

EPA Coffin Butte Inspection Report 6/2024_Summary **Prepared by Beyond Toxics 1/17/2025**

EPA conducted a follow up inspection of Coffin Butte Landfill on June 21, 2024, almost exactly two years after their inspection in 2022. EPA explicitly framed this as a "Clean Air Act Compliance" inspection. The EPA inspected a small portion of the landfill's surface area, which focused on similar locations to their original inspection in 2022. They also examined the landfill gas flare to the south across Coffin Butte Road.

Oregon and Federal rules stipulate that **any detection of methane over 500 ppm is a violation of the Clean Air Act and Oregon State Rules**. Landfill operators are required to take remediative action and bring emissions below 500 ppm within 10 days.

During the 2024 inspection, EPA found a total of **41 exceedances of 500 ppm. The vast majority of the exceedances were magnitudes over the legal maximum of 500 ppm, ranging from 1000 to 118,000 ppm.**

- Many of those exceedances occurred at locations with openings in the tarp cover caused by fabric separation, failed patch repairs, rocks and vegetation puncturing the tarp.
- Other exceedances occurred where gas extraction wells were installed and the surrounding landfill tarp cover had not been adequately sealed around those wells.
- EPA found a gas extraction well without a lid, where methane was belching out resulting in a reading of 118,000ppm (10% of air content), which is an explosive concentration of methane and 200 times over the regulatory limit.
- Some exceedances were so high that the monitoring equipment "flamed out", meaning that the inspectors had to turn off the equipment before it was damaged.
- EPA received records of odor complaints filed by community members from landfill gas for 6 months leading up to the inspection. There were complaints about landfill gas in each of those months (Dec 2023-June 2024).
- EPA inspectors reported smelling landfill gas while onsite conducting SEM measurements.
- EPA found that one of the landfill flares had a leak at a juncture in the pipe, which also resulted in exceedances above 500 ppm.

After two follow-up inspections, re-monitored areas showed that not all methane leaks returned to below 500 ppm. It is important to note that the 2024 EPA inspection monitored the same areas as the 2022 inspection and found these areas continued to leak and emit methane above 500 ppm. In two years time, Republic Services had not repaired the gas system correctly. The landfill operator appears to be managing methane reactively after inspections by regulatory agencies. This demonstrates a need for legislative intervention to improve monitoring technology, reporting and operator accountability.

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EPA inspectors photographed examples of where methane emissions exceeded state and federal law at Coffin Butte landfill.



Example 1 - 4,000 ppm Methane Exceedance at gas collection piping/equipment



Example 2 - 20,000 ppm Methane Exceedance from small tear in the tarp



Example 3 - 800 ppm Methane Exceedance measured where a weed punctured the tarp

Additional Note:

DEQ has paused their Title V Air Permit process for Coffin Butte, citing a need for additional information from Republic Services. The permit hearing originally scheduled for January 14th was cancelled indefinitely.

Other Landfill Inspections:

The EPA also inspected the Wasco Landfill and found problems with methane exceedances. Beyond Toxics has not yet written up a summary of the EPA's findings.