AIR CP_102610102_CP_20160321_Investigation_1314997_

Texas Commission on Environmental Quality
Investigation Report

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Customer: Blue Ridge Landfill TX, LP
Customer Number: CN602820599

Regulated Entity Name: BLUE RIDGE LANDFILL
Regulated Entity Number: RN102610102

Investigation # 1314997

Investigator: ALEJANDRA DE LOS SANTOS

Conducted: 03/21/2016 -- 03/21/2016

Program(s): AIR OPERATING PERMITS

Investigation Type: Compliance Investigation

Additional ID(s): FG0536E
1472

Incident Numbers

Site Classification MAJOR SOURCE

NAIC Code: 562212
SIC Code: 4953
SIC Code: 1521

Location: LOCATED ON 2200 FM 521

Address: 2200 FM 521 RD,
FRESNO, TX , 77545

Local Unit: REGION 12 - HOUSTON

Activity Type(s): SPCI - AIR SPCI - TITLE V SITE PARTIAL COMPLIANCE INV-EPA PCE
SFCI - AIR SFCI - TITLE V SITE FULL COMPLIANCE INV-EPA FCE
FIAIRODOR - AIR FIAIRODOR - FOC INV ODOR SURVEY

Principal(s):

Role	Name
RESPONDENT	BLUE RIDGE LANDFILL TX LP

Contact(s):

Role	Title	Name	Phone	
REGULATED ENTITY CONTACT	ENVIRONMENTAL MANAGER	MR BURGESS STENGL	Office Work	(713) 676-7669 (713) 671-1561
REGULATED ENTITY MAIL CONTACT	LANDFILL OPERATION'S MANAGER	MR MATT MONTAGNA	Cell Fax Office	(832) 347-9496 (281) 835-6146 (281) 668-9739
PARTICIPATED IN	AIR QUALITY MANAGER	MS ARCHANA NAGARAJ	Phone Cell	(817) 735-9770 (817) 597-0646

Other Staff Member(s):

Role	Name
Investigator	ILANA HAIRSTON
QA Reviewer	CORBETT BRINLY
Investigator	PAUL BRANDES
Investigator	GABRIELLE LAMOREAUX
Supervisor	CORBETT BRINLY
Investigator	ROBERT MCLEOD

Associated Check List

Checklist Name	Unit Name
AIR GENERIC INVESTIGATION (10 ITEMS)	Sitewide
AIR INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING revised 06/2013	Sitewide
AIR FOCUSED INVESTIGATON - ODOR SURVEY	Sitewide
AIR ANNUAL COMPLIANCE CERTIFICATION REVIEW - SPCI	Sitewide

Investigation Comments:

INTRODUCTION/ INVESTIGATION SUMMARY

Introduction
This investigation covered the Blue Ridge Landfill (BLR) of the Blue Ridge Landfill TX, LP, located in Fresno in Fort Bend County, operating under Title V permit O-01472, initially issued on December 4, 2000 and last renewed on March 3, 2016. The purpose of the investigation was to determine compliance with applicable state and federal requirements. The on-site portion of the investigation was completed on March 21, 2016.

The surrounding land use is residential and industrial. The nearest residential receptor is at a distance of approximately 0.51 miles east of the working zone at BRL. The distance from the facility property line to the nearest residential receptor is approximately 260 ft.

The following TCEQ investigators participated in the on-site investigation: Ms. Alejandra De Los Santos, Ms. Ilana Hairston, Ms. Gabrielle Lamoreaux, Mr. Kevin McLeod and Mr. Paul Brandes, Optical Gas Imaging Camera (OGIC) Operator.

BRL was represented during the course of the investigation by: Mr. Burgess Stengl, Environmental Manager; Mr. Matt Montagna, Landfill Operation's Manager; and Ms. Archana Nagaraj, Air Quality Manager.

Daily Narrative

Monday March 21, 2016

A perimeter survey was conducted before entering the site. At 7:22 AM, the investigators noted an odor with a smell similar to dead fish while driving west on FM 2234 (See Attachment 1 - Survey Route Map). The investigators returned to the site where the odor was noted, and stopped between Trinity Bay Drive and Kingsley Drive (Attachment 1 - Location A).

At 7:22 AM, the investigators began an odor survey which lasted approximately 40 minutes (See Attachment 2 - Investigators' Odor Logs). The temperature during the odor survey was of 39 °F, clear skies, wind speed 3 miles per hour (mph) coming from the north north east (NNE). Data was taken from the Weather Underground Shadow Creek Ranch station (Station ID: KTXPEARL23). The intensity of the odor was strong during the first 10 minutes, then the smell was only detected when the wind was blowing.

At 7:43 AM, the investigators drove north on Kingsley Drive into a sports complex under construction (Attachment 1 - Location B). No odors were noted at the site.

At 7:49 AM, the investigators drove west on FM 2234. The dead fish smell was noted again while driving through

Trinity Bay Drive and Kingsley Drive. The investigators drove north on FM 512 and then east on Southbelt Industrial Drive. At 7:52 AM, the investigators noted a paint like smell next to Custom Air Products & Services Inc. (CAPS) and F.W. Garter Thermal Spraying, Ltd (Attachment 1 - Location C).

At 8:09 AM, the investigators returned to FM 2234, and drove between Trinity Bay Drive and Kingsley Drive, and noted a very light dead fish smell.

At 8:13 AM, the investigators drove to Reflection Bay Water Treatment plant located at 12155 Shadow Creek Parkway (Attachment 1 - Location D). Odors were not noted at the site.

At 8:22 AM, the investigators drove through the Shadow Creek Ranch neighborhood and noted a very light dead fish smell on Fair Breeze Lane (Attachment 1 - Location E), Shore Breeze Drive (Attachment 1 - Location F) and Rippling Creek Lane (Attachment 1 - Location G).

At 8:30 AM, the investigators drove south on FM 512. No odors were noticed at the site.

The Frequency, Intensity, Duration and Offensiveness (FIDO) chart categorizes putrefying animals and fish as highly offensive. In order to confirm a nuisance, a highly offensive odor has to last one hour with a very strong intensity as a signle occurrence. Since the odor did not have a very strong intensity and did not last one hour, the single occurrence documented during this investigation does not constitute a nuisance based on the TCEQ FIDO protocol. Additionally, the actual source of the odor was not confirmed.

At 8:34 AM, the TCEQ investigators Ms. De Los Santos, Ms. Hairston, Ms. Lamoreaux, Mr. McLeod and Mr. Brandes arrived at BRL.

Facility representatives present during the opening conference included: Mr. Stengl, Ms. Nagaraj, and Mr. Montagna. The investigators explained the purpose, scope, and procedures of the investigation. A brief process description was provided by Mr. Stengl after which the compliance status of applicable state and federal rules was reviewed. In addition, the investigators, accompanied by Mr. Stengl, Ms. Nagaraj, and Mr. Montagna, visited the processing areas and main control room.

The facility tour started at 8:54 AM. Mr. Montagna took the investigators to the Phase 1 area of the landfill. The area is already covered and in a "non-working phase." The wells collect the landfill gases (LFG) to prevent organic compounds from releasing and for odor control. All the wells in this phase were observed with the OGIC and no emissions were noted. Mr. Montagna stated that a contractor, American Environmental Group, performs well emission monitoring every year and maintenance every month.

From the Phase 1 hill, the investigators were able to see the landfill Phase 2 Class 1 cell, where asbestos containing waste was deposited. No activity was being performed the day of the investigation.

Mr. Montagna took the investigators to Phase 3 which is the current working phase of the landfill. At 9:10 AM, the investigators noticed a garbage/trash odor of an offensive nature. The investigators were approximately 700 feet away from the working phase. The garbage/trash odor was not detected outside of the landfill's property line and it was not similar to the dead fish odor detected hours earlier.

Mr. Montagna then took the investigators to where the Enclosed Flare (EPN: Flare2011) and stationary emergency engine (EPN: GENENG 2) are located. This equipment is located in the same area as the Gas Collection and Control System (GCCS). Wells are drilled into the waste hill and vacuum lines are connected. A blower is connected to the wells by the vacuum lines. The purpose of the blower is to create a vacuum on the landfill to extract the landfill gas and send it to either the GCCS or Flare2011.

The GCCS includes a drying station, where the landfill gas is dried prior to being sent out via pipeline to a third party. The station is operated continuously and is powered by a small electric compressor.

The flare and the engine were observed with the OGIC, but no emissions were detected since the units were not operating at the time. Flare 2011 operates only when the third party plant shuts down. The blower is normally powered by electricity from the main electricity grid. The generator (GENENG 2) provides electricity to the blower in the event of an electrical outage. The flare pilot flame is lit by the use of a 5 gallon propane tank. Supervisors make sure the pilot flame is lit prior to the LFG being combusted.

The investigators then drove to the leachate tanks (EPNs: LEACHATE 1 and LEACHATE 2). Mr. Montagna told the investigators that the leachate tanks were halfway empty. The tanks have a bladder (elastic covering that expands and contracts as the tanks fill/empty) to control odors. There were no odors detected at the leachate tanks' location.

The investigators proceeded to the utility flare (EPN: FlareT) which was not currently operating. Engine (EPN: GENENG 1) is located next to the emergency flare and was not operating either.

The walkthrough portion of the investigation ended at 9:25 AM.

Review of the Permit Compliance Certification (PCC) Report dated June 25, 2015:
Certification Period: December 5, 2014 through June 4, 2015
The PCC was postmarked on: June 25, 2015
The PCC was received by the Houston Region Office: June 26, 2015
The PCC was submitted within the required time frame.

Review of the PCC dated December 22, 2015:
Reporting Period: June 5, 2015 through December 4, 2015
The PCC was postmarked on: December 23, 2015
The PCC was received by the Houston Region Office: December 23, 2015
The PCC was submitted within the required time frame.

BRL submits their PCC semi-annually.

The complete PCCs listed above can be found in the regional files.

There were no deviations reported.

Review of State Rules (30 TAC 101, 111, 112, 115, 117, 118, and 122)

A review of the applicable chapters of 30 TAC 101, 111, 112, 115, 117, 118, and 122 was conducted. Permit by Rule (PBR) and New Source Review (NSR) permits are reviewed separately. Specifically, records relating to the following rules were reviewed:

General Air Quality Rules
30 TAC Chapter 101

Nuisance
BRL provided a copy of their Odor Management Plan (OMP) for review. The OMP is a requisite under their Waste Permit 1505A subpart 4.10. The OMP provides the guidelines to verify BRL complies with any applicable air quality requirements. The OMP requires BRL to install and operate a GCCS and misters to minimize odors.

Mr. Montagna explained to the investigators that the misters are 5 foot tall and they are placed every 15 feet or closer on the north east (NE) side of the facility and between the leachate tanks and the Phase 1 landfill area. The substance used in the mister is called Neutraline 5624SF. The MSDS for the mister substance Neutraline states that the substance has a characteristic odor, but it does not specify or describe the smell. Mr. Montagna stated that BRL is in the process of installing more misters along the east side of the property. The GCCS will be discussed further in the report.

Emissions Inventory (EI).
The 2014 and 2015 EI reports were submitted electronically and validated on March 20, 2015 and March 18, 2016, respectively. BRL appears to be in compliance with 30 TAC 101.10.

Emission Fees.
The emission fees for 2014 and 2015 were reviewed. The emission fees paid were in the amount of $5,644.08 and $6,976.04, and were submitted on October 31, 2014 and October 31, 2015, respectively. BRL appears to be in compliance with 30 TAC 101.24.

Reportable and Non-Reportable Emission Fees.
BRL had a total of zero (0) reportable and zero (0) non-reportable emissions events for the December 5, 2014 to December 4, 2015 compliance period (here on referred as compliance period). BRL appears to be in compliance with 30 TAC 101.201.

Maintenance, Startup and Shut-down (MSS).
Mr. Stengl and Mr. Montagna stated that there had been zero (0) MSS events during the compliance period which resulted in unauthorized emissions. BRL appears to be in compliance with 30 TAC 101.211.

Control of Visible Emissions and Particulate Matter (PM)
30 TAC Chapter 111

BRL has 2 flares on site, the Enclosed Flare (EPN Flare2011) and the Utility Flare (EPN Flare T). The enclosed flare operated for only 521 hours in 2014 and 1,388 hours in 2015, while the utility flare has not operated since 2006. Mr. Montagna stated that the enclosed flare is only operated when the GCCS is not operating.

Visible emission (VE) records for 2015 were reviewed. According to the flare operation logs provided by BRL, observations are performed only when the flare is in operation. No emissions were noted during the observation periods. BRL appears to be in compliance with 30 TAC 111.111(a)(4) (A)(ii).

Mr. Stengl and Mr. Montagna stated that there was no outdoor burning activity or fire training conducted at BRL during the compliance period. BRL appears to be in compliance with 30 TAC 111.201 and 111.205.

Control of Sulfur Compounds (SO_2 and H_2S)
30 TAC Chapter 112

The flares are fueled with landfill gas (LFG) produced by the facility and the engines are fueled with diesel. BRL provided a Material Safety Data Sheet (MSDS) for No. 2 Diesel Fuel which indicated that the diesel is low in sulfur. BRL is not required to demonstrate compliance with sulfur dioxide (SO_2) emission limits, unless requested by the agency under 30 TAC 101.8(a). BRL appears to be in compliance with 30 TAC 112.2.

Control of Volatile Organic Compounds (VOC)
30 TAC Chapter 115

Storage of VOCs
There are 4 storage tanks at BRL (EPNs GASOLINE, DIESEL, LEACHATE1 and LEACHATE 2). The Leachate 1 and 2 tanks are exempt under 30 TAC 115.111(a)(1) since the vapor pressure of leachate is less than 1.5 psia, as stated in the landfill's Title V permit. Ms. Nagaraj stated that the leachate tanks are rarely emptied and typically they are lowered to approximately 2 ft. The leachate is sent to the City of Pearland sewer tie-in via force main. The disposal occurs on Mondays, as requested by the City of Pearland, and no treatment is performed since it is not required.

The gasoline tank is exempt per 30 TAC 115.111(a)(8) since it has a capacity of 1,000 gallons (gal). The diesel tank has a capacity of 10,000 gal and a vapor pressure of less than 0.5 pounds per square inch (psia). The diesel tank is also exempt per 30 TAC 115.111(a)(1) because the true vapor pressure for diesel is less than 1.5 psia.

Municipal Solid Waste
The EI submitted by BRL includes non-methane organic compounds (NMOC). The NMOC concentration for 2014 was of 600 ppmv and 745 ppmv for 2015. The control requirements are addressed in 40 CFR 60 Subpart WWW and 40 CFR 60 Subpart A. See these sections for details.

Loading and Unloading of VOCs
BRL provided logs of the gasoline and diesel throughput from 2014 and 2015. The gasoline tank had an annual throughput of 2,697 gal/yr in 2014 and 3,500 gal/yr in 2015. The gasoline tank is exempt under 30 TAC 115.217(a)(2)(B) for loading less than 4,000 gal per day. The diesel tank had an annual throughput of 220,247 gal/yr in 2014 and 285,561 gal/yr in 2015. The diesel tank is exempt under 30 TAC 115.217(a)(1) and 30 TAC 115.216(3)(B) for having a vapor pressure less than 0.5 psia and for having a daily throughput of less than 20,000 gallons. Mr. Montagna stated that there were no visible leaks detected when unloading from the tanks. BRL appears to be in compliance with 30 TAC 115.214(a)(1)(A)(i).

Filling of Gasoline Storage Vessels
BRL is exempt from the requirements of 30 TAC 115.227(1) since the facility dispenses less than 10,000 gallons of gasoline in any calendar year. BRL appears to be in compliance.

Degreaser Unit
BRL has a parts washing unit on site with a capacity of 30 gallons. The solvent used has a vapor pressure of 0.019 psia measured at 100 degrees Fahrenheit; therefore, it is exempt per 30 TAC 115.411(1). Mr. Montagna stated that a third party contractor disposes of the solvent once a quarter or when necessary since the unit is not used daily. BRL appears to be in compliance.

Surface Coating
BRL used 450 gallons of water based paint during 2014 and none during 2015. The MSDS for the surface coating (Allied Waste Blue Premium Aqua Enamel) used in 2014 was review on site. BRL appears to be in compliance with 30 TAC 115.421(a) and 115.426(1)(A).

Control of Nitrogen Compounds (NOx)
30 TAC Chapter 117

BRL has two engines on site, GENENG 1 and GENENG 2. GENENG 1 was installed in 2001 and has a horse power rating of 166. The engine operated for 35 hours in 2014 and 48 in 2015. GENENG 2 was installed in 1994 and has a horse power rating of 600. The engine operated 58 hours in 2014 and 45 hours in 2015. Both engines are exempt from 30 TAC 117.303(a)(11) for operating less than 100 hours a year. Mr. Montagna stated that the engines are used for emergency purposes only; therefore, the engines are not run between 6:00 AM and 12:00 PM for maintenance or testing. BRL appears to be in compliance with 117.310(f).

Control of Air Pollution Episodes
30 TAC Chapter 118

BRL is located in Fort Bend County. Facilities located in Fort Bend County are not required to have an Emission Reduction Plan. 30 TAC Chapter 118 is not applicable.

Federal Operating Permit (FOP) Program
30 TAC Chapter 122

Title V Permit Special Term and Condition (ST&C) Requirements

BRL's Title V Permit (O-01472) is a General Operating Permit (GOP) that uses the GOP 517 Municipal Solid Waste Landfill (MSWLF) checklists for compliance determination. Applicable terms from the GOP 517 and checklist items are addressed in applicable 30 TAC rules and 40 CFR rules.

Discussion of Reported Deviations

There were no deviations reported.

Review of Federal Regulations

A review of the applicable subparts of 40 CFR 60 - Standards of Performance for New Stationary Sources (NSPS), 40 CFR 61 - National Emission Standards for Hazardous Air Pollutants (NESHAP), and 40 CFR 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT) was conducted. Specifically, the following records were reviewed:

NSPS
40 CFR Part 60

Subpart A
The utility flare and the enclosed flare are subject to Subpart A. The utility flare (Flare T) has not been used since 2006. The enclosed flare (Flare2011) is only used when the GCCS is not operating. The Flare2011 pilot flame is fueled using propane.

The enclosed flare performance test, dated April 3, 2012, was reviewed. The test was performed to demonstrate continuous compliance with the federal New Source Performance Standards (NSPS) for Municipal Solid Waste Landfills (MSWL). The average measured nonmethane organic compound (NMOC) emission rate was determined to be less than 0.02 parts per million by volume (ppmv).

The 2014 EI supporting documentation for Flare2011 was reviewed. The report stated that the lower heating value for LFG was 500 Btu/scf. The reports also states that the annual heat release was 81,364,964 Btu/hr. An initial performance test report for Flare2011, dated May 1, 2006, states that the maximum flare tip velocity is 55.0 feet per second (ft/s) and the net heating value was 511 Btu/scf. BRL appears to be in compliance with 40 CFR 60.18, Subpart A.

Subpart WWW
BRL has a design capacity of 93,309,936 Megagrams (Mg) and a nonmethane organic compounds (NMOC) emission rate greater than 50 Mg per year. BRL is required to submit a GCCS design plan. The most current design plan is dated December 16, 2010. This plan incorporated the site's current GCCS, future built-outs, system monitoring and compliance alternatives. The current waste in place for 2015 was 10,628,975 Mg, and the year-by-year waste acceptance rate for 2015 was 626,606 Mg/yr. BRL appears to be in compliance with 40 CFR 60.752(b)(2)(i)(A), 60.758(a), 30 TAC 115.152(a)(1).

Landfill gas (LFG) is routed to the GCCS which sends the gas to an independent third party landfill gas to energy (LFGTE) facility. Any LFG not sent to the LFGTE facility is diverted to the onsite flare. BRL appears to be in compliance with 40 CFR 60.752(b)(2)(iii), 30 TAC 115.152(a)(2)(A) and 115.152(a)(2)(C).

BRL is required to submit a Semi-Annual NSPS report as per 40 CFR 60.757. NSPS reports dated December 23, 2014, June 25, 2015 and December 22, 2015 were reviewed. The extraction well data report from June 2015 through December 2015 was reviewed. There are currently 164 wellheads at BRL, including newly installed. Mr. Montagna stated that there are plans for installing more wellheads in the future. Each wellhead of the GCCS is equipped with a sampling port and a means for measuring LFG temperature, pressure and oxygen. The wellheads are monitored every month by a third party contractor. BRL appears to be in compliance 60.753(c), and 60.756(a).

Wellheads BLRGEW01 and BLRGEW10 had negative pressure readings, but wellhead BLRGEW22 had four positive readings. Mr. Stengl stated that if positive pressure existed in a well, the corrective action plan was initiated immediately. The corrective action plan states that if exceedances cannot be fixed within 15 days, the GCCS must be expanded within 120 days of the initial exceedance. An Alternative Timeline Request (ATR) letter dated November 11, 2015 was reviewed. In the letter, BRL requests an alternative timeline of 90 days to expand the GCCS. If the well does not come into compliance within the required time, the well will be classified as nonproducing. Wellhead BRLGEW22 was classified as nonproducing. BRL appears to be in compliance 60.755(a)(3).

Temperatures of wellheads BLRGEW27, BLRGEW31 and BLRGEW36 was reviewed, showing no exceedances in temperatures. The oxygen levels of wellheads BLRGEW39, BLRGEW46 and BLRGEW54 were reviewed. Wellheads BLRGEW46 and BLRGEW54 had oxygen reading over 5%, but BRL has an alternative in the GCCS plan stating that LFG extraction wells with three consecutive months of oxygen reading over 5% cannot be attributed to a specific event or operation of the system. BRL appears to be in compliance with 60.753(c).

BRL GCCS design plan states that in the event that actual LFG flow rates exceed the current GCCS design capacity, additional components will be designed and installed in accordance with NSPS requirements.

A third party contractor performs surface emission monitoring every quarter at BRL. Monitoring records dated September 10, 2015 and December 10, 2015 were reviewed. A Photovac (MicroFID) flame ionization detector (FID) was used to perform the emissions monitoring. Attention was given to stressed vegetation, cracks, seeps, and areas with unusual odors. The results stated that the ground surface appeared to be in good condition and there were no unusual odors noted. BRL appears to be in compliance with 60.753(d).

BRL is authorized, per TCEQ Municipal Solid Waste (MSW) permit 1505A, to receive municipal solid waste which includes household solid waste, commercial solid waste, construction and demolition waste and yard waste. BRL also receives Class 1, Class 2 and Class 3 non-hazardous industrial solid waste; and certain special wastes such as

asbestos containing materials. Ms. Nagaraj stated that all waste received is covered daily with a minimum of 6 inches of soil. Class 1 waste, asbestos, is separated from the household waste and buried in the Phase 2 Class 1 section of the landfill. BRL appears to be in compliance with 60.755(c)(5).

NESHAP
40 CFR Part 61

BRL accepts asbestos containing materials. Monthly asbestos waste log sheets from 2015 were reviewed. The documents include maps with the location of the disposal area, which is divided in grids, and the amount and cover method. BRL received 299 cubic yards (CY) of asbestos waste on December 2015. Mr. Montagna stated that all asbestos containing waste was covered with 12 inches of soil each operating day per MSW permit 1505A. BRL appears to be in compliance with 40 CFR 61.154(c)(1).

MACT
40 CFR Part 63

Subpart AAAA
BRL is required to submit Startup, Shutdown and Malfunction (SSM) reports semi-annually. BRL implemented a SSM plan on June 26, 2004. The SSM reports were included with the NSPS report reviewed dated December 22, 2015. There were no malfunctions, no emission events, startups, shutdowns and/or malfunctions during the compliance period. Additionally, there were no revisions made to the SSM plan during the reporting period. BRL appears to be in compliance with 40 CFR 63.1930, 63.1955, 63.1960, and 63.1980(a).

Subpart CCCCCC
The yearly throughput of the gasoline tank was 2,697 gal/yr in 2014 and 3,500 gal/yr in 2015. Mr. Montagna stated that there were no spills, no gasoline sent to open waste collection systems and no open gasoline containers during the compliance period. BRL appears to be in compliance with 40 CFR 63.1116.

NSR Permit Requirements Incorporated into Title V
30 TAC Chapter 116

BRL has Standard Permit 81004 issued in February 20, 2007 and last renewed on February 16, 2012. The issuing of this permit resulted in the voiding, and merging into the standard permit, of Permit-By-Rule (PBR) 77271 and 77703. The permit authorizes the MSW landfill, the flares, the storage tanks, the mist sprayers, the parts washer and the generators under 30 TAC 330, Subchapter U. These emission sources have been previously discussed in the report.

Exit Interview
An exit interview form was not completed since there were no alleged violations, additional issues, or records requested.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description
Blue Ridge Landfill is a waste disposal facility. Additional information can be found in the Houston Region Office files.

BACKGROUND

Agreed Orders, Court Orders, and Other Compliance Agreements
Based on a review of CCEDS, regional office files, and the enforcement database, there were no agreed orders, court orders, or other compliance agreements related to air quality violations for the site.

Prior Enforcement Issues
Previous enforcement actions were not reviewed because violations were not discovered during this current investigation.

Complaints
Information regarding complaints for this site can be found in the Houston Region file room.

ADDITIONAL INFORMATION

Conclusions, Recommendations, and Current Enforcement Actions
Based on this investigation, BRL appears to be in compliance with state and federal rules. No violations were noted during this investigation. A General Compliance letter will be issued.

Additional Issues
No additional issues were noted during this investigation.

REPORT ATTACHMENTS
(1) Survey Route Map
(2) Investigators' Odor Logs
(3) TCEQ Odor Investigation Checklist

No Violations Associated to this Investigation

Signed _____ **Date** 6/3/16
Environmental Investigator

Signed _____ **Date** 6-6-2016
Supervisor

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
X Letter to Facility (specify type) : Compliance Investigation Report
___Sample Analysis Results
___Manifests
___Notice of Registration
___Maps, Plans, Sketches
___Photographs
___Correspondence from the facility
X Other (specify) :
1. Survey Route map
2. Investigators' Odor Logs
3. TCEQ Odor Investigation Checklist.

Attachment 1:

Survey Route Map

Blue Ridge Landfill TX, LP

RN 102-610-102

CN 602-820-599

Date: March 21, 2016

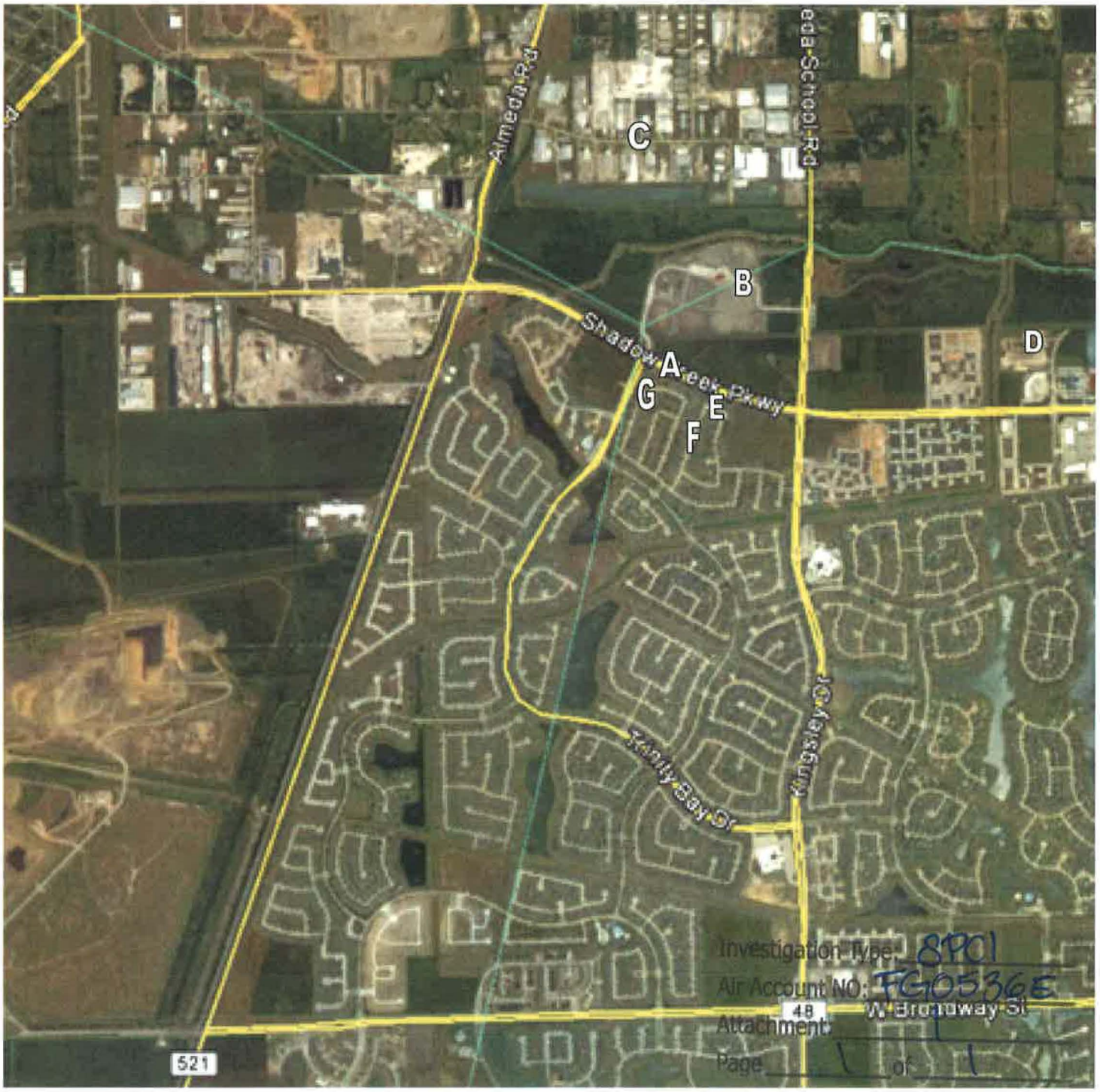
Odor Survey Route Map

Weather

Conditions:	**Clear**	Partly Cloudy	Cloudy	Overcast	Rain
Wind Speed:	3 mph		**Wind From:** NNE		
Temperature:	56.8 °F				
Humidity:	56 % RH				

NW	NNW	N	NNE	NE
WNW				ENE
W				E
WSW				ESE
SW	SSW	S	SSE	SE

▶ Diagram



Attachment 2:

Investigators' Odor Logs

Blue Ridge Landfill TX, LP

RN 102-610-102

CN 602-820-599

Date: March 21, 2016

Investigator's Odor Intensity Time Log

Date of Investigation: I. Hairston 3/21/16 Start Time 7:22 AM
Name and Address of Alleged Source:
Investigator's Name: Print: I. Hairston Sign:

Minutes	Odor Intensity VL, L, M, S,VS	
1 min	S	(clean ash smell) 722
2	S	2234 + Trinity Baylor
3	S	
4	S	
5	S	
6	M	
7	M	
8	S	
9	M	
10	L	
11	S	
12	—	Kingsley Drive 2834 - Sports Center
13	—	
14	L	
15	L	8:04 - Rippling Creek Ln.
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		

Minutes	Odor Intensity VL, L, M, S, VS
31 min	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	
42	
43	
44	
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46	
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51	
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53	
54	
55	
56	
57	
58	
59	
60	

Wind North-Northeast

7:34 Trinity Bay

7:41

822 Fairvaxeed St.

Offensiveness: Highly X Offensive _____ Unpleasant _____ Not Unpleasant _____

Dominant Odor Intensity For:

	VS	S	M	L	VL	No Odor
1 Min		X				
10 Min		X				
1 Hour						X

Investigation Type: SPCI
Air Account NO: FG05366
Attachment: 8
Page 1 of 3

Blank

Investigation Type: SPC1

Air Account NO: FG0536E

Attachment: Q

Page 2 of 3

Investigator's Odor Intensity Time Log

Date of Investigation: 3/21/2016 Start Time 7:34

Name and Address of Alleged Source:

Investigator's Name: Print: Gabrielle Sign:

Minutes	Odor Intensity VL, L, M, S,VS
1 min	S
2	M
3	L
4	M
5	L
6	L
7	M
8	
9	
10 44	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	

leave at 7.41

Minutes	Odor Intensity VL, L, M, S, VS
31 min	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	
42	
43	
44	
45	
46	
47	
48	
49	
50	
51	
52	
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54	
55	
56	
57	
58	
59	
60	

Investigation Type: SPCI

Air Account NO: FG0536E

Attachment: 8

Page 3 of 3

Offensiveness: Highly X Offensive _____ Unpleasant _____ Not Unpleasant _____

Dominant Odor Intensity For:

	VS	S	M	L	VL	No Odor
1 Min		X				
10 Min						X
1 Hour						X

Fishy

Attachment 3:

TCEQ Odor Investigation Checklist

Blue Ridge Landfill TX, LP

RN 102-610-102

CN 602-820-599

Date: March 21, 2016

NUISANCE ODORS

Odor Detected: (Yes) **No** (if no, skip to Narrative)

ODOR OFFENSIVENESS:

(Highly Offensive) Offensive Unpleasant Not unpleasant

TYPE/DESCRIPTION OF ODOR:

The odor noted during the investigation had a dead fish smell. According to the TCEQ odor complaint investigation procedures, a putrefying animals/fish odor is characterized as highly offensive. However, the source of the odor was undetermined.

ODOR INTENSITY

Dominant Odor Intensity For:

	Very Strong	Strong	Medium	Light	Very Light	N/A
1 Min.		X				
10 Min.		X				
1 Hr.						X

ODOR FREQUENCY:

Single Event	Daily	Weekly	Monthly	Quarterly
X				

NARRATIVE

Complainant Odor Log given to complainant: YES (NO)

Complainant Odor Log attached: YES (NO)

COMPLAINANT COMMENTS:

INVESTIGATOR COMMENTS:

Investigation Type: OPCI

Air Account NO: IG0536E

Attachment: 3

Page 1 of 2

TCEQ- ODOR INVESTIGATION CHECKLIST

Investigators Name: Alejandra De Los Santos

Investigation Date: March 21, 2016

SITE INFORMATION

Regulated Entity: Blue Ridge Landfill

Address/Location: 2200 FM 512, Fresno TX

Regulated Entity No.: 10 26 010 2

HEALTH EFFECTS

INVESTIGATOR (During Investigation):

☐ Nausea ☐ Headache ☐ Irritation: (Skin Eyes Nose Throat)
☐ Dizziness ☐ Breathing Difficulty
☐ Other _____

COMMENTS:
No health effects noted during the odor survey.

COMPLAINANT (historical):

☒ Nausea ☒ Headache ☐ Irritation: (Skin Eyes Nose Throat)
☐ Dizziness ☒ Breathing Difficulty
☐ Other _____

COMMENTS:
The odor identified at the site was not described by any of the complainants.

Investigation Type: SPCI
Air Account NO: EG0536E
Attachment: 3
Page 2 of 2

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 6, 2016

Mr. Matt Montagna, Landfill Operation's Manager
Blue Ridge Landfill TX, LP
2200 FM 521 Road
Fresno, Texas, 77545

Re: Compliance Evaluation Investigation at:
Blue Ridge Landfill, 2200 FM 521 Road, Fresno (Fort Bend), Texas
Regulated Entity No.: 102610102, TCEQ ID No.: FG0536E, FOP No.: O-01472,
Investigation No.: 1314997

Dear Mr. Montagna:

On March 21, 2016, Ms. Alejandra De Los Santos of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for air quality. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Alejandra De Los Santos in the Houston Region Office at (713) 422-8959.

Sincerely,

Corbett Brinly
Team Leader
Houston Region Office

CB/AD/dgl

cc: Mr. Burges Stengl, Environmental Manager, Blue Ridge Landfill TX, LP, 5757 A Oates Road, Houston, Texas, 77078