

April 20, 2025

TO: Benton County Planning Commission, Nick Fowler, Chair

RE: LU-24-027



As a resident of Benton County, I strongly oppose the application to expand the landfill.

Welcome to Corvallis: We have a superfund site.

It's called United Chromium Products.

Because superfund sites include so many forever chemicals, they are our forever friends.

But, we might actually have another Superfund site; that will be for you to decide.

In the late 1970s, toxic waste dumps such as Love Canal received national attention when the public learned about the risks to human health and the environment posed by contaminated sites. In response, Congress in 1980 established the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). CERCLA is informally called Superfund. Superfund was created to address health and environmental risks posed by contaminated toxic waste sites. Through a federal process sites like Love Canal-1984, Rocky Flats-1989 and Hanford-1988 ended up on the NPL (the National Priorities List) and became designated Superfund sites.

Oddly, the Hanford site is also in Benton Co, Benton County Washington on the Columbia River.

United Chrome Products is a superfund site just south of Corvallis and owned by the city. Past activities contaminated the soil and groundwater with chromium and other hazardous wastes. EPA added the site to the Superfund list in **1984**. **Chromium contaminated soils were taken off site for disposal**. Today 40+ years later, the city pumps and treats groundwater to remove contamination and continues to perform long term groundwater monitoring. Forever chemicals, forever friends.

Where were the chromium contaminated soils taken?

I don't know the answer to that question, but I do know that at the Superfund site next door in Linn County waste went to Coffin Butte.

That site, **Teledyne (now Wah Chang)** was added to the Superfund list in **1983**. It is one of the country's largest producers of rare earth metals and alloys. Waste from Teledyne/Wah Chang went to Coffin Butte moreover, it apparently went into an unlined cell. After it began leaking and contaminating groundwater, DEQ required it to be moved to a lined cell in 1992.

So if Teledyne/Wah Chang is a Superfund site, and its waste went to Coffin Butte, maybe Coffin Butte too is a Superfund site.

Consumers Power Inc (CPI) formerly located in Corvallis near Ninth and Circle (now Buffalo Wild Wings, Jimmy Johns and Walmart) produced soil contaminated waste containing wood preservatives (used to treat power poles) and PCB's from leaking transformers. It went to Coffin Butte.

Following the Santiam wildfires in 2020, the EPA identified and removed about 300,000 pounds of hazardous waste from affected properties. It's a long list but included: fuel, petroleum, car batteries, solvents, pesticides, propane tanks, ammunition and asbestos. It went to Coffin Butte.

Toxic fly ash from Covanta's Marion Waste Incinerator containing dioxin and heavy metals is used as a daily cover at the landfill.

The following are headlines from the Gazette-Times:

1976 "Wah Chang waste ignites, landfill operator cannot use water for fear of explosion"

1977 "Radioactive material found at Coffin Butte, Radium 222, as deadly as plutonium, concerns about groundwater contamination"

1979 "Commissioners require home developer to notify buyers of proximity of home to dump"

1979 "Diesel soaked pot plants to be taken to landfill"

1996 "Local Landfill got OK to pump polluted water into Willamette"

All this toxic waste **deposited** over decades at Coffin Butte produces leachate -in 2021, 31 million gallons- which is pumped and trucked to local municipal wastewater treatment facilities unequipped to deal with it, so many toxics including PFAS -forever chemicals- pass through the plant and are discharged into the Willamette River. The subsurface geology at CB is poorly understood, so the extent of groundwater contamination is unclear, but groundwater connects to surface water and the landfill is only about ten miles from the Willamette River.

Finally ENRAC -the Environment and Natural Resources Advisory Committee for the county, after lengthy and extensive research published a substantive report on the Coffin Butte Expansion and voted 5-1 to recommend denial of Republic's application to expand the landfill.

Welcome to our town.

I understand the local theater company is contemplating a production of An Enemy of the People.
We have a superfund site, we may soon have another.

Respectfully,
Elizabeth G. Conner
1465 NW 13th St
Corvallis - OR 97330

April 20, 2025

TO: Benton County Planning Commission, Nick Fowler Chair

RE: LU-24-027



First, I want to thank each Planning Commissioner for all the work you do and for your attention to this issue.

The key consideration I want to address in the Benton County Code is **BCC 53.215(1)** which states: "The proposed use does not **seriously interfere** with uses on adjacent property, with the **character** of the **area...**".

On the contrary, I think the new land use: the Coffin Butte expansion, patently defies and is antithetical to this criteria.

As a resident of Benton County, I strongly oppose the application to expand the landfill.

Specifically, I want to address the terms: 'seriously interfere', 'character' and 'area'.

I come at this from a recreationist point of view: as an avid hiker, biker and kayaker.

I'm a fairly new resident of Corvallis. I grew up in Pennsylvania, across the river from Three Mile Island, lived near the radioactive canyons of Los Alamos for decades, now it's a 'supersize me' landfill called Coffin Butte.

I used to love biking in the Coffin Butte area for its rural character and variety of terrain: forest, farmland, vineyards and parks like Sarah Helmick. Truly, riding out of town, up and over the saddle and out Soap Creek Road in early April, is magical, a kind of Currier and Ives pastoral scene. Maybe when you hit Tampico, you get lucky and see a herd of elk... but ride a little further ... and you've entered a Cormac McCarthy novel - an industrial zone with a hulking black mountain of trash, carved out of the butte.

These days, I have to think twice about riding out there. Some routes like Independence Highway, I no longer do: trash litters the roadside and the heavy and often aggressive truck traffic is prohibitive. I'm not alone in this thinking, I know many bikers who feel the same way. Too many stories of close calls and near misses; sooner or later there will be an accident or worse; it really isn't a question of **if**, but **when**. It's just **not safe**.

Safety concerns interfere with enjoying the area, but so do health risks.

Landfills are notorious methane polluters and the third largest source of methane in the country. EPA found explosive levels of methane leaking from Coffin Butte in 2022. In July 2023, Carbon Mapper showed methane at super-emissions levels and a methane plume extending over a mile. In addition to methane thirty different hazardous pollutants are emitted at Coffin Butte, including: particulates, heavy metals, VOC's and sulfides totaling 14,500 pounds in 2021. Other expert testimony speaks in depth to these health risks, but from a personal view once you know this information, you can't unknow it. When I'm hiking or biking, I'm exerting myself, breathing harder, inhaling deeper, longer, noticing, paying attention. If there's wind, a headwind everything gets ramped up. And what is that wind doing with all the toxic incinerator ash capping the landfill...? Now that I've seen that plume on a map, I know where it is and how far it extends; I'm thinking about that. The 'pastoralness' of my ride is gone.

Beyond serious health and safety concerns, Coffin Butte is a brutal assault to the senses:

the noxious smell, the visual degradation to the land and the noise of heavy machinery and trucks.

I've described the current situation, the landfill expansion is simply a multiplier.

For me these factors seriously interfere with this valued recreation area.

The current area of the landfill is 178 acres (trash collection), the expansion adds 30% of that for a total of 232 acres; a football field is roughly an acre, so think 232 football fields. But that's not really the 'area' of the landfill.

A landfill -by its very nature- affects the land (forests and farms), water (groundwater, run-off, local watershed) and air that surround it. It helps me to think of 'area' as three dimensional.

Leachate -the percolated liquid moving through the garbage- from Coffin Butte contains dissolved heavy metals, carcinogenic industrial solvents and PFAS, forever chemicals. In 2021, 31 million gallons of leachate was pumped out of the landfill and trucked to wastewater treatment plants in Salem and Corvallis. Municipal water treatment plants are unequipped to process the leachate, so many toxics pass through the plant and are discharged into the Willamette.

But leachate contaminates the area in two distinct ways. It also percolates into the groundwater -from

unlined cells (the old Coffin Butte was a military dump for Camp Adair and didn't require liners) and from leaks in current liners— enters the water table and eventually makes its way to the river about ten miles away. Experts say 'all liners eventually leak' and at least one drinking water well in the area has been contaminated.

Kayaking?? on the Willamette....

In short the health and safety risks, the interrupted integrity of this rural area **seriously interfere** with the **character** of this area.

Just recently, ENRAC -the Environment and Natural Resources Advisory Committee for the county, after lengthy and extensive research compiled a substantive report on the Coffin Butte Expansion and voted 5-1 to recommend denial of Republic's application to expand the landfill.

Respectfully,

Elizabeth G. Connor

1465 NW 13th St

Corvallis - OR 97330