

Memorandum

To: Jeff Condit

Date: June 19, 2025

From: John M. Hower, Geo-Logic Associates, Inc.
Eric J. Tuppan, Tuppan Consultants LLC

Subject: Response to comments from Valley Neighbors for Environmental Quality and Safety
in response to CUP Application for the expansion of the Coffin Butte Landfill

The following are responses to VNEQS comments received following submittal of the Conditional Use Permit (CUP) application for the Coffin Butte Landfill.

Page 17 - Response to Comments concerning the effect of Development on Dewatering

Valley Landfills, Inc (VLI) previously responded to comments concerned with the effect of the development on the water table and the potential to dewater private water supply wells south of the development. Please refer to page 2 of the June 11, 2025 Memorandum to Jeff Condit prepared by Geo-Logic Associates, Inc. and Tuppan Consultants LLC. VLI's evaluation of the impacts to local water supply wells considers the relative consistency of the groundwater flow conditions to support a conservative assumption that fractured bedrock behaves similarly to a porous media. Under this assumption, all fractures are interconnected, allowing the analytical solution to evaluate the most widespread effect of the proposed project. As stated in the referenced response, the analyses indicated that the change in water levels associated with the proposed development would be similar to changes in water levels associated with seasonal precipitation patterns. VLI will also implement a robust monitoring program and will work with the community to address project-related changes in groundwater availability should those occur. We also note that with adoption of the CUP, VLI will conduct a focused hydrogeologic investigation of the proposed development to confirm and quantify the hydrogeologic conditions in this area of the site.

VNEQS also expressed concern about the effects of the existing landfill operations on outbuilding foundations and a livestock pond northwest of the existing facility. It is unclear how

dewatering would affect concrete foundations, and so without more detail regarding the foundations mentioned in the comment, no appropriate response can be developed.

Page 19 - Response to Comments concerning the adequacy of the Composite Liner System

VLI previously responded to comments concerned with the proposed composite liner system. Please refer to pages 16 and 17 of the June 11, 2025 Memorandum to Jeff Condit prepared by Geo-Logic Associates, Inc. and Tuppan Consultants LLC. As stated in that response, the composite liner system for the proposed development exceeds the current State of Oregon and federal regulatory standards for composite liner system designs for municipal solid waste landfills, and will provide superior protection against groundwater contamination when compared to the prescriptive standard composite liner system design. The designs and construction projects for all previous composite liner systems have been approved by Oregon Department of Environmental Quality (ODEQ), and there has been no evidence of a release to groundwater from portions of the Coffin Butte Landfill equipped with composite liner systems.

Pages 19 through 23 - Response to Comments concerning Groundwater Contamination

Arsenic Concerns

The occurrence of arsenic in groundwater was addressed on pages 4 through 8 of the June 11, 2025 Memorandum to Jeff Condit prepared by Geo-Logic Associates, Inc. and Tuppan Consultants LLC. As demonstrated therein, the occurrence of arsenic in wells MW-9B, MW-26, and MW-27 are attributed to natural background conditions.

PFAS Concerns

The occurrence of PFAS in leachate was addressed on pages 14 and 15 of the June 11, 2025 Memorandum to Jeff Condit prepared by Geo-Logic Associates, Inc. and Tuppan Consultants LLC. VLI notes that current federal, state, and site-specific regulations for landfill environmental monitoring do not require groundwater samples to be analyzed for PFAS. VLI notes that last year, 48.1 percent of the CBL leachate (approximately 23.14 million gallons) was transported from the CBL to the City of Corvallis wastewater treatment facility, accounting for approximately 0.0058 percent of all liquids treated at the wastewater treatment plant last year based on the

City of Corvallis website. As a result, the contribution of PFAS from landfill leachate is expected to be very small.

VNEQS also expressed concern over lack of available PFAS treatment and the potential for PFAS to be discharged into the Willamette River from biosolids. VLI notes that US EPA has identified three commercially-available and widely-utilized treatment technologies that are effective at removing or reducing PFAS in water. These include: granular activated carbon filtration, reverse osmosis filtration, and ion exchange resins. (Source: [FACT SHEET: Water Filters](#)). The City of Corvallis uses carbon filtration at its Taylor Water Treatment Plant to remove organic compounds in water, including PFAS.

VLI also notes that the City of Corvallis actively monitors and treats the municipal water supply for PFAS. Importantly, the City has not detected PFAS in drinking water samples. According to the City of Corvallis 2025 Water Quality Report and the City's website, PFAS have not been detected in drinking water (emphasis added):

*PFAS chemicals are so widely used, they seep into our air, soil, and our water systems. The good news is that PFAS have only been found in a few small public drinking systems in Oregon, and never in Corvallis. Though these chemicals may not originate in waterways (or in water or wastewater treatment facilities) many Oregon clean water utilities, including Corvallis, are taking action to protect public health by: **Testing for PFAS in wastewater and wastewater biosolids**; tracking current research on PFAS; working with policy makers to reduce PFAS in consumer products; and informing customers about the latest PFAS news. **PFAS and phthalates have not been detected in Corvallis drinking water.***

(Source: <https://www.corvallisoregon.gov/publicworks/page/what-are-pfas-and-phthalates>)

Domestic Well Contamination Concern

VLI asserts that the statement provided in the "History of Domestic Well Contamination" subsection of VNEQS' comment is inaccurate. At the time that VLI was conducting a remedial investigation for the west side of the landfill in the mid-1990s, their consultants prepared a Preliminary Assessment (EMCON, 1996) for the ODEQ. That report found that no health-based drinking water standards were exceeded in groundwater samples from monitoring wells downgradient of the Closed Landfill or in the Helms well, located southwest of Soap Creek approximately 500 feet from the landfill boundary. Prior to issuance of that report and based upon a recommendation from their consultant, VLI had installed water treatment at the Helms

wellhead, in May 1994, and implemented quarterly monitoring of the domestic well to provide redundant protective measures of the drinking water supply. In addition to these measures, VLI had arranged to purchase the property from Mr. Helms as part of their policy to purchase properties near or adjacent to the landfill. Neither that purchase nor the decommissioning of the well was required by the ODEQ.

At the conclusion of the remedial investigation regulatory process that had been ongoing for the west side of the landfill, VLI submitted a Focused Remedial Investigation and Feasibility Study (Tuppan, 2003) that included recommendations to ensure the protectiveness of the remedy, including decommissioning two unused water supply wells (one of which was the Helms well and the other was an old water supply well for the landfill) and property purchases as buffer around the landfill (the Helms property).

Subsequently, the ODEQ's Staff Report (August 2004) and Record of Decision (October 2005) adopted the recommendation to decommission water wells within areas potentially downgradient of impacts since that measure removes potential exposure to contaminants in groundwater. One of the two wells included the Helms well. That well was decommissioned in September 2006. By that time, the Helms property had already been purchased by VLI.

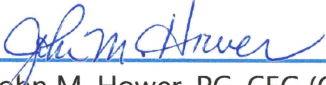
Domestic Well Impact Concern

As stated on VLI's responses to comments concerning the impacts of blasting and the presence of arsenic at the CBL, VLI is committed to safeguarding the groundwater resources in the communities surrounding the landfill. On pages 4 and 8 of the June 11, 2025 Memorandum to Jeff Condit prepared by Geo-Logic Associates, Inc. and Tuppan Consultants LLC, VLI outlines a groundwater monitoring and response program to address changes in groundwater levels or chemistry that could affect the community.

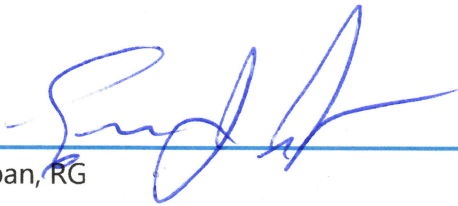
Willamette Basin Contamination Concern

The CBL is equipped with a robust groundwater monitoring network designed to detect a release from the landfill at the edge of the waste management units, long before potential contamination would leave the landfill property and migrate into the Willamette Basin. This early detection monitoring ability provides space within the landfill property to effectively treat a release before contamination could leave the landfill property and affect the Willamette Basin. The proposed development will add to the existing groundwater monitoring network, and will increase the capability of detecting a release from the landfill.

Respectfully submitted,



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