



REPUBLIC
SERVICES

28972 Coffin Butte Rd Corvallis, OR 97330
o 541.745.5792 f 541.230.5534 republicservices.com

January 15, 2025

To: Petra Schuetz, Benton County Community Development Department

Re: Methane Memo Addendum

Dear Director Schuetz:

As you're aware, Coffin Butte Landfill was inspected by the Environmental Protection Agency in June of 2022. During that inspection, the agency noted 61 exceedances during its surface emissions monitoring for methane.

Benton County's consultant, Maul Foster Alongi, requested that Coffin Butte Landfill provide additional information about how ongoing improvements to the Landfill's gas collection system may have impacted the methane emissions monitoring. Specifically, Maul Foster asked if we could provide detailed information about which of the 61 exceedances were in the construction zone.

During the 2022 inspection, DEQ walked two separate "loops" – one on the western side of the landfill, and a broader, wider loop that encompassed the eastern border and central sections of the landfill.

After the inspection and during a meeting with DEQ, Republic Services' personnel noted that the construction work would have impacted the areas that included flags #48 through #58.

Further review of that area, which includes wells 3V74, 2H86, and 2H94 in the central part of the landfill, indicates that there were at least 22 exceedance points in the general vicinity, or about 36 percent of the total.

It is important to note that during GCCS construction, portions of the system outside of the construction area can be temporarily impacted. This typically occurs when we have to isolate portions of landfill gas header and lateral piping to allow tie-ins and commissioning of new vertical and horizontal gas extraction wells.

As noted in our attached memo to Benton County, Republic Services took immediate corrective action following the 2022 EPA inspection, including adding cover soil and additional soil around the edges of tarps.

We also strengthened seals around the gas collection piping and completed work on an expansion of the Landfill's gas collection and control system, adding 6 new vertical wells and 9 horizontal well collectors.

In June 2024, Coffin Butte was the subject of a no-notice inspection by the EPA. Once again, inspectors conducted surface emissions monitoring at the landfill. While we have not received a formal report from the EPA, at the time of the June 2024 emissions monitoring, EPA inspectors said Coffin Butte was not the subject of an enforcement action. In addition, the landfill has made additional improvements since the inspection, including patching tears in the cover tarps and, once again, expanding the Landfill's gas collection and control system.

At this time, we have not received notification from the EPA that our corrective actions were insufficient, nor have we received notification from the agency that Coffin Butte is the subject of any pending enforcement action.

We continue to invest in the gas collection and control system and have another \$1 million enhancement project scheduled for later this year. That project will add 14 new vertical wells, seven new horizontal wells and approximately 12,000 new feet of header, force, and air lines.

Meanwhile, Coffin Butte continues to partner with PNGC power to generate electricity from gas produced at the site – enough to power 4,000 homes. Discussions with PNGC to draw additional gas from the Landfill are ongoing.

Coffin Butte has also updated its flare system, installing a closed flare in October, to comply with DEQ's latest regulations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ginger D. Richardson", is positioned above a light gray rectangular box.

Ginger D. Richardson
Director, Public Affairs
Republic Services