

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

|                                       |   |                       |
|---------------------------------------|---|-----------------------|
| STATE OF MISSOURI ex rel., Attorney   | ) |                       |
| General Chris Koster and the Missouri | ) |                       |
| Department of Natural Resources,      | ) |                       |
|                                       | ) |                       |
| Plaintiff,                            | ) | Case No. 13SL-CC01088 |
|                                       | ) |                       |
| v.                                    | ) |                       |
|                                       | ) |                       |
| REPUBLIC SERVICES, INC.,              | ) |                       |
|                                       | ) |                       |
| ALLIED SERVICES, LLC, and             | ) |                       |
|                                       | ) |                       |
| BRIDGETON LANDFILL, LLC,              | ) |                       |
| Defendants.                           | ) |                       |

**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 April 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 construction of leachate force main to the Bissell treatment facility and inspections;
9. Began direct discharge of leachate to MSD's Bissell treatment facility;
10. Continue installation of an 18-inch header line along the south section of the south quarry;
11. Continuation of implementation of Odor Management Plan;
12. Continuation of weekly temperature monitoring of neck area Gas Extraction Wells;
13. Continuation of bird management program;
14. Continue installation of new grit chamber and lift station in the south east corner of the landfill;
15. Continuation of expanded cooling pilot study, including temperature reporting from new TMPs and submission of additional heat extraction information;
16. Continuation of routine operation and maintenance of gas interceptor wells and temperature monitoring probes; and
17. Began pump replacement project on LCS-2D.

## **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 April 3<sup>rd</sup>, April 10<sup>th</sup>, April 17<sup>th</sup>, and April 24<sup>th</sup>;
19. The Landfill Gas Corrective Action Plan update for 1<sup>st</sup> Quarter 2015 was submitted on April 15, 2015;
20. The reports of the 1<sup>st</sup> Quarter 2015 Odor Control Technology Assessment, Slope Stability Assessment and Quarterly Infrastructure Update was submitted on April 27, 2015; and
21. The monthly report required under Section 52.E was submitted on April 20, 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:

22. Continue operations of the on-site leachate pre-treatment plant;
23. Continue implementation of the Odor Management Plan;
24. Continue installation of 18 inch header line;
25. Continue implementation of approved expanded heat extraction pilot study;
26. Finalize construction of leachate force main to the Bissell treatment facility and inspections;
27. Begin fill project in east low area; and
28. Continue the pump replacement project on LCS-2D.

Dated: May 1, 2015

**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 May, 2015, upon the following counsel of record:

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