



## MEMORANDUM

**TO:** Benton County Board of Commissioners  
**FR:** Bailey Payne, Solid Waste Program Coordinator  
Bob Richardson, Community Development Director  
**DT:** May 13, 2026  
**RE:** 2024 Coffin Butte Landfill and Pacific Region Compost Annual Report

### Background

Under the 2020 Landfill Franchise Agreement, Valley Landfills, Inc. is required to submit annual data, allowing Benton County to monitor compliance with environmental regulations and assess landfill capacity. Sections 7(b) and 7(c) of this agreement mandate that the franchisee report necessary operational metrics and provide copies of documentation submitted to state or federal agencies to the County. This historical, data-driven oversight ensures continuous environmental compliance, accurate capacity monitoring, and local safety alignment. These reports have been provided by the franchisee each year, dating back to 1993.

### Purpose

This memorandum updates the Board of Commissioners (BOC) on the follow-up actions to be taken following the May 12, 2026 Goal Setting Session. As directed, staff has drafted a comprehensive information request to Republic Services (Valley Landfills, Inc.) to address critical safety, operational, and data ambiguities in their 2024 annual submission.

### Context and Authority

Under Sections 7(b) and 7(c) of the 2020 Landfill Franchise Agreement, the franchisee must supply operational metrics to allow Benton County to monitor environmental compliance and landfill capacity. This accountability framework dates back to 1993. Following Republic Services' presentation on April 21, 2026, the Board highlighted several areas requiring clarification.

### Key Areas of Inquiry

The enclosed letter (Attachment A) requests additional information as outlined below.

**Fire Safety & Mitigation:** Requesting historical fire frequencies at Coffin Butte, origin points, and emergency response data. This query notes Republic Services' refusal to implement the Disposal Site Advisory Committee's (DSAC) requested "red flag day" monitoring and FLIR camera tracking. It provides regional context via Lane County's Short Mountain Landfill, which experienced nearly 60 battery-related fires last year despite intake four times smaller than Coffin Butte.

- **Tonnage Discrepancies:** Requesting validation of the 2024 intake data, as the reported total of 1,032,214 tons of solid waste is perfectly identical to the 2023 reported total.
- **Logistical & Customer Metrics:** Requesting exact self-haul versus commercial tonnage splits, total private vehicle counts, and data from the 2024 Oregon Recycling Collector Survey.
- **Community & Environmental Program Tracking:** Requesting baseline metrics for Household Hazardous Waste (HHW) events, Spring Recycle events, and depot glass/commingled collection volumes.
- **Financial & Infrastructure Accountability:** Requesting asset balance histories for the Landfill Environmental Trust Fund, a 10-year product intake/sales chart for the Price-Recovery Center (PRC), and an identity disclosure of the private third-party treatment plant taking over Corvallis's leachate processing after December 2025.

### **Next Steps**

Republic Services has been notified that they may submit these items as a standardized appendix to their 2024 annual report for reporting convenience. Staff will track their submission timeline, review the incoming data for compliance, and present the verified findings back to the Board upon receipt.

May 13, 2026

Bret Davis  
110 NE Walnut Blvd.  
Corvallis, OR 97330

Dear Mr. Davis:

At the Board of Commissioners' meeting on April 21, 2026, the Board had questions following the presentation of the Coffin Butte and PRC Annual Report by Republic Services. At the Board's Goal Setting Session on May 12<sup>th</sup>, the Board directed staff to prepare follow-up questions for Republic Services. At the Board's direction, staff formally requests that the questions below be addressed in the 2024 report. If more convenient, the franchisee may submit the answers to the following questions as an appendix to the report.

1. Fire Safety – The Disposal Site Advisory Committee has requested that Republic Services establish additional fire monitoring, especially during “red flag days.” A Red Flag Warning is issued by the National Weather Service to indicate critical fire weather conditions, including relative humidity (15% or less), wind gusts of 25 mph, extremely dry vegetation and dry lighting. In 2024, there were at least three such days in Adair Village. The DSAC requested that Republic Services provide extra monitoring after hours on these days. Another idea proposed is to install FLIR cameras to monitor potential fires throughout the year. Republic Services declined to implement either of these recommendations.

The threat of fires in recycling facilities, trucks, and landfills has been an increasing concern due to the prevalence of lithium-ion batteries embedded in devices. This concern has led to the passage of the HB 4144 which will require manufacturers to fund and manage a statewide battery recycling program.

For context, Lane County operates the Short Mountain Landfill in Eugene which accepts approximately four times less than the Coffin Butte Landfill's annual intake. Maya Buelow, a Lane County Waste Reduction Specialist, noted that improper disposal of lithium-ion batteries "sparked nearly 60 'thermal events' at Short Mountain last year." That is more than one per week. Lane County Solid Waste Supervisor Keith Hendrix stated that flammable materials like batteries, propane tanks, and charcoal "have been known to start as many as four fires in a single day at the Glenwood Transfer Station and Short Mountain Landfill."

The Board of Commissioners would like to know more about the frequency of fires at the Coffin Butte Landfill, how these types of fires originated, how Republic Services staff responded and how often the Adair Rural Fire and Rescue were called to assist.

2. It appears that the total tons in the 2024 report are identical to the 2023 report. Please confirm that the 2024 numbers are correct.
  - a. From the 2024 CBAR: *During 2024, the landfill accepted 1,032,214 tons of solid waste.*
  - b. From the 2023 CBAR: *During 2023 the landfill accepted 1,032,214 tons of solid waste.*
3. Please include customer information.

- a. How many tons came from private (self-haul) customers -vs- commercial customers? An example ("*Coffin Butte Landfill Tonnage by Type and County*") from the 2023 report can be found on page 9 (page 13 of the document).
  - b. Please include the number of private vehicles and total vehicles. See Pg. 7 of the 2020 CBAR for an example.
4. Provide information about the events that Republic sponsored.
  - a. HHW events (number of customers, location, tons of HHW accepted).
  - b. Spring Recycle events (# customers, locations, tons diverted) – See page 17 of the 2022 CBAR for an example.
5. Landfill Environmental Trust Fund
  - a. List the amount of the fund as of Dec. 31, 2024 as well as previous years amounts. See page 10 of the 2023 CBAR for an example.
6. PRC – Please include the chart that you have provided in the past (see page 8 of 2020 CBAR for an example) that shows how much material was taken in and how much you sold each year for the past 10 years.
7. In the past you've provided a comparison of how much material is being recovered. An example can be found on page 15 of the 2022 CBAR. Please provide an updated version for 2023 and 2024.
8. Include the 2024 Oregon Recycling Collector Survey as an appendix.
9. Depots – Can you provide a chart showing how many tons of commingled & tons of glass collected at the depots? Ideally, this is tracked from year-to-year. You may not have this, but any estimates on how many daily visits or the total number of people that use the depots. This will be very helpful as we ponder new sites.
10. The report stated that 43.2 million gallons of leachate were treated in 2024.
  - a. How many gallons went to the City of Salem versus Corvallis in 2024 (this same information will be requested for 2025)?
  - b. This is more relevant to the 2025 or 2026 report, but the report (pg. 14 of the 2024 CBAR) states, "Coffin Butte Landfill will no longer send leachate to the City of Corvallis wastewater treatment plant after December 2025. Leachate that was previously going to Corvallis is now headed to a private third-party treatment plant." Who is the private 3rd party treatment plant and how much are you sending them?
11. The 2023 CBAR stated that there were 39,006,573 cubic yards of airspace available, but the 2024 CBAR states that there are 39,591,002 tons, which is 584,429 more cubic yards. Was this due to Cell 6 being excavated?
12. The 2024 CBAR states, "We projected the landfill had 12.9 years of life remaining at the end of 2024." And on the same page it states, "The Landfill had approximately 10 years of life remaining as of

December 2025.” This means that 2.9 years of capacity was used in 2024, even as capacity increased (question 11 above). Please explain why these fluctuations have occurred.

13. Related to the previous two questions, have aerial flyovers using Lidar to measure the “waste in place” continued to be done? If so, please provide the dates or number of flights since 2021?

Thank you for your help with this matter. Please provide this information by June 15<sup>th</sup>.

Sincerely,

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Bailey Payne, Solid Waste Coordinator  
Benton County Community Development Department