

**From:** [Mark Yeager](#)  
**To:** [Benton Public Comment](#)  
**Subject:** Particulate Emissions Coffin Butte Landfill - LU-24-027  
**Date:** Sunday, June 22, 2025 10:46:08 AM  
**Attachments:** [Comments and Photos on Particulate Emissions.pdf](#)

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Please see the attached comments and photographs documenting typical operations of Coffin Butte landfill which will carry forward to the proposed expansion area.

Because the operation of the proposed expansion area will bring the landfill into CLOSER proximity to existing rural residential and small farm operations, it will seriously interfere with the uses on adjacent property and the character of the area.

This application must be denied.

Mark Yeager

Opposition testimony from Mark Yeager, Corvallis, Oregon, June 22, 2025.

LU-24-027 Coffin (Coughin') Butte Landfill Expansion Conditional Use Permit

## **Dust Clouds (Particulate Emissions) from Coffin Butte Landfill**

Coffin Butte is permitted as a municipal solid waste landfill, but the landfill also receives construction and demolition debris and industrial waste. Disposal of these wastes and the associated airborne emissions can pose health and environmental threats to the surrounding community. Situations involving plumes of particulates rising up from the landfill occur frequently and have not been enforced by DEQ in the Title V air quality permit.

The landfill operator (and DEQ) contends that these particulate plumes are contained on site and are not a violation of either their solid waste disposal permit or their Title V air quality permit.

To the contrary, the photographic evidence submitted here demonstrates that these plumes are, in fact, impacting off site property and facilities, including Coffin Butte Road (a public roadway frequented by vehicles and bicyclists) and nearby farm and residential properties. These practices, existing and proposed, violate CH 53.215(1) by seriously interfering with uses on adjacent property and the character of the area. Further, the landfill has a public dumping area on site where residents and other landfill users are exposed to these particulate matter plumes.

During late Summer 2023 a large plume of what looked like smoke was observed rising from the top of the Coffin Butte Landfill. Photographs of air pollution (Exhibit 1) and other photos of Coffin Butte operations (Exhibits 3 & 4) are visual evidence of air pollution coming from the landfill operation as trucks dump wastes at the landfill. The plume from this industrial waste disposal appears to reach 250 to 400 feet high and be 700 to 800 feet wide. These photos provide visual evidence of air emissions rising up from the landfill, likely are leaving the site, and impacting neighbors and the surrounding community.

The plumes come from the portion of the landfill where waste is tipped by the hauler off a prepared rock pad onto the tipping area. The tipped waste is pushed away to the active working face (of the landfill) by a D-9 dozer or a compactor. Two compactors currently work on the landfill to compact the waste. The tipping area location is changed as the landfill is filled up.

Valley Landfills (VLI) compacts the dumped trash to maximize the amount of material the landfill can hold. VLI is required by DEQ to "cover" the dumped and compacted trash daily. Handling the incinerator ash appears to have caused a large dust plume (Exhibit 5). The time between the trash being dumped, compacted, and then covered is a time when particulates can be blown into the air. A DEQ report agreed to the use of ash from the Covanta incinerator in Marion County for daily cover. Although the incinerator may be temporarily

closed, ash from the incinerator monofill along I-5 may be making its way to the dump.

### These plumes matter because:

1. They reflect the lack of care VLI takes with handling wastes that could impact the health of the community.

More information is needed to understand the health effects of the types of plumes observed. In the case of the "white" plume, the material appears to be industrial products and wastes (Exhibit 7, Exhibit 3 page 2,). The OSHA required labeling for the product has the "Hazard Statement: Suspected of causing cancer (by inhalation)". No information on the hazards associated with the incinerator ash used for the "daily cover" is available at this time.

2. They demonstrate an exposure route for chemicals, pathogens, etc. currently being brought to the landfill to spread around the landfill and the surrounding neighborhood. These new threats to human health and the environment would not be identified by the existing landfill groundwater and surface water contamination monitoring systems. This is because the chemicals DEQ requires to be monitored are based on studies from the late 1990's. Chemicals from wastes deposited after these studies were done are simply not tested for. An example is PFAS, or per- and polyfluoroalkyl substances, also known as forever chemicals. These are hazardous compounds that pose a global threat to human health.
3. They highlight Coffin Butte being used for not just trash from our homes but for disposal of industrial wastes. VLI has permission from DEQ to accept wastes from industries dealing with Manufactured Mobile Homes, Hard Board, Papermill, Glass Fiber, Metal Refining, Manufactured Motor Homes and Circuit Boards.

Additional information about the waste streams VLI can accept is contained in Sections 5 and 6 of the Solid Waste Disposal Site Permit. The landfill is prohibited from accepting "listed hazardous" wastes as defined under the Resource Conservation and Recovery Act. There are provisions in the permit for exceptions/special plans that impact what can be disposed of at Coffin Butte. See the actual permit text for these nuanced provisions.

### Takeaways

- *Industrial wastes, some carrying OSHA's "Suspected of Causing Cancer (by inhalation)" warning, are disposed of at Coffin Butte.*
- *Dry industrial wastes received for disposal and incinerator ash used for "daily cover" can cause large air borne plumes of particulate matter.*
- *The DEQ Solid Waste Permit and Title V Air Permit do not appear to address the issue of pollution emanating from the landfill working face a.k.a truck unloading or "tipping" operations or working face area.*
- *Additional work needs to be done to get a better sense of how big a problem this*

*is, should it be allowed to continue, and what can be done to reduce/ eliminate or mitigate the impacts of this emission source.*

### **Community Expectations**

*The community should expect:*

- The landfill operator understands the characteristics of the materials they receive and how to handle the materials safely and in a way that is protective of human and ecological health, and the environment.*
- Oregon regulators apply their rules in an enforceable way that is protective of human and ecological health, and the environment.*
- Benton County to use its authorities to be protective of human and ecological health, and the environment; and to protect its citizens from serious interference with use of land and character of the area.*

The evidence presented here documents the impacts of the existing operation and demonstrates the typical operation of the proposed expansion area – the proposed use will seriously interfere with uses on adjacent property and the character of the area, This application must be denied.

### **Attachments:**

Exhibit 1 White Plume

Exhibit 2 Coffin Butte Landfill Location orientation

Exhibit 3 Bursting Bagged White Wastes

Exhibit 4 Additional Particulate Generation & Dispersal Exhibit 5  
Alternative Daily Cover Plume

Exhibit 6 Location of Working Face

Exhibit 7 Microglass Fiber Packaging & Warning Label

## Exhibit 1 White Plume

The white plume dimensions are difficult to estimate. Assuming the trash truck is 13 feet tall, the plume seems to be on the order of 400 feet to tall and 700 feet wide in the top photo. Shortly thereafter the plume height seems to be on the order of 250 feet to 400 feet tall and more than 800 feet wide. In both photos the plume is moving to the south. For location information, see Exhibit 2.



Source: Benton County Information Request file:  
387477003\_257117073993498\_3158731807361671211\_n.jpg



## An aerial photograph showing a large landslide area. A road intersection is visible in the foreground with a sign for Hwy 99E. The landslide area is labeled with letters A, B, C, D, and E. A is at the road intersection, B is at the top right, C is on the left, D is in the center, and E is at the top left. The landslide material is light-colored and contrasts with the surrounding green forest and brown earth.

- Source: "Neighborhood Posting" around 021624  
File: Landfill Photo Plume Orientation



## Exhibit 3 Bursting Bagged White Wastes

### Exhibit 3 Bursting Bagged White Wastes

#### PAGE 1 OF 3

Source: Benton County Information Request file:  
10000000\_24116829357964857\_5063349022712076000\_n.mp4



Tipping of typical industrial tote bags of wastes from Republic tip trailer. Note "white" layer on compacting dozer (right side of photo).



Some tote bags split open releasing white solids / particulates to atmosphere.

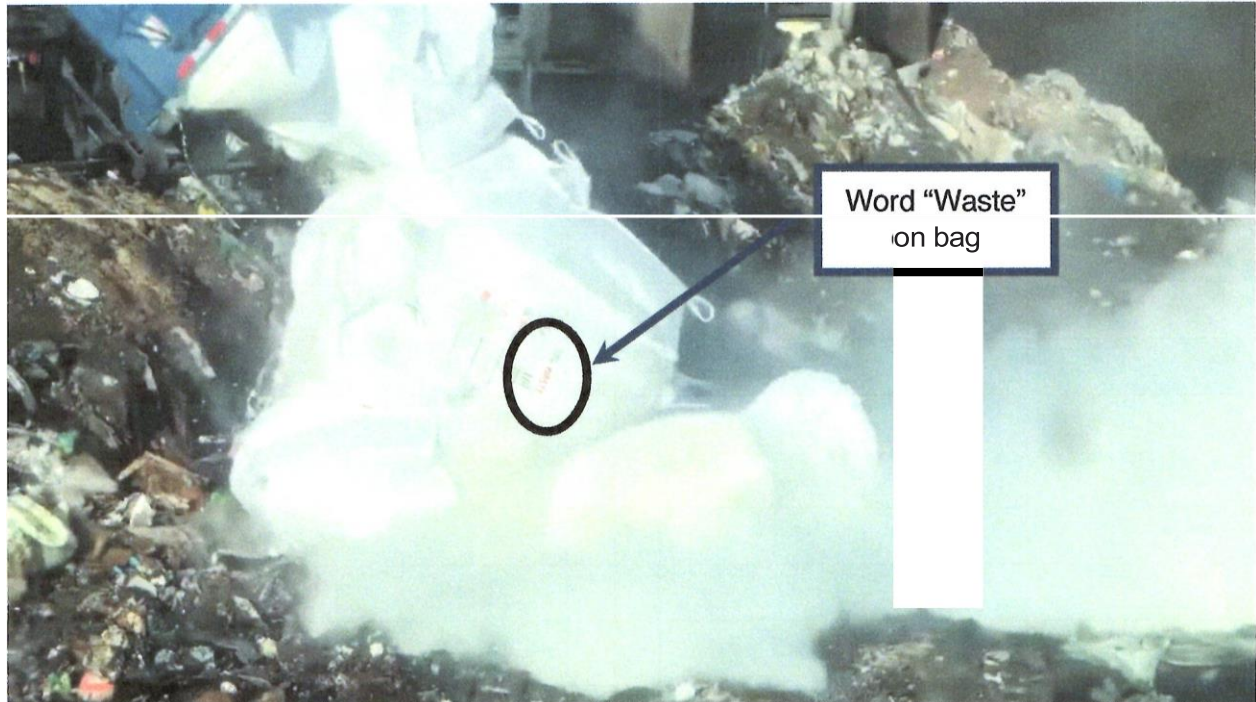


## Exhibit 3 Bursting Bagged White Wastes

### PAGE 2 OF 3

Source: Benton County Information Request file:

10000000\_24116829357964857\_5063349022712076000\_n(1).mp4



Waste designation on tote bag evident as "red" lettering.





## Exhibit 3 Bursting Bagged White Wastes

### PAGE 3 OF 3

Explosive release of solids from tote bags.



Plume of particulates forming near and above compacting dozer.



Deposition of white solids on dozer. Plume moving up and to right. Coffin Butte Ridge evident in top left of photo.



# Dispersal



Source: Benton County Information Request file:  
393490263\_858223245567647\_7833039896963206454\_n.??????

Additional Particulate Generation & Dispersa  
Alternative Daily Cover Plume



## Exhibit 5 Alternative Daily Cover Plume?

Source: Benton County Information Request file:  
387531280\_1051429082850664\_3483495446591138519\_n.jpg



Particulate plume possibly caused by Coventa Incineration Ash handling for Alternative Daily Cover. Scaling dimensions using top of truck trailer as 13 feet, the plume is about 130 feet wide and about 55 feet to 75 feet tall



## Exhibit 6 Location of Working Face

### PAGE 1 OF 2

Source:

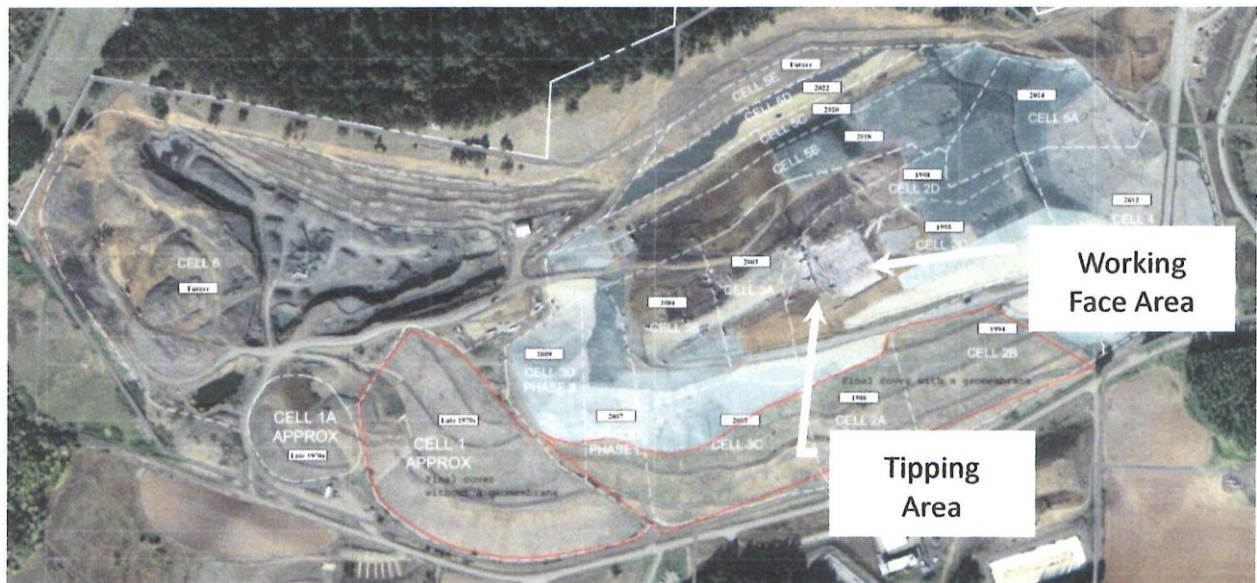
Re: Semi-Annual Report and Annual Report

Coffin Butte Landfill

Operating Permit No. 02-9502-TV-01

Project No. 0120-174-50-40-17

Letter Brett Davis General Manager to Ms. Yuki Puram, Oregon Department of Environmental Quality, Air Quality Division, February 7, 2023



See next page for enlargement.

## Exhibit 6 Location of Working Face

PAGE 2 OF 2





## Exhibit 7 Microglass Fiber Packaging & Warning Label

PAGE 1 OF 2



Microfiber waste in tipping area.

The next photo is a larger version of symbol area at lower left of white bag.

Source: Source: Benton County Information Request file:  
393244136\_696593272066824\_8965835027900706129\_n.jpg



Microglass Fiber



Warning

Contains: Man-made vitreous (silicate) fibres with random orientation with alkaline oxide and alkali earth oxide content greater than 18% by wt.

Hazard Statement: Suspected of causing cancer (by inhalation).

Precautionary Statement: Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Use personal protective equipment as required.

Response: IF exposed or concerned: Get medical advice/attention.

Disposal: Dispose of contents/container in accordance with

local/regional/national/international regulations.

Supplemental information: Not Applicable.

Enthält:  
statistis  
Alkalio  
als 18  
Gefahr  
erzeug  
Sicher  
Anwei  
Sicher  
Persön  
Reakt  
Ärztlic  
Entso  
lokale  
Vorsc  
Angab  
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