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LU-24-027 - in response to the Oregon Department of Environmental Quality (DEQ) Pre-Enforcement Notice (PEN) 2025-PEN-10025 served on Valley Landfills Inc. (VLI), a subsidiary of Republic Services Inc., on November 6, 2025

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**Date** Fri 1/23/2026 4:07 PM

**To** Coffin Butte Landfill Appeals <landfillappeals@bentoncountyor.gov>

**Cc** Steve Gerritson <sgerritson@earthlink.net>

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January 20, 2026  
Benton County Board of Commissioners  
205 NW 5th Street  
Corvallis, OR 97330

**RE: Formal Objection to the Proposed Expansion of Coffin Butte Landfill—Citing a History of Non-Compliance, Public Health Risks, and Failure to Act on Voluntary Measures**

Dear Commissioners,

This testimony is in response to the Oregon Department of Environmental Quality (DEQ) Pre-Enforcement Notice (PEN) 2025-PEN-10025 served on Valley Landfills Inc. (VLI), a subsidiary of Republic Services Inc., on November 6, 2025.

As you convene for to reevaluate the proposed expansion of the Coffin Butte Landfill, I urge you to uphold the retraction of your prior approval and formally deny the expansion permit.

The DEQ PEN lists seven Class I violations – the most serious category of violations according to DEQ – arising from VLI's and Republic's failure to comply with state and federal regulations in their management of Coffin Butte Landfill.

Based on these DEQ findings, it is evident that the company has repeatedly failed to manage its existing facility responsibly and cannot be trusted with an expanded operation.

Republic's national operational history shows that the serious violations enumerated in DEQ's PEN are not isolated incidents, but rather part of a recurring pattern. According to the [Good Jobs First Violation Tracker](#), Republic Services has incurred over **\$177.4 million** in penalties across more than 285 documented enforcement actions nationwide since 2000. This is not a company with occasional compliance issues; it is a company with a structural pattern of environmental negligence.

I ask you to consider the following evidence:

**1. A History of Regulatory Non-Compliance and Refusal to Mitigate**

The DEQ notice detailing **seven serious environmental violations** at Coffin Butte—including dangerous methane leaks at levels 100 times the federal limit—is deeply alarming. Crucially, VLI's response to DEQ on

December 30, 2025, shows that the company **refuses to comply with "voluntary" measures** recommended by the DEQ, such as enhanced drone surveillance for leak detection.

- **The Flaw of "Voluntary" Compliance:** This pattern demonstrates a critical operational flaw: Republic Services will only act when compelled by enforceable law. The problem is that Benton County lacks the specific regulatory infrastructure to enforce complex, day-to-day environmental mandates. Any "conditions of approval" attached to this permit would be functionally toothless, as the company has already shown it will ignore measures lacking immediate, punitive enforcement.
- **National Precedent:** This mirrors issues nationally, where in **December 2025**, Murfreesboro, TN, sued Republic for attempting to "leapfrog" local planning boards to avoid oversight during an expansion request.

## 2. Severe Public Health and Cancer Risks

The emissions from Coffin Butte pose documented health risks that are borne entirely by local residents.

- **Carcinogenic Exposure:** Inspections confirmed leaks of **benzene and vinyl chloride**, both known human carcinogens linked to elevated risks of leukemia, liver, and lung cancers.
- **Health Externalities:** Medical studies show that children living near such sites suffer from suppressed immunity and chronic respiratory distress. These lifetime healthcare costs are significant externalities that are never factored into Republic's administrative fines.

## 3. Destruction of Community Wealth

The presence of a non-compliant landfill creates a permanent loss of property value that dwarfs the administrative fines Republic pays.

- **20%–30% Equity Loss:** Homes near sites with documented health violations experience a **20% to 30% devaluation** in home equity. For our community, this represents a loss of tens of millions of dollars in generational wealth—a cost borne by our residents, not the corporation.

The data from the **Good Jobs First Violation Tracker** confirms that Republic Services views environmental compliance as a negotiable expense rather than an obligation. Their refusal to adopt basic voluntary safety measures in response to the DEQ PEN makes it clear that they are unsuitable to operate an expanded facility in Benton County.

We urge you to protect our residents, our environment, and our local economy by denying the Coffin Butte expansion permit.

Sincerely,

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