



Coffin Butte Landfill Title V Air Permit Renewal

Oregon Department of Environmental Quality
May 12, 2026
Virtual



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From DEQ

Michael Eisele, Environmental Engineer

Janice Tacconi, Environmental Engineer

Heather Kuoppamaki, Cleaner Air Oregon Project Engineer

Zach Loboy, Western Region Air Quality Manager

Erin Saylor, Office of Compliance and Enforcement Manager

Becka Puskas, Environmental Law Specialist

Mary Camarata, Region Solutions and tonight's Hearing Officer

Dylan Darling, Western Region Public Affairs Specialist

Chris Varley, Air Quality Public Affairs Specialist

Purpose and agenda of today's meeting

- Provide information about the draft Title V air permit renewal and enforcement case for Coffin Butte Landfill.
- Hear questions and provide answers.
- Receive oral public comments on the draft Title V permit renewal.
- If the permit renewal application meets all legal requirements, then DEQ is required to issue the permit.

As always, please speak for yourself and be respectful of others.

Public comment period

- Open through **5 p.m. Friday, May 29, 2026.**
- DEQ gives oral and written comments equal weight.
- You can provide both types of comments.
- Go to the landfill's [Title V permit public notice](#) on Your DEQ Online.



Written comment

- In Your DEQ Online search public notice only for [Submittal RID 56589](#) or “Coffin Butte.”
 - Click on “Comments” tab.
- By mail:
 - Air Quality Permit Coordinator
 - Oregon DEQ
 - 4026 Fairview Industrial Way SE
 - Salem, OR 97302
- By email: wraqpermits@deq.oregon.gov



Coffin Butte Landfill Title V Air Permit Renewal Overview

Zoom Webinar | May 12, 2026

Overview of Coffin Butte Landfill



Image from Google Earth

Overview of Coffin Butte Landfill

Five engines owned by Pacific Northwest Generating Cooperative

Flare owned by Coffin Butte

Image from Google Earth

What is a Title V air permit?

- A Title V permit is a federally mandated operating permit for facilities that emit significant amounts of air pollution.
- The permit outlines air quality requirements that the facility must meet, as well as requirements for emission limits, monitoring, recordkeeping, and reporting.

Why are we renewing the air permit?

- These permits are designed to be updated every five years.
- The current permit was written more than 15 years ago.
- The proposed permit:
 - Includes updated regulations.
 - Increase monitoring frequency.
 - Adds requirements for methane collection and control.
 - Ensures compliance with National Ambient Air Quality Standards.
 - Updates emission limits.

Permit changes since 2025 public notice

- Updated emissions from EPA's guidance and LandGEM using version 3.1 with new model parameters from 40 CFR Part 98 Subpart HH.
- Emission estimates are now through 2035.
- Reduced collection efficiency from 75 to 65% to account for future transitions from intermediate to final cover. Note that calculated collection efficiencies for 2022-2024 were between 80 and 82%.
- Added a compliance schedule for the installation of additional control equipment.

Permit emission limits

Pollutant Name	Pollutant	Previous PSEL (tons per year)	Proposed PSEL (tons per year)
Particulate Matter	PM	24	73
Small Particulate Matter	PM ₁₀	14	26
Fine Particulate Matter	PM _{2.5}	Not Regulated	12
Carbon Monoxide	CO	99	119
Volatile Organic Compounds	VOC	39	216
Sulfur Dioxide	SO ₂	39	42
Nitrogen Oxides	NO _x	39	34
Non-Methane Organic Compounds	NMOC	49	229
Total Reduced Sulfur	TRS	Not Regulated	24
Hydrogen Sulfide	H ₂ S	Not Regulated	23
Greenhouse Gases	GHG (CO ₂ e)	Not Regulated	699,300

Why are emission limits increasing?

Pollutant	PSEL Increase (tons per year)	Main Reason For Change In Limit
PM	49	Improved estimation of emissions from haul roads.
PM ₁₀	12	Improved estimation of emissions from haul roads.
SO ₂	3	Increase in landfill gas combustion.
VOC	177	Change in EPA guidance on VOC percentage.
NMOC	180	Increase in landfill gas generation.

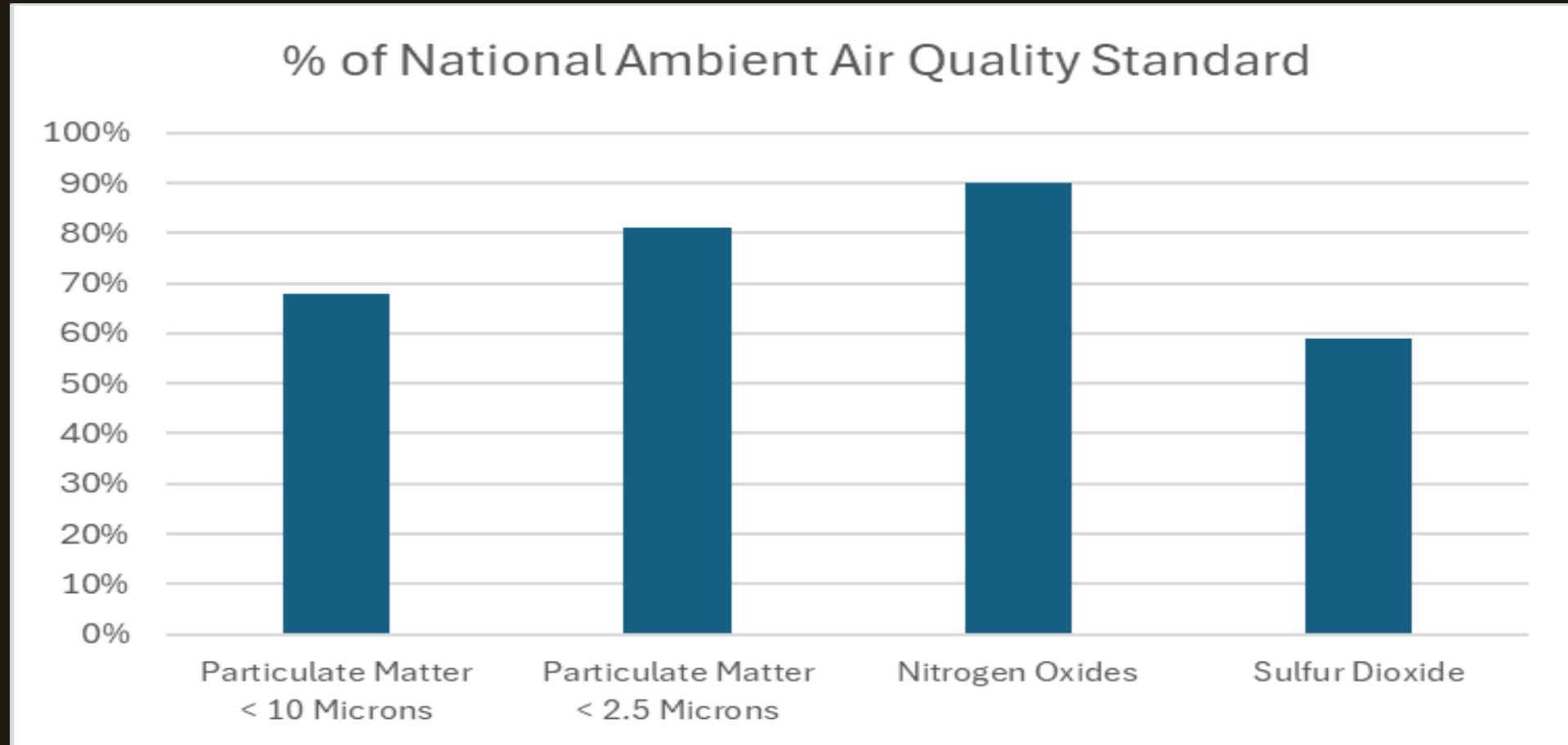
What additional pollutants are regulated?

Pollutant	PSEL (tons per year)	Main Reason For Inclusion
PM _{2.5}	12	This pollutant was not previously regulated.
GHG (CO ₂ e)	699,300	Increase in landfill gas generation and combustion, and the pollutant was not previously regulated.
TRS	24	Better data of the landfill gas concentration and additional landfill gas generation.
H ₂ S	23	Better data of the landfill gas concentration and additional landfill gas generation.

Before increasing emission limits

- DEQ validates emission calculations and modeling results.
- When emissions increase above a threshold DEQ requires modeling to ensure there is not a violation of the national ambient air quality standards.
- The following pollutants were modeled:
 - Particulate matter less than 10 micron (PM₁₀) and less than 2.5 micron (PM_{2.5}) in size.
 - Nitrogen Oxides (NO_x)
 - Sulfur Dioxide (SO₂)
 - Carbon Monoxide (CO)
 - Ozone (from VOC emissions)

Highest modeled results for each pollutant modeled



VOC and Carbon Monoxide were below levels that required a full modeling analysis.

Added permit monitoring requirements

- To minimize dust from roads DEQ has added work practice requirements including 15 mph posted speed limits and regular water application to roads.
- The flare will be tested for emissions of methane and nitrogen oxides.
- Landfill gas will be monitored for sulfur content that contributes to hydrogen sulfide and sulfur dioxide emissions.

What is Cleaner Air Oregon?

- State-only air quality permitting program adopted in 2018.
- Regulates emissions based on local risks to health.
- Over 600 Toxic Air Contaminants reported and over 200 regulated.
- Applies to “new” and “existing” facilities with AQ permits.

Existing facility call-in prioritization

Emissions Data:

- 2016 Air Toxics emissions inventories

Comparisons:

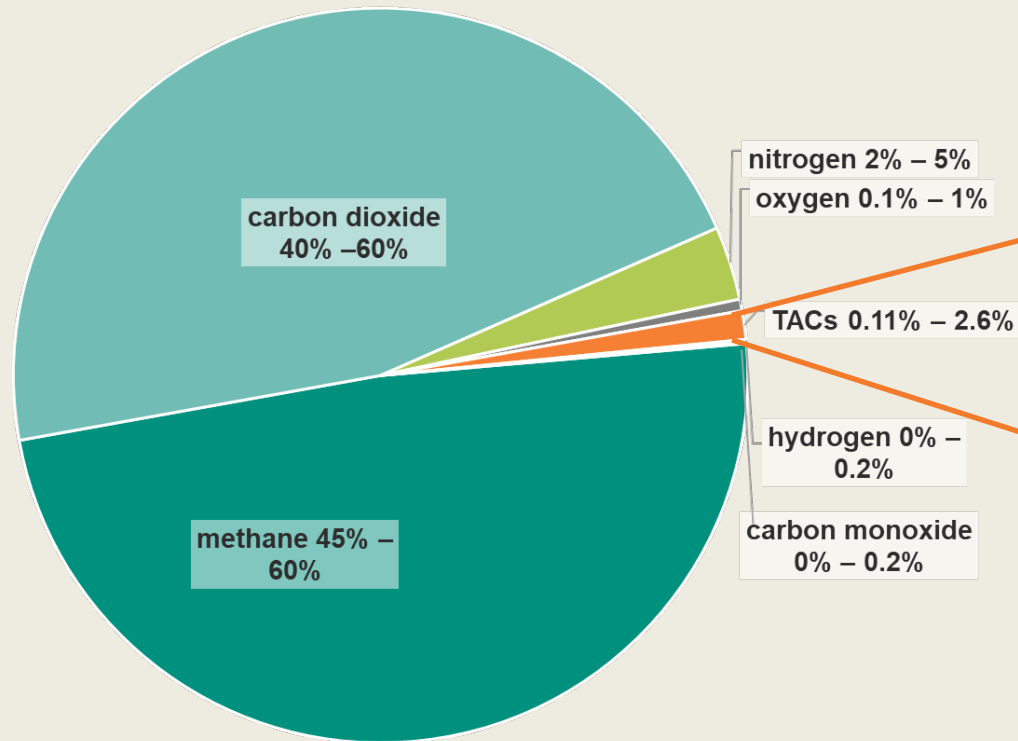
- Quantitative: screening risk and demographic information
- Qualitative: emissions controls, distance to homes, and data quality

Results:

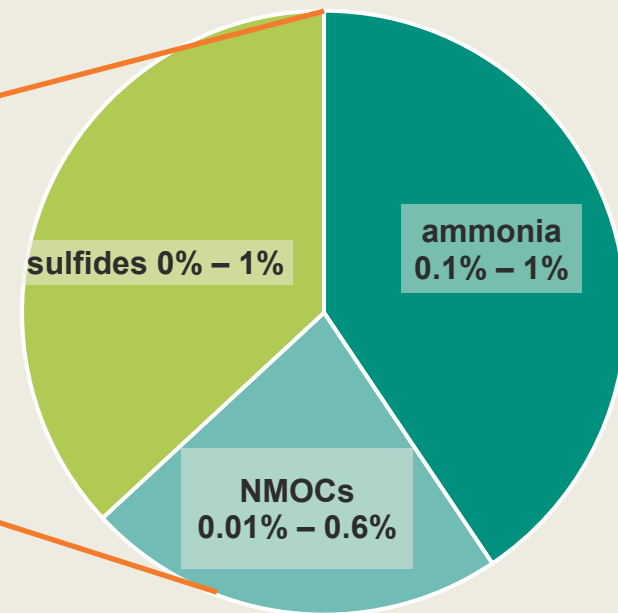
- Group 1: 20 facilities all called-in
- Group 2: 20 facilities – all but two called-in
- Group 3: 315 lower priority facilities to be called in as resources permit or if new information becomes available

Landfill gases

Landfill Gas Components



Landfill Gas Potential Toxic Air Contaminants



Cleaner Air Oregon process

**Report toxic air
contaminants**



Assess risk



**Regulate to
reduce risk**



community engagement and public involvement



Coffin Butte Landfill Enforcement Case

Erin Saylor

DEQ Office of Compliance and Enforcement

May 12, 2026

Virtual

Enforcement case timeline

- **June 2022** – First U.S. Environmental Protection Agency inspection
- **June 2024** – Second EPA inspection
 - EPA follow up information requests to Valley Landfills Inc.
- **Fall 2025** – EPA refers enforcement to DEQ
- **Nov. 6, 2025** – DEQ issues Pre-Enforcement Notice
- **March 11, 2026** – DEQ issues formal enforcement case
- **March 27, 2026** – Valley Landfills appeal of enforcement case

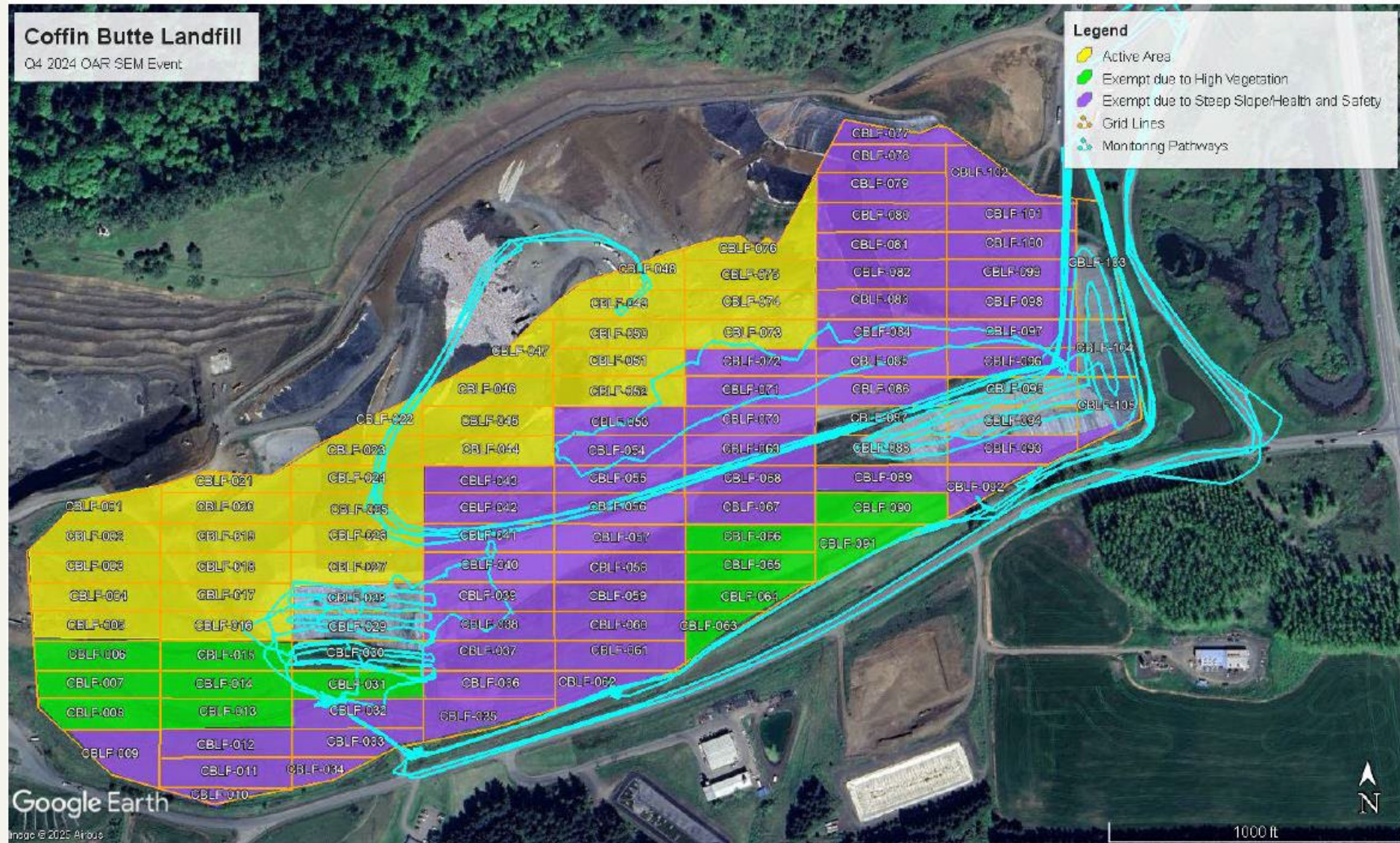
Enforcement case elements

- **14 violations alleged** (Section III)
 - Surface emissions monitoring
 - Sizing of gas collection and control system
 - Operation of gas collection and control system
 - Cover integrity
- **Order to comply** (Section IV)
- **\$3,016,128 civil penalty** (Exhibits)
 - \$2,265,528 is Economic Benefit

Surface Emissions Monitoring

DEQ alleges that Valley Landfills failed to conduct adequate surface emissions monitoring, by exempting large portions of the landfill without DEQ approval.

In addition, DEQ alleges that Valley Landfills did not consistently respond to exceedances as required.



**Fourth Quarter 2024
Initial Surface Emissions Monitoring Pathway
Coffin Butte Landfill, Corvallis, Oregon**

*Image: Valley Landfills Inc.
Q4 2024 SEM Report.*

Sizing of Gas Collection and Control System

DEQ alleges that Valley Landfills has been operating an undersized gas collection and control system, because its calculation of the “maximum expected gas generation flow rate” does not meet regulatory requirements.

Photo: Engine building (foreground) and flare (background) that combust landfill gas. Jan. 5, 2026. M. Eisele, DEQ



Operation of Gas Collection and Control System

DEQ alleges that Valley Landfills has failed to ensure its control devices were consistently maintained and operational.

*Photo: Valley Landfills' flare.
Jan. 5, 2026. M. Eisele, DEQ*



Cover Integrity

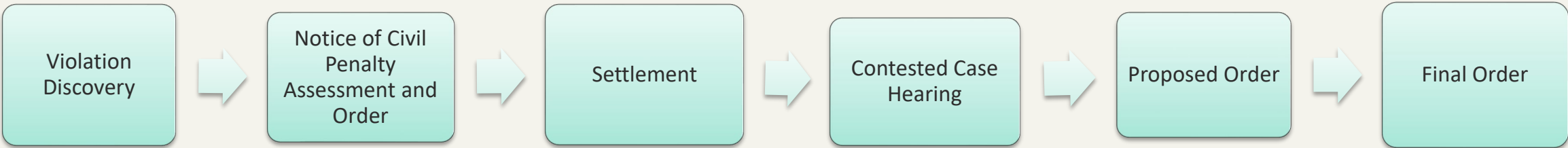
DEQ alleges that Valley Landfills did not adequately monitor and maintain the landfill cover.

Photo: Plant growing through cover. Jan. 5, 2026. M. Eisele, DEQ



What happens next?

DEQ's Enforcement Process



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Questions?

Asking a question

- You should see the following along the bottom of your screen.



- To ask a question: Type it into the Q&A or raise your hand and the host will unmute you. Press *9 if you're on the phone.

Coffin Butte Landfill Title V Air Permit Renewal Public Hearing

Recorded

Zoom Webinar | May 12, 2026

Making an oral comment

- You should see the following along the bottom of your screen.



- To make a comment: Raise your hand and the host will unmute you. Press *9 if you're on the phone.

Next steps

- DEQ will review and reply to all comments.
- EPA will review the permit.
- If the permit meets all legal requirements, DEQ is required to issue the permit.

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More information

Visit [DEQ's Coffin Butte Landfill](#) web page.



Thank you!

Title VI and alternate formats

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