



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

## DEPARTMENT OF NATURAL RESOURCES

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AUG - 1 2014

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

RE: Odor Evaluation Pilot Project Study, Odor Compound Removal Assessment for  
Bridgeton Landfill, Permit Number 0118912, St. Louis County

Dear Mr. Power:

This letter is in response to a submittal titled "Odor Evaluation Pilot Project Study", dated July 24, 2014, hand-delivered to the Missouri Department of Natural Resources' Solid Waste Management Program (SWMP) on July 24, 2014, and information on the filter media system found at the following Internet link: <http://www.mvseer.com/index.php/solutions/odor-filter/index.html> provided by Bridgeton Landfill staff. The pilot project is intended to determine the effectiveness of using MV Technologies (MVT) OdorFilter™ system and filter media for removal of total reduced sulfurs (TRS) from the landfill gas stream at Bridgeton Landfill. The planned test unit will use only a small amount of collected landfill gas, 3 to 25 scfm of landfill gas, to test the removal capabilities of the filter media.

We understand this pilot project is a single component of a more in-depth contract between SCS Engineers and Bridgeton Landfill. This SWMP response is limited to the Odor Evaluation Pilot Project Study. Prior to implementation of any future projects or studies under the overall contract, Bridgeton Landfill will need to submit project work plans for review and approval of those projects by the SWMP.

The SWMP has reviewed the submittal for compliance with the Solid Waste Management Law and regulations and approves the "Odor Evaluation Pilot Project Study" using filter media in the removal of odor causing compounds in the gas at Bridgeton Landfill with the following conditions. Compliance with these conditions shall, in part, determine compliance with Permit Number 0118912.

### CONDITIONS:

1. In the event that odors from the facility increase during the pilot project and are attributable to the flare system as determined by the department, immediate action will be

required of Bridgeton Landfill to mitigate the situation to the satisfaction of the department.

2. Any major change to the "Odor Evaluation Pilot Project Study", such as altering the equipment used, shall be approved by the SWMP in advance of implementing any such change. Minor changes, such as modification or changing of the filter media shall be updated in the final report due no later than 45 days from completion of the pilot project.
3. If the four week time frame for this pilot project is determined to be insufficient to allow for conclusions to be drawn, a formal request for extension of the pilot project shall be made prior to expiration of the original four week period. The original four week period is planned to begin on August 4, 2014. Should the pilot project not begin on August 4, 2014, Bridgeton Landfill shall immediately e-mail the SWMP's Engineering Section Chief notifying her of the new start date for this pilot project.
4. The final report on the pilot project will need to include the findings and lab results from the preliminary sampling and sampling conducted during pilot project implementation. Additionally, the final report will need to include an evaluation of the effectiveness of the TRS removal as well as include the individual MVT summary reports provided to Bridgeton Landfill. The final report is required to have an authorized signature from Bridgeton Landfill conveying the report to the SWMP on behalf of the permitted facility. If our understanding of the pilot project or final report is not correct, please provide clarification.
5. The final pilot project report must contain not only summary data and laboratory analysis related to the final report's findings, but also the pre-pilot sampling data and laboratory analysis used to develop the submitted work plan. All laboratory data and analysis obtained from samplings related to this pilot project must be included in the final report. The narrative of the final report must clearly identify and define evaluation criteria used in determining success or failure of the pilot project.
6. If the pilot project proves successful and should a decision be made to implement a full scale system, Bridgeton Landfill will need to develop and submit for approval a plan for installation of the full scale system prior to beginning installation of such system.
7. SWMP's personnel shall be provided reasonable access to the site to view the pilot project or conduct inspections or investigations, as applicable.

This pilot project 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 pilot project approval is not to

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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 pilot project approval after due notice for failure to maintain compliance with the Missouri Solid Waste Management Law and regulations, or the terms and conditions of this pilot project approval.

The following document is hereby incorporated into Permit Number 0118912:

**DOCUMENT:**

A submittal titled "Odor Evaluation Pilot Project Study" prepared by SCS Engineers dated July 24, 2014, and hand carried to the SWMP on July 24, 2014. This submittal was not signed and sealed by a P.E. licensed in the state of Missouri.

If you have any questions or comments, please contact Mr. J. P. Boessen at (573) 526-3940 or at P.O. Box 176, Jefferson City, MO 65102-0176.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



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

CSF:jbl

- c: Mr. Jim Getting, Bridgeton Landfill  
Ms. Laura Yates, St Louis County Department of Health  
Mr. Larry Lehman, Chief, Compliance/Enforcement Section, SWMP  
Mr. Joe Trunko, St. Louis Regional Office via Electronic Shared File