



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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OCT 18 2013

Mr. Brian Power
Area Environmental manager
Republic Services, Inc.
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Landfill Gas Corrective Action Plan Update, Bridgeton Landfill, LLC, Permit Number 0118912, St. Louis County

Dear Mr. Power:

This letter is in response to Republic Services, Inc.'s submittal entitled "Bridgeton Landfill - Landfill Gas Corrective Action Plan Update" (LGCAP Update) dated July 26, 2013, submitted to the Missouri Department of Natural Resources' (Department) Solid Waste Management Program (SWMP). The document was submitted pursuant to Section 23 of the First Agreed Order Case No. 13SL-CC01088. The LGCAP Update was prepared by Civil & Environmental Consultants, Inc. and Weaver Boos Consultants. This document provides an update to the November 27, 2012, LGCAP and evaluates the current gas migration status at the landfill, and documents the recently implemented improvements and the ongoing or proposed control measures related to the Subsurface Smoldering Event (SSE). The LGCAP Update requested the following:

- Section 4.0 proposes "to further evaluate the zone of migration of the impacted gas monitoring and temporary monitoring probes with weekly water level readings and monitoring of the impacted probes to better delineate if methane is migrating through deeper zones. It is requested that this evaluation period be extended through the third quarter 2013. At that time a comprehensive corrective action plan will be submitted evaluating the impact of the recently-completed capping, other recent measures, and the proposed measures described above."
- Section 5.0 proposes "that landfill gas corrective summary reports to be incorporated into the quarterly report and submitted by the 15th of each month following a calendar quarter. These reports will summarize all corrective action completed to address methane migration within the prior quarter and, if elevated levels persist, provide a corrective action plan to address the methane exceedances."

The SWMP has reviewed the submittal for compliance with the Missouri Solid Waste Management Law and regulations and hereby approves the requested extended evaluation period of the corrective action control measures and the quarterly corrective actions summary reports as stated above. The following conditions are integral to this approval. Compliance with these conditions shall, in part, determine compliance with Permit Number 0118912.

CONDITIONS:

1. The comprehensive corrective action plan evaluating the recent control measures shall be submitted by November 15, 2013. Although the extension to review the current controls is approved due to the minimal time they have been implemented, the documented SSE related effects such as increased pressure, increased liquid generation, and reduced application of the gas extraction system shall not be sole reasons for future extensions as the event may potentially last for several years. Therefore, Bridgeton shall continue the process to submit, implement, and evaluate additional methane migration corrective actions plans until the facility demonstrates compliance with the Department's methane regulations.
2. Appendix A. Detailed graphs showing methane concentrations for the past three years were not included in the submitted Plan. This information shall be submitted with the comprehensive corrective action plan.

This approval is not to be construed as compliance with any existing federal or state environmental laws other than the Missouri Solid Waste Management Law; nor should this be construed as a waiver for any other regulatory requirements. This approval is not to be construed as compliance with any existing local permitting or zoning ordinances; nor does it supersede any local permitting and/or zoning requirements.

The Department reserves the right to revoke, suspend, or modify this approval and/or Permit Number 0118912 after due notice, if the permit holder fails to maintain the facility in compliance with the Missouri Solid Waste Management Law and regulations, the terms and conditions of the permit, and the approved engineering plans and specifications.

The following document is hereby incorporated into Permit Number 0118912.

DOCUMENT:

A report entitled "Bridgeton Landfill - Landfill Gas Corrective Action Plan Update", dated July 26, 2013, posted to a FTP site on July 26, 2013, regarding the methane migration issues at the Bridgeton Landfill. The report was prepared by Civil & Environmental Consultants, Inc. and Weaver Boos Consultants.

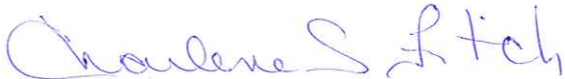
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If any documents requiring seal is submitted using an FTP site, please also provide an original, sealed document sent to the Department at P.O. Box 176, Jefferson City, Missouri 65102-0176.

If you have any questions or comments regarding this letter, please contact me at 573-526-3940 or P.O. Box 176, Jefferson City, Missouri 65102-0176 or at charlene.fitch@dnr.mo.gov.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



Charlene S. Fitch, P.E.
Chief, Engineering Section

CSF:brl

- c: Michael Beaudoin, P.E., Civil & Environmental Consultants, Inc.
- Mr. Joseph Binbeutel, Attorney General's Office
- Mr. Jonathan Garoutte, Department of Health and Senior Services
- Ms. Laura Yates, St. Louis County Department of Health
- Mr. Larry Lehman, Chief, Compliance/Enforcement Section, SWMP
- Ms. Brenda Ardrey, Chief, Operations Section, SWMP
- St. Louis Regional Office via Electronic Shared File