DATE RECEIVED: 7/9/25
FROM: Kate Harris
PHONE OR EMAIL:

Benton County Planning Commissioners c/o Planning Division
4500 SW Research Way, Corvallis, OR 97333
July 9, 2025
RE: LU-24-027 Conditional Use Permit Application Regarding Landfill Expansion: Adair Village Drinking Water

Good Evening Chair Fowler & Commissioners,

My name is Kate Harris, I reside at 37268 Moss Rock Dr, 4 miles due south of Coffin Butte Landfill. I have a degree in Civil Engineering from the University of Portland, in which I studied water treatment plants, wastewater treatment plants, and solid waste management, including Coffin Butte Landfill specifically. Thank you for the long hours you've put into this process & for your thoughtful consideration of this matter, the future of our county & our neighbors rests upon your shoulders. I do not envy your current task.

Thank you to Virginia Scott for her time, please refer to her written testimony submitted today regarding a rebuttal about fire considerations, including this quote: "Self-monitoring by Republic Services is like the fox guarding the hen house. Thus approval with conditions is exactly the same as approval without conditions. These conditions will never be met, no monitoring will be done, no repercussions to Republic Services will occur, all bad current behavior will continue unabated on a larger scale, and the community, environment, businesses, forest, land, people, health, air, water, wildlife, etc., will suffer (dead hens in the hen house). This is the very the definition of undue burden."

I'm here this evening to discuss the impact of Coffin Butte's current and future operations on waterways, the environment & drinking water. My points are relevant to this expansion discussion, because any expansion will only exacerbate the issues I will raise.

To quote *The Brocovich Report* publication's article, "No Surprise: PFAS Found Near Wastewater Treatment Plants & Biosolid-Applied Lands":

"A new analysis from Waterkeeper Alliance warns that 98 percent of tested waterways across 19 states contain toxic per- and polyfluoroalkyl substances (PFAS), and in particular downstream from wastewater treatment plants (WWTPs) and sites where biosolids have been applied. The researchers connected this finding to the disproportionate siting of sources of environmental pollution including PFAS contamination such as major manufacturers, airports, military bases, wastewater treatment plants, and landfills that are typically located near watersheds serving these communities. Listen, we've known we have a huge PFAS problem, and now we have more data to prove it. That's a good thing. American communities are exposed daily, often unknowingly, and many face serious, disproportionate health risks. The tools to address this crisis exist, but the political will is lacking. We cannot afford more watered-down regulations and loopholes for industrial source

polluters. The science is clear: EPA and lawmakers must act decisively, and with urgency, in the public's interest. If you get your drinking water from a private well, you may want to test your water to find out exactly what's in it. You can contact a state-certified lab for professional analysis. Some counties may offer free or discounted tests, so check with local authorities first."

Does Republic or the County offer these free tests to residents?

Republic testimony yesterday stated that an official from Adair Village said there was not a problem with PFAS contamination.

That is most likely "true" as it has apparently never been tested, or the very least, **never been reported to the public.** The 2024 water test report is available https://adairvillage.org/wp-content/uploads/2025/06/Adair-Village-CCR-2024.pdf

To clarify discussion yesterday about Adair Village. Pat Hare is the City Administrator for the City of Adair Village, and I believe he may be the entity referenced by Petra yesterday, as the one who was contacted twice, but chose to give no input. I do not know if his City Council or Mayor was privy to that discussion or their ability to provide input. Adair Rural Fire Protection District is a separate and unrelated organization, which was never contacted by the county regarding this expansion application, although did voluntarily submit testimony in May. The county did not seek interested-party information from the fire district.

Back to the discussion of Adair Village's drinking water. Pat Hare and his family live in Scio and therefore he doesn't have any specific family safety concerns with the quality of water in Adair Village. He has done a lot of amazing work for the water system in recent years, and should be very proud of the work he's done, but that work does not guarantee safety. I personally sent an email to him, Adair's mayor, the head of their planning commission, and the superintendent for the school in Adair Village, in 2021, regarding concerns for drinking water safety and air quality. I received no replies. I was told third hand that Pat's method of dealing with concerns like that is to simply ignore the emails. Perhaps that is also what he did with any requests sent from the County.

When I lived on the Adair Village water system from 2014 to 2017, many of us had concerns of extremely high chlorine. Those concerns were dealt with inappropriately, by the same staff that is currently working the water system.

I would not rely on Republic's statement last night that Pat said "his water is fine". Where are the tests? If they wanted to prove it was fine, why did Republic not fund PFAS testing for Adair Village drinking water? Isn't that what a good neighborhood would do? What about all of the neighboring private wells? Where are those test results?

Adair water quality won't be a player in this discussion if Corvallis really stops taking leachate at the end of the year. But as we heard yesterday, Republic doesn't have a plan, so it's still worth discussing.

Pat Hare just received confirmation of $4 million from the state for his new wastewater treatment plant. Past discussions have included Republic adding funding for that new plant so they could treat leachate there. That discharge is reported to be upstream of the Adair water intake in the Willamette, so Adair water quality really should be part of this discussion moving forward, until we have binding contracts in place stating leachate will not end up in local drinking water sources.

But where will it end up?

Perhaps the discussion should be redirected to what constitutes an undue burden. Any landfill in the Willamette Valley creates an undue burden on the population and waterways in the Valley, and thereby on the character of the area. Republic's own corporate website, discusses that landfills in arid locations produce very little leachate, often so little that it can be used for dust control, on top of the landfill, thereby containing the toxins to the lined cells themselves. Not impacting any population, nearby waterway, or character of the area.

So perhaps this discussion should be less about what drinking water or well tests have or have not been funded by Republic as a good neighbor, and whether or not this landfill should be here at all. Expanding the amount of leachate produced by Coffin Butte is in and of itself and UNDUE BURDEN to the character of the area, namely the environment and entire population of Western Oregon. While we're on that topic, why don't we ask the county to produce the documentation that shows that the expansion into Cell 6, the quarry, is actually approved by permit. Operations in the quarry may also be an unapproved undue burden to the local population and the population of Western Oregon. Republic has the ability to transport and dispose of this waste in arid locations east of the Cascades, via rail, ultimately reducing their truck trips and carbon footprint, counter to the testimony by Linda Brewer earlier this evening. We have seen examples in other counties of waste disposal costs going down with a loss of monopoly and introduction of alternative disposal options, also counter to Ms. Brewer's testimony.

This discussion of expansion here in the Willamette Valley needs to stop, and we need to start discussing how to move waste disposal out of the Willamette Valley.

Thank you for your time over these many months. We all appreciate your efforts.

No Surprise: PFAS Found Near Wastewater Treatment Plants & Biosolid-Applied Lands

ERIN BROCKOVICH AND SUZANNE BOOTHBY

A new analysis from Waterkeeper Alliance warns that 98 percent of tested waterways across 19 states contain toxic per- and polyfluoroalkyl substances (PFAS), and in particular downstream from wastewater treatment plants (WWTPs) and sites where biosolids have been applied.

Listen, we've known we have a huge PFAS problem, and now we have more data to prove it. That's a good thing.

In fact, elevated levels of PFAS were detected at 95 percent of sites located downstream from WWTPs, while 80 percent of sampled sites downstream from biosolids application fields were also contaminated.

Land application of biosolids refers to the spraying, spreading, incorporation, or injection of sewage sludge (the EPA typically uses the term biosolids) into or onto the land to either condition the soil or fertilize crops or vegetation grown in the soil.

The new report, which was created in partnership with local Waterkeeper groups and the Hispanic Access Foundation, builds on the 2022 Phase I report, which found PFAS contamination in 83 percent of tested U.S. rivers, lakes, and streams.

The more we test, the more we find....

The Phase II report looked specifically at sites downstream from permitted biosolids application fields and WWTPs in disproportionately impacted communities in 19

states.

"There is no denying that PFAS contamination is a national crisis," Marc Yaggi, CEO of Waterkeeper Alliance said in a statement. "Our latest sampling confirms that it's widespread and persistent, threatening waterways and public health across the country."

Vanessa Muñoz, waterways program manager at Hispanic Access Foundation added in the statement that "what is often overlooked is who is being exposed to it and why, and unfortunately Latino and other communities of color are disproportionately faced to bear the burden."

These findings build upon a 2023 study led by researchers from Harvard T.H. Chan School of Public Health, which found that people who live in communities with highe proportions of Black and Hispanic/Latino residents are more likely to be exposed to harmful levels of PFAS in their water supplies than people living in other communities. The researchers connected this finding to the disproportionate siting of sources of environmental pollution including PFAS contamination such as major manufacturers, airports, military bases, wastewater treatment plants, and landfills tha are typically located near watersheds serving these communities.

The most detected PFAS found:

- **WWTPs**: PFOA, PFHxA, PFBS, PFPeA, PFHpA, PFHxS, PFOS.
- **Biosolids**: PFBA, PFBS, PFPeA, PFHxA, PFHpA.

While we do have national drinking water standards for the two main types of PFAS (PFOA and PFOS), we have a gap in federal limits for PFAS in biosolids despite the EPA knowing of its presence since at least 2003. In 2023, EPA estimated that 60 percent of biosolids were land-applied for agriculture, reclamation, or other uses with 31 percent applied to U.S. agricultural land.

Some states like Maine, Connecticut, and Michigan have placed bans or limits on the use of land application of biosolids, but it's a motley mix of regulations.

In 2024, the EPA said it has no obligation to regulate PFAS in biosolids in a federal lawsuit brought by farmers in Texas, alleging they have been harmed by PFAS contamination from the spreading of biosolids on agricultural land.

"Currently, there is little accountability for PFAS entering our environment and water through poorly regulated pathways," Yaggi said. "American communities are exposed daily, often unknowingly, and many face serious, disproportionate health risks. The tools to address this crisis exist, but the political will is lacking. We cannot afford mor watered-down regulations and loopholes for industrial source polluters. The science is clear: EPA and lawmakers must act decisively, and with urgency, in the public's interest."

This new data is on top of recent research that found PFAS in private wells throughou Pennsylvania.

Waterkeeper Alliance urges EPA and lawmakers at all levels to:

- Establish and enforce federal standards for PFAS in drinking water and surface water discharges under the Safe Drinking Water Act and the Clean Water Act
- Prohibit the land application of PFAS-contaminated biosolids
- Implement class-based regulation of PFAS instead of individual compounds to help address the health risks posed by exposure to multiple PFAS chemicals, prevent harmful substitutions, and streamline monitoring, treatment, and enforcement efforts
- Prioritize funding for PFAS monitoring and the deployment of treatment technologies to protect all communities, especially those disproportionately

impacted by forever chemicals and other forms of pollution.

The latest Environmental Protection Agency data show that more than 158 million Americans in all 50 states and the District of Columbia have PFAS in their drinking water.

You can use EWG's Tap Water Database and search by ZIP code to see reports from your water utility about contaminants they've detected or use this interactive PFAS map as another tool to see where these chemicals contaminate drinking water. Many locations exceed the EPA's 2024 standards of 4 parts per trillion for PFOA and PFOS, two of the most well-studied types of PFAS.

If you get your drinking water from a private well, you may want to test your water to find out exactly what's in it. You can contact a state-certified lab for professional analysis. Some counties may offer free or discounted tests, so check with local authorities first. We also like the test kits from Tap Score, if you have the means to work with them.

Both carbon-based and RO water filters can help reduce PFAS in your drinking water.

To read the full report from Waterkeeper Alliance, go here.

Gut Instincts

Scientists have discovered that certain species of microbe found in the human gut can absorb PFAS, and that boosting these species in our gut microbiome could help protect us from the harmful effects of PFAS.

The new study, conducted by scientists at the University of Cambridge, identified a family of bacterial species, found naturally in the human gut, that absorb various PFAS molecules from their surroundings.

This research shows the first evidence that our gut microbiome could play a helpful role in removing toxic PFAS chemicals from our body, but it hasn't been tested in humans.

That's the next step. Researchers want to use their discovery to create probiotic supplements that can boost the levels of these helpful microbes in the gut, to protect against the toxic effects of PFAS.

"Given the scale of the problem of PFAS 'forever chemicals,' particularly their effects on human health, it's concerning that so little is being done about removing these from our bodies," Dr Kiran Patil in the University of Cambridge's MRC Toxicology Unit and senior author of the report said in a statement.

"We found that certain species of human gut bacteria have a remarkably high capacity to soak up PFAS from their environment at a range of concentrations, and store these in clumps inside their cells. Due to aggregation of PFAS in these clumps, the bacteria themselves seem protected from the toxic effects."

This research offers new hope because as readers of this newsletter know: PFAS is in everything and already in us. From waterproof clothing and non-stick pans to lipsticks and food packaging, PFAS is hard to avoid and takes thousands of years to break down

"The reality is that PFAS are already in the environment and in our bodies, and we need to try and mitigate their impact on our health now," said Dr Indra Roux, a researcher at the University of Cambridge's MRC Toxicology Unit and a co-author of the study. "We haven't found a way to destroy PFAS, but our findings open the possibility of developing ways to get them out of our bodies where they do the most harm."

It's good to know that researchers are approaching the PFAS problem from a new

angle. As we wait for regulations and enforcement to catch up, we may have more ways to protect ourselves.

Data Centers Continue To Strain Power & Water Resources

This massive industry is growing extremely fast, requiring huge amounts of energy, land, and water to operate. In Virginia, it's big business.

For local governments, attracting data centers to their municipalities means a financial boon. Virginia Gov. Glenn Youngkin said in 2024 that Virginia's existing data centers brought in $1 billion in tax revenue.

When data centers are proposed in Virginia, their applications are approved by the county, city, or town they plan to build them.

But recently a rural community in Southern Virginia fought one of the country's biggest gas-powered data centers—and won.

"Northern Virginia has been dubbed the "Data Center Capital of the World," with 507 data centers located north of Richmond, Virginia, a higher concentration than in any other state or country," writes Julia Tilton for *The Daily Yonder*. "Artificial intelligence (AI) is driving a sharp increase in power demand from data centers, which are critical for powering the large language models on which the technology is built. These giant buildings house the computers and servers necessary to store and send information, and they can consume millions of gallons of water each day."

She writes about the trend to develop data centers in rural areas across the country, particularly in the Southeast. Proposed data center campuses in Bessemer, Alabama, Davis, West Virginia, and Oldham County, Kentucky have all drawn local opposition; a common thread is developers limiting public access to information about the projects.

In Pittsylvania County, Virginia, residents said persistent engagement with local government was the key to pushing back on building a huge new data center in their area.

Read the full story here.

Hidden Costs of the Cloud: Data Centers in Virginia

What do you think about this new PFAS research and a potential probiotic that could help your body shed some of these toxic compounds? Do you want us to keep covering data centers? Tell us what you think in the comments below.

The Brockovich Report is a reader-supported publication. To receive new posts and support my work, consider becoming a free or paid

City of Adair Village
Grounded in history, growing for the future.

City of Adair Village, OR

2024 Water Quality Report

We are committed to ensuring the quality of your water. This report is designed to inform you about the quality of water and the services we deliver to you each day. Our constant goal is to provide you with a safe and dependable supply of drinking water resources.

Your water meets all state and federal regulations for safety.

This brochure is a snapshot of the quality of the water we provided last year. Included are details about where your water comes from, what it contains, and how it compares to Environmental Protection Agency (EPA) standards. We are committed to providing you with the information because we want you to be informed. For more information about your water call 541-745-5507 during business hours.

Drinking water sources

Your water comes from the Willamette River at Hyak Park. Source water assessment information may be obtained from your Public Works Department at 541-230-0039 during business hours.

Public participation opportunities

Adair Village city council meetings are held on the first Tuesday of the month at 6:00 pm at the Adair Community Building at 6030 William R. Carr Ave. Adair Village, OR. Please feel free to participate in these meetings.

Contaminants in water

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally occurring minerals, and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in source water before we treat it include:

- *Microbial contaminants*, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.
- *Inorganic contaminants*, such as salts and metals, which can be naturally occurring or result from urban storm water runoff, industrial or domestic wastewater discharges, oil and gas production, mining or farming.
- *Pesticides & herbicides*, which may come from a variety of sources such as agriculture and residential use.
- *Radioactive contaminants*, which are naturally occurring.
- *Organic chemical contaminants*, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and also can come from gas stations, urban storm water runoff, and septic systems.
- *Lead*, if present, elevated levels of lead can souse serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. The City of Adair Village is responsible for providing high quality drinking water but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at www.epa.gov/safewater/lead

Water quality monitoring

To ensure that tap water is safe to drink, EPA prescribes regulations that limit the amount of certain contaminants in water provided by public water systems. We treat our water according to EPA's regulations. Food and Drug Administration regulations establish limits for contaminants in bottled water, which must provide the same protection for public health.

Water quality data

The table in this report lists all the drinking water contaminants we detected during the 2024 calendar year. The presence of these contaminants in the water does not necessarily indicate that the water poses a health risk. Unless otherwise noted, the data presented in this table are from testing done January 1 through December 31, 2024. The state requires us to monitor for certain contaminants less than once per year because the concentrations of these contaminants are not expected to vary significantly from year to year. Some of the data, though representative of the water quality, is more than one year old.

Notes for Immuno-compromised Individuals

The Environmental Protection Agency (EPA) has determined that your water is SAFE at these levels. Some people may be more vulnerable to contaminants in drinking water than the general population. Immune compromised persons such as people with cancer undergoing chemotherapy, people who have undergone organ transplants, and people with HIV/AIDS or other immune system disorders are at risk. Some elderly people and infants can also be particularly at risk from infections. These people should seek advice about their drinking water from the health care providers. EPA/CDC guidelines on appropriate means to lessen the risk of infection by cryptosporidium and other microbiological contaminants are available from the Safe Drinking Water Hotline at 1-800-426-4791.

Terms and Abbreviations

Action Levels

The concentration of a contaminant which, if exceeded, triggers a treatment technique or other requirement which a water system must follow.

MCL

Maximum Contaminant Level: The highest level of contaminant in drinking water that is allowed in drinking water. MCL's are set as close to the MCLG's as feasible using the best available treatment technology.

MCLG

Maximum Contaminant Level Goal: The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLG's allow for a margin of safety.

ppm

Parts per million: One ppm is roughly equivalent to 1 milligram per liter. A one part per million salt solution would be about one teaspoon of salt divided equally among two dozen 55-gallon drums of water. One part per million is equivalent to one penny in a thousand dollars.

ppb

Parts per billion: One ppb is roughly equivalent to 1 milligram per 1000 liters.

Primary Standard

Legally enforceable standards issued by the US EPA. Primary standards limit the level of specific contaminants that are allowed to be present in public drinking water supplies.

ND

No contaminant was detected in the test.

Sampling and Reporting of Compliance Violations

The state and EPA require us to test our water on a regular basis to ensure its safety.

If you have any questions regarding this report or concerning your water utility, please contact the City of Adair Village at (541)-745-5507. We want our valued customers to be informed about their water utility. If you would like to learn more, please attend our regular City Council Meetings.

Water Quality Monitoring Reports

The information below summarizes the most recent test results (2024) of detected levels of primary standards found in your drinking water. If you have any questions, please feel free to contact the City of Adair Village during business hours (541-745-5507).

Parameters	MCL	MCLG	Our Water	Sample Date [1]	Violation (Y or N)	Typical Source of Contamination
VOC	NA	NA	ND	2024	N	Volatile organic compounds- paints, paint strippers and other solvents such as aerosol sprays, cleansers, stored fuels and automotive products to name a few.
Nitrate as Nitrogen (ppm)	10	10	.47	2024	N	A metal found in natural deposits as ores containing other elements.
Total Organic Carbon	2.0	NA	1.02	2024	N	Naturally present in the environment
Turbidity (ntu)	1.0 95%<0.30	NA	0.123 max	2024	N	Soil runoff
TTHM (Total Trihalomethanes) (ppb)	.080	NA	0.0125	2024	N	Bi-product of disinfection
Haa5 (Halo acetic Acids) (ppb)	.060	NA	0.0119	2024	N	Bi-products of disinfection
SOC	Due 2026			2026	N	Synthetic organic compounds- herbicides, insecticides, pesticides, and or fungicides.
Lead (ppb)	Action Level 90% of homes tested must have tested < .015	.015		Due in 2025	N	Corrosion of household piping.
[1] Some testing is not required annually. This date is the year of the most recent test.						
Unregulated Contaminants						
Asbestos MFL	7.0 MFL	NA	ND	2019	N	Corrosion from piping

The EPA requires the following statements by all water providers regardless of whether there are contaminants in the water supply. Adair Village's water is safe and fulfills all EPA requirements.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the EPA's Safe Drinking Water Hotline (1-800-426-4791)

What areas are included in Adair Village water system's Drinking Water Protection Area?

The drinking water for Adair Village Water System is supplied by an intake on the Willamette River. This public water system serves approximately 650 residences. The intake is located in the Marys River/Muddy Creek Watershed in the Upper Willamette Sub basin of the Willamette Basin. The drinking water intakes for the City of Philomath, City of Corvallis, and Pope & Talbot, Inc. public water systems are also located on the Willamette River or its tributaries upstream of the Adair Village intake. This assessment addressed the geographic area providing water to Adair Village's intake (Adair Village's portion of the drinking water protection area) between Adair Village's intake and the next upstream intakes for Philomath (on the Marys River) and Corvallis (on the Willamette River). The geographic area providing water to Adair Village's intake (Adair Village's portion of the drinking water protection area) extends upstream approximately 424 miles in a southerly direction and encompasses a total area of 366 square miles. Included in this area are a number of tributaries to the main stem, including Marys River and its tributaries, Muddy Creek and Little Muddy Creek. The protection area within an 8-hour travel time from the intake extends approximately 14 miles upstream of the Adair Village intake.

What are the potential sources of contamination to Adair Village Water System's public drinking water supply?

Potential contaminant sources identified include clear cuts, non-irrigated crops, non-irrigated crops, nurseries grazing animals, two unknown commercial operations, gas stations, a communication company, junk yard, fabrication/manufacturer companies, lumber companies, hospitals, electronic manufacturer, DEQ cleanup sites, public works shops, gravel companies, high density housing, rural homesteads, two wastewater treatment plants, two water treatment plants, parks, schools, storm water outfalls, sewer lines, fire stations, a golf course, several research facilities, Oregon State University and five transportation corridors.

WHAT ARE THE RISKS FOR OUR SYSTEM?

A total of 47 potential contaminant sources were identified in Adair Village Water System's drinking water protection area. Of these, 40 are located in the sensitive areas and 37 are high- to moderate-risk sources within "sensitive areas". The sensitive areas within the Adair Village Water System drinking water protection area include areas with high soil permeability, high soil erosion potential, high runoff potential and areas within 1000' from the river/streams. The sensitive areas are those where the potential contamination sources, if present, have a greater potential to impact the water supply.

More information about contaminants and potential health effects can be obtained by calling the EPNs Safe Drinking Water Hotline (1-800·426- 4791).

This water quality report was prepared by the City of Adair Village, OR.