



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

DEPARTMENT OF NATURAL RESOURCES

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APR 23 2013

Mr. Craig Almanza
Area Environmental Manager
Republic Services, Inc.
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Leachate Tank and Transport Disposal Modification, Bridgeton Landfill, Permit Number 0118912, St. Louis County

Dear Mr. Almanza:

This letter is sent in response to a submittal titled "Bridgeton Landfill Leachate Tank and Transport Disposal", dated March 28, 2013, to the Missouri Department of Natural Resources' (Department) Solid Waste Management Program (SWMP), and received on April 2, 2013. The submittal was in response to Condition 1 of the SWMP's March 20, 2013, approval letter for only the construction of the tank and was sealed by Kevin T. Kamp, P.E., Senior Project Manager, Civil and Environmental Consultants, Inc. (CEC). It included additional details to the previously submitted report received via email on March 7, 2013, an updated set of Weaver Boos drawings revised March 13, 2013, supplemental specifications, and new set of drawings by CEC dated February 2013 specifying additional road, grading, secondary containment, and drainage details for the tank site.

The SWMP's review of this document has been coordinated with the Saint Louis County Department of Health's (SLCDH) Solid Waste Management Program and includes their comments.

While reviewing this submittal, the SWMP observed that the March 5, 2013, response to comments were slightly modified, in addition to unapproved/unrequested revisions to the Weaver Boos Drawings in Attachment B since the March 20, 2013, approval letter was issued with conditions. Please note that any revisions made to previously approved/reviewed plans should be documented in a narrative detailing what has been revised and why.

The SWMP has reviewed the March 28, 2013, submittal and has determined that the submittal, excluding Attachment D, meets Condition 1 of the March 20, 2013, approval letter.

An additional email submittal, dated and received by the SWMP on April 17, 2013, titled "Leachate Tank and Transport Disposal, CEC Project 130-484", was included in this review.

The submittal consisted of four pages of narrative and two flow charts and was submitted on your behalf by Kevin T. Kamp, P.E. Senior Project Manager, CEC.

The SWMP has reviewed the April 17, 2013, submittal and accepts it as supplemental information to the March 28, 2013, submittal.

The SWMP has reviewed the submittals for compliance with the Solid Waste Management Law and regulations and approves them with the following conditions. Compliance with these conditions shall, in part, determine compliance with Permit Number 0118912:

CONDITIONS:

1. This approval is the SWMP's approval for the tank to be used for storage, aeration and load out only but **does not** allow you to begin using the tank for this until the Department's Hazardous Waste Program (HWP) reviews the results of the leachate characterization study and issues an approval for the design and operation of this tank prior to using it for storage, aeration and load out. Approval from the SWMP does not negate this.
2. Please review the enclosed comments in Attachment A from the SWMP and SLCDH and resubmit as supplemental information to be included in our files. Please submit a response within 45 days of receipt of this letter.
3. This submittal contained information **ONLY** for the storage, aeration and load out of leachate. The SWMP has yet to receive a Leachate Management Plan (LMP). The LMP should consist of a comprehensive management and operations plan (plan) for the entire leachate collection and disposal system. It should conceptually describe how the plan will work and solve the problems with the amounts and contamination of the leachate (the enclosed Attachment B contains the minimum information to be included in the LMP). As previously mentioned in past communications, the plan shall be a narrative which contains sufficient detail that an independent third party could pick up the plan and implement it. Please submit a LMP within 45 days of receipt of this letter.

The following documents are hereby incorporated into Permit Number 0118912:

DOCUMENTS:

1. A letter and report titled "Bridgeton Landfill Leachate Tank and Transport Disposal" dated March 28, 2013, received April 2, 2013, sealed by Kevin T. Kamp, P.E., Senior Project Manager, CEC, and submitted to Charlene Fitch, P.E., Solid Waste Management Program. The report is approved through Attachment C, and includes a set of plan sheets entitled "Bridgeton Landfill Leachate Storage Tank & Load out Construction Plans" dated February 17, 2013, with revisions dated March 4, 2013, and March 13, 2013, received April 2, 2013, signed and sealed by John Bossert, P.E. of Weaver Boos Consultants.

2. A supplemental email letter and two flow charts titled "Bridgeton Landfill Leachate Tank and Transport Disposal, CEC Project 130-484", dated and received by the SWMP on April 17, 2013. The submittal consisted of four pages of narrative and two flow charts, submitted by Kevin T. Kamp, P.E. Senior Project Manager, CEC.

This approval is not to be construed as compliance with any existing federal or state environmental laws other than the Missouri Solid Waste Management Law; nor should this be construed as a waiver for any other regulatory requirements. This approval is not to be construed as compliance with any existing local permitting or zoning ordinances; nor does it supersede any local permitting and/or zoning requirements.

The Department reserves the right to revoke, suspend, or modify this approval and/or Permit Number 0118912 after due notice for failure to maintain compliance with the Missouri Solid Waste Management Law and regulations, the terms and conditions of the permit and approved engineering plans and specifications.

If you have any questions or comments, please contact Mr. Brian Roth-Roffy or Mr. J. P. Boessen, of my staff at (573) 526-3940 or at P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



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

CSF:jbl

Enclosures

- c: Kevin T. Kamp, P.E., Senior Project Manager, Civil and Environmental Consultants, Inc.
Ms. Laura Yates, St Louis County Department of Health
Mr. Larry Lehman, Chief, Compliance/Enforcement Section, SWMP
Mr. Joe Trunko, St. Louis Regional Office
Mr. Rich Nussbaum, HWP