



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

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

www.dnr.mo.gov

MAR 25 2016

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

RE: Inert Gas Injection Work Plan, Bridgeton Landfill, Permit Number 0118912, St. Louis County

Dear Mr. Power:

This letter is in response to submittals for Bridgeton Landfill titled "Response to MDNR September 24, 2015 Comments on Inert Gas Injection Work Plan", dated November 10, 2015, with a cover letter dated November 11, 2015; "Evaluation of Remedial Action Approaches for Hot Spot Remediation" and "Inert Gas Injection Work Plan for Hot Spot Remediation", both dated September 9, 2015; and "Corrective Action Assessment and Plan – Neck Area and North Quarry", dated August 25, 2015. All submittals were received by the Missouri Department of Natural Resources' Solid Waste Management Program (SWMP).

Bridgeton Landfill submitted the evaluation, work plan and supporting documents as a contingency measure for use in the event of an isolated subsurface fire ("hot spot") developing in the Bridgeton Landfill North Quarry.

The SWMP has reviewed the submittals for compliance with the Solid Waste Management Law and regulations and hereby provides written approval of the proposed work plan.

The SWMP expects that Bridgeton Landfill will develop and implement triggers by which to implement this work plan, such as temperatures greater than 185° F in a gas extraction well or greater than 200° F for a temperature monitoring probe. It is also an expectation that any area in the North Quarry exhibiting 1500 ppm of carbon monoxide or greater would be investigated to see if nearby temperatures exceed any temperature trigger levels. Further, the SWMP expects that Bridgeton Landfill will develop and implement contingency contracts to ensure that all necessary materials and contractors are immediately available to implement the inert gas injection work plan, should it be needed. The expectation is that the work plan could be implemented in a period of time as short as seven days. Nothing in this letter limits the department's authority to order the plan be implemented in the event Bridgeton Landfill fails to do so when triggers are met.

The following documents are hereby incorporated into Permit Number 0118912:

**DOCUMENTS:**

1. "Response to MDNR September 24, 2015 Comments on Inert Gas Injection Work Plan", dated November 10, 2015, received by the SWMP via email on November 12, 2015, from Brian J. Power, Area Environmental Manager, Republic Services, Inc.
2. "Evaluation of Remedial Action Approaches for Hot Spot Remediation" and "Inert Gas Injection Work Plan for Hot Spot Remediation", dated September 9, 2015, received by the SWMP via email on September 9, 2015, from Brian J. Power, Area Environmental Manager, Republic Services, Inc.
3. "Corrective Action Assessment and Plan – Neck Area and North Quarry", dated August 25, 2015, received by the SWMP via email on November 12, 2015, from Brian J. Power, Area Environmental Manager, Republic Services, Inc.

This approval is not to be construed as compliance with any existing federal or state environmental laws; nor should this be construed as a waiver of any regulatory requirement. This approval is not to be construed as compliance with any existing local permitting or zoning ordinances; nor does it supersede any local permitting and/or zoning requirements.

The department reserves the right to revoke, suspend, or modify this approval and/or Permit Number 0118912 after due notice for failure to maintain compliance with the Missouri Solid Waste Management Law and regulations, the terms and conditions of the permit and approved engineering plans and specifications.

If you were adversely affected by this decision, you may be entitled to pursue an appeal before the Administrative Hearing Commission. To appeal, you must file a petition with the Administrative Hearing Commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the Administrative Hearing Commission. Any appeal must be directed to:

Administrative Hearing Commission  
United States Post Office Building, Third Floor  
131 West High Street  
P.O. Box 1557  
Jefferson City, MO 65102  
Telephone: 573-751-2422  
Fax: 573-751-5018  
Website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc)

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If you have any questions or comments regarding this letter, please contact Mr. J. P. Boessen of my staff at (573) 526-3940 or P.O. Box 176, Jefferson City, MO 65102-0176.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



Charlene S. Fitch, P.E.  
Chief, Engineering Section

CSF:jbl

c: Mr. Bill Beck, Lathrop & Gage  
Ms. Ally Cunningham, Lathrop & Gage  
Ms. Thais Folta, Attorney General's Office  
Mr. Larry Lehman, Chief, Compliance/Enforcement Section, SWMP  
Ms. Laura Yates, St Louis County Department of Public Health  
Mr. Joe Trunko, St. Louis Regional Office via Electronic Shared File