

ENGINEERING MANAGEMENT SUPPORT INC.

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October 11, 2016

VIA: Electronic Mail

U.S. Environmental Protection Agency
Region VII SUPR/MOKS
11201 Renner Boulevard
Lenexa, KS 66219

ATTENTION: Mr. Tom Mahler

**SUBJECT: Monthly Status Report – September 2016
Unilateral Administrative Order for Removal Action
West Lake Landfill Operable Unit 1, Bridgeton, Missouri**

Dear Mr. Mahler,

On behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., and Rock Road Industries, Inc., Engineering Management Support Inc. (EMSI) submits the attached status report for the month of September 2016 as required by paragraph 41 of the Unilateral Administrative Order for Removal Action EPA Docket No. CERCLA-07-2016-0002. If you have any questions or desire additional information related to this status report or any other aspect of the project, please do not hesitate to contact me.

Sincerely,
ENGINEERING MANAGEMENT SUPPORT, Inc.



Paul V. Rosasco, P.E.

Distribution:

Lynn Juett – EPA Region 7
Ryan Seabaugh – Missouri Dept. of Natural Resources
Victoria Warren – Republic Services, Inc.
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Bill Beck – Lathrop & Gage
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Stephanie Feingold – Morgan Lewis
Dale Guariglia – Bryan Cave HRO
Steven Miller - U. S. Department of Energy
Philip Dupre – U.S. Department of Justice
Dan Feezor – Feezor Engineering
Mike Bollenbacher – Auxier & Associates

Monthly Status Report – September 2016
Unilateral Administrative Order for Removal Action
Surface Fire Prevention and Incident Management Plan
West Lake Landfill Operable Unit 1
Bridgeton, Missouri

This status report has been prepared by Engineering Management Support Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC (formerly known as Laidlaw Waste Systems [Bridgeton] Inc.), and Rock Road Industries, Inc., for the Removal Action at Operable Unit - 1 (OU-1) of the West Lake Landfill, as required by paragraph 41 of the Unilateral Administrative Order, EPA Docket No. CERCLA-07-2016-0002 (UAO).

1. Work Performed During September 2016

Project Planning

Respondents received EPA's September 9, 2016 letter containing additional comments on the July 15, 2016 stormwater monitoring plan. Respondents submitted a request for a meeting to discuss these comments on September 19, 2016. EPA replied on September 22, 2016 and agreed to extend the deadline at least until such a meeting occurred.

Fieldwork – Non-Combustible Cover Construction

Respondents collected stormwater samples, as required by EPA's July 5, 2016 letter. Inspection of potential stormwater outflow points was performed on September 9 and 16, 2016. Photographs of the condition of the various potential outfall points were taken on these dates and are included in the attached Memorandum, "NCC Stormwater Sampling Update For September 2016," prepared by Feezor Engineering, Inc. Stormwater samples were collected from monitoring locations NCC-001, NCC-002 and NCC-003 on September 9, 2016. An additional sample was obtained uphill from NCC-003 (identified as NCC-003A) on September 16, 2016. Feezor Engineering, Inc. also inspected the east side of Area 1 and the north-northwest slopes of Area 2 on September 9 and 16, 2016. These efforts required several hours to complete each time and did not indicate any flow in either of these areas. Photographs of these areas are also included in the attached memorandum. The daily precipitation records for September 2016 are also included in this memorandum.

A site walk with EPA and MDNR was conducted on September 14, 2016 to inspect the various locations or possible locations of stormwater discharge from Area 1 and 2 and to discuss EPA's additional comments on the stormwater monitoring plan as provided in EPA's September 9, 2016 letter.

2. Analytical Data Received During This Reporting Period

The following analytical data were received during this period:

- Stormwater samples – TekLab report 16070920 and Eberline report 1607046.

Due to the size of the files for these reports, they are being transmitted separately.

3. Work Scheduled to Be Performed During October 2016

The following activity is expected to be performed during October 2016:

- Validation of the laboratory results for the stormwater samples; and
- Revision of the stormwater monitoring plan to address the additional comments provided by EPA in its September 9, 2016 letter.

4. Problems Encountered

Due to the presence of steep slopes, two small areas within Area 2 containing thorium-230 at levels above the criteria used to define the required extent of the non-combustible cover could not be covered with roadbase material. This condition was previously identified to EPA. Options for addressing these two areas were discussed with EPA on July 28, 2016 and again on September 14, 2016 and additional evaluations of potential options are currently being performed.

The UAO requires collection of vegetation samples as a basis for a determination that the remaining vegetation does not pose a threat of release of radionuclides. The results of the March 2009 vegetation sampling were provided to EPA as a means of addressing this issue. A discussion of the potential scope of additional vegetation sampling was held with EPA on July 28, 2016. EPA is still evaluating the specific types and numbers of vegetation samples it will require.

Laboratory Analytical Reports

*Due to the size of the files for these reports
they are being transmitted separately*