

Wendy Wickersham

Suggestions for WAC 350 and 351

Hi! I live in Yakima County, where two limited purpose landfills are now MTCA sites and I am a neighbor to one of those sites; have ongoing underground fires (and have for years), and keep having issue after issue. Both landfills struggle with accepting waste that is NOT deemed acceptable for a limited purpose landfill. Some examples from Yakima County's LPLs (from health dept and or DOE photos and docs plus newspaper) are accepting 3,000 tons of tires, medical waste, 18 to 30 semi loads of ground up mystery Canadian waste (literally ground to a powder) a working day since 2019, incinerator ash, aluminum plant waste, port o potties, waste that brings in dozens upon dozens of crows and ravens (what construction and demolition waste do they eat?)...the list could go on and on...

My point is that these laws need major revising, clear definitions, clear expectations, shorter timelines for reporting issues (seriously 30 days to report an issue is acceptable?), and major work needs to be done to ensure public safety!

If 100% of LPLs in Yakima County are in MTCA and have underground fires, what issues do LPLs around the state have?

We live in the 21st Century!

- [] Cut time to report issues down to 5 days or less. Make an online reporting system to make it faster.
- [] ERTS is way too overwhelming for the regular person. Redo it. Make it so that an 11 year old could report it. Many magazine and newspaper articles are written at a fifth grade reading level to make them easier for the public to read. People DON'T report when they feel overwhelmed by jargon. It is not made for the public...it should be...the public is frequently the ones reporting issues!
- [] Make an online database log to record loads to an LPL. The person dumping uses a QR code when they pull up to the gate. Complete it. A Camera system snaps a pic of load that goes into database. Approved? Yes, then proceed to dumping area. Record weight in database. Health districts and DOE struggle with monitoring these loads...MAKE IT EASY! Make it so that LPLs are being honest with reporting! This would also help with annual reporting honesty. ADD an ANNUAL WASTE LOG requirement for all LPLs. Add on gas monitoring and air quality to the database as well. It would take some work to set up...then...easy to verify!

A big issue is that these laws are not being easily enforced. Clarify them. Make systems that allow them to be easily monitored at any time...both remote AND in person.

Add a clearer definition on material being in its original form— no ground up waste that is unidentifiable is acceptable at an LPL.

Clearly define construction and demolition materials. There is too much leeway with the current definition. Leaving things up to interpretation is no bueno!

Provide a clear definition of waste acceptable at LPLs. Also provide an unacceptable list. Be specific. Don't leave it up to the landfill to decide...that makes big problems!!

Make it so that LPLs must report all dangerous levels of gases, chemicals, etc THAT DAY—immediately! Finding out days or weeks later DOES NOT protect the public!

Provide clear definitions that benefit the DOE and HD. Clarity is good! I would revamp all definitions that deal with LPLs. LPLs seem to be acting like MSWs...clarify the language!

Provide clear language and definitions on hazardous and chemical wastes not acceptable at an LPL. Hiding things in loads is also no bueno! Provide language on that as well.

Definitions at start—

Be super clear on the LPL definition. What can they take? MAKE SURE THAT IT is in its ORIGINAL FORM...no ground up mystery waste! That mystery waste then leaves a trail for miles on roadways as well after the load is dumped.

Post closure care— define it more clearly. What is functionally stable!

173-350-400 LPLs Applicability

Be clear in that definition. LPLs have possibly been accepting MSW. Fix that. Port o potties, tons of tires, oodles of plastic, etc.

P 139 (c) make it 500 feet from any wetland.

P 140 (e) move landfills active area to within 500 feet of the facility property line.

P 140 (h) how is it determined if a landfill is over a sole source aquifer? Define that.

P 142 (b) landfill gas control

ALL LPLs must be designed to control methane and other explosive gases...require all LPLs to do this! 100% of Yakima County LPLs are on fire and in MTCA.

P 142 (i) All LPLs must require liners 100%. History is telling you.

P 143 (ii) all LPLs need engineered liners. No choice.

P 145 I Define well controlled waste stream. How will it be measured?

II. How will you measure adverse impact to human health? How will you measure the gases off site seeking the lowest point?

P 146 iii. Bottom of the lowest component no less than 50 feet above seasonal high level of groundwater. It maybe should even be more strict.

P 148 d. Yes, to leachate systems in LPLs. Deserts don't mean there's no runoff and leachate.

P 151 I. Define flaring gases . Should LPLs in a high risk fire zone use flaring? How is fire risk lessened?

P 156 Setbacks. Make them minimum 250 feet from property line.

P157 K. Traffic requirements...define. Need 150 feet turnout lane on public road to prevent traffic stopped on roadway. Need turn lane in center as well. Paid for by LPLs starting after 2026.

(I) define controls. A gate on front roadway fence doesn't protect animals and prevent illegal dumping.enforce lockable gate at each entry.

P 159 (I) include gas monitoring

P 161 is "the dept" DOE? Define. Found at bottom of page.

P 162 i. Clear description of solid waste needed.

B dangerous waste—enforce!

G don't allow LPLs to accept tires!

P 163 split up B and make litter, dust, and nuisance odors their own category with clear definitions.

E. Define scavenging.

P 164 how will V be enforced if LPLs are actually accepting if LPLs are accepting more than 50000 cubic yards a year?

Like P 164 A and B! and 165 I and II

P 168 II 500 feet apart is too far

P 170 VI within one calendar day and immediately notify Health district and DOE.

P 172 (ix) annual reports are full of loopholes. Fix that. How it is known that the self reporting is factual? It is the 21st century. Make the operating record online to allow DOE and HD to check daily records as proof of facts.

A. Proof of fire protection. Enforce it.

P 173 B. Enforce it!

P 175 iii. Quantities. How does DOE and HD know that it is honest and factual? Where are the checks and balances?

P 183 (b) add within 2000 feet of the landfill boundary.

P 226 how to enforce closure assurances?

Thank you for the opportunity to provide my input!

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Wenas Valley in Yakima County