Response to MDNR Comment Letter Dated April 27, 2018
Regarding Groundwater Evaluation Report
Bridgeton Landfill, LLC – Bridgeton Landfill
Missouri DNR Permit #MO – 118912

Dear Ms. Fitch:

Bridgeton Landfill, LLC received correspondence from the Missouri Department of Natural Resources’ Solid Waste Management Program (MDNR-SWMP) dated April 27, 2018 that commented on a December 26, 2017 submittal by Feezor Engineering entitled Groundwater Evaluation Report, Bridgeton Landfill, Bridgeton, Missouri (GWER). MDNR-SWMP’s April 27, 2018 letter included comments from the Missouri Geological Survey (MGS) regarding the groundwater monitoring network proposed in the GWER. Based on MGS’s comments, MDNR-SWMP provided three (3) comments concerning future groundwater sampling at the Bridgeton Sanitary Landfill. The comments are reiterated below in bold font, with Bridgeton Landfill, LLC’s responses in italics.

Since issuance of MGS’s review and MDNR-SWMP’s comment letter, the United States Environmental Protection Agency, Region 7 (EPA) has issued a Special Notice Letter for OU-3 Remedial Investigation/Feasibility Study for the West Lake Landfill Site. This Notice and enclosed Scope of Work describe EPA’s expectation that the potentially responsible parties’ (PRPs’) undertake a Remedial Investigation and Feasibility Study of groundwater at the West Lake Landfill Site (designated as Operable Unit 3, or OU-3). The West Lake Landfill Site includes the Bridgeton Sanitary Landfill. Based upon the proposed Scope of Work and EPA’s prior directions regarding groundwater sampling, Bridgeton Landfill, LLC expects the groundwater investigation to be comprehensive. For that reason we would suggest that we evaluate the Bridgeton Landfill groundwater monitoring network in order to assess how to best coordinate the investigation and monitoring scopes and tasks.

Comment 1: The SWMP has determined wells PZ-208-SS and PZ-114-AS will remain part of the groundwater monitoring network, but the monitoring frequency for these wells can be lowered to annually if the facility chooses.
Response: Please note that well PZ-208-SS is not currently part of Bridgeton’s groundwater monitoring network and is located on property owned by Virbac. Bridgeton Landfill, LLC understands that Virbac monitors PZ-208-SS on an annual basis. Bridgeton Landfill, LLC requests that MDNR-SWMP contact Virbac for copies of annual analytical results for PZ-208-SS.

Although Bridgeton Landfill, LLC believes PZ-114-AS to be impacted by an off-site source, we agree to include the well in the groundwater monitoring network and monitor it on a reduced frequency of once per year.

Comment 2: The SWMP has determined that well PZ-206-SS should be added to the detection monitoring well network.

Response: Bridgeton Landfill, LLC would like to point out that PZ-206-SS has not exhibited inorganic Maximum Contaminant Level (MCL) exceedances or confirmed organic detections. Also, there is already an unimpacted detection monitoring well (PZ-109-SS) located directly east of PZ-206-SS and closer to the compliance boundary. However, Bridgeton Landfill, LLC agrees to include PZ-206-SS to the groundwater detection monitoring network.

Comment 3: The SWMP has determined wells PZ-100-KS, PZ-106-KS, and PZ-111-KS should become part of the groundwater monitoring network. The monitoring frequency for these wells can be lowered to annually after a sufficient number of samples have been collected to produce a sufficient background sample size and statistical power for adequate statistical evaluation.

Response: It appears, based on MGS’s comments, that the primary reason MGS desires to add Burlington-Keokuk Limestone wells PZ-100-KS, PZ-106-KS, and PZ-111-KS to the groundwater monitoring network is due to the confirmed organic constituent detections in groundwater at PZ-104-KS. Wells screened in this zone are typically around 400 feet in depth, and exhibit an upward gradient, making it unlikely that leachate or landfill gas impacts from the shallower aquifers would have impacted the well. Bridgeton Landfill, LLC believes that PZ-104-KS has well integrity issues which have led to the recent low-level benzene detections. Field testing has shown concentrations of methane, carbon monoxide, and benzene at the PZ-104-KS well head, indicating the well has been compromised. Bridgeton Landfill, LLC will complete an evaluation of the integrity of PZ-104-KS and will submit the findings and recommendations to MDNR-SWMP prior to the third quarter 2018 monitoring event. The well will be sampled per the assessment monitoring program during second quarter 2018.

Bridgeton Landfill, LLC does not agree that PZ-100-KS, PZ-106-KS or PZ-111-KS need to be added to the groundwater monitoring network. All available data have confirmed absence of impact in those wells. In addition, the OU-3 Remedial Investigation will include monitoring of the Burlington-Keokuk Limestone and the planned sampling of these wells for the OU-3 Remedial Investigation will provide sufficient data for evaluation of those wells.
Conclusion

MDNR-SWMP’s April 27, 2018 letter indicated that a revised Groundwater Monitoring Plan that incorporates the additional monitoring wells into the groundwater detection monitoring network and into the assessment monitoring network where appropriate is due to the Department within fifteen (15) days of receipt of their letter. Since the Groundwater Monitoring Plan has not been updated since 1999, it is not possible to prepare a comprehensive updated plan within fifteen (15) days. Bridgeton Landfill, LLC is working diligently on updating the plan and requests to submit the revised Groundwater Monitoring Plan to MDNR-SWMP within thirty (30) days of receipt of the April 27, 2018 letter. Bridgeton Landfill, LLC requests to revise and submit the revised Groundwater Statistical Analysis Plan and revised Assessment Monitoring Plan within 60 (sixty) days of receipt of the April 27, 2018 letter. Changes to the detection and assessment monitoring networks will be implemented in the field during the event following written approval by MDNR-SWMP.

Bridgeton Landfill, LLC requests a meeting with MDNR-SWMP to discuss future groundwater monitoring efforts to ensure that the comprehensive monitoring proposed in the December 2017 GWER, as modified per MDNR-SWMP’s comments, will dovetail with the upcoming OU-3 groundwater activities.

Please feel free to contact me with any questions or comments at 209-227-9531.

Thank you,

Erin Fanning
Division Manager
Bridgeton Landfill LLC

Mr. Chris Nagel, Director, SWMP
Mr. Mike Parris, Chief, Compliance/Enforcement Section, SWMP
St. Louis Regional Office via Electronic Mail
Ms. Dana Sincox, Bridgeton Landfill, LLC