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To: [Coffin Butte Landfill Appeals](#)
Subject: Testimony On Coffin Butte Landfill
Date: Tuesday, January 27, 2026 9:42:46 AM

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- AERMOD is not able to model emissions in a thermal inversion, which is a very common weather pattern in the Willamette Valley during the cold months. 82% of complaints occur during the fall, winter, and spring, the seasons where inversions are common in the Willamette Valley.

DEQ has found that Coffin Butte Landfill is not complying with federal and state requirements for its Gas Collection and Control System (GCCS), and they found the monitoring—used to ensure the GCCS is capturing all the gas it should be—is inadequate, also violating the law.

- Coffin Butte’s GCCS is not properly designed for a landfill of its size. The system is too small to handle the amount of gas produced by the garbage it contains. Coffin Butte’s GCCS has been shut off for extended periods of time. For example, the GCCS was not operating for 15 total calendar days in the first quarter of 2025. GCCS should be operational 24 hours a day.
- Coffin Butte’s flare has also been shut off for extended periods. While the GCCS was still collecting gas, that gas was vented straight into the atmosphere without treatment.
- Coffin Butte is not monitoring an average of 72% of their landfill for leaks. Coffin Butte cited these areas as “exempt” from monitoring despite the law requiring them to get DEQ approval for exemptions. DEQ has never approved an exemption for Coffin Butte.
- Independent EPA and DEQ inspectors and community members have repeatedly found and documented holes in the landfill liner, which is supposed to stop gas from escaping the landfill. Coffin Butte maintains they inspect the liner daily for holes, but other parties have found bushes and small trees growing out of the liner, which suggests holes go unaddressed for extended periods of time allowing vegetation to grow out of them.

DEQ found that Coffin Butte’s LANDGEM calculations are wrong and are under estimating the total landfill gas produced by the facility.

We ARE Citizens of Oregon. You live here, too. Those in powerful places need to protect citizens and currently we can see the private sector given inspection duty does not want to do that.

The DEQ has pointed you to the failure.

Even where I reside, the air quality remains poor and I suffer. We need to mask up with medical masks not for covid but rather because that air is poor and Oregonians love the outdoors. So outdoor air being unpure, ruins what we value and what we want to experience. It doesn't have to remain this way. Do your job and act on this poor behavior causing pollution. We deserve relief from polluted air. It's not been a great time for weeks to breathe in the air.

Best,
Mel Scott

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"People pay for what they do, and still more for what they have allowed themselves to become. And they pay for it very simply; by the lives they lead."

- James Baldwin