

From: [Debbie P](#)
To: [Benton Public Comment](#)
Subject: LU-24-027
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Attachments: [RS-flare-2-12-25.png](#)

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Dear Chair Fowler and members of the Planning Commission,

My name is Debbie Palmer, and I live at 37340 Moss Rock Drive, in Corvallis.

I would like to submit for the record this photo I took of Republic Services' brand new "enclosed flare" on February 12, 2025... less than six months after this 'state of the art' flare was installed in response to a DEQ Class 1 violation regarding their prior flare (and which only finally became operational after much foot-dragging and many extensions of deadline to put off installing). The smoke/flames event was not brief; we estimate it had to have burned like this for at least an hour. (A neighbor and I witnessed it together; it burned for at least a half-hour while we were present in the area, and we don't know how long it had been burning before we got there.)

What's important to note here: these flares are supposed to be a) clean burning and b) the flames are intended to burn *inside, down at the very bottom of the stack (i.e. "enclosed")*. As you can see here, not only is there a bunch of smoke, but *the flames are actually shooting out the top of the stack*.

This is a perfect example of either the applicant's poor operations management, or of just how difficult it is to operate a landfill in this wet climate. Leachate getting into the gas lines?

This is just one example of how out of control things are at the existing facility. I'm showing you this to emphasize the idea that - if they can't make things work correctly at their existing facility, how can you credibly believe that they will be able to do so in the new landfill they want to build on the south side of Coffin Butte Road?

Jeff Condit, in his closing remarks at the hearing Day 2 (May 1st) actually had the temerity to say, "This is a well run site. It's been well run for its entire history..." I find that to be an extreme stretch of the truth.

Oh, and another thing: remember how I said in my oral testimony on May 8th that we all know that "self-monitoring = no monitoring"? Well, Republic's "self-reporting" is handled similarly — at least when it comes to fires. In a Public Records Request for all fires reported to DEQ by Republic that included the time period in which this flare fire occurred, there was no mention of it. (There were other un-reported fires, but I believe these are mentioned in others' testimonies.) In other words, if they think they can get away with not reporting events that occurred, that's what they'll do: not report them. They will only report fires that were public enough to make the news (the working face fire, the grass fire beside the old flare, e.g.).

Please do not approve this application "with conditions." Republic will find ways to evade/postpone/delay and avoid meeting them as much as they possibly can. And we already know Benton County will not enforce them. They can't, really; they don't have the capability.

Conditions are as good as useless; they are just a way for Benton County to make it *look* like they are doing something about the landfill's adverse impacts when in fact all they're doing nothing at all. Meanwhile the only one that benefits is Republic Services - *because they'll get their CUP*. Please: use the power of discretion granted to you by Benton County CUP criteria and deny this application. There are alternatives to having a perpetual landfill in Benton County (which is what this will become if this expansion is granted). Deny this application and force the County to consider them.

I thank you sincerely for all the work you are putting in on this.

Debbie Palmer



