

ATTACHMENT 1

Maps

16 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

Area Map

Investigation Date: April 30, 2018 – July 6, 2018

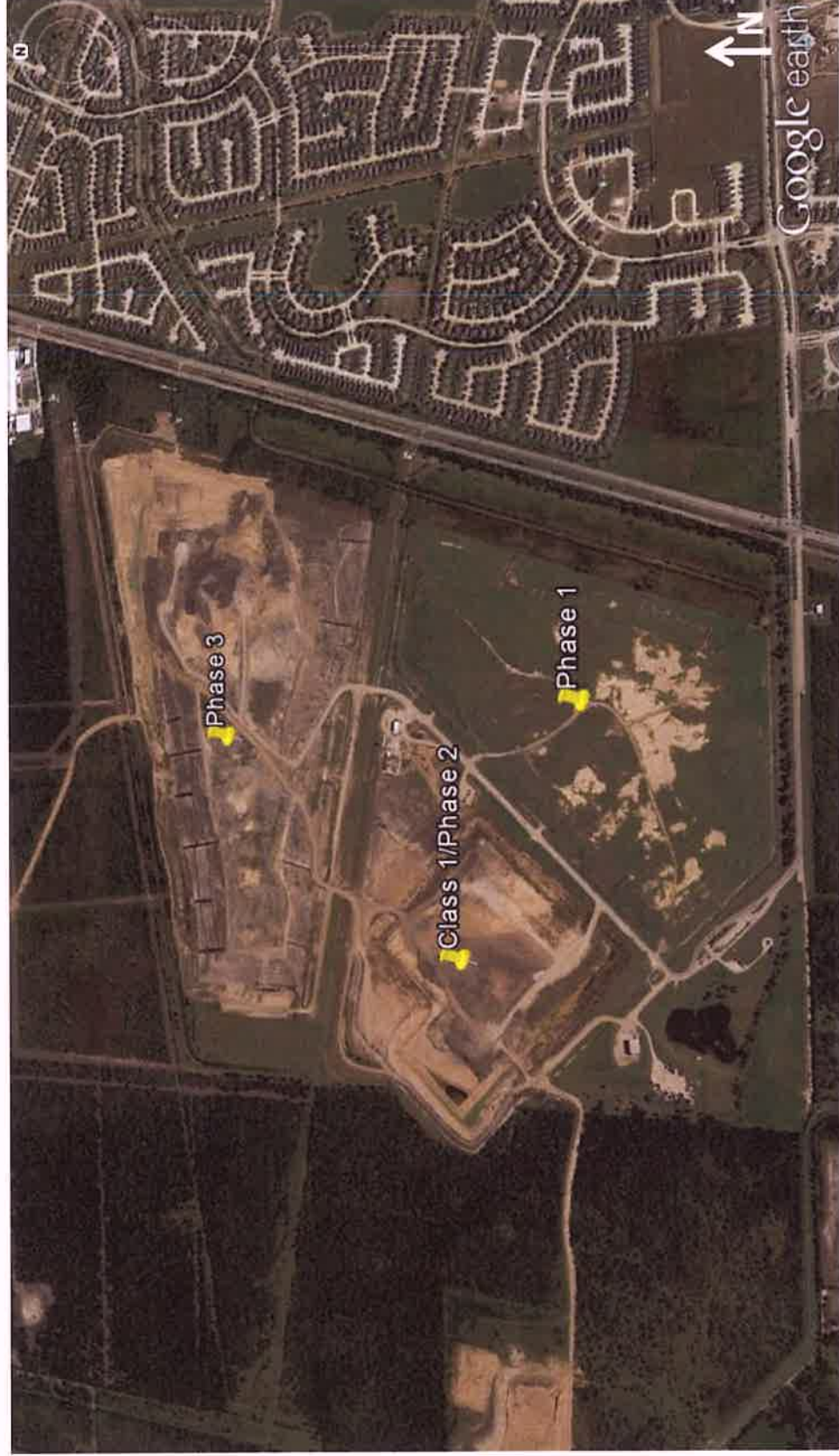
Blue Ridge Landfill

Fresno, Fort Bend County



Site Map

Investigation Date: April 30, 2018 – July 6, 2018
Blue Ridge Landfill
Fresno, Fort Bend County



May 11, 2018: Email Coordinates Phase 1 Map

Date: April 30, 2018 – May 4, 2018

Blue Ridge Landfill

Fresno, Fort Bend County



May 11, 2018: Email Coordinates Phase 3 Map

Date: April 30, 2018 – May 4, 2018

Blue Ridge Landfill

Fresno, Fort Bend County

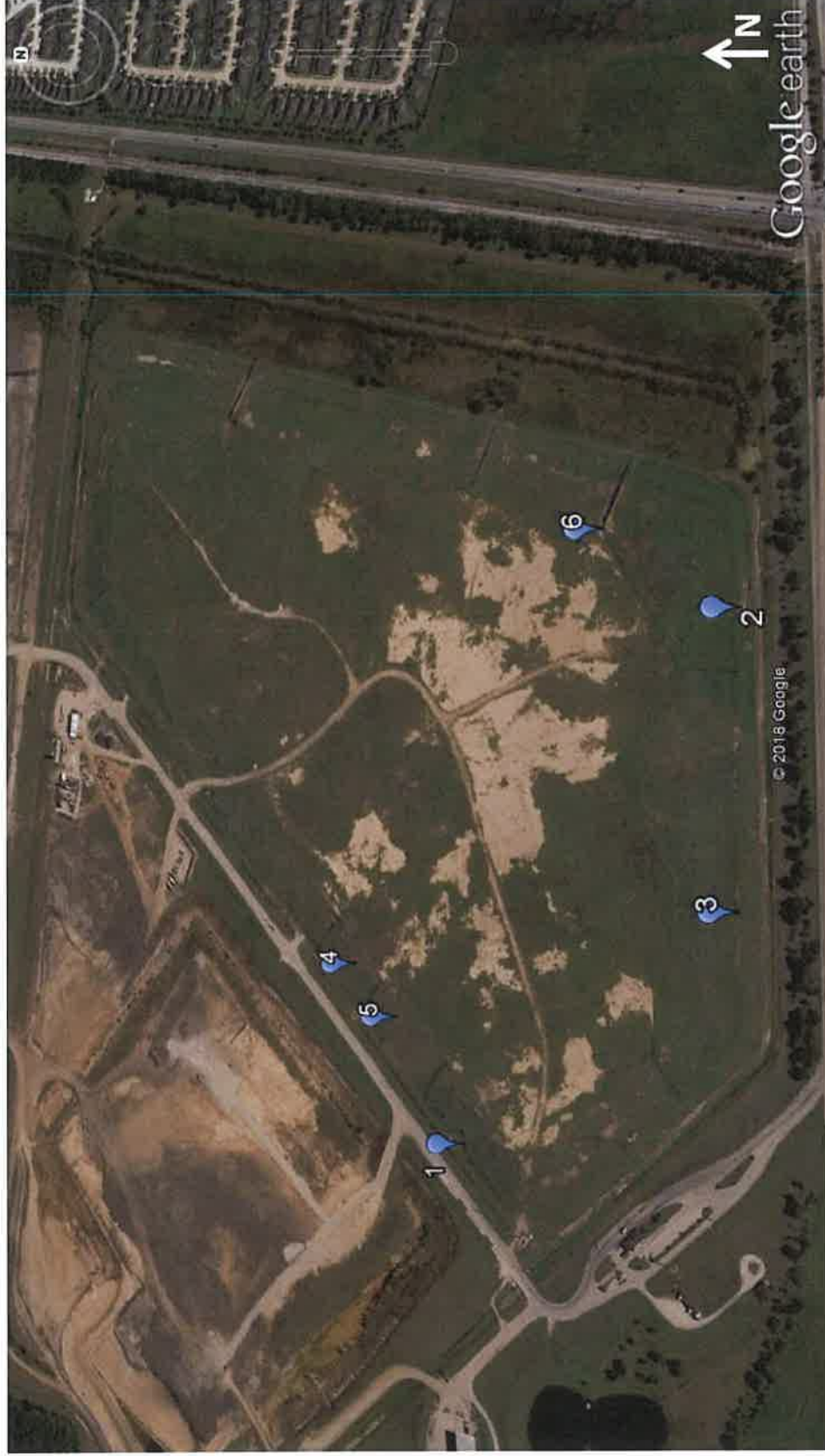


May 29, 2018: Email Coordinates Phase 1 Map

Date: April 30, 2018 – May 4, 2018

Blue Ridge Landfill

Fresno, Fort Bend County

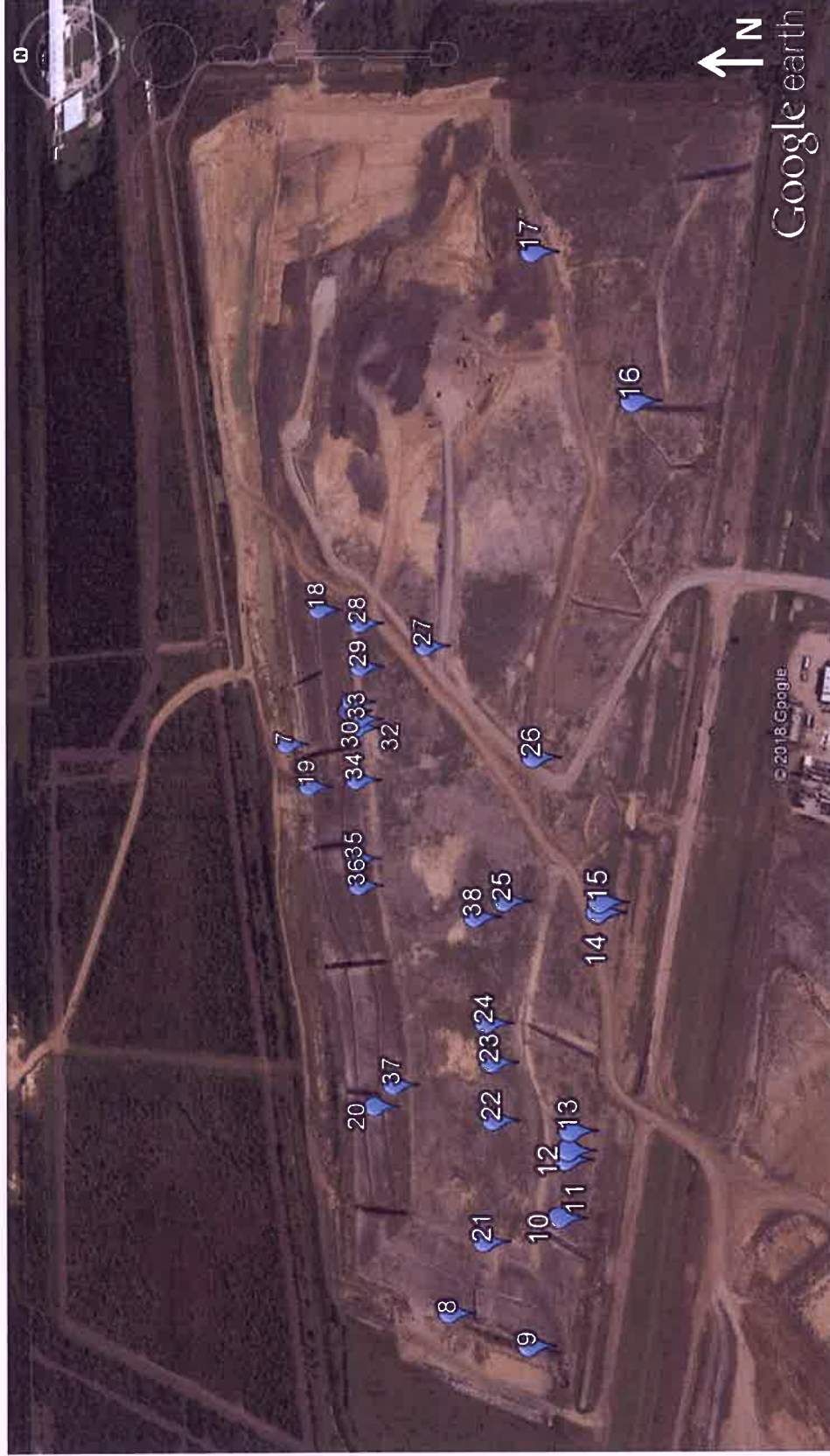


May 29, 2018: Email Coordinates Phase 3 Map

Date: April 30, 2018 – May 4, 2018

Blue Ridge Landfill

Fresno, Fort Bend County

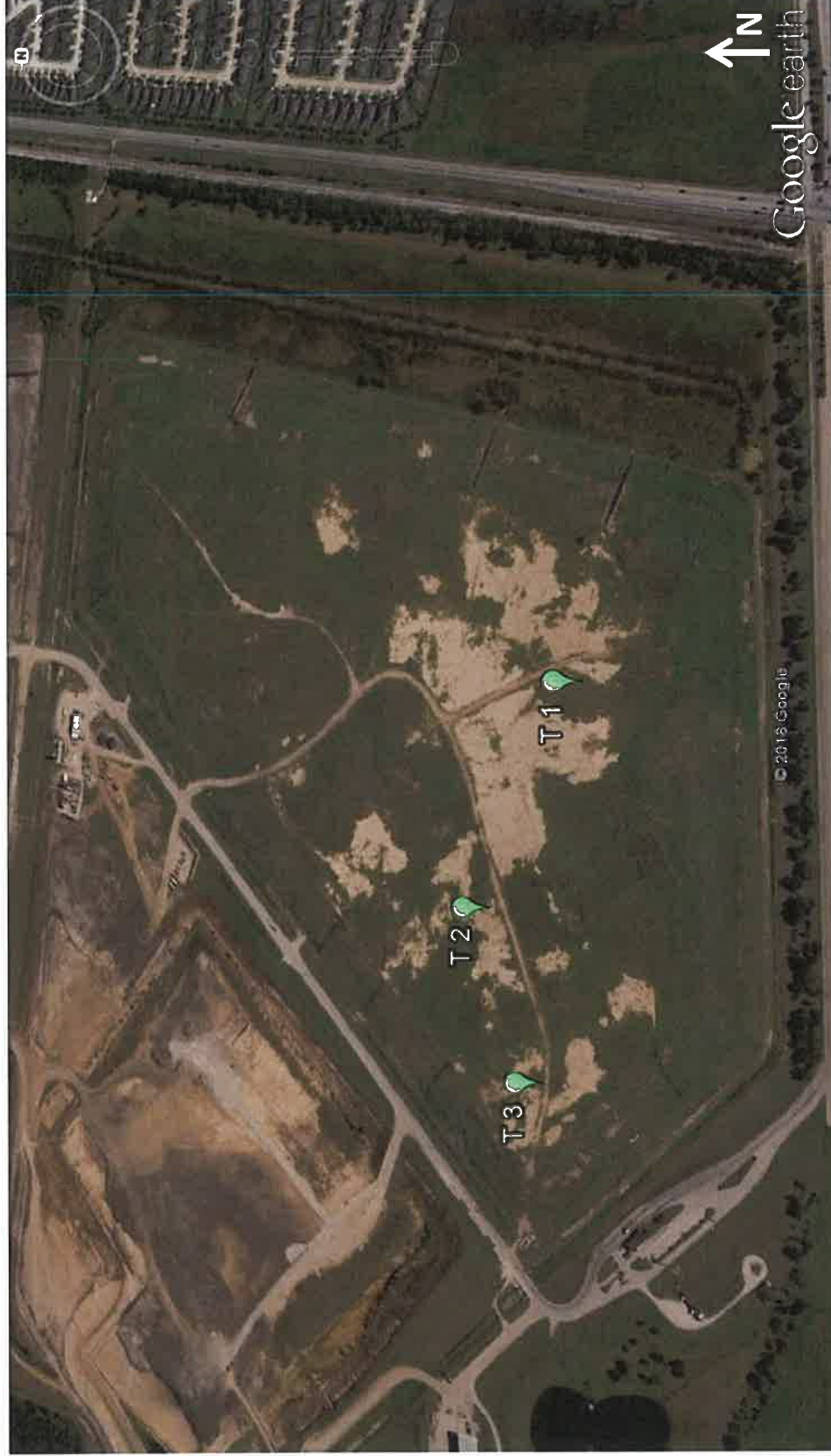


TCEQ SEM Phase 1 Exceedance Location Map

Date: April 30, 2018 – May 4, 2018

Blue Ridge Landfill

Fresno, Fort Bend County

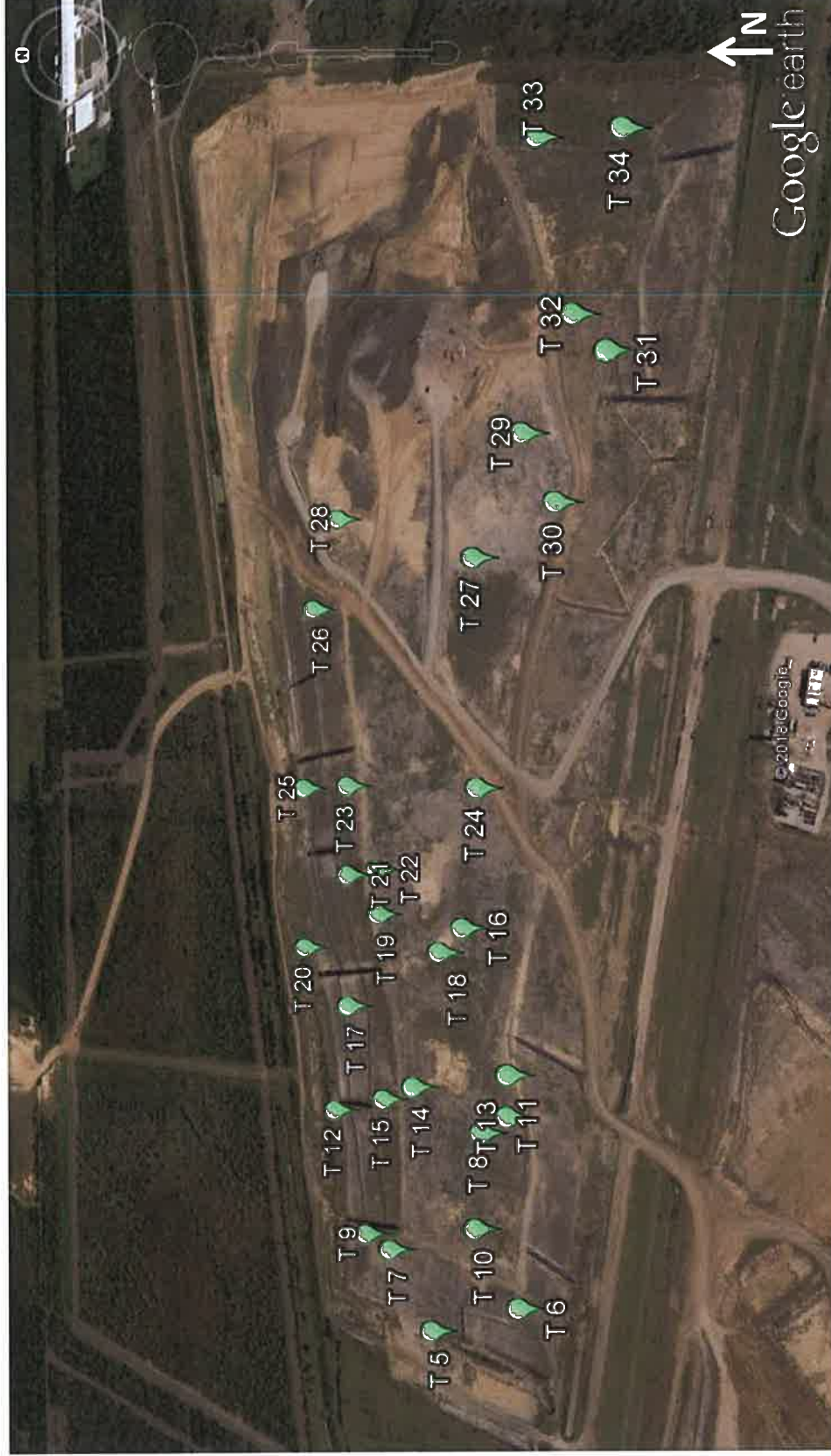


TCEQ SEM Phase 3 Exceedance Location Map

Date: May 15, 2018 – May 24, 2018

Blue Ridge Landfill

Fresno, Fort Bend County



ATTACHMENT 2

May 11, 2018: Email Coordinates

2 pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

Samuel Cortez

From: Stengl, Burgess
Sent: Friday, May 11, 2018 1:43 PM
To: Samuel Cortez
Cc: Trebus, Scott; Rogers, Brandon; Montagna, Matthew
Subject: Blue Ridge Landfill SEM Follow-ups

Sam, Chance mentioned that you had called and asked about coming for SEM follow-ups at Blue Ridge next Monday. Unfortunately, Mario Nunez will not be back at the landfill until late Wednesday, or early Thursday. In addition, AEG will need to coordinate retrieving the meter as it is a rental unit, and was being sent for calibration prior to the 30 day rechecks.

I also left you a voice message on your office phone with the same information.

For the locations, please see below:

Phase 1:

LAT WGS84	LON WGS84
29.55759	-95.4511
29.55501	-95.4458
29.55507	-95.4485
29.55878	-95.4494
29.55619	-95.445

Phase 3:

LAT WGS84	LON WGS84
N/A	N/A
29.56636	-95.453528
29.5654	-95.453518
29.56514	-95.452103
29.56506	-95.451527
29.56502	-95.451352
29.56502	-95.451213
29.56466	-95.44903
29.56465	-95.4489
29.56428	-95.444138

Investigation Type: FIAIR MON
Air Account NO: FG-0536-E
Attachment: 2
Page: 1 of 2

29.56534	-95.442358
N/A	N/A
29.56826	-95.447893
29.56734	-95.451493
N/A	N/A
29.56581	-95.451287
29.56584	-95.450755
29.5659	-95.450238
29.56569	-95.448988
29.56542	-95.447495
29.56673	-95.446295
N/A	N/A
29.56754	-95.446512
29.56762	-95.446895
29.5677	-95.44695
N/A	N/A
29.56757	-95.447173
29.56759	-95.447837
29.56755	-95.448678
N/A	N/A
29.56707	-95.451233
29.56603	-95.449165

As for the "N/A" notes above, Mario sent, "We did have 6 on phase 1, this would be a meter issue, all exceedances were GPS saved in the meter but when I downloaded some of them comes up as NA, I can get with "Elkins" (manufacturer) to ask why.

This is why I also mark notes on my field book/phone, in case data gets lost."

Please let me know if you have any questions.

Thank you,

Burgess Stengl
Environmental Manager

USPS: P.O. Box 879, Fresno, TX 77545
Overnight Pkgs: 2200 FM 521, Fresno, TX 77545

o 713-676-7669 c 713-851-0506
f 713-676-7882 w www.RepublicServices.com



We'll handle it from here."

Investigation Type: FIAIRMON
Air Account NO: FG-0536-E
Attachment: 2
Page: 2 of 2

ATTACHMENT 3

May 29, 2018: Email Coordinates

4 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

Samuel Cortez

From: Stengl, Burgess [REDACTED]
Sent: Tuesday, May 29, 2018 11:54 AM
To: Samuel Cortez; Seely, Chance
Cc: Montagna, Matthew; Trebus, Scott; Meadows, Mark; Markuten, Christi
Subject: RE: Blue Ridge Landfill SEM

Mr. Cortez, as requested, below is the coordinate information for the exceedances detected at the Blue Ridge Landfill during the 2018 second quarter surface emission monitoring event.

Phase 3 (32 locations)

Investigation Type: FIAIR MON
Air Account NO: FG-0536-E
Attachment: 3
Page: 1 of 4

LAT WGS8 LON WGS8

29.56865 -95.4474
29.56637 -95.4535
29.56543 -95.4535
29.5651 -95.4521
29.56503 -95.4515
29.565 -95.4514
29.56498 -95.4512
29.56469 -95.449
29.56467 -95.4489
29.5643 -95.4441
29.56532 -95.4424
29.56814 -95.4458
29.5683 -95.4479
29.56735 -95.4515
29.56595 -95.4526
29.56584 -95.4513
29.56586 -95.4507
29.56592 -95.4503
29.56571 -95.449
29.56541 -95.4475
29.5667 -95.4463
29.56754 -95.446
29.56754 -95.4465
29.56766 -95.4469
29.56772 -95.447
29.5676 -95.4472
29.56757 -95.4471
29.5676 -95.4478
29.56756 -95.4487
29.5675 -95.449
29.56709 -95.4512
29.56605 -95.4492

Phase 1 (6 locations)

Investigation Type: FLAIRMON

Air Account NO: FG-0536-E

Attachment: 3

Page: 2 of 4

LAT WGS8 LON WGS8

29.5576 -95.4511
29.55502 -95.4458
29.55504 -95.4485
29.55877 -95.4494
29.5583 -95.4499
29.55617 -95.445

Please let us know if you have any questions.

Thank you,

Burgess Stengl
Environmental Manager

USPS: P.O. Box 879, Fresno, TX 77545
Overnight Pkgs: 2200 FM 521, Fresno, TX 77545
e [REDACTED]
o 713-676-7669 c 713-851-0506
f 713-676-7882 w www.RepublicServices.com



We'll handle it from here

From: Samuel Cortez [mailto:samuel.cortez@tceq.texas.gov]
Sent: Thursday, May 24, 2018 5:02 PM
To: Seely, Chance
Cc: Stengl, Burgess; Montagna, Matthew; Trebus, Scott
Subject: RE: Blue Ridge Landfill SEM

Mr. Seely,

We will be returning to the Blue Ridge Landfill on Wednesday, May 30, 2018. We will continue our assessment of the corrective actions taken during the course of all monitoring conducted since April 30, 2018. Please provide a list of second attempt corrective action details for the points of concern noted by AEG during quarterly monitoring conducted from April 30, 2018 through May 4, 2018. Thank you again for your time and cooperation. Please let me know if you have any questions or concerns and have a great weekend.

Samuel Cortez
Senior Environmental Investigator V

Investigation Type: FLAIR MON
Air Account NO: FG-0536-E
Attachment: 3
Page: 3 of 4

Texas Commission on Environmental Quality
Air Section, Region 12 Office
5425 Polk Street, Suite H
Houston, Texas 77023
Office: (713) 767-3723
Fax: (713) 767-3761
Email: samuel.cortez@tceq.texas.gov

From: Seely, Chance [mailto: [REDACTED]]
Sent: Friday, May 18, 2018 3:59 PM
To: Samuel Cortez <samuel.cortez@tceq.texas.gov>
Cc: Stengl, Burgess [REDACTED]; Montagna, Matthew [REDACTED]
Trebus, Scott [REDACTED]
Subject: Blue Ridge Landfill SEM

Mr.Cortez,

As we discussed in this morning's safety meeting please make sure that all of the personnel that will be conducting the SEM event here at Blue Ridge, have the following PPE requirements:

- Steel Toe Boots
- Reflective Safety Vests
- Hard Hats

Additionally, we ask that TCEQ provides an adequate supply of water for the continuation of monitoring next week, we can place any coolers in the Kubotas for your convenience.

Have a great weekend!

Thank you,
Chance Seely

Chance Seely, G.I.T
Environmental Specialist

USPS: P.O. Box 879, Fresno, TX 77545
Overnight Pkgs: 2200 FM 521, Fresno, TX 77545
e [REDACTED]
c 832-835-8839
f 713-676-7882 w www.RepublicServices.com



We'll handle it from here.

[REDACTED]

Investigation Type: FLAIRMON
Air Account NO: FG - 0536 - E
Attachment: 3
Page: 4 of 4

ATTACHMENT 4

Participation Rosters

6 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

Participation Rosters

4/30/2018 (9:15 AM - 4:30 PM)	Affiliation
Samuel Cortez	TCEQ
Seth Tate	TCEQ
Yayma Martinez	TCEQ
Richard Blackney	TCEQ
Chance Seely	Republic Services
Mario Nunez	Tetra Tech

5/1/2018 (9:00 AM - 4:00 PM)	Affiliation
Samuel Cortez	TCEQ
Seth Tate	TCEQ
Yayma Martinez	TCEQ
Richard Blackney	TCEQ
Chance Seely	Republic Services
Mario Nunez	Tetra Tech

5/2/2018 (9:00 AM - 4:00 PM)	Affiliation
Samuel Cortez	TCEQ
Seth Tate	TCEQ
William Austin Jorn	TCEQ
Richard Blackney	TCEQ
Chance Seely	Republic Services
Mario Nunez	Tetra Tech

Investigation Type: FLAERIMON
 Air Account NO: FG-0536-E
 Attachment: 4
 Page: 1 of 4

5/3/2018 (9:00 AM - 4:00 PM)	Affiliation
Samuel Cortez	TCEQ
William Austin Jorn	TCEQ
Andrew Jay Evans	TCEQ
Richard Blackney	TCEQ
Chance Seely	Republic Services
Mario Nunez	Tetra Tech

5/4/2018 (9:00 AM - 4:00 PM)	Affiliation
Samuel Cortez	TCEQ
Hasanain Alameen	TCEQ
Daniel Villarreal	TCEQ
Richard Blackney	TCEQ
Josh Mefford	TCEQ
Chance Seely	Republic Services
Mario Nunez	Tetra Tech

5/14/2018 (9:45 AM - 3:00 PM)	Affiliation
Samuel Cortez	TCEQ
William Austin Jorn	TCEQ
Seth Tate	TCEQ
Hasanain Alameen	TCEQ
Josh Mefford	TCEQ
Danielle Woods	TCEQ
Chance Seely	Republic Services
Christi Markuten	Tetra Tech

Investigation Type: FIAIRMOH
Air Account NO: FG-0536-E
Attachment: 4
Page: 2 of 6

5/15/2018 (7:45 AM - 3:00 PM)	Affiliation
William Austin Jorn	TCEQ
Anallely Salinas	TCEQ
Hasanain Alameen	TCEQ
Josh Mefford	TCEQ
Danielle Woods	TCEQ
David Broussard	TCEQ
Chance Seely	Republic Services
Christi Markuten	Tetra Tech

5/16/2018 (7:15 AM - 3:00 PM)	Affiliation
William Austin Jorn	TCEQ
Anallely Salinas	TCEQ
Hasanain Alameen	TCEQ
Josh Mefford	TCEQ
Danielle Woods	TCEQ
David Broussard	TCEQ
Chance Seely	Republic Services
Christi Markuten	Tetra Tech

5/17/2018 (7:00 AM - 12:00 PM)	Affiliation
William Austin Jorn	TCEQ
Anallely Salinas	TCEQ
Andrew Jay Evans	TCEQ
Josh Mefford	TCEQ
Danielle Woods	TCEQ
David Broussard	TCEQ
Chance Seely	Republic Services
Christi Markuten	Tetra Tech

Investigation Type: FAIRMON
 Air Account NO: FL-0536-E
 Attachment: 4
 Page: 3 of 6

5/18/2018 (7:00 AM - 12:00 PM)		Affiliation
Samuel Cortez		TCEQ
William Austin Jorn		TCEQ
Seth Tate		TCEQ
Josh Mefford		TCEQ
David Broussard		TCEQ
Chance Seely		Republic Services
Christl Markuten		Tetra Tech

5/21/2018 (7:45 Am - 1:00 PM)		Affiliation
Samuel Cortez		TCEQ
Andrew Jay Evans		TCEQ
Yayma Martinez		TCEQ
Dominique Henson		TCEQ
Christopher Norgbey		TCEQ
Chance Seely		Republic Services
Christl Markuten		Tetra Tech

5/22/2018 (7:00 AM - 12:30 PM)		Affiliation
Seth Tate		TCEQ
Nicole Foster		TCEQ
Bianca Lopez		TCEQ
Danielle Woods		TCEQ
Daniel Villarreal		TCEQ
Christiphor Norgbey		TCEQ
Chance Seely		Republic Services
Christl Markuten		Tetra Tech

Investigation Type: FLAIRMOM
Air Account NO: F6-0596-E
Attachment: 4
Page: 4 of 6

5/23/2018 (7:45 AM - 1:00 PM)	Affiliation
Samuel Cortez	TCEQ
Blanca Lopez	TCEQ
Christopher Norgbey	TCEQ
Danielle Woods	TCEQ
Leann Kincaid	TCEQ
Gabrielle Lamoreaux	TCEQ
Chance Seely	Republic Services
Christi Markuten	Tetra Tech

5/24/2018 (7:45 AM - 3:00 PM)	Affiliation
Samuel Cortez	TCEQ
Blanca Lopez	TCEQ
Christopher Norgbey	TCEQ
Danielle Woods	TCEQ
Leann Kincaid	TCEQ
Gabrielle Lamoreaux	TCEQ
Chance Seely	Republic Services
Christi Markuten	Tetra Tech

5/30/2018 (7:50 AM - 3:30 PM)	Affiliation
Samuel Cortez	TCEQ
Daniel Villarreal	TCEQ
Chance Seely	Republic Services
Christi Markuten	Tetra Tech

Investigation Type: FEARMOVR
Air Account NO: FG-0536-E
Attachment: 4
Page: 5 of 6

6/6/2018 (7:30 AM - 3:30 PM)	Affiliation
Samuel Cortez	TCEQ
William Austin Jorn	TCEQ
David Broussard	TCEQ
Danielle Woods	TCEQ
Leann Kincaid	TCEQ
Chance Seely	Republic Services
Mario Nunez	Tetra Tech

7/6/2018 (9:00 AM - 5:15 PM)	Affiliation
Samuel Cortez	TCEQ
William Austin Jorn	TCEQ
Burgess Stengl	Republic Services
Mark Meadows	Republic Services
Amy Kubinski	Republic Services
Michael Widner	Tetra Tech
Archana Nagara	Weaver Consultants Group
Mary-Leigh Winkler	Weaver Consultants Group

Investigation Type: FZAFRMON
Air Account NO: FG-0536-E
Attachment: 4
Page: 6 of 6

ATTACHMENT 5

July 2, 2018: NSPS Report Excerpts

69 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

JULY 2018
SEMI-ANNUAL NSPS REPORT / TITLE V DEVIATION AND
MONITORING REPORT / SSM REPORT

BLUE RIDGE LANDFILL
FORT BEND COUNTY, TEXAS
RN 102610102 CN 602820599

Prepared for
Blue Ridge Landfill TX, LP
July 2018

Prepared by
Weaver Consultants Group, LLC
6420 Southwest Boulevard, Suite 206
Fort Worth, Texas 76109
817-735-9770

Project No. 0120-405-50-43

Investigation Type: FIAIRMON
Air Account No.: FG-0536-E
Attachment: 5
Page: 1 of 69



July 2, 2018
Project #: 0120-405-50-43

Mr. Joseph Doby
Air Section Manager
TCEQ – Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

Re: July 2018 Semi-Annual NSPS Report / Title V Deviation and
Monitoring Report / SSM Report
Blue Ridge Landfill – Fort Bend County, Texas
TCEQ Account No. FG-0536-E, GOP No. O-01472
CN 602820599 RN 102610102

Dear Mr. Doby:

Pursuant to Title 40 Code of Federal Regulations (CFR) §60.757, §63.10(d)(5)(i), Title 30 Texas Administrative Code (TAC) §122.145 and 30 TAC §122.146 and on behalf of Blue Ridge Landfill TX, LP, please find enclosed two copies of the July 2018 Semi-Annual New Source Performance Standards (NSPS) Report / Title V Deviation and Monitoring Report / Startup, Shutdown and Malfunction (SSM) Report for the Blue Ridge Landfill located in Fort Bend County, Texas. The reporting period for these reports covers the six-month period from December 5, 2017 through June 4, 2018. The TCEQ issued the facility's Title V permit on December 4, 2000. The GOP Authorization to Operate was renewed by TCEQ on March 3, 2016.

If you have any questions or comments regarding this submittal, please call.

Sincerely,
Weaver Consultants Group, LLC

Handwritten signature of Mary-Leigh Winkler.

Mary-Leigh Winkler
Environmental Scientist

Handwritten signature of Angie S. Vandergriff.
for: Angie S. Vandergriff
Senior Project Manager

Attachment: July 2018 Semi-Annual NSPS Report / Title V Deviation and Monitoring
Report / SSM Report (2 copies)

cc: EPA Region 6 Compliance Assurance and Enforcement Division (Title V Deviation
and Monitoring Report)
Scott Trebus P.E., Blue Ridge Landfill TX, LP (electronic)
Burgess Stengl, Blue Ridge Landfill TX, LP (electronic)
Matthew Montagna, Blue Ridge Landfill TX, LP

CONTENTS

1	INTRODUCTION	1
2	NSPS REPORTING REQUIREMENTS	2
	§60.757(f)	2
	§60.757(f)(1)	2
	§60.757(f)(2)	5
	§60.757(f)(3)	6
	§60.757(f)(4)	6
	§60.757(f)(5)	6
	§60.757(f)(6)	6
	§60.758(c)(1)(i)	7
3	NESHAP MACT REQUIREMENTS	8
	§63.1960	8
	§63.1965(a)	8
	§63.1965(b)	9

APPENDIX A

Monthly Wellhead Monitoring Data

APPENDIX B

Quarterly Surface Emissions Monitoring Report by Tetra Tech

APPENDIX C

GCCS Expansion

APPENDIX D

Semi-Annual Deviation and Monitoring Report
(Includes Title V Forms: PCC, DevRep, and OP-CRO1)

APPENDIX E

Startup, Shutdown, and Malfunction Report



Blue Ridge Landfill

Fresno, Texas

Surface Emissions Monitoring

2nd Quarter Report 2018

Prepared By:



TETRA TECH

Tetra Tech
3600 Brecksville Road
Richfield, Ohio 44286
(330) 659-5930

Investigation Type: FI/IRMON
Air Account No.: FG-0536-E
Attachment: 5
Page: 4 of 69



June 12, 2018

Mr. Burgess Stengl
District Environmental Manager
Republic Services, Inc.
5757A Oates Road
Houston, TX 77078

RE: NSPS Surface Emissions Monitoring at Blue Ridge Landfill – 2nd Quarter 2018

Dear Mr. Stengl,

Tetra Tech prepared the enclosed report documenting the results of the 2nd Quarter 2018 NSPS surface scan at Blue Ridge Landfill. The initial monitoring event was performed on May 1, May 2, May 3, and May 4, 2018. Thirty-eight (38) exceedances of the 500 parts per million methane by volume (ppm) standard were noted at the facility during the initial scan event.

The 10 day rechecks were performed on May 9, 2018. All of the 38 exceedance areas indicated readings below the 500 ppm standard.

The 30 day recheck monitoring was performed on May 24, 2018. Monitoring of the Thirty-eight exceedance locations again indicated all readings were less than the 500 ppm standard.

In summary, 38 of 38 exceedance areas passed the 2nd Quarter 2018 surface scan event. Field monitoring forms are attached for your files.

Weather Conditions

Weather condition recorded during the monitoring event was as follows:

May 1, 2018

- Temperature approximately 72° Fahrenheit
- Relative humidity of 87 percent
- Barometric pressure of 30.02"Hg
- Wind SE at 6 mph
- Overcast skies

May 2, 2018

- Temperature approximately 78° Fahrenheit
- Relative humidity of 83 percent
- Barometric pressure of 30.04"Hg
- Wind SSE at 8 mph
- Overcast skies

May 3, 2018

- Temperature approximately 78° Fahrenheit
- Relative humidity of 82 percent
- Barometric pressure of 30.03"Hg
- Wind SSE at 9 mph
- Overcast skies

May 4, 2018

- Temperature approximately 74° Fahrenheit
- Relative humidity of 87 percent
- Barometric pressure of 30.07"Hg
- Wind SE at 5 mph
- Overcast skies

May 9, 2018

- Temperature approximately 72° Fahrenheit
- Relative humidity of 70 percent
- Barometric pressure of 30.04"Hg
- Wind S at 2 mph
- Clear skies

May 24, 2018

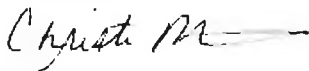
- Temperature approximately 78° Fahrenheit
- Relative humidity of 85 percent
- Barometric pressure of 30.04"Hg
- Wind ESE at 2 mph
- Scattered clouds skies

In accordance with NSPS regulations, this monitoring event was performed during typical meteorological conditions.

The survey was conducted in accordance with the regulations set forth in the New Source Performance Standard (NSPS), 40 CFR 60.755 (c) and (d); (2) 40 CFR 60, 40 CFR 60.753(d) - Surface Scan Requirements, Appendix A – Method 21. A Thermo Scientific (MicroFID) flame ionization detector (FID) was used to perform the emissions monitoring. The FID was calibrated at the beginning of each day, prior to performing the monitoring, in accordance with Method 21 compliance requirements. The calibration log was completed by the field technician performing the work, and is included in Attachment: Daily Calibration Log. Results are presented in the attached forms.

Please forward any questions regarding this report, attachments, or data to Christi Markuten at (330) 352-9620.

Sincerely,



O&M South Region Project Manager

Attachment: Daily Calibration Logs
Attachment: Daily Surface Monitoring Logs
Attachment: Calibration Gas Certificate of Analysis
Attachment: Site Drawing



Blue Ridge Landfill

Fresno, Texas

Daily Calibration Logs

CALIBRATION PRECISION TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:44 DATE: May 1, 2018

Calibration Gas Standard: 500ppm CH₄

MEASUREMENT # 1:

Meter Reading for Zero Air: 0.0 ppm (1)

Meter Reading for Calibration Gas: 486.1 ppm (2)

MEASUREMENT # 2:

Meter Reading for Zero Air: 0.0 ppm (3)

Meter Reading for Calibration Gas: 486.0 ppm (4)

MEASUREMENT # 3:

Meter Reading for Zero Air: 0.0 ppm (5)

Meter Reading for Calibration Gas: 490.0 ppm (6)

CALCULATE PRECISION:

Must be less than 10%

$$\frac{|500 - (2)| + |500 - (4)| + |500 - (6)|}{3} \times \frac{1}{500} \times \frac{100}{1} = \underline{2.527\%}$$

INSTRUMENT RESPONSE TIME TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:46 DATE: May 1, 2018

MEASUREMENT # 1:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 5.0 seconds (1)

MEASUREMENT # 2:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 4.0 seconds (2)

MEASUREMENT # 3:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 6.0 seconds (3)

CALCULATE RESPONSE TIME:

Must be less than 30 seconds $\frac{(1) + (2) + (3)}{3} = \underline{5.000}$ seconds

CALIBRATION PROCEDURE & BACKGROUND DETERMINATION REPORT

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:52 DATE: May 1, 2018

CALIBRATION PROCEDURE

1. Allow instrument to internally zero itself while introducing zero air.

2. Introduce the calibration gas into the probe.

Stable Reading = 492.0

3. Adjust meter to read 500 ppm.

BACKGROUND DETERMINATION PROCEDURE

1. Upwind Reading (highest in 30 seconds):

Location: South of phase 1 by scale house 1.5 ppm (1)

2. Downwind Reading (highest in 30 seconds):

Location: North of phase 1 1.3 ppm (2)

CALCULATE BACKGROUND VALUE

$$\frac{(1) + (2)}{2} = \underline{1.4} \text{ ppm}$$

CALIBRATION PRECISION TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:27 DATE: May 2, 2018

Calibration Gas Standard: 500ppm CH₄

MEASUREMENT # 1:

Meter Reading for Zero Air: 0.0 ppm (1)

Meter Reading for Calibration Gas: 494.0 ppm (2)

MEASUREMENT # 2:

Meter Reading for Zero Air: 0.0 ppm (3)

Meter Reading for Calibration Gas: 494.8 ppm (4)

MEASUREMENT # 3:

Meter Reading for Zero Air: 0.0 ppm (5)

Meter Reading for Calibration Gas: 497.3 ppm (6)

CALCULATE PRECISION:

Must be less than 10%

$$\frac{|500 - (2)| + |500 - (4)| + |500 - (6)|}{3} \times \frac{1}{500} \times \frac{100}{1} = \underline{0.927\%}$$

INSTRUMENT RESPONSE TIME TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:28 DATE: May 2, 2018

MEASUREMENT # 1:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 3.0 seconds (1)

MEASUREMENT # 2:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 6.0 seconds (2)

MEASUREMENT # 3:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 5.0 seconds (3)

CALCULATE RESPONSE TIME:

Must be less than 30 seconds
$$\frac{(1) + (2) + (3)}{3} = \underline{4.667} \text{ seconds}$$

CALIBRATION PROCEDURE & BACKGROUND DETERMINATION REPORT

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:30 DATE: May 2, 2018

CALIBRATION PROCEDURE

1. Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading = 494.0
3. Adjust meter to read 500 ppm.

BACKGROUND DETERMINATION PROCEDURE

1. Upwind Reading (highest in 30 seconds):

Location: South of phase 1 by scale house 1.5 ppm (1)

2. Downwind Reading (highest in 30 seconds):

Location: North of phase 1 1.3 ppm (2)

CALCULATE BACKGROUND VALUE

$$\frac{(1) + (2)}{2} = \underline{1.4} \text{ ppm}$$

CALIBRATION PRECISION TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:11 DATE: May 3, 2018

Calibration Gas Standard: 500ppm CH₄

MEASUREMENT # 1:

Meter Reading for Zero Air: 0.0 ppm (1)

Meter Reading for Calibration Gas: 498.0 ppm (2)

MEASUREMENT # 2:

Meter Reading for Zero Air: 0.0 ppm (3)

Meter Reading for Calibration Gas: 492.0 ppm (4)

MEASUREMENT # 3:

Meter Reading for Zero Air: 0.0 ppm (5)

Meter Reading for Calibration Gas: 499.0 ppm (6)

CALCULATE PRECISION:

Must be less than 10%

$$\frac{|500 - (2)| + |500 - (4)| + |500 - (6)|}{3} \times \frac{1}{500} \times \frac{100}{1} = \underline{0.733\%}$$

INSTRUMENT RESPONSE TIME TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:14 DATE: May 3, 2018

MEASUREMENT # 1:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 5.0 seconds (1)

MEASUREMENT # 2:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 4.0 seconds (2)

MEASUREMENT # 3:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 5.0 seconds (3)

CALCULATE RESPONSE TIME:

Must be less than 30 seconds

$$\frac{(1) + (2) + (3)}{3} = \underline{4.667} \text{ seconds}$$

CALIBRATION PROCEDURE & BACKGROUND DETERMINATION REPORT

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:30 DATE: May 3, 2018

CALIBRATION PROCEDURE

1. Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading = 496.0
3. Adjust meter to read 500 ppm.

BACKGROUND DETERMINATION PROCEDURE

1. Upwind Reading (highest in 30 seconds):
Location: South of phase 1 by scale house 1.8 ppm (1)
2. Downwind Reading (highest in 30 seconds):
Location: North of phase 3 by access road 1.1 ppm (2)

CALCULATE BACKGROUND VALUE

$$\frac{(1) + (2)}{2} = \underline{1.5} \text{ ppm}$$

CALIBRATION PRECISION TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:38 DATE: May 4, 2018

Calibration Gas Standard: 500ppm CH₄

MEASUREMENT # 1:

Meter Reading for Zero Air: 0.0 ppm (1)

Meter Reading for Calibration Gas: 496.9 ppm (2)

MEASUREMENT # 2:

Meter Reading for Zero Air: 0.0 ppm (3)

Meter Reading for Calibration Gas: 496.2 ppm (4)

MEASUREMENT # 3:

Meter Reading for Zero Air: 0.0 ppm (5)

Meter Reading for Calibration Gas: 496.2 ppm (6)

CALCULATE PRECISION:

Must be less than 10%

$$\frac{|500 - (2)| + |500 - (4)| + |500 - (6)|}{3} \times \frac{1}{500} \times \frac{100}{1} = \underline{0.713\%}$$

INSTRUMENT RESPONSE TIME TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:39 DATE: May 4, 2018

MEASUREMENT # 1:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 10.0 seconds (1)

MEASUREMENT # 2:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 7.0 seconds (2)

MEASUREMENT # 3:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 9.0 seconds (3)

CALCULATE RESPONSE TIME:

Must be less than 30 seconds
$$\frac{(1) + (2) + (3)}{3} = \underline{8.667} \text{ seconds}$$

CALIBRATION PROCEDURE & BACKGROUND DETERMINATION REPORT

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 8:42 DATE: May 4, 2018

CALIBRATION PROCEDURE

1. Allow instrument to internally zero itself while introducing zero air.

2. Introduce the calibration gas into the probe.

Stable Reading = 498.0

3. Adjust meter to read 500 ppm.

BACKGROUND DETERMINATION PROCEDURE

1. Upwind Reading (highest in 30 seconds):

Location: South of phase 1 by scale house 1.3 ppm (1)

2. Downwind Reading (highest in 30 seconds):

Location: North of phase 3 by access road 1.9 ppm (2)

CALCULATE BACKGROUND VALUE

$$\frac{(1) + (2)}{2} = \underline{1.6} \text{ ppm}$$

CALIBRATION PRECISION TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter 10 day rechecks

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 9:22 DATE: May 9, 2018

Calibration Gas Standard: 500ppm CH₄

MEASUREMENT # 1:

Meter Reading for Zero Air: 0.0 ppm (1)

Meter Reading for Calibration Gas: 499.0 ppm (2)

MEASUREMENT # 2:

Meter Reading for Zero Air: 0.0 ppm (3)

Meter Reading for Calibration Gas: 494.5 ppm (4)

MEASUREMENT # 3:

Meter Reading for Zero Air: 0.0 ppm (5)

Meter Reading for Calibration Gas: 499.0 ppm (6)

CALCULATE PRECISION:

Must be less than 10%

$$\frac{|500 - (2)| + |500 - (4)| + |500 - (6)|}{3} \times \frac{1}{500} \times \frac{100}{1} = \underline{0.500\%}$$

INSTRUMENT RESPONSE TIME TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter 10 day rechecks

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 9:26 DATE: May 9, 2018

MEASUREMENT # 1:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 6.0 seconds (1)

MEASUREMENT # 2:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 6.0 seconds (2)

MEASUREMENT # 3:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 5.0 seconds (3)

CALCULATE RESPONSE TIME:

Must be less than 30 seconds $\frac{(1) + (2) + (3)}{3} = \underline{5.667}$ seconds

CALIBRATION PROCEDURE & BACKGROUND DETERMINATION REPORT

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter 10 day rechecks
INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305
PERFORMED BY: Mario Nunez TIME: 9:42 DATE: May 9, 2018

CALIBRATION PROCEDURE

1. Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading = 498.0
3. Adjust meter to read 500 ppm.

BACKGROUND DETERMINATION PROCEDURE

1. Upwind Reading (highest in 30 seconds):
Location: South of phase 1 by scale house 1.3 ppm (1)
2. Downwind Reading (highest in 30 seconds):
Location: North of phase 3 by access road 1.9 ppm (2)

CALCULATE BACKGROUND VALUE

$$\frac{(1) + (2)}{2} = \underline{1.6} \text{ ppm}$$

CALIBRATION PRECISION TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter 30 day rechecks

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 9:05 DATE: May 24, 2018

Calibration Gas Standard: 500ppm CH₄

MEASUREMENT # 1:

Meter Reading for Zero Air: 0.0 ppm (1)

Meter Reading for Calibration Gas: 498.3 ppm (2)

MEASUREMENT # 2:

Meter Reading for Zero Air: 0.0 ppm (3)

Meter Reading for Calibration Gas: 500.0 ppm (4)

MEASUREMENT # 3:

Meter Reading for Zero Air: 0.0 ppm (5)

Meter Reading for Calibration Gas: 501.1 ppm (6)

CALCULATE PRECISION:

Must be less than 10%

$$\frac{|500 - (2)| + |500 - (4)| + |500 - (6)|}{3} \times \frac{1}{500} \times \frac{100}{1} = \underline{0.187\%}$$

INSTRUMENT RESPONSE TIME TEST RECORD

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter 30 day rechecks
INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305
PERFORMED BY: Mario Nunez TIME: 9:08 DATE: May 24, 2018

MEASUREMENT # 1:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 6.0 seconds (1)

MEASUREMENT # 2:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 6.0 seconds (2)

MEASUREMENT # 3:

Stabilized Reading Using Calibration Gas: 500.0 ppm
90% of the Stabilized Reading: 450.0 ppm
Time to Reach 90% of Stabilized reading after switching
from Zero Air to Calibration Gas: 5.0 seconds (3)

CALCULATE RESPONSE TIME:

Must be less than 30 seconds
$$\frac{(1) + (2) + (3)}{3} = \underline{5.667} \text{ seconds}$$

CALIBRATION PROCEDURE & BACKGROUND DETERMINATION REPORT

Initial Event: May 1, 2018

LANDFILL NAME: Blue Ridge EVENT: 2nd Quarter 30 day rechecks

INSTRUMENT MAKE: Trimble (GPS) MODEL: SiteFID SERIAL #: TLCF0305

PERFORMED BY: Mario Nunez TIME: 9:12 DATE: May 24, 2018

CALIBRATION PROCEDURE

1. Allow instrument to internally zero itself while introducing zero air.
2. Introduce the calibration gas into the probe.
Stable Reading = 498.0
3. Adjust meter to read 500 ppm.

BACKGROUND DETERMINATION PROCEDURE

1. Upwind Reading (highest in 30 seconds):
Location: South of phase 1 by scale house 1.1 ppm (1)
2. Downwind Reading (highest in 30 seconds):
Location: North of phase 3 by access road 1.4 ppm (2)

CALCULATE BACKGROUND VALUE

$$\frac{(1) + (2)}{2} = \underline{1.3} \text{ ppm}$$



Blue Ridge Landfill

Fresno, Texas

Daily Surface Monitoring Logs

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 1

Date: <u>5/1/2018</u>	Time: <u>10:06</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>2683</u> ppm - <u>5</u> ppm = <u>2678</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>LCR leachate riser north of phase 1</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Refoam and increase vacuum around LCRS</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 10:32 Monitoring Technician Initials: MN
Instrument reading - Background reading: 161.2 ppm - 1 ppm = 160.2 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 10:11 Monitoring Technician Initials: MN
Instrument reading - Background reading: 192 ppm - 1 ppm = 191 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 2

Date: <u>5/1/2018</u>	Time: <u>14:03</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>1962</u> ppm - <u>7</u> ppm = <u>1955</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>Access riser south of CS1-8</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Increase vacuum on LCR and refoam</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 10:35 Monitoring Technician Initials: MN
Instrument reading - Background reading: 17.9 ppm - 1 ppm = 16.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 10:15 Monitoring Technician Initials: MN
Instrument reading - Background reading: 155 ppm - 1 ppm = 154 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 3

Date: <u>5/1/2018</u>	Time: <u>15:58</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>5509</u> ppm - <u>1</u> ppm = <u>5508</u> ppm			
Location of monitored exceedance (include description of field marker used): <u>South west of phase 1 by sign marker</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>			

Remonitor location within 10 calendar days of Initial Exceedance:			
Date: <u>5/9/2018</u>	Time: <u>10:54</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>45.5</u> ppm - <u>1</u> ppm = <u>44.5</u> ppm			
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____			
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: <u>5/24/2018</u>	Time: <u>10:21</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>102</u> ppm - <u>1</u> ppm = <u>101</u> ppm			
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____			

Remonitor location within 10 calendar days of 2nd Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____			

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FIAIRMON
Air Account No.: FG-0536-E
Attachment: 5
Page: 29 of 69

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 4

Date: <u>5/2/2018</u>	Time: <u>9:49</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>5874</u> ppm - <u>1.1</u> ppm = <u>5872.9</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South west of phase 1 marked with red flag</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>10:48</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>218</u> ppm - <u>1</u> ppm = <u>217</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>10:26</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>31</u> ppm - <u>1</u> ppm = <u>30</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 5

Date: <u>5/2/2018</u>	Time: <u>10:01</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>1580</u> ppm - <u>1</u> ppm = <u>1579</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South west of phase 1 near header valve marked with red flag.</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 10:51 Monitoring Technician Initials: MN
Instrument reading - Background reading: 3 ppm - 1 ppm = 2 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 10:29 Monitoring Technician Initials: MN
Instrument reading - Background reading: 89 ppm - 1 ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FAIRMON

Use a separate form for each initial exceedance.

Air Account No.: FG-0536-E

Attachment: 5

Page: 31 of 69

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 6

Date: <u>5/2/2018</u>	Time: <u>11:14</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>802</u> ppm - <u>1.4</u> ppm = <u>800.6</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South East of phase 1 by liner</u>		
Marked with red flag		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>10:55</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>211</u> ppm - <u>1</u> ppm = <u>210</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>10:33</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>177</u> ppm - <u>1</u> ppm = <u>176</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 7

Date: <u>5/3/2018</u>	Time: <u>9:29</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>534.4</u> ppm - <u>1.2</u> ppm = <u>533.2</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>North side of phase 3</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 11:21 Monitoring Technician Initials: MN
Instrument reading - Background reading: 10.7 ppm - 1 ppm = 9.7 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 10:45 Monitoring Technician Initials: MN
Instrument reading - Background reading: 87 ppm - 1 ppm = 86 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 8

Date: <u>5/3/2018</u>	Time: <u>9:54</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>790</u> ppm - <u>1.2</u> ppm = <u>788.8</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>North East side of phase 3</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>11:23</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>40</u> ppm - <u>2</u> ppm = <u>38</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>10:52</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>52</u> ppm - <u>1</u> ppm = <u>51</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 9

Date: <u>5/3/2018</u>	Time: <u>10:05</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>1092</u> ppm - <u>1.1</u> ppm = <u>1090.9</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW385 Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>11:25</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>41</u> ppm - <u>0</u> ppm = <u>41</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>10:57</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>56</u> ppm - <u>1</u> ppm = <u>55</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 10

Date: <u>5/3/2018</u>	Time: <u>10:20</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>816.2</u> ppm - <u>1.3</u> ppm = <u>814.9</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South of phase 3 by sign marker N</u>		
Marked with red flag		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 11:26 Monitoring Technician Initials: MN
Instrument reading - Background reading: 11.3 ppm - 1 ppm = 10.3 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 11:03 Monitoring Technician Initials: MN
Instrument reading - Background reading: 98 ppm - 1 ppm = 97 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 11

Date: <u>5/3/2018</u>	Time: <u>10:29</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>1316</u> ppm - <u>1.3</u> ppm = <u>1314.7</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South phase 3 by sign marker O</u>		
Marked with red flag		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 11:27 Monitoring Technician Initials: MN
 Instrument reading - Background reading: 231 ppm - 1.3 ppm = 229.7 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 11:05 Monitoring Technician Initials: MN
 Instrument reading - Background reading: 198 ppm - 1 ppm = 197 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
 Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
 Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
 The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
 Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 12

Date: <u>5/3/2018</u>	Time: <u>10:35</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>4311</u> ppm - <u>1.1</u> ppm = <u>4309.9</u> ppm			
Location of monitored exceedance (include description of field marker used): <u>South of phase 3, by sign marker P.</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>			

Remonitor location within 10 calendar days of Initial Exceedance:

Date: <u>5/9/2018</u>	Time: <u>11:28</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>117.3</u> ppm - <u>1</u> ppm = <u>116.3</u> ppm			

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: <u>5/24/2018</u>	Time: <u>11:09</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>182</u> ppm - <u>1</u> ppm = <u>181</u> ppm			

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

Investigator Type: FIAIRMON

Air Account No.: FG-0536-E

Attachment: 5

Page: 38 of 69

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 13

Date: <u>5/3/2018</u>	Time: <u>10:40</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>2668</u> ppm - <u>1.3</u> ppm = <u>2666.7</u> ppm			
Location of monitored exceedance (include description of field marker used): <u>South of phase 3 by sign marker P</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Granular seal cover added.</u>			

Remonitor location within 10 calendar days of Initial Exceedance:			
Date: <u>5/9/2018</u>	Time: <u>11:31</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>23</u> ppm - <u>0</u> ppm = <u>23</u> ppm			
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:			
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: <u>5/24/2018</u>	Time: <u>11:14</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>111</u> ppm - <u>1</u> ppm = <u>110</u> ppm			
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:			

Remonitor location within 10 calendar days of 2nd Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:			

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FAIRMON
Air Account No.: FG-0536-E

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 14

Date: <u>5/3/2018</u>	Time: <u>12:51</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>2668</u> ppm - <u>1.1</u> ppm = <u>2666.9</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South of phase 3 by sign marker X</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Granular seal cover added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 11:33 Monitoring Technician Initials: MN
Instrument reading - Background reading: 11 ppm - 1 ppm = 10 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 11:17 Monitoring Technician Initials: MN
Instrument reading - Background reading: 98 ppm - 1 ppm = 97 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 15

Date: <u>5/3/2018</u>	Time: <u>12:54</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>3044</u> ppm - <u>1.1</u> ppm		= <u>3042.9</u> ppm	
Location of monitored exceedance (include description of field marker used): <u>South of phase 3 by sign marker X</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added.</u>			

Remonitor location within 10 calendar days of Initial Exceedance:

Date: <u>5/9/2018</u>	Time: <u>11:36</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>45</u> ppm - <u>1</u> ppm		= <u>44</u> ppm	

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: <u>5/24/2018</u>	Time: <u>11:20</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>88</u> ppm - <u>1</u> ppm		= <u>87</u> ppm	

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm		= <u>0</u> ppm	

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm		= <u>0</u> ppm	

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 16

Date: <u>5/3/2018</u>	Time: <u>13:27</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>1307</u> ppm - <u>1.1</u> ppm		= <u>1305.9</u> ppm	
Location of monitored exceedance (include description of field marker used): <u>South of phase 3</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added</u>			

Remonitor location within 10 calendar days of Initial Exceedance:			
Date: <u>5/9/2018</u>	Time: <u>11:40</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>211</u> ppm - <u>1</u> ppm		= <u>210</u> ppm	
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:			
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: <u>5/24/2018</u>	Time: <u>11:25</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>193</u> ppm - <u>1</u> ppm		= <u>192</u> ppm	
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:			

Remonitor location within 10 calendar days of 2nd Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm		= <u>0</u> ppm	
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm		= <u>0</u> ppm	
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:			

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 17

Date: <u>5/3/2018</u>	Time: <u>14:49</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>604.7</u> ppm - <u>1.1</u> ppm = <u>603.6</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW310A penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added, increase flow</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 11:42 Monitoring Technician Initials: MN
Instrument reading - Background reading: 16 ppm - 1 ppm = 15 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 11:28 Monitoring Technician Initials: MN
Instrument reading - Background reading: 121 ppm - 1 ppm = 120 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 18

Date: <u>5/3/2018</u>	Time: <u>15:33</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>526.5</u> ppm - <u>1.2</u> ppm = <u>525.3</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW3102 Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added, increase flow.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 11:46 Monitoring Technician Initials: MN
Instrument reading - Background reading: 18 ppm - 0 ppm = 18 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 11:31 Monitoring Technician Initials: MN
Instrument reading - Background reading: 98 ppm - 1 ppm = 97 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an Individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 19

Date: <u>5/3/2018</u>	Time: <u>15:42</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>745.1</u> ppm - <u>1.2</u> ppm = <u>743.9</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>LCR3-6 penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Increased flow and cover added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: <u>5/9/2018</u>	Time: <u>11:50</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>54.7</u> ppm - <u>1.1</u> ppm = <u>53.6</u> ppm		

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: <u>5/24/2018</u>	Time: <u>11:35</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>211</u> ppm - <u>1</u> ppm = <u>210</u> ppm		

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FIAIRMON
Air Account No.: FG-0536-E

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 20

Date: <u>5/4/2018</u>	Time: <u>9:40</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>2459</u> ppm - <u>1.2</u> ppm = <u>2457.8</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>West of phase 3</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover added</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 11:52 Monitoring Technician Initials: MN
 Instrument reading - Background reading: 133 ppm - 1.1 ppm = 131.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 11:41 Monitoring Technician Initials: MN
 Instrument reading - Background reading: 152 ppm - 1 ppm = 151 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
 Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
 Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
 The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 21

Date: <u>5/4/2018</u>	Time: <u>10:02</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>504.1</u> ppm - <u>1</u> ppm = <u>503.1</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>Southwest of phase 3.</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Increase vacuum on near wells and cover added.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>11:54</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>31</u> ppm - <u>1</u> ppm = <u>30</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>11:47</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>51</u> ppm - <u>1</u> ppm = <u>50</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 22

Date: <u>5/4/2018</u>	Time: <u>10:22</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>4209</u> ppm - <u>1.1</u> ppm = <u>4207.9</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW3126 Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover and granular seal added and increase flow.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>11:59</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>105</u> ppm - <u>1</u> ppm = <u>104</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>11:50</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>152</u> ppm - <u>1</u> ppm = <u>151</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 23

Date: 5/4/2018 Time: 10:30 Monitoring Technician Initials: MN
Instrument reading - Background reading: 1366 ppm - 1.1 ppm = 1364.9 ppm
Location of monitored exceedance (include description of field marker used): EW361A Penetration

Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: Cover added and increase flow.

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:00 Monitoring Technician Initials: MN
Instrument reading - Background reading: 10 ppm - 1 ppm = 9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 11:52 Monitoring Technician Initials: MN
Instrument reading - Background reading: 31 ppm - 1 ppm = 30 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Investigation Type: FIAIRMON
Air Account No.: FG-0536-E
Attachment: 5
Page: 49 of 69

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 24

Date: <u>5/4/2018</u>	Time: <u>10:41</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>4211</u> ppm - <u>1.1</u> ppm = <u>4209.9</u> ppm			
Location of monitored exceedance (include description of field marker used): <u>EW366A Penetration</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover Added</u>			

Remonitor location within 10 calendar days of Initial Exceedance:			
Date: <u>5/9/2018</u>	Time: <u>12:01</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>10</u> ppm - <u>1</u> ppm = <u>9</u> ppm			
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:			
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: <u>5/24/2018</u>	Time: <u>11:53</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>31</u> ppm - <u>1</u> ppm = <u>30</u> ppm			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:			

Remonitor location within 10 calendar days of 2nd Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:			
Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days:			

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 25

Date: <u>5/4/2018</u>	Time: <u>10:55</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>2607</u> ppm - <u>1.3</u> ppm = <u>2605.7</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW351A Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover added and increase flow.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>12:03</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>201</u> ppm - <u>1.1</u> ppm = <u>199.9</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>11:56</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>156</u> ppm - <u>1</u> ppm = <u>155</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 26

Date: <u>5/4/2018</u>	Time: <u>11:17</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>2445</u> ppm - <u>1.3</u> ppm = <u>2443.7</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South of phase 3 by acces road.</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Cover added</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>12:05</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>191</u> ppm - <u>1.1</u> ppm = <u>189.9</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>11:59</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>89</u> ppm - <u>1</u> ppm = <u>88</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

Monitoring Type: FIAIRMON
Air Account No.: FG-0536-E
Attachment: 5
Page: 52 of 69

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 27

Date: 5/4/2018 Time: 13:50 Monitoring Technician Initials: MN
 Instrument reading - Background reading: 754 ppm - 1.3 ppm = 752.7 ppm
 Location of monitored exceedance (include description of field marker used): CS3-18 Penetration

Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: Dirt cover added

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:06 Monitoring Technician Initials: MN
 Instrument reading - Background reading: 111 ppm - 1.1 ppm = 109.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 12:03 Monitoring Technician Initials: MN
 Instrument reading - Background reading: 98 ppm - 1 ppm = 97 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
 Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
 Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
 The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 28

Date: <u>5/4/2018</u>	Time: <u>14:02</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>515.8</u> ppm - <u>1.1</u> ppm = <u>514.7</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW399 Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and increase flow</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:07 Monitoring Technician Initials: MN
Instrument reading - Background reading: 28 ppm - 1.1 ppm = 26.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 12:08 Monitoring Technician Initials: MN
Instrument reading - Background reading: 51 ppm - 1 ppm = 50 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.

Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 29

Date: <u>5/4/2018</u>	Time: <u>14:16</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>1751</u> ppm - <u>1.3</u> ppm = <u>1749.7</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW387 Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and increase flow.</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:08 Monitoring Technician Initials: MN
Instrument reading - Background reading: 21 ppm - 1.1 ppm = 19.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 12:13 Monitoring Technician Initials: MN
Instrument reading - Background reading: 98 ppm - 1 ppm = 97 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 30

Date: <u>5/4/2018</u>	Time: <u>14:22</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>1023</u> ppm - <u>1.3</u> ppm		= <u>1021.7</u> ppm	
Location of monitored exceedance (include description of field marker used): <u>West of EW387</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added</u>			

Remonitor location within 10 calendar days of Initial Exceedance:

Date: <u>5/9/2018</u>	Time: <u>12:10</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>33</u> ppm - <u>1.1</u> ppm		= <u>31.9</u> ppm	

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: <u>5/24/2018</u>	Time: <u>12:16</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>53</u> ppm - <u>1</u> ppm		= <u>52</u> ppm	

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm		= <u>0</u> ppm	

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm		= <u>0</u> ppm	

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FIAIRMON
Air Account No.: FG-0536-E

Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 31

Date: 5/4/2018 Time: 14:27 Monitoring Technician Initials: MN
Instrument reading - Background reading: 685 ppm - 1.2 ppm = 683.8 ppm
Location of monitored exceedance (include description of field marker used): South west of well EW387

Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: Dirt cover added and near wells were checked for vacuum

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:12 Monitoring Technician Initials: MN
Instrument reading - Background reading: 122 ppm - 1.1 ppm = 120.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 12:19 Monitoring Technician Initials: MN
Instrument reading - Background reading: 111 ppm - 1 ppm = 110 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 32

Date: <u>5/4/2018</u>	Time: <u>14:32</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>593.5</u> ppm - <u>1.2</u> ppm = <u>592.3</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>South west of well EW387</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and near wells were checked for vacuum</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>12:14</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>31</u> ppm - <u>1.1</u> ppm = <u>29.9</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>12:21</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>51</u> ppm - <u>1</u> ppm = <u>50</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface investigation.
Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 33

Date: <u>5/4/2018</u>	Time: <u>14:37</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>750</u> ppm - <u>1.2</u> ppm = <u>748.8</u> ppm			
Location of monitored exceedance (include description of field marker used): <u>Phase 3 north of well EW394</u>			
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and near wells were checked for vacuum</u>			

Remonitor location within 10 calendar days of Initial Exceedance:

Date: <u>5/9/2018</u>	Time: <u>12:16</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>89</u> ppm - <u>1.1</u> ppm = <u>87.9</u> ppm			

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: <u>5/24/2018</u>	Time: <u>12:23</u>	Monitoring Technician Initials: <u>MN</u>	
Instrument reading - Background reading: <u>100</u> ppm - <u>1</u> ppm = <u>99</u> ppm			

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____	Time: _____	Monitoring Technician Initials: _____	
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm			

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FIAIRMON

Use a separate form for each initial exceedance.

Air Account No.: FG-0536-E

Attachment: 5

Page: 59 of 69

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 34

Date: <u>5/4/2018</u>	Time: <u>14:54</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>3405</u> ppm - <u>1.2</u> ppm = <u>3403.8</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW394 Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and near wells were checked for vacuum</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:18 Monitoring Technician Initials: MN
Instrument reading - Background reading: 211 ppm - 1.1 ppm = 209.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 12:25 Monitoring Technician Initials: MN
Instrument reading - Background reading: 155 ppm - 1.3 ppm = 153.7 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FIAIRMON

Use a separate form for each initial exceedance.

Air Account No.: FG-0536-E

Attachment: 5

Page: 60 of 69

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 35

Date: <u>5/4/2018</u>	Time: <u>15:05</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>8110</u> ppm - <u>1.2</u> ppm = <u>8108.8</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>EW390 Penetration</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and near wells were checked for vacuum</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:21 Monitoring Technician Initials: MN
Instrument reading - Background reading: 309 ppm - 1.1 ppm = 307.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 12:27 Monitoring Technician Initials: MN
Instrument reading - Background reading: 200 ppm - 1.3 ppm = 198.7 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring type: FIAIRMON

Use a separate form for each initial exceedance.

Air Account No.: FG-0536-E

Attachment: 5

Page: 61 of 69

Individual Monitoring Exceedance Surface Monitoring Design Plan

Exceedance #: 36

Date: <u>5/4/2018</u>	Time: <u>15:10</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>574.3</u> ppm - <u>1.2</u> ppm = <u>573.1</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>North of well EW354A</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and near wells were checked for vacuum</u>		

Remonitor location within 10 calendar days of Initial Exceedance:

Date: 5/9/2018 Time: 12:23 Monitoring Technician Initials: MN
Instrument reading - Background reading: 98 ppm - 1.1 ppm = 96.9 ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____

If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: 5/24/2018 Time: 12:29 Monitoring Technician Initials: MN
Instrument reading - Background reading: 100 ppm - 1.3 ppm = 98.7 ppm

If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Remonitor location within 10 calendar days of 2nd Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:

Date: _____ Time: _____ Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = 0 ppm

If the 1 Month remonitoring is <500 ppm, resume normal monitoring.

If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.

**Individual Monitoring Exceedance
Surface Monitoring Design Plan**

Exceedance #: 37

Date: <u>5/4/2018</u>	Time: <u>15:28</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>3703</u> ppm - <u>1.2</u> ppm = <u>3701.8</u> ppm		
Location of monitored exceedance (include description of field marker used): <u>North East of well EW354A</u>		
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days: <u>Dirt cover added and near wells were checked for vacuum</u>		

Remonitor location within 10 calendar days of Initial Exceedance:		
Date: <u>5/9/2018</u>	Time: <u>12:25</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>144</u> ppm - <u>1.1</u> ppm = <u>142.9</u> ppm		
If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days: _____		
If the 10 day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: <u>5/24/2018</u>	Time: <u>12:33</u>	Monitoring Technician Initials: <u>MN</u>
Instrument reading - Background reading: <u>141</u> ppm - <u>1.1</u> ppm = <u>139.9</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal quarterly monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Remonitor location within 10 calendar days of 2nd Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 10 Day remonitoring is <500 ppm, remonitor 1 Month from Initial Exceedance:		
Date: _____	Time: _____	Monitoring Technician Initials: _____
Instrument reading - Background reading: _____ ppm - _____ ppm = <u>0</u> ppm		
If the 1 Month remonitoring is <500 ppm, resume normal monitoring.		
If the 1 Month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 Days: _____		

Use additional forms if necessary

If monitoring shows 3 Exceedances within a quarterly period, a new well or other collection device must be installed within 120 Days of the Initial Exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.
The 3 Exceedances do NOT have to be consecutive.

Use this form to record an individual monitoring exceedance and follow-up monitoring activities.

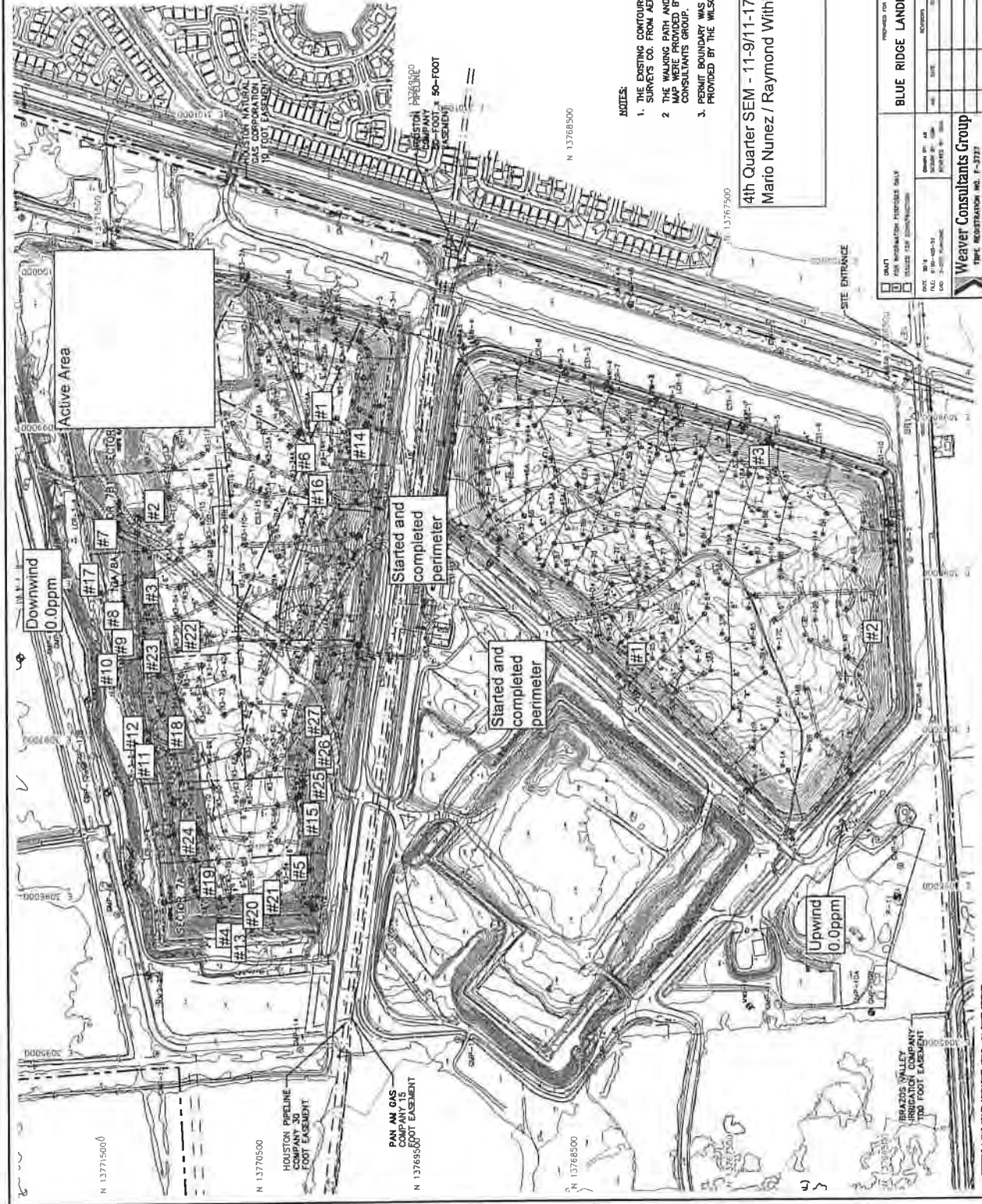
This form is only to be used when a reading of 500 ppm above background is encountered during the surface monitoring.
Use a separate form for each initial exceedance.



Blue Ridge Landfill

Fresno, Texas

Site Drawing



- LEGEND**
- PERMIT BOUNDARY
 - LIMIT OF WHITE
 - EXISTING FILL AREA
 - CELL BOUNDARY
 - STATE PLANE COORDINATE SYSTEM
 - EXISTING CONTOUR
 - EXISTING LFG MONITORING PROBE
 - EXISTING LFG EXTRACTION WELL
 - EXISTING LFG EXTRACTION WELL (WITH PUMP)
 - EXISTING REMOTE WELLHEAD
 - EXISTING CONDENSATE PUMP STATION
 - EXISTING LFG COLLECTION PIPING
 - EXISTING LFG ISOLATION VALVE
 - EXISTING CONDENSATE SUMP
 - EXISTING LGR CONNECTION
 - EXISTING HEADY ACCESS RISER
 - EXISTING HORIZONTAL COLLECTOR
 - EXISTING SOLAR FLARE LOCATION
 - EXISTING PRESSURE TAP
 - EXISTING BLIND FLANGE
 - EXISTING HOPE CAP
 - EXISTING ROAD CROSSING
 - EXISTING AIR SUPPLY LINE
 - EXISTING CONDENSATE FORCEMAIN
 - EXISTING AIR/CONDENSATE VALVE
 - EXISTING LFTE PIPING
 - LOCATION OF WALKING PATH (SEE NOTE 2)
 - PATH START/FINISH (SEE NOTE 2)

NOTES

1. THE EXISTING CONTOURS AND ELEVATIONS PROVIDED BY COOPER AERIAL SURVEYS CO. FROM AERIAL PHOTOGRAPHY FLOWN ON 11-19-2017.
2. THE WALKING PATH AND SURFACE EMISSION MONITORING INFORMATION SHOWN ON THIS MAP WERE PROVIDED BY TETRA TECH AND NOT A WORK PRODUCT OF WEAVER CONSULTANTS GROUP.
3. PERMIT BOUNDARY WAS REPRODUCED FROM LEGAL DESCRIPTION PROVIDED BY THE WILSON SURVEY GROUP DATED JANUARY 2006.

4th Quarter SEM - 11-9/11-17
Mario Nunez / Raymond Withlock

Investigation Type: FIARMON
Air Account No. FG-05356
Attachment 5
Page 65 of 69

WEAVER CONSULTANTS GROUP TIME REGISTRATION NO. F-3727		BLUE RIDGE LANDFILL TX, LP		SITE PLAN	
DATE: 11-11-17	BY: MARIO NUNEZ	DATE: 11-11-17	BY: MARIO NUNEZ	BLUE RIDGE LANDFILL FORT BEND COUNTY, TEXAS	
PROJECT: 11-11-17	CLIENT: WILSON SURVEY GROUP	PROJECT: 11-11-17	CLIENT: WILSON SURVEY GROUP	WWW.WCGP.COM	
DRAWING 1					

APPENDIX D

SEMI-ANNUAL DEVIATION AND MONITORING REPORT (TITLE V FORMS: PCC, DEVREP, and OP-CRO1)



**Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)**

Permit Holder Name	Blue Ridge Landfill TX, LP	Customer Number	CN602820599
Area Name	Blue Ridge Landfill	Account Number	FG-0536-E
Operating Permit Number	O - 01472	Report Submittal Date	7/2/2018
Certification Period Start Date	12/5/2017	End Date	6/4/2018

I. Certification of Continuous Compliance with Permit Terms and Conditions (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

II. Summary of Deviations (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
<p>A. Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency?</p> <p>If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal.</p> <p><i>Important Note:</i> If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency?</p> <p>If the answer to this question is 'Yes', please include the relevant reports along with this page.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



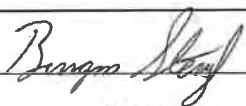
Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name		Blue Ridge Landfill TX, LP				Customer Number		CN602820599	
Area Name		Blue Ridge Landfill				Account Number		FG-0536-E	
Report Period Start Date		12/5/2017	Report Period End Date	6/4/2018	Operating Permit Number	O-01472	Report Submittal Date		7/2/2018
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number		Term & Condition No.		Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID		Group ID							
FLARE2011 FLARE-T S3UFLARE1		N/A			30 TAC 111.111(a)(4) (A)(ii)	Record	517-09-004	Permit	Daily

Dev Item No.	STEERS Incident No.	Deviation Period			No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	Time	End Date			
1	N/A	12/5/2017		6/4/2018	1	Flare observation records were maintained on days the facility was operational. However, when the site was closed daily flare observations were not conducted.	On September 28, 2017 the TCEQ issued a memorandum which states that enforcement action will not be taken for missing flare observations on days that the landfill is closed. The landfill will continue to maintain flare observation records during landfill operational days.
Total Deviations:					1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information					
RN: 102610102		CN: 602820599		Account No.: FG-0536-E	
Permit No.: O-01472			Project No.:		
Area Name: Blue Ridge Landfill			Company Name: Blue Ridge Landfill TX, LP		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input type="checkbox"/> Responsible Official			<input checked="" type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Semi-Annual Compliance Certification</u>					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>Burgess Stengl</u> certify that I am the <u>DAR</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i>					
Specific Dates: <u>07 / 02 / 2018</u> <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i>					
Signature: <u></u>			Signature Date: <u>6/28/18</u>		
Title: <u>Environmental Manager</u>					

ATTACHMENT 6
TCEQ Observation and Check Data
4 Pages

Blue Ridge Landfill
2200 FM 521
Fresno, Texas 77545
RN 102610102
FG-0536-E

Investigation Date:
April 30, 2018 through July 6, 2018

Investigation Number:
1486565

Phase 1		Phase 3	
Exceedance Location Number	1	4	7
TCEQ Observation Monitoring			10
	Latitude		
	Longitude		
	Date	29.558778	29.565111
	TVA Reading (ppm)	-95.449389	-95.452111
	J605 Results	5/2/2018	5/3/2018
TCEQ Final Check	Comments	5000 - 1.8%	1294
		0.134 ppm	21.61 - 32.88 ppb
		Surface	Surface
		Not Present	
Instrument VOC Reading (ppm) Instrument H2S Reading	Latitude	29.55877	29.56865
	Longitude	-95.4494	-95.4474
	Date	6/6/2018	6/6/2018
		4900	1350
		17.83 - 21.55 ppb	21.82 ppb
		6.003 ppm	812
Comments	LCR 1-2	Surface	Surface

Exceedance Location Number	11	12	13	14	15
TCEQ Observation Monitoring					
	Latitude	29.565028	29.565	NA	NA
	Longitude	-95.452111	-95.45125	NA	NA
	Date	5/3/2018	5/3/2018	NA	NA
	TVA Reading (ppm)	941 - 1068	11.80%	1808	NA
	J605 Results	1.371 ppm	0.32 ppb	9.09 ppb	NA
	Comments	Surface	Surface	Not Present	Not Present
	TCEQ Final Check				
	Latitude	29.56506	29.56502	29.56502	29.56466
Instrument VOC Reading (ppm)	Longitude	-95.451527	-95.451352	-95.451213	-95.44903
	Date	6/6/2018	6/6/2018	6/6/2018	6/6/2018
	Instrument H2S Reading	700	2241	1500	1819
		24.74 ppb	3.18 ppb	49.12 ppb	100.7 ppb
	Comments	Surface	Surface	Surface	Surface

Investigation Type: FLAIR MON

Air Account NO: EG-0536-E

Attachment: 6

Page: 2 of 4

Exceedance Location Number	19	22	23	25
TCEQ Observation Monitoring Latitude Longitude Date TVA Reading (ppm) J605 Results Comments				
	NA	29.565833	29.565861	29.565694
	NA	-95.452667	-95.450778	-95.465667
	NA	5/4/2018	5/4/2018	5/4/2018
	NA	3500	7000	4000
	NA	103.5 ppb - 1.317 ppm	9.5 ppb	3.07 - 27.2 ppb
TCEQ Final Check Latitude Longitude Date Instrument VOC Reading (ppm) Instrument H2S Reading Comments	Not Present	W3-126	W3-61A	W3-51A
	29.56826	29.56581	29.56584	29.56569
	-95.447893	-95.451287	-95.450755	-95.448988
	6/6/2018	6/6/2018	6/6/2018	6/6/2018
	5762	3841	9051	2586
	0	105.13 ppb	0.308 ppm	29.44 ppb
	LCR 3-6 Header access	W3-126	W3-61A	W3-51A

Investigation Type: FLAIRMDN

Air Account NO: FG-0536-E

Attachment: 6

Page: 3 of 4

Exceedance Location Number	28	34	35
TCEQ Observation Monitoring Latitude Longitude Date TVA Reading (ppm) J605 Results Comments			
	29.567556	29.567611	29.567639
	-95.445972	-95.447167	-95.447778
	5/4/2018	5/4/2018	5/4/2018
	640	6000	2.80%
	7.86 - 40.82 ppb	11.68 ppb	0
	W3-99	W3-94	W3-90
TCEQ Final Check Latitude Longitude Date Instrument VOC Reading (ppm) Instrument H2S Reading Comments			
	29.56754	29.56759	29.56755
	-95.446	-95.447837	-95.448678
	6/6/2018	6/6/2018	6/6/2018
	1488 - 4000	1449	5590 - 1.02%
	0 ppb	5.04 ppb	7.42 ppb
	W3-99	W3-94	W3-90

Investigation Type: F1AIRMON

Air Account NO: FG-0536-E

Attachment: 6

Page: 4 of 4

ATTACHMENT 7

Photographs

58 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

Blue Ridge Landfill
May 1, 2018
Initial Observation Monitoring
Phase 1: Exceedance Location 1 (LCR 1-2)

Time: 10:21 AM
Photograph Taken by:
Samuel Cortez



**Blue Ridge Landfill
June 6, 2018
Final Check**

Phase 1: Exceedance Location 1 (LCR1-2)

Time: 1:07 PM
Photograph Taken by:
Samuel Cortez





Blue Ridge Landfill
May 2, 2018
Initial Observation Monitoring
Phase 1: Exceedance Location 4 (Surface)

Time: 10:00 AM
Photograph Taken by:
Samuel Cortez



Time: 10:00 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 1: Exceedance Location 4 (Surface)

Investigation Type: EAIRMON
Air Account No.: EG-0536-E
Attachment: 7
Page: 7 of 58

Time: 12:55 PM
Photograph Taken by:
Samuel Cortez



Time: 12:55 PM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 1: Exceedance Location 7 (Surface)

Time: 11:11 AM
Photograph Taken by:
Samuel Cortez





Time: 11:11 AM
Photograph Taken by:
Samuel Cortez





Blue Ridge Landfill

May 3, 2018

Initial Observation Monitoring

Phase 3: Exceedance Location 10 (Surface)

Time: 10:17 AM
Photograph Taken by:
William Austin Jorn

Time: 10:17 AM
Photograph Taken by:
William Austin Jorn

Investigation Type: FAIRMOM
Air Account No.: FG-0536-E
Attachment: 7
Page: 11 of 56



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 10 (Surface)

Time: 8:50 AM
Photograph Taken by:
Danielle Woods

[Handwritten signature]



06 06 2018 08:50

Blue Ridge Landfill

May 3, 2018

Initial Observation Monitoring Phase 3: Exceedance Location 11 (Surface)

Investigation Type: EIA/RMON
Air Account No.: EG-0536-E
Attachment: 7
Page: 15 of 58

Time: 10:36 AM
Photograph Taken by:
Danielle Woods

Danielle Woods



Time: 10:40 AM
Photograph Taken by:
Danielle Woods

Danielle Woods



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 11 (Surface)

Time: 8:57 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill

May 3, 2018

Investigation Type: EIA/RMON
Air Account No.: FG-0536-E
Attachment: 7
Page: 19 of 58

Initial Observation Monitoring

Phase 3: Exceedance Location 12 (Surface)

Time: 10:46 AM
Photograph Taken by:
Samuel Cortez





Time: 10:47 AM
Photograph Taken by:
Samuel Cortez





Blue Ridge Landfill

June 6, 2018

Final Check

Phase 3: Exceedance Location 12 (Surface)

Time: 8:59 AM

Photograph Taken by:

Danielle Woods



06 06 2018 08:59

Blue Ridge Landfill
May 3, 2018
Initial Observation Monitoring
Phase 3: Exceedance Location 13 (Surface)

Investigation Type: EIA/RMON
Air Account No.: EG-0538-E
Attachment: 7
Page: 23 of 58

Time: 10:51 AM
Photograph Taken by:
Samuel Cortez



Time: 10:52 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 13 (Surface)

Time: 9:05 AM
Photograph Taken by:
Samuel Cortez



Time: 9:05 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 14 (Surface)

Time: 9:22 AM
Photograph Taken by:
Danielle Woods

Danielle Woods



06-06-2018 09:22

Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 15 (Surface)

Time: 9:21 AM
Photograph Taken by:
Samuel Cortez



Investigation Type: EIA/RMON
Air Account No.: EG-0538-E
Attachment: 7
Page: 29 of 58

Time: 9:21 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 19 (LCR3-6)

Investigation Type: EIA/RMON
Air Account No.: EG-0536-E
Attachment: 7
Page: 31 of 56

Time: 10:57 AM
Photograph Taken by:
Samuel Cortez



Time: 10:58 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
May 4, 2018
Initial Observation Monitoring
Phase 3: Exceedance Location 22 (W3-126)

Time: 10:35 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 22 (W3-126)

Time: 10:11 AM
Photograph Taken by:
Danielle Woods

Danielle Woods



Blue Ridge Landfill

May 4, 2018

Initial Observation Monitoring Phase 3: Exceedance Location 23 (W3-61A)

Time: 10:53 AM

Photograph Taken by:
Samuel Cortez

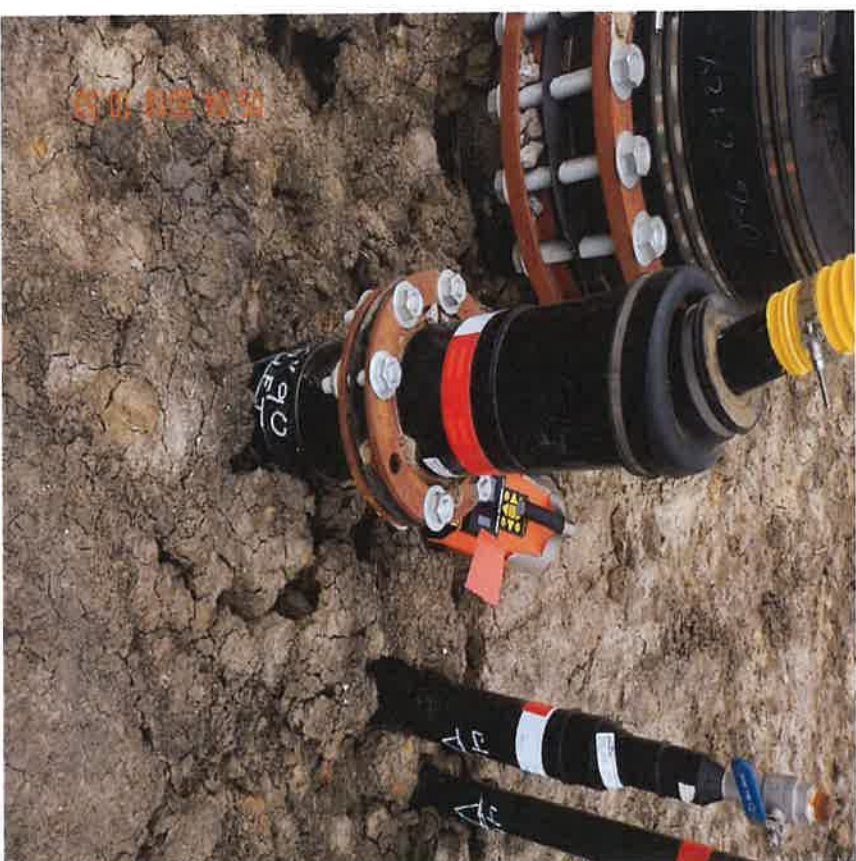




Time: 10:53 AM

Photograph Taken by:
Samuel Cortez





Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 23 (W3-61A)

Time: 9:55 AM
Photograph Taken by:
Danielle Woods

Danielle Woods



Blue Ridge Landfill
May 4, 2018
Initial Observation Monitoring
Phase 3: Exceedance Location 25 (W3-51A)

Investigation Type: HAIRMON
Air Account No.: FG-0536-E
Attachment: 7
Page: 41 of 58

Time: 11:07 AM
Photograph Taken by:
Samuel Cortez



Time: 11:08 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill June 6, 2018 Final Check Phase 3: Exceedance Location 25 (W3-51A)

Time: 9:42 AM
Photograph Taken by:
Samuel Cortez

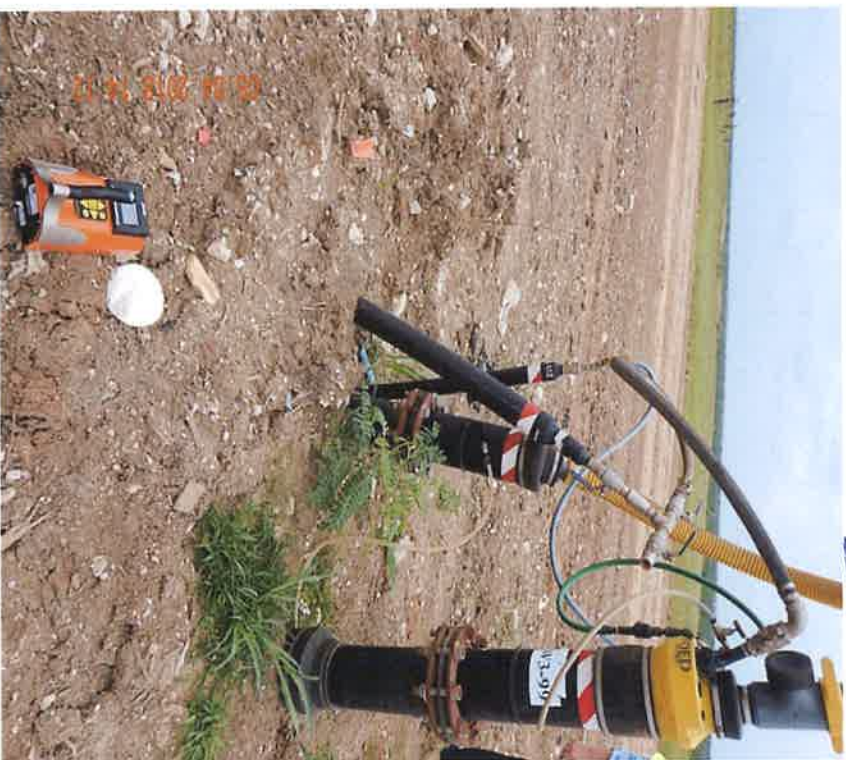


Time: 9:42 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
May 4, 2018
Initial Observation Monitoring
Phase 3: Exceedance Location 28 (W3-99)

Time: 2:12 PM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
May 4, 2018
Initial Observation Monitoring
Phase 3: Exceedance Location 34 (W3-94)

Time: 2:51 PM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 34 (W3-94)

Time: 11:21 AM
Photograph Taken by:
Danielle Woods

Danielle Woods



Blue Ridge Landfill

May 4, 2018

Initial Observation Monitoring

Phase 3: Exceedance Location 35 (W3-90)

Time: 3:05 PM

Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
June 6, 2018
Final Check
Phase 3: Exceedance Location 35 (W3-90)

Time: 10:55 AM
Photograph Taken by:
Danielle Woods

Danielle Woods



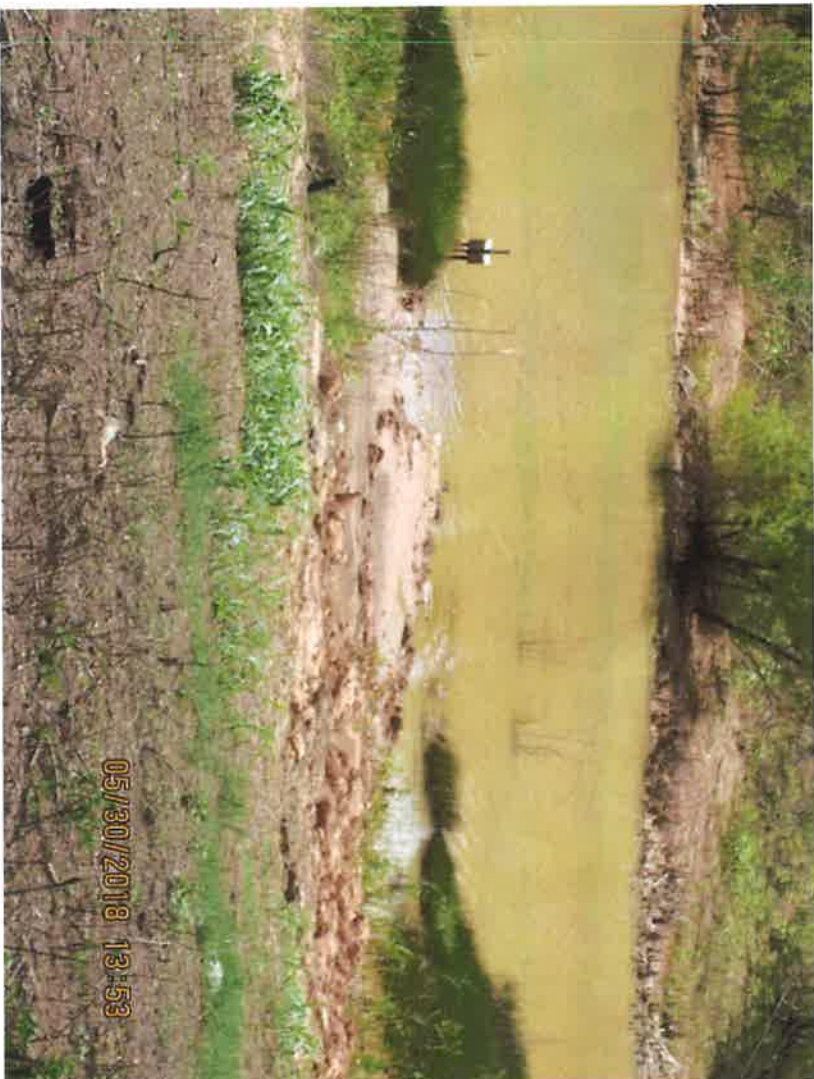
Blue Ridge Landfill
May 18, 2018
TCEQ SEM
Class 1/Phase 2: Visible Dark Pool of Liquid

Time: 11:14 AM
Photograph Taken by:
Samuel Cortez



Blue Ridge Landfill
May 30, 2018
Final Check
Class 1/Phase 2: Visible Dark Pool of Liquid

Time: 1:53 PM
Photograph Taken by:
Samuel Cortez



ATTACHMENT 8

OGIC Videos

AIR CP_102610102_CP_20180430_INVESTIGATION_2_1486565_

AIR CP_102610102_CP_20180430_INVESTIGATION_3_1486565_

AIR CP_102610102_CP_20180430_INVESTIGATION_4_1486565_

AIR CP_102610102_CP_20180430_INVESTIGATION_5_1486565_

AIR CP_102610102_CP_20180430_INVESTIGATION_6_1486565_

(Available Electronically)

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

ATTACHMENT 9

TCEQ SEM Data

1 Page

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

	Date	Latitude	Longitude	TVA (ppm)	Comments
Phase III					
	5/15/2018	29.566450	-95.453510	750	Under liner
	5/15/2018	29.565390	-95.452880	7000	Sump 3-11A
	5/16/2018	29.567010	-95.452840	5000	W-380 Remote
	5/16/2018	29.565830	-95.451270	1338	W3-126
	5/16/2018	29.567350	-95.452780	537	LCR35
	5/16/2018	29.565900	-95.452260	886	W-384
	5/16/2018	29.565510	-95.450610	1285	CFM
	5/16/2018	29.567810	-95.451520	1061	CS3-10
	5/16/2018	29.565520	-95.451030	615	Isolation Valve
	5/16/2018	29.566690	-95.451000	6000	W3-67A
	5/16/2018	29.567100	-95.451230	2180	W3-70
	5/16/2018	29.566040	-95.449220	1354	W3-132
	5/16/2018	29.567580	-95.450290	1150	W3-58A
	5/16/2018	29.566330	-95.449510	2000	W3-106
	5/16/2018	29.567100	-95.449200	4500	W3-131
	5/16/2018	29.568180	-95.449710	1000	CS-39
	5/16/2018	29.567550	-95.448810	6000	W3-54A
	5/16/2018	29.567150	-95.448720	1200	W3-53A
	5/17/2018	29.567610	-95.447820	1100	W3-90
	5/17/2018	29.565910	-95.447780	814	W3-38A
	5/17/2018	29.568280	-95.447870	2000	LCR3-6
	5/17/2018	29.568110	-95.445790	1025	W3-102/W3-141
	5/17/2018	29.565920	-95.445430	680	W-331A
	5/17/2018	29.567710	-95.444800	8900	CS3-16
	5/17/2018	29.565310	-95.444280	1203	W3-26A
	5/17/2018	29.565000	-95.444990	9000	W3-27A
	5/18/2018	29.564370	-95.443710	617	W3-13R
	5/18/2018	29.564710	-95.443290	8,321	W3-22
	5/18/2018	29.565120	-95.441470	14,700	W3-312
	5/18/2018	29.564220	-95.441730	6,082	LCR 3-1
Phase II/Class I					
	5/18/2018	29.55947	-95.45376	NA	Visible leachate in ditch
Phase I					
	5/24/2018	NA	N/A	630	W-39A
	5/24/2018	29.55675	-95.45029	503	Surface
	5/24/2018	29.55637	-95.44642	2,479	W-11A

Investigation Type: FLAIRMON
Air Account NO: FG-0536-E
Attachment: 9
Page: 1 of 1

ATTACHMENT 10
Supporting Documentation
2 Pages

Blue Ridge Landfill
2200 FM 521
Fresno, Texas 77545
RN 102610102
FG-0536-E

Investigation Date:
April 30, 2018 through July 6, 2018

Investigation Number:
1486565

Investigation Type: FIARMOY

Air Account NO: FG-0736-E

Attachment: 10

Page: 2 of 2

ATTACHMENT 11

Flare Documentation

10 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

Samuel Cortez

From: Stengl, Burgess
Sent: Tuesday, August 21, 2018 3:32 PM
To: Samuel Cortez
Cc: Meadows, Mark; Nagaraj, Archana
Subject: RE: Records Request
Attachments: Supporting Documentation-Blue Ridge-EI2017.pdf

Mr. Cortez, per your attached records request, please see the below responses, and the attached document.

1. Enclosed Flare average flow rate, peak max flow for 2017, max capacity, hours, total emissions in 2017: The design capacity of the enclosed flare is 6,000 scfm. The 2017 flow rate, hours of operation and total emissions were reported in the Emissions Inventory submittal, which is attached. The maximum operating flow was 5,275 scfm averaged over approximately 23 hours that occurred on April 7, 2017.
2. Utility Flare average flow rate, peak max flow for 2017, max capacity, hours, total emissions in 2017: The design capacity of the utility flare is 3,000 scfm. The 2017 flow rate, hours of operation and total emissions were reported in the Emissions Inventory submittal, which is attached. The maximum operating flow was 2,737 scfm averaged over approximately 19.5 hours that occurred on July 15, 2017.
3. Rental Flare average flow rate, peak max flow for 2017, max capacity, hours, total emissions in 2017: The design capacity of the rental flare is 2,100 scfm. The 2017 flow rate, hours of operation and total emissions were reported in the Emissions Inventory submittal, which is attached. The maximum operating flow was 2,190 scfm averaged over approximately 5 days that occurred on December 8, 2017. The slightly higher flow rates may have been due to flow meter fluctuations.
4. Pipeline average flow rate, peak max flow for 2017, max capacity, hours, total collected in 2017: The design capacity of the Beneficial-Use Plant (Pipeline) is 6,000 scfm. The 2017 flow rate was approximately 2,658 scfm and operated about 4,944 hrs in 2017. The total LFG collected in 2017 was 788,560,291 scf. The maximum operating flow was 5145 scfm averaged over approximately 30 minutes that occurred on May 31, 2017.
5. Total MSW submittal in 2017: It is our understanding that the requested information is total MSW waste accepted in 2017. This value is included in the LandGEM in the 2017 EI which is attached.
6. LandGEM 2017: Included in the attached 2017 EI submittal.
7. Total Capacity of Controls: The current on-site total control design capacity is 17,100 scfm, which includes 6,000 scfm enclosed flare, 3000 scfm of utility flare, 2,100 scfm rental flare, 6,000 scfm gas plant.

Please let me know if you have any questions.

Thank you,

Burgess Stengl
Environmental Manager

USPS: P.O. Box 879, Fresno, TX 77545

Investigation Type: FIADRM2018
Air Account NO: FG-0536-E
Attachment: 11
Page: 1 of 10

Overnight Pkgs: 2200 FM 521, Fresno, TX 77545
e [REDACTED]
o 713-676-7669 c 713-851-0506
f 713-676-7882 w www.RepublicServices.com



We'll handle it from here."

[REDACTED]

From: Samuel Cortez [mailto:samuel.cortez@tceq.texas.gov]
Sent: Tuesday, August 21, 2018 2:29 PM
To: Stengl, Burgess [REDACTED]
Subject: RE: Records Request

Note that (samuel.cortez@tceq.texas.gov) is an external email. Forward unfamiliar emails to [REDACTED]

Tomorrow, August 22, 2018.

From: Stengl, Burgess [REDACTED]
Sent: Tuesday, August 21, 2018 2:15 PM
To: Samuel Cortez <Samuel.Cortez@tceq.texas.gov>; [REDACTED]
Subject: RE: Records Request

Sam, please confirm the due date for the information.

Thank you,

Burgess Stengl
Environmental Manager

USPS: P.O. Box 879, Fresno, TX 77545
Overnight Pkgs: 2200 FM 521, Fresno, TX 77545
e [REDACTED]
o 713-676-7669 c 713-851-0506
f 713-676-7882 w www.RepublicServices.com



We'll handle it from here."

[REDACTED]

From: Samuel Cortez [mailto:samuel.cortez@tceq.texas.gov]
Sent: Tuesday, August 21, 2018 2:08 PM
To: Stengl, Burgess; [REDACTED]
Subject: RE: Records Request

Note that (samuel.cortez@tceq.texas.gov) is an external email. Forward unfamiliar emails to [REDACTED]

Mr. Stengl,

Attached is a records request for documentation regarding the LandGEM and GCCS controls revised from August 8, 2018 to include maximum peak values for 2017 for the control equipment. Please review and let me know if you have any questions or concerns. Please provide by 12PM Wednesday, August 21, 2018. Thank you for your time and cooperation, have a great day.

Samuel Cortez
Senior Environmental Investigator V
Texas Commission on Environmental Quality
Air Section, Region 12 Office
5425 Polk Street, Suite H
Houston, Texas 77023
Office: (713) 767-3723
Fax: (713) 767-3761
Email: samuel.cortez@tceq.texas.gov

From: Samuel Cortez
Sent: Wednesday, August 8, 2018 12:01 PM
To: 'Stengl, Burgess' [REDACTED]
Subject: Records Request

Mr. Stengl,

Attached is a records request for documentation regarding the LandGEM and GCCS controls. Please review and let me know if you have any questions or concerns. Thank you for your time and cooperation, have a great day.

Samuel Cortez
Senior Environmental Investigator V
Texas Commission on Environmental Quality
Air Section, Region 12 Office
5425 Polk Street, Suite H
Houston, Texas 77023
Office: (713) 767-3723
Fax: (713) 767-3761
Email: samuel.cortez@tceq.texas.gov



July 17, 2018

Mr. Sam Cortez, Air Section Investigator
Texas Commission on Environmental Quality
Environmental Investigator, Region 12, Houston
5425 Polk Street, Suite H
Houston, Texas 77023-1452

RE: Blue Ridge Landfill TX, LP, MSW Permit No. 1505A
TCEQ Exit Interview Form 7/13/18
Agreed Order, Odor Plan, 40 CFR 60 WWW compliance
TCEQ Add. ID No. FG0536E

Dear Mr. Cortez:

This letter is in response to your Exit Interview Form ("Form") provided to Blue Ridge Landfill (BRLF) via e-mail on July 13, 2018 at 4:35 p.m., with a response due by close of business on July 17, 2018. The Form requested information/documentation for four issues. The noted issues and responses are below.

Request 1: "Flare data: flow rates; pilot presence; exit velocity; net heating value (1st 2 weeks Aug. 2017 & 1st 2 weeks Dec. 2017)"

Response:

Please note, Pilot Presence, Exit Velocity, & Net heating Value are applicable to Utility flares.

- Pilot Presence: Temperature records provided in the attached flare charts demonstrate pilot presence.
- Exit Velocity:
 - * South Utility Flare (FlareT): 59.4 ft/s. Calculations are shown in Attachment 2 of the Initial Performance Test Report submitted May 1, 2006, and provided to the TCEQ during the BRLF Investigation on July 6, 2018.
 - * Rental Flare (FlareS3UFLARE1): 102.0 ft/s (Calculations shown in Appendix D of the Initial Performance Test Report submitted March 19, 2018), and provided to the TCEQ during the BRLF Investigation on July 6, 2018.
- Net Heating Value:
 - * South Utility Flare (FlareT): 522.47 BTU/ft³ (Calculations shown in Attachment 2 of the Initial Performance Test Report submitted May 1, 2006), and provided to the TCEQ during the BRLF Investigation on July 6, 2018.

Air Account NO: FG-0536-E

Attachment: 11

Page: 4 of 10

Mr. Sam Cortez
July 17, 2018
Page 2

** Rental Flare (FlareS3UFLARE1): 496.96 BTU/ft3 (Calculations shown in Appendix D of the Initial Performance Test Report submitted March 19, 2018), and provided to the TCEQ during the BRLF Investigation on July 6, 2018.*

Request 2: "H2S Fence line monitoring (May 22, 2018 – June 30, 2018)"

Response: On advice of counsel, we intend to provide the data according to the provisions of the Odor Plan that was negotiated between BRLF and TCEQ. There were important reasons that Section 3.3 of the Plan was so carefully worded, the primary reason being BRLF's concern about the use of raw data without analysis and context. For this reason, BRLF will place the H2S fence line monitoring data in the Site Operating Record. Therefore, BRLF will include the H2S fence-line monitoring data in the quarterly report that is placed in the site monitoring record pursuant to the terms of the Plan.

Please contact Mr. Duncan Norton, with Lloyd Gosselink Rochelle & Townsend, P.C. at 512-322-5884, if you would like to talk about the terms of the Plan and the Agreed Order.

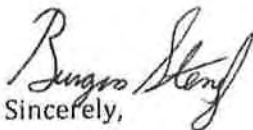
Request 3: "Mist system installation date"

Response: February 26, 2007

Request 4: "Portable mist system installation date"

Response: September 1, 2017

Please contact me at 713-676-7669 if you have any questions.

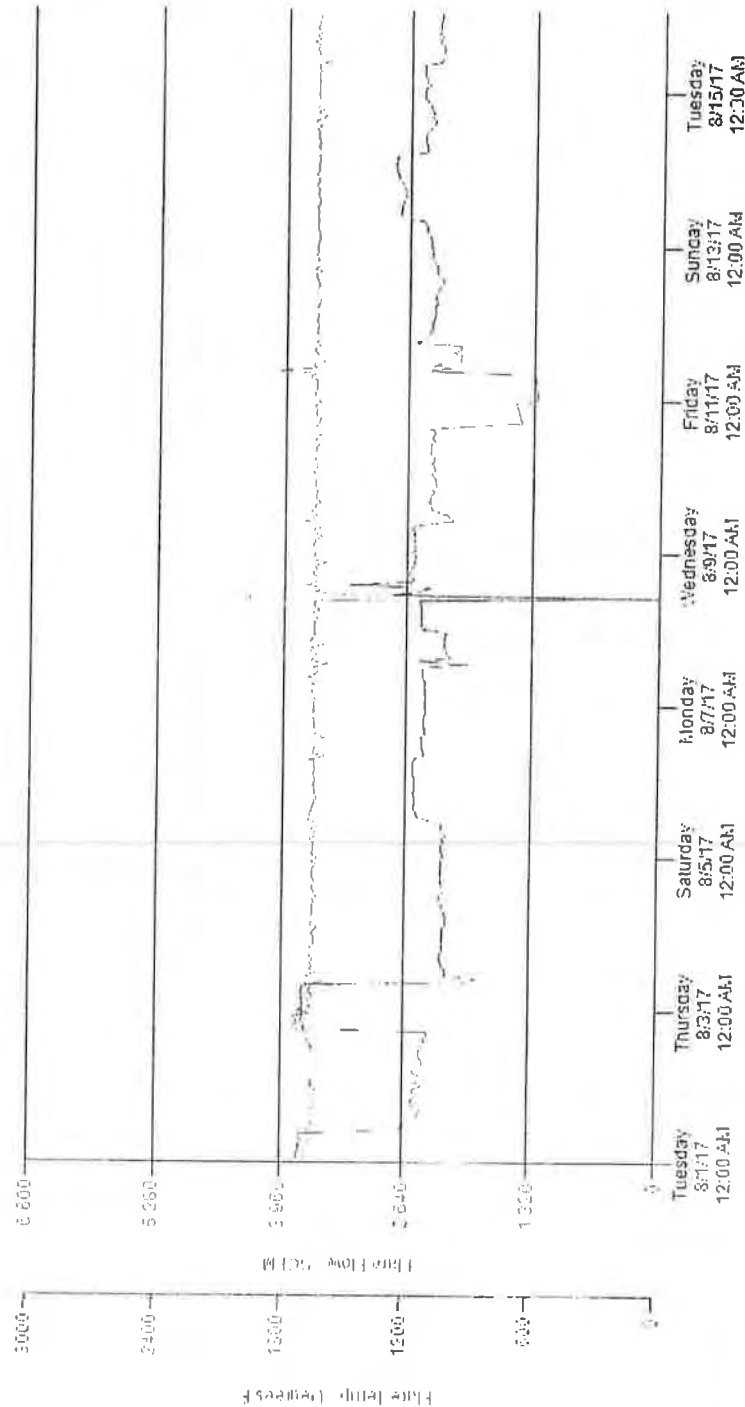

Sincerely,

Burgess Stengl
Environmental Manager

cc: Scott Trebus, Blue Ridge Landfill
Mark Meadows, Blue Ridge Landfill

Investigation Type: FLAIRMON
Air Account NO: 713-676-7669 6-E
Attachment: 11
Page: 5 of 10

Blue Ridge Landfill - Enclosed Flare - FXA-1045
8/1/2017 through 8/15/2017



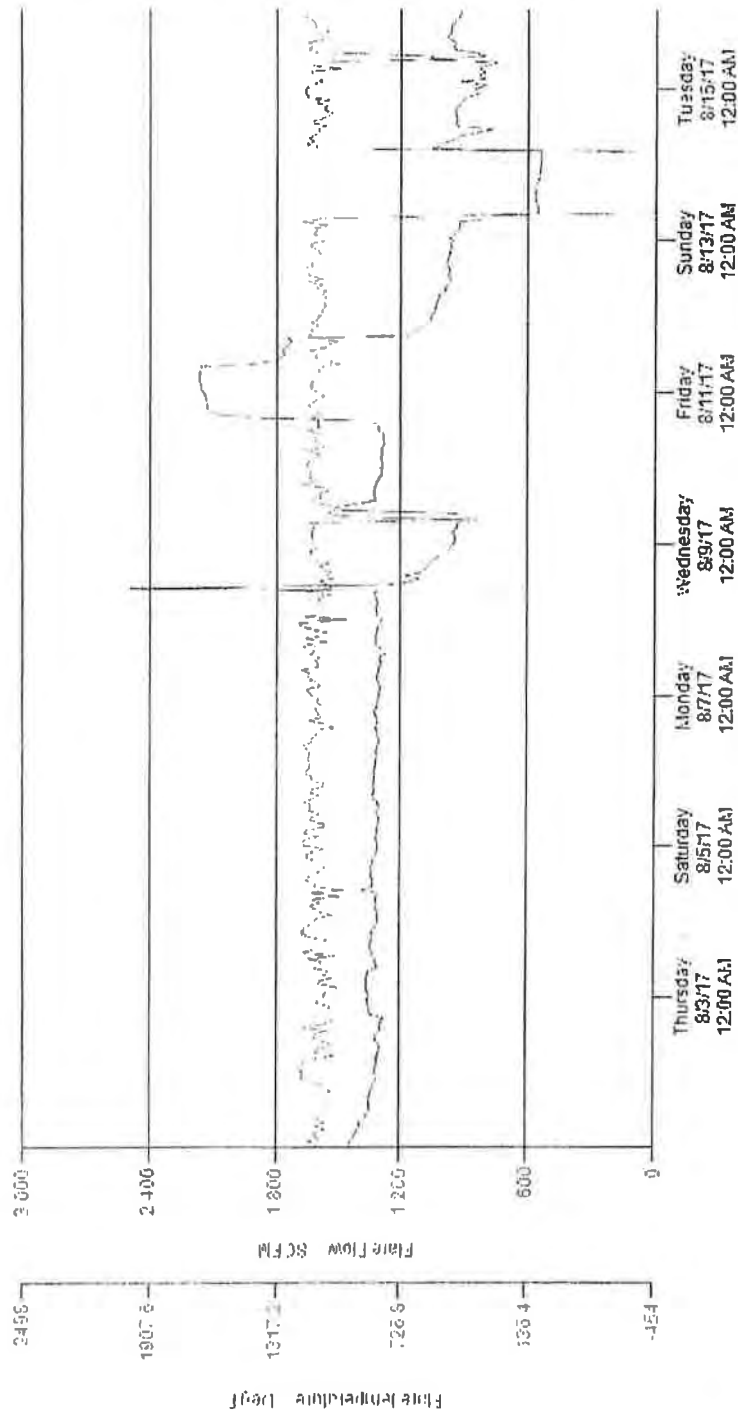
Investigation Type: KAIRMON

Air Account NO: F6-0536-E

Attachment: 11

Page: 6 of 10

Blue Ridge Landfill - Candle stick flare - FXA-1086
8/1/2017 through 8/15/2017



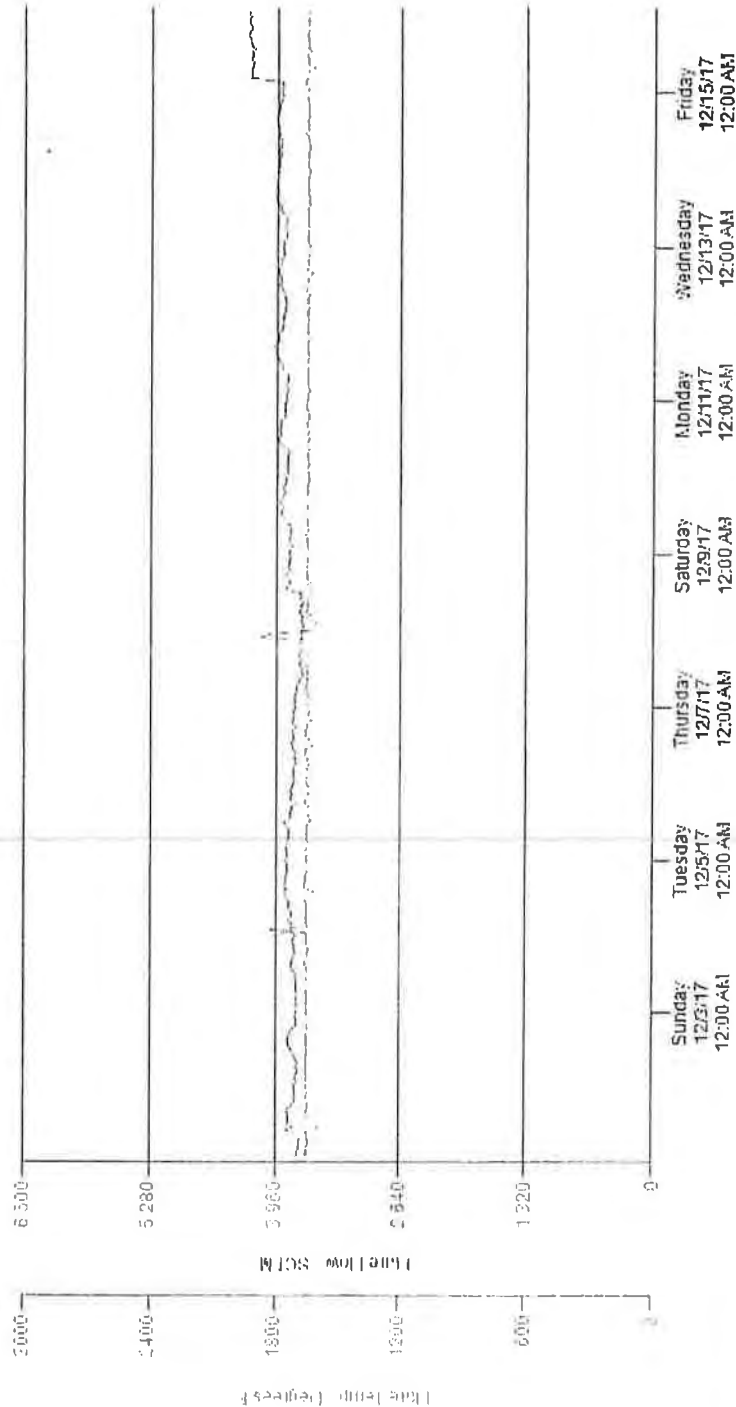
Investigation Type: FIAIRMON

Air Account NO: FG-0536-E

Attachment: 11

Page: 7 of 10

Blue Ridge Landfill - Enclosed Flare - FXA-1045
12/1/2017 through 12/15/2017



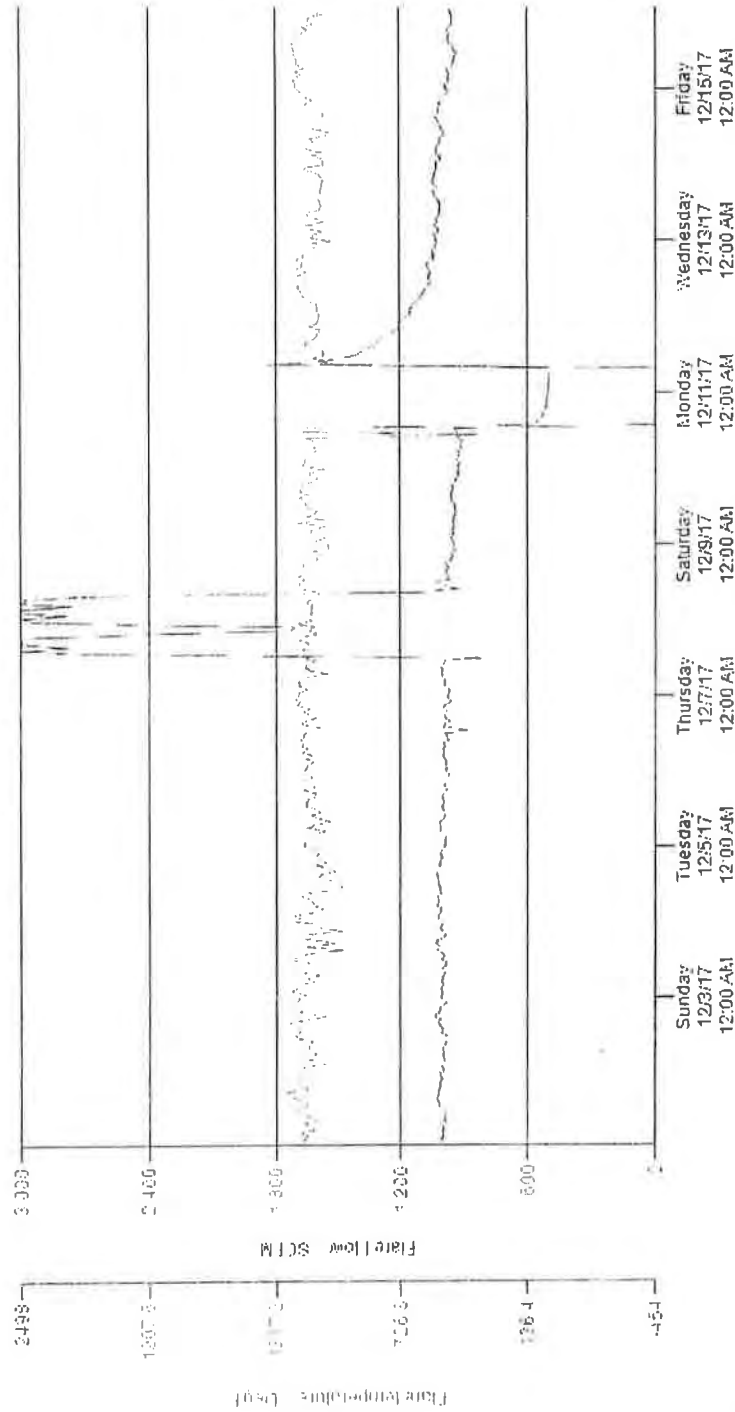
Investigation Type: FLAIR MON

Air Account NO: FG-0536-E

Attachment: 11

Page: 8 of 10

Blue Ridge Landfill - Candle stick flare - FXA-1086
12/1/2017 through 12/15/2017



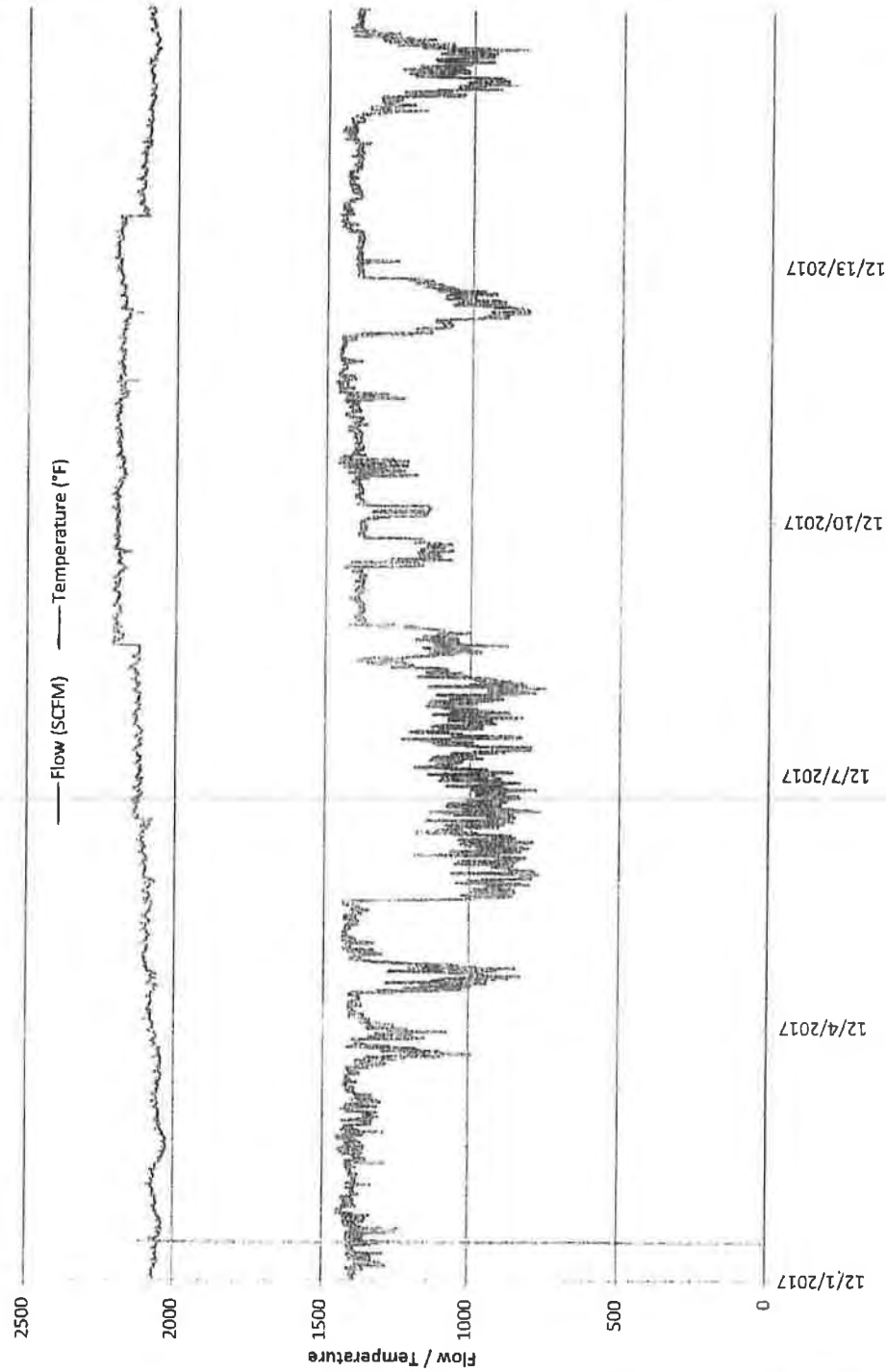
Investigation Type: FIARMA

Air Account NO: FG-0536-E

Attachment: 11

Page: 9 of 10

Blue Ridge Landfill Rental Flare Data December 1-15, 2017



Investigation Type: FLARENOX

Air Account NO: FL-0536-E

Attachment: 11

Page: 10 of 10

(CONFIDENTIAL)

ATTACHMENT 12

Supporting Documentation (CONFIDENTIAL)

20 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

ATTACHMENT 13

Exit Interview Forms

8 Pages

Blue Ridge Landfill

2200 FM 521

Fresno, Texas 77545

RN 102610102

FG-0536-E

Investigation Date:

April 30, 2018 through July 6, 2018

Investigation Number:

1486565

EXIT INTERVIEW FORM: Potential Violations and/or Records Requested					
Regulated Entity/Site Name		Blue Ridge Landfill		TCEQ Add. ID No. RN No (optional)	FG0536E
Investigation Type	FIAIR MON	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Agreed Order, Odor Plan, 40 CFR 60 WWW compliance
Regulated Entity Contact	Mr. Burgess Stengl		Telephone No.	Date Contacted	7/6/18
Title	Environmental Manager		E-mail:	Date Faxed:	

NOTICE: The information provided in this Note is intended to provide clarity to issues that have arisen to the date of this Note during the investigation process between the agency and the company and does not represent agency findings related to violations. Any potential or alleged violations discovered after the date of this Note will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in this investigation's final report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type ¹	Rule Citation (if known)	Description of Issue
1	RR	60.758	Flare data: flow rates; pilot presence; exit velocity; net heating value (1 st 2 weeks Aug. 2017 & 1 st 2 weeks Dec. 2017)
2	RR	Odor plan	H2S Fence line monitoring (May 22, 2018 – June 30, 2018)
3	RR	Odor plan	Mist system installation date
4	RR	Odor plan	Portable mist system installation date
			Due COB: 7/17/18

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> No <input type="checkbox"/> Yes
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> No <input type="checkbox"/> Yes

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Samuel Cortez	7/13/18	Regulated Entity Representative Name (Signature & Printed)	Investigator Name (Signed & Printed)
		Date	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call Air Account NO: FG-0536-E

Attachment: 13 Page: 1 of 8

SAFETY INFORMATION

CAUTION: ARIA

INSTRUCTIONS

Page 1

Investigation Type: FIATIR MON

Air Account NO: FG0536-E

Attachment: 15

Page: 2 of 8

EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name	Blue Ridge Landfill		TCEQ Add. ID No. RN No (optional)	RN102610102	
Investigation Type	Contact Made In-House (Y/N)	Yes	Purpose of Investigation	Compliance with SEM, NSPS, Odor Plan	
Regulated Entity Contact	Burgess Stengl		Telephone No.	713-6767669	Date Contacted 8/8/18
Title	Environmental Manager		E-mail:	NA	Date Faxed: NA

NOTICE: The information provided in this Note is intended to provide clarity to issues that have arisen to the date of this Note during the investigation process between the agency and the company and does not represent agency findings related to violations. Any potential or alleged violations discovered after the date of this Note will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in this investigation's final report.

Issue	For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.
No.	Type ¹
1	RR
2	RR
3	RR
4	RR
5	RR
6	RR
7	RR

Description of Issue	Did the TCEQ document the regulated entity named above operating without proper authorization?	Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Enclosed Flare average flow rate; max capacity, hours, total emissions 2017				
Utility Flare average flow rate; max capacity, hours, total emissions 2017				
Rental Flare average flow rate; max capacity, hours, total emissions 2017				
Pipeline average flow rate; max capacity; hours, total collected 2017				
Total MSW submittal 2017				
LandGEM 2017				
Total Capacity of controls				

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Samuel Cortez	8/8/2018	Regulated Entity Representative Name (Signed & Printed)	Date
---------------	----------	---	------

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

Investigation Type: Final Review

Air Account NO: FG-0536-E

Attachment: 13

Page: 3 of 8

SAFT INVESTIGATIVE

ON INVESTIGATION

INVESTIGATION

Investigation Type: FIADRMOM

Air Account NO: FC-0536-E

Attachment: 13

Page: 7 of 8

EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name	Blue Ridge Landfill		TCEQ Add. ID No. RN No (optional)	RN102610102	
Investigation Type	Contact Made In-House (Y/N)	Yes	Purpose of Investigation	Compliance with SEM, NSPS, Odor Plan	
Regulated Entity Contact	Burgess Stengl		Telephone No.	713-6767669	Date Contacted 8/8/18
Title	Environmental Manager		E-mail:	NA	Date Faxed: NA

NOTICE: The information provided in this Note is intended to provide clarity to issues that have arisen to the date of this Note during the investigation process between the agency and the company and does not represent agency findings related to violations. Any potential or alleged violations discovered after the date of this Note will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in this investigation's final report.

Issue	For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type ¹	Description of Issue
1	RR	Enclosed Flare average flow rate; peak max flow for 2017; max capacity; hours, total emissions 2017
2	RR	Utility Flare average flow rate; peak max flow for 2017; max capacity, hours, total emissions 2017
3	RR	Rental Flare average flow rate; peak max flow for 2017; max capacity, hours, total emissions 2017
4	RR	Pipeline average flow rate; peak max flow for 2017; max capacity; hours, total collected 2017
5	RR	Total MSW submittal 2017
6	RR	LandGEM 2017
7	RR	Total Capacity of controls

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Samuel Cortez	Investigator Name (Signed & Printed)	8/21/2018	Date
	Regulated Entity Representative Name (Signed & Printed)		Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 1-800-835-6889.

Investigation Type: Final
 Air Account NO: FG0536-E
 Attachment: 13
 Page: 5 of 8

1001 Broadway

NY, NY 10038, NY

FRANKLIN

NY 10014

Investigation Type: FIATRMW

Air Account NO: F6-0536-6

Attachment: 13

Page: 6 of 8

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request					
Regulated Entity/Site Name	Blue Ridge Landfill TX, LP		TCEQ Add. ID No. RN No (optional)	FG0536E	
Investigation Type	FIAIR MON	Contact Made In-House (Y/N)	Yes	Purpose of Investigation	Compliance Investigation
Regulated Entity Contact	Mr. Burgess Stengl	Telephone No.	(713) 676-7669	Date Contacted	October 10, 2018
Title	Environmental Manager	FAX #/Email address	NA	FAX/Email date	NA

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and does not represent final TCEQ findings related to violations. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation-report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.			
No.	Type ¹	Rule Citation (if known)	Description of Issue		
1	AV	40 CFR 60.11(d)	Failure to operate control equipment in a manner consistent w/ good air pollution control practice for minimizing emissions		
2	AV	40 CFR 60.757(f)(5)	Failure to include all exceedance information in the periodic NSPS report dated July 2, 2018		
3	AV	30 TAC 122.145(2)(A)	Failure to report all instances of deviations in the deviation report dated July 2, 2018		
4	O	40 CFR 60 WWW	Inconsistent recordkeeping and reporting		
5	O	40 CFR 60 WWW	Visible dark pool of liquid on Class 1/Phase 2		
6	O	Odor Control Plan	Inconsistent recordkeeping for surveys		
7	O	Odor Control Plan	Inconsistent recordkeeping for complaints		
8	O	Odor Control Plan	Pin flags not noted with sequential number		

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.

Samuel Cortez	10/10/18	Regulated Entity Representative Name (Signed & Printed)	Date
---------------	----------	---	------

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, please contact your local TCEQ Regional Office.

Investigation Type: FI AIR MON
 Air Account NO: FG-0536-E
 Attachment: 13
 Page: 7 of 8

242

Page: 8 of 8

ATTACHMENT 14
Monitoring Division Summary
8 Pages

Blue Ridge Landfill
2200 FM 521
Fresno, Texas 77545
RN 102610102
FG-0536-E

Investigation Date:
April 30, 2018 through July 6, 2018

Investigation Number:
1486565

Monitoring Division Summary of May 14-18, 2018, Pearland Sampling Event

OBJECTIVE:

The purpose of this sampling event was to assist Region 12 environmental investigators in determining the source of the odors in the Shadow Creek Ranch neighborhood in Pearland, Texas.

SAMPLING STRATEGY:

1. Conduct sampling during times that are consistent with the times documented complaints occurred. Most complaints from the Shadow Creek Ranch area over the last three years were documented as occurring between 8:00 p.m. and 8:00 a.m. as shown in Figure 1. Refer to the map of open complaints, Attachment A, for a visual representation of the investigation area. In addition, use wind direction to correlate odors observed in the neighborhood and documented in frequency, intensity, duration, and offensiveness (FIDO) surveys with the possible origins by conducting simultaneous downwind/upwind FIDO surveys around area facilities.

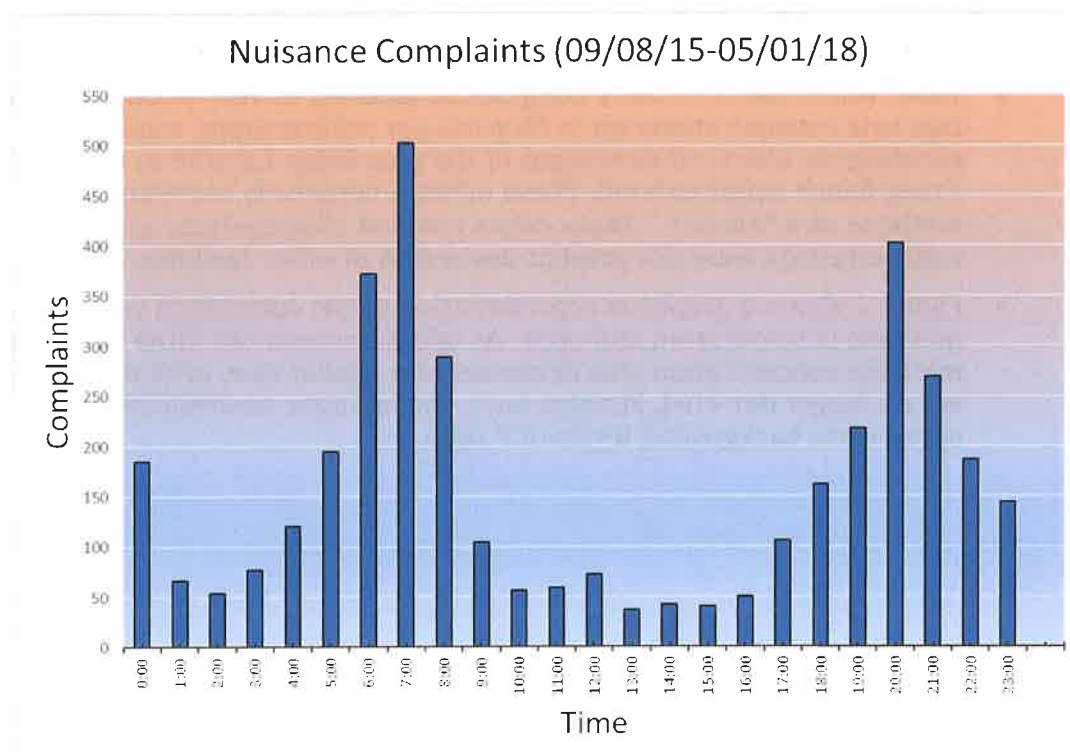


Figure 1: Number of odor complaints as reported throughout the day

2. Identify measurable "markers" related to instrument measurements and odor characterizations from FIDO surveys. Methane comprises a large portion of landfill gas and, while odorless, is a marker for the presence of other odorous compounds within the landfill gas make-up, including hydrogen sulfide (H_2S). Utilizing the ratio of methane to H_2S concentrations, establish a marker to distinguish between odor plumes from Blue Ridge Landfill and Lone Star Disposal and Recycling Facility (Lone Star Disposal).
3. Characterize odors for area facilities using instrumentation and FIDO surveys.

RESULTS AND CONCLUSIONS:

1. FIDO surveys were conducted in the Shadow Creek Ranch neighborhood, when odors warranted, at various times and locations between midnight and 10 a.m. on the mornings of May 15-17, 2018. In addition, specific downwind/upwind FIDO surveys and instrument measurements were conducted at each facility throughout the week. See Attachment B for a complete list of FIDO surveys conducted. Locations varied depending on wind direction at the time of the surveys but were generally in the western half of the neighborhood along Farm-to-Market (FM) 521 between Broadway and McHard Road.
 - Odorous conditions were observed in the Shadow Creek Ranch neighborhood the week of May 14-18, 2018, when winds were calm to light with a westerly component.
2. FIDO surveys were documented in coordination with measurements from the Picarro methane and H₂S analyzer to determine if either of these measurable compounds could be used as "markers" for odorous conditions. While there was no quantitative correlation between methane concentration and H₂S concentration as postulated, the methane concentration and odor intensity exhibited a qualitative correlation that can be used as a marker.
 - When winds had a westerly component, medium to very strong odors and methane concentrations up to 60 parts per million (ppm) were consistently observed downwind of the Blue Ridge Landfill in the Shadow Creek Ranch neighborhood. These odors qualitatively correlated to methane as a "marker." These odors coupled with methane at these concentrations were not present downwind of other facilities.
 - Figure 2 shows a graphical representation of the correlation between methane concentration and odor. As odors decrease for FIDO Log 9, the methane concentration also decreases at a similar rate, until the odors are no longer detected. Minutes later, the methane concentration approaches background levels of 2 ppm.

FIDO Log 9 Downwind Blue Ridge Landfill

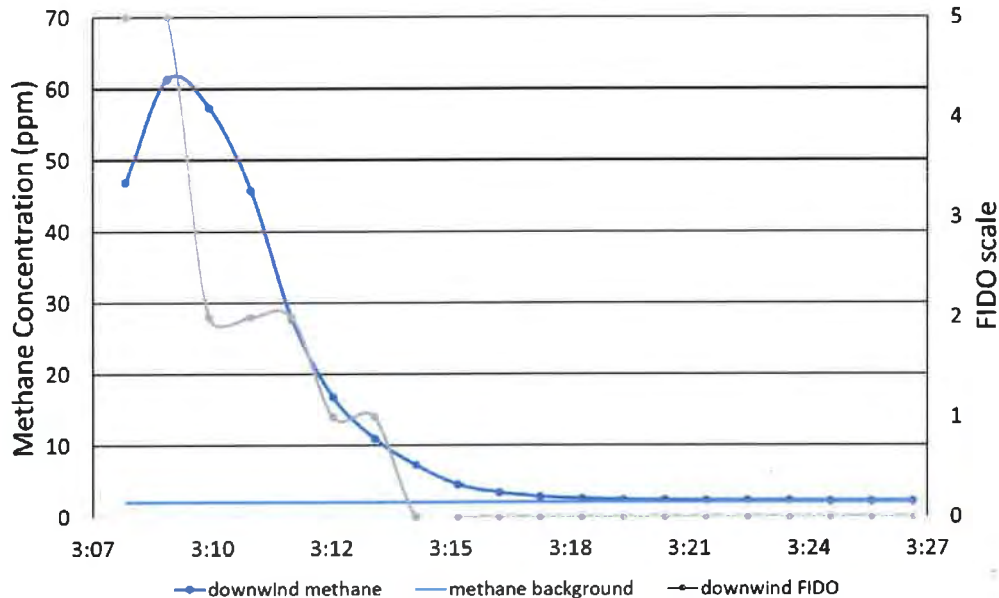


Figure 2: May 16, 2018–Comparison of downwind methane concentration measured with coinciding odor survey data. Wind speed averaged 3 mph out of the west-northwest direction.

- A correlation between H_2S and odors was not observed as no measurable (above method detection limits) H_2S was detected in the Shadow Creek Ranch neighborhood.
 - Blue Ridge Landfill and Lone Star Disposal were the only facilities in the area with measurable methane concentrations above background levels. The two landfills differed in ratio of methane to H_2S content making the two distinguishable from one another.
 - No concentrations were collected in the Shadow Creek Ranch neighborhood with the methane to H_2S ratio marker that would denote Lone Star Disposal as a contributor to odors observed.
3. Each potential source was assessed concurrently upwind and downwind to determine its odor profile. Each of the area facilities had its own distinct odor characteristics and differed from each other, except for Brenntag at which no odors were ever detected. Blue Ridge Landfill and Lone Star Disposal both have garbage odors, but odor characteristics are distinct between the two facilities due in part to the difference in H_2S content. Area facilities, excluding Blue Ridge, produce notable odors that are not consistent in character with odors observed in the Shadow Creek Ranch neighborhood. The odor characteristics in Shadow Creek Ranch neighborhood were consistent with the odors from Blue Ridge Landfill and were accompanied with the signature methane measurements associated with the landfill gases.

- **Shadow Creek Ranch**

Odors observed in the Shadow Creek Ranch neighborhood were described as moldy, soured garbage and were consistently observed with calm to light winds with a westerly component.

- **Blue Ridge Land Fill**

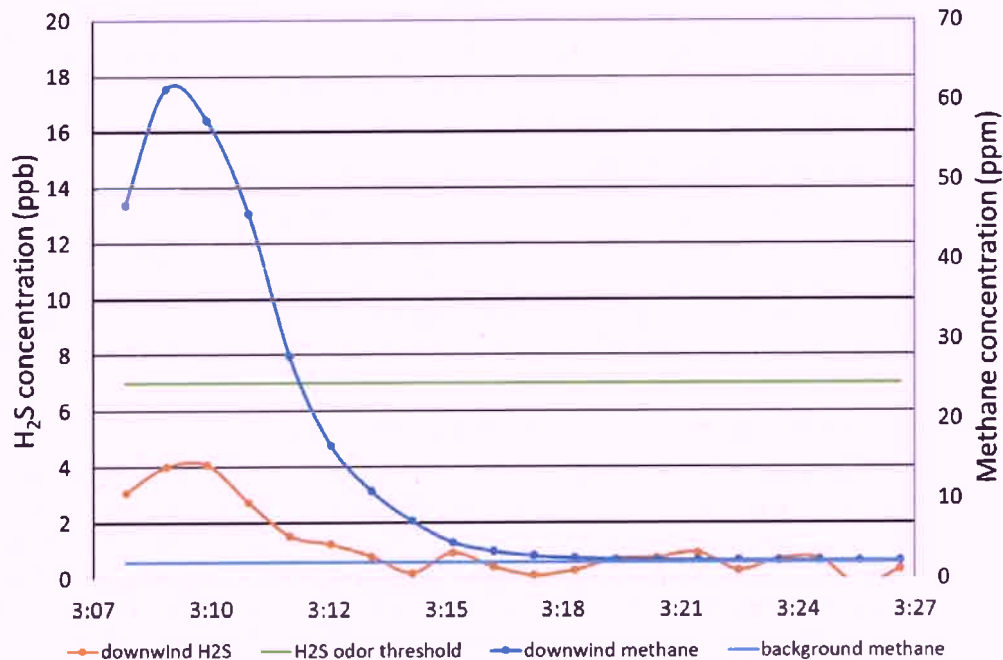
Odor descriptions of Blue Ridge Landfill were moldy, soured garbage odors consistent with those odors detected in the Shadow Creek Ranch neighborhood. These odors were detected, regardless of wind direction, when downwind of Blue Ridge Landfill.

- **Lone Star Disposal and Recycling Facility**

The light rancid popcorn garbage odors, observed northeast of the landfill were not intense enough to be compared to odors observed in the Shadow Creek Ranch neighborhood. Although methane was measured consistently above background levels (Figure 3) during the downwind FIDO surveys, concentrations were generally lower than those measured around Blue Ridge Landfill, making it difficult to correlate the light smell with minimal methane concentrations. H_2S concentrations were below the odor threshold of 7 parts per billion (ppb) and were difficult to correlate with the FIDO scale, indicating H_2S was not the likely cause of the observed odors.

Odors observed by investigators downwind of Lone Star Disposal were consistently lower in intensity, based on FIDO surveys, and higher in H_2S concentration than those documented downwind of the Blue Ridge Landfill. Figure 3 denotes a comparison of downwind methane and H_2S levels at Blue Ridge Landfill and Lone Star Disposal, showing the two facilities are distinguishable from one another based on methane and H_2S ratios.

Blue Ridge Landfill



Lone Star Disposal

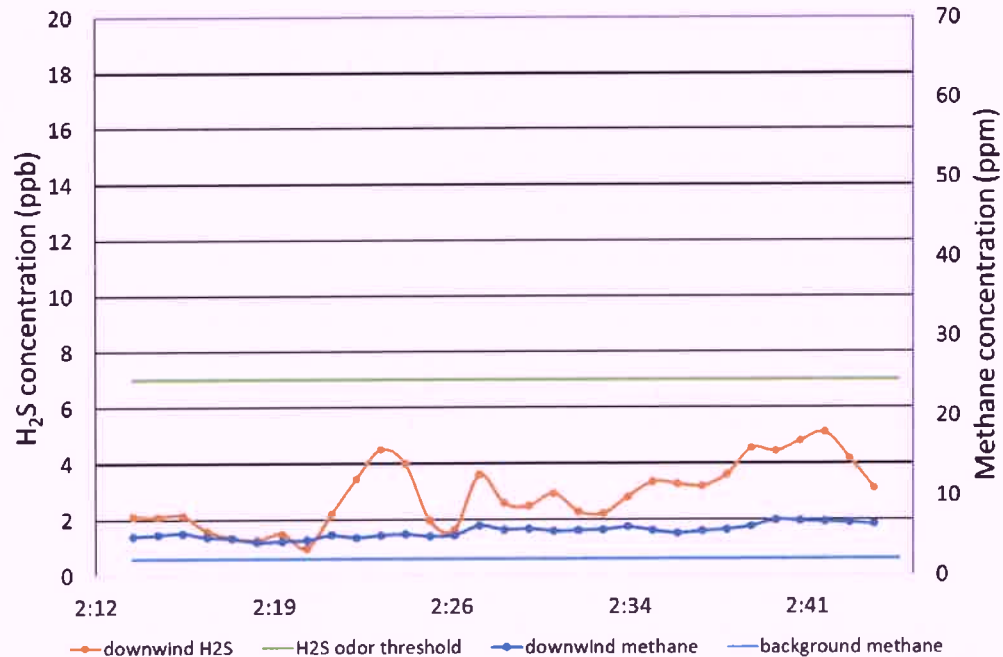


Figure 3: Lone Star Disposal showed only slightly elevated concentrations of methane in association with 3-5 ppb H₂S, whereas Blue Ridge Landfill produced similar H₂S concentrations when methane levels were 6 times as high at 60 ppm.

- **Syntech Chemicals Inc.**

No methane or H₂S concentrations were measured above the background level for methane or the odor threshold for H₂S at Syntech Chemicals Inc. indicating this is not a source of the odorous methane cloud. Fishy amine odors were observed downwind of Syntech and were not consistent with odors observed in the Shadow Creek Ranch neighborhood.

- **Brenntag Southwest Chemical Wholesaler**

No odor profile was characterized downwind of Brenntag Southwest Chemical Wholesaler. No concentrations above the background level for methane or the odor threshold for H₂S were recorded. No odors were detected by FIDO upwind or downwind of Brenntag. Including the 2016 monitoring data and two recent monitoring trips, no odors have been documented around Brenntag.

- **City of Pearland Wastewater Treatment Plant**

Odors around this facility were described as raw sewage and sulfur. These odors were different than those observed in the Shadow Creek Ranch neighborhood. Measurements indicate near-background methane concentrations with no correlation between odor and concentration. Part per billion levels of H₂S were measured near this facility; however, these concentrations were below the regulatory limit of 80 ppb for this compound and not likely to contribute to the moldy, soured garbage odors observed at Shadow Creek Ranch neighborhood.

- **Akzo Nobel Surface Chemistry Plant**

Minimal odors described as a sweet chemical smell were not consistent with the odors observed in the Shadow Creek Ranch neighborhood. The near-background levels of methane indicate this facility is not a methane source. No concentrations above the background level for methane or the odor threshold for H₂S were recorded.

- **Shadow Creek Lift Station**

Light odors observed in FIDO surveys near the lift station were described as a chemical, "port-a-potty" smell and were not consistent with the odors observed in other areas of the Shadow Creek Ranch neighborhood. Near-background methane concentrations near the lift station were recorded. No concentrations above the background level for methane or the odor threshold for H₂S were recorded.

NEXT STEPS:

- Most complaints do not include specific odor characterizations that could be used to help identify the source(s). Since local sources have distinct odor characterizations, a complaint reporting system that provides a selection of odor descriptions would provide more useful information to allow for source identification.
- Because of the similarity in odor characterization between observations downwind of the Blue Ridge Landfill and Lone Star Disposal, a meteorological assessment

should be used to determine how often complainant odors can be attributed to each facility.

- A closely coordinated monitoring effort should be scheduled to coincide with the next Surface Emissions Monitoring investigation at the Blue Ridge Landfill to assess plume movement and dilution over distance from leaking monitoring wells.
- Monitoring should also focus on downwind assessment of Blue Ridge Landfill between midnight and 4:00 a.m. during daily face opening activities to determine potential contributions to odor complaints.

Investigation Type: _____
Air Account NO: _____
Attachment: _____
Page: _____ of _____

Investigation Type: FIAIRMON
Air Account NO: FG-0536-E
Attachment: 14
Page: 8 of 8