



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

## DEPARTMENT OF NATURAL RESOURCES

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MAY 20 2015

Mr. Brian J. Power  
Bridgeton Landfill  
13570 Saint Charles Rock Road  
Bridgeton, MO 63044

RE: Response to Bridgeton Landfill's May 8, 2015, Letter

Dear Mr. Power:

This is in response to Bridgeton Landfill's May 8, 2015, letter providing additional information related to the requirements set forth in the Department of Natural Resources' May 1, 2015 letter. While your response states plans for compliance with the issues identified in Points 1, 3, and 5-7, the information provided for portions of Points 2 and 4 is inconsistent and incomplete. The remainder of this letter provides the department's plans for moving this process forward to ensure timely completion.

The rationale provided by Bridgeton Landfill for discontinuing the landfill gas (LFG) analytical testing and flow rate measurements (Point 2) is contrary to the rationale for refusing to submit Potential to Emit (PTE) calculations at this time (Point 4). The department agrees additional data, due to the dynamic nature of this landfill, is invaluable for purposes of PTE calculations and air quality modeling. However, as there are ongoing issues of noncompliance and concerns of adverse impacts to public health from emissions, the sooner that PTE calculations and modeling of the best available data is completed, the better.

In Bridgeton Landfill's May 8, 2015 response letter, you point out the sulfur compound concentration and LFG flow rates from the facility vary significantly over time. The department's basis for asserting that the sulfur data set available upon completion of the pilot study will be inadequate for providing a reasonable estimate of potential emissions is due to the variability identified in your May 8, 2015, letter. The variable nature of Bridgeton Landfill's emissions warrants ongoing evaluation to ensure protection of human health and the environment. Continued evaluation of emission rates used to calculate potential emissions and for modeling can then be updated periodically and remain representative of present and future conditions at Bridgeton Landfill. If Bridgeton Landfill wishes to propose an alternate method to monitor emission rates going forward, the department is willing to consider such methods.

Until such time as the department is agreeable that sufficient variable data has been collected, the department is requiring Bridgeton Landfill to continue LFG analytical testing and flow rate measurements beyond the termination date of the pilot studies. Bridgeton Landfill may submit a written request for discontinuation of data collection to the department 180 days from the termination date of the pilot studies. If not approved at that time, Bridgeton Landfill may request such termination every 180 days thereafter, until approved.

Bridgeton Landfill has not agreed and appears unwilling, after several department requests, to provide the calculated PTE. As a result, the department, in coordination with EPA Region VII, has begun the process to calculate Bridgeton Landfill's PTE based upon data submitted by Bridgeton Landfill to this date. You will be provided with the results of this calculation which must be used in the forthcoming modeling analysis. This does not relieve Bridgeton Landfill's responsibility to calculate PTE based upon the best available data as well.

As detailed in prior correspondence, Bridgeton Landfill, following the modification of the facility's construction permits, will be required to incorporate those changes into the Title V operating permit renewal currently being reviewed by the department. In addition, if the results of the air quality impact analysis demonstrate a potential exceedance of the National Ambient Air Quality Standards found in 10 CSR 10-6.010, *Ambient Air Quality Standards*, Bridgeton Landfill will be required to conduct ambient air monitoring pursuant to a department-approved Quality Assurance Project Plan. The department reserves the right to require additional corrective actions to further resolve these deficiencies and any other instances of non-compliance at the Bridgeton Landfill. The department continues to closely coordinate with EPA Region VII on steps needed to ensure compliance with the Clean Air Act.

The requirements of this letter do not resolve the violations documented in previous Notices of Violation issued by the department. The Missouri Air Conservation Law provides for penalties not to exceed \$10,000 per day, per violation. Enforcement actions will be addressed under separate correspondence.

Should you have any questions regarding this correspondence, you may contact me at P.O. Box 176, Jefferson City, MO or by phone at (573) 751-0763.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



Leanne Tippett Mosby  
Division Director

Enclosure

LTM:dbm

c: Mr. James Getting, Bridgeton Landfill  
Ms. Kathrina Donegan, St. Louis County Department of Health  
Mr. Tom Phillips, Missouri Attorney General's Office  
Mr. Aaron Schmidt, Division of Environmental Quality  
Mr. Chris Nagel, Solid Waste Management Program  
Mr. Tom Markowski, St. Louis Regional Office  
Ms. Becky Weber, US EPA Region 7  
Mr. Robert Lambrechts, Lathrop & Gage  
Ms. Ally Cunningham, Lathrop & Gage  
Mr. Bill Beck, Lathrop & Gage  
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