

February 3rd, 2026

Delivered via email to:

Benton County Board of Commissioners through landfillappeals@bentoncountyor.gov

Case: LU-24-027

Dear Board of Commissioners:

This video testimony is submitted in response to the DEQ Pre-enforcement letter entered into the record BOC4\_BC0022 - Jan 20, 2026 - November2025DEQPEN\_SUBMISSION.

Republic Services maintains there is no problem with fugitive dust from landfill activities.

The DEQ Pre-enforcement Notice contains the following statement on page 7:

*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.*

The video I am entering into the record herewith is just one example of many times I have observed dump operations in the last several years when massive dust plumes from dump activities have occurred. These dust plumes, and their associated odors, represent serious interference with uses on adjacent property. Republic Services makes no effort to prevent or mitigate these occurrences.

You will also note that the video at 0:20-0:30 clearly shows torn tarps "covering" the recently placed garbage, also discussed in the DEQ letter.

Mark Yeager, PE, 37269 Helm Drive, Corvallis OR

[mayeager@gmail.com](mailto:mayeager@gmail.com)

File: Coffin Butte Dust Cloud Video