

From: [Doug Pollock](#)
To: [Coffin Butte Landfill Appeals](#); [MALONE Patrick](#); [SHEPHERD Gabe](#); [WYSE Nancy](#); [Howard Bruner](#); [Jeff Igelman](#); [Darcie Hamel](#); [Rana Foster](#); [Debra Fant](#)
Subject: Fwd: Input for DSAC & SWAC re: Coffin Butte Landfill Operations in 2022
Date: Sunday, October 19, 2025 4:10:36 PM

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Dear Benton County Commissioners,

I am submitting this email as public testimony in OPPOSITION to the expansion of the landfill (case # LU-24-027).

Please include this summary message, as well as the forwarded email (below) as part of the public record.

I sent this email to Benton County's SWAC and DSAC (waste management advisory committees) just over three years ago. I was prompted to share my decades of firsthand experience dealing with waste management issues (both as an environmental engineer working for Hewlett-Packard Co. and as a member of the Corvallis Eco-School Network) over concerns related to the possible expansion of the Coffin Butte Regional Landfill.

My broad experience (both professional and personal) in dealing with local waste issues has disclosed glaring shortcomings and frequent violations of waste management processes and laws.

Here are a few highlights which are relevant to the current expansion application for the dump:

- Prohibited, hazardous sources of waste are ROUTINELY disposed of via unregulated solid waste dumpsters in Corvallis. This includes hazardous liquids (paints, epoxies, solvents, etc.), refrigerant systems, electronic waste, fluorescent light bulbs, batteries, and significant sources of industrial waste (e.g. hundreds of tons of waste inkjet cartridges).
- These violations have come from a wide range of non-residential sources (include Oregon State University facilities and student housing, the Corvallis and Philomath School Districts, Hewlett-Packard, Samaritan Athletics, and other local businesses).
- Most of these sources/organizations have personnel who are responsible for ensuring compliance with waste management laws, yet the organizations routinely violate them (with no apparent consequences).
- The Oregon Department of Environmental Quality (DEQ) has refused to take enforcement actions even when I've presented photographic and video evidence which clearly documented waste violations.
- In nearly every case I reported, the responsible organizations or individuals gave dismissive or defensive responses. I was assured the violations were aberrations, despite repeated occurrences. I was warned I could be prosecuted for looking in dumpsters.

- After years of documented violations, Corvallis School District managers responded by locking all of their dumpsters. Despite these constraints, I've documented repeated violations (with the worst occurring at the school district's facilities office). The superintendents and school board members have repeatedly failed to take the violations seriously. There are deep institutional barriers to making meaningful change.

As my decades of experience show, our local solid waste streams regularly receive a wide array of hazardous and prohibited materials. By law, these materials should NOT be going into unregulated, solid waste dumpsters. It is my understanding that the disposal of these hazardous and prohibited items in the solid waste stream (going to the dump) constitutes a violation of the landfill's operating permit. I have tried to get clarification of this from both DEQ and Benton County staff, without success.

It is also my understanding that there is no regular, independent auditing process to ensure compliance with the landfill's operating permit and waste management laws. If there were a regular, independent auditing process for solid waste, I am certain its findings would reflect my findings: **hazardous and prohibited items are routinely disposed of in the solid waste, in violation of state laws; there is currently no effective enforcement mechanism to ensure compliance or hold organizations responsible.**

Given this situation, approving the landfill expansion would be irresponsible and would certainly increase and perpetuate waste violations. These hazardous/prohibited materials would further contribute to the dump's toxic legacy. This includes direct emissions from the landfill, as well as the hazardous leachate which currently ends up in the Willamette River, without treatment for many highly toxic compounds, including PFAS chemicals. This toxic legacy clearly imposes "*an undue burden on public resources*", in violation of Benton County Code 53.215 (1) and (2).

I urge you to take this information into account and REJECT the current application for expansion.

Sincerely,

Doug Pollock
(37293 Helm Drive, Corvallis, OR 97330)

----- Forwarded message -----

From: **Doug Pollock** <timberframing@gmail.com>

Date: Wed, Oct 5, 2022 at 3:02 PM

Subject: Input for DSAC & SWAC re: Coffin Butte Landfill Operations in 2022

To: RAY Linda <linda.ray@co.benton.or.us>

Cc: Ken Eklund <ken@writerguy.com>, vneqs <vneqs@googlegroups.com>, REDICK Daniel <daniel.redick@co.benton.or.us>, AUGEROT Xanthippe

<xanthippe.augerot@co.benton.or.us>, WYSE Nancy <nancy.wyse@co.benton.or.us>,

MALONE Patrick <pat.malone@co.benton.or.us>, <mayorandcouncil@corvallisoregon.gov>

Hi Linda,

Would you please share this input with both DSAC and SWAC, as well as Benton Co. staff who deal with solid waste issues?

Thanks!

Doug Pollock

Dear DSAC and SWAC members,

I have been actively monitoring dumpsters throughout Corvallis for a couple of decades, with a particular focus on those used by the Corvallis School District (CSD). I have done this because of a personal interest in sustainability, and as a member of the Corvallis Eco-School Network (a group of parents who worked on sustainability issues in our schools). I also worked on environmental issues in my previous career at Hewlett-Packard, where I served as their product steward for inkjet manufacturing. I would like to share some details of my work and the implications for managing solid waste at the Coffin Butte regional landfill. With my decades of hands-on experience, I have a better view than most people when it comes to what's actually going into the landfill.

When I first began my position at HP, they were dumping enormous quantities of defective inkjet cartridges in the landfill. HP was permitted to do this because their site environmental folks argued the plastic cartridge bodies *contained* the ink, thus preventing the chemicals from leaking into the landfill/leachate. I was determined to put a stop to this practice and started developing a recycling process for the scrap cartridges. One of my first steps was to visit the landfill and watch what actually happened to the cartridges. I took a video of a giant dozer crushing huge boxes of them (with ink spraying everywhere) to raise awareness and build support for my recycling process. Soon after word got out about my video, the landfill operators stopped accepting all of HP's waste cartridges. This helped provide the incentive to develop my recycling process (which was eventually expanded worldwide). But for a period of well over a decade, HP dumped substantial quantities of inkjet cartridges in the Coffin Butte landfill. This is part of the landfill's toxic legacy that people should know about.

Over the past ~15 years, I've also documented a large number of violations concerning waste in Corvallis school dumpsters. This includes numerous violations of Oregon's electronic waste law (e.g. a large television in a dumpster at Crescent Valley High School), and various hazardous waste violations (e.g. 5-gallon buckets of paint, refrigerators, fluorescent light tubes, etc.). In many cases, I provided pictures and sent emails to school district staff (including the facilities manager, principals, superintendent and school board members). My offers to meet with the previous superintendent and her staff to help them improve their recycling and waste disposal processes were consistently ignored. Surprisingly, many of the worst waste violations occurred in the dumpster located at the school district facilities office. In my initial discussion with the CSD custodial manager, I was appalled to discover that he wasn't even aware of Oregon's electronic waste law. He also admitted that the Corvallis School District had never developed process documentation governing the disposal of hazardous waste. Ignorance of the law is no defense, especially when you work for a public institution!

Almost without exception, the responses I've received from school district leaders over the years have been exceptionally poor. Their first response is almost always denial: "*That*

couldn't have come from our school!". In nearly every case, further investigation showed that, indeed, the material in question did come from the school. Their second response is usually defensive in nature: *"What were you doing looking in our dumpster?!"*. The former principal at Mountain View Elementary warned me, *"We just can't have parents looking in dumpsters!"* and implied she could take away my volunteer role managing the school garden. Eventually, the CSD responded to my dumpster complaints by installing locks on all of the dumpsters. They "solved" their waste disposal violations by simply hiding them from the general public.

Earlier this year, I discovered fluorescent light tubes in a large, open dumpster at Crescent Valley High School. The superintendent largely dismissed my email, speculating the bulbs came from a contractor working at the school. I explained this latest incident was part of a pattern of violations I'd documented over the past ~15 years, but neither the superintendent nor school board seemed to care. Over the following weeks, I documented repeated violations (including more fluorescent tubes in a large glass terrarium that presumably came from a science class). In each case, I filed an official complaint with DEQ about the incidents. Despite asking for a follow-up to my complaints, no one from DEQ contacted me until I called a manager and complained. Despite my substantial follow-up efforts (both with school district leaders and DEQ managers), my complaints were predictably dismissed. The DEQ staff person deferred to the CSD facilities manager who provided the usual excuses and knee-jerk responses. The DEQ person noted, *"The school district is going to reinforce locking of dumpsters at their properties to avoid further illegal dumping...This is the extent of DEQ's evaluation of your complaint. Thank you again for your concern. I will close complaint #22-0653 in DEQ's records."* I was particularly frustrated by DEQ's dismissive response because I had provided the case manager (Cathy Brown) with a lot of background information (about the CSD's history of waste violations). She was clearly unwilling to ask hard questions and hold the CSD manager accountable for the violations I had documented.

I've also frequently found waste violations in dumpsters on the OSU campus and at a Philomath school. This includes significant quantities of hazardous chemicals (e.g. epoxies, paints and solvents), a refrigerator, and electronic devices. I'd be remiss if I didn't also mention the enormous quantities of perfectly functional items that I've observed in dumpsters at our local schools: chalkboards, paper cutters, file cabinets, furniture, scores of bulletin boards, tables, projectors, books, large volumes of clothing (including brand new school T-shirts), science equipment, video cameras, copper wire, new electrical conduit and receptacles, motors, and hundreds of similar items. All of these items could have been easily diverted to Habitat for Humanity's ReStore or OSU's used equipment auction. The CSD's former sustainability coordinator also reported that an entire container load of chairs from Lincoln Elementary was sent to the landfill earlier this year. He had found an organization that was able to reuse them, but the CSD's facilities manager overruled him and had them crushed and sent to the landfill. Sadly, this is how the CSD has operated for decades.

I wanted to share these stories with you because they help to illustrate a number of very important points:

- **There are enormous opportunities to reduce solid waste, but our community leaders and public institutions seem to lack the political resolve to anything about**

it. In many cases, 70-80% of the waste in dumpsters consists of items and materials that could be easily diverted for recycling or reuse.

- As my dumpster finds and the history of HP's inkjet cartridge disposal show, **we must assume there's a considerable amount of hazardous waste going into the landfill on a regular basis.** This hidden, hazardous waste stream has been going on for many decades, without acknowledgement by either the landfill operators, county staff, or DEQ (as far as I'm aware).
- **I believe the waste violations I've documented constitute a breach of the landfill's operating permit with DEQ.** In the most recent case involving the dumpster at CV, the dumpsters were apparently still hauled to the landfill even though I reported they contained fluorescent light tubes (which had not been removed). **Without regular audits to ensure compliance, Republic Services has no idea whether or not they are violating their DEQ operating permit.**
- **There are considerable procedural and bureaucratic hurdles to reporting violations to DEQ concerning the landfill and waste disposal.** I spent a lot of time making phone calls and filling out DEQ complaints - and yet they were largely unresponsive and unwilling to take corrective action. This bureaucratic indifference discourages people from submitting complaints.

Though I've focused this message on violations of our laws governing waste disposal, the landfill operation has impacted my life in numerous, adverse ways. This includes offensive odors (on hundreds of occasions through the years), substantial quantities of litter on the roadway and along the roads leading to the landfill, dangerous loads being hauled to the landfill (a neighbor's wife was killed when she was hit by a trailer that came loose from someone returning from the landfill), increased traffic volumes and wear on our roads, and the substantial, irreversible changes to the character of our surrounding community due to the growing size of the landfill operation.

Thanks for considering my input,

Doug Pollock
37293 Helm Drive
Corvallis