

# Shelley Byington

Comments regarding: Chapter 173-408 WAC – Landfill Methane Emissions

As a Yakima County tax paying citizen, I strongly encourage DOE and other agencies to add Limited Purpose Landfills to the same rigors as Municipal Waste Facilities and additional methane/water monitoring. Caton LPL and DTG LPL have brought this dangerous matter to our attention in the last two years with above ground fires and underground fires that persist at both sites to date. Last week's snow fall confirms subsurface thermal activity with snow melt patterns. Caton LPL pictures have been taken. These fires, undoubtedly, contribute to carbon emissions and add to greenhouse environmental impact. It is proven that the LPL's are accepting illegal refuse that contributes to these active fires with their acceptance of organic material. At a minimum, both LPLs should install liners, monitor water, monitor air quality on a rigorous level and report publicly. Also, please add a new WAC for Mandatory Landfill Water Monitoring. It is all of our responsibility to leave future generations a safe environment if we want continued human population sustainability. Currently, Caton and DTG LPLs are SUPERFUND sites in the making. Caton is currently operating ILLEGALLY without permits since 7/1/2023 AND they are not acting on YHD's required compliance items that might bring them into good standing. Catan's blatant disregard for the rule of law leaves all of us scratching our heads, and how/why they are allowed to get away with it. Other Yak County businesses should be upset over this unfair treatment. Catan's ILLEGAL activity has gone unregulated for over SIX months, this should leave persons in paid positions to act, sleepless at night.

Caton's location, and potential impact, to the Naches Resort and its dense population is shocking and should be monitored to avoid water and methane emission impacts. The impact on the Wenas valley is also a concern and its animal and human population. Naches Resort was granted County approval to populate close to 300 lots. Potentially, impacting 600 plus lives with the LPL's activity!

Caton continues to creep further up the hill to avoid dust, noise and other potential daily monitoring by neighbors. Thus, continuing to put them outside of their approved SEPA plan. Again, ILLEGALLY dumping, going unmonitored by YRCAA, Code Enforcement, YHD, and DOE regulators is disturbing and unacceptable with irreversible consequences.

Please, please act as if these LPLs are in your immediate backyard with potential to harm your loved ones!

### Landfill Gas Monitoring

Currently there is no landfill gas (LFG) monitoring requirement for the Caton LPL. The lack of landfill gas monitoring is based on the assumption that production of methane should be “minimal due to the relatively inert nature of the waste stream and the aridity of the site” (2007 Operations and Maintenance Manual). It should be noted that the waste stream includes a number of materials that are not inert such as shrubs, leaves, grass clippings, cardboard, paper, wood, furniture, shredded rubber, and clothing. The recurrence of fire in the waste at this facility also demonstrates that the waste is not inert, and the risk of a subsurface fire is significant. The November 2022 fire event was significant at the facility, see Ecology’s November 18, 2022, letter for more detailed recommendations regarding fire response follow-up.

WAC 173-350-400 requires all limited purpose landfills to be designed to control and monitor explosive gas (typically methane) production, migration, and emissions during active operations as well as during the post-closure period. Landfill gas monitoring is also a required component for consideration of ending post-closure care under WAC 173-350-400(11). The requirements of WAC 173-350 are the minimum functional standards for solid waste facilities of this type, but this site’s history of fires indicates that additional requirements may be necessary to protect human health and the environment. A gas collection system may be needed to characterize emissions of both explosive gases, fire indicator parameters, and hazardous compounds generated in and emanating from the waste. Ecology recommends development of a LFG collection/venting and monitoring plan that includes collection/venting and sampling of gas from the waste, as well as gas sampling from native soil around the perimeter of the waste.

### Financial Assurance