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June 12, 2025

Benton County Planning Commission
c/o Petra Schuetz, Community Development Director
Benton County Community Development
4500 SW Research Way
Corvallis, OR 97330-1139

Subject: File No. LU-24-027

Dear Benton County Planning Commission:

We represent Valley Landfills, Inc., the Applicant for above-referenced conditional use permit. Please accept the following into the record of the proceedings on the application. These additional documents address the staff report and testimony submitted at the April 29, May 1, May 6, and May 8, Planning Commission hearings.

In our June 6, 2025, submittal, we noted that the Applicant would submit an additional response related to groundwater questions and issues raised in testimony. Attached please find a memorandum dated June 12, 2025, from John M. Hower of Geo-Logic Associates, Inc., and Eric Tuppan of Tuppan Consultants, LLC. Please accept this memorandum into the record as Applicant's Exhibit 49.

The memorandum addresses the following issues raised in testimony during and after the hearing.

Seismic Disturbance. The memorandum describes the blasting that will occur and concludes that the blasting impact will be roughly equivalent to disturbance of rock using conventional earth-moving equipment and will be far below the levels that can result in building damage. The Applicant will comply with all requirements of its DOGAMI permit and will provide notice of blasting to surrounding property owners.

Groundwater Interruption. The memorandum analyzes whether the blasting and excavation on the new cell in the expansion area will impact wells on surrounding properties. The analysis concludes that these activities should not have any material impact on surrounding wells but proposes ongoing monitoring and mitigation if necessary.

Arsenic in Groundwater. The memorandum analyzes whether the leachate from the expansion will increase arsenic in groundwater above naturally occurring levels. After reviewing the

groundwater data, the analysis concludes that groundwater is not being affected by a leachate release. The memorandum recommends ongoing monitoring and mitigation if necessary.

Stormwater and Surface Water Management. The memorandum responds to requests for more detail about surface water flow and surface water management in the current landfill and in the expansion area.

Stormwater Runoff Flowing into Knife River Quarry. The memorandum responds to a comment that stormwater runoff was entering the Knife River quarry. The memorandum concludes that existing grades and engineered controls are designed to prevent stormwater runoff from landfill areas commingling with runoff from the quarry area.

Volume of Leachate from Cells 1 and 1a. The memorandum addresses questions regarding the amount of leachate generated from Cells 1 and 1a.

Concentration of Metals and PFAS in Leachate. The memorandum addresses comments about elevated metals and PFAS in Coffin Butte Landfill leachate. The memorandum analyzes the available data and concludes that the levels of metals and PFAS in Coffin Butte leachate is comparable to other municipal solid waste landfills.

Leachate Seeps. The memorandum acknowledges that leachate seeps have occurred in the past, but explains how current cover and management practices significantly reduce the likelihood of leachate accumulation and the formation of seeps.

Liner System. The memorandum discusses and describes the proposed composite liner system, that it far exceeds current standards, and will be designed and installed as approved by DEQ.

The Applicant would be pleased to answer any questions that you may have about this submittal and our prior submittals. We will continue to monitor testimony as it is submitted and will submit additional responses as necessary.

Thank you for your consideration.

Very truly yours,



Jeffrey G. Condit