

**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,)	
v.)	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 January 2018, 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. Conducted maintenance on low fill areas and continued the East Fill Project; and,
16. Continued construction of the first responders’ entrance.

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 January 5, 12, 19, and 26, 2018; and
18. The monthly report required under Section 52.E was submitted on January 20, 2018.

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. Conduct maintenance on low fill areas and continue 2017 East Fill Project;
28. Conducted maintenance on LCS-1D; and
29. Complete construction of the first responders' entrance, dependent on weather conditions and contractor availability.

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 31st day of January, 2018 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
Ryan L. Bangert
ryan.bangert@ago.mo.gov
Ricardo M. Dixon
ricardo.dixon@ago.mo.gov
Laura Elsbury
laura.elsbury@ago.mo.gov
Courtney Lauer
courtney.lauer@ago.mo.gov
Joel Reschly
joel.reschly@ago.mo.gov
Cara C. Stuckel
cara.stuckel@ago.mo.gov
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-4526

ATTORNEYS FOR PLAINTIFF

/s/ Peter F. Daniel
An Attorney for Defendants