

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

13 SEP -3 PM 3:19

STATE OF MISSOURI ex rel., Attorney)
General Chris Koster and the Missouri)
Department of Natural Resources,)
)
Plaintiff,)
)
v.)
)
REPUBLIC SERVICES, INC.,)
)
ALLIED SERVICES, LLC,)
d/b/a Republic Services of Bridgeton, and)
)
BRIDGETON LANDFILL, LLC,)
Defendants.)

JOHN W. PALMER
CIRCUIT CLERK

Case No. 13SL-CC01088

STATUS REPORT

1. Comes now Bridgeton Landfill, LLC (“Bridgeton Landfill”) by and through counsel, and states as follows:

2. On May 13, 2013, an Agreed Order entered ordering a status report to be submitted on or before June 3, 2013 and the first business day of each month thereafter.

3. The status update must discuss, at a minimum, work on site, compliance with the Agreed Order, and planned activities for the next 30 days.

4. This serves as a status report as required under the Agreed Order.

REPORT OF WORK ON SITE

During August 2013, Bridgeton Landfill conducted the following Work on the Site:

5. Completion on August 7, 2013, of cap installation and other site improvements, in compliance with the “Ethylene Vinyl Alcohol (EVOH) Capping Plan for South Quarry” approved by MDNR;

6. Routine erosion control and maintenance and ongoing monitoring consistent with facility operations and agreed process;
7. Continuation of operation and maintenance of gas collection and control system;
8. Final planning for installation of two candle stick flares;
9. Continuation of monitoring of conditions at LCS-1, LCS-3 and LCS-4;
10. Development of plans to install Black Hawk pumps (8gpm) at LCS-1 and LCS-3;
11. Completion of removal of stored leachate material and cleanout of tanks, and reduction in number of temporary storage containers remaining on site;
12. Continuation and initiation of pilot studies on clarifier, electro coagulations, and biological reactor treatment processes for leachate pre-treatment;
13. Installation of and initiation of operation of Thermal Oxidizer air treatment unit on leachate treatment tank;
14. Continuation of work on leachate pretreatment plan and initiation of construction preparations for first one million gallon storage tank;
15. Initiation of pilot study on filter press; 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 August 6, 2013; August 13, 2013; August 20, 2013; and August 27, 2013;

18. The monthly report required under Section 52.E was submitted on August 20, 2013;
19. The Revised North Quarry Contingency Plan, Part I, required under Section 17.A and response to comments, was submitted on August 13, 2013;
20. The RCP Abandonment Project Documentation and CQA Report was submitted on August 2, 2013; and
21. Bridgeton Landfill reimbursed \$433,724.36 in MDNR oversight and contractor costs.

REPORT OF PLANNED ACTIVITIES FOR NEXT 30 DAYS

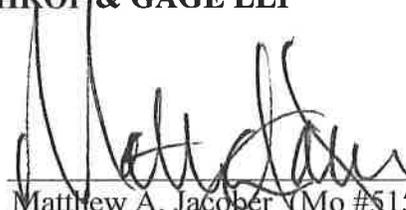
During the next thirty (30) days, Bridgeton Landfill plans to conduct the following activities at the Site:

22. Continue to remove temporary storage containers;
23. Continue ditching and drainage work and routine sediment and erosion control;
24. Installation of Black Hawk pumps at LCS-1 and LCS-3;
25. Continue construction and planning of the on-site leachate pre-treatment plant, including pilot studies and construction of one million gallon storage tank;
26. Submit Final Operation Maintenance and Monitoring Program Manual;
27. Submit Leachate Pre-Treatment System Plan;
28. Submit updated natural gas line progress report;
29. Respond to MDNR, MDHSS and EPA Comments on GCPT Work Plan; and
30. Respond to any Comments on North Quarry Contingency Plan, Part II in timeframe consistent with Agreed Order.

Dated: September 3, 2013

LATHROP & GAGE LLP

By:


Matthew A. Jacober (Mo #51585)

mjacob@lathropgage.com

William G. Beck (Mo. #26849)

wbeck@lathropgage.com

Allyson E. Cunningham (Mo. #64802)

acunningham@lathropgage.com

Pierre Laclede Building

7701 Forsyth Blvd.

St. Louis, MO 63105

Phone: (314) 613-2800

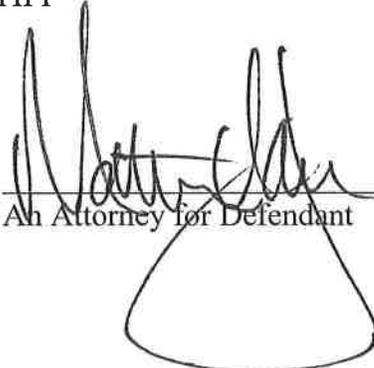
Fax: (314) 613-2801

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 3rd day of September, 2013, upon the following counsel of record:

Chris Koster
Attorney General, State of Missouri
Jessica L. Blome
Kara L. Valentine
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573.751.3640
Fax: 573.751.8796
Jessica.blome@ago.mo.gov
Kara.valentine@ago.mo.gov
ATTORNEYS FOR PLAINTIFF



An Attorney for Defendant