



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

DEPARTMENT OF NATURAL RESOURCES

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April 21, 2014

CERTIFIED MAIL # **9171 9690 0935 0051 4823 26**
RETURN RECEIPT REQUESTED

Mr. Brian J. Power, Environmental Mgr.
Bridgeton Landfill, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Power:

NOV #SLR11434218

On February 11, 2014, an inspection was conducted of the Bridgeton Sanitary Landfill by Mr. Joe Trunko of my staff and Mr. Larry Lehman of the Solid Waste Management Program. The purpose of the inspection was to assess the facility's compliance with regulations pursuant to the Missouri Solid Waste Management Law and with the conditions of Permit #118912. A report and checklist of the inspection with attachments are enclosed for your review.

The findings of the inspection warrant the issuance of Notice of Violation (NOV) #SLR11434218 (enclosed). Specifically, this NOV is being issued for the following:

1. The storage or disposal of solid waste in a manner that creates a public nuisance or adversely affects public health.
2. Failure to operate the landfill in a manner which protects the health and safety of personnel and others associated with and affected by its operation.
3. Failure to operate the landfill in compliance with the terms and conditions set forth in the permit to prevent or minimize potential health hazards or conditions that could create a public nuisance or environmental pollution.
4. The burning of solid waste.
5. Conducting solid waste burning operations in violation of the rules and regulations of the Missouri Air Conservation Commission or the Department.
6. Methane exceeding 2.5 percent by volume in the soil at the property boundary.
7. Failure to construct and operate the landfill in accordance with the approved plans and specifications.
8. Failure to operate and maintain the leachate collection system in accordance with the permit and approved plans.
9. Failure to control leachate onsite.

A detailed description of the violations above is included in the Areas of Non- Compliance section of the enclosed report. Additional comments are included in the Areas of Concern section of the report.

On July 23, 2012, NOV #30428 was issued to Bridgeton Landfill, LLC for many of the violations noted above. Due to the ongoing subsurface smoldering event and compliance issues at the facility, the First Agreed Order of Preliminary Injunction was entered by the St. Louis County Circuit Court on May 13, 2013. Bridgeton Landfill, LLC must continue to implement the required actions specified in the Agreed Order.

Odors continue in both frequency and intensity. Bridgeton Landfill, LLC must continue to assess and address odor sources and implement corrective actions.

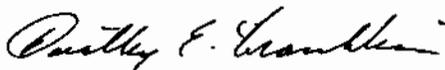
Items 1 and 2 in the Areas of Concern section of the report request that information be submitted to the Department. Bridgeton Landfill, LLC must submit this information to the Solid Waste Management Program by May 31, 2014.

Should you have any questions concerning this report, please contact Mr. Larry Lehman, Missouri Department of Natural Resources, Solid Waste Management Program, P.O. Box 176, Jefferson City, MO 65102, phone (573) 751-5401, email larry.lehman@dnr.mo.gov or Joe Trunko, Missouri Department of Natural Resources, St. Louis Regional Office, 7545 South Lindbergh Blvd., Suite 210, St. Louis, MO 63125, phone (314) 416-2960 or email joe.trunko@dnr.mo.gov.

The Department urges Bridgeton Landfill, LLC to continue efforts to contain the subsurface smoldering event and ensure ongoing violations are resolved as quickly as possible.

Sincerely,

ST. LOUIS REGIONAL OFFICE



Dorothy E. Franklin
Regional Director

DEF/JLT/jh

Enclosures

c: Mr. Jim Teter, Republic Services, Inc.
Ms. Jessie Merrigan, Lathrop & Gage
Mr. John Haasis, St. Louis County Department of Health-Solid Waste Management Program
Ms. Kathrina Donegan, St. Louis County Department of Health-Air Program
Mr. Daren Eppley, Assistant Attorney General
Dr. Timothy Stark, Consultant
Mr. Todd Thalhamer, Consultant
Mr. Aaron Schmidt, Division of Environmental Quality
Mr. Chris Nagel, Solid Waste Management Program (via exchange drive)
Mr. Brian Allen, Environmental Services Program

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