



**Missouri Department of Health and Senior Services**

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**Gail Vasterling**  
Acting Director



**Jeremiah W. (Jay) Nixon**  
Governor

DATE: May 10, 2013

TO: Chris Nagel, Director  
Solid Waste Management Program  
Missouri Department of Natural Resources

FROM: Jonathan Garoutte, Chief   
Bureau of Environmental Epidemiology  
Missouri Department of Health and Senior Services

SUBJECT: Review of Remedy Evaluation for Abandonment of Reinforced Concrete Pipes (RCPs).

The Missouri Department of Health and Senior Services (DHSS) has reviewed the Remedy Evaluation for Abandonment of Reinforced Concrete Pipes for Bridgeton Sanitary Landfill prepared by the Missouri Department of Natural Resources (DNR). Based on the options outlined and impacts presented by DNR, we concur that option 6 is the best option for protection of public health. Option 6 minimizes the potential for ongoing future releases by taking care of the RCPs now and not taking the risk that they will resurface later and need additional maintenance that would again release more landfill gasses. It also minimizes the potential for large events, such as a slope failure, that could release more significant amounts of landfill gases. Also, we have not seen chemical concentrations of public health concern for short term exposures during the significant well drilling work so far, and our understanding is that this RCP work may produce landfill gas emissions within a comparable range. Lastly, based on conversations with you and other DNR staff, option 6 may maximize the chance for the interim cap to actually bring the subsurface smoldering event to an end. So, the added time it will take for option 6 versus the other options seems outweighed by the benefits of reducing risk of future emissions and ongoing public exposure potential. For these reasons, again, I believe we concur with the choice of option 6.

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