From: Lindsey Hutchison
To: Coffin Butte Landfill Appeals
Subject: Coffin Butte Landfill Testimony
Date: Monday, September 22, 2025 10:57:28 AM
Attachments: Final Willamette Riverkeeper comment letter on Coffin Butte Title V Permit 06.06.25.pdf

Hello,

Willamette Riverkeeper is submitting the letter we sent to Oregon DEQ in June 2025 regarding expansion concerns at Coffin Butte Landfill and how it will affect air quality among other issues as testimony in opposition to Republic Services' appeal of Benton County Planning Commission's landfill expansion denial. If you have any questions, please let me know.

Sincerely,

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June 6, 2025

Oregon DEQ
Western Region Air Quality Permit Coordinator
4026 Fairview Industrial Drive SE
Salem, OR 97302

Submitted via email to wraqpermits@deq.oregon.gov

To Whom it May Concern:

Willamette Riverkeeper is submitting these comments due to concerns we have over the proposed Title V permit for the Coffin Butte Landfill. Willamette Riverkeeper is a 501(c)3 nonprofit working to protect and restore the Willamette River and its tributaries.

One primary concern we have is the almost 200% increase in particulate matter emissions, from 24 tons per year to 70 tons per year. This does not include the additional increases of small particulate matter (PM10) and fine particulate matter (PM2.5). The permit proposes to increase PM10 emissions by 11 tons per year (from 14 to 25) and PM2.5 by, we assume, 11 tons per year (from "NA" to 11). Overall, DEQ is proposing to increase all particulate matter emissions by 68 tons per year.

PM10 and PM2.5 are "inhalable into the lungs and can induce adverse health effects."[1] When inhaled, these particles can induce tissue damage and lung inflammation.[2] Other health impacts associated with short-term exposure of PM2.5 are "premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days."[3] These effects have been primarily observed in infants, children, and older adults with pre-existing conditions. Of all the common air pollutants, "PM2.5 is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and world-wide."[4] Short-term exposure to PM10 has mainly led to the worsening of respiratory diseases, including asthma and COPD.[5] Both PM2.5 and PM10 exposure are most likely to adversely affect older adults with chronic heart or lung disease, children, and asthmatics.

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[1] California Air Resources Board, *Inhalable Particulate Matter and Health (PM2.5 and PM10)*, https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health (last accessed June 5, 2025).
[2] *Id.*
[3] *Id.*
[4] *Id.*
[5] *Id.*

In addition to the negative health effects, particulate matter emissions also have a detrimental impact on the environment. Particulate matter can affect visibility and can contribute to climate change. Particulate matter emissions can also adversely affect ecosystems, "including plants, soil, and water through deposition of PM and its subsequent uptake by plants or its deposition into water where it can affect water quality and clarity."[6]

Besides increasing particulate matter emissions, this permit is proposing to increase sulfur dioxide by 3 tons per year, total reduced sulfur from "NA" to 13 tons per year, hydrogen sulfide from "NA" to 11 tons per year, and non-methane organic compounds by 23 tons per year. As with particulate matter, other air pollutants can pollute waterways. Pollutants such as sulfur "can lead to excess levels of acid in lakes and streams, and damage trees and forest soils."[7] Atmospheric deposition of sulfur "is a major stressor to natural ecosystems, often leading to acidification and eutrophication of both terrestrial and aquatic ecosystems."[8] Coffin Butte Landfill is located near the E.E. Wilson Wildlife Area and various waterways, which could be negatively impacted by the increased emissions. Willamette Riverkeeper urges the DEQ to conduct a cumulative impact assessment on nearby waterways and habitats, including potential air-to-water deposition pathways that affect the E.E. Wilson Wildlife Area and its surrounding tributaries.

We also seek clarification as to why the current greenhouse gas emissions limit is listed as "NA" and the proposed limit is 282,500 tons per year. How much is the facility currently emitting, and why is there no current limit? Is the 282,500 tons per year an increase or decrease in greenhouse gas emissions? **Willamette Riverkeeper requests that DEQ provide baseline data and justification for how this emissions threshold was established and whether it aligns with Oregon's climate goals and GHG reduction targets.**

While Willamette Riverkeeper recognizes the proposed reduction of nitrogen oxides, carbon monoxide, and volatile organic compounds, these reductions do not compensate for the significant increase in emissions of other pollutants proposed for this landfill. Allowing these increases and requiring no apparent mitigation for the negative effects they will have on human and environmental health is irresponsible and unreasonable. **Willamette Riverkeeper urges DEQ to protect our people, our wildlife, our natural spaces, and our waterways by disapproving the proposed increase in emissions and maintaining the current regulations.**

Finally, Willamette Riverkeeper urges Oregon DEQ to encourage the facility to consider alternatives to expanding the Coffin Butte Landfill that would reduce the environmental and public health risks in the Willamette Valley. This includes developing smaller, modern waste transfer stations or micro-landfills in less ecologically sensitive areas, reassessing

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[6] *Id.*

[7] U.S. Environmental Protection Agency, *Ecosystems and Air Quality*, https://www.epa.gov/eco-research/ecosystems-and-air-quality (last accessed June 5, 2025).

[8] *Id.*

the capacity of underutilized facilities, and accelerating statewide waste diversion efforts—such as banning landfill disposal of organic waste and expanding composting infrastructure. These actions would reduce pressure on Coffin Butte, better distribute environmental impacts, and align with Oregon's climate and materials management goals.

Thank you for your consideration.

Sincerely,

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