annual Report, data from years other than 2024, or information not maintained by Coffin Butte Landfill, we set forth our position, below. We, of course, are happy to engage in discussions so that both the County and the landfill have an opportunity to be heard on additional data points for future reporting years.

1. Fire safety. The County's requests regarding additional fire monitoring and incident reporting are unrelated to the 2024 Annual Report. They are requests for operational modifications and to add a new "issue" of fire safety to the Annual Report.

Regarding the request for operational modifications, Coffin Butte appropriately manages fires at the landfill, which are infrequent. We do not experience a similar frequency of incidents as reported by the Lane County facility. However, we are more than willing to meet and discuss the County's concerns about fire risks associated with increased consumer battery usage and provide the County with additional information about Coffin Butte's fire mitigation operations.

Regarding the request to add fire reporting to the Annual Report, Coffin Butte Landfill agrees to provide summaries of fire incidents in future reports, beginning with the 2026 Annual Report. Please note that, during the recent land use process regarding Coffin Butte's permit expansion, Coffin Butte submitted to the County a call log from Adair Rural Fire & Rescue covering January 1, 2013 to July 25, 2025. The call log indicates that Adair Fire & Rescue responded to Coffin Butte Landfill for fire incidents twice in 2024, representing the first such calls since 2018.

2. 2024 tonnage correction. Thank you for identifying the tonnage typo. Tonnage for 2024 was 1,042,113.

3. Customer Information: We respectfully object to providing the requested level of detail on our customer makeup. It is non-public, competitively sensitive information, and unrelated to the scope of the Annual Report (the environmental condition of the Landfill).

4. Event Sponsorship – Events such as Household Hazardous Waste and Spring Recycling are related to waste and recycling collection. Accordingly, they are sponsored by Corvallis Disposal Co. dba Republic Services of Corvallis. Republic Services of Corvallis reports its sponsorship events to the County.

5. Landfill Environmental Trust Fund The market value as of December 31, 2024 was \$18,997,770.82.

6. PRC. Pacific Region Composting is a separate legal and operating entity from the Coffin Butte Landfill. While the two facilities partner, PRC is not subject to the Franchise Agreement.

7. Material Recovery. This request is unrelated to the environmental condition of the Landfill. Coffin Butte Landfill partners with affiliated Republic Services hauling companies and other third-party haulers to direct haul material to recycling facilities.

8. 2024 Oregon Recycling Collector Survey. This request is unrelated to the environmental condition of the Landfill and outside the scope of the Annual Report. Collection service providers and recycling facilities submit this form to ODEQ.

9. Depots. Coffin Butte Landfill does not own or operate Republic Services affiliated recycling depots. This request is outside the scope of the Annual Report.

10. Leachate disposition. The disposition and location of leachate disposal, including that which is disposed outside of Benton County, is unrelated to the environmental condition of the landfill. However, we transferred 43,061,365 gallons of leachate in 2024.

11. Airspace/capacity. The additional capacity is a result of both continual evaluations of the design plan and tonnage changes. Each year, we review aerial surveys to determine where design changes can be made to increase capacity. Additionally, tonnage changes can result in additional capacity.

12. Fluctuations in airspace/capacity. Please see Response 11.

13. Lidar flyovers and aerial surveys. This request seeks new data not already agreed upon by the parties prior to the submission of the 2024 Annual Report, and data from previous years. We consistently deploy aerial surveys throughout the year for various reasons, including density analysis. We respectfully object to providing this level of detail on future reports as the dates of flyovers does not relate to the environmental condition of the Landfill. The County receives Landfill capacity data annually. If there is something specific the County is trying to understand about our capacity or environmental condition through this request, we are happy to meet and discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Bret Davis", with a stylized flourish at the end.

Bret Davis
General Manager
Coffin Butte Landfill