



February 2nd, 2023

Mike Sheldon
DTG Limited Purpose Landfill
P.O. Box 14203
Mill Creek, WA 98082

RE: Yakima Health District air emission monitoring requirement of DTG LPL due to recent site visits.

Dear Mike Sheldon,

Based on observations on previous site visits by Yakima Health District (YHD) and Department of Ecology (DOE), it has become apparent that there may be a possible subsurface fire at DTG on the western slope of the closed Phase 1. Attached to this letter are reports on two of these site visits in regards to investigating the cracks on the northwestern slope of the closed Phase 1.

Surface observations show the following on the western slope of Phase 1:

- Numerous surface cracks ranging in various widths, some upwards of six inches across, and of various lengths, some greater than 20-feet long.
- A significant amount of venting coming from some surface cracks, leaving blackened residue around the crack edges.
- Thermal imaging showing a large temperature gradient between surface soil temperature in the immediate area of the cracks, and the surface soil temperature at a short distance from the cracks.
- Green grass growing in the vicinity of the surface cracking during winter months.

These observations point to significant heat generation subsurface on the western slope of Phase 1 specifically in the already known affected MTCA cleanup site. While there are routine measures to cover these cracks, it is a concern of regulators that emissions could

possibly be leaving the landfill. The possibility of a subsurface fire has been discussed multiple times by regulatory agencies. Because of the neighbor proximity to this facility and worker safety, it is imperative that we prioritize human health and the environment to ensure harmful gas emissions are not affecting ambient air quality at the site or off site. A number of odor complaints have come in over the last year regarding this and it is the responsibility of YHD and DTG to ensure that their health is not being impacted by emissions leaving the landfill. Workers doing routine maintenance or work on the slope must know when to change operations due to potentially hazardous working conditions.

Based on the surface observations, YHD is requiring DTG to develop a plan to investigate and determine if there is a subsurface fire in Phase 1 through continuous, subsurface, and ambient air monitoring. This air monitoring network proposal should include mechanisms for continuously monitoring ambient air quality at the MTCA cleanup site, the property boundary to the North, and the draw where MW-4 is located. Additionally, continuously subsurface monitoring to investigate the extent of affected area. Subsurface monitoring can be achieved through a sufficient amount of “bar hole punches” into waste to adequately characterize the area. The minimum constituents to be required are Carbon Monoxide, Hydrogen Sulfide, Volatile Organic Compounds, temperature, and Oxygen. Once this network is in place, YHD will require data reporting at least twice per week. As of now, YHD is not aware of an issued permit regarding air emissions by Yakima Regional Clean Air Authority (YRCAA). Observations show that there are emissions being released. YHD highly recommends DTG working with YRCAA to remedy any concerns with the plan and/or the data resulting after implementation.

It is **the responsibility of the facility to be in compliance** with WAC 173-350 and the conditions of the permit. Under RCW 70A.205.140, the rule gives authority to YHD by stating:

Any permit for a solid waste disposal site issued as provided herein shall be subject to suspension at any time the jurisdictional health department determines that the site or the solid waste disposal facilities located on the site are being operated in violation of this chapter, the regulations of the department, the rules of the department of agriculture, or local laws and regulations.

Please submit a work plan as described above, and a timeline for implementation, to YHD for review within fourteen (14) days of receipt of this letter.

Thank you for continuing to work with YHD on these matters to ensure compliance. If you have any questions, please contact steven.newchurch@co.yakima.wa.us or (509) 249-6504.

Sincerely,



Steven Newchurch
Environmental Health Specialist

cc: Washington State Department of Ecology
Yakima Regional Clean Air Authority

Enclosures: DOE January 19th, 2023, Site Visit
YHD/DOE January 25th, 2023, Site Visit