November 1, 2021 CERTIFIED

Mike Sheldon

DTG, Inc. Limited Purpose Landfill

P.O. Box 14203

Mill Creek, WA 98082

RE: Odors, blowing trash, daily cover, waste acceptance, ground waste, after-hours activity, and next cell approval schedule at DTG Limited Purpose Landfill (YHD permit number HSW2019-00020).

Mr. Sheldon:

As you are aware, the Yakima Health District and other agencies have been receiving complaints regarding the DTG Limited Purpose Landfill operations for some time now. The complaints are continuing and increasing in frequency. These complaints involve odors leaving the landfill, blowing trash on and off the facility property, waste acceptance, activity at the facility in the evening and into the night, and others. The Yakima Health District, Washington State Department of Ecology, Yakima County Clean Air Authority, Yakima County Code Enforcement and others have been investigating these complaints.

During these investigations, it has been determined that many of the complaints may be valid. I will discuss individual aspects of these findings below.

Odor

We have been receiving odor complaints for over a year. Because of these complaints, I have been to the facility as well as around the facility many times trying to confirm these complaints. Most often, I could not find the odors. Many of the complaints stated that the odors started in the evening or about sunset on most days. One evening, odors were detected by a Yakima Health District Inspector and a Department of Ecology inspector working together. These odors were strong and beyond what the neighbors should have to deal with.

WAC 173-350-400(4)(j)(i) Setbacks states that setbacks must be maintained to control nuisance odors, dust and litter. WAC 173-350-400(6)(a)(iv)(B) requires that the facility will be operated to…control…nuisance odors (see the full language for this section in the regulation).

Due to the strong odors having been confirmed to be leaving the facility, the odor control at this landfill does not appear to be meeting these standards. Because of this, steps need to be taken to eliminate the off-site migration of nuisance odors. Please provide a proposal to reduce odors to acceptable levels along with a schedule for implementing those steps. This proposal and schedule must be submitted within 30 days of the certified receipt of this letter.

Blowing Trash

As you are aware, blowing trash (mostly plastic), both on and off the facility has been an issue for quite some time. Site visits by Yakima Health District personnel confirmed that this is an on-going problem. We appreciate the steps you have taken to reduce windblown trash, such as being able to put a number of people on the litter clean up detail on short notice. This has not been working well as windblown trash continues to be a problem.

Steps need to be taken to prevent the windblown trash from leaving the landfill in the first place. These steps could include, but are not limited to, no longer accepting plastics at the landfill and/or a more thorough daily cover at the end of each operating day. Please provide a proposal to prevent windblown trash from leaving your facility along with a schedule for implementing those steps. This proposal and schedule must be submitted within 30 days of the certified receipt of this letter.

Waste Acceptance

Reports have been received of plastics around the landfill being food bags without the food in them (such as potato chips and other snacks). Please be aware that WAC 173-350-040 “Municipal solid waste (MSW)”, subsection (c) states “…The residual from source separated recyclables is MSW.” Stated another way, no residuals from municipal solid waste are allowed in this limited purpose landfill, even if the residuals are a material that is normally acceptable at this landfill.

In general, the waste that is being disposed of at this facility appears to be wetter than has been historically disposed of in this landfill. Occasionally, a load is observed that is visually wet, but not dripping wet. This increased moisture being placed in the landfill can increase the rate of degradation of materials in the landfill leading to increased gas and odor production. It can also increase the production of leachate, which is a concern in an arid design landfill.

Ground Waste

Loads of ground up waste have been observed being placed in this landfill. Grinding waste, even demolition debris, can increase the rate of degradation due to greater surface area being exposed. Ground waste is much more likely to behave more like municipal solid waste in the landfill. It also makes it impossible to determine if a load is made up of material acceptable for disposal in this landfill. Because of these concerns, you should not accept ground waste for disposal in this facility, beginning immediately.

Just a reminder: No residuals from other material recovery facilities should be coming to this landfill for disposal. These residuals should be disposed of in the counties of their origins.

After Hours Activities

We continue to receive reports of evening/night truck traffic in the landfill. It is my understanding that after-hours activities in the landfill are limited to equipment deliveries and maintenance activities. No loads should be disposed of after hours. I am aware that you have been dropping trailers of waste by the landfill office during the evening and then taking it to the landfill the next morning for disposal. The Yakima Health District has no issues with this activity as long as the materials being disposed of are appropriate to this landfill.

However, you should check with Yakima County Planning regarding hours of operation in the conditional use permit for this landfill. Make sure the dropping of truck trailers is in compliance with the conditional use permit conditions and modify your operations accordingly.

Next Cell

The concerns regarding increased waste disposal volume, increased odor production, moister waste going into the landfill, inappropriate/ground waste going into the landfill, et al will impact any approval to move into a new cell at this facility. Please consider this letter a formal notice that you are not approved to start placing waste in the next cell (currently the western rock pit) until written approval is granted from the Yakima Health District with the concurrence of the Washington State Department of Ecology.

There are several issues that need to be addressed to get approval to utilize the next cell. These items include:

-Confirming that the hydrogeological report reflects the change in waste type and volume entering this landfill and covers the area of the next cell.

-The need for a prescriptive liner vs. an arid design liner (WAC 173-350-400(4)(c)), especially giving the increased amount of waste and its moisture content. You will need to justify the continued designation as an arid design landfill or install the prescriptive liner in the next cell, including leak detection and leachate collection;

-The need for gas monitoring wells (no measure of gas movement through soil is available with the current system).

-The process to prevent unacceptable wastes from entering this landfill.

-A need for an additional monitoring well below the next cell (to the west of existing monitoring wells).

If you have any questions, please call me at (509) 249-6562.

Sincerely,

Ted Silvestri, R.S.

Environmental Health Specialist

cc: Washington Department of Ecology

Yakima County Commissioners

Yakima County Planning

Yakima County Clean Air Authority

Yakima County Code Enforcement

Brooks Franklin