



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

## DEPARTMENT OF NATURAL RESOURCES

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AUG 05 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 letter is in response to the information provided by Bridgeton Landfill during a meeting with the Department of Natural Resources and the Environmental Protection Agency (EPA) concerning the Bridgeton Landfill's sulfur emissions and related issues such as controls, potential to emit (PTE) calculations, modeling, and air monitoring as discussed during the June 16, 2015, meeting in Jefferson City. The department and EPA still have unresolved questions on some of the issues discussed at the meeting. To move this process forward, please submit the following items for review within **15 days** of receipt of this letter.

1. A copy of the power point presentation presented during the June 16, 2015, meeting.
2. Flow rate information to include, at a minimum:
  - a. Descriptions of the various methods Bridgeton Landfill has used to measure/monitor flow rate (from at least Jan. 2007 through present date), detailed justification for any changes to this process, types of flow meters used including manufacturer and models, location(s) of flow meter(s), calibration frequencies, and any validation or confirmatory testing results on flow rates/velocity, including but not limited to, pitot tube sampling.
  - b. Information on Landfill Gas (LFG) sampling events when flow rate measurements and concentration of sulfur compounds are both analyzed (paired), sampling locations, dates and times, and equipment/method(s) used, including field data.
3. Information to describe how Bridgeton Landfill's LFG testing and PTE calculations take into account operation of all flares, including the utility (aux)

flare on the east side of the landfill. Updated PTE calculations including raw data and methodologies.

4. Information on labs conducting LFG analysis. Explanation of the differences between the results from each lab and a description of the methodologies used by each lab including Quality Assurance procedures, equipment calibrations, etc. Provide an assessment on the quality of data from each lab.
5. Documentation of New Source Performance Standards compliance. Specifically, data justifying Bridgeton Landfill's alternative compliance scenario using hydrogen values and information regarding the ability and any planned usage of assist gas.
6. Air Model inputs files used for the May 29, 2015, report. Include additional documentation/justification or information on the radiative heat loss value of 0.08 and 0.11.

The department continues to closely coordinate with EPA Region 7 to address Clean Air Act compliance. The Department and Region 7 are calculating Bridgeton Landfill's PTE based upon data submitted by Bridgeton Landfill to this date. You will be provided with the results of this calculation.

This will result in required amendments to the submitted air quality impact (modeling) analysis. Bridgeton Landfill must respond to any requests within **15 days**. This does not relieve Bridgeton Landfill's responsibility to calculate PTE based upon the best available data as well.

Also 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 under review. 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 noncompliance at the Bridgeton Landfill.

The requirements of this letter do not resolve the violations documented in previous Notices of Violation issued by the department or undermine deadlines or requirements in other department correspondence. The Missouri Air Conservation Law provides for

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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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