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

STATE OF MISSOURI ex rel., Attorney	)
General Chris Koster and the Missouri	)
Department of Natural Resources,	)
Plaintiff,	) Case No. 13SL-CC01088
V.	)
	)
REPUBLIC SERVICES, INC.,	)
ALLIED SERVICES, LLC, and	)
BRIDGETON LANDFILL, LLC,	)
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 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 2015, Bridgeton Landfill conducted the following Work on the Site:

- 4. Routine erosion control and maintenance and ongoing monitoring consistent with facility operations and agreed process;
  - 5. Continuation of operation and maintenance of gas collection and control system;

- 6. Continuation of upgrades to gas collection and control system as needed;
- 7. Continuation of operation of leachate pre-treatment plant pursuant to MSD permit;
  - 8. Continuation of construction of leachate force main;
- 9. Begin installation of an 18-inch header line along the south section of the south quarry;
- 10. Completion of construction of additional and replacement gas extraction wells in the South Quarry in accordance with plans submitted to MDNR;
  - 11. Continuation of implementation of Odor Management Plan;
- 12. Continuation of work to lower gas extraction wells and lowering of leachate riser LCS-4;
- 13. Continuation of weekly temperature monitoring of neck area Gas Extraction Wells;
- 14. Installation of new grit chamber and lift station in the south east corner of the landfill;
- 15. Continuation of expanded cooling pilot study, including temperature reporting from new TMPs and submission of additional heat extraction information;
- 16. Continuation of routine operation and maintenance of gas interceptor wells and temperature monitoring probes;
  - 17. Installation of 9 TMPs in North Quarry; and
- 18. Initiation of second Comprehensive Air Monitoring Event under the terms of the Second Amendment to the First Agreed Order and submission of report of July 2014 Comprehensive Air Monitoring Event.

## 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:

- 19. The weekly reports required under Section 52.F were submitted on January 4<sup>th</sup>, January 9<sup>th</sup>, January 16<sup>th</sup>, January 23<sup>rd</sup>, and January 30<sup>th</sup>;
- 20. The Landfill Gas Corrective Action Plan update for 4<sup>th</sup> Quarter 2015 was submitted on January 15, 2015;
- 21. The reports of the 4<sup>th</sup> Quarter 2014 Odor Control Technology Assessment, Slope Stability Assessment and Quarterly Infrastructure Update were submitted on January 30, 2015;
- 22. The monthly report required under Section 52.E was submitted on January 20, 2015.

# 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:

- 23. Continue operations of the on-site leachate pre-treatment plant;
- 24. Continue implementation of the Odor Management Plan;
- 25. Continue work to lower gas extraction wells;
- 26. Continue construction on the leachate force main; and
- 27. Continue implementation of approved expanded heat extraction pilot study.

# Dated: February 2, 2015 LATHROP & GAGE LLP

By: /s/ Matthew A. Jacober

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#### ATTORNEYS FOR DEFENDANT

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above pleading was served via first class United States mail, postage prepaid, on this 2nd day of February, 2015, upon the following counsel of record:

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