



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JAN 15 2019

Ms. Erin Fanning
Division Manager
Republic Services, Inc.
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Stormwater Management Evaluation Report, Bridgeton Landfill, LLC, Permit Number 0118912, St. Louis County

Dear Ms. Fanning:

This letter is in response to Bridgeton Landfill's submittal of the "Stormwater Management Evaluation Report", dated December 2018, and received by the Missouri Department of Natural Resources' Solid Waste Management Program (SWMP) on January 2, 2019. The submittal was prepared by Civil and Environmental Consultants, Inc., and sealed and submitted by Daniel R. Koziatek, P.E. Two hard copies of the submittal were received.

The SWMP shared your submittal with the Department's Water Protection Program and Hazardous Waste Program Federal Facilities Section and we have the following comments:

COMMENTS:

1. Section 2.1 & 2.3 (Outfalls #003 and #005)

Outfall #003 receives pumped discharges from Outfall #005. This is not reflected in the current stormwater permit. The two outfalls have identical monitoring and reporting requirements. However, we recommend modification of the permit to be reflective of the current activities at the site.

2. Section 2.5 (Outfall #007)

This section proposes a sweeper and pressurized water sprayer and vacuum system to clean the concrete pad area in front of the transfer station. It is not detailed where the water from this cleaning would be disposed. This water is not authorized for discharge under the current stormwater permit. To discharge the water you would need to modify the permit with a new public notice/comment period. If it is not authorized through the permit, then the water must be



Recycled paper

collected and sent to a wastewater treatment facility. Please clarify how this waste water would be disposed.

3. Section 2.5 (Outfall #007)

It appears that a number of proposed improvements involve activity in close proximity to, or potentially affecting the sampling results of U. S. Environmental Protection Agency (EPA) monitored outfalls. One improvement, in particular, described in Section 2.5, 2.c., discusses regrading an area of the outbound lane near the existing stormwater inlet. The area containing the stormwater inlet is covered in non-combustible material (rock) that was placed there to cover radiologically impacted material at and near the surface. Notification and/or coordination with EPA on some of these best management practices is recommended. Mr. Ryan Seabaugh in the Department's Hazardous Waste Program Federal Facilities Section can coordinate if desired, or you may contact Ms. Christine Jump with EPA Region 7 at 913-551-7141 or Jump.Chris@epa.gov.

4. Figure #1 (Site map)

Outfall #008 doesn't match its location in the permit document very well. It's close, but not quite right. In addition, this drawing is still marked draft. Please revise Figure #1 accordingly.

5. Basins

There was not an evaluation of the basins included in the report. The site may want to consider the frequency of maintenance/sludge removal of the stormwater basins. It is generally advised to scoop the sediment from these ponds no less than every 5 to 10 years, or more frequently depending on the amount of sediment and water they receive. Sediment accumulation should be no more than 6-12 inches.

6. Site Map

It is not required, but an area map outlining the drainage area of each outfall would be helpful to go along with the description.

7. Outfall Infrastructure

A drawing showing all associated infrastructure for each outfall (i.e. ditches, swales, basins, etc.) would be helpful in understanding stormwater flow patterns.

Ms. Erin Fanning
Bridgeton Landfill
Page 3

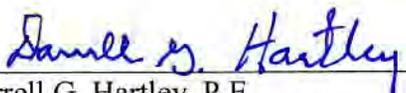
8. Section 1.2, Outfall #9

Please note, the Department's Hazardous Waste Program Federal Facilities Section can provide 2 documented sample results for the 2nd quarter 2017 for Outfall #9 - one for sampling on April 5, 2017, and one on May 3, 2017, if this information would be helpful in completing the assessment of Outfall #9.

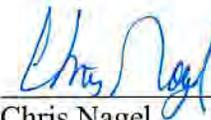
If you have any questions or comments regarding this letter, please contact Mr. J.P. Boessen at 573-751-5401 or P.O. Box 176, Jefferson City, MO 65102-0176. Thank you.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



Darrell G. Hartley, P.E.
Chief, Permits Unit



Chris Nagel
Director

DGH:jbl

c: Daniel R. Koziatek, P.E., Civil and Environmental Consultants, Inc.
Mark Milward, R.G., St. Louis County Department of Public Health
Mr. Mike Parris, Chief, Compliance/Enforcement Section, SWMP
St. Louis Regional Office