

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

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

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OCT 03 2012

CERTIFIED MAIL # 7009 3410 0001 9190 1999
RETURN RECEIPT REQUESTED

Mr. David Vasbinder
Bridgeton Landfill, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Subsurface Smoldering Event, Gas System Expansion, Gas Migration and Odor Control,
Bridgeton Sanitary Landfill, Permit Number 0118912, St. Louis County

Dear Mr. Vasbinder:

This letter is sent in response to a submittal dated August 3, 2012, and received on August 6, 2012, by the Missouri Department of Natural Resources' (Department) Solid Waste Management Program (SWMP). It was submitted by F. Daniel Brennan, P.E. and sealed by Deborah A. English, P.E. of SCS Engineers. This submittal was in response to a comment letter sent to you, dated July 11, 2012, from the SWMP. The submittal contained a response to comments letter and revisions to previous submittal to install additional gas wells to help control odor issues due to the Subsurface Smoldering Event (SSE) and to help reduce the gas migration issue at the landfill.

The SWMP had questions on the submittal. In an email received on September 11, 2012, F. Daniel Brennan, P.E., with SCS Engineers explained the procedures for getting the equipment on the FML lined areas and how the drilling will take place in those areas.

On August 22, 2012, Department staff visited the landfill to observe the conditions and continuing physical changes at the landfill and to discuss the next steps in controlling the SSE.

The SWMP has reviewed this report in accordance with the Missouri Solid Waste Management Law and regulations. The SWMP hereby **approves** this modification to the gas extraction system at the Bridgeton Sanitary Landfill with the following conditions. Compliance with these conditions will, in part, determine compliance with Solid Waste Disposal Area Permit Number 0118912.

CONDITIONS:

1. The SWMP requires the temperatures and depth of each shovel from each well to be recorded as it comes out of the waste and to be submitted with the CQA report.

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2. Smoking, smoldering or hot waste excavated may not be transported to a landfill for disposal until the waste is no longer smoking, smoldering or hot.

DOCUMENTS:

- 1) A bound document titled "Revised Permit Modification Request, Gas System Expansion at Bridgeton Landfill, Bridgeton Landfill, Bridgeton, Missouri", dated August 3, 2012, received by the SWMP on August 6, 2012. The document was submitted by F. Daniel Brennan, P.E. and sealed by Deborah A. English, P.E. of SCS Engineers.
- 2) A response to comments letter addressed to Ms. Charlene S. Fitch, P.E., titled "Response to MDNR Comments Dated July 11, 2012, Proposed Gas System Expansion, Permit No. 0118912, Bridgeton Landfill, Bridgeton, Missouri", dated August 3, 2012, received by the SWMP on August 6, 2012.
- 3) An email received on September 11, 2012 from F. Daniel Brennan, P.E., with SCS Engineers pertaining to the drilling in areas that are covered with FML.

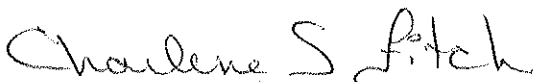
The SWMP understands that there may need to be field modification made while installing this system because of site conditions and location of the SSE. Please contact the SWMP before any major modification is made to this plan.

The Department appreciates the commitment of resources provided by Bridgeton Landfill, L.L.C. and its contractors.

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

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



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

CSF:jbm

- c: John Haasis, P.E., St. Louis County Department of Health
Mr. Tim Duggan, Attorney General's Office
Mr. Brandon Doster, Hazardous Waste Program
Mr. Joe Trunko, St. Louis Regional Office