

GeoEngineers, Inc.

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I reviewed the Agreed Order (AO) No. DE 21624 which is intended to provide for remedial action at the DTG/Anderson limited purpose landfill in Yakima, Washington. After reviewing the Agreed Order, the following comments were submitted to the State Department of Ecology website on behalf of Carole DeGrave and Friends of Rocky Top (FORT).

The sampling completed in December of 2021 and January of 2022, and documented in the February 17, 2022 Freestone Environmental Services report, confirms the existence significant quantities of toxic air pollutants (TAPs) within the Landfill Gas (LFG) at the DTG/Anderson limited purpose landfill. This sampling data was included as a Finding of Fact under Paragraph 5.C of the Agreed Order. Washington Administrative Code (WAC) 173-460-070 requires that new, or modified sources must complete a source impact analysis to demonstrate that the increase in emissions of toxic air pollutants from the new or modified emission units at the source are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.

The results of the source impact analysis must be compared to the acceptable source impact levels provided in WAC 173-460-150. The acceptable source impact levels are much lower than the model toxics control act (MTCA) cleanup levels provided for comparison to the ambient sampling measurements contained in the February 17, 2022 Freestone Environmental Services report and also referenced in Paragraph 5 of the Agreed Order.

New and modified sources that are currently active and operating are held to a higher standard than cleanup activities at contaminated sites. An ambient impact analysis must be completed to ensure that human health and safety is protected from the carcinogenic and toxic effects of the pollutants within the landfill gases. The ambient impact analysis for toxic air pollutants is necessary and required by the regulations.