

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Stephanie Bergeron Perdue, *Interim Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

July 17, 2018

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

Re: Compliance Schedule Evaluation for the Revised Odor Control Plan at:  
Blue Ridge Landfill, 2200 FM 521 Road, Fresno (Fort Bend County), Texas 77545  
TCEQ MSW Permit No.: 1505A

Dear Mr. Stengl:

On June 13, 2018, Ms. Reyna Loosmore of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with the Revised Odor Control Plan approved on April 10, 2018 and submitted for compliance with TCEQ Agreed Order Docket No. 2016-1923-AIR-E Ordering Provision (OP) No. 3.e. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Loosmore in the Houston Region Office at (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**

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

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

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

<b>Investigation #</b> 1504264	<b>Incident Numbers</b>
<b>Investigator:</b> REYNA LOOSMORE	<b>Site Classification</b> TYPE 1
<b>Conducted:</b> 06/13/2018 -- 07/17/2018	<b>NAIC Code:</b> 562212 <b>NAIC Code:</b> 486210 <b>SIC Code:</b> 4922 <b>SIC Code:</b> 4953 <b>SIC Code:</b> 1521
<b>Program(s):</b> MUNICIPAL SOLID WASTE DISPOSAL	
<b>Investigation Type:</b> Compliance Investigation	<b>Location:</b> LOCATED ON 2200 FM 521
<b>Additional ID(s):</b> 1505A	
<b>Address:</b> 2200 FM 521 RD, FRESNO, TX , 77545	<b>Local Unit:</b> REGION 12 - HOUSTON <b>Activity Type(s):</b> MSWCSE - On-site followup investigation

**Principal(s):**

<b>Role</b>	<b>Name</b>
RESPONDENT	BLUE RIDGE LANDFILL TX LP

**Contact(s):**

<b>Role</b>	<b>Title</b>	<b>Name</b>	<b>Phone</b>
PARTICIPATED IN	DIVISION MANAGER	MR MARK MEADOWS	Phone (281) 668-9739
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
REGULATED ENTITY CONTACT	ENVIRONMENTAL MANAGER	MR BURGESS STENGL	Office (713) 676-7669

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**Other Staff Member(s):**

<b>Role</b>	<b>Name</b>
QA Reviewer	BETHANY BATCHELOR
Supervisor	ALMA JEFFERSON

**Associated Check List**

<b><u>Checklist Name</u></b>	<b><u>Unit Name</u></b>
MSW GENERIC OTHER ISSUES OR VIOLATIONS	1505A Generic

**Investigation Comments:**

**INTRODUCTION**

On June 13, 2018, Ms. Reyna L. Loosmore, Environmental Investigator of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office, conducted a Municipal Solid Waste (MSW) Compliance Schedule Evaluation (CSE) at Blue Ridge Landfill (BRL) to evaluate compliance with the Revised Odor Control Plan approved on April 10, 2018 and submitted for compliance with TCEQ Agreed Order Docket No. 2016-1923-AIR-E Ordering Provision (OP) No. 3.e. The facility is located at 2200 FM 521 Rd (Fort Bend County), Texas 77545. The investigation involved an opening conference, records review and a site investigation.

**BACKGROUND**

A Notice of Enforcement (NOE) 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's Odor Control Plan thus requiring BRL to implement all provisions of the plan in accordance with the approved schedule (Attachment 1).

**GENERAL FACILITY AND WASTE PROCESS INFORMATION**

BRL is a Type I landfill which is authorized to operate by TCEQ Municipal Solid Waste (MSW) Permit No. 1505A. The surrounding land use includes industrial facilities and residential subdivisions.

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 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.

**SITE INVESTIGATION**

Upon arrival to the site, the investigator 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.

During the investigation, BRL provided documentation indicating that the Odor Control Plan Schedule was being followed. The documentation provided during the investigation included the following: a copy of a complaint received via the odor complaint website, dated May 5, 2018, demonstrating that the complaint website had been activated; a copy of an information report, dated May 2, 2018, posted on their website communicating to the public the availability of the 24-hour Odor Complaint Hotline/Message-line and website complaint system; and documentation dated April 26, May 18, 19, and 22, 2018, demonstrating that the 24-hour Fence Line Monitoring was activated before May 22, 2018. Additionally, during the site investigation, the investigator observed the dual carbon canisters in place and information regarding the Complaint Hotline/Message-line posted on the front gate. Documentation provided and photographs taken during the investigation are included in Attachment 2.

On June 15, 2018, the TCEQ Houston Region Office sent BRL an Exit Interview Form (Attachment 3) requesting

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documentation regarding the implementation of the Odor Control Plan. BRL's response to the Exit Interview Form is further discussed in the Additional Information Section of this report.

### ADDITIONAL INFORMATION

On June 1, 2018, the TCEQ Houston Region Office received documentation from BRL, dated June 1, 2018, regarding the Odor Control Plan Implementation Schedule (Attachment 4). The documentation submitted included the following information: Surface Emission Monitoring data demonstrating that monitoring began before the implementation deadline of January 1, 2017; Odor Complaint Forms dated May 7 and 8, 2018 demonstrating that the 24-hour hotline/message line is operational; a photograph of the dual carbon canisters dated April 24, 2018 demonstrating that they have been installed before the implementation deadline of May 1, 2018; a statement regarding the TCEQ-BRL Semi-Annual Meeting to be held semi-annually; and an e-mail as evidence that the 24-Hour Fence Line Monitoring system had begun prior to the implementation deadline of May 22, 2018.

On June 11, 2018, the TCEQ Houston Region Office received documentation from BRL, dated June 8, 2018, regarding the Odor Control Plan Implementation Schedule. The implementation schedule requires BRL to incorporate the approved Odor Plan into the Part IV-Site Operating Plan, Operating Procedures, 4.10 Air Quality and Odor Management Plan in the MSW Permit No. 1505A. By letter dated June 8, 2018 (Attachment 4), BRL submitted the required permit modification to the TCEQ MSW Permits Section in Austin, Texas. Written documentation certifying that the permit modification application had been submitted to the TCEQ MSW Permits Section in Austin, Texas was received from BRL on June 28, 2018 (Attachment 4).

On June 29, 2018, the TCEQ Houston Region Office received documentation from BRL, dated June 28, 2018, regarding the Exit Interview Form sent to the facility on June 15, 2018 (Attachment 5). The documentation included a computer screenshot from BRL's vendor stating that the Odor Complaint website has been working since January 31, 2017.

### SUMMARY OF INVESTIGATION FINDINGS

The findings of the investigation were documented on "TCEQ Exit Interview Form: Potential Violations and/or Records Requested" (TCEQ-20085) sent to the facility via e-mail on June 15, 2018 (Attachment 5).

BRL has addressed the following provisions of the Odor Control Plan in accordance to the approved schedule, as required by TCEQ Agreed Order Docket No. 2016-1923-AIR-E OP No. 3.e., based on documentation received from the facility on June 1, 11, 13, 28 and 29, 2018.

1. BRL was required to implement surface emissions monitoring (SEM), reporting procedures and protocols beginning January 1, 2017.

This item was addressed based on documentation received from the facility on June 1, 2018, which indicated that the SEM had been implemented beginning January 1, 2017.

2. BRL was required to activate a 24-hour Odor Complaint Hotline/Message-line and web-site within three (3) weeks after the Executive Director (ED) approval of the Plan (May 1, 2018).

This item was addressed based on documentation received from the facility on June 1, 13 and 29, 2018, which indicated that the 24-hour Odor Complaint Hotline/Message-line had been activated by May 1, 2018.

3. BRL was required to install dual carbon canisters within three (3) weeks after the ED approval of the Plan (May 1, 2018).

This item was addressed based on documentation received from the facility on June 1, 2018 and photographic documentation taken on June 13, 2018, which indicated the canisters were installed by May 1, 2018.

4. BRL was required to communicate to the public via the facility's website and on the facility's front gate the availability of the 24-hour Odor Complaint Hotline/Message-line and website by May 1, 2018.

This item was addressed based on documentation received from the facility on June 1 and 29, 2018 and

**BLUE RIDGE LANDFILL - FRESNO**

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photographic documentation taken on June 13, 2018, which indicated that the information had been communicated to the public by May 1, 2018.

5. BRL was required to begin 24-hour Fence Line Monitoring within six (6) weeks after the ED approval of the Plan (May 22, 2018).

This item was addressed based on documentation received from the facility on June 1 and 13, 2018, which indicated that the 24-hour Fence Line Monitoring began by May 22, 2018.

6. BRL was required to submit a permit modification application incorporating the approved Odor Plan into the Part IV-Site Operating Plan, Operating Procedures, 4.10 Air Quality and Odor Management Plan in the MSW Permit No. 1505A within 60 days after the ED approval of the Plan (June 9, 2018).

This item was addressed based on documentation received from the facility on June 11, 2018, which indicated that the facility had submitted the required permit modification to the TCEQ MSW Permits Section in Austin, Texas by June 9, 2018.

7. BRL was required to provide written certification to confirm that the permit modification application was submitted within 75 days after the ED approval of the Plan (June 24, 2018).

This item was addressed based on documentation received from the facility on June 28, 2018, which demonstrated that the facility had submitted the permit modification application by June 24, 2018.

**No Violations Associated to this Investigation**

Signed   
Environmental Investigator

Date 7/17/18

Signed Alma L. Jefferson  
Supervisor

Date 07/17/2018

**Attachments: (in order of final report submittal)**

Enforcement Action Request (EAR)

Letter to Facility (specify type) : GC

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 Compliance Schedule Evaluation  
Conducted on June 13, 2018**

**LIST OF ATTACHMENTS**

**Attachment 1:** Odor Control Plan Approval Letter and Implementation Schedule

**Attachment 2:** Documentation Received from Facility on June 13, 2018 and Photographic Documentation

**Attachment 3:** Exit Interview Form

**Attachment 4:** Correspondence Received from Facility on June 1, 11 and 28 2018

**Attachment 5:** Correspondence Received from Facility on June 29, 2018





# ATTACHMENT 1



Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Stephanie Bergeron Perdue, *Interim Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

April 10, 2018

Mr. Brandon Rogers, General Manager  
Blue Ridge Landfill TX, LP  
P.O. Box 879  
Fresno, Texas 77545-0879

Re: Response to the Revised Odor Control Plan ("the Plan") Submitted for Compliance with Ordering Provisions of TCEQ Agreed Order Docket No. 2016-1923-AIR-E Case No. 53555; Blue Ridge Landfill TX, LP; RN102610102 Agreed Order Effective Date: July 12, 2017

Dear Mr. Rogers:

The Executive Director of the Texas Commission on Environmental Quality ("Executive Director") received your letter dated April 5, 2018 containing the Plan required by the Ordering Provisions ("OP") of the above referenced Order. This submittal was a revision to Plans that were previously submitted on August 11, 2017, November 30, 2017, January 18, 2018, and March 8, 2018. These revisions were based on discussions and meetings between the Executive Director and Blue Ridge Landfill TX, LP.

The Executive Director has reviewed the Plan submitted on April 5, 2018 and has determined that Blue Ridge Landfill TX, LP has met the requirements of OP No. 3.b. and that the Plan is hereby **approved**. In addition, the Executive Director **approves** Attachment 1 ("Blue Ridge Landfill Odor Control Plan Implementation Schedule") of your April 5, 2018 letter. Blue Ridge Landfill TX, LP is now required to implement all provisions of the Plan in accordance with the approved schedule, as required by OP No. 3.e.

Additionally, Blue Ridge Landfill TX, LP must comply with all the OPs in Section IV. of the Order, within the timeframes specified therein.

If you have any questions or need further assistance, please contact Mr. Rajesh Acharya of my staff at (512) 239-0577.

A handwritten signature in cursive script that reads "Bryan Sinclair".

Sincerely,

Bryan Sinclair, Director  
Enforcement Division

### BRLF Odor Control Plan Implementation Schedule

Action(s)	Due Date
Beginning January 1, 2017, surface emissions monitoring (SEM), reporting procedures and protocols were implemented as outlined in Appendix 10.	1/1/2017
Within three weeks after Executive Director (ED) approval of the Plan, the 24-hour Odor Complaint Hotline/Message-line and web-site will be activated.	5/1/2018
Within three weeks after ED approval of the Plan, the dual carbon canister will be installed.	5/1/2018
Once the 24-hour Odor Complaint Hotline/Message-line and website are activated, the availability of these resources will be communicated to the public via our website and will be posted on the front gate.	5/1/2018
Within six weeks after ED approval of the Plan, 24-hour fence line monitoring will begin for a five year period.	5/22/2018
Within 60 days after ED approval of the Plan, a permit modification application will be submitted to incorporate the approved Plan into the Part IV-Site Operating Plan, Operating Procedures, 4.10 Air Quality and Odor Management Plan in Municipal Solid Waste Permit No. 1505A.	6/9/2018
Within 75 days after ED approval of the Plan, a written certification will be submitted to confirm compliance that the permit modification application was submitted	6/24/2018
Following approval of Plan, SEM will be conducted bimonthly (one occurrence every two months) for two years after which SEM will be quarterly.	6/30/2018
A meeting between TCEQ and BRLF Management Team will be held semi-annually to discuss BRLF odor management progress.	6/30/2018
Within 30 days after completion of the approved Plan implementation, a written certification will be submitted to document that the Plan has been implemented in accordance with the approved schedule.	7/30/2018
Within 240 days after ED approval of the Plan, a written certification will be submitted that the permit modification has been obtained, and will include detailed supporting documentation including photographs, receipts, and/or other records.	12/6/2018
A meeting between TCEQ and BRLF Management Team will be held semi-annually to discuss BRLF odor management progress.	12/31/2018

# ATTACHMENT 2





## Blue Ridge Landfill and TCEQ Reach Agreement to Enhance Odor Monitoring and Reporting

May 2, 2018



**FRESNO, TX (May 2, 2018)** – Last month, Blue Ridge Landfill and the Texas Commission on Environmental Quality (TCEQ) reached an agreement to, among other actions, conduct enhanced odor monitoring and reporting and provide additional odor reporting options for the community. Specifically, we agreed to:

- Adopt additional surface emissions monitoring (SEM) routines, reporting procedures, and protocols;
- Conduct SEM bi-monthly for two years, after which we will be conducted quarterly;
- Advertise and activate a 24-hour odor reporting hotline and an online odor reporting function in May;
- Install a dual carbon canister system to control potential leachate odors;
- Hold semi-annual meetings with TCEQ leadership to review odor management progress; and
- Conduct 24-hour fence line monitoring for five years.

We appreciate the TCEQ's partnership in reaching this agreement and look forward to continuing to work together. We will keep you updated on the progress we make this year.





If you have questions or would like to learn more, please visit us online at [http://  
blueridgelandfill.com/](http://blueridgelandfill.com/)



24-Hr Fenceline  
monitoring

Equipment number	CHM0100003167		Life(%)	41
Time	Eq. H2S (TRS) Level (ppb)	Bat.(mV)	Temp. °C	Humidity %
4/26/2018 9:45:00 AM	9	4180	13	67
4/26/2018 10:00:00 AM	9	4180	13	68
4/26/2018 10:15:00 AM	10	4180	13	67
4/26/2018 10:30:00 AM	9	4180	14	65
4/26/2018 10:45:00 AM	7	4180	16	60
4/26/2018 11:00:00 AM	7	4180	17	56
4/26/2018 11:15:00 AM	7	4180	18	54
4/26/2018 11:30:00 AM	7	4180	18	53
4/26/2018 11:45:00 AM	7	4180	19	52
4/26/2018 12:00:00 PM	6	4180	20	50
4/26/2018 12:15:00 PM	6	4180	21	48
4/26/2018 12:30:00 PM	6	4180	21	47
4/26/2018 12:45:00 PM	5	4180	21	45
4/26/2018 1:00:00 PM	5	4180	22	44
4/26/2018 1:15:00 PM	5	4180	22	43
4/26/2018 1:30:00 PM	4	4180	23	42
4/26/2018 1:45:00 PM	4	4180	23	42
4/26/2018 2:00:00 PM	4	4180	23	41
4/26/2018 2:15:00 PM	5	4180	24	41
4/26/2018 2:30:00 PM	4	4180	23	41
4/26/2018 2:45:00 PM	4	4180	24	41
4/26/2018 3:00:00 PM	3	4180	24	40
4/26/2018 3:15:00 PM	4	4180	24	40
4/26/2018 3:30:00 PM	3	4180	25	40
4/26/2018 3:45:00 PM	3	4180	25	39
4/26/2018 4:00:00 PM	3	4180	25	39
4/26/2018 4:15:00 PM	2	4180	26	38
4/26/2018 4:30:00 PM	4	4180	25	38
4/26/2018 4:45:00 PM	2	4180	26	37
4/26/2018 5:00:00 PM	3	4180	25	36
4/26/2018 5:15:00 PM	4	4180	25	37
4/26/2018 5:30:00 PM	4	4180	25	38
4/26/2018 5:45:00 PM	4	4180	25	37
4/26/2018 6:00:00 PM	4	4180	25	37
4/26/2018 6:15:00 PM	4	4180	25	38
4/26/2018 6:30:00 PM	4	4180	24	38
4/26/2018 6:45:00 PM	6	4180	24	40
4/26/2018 7:00:00 PM	6	4180	24	40
4/26/2018 7:15:00 PM	7	4180	24	42
4/26/2018 7:30:00 PM	10	4180	22	46
4/26/2018 7:45:00 PM	12	4180	20	52
4/26/2018 8:00:00 PM	12	4180	18	55
4/26/2018 8:15:00 PM	15	4180	17	64
4/26/2018 8:30:00 PM	12	4180	15	65
4/26/2018 8:45:00 PM	9	4180	15	63

RECEIVED  
6/13/18



Equipment number	CHM0100003117			Life(%)	41
Time	Eq. H2S (TRS) Level (ppb)	Bat.(mV)	Temp. °C	Humidity %	
4/26/2018 9:30:00 AM	24	4180	19	56	
4/26/2018 9:45:00 AM	27	4180	20	55	
4/26/2018 10:00:00 AM	26	4180	21	52	
4/26/2018 10:15:00 AM	27	4180	22	49	
4/26/2018 10:30:00 AM	27	4180	23	48	
4/26/2018 10:45:00 AM	27	4180	24	46	
4/26/2018 11:00:00 AM	27	4180	25	44	
4/26/2018 11:15:00 AM	27	4180	26	43	
4/26/2018 11:30:00 AM	28	4180	26	43	
4/26/2018 11:45:00 AM	28	4180	27	41	
4/26/2018 12:00:00 PM	28	4180	26	41	
4/26/2018 12:15:00 PM	27	4180	27	40	
4/26/2018 12:30:00 PM	27	4180	27	40	
4/26/2018 12:45:00 PM	26	4180	28	39	
4/26/2018 1:00:00 PM	26	4180	29	37	
4/26/2018 1:15:00 PM	28	4180	29	37	
4/26/2018 1:30:00 PM	28	4180	28	38	
4/26/2018 1:45:00 PM	25	4180	30	36	
4/26/2018 2:00:00 PM	26	4180	30	36	
4/26/2018 2:15:00 PM	27	4180	30	36	
4/26/2018 2:30:00 PM	27	4180	30	35	
4/26/2018 2:45:00 PM	27	4180	30	35	
4/26/2018 3:00:00 PM	28	4180	30	36	
4/26/2018 3:15:00 PM	26	4180	30	36	
4/26/2018 3:30:00 PM	27	4180	30	35	
4/26/2018 3:45:00 PM	28	4180	29	36	
4/26/2018 4:00:00 PM	27	4180	28	37	
4/26/2018 4:15:00 PM	28	4180	27	39	
4/26/2018 4:30:00 PM	27	4180	25	39	
4/26/2018 4:45:00 PM	27	4180	24	41	
4/26/2018 5:00:00 PM	26	4180	24	41	
4/26/2018 5:15:00 PM	27	4180	23	43	
4/26/2018 5:30:00 PM	26	4180	23	44	
4/26/2018 5:45:00 PM	26	4180	22	44	
4/26/2018 6:00:00 PM	25	4180	22	44	
4/26/2018 6:15:00 PM	26	4180	22	45	
4/26/2018 6:30:00 PM	28	4180	21	48	
4/26/2018 6:45:00 PM	26	4180	21	49	
4/26/2018 7:00:00 PM	26	4180	20	49	
4/26/2018 7:15:00 PM	27	4180	20	51	
4/26/2018 7:30:00 PM	27	4180	19	51	
4/26/2018 7:45:00 PM	29	4180	19	56	
4/26/2018 8:00:00 PM	32	4180	18	62	
4/26/2018 8:15:00 PM	32	4180	17	65	
4/26/2018 8:30:00 PM	34	4180	16	67	



Equipment number	CHM0100003116			Life(%)	41
Time	Eq. H2S (TRS) Level (ppb)	Bat.(mV)	Temp. °C	Humidity %	
4/26/2018 9:30:00 AM	18	4260	22	46	
4/26/2018 9:45:00 AM	18	4720	22	44	
4/26/2018 10:00:00 AM	18	5000	23	42	
4/26/2018 10:15:00 AM	18	5000	24	41	
4/26/2018 10:30:00 AM	17	5000	25	39	
4/26/2018 10:45:00 AM	19	5000	25	39	
4/26/2018 11:00:00 AM	20	5000	24	39	
4/26/2018 11:15:00 AM	18	5000	25	38	
4/26/2018 11:30:00 AM	18	5000	26	37	
4/26/2018 11:45:00 AM	16	5000	26	36	
4/26/2018 12:00:00 PM	15	5000	27	35	
4/26/2018 12:15:00 PM	16	5000	27	35	
4/26/2018 12:30:00 PM	16	5000	26	35	
4/26/2018 12:45:00 PM	13	5000	27	34	
4/26/2018 1:00:00 PM	13	5000	27	33	
4/26/2018 1:15:00 PM	14	5000	26	34	
4/26/2018 1:30:00 PM	12	5000	27	33	
4/26/2018 1:45:00 PM	13	5000	27	34	
4/26/2018 2:00:00 PM	15	5000	27	35	
4/26/2018 2:15:00 PM	10	5000	28	33	
4/26/2018 2:30:00 PM	12	5000	27	34	
4/26/2018 2:45:00 PM	11	5000	27	34	
4/26/2018 3:00:00 PM	10	5000	27	33	
4/26/2018 3:15:00 PM	10	5000	27	33	
4/26/2018 3:30:00 PM	10	5000	28	32	
4/26/2018 3:45:00 PM	9	5000	28	32	
4/26/2018 4:00:00 PM	9	5000	29	31	
4/26/2018 4:15:00 PM	8	5000	30	29	
4/26/2018 4:30:00 PM	9	5000	29	29	
4/26/2018 4:45:00 PM	9	5000	30	28	
4/26/2018 5:00:00 PM	9	5000	29	28	
4/26/2018 5:15:00 PM	10	5000	29	29	
4/26/2018 5:30:00 PM	10	5000	29	29	
4/26/2018 5:45:00 PM	9	5000	29	28	
4/26/2018 6:00:00 PM	10	5000	28	29	
4/26/2018 6:15:00 PM	11	5000	27	30	
4/26/2018 6:30:00 PM	10	5000	27	31	
4/26/2018 6:45:00 PM	11	5000	27	32	
4/26/2018 7:00:00 PM	11	4980	26	33	
4/26/2018 7:15:00 PM	15	4760	25	36	
4/26/2018 7:30:00 PM	17	4220	23	42	
4/26/2018 7:45:00 PM	18	4240	21	47	
4/26/2018 8:00:00 PM	21	4240	19	55	
4/26/2018 8:15:00 PM	21	4240	18	58	
4/26/2018 8:30:00 PM	19	4240	17	60	





Equipment number	CHM0100003116			Life(%)	37
Time	Eq. H2S (TRS) Level (ppb)	Bat.(mV)	Temp. °C	Humidity %	
5/19/2018 9:15:00 AM	14	3560	24	82	
5/19/2018 9:00:00 AM	13	3640	25	82	
5/19/2018 8:45:00 AM	14	3700	24	85	
5/19/2018 8:30:00 AM	14	3760	23	88	
5/19/2018 8:15:00 AM	15	3780	22	90	
5/19/2018 8:00:00 AM	16	3800	22	92	
5/19/2018 7:45:00 AM	17	3820	21	94	
5/19/2018 7:30:00 AM	17	3820	21	96	
5/19/2018 7:15:00 AM	18	3820	21	97	
5/19/2018 7:00:00 AM	18	3820	20	98	
5/19/2018 6:45:00 AM	18	3820	20	99	
5/19/2018 6:30:00 AM	18	3820	20	100	
5/19/2018 6:15:00 AM	19	3840	20	100	
5/19/2018 6:00:00 AM	20	3840	20	101	
5/19/2018 5:45:00 AM	20	3840	20	100	
5/19/2018 5:30:00 AM	20	3840	20	100	
5/19/2018 5:15:00 AM	19	3840	20	100	
5/19/2018 5:00:00 AM	19	3860	20	100	
5/19/2018 4:45:00 AM	18	3860	20	99	
5/19/2018 4:30:00 AM	18	3860	20	100	
5/19/2018 4:15:00 AM	19	3860	20	100	
5/19/2018 4:00:00 AM	19	3860	20	100	
5/19/2018 3:45:00 AM	19	3860	20	100	
5/19/2018 3:30:00 AM	19	3860	20	99	
5/19/2018 3:15:00 AM	18	3880	20	99	
5/19/2018 3:00:00 AM	19	3880	20	100	
5/19/2018 2:45:00 AM	19	3880	20	100	
5/19/2018 2:30:00 AM	19	3880	20	99	
5/19/2018 2:15:00 AM	19	3880	20	98	
5/19/2018 2:00:00 AM	19	3880	20	98	
5/19/2018 12:45:00 AM	19	3880	21	95	
5/19/2018 12:30:00 AM	19	3880	21	95	
5/19/2018 12:15:00 AM	20	3880	21	95	
5/19/2018 12:00:00 AM	19	3880	21	94	
5/19/2018 1:45:00 AM	19	3880	20	97	
5/19/2018 1:30:00 AM	19	3880	20	97	
5/19/2018 1:15:00 AM	19	3880	20	97	
5/19/2018 1:00:00 AM	19	3880	21	96	
5/18/2018 9:45:00 PM	20	3900	22	84	
5/18/2018 9:45:00 AM	12	4200	25	80	
5/18/2018 9:30:00 PM	20	3900	22	82	
5/18/2018 9:30:00 AM	12	4200	25	82	
5/18/2018 9:15:00 PM	19	3920	23	81	
5/18/2018 9:15:00 AM	14	4200	24	87	
5/18/2018 9:00:00 PM	20	3920	23	79	



Equipment number	CHM0100003117			Life(%)	35
Time	Eq. H2S (TRS) Level (ppb)	Bat.(mV)	Temp. °C	Humidity %	
5/22/2018 12:00:00 AM	36	4180	19	102	
5/22/2018 12:15:00 AM	36	4180	19	102	
5/22/2018 12:30:00 AM	36	4180	19	102	
5/22/2018 12:45:00 AM	36	4180	19	102	
5/22/2018 1:00:00 AM	36	4180	19	102	
5/22/2018 1:15:00 AM	36	4180	19	101	
5/22/2018 1:30:00 AM	36	4180	19	102	
5/22/2018 1:45:00 AM	36	4180	18	102	
5/22/2018 2:00:00 AM	36	4180	18	102	
5/22/2018 2:15:00 AM	36	4180	18	102	
5/22/2018 2:30:00 AM	36	4180	19	102	
5/22/2018 2:45:00 AM	36	4180	19	102	
5/22/2018 3:00:00 AM	38	4180	19	102	
5/22/2018 3:15:00 AM	44	4180	19	102	
5/22/2018 3:30:00 AM	50	4180	19	101	
5/22/2018 3:45:00 AM	43	4180	19	101	
5/22/2018 4:00:00 AM	41	4180	18	102	
5/22/2018 4:15:00 AM	40	4180	18	101	
5/22/2018 4:30:00 AM	39	4180	18	102	
5/22/2018 4:45:00 AM	40	4180	18	102	
5/22/2018 5:00:00 AM	40	4180	18	102	
5/22/2018 5:15:00 AM	40	4180	18	102	
5/22/2018 5:30:00 AM	40	4180	18	102	
5/22/2018 5:45:00 AM	39	4180	18	102	
5/22/2018 6:00:00 AM	39	4180	18	102	
5/22/2018 6:15:00 AM	40	4180	18	102	
5/22/2018 6:30:00 AM	38	4180	18	102	
5/22/2018 6:45:00 AM	39	4180	18	103	
5/22/2018 7:00:00 AM	39	4180	18	103	
5/22/2018 7:15:00 AM	39	4180	19	103	
5/22/2018 7:30:00 AM	40	4180	19	103	
5/22/2018 7:45:00 AM	40	4180	20	103	
5/22/2018 8:00:00 AM	39	4180	21	103	
5/22/2018 8:15:00 AM	38	4180	21	101	
5/22/2018 8:30:00 AM	37	4180	22	100	
5/22/2018 8:45:00 AM	37	4180	22	99	
5/22/2018 9:00:00 AM	34	4180	24	95	
5/22/2018 9:15:00 AM	28	4180	26	85	
5/22/2018 9:30:00 AM	30	4180	27	80	
5/22/2018 9:45:00 AM	28	4180	28	77	
5/22/2018 10:00:00 AM	26	4180	30	70	
5/22/2018 10:15:00 AM	24	4180	32	65	
5/22/2018 10:30:00 AM	25	4180	33	59	
5/22/2018 10:45:00 AM	24	4180	34	56	
5/22/2018 11:00:00 AM	26	4180	34	54	



5/22/2018 11:15:00 AM	25	4180	35	52
5/22/2018 11:30:00 AM	27	4180	35	51
5/22/2018 11:45:00 AM	32	4180	35	51
5/22/2018 12:00:00 PM	34	4180	34	53
5/22/2018 12:15:00 PM	35	4180	32	58
5/22/2018 12:30:00 PM	28	4180	32	58
5/22/2018 12:45:00 PM	32	4180	30	61
5/22/2018 1:00:00 PM	35	4180	27	68
5/22/2018 1:15:00 PM	35	4180	27	76
5/22/2018 1:30:00 PM	22	4180	30	63
5/22/2018 1:45:00 PM	25	4180	32	58
5/22/2018 2:00:00 PM	25	4180	34	56
5/22/2018 2:15:00 PM	28	4180	33	55
5/22/2018 2:30:00 PM	35	4180	30	64
5/22/2018 2:45:00 PM	34	4180	28	70
5/22/2018 3:00:00 PM	36	4180	26	77
5/22/2018 3:15:00 PM	34	4180	23	85
5/22/2018 3:30:00 PM	33	4180	21	89
5/22/2018 3:45:00 PM	34	4180	20	95
5/22/2018 4:00:00 PM	34	4180	20	96
5/22/2018 4:15:00 PM	34	4180	21	97
5/22/2018 4:30:00 PM	32	4180	21	98
5/22/2018 4:45:00 PM	31	4180	22	95
5/22/2018 5:00:00 PM	30	4180	24	92
5/22/2018 5:15:00 PM	30	4180	24	90
5/22/2018 5:30:00 PM	32	4180	24	90
5/22/2018 5:45:00 PM	31	4180	24	89
5/22/2018 6:00:00 PM	28	4180	24	87
5/22/2018 6:15:00 PM	33	4180	24	89
5/22/2018 6:30:00 PM	30	4180	24	87
5/22/2018 6:45:00 PM	33	4180	24	90
5/22/2018 7:00:00 PM	33	4180	24	92
5/22/2018 7:15:00 PM	34	4180	24	93
5/22/2018 7:30:00 PM	33	4180	23	92
5/22/2018 7:45:00 PM	32	4180	23	92
5/22/2018 8:00:00 PM	32	4180	23	92
5/22/2018 8:15:00 PM	32	4180	22	93
5/22/2018 8:30:00 PM	33	4180	22	93
5/22/2018 8:45:00 PM	33	4180	22	94
5/22/2018 9:00:00 PM	33	4180	21	95
5/22/2018 9:15:00 PM	33	4180	21	96
5/22/2018 9:30:00 PM	34	4180	21	97
5/22/2018 9:45:00 PM	34	4180	21	98
5/22/2018 10:00:00 PM	35	4180	21	99
5/22/2018 10:15:00 PM	34	4180	21	100
5/22/2018 10:30:00 PM	34	4180	21	100
5/22/2018 10:45:00 PM	33	4180	21	100



Equipment number	CHM0100003167			Life(%)	35
Time	Eq. H2S (TRS) Level (ppb)	Bat.(mV)	Temp. °C	Humidity %	
5/24/2018 2:30:00 PM	14	4180	32	60	
5/24/2018 2:45:00 PM	15	4180	30	63	
5/24/2018 3:00:00 PM	17	4180	28	70	
5/24/2018 3:15:00 PM	16	4180	26	76	
5/24/2018 3:30:00 PM	15	4180	25	80	
5/24/2018 3:45:00 PM	12	4180	24	78	
5/24/2018 4:00:00 PM	13	4180	24	81	
5/24/2018 4:15:00 PM	14	4180	23	85	
5/24/2018 4:30:00 PM	14	4180	24	86	
5/24/2018 4:45:00 PM	7	4180	28	73	
5/24/2018 5:00:00 PM	6	4180	29	68	
5/24/2018 5:15:00 PM	11	4180	28	69	
5/24/2018 5:30:00 PM	12	4180	27	71	
5/24/2018 5:45:00 PM	11	4180	26	71	
5/24/2018 6:00:00 PM	10	4180	27	70	
5/24/2018 6:15:00 PM	7	4180	29	65	
5/24/2018 6:30:00 PM	10	4180	29	65	
5/24/2018 6:45:00 PM	11	4180	29	66	
5/24/2018 7:00:00 PM	11	4180	28	66	
5/24/2018 7:15:00 PM	12	4180	28	68	
5/24/2018 7:30:00 PM	11	4180	27	68	
5/24/2018 7:45:00 PM	12	4180	27	69	
5/24/2018 8:00:00 PM	13	4180	25	72	
5/24/2018 8:15:00 PM	15	4180	24	76	
5/24/2018 8:30:00 PM	14	4180	23	80	
5/24/2018 8:45:00 PM	14	4180	23	84	
5/24/2018 9:00:00 PM	14	4180	22	86	
5/24/2018 9:15:00 PM	13	4180	22	87	
5/24/2018 9:30:00 PM	13	4180	22	89	
5/24/2018 9:45:00 PM	14	4180	22	90	
5/24/2018 10:00:00 PM	14	4180	21	91	
5/24/2018 10:15:00 PM	14	4180	21	92	
5/24/2018 10:30:00 PM	14	4180	21	92	
5/24/2018 10:45:00 PM	14	4180	21	93	
5/24/2018 11:00:00 PM	14	4180	20	94	
5/24/2018 11:15:00 PM	14	4180	20	95	
5/24/2018 11:30:00 PM	14	4180	20	95	
5/24/2018 11:45:00 PM	16	4180	20	97	
5/25/2018 12:00:00 AM	16	4180	20	97	
5/25/2018 12:15:00 AM	17	4180	20	99	
5/25/2018 12:30:00 AM	17	4180	20	100	
5/25/2018 12:45:00 AM	17	4180	20	100	
5/25/2018 1:00:00 AM	17	4180	20	100	
5/25/2018 1:15:00 AM	16	4180	19	100	
5/25/2018 1:30:00 AM	17	4180	19	100	





**Seely, Chance**

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**From:** BlueRidge  
**Sent:** Wednesday, June 13, 2018 11:03 AM  
**To:** Seely, Chance  
**Subject:** FW: New submission from Odor Report

**From:** Blue Ridge Landfill Contact [<mailto:contact@blueridgelandfill.com>]  
**Sent:** Saturday, May 05, 2018 10:33 PM  
**To:** BlueRidge  
**Subject:** New submission from Odor Report

**Name**

**Email**

**Phone**

*Redacted*

**Location (Address or Cross Streets)**

**Date**

05/06/2018

**Odor Strength**

7

**Time**

11:00 pm

**Odor Description**

Hi, smell is strong through the house through night hours off of Southlake and Broadway St.

RECEIVED  
6/13/18





# Odor Complaint Form

To be completed when a complaint is received from the community through the 24-hour hot-line/message line

## Complaint Information

Date received: 05/07/2018  
Time received: 13:34  
Received by: Chance Seely

## Caller's Contact Information

Name: [REDACTED]  
Date and time detected: 05/05/2018 22:30  
Address: Alder Glen Ln, Pearland, TX 77584, USA  
Location:  
Email:

## Odor Description

Type of odor: Garbage 506  
Intensity: 7  
Duration: 1 hour  
Other notes: No Description of the odor given

## Weather Conditions at the Time Odors were Detected

Reporting station: KAXH  
Wind speed: 0.0 mph  
Wind direction:  
Temperature: 65.2°F  
Pressure: 30.09 mm  
Humidity: 82.0%  
Precipitation: 0.0 in  
Conditions: Clear

Was a complaint regarding an odor within 100 feet of this location received within the past 12 months?  
No

## Follow-up

What was the follow-up method?  
Yes  
When was the follow-up contact made?  
05/09/2018 15:40  
Who made the contact?  
Chance Seely  
What issues were discussed in the follow-up?

The response email discussed the post complaint follow up odor investigation at the Alder Glen Ln, Pearland, 77584 location that was given in the initial email from [REDACTED]. It was also noted that no odors have been reported at the location during the follow up or in the past

## Findings and conclusion of the odor investigation:

In conclusion we have not identified the source of the odor, at this time.

## Corrective action taken as outlined in the BRLF Odor Control Plan:

Because no odors were encountered during the follow up, we have added this location to the off route periodic monitoring list.



## Seely, Chance

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**From:** BlueRidgeReporting  
**Sent:** Wednesday, May 09, 2018 3:49 PM  
**To:** [REDACTED]  
**Subject:** Odor Report Follow up

Thank you for contacting Blue Ridge Landfill,

We have conducted an odor survey on 05/07/2018 at 1:53 PM as follow up to your observation dated 05/05/2018 at 10:30 PM. We commuted to the Alder Glen Ln, Pearland, TX, 77584 location at the above mentioned time and date. Upon arrival we encountered no odor. We have researched our records for other such odors in the vicinity of your observation, and we have not been able to determine a source for the observed odor at this time.

Sincerely,  
The Blue Ridge Landfill Team



We'll handle it from here!





**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  
Photos taken by Ms. Reyna Loosmore



**Photo No. 1 of 3: Photograph showing sign located on the front gate which communicates the complaint hotline/website system**



**Photo No. 2 of 3: Photograph showing leachate tanks.**

**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**  
**Photos taken by Ms. Reyna Loosmore**



**Photo No. 3 of 3: Photograph showing dual carbon canister system installed by the leachate tanks.**



# ATTACHMENT 3



## Reyna Loosmore

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**From:** Stengl, Burgess  
**Sent:** Friday, June 15, 2018 3:32 PM  
**To:** Reyna Loosmore  
**Cc:** Alma Jefferson; Meadows, Mark; Seely, Chance; Kubinski, Amy  
**Subject:** RE: Compliance Schedule Evaluation Exit Interview Form  
**Attachments:** Agreed Order RR-Exit Interview - 6-15-18.pdf

Reyna, attached is the signed Exit Interview per your request. We will send the documentation for the website start up next week.

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  
f 713-676-7882 w [www.RepublicServices.com](http://www.RepublicServices.com)



We'll handle it from here.™



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**From:** Reyna Loosmore [mailto:Reyna.Loosmore@tceq.texas.gov]  
**Sent:** Friday, June 15, 2018 10:53 AM  
**To:** Stengl, Burgess  
**Cc:** Alma Jefferson  
**Subject:** Compliance Schedule Evaluation Exit Interview Form  
**Importance:** High

Good Morning Mr. Stengl

Attached please find the Exit Interview Form relating to the Compliance Schedule Evaluation conducted on June 13, 2018 at Blue Ridge Landfill. Please reply to this email, with the attachment, to indicate your receipt.

If there are any questions about the information contained in the form contact me as soon as possible.

*Reyna L. Loosmore*



TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested				
Regulated Entity/Site Name	Blue Ridge Landfill		TCEQ Add. ID No. RN No (optional)	RN 102610102
Investigation Type	MSW	Contact Made In-House (Y/N)	Y	Purpose of Investigation
Regulated Entity Contact	Burgess Stengl	Telephone No.	713-676-7669	Date Contacted
Title	Environmental Manager	F-mail:		Date E-mailed:

**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 of this form 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 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	Rule Citation (if known)	Description of issue	
1	RR		Provide documentation demonstrating that the odor complaint web-site has been activated and was operational on the date of May 1, 2018 in accordance with provisions of the Revised Odor Control Plan approved on April 10, 2018 and Agreed Order Section IV., Ordering Provision (OP) 3.c.  On June 13, 2018, Blue Ridge Landfill provided a copy of a complaint received via the odor complaint website, dated May 5, 2018, demonstrating that the complaint website has been activated. However, Blue Ridge Landfill is requested to demonstrate that the website was operational on the date of May 1, 2018.	
2	RR		Provide documentation demonstrating that the 24-hour Odor Complaint Hotline/Message-line and web-site have been communicated to the public and all information was posted on the front gate on the day of May 1, 2018 in accordance with provisions of the Revised Odor Control Plan approved on April 10, 2018 and Agreed Order Section IV., Ordering Provision (OP) 3.c.  On June 13, 2018, Blue Ridge Landfill provided a copy of an information report, dated May 2, 2018, posted on their website communicating to the public the availability of the 24-hour Odor Complaint Hotline/Message-line and website complaint system. Additionally, a photograph was taken on June 13, 2018 of the sign located on the front gate communicating the complaint hotline/website system.	
3	RR		Provide documentation demonstrating that the 24-hour fence line monitoring was activated on the day of May 22, 2018 in accordance with provisions of the Revised Odor Control Plan approved on April 10, 2018 and Agreed Order Section IV., Ordering Provision (OP) 3.c.  On June 13, 2018, Blue Ridge Landfill provided documentation dated April 26, May 18, 19, and 22, 2018, demonstrating that the 24-hour fence line monitoring was activated before May 22, 2018.	

'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 x No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes x No

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.

*Reyna L. Loosmore* / Reyna L. Loosmore 06/15/18 *Burgess Stengl* / Burgess Stengl 6/15/18

Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date
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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.

Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date
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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.





# **ATTACHMENT 4**



Mr. Norton's Direct Line: (512) 322-5884  
Email: [dnorton@lglawfirm.com](mailto:dnorton@lglawfirm.com)

June 1, 2018

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

Rajesh Acharya  
TCEQ Enforcement Coordinator, MC-219  
Texas Commission on Environmental Quality  
Enforcement Division  
P.O. Box 13087  
Austin, Texas 78711-3087

RECEIVED

JUN 01 2018

Enforcement Division

Re: Blue Ridge Landfill TX, LP; RN102610102  
TCEQ Docket No. 2016-1923-AIR-E; MSW Permit No. 1505A  
Documentation in Support of Written Certification of Brandon Rogers  
Enforcement Case No. 53555

Dear Mr. Acharya:

Per your request, on behalf of Blue Ridge Landfill TX, LP ("BRLF"), enclosed please find the documentation and information in support of the written certification of compliance of Brandon Rogers dated May 10, 2018.

**Surface Emissions Monitoring.** Enclosed are cover letters from American Environmental Group, Ltd. - Tetra Tech Company as evidence of the NSPS Surface Emissions Monitoring ("SEM") performed at BRLF for the 1st Quarter, 2nd Quarter, 3rd Quarter, 4th Quarter of 2017, and 1st Quarter of 2018 in accordance with the procedures and protocols implemented at the Blue Ridge Landfill beginning January 1, 2017. A complete record of each quarterly SEM report is not provided in this response because the reports are too voluminous. Enclosed also find an email dated May 4, 2018 from Chance Seely (BRLF) to Samuel Cortez (TCEQ) confirming the first bimonthly SEM event conducted at the BRLF on May 4, 2018, prior to the date of the written certification of compliance of Brandon Rogers.

**Odor Complaint Hotline/Message Line and Website.** Enclosed are two Odor Complaint Forms ("Forms") dated May 7, 2018 and May 8, 2018. The forms provided as evidence that the 24-hour hotline/message line is operational and that BRLF set up the hotline/message line prior to the date of the written certification of compliance of Brandon Rogers. The phone number of the BRLF 24-hour hotline/message line is (281) 668-9747. The link to the operational BRLF website is <http://blueridgelandfill.com/contact-us/odor-report/>.



**Dual Carbon Canister System.** Enclosed is a photo dated April 24, 2018 as evidence of the dual carbon system installed at BRLF.

**TCEQ-BRLF Semi-Annual Meeting.** BRLF Management Team will work with TCEQ to schedule the first semi-annual meeting to discuss the progress of the BRLF odor control plan at the appropriate, scheduled time.

**24-Hour Fence Line Monitoring.** BRLF began conducting fence line monitoring in accordance with the approved BRLF odor control plan. In support thereof, enclosed is an email dated May 3, 2018 from Chance Seely (BRLF) to Mary-Leigh Winkler, (Weaver Consultants Group) as evidence that the fence line monitoring began prior to the required implementation deadline.

BRLF appreciates the opportunity to provide you the enclosed supporting documentation. Should you have questions regarding this correspondence, or the enclosed documentation, please feel free to call me (512-322-5884) at your convenience.

Sincerely,



Duncan C. Norton  
Lloyd Gosselink Rochelle & Townsend, P.C.  
Attorney for Blue Ridge Landfill TX, LP

cc: Mr. Bryan Sinclair, Director, TCEQ Enforcement Division  
Mr. Joseph Doby, Air Section Manager, TCEQ Houston Regional Office  
Brandon Rogers, Republic Services  
Scott Trebus, Republic Services  
Burgess Stengl, Republic Services



**BRLF Surface Emission Monitoring Event**  
**Information**

**1st Quarter 2017 SEM Cover Letter**

**2nd Quarter 2017 SEM Cover Letter**

**3rd Quarter 2017 SEM Cover Letter**

**4th Quarter 2017 SEM Cover Letter**

**1st Quarter 2018 SEM Cover Letter**

**Email to Samuel Cortez (TCEQ) re Confirmation  
of 1st Bimonthly SEM Event**







April 07, 2017

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

**RE: NSPS Surface Emissions Monitoring at Blue Ridge Landfill – 1st Quarter 2017**

Dear Mr. Stengl,

American Environmental Group, Ltd. (AEG) prepared the enclosed report documenting the results of the 4th Quarter 2016 NSPS surface scan at Blue Ridge Landfill. The initial monitoring event was performed on February 23, 2017, February 24, 2017, and February 25, 2017. Fifty-nine (59) 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 March 01, 2017 and March 02, 2017. Monitoring of the 58 of the 59 exceedance areas indicated readings below the 500 ppm standard. Exceedance area #7 indicated readings above the 500 ppm standard.

The 2nd 10 day recheck was performed on March 10, 2017. Exceedance area #7 indicated a reading below the 500 ppm standard.

The one month rechecks on the 59 exceedance areas were conducted on March 21, 2017. Each of these areas passed the one month recheck with readings reflected below the 500 ppm standard.

In summary, 59 of 59 exceedance areas passed the 1<sup>st</sup> Quarter 2017 surface scan event. All of the appropriate forms are attached for your files.

#### Weather Conditions

Weather condition recorded during the monitoring event was as follows:

##### February 23, 2017

- Temperature approximately 66° Fahrenheit
- Relative humidity of 82 percent
- Barometric pressure of 29.74"Hg
- Wind Calm
- Scattered skies

##### February 24, 2017

- Temperature approximately 70° Fahrenheit
- Relative humidity of 67 percent
- Barometric pressure of 29.78"Hg
- Wind East-Northeast at 3.5 mph
- Clear skies

##### February 25, 2017

- Temperature approximately 58° Fahrenheit
- Relative humidity of 47 percent
- Barometric pressure of 30.06"Hg
- Wind North at 11.5 mph
- Clear skies



March 01, 2017

- Temperature approximately 83° Fahrenheit
- Relative humidity of 60 percent
- Barometric pressure of 30.03"Hg
- Wind Calm
- Overcast skies

March 02, 2017

- Temperature approximately 58° Fahrenheit
- Relative humidity of 34 percent
- Barometric pressure of 30.35"Hg
- Wind Northeast at 10.4 mph
- Clear skies

March 10, 2017

- Temperature approximately 70° Fahrenheit
- Relative humidity of 90 percent
- Barometric pressure of 30.10"Hg
- Wind Calm
- Cloudy skies

March 21, 2017

- Temperature approximately 69° Fahrenheit
- Relative humidity of 76 percent
- Barometric pressure of 30.11"Hg
- Wind South at 10.4 mph
- Clear 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 Michael Widner at (682) 557-4697.

Sincerely,



Steven Paul  
Environmental Data Coordinator  
American Environmental Group, Ltd.

On Behalf of  
Mike Widner  
Regional Manager - American Environmental Group, Ltd.

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





July 17, 2017

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

**RE: NSPS Surface Emissions Monitoring at Blue Ridge Landfill – 2<sup>nd</sup> Quarter 2017**

Dear Mr. Stengl,

Tetra Tech prepared the enclosed report documenting the results of the 2<sup>nd</sup> Quarter 2017 NSPS surface scan at Blue Ridge Landfill. The initial monitoring event was performed on May 31, 2017 and June 1, 2017. Nineteen (19) 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 June 01, 2017. All of the 19 exceedance areas indicated readings below the 500 ppm standard.

The 30 day recheck monitoring was performed on June 27, 2017. Monitoring of the nineteen exceedance locations again indicated all readings were less than the 500 ppm standard.

In summary, 19 of 19 exceedance areas passed the 2<sup>nd</sup> Quarter 2017 surface scan event. Field monitoring forms are attached for your files.

#### Weather Conditions

Weather condition recorded during the monitoring event was as follows:

May 31, 2017

- Temperature approximately 78° Fahrenheit
- Relative humidity of 93 percent
- Barometric pressure of 30.00"Hg
- Wind Calm
- Cloudy skies

June 1, 2017

- Temperature approximately 76° Fahrenheit
- Relative humidity of 85 percent
- Barometric pressure of 29.78"Hg
- Wind East Northeast at 3 mph
- Overcast skies

June 27, 2017

- Temperature approximately 78° Fahrenheit
- Relative humidity of 85 percent
- Barometric pressure of 29.98"Hg
- Wind East Northeast at 3 mph
- Overcast 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 Michael Widner at (682) 557-4697.

Sincerely,

Mike Widner  
Regional Manager – Tetra Tech

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







## TETRA TECH

October 3, 2017

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

**RE: NSPS Surface Emissions Monitoring at Blue Ridge Landfill – 3<sup>rd</sup> Quarter 2017**

Dear Mr. Stengl,

Tetra Tech prepared the enclosed report documenting the results of the 3<sup>rd</sup> Quarter 2017 NSPS surface scan at Blue Ridge Landfill. The initial monitoring event was performed on August 8, August 9, and August 10, 2017. Sixteen (16) 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 August 17, 2017. All of the 16 exceedance areas indicated readings below the 500 ppm standard.

The 30 day recheck monitoring was performed on September 06, 2017. Monitoring of the sixteen exceedance locations again indicated all readings were less than the 500 ppm standard.

In summary, 16 of 16 exceedance areas passed the 3<sup>rd</sup> Quarter 2017 surface scan event. Field monitoring forms are attached for your files.

### Weather Conditions

Weather condition recorded during the monitoring event was as follows:

August 8, 2017

- Temperature approximately 81° Fahrenheit
- Relative humidity of 83 percent
- Barometric pressure of 29.82"Hg
- Wind WNW at 5 mph
- Cloudy skies

August 9, 2017

- Temperature approximately 85° Fahrenheit
- Relative humidity of 71 percent
- Barometric pressure of 29.95"Hg
- Wind W at 3 mph
- Overcast skies

August 10, 2017

- Temperature approximately 90° Fahrenheit
- Relative humidity of 69 percent
- Barometric pressure of 30.03"Hg
- Wind S at 5 mph
- Mostly cloudy skies



August 17, 2017

- Temperature approximately 90° Fahrenheit
- Relative humidity of 62 percent
- Barometric pressure of 29.98"Hg
- Wind SSW at 7 mph
- Clear skies

September 6, 2017

- Temperature approximately 89° Fahrenheit
- Relative humidity of 65 percent
- Barometric pressure of 30.00"Hg
- Wind W at 3 mph
- Overcast 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 Michael Widner at (682) 557-4697.

Sincerely,

Mike Widner  
Regional Manager – Tetra Tech

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





**TETRA TECH**

February 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 – 4<sup>th</sup> Quarter 2017**

Dear Mr. Stengl,

Tetra Tech prepared the enclosed report documenting the results of the 4<sup>th</sup> Quarter 2017 NSPS surface scan at Blue Ridge Landfill. The initial monitoring event was performed on November 9, November 10, November 11, December 29 and December 30, 2017. Thirty (30) 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 November 17, November 18, 2017 and January 3, 2018. All of the 30 exceedance areas indicated readings below the 500 ppm standard.

The 30 day recheck monitoring was performed on December 8, 2017 and January 22, 2018. Monitoring of the Thirty exceedance locations again indicated all readings were less than the 500 ppm standard.

In summary, 30 of 30 exceedance areas passed the 4<sup>th</sup> Quarter 2017 surface scan event. Field monitoring forms are attached for your files.

#### Weather Conditions

Weather condition recorded during the monitoring event was as follows:

November 9, 2017

- Temperature approximately 80° Fahrenheit
- Relative humidity of 73 percent
- Barometric pressure of 29.80"Hg
- Wind S at 2 mph
- Cloudy skies

November 10, 2017

- Temperature approximately 73° Fahrenheit
- Relative humidity of 78 percent
- Barometric pressure of 30.03"Hg
- Wind N at 4 mph
- Overcast skies

November 11, 2017

- Temperature approximately 72° Fahrenheit
- Relative humidity of 60 percent
- Barometric pressure of 30.11"Hg
- Wind N at 7 mph
- Partly cloudy skies



November 17, 2017

- Temperature approximately 73° Fahrenheit
- Relative humidity of 85 percent
- Barometric pressure of 29.99"Hg
- Wind S at 3 mph
- Partly cloudy skies

November 18, 2017

- Temperature approximately 71° Fahrenheit
- Relative humidity of 70 percent
- Barometric pressure of 29.93"Hg
- Wind W at 7 mph
- Mostly cloudy skies

December 8, 2017

- Temperature approximately 34° Fahrenheit
- Relative humidity of 82 percent
- Barometric pressure of 30.26"Hg
- Wind NNW at 8 mph
- Overcast skies

December 29, 2017

- Temperature approximately 48° Fahrenheit
- Relative humidity of 75 percent
- Barometric pressure of 30.32"Hg
- Wind ENE at 7 mph
- Overcast skies

December 30, 2017

- Temperature approximately 56° Fahrenheit
- Relative humidity of 89 percent
- Barometric pressure of 30.14"Hg
- Wind NNE at 4 mph
- Overcast skies

January 3, 2018

- Temperature approximately 33° Fahrenheit
- Relative humidity of 54 percent
- Barometric pressure of 30.47"Hg
- Wind NNW at 8 mph
- Clear skies

January 22, 2018

- Temperature approximately 53° Fahrenheit
- Relative humidity of 57 percent
- Barometric pressure of 30.04"Hg
- Wind WNW at 8 mph
- Clear skies

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

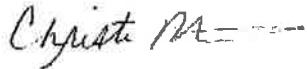




The survey was conducted in accordance with the regulations set forth in the New Source Performance Standard (NSPS), 40 CFR 60.755 (c) and (d); (2) 40 CFR 60, 40 CFR 60.753(d) - Surface Scan Requirements, Appendix A - Method 21. A Thermo Scientific (MicroFID) flame ionization detector (FID) was used 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,

A handwritten signature in cursive script, appearing to read "Christi Markuten".

O&M South Region Project Manager

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





April 23, 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 – 1<sup>st</sup> Quarter 2018**

Dear Mr. Stengl,

Tetra Tech prepared the enclosed report documenting the results of the 1<sup>st</sup> Quarter 2018 NSPS surface scan at Blue Ridge Landfill. The initial monitoring event was performed on February 20, February 22, February 23, and February 26, 2018. Thirty (31) 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 February 27, and March 1, 2018. All of the 31 exceedance areas indicated readings below the 500 ppm standard.

The 30 day recheck monitoring was performed on March 21, 2018 and March 22, 2018. Monitoring of the Thirty-one exceedance locations again indicated all readings were less than the 500 ppm standard.

In summary, 31 of 31 exceedance areas passed the 1<sup>st</sup> 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:

February 20, 2018

- Temperature approximately 74° Fahrenheit
- Relative humidity of 87 percent
- Barometric pressure of 29.98"Hg
- Wind SSE at 15 mph
- Cloudy skies

February 22, 2018

- Temperature approximately 61° Fahrenheit
- Relative humidity of 78 percent
- Barometric pressure of 30.18"Hg
- Wind NNW at 6 mph
- Overcast skies

February 23, 2018

- Temperature approximately 68° Fahrenheit
- Relative humidity of 89 percent
- Barometric pressure of 30.12"Hg
- Wind SSE at 5 mph
- Mostly cloudy skies



February 26, 2018

- Temperature approximately 64° Fahrenheit
- Relative humidity of 81 percent
- Barometric pressure of 29.99"Hg
- Wind S at 3 mph
- Partly cloudy skies

February 27, 2018

- Temperature approximately 72° Fahrenheit
- Relative humidity of 85 percent
- Barometric pressure of 30.05"Hg
- Wind SE at 11 mph
- Overcast skies

March 1, 2018

- Temperature approximately 70° Fahrenheit
- Relative humidity of 66 percent
- Barometric pressure of 29.98"Hg
- Wind N at 11 mph
- Overcast skies

March 21, 2018

- Temperature approximately 65° Fahrenheit
- Relative humidity of 33 percent
- Barometric pressure of 30.17"Hg
- Wind E at 7 mph
- Clear skies

March 22, 2018

- Temperature approximately 66° Fahrenheit
- Relative humidity of 60 percent
- Barometric pressure of 30.25"Hg
- Wind SE at 3 mph
- Clear skies

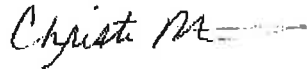
In accordance with NSPS regulations, this monitoring event was performed during typical meteorological conditions.



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,

A handwritten signature in cursive script, appearing to read "Christi Markuten", followed by a horizontal line.

O&M South Region Project Manager

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





**Stengl, Burgess**

---

**From:** Seely, Chance  
**Sent:** Friday, May 04, 2018 6:05 PM  
**To:** samuel.cortez@tceq.texas.gov  
**Cc:** Stengl, Burgess  
**Subject:** Confirmation of SEM completion

Mr.Cortez,

I am sending this email on behalf of Burgess.

Please accept this email as confirmation that the SEM event at Blue Ridge has been completed this afternoon (05/04/2018).

Thank you and have a great weekend,

Chance Seely



**BRLF Odor Hotline/Message Line and Website  
Information**





# Odor Complaint Form

To be completed when a complaint is received from the community  
through the 24-hour hot-line/message line

### Complaint Information

Date received: 05/07/2018  
Time received: 13:34  
Received by: Chance Seely

### Caller's Contact Information

Name: [Redacted]  
Date and time detected: 05/05/2018 22:30  
Address: [Redacted] Alder Glen Ln, Pearland, TX 77584, USA  
Location:  
Email:

### Odor Description

Type of odor: Garbage 506  
Intensity: 7  
Duration: 1 hour  
Other notes: No Description of the odor given

### Weather Conditions at the Time Odors were Detected

Reporting station: KAXH  
Wind speed: 0.0 mph  
Wind direction:  
Temperature: 65.2°F  
Pressure: 30.09 mm  
Humidity: 82.0%  
Precipitation: 0.0 in  
Conditions: Clear

Was a complaint regarding an odor within 100 feet of this location received within the past 12 months?  
No

### Follow-up

What was the follow-up method?  
Yes

When was the follow-up contact made?  
05/09/2018 15:40

Who made the contact?  
Chance Seely

What issues were discussed in the follow-up?

The response email discussed the post complaint follow up odor investigation at the Alder Glen Ln, Pearland, 77584 location that was given in the initial email from [Redacted]. It was also noted that no odors have been reported at the location during the follow up or in the past

Findings and conclusion of the odor investigation:

In conclusion we have not identified the source of the odor, at this time.

Corrective action taken as outlined in the BRLF Odor Control Plan:

Because no odors were encountered during the follow up, we have added this location to the off route periodic monitoring list.





## Odor Complaint Form

*To be completed when a complaint is received from the community  
through the 24-hour hot-line/message line*

### Complaint Information

Date received: 05/08/2018  
Time received: 06:30  
Received by: Chance Seely

### Caller's Contact Information

Name:  
Date and time detected: 05/08/2018 04:00  
Address: Tide Rock Ln, Pearland, TX 77584, USA  
Location:  
Email:

### Odor Description

Type of odor: Garbage 506  
Intensity: 7  
Duration: 1 hour  
Other notes: No Description

### Weather Conditions at the Time Odors were Detected

Reporting station: KAXH  
Wind speed: 0.0 mph  
Wind direction:  
Temperature: 60.8°F  
Pressure: 30.08 mm  
Humidity: 100.0%  
Precipitation: 0.0 in  
Conditions: Mist

Was a complaint regarding an odor within 100 feet of this location received within the past 12 months?  
No

### Follow-up

What was the follow-up method?

Phone

When was the follow-up contact made?

05/10/2018 14:38

Who made the contact?

Burgess Stengl

What issues were discussed in the follow-up?

During the follow up call we discussed the follow up investigation findings. We also discussed the types of odors that the resident experiences. She asked many questions about money spent on improvements, and we did note that she asked us to be in her area at the night time hours.

Findings and conclusion of the odor investigation:

During the follow up on May 8, we experienced odor from the residential collection trucks and waste placed at the curb for pick up

Corrective action taken as outlined in the BRLF Odor Control Plan:

As corrective action we adjusted the odor systems and ensured that all of the gas wells were functioning properly.





## **Dual Carbon Canister System (Photo)**





Fresno  
April 24 10:06 AM

Details





## **BRLF Fence Line Monitoring Information**



**Seely, Chance**

---

**From:** Seely, Chance  
**Sent:** Thursday, May 03, 2018 4:44 PM  
**To:** Winkler, Mary-Leigh  
**Cc:** Stengl, Burgess  
**Subject:** Blue Ridge week 1  
**Attachments:** Week 1 Sensor 1 5\_3\_2018 Data(2018-05-03 16-31-46).xlsx; Week 1 Sensor 3 5\_3\_2018 Data(2018-05-03 16-17-28).xlsx; Week 1 Sensor 2 5\_3\_2018.xlsx

All,  
Please see the first weeks data .

If you have any questions please let me know.

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 [REDACTED]  
f 713-676-7882 w [www.RepublicServices.com](http://www.RepublicServices.com)



We'll handle it from here."









June 8, 2018

Mr. Chance Goodin  
MC 126  
Section Manager  
Municipal Solid Waste Permits Section  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Permit Modification – Odor Control Plan  
Blue Ridge Landfill - TCEQ MSW Permit No. 1505A  
Fort Bend County, Texas  
RN102610102/CN602820599

Dear Mr. Goodin:

On April 5, 2018 BRLF submitted the final revised Odor Control Plan, which was approved by the TCEQ on April 10, 2018. Agreed Odor TCEQ Docket No. 2016-1923-AIR-E for the Blue Ridge Landfill (BRLF) requires that a permit modification be submitted to revise Section 4.10 of site's existing Part IV-Site Operating Plan (SOP) to incorporate the TCEQ approved Odor Control Plan. As such, this Permit Modification is being submitted as outlined in the Agreed Order. In addition, other sections of the SOP as well as Attachments 14 and 15 of Part III-Site Development Plan have also been revised to provide consistency and references to the Odor Control Plan.

The following summarizes the changes made to the site's existing Part IV-SOP:

- The Part IV cover page has been revised to reflect the current revision date.
- Page v of Part IV-SOP Table of Contents was revised to indicate the addition of Appendix IVH.
- Section 2.1.2 Landfill Manager, Page IV-3 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Section 2.1.3 Scale House Staff, Page IV-4 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Section 3 Equipment, Page IV-12 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Table 4.2.2 Citizen Collection Station Capacity Information, Page IV-18 has been revised to be consistent with the TCEQ approved Odor Control Plan for the site.

**RECEIVED**

**JUN 11 2018**

- Section 4.10 – Air Quality and Odor Management Plan, Pages IV-26 through IV-28 has been revised to be consistent with the TCEQ approved Odor Control Plan for the site.
- Section 4.18.2 Daily Cover, Page IV-33 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Section 4.18.3 Intermediate Cover, Page IV-36 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Section 4.18.4 Final Cover, Page IV-36 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Table 4.23 Site Inspection and Maintenance List, Page IV-53 has been revised to be consistent with the TCEQ approved Odor Control Plan for the site.
- The Part IV Appendix IVD cover page has been revised to reflect the current revision date.
- Section 2.8 of Appendix IVD has been added to include the liquid waste bulking facility information consistent with the TCEQ Approved Odor Control Plan for the site.
- Appendix IVH has been added to include the Odor Control Plan.

The following summarizes the changes made to the site's existing Attachments 14 and 15 of the Part III - SDP:

- The Part III Attachment 14 cover page has been revised to reflect the current revision date.
- Attachment 14 Section 1.1 Scope, Page 14-1 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Attachment 14 Section 6.1 Existing LFG Collection and Control System, Page 14-19 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- The Part III Attachment 15 cover page has been revised to reflect the current revision date.
- Attachment 15 Section 3.4 Leachate Sumps and Pumps, Page 15-6 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.
- Attachment 15 Section 4.1 Leachate Storage, Page 15-7 has been revised to provide reference to the TCEQ approved Odor Control Plan for the site.

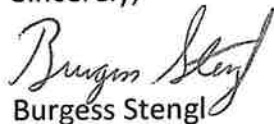
Please process this permit modification request per 30 TAC §305.70(l). An applicant certification consistent with 30 TAC §305.44 and §305.70(f) is included on Page 5 of the TCEQ-

20650 Form in Attachment 5 of this submittal. In accordance with Title 30 TAC §330.59(h)(1), a \$150 application fee has been submitted to TCEQ as documented on Page 1 of the TCEQ-20650 Form.

One original and one copy of the permit modification are provided for your use and distribution. To facilitate your review, we have included copies of the Part III – SDP and Part IV – SOP revisions in both clean and redline/strikeout formats. In addition, one copy of this permit modification has been provided to TCEQ Region 12 office. A copy of this submittal was also placed in the site operating record

If you have any questions or comments regarding this submittal, please do not hesitate to contact us.

Sincerely,



Burgess Stengl

Environmental Manager

Attachments: Attachment 1 – Part III – SDP & Part IV – SOP Revisions Pages (Clean Format)  
Attachment 2 – Part III – SDP & Part IV – SOP Revisions Pages (Redline/Strikeout Format)  
Attachment 3 – TCEQ-20650 Form

cc: TCEQ Region 12 Office  
Matt K. Stutz, Weaver Consultants Group



Facility Name: Blue Ridge Landfill  
Permittee/Registrant Name: Blue Ridge Landfill TX, LP  
MSW Authorization #: 1505A  
Initial Submittal Date: 06/08/2018  
Revision Date:



## Texas Commission on Environmental Quality

### Permit/Registration Modification and Temporary Authorization Application Form for an MSW Facility

#### 1. Reason for Submittal

- Initial Submittal                       Notice of Deficiency (NOD) Response

#### 2. Authorization Type

- Permit     Registration

#### 3. Application Type

- Modification with Public Notice               Modification without Public Notice  
 Temporary Authorization (TA)               Modification for Name Change/Transfer

#### 4. Application Fees

- Pay by Check                                       Online Payment

If paid online, e-Pay Confirmation Number: **582EA000305845**

#### 5. Application URL

Is the application submitted for a permit/registration modification with public notice?  
 Yes                       No

If the answer is "Yes", enter the URL address of a publicly accessible internet web site where the application and all revisions to that application will be posted in the space provided: http://

#### 6. Confidential Documents

Does the application contain confidential documents?  
 Yes                       No

If "Yes", cross-reference the confidential documents throughout the application and submit as a separate attachment in a binder clearly marked "CONFIDENTIAL."

**7. General Facility Information**

Facility Name: **Blue Ridge Landfill**  
MSW Authorization No.: **1505A**  
Regulated Entity Reference No.: **102610102**  
Physical or Street Address (if available): **2200 FM 521**  
City: **Fresno** County: **Fort Bend** State: **Texas** Zip Code: **77545**  
(Area code) Telephone Number: **(281) 835-6142**  
Latitude: **29° 33' 16" N** Longitude: **95° 26' 37" W**

**8. Facility Type(s)**

- |  |                                     |                                  |
|--|-------------------------------------|----------------------------------|
| <input checked="" type="checkbox"/> Type I | <input type="checkbox"/> Type IV    | <input type="checkbox"/> Type V  |
| <input type="checkbox"/> Type I AE         | <input type="checkbox"/> Type IV AE | <input type="checkbox"/> Type VI |

**9. Description of the Revisions to the Facility**

Provide a brief description of all revisions to the permit/registration conditions and supporting documents referred by the permit/registration, and a reference to the specific provisions under which the modification/temporary authorization application is being made. Also, provide an explanation of why the modification/temporary authorization is requested: **The purpose of this permit modification is to revise the site's existing Part III-Site Development Plan (SDP) and Part IV-Site Operating Plan (SOP) to include the Odor Control Plan into the site's permit.**

This section is intentionally left blank; please continue to the next page.

**10. Facility Contact Information**

**Site Operator (Permittee/Registrant) Name: Blue Ridge Landfill TX, LP**

Customer Reference No. (if issued)\*: CN602820599

Mailing Address: **P. O. Box 879**

City: **Fresno** County: **Fort Bend** State: **Texas** Zip Code: **77545**

(Area Code) Telephone Number: **(713) 676-7669**

Email Address: **BStengl@republicservices.com**

TX Secretary of State (SOS) Filing Number: **00014867611**

\*If the Site Operator (Permittee/Registrant) does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Site Operator (Permittee/Registrant) as the Customer.

**Operator Name<sup>1</sup>: Same as Site Operator (Permittee/Registrant)**

Customer Reference No. (if issued)\*:

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

Email Address:

Charter Number:

<sup>1</sup>If the Operator is the same as Site Operator/Permittee type "Same as "Site Operator (Permittee/Registrant)".

\*If the Operator does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Operator as the customer.

**Consultant Name (if applicable): Weaver Consultants Group , LLC**

Texas Board of Professional Engineers Firm Registration Number: **F-3727**

Mailing Address: **6420 Southwest Boulevard, Suite 206**

City: **Fort Worth** County: **Tarrant** State: **Texas** Zip Code: **76109**

(Area Code) Telephone Number: **817-735-9770**

E-Mail Address: **mstutz@wcgrp.com**

**Agent in Service Name (required only for out-of-state):**

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

E-Mail Address:

**11. Ownership Status of the Facility**

Is this a modification that changes the legal description, the property owner, or the Site Operator (Permittee/Registrant)?

Yes                     No

If the answer is "No", skip this section.

Does the Site Operator (Permittee/Registrant) own all the facility units and all the facility property?

Yes                     No

If "No", provide the information requested below for any additional ownership.

**Owner Name:**

Street or P.O. Box:

City:                    County:                    State:                    Zip Code:

(Area Code) Telephone Number:

Email Address (optional):

Charter Number:



**Signature Page**

I, Burgess Stengl Environmental Manager  
(Site Operator (Permittee/Registrant)'s Authorized Signatory) (Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Burgess Stengl Date: 6/8/18

-----  
**TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR**

I, \_\_\_\_\_, hereby designate \_\_\_\_\_  
(Print or Type Operator Name) (Print or Type Representative Name)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

\_\_\_\_\_  
Printed or Typed Name of Operator or Principal Executive Officer

\_\_\_\_\_  
Signature

SUBSCRIBED AND SWORN to before me by the said Burgess Stengl  
On this 8th day of June, 2018.  
My commission expires on the 17th day of May, 2021.

Helen Marie Hanson  
Notary Public in and for  
Tarrant County, Texas



(Note: Application Must Bear Signature & Seal of Notary Public)

## Permit/Registration Modification with Public Notice

(See Instructions for P.E. seal requirements.)

### Required Attachments

### Attachment No.

Land Ownership Map

Land Ownership List

Marked (Redline/Strikeout) Pages

Unmarked Revised Pages

### Additional Attachments as Applicable- Select all those apply and add as necessary

- Signatory Authority
- Fee Payment Receipt
- Confidential Documents

## Permit/Registration Modification without Public Notice or TA

(See Instructions for P.E. seal requirements.)

### Required Attachments (for Modifications only)

### Attachment No.

Marked (Redline/Strikeout) Pages

2

Unmarked Revised Pages

1

### Additional Attachments as Applicable- Select all those apply and add as necessary

- Signatory Authority
- Fee Payment Receipt
- Confidential Documents

## Permit/Registration Name Change/Transfer Modification

(See Instructions for P.E. seal requirements.)

### Required Attachments

### Attachment No.

TCEQ Core Data Form(s)

Property Legal Description

Property Metes and Bounds Description

Metes and Bounds Drawings

On-Site Easements Drawing

Land Ownership List

Land Ownership Map

Property Owner Affidavit

Verification of Legal Status

Evidence of Competency

### Additional Attachments as Applicable- Select all those apply and add as necessary

- Signatory Authority
- Fee Payment Receipt
- Confidential Documents
- Final Plat Record of Property, if platted
- Assumed Name Certificate

ORIGIN ID:GLEA (817) 735-9770  
MATT K. STUTZ, P.E.  
WEAVER CONSULTANTS GROUP, LLC  
SUITE 206  
FORT WORTH, TX 76109  
UNITED STATES US

SHIP DATE: 08 JUN 18  
ACTWTG: 1.00 LB  
CAD: 4928807/NET3980  
BILL SENDER

TO TCEQ REGION 12

5425 POLK AVENUE  
SUITE H

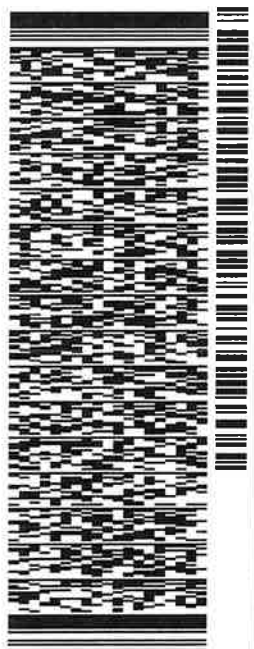
HOUSTON TX 77023

(713) 767-3500

REF 0120:405-50-45 SW

PO:

DEPT:



J181118012601uv

552J148E5/DCA5

TRK# 7724 3598 3895  
0201

MON - 11 JUN 10:30A  
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B5 EIXA

77023  
TX-US IAH



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JUN 11 2018

REGION 12

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**Stengl, Burgess**

---

**From:** Stutz, Matt  
**Sent:** Thursday, June 28, 2018 11:59 AM  
**To:** Stengl, Burgess  
**Subject:** FW: Blue Ridge OCP Mod  
**Attachments:** 20180613083841470.pdf

Note that [redacted] is an external email. Forward unfamiliar emails to [infosec.phishing@republicservices.com](mailto:infosec.phishing@republicservices.com)

Here are the first two (FedEx confirmation of deliver to Austin and e-mail acknowledging receipt). Let me track down what I can find for the region submittal.

**Matt K. Stutz, P.E.**  
Principal

Weaver Consultants Group  
6420 Southwest Blvd. | Suite 206  
Fort Worth, TX 76109  
O: 817-735-9770 | F: 817-735-9775 | [redacted]  
[www.wcgrp.com](http://www.wcgrp.com) |



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**From:** Steve Odil [<mailto:steve.odil@tceq.texas.gov>]  
**Sent:** Friday, June 15, 2018 8:46 AM  
**To:** Stutz, Matt  
**Cc:** Chance Goodin <[chance.goodin@tceq.texas.gov](mailto:chance.goodin@tceq.texas.gov)>; Matthew Udenenwu <[matthew.udenenwu@tceq.texas.gov](mailto:matthew.udenenwu@tceq.texas.gov)>; Jason Ybarra <[Jason.Ybarra@tceq.texas.gov](mailto:Jason.Ybarra@tceq.texas.gov)>  
**Subject:** Blue Ridge OCP Mod

Matt:

The modification to add the Odor Control Plan at Blue Ridge looks great, but will be processed with public notice. Please provide the landowner map/list and a URL for on-line posting as soon as you can. If you have any questions, feel free to call. I plan to be out Monday and Tuesday.

Thanks  
Steve

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JUN 28 11 59 AM '18  
6/28/18





ORIGIN ID:GLEA (817) 735-9770  
MATT K. STUTZ P.E.  
WEAVER CONSULTANTS GROUP, LLC  
6420 SOUTHWEST BLVD.  
SUITE 206  
FORT WORTH, TX 76109  
UNITED STATES US

SHIP DATE: 08 JUN 18  
ACT WGT: 1.00 LB  
CAD: 4928807/INET3980  
BILL SENDER

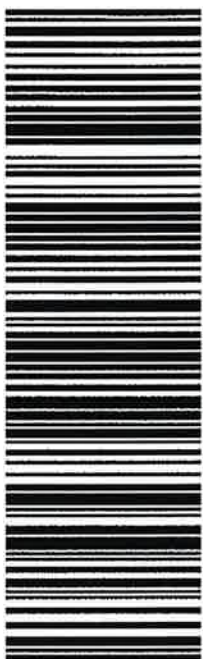
TO ATTN: STEVE ODIL  
TCEQ - MC 124  
12100 PARK THIRTY FIVE CIR BLDG F

AUSTIN TX 78753  
(512) 239-6732  
REF: 0120-405-50-45 SW  
DEPT:



TRK# 7724 3597 6014  
0201  
MON - 11 JUN 10:30A  
PRIORITY OVERNIGHT

B2 MMRA  
TX-US 78753  
AUS



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**772435976014**

Ship date:  
Fri 6/08/2018

Actual delivery:  
Mon 6/11/2018 8:25 am

**Weaver Consultants Group, LLC**  
Matt K. Stutz, P.E.  
Suite 206  
6420 Southwest Blvd.  
Fort Worth, TX US 76109  
817 735-9770

**Delivered**

Signed for by: J. ROBERT



**TCEQ - MC 124**  
Attn: Steve Odell  
12100 PARK THIRTY FIVE CIR  
BLDG F  
AUSTIN, TX US 78753  
512 239-6732

**Travel History**

Date/Time	Activity	Location
- 6/11/2018 - Monday		
8:25 am	Delivered	AUSTIN, TX
7:46 am	On FedEx vehicle for delivery	AUSTIN, TX
7:43 am	At local FedEx facility	AUSTIN, TX
- 6/09/2018 - Saturday		
6:32 pm	At destination sort facility	AUSTIN, TX
2:35 pm	Departed FedEx location	FORT WORTH, TX
- 6/08/2018 - Friday		
10:08 pm	Arrived at FedEx location	FORT WORTH, TX
9:45 pm	Left FedEx origin facility	FORT WORTH, TX
6:23 pm	Picked up	FORT WORTH, TX
3:59 pm	Shipment information sent to FedEx	

**Shipment Facts**

Tracking Number	772435976014	Service	FedEx Priority Overnight
Weight	6 lbs / 2.72 kgs	Dimensions	12x14x3 in.
Delivery attempts	1	Delivered To	Mailroom
Total pieces	1	Total shipment weight	6 lbs / 2.72 kgs
Terms	Not Available	Shipper reference	0120-405-50-45 sw
Packaging	FedEx Box	Special handling section	Deliver Weekday
Standard transit	6/11/2018 by 10:30 am		

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MATT K STUTZ, P.E.  
WEAVER CONSULTANTS GROUP, LLC  
6420 SOUTHWEST BLVD.  
SUITE 206  
FORT WORTH, TX 76109  
UNITED STATES US

SHIP DATE: 08 JUN 18  
ACTWG: 1.00 LB  
CAD: 4928807/NET3980  
BILL SENDER

TO TCEQ REGION 12

5425 POLK AVENUE  
SUITE H

HOUSTON TX 77023

(713) 767-3500 REF: 01204055045 SW  
PO: NV: DEPT:



J161118912691uu

552J148E5DCA5

TRK# 7724 3598 3895  
0201

MON - 11 JUN 10:30A  
PRIORITY OVERNIGHT

B5 EIXA

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6/7/18





FedEx<sup>®</sup> Tracking

**772435983895**

Ship date: <b>Fri 6/08/2018</b>	<p><b>Delivered</b> Signed for by: T.STEVENSON</p>	Actual delivery: <b>Mon 6/11/2018 10:03 am</b>
Fort Worth, TX US		HOUSTON, TX US

---

**Travel History**

▲ Date/Time	Activity	Location
- 6/11/2018 - Monday		
10:03 am	Delivered	Houston, TX
7:28 am	On FedEx vehicle for delivery	HOUSTON, TX
7:21 am	At local FedEx facility	HOUSTON, TX
- 6/09/2018 - Saturday		
8:56 pm	At destination sort facility	HOUSTON, TX
4:11 pm	Departed FedEx location	FORT WORTH, TX
- 6/08/2018 - Friday		
10:08 pm	Arrived at FedEx location	FORT WORTH, TX
9:45 pm	Left FedEx origin facility	FORT WORTH, TX
6:23 pm	Picked up	FORT WORTH, TX
4:00 pm	Shipment information sent to FedEx	

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**Shipment Facts**

Tracking Number	772435983895	Service	FedEx Priority Overnight
Weight	3 lbs / 1.36 kgs	Delivered To	Receptionist/Front Desk
Total pieces	1	Total shipment weight	3 lbs / 1.36 kgs
Terms	Shipper	Shipper reference	0120-405-50-45 sw
Packaging	FedEx Box	Special handling section	Deliver Weekday
Standard transit	6/11/2018 by 10:30 am		

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# ATTACHMENT 5





June 28, 2018

Ms. Reyna Loosmore  
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 6/15/2018  
RN102610102

Dear Ms. Loosmore:

Your Exit Interview Form ("Form") provided to BRLF on June 15, 2018, requested that Blue Ridge Landfill TX, LP ("BRLF") provide documentation showing the BRLF website was operational on May 1, 2018. The Form states that BRLF has already provided adequate proof that the odor complaint website was active on May 5, 2018. Your request is likely tied to the BRLF Odor Control Plan ("OCP") Implementation Schedule submitted with the OCP on April 5, 2018, and approved by TCEQ on April 10, 2018. That Implementation Schedule included the directive that "(w)ithin three weeks after Executive Director approval of the Plan, the 24-hour Odor Complaint Hotline /Message-line and website will be activated."

In response to your request, BRLF is providing a computer screenshot as documentation that the website was activated on January 31, 2017. That screenshot is attached to this letter. The screenshot, an email from the website vendor to Brad Kiesling of Republic Services stating the website is working and including the URL <http://blueridgelandfill.com/>, is dated January 31, 2017. That is same URL in use today for access to the BRLF website. The date is shown in the upper right hand corner of the page.

We believe that this attached document properly demonstrates BRLF's compliance with the OCP Implementation Schedule directive that the website was active on May 1, 2018.

RECEIVED


JUN 29 2018

REGION 12



Ms. Reyna Loosmore  
June 28, 2018  
Page 2

Sincerely,

A handwritten signature in blue ink that reads "Burgess Stengel". The signature is written in a cursive style with a large initial 'B'.

Burgess Stengel  
Environmental Manager

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



☆ Andrew Sapiens ▾ To: Klesing, Brad; - Cc: Johnson, Marquita, Gonzalez, Lorenzo, don@tervorcreative.com

1/5/17, 9:43 AM    

Hi Brad,

We've made the updates to push it live. It's working on our end, but it may take a while for it to show up properly for you: <http://blueridgeandfill.com/>

...

