From:	Ken Eklund
To:	Coffin Butte Landfill Appeals
Subject:	Transferring ENRAC evidence to Commissioners" Public Record: 5 of 13
Date:	Tuesday, August 19, 2025 5:25:17 PM
Attachments:	ENRAC - EPA Jun 2024 CBL Inspection Report - Conley.pdf

ENRAC supplied the evidence it used for its Recommendation to Deny to the Planning Commission; the link to its Google Drive is in the ENRAC Recommendation to Deny, which appears to have been omitted from the Commissioners' Public Record, but it is in the Planning Commission Public Record here:
https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=7ea953a15b3ad

This series of emails transfers the ENRAC material into the Commissioners' Public Record. There are 63 files total in the ENRAC evidence archive; I am transferring them all into the Commissioners' Public Record. – Ken Eklund

Ken Eklund, writerguy

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Creator of
World Without Oil
Ed Zed Omega
FutureCoast
and other storymaking games

REGION 10
SEATTLE, WA 98101

Clean Air Act Partial Compliance Evaluation Inspection Report

Valley Landfills Inc. Coffin Butte Landfill

2917 Coffin Butte Rd
Corvallis, Oregon

Inspection Date: June 21, 2024

Report Author Signature

Sara Conley
Clean Air Act Inspector
EPA Region 10
Enforcement and Compliance Assurance Division
Air Enforcement Section

Peer Review Signature

Steve Rapp
Environmental Engineer
EPA Office of Enforcement and Compliance Assurance

Air Enforcement Section (AES) Manager Signature

Elizabeth Walters
Air Enforcement Section Manager
EPA Region 10

Table of Contents

Attachments

I. Basic Facility and Inspection Information

Facility:	Valley Landfills Inc. 2917 Coffin Butte Rd Corvallis, Oregon 97330
Mailing Address:	2917 Coffin Butte Rd Corvallis, OR 97330
AFS/FRS Number:	110004808423
SIC:	4953 Refuse Systems
NAICS:	562212 Solid Waste Landfill
Permit Number:	02-5902-TV-01
Facility Contacts:	Ian Macnab Environmental Manager, Oregon Valley Landfills Inc. ianmacnab@republicservices.com Broc Kienholz Operations Manager Coffin Butte Landfill Republic Services bkienholz@republicservices.com Phil Caruso Environmental Specialist Republic Services pcaruso@republicservices.com
U.S. EPA Inspectors:	Sara Conley Air Enforcement Section (AES) Enforcement and Compliance Assurance Division (ECAD) U.S. EPA Region 10 1200 Sixth Ave. Seattle, WA 98101-3188

	(206) 553-6914 Conley.Sara@epa.gov
	Alyson Skeens Air Enforcement Section (AES) Enforcement and Compliance Assurance Division (ECAD) U.S. EPA Region 10 950 West Bannock Street, Suite #100 Boise, Idaho 83702-5999(208) 378-5748 Skeens.Alyson@epa.gov
	Steve Rapp Air Enforcement Division (AED) Office of Civil Enforcement (OECA) U.S. EPA 1200 Pennsylvania Avenue Washington, DC 20460 (202) 250-8961 Rapp.Steve@epa.gov
ODEQ Representatives:	Becka Puscas Interim Manager, Office of Compliance and Enforcement Oregon Department of Environmental Quality (503) 229-5058 Katie Eagleson – Air Toxics Permitting Engineer Heather Kuoppamaki - Senior Air Quality Engineer Alex Haulman – Air Quality Inspector, Eastern Region Laura McWhorter – Natural Resource Specialist
Date of Inspection:	June 21, 2024
Inspection Start/End Times:	9:45 – 16:30
Inspection Notice:	This was an unannounced inspection. At approximately 9:00am on June 21, 2024 I called Ian Macnab to let him know that we would be arriving at the facility in about 45 minutes.

II. Purpose of Inspection

This was a multi-media Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA). Inspector Conley, EPA Region 10, led the inspection and was assisted by EPA inspectors Alyson Skeens, EPA Region 10, and Steve Rapp, EPA AED/OECA, (collectively, "the inspectors"). The regulatory state air agency, the Oregon Department of Environmental Quality, was made aware of the inspection beforehand and participated in the inspection.

This was a partial compliance evaluation by the U.S. Environmental Protection Agency Region 10. The purpose was to identify potential compliance concerns with CAA regulations, specifically the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills, 40 CFR Part 63 Subpart AAAA and 40 CFR Part 61 Subpart M—National Emission Standard for Asbestos. The facility operates under a Title V Air Operating Permit (302-9502-TV-01. The facility is also subject to the federally enforceable Oregon State Plan for existing municipal solid waste landfills. The facility is regulated under the Oregon Administrative Rules at Chapter 340, Division 236 (OAR 340-236-0500) entitled "Solid Waste Landfills: Emission Standards for Municipal Solid Waste Landfills."

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from a subsequent records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

III. Compliance History

EPA's Enforcement and Compliance History Online, ECHO[1], lists four on-site CAA inspections since 2022.

CAA	*PCE On-Site*	*EPA*	*06/21/2024*
CAA	FCE On-Site	State	07/11/2022
CAA	*PCE On-Site*	*State*	*07/07/2022*
CAA	*PCE On-Site Monitoring/Sampling*	*EPA*	*06/23/2022*

[1] See https://echo.epa.gov/

The ECHO database does not list formal or informal enforcement actions in the last three years for the CAA or other statutes.

IV. Pre-Inspection Observations

We went directly to the facility. No observations were made prior to the scheduled inspection.

V. Facility and Process Description

The following facility description is based on information provided by a facility representative in the opening conference as well as documents submitted by the facility to ODEQ.

The Valley Landfills Inc. facility ("the landfill," "the facility," or "Coffin Butte") is located in Benton County Oregon. The landfill began accepting waste in 1978 and has a design capacity of approximately 39.7 tons. In 2021 there were 312 active vertical wells and a landfill gas control capacity equal to 5000 standard cubic feet per minute (scfm). Approximately 110 acres of the landfill have been constructed. The landfill directs landfill gas to an electrical generation plan owned and operated by the Pacific Northwest Generating Cooperative (PNGC). PNGC has a total of five engines capable of combusting 1915 standard cubic feet per minute (scfm). The PNGC facility has two backup flares with a combined capacity of 3,000 scfm.

The landfill uses interim cover consisting of temporary plastic covers. Temporary plastic cover is 12-mil lightweight plastic or 45-mil ethylene propylene diene monomer (EPDM) rubber. The cover material is anchored to the surface of the landfill. Sheet seams are sewn together, taped, or made to overlap with sandbags. Interim soil cover is typically 12 inches thick. Interim soil and plastic cover are placed to control landfill gas prior to final cover placement.

According to the facility, final cover will be installed once areas have settled. The final cover will consist of an under-drainage layer, 24" of soil, geomembrane and a drainage layer.

VI. Entry and Opening Conference

Inspectors Rapp, Skeens and I arrived at 9:40am along with representatives from ODEQ. The opening conference began at 9:45am.

Opening conference attendees included:

ODEQ:

- Becka Puscas
- Katie Eagelston
- Heather Kuoppamaki
- Alex Haulman
- Laura McWhorter

Valley Landfills Inc.

- Ian Macnab
- Broc Kienholz
- Phil Caruso

Inspectors Rapp, Skeens and I presented our credentials to Mr. Macnab. I explained the purpose of the inspection was to evaluate compliance with the Clean Air Act and that we would be primarily focused on conducting surface emission monitoring (SEM). I explained that we had three instruments with us, the two TVA 2020s[2] and an Inficon IRwin SX[3], which can be used to measure surface concentrations of methane. I explained that we would calibrate each instrument following the opening conference. We also notified the facility that we planned to take photos with a digital camera[4] and that we brought a Forward Looking Infrared (FLIR) Camera[5] capable of visually monitoring methane. I explained that all measurements, photos, video, and other information collected during the inspection would be included in the inspection report. I also described the timeline of the inspection and set expectations that we would be asking questions of the facility staff as we conducted the inspection.

I asked about the age of the landfill and about the cells in the landfill that are subject to the gas collection and control and surface emission monitoring (SEM) requirements under the federal CAA regulations for Municipal Solid Waste (MSW) Landfills. The facility representatives explained that the landfill first accepted waste in the 1970s. There is waste older than 5 years in every cell of the landfill. Inspector Rapp asked if there are any areas of the landfill that are currently excluded from gas collection and control. The facility representatives said that long ago there were areas but not now. At this landfill there is a cell of asbestos monofil as well as a small area that has asbestos buried in-place. Most asbestos is in the designated asbestos cell.

Mr. Kienholz explained how waste shipments are accepted at the facility. Trucks with municipal solid waste are weighed at the scale house. Mr. Kienholz stated that the commercial trucks have an account with Republic Services and if they bring in special wastes that information is recorded at the scale house. New waste is placed in active fill areas onsite. There is a new cell under construction at the landfill which will be located near the asbestos cell.

Inspector Skeens asked what the approximate volume of asbestos containing waste (ACW) Coffin Butte received and the customer breakdown between public and commercial. Mr. Macnab stated that Coffin Butte receives approximately 5,000 to 10,000 tons of ACW per year.

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[2] Thermo Fisher Scientific Model TVA 2020, Serial Number 202023127089 and Thermo Fisher Scientific Model TVA 2020, Serial Number 202017092713

[3] Inficon IRwin SX device, using the Elkins Earthworks software, held by EPA OECA/AED, Serial #: 580-01092006439

[4] Olympus Tough TG-6, Serial Number BJ5B27623

[5] FLIR Gx620 1060080

Macnab stated that Coffin Butte does not typically receive ACW from the public and most shipments are from commercial contractors. Mr. Macnab stated that Coffin Butte will see loads coming from Coast from Portland to Eugne up to Willamette. Coffin Butte rarely receives waste from out of state but if they do it would most likely be from Washington.

Inspector Skeens asked if Coffin Butte has turned ACW loads away for discrepancies. Mr. Macnab stated that they have turned loads away before. The load is inspected when dropped off and workers will require bags to be taped if there are rips or tears. Inspector Skeens ask if they could see the asbestos cell during the inspection. Mr. Macnab states that the asbestos cell was downhill from the construction site and advised against going there for safety concerns. Inspector Skeens asked if Coffin Butte had plans to layer over the asbestos cell with MSW. Mr. Macnab stated that there are plans but he was not sure when that would take place.

Inspectors Rapp and I asked about how the facility monitors surface emissions and the landfill gas collection system. The facility representatives explained that their consultant, SCS, provides a SEM route map and performs the SEM monitoring on foot. The facility representatives stated that the most recent surface emissions monitoring was performed a few months ago. The facility representatives do not observe the surface emission monitoring conducted by SCS. According to the facility representatives, if SCS identifies surface emission exceedances, SCS reports the exceedances to Republic Services and Republic Services will make the repairs. Inspector Rapp asked if there are any areas of the landfill that are not monitored for surface emissions. The facility representatives said that they do not monitor dangerous areas such as where there active filling is occurring.

I asked who conducts the well parameter monitoring and the facility told me that PNGC Power monitors the wells. PNGC Power operates the landfill gas to energy facility. I asked about interior well installations and the facility representatives told me that wells will be installed beginning in July. The facility has a combination of vertical and horizontal interior wells installed and the facility representatives explained that the active fill area is managed with horizontal wells. The facility reported that cover integrity monitoring is conducted by in-house staff.

Inspector Rapp asked if the flares were operating that day. The facility representatives indicated that the landfill was producing approximately 1800 scfm of which approximately 1000 scfm was being routed to the engines and the remainder to flares. The inspectors indicated that they would like to visit the flare station later during the facility walkthrough.

I asked the facility for a printed map of the landfill and we discussed where we planned to conduct the monitoring with Mr. Macnab. I explained that we would not be conducting a full surface emission monitoring survey over the entire landfill and that our inspection would be limited to an area before lunch and one after lunch. I decided to start with the area closest to the facility's office for the morning and then to visit the flare station and northeastern area in the afternoon. The opening conference concluded at approximately 10:50. Immediately following the opening conference we calibrated the two TVA 2020s and the Irwin.

VII. Facility Walk-Through

The table of surface emissions exceedances and digital image log is included as Attachment 1 to this report. A map of the Surface Emissions Monitoring (SEM) path walked by Inspector Rapp with the EPA IRwin is included in Attachment 2.

A. Morning SEM on Southwest Face of The Landfill

The walkthrough began at about 11:00. The inspection team was escorted by Mr. Macnab and Mr. Caruso. We began the monitoring with one TVA 2020 operated by inspector Skeens, another TVA 2020 operated by Mr. Haulman of ODEQ, and the EPA IRwin operated by Inspector Rapp.

Mr. Macnab estimated that we were over Cell 3 of the landfill. The lower side of the slope was vegetated, and Mr. Macnab stated that they were in the process of getting the vegetated surface of the landfill mowed. We did not measure any exceedances on the lower-vegetated section of the landfill slope. As we moved up the slope of the landfill we began to walk on the 45-mil ethylene propylene diene monomer (EPDM) rubber covered area. The 45-mil EPDM cover is considered interim cover. Mr. Macnab explained that this area would remain covered with 45-mil EPDM until there was either more waste placed in this cell or the area is placed under final cover. The EPDM material is weighed down with sandbags and straps it is also bolted to the surface in places.

We traversed a section of the southwest side of the landfill moving from one penetration to another and monitoring surface emissions along the way. I noticed that when the wind was blowing from the west there was an odor that smelled like landfill gas. There were a number of exceedances, readings of 500 ppm methane or larger, coming from holes or tears in the cover material. I noted that there were a number of plants growing out of the cover material at the top of the western side of the landfill in the area along the edge of Cell 3 and Cell 5. Some of the plants were between 1.5 to 3 feet tall. We did not monitor at the plant locations because of filling activity immediately uphill from that location. We made our way down the landfill slope and continued to take surface emission measurements with the TVAs and the Irwin. We took a break for lunch at approximately 13:00. The Irwin, operated by Inspector Rapp, detected 31 locations where methane emissions were 500 ppm or greater in this section of the landfill. See Attachment 1.

B. Afternoon SEM at Flare Station

We returned to the facility at 14:30 and performed a calibration bump check on the TVAs and the Irwin which both units passed. See Attachment 3. Mr. Macnab informed us that SCS would be coming the week of June 24th to conduct penetration monitoring. We followed Mr. Macnab in our vehicle to the flare station, the ODEQ representatives joined us for this portion of the afternoon. At the time of our visit, a new enclosed flare was onsite but construction of the flare was not complete and the flare was not operational. I operated the FLIR camera and recorded a

video, FLIR0093, of a leaking flange/blank plate at the flare station. The Irwin measured emissions above 500 ppm at the flange (photo 1734). See Attachment 1. The ODEQ team departed the flare station at approximately 15:00.

C. Afternoon SEM at Eastern Face of The Landfill

We followed Mr. Macnab in our vehicle to a pull-off at the northeastern face of the landfill. There was a noticeable landfill gas odor at the base of the slope. The Irwin measured methane greater than 500ppm at a liquid separation pipe for a horizontal collector. Inspectors Rapp and Skeens monitored surface emissions while we walked up the eastern slope of the landfill. We made our way up the slope walking from one wells or other penetrations to another and monitored surface emissions along the way. We also stopped at areas where visual inspection indicated possible surface emissions such as holes in the cover material. We identified 9 locations with emissions over 500ppm methane along our path. See Attachment 1. The walkthrough ended at approximately 16:00.

D. Asbestos

The inspectors did not observe the asbestos cell due to safety concerns Mr. Macnab expressed during the opening conference.

VIII. Closing Conference

At 16:00, our group returned to the facility conference room to discuss the inspection and conduct the closing conference. I led the closing conference and summarized the parts of the facility we had visited during the inspection and our observations related to CAA. I went through my inspection notes and described potential compliance concerns from the inspection. The following were identified as potential compliance concerns during the closing conference:

1. EPA monitored only a portion of the landfill surface and found numerous methane emissions at 500 ppm and higher, including at holes in the cover material. We identified many of the approximately 40 exceedances at locations where the cover material was damaged. Inspectors had noticed some plants growing out of the cover material near the areas where we monitored for emissions.
2. EPA monitored a flange at the flare station had methane emissions over 500ppm. The facility indicated that they were repairing this flange while we were in the opening conference.
3. One of the wellheads EPA monitored to was open to the atmosphere and the IRwin measured emissions over 500ppm.

Inspector Rapp and I discussed EPA's follow-up from the surface emission monitoring EPA conducted during the inspection. We explained that we would send the locations of the

exceedances and the readings within a week. We explained the 10-day re-monitoring would be due within 10 days following the facility's receipt of the list of exceedances.

I listed the records I needed to further evaluate the facility to Mr. Macnab. I explained that the inspection would not be complete until I have reviewed all the records that the facility submitted, reviewed my notes, and written an inspection report. Inspector Rapp, Skeens, and I thanked the facility representatives for their time and assistance and departed the facility at 16:30.

IX. Post Inspection Activities

A. Records Review

The facility provided a response to our information request on August 16, 2023.

Table 1: Records Review

Records Requested

Electronic copy of a map or maps: • **Including the locations of all wells and an indication of the well type.** • **Indicating the cell outlines on the landfill.** • **Indicating the boundaries of each phase of the landfill.** • **Indicating the most recent planned path for surface emission monitoring, including areas excluded from monitoring.**
Response: The facility provided all of the requested maps in an electronic format.
The most recent two quarters of gas migration/perimeter probe readings.
Response: The facility provided monthly readings from January 2024 through July 2024. The permitter probe readings recorded for the last two quarters were all 0.0% methane.
Electronic copy of the most recent design plan.
Response: The facility provided the requested record.

10 most recent ASM-4 for commercial loads.
Response: The facility provided 10 ASN-4 forms.
Last 6 months of landfill cover monitoring records.
Response: The facility provided records for each month from January 2024 through June 2024.
Last three months of all well readings, including all parameters measured. Please provide in an excel readable file type.
Response: The facility provided the requested data.
Odor complaints received in the last 6 months.
Response: The facility provided records covering December 2023 through June 2024, all months had a complaint about odor.
Electronic copy of the two most recent semi-annual (or annual) reports.
Response: The facility provided the two most recent semi-annual reports. One dated February 13, 2024 covering the reporting period of July 1, 2023 through December 31, 2023 and one dated July 16, 2024 covering the reporting period of January 1, 2024 through June 30, 2024.
2 most recent quarterly surface emission monitoring surveys
Response: Facility provided both of the reports we requested.

B. <u>Surface Emission Monitoring Follow-up</u>

The facility submitted the following documents on August 23, 2024

SEM Repair tracking – listed repairs but not the date of the repair, see Attachment 5.

Second Quarter Emission Monitoring - June 11, 16, 18, 24, 26, and July 6, 16, and 26, 2024, OAR landfill surface emissions monitoring (SEM) performed by SCS Field Services (SCS) at the Coffin Butte Landfill.

EPA's surface emissions results, received by the facility on June 26, 2024, indicated that forty-one (41) locations exceeded the 500 ppmv maximum concentration. The required first and second 10-day (Oregon Administrative Rule) follow-up monitoring performed by SCS on July 6, and 16, 2024, indicated that not all locations returned below compliance limits as required, following system adjustments and remediation by site personnel. Based on these monitoring results, and in accordance with the Oregon State Regulations, the site is required to perform a system expansion within 120 days of the third detected exceedance or November 13, 2024.

Attachment 1: EPA Inspection Photo, Video and SEM Log

Attachment 1 – EPA Inspection Photo, Video and SEM Log
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A1	6/21/2024 14:11	6/21/2024 11:11	44.69752	-123.233986	4900	1000	P6210151, P6210152	Exceedance at well
--							P6210153	Photo showing the side of the landfill looking east.
--							P6210154	Photo of a well with cover gathered around the base
A2	6/21/2024 14:21	6/21/2024 11:21	44.697938	-123.234216	10011	3%	n/a	
A3	6/21/2024 14:23	6/21/2024 11:23	44.698045	-123.234395	1271	3700	n/a	
A4	6/21/2024 14:29	6/21/2024 11:29	44.698033	-123.234661	1622	1000	P6210155, P6210156	Exceedance measured at base of well
A5	6/21/2024 14:30	6/21/2024 11:30	44.697969	-123.234744	1459	1600	P6210157	Exceedance at opening in cover
							P6210158	Penetration in cover
A6	6/21/2024 14:33	6/21/2024 11:33	44.698005	-123.235072	14097	>1000	P6210159, P6210160, P6210161	Exceedance located at support on left
A7	6/21/2024 14:35	6/21/2024 11:35	44.698088	-123.235163	16501	20000	P6210163	Exceedance at tear in cover
A8	6/21/2024 14:37	6/21/2024 11:37	44.698123	-123.235294	1118	800	P6210164	Exceedance at vegetation growing out of cover
A9	6/21/2024 14:40	6/21/2024 11:40	44.698127	-123.235513	2719	1.30%	P6210165	Exceedance at tear in cover
A10	6/21/2024 14:41	6/21/2024 11:41	44.698197	-123.23546	4762	1.00%	P6210166, P6210167	Exceedance at tear in cover, at worn patch
A11	6/21/2024 14:42	6/21/2024 11:42	44.698206	-123.23543	8350	20000	P6210167	Exceedance at tear in cover at a rock in background of 167

Attachment 1 – EPA Inspection Photo, Video and SEM Log
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A12	6/21/2024 14:45:00	6/21/2024 11:45	44.69817	-123.235601	1597	2300	camera battery died	
A13	6/21/2024 14:48	6/21/2024 11:48	44.698197	-123.235671	1839	1000		Exceedance at tear in cover
A14	6/21/2024 14:49	6/21/2024 11:49	44.698184	-123.235675	1182	2000		Exceedance at tear in cover
A15	6/21/2024 14:51	6/21/2024 11:51	44.698257	-123.235666	4253	4255		Exceedance at patched area with new hole in cover
A16	6/21/2024 14:52	6/21/2024 11:52	44.6983	-123.235524	9694	TVA flame out		flame out is generally when > 20000
A17	6/21/2024 14:57	6/21/2024 11:57	44.698489	-123.235238	2967	not taken		Exceedance at tarp hole
A18	6/21/2024 15:00	6/21/2024 12:00	44.698836	-123.235078	2900	2200		Exceedance at wellhead cluster
A19	6/21/2024 15:02	6/21/2024 12:02	44.698871	-123.23504	4436	1300		Exceedance at flange
A20	6/21/2024 15:06	6/21/2024 12:06	44.699096	-123.234886	118265	TVA flame out		The cap is off of this well, exceedance at the top.
A21	6/21/2024 15:09	6/21/2024 12:09	44.699247	-123.235311	51151	13000		
A22	6/21/2024 15:11	6/21/2024 12:11	44.699114	-123.23529	1412	1200		
A23	6/21/2024 15:13	6/21/2024 12:13	44.698985	-123.235414	8110	1100		
A24	6/21/2024 15:18	6/21/2024 12:18	44.698458	-123.234777	7443	1200		Exceedance at penetration
A25	6/21/2024 15:21	6/21/2024 12:21	44.698393	-123.234706	8054	12000		Exceedance at BV92
A26	6/21/2024 15:23	6/21/2024 12:23	44.698392	-123.234575	4502	4600		Exceedance at hole in tarp
A27	6/21/2024 15:25	6/21/2024 12:25	44.698351	-123.234173	12969	1.30%		Exceedance at3V93
A28	6/21/2024 15:28	6/21/2024 12:28	44.698182	-123.23397	4339	2400		Exceedance at hole in tarp, 3V83
A29	6/21/2024 15:31	6/21/2024 12:31	44.698236	-123.233457	55729	>2%		Exceedance at tear at boot where horizontal pipe is coming out of the cover
A30	6/21/2024 15:33	6/21/2024 12:33	44.698186	-123.233425	2368	1800		Exceedance at liquid separation
A31	6/21/2024 15:48	6/21/2024 12:48	44.696522	-123.233878	16740	1.50%		Exceedance at Cell 1 sump, outside of the landfill footprint.
--							FLIR0091	Accidental video
--							FLIR0092	Accidental video

Attachment 1 – EPA Inspection Photo, Video and SEM Log
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A32	6/21/2024 17:49	6/21/2024 14:49	44.6974	-123.224024	7700	not taken	FLIR0093	Exceedance at Flare Station flange, in video the flange on the right side
--							FLIR0094	Accidental video
--							FLIR0095	Accidental video
A33	6/21/2024 18:14	6/21/2024 15:14	44.701817	-123.22582	6393	2000+	DSCN1734	Exceedance at liquid separation for horizontal
A34	6/21/2024 18:21	6/21/2024 15:21	44.701431	-123.226183	7110	1200	DSCN1735	Exceedance at tear in the material at the base of 5V22
A35	6/21/2024 18:24	6/21/2024 15:24	44.701263	-123.226236	12247	1.30%		
A36	6/21/2024 18:31	6/21/2024 15:31	44.700978	-123.227052	654	10000	DSCN1736	
A37	6/21/2024 18:35	6/21/2024 15:35	44.700853	-123.227144	24738	1.30%		Exceedance at hole in cover
A38	6/21/2024 18:42	6/21/2024 15:42	44.701694	-123.227427	1707	1%		Exceedance at hole in cover
A39	6/21/2024 18:44	6/21/2024 15:44	44.701818	-123.227413	14956	1.15%		Exceedance at 5H26
A40	6/21/2024 18:47	6/21/2024 15:47	44.701819	-123.2274	2675	1.15%	DSCN1737	Exceedance at hole in cover
A41	6/21/2024 18:51	6/21/2024 15:51	44.702381	-123.227485	1057	4000	DSCN1738	Exceedance at tag FD12

Attachment 2: EPA Surface Emission Monitoring Map

Legend

- EPA Readings >500ppm Metha
- Surface Emission Monitoring Pa

A41
A39
A38
A36
A37
A35
A34
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A20
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A4
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A31
A32

Republic Services Coffin Butte Landfill

Knife River - Coffin Butte Quarry

Valley Landfills

Coffin Butte Rd

Wiles Rd

ogle Earth

24 Airbus

Attachment 3: IRwin Calibration

AED IRWin SX 580-010 92006439

Date:	6/20/2024
Calibration Performed By:	Steve Rapp
Warm-Up Time:	Approx. 15 mins.
Detector Calibrated:	AED IRWin SX 580-010 92006439

Calibration Gas: Methane (CH4)				
Calibration Gas	**Calibration Gas Supplier**	**Calibration Gas Expiration**	**Lot #**	**Cylinder #:**
Zero gas (0 ppmv CH4)	Pine Environmental Services	6/29/2027	304-402786171-1	UN10021121719481
500 ppmv CH4	Pine Environmental Services	6/29/2027	304-402785850-1	UN19561121719481

Time	**Location of Calibration**		**Notes:**	
Approx. 10:45:00 AM	Coffin Butte landfill office building, Carvallis, OR.			
Initial Accuracy Test				
Expected Reading (ppmv CH4)	**Zero**	**500**	**Notes:**	Used demand regulators.
Span Reading	0	500	Accepted/pass	
Calibration/Concentration Check				
Expected Reading (ppmv CH4)	**Zero**	**500**		
Instrument Reading	0	500	Accepted/pass	
Bump Check Date: 6/21/2024 Time: 14:28				
Expected Reading (ppmv CH4)		**500**		
Instrument Reading		470	Accepted/pass	
Bump Check Date: 6/21/2024 Time: 16:10				
Expected Reading (ppmv CH4)		**500**		
Instrument Reading		460	Accepted/pass	

Background concentrations (ppmv CH4):			**Location:**	**Time:**
Upwind:	0		Measured on road by portable toilets in northeast corner of LF	16:00
Downwind:	0		Measured in parking lot of office building	11:00

Comments/Notes:

The instrument was calibrated and checked for response time and precision on 6/20/24 at approx. 7:30 am using the 0 air and 500 ppm CH4 from the same cylinders identified above.
All readings are within 10% of the known calibration value. Response times are approximately 7.1 seconds, under the maximum of 30 seconds.
The gas cylinders identified above were used for the daily calibration and bump checks.

Precision and Response Time Checks:

Date:	Time:		Location:
6/20/2024	7:25 AM		Residence Inn, Portland, OR

AED IRWin SX 580-010 92006439

	Cal Gas (zero) 0 ppmv		Notes:
	Reading	Time	Demand regulator used.
Trial 1	0		
Trial 2	0		
Trial 3	0		
Average	0		

AED IRWin SX 580-010 92006439

	Cal Gas (mid): 500 ppmv CH4		Notes:
	Reading	Time	Demand regulator used.
Trial 1	500	6.78	
Trial 2	500	6.92	
Trial 3	500	7.59	
Average	500	7.1	All readings within 10%.All times within 30 seconds.

Calibration gas information:

Gas Concentration (ppmv CH4)	Calibration Gas	Lot #	Cylinder #	Expiration Date	Notes:
0	Pine Environmental Services	304-402786171-1	UN10021121719481	6/29/2027	Pressure = 300 psi. THC < 0.1 ppm, O2 = 20-22%
500	Pine Environmental Services	304-402785850-1	UN19561121719481	6/29/2027	Pressure = 400 psi. 500 ppmv CH4. Air 20.9% O2 in N2.

Attachment 4: TVA 2020 Calibration

EPA Method 21 Quarterly Precision/Daily Calibration Form

Alyson Skeen +

US EPA, Region 10	**Monitor:** Sara Conley	**Date:** 6/21/24
Mfg: Thermo Fisher Scientific	**Model No:** TVA 2020	**Instrument SN:** 0020231270089
Facility: Coffin	City/State:	**ICIS No.**

Calibration Gas Information					
	Gas Type	**ppm**	**+/- %***	**Lot No:**	**Expiration Date: (M-D-Y)**
Calibration Gas 1	0-Air	0	2		
Calibration Gas 2	CH4	500	2		
Calibration Gas 3	CH4	10,000	2		

* % that gas is certified to be w/in of the std concentration. (Method-21, Cylinder gas to be certified within ± 2% of std.)

Calibration Standard Test No. 1: 0 **PPM** Zero Air Gas

Test	Test reading	Drift	Total	Avg.	------		Comments
1	0.1	0.1	0.2	0.1	NA		
2	0.0	0					
3	-0.1	+0.1					

Calibration Standard Test No. 2 500 **PPM** 500 **Gas**

Test	Test reading	Drift	Total	Avg.	*Avg diff w/in ± 10% std = Pass		Comments
1	499	1	7	2.3	0.5 %	(Pass) / Fail (circle one)	
2	497	3					
3	497	3					

Calibration Standard Test No. 3 10,000 **PPM** 9,000 **Gas**

Test	Reading	Drift	Total	Avg.	*Avg diff w/in ± 10% std = Pass		Comments
1	1.02	200	900	300	3 %	(Pass) / Fail (circle one)	
2	1.03	300					
3	1.04	400					

* Avg difference ÷ cal gas std x 100 = _____%, Unit warm up time ≥ 30 min: ☐ Yes, ☐ No

Subpart VVa Drift – Mid Day Reading				**Subpart VVa Drift – End of Day Reading**			
Cal Gas	Concentration	Reading	*Pass /Fail	Cal Gas	Concentration	Reading	*Pass / Fail
1	0	-0.4	P	1	0	-2.5	
2	500	513	P	2	500	504	
3	10,000	10,800	P	3	10,000	10400	

*Negative drift > 10% = Fail per 40 CFR 60, Subpart VVa. Fail = monitored data is void. Pass = ≤ 10% drift.

Response Time W/ extension ◯ W/O extension ◯

Test No.	Cal Std	Response Time	Total Time	Avg. Time	pass/fail ≤30 sec	Cal Std.	Response Time	Total Time	Avg. Time	pass/fail ≤30 sec
1										
2			____sec	____sec	Pass / Fail			____ sec.	____ sec.	Pass / Fail
3										

Notes: _____

Monitor's Signature _____ Date: 6/21/24

Attachment 5: SEM Repair tracking

PENETRATION ID	TIMESTAMP	LAT WGS84	LON WGS84	Action
A1	6/21/2024 12:11	44.69752	-123.233986	Damaged well repaired; new kanaflex, added dirt.
A2	6/21/2024 12:21	44.697938	-123.234216	EPDM patch
A3	6/21/2024 12:23	44.698045	-123.234395	EPDM patch
A4	6/21/2024 12:29	44.698033	-123.234661	EPDM patch
A5	6/21/2024 12:30	44.697969	-123.234744	EPDM patch
A6	6/21/2024 12:33	44.698005	-123.235072	EPDM patch
A7	6/21/2024 12:35	44.698088	-123.235163	EPDM patch
A8	6/21/2024 12:37	44.698123	-123.235294	Tarp removed for waste placement
A9	6/21/2024 12:40	44.698127	-123.235513	Tarp removed for waste placement
A10	6/21/2024 12:41	44.698197	-123.23546	Tarp removed for waste placement
A11	6/21/2024 12:42	44.698206	-123.23543	Tarp removed for waste placement
A12	6/21/2024 12:45	44.69817	-123.235601	Tarp removed for waste placement
A13	6/21/2024 12:48	44.698197	-123.235671	Tarp removed for waste placement
A14	6/21/2024 12:49	44.698184	-123.235675	Tarp removed for waste placement
A15	6/21/2024 12:51	44.698257	-123.235666	Tarp removed for waste placement
A16	6/21/2024 12:52	44.6983	-123.235524	Tarp removed for waste placement
A17	6/21/2024 12:57	44.698489	-123.235238	Tarp removed for waste placement
A18	6/21/2024 13:00	44.698836	-123.235078	Tarp removed for waste placement
A19	6/21/2024 13:02	44.698871	-123.23504	Tarp removed for waste placement
A20	6/21/2024 13:06	44.699096	-123.234886	Tarp removed for waste placement
A21	6/21/2024 13:09	44.699247	-123.235311	Tarp removed for waste placement
A22	6/21/2024 13:11	44.699114	-123.23529	Tarp removed for waste placement
A23	6/21/2024 13:13	44.698985	-123.235414	Tarp removed for waste placement
A24	6/21/2024 13:18	44.698458	-123.234777	Tarp removed for waste placement
A25	6/21/2024 13:21	44.698393	-123.234706	EPDM sheet added around and booted
A26	6/21/2024 13:23	44.698392	-123.234575	EPDM boot repaired.
A27	6/21/2024 13:25	44.698351	-123.234173	EPDM patch
A28	6/21/2024 13:28	44.698182	-123.23397	EPDM patch
A29	6/21/2024 13:31	44.698236	-123.233457	EPDM patch
A30	6/21/2024 13:33	44.698186	-123.233425	EPDM patch
A31	6/21/2024 13:48	44.696522	-123.233878	Bolts added/tightened lid on Cell 1 sump
A32	6/21/2024 15:49	44.6974	-123.224024	Blind flange bolts added and tightened
A33	6/21/2024 16:14	44.701817	-123.22582	Soil added
A34	6/21/2024 16:21	44.701431	-123.226183	EPDM patch
A35	6/21/2024 16:24	44.701263	-123.226236	EPDM patch
A36	6/21/2024 16:31	44.700978	-123.227052	EPDM patch
A37	6/21/2024 16:35	44.700853	-123.227144	EPDM patch
A38	6/21/2024 16:42	44.701694	-123.227427	EPDM patch
A39	6/21/2024 16:44	44.701818	-123.227413	EPDM patch
A40	6/21/2024 16:47	44.701819	-123.2274	EPDM patch
A41	6/21/2024 16:51	44.702381	-123.227485	EPDM patch
Please see 2nd Quarter SEM report for remonitoring				

PENETRATION ID	TIMESTAMP	LAT WGS84	LON WGS84	Action
A1	6/21/2024 12:11	44.69752	-123.233986	Damaged well repaired; new kanaflex, added dirt.
A2	6/21/2024 12:21	44.697938	-123.234216	EPDM patch
A3	6/21/2024 12:23	44.698045	-123.234395	EPDM patch
A4	6/21/2024 12:29	44.698033	-123.234661	EPDM patch
A5	6/21/2024 12:30	44.697969	-123.234744	EPDM patch
A6	6/21/2024 12:33	44.698005	-123.235072	EPDM patch
A7	6/21/2024 12:35	44.698088	-123.235163	EPDM patch
A8	6/21/2024 12:37	44.698123	-123.235294	Tarp removed for waste placement
A9	6/21/2024 12:40	44.698127	-123.235513	Tarp removed for waste placement
A10	6/21/2024 12:41	44.698197	-123.23546	Tarp removed for waste placement
A11	6/21/2024 12:42	44.698206	-123.23543	Tarp removed for waste placement
A12	6/21/2024 12:45	44.69817	-123.235601	Tarp removed for waste placement
A13	6/21/2024 12:48	44.698197	-123.235671	Tarp removed for waste placement
A14	6/21/2024 12:49	44.698184	-123.235675	Tarp removed for waste placement
A15	6/21/2024 12:51	44.698257	-123.235666	Tarp removed for waste placement
A16	6/21/2024 12:52	44.6983	-123.235524	Tarp removed for waste placement
A17	6/21/2024 12:57	44.698489	-123.235238	Tarp removed for waste placement
A18	6/21/2024 13:00	44.698836	-123.235078	Tarp removed for waste placement
A19	6/21/2024 13:02	44.698871	-123.23504	Tarp removed for waste placement
A20	6/21/2024 13:06	44.699096	-123.234886	Tarp removed for waste placement
A21	6/21/2024 13:09	44.699247	-123.235311	Tarp removed for waste placement
A22	6/21/2024 13:11	44.699114	-123.23529	Tarp removed for waste placement
A23	6/21/2024 13:13	44.698985	-123.235414	Tarp removed for waste placement
A24	6/21/2024 13:18	44.698458	-123.234777	Tarp removed for waste placement
A25	6/21/2024 13:21	44.698393	-123.234706	EPDM sheet added around and booted
A26	6/21/2024 13:23	44.698392	-123.234575	EPDM boot repaired.
A27	6/21/2024 13:25	44.698351	-123.234173	EPDM patch
A28	6/21/2024 13:28	44.698182	-123.23397	EPDM patch
A29	6/21/2024 13:31	44.698236	-123.233457	EPDM patch
A30	6/21/2024 13:33	44.698186	-123.233425	EPDM patch
A31	6/21/2024 13:48	44.696522	-123.233878	Bolts added/tightened lid on Cell 1 sump
A32	6/21/2024 15:49	44.6974	-123.224024	Blind flange bolts added and tightened
A33	6/21/2024 16:14	44.701817	-123.22582	Soil added
A34	6/21/2024 16:21	44.701431	-123.226183	EPDM patch
A35	6/21/2024 16:24	44.701263	-123.226236	EPDM patch
A36	6/21/2024 16:31	44.700978	-123.227052	EPDM patch
A37	6/21/2024 16:35	44.700853	-123.227144	EPDM patch
A38	6/21/2024 16:42	44.701694	-123.227427	EPDM patch
A39	6/21/2024 16:44	44.701818	-123.227413	EPDM patch
A40	6/21/2024 16:47	44.701819	-123.2274	EPDM patch
A41	6/21/2024 16:51	44.702381	-123.227485	EPDM patch
Please see 2nd Quarter SEM report for remonitoring				

Legend

- EPA Readings >500ppm Metha
- Surface Emission Monitoring Pa

A41
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Republic Services Coffin Butte Landfill

Knife River - Coffin Butte Quarry

Valley Landfills

Coffin Butte Rd

Wiles Rd

ogle Earth

24 Airbus

EPA Method 21 Quarterly Precision/Daily Calibration Form

Alyson Skeen +

US EPA, Region 10	**Monitor:** Sara Conley	**Date:** 6/21/24
Mfg: Thermo Fisher Scientific	**Model No:** TVA 2020	**Instrument SN:** 0020231270089
Facility: Coffin	City/State:	**ICIS No.**

Calibration Gas Information					
	Gas Type	**ppm**	**+/- %***	**Lot No:**	**Expiration Date: (M-D-Y)**
Calibration Gas 1	0-Air	0	2		
Calibration Gas 2	CH4	500	2		
Calibration Gas 3	CH4	10,000	2		

* % that gas is certified to be w/in of the std concentration. (Method-21, Cylinder gas to be certified within ± 2% of std.)

Calibration Standard Test No. 1: 0 **PPM** Zero Air Gas

Test	Test reading	Drift	Total	Avg.	------		Comments
1	0.1	0.1	0.2	0.1	NA		
2	0.0	0					
3	-0.1	+0.1					

Calibration Standard Test No. 2 500 **PPM** 500 **Gas**

Test	Test reading	Drift	Total	Avg.	*Avg diff w/in ± 10% std = Pass		Comments
1	499	1	7	2.3	0.5 %	(Pass) / Fail (circle one)	
2	497	3					
3	497	3					

Calibration Standard Test No. 3 10,000 **PPM** 9,000 **Gas**

Test	Reading	Drift	Total	Avg.	*Avg diff w/in ± 10% std = Pass		Comments
1	1.02	200	900	300	3 %	(Pass) / Fail (circle one)	
2	1.03	300					
3	1.04	400					

* Avg difference ÷ cal gas std x 100 = _____%, Unit warm up time ≥ 30 min: ☐ Yes, ☐ No

Subpart VVa Drift – Mid Day Reading				**Subpart VVa Drift – End of Day Reading**			
Cal Gas	Concentration	Reading	*Pass /Fail	Cal Gas	Concentration	Reading	*Pass / Fail
1	0	-0.4	P	1	0	-2.5	
2	500	513	P	2	500	504	
3	10,000	10,800	P	3	10,000	10400	

*Negative drift > 10% = Fail per 40 CFR 60, Subpart VVa. Fail = monitored data is void. Pass = ≤ 10% drift.

Response Time W/ extension ◯ W/O extension ◯

Test No.	Cal Std	Response Time	Total Time	Avg. Time	pass/fail ≤30 sec	Cal Std.	Response Time	Total Time	Avg. Time	pass/fail ≤30 sec
1										
2			____sec	____sec	Pass / Fail			____ sec.	____ sec.	Pass / Fail
3										

Notes: _____

Monitor's Signature _____ Date: 6/21/24

Attachment 1 – EPA Inspection Photo, Video and SEM Log
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A1	6/21/2024 14:11	6/21/2024 11:11	44.69752	-123.233986	4900	1000	P6210151, P6210152	Exceedance at well
--							P6210153	Photo showing the side of the landfill looking east.
--							P6210154	Photo of a well with cover gathered around the base
A2	6/21/2024 14:21	6/21/2024 11:21	44.697938	-123.234216	10011	3%	n/a	
A3	6/21/2024 14:23	6/21/2024 11:23	44.698045	-123.234395	1271	3700	n/a	
A4	6/21/2024 14:29	6/21/2024 11:29	44.698033	-123.234661	1622	1000	P6210155, P6210156	Exceedance measured at base of well
A5	6/21/2024 14:30	6/21/2024 11:30	44.697969	-123.234744	1459	1600	P6210157	Exceedance at opening in cover
							P6210158	Penetration in cover
A6	6/21/2024 14:33	6/21/2024 11:33	44.698005	-123.235072	14097	>1000	P6210159, P6210160, P6210161	Exceedance located at support on left
A7	6/21/2024 14:35	6/21/2024 11:35	44.698088	-123.235163	16501	20000	P6210163	Exceedance at tear in cover
A8	6/21/2024 14:37	6/21/2024 11:37	44.698123	-123.235294	1118	800	P6210164	Exceedance at vegetation growing out of cover
A9	6/21/2024 14:40	6/21/2024 11:40	44.698127	-123.235513	2719	1.30%	P6210165	Exceedance at tear in cover
A10	6/21/2024 14:41	6/21/2024 11:41	44.698197	-123.23546	4762	1.00%	P6210166, P6210167	Exceedance at tear in cover, at worn patch
A11	6/21/2024 14:42	6/21/2024 11:42	44.698206	-123.23543	8350	20000	P6210167	Exceedance at tear in cover at a rock in background of 167

Attachment 1 – EPA Inspection Photo, Video and SEM Log
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A12	6/21/2024 14:45:00	6/21/2024 11:45	44.69817	-123.235601	1597	2300	camera battery died	
A13	6/21/2024 14:48	6/21/2024 11:48	44.698197	-123.235671	1839	1000		Exceedance at tear in cover
A14	6/21/2024 14:49	6/21/2024 11:49	44.698184	-123.235675	1182	2000		Exceedance at tear in cover
A15	6/21/2024 14:51	6/21/2024 11:51	44.698257	-123.235666	4253	4255		Exceedance at patched area with new hole in cover
A16	6/21/2024 14:52	6/21/2024 11:52	44.6983	-123.235524	9694	TVA flame out		flame out is generally when > 20000
A17	6/21/2024 14:57	6/21/2024 11:57	44.698489	-123.235238	2967	not taken		Exceedance at tarp hole
A18	6/21/2024 15:00	6/21/2024 12:00	44.698836	-123.235078	2900	2200		Exceedance at wellhead cluster
A19	6/21/2024 15:02	6/21/2024 12:02	44.698871	-123.23504	4436	1300		Exceedance at flange
A20	6/21/2024 15:06	6/21/2024 12:06	44.699096	-123.234886	118265	TVA flame out		The cap is off of this well, exceedance at the top.
A21	6/21/2024 15:09	6/21/2024 12:09	44.699247	-123.235311	51151	13000		
A22	6/21/2024 15:11	6/21/2024 12:11	44.699114	-123.23529	1412	1200		
A23	6/21/2024 15:13	6/21/2024 12:13	44.698985	-123.235414	8110	1100		
A24	6/21/2024 15:18	6/21/2024 12:18	44.698458	-123.234777	7443	1200		Exceedance at penetration
A25	6/21/2024 15:21	6/21/2024 12:21	44.698393	-123.234706	8054	12000		Exceedance at BV92
A26	6/21/2024 15:23	6/21/2024 12:23	44.698392	-123.234575	4502	4600		Exceedance at hole in tarp
A27	6/21/2024 15:25	6/21/2024 12:25	44.698351	-123.234173	12969	1.30%		Exceedance at3V93
A28	6/21/2024 15:28	6/21/2024 12:28	44.698182	-123.23397	4339	2400		Exceedance at hole in tarp, 3V83
A29	6/21/2024 15:31	6/21/2024 12:31	44.698236	-123.233457	55729	>2%		Exceedance at tear at boot where horizontal pipe is coming out of the cover
A30	6/21/2024 15:33	6/21/2024 12:33	44.698186	-123.233425	2368	1800		Exceedance at liquid separation
A31	6/21/2024 15:48	6/21/2024 12:48	44.696522	-123.233878	16740	1.50%		Exceedance at Cell 1 sump, outside of the landfill footprint.
--							FLIR0091	Accidental video
--							FLIR0092	Accidental video

Attachment 1 – EPA Inspection Photo, Video and SEM Log
Valley Landfills Inc CAA Inspection 06/21/2024

PENETRATION ID	TIMESTAMP (EST)	Corrected time (Pacific time)	LAT WGS84	LON WGS84	MAX DETECTOR CONCENTRATION CH4 (ppmv)	CONFIRMATION TVA 2020 (EPA)CH4 (ppmv)	PHOTO OR VIDEO NUMBER	DESCRIPTION
A32	6/21/2024 17:49	6/21/2024 14:49	44.6974	-123.224024	7700	not taken	FLIR0093	Exceedance at Flare Station flange, in video the flange on the right side
--							FLIR0094	Accidental video
--							FLIR0095	Accidental video
A33	6/21/2024 18:14	6/21/2024 15:14	44.701817	-123.22582	6393	2000+	DSCN1734	Exceedance at liquid separation for horizontal
A34	6/21/2024 18:21	6/21/2024 15:21	44.701431	-123.226183	7110	1200	DSCN1735	Exceedance at tear in the material at the base of 5V22
A35	6/21/2024 18:24	6/21/2024 15:24	44.701263	-123.226236	12247	1.30%		
A36	6/21/2024 18:31	6/21/2024 15:31	44.700978	-123.227052	654	10000	DSCN1736	
A37	6/21/2024 18:35	6/21/2024 15:35	44.700853	-123.227144	24738	1.30%		Exceedance at hole in cover
A38	6/21/2024 18:42	6/21/2024 15:42	44.701694	-123.227427	1707	1%		Exceedance at hole in cover
A39	6/21/2024 18:44	6/21/2024 15:44	44.701818	-123.227413	14956	1.15%		Exceedance at 5H26
A40	6/21/2024 18:47	6/21/2024 15:47	44.701819	-123.2274	2675	1.15%	DSCN1737	Exceedance at hole in cover
A41	6/21/2024 18:51	6/21/2024 15:51	44.702381	-123.227485	1057	4000	DSCN1738	Exceedance at tag FD12

Legend

- EPA Readings >500ppm Metha
- Surface Emission Monitoring Pa

A41
A39
A38
A36
A37
A35
A34
A33
A21
A22
A19
A20
A18
A25
A27
A29
A30
A15
A7
A4
A2
A28
A1
A31
A32

Republic Services Coffin Butte Landfill

Knife River - Coffin Butte Quarry

Valley Landfills

Coffin Butte Rd

Wiles Rd

ogle Earth

24 Airbus

REGION 10
SEATTLE, WA 98101

RETURN RECEIPT REQUESTED

Ian Macnab
Environmental Manager
Republic Services, Inc.
28972 Coffin Butte Road
Corvallis, Oregon 97330

Re: INFORMATION REQUEST Regarding Coffin Butte Landfill, Corvallis, Oregon

Dear Ian Macnab:

The U.S. Environmental Protection Agency (EPA), Region 10 seeks information concerning the Coffin Butte Landfill owned or operated by Valley Landfills Inc., a wholly-owned subsidiary of Republic Services, at 2917 Coffin Butte Road in Corvallis, Oregon. The enclosed Information Request is issued to Valley Landfills Inc. pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414.

Under CAA Section 114, 42 U.S.C. § 7414, EPA is authorized to require the submission of records, reports and other information for the purpose of determining whether any violations of the CAA have occurred and for other purposes of the CAA. Valley Landfills Inc. is required to provide information and documents in accordance with the enclosed Information Request within **60 days** of your receipt of the request. If you anticipate being unable to fully respond to this Information Request by the specified date, you may request an extension within **10 days** of receipt of this request. Include a justification for your extension request. If timely submitted, EPA will consider your request and may extend the deadline.

Submit your response to this Information Request or request for extension to:

Sara Conley
Conley.sara@epa.gov
Air Enforcement Officer
Air Enforcement Section, Enforcement and Compliance Division, EPA Region 10

Please ensure the enclosed Statement of Certification is signed by a duly-authorized officer or agent of Valley Landfills Inc. and returned with the response to this Information Request.

Failure to timely respond fully and truthfully to this Information Request may subject you to civil penalties pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. Your response to this Information Request may be used by EPA in administrative, civil or criminal proceedings.

Thank you for your cooperation. If you have any questions regarding this Information Request or wish to request an extension, please contact Sara Conley, at (206) 553-6914 or conley.sara@epa.gov. For legal matters or questions from legal counsel, please contact Brandon Jones-Cobb, in the Office of Regional Counsel, at (206) 553-6917 or jonescobb.brandon@epa.gov.

Sincerely,

Morgan Jencius, Manager
Air and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosures
1. Information Request
2. Statement of Certification

cc: Registered Agent – Valley Landfills Inc.
CT Corporation System

Becka Puskas, J.D.
Interim Manager, Office of Compliance and Enforcement
Oregon Department of Environmental Quality

Approved OMB 2020-0003
Approval expires 09/30/2027

ENCLOSURE 3
SUBSTANTIATION OF
CONFIDENTIAL BUSINESS INFORMATION CLAIM

Republic Services, Valley Landfills Inc.

EPA is providing you notice that if you assert a claim of business confidentiality for information you provide in response to this Information Request, EPA will determine whether such information is entitled to confidential treatment, pursuant to 40 C.F.R. Part 2, subpart B, including 40 C.F.R. §§ 2.208 and 2.301. If you feel that some or all of the information is entitled to confidential treatment, you must make the showings below with specific reference to those portions of the information you consider confidential.

Please be specific by page (including Bates Stamp, if applicable), paragraph, and sentence when identifying and substantiating the information subject to your claim. Where your claim, as originally made or as modified by your response to this letter, does not include all information on a page, please attach a copy of each such page with brackets around the text that you claim to be CBI. Please note that if a page, document, group, or class of documents claimed by you to be CBI contains a significant amount of information which the EPA Region 10, Office of Regional Counsel determines is not CBI, your CBI claim regarding that page, document, group, or class of documents may be denied. Any information not specifically identified as subject to a confidentiality claim and substantiated as such in your response to this letter may be disclosed to the requester without further notice to you.

In making its final confidentiality determination, the EPA will consider the relevant substantive criteria in its CBI regulations, under 40 C.F.R. § 2.208(a)-(d), as well as the U.S. Supreme Court's decision in Food Marketing Institute v. Argus Leader Media (Argus), 139 S. Ct. 2356 (2019), which evaluated the definition of "confidential" as used in Exemption 4. In the Argus decision, the Court held that at least where "[1] commercial or financial information is both customarily and actually treated as private by its owner and [2] provided to the government under an assurance of privacy, the information is 'confidential' within the meaning of Exemption 4." Argus, 139 S. Ct. at 2366.

For each item or class of information that you continue to claim as CBI, please answer the following questions, giving as much detail as possible. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to be entitled to confidential treatment:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

3. Has EPA, another federal agency, or court made any determination as to the confidentiality of the information? If so, please attach a copy of the determination.

4. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?

4. Is the information contained in any publicly available material such as patents or patent applications, publicly available databases (including state databases), promotional publications, annual reports, or articles?

   If you answered "yes," please identify the publicly available information and its location (e.g., patent number or website address).

5. Has your company taken reasonable measures to protect the information claimed as CBI? If so, please identify the measure or internal controls your business has taken to protect the information claimed as confidential:

   a. Non-disclosure agreement required prior to access. Yes/No
   b. Access is limited to individuals with a need-to-know. Yes/No
   c. Information is physically secured (e.g. locked in a room or cabinet) or electronically secured (encrypted, password protected, etc.). Yes/No
   d. Other internal control measures(s). Yes/No. (*If yes, please explain*.)

6. Does your company customarily keep the information private or closely-held? If so, please explain the basis for your response.

7. At the time you submitted the information you claimed as CBI, did EPA provide any express or implied assurance of confidentiality? If so, please explain the specific assurance(s) you received. For example, expressed assurances indicating that information will not be publicly disclosed could include legal authorities (regulation or statute), direct communications, class determinations, etc. Examples of implicit assurances could include a description of the specific context in which the information was received.

8. Did the Agency provide any expressed or implied indications at the time the information was submitted that EPA would publicly disclose the information?

9. If you believe any submitted information to be a trade secret, please state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be a trade secret.

10. Are there any means by which a member of the public could obtain access to the information or readily discover the information claimed as confidential through reverse engineering?

11. Please explain why the information claimed as confidential is not emissions data under the Clean Air Act.

12. Explain any other issue or additional information you deem relevant to EPA's determination.

Please note that *you bear the burden of substantiating your confidentiality and trade secret claim(s).* Generalized or conclusory statements will be given little or no weight in EPA's determination on the confidentiality of the information you claim to be CBI.

Your comments must be postmarked or hand delivered to this office, or emailed to Sara Conley conley.sara@epa.gov, by the 30th day after receipt of this letter. You may seek an extension of time to submit your comments to this office, but the request must be made before the 30th day after receipt of this letter. Except in extraordinary circumstances, no extension will be approved. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information.

If you wish to claim any information that you provide in your response to this letter to itself be confidential, you must mark the response "**CONFIDENTIAL**" or with a similar designation, and must bracket all text in the response that you so claim. Information so designated will be disclosed by the EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information provided in your response as confidential, it may be made available to the public.

ENCLOSURE 1
CAA INFORMATION REQUEST

Republic Services, Valley Landfills Inc.

A. INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question in this Information Request. Mark each answer with the number of the question (and subpart, if applicable) to which it corresponds.

2. For each question, provide a copy of each document relied on or referred to in the preparation of the response or that contains information responsive to the question.

3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.

4. Provide the name, title, and business contact information for each person who prepared or was consulted in the preparation of your response. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained in this Information Request, or who may be able to provide additional responsive documents, provide the name, title, and business contact information for each such person and the additional information or documents that they may have.

5. If you believe a question is not applicable to the Facility, explain the reason for that belief.

6. The information requested must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may assert a confidentiality claim covering part or all of the information submitted, pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414 and 40 C.F.R. Part 2, by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA.

   Information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. See 40 C.F.R. § 2.301 for additional rules governing certain information obtained under the CAA. Note that certain categories of information, including "emission data," are not entitled to confidential treatment. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. See also 41 Fed. Reg. 36902 (Sept. 1, 1976).

   If you claim all or part of your response as a trade secret, proprietary, or company confidential, please also return with your response a complete substantiation of your claim. Enclosure 3 contains the information you must provide in order to substantiate your claim. If you require additional time to substantiate your confidentiality claim, contact the individuals listed in the cover letter.

B. DEFINITIONS

All terms used in this Information Request have their ordinary meaning unless such terms are defined in this Information Request; or 302 of the CAA , 42 U.S.C. §§ 7401 or 7602; or 40 C.F.R. Part 63, Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. For purposes of this Information Request:

1. The terms "you" or "Respondent" mean Republic Services, Coffin Butte Landfill, Valley landfills Inc., and its subsidiaries, officers, directors, managers, partners, employees, contractors, and agents, as applicable.
2. "Abandoned" means, when used in reference to a component of the gas collection system, a component that is no longer operating.
3. "Document" means any object that records, stores, or presents information, and includes, without limitation, email, writings, memoranda, contracts, agreements, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. Include all attachments to or enclosures with any responsive document.
4. "Facility" means the municipal solid waste landfill owned or operated by Respondent located at Highway 99 & Coffin Butte Road Corvallis, OR 97330.
5. "Gas Collectors" means vertical wells, horizontal collectors, or other collection devices capable of collecting and extracting gas at the landfill and meets the requirements of 40 C.F.R § 63.1962 and parallel provisions under the other EPA Landfill Air Regulations.
6. "Gas collection system" means the active or passive system of wells or similar collection components used to collect and move gas at the landfill.
7. "Gas Collection and Control System" or "GCCS" means an active or passive system of wells or similar collection components to move gas at the landfills to associated control devices per the requirements at 40 C.F.R. § 63.1959(b)(ii) and parallel provisions under the other EPA Landfill Air Regulations.
8. "Gas Collection and Control System Design Plan" or "Design Plan," means a plan that is developed by the landfill and meets the requirements of 40 C.F.R. § 63.1981(d) and parallel provisions under the other EPA Landfill Air Regulations.
9. "Gas Control System" means the systems that treat and/or destroy landfill gases collected by the gas collection system, including but not limited to flares, gas to energy projects, and renewable natural gas plants, as well as any other control devices and treatment systems used to fulfill the control requirements of 40 C.F.R. § 63.1959(b)(2)(iii) and parallel provisions under the other EPA Landfill Air Regulations.
10. "Landfill" means the municipal solid waste (MSW) landfill operated by Republic Services, Coffin Butte Landfill, or Valley Landfills Inc..
11. "Landfill Air Regulations" refers to 40 C.F.R. Part 60, Subpart WWW; 40 C.F.R. Part 60, Subpart XXX; 40 C.F.R. Part 62, Subpart OOO; 40 C.F.R. Part 62, Subpart GGG; 40 C.F.R. Part 63, Subpart AAAA; and State Plans for the Control of Emissions from Existing Municipal Solid Waste Landfills incorporated under 40 C.F.R. Part 62 pursuant to 40 C.F.R. Part 60, Subpart Cf or Cc, as applicable.

12. "LandGEM" means EPA's Landfill Gas Emissions Model, which is an automated estimation tool with a Microsoft Excel interface that can be used to estimate emissions for total landfill gas, methane, carbon dioxide, nonmethane organic compounds, and individual air pollutants from municipal solid waste landfills.
13. "Leachate" means liquids, including landfill gas condensate inside the landfill.
14. "Owner or Operator" means any Person who owns, leases, operates, controls, or supervises the Facility.
15. "Person" or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country), or any other entity, and includes Republic Services, Coffin Butte Landfill, and Valley Landfills Inc.
16. "Surface Emission Monitoring or SEM" means monitoring surface concentrations of methane at collection areas of a landfill, as required by 40 C.F.R. §§ 63.1960(c)&(d) and parallel provisions under the other EPA Landfill Air Regulations.
17. "You and/or Your" means Republic Services, Coffin Butte Landfill, Valley Landfills Inc. and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors, and others who are in possession, custody, or control (actual or constructive) of relevant information that is otherwise available to You or may have obtained information for or on Your behalf.

C. INFORMATION REQUEST

Provide the following information for the Facility. Unless otherwise specified, provide all responsive information for the time period between January 1, 2022 and the date of this Request.

General Applicability:

1. Provide the name and address of the legal owner of the Facility. If the owner and operator of the Facility are not the same entity, provide the name and address of the operator of the Facility and provide contracts/legal documents between entities as they relate to ownership, purchase or buy-back agreements and contract operation.

2. Provide copies of any submitted initial or amended design capacity reports.

(*As referenced in* 40 C.F.R. §§ 63.1981, 63.1983(a) and parallel provisions under EPA's Landfill Air Regulations).

Permits and Applications/Alternatives/Variances/Previous Enforcement:

3. Provide copies of the following documents for the Facility:
    a. All permit(s) in effect as of the date of this Request and the permit application(s) You submitted to obtain each such permit;
    b. Permit application(s) pending as of the date you received this Request; and

c. The original construction permit(s) and permit application(s). If an original construction permit has been modified, provide the current version of the construction permit.

4. Provide a copy of the following:
   a. All applicability determination or regulatory interpretation requests to and responses from the Oregon Department of Environmental Quality or EPA;
   b. All approvals of alternatives to Landfill Air Regulation requirements issued by Oregon Department of Environmental Quality or EPA; and
   c. Alternative compliance timeline requests to and responses from the Oregon Department of Environmental Quality or EPA.

5. Provide information regarding citizen complaints that the Landfill has knowledge of between January 1, 2022, and the date of this request. The information should include:
   a. Date and time;
   b. Location at or near the Landfill which is the subject of the complaint;
   c. Copy or description of complaint;
   d. Corrective action or monitoring done as a result; and
   e. Name and contact information for the person who submitted the complaint.

Semi-annual/Annual Reports:

6. Provide the semi-annual and annual reports between January 1, 2022 and the date of this request in an electronic format such as a searchable PDF.

(*As referenced in* 40 C.F.R. §§ 63.1959(a)-(b), 63.1981(h) and parallel provisions under EPA's Landfill Air Regulations).

Waste Type and Quantity Data:

7. Provide the monthly quantity (short tons or megagrams, labeled) of waste accepted at the Landfill between January 1, 2022 and the date of this request, including:
   a. A breakdown by type of waste (e.g., municipal solid waste, construction and demolition, asbestos, sludge, etc.);
   b. List the types and quantities of waste that were excluded from the maximum expected gas generation calculation and the rationale for excluding those types of waste; and
   c. List the types and quantities of waste that are classified as "inert" in facility reports for the Greenhouse Gas Reporting Program pursuant to 40 C.F.R. § 98.346(c).

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(*As referenced in* 40 C.F.R. §§ 63.1983(a), (d) and parallel provisions under EPA's Landfill Air Regulations).

Gas Collection and Control System (GCCS) Design:

8. Provide a copy of the following documents related to the Design Plan:
    a. Design Plans in effect at the Landfill since January 1, 2022.
    b. Copies of EPA or Oregon Department of Environmental Quality approval, disapproval, or other response to the two most recent Design Plans. If EPA or Oregon Department of Environmental Quality did not provide an approval, disapproval, or other response, provide a statement that EPA or Oregon Department of Environmental Quality approval did not approve, disapprove, or otherwise respond to Valley Landfill Inc's submission of the Design Plan(s).
    c. Identification of, and an explanation for, areas excluded from gas collection;
    d. A description of the design of the main gas header, including:
        i. Maximum rated flow rate capacity;
        ii. Maximum operating flow rate; and
        iii. Maximum allowable pressure drop.
    e. As-built, final design documents for each flare/blower system. The design documents shall include but not be limited to the following (for each piece of equipment):
        i. The manufacturers' expected/design life (years);
        ii. Minimum and maximum design flare temperatures (^{o}F);
        iii. The rated maximum flow rate capacity of the flare (standard cubic feet per minute, scfm); and
        iv. The blower(s) and backup blower(s) rated maximum flow rate at inlet vacuum.
    f. Most recent maximum expected gas flow rate calculations, if different from the Design Plan.
        i. Include the annual or monthly waste breakdown for every year used in the maximum expected gas flow rate calculations.
        ii. If LandGEM is used, provide a spreadsheet containing the most recent LandGEM calculation.
        iii. If LandGEM is not used, provide documentation of the method used to calculate the maximum expected gas flow rate.
        iv. Include scale house data of waste excluded from LandGEM calculations.

(*As referenced in* 40 C.F.R. § 63.1981 and parallel provisions under EPA's Landfill Air Regulations).

9. Provide report(s) for gas collection and control system stack test(s) and performance test(s), including initial tests , as well as other compliance testing, engineering testing, and testing for general information.

(*As referenced in* 40 C.F.R. § 63.1983(b) and parallel provisions under EPA's Landfill Air Regulations).

Gas Collection System:

10. Provide the following information for the gas collection system:
    a. List of existing and historical Gas Collectors/wellheads and leachate collectors, which are or were connected to the gas collection and control system;
    b. For each existing or historical Gas Collector/wellhead or leachate collector that is not in active service collecting landfill gas as of the date of this Request, provide the date on which the Gas Collector/wellhead r was taken out of active service and describe the status of the Gas Collector/wellhead, including whether the valve is open or closed, whether the Gas

Collector/wellhead is connected to the GCCS, whether the header lateral has been capped, and whether the Gas Collector/wellhead has been abandoned. Provide documents explaining the basis for each Gas Collector/wellhead abandonment, as well as any approvals issued by EPA or the Oregon Department of Environmental Quality for abandoning the Gas Collector/wellhead;

c. Indicate whether a Gas Collector is a vertical or horizontal Gas Collector;
d. Indicate the location of each Gas Collector, both by cell and by GPS coordinates;
e. Indicate whether each existing Gas Collector has a pump for leachate/water removal;
f. Indicate higher operating value or alternative operating procedure for Gas Collector;
g. Installation dates for Gas Collector/wellhead installed between January 1, 2022 and the date of this request; and
h. From January 1, 2022 to the date of this request, evaluations or analyses, conducted either by you or an external consultant/company, of the gas collection system, including any evaluation or analysis related to:
    i. Gas Collector placement;
    ii. Gas Collector depth;
    iii. Gas Collector density; and
    iv. Amount of vacuum applied to the Gas Collector/wellhead.

(*As referenced in* 40 C.F.R. §§ 63.1957-62, 63.1981(d)-(e) and parallel provisions under EPA's Landfill Air Regulations).

11. Provide the current topographic site map(s) displaying the following information:
    a. Gas Collector/wellhead locations and identifiers, including gas laterals and gas headers; and
    b. Areas in which gas collection is not occurring.

(*As referenced in* 40 C.F.R. § 63.1958(d) and parallel provisions under EPA's Landfill Air Regulations)

Wellhead Monitoring Data:

12. In an unlocked, Excel-compatible electronic spreadsheet format, provide GCCS monitoring records, including dates, times between January 1, 2022 and the date of this request, including the following:
    a. Monthly GCCS Gas Collector/wellhead measurements, including:
        i. Methane;
        ii. Carbon dioxide (CO_2);
        iii. Carbon monoxide (CO);
        iv. Flow rate;
        v. Oxygen;
        vi. Nitrogen;
        vii. Pressure;
        viii. Temperature; and
        ix. Notes taken by the technician during monitoring, corrective actions, and re-monitoring measurements.
    b. Monitoring data for each blower, including vacuum;

c. Gas Collector/wellhead parameter exceedances and corrective actions, including enhanced monitoring due to elevated temperatures, and corrective actions;
d. Gas Collector/wellhead higher operating values approvals relevant from January 1, 2022 and the date of this request, along with approvals of alternative timelines or corrections in that time; and
e. A list of Gas Collectors/wellheads not monitored during monthly monitoring and the explanation for exclusion.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(*As referenced in* 40 C.F.R. §§ 63.1958(b)-(c), 63.1961, 63.1962, 63.1981, 63.1983, and parallel provisions under EPA's Landfill Air Regulations)

Depth-to-Water and Depth of Perforation Data:

13. In an unlocked, Excel-compatible spreadsheet(s), provide the following information related to each vertical Gas Collector available between January 1, 2022 and the date of this request:
    a. Records of measurements of depth to water and/or height of water taken between January 1, 2022 and the date of this Request;
    b. Documentation of pinches and other obstructions;
    c. Depth to bottom of the vertical Gas Collector;
    d. Length of perforated pipe;
    e. Percentage of perforation; and
    f. A description of corrective actions taken by the facility as a result of the water level measurements or observation of obstructions, as applicable.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(*As referenced in* 40 C.F.R. § 63.1962(b)(2), and parallel provisions under EPA's Landfill Air Regulations)

14. Provide a description of standard operating procedures or internal guidelines relating to Gas Collector obstruction and/or dewatering at the Facility.

GCCS Main Header Data:

15. In an unlocked, Excel-compatible spreadsheet, provide the following landfill gas collection system main header data on an hourly basis from January 1, 2022 and the date of this request:
    a. Date and hour;
    b. Average system pressure (inches of water column, in. w.c.);
    c. Average gas flow rate collected (standard cubic feet per minute, scfm);
    d. Average landfill gas temperature (degree Fahrenheit, ^{o}F); and
    e. Average methane concentration.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(*As referenced in* 40 C.F.R. § 63.1961(a), and parallel provisions under EPA's Landfill Air Regulations)

16. Provide gas sampling reports between January 1, 2022 and the date of this request. Your response should include, but not be limited to, sampling done for:
    a. Methane concentration;
    b. Sulfur compounds; and
    c. Hazardous air pollutant (HAP) content.

Gas Control System:

General:

17. Provide monthly inspection, maintenance, and repair logs and records for each piece of control equipment (e.g., blower/flare system) between January 1, 2022 and the date of this request.

(*As referenced in* 40 C.F.R. § 63.1983(c)(7), and parallel provisions under EPA's Landfill Air Regulations)

18. In an unlocked, Excel-compatible spreadsheet, provide the following monitoring data for each flare between January 1, 2022 and the date of this request:
    a. Temperature readings;
    b. Gas flow readings;
    c. Methane percentages at each flare;
    d. Operating hours on a monthly basis for each flare;
    e. Records of bypass incidents at each flare; and
    f. Monthly SO_2 emissions calculations (tons/month, tons/year) for each flare system with supporting calculations.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(*As referenced in* 40 C.F.R. § 63.1961(b)-(c), and parallel provisions under EPA's Landfill Air Regulations)

Surface Emissions Monitoring (SEM):

19. Provide SEM records since January 1, 2022. Please make sure units of measurement are clearly indicated. For each monitoring event, include:
    a. Date(s) and description(s) of the monitoring activity, including identification of the device used;
    b. SEM data, including but not limited to instrument calibration data, methane concentration at the location of each monitored exceedance marked according to 40 C.F.R. § 63.1960(c)(4)(i), any other recorded methane concentrations, raw instrument data outputs, methane concentration upon re-monitoring at the location of each monitored exceedance; and

c. Records or descriptions (if the facility does not maintain records) of corrective actions performed in response to each monitored exceedance;

20. GPS coordinates, notes, drawings, maps or other records of the actual path traversed by the SEM technician for each quarterly SEM event since January 1, 2022, depicting:
    a. The monitoring route traveled and any deviations from the 30-meter intervals; and
    b. Areas excluded from surface emission monitoring (SEM) or exempt from quarterly SEM, including explanation(s) for each area excluded or exempted.

Please provide underlying documentation or statements from which you compiled the information in the spreadsheet.

(*As referenced in* 40 C.F.R. § 63.1961(f), and parallel provisions under EPA's Landfill Air Regulations)

21. Records or reports of additional emissions monitoring activities conducted at the direction of the Facility, including but not limited to drone, satellite, and tower-based monitoring, between January 1, 2022 and the date of this request.

Gas Migration:

22. Provide gas measurements at the gas monitoring probes between January 1, 2022 and the date of this request.
23. Provide records of corrective actions taken and remediation plans made in response to methane measurements taken at the gas monitoring probes.
24. Provide a map of the gas monitoring probe locations.

(*As referenced in* 40 C.F.R. §§ 63.1960(c), 63.1961(f), and parallel provisions under EPA's Landfill Air Regulations)

ENCLOSURE 2
STATEMENT OF CERTIFICATION

Republic Services, Inc.
28972 Coffin Butte Road
Corvallis, Oregon 97330

INFORMATION REQUEST
STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to Republic Services, Inc. are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Republic Services, Inc. under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

_____
Signature

_____
Printed Name

_____
Title

_____
Date

AED IRWin SX 580-010 92006439

Date:	6/20/2024
Calibration Performed By:	Steve Rapp
Warm-Up Time:	Approx. 15 mins.
Detector Calibrated:	AED IRWin SX 580-010 92006439

Calibration Gas: Methane (CH4)				
Calibration Gas	**Calibration Gas Supplier**	**Calibration Gas Expiration**	**Lot #**	**Cylinder #:**
Zero gas (0 ppmv CH4)	Pine Environmental Services	6/29/2027	304-402786171-1	UN10021121719481
500 ppmv CH4	Pine Environmental Services	6/29/2027	304-402785850-1	UN19561121719481

Time	**Location of Calibration**		**Notes:**	
Approx. 10:45:00 AM	Coffin Butte landfill office building, Carvallis, OR.			
Initial Accuracy Test				
Expected Reading (ppmv CH4)	**Zero**	**500**	**Notes:**	Used demand regulators.
Span Reading	0	500	Accepted/pass	
Calibration/Concentration Check				
Expected Reading (ppmv CH4)	**Zero**	**500**		
Instrument Reading	0	500	Accepted/pass	
Bump Check Date: 6/21/2024 Time: 14:28				
Expected Reading (ppmv CH4)		**500**		
Instrument Reading		470	Accepted/pass	
Bump Check Date: 6/21/2024 Time: 16:10				
Expected Reading (ppmv CH4)		**500**		
Instrument Reading		460	Accepted/pass	

Background concentrations (ppmv CH4):			**Location:**	**Time:**
Upwind:	0		Measured on road by portable toilets in northeast corner of LF	16:00
Downwind:	0		Measured in parking lot of office building	11:00

Comments/Notes:

The instrument was calibrated and checked for response time and precision on 6/20/24 at approx. 7:30 am using the 0 air and 500 ppm CH4 from the same cylinders identified above.
All readings are within 10% of the known calibration value. Response times are approximately 7.1 seconds, under the maximum of 30 seconds.
The gas cylinders identified above were used for the daily calibration and bump checks.

AED IRWin SX 580-010 92006439

Date:	6/20/2024
Calibration Performed By:	Steve Rapp
Warm-Up Time:	Approx. 15 mins.
Detector Calibrated:	AED IRWin SX 580-010 92006439

Calibration Gas: Methane (CH4)				
Calibration Gas	**Calibration Gas Supplier**	**Calibration Gas Expiration**	**Lot #**	**Cylinder #:**
Zero gas (0 ppmv CH4)	Pine Environmental Services	6/29/2027	304-402786171-1	UN10021121719481
500 ppmv CH4	Pine Environmental Services	6/29/2027	304-402785850-1	UN19561121719481

Time	**Location of Calibration**		**Notes:**	
Approx. 10:45:00 AM	Coffin Butte landfill office building, Carvallis, OR.			
Initial Accuracy Test				
Expected Reading (ppmv CH4)	**Zero**	**500**	**Notes:**	Used demand regulators.
Span Reading	0	500	Accepted/pass	
Calibration/Concentration Check				
Expected Reading (ppmv CH4)	**Zero**	**500**		
Instrument Reading	0	500	Accepted/pass	
Bump Check Date: 6/21/2024 Time: 14:28				
Expected Reading (ppmv CH4)		**500**		
Instrument Reading		470	Accepted/pass	
Bump Check Date: 6/21/2024 Time: 16:10				
Expected Reading (ppmv CH4)		**500**		
Instrument Reading		460	Accepted/pass	

Background concentrations (ppmv CH4):			**Location:**	**Time:**
Upwind:	0		Measured on road by portable toilets in northeast corner of LF	16:00
Downwind:	0		Measured in parking lot of office building	11:00

Comments/Notes:

The instrument was calibrated and checked for response time and precision on 6/20/24 at approx. 7:30 am using the 0 air and 500 ppm CH4 from the same cylinders identified above.
All readings are within 10% of the known calibration value. Response times are approximately 7.1 seconds, under the maximum of 30 seconds.
The gas cylinders identified above were used for the daily calibration and bump checks.

Precision and Response Time Checks:

Date:	Time:		Location:
6/20/2024	7:25 AM		Residence Inn, Portland, OR

AED IRWin SX 580-010 92006439

	Cal Gas (zero) 0 ppmv		Notes:
	Reading	Time	Demand regulator used.
Trial 1	0		
Trial 2	0		
Trial 3	0		
Average	0		

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	Cal Gas (mid): 500 ppmv CH4		Notes:
	Reading	Time	Demand regulator used.
Trial 1	500	6.78	
Trial 2	500	6.92	
Trial 3	500	7.59	
Average	500	7.1	All readings within 10%.All times within 30 seconds.

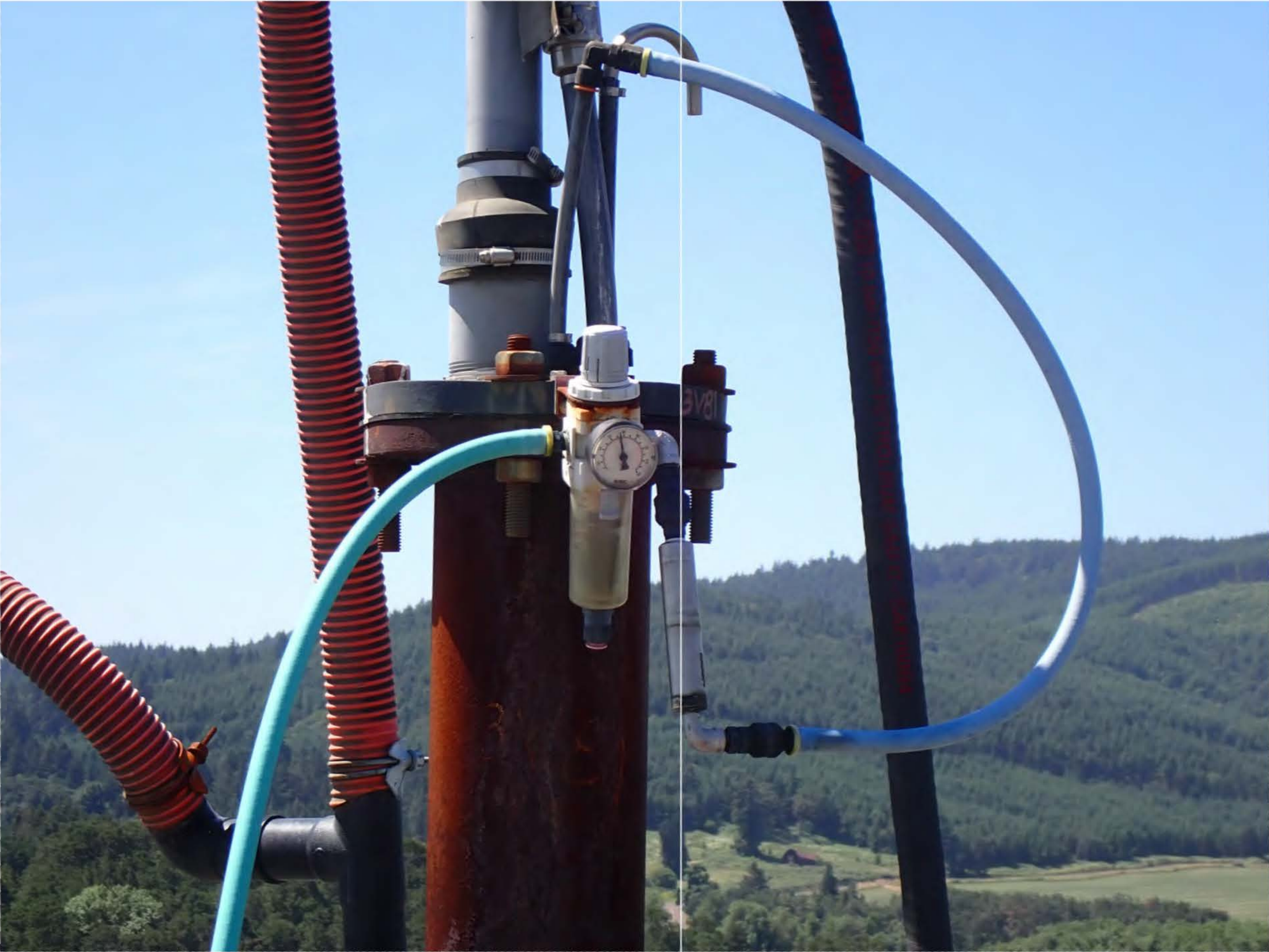
Calibration gas information:

Gas Concentration (ppmv CH4)	Calibration Gas	Lot #	Cylinder #	Expiration Date	Notes:
0	Pine Environmental Services	304-402786171-1	UN10021121719481	6/29/2027	Pressure = 300 psi. THC < 0.1 ppm, O2 = 20-22%
500	Pine Environmental Services	304-402785850-1	UN19561121719481	6/29/2027	Pressure = 400 psi. 500 ppmv CH4. Air 20.9% O2 in N2.


A3L


Cool
Outdoor Game


A6

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