



March 22, 2016

Mr. Paul Morris
 Water Pollution Control Unit Chief
 Missouri Department of Natural Resources
 St. Louis Regional Office
 7545 South Lindbergh, Suite 210
 St. Louis, MO 63125

RE: Notification of Final Effluent Limit Exceedances
 First Quarter 2016 NPDES Event
 Bridgeton Landfill LLC, Bridgeton, Missouri
 Permit No. MO-0112771

Dear Mr. Morris:

Pursuant to Section B.2 of the November 1, 2013 Standard Conditions for NPDES Permits contained in the Missouri State Operating Permit (Permit No. MO-0112771), and on behalf of Bridgeton Landfill LLC, Feezor Engineering, Inc. is submitting this Notification of Final Effluent Limit Exceedances. Samples were collected on March 10, 2016 during the First Quarter 2016 monitoring period. Based on the laboratory analytical results received March 18, 2016 from Teklab, Inc., the following results exceeded Final Effluent Limitations:

Outfall	Parameter	Result	Permitted Daily Maximum	Permitted Monthly Average
Outfall 005	Iron, total	1,350 µg/L	1,639 µg/L	817 µg/L
Outfall 007	BOD ¹	438 mg/L	45 mg/L	30 mg/L
	COD ²	689 mg/L	120 mg/L	90 mg/L
	Iron, total	3,720 µg/L	1,639 µg/L	817 µg/L

Notes:

¹ Biochemical Oxygen Demand

² Chemical Oxygen Demand

Outfall 005

Outfall 005 is located in the southeast corner of the South Quarry at the Bridgeton Landfill. The only exceedance for this outfall, as measured during the First Quarter 2016 Event, was for Iron (Total). The exceedance is likely attributed to construction improvements in the vicinity of the

outfall. The Bridgeton Landfill has implemented the following Best Management Practices (BMPs) in an effort to reduce and eliminate exceedances at Outfall 005:

- 1) During the Second Quarter of 2013, two HDPE lined stormwater retention ponds were constructed upgradient of Outfall 005. These ponds allow sediment to settle out of runoff prior to exiting the fenced property boundary;
- 2) The drainage channel was power washed in late Second Quarter 2015 into early Third Quarter 2015 using high pressure water and vacuum trucks to fluidize and remove solids. Discharge culverts were blocked by using inflatable bladders or "pigs" to prevent any of the soils from reaching the outfall during this cleaning. All associated fluidized waters were processed through the Bridgeton Landfill leachate pretreatment facility;
- 3) The rip-rap drainage swale immediately upstream of the discharge location was replaced with a constructed concrete drainage swale during December 2015 and January 2016; and
- 4) On-site personnel inspect the lined ditches on a regular basis.

Outfall 007

Outfall 007 is located at the facility entrance along St. Charles Rock Road. The following description provided by the Bridgeton Landfill facility details ongoing efforts and BMPs that have been implemented in the effort to reduce, eliminate, and prevent recurrence of exceedances at Outfall 007:

- 1) Bridgeton Landfill, LLC has contracted Civil and Environmental Consulting, Inc. to provide an engineered redesign of the Outfall 007 drainage system, including a re-evaluation of the drainage area capacity and with additional focus given to assessment of the latest advancements in best management practices;
- 2) A series of rip-rap check dams and filtration socks have been installed in the cement swale directly upgradient of Outfall 007 to facilitate the settling out of sediment prior to exiting the property and to reduce water velocity;
- 3) A constructed stormwater filtration system uses gravel and sand media and a series of weirs to filter stormwater prior to discharge at Outfall 007. The filtration media was changed out on March 20 and March 21, 2015.
- 4) A rip-rap letdown has been constructed at Outfall 007 at the fenced boundary to collect additional sediment and further reduce water velocity. Rip-rap is periodically changed out and reconstructed as needed;
- 5) Above-ground and underground surface water discharge swales, piping, and surface drains from Outfall 007 back to the transfer station have been cleared of material and debris. Cement swales were pressure-washed to remove any surface build-up. The cleaning schedule has been changed to quarterly;
- 6) The transfer station tipping floor cleaning and housekeeping schedule has been modified to be more effective in reducing the possibility of pollution. This included installation of a silt trap dedicated to transfer station surface runoff; and

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- 7) Bridgeton Landfill has received quotes from contractors to execute the engineering design for repair and enhancement of Outfall 007. This project is expected to start and be completed prior to the second quarter sampling event.

Additionally, the Bridgeton Landfill continues to work with engineers to design and implement additional site-wide stormwater controls and improvements, including drainage improvements, additional pollution control measures, and additional sediment removal from line swales.

If a representative from the Missouri Department of Natural Resources-St. Louis Regional Office would like to observe the implemented BMPs at the site, Bridgeton Landfill site personnel would be available to help coordinate such a visit. The site Environmental Manager, Brian Power, can be contacted at 314-744-8165 or the site Environmental Specialist, Derek Bouchard, can be contacted at 314-302-3634 if you have any questions or comments.

If you have any questions regarding the information provided in this letter, please contact the undersigned at your earliest convenience.

Sincerely,



Jonathan E. Wilkinson, P.E.
Project Manager