



May 14, 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 – April

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 April 2026 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 April 2026. The monitoring data summary through April 2026 from Landfill Fire Control, Inc. (LFCI) is attached.

Draft Interim Action Work Plan (IAWP) comments were received from Ecology on April 2, a review call was held on April 16, and a response letter was submitted on April 21 to confirm revisions needed.

The 2025 Annual Groundwater Monitoring Report was submitted on April 1, 2026.

The Q1 groundwater monitoring report was progressed.

Deviations from Plans (if any):

None.

Deviations Description from the Scope of Work and Schedule:

None.

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
- May Progress Report
- Q1 Groundwater Report

Please contact me to discuss any of the above items.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Ian Sutton'.

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

Enclosures: LFCI Data Update – April 2026

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

May 11th, 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 – April 2026

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 April has continued to exhibit some signs of this slow response with relatively stable temperatures. Temperature in T-1 and GP-3 has continued the decreasing trend, and the recently installed T-4 has continued to indicate higher but decreasing temperatures. These high temperatures have started decreasing again following a brief heating trend between mid February and late March, particularly in GP-3.

The elevated temperatures in T-4 are isolated from the other elevated areas although the temperatures are very similar. LFCI believes that there is a secondary hot spot in the area of T-4, with smolder gases migrating up slope to be detected at T-6 and T-7. The temperature in T-4 is following the same trends as GP-3 and T-1.

Through close monitoring of the area, the extended high CO and temperatures have lead LFCI to recommend additional cover in that area to address the slopes that were cut into to install T-4. Since the soil was placed in, CO and temperature have continued to slowly decline although April has seen an increase in general CO levels and this will be observed closely through the current monitoring program to ensure action is taken if necessary.

When considering the 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). This suggests that the soil cover may be dessicating and cracking to some degree.

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

LANDFILL FIRE CONTROL INC.

#8-1225 East Keith Rd., North Vancouver, BC – V7J 1J3
P: (604)-986-7723 E: sperling@sperlinghansen.com
www.landfillfire.com



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 LFCI expects the upcoming spring months to show increasing oxygen levels within the waste mass.

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 smolder activity in this area is steadily decreasing, however slowly. Based on the extinguishment target of temperature dropping below 180°F, on account of the flattening of the temperature curves of the hottest wells, we are now projecting that the fire will be declared extinguished mid year 2027 if no further intervention is taken to inhibit air entry. Also, the increasing CO concentrations around T-4 at T-6 and T-7 indicate that further soil application may be required in that area.

Based on this assessment, 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 continues to have the professional 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



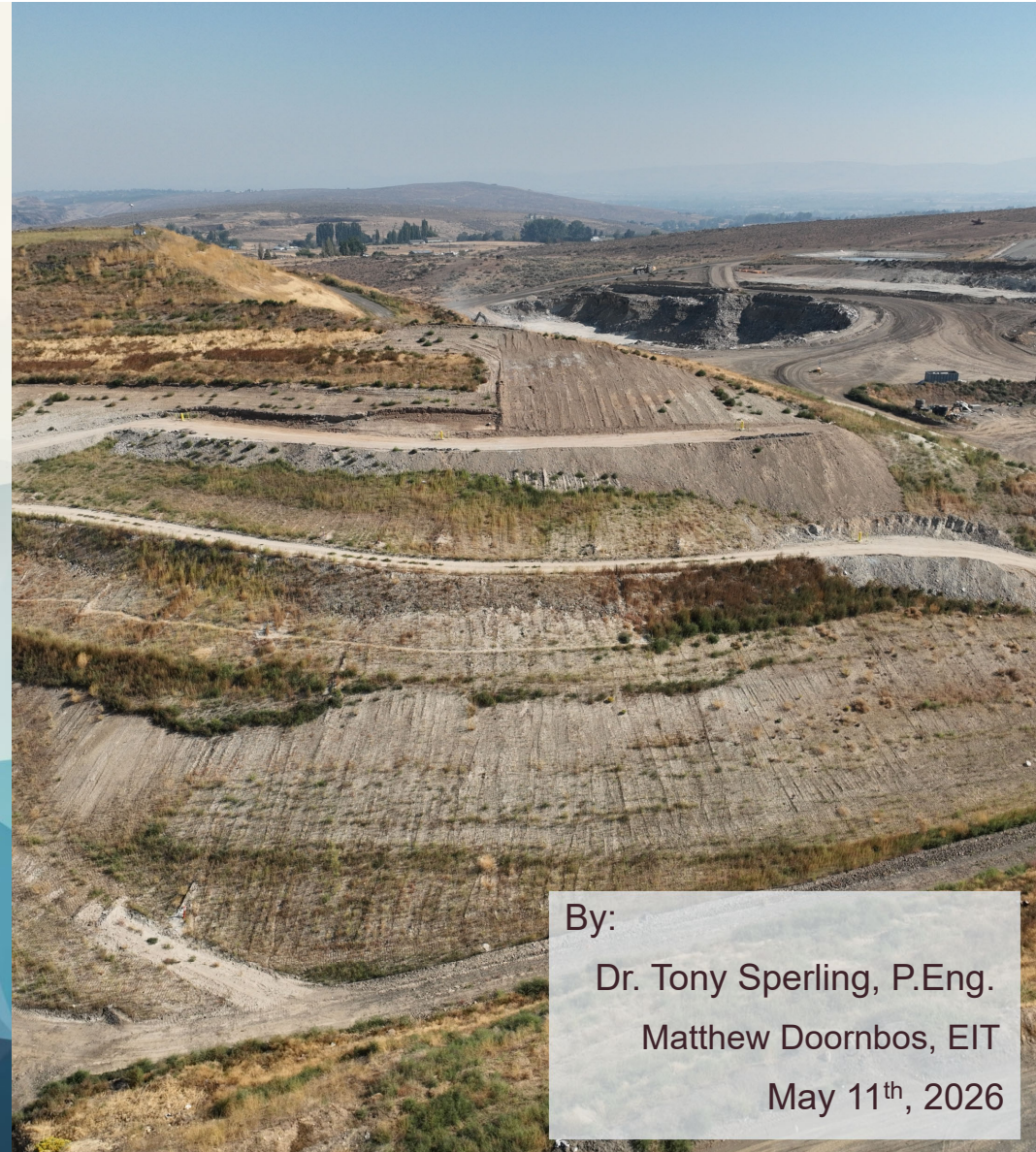
May 11th, 2026



DTG LPL LANDFILL FIRE INVESTIGATIONS AND MITIGATION

Monthly Monitoring Data Review

April 2026



By:
Dr. Tony Sperling, P.Eng.
Matthew Doornbos, EIT
May 11th, 2026

Introduction

BHP Locations

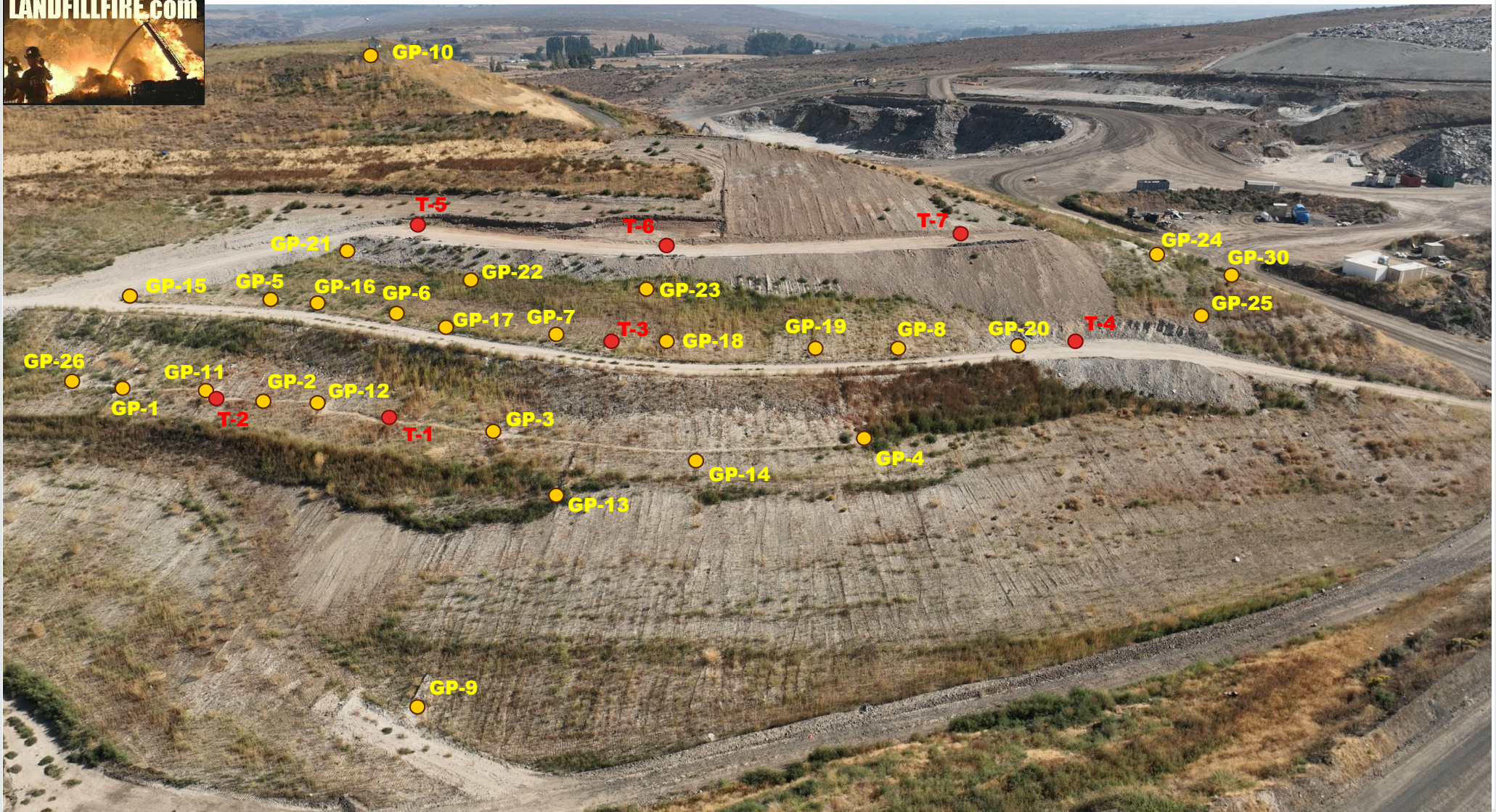
- There have been 31 Ground Probes installed, 3 of which are no longer monitored. 26 probes are monitored weekly, and 2 are monitored on a bi-weekly basis.
- Three thermistor wells were installed in mid-2023, which are monitored at varying depths to better determine the location of the hotspot.
- Four 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.

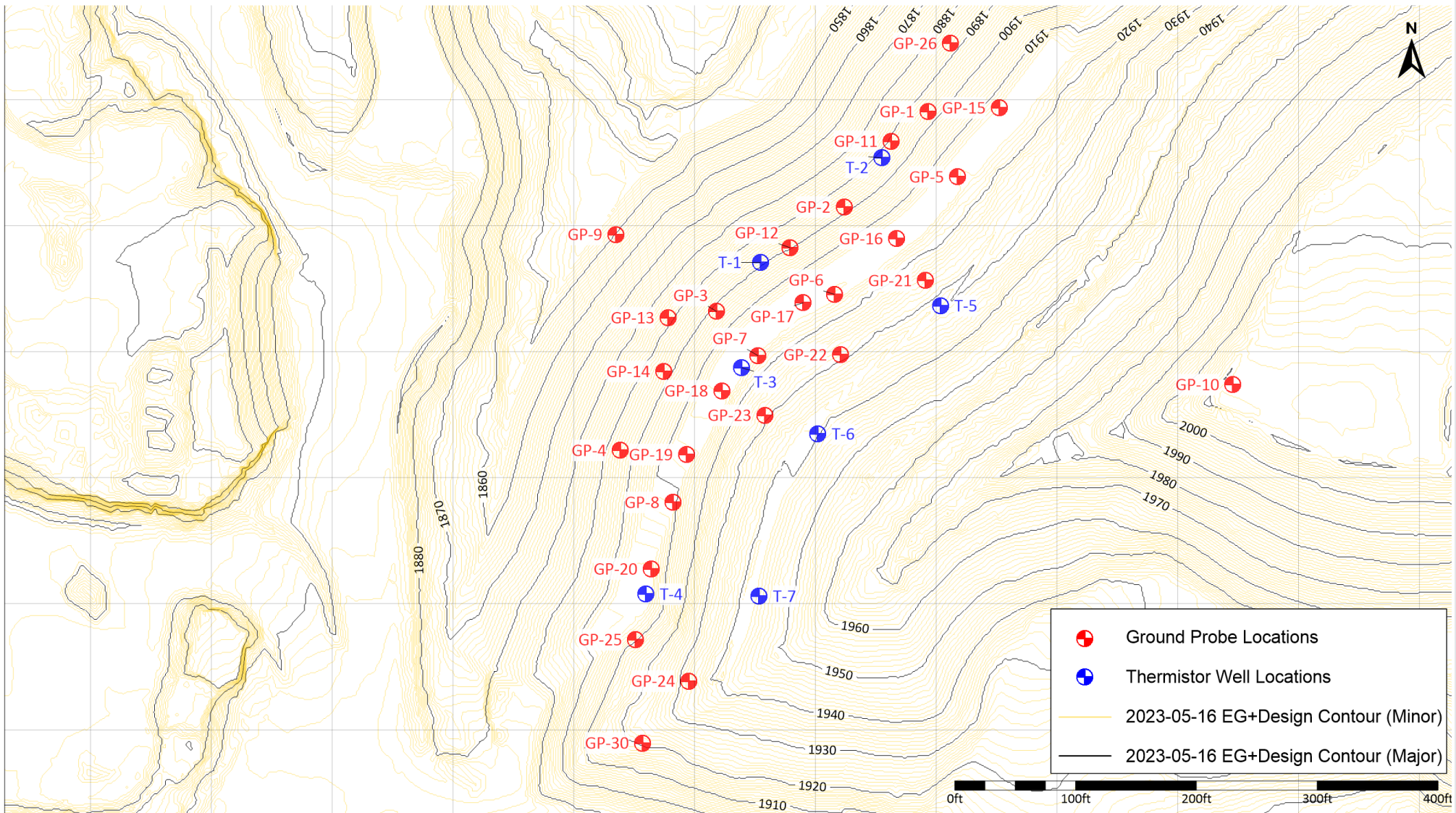
Monitoring Data Review

- 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





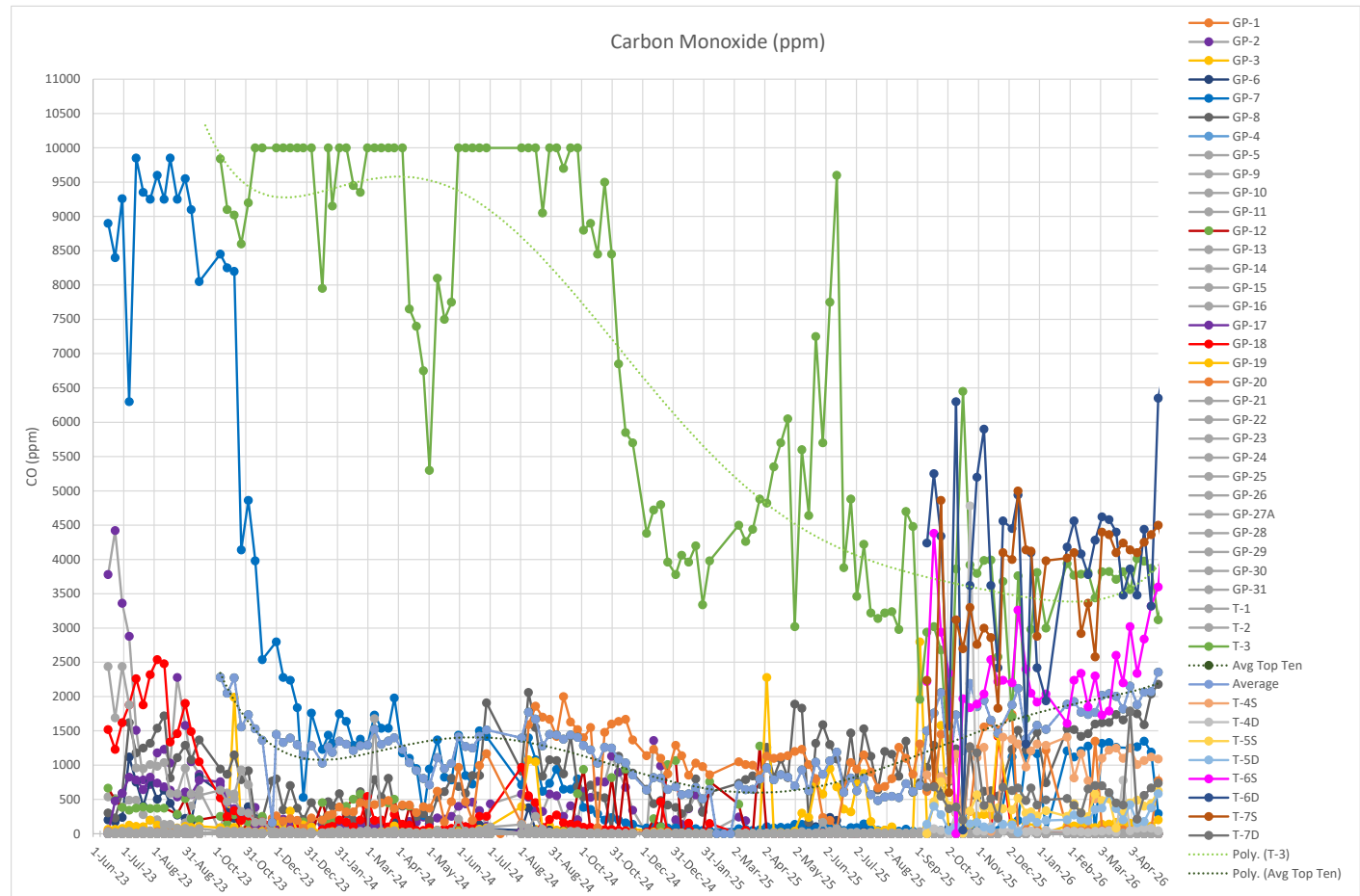


Carbon Monoxide

During the month of April there were no clear trends present in the CO monitoring data. However, it does appear that the southern portion of landfill that is monitored has seen increasing CO over the past two months.

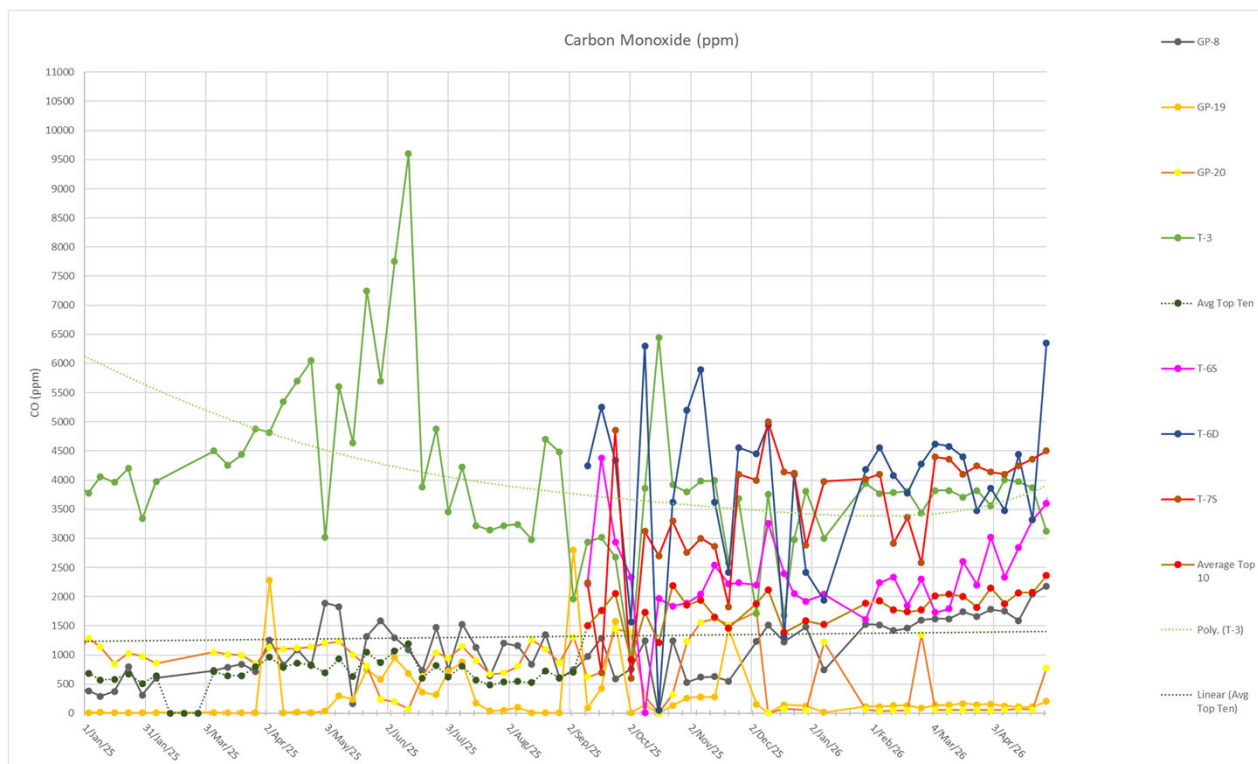
In particular, CO concentration in T-6D has spiked up during the most recent monitoring event, while CO in T-6S has been gradually increasing since early March.

The average of the highest 10 wells was higher than previous months, with the average rising to 2554ppm in the last event of April, primarily as a result of the increased CO in T-6D and T-6S.



Carbon Monoxide 10 Highest

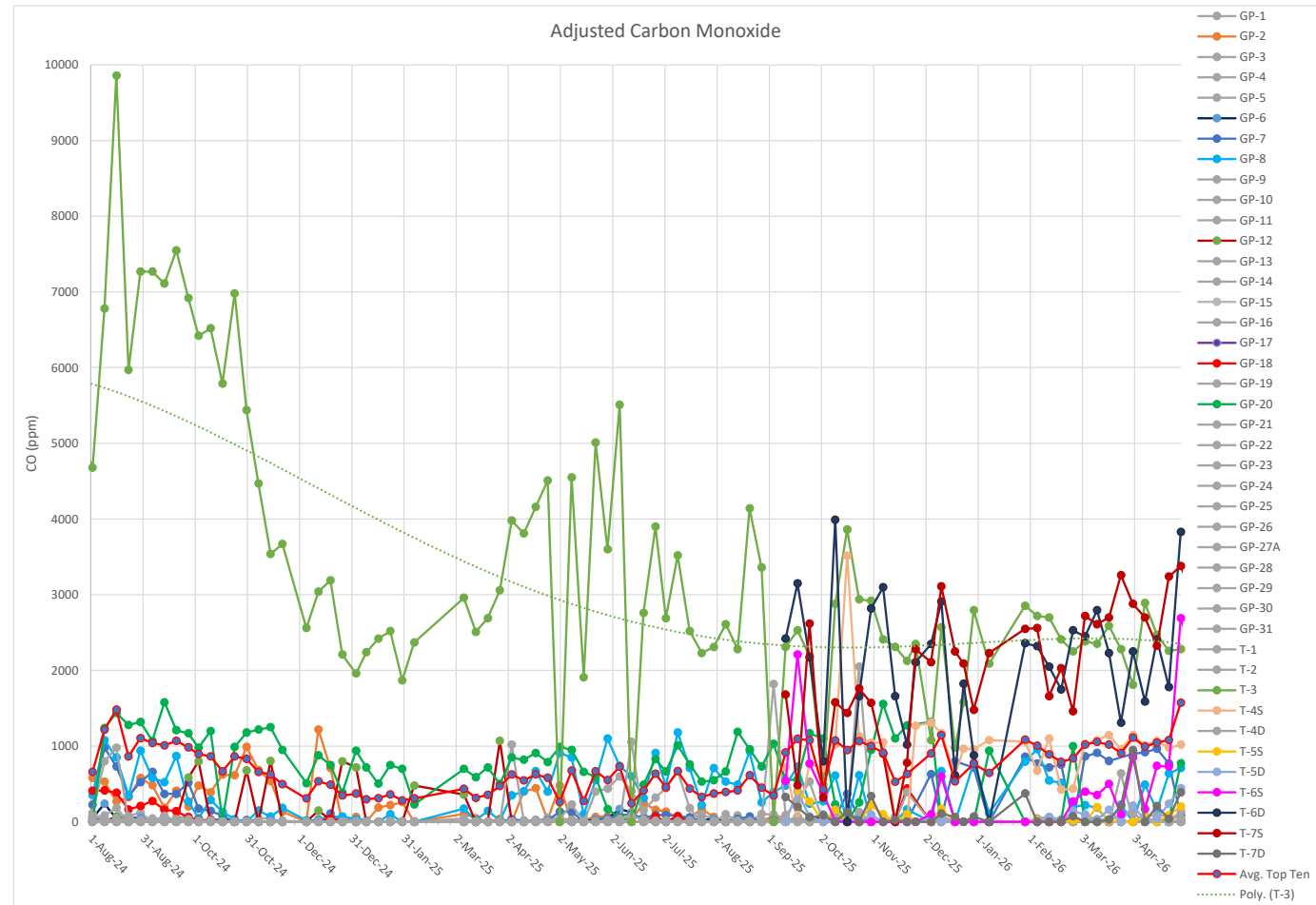
The 10 wells with the highest CO also show a general increase in CO over the past month of monitoring data. The most obvious increases are in T-6D, T-7S, T-6S, and GP-8 which are in the upper area of the slope.



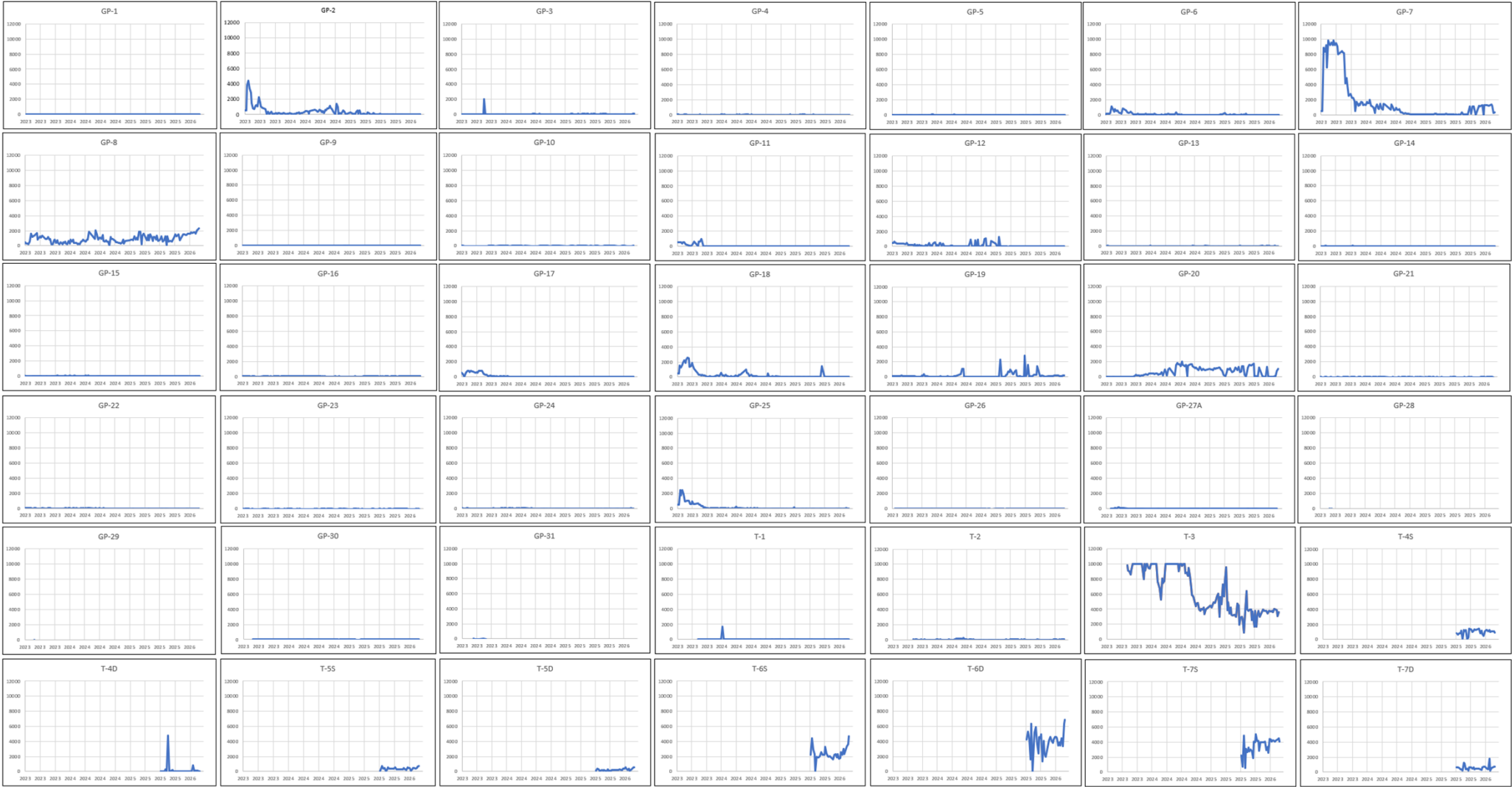
CO Adjusted for H2 Gas

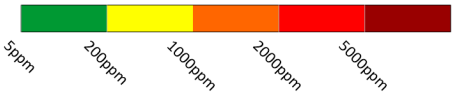
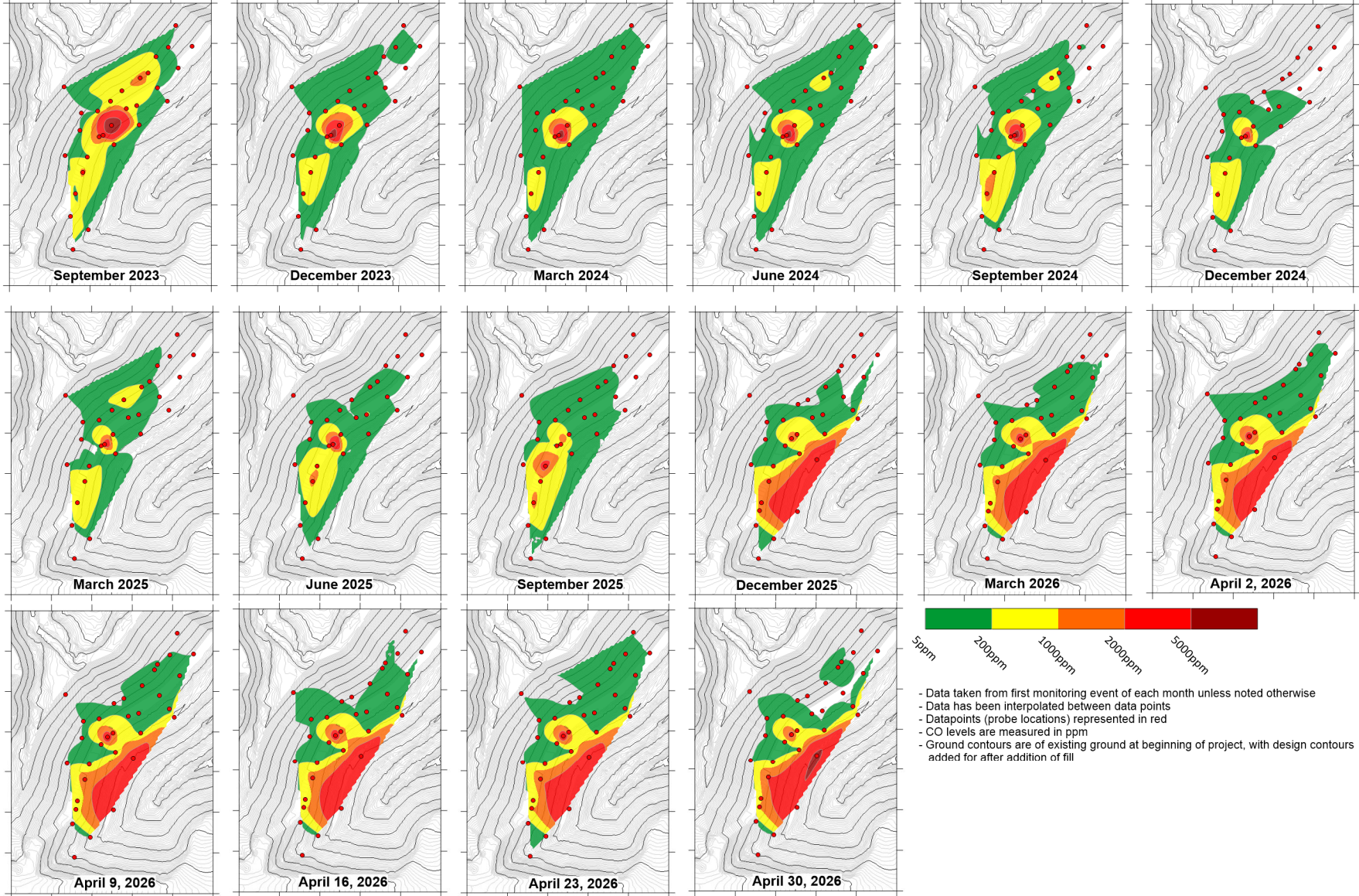
Adjusted CO measurements have been relatively stable since Sept. 2025, with some oscillations. An increase in adjusted CO has been noted in T-7S starting in October, 2025 and in T-6S and T-6D in the most recent readings in May, 2026. The increases in CO suggest increased smolder activity in the southern area in the vicinity of T-6 and T-7.

In 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 same general trends of increasing CO in the southern wells (T-6 and T-7) are present, however of note is that GP-8 appears to be steady at a relatively lower CO level.



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

LFCI Temperature Scale

LFCI uses this temperature scale to evaluate subsurface temperature data.

Currently, the highest recorded temperature at the site is 250.6F, at GP-3 which is in the middle range of the “Suspected Subsurface Exothermic Reaction in MSW”, indicative of a very gradual smolder.

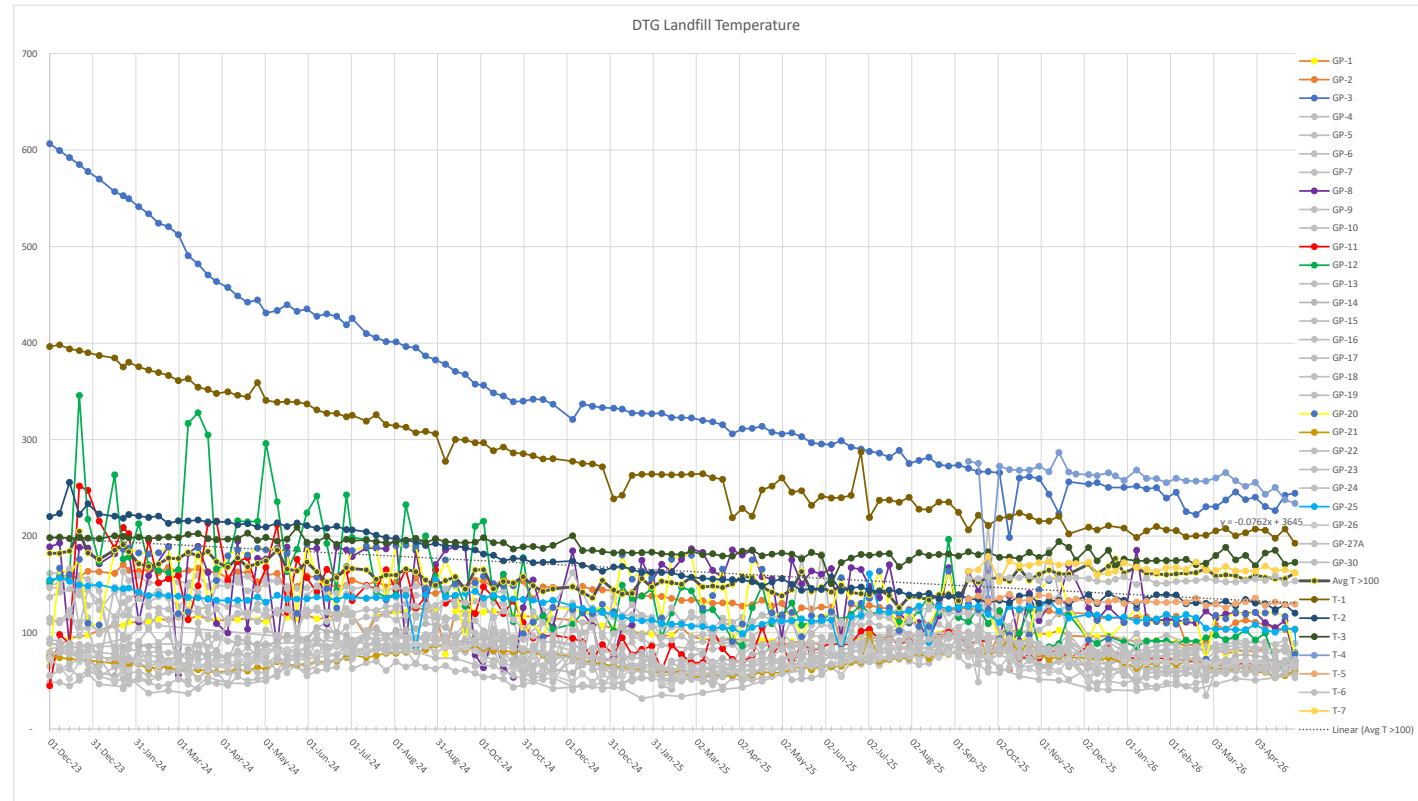
This well is on a steady cooling trend, with temperatures decreasing from a high of 600F.

Fahrenheit Deg F	Celsius Deg C			
1,832	1,000			
1,382	750			
932	500	Fire	Fire	
608	320			Upper Limit of Torrefaction (low temp. Pyrolysis)
601	316			Wood ignites spontaneously
500	260			
400	204	Exothermic Decay of Wood	Exothermic Pyrolysis	
392	200			
392	200			Minimum temperature for Industrial Water Gas Shift Reaction (fast)
324	162			Melting point of EVOH Resin
300	149			
290	143	Suspected Subsurface Exothermic Reaction in MSW	Possible Exothermic Reactions	
280	138			
270	132			Melting point of HDPE Liner (125 to 130C)
260	127			
250	121			
240	116			
230	110			
220	104			Trigger Temperature for Exothermic Chemical Activity (104C)
212	100			Boiling Point of Water
210	99			
200	93	Heat Transfer and Exothermic Metal Oxidation	Chemical Heating Up	
190	88			
180	82			
176	80			Maximum Biological Temperature per LFCI experience
175	79	Trigger for Elevated Temperatures in Gas Extraction Wells		
170	77			
167	75	Aerobic Biological Decomposition	Aerobic Warm	
165	74			Upper Limit of Aerobic Biologic Decomposition Temps.
160	71			Maximum temperature for methanogenesis
150	66			
145	63			Temperature to which vaiance issued for running hot wells
140	60			
131	55	Anaerobic Biological Decomposition	Anaerobic Normal	
130	54			NSPS standard for maximum temperature in well
120	49			
110	43			
100	38			
90	32			
80	27			
70	21			
60	16			

Temperature (F)

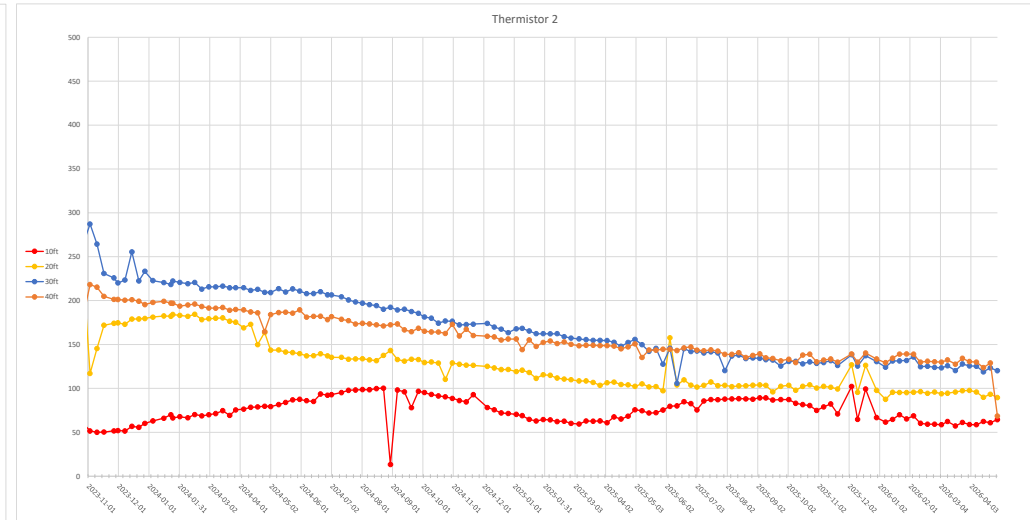
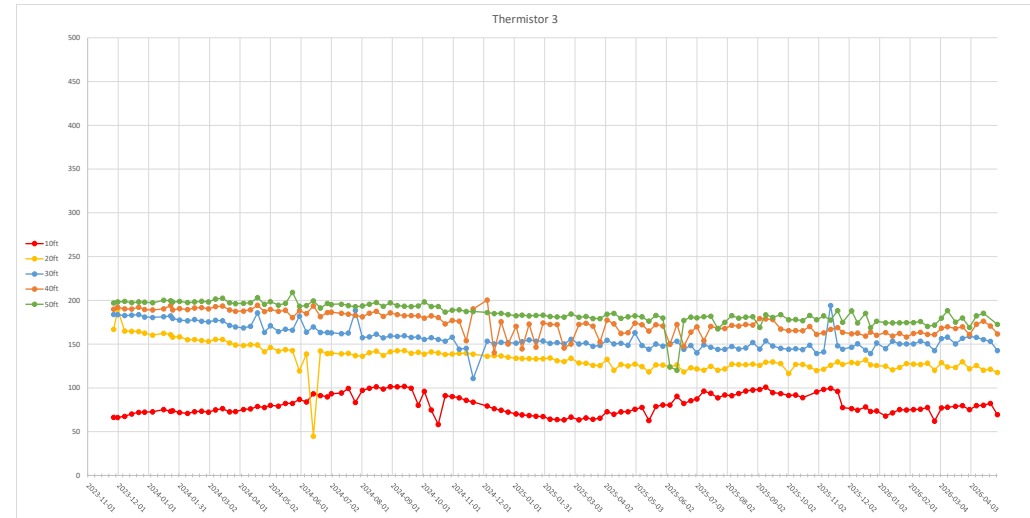
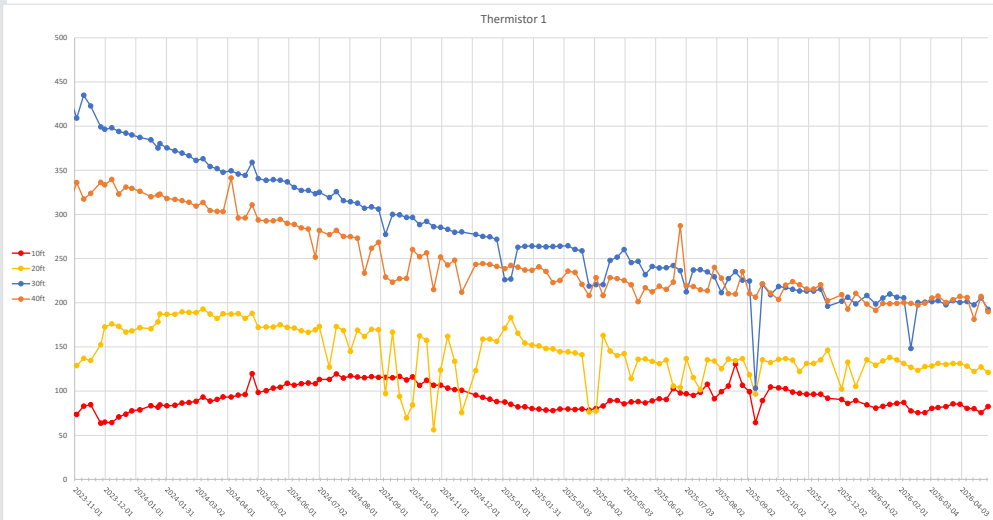
April monitoring saw the continued decreasing temperature trend in GP-3 and T-4. The low temperature wells (gray) continue to show the expected seasonal trend.

LFCI continues to see overall decreasing trends in the three hottest locations (GP-3, T-4, and T-1). The late increases that have now started decreasing are not of major concern at this time but will be monitored closely to ensure decreasing trends continue.



Thermistor Temperatures (T1-T3)

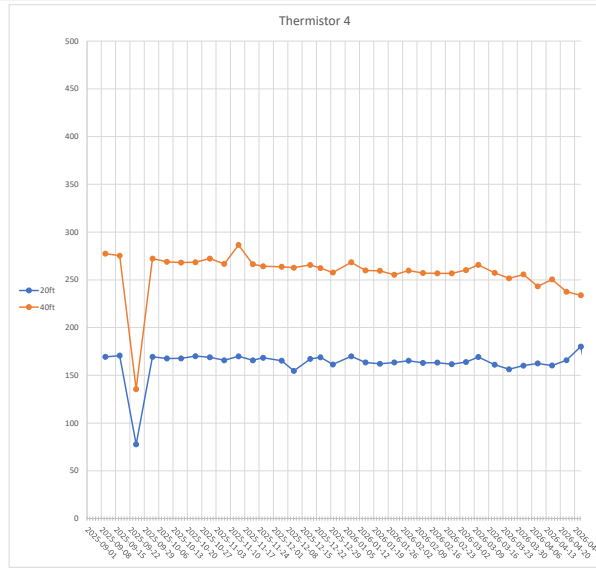
Thermistor temperatures are generally trending downward, but the rate of cooling appears to be slowing in T-1, which was historically the hottest well. T-2 and T-3 temperatures are all trending downward as well. Shallow locations in all three thermistor wells continue to show seasonal warming and cooling trends. With all temperatures in the thermistors dropping below 200F, temperatures are now below the boiling point of water, and in the chemical heating up zone, no longer indicative of exothermic activity.



Thermistor Temperatures (T4-T7)

The thermistors installed in 2025 seem to exhibit mostly stable trends, with little fluctuation in temperature seen over the 8 months of monitoring. T-4 has shown a gradual decrease in temperature over time, while other wells remain at the same level (but at cooler temperatures) as of April, 2026.

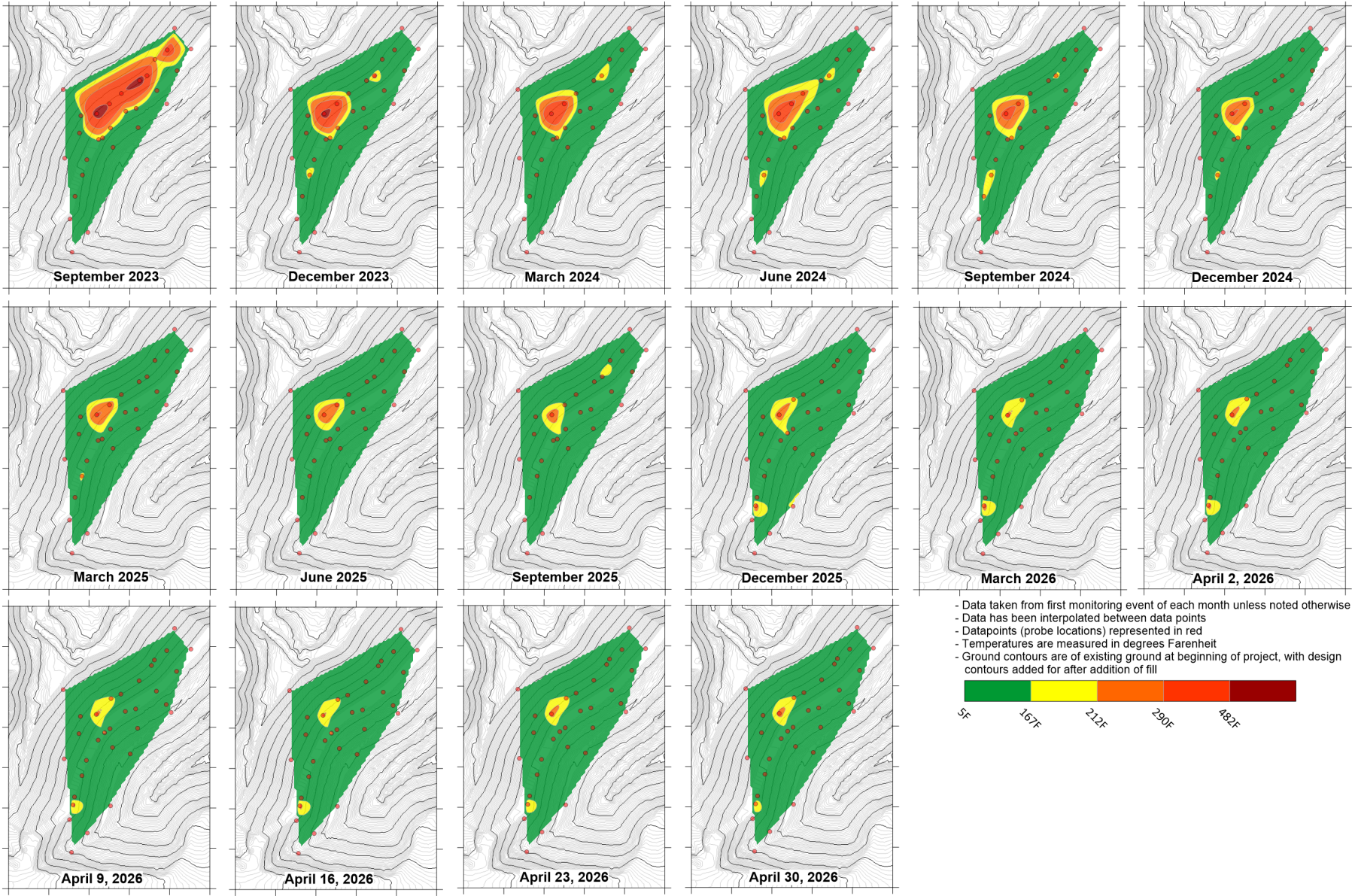
The observed temperatures in the wells of 100 to 150F are normal temperatures of aerobically active landfills and at the low end of temperatures seen across the site. However, T-4 is exhibiting elevated temperatures similar to that seen at the hotspot in GP-3. 238F is 114C, which is still an abnormally high temperature indicative of nearby smoldering activity.



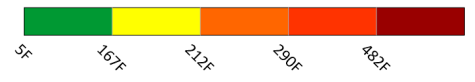
Heat Map Interpretation

The heat map shows that the main fire zone has been cooling 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 since late 2025. During LFCI's initial site inspection active smoke and elevated temperatures were noted in that area, and this area was covered with soil as part of the initial fire response. LFCI has been 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 then implemented and temperatures continued to fall through the February and March monitoring events. However; as discussed above, the April monitoring events have seen an increase in CO concentrations around T-6, T-7 and GP-8 in the upper southern quadrant of the landfill. This area should be monitored closely during May to determine if additional oxygen suppression intervention is necessary.

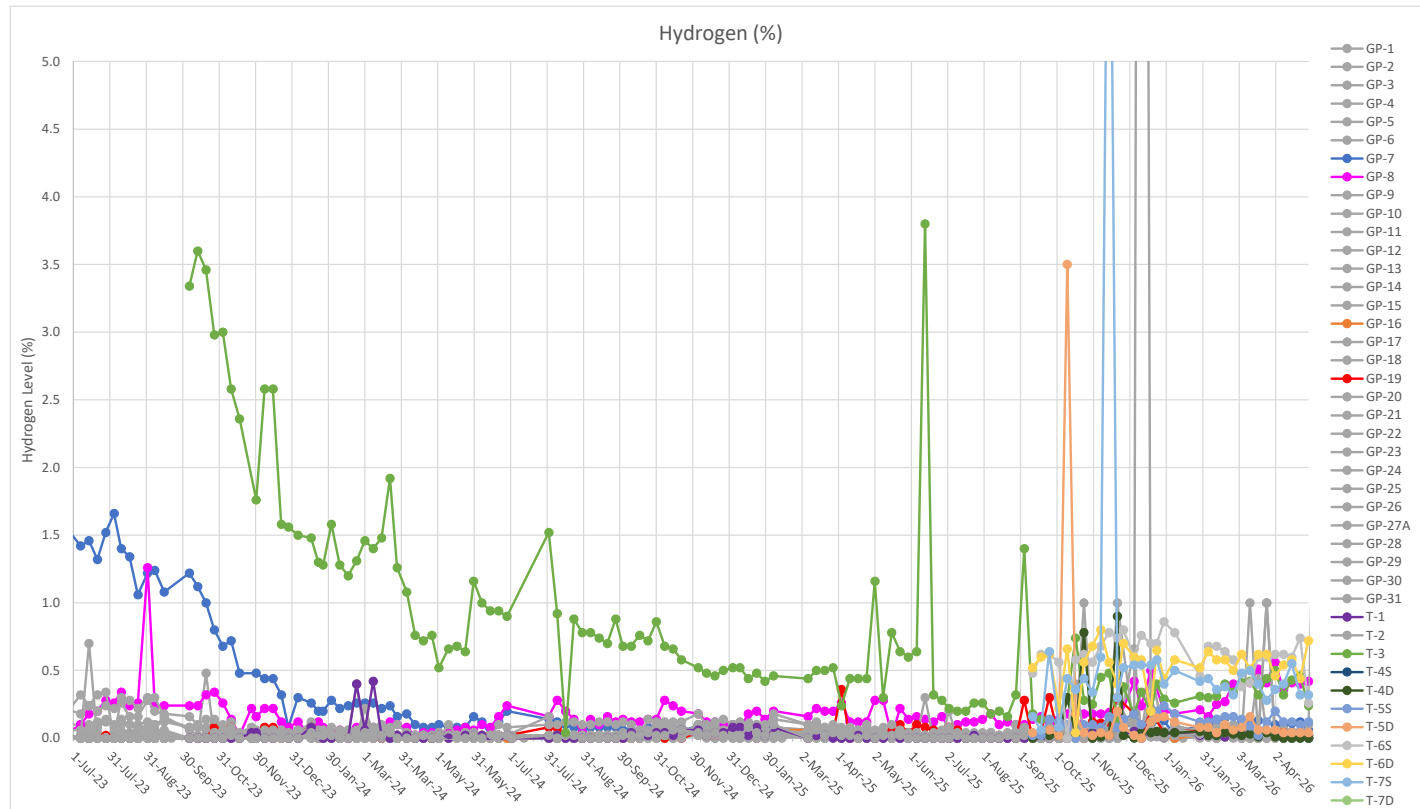


- Data taken from first monitoring event of each month unless noted otherwise
- Data has been interpolated between data points
- Datapoints (probe locations) represented in red
- Temperatures are measured in degrees Fahrenheit
- Ground contours are of existing ground at beginning of project, with design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



Hydrogen

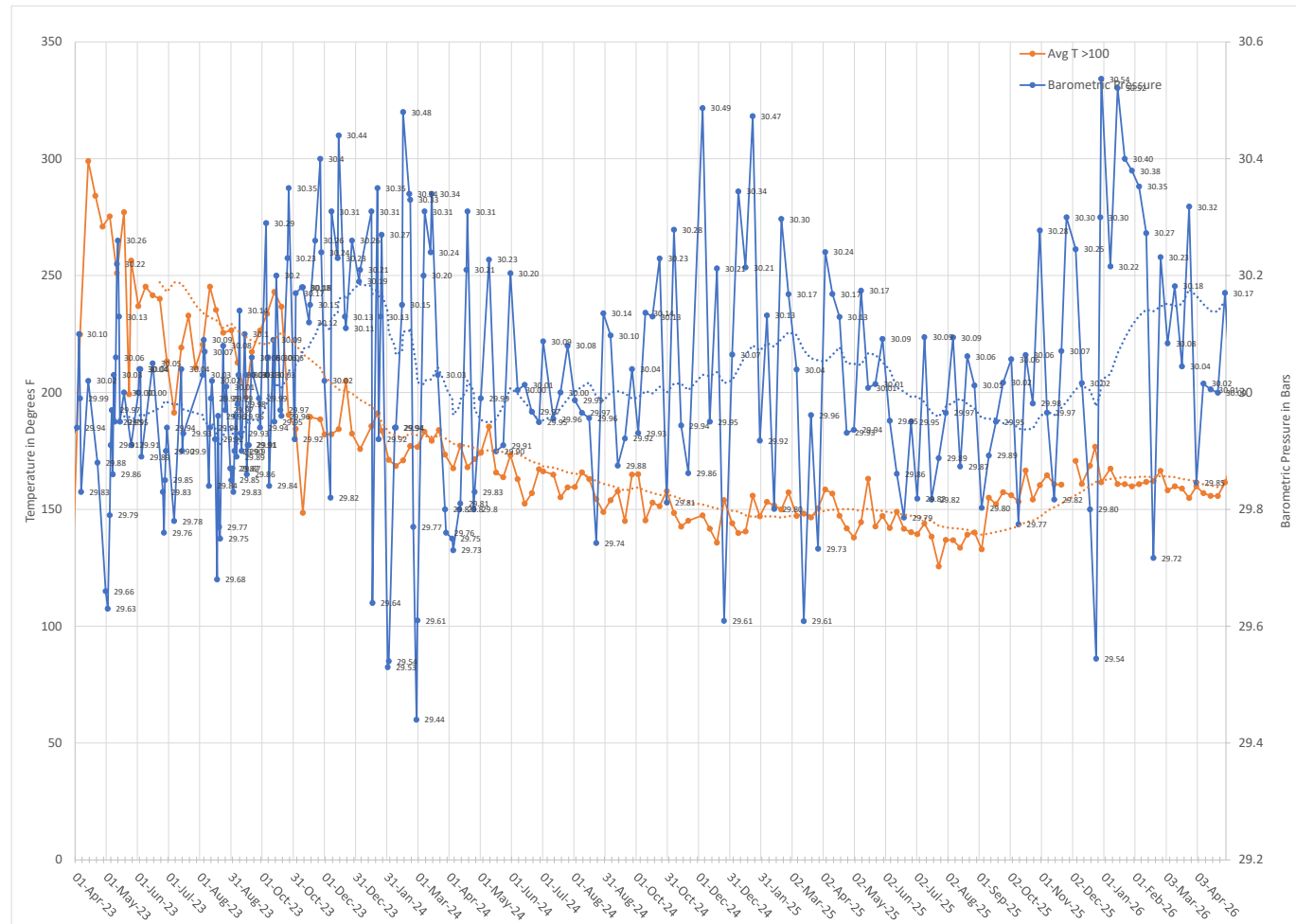
The hydrogen measurements through April have maintained stable trends in the higher reading wells (T-6, GP-8, T-7). Hydrogen remains very low in all other wells. Hydrogen gas is one of the products of smolder activity. The data indicates that a low level smolder continues to be active in the area.



Barometric Pressure

As LFCI expected, the site is continuing to experience higher pressures as the winter season comes to an end. Based on past pressure trends, it is anticipated that this high-pressure environment will begin to decrease through April and May, which may result in less oxygen availability provided there are no major short term pressure swings such as that experienced in late December, 2025.

As the season changes and ground thawing / snowmelt occurs, it will be important to maintain integrity of the soil cover and to address any erosion damage.



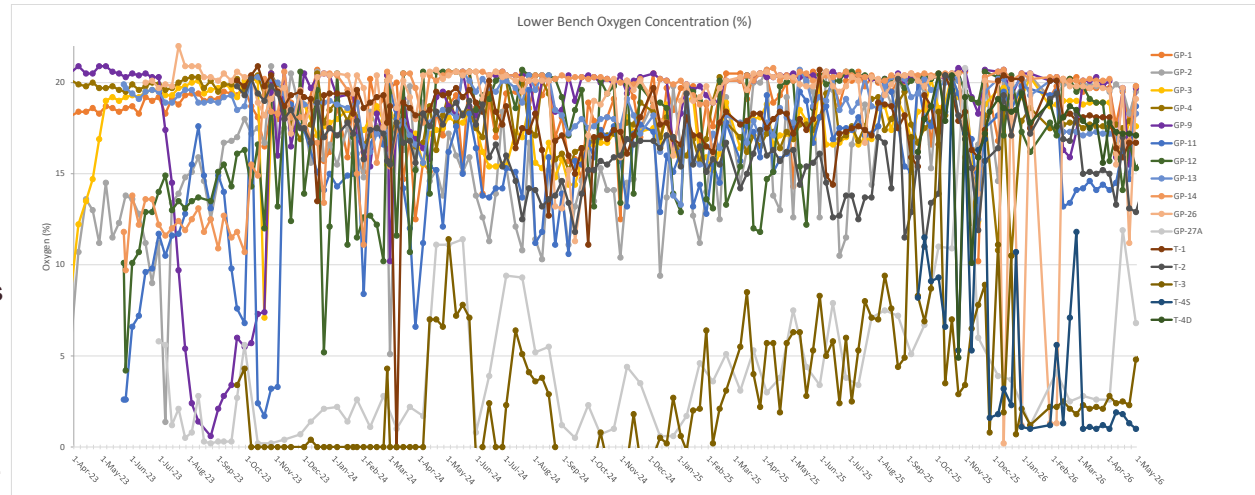
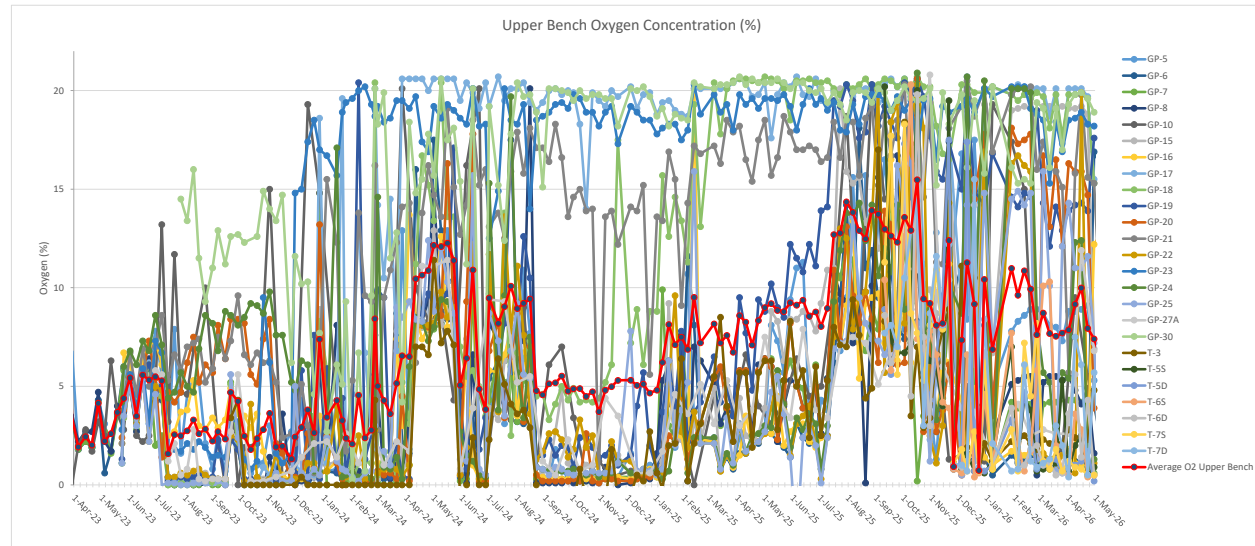
Oxygen

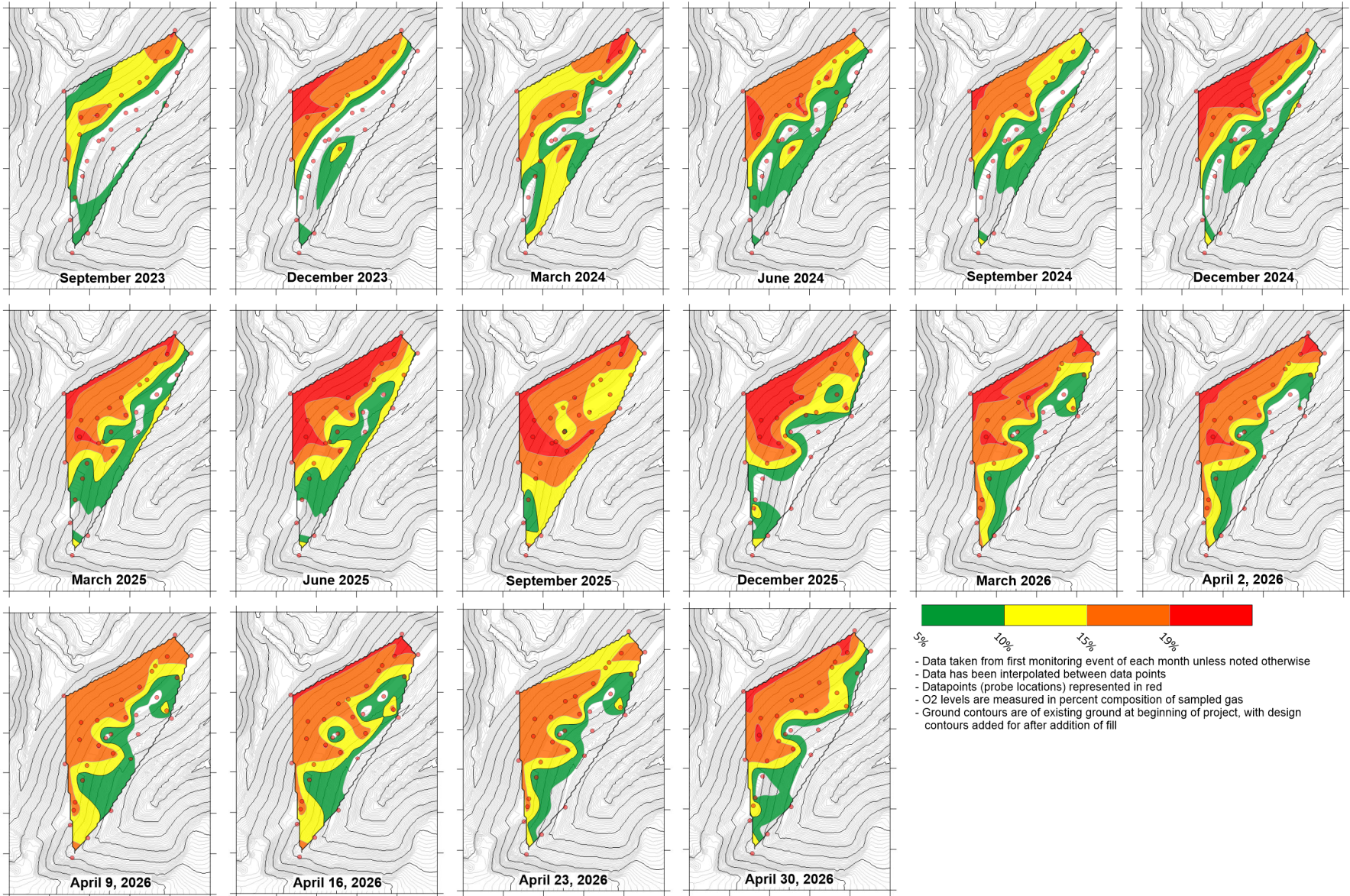
The oldest portion of the landfill is relatively inert and biologically inactive, producing very little methane. As a result, the pore space is full of atmospheric air leading to the generally high oxygen concentrations. The time series plots are difficult to read due to large swings in some of the wells, however in plan view, oxygen levels appear to have been increasing since January of 2025.

The red line with black markers represents average O₂ concentrations in the Upper Bench. Although there is a seasonal oscillation with higher O₂ levels in May through August each year, the general trend has been upward, with winter O₂ levels averaging 3% in winter 2023, 5% in winter 2024, and 10% in winter 2025.

There are two possible explanations for the increasing O₂ levels. One is that the soil cover is becoming desiccated over time, allowing more air entry into the subsurface. The other possibility is that as the smolder is becoming less and less active, oxygen that was previously consumed by smolder activity is no longer being consumed and oxygen levels are slowly increasing because there is very little biological activity within the landfill due to bone dry conditions subsurface and relatively inert C&D waste.

LFCI is of the opinion that at this time, the landfill would benefit from capping of the landfill surface which would completely inhibit oxygen entry during pressure swing cycles.





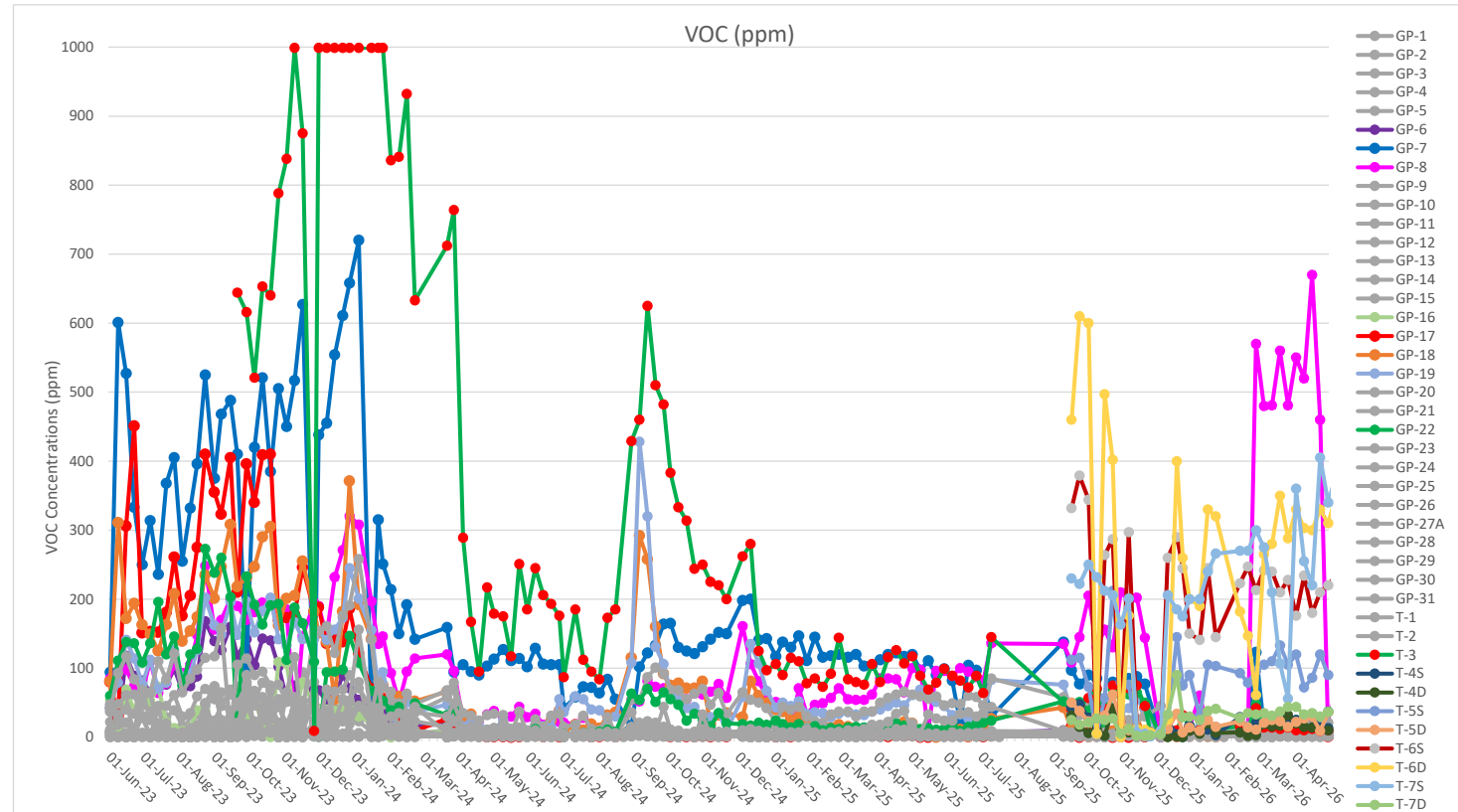
Volatile Organic Compounds

T-6 and T-7 are now the two locations showing the highest VOC levels, with the shallow portion of T-7 and the deep portion of T-6 indicating these levels.

As T-6 and T-7 are deep in the landfill, they are less impacted by dilution effects of atmospheric air cycling in and out of the landfill during pressure swings. Higher VOC concentrations can be expected to some degree.

GP-8 was previously high through March, but over the last two events of April VOC levels in that well have decreased to near zero.

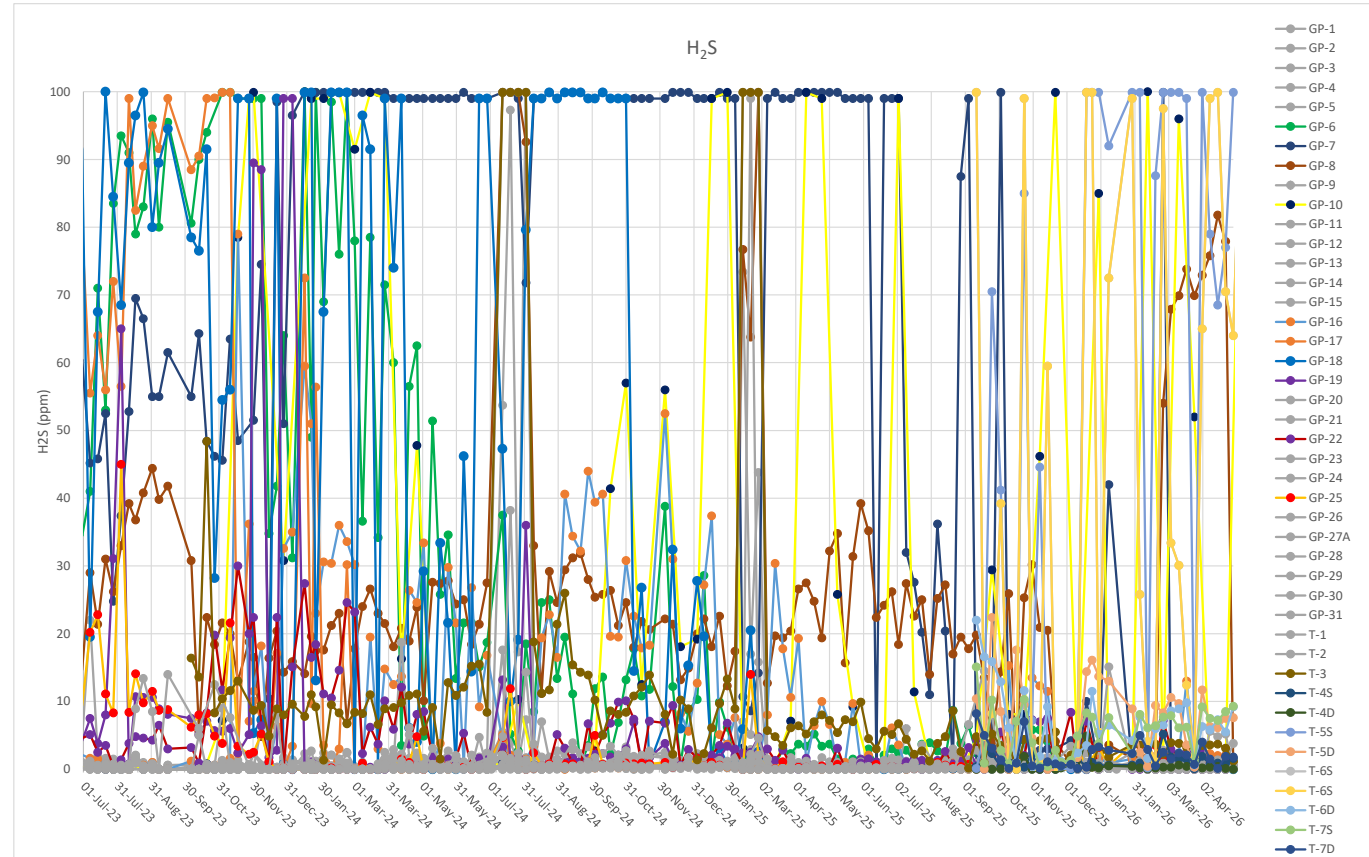
VOC emissions are often related to subsurface landfill fires. The fact that VOC emissions have declined and stayed low for the past several months are a strong indication that the smolder around GP-8 has become less active.



Hydrogen Sulfide

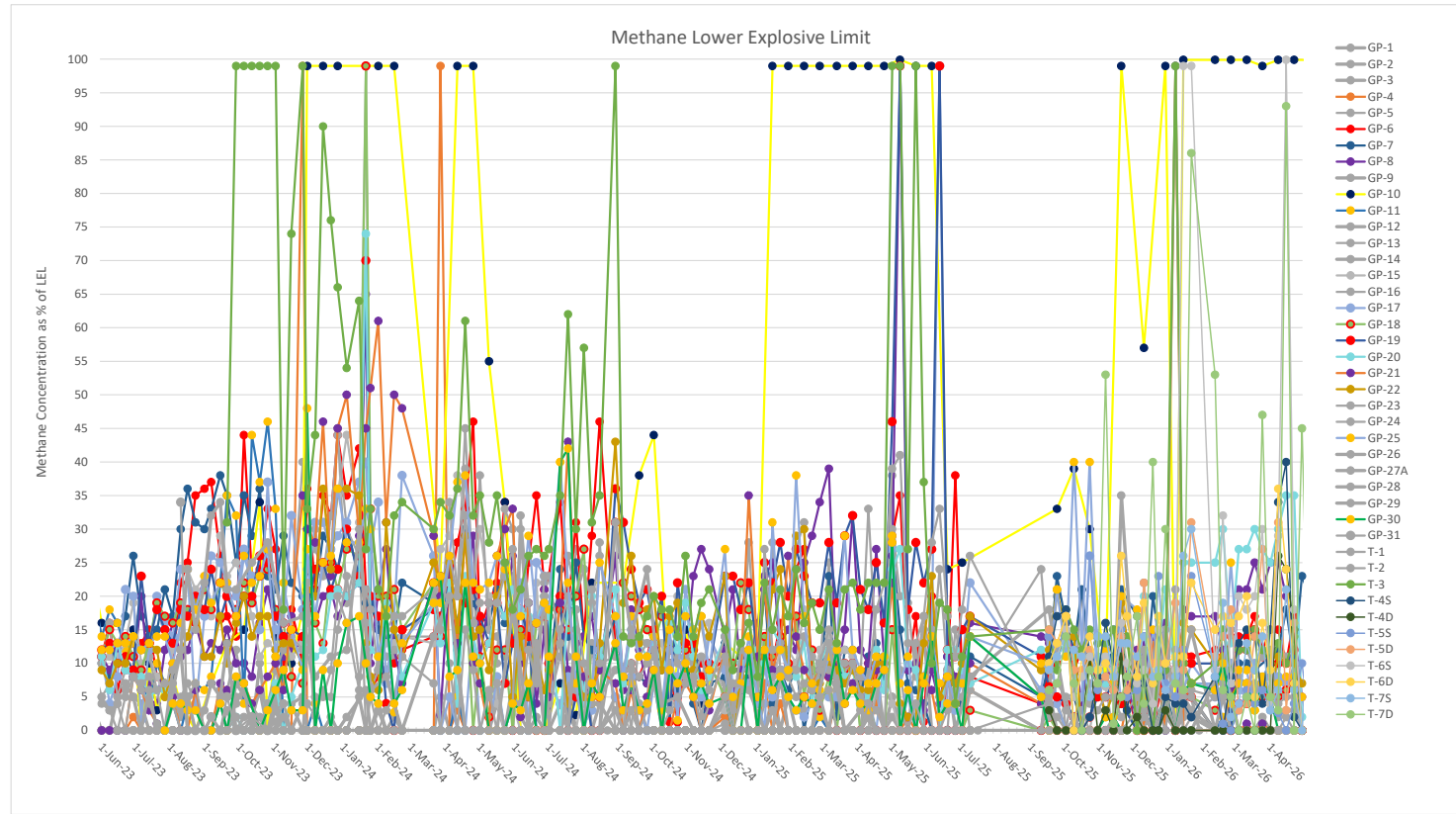
H₂S data continues to be noisy, likely affected by atmospheric pressure fluctuation. Most locations are low, but some locations such as T-5S and T-6S continue to fluctuate wildly. GP-8 has increased significantly in March from close to 0 up to around 80ppm through April.

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.

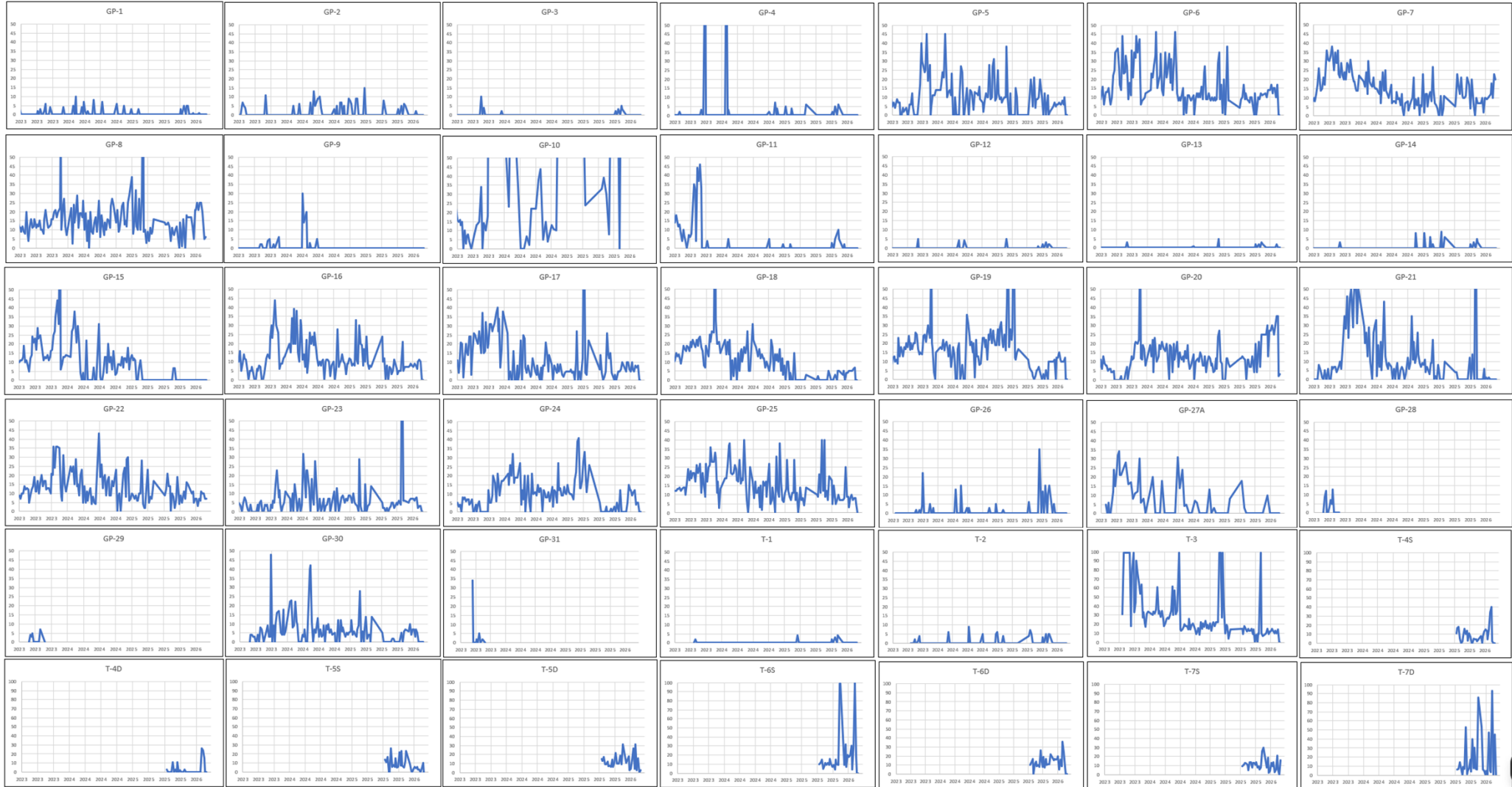


Lower Explosive Limit

Several data points are fluctuating wildly – the direct methane composition is a better indicator of levels within the landfill. Most monitoring points are reporting below 20% of the LEL.

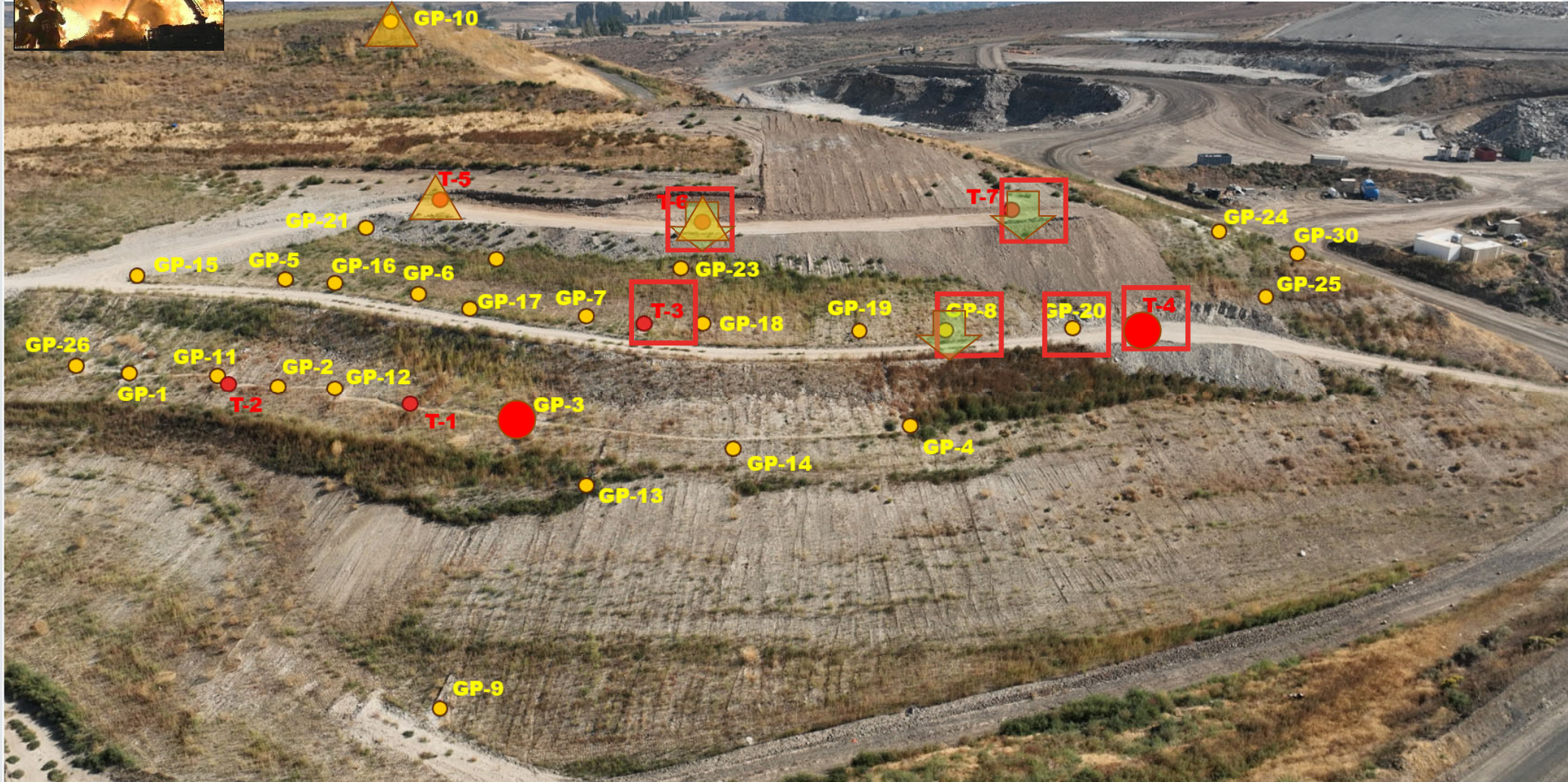


LEL for individual GP

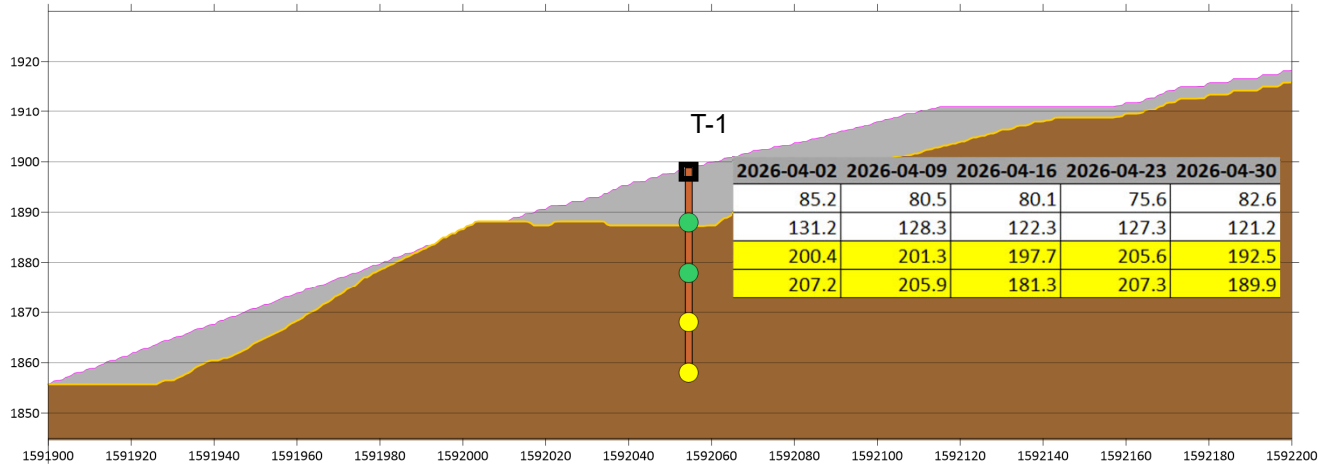




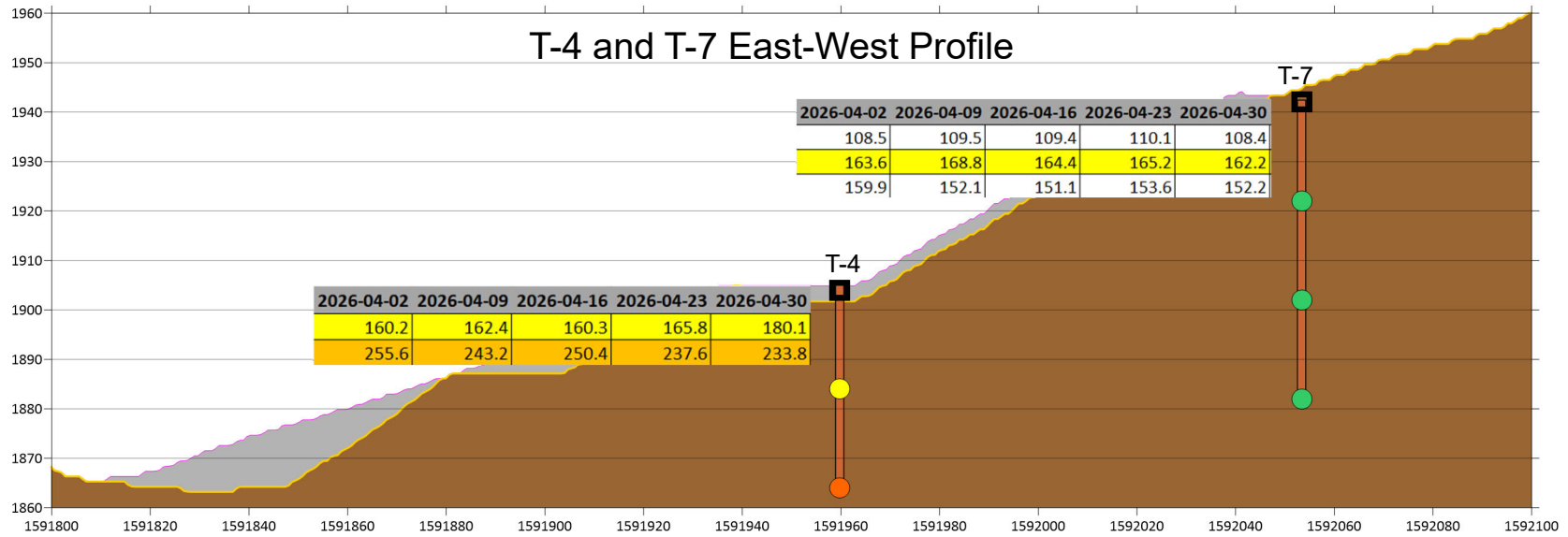
● High Temp (>200) □ High CO ▲ High H2S ▼ High VOC



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 an exponential decay model.

In LFCI's experience, CO has been the best indicator of suppression at other landfill sites and is effective at indicating subsurface smolder activity at this site as well. Currently, the hot spot around T-3 is becoming less active with CO levels that were as high as 9,500 decreasing to 3,000 ppm in that monitor. Drilling of the new monitoring wells in 2025 identified elevated CO levels in T-6 and T-7. LFCI uses a concentration of 1,000 ppm as the primary indicator of active smolder activity. At this time, T-6D, T-7S, T-6S are all elevated above 3,000 ppm and indicating increasing trends over the past month.

Elevated VOC levels in T-6D, T-6S and T-7D is consistent with elevated CO readings, indicating that the smolder is most active in the southern area at this time.

Temperature tracking is indicating that the subsurface is cooling over time and size of the hot spots is consistently shrinking, indicating that the smolder is becoming less active over time.

High O₂ continues to fluctuate seasonally, but appears to be on an increasing trend over time. At this time LFCI is unsure whether the trend in increasing O₂ is due to the soil cover becoming more pervious over time due to dessication cracking, or whether the fact that the major smolder has been effectively suppressed, the rate of oxygen consumption in the subsurface has been decreased, resulting in an increase in O₂ over time.

As atmospheric pressure has been increasing, large ambient pressure swings have been noted, and the cover soil has been inspected and no major concerns were found. Additional cover was placed in the area of T-4 where cover soil was excavated to make room for developing the new wells.

Based on temperature, CO and VOC readings, LFCI believes that the main smolder around T-1 and GP-3 is less and less active, and main smolder activity is now in the southern quadrant around T-4.