Center for Health, Environment & Justice
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2015 SEP -8 AM 11:38

September 1, 2015

USEPA Headquarters
c/o Regnia McCarthy
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
Washington, DC 20460

Dear Administrator McCarthy,

I am writing again to request a meeting with you and the community group Just Moms STL from St. Louis, MO. Just Moms STL and I have been formally requesting a meeting with you for about a year. The week of October 26th works best for the organizational leaders Just Moms STL.

The moms even traveled to Washington at their own expense to see you this past spring with no response, other than referring them to your regional staff who have been equally unresponsive. I don't understand your reluctance to meet with these innocent families from St. Louis. Senators Blunt and McCaskill, as well as Representatives Clay and Wagner all support and have requested that you meet with their constituency, but still, you have refused. The Just Moms STL sold cupcakes and T-Shirts to raise the funds they needed to travel to D.C. They are doing that again to pay their way to D.C. to meet with you.

I am imploring you to take the time to meet with us to discuss the on-going and increasingly dangerous situation at the Westlake/Bridgeton Superfund site. Just Moms STL have had formal conversations with Mathy Stanislaus, Barry Breen and Mark Hague. The result of those meetings was that they disagreed with the residents. It is for that reason that the community is asking for you to listen to their concerns and explore if you, Stanislaus, Breen and Hague's supervisor agree with their reasoning and conclusions.

Today the community called CHEJ in a panic because of a recent letter they had received from Missouri Department of Natural Resources (DNR). This letter, dated August 10, 2015, to Republic Services, the owner of the landfills expressed great concern about the smoldering fire moving into the north quarry and closer to the high-level radioactive wastes buried at the West Lake Landfill Superfund site in St. Louis County, Missouri.

The DNR letter requires Republic Services to remove reinforced concrete pipes (RCPs) in the North Quarry that could be allowing oxygen into the landfill and increasing the risk of an independent smoldering fire. Republic Services was required to remove RCPs in the South Quarry during the summer of 2013 and offered voluntary relocation on a temporary basis during the remediation period to residents within one mile of the site due to an anticipated increase in odors.

This is ridiculous. People live there and can't be temporarily relocated every time Republic fails to properly implement the required safety measures at the site. Furthermore, EPA's role in allowing the polluter to continue to undertake inadequate measures and not properly oversee their operations places EPA at fault as well.

Residents are asking for relocation of innocent families beginning with the original one mile radius used by Republic in 2013 and will likely be used again when they reconstruct the second batch of pipes in the North Quarry. If EPA cannot protect the public from the toxic releases coming from the landfills, then you must move the people permanently not temporarily.

Please take the time to meet with the community so they can explain directly to you why they are asking for relocation and how living in terror because of the unknowns is destroying their lives.

Sincerely,

Lois Marie Gibbs
Center for Health, Environment & Justice

Attached is the summary of details that the MO Department of Natural Resources is requesting of Republic.

The DNR letter to Republic Services includes the following important details:

- The 'Heat Extraction Pilot Study' cooling line does not extend across the entire neck area, from quarry wall to quarry wall, which continues to allow an open pathway for potential progression of the subsurface smoldering fire (pg. 1-2).
- Data reported by Bridgeton Landfill continues to show an area of concern in the Neck which seemingly is beyond the zone of influence of the Heat Extraction Pilot Study (pg.2).
- There are uncertainties regarding the installation of an isolation barrier near the West Lake Landfill Area 1 (pg. 6).
- DNR states there is no plan currently available or approved of to deter the smoldering fire from moving into the North Quarry (pg. 6).
- The North Quarry contains unidentified materials that were accepted previous to landfill regulations. (pg. 6).
- DNR requires Republic Services to have a corrective measure using inert gas injection or other available technology for "hot spot" treatment in the North Quarry to contain any independent fires that might be generated (pg. 6).
- DNR requires Republic Services to complete connection of the previously drilled North Quarry gas extraction wells…to the gas collection and control system (pg. 6).
- Reinforced concrete pipes (RCPs) in the south quarry allowed intrusion of oxygen and emission of landfill gases to ambient air thereby creating substantial odors and a public nuisance. RCPs in the North Quarry may be contributing to localized oxygen intrusion as these North Quarry RCPs have not been properly abandoned. Republic Services must prepare a work plan and schedule for the abandonment of the RCPs in the North Quarry (pg. 6-7).
- DNR is concerned a smoldering fire is moving into the North Quarry because (pg. 7):
    - Recent submitted reports identify seven areas of the North Quarry where methane emissions were between 700-1,500 parts per million (ppm),
    - Department staff observed leachate outbreaks along the north slope of the North Quarry in three areas in June 2015, and
    - Department staff recorded visual observations that show the beginning of movement of waste materials from the "high" North Quarry to the "lower" neck area.
- DNR requires that the cap must be enhanced to minimize oxygen intrusion into the underlying waste mass that may allow for increased risk of a new fire, capture of landfill gases that would otherwise be released as fugitive emissions including odors, prevention of leachate outbreaks that could contaminate ground and surface waters, and monitoring for uneven settlement in the waste mass requiring fill (pg. 7).
- DNR requires that Republic Services place survey pins in the North Quarry and along the North Quarry's slopes to monitor for any rapid waste reduction that could indicate the presence and/or movement of a subsurface smoldering fire in the North Quarry or the need for additional fill material for stabilization (pg. 7).
- Enhancements of the North Quarry must be complete no later than December 1, 2015 (pg. 8).
- With the reduction in available methane and hydrogen for combusting landfill gases, Republic Services will need to ensure Bridgeton Landfill complies with the requirements

of the Clean Air Act, Missouri Clean Air Law, and Missouri Solid Waste Management Law and implementing regulations with regards to utilization of natural gas as a supplement fuel (pg. 8).

The letter sent by DNR to Republic Services says, "Given the uncertainties regarding installation of an isolation barrier near the West Lake Landfill Area 1…the SWMP is requiring submittal of work plans and schedules for supplementary corrective measures…for review and approval by SWMP to ***ensure Bridgeton Landfill has immediately, implementable measures at hand***. With installation of the expanded heat extraction pilot study which has yet to be proven, Bridgeton Landfill has no additional measures approved and immediately, implementable."

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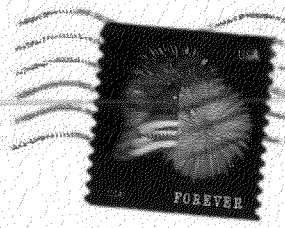

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