

US EPA ARCHIVE DOCUMENT



LAMBERT-ST. LOUIS
INTERNATIONAL AIRPORT®

Rhonda Hamm-Niebruegge
Director



Francis G. Slay
Mayor
City of St. Louis

August 11, 2014

Karl Brooks
Regional Administrator
U.S. Environmental Protection Agency, Region 7
11201 Renner Blvd.
Lenexa, KS 66219

Re: Bridgeton/West Lake Landfill

Dear Karl:

On behalf of the City of St. Louis and Lambert-St. Louis International Airport, we thank you for the presentation that your agency and the U.S. Army Corps of Engineers made on the various alternatives being considered for the construction of an isolation barrier at the West Lake Landfill. Clearly, this an enormously complex construction project that must also deal with very complex mitigation issues at West Lake Landfill. While we need a lot more information, the technical material you presented was a very good start.

We both have a job to do. It is the EPA's job to make sure that the landfill does not pose a hazard to the public health or safety or to the environment. It is the EPA's responsibility to ensure that whatever solution you approve does not pose a bird strike hazard to aircraft for any of the 13 million passengers who fly in and out of Lambert every year. As we have communicated and discussed with your agency over the past few years, we will work with the EPA to address these issues. But, we will not consent to any option, nor would the Federal Aviation Administration concur with any recommended option, until we know that the traveling public, who put their safety in our hands, are not being put at risk due to new or increased bird hazards to aircraft.

The Airport's primary interest with any project at the landfill is that it does not pose a hazard to our flight operations. As you know, a large number of arriving and departing flights fly directly over the landfill. When waste at the landfill is dug up or otherwise disturbed, there is a very real possibility of new and ongoing bird hazards to aircraft developing due to large numbers of birds coming to feed at the landfill. There is a very real threat to the daily operations at Lambert due to the possibility of birds being ingested into aircraft engines and other types of bird strikes.

As we discussed at the meeting, operations at the landfill were shut down in part to eliminate a bird hazard to aircraft. Any new project that will expose putrescible waste at the landfill has the potential to result in a new and ongoing bird hazard to aircraft. The plans shared with the Airport on Wednesday

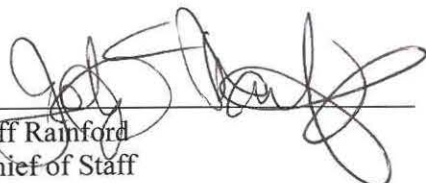
indicate that any isolation barrier alternative will result in substantial amounts of putrescible waste being excavated and managed at the landfill over a long, indeterminate period of time. Due to the amount of putrescible waste being excavated and the lengthy period of the project, the Airport believes there is potential for a bird hazard to develop from the activities associated with the construction of an isolation barrier.

We understand that it is early in the plan design process; and, therefore, the excavation procedures that might provide the Airport with more information relevant to whether it will be possible to perform the project without triggering a bird hazard, have not yet been developed. The Airport, in consultation with the FAA, looks forward to working with you as these plans are developed to ensure the flying public is protected.

We must all recognize, however, that bird hazard control and mitigation is not an exact science. If a bird hazard develops during project implementation, despite the best project plans, the immediate safety of flight operations will be the Airport's and the FAA's primary concern.

We look forward to working with you as the project develops. Please keep us involved in the project planning process so that we can ensure that whatever solution your agency approves does not pose a bird strike hazard to aircraft for any of the 13 million passengers who fly in and out of Lambert each year.

Very truly yours,


Jeff Rainford
Chief of Staff
Office of the Mayor
Rhonda Hamm-Niebruegge
Director of Airports
Lambert-St. Louis International Airport

cc: Mario Pandolfo
Gerald Beckmann