

From: [Mira Mason-Reader](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: WEB FORM SUBMISSION - LU-24-027 Coffin Butte Proposed Expansion Written Testimony
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Subject of Testimony: Coffin Butte landfill expansion

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Written Testimony:

As a longtime resident of Benton County, I vehemently oppose the Coffin Butte landfill expansion. Republic Services has proven time and time again to be untrustworthy and dangerous for the citizens of Benton County and Oregon as a whole. The Oregon Department of Environmental Quality's (DEQ) Pre-Enforcement Letter confirms this, with some highlights including:

- Coffin Butte uses a program called LANDGEM to calculate its gas emissions. Oregon DEQ has found that Coffin Butte consistently underestimates—and underreports—the amount of gas produced by the facility.
- Coffin Butte's gas collection system is verifiably inadequate for a landfill of its size.
- Coffin Butte has been known to leave the gas collection system shut off for extended periods of time, totaling 15 calendar days in the first quarter of 2025 alone. It is supposed to be operational 24/7.
- The flare, which is meant to burn off gas emissions, has been found to be shut off for extended periods of time, allowing emissions into the atmosphere without mitigation.
- Coffin Butte claims that 72% of its landfill is exempt from monitoring, meaning that they do not monitor nearly 3/4 of the landfill for leaks. Only Oregon DEQ can approve monitoring exemptions; they have approved no such exemptions for Coffin Butte.
- EPA, DEQ, and community-led inspections of the landfill liner, which is vital to containing gas emissions, have repeatedly found and documented numerous holes that allow gas to escape unmitigated. In some instances, trees and bushes are growing out of the holes, which means that Coffin Butte has failed to address them for significant periods of time.

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.

Do not let a corporation chose profits over the people of Benton County. Please overturn your previous approval of this landfill expansion and listen to the people of Benton County.

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