



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Eugene Office

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July 23, 2026

CERTIFIED MAIL RECEIPT NO.: 9589 0710 5270 1147 9522 97

Paul D. Koster
Environmental Manager
Coffin Butte Landfill
28972 Coffin Butte Road
Corvallis, OR 97330

RE: Pre-Enforcement Notice

Coffin Butte Landfill

Solid Waste permit no. 306; NPDES permit no. 101545; NPDES permit no. 1200-Z

Solid Waste 2026-PEN-10187

Water Quality Wastewater 2026-PEN-10193

Water Quality Stormwater 2026-PEN-10192

Benton County

Dear Mr. Koster:

The purpose of this pre-enforcement notice is to summarize recent violations of solid waste, stormwater, and wastewater permits and notify you that the matter is being referred to DEQ's Office of Compliance and Enforcement.

On Feb. 23, 2026, Paul Koster notified DEQ of an approximate 300 to 400-gallon leachate release to stormwater discharge drainages. The event was first noted on Feb. 23 when, during a routine maintenance check, site personnel observed the Leachate Collection and Recovery System (LCRS) pipes for Cell 5 started to overflow at the interface of the lid attached to the pipe. Site personnel resolved the release within 15-30 minutes and secured the lid. Coffin Butte Landfill proposed to resolve this issue with increased inspections and a more frequent cleaning schedule.

On May 9, 2026, Paul Koster notified DEQ of an approximately 50 to 100-gallon leachate release from an overflowing tanker truck pumping leachate from the landfill leachate collection system. The report indicated that the spill was contained, cleaned up, and did not reach any waterways.

Based on this information, DEQ has concluded that Coffin Butte Landfill is responsible for the following violations of Oregon law. Class I violations are the most serious violations of Oregon environmental law; Class III violations are the least serious.

Feb. 23 Leachate Release

Solid Waste Violation 1

The release of leachate is in violation of Oregon Administrative Rule (OAR) 340-094-0040(11)(c) that requires leachate shall be collected and treated or otherwise controlled in a manner approved by DEQ. Per OAR 340-012-065(1)(f), this is a Class I Violation.

Water Quality – Wastewater Violation

Oregon Revised Statute (ORS) 468B.025(1)(a) prohibits the placement of wastes in a location where such wastes are likely to be carried into the waters of the state by any means. Per OAR 340-012-0055(2)(c), this is a Class II violation.

Water Quality – Stormwater Violation

ORS 468B.025(2) requires compliance with DEQ water quality discharge permits. Coffin Butte Landfill failed to eliminate any non-stormwater discharges not authorized by the 1200-Z permit. Specifically, failing to prevent leachate from entering the stormwater system is a violation of Schedule A.1.k of the facility's NPDES 1200-Z Permit. Per OAR 340-012-0055(1)(d), this is a Class I violation.

May 9 Leachate Release

Solid Waste Violation

OAR 340-094-0040(11)(c) requires that leachate shall be collected and treated or otherwise controlled in a manner approved by DEQ. Per OAR 340-012-065(1)(f), this is a Class I Violation.

Water Quality – Wastewater Violation

Oregon Revised Statute (ORS) 468B.025(1)(a) prohibits the placement of wastes in a location where such wastes are likely to be carried into the waters of the state by any means. Per OAR 340-012-0055(2)(c), this is a Class II violation.

Requested Corrective Action

By August 24, 2026, DEQ requests that the landfill submit an updated operation plan to Hugh Gao, DEQ Solid Waste Engineer that addresses prevention of untreated leachate release from landfill operation.

Referral for Formal Enforcement Action

Due to the seriousness of these violations, DEQ is referring this matter to DEQ's Office of Compliance and Enforcement for formal enforcement action, which may include the assessment of a civil penalty or a department order.

This letter is not a final agency action. If you believe any of the facts in this warning letter are in error, you may provide information to me at 503-378-4977 or hugh.gao@deq.oregon.gov and/or kenzie.billings@deq.oregon.gov. DEQ will consider the new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. If you have any questions about the content of this letter, please feel free to contact me using the information provided above.

Paul D. Koster
Coffin Butte Landfill
July 23, 2026
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Sincerely,



Hugh Gao, PE
Environmental Engineer
Solid Waste



Kenzie Billings, PE
Senior Wastewater Environmental Engineer
Water Quality



Justin McGillivray
Stormwater Quality Specialist
Water Quality

ec: Ranei Nomura, Water Quality Program Manager
Stephanie Page, Watersheds and Stormwater Manager
Becky Williams, Hazardous Waste and Materials Management Manager
ORMS