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

| STATE OF MISSOURI ex rel.                 | )           |                          |
|---|-------------|--------------------------|
| Attorney General Joshua Hawley and        | )           |                          |
| Missouri Department of Natural Resources, | )           |                          |
| Plaintiff,<br>v.                          | )<br>)<br>) | Case No. 13SL-CC01088-01 |
| REPUBLIC SERVICES, INC., et al.           | )           |                          |
| 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 by the Circuit Court of St. Louis County, Missouri 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 June 2017, Bridgeton Landfill conducted the following work on the Site:

- 4. Continued routine erosion control and maintenance and ongoing monitoring consistent with facility operations and agreed process;
  - 5. Continued operation and maintenance of gas collection and control system;
  - 6. Continued upgrades to gas collection and control system as needed;
- 7. Continued routine operation and maintenance of gas interceptor wells and temperature monitoring probes;

- 8. Continued operation of leachate pre-treatment plant pursuant to Metropolitan Sewer District ("MSD") permit;
- 9. Continued direct discharge of permeate to MSD's Bissell Point treatment facility or other approved disposal facilities as determined by MSD;
- 10. Continued enhancements to operational efficiency of leachate pretreatment facility;
  - 11. Continued implementation of Odor Management Plan;
  - 12. Continued weekly temperature monitoring of neck area Gas Extraction Wells;
  - 13. Continued bird management program;
- 14. Continued operation of the expanded cooling pilot study, including temperature reporting from temperature monitoring probes ("TMPs");
- 15. Continued installation of EVOH liner for Phase 1A and 1B capping project in North Quarry; and
  - 16. Conducted maintenance work on LCS-1D and LCS-3D pumps and transducers.

## 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:

- 17. The weekly reports required under Section 52.F were submitted on June 2, 9, 16, 23, and 30, 2017 and
  - 18. The monthly report required under Section 52.E was submitted on June 20, 2017.

## 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:

- 19. Continue operations of the on-site leachate pre-treatment plant;
- 20. Continue to complete enhancements to on-site leachate pre-treatment plant;
- 21. Continue implementation of the Odor Management Plan;
- 22. Continue to enhance, operate, and maintain gas extraction system;
- 23. Continue implementation of approved expanded heat extraction pilot study;
- 24. Continue process to dedicate leachate force main to MSD;
- 25. Continue TMP monitoring in the North Quarry;
- 26. Continue bird management program;
- 27. Continue enhancements to the North Quarry Cap, including continued implementation of Phases 1A and 1B capping project; and
  - 28. Conduct maintenance on low fill areas.

## Respectfully Submitted,

#### LATHROP & GAGE LLP

By: /s/ Peter F. Daniel

William G. Beck MO #26849 Peter Daniel MO #33798

Allyson E. Cunningham MO #64802

2345 Grand Blvd., Ste. 2200 Kansas City, MO 64108-2618 Telephone: (816) 292-2000 Telecopier: (816) 292-2001 wbeck@lathropgage.com pdaniel@lathropgage.com

acunningham@lathropgage.com

Patricia L. Silva MO #67213 Pierre Laclede Center 7701 Forsyth Blvd., Ste. 500 Clayton, MO 63105

Telephone: (314) 613-2800 Telecopier: (314) 613-2801 psilva@lathropgage.com

ATTORNEYS FOR DEFENDANTS

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of June, 2017 the foregoing was filed via the Missouri Court's eFiling system, which will automatically serve an electronic copy upon the following counsel of record. In addition, the undersigned certifies that he signed the original of the foregoing and will maintain it in compliance with Rule 55.03.

Joshua D. Hawley
Attorney General, State of Missouri
Laura Elsbury
laura.elsbury@ago.mo.gov
Emily Ottenson
emily.ottenson@ago.mo.gov
Joel Reschly
joel.reschly@ago.mo.gov
Cara C. Stuckel
cara.stuckel@ago.mo.gov
Michael D. Quinlan
michael.quinlan@ago.mo.gov
P.O. Box 899
Jefferson City, MO 65102

ATTORNEYS FOR PLAINTIFF

/s/ Peter F. Daniel
An Attorney for Defendants