



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

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

DEC 26 2014

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

RE: November and December Gas Wellfield Data, Bridgeton Sanitary Landfill,
Permit Number 0118912, St. Louis County

Dear Mr. Power:

This letter is in follow-up to Republic Services' submission on December 21, 2014, of Bridgeton Landfill's November Monthly Report as required by the First Agreed Order. The Solid Waste Management Program's (SWMP's) initial review of the reports and associated data identified an area of unexplained change, i.e., landfill gases and wellhead temperatures fluctuating outside trends previously reported and low levels of carbon monoxide in some wells, in the North Quarry. (See attached map for North Quarry review area.) Following a discussion with SWMP staff on December 23, 2014, Bridgeton Landfill submitted a data file to the SWMP containing gas extraction well data through December 23 for wells located in the North Quarry.

In conducting our data evaluation, we examined trend information inclusive of the facility's data submissions from July to mid-December 2014. The SWMP has concerns related to the period mid-October through mid-December 2014 as explanations for the fluctuations observed in wellfield and other data were not disclosed in data files or associated reports. We understand from our discussion with Bridgeton Landfill staff that gas extraction wellheads within the North Quarry were replaced with new Landtec wellheads intended to provide improved wellfield management in the North Quarry. From limited monitoring data currently available following installation of the wellheads, whether this operational modification has addressed the conditions of concern in this critical area of the North Quarry is both unclear, and unproven.

The area of concern is located in the northwest area of the North Quarry where leachate outbreaks were previously seen and also, along the northern slope of the North Quarry in close proximity to previously identified radiologically impacted material detections and the West Lake Landfill Operable Unit 1, Area 1. To be protective of public safety and the environment in this highly populated area of St. Louis County, the SWMP is requiring Bridgeton Landfill to immediately proceed with installation of two (2) additional temperature monitoring probes (TMPs). These TMPs will provide actual temperature readings from within the waste mass and will assist the permitted facility and SWMP in monitoring for changes that might warrant immediate corrective action be taken by Bridgeton Landfill. One TMP is to be located between

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GEW-3 and GEW-4 and the other TMP between GEW-2 and GEW-46. Actual physical TMP locations will be agreed upon by Bridgeton Landfill and the SWMP no later than January 5, 2015. (See attached map for general location of TMPs.) These new TMPs must be installed by February 1, 2015. Additionally, to monitor for any change in the contours of the northern slope, Bridgeton Landfill is required to install, at no less than 50 foot intervals, slope monitoring stakes along the northern slope of the North Quarry.

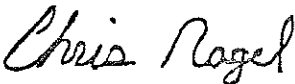
Further, until otherwise determined by the SWMP, beginning with the January 2, 2015, Weekly Report or the January 20, 2015, Monthly Report as detailed below, Bridgeton Landfill is required to submit the following data to supplement monitoring in this critical area:

- Weekly down-hole temperature readings from North Quarry gas extraction wells: GEW-2, -3, -4, -5, -42R, -45R, -46R, -47R, -48, and -49. Weekly reports must be received each Friday by 4:00 p.m.
- Monthly carbon monoxide data from the following North Quarry gas extraction wells: GEW-2, -3, -4, -5, -8, -42R, -45R, -46R, -47R, -48, -49, -53 and -55.

If you have any questions or comments regarding this letter, please contact me or Brenda Ardrey of my staff at (573) 526-3900 or P.O. Box 176, Jefferson City, MO 65102-0176.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



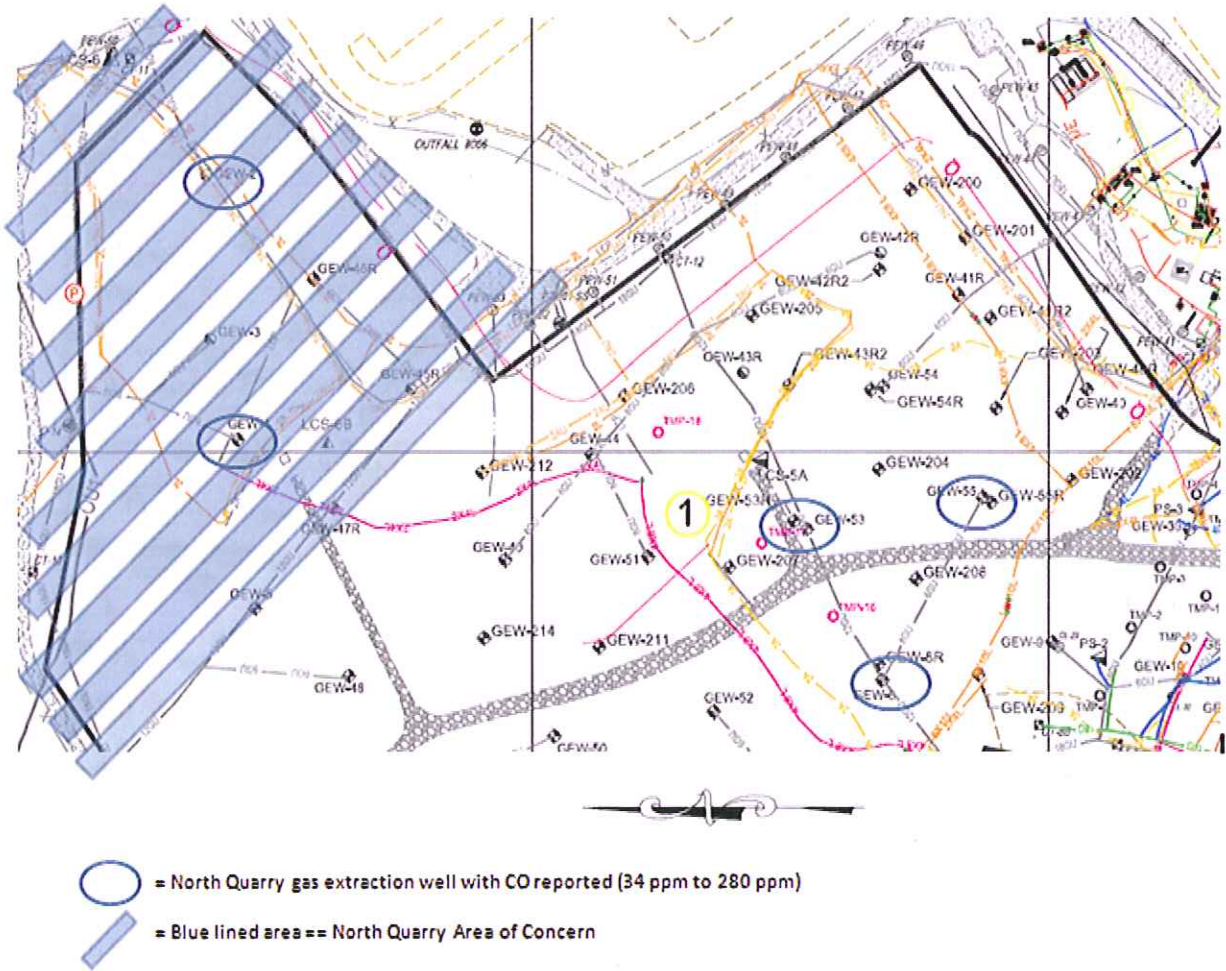
Chris Nagel
Director

CN:bam

c: Mr. Tom Phillips, Attorney General's Office
Ms. Jessie Merrigan, Lathrop and Gage
Ms. Leanne Tippet Mosby, Director, Division of Environmental Quality
Ms. Charlene Fitch, Chief, Engineering Section, SWMP
Mr. Larry Lehman, Chief, Compliance/Enforcement Section, SWMP
Ms. Brenda Ardrey, Chief, Operations Section, SWMP
Mr. Mark Milward, St. Louis County Department of Health
Ms. Laura Yates, St. Louis County Department of Health
St. Louis Regional Office via Electronic Shared File

Bridgeton Sanitary Landfill
North Quarry Area of Concern

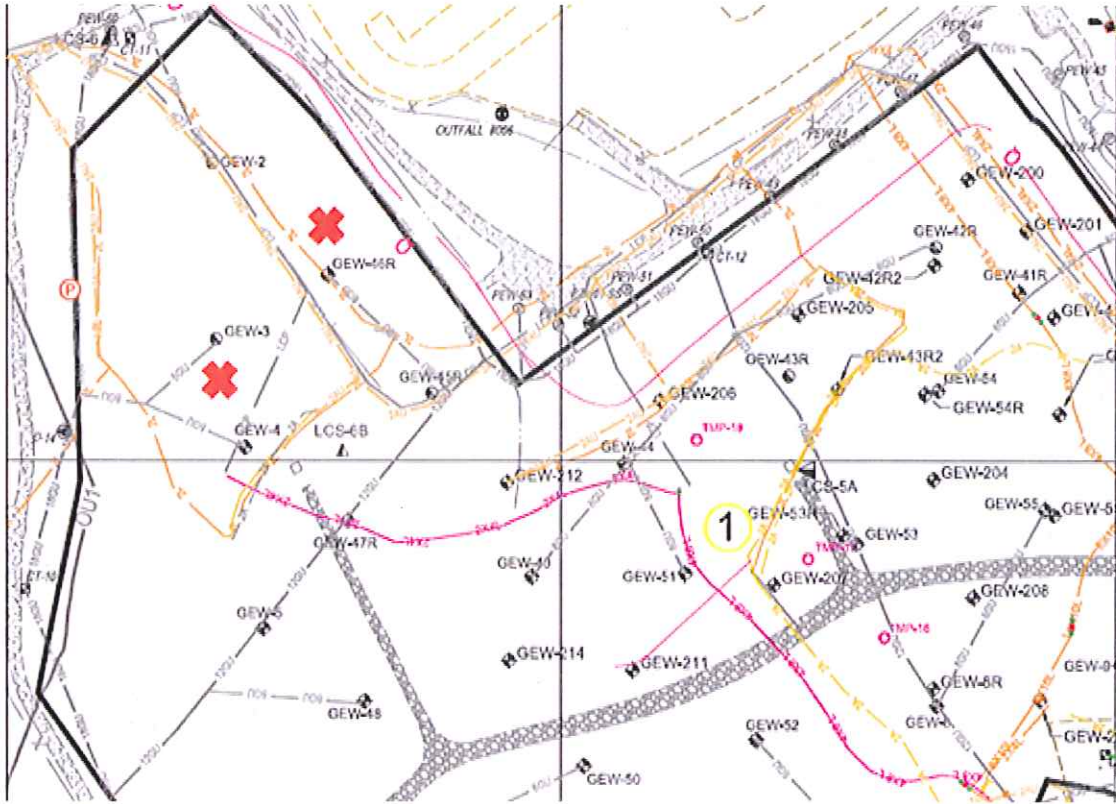
Source of drawing: Submitted by Feezor Engineer, Inc. for Bridgeton Landfill – Q3 Site Infrastructure



Bridgeton Sanitary Landfill

Locations of Two (2) Additional Temperature Monitoring Probes in Bridgeton Landfill's North Quarry

Source of drawing: Submitted by Feezor Engineer, Inc. for Bridgeton Landfill – Q3 Site Infrastructure



X = location for additional North Quarry temperature monitoring probe.