

June 5, 2025
File No. 27223197

MEMORANDUM

TO: Republic Services

FROM: James Walsh, P.E., BCEE, SCS Engineers

SUBJECT: Rebuttal to Public Comments Received May 2025
To Benton County Planning & Zoning Commission
On Landfill Fire Potential at Coffin Butte Landfill

From review of public comments provided, both in oral testimony and on the written record, in hearings for the Conditional Use Permit (CUP) on Coffin Butte Landfill, I summarize below 5 significant comments on landfill fire issues that I observed. Those comments and my responses to them are listed below.

1. Adair Fire Department

Comment: There were concerns voiced by an Adair Fire representative that property tax revenue to the Department has not kept up with Fire District growth and Department responsibilities. At the same time, there have been recent reductions in Adair Fire staffing. This may result in difficulties by the Department in meeting fire response needs in the future at Coffin Butte Landfill.

Response: Coffin Butte staff just met with Adair Fire in March 2025. The meeting went well with each party pledging to work together going forward, as well as they have in the past. In the meeting, the parties discussed a few ways both can engage and serve one another even better in the future. Meeting notes by both sides committed each party to continue the good working relationship of the past. There were no concerns expressed at that time about any possible service or support reduction from Adair Fire. Coffin Butte appreciates the past support Adair Fire has provided, and are hopeful it can continue in the future at the same level. With that said, it should be pointed out that most fires at the landfill have been handled properly and in full by landfill staff, and it is believed that will continue to be the case going forward.

2. FEMA Report

Comment: Adair Fire Department reported that they have reviewed a FEMA authored report on Landfill Fires suggesting that such fires can be large, can be fueled by landfill methane emissions, and may strain local fire services.



Response: We are well familiar with the FEMA document cited. FEMA often creates large debris piles from disaster cleanups. Waste in those can be left uncovered for months. Understandably, FEMA has had issues with fires in those large uncovered debris piles. However, FEMA has no operating experience with a modern MSW landfill like Coffin Butte Landfill or its fire potential or reality. Like any modern MSW landfill, Coffin Butte Landfill covers its waste each night and never has large areas of uncovered waste exposed for months at a time. Coffin Butte has far less fire potential than that reported by FEMA. Further, FEMA is simply mis-informed about methane emissions causing or exacerbating landfill fires. Landfill fires have nothing to do with methane emissions, not at Coffin Butte, and not at any modern MSW landfill. None of the past fires at Coffin Butte were created or exacerbated by methane.

3. Reporting Fires at Coffin Butte Landfill

Comment: It was suggested that Coffin Butte compile a running log of landfill fire incidents. And develop Incident Reports for each landfill fire. And that the Landfill's Operations Plan commits it to report each landfill fire event to OR DEQ.

Response: In response to community comments related to being apprised of fire events, Coffin Butte will maintain a log of fire incidents at the Landfill and a Coffin Butte representative will provide a verbal report on fire events at each Benton County Disposal Site Advisory Committee meeting. Further, Coffin Butte will ensure it is reporting each fire event to OR DEQ.

4. Magnitude of Landfill Fire Risks

Comment: One public commenter cited the SCS report as identifying 5 fires at Coffin Butte Landfill from 1999 to 2025 which they suggested was inconsistent with records from Adair Fire that report 28 calls for fire at the Landfill between 2013 and 2025. It was further stated that the SCS report identified 3 types of landfill fires that represent a material risk. There are many additional fire risks beyond those 3. The commenter concluded that the SCS report drastically under-represented the number, types, and magnitude of landfill fire risks.

Response: As the report makes clear, the 5 fires reported were those material and memorable to landfill staff, and representative of each of the 2 kinds of landfill fire that the landfill has experienced to date: working face fires and grass fires. It wasn't intended to identify any and all fires. Further, the landfill is confident there are only 3 types of landfill fires that could pose a material risk at Coffin Butte Landfill. Any others beyond those 3 have never occurred at the landfill, and we do not have a reasonable basis to believe there ever will be. The report fairly represents the number, types, and magnitude of landfill fire risks. Fires at the landfill have been safely and correctly managed to date, and will be so in the future, ensuring no significant impact on the community or environment.

The landfill abides by the state of the practice for landfill fire management like at any other modern MSW landfill. Many will recall the 1999 landfill fire that was significant. That was when the site was owned and operated by the prior operator, not Republic Services. The only way that could have occurred is if many acres of waste were left uncovered and exposed for weeks on end. Republic

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covers all waste at the confined daily working face at the end of each working day, with very few exceptions which are quickly addressed. There is no reasonable basis to believe that a fire of that size would reoccur with Republic Services.

5. On-Site Water Truck

Comment: It was reported that the 4,000 gallon water truck on site is defective, does not work, and would offer no value in extinguishing landfill fire.

Response: That statement is completely false. Landfill staff report that the subject water truck has been in continuous service in past years and is fully available at all times to help extinguish fires. In fact, that truck has been employed many times over the years to help extinguish both grass fires and working face fires.