

**From:** [Carol McClelland Fields](#)  
**To:** [Benton Public Comment](#)  
**Subject:** Public Comment to Oppose/Deny LU-24-027 - odor - methane  
**Date:** Thursday, May 1, 2025 4:45:20 PM  
**Attachments:** [Testimony - LU-24-027 - Carol McClelland Fields - odor-methane.pdf](#)

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Carol McClelland Fields  
37326 Soap Creek Rd  
Corvallis, OR 97330

Thank you for accepting my public comment and for all the work you are doing to keep everything organized.

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**Carol McClelland Fields, PhD, BCC**  
541 243 3675

To: [publiccomment@bentoncountyor.gov](mailto:publiccomment@bentoncountyor.gov)

**Subject: Oppose/Deny LU-24-027 -A Garbage-Truck Sized Hole in the Community Wildlife Protection Plan (CWPP)**

Dear Benton County Planning Commissioners,

My name is Carol McClelland Fields, and I live at 37326 Soap Creek Rd about four miles from Coffin Butte Landfill.

**I strongly oppose** Republic Services' Conditional Use Permit application LU-24-027 to expand the Coffin Butte landfill. I urge the Planning Commission to deny this application because the proposed use seriously interferes with uses on adjacent property, with the character of the area, or with the purpose of the zone [Benton County Code 53.215 (1)]

I live 4.1 miles south of Coffin Butte Landfill.

On a good day, I don't smell any landfill stench.

On a bad day, I smell the landfill stench as soon as I walk out my door in the morning. I limit my time outdoors on these days!

**On a very bad day, I smell the landfill stench INSIDE MY HOUSE!** Specifically on the second floor of my home. This has happened twice in 2025...so far. It's a very disconcerting sensation to meet that acrid stench *inside* my own home. This is new. Prior to 2025, I had not had this experience. It is hard to escape the stench and toxic cocktail of chemicals when there's no where else to go!

**The smell that is not the most disconcerting aspect of this experience...**it is knowing that the landfill stench is caused by dangerous chemicals and that methane is highly flammable.

Methane itself is odorless. However, when methane is released into the atmosphere, methane is accompanied by other **toxic pollutants**. These chemicals have serious health impacts, primarily on the lungs and immune system.

Why Coffin Butte landfill gas stinks:

**Hydrogen sulfide [H<sub>2</sub>S]:** Rotten-egg smell. Even low concentrations cause eye irritation, sore throat and cough, nausea, shortness of breath, and fluid in the lungs.

Long-term, low-level exposure can cause headaches, dizziness, and memory issues. Coffin Butte landfill gas has about **8 parts per million by volume**.

**Methyl Mercaptan [CH<sub>3</sub>SH]:** Bad fart smell / asparagus-pee smell, also produced by pulp mills. Detectable by humans down to 1 part per billion. **Coffin Butte landfill gas has 2300 times that level.**

**Isopropyl mercaptan [C<sub>3</sub>H<sub>8</sub>S]:** Skunk smell, extremely pungent. **Coffin Butte landfill gas has over 2 parts per million by volume.**

**Dimethyl sulfide [(CH<sub>3</sub>)<sub>2</sub>S]:** Rotten cabbage smell, also what you smell if a batch of home-brew goes bad. **Coffin Butte landfill gas has about 2 parts per million by volume.**

#cleanair #corvallis

**In addition, methane is highly flammable.** Methane mixed with air can be an explosive combination. A disconcerting thought given that the nature of our region is bucolic meadows and forests as well as agricultural lands.

## Odor Complaint

When I report the bad and very bad days to the State of Oregon Department of Environmental Quality (DEQ), my complaint is acknowledged by the Permitting and Compliance Specialist -- Air Quality. She informs the Coffin Butte Landfill's Environmental Manager, and he sends a response about what they noted on that day. ***Our odor patrol on the Xth at XX am did not detect anything. It includes driving out Soap Creek Road. All landfill systems were operating normally that day. Let me know if you have any questions.*** Everyone who submits a complaint receives a message along this theme.

## Odor Patrol?

They drive around trying to smell the landfill stench?

**Olfactory fatigue** occurs when the olfactory receptors in the nose become desensitized to a noxious smell after being exposed to it for a long time. The nose filters out what it considers "background noise." This is a physiological response and cannot be overridden. When this happens, the person can no longer smell the landfill stench. Even if they have a number of people on Odor Patrol, working anywhere near the landfill has likely changed their ability to smell the stench.

**Geographic range.** How does the Odor Patrol know where to check for landfill stench. Do they only check when they smell it? Is it a daily operation? At what time of day? Are they constantly on the move? Where do they focus? We've heard of

landfill stench complaints from people driving by the landfill on 99W as well as from people in North Corvallis, which is 8-12 miles away, and on Hwy 20 south of town.

**Altitude.** It's not enough to just measure the smell at ground level. Plumes of methane have been reported from drone / flight data. How is the Odor Patrol accounting for altitude? Based on reports by neighbors, I know that someone high on the ridge directly across Soap Creek from my property smells the landfill stench on days I don't smell it on the valley floor. There can be pockets of stench that would be hard to isolate while driving around.

**Weather patterns and air currents** may mean that they don't smell anything at the landfill, because the wind patterns send the methane mixed with dangerous chemicals up into the atmosphere. When those particles come back down, they can be miles from the landfill and the Odor Patrol.

### "All landfill systems were operating normally."

My nose tells me that I have landfill stench *inside my home*.

The Republic Services claims the landfill systems were *operating as they should*.

Something doesn't compute.

**Without third party methane measurements, this rapidly becomes a "he said/she said" situation.**

### If the landfill systems are working, then why are the neighbors in the area regularly impacted by the landfill stench?

- Are there leaks that the landfill operators are not aware of? This is likely based on recent EPA reports about large methane plumes above and around Coffin Butte Landfill that were never reported by the landfill operators.
- Are they just measuring methane on part of Coffin Butte Landfill? What's happening on the **47% and 38% of the landfill that has been deemed exempt from monitoring?** [Please read about the findings in the following article that will shed more light on this sentence.](#)

In an article entitled: **Oregon corporate landfills using loophole to avoid methane monitoring, study finds**, [Tracy Loew](#) of the Salem Statesman Journal reports: (the following italicized excerpts were taken directly from this article):

*Oregon's corporate-owned landfills are using a loophole in state law to avoid methane monitoring on an average of about half of their operating surfaces, a new study concludes.*

*County-owned landfills, meanwhile, are exempting an average of 10% of their surfaces, according to the [report released Thursday](#) by the Eugene-based environmental group [Beyond Toxics](#). (That 37 page report: OREGON'S SECRET CLIMATE KILLERS: Pulling Back the Curtain on Hidden Landfill Methane Emissions. March 2025. Authors Mason Leavitt, Lisa Arkin.*

*The rules require quarterly monitoring of the landfill, by walking the surface with a handheld gas analyzer. Identified leaks measuring over 500 parts per million must be fixed within 10 days.*

*The rules allow landfills to use “alternative compliance options,” including changing walking paths, to exclude monitoring where there are potential safety and other issues, such as steep or slippery slopes and physical obstructions.*

*Mason Leavitt, data analytics specialist for Beyond Toxics, said companies appear to be abusing that exemption.*

*For example, the 178-acre Coffin Butte Landfill, near Corvallis, exempted 40 acres in the third quarter of 2022 and 30 acres in the fourth quarter of the same year, citing “high vegetation,” according to the report. The landfill continued to exempt those areas in 2023 without citing a reason.*

*The researchers determined the percentage of each landfill that was unmonitored each quarter. Coffin Butte Landfill, near Adair Village, operated by Republic Services: Between 53% and 62%.*

### **U.S. EPA finds problems with methane monitoring**

*Beyond Toxics' conclusions mirror those in a recent U.S. Environmental Protection Agency [report](#).*

*More than 100 EPA inspections over the past three years found that many municipal solid waste landfills across the country were not properly monitoring emissions.*

*“While the regulations allow municipal solid waste landfills to exclude certain areas from the surface emissions monitoring (e.g., areas with steep slopes or other dangerous areas), the **EPA observed during recent inspections that areas that are not dangerous are improperly excluded from monitoring,**” the EPA report states.*

*“If a municipal solid waste landfill excludes areas from the surface emissions monitoring, the facility should document and explain the basis for excluding each area from monitoring in the surface emission design plan and SEM reports. The regular side slopes of the landfill may not be excluded from monitoring per the regulations,” the report reads.*

**Coffin Butte Landfill was among those the EPA inspected.**

[\(https://www.statesmanjournal.com/story/tech/science/environment/2025/03/06/oregon-landfills-methane-monitoring-loop-hole-study/81163394007/\)](https://www.statesmanjournal.com/story/tech/science/environment/2025/03/06/oregon-landfills-methane-monitoring-loop-hole-study/81163394007/)

Furthermore, we need third-party methane measurements using drone equipment and satellite imaging. Wouldn't it be helpful for Republic Services, DEQ, EPA < surrounding counties, and the residents to:

**Know how much danger we are in due to methane with dangerous chemicals mixed in** - health impacts, fire danger, greenhouse gases that contribute to climate change, etc

To know **the extent of the leaks...and more importantly, where to fix those leaks.**

To know the **emissions in the entire plume**, not just at ground level.

**To reiterate, these measurements MUST BE monitored by neutral third party entities.** Based on numerous instances in the past, we cannot rely on the Applicant's ability to accurately measure and report what is happening at Coffin Butte

From the same article referenced above:

*In 2022, the EPA found **Coffin Butte** was leaking methane at levels that exceed state and federal limits and what the landfill had publicly reported.*

*EPA investigators returned in 2024 and found more than 40 locations where methane exceeded limits, including at holes in the cover material.*

*EPA, rather than DEQ, is continuing to lead that investigation, Darling said.*

**Expanding the landfill will dramatically increase the methane / dangerous chemicals production and influence the frequency of the landfill stench.** As the landfill moves to different cells, different neighborhoods will be more impacted. **I believe the landfill stench I smelled *inside my house* had to do with Republic Services rounding a corner to dump trash in a new cell that is more aligned with where my property is.**

**I strongly oppose Republic Services' Conditional Use Permit application LU-24-027 to expand the Coffin Butte landfill. I urge the Planning Commission to deny this application.**

**As noted above: The Applicant's** proposed use seriously interferes with my use of my property, just four miles from Coffin Butte, seriously interferes with the character of Soap Creek Valley area and beyond. [Benton County Code 53.215 (1)]

Between the toxic landfill stench, the flammable methane, and the Applicant's loose, reckless, and blatant disregard for State and Federal laws, measuring protocols, and reporting standards, do we know what's actually happening at Coffin Butte Landfill.

**We are ALL at risk** of health issues, catastrophic fires, dangerous air quality, and deadly water quality – in Benton County and the counties and residents that surround the landfill and drink water tainted by disposal for the toxic leachate. Our lives and the character of our area could easily be irrevocably changed with a spark, breathing the air, or drinking the water!

**I appreciated the questions the Planning Commissioners asked during the first night of the hearing. Please continue to ask deep, detailed, and pointed questions to surface the essential details of this situation.**

Respectfully Submitted

Carol McClelland Fields, PhD  
37326 Soap Creek Road, Corvallis, OR