



June 12, 2015  
File: 182608020

Leanne Tippet Mosby, Director  
Division of Environmental Quality  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102-0176

Dear Ms. Mosby,

**Reference: Bridgeton Landfill, LLC. Request to Reduce Sampling**

Stantec Consulting Services, Inc. (Stantec) has prepared this brief letter in support of Bridgeton Landfill, LLC (Bridgeton) request to reduce the scope of the upcoming comprehensive sampling event scheduled to occur in July 2015, as specified by the 2<sup>nd</sup> Amendment to the First Agreed Order of Preliminary Injunction (June 19, 2014). This will be the fifth such comprehensive sampling of ambient air and landfill source gas to be conducted at Bridgeton. Results from the comprehensive sampling events conducted in August 2012, April/May 2013, July 2014 and January 2015 have been provided to MDNR.

There is a substantial database to support Bridgeton's request to reduce the scope of the July 2015 comprehensive sampling event. This database consists of source gas and ambient air sampling conducted over the past four years by Stantec, MDNR, and Tetra Tech (consultant to USEPA) as part of the West Lake Landfill investigation. The sampling events and programs that support Bridgeton's request include the following.

Stantec

- Four comprehensive sampling events were conducted in August 2012, April/May 2013, July 2014 and January 2015. Samples of source gas, and ambient air upwind, downwind at the facility fence line and at locations on the landfill were analyzed for an extensive list of parameters.
- Additional sampling of ambient air was conducted in 2013 to address concerns about potential exposures at the Metropolitan Sewer District Lift Station and the Pattonville School.

MDNR

- Starting in May 2013 and ongoing as of this date, MDNR has conducted a community air monitoring program consisting of AreaRAE® monitoring units at three locations near



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Bridgeton Landfill; observations of odors, direct-reading instrument measurements of hydrogen sulfide and benzene concentrations along a "Daily Monitoring Path"; and weekly analysis of ambient air at locations upwind and downwind of the landfill for volatile organic compounds by EPA Method TO-15. There are thousands of observations in the MDNR database.

USEPA/Tetra Tech

- In preparation for remedial activities at the West Lake Landfill, Tetra Tech conducted community air monitoring during calendar year 2014.

The extensive database compiled by Stantec, MDNR and USEPA/Tetra Tech provides evidence that the remedial actions implemented at Bridgeton since 2012 have effectively reduced ways that constituents of concern in the source gas can be released to ambient air and travel to the surrounding community. No constituents plausibly associated with landfill source gas have been detected at levels of potential concern in the surrounding community.

Continued sampling for constituents of concern that have never been detected in landfill source gas and/or constituents that are frequently detected in ambient air as a result of local and regional sources will not provide useful information about potential exposures to the surrounding community that can be attributed (at least in part) to releases of reaction gas from the landfill.

***Sampling for the following constituents should be discontinued: fixed gases; ammonia; mercury and compounds; hydrogen cyanide; aldehydes; amines; polycyclic aromatic hydrocarbons (PAHs); and polychlorinated dibenzo-p-dioxins and dibenzofurans (dioxins/dibenzofurans).***

***The upcoming July 2015 event should focus on volatile organic compounds, (VOCs) particularly benzene; reduced sulfur compounds, and carboxylic acids.*** These are the constituents of concern present in the landfill source gas that are of potential concern to public health (benzene) and are likely to be associated with the odor (reduced sulfur compounds and carboxylic acids).



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We appreciate your consideration. Please let us know if we can provide any additional information to support Bridgeton's request to reduce the scope of the upcoming July 2015 sampling event.

Respectfully,

**Stantec Consulting Services Inc.**

Handwritten signature of Deborah L. Gray in black ink.

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Handwritten signature of Gerald R. Myers in black ink.

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c. Bob Lambrechts, Esq., Lathrop & Gage, LLP  
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