# IN THE CIRCUIT COURT OF ST. LOUIS COUNTY STATE OF MISSOURI

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STATE OF MISSOURI ex rel., Attorney General Chris Koster and the Missouri Department of Natural Resources,
Plaintiff,
v.
REPUBLIC SERVICES, INC.,
ALLIED SERVICES, LLC, and
BRIDGETON LANDFILL, LLC, Defendants.

Case No. 13SL-CC01088

#### **STATUS REPORT**

Comes now Bridgeton Landfill, LLC ("Bridgeton Landfill") by and through counsel, and states as follows:

1. On May 13, 2013, an Agreed Order was entered requiring a status report to be submitted on or before June 3, 2013 and the first business day of each month thereafter.

2. The status update must discuss, at a minimum, work on site, compliance with the Agreed Order, and planned activities for the next 30 days.

3. This serves as a status report as required under the Agreed Order.

## **REPORT OF WORK ON SITE**

During September 2015, Bridgeton Landfill conducted the following work on the Site:

4. Routine erosion control and maintenance and ongoing monitoring consistent with facility operations and agreed process;

5. Continuation of operation and maintenance of gas collection and control system;

6. Continuation of upgrades to gas collection and control system as needed;

7. Continuation of operation of leachate pre-treatment plant pursuant to MSD permit;

8. Continuation of dedication of leachate force main to the Bissell treatment facility;

9. Continuation of direct discharge of leachate to MSD's Bissell treatment facility;

10. Continuation of implementation of Odor Management Plan;

11. Continuation of weekly temperature monitoring of neck area Gas Extraction Wells;

12. Continuation of bird management program;

13. Continuation of installation of new grit chamber and lift station in the south east corner of the landfill;

14. Continuation of expanded cooling pilot study, including temperature reporting from new TMPs and submission of additional heat extraction information;

15. Continuation of routine operation and maintenance of gas interceptor wells and temperature monitoring probes;

16. Finalization of low lying area fill project; and

17. Continuation of enhancements to operations in pretreatment facility.

#### **REPORT OF COMPLIANCE WITH AGREED ORDER**

In addition to the work on Site, as outlined above, Bridgeton Landfill conducted the following activities in compliance with the direction of the Agreed Order:

18. The weekly reports required under Section 52.F were submitted on September 4<sup>th</sup>,
11<sup>th</sup>, 18<sup>th</sup>, and 25<sup>th</sup>, and

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19. The monthly report required under Section 52.E was submitted on September 18,2015.

## **REPORT OF PLANNED ACTIVITIES FOR NEXT 30 DAYS**

During the next thirty (30) days, Bridgeton Landfill plans to conduct the following activities at the Site:

- 20. Continue operations of the on-site leachate pre-treatment plant;
- 21. Continue implementation of the Odor Management Plan;
- 22. Continue to enhance gas extraction system;
- 23. Continue implementation of approved expanded heat extraction pilot study; and
- 24. Continue process to dedicate leachate force main to MSD.

# LATHROP & GAGE LLP

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## **ATTORNEYS FOR DEFENDANT**

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above pleading was served via the Court's electronic filing system, on this 1st day of October, 2015, upon the following counsel of record:

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### ATTORNEYS FOR PLAINTIFF

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