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Corvallis, OR 97333

PORTLAND OR RPDC 972

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Benton County Community Development
4500 SW Research Way
Corvallis, OR 97333-1139

Attn: Coffin Butte Landfill Comment.

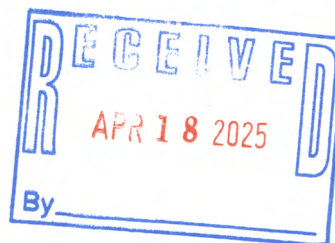
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April 14, 2025

Attn: Benton County Planning Commission

Re: Proposal to Expand the Coffin Butte Landfill



Dear Planning Commissioners:

I am writing to urge the Benton County Planning Commission (BCPC) to deny Republic Services' request to expand the Coffin Butte Landfill (CBL) located near Adair Village in northern Benton County.

As a PhD toxicologist, former EPA employee, former OSU faculty member, and cancer researcher for many years, I was greatly alarmed to learn of the unprecedented exceedance of methane concentrations from the CBL currently spreading throughout the Valley. Several studies have verified that methane levels are greatly exceeding allowable limits. Methane emission levels are tightly controlled for human health and safety reasons, and due to their adverse impacts on the environment.

The EPA has previously cited Republic Services for worker health safety violations. In January of this year the EPA issued a subpoena to Republic Services for a detailed record of the amount of trash the landfill is accepting, its gas collection and emission control systems, its surface monitoring of pollutants, etc. It is clear that the EPA considers these violations to be serious.

Given that Republic Services is currently under investigation for violations of the Clean Air Act and other environmental laws, it is EXTREMELY inappropriate and reckless at this time to grant an expansion of this operation. It is clear that Republic Services is either incapable of properly operating the landfill or, even more disturbing, is not concerned about the effects of toxic releases into our community. In addition, given that the expansion will only add a few more years of operation to this facility, it makes no sense to move forward with ANY future plans for the CBL until the current problems facing the CBL are addressed and corrected.

In the last 7-8 years it is also clear that Republic Services has not been complying with EPA regulations with respect to the proper handling of liquid toxic wastes generated by the landfill. In addition to the methane problem, there are profound concerns about the handling of leachate generated by the landfill. The leachate contains many chemicals that are extremely toxic to human health and the environment, including polyfluoroalkyl substances (PFAS) and other heavy metals. PFAS chemicals, which are being discharged into Oregon waterways, are

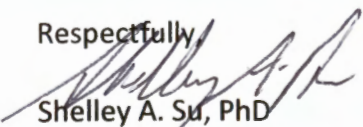
some of the most dangerous chemicals on earth. Referred to as "forever chemicals" because of their extreme longevity and consequent accumulation in the environment, PFAS chemicals cause a myriad of health effects, including cancers, reproductive effects, thyroid disease, liver disease, etc., in concentrations as low as parts per trillion. People and animals can be exposed by eating food grown or raised in PFAS-contaminated soil or water, including agricultural products, and wild fish and game.

Further, I would like the BCPC to also consider that, given the CBL is in close proximity to many homes in the area, as well as several national wildlife refuges and the Willamette River, these current emissions are not to be tolerated. Both the BCPC and the Benton County Commissioners (BCC), who hold the ultimate responsibility for the decision whether or not to expand the CBL, must prioritize the health of its citizens, as well as the dangers to wildlife and the environment, in making this decision. As a citizen who has lived in the Willamette Valley for over 50 years, it is my belief that allowing these emissions to continue, let alone to decide to increase the size of the CBL given the current state of its poor management, is not in keeping with the longstanding respect and stewardship of the Oregon people and their commitment to the environment. It is, in fact, willful misconduct and gross negligence.

In addition, the problem of Republic Services' long-term lack of attention to proper handling of the CBL is being felt, not just in the immediate vicinity of the dump, but in other counties miles from the site. As each year passes the impact of this mismanagement is being felt further and further away. This is unfair to the communities that surround Benton County, and they should not be required to suffer the consequences of poor decisions made by us. These people are our neighbors and our friends, and they deserve our/your respect and support.

I strongly urge you to vote NO on the Coffin Butte Expansion. Lastly, I want to point out that, as a representative of the citizens of this community, your responsibility lies in the PROTECTION of the citizens of Benton County and the state of Oregon. Our citizens do not want or deserve this toxic mess. We deserve better.

Respectfully,



Shelley A. Su, PhD

Oregon State University (ret.)