

September 25, 2024

To: Utilities and Transportation Commission**From:** Friends of Rocky TopReceived
Records Management
Sep 25, 2024**Re:** Comments on Docket Filing TG-240584

Friends of Rocky Top respectfully submits these comments regarding DTG Enterprises, Inc.'s recent application for a G-Certificate from the Utilities and Transportation Commission. Our coalition is comprised of neighbors and other stakeholders impacted by the DTG-Anderson Limited Purpose Landfill, currently under an [agreed order](#) for cleanup under the Model Toxics Control Act. This unlined Limited Purpose Landfill has an ongoing subsurface fire for which DTG is required to submit a workplan to Ecology by October 1, 2024. While the landfill is currently closed, DTG is actively seeking permit approvals to resume operations there within the next two years.

After DTG purchased the landfill in 2019, we witnessed increased truck traffic to the landfill and suspected that residual solid waste was being disposed. Our suspicions were confirmed when Snohomish County issued a Notice of Violation to DTG in 2021 for transporting a container load carrying "less than 10% of recyclable materials" from its Woodinville facility to its Limited Purpose Landfill in Yakima in violation of the County's solid waste flow control ordinance (Superior Court document available [here](#)).

In DTG's G-Certificate application, the company states in response to questions 3 and 4 that "*DTG only seeks a solid waste license for hauling residual materials from our sorting process. We are not seeking a license to transfer solid wastes directly for disposal.*" While our coalition recognizes that DTG is required to obtain a G-Certificate, we urge the UTC to hold the company accountable to this statement by taking the following actions:

- Require DTG to submit a plan outlining how they intend for transportation of solid wastes for disposal to occur.
- Implement a system for monitoring adherence to the plan including regular touchpoints with DTG to ensure compliance.
- Establish a communication channel with Friends of Rocky Top in Yakima and other concerned stakeholders as appropriate to ensure that eyewitness information regarding transportation and disposal of solid waste facilitated by DTG trucks and subcontracts can be swiftly reported and acted upon.

We thank you for the opportunity to submit comments and for your consideration. Please consider our coalition a partner to your agency as you seek compliance on this matter moving forward.

Nancy Lust, Board President, Friends of Rocky Top