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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 18, 2018

Mr. Burgess Stengl
Environmental Manager
Blue Ridge Landfill TX LP
P O Box 879
Fresno, Texas 77545

Re: Investigation Request at:
Blue Ridge Landfill, 2200 FM 521 Rd, Fresno (Fort Bend County), TX 77545-8214
TCEQ MSW Permit No.: 1505A
Investigation No.: 1497200

Dear Mr. Stengl:

The Texas Commission on Environmental Quality (TCEQ) Houston Region Office received on June 5, 7, 8, and 11, 2018 requests for assistance regarding the odor at the above-referenced facility. In response to this request, Ms. Reyna L. Loosmore of this office conducted an investigation on June 13, 2018. No violations are being alleged as a result of the investigation.

For more information about our complaint process, you may access the publication GI-278: *Do You Want to Make an Environmental Complaint? Do You Have Information or Evidence?* on our website at www.tceq.texas.gov.

We appreciate your assistance in this matter and your interest in protecting the quality of our environment. If you have any questions concerning these findings, or if we can be of further assistance, please contact Ms. Loosmore at this office (713) 767-3706.

Sincerely,

A handwritten signature in cursive script that reads "Alma L. Jefferson".

Alma L. Jefferson, Team Leader
Waste Section
Houston Region Office

ALJ/RLL/rsv

MSW PA_1505A_CP_20180613_Investigation
Texas Commission on Environmental Quality
Investigation Report

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

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

Investigation # 1497200

Incident Numbers

286142	286147
286139	286141
286144	286145
286146	

Investigator: REYNA LOOSMORE

Site Classification TYPE 1

Conducted: 06/13/2018 -- 07/11/2018

NAIC Code: 562212

NAIC Code: 486210

SIC Code: 4922

SIC Code: 4953

SIC Code: 1521

Program(s): MUNICIPAL SOLID WASTE DISPOSAL

Investigation Type: Compliance Investigation

Location: LOCATED ON 2200 FM 521

Additional ID(s): 1505A

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

Local Unit: REGION 12 - HOUSTON

Activity Type(s): MSWC MPL - Investigation of MSW
complaint

Principal(s):

Role	Name
RESPONDENT	BLUE RIDGE LANDFILL TX LP

Contact(s):

Role	Title	Name	Phone
PARTICIPATED IN	DIVISION MANAGER	MR MARK MEADOWS	Phone (281) 668-9739
REGULATED ENTITY MAIL CONTACT	ENVIRONMENTAL MANAGER	MR BURGESS STENGL	Office (713) 676-7669
REGULATED ENTITY CONTACT	ENVIRONMENTAL MANAGER	MR BURGESS STENGL	Office (713) 676-7669
PARTICIPATED IN	ENVIRONMENTAL SPECIALIST	MR CHANCE SEELY	Phone (281) 835-6142
PARTICIPATED IN	ENVIRONMENTAL SPECIALIST	MS AMY KUBINSKI	Phone (281) 835-6142

BLUE RIDGE LANDFILL - FRESNO

6/13/2018 to 7/11/2018 Inv. # - 1497200

Page 2 of 4

Other Staff Member(s):

Role	Name
QA Reviewer	BETHANY BATCHELOR
Supervisor	ALMA JEFFERSON

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
MSW COMPLAINT INVESTIGATION	1505A Complaint

Investigation Comments:

INTRODUCTION

On June 5, 7, 8, and 11, 2018, the Texas Commission on Environmental Quality (TCEQ) Houston Region Office Waste Section received seven (7) complaints alleging odors from Blue Ridge Landfill (BRL) located at 2200 FM 521 Road, Fresno (Fort Bend County), Texas 77545. The odors were alleged to have occurred on June 4 and 8, 2018.

On June 13, 2018, Ms. Reyna L. Loosmore, Environmental Investigator of the TCEQ Houston Region Office, conducted an odor survey and an unannounced on-site Odor Complaint Investigation at BRL and the area surrounding it.

BACKGROUND

A Notice of Enforcement was issued to BRL on October 21, 2016 for failure to prevent nuisance odor conditions. On July 12, 2017, Agreed Order Docket No. 2016-1923-AIR-E was signed by the TCEQ. By letter dated April 10, 2018, the TCEQ Enforcement Division approved the BRL Odor Control Plan thus requiring BRL to implement all provisions of the plan in accordance with the approved schedule.

GENERAL FACILITY AND PROCESS INFORMATION

BRL is a Type I landfill which is authorized to operate by TCEQ Municipal Solid Waste (MSW) Permit No. 1505A.

The landfill is authorized to dispose of MSW including household solid waste, commercial solid waste, construction and demolition waste, and yard waste; Class 1, Class 2, and Class 3 non-hazardous industrial solid waste; and certain special wastes. Liquid waste will be accepted at the Liquid Waste Bulking Facility for stabilization and subsequent disposal. BRL may not accept regulated hazardous waste, prohibited polychlorinated biphenyls, or untreated medical waste.

The waste acceptance hours are Monday through Friday, 4:00 am to 5:00 pm, and Saturdays from 5:30 am to 12:00 pm. The surrounding land use includes industrial facilities and residential subdivisions.

Complainant Information:

See confidential files (TCEQ Incident Nos. 286139, 286141, 286142, 286144, 286145, 286146, and 286147.

Description of Alleged Effects:

Irritation of throat/nose and difficulty breathing were described as occurring because of the odors.

Meteorological data at the time of the odor survey:

Date: June 13, 2018

Wind Direction: south-southeast (SSE) to south (S)

BLUE RIDGE LANDFILL - FRESNO

6/13/2018 to 7/11/2018 Inv. # - 1497200

Page 3 of 4

Wind Speed: average 5.8 mph

Outdoor Temperature: average 87 °F

Meteorological data taken from TCEQ's continuous air monitoring station Manvel Croix Park C84 weather station (Attachment 1).

Odor Survey (OS):

The investigator arrived at the first OS point located at the intersection of McHard Road (FM 2234) and Amy Ridge Road in Houston and downwind of BRL. OS No. 1 was conducted at 8:36 a.m. No odors were detected during the 15 minutes spent at OS No. 1.

OS No. 2, located at the intersection of Hiram Clarke Road and Summerlyn Drive in Houston and downwind of Lonestar Landfill/Akzo Nobel Surface Chemistry (Akzo), was conducted at 9:04 a.m. No odors were detected during the 15 minutes spent at OS No. 2.

OS No. 3, located at the 300 block of W. Riley Road in Pearland and downwind of Brenntag Southwest/Syntech Chemicals and the Reflection Bay Wastewater Treatment Plant (WWTP), was conducted at 9:35 a.m. No odors were detected during the 15 minutes spent at OS No. 3.

OS No. 4, located at the 2700 block of Autumn Falls Drive in Pearland and downwind of the Sewer Lift Station, was conducted at 10:04 a.m. No odors were detected during the 15 minutes spent at OS No. 4.

An aerial view map of the OS locations and the OS logs are included in Attachment 1.

Summary of the on-site investigation:

Following the odor survey, the investigator arrived at BRL and met with Mr. Chance Seely, Environmental Specialist; Ms. Amy Kubinski, Environmental Specialist, and Mr. Mark Meadows, Division Manager to whom the purpose and scope of the investigation were explained.

BRL receives MSW in the MSW cell of the landfill from Monday through Saturday. Six inches of soil is applied at the end of each operating day. The facility representatives drove the investigator to the MSW and Class 1 working faces, by which piles of soil were observed. The investigator obtained a copy of the MSW cover logs from May 2018 through June 12, 2018 (Attachment 2). The cover logs indicated that soil is applied to the MSW working face as required.

Description of Odor:

No odors were detected during the odor survey.

Description of the Effects on the Investigator:

No health effects were experienced by the investigator.

Description of the Terrain Features of the Area:

Terrain is flat with residences and businesses.

Location of the Source of the Odor:

No odors were detected off-site by the investigator.

Odor Frequency, Intensity, Duration and Offensiveness (FIDO) Chart Evaluation:

According to the FIDO protocol, the odor of garbage is characterized as "offensive" and the odor of landfill gas/leachate is characterized as "highly offensive". Landfill garbage and/or gas/leachate odors were previously detected coming from the direction of BRL on April 12 and 25, May 9, 15, 16, and 17, 2018. Therefore, the

BLUE RIDGE LANDFILL - FRESNO

6/13/2018 to 7/11/2018 Inv. # - 1497200

Page 4 of 4

frequency of odors documented by the investigator is a weekly occurrence.

CONCLUSION

According to FIDO protocol, nuisance odor conditions were not confirmed during the investigation conducted on June 13, 2018. The complaints are closed.

No Violations Associated to this Investigation

Signed 
Environmental Investigator

Date 7/18/18

Signed 
Supervisor

Date 07/18/2018

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) NO ACTION letter

Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ Notice of Registration

☒ Maps, Plans, Sketches

☐ Photographs

☐ Correspondence from the facility

☒ Other (specify) :

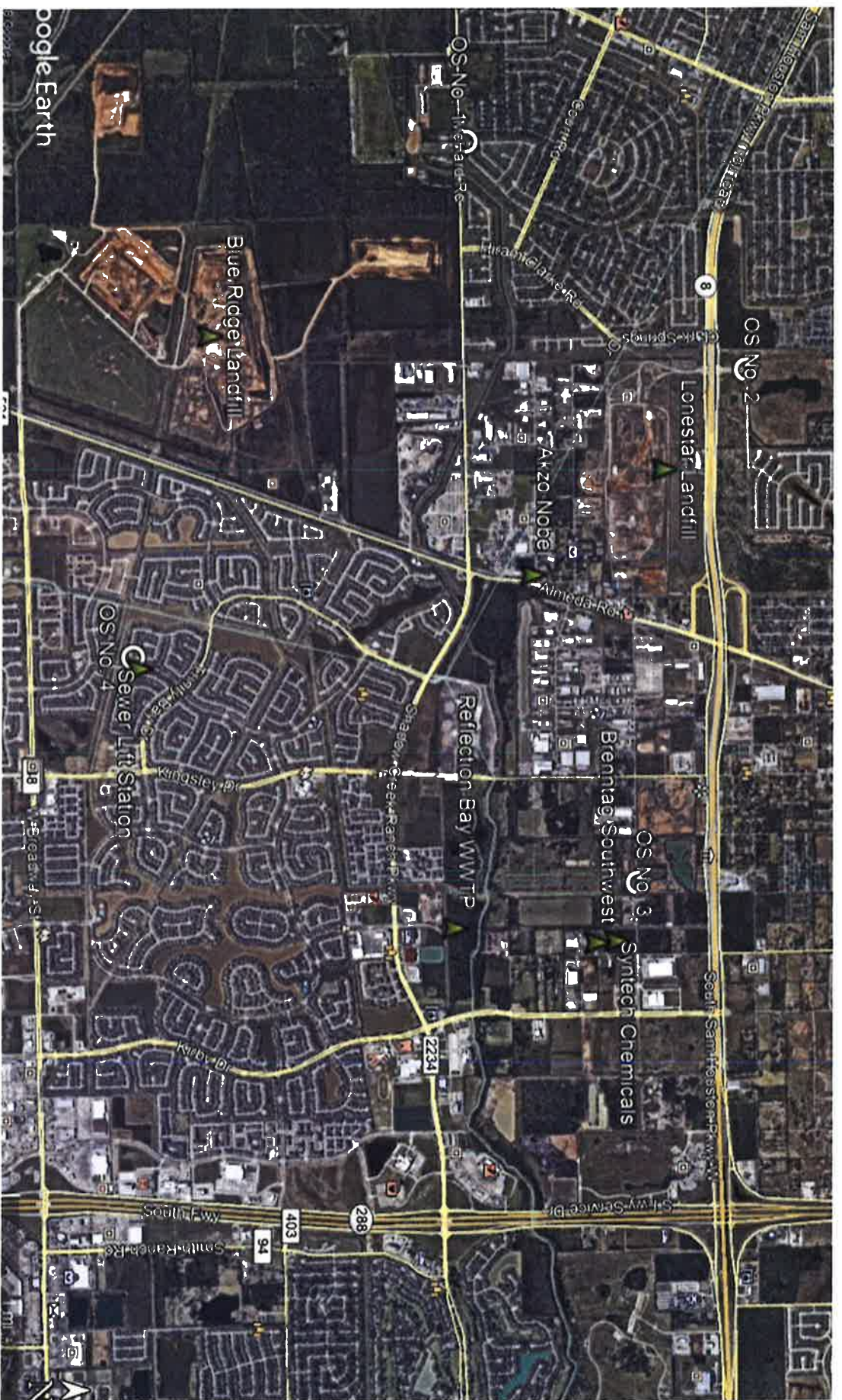
See list of attachments

**Blue Ridge Landfill
2200 F.M. 521, Fresno (Fort Bend County), TX 77545
Municipal Solid Waste Permit No. 1505A
MSW Complaint Investigation
Conducted on June 13, 2018**

List of Attachments

Attachment 1	Meteorological Information, Map of Odor Survey locations and Odor Logs
Attachment 2	May and June 2018 Cover Logs

ATTACHMENT 1



TCEQ Waste Section

June 13, 2018 Odor Surveys

Parameter Measured	Morning												Afternoon			Parameter Measured	POC
	Mid	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00	10:00	11:00	Noon	1:00	2:00		
Nitric Oxide	-0.1	0.0	-0.1	0.9	4.5	16.3	5.6	1.4	0.0	QAS	QAS	QAS	QAS	NA	NA	Nitric Oxide	1 MD
Nitrogen Dioxide	2.3	2.5	4.0	7.4	11.3	13.3	7.8	4.5	1.9	QAS	QAS	QAS	QAS	NA	NA	Nitrogen Dioxide	1 R MD
Oxides of Nitrogen	2.2	2.4	3.8	8.1	15.6	29.1	13.2	5.8	1.9	QAS	QAS	QAS	QAS	NA	NA	Oxides of Nitrogen	1 MD
Ozone	10	10	6	2	0	0	5	15	21	23	QAS	QAS	QAS	NA	NA	Ozone	1 R MD
Wind Speed	2.9	2.6	2.3	2.6	2.0	2.3	2.6	4.7	7.5	5.8	5.8	6.1	FEW	NA	NA	Wind Speed	1
Resultant Wind Speed	2.8	2.4	2.2	2.1	1.9	2.3	2.4	4.4	7.0	5.2	5.2	5.1	FEW	NA	NA	Resultant Wind Speed	1
Resultant Wind Direction	123	122	83	106	119	115	123	142	162	180	188	175	FEW	NA	NA	Resultant Wind Direction	1
Maximum Wind Gust	5.5	5.1	3.9	4.4	4.0	4.2	6.0	10.8	13.4	12.9	12.4	14.7	FEW	NA	NA	Maximum Wind Gust	1
Std. Dev. Wind Direction	12	20	17	35	19	13	22	19	20	25	25	32	FEW	NA	NA	Std. Dev. Wind Direction	1
Outdoor Temperature	76.6	76.4	75.9	75.4	75.5	76.0	78.5	82.2	85.2	87.1	88.8	90.5	FEW	NA	NA	Outdoor Temperature	1
Parameter Measured	Mid	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00	10:00	11:00	Noon	1:00	2:00	Parameter Measured	POC

Maximum values for each parameter are **bold** within the table. Minimum values are **bold**

italic.

R - Data from this instrument meets EPA quality assurance criteria for regulatory purposes.

PLEASE NOTE: This data has not been verified by the TCEQ and may change. This is the most current data, but it is not official until it has been certified by our technical staff. Data is collected from TCEQ ambient monitoring sites and may include data collected by other outside agencies. This data is updated hourly. All times shown are in local standard time unless otherwise indicated.

Following EPA reporting guidelines, negative values may be displayed in our hourly criteria air quality data, down to the negative of the EPA listed Method Detection Limit (MDL) for the particular instrument that made the measurements. The reported concentrations can be negative due to zero drift in the electronic instrument output, data logger channel, or calibration adjustments to the data. Prior to 1/1/2013, slightly negative values were automatically set to zero.

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Last Modified Tuesday, 30 Jan 2018

SSE

Supplemental Investigator's Odor Intensity Time Log

Investigator: Reyna Loosmore

Location: Intersection of McHard Rd &

Date of Investigation: June 13, 2018

Start Time: 0836 hrs

Amey
Ridgely Rd

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
15	No odor
16	
17	
18	
19	
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22	
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26	
27	
28	
29	
30	

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

Odor Description: _____

Offensiveness: Highly _____ Offensive _____ Unpleasant _____ Not Unpleasant _____

Weighted Average Intensity:

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

Supplemental Investigator's Odor Intensity Time Log

Investigator: Reyna Loosmore Location: Hiram Clarke Rd & Bellvue St
 Date of Investigation: June 13, 2018 Start Time: 0904h Address: Summerlyn Dr

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
15	No odor
16	
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18	
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27	
28	
29	
30	

Minutes	Odor Intensity VL, L, M, S, VS
31 min	
32	
33	
34	
35	
36	
37	
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41	
42	
43	
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58	
59	
60	

Odor Description: _____

Offensiveness: Highly _____ Offensive _____ Unpleasant _____ Not Unpleasant _____

Weighted Average Intensity:

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

Supplemental Investigator's Odor Intensity Time Log

Investigator: Reynold Loosmore Location: W. Riley Road 300 block
 Date of Investigation: June 13, 2018 Start Time: 0935 hrs

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No Odor
3	No Odor
4	No odor
5	No Odor
6	No odor
7	No odor
8	No Odor
9	No Odor
10	No Odor
11	No Odor
12	No Odor
13	No Odor
14	No odor
15	No odor
16	
17	
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26	
27	
28	
29	
30	

Minutes	Odor Intensity VL, L, M, S, VS
31 min	
32	
33	
34	
35	
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37	
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41	
42	
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57	
58	
59	
60	

Odor Description: _____

Offensiveness: Highly _____ Offensive _____ Unpleasant _____ Not Unpleasant _____

Weighted Average Intensity:

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

Supplemental Investigator's Odor Intensity Time Log

Investigator: Reyna Loosmore

Location: 2700 block of Autumn Falls Drive

Date of Investigation: June 13, 2018

Start Time: 1009 AM

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
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27	
28	
29	
30	

Minutes	Odor Intensity VL, L, M, S, VS
31 min	
32	
33	
34	
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41	
42	
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58	
59	
60	

Odor Description: _____

Offensiveness: Highly _____ Offensive _____ Unpleasant _____ Not Unpleasant _____

Weighted Average Intensity:

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

ATTACHMENT 2

COVER APPLICATION LOG

MSW

Month / Year: MAY 2018

Daily Cover 6" Soil	Approved Alternate Daily Cover Spray-On or Tarps			Elevation MSL	Inspection Date of Daily Cover	Erosion or Leachate Seepage Detected	Corrective Action	Soil Stockpile Required (yds ³)	Rain (inches)	Rain (inches) ≥ 0.5"	Intermediate Cover 12" Soil			Final Cover Per Final Closure Plan			Inspection Date of Daily Cover	Erosion Detected	Corrective Action	Final Cover Certification Report Reference	Supervisor Signature
	AMT ¹	Grid Area	Method ²								AMT ¹	Grid Area	Method ²	AMT ¹	Grid Area	Method ²					
1	1750	51-53	6"	85-87	✓												5-1-18	✓	3-2-6		
2	2750	51-53	6"	89-93	✓												5-2-18	✓	3-2-6		
3	3750	51-53	6"	93-97	✓												5-3-18	✓	3-2-6		
4	4750	51-53	6"	97-102	✓												5-4-18	✓	3-2-6		
5	5650	51-53	6"	102-104	✓																
6	7750	51-53	6"	104-108	✓																
7	8750	51-53	6"	108-112	✓																
8	9750	51-53	6"	112-116	✓																
9	10750	51-53	6"	116-120	✓																
10	11750	51-53	6"	120-125	✓																
11	12600	51-53	6"	125-127	✓																
12	13500	51-53	6"	127-131	✓																
13	14500	51-53	6"	131-135	✓																
14	15500	51-53	6"	135-139	✓																
15	16500	51-53	6"	139-143	✓																
16	17500	51-53	6"	143-147	✓																
17	18500	51-53	6"	147-151	✓																
18	19500	51-53	6"	151-155	✓																
19	20500	51-53	6"	155-159	✓																
20	21500	51-53	6"	159-163	✓																
21	22500	51-53	6"	163-167	✓																
22	23500	51-53	6"	167-171	✓																
23	24500	51-53	6"	171-175	✓																
24	25500	51-53	6"	175-179	✓																
25	26500	51-53	6"	179-183	✓																
26	27500	51-53	6"	183-187	✓																
27	28500	51-53	6"	187-191	✓																
28	29500	51-53	6"	191-195	✓																
29	30500	51-53	6"	195-199	✓																
30	31500	51-53	6"	199-203	✓																
31	32500	51-53	6"	203-207	✓																

AMT = Amount of cover (soil) in yds³ or alternate daily cover in bags or tarp area

T = Thickness in inches

Methods: A = Tarp Machine, B = Soil by Heavy Equipment, S = Spray-On

Inspect areas with daily cover or alternate daily cover each day the site is in operation and areas with intermediate and final cover weekly or within 72 hours of a rainfall event of 0.5" or more. Inspect all areas in accordance with Site Operating Plan Section 4.18. Additional documentation area on back of form.

Erosion of daily cover must be corrected within 24 hours after the area is accessible. Erosion of intermediate or final cover must be corrected within 5 days, attach documentation stating reasons for delay.

Corrective Action: R = Restoring cover material; G = Grading, M = Compacting; S = Seeding

SCOP Section 7.7.4 requires a soil stockpile to be maintained within 1,000 ft of the working face. The amount of soil required is dependent upon the maximum allocated size of the working face. A 50 yds³ soil stockpile is required within 100ft of the Regulated Asbestos-Containing Material (RACM) disposal area.

Signature certifies work accomplished as stated in the Cover Application Log.

1	Recessed & Graded to Repair Erosions Phase II North Slope 14-18, Phase I East Slope 23-25, West Slope West to Road 18-20, Phase I Sand Slope KK-NV
2	Recessed & Graded to Repair Erosions Phase II West Slope 21-27 & East Slope 10-T, Phase III East Slope 44-51 Phase III North Slope 16-UW
3	Recessed & Graded to Repair Erosions Phase III South Slope H-L Graded Phase III West Slope 41-51 Graded Phase III North Slope H-W
4	Graded to Repair Erosions Phase III North Slope W-DD
5	
6	
7	Graded to Repair Erosions Phase II Sand Slope F-L
8	Curve & Graded to Repair Locations from S.E.M. Findings on Phase III (1-11), N-12-31-40, U-X-38-39, NU-40-34-35, RK-40, CC-40 Phase I-S-13, T-15, X-4, II-8
9	Curve & Graded to Repair Locations from S.E.M. Findings Phase III S-4-40-40, O-A-73-44, L-42, I-45, O-Q-47-48, Y-II-48-50, II-51-52, FF-53, CC-53
10	Graded to Repair Erosions Phase III North Slope DD-SS
11	Graded to Repair Erosions Phase III South Slope L-V
12	
13	
14	
15	Graded to Repair Erosions Phase III AA-EE North Slope
16	Graded to Repair Erosions Phase III North Slope EE-JJ-
17	Graded to Repair Erosions Phase III East Slope 45-50
18	
19	
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21	
22	
23	
24	
25	
26	
27	
28	Graded to Repair Erosions Phase III North Slope JJ-DD
29	Graded to Repair Erosions Phase III North Slope DD-TT
30	Graded to Repair Erosions Phase III North Slope TT-YX
31	

Daily Cover		Approved Alternate Daily Cover				Elevation	Inspection Date of Daily Cover ⁴	Erosion or Leachate Seep Detected	Corrective Action ⁶	Soil Stockpile Required ⁷ (yd ³)	Rain (inches) ≥ 0.5"	Rain (inches) ≥ 0.5"	Intermediate Cover				Final Cover				Inspection Date of Intermediate & Final Cover ⁴	Erosion ≥ 4" Detected	Date Erosion Corrected ⁵	Corrective Action ⁶	Final Cover Certification Report Reference	Supervisor Signature ⁸	
AMT ¹	Grid Area	T ²	Method ³	Grid Area	T ²	Method ³	MSL	Yes			Yes	Yes	Grid Area	T ²	Method ³	Grid Area	T ²	Method ³	Grid Area	T ²	Method ³						
1	1750	44'-0" x 51'-0"	B	—	—	—	100-105	✓														✓	6-1-18	G		Ready Car	
2	650	44'-0" x 51'-0"	B	—	—	—	105-107	✓																		Ready Car	
3																											
4	750	44'-0" x 51'-0"	B	—	—	—	107-111	✓														✓	6-4-18	G		Ready Car	
5	750	44'-0" x 51'-0"	B	—	—	—	111-114	✓															6-5-18	G		Ready Car	
6	750	44'-0" x 51'-0"	B	—	—	—	114-117	✓															6-6-18	G		Ready Car	
7	750	44'-0" x 51'-0"	B	—	—	—	117-120	✓														✓	6-7-18	G		Ready Car	
8	750	44'-0" x 51'-0"	B	—	—	—	120-124	✓															6-8-18	G		Ready Car	
9	600	44'-0" x 51'-0"	B	—	—	—	108-110	✓			0.3												6-9-18	R+G		Ready Car	
10																											
11	750	44'-0" x 51'-0"	B	—	—	—	110-115	✓														✓	6-11-18	R+G		Ready Car	
12	750	44'-0" x 51'-0"	B	—	—	—	115-119	✓																6-12-18	R+G		Ready Car
13																											
14																											
15																											
16																											
17																											
18																											
19																											
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AMT = Amount of cover (soil) in yd³ or alternate daily cover in bags or tarp area

T = Thickness in inches

Methods: A = Tarp Machine, B = Soil by Heavy Equipment, S = Spray-On

Inspect areas with daily cover or alternate daily cover each day the site is in operation and areas with intermediate and final cover weekly or within 72 hours of a rainfall event of 0.5" or more. Inspect all areas in accordance with Site Operating Plan Section 4.18. Additional documentation area on back of form.

Erosion of daily cover must be corrected within 24 hours after the area is accessible. Erosion of intermediate or final cover must be corrected within 5 days of detection unless approved by TCEQ Regional Office. If not corrected within 5 days, attach documentation stating reasons for delay.

Corrective Action: R = Restoring cover material; G = Grading; M = Compacting; S = Seeding

SOP Section 7.74 requires a soil stockpile to be maintained within 1,000 ft of the working face. The amount of soil required is dependent upon the maximum anticipated size of the working face. A 50 yd³ soil stockpile is required within 100 ft of the Regulated Asbestos-Containing Material (RACM) disposal area.

Signature certifies work accomplished as stated in the Cover Application Log.

1	Graded to repair erosion Phase III west slope 41-47
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4	Graded to repair erosion Phase III west slope 47-52 Phase III north slope H-N
5	Graded to repair erosion Phase III north slope N-X
6	Graded to repair erosion Phase III north slope X-LL
7	Graded to repair erosion Phase III north slope LL-22
8	Graded to repair erosion Phase III south slope I-EE
9	Graded to repair erosion Phase III south slope EE-PP Recovered Phase III top deck RR-uvf 44-47
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11	Graded to repair erosion Phase III south slope PP-W + west slope 34-47 Recovered Phase III top deck RR-uvf 48-52
12	Graded to repair erosion Phase II west slope M-R Recovered Phase III top deck RR-RK-45-48
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