

From: [BILL GELLATLY](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: LU-24-927 Landfill Testimony from Bill Gellatly
Date: Tuesday, January 27, 2026 1:44:05 PM
Attachments: [Landfill Reconsideration 27jan2025 - Citizen Testimony by Bill Gellatly.docx](#)

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Hello,

Please find my attached testimony.

Please note that it references the testimony of Mid Willamette Bird Alliance. That testimony carries today's date.

Thank you,

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Date: January 27, 2026

Reference: LU-24-027, Coffin Butte Landfill Conditional Use Permit Application

Board of Commissioners Reconsideration

To: Benton County Board of Commissioners
4500 SW Research Way
Corvallis, OR 97333-1139

Thank you for the opportunity to provide new testimony in response to the Oregon Department of Environmental Quality (DEQ) Pre-Enforcement Notice issued November 6, 2025. As a local resident with engineering, quality and business background, I again respectfully urge the Benton County Board of Commissioners to deny the expansion of the Coffin Butte Landfill in light of this significant new evidence formally entered into the record since the close of the original proceedings.

My concerns stemming from the DEQ Pre-Enforcement Notice documenting multiple Class I violations are simple and straightforward. I'll refer to Valley Landfills, Inc. and Republic Services as the Franchisee.

For clarity, my testimony builds on the testimony (also dated today) from Mid Willamette Bird Alliance. While I am a board member of that organization, this is my independent testimony. The Franchisee should be using a continuous monitoring, recording and active-control system.

- Monitoring and controlling of emissions are separate activities. Regular measurements are required for both, but controlling an operation involves use of the monitoring data in a proactive manner on a timely basis.
- Monitoring systems record data from sensors. That data can be arranged as Normal, Warning and Action. They act like traffic signals. If a yellow light is triggered by a measurement, controls can define what actions are required. If a red light is triggered, it means that the control limits have been exceeded and that emergency conditions need to be invoked. We all know these systems by looking at the dashboard of our cars.

Much of the earlier testimony, especially from wind and odor reports has been fraught with conflict and hearsay. The dispersion of gaseous emissions is quite dependent on the microclimates surrounding the landfill. It also affects sound transmission.

I will assert that, in the long run, the Franchisee cannot afford NOT to implement both monitoring and controls. Taking advantage of the very affordable crowd-sourced data collection equipment that powers Weather Underground stations is both economical and of proven reliability. The Franchisee has stated that the lack of cellular coverage prevents the implementation of an effective monitoring system. This is simply not true; similar systems have been in wide use for more than 80 years, and today it is dramatically easier to implement.

The lack of cellular connections can be made irrelevant by using the same drone collecting data on gas concentration to also fly by a appropriately dense number of weather monitoring stations. That way, the data can be transferred as frequently as every hour, yet collect continuous data. All data is then downloaded to a single centrally-located station at the landfill.

A short list of measurements that can replace the weaknesses of anecdotal reporting are:

- Temperature
- Wind Speed
- Wind Direction
- Relative Humidity
- Noise from regular hauling and compacting equipment operation
- Noise from daily capping or expansion of cell membranes.

Finally, the questions of calibration, ownership, traceability to standards are all well understood by companies who specialize in control systems. Ideal would be a website where the data is openly available, just as with everyday weather. Recording of on-site conditions like small fires, equipment breakdowns, and visual indicators of any system that has been in the “yellow” or “red” zone, as well as the time required to return to a “green-light” conditions.

Think of the clarity that is offered by such a system. Consider the publications of this data as an audit that runs 24 hours a day. This ‘radical’ open-ness has been in place in the semiconductor business with very positive results.

I urge you to either insist on such a systems as new Condition Use enhancements, or, for the Benton County Board of Commissioners to DENY the Coffin Butte Landfill expansion.

Respectfully submitted,

William (Bill) Gellatly
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