



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Salem Office
4026 Fairview Industrial Dr SE
Salem, OR 97302
(503) 378-8240
FAX (503) 373-7944
TTY 711

June 25, 2025

Bret Davis
Valley Landfills, Inc.
Coffin Butted Road
Corvallis, OR 97330

Sent via email only (bdavis220203@republicservices.com)

RE: Pre-Enforcement Notice
Valley Landfill
2025-PEN-9928
02-9502-TV-01
Benton County

Dear Bret Davis:

Condition 19 of Valley Landfill, Inc.'s Title V permit limits emissions of nonmethane organic compounds (NMOC) to 49 tons in any rolling 12 month period. According to the excess emissions reports that Valley Landfill Inc. has submitted to DEQ, each month since August of 2024 Valley Landfills, Inc. has exceeded its 12 month rolling plant site emission limit for NMOC. Based on your reports, the 12 month rolling average NMOC tons per year are as follows:

September 2023 – August 2024:	51.33 tons/yr
October 2023 – September 2024:	53.16 tons/yr
November 2023 – October 2024:	54.47 tons/yr
December 2023 – November 2024:	55.23 tons/yr
January 2024 – December 2024:	55.59 tons/yr
February 2024 – January 2025:	56.75 tons/yr
March 2024 – February 2025:	59.68 tons/yr
April 2024 – March 2025:	61.46 tons/yr
May 2024 – April 2025:	62.41 tons/yr
June 2024 – May 2025:	61.29 tons/yr

The Department has concluded that Valley Landfill is responsible for the following violations of Oregon environmental law:

VIOLATION:

- (1) Exceeding the NMOC plant site emission limit in Condition 19 of the Title V permit.
This is a Class I violation according to OAR 340-012-0054(1)(g).

Class I violations are the most serious violations; Class III violations are the least serious.

DEQ recognizes that Valley Landfill Inc. submitted a significant permit modification to increase the NMOC limit in the Title V permit in February of 2023 and therefore, DEQ is not requesting any additional corrective action at this time.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide written information to me at the address shown at the top of the letter. The Department will consider new information you submit and take appropriate action.

The Department endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter, feel free to contact me in writing or by phone at 503-378-5070.

Sincerely,

Michael Eisele

Michael Eisele, PE
Environmental Engineer 3
DEQ Western Region, Salem