



March 31, 2022

John Martin  
Associate General Counsel  
DGT Recycle  
P.O. Box 14203  
Mill Creek, WA, 98012  
(425)-549-3000

Re: New Source Review (NSR) application determination for DGT Recycle, for the Limited Purpose Landfill (LPL), located at 41 Rocky Top Road Yakima, Washington 98902.

Dear Mr. Martin:

This is the official reply from our office for your inquiry, as promised within a couple of weeks regarding your NSR application for the Limited Purpose Landfill (LPL) located at the 41 Rocky Top Road. As you know, we have been working with you and your consultant. As a result of this work your consultant has submitted the last NSR application on January 5, 2022 to include a Material Recovery Facility (MRF). However, in light of the most recent development at your facility, and the new information from the report, "Soil Gas and Ambient Air Sampling Report dated February 25, 2022" received from the Department of Ecology on March 1, 2022, our office will not be able to issue the permit until the following are submitted and satisfied. Hence, as YRCAA continues to work on the draft Order of Approval (Permit) for your facility the following must be submitted to our office on or before June 1, 2022:

1. As the pollutants are toxic in nature, according to the report and we do not know exactly the cause and how much are beneath the active cell including the migration pathway, and even the cause of cracks/fissure; further sampling should be done to quantify the air emissions properly and figure out a control emission method. YRCAA suggest the following approved EPA method to be used to identify and quantify the VOC emissions at the active cell:
  - Having several gas sampling probes on the active cell itself and take gas samples from those sampling ports, which will quantify the gas and the kind below the cell. We suggest at least two samples per hectare as referenced by EPA 40 CFR Part 60, which requires the probe to be at least three feet within the landfill waste. We will be glad to work with you in determining EPA approved method for the sampling analysis. Once the gases are identified, and the quantified, a control methodology can be implemented. If the gas quantity warrants a control methodology, your facility needs to propose one, which will be included in the final order of approval. Of course, YRCAA will help and work with DTG to accomplish that and to meets the air quality standards.
2. YRCAA received a copy of an approval from the Department of Health for a new cell at your facility. We assume it is cell 2. A NSR application shall be submitted for the modification/expansion to the LPL that expands the area to include 64 additional acres to the



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south of the existing LPL. This should include a site map of the proposed new cells, roadways, and any other information pertinent to the emissions produced by this expansion including the new design capacity.

3. Please provide an updated list of equipment used in the DTG operations and include whether they have been accounted for in the fugitive dust emission calculations. During the silt-sampling event, two of the large dump trucks, were observed in moving soil to the LPL for top cover. However, upon further review of the application only one was listed in the equipment list. Please just clarify the/update the list.

I hope this letter helps you understand the complexity of the permitting involving your facility as we have been working with you and your consultant. We do really appreciate your cooperation and understanding in finalizing your Permit. If you have any questions regarding this letter, feel free to email or contact me at (509) 834-2050 Ext. 105. Thank you.

Sincerely,

Hasan M. Tahat, Ph.D.  
Compliance, Engineering and Planning Division Supervisor  
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