

From: [Rivard, James \(ECY\)](#)
To: [Ted Silvestri](#)
Cc: [Brandon Comfort](#); [Shawn Magee](#); [Steven Newchurch](#); [Grieves, Kimberly](#); [Lemond, Luke \(ECY\)](#); [Rounds, Megan \(ECY\)](#)
Subject: RE: DTG
Date: Friday, January 14, 2022 5:04:45 PM

With the gaseous emissions if it showed something bad – digging into the landfill might be needed (likely would have to be really bad and last resort). The initial proposal by the company to push and close quickly is more of the bury and forget route. We can't do that we work for the public's interest. What might show up, I have no idea, but a limited purpose landfill producing emissions, settling, and cracking the cap is unusual... Construction and demolition debris landfill should not have a lot of biological activity. Why the odor is another good question? Even more so to why YHD and Ecology should be asking questions before the facility pushes to close that cell. The public expects us to look out to ensure compliance. Is a gas extraction system needed? If so why not install that while closing to avoid grade and filling of dirt twice? In the long-run more dirt will help with odors. However, throwing dirt on now in a large way and not determining the landfill gas production question (now) could lead to a compounding issue down the road, which wouldn't be in the best interest of the public or environment. Piling dirt on now, may push landfill gas down in the soil profile, only to re-emerge back up off site or into the groundwater, which becomes a bigger problem.

The environmental assessment and remedy needs to be done right. Closure plans of the past are just that... a plan. A plan can change. A plan is not set in stone is what I am saying here. Environmental permits are not set in stone either, they flex and change and considerations are made. So if changes are needed... then they are needed and if they are to be protective human health and the environment then a change maybe warranted. Companies don't like to hear that and often say "well it was approved" but approval in our line of business is never without the possibility of additional requirements and changes may apply later.

I can't really speak to Ecology approving the shorter setback, but it is good they are maintaining the setback in the regulation.

Luke/Megan/Kimberly will be getting back to you about wells and slopes advise/technical assistance. What I'm picking up on is, their current analysis may not agree with past analysis and permit conditions but that is the way things go sometimes with managing environmental permits. These permits are living governing documents that can change. Although this might create some work for YHD and further consideration staff are doing this to best advise YHD for the protection of public health and the environment.

Generality perspective here below regarding solid waste management. It is always something to keep in mind.

A public landfill has the financial incentive to not fill the hole and to preserve the lifespan of the facility as it saves money for the public. A private landfill has a financial incentive to fill the hole. A public landfill has the incentive to not pollute the environment, because they as a public facility cannot pass on the liability to someone else. When a private facility becomes insolvent, the county (as a public entity) takes on the legal liability, financial burden, and any headache with dealing with pollution.

This is why the regulatory authority's role in solid waste is important to ensure requirements are met to ensure the operator does the right thing – not the easiest, simplest, or quickest thing – and the right thing is the best one that is most protective of the environment, public health, and is less likely

to impose a future financial burden to the public.

From: Ted Silvestri <ted.silvestri@co.yakima.wa.us>

Sent: Friday, January 14, 2022 2:55 PM

To: Rivard, James (ECY) <JRIV461@ECY.WA.GOV>

Cc: Brandon Comfort <brandon.comfort@co.yakima.wa.us>; Shawn Magee <shawn.magee@co.yakima.wa.us>; Steven Newchurch <steven.newchurch@co.yakima.wa.us>; Grieves, Kimberly <ksar461@ECY.WA.GOV>; Lemond, Luke (ECY) <llem461@ECY.WA.GOV>; Rounds, Megan (ECY) <MROU461@ECY.WA.GOV>

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James,

Test Results/odors

I have not seen the test results yet. When I asked DTG yesterday, I was told there were covid delays. I agree, it would be helpful to have those test results. Regardless, capping the lower portion of the landfill to prevent odors appears to be an acceptable method and my intention is to approve it, unless there is some specific legal reason not to. The closure plan has already been approved by Yakima Health and by Ecology. Also, steps need to be taken to mitigate the odor that is currently an issue at this facility. What would show up in the test results that would change this?

Well Setback

A shorter setback had already been approved by Ecology when the permit was processed. However, DTG has already agreed to stay back from all neighboring wells at least 1,000 feet. The main well with setback concern is Carol DeGrave's well.

Monitoring Well

I agree that another monitoring well is needed. DTG has already agreed to the installation of an additional monitoring well. DTG is also ready to submit the design and location for this well. They just need us to tell them what to submit to get the monitoring well site approved. This will make it 3 downgradient monitoring wells. If more than one additional monitoring well is needed, I will need a good justification before I will require it.

Ted

Ted Silvestri, R.S.

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From: Rivard, James (ECY) <JRIV461@ECY.WA.GOV>

Sent: Friday, January 14, 2022 2:25 PM

To: Ted Silvestri <ted.silvestri@co.yakima.wa.us>

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Hi Ted,

Any results back on the gas emissions that were noted on the northside coming out of landfill cracks on the landfill cap? Last I heard is the facility had a consultant taking samples on or around December 6th 2021. That has been a while, laboratory results should have been provided by DTG and the consulting firm by now. I wouldn't recommend covering/closing like the facility proposed until we know the results of exactly what was being emitted. Depending on those results it could indicate other actions are needed before closing.

I hear you about the 2 month timeframe to being full... But, lack of planning on their part is not an emergency on YHD's part to ensure compliance with regulatory requirements to protect the environment and public health.

The facility should plan to stay 1000 feet from any well for a landfill. Ecology may never agree to a variance, proposing otherwise might be a waste of time/effort/money.

Kimberly, Megan, and Luke are working to review information to advise YHD. But they may bring to light some big questions and concerns that will need YHD's attention to ensure compliance to be protective of human health and the environment. One of these might be that DTG may need more monitoring well(s), more than 1 additional, multiple are possible.

From: Lemond, Luke (ECY) <llem461@ECY.WA.GOV>

Sent: Friday, January 14, 2022 1:45 PM

To: Rivard, James (ECY) <JRIV461@ECY.WA.GOV>

Subject: FW: DTG

FYI

Luke LeMond, LG

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From: Ted Silvestri <ted.silvestri@co.yakima.wa.us>

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Kimberly/Luke/Megan,

These are the steps and concerns I think we should address as we move forward with DTG. I would appreciate your input and approval. A short turn around time is needed because the facility is going to run out of space within 2 months.

Below are the Yakima Health District's intended actions on the issues we have brought up in our letter:

Odor

Odor is proposed to be mitigated by closing (capping/final cover) the lower portion of the landfill, including the cracks where the odor is emanating from. This is acceptable to the Yakima Health District. Alternative 1 is the approved method of closure in the approved application from 2015. DTG states they can have it done in under two weeks (at least the lower portion of the landfill). YHD agrees with this step and is going to approve this. This capping needs to commence ASAP so we can mitigate the odors at this facility. What, if anything, is needed prior to this approval?

Blowing Trash

DTG has invested in wind fences which have been deployed. This is an acceptable first step and they should be given time to see how it works. YHD is okay with this. If windblown continues to be a problem, we can implement more stringent controls such as a more thorough daily cover. Once waste starts going into the next cell, it will be placed below grade for years which should further reduce the windblown problems at that time.

Waste Acceptance

The items of concern have been fixed (no more ground waste). No further action needed at this time.

After Hours Activity

After hours activities at the landfill have stopped. Some Rock crushing activities do occur, but these are not under the Yakima Health District's authority. No further action needed at this time.

Next Cell

The use of this cell is already approved. DTG has voluntarily agreed to stay back 1,000 feet from all wells at this time. (Filling the current excavation will achieve this.) No valid reason has been given to

not allow waste to go into this cell. Does the monitoring well need to be installed first? (I think so.)

Additional Monitoring Well

They state that the additional monitoring well need is likely based on excessively wet material being disposed of at this facility. YHD does not agree with this conclusion. It is based on the monitoring for potential contamination in the ground water. This new area to the west is not covered by the current groundwater monitoring system. A new well to the west is needed. I think DTG needs to submit a proposed monitoring well location with justification so we can review and approve this well location. What do we need to approve a monitoring well location?

DTG has engineers and hydrogeologist that are ready work on all of this. Because of the short time frame (less than 2 months) before space runs out, we need a quick turn around time on this. Yakima Health is going to move forward with this. The only thing I need Ecology's concurrence on is the location of the new monitoring well.

Contact me if you have any questions.

Ted

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