From:	Pamela Castle
To:	Benton Public Comment
Subject:	LU-24-027 comment
Date:	Tuesday, July 15, 2025 6:13:10 PM
Attachments:	Response to new evidence RE LU-24-027 - Pam Castle.pdf

RE: LU-24-027, the application to expand Coffin Butte Landfill

Dear Planning Commission Members,

I urge you to deny the application for expansion of Coffin Butte Landfill and this letter is a response to the Pawlowski letter in Section 9 "New Evidence from the July 8-9 Hearings" section in Munidocs. https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8287987d132c0. In particular, I will address the comments about PFAS and those that recommend the county rely upon agencies to hold VLI accountable for landfill issues. I also make reference to Applicant's July 8 slide presentation also in that Munidocs section and my own written testimony regarding PFAS in leachate submitted on 6/11/2025. (https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8135d7834e2c8).

Below I provide Mr. Pawlowski's comments in italics followed by my response to each comment.

Pawlowski comment 6, bullet point 2 – "*…Let Benton County rationally follow our nation's regulatory agency rules for guidance."*

- We know from Slide 16 of the applicant's July 8 slide show that not all the issues associated with landfills that are of environmental and human health concern are regulated by federal agencies. In the case of landfill leachate PFAS, for example, relying on agency rules and enforcement would mean there would be no oversight because, as the applicant says, "Currently there is no formal requirement to monitor PFAS in leachate or groundwater".

- Landfill leachate is known for its heavy PFAS load and large volumes of it are sent to the WWTPs of Corvallis and Salem. Somewhere around 30+ million gallons of CBL leachate is processed with municipal wastewater at municipal wastewater treatment plants (WWTPs) each year.

    - As described in my written testimony submitted into the written record on 6/11/2025, **municipal wastewater treatment plants (WWTPs) do not**

treat PFAS. PFAS mitigation requires specific processes that are not included in the WWTP process. Because of this the PFAS entering the municipal wastewater plant with leachate are not removed. They are:

- Released into the Willamette River with WWTP effluent.
- Distributed into the air as aerosolized droplets generated during aeration steps of wastewater treatment resulting in elevated PFAS levels around WWTPs.
- Spread with WWTP biosolids onto soils around the region.

- As very recently reported by The Guardian newspaper, the U.S. government has pulled $15 million in funding earmarked to study the effects of PFAS contamination of agricultural land, contamination primarily due to spreading of biosolids from WWTPs. These studies were designed to determine how PFAS move into and accumulate in crops and livestock and enter our food supply so that policy around biosolids use could be developed.
  - This is an example of why we cannot wait on agencies to police this issue. They aren't going to be able to do that for a long time because of cuts like this. Meanwhile, PFAS-laden WWTP biosolids continue to be spread onto our fields where they will persist in the environment, and emerge from the landfill in fugitive emissions and from generating plant and from flare exhaust.
  - Agencies lack the staff and funding to act fast enough to prevent lasting environmental damage, two problems which will almost undoubtedly worsen going forward. These two problems are worsening.

Pawlowski comment 6 bullet point 3 – *There has been recent concern of PFAs or other "forever" chemicals that spawn from breakdown of synthetics and plastics. Although it is argued that these chemicals are 'concentrated' at the landfill operation, these compounds are in everything we touch.*

- First, I'll touch on the idea that these are of recent concern. PFAS have been the subject of scrutiny for decades with the first EPA action on the group of chemicals coming in 2006.

- According to SL Environmental Law Group, in 1999 a lawsuit was filed against DuPont over their contamination of water with PFOS - one of the thousands of PFAS chemicals out there. DuPont settled because the facts showed they had not disclosed the known dangers of this compound.

- As early as the 1960s, scientists were documenting the dangers of PFAS exposure and the diseases they cause in lab animals.

- This is not a recent concern. It is true that it has become an increasingly alarming concern, but one that has been documented for many decades. This also points to why agencies cannot be relied upon to police landfills; they are too slow in developing regulations.

- Second, Mr. Pawlowski seems to be of the belief that our exposures to PFAS in everyday life are equivalent to chronic exposure to higher levels of PFAS via multiple routes This is, of course, not true. Dose is important here and one of the reasons we need to prevent more PFAS from concentrating in and contaminating our environment.

- Third, PFAS <u>are</u> concentrated at Coffin Butte Landfill, we have a much greater quantity of PFAS in our county than we would have if the landfill wasn't here.

    - This would not be as serious a problem if the PFAS remained in the landfill like they do in a dry environment where there is little landfill gas and leachate production. The main routes for PFAS escape from landfills are via landfill gas (even captured, flared landfill gas) and via leachate whether it leaks or is processed at WWTPs where PFAS are not treated.

Pawlowski comment 6 bullet point 4 - *PFAS are currently under research. Information on health affects are going through the scientific learning process.*

- While it is true that we are still, and will be for a long while, figuring out all of the ways that PFAS affect the health of humans and other living organisms, there are well-documented health consequences of PFAS exposure. Some of these effects are shown in a Slide 2 of my 6/11/2025 testimony.

    - That PFAS are harmful is not in question, the questions surround the types of harms and how PFAS cause these harms.

Pawlowski comment 6 bullet point 6 – *Why be in fear of what we do not know when the average human lifespans are longer than they ever have. Perhaps the invention of synthetics and plastics have benefited life more than we realize.*

- When I first read this comment, I wasn't even sure where to begin because of the unbelievable leap that was made and I still don't know what to say. It is sort of like saying that the number of Starbucks coffee shops have increased drastically during the time that human lifespans have increased, so perhaps the increase in number of locations of this franchise is responsible for that increase in human lifespan. Suffice it to say that PFAS are not lengthening lifespans.

Thank you for your time and commitment to this process. I know that it has been arduous and taxing and I do not envy you the task. Rest assured that your efforts are truly appreciated.

Thank you,

Pam Castle, M.S. Pharmacology/Toxicology

993 NW Cypress Avenue, Corvallis, OR 97330

The attachment is a PDF of this comment in the event that is preferrable.

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    - As described in my written testimony submitted into the written record on 6/11/2025, **municipal wastewater treatment plants (WWTPs) do not treat PFAS**. PFAS mitigation requires specific processes that are not included in the WWTP process. Because of this the PFAS entering the municipal wastewater plant with leachate are not removed. They are:

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