ATTACHMENT 8

CORRESPONDENCE

RN: 102-610-102

CN: 602-820-599

BLUE RIDGE LANDFILL

FRESNO, FORT BEND COUNTY

INVESTIGATION # 1370033

OCTOBER 18, 2016 TO NOVEMBER 10, 2016

Environmental Investigator
Air Section
Region 12 - Houston Regional Office
5425 Polk Ave., Suite H, Houston, TX 77023
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TCEQ Comprehensive Compliance Investigation

Company	Location	Account #
Blue Ridge Landfill	Fort Bend County	FG-0536-E
Fresno, TX	**Regulated Entity**	**Customer Ref. #**
	RN102-610-102	CN-602-820-599
Address:	2200 FM 521 Road, Fresno, TX	

Records Requested Due Date:	October 27, 2016

Post-Investigation Records Request List

If there are documents that you feel are **CONFIDENTIAL**, please **mark** them as such.

1. Provide the name of the database used by the surface monitoring contractor that is used to document the emissions. The surface scans are performed by a third party consultant. The third party consultant documents all exceedances over 500 ppm as required by the regulations. Exceedances over 500 ppm are then documented and provided to the landfill in a written report. There is no database that tracks surface scans.

2. Provide the data from each monitoring event for the four (4) previous quarters
   a. This includes the raw data for each monitoring event. (e.g. the measurements when the technician is doing the monitoring) The data from each monitoring event for the four previous quarters is attached to the e-mail.

3. Provide the calibration gas certificates for the gases used to calibrate the monitoring equipment. The third party consultant rents the meters from a third party vendor. The third party vendor provides the calibration gas for the meters. Calibration gas accuracy / purity certificates are not provided, however, the vendor has been contacted to find out what certifications are available.

4. Provide the paths used by the monitoring technicians as well as marking the spots where monitoring occurred. The final configuration map is attached, and the current layout maps are within the quarterly reports.

5. Provide a copy of the monitoring plan for the facility. Attached

6. Quarterly calibrations of the monitoring equipment, these are separate from the pre-monitoring calibrations. As mentioned above, the meters are rented from a third party vendor, and they also perform instrument calibrations before the meter leaves their facility. The third-party consultant completes the Republic required paperwork, and includes those documents in the SEM reports. The instrument vendor has been contacted to determine what certifications can be provided for the meters rented for the SEM events in the requested time frame.

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APPENDIX E

SURFACE EMISSIONS MONITORING PLAN

LANDFILL SURFACE EMISSIONS MONITORING PROTOCOL

This surface emissions monitoring protocol is submitted to comply with the requirements of the NSPS under 40 CFR §60.753(d).

Sampling Methods and Procedures

A surface concentration below 500 parts per million (ppm) methane above background indicates proper operation of the GCCS. The following test methods and procedures will be followed during surface emissions testing to satisfy §60.753(d) of the NSPS.

- A portable monitor in general conformance with 40 CFR Part 60, Appendix A, Method 21 will be used to determine the methane concentration at each sampling point. The instrument will be calibrated, according to the manufacturer's recommendations, for methane, diluted to a nominal concentration of 500 ppm in air.

- Monitoring will be performed during typical meteorological conditions.

- The background concentration will be determined by moving the probe inlet upwind and downwind outside the refuse permit boundary of the landfill.

- The detector probe will be positioned within 2 to 4 inches (5 to 10 centimeters) from the ground surface or top of the vegetation during surface scans.

- Much of the landfill surface at closure will be completed with steep slopes. As provided for in the NSPS, areas with steep slopes or other dangerous areas may be excluded from the surface testing. As described in Section 5.1, the landfill surface will be constructed with drainage swales that can be safely accessed. The proposed alternative pattern shown in Drawing E-1 utilizes these drainage swales for safe access while monitoring of surface emissions. However, when possible, a pattern of parallel lines approximately 100 feet (30 meters) apart will be followed over the surface area of the landfill that contains buried refuse.

- The monitoring plan shown on Drawing E-1 depicts the monitoring pattern following closure. During interim surface emission monitoring, the pattern may differ based on landfill development patterns and surface topography at the time of the monitoring events.

- Conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals and where visual observation indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover.

- Any detection of 500 ppm or more above background will be recorded as an exceedance. The location of the exceedance will be marked and recorded. Cover maintenance or adjustments to the GCCS will be made and the location will be re-monitored within 10 calendar days of the initial exceedance. If the re-monitoring of the location shows a second exceedance, additional corrective action will be taken and the location will be re-monitored within 10 days of the second exceedance. A proposed corrective action plan and corresponding timeline will be submitted to the TCEQ for approval for any location where monitored methane concentration equals or exceeds 500 ppm above background three times within a quarterly period.

- Any location that initially exhibits an exceedance but has a methane concentration less than 500 ppm above background at the 10 day re-monitoring, will be re-monitored within one month from the date of the initial exceedance. If the one month re-monitoring shows a concentration less than 500 ppm above background, no further monitoring of that location will be performed until the next quarterly monitoring period. If the one month re-monitoring shows an exceedance, the location will be re-monitored within 10 calendar days of the second exceedance. A proposed corrective action plan and corresponding timeline will be submitted to the TCEQ for approval for any location where the monitored methane concentration equals or exceeds 500 ppm above background three times within a quarterly period.

Frequency

Surface emissions monitoring will be performed quarterly. After closure, should surface emissions monitoring for three consecutive quarterly monitoring periods fail to detect a reading exceeding 500 ppm above background at any point, monitoring will then reduced to annually. The site will return to quarterly monitoring should a methane reading be detected above 500 ppm or more above background during the annual surface emissions monitoring.

Recordkeeping

The location of each exceedance recorded during the surface emissions monitoring will be reported in the semi- annual report to the TCEQ. Reports and monitoring records will be maintained with the site records for a period of five years.

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