

January 16, 2026

Luke LeMond
Site Manager
Solid Waste Program
State of Washington Dept. of Ecology
Central Regional Office
1250 West Alder St.
Union Gap, WA 98903-0009

Re: DTG Yakima – Agreed Order No. DE 21624 – Monthly Progress Letter – December

Dear Mr. LeMond:

In accordance with Section 7.3 of Agreed Order (AO) No. DE 21624, the following is a description of the actions taken during December 2025 to implement the requirements of this AO.

Activities:

On-site activities included weekly gas probe and every other week ambient monitoring. A regulatory review meeting was not held in December. The monitoring data summary through December 2025 from Landfill Fire Control, Inc. (LFCI) is attached.

The week of December 1, 2025, Parametrix performed the Q4b groundwater sampling.

On December 2, 2025, DTG had a call with Ecology to discuss the Interim Action Work Plan.

On December 3, 2025, Freestone performed the Q4 LFG monitoring.

On December 9, 2025, DTG provided the Q3 groundwater report and the Q3 MTCA Technical Memorandum (TM).

On December 10, 2025, DTG provided the Q4 methane monitoring report.

On December 18, 2025, DTG provided the MW-1S and MW-11S installation TM.

On December 29, 2025, DTG submitted the 202 LFG annual methane monitoring report.

The week of December 29, 2025, the MTCA soil cover was re-addressed around T-4.

Deviations from Plans (if any):

None.

Deviations Description from the Scope of Work and Schedule:

None.



Address

22745 29th Dr. SE, Ste 200,
Bothell, WA 98021

Contact

425 549 3000
dtgrecycle.com

All Data Received or Collected:

Ambient and gas probe data for gases and temperature were emailed, separately, to Ecology weekly after measurements were taken. Gas probe data was entered into the tracking spreadsheets and assessed by LFCI. The summary of the data has been included as an attachment.

Deliverables for the Upcoming Month:

Deliverables will include:

- Weekly ambient and gas probe data
- January Progress Report
- Thermistor Installation TM
- Draft Interim Action Work Plan

Please contact me to discuss any of the above items.

Respectfully,



Ian Sutton
Sr. Director of Engineering
DTG Recycling
isutton@dtgrecycle.com

Enclosures: LFCI Data Update – December 2025

cc: mbrady@parametrix.com
steven.newchurch@co.yakima.wa.us



Providing a full range of landfill fire control and prevention services.

- Fire Safety Training
- Fire Safety Audits
- Fire Prevention and Response Plans
- Fire Extinguishment Strategies
- Fire Extinguishment Services
- Fire Monitoring
- Environmental Monitoring
- Forensic Investigations

January 15th, 2026

LFCIPRJ-2023-001

Mr. Ian Sutton, Director of Engineering
DTG Recycle
P.O. Box 14302 Mill Creek, WA 98082

By email: isutton@dtgrecycle.com

Re: Monthly Data Assessment Report DTG Yakima Landfill Fire Incident – December 2025

Dear Mr. Sutton,

LFCI has prepared a monthly review and update of gas and temperature monitoring data that is being collected at the DTG Recycle Landfill Fire in Yakima, Washington. The update includes maps showing the spatial distribution of temperature, carbon monoxide, and oxygen within the monitoring area and presents the data collected, highlighting trends and interpreting the results.

Following the continued slow signs of suppression observed in the past several months and a levelling trend observed in 2025, the month of December has exhibited this continued response even with the new thermistors that have been installed. Overall, CO and temperatures have been relatively stable or decreasing over the past month. Temperature in T-1 and GP-3 has continued the decreasing trend, but the newly installed T-4 has continued to indicate increased temperatures.

The elevated temperatures in T-4 are isolated from the other elevated areas although the temperatures are very similar. LFCI believes that this may have been a secondary hotspot when the fire was first detected, but the temperatures are following the same trends as GP-3 and T-1. Through close monitoring, the extended high CO and temperatures lead LFCI recommended additional cover in that area to address the slopes that were cut into to install T-4. Since the soil was placed, CO and temperature have started to decline during the last two readings.

When continuing to look at long term trends, the collected data has indicated that the subsurface smolder has become much less active since the soil cover was applied. A concern has been recognized with oxygen levels increasing throughout the past few months to highest levels observed to date in many wells (see spatial maps of O2).

Further to this, LFCI has noted a seasonal trend in oxygen levels, with elevated oxygen levels occurring in summer months and lower oxygen levels in winter months. It was previously speculated that these trends were correlated with atmospheric pressure swings; however, as the highest oxygen levels are being observed in the summer months when average atmospheric pressures are low, and short term pressure swings are less intense, it is now believed that the reduced oxygen levels are more likely the result of frozen ground conditions and snow cover which inhibits air entry into the landfill in the winter months. This means that

LANDFILL FIRE CONTROL INC.

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www.landfillfire.com



LFCI expects the winter months ahead to show decreased oxygen levels within the waste mass, which may be accompanied by further decreased temperature and CO levels. This has been indicated in December, with more wells showing levels lower than ambient air.

Plotting the temperature data in plan view clearly shows that the area affected by fire has markedly decreased over time. As stated in previous monthly updates, LFCI believes that the data shows a small smolder continues to be active near GP-3, and that the rate of combustion of the smolder is steadily decreasing, however slowly. Based on the extinguishment target of temperature dropping below 180°F, we continue to project that the fire will be declared extinguished within the year (summer 2026). However; if the temperature response continues to level off around 300 F, additional intervention may become necessary.

Furthermore; the area around T-4 will require continued close assessment and LFCI believes that further suppression measures may be necessary to reduce the risk of continued oxygen intrusion into this area.

Pressure readings have reported a very large high pressure spike in excess of 1 bar during the last reading on January 7th. Depending on the condition of the ground, this spike may have triggered an incursion of oxygen into the subsurface which may result in increased thermal activity in the next couple of weeks.

Based on this, LFCI recommends that monitoring continue on a weekly basis until it can be shown that CO levels in all locations have decreased to below 500ppm, once corrected for cross sensitivity effects. At that time, monitoring can be decreased for prevention purposes. Given the recent response and the reduced timeline now projected to extinguishment, LFCI is of the opinion that further intervention is not warranted at this time.

We trust that this report provides the information you require, and should you need anything else please don't hesitate to contact the undersigned.

Sincerely,

LANDFILL FIRE CONTROL INC.

Dr. Tony Sperling, P.Eng.
President



January 15th, 2026

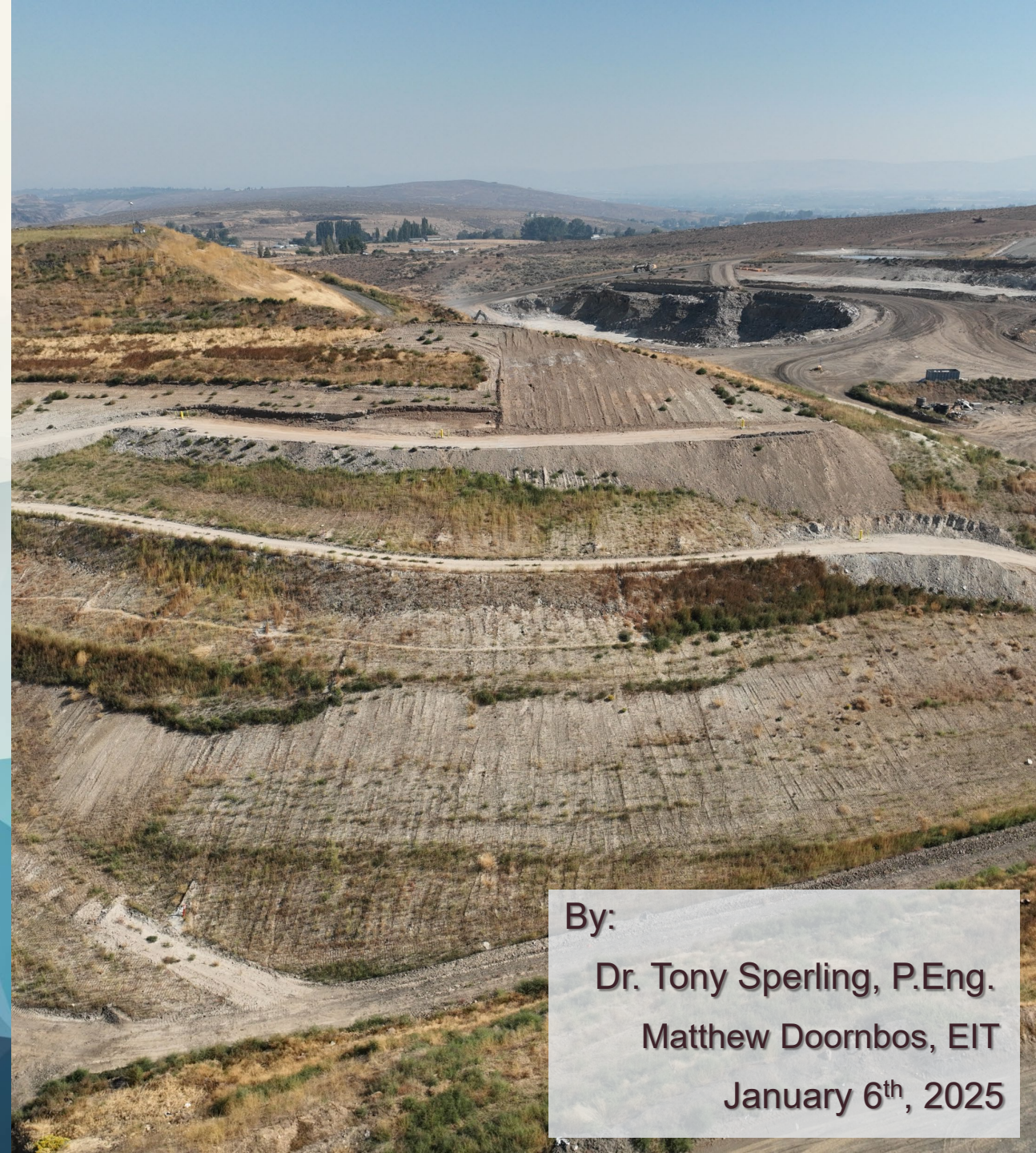
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DTG LPL LANDFILL FIRE INVESTIGATIONS AND MITIGATION

Monthly Monitoring Data Review
December 2025



By:
Dr. Tony Sperling, P.Eng.
Matthew Doornbos, EIT
January 6th, 2025

Introduction

BHP Locations

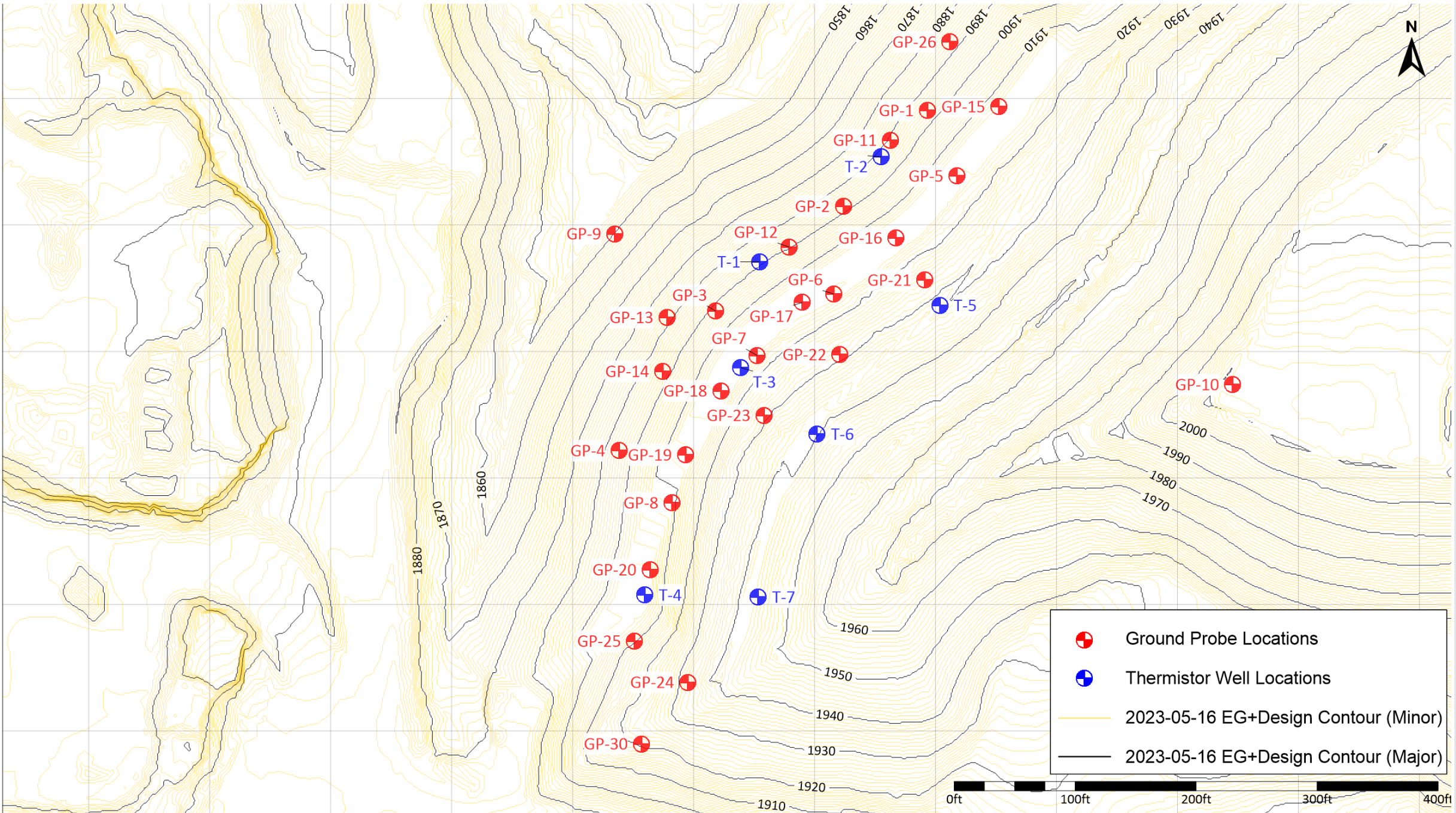
- There have been 31 Ground Probes installed, 3 of which are no longer monitored. 26 probes are monitored weekly, and 2 are monitored on a bi-weekly basis.
- Three thermistor wells were installed in mid-2023, which are monitored at varying depths to better determine the location of the hotspot.
- Four more thermistor wells were installed in mid-2025 to better determine the extent of the area with elevated temperatures as the fire comes closer to extinguishment.

Monitoring Data Review

- The monitoring locations are measured for levels of gas that would indicate a fire or increased thermal activity, including Carbon Monoxide, Oxygen, VOCs, Hydrogen, Hydrogen Sulfide, and Methane.
- In addition to gas levels, the temperature in each well is recorded.

Overall Interpretation

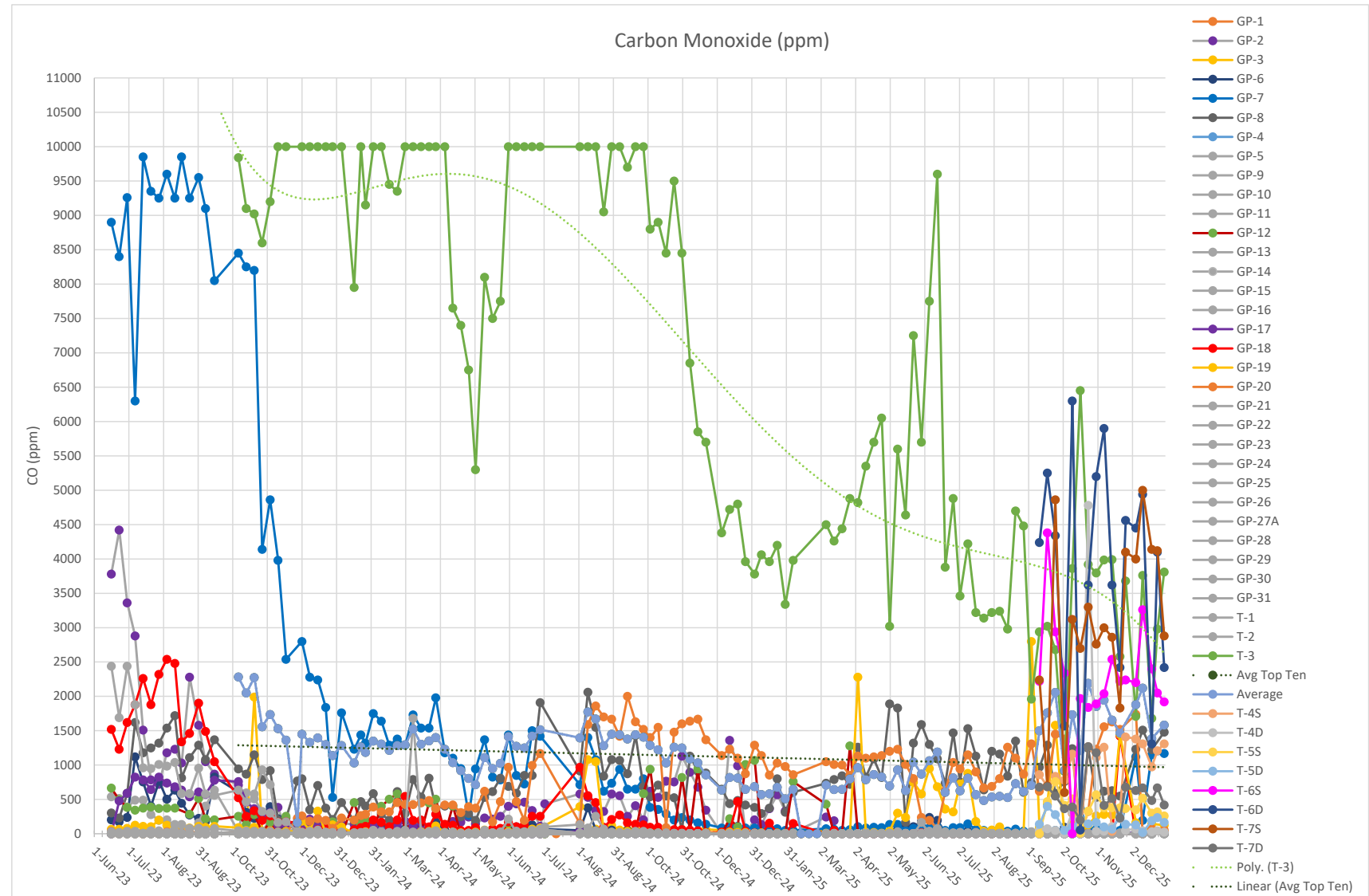




Carbon Monoxide

The month of December saw varied CO levels in monitored wells, but with T-3 maintaining levels between 1700 and 3800ppm.

The average CO across the top 10 wells has been decreasing steadily since soil application commenced.

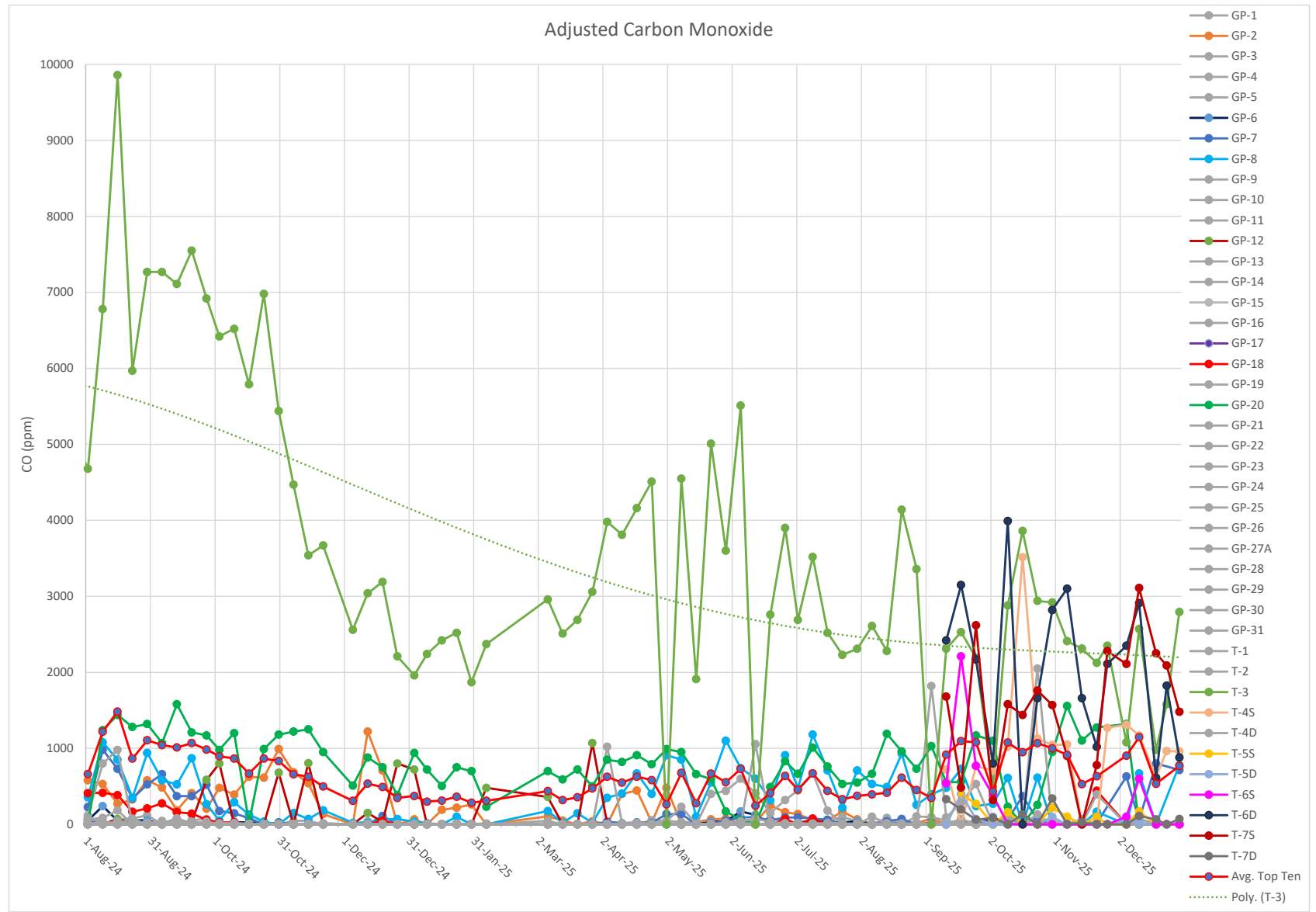


CO Adjusted for H2 Gas

Adjusted CO measurements have also shown somewhat increased but varying levels of carbon monoxide between January 2025 and early June 2025, followed by a decrease in June through August 2025.

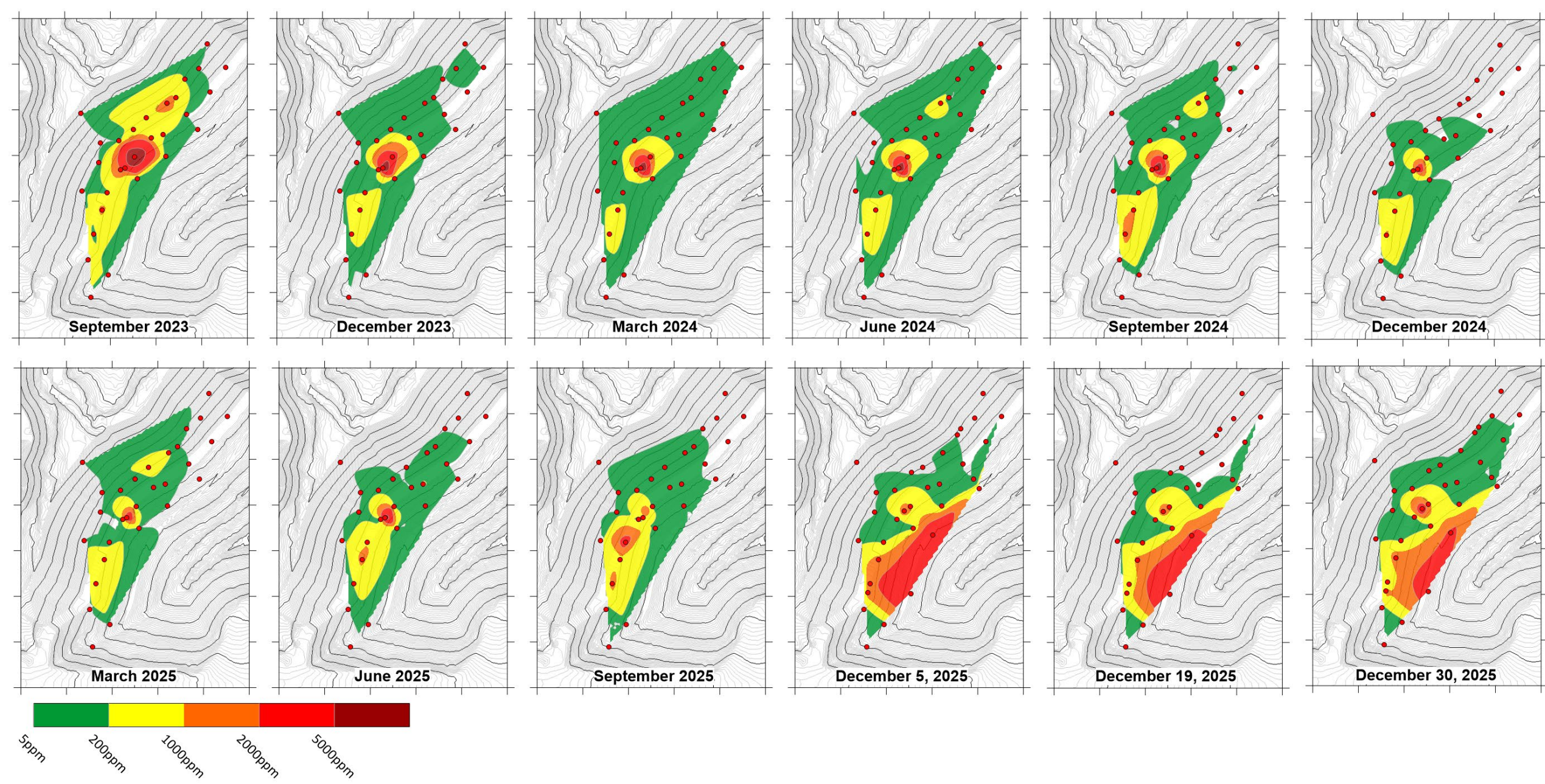
The newest thermistor wells are reading generally higher levels in the deeper readings compared to the shallower readings. LFCI has continued to closely monitor these new thermistors and has not realized any concerning trends.

The most recent CO heat map shows CO is generally steady across the site, with elevated CO levels in the new wells. December has seen decreasing levels of CO in these higher elevation areas.



CO Levels by Individual Wells



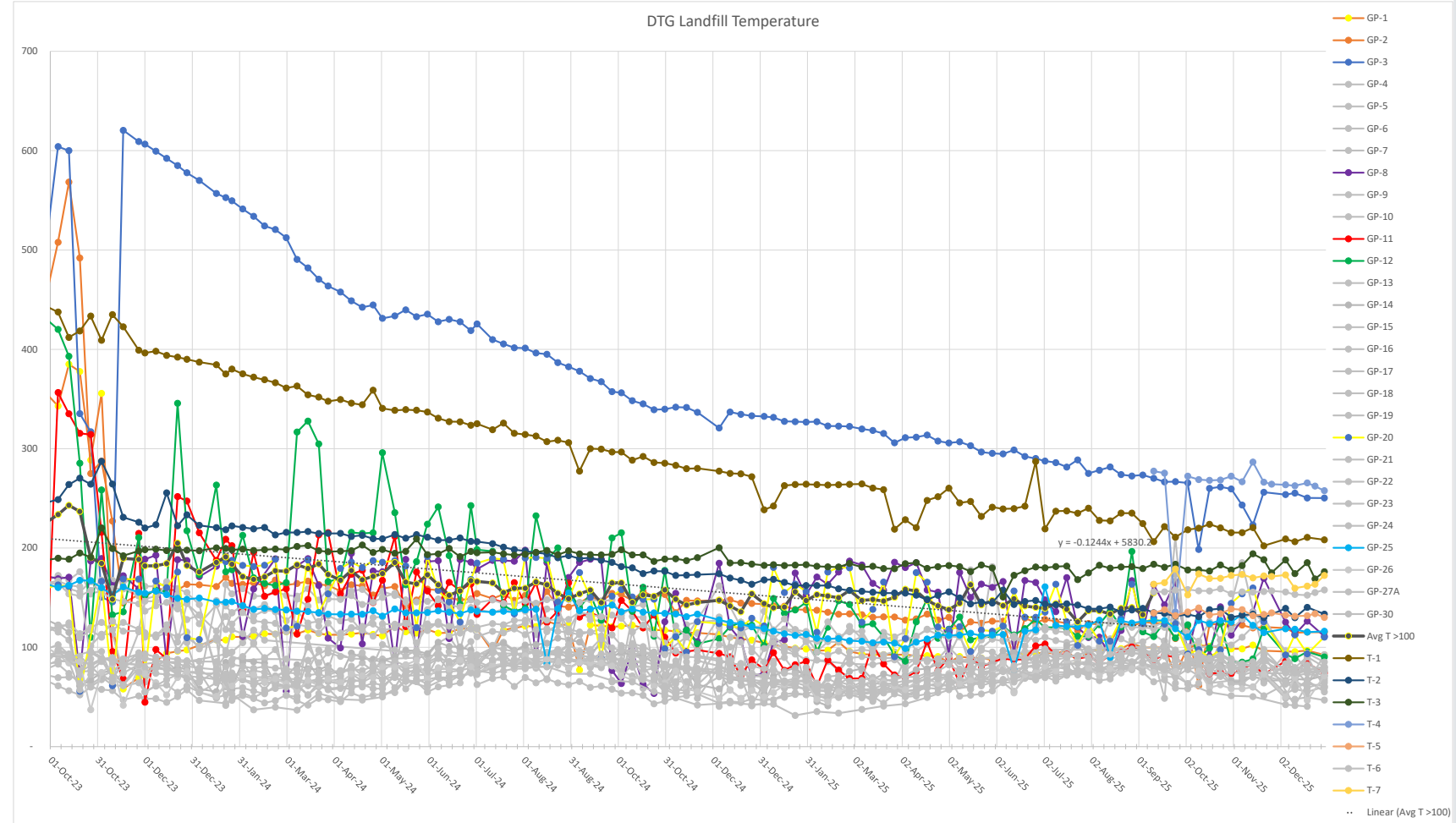


- Data taken from first monitoring event of each month unless noted otherwise
- Data has been interpolated between data points
- Datapoints (probe locations) represented in red
- CO levels are measured in ppm
- Ground contours are of existing ground at beginning of project, with design contours added for after addition of fill

Temperature (F)

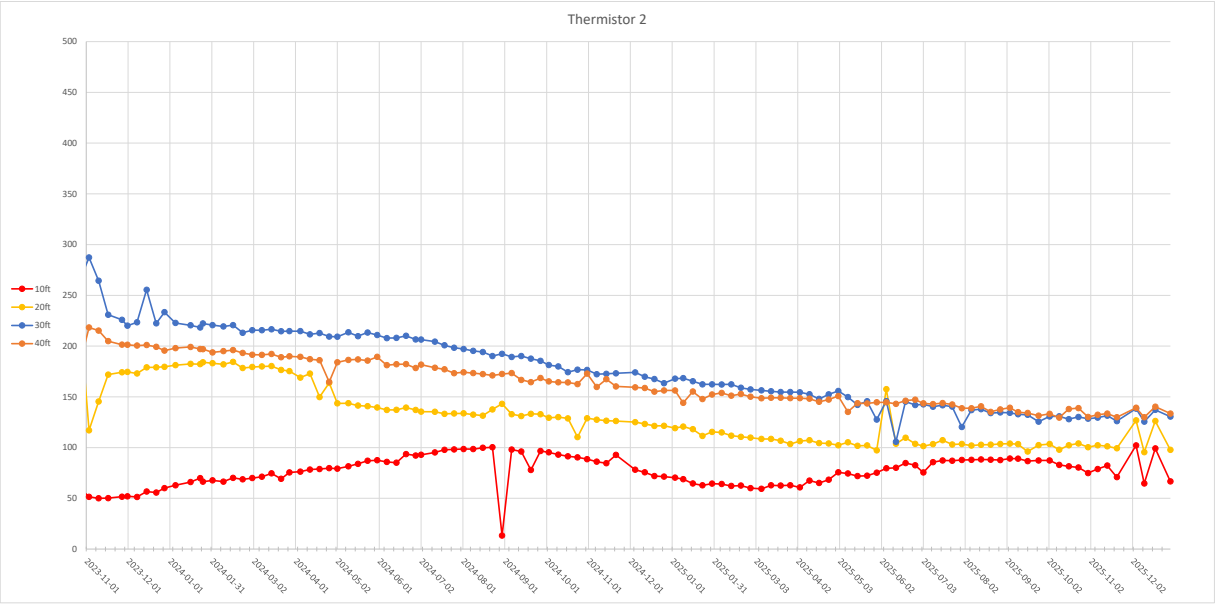
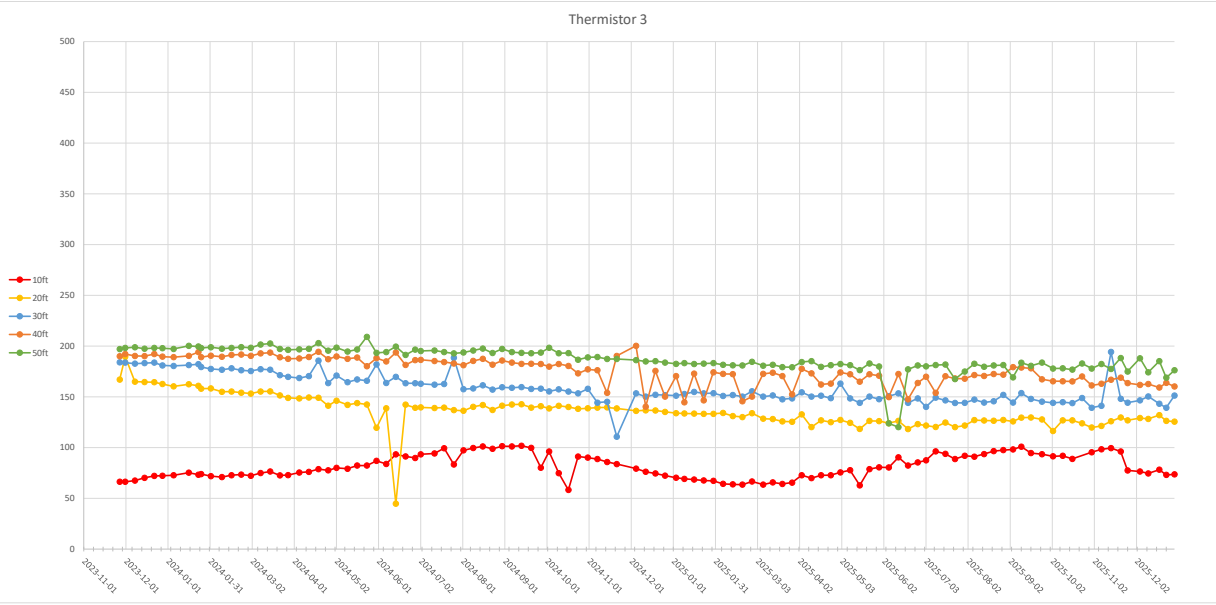
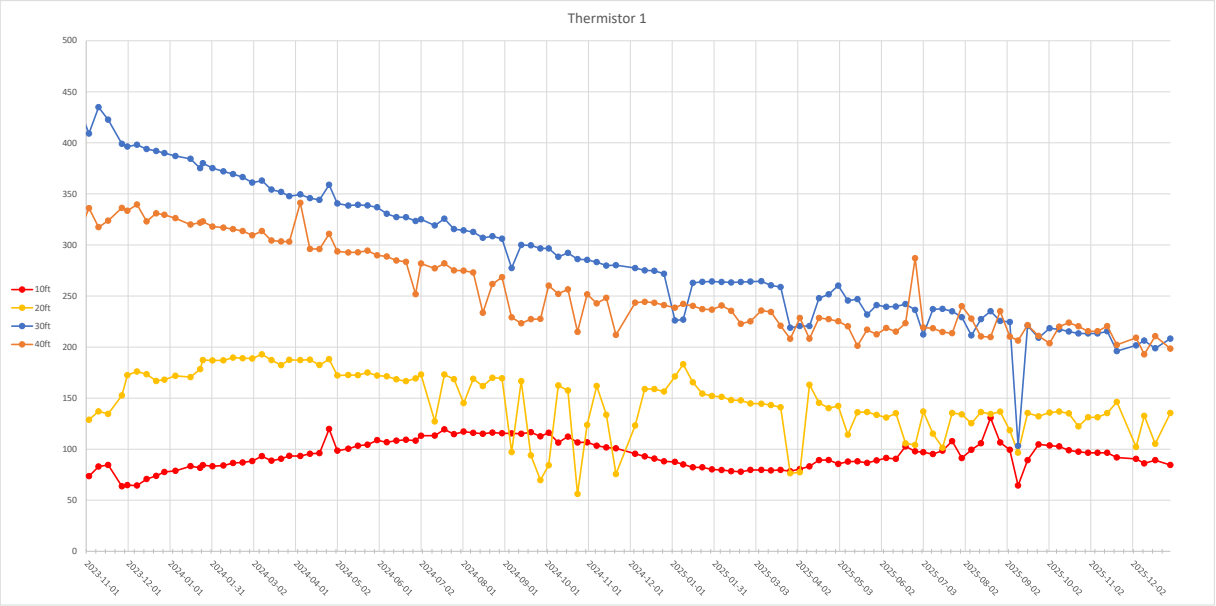
December saw continued decreasing temperatures in the hotter wells, with the low wells (gray) showing the winter temperature decrease. Similar to previous months, the trend line continues to show gradual cooling, with the wells reading above 100F showing some variation but seeming to be generally stable over the past month.

LFCI continues to see overall decreasing trends in the three hottest locations (GP-3, T-4, and T-1).



Thermistor Temperatures (T1-T3)

Thermistor temperatures are generally trending downward, but the rate of cooling appears to be slowing in T-1, which is the hottest well. There is a slight warming in T-3 at depth, which is believed to be on account of radiant heat effects. Shallow locations in all three thermistor wells continue to show seasonal warming and cooling trends.

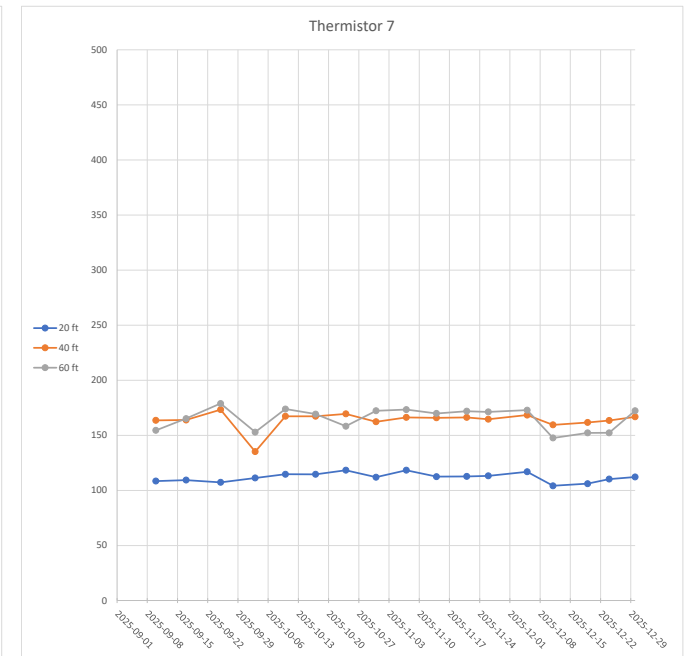
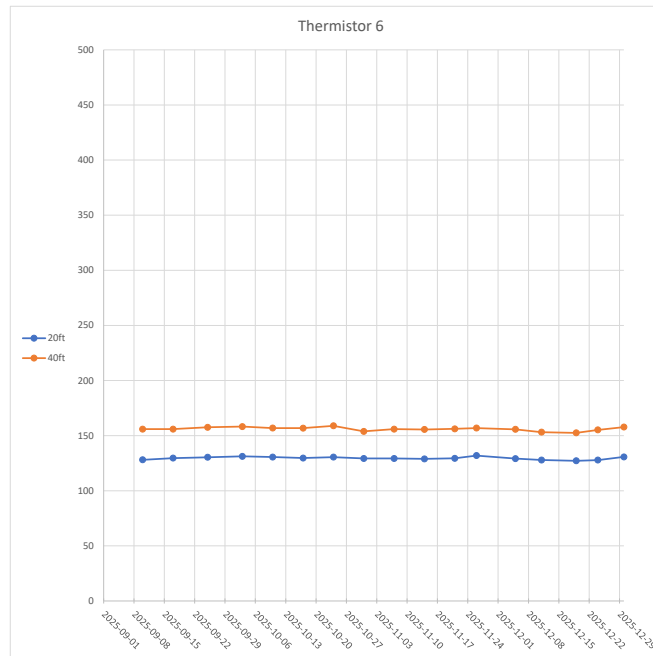
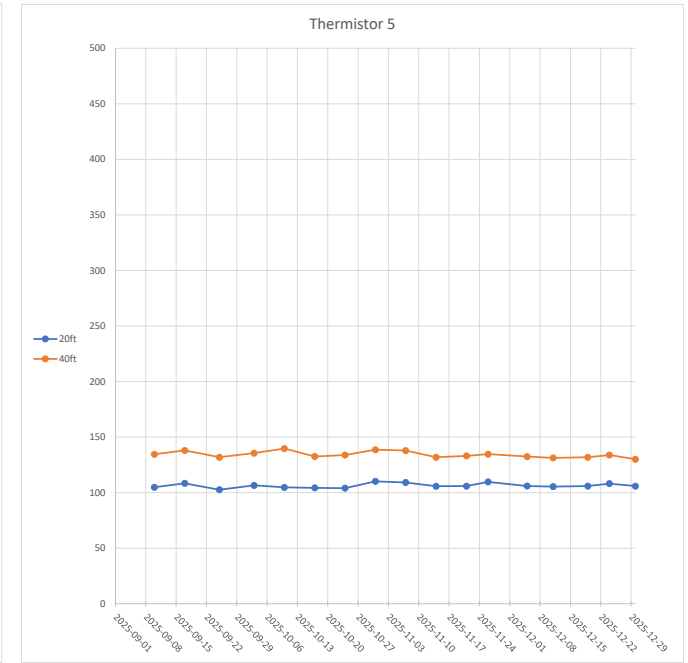
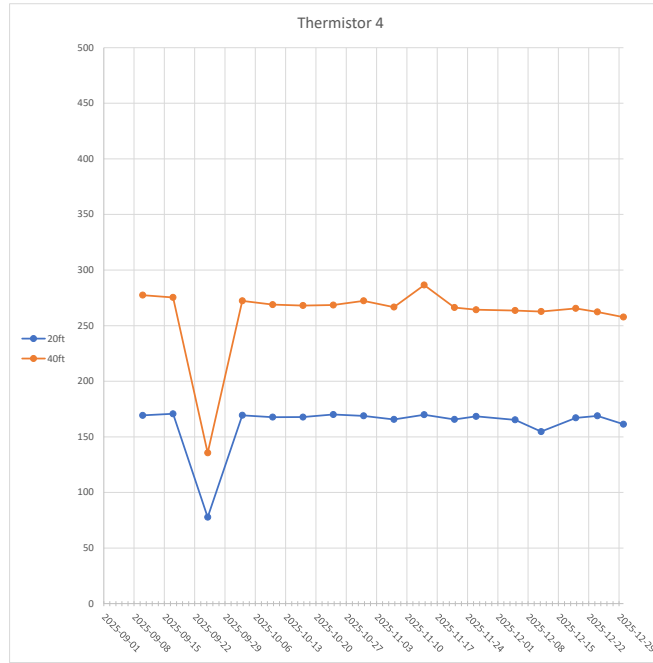


Thermistor Temperatures (T4-T7)

After four months of data, the new thermistor temperatures seem generally stable with a slightly declining trend in T-4 similar to the other temperature wells. As time progresses and more data is available, LFCI will be able to identify any trends in the data, and make more definitive conclusions on the state of the hotspot within the landfill.

The observed temperatures in the wells of 100 to 150F are normal temperatures of aerobically active landfills and at the low end of temperatures seen across the site. However, T-4 is exhibiting elevated temperatures similar to that seen at the hotspot in GP-3. 275F is 135C, which is an abnormally high temperature indicative of nearby smoldering activity. T-4 is located in an area where a significant road cut was undertaken which LFCI believed may have compromised the thickness of the soil cover in that area where historic venting of hot gases was previously noted. A review of the soil cover conditions by on site staff revealed that no waste was encountered during the thermistor installation efforts, but the remaining thickness of the cover was not confirmed. However, the surface of the area was inspected with an infra-red camera in November and the surface was found to be consistently around 40F with no elevated temperatures detected.

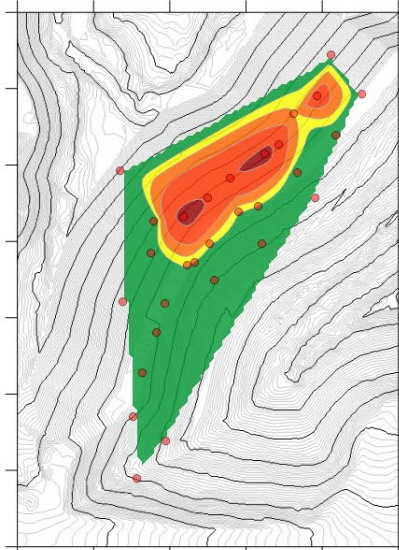
With the elevated CO readings in drilled in the area, the data suggested that the smolder which was at the edge of the soil application zone was becoming more active. Last two monitoring reading have indicated a cooling trend, suggesting that the hotspot is stabilizing and again becoming less active as soil cover was placed in the area.



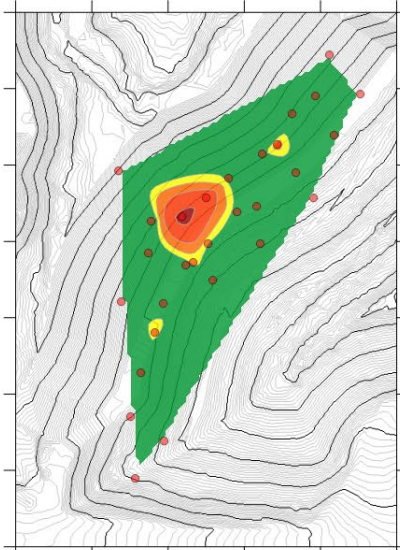
Heat Map Interpretation

The heat map shows that the main fire zone has been cooling well over time and that the smolder is being effectively contained. However, a new hot zone has been identified in the southern portion of the site around T-4 and GP-20. During LFCI's initial site inspection active smoke and elevated temperatures were noted in that area. The area was covered with soil as part of the initial fire response. LFCI was concerned that the road cuts recently undertaken had opened up an air intrusion pathway which has increased oxygen availability and re-initiated the smolder in that area.

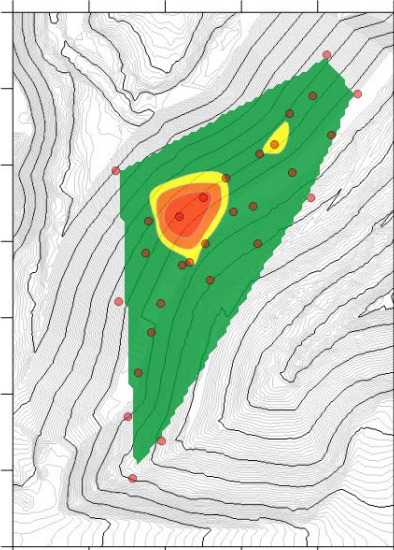
In consultation with DTG staff, LFCI recommended that additional fill be placed against the exposed slopes created during thermistor installation. This recommendation was implemented and temperatures have started dropping in the last two weeks.



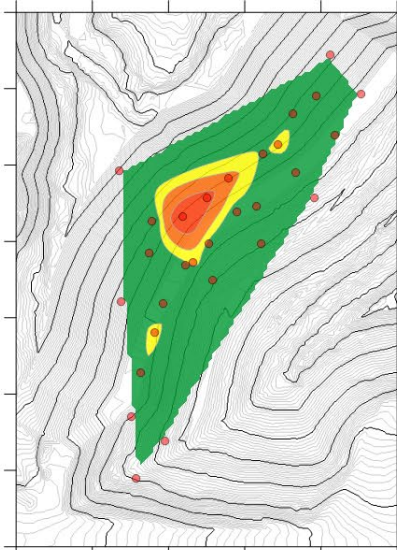
September 2023



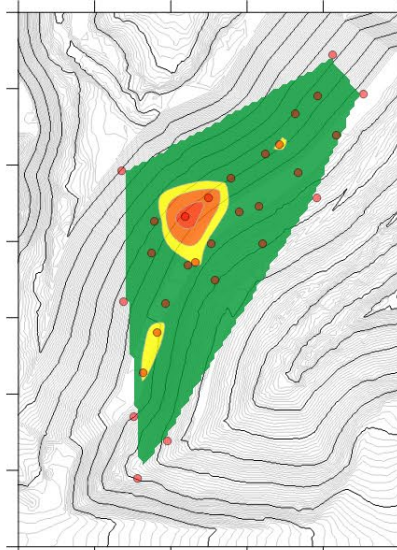
December 2023



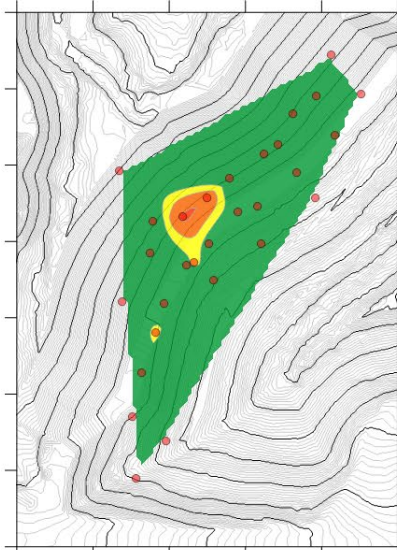
March 2024



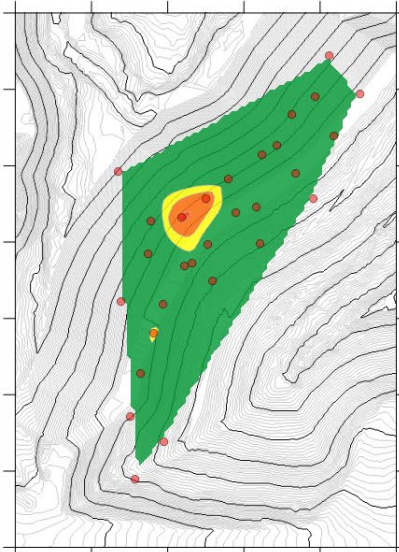
June 2024



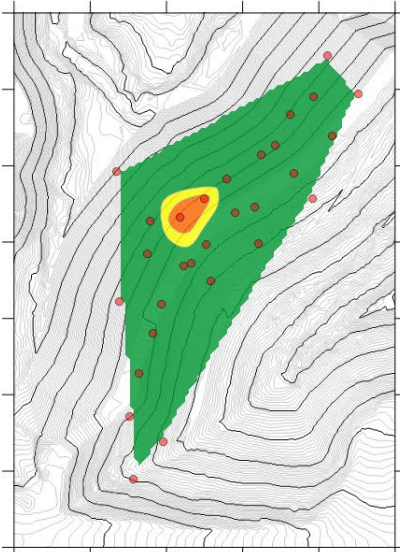
September 2024



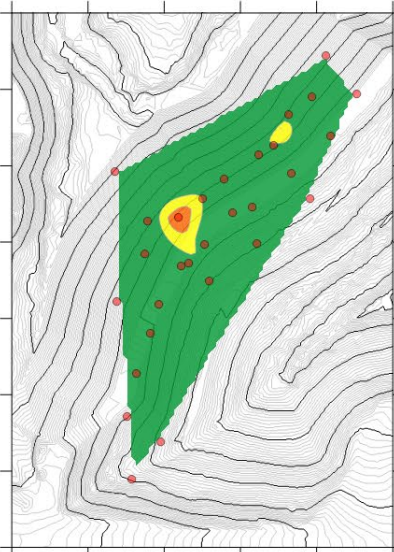
December 2024



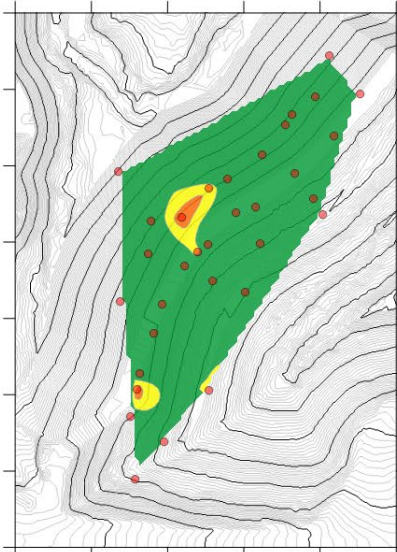
March 2025



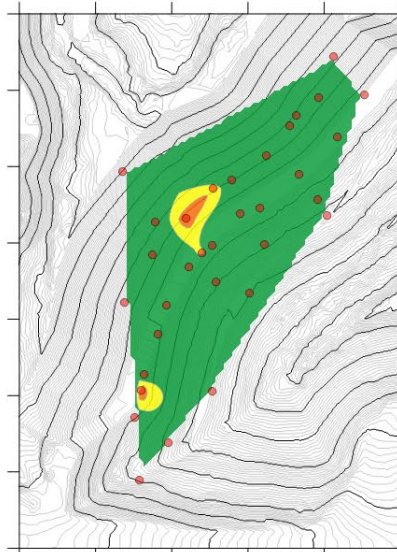
June 2025



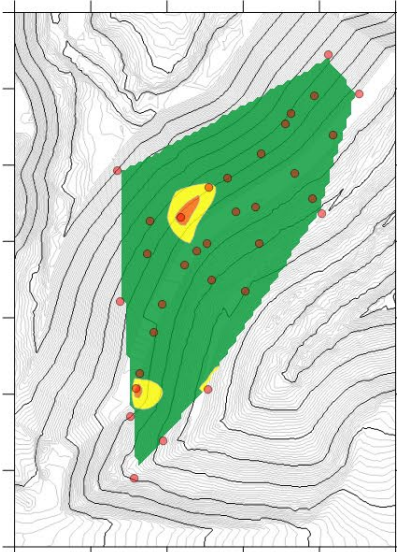
September 2025



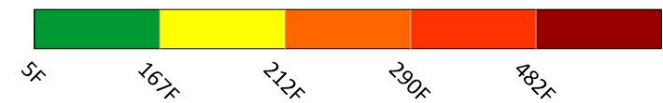
December 5, 2025



December 19, 2025



December 30, 2025



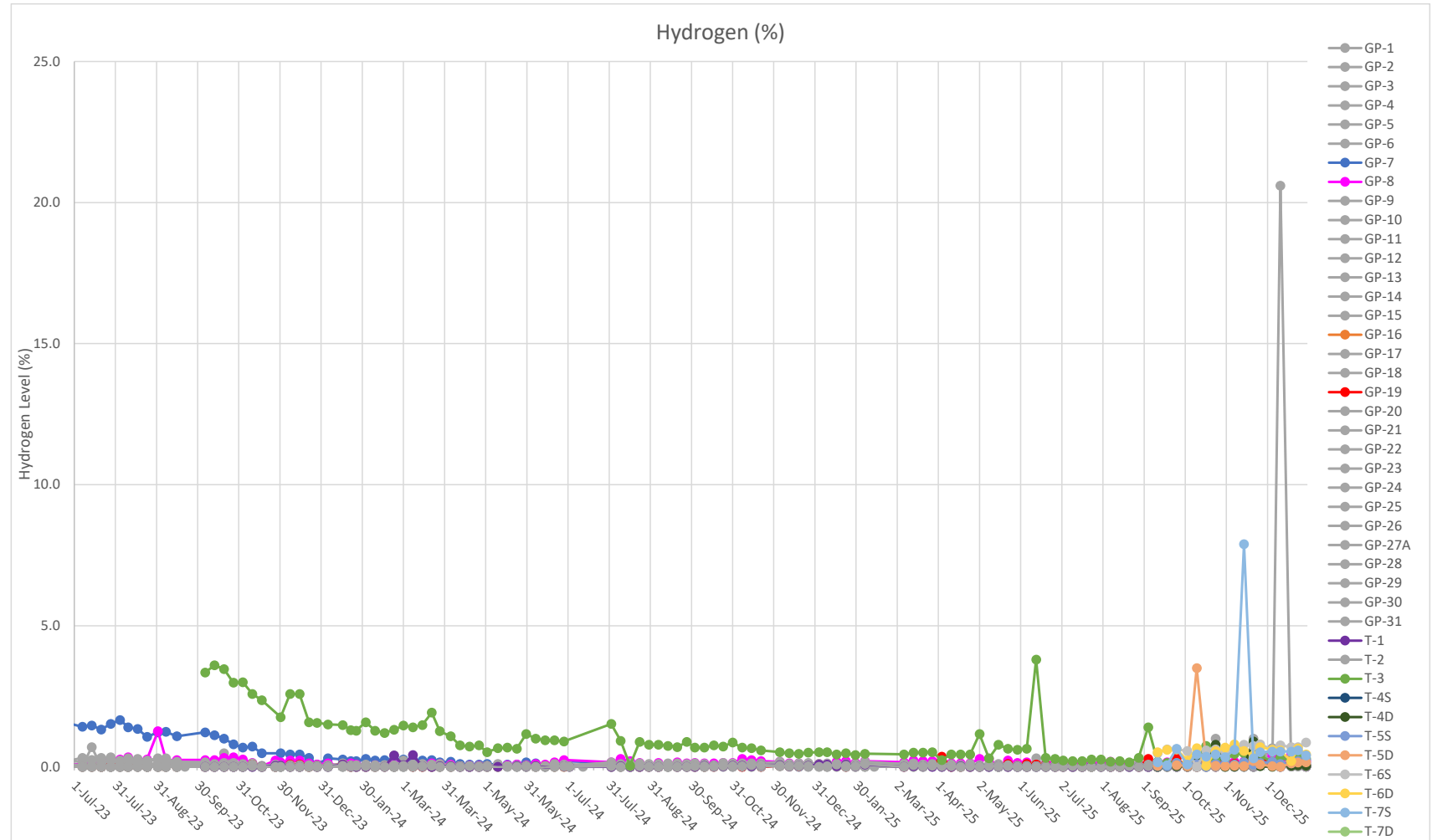
- Data taken from first monitoring event of each month unless noted otherwise
- Data has been interpolated between data points
- Datapoints (probe locations) represented in red
- Temperatures are measured in degrees Fahrenheit
- Ground contours are of existing ground at beginning of project, with design contours added for after addition of fill

Hydrogen

The hydrogen measurements in T-3 have risen slightly to 0.3% since September, but continue to exhibit overall stable trends.

The new thermistor wells have recorded varying hydrogen levels, with T-6S and T-6D exhibiting higher levels around 0.7%. T6S has remained around this level, but T-6D has exhibited lower levels during some of the monitoring events.

Hydrogen remains very low in all other wells.



Oxygen

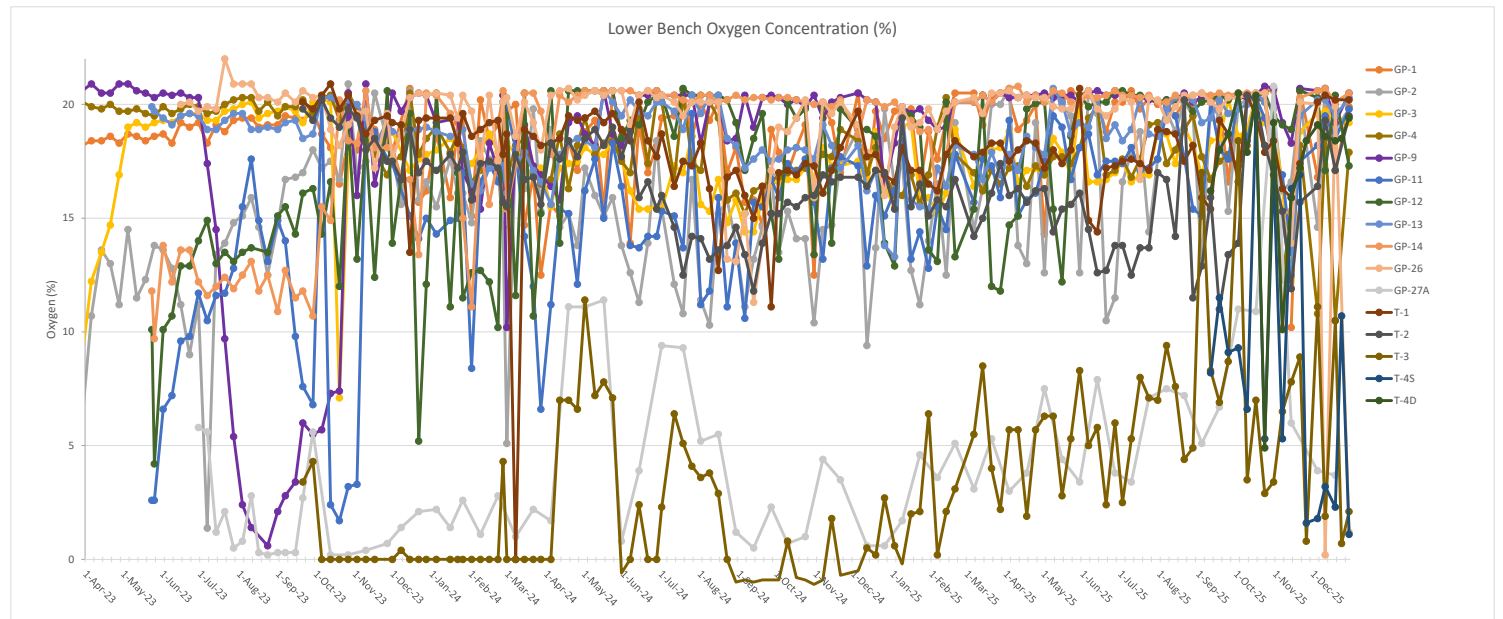
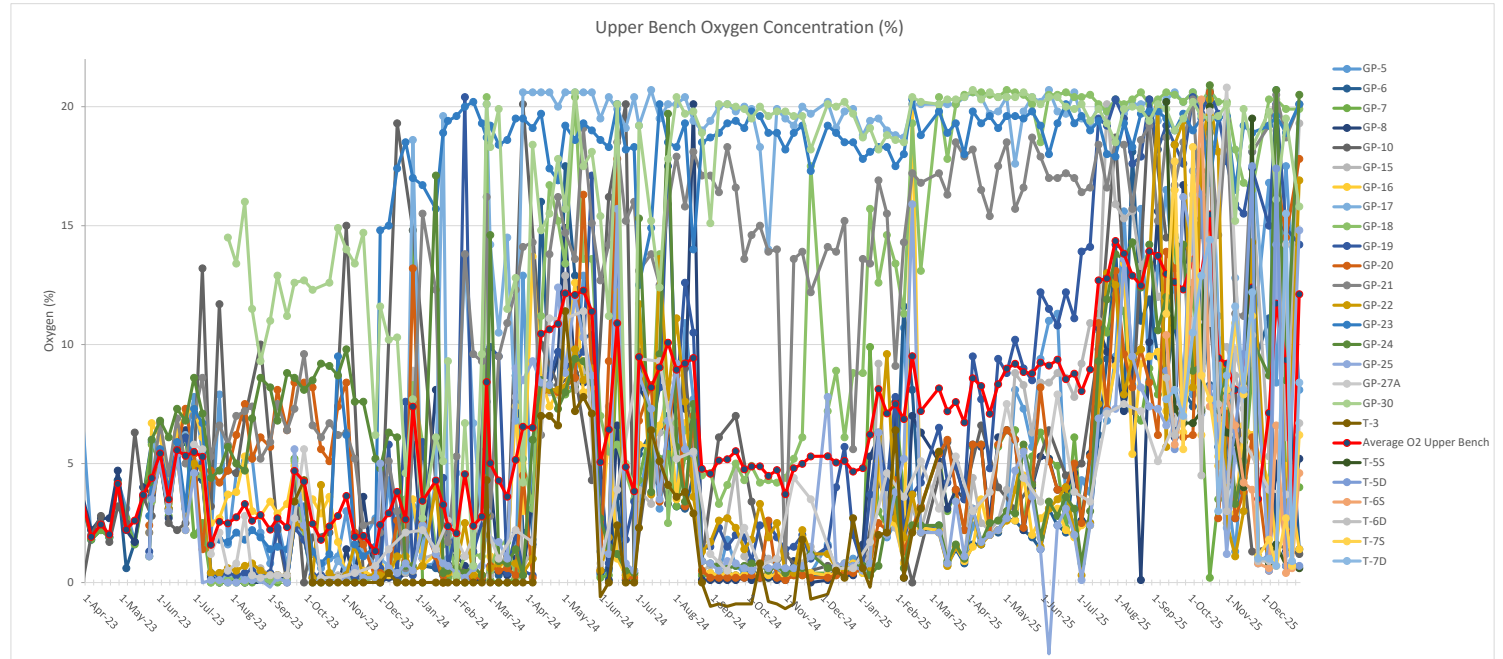
The oldest portion of the landfill is likely relatively inert and biologically inactive, producing very little methane. As a result, the pore space is full of atmospheric air leading to the generally high oxygen concentrations. In plan view, oxygen levels have been increasing since January of 2025.

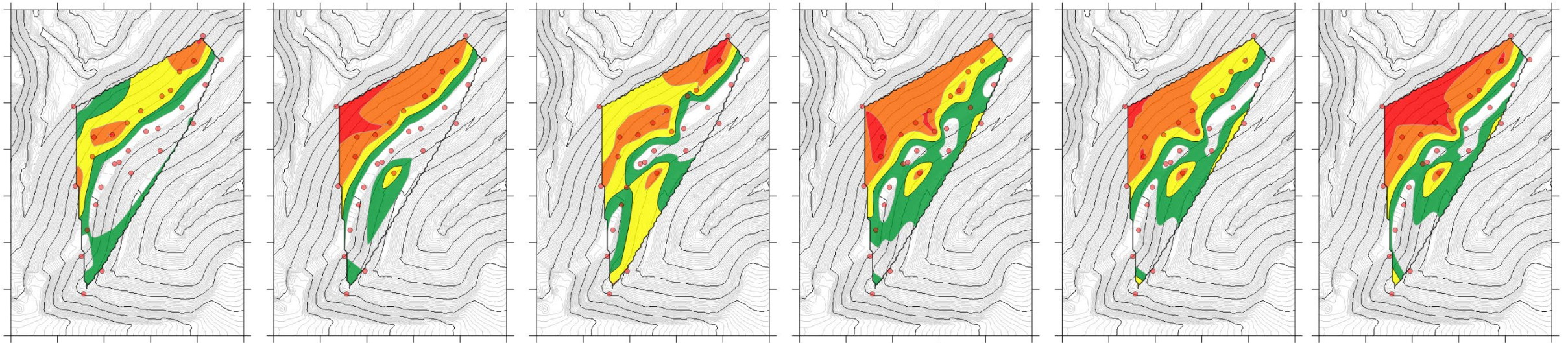
Oxygen levels in many of the GPs in the upper bench appear to oscillate seasonally, with higher oxygen levels in the summer months. Initially, it was suspected this was related to atmospheric pressure swings; however, the highest average pressure and greatest swings occur in the winter, while highest oxygen levels occur in the summer. It is now theorized that oxygen entry in the winter is inhibited by snow cover and frozen soil.

An incursion of atmospheric air has been detected in upper bench oxygen concentrations starting July 1, 2025. Areas on the plan view that were consistently green (<10% O₂) have changed to yellow (<15% O₂) or orange (<20% O₂). Such a trend has been detected previously starting April 1, 2024. Both events were preceded by very large fluctuations in atmospheric pressure of up to 1 Bar.

April 2024 triggered a smolder resurgence based on CO, as did Jan 1 2025 O₂ increase. The July 1 2025 increase seems to have caused a similar increase.

The surface of the fire area was examined in November for evidence of air intrusion such as cracks or erosion rills, and no evidence of air intrusion was found.





September 2023

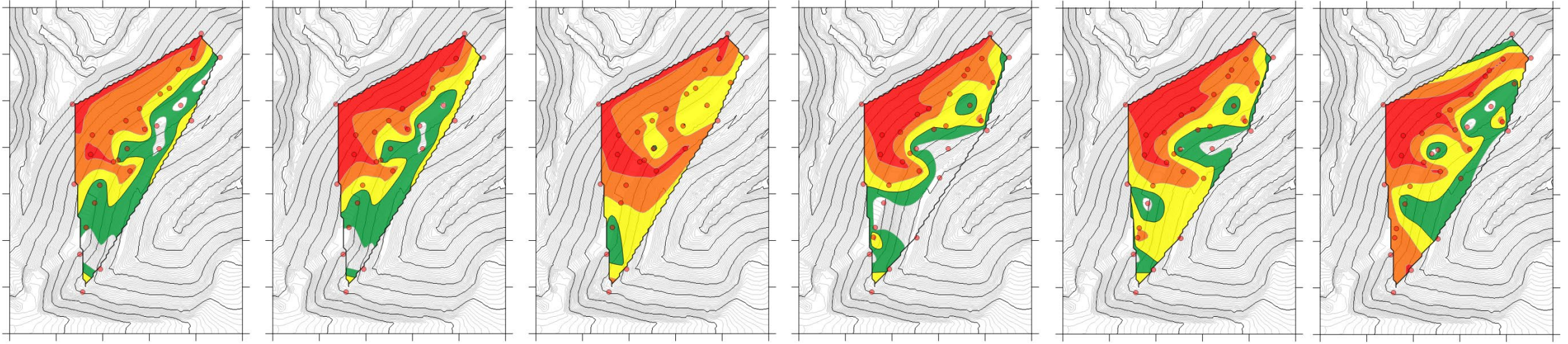
December 2023

March 2024

June 2024

September 2024

December 2024



March 2025

June 2025

September 2025

December 5, 2025

December 19, 2025

December 30, 2025

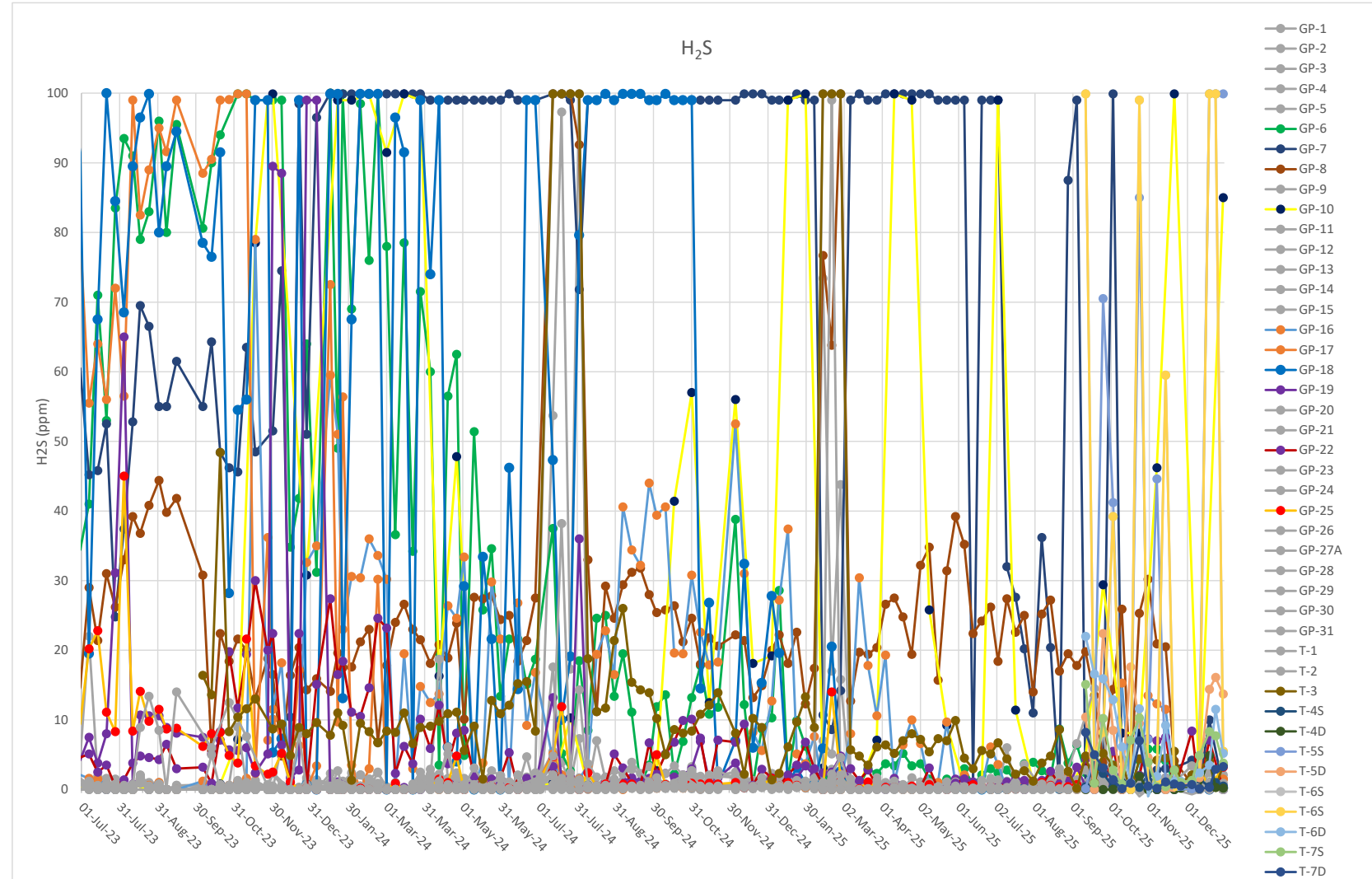


- Data taken from first monitoring event of each month unless noted otherwise
- Data has been interpolated between data points
- Datapoints (probe locations) represented in red
- O2 levels are measured in percent composition of sampled gas
- Ground contours are of existing ground at beginning of project, with design contours added for after addition of fill

Hydrogen Sulfide

H₂S data continues to be noisy, likely affected by atmospheric pressure fluctuation. Most locations are low, but T-5S has recorded over 99.9 ppm for the past three monitoring events.

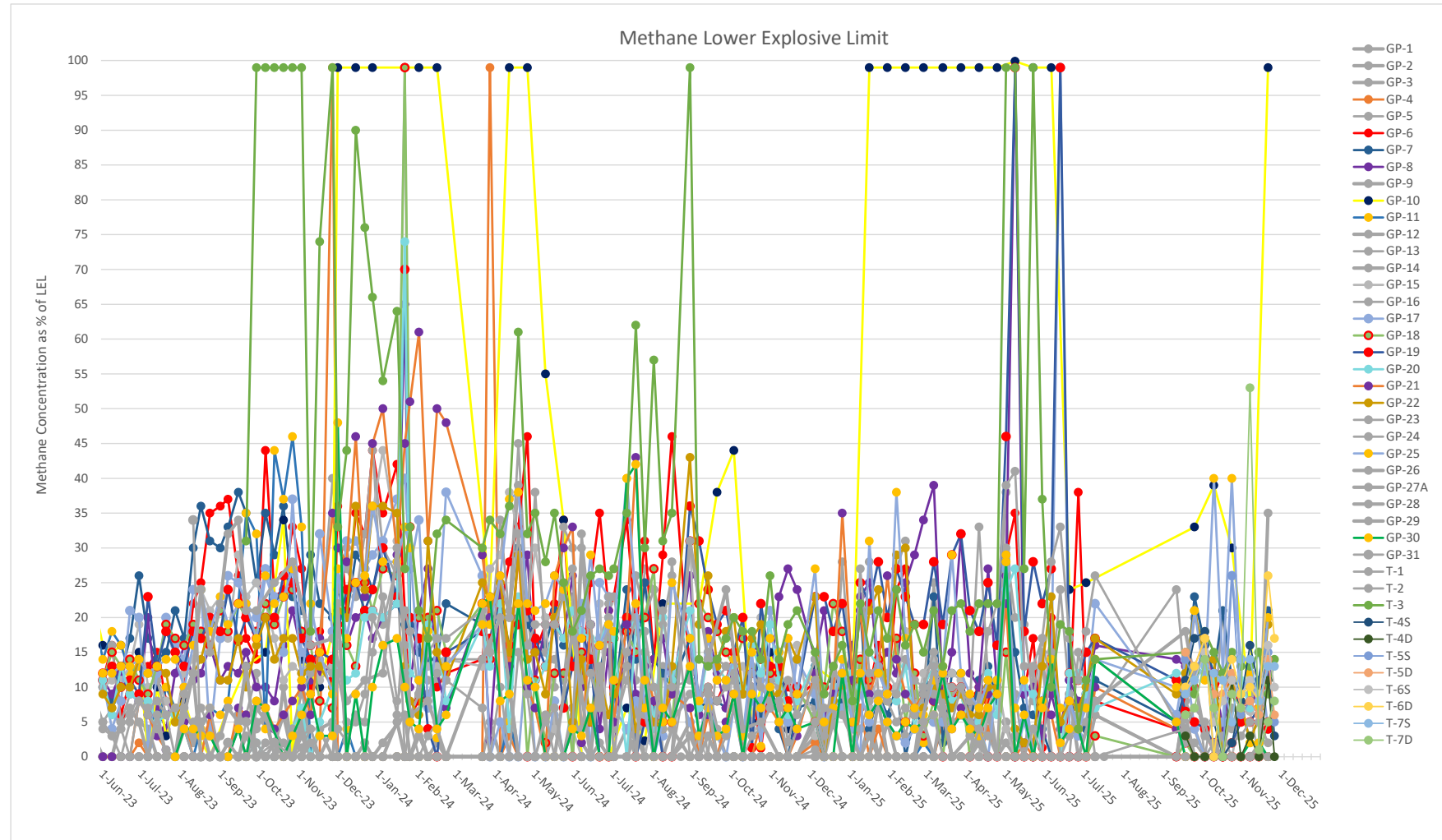
As mentioned previously, it is possible that the H₂S sensors are being impacted by CO cross interference. This seems to be confirmed as overall CO concentrations are decreasing, and the reported H₂S concentrations are dropping as well.



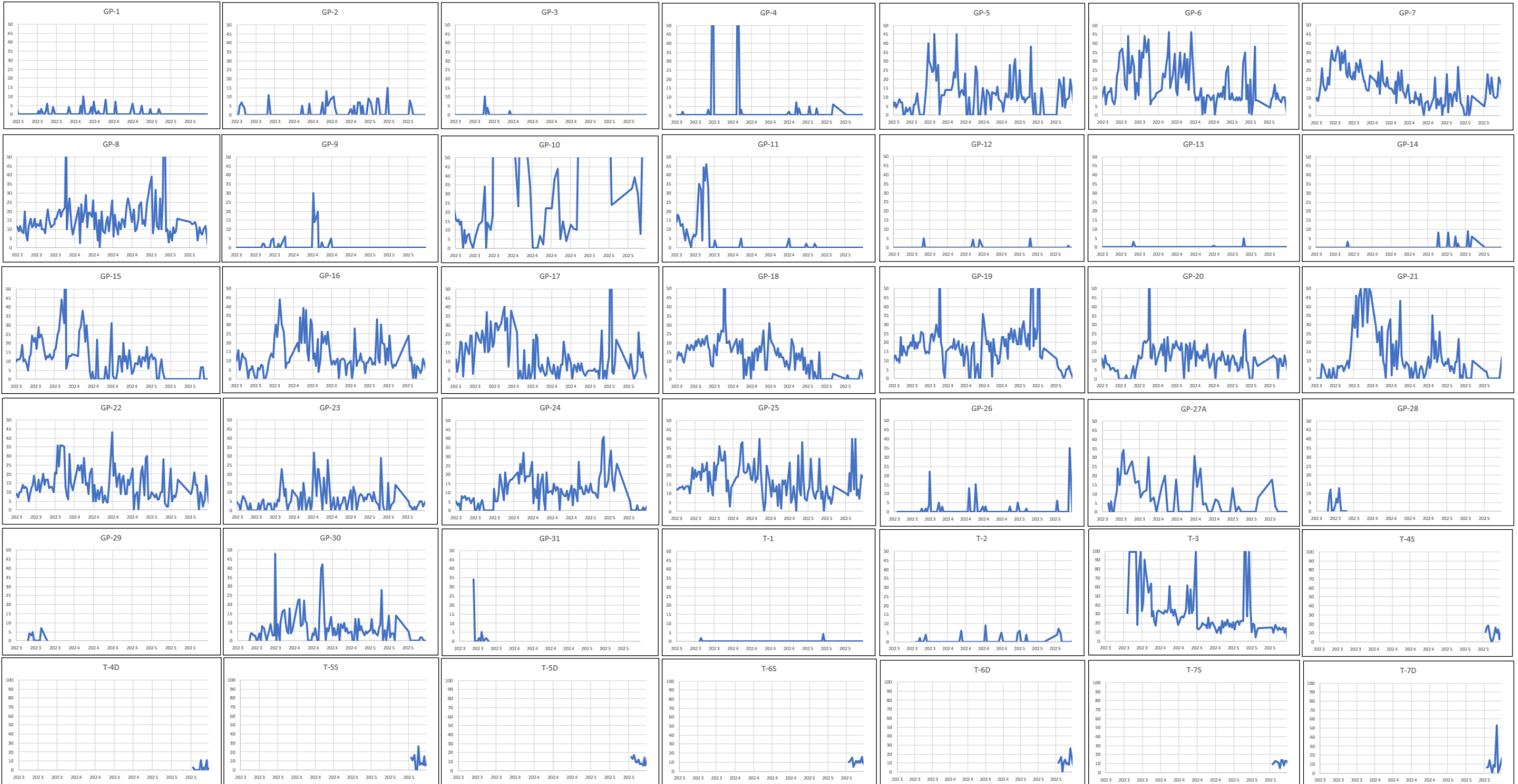
Lower Explosive Limit

Several data points are fluctuating wildly – the direct methane composition is a better indicator of levels within the landfill.

As LEL is measured with the MultiRAE, the last three monitoring events were not recorded in July, but since resuming levels have been similar to those previously recorded with most monitoring points reporting below 20% of the LEL.



LEL for individual GP

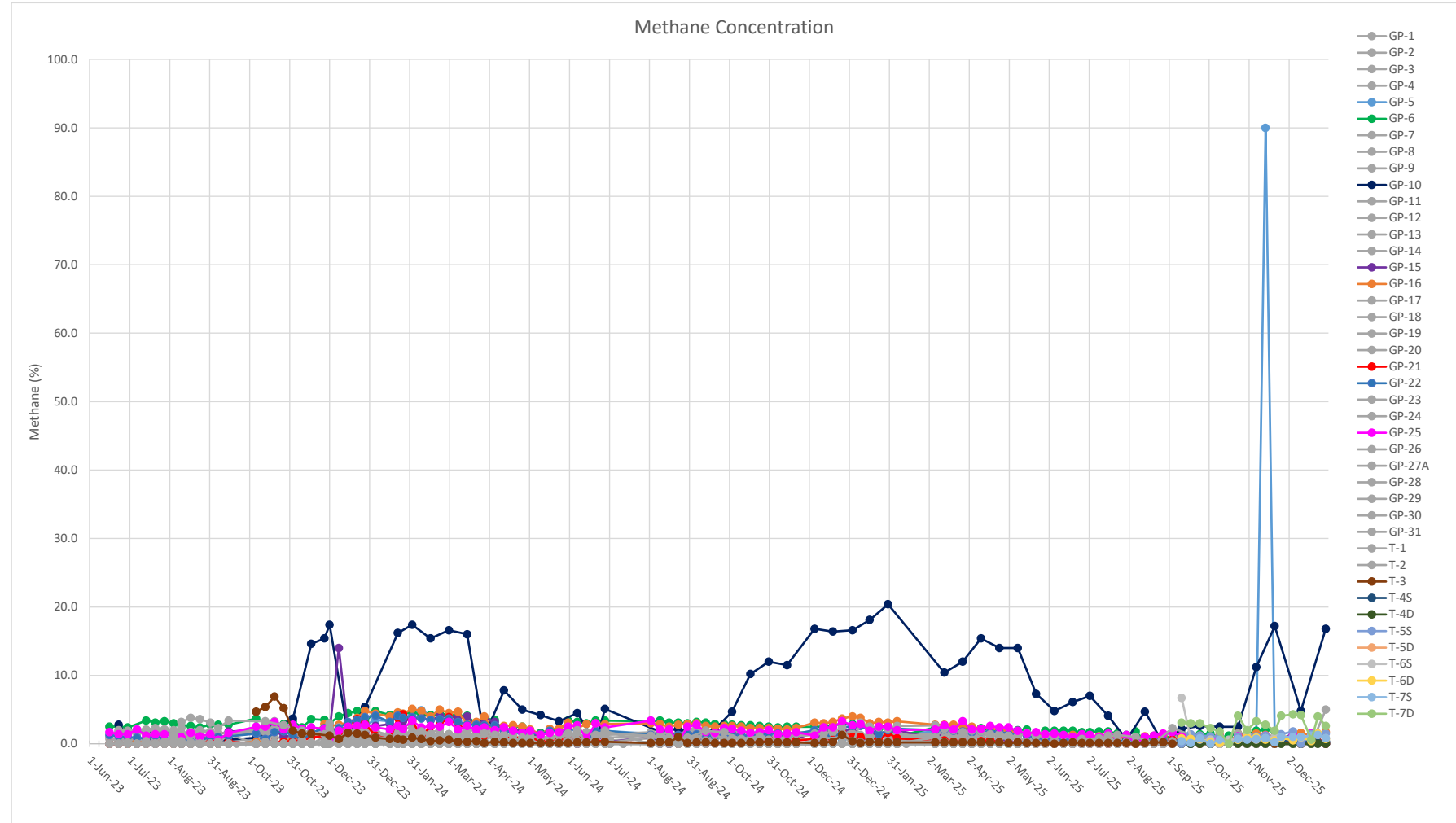


Methane

Methane levels for most wells are converging between 0 and 2.5% indicating that landfill is not biologically active.

Only well GP-10 has been indicating higher methane concentrations, and as shown has continued around 17%.

There appears to be a seasonal fluctuation with high methane levels occurring in Jan of each year in crest monitor GP-10. The cause is unclear, but LFCI believes this is possibly due to freezing or snow pack on the landfill surface preventing methane from escaping. This pattern is appearing again as the new year comes.

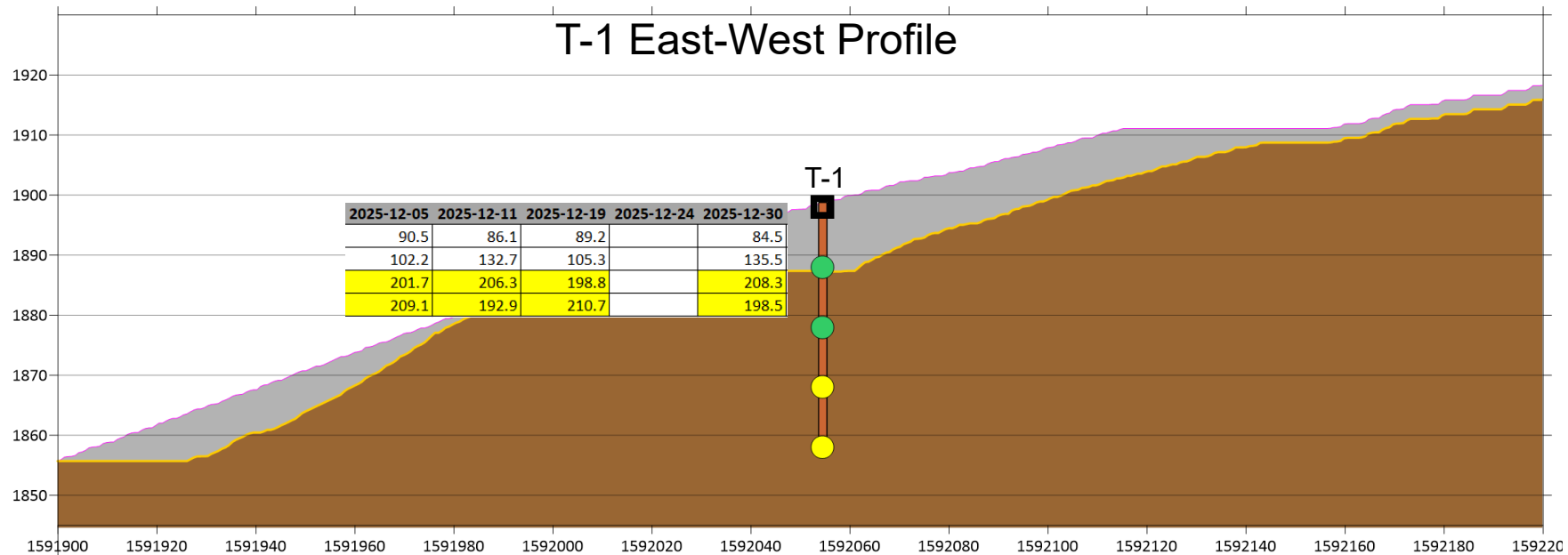




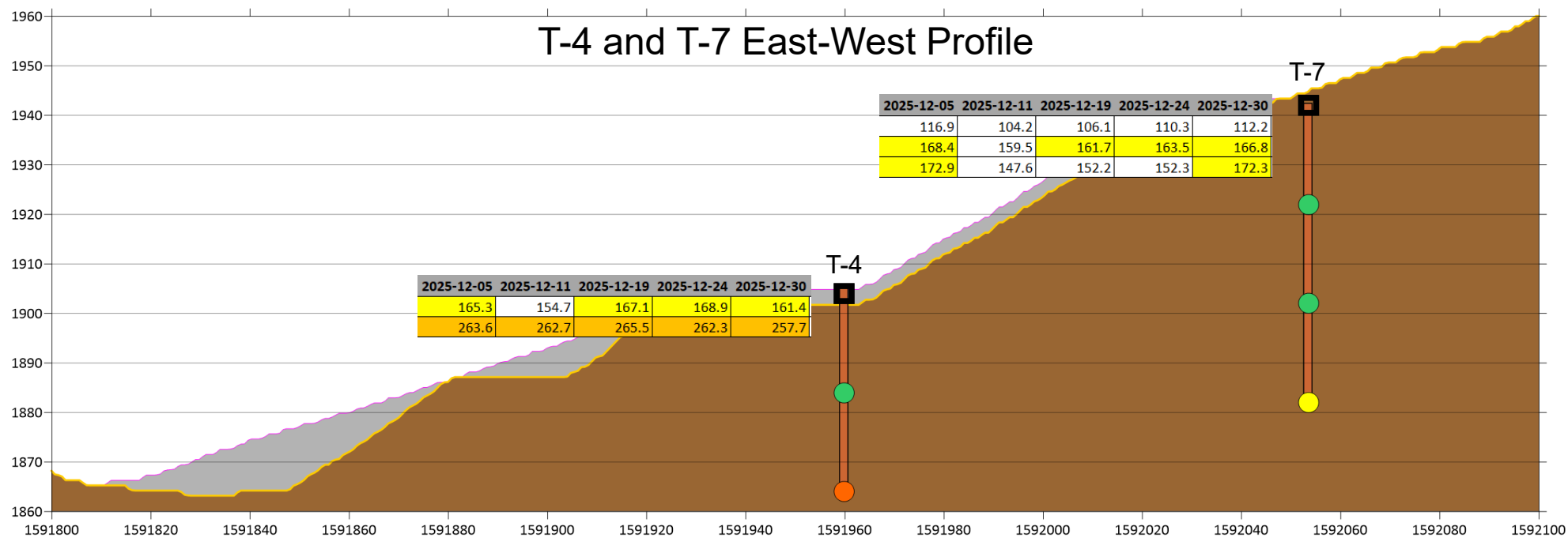
● High Temp (>200) □ High CO ▲ High H2S ▼ High VOC



T-1 East-West Profile



T-4 and T-7 East-West Profile



Data Interpretation

LFCI believes that suppression efforts continue to work, but slowly after the initial decrease in smolder activity. CO levels and temperatures have decreased dramatically since cover fill was placed. Temperatures initially decreased, but have levelled off to a slower cooling trend since December 2024, as have most gas concentrations. The temperature graphs indicate that the cooling is following a trend similar to a logarithmic decay model.

Temperatures have dropped significantly all around to Dec. 2024 when the trend has shifted to a steady condition, with minimal changes occurring. In December of 2025, temperatures of the hottest wells (GP-3 and T-4) have continued to decrease at a slow but steady rate.

In LFCI's experience, CO has been the best indicator of suppression at other landfill sites. CO in T-3 has risen between Jan and May 2025, and again decreased June-mid August. In December, CO has exhibited varying measurements, but seems to hover around 3500ppm.

High O2 continues to fluctuate seasonally as a result of increased soil cover permeability during summer months when ground is not frozen. The recent increases in O2 starting July 1, 2025 are of some concern but December has continued to see some decrease in oxygen compared to other recent months. As atmospheric pressure has been increasing, large ambient pressure swings have been noted, and the cover soil has been inspected and no major concerns found.

Additional cover was recommended in area of T-4 where cover soil was excavated to make room for developing the new wells. This work was completed.

LFCI believes that the waste continues to smolder underneath GP-3 and T-1 (elevated temperature) but the rate of smolder is steadily decreasing. Also, a 'chimney' effect is occurring, causing higher levels of indicator gases at T-3, GP-8. Of greatest concern at this time is the sign of active smolder developing around T-4. As elevated CO and temperature continue in this area, additional suppression measures became necessary in that area and have been carried out.