

**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 November 2014, 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 coordination with utility company for final connection of the natural gas line to the flare compound;
8. Continuation of operation of leachate pre-treatment plant including receipt of MSD final acceptance of pre-treatment plan for permit compliance;
9. Continuation of construction on phases one, two and three, and planning for phase four, of leachate force main;
10. Begin the installation of an 18 inch header line along the south section of the south quarry;
11. Continuation of implementation of Odor Management Plan;
12. Continuation of work to lower gas extraction wells;
13. Continuation of repair work conducted pursuant to the approved flowable fill work plan;
14. Continuation of weekly temperature monitoring of neck area Gas Extraction Wells;
15. Continuation of expanded cooling pilot study, including initiation of temperature reporting from new TMPs; and
16. Continuation of routine operation and maintenance of gas interceptor wells and temperature monitoring probes.

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:

17. The weekly reports required under Section 52.F were submitted on November 7th, November 14th, November 21st and November 28th;
18. The monthly report required under Section 52.E was submitted on November 20, 2014;
19. The assessment report for the first phase of pilot study conducted under the Odor Investigation required by the Second Amendment to the First Agreed Order was submitted on November 14, 2014;
20. The plans and proposals for the TMPs requested by MDNR's October 7, 2014, letter were submitted on November 6, 2014; and
21. The proposal for neck area corrective action requested by MDNR's October 7, 2014, letter was submitted on November 6, 2014.

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:

22. Submit engineering drawings for the installation of 4 re-drill and 1 new gas extraction well;
23. Continue ditch and drainage work and routine sediment and erosion control;
24. Continue operations of the on-site leachate pre-treatment plant, and tank farm;
25. Continue implementation of the Odor Management Plan;
26. Continue coordination with the utility company of final connection of the natural gas line to the flare compound;
27. Continue work to lower gas extraction wells;
28. Continue repair work in compliance with the approved flowable fill protocol;

29. Continue construction on the leachate force main; and
30. Continue implementation of approved expanded heat extraction pilot study.

Dated: December 1, 2014

LATHROP & GAGE LLP

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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 1st day of December, 2014, upon the following counsel of record:

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