



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

April 25, 2023

Ian Sutton
DTG Recycle
PO Box 14203
Mill Creek, WA 98082

Re: Extinguishing Subsurface Fire at the Anderson Landfill

- **Site Name:** Anderson Landfill
- **Site Address:** 41 Rocky Top Rd, Yakima
- **Facility/Site ID:** 79747294
- **Cleanup Site ID:** 11537
- **Agreed Order No.:** DE 21624

Dear Ian Sutton:

On March 27, 2023, DTG contractors recorded temperature of 425°F in the landfill at 5 – 10 feet below the surface. Smoke was observed emanating from at least one borehole. Gas monitoring from this probe and other probes installed in the same area have since recorded elevated temperature (greater than 400°F) on multiple dates as well as carbon monoxide above 499 parts per million (ppm). The data and observations indicate a subsurface fire is active in the area of the landfill where investigation is required in the Agreed Order (AO). In a letter dated April 10, 2023, the Yakima Health District (YHD) required DTG to submit a fire response work plan by May 11, 2023.

At this time, Ecology believes extinguishment of the subsurface fire qualifies under Section 7. Work to be Performed, Subsection 7.7 of the AO as “necessary to abate an emergency situation” as well as being “required by law” because Yakima Health District (YHD) is directing it under its authority as the permitting agency for the landfill.

Please note that despite this independent emergency action being conducted outside the requirements of the AO, because it will directly affect remedial activities to be conducted under the AO, it is Ecology’s interpretation that the Access to Information provisions apply to this activity (Section 8. Terms and Conditions, Subsection 8.3, Performance and Subsection 8.7, Access to Information). If fire suppression actions proposed or undertaken by the PLP evolve into what Ecology determines are significant remedial actions that should be addressed under

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the AO (such as excavation of hazardous substance source material) or if fire suppression actions are ineffective and causing unacceptable delays in progress toward the goals of the AO, Ecology reserves the right to direct the PLP to conduct such activities as an Interim Action in accordance with Section 6. Ecology Determinations, Subsection 6.4 and Section 7. Work to be Performed, Subsection 7.5 of the AO.

PLP Response

The PLP is requested to provide written acknowledgement of this letter. Upon receipt of the PLP's fire response work plan as required by YHD, Ecology will begin drafting an amendment to the AO to cover the fire response and its effects on the schedule in the AO.

Closing and Contact Information

We appreciate your commitment to cleanup at this Site and look forward to your response to this letter. If you have any questions, please contact me by phone at 509-379-3961 or by email at luke.lemond@ecy.wa.gov.

Sincerely,



Luke LeMond
Hydrogeologist
Solid Waste Management Program
Central Regional Office

cc: Shawn Magee, YHD