



November 15, 2020

Mr. Christopher Nagel
Director, Solid Waste Management Program
Missouri Department of Natural Resources
1730 East Elm Street
Jefferson City, Missouri 65101

RE: Bridgeton Landfill
Quarterly VOC Air Monitoring Program

Dear Mr. Nagel;

Enclosed please find copies of the most recent report describing sampling activities and analytical results of the volatile organic compound (VOC) monitoring program at Bridgeton Landfill. The monitoring period covered by the report extends from July 1, 2020 to September 24, 2020 and encompasses six (6) bi-weekly sample collection/submittal/analysis events.

This report represents the fourth quarterly VOC monitoring report developed for the program, which was implemented in September 2019 in accordance with Paragraph 31.a of the facility's June 2018 Final Consent Judgment. This report also provides a brief summary of program activities undertaken during, and data received following, twenty-eight (28) bi-weekly sampling events performed over the preceding 13-month period. The results of VOC analyses performed on samples collected since May 2015 were used to develop time-series charts included in the enclosed report.

After review of both the quarterly analytical results and the annual data summary included in the enclosed report, the facility formally requests that the VOC air monitoring program at Bridgeton Landfill be terminated effective September 24, 2020. Bridgeton Landfill, LLC believes that the following information supports the request:

- The maximum concentrations of the six (6) VOCs detected in both the off-site air monitoring stations in 2014/2015 and the on-site stations decreased in the latter by an average of 41.6% since September 2019. The six VOC's include Benzene, Ethyl Benzene, m,p-Xylene, o-Xylene, Toluene, and Tetrachloroethene.
- For the on-site stations, the maximum concentration detected for each of the six VOC's during analyses of the September 24, 2020 samples was less than or equal to the

maximum concentration reported during the United States Environmental Protection Agency's (USEPA's) off-site program (samples collected in 2014/2015).

- Tracking of VOC detections in bi-weekly analyses performed since May 2015 indicates that seasonal effects may impact the absorption efficiency of the Radiello® samplers, i.e. precipitation/humidity, ambient temperature, wind speed and direction, etc. These factors, in combination with the transient nature of passive air sampling at a heavily trafficked facility, likely render data trend evaluations inapplicable and the design of remedies to address any short-lived action level exceedance impracticable.
- On August 15, 2019, USEPA approved a request to remove the VOC monitoring requirement from the air monitoring sampling and analysis plan developed for Operable Unit 1 of West Lake Landfill, located within the Bridgeton Landfill property. Paragraph 31.a of the June 2018 Final Consent Judgment requires that VOC sampling and analyses at Bridgeton Landfill be conducted pursuant to the same program/plan that governs such activities at West Lake Landfill. Logic would dictate that since USEPA approved the cessation of VOC sampling and analyses at West Lake Landfill, cessation of such activities at Bridgeton Landfill should follow suit.
- Therefore, in light of USEPA's decision to terminate VOC sampling and analysis at West Lake Landfill and in recognition of statements made during a July 17, 2020 conference call, attended by representatives of Bridgeton Landfill and your office, during which Missouri Department of Natural Resources expressed receptiveness to ending VOC monitoring at Bridgeton Landfill, Bridgeton Landfill, LLC is respectfully submitting the noted request.

Bridgeton Landfill, LLC and Feezor Engineering, Inc. appreciate your consideration of the described request. If you have any questions regarding the request or the enclosed report, please contact the undersigned at your convenience.

Sincerely,

Daniel R Feezor

Daniel R. Feezor, P.E.

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Enclosure: Fourth Quarterly VOC Monitoring Report / Annual Summary - Bridgeton Landfill