



June 5, 2015

Ms. Charlene Fitch, P.E.  
Chief, Engineering Section  
Solid Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102

Ms. Laura Yates  
Field Services Supervisor  
Solid Waste Management Program  
St. Louis County Department of Health  
4562 Lemay Ferry Rd, St. Louis 63129

Re: Clean Fill Permit Modification  
Bridgeton Landfill Solid Waste Permit 118912  
St. Louis County Operating Permit 0418

Dear Ms. Fitch and Ms. Yates:

Weaver Consultants Group (WCG) has been contracted by Bridgeton Landfill, LLC. (Bridgeton Landfill) to submit a permit modification to Solid Waste Permit 118912 and County Permit 0418 for use of clean fill materials for placement within settlement areas at the Bridgeton Landfill as structural fill. This permit modification also includes a variance from the St. Louis County clean fill requirements regarding painted materials.

Need:

Accelerated settlement has occurred in the South Quarry area of the closed landfill due to the subsurface smoldering event. This settlement has created low areas which collect surface water and cause "bellies" in gas and air lines reducing or obstruction flow. Bridgeton Landfill proposes to stabilize the settled areas, similar to the September 2014 report titled, "Work Plan 2014 Soil Filling in South Quarry, Bridgeton Landfill", prepared by Civil & Environmental Consultants, Inc. to improve drainage however with clean fill overlain with soil.

Missouri Solid Waste Regulation 10 CSR 80-2.010(11) defines clean fill as follows: uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblocks, brick, minimal amounts of wood and metal, and inert solids as approved by rule or policy of the department for fill, reclamation or other beneficial use. Use of clean fill or reclamation is exempt from permitting activities in accordance with 10 CSR 80-2.020(9) provided that pollution, a public nuisance or a health hazard is not created. Since the area to receive the clean fill is an inactive sanitary landfill, this letter is being submitted to request a permit modification for the placement of additional clean fill over the disposal unit permitted under Solid Waste Permit 118912 and County Permit 0418.

Acceptance Procedures

The acceptance procedures for clean fill will be similar to the procedures carried out at the transfer station. Access to the facility will be limited to the times of operations of the transfer station and when personnel are on-site to direct and observe unloading of clean fill. The entrance/exit for the transfer station is gained via St. Charles Rock Road.

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Each load of clean fill will pass by the scale house prior to proceeding to the landfill or designated clean fill area. Vehicles will be weighed prior to unloading the clean fill. The facility will utilize stored tare weights or weigh the empty vehicle, if necessary.

Incoming clean fill will be inspected both at the scales and at the time of unloading. A responsible attendant will be on duty at all times when receiving clean fill to assure that only clean fill materials are received. Unacceptable materials will be removed by the person delivering the waste. If a hauler has left the site prior to the discovery of an unacceptable waste, the waste will be placed in a storage container and disposed of appropriately.

Bridgeton Landfill will only be accepting clean fill for placement within settlement areas in the cover system. In accordance with 10 CSR 80-2.080(1)(A)1, clean fill used as soil cover at the landfill is not subject to the solid waste tonnage fee.

#### Placement Procedures

The driver will be directed to the clean fill filling area or stockpile area. Unloading will be supervised by Bridgeton Landfill staff or delegated personnel. Similar to the 2014 CEC report referenced above, Bridgeton Landfill will minimize potential odor occurring during the construction process by leaving the existing EVOH cap in place and placing clean fill directly upon it. Low areas within the EVOH cap will be perforated with heavy equipment just prior to clean fill placement. As an alternative, a sump may be installed to remove any collected liquids from low lying areas. During these activities, the "Odor Management Plan" dated June 20, 2014 or most recently approved version will be employed to mitigate odors.

The clean fill will be placed in a controlled manner so that good structural integrity to support heavy equipment is achieved. No compaction of the clean fill will occur other than that provided by the placement equipment. The placement of clean fill will be performed to promote drainage and create a crown such that a two to ten percent slope is achieved.

Existing environmental control structures will be extended, raised or reconstructed as needed, including but not limited to: piping, gas extraction wells, air and forcemain, condensate sumps, and roadways.

Intermediate cover soil will be placed over areas that receive clean fill. The intermediate cover will be a minimum thickness of one foot (1') of soil cover on areas that receive clean fill on the sanitary landfill which are idle for more than sixty (60) days. As an alternative the Bridgeton Landfill may place an entirely new EVOH "overcap" on the new fill surface as outlined in the CEC report referenced above.

Additional stormwater controls will be installed as needed to control soil erosion and direct the stormwater to the perimeter ditch. Storm water discharges will be through the Bridgeton Landfill outfalls included in permit MO-0112771.

Please note, this is not intended to be the final cover system however an interim measure to promote storm water drainage. The final cover system will be designed and submitted for approval to the Missouri Department of Natural Resources and the St. Louis County Health Department once the subsurface smoldering event has been addressed.

#### Records

The Bridgeton Landfill will be responsible for keeping an accurate system of records, including the following records:

1. List of vehicles that have been delivering clean fill to the landfill and the amount received.
2. Daily clean fill received and the area where the materials were placed.

Bridgeton Landfill will maintain records on-site of the quantity of clean fill received and the area where the clean fill was placed.

#### Schedule

The Bridgeton Landfill requests expedited review of this submittal and want to commence work on this project on or around June 15, 2015. Placement of clean fill will be ongoing due to the accelerated settlement. Bridgeton Landfill will keep the MDNR abreast of these improvements and the areas to receive additional clean fill on a monthly basis in the status report.

#### Variance:

The St. Louis County Ordinance specifies clean fill in Section 1 Chapter 607.040 (8), and further stipulates that:

“Painted materials such as concrete, asphaltic concrete, cinder blocks and brick will be considered for clean fill following a risk based assessment to determine the material will not pose an environmental or public health nuisance.”

As a consideration of this modification, Bridgeton Landfill requests a variance from the St. Louis County Ordinance on the use of painted materials. Because Bridgeton Landfill is a landfill, the site is already regulated under the county and state solid waste rules and permits. Bridgeton Landfill is an inactive site with environmental controls including leachate removal and pretreatment, a gas collection system, groundwater monitoring system and gas monitoring

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network system. The risk of the painted materials, or the paint through degradation, is de minimus. There is little or no additional environmental or health risk to allowing the use of painted materials in the clean fill.

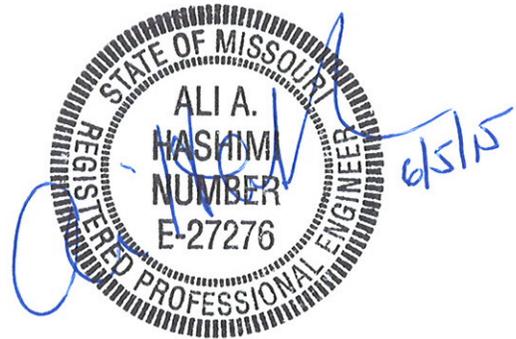
We would be happy to discuss this in further detail at your earliest convenience. Please contact Brian Power, the Environmental Manager for the Bridgeton Landfill at (314) 744-8165.

Sincerely,

Weaver Consultants Group, LLC



Ali Hashimi, P.E.  
Principal



Cc: Brian Power, Bridgeton Landfill, LLC  
James Getting, Bridgeton Landfill, LLC