



July 18, 2023

Ian Sutton
Director of Engineering
DTG Recycle
P.O. Box 14203
Mill Creek, WA 98082

RE: DTG Limited Purpose Landfill Ongoing Fire Response (HSW2019-00020).

Dear Ian Sutton,

DTG Limited Purpose Landfill (DTG LPL) started the fire remediation effort on July 5, 2023. Throughout the DTG LPL fire response, there have been certain concerns iterated by the Yakima Health District (YHD), Washington State Department of Ecology (Ecology), and Yakima Regional Clean Air Authority (YRCAA) that are yet to be met and/or addressed sufficiently. With technical assistance from Ecology and Puget Sound Environmental PLLC (PSENV), this letter outlines YHD's concerns and resulting requirements.

THERMAL IMAGING RESULTS

On June 26, 2023, Ecology conducted drone thermal imaging of the closed Phase 1 cell. Ecology was on-site early in the morning to prevent solar radiation interference. The results of this event show indications of possible fire activity substantially further south on the cell from the currently known fire area and substantially further north on the cell from the currently known fire area. Images of the known area of fire activity are attached as enclosure (1). The current fire remediation operation being conducted does not cover these additional areas of concern and these areas are not being delineated or monitored.

On-site reports from DTG staff have shown there is settlement and cracking on the Northeast point revealing possible signs of fire activity. The thermal images of this area are attached as enclosure (2). To clarify, this area is adjacent to AMB-6. DTG staff have stated multiple feet of cover soil were put on the cracks before one bar-hole punch monitor was installed. Data from this monitor may be misleading as it cannot reach the area where original cracks were observed and even further from existing waste where fire activity may be present.

Current monitoring locations on the Southwest point of the Phase 1 cell reveal signs of fire activity. The thermal images of this area are attached as enclosure (3). To clarify, this area includes and extends south of GP-24 and GP-25. Thermal imaging showed signs of fire activity on the Southwest point and wrapping around onto the South facing slope.

It is clear there are indications of fire activity at other locations of Phase 1 that have not been investigated. YHD cannot delay the investigation of Phase 1 due to the current fire remediation operation on site. If there are other locations with fire activity, those areas must be met with the same level of attention as the currently known fire area. **DTG is required to propose a written plan to investigate the entirety of the closed Phase 1 cell for fire activity by August 15, 2023.**

SURVEYING

DTG has stated that surveying will take place to document the final thickness of the fire remediation cover. Surveying can also provide definitive information of rapid settlement across the entire cell. Once the current fire remediation plan is complete, regular surveying is required for monitoring. These surveys will allow for monitoring the fire remediation cover and any other potential areas of Phase 1 where settlement may be occurring. **DTG is required to conduct regular surveying of the entire closed Phase 1 cell to monitor and investigate settlement. Submit a schedule of surveying events by August 15, 2023.**

CROSS INTERFERENCE

In the weekly fire response conference call on July 13, 2023, conversations on cross interference by Hydrogen Sulfide and Carbon Monoxide iterated the same issues that have been previously discussed. YHD is aware CO and H₂S provide interference on data reporting. However, the use of mitigation on meters is not being reported. **DTG is required to document the use of scrubbers, or absence, or any other method of interference mitigation on data reporting sheets beginning on July 24, 2023.**

REPORTING FREQUENCY

Landfill Fire Control Inc (LFCI) indicated on recent conference calls that the conditions of fire activity may change due to the fire remediation operation. Additionally, LFCI indicated increasing the frequency of gas probe monitoring should occur to monitor if conditions are changing. YHD and Ecology agree increased monitoring is necessary. **DTG is required to record and report gas probe data to YHD, Ecology, and YRCAA twice per week starting the week of July 24, 2023.**

HOT ZONE AREA

DTG has been approved to start work on the fire remediation plan. However, it has not been made clear the methodology of addressing the hot zone area that encroaches on the stormwater control canal, has the highest fire activity, steepest slopes, and least accessibility. This hot zone has a much higher potential risk to workers and public safety. To clarify, this area is north of GP-3, above the stormwater control canal, and below the lower access road. **A written plan is required by DTG detailing how fire remediation will be completed in the hot zone at least seven (7) days prior to moving into the area for soil cover. DTG must also notify YHD, Ecology, and YRCAA three (3) days prior to work starting in the hot zone.**

COMPLETION DATE

It is imperative regulatory agencies are aware of projected dates to begin and finish work in these areas to be better prepared. To ensure progress is being made, **DTG must submit a projected timeline and completion date of the fire remediation operation by August 1, 2023.** This should include significant milestones in completing specific phases of the operation. YHD is aware the timeline may change. If something occurs to shorten or extend phases, or the timeline completely, DTG will be required to submit a redefined timeline.

If you have any questions, please contact steven.newchurch@co.yakima.wa.us or (509) 249-6504

Sincerely,



Steven Newchurch
Environmental Health Specialist

cc: Landfill Fire Control Inc
Parametrix
Washington State Department of Ecology
Yakima Regional Clean Air Authority
Puget Sound Environmental PLLC

Enclosures: (1) Thermal images of currently monitored fire area taken by Ecology on June 26, 2023.
(2) Thermal images of Northeast point of closed Phase 1 cell taken by Ecology on June 26, 2023.
(3) Thermal images of Southwest point of closed Phase 1 cell taken by Ecology on June 26, 2023.