



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

DEPARTMENT OF NATURAL RESOURCES

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JUN 20 2014

Mr. Brian Power
Environmental Manager
Republic Services, Inc.
13570 St. Charles Rock Rd.
Bridgeton, MO 63044

RE: Status of Subsurface Smoldering Event and Incident Management Plan, Bridgeton Landfill,
Permit Number 0118912, St. Louis County

Dear Mr. Power:

The Department of Natural Resources' Solid Waste Management Program has enclosed a copy of a recent data package report completed by Todd Thalhamer, P.E., the program's contracted landfill fire expert, for your review and follow-up. As you will see from the report, Mr. Thalhamer continues to be concerned, as does the program, about the potential for a surface fire occurring at the Bridgeton Landfill. The majority of the South Quarry is involved in the subsurface smoldering event and the southern portion of the neck is now experiencing increased temperatures. The program's monitoring focus is on the neck area of the landfill.

The effort Bridgeton Landfill and Republic Services has put forward since the surface fire on February 16, 2014 has led to improvements in communication and processes to be used by facility staff, first responders and regulatory agencies should a surface fire or other incident occur at the facility. Landfill staff, first responders and Department staff have been meeting monthly to improve upon and finalize the Incident Management Plan (IMP) for Bridgeton Landfill. I understand that as of yesterday's meeting (June 19, 2014) the Incident Management Plan is final.

During the coming month, the first responders will be preparing their Incident Action Plans in anticipation for the July Incident Management Strategies Meeting. Additionally, fire district command staff site tours to familiarize them with the facility are being scheduled in July. In addition to the IMP, Bridgeton Landfill activities have included:

- Purchase of firefighting foam;
- Outfitting of an ATV as an "all-terrain ambulance";
- Purchase of a storz connection allowing for connection of the facility's water truck to the fire district's pumps;
- Design and development of a web portal to provide Material Safety Data Sheets and updates to the IMP such as quarterly maps of landfill infrastructure;

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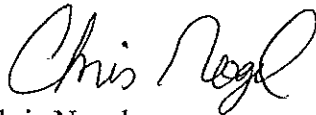
- Identification of soil stockpiles on the maps provided; and
- With finalization of the plan, marking of roadways.

With completion of the IMP, the expectation is the facility will maintain its diligence in monitoring the Bridgeton Landfill for increased temperatures with specific attention given to the neck area. Early detection of indicators, such as increasing surface temperature allows for timely implementation of preventative measures and coordination with other agencies in these ongoing efforts. Our expert and the program believe the IMP is adequate to address a surface fire. If Bridgeton Landfill has prepared any additional measures or protocols to address a surface fire, please provide a copy for the facility file.

If you should have any questions about this letter or the data analysis, please contact me or Brenda Ardrey at 573-751-5401 or the Solid Waste Management Program, P.O. Box 176, Jefferson City, MO 65102-0176. Thank you.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



Chris Nagel
Director

CN:bak

c: Mr. Todd Thalhamer, Hammer Consulting Services
Chief Terry Loehrer, Pattonville Fire Protection District
Chief Don Miner, Robertson Fire Protection District
Ms. Brenda Ardrey, Chief, Operations Section SWMP
Mr. Larry Lehman, Chief, Compliance/Enforcement Section SWMP
Ms. Charlene Fitch, Chief, Engineering Section SWMP
St. Louis Regional Office via Electronic Shared File