Sewer Acct.#: **1003803000**

Company: **BRIDGETON LANDFILL LLC**

Address: **13570 St. Charles Rock Road**

City: **Bridgeton**

State and Zip: **MO 63044**

Industry ID	File Code	File Description
17941	41	PERMIT OVERFLOW

ACCOUNT NUMBER: **10038030-00**

COMPANY NAME: **BRIDGETON LANDFILL LLC (R)**

CORRESPONDENCE

FROM **06-12-00** THRU **02-06-15**

X	CORRESPONDANCE LOCATED IN OVERFLOW INDUSTRY FILE

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

February 26, 2015

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - 1.1
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Brian Power:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on September 01, 2014, for the above premise, is hereby revised as per the attached revised permit.

The following revisions were made to the permit:

- The daily average discharge limit for Arsenic (Total) at Sample Point 013 has been changed to 0.77 mg/L, and further described under new Special Condition F.1.
- Monitoring requirements in concentration for Uranium (Total) at Sample Point 013 have been added. This is in addition to the monitoring requirements in radioactivity units for Uranium (Total) at Sample Point 013.
- Reporting requirements for Uranium (Total) in radioactivity units have been clarified under new Special Condition C.4, specifying that it shall consist of the summation of Uranium-234, Uranium-235, and Uranium-238 isotopes. The former Special Condition C.4 has been renumbered as C.5.
- Special Condition D.2 for reporting Wastewater Discharged On-Site at Sample Point 013, has been revised to have monthly reports sent to MSD's Division of Environmental Compliance at 10 East Grand Avenue.
- Special Conditions B.4 and C.2 have been reworded to clarify notification and discharge procedures for contaminated storm water.

We have reissued the entire permit for your convenience. Please replace your prior permit with this letter and the revised permit. The terms of the revised permit supersede your prior permit.

You must submit monitoring reports on a quarterly basis, as required by the conditions of this permit. The necessary report form is appended to the permit. It includes the specific certifications required by your permit. Please use this form for your report submittals.

This revision does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and in no way relieves you of your obligations to achieve the discharge limitations as provided in the permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8717, if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures: Industrial Wastewater Discharge Permit, Self-monitoring Report Form

cc: Chris Bulmahn
Tom Boehm
Cynthia Chalk

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
HAULED & INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1003803000 - 1.1

EFFECTIVE DATE: February 06, 2015
EXPIRATION DATE: August 31, 2019

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 013, 014

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 12559, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Chris Bulmann
Associate Engineer

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 013

SAMPLING POINT LOCATION: Manhole immediately upstream of junction manhole to pump stations for Missouri River plant, or for sewer extension line to other MSD treatment plants

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate (Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown (Transfer station & jetter trucks) + Storm Water (Contaminated from leachate spills) + Cooling Tower Blowdown

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/mo
Temperature [Deg C]	60	Instant	Once/mo
pH [SU]	11.5	Instant	Once/mo
pH [SU]	5.5	Instant	Once/mo
Transmittance Unfiltered	*****	Daily Avg	Once/mo
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma	*****	Daily Avg	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Uranium-natural [pci/L]	3000	Monthly Avg	Once/3 mo
Arsenic (Total) [mg/L]	0.77	Daily Avg	Once/3 mo
Benzene [mg/L]	0.14	Instant	Once/3 mo
Cadmium (Total) [mg/L]	0.7	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5.0	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Iron (Total) [mg/L]	150	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	0.4	Daily Avg	Once/3 mo
Magnesium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Mercury (Total) [mg/L]	0.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Silver (Total) [mg/L]	0.5	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3.0	Daily Avg	Once/3 mo
Total Phenols [mg/L]	21.0	Instant	Once/3 mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/3 mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring requirement only

DISCHARGE LIMITATIONS FOR HAULED WASTE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 014

SAMPLING POINT LOCATION: Truck loading stations at 316K gallon equalization tank or 1 M gallon biological treatment tanks

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Total Suspended Solids	****	Daily Avg	Once/mo
Temperature	****	Daily Avg	Once/mo
pH	****	Daily Avg	Once/mo
Ammonia (as N)	****	Daily Avg	Once/3 mo
Gross Alpha	****	Daily Avg	Once/3 mo
Gross Beta	****	Daily Avg	Once/3 mo
Gross Gamma	****	Daily Avg	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Uranium-natural [pci/L]	3000	Monthly Avg	Once/3 mo
Arsenic (Total)	****	Daily Avg	Once/3 mo
Benzene [mg/L]	0.14	Instant	Once/3 mo
Cadmium (Total)	****	Daily Avg	Once/3 mo
Chromium (Total)	****	Daily Avg	Once/3 mo
Copper (Total)	****	Daily Avg	Once/3 mo
Iron (Total)	****	Daily Avg	Once/3 mo
Lead (Total)	****	Daily Avg	Once/3 mo
Magnesium (Total)	****	Daily Avg	Once/3 mo
Mercury (Total)	****	Daily Avg	Once/3 mo
Nickel (Total)	****	Daily Avg	Once/3 mo
Oil and Grease (Total)	****	Daily Avg	Once/3 mo
Silver (Total)	****	Daily Avg	Once/3 mo
Zinc (Total)	****	Daily Avg	Once/3 mo
Total Phenols	****	Daily Avg	Once/3 mo
Total Toxic Organics	****	Daily Avg	Once/3 mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** Monitoring requirement only

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by April 28, 2015.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to

continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 12559 and 13701 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559 and District Hauled Waste Ordinance 13701.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. PROHIBITED DISCHARGES

A.1. On Site Discharge Prohibited Prior to District Approval of Pretreatment Plant

Discharge of wastewater through the on site sewer (sampling point **013**) shall be prohibited prior to the District's declaration of acceptance of the permittee's pretreatment plant operational conditions.

A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point **014** (or otherwise haul to the District) must be approved for discharge separately by the District prior to hauling to District treatment plants and discharging.

Subsequent to the District's declaration of the permittee's pretreatment plant operational acceptance, for all wastewater that has not received full treatment through the permittee's pretreatment plant and that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District), the permittee shall give prior notification to the District and shall follow the applicable requirements for the District's April 24, 2013 approval and subsequent modifications.

A.3. Special Biochemical Oxygen Demand Limitation

In addition to complying with all permit and applicable District ordinance prohibitions against the discharge of any pollutant released at a concentration which will cause interference with the operation of the wastewater system, the permittee shall not discharge through sampling point **013**, at any time, wastewater with a daily mass of greater than 4,300 lb/day biochemical oxygen demand. This limitation in no way gives separate approval to or reservation for permittee of wastewater discharges with a biochemical oxygen demand above its long term average discharge levels.

A.4. Discharge Prohibited or Restricted to Protect District

Discharge of wastewater to particular District treatment plants shall be prohibited when the District so declares those plants as prohibited from receiving the permittee's wastewater. Alternately, discharge of wastewater to particular District treatment plants may be restricted by the District to certain volume or loading restrictions. Such declarations shall not be made by the District without cause, such as to prevent violations by the permittee of District Ordinance 12559 or other applicable ordinances.

Of particular note:

1. Discharge of wastewater to the District's Missouri River treatment plant shall be prohibited or limited when the permittee's wastewater has an ultraviolet transmittance percentage at a level that would interfere with proper ultraviolet disinfection at the treatment plant. At a minimum, from the first day of March through the last day of October in a calendar year, discharge to the treatment plant will be prohibited or limited.
2. Discharge of wastewater to any of the District's treatment plants shall be prohibited or limited when the permittee's wastewater has a biochemical oxygen demand concentration at a level that would interfere with proper biological treatment at the treatment plants.

A.5. Hazardous Hauled Wastes

Pursuant to District Ordinance 13701, Section 2.B, under no circumstance may hauled waste which is hazardous waste, as defined in 40 CFR 261 or 10 CSR 25-4.261, be discharged to District facilities. The permittee shall certify on each quarterly self-monitoring report that the permittee has not discharged any hazardous hauled waste.

B. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

B.1. Sampling/Reporting Requirement for Ordinance Total Phenols

Analysis for Total Phenols is to be performed using EPA Method 625. The result to be reported is the arithmetic sum of the concentrations found for the following individual phenolic compounds:

4-chloro-3-methylphenol	4,6-dinitro-2-methylphenol	pentachlorophenol
2-chlorophenol	2,4-dinitrophenol	phenol
2,4-dichlorophenol	2-nitrophenol	2,4,6-trichlorophenol
2,4-dimethylphenol	4-nitrophenol	

As an option, prior to performing the Method 625 analysis, an initial screening may be performed using EPA Method 420.1. If this option is chosen, two separate samples must be collected, one preserved for the method 420.1 analysis and one unpreserved for a method 625 analysis, if necessary. If the screening produces a result which is less than the permit limitation for Total Phenols, the result should be reported as "less than (numerical result)", and the Method 625 analysis need not be performed. If Method 420.1 produces a result which is greater than the permit limitation, the unpreserved sample must be analyzed using Method 625 and the Method 625 result must be reported. Note: The screening analysis must be completed and a result obtained within sufficient time to ensure the Method 625 analysis, if required, can begin within the 7 day holding time of the unpreserved sample.

B.2. Sampling/Reporting Requirement for Total Toxic Organics

The permittee shall sample and report Total Toxic Organics using at a minimum EPA Methods 624 and 625, or equivalent. Other EPA Methods may be necessary to analyze for toxic organics which are or may be present in the discharge. As part of the Total Toxic Organics report, the permittee shall report all volatile and semi-volatile organics which EPA methods 624 and 625, or equivalent, scan for, as well as all organics which other methods used scan for, and the sum of all quantifiable values greater than 0.01 mg/l.

B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and acceptance procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of plant acceptance, the permittee's discharge will be sampled for the parameters listed under sampling point 013 as follows:

1. Once/day for the first 30 calendar days. This sample of fully treated leachate may be collected from an internal sampling point prior to entry into the approved storage tank; however at least the final three samples must be collected from an approved tank.
2. At the end of the 30 day period, if analytical results are obtained for at least the final 7 consecutive days at or below the limits contained in the permit for on site discharge, or in District Ordinance 12559 if not contained in the permit, sampling will continue on a once/week schedule for the next three months.
3. Should analytical results from once/week sampling meet the discharge limits for three consecutive months, sampling will continue at a once/month frequency for the following six months.

4. Should analytical results from once/month sampling meet the discharge limits for six consecutive months, sampling will continue at the frequencies defined in the permit.

Should a sample fail to meet the discharge limit for any parameter, the sampling frequency will revert to the next more frequent sampling interval listed above. Reversion to next more frequent sampling interval shall only apply to the parameter failing to meet its discharge limit. Reversion shall continue for the period specified for the initial sampling frequency reductions.

At least one of the initial once/day samples shall be analyzed for Gross Alpha, Gross Beta, Gross Gamma, Radium-226, Radium-228, and Uranium.

The sampling intervals listed above shall apply to the permittee's discharge regardless of discharge location to the District, whether on site or hauled.

Sample type and reporting frequency shall be as follows:

Sampling Frequency	Sample Type	Reporting Frequency
Once/day (12:00 am to 12:00 am)	Grab or 24-hr composite	Once/week. Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for activity through the previous Saturday.
Once/week (Sunday to Saturday)	24-hr composite	Once/week. Reports shall be submitted within 2 weeks (14 calendar days) of sampling.
Once/calendar month	24-hr composite	Once/month. Reports shall be submitted within 3 weeks (21 calendar days) of sampling.

All grab samples shall be collected in such a manner as to be as representative as possible of the full daily discharge.

This special condition does not relieve the permittee from any violations of the industrial wastewater discharge permit, nor District Ordinance 12559, nor any other applicable District ordinances. Neither does this special condition relieve the permittee from any other obligations of the industrial wastewater discharge permit, District Ordinance 12559, or any other applicable District ordinances.

B.4. Discharge of Contaminated Storm Water

Permittee is authorized to discharge storm water contaminated with leachate to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

B.5. Operation of Westlake Pump Station Air Handling Equipment

Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

B.6. Additional Hauled Waste Requirements

The District retains the authority to add other analytical and discharge control requirements for hauled waste loads, as deemed necessary, without making a formal modification to the discharge permit.

C. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

C.1. Notification of Change Between On Site and Hauled Discharge

Whenever the permittee becomes aware of its need or desire to change discharge method between sampling point **013** (on site) or sampling point **014** (hauled), or to change distribution between the two methods if both methods are being utilized simultaneously, permittee must immediately notify the District of such need or desire.

C.2. NPDES Discharge Point

This permit does not regulate discharges at MSD sampling points 004 (NPDES 003), 009 (NPDES 004), 010 (NPDES 005), 011 (NPDES 006), or 012 (NPDES 007). These discharges are subject to State regulation under NPDES permit number MO-0112771. Permittee is authorized to discharge storm water contaminated with leachate to the District's sanitary sewer system, subject to special condition B.4. For storm water that is contaminated with material other than leachate, permittee is authorized to route it to the permittee's pretreatment plant, however should the permittee plan to route it directly to District sewers, the permittee shall notify the District's Division of Environmental Compliance at least ten (10) days prior to the date of the planned change.

C.3. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined

(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

C.4. Radioactive Uranium Reporting Requirements

For the purposes of this permit, measurement and reporting of Uranium-natural for radioactivity levels shall consist of the summation of Uranium-234, Uranium-235, and Uranium-238 isotopes.

C.5. Repeated Submittal of Already-Submitted Analytical

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee need not repeat those results on the quarterly self-monitoring report.

D. SPECIAL BILLING REPORTING REQUIREMENTS

D.1. Hauled Waste Discharge Fees

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point **014** (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

For wastewater that has received partial treatment pursuant to Alternative 3 of the Revised Leachate SOP approved August 22, 2014, and any subsequent modifications, MSD will calculate volume and surcharge rates under Ordinance 13758, Appendix 1 using monthly average levels for BOD and TSS. The permittee will be billed this rate except that in no case will the permittee be charged more than provided for in Ordinance 13701 or its successors, presently $0.08/gallon, or less than $0.02/gallon.

In addition, the permittee also will be billed all additional fees and charges incurred by the District (including, wages. salaries, benefits, and operational costs) in receiving wastewater from the permittee discharged through sampling **014** (or otherwise hauled to the District) at times other than during normal business hours as defined in District Ordinance 13701.

D.2. Reporting Wastewater Discharged On Site

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point **013**. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.3. Reporting Hauled Wastewater Discharge

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point **014** (that is, hauled directly to District treatment plants and discharged there). These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.4. BOD in Lieu of COD for Extra-Strength Surcharges

Upon submittal by the permittee, and acceptance by the District, of data indicating that although the BOD/COD (biochemical oxygen demand / chemical oxygen demand) ratio of the permittee's wastewater is less than 0.35, BOD is more representative of the user's actual wastewater strength and the COD in the wastewater discharge does not receive further treatment and reduction by the District beyond that commensurate with the associated BOD in the wastewater discharge, the District will calculate applicable extra-strength surcharges using BOD values in lieu of COD values.

E. DISCHARGE DAMAGES

E.1. Revocation of Hauled Waste Permit

This permit has been issued based upon the information and sample analysis provided by the permittee. The permit may be revoked by the District at any time if any submitted information is found to be incorrect, the discharges cause any operational or maintenance problems with the District's treatment system, or if the conditions and requirements of the permit are violated.

E.2. Responsibility of Damages from Hauled Waste

If any discharge by the permittee causes any operational or maintenance problems within the District's collection or treatment systems or results in violations of any conditions of the District's NPDES permit, the permittee will be responsible for damages, in accordance with applicable District ordinances or other applicable laws.

F. DERIVATION OF LIMITATIONS

F.1. Variance Limits

Pursuant to the provisions of District Sewer Use Ordinance 12559, Article VI, Section Two, the permittee has been granted a variance to the Ordinance limitations for total arsenic at sampling point 013. The permittee shall comply with the alternative limits specified. The alternative limits are effective for the life of this permit but may be revoked at any time if it is determined that discharge at the variance levels is causing or contributing to interference or pass through as defined in Article II of the Ordinance. The variance will expire upon expiration of this permit unless justification for continuance of the alternative limits is provided by the permittee at the time of application for permit renewal.

THIS IS THE LAST PAGE OF THIS PERMIT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: **BRIDGETON LANDFILL LLC**

Permit No: 1003803000 – 1.1 Effective Date: February 06, 2015 Expiration Date: August 31, 2019

Premise Address: 13570 St. Charles Rock Road, Bridgeton, MO 63044

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS**.

O	NO DISCHARGE OF HAZARDOUS HAULED WASTE For permit special conditions that prohibit discharge of hazardous waste to the District, you are required to make the following certification: _____ I certify, since the last discharge monitoring report, there has been no discharge of hazardous waste to the District.

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION **All permittees must sign and complete the information below:** I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____

Bridgeton Landfill
PERMIT FILE

Doug Mendoza

From: Ed Galbraith <EGalbraith@barr.com>
Sent: Wednesday, February 18, 2015 4:44 PM
To: Doug Mendoza
Cc: bpower@republicservices.com; Bouchard, Derek (DBouchard@republicservices.com)
Subject: RE: Bridgeton Landfill draft revised permit revision cover letter
Attachments: BLF Comments on 2015_0210 Permit Modification.pdf

Doug, attached are comments submitted on behalf of Bridgeton Landfill. Please let me know if you have any questions. Thank you.

Ed Galbraith

Senior Environmental Consultant
Jefferson City office: 573.638.5024
cell: 573.418.5562
egalbraith@barr.com
www.barr.com

resourceful. naturally. BARR

From: Doug Mendoza [mailto:DMENDOZA@stlmsd.com]
Sent: Tuesday, February 10, 2015 6:36 AM
To: Power, Brian <BPower@republicservices.com> (BPower@republicservices.com) (BPower@republicservices.com)
Cc: Ed Galbraith
Subject: Bridgeton Landfill draft revised permit revision cover letter

FYI. Hard copy of draft revised permit is being mailed.

From: Margie Irvin
Sent: Monday, February 09, 2015 2:33 PM
To: Christopher J. Bulmahn; Tom Boehm; Cynthia Chalk
Cc: Doug Mendoza
Subject: Bridgeton Landfill permit revision cover letter.docx

February 9, 2015

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - 1.1
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Power:

Bridgeton Landfill, LLC

February 19, 2015

Mr. Doug Mendoza
Industrial Pretreatment Manager
Metropolitan St. Louis Sewer District
10 East Grand Ave.
St. Louis, MO 63147

RE: COMMENTS ON DRAFT REVISED PERMIT (Permit No. 1003803000 – 1.1)

Thank you for the opportunity to review the draft revised permit, provided electronically by Email on February 10, 2015. We offer the following comments.

Page 1: We request that the effective date be made February 6, 2015 to coincide with the resumption of discharge on that date.

Page 2: "Uranium (Total)[mg/l]" has been added to the permit. We concur with this change.

Page 2: As you noted in a subsequent Email, "Uranium (Total)[pCi/l]" should be changed to "Uranium (Natural)[pCi/l]" distinguish the concentration-based monitoring data from the radioactivity-based monitoring data..

Page 2: The limitation for Arsenic (Total) has been changed to 0.77 mg/l. We concur with this change.

Page 3: We offer the same comments as noted for Page 2 with regard to Uranium (Total) and Uranium (Natural).

Page 10: At Condition H., the reference to District Ordinance 13701 has been removed. We are concerned that the coverages of the Hauled Waste Ordinance may be removed if this change becomes final. We would like to further understand the reasoning for this change.

Page 10: At Condition L, the reference to District Ordinance 13701 has been removed. Our comment is similar to the comment under Condition H.

Page 13: At Condition B.5, in the heading, change "Eq" to "Equipment."

Page 14: At Condition C.2., the third sentence could conflict with the requirements of Condition B.4. It could also be construed to require notification if the stormwater were directed to the leachate pretreatment system. We suggest removing the third sentence since this situation is addressed in B.4.

Page 14: At Condition C.4., replace "Total" with "Natural."

Page 15: At Condition D.2., the address has been changed. We concur with this change.

Page 15: At Condition D.2., the sentence "Alternately, the reports may be submitted electronically via mutually-agreed method" has been removed. We suggest that it be restored, so as to continue the current electronic reporting procedure.

Page 16: Condition F.1. has been added as follows:

> Pursuant to the provisions of District Sewer Use Ordinance 12559, Article VI, Section Two, the permittee has been granted a variance to the Ordinance limitations for total arsenic at sampling point 013. The permittee shall comply with the alternative limits specified. The alternative limits are effective for the life of this permit but may be revoked at any time if it is determined that discharge at the variance levels is causing or contributing to interference or pass through as defined in Article II of the Ordinance. The variance will expire upon expiration of this permit unless justification for continuance of the alternative limits is provided by the permittee at the time of application for permit renewal.

We concur with this addition.

If you have any questions, feel free to contact me at (314) 744-8165.

Sincerely,

Brian J. Power

Brian Power
Environmental Manager

Doug Mendoza

From: Doug Mendoza
Sent: Tuesday, February 10, 2015 6:36 AM
To: Power, Brian <BPower@republicservices.com> (BPower@republicservices.com) (BPower@republicservices.com)
Cc: Ed Galbraith (EGalbraith@barr.com) (EGalbraith@barr.com)
Subject: Bridgeton Landfill draft revised permit revision cover letter

FYI. Hard copy of draft revised permit is being mailed.

From: Margie Irvin
Sent: Monday, February 09, 2015 2:33 PM
To: Christopher J. Bulmahn; Tom Boehm; Cynthia Chalk
Cc: Doug Mendoza
Subject: Bridgeton Landfill permit revision cover letter.docx

February 9, 2015

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - 1.1
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Power:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on September 01, 2014, for the above premise, is being revised as per the attached draft revised permit.

The following revisions were made to the permit:

- The daily average discharge limit for Arsenic (Total) at Sample Point 013 has been changed to 0.77 mg/L, and further described under new Special Condition F.1.
- Monitoring requirements in concentration for Uranium (Total) at Sample Point 013 have been added. This is in addition to the monitoring requirements in radioactivity units for Uranium (Total) at Sample Point 013.
- Reporting requirements for Uranium (Total) in radioactivity units have been clarified under new Special Condition C.4, specifying that it shall consist of the summation of Uranium-234, Uranium-235, and Uranium-238 isotopes. The former Special Condition C.4 has been renumbered as C.5.
- Special Condition D.2 for reporting Wastewater Discharged On-Site at Sample Point 013, has been revised to have monthly reports sent to MSD's Division of Environmental Compliance at 10 East Grand Avenue.

We have reissued the entire permit for your convenience. Please review this draft copy carefully. If you disagree with any of the terms or conditions of the proposed permit please inform us, in writing, within 15 working days of receipt. MSD will deem absence of a response within this period as acceptance of the draft permit, and we will proceed to issue the final permit.

You must submit monitoring reports on a quarterly basis, as required by the conditions of this permit. The necessary report form is appended to the permit. It includes the specific certifications required by your permit. Please use this form for your report submittals.

This revision does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and in no way relieves you of your obligations to achieve the discharge limitations as provided in the permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8717, if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures: Industrial Wastewater Discharge Permit, Self-monitoring Report Form

cc: Chris Bulmahn
Tom Boehm
Cynthia Chalk

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

February 9, 2015

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - 1.1
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Power:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on September 01, 2014, for the above premise, is being revised as per the attached draft revised permit.

The following revisions were made to the permit:

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- Reporting requirements for Uranium (Total) in radioactivity units have been clarified under new Special Condition C.4, specifying that it shall consist of the summation of Uranium-234, Uranium-235, and Uranium-238 isotopes. The former Special Condition C.4 has been renumbered as C.5.
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We have reissued the entire permit for your convenience. Please review this draft copy carefully. If you disagree with any of the terms or conditions of the proposed permit please inform us, in writing, within 15 working days of receipt. MSD will deem absence of a response within this period as acceptance of the draft permit, and we will proceed to issue the final permit.

You must submit monitoring reports on a quarterly basis, as required by the conditions of this permit. The necessary report form is appended to the permit. It includes the specific certifications required by your permit. Please use this form for your report submittals.

This revision does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and in no way relieves you of your obligations to achieve the discharge limitations as provided in the permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8717, if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures: Industrial Wastewater Discharge Permit, Self-monitoring Report Form

cc: Chris Bulmahn
Tom Boehm
Cynthia Chalk

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1003803000 - 1.1

EFFECTIVE DATE: March 01, 2015
EXPIRATION DATE: August 31, 2019

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 013, 014

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 12559, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Chris Bulmahn
Associate Engineer

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

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DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 013

SAMPLING POINT LOCATION: Manhole immediately upstream of junction manhole to pump stations for Missouri River plant, or for sewer extension line to other MSD treatment plants

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate (Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown (Transfer station & jetter trucks) + Storm Water (Contaminated from leachate spills) + Cooling Tower Blowdown

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/mo
Temperature [Deg C]	60	Instant	Once/mo
pH [SU]	11.5	Instant	Once/mo
pH [SU]	5.5	Instant	Once/mo
Transmittance Unfiltered	*****	Daily Avg	Once/mo
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma	*****	Daily Avg	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Arsenic (Total) [mg/L]	0.77	Daily Avg	Once/3 mo
Benzene [mg/L]	0.14	Instant	Once/3 mo
Cadmium (Total) [mg/L]	0.7	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5.0	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Iron (Total) [mg/L]	150	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	0.4	Daily Avg	Once/3 mo
Magnesium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Mercury (Total) [mg/L]	0.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Silver (Total) [mg/L]	0.5	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3.0	Daily Avg	Once/3 mo
Total Phenols [mg/L]	21.0	Instant	Once/3 mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/3 mo

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* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring requirement only

DRAFT

DISCHARGE LIMITATIONS FOR HAULED WASTE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 014

SAMPLING POINT LOCATION: Truck loading stations at 316K gallon equalization tank or 1 M gallon biological treatment tanks

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Total Suspended Solids	****	Daily Avg	Once/mo
Temperature	****	Daily Avg	Once/mo
pH	****	Daily Avg	Once/mo
Ammonia (as N)	****	Daily Avg	Once/3 mo
Gross Alpha	****	Daily Avg	Once/3 mo
Gross Beta	****	Daily Avg	Once/3 mo
Gross Gamma	****	Daily Avg	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Arsenic (Total)	****	Daily Avg	Once/3 mo
Benzene [mg/L]	0.14	Instant	Once/3 mo
Cadmium (Total)	****	Daily Avg	Once/3 mo
Chromium (Total)	****	Daily Avg	Once/3 mo
Copper (Total)	****	Daily Avg	Once/3 mo
Iron (Total)	****	Daily Avg	Once/3 mo
Lead (Total)	****	Daily Avg	Once/3 mo
Magnesium (Total)	****	Daily Avg	Once/3 mo
Mercury (Total)	****	Daily Avg	Once/3 mo
Nickel (Total)	****	Daily Avg	Once/3 mo
Oil and Grease (Total)	****	Daily Avg	Once/3 mo
Silver (Total)	****	Daily Avg	Once/3 mo
Zinc (Total)	****	Daily Avg	Once/3 mo
Total Phenols	****	Daily Avg	Once/3 mo
Total Toxic Organics	****	Daily Avg	Once/3 mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published

DRAFT

limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** Monitoring requirement only

DRAFT

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

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4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by April 28, 2015.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written

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report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and

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shall abide by all of the provisions of District Ordinance 12559 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE ORDINANCE

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

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SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. PROHIBITED DISCHARGES

A.1. On Site Discharge Prohibited Prior to District Approval of Pretreatment Plant

Discharge of wastewater through the on site sewer (sampling point **013**) shall be prohibited prior to the District's declaration of acceptance of the permittee's pretreatment plant operational conditions.

A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point **014** (or otherwise haul to the District) must be approved for discharge separately by the District prior to hauling to District treatment plants and discharging.

Subsequent to the District's declaration of the permittee's pretreatment plant operational acceptance, for all wastewater that has not received full treatment through the permittee's pretreatment plant and that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District), the permittee shall give prior notification to the District and shall follow the applicable requirements for the District's April 24, 2013 approval and subsequent modifications.

A.3. Special Biochemical Oxygen Demand Limitation

In addition to complying with all permit and applicable District ordinance prohibitions against the discharge of any pollutant released at a concentration which will cause interference with the operation of the wastewater system, the permittee shall not discharge through sampling point **013**, at any time, wastewater with a daily mass of greater than 4,300 lb/day biochemical oxygen demand. This limitation in no way gives separate approval to or reservation for permittee of wastewater discharges with a biochemical oxygen demand above its long term average discharge levels.

A.4. Discharge Prohibited or Restricted to Protect District

Discharge of wastewater to particular District treatment plants shall be prohibited when the District so declares those plants as prohibited from receiving the permittee's wastewater. Alternately, discharge of wastewater to particular District treatment plants may be restricted by the District to certain volume or loading restrictions. Such declarations shall not be made by the District without cause, such as to prevent violations by the permittee of District Ordinance 12559 or other applicable ordinances.

Of particular note:

1. Discharge of wastewater to the District's Missouri River treatment plant shall be prohibited or limited when the permittee's wastewater has an ultraviolet transmittance percentage at a level that would interfere with proper ultraviolet disinfection at the treatment plant. At a minimum, from the first day of March through the last day of October in a calendar year, discharge to the treatment plant will be prohibited or limited.
2. Discharge of wastewater to any of the District's treatment plants shall be prohibited or limited when the permittee's wastewater has a biochemical oxygen demand concentration at a level that would interfere with proper

biological treatment at the treatment plants.

A.5. Hazardous Hauled Wastes

Pursuant to District Ordinance 13701, Section 2.B, under no circumstance may hauled waste which is hazardous waste, as defined in 40 CFR 261 or 10 CSR 25-4.261, be discharged to District facilities. The permittee shall certify on each quarterly self-monitoring report that the permittee has not discharged any hazardous hauled waste.

B. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

B.1. Sampling/Reporting Requirement for Ordinance Total Phenols

Analysis for Total Phenols is to be performed using EPA Method 625. The result to be reported is the arithmetic sum of the concentrations found for the following individual phenolic compounds:

4-chloro-3-methylphenol	4,6-dinitro-2-methylphenol	pentachlorophenol
2-chlorophenol	2,4-dinitrophenol	phenol
2,4-dichlorophenol	2-nitrophenol	2,4,6-trichlorophenol
2,4-dimethylphenol	4-nitrophenol	

As an option, prior to performing the Method 625 analysis, an initial screening may be performed using EPA Method 420.1. If this option is chosen, two separate samples must be collected, one preserved for the method 420.1 analysis and one unpreserved for a method 625 analysis, if necessary. If the screening produces a result which is less than the permit limitation for Total Phenols, the result should be reported as "less than (numerical result)", and the Method 625 analysis need not be performed. If Method 420.1 produces a result which is greater than the permit limitation, the unpreserved sample must be analyzed using Method 625 and the Method 625 result must be reported. Note: The screening analysis must be completed and a result obtained within sufficient time to ensure the Method 625 analysis, if required, can begin within the 7 day holding time of the unpreserved sample.

B.2. Sampling/Reporting Requirement for Total Toxic Organics

The permittee shall sample and report Total Toxic Organics using at a minimum EPA Methods 624 and 625, or equivalent. Other EPA Methods may be necessary to analyze for toxic organics which are or may be present in the discharge. As part of the Total Toxic Organics report, the permittee shall report all volatile and semi-volatile organics which EPA methods 624 and 625, or equivalent, scan for, as well as all organics which other methods used scan for, and the sum of all quantifiable values greater than 0.01 mg/l.

B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and acceptance procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of plant acceptance, the permittee's discharge will be sampled for the parameters listed under sampling point 013 as follows:

1. Once/day for the first 30 calendar days. This sample of fully treated leachate may be collected from an internal sampling point prior to entry into the approved storage tank; however at least the final three samples must be collected from an approved tank.
2. At the end of the 30 day period, if analytical results are obtained for at least the final 7 consecutive days at or below the limits contained in the permit for on site discharge, or in District Ordinance 12559 if not contained in the permit, sampling will continue on a once/week schedule for the next three months.

3. Should analytical results from once/week sampling meet the discharge limits for three consecutive months, sampling will continue at a once/month frequency for the following six months.
4. Should analytical results from once/month sampling meet the discharge limits for six consecutive months, sampling will continue at the frequencies defined in the permit.

Should a sample fail to meet the discharge limit for any parameter, the sampling frequency will revert to the next more frequent sampling interval listed above. Reversion to next more frequent sampling interval shall only apply to the parameter failing to meet its discharge limit. Reversion shall continue for the period specified for the initial sampling frequency reductions.

At least one of the initial once/day samples shall be analyzed for Gross Alpha, Gross Beta, Gross Gamma, Radium-226, Radium-228, and Uranium.

The sampling intervals listed above shall apply to the permittee's discharge regardless of discharge location to the District, whether on site or hauled.

Sample type and reporting frequency shall be as follows:

Sampling Frequency	Sample Type	Reporting Frequency
Once/day (12:00 am to 12:00 am)	Grab or 24-hr composite	Once/week. Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for activity through the previous Saturday.
Once/week (Sunday to Saturday)	24-hr composite	Once/week. Reports shall be submitted within 2 weeks (14 calendar days) of sampling.
Once/calendar month	24-hr composite	Once/month. Reports shall be submitted within 3 weeks (21 calendar days) of sampling.

All grab samples shall be collected in such a manner as to be as representative as possible of the full daily discharge.

This special condition does not relieve the permittee from any violations of the industrial wastewater discharge permit, nor District Ordinance 12559, nor any other applicable District ordinances. Neither does this special condition relieve the permittee from any other obligations of the industrial wastewater discharge permit, District Ordinance 12559, or any other applicable District ordinances.

B.4. Discharge of Contaminated Storm Water

Permittee is authorized to discharge contaminated storm water to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

B.5. Operation of Westlake Pump Station Air Handling Eq

Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

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B.6. Additional Hauled Waste Requirements

The District retains the authority to add other analytical and discharge control requirements for hauled waste loads, as deemed necessary, without making a formal modification to the discharge permit.

C. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

C.1. Notification of Change Between On Site and Hauled Discharge

Whenever the permittee becomes aware of its need or desire to change discharge method between sampling point **013** (on site) or sampling point **014** (hauled), or to change distribution between the two methods if both methods are being utilized simultaneously, permittee must immediately notify the District of such need or desire.

C.2. NPDES Discharge Point

This permit does not regulate discharges at MSD sampling points 004 (NPDES 003), 009 (NPDES 004), 010 (NPDES 005), 011 (NPDES 006), or 012 (NPDES 007). These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Division of Environmental Compliance at least ten (10) days prior to the date of the planned change.

C.3. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined

(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

C.4. Radioactive Uranium Reporting Requirements

For the purposes of this permit, measurement and reporting of Uranium (Total) for radioactivity levels shall consist of the summation of Uranium-234, Uranium-235, and Uranium-238 isotopes.

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C.5. Repeated Submittal of Already-Submitted Analytical

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee need not repeat those results on the quarterly self-monitoring report.

D. SPECIAL BILLING REPORTING REQUIREMENTS

D.1. Hauled Waste Discharge Fees

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point **014** (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

For wastewater that has received partial treatment pursuant to Alternative 3 of the Revised Leachate SOP approved August 22, 2014, and any subsequent modifications, MSD will calculate volume and surcharge rates under Ordinance 13758, Appendix 1 using monthly average levels for BOD and TSS. The permittee will be billed this rate except that in no case will the permittee be charged more than provided for in Ordinance 13701 or its successors, presently $0.08/gallon, or less than $0.02/gallon.

In addition, the permittee also will be billed all additional fees and charges incurred by the District (including, wages. salaries, benefits, and operational costs) in receiving wastewater from the permittee discharged through sampling **014** (or otherwise hauled to the District) at times other than during normal business hours as defined in District Ordinance 13701.

D.2. Reporting Wastewater Discharged On Site

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point **013**. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.3. Reporting Hauled Wastewater Discharge

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point **014** (that is, hauled directly to District treatment plants and discharged there). These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within

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15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.4. BOD in Lieu of COD for Extra-Strength Surcharges

Upon submittal by the permittee, and acceptance by the District, of data indicating that although the BOD/COD (biochemical oxygen demand / chemical oxygen demand) ratio of the permittee's wastewater is less than 0.35, BOD is more representative of the user's actual wastewater strength and the COD in the wastewater discharge does not receive further treatment and reduction by the District beyond that commensurate with the associated BOD in the wastewater discharge, the District will calculate applicable extra-strength surcharges using BOD values in lieu of COD values.

E. DISCHARGE DAMAGES

E.1. Revocation of Hauled Waste Permit

This permit has been issued based upon the information and sample analysis provided by the permittee. The permit may be revoked by the District at any time if any submitted information is found to be incorrect, the discharges cause any operational or maintenance problems with the District's treatment system, or if the conditions and requirements of the permit are violated.

E.2. Responsibility of Damages from Hauled Waste

If any discharge by the permittee causes any operational or maintenance problems within the District's collection or treatment systems or results in violations of any conditions of the District's NPDES permit, the permittee will be responsible for damages, in accordance with applicable District ordinances or other applicable laws.

F. DERIVATION OF LIMITATIONS

F.1. Variance Limits

Pursuant to the provisions of District Sewer Use Ordinance 12559, Article VI, Section Two, the permittee has been granted a variance to the Ordinance limitations for total arsenic at sampling point 013. The permittee shall comply with the alternative limits specified. The alternative limits are effective for the life of this permit but may be revoked at any time if it is determined that discharge at the variance levels is causing or contributing to interference or pass through as defined in Article II of the Ordinance. The variance will expire upon expiration of this permit unless justification for continuance of the alternative limits is provided by the permittee at the time of application for permit renewal.

THIS IS THE LAST PAGE OF THIS PERMIT

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METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: **BRIDGETON LANDFILL LLC**

Permit No: 1003803000 – 1.1 Effective Date: March 01, 2015 Expiration Date: August 31, 2019

Premise Address: 13570 St. Charles Rock Road, Bridgeton, MO 63044

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

You must complete and sign the certification statements on the second page.

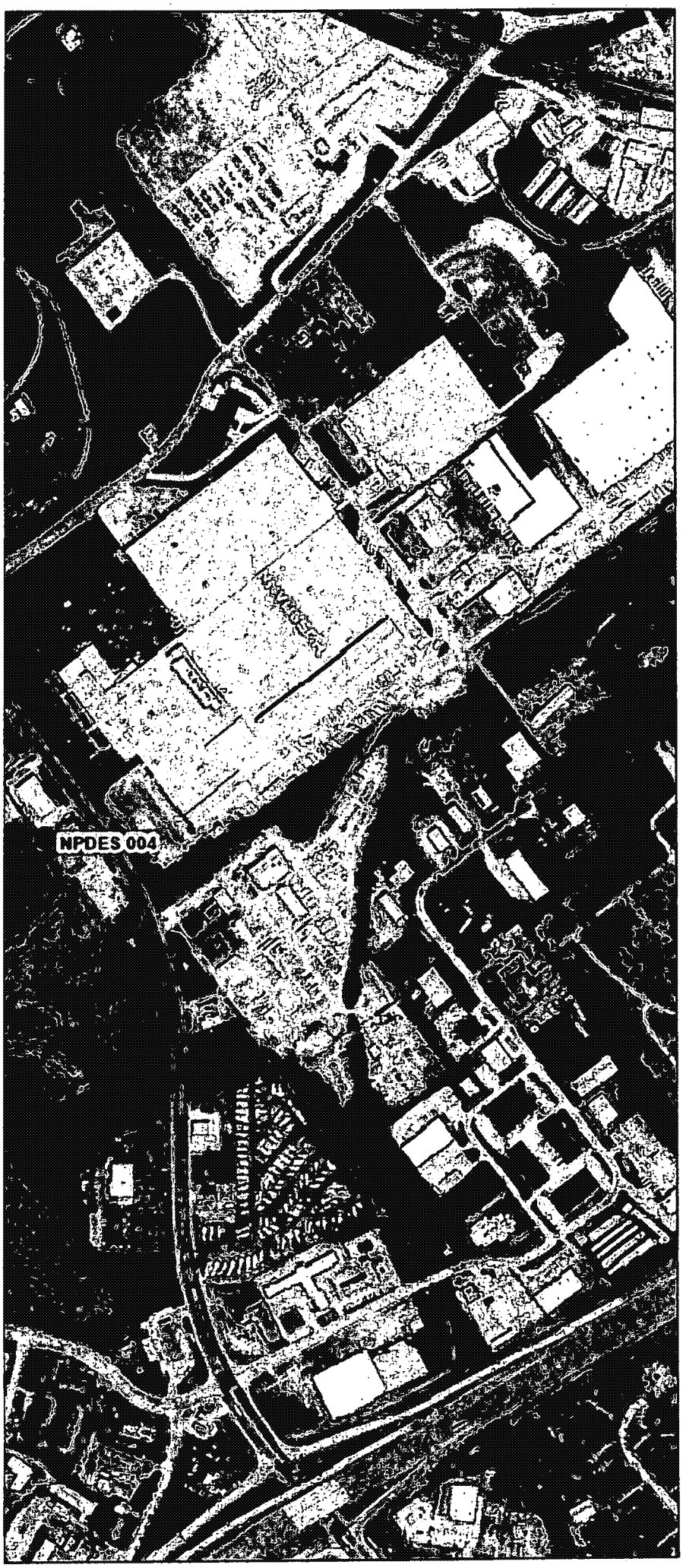
PART III: SPECIAL CERTIFICATION STATEMENTS

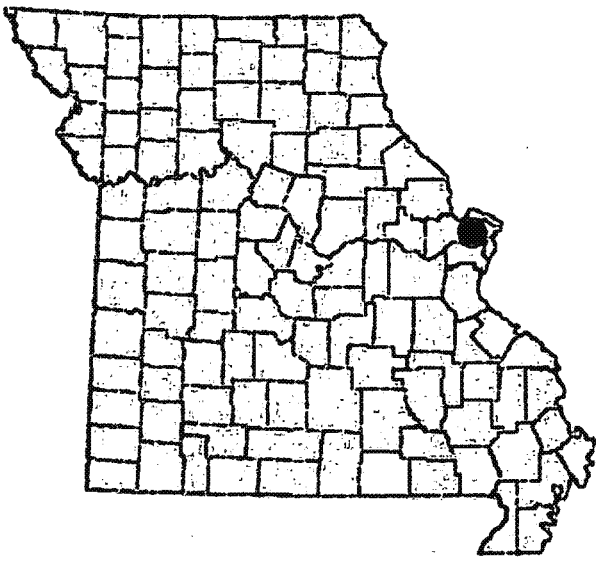
Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS**.

O	NO DISCHARGE OF HAZARDOUS HAULED WASTE
	For permit special conditions that prohibit discharge of hazardous waste to the District, you are required to make the following certification: _____ I certify, since the last discharge monitoring report, there has been no discharge of hazardous waste to the District.

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION
	All permittees must sign and complete the information below: I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____





Legend

- NPDES Outfalls
- MSD Outfalls

N

Feet

500 0 500 1,000

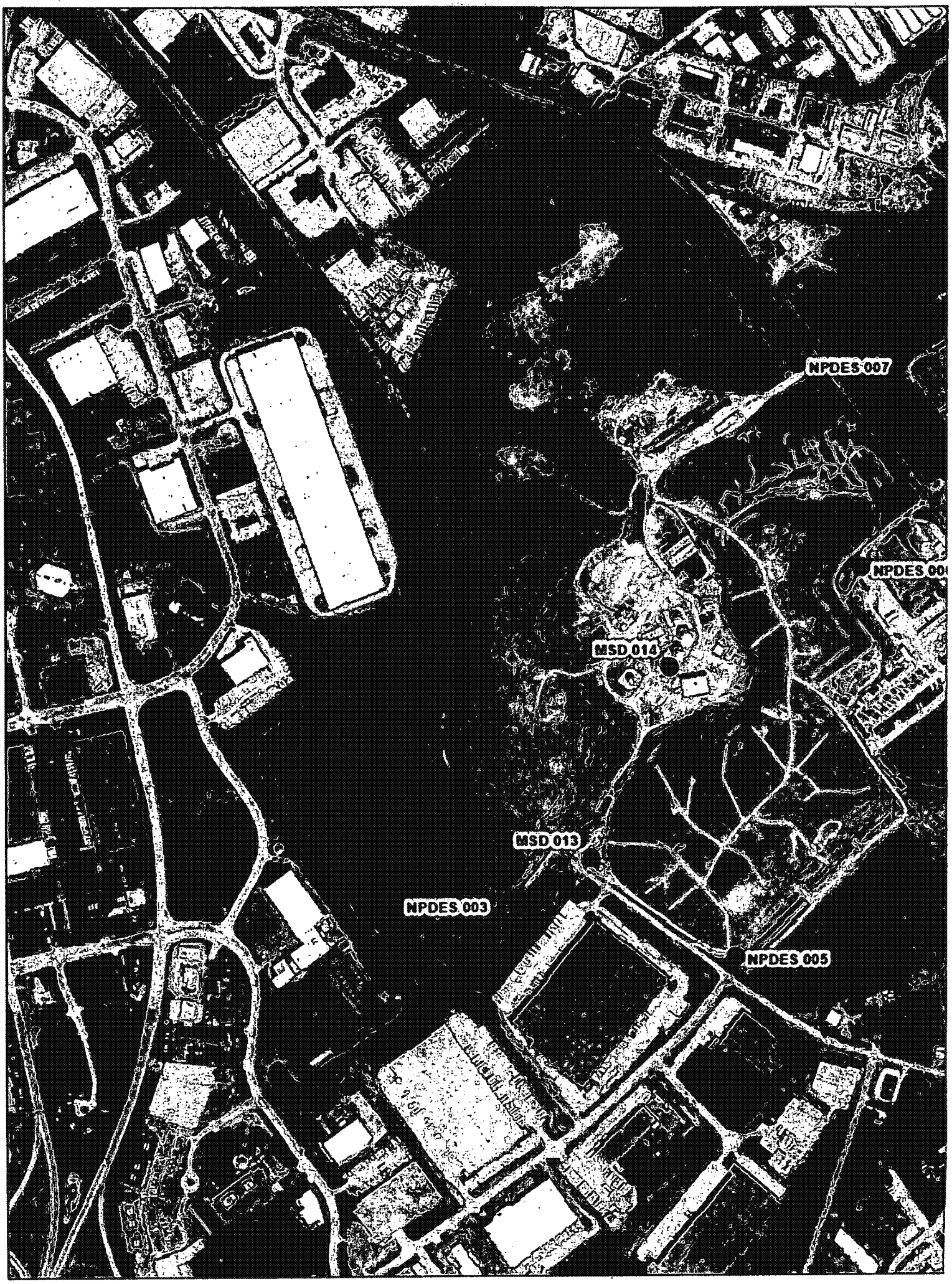
Miles

0.2 0 0.2

BARR

BRIDGETON LANDFILL
NPDES and MSD Discharge Locations

9/02/2014



Document Path: I:\Projects\25\87\1014\Maps\Outfall Map 9-02-14.mxd

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

DOCUMENTATION FORM for PERMIT REVISION

Company Name: **BRIDGETON LANDFILL LLC**

Location: **13570 St. Charles Rock Road**

Former Permit No: **1003803000 - 1** Original Effective Date: **9/1/2014**

Revised Permit No: **1003803000 - 1.1** Revision Effective Date: **3/1/2015**

WHY – Cite regulation, policy, etc. and identify any other documents which support the revision:

1. Company requested and received a variance for arsenic, as described in letter dated 2/6/15.
2. Uranium monitoring is being revised to add concentration-based analyses, and to clarify that radioactivity-based monitoring must include U-234, U-235, and U-238.
3. Changing to ECIS+, DEC will be handlinng the special handling/billing industrial accounts. Reports will now be sent to Division of Environmental Compliance at 10 East Grand Ave., St. Loiuis, MO 63147

WHAT – Briefly explain what is to be revised and then list the pages & how affected:

1. Replaced standard arsenic limit of 0.4 mg/L with 0.77 mg/L. Added associated Special Condition F.2.
2. Added Uranium (Total) monitoring requirement for concentration [mg/L], monitoring requirement only. Added Special Condition C.4 clarifing that radioactivity-based monitoring must include U-234, U-235, and U-238. Renumbered old C.4 to C.5.
3. Updated PIMS Special Condition F.3 to be used that have reports being sent to DEC.

Pg. # 2 **Replaced arsenic limit of 0.4 mg/L with variance limit of 0.77 mg/L at SP013.**

Pg. # 2 **Added uranium [mg/L] monitoring requirement at SP013.**

Pg. # 4 **Added uranium [mg/L] monitoring requirement at SP014.**

Pg. # 14 **Added Special Condition C.4 specify uranium radioactivity-based monitoring must include U-234, U-235, and U-238. Renumbered old C.4 as C.5.**

Pg. # 15 **Changed Special Condition D.2 to show new submittal address for rpt.**

SMR Start Dates for any new requirements:
Once/3 mo: 1/1/2015 or ☐ no new requirements
Once/6 mo: _____ or ☒ no new requirements
Once/year: _____ or ☒ no new requirements

SUPPORTING DOCUMENTS ATTACHED	YES	NO	N/A
"Special Certs & Gen Rpts for Spec Conditions not tied to Specific SPs" Sheet:	☐	☒	
Pollutant & Limitations Documentation Sheets:	☐	☒	☐
Production Based Standards Calculation Sheets: If Yes, for SPs: _____	☐	☒	☐
Most Strict Standards Calculation Sheets: If Yes, for SPs: _____	☐	☒	☐
Combined Wastestream Calculations Sheets: If Yes, for SPs: _____	☐	☒	☐
Text of any Customized Special Conditions: If Yes, for which SCs: _____	☐	☒	☐

Prepared by: Doug Mendoza	Date: 2/9/2015

Doug Mendoza

From: Doug Mendoza
Sent: Tuesday, January 27, 2015 9:31 AM
To: Power, Brian <BPower@republicservices.com> (BPower@republicservices.com) (BPower@republicservices.com)
Cc: Ed Galbraith (EGalbraith@barr.com) (EGalbraith@barr.com); John Lodderhose
Subject: Uranium monitoring & analytical requirements in Bridgeton Landfill's industrial wastewater discharge permit
Attachments: Uranium - NRC sewer discharge limits vs EPA drinking water limits.pdf

Mr. Power:

It appears that there is some confusion regarding uranium as listed in Bridgeton Landfill's September 1, 2014 industrial wastewater discharge permit.

In the current permit, uranium now is listed with a radionuclide decay limit, whereas it had been listed as a metal with a concentration in the previous permits. This is because the Nuclear Regulatory Commission has a sewer discharge limit for uranium, which is reflected in the current permit. Previously, uranium had been compared to the Environmental Protection Agency's drinking water maximum contaminant levels for screening purposes.

Parameter	Limit *	Limit Type **	Sampling Frequency
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo

Further toward the issue is that while the term "uranium (total)" is used in all permits, the actual terminology used by the NRC is "Uranium-natural". Natural uranium is defined by the NRC as uranium-234, uranium-235, and uranium-238. Thus, results of analyses for these three radionuclides can be totalized for a uranium-natural value.

For future reports, please include the radionuclide concentration for uranium as part of your analyses and reports. However, we do wish for you to continue to monitor for and report uranium (total) as a metal in ug/L, since the drinking water maximum contaminant levels still exist as an issue to watch. We can include this in the permit revision that will be necessary to reflect recent report submittal address changes for the volume reports, as well as your possible requested arsenic variance. The attached document provides more detailed information regarding the NRC sewer discharge limits and EPA drinking water contaminant levels.

Thank you for helping us comply with federal and state regulations. If you have any questions, please contact me at 314.436.8717.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT
Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

February 6, 2015

Brian Power
Environmental Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Variance for arsenic discharge limitation

Dear Mr. Power:

The Metropolitan St. Louis Sewer District (MSD) has reviewed your January 30, 2015 letter requesting a variance from MSD limitations for total arsenic. We have reviewed your submittal, our data regarding current and allowable loadings for arsenic at MSD's affected treatment plants (Missouri River, Coldwater Creek, and Bissell Point), and potential impacts on the environment. Our review of your submitted data drew slightly different conclusions regarding the necessary variance level. Therefore, MSD grants a variance as follows:

- The total arsenic limit shall not exceed 0.77 mg/L on a daily average basis, nor shall it exceed the normal MSD Ordinance No. 12559 instantaneous limit of 1.2 mg/L.

We will be formally incorporating the total arsenic variance into Bridgeton Landfill's Industrial Wastewater Discharge Permit. However, Bridgeton Landfill may begin operating under the total arsenic variance level prior to receipt of the revised permit.

Please note that Ordinance No. 12559, Article VI, Section Two.B states, "No variance may be approved for a time period longer than five (5) years." The total arsenic variance shall expire with Bridgeton Landfill's permit expiration, unless MSD finds need to revoke or modify the variance per Ordinance No. 12559, Article VI, Section Two.D. You will need to reapply for the total arsenic variance when you apply to renew the discharge permit.

Thank you for helping us comply with federal and state regulations. If you have any questions, please contact me at 314.436.8717.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

September 8, 2014

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - 1
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Power:

The Metropolitan St. Louis Sewer District has developed an Industrial Wastewater Discharge Permit for the above premise. Federal regulation 40 CFR 403 requires MSD to issue a permit to you. We based the permit on the following: information that you supplied in your Industrial User Questionnaire, on results from previous wastewater samplings and inspections, and on requirements contained in existing MSD ordinances and state and federal regulations.

This permit incorporates numerous changes from your previous, interim permit. Changes include new sampling point locations, special conditions to address the high strength and volume of Bridgeton Landfill's wastewater prior to pretreatment, and the termination of all variances from discharge limitations for on site discharges. In addition, this final version incorporates minor changes from the draft permit as discussed in previous, separate correspondence.

The previous interim permit, effective May 01, 2014, is voided as of the effective date of the enclosed permit.

You must submit monitoring reports on a quarterly basis, as required by the conditions of this permit. The first report due date, for this reissued permit, is October 28, 2014 and is for the third calendar quarter monitoring period. Please be sure that all parameters listed under sampling point 014 have been sampled and analyzed by September 30, 2014. For sampling point 013, if only the cooling tower blowdown is discharged until September 30, 2014, you will not be required to self-monitor for the third quarter. However, if other material, including contaminated storm water, is discharged on or before September 30, 2014, then all listed parameters must be sampled and analyzed.

The necessary report form is appended to the permit. It includes the specific certifications required by your permit. Please use this form for your report submittals. Instructions for completing the report form also are enclosed with this letter.

If you disagree with any of the terms or conditions of this permit please inform us, in writing, within 15 working days of receipt. MSD will deem absence of a response within this period as acceptance of the permit.

Please be aware that an annual permit fee will be added to your monthly sewer bill, or you will receive a separate bill, to cover administrative costs associated with the permit, as provided for under MSD ordinance 12413. The fee is normally added to the last bill of each calendar year, or shortly thereafter.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures: Industrial Wastewater Discharge Permit,
Self-monitoring Report Form, Self-monitoring Report Instructions

cc: John Lodderhose

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
HAULED & INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1003803000 - 1

EFFECTIVE DATE: September 01, 2014
EXPIRATION DATE: August 31, 2019

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 013, 014

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinances No. 12559 and No. 13701, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system, and at the Metropolitan St. Louis Sewer District's hauled waste receiving station. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

John R. Lodderhose, P.E.
Assistant Director of Engineering

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 013

SAMPLING POINT LOCATION: Manhole immediately upstream of junction manhole to pump stations for Missouri River plant, or for sewer extension line to other MSD treatment plants

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks) + Storm Water(Contaminated from leachate spills) + Cooling Tower Blowdown

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/3 mo
Benzene [mg/L]	.14	Instant	Once/3 mo
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/3 mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma	*****	Daily Avg	Once/3 mo
Iron (Total) [mg/L]	150	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/3 mo
Magnesium (Total)	*****	Daily Avg	Once/3 mo
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Silver (Total) [mg/L]	.5	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/mo
Total Phenols [mg/L]	21	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/3 mo
Transmittance Unfiltered	*****	Daily Avg	Once/mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/mo
pH [SU]	5.5	Instant	Once/mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring requirement only

DISCHARGE LIMITATIONS FOR HAULED WASTE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 014

SAMPLING POINT LOCATION: Truck loading stations at 316K gallon equalization tank or 1 M gallon biological treatment tanks

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	****	Daily Avg	Once/3 mo
Arsenic (Total)	****	Daily Avg	Once/3 mo
Benzene [mg/L]	.14	Instant	Once/3 mo
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Cadmium (Total)	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Chromium (Total)	****	Daily Avg	Once/3 mo
Copper (Total)	****	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	****	Daily Avg	Once/3 mo
Gross Beta	****	Daily Avg	Once/3 mo
Gross Gamma	****	Daily Avg	Once/3 mo
Iron (Total)	****	Daily Avg	Once/3 mo
Lead (Total)	****	Daily Avg	Once/3 mo
Magnesium (Total)	****	Daily Avg	Once/3 mo
Mercury (Total)	****	Daily Avg	Once/3 mo
Nickel (Total)	****	Daily Avg	Once/3 mo
Oil and Grease (Total)	****	Daily Avg	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Silver (Total)	****	Daily Avg	Once/3 mo
Temperature	****	Daily Avg	Once/mo
Total Phenols	****	Daily Avg	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/mo
Total Toxic Organics	****	Daily Avg	Once/3 mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Zinc (Total)	****	Daily Avg	Once/3 mo
pH	****	Daily Avg	Once/mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** Monitoring requirement only

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by October 28, 2014.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to

continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinances 12559 and 13701 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE & HAULED WASTE ORDINANCES:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559 and District Hauled Waste Ordinance 13701.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. PROHIBITED DISCHARGES

A.1. On Site Discharge Prohibited Prior to District Approval of Pretreatment Plant

Discharge of wastewater through the on site sewer (sampling point 013) shall be prohibited prior to the District's declaration of acceptance of the permittee's pretreatment plant operational conditions.

A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District) must be approved for discharge separately by the District prior to hauling to District treatment plants and discharging.

Subsequent to the District's declaration of the permittee's pretreatment plant operational acceptance, for all wastewater that has not received full treatment through the permittee's pretreatment plant and that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District), the permittee shall give prior notification to the District and shall follow the applicable requirements for the District's April 24, 2013 approval and subsequent modifications.

A.3. Special Biochemical Oxygen Demand Limitation

In addition to complying with all permit and applicable District ordinance prohibitions against the discharge of any pollutant released at a concentration which will cause interference with the operation of the wastewater system, the permittee shall not discharge through sampling point 013, at any time, wastewater with a daily mass of greater than 4,300 lb/day biochemical oxygen demand. This limitation in no way gives separate approval to or reservation for permittee of wastewater discharges with a biochemical oxygen demand above its long term average discharge levels.

A.4. Discharge Prohibited or Restricted to Protect District

Discharge of wastewater to particular District treatment plants shall be prohibited when the District so declares those plants as prohibited from receiving the permittee's wastewater. Alternately, discharge of wastewater to particular District treatment plants may be restricted by the District to certain volume or loading restrictions. Such declarations shall not be made by the District without cause, such as to prevent violations by the permittee of District Ordinance 12559 or other applicable ordinances.

Of particular note:

1. Discharge of wastewater to the District's Missouri River treatment plant shall be prohibited or limited when the permittee's wastewater has an ultraviolet transmittance percentage at a level that would interfere with proper ultraviolet disinfection at the treatment plant. At a minimum, from the first day of March through the last day of October in a calendar year, discharge to the treatment plant will be prohibited or limited.
2. Discharge of wastewater to any of the District's treatment plants shall be prohibited or limited when the

permittee's wastewater has a biochemical oxygen demand concentration at a level that would interfere with proper biological treatment at the treatment plants.

A.5. Hazardous Hauled Wastes

Pursuant to District Ordinance 13701, Section 2.B, under no circumstance may hauled waste which is hazardous waste, as defined in 40 CFR 261 or 10 CSR 25-4.261, be discharged to District facilities. The permittee shall certify on each quarterly self-monitoring report that the permittee has not discharged any hazardous hauled waste.

B. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

B.1. Sampling/Reporting Requirement for Ordinance Total Phenols

Analysis for Total Phenols is to be performed using EPA Method 625. The result to be reported is the arithmetic sum of the concentrations found for the following individual phenolic compounds:

4-chloro-3-methylphenol	4,6-dinitro-2-methylphenol	pentachlorophenol
2-chlorophenol	2,4-dinitrophenol	phenol
2,4-dichlorophenol	2-nitrophenol	2,4,6-trichlorophenol
2,4-dimethylphenol	4-nitrophenol	

As an option, prior to performing the Method 625 analysis, an initial screening may be performed using EPA Method 420.1. If this option is chosen, two separate samples must be collected, one preserved for the method 420.1 analysis and one unpreserved for a method 625 analysis, if necessary. If the screening produces a result which is less than the permit limitation for Total Phenols, the result should be reported as "less than (numerical result)", and the Method 625 analysis need not be performed. If Method 420.1 produces a result which is greater than the permit limitation, the unpreserved sample must be analyzed using Method 625 and the Method 625 result must be reported. Note: The screening analysis must be completed and a result obtained within sufficient time to ensure the Method 625 analysis, if required, can begin within the 7 day holding time of the unpreserved sample.

B.2. Sampling/Reporting Requirement for Total Toxic Organics

The permittee shall sample and report Total Toxic Organics using at a minimum EPA Methods 624 and 625, or equivalent. Other EPA Methods may be necessary to analyze for toxic organics which are or may be present in the discharge. As part of the Total Toxic Organics report, the permittee shall report all volatile and semi-volatile organics which EPA methods 624 and 625, or equivalent, scan for, as well as all organics which other methods used scan for, and the sum of all quantifiable values greater than 0.01 mg/l.

B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and acceptance procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of plant acceptance, the permittee's discharge will be sampled for the parameters listed under sampling point 013 as follows:

1. Once/day for the first 30 calendar days. This sample of fully treated leachate may be collected from an internal sampling point prior to entry into the approved storage tank; however at least the final three samples must be collected from an approved tank.
2. At the end of the 30 day period, if analytical results are obtained for at least the final 7 consecutive days at or below the limits contained in the permit for on site discharge, or in District Ordinance 12559 if not contained in the

permit, sampling will continue on a once/week schedule for the next three months.

3. Should analytical results from once/week sampling meet the discharge limits for three consecutive months, sampling will continue at a once/month frequency for the following six months.

4. Should analytical results from once/month sampling meet the discharge limits for six consecutive months, sampling will continue at the frequencies defined in the permit.

Should a sample fail to meet the discharge limit for any parameter, the sampling frequency will revert to the next more frequent sampling interval listed above. Reversion to next more frequent sampling interval shall only apply to the parameter failing to meet its discharge limit. Reversion shall continue for the period specified for the initial sampling frequency reductions.

At least one of the initial once/day samples shall be analyzed for Gross Alpha, Gross Beta, Gross Gamma, Radium-226, Radium-228, and Uranium.

The sampling intervals listed above shall apply to the permittee's discharge regardless of discharge location to the District, whether on site or hauled.

Sample type and reporting frequency shall be as follows:

Sampling Frequency	Sample Type	Reporting Frequency
Once/day (12:00 am to 12:00 am)	Grab or 24-hr composite	Once/week. Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for activity through the previous Saturday.
Once/week (Sunday to Saturday)	24-hr composite	Once/week. Reports shall be submitted within 2 weeks (14 calendar days) of sampling.
Once/calendar month	24-hr composite	Once/month. Reports shall be submitted within 3 weeks (21 calendar days) of sampling.

All grab samples shall be collected in such a manner as to be as representative as possible of the full daily discharge.

This special condition does not relieve the permittee from any violations of the industrial wastewater discharge permit, nor District Ordinance 12559, nor any other applicable District ordinances. Neither does this special condition relieve the permittee from any other obligations of the industrial wastewater discharge permit, District Ordinance 12559, or any other applicable District ordinances.

B.4. Discharge of Contaminated Storm Water

Permittee is authorized to discharge contaminated storm water to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

B.5. Operation of Westlake Pump Station Air Handling Equipment

Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

B.6. Additional Hauled Waste Requirements

The District retains the authority to add other analytical and discharge control requirements for hauled waste loads, as deemed necessary, without making a formal modification to the discharge permit.

C. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

C.1. Notification of Change Between On Site and Hauled Discharge

Whenever the permittee becomes aware of its need or desire to change discharge method between sampling point 013 (on site) or sampling point 014 (hauled), or to change distribution between the two methods if both methods are being utilized simultaneously, permittee must immediately notify the District of such need or desire.

C.2. NPDES Discharge Points

This permit does not regulate discharges at MSD sampling points 004 (NPDES 003), 009 (NPDES 004), 010 (NPDES 005), 011 (NPDES 006), or 012 (NPDES 007). These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Division of Environmental Compliance at least ten (10) days prior to the date of the planned change.

C.3. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined
(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.
The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

C.4. Repeated Submittal of Already-Submitted Analytical Results

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee need not repeat those results on the quarterly self-monitoring report.

D. SPECIAL BILLING REPORTING REQUIREMENTS

D.1. Hauled Waste Discharge Fees

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

For wastewater that has received partial treatment pursuant to Alternative 3 of the Revised Leachate SOP approved August 22, 2014, and any subsequent modifications, MSD will calculate volume and surcharge rates under Ordinance 13758, Appendix 1 using monthly average levels for BOD and TSS. The permittee will be billed this rate except that in no case will the permittee be charged more than provided for in Ordinance 13701 or its successors, presently $0.08/gallon, or less than $0.02/gallon.

In addition, the permittee also will be billed all additional fees and charges incurred by the District (including, wages. salaries, benefits, and operational costs) in receiving wastewater from the permittee discharged through sampling 014 (or otherwise hauled to the District) at times other than during normal business hours as defined in District Ordinance 13701.

D.2. Reporting Wastewater Discharged On Site

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point 013. These reports shall be sent to:

Attn: Accounts Receivable - Commercial
MSD Finance Department
2350 Market St.
St. Louis, MO 63103

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.3. Reporting Hauled Wastewater Discharge

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there). These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.4. BOD in Lieu of COD for Extra-Strength Surcharges

Upon submittal by the permittee, and acceptance by the District, of data indicating that although the BOD/COD (biochemical oxygen demand / chemical oxygen demand) ratio of the permittee's wastewater is less than 0.35, BOD is more representative of the user's actual wastewater strength and the COD in the wastewater discharge does not receive further treatment and reduction by the District beyond that commensurate with the associated BOD in the wastewater discharge, the District will calculate applicable extra-strength surcharges using BOD values in lieu of COD values.

E. DISCHARGE DAMAGES

E.1. Revocation of Hauled Waste Permit

This permit has been issued based upon the information and sample analysis provided by the permittee. The permit may be revoked by the District at any time if any submitted information is found to be incorrect, the discharges cause any operational or maintenance problems with the District's treatment system, or if the conditions and requirements of the permit are violated.

E.2. Responsibility of Damages from Hauled Waste

If any discharge by the permittee causes any operational or maintenance problems within the District's collection or treatment systems or results in violations of any conditions of the District's NPDES permit, the permittee will be responsible for damages, in accordance with applicable District ordinances or other applicable laws.

THIS IS THE LAST PAGE OF THIS PERMIT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: BRIDGETON LANDFILL LLC

Permit No: 1003803000 - 1 Effective Date: September 01, 2014 Expiration Date: August 31, 2019

Premise Address: 13570 St. Charles Rock Road, Bridgeton, MO 63044

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following.
Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS**.

O	NO DISCHARGE OF HAZARDOUS HAULED WASTE For permit special conditions that prohibit discharge of hazardous waste to the District, you are required to make the following certification: _____ I certify, since the last discharge monitoring report, there has been no discharge of hazardous waste to the District.

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION **All permittees must sign and complete the information below:** I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____

Permit file

on

Doug Mendoza

From: Doug Mendoza
Sent: Friday, September 05, 2014 11:20 AM
To: Power, Brian <BPower@republicservices.com> (BPower@republicservices.com) (BPower@republicservices.com)
Cc: Ed Galbraith (EGalbraith@barr.com) (EGalbraith@barr.com); John Lodderhose
Subject: Bridgeton Landfill final permit
Attachments: Bridgeton Landfill final permit.pdf

Brian,

As I informed your consultant Ed Galbraith, the final permit for Bridgeton Landfill will be mailed on Monday, September 8. However, I wanted you to have an electronic copy as soon as possible. Please find attached a pdf of the signed permit, excluding the facility map but including the associated self-monitoring report form.

Have a good weekend.

Doug Mendoza
MSD Industrial Pretreatment Manager

Doug Mendoza

Permit file

From: Doug Mendoza
Sent: Friday, September 05, 2014 11:04 AM
To: 'Ed Galbraith'
Cc: John Lodderhose
Subject: RE: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1 --- MSD response

Ed,

Okay. I will be incorporating the changes into the final permit and sending it out. It will go out on Monday, but with effective date remaining at September 1, 2014. Please note that you will again have 15 days to respond if you disagree with any terms in the permit.

Please be sure that all parameters listed under sampling point 014 have been sampled and analyzed by September 30, 2014. For sampling point 013, if only the cooling tower blowdown is discharged until September 30, 2014, you will not be required to self-monitor for the third calendar quarter 2014 (July 1 – September 30). However, if other material, including contaminated storm water, is discharged on or before September 30, 2014, then all listed parameters must be sampled and analyzed.

Sincerely,
Doug Mendoza
Industrial Pretreatment Manager

From: Ed Galbraith [mailto:EGalbraith@barr.com]
Sent: Friday, September 05, 2014 9:39 AM
To: Doug Mendoza
Cc: John Lodderhose; bpower@republicservices.com; Kamp, Kevin
Subject: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1 --- MSD response

Doug, thanks for taking time to discuss this morning. Please see my responses below in **GREEN CAPS.**

Again, thank you for your assistance. If the responses below are acceptable, we have no further comments.

Ed Galbraith

Senior Environmental Scientist
Jefferson City office: 573.638.5024
cell: 573.418.5562
egalbraith@barr.com
www.barr.com

resourceful. naturally. BARR

Permit File

Doug Mendoza

From: Ed Galbraith <EGalbraith@barr.com>
Sent: Friday, September 05, 2014 9:39 AM
To: Doug Mendoza
Cc: John Lodderhose; bpower@republicservices.com; Kamp, Kevin
Subject: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1 --- MSD response

Doug, thanks for taking time to discuss this morning. Please see my responses below in **GREEN CAPS.**

Again, thank you for your assistance. If the responses below are acceptable, we have no further comments.

Ed Galbraith

Senior Environmental Scientist
Jefferson City office: 573.638.5024
cell: 573.418.5562
egalbraith@barr.com
www.barr.com

resourceful. naturally. BARR

From: Doug Mendoza [mailto:DMENDOZA@stlmsd.com]
Sent: Thursday, September 04, 2014 1:15 PM
To: Ed Galbraith
Cc: John Lodderhose
Subject: FW: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1 --- MSD response

Ed,

I have reviewed the comments received from Brian Power of Bridgeton Landfill regarding MSD's draft permit to Bridgeton Landfill. All proposed revisions in the comments are acceptable, with the exception of the following. Please see each item below with discussion:

SAMPLING POINT REFERENCE NUMBER: 013
SAMPLING POINT LOCATION: Manhole immediately upstream of junction manhole to pump stations for Missouri River plant, or for sewer extension line to other MSD treatment plants.

Removing the specific reference to the Bissell Point plant is acceptable for the second pump station. However, replacing it with "sewer extension line" is overly vague. We propose adding a phrase so that the second pump station is defined as "sewer extension line to other MSD treatment plants." **THAT CHANGE IS ACCEPTALBE (eg)**

SECTION II SPECIAL CONDITIONS:

A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions under Ordinances 12559 and 13701 and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District) must be approved for discharge separately by the District ~~piror~~ prior to hauling to District treatment plants and discharging.

Most of the prohibitions of concern are contained in Ordinance 12559 (the "sewer use ordinance"). There also are certain conditions that are prohibited under Ordinance 13701 (the "hauled waste ordinance"), such as hazardous waste, so its reference needs to remain. **AS WE DISCUSSED, SINCE THIS APPLIES ONLY TO PROHIBITIONS APPLICABLE TO HAULED WASTE AND NOT TO PERMIT LIMITS, NO REFERENCE IS NEEDED. THEREFORE IT WOULD SIMPLER TO REVERT TO THE ORIGINAL DRAFT LANGUAGE AND REMOVE THE REFERENCES TO ORDINANCES. (eg)**

We are also correcting a typographical error, correcting the spelling of "prior". **THANK YOU (eg)**

B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and acceptance analysis procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of the permittee's pretreatment plant operational acceptance, the permittee's discharge will be sampled for the parameters listed under sampling point 013 as follows:

1. Once/day for the first 30 calendar days. **This sample of fully treated leachate may be collected from an internal sampling point prior to entry into the approved storage tank; however at least the final three samples must be collected from approved tank.**

....

Reporting Frequency
Once/week.
Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for **reports received** through the previous Saturday.

In response to the margin comment asking whether Bridgeton Landfill will "have to sample for analytes that are in the ordinance but are not included in the permit," the intent is only for analytes contained in the permit. We have added clarifying wording. **WE APPRECIATE THE CLARIFICATION (eg)**

For Bridgeton Landfill's suggested addition in **bold underline** above regarding sample collection location, please explain the reason for desiring this change. **FOLLOWING MSD ACCEPTANCE OF THE PLANT, THE PERMIT REQUIRES SAMPLING FOR AT LEAST 30 CONSECUTIVE DAYS TO CONFIRM PLANT PERFORMANCE. BECAUSE OF THE TRANSITIONAL SITUATION IN T1, WE CANNOT BEGIN THE 30 DAY SAMPLING IMMEDIATELY, IF THE SAMPLE IS TAKEN AT T1. ALLOWING US TO SAMPLE PERMEATE AT AN INTERNAL SAMPLING POINT WOULD ALLOW US TO BEGIN 30 DAY SAMPLING IMMEDIATELY. (eg)**

For Bridgeton Landfill's suggested wording change in **bold underline** above regarding reporting frequency, the resulting change does not make a clear sentence to us. The draft permit's original wording of "reports received for activity through the previous Saturday" seems that it should be clear and meet Bridgeton Landfill's needs and concerns. For example, if the laboratory has not yet submitted to Bridgeton Landfill a report for the discharge that occurred the previous Friday and Saturday, then Bridgeton Landfill is only required to submit the laboratory report for the activity

through the previous Thursday. Please let us know if the original wording is acceptable, or clarify Bridgeton Landfill's desires. **YOU ARE CORRECT. PLEASE REVERT TO THE ORIGINAL LANGUAGE IN MSD'S DRAFT. (eg)**

D.1. Hauled Waste Discharge Fees ~~After Declaration of Pretreatment Plant Operational Acceptance~~

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

For wastewater that has received partial treatment pursuant to Alternative 3 of the Revised Leachate SOP approved August 22, 2014, and any subsequent modifications, MSD will calculate volume and surcharge rates under Ordinance 13758, Appendix 1 using monthly average levels for BOD and TSS. The permittee will be billed this rate except that in no case will the permittee be charged more than $0.08/gallon (or the maximum allowed under future ordinances that revise or replace Ordinance 13701) or less than $0.02/gallon.

Bridgeton Landfill proposed addition of the last paragraph above. However, with this proposed paragraph, the proposed additional phrase "After Declaration of Pretreatment Plant Operational Acceptance" will limit a reduced hauled waste rate to being applied only following that acceptance. Bridgeton Landfill's average hauled waste strength already is low enough that the proposed calculated charge would be less than $0.08/gallon. Should you agree to remove the header's ending phrase, then we can begin applying a reduced hauled waste rate with next bill. **WE AGREE TO THE CHANGE (eg).**

Regarding the proposed last paragraph, it is unlikely that partially-treated, very high strength wastewater will again be hauled to MSD following complete start up of the pretreatment plant. However, should it occur, and should the current hauled waste ordinance have then been revised or replaced with a new ordinance reflecting higher treatment costs for MSD, MSD must be allowed to charge the amount authorized by the new ordinance. Please note that the wording of the paragraph still specifies that the charge would not be more than the equivalent on site discharge fee. Please let us know your agreement, or explain why you object. **AS WE DISCUSSED, AND PER A SUBSEQUENT EMAIL FROM YOU, THE FOLLOWING LANGUAGE WOULD BE MORE CONSISTENT WITH THE AGREEMENT: "The permittee will be billed this rate except that in no case will the permittee be charged more than provided for in Ordinance 13701 or its successors, presently $0.08/gallon, or less than $0.02/gallon." (eg)**

Once we have received your response, we will continue with development toward the final permit, or its issuance.

Sincerely,
Doug Mendoza
MSD Industrial Pretreatment Manager

From: Power, Brian [mailto:BPower@republicservices.com]
Sent: Thursday, September 04, 2014 8:27 AM
To: Doug Mendoza; John Lodderhose
Subject: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1

Doug,

Attached are Bridgeton Landfill's comments on the draft permit that MSD provided on Friday, August 29, 2014. To expedite your review we have incorporated proposed changes and comments into the draft in a "track change" format for ease of review. Also attached is a figure showing outfall locations for both MSD and NPDES permits. To the extent that these changes are acceptable to MSD, we have no further comments. However, if you have additional questions, please contact Ed Galbraith at Barr Engineering at 573-638-5024 or myself.

We are very excited about this final permit, as it is an important milestone in the project. Bridgeton Landfill greatly appreciates all the efforts put forth by you and others at MSD to help us reach this point.

Thank you.

Brian J. Power
Environmental Manager
Bridgeton Landfill, LLC.
13570 Saint Charles Rock Road
Bridgeton, MO 63044

Phone: (618) 410-0157
Email: bpower@republicservices.com

Doug Mendoza

File=Permit File

From: Doug Mendoza
Sent: Friday, September 05, 2014 7:34 AM
To: Ed Galbraith (EGalbraith@barr.com) (EGalbraith@barr.com)
Cc: John Lodderhose
Subject: Potential new revision to the MSD revision to Bridgeton Landfill's revision to the draft permit

Ed,

Here is wording from the agreement:

2. Payment
a. Discharge Pursuant to Conditional Approval or Interim Permit and Prior to Completion and Approval of Pretreatment Plant. For discharge of leachate in compliance with the Conditional Approval or the Interim Permit and prior to the completion of the Pretreatment Plant by the Company, and approval of the same by MSD, the Company will be charged and invoiced as provided for in Ordinance 13701, presently, **$.08** per gallon discharged to MSD through delivery via trucks to the MSD hauled waste facility at the Bissell Point WWTP, or to other facilities and through other means as permitted by MSD in MSD's sole discretion. Company shall provide volume reports to MSD on a monthly basis documenting the volume discharged. MSD shall provide monthly billing statements to the Company.

D.1. Hauled Waste Discharge Fees ~~After Declaration of Pretreatment Plant Operational Acceptance~~
Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

For wastewater that has received partial treatment pursuant to Alternative 3 of the Revised Leachate SOP approved August 22, 2014, and any subsequent modifications, MSD will calculate volume and surcharge rates under Ordinance 13758, Appendix 1 using monthly average levels for BOD and TSS. The permittee will be billed this rate except that in no case will the permittee be charged more than provided for in Ordinance 13701 or its successors, presently $0.08/gallon, or less than $0.02/gallon.

I think the newly revised wording above may work better than my first suggested revision to Bridgeton Landfill's revision.

Doug

Doug Mendoza

Permit File

From: Doug Mendoza
Sent: Thursday, September 04, 2014 1:15 PM
To: Ed Galbraith (EGalbraith@barr.com) (EGalbraith@barr.com)
Cc: John Lodderhose
Subject: FW: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1 --- MSD response
Attachments: BLF draft permit 1003803000-1 BLF Comments.docx; BLF Outfall Map 2014_0902.pdf

Ed,

I have reviewed the comments received from Brian Power of Bridgeton Landfill regarding MSD's draft permit to Bridgeton Landfill. All proposed revisions in the comments are acceptable, with the exception of the following. Please see each item below with discussion:

SAMPLING POINT REFERENCE NUMBER: ,013
SAMPLING POINT LOCATION: Manhole immediately upstream of junction manhole to pump stations for Missouri River plant~~,~~ or for sewer extension line to other MSD treatment plants.

Removing the specific reference to the Bissell Point plant is acceptable for the second pump station. However, replacing it with "sewer extension line" is overly vague. We propose adding a phrase so that the second pump station is defined as "sewer extension line to other MSD treatment plants."

SECTION II SPECIAL CONDITIONS:

A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions under Ordinances 12559 and 13701 and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District) must be approved for discharge separately by the District ~~piror~~ prior to hauling to District treatment plants and discharging.

Most of the prohibitions of concern are contained in Ordinance 12559 (the "sewer use ordinance"). There also are certain conditions that are prohibited under Ordinance 13701 (the "hauled waste ordinance"), such as hazardous waste, so its reference needs to remain.

We are also correcting a typographical error, correcting the spelling of "prior".

B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and acceptance analysis procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of the permittee's pretreatment plant operational acceptance, the permittee's discharge will be sampled for the parameters listed under sampling point 013 as follows:

1. Once/day for the first 30 calendar days. **This sample of fully treated leachate may be collected from an internal sampling point prior to entry into the approved storage tank; however at least the final three samples must be collected from approved tank.**

....

Reporting Frequency
Once/week.
Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for **reports received** through the previous Saturday.

In response to the margin comment asking whether Bridgeton Landfill will "have to sample for analytes that are in the ordinance but are not included in the permit," the intent is only for analytes contained in the permit. We have added clarifying wording.

For Bridgeton Landfill's suggested addition in **bold underline** above regarding sample collection location, please explain the reason for desiring this change.

For Bridgeton Landfill's suggested wording change in **bold underline** above regarding reporting frequency, the resulting change does not make a clear sentence to us. The draft permit's original wording of "reports received for activity through the previous Saturday" seems that it should be clear and meet Bridgeton Landfill's needs and concerns. For example, if the laboratory has not yet submitted to Bridgeton Landfill a report for the discharge that occurred the previous Friday and Saturday, then Bridgeton Landfill is only required to submit the laboratory report for the activity through the previous Thursday. Please let us know if the original wording is acceptable, or clarify Bridgeton Landfill's desires.

D.1. Hauled Waste Discharge Fees ~~After Declaration of Pretreatment Plant Operational Acceptance~~

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

For wastewater that has received partial treatment pursuant to Alternative 3 of the Revised Leachate SOP approved August 22, 2014, and any subsequent modifications, MSD will calculate volume and surcharge rates under Ordinance 13758, Appendix 1 using monthly average levels for BOD and TSS. The permittee will be billed this rate except that in no case will the permittee be charged more than $0.08/gallon (or the maximum allowed under future ordinances that revise or replace Ordinance 13701) or less than $0.02/gallon.

Bridgeton Landfill proposed addition of the last paragraph above. However, with this proposed paragraph, the proposed additional phrase "After Declaration of Pretreatment Plant Operational Acceptance" will limit a reduced hauled waste rate to being applied only following that acceptance. Bridgeton Landfill's average hauled waste strength already is low enough that the proposed calculated charge would be less than $0.08/gallon. Should you agree to remove the header's ending phrase, then we can begin applying a reduced hauled waste rate with next bill.

Regarding the proposed last paragraph, it is unlikely that partially-treated, very high strength wastewater will again be hauled to MSD following complete start up of the pretreatment plant. However, should it occur, and should the current hauled waste ordinance have then been revised or replaced with a new ordinance reflecting higher treatment costs for MSD, MSD must be allowed to charge the amount authorized by the new ordinance. Please note that the wording of

the paragraph still specifies that the charge would not be more than the equivalent on site discharge fee. Please let us know your agreement, or explain why you object.

Once we have received your response, we will continue with development toward the final permit, or its issuance.

Sincerely,
Doug Mendoza
MSD Industrial Pretreatment Manager

From: Power, Brian [mailto:BPower@republicservices.com]
Sent: Thursday, September 04, 2014 8:27 AM
To: Doug Mendoza; John Lodderhose
Subject: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1

Doug,

Attached are Bridgeton Landfill's comments on the draft permit that MSD provided on Friday, August 29, 2014. To expedite your review we have incorporated proposed changes and comments into the draft in a "track change" format for ease of review. Also attached is a figure showing outfall locations for both MSD and NPDES permits. To the extent that these changes are acceptable to MSD, we have no further comments. However, if you have additional questions, please contact Ed Galbraith at Barr Engineering at 573-638-5024 or myself.

We are very excited about this final permit, as it is an important milestone in the project. Bridgeton Landfill greatly appreciates all the efforts put forth by you and others at MSD to help us reach this point.

Thank you.

Brian J. Power
Environmental Manager
Bridgeton Landfill, LLC.
13570 Saint Charles Rock Road
Bridgeton, MO 63044

Phone: (618) 410-0157
Email: bpower@republicservices.com

Doug Mendoza

Permit file

From: Power, Brian <BPower@republicservices.com>
Sent: Thursday, September 04, 2014 8:27 AM
To: Doug Mendoza; John Lodderhose
Subject: Bridgeton Landfill's Comments on Draft Permit 1003803000 - 1
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We are very excited about this final permit, as it is an important milestone in the project. Bridgeton Landfill greatly appreciates all the efforts put forth by you and others at MSD to help us reach this point.

Thank you.

Brian J. Power
Environmental Manager
Bridgeton Landfill, LLC.
13570 Saint Charles Rock Road
Bridgeton, MO 63044

Phone: (618) 410-0157
Email: bpower@republicservices.com

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
HAULED & INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1003803000 - 1

EFFECTIVE DATE: September 01, 2014
EXPIRATION DATE: August 31, 2019

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 013, 014

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinances No. 12559 and No. 13701, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system, and at the Metropolitan St. Louis Sewer District's hauled waste receiving station. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

John R. Lodderhose, P.E.
Assistant Director of Engineering

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

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DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 013

SAMPLING POINT LOCATION: Manhole immediately upstream of junction manhole to pump stations for ~~Bissell Point plant or~~ Missouri River plant, or sewer extension line.

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks) + Storm Water(Contaminated from leachate spills) + Cooling Tower Blowdown

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/3 mo
Benzene [mg/L]	.14	Instant	Once/3 mo
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/3 mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma	*****	Daily Avg	Once/3 mo
Iron (Total) [mg/L]	150	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/3 mo
Magnesium (Total)	*****	Daily Avg	Once/3 mo
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Silver (Total) [mg/L]	.5	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/mo
Total Phenols [mg/L]	21	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/3 mo
Transmittance Unfiltered	*****	Daily Avg	Once/mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/mo
pH [SU]	5.5	Instant	Once/mo

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* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.
***** Monitoring requirement only

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DISCHARGE LIMITATIONS FOR HAULED WASTE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 014

SAMPLING POINT LOCATION: Truck loading stations at 316K gallon equalization tank or 1 M gallon biological treatment tanks

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including,byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	****	Daily Avg	Once/3 mo
Arsenic (Total)	****	Daily Avg	Once/3 mo
Benzene [mg/L]	.14	Instant	Once/3 mo
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Cadmium (Total)	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Chromium (Total)	****	Daily Avg	Once/3 mo
Copper (Total)	****	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	****	Daily Avg	Once/3 mo
Gross Beta	****	Daily Avg	Once/3 mo
Gross Gamma	****	Daily Avg	Once/3 mo
Iron (Total)	****	Daily Avg	Once/3 mo
Lead (Total)	****	Daily Avg	Once/3 mo
Magnesium (Total)	****	Daily Avg	Once/3 mo
Mercury (Total)	****	Daily Avg	Once/3 mo
Nickel (Total)	****	Daily Avg	Once/3 mo
Oil and Grease (Total)	****	Daily Avg	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Silver (Total)	****	Daily Avg	Once/3 mo
Temperature	****	Daily Avg	Once/mo
Total Phenols	****	Daily Avg	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/mo
Total Toxic Organics	****	Daily Avg	Once/3 mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Zinc (Total)	****	Daily Avg	Once/3 mo
pH	****	Daily Avg	Once/mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

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** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** Monitoring requirement only

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PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

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4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.

b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.

c. Daily flows, with dates, for all measurements or estimates made within the quarter.

d. Any certification statements required pursuant to the Special Conditions in Section II.

e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by October 28, 2014.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written

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report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and

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shall abide by all of the provisions of District Ordinances 12559 and 13701 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE & HAULED WASTE ORDINANCES:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559 and District Hauled Waste Ordinance 13701.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

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SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. PROHIBITED DISCHARGES

A.1. On Site Discharge Prohibited Prior to District Approval of Pretreatment Plant

Discharge of wastewater through the on site sewer (sampling point 013) shall be prohibited prior to the District's declaration of acceptance of the permittee's pretreatment plant operational conditions.

A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions under Ordinance 13701 and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District) must be approved for discharge separately by the District piror to hauling to District treatment plants and discharging.

Subsequent to the District's declaration of the permittee's pretreatment plant operational acceptance, for all wastewater that has not received full treatment through the permittee's pretreatment plant and that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District), the permittee shall give prior notification to the District and shall follow the applicable requirements for the District's April 24, 2013 approval and subsequent modifications.

A.3. Special Biochemical Oxygen Demand Limitation

In addition to complying with all permit and applicable District ordinance prohibitions against the discharge of any pollutant released at a concentration which will cause interference with the operation of the wastewater system, the permittee shall not discharge through sampling point 013, at any time, wastewater with a daily mass of greater than 4,300 lb/day biochemical oxygen demand. This limitation in no way gives separate approval to or reservation for permittee of wastewater discharges with a biochemical oxygen demand above its long term average discharge levels.

A.4. Discharge Prohibited or Restricted to Protect District

Discharge of wastewater to particular District treatment plants shall be prohibited when the District so declares those plants as prohibited from receiving the permittee's wastewater. Alternately, discharge of wastewater to particular District treatment plants may be restricted by the District to certain volume or loading restrictions. Such declarations shall not be made by the District without cause, such as to prevent violations by the permittee of District Ordinance 12559 or other applicable ordinances.

Of particular note:

1. Discharge of wastewater to the District's Missouri River treatment plant shall be prohibited or limited when the permittee's wastewater has an ultraviolet transmittance percentage at a level that would interfere with proper ultraviolet disinfection at the treatment plant. At a minimum, from the first day of March through the last day of October in a calendar year, discharge to the treatment plant will be prohibited or limited.
2. Discharge of wastewater to any of the District's treatment plants shall be prohibited or limited when the

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permittee's wastewater has a biochemical oxygen demand concentration at a level that would interfere with proper biological treatment at the treatment plants.

A.5. Hazardous Hauled Wastes

Pursuant to District Ordinance 13701, Section 2.B, under no circumstance may hauled waste which is hazardous waste, as defined in 40 CFR 261 or 10 CSR 25-4.261, be discharged to District facilities. The permittee shall certify on each quarterly self-monitoring report that the permittee has not discharged any hazardous hauled waste.

B. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

B.1. Sampling/Reporting Requirement for Ordinance Total Phenols

Analysis for Total Phenols is to be performed using EPA Method 625. The result to be reported is the arithmetic sum of the concentrations found for the following individual phenolic compounds:

4-chloro-3-methylphenol	4,6-dinitro-2-methylphenol	pentachlorophenol
2-chlorophenol	2,4-dinitrophenol	phenol
2,4-dichlorophenol	2-nitrophenol	2,4,6-trichlorophenol
2,4-dimethylphenol	4-nitrophenol	

As an option, prior to performing the Method 625 analysis, an initial screening may be performed using EPA Method 420.1. If this option is chosen, two separate samples must be collected, one preserved for the method 420.1 analysis and one unpreserved for a method 625 analysis, if necessary. If the screening produces a result which is less than the permit limitation for Total Phenols, the result should be reported as "less than (numerical result)", and the Method 625 analysis need not be performed. If Method 420.1 produces a result which is greater than the permit limitation, the unpreserved sample must be analyzed using Method 625 and the Method 625 result must be reported. Note: The screening analysis must be completed and a result obtained within sufficient time to ensure the Method 625 analysis, if required, can begin within the 7 day holding time of the unpreserved sample.

B.2. Sampling/Reporting Requirement for Total Toxic Organics

The permittee shall sample and report Total Toxic Organics using at a minimum EPA Methods 624 and 625, or equivalent. Other EPA Methods may be necessary to analyze for toxic organics which are or may be present in the discharge. As part of the Total Toxic Organics report, the permittee shall report all volatile and semi-volatile organics which EPA methods 624 and 625, or equivalent, scan for, as well as all organics which other methods used scan for, and the sum of all quantifiable values greater than 0.01 mg/l.

B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and ~~acceptance~~ analysis procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of the permittee's pretreatment plant operational acceptance, the permittee's discharge will be sampled as follows:

1. Once/day for the first 30 calendar days. This sample of fully treated leachate may be collected from an internal sampling point prior to entry into the approved storage tank; however at least the final three samples must be collected from approved tank.
2. At the end of the 30 day period, if analytical results are obtained for at least the final 7 consecutive days at or

below the limits contained in the permit for on site discharge~~, or~~, in District Ordinance 12559 if not contained in the permit, or in an approved variance, sampling will continue on a once/week schedule for the next ~~three months~~twelve weeks.

3. Should analytical results from once/week sampling meet the ~~discharge~~ limits described above for ~~three~~ twelve consecutive ~~months~~weeks, sampling will continue at a once/month frequency for the following six months.

4. Should analytical results from once/month sampling meet the ~~discharge~~ limits for six consecutive months, sampling will continue at the frequencies defined in the permit.

Comment [EBG1]: Does BLF have to sample for analytes that are in the ordinance but are not included in the permit?

Should a sample fail to meet the discharge limit for any parameter, the sampling frequency will revert to the next more frequent sampling interval listed above. Reversion to next more frequent sampling interval shall only apply to the parameter failing to meet its discharge limit. Reversion shall continue for the period specified for the initial sampling frequency reductions.

At least one of the initial once/day samples shall be analyzed for Gross Alpha, Gross Beta, Gross Gamma, Radium-226, Radium-228, and Uranium.

The sampling intervals listed above shall apply to the permittee's discharge regardless of discharge location to the District, whether on site or hauled.

Sample type and reporting frequency shall be as follows:

Sampling Frequency	Sample Type	Reporting Frequency
Once/day (12:00 am to 12:00 am) received through	Grab or 24-hr composite	Once/week. Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for ~~activity~~ reports the previous Saturday.
Once/week (Sunday to Saturday)	24-hr composite	Once/week. Reports shall be submitted within 2 weeks (14 calendar days) of sampling.
Once/calendar month	24-hr composite	Once/month. Reports shall be submitted within 3 weeks (21 calendar days) of sampling.

All grab samples shall be collected in such a manner as to be as representative as possible of the full daily discharge.

This special condition does not relieve the permittee from any violations of the industrial wastewater discharge permit, nor District Ordinance 12559, nor any other applicable District ordinances. Neither does this special condition relieve the permittee from any other obligations of the industrial wastewater discharge permit, District Ordinance 12559, or any other applicable District ordinances.

B.4. Discharge of Contaminated Storm Water

Permittee is authorized to discharge contaminated storm water to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

B.5. Operation of Westlake Pump Station Air Handling Equipment

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Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

B.6. Additional Hauled Waste Requirements

The District retains the authority to add other analytical and discharge control requirements for hauled waste loads, as deemed necessary, without making a formal modification to the discharge permit.

C. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

C.1. Notification of Change Between On Site and Hauled Discharge

Whenever the permittee becomes aware of its need or desire to change discharge method between sampling point 013 (on site) or sampling point 014 (hauled), or to change distribution between the two methods if both methods are being utilized simultaneously, permittee must immediately notify the District of such need or desire.

C.2. NPDES Discharge Points

This permit does not regulate discharges at MSD sampling points 004 (NPDES 003), 009 (NPDES 004), 010 (NPDES 005), 011 (NPDES 006), or 012 (NPDES 007). These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Division of Environmental Compliance at least ten (10) days prior to the date of the planned change.

C.3. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined
(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.
The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

C.4. Repeated Submittal of Already-Submitted Analytical Results

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee

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need not repeat those results on the quarterly self-monitoring report.

D. SPECIAL BILLING REPORTING REQUIREMENTS

D.1. Hauled Waste Discharge Fees After Declaration of Pretreatment Plant Operational Acceptance

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

For wastewater that has received partial treatment pursuant to Alternative 3 of the Revised Leachate SOP approved August 22, 2014, and any subsequent modifications, MSD will calculate volume and surcharge rates under Ordinance 13758, Appendix 1 using monthly average levels for BOD and TSS. The permittee will be billed this rate except that in no case will the permittee be charged more than $0.08/gallon or less than $0.02/gallon.

In addition, the permittee also will be billed all additional fees and charges incurred by the District (including, wages, salaries, benefits, and operational costs) in receiving wastewater from the permittee discharged through sampling 014 (or otherwise hauled to the District) at times other than during normal business hours as defined in District Ordinance 13701.

D.2. Reporting Wastewater Discharged On Site

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point 013. These reports shall be sent to:

Attn: Accounts Receivable - Commercial
MSD Finance Department
2350 Market St.
St. Louis, MO 63103

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.3. Reporting Hauled Wastewater Discharge

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there). These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report

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stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.4. BOD in Lieu of COD for Extra-Strength Surcharges

Upon submittal by the permittee, and acceptance by the District, of data indicating that although the BOD/COD (biochemical oxygen demand / chemical oxygen demand) ratio of the permittee's wastewater is less than 0.35, BOD is more representative of the user's actual wastewater strength and the COD in the wastewater discharge does not receive further treatment and reduction by the District beyond that commensurate with the associated BOD in the wastewater discharge, the District will calculate applicable extra-strength surcharges using BOD values in lieu of COD values.

E. DISCHARGE DAMAGES

E.1. Revocation of Hauled Waste Permit

This permit has been issued based upon the information and sample analysis provided by the permittee. The permit may be revoked by the District at any time if any submitted information is found to be incorrect, the discharges cause any operational or maintenance problems with the District's treatment system, or if the conditions and requirements of the permit are violated.

E.2. Responsibility of Damages from Hauled Waste

If any discharge by the permittee causes any operational or maintenance problems within the District's collection or treatment systems or results in violations of any conditions of the District's NPDES permit, the permittee will be responsible for damages, in accordance with applicable District ordinances or other applicable laws.

THIS IS THE LAST PAGE OF THIS PERMIT

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METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: BRIDGETON LANDFILL LLC

Permit No: 1003803000 - 1 Effective Date: September 01, 2014 Expiration Date: August 31, 2019

Premise Address: 13570 St. Charles Rock Road, Bridgeton, MO 63044

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

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You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following.
Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS.**

O	NO DISCHARGE OF HAZARDOUS HAULED WASTE For permit special conditions that prohibit discharge of hazardous waste to the District, you are required to make the following certification: _____ I certify, since the last discharge monitoring report, there has been no discharge of hazardous waste to the District.

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION **All permittees must sign and complete the information below:** I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____

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METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT FACT SHEET

Check one:
FIRST TIME PERMIT ☐
RENEWAL ☒

Prepared by: Doug Mendoza	Date: 8/29/2014

PERMIT NO: 1003803000 - 1 EFFECTIVE DATE: 9/1/2014 EXPIRATION DATE: 8/31/2019

COMPANY NAME: BRIDGETON LANDFILL LLC

PREMISE ADDRESS: 13570 St. Charles Rock Road, Bridgeton, MO 63044

RELATED ACCOUNT NUMBERS: None

TYPE OF OPERATION: Inactive municipal solid waste landfill

TOTAL NUMBER OF SAMPLING POINTS: 2 or NO SAMPLING POINT ☐

NUMBER OF: ORDINANCE 2 CATEGORICAL _____ COMBINED _____

CATEGORICAL INDUSTRY? YES ☐ NO ☒

If Yes, 40 CFR _____ Subpart _____ PSES ☐ PSNS ☐

40 CFR _____ Subpart _____ PSES ☐ PSNS ☐

EXTRA STRENGTH SURCHARGE? YES ☐ NO ☒ If Yes, BOD _____ COD _____ TSS _____

RETURN FACTOR? YES ☐ NO ☒ If Yes, Acct #(s) _____ RF _____

SPECIAL CONDITIONS REQUIRED? YES ☒ NO ☐

All SMR start dates begin at start of calendar quarter: ☒ same as/containing permit effective date
☐ following permit effective date

SMR General Cert. B attached to first permit SP (013) at reporting frequency of once/3mo? Y ☒ N ☐

SUPPORTING DOCUMENTS ATTACHED	YES	NO	N/A
"Special Certs & Gen Rpts for Spec Conditions not tied to Specific SPs" Sheet:	☒	☐	
Pollutant & Limitations Documentation Sheets:	☒	☐	
Permit Preparation Checklist:	☒	☐	
Production-based Standards Calc. Sheets (for Sampling Points _____)	☐	☐	☒
Mass-based Standards Calc. Sheets (for Sampling Points _____)	☐	☐	☒
Equivalent Concentration Limits Sheets (for Sampling Points _____)	☐	☐	☒
Most Strict Limits Sheets (for Sampling Points _____)	☐	☐	☒
Combined Wastestream Formula Sheets (for Sampling Points _____)	☐	☐	☒
Text of any Customized Special Conditions: If Yes, for which SCs: multiple	☒	☐	☐

COMMENTS (Include notations of any significant changes from last permit):
Underground "fire" at landfill causes extremely high BOD and toxic organics levels, along with high TSS and metals. Overloaded receiving treatment plant, violated discharge limits, violated prohibitions for toxic atmospheres. Multiple special conditions to insure proper operation of treatment system, discharge of treated wastewater, and contingencies for problem situations.

PERMIT NO: 1003803000 - 1

SPECIAL CONDITIONS NOT TIED TO SPECIFIC SAMPLE POINTS

Special Condition:	# E.18	# E.14	# D.3	# F.4a (D.4), F.4b (D.1)	# D.12a (B.2), D.12b (B.3), D.12c (B.4), D.12d (B.5)	# B.10d (A.4)	# E.21a (C.1)	# E.21b (C.4)
List any related SMR certifications:	# _____	# _____	# _____	# _____	# _____	# _____	# _____	# _____
SMR certification frequency:	[none]	[none]	[none]	[none]	[none]	[none]	[none]	[none]
List any related General Reports:	# Rad Disch	# _____	# _____	# _____	# _____	# _____	# _____	# _____
General Report frequency:	once 3 mo	[none]	[none]	[none]	[none]	[none]	[none]	[none]

Are all the SMR certifications listed above associated with first permit sample point (013)? YES ☒ NO ☐ N/A (No Certs) ☐

Check here if there are no non-SP-specific Special Conditions: ☐

MSD 023422

PERMIT NO: 1003803000 - 1

SAMPLING POINT REFERENCE NUMBER: 013 **TYPE:** Ord ☒ Cat ☐ Comb ☐

Wastewater Components: Landfill Leachate(Includes byproducts from underground thermal event) + Plant & Equipment Washdown(Equipment and occasional pickup truck) + Process Waste(From onsite trash transfer station) + Storm Water(Contaminated from leachate spills) + Cooling Tower Blowdown

Flow Rate: 310,000 Units: GPD Basis for Flow Rate: IUQ/permit application

Pollutants	**Basis for inclusion (or exclusion of std polls)**	**Basis for limitation** (Ord 12559, CFR___, etc)	**Monitoring frequency**	**Basis for monitoring freq.** (std for vol, etc; innocuous, low flow, etc)	**Any OK?**
GENERAL:					
FLOW			Daily	Billed for measured volume	
BOD	Also v. high conc if pretreatment fails	Spec Cond w/max lb/day	once/mo	Very high concentration if PT fails	☐
COD	Also v. high conc if pretreatment fails		once/mo	Very high concentration if PT fails	☐
O&G		Ord. 12559	once 3 mo	Std for volume	
pH		Ord. 12559	once/mo	Match BOD frequency	
Temp		Ord. 12559	once/mo	Match BOD frequency	
TSS			once/mo	Match BOD frequency	☐
Ord. TTO	Must include all vols & semi-vols	Ord. 12559	once 3 mo	High concentrations if PT fails	
Ammonia, Mg	In wastewater, may contrib to stuvite mineral formation at Mo River Plant		once 3 mo	Std for volume & presence in discharge	☐
Fe, total phenols	In wastewater	Ord. 12559	once 3 mo	Std for volume & presence in discharge	☐
UV Transmittance	Low transmittance would cause interference & NPDES violations at Mo River Plant during disinfection season	Amt req'd to allow UV disinfection system at Mo River plant to work properly	once/mo	Very high potential to cause interference & NPDES violations at Mo River Plant during disinfection season	☐
PRIORITY/CATEGORICAL:					
As,Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn	Present in wastewater	Ord. 12559	once 3 mo	Std for volume & presence in discharge	☐
Gross alpha, beta, & gamma; Ra-226, Ra-228, Uranium	In, or potentially in, wastewater; adjacent to a different contaminated landfill	Ord. 12559 prohibitions & NRC limits	once 3 mo	Std for volume & presence in discharge	☐

Special Condition:	# F.3 (slight custom)	# B.10a[A.1] (non-std)	# B.10c[A.3] (non-std)	# _____	# _____	# _____	# _____	# _____
List related SMR certs:	# _____	# _____	# _____	# _____	# _____	# _____	# _____	# _____
SMR cert frequency:	[none]	[none]	[none]	[none]	[none]	[none]	[none]	[none]
List related General Rpts:	# Disch Vol.	# _____	# _____	# _____	# _____	# _____	# _____	# _____
General Rpt frequency:	once/mo	[none]	[none]	[none]	[none]	[none]	[none]	[none]

Is this an Ord or Comb SP w/mon for TTO and that has no TOs on site? YES ☐ NO ☒ If Yes, is SMR Gen Cert. A attached at once/3 mo freq.? YES ☐

Any significant changes? YES ☒ NO ☐ Explain: New SP for new PT system to handle underground "fire." Many more pollutants and req'ts.

MSD 023423

PERMIT NO: 1003803000 - 1

SAMPLING POINT REFERENCE NUMBER: 014 **TYPE:** Ord ☒ Cat ☐ Comb ☐

Wastewater Components: Landfill Leachate(Includes byproducts from underground thermal event) + Plant & Equipment Washdown(Equipment and occasional pickup truck) + Process Waste(From onsite trash transfer station) + Storm Water(Contaminated from leachate spills) + Cooling Tower Blowdown

Flow Rate: 310,000 (when not discharging on site) Units: GPD Basis for Flow Rate: IUQ/permit application

Pollutants	**Basis for inclusion (or exclusion of std polls)**	**Basis for limitation** (Ord 12559, CFR___, etc)	**Monitoring frequency**	**Basis for monitoring freq.** (std for vol, etc; innocuous, low flow, etc)	**Any OK?**
GENERAL:					
FLOW	Paralleling on site req'ts, except no need for UV Transmittance when hauled to Bissell Point plant		Paralleling on site req'ts	Billed for measured volume	
BOD				Paralleling on site req'ts	☐
COD					☐
O&G					
pH					
Temp					
TSS					☐
Ord. TTO	Must include all vols & semi-vols				
Ammonia, Mg					☐
Fe, total phenols					☐
As,Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn					☐
Gross alpha, beta, & gamma; Ra-226, Ra-228, Uranium		Ord. 12559 prohibitions & NRC limits			☐

Special Condition:	# F.3 (slight custom)	# B.9	# D.13	# H.1	# H.2	# B.10b[A.2] (non-std)	# _____	# _____
List related SMR certs:	# _____	# O	# _____	# _____	# _____	# _____	# _____	# _____
SMR cert frequency:	[none]	once 3 mo	[none]	[none]	[none]	[none]	[none]	[none]
List related General Rpts:	# Disch Vol.	# _____	# _____	# _____	# _____	# _____	# _____	# _____
General Rpt frequency:	once/mo	[none]	[none]	[none]	[none]	[none]	[none]	[none]

Is this an Ord or Comb SP w/mon for TTO and that has no TOs on site? YES ☐ NO ☒ If Yes, is SMR Gen Cert. A attached at once/3 mo freq.? YES ☐

Any significant changes? YES ☒ NO ☐ Explain: New SP for hauling wastewater to MSD. Will be mainly until force main to Bissell is finished.

MSD 023424

PERMIT PREPARATION CHECKLIST – PART 1
(Fact Sheet Attachment)

Company Name: BRIDGETON LANDFILL LLC Permit No.: 1003803000 - 1

Effective Date: 9/1/2014 Prepared by: Doug Mendoza Date: 8/29/2014

REVIEW THE PRETREATMENT DATABASE (PIMS), INDUSTRY FILE AND PERMIT APPLICATION. ANSWER THESE QUESTIONS & UPDATE THE DATABASE PRIOR TO DEVELOPING THE DRAFT PERMIT.

1. Are the correct SICs listed? Yes ☒ No ☐
   If no, add _____ delete: _____

2. Is user in surcharge? Yes ☐ No ☒
   Non-standard SC F.4 added for potential use of BOD in lieu of COD for future surcharges
   If yes, date last certified: _____
   If yes, Special Condition F.2 applies.

3. Does user's premise have more than one MSD account? Yes ☐ No ☒
   If yes, were all account numbers correctly listed (including occupant #s)? Yes ☐ No ☐
   If no, have account numbers been corrected in database before proceeding? Yes ☐ No ☐

4. Does user have a Return Factor (RF) other than 1.00 for any account? Yes ☐ No ☒
   If yes, list acct no., RF and date last updated:
   Acct _____ RF _____ Updated _____
   Acct _____ RF _____ Updated _____
   If yes, Special Condition F.1 applies.

5. Does user discharge water from a source not included in the MSD Billing system? Yes ☒ No ☐
   If yes, Special Condition F.3 & General Report "Discharge Volume for Billing" apply.

6. Have you established agreement among permit application, water consumption records and PIMS on component flows at each SP, total SP flows and total premise flow? Yes ☒ No ☐
   If no, explain _____

7. Has user been granted any variances from ordinance limitations? Yes ☐ No ☒
   If yes, Application Date: _____
   Approval Date: _____, or approved as part of this permit issuance? Yes ☐
   (Variances cannot last more than 5 years after approval)
   If yes, Parameter(s) _____ at SP(s) _____
   If yes, Special Condition C.4 applies.

8. Have any numerical limitations been applied to user, in addition to those already contained in the ordinance? Yes ☒ No ☐
   If yes, Parameter(s) Ra-226, Ra-228, Uranium (NRC sewer limits) at SPs 013 & 014
   Date limit(s) originally applied: 9/1/14 (actually have always applied under NRC, but added to permit), or as part of variance above? ☐
   If yes, are Special Conditions, other than the standard special conditions, required? Yes ☐ No ☒
   If yes, explain under "non-standard special conditions" question below.

9. Does user discharge any radioactive materials? Yes ☒ No ☐
   If yes, Special Condition E.18 & General Report "Radiation Discharge" apply.

10. Does user generate wastes and/or wastewater by genetic engineering research? Yes ☐ No ☒
    If yes, Special Condition B.12 applies.

11. Do all of the user's active connections, to MSD sewers, have identified SPs? Yes ☒ No ☐
    If no, explain: _____
    If no, is documentation sufficient to use Special Condition Yes ☐ No ☐
    E.5 ☐ "Sampling Not Required at Connections with NO SP and with SP on parts",
    E.6 ☐ "Sampling Not Required at Connection with NO SP on it",
    E.7 ☐ "Sampling Not Required at Connection with SP on only part of it", or
    E.8 ☐ "Sampling Not Required at Permittee with No SP"?
    If no, is compliance schedule necessary to obtain documentation? Yes ☐ No ☐
    If yes, Special Condition G.1 is necessary.

12. Does premise require use of "upstream/downstream" sampling? Yes ☐ No ☒
    If yes, Upstream SP # _____ & Downstream SP # _____
    If yes, Special Conditions D.11 and E.9 apply.

13. Are there any inactive connections to MSD sewers? Yes ☐ No ☒
    If yes, Special Condition E10 applies.

14. Have you verified, in PIMS, the SP location descriptions are complete and adequate? Yes ☒ No ☐

15. Have you verified, in PIMS, the discharge components, process descriptions and related flows at all SPs, are complete and adequate? Yes ☒ No ☐

16. Does user have any discharges subject to NPDES permitting regulations? Yes ☒ No ☐
If yes, list MSD points & corresponding NPDES points: MSD004=003, MSD009=004, MSD010=005, MSD011=006, MSD012=007
If yes, Special Condition E.14 applies.

17. Do any SPs convey stormwater in addition to regulated wastewater? Yes ☐ No ☒
If yes, list points: _____ and note on P&LD sheets.
If yes, Special Condition D.10 applies.

18. Are any SPs Dry Justified in PIMS? Yes ☐ No ☒
If yes, list points _____ and note on P&LD sheets.
If yes, no self-monitoring is required, and Special Condition E.3 applies.

19. Are there SPs where user discharges only non-process wastewater? Yes ☐ No ☒
If yes, does no self-monitoring requirement / Special Condition E.3 apply? Yes ☐ No ☐
If yes, list points _____ and note on P&LD sheets.

20. Are there SPs with infrequent discharges that require coordination with the user for MSD to collect samples? Yes ☐ No ☒
If yes, list points: _____ and note on P&LD sheets.
If yes, Special Condition D.14 applies.

21. Is documentation adequate to allow use of grab samples in lieu of composites at any SPs? Yes ☐ No ☒
If yes, list points _____ and note on P&LD sheets.
If yes, Special Condition D.1 applies.

22. Are there SPs with self-monitoring requirements, but at less than a quarterly frequency, for all parameters? Yes ☐ No ☒
If yes, list points _____ and note on P&LD sheets.
If yes, Special Condition E.4 applies.

23. Can local limits TTO be removed from monitoring at any ordinance SPs? Yes ☐ No ☒
If yes, list points _____ and explain on P&LD sheets.
If yes, does TTO also need to be removed from MSD's monitoring? Yes ☐ No ☐
If yes, discuss with inspector (name: _____) and explain why it had been monitored by MSD: _____

24. Does user have a history of compliance problems at this or a previous location? Yes ☒ No ☐
If yes, explain problems: Underground "fire" at landfill causes extremely high BOD and toxic organics levels, along with high TSS and metals. Overloaded receiving treatment plant, violated discharge limits, violated prohibitions for toxic atmospheres.
If yes, is a compliance schedule required? Yes ☐ No ☒
If yes, Special Condition G.1 applies.
Is supporting documentation attached? Yes ☐ No ☐
If yes, are any other special requirements required? Yes ☒ No ☐
Explain: Multiple special conditions to insure proper operation of treatment system, discharge of treated wastewater, and contingencies for problem situations.

25. Is user required to monitor for Total Phenols at an ordinance SP? Yes ☒ No ☐
If yes, does Special Condition D.3 for Total Phenols monitoring options apply? Yes ☒ No ☐

26. Has user chosen to employ continuous monitoring techniques for:
pH? If yes, list points _____. SC E.29 & Gen Rpt "Cont-Mon pH Excursions" apply. Yes ☐ No ☒
Temp? If yes, list points _____. SC E.30 & Gen Rpt "Cont-Mon Temp Excursions" apply. Yes ☐ No ☒
LEL? If yes, list points _____. SC E.31 & Gen Rpt "Cont-Mon LEL Excursions" apply. Yes ☐ No ☒

27. Does the company perform any processes for which summaries of activities are needed? Yes ☒ No ☐
~~If yes, Special Condition E.33 & General Report "Process Activity Summary" apply.~~
Replaced by Special Condition D.12 customized to "Sampling and Reporting Frequencies."

28. Are special billing conditions, other than the standard Special Conditions, needed? Yes ☒ No ☐
If yes, describe: Special, customized fees applied for hauled waste
If yes, Special Condition F.4 applies.
Does General Report "Discharge Volume for Billing" apply? Yes ☒ No ☐
Does General Report "Custom Non-Standard" apply? Yes ☒ No ☐

29. Are any Special Conditions, other than the standard special conditions, required? Yes ☒ No ☐
If yes, explain: Same as for Q.24
Which Special Condition applies? Same as for Q.24
Is supporting documentation attached? Yes ☒ No ☐
If no, explain: _____
Does General Report "Custom Non-Standard" apply? Yes ☒ No ☐

30. Is user a hauled waste industry, discharging its wastewater at the Hauled Waste Station? Yes ☒ No ☐
Industry discharges both on site and hauls to the Hauled Waste Station.
If yes, have permit title, cover page language, & general conditions been modified? Yes ☒ No ☐
If yes, Special Conditions B.9, D.13, H.1, and H.2 apply.

31. Is user classified as a Categorical Industrial User (CIU)? Yes ☐ No ☒
If yes, complete part 2 of checklist. If no, STOP here.

List all the Special Conditions from Part 1 that are applicable to this permit.
List those that are specific to a sampling point on that sampling point's fact sheet, too.
List those that are not specific to a sampling point on the "Special Conditions Not Tied to Specific SPs" fact sheet, too.

General Report	Special Condition #	Sampling Point #
N/A	F.4a (D.4)	N/A
2 rpts - Disch Volume for Billing, one for each SP	Two F.3s, slightly customized, one for each SP	013, 014
Radiation Discharge	E.18	N/A
N/A	E.14	N/A
N/A	D.3	N/A
N/A	F.4b (D.1)	N/A
N/A	Multiple D.12s - Non-Std Sampling & Analytical Req'ts	N/A
N/A	B.9	014
N/A	D.13	014
N/A	H.1	014
N/A	H.2	014
N/A	Multiple B.10s - Non-Std Prohibited Discharges	013 for SCs B.10a (A.1) & B.10c (A.3), and 014 for SC B.10b (A.2), N/A for SC B.10d (A.4)
N/A	Two E.21's - Non-Std Cert. and Reporting Req'ts	N/A

Non-Standard and Customized Special Conditions:

A. PROHIBITED DISCHARGES

[B.10a] - A.1. On Site Discharge Prohibited Prior to District Approval of Pretreatment Plant

Discharge of wastewater through the on site sewer (sampling point 013) shall be prohibited prior to the District's declaration of acceptance of the permittee's pretreatment plant operational conditions.

[B.10b] - A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District) must be approved for discharge separately by the District prior to hauling to District treatment plants and discharging.

Subsequent to the District's declaration of the permittee's pretreatment plant operational acceptance, for all wastewater that has not received full treatment through the permittee's pretreatment plant and that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District), the permittee shall give prior notification to the District and shall follow the applicable requirements for the District's April 24, 2013 approval and subsequent modifications.

[B.10c] - A.3. Special Biochemical Oxygen Demand Limitation

In addition to complying with all permit and applicable District ordinance prohibitions against the discharge of any pollutant released at a concentration which will cause interference with the operation of the wastewater system, the permittee shall not discharge through sampling point 013, at any time, wastewater with a daily mass of greater than 4,300 lb/day biochemical oxygen demand. This limitation in no way gives separate approval to or reservation for permittee of wastewater discharges with a biochemical oxygen demand above its long term average discharge levels.

[B.10d] - A.4. Discharge Prohibited or Restricted to Protect District

Discharge of wastewater to particular District treatment plants shall be prohibited when the District so declares those plants as prohibited from receiving the permittee's wastewater. Alternately, discharge of wastewater to particular District treatment plants may be restricted by the District to certain volume or loading restrictions. Such declarations shall not be made by the District without cause, such as to prevent violations by the permittee of District Ordinance 12559 or other applicable ordinances.

Of particular note:

1. Discharge of wastewater to the District's Missouri River treatment plant shall be prohibited or limited when the permittee's wastewater has an ultraviolet transmittance percentage at a level that would interfere with proper ultraviolet disinfection at the treatment plant. At a minimum, from the first day of March through the last day of October in a calendar year, discharge to the treatment plant will be prohibited or limited.
2. Discharge of wastewater to any of the District's treatment plants shall be prohibited or limited when the permittee's wastewater has a biochemical oxygen demand concentration at a level that would interfere with proper biological treatment at the treatment plants.

B. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

[D.12a] - B.2. Sampling/Reporting Requirement for Total Toxic Organics

The permittee shall sample and report Total Toxic Organics using at a minimum EPA Methods 624 and 625, or equivalent. Other EPA Methods may be necessary to analyze for toxic organics which are or may be present in the discharge. As part of the Total Toxic Organics report, the permittee shall report all volatile and semi-volatile organics which EPA methods 624 and 625, or equivalent, scan for, as well as all organics which other methods used scan for, and the sum of all quantifiable values greater than 0.01 mg/l.

[D.12b] - B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and acceptance procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting

requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of plant acceptance, the permittee's discharge will be sampled as follows:

1. Once/day for the first 30 calendar days.
2. At the end of the 30 day period, if analytical results are obtained for at least the final 7 consecutive days at or below the limits contained in the permit for on site discharge, or in District Ordinance 12559 if not contained in the permit, sampling will continue on a once/week schedule for the next three months.
3. Should analytical results from once/week sampling meet the discharge limits for three consecutive months, sampling will continue at a once/month frequency for the following six months.
4. Should analytical results from once/month sampling meet the discharge limits for six consecutive months, sampling will continue at the frequencies defined in the permit.

Should a sample fail to meet the discharge limit for any parameter, the sampling frequency will revert to the next more frequent sampling interval listed above. Reversion to next more frequent sampling interval shall only apply to the parameter failing to meet its discharge limit. Reversion shall continue for the period specified for the initial sampling frequency reductions.

At least one of the initial once/day samples shall be analyzed for Gross Alpha, Gross Beta, Gross Gamma, Radium-226, Radium-228, and Uranium.

The sampling intervals listed above shall apply to the permittee's discharge regardless of discharge location to the District, whether on site or hauled.

Sample type and reporting frequency shall be as follows:

Sampling Frequency	Sample Type	Reporting Frequency
Once/day (12:00 am to 12:00 am)	Grab or 24-hr composite	Once/week. Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for activity through the previous Saturday.
Once/week (Sunday to Saturday)	24-hr composite	Once/week. Reports shall be submitted within 2 weeks (14 calendar days) of sampling.
Once/calendar month	24-hr composite	Once/month. Reports shall be submitted within 3 weeks (21 calendar days) of sampling.

All grab samples shall be collected in such a manner as to be as representative as possible of the full daily discharge.

This special condition does not relieve the permittee from any violations of the industrial wastewater discharge permit, nor District Ordinance 12559, nor any other applicable District ordinances. Neither does this special condition relieve the permittee from any other obligations of the industrial wastewater discharge permit, District Ordinance 12559, or any other applicable District ordinances.

[D.12c] - B.4. Discharge of Contaminated Storm Water

Permittee is authorized to discharge contaminated storm water to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

[D.12d] - B.5. Operation of Westlake Pump Station Air Handling Equipment

Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

C. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

[E.21a] - C.1. Notification of Change Between On Site and Hauled Discharge

Whenever the permittee becomes aware of its need or desire to change discharge method between sampling point 013 (on site) or sampling point 014 (hauled), or to change distribution between the two methods if both methods are being utilized

simultaneously, permittee must immediately notify the District of such need or desire.

[E.21b] - C.4. Repeated Submittal of Already-Submitted Analytical Results

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee need not repeat those results on the quarterly self-monitoring report.

D. SPECIAL BILLING REPORTING REQUIREMENTS

[F.4b] - D.1. Hauled Waste Discharge Fee

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

In addition, the permittee also will be billed all additional fees and charges incurred by the District (including, wages. salaries, benefits, and operational costs) in receiving wastewater from the permittee discharged through sampling 014 (or otherwise hauled to the District) at times other than during normal business hours as defined in District Ordinance 13701.

[F.4a] - D.4. BOD in Lieu of COD for Extra-Strength Surcharges

Upon submittal by the permittee, and acceptance by the District, of data indicating that although the BOD/COD (biochemical oxygen demand / chemical oxygen demand) ratio of the permittee's wastewater is less than 0.35, BOD is more representative of the user's actual wastewater strength and the COD in the wastewater discharge does not receive further treatment and reduction by the District beyond that commensurate with the associated BOD in the wastewater discharge, the District will calculate applicable extra-strength surcharges using BOD values in lieu of COD values.

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

August 29, 2014

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - 1
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Power:

The Metropolitan St. Louis Sewer District has completed its review of your application for renewal of the Industrial Wastewater Discharge Permit for the above premise. The current permit expires on August 31, 2019.

Federal regulation 40 CFR 403 requires MSD to issue a permit to you. We based the draft permit on the following: information that you supplied in your Industrial User Questionnaire, on results from previous wastewater samplings and inspections, and on requirements contained in existing MSD ordinances and state and federal regulations.

This permit incorporates numerous changes from your previous, interim permit. Changes include new sampling point locations, special conditions to address the high strength and volume of Bridgeton Landfill's wastewater prior to pretreatment, and the termination of all variances from discharge limitations for on-site discharges.

Please review this draft copy carefully. If you disagree with any of the terms or conditions of the proposed permit please inform us, in writing, within 15 working days of receipt. MSD will deem absence of a response within this period as acceptance of the draft permit, and we will proceed to issue the final permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8717, if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures: Industrial Wastewater Discharge Permit, Self-monitoring Report Form

cc: John Lodderhose

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
HAULED & INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1003803000 - 1

EFFECTIVE DATE: September 01, 2014
EXPIRATION DATE: August 31, 2019

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 013, 014

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinances No. 12559 and No. 13701, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system, and at the Metropolitan St. Louis Sewer District's hauled waste receiving station. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

John R. Lodderhose, P.E.
Assistant Director of Engineering

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 013

SAMPLING POINT LOCATION: Manhole immediately upstream of junction manhole to pump stations for Bissell Point plant or Missouri River plant

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks) + Storm Water(Contaminated from leachate spills) + Cooling Tower Blowdown

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/3 mo
Benzene [mg/L]	.14	Instant	Once/3 mo
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/3 mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma	*****	Daily Avg	Once/3 mo
Iron (Total) [mg/L]	150	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/3 mo
Magnesium (Total)	*****	Daily Avg	Once/3 mo
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Silver (Total) [mg/L]	.5	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/mo
Total Phenols [mg/L]	21	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/3 mo
Transmittance Unfiltered	*****	Daily Avg	Once/mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/mo
pH [SU]	5.5	Instant	Once/mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring requirement only

DRAFT

DISCHARGE LIMITATIONS FOR HAULED WASTE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 014

SAMPLING POINT LOCATION: Truck loading stations at 316K gallon equalization tank or 1 M gallon biological treatment tanks

AVERAGE WASTEWATER FLOW (GPD): 314,769

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate(Including byproducts from underground thermal event & gas condensate) + Plant & Equipment Washdown(Transfer station & jetter trucks)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	****	Daily Avg	Once/3 mo
Arsenic (Total)	****	Daily Avg	Once/3 mo
Benzene [mg/L]	.14	Instant	Once/3 mo
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/mo
Cadmium (Total)	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand	****	Daily Avg	Once/mo
Chromium (Total)	****	Daily Avg	Once/3 mo
Copper (Total)	****	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	****	Daily Avg	Once/3 mo
Gross Beta	****	Daily Avg	Once/3 mo
Gross Gamma	****	Daily Avg	Once/3 mo
Iron (Total)	****	Daily Avg	Once/3 mo
Lead (Total)	****	Daily Avg	Once/3 mo
Magnesium (Total)	****	Daily Avg	Once/3 mo
Mercury (Total)	****	Daily Avg	Once/3 mo
Nickel (Total)	****	Daily Avg	Once/3 mo
Oil and Grease (Total)	****	Daily Avg	Once/3 mo
Radium-226 [pci/L]	600	Monthly Avg	Once/3 mo
Radium-228 [pci/L]	600	Monthly Avg	Once/3 mo
Silver (Total)	****	Daily Avg	Once/3 mo
Temperature	****	Daily Avg	Once/mo
Total Phenols	****	Daily Avg	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/mo
Total Toxic Organics	****	Daily Avg	Once/3 mo
Uranium (Total) [pci/L]	3000	Monthly Avg	Once/3 mo
Zinc (Total)	****	Daily Avg	Once/3 mo
pH	****	Daily Avg	Once/mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical and radiological standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** Monitoring requirement only

DRAFT

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by October 28, 2014.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written

report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and

shall abide by all of the provisions of District Ordinances 12559 and 13701 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE & HAULED WASTE ORDINANCES:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559 and District Hauled Waste Ordinance 13701.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. PROHIBITED DISCHARGES

A.1. On Site Discharge Prohibited Prior to District Approval of Pretreatment Plant

Discharge of wastewater through the on site sewer (sampling point 013) shall be prohibited prior to the District's declaration of acceptance of the permittee's pretreatment plant operational conditions.

A.2. Untreated or Partially-treated Hauled Discharge

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, only wastewater that has received normal pretreatment to prevent discharge prohibitions and has been discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), is approved by this permit for hauling to District treatment plants and discharge. All other wastewater from the permitted facility that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District) must be approved for discharge separately by the District piror to hauling to District treatment plants and discharging.

Subsequent to the District's declaration of the permittee's pretreatment plant operational acceptance, for all wastewater that has not received full treatment through the permittee's pretreatment plant and that the permittee wishes to discharge through sampling point 014 (or otherwise haul to the District), the permittee shall give prior notification to the District and shall follow the applicable requirements for the District's April 24, 2013 approval and subsequent modifications.

A.3. Special Biochemical Oxygen Demand Limitation

In addition to complying with all permit and applicable District ordinance prohibitions against the discharge of any pollutant released at a concentration which will cause interference with the operation of the wastewater system, the permittee shall not discharge through sampling point 013, at any time, wastewater with a daily mass of greater than 4,300 lb/day biochemical oxygen demand. This limitation in no way gives separate approval to or reservation for permittee of wastewater discharges with a biochemical oxygen demand above its long term average discharge levels.

A.4. Discharge Prohibited or Restricted to Protect District

Discharge of wastewater to particular District treatment plants shall be prohibited when the District so declares those plants as prohibited from receiving the permittee's wastewater. Alternately, discharge of wastewater to particular District treatment plants may be restricted by the District to certain volume or loading restrictions. Such declarations shall not be made by the District without cause, such as to prevent violations by the permittee of District Ordinance 12559 or other applicable ordinances.

Of particular note:

1. Discharge of wastewater to the District's Missouri River treatment plant shall be prohibited or limited when the permittee's wastewater has an ultraviolet transmittance percentage at a level that would interfere with proper ultraviolet disinfection at the treatment plant. At a minimum, from the first day of March through the last day of October in a calendar year, discharge to the treatment plant will be prohibited or limited.

2. Discharge of wastewater to any of the District's treatment plants shall be prohibited or limited when the permittee's wastewater has a biochemical oxygen demand concentration at a level that would interfere with proper biological treatment at the treatment plants.

A.5. Hazardous Hauled Wastes

Pursuant to District Ordinance 13701, Section 2.B, under no circumstance may hauled waste which is hazardous waste, as defined in 40 CFR 261 or 10 CSR 25-4.261, be discharged to District facilities. The permittee shall certify on each quarterly self-monitoring report that the permittee has not discharged any hazardous hauled waste.

B. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

B.1. Sampling/Reporting Requirement for Ordinance Total Phenols

Analysis for Total Phenols is to be performed using EPA Method 625. The result to be reported is the arithmetic sum of the concentrations found for the following individual phenolic compounds:

4-chloro-3-methylphenol	4,6-dinitro-2-methylphenol	pentachlorophenol
2-chlorophenol	2,4-dinitrophenol	phenol
2,4-dichlorophenol	2-nitrophenol	2,4,6-trichlorophenol
2,4-dimethylphenol	4-nitrophenol	

As an option, prior to performing the Method 625 analysis, an initial screening may be performed using EPA Method 420.1. If this option is chosen, two separate samples must be collected, one preserved for the method 420.1 analysis and one unpreserved for a method 625 analysis, if necessary. If the screening produces a result which is less than the permit limitation for Total Phenols, the result should be reported as "less than (numerical result)", and the Method 625 analysis need not be performed. If Method 420.1 produces a result which is greater than the permit limitation, the unpreserved sample must be analyzed using Method 625 and the Method 625 result must be reported. Note: The screening analysis must be completed and a result obtained within sufficient time to ensure the Method 625 analysis, if required, can begin within the 7 day holding time of the unpreserved sample.

B.2. Sampling/Reporting Requirement for Total Toxic Organics

The permittee shall sample and report Total Toxic Organics using at a minimum EPA Methods 624 and 625, or equivalent. Other EPA Methods may be necessary to analyze for toxic organics which are or may be present in the discharge. As part of the Total Toxic Organics report, the permittee shall report all volatile and semi-volatile organics which EPA methods 624 and 625, or equivalent, scan for, as well as all organics which other methods used scan for, and the sum of all quantifiable values greater than 0.01 mg/l.

B.3. Sampling and Reporting Frequencies

Prior to the District's declaration of the permittee's pretreatment plant operational acceptance, the sampling frequency and acceptance procedure for the treated leachate discharge will follow the sampling parameters, frequency, and reporting requirements contained in the District's April 24, 2013 approval and subsequent modifications.

Following the District's declaration of plant acceptance, the permittee's discharge will be sampled as follows:

1. Once/day for the first 30 calendar days.
2. At the end of the 30 day period, if analytical results are obtained for at least the final 7 consecutive days at or below the limits contained in the permit for on site discharge, or in District Ordinance 12559 if not contained in the permit, sampling will continue on a once/week schedule for the next three months.

3. Should analytical results from once/week sampling meet the discharge limits for three consecutive months, sampling will continue at a once/month frequency for the following six months.
4. Should analytical results from once/month sampling meet the discharge limits for six consecutive months, sampling will continue at the frequencies defined in the permit.

Should a sample fail to meet the discharge limit for any parameter, the sampling frequency will revert to the next more frequent sampling interval listed above. Reversion to next more frequent sampling interval shall only apply to the parameter failing to meet its discharge limit. Reversion shall continue for the period specified for the initial sampling frequency reductions.

At least one of the initial once/day samples shall be analyzed for Gross Alpha, Gross Beta, Gross Gamma, Radium-226, Radium-228, and Uranium.

The sampling intervals listed above shall apply to the permittee's discharge regardless of discharge location to the District, whether on site or hauled.

Sample type and reporting frequency shall be as follows:

Sampling Frequency	Sample Type	Reporting Frequency
Once/day (12:00 am to 12:00 am)	Grab or 24-hr composite	Once/week. Reports shall be submitted by noon on each Wednesday and include all operational and laboratory reports received for activity through the previous Saturday.
Once/week (Sunday to Saturday)	24-hr composite	Once/week. Reports shall be submitted within 2 weeks (14 calendar days) of sampling.
Once/calendar month	24-hr composite	Once/month. Reports shall be submitted within 3 weeks (21 calendar days) of sampling.

All grab samples shall be collected in such a manner as to be as representative as possible of the full daily discharge.

This special condition does not relieve the permittee from any violations of the industrial wastewater discharge permit, nor District Ordinance 12559, nor any other applicable District ordinances. Neither does this special condition relieve the permittee from any other obligations of the industrial wastewater discharge permit, District Ordinance 12559, or any other applicable District ordinances.

B.4. Discharge of Contaminated Storm Water

Permittee is authorized to discharge contaminated storm water to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

B.5. Operation of Westlake Pump Station Air Handling Equipment

Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

B.6. Additional Hauled Waste Requirements

The District retains the authority to add other analytical and discharge control requirements for hauled waste loads, as deemed necessary, without making a formal modification to the discharge permit.

C. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

C.1. Notification of Change Between On Site and Hauled Discharge

Whenever the permittee becomes aware of its need or desire to change discharge method between sampling point 013 (on site) or sampling point 014 (hauled), or to change distribution between the two methods if both methods are being utilized simultaneously, permittee must immediately notify the District of such need or desire.

C.2. NPDES Discharge Points

This permit does not regulate discharges at MSD sampling points 004 (NPDES 003), 009 (NPDES 004), 010 (NPDES 005), 011 (NPDES 006), or 012 (NPDES 007). These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Division of Environmental Compliance at least ten (10) days prior to the date of the planned change.

C.3. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined
(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.
The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

C.4. Repeated Submittal of Already-Submitted Analytical Results

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee need not repeat those results on the quarterly self-monitoring report.

D. SPECIAL BILLING REPORTING REQUIREMENTS

D.1. Hauled Waste Discharge Fee

Following the District's declaration of the permittee's pretreatment plant operational acceptance, for wastewater that has received approved pretreatment and is discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there), the permittee will be billed at a rate of $0.02/gallon.

In addition, the permittee also will be billed all additional fees and charges incurred by the District (including, wages. salaries, benefits, and operational costs) in receiving wastewater from the permittee discharged through sampling 014 (or otherwise hauled to the District) at times other than during normal business hours as defined in District Ordinance 13701.

D.2. Reporting Wastewater Discharged On Site

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point 013. These reports shall be sent to:

Attn: Accounts Receivable - Commercial
MSD Finance Department
2350 Market St.
St. Louis, MO 63103

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.3. Reporting Hauled Wastewater Discharge

For billing purposes, the permittee shall submit monthly reports of the volume of wastewater discharged through sampling point 014 (that is, hauled directly to District treatment plants and discharged there). These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be sent within 15 days of the end of each month. For each month in which no discharge occurs, the permittee shall submit a report stating that no discharge occurred. Permittee may also be required to submit additional information or reports, to ensure compliance with MSD ordinances or with applicable State and Federal regulations. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

D.4. BOD in Lieu of COD for Extra-Strength Surcharges

Upon submittal by the permittee, and acceptance by the District, of data indicating that although the BOD/COD (biochemical oxygen demand / chemical oxygen demand) ratio of the permittee's wastewater is less than 0.35, BOD

is more representative of the user's actual wastewater strength and the COD in the wastewater discharge does not receive further treatment and reduction by the District beyond that commensurate with the associated BOD in the wastewater discharge, the District will calculate applicable extra-strength surcharges using BOD values in lieu of COD values.

E. DISCHARGE DAMAGES

E.1. Revocation of Hauled Waste Permit

This permit has been issued based upon the information and sample analysis provided by the permittee. The permit may be revoked by the District at any time if any submitted information is found to be incorrect, the discharges cause any operational or maintenance problems with the District's treatment system, or if the conditions and requirements of the permit are violated.

E.2. Responsibility of Damages from Hauled Waste

If any discharge by the permittee causes any operational or maintenance problems within the District's collection or treatment systems or results in violations of any conditions of the District's NPDES permit, the permittee will be responsible for damages, in accordance with applicable District ordinances or other applicable laws.

THIS IS THE LAST PAGE OF THIS PERMIT

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METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: BRIDGETON LANDFILL LLC

Permit No: 1003803000 - 1 Effective Date: September 01, 2014 Expiration Date: August 31, 2019

Premise Address: 13570 St. Charles Rock Road, Bridgeton, MO 63044

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS**.

O	NO DISCHARGE OF HAZARDOUS HAULED WASTE
	For permit special conditions that prohibit discharge of hazardous waste to the District, you are required to make the following certification: _____ I certify, since the last discharge monitoring report, there has been no discharge of hazardous waste to the District.

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION
	All permittees must sign and complete the information below: I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____

DRAFT

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

May 6, 2014

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - Interim
For premise at: 13570 St. Charles Rock Road, Bridgeton, MO 63044

Dear Mr. Power:

Bridgeton Landfill LLC's wastewater discharge has changed greatly since your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit was issued on December 1, 2010. In addition, Bridgeton Landfill LLC soon will be completing both a wastewater pretreatment system and a conveyance system to allow discharge to different District facilities.

As a result of the existing changes, and in anticipation of the coming changes, we are issuing the enclosed interim permit to reflect current conditions, limitations, and requirements. The interim permit has an expiration date of December 31, 2014. However, should your pretreatment system produce acceptable wastewater prior to that date, a new permit also will be developed and issued to Bridgeton Landfill LLC.

The previous permit, effective December 1, 2010, is voided as of the effective date of the enclosed permit.

You must submit monitoring reports, as required by the conditions of this permit. The necessary report form, for your required calendar quarter reports, is appended to the permit. It includes the specific certifications required by your permit. Please use this form for your report submittals. You may use other agreed upon methods to submit other reports required by the permit.

If you disagree with any of the terms or conditions of this permit please inform us, in writing, <u>within 15 working days of receipt</u>. MSD will deem absence of a response within this period as acceptance of the permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8717, if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures: Industrial Wastewater Discharge Permit, Self-monitoring Report Form

cc: John Lodderhose

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
HAULED & ONSITE INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1003803000 – Interim

EFFECTIVE DATE: May 1, 2014
EXPIRATION DATE: December 31, 2014

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 5
SAMPLING PT. REF NUMBER(S): 007
008
007-Contaminated Storm Water
008-Contaminated Storm Water
316K Tank or Tank 2

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinances No. 12559 and No. 13701, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system, and at the Metropolitan St. Louis Sewer District's hauled waste receiving station or other designated hauled waste discharge locations. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

This permit is intended to operate as an interim permit reflective of the current aeration pretreatment system operating on site. It is the intent of the District and the permittee that this permit will terminate upon full operation of the approved, complete (physical/chemical and biological/membrane filtration) pretreatment system, after which time discharge shall be governed by the terms of an updated Industrial Wastewater Discharge Permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

John R. Lodderhose, P.E.
Assistant Director of Engineering

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 007

SAMPLING POINT LOCATION: 14" pipe into Westlake Pump Station Wetwell, on S side

MAXIMUM WASTEWATER FLOW (GPD): 20,000

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate [same waste that flows through 008] (including Plant & Equipment Washdown from on site trash transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/treated batch
Arsenic (Total) [lb/day]	.722	Daily Avg	Once/treated batch
Biochemical Oxygen Demand (5 Day) [lb/day]	7,500	Daily Avg	Once/treated batch
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/treated batch
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/treated batch
Chromium (Total) [mg/L]	5	Daily Avg	Once/treated batch
Copper (Total) [mg/L]	2.7	Daily Avg	Once/treated batch
Flow [GPD]	20,000	Daily Avg	Each discharge day
Gross Alpha [pci/L]	*****	Daily Avg	Once/3 mo
Gross Beta [pci/L]	*****	Daily Avg	Once/3 mo
Gross Gamma [pci/L]	*****	Daily Avg	Once/3 mo
Iron (Total) [lb/day]	270	Daily Avg	Once/treated batch
Lead (Total) [mg/L]	.4	Daily Avg	Once/treated batch
Mercury (Total) [lb/day]	.018	Daily Avg	Once/treated batch
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/treated batch
Oil and Grease (Total) [lb/day]	2,000	Instant	Once/treated batch
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/treated batch
Total Phenols [lb/day]	12.6	Instant	Once/treated batch
Total Suspended Solids [mg/L]	****	Daily Avg	Once/treated batch
Total Toxic Organics [mg/L] ***	5.844	Instant	Once/treated batch
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Zinc (Total) [lb/day]	5.414	Daily Avg	Once/treated batch
pH [SU]	11.5	Instant	Once/treated batch
pH [SU]	5.5	Instant	Once/treated batch

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.B.2 of the permit conditions.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 008

SAMPLING POINT LOCATION: 1/2" flexible sampling hose 5' above grade off of an 8" discharge pipe on N side of AST

MAXIMUM WASTEWATER FLOW (GPD): 20,000

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate [same waste that flows through 007] (including Plant & Equipment Washdown from on site trash transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/treated batch
Arsenic (Total) [lb/day]	.722	Daily Avg	Once/treated batch
Biochemical Oxygen Demand (5 Day) [lb/day]	7,500	Daily Avg	Once/treated batch
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/treated batch
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/treated batch
Chromium (Total) [mg/L]	5	Daily Avg	Once/treated batch
Copper (Total) [mg/L]	2.7	Daily Avg	Once/treated batch
Flow [GPD]	20,000	Daily Avg	Each discharge day
Gross Alpha [pci/L]	*****	Daily Avg	Once/3 mo
Gross Beta [pci/L]	*****	Daily Avg	Once/3 mo
Gross Gamma [pci/L]	*****	Daily Avg	Once/3 mo
Iron (Total) [lb/day]	270	Daily Avg	Once/treated batch
Lead (Total) [mg/L]	.4	Daily Avg	Once/treated batch
Mercury (Total) [lb/day]	.018	Daily Avg	Once/treated batch
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/treated batch
Oil and Grease (Total) [lb/day]	2,000	Instant	Once/treated batch
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/treated batch
Total Phenols [lb/day]	12.6	Instant	Once/treated batch
Total Suspended Solids [mg/L]	****	Daily Avg	Once/treated batch
Total Toxic Organics [mg/L] ***	5.844	Instant	Once/treated batch
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Zinc (Total) [lb/day]	5.414	Daily Avg	Once/treated batch
pH [SU]	11.5	Instant	Once/treated batch
pH [SU]	5.5	Instant	Once/treated batch

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.B.2 of the permit conditions.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 007-Contaminated Storm Water [same waste that flows through SP008-Contaminated Storm Water]

SAMPLING POINT LOCATION: 14" pipe into Westlake Pump Station Wetwell, on S side

MAXIMUM WASTEWATER FLOW (GPD): ***

WASTEWATER SOURCE AND CATEGORY: Impounded stormwater that has been contaminated by a spill of landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/100,000 gal
Arsenic (Total) [mg/L]	.4	Instant	Once/100,000 gal
Benzene [mg/L]	.14	Daily Avg	Once/100,000 gal
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/100,000 gal
Chemical Oxygen Demand [lb/day]	15,000	Daily Avg	Once/100,000 gal
Chromium (Total) [mg/L]	5	Daily Avg	Once/100,000 gal
Copper (Total) [mg/L]	2.7	Daily Avg	Once/100,000 gal
Flow [GPD]	***	Daily Avg	Each discharge day
Iron (Total) [mg/L]	150	Daily Avg	Once/100,000 gal
Lead (Total) [mg/L]	.4	Daily Avg	Once/100,000 gal
Mercury (Total) [mg/L]	.01	Daily Avg	Once/100,000 gal
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/100,000 gal
Oil and Grease (Total) [mg/L]	200	Instant	Once/100,000 gal
Total Suspended Solids [mg/L]	****	Daily Avg	Once/100,000 gal
Zinc (Total) [mg/L]	3	Daily Avg	Once/100,000 gal
Ultraviolet Transmittance [percent, %], March through October	65% minimum	Instant	Once/100,000 gal
pH [SU]	11.5	Instant	Once/100,000 gal
pH [SU]	5.5	Instant	Once/100,000 gal

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.D.5 of the permit conditions

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 008-Contaminated Storm Water [same waste that flows through SP007-Contaminated Storm Water]

SAMPLING POINT LOCATION: 1/2" flexible sampling hose 5' above grade off of an 8" discharge pipe on N side of AST

MAXIMUM WASTEWATER FLOW (GPD): ***

WASTEWATER SOURCE AND CATEGORY: Impounded stormwater that has been contaminated by a spill of landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/100,000 gal
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/100,000 gal
Benzene [mg/L]	.14	Instant	Once/100,000 gal
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/100,000 gal
Chemical Oxygen Demand [lb/day]	15,000	Daily Avg	Once/100,000 gal
Chromium (Total) [mg/L]	5	Daily Avg	Once/100,000 gal
Copper (Total) [mg/L]	2.7	Daily Avg	Once/100,000 gal
Flow [GPD]	***	Daily Avg	Each discharge day
Iron (Total) [mg/L]	150	Daily Avg	Once/100,000 gal
Lead (Total) [mg/L]	.4	Daily Avg	Once/100,000 gal
Mercury (Total) [mg/L]	.01	Daily Avg	Once/100,000 gal
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/100,000 gal
Oil and Grease (Total) [mg/L]	200	Instant	Once/100,000 gal
Total Suspended Solids [mg/L]	****	Daily Avg	Once/100,000 gal
Zinc (Total) [mg/L]	3	Daily Avg	Once/100,000 gal
Ultraviolet Transmittance [percent, %], March through October	65% minimum	Instant	Once/100,000 gal
pH [SU]	11.5	Instant	Once/100,000 gal
pH [SU]	5.5	Instant	Once/100,000 gal

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.D.5 of the permit conditions

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR HAULED WASTE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 316K Tank or Tank 2

SAMPLING POINT LOCATION: 1 million gallon treatment tank at Bridgeton Landfill

MAXIMUM WASTEWATER FLOW (GPD): 225,000

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate (including Plant & Equipment Washdown from on site trash transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit	Limit Type	Sampling Frequency
*	*	*	*

* See Section II.D.6 of the permit conditions.

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first quarterly report under this permit is due by July 28, 2014.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to

continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein, unless a shorter period is approved by the District

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 12559 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE & HAULED WASTE ORDINANCES:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559 and District Hauled Waste Ordinance 13701.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. PROHIBITED DISCHARGES

A.1. Hazardous Hauled Wastes

Pursuant to District Ordinance 13701, Section 2.B, under no circumstance may hauled waste which is hazardous waste, as defined in 40 CFR 261 or 10 CSR 25-4.261, be discharged to District facilities. The permittee shall certify on each quarterly self-monitoring report that the permittee has not discharged any hazardous hauled waste.

B. DERIVATION OF LIMITATIONS

B.1. Variance Limits

Pursuant to the provisions of District Sewer Use Ordinance 12559, Article VI, Section Two, the permittee has been granted a variance to the Ordinance limitations for Arsenic (Total), Iron (Total), Mercury (Total), Oil and Grease (Total), Total Phenols, and Zinc (Total) at sampling points 007 and 008. The permittee shall comply with the alternative limits specified. The alternative limits are effective for the life of this permit but may be revoked at any time if it is determined that discharge at the variance levels is causing or contributing to interference or pass through as defined in Article II of the Ordinance. The variance will expire upon expiration of this permit unless justification for continuance of the alternative limits is provided by the permittee at the time of application for permit renewal.

B.2. Definition of and Reporting Requirement for Ordinance Total Toxic Organics

Sampling and reporting for Total Toxic Organics is to be performed as described in permit section I.A.4, except that the sum of "applicable toxic organics" shall be exclusive of the toxic organic 'phenol.' The Ordinance limitation for Total Toxic Organics shall remain numerically unchanged, but 'phenol' shall not be included in the summation of "applicable toxic organics" for the purposes of computing the Total Toxic Organics discharge level.

C. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

C.1. Grab Sampling Authorized

For parameters with a sampling frequency of once/treated batch or once/100,000 gallons, the permittee is authorized to perform self-monitoring using grab samples in lieu of the composite samples specified in General Condition I.A.3. The permittee shall certify on each quarterly self-monitoring report in which grab sampling occurs, that the grab sample results accurately represent the permittee's average daily discharge.

C.2. Non-Standard Special Sampling and Analytical Procedures

Due to accessibility problems at sampling point 008, samples may also be collected at sampling point 007 by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

C.3. Sampling / Reporting Requirement for Ordinance Total Phenols

Analysis for Total Phenols is to be performed using EPA Method 625. The result to be reported is the arithmetic sum of the concentrations found for the following individual phenolic compounds:

4-chloro-3-methylphenol	4,6-dinitro-2-methylphenol	pentachlorophenol
2-chlorophenol	2,4-dinitrophenol	phenol
2,4-dichlorophenol	2-nitrophenol	2,4,6-trichlorophenol
2,4-dimethylphenol	4-nitrophenol	

As an option, prior to performing the Method 625 analysis, an initial screening may be performed using EPA Method 420.1. If this option is chosen, two separate samples must be collected, one preserved for the method 420.1 analysis and one unpreserved for a method 625 analysis, if necessary. If the screening produces a result which is less than the permit limitation for Total Phenols, the result should be reported as "less than (numerical result)", and the Method 625 analysis need not be performed. If Method 420.1 produces a result which is greater than the permit limitation, the unpreserved sample must be analyzed using Method 625 and the Method 625 result must be reported. Note: The screening analysis must be completed and a result obtained within sufficient time to ensure the Method 625 analysis, if required, can begin within the 7 day holding time of the unpreserved sample.

C.4. Additional Hauled Waste Requirements

The District retains the authority to add other analytical and discharge control requirements for hauled waste loads, as deemed necessary, without making a formal modification to the discharge permit.

D. SPECIAL OPERATION, CERTIFICATION, AND REPORTING REQUIREMENTS

D.1. NPDES Discharge Points

This permit does not regulate discharges at MSD sampling point identifiers 004 (NPDES 003), 009 (NPDES 004), 010 (NPDES 005), 011 (NPDES 006), and 012 (NPDES 007). These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Division of Environmental Compliance at least ten (10) days prior to the date of the planned change.

D.2. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined
(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

D.3. Operation of Westlake Pump Station Air Handling Equipment

Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

D.4. Process Activity & Reporting Summary for On Site Discharge of Landfill Leachate

Permittee is authorized to discharge landfill leachate via sampling points '007' and '008' to the District's sanitary sewer system, subject to the requirements contained in the District's April 24, 2013 approval and subsequent modifications.

The permittee shall submit weekly reports, containing the information required by the approval. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO. 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

D.5. Process Activity & Reporting Summary for On Site Discharge of Contaminated Storm Water

Permittee is authorized to discharge contaminated storm water via sampling points '007-Contaminated Storm Water' and '008-Contaminated Storm Water' to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

The permittee shall submit weekly reports, containing the information required by the approval. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

D.6. Process Activity & Reporting Summary for Hauled Waste Discharge of Landfill Leachate

Permittee is authorized to discharge landfill leachate via sampling point '316K Tank or Tank 2' to the District's hauled waste receiving station or other designated hauled waste discharge locations, subject to the requirements contained in the District's April 24, 2013 approval and subsequent modifications. In the event that no discharge to the District occurs in a given calendar quarter from sample point(s) 007/008, then the permittee must analyze a sample from sampling point '316K Tank or Tank 2' for the parameters under sample point(s) 007/008 that have a once/3 mo sampling frequency.

The permittee shall submit weekly reports, containing the information required by the approval. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

D.7. Repeated Submittal of Already-Submitted Analytical Results Not Required

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee need not repeat those results on the quarterly self-monitoring report.

E. SPECIAL BILLING REPORTING REQUIREMENTS

E.1. Reporting Non-Metered Water Consumption

For billing purposes, the permittee shall submit weekly reports of the volume and strength of: leachate discharged through sampling points '007' and '008', contaminated storm water discharged through sampling points '007-Contaminated Storm Water' and '008-Contaminated Storm Water', and leachate hauled and discharged from '316K Tank or Tank 2'. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

F. DISCHARGE DAMAGES

F.1. Revocation of Permitted Hauled Waste Discharge

This permit has been issued based upon the information and sample analysis provided by the permittee. The permit may be revoked by the District at any time if any submitted information is found to be incorrect, the discharges

cause any operational or maintenance problems with the District's treatment system, or if the conditions and requirements of the permit are violated.

F.2. Responsibility of Damages from Hauled Waste

If any discharge by the permittee causes any operational or maintenance problems within the District's collection or treatment systems or results in violations of any conditions of the District's NPDES permit, the permittee will be responsible for damages, in accordance with applicable District ordinances or other applicable laws.

THIS IS THE LAST PAGE OF THIS PERMIT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: BRIDGETON LANDFILL LLC

Permit No: **1003803000 – Interim** Effective Date: **May 1, 2014** Expiration Date: **December 31, 2014**
Premise Address: 13570 St. Charles Rock Road

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS**.

D	GRAB IN LIEU OF COMPOSITE REPRESENTS WASTEWATER DISCHARGE
	For permit special conditions that authorize grab sample collection in lieu of composite sampling for any parameters, you are required to make the following certification for each reporting period in which such authorized grab samples occur: _____ I certify the grab sample results in this report and since the last discharge monitoring report accurately represent our average daily discharge at their associated sample points.
O	NO DISCHARGE OF HAZARDOUS HAULED WASTE
	For permit special conditions that prohibit discharge of hazardous waste to the District, you are required to make the following certification: _____ I certify, since the last discharge monitoring report, there has been no discharge of hazardous waste to the District.

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION
	All permittees must sign and complete the information below: I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

April 28, 2014

Brian Power
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 1003803000 - Interim
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Power:

Bridgeton Landfill LLC's wastewater discharge has changed greatly since your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit was issued on December 10, 2010. In addition, Bridgeton Landfill LLC soon will be completing both a wastewater pretreatment system and a conveyance system to allow discharge to different District facilities.

As a result of the existing changes, and in anticipation of the coming changes, we have developed a draft interim permit to reflect current conditions, limitations, and requirements. The interim permit has an expiration date of December 31, 2014. However, should your pretreatment system produce acceptable wastewater prior to that date, a new permit also will be developed and issued to Bridgeton Landfill LLC.

Please review this draft copy carefully. If you disagree with any of the terms or conditions of the proposed permit please inform us, in writing, within 15 working days of receipt. MSD will deem absence of a response within this period as acceptance of the draft permit, and we will proceed to issue the final permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8717, if you have any questions.

Thank you for helping us comply with federal and state regulations. If you have any questions, please contact me at 314.436.8717.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures: Industrial Wastewater Discharge Permit, Self-monitoring Report Form

cc: John Lodderhose

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
HAULED & ONSITE INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1003803000 – Interim **DRAFT**

EFFECTIVE DATE: May 1, 2014
EXPIRATION DATE: December 31, 2014

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 5
SAMPLING PT. REF NUMBER(S): 007
008
007-Contaminated Storm Water
008-Contaminated Storm Water
316K Tank or Tank 2

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinances No. 12559 and No. 13701, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system, and at the Metropolitan St. Louis Sewer District's hauled waste receiving station or other designated hauled waste discharge locations. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

This permit is intended to operate as an interim permit reflective of the current aeration pretreatment system operating on site. It is the intent of the District and the permittee that this permit will terminate upon full operation of the approved, complete (physical/chemical and biological/membrane filtration) pretreatment system, after which time discharge shall be governed by the terms of an updated Industrial Wastewater Discharge Permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

John R. Lodderhose, P.E.
Assistant Director of Engineering

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 007

SAMPLING POINT LOCATION: 14" pipe into Westlake Pump Station Wetwell, on S side

MAXIMUM WASTEWATER FLOW (GPD): 20,000

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate [same waste that flows through 008] (including Plant & Equipment Washdown from on site trash transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/treated batch
Arsenic (Total) [lb/day]	.722	Daily Avg	Once/treated batch
Biochemical Oxygen Demand (5 Day) [lb/day]	7,500	Daily Avg	Once/treated batch
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/treated batch
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/treated batch
Chromium (Total) [mg/L]	5	Daily Avg	Once/treated batch
Copper (Total) [mg/L]	2.7	Daily Avg	Once/treated batch
Flow [GPD]	20,000	Daily Avg	Each discharge day
Gross Alpha [pci/L]	*****	Daily Avg	Once/3 mo
Gross Beta [pci/L]	*****	Daily Avg	Once/3 mo
Gross Gamma [pci/L]	*****	Daily Avg	Once/3 mo
Iron (Total) [lb/day]	270	Daily Avg	Once/treated batch
Lead (Total) [mg/L]	.4	Daily Avg	Once/treated batch
Mercury (Total) [lb/day]	.018	Daily Avg	Once/treated batch
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/treated batch
Oil and Grease (Total) [lb/day]	2,000	Instant	Once/treated batch
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/treated batch
Total Phenols [lb/day]	12.6	Instant	Once/treated batch
Total Suspended Solids [mg/L]	****	Daily Avg	Once/treated batch
Total Toxic Organics [mg/L] ***	5.844	Instant	Once/treated batch
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Zinc (Total) [lb/day]	5.414	Daily Avg	Once/treated batch
pH [SU]	11.5	Instant	Once/treated batch
pH [SU]	5.5	Instant	Once/treated batch

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.B.2 of the permit conditions.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 008

SAMPLING POINT LOCATION: 1/2" flexible sampling hose 5' above grade off of an 8" discharge pipe on N side of AST

MAXIMUM WASTEWATER FLOW (GPD): 20,000

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate [same waste that flows through 007] (including Plant & Equipment Washdown from on site trash transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/treated batch
Arsenic (Total) [lb/day]	.722	Daily Avg	Once/treated batch
Biochemical Oxygen Demand (5 Day) [lb/day]	7,500	Daily Avg	Once/treated batch
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/treated batch
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/treated batch
Chromium (Total) [mg/L]	5	Daily Avg	Once/treated batch
Copper (Total) [mg/L]	2.7	Daily Avg	Once/treated batch
Flow [GPD]	20,000	Daily Avg	Each discharge day
Gross Alpha [pci/L]	*****	Daily Avg	Once/3 mo
Gross Beta [pci/L]	*****	Daily Avg	Once/3 mo
Gross Gamma [pci/L]	*****	Daily Avg	Once/3 mo
Iron (Total) [lb/day]	270	Daily Avg	Once/treated batch
Lead (Total) [mg/L]	.4	Daily Avg	Once/treated batch
Mercury (Total) [lb/day]	.018	Daily Avg	Once/treated batch
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/treated batch
Oil and Grease (Total) [lb/day]	2,000	Instant	Once/treated batch
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/treated batch
Total Phenols [lb/day]	12.6	Instant	Once/treated batch
Total Suspended Solids [mg/L]	****	Daily Avg	Once/treated batch
Total Toxic Organics [mg/L] ***	5.844	Instant	Once/treated batch
Uranium (Total) [mg/L]	*****	Daily Avg	Once/3 mo
Zinc (Total) [lb/day]	5.414	Daily Avg	Once/treated batch
pH [SU]	11.5	Instant	Once/treated batch
pH [SU]	5.5	Instant	Once/treated batch

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.B.2 of the permit conditions.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 007-Contaminated Storm Water [same waste that flows through SP008-Contaminated Storm Water]

SAMPLING POINT LOCATION: 14" pipe into Westlake Pump Station Wetwell, on S side

MAXIMUM WASTEWATER FLOW (GPD): ***

WASTEWATER SOURCE AND CATEGORY: Impounded stormwater that has been contaminated by a spill of landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/100,000 gal
Arsenic (Total) [mg/L]	.4	Instant	Once/100,000 gal
Benzene [mg/L]	.14	Daily Avg	Once/100,000 gal
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/100,000 gal
Chemical Oxygen Demand [lb/day]	15,000	Daily Avg	Once/100,000 gal
Chromium (Total) [mg/L]	5	Daily Avg	Once/100,000 gal
Copper (Total) [mg/L]	2.7	Daily Avg	Once/100,000 gal
Flow [GPD]	***	Daily Avg	Each discharge day
Iron (Total) [mg/L]	150	Daily Avg	Once/100,000 gal
Lead (Total) [mg/L]	.4	Daily Avg	Once/100,000 gal
Mercury (Total) [mg/L]	.01	Daily Avg	Once/100,000 gal
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/100,000 gal
Oil and Grease (Total) [mg/L]	200	Instant	Once/100,000 gal
Total Suspended Solids [mg/L]	****	Daily Avg	Once/100,000 gal
Zinc (Total) [mg/L]	3	Daily Avg	Once/100,000 gal
Ultraviolet Transmittance [percent, %], March through October	65% minimum	Instant	Once/100,000 gal
pH [SU]	11.5	Instant	Once/100,000 gal
pH [SU]	5.5	Instant	Once/100,000 gal

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.D.5 of the permit conditions

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR ON SITE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 008-Contaminated Storm Water [same waste that flows through SP007-Contaminated Storm Water]

SAMPLING POINT LOCATION: 1/2" flexible sampling hose 5' above grade off of an 8" discharge pipe on N side of AST

MAXIMUM WASTEWATER FLOW (GPD): ***

WASTEWATER SOURCE AND CATEGORY: Impounded stormwater that has been contaminated by a spill of landfill leachate.

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N) [mg/L]	*****	Daily Avg	Once/100,000 gal
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/100,000 gal
Benzene [mg/L]	.14	Instant	Once/100,000 gal
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/100,000 gal
Chemical Oxygen Demand [lb/day]	15,000	Daily Avg	Once/100,000 gal
Chromium (Total) [mg/L]	5	Daily Avg	Once/100,000 gal
Copper (Total) [mg/L]	2.7	Daily Avg	Once/100,000 gal
Flow [GPD]	***	Daily Avg	Each discharge day
Iron (Total) [mg/L]	150	Daily Avg	Once/100,000 gal
Lead (Total) [mg/L]	.4	Daily Avg	Once/100,000 gal
Mercury (Total) [mg/L]	.01	Daily Avg	Once/100,000 gal
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/100,000 gal
Oil and Grease (Total) [mg/L]	200	Instant	Once/100,000 gal
Total Suspended Solids [mg/L]	****	Daily Avg	Once/100,000 gal
Zinc (Total) [mg/L]	3	Daily Avg	Once/100,000 gal
Ultraviolet Transmittance [percent, %], March through October	65% minimum	Instant	Once/100,000 gal
pH [SU]	11.5	Instant	Once/100,000 gal
pH [SU]	5.5	Instant	Once/100,000 gal

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** See Section II.D.5 of the permit conditions

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS FOR HAULED WASTE DISCHARGE

SAMPLING POINT REFERENCE NUMBER: 316K Tank or Tank 2

SAMPLING POINT LOCATION: 1 million gallon treatment tank at Bridgeton Landfill

MAXIMUM WASTEWATER FLOW (GPD): 225,000

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate (including Plant & Equipment Washdown from on site trash transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit	Limit Type	Sampling Frequency
*	*	*	*

* See Section II.D.6 of the permit conditions.

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.
   a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.
   b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:
   a. All facility and sample description information required on the District's reporting form.
   b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
   c. Daily flows, with dates, for all measurements or estimates made within the quarter.
   d. Any certification statements required pursuant to the Special Conditions in Section II.
   e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first quarterly report under this permit is due by July 28, 2014.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to

continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein, unless a shorter period is approved by the District

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 12559 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE & HAULED WASTE ORDINANCES:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559 and District Hauled Waste Ordinance 13701.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. PROHIBITED DISCHARGES

A.1. Hazardous Hauled Wastes

Pursuant to District Ordinance 13701, Section 2.B, under no circumstance may hauled waste which is hazardous waste, as defined in 40 CFR 261 or 10 CSR 25-4.261, be discharged to District facilities. The permittee shall certify on each quarterly self-monitoring report that the permittee has not discharged any hazardous hauled waste.

B. DERIVATION OF LIMITATIONS

B.1. Variance Limits

Pursuant to the provisions of District Sewer Use Ordinance 12559, Article VI, Section Two, the permittee has been granted a variance to the Ordinance limitations for Arsenic (Total), Iron (Total), Mercury (Total), Oil and Grease (Total), Total Phenols, and Zinc (Total) at sampling points 007 and 008. The permittee shall comply with the alternative limits specified. The alternative limits are effective for the life of this permit but may be revoked at any time if it is determined that discharge at the variance levels is causing or contributing to interference or pass through as defined in Article II of the Ordinance. The variance will expire upon expiration of this permit unless justification for continuance of the alternative limits is provided by the permittee at the time of application for permit renewal.

B.2. Definition of and Reporting Requirement for Ordinance Total Toxic Organics

Sampling and reporting for Total Toxic Organics is to be performed as described in permit section I.A.4, except that the sum of "applicable toxic organics" shall be exclusive of the toxic organic 'phenol.' The Ordinance limitation for Total Toxic Organics shall remain numerically unchanged, but 'phenol' shall not be included in the summation of "applicable toxic organics" for the purposes of computing the Total Toxic Organics discharge level.

C. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

C.1. Grab Sampling Authorized

For parameters with a sampling frequency of once/treated batch or once/100,000 gallons, the permittee is authorized to perform self-monitoring using grab samples in lieu of the composite samples specified in General Condition I.A.3. The permittee shall certify on each quarterly self-monitoring report in which grab sampling occurs, that the grab sample results accurately represent the permittee's average daily discharge.

C.2. Non-Standard Special Sampling and Analytical Procedures

Due to accessibility problems at sampling point 008, samples may also be collected at sampling point 007 by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

C.3. Sampling / Reporting Requirement for Ordinance Total Phenols

Analysis for Total Phenols is to be performed using EPA Method 625. The result to be reported is the arithmetic sum of the concentrations found for the following individual phenolic compounds:

4-chloro-3-methylphenol	4,6-dinitro-2-methylphenol	pentachlorophenol
2-chlorophenol	2,4-dinitrophenol	phenol
2,4-dichlorophenol	2-nitrophenol	2,4,6-trichlorophenol
2,4-dimethylphenol	4-nitrophenol	

As an option, prior to performing the Method 625 analysis, an initial screening may be performed using EPA Method 420.1. If this option is chosen, two separate samples must be collected, one preserved for the method 420.1 analysis and one unpreserved for a method 625 analysis, if necessary. If the screening produces a result which is less than the permit limitation for Total Phenols, the result should be reported as "less than (numerical result)", and the Method 625 analysis need not be performed. If Method 420.1 produces a result which is greater than the permit limitation, the unpreserved sample must be analyzed using Method 625 and the Method 625 result must be reported. Note: The screening analysis must be completed and a result obtained within sufficient time to ensure the Method 625 analysis, if required, can begin within the 7 day holding time of the unpreserved sample.

C.4. Additional Hauled Waste Requirements

The District retains the authority to add other analytical and discharge control requirements for hauled waste loads, as deemed necessary, without making a formal modification to the discharge permit.

D. SPECIAL OPERATION, CERTIFICATION, AND REPORTING REQUIREMENTS

D.1. NPDES Discharge Points

This permit does not regulate discharges at MSD sampling point identifiers 004 (NPDES 003), 009 (NPDES 004), 010 (NPDES 005), 011 (NPDES 006), and 012 (NPDES 007). These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Division of Environmental Compliance at least ten (10) days prior to the date of the planned change.

D.2. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined

(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

D.3. Operation of Westlake Pump Station Air Handling Equipment

Permittee shall continue to maintain and operate the air ventilation, scrubber and 4-gas meter system installed at the District's Westlake Pump Station during discharge of leachate to the pump station. The permittee may suspend operation during cessation of discharge to the pump station. Upon resumption of discharge to the pump station, operation of the air equipment must resume immediately.

D.4. Process Activity & Reporting Summary for On Site Discharge of Landfill Leachate

Permittee is authorized to discharge landfill leachate via sampling points '007' and '008' to the District's sanitary sewer system, subject to the requirements contained in the District's April 24, 2013 approval and subsequent modifications.

The permittee shall submit weekly reports, containing the information required by the approval. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

D.5. Process Activity & Reporting Summary for On Site Discharge of Contaminated Storm Water

Permittee is authorized to discharge contaminated storm water via sampling points '007-Contaminated Storm Water' and '008-Contaminated Storm Water' to the District's sanitary sewer system, subject to the requirements contained in the District-approved April 14, 2014 version of the Protocol for Discharge of Contaminated Stormwater, and subsequent modifications.

The permittee shall submit weekly reports, containing the information required by the approval. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

D.6. Process Activity & Reporting Summary for Hauled Waste Discharge of Landfill Leachate

Permittee is authorized to discharge landfill leachate via sampling point '316K Tank or Tank 2' to the District's hauled waste receiving station or other designated hauled waste discharge locations, subject to the requirements contained in the District's April 24, 2013 approval and subsequent modifications. In the event that no discharge to the District occurs in a given calendar quarter from sample point(s) 007/008, then the permittee must analyze a sample from sampling point '316K Tank or Tank 2' for the parameters under sample point(s) 007/008 that have a once/3 mo sampling frequency.

The permittee shall submit weekly reports, containing the information required by the approval. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

D.7. Repeated Submittal of Already-Submitted Analytical Results Not Required

For any sampling analytical results submitted prior to the required quarterly self-monitoring report, permittee need not repeat those results on the quarterly self-monitoring report.

E. SPECIAL BILLING REPORTING REQUIREMENTS

E.1. Reporting Non-Metered Water Consumption

For billing purposes, the permittee shall submit weekly reports of the volume and strength of: leachate discharged through sampling points '007' and '008', contaminated storm water discharged through sampling points '007-Contaminated Storm Water' and '008-Contaminated Storm Water', and leachate hauled and discharged from '316K Tank or Tank 2'. These reports shall be sent to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Ave.
St. Louis, MO 63147

Alternately, the reports may be submitted electronically via mutually-agreed method. The reports shall be submitted and received no later than Wednesday morning, and shall cover the week ending the prior Saturday. For each week in which no such discharge occurs, permittee shall include with the report a statement that no such discharge occurred.

F. DISCHARGE DAMAGES

F.1. Revocation of Permitted Hauled Waste Discharge

This permit has been issued based upon the information and sample analysis provided by the permittee. The permit may be revoked by the District at any time if any submitted information is found to be incorrect, the discharges

cause any operational or maintenance problems with the District's treatment system, or if the conditions and requirements of the permit are violated.

F.2. Responsibility of Damages from Hauled Waste

If any discharge by the permittee causes any operational or maintenance problems within the District's collection or treatment systems or results in violations of any conditions of the District's NPDES permit, the permittee will be responsible for damages, in accordance with applicable District ordinances or other applicable laws.

THIS IS THE LAST PAGE OF THIS PERMIT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: BRIDGETON LANDFILL LLC

Permit No: **1003803000 – Interim** Effective Date: **May 1, 2014** Expiration Date: **December 31, 2014**
Premise Address: 13570 St. Charles Rock Road

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS**.

D	GRAB IN LIEU OF COMPOSITE REPRESENTS WASTEWATER DISCHARGE
	For permit special conditions that authorize grab sample collection in lieu of composite sampling for any parameters, you are required to make the following certification for each reporting period in which such authorized grab samples occur: _____ I certify the grab sample results in this report and since the last discharge monitoring report accurately represent our average daily discharge at their associated sample points.
O	NO DISCHARGE OF HAZARDOUS HAULED WASTE
	For permit special conditions that prohibit discharge of hazardous waste to the District, you are required to make the following certification: _____ I certify, since the last discharge monitoring report, there has been no discharge of hazardous waste to the District.

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION
	All permittees must sign and complete the information below: I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

September 28, 2010

David Vasbinder, Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 0511559802 - 2
For premise at: 13570 St. Charles Rock Road, Bridgeton, MO 63044

Dear Mr. Vasbinder:

The Metropolitan St. Louis Sewer District has developed an Industrial Wastewater Discharge Permit for the above premise. Federal regulation 40 CFR 403 requires MSD to issue a permit to you. We based the permit on the following: information that you supplied in your Industrial User Questionnaire, on results from previous wastewater samplings and inspections, and on requirements contained in existing MSD ordinances and state and federal regulations.

Except as noted in this paragraph, the terms and conditions of this permit are substantially the same as in the previous permit. The previous permit, effective November 30, 2010, is voided as of the effective date of the enclosed permit.

You must submit monitoring reports on a quarterly basis, as required by the conditions of this permit. The first report due date, for this reissued permit, is based on a complete calendar quarter monitoring period. The permittee remains responsible for reporting for the preceding calendar quarter under the previous permit. The necessary report form is appended to the permit. It includes the specific certifications required by your permit. Please use this form for your report submittals. Instructions for completing the report form also are enclosed with this letter.

If you disagree with any of the terms or conditions of this permit please inform us, in writing, within 15 working days of receipt. MSD will deem absence of a response within this period as acceptance of the permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8721, if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Mark A. Montague

Mark A. Montague
Manager of Monitoring

Enclosures: Industrial Wastewater Discharge Permit,
Self-monitoring Report Forms, Self-monitoring Report Instructions

cc: Doug Mendoza
Tom Boehm

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 0511559802 - 2

EFFECTIVE DATE: December 01, 2010
EXPIRATION DATE: November 30, 2015

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 007, 008

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 12559, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Mark A. Montague
Mark A. Montague
Manager of Monitoring

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 007

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 216,255

WASTEWATER SOURCE AND CATEGORY: Laundry Waste(Same waste that flows through SP008) + Plant & Equipment Washdown(Transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/3 mo
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chemical Oxygen Demand	****	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137)	*****	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/year
Uranium (Total)	*****	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 008

SAMPLING POINT LOCATION: 1/2" flexible sampling hose 5' above grade off of an 8" discharge pipe on N side of AST

AVERAGE WASTEWATER FLOW (GPD): 217,696

WASTEWATER SOURCE AND CATEGORY: Plant & Equipment Washdown(Transfer Station) + Laboratory Waste

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/3 mo
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chemical Oxygen Demand	****	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137)	*****	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/year
Uranium (Total)	*****	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by January 28, 2011. For non-quarterly self-monitoring requirements, the permit year commences on April 1.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 12559 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

   Metropolitan St. Louis Sewer District
   Division of Environmental Compliance
   10 East Grand Avenue
   St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at

(314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

A.1. Non-Standard Special Sampling and Analytical Procedures

Due to accessibility problems at sampling point 008, samples may also be collected at sampling point 007 by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

B. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

B.1. NPDES Discharge Point

This permit does not regulate discharges at MSD sampling points 002, 003, and 004. These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B.2. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined
(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

C. SPECIAL BILLING REPORTING REQUIREMENTS

C.1. Reporting Non-Metered Water Consumption

For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling point(s) 007 and 008. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market St.
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

C.2. Reporting Changes Which Might Impact Surcharge

Pursuant to District Wastewater User Charge Ordinances, the permittee is currently subject to extra-strength surcharge billing for Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and/or Total Suspended Solids (TSS). The permittee's current surcharge billing values are: 79 mg/l for BOD, 760 mg/l for COD and 50mg/l for TSS. These values will continue to be used until replaced by updated certified data in accordance with the procedures in the ordinance.

THIS IS THE LAST PAGE OF THIS PERMIT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: BRIDGETON LANDFILL LLC

Permit No: 0511559802 - 2 Effective Date: 12/1/2010 Expiration Date: 11/30/2015

Premise Address: 13570 St. Charles Rock Road

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS.**

NONE

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION
	All permittees must sign and complete the information below: I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Print or type name of signing official: _____ Title: _____ Telephone: _____ Signature: _____ Date: _____

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

September 23, 2010

David Vasbinder
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 0511559802 - 2
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Vasbinder:

The Metropolitan St. Louis Sewer District has completed its review of your application for renewal of the Industrial Wastewater Discharge Permit for the above premise. The current permit expires on November 30, 2010.

Federal regulation 40 CFR 403 requires MSD to issue a permit to you. We based the draft permit on the following: information that you supplied in your Industrial User Questionnaire, on results from previous wastewater samplings and inspections, and on requirements contained in existing MSD ordinances and state and federal regulations.

Except as noted in this paragraph, the terms and conditions of this permit are substantially the same as in the previous permit. Please review this draft copy carefully. If you disagree with any of the terms or conditions of the proposed permit please inform us, in writing, within 15 working days of receipt. MSD will deem absence of a response within this period as acceptance of the draft permit, and we will proceed to issue the final permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8721, if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Mark A. Montague

Mark A. Montague
Manager of Monitoring

Enclosures: Draft Industrial Wastewater Discharge Permit

cc: Doug Mendoza
Tom Boehm

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 0511559802 - 2

EFFECTIVE DATE: December 01, 2010
EXPIRATION DATE: November 30, 2015

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 007, 008

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 12559, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Mark A. Montague
Manager of Monitoring

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

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DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 007

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 216,255

WASTEWATER SOURCE AND CATEGORY: Laundry Waste(Same waste that flows through SP008) + Plant & Equipment Washdown(Transfer station)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/3 mo
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chemical Oxygen Demand	****	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137)	*****	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/year
Uranium (Total)	*****	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

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DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 008

SAMPLING POINT LOCATION: 1/2" flexible sampling hose 5' above grade off of an 8" discharge pipe on N side of AST

AVERAGE WASTEWATER FLOW (GPD): 217,696

WASTEWATER SOURCE AND CATEGORY: Plant & Equipment Washdown(Transfer Station) + Laboratory Waste

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/3 mo
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chemical Oxygen Demand	****	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Gross Alpha	*****	Daily Avg	Once/3 mo
Gross Beta	*****	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137)	*****	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Radium-226	*****	Daily Avg	Once/3 mo
Radium-228	*****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.844	Instant	Once/year
Uranium (Total)	*****	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo

* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring Requirement Only

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PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

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4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by January 28, 2011. For non-quarterly self-monitoring requirements, the permit year commences on April 1.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

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11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to

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continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 12559 until the District issues a new permit or denies the application.

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I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

DRAFT

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

A.1. Non-Standard Special Sampling and Analytical Procedures

Due to accessibility problems at sampling point 008, samples may also be collected at sampling point 007 by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

B. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

B.1. NPDES Discharge Point

This permit does not regulate discharges at MSD sampling points 002, 003, and 004. These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B.2. Radioactive Discharge Reporting Requirements

Permittee is authorized to discharge not more than the following amount of radioactive material per year to the District's sanitary sewers:

(1) For materials subject to licensing by the Nuclear Regulatory Commission:
5 curies Hydrogen-3
1 curie Carbon-14
1 curie for all other radioactive materials combined
(2) For all other materials:
1 curie for all radioactive materials combined

Excreta from individuals undergoing medical diagnosis or treatment with radiological materials shall be exempt from this prohibition. Any radioactive material discharged to the wastewater system must be readily soluble (or readily dispersible biological material) in water. This authorized level may be modified at any time should the District determine that permittee's discharge of radioactive materials, either alone or in conjunction with other user's discharges of radioactive materials, causes interference as defined in MSD Ordinance 12559.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

DRAFT

C. SPECIAL BILLING REPORTING REQUIREMENTS

C.1. Reporting Non-Metered Water Consumption

For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling point(s) 007 and 008. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market St.
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

C.2. Reporting Changes Which Might Impact Surcharge

Pursuant to District Wastewater User Charge Ordinances, the permittee is currently subject to extra-strength surcharge billing for Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and/or Total Suspended Solids (TSS). The permittee's current surcharge billing values are: 79 mg/l for BOD, 760 mg/l for COD and 50mg/l for TSS. These values will continue to be used until replaced by updated certified data in accordance with the procedures in the ordinance.

THIS IS THE LAST PAGE OF THIS PERMIT

DRAFT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER SELF MONITORING REPORT

PART I: IDENTIFYING INFORMATION

Company Name: BRIDGETON LANDFILL LLC

Permit No: 0511559802 - 2 Effective Date: 12/1/2010 Expiration Date: 11/30/2015

Premise Address: 13570 St. Charles Rock Road

Monitoring Period: ☐(JAN-MAR) ☐(APR-JUNE) ☐(JULY-SEPT) ☐(OCT-DEC)

Samples Collected By: _____

Analyses Performed By: _____

PART II: ANALYTICAL RESULTS OF SELF MONITORING

MSD SAMPLE POINT REFERENCE NUMBERS ⇨								
DATES ON WHICH SAMPLES WERE COLLECTED ⇨								
TIMES AT WHICH SAMPLES WERE COLLECTED ⇨								
PARAMETER	LIMIT	RECORD SAMPLE TYPES (G, C, M OR E) AND RESULTS BELOW (G=grab, C=composite, M=measured flow, E=estimated flow)						UNITS
FLOW								

DRAFT

You must complete and sign the certification statements on the second page.

PART III: SPECIAL CERTIFICATION STATEMENTS

Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS**.

NONE

PART IV: GENERAL CERTIFICATION STATEMENTS

B	DISCHARGE MONITORING REPORT CERTIFICATION
	All permittees must sign and complete the information below:
	I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
	Print or type name of signing official: _____
	Title: _____ Telephone: _____
	Signature: _____ Date: _____

DRAFT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT FACT SHEET

Check one:
FIRST TIME PERMIT ☐ Prepared by: MAM Date: 9/15/2010
RENEWAL ☒ Reviewed by: [illegible] Date: 4-22-10

PERMIT NO: 0511559802-2 EFFECTIVE DATE: 12/1/2010 EXPIRATION DATE: 11/30/2015

COMPANY NAME: BRIDGETON LANDFILL LLC

PREMISE ADDRESS: 13570 ST. CHARLES ROCK ROAD

RELATED ACCOUNT NUMBERS: N/A

SIC NUMBERS: 4953

TYPE OF OPERATION: LANDFILL

TOTAL NUMBER OF SAMPLING POINTS: 2 or NO SAMPLING POINT ☐

NUMBER OF: ORDINANCE 2 CATEGORICAL _____ COMBINED _____

CATEGORICAL INDUSTRY? YES ☐ NO ☒

If Yes, 40 CFR _____ Subpart _____ PSES ☐ PSNS ☐

40 CFR _____ Subpart _____ PSES ☐ PSNS ☐

EXTRA STRENGTH SURCHARGE? YES ☐ NO ☒ If Yes, BOD _____ COD _____ TSS _____

RETURN FACTOR? YES ☐ NO ☒ If Yes, Acct #(s) _____ RF _____

SPECIAL CONDITIONS REQUIRED? YES ☒ NO ☐

All SMR start dates begin at start of calendar quarter: ☐ same as/containing permit effective date
☒ following permit effective date

SMR General Cert. B attached to first permit SP (008) at reporting frequency of once/3mo? Y ☒ N ☐

SUPPORTING DOCUMENTS ATTACHED	YES	NO	N/A
Pollutant & Limitations Documentation Sheets:	☒	☐	
Permit Preparation Checklist:	☒	☐	
"Special Certs & Gen Rpts for Spec Conditions not tied to Specific SPs" Sheet:	☒	☐	
Production-based Standards Calc. Sheets (for Sampling Points _____)	☐	☐	☒
Mass-based Standards Calc. Sheets (for Sampling Points _____)	☐	☐	☒
Most Strict Limits Sheets (for Sampling Points _____)	☐	☐	☒
Combined Wastestream Formula Sheets (for Sampling Points _____)	☐	☐	☒

Other: *General certification tied to SP008 because that is the actual self-monitoring point used by the industry. See Special Condition A.1.

COMMENTS (Include notations of any significant changes from last permit):

_____

REV 9/2010

PERMIT NO: 0511559802-2

SPECIAL CONDITIONS NOT TIED TO SPECIFIC SAMPLE POINTS

Special Condition:	# E/18	# E.14	# F.2	# _____	# _____	# _____	# _____	# _____
List any related SMR certifications:	# _____	# _____	# _____	# _____	# _____	# _____	# _____	# _____
SMR certification frequency:	[none]	[none]	[none]	[none]	[none]	[none]	[none]	[none]
List any related General Reports:	# RAD REPORT	# _____	# _____	# _____	# _____	# _____	# _____	# _____
General Report frequency:	once 3 mo	[none]	[none]	[none]	[none]	[none]	[none]	[none]

Are all the SMR certifications listed above associated with first permit sample point (008 See Page 1 comments)? YES ☒ NO ☐

Check here if there are no non-SP-specific Special Conditions: ☐

PERMIT NO: 0511559802-2

SAMPLING POINT REFERENCE NUMBER: 007 **TYPE:** Ord ☒ Cat ☐ Comb ☐

Wastewater Components: : Laundry Waste(Same waste that flows through SP008) + Plant & Equipment Washdown(Transfer station)

Flow Rate: 216,255 Units: GPD Basis for Flow Rate: IUQ

Pollutants	Basis for inclusion (or exclusion of std polls)	Basis for limitation (Ord 12559, CFR___, etc)	Monitoring frequency	Basis for monitoring freq. (std for vol, etc; innocuous, low flow, etc)	Any OK?
GENERAL:					
FLOW	STANDARD		once 3 mo	Standard	
BOD	STANDARD		once 3 mo	Standard for volume	☐
COD	STANDARD		once 3 mo	Standard for volume	☐
O&G	STANDARD	Ordinance	once 3 mo	Standard for volume	
pH	STANDARD	Ordinance	once 3 mo	Standard for volume	
Temp	STANDARD	Ordinance	once 3 mo	Standard for volume	
TSS	STANDARD		once 3 mo	Standard for volume	☐
Ord. TTO	STANDARD	Ordinance	once/year	Standard	
Ammonia	Nature of discharge	Ordinance	once 3 mo	Standard for volume	☐
			[none]		☐
PRIORITY/CATEGORICAL:					
Arsenic, Cadmium	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
Chromium, Copper	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
Lead, Mercury, Nickel	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
Gross Gamma	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Gross Alpha	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Gross Beta	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Radium 226 and 228	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Uranium	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Zinc	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
			[none]		☐

Special Condition:	# F.3	# D.12	# _____	# _____	# _____	# _____	# _____	# _____
List related SMR certs:	# _____	# _____	# _____	# _____	# _____	# _____	# _____	# _____
SMR cert frequency:	[none]	[none]	[none]	[none]	[none]	[none]	[none]	[none]
List related General Rpts:	# Dis Vol	# _____	# _____	# _____	# _____	# _____	# _____	# _____
General Rpt frequency:	once/mo	[none]	[none]	[none]	[none]	[none]	[none]	[none]

Is this an Ord or Comb SP w/mon for TTO and that has no TOs on site? YES ☐ NO ☒ If Yes, is SMR Gen Cert. A attached at once/3 mo freq.? YES ☐

Any significant changes? YES ☐ NO ☒ Explain: _____

REV 9/2010

MSD 023517

PERMIT NO: 0511559802-2

SAMPLING POINT REFERENCE NUMBER: 008 **TYPE:** Ord ☒ Cat ☐ Comb ☐

Wastewater Components: Plant & Equipment Washdown(Transfer Station) + Laboratory Waste

Flow Rate: 217,696 Units: GPD Basis for Flow Rate: IUQ

Pollutants	Basis for inclusion (or exclusion of std polls)	Basis for limitation (Ord 12559, CFR___, etc)	Monitoring frequency	Basis for monitoring freq. (std for vol, etc; innocuous, low flow, etc)	Any OK?
GENERAL:					
FLOW	STANDARD		once 3 mo	Standard	
BOD	STANDARD		once 3 mo	Standard for volume	☐
COD	STANDARD		once 3 mo	Standard for volume	☐
O&G	STANDARD	Ordinance	once 3 mo	Standard for volume	
pH	STANDARD	Ordinance	once 3 mo	Standard for volume	
Temp	STANDARD	Ordinance	once 3 mo	Standard for volume	
TSS	STANDARD		once 3 mo	Standard for volume	☐
Ord. TTO	STANDARD	Ordinance	once/year	Standard	
Ammonia	Nature of discharge	Ordinance	once 3 mo	Standard for volume	☐
			[none]		☐
PRIORITY/CATEGORICAL:					
Arsenic, Cadmium	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
Chromium, Copper	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
Lead, Mercury, Nickel	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
Gross Gamma	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Gross Alpha	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Gross Beta	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Radium 226 and 228	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Uranium	Nature of discharge	No Limit-Mon Only	once 3 mo	Standard for volume	☐
Zinc	Nature of discharge-SP OR KP IUQ	Ordinance	once 3 mo	Standard for volume	☐
			[none]		☐

Special Condition:	# F.3	# D.12	# _____	# _____	# _____	# _____	# _____	# _____
List related SMR certs:	# _____	# _____	# _____	# _____	# _____	# _____	# _____	# _____
SMR cert frequency:	[none]	[none]	[none]	[none]	[none]	[none]	[none]	[none]
List related General Rpts:	# Dis Vol	# _____	# _____	# _____	# _____	# _____	# _____	# _____
General Rpt frequency:	once/mo	[none]	[none]	[none]	[none]	[none]	[none]	[none]

Is this an Ord or Comb SP w/mon for TTO and that has no TOs on site? YES ☐ NO ☒ If Yes, is SMR Gen Cert. A attached at once/3 mo freq.? YES ☐

Any significant changes? YES ☐ NO ☒ Explain: _____

REV 9/2010

MSD 023518

PERMIT PREPARATION CHECKLIST - PART 1
(Fact Sheet Attachment)

Company Name: BRIDGETON LANDFILL LLC | Permit No.: 0511559802-2

Effective Date: 12/1/2010 | Prepared by: MAM | Date: 9/15/2010

REVIEW THE PRETREATMENT DATABASE (PIMS), INDUSTRY FILE AND PERMIT APPLICATION. ANSWER THESE QUESTIONS & UPDATE THE DATABASE PRIOR TO DEVELOPING THE DRAFT PERMIT.

1. Are the correct SICs listed? Yes ☒ No ☐
   If no, add _____ delete: _____

2. Is user in surcharge? Yes ☒ No ☐
   If yes, date last certified: 5/19/2009
   If yes, Special Condition F.2 applies.

3. Does user's premise have more than one MSD account? Yes ☐ No ☒
   If yes, were all account numbers correctly listed (including occupant #s)? Yes ☐ No ☐
   If no, have account numbers been corrected in database before proceeding? Yes ☐ No ☐

4. Does user have a Return Factor (RF) other than 1.00 for any account? Yes ☐ No ☒
   If yes, list acct no., RF and date last updated:
   Acct _____ RF _____ Updated _____
   Acct _____ RF _____ Updated _____
   If yes, Special Condition F.1 applies.

5. Does user discharge water from a source not included in the MSD Billing system? Yes ☒ No ☐
   If yes, Special Condition F.3 & General Report "Discharge Volume for Billing" apply.

6. Have you established agreement among permit application, water consumption records and PIMS on component flows at each SP, total SP flows and total premise flow? Yes ☒ No ☐
   If no, explain _____

7. Has user been granted any variances from ordinance limitations? Yes ☐ No ☒
   If yes Parameter(s) _____ at SP(s) _____
   If yes, Special Condition C.4 applies.

8. Does user discharge any radioactive materials? Yes ☒ No ☐
   If yes, Special Condition E.18 & General Report "Radiation Discharge" apply.

9. Do all of the user's active connections, to MSD sewers, have identified SPs? Yes ☒ No ☐
   If no, explain: _____
   If no, is documentation sufficient to use Spec Cond E.5☐, E.6☐, E.7☐, or E.8☐? Yes ☐ No ☐
   If no, is compliance schedule necessary to obtain documentation? Yes ☐ No ☐
   If yes, Special Condition G.1 is necessary.

10. Does premise require use of "upstream/downstream" sampling? Yes ☐ No ☒
    If yes, Upstream SP # _____ & Downstream SP # _____
    If yes, Special Conditions D.11 and E.9 apply.

11. Are there any inactive connections to MSD sewers? Yes ☐ No ☒
    If yes, does Special Condition E10. apply? Yes ☐ No ☐

12. Have you verified, in PIMS, the SP location descriptions are complete and adequate? Yes ☒ No ☐

13. Have you verified, in PIMS, the discharge components, process descriptions and related flows at all SPs, are complete and adequate? Yes ☒ No ☐

14. Are any SPs Dry Justified? Yes ☐ No ☒
    If yes, list points and note on P&LD sheets.
    If yes, Special Condition E.3 applies.

15. Do any SPs convey stormwater in addition to regulated wastewater? Yes ☐ No ☒
    If yes, list points: _____ and note on P&LD sheets.
    If yes, Special Condition D.10 applies.

16. Does user have any discharges subject to NPDES permitting regulations? Yes ☒ No ☐
    If yes, list MSD points & corresponding NPDES points: 002, 003, 004
    If yes, Special Condition E.14 applies.

17. Are there some SPs where user discharges only non-process wastewater? Yes ☐ No ☒
    If yes, does Special Condition E.3 apply? Yes ☐ No ☐
    If yes, list points _____ and note on P&LD sheets.

18. Is documentation adequate to allow use of grab samples in lieu of composites at any SPs? Yes ☐ No ☒
    If yes, list points _____ and note on P&LD sheets.
    If yes, Special Condition D.1 applies.

19. Are there SPs with less than a quarterly self-monitoring frequency for all parameters? Yes ☐ No ☒
If yes, list points _____ and note on P&LD sheets.
If yes, Special Condition E.4 applies.

20. Can local limits TTO be removed from monitoring at any ordinance SPs? Yes ☐ No ☒
If yes, list points _____ and explain on P&LD sheets.
If yes, does TTO also need to be removed from MSD's monitoring? Yes ☐ No ☐
If yes, discuss with inspector (name: _____) and explain why it had been monitored by MSD: _____

21. Does user have a history of compliance problems at this or a previous location? Yes ☐ No ☒
If yes, is a compliance schedule required? Yes ☐ No ☐
If yes, Special Condition G.1 applies.
Is supporting documentation attached? Yes ☐ No ☐

22. Is user required to monitor for Total Phenols at an ordinance SP? Yes ☐ No ☒
If yes, does Special Condition D.3 apply? Yes ☐ No ☐

23. Has user chosen to employ continuous monitoring techniques for:
pH? If yes, list points _____. SC E.29 & Gen Rpt "Cont-Mon pH Excursions" apply. Yes ☐ No ☒
Temp? If yes, list points _____. SC E.30 & Gen Rpt "Cont-Mon Temp Excursions" apply. Yes ☐ No ☒
LEL? If yes, list points _____. SC E.31 & Gen Rpt "Cont-Mon LEL Excursions" apply. Yes ☐ No ☒

24. Does the company perform any processes for which summaries of activities are needed? Yes ☐ No ☒
If yes, Special Condition E.33 & General Report "Process Activity Summary" apply.

25. Are special billing conditions, other than the standard Special Conditions, needed? Yes ☐ No ☒
If yes, describe: _____
If yes, Special Condition F.4 applies.
Does General Report "Discharge Volume for Billing" apply? Yes ☐ No ☐
Does General Report "Custom Non-Standard" apply? Yes ☐ No ☐

26. Are any Special Conditions, other than the standard special conditions, required? Yes ☒ No ☐
If yes, explain: Due to accessibility problems at sampling point 008, samples may also be collected at sampling point 007 by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.
Does Special Condition B.10☐, or E.21☐ apply? Yes ☐ No ☒
Is supporting documentation attached? Yes ☐ No ☐
Does General Report "Custom Non-Standard" apply? Yes ☐ No ☐

27. Is user a hauled waste industry, discharging its wastewater at the Hauled Waste Station? Yes ☐ No ☒
If yes, have permit title, cover page language, & general conditions been modified? Yes ☐ No ☐
If yes, Special Conditions B.9, D.13, H.1, and H.2 apply.

28. Is user classified as a Categorical Industrial User (CIU)? Yes ☐ No ☒
If yes, complete part 2 of checklist. If no, STOP here.

List all the Special Conditions from Part 1 that are applicable to this permit.
List those that are specific to a sampling point on that sampling point's fact sheet, too.
List those that are not specific to a sampling point on the "Special Conditions Not Tied to Specific SPs" fact sheet, too.

General Report	Special Condition #	Sampling Point #
DIS VOL	F.3	007, 008
RAD REP	E.18	
_____	E.14	002, 003, 004
_____	D.12	007, 008
_____	F.2	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

DOCUMENTATION FORM for PERMIT MODIFICATION

Permit to be Modified:

Company Name: **BRIDGETON LANDFILL LLC**

Location: **13570 St. Charles Rock Road**

Permit No: **0511559802 - 1** Original Effective Date: **12/1/2005**

Modification Effective Date: **9/18/2007**

What is to be Modified:

Briefly explain what is to be modified and then list the pages & how affected::

Sample Point 006 closed; replaced by SP 008. Everything else same.

Pg. # **1 Permit No, Effective Date, Sampling point numbers**

Pg. # **2 Discharge Limits for 007 moved from p.3, unchanged**

Pg. # **3 Discharge Limits for 008 (same as 006, previously on p.2)**

Pg. # **5 First report due date**

Pg. # **9 Special conditions; all 006 references changed to 008**

Pg. # _____ _____

Pg. # _____ _____

Pg. # _____ _____

Reasons for Modification:

Cite regulation, policy, etc. and identify any other documents which support the modification:

Memo from Tom Boehm dated 9-13-07 "Site visit to identify new SP"

Prepared by: Scott Rehmer	Date: 9-17-07
Reviewed by: SMM	Date: 9-18-07

Permit Modified by: Scott Rehmer	Date: 9-17-07

Rev 07/2007

Metropolitan St. Louis Sewer District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
Phone: 314.768.6200 www.stlmsd.com

September 18, 2007

Allen Steinkamp
Environmental Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Discharge Permit No: 0511559802 - 1
For premise at: 13570 St. Charles Rock Road
Bridgeton, MO 63044

Dear Mr. Steinkamp:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit for the premise identified above is hereby modified as per the attached modified permit, with an issue date of September 18, 2007.

The modification made to the permit is as follows:

- Sampling Point 006 is now replaced with the new Sampling Point 008

This letter and the modified permit should be affixed to your original permit as your official record and become a part thereof.

This modification does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and does not in any way relieve you of your obligations to achieve the discharge limitations as provided in the permit.

Please contact us at 314-436-8756 if you have any questions.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Scott M. Rehmer
Assistant Engineer

Enclosures - Industrial Wastewater Discharge Permit

cc Doug Mendoza
Tom Boehm

METROPOLITAN ST. LOUIS SEWER DISTRICT
DIVISION OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 0511559802 - 1

EFFECTIVE DATE: September 18, 2007
EXPIRATION DATE: November 30, 2010

ISSUED TO: BRIDGETON LANDFILL LLC
13570 St Charles Rock Road
Bridgeton, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 2
SAMPLING PT. REF NUMBER(S): 007, 008

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8472, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Scott M. Rehmer
Assistant Engineer

Douglas M. Mendoza, P.E.
Mgr. of Industrial Pretreatment

DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 007

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 250,050

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate (same waste that flows through SP008) + Plant & Equipment Washdown (Transfer station and vehicle washdown)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	0.4	Daily Avg	Once/year
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/3 mo
Cadmium (Total) [mg/L]	0.7	Daily Avg	Once/year
Chemical Oxygen Demand	****	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5.0	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Lead (Total) [mg/L]	0.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	0.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year
Zinc (Total) [mg/L]	3.0	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Gross Alpha, Gross Beta [pCi/L]	*****	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	*****	Daily Avg	Once/3 mo
Uranium (Total) [ug/L]	*****	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring requirement only.

DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 008

SAMPLING POINT LOCATION: 0.5" flexible sampling hose 5' above grade off of an 8" stainless discharge pipe on N side of AST

AVERAGE WASTEWATER FLOW (GPD): 250,050

WASTEWATER SOURCE AND CATEGORY: Landfill Leachate (same waste that flows through SP007) + Plant & Equipment Washdown (Transfer station and vehicle washdown)

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Ammonia (as N)	*****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	0.4	Daily Avg	Once/year
Biochemical Oxygen Demand (5 Day)	****	Daily Avg	Once/3 mo
Cadmium (Total) [mg/L]	0.7	Daily Avg	Once/year
Chemical Oxygen Demand	****	Daily Avg	Once/3 mo
Chromium (Total) [mg/L]	5.0	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Flow [GPD]	***	Daily Avg	***
Lead (Total) [mg/L]	0.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	0.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids	****	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year
Zinc (Total) [mg/L]	3.0	Daily Avg	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Gross Alpha, Gross Beta [pCi/L]	*****	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	*****	Daily Avg	Once/3 mo
Uranium (Total) [ug/L]	*****	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** Monitoring requirement only.

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH and/or temperature at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-C of District Ordinance 8472. The permittee shall include, with each self-monitoring report, a summary of the continuous temperature and/or pH monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, the total time for all excursions for temperature and the total time for all excursions for pH.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 8472. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report, under the terms of this permit, is due by January 28, 2008.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 8472, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 8472.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 8472.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to

continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 8472 Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 8472 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than three (3) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 8472.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 8472.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

SECTION II- SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES

A.1. Non-Standard Special Sampling and Analytical Procedures

Due to accessibility problems at sampling point 008, samples may also be collected at sampling point 007 by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

B. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS

B.1. NPDES Discharge Point

This permit does not regulate discharges at MSD sampling points 002, 003, and 004. These discharges are subject to State regulation under NPDES permit number MO-0112771. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B.2. Radioactive Discharge Reporting Requirements

Permittee discharges radioactive material (i.e. leachate containing radioactive constituents) to the District's sanitary sewers. Such materials must be soluble in water. This authorization may be modified at any time should the District determine that permittee's discharge of radioactive materials, in conjunction with other user's discharges of radioactive materials, causes the aggregate of all radioactive materials entering the District's treatment plant to exceed one (1) curie per year or causes interference as defined in MSD Ordinance 8472.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by permitted radionuclide during the reporting period. The permittee shall also certify compliance with the limits contained in 10 CFR Part 20, appendix B, Table 3 for the permitted radionuclides.

C. SPECIAL BILLING REPORTING REQUIREMENTS

C.1. Reporting Non-Metered Water Consumption

For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling point(s) 007 and 008. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market St.
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

THIS IS THE LAST PAGE OF THIS PERMIT

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

October 25, 2006

Allen Steinkamp
Environmental Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Steinkamp:

Pursuant to your October 16, 2006 letter to the District, relating to the District's October 15, 2006 discharge permit modification for the above premise, the following changes have been incorporated into the aforementioned permit modification.

1) Pages 2 and 3; The reporting units for Uranium at sampling points 006 and 007 have been changed from pCi/L to ug/L.

2) Page 10; Permit special condition II.A.2 has been revised to include defining radioactive material as leachate containing radioactive constituents. Concomitantly, a review of the NRC regulation identified that it only applies to licensees. That being said, Bridgeton Landfill is discharging more radioactive constituents than naturally occurring. Accordingly, special condition II.A.2 has been revised to cite a specific reference to the sewer disposal table in the NRC regulations. The regulation limits radioactive discharge concentrations to safe exposure levels.

The enclosed pages 2, 3, and 10 should replace the previous pages 2, 3, and 10 forwarded to Bridgeton Landfill on October 11, 2006. Additionally, please find enclosed copies of the District's Industrial User Radioactive Materials Discharge Report form for your use, which has been modified for your particular circumstances.

If you have any questions, please contact me at 436-8756.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Enclosures

cc: Permit file
Douglas Mendoza

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 006*****

SAMPLING POINT LOCATION: 1/2" blue spigot in leachate pump vault, 21' NE of NE SW Bell building corner

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Gross Alpha [pCi/L]	******	Daily Avg	Once/3 mo
Gross Beta [pCi/L]	******	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	******	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo
Uranium (Total) [ug/L]	******	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 007*****

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Gross Alpha [pCi/L]	******	Daily Avg	Once/3 mo
Gross Beta [pCi/L]	******	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	******	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo
Uranium (Total) [ug/L]	******	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002, 003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112771**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

2. Permittee discharges radioactive material (i.e. leachate containing radioactive constituents) to the District's sanitary sewers. Such materials must be soluble in water. This authorization may be modified at any time should the District determine that permittee's discharge of radioactive materials, in conjunction with other user's discharges of radioactive materials, causes the aggregate of all radioactive materials entering the District's treatment plant to exceed one (1) curie per year or causes interference as defined in MSD Ordinance 8472.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by permitted radionuclide during the reporting period. The permittee shall also certify compliance with the limits contained in 10 CFR Part 20, Appendix B, Table 3 for the permitted radionuclides.

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

October 11, 2006

Allen Steinkamp
Environmental Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Steinkamp:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on December 1, 2005, for the premise identified above, is hereby modified pursuant to the attached pages 2, 2A, 3, 3A, 10, and 11. This modification adds the requirements to monitor several radioactive pollutants at sampling points 006 and 007, pages 2A and 3A, and one related special condition. This letter and the revised pages 2, 2A, 3, 3A, 10, and 11 should be affixed to your permit as your official record and become a part thereof. These changes were enacted pursuant to your recently submitted report to the District, which identified radioactive pollutants in your effluent.

This modification does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and does not in any way relieve you of your obligations to achieve the discharge limitations as provided in the permit.

Please contact us if you have any questions.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

Enclosures

cc: Permit file

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 006*****

SAMPLING POINT LOCATION: 1/2" blue spigot in leachate pump vault, 21' NE of NE SW Bell building corner

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Gross Alpha [pCi/L]	******	Daily Avg	Once/3 mo
Gross Beta [pCi/L]	******	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	******	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo
Uranium (Total) [pCi/L]	******	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

****** Monitoring requirement only.

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 007*****

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Gross Alpha [pCi/L]	******	Daily Avg	Once/3 mo
Gross Beta [pCi/L]	******	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	******	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo
Uranium (Total) [pCi/L]	******	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

****** Monitoring requirement only.

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002**, **003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112771**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

2. Permittee discharges radioactive material to the District's sanitary sewers. Such materials must be soluble in water. This authorization may be modified at any time should the District determine that permittee's discharge of radioactive materials, in conjunction with other user's discharges of radioactive materials, causes the aggregate of all radioactive materials entering the District's treatment plant to exceed one (1) curie per year or causes interference as defined in MSD Ordinance 8472.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling points **006** and **007**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market Street
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

C. Special Sampling and Analytical Procedures:

1. Due to low discharge rates at sampling point **006**, samples may also be collected at sampling point **007** by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

THIS IS THE LAST PAGE OF THIS PERMIT

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

September 26, 2006

Allen Steinkamp
Environmental Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Steinkamp:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on December 1, 2005, for the premise identified above, is hereby modified pursuant to the attached pages 2, 2A, 3, 3A, 10, and 11. This draft modification adds the requirements to monitor several radioactive pollutants at sampling points 006 and 007, pages 2A and 3A, and one related special condition. These changes were enacted pursuant to your recently submitted report to the District, which identified radioactive pollutants in your effluent.

Please review this draft modification carefully. If you disagree with any of the terms or conditions of the proposed permit modification inform us, in writing, within 15 working days of receipt. Absence of a response within this time frame will be deemed as acceptance of the draft permit and we will proceed to issue the final permit.

Please contact us if you have any questions.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Manager of Industrial Pretreatment

cc: Permit file

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 006*****

SAMPLING POINT LOCATION: 1/2" blue spigot in leachate pump vault, 21' NE of NE SW Bell building corner

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Gross Alpha [pCi/L]	******	Daily Avg	Once/3 mo
Gross Beta [pCi/L]	******	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	******	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo
Uranium (Total) [pCi/L]	******	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section I. of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2. of the Ordinance.

** See Section I.A.2 of the permit conditions.

DRAFT

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

****** Monitoring requirement only.

DRAFT

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 007*****

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	[illegible]	Daily Avg	Once/year
Copper (Total) [mg/L]	[illegible]	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	[illegible]	Daily Avg	Once/year
Mercury (Total) [mg/L]	[illegible]	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Gross Alpha [pCi/L]	******	Daily Avg	Once/3 mo
Gross Beta [pCi/L]	******	Daily Avg	Once/3 mo
Gross Gamma (as Cesium-137) [pCi/L]	******	Daily Avg	Once/3 mo
Radium-226 [pCi/L]	10	Daily Avg	Once/3 mo
Radium-228 [pCi/L]	30	Daily Avg	Once/3 mo
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Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

DRAFT

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

****** Monitoring requirement only.

DRAFT

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M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

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Division of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002, 003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112671**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

2. Permittee discharges radioactive material to the District's sanitary sewers. Such materials must be soluble in water. This authorization may be modified at any time should the District determine that permittee's discharge of radioactive materials, in conjunction with other user's discharges of radioactive materials, causes the aggregate of all radioactive materials entering the District's treatment plant to exceed one (1) curie per year or causes interference as defined in MSD Ordinance 8472.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

DRAFT

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling points **006** and **007**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market Street
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

C. Special Sampling and Analytical Procedures:

1. Due to low discharge rates at sampling point **006**, samples may also be collected at sampling point **007** by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

THIS IS THE LAST PAGE OF THIS PERMIT

DRAFT

PMT FILE (R)

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

DOCUMENTATION FORM for MODIFICATION

GDb: X
P:\ X
ECIMS: X
File: X

Permit to be Modified:

Company Name: BRIDGETON LANDFILL, LLC

Location: 13570 ST. CHARLES ROCK ROAD BRIDGETON, MO 63044

Permit No: 05115598-02 Effective Date: 10-15-06

What is to be Modified:

Briefly explain what is to be modified and then list the pages affected.

Add certain radioactive pollutant monitoring for sampling points 006 & 007.
Add permit special condition E.18 (modified) for radioactive monitoring.

Pg. #2 ADD RADIOACTIVE POLLUTANTS.

Pg. #2A ADD PAGE 2A.

Pg. #3 ADD RADIOACTIVE POLLUTANTS.

Pg. #3A ADD PAGE 3A.

Pg. #10 } → ADD SPECIAL CONDITION E.18 (MODIFIED).

Pg. #11

Pg. #

Reasons for Modification:

Cite regulation, policy, etc. and identify any other documents which support the modification.

SEE ATTACHMENTS.

Prepared by:	FG	Date:	9/25/06
Reviewed by:	DMM	Date:	9-26-06

Permit Modified by: FG	Date: 9/25/06
Entire Permit Reissued?	NO
Only these pages modified:	2, 2A, 3, 3A, 10-11

Rev 12/01

Fabian Grabski

From: Doug Mendoza
Sent: Friday, September 22, 2006 9:01 AM
To: Fabian Grabski
Subject: BRIDGETON LANDFILL LLC [0511559802] permit modification

Fabian,

The following needs to be added to Bridgeton Landfill's permit. The Monitoring Requirements will go under SP006. Send a draft modified permit before the final version. The report that generated this modification is in your inbasket.

Doug

Monitoring Requirements and Discharge Limits:

Radionuclide	Discharge Limit	Frequency
Gross alpha	Monitoring requirement only	once/3 months
Gross Beta	Monitoring requirement only	once/3 months
Gross Gamma (as Cesium-137)	Monitoring requirement only	once/3 months
Radium-226	10 pCi/L	once/3 months
Radium-228	30 pCi/L	once/3 months
Total Uranium	Monitoring requirement only	once/3 months

Modified Special Condition:

Permittee discharges radioactive material to the District's sanitary sewers. Such materials must be soluble in water. This authorization may be modified at any time should the District determine that permittee's discharge of radioactive materials, in conjunction with other user's discharges of radioactive materials, causes the aggregate of all radioactive materials entering the District's treatment plant to exceed one (1) curie per year or causes interference as defined in MSD Ordinance 8472.

The permittee shall include with each quarterly self-monitoring report, on forms supplied by the District, a radioactive materials discharge report. The report shall specify the activity discharged to the sewer system by radionuclide during the reporting period. The permittee shall also certify compliance with state and federal regulations for disposal of radioactive material by release into sanitary sewage.

Fabian Grabski

From: Doug Mendoza
Sent: Friday, September 22, 2006 9:36 AM
To: Fabian Grabski
Subject: RE: Bridgeton modification

I guess so. I was thinking that only MSD monitored as SP007. But I didn't realize both were in the permit.

From: Fabian Grabski
Sent: Friday, September 22, 2006 9:35 AM
To: Doug Mendoza
Subject: Bridgeton modification

Doug,

Your e-mail cited that the new monitoring requirements should fall under SP 006. See the following current special condition in their permit below;

C. Special Sampling and Analytical Procedures:

1. Due to low discharge rates at sampling point 006, samples may also be collected at sampling point 007 by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

Question: Also put pollutants under SP 007???

Fabian

Metropolitan
St. Louis Sewer
District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

October 3, 2005

Allen Steinkamp
Environmental Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Steinkamp:

Enclosed is the Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit for the premise identified above. This permit is issued pursuant to the federal pretreatment regulations in 40 CFR 403 as amended October 3, 2001. This permit has been prepared based on information that you supplied in the District's Industrial User Questionnaire, on results from previous wastewater samplings and inspections and on requirements contained in existing MSD ordinances and state and federal regulations.

Except as noted in this paragraph, the terms and conditions of this permit are substantially the same as in the previous permit. The monitoring frequencies for Chromium and Mercury at sampling points 006 and 007 have been revised from quarterly to annually. Additionally, Section I of the permit conditions has been reorganized and includes additional clarifying language but does not contain any new requirements. Other minor changes may have been made to improve the overall clarity of the document.

The previous permit, effective December 1, 2000, is voided as of the effective date of the enclosed permit.

Monitoring reports required by the conditions of this permit must be submitted quarterly for the life of the permit. The first report due date, for this reissued permit, is based on a complete calendar quarter monitoring period. The permittee remains responsible for reporting for the preceding calendar quarter under the previous permit. Copies of the necessary report forms are enclosed.

If you disagree with any of the terms or conditions of this permit please inform us, in writing, within 15 working days of receipt. Absence of a response within this time frame will be deemed acceptance, by you, of the provisions of this permit.

You may contact us at 436-8756 at any time if you have any question about your permit.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Enclosures

cc: Permit file

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPARTMENT OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 05115598-02

EFFECTIVE DATE: December 01, 2005
EXPIRATION DATE: November 30, 2010

ISSUED TO: BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: TWO
SAMPLING PT. REF NUMBER(S): 006, 007

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8472, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 006*****

SAMPLING POINT LOCATION: 1/2" blue spigot in leachate pump vault, 21' NE of NE SW Bell building corner

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 007*****

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade) .

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH and/or temperature at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-C of District Ordinance 8472. The permittee shall include, with each self-monitoring report, a summary of the continuous temperature and/or pH monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, the total time for all excursions for temperature and the total time for all excursions for pH.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied by the District) shall be submitted to the District's Department of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.

b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.

c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 8472. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report, under the terms of this permit, is due by January 28, 2006.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Department of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Department of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 8472, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 8472.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 8472.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Department of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Department of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 8472 Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Department of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 8472 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than three (3) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 8472.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 8472.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002, 003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112771**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling points **006** and **007**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market Street
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

C. Special Sampling and Analytical Procedures:

1. Due to low discharge rates at sampling point **006**, samples may also be collected at sampling point **007** by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

THIS IS THE LAST PAGE OF THIS PERMIT

Metropolitan
St. Louis Sewer
District

Division of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

August 10, 2005

Allen Steinkamp
Environmental Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Steinkamp:

We have completed our review of your application for renewal of the Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit for the premise identified above. The current permit expires on December 1, 2005. Enclosed is a draft copy of the proposed permit renewal.

Except as noted in this paragraph, the terms and conditions of this draft permit renewal are substantially the same as in the current permit. The monitoring frequencies for Chromium and Mercury at sampling points 006 and 007 have been revised from quarterly to annually. Additionally, Section I of the permit conditions has been reorganized and includes additional clarifying language but does not contain any new requirements. Other minor changes may have been made to improve the overall clarity of the document.

This draft has been prepared pursuant to the federal pretreatment regulations in 40 CFR 403 as amended October 3, 2001 and is based on information that you supplied in the District's Industrial User Questionnaire, on results from previous wastewater samplings and inspections and on requirements contained in existing MSD ordinances and state and federal regulations.

Please review this draft copy carefully. If you disagree with any of the terms or conditions of the proposed permit please inform us, in writing, within 15 working days of receipt. Absence of a response within this time frame will be deemed as acceptance of the draft permit and we will proceed to issue the final permit.

If you have any questions, please contact me at 436-8756.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Enclosure

cc: Permit file

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPARTMENT OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 05115598-02

EFFECTIVE DATE: December 01, 2005
EXPIRATION DATE: November 30, 2010

ISSUED TO: BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: TWO
SAMPLING PT. REF NUMBER(S): 006, 007

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8411, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

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METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 006*****

SAMPLING POINT LOCATION: 1/2" blue spigot in leachate pump vault, 21' NE of NE SW Bell building corner

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

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DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 007*****

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/year
Copper (Total) [mg/L]	7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]		Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/year
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

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PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade) .

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

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3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH and/or temperature at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-C of District Ordinance 8472. The permittee shall include, with each self-monitoring report, a summary of the continuous temperature and/or pH monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, the total time for all excursions for temperature and the total time for all excursions for pH.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied by the District) shall be submitted to the District's Department of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.

b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.

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c. Daily flows, with dates, for all measurements or estimates made within the quarter.
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For the calendar quarter of:	The report must be postmarked no later than:
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April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report, under the terms of this permit, is due by January 28, 2006.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Department of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Department of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

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3. As defined in Article II of District Ordinance 8472, significant new or increased discharge means:

a. Any discharge from a new process or facility or a new source.

b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.

c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.

d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 8472.

e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.

f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 8472.

g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Department of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

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D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Department of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 8472 Article VI Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Department of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 8472 until the District issues a new permit or denies the application.

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I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than three (3) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analysis of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 8472.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 8472.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

DRAFT

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002, 003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-01127**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling points **006** and **007**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market Street
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

DRAFT

C. Special Sampling and Analytical Procedures:

1. Due to low discharge rates at sampling point **006**, samples may also be collected at sampling point **007** by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

THIS IS THE LAST PAGE OF THIS PERMIT

DRAFT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT FACT SHEET

Check one:

FIRST TIME PERMIT	
[redacted]	
REVISION	

Prepared by: **Fabian Grabski**	Date: 06-08-05
Reviewed by: DM	Date: 6-28-05

PERMIT NO: 05115598-02 EFFECTIVE DATE: 12.01.05 EXPIRATION DATE: 11.30.10

MODIFICATION DATES: (1)_____, (2)_____, (3)_____, (4)_____

COMPANY NAME: BRIDGETON LANDFILL, LLC

PREMISE ADDRESS: 13570 ST. CHARLES ROCK ROAD / BRIDGETON, MO 63044

RELATED ACCOUNT NUMBERS: N/A

SIC NUMBER: 4953

TYPE OF OPERATION: LANDFILL

TOTAL NUMBER OF SAMPLING POINTS: 2 or; NO SAMPLE POINT —

NUMBER OF: ORDINANCE 2 CATEGORICAL — COMBINED —

CATEGORICAL INDUSTRY ? YES ___ NO ✓

If Yes, ~~40 CFR ___ Subpart ___ PSES ___ PSNS ___~~

~~40 CFR ___ Subpart ___ PSES ___ PSNS ___~~

EXTRA STRENGTH SURCHARGE ? YES ___ NO ✓ ~~If Yes, BOD ___ COD ___ TSS ___~~

RETURN FACTOR ? YES ___ NO ✓ ~~If Yes, Acct # ___ RF ___~~

SPECIAL CONDITIONS REQUIRED ? YES ✓ NO ___

SUPPORTING DOCUMENTS ATTACHED	YES	NO	N/A
Pollutant & Limitations Documentation Sheets:	✓		
Permit Preparation Checklist:	✓		
Production Based Standards Calculation Sheets:			✓
If Yes, for Sampling Points:			
Most Strict Standards Calculation Sheets:			✓
If Yes, for Sampling Points:			
Combined Wastestream Calculations Sheets:			✓
If Yes, for Sampling Points:			
Other:			

COMMENTS (Include notations of any significant changes from last permit):

SP 006/007; Cr & Hg: 1/3 mos → 1/year monitoring.

PERMIT NO: 05115598 —02

SAMPLING POINT REFERENCE NUMBER: 006 **TYPE:** Ord. ✓ Cat __ Comb __

Wastewater Components: LANDFILL LEACHATE

Flow Rate: 250,000 GPD Basis for Flow Rate: IUQ

General Pollutants: BOD ✓ COD ✓ O&GT ✓ pH ✓ Temp ✓ TSS ✓ Ord TTO ✓

Other: AMMONIA; NATURE OF DISCHARGE.

Priority/Categorical Pollutants: SEE ATTACHMENT.

Basis for Pollutants: STD PMT POLLUTANTS

Basis for Limitations: MSD ORD. #8472

Basis for Monitoring Frequencies: 1/2 mos; VOLUME

Special Conditions: # F.3, # D.12 (NON-STD), # ~~___~~, # ~~___~~, # ~~___~~, # ~~___~~

Any significant changes in Components, Flows, Limits or Monitoring Reqs from previous permit ? YES ✓ NO __

Explain:

SAMPLING POINT REFERENCE NUMBER: 007 **TYPE:** Ord. ✓ Cat __ Comb __

Wastewater Components: LANDFILL LEACHATE

Flow Rate: 250,000 GPD Basis for Flow Rate: IUQ

General Pollutants: BOD ✓ COD ✓ O&GT ✓ pH ✓ Temp ✓ TSS ✓ Ord TTO ✓

Other: AMMONIA; NATURE OF DISCHARGE.

Priority/Categorical Pollutants: SEE ATTACHMENT.

Basis for Pollutants: STD PMT POLLUTANTS

Basis for Limitations: MSD ORD. #8472

Basis for Monitoring Frequencies: 1/2 mos; VOLUME

Special Conditions: # F.3, # D.12 (NON-STD), # ~~___~~, # ~~___~~, # ~~___~~, # ~~___~~

Any significant changes in Components, Flows, Limits or Monitoring Req from previous permit ? YES ✓ NO __

Explain:

SUPPORTING MEMORANDUM

FROM : FABIAN GRABSKI

TO : FACT SHEET

RE : BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

PERMIT : 05115598-02

DATE : 06-27-05

The following outlines which priority pollutants to include for SPs 006 and 007 for Bridgeton Landfill's permit renewal:

Current Permit:
Arsenic (KP) = 1/year: keep at current frequency for permit renewal.
Cadmium (SP) = 1/year: keep at current frequency for permit renewal.
Chromium (KP) = 1/3 mos: All MDL results. Change to 1/year frequency.
Copper (KP) = 1/3 mos: keep at current frequency for permit renewal.
Lead (SP) = 1/year: keep at current frequency for permit renewal.
Mercury (SP) = 1/3 mos: All MDL results. Change to 1/year frequency.
Nickel (KP) = 1/3 mos: keep at current frequency for permit renewal.
Zinc (KP) = 1/3 mos: keep at current frequency for permit renewal.

PERMIT PREPARATION CHECKLIST - PART 1
(Fact Sheet Attachment 2)

Company Name: BRIDGETON LANDFILL, LLC Permit No.: 05115598-02

Effective Date: 12.01.05 Prepared by: **FTG** Date: 06.08.05

REVIEW THE PRETREATMENT DATABASE (ECIMS), INDUSTRY FILE AND PERMIT APPLICATION.

ANSWER THE FOLLOWING QUESTIONS AND UPDATE THE DATABASE PRIOR TO DEVELOPING THE DRAFT PERMIT.

1. Are the correct SICs listed? Yes ✓ No ___
   If no, add: _____ delete: _____

2. Is user in surcharge? Yes ___ No ✓
   If yes, date last certified: _____
   If yes, Special Condition F.2 applies.

3. Does user's premise have more than one MSD account? Yes ___ No ✓
   If yes, were all account numbers correctly listed (including occupant #s)? Yes ___ No ___
   If no, have account numbers been corrected in database before proceeding? Yes ___ No ___

4. Does user have a Return Factor (RF) other than 1.00 for any account? Yes ___ No ✓
   If yes, list acct no., RF and date last updated:
   Acct _____ RF _____ Updated _____
   Acct _____ RF _____ Updated _____
   If yes, Special Condition F.1 applies.

5. Does user discharge water from a source not included in the MSD Billing system? Yes ✓ No ___
   If yes, Special Condition F.3 applies.

6. Have you established agreement among permit application, water consumption records and ECIMS on component flows at each SP, total SP flows and total premise flow? Yes ✓ No ___
   If no, explain _____

7. Has user been granted any variances from ordinance limitations? Yes ___ No ✓
   If yes, Parameter(s) _____ at SP(s) _____
   If yes, Special Condition C.4 applies.

8. Does user discharge any radioactive materials? Yes ___ No ✓
   If yes, Special Condition E.18 applies.

9. Do all of the user's active connections, to MSD sewers, have identified SPs? Yes ✓ No ___
   If no, explain: _____
   If no, is documentation sufficient to use Special Condition E.5, E.6, E.7 or E.8? Yes ___ No ___
   If no, is compliance schedule necessary to obtain documentation? Yes ___ No ___
   If yes, Special Condition G.1 is necessary.

10. Does premise require use of "upstream/downstream" sampling? Yes ___ No ✓
    If yes, Upstream SP # _____ & Downstream SP # _____
    If yes, Special Conditions D.11 and E.9 apply.

11. Are there any inactive connections to MSD sewers? Yes ___ No ✓
    If yes, does Special Condition E10. apply? Yes ___ No ___

12. Have you verified, in ECIMS, the SP location descriptions are complete and adequate? Yes ✓ No ___

13. Have you verified, in ECIMS, the discharge components, process descriptions and related flows at all SPs, are complete and adequate? Yes ✓ No ___

✓

14. Are any SPs Dry Justified? Yes ___ No ✓
If yes, list points _____ and note on P&LD sheets.
If yes, Special Condition E.3 applies.

15. Do any SPs convey stormwater in addition to regulated wastewater? Yes ___ No ✓
If yes, list points: _____ and note on P&LD sheets.
If yes, Special Condition D.10 applies.

16. Does user have any discharges subject to NPDES permitting regulations? Yes ✓ No ___
If yes, list points: 002, 003, 004
If yes, Special Condition E.14 applies.

17. Are there some SPs where user discharges only non-process wastewater? Yes ___ No ✓
If yes, does Special Condition E.3 apply? Yes ___ No ___
If yes, list points _____ and note on P&LD sheets.

18. Is documentation adequate to allow use of grab samples in lieu of composites at any SPs? Yes ___ No ✓
If yes, list points _____ and note on P&LD sheets.
If yes, Special Condition D.1 applies.

19. Are there SPs with less than a quarterly self-monitoring frequency for all parameters? Yes ___ No ✓
If yes, Special Condition E.4 applies.

20. Can user be given a waiver from monitoring local limits TTO at any ordinance SPs? Yes ___ No ✓
If yes, list points _____ and explain on P&LD sheets.

21. Does user have a history of compliance problems at this or a previous location ? Yes ___ No ✓
If yes, is a compliance schedule required? Yes ___ No ___
If yes, Special Condition G.1 applies.
Is supporting documentation attached? Yes ___ No ___

22. Is user required to monitor for Total Phenols at an ordinance SP? Yes ___ No ✓
If yes, does Special Condition D.3 apply? Yes ___ No ___

23. Are special billing conditions, other than the standard Special Conditions, needed? Yes ___ No ✓
If yes, describe: _____

24. Are any Special Conditions, other than the standard special conditions, required? Yes ✓ No ___
If yes, explain: D.12; SAMPLE EITHER AT SP 006 OR 007 (EQUIVALENT)
Is supporting documentation attached? Yes ✓ No ___

25. Is user classified as a Categorical Industrial User (CIU)? Yes ___ No ✓
If yes, complete part 2 of checklist. If no, STOP here.

List all the Special Conditions from Part 1 that are applicable to this permit:

#F.3	#E.14	#D.12	#	#	#	#	#	#
006	002	(NON-SID)						
007	003							
	004							

Rev 12/01

✓

SUPPORTING MEMORANDUM

FROM : FABIAN GRABSKI

TO : PERMIT PREPARATION CHECK LIST

RE : BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

PERMIT : 05115598-02

DATE : 06-08-05

The following presents one non-standard special condition for use in the above draft permit:

D.Non-Standard (D.12)
Due to low discharge rates at sampling point **006**, samples may also be collected at sampling point **007** by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

March 3, 2005

Rick Walker
Operations Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Walker:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on December 1, 2000 for the premise identified above, is hereby modified as per the attached page 8. This modification revises special condition II.B.1 to reflect the proper address to forward your billing reports to. This letter and the revised page 8 should be affixed to your permit as your official record and become a part thereof. This change was identified pursuant to a periodic record review of District records.

This modification does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and does not in any way relieve you of your obligations to achieve the discharge limitations as provided in the permit.

Please contact us if you have any questions.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

Enclosure

cc: Permit file

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

August 4, 2003

Matt Kingsley
Site Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Kingsley:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on December 1, 2000, for the premise identified above, is hereby modified pursuant to the attached pages 1, 2A, 2B, and 9. This modification adds sampling point 007 one related permit special condition. This letter and the revised pages 1, 2A, 2B, and 9 should be affixed to your permit as your official record and become a part thereof. These changes were identified pursuant to recent communication between Jacinta Douma and District employee Martin Blecha.

This modification does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and does not in any way relieve you of your obligations to achieve the discharge limitations as provided in the permit.

Please contact us if you have any questions.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

Enclosure

cc: Permit file

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002**, **003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112771**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling point **006**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2350 Market Street
St. Louis, MO 63103

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

THIS IS THE LAST PAGE OF THIS PERMIT

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPARTMENT OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 05115598-02

EFFECTIVE DATE: December 01, 2000
MODIFICATION DATE: August 11, 2003
EXPIRATION DATE: November 30, 2005

ISSUED TO: BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: TWO
SAMPLING PT. REF NUMBER(S): 006, 007

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8472, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 006*****

SAMPLING POINT LOCATION: 1/2" blue spigot in leachate pump vault, 21' NE of NE SW Bell building corner

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 007*****

SAMPLING POINT LOCATION: 14" pipe into Westlink Pump Station Wetwell, on S side

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

***** See Section **II.C.1** of the permit conditions.

C. Special Sampling and Analytical Procedures:

1. Due to low discharge rates at sampling point **006**, samples may also be collected at sampling point **007** by the District and the permittee. Both sampling points convey the same discharge. Results from either sampling point are considered equivalent for compliance monitoring.

THIS IS THE LAST PAGE OF THIS PERMIT

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

July 30, 2003

Jacinta Douma
General Manager
BRIDGETON LANDFILL LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

Re: Permit No. 05115598-02
Sampling Points

Dear Ms. Douma:

Thank you and your company for the time spent with Martin Blecha of the Metropolitan St. Louis Sewer District. He has been working with Bridgeton Landfill to develop sampling locations that will be acceptable for both Bridgeton Landfill and the District.

As you know, at the sample point recently installed by Bridgeton Landfill (SP006), it can take up to an hour to collect an adequate volume of sample. This is longer than our sampling crews can afford to spend at a single location for the District's compliance monitoring. However, the District was able to identify a line into its Westlink Pump Station, just across Old St. Charles Rock Road from the landfill, that receives only Bridgeton Landfill's leachate discharge. Therefore, the District can use that location for its compliance monitoring. For security reasons, the pump station is kept locked, with only District employees having access. Thus, the point is not accessible by Bridgeton Landfill. This new sample point will be designated SP007.

Mr. Blecha has talked with Allen Steinkamp of Bridgeton Landfill, and we have agreed that Bridgeton Landfill will use SP006 for its self-monitoring. The District will use SP007 for its compliance monitoring. Since the same leachate discharge flows through both points, the results of monitoring will be considered equivalent from either sample point.

We will be revising Bridgeton Landfill's wastewater discharge permit accordingly, and will be sending it to you. If you have any questions, please contact me at 314-436-8717.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

pc Fabian Grabski, Martin Blecha

file-industry & permit

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
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July 30, 2003

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Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

pc Fabian Grabski, Martin Blecha

file-industry & permit

Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

May 30, 2003

Matt Kingsley
Site Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Kingsley:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on December 1, 2000, for the premise identified above, is hereby modified pursuant to the attached pages 1, 2, 2A, and 8. This modification replaces sampling point 005 with new sampling point 006 and amends one related permit special condition. This letter and the revised pages 1, 2, 2A, and 8 should be affixed to your permit as your official record and become a part thereof. These changes were identified pursuant to recent communication between Jacinta Douma and District employee Martin Blecha.

This modification does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and does not in any way relieve you of your obligations to achieve the discharge limitations as provided in the permit.

Please contact us if you have any questions.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

Enclosures

cc: Permit file

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPARTMENT OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 05115598-02

EFFECTIVE DATE: December 01, 2000
MODIFICATION DATE: June 02, 2003
EXPIRATION DATE: November 30, 2005

ISSUED TO: BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: ONE
SAMPLING PT. REF NUMBER(S): 006

SEE PG 1 OTO 8/11/03

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8472, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Douglas M. Mendoza, P.E.
Industrial Waste Engineer

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 005

SAMPLING POINT LOCATION: Spigot on 8" pipe through MH, 20' S of Boenker by Westlink Pump Station.

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

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* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 006

SAMPLING POINT LOCATION: 1/2" blue spigot in leachate pump vault, 21' NE of NE SW Bell building corner

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

SEE PG 2A DTD 8/1/03

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002**, **003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112771**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling point **006**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2000 Hampton Ave.
St. Louis, MO 63139

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

THIS IS THE LAST PAGE OF THIS PERMIT

Metropolitan
St. Louis Sewer
District

Department of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

November 21, 2000

Matt Kingsley
Site Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Kingsley:

Enclosed is the Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit for the premise identified above. This permit is issued pursuant to the federal pretreatment regulations in 40 CFR 403 as amended October 25, 1995. This permit has been prepared based on information that you supplied in the District's Industrial User Questionnaire, on results from previous wastewater samplings and inspections and on requirements contained in existing MSD ordinances and state and federal regulations.

Except as noted in this paragraph, the terms and conditions of this permit are substantially the same as in the previous permit. The monitoring frequencies for Arsenic, Cadmium, and Lead at sampling point 005 have been decreased from quarterly to annually. Additionally, Section I of the permit conditions has been reorganized and includes additional clarifying language but does not contain any new requirements. Other minor changes may have been made to improve the overall clarity of the document.

The previous permit, effective February 1, 1997, is voided as of the effective date of the enclosed permit.

Monitoring reports required by the conditions of this permit must be submitted quarterly for the life of the permit. The first report due date, for this reissued permit, is based on a complete calendar quarter monitoring period. The permittee remains responsible for reporting for the preceding calendar quarter under the previous permit. Copies of the necessary report forms are enclosed.

If you disagree with any of the terms or conditions of this permit please inform us, in writing, within 15 working days of receipt. Absence of a response within this time frame will be deemed acceptance, by you, of the provisions of this permit.

You may contact us at 436-8756 at any time if you have any question about your permit.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Enclosures

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPARTMENT OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 05115598-02

EFFECTIVE DATE: December 01, 2000
EXPIRATION DATE: November 30, 2005

ISSUED TO: BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: ONE
SAMPLING PT. REF NUMBER(S): 005

SEE PG 1 DTD 6/2/3
PG

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8472, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Bob Zeman, P.E.
Manager of Environmental Compliance

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 005

SAMPLING POINT LOCATION: Spigot on 8" pipe through MH, 20' S of Boenker by Westlink Pump Station.

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

SEE PG 2 DTD 6/2/3

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS PG

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
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* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade) .

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH and/or temperature at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-C of District Ordinance 8472. The permittee shall include, with each self-monitoring report, a summary of the continuous temperature and/or pH monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, the total time for all excursions for temperature and the total time for all excursions for pH.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied by the District) shall be submitted to the District's Department of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 8472. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report, under the terms of this permit, is due by January 28, 2001.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Department of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 350 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Department of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 8472, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 8472.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 8472.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Department of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Department of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 8472 Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Department of Environmental Compliance.

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 8472 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than three (3) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 8472.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 8472.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS:

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002**, **003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112771**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling point **005**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2000 Hampton Ave.
St. Louis, MO 63139

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

THIS IS THE LAST PAGE OF THIS PERMIT

Metropolitan
St. Louis Sewer
District

Department of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

October 16, 2000

Matt Kingsley
Site Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

RE: Discharge Permit No: 05115598-02
For premise at: 13570 St. Charles Rock Road

Dear Mr. Kingsley:

We have completed our review of your application for renewal of the Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit for the premise identified above. The current permit expires on November 30, 2000. Enclosed is a draft copy of the proposed permit renewal.

Except as noted in this paragraph, the terms and conditions of this draft permit renewal are substantially the same as in the current permit. The monitoring frequencies for Arsenic, Cadmium, and Lead at sampling point 005 have been decreased from quarterly to annually. Additionally, Section I of the permit conditions has been reorganized and includes additional clarifying language but does not contain any new requirements. Other minor changes may have been made to improve the overall clarity of the document

This draft has been prepared pursuant to the federal pretreatment regulations in 40 CFR 403 as amended October 25, 1995 and is based on information that you supplied in the District's Industrial User Questionnaire, on results from previous wastewater samplings and inspections and on requirements contained in existing MSD ordinances and state and federal regulations.

Please review this draft copy carefully. If you disagree with any of the terms or conditions of the proposed permit please inform us, in writing, within 15 working days of receipt. Absence of a response within this time frame will be deemed as acceptance of the draft permit and we will proceed to issue the final permit.

If you have any questions, please contact me at 436-8756.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Enclosure

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPARTMENT OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 05115598-02

EFFECTIVE DATE: December 01, 2000
EXPIRATION DATE: November 30, 2005

ISSUED TO: BRIDGETON LANDFILL, LLC
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

SIC NUMBER(S): 4953

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: ONE
SAMPLING PT. REF NUMBER(S): 005

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8472, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

DRAFT

METROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Grabski
Assistant Engineer

Bob Zeman, P.E.
Manager of Environmental Compliance

DISCHARGE DESCRIPTION

SAMPLING POINT REFERENCE NUMBER: 005

SAMPLING POINT LOCATION: Spigot on 8" pipe through MH, 20' S of Boenker by Westlink Pump Station.

AVERAGE WASTEWATER FLOW (GPD): 250,000

WASTEWATER SOURCE AND CATEGORY: Landfill leachate

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Oil and Grease (Total) [mg/L]	200	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Ammonia (as N) [mg/L]	****	Daily Avg	Once/3 mo
Arsenic (Total) [mg/L]	.4	Daily Avg	Once/year
Cadmium (Total) [mg/L]	.7	Daily Avg	Once/year
Chromium (Total) [mg/L]	5	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Lead (Total) [mg/L]	.4	Daily Avg	Once/year
Mercury (Total) [mg/L]	.01	Daily Avg	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	5.52	Instant	Once/year

* Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

** See Section I.A.2 of the permit conditions.

*** Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

**** See Section I.A.11 of the permit conditions.

DRAFT

PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade) .

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, **shall be made on-site at the points of discharge** and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

DRAFT

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

a. For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.

b. For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH and/or temperature at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-C of District Ordinance 8472. The permittee shall include, with each self-monitoring report, a summary of the continuous temperature and/or pH monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, the total time for all excursions for temperature and the total time for all excursions for pH.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied by the District) shall be submitted to the District's Department of Environmental Compliance for each calendar quarter. Each report shall include:

a. All facility and sample description information required on the District's reporting form.
b. Analytical results, with dates and times, for all analyzed samples collected within the quarter.
c. Daily flows, with dates, for all measurements or estimates made within the quarter.
d. Any certification statements required pursuant to the Special Conditions in Section II.
e. Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 8472. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

For the calendar quarter of:	The report must be postmarked no later than:
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report, under the terms of this permit, is due by January 28, 2001.**

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10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Department of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 350 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Department of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 8472, significant new or increased discharge means:
   a. Any discharge from a new process or facility or a new source.
   b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
   c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
   d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 8472.
   e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
   f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 8472.
   g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

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C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Department of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

D. BYPASSING PROHIBITED

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
b. There are no feasible alternatives to the bypass; and
c. In the event of an anticipated bypass, advance notice is provided to the District's Department of Environmental Compliance.

E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.
b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 8472 Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Department of Environmental Compliance.

DRAFT

G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 8472 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than three (3) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 8472.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 8472.

DRAFT

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District
Department of Environmental Compliance
10 East Grand Avenue
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Department of Environmental Compliance at (314) 436-8710.

SECTION II - SPECIAL CONDITIONS: SEE PG 8 DD 4/2/3 PG

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

A. Special Certification and Reporting Requirements:

1. This permit does not regulate discharges at MSD sampling points **002**, **003**, and **004**. These discharges are subject to State regulation under NPDES permit number **MO-0112771**. Should the permittee plan to reroute any portion of the flow currently discharged under the NPDES permit to District sewers, the permittee shall notify the District's Department of Environmental Compliance at least ten (10) days prior to the date of the planned change.

B. Special Billing Reporting Requirements:

1. For billing purposes, the permittee shall submit monthly reports of the volume of leachate discharged through sampling point **005**. These reports shall be sent to:

Toni McGarry
MSD Finance Department
2000 Hampton Ave.
St. Louis, MO 63139

The reports shall be sent within 15 days of the end of each month. Copies of the monthly volume reports shall also be included with the routine quarterly self-monitoring reports required pursuant to General Condition I.A.

THIS IS THE LAST PAGE OF THIS PERMIT

DRAFT

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

DOCUMENTATION FORM for MODIFICATION

GDb: X
P:\ X
PIMS: X
File: X

Permit to be Modified:

Company Name: BRIDGETON LANDFILL, LLC

Location: 13570 ST. CHARLES ROCK ROAD BRIDGETON, MO 63044

Permit No: 05115598-02 Effective Date: 03.07.05

What is to be Modified:

Briefly explain what is to be modified and then list the pages affected.

Revise Special Condition F.2 to reflect MSD's new address on Market Street.

Pg. #8 **Revise Special Condition F.2 to reflect MSD's new address on Market Street.** (II.B.1)

~~Pg. #~~

Pg. #

Pg. #

Reasons for Modification:

Cite regulation, policy, etc. and identify any other documents which support the modification.

SEE ATTACHED DOCUMENTS.

Prepared by: FTG	Date: 03.02.05
Reviewed by: DMA	Date: 3-3-05

Permit Modified by: FTG	Date: 03.02.05
Entire Permit Reissued?	NO
Only these pages modified:	8

Rev 12/01

Fabian,

For all permits with requirements to submit info. to our billing division, please send out modifications with referral to 2350 Market St. (I have updated the special condition in PIMS to show the new address.)

The attached shows the affected companies.

I have already written all the non-permitted companies that have to submit info. to Finance.

Doug 8/3/04

17) 0511-5598-02 13570 St. Charles Rock Road – Bridgeton Landfill/Laidlaw Waste
Customer sends monthly readings for discharge flow to Toni McGarry. Usage information is adjusted manually. (Note) We do not bill customer for usage information submitted by MOAM.

18) 3118-6924-00 1233 N. Rock Hill rd. – Rock Hill Quarries
Customer sends monthly readings for leachate discharge. This usage is combined with usage submitted by MOAM. (Note) MOAM submits usage information quarterly. 1/3 of quarterly reading is combined with monthly reading submitted by customer. Usage information is adjusted manually. An RF of .98 is currently in effect.

19) 8014-0327-00 153 James S. McDonnell – McDonnell Douglas Corporation
The water usage for ten accounts are combined and applied to this account. Usage unformation is adjusted manually every three months. This account also receives a .56RF on the total ccfs from all ten accounts. Other account numbers are 9000-4579, 9000-4580, 9000-4581, 9000-4583, 9000-4584, 9000-4586, 9000-4587, 9000-4588, 9000-4590.

20) 8115-0000-01 0000 Lambert International Airport
The water usage for fifteen accounts are combined and applied ot this account. Usage information is adjusted manually every three months. Only the water usage on this account receives a .53 RF before the ccfs are totaled. Other account numbers are 8115-0003, 8115-0004, 8115-0007, 8115-0009, 8115-0010, 8115-0011, 8115-0012, 8115-0014, 8115-0017, 8115-0020, 8115-0022, 8115-0024, 8115-0026, 8115-0027.

21) 1118-6928-00 1050 Research Blvd. – St. Louis County Water Company
Bill 52 ccfs/mo per memo from Steve Souris with OEC dated 2/17/2001. Usage information is adjusted manually every three months.

22) 3118-4765-00 5601 Lucas and Hunt – Norwood Hills Country Club
Alternate billing 762 and 763 ccfs every each month. No reason given. Steve is currently working on this facility. Usage information is adjusted manually .

23) 5115-0100-01 0000 Various – City of St. Louis Water Division
Bill 376 ccfs/mo per OEC. Usage information is adjusted manually every three months.

24) 5115-0800-03 0000 City Accounts – Darlene Green, Comptroller
This account consists of about 40 city accounts for which water consumption meters were not available. Bill 23,200 ccfs/mo per memo from Steve Souris with OEC dated 3/02. Usage information is adjusted manually every three months.

25) 5116-0000-01 0000 Police Department Locations – Board of Police Commissioners
Bill 1000 ccfs/mo per OEC, per last comment 6/17/94. Usage information is adjusted manually every three months.

26) 8414-3391-00 10751 Natural Bridge – Host Marriott
Monthly meter readings measuring the volume of water used are submitted by Walter Eggebrecht with Host Marriott to Toni McGarry every three months. We apply a dollar adjustment for extra strength surcharges. Their monthly wastewater user charges are billed to St Louis International Airport as part of MSD account #8115-0007-01.

27) 2118-5874-01 7151 N. Market – Able Industries
Customer sends monthly readings for their volume of portable toilet wastewater discharged. This usage is combined with usage submitted by MOAM. (Note) MOAM submits usage information quarterly. 1/3 of quarterly reading is combined with monthly reading submitted by customer. Usage information is adjusted manually. We also apply a dollar adjustment for extra strength surcharges.

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

DOCUMENTATION FORM for MODIFICATION

GDb: X
P:\ X
ECIMS: X
File: X

Permit to be Modified:

Company Name: BRIDGETON LANDFILL, LLC

Location: 13570 ST. CHARLES ROCK ROAD BRIDGETON, MO 63044

Permit No: 05115598-02 Effective Date: 08-11-03

What is to be Modified:

Briefly explain what is to be modified and then list the pages affected.

ADD SP 007 & II.C.1.

Pg. #1 ① ADD 8/11/3 MOD DATE. ② ADD SP 007.

Pg. #2A ① ADD "*****" & II.C.1 REFERANCE.

Pg. #2B ① ADD PG 2B. ② ADD NEW SP 007.

Pg. #9 ① ADD PG 9. ② ADD II.C.1.

Reasons for Modification:

Cite regulation, policy, etc. and identify any other documents which support the modification.

SEE ATTACHMENTS. FG

Prepared by: FG	Date: 7-9-03
Reviewed by: DMM	Date: 8-1-03

Permit Modified by: FG	Date: 7-9-03
Entire Permit Reissued?	— NO —
Only these pages modified:	1, 2A, 2B, 09

Rev 12/01

DEPARTMENT MEMO - ENVIRONMENTAL COMPLIANCE

TO: INDUSTRY FILE: Bridgeton Landfill, LLC

ACCT #: 051155298-02

FROM: Martin J. Blecha MJB

DATE: July 28, 2003

RE: New MSD sample point, Bridgeton L.F. will continue to sample at SP 006.

Bridgeton provided a sample point at their new Leachate Pump Vault, "see MEMO dated June 6, 2003." The new sample point is inadequate for MSD sampling. The flow rate is so slow that it can take 30 minutes to collect a sample. Jacinta Douma suggested that an alternative sample point could be established in the new Westlink Pump Station.

In a site visit at the Westlink Pump Station and a review of engineering drawings a suitable sample point was determined. MSD Operator Supervisor - Morris Write gave me the key to open the locks to the front gate, and the pump station vault. The key is to be used only by MSD personnel.

On July 28, 2003 I reached Allen Steinkamp, Bridgeton Landfill Environmental Manager by phone. Since they would not be able to sample at the Westlink Pump Station he agreed to use their existing Sample Point 006 at their Leachate Pump Station. He is Jacinta Douma Supervisor, and will inform her of our phone conversation.

Mr. Stienkamp is informed that the sewer permit will be revised. He plans to review the permit when it is completed.

Fabian,

See attached memo, then forward memo to file.

Permit will need to be revised to add a special condition that states something like: due to low discharge rate through sampling port at sample point 006, samples may also be collected at (description for SP007) by the District. Both points collect the same flow, and results will be considered equivalent from either sample point.

Doug
7/30/03

DEPARTMENT MEMO - ENVIRONMENTAL COMPLIANCE

TO: INDUSTRY FILE: Bridgeton Landfill, LLC

ACCT #: 05112298-02

FROM: Martin J. Blecha MJB

DATE: June 6, 2003

RE: SP 006 that replaced SP 005 is inadequate.

I contacted Jacinta Douma by phone on June 5, 2003, regarding John Brockman's recent visit. Mr. Brockman was unable to collect a sample from the spigot in the new Leachate Pump Vault. Landfill gas vented from the spigot instead of landfill leachate.

Ms. Douma explained that you have to wait for the gas to vent out. Then leachate sputters out of the spigot. It takes approximately 20 minutes to fill a 1-liter sampling container. I then contacted Paul Slovacek. He said that would take too much of the sampler's time. The sample point is unacceptable.

I called Ms. Douma and asked if there is some way to increase the leachate flow through the spigot. We discussed relocating the end of the spigot line from the top of the leachate pipe to the bottom of the leachate pipe. She is concerned that drilling another hole into the pipe may affect the pipes structural integrity.

Another issue brought up was what the additional cost would be. They believe that their contractor was given approval for the design of the sampling device, she said. I spoke to Doug Mendoza and there have been no plans for a sample point submitted for a sample point.

Paul Slovecek and I plan to make a site visit to discuss the problem and a solution that we can all agree on.

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

FACT SHEET

Check If:
FIRST TIME PERMIT: ✓
PERMIT RENEWAL: ✓
PERMIT REVISION: ___

Prepared by: FTG
Date: 08.08.00
Checked by: BJ
Date: 10/13/00

PERMIT NO: 05115598-02 EFFECTIVE DATE: 12.01.00

EXPIRATION DATE: 11.30.05
MODIFICATION DATE(S): 6/2/3
8/11/03

OTHER ACCOUNT NUMBERS: NONE

COMPANY NAME: BRIDGETON LANDFILL, LLC

PREMISE ADDRESS: 13570 ST. CHARLES ROCK RD. BRIDGETON, MO 63044

SIC NUMBER(S): 4953

TYPE OF OPERATION: LANDFILL.

TOTAL NUMBER OF SAMPLING POINTS: ~~ONE~~ 2 8/11/03
NUMBER OF: ORDINANCE ~~1~~ 2 CATEGORICAL___ COMBINED___

CATEGORICAL INDUSTRY: YES___ NO ✓
IF YES, 40 CFR_____ SUBPART_____

EXTRA STRENGTH SURCHARGE: YES___ NO ✓
IF YES, BOD:_____ COD:_____ TSS:_____

RETURN FACTOR: YES___ NO ✓ IF YES, PERCENT (%):_____

SPECIAL CONDITIONS: YES ✓ NO___

SUPPORTING DOCUMENTS ATTACHED:

PERMIT PREPARATION CHECK LIST: YES ✓ NO___
POLLUTANT & LIMITATIONS DOCUMENTATION SHEETS: YES ✓ NO___
PRODUCTION BASED STDS CALCULATION SHEETS: YES___ NO___ N/A ✓
IF YES, FOR SAMPLING POINT:_____
MOST STRICT STANDARDS CALCULATION SHEETS: YES___ NO___ N/A ✓
IF YES, FOR SAMPLING POINT:_____
COMBINED WASTESTREAMS CALCULATION SHEETS: YES___ NO___ N/A ✓
IF YES, FOR SAMPLING POINT:_____
OTHER:_____

COMMENTS:_____

PERMIT NO: 05115598-02

SAMPLING POINT REFERENCE NUMBER: ~~005~~ 006 6/2/3 PG

WASTEWATER SOURCES: LEACHATE
FLOW RATE (GPD): 250,000
BASIS FOR FLOW RATE: IUQ

GENERAL POLLUTANTS:
BOD ✓ COD ✓ O & G ✓ PH ✓ TEMP ✓ TSS ✓
OTHER AMMONIA (N)

PRIORITY POLLUTANTS: TTO, Cr, Cu, Hg, Ni, Zn | As, Cd, Pb
ONCE/YEAR

BASIS FOR POLLUTANTS & LIMITATIONS:
TTO: MSD ORD #8472.

Cr, Cu, Hg, Ni, Zn: SEE ATTACHED MEMO.

SPECIAL CONDITION(S) REQUIRED: YES____ NO ✓
IF YES, #____ #____ #____ #____ IS APPLICABLE.

~~SAMPLING POINT REFERENCE NUMBER:~~

~~WASTEWATER SOURCES:~~
~~FLOW RATE (GPD):~~
~~BASIS FOR FLOW RATE:~~

~~GENERAL POLLUTANTS:~~
~~BOD COD O & G PH TEMP TSS~~
~~OTHER~~

~~PRIORITY POLLUTANTS:~~

~~BASIS FOR POLLUTANTS & LIMITATIONS:~~

~~SPECIAL CONDITION(S) REQUIRED: YES NO~~
~~IF YES, # # # # IS APPLICABLE.~~

SUPPORTING MEMORANDUM

FROM : FABIAN GRABSKI

TO : PERMIT FACT SHEET

RE : BRIDGETON LANDFILL, LLC.
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MO 63044

PERMIT : 05115598-02

DATE : 10-13-00

The following presents justification for which metals are to be included at sampling point 005 for the permit renewal:

06-12-00 IUO KP/SP Pollutants	Current permit
Cyanide (SP)	------
Antimony (SP)	------
Arsenic (SP)	Arsenic
Beryllium (SP)	------
Cadmium (KP)	Cadmium
Chromium (KP)	Chromium
Copper (KP)	Copper
Lead (KP)	Lead
Mercury (SP)	Mercury
Nickel (KP)	Nickel
Selenium (SP)	------
Silver (SP)	------
Thallium (SP)	------
Zinc (KP)	Zinc

Cyanide (SP):
Not in permit. Include in Field Sampling Requirements.

Antimony (SP):
Not in permit. Include in Field Sampling Requirements.

Arsenic (SP):
Previous data shows predominantly MDL results. Decrease permit frequency to annual monitoring. Retain in Field Sampling Requirements.

Beryllium (SP):
Not in permit. Include in Field Sampling Requirements.

Cadmium (KP):
Although KP, previous data shows predominantly MDL results. Decrease permit frequency to annual monitoring. Retain in Field Sampling Requirements.

Chromium (KP):
Previous data shows results of analysis above MDLs. Retain in permit and in Field Sampling Requirements.

Copper (KP):
Previous data shows results of analysis above MDLs and at MDLs. Retain in permit and in Field Sampling Requirements.

Lead (KP):
Although KP, previous data shows predominantly MDL results. Decrease permit frequency to annual monitoring. Retain in Field Sampling Requirements.

Mercury (SP):
Previous data shows predominantly MDL results. However, the Ordinance limit is extremely stringent. Accordingly, retain in permit and Field Sampling Requirements.

Nickel (KP):
Previous data shows results of analysis above MDLs and at MDLs. Retain in permit and in Field Sampling Requirements.

Selenium (SP):
Not in permit. Include in Field Sampling Requirements.

Silver (SP):
Not in permit. Include in Field Sampling Requirements.

Thallium (SP):
Not in permit. Include in Field Sampling Requirements.

Zinc (SP):
Previous data shows results of analysis above MDLs and at MDLs. Retain in permit and in Field Sampling Requirements.

Company Name: BRIDGETON LANDFILL, LLC Cat 49

Acct. Number: 06115598-02 Date: 08-08-00

Prepared By: FG

Reviewed By / Date:

_____/_____

_____/_____

PERMIT PREPARATION CHECK LIST (Rev 02/29/96)

REVIEW THE PRETREATMENT DATABASE AND INDUSTRY FILE. ANSWER THE FOLLOWING QUESTIONS AND UPDATE THE DATABASE PRIOR TO DEVELOPING THE DRAFT PERMIT. ATTACH COMPLETED CHECK LIST TO PERMIT FACT SHEET.

1. Are the correct SIC numbers listed? ✓ Yes ___ No
   If No - add:_____.
   - delete:_____.

2. Is user in surcharge - Category 2? ___ Yes ✓ No
   If Yes - date last certified:_____.
   Special Condition F.2 is applicable.

3. Does user have more than one water account? ___ Yes ✓ No
   If Yes - is PSIM using the most appropriate account number? ___ Yes ___ No
   If No - what account number should be used?
   #_____. Prepare Jar 019 request.

4. If user has only one water account, do the discharge factors provide an accurate representation of the flows at each sampling point? ___ N/A ✓ Yes ___ No
   If No - explain:_____.

5. Does user have a return factor less than 1.00 for any account? ___ Yes ✓ No
   If Yes - list account number, return factor and date updated:
   #_____ RF_____ UPDATED_____.
   #_____ RF_____ UPDATED_____.
   Special Condition F.1 is applicable.

6. Does user discharge water from a source not included in MSD's billing system? ✓ Yes ___ No
   If Yes - Special Condition F.3 is applicable.

7. Has user been granted a variance from an ordinance limitation? ___ Yes ✓ No
   If Yes - parameter(s)_____at sampling point(s)_____.
   Special Condition C.4 is applicable.

8. Does user discharge any radioactive waste? ___ Yes ✓ No
   If Yes - Special Condition E.18 is applicable?

9. Do all of the user's active connections, to the District sewers, have identified sampling points? ✓ Yes ___ No
   If No - how many do not? _____.
   Explain:_____.
   If No - can Special Condition E.5, E.6, E.7 or E.8 be used? ___ Yes ___ No
   If Yes - is documentation sufficient? ___ Yes ___ No
   If No - is compl schedule necessary to establish documentation? ___ Yes ___ No
   If Yes - Special Condition G.1 is applicable.

10. Does user have upstream/downstream sampling points? ___ Yes ✓ No
    If Yes - upstream # _____ & downstream # _____.
    If Yes - Special Conditions D.11 and E.9 are applicable.

Acct. Number: 05115598-02

11. Are there any inactive wastewater connections to District sewers? ___Yes ✓No
    If Yes - does Special Condition E.10 apply? ___Yes ___No

12. Do the Sampling Point Location comments specifically locate the sampling point(s)? ✓Yes ___No

13. Do the Wastewater Source and Category comments accurately identify the wastewater discharged and the applicable categorical standards? ✓Yes ___No

14. Are there any sampling points identified as Dry Justified? ___Yes ✓No
    If Yes - which sampling point(s) _____.
    Special Condition E.3 is applicable.

15. Are there sampling points which convey stormwater in addition to wastewater? ___Yes ✓No
    If Yes - which sampling point(s): _____.
    Special Condition D.10 is applicable.

16. Are there sampling points subject to a NPDES permit? ✓Yes ___No
    If Yes - which sampling point(s) 002, 003, & 004.
    Special Condition (E.14) is applicable.

17. Does user discharge any process waste? ✓Yes ___No *
    If No - does Special Condition B.1, B.2 or B.3 apply? ___Yes ___No

    *LEACHATE

18. Are there sampling points which convey no process waste flows? ___Yes ✓No
    If Yes - does Special Condition E.3 apply? ___Yes ___No
    If Yes - which sampling point(s): _____.

19. Can grab samples be used in lieu of composite samples? ___Yes ✓No
    If Yes - which sampling point(s): _____.
    If Yes - is documentation adequate? ___Yes ___No
    Special Condition D.1 is applicable.

20. Are there sampling points with less than quarterly sampling frequency for all parameters? ___Yes ✓No
    If Yes - which sampling point(s): _____.
    Special Condition E.4 is applicable.

21. Do the ordinance discharge limits correspond to the watershed? ✓Yes ___No
    Watershed is classified small____ or large ✓ river.

22. Are all applicable priority pollutants listed at ordinance sampling points? ✓Yes ___No
    If No - add: _____.
    - delete: _____.

23. Can user be exempted from monitoring for local limits TTO at any ordinance sampling point(s)? ___Yes ✓No
    If Yes - which sampling point(s) _____.
    If Yes - explain _____

Acct. Number: 05116598-02

24. Does user have a history of compliance problems at this or a previous location? ___Yes ✓ No
    If Yes - is a compliance schedule required? ___Yes___No
    If Yes - Special Condition G.1 is applicable.

25. Is user a categorical user? ___Yes ✓ No
    If No - questions 26 through 39 can be skipped.

26. Do any sampling points have both Ordinance & Categorical limits? ___Yes___No
    If Yes - which sampling point(s):_____.
    Special Condition C.3 is applicable. Attach worksheet.

27. Is the Combined Wastestream Formula (CWF) required? ___Yes___No
    If Yes - which sampling point(s):_____.
    If Yes - date last calculated:_____.
    Special Condition C.2 is applicable. Attach CWF worksheet.

28. Are there process discharges, from a categorical operation, for which standards have not been promulgated? ___Yes___No
    If Yes - which sampling point(s):_____.
    Is Special Condition E.20 applicable? ___Yes___No

29. Are categorical limitations based on production rates? ___Yes___No
    If Yes - which sampling point(s):_____.
    If Yes - date last calculated:_____.
    Do Special Conditions C.1, E.1 or E.2 apply? ___Yes___No
    If Yes - which Special Condition(s):_____.

30. Are categorical limitations mass limits? ___Yes___No
    If Yes - which sampling point(s):_____.
    Special Condition E.19 is applicable.

31. Is user a job shop electroplater with >10,000 gpd? ___Yes___No
    If Yes - Special Condition D.2 is applicable.

32. Is user a soap and detergent manufacturer subject to 40 CFR 417? ___Yes___No
    If Yes - are they subject to Subparts O__, P__, Q__ or R__? ___Yes___No
    If Yes - for Subpart O, Special Condition B.4 is applicable.
    If Yes - for Subpart P, Special Condition B.5 is applicable.
    If Yes - for Subpart Q, Special Condition B.6 is applicable.
    If Yes - for Subpart R, Special Condition B.7 is applicable.

33. Is user a leather tanner/finisher subject to 40 CFR 425? ___Yes___No
    If Yes - under Appendix A, Special Condition D.6 is applicable.
    If Yes - under Appendix B, Special Condition D.7 is applicable.

34. Is user a pharmaceutical manufacturer subject to 40 CFR 439? ___Yes___No
    If Yes - have they certified to the absence of cyanide? ___Yes___No
    If Yes - Special Condition E.15 is applicable.
    If No - must total cyanide limitations be adjusted? ___Yes___No
    If Yes - calculate adjusted limitations. Attach worksheet.

35. Is user a metal molder/caster subject to 40 CFR 464? ___Yes___No
    If Yes - Special Condition D.4 is applicable.

Acct. Number: 05115598-02

36. Is user a coil coater subject to 40 CFR 465? ___Yes___No
    If Yes - Special Conditions D.5 and E.16 are applicable.
    If Yes - is user subject to 40 CFR 465 Subpart D? ___Yes___No
      If Yes - Special Conditions D.9 and E.17 are applicable.
      If Yes - is there a separate categorical sampling point for the regulated waste? ___Yes___No
        If Yes - include O&G (Hydrocarbon) in the list of parameters at the categorical sampling point.
        If No - and categorical waste discharges at a combined ord/cat sampling point, include O&G (Total) and O&G (Hydrocarbon) in the list of parameters at the combined sampling point.

37. Do any sampling points have both Ordinance & Categorical TTO limits? ___Yes___No
    If Yes - which sampling point(s):_____.
    Is Special Condition E.13 applicable? ___Yes___No
      If Yes - explain:_____.

38. Can user certify, in lieu of monitoring, for categorical TTO at a categorical or combined sampling point? ___Yes___No
    If Yes - which sampling point(s):_____.
    Special Condition E.11 ____ or E.12 ____ is applicable.

39. May user monitor for Oil & Grease, in lieu of TTO, at a categorical sampling point? ___Yes___No
    If Yes - which sampling point(s):_____.
    If Yes - Special Condition D.8 is applicable.
    If Yes - is a modification of Special Condition E.13 applicable? ___Yes___No

40. Is user required to monitor for Total Phenols? ___Yes ✓No
    If Yes - is Special Condition D.3 applicable? ___Yes___No

41. Are all SARA Data pollutants monitored? ✓N/A___Yes___No
    If No - do additional pollutants need to be monitored? ___Yes___No
    If Yes - list pollutant(s):_____.

42. Are all Haz Waste Report (403.12(p)) pollutants monitored? ✓N/A___Yes___No
    If No - do additional pollutants need to be monitored? ___Yes___No
    If Yes - list pollutant(s):_____.

43. Are there any special billing provisions, not previously listed, that require a Special Condition in the permit? ___Yes ✓No
    If Yes - describe:

    _____

    _____

44. Are any Special Conditions other than the standard Special Conditions needed? ___Yes ✓No
    If Yes - please describe:

    _____

    _____

    _____

Acct. Number: 05115698-02

SUMMARY: List all the Special Conditions applicable to this permit:

#E.14 #F.3 #_____ #_____ #_____ #_____ #_____ #_____ #_____

If Special Condition G.1 is applicable, outline the requirements & dates below:

_____

_____

_____

_____

_____

_____

_____

_____

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

DOCUMENTATION FORM for MODIFICATION

GDb: X
P:\ X
ECIMS: X
File: ___

Permit to be Modified:

Company Name: BRIDGETON LANDFILL, LLC

Location: 13570 ST. CHARLES ROCK ROAD BRIDGETON, MO 63044

Permit No: 05115598-02 Effective Date: 06.02.03

What is to be Modified:

Briefly explain what is to be modified and then list the pages affected.

REPLACE SP 005 w/ SP 006.

Pg. #1 REPLACE 005 REFERENCE w/ 006.

Pg. #2 ADD "THIS PAGE VOID".

Pg. #2A ADD PAGE 2A. ADD SP 006.

Pg. #8 REPLACE 005 w/ 006 FOR II.B.1 (F.3)

Reasons for Modification:

Cite regulation, policy, etc. and identify any other documents which support the modification.

SEE NEXT PAGE.

Prepared by:	FG	Date:	5/29/03
Reviewed by:	DMM	Date:	5-29-03

Permit Modified by: FG	Date: 5/29/03
Entire Permit Reissued?	~NO~
Only these pages modified:	~1, 2, 2A, & 8~

Rev 12/01

Permit Fact Sheet Copy

METROPOLITAN
ST. LOUIS SEWER
DISTRICT

REQUEST FOR INVESTIGATION OF SAMPLE POINT PROBLEM

SAMPLING DATE: 04/11/2003
CONTACT PERSON:
COMPANY NAME: Bidgeton Landfill LLC
ZIP: 63044
COMPANY ADDRESS: 13570 St. Charles Rock Rd.
ACCOUNT NUMBER: 0511559802
CATEGORY: NON-SURCHARGE SIU
FLOW: SP005 **SMN:** 0398823 **Tech:** R. Newman

SAMPLE POINT AND TYPE OF PROBLEM: Roger spoke with Jacinta Douma who is the General Manager (393-1660). She informed him that they have a new sampling point being constructed. This is the third time I have tried to sample this SIU this fiscal year. If they have the new sampling point completed in time to collect a sample this fiscal year, would let me know as soon as possible? Thanks!

PERSON REQUESTING INVESTIGATION: Paul Slovacek

INVESTIGATOR ASSIGNED: Martin Blecha
ASSIGNED BY: DMM 4/15/03

CORRECTIVE ACTION TAKEN: The new leachate vault is now operating. It pumps all of the landfill leachate to MSD Westlink Pump Station. A ½" blue spigot is provided to for MSD sampling. New SP Map made.

FOLLOW UP NEEDED: None

INVESTIGATOR: Martin Blecha
DATE: 5-27-03

SRF-01/12-30-93

— New SP006 replaces SP005 (005 gone due to construction, etc.)

— inactivate 0254 lateral 05

— DMM

UNITED STATES POSTAL SERVICE

ST. LOUIS MO
PM

Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPT. of ENVIRONMENTAL COMPLIANCE
10 EAST GRAND AVENUE
ST. LOUIS, MISSOURI 63147

3147/2388

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Matt Kingsley
Site Manager
BRIDGETON LANDFILL, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly): Danette Craig
B. Date of Delivery: 11-28-06

C. Signature
X Danette Craig
☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label) 7099 3400 001 8506 6150

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M

FOR MSD USE ONLY			
ACCOUNT NUMBER: 051555R-02		CATEGORY:	1 2 3 4 5 6 8
TA: MO			
TS: FMAIN	FG Reviewer's Initials	06-12-00 Date	

METROPOLITAN ST. LOUIS SEWER DISTRICT
DEPARTMENT OF ENVIRONMENTAL COMPLIANCE
INDUSTRIAL USER QUESTIONNAIRE

Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit be required for your facility, the information in this questionnaire will be used to issue the permit.

RECEIVED
JUN 12 2000
Environmental Compliance

SECTION A - GENERAL INFORMATION

1. Company Name: Bridgeton Landfill, LLC.
2. Mailing Address: 13570 St. Charles Rock Road
   Bridgeton, Missouri Zip Code 63044
3. Premise Address: 13570 St. Charles Rock Road
   Bridgeton, Missouri Zip Code 63044
4. Person Authorized to Sign Reporting Documents:
   Name and Title: Matt Kingsley - Site Manager
   Tel No. (314) 739-1919
5. Check one: [X] Existing Discharge
   [] Proposed Discharge If proposed, indicate discharge start date: _____
6. Shift Information:
   a. Number of shifts per work day: 3 and work days per week: 6
   b. Average number of employees per shift: 1st 19 2nd 5 3rd 2 Total: 26
   c. Shift start times: 1st 0700 2nd 1500 3rd 2300

SECTION B - PRODUCT OR SERVICE INFORMATION

1. Briefly describe the primary manufacturing or service activities at the premise address and list the applicable SIC number for each activity:

	PRIMARY ACTIVITIES	SIC NUMBER
a.	Sanitary Landfill	4953
b.		
c.		
d.		

Company Name: Bridgeton Landfill, LLC.
Premise Address: 13570 St. Charles Rock Road,
Account Number: 05115598-02

SECTION B - PRODUCT OR SERVICE INFORMATION (Cont'd)

2. Are primary activities generally batch or continuous processes? [] batch [X] continuous
3. Principal raw materials used: N/A
4. Principal products produced: N/A
5. Check all activities which are conducted at your premise in addition to the primary activities described in B.1 above. Indicate the SIC number, if known. Do not check activities which are already included in B.1.

	SIC NO.		SIC NO.
[] Adhesive & Sealants Mfg.		[] Mineral Mining & Processing	
[] Aluminum Forming		[] Nonferrous Metals Forming	
[] Asbestos Mfg.		[] Nonferrous Metals Mfg	
[] Battery Mfg.		[] Organic Chem., Plastics & Synthetic Fibers Mfg	
[] Builder's Paper and Roofing Felt Mfg.		[] Paint Formulating	
[] Carbon Black Mfg.		[] Painting, Finishing or Paint Stripping	
[] Cement Mfg.		[] Parts Washing	
[] Coil Coating		[] Paving and Roofing Materials	
[] Copper Forming		[] Pesticide Chem. Mfg., Formulating, Packaging	
[] Dairy Products Processing		[] Petroleum Refining	
[] Drum Reconditioning		[] Pharmaceutical Mfg	
[] Electrical and Electronic Components		[] Phosphate Mfg	
[] Electroplating		[] Photographic Processing	
[] Explosive Mfg.		[] Plastic Molding and Forming	
[] Feedlots		[] Porcelain Enameling	
[] Ferroalloy Mfg.		[] Printing & Publishing	
[] Fertilizer Mfg.		[] Pulp, Paper & Paperboard Mfg	
[] Food Preparation		[] Q. C. Laboratory	
[] Fruits and Vegetable Processing		[] R & D Laboratory	
[] General Offices		[] Radioactive Materials Processing	
[] Glass Mfg.		[] Repair Shop, Garage	
[] Grain Milling		[] Rubber & Rubber Prod. Mfg.	
[] Gum & Wood Chemical Mfg.		[] Seafood Processing	
[] Hazardous Waste Treatment, Storage or Disposal		[] Soap and Detergent Mfg.	
[] Health Care & Hospital		[] Solvent Recycling	
[] Industrial Laundry		[] Steam Electric Power Generation	
[] Ink Formulating		[] Sugar Processing	
[] Inorganic Chemicals Mfg.		[] Textile Mills	
[] Iron and Steel Mfg.		[] Timber Products Mfg.	
[] Leather Tanning and Finishing		[] Transportation Equipment Cleaning	
[] Machine Shop		[] Transportation Services	
[] Machinery Mfg. or Rebuilding		[] Used Oil Reclamation	
[] Meat Processing		[] Vehicle/equipment Washing	
[] Metal Finishing		[] Warehousing	
[] Metal Molding and Casting		[] Waste Recycling	
		[] Others	

6. Are your processes subject to seasonal variation? [] Yes [X] No
If "Yes," explain and indicate the month(s) of peak activity.

RECEIVED
JUN 12 2000
Environmental Compliance

Company Name: Bridgeton Landfill, LLC.
Premise Address: 13570 St. Charles Rock Road
Account Number: 05115598-02

SECTION C - WATER CONSUMPTION AND WASTEWATER DISCHARGES

1. Raw Water Source(s):
   - [] City of St. Louis Water Div.
   - [] St. Louis Co. Water Co.
   - [] Other Municipal Source _____
   - [X] Hauled by Contractor
   - [] Surface water
   - [] Private Well
   - [] Other (describe) _____

2. Water Bill Addressee: Bridgeton Landfill, LLC.
3. Water Service Account Numbers: unknown
4. List past twelve months water usage from:

				[] Water Bills	[] Other Sources
a. 1st quarter	_____19__	through	_____19__	_____Ccf	_____Ccf
b. 2nd quarter	_____19__	through	_____19__	_____Ccf	_____Ccf
c. 3rd quarter	_____19__	through	_____19__	_____Ccf	_____Ccf
d. 4th quarter	_____19__	through	_____19__	_____Ccf	_____Ccf

5. Describe any treatment or conditioning process performed on the raw water before use: none

6. Identify all water uses within your facility:

Water Uses	Estimated average daily use (Gallons per Day)
a. Sanitary	300
b. Irrigation & lawn watering	
c. Non-contact cooling water	
d. Contact cooling water	
e. Process water	
f. Plant & equipment washdown	
g. ~~Boiler~~ Dust Control	15,000
h. Other uses Leachate	250,000
i. Total of USES (6a through 6h):	265,300

7. Identify all water losses and wasterwater discharges from your facility:

Water Losses & Discharges	Estimated average daily loss/discharge (Gallons per Day)
a. Municipal sewer	250,000
b. Watercourse, storm drain, ground	
c. Haulers	300
d. Evaporation	15,000
e. Contained in product	
f. Total of LOSSES & DISCHARGES: (7a through 7e must equal total at 6i)	265,300

8. List average water usage and average wastewater discharge for each activity listed in Sections B.1 and B.5. Attach additional sheets if needed.

Item No.	Activity	Type of Discharge Cont.	Batch	None	Avg Water Use (GPD)	Avg Discharge to Mun sewer (GPD)	Date When Activity First Commenced At This Facility
1	Sanitary - hauled out	[]	[]	X	300	0	unknown
2	Dust Control	[]	[]	X	15,000	0	unknown
3	Leachate removal	X	[]	[]	0	250,000	unknown
		[]	[]	[]			
		[]	[]	[]			
		[]	[]	[]			

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Company Name: Bridgeton Landfill, LLC.
Premise Address: 13570 St. Charles Rock Road
Account Number: 05115598-02

SECTION D - SEWER CONNECTION INFORMATION

1. Attach a scale drawing of your premise which shows:
   a. All buildings, structures, alleys, streets and other pertinent features.
   b. All sewers and drains, including all connections, inlets, manholes, vents and other access or control structures. Identify each sewer as sanitary, storm or combined and indicate its size.
   c. A sampling point for each connection to the public sewer.
   d. A sampling point for each discharge from a federally regulated categorical process.
   e. A sampling point for each discharge to a separate storm sewer or water course.

2. List each sampling point identified in 1.c, d and e above and each connection for which there is no sampling point. Assign a sequential reference number to each point, starting with No. 1. Attach additional sheets if needed.

Reference Number	Sewer Size (inches)	Description of sewer sampling point or connection (Vent, manhole, valve, tank or other appurtenance. Indicate size and location)	Total Daily Average Flow (GPD)
1	8	Leachate Lagoon discharge manhole	250,000
2			
3			
4			
5			

SECTION E - WASTEWATER INFORMATION

1. For each point listed in D.2 above, list the wastewater discharge corresponding to each water usage listed in Section C.6. Attach additional sheets if needed.

Type Wastewater	Discharge Quantity (GPD) for each sampling point or connection listed in D.2					Facility Total.
	1	2	3	4	5	(See Instructions)
a. Sanitary						
b. Irrigation & Lawn Watering						
c. Non-Contact Cooling Water						
d. Contact Cooling Water						
e. Process (From C.8)						
leachate removal	250,000					
f. Plant & Equipment Washdown						
g. Boiler Blowdown						
h. Other (_____)						
Regeneration Waste (C.5)						
Totals (Same as D.2)	250,000					

2. If any of the above points discharge to a watercourse or a separate storm sewer, complete the following:

NPDES Outfall Number	N/A				
NPDES Permit Number	N/A				

3. Do any of the above sampling points also convey stormwater from your premise ?

[] Yes [X] No	[] Yes [] No	[] Yes [] No	[] Yes [] No	[] Yes [] No	[] Yes [] No

4. Do you pretreat any of the wastes discharged through any of the above points?

[X] Yes [] No	[] Yes [] No	[] Yes [] No	[] Yes [] No	[] Yes [] No	[] Yes [] No

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Company Name: B[redacted]dgeton Landfill, LLC.
Premise Address: 13570 St. Charles Rock Road
Account Number: 05115596-02

SECTION E - WASTEWATER INFORMATION (Cont'd)

5. Describe the type of wastewater pretreatment you employ prior to each point for which you marked "Yes" in E.4:

Point No.	Pretreatment System Description
1	Aeration/Retention Lagoon

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6. Does your facility have:
a. A spill control plan? [X] Yes [] No
b. A waste minimization plan? [] Yes [X] No
c. A solvent management plan? [X] Yes [] No
d. A slug discharge control plan? [] Yes [X] No

7. If any wastewater analyses have been performed on the wastewater discharges from your facility attach copies of the most recent data. Be sure to specify the locations from which the samples were collected. Attach sketches, plans, drawings, etc. as necessary.

8. Priority Pollutant Information: Check one of the four boxes by each listed chemical to indicate whether it is: "Suspected Absent", "Known Absent", "Suspected Present", or "Known Present" ON YOUR PREMISE. Any chemical which is used in your manufacturing or service activity or is generated as a product or as a by-product should be marked "Known Present". Some pollutants are known by other names. Refer to the instruction booklet for those pollutants which have an asterisk (*).

SA = "Suspected Absent" KA = "Known Absent" SP = "Suspected Present" KP = "Known Present"

ITEM NO.	PRIORITY POLLUTANT	SA	KA	SP	KP
1.	asbestos (fibrous)	[]	[]	[]	[X]
2.	cyanide (total)	[]	[]	[X]	[]
3.	antimony (total)	[]	[]	[X]	[]
4.	arsenic (total)	[]	[]	[X]	[]
5.	beryllium (total)	[]	[]	[X]	[]
6.	cadmium (total)	[]	[]	[]	[X]
7.	chromium (total)	[]	[]	[]	[X]
8.	copper (total)	[]	[]	[]	[X]
9.	lead (total)	[]	[]	[]	[X]
10.	mercury (total)	[]	[]	[X]	[]
11.	nickel (total)	[]	[]	[]	[X]
12.	selenium (total)	[]	[]	[X]	[]
13.	silver (total)	[]	[]	[X]	[]
14.	thallium (total)	[]	[]	[X]	[]
15.	zinc (total)	[]	[]	[]	[X]
16.	acenaphthene	[X]	[]	[]	[]
17.	acenaphthylene	[X]	[]	[]	[]
18.	acrolein	[X]	[]	[]	[]
19.	acrylonitrile	[X]	[]	[]	[]
20.	aldrin	[X]	[]	[]	[]
21.	anthracene	[]	[]	[X]	[]
22.	benzene	[X]	[]	[]	[]
23.	benzidine	[X]	[]	[]	[]
24.	benzo (a) anthracene *	[X]	[]	[]	[]
25.	benzo (a) pyrene	[X]	[]	[]	[]
26.	benzo (b) fluoranthene	[X]	[]	[]	[]
27.	benzo (g,h,i) perylene *	[X]	[]	[]	[]
28.	benzo (k) fluoranthene *	[X]	[]	[]	[]
29.	alpha-BHC	[X]	[]	[]	[]
30.	beta-BHC	[X]	[]	[]	[]
31.	delta-BHC	[X]	[]	[]	[]
32.	gamma-BHC *	[X]	[]	[]	[]
33.	bis (2-chloroethyl) ether *	[X]	[]	[]	[]
34.	bis (2-chloroethoxy) methane *	[X]	[]	[]	[]
35.	bis (2-chloroisopropyl) ether *	[X]	[]	[]	[]
36.	Reserved				
37.	bis (2-ethylhexyl) phthalate	[X]	[]	[]	[]
38.	bromodichloromethane *	[]	[]	[]	[]
39.	bromoform *	[X]	[]	[]	[]
40.	bromomethane *	[X]	[]	[]	[]
41.	4-bromophenylphenyl ether	[X]	[]	[]	[]
42.	butylbenzyl phthalate	[X]	[]	[]	[]
43.	carbon tetrachloride *	[X]	[]	[]	[]
44.	chlordane	[X]	[]	[]	[]
45.	4-chloro-3-methylphenol *	[X]	[]	[]	[]
46.	chlorobenzene	[]	[]	[X]	[]
47.	chlorethane *	[]	[]	[X]	[]
48.	2-chloroethylvinyl ether	[X]	[]	[]	[]
49.	chloroform *	[X]	[]	[]	[]
50.	chloromethane *	[X]	[]	[]	[]
51.	2-chloronaphthalene	[X]	[]	[]	[]
52.	2-chlorophenol *	[X]	[]	[]	[]
53.	4-chlorophenylphenyl ether	[X]	[]	[]	[]
54.	chrysene *	[X]	[]	[]	[]
55.	4,4'-DDD *	[X]	[]	[]	[]
56.	4,4'-DDE *	[X]	[]	[]	[]
57.	4,4'-DDT *	[X]	[]	[]	[]
58.	dibenzo (a,h) anthracene *	[X]	[]	[]	[]
59.	dibromochloromethane *	[X]	[]	[]	[]
60.	1,2-dichlorobenzene *	[X]	[]	[]	[]
61.	1,3-dichlorobenzene *	[X]	[]	[]	[]
62.	1,4-dichlorobenzene *	[X]	[]	[]	[]
63.	3,3'-dichlorobenzidine	[X]	[]	[]	[]
64.	Reserved				
65.	1,1-dichloroethane *	[X]	[]	[]	[]
66.	1,2-dichloroethane *	[X]	[]	[]	[]
67.	1,1-dichloroethene *	[]	[]	[X]	[]
68.	trans-1,2-dichloroethene *	[]	[]	[]	[]
69.	2,4-dichlorophenol	[X]	[]	[]	[]
70.	1,2-dichloropropane *	[X]	[]	[]	[]
71.	(cis & trans) 1,3-dichloropropene *	[X]	[]	[]	[]
72.	dieldrin	[X]	[]	[]	[]
73.	diethylphthalate *	[X]	[]	[]	[]
74.	2,4-dimethylphenol *	[X]	[]	[]	[]
75.	dimethyl phthalate	[X]	[]	[]	[]
76.	di-n-butyl phthalate	[X]	[]	[]	[]

Continued on Page 6

Company Name: Bridgeton Landfill, LLC.
Premise Address: 13570 St. Charles Rock Road
Account Number: 0511559802

SECTION E - WASTEWATER INFORMATION (Cont'd)

Priority Pollutant Information (Cont'd)

SA = "Suspected Absent" KA = "Known Absent" SP = "Suspected Present" KP = "Known Present"

ITEM NO.	PRIORITY POLLUTANT	SA	KA	SP	KP
77.	di-n-octyl phthalate *	X			
78.	4,6-dinitro-2-methylphenol *	X			
79.	2,4-dinitrophenol	X			
80.	2,4-dinitrotoluene	X			
81.	2,6-dinitrotoluene	X			
82.	1,2-diphenylhydrazine *	X			
83.	endosulfan I *	X			
84.	endosulfan II *	X			
85.	endosulfan sulfate	X			
86.	endrin	X			
87.	endrin aldehyde	X			
88.	ethylbenzene			X	
89.	fluoranthene	X			
90.	fluorene *	X			
91.	heptachlor	X			
92.	heptachlor epoxide	X			
93.	hexachlorobenzene *	X			
94.	hexachlorobutadiene	X			
95.	hexachlorocyclopentadiene *	X			
96.	hexachloroethane *	X			
97.	indeno (1,2,3-cd) pyrene *	X			
98.	isophorone *	X			
99.	methylene chloride *			X	
100.	naphthalene	X			
101.	nitrobenzene	X			
102.	2-nitrophenol	X			
103.	4-nitrophenol *	X			
104.	N-nitrosodimethylamine *	X			
105.	N-nitrosodi-n-propylamine *	X			
106.	N-nitrosodiphenylamine	X			
107.	PCB-1016 *	X			
108.	PCB-1221 *	X			
109.	PCB-1232 *	X			
110.	PCB-1242 *	X			
111.	PCB-1248 *			X	
112.	PCB-1254 *	X			
113.	PCB-1260 *			X	
114.	pentachlorophenol	X			
115.	phenanthrene	X			
116.	phenol			X	
117.	pyrene	X			
118.	2,3,7,8-tetrachlorodibenzo-p-dioxin *	X			
119.	1,1,2,2-tetrachloroethane *	X			
120.	tetrachloroethene *	X			
121.	toluene *			X	
122.	toxaphene	X			
123.	1,2,4-trichlorobenzene	X			
124.	1,1,1-trichloroethane *	X			
125.	1,1,2-trichloroethane *	X			
126.	trichloroethene *			X	
127.	Reserved				
128.	2,4,6-trichlorophenol	X			
129.	vinyl chloride *			X	

9. For priority pollutants in E.8 which are indicated "Known Present," list and provide the following data for each. Attach additional sheets if needed.

ITEM NO.	PRIORITY POLLUTANT	HOW USED	ANNUAL USAGE (LBS)	LOSS TO SEWER (LBS/YEAR)
1	Asbestos	By-product of waste	0	not analyzed
6	Cadmium	↕	0	4
7	Chromium	↕	0	18
8	Copper	↕	0	20
9	Lead	↕	0	17
11	Nickel	↕	0	33
15	Zinc	By-product of waste	0	47

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Company Name: B[redacted]geton Land Fill, LLC.
Premise Address: 13570 St. Charles Rock Road
Account Number: 05115398-02

SECTION F - NON-SEWERED WASTES

1. Do you generate any liquid wastes or sludges which are not disposed in the sewer system? [X] Yes [] No
If "Yes" complete items 2 and 3 below. Note: Be sure to include wastewaters listed in Section C.7.c.
If "No," skip remainder of this section.

2. Information on non-sewered waste:

Type of Waste	Estimated Quantity Disposed/yr	Units	Store on-site	Dispose on-site	~~Dispose~~ Recycle off-site
[] Acids and/or Alkalies			[]	[]	[]
[X] Equip. Oils and/or Grease	3,000	gallons	[]	[]	[X]
[] Infectious Waste			[]	[]	[]
[] Inks/Dyes			[]	[]	[]
[] Kitchen/Food Service Grease			[]	[]	[]
[] Organic Compounds			[]	[]	[]
[] Paints or Paint Sludges			[]	[]	[]
[] Pesticides			[]	[]	[]
[] Pretreatment Sludges			[]	[]	[]
[] Radioactive Waste			[]	[]	[]
[X] Solvents/Thinners	40	gallons	[]	[]	[X]
[] Other _____			[]	[]	[]
			[]	[]	[]
			[]	[]	[]

3. List your USEPA and/or MDNR Hazardous Waste generator numbers:

USEPA Mo-D980741805 MDNR 000925

SECTION G - INDUSTRIAL WASTE SURCHARGE INFORMATION

1. The following analytical information is required for each sampling point or each connection to the public sewer (see D.1.c), only if your water usage exceeds 80 Ccf per month. Representative samples of the wastewater in each sewer must be collected and analyzed for the listed parameters. Concentrations are to be reported in mg/l.

Sewer Number (Refer to Section D.2)
(If more than 5, attach additional sheets)

Daily Average Concentration For Each Sampling Point or Connection

Parameter (mg/l)	1	2	3	4	5
Total Solids	Not analyzed				
Total Suspended Solids	54 mg/L				
Biochemical Oxygen Demand$_5$	134 mg/L				
Chemical Oxygen Demand	637 mg/L				
Flow (gpd)	250,000				
Date Sampled	2/16-2/17/00				
Time Sampled	1210, 1725, 0840, 1105				
Type of Sample	composite				

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MSD 023640

Company Name: Bridgeton Landfill, LLC
Premise Address: 13570 St. Charles Rock Road
Account Number: 0511 5598-02

SECTION G - INDUSTRIAL WASTE (Cont'd)

2. Sample handling information: Organization Name and Address

a. Samples collected by: Hurst & Associates, Inc. 5988 Mid Rivers Mall Drive, St. Charles, Mo

b. Samples analyzed by: Pace Analytical Services, INC. 900 Gemini Ave, Houston, Tx

SECTION H - CERTIFICATION AND SIGNATURE

1. The following individual may be contacted regarding the information contained in this questionnaire:

Name and title of contact person: Matt Kingsley - Site Manager

Tel No. (314) 739-1919

2. "I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name and title of signing official: Matt Kingsley General Manager

Tel No. (314) 739-1919

Signature Matt Kingsley Date 5/31/2000

List attachments included with this questionnaire:
Figure 1. Bridgeton Landfill Leachate Outfall 005 Discharge Point
Analytical Data for Outfall 005 from Pace Analytical

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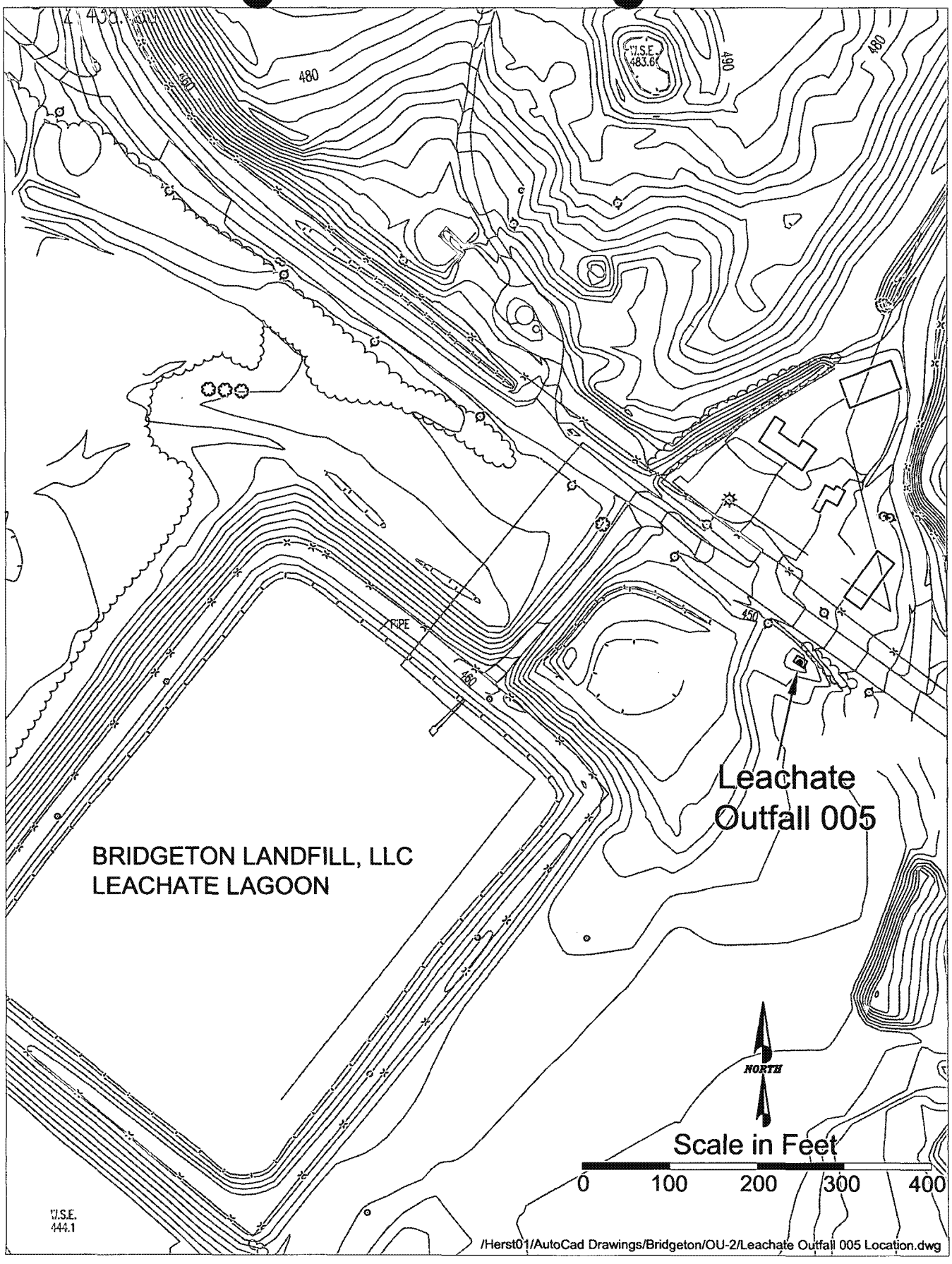
MSD 023641



Herst & Associates, Inc.

Figure 1. Bridgeton Landfill Leachate Outfall 005 Discharge Point

Pace Analytical™

Pace Analytical Services, Inc.
900 Gemini Avenue
Houston, TX 77058
Phone: 281.488.1810
Fax: 281.488.4661

March 06, 2000

Mr. Ward Herst
Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

RE: Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Dear Mr. Herst:

Enclosed are the results of analyses for sample(s)received by the laboratory on February 18, 2000. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Paul Dawson
Project Manager

Enclosures

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REPORT OF LABORATORY ANALYSIS

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Pace Analytical™

Pace Analytical Services, Inc.
900 Gemini Avenue
Houston, TX 77058
Phone: 281.488.1810
Fax: 281.488.4661

Report Narrative

Narrative comment: The laboratory has reviewed the GC/MS data for 2-Hexanone and 4-Methyl-2-pentanone concentrations below the PRL. If 2-Hexanone or 4-Methyl-2-pentatnone concentrations between 2 ug/l and 10 ug/l are observed, the result is reported with a J-flag qualifier. An "ND" reported denotes that the target was not detected above 2 ug/l.

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900 Gemini Avenue
Houston, TX 77058
Phone: 281.488.1810
Fax: 281.488.4661

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

Solid results are reported on a wet weight basis

Pace Sample No: 851339408 Date Collected: 02/17/00 Matrix: Water
Client Sample ID: LEACHATE OUTFALL 005 Date Received: 02/18/00

Parameters	Results	Units	PRL	App. DF	Analyzed	Analyst	CAS#	Footnotes
Metals								
EPA 200.7 Metals,Routine Block	Method: EPA 200.7				Prep Method: Metals prep.			
Arsenic	ND	ug/l	50	1.00	02/26/00	VSAS	7440-38-2	
Cadmium	ND	ug/l	5	1.00	02/26/00	VSAS	7440-43-9	
Chromium	24.4	ug/l	5	1.00	02/26/00	VSAS	7440-47-3	
Copper	43.5	ug/l	5	1.00	02/26/00	VSAS	7440-50-8	
Iron	5030	ug/l	30	1.00	02/26/00	VSAS	7439-89-6	
Lead	ND	ug/l	50	1.00	02/26/00	VSAS	7439-92-1	
Nickel	39.8	ug/l	10	1.00	02/26/00	VSAS	7440-02-0	
Zinc	69.6	ug/l	20	1.00	02/26/00	VSAS	7440-66-6	
Mercury, Water, SW 7470	Method: EPA 7470				Prep Method: EPA 7470			
Mercury	ND	ug/l	0.2	1.00	02/22/00	BJAC	7439-97-6	
Wet Chemistry								
pH of Water Samples	Method: EPA 150.1				Prep Method: EPA 150.1			
pH	7.7		0	1.00	02/18/00	JROB		
Total Suspended Solids	Method: EPA 160.2				Prep Method: EPA 160.2			
Total Suspended Solids	54	mg/l	4	1.00	02/24/00	JROB		
Ammonia, Distilled	Method: EPA 350.1				Prep Method: EPA 350.1			
Nitrogen, Ammonia	203	mg/l	12.5	125	03/03/00	HFEB	7727-37-9	
Chemical Oxygen Demand, 410.4	Method: EPA 410.4				Prep Method: EPA 410.4			
Chemical Oxygen Demand	637	mg/l	5	1.00	02/26/00	KMUL		

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Pace Analytical Services, Inc.
900 Gemini Avenue
Houston, TX 77058
Phone: 281.488.1810
Fax: 281.488.4661

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Pace Sample No: 851339408 Date Collected: 02/17/00 Matrix: Water
Client Sample ID: LEACHATE OUTFALL 005 Date Received: 02/18/00

Parameters	Results	Units	PRL	App. DF	Analyzed	Analyst	CAS#	Footnotes
Biochemical Oxygen Demand, 5 d	Method: EPA 405.1				Prep Method: EPA 405.1			
BOD, 5 day	134	mg/l	2	1.00	02/18/00	JROB		
Organics Prep								
Total Recoverable Oil & Grease	Method: EPA 413.1				Prep Method: EPA 3510			
Oil and Grease	ND	mg/l	5	1.00	02/24/00	FOSE		

Comments : Total metals container was received at a pH of 7. Adjusted pH and proceeded with analysis per client request.

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Pace Analytical Services, Inc.
900 Gemini Avenue
Houston, TX 77058

Phone: 281.488.1810
Fax: 281.488.4661

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

PARAMETER FOOTNOTES

ND	Not Detected
NC	Not Calculable
PRL	Pace Reporting Limit
App. DF	Applied Dilution Factor

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Pace Analytical Services, Inc.
900 Gemini Avenue
Houston, TX 77058
Phone: 281.488.1810
Fax: 281.488.4661

QUALITY CONTROL DATA

DATE: 03/06/00

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 34837
Analysis Method: EPA 200.7
Associated Pace Samples: 851339408

QC Batch Method: Metals prep.
Analysis Description: EPA 200.7 Metals,Routine Block

METHOD BLANK: 851380196
Associated Pace Samples:
851339408

Parameter	Units	Method Blank Result	PRL	Footnotes
Arsenic	ug/l	ND	50	
Cadmium	ug/l	ND	5	
Chromium	ug/l	ND	5	
Copper	ug/l	ND	5	
Iron	ug/l	ND	30	
Lead	ug/l	ND	50	
Nickel	ug/l	ND	10	
Zinc	ug/l	ND	20	

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MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 851380212 851380220

Parameter	Units	851378893	Spike Conc.	Matrix Spike Result	Spike % Rec	Matrix Sp. Dup. Result	Spike Dup % Rec	RPD	Footnotes
Arsenic	ug/l	4.411	250	283.6	112	291.0	115	3	1
Cadmium	ug/l	1.808	250	279.5	111	278.9	111	0	1
Chromium	ug/l	2.528	250	278.2	110	282.0	112	1	2
Copper	ug/l	7.202	250	284.0	111	281.3	110	1	2
Iron	ug/l	286.3	250	577.1	116	582.5	118	2	
Lead	ug/l	1.454	250	270.4	108	270.4	108	0	
Nickel	ug/l	4.625	250	281.6	111	278.8	110	1	2
Zinc	ug/l	107.3	250	391.1	114	387.7	112	1	1

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Pace Analytical Services, Inc.
900 Gemini Avenue
Houston, TX 77058
Phone: 281.488.1810
Fax: 281.488.4661

QUALITY CONTROL DATA

DATE: 03/06/00

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

LABORATORY CONTROL SAMPLE: 851380204

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
Arsenic	ug/l	250	266.9	107	
Cadmium	ug/l	250	269.1	108	
Chromium	ug/l	250	271.1	108	
Copper	ug/l	250	267.8	107	
Iron	ug/l	250	854.3	342	
Lead	ug/l	250	249.0	99.6	
Nickel	ug/l	250	267.6	107	
Zinc	ug/l	250	271.1	108	

LABORATORY CONTROL SAMPLE: 851390807

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
Arsenic	ug/l	250	269.5	108	
Cadmium	ug/l	250	270.6	108	
Chromium	ug/l	250	270.9	108	
Copper	ug/l	250	263.2	105	
Iron	ug/l	250	266.1	106	
Lead	ug/l	250	276.4	111	
Nickel	ug/l	250	274.9	110	
Zinc	ug/l	250	272.1	109	

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Pace Analytical Services, Inc.
900 Gemini Avenue
Houston, TX 77058
Phone: 281.488.1810
Fax: 281.488.4661

QUALITY CONTROL DATA

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 34874
Analysis Method: EPA 7470
Associated Pace Samples: 851339408

QC Batch Method: EPA 7470
Analysis Description: Mercury, Water, SW 7470

METHOD BLANK: 851381129
Associated Pace Samples:
851339408

Parameter	Units	Method Blank Result	PRL	Footnotes
Mercury	ug/l	ND	0.2	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 851381137 851381145

Parameter	Units	851339838	Spike Conc.	Matrix Spike Result	Spike % Rec	Matrix Sp. Dup. Result	Spike Dup % Rec	RPD	Footnotes
Mercury	ug/l	0.1000	2.000	2.000	94.8	2.100	100	5	

LABORATORY CONTROL SAMPLE: 851381152

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
Mercury	ug/l	2.000	1.700	82.7	

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QUALITY CONTROL DATA

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 34979
Analysis Method: EPA 405.1
Associated Pace Samples: 851339408

QC Batch Method: EPA 405.1
Analysis Description: Biochemical Oxygen Demand, 5 d

METHOD BLANK: 851385682
Associated Pace Samples:
851339408

Parameter	Units	Method Blank Result	PRL	Footnotes
BOD, 5 day	mg/l	ND	2	

LABORATORY CONTROL SAMPLE: 851385690

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
BOD, 5 day	mg/l	198	179.0	90.3	

SAMPLE DUPLICATE: 851385708

Parameter	Units	851376947	Dup. Result	RPD	Footnotes
BOD, 5 day	mg/l	4.000	4.000	0	

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QUALITY CONTROL DATA

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 35007
Analysis Method: EPA 413.1
Associated Pace Samples: 851339408

QC Batch Method: EPA 3510
Analysis Description: Total Recoverable Oil & Grease

METHOD BLANK: 851387217
Associated Pace Samples:
851339408

Parameter	Units	Method Blank Result	PRL	Footnotes
Oil and Grease	mg/l	ND	5	

LABORATORY CONTROL SAMPLE & LCSD: 851387225 851387233

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	LCSD Result	Spike Dup % Rec	RPD	Footnotes
Oil and Grease	mg/l	50	46.40	92.8	46.10	92.2	1	

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QUALITY CONTROL DATA

DATE: 03/06/00

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 35026
Analysis Method: EPA 150.1
Associated Pace Samples: 851339408

QC Batch Method: EPA 150.1
Analysis Description: pH of Water Samples

LABORATORY CONTROL SAMPLE: 851387894

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
pH		8.000	8.000	100	

SAMPLE DUPLICATE: 851387902

Parameter	Units	851346247	Dup. Result	RPD	Footnotes
pH		6.200	6.100	2	

SAMPLE DUPLICATE: 851387910

Parameter	Units	851383216	Dup. Result	RPD	Footnotes
pH		7.000	7.000	0	

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QUALITY CONTROL DATA

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 35043
Analysis Method: EPA 160.2
Associated Pace Samples: 851339408

QC Batch Method: EPA 160.2
Analysis Description: Total Suspended Solids

METHOD BLANK: 851388249
Associated Pace Samples:
851339408

Parameter	Units	Method Blank Result	PRL	Footnotes
Total Suspended Solids	mg/l	ND	4	

SAMPLE DUPLICATE: 851388256

Parameter	Units	851386011	Dup. Result	RPD	Footnotes
Total Suspended Solids	mg/l	7.500	6.000	22	3

SAMPLE DUPLICATE: 851389056

Parameter	Units	851382556	Dup. Result	RPD	Footnotes
Total Suspended Solids	mg/l	4030	4050	0	

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QUALITY CONTROL DATA

DATE: 03/06/00

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 35101
Analysis Method: EPA 410.4
Associated Pace Samples: 851339408

QC Batch Method: EPA 410.4
Analysis Description: Chemical Oxygen Demand, 410.4

METHOD BLANK: 851390922
Associated Pace Samples:
851339408

Parameter	Units	Method Blank Result	PRL	Footnotes
Chemical Oxygen Demand	mg/l	ND	5	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 851390930 851390948

Parameter	Units	851346247	Spike Conc.	Matrix Spike Result	Spike % Rec	Matrix Sp. Dup. Result	Spike Dup % Rec	RPD	Footnotes
Chemical Oxygen Demand	mg/l	20.00	75	92.00	96.0	82.00	82.7	15	

LABORATORY CONTROL SAMPLE: 851390955

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
Chemical Oxygen Demand	mg/l	75	72.00	96.0	

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QUALITY CONTROL DATA

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

QC Batch ID: 35179
Analysis Method: EPA 350.1
Associated Pace Samples: 851339408

QC Batch Method: EPA 350.1
Analysis Description: Ammonia, Distilled

METHOD BLANK: 851394288
Associated Pace Samples:
851339408

Parameter	Units	Method Blank Result	PRL	Footnotes
Nitrogen, Ammonia	mg/l	ND	0.1	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 851394296 851394304

Parameter	Units	851384149	Spike Conc.	Matrix Spike Result	Spike % Rec	Matrix Sp. Dup. Result	Spike Dup % Rec	RPD	Footnotes
Nitrogen, Ammonia	mg/l	0.1430	1.000	0.9970	85.4	1.006	86.3	1	

LABORATORY CONTROL SAMPLE: 851394312

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
Nitrogen, Ammonia	mg/l	1.000	0.9830	98.3	

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LABORATORY CONTROL SAMPLE: 851397984

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
Nitrogen, Ammonia	mg/l	1.000	1.018	102	

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Fax: 281.488.4661

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

QUALITY CONTROL DATA PARAMETER FOOTNOTES

Consistent with EPA guidelines unrounded concentrations are displayed and have been used to calculate % Rec and RPD values.

ND	Not Detected
NC	Not Calculable
PRL	Pace Reporting Limit
RPD	Relative Percent Difference
[1]	Matrix spike and/or spike duplicate recovery is outside of laboratory control limits, however data is accepted based on LCS recovery.
[2]	Matrix spike or spike duplicate recovery is outside of laboratory control limits, however data is accepted based on LCS and the other spike recovery.
[3]	The analyte concentration for the sample and/or duplicate is less than or equal to 10 times the PRL, therefore the RPD is statistically invalid.

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QUALITY CONTROL DATA
CROSS REFERENCE TABLE

Herst and Associates
5988 Mid Rivers Mall Drive
Suite 213
St. Charles, MO 63304

Pace Project Number: 8514307
Client Project ID: A/W Bridgeton LCH 2/00

Attn: Mr. Ward Herst
Phone: 314-939-9111

Pace Sample No Identifier	Client Sample Identifier	QC Batch Method	QC Batch Identifier	Analytical Method	Analytical Batch Identifier
851339408	LEACHATE OUTFALL 005	Metals prep.	34837	EPA 200.7	34991
851339408	LEACHATE OUTFALL 005	EPA 7470	34874		
851339408	LEACHATE OUTFALL 005	EPA 405.1	34979		
851339408	LEACHATE OUTFALL 005	EPA 3510	35007	EPA 413.1	35008
851339408	LEACHATE OUTFALL 005	EPA 150.1	35026		
851339408	LEACHATE OUTFALL 005	EPA 160.2	35043		
851339408	LEACHATE OUTFALL 005	EPA 410.4	35101		
851339408	LEACHATE OUTFALL 005	EPA 350.1	35179		

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CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

492241

Page: 1 of 1

Required Client Information: **Section A**

Company: Herst and Associates
Address: 5988 Mid Rivers Mall Dr
Suite 136
St. Charles MO 63304
Phone: 636-939-9111 Fax: 636-939-9757

Required Client Information: **Section B**

Report To: Ward Herst
Invoice To: Ward Herst
P.O.
Project Name: Bridgeton LF - Leachate
Project Number:

Client Information (Check quote/contract):
Requested Due Date: *TAT:

* Under 14 day turnaround subject to laboratory and contractual obligations and may result in a Rush Turnaround Surcharge.

Turn Around Time (TAT) in calender days.

To Be Completed by Pace Analytical and Client **Section C**

Quote Reference:
Project Manager:
Project #:
Profile #:

Section D **Required** Client Information:

SAMPLE ID

One character per box.
(A–Z, 0–9 / .–)
Sample IDs MUST BE UNIQUE

Valid Matrix Codes

MATRIX	CODE
WATER	WT
SOIL	SL
OIL	OL
WIPE	WP
AIR	AR
TISSUE	TS
OTHER	OT

Requested Analysis: pH, TSS, BOD, Oil + Grease, Ammonia, COD, Total Metals

ITEM #	SAMPLE ID	MATRIX CODE	DATE COLLECTED (mm / dd / yy)	TIME COLLECTED (mm : hh a/p)	# Containers	Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	pH	TSS	BOD	Oil + Grease	Ammonia	COD	Total Metals	Remarks / Lab ID
1	LEACHATE OUTFALL 005	WT	2/16/00 2/17/00	1210, 1725 0840 1105	5	1						X							851339408 Composite sample
2						1	1						X	X					
3							1								X				
4								1								X			
5																			
6																			
7																			
8																			
9																			
10																			
11																			
12																			

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Sample Condition		Sample Notes	Item No.	Relinquished By / Company	Date	Time	Accepted By / Company	Date	Time
Temp in °C:	0.3			Melissa McGuire / Herst	2/17	1600	Fed Ex 8186 8400 2646	2/17	1600
Received on ICE:	(Y) / N			Fed-Ex 8186 8400 2646	2/18/00	0925	Tony Gadwin / PACE	2/18/00	0925
Sealed Cooler:	(Y) / N								
Samples Intact:	(Y) / N								

Additional Comments:

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER: Melissa McGuire

SIGNATURE of SAMPLER: Melissa McGuire

DATE Signed: (MM / DD / YY) 2/17/00

SEE REVERSE SIDE FOR INSTRUCTIONS

Pace Analytical Services, Inc. Form COC01.XLS 08/98

ORIGINAL

MSD 023659