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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 9, 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.: 1500391


Dear Mr. Stengl:

The Texas Commission on Environmental Quality (TCEQ) Houston Region Office received on July 2, 3, 6, 9, 10, 11, 12, 13, 16, and 27, 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 July 12, 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,


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

ALJ/RLL/rsv

MSW PA_1505A_CP_20180712_Investigation
Texas Commission on Environmental Quality
Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

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

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

Investigation # 1500391

Incident Numbers

287872	287955
287871	287891
287919	287825
287959	287869
287884	287887
287786	287832
287920	287904
287960	287916
287863	287834
287894	287787
287925	287835
287900	287954
287827	287915
287892	287866
287788	287958
287889	287913
287917	287902
287895	287914
287829	287823
287921	287867
287890	287784
287790	287893
287885	287903
287896	287923
287858	287830

Investigator: REYNA LOOSMORE

Site Classification TYPE 1

Conducted: 07/12/2018 -- 07/23/2018

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): MSWCMP - Investigation of MSW
complaint

Principal(s):

Role

Name

RESPONDENT

BLUE RIDGE LANDFILL TX LP

BLUE RIDGE LANDFILL - FRESNO

7/12/2018 to 7/23/2018 Inv. # - 1500391

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Contact(s):

Role	Title	Name	Phone
PARTICIPATED IN	ENVIRONMENTAL MANAGER	MR BURGESS STENGL	Office (713) 676-7669
REGULATED ENTITY CONTACT	ENVIRONMENTAL MANAGER	MR BURGESS STENGL	Office (713) 676-7669
REGULATED ENTITY MAIL 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

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 July 2, 3, 6, 9, 10, 11, 12, 13, 16 and 27, 2018, the Texas Commission on Environmental Quality (TCEQ) Houston Region Office Waste Section received 96 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 July 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12, 2018.

On July 12, 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 in the surrounding area.

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 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

BLUE RIDGE LANDFILL - FRESNO

7/12/2018 to 7/23/2018 Inv. # - 1500391

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polychlorinated biphenyls, or untreated medical waste.

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

Complainant Information:

See confidential files (TCEQ Incident Nos. 287784, 287786, 287787, 287788, 287790, 287823, 287825, 287827, 287829, 287830, 287832, 287834, 287835, 287858, 287863, 287866, 287867, 287869, 287871, 287872, 287884, 287885, 287887, 287889, 287890, 287891, 287892, 287893, 287894, 287895, 287896, 287900, 287902, 287903, 287904, 287913, 287914, 287915, 287916, 287917, 287919, 287920, 287921, 287923, 287925, 287954, 287955, 287958, 287959, 287960, 287961, 287962, 287964, 287965, 288017, 288018, 288022, 288038, 288039, 288040, 288041, 288042, 288043, 288044, 288046, 288048, 288049, 288072, 288073, 288074, 288075, 288076, 288077, 288190, 288191, 288192, 288193, 288194, 288195, 288196, 288198, 288200, 288201, 288202, 288203, 288204, 288242, 288243, 288244, 288246, 288605, 288606, 288607, 289306, 289308 and 289567. Some of the incidents for this complaint are included in Data Maintenance File Review No. 1504250.

Description of Alleged Effects:

Nausea, headaches, dizziness, and irritation of the eyes were described as occurring because of the odors.

Meteorological data at the time of the odor survey:

Date: July 12, 2018

Wind Direction: southwest (SW) to south (S)

Wind Speed: average 4 mph

Outdoor Temperature: 85.6 – 88.9 °F

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

Odor Survey (OS):

The investigator conducted OS No. 1 at 9:18 a.m., downwind of BRL at the 2400 block of Lost Bridge Lane in Pearland. Garbage odors were intermittently detected during six (6) of the 23 minutes spent at OS No. 1, averaging to a very light intensity.

OS No. 2, located at the intersection of Golden Creek Lane and Shallow Falls Lane in Pearland and downwind of the Sewer Lift Station, was conducted at 9:53 a.m. No odors were detected during the 15 minutes spent at OS No. 2.

OS No. 3, located at the 14000 block of Almeda Road in Houston and crosswind of Lonestar Landfill, was conducted at 10:20 a.m. No odors were detected during the 15 minutes spent at OS No. 3.

OS No. 4, located at the intersection of FM 521 and Southbelt Industrial Drive in Pearland and downwind of Akzo Nobel Surface Chemistry (Akzo), was conducted at 10:38 a.m. No odors were detected during the 15 minutes spent at OS No. 4.

OS No. 5, located at the intersection of Kirby Drive and N. Spectrum Boulevard in Pearland and downwind of Brenntag Southwest/Syntech Chemicals, was conducted at 11:02 a.m. Fishy odors were intermittently detected during four (4) of the 15 minutes spent at OS No. 5, averaging to a very light intensity.

OS No. 6, located at the intersection of Kirby Drive and Fruge Road in Pearland and crosswind of the Reflection Bay Wastewater Treatment Plant (WWTP), was conducted at 11:38 a.m. No odors were detected during the 15 minutes spent at OS No. 6.

BLUE RIDGE LANDFILL - FRESNO

7/12/2018 to 7/23/2018 Inv. # - 1500391

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An aerial view map of the OS location and the OS log 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. Burgess Stengl, Environmental Manager, to whom the purpose and scope of the investigation were explained.

Six inches of soil is applied at the end of each operating day to the Class 1 and MSW working faces. The facility representatives drove the investigator to the MSW and Class 1 working faces, by which piles of soil were observed. No erosion was observed on the slopes of the landfill during the investigation. The investigator obtained a copy of the MSW and Class 1 cover logs from July 1 to July 11, 2018 (Attachment 2). The cover logs indicated that soil is applied to the working faces as required.

Description of Odor:

Garbage and fishy 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:

While off-site, the investigator detected odors from the directions of BRL and Brenntag Southwest/Syntech Chemicals.

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

According to the FIDO protocol, the odor of landfill garbage is characterized as "offensive", the odor of landfill gas/leachate is characterized as "highly offensive", and fishy odor is characterized as "highly offensive". Landfill garbage and/or gas/leachate odors were previously detected coming from the direction of BRL on April 25, May 9, 15, 16, and 17 and June 28, 2018. Therefore, the frequency of odors documented by the investigator is a monthly occurrence.

CONCLUSION

According to FIDO protocol, nuisance odor conditions were not confirmed during the investigation conducted on July 12, 2018. The complaints are closed.

No Violations Associated to this Investigation

Signed 
Environmental Investigator

Date 8/9/18

Signed Alma L. Jefferson
Supervisor

Date 08/09/2018

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type): Notice of Action

☐ Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ Notice of Registration

☒ Maps, Plans, Sketches

☐ Photographs

☐ Correspondence from the facility

☒ Other (specify):

See list of Attachments

Texas Commission on Environmental Quality Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

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

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

Investigation # 1504250

Incident Numbers

288017	287962
288605	288077
288048	288607
288040	288192
288204	288195
288200	288073
288194	288242
288049	287964
288044	288074
288246	288201
288041	288018
288076	288038
287965	288190
288191	288243
289567	288196
288042	288046
288202	288022
287961	288193
289306	288039
288606	288075
288203	288043
288072	288244
289308	288198

Investigator: REYNA LOOSMORE

Site Classification TYPE 1

Conducted: 07/12/2018 -- 07/23/2018

NAIC Code: 562212

NAIC Code: 486210

SIC Code: 4922

SIC Code: 4953

SIC Code: 1521

Program(s): MUNICIPAL SOLID WASTE DISPOSAL

Investigation Type: Data Maintenance File Review

Location: LOCATED ON 2200 FM 521

Additional ID(s): 1505A

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

Local Unit:
Activity Type(s):

Principal(s):

Role

Name

RESPONDENT

BLUE RIDGE LANDFILL TX LP

Contact(s):

BLUE RIDGE LANDFILL - FRESNO

7/12/2018 to 7/23/2018 Inv. # - 1504250

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Role	Title	Name	Phone
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Other Staff Member(s):

Role	Name
Supervisor	ALMA JEFFERSON

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
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Investigation Comments:

This Data Maintenance File Review was created to associate additional incidents for Investigation No. 1500391.

No Violations Associated to this Investigation

Signed


Environmental Investigator

Date

8/9/18

Signed


Supervisor

Date

08/09/2018

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ Maps, Plans, Sketches

___ Letter to Facility (specify type) : _____

___ Photographs

___ Investigation Report

___ Correspondence from the facility

___ Sample Analysis Results

___ Other (specify) : _____

___ Manifests

___ Notice of Registration

**Blue Ridge Landfill
2200 F.M. 521, Fresno (Fort Bend County), TX 77545
Municipal Solid Waste Permit No. 1505A
MSW Complaint Investigation
Conducted on July 12, 2018**

List of Attachments

Attachment 1: Meteorological Information, Map of Odor Survey locations and Odor Logs

Attachment 2: July 2018 Cover Logs

ATTACHMENT 1

The table below contains hourly averages for all the pollutants and meteorological conditions measured at Manvel Croix Park C84 for **Thursday, July 12, 2018**. All times shown are in CST.

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



TCEQ Waste Section

July 12, 2018 Odor Surveys

Supplemental Investigator's Odor Intensity Time Log

Investigator: Reynold Loosmore
Date of Investigation: July 12, 2018

Location: 2400 block of Lost Bridge Ln
Start Time: 0918 hrs

Minutes	Odor Intensity VL, L, M, S, VS
1 min	VL
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	VL
8	L
9	L
10	VL
11	No odor
12	No Odor
13	VL
14	No odor
15	No Odor
16	No odor
17	No odor
18	No odor
19	No Odor
20	No odor
21	No odor
22	No odor
23	No odor
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Minutes	Odor Intensity VL, L, M, S, VS
31 min	
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Odor Description: Garbage

Offensiveness: Highly _____ Offensive ☒ Unpleasant _____ Not Unpleasant _____

Weighted Average Intensity: 3.4

	VS	S	M	L	(VL)	No Odor
1 Min				2 x 2 = 4	4 x 1 = 4	
10 Min						
1 Hour						

Supplemental Investigator's Odor Intensity Time Log

Investigator: Keynd Loomore
Date of Investigation: July 12, 2018

Location: Intersection of Golden Creek Ln & Shallow Falls Ln
Start Time: 0953 h

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
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Minutes	Odor Intensity VL, L, M, S, VS
31 min	
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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
Date of Investigation: July 12, 2018

Location: 14000 back of Armerda Road
Start Time: 10:20 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
14	No Odor
15	No Odor
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Minutes	Odor Intensity VL, L, M, S, VS
31 min	
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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
 Date of Investigation: July 12, 2018

Location: Intersection of FM 521 & Sumbert Industrial Dr.
 Start Time: 1038 hr

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
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Minutes	Odor Intensity VL, L, M, S, VS
31 min	
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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
Date of Investigation: July 12, 2018

Location: near intersection of Kirby Drive & N. Spectrum Blvd
Start Time: 1102 HD

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	L
4	L
5	VL
6	VL
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
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Minutes	Odor Intensity VL, L, M, S, VS
31 min	
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Odor Description: Fishy

Offensiveness: Highly ☒ Offensive _____ Unpleasant _____ Not Unpleasant _____

Weighted Average Intensity: 4

	VS	S	M	L	VL	No Odor
1 Min				2 x 2 = 4	2 x 1 = 2	
10 Min						
1 Hour						

Supplemental Investigator's Odor Intensity Time Log

Investigator: Rayna Lonsmire
 Date of Investigation: July 17, 2018

Location: Intersection of Kirby Drive & Trude Rd
 Start Time: 1135H

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
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Minutes	Odor Intensity VL, L, M, S, VS
31 min	
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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: July 2018

Daily Cover	Approved Alternate Daily Cover	Elevation	Date of Daily Cover ¹	Erosion or Seep Detected ²	Date Erosion or Seep Corrected ³	Corrective Action ⁴	Soil Stockpile Required ⁵ (yd ³)	Rain (inches) ≥ 0.5"	Intermediate Cover	Final Cover	Inspection Date of Daily & Final Cover ⁶	Erosion or Seep Detected ⁷	Date Erosion Corrected ⁸	Corrective Action ⁹	Final Cover Certification Report Reference	Supervisor Signature ¹⁰
6" Soil	Spray-On or Taps	MSL	Inspected	Yes	Corrected			Yes	12" Soil	Per Final Closure Plan	Inspected	Yes				
AMT ¹¹	Grid Area	T ¹²	Method ¹³						AMT ¹⁴	Grid Area	T ¹⁵	Method ¹⁶				
1	250	45-50	6"	U												
2	250	45-50	6"	U												
3	250	45-50	6"	U												
4	250	45-50	6"	U												
5	250	45-50	6"	U												
6	250	45-50	6"	U												
7	250	45-50	6"	U												
8	250	45-50	6"	U												
9	250	45-50	6"	U												
10	250	45-50	6"	U												
11	250	45-50	6"	U												
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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 7.24 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 100ft of the Regulated Asbestos-Containing Material (RACM) disposal area.
Signature certifies work accomplished as stated in the Cover Application Log.

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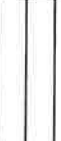
























COVER APPLICATION LOG CLASS I NON HAZARDOUS

Class 1

Month / Year: *July 2018*

Daily Cover 6" Soil	Approved Alternate Daily Cover Spray-On or Tarps				Elevation MSL	Inspection Date of Daily Leachate Cover ¹	Erosion or Leachate Seep Detected ²	Date Erosion or Leachate Seep Corrected ³	Corrective Action ⁴ Required ⁵ (yd ³)	Soil Stockpile Required ⁶ (inches)	Rain (inches) ≥ 0.5"	Rain (inches) ≥ 0.5"	Intermediate Cover 12" Soil				Final Cover Per Final Closure Plan				Inspection Date of Intermediate & Final Cover ⁷	Erosion ≥ 4" Detected	Date Erosion Corrected ³	Corrective Action ⁴	Final Cover Certification Report Reference	Supervisor Signature ⁸			
	Grid Area	T ¹	Method ²	AMT ³									Grid Area	T ¹	Method ²	AMT ³	Grid Area	T ¹	Method ²	AMT ³							Grid Area	T ¹	Method ²
1																													
2	500 E-30	6"	B	-	-	40'	✓																						
3	500 E-30	6"	B	-	-	42'	✓																						
4	500 E-30	6"	B	-	-	44'	✓																						
5	500 E-30	6"	B	-	-	46'	✓																						
6	500 E-30	6"	B	-	-	48'	✓																						
7																													
8																													
9	500 E-30	6"	B	-	-	50'	✓																						
10	500 E-30	6"	B	-	-	52'	✓																						
11	500 E-30	6"	B	-	-	54'	✓																						
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AMT = Amount of cover (soil) in yd³ or alternate daily cover in bags or tarp area



AMT = Amount of cover (soil) in yd³ or alternate daily cover in bags or tarp area

T = Thickness in inches

Methods: A = Trap 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 7.7.4 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 anticipated size of the working face. A 50 yd³ 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.

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