

From: [Judy Hays-Eberts](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: Submission of testimony
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Attachments: [Coffin Butte Appeal Testimony.pdf](#)

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Please find attached testimony from Marys River Grange on the appeal of LU-24-027 submitted by

President Judy Hays-Eberts and the Membership of Marys River Grange #65
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Dear Commissioners Wyse, Malone, and Shepherd,

This letter is submitted by Marys River Grange #685, in opposition to the appeal by Republic of the proposed Coffin Butte landfill expansion, LU-24-027.

The members of Marys River Grange strongly oppose this expansion.

We feel the only appropriate response to this appeal to the proposed expansion is to deny it, and we sincerely hope you will place the well being of those you represent above the financial benefits of the proposed expansion. Please consider the potential impact upon the people of Benton County, our natural resources, and our industries that rely upon them.

Marys River Grange is the second largest Grange in Oregon, and active in supporting Benton County, especially the rural area near Philomath. Our ranks include many farms, from large ones such as Gathering Together Farm and Green Gables Farm, to family farms such as Sunbow Organic Produce and Windy Hill Farm and many in between.

We recognize the need for a disposal site, but to have it serve as the landfill for one third of the state is a disservice to all when safer alternatives such as Roosevelt Landfill in Gilliam County exist.

Our concerns are methane generation and the accumulation and dispersal of PFAS (forever chemicals), especially as exacerbated by heavy rainfall in our area. PFAS threaten the health of all residents, certainly farmers, and all consumers of Willamette Valley produce. The failure of inadequate lining and the ongoing disposal of leachate into our waterways impact every downstream community, and beyond. We believe that expansion will ultimately lead to an EPA superfund site, and toxic exposure for all future generations.

Exposure to PFAS is so dangerous, the EPA has determined there is NO safe level of exposure.

Current estimates of toxic leachate production at Coffin Butte exceeds 40 million gallons annually. This problem is exacerbated by the annual rainfall averaging 42 inches per year. Expansion will increase that number dramatically. Republic Services claims to "capture" it, only to dump it at local facilities that can't remove the PFAS, and may in fact be concentrating the toxins in biosolids that may end up on farmland. Farmers elsewhere who have used such biosolids as fertilizer have been completely shut down. Industry groups suggest that as many as 70 million acres of farmland have been polluted by toxic biosolids. The recent rise in cancer diagnosis, especially among younger people, is often attributed to this practice. The state of Maine has banned the use of biosolids completely.

In 2022 and 2024 the EPA found amounts of methane emissions that surpass state and federal regulations, which the company failed to report. The federal limit for methane concentrations is 500 parts per million. In 2022, the EPA reported more than 20 readings at Coffin Butte Landfill that exceeded 10,000 parts per million, earning it "super-emitter" status.

In 2021, Benton County was advised of some of these problems, and did not approve a similar application for expansion, yet the problems have worsened and the company efforts at compliance have been lax, with no corrective action. The problems that resulted in denial in 2021 are still present and, according to outside monitoring, even worse since

Several of the key findings from the just released Waterkeepers PFAS Report Phase II indicate the dangers of approving this expansion by exacerbating already existing problems.

2. Wastewater treatment plants and biosolids land application field discharges can be significant contributors of multiple types of PFAS to U.S. surface waters.
 - a. The overwhelming majority of WWTPs evaluated lack enforceable PFAS limits in their CWA NPDES and other permits—both for discharges to surface waters and for biosolids applied to land application fields—underscoring the urgent need for regulatory standards to control these releases.
 - b. 95% of downstream WWTPs sampling sites and 80% of downstream biosolids land application sites had elevated concentrations of multiple types of PFAS.
 - c. Out of 40 types of PFAS that can be detected by EPA Method 1633, in comparison to PFAS levels detected at upstream sampling sites, the sampling detected 19 types of PFAS at elevated levels downstream from WWTPs and 14 types of PFAS at elevated levels downstream from biosolids land application sites.
4. Current regulations fail to control PFAS pollution of U.S. surface waters, leaving communities at risk for toxic chemical exposure.

The lack of regulation should not be exploited for the purpose of profit when putting the health of people at risk.

The members of Marys River Grange would like to see better refuse management overall, as well as better monitoring of the site itself. We think Benton County could take a more proactive and forward-looking approach to refuse management. Lane County does this, and would be a quality resource. The Grange introduced the co-op to America, and in Philomath, Pioneer Telephone Co-op is an example of what we can accomplish. Perhaps a Refuse or Waste co-op would be a more beneficial solution than relying upon a corporation driven only to consider profit?

Whatever money the county may receive from this site, it is not enough to mortgage our future, our natural resources, our economy and our very citizens.

Sincerely,
Judy Hays-Eberts, President, and
The members of Marys River Grange #685.