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

Nov. 6, 2025

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

RE: Pre-Enforcement Notice
Valley Landfills Inc.
2025-PEN-10025
02-9502-TV-01
Benton County

Dear Bret Davis:

This Pre-Enforcement Notice (PEN) addresses landfill gas emissions compliance issues at the Coffin Butte Landfill located at Highway 99W and Coffin Butte Road north of Corvallis. In June 2022 and June 2024, the U. S. Environmental Protection Agency (EPA) conducted air quality inspections at the landfill. During both of these inspections, EPA performed surface emissions monitoring on parts of the landfill using an instrument that measures methane. EPA recorded a significant number of exceedances of the 500 parts per million (ppm) standard for methane. While these exceedances are not violations in and of themselves, they trigger required corrective actions to ensure the landfill's gas collection and control system is adequately sized and functioning properly. Following the 2024 inspection, EPA requested records from Valley Landfills Inc. (VLI) to evaluate compliance with landfill gas requirements. In May 2025, VLI submitted the requested records to EPA, and in Oct. 2025, EPA formally referred the matter to the Oregon Department of Environmental Quality (DEQ) for enforcement.

Since Sept. 27, 2021, the Coffin Butte Landfill has been subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart AAAA, Municipal Solid Waste Landfills. In addition, the landfill is also subject to Oregon's Landfill Gas Emissions requirements, Oregon Administrative Rule (OAR) Chapter 340, Division 239, which were adopted and became effective in October 2021. The state rules parallel the federal requirements in many respects and they also contain more stringent provisions.

DEQ has conducted its initial review of the information gathered by EPA, as well as other required reporting that VLI has submitted to DEQ. In addition, DEQ has reviewed the December 2021 Gas Collection and Control System Design Plan (Design Plan) for the landfill. This PEN documents the violations of state and federal landfill gas requirements that DEQ has identified, and requests additional information and corrective actions. As described below, this matter is

also being referred to DEQ's Office of Compliance and Enforcement for formal enforcement and civil penalty assessment.

Surface Emissions Monitoring & Required Corrective Action

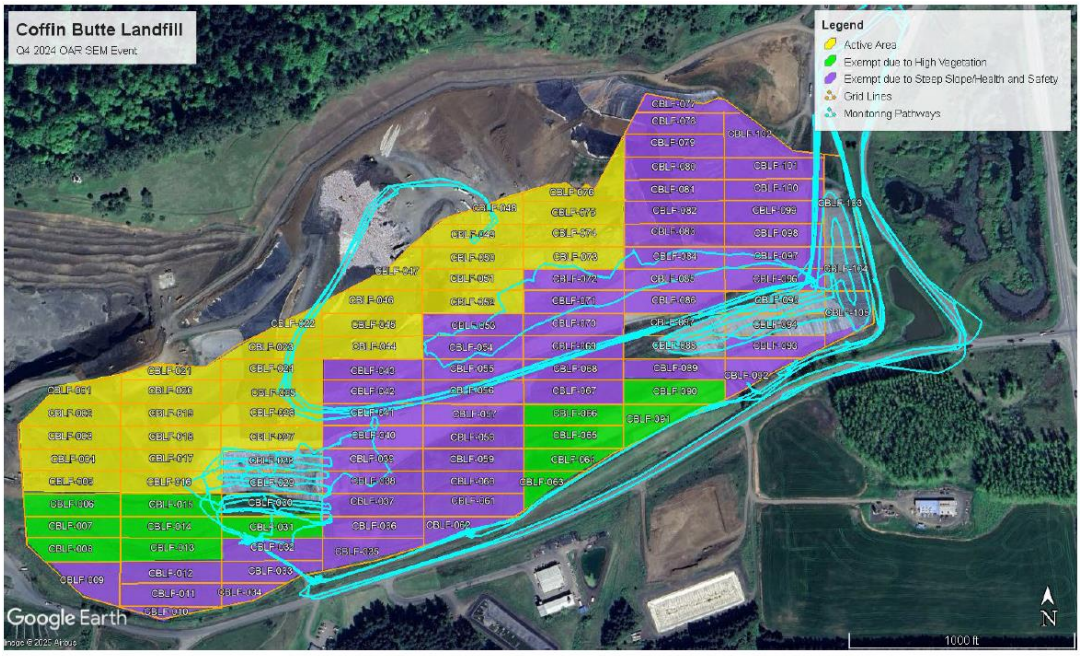
According to 40 CFR 63.1958(d) and 40 CFR 63.1960(c), VLI must conduct surface emissions monitoring (SEM) using a portable monitor at no more than 30-meter intervals throughout the collection area of the landfill. SEM must also be conducted at all cover penetrations, and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The federal requirements state that, "[a] surface monitoring design plan must be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing."

OAR 340-239-0600(1) requires VLI to conduct quarterly SEM using the procedures specified in OAR 340-239-0800(3). OAR 340-239-0800(3)(a) requires VLI to conduct SEM on the "entire landfill surface" with 25-foot spacing (approx. 7.6 meters). The landfill surface means "the area of the landfill under which decomposable solid waste has been placed, excluding the working face." OAR 340-239-0015(23). The working face means "the open area where solid waste is deposited daily and compacted by landfill equipment." OAR 340-239-0015(41). For purposes of evaluating compliance with the surface emission methane concentration limits in OAR 340-239-0200, the working face must be kept to the "minimum size and time duration as possible." OAR 340-239-0300. Any areas that VLI seeks to exclude from SEM, other than the working face, as defined in Division 239, must be approved by DEQ under OAR 340-239-0500.

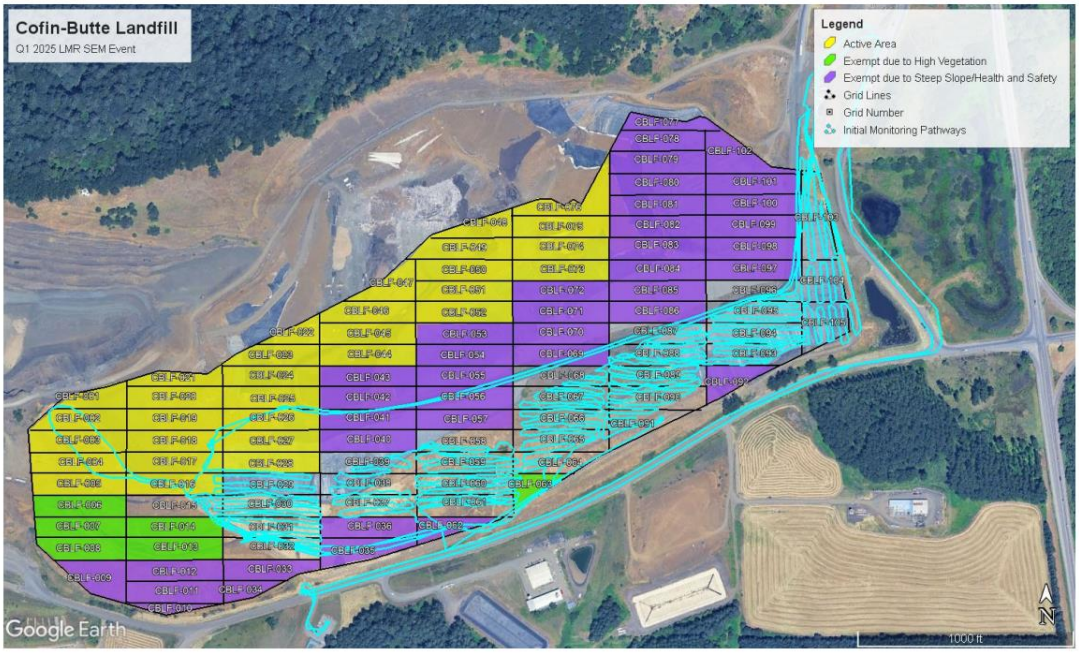
Neither EPA nor DEQ have approved exemptions to the above SEM requirements.[1]

Since at least 2022, VLI has failed to conduct SEM as required by Subpart AAAA and Division 239 by consistently excluding large areas of the landfill where SEM is required, as illustrated by the two maps below from VLIs quarterly SEM reports submitted to DEQ.

[1] In February 2020, VLI submitted a request for approval of alternatives to SEM, under federal rules that the landfill was previously subject to, 40 CFR Part 60, Subpart WWW. DEQ and EPA reviewed the proposal and responded in September 2020. Importantly, DEQ denied VLI's request to monitor at 60-meter intervals rather than 30-meter intervals. Additionally, DEQ and EPA found that VLI had provided insufficient information to consistently excluded areas of the landfill claimed as dangerous including roads, active fill area, truck traffic areas, construction areas, areas with snow or ice over, and slopes steeper than or equal to 5:1. DEQ approved the exemption subject to the following conditions: 1) that VLI must submit in its semi-annual reports to DEQ a "detailed explanation why those areas are excluded from surface monitoring, and duration of time the location is excluded from SEM"; 2) that VLI must submit a request in writing if it planned to exclude the same location more than two consecutive quarters, and 3) if the excluded areas are long-term rather than temporary, that VLI modify the design plan and get those changes approved by DEQ. DEQ has not approved any requests to exclude areas from SEM more than two consecutive quarters, nor has DEQ approved a modified design plan excluding areas from SEM over the long-term.



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



First Quarter 2025
Initial Surface Emissions Monitoring Pathway
Coffin Butte Landfill, Corvallis, Oregon

First, in both the fourth quarter of 2024 (Q4 2024) and the first quarter of 2025 (Q1 2025), VLI excluded a large area of the landfill to the north of the monitoring grid and provided no rationale for the exclusion. Second, VLI excluded areas (in green on the above maps) as "[e]xempt due to high vegetation." DEQ has not approved any such exemptions. To the contrary, DEQ's expectation is that landfills maintain vegetation such that SEM can be conducted each quarter. Third, VLI failed to monitor a large area (in yellow on the above maps) claiming it as an "[a]ctive area." Such a large area does not comport with the definition of "working face" in Division 239 and DEQ has not approved any other exemptions for active areas of the landfill. Finally, VLI claimed a large area (in purple on the above maps) as "[e]xempt due to steep slope/health and safety." While the safety of monitoring personnel is important, DEQ has not approved any exemptions from SEM on this basis. DEQ further notes that much of the area in the southern portion of the landfill that was claimed as exempt from SEM due to high vegetation or safety reasons in Q4 2024 was successfully monitored in Q1 2025.

In addition, during both EPA inspections – in June 2022 and June 2024 – EPA documented a significant number of exceedances of the 500 ppm standard as compared to VLI's own SEM. For example, on June 23, 2022, EPA monitored only a portion of the landfill and documented 61 exceedances, 21 of which were above 10,000 ppm methane. In contrast, VLI's own SEM of the entire landfill, conducted on June 9, 2022, detected only 6 exceedances of 500 ppm methane. On June 21, 2024, EPA monitored only a portion of the landfill surface and found 41 exceedances of 500 ppm or higher. In contrast, in its own SEM of the landfill on March 26 and 29, 2024, VLI identified only 11 exceedances.

Based on the above, in Corrective Action #1 below, DEQ is requesting that VLI submit a significant permit modification to allow for SEM with a drone. In December 2022, EPA approved Other Test Method 51 (OTM 51) as an alternative to the SEM requirements in 40 CFR Part 63, Subpart AAAA and other federal SEM requirements. More recently, DEQ has worked with the Lane County Regional Air Protection Agency to develop conditions that incorporate Oregon's Division 239 SEM requirements and allow for drone monitoring. DEQ is optimistic about the improved accuracy, efficiency, and safety benefits of drone monitoring. Based on VLI's significant noncompliance with SEM requirements and the need to safely conduct comprehensive SEM, DEQ is requesting that VLI submit a permit modification application to allow for drone monitoring.

SEM is required, according to the federal Subpart AAAA requirements, to ensure that the landfill's gas collection and control system (GCCS) is being operated so that the methane concentration is less than 500 ppm above background at the surface of the landfill. Under Oregon's Division 239 requirements, VLI must demonstrate consistent compliance with both a 500 ppm instantaneous methane concentration limit and a 25 ppm average methane concentration limit based on "integrated" SEM, which takes the average of SEM readings within a 50,000-square-foot grid. OAR 340-239-0200(1); OAR 340-239-0800(3).

Exceedances of 500 ppm (instantaneous) or 25 ppm (integrated) trigger remonitoring and corrective action requirements. 40 CFR 63.1960(c); OAR 340-239-0600(1). If those requirements are not followed, the landfill is in violation of the compliance standards. 40 CFR

63.1958(d); 40 CFR 63.1960(c)(4); OAR 340-239-0200(1). Following an exceedance, VLI must take corrective actions such as cover maintenance or repair or well vacuum adjustments. These actions must be documented and reported to DEQ semi-annually, including the "action taken to repair the leak" and "date of repair." OAR 340-239-0700(3)(C)(A). Since 2022, VLI has failed to conduct remonitoring on all required occasions. For example, in both the Q3 2022 and Q4 2022 SEM reports, VLI stated that remonitoring was not conducted "due to weather." Where remonitoring has been conducted and a lower methane concentration achieved, VLI has not provided the required detail in its semi-annual reports to DEQ regarding the specific corrective actions taken and the dates those actions were completed. Importantly, if remonitoring shows a third exceedance of either the 500 ppm or 25 ppm standard, VLI must install a new or replacement collection device and must demonstrate compliance no later than 120 days after detecting the third exceedance. 40 CFR 63.1960(c)(4)(v); OAR 340-239-0600(1)(a)(C)(ii) and (1)(b)(B)(ii). The installation date and location of each well installed as part of a gas collection system expansion must be reported semi-annually to DEQ. 40 CFR 63.1981(h)(6); OAR 340-239-0700(3)(c)(A).

The attached Tables show the instances where VLI's SEM reports show three exceedances of the 500 ppm (instantaneous) or 25 ppm (integrated) standard, requiring gas collection system expansion with a 120-day deadline. VLI has been reporting to DEQ semi-annually on system expansion and new wells installed and decommissioned. However, it is difficult to correlate the locations of the new wells installed with the locations where three exceedances of a standard (500 ppm or 25 ppm) triggered a required expansion. DEQ is requesting that VLI submit this information in response to Information Requests #2-4, below.

Gas Collection and Control System

Subpart AAAA requires VLI's gas collection and control system (GCCS) to be designed to handle the maximum expected gas generation flow rate from the entire area of the landfill that warrants control over the intended use period of the GCCS. 40 CFR 63.1959(b)(2)(ii)(B)(i). The maximum expected gas generation flow rate is calculated according to the equations in 40 CFR 63.1960(a)(1). Oregon's Division 239 standard for GCCS design points to the same maximum expected gas generation flow rate calculation. OAR 340-239-0110(1)(c)(C). EPA's Landfill Gas Emissions Model (LandGEM) may be used to perform the calculations. However, LandGEM runs used to determine GCCS design must be consistent with rule requirements.

In December 2021, VLI submitted an amended Design Plan for the Coffin Butte landfill to DEQ (2021 Design Plan). The calculations in the 2021 Design Plan that VLI has used to determine the sizing of the installed GCCS at the Coffin Butte landfill are inconsistent with rule requirements. Specifically, the calculations in the 2021 Design Plan did not include waste placed in the landfill prior to 1998, did not use total waste (instead the calculations included separate runs for modified bulk waste construction and demolition waste), and did not use model parameters required by rule. In addition, the 2021 Design Plan assumes a 75% collection efficiency for GCCS design. The calculations in Subpart AAAA and Division 239 include no such assumption; rather, they require GCCS design for 100% of the maximum expected gas generation flow rate. As a result, the 2021 design and the subsequent installation and operation of the Coffin Butte

landfill GCCS is undersized as compared with the maximum expected gas generation flow rate. Also, VLI modified the GCCS by installing and commencing operation of a new enclosed flare on August 6, 2024. However, VLI did not submit an amended Design Plan to reflect that change as required under OAR 340-239-0110(1)(b).

DEQ appreciates the updated LandGEM runs that VLI submitted on October 13, 2025. DEQ will continue to work with VLI to review updated calculations towards an approvable GCCS design and a GCCS expansion schedule.

DEQ also has concerns about VLI's operation and monitoring of the Coffin Butte landfill GCCS.

According to 40 CFR 63.1955(c), VLI must operate the GCCS consistent with good air pollution control practices such that all collected gases are vented to a control system. According to 40 CFR 63.1955(f) VLI must operate the control system at all times when the collected gas is routed to the system. According to OAR 340-239-0110(2)(a)(A), VLI must route all collected gas to a gas control device or devices and operate the GCCS continuously except during well raising or during temporary shutdown for repairs. OAR 340-239-0110(2)(a)(E) requires that in the event the GCCS is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within one hour of the GCCS not operating.

The GCCS for the Coffin Butte landfill consists of a collection system, a "treatment system" comprised of five engines that combust landfill gas to generate energy (operated by Pacific Northwest Generating Cooperative under a separate DEQ air quality permit), and two flares that also combust landfill gas. As discussed above, in August 2024, VLI replaced the two open flares (known as flare #1 and flare #2) with an enclosed flare that has a higher destruction efficiency, as required by Division 239.

VLI has failed to operate components of the GCCS consistent with the Subpart AAAA and Division 239 requirements described above. Specifically, VLI has reported extensive downtime events for its flares. For example, in the first half of 2022 there were eight events where flare #1 was down for more than 100 hours during each event, with one of the events extending over 428 hours. The collection system was only down for an hour and thirty minutes during that same six-month time period in 2022. During the first six months of 2025, the new enclosed flare was offline intermittently for a total time period that adds up to over 15 calendar days. The collection system was only down for approximately 17 hours during that same six-month time period in 2025.

According to 40 CFR 63.1961(a) and OAR 340-239-0110(3), VLI is required to conduct monthly monitoring at each wellhead for gauge pressure, temperature, nitrogen and oxygen. These parameters help indicate the performance of the well and may require corrective action.

In its semi-annual compliance report for the first half of 2025, VLI reported that it failed to monitor 8 wellheads; some of the wellheads were not monitored for multiple months during

January-June 2025. In a letter dated Sept. 12, 2025, Valley Landfill submitted a permit deviation report that informed DEQ well 2V000114 was not monitored in August of 2025.

Landfill Cover Integrity

The Coffin Butte landfill uses soil, which is at least 12 inches thick, as interim cover in areas where waste has been placed but is not at final grade. Some areas are also covered on an interim basis with plastic to reduce leachate generation. VLI has placed final cover in several cells (or portions of cells) in the southern portion of the landfill where waste is no longer being added. Maintaining the landfill cover helps minimize landfill gas leaks to the atmosphere.

According to the Division 239 rules, VLI was required to submit a Methane Generation Report to DEQ by October 1, 2022. According to OAR 340-239-0700(f)(D), the Methane Generation Report was required to include the results of a visual inspection of the landfill cover and any actions done to fix leaks and minimize releases. According to OAR 340-239-0100(5)(a)(C), VLI must maintain the landfill cover so as to minimize landfill gas emissions and visually inspect the landfill surface annually for signs of methane releases including distressed vegetation, cracks or seeps. According to 40 CFR 63.1960(c)(5) and OAR 340-239-0600(4), VLI must implement a program to monitor cover integrity and implement cover repairs as necessary on a monthly basis.

DEQ has reviewed VLI's reports regarding its monthly visual inspections of the landfill cover from January 2021 through the present. With the exception of a single report for September 2024, VLI has consistently reported conducting monthly inspections of the landfill cover, with "no issues" or "no holes" found during the inspections. In contrast, during EPA's June 2024 inspection of the landfill, EPA and DEQ inspectors observed many holes in the landfill cover and a significant number of trees growing through the plastic cover. The EPA inspector who prepared the inspection report stated: "I noted that there were a number of plants growing out of the cover material at the top of the western side of the landfill in the area along the edge of Cell 3 and Cell 5. Some of the plants were between 1.5 to 3 feet tall."

Fugitive Dust

Over the last several years, DEQ has received many complaints from the public regarding fugitive dust from the Coffin Butte landfill. One of the primary concerns of complainants, which is supported by photographs, is that when tipping occurs, some waste loads generate a significant plume of dust. Condition 4 of VLI's Title V permit requires VLI to take reasonable precautions to prevent particulate matter, including dust, from becoming airborne, and lists a number of strategies that may be used. Condition 5 of the Title V permit requires weekly visual surveys for any sources of excess fugitive emissions using EPA Method 22. DEQ is requesting records of these Method 22 surveys in Information Request #6, and an evaluation and plan to control fugitive emissions generated by tipping dry loads in Corrective Action #5.

Based on the above, DEQ has concluded that Valley Landfill, Inc. is responsible for the following violations of Oregon environmental law:

VIOLATIONS:

Surface Emissions Monitoring & Required Corrective Action

(1) Failure to conduct quarterly surface emissions monitoring as required by 40 CFR 63.1958(d), 40 CFR 63.1960(c), OAR 340-239-0600(1) and OAR 340-239-0800(3). This is a Class I violation according to OAR 340-012-0054(1)(tt).

(2) Failure to conduct remonitoring and take required corrective actions when surface emission monitoring instantaneous or integrated grid sampling showed an exceedance, in violation of 40 CFR 63.1960(c) and OAR 340-239-0600(1). This is a Class I violation in accordance with OAR 340-012-0054(1)(uu).

Gas Collection and Control System

(3) Failure to install and operate a gas collection and control system designed to handle the maximum expected gas generation flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control system equipment, in violation of 40 CFR 63.1959(b)(2)(ii)(B)(i), 40 CFR 63.1960(a)(1) and 340-239-1001(1)(c)(C). This is a Class I violation in accordance with OAR 340-012-0054(1)(pp).

(4) Failure to amend the landfill gas collection and control design plan after modifying the existing gas collection and control system, in violation of OAR 340-239-0110(1)(b). This is a Class I violation according to OAR 340-012-0054(1)(oo).

(5) Failure to operate the control system at all times when the collected gas is routed to the system, in violation of 40 CFR 63.1955(f), 40 CFR 63.1955(c), and OAR 340-239-0110(2)(a)(A). This is a Class I violation according to OAR 340-012-0054(1)(qq).

(6) Failure to conduct monthly monitoring at each wellhead for gauge pressure, temperature, nitrogen and oxygen, in violation of 40 CFR 63.1961(a) and OAR 340-239-0110(3). This is a Class I violation according to OAR 340-012-0054(1)(rr).

Landfill Cover Integrity

(7) Failure to maintain the landfill cover so as to minimize landfill gas emissions and to implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis, in violation of 40 CFR 63.1960(c)(5), OAR 340-239-0600(4), OAR 340-239-0100(5)(a)(C). This is a Class I violation according to OAR 340-012-0053(1)(b).

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

Information Request

According to Condition G.23 of your Title V Permit and OAR 340-214-0110, please submit the following information via email to Mike Eisele at DEQ (michael.eisele@deq.oregon.gov) by November 26, 2025:

1) For Jan. 1, 2022, to the present, submit records of all corrective actions taken in response to exceedances of the standards in OAR 340-239-0200(1), including the action taken to repair the leak and the date of the repair, as required by OAR 340-239-0700(2)(a)(c).

2) For each location in the attached Table 1 and Table 2, please provide the installation date for each new well installed, the name or label for the new well, or a statement that no well has been installed in that location.

3) Submit a map that shows all of the new wells installed since Jan. 1, 2022. The map should include labels or a key that corresponds to the information requested in item 1, above.

4) Submit a map that shows all of the wells decommissioned since Jan. 1, 2022.

5) Submit a copy of all work orders or invoices for cover repairs completed from Jan. 1, 2022, to the present.

6) Submit a copy of all Method 22 records according to Conditions 5 and 26 of the Title V permit form Jan. 1, 2022, to the present.

Corrective Actions Requested:

1) By Jan. 1, 2026, submit a significant permit modification via YourDEQOnline (YDO) to use drone technology, as approved by EPA in OTM-51, to complete surface emissions monitoring required under 40 CFR Part 63, Subpart AAAA and OAR Chapter 340, Division 239.

2) By Jan. 1, 2026, submit an operation and maintenance plan for the flare to ensure compliance with 40 CFR 63.1955(f), 40 CFR 63.1955(c), and OAR 340-239-0110(2)(a)(A).

3) By Feb. 1, 2026, submit an amended design plan to DEQ for approval that meets the requirements of 40 CFR Part 63, Subpart AAAA and OAR Chapter 340, Division 239. Specifically, the amended design plan must include a GCCS design to handle the maximum expected gas generation flow rate calculated according to 40 CFR 63.1960(a)(1). With the amended design plan submittal, submit a proposed schedule for installing and operating an expanded collection and control system.

4) By Feb. 1, 2026, have a third party with expertise in landfill design and maintenance conduct a full inspection of the Coffin Butte landfill cover integrity, including areas under

both interim and final cover, and submit a report of the inspection findings to DEQ. The report must include: 1) a review of the cover type and cover integrity for each grid of the landfill, 2) documentation, including photographs for each grid showing any cracks, holes or other penetrations in need of repair, 3) a list of needed repairs to restore cover integrity, and 4) recommendations for ongoing cover monitoring and maintenance. Submit the report for DEQ approval along with a proposed timeline for implementing cover repairs.

5) By Feb. 1, 2026, have a third party with expertise in landfill operations and dust control conduct a study of fugitive dust control management and options for the Coffin Butte landfill. The study must include: 1) a review of the types of loads received at the Coffin Butte landfill that generate significant dust plumes when tipped, 2) a review of VLI's current practices for managing fugitive dust from tipping operations, 3) a review of industry best practices for managing fugitive dust from tipping operations, and 4) recommendations for fugitive dust management at the Coffin Butte landfill. Submit the study, along with a Fugitive Dust Control Plan for the Coffin Butte landfill to DEQ for approval.

As described above, VLI violated multiple important state and federal requirements aimed at controlling landfill gas emissions. One of the major constituents of landfill gas is methane—a potent greenhouse gas that contributes to climate change. Landfill gas also includes nonmethane organic compounds, some of which are known or suspected carcinogens and may cause other serious health effects. Landfill gas emissions also affect human welfare due to odor. Therefore, failure to control landfill gas emissions from the Coffin Butte landfill as required has significant environmental and public health impacts.

This Pre-Enforcement Notice is not a final agency action. The violations cited above are being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a DEQ order. A formal enforcement action may include a civil penalty assessment for each day of violation. Your timely and responsive action on these items will be taken into consideration in any civil penalty assessment issued by DEQ.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide written information to me. DEQ will consider new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. Should you have any questions about compliance or about the content of this letter, you may contact me at 503-378-5070 or michael.eisele@deq.oregon.gov.

Sincerely,

Mike Eisele

Michael Eisele, PE
Environmental Engineer 3

cc: Zach Loboy, DEQ
Erin Saylor, DEQ
Becka Puskas, DEQ

Table 1. Locations with three exceedances of 500 ppm (instantaneous) requiring system expansion

Quarter	Location with three exceedances of 500 ppmv	Latitude	Longitude	Deadline for system expansion
Q2 2023	4V000055	44.70118172	-123.2275967	10/3/2023
Q2 2023	2H000086	44.69953174	-123.2315083	10/3/2023
Q2 2023	2H000087	44.69954171	-123.231515	10/3/2023
Q2 2023	3ARC0076	44.69906671	-123.232757	10/3/2023
Q4 2023	2V000089	44.70056003	-123.22847	4/13/2023
Q4 2023	4V000055	44.70118004	-123.2276	4/13/2023
Q1 2024	4V000055	44.70118004	-123.2276	7/24/2024
Q1 2024	2V000089	44.70056003	-123.22847	7/24/2024
Q1 2024	3A0V0078	44.69873998	-123.2332	7/24/2024
Q1 2024	3V000100	44.69902103	-123.232619	7/24/2024
Q1 2024	2H000086	44.69952998	-123.23151	7/24/2024
Q1 2024	2V00100S	44.69920753	-123.2314313	7/24/2024
Q1 2024	2H000101	44.69929654	-123.2308005	7/24/2024
Q1 2024	3ARC0074	44.69944272	-123.2320347	7/24/2024
Q2 2024	2V000121	44.700192	-123.230313	11/13/2024
Q2 2024	2H000121	44.699896	-123.230941	11/13/2024
Q2 2024	3A0V0078	44.69874	-123.2332	11/13/2024
Q2 2024	2V000111	44.70022	-123.228817	11/13/2024
Q2 2024	3V000104	44.699546	-123.231715	11/13/2024
Q2 2024	2H000122	44.69993	-123.230945	11/13/2024
Q2 2024	4V000055	44.70118	-123.2276	11/13/2024
Q2 2024	2V00100S	44.6992075	-123.2314313	11/13/2024
Q2 2024	2H000087	44.69954	-123.23152	11/13/2024
Q2 2024	2V000123	44.700041	-123.230776	11/13/2024
Q2 2024	2V000089	44.70056	-123.22847	11/13/2024
Q2 2024	3ARC0074	44.6994427	-123.2320347	11/13/2024
Q2 2024	2H000086	44.69953	-123.23151	11/13/2024
Q2 2024	2V000124	44.700378	-123.229938	11/13/2024
Q2 2024	3V000093	44.6983595	-123.234183	11/13/2024
EPA Q2 2024	A27	44.698351	-123.234173	11/13/2024
Q2 2025	Q2 SEM-23	44.7024	-123.2268	10/25/2025
Q2 2025	Q2 SEM-20	44.70026	-123.23	10/25/2025
Q2 2025	Q2 SEM-25	44.70205	-123.22805	10/25/2025
Q2 2025	Q2 SEM-27	44.70131	-123.22791	10/25/2025
Q2 2025	Q2 SEM-47	44.70144	-123.23013	10/25/2025

Q2 2025	Q2 SEM-16	44.70015	-123.23068	10/25/2025
Q2 2025	Q2 SEM-32	44.70109	-123.2284	10/25/2025
Q2 2025	Q2 SEM-13	44.70042	-123.23008	10/25/2025
Q2 2025	Q2 SEM-19	44.70002	-123.23082	10/25/2025
Q2 2025	Q2 SEM-121	44.70049	-123.23004	10/25/2025
Q2 2025	Q2 SEM-38	44.70122	-123.22891	10/25/2025

Table 2. Locations with three exceedances of 25 ppm (integrated) requiring system expansion

Quarter	Location with three exceedances of 25 ppm	Deadline for system expansion
Q1 2023	CBLF-048	7/28/2023
Q1 2023	CBLF-050	7/28/2023
Q1 2023	CBLF-051	7/28/2023
Q1 2023	CBLF-054	7/28/2023
Q1 2023	CBLF-071	7/28/2023
Q1 2023	CBLF-072	7/28/2023
Q1 2023	CBLF-073	7/28/2023
Q1 2023	CBLF-074	7/28/2023
Q1 2023	CBLF-075	7/28/2023
Q1 2023	CBLF-076	7/28/2023
Q1 2023	CBLF-084	7/28/2023
Q2 2023	CBLF-027	10/3/2023
Q2 2023	CBLF-040	10/3/2023
Q2 2023	CBLF-052	10/3/2023
Q2 2023	CBLF-053	10/3/2023
Q2 2023	CBLF-054	10/3/2023
Q2 2023	CBLF-070	10/3/2023
Q2 2023	CBLF-071	10/3/2023
Q2 2023	CBLF-072	10/3/2023
Q2 2023	CBLF-080	10/3/2023
Q2 2023	CBLF-083	10/3/2023
Q2 2023	CBLF-084	10/3/2023
Q3 2023	CBLF-043	1/27/2024
Q3 2023	CBLF-044	1/27/2024
Q3 2023	CBLF-071	1/27/2024
Q4 2023	CBLF-022	4/6/2024