

From: [Philipp Schmidt-Pathmann](#)
To: [Coffin Butte Landfill Appeals](#)
Cc: penny.rosenberg@lee.net; Cody.Mann@lee.net; tloew@salem.gannett.com
Subject: Uphold Denial of LU-24-027 - Submittal one of two
Date: Monday, October 20, 2025 3:56:45 PM

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Dear Benton County Commissioners:

My name is Philipp Schmidt-Pathmann, and I am the President and CEO of the Institute for Energy and Resource Management (IeRM). IeRM is a non-profit, 501c3 organization dedicated to scientific research and education in the field of solid waste management. Our team members have decades of experience in designing and managing solid waste facilities and programs, both in the US and Europe.

IeRM was involved in the Sustainable Materials Management Project as an observer, at the request and invitation of a group of concerned citizens. We attended all of the sessions and have a thorough understanding of the issues involved regarding the potential expansion of the Coffin Butte Landfill, Application LU-24-027. Based on our assessment, we recommend that **the application for expansion be denied**, for the following reasons:

1. IeRM has reviewed the permit violations that have occurred over the past several years. Of particular interest are the air quality violations, such as methane discharges, which exceeded the permit limits (500 parts per million) by over 10,000 ppm. Given the frequency of these exceedances, and the lack of any penalties and accountability associated with them, you can be assured that they will continue, if the landfill is expanded. This is clearly in violation of BCC 53.215(1), as well as the County's 2040 Thriving Communities Initiative.
2. Groundwater around the landfill has been contaminated by leachate leakages containing high levels of arsenic, PFAS (a class of materials known as "forever chemicals") and many other toxics. Again, given the frequency of these occurrences, it is highly unlikely that they will cease or even decline if the landfill is expanded. We can say with certainty that the risks of exposure not only to adjunct property owners but the entire area, its waterways, air, and soil are substantial and are in violation of BCC 53.215(1), as well as the State of Oregon water quality standards for groundwater and surface water.

Based on these clear and existing shortcomings, we urge you to reject the request for expansion, LU-24-027. Thank you for your consideration.

Sincerely,

Philipp Schmidt-Pathmann
President and CEO, IeRM
Newcastle, WA 98056