June 20, 2025
File No. 04225008.00

MEMORANDUM

TO: Jeffrey G. Condit– Miller Nash LLP

FROM: Jeff Leadford, P.E. – SCS Engineers

SUBJECT: Valley Neighbors for Environmental Quality and Safety Testimony Response at the Coffin Butte Landfill

The Coffin Butte Landfill (Coffin Butte, or Landfill) is currently in the application process of a proposed expansion. On June 10, 2025 the Valley Neighbors for Environmental Quality and Safety (VNEQS) submitted testimony and documents in opposition to the proposed expansion effort (Testimony). This memo serves as the SCS Engineers (SCS) response to this Testimony's odor-specific issues raised, including critiques of SCS's "Coffin Butte Landfill 2024 Expansion Application Odor Dispersion Modeling Study (Modeling Study). The odor portion of the Testimony starts on Page 10 of the submittal with a summary starting on Page 3. SCS is providing the following responses to flaws mentioned in the Testimony:

The VNEQS states that "the odor consultant's assertion that 1% of odor complaints are "likely" caused by the landfill" [Testimony Page 5] and "Applicant's consultants then conclude that only 1% "likely" originate from the landfill" [Testimony Page 10]. These statements are misleading as they both take the odor complaint analysis results out of context by failing to mention the results were based upon correlation to wind conditions measured on-site. If complaints did not include location and/or time stamps, then they could not be properly corelated to the Landfill as the potential odor source.

Flaw #1 translates cubic yards to tons and mentions these are roughly comparable, but gives no reference to that comparison. Landfill municipal solid waste (MSW) does compress over time, but this will end up with less volume as well. Coffin Butte's Waste in Place report for 2023 noted only 21,537,961 tons in the landfill by the end of 2023. A standard ratio of 0.6 tons per cubic yard is used in the industry, which is significantly less than what the Testimony implies.

Flaw #2 mentions that the closure year is incorrect. Years of capacity in both the current landfill area and expansion area are estimates. Year 2052 was determined (as mentioned in Section 3.2 of the Modeling Study) assuming 2023 waste acceptance rates continued moving forward until the full capacity of 41,110,068 tons was reached.

Flaw #3 cites inconsistencies in landfill gas collection efficiency. There are various estimations of collection efficiency at landfills, and all are quite variable. The EPA has determined a conservative default efficiency of 75% which is referenced on Page 10 of the Modeling Study. VNEQS is using

Carbon Mapper to estimate collection efficiency in this Flaw citation, but gives no data to backup its claim. A brief aerial map of methane at the Landfill from Carbon Mapper does not seem to give an accurate representation of annual landfill gas fugitive emissions. These total fugitive emissions then would need to be compared to the total amount of gas collected to estimate collection efficiency.

Flaw #4 correctly notes that increased surface area will allow more area for fugitive gas to escape. This will be combated with additional gas collection wells in the new expansion area, as required under Federal and State air regulations. However, regardless of where waste is deposited it will be emitting the same amount of gas over time.

Flaw #5 mentions that the 84 odor complaints were "cherry picked" from the hundreds of odor complaints filled out by residents. As mentioned in Section 2.7 of the Modeling Study, Coffin Butte maintains a log of odor complaints received from the public and the Oregon Department of Environmental Quality (DEQ). All odor complaints in this log from 2022 through 2024 were assessed and none were left out. If additional complaints were recorded and not submitted to the Landfill's log, SCS is willing to perform a more expansive analysis if the complaint data can be supplied.

If you have any questions, please contact Jeff Leadford at jleadford@scsengineers.com or 720-272-0172.

Sincerely,

Jeff Leadford, PE
Senior Project Professional
SCS ENGINEERS