



February 27, 2023

John Martin
DTG Limited Purpose Landfill
P.O. Box 14203
Mill Creek, WA 98082

RE: Additional Hydrogeologic Investigative Requirements for DTG Limited Purpose Landfill Permit Renewal and Southern Expansion (YHD Permit: HSW2019-00020).

Dear John Martin,

Since 2021, DTG has indicated that the facility is ready and prepared to expand to a new phase at the DTG Limited Purpose Landfill (LPL). Yakima Health District (YHD) and Washington Department of Ecology (DOE) conducted a facility review which revealed a lack of hydrogeologic data to properly conceptualize and characterize the groundwater flow direction and extent of for the shallow and deep aquifers located beneath the facility's footprint. The review concluded that the hydrogeological data for the facility was insufficient for both the current LPL footprint and the proposed southern expansion.

PREVIOUS PROPOSALS

DTG has submitted two proposed hydrogeologic work plans to YHD and DOE to characterize the groundwater flow under the extent of the LPL footprint and the southern expansion area of approximately 80 acres.

The first proposal, dated January 4, 2023, included only one additional well on the northern boundary of the LPL footprint to be drilled into the deep aquifer. An up-gradient/background well was not proposed, and instead, DTG proposed using an already drilled water supply well, Bertheas '95, as the only background/up-gradient well which would be conformed to compliance standard. This proposal was found to be insufficient by YHD and DOE.

The second proposal, dated February 9, 2023, proposed three additional wells on the northern boundary of the LPL. The well locations proposed were two (a cluster) on the northern boundary for shallow and deep aquifer characterization, and a well on the northeast boundary for deep aquifer characterization. Two other wells were mentioned and included in the proposal; however, these wells will be dependent on the MTCA Agreed Order (AO). YHD will not consider these wells for this proposal as they are not confirmed to be drilled nor address the absence of data in the southern LPL expansion area. An upgradient/background well was not proposed to be drilled, and again, Bertheas '95 was included to act as the only up-gradient or background monitoring well. This proposal was found to be insufficient by YHD and DOE.

ADDITIONAL MONITORING WELLS

The second proposal has included additional wells that will assist in the hydrogeologic investigation at DTG LPL. However, there are still two areas that have no data to support the groundwater flow depictions in this proposal. A well south of the southern expansion area is required to achieve a proper background/up-gradient monitoring well. No data has been collected in the southern expansion area and therefore, the assumptions made on groundwater flow beneath this area are too great. Please propose a new well location south of the southern expansion area to assist in groundwater flow conceptualization and background water quality. YHD highly recommends constructing Bertheas '95 well to a compliance well, as proposed in the February 9, 2023, plan, in addition to a new well to assist in background water quality assessment and groundwater flow characterization.

A well on the northwest boundary of the LPL is required to ensure the groundwater monitoring network encompasses all areas of the facility. Similarly, to the southern area, there is no data on the west property boundary for groundwater besides BH-1 that was abandoned before reaching groundwater. Therefore, the groundwater flow direction on the western boundary is based only on assumption and not data. Please propose a new well location on the western boundary to assist in groundwater flow conceptualization and characterization.

Based upon the data provided following the installation of new monitoring wells, YHD, with technical assistance from DOE, reserves the right to require additional work to ensure this facility is compliant with WAC 173-350-500 and to protect human health and the environment. A limited purpose landfill cannot be approved to operate if there is inadequate groundwater monitoring given the closest neighbor well to waste is 400 feet. YHD must approve a plan to be implemented that justifies and supports expanding the LPL to the South is not a human health or environmental threat.

SUMMARY

At a minimum, the following wells must be installed to support the southern LPL expansion:

- 1) MW-5S per DTG proposal dated February 9, 2023.
- 2) MW-8D per DTG proposal dated February 9, 2023.
- 3) MW-9D per DTG proposal dated February 9, 2023.
- 4) An additional well south of the southern LPL expansion area.
- 5) An additional well on the west boundary of the LPL.

DTG has had ample time and numerous calls to bring forth a plan that meets the requirements of WAC 173-350-500. **If there is not an adequate plan and timeline approved before June 30, 2023, the DTG LPL solid waste permit will not be renewed until the requirements for approval into the southern expansion area are met. Please provide an updated plan and timeline for review that support the installation of the wells stated above within fourteen (14) days of certified receipt of this letter.** YHD highly recommends submitting documents as soon as possible to alleviate timing issues with the permit renewal of the DTG LPL.

Thank you for continuing to work with YHD on these matters to ensure compliance. If you have any questions, please contact steven.newchurch@co.yakima.wa.us or (509) 249-6504.

Sincerely,



Steven Newchurch
Environmental Health Specialist

cc: Washington State Department of Ecology