

From: [Virginia Scott](#)
To: [Benton Public Comment](#)
Subject: Please enter the the information below into the record for LU-24-027:
Date: Wednesday, June 11, 2025 2:11:44 PM
Attachments: [Fire Risks from Landfill Expansion Uptated Testimony.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Attached is updated Fire Risk Testimony. The attached document included additional photographs and fire details, date corrections, and is submitted in a form that will allow searching in the testimony documentation. Please include this document in the public record for LU-24-027.

Virginia Scott • 37016 Soap Creek Rd • Corvallis, Oregon 97330

Benton County Planning Commissioners c/o Planning Division

4500 SW Research Way, Corvallis, OR 97333

June 11, 2025

RE: LU-24-027 Conditional Use Permit Application Regarding Landfill Expansion: Fire

Dear Chair Fowler and Members of the Benton County Planning Commission:

Thank you for the opportunity to comment on the Conditional Use Permit (CUP) application submitted by Valley Landfills Inc., which proposes to start what amounts to a new landfill on the north end of Tampico Ridge, south of Coffin Butte Road.

My comments focus on the risk of fire to our local communities, homes, recreation, wildlife, industry, business, property, and wellbeing of our Adair Rural Fire & Rescue posed by the Coffin Butte Landfill.

In Exhibit 20_Fire Risk Assessment for Coffin Butte Landfill the applicant has outlined five fires since 1999 and identified three possible sources of landfill fires that have a material chance of ever developing at the Landfill. These include (1) working face fires, (2) grass fires, and (3) gas well fires. They have declared that there have been no fires in the surrounding area. And have outlined their plan to address and handle fires that do occur.

In the supporting document, I show that there is a distinct mismatch between the E20 report and the data provided by Adair Rural Fire and Rescue (ARFR), which records 28 fires between 2013 and 2025. Adair Rural Fire & Rescue has responded to 28 calls to the Landfill, 17 to the Republic Services Pacific Region Composting (PRC), 111 to fires near the Coffin Butte Landfill, and 195 to Motor Vehicle Accidents (MVA) near the landfill. I question whether any of the

fires that involved ARFR, or the ones that were handled internally were reported to the DEQ as their Operations Plan states.

I also show additional fire risks that are not accounted for in the E20, and show that Republic Services does not have a thorough plan to monitor and address fires, especially after hours, where they rely on the public for monitoring and volunteers for fire suppression.

The applicant drastically under represents the severity, number and types of fire risks to individuals and property in the area and yet asks you to approve their CUP. Exhibit 20 does serve as a useful example of how the applicant handles legitimate fire risk concerns that have been raised by local residents.

As I detail in my attachment to this statement, the applicant's arguments are dismissive at best. The fact that they have included this Exhibit as part of their application casts doubt on the entire application, and gives you further grounds to deny.

Sincerely,

Virginia Scott

Benton County Planning Commissioners c/o Planning Division

4500 SW Research Way, Corvallis, OR 97333

April 29, 2025

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Sincerely,

Virginia Scott

In 2024, Oregon's Governor invoked the Emergency Conflagration Act and Oregon was in a state of emergency due to the 2024 wildfires. These wildfires were exacerbated by the dry environment that is a result of global warming. Oregon called on its mutual assistance teams around the country to help us with fighting these wildfires. When the 2024 season finished, we had lost a record number of acres to fire. As we know the cost of firefighting and recovery from wildfires is massive and it costs lives, like the 2024 death of single-engine air tanker pilot James Bailey Maxwell. We also know that many of our Wildland firefighters have lost their jobs.

In addition, Oregon Health Authority is reporting record numbers of heat related deaths due to climate change, including 14 since July 5, 2024. The Climate and Health in Oregon report for 2023 reminds us that extreme climate effects continue and that we must build resilience against wildfire, drought and extreme heat. It seems that reducing methane release from Coffin Butte would be more effective than building resilience to the effects of methane releases. An expansion of the landfill will only result in more methane, not less.

This methane release is causing losses in human life, environmental losses, fire losses and expenses, and these are not limited to our county. These effects are cumulative across our state, our neighbor states, and have worldwide implications that often fall on those least able to adapt to them.

An expanded landfill is an additional fire risk to our community and to Benton County. BCC 53.215 (1) A landfill fire sweeping through the area will seriously interfere with uses on adjacent property, (e.g. the destruction of the homes that we live in, the research forestry in McDonald Forest, the commercial forestry in Starker Forest, agriculture like Anderson Blues, the recreational hiking and horse trails at the Lewisburg Saddle, the Old Growth Trail, the Sulphur Springs Trails, E.E. Wilson Wildlife Area, Peavy Arboretum, etc.) If fire sweeps through the area it will seriously interfere with the character of the area, (e.g. the loss of the historic oldest standing one room schoolhouse in Oregon, and much like the destruction along the scenic McKenzie River highway (below):



Before



After

An expanded landfill is an additional fire risk to our community and to Benton County. BCC 53.215 (2) will impose an undue burden on public improvements, facilities, utilities, or services (e.g. the Adair Rural Fire And Rescue Substation in the Soap Creek Valley, utilities (e.g. in that the toxic smoke from a landfill fire will contaminate water lines and wells that residents depend on, (as happened in the recent LA fires)), or services in the area (e.g. Adair Village Schools).

Per BCC 50.015: 5.9.4 the Soap Creek Valley is home to the endangered Calypso orchid, 5.1.2 The ecological health would be irreparably damaged by the toxic smoke from a landfill fire particularly if it burns for years. 5.2.1 Soap Creek is an important part of the Luckiamute Watershed and would become inhospitable to fish and other aquatic creatures if the cooling tree-cover were destroyed by fire.

Wildfire Hazard Map:

Property Owner's Report

Wildfire Hazard Class: **Low**

Within Wildland Urban Interface Boundary (WUI)? **Yes**

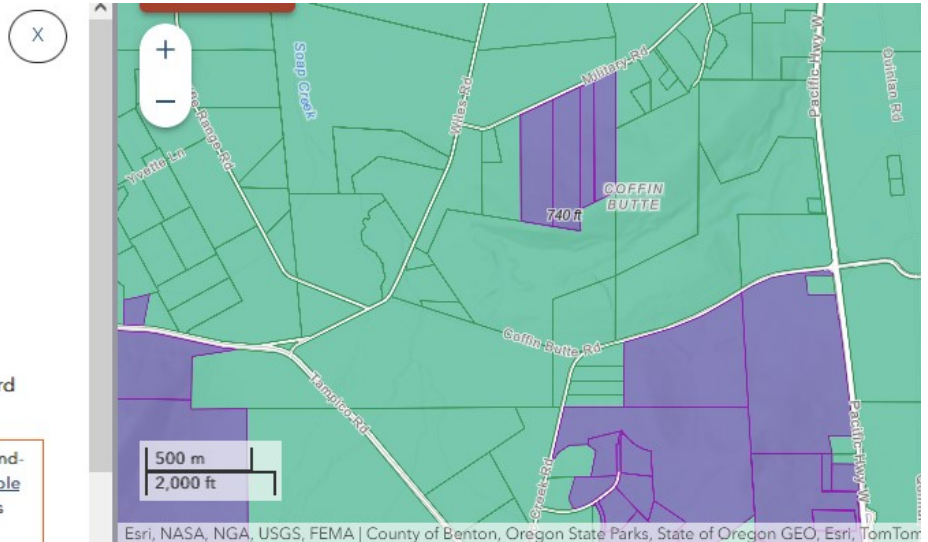
Wildfire Hazard Value: 0.001064



Low Moderate High

36.96% of properties in Oregon have a higher hazard value.

Only properties that are both high hazard and in the wildland-urban interface will be required to meet enhanced defensible space standards (ORS 476.392) and home hardening codes (ORS 455.612)



Burn probability
is the average annual likelihood that a specific location will experience wildfire.

Fire intensity
is the amount of energy produced by a fire, usually reported as "flame length."

To create the wildfire hazard map, OSU researchers combined two primary datasets – burn probability and fire intensity. Both were modeled across Oregon using the best available data and with the help of state and local fire professionals. Burn probability and fire intensity are based on four criteria:



climate



topography



weather



vegetation

Data regarding these criteria were combined with data from historical fires and simulations of 10,000+ plausible fire seasons, accounting for fire likelihood and intensity under everything from mild to severe fire weather.

Question: Why aren't any of the frequent Coffin Butte landfill fires included in the Benton County Wildfire Protection Plan (CWPP)?

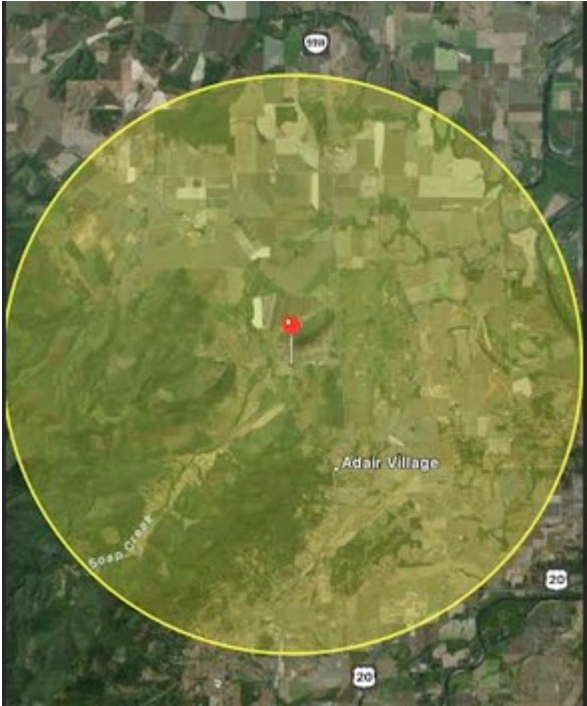
I am concerned that a landfill with documented explosive levels of methane would be considered for location in a parcel rated as Moderate risk land adjacent to residential homes.

The Wildfire Hazard Map takes into account climate and weather, both of which are changing dramatically (perhaps accelerated by the massive unmitigated methane release from the landfill). It also factors in vegetation. It does not factor in explosive levels of methane, equipment fires, composting material, or battery fires, for example, which I believe make the current map misleading.

August 6, 2024 – At the Benton County Board of Commissioners (BoC) meeting, Republic Services reported to the BoC that they used the Covanta ash as daily cover because they do not have soil available for the daily cover, yet in the E20 Fire Risk Report the operating procedures state that 12" of soil is used for intermediate cover, 6" of soil is used for daily cover and that "Soil stockpiles arranged in a U-shape are always available near the Landfill working face in accordance with Standard Operating Procedures (SOPs) developed by Republic Services corporate staff for all their landfills nationwide." This seems to be conflicting information.

Question: Is there soil available at Coffin Butte or not?

Five Mile Radius Around Coffin Butte Landfill:



Reports by the Institute for Home and Business Safety (IBHS Research Center) are finding that embers from wildfires can travel on the wind up to five miles in front of a fire. They ignite structures, trees, or landfill trash that then produces their own embers that can travel another five miles. These embers jump fire breaks in high wind situations.

I attended a webinar called Cascadia Wildfire and Urban Smoke. One of the hosts shared some film snippets and insights that are from the “Inside the LA Firestorm” documentary that recently aired on PBS. In that training, the film teams showed footage of the high LA winds blowing open trash can lids, the contents of which ignited from the wind born embers, and produced their own ember storm that ignited homes. I can only imagine the ember storm produced by a mountain of trash vs. the contents of an individual trash can.

During this same webinar the fire experts were explaining that in a wind event with fire, extinguishing the fire is not a matter of “putting the wet stuff on the red stuff” because when spraying water in high wind, the water dissipates before it ever reaches the fire. The E20 reports that “The site can readily use water to extinguish grass fires on the landfill or to supplement soil application at the landfill working face. The site has a 4,000-gallon water truck with spray bar and hose attachment that is used routinely in dry weather for dust control. The water truck is loaded with fresh water from a truck-loading station connected to the public water supply.” Even if there is a 4,000 gallon truck (this should be verified independently), it will not be sufficient or effective in a wind event with fire to extinguish a blaze.

The E20 goes on to say “Other control measures could be employed, such as firebreaks and soil barriers, to keep such fires off the Landfill property.” Another important point made during the webinar by fire experts was that firebreaks are not effective at stopping wind events with fire as the embers can travel up to five miles on the wind ahead of a fire.

We need to consider the risks of fires started outside the Coffin Butte Landfill, whose wind driven embers ignite the trash and/or explosive methane plumes at the landfill, that then blow into MacDonald and Starker forests, Adair Village, Soap Creek Valley, the Vineyard Mountain community, Lewisburg, North Albany, Airlie Road, Suver crossroads, Peavy Arboretum, Springhill Drive, Tampico Road community, etc. From there the ember storms can jump another five miles reaching Monmouth or Corvallis, Albany and Millersburg. A larger landfill is a larger target for airborne embers.

And we need to consider fires originating at the landfill from: pyrophoric materials (e.g. lithium ion batteries), automobile batteries crushed by landfill equipment, hot loads that ignite landfill contents, heavy equipment fires, underground fires from composting, lighting strikes, methane explosions, etc. Ember storms from these fires could be blown out as far as five miles and reach the same areas listed above.

Landfill Fires:

Coffin Butte catches fire regularly. In order to approve the expansion you must judge that the expanded landfill will **not** significantly increase the fire hazard, increase the suppression costs, or significantly increase risks to people engaged in fire suppression. The landfill runs counter to all of these concerns and values, by consuming firefighting resources that could be used to protect our residents, increasing costs to the community that supports our Adair Rural Fire and Rescue and the other stations that provide them mutual aid, and seriously risks the lives and health of our largely volunteer department and the lives of the Republic Services employees. Now combine this proclivity to catch on fire with the explosive levels of methane detected in leaks across the landfill property and we have some very concerning situations.

The E20 – Fire Risk Assessment Report Prepared by James J. Walsh, P.E., BCEE, lists only five fires since 1999 as reported by Republic Services. There is a distinct mismatch between the report and the data provided by Adair Rural Fire and Rescue, which records 28 fires between 2013 and 2025. The five fires identified in the report are included below with the preface of “E20 – Fire Risk Assessment Report”.

The table below is a summary of the Adair Rural Fire & Rescue calls responding to the Landfill (28), to the Republic Services Pacific Region Composting (PRC) (17), to fires near the Coffin Butte Landfill (111), and to Motor Vehicle Accidents (MVA) near the landfill (195)

Question: Does the County know how many of these MVAs involve Republic Service’s vehicles?

Year	Landfill Fire	PRC Fire	Nearby Fire	MVA
2013	4	5	3	18
2014	2	1	7	22
2015	2	0	6	23
2016	3	0	7	17
2017	0	1	5	17
2018	4	2	5	21
2019	2	2	6	11
2020	1	0	12	9
2021	3	0	17	8
2022	0	2	8	17
2023	2	0	13	8
2024	5	2	11	12
2025	0	2	11	12
Total	28	17	111	195

It would be truly unfortunate if after all the work on the CWPP, if the fire that starts and burns peoples' homes down ends up starting at the landfill, which is the single place in Benton County where more fires have started over the past 50 years than any other single place in Benton County.

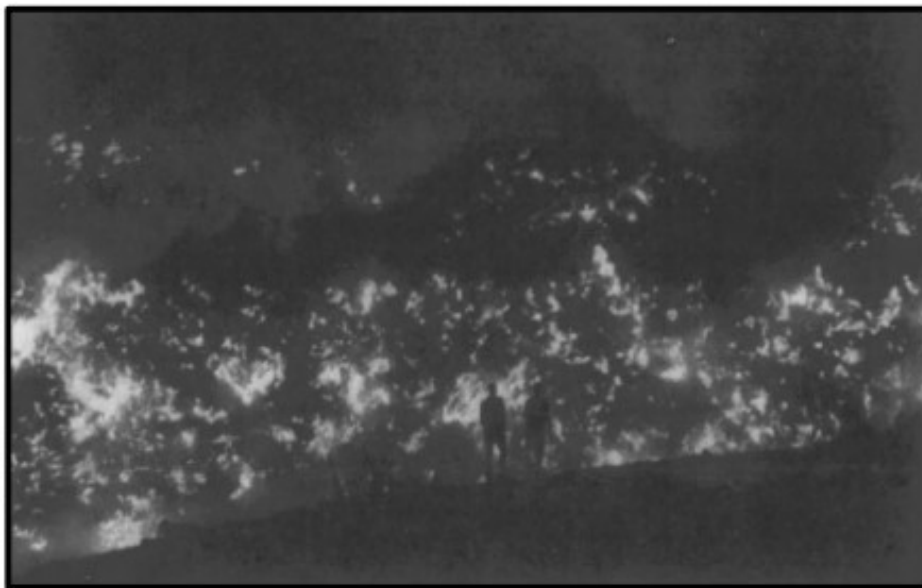
Reported by a former Republic Services Engineer:

Equipment fires which smoldered for days were a common occurrence. They were often caused when trash gets inside the engine compartments on the D9 dozers and packs around the turbos, causing the trash to start to smolder. This is so frequent an occurrence, that no reports were kept except on equipment repair orders, which only noted the nature of the damage being repaired. [This means no calls to the Adair Rural Fire and Rescue and no reports to DEQ.] The procedure was to pull equipment out of the trash and hose out the engine compartment where the trash had packed and caught on fire. Stir up the embers, hose them down, and if the equipment was still operational (note I did not say safe), put it right back into the trash.

E20 – Fire Risk Assessment Report: The first notable fire at the Landfill occurred in 1999 and was its [the] largest fire to date, as reported in local media at the time. The site was owned and operated by Valley Landfills Inc., before site ownership and operation was assumed by large national waste companies—Allied Waste and Republic Services. The fire broke out in the exposed waste area of the daily working face and reportedly came from an undetected hot load from a large waste-transfer trailer known as a “waste tipper.” Apparently, the fire was not spotted and/or responded to quickly enough and spread over the full extent of exposed waste surfaces. It reportedly expanded beyond exposed waste and burned some grass atop the Landfill and also burned and melted some of the above-ground plastic pipe serving as landfill gas headers.

On August 24, 1999, at around 6:30 pm, the landfill caught fire. This fire, large enough to be covered by the Associated Press as national news, burned for more than 24 hours, prompting fire crews from Adair Village, Corvallis, Albany, and Polk County to respond. The Landfill’s owner said the blaze was caused by a ‘hot load’ delivered to the site. Corvallis Gazette-Times. August 25, 1999

Figure 6 - Karl Maasdam/Gazette-Times August 25, 1999. Permission to use granted by OWH News Archives and Licensing Manager.



E20 – Fire Risk Assessment Report: [Approx. 2018] - A second fire broke out at the Landfill’s working face about six years ago. The source of the fire is unknown, but was likely from a smoldering portion of a waste load delivered to the site during working hours. The fire went undetected during staffed daytime operations and broke through to the surface during the night and spread through some of the working face before it was observed by neighbors. Adair Fire quickly extinguished the fire with water.

E20 – Fire Risk Assessment Report: A third fire occurred on grassed areas adjacent to the Landfill flare. The cause of the fire is unknown, but site operators believe there may have been an ember from charcoal buildup in the flare that ignited grass. The incident occurred during the workday and was quickly extinguished by Landfill personnel. Since then, **the areas around the flare at the site have been covered with gravel. With this improvement, it is believed that a repeat of a fire starting in this manner cannot occur.** (The author of this report, having significant experience with landfill fires, has never heard of a surface fire starting from landfill gas flare. I am skeptical that the fire occurred from this source and believe this grass fire likely came from some other source.)

E20 – Fire Risk Assessment Report: A fourth fire was reported to have occurred on May 18, 2024. It is believed that a hot load was delivered to the working face from the public convenience center at the site. Although the subject waste was delivered during the operational day, it apparently was not an obvious hot load and on fire until after the site was closed that day. At about **6:00 pm** that day, a trail of smoke was seen rising from the working face of the landfill. The fire was reported to Adair Fire who mobilized to the site after first contacting site operating personnel. The site's Operations Manager and Operations Superintendent responded to the site within 15 minutes of contact from Adair Fire. Site personnel immediately used heavy equipment to extract the affected waste from the working face, moving it nearby to an area isolated from the waste at the working face. Site personnel then used the equipment to apply soil over the waste. The fire was soon extinguished. After that, the waste was observed for another hour, to ensure it did not re-ignite.

Adair Rural Fire & Rescue's Post

Adair Rural Fire & Rescue

[May 19, 2024](#)

At **7:04pm**, Saturday 5/18, Adair Fire was dispatched to a smoke investigation at the top of the Coffin Butte Landfill. Firefighters arrived to find burning trash damaging both hydraulic transfer truck lifts. The lift fires were quickly knocked down. We greatly appreciate the assistance from [Corvallis Fire](#) to send an additional fire engine and tender to help extinguish the trash. Landfill employees operating a dozer and backhoe were instrumental in the effort to completely put the fire out. Adair Fire was on scene for 1 hour and 25 minutes.





E20 – Fire Risk Assessment Report: A fifth fire occurred on July 24, 2024. A small fire ignited in a grassy area near the landfill’s flaring station. Again, the fire was observed from off-site and reported to Adair Fire. Adair Fire notified site operating personnel, who live nearby and mobilized to the site in 12 minutes. By then, Adair Fire had already extinguished the grass fire with water. The source of the fire is unknown. But since this event, the ground in a large area around the enclosed flare has had its grass removed and replaced by a gravel surface.

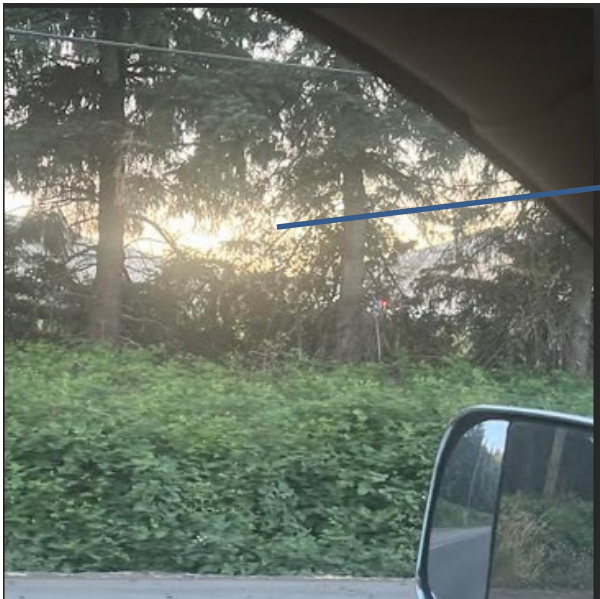
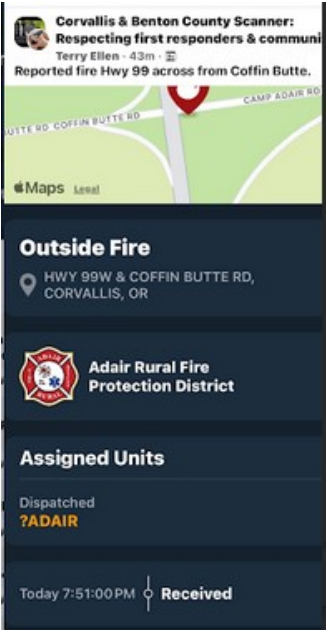
It is notable that Republic Services reported to the Fire Assessment team that they placed gravel around the flare after the earlier reported event and that “a repeat of a fire starting in this manner cannot occur”, but it clearly did.

Also of note is the fact that “The author of this report, having significant experience with landfill fires, has never heard of a surface fire starting from landfill gas flare.” And yet we have two such events in a matter of a year. This calls into question both Republic Services operations and preventative measures and the expertise of the author hired to write this report for the applicant.

OPB reported that on July 24, 2024 firefighters responded to a grass fire near a flare stack that burns off methane gas from the landfill.

Adair Rural Fire and Rescue was onsite prior to Republic Services response to this fire.

Photos below are from the July 24, 2024 Flare Fire:



Smoke is visible from the road by passing citizens.



There is a direct run of dry berry stocks out to the road and along the road leading directly to neighboring homes



Brush not gravel around tank and flares. Fire around tank and dry grass is concerning and a risk to nearby residences.



Brush, not gravel
surrounds tank and
flares.



This fire ended up burning over a quarter of an acre. If it had not been called in by a passing citizen, it had ample paths to quickly reach neighboring properties and forestland.



Above: Fence high dry grass surrounds and partially covers the Coffin Butte Landfill. An arsonist, a spark from a dragging chain, an ember from a nearby fire, a lightning strike, or a carelessly tossed cigarette could ignite the grass and the explosive levels of methane leaking from multiple sites across the landfill surface.

Possible Landfill Fire April 9, 2025 7:05 PM - A neighbor was out on E.E. Wilson Wildlife Area this afternoon. From the archery range she saw smoke or steam coming up, and a bunch of people working on the area with heavy equipment.

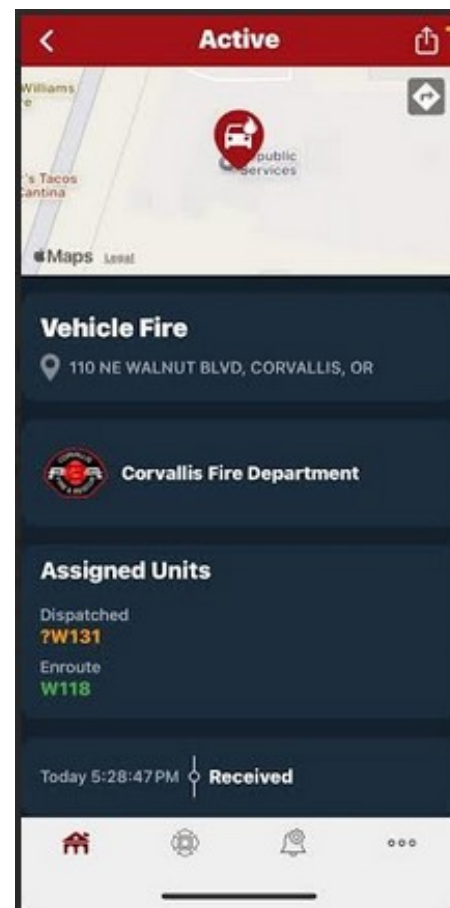
This possible fire was not called in to Adair Rural Fire and Rescue.

E20 Addendum - #12 states that bird deterrent flairs are not used at the landfill. There are recent witness accounts of bird deterrent flairs in use at the Coffin Butte landfill and they are being used in the presence of explosive levels of methane gas. This is alarming.

I have not seen any indication that proper PPE is available for the Republic Services staff, or an indication that they have been trained to use it properly to protect their health. This seems to be an undue burden on the employees.

I think that it is significant to note that many of these fires occurred after hours and the reporting mechanism was citizens driving by who call Adair Rural Fire and Rescue. This is a significant burden on the citizens in order to protect the area from fire. August 6, 2024 – At the Benton County Board of Commissioners meeting, Republic Services reported to the BoC Republic Services reported that they “do not have a way to monitor for fires after hours and that they rely on citizens and Adair Rural Fire and Rescue for monitoring and subsequent response. Republic Services was also asked if they have a mechanism to alert residents in the area in the event of a fire. Again, they said, “No, that they relied on Adair Rural Fire and Rescue to do the alerting. This is a serious burden on our local services.

Garbage Truck and Hot Load Fires:



April 6, 2025 5:28 PM – This fire occurred on Walnut in Corvallis.



The Sandalwood Fire in Riverside , CA– Occurred on October 10, 2019 when a garbage truck dumped a hot load into dry vegetation. This fire killed two people and injured 3, burned 1,011 acres, and destroyed 74 structures and damaged 16 others by the time it was extinguished.



Above is footage of the of the dump vehicle as it pulled off in the dry vegetation to dump its hot load.

Resources Assigned

<div>247</div> <div>Personnel</div>	<div>1</div> <div>Helicopters</div>	<div>17</div> <div>Engines</div>	<div>1</div> <div>Water Tenders</div>	<div>10</div> <div>Crews</div>
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Numerous firefighting air tankers from throughout the State are flying fire suppression missions as conditions allow.

Above are the resources assigned to address the Sandalwood fire. This constitutes a significant burden on utilities and services. This type of fire is not out of the realm of possibility here in Benton County, given Republic Services record.

Batteries and Other Items Cause Oregon Landfill Fires:

<https://kpic.com/news/local/car-battery-thrown-in-trash-sparks-wildfire-at-landfill-in-douglas-county>

OPB reported in October of 2023 on the growing risk of lithium battery fires in Oregon landfills. Lithium battery fires are particularly dangerous. If damaged, or if their contacts touch metal, they are particularly susceptible to thermal runaway. Lithium batteries can burn without oxygen because they create their own oxygen. The fire that they produce is considered a chemical fire and produces highly toxic fumes. They burn at temperatures in excess of 932 degrees F which can easily ignite surrounding material. They are exceptionally difficult to extinguish. Republic does not inspect the loads that come to the landfill. Lithium batteries in are everything now, including: electronic devices, like laptops

and phones, tooth brushes, hand tools, yard implements, handheld radios, battery backup power sources, etc. They are everywhere and they pose unique fire challenges and danger to firefighter, landfill personal, and area residents. E20 indicates that there is signage posted at the landfill, but they do not inspect their loads.

Question: What is Republic's plan to address this ever growing issue?

Car battery thrown in trash sparks wildfire at landfill in Douglas County

by News Staff

Thu, August 20th 2020 at 1:43 PM

Updated Fri, August 21st 2020 at 12:10 PM

The most recent fire was caused by an "an improperly discarded automobile battery that exploded and caught fire when it was run over by a trash compactor working in the landfill," the county said. Other items to watch out for include cell phones, home electronics, charcoal briquettes, wood stove ashes, cigarettes, propane fuel tanks and cylinders, fireworks, explosives, radioactive materials, lighters, oil, oil soaked rags, chemicals and cigarettes. (Douglas County)

ROSEBURG, Ore. - When you throw something away in Douglas County, it goes to the landfill. And when what you throw away is flammable, it can set the landfill on fire. That's been the case in the past - and this week - at the county landfill.

"We have experienced landfill fires in the past and after identifying the causes, we know that most of the fires could have been prevented with a little help from our residents," Douglas County Commissioner Tom Kress said. "So, we are asking residents to take a little extra time to separate and properly dispose of flammable and combustible materials, and make sure that hot waste items are cooled and contained before they place them in a garbage can or dispose of them at a transfer station."

According to the county:

Landfill fires are especially dangerous, not only with the potential to start a wildfire on neighboring lands, but also because they can cause injury to employees and fire crews, and they can emit dangerous fumes from the combustion of the wide range of materials contained within the landfill.

Luckily, the recent fires were quickly contained by staff at the landfill, which prevented the spread to the nearby hill sides.

"It is extremely dangerous for our solid waste staff, as well as fire crews to fight fires at a landfill," said Gabe Forrester, manager of the Douglas County Solid Waste Division. "Between navigating the steep terrain with fire equipment, preventing the spread of fires to neighboring lands, enduring the extreme heat caused by combustible materials and avoiding potentially toxic fumes, there is an incredible safety and health risk."

The most recent fire was caused by an "an improperly discarded automobile battery that exploded and caught fire when it was run over by a trash compactor working in the landfill," the county said.

Other items to watch out for include cell phones, home electronics, charcoal briquettes, wood stove ashes, cigarettes, propane fuel tanks and cylinders, fireworks, explosives, radioactive materials, lighters, oil, oil soaked rags, chemicals and cigarettes.

The county offered these tips for handling potentially flammable waste:

Lithium-ion and Lithium-polymer Batteries: These kinds of batteries are commonly found in cell phones, tablets, notebooks, computers, RC cars and other electronic children's toys. Locally you can recycle these at Lowes and Batteries Plus Bulbs. Additionally, Batteries Plus Bulbs and Call2Recycle will accept alkaline, rechargeable, dry/wet cell and miscellaneous batteries. For all other electronics that contain batteries, the closest location for disposal is at the Lane County Hazardous Waste Collection Center - Glenwood Transfer Station, 3100 E. 17th Ave. in Eugene. Please remove the batteries and do not place these items with your regular refuse or in garbage bags.

Cell phones, Tablets, Notebooks and Computers: Most cell phones or tablets can be recycled or traded-in with your phone service provider, or at an ECO-ATM kiosk located inside your local Wal*Mart, Safeway and Fred Meyer stores buy or recycle them for you. You can also contact the local Lions Club or Call2Recycle for local locations that recycle these items. For all other communication devices that contain batteries, the closest location for disposal is at the Lane County Hazardous Waste Collection Center - Glenwood Transfer Station, 3100 E. 17th Ave. in Eugene. Please remember to remove batteries and do not place these items with your regular refuse or in garbage bags.

Electronics and Televisions: Sunrise Enterprise locations will accept most home electronics, including computers and TV's for recycling. For all other electronics, the closest location for disposal is at the Lane County Hazardous Waste Collection Center - Glenwood Transfer Station, 3100 E. 17th Ave. in Eugene. Disposal is by appointment only, so please call for more information and to make an appointment, (541) 682-4120. Please do not place these items with your regular refuse or in garbage bags.

Auto and Boat Batteries: The Douglas County Landfill and All Transfer Stations will accept auto and boat batteries for recycling. Or you can typically trade in these kinds of batteries and receive a core credit or discount on your next battery purchase at a local store. Call local stores and inquire about "take back" or other recycling options. Please do not place these items with your regular refuse or in garbage bags.

Charcoal Briquettes, Coals and Hot Ashes: Close the lid and vents to your charcoal grill for 48 hours until ash has completely cooled. Soak ash with water to reduce potential for combustion. Place the completely cooled ash in a plastic bag or in a plastic container before placing it in a non-combustible garbage bin for disposal. The same method applies for the proper disposal of cigarettes, fireplace ashes or fire pit coals. Make sure the coals, briquettes and ashes are completely cooled and dead out for disposal. Please do not place hot waste items with your regular refuse or in garbage bags.

Propane Tanks: The Douglas County Landfill and All Transfer Stations will accept propane tanks for recycling with the valves removed. Or you can call the retailer where you purchased your propane tank, and inquire about "take back" or other recycling options. Please do not place these items with your regular refuse or in garbage bags.

Used Fireworks: Submerge used fireworks in a bucket of water and soak overnight. Wrap soaked fireworks in plastic so they do not dry out and place in a non-combustible garbage bin before disposal. Unused fireworks cannot be thrown away in your regular garbage. Please contact a hazardous waste collection center for disposal information.

Explosives and Radioactive Materials: Explosives and radioactive materials cannot be thrown away in your regular garbage. Please do not place these items with your regular refuse or in garbage bags. Please contact a hazardous waste collection center for disposal information.

Lighters, Oil, Oil Soaked Rags and Chemicals: Lighters, oil, oil soaked rags and chemicals cannot be thrown away in your regular garbage. Please do not place these items with your regular refuse or in garbage bags. Please contact a hazardous waste collection center for disposal information.

Smoking or Vaping: A safety reminder that Smoking or Vaping is not permitted inside the gates of the county landfill or at any of the County Transfer Station locations. Please do not place lit cigarettes or flick hot cigarette butts into our disposal bins or throw them away with your regular refuse or garbage bags.

Lightning:

What happens if one of the 2000 lightning strikes that Oregon experienced between Wednesday July 17 and Sunday July 21, 2024 randomly hit a particularly explosive methane release? These fires endanger the life and safety of our firefighters, and are likely to blow embers and toxic plumes into residential neighborhoods. Embers are the leading fire ignition source in a fire. As stated above the embers can travel on the wind up to five miles in front of a fire.

Lightning is capable of igniting methane above ground and it is also capable of igniting pockets of methane deep within the ground.

Lightning strike causes methane fireball

A food waste plant erupted in a ball of flames after it was struck by lightning near Wallingford, Oxfordshire, at 17:20 BST on Thursday.

It ignited the methane gas stored inside.

Eyewitness Emma Shepperd said: "I was trying to film the lightning, and looking out the window, and it struck the top end - that's when it caught fire."

Subsection [Oxford](#)

Published 17 June 2016



Oxfordshire Methane Explosion <https://www.youtube.com/watch?v=VQ75SUv8yVU>

Lightning strike causes huge explosion at Oxford recycling plant

Witnesses report large 'fireball' in sky at Severn Trent Green Power facility but no one is thought to have been injured in

the blast

[Donna Ferguson](#)

Mon 2 Oct 2023 17.33 EDT

A lightning strike at a recycling plant in Oxford caused a huge gas explosion and local power outages.

Eyewitnesses reported hearing a loud bang and seeing a “fireball” lighting up the sky.

Emergency services are attending the scene, but a representative from Severn Trent Green Power told the PA news agency that no one was injured in the incident.

Video and images shared on social media show a pyramid of flames on the horizon, inside a yellow and orange mushroom-like shape.

Severn Trent Green Power confirmed that biogas from a container had ignited at its Cassington AD Facility, near Oxford airport, at about 7.20pm and it was working with emergency services to secure the site.

The facility processes more than 50,000 tons of solid and liquid waste each year.

Ana Cavey, who lives in Somerton, about 15 miles north of Oxford, told Sky News: “We’ve had the most unbelievable thunder and lightning storm ever ... it came out of nowhere and the noise was incredible.”

She said her power had been cut off for most of the evening and has only just come back on.

Another witness told the Oxford Mail they saw a “strange pulsing sky out of our windows”.

Power outages have been reported in Witney, Burford, Chipping Norton and Milton-under-Wychwood, according to the BBC.

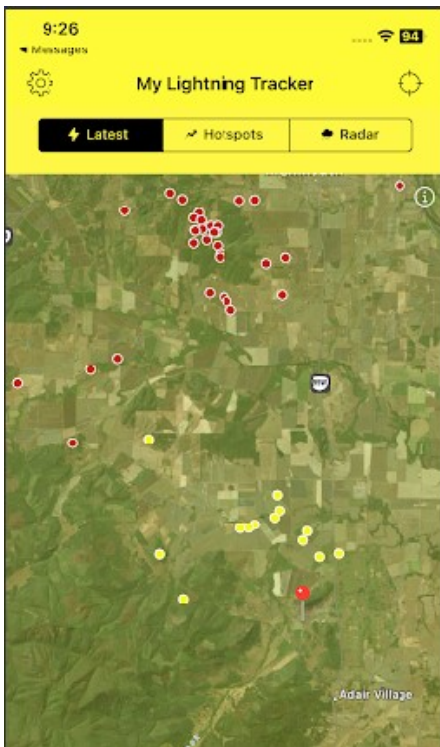
Other witnesses reported seeing “orange lightning” and hearing what sounded like a car crash outside their home. “The sky was glowing for about two minutes and then it just disappeared,” one person wrote on social media.

A statement from Thames Valley police said: “Our officers are currently at the scene of a fire at a waste plant near Yarnton, [Oxfordshire](#).

“It is believed that lightning struck gas containers at the site during bad weather this evening, causing a large fire.”

The Met Office had issued a yellow weather warning for thunderstorms in Oxford on Monday evening.

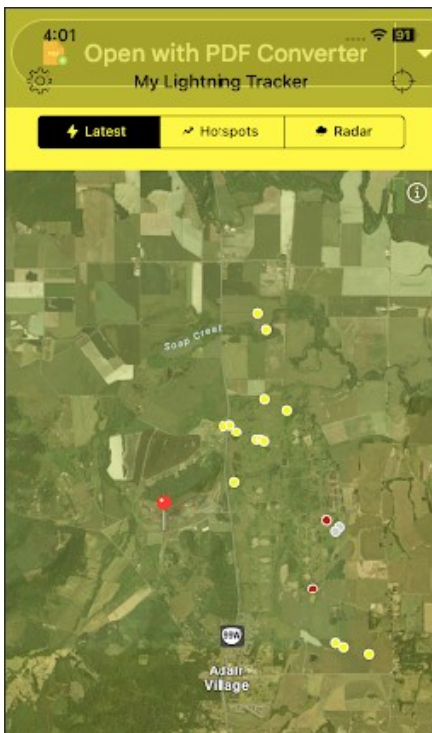
The following are records of lightning strikes in and around the Coffin Butte Landfill:



Above: August 17, 2024 9:26 AM Red Pin is Coffin Butte

Red dots lightning strikes less than 30 minutes ago

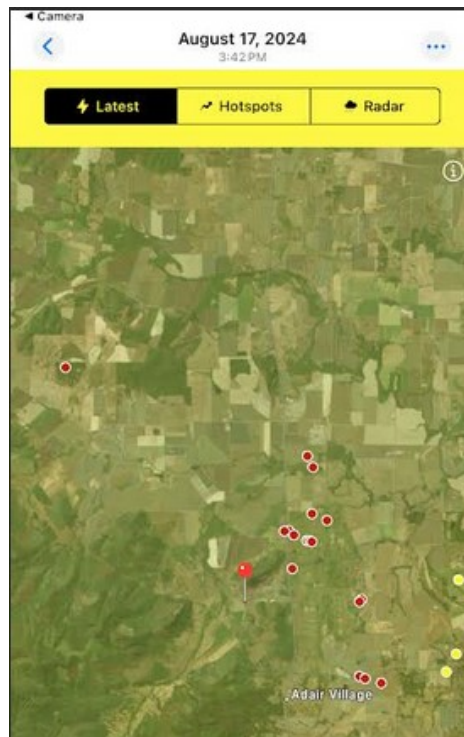
Yellow dots are lightning strikes over 30 minutes ago



August 17, 2024 4:01 PM Red Pin is Coffin Butte

Red dots lightning strikes less than 30 minutes ago

Yellow dots are lightning strikes over 30 minutes ago





September 6, 2024 8:24 PM Red Pin is Coffin Butte
 Red dots lightning strikes less than 30 minutes ago
 Yellow dots are lightning strikes over 30 minutes ago

Vegetation Fire:

E20- Fire Risk Assessment states: The risk is low for wildfires starting off site to come on site, and there is no history of wildfires in the area of the Landfill. And yet there were 111 nearby fires recorded by Adair Rural Fire and Rescue between 2013 and 2025.

Story updated at 8:20 p.m. on Friday, Sept. 9, 2022

A significant grass fire in South Salem that brought evacuations to the Vitae Springs Road South area has been surrounded by firefighters but has not been fully contained, officials said Friday night.

The fire was reported at 4:02 p.m. and spread in the area south of Vitae Springs Road.

Salem emergency manager Greg Walsh said fire crews would remain on the fire and nearby through the night and until any danger has passed.

"It's in a very difficult-to-access area," Walsh said, adding that the **dry weather, high heat and expected winds of 25 mph tonight are reason for concern.** "The fire is still ongoing. We cannot get to all of it. We have crews out there essentially surrounding it, but not containing it."

This fire was 18 miles away from Coffin Butte Landfill with 25mph winds and could have reached the landfill in less than 1 hour in a high wind event situation.

Rural firefighters urge caution during hot weather after grass fire near Adair Village

By: Robert Desaulniers Jul 4, 2023 Updated Jul 4, 2023



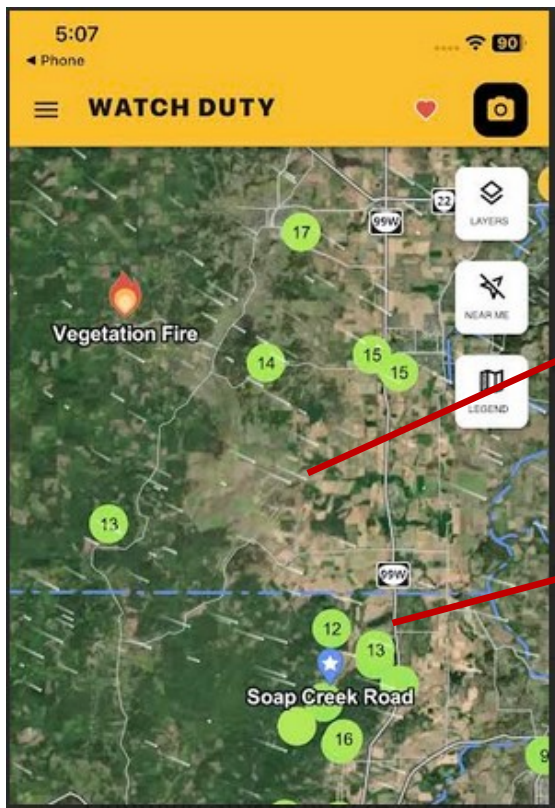
July 2, 2023

ADAIR VILLAGE, Ore. — A small pump house was lost but nobody was injured in a grass fire near Coffin Butte Landfill early Sunday morning, according to Adair Rural Fire and Rescue.

According to firefighters, crews responded to a reported grass fire on Wiles Road near the Knife River Quarry and Coffin Butte landfill at about 12:45 a.m. on July 2. Adair Rural Fire said crews arrived to find a grass fire that was rapidly spreading, and covered a total of about 1.5 acres. Firefighters said they were able to contain the fire before it did any damage to a nearby home, trailer and barn, but a pump house was unable to be saved. Firefighters said there were no injuries, but the cause of the fire is not yet known.



Firefighters said the fire didn't spread far because it happened at night when temperatures were relatively low, humidity was relatively high, and wind was calm. **Adair Rural Fire and Rescue said that if the fire had started during the day, when it was hot and windy, it could have been much worse.** Adair Village firefighters joined fire officials all over the state in urging extreme caution during Fourth of July celebrations and on the hot days still to come.



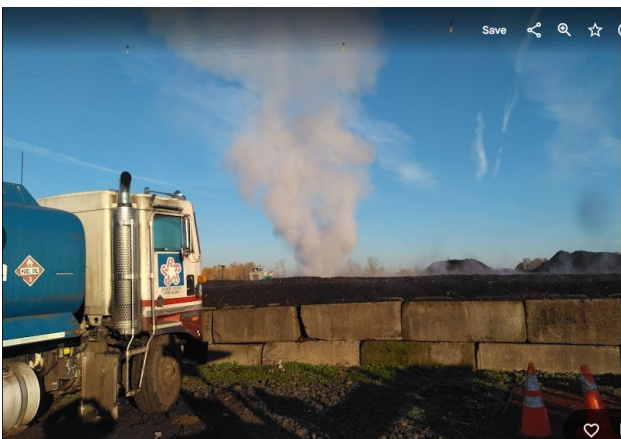
Vegetation Fire October 16,
2024 5:07 PM

Wind coming from
NW towards the
landfill

Coffin Butte
Landfill

Wood Chip Fire at Pacific Region Composting (PRC):

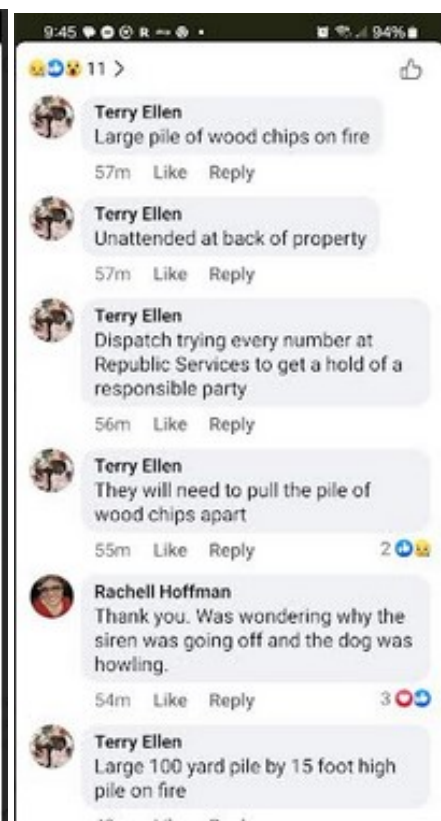
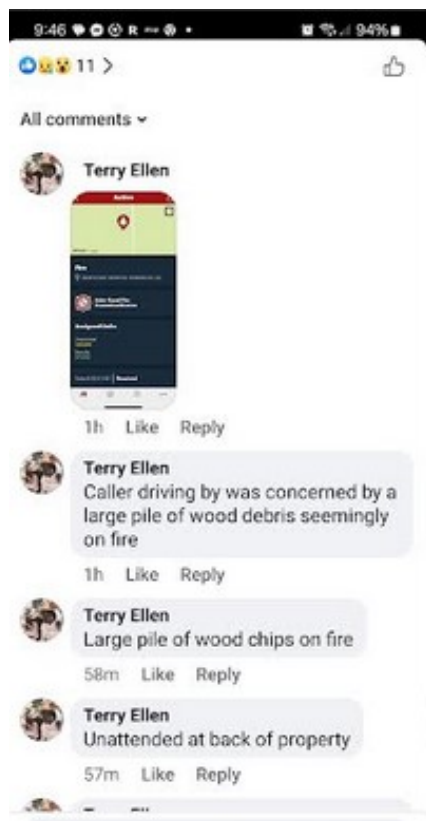
Friday, November 11, 17, 2023 8:35 AM



Question: Was this fire reported to the DEQ?



Smoke investigation 9/24/24 7:44pm
Pacific Region Composting (PRC)





Sunday, January 5, 2025, 9:45 AM

Reported by a citizen passing by the Pacific Region Composting (PRC)

The pile was unattended and the Fire Department was having difficulty reaching anyone from Republic Services.

Economic Impact of Wildfire to Benton County:

A red flag day with low humidity, high temperatures and strong winds coming from the north could take one of the many landfill fires quickly through the Soap Creek Valley, Adair Village, McDonald and Starker forests, Vineyard Mountain, and down into Corvallis and North Albany. This is a significant financial burden on our communities, a significant burden on our services, a significant burden on our citizens, their homes, families, livestock, pets, a significant burden on our industry, including farms and forestry, and business, an overwhelming burden on our firefighters and will absolutely interfere with the uses on adjacent property and with the character of the area.

Question: Does Republic Services and Valley Landfills application include a bond that would cover the catastrophic losses of an event like this now, or after they close shop and leave the landfill to the County and its residents to manage? The \$16 million insurance, certainly will not address this magnitude of event.

Economic Impact



\$7,224

Expected Annual Loss Caused by Wildfire
Benton County, OR

\$107,037,018,461

Total Exposure to Wildfire
Benton County, OR

Sources: FEMA NRI 2023

From the Fire Risk Reduction Profile for Benton County:

<https://reports.mysidewalk.com/b4dd6dbfce>

Overall Potential Impact of Wildfire:

From the Wildfire Risk Explorer Report:



Overall potential impact (if a wildfire were to occur)	
Very High	Overall potential impact is very highly negative (top 5% of values).
High	Overall potential impact is highly negative (80-95th percentile).
Moderate	Overall potential impact is moderately negative (50-80th percentile).
Low	Overall potential impact is slightly negative (30-50th percentile).
Low Benefit	Overall potential impact is slightly beneficial at low flame lengths (15-30th percentile).
Benefit	Overall potential impact is slightly beneficial, with a cumulative positive impact of fire (0-15th percentile).
No Data (blank)	There are no highly valued resources or assets mapped in the area or it is non-burnable (urban, agriculture, barren, etc).

Red circle above is an approximate 5 mile radius of wildfire impact around Coffin Butte Landfill. Note the number of Very High potential risks in this area.

Per the Wildfire Risk Explorer Report: Overall potential impact represents the exposure or consequence of wildfire on all mapped highly valued assets and resources combined, including critical infrastructure, developed recreation, housing density, seed orchards, sawmills, historic structures, timber, municipal watersheds, vegetation condition, and selected terrestrial and aquatic wildlife habitat.

This area includes the Historic Soap Creek Valley Schoolhouse and the Old Growth Forest Trail, Anderson Blues, etc.

Accessed from the Oregon Wildfire Risk Explorer on July 21, 2021

URL: https://tools.oregonexplorer.info/OE_HtmlViewer/index.html?viewer=wildfireplanning

Primary data Source: USDA Forest Service Pacific Northwest Quantitative Wildfire Risk Assessment (2018)

In addition to all of the risks above, is the risk of fire along what should be the safest emergency fire exit route for the nearly 200 households of the Soap Creek Valley. What happens if a Coffin Butte fire ignites the Soap Creek Valley and then, what should be the safest exit route for its residents is blocked by flames and toxic fumes from a landfill fire?

53.215 (1) FIRE SERIOUSLY INTERFERE WITH USES ON ADJACENT PROPERTY There has been testimony (Erin Bradley & Joel Geier) regarding the threat that a fire on the landfill poses to their properties, with the recent fire last summer causing them to evacuate persons and animals from their nearby property when a flare caught the grass on fire

53.215 (1) FIRE SERIOUSLY INTERFERE WITH CHARACTER OF THE AREA A fire that destroyed structures and forests would result in a significant impact in the character of the area, as can be seen from before/after photographs taken in the aftermath of various Oregon fires, including the towns of Phoenix, Talent (structures) in the aftermath of the Almeda fire in 2020

53.215 (2) FIRE UNDUE BURDEN ON PUBLIC IMPROVEMENTS A fire that started at the landfill could damage public improvements, including power and water infrastructure.

53.215 (2) FIRE UNDUE BURDEN ON PUBLIC IMPROVEMENTS If there is an artificial canyon made out of methane-generating garbage on either side of Coffin Butte Road, a fire that started elsewhere and spread to the landfill (via burning embers) could prevent Coffin Butte Road from being a safe egress route for Valley residents and keep EMS personnel from sending firefighting equipment up the valley.

53.215 (2) FIRE UNDUE BURDEN ON PUBLIC FACILITIES A fire that started at the landfill could damage public buildings

like schools and government offices, and areas with cultural significance (for example EE Wilson structures, and the historic Soap Creek Schoolhouse) could be damaged or destroyed.

53.215 (1) FIRE UNDUE BURDEN ADAIR RURAL FIRE AND RESCUE: DANGEROUSLY STEEP SLOPES The Applicant has told the EPA that the surface of the existing landfill is too steep and dangerous for EPA personnel to walk over with hand-held air quality monitoring devices. But to access a fire on the surface of the landfill, fire personnel will have to access these same surfaces (and possibly spray water on slippery tarps to fight a surface fire). This is a threat to the life and safety of firefighting personnel and an undue burden.

53.215 (1) FIRE UNDUE BURDEN ADAIR RURAL FIRE AND RESCUE: ADDITIONAL 59 ACRES OF SURFACE ON WHICH FIRES MIGHT IGNITE The increase in the landfill surface area is 135% of existing flat surface area, without taking slopes into account (like the roof of a building, the surface area of the roof is greater than the two-dimensional building footprint). An increased surface on which fires will have to be fought is a threat to the life and safety of firefighting personnel and an undue burden.

53.215 (1) FIRE UNDUE BURDEN ADAIR RURAL FIRE AND RESCUE: ADDITIONAL 9,000,000 CUYD OF METHANE-GENERATING WASTE IN PLACE The proposal will increase waste in place by 120% over existing waste-in-place. More waste-in-place means more methane. Methane is currently being released as fugitive emissions from the landfill in explosive concentrations. An increased amount of explosive methane is a threat to the life and safety of firefighting personnel and an undue burden

53.215 (1) FIRE UNDUE BURDEN ADAIR RURAL FIRE AND RESCUE: GEOMETRY OF THE PROPOSAL The proposal will create an artificial canyon made of garbage on either side of Coffin Butte Road, each side of which will producing methane at explosive levels. The new topography will intensify fires moving uphill and increase wind speed if a fire ignites on either side of the artificial canyon. Fighting fires in an artificial canyon made of methane-producing garbage is a threat to the life and safety of firefighting personnel and an undue burden.

53.215 (1) FIRE UNDUE BURDEN CORVALLIS FIRE Hot loads could be dumped by the side of any road in Corvallis where there is garbage truck traffic to the landfill. Therefore a fire like the deadly Sandalwood fire could ignite anywhere and if conditions were conducive to fire spread, could pose an undue burden to City of Corvallis firefighting personnel.

53.215 (1) FIRE UNDUE BURDEN OTHER RURAL FIRE DEPARTMENTS Hot loads could be dumped by the side of any road in Benton County where there is garbage truck traffic to the landfill. Therefore a fire like the deadly Sandalwood fire could ignite anywhere and if conditions were conducive to fire spread, could pose an undue burden to City of Corvallis firefighting personnel.

Conditional Use Criteria for the Forest Conservation Zone - Chapter 60

60.220 Conditional Use Criteria. (1) A use allowed under BCC 60.205 or 60.215 may be approved only upon findings that the use: (a) Will not force a significant change in, or significantly increase the cost of, accepted farming or forest practices on agriculture or forest lands; (b) Will not significantly increase fire hazard or significantly increase fire suppression costs or significantly increase risks to fire suppression personnel; and (c) Complies with criteria set forth in BCC 53.215 and 53.220.

Excerpt from the City of Adair Comprehensive Plan:

SECTION 9.612 FIRE PROTECTION & EMERGENCY SERVICES

There are few serious fire hazards within the City or the District. The area has a very light commercial fire hazard with the most significant life hazard being the schools. **The District's greatest hazard is the wild land interface properties and the landfill.** The District has enjoyed Mutual Aid agreements with the neighboring fire departments since the early 1980's and has established a first alarm mutual response policy with the Corvallis Fire Department, Albany Fire Department, and SouthEast Polk Fire District.

Excerpt from newspaper article on the Landfill risks:

So far, fires have remained isolated to the landfill, but residents of Soap Creek Valley fear that the increasing severity of wildfire conditions in Oregon could cause one of these blazes to spread to the surrounding hills. “We’re in a valley with limited ways out,” Eklund said. He worries that if the landfill caught fire, Coffin Butte Road would be impassable due to flames and toxic smoke from burning waste. “It’s a nightmare scenario.”

Question: If there was a fire at Coffin Butte Landfill that completely shut down the ability to dispose of trash, where would Republic Services send all of the incoming trash? Basically, what are the details of Republic Services back up disposal site plan?

I strongly oppose LU-24-027 and urge you to deny its approval. Conditions have never been enforced, so approval with conditions is the same as approval without conditions. Please do not approve this CUP.