

AIR CP_102610102_CP_20190624_INVESTIGATION_1589589_
Texas Commission on Environmental Quality
Investigation Report

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

Regulated Entity Name: BLUE RIDGE LANDFILL

Regulated Entity Number: RN102610102

Investigation # 1589589

Investigator: DAVID BROUSSARD

Conducted: 06/24/2019 -- 06/25/2019

Incident Numbers

Site Classification MAJOR SOURCE

NAIC Code: 562212

NAIC Code: 486210

SIC Code: 1521

SIC Code: 4922

SIC Code: 4953

INFORMATION COPY

Program(s): AIR OPERATING PERMITS

Investigation Type: Compliance Investigation

Location: LOCATED ON 2200 FM 521

Additional ID(s): FG0536E
1472

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

Local Unit: REGION 12 - HOUSTON

Activity Type(s): SPCI - AIR SPCI - TITLE V SITE
PARTIAL COMPLIANCE INV-EPA
PCE
SFCI - AIR SFCI - TITLE V SITE FULL
COMPLIANCE INV-EPA FCE

Principal(s):

Role	Name
RESPONDENT	BLUE RIDGE LANDFILL TX LP

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	ENVIRONMENTAL SPECIALIST	MS AMY KUBINSKI	Work (281) 668-9745
REGULATED ENTITY MAIL CONTACT	ENVIRONMENTAL MANAGER	MR TIM TELEPAK	Work (281) 835-6142

Other Staff Member(s):

Role	Name
Investigator	MATTHEW PATTON
Supervisor	CHRISTOPHER HORTON
Investigator	CORBIN HENNICK
Investigator	DEREK MANGOLD
Investigator	NATALIE IZRAL
QA Reviewer	CHRISTOPHER HORTON

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Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR ANNUAL COMPLIANCE CERTIFICATION REVIEW - SPCI	Site Wide
AIR GENERIC INVESTIGATION (20 ITEMS)	Site Wide
AIR INVESTIGATION - EQUIPMENT	Site Wide
MONITORING AND SAMPLING revised 06/2013	

Investigation Comments:

INTRODUCTION/ INVESTIGATION SUMMARY

Introduction

This investigation covered the entire facility of Blue Ridge Landfill TX, LP (BRL), located in Fresno in Fort Bend County. BRL operates under Title V permit O-1472, initially issued 12/4/00 and last revised on 4/25/18. The purpose of the investigation was to determine compliance with applicable state and federal requirements of the Title V permit. The on-site portion of the investigation was completed on 6/24/19 and 6/25/19.

The surrounding land use is residential, and the nearest residential receptors are approximately 350 feet to the east of the facility on Farm-to-Market 521. The facility location map and plot plan can be found in the Central File Room in Austin.

The following TCEQ investigators participated in the on-site investigation: Mr. David Broussard, Mr. Corbin Hennick, Mr. Matthew Patton, and Mr. Derek Mangold.

BRL was represented during the course of the investigation by: Ms. Amy Kubinski, Environmental Specialist; Mr. Tim Telepak, Environmental Manager; Mr. Clint Dickerson, Division Manager; Ms. Angie Vandergriff, Senior Project Manager; and Ms. Achana Nagaraj, Air Quality Manager.

Daily Narrative

Monday, June 24th

A perimeter survey was conducted before entering the site. No significant dust, visible emissions, or odors were discovered. Weather conditions at the time included rain, heavy clouds, 68.4 degrees Fahrenheit (F), and a wind speed of 8.3 miles per hour (mph) from the north northeast. This information was collected from the Manvel Croix Park CAMS station.

TCEQ Investigators Mr. Broussard, Mr. Hennick, and Mr. Patton arrived at the facility at approximately 08:15 AM.

Facility representatives present during the opening conference included: Ms. Kabinski, Mr. Telepak, Mr. Dickerson, Ms. Vandergriff, and Ms. Nagaraj. The investigators explained the purpose, scope, and procedures of the investigation, after which the compliance status of applicable state and federal rules were reviewed. This review included 30 Texas Administrative Code (TAC) 101, 30 TAC 111, 30 TAC 115, 30 TAC 117, 30 TAC 122, 40 Code of Federal Regulations (CFR) 60, 40 CFR 61, 40 CFR 63, and a review of their Standard Permit 81004. A more in-depth review of these regulations can be found in their respective section of this report.

The investigators departed the facility at approximately 12:00 PM.

The investigators conducted 30-minute odor surveys starting at 12:15 PM downwind of the facility. There were no odors detected during these surveys.

Tuesday, June 26th

TCEQ Investigators Mr. Broussard, Mr. Hennick, and Mr. Mangold arrived at the facility at approximately 08:00 AM. Facility representatives Ms. Kabinski, Mr. Telepak, Mr. Dickerson, and Ms. Vandergriff from BRL were

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present on this day of the investigation.

Beginning at approximately 08:20 AM the investigators conducted a walk through of the facility and took readings at various wells and leachate risers using the following equipment a Toxic Vapor Analyzer (TVA) 1000B, a Jerome 605X, a MultiRAE, and an Optical Gas Imaging Camera (OGIC).

LCR-4 was monitored with a TVA 1000B which found the riser to be emitting 750 parts per million (ppm) of Volatile Organic Compound (VOC). A Jerome reading was taken which showed a hydrogen sulfide (H₂S) concentration of 1.066 ppm. The riser was then observed with the OGIC. No emissions were detected with the OGIC.

The walk through then proceeded to the leachate tanks on site; these units (EPNs: LEACHATE 1-7) were observed with the OGIC and no emissions were observed.

The parts washer (EPN: PARTSWASH) was observed in the workshop and found to be properly labeled, closed, and without unauthorized materials in the wash basin. Wells W3-136 and W3-167 were monitored with the TVA and readings of 22 ppm and 42 ppm VOC were recorded. Well W3-111 was monitored with the TVA and a reading of 680 ppm VOC was recorded. After the TVA reading was complete the Jerome was used and a reading of 32.8 parts per billion (ppb) H₂S at well W3-111 was recorded. Finally, well W3-111 was monitored with the OGIC and no emissions were observed. Well 349A was monitored with the TVA and a reading of 3 ppm VOC was recorded.

LCR 2-3 was monitored with the TVA and a reading of 4000 ppm VOC was recorded. The Jerome was used to monitor LCR 2-3 and a reading of 32.8 ppb H₂S was recorded. Finally, LCR 2-3 was observed with the OGIC. No emissions could be detected with the OGIC. Well LS 1-2 was monitored with the TVA and a reading of 2 ppm VOC was recorded. The liquid waste solidification pits were also observed by the investigators. Neither odors nor particulate matter emissions were observed at the liquid waste solidification pit.

The site walk through concluded at approximately 09:50 AM. At the end of the site walk through the investigators discussed how the investigation would proceed from this point with the facility representatives. The investigators departed the facility at approximately 10:00 AM.

The investigators conducted 30-minute odor surveys starting at 10:13 AM downwind of the facility. There were no odors detected during these surveys.

Review of the Permit Compliance Certification (PCC) Reports dated 7/2/18 and 12/28/18:

Certification Period: 12/5/17 through 6/4/18

The PCC was postmarked on: 7/2/18

The PCC was received by the Houston Region Office: 7/3/18

The PCC was submitted within the required time frame.

Certification Period: 6/5/18 through 12/4/18

The PCC was postmarked on: 12/28/18

The PCC was received by the Houston Region Office: 1/2/19

The PCC was submitted within the required time frame.

Deviation Report (DR) dated 7/2/18:

Reporting Period: 12/5/17 through 6/4/18

The DR was postmarked on: 7/2/18

The DR was received by the Houston Region Office on: 7/3/18

The DR was submitted within the required time frame.

DR dated 12/28/18:

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Reporting Period: 6/5/18 through 12/4/18

The DR was postmarked on: 12/28/18

The DR was received by the Houston Region Office on: 1/2/19

The DR was submitted within the required time frame.

The complete PCC and DRs listed above can be found in the Central File Room.

The reported deviations are discussed in further detail below in the discussion of compliance with 30 TAC 122.

Review of State Rules (30 TAC 101, 111, 115, 117, 118, and 122)

A review of the applicable chapters of 30 TAC 101, 111, 115, 117, 118, and 122 was conducted. Permit by Rule (PBR) and New Source Review (NSR) permits are reviewed separately. Specifically, records relating to the following rules were reviewed:

General Air Quality Rules
30 TAC Chapter 101

Emissions Inventory (EI) and Fees

BRL provided a copy of their EI from Financial Year (FY) 2018 and FY 2019. During FY 2018 BRL emitted 84.73 tons per year (tpy) of Particulate Matter (PM), 19.66 tpy Sulfur Dioxide (SO₂), 12.8 tpy Nitrogen Oxides (NO_x), 30.53 tpy Carbon Monoxide (CO), 33.13 tpy Volatile Organic Compounds (VOC), 22.11 tpy Hazardous Air Pollutants (HAPs), and 1.14 tpy Hydrogen Chloride (HCl). In FY 2018 BRL paid \$11,176.60 in Air Emissions Fees. In FY 2019 BRL emitted 92.12 tons per year (tpy) of Particulate Matter (PM), 77.96 tpy Sulfur Dioxide (SO₂), 36.87 tpy Nitrogen Oxides (NO_x), 132.41 tpy Carbon Monoxide (CO), 26.39 tpy Volatile Organic Compounds (VOC), 20.70 tpy Hazardous Air Pollutants (HAPs), and 3.98 tpy Hydrogen Chloride (HCl). In FY 2019 BRL paid \$21,833.44 in Air Emissions Fees. BRL appears to be in compliance with 30 TAC 101.10 and 101.27.

Maintenance, Start-up, and Shut Down (MSS) Activity

BRL stated that there were no MSS activities conducted at this facility during the compliance period.

Emissions Events

BRL stated that there were no non-reportable emissions events according to 101.201(b) during the compliance period.

Emissions Credit Banking and Trading

BRL stated that this facility does not participate in this program.

Mass Emissions Cap and Trade Program

BRL stated that this facility does not participate in this program.

Discrete Emission Credit Program

BRL stated that this facility does not participate in this program.

Control of Visible Emissions and Particulate Matter (PM)
30 TAC Chapter 111

Visible Emissions Monitoring

BRL stated that the facility uses Environmental Protection Agency Method 9 to monitor for visible emissions from the flares on site (EPNs: FLARE2011, FLARE-T, and UFLARE1). The facility provided records of the flare operations for January, March, May, June, July and October of 2018. These records demonstrate that during the reviewed months there were no recorded instances of a smoking flare at this facility. BRL appears to be in

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compliance with 30 TAC 111.111 (a)(4)(A)(ii).

Stack Height

BRL provided records demonstrating compliance with the stack height requirements outlined in 30 TAC 111.151. FLARE2011 has an effluent flow rate of 175,122 (acfm) and an effective stack height of 72. FLARE-T has an effluent flow rate of 3,223 (acfm) and an effective stack height of 18. UFLARE has an effluent flow rate of 10,742 (acfm) and an effective stack height of 27. BRL appears to be in compliance with 30 TAC 111.151.

Fire Training

BRL stated that there was no fire training conducted at the facility during the past 3 years. BRL appears to be in compliance with 30 TAC 111.205(a).

Outdoor Burning

BRL stated that there was no outdoor burning conducted at this facility during the compliance period. BRL appears to be in compliance with 30 TAC 111.209.

Control of Volatile Organic Compounds (VOC) 30 TAC Chapter 115

Storage of VOCs

BRL provided documentation demonstrating that the diesel and leachate tanks (EPNs: DIESEL1, DIESEL2, and GRPLTANKS) are exempt due to the vapor pressure of their contents. Ms. Vandergriff provided the vapor pressure of the diesel fuel which is 0.009 psia, per their permit representations. BRL stated that the vapor pressure for the leachate is conservatively estimated as having the same vapor pressure as diesel fuel, per their permit representations.

Additionally, due to the capacity of the gasoline storage tank (EPN: GASOLINE) it is exempt from control requirements per 30 TAC 115.111, as the capacity of the tank is less than or equal to 1,000 gallons. BRL appears to be in compliance with 30 TAC 115.111.

Municipal Solid Waste Landfill (MSWLF)

BRL stated they are exempt from the recordkeeping requirements in 30 TAC 115.156 as the calculated emissions rate of Non-Methane Organic Compounds (NMOC) is less than 150 Megagrams per year (Mg/yr.). In documents provided to the investigators, the facility, in 2017, claimed that 398.55 Mg/yr. of NMOC was generated with a collection efficiency of 75%, with 99.64 Mg/yr. emitted. The documents provided to investigators showed that in 2018 the facility claimed an NMOC emissions 431.63 Mg/yr. with a collection efficiency of 75%, with 107.91 Mg/yr. emitted. BRL appears to be in compliance with 30 TAC 115.156.

Loading and Unloading of VOCs

BRL stated that no testing was conducted in accordance with 30 TAC 115.215 at this facility during the 3 most recent compliance periods. The facility provided a picture of the written procedures for preventing and reporting spills during VOC transfer operations, which is how the facility prevents visible leaks, fumes, and significant odors from occurring. BRL appears to be in compliance with 30 TAC 115.214.

Solvent-Using Processes

The facility claims that there has never been any surface coating conducted at this site. The PAINT EPN was added initially in case the facility decided to paint trash containers on site. The facility stated that this has never occurred at this particular facility. BRL appears to be in compliance with 30 TAC 115.426.

Control of Nitrogen Compounds (NOx) 30 TAC Chapter 117

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GN041672 operated for a total of 10 hours during the compliance period. GN942233 operated for a total of 138 hours during the compliance period. BRL provided records for the entire compliance period outlining when the generators were operated and why the generator was operated. All instances of operation were attributed to emergencies. Additionally, the runtime for these units represents less than 10% of the 8,760 hour yearly operational period the facility claims. BRL appears to be in compliance with the recordkeeping requirements related to stationary engines as required by 30 TAC 117.345(f).

Control of Air Pollution Episodes
30 TAC Chapter 118

BRL is located in Fort Bend County. Facilities located in Fort Bend County are not required to have an Emission Reduction Plan. 30 TAC Chapter 118 is not applicable.

Federal Operating Permit (FOP) Program
30 TAC Chapter 122

The requirements of this section are covered within the other sections of this report.

Discussion of Reported Deviations

There were 4 deviations reported. The investigator discussed the deviations with Ms. Amy Kubinski, Environmental Specialist on June 24, 2019. These deviations are described below:

(1) Notification of compliance with TCEQ memorandum (2 deviations):

BRL reported 2 deviations stating that the landfill has conducted visible emissions monitoring for their flares while the landfill is operating. BRL is specifically referencing a memorandum issued by the TCEQ on 9/28/17. There are no violations related to these reported deviations.

(2) Notification receiving a Notice of Enforcement (NOE) from the TCEQ (2 deviations)

BRL reported 2 deviations acknowledging that they have received NOEs from the TCEQ during the compliance period. These deviations were previously addressed by the NOEs they referenced.

Review of Federal Regulations

A review of the applicable subparts of 40 CFR 60 - Standards of Performance for New Stationary Sources (NSPS), 40 CFR 61 - National Emission Standards for Hazardous Air Pollutants (NESHAP), and 40 CFR 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT) was conducted. Specifically, the following records were reviewed:

NSPS
40 CFR Part 60

Subpart A, Control Devices

BRL stated that all flares at this facility are unassisted flares.

BRL claims that the landfill gas is capable of sustaining a flame without the pilot light being present. The presence of a flame is confirmed using a thermocouple. The daily data included gas flow in standard cubic feet per minute (SCFM), flare temperature and flare tip velocity. BRL claims that they do not monitor the pilot flame while the flare is not in service as the propane pilot light is not needed to sustain a flame in the flare. During review of this data it was discovered that the South Flare (EPN: FLARE-T) was not operating with a flame present while landfill gas was being routed to it.

The south flare vented directly to atmosphere, with no flame present on 10/27/18 from 02:33 AM to 04:23 AM. During that timeframe the unit emitted approximately 8491.3 Standard Cubic Feet (SCF) of landfill gas to the atmosphere, which was not reported by the facility. In that time period the thermocouple temperature fell to an average temperature of 121 degrees Fahrenheit (F).

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The south flare vented directly to atmosphere, with no flame present on 10/31/18 from 6:00 PM to 9:10 PM. During that timeframe the unit emitted approximately 28,182 SCF of landfill gas, which was not reported by the facility. In that time period the thermocouple temperature fell to approximately 75 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station.

The south flare vented directly to atmosphere, with no flame present, on 11/1/18 from 3:33 PM to 6:24 PM. During that timeframe the unit emitted approximately 143,173 SCF of landfill gas to the atmosphere, which was not reported by the facility. In that time period the thermocouple temperature fell to approximately 66 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station.

For more information see Violation Tracking Number (VTN) 723978. See attachment 1 and 2.

Further these deviations were not reported in the Deviation report covering 6/5/18 to 12/4/18. For more information see VTN 723970. See attachment 3.

In addition, the flame outages were not reported in the NSPS report for the period of 6/5/18 to 12/4/18 the period. For more information, see VTN 723976. See Attachment 3, 5, 6, 7, and 8.

Subpart Kb, Volatile Organic Liquids Storage Vessels

BRL provided documentation demonstrating that the tanks (EPNs: DIESEL, DIESEL 2, GASOLINE, and GRPLTANKS) at this facility are not subject to this subsection. Due to the vapor pressure of the contents of (EPNs: DIESEL, DIESEL2, and GRPLTANKS) these tanks are not subject to Kb regulations. The vapor pressure of the contents of these tanks is 0.009 psia, which is under the 0.507632 psia limit set in Kb. The gasoline tank (EPN: GASOLINE) has a volume of 1000 gallons, which is under the 19812.9-gallon limit set in Kb. BRL appears to be in compliance with 40 CFR 60.110b.

Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills

BRL provided a copy of the current Gas Collection and Control System (GCCS) plan submitted in December 2010 and approved January 2011, to replace the previous GCCS which was approved by the TCEQ in July 2006. As the potential NMOC production for the facility is greater than 50 Megagrams per year (Mg/yr.) a GCCS is required. This plan includes all required information. BRL appears to be in compliance with 40 CFR 60.752.

Flare data for following dates was reviewed: 12/7/2017 through 12/13/2017; 12/19/2017, 12/20/2017, 12/22/2017, 12/23/2017, 1/16/2018, 1/17/2018, 1/21/2018 through 1/25/2018; 3/6/2018 through 3/18/2018, 3/19/2018, 3/20/2018, 4/10/2018, 4/11/2018, 4/13/2018, 4/14/2018, 4/15/2018, 4/22/2018, 4/23/2018, 4/25/2018 through 4/28/2018; 5/4/2018 through 5/8/2018, 5/14/2018, 5/15/2018, 5/16/2018, 5/28/2018, 5/29/2018, 7/2/2018 through 7/6/2018, 7/11/2018, 7/12/2018, 7/24/2018 through 7/27/2018, 7/30/2018, 7/31/2018, 8/20/2018, 8/21/2018, 9/15/2018 through 9/19/2018, 9/22/2018, 9/23/2018, 10/24/2018 through 10/27/2018, 10/31/2018, 11/1/2018, 11/2/2018, 11/14/2018, 11/15/2018, 12/9/2018, 12/10/2018, and 12/11/2018. During the course of the investigation, it was discovered the Enclosed Flare (EPN: FLARE2011) failed to maintain the minimum temperature as referenced in the most recent performance test. For more information see VTN 723976. See attachments 6, 7, and 8. Further these low temperature deviations were not reported in the Deviation report covering 6/5/18 to 12/4/18 and the Deviation Report covering 12/5/17 to 6/4/18. For more information see VTNs 723935 and 723970. See attachment 5.

During the course of investigation, it was discovered the Rental Utility Flare (EPN: S3UFLARE1) had a malfunction of its thermocouple from 7/24/18 to 7/31/18 and on 11/15/18. For more information see VTN 726471. See attachment 4.

Further these thermocouple monitoring outage deviations were not reported in the Deviation report covering 6/5/18 to 12/4/18 and the Deviation Report covering 12/5/17 to 6/4/18. For more information see VTNs 723935 and 723970. See attachment 3, and 5.

BRL provided the monitoring records for the entire compliance period for the GCCS wells. This information

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included the oxygen content of the well, the pressure at the wellhead, and the temperature in the well. All parameters were within normal levels. BRL appears to be in compliance with 40 CFR 60.753 (c).

BRL provided the results of the Surface Emissions Monitoring for the 1st, 2nd, 3rd, and 4th quarterly surface emissions monitoring for 2018. In the first quarter there were 30 exceedances which were all repaired and retested. In the second quarter there were 38 exceedances which were all repaired and retested. In the third quarter there were 25 exceedances which were all repaired and retested. In the fourth quarter there were 31 exceedances which were all repaired and retested. BRL appears to be in compliance with 40 CFR 60.753 (d).

BRL provided a copy of their initial design capacity report dated 6/6/1996, in this notification the maximum design capacity reported was 11.8×10^6 Mg. The current calculations show that the facility is designed to accept 93,309,396 Mg of solid waste. The facility provided the investigators with a map of the facility which outlined the size of the facility as well as where solid waste can be stored. The Non Methane Organic Compound (NMOC) emissions rate is greater than 50 Mg/yr. as such they do not need to submit the report outlined in 40 CFR 60.757 (b)(3). BRL appears to be in compliance with 40 CFR 60.757 (a-c).

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engine (SI ICE)

The emergency generators at this facility (EPNs: GENENG1 and GENENG2) use diesel fuel exclusively. As such this subpart is not applicable. BRL appears to be in compliance with 40 CFR 60.4230.

NESHAP
40 CFR Part 61

Subpart C, National Emission Standard for Asbestos

BRL representatives stated that the facility does accept asbestos containing waste material (ACWM). The facility stated the entire facility is fenced off in such a way as to deter access by the general public. Additionally, the facility provided photos of the warning signs posted advising people that this is an asbestos disposal site. BRL appears to be in compliance with 40 CFR 61.154 (b).

In a response to a records request Ms. Kubinski stated that "When asbestos is received onsite, it is immediately buried with 6 inches of soil or a non-asbestos containing material. The area is also covered with 6 inches of soil or a non-asbestos containing material at the end of the operating day." BRL appears to be in compliance with 40 CFR 61.154 (c).

BRL provided copies of the hazardous waste manifests from the compliance period. This included 106 individual waste manifests. The waste manifests had all required information, including the contact information for the generator, the transporter, the quantity of waste in cubic yards, and the date of receipt. BRL appears to be in compliance with 40 CFR 61.154 (e).

BRL provided records showing where the ACWM has been buried and how much of the material was stored there. The records for December 2017 through December 2018 were reviewed. BRL appears to be in compliance with 40 CFR 61.154 (f).

The facility provided letter dated 12/1/17 and 11/4/16 which give the required 45-day notice (40 CFR 61.154(j)) that there is a potential for disturbing previously disposed of ACWM. BRL appears to be in compliance with 40 CFR 61.154 (j).

MACT
40 CFR Part 63

Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engine (RICE)

BRL stated that both generators on site (EPN: GENENG1 and GENENG2) are emergency generators. The facility stated that the maintenance schedule is maintained per manufacturer specifications. GN041672 operated for a total of 10 hours during the compliance period. GN942233 operated for a total of 138 hours during the compliance period. BRL provided records for the entire compliance period outlining when the generators were

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operated as well as the dates when maintenance was performed. The facility provided a photograph demonstrating that the runtime meter is in place for the backup generators. BRL appears to be in compliance with 40 CFR 63.6625, 63.6640, and 63.6655.

Subpart CCCCC, Gasoline Dispensing Facilities

BRL has one gasoline tank (EPN: GASOLINE) with an average monthly through put of 453 gallons per month and is subject to 40 CFR 63.11116. This subpart requires this tank to be handled in a safe responsible manner. The facility provided a picture of the written procedures for preventing and reporting spills during VOC transfer operations, which is how the facility prevents visible leaks, fumes, and significant odors from occurring. BRL appears to be in compliance with 40 CFR 63.11116.

Standard Permit Incorporated into Title V 30 TAC Chapter 116

Standard Permit 81004

BRL provided a copy of the most up to date version of their Standard Permit. This included the emissions rates which were updated and approved on 10/28/16 by the TCEQ. The new emissions rates for the enclosed flare, south flare, and rental utility flare (EPNs: FLARE2011, FLARE-T, and S3UFLARE1) were reviewed for the following dates: 1/11/18, 1/31/18, 2/15/18, 3/8/18, 3/12/18, 3/14/18, 4/11/18, 7/4/18, 7/31/18, and 11/27/18. There were no exceedances of the hourly emissions rates for CO, NOx, SO2, PM2.5, or PM10 on these days.

The facility provided a copy of their initial design capacity report dated 6/6/1996. In this notification the maximum design capacity reported was 11,800,000 Mg. The current design capacity of the facility is 93,309,396 Mg of solid waste. The current NMOC emission rate of 107.91 MG/yr. during the compliance period.

BRL stated that the only PBR claimed by the facility is 106.454 for Parts Washers. This is discussed below in the PBR section. Permitted emissions for the PBR are authorized under this standard permit. BRL appears to be in compliance with 30 TAC 330.995 (a-d, and f).

Additional information was requested from BRL about the operations of the enclosed flare (EPN: FLARE2011) and the south flare (EPN: FLARE-T) which was not provided. For information on the failure to provide information for the enclosed flare see (EPN: FLARE2011) see VTN 723983. For information on the failure to provide information for the south flare (EPN: FLARE-T) see VTN 724029. See attachment 9 for more information on these violations.

PBR 30 TAC Chapter 106

PBR 106.454, Parts washer:

During the site walk through the parts washer was observed to be closed and had the proper safety and use instructions posted near the unit. Upon inspection of the interior no unauthorized materials were found in the wash basin. This unit is a remote reservoir unit which requires no PI-7 form. BRL appears to be in compliance with 30 TAC 106.454.

Exit Interview

On August 30, 2019, the investigator conducted an exit interview with Ms. Kubinski. An Exit Interview Form was completed by the investigator and acknowledged by Ms. Kubinski. The Exit Interview Form is provided in Attachment #10.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

Blue Ridge Landfill is a municipal solid waste landfill. More detailed process descriptions can be found in the TCEQ Central File Room.

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BACKGROUND

Agreed Orders, Court Orders, and Other Compliance Agreements

Based on a review of CCEDS, regional office files, and the enforcement database, the following Agreed Order (AO) pertaining to violations of air quality regulations was issued by the TCEQ within the past 5 years:

2016-1923-AIR-E
Prior Enforcement Issues

Based on a review of CCEDS, there were NOV's issued by the TCEQ within the past five years. There are no repeat violations.

Complaints

Information regarding complaints for this site can be found in the Central Office file room.

ADDITIONAL INFORMATION

Conclusions, Recommendations, and Current Enforcement Actions

Based on this investigation, alleged violations were documented. For more information, see the alleged violations listed below.

Additional Issues

No additional issues were noted during this investigation.

REPORT ATTACHMENTS

1. South Flare data
2. Landfill gas sent to unlit flare calculation
3. PCC and DR 6/5/18-12/4/18
4. Rental Utility Flare Data
5. Excerpt from NSPS Report December 2018
6. Enclosed Flare Data
7. PCC and DR 12/5/17-6/4/18
8. Excerpt from NSPS Report July 2018
9. BRL response to 8/14/18 records request Enclosed Flare Data
10. Exit Interview Form

NOV Date 08/30/2019 **Method** WRITTEN

**OUTSTANDING ALLEGED VIOLATION(S)
ASSOCIATED TO A NOTICE OF VIOLATION**

Track Number: 723935

Compliance Due Date: 09/30/2019

Violation Start Date: 7/5/2018

30 TAC Chapter 122.143(4)
30 TAC Chapter 122.145(2)(A)
5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(3)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

BLUE RIDGE LANDFILL - FRESNO

6/24/2019 to 6/25/2019 Inv. # - 1589589

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Failure to report all instances of deviations in the deviation report for the 12/5/17 through 6/4/18 reporting period.

During the course of the records review conducted on 6/24/19 through 6/25/19, it was discovered that BRL reported 2 deviations during this time period. Two unreported deviations were discovered to have had occurred at the Blue Ridge Landfill and are listed below:

- A. Failure to operate the Enclosed Flare (EPN: FLARE2011) within the parameters established in the most recent performance test.
- B. Failure to monitor the pilot flame of the rental utility flare (EPN: S3UFLARE1).

These issues should have been reported in the deviation report covering the 12/5/17 through 6/4/18 reporting period. This constitutes a violation of 30 Texas Administrative Code 122.145 (2)(A), which states "The permit holder shall report, in writing, to the executive director all instances of deviations, the probable cause of the deviations, and any corrective actions or preventative measures taken for each emission unit addressed in the permit."

This further constitutes a violation of General Operating Permit Term (b) (3); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track Number: 723970

Compliance Due Date: 09/30/2019

Violation Start Date: 1/4/2019

30 TAC Chapter 122.143(4)
30 TAC Chapter 122.145(2)(A)
5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(3)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

Failure to report all instances of deviations in the deviation report for the 6/5/18 through 12/4/18 reporting period.

During the course of the records review conducted on 6/24/19 through 6/25/19, it was discovered that BRL reported 2 deviations in the deviation report for the 6/5/18 through 12/4/18 reporting period. During this time period 7 instances of unreported deviations were discovered to have had occurred at the Blue Ridge Landfill as follows:

- A. Failure to operate the Enclosed Flare (EPN: FLARE2011) within the parameters established in the most recent performance test (3 occasions).
- B. Venting landfill gas to South Flare (EPN: FLARE-T) while it was unlit (3 occasions).
- C. Failure to monitor the pilot flame of the Rental Utility Flare (EPN: S3UFLARE1).

These issues should have been reported in the deviation report covering 6/5/18 through 12/4/18. This constitutes a violation of 30 Texas Administrative Code 122.145 (2)(A), which states "The permit holder shall report, in writing, to the executive director all instances of deviations, the probable cause of the deviations, and any corrective actions or preventative measures taken for each emission unit addressed in the permit."

This further constitutes a violation of General Operating Permit Term (b) (3); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

BLUE RIDGE LANDFILL - FRESNO

6/24/2019 to 6/25/2019 Inv. # - 1589589

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Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track Number: 723976

Compliance Due Date: 09/30/2019

Violation Start Date: 7/5/2018

30 TAC Chapter 122.143(4)

40 CFR Chapter 60.757(f)(3)

40 CFR Chapter 60.758(e)(1)(i)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)

PERMIT 1472, General Operating Permit Term (b)(6)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

Failure report all instances of improper flare operation.

During the course of the investigation conducted 6/24/19 through 6/25/19, it was discovered that on three occasions the South Flare (EPN: FLARE-T) was not operational for at least 1 hour and this was not reported in the annual NSPS report dated December 2018. Each occasion is listed below:

A. During the period from 02:33 AM to 04:23 AM on 10/27/18 the flare had landfill gas being routed to it without a flame present. In that time period the thermocouple temperature fell to approximately 121 degrees Fahrenheit (F) on average. Additionally, according to gas flow data provided by Blue Ridge Landfill approximately 8,491.3 standard cubic feet of landfill gas went directly to atmosphere.

B. During the period between 6:00 PM and 9:10 PM on 10/31/18 the flare had landfill gas being routed to it without a flame present. In that time period the thermocouple temperature fell to approximately 75 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station. Additionally, according to gas flow data provided by Blue Ridge Landfill approximately 28,182.5 standard cubic feet of landfill gas went directly to atmosphere.

C. During the period between 12:43 PM and 6:24 PM on 11/1/18 the flare had landfill gas being routed to it without a flame present. In that time period the thermocouple temperature fell to approximately 66 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station. Additionally, according to gas flow data provided by Blue Ridge Landfill approximately 142,358.8 standard cubic feet of landfill gas went directly to atmosphere.

During the course of the investigation conducted 6/24/19 through 6/25/19, it was discovered that on three occasions the Enclosed Flare (EPN: FLARE2011) was not operated within the parameters set in the most recent performance test and this was not reported in the annual NSPS report dated December 2018.

D. On 5/28/18 from 12:09 AM to 11:00 PM the flare failed to achieve the 1548 degrees Fahrenheit (F) minimum temperature established in the most recent performance test. The greatest average temperature recorded during this period was from 10:00 to 11:00. All 3-hour periods except 10:00 to 12:00 should have been reported as these periods had an average temperature below 1499 F. The lowest 3-hour average occurred between the 04:00 to 06:00 periods when the average temperature fell to 1053.52 F.

E. On 10/26/18 from 12:00 AM to 9:43 PM the flare failed to achieve the 1548 F minimum temperature established in the most recent performance test. All 3-hour periods should have been reported as these periods had an average temperature below 1499 F. The lowest 3-hour average occurred between the 13:00 to 15:00 periods when the average temperature fell to 431.1 F.

BLUE RIDGE LANDFILL - FRESNO

6/24/2019 to 6/25/2019 Inv. # - 1589589

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F. On 11/1/18 from 09:04 AM to 12:04 PM the flare failed to achieve the 1548 F minimum temperature established in the most recent performance test. This period from should have been reported as this period had an average temperature below 1499 F. The 3-hour average temperature fell to 1457.01 F.

This constitutes a violation of 40 Code of Federal Regulations (CFR) 60.757 (f)(3), which states "Each owner or operator of a landfill seeking to comply with § 60.752(b)(2) using an active collection system designed in accordance with § 60.752(b)(2)(ii) shall submit to the Administrator annual reports of the recorded information in (f)(1) through (f)(6) of this paragraph... For enclosed combustion devices and flares, reportable exceedances are defined under § 60.758(c)... Description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not This also constitutes a violation of 40 Code of Federal Regulations (CFR) 60.758 (c)(1)(i), which states " The following constitute exceedances that shall be recorded and reported under § 60.757(f): (i) For enclosed combustors except for boilers and process heaters with design heat input capacity of 44 megawatts (150 million British thermal unit per hour) or greater, all 3-hour periods of operation during which the average combustion temperature was more than 28 oC below the average combustion temperature during the most recent performance test at which compliance with § 60.752(b)(2)(iii) was determined."

This further constitutes a violation of General Operating Permit (GOP) Term (b) (2), and GOP Term (b)(6); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).operating."

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track Number: 723978

Compliance Due Date: 09/30/2019

Violation Start Date: 10/27/2018

30 TAC Chapter 101.221(a)
30 TAC Chapter 122.143(4)
40 CFR Chapter 60.18(c)(2)
5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(43)(H)

PERMIT 1472, General Operating Permit Term (b)(8)(F)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

Failure to operate the south flare (EPN: FLARE-T) with a flame present at all times.

During the course of investigation conducted on 6/24/19 through 6/25/19, it was discovered that Blue Ridge Landfill operated the south flare without a flame present on three occasions as listed below:

A. The south flare vented directly to atmosphere, with no flame present on 10/27/18 from 02:33 AM to 04:23 AM. During that timeframe the unit emitted approximately 8491.3 Standard Cubic Feet (SCF) of landfill gas to the atmosphere. In that time period the thermocouple temperature fell to an average temperature of 121 degrees Fahrenheit (F).

B. The south flare vented directly to atmosphere, with no flame present on 10/31/18 from 6:00 PM to 9:10 PM. During that timeframe the unit emitted approximately 28,182 SCF of landfill gas. In that time period the thermocouple temperature fell to approximately 75 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station.

C. The south flare vented directly to atmosphere, with no flame present, on 11/1/18 from 3:33 PM to 6:24 PM. During that timeframe the unit emitted approximately 143,173 SCF of landfill gas to the atmosphere. In that time

BLUE RIDGE LANDFILL - FRESNO

6/24/2019 to 6/25/2019 Inv. # - 1589589

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period the thermocouple temperature fell to approximately 66 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station.

This constitutes a violation of 40 Code of Federal Regulations 60.18 (c)(2), which states "Flares shall be operated with a flame present at all times..."

Additionally, this constitutes a violation of 30 Texas Administrative Code 101.221(a), which states "All pollution emission capture equipment and abatement equipment must be maintained in good working order and operated properly during facility operations. Emission capture and abatement equipment must be considered to be in good working order and operated properly when operated in a manner such that each facility is operating within authorized emission limitations."

This further constitutes a violation of General Operating Permit Term (b)(8)(F), and (b)(43)(H); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track Number: 723983

Compliance Due Date: 09/30/2019

Violation Start Date: 8/20/2019

30 TAC Chapter 116.615(8)

30 TAC Chapter 122.143(4)

30 TAC Chapter 122.144(4)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/29/2019

Failure to provide requested emissions data for the enclosed flare.

On 8/14/19 a records request was submitted to Blue Ridge Landfill requesting specific emissions data from the enclosed flare (EPN: FLARE2011) for the following dates and times:

A. 5/25/18 at 00:00 AM to 5/28/18 at 11:00 PM

B. 10/26/18 from 11:00 AM to 10/27/18 at 01:00 PM

C. 11/1/18 from 08:00 AM to 12:00 PM.

Blue Ridge Landfill did not provide the requested emissions data for the dates and times above. This constitutes a violation of 30 Texas Administrative Code (TAC) 122.144 (4), which states "Records required by the permit, including confidential information, shall be provided, upon request, in a legible form, to representatives from the commission or the local air pollution control program having jurisdiction within a reasonable period of time."

Additionally, this constitutes a violation of 30 TAC 116.615 (8), which states "A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the United States Environmental Protection Agency, or any air pollution control agency having jurisdiction."

This further constitutes a violation of General Operating Permit Term (b)(2); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

BLUE RIDGE LANDFILL - FRESNO

6/24/2019 to 6/25/2019 Inv. # - 1589589

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Track Number: 724029

Compliance Due Date: 09/30/2019

Violation Start Date: 8/20/2019

30 TAC Chapter 116.615(8)
30 TAC Chapter 122.143(4)
30 TAC Chapter 122.144(4)
5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/29/2019

Failure to provide requested emissions data for the South Flare.

On 8/14/19 a records request was sent to Blue Ridge Landfill requesting specific emissions data from the south flare (EPN: FLARE-T) for the following dates and times:

- A. 10/27/18 from 01:00 AM to 06:00 AM
- B. 10/31/18 from 4:00 PM to 11:00 PM
- C. 11/1/18 from 11:00 AM to 9:00 PM

Blue Ridge Landfill indicated that there were no emissions from the south flare during these times; however, the facility's records indicate there was flow to the flare. The requested emissions data was not provided. This constitutes a violation of 30 Texas Administrative Code (TAC) 122.144 (4), which states "Records required by the permit, including confidential information, shall be provided, upon request, in a legible form, to representatives from the commission or the local air pollution control program having jurisdiction within a reasonable period of time."

Additionally, this constitutes a violation of 30 TAC 116.615 (8), which states "A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the United States Environmental Protection Agency, or any air pollution control agency having jurisdiction."

This further constitutes a violation of General Operating Permit Term (b)(2); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track Number: 726471

Compliance Due Date: 09/30/2019

Violation Start Date: 10/27/2018

30 TAC Chapter 122.143(4)
40 CFR Chapter 60.18(f)(2)
5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

BLUE RIDGE LANDFILL - FRESNO

6/24/2019 to 6/25/2019 Inv. # - 1589589

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Failure to monitor the presence of a flame at all times.

During the course of investigation, it was discovered that on three occasions BRL failed to monitor the presence of a flame on the rental utility flare (EPN: S3UFLARE1) as the thermocouple was not functioning properly. These instances occurred on 7/24/18 to 7/31/18 and on 11/15/18. This constitutes a violation of 60.18 (f)(2), which states "The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame."

This further constitutes a violation of General Operating Permit Term (b)(2); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Signed



Environmental Investigator

Date

8/30/19

Signed



Supervisor

Date

8/30/19

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ Letter to Facility (specify type) : _____

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

☒ Other (specify) :

See list of report
attachments

Attachment 1
South Flare Data
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
Pages 4

Blue Ridge Landfill
FLARE-T (South Utility Flare)

Investigation Type: SPCT
Air Account NO: FG-0536-E

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Attachment Page	Velocity (ft/sec)
10/26/2018 22:02	1061.39	953.67		30.71
10/26/2018 22:12	1020.90	969.45		32.05
10/26/2018 22:23	1004.98	1004.89		31.79
10/26/2018 22:33	1048.73	996.74		30.39
10/26/2018 22:43	1040.46	1016.85		30.76
10/26/2018 22:53	994.52	1033.75		29.81
10/26/2018 23:03	1006.57	1041.45		29.84
10/26/2018 23:13	975.52	1064.45		30.65
10/26/2018 23:23	976.43	1065.57		31.25
10/26/2018 23:33	1003.16	1045.49		31.93
10/26/2018 23:43	1022.49	908.96		30.77
10/26/2018 23:53	1045.01	1017.82		29.60
10/27/2018 0:03	1007.10	1033.00		29.65
10/27/2018 0:13	968.79	1001.00		29.18
10/27/2018 0:23	970.38	987.62		30.57
10/27/2018 0:33	955.01	1105.37		29.39
10/27/2018 0:43	1000.51	1040.18		29.97
10/27/2018 0:53	961.67	993.30		30.92
10/27/2018 1:03	980.74	1005.11		30.45
10/27/2018 1:13	1011.88	960.63		28.99
10/27/2018 1:23	996.56	978.87		26.15
10/27/2018 1:33	948.65	867.17		21.77
10/27/2018 1:43	855.86	806.61		18.13
10/27/2018 1:53	712.53	754.27		3.68
10/27/2018 2:03	593.37	669.01		2.74
10/27/2018 2:13	120.31	517.29		2.55
10/27/2018 2:23	89.67	265.08		2.42
10/27/2018 2:33	83.61	164.82		2.42
10/27/2018 2:43	79.28	119.09		2.29
10/27/2018 2:53	79.21	92.90		2.22
10/27/2018 3:03	75.04	76.72		2.17
10/27/2018 3:13	72.61	67.44		2.11
10/27/2018 3:23	71.02	62.40		2.04
10/27/2018 3:33	68.90	59.13		2.00
10/27/2018 3:43	66.62	57.42		1.93
10/27/2018 3:53	65.56	369.51		1.91
10/27/2018 4:03	63.29	178.92		1.88
10/27/2018 4:13	62.60	108.79		0.00
10/27/2018 4:23	61.39	78.95		0.00
10/27/2018 4:33	0.00			
10/27/2018 4:43	0.00			
10/27/2018 4:53	0.00			
10/27/2018 5:04	0.00			
10/27/2018 5:14	0.00			

Attachment
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Blue Ridge Landfill
FLARE-T (South Utility Flare)

Investigation Type: SPC I
Air Account NO: FG-0536-E

Attachment: 1
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
10/31/2018 17:40	900.97	1113.32	7.04
10/31/2018 17:50	485.01	279.47	6.48
10/31/2018 18:00	230.53	132.66	6.19
10/31/2018 18:10	211.98	93.13	5.83
10/31/2018 18:20	202.44	81.19	5.65
10/31/2018 18:30	190.85	76.80	5.46
10/31/2018 18:40	184.87	76.06	5.19
10/31/2018 18:50	178.81	76.20	4.90
10/31/2018 19:00	169.81	76.06	4.61
10/31/2018 19:10	160.26	76.06	4.46
10/31/2018 19:20	150.71	75.31	4.18
10/31/2018 19:30	145.86	75.83	3.93
10/31/2018 19:40	136.68	75.76	3.67
10/31/2018 19:50	128.65	75.54	3.34
10/31/2018 20:00	120.23	75.83	3.00
10/31/2018 20:10	109.39	75.46	2.71
10/31/2018 20:20	98.32	75.83	2.71
10/31/2018 20:30	88.54	75.83	2.54
10/31/2018 20:40	88.69	76.28	2.19
10/31/2018 20:50	83.00	75.91	2.05
10/31/2018 21:00	71.70	76.43	0.00
10/31/2018 21:10	66.93	76.72	0.00
10/31/2018 21:20	0.00	---	---
10/31/2018 21:26	0.00	---	---
10/31/2018 21:30	0.00	---	---
10/31/2018 21:41	0.00	---	---
10/31/2018 21:51	0.00	---	---
10/31/2018 21:58	0.00	---	---
10/31/2018 21:58	0.00	---	---
10/31/2018 22:01	0.00	---	---
10/31/2018 22:11	0.00	---	---
10/31/2018 22:21	0.00	---	---
10/31/2018 22:31	0.00	---	---
10/31/2018 22:41	0.00	---	---
10/31/2018 22:51	0.00	---	---
10/31/2018 23:01	0.00	---	---
10/31/2018 23:11	0.00	---	---
10/31/2018 23:21	0.00	---	---
10/31/2018 23:31	0.00	---	---
10/31/2018 23:41	0.00	---	---
10/31/2018 23:51	0.00	---	---
11/1/2018 0:01	0.00	---	---
11/1/2018 0:11	0.00	---	---
11/1/2018 0:21	0.00	---	---

Blue Ridge Landfill
FLARE-T (South Utility Flare)

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 1
Page 3 of 4
Velocity (ft/sec)

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
11/1/2018 7:42	0.00	---	---
11/1/2018 7:52	0.00	---	---
11/1/2018 8:02	0.00	---	---
11/1/2018 8:12	0.00	---	---
11/1/2018 8:22	0.00	---	---
11/1/2018 8:32	0.00	---	---
11/1/2018 8:42	0.00	---	---
11/1/2018 8:52	0.00	---	---
11/1/2018 9:02	0.00	---	---
11/1/2018 9:12	0.00	---	---
11/1/2018 9:22	0.00	---	---
11/1/2018 9:32	0.00	---	---
11/1/2018 9:42	0.00	---	---
11/1/2018 9:52	0.00	---	---
11/1/2018 10:02	0.00	---	---
11/1/2018 10:12	0.00	---	---
11/1/2018 10:22	0.00	---	---
11/1/2018 10:32	0.00	---	---
11/1/2018 10:42	0.00	---	---
11/1/2018 10:53	2285.08	522.81	0.00
11/1/2018 11:03	0.00	---	---
11/1/2018 11:13	0.00	---	---
11/1/2018 11:23	714.96	590.94	0.01
11/1/2018 11:33	0.00	---	---
11/1/2018 11:43	0.00	---	---
11/1/2018 11:53	1833.59	1008.03	49.63
11/1/2018 12:03	1694.63	1055.99	5.33
11/1/2018 12:13	1624.13	1124.90	9.01
11/1/2018 12:23	174.35	846.46	11.99
11/1/2018 12:33	294.73	289.47	12.92
11/1/2018 12:43	392.40	149.90	13.40
11/1/2018 12:53	422.71	103.80	13.77
11/1/2018 13:03	438.47	89.62	13.81
11/1/2018 13:13	450.60	86.64	14.27
11/1/2018 13:23	452.04	86.86	0.00
11/1/2018 13:33	467.05	86.94	0.00
11/1/2018 13:43	0.00	---	---
11/1/2018 13:53	0.00	---	---
11/1/2018 14:03	0.00	---	---
11/1/2018 14:13	0.00	---	---
11/1/2018 14:23	0.00	---	---
11/1/2018 14:33	0.00	---	---
11/1/2018 14:43	0.00	---	---
11/1/2018 14:53	0.00	---	---

Blue Ridge Landfill
FLARE-T (South Utility Flare)

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
11/1/2018 15:03	796.98	434.27	0.00
11/1/2018 15:13	395.35	274.18	21.87
11/1/2018 15:23	0.00	---	---
11/1/2018 15:33	715.56	93.05	24.53
11/1/2018 15:43	798.42	86.64	24.56
11/1/2018 15:53	802.73	442.69	24.59
11/1/2018 16:03	803.57	168.84	24.67
11/1/2018 16:13	804.62	93.20	24.76
11/1/2018 16:23	807.27	76.57	24.80
11/1/2018 16:33	810.30	71.97	24.81
11/1/2018 16:43	811.51	70.19	24.83
11/1/2018 16:53	811.89	69.23	24.86
11/1/2018 17:03	812.72	68.85	24.89
11/1/2018 17:13	813.63	68.56	24.91
11/1/2018 17:23	814.46	68.78	24.94
11/1/2018 17:34	815.22	68.26	24.96
11/1/2018 17:44	816.28	67.89	24.33
11/1/2018 17:54	816.81	67.22	22.93
11/1/2018 18:04	796.22	66.70	19.38
11/1/2018 18:14	750.52	66.26	0.00
11/1/2018 18:24	634.15	65.29	0.00
11/1/2018 18:34	0.00	---	---
11/1/2018 18:44	0.00	---	---
11/1/2018 18:54	0.00	---	---
11/1/2018 19:04	0.00	---	---
11/1/2018 19:14	0.00	---	---
11/1/2018 19:24	0.00	---	---
11/1/2018 19:34	0.00	---	---
11/1/2018 19:44	0.00	---	---
11/1/2018 19:54	0.00	---	---
11/1/2018 20:04	0.00	---	---
11/1/2018 20:14	0.00	---	---
11/1/2018 20:24	2090.22	1244.39	61.43
11/1/2018 20:34	2038.40	1297.86	60.86
11/1/2018 20:44	2010.31	1332.99	60.28
11/1/2018 20:54	1991.80	1344.20	60.04
11/1/2018 21:04	1972.54	1371.23	59.44
11/1/2018 21:14	1964.69	1356.30	58.91
11/1/2018 21:24	1945.20	1355.78	59.08
11/1/2018 21:34	1927.83	1356.97	58.35
11/1/2018 21:44	1933.27	1361.58	58.23
11/1/2018 21:54	1909.40	1348.65	57.89
11/1/2018 22:04	1905.54	1344.42	57.68
11/1/2018 22:14	1894.53	1347.24	57.61

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

Attachment 2

Landfill gas sent to unlit flare calculation

Blue Ridge Landfill

Blue Ridge Landfill TX LP

RN # 102610102

CN # 602820599

Permit # O-01472

06/24/2019

Pages 1

10/27/2018	Flow	Standard Cubic Feet in time span
2:33	83.61	836.1
2:43	79.28	792.8
2:53	79.21	792.1
3:03	75.04	750.4
3:13	72.61	726.1
3:23	71.02	710.2
3:33	68.9	689
3:43	66.62	666.2
3:53	65.56	655.6
4:03	63.29	632.9
4:13	62.6	626
4:23	61.39	613.9
	Total SCF	8491.3

10/31/2018	Flow	Standard Cubic Feet in time span
18:00	230.53	2305.3
18:10	211.98	2119.8
18:20	202.44	2024.4
18:30	190.85	1908.5
18:40	184.87	1848.7
18:50	178.81	1788.1
19:00	169.81	1698.1
19:10	160.26	1602.6
19:20	150.71	1507.1
19:30	145.86	1458.6
19:40	136.68	1366.8
19:50	128.65	1286.5
20:00	120.23	1202.3
20:10	109.39	1093.9
20:20	98.32	983.2
20:30	88.54	885.4
20:40	88.69	886.9
20:50	83	830
21:00	71.7	717
21:10	66.93	669.3
	Total SCF	28182.5

11/1/2018	Flow	Standard Cubic Feet in time span
15:33	715.56	7155.6
15:43	798.42	7984.2
15:53	802.73	8027.3
16:03	803.57	8035.7
16:13	804.62	8046.2
16:23	807.27	8072.7
16:33	810.3	8103
16:43	811.51	8115.1
16:53	811.89	8118.9
17:03	812.72	8127.2
17:13	813.63	8136.3
17:23	814.46	8144.6
17:34	815.22	8152.2
17:44	816.28	8162.8
17:54	816.81	8168.1
18:04	796.22	7962.2
18:14	750.52	7505.2
18:24	634.15	6341.5
	Total SCF	143173.3

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

Attachment 3
PCC and DR 6/5/18-12/4/18
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
Pages 8

TITLE V REPORT

This report is being submitted in accordance with Title 30 Texas Administrative Code (TAC) §122.145 for the reporting period June 5, 2018 through December 4, 2018.

During this reporting period, there were instances where the flare data recorder indicated sudden spikes in the flow readings. Given the fact that the data recorder plots a maximum and minimum value every eight to ten minutes and as is typical with these types of flares, sudden changes in wind, power, or other outside source can cause fluctuations in the data being recorded and are considered to be meter noise. These instantaneous erratic readings include, but are not limited to, periods when the flow readings fluctuate and cannot be read distinctly. If data spikes (meter noise) occur, these are considered to be meter noise and are not an indication of a malfunction or a deviation.

Investigation Type: SPCI
Air Account NO: EG-0536-E
Attachment: 3
Page 1 of 8



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

Permit Holder Name	Blue Ridge Landfill TX, LP	Customer Number	CN602820599
Area Name	Blue Ridge Landfill	Account Number	FG-0536-E
Operating Permit Number	O - 01472	Report Submittal Date	12/28/2018
Certification Period Start Date	6/5/2018	End Date	12/4/2018

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

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

Investigation Type: SPC I
 Air Account NO: FG-0536-E
 Attachment: 3
 Page 2 of 8



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

Permit Holder Name		Blue Ridge Landfill TX, LP				Customer Number		CN602820599
Area Name		Blue Ridge Landfill				Account Number		FG-0536-E
Report Period Start Date		6/5/2018	Report Period End Date	12/4/2018	Operating Permit Number	O-01472	Report Submittal Date	12/28/2018
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE2011 FLARE-T S3UFLARE1	N/A	517(c)	N/A	30 TAC 111.111(a)(4) (A)(ii)	Record	517-09-004	Permit	Daily

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

Investigation Type: SPCI
 Air Account NO: FG-0536-E
 Attachment: 3
 Page 3 of 8
 Page 1 of 3



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

Permit Holder Name		Blue Ridge Landfill TX, LP				Customer Number		CN602820599	
Area Name		Blue Ridge Landfill				Account Number		FG-0536-E	
Report Period Start Date		6/5/2018		Report Period End Date		12/4/2018		Operating Permit Number	
						O-01472		Report Submittal Date	
								12/28/2018	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number		Term & Condition No.		Pollutant		Regulatory Requirement Citation		Type of Requirement	
Unit ID		Group ID						SOP or GOP Index Number	
LANDFILL		N/A		517(b)(2)		N/A		30 TAC 122.143(4) & 30 TAC 122.145(2)(A)	
				N/A				Record	
								Permit	
								Monitoring Method	
								Monitoring Frequency	
								Continuous	

Dev Item No.	STEERS Incident No.	Deviation Period			No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	Time	End Date			
2	N/A	7/3/2018	-	-	Pending	A TCEQ Notice of Enforcement for Compliance Evaluation Investigation was received October 12, 2018 for 3 alleged violations.	A meeting between BRLF and TCEQ was held to further discuss the alleged violations on December 18, 2018. BRLF will provide a response to each alleged violation.
Total Deviations:					---	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

Investigation Type: SPCI
 Air Account NO: FG-0536-E
 Attachment: 3
 Page 4 of 8



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


Permit Holder Name		Blue Ridge Landfill TX, LP				Customer Number	CN602820599
Area Name		Blue Ridge Landfill				Account Number	FG-0536-E
Report Period Start Date	6/5/2018	Report Period End Date	12/4/2018	Operating Permit Number	O-01472	Report Submittal Date	12/28/2018
Operating Permit Requirement for Which Deviations are Being Reported							
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method
Unit ID	Group ID						
LANDFILL	N/A	517(b)(43)	N/A	30 TAC 101.4	Record	N/A	Permit
							Monitoring Frequency
							Continuous

Dev Item No.	STEERS Incident No.	Deviation Period			No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	Time	End Date			
3	N/A	5/9/2018	-	5/17/2018	Pending	A TCEQ Notice of Enforcement for Complaint Investigation was received October 12, 2018 for 1 alleged violation.	A meeting between BRLF and TCEQ was held to further discuss the alleged violations on December 18, 2018. BRLF will provide a response to each alleged violation.
Total Deviations: ---					Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

Investigation Type: SPI
 Air Account NO: FG-0536-E
 Attachment: 3
 Page 5 of 8

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

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

I. Identifying Information					
RN: 102610102		CN: 602820599		Account No.: FG-0536-E	
Permit No.: O-01472			Project No.:		
Area Name: Blue Ridge Landfill			Company Name: Blue Ridge Landfill TX, LP		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Semi-Annual Compliance Certification</u>					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>Scott Trebus</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i>					
Specific Dates: <u>12/28/2018</u>					
<i>Date 1</i>		<i>Date 2</i>	<i>Date 3</i>	<i>Date 4</i>	<i>Date 5</i>
<i>Date 6</i>					
Signature: <u></u>			Signature Date: <u>12/26/2018</u>		
Title: <u>Area Environmental Manager</u>					

APPENDIX E
STARTUP, SHUTDOWN, AND MALFUNCTION REPORT

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 3
Page 7 of 8

**Semi-Annual Startup, Shutdown, and Malfunction Report
for June 5, 2018 through December 4, 2018**

**for Blue Ridge Landfill
TCEQ Account No. FG-0536-E
CN 602820599 RN 102610102**

Regulatory Requirement

As per Title 40 Code of Federal Regulations (40 CFR) Part 63, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills, the Blue Ridge Landfill (Facility) is required to meet the startup, shutdown, and malfunction (SSM) requirements of the general provisions within 40 CFR Part 63. Thus, the Facility is required to implement and maintain an SSM plan for the gas collection and control system and flares. Since the Energy Facility is owned and operated by a separate entity, SSM events associated with the Energy Facility are covered by its SSM plan and are not included as part of this report. In accordance with 40 CFR Part 63, Subpart A, specifically §63.10(d)(5)(i), the Facility is required to submit a certified SSM report semi-annually, if an SSM event occurred during the reporting period. Although no reportable events occurred during the reporting period, this report is being submitted for recordkeeping purposes.

Demonstration of Compliance

The Facility implemented an SSM Plan on June 26, 2004. During the reporting period of June 5, 2018 to December 4, 2018, there were no malfunctions as defined by 40 CFR Part 63.2, and no events are believed to have caused, or had the potential to cause, any applicable emission limitation to be exceeded. Therefore, there are no startups, shutdowns or malfunctions to be reported in accordance with §63.10(d)(5)(i). Additionally, there were no revisions made to the Facility's SSM Plan during the reporting period.

Certification

The signature below indicates that I certify that the information provided within this report is true and accurate to the best of my knowledge and belief.

Duly Authorized Representative: Scott Trebus, Area Environmental Manager

Signature: 

Date: 12/26/2018

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 3
Page 8 of 8

Attachment 4
Rental Utility Flare Data
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
Pages 24

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account: FG-0536-E

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/12/2018 22:42	1947.00	1389.00	59.97
7/12/2018 22:52	1948.00	1375.00	60.01
7/12/2018 23:02	1938.00	1389.00	59.70
7/12/2018 23:12	1945.00	1391.00	59.91
7/12/2018 23:22	1944.00	1424.00	59.88
7/12/2018 23:32	1946.00	1430.00	59.94
7/12/2018 23:42	1945.00	1404.00	59.91
7/12/2018 23:52	1947.00	1413.00	59.97

7/24/2018 0:02	1926.00	1289.00	59.33
7/24/2018 0:12	1926.00	1289.00	59.33
7/24/2018 0:22	1926.00	1289.00	59.33
7/24/2018 0:32	1926.00	1289.00	59.33
7/24/2018 0:42	1926.00	1289.00	59.33
7/24/2018 0:52	1926.00	1289.00	59.33
7/24/2018 1:02	1926.00	1289.00	59.33
7/24/2018 1:12	1926.00	1289.00	59.33
7/24/2018 1:22	1926.00	1289.00	59.33
7/24/2018 1:32	1926.00	1289.00	59.33
7/24/2018 1:42	1926.00	1289.00	59.33
7/24/2018 1:52	1926.00	1289.00	59.33
7/24/2018 2:02	1926.00	1289.00	59.33
7/24/2018 2:12	1926.00	1289.00	59.33
7/24/2018 2:22	1926.00	1289.00	59.33
7/24/2018 2:32	1926.00	1289.00	59.33
7/24/2018 2:42	1926.00	1289.00	59.33
7/24/2018 2:52	1926.00	1289.00	59.33
7/24/2018 3:02	1926.00	1289.00	59.33
7/24/2018 3:12	1926.00	1289.00	59.33
7/24/2018 3:22	1926.00	1289.00	59.33
7/24/2018 3:32	1926.00	1289.00	59.33
7/24/2018 3:42	1926.00	1289.00	59.33
7/24/2018 3:52	1926.00	1289.00	59.33
7/24/2018 4:02	1926.00	1289.00	59.33
7/24/2018 4:12	1926.00	1289.00	59.33
7/24/2018 4:22	1926.00	1289.00	59.33
7/24/2018 4:32	1926.00	1289.00	59.33
7/24/2018 4:42	1926.00	1289.00	59.33
7/24/2018 4:52	1926.00	1289.00	59.33
7/24/2018 5:02	1926.00	1289.00	59.33
7/24/2018 5:12	1926.00	1289.00	59.33
7/24/2018 5:22	1926.00	1289.00	59.33
7/24/2018 5:32	1926.00	1289.00	59.33

Blue Ridge Landfill

S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPC IAir Account NO: FG-0536-E

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Attachment Page	Velocity (ft/sec)	4 24
7/24/2018 5:42	1926.00	1289.00	2	59.33	
7/24/2018 5:52	1926.00	1289.00		59.33	
7/24/2018 6:02	1926.00	1289.00		59.33	
7/24/2018 6:12	1926.00	1289.00		59.33	
7/24/2018 6:22	1926.00	1289.00		59.33	
7/24/2018 6:32	1926.00	1289.00		59.33	
7/24/2018 6:42	1926.00	1289.00		59.33	
7/24/2018 6:52	1926.00	1289.00		59.33	
7/24/2018 7:02	1926.00	1289.00		59.33	
7/24/2018 7:12	1926.00	1289.00		59.33	
7/24/2018 7:22	1926.00	1289.00		59.33	
7/24/2018 7:32	1926.00	1289.00		59.33	
7/24/2018 7:42	1926.00	1289.00		59.33	
7/24/2018 7:52	1926.00	1289.00		59.33	
7/24/2018 8:02	1926.00	1289.00		59.33	
7/24/2018 8:12	1926.00	1289.00		59.33	
7/24/2018 8:22	1926.00	1289.00		59.33	
7/24/2018 8:32	1926.00	1289.00		59.33	
7/24/2018 8:42	1926.00	1289.00		59.33	
7/24/2018 8:52	1926.00	1289.00		59.33	
7/24/2018 9:02	1926.00	1289.00		59.33	
7/24/2018 9:12	1926.00	1289.00		59.33	
7/24/2018 9:22	1926.00	1289.00		59.33	
7/24/2018 9:32	1926.00	1289.00		59.33	
7/24/2018 9:42	1926.00	1289.00		59.33	
7/24/2018 9:52	1926.00	1289.00		59.33	
7/24/2018 10:02	1926.00	1289.00		59.33	
7/24/2018 10:12	1926.00	1289.00		59.33	
7/24/2018 10:22	1926.00	1289.00		59.33	
7/24/2018 10:32	1926.00	1289.00		59.33	
7/24/2018 10:42	1926.00	1289.00		59.33	
7/24/2018 10:52	1926.00	1289.00		59.33	
7/24/2018 11:02	1926.00	1289.00		59.33	
7/24/2018 11:12	1926.00	1289.00		59.33	
7/24/2018 11:22	1926.00	1289.00		59.33	
7/24/2018 11:32	1926.00	1289.00		59.33	
7/24/2018 11:42	1926.00	1289.00		59.33	
7/24/2018 11:52	1926.00	1289.00		59.33	
7/24/2018 12:02	1926.00	1289.00		59.33	
7/24/2018 12:12	1926.00	1289.00		59.33	
7/24/2018 12:22	1926.00	1289.00		59.33	
7/24/2018 12:32	1926.00	1289.00		59.33	
7/24/2018 12:42	1926.00	1289.00		59.33	

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPC I
Air Account NO: PG-0536-E

Attachment: 4
Page 3 of 24
Velocity (ft/sec)

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/24/2018 12:52	1926.00	1289.00	59.33
7/24/2018 13:02	1926.00	1289.00	59.33
7/24/2018 13:12	1926.00	1289.00	59.33
7/24/2018 13:22	1926.00	1289.00	59.33
7/24/2018 13:32	1926.00	1289.00	59.33
7/24/2018 13:42	1926.00	1289.00	59.33
7/24/2018 13:52	1926.00	1289.00	59.33
7/24/2018 14:02	1926.00	1289.00	59.33
7/24/2018 14:12	1926.00	1289.00	59.33
7/24/2018 14:22	1926.00	1289.00	59.33
7/24/2018 14:32	1926.00	1289.00	59.33
7/24/2018 14:42	1926.00	1289.00	59.33
7/24/2018 14:52	1926.00	1289.00	59.33
7/24/2018 15:02	1926.00	1289.00	59.33
7/24/2018 15:12	1926.00	1289.00	59.33
7/24/2018 15:22	1926.00	1289.00	59.33
7/24/2018 15:32	1926.00	1289.00	59.33
7/24/2018 15:42	1926.00	1289.00	59.33
7/24/2018 15:52	1926.00	1289.00	59.33
7/24/2018 16:02	1926.00	1289.00	59.33
7/24/2018 16:12	1926.00	1289.00	59.33
7/24/2018 16:22	1926.00	1289.00	59.33
7/24/2018 16:32	1926.00	1289.00	59.33
7/24/2018 16:42	1926.00	1289.00	59.33
7/24/2018 16:52	1926.00	1289.00	59.33
7/24/2018 17:02	1926.00	1289.00	59.33
7/24/2018 17:12	1926.00	1289.00	59.33
7/24/2018 17:22	1926.00	1289.00	59.33
7/24/2018 17:32	1926.00	1289.00	59.33
7/24/2018 17:42	1926.00	1289.00	59.33
7/24/2018 17:52	1926.00	1289.00	59.33
7/24/2018 18:02	1926.00	1289.00	59.33
7/24/2018 18:12	1926.00	1289.00	59.33
7/24/2018 18:22	1926.00	1289.00	59.33
7/24/2018 18:32	1926.00	1289.00	59.33
7/24/2018 18:42	1926.00	1289.00	59.33
7/24/2018 18:52	1926.00	1289.00	59.33
7/24/2018 19:02	1926.00	1289.00	59.33
7/24/2018 19:12	1926.00	1289.00	59.33
7/24/2018 19:22	1926.00	1289.00	59.33
7/24/2018 19:32	1926.00	1289.00	59.33
7/24/2018 19:42	1926.00	1289.00	59.33
7/24/2018 19:52	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 4

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/24/2018 20:02	1926.00	1289.00	59.33
7/24/2018 20:12	1926.00	1289.00	59.33
7/24/2018 20:22	1926.00	1289.00	59.33
7/24/2018 20:32	1926.00	1289.00	59.33
7/24/2018 20:42	1926.00	1289.00	59.33
7/24/2018 20:52	1926.00	1289.00	59.33
7/24/2018 21:02	1926.00	1289.00	59.33
7/24/2018 21:12	1926.00	1289.00	59.33
7/24/2018 21:22	1926.00	1289.00	59.33
7/24/2018 21:32	1926.00	1289.00	59.33
7/24/2018 21:42	1926.00	1289.00	59.33
7/24/2018 21:52	1926.00	1289.00	59.33
7/24/2018 22:02	1926.00	1289.00	59.33
7/24/2018 22:12	1926.00	1289.00	59.33
7/24/2018 22:22	1926.00	1289.00	59.33
7/24/2018 22:32	1926.00	1289.00	59.33
7/24/2018 22:42	1926.00	1289.00	59.33
7/24/2018 22:52	1926.00	1289.00	59.33
7/24/2018 23:02	1926.00	1289.00	59.33
7/24/2018 23:12	1926.00	1289.00	59.33
7/24/2018 23:22	1926.00	1289.00	59.33
7/24/2018 23:32	1926.00	1289.00	59.33
7/24/2018 23:42	1926.00	1289.00	59.33
7/24/2018 23:52	1926.00	1289.00	59.33
7/25/2018 0:02	1926.00	1289.00	59.33
7/25/2018 0:12	1926.00	1289.00	59.33
7/25/2018 0:22	1926.00	1289.00	59.33
7/25/2018 0:32	1926.00	1289.00	59.33
7/25/2018 0:42	1926.00	1289.00	59.33
7/25/2018 0:52	1926.00	1289.00	59.33
7/25/2018 1:02	1926.00	1289.00	59.33
7/25/2018 1:12	1926.00	1289.00	59.33
7/25/2018 1:22	1926.00	1289.00	59.33
7/25/2018 1:32	1926.00	1289.00	59.33
7/25/2018 1:42	1926.00	1289.00	59.33
7/25/2018 1:52	1926.00	1289.00	59.33
7/25/2018 2:02	1926.00	1289.00	59.33
7/25/2018 2:12	1926.00	1289.00	59.33
7/25/2018 2:22	1926.00	1289.00	59.33
7/25/2018 2:32	1926.00	1289.00	59.33
7/25/2018 2:42	1926.00	1289.00	59.33
7/25/2018 2:52	1926.00	1289.00	59.33
7/25/2018 3:02	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPC I
Air Account NO: PG-0536-E

Attachment: 4
Page 5
Velocity (ft/sec): 24

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/25/2018 3:12	1926.00	1289.00	59.33
7/25/2018 3:22	1926.00	1289.00	59.33
7/25/2018 3:32	1926.00	1289.00	59.33
7/25/2018 3:42	1926.00	1289.00	59.33
7/25/2018 3:52	1926.00	1289.00	59.33
7/25/2018 4:02	1926.00	1289.00	59.33
7/25/2018 4:12	1926.00	1289.00	59.33
7/25/2018 4:22	1926.00	1289.00	59.33
7/25/2018 4:32	1926.00	1289.00	59.33
7/25/2018 4:42	1926.00	1289.00	59.33
7/25/2018 4:52	1926.00	1289.00	59.33
7/25/2018 5:02	1926.00	1289.00	59.33
7/25/2018 5:12	1926.00	1289.00	59.33
7/25/2018 5:22	1926.00	1289.00	59.33
7/25/2018 5:32	1926.00	1289.00	59.33
7/25/2018 5:42	1926.00	1289.00	59.33
7/25/2018 5:52	1926.00	1289.00	59.33
7/25/2018 6:02	1926.00	1289.00	59.33
7/25/2018 6:12	1926.00	1289.00	59.33
7/25/2018 6:22	1926.00	1289.00	59.33
7/25/2018 6:32	1926.00	1289.00	59.33
7/25/2018 6:42	1926.00	1289.00	59.33
7/25/2018 6:52	1926.00	1289.00	59.33
7/25/2018 7:02	1926.00	1289.00	59.33
7/25/2018 7:12	1926.00	1289.00	59.33
7/25/2018 7:22	1926.00	1289.00	59.33
7/25/2018 7:32	1926.00	1289.00	59.33
7/25/2018 7:42	1926.00	1289.00	59.33
7/25/2018 7:52	1926.00	1289.00	59.33
7/25/2018 8:02	1926.00	1289.00	59.33
7/25/2018 8:12	1926.00	1289.00	59.33
7/25/2018 8:22	1926.00	1289.00	59.33
7/25/2018 8:32	1926.00	1289.00	59.33
7/25/2018 8:42	1926.00	1289.00	59.33
7/25/2018 8:52	1926.00	1289.00	59.33
7/25/2018 9:02	1926.00	1289.00	59.33
7/25/2018 9:12	1926.00	1289.00	59.33
7/25/2018 9:22	1926.00	1289.00	59.33
7/25/2018 9:32	1926.00	1289.00	59.33
7/25/2018 9:42	1926.00	1289.00	59.33
7/25/2018 9:52	1926.00	1289.00	59.33
7/25/2018 10:02	1926.00	1289.00	59.33
7/25/2018 10:12	1926.00	1289.00	59.33

Blue Ridge Landfill

S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPC IAir Account NO: P6-0536-EAttachment: 4Page: 6

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/25/2018 10:22	1926.00	1289.00	59.33
7/25/2018 10:32	1926.00	1289.00	59.33
7/25/2018 10:42	1926.00	1289.00	59.33
7/25/2018 10:52	1926.00	1289.00	59.33
7/25/2018 11:02	1926.00	1289.00	59.33
7/25/2018 11:12	1926.00	1289.00	59.33
7/25/2018 11:22	1926.00	1289.00	59.33
7/25/2018 11:32	1926.00	1289.00	59.33
7/25/2018 11:42	1926.00	1289.00	59.33
7/25/2018 11:52	1926.00	1289.00	59.33
7/25/2018 12:02	1926.00	1289.00	59.33
7/25/2018 12:12	1926.00	1289.00	59.33
7/25/2018 12:22	1926.00	1289.00	59.33
7/25/2018 12:32	1926.00	1289.00	59.33
7/25/2018 12:42	1926.00	1289.00	59.33
7/25/2018 12:52	1926.00	1289.00	59.33
7/25/2018 13:02	1926.00	1289.00	59.33
7/25/2018 13:12	1926.00	1289.00	59.33
7/25/2018 13:22	1926.00	1289.00	59.33
7/25/2018 13:32	1926.00	1289.00	59.33
7/25/2018 13:42	1926.00	1289.00	59.33
7/25/2018 13:52	1926.00	1289.00	59.33
7/25/2018 14:02	1926.00	1289.00	59.33
7/25/2018 14:12	1926.00	1289.00	59.33
7/25/2018 14:22	1926.00	1289.00	59.33
7/25/2018 14:32	1926.00	1289.00	59.33
7/25/2018 14:42	1926.00	1289.00	59.33
7/25/2018 14:52	1926.00	1289.00	59.33
7/25/2018 15:02	1926.00	1289.00	59.33
7/25/2018 15:12	1926.00	1289.00	59.33
7/25/2018 15:22	1926.00	1289.00	59.33
7/25/2018 15:32	1926.00	1289.00	59.33
7/25/2018 15:42	1926.00	1289.00	59.33
7/25/2018 15:52	1926.00	1289.00	59.33
7/25/2018 16:02	1926.00	1289.00	59.33
7/25/2018 16:12	1926.00	1289.00	59.33
7/25/2018 16:22	1926.00	1289.00	59.33
7/25/2018 16:32	1926.00	1289.00	59.33
7/25/2018 16:42	1926.00	1289.00	59.33
7/25/2018 16:52	1926.00	1289.00	59.33
7/25/2018 17:02	1926.00	1289.00	59.33
7/25/2018 17:12	1926.00	1289.00	59.33
7/25/2018 17:22	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 4
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/25/2018 17:32	1926.00	1289.00	59.33
7/25/2018 17:42	1926.00	1289.00	59.33
7/25/2018 17:52	1926.00	1289.00	59.33
7/25/2018 18:02	1926.00	1289.00	59.33
7/25/2018 18:12	1926.00	1289.00	59.33
7/25/2018 18:22	1926.00	1289.00	59.33
7/25/2018 18:32	1926.00	1289.00	59.33
7/25/2018 18:42	1926.00	1289.00	59.33
7/25/2018 18:52	1926.00	1289.00	59.33
7/25/2018 19:02	1926.00	1289.00	59.33
7/25/2018 19:12	1926.00	1289.00	59.33
7/25/2018 19:22	1926.00	1289.00	59.33
7/25/2018 19:32	1926.00	1289.00	59.33
7/25/2018 19:42	1926.00	1289.00	59.33
7/25/2018 19:52	1926.00	1289.00	59.33
7/25/2018 20:02	1926.00	1289.00	59.33
7/25/2018 20:12	1926.00	1289.00	59.33
7/25/2018 20:22	1926.00	1289.00	59.33
7/25/2018 20:32	1926.00	1289.00	59.33
7/25/2018 20:42	1926.00	1289.00	59.33
7/25/2018 20:52	1926.00	1289.00	59.33
7/25/2018 21:02	1926.00	1289.00	59.33
7/25/2018 21:12	1926.00	1289.00	59.33
7/25/2018 21:22	1926.00	1289.00	59.33
7/25/2018 21:32	1926.00	1289.00	59.33
7/25/2018 21:42	1926.00	1289.00	59.33
7/25/2018 21:52	1926.00	1289.00	59.33
7/25/2018 22:02	1926.00	1289.00	59.33
7/25/2018 22:12	1926.00	1289.00	59.33
7/25/2018 22:22	1926.00	1289.00	59.33
7/25/2018 22:32	1926.00	1289.00	59.33
7/25/2018 22:42	1926.00	1289.00	59.33
7/25/2018 22:52	1926.00	1289.00	59.33
7/25/2018 23:02	1926.00	1289.00	59.33
7/25/2018 23:12	1926.00	1289.00	59.33
7/25/2018 23:22	1926.00	1289.00	59.33
7/25/2018 23:32	1926.00	1289.00	59.33
7/25/2018 23:42	1926.00	1289.00	59.33
7/25/2018 23:52	1926.00	1289.00	59.33
7/26/2018 0:02	1926.00	1289.00	59.33
7/26/2018 0:12	1926.00	1289.00	59.33
7/26/2018 0:22	1926.00	1289.00	59.33
7/26/2018 0:32	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: FG-0536-E

Attachment: 4
Page: 8
Velocity: 24
(ft/sec)

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/26/2018 0:42	1926.00	1289.00	59.33
7/26/2018 0:52	1926.00	1289.00	59.33
7/26/2018 1:02	1926.00	1289.00	59.33
7/26/2018 1:12	1926.00	1289.00	59.33
7/26/2018 1:22	1926.00	1289.00	59.33
7/26/2018 1:32	1926.00	1289.00	59.33
7/26/2018 1:42	1926.00	1289.00	59.33
7/26/2018 1:52	1926.00	1289.00	59.33
7/26/2018 2:02	1926.00	1289.00	59.33
7/26/2018 2:12	1926.00	1289.00	59.33
7/26/2018 2:22	1926.00	1289.00	59.33
7/26/2018 2:32	1926.00	1289.00	59.33
7/26/2018 2:42	1926.00	1289.00	59.33
7/26/2018 2:52	1926.00	1289.00	59.33
7/26/2018 3:02	1926.00	1289.00	59.33
7/26/2018 3:12	1926.00	1289.00	59.33
7/26/2018 3:22	1926.00	1289.00	59.33
7/26/2018 3:32	1926.00	1289.00	59.33
7/26/2018 3:42	1926.00	1289.00	59.33
7/26/2018 3:52	1926.00	1289.00	59.33
7/26/2018 4:02	1926.00	1289.00	59.33
7/26/2018 4:12	1926.00	1289.00	59.33
7/26/2018 4:22	1926.00	1289.00	59.33
7/26/2018 4:32	1926.00	1289.00	59.33
7/26/2018 4:42	1926.00	1289.00	59.33
7/26/2018 4:52	1926.00	1289.00	59.33
7/26/2018 5:02	1926.00	1289.00	59.33
7/26/2018 5:12	1926.00	1289.00	59.33
7/26/2018 5:22	1926.00	1289.00	59.33
7/26/2018 5:32	1926.00	1289.00	59.33
7/26/2018 5:42	1926.00	1289.00	59.33
7/26/2018 5:52	1926.00	1289.00	59.33
7/26/2018 6:02	1926.00	1289.00	59.33
7/26/2018 6:12	1926.00	1289.00	59.33
7/26/2018 6:22	1926.00	1289.00	59.33
7/26/2018 6:32	1926.00	1289.00	59.33
7/26/2018 6:42	1926.00	1289.00	59.33
7/26/2018 6:52	1926.00	1289.00	59.33
7/26/2018 7:02	1926.00	1289.00	59.33
7/26/2018 7:12	1926.00	1289.00	59.33
7/26/2018 7:22	1926.00	1289.00	59.33
7/26/2018 7:32	1926.00	1289.00	59.33
7/26/2018 7:42	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 4
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/26/2018 7:52	1926.00	1289.00	59.33
7/26/2018 8:02	1926.00	1289.00	59.33
7/26/2018 8:12	1926.00	1289.00	59.33
7/26/2018 8:22	1926.00	1289.00	59.33
7/26/2018 8:32	1926.00	1289.00	59.33
7/26/2018 8:42	1926.00	1289.00	59.33
7/26/2018 8:52	1926.00	1289.00	59.33
7/26/2018 9:02	1926.00	1289.00	59.33
7/26/2018 9:12	1926.00	1289.00	59.33
7/26/2018 9:22	1926.00	1289.00	59.33
7/26/2018 9:32	1926.00	1289.00	59.33
7/26/2018 9:42	1926.00	1289.00	59.33
7/26/2018 9:52	1926.00	1289.00	59.33
7/26/2018 10:02	1926.00	1289.00	59.33
7/26/2018 10:12	1926.00	1289.00	59.33
7/26/2018 10:22	1926.00	1289.00	59.33
7/26/2018 10:32	1926.00	1289.00	59.33
7/26/2018 10:42	1926.00	1289.00	59.33
7/26/2018 10:52	1926.00	1289.00	59.33
7/26/2018 11:02	1926.00	1289.00	59.33
7/26/2018 11:12	1926.00	1289.00	59.33
7/26/2018 11:22	1926.00	1289.00	59.33
7/26/2018 11:32	1926.00	1289.00	59.33
7/26/2018 11:42	1926.00	1289.00	59.33
7/26/2018 11:52	1926.00	1289.00	59.33
7/26/2018 12:02	1926.00	1289.00	59.33
7/26/2018 12:12	1926.00	1289.00	59.33
7/26/2018 12:22	1926.00	1289.00	59.33
7/26/2018 12:32	1926.00	1289.00	59.33
7/26/2018 12:42	1926.00	1289.00	59.33
7/26/2018 12:52	1926.00	1289.00	59.33
7/26/2018 13:02	1926.00	1289.00	59.33
7/26/2018 13:12	1926.00	1289.00	59.33
7/26/2018 13:22	1926.00	1289.00	59.33
7/26/2018 13:32	1926.00	1289.00	59.33
7/26/2018 13:42	1926.00	1289.00	59.33
7/26/2018 13:52	1926.00	1289.00	59.33
7/26/2018 14:02	1926.00	1289.00	59.33
7/26/2018 14:12	1926.00	1289.00	59.33
7/26/2018 14:22	1926.00	1289.00	59.33
7/26/2018 14:32	1926.00	1289.00	59.33
7/26/2018 14:42	1926.00	1289.00	59.33
7/26/2018 14:52	1926.00	1289.00	59.33

Blue Ridge Landfill

S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCIAir Account NO: FG-0530-EAttachment: 4

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/26/2018 15:02	1926.00	1289.00	59.33
7/26/2018 15:12	1926.00	1289.00	59.33
7/26/2018 15:22	1926.00	1289.00	59.33
7/26/2018 15:32	1926.00	1289.00	59.33
7/26/2018 15:42	1926.00	1289.00	59.33
7/26/2018 15:52	1926.00	1289.00	59.33
7/26/2018 16:02	1926.00	1289.00	59.33
7/26/2018 16:12	1926.00	1289.00	59.33
7/26/2018 16:22	1926.00	1289.00	59.33
7/26/2018 16:32	1926.00	1289.00	59.33
7/26/2018 16:42	1926.00	1289.00	59.33
7/26/2018 16:52	1926.00	1289.00	59.33
7/26/2018 17:02	1926.00	1289.00	59.33
7/26/2018 17:12	1926.00	1289.00	59.33
7/26/2018 17:22	1926.00	1289.00	59.33
7/26/2018 17:32	1926.00	1289.00	59.33
7/26/2018 17:42	1926.00	1289.00	59.33
7/26/2018 17:52	1926.00	1289.00	59.33
7/26/2018 18:02	1926.00	1289.00	59.33
7/26/2018 18:12	1926.00	1289.00	59.33
7/26/2018 18:22	1926.00	1289.00	59.33
7/26/2018 18:32	1926.00	1289.00	59.33
7/26/2018 18:42	1926.00	1289.00	59.33
7/26/2018 18:52	1926.00	1289.00	59.33
7/26/2018 19:02	1926.00	1289.00	59.33
7/26/2018 19:12	1926.00	1289.00	59.33
7/26/2018 19:22	1926.00	1289.00	59.33
7/26/2018 19:32	1926.00	1289.00	59.33
7/26/2018 19:42	1926.00	1289.00	59.33
7/26/2018 19:52	1926.00	1289.00	59.33
7/26/2018 20:02	1926.00	1289.00	59.33
7/26/2018 20:12	1926.00	1289.00	59.33
7/26/2018 20:22	1926.00	1289.00	59.33
7/26/2018 20:32	1926.00	1289.00	59.33
7/26/2018 20:42	1926.00	1289.00	59.33
7/26/2018 20:52	1926.00	1289.00	59.33
7/26/2018 21:02	1926.00	1289.00	59.33
7/26/2018 21:12	1926.00	1289.00	59.33
7/26/2018 21:22	1926.00	1289.00	59.33
7/26/2018 21:32	1926.00	1289.00	59.33
7/26/2018 21:42	1926.00	1289.00	59.33
7/26/2018 21:52	1926.00	1289.00	59.33
7/26/2018 22:02	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 4

Date & Time	Gas Flow (SCFM)	Flame Temp (°F)	Velocity (ft/sec)
7/26/2018 22:12	1926.00	1289.00	59.33
7/26/2018 22:22	1926.00	1289.00	59.33
7/26/2018 22:32	1926.00	1289.00	59.33
7/26/2018 22:42	1926.00	1289.00	59.33
7/26/2018 22:52	1926.00	1289.00	59.33
7/26/2018 23:02	1926.00	1289.00	59.33
7/26/2018 23:12	1926.00	1289.00	59.33
7/26/2018 23:22	1926.00	1289.00	59.33
7/26/2018 23:32	1926.00	1289.00	59.33
7/26/2018 23:42	1926.00	1289.00	59.33
7/26/2018 23:52	1926.00	1289.00	59.33
7/27/2018 0:02	1926.00	1289.00	59.33
7/27/2018 0:12	1926.00	1289.00	59.33
7/27/2018 0:22	1926.00	1289.00	59.33
7/27/2018 0:32	1926.00	1289.00	59.33
7/27/2018 0:42	1926.00	1289.00	59.33
7/27/2018 0:52	1926.00	1289.00	59.33
7/27/2018 1:02	1926.00	1289.00	59.33
7/27/2018 1:12	1926.00	1289.00	59.33
7/27/2018 1:22	1926.00	1289.00	59.33
7/27/2018 1:32	1926.00	1289.00	59.33
7/27/2018 1:42	1926.00	1289.00	59.33
7/27/2018 1:52	1926.00	1289.00	59.33
7/27/2018 2:02	1926.00	1289.00	59.33
7/27/2018 2:12	1926.00	1289.00	59.33
7/27/2018 2:22	1926.00	1289.00	59.33
7/27/2018 2:32	1926.00	1289.00	59.33
7/27/2018 2:42	1926.00	1289.00	59.33
7/27/2018 2:52	1926.00	1289.00	59.33
7/27/2018 3:02	1926.00	1289.00	59.33
7/27/2018 3:12	1926.00	1289.00	59.33
7/27/2018 3:22	1926.00	1289.00	59.33
7/27/2018 3:32	1926.00	1289.00	59.33
7/27/2018 3:42	1926.00	1289.00	59.33
7/27/2018 3:52	1926.00	1289.00	59.33
7/27/2018 4:02	1926.00	1289.00	59.33
7/27/2018 4:12	1926.00	1289.00	59.33
7/27/2018 4:22	1926.00	1289.00	59.33
7/27/2018 4:32	1926.00	1289.00	59.33
7/27/2018 4:42	1926.00	1289.00	59.33
7/27/2018 4:52	1926.00	1289.00	59.33
7/27/2018 5:02	1926.00	1289.00	59.33
7/27/2018 5:12	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFI ARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 4

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Page 2 Velocity (ft/sec)	of 24
7/27/2018 5:22	1926.00	1289.00	59.33	
7/27/2018 5:32	1926.00	1289.00	59.33	
7/27/2018 5:42	1926.00	1289.00	59.33	
7/27/2018 5:52	1926.00	1289.00	59.33	
7/27/2018 6:02	1926.00	1289.00	59.33	
7/27/2018 6:12	1926.00	1289.00	59.33	
7/27/2018 6:22	1926.00	1289.00	59.33	
7/27/2018 6:32	1926.00	1289.00	59.33	
7/27/2018 6:42	1926.00	1289.00	59.33	
7/27/2018 6:52	1926.00	1289.00	59.33	
7/27/2018 7:02	1926.00	1289.00	59.33	
7/27/2018 7:12	1926.00	1289.00	59.33	
7/27/2018 7:22	1926.00	1289.00	59.33	
7/27/2018 7:32	1926.00	1289.00	59.33	
7/27/2018 7:42	1926.00	1289.00	59.33	
7/27/2018 7:52	1926.00	1289.00	59.33	
7/27/2018 8:02	1926.00	1289.00	59.33	
7/27/2018 8:12	1926.00	1289.00	59.33	
7/27/2018 8:22	1926.00	1289.00	59.33	
7/27/2018 8:32	1926.00	1289.00	59.33	
7/27/2018 8:42	1926.00	1289.00	59.33	
7/27/2018 8:52	1926.00	1289.00	59.33	
7/27/2018 9:02	1926.00	1289.00	59.33	
7/27/2018 9:12	1926.00	1289.00	59.33	
7/27/2018 9:22	1926.00	1289.00	59.33	
7/27/2018 9:32	1926.00	1289.00	59.33	
7/27/2018 9:42	1926.00	1289.00	59.33	
7/27/2018 9:52	1926.00	1289.00	59.33	
7/27/2018 10:02	1926.00	1289.00	59.33	
7/27/2018 10:12	1926.00	1289.00	59.33	
7/27/2018 10:22	1926.00	1289.00	59.33	
7/27/2018 10:32	1926.00	1289.00	59.33	
7/27/2018 10:42	1926.00	1289.00	59.33	
7/27/2018 10:52	1926.00	1289.00	59.33	
7/27/2018 11:02	1926.00	1289.00	59.33	
7/27/2018 11:12	1926.00	1289.00	59.33	
7/27/2018 11:22	1926.00	1289.00	59.33	
7/27/2018 11:32	1926.00	1289.00	59.33	
7/27/2018 11:42	1926.00	1289.00	59.33	
7/27/2018 11:52	1926.00	1289.00	59.33	
7/27/2018 12:02	1926.00	1289.00	59.33	
7/27/2018 12:12	1926.00	1289.00	59.33	
7/27/2018 12:22	1926.00	1289.00	59.33	

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: PG-0536-E
Attachment: 4

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/27/2018 12:32	1926.00	1289.00	59.33
7/27/2018 12:42	1926.00	1289.00	59.33
7/27/2018 12:52	1926.00	1289.00	59.33
7/27/2018 13:02	1926.00	1289.00	59.33
7/27/2018 13:12	1926.00	1289.00	59.33
7/27/2018 13:22	1926.00	1289.00	59.33
7/27/2018 13:32	1926.00	1289.00	59.33
7/27/2018 13:42	1926.00	1289.00	59.33
7/27/2018 13:52	1926.00	1289.00	59.33
7/27/2018 14:02	1926.00	1289.00	59.33
7/27/2018 14:12	1926.00	1289.00	59.33
7/27/2018 14:22	1926.00	1289.00	59.33
7/27/2018 14:32	1926.00	1289.00	59.33
7/27/2018 14:42	1926.00	1289.00	59.33
7/27/2018 14:52	1926.00	1289.00	59.33
7/27/2018 15:02	1926.00	1289.00	59.33
7/27/2018 15:12	1926.00	1289.00	59.33
7/27/2018 15:22	1926.00	1289.00	59.33
7/27/2018 15:32	1926.00	1289.00	59.33
7/27/2018 15:42	1926.00	1289.00	59.33
7/27/2018 15:52	1926.00	1289.00	59.33
7/27/2018 16:02	1926.00	1289.00	59.33
7/27/2018 16:12	1926.00	1289.00	59.33
7/27/2018 16:22	1926.00	1289.00	59.33
7/27/2018 16:32	1926.00	1289.00	59.33
7/27/2018 16:42	1926.00	1289.00	59.33
7/27/2018 16:52	1926.00	1289.00	59.33
7/27/2018 17:02	1926.00	1289.00	59.33
7/27/2018 17:12	1926.00	1289.00	59.33
7/27/2018 17:22	1926.00	1289.00	59.33
7/27/2018 17:32	1926.00	1289.00	59.33
7/27/2018 17:42	1926.00	1289.00	59.33
7/27/2018 17:52	1926.00	1289.00	59.33
7/27/2018 18:02	1926.00	1289.00	59.33
7/27/2018 18:12	1926.00	1289.00	59.33
7/27/2018 18:22	1926.00	1289.00	59.33
7/27/2018 18:32	1926.00	1289.00	59.33
7/27/2018 18:42	1926.00	1289.00	59.33
7/27/2018 18:52	1926.00	1289.00	59.33
7/27/2018 19:02	1926.00	1289.00	59.33
7/27/2018 19:12	1926.00	1289.00	59.33
7/27/2018 19:22	1926.00	1289.00	59.33
7/27/2018 19:32	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCT
Air Account NO: FG-0536-E
Attachment: 4

Page 14 of 24

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/27/2018 19:42	1926.00	1289.00	59.33
7/27/2018 19:52	1926.00	1289.00	59.33
7/27/2018 20:02	1926.00	1289.00	59.33
7/27/2018 20:12	1926.00	1289.00	59.33
7/27/2018 20:22	1926.00	1289.00	59.33
7/27/2018 20:32	1926.00	1289.00	59.33
7/27/2018 20:42	1926.00	1289.00	59.33
7/27/2018 20:52	1926.00	1289.00	59.33
7/27/2018 21:02	1926.00	1289.00	59.33
7/27/2018 21:12	1926.00	1289.00	59.33
7/27/2018 21:22	1926.00	1289.00	59.33
7/27/2018 21:32	1926.00	1289.00	59.33
7/27/2018 21:42	1926.00	1289.00	59.33
7/27/2018 21:52	1926.00	1289.00	59.33
7/27/2018 22:02	1926.00	1289.00	59.33
7/27/2018 22:12	1926.00	1289.00	59.33
7/27/2018 22:22	1926.00	1289.00	59.33
7/27/2018 22:32	1926.00	1289.00	59.33
7/27/2018 22:42	1926.00	1289.00	59.33
7/27/2018 22:52	1926.00	1289.00	59.33
7/27/2018 23:02	1926.00	1289.00	59.33
7/27/2018 23:12	1926.00	1289.00	59.33
7/27/2018 23:22	1926.00	1289.00	59.33
7/27/2018 23:32	1926.00	1289.00	59.33
7/27/2018 23:42	1926.00	1289.00	59.33
7/27/2018 23:52	1926.00	1289.00	59.33

7/30/2018 0:02	1926.00	1289.00	59.33
7/30/2018 0:12	1926.00	1289.00	59.33
7/30/2018 0:22	1926.00	1289.00	59.33
7/30/2018 0:32	1926.00	1289.00	59.33
7/30/2018 0:42	1926.00	1289.00	59.33
7/30/2018 0:52	1926.00	1289.00	59.33
7/30/2018 1:02	1926.00	1289.00	59.33
7/30/2018 1:12	1926.00	1289.00	59.33
7/30/2018 1:22	1926.00	1289.00	59.33
7/30/2018 1:32	1926.00	1289.00	59.33
7/30/2018 1:42	1926.00	1289.00	59.33
7/30/2018 1:52	1926.00	1289.00	59.33
7/30/2018 2:02	1926.00	1289.00	59.33
7/30/2018 2:12	1926.00	1289.00	59.33
7/30/2018 2:22	1926.00	1289.00	59.33
7/30/2018 2:32	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: DG-0536-E
Attachment: 4
Page 15 Velocity 24
(ft/sec)

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/30/2018 2:42	1926.00	1289.00	59.33
7/30/2018 2:52	1926.00	1289.00	59.33
7/30/2018 3:02	1926.00	1289.00	59.33
7/30/2018 3:12	1926.00	1289.00	59.33
7/30/2018 3:22	1926.00	1289.00	59.33
7/30/2018 3:32	1926.00	1289.00	59.33
7/30/2018 3:42	1926.00	1289.00	59.33
7/30/2018 3:52	1926.00	1289.00	59.33
7/30/2018 4:02	1926.00	1289.00	59.33
7/30/2018 4:12	1926.00	1289.00	59.33
7/30/2018 4:22	1926.00	1289.00	59.33
7/30/2018 4:32	1926.00	1289.00	59.33
7/30/2018 4:42	1926.00	1289.00	59.33
7/30/2018 4:52	1926.00	1289.00	59.33
7/30/2018 5:02	1926.00	1289.00	59.33
7/30/2018 5:12	1926.00	1289.00	59.33
7/30/2018 5:22	1926.00	1289.00	59.33
7/30/2018 5:32	1926.00	1289.00	59.33
7/30/2018 5:42	1926.00	1289.00	59.33
7/30/2018 5:52	1926.00	1289.00	59.33
7/30/2018 6:02	1926.00	1289.00	59.33
7/30/2018 6:12	1926.00	1289.00	59.33
7/30/2018 6:22	1926.00	1289.00	59.33
7/30/2018 6:32	1926.00	1289.00	59.33
7/30/2018 6:42	1926.00	1289.00	59.33
7/30/2018 6:52	1926.00	1289.00	59.33
7/30/2018 7:02	1926.00	1289.00	59.33
7/30/2018 7:12	1926.00	1289.00	59.33
7/30/2018 7:22	1926.00	1289.00	59.33
7/30/2018 7:32	1926.00	1289.00	59.33
7/30/2018 7:42	1926.00	1289.00	59.33
7/30/2018 7:52	1926.00	1289.00	59.33
7/30/2018 8:02	1926.00	1289.00	59.33
7/30/2018 8:12	1926.00	1289.00	59.33
7/30/2018 8:22	1926.00	1289.00	59.33
7/30/2018 8:32	1926.00	1289.00	59.33
7/30/2018 8:42	1926.00	1289.00	59.33
7/30/2018 8:52	1926.00	1289.00	59.33
7/30/2018 9:02	1926.00	1289.00	59.33
7/30/2018 9:12	1926.00	1289.00	59.33
7/30/2018 9:22	1926.00	1289.00	59.33
7/30/2018 9:32	1926.00	1289.00	59.33
7/30/2018 9:42	1926.00	1289.00	59.33

Blue Ridge Landfill

S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCTAir Account NO: FG-0536-EAttachment: 4
Page 16 of 24

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/30/2018 9:52	1926.00	1289.00	59.33
7/30/2018 10:02	1926.00	1289.00	59.33
7/30/2018 10:12	1926.00	1289.00	59.33
7/30/2018 10:22	1926.00	1289.00	59.33
7/30/2018 10:32	1926.00	1289.00	59.33
7/30/2018 10:42	1926.00	1289.00	59.33
7/30/2018 10:52	1926.00	1289.00	59.33
7/30/2018 11:02	1926.00	1289.00	59.33
7/30/2018 11:12	1926.00	1289.00	59.33
7/30/2018 11:22	1926.00	1289.00	59.33
7/30/2018 11:32	1926.00	1289.00	59.33
7/30/2018 11:42	1926.00	1289.00	59.33
7/30/2018 11:52	1926.00	1289.00	59.33
7/30/2018 12:02	1926.00	1289.00	59.33
7/30/2018 12:12	1926.00	1289.00	59.33
7/30/2018 12:22	1926.00	1289.00	59.33
7/30/2018 12:32	1926.00	1289.00	59.33
7/30/2018 12:42	1926.00	1289.00	59.33
7/30/2018 12:52	1926.00	1289.00	59.33
7/30/2018 13:02	1926.00	1289.00	59.33
7/30/2018 13:12	1926.00	1289.00	59.33
7/30/2018 13:22	1926.00	1289.00	59.33
7/30/2018 13:32	1926.00	1289.00	59.33
7/30/2018 13:42	1926.00	1289.00	59.33
7/30/2018 13:52	1926.00	1289.00	59.33
7/30/2018 14:02	1926.00	1289.00	59.33
7/30/2018 14:12	1926.00	1289.00	59.33
7/30/2018 14:22	1926.00	1289.00	59.33
7/30/2018 14:32	1926.00	1289.00	59.33
7/30/2018 14:42	1926.00	1289.00	59.33
7/30/2018 14:52	1926.00	1289.00	59.33
7/30/2018 15:02	1926.00	1289.00	59.33
7/30/2018 15:12	1926.00	1289.00	59.33
7/30/2018 15:22	1926.00	1289.00	59.33
7/30/2018 15:32	1926.00	1289.00	59.33
7/30/2018 15:42	1926.00	1289.00	59.33
7/30/2018 15:52	1926.00	1289.00	59.33
7/30/2018 16:02	1926.00	1289.00	59.33
7/30/2018 16:12	1926.00	1289.00	59.33
7/30/2018 16:22	1926.00	1289.00	59.33
7/30/2018 16:32	1926.00	1289.00	59.33
7/30/2018 16:42	1926.00	1289.00	59.33
7/30/2018 16:52	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: EG-0536-E
Attachment: 4
Page 17 of 24

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/30/2018 17:02	1926.00	1289.00	59.33
7/30/2018 17:12	1926.00	1289.00	59.33
7/30/2018 17:22	1926.00	1289.00	59.33
7/30/2018 17:32	1926.00	1289.00	59.33
7/30/2018 17:42	1926.00	1289.00	59.33
7/30/2018 17:52	1926.00	1289.00	59.33
7/30/2018 18:02	1926.00	1289.00	59.33
7/30/2018 18:12	1926.00	1289.00	59.33
7/30/2018 18:22	1926.00	1289.00	59.33
7/30/2018 18:32	1926.00	1289.00	59.33
7/30/2018 18:42	1926.00	1289.00	59.33
7/30/2018 18:52	1926.00	1289.00	59.33
7/30/2018 19:02	1926.00	1289.00	59.33
7/30/2018 19:12	1926.00	1289.00	59.33
7/30/2018 19:22	1926.00	1289.00	59.33
7/30/2018 19:32	1926.00	1289.00	59.33
7/30/2018 19:42	1926.00	1289.00	59.33
7/30/2018 19:52	1926.00	1289.00	59.33
7/30/2018 20:02	1926.00	1289.00	59.33
7/30/2018 20:12	1926.00	1289.00	59.33
7/30/2018 20:22	1926.00	1289.00	59.33
7/30/2018 20:32	1926.00	1289.00	59.33
7/30/2018 20:42	1926.00	1289.00	59.33
7/30/2018 20:52	1926.00	1289.00	59.33
7/30/2018 21:02	1926.00	1289.00	59.33
7/30/2018 21:12	1926.00	1289.00	59.33
7/30/2018 21:22	1926.00	1289.00	59.33
7/30/2018 21:32	1926.00	1289.00	59.33
7/30/2018 21:42	1926.00	1289.00	59.33
7/30/2018 21:52	1926.00	1289.00	59.33
7/30/2018 22:02	1926.00	1289.00	59.33
7/30/2018 22:12	1926.00	1289.00	59.33
7/30/2018 22:22	1926.00	1289.00	59.33
7/30/2018 22:32	1926.00	1289.00	59.33
7/30/2018 22:42	1926.00	1289.00	59.33
7/30/2018 22:52	1926.00	1289.00	59.33
7/30/2018 23:02	1926.00	1289.00	59.33
7/30/2018 23:12	1926.00	1289.00	59.33
7/30/2018 23:22	1926.00	1289.00	59.33
7/30/2018 23:32	1926.00	1289.00	59.33
7/30/2018 23:42	1926.00	1289.00	59.33
7/30/2018 23:52	1926.00	1289.00	59.33
7/31/2018 0:02	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: PG-0530-E
Attachment: 4

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Page 18 Velocity (ft/sec)
7/31/2018 0:12	1926.00	1289.00	59.33
7/31/2018 0:22	1926.00	1289.00	59.33
7/31/2018 0:32	1926.00	1289.00	59.33
7/31/2018 0:42	1926.00	1289.00	59.33
7/31/2018 0:52	1926.00	1289.00	59.33
7/31/2018 1:02	1926.00	1289.00	59.33
7/31/2018 1:12	1926.00	1289.00	59.33
7/31/2018 1:22	1926.00	1289.00	59.33
7/31/2018 1:32	1926.00	1289.00	59.33
7/31/2018 1:42	1926.00	1289.00	59.33
7/31/2018 1:52	1926.00	1289.00	59.33
7/31/2018 2:02	1926.00	1289.00	59.33
7/31/2018 2:12	1926.00	1289.00	59.33
7/31/2018 2:22	1926.00	1289.00	59.33
7/31/2018 2:32	1926.00	1289.00	59.33
7/31/2018 2:42	1926.00	1289.00	59.33
7/31/2018 2:52	1926.00	1289.00	59.33
7/31/2018 3:02	1926.00	1289.00	59.33
7/31/2018 3:12	1926.00	1289.00	59.33
7/31/2018 3:22	1926.00	1289.00	59.33
7/31/2018 3:32	1926.00	1289.00	59.33
7/31/2018 3:42	1926.00	1289.00	59.33
7/31/2018 3:52	1926.00	1289.00	59.33
7/31/2018 4:02	1926.00	1289.00	59.33
7/31/2018 4:12	1926.00	1289.00	59.33
7/31/2018 4:22	1926.00	1289.00	59.33
7/31/2018 4:32	1926.00	1289.00	59.33
7/31/2018 4:42	1926.00	1289.00	59.33
7/31/2018 4:52	1926.00	1289.00	59.33
7/31/2018 5:02	1926.00	1289.00	59.33
7/31/2018 5:12	1926.00	1289.00	59.33
7/31/2018 5:22	1926.00	1289.00	59.33
7/31/2018 5:32	1926.00	1289.00	59.33
7/31/2018 5:42	1926.00	1289.00	59.33
7/31/2018 5:52	1926.00	1289.00	59.33
7/31/2018 6:02	1926.00	1289.00	59.33
7/31/2018 6:12	1926.00	1289.00	59.33
7/31/2018 6:22	1926.00	1289.00	59.33
7/31/2018 6:32	1926.00	1289.00	59.33
7/31/2018 6:42	1926.00	1289.00	59.33
7/31/2018 6:52	1926.00	1289.00	59.33
7/31/2018 7:02	1926.00	1289.00	59.33
7/31/2018 7:12	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: PG-0536-E

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Attachment Page	Velocity (ft/sec)
7/31/2018 7:22	1926.00	1289.00	19	59.33
7/31/2018 7:32	1926.00	1289.00		59.33
7/31/2018 7:42	1926.00	1289.00		59.33
7/31/2018 7:52	1926.00	1289.00		59.33
7/31/2018 8:02	1926.00	1289.00		59.33
7/31/2018 8:12	1926.00	1289.00		59.33
7/31/2018 8:22	1926.00	1289.00		59.33
7/31/2018 8:32	1926.00	1289.00		59.33
7/31/2018 8:42	1926.00	1289.00		59.33
7/31/2018 8:52	1926.00	1289.00		59.33
7/31/2018 9:02	1926.00	1289.00		59.33
7/31/2018 9:12	1926.00	1289.00		59.33
7/31/2018 9:22	1926.00	1289.00		59.33
7/31/2018 9:32	1926.00	1289.00		59.33
7/31/2018 9:42	1926.00	1289.00		59.33
7/31/2018 9:52	1926.00	1289.00		59.33
7/31/2018 10:02	1926.00	1289.00		59.33
7/31/2018 10:12	1926.00	1289.00		59.33
7/31/2018 10:22	1926.00	1289.00		59.33
7/31/2018 10:32	1926.00	1289.00		59.33
7/31/2018 10:42	1926.00	1289.00		59.33
7/31/2018 10:52	1926.00	1289.00		59.33
7/31/2018 11:02	1926.00	1289.00		59.33
7/31/2018 11:12	1926.00	1289.00		59.33
7/31/2018 11:22	1926.00	1289.00		59.33
7/31/2018 11:32	1926.00	1289.00		59.33
7/31/2018 11:42	1926.00	1289.00		59.33
7/31/2018 11:52	1926.00	1289.00		59.33
7/31/2018 12:02	1926.00	1289.00		59.33
7/31/2018 12:12	1926.00	1289.00		59.33
7/31/2018 12:22	1926.00	1289.00		59.33
7/31/2018 12:32	1926.00	1289.00		59.33
7/31/2018 12:42	1926.00	1289.00		59.33
7/31/2018 12:52	1926.00	1289.00		59.33
7/31/2018 13:02	1926.00	1289.00		59.33
7/31/2018 13:12	1926.00	1289.00		59.33
7/31/2018 13:22	1926.00	1289.00		59.33
7/31/2018 13:32	1926.00	1289.00		59.33
7/31/2018 13:42	1926.00	1289.00		59.33
7/31/2018 13:52	1926.00	1289.00		59.33
7/31/2018 14:02	1926.00	1289.00		59.33
7/31/2018 14:12	1926.00	1289.00		59.33
7/31/2018 14:22	1926.00	1289.00		59.33

Blue Ridge Landfill

S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPTAir Account NO: FG-0536-EAttachment: 4
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
7/31/2018 14:32	1926.00	1289.00	59.33
7/31/2018 14:42	1926.00	1289.00	59.33
7/31/2018 14:52	1926.00	1289.00	59.33
7/31/2018 15:02	1926.00	1289.00	59.33
7/31/2018 15:12	1926.00	1289.00	59.33
7/31/2018 15:22	1926.00	1289.00	59.33
7/31/2018 15:32	1926.00	1289.00	59.33
7/31/2018 15:42	1926.00	1289.00	59.33
7/31/2018 15:52	1926.00	1289.00	59.33
7/31/2018 16:02	1926.00	1289.00	59.33
7/31/2018 16:12	1926.00	1289.00	59.33
7/31/2018 16:22	1926.00	1289.00	59.33
7/31/2018 16:32	1926.00	1289.00	59.33
7/31/2018 16:42	1926.00	1289.00	59.33
7/31/2018 16:52	1926.00	1289.00	59.33
7/31/2018 17:02	1926.00	1289.00	59.33
7/31/2018 17:12	1926.00	1289.00	59.33
7/31/2018 17:22	1926.00	1289.00	59.33
7/31/2018 17:32	1926.00	1289.00	59.33
7/31/2018 17:42	1926.00	1289.00	59.33
7/31/2018 17:52	1926.00	1289.00	59.33
7/31/2018 18:02	1926.00	1289.00	59.33
7/31/2018 18:12	1926.00	1289.00	59.33
7/31/2018 18:22	1926.00	1289.00	59.33
7/31/2018 18:32	1926.00	1289.00	59.33
7/31/2018 18:42	1926.00	1289.00	59.33
7/31/2018 18:52	1926.00	1289.00	59.33
7/31/2018 19:02	1926.00	1289.00	59.33
7/31/2018 19:12	1926.00	1289.00	59.33
7/31/2018 19:22	1926.00	1289.00	59.33
7/31/2018 19:32	1926.00	1289.00	59.33
7/31/2018 19:42	1926.00	1289.00	59.33
7/31/2018 19:52	1926.00	1289.00	59.33
7/31/2018 20:02	1926.00	1289.00	59.33
7/31/2018 20:12	1926.00	1289.00	59.33
7/31/2018 20:22	1926.00	1289.00	59.33
7/31/2018 20:32	1926.00	1289.00	59.33
7/31/2018 20:42	1926.00	1289.00	59.33
7/31/2018 20:52	1926.00	1289.00	59.33
7/31/2018 21:02	1926.00	1289.00	59.33
7/31/2018 21:12	1926.00	1289.00	59.33
7/31/2018 21:22	1926.00	1289.00	59.33
7/31/2018 21:32	1926.00	1289.00	59.33

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: EG-0530-E

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Attachment Page 21 (ft/sec)
7/31/2018 21:42	1926.00	1289.00	59.33
7/31/2018 21:52	1926.00	1289.00	59.33
7/31/2018 22:02	1926.00	1289.00	59.33
7/31/2018 22:12	1926.00	1289.00	59.33
7/31/2018 22:22	1926.00	1289.00	59.33
7/31/2018 22:32	1926.00	1289.00	59.33
7/31/2018 22:42	1926.00	1289.00	59.33
7/31/2018 22:52	1926.00	1289.00	59.33
7/31/2018 23:02	1926.00	1289.00	59.33
7/31/2018 23:12	1926.00	1289.00	59.33
7/31/2018 23:22	1926.00	1289.00	59.33
7/31/2018 23:32	1926.00	1289.00	59.33
7/31/2018 23:42	1926.00	1289.00	59.33
7/31/2018 23:52	1926.00	1289.00	59.33

8/20/2018 0:02	1740.00	1387.00	53.60
8/20/2018 0:12	1744.00	1385.00	53.72
8/20/2018 0:22	1746.00	1378.00	53.78
8/20/2018 0:32	1746.00	1375.00	53.78
8/20/2018 0:42	1742.00	1373.00	53.66
8/20/2018 0:52	1742.00	1387.00	53.66
8/20/2018 1:02	1735.00	1393.00	53.44
8/20/2018 1:12	1738.00	1378.00	53.54
8/20/2018 1:22	1735.00	1373.00	53.44
8/20/2018 1:32	1739.00	1388.00	53.57
8/20/2018 1:42	1747.00	1377.00	53.81
8/20/2018 1:52	1738.00	1366.00	53.54
8/20/2018 2:02	1744.00	1374.00	53.72
8/20/2018 2:12	1741.00	1371.00	53.63
8/20/2018 2:22	1746.00	1365.00	53.78
8/20/2018 2:32	1743.00	1371.00	53.69
8/20/2018 2:42	1751.00	1392.00	53.94
8/20/2018 2:52	1746.00	1392.00	53.78
8/20/2018 3:02	1744.00	1395.00	53.72
8/20/2018 3:12	1741.00	1392.00	53.63
8/20/2018 3:22	1747.00	1396.00	53.81
8/20/2018 3:32	1744.00	1365.00	53.72
8/20/2018 3:42	1747.00	1362.00	53.81
8/20/2018 3:52	1741.00	1359.00	53.63
8/20/2018 4:02	1754.00	1369.00	54.03
8/20/2018 4:12	1752.00	1387.00	53.97
8/20/2018 4:22	1746.00	1376.00	53.78
8/20/2018 4:32	1747.00	1363.00	53.81

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPI
Air Account NO: 16-0536-E
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
11/15/2018 13:36	2002.00	1367.00	61.67
11/15/2018 13:44	2006.00	1347.00	61.79
11/15/2018 13:52	2008.00	1324.00	61.85
11/15/2018 14:00	2010.00	1331.00	61.92
11/15/2018 14:08	2014.00	1307.00	62.04
11/15/2018 14:16	2017.00	1256.00	62.13
11/15/2018 14:24	2013.00	1263.00	62.01
11/15/2018 14:32	2014.00	1273.00	62.04
11/15/2018 14:40	2014.00	1312.00	62.04
11/15/2018 14:48	2015.00	1270.00	62.07
11/15/2018 14:56	2017.00	1222.00	62.13
11/15/2018 15:04	2011.00	1227.00	61.95
11/15/2018 15:12	2009.00	1263.00	61.88
11/15/2018 15:20	2010.00	1342.00	61.92
11/15/2018 15:28	2008.00	1270.00	61.85
11/15/2018 15:36	2008.00	1272.00	61.85
11/15/2018 15:44	2009.00	1333.00	61.88
11/15/2018 15:52	2009.00	1353.00	61.88
11/15/2018 16:00	2005.00	1354.00	61.76
11/15/2018 16:08	1994.00	1353.00	61.42
11/15/2018 16:16	1990.00	1333.00	61.30
11/15/2018 16:24	1990.00	1317.00	61.30
11/15/2018 16:32	1990.00	1332.00	61.30
11/15/2018 16:40	1992.00	1347.00	61.36
11/15/2018 16:48	1994.00	1323.00	61.42
11/15/2018 16:56	1994.00	1344.00	61.42
11/15/2018 17:04	2010.00	1339.00	61.92
11/15/2018 17:12	2020.00	1332.00	62.22
11/15/2018 17:20	2187.00	1339.00	67.37
11/15/2018 17:28	2366.00	1354.00	72.88
11/15/2018 17:36	2365.00	1325.00	72.85
11/15/2018 17:44	2365.00	1205.00	72.85
11/15/2018 17:52	2151.00	1230.00	66.26
11/15/2018 18:00	1952.00	1285.00	60.13
11/15/2018 18:08	1886.00	1298.00	58.10
11/15/2018 18:16	1886.00	1298.00	58.10
11/15/2018 18:24	1886.00	1298.00	58.10
11/15/2018 18:32	1886.00	1298.00	58.10
11/15/2018 18:40	1886.00	1298.00	58.10
11/15/2018 18:48	1886.00	1298.00	58.10
11/15/2018 18:56	1886.00	1298.00	58.10
11/15/2018 19:04	1886.00	1298.00	58.10
11/15/2018 19:12	1886.00	1298.00	58.10

Blue Ridge Landfill
S3UFLARE1 (Rental Utility Flare)

Investigation Type: SPCI
Air Account NO: PG-0536-E
4

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
11/15/2018 19:20	1886.00	1298.00	58.10
11/15/2018 19:28	1886.00	1298.00	58.10
11/15/2018 19:36	1886.00	1298.00	58.10
11/15/2018 19:44	1886.00	1298.00	58.10
11/15/2018 19:52	1886.00	1298.00	58.10
11/15/2018 20:00	1886.00	1298.00	58.10
11/15/2018 20:08	1886.00	1298.00	58.10
11/15/2018 20:16	1886.00	1298.00	58.10
11/15/2018 20:24	1886.00	1298.00	58.10
11/15/2018 20:32	1886.00	1298.00	58.10
11/15/2018 20:40	1886.00	1298.00	58.10
11/15/2018 20:48	1886.00	1298.00	58.10
11/15/2018 20:56	1886.00	1298.00	58.10
11/15/2018 21:04	1886.00	1298.00	58.10
11/15/2018 21:12	1886.00	1298.00	58.10
11/15/2018 21:20	1886.00	1298.00	58.10
11/15/2018 21:28	1886.00	1298.00	58.10
11/15/2018 21:36	1886.00	1298.00	58.10
11/15/2018 21:44	1886.00	1298.00	58.10
11/15/2018 21:52	1886.00	1298.00	58.10
11/15/2018 22:00	1886.00	1298.00	58.10
11/15/2018 22:08	1886.00	1298.00	58.10
11/15/2018 22:16	1886.00	1298.00	58.10
11/15/2018 22:24	1886.00	1298.00	58.10
11/15/2018 22:32	1886.00	1298.00	58.10
11/15/2018 22:40	1886.00	1298.00	58.10
11/15/2018 22:48	1886.00	1298.00	58.10
11/15/2018 22:56	1886.00	1298.00	58.10
11/15/2018 23:04	1886.00	1298.00	58.10
11/15/2018 23:12	1886.00	1298.00	58.10
11/15/2018 23:20	1886.00	1298.00	58.10
11/15/2018 23:28	1886.00	1298.00	58.10
11/15/2018 23:36	1886.00	1298.00	58.10
11/15/2018 23:44	1886.00	1298.00	58.10
11/15/2018 23:52	1886.00	1298.00	58.10

12/9/2018 0:05	1059.00	1364.00	32.62
12/9/2018 0:15	1066.00	1334.00	32.84
12/9/2018 0:25	1059.00	1340.00	32.62
12/9/2018 0:35	1064.00	1370.00	32.78
12/9/2018 0:45	1064.00	1296.00	32.78
12/9/2018 0:55	1060.00	1362.00	32.65
12/9/2018 1:05	1063.00	1280.00	32.74

Investigation Type: SPI
Air Account NO: FG-0536-E
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Attachment 5
Excerpt from NSPS Report December 2018
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
Pages 11

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

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

Prepared for
Blue Ridge Landfill TX, LP
December 2018

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

Project No. 0120-405-50-43

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 5
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December 28, 2018
Project #: 0120-405-50-43

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

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

Dear Mr. Doby:

Pursuant to Title 40 Code of Federal Regulations (CFR) §60.757, §63.10(d)(5)(i), Title 30 Texas Administrative Code (TAC) §122.145 and 30 TAC §122.146 and on behalf of Blue Ridge Landfill TX, LP, please find enclosed two copies of the December 2018 Semi-Annual New Source Performance Standards (NSPS) Report / Title V Deviation and Monitoring Report / Startup, Shutdown and Malfunction (SSM) Report for the Blue Ridge Landfill located in Fort Bend County, Texas. The reporting period for these reports covers the six-month period from June 5, 2018 through December 4, 2018. The TCEQ issued the facility's Title V permit on December 4, 2000. The GOP Authorization to Operate was renewed by TCEQ on March 3, 2016 and was revised April 24, 2018.

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

Sincerely,
Weaver Consultants Group, LLC

Mary-Leigh Ariens
Staff Environmental Scientist

Angie S. Vandergriff
Senior Project Manager

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

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

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 5
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APPENDIX A

Monthly Wellhead Monitoring Data

APPENDIX B

Surface Emissions Monitoring Report by Tetra Tech

APPENDIX C

GCCS Expansion

APPENDIX D

Semi-Annual Deviation and Monitoring Report
(Includes Title V Forms: PCC, DevRep, and OP-CR01)

APPENDIX E

Startup, Shutdown, and Malfunction Report

Investigation Type: SPCI
Air Account NO: PG-0536-E
Attachment: 5
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1 INTRODUCTION

The Blue Ridge Landfill is located in Fort Bend County, Texas. The landfill is subject to the requirements of the Environmental Protection Agency's (EPA) New Source Performance Standards (NSPS) stated within Title 40 Code of Federal Regulations (CFR), Part 60, Subpart WWW for municipal solid waste (MSW) landfills. As a result, the landfill is subject to the NSPS reporting requirements for its active landfill gas collection and control system (GCCS). Since the Blue Ridge Landfill's non-methane organic compound (NMOC) is estimated to be greater than 50 megagrams per year (Mg/yr), the facility is required to report the startup, shutdown, and malfunction (SSM) events per Title 40 CFR Part 63, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants (NESHAP) Maximum Achievable Control Technology (MACT) requirements for MSW Landfills. As stated within Title 40 CFR §60.757(f), an annual NSPS report must be submitted after initial start-up of a GCCS. However, Title 40 CFR §63.1980 requires the facility to submit the report semi-annually.

In addition, in accordance with Title 30 Texas Administrative Code (TAC) §122.145, the facility is required to submit a Semi-Annual Deviation and Monitoring report (see Appendix D).

In accordance with the facility's startup, shutdown, and malfunction (SSM) plan and as required by Title 40 CFR §63.10(d)(5)(i), the facility is submitting a certified SSM Report within this report (see Appendix E).

As such, this report serves to meet the NSPS reporting, Title V reporting, and SSM reporting requirements for the Blue Ridge Landfill. This Semi-Annual NSPS Report / Title V Deviation and Monitoring Report / SSM Report covers the period from June 5, 2018 through December 4, 2018.

Republic Services, Inc.'s Blue Ridge Energy Development, LLC facility no longer is in operation. In November 2018 Blue Ridge Renewables, LLC began operating Blue Ridge LFG Treatment Facility, a landfill gas beneficial use facility at the Blue Ridge Landfill. This facility is owned, operated, and permitted separately from Republic Services Inc.

Investigation Type: SPC I
Air Account NO: FG-0536-E
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Investigation Type: SPCI
Air Account NO: FG-0586-E
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2 NSPS REPORTING REQUIREMENTS

Records are prepared and maintained in accordance with Title 40 CFR §60.758. The primary location for records storage is the Blue Ridge Landfill.

The following summarizes the requirements of §60.757(f), which consists of the reporting requirements within (f)(1) through (f)(6).

§60.757(f)

Each owner or operator of a landfill seeking to comply with §60.752(b)(2) using an active collection system designed in accordance with §60.752(b)(2)(ii) shall submit to the Administrator annual reports of the recorded information in (f)(1) through (f)(6) of this paragraph.

§60.757(f)(1)

Value and length of time for exceedance of applicable parameters monitored under §60.756(a), (b), (c), and (d).

§60.756(a)

(a) Each owner or operator seeking to comply with §60.752(b)(2)(ii)(A) for an active gas collection system shall install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and: (1) Measure the gauge pressure in the gas collection header on a monthly basis as provided in §60.755(a)(3); and

§60.755(a)(3)

For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with §60.752(b)(2)(ii)(A)(3), the owner or operator shall measure gauge pressure in the gas collection header at each individual well, monthly. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under §60.753(b). If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternate timeline for correcting the exceedance may be submitted to the Administrator for approval.

Each wellhead of the GCCS is equipped with a sampling port and a means for measuring the LFG temperature, pressure, and oxygen.

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The gauge pressure at each wellhead is measured on a monthly basis. During the monthly monitoring, if positive pressure existed in an extraction well, corrective action was initiated within 5 calendar days. If the standard was not achieved within 15 days, appropriate action was taken according to the NSPS and the site's approved NSPS Landfill GCCS Design Plan (Design Plan). The monthly monitoring data is provided in Appendix A.

§60.756(a)(2)

2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as provided in §60.755(a)(5); and

§60.755(a)(5)

(5) For the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

The oxygen concentration at each wellhead is measured on a monthly basis. During the monthly monitoring, if oxygen was greater than or equal to 5 percent in an extraction well, corrective action was initiated within 5 calendar days. If the standard was not achieved within 15 days, appropriate action was taken according to the NSPS and the Design Plan. Extraction wells designated as non-producing, as described in the Design Plan, are identified in the monthly monitoring data located in Appendix A.

§60.756(a)(3)

(3) Monitor temperature of the landfill gas on a monthly basis as provided in §60.755(a)(5).

§60.755(a)(5)

(5) For the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

The temperature at each wellhead is measured on a monthly basis. During the monthly monitoring, if the temperature was greater than or equal to 131 degrees Fahrenheit in an extraction well, corrective action was initiated within 5 calendar days. If the standard was not achieved within 15 days, appropriate action was

taken according to the NSPS and the Design Plan. The monthly monitoring data is provided in Appendix A.

§60.756(b)

(b) Each owner or operator seeking to comply with §60.752(b)(2)(iii) using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment.

(1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ± 1 percent of the temperature being measure expressed in degrees Celsius or $\pm 0.5^{\circ}\text{C}$, whichever is greater. A temperature-monitoring device is not required for boilers or process heaters with design heat input capacity greater than 44 megawatts.

(2) A device that records flow to or bypass of the control device. The owner or operator shall either:

(i) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

LFG collected from the landfill is conveyed to the energy facility and/or the flares. The flares are used when there is more landfill gas than the energy facility can use, and during maintenance of the energy facility. The enclosed flare unit is equipped with a thermocouple to measure temperature and an electronic recorder that records temperature information in accordance with §60.756(b)(1). In accordance with the Design Plan, flare flow data is not required to be recorded if the GCCS is designed in such a way that there is no physical means for the LFG flow to bypass the control devices. Given that the GCCS at the Blue Ridge Landfill is designed with no means to bypass the control devices, flow data is not provided in this report.

§60.756(c)

(c) Each owner or operator seeking to comply with §60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

(1) A heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.

(2) A device that records flow to or bypass of the flare. The owner or operator shall either:

(i) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

The site currently operates two utility flares. The flares are used when there is more landfill gas than the energy facility can use, and during maintenance of the energy facility. Thermocouples are installed at the utility flares to measure temperature and monitor the presence of a flame in accordance with §60.756(c)(1). In addition, the utility flares are equipped with flame scanners, which provide flame confirmation. The flame scanners will automatically shut down the blowers in the event that a flame is not detected. In accordance with the Design Plan, flare flow data is not required to be recorded if the GCCS is designed in such a way that there is no physical means for the LFG flow to bypass the control devices. Given that the GCCS at Blue Ridge Landfill is designed with no means to bypass the control devices, flow data is not provided in this report.

§60.756(d)

(d) Each owner or operator seeking to demonstrate compliance with §60.752(b)(2)(iii) using a device other than an open flare or an enclosed combustor shall provide information satisfactory to the Administrator as provided in §60.752(b)(2)(i)(B) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Administrator shall review the information and either approve it, or request that additional information be submitted. The Administrator may specify additional appropriate monitoring procedures.

The landfill gas processing facility at Blue Ridge Landfill treats and processes the collected gas for subsequent sale or use. EPA has determined that landfill gas recovery systems which consist of filtration, de-watering, and compression, are considered to be treatment systems for the purposes of 60.752(b)(2)(iii). The landfill gas treatment and processing facility at Blue Ridge Landfill includes filtration, de-watering and compression, and as such meets the definition of a control device. There are no atmospheric vents on the landfill gas treatment equipment.

§60.757(f)(2)

Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.

The gas stream was not diverted from the control devices through bypass lines and there is no indication of bypass flow. LFG flow continued to be directed to the energy facility and/or the flares; therefore, §60.757(f)(2) is not applicable.

§60.757(f)(3)

Description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not operating.

The flares at the landfill were operated when the LFG was either partially or totally diverted from the energy facility. When the flares are shut down, the fail-safe valve closes to prevent the raw landfill gas from venting into the atmosphere. As specified in the Design Plan, only control device downtimes that result in venting of uncombusted landfill gas will be reported in the NSPS reports. No such events occurred during this reporting period.

§60.757(f)(4)

All periods when the collection system was not operating in excess of 5 days.

During this reporting period, there were no instances when the GCCS was not operating in excess of five days.

§60.757(f)(5)

The location of each exceedance of the 500 parts per million methane concentration as provided in §60.753(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.

NSPS Surface Emissions are performed at the landfill bi-monthly (Every other month) by Tetra Tech. The results from the July and September 2018 SEM indicate that methane emissions at the landfill surface which exceeded the NSPS threshold of 500 ppm or greater above background were remediated and rechecked as required by the NSPS. All areas achieved NSPS compliance. The July and September 2018 SEM Reports are provided in Appendix B.

§60.757(f)(6)

The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), and (c)(4) of §60.755.

During this reporting period, the GCCS was expanded. Several of the new wells have been installed and will be connected to the GCCS and monitored during the next reporting period; see Appendix C for more information. The new and re-drilled extraction wells and the associated piping that have been connected to the GCCS, are contributing to the performance of the GCCS. The landfill continues to have sufficient well density in compliance with the NSPS. Appendix C contains an updated site layout showing the approximate locations of the new and re-drilled wells, and a table with the installation dates. The site layout is being submitted as an update to the site's Design Plan as Drawing A-12.

§60.758(c)(1)(i)

(i) For enclosed combustors except for boilers and process heaters with design heat input capacity of 44 megawatts (150 million British thermal unit per hour) or greater, all 3-hour periods of operation during which the average combustion temperature was more than 28°C below the average combustion temperature during the most recent performance test at which compliance with §60.752(b)(2)(iii) was determined.

During the performance test of the enclosed flare, the average operating stack combustion temperature was 1,548.9°F. For future operations in response to this performance test, all periods longer than (3) hours must be recorded and reported where the operation temperature is more than 28°C below the average operating temperature recorded during the performance test, which is equivalent to 1,499°F. There were no such events during this reporting period.

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3 NESHAP MACT REQUIREMENTS

SSM event records are maintained in accordance with Title 40 CFR §63.1980(a) and (b). The primary location for records storage is the Blue Ridge Landfill facility.

The following summarizes the requirements of §63.1960 and §63.1965(a) and (b), which consist of SSM plan provisions.

§63.1960

Compliance is determined in the same way it is determined for Title 40 CFR part 60, subpart WWW, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence. In addition, continuous parameter monitoring data, collected under Title 40 CFR 60.756(b)(1), (c)(1), and (d) of subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation occurs, you have failed to meet the control device operating conditions described in this subpart and have deviated from the requirements of this subpart. Finally, you must develop and implement a written SSM plan according to the provisions in Title 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site. Failure to write, implement, or maintain a copy of the SSM plan is a deviation from the requirements of this subpart.

The SSM plan was developed and implemented at the Blue Ridge Landfill. The SSM plan and event records are maintained at the site. A copy of the SSM Report for this reporting period is provided in Appendix E.

§63.1965(a)

A deviation occurs when the control device operating parameter boundaries described in 40 CFR 60.758(c)(1) of subpart WWW are exceeded.

There were no deviations as described above during this reporting period.

§63.1965(b)

A deviation occurs when 1 hour or more of the hours during the 3-hour block averaging period does not constitute a valid hour of data. A valid hour of data must have measured values for at least three 15-minute monitoring periods within the hour.

During this reporting period, there were times when the flow data was not recorded. However, these occurred during monitoring system breakdowns; as such per §63.1975 these periods are not to be included in the 3-hour block. Therefore, there are no deviations to be reported during this reporting period.

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Attachment 6
Enclosed Flare Data
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
5/28/2018 0:09	3290.50	1118.00	<60.00
5/28/2018 0:19	3281.33	1182.46	<60.00
5/28/2018 0:29	3294.67	1156.02	<60.00
5/28/2018 0:39	3297.00	1126.76	<60.00
5/28/2018 0:49	3283.66	1149.71	<60.00
5/28/2018 0:59	3287.00	1161.96	<60.00
5/28/2018 1:09	3298.84	1165.45	<60.00
5/28/2018 1:19	3290.17	1163.59	<60.00
5/28/2018 1:29	3285.67	1167.97	<60.00
5/28/2018 1:39	3279.49	1127.13	<60.00
5/28/2018 1:49	3290.00	1089.93	<60.00
5/28/2018 1:59	3280.00	1148.52	<60.00
5/28/2018 2:09	3280.66	1087.77	<60.00
5/28/2018 2:20	3276.66	1087.55	<60.00
5/28/2018 2:30	3272.82	1068.91	<60.00
5/28/2018 2:40	3274.66	1132.63	<60.00
5/28/2018 2:50	3265.15	1102.48	<60.00
5/28/2018 3:00	3273.16	1081.98	<60.00
5/28/2018 3:10	3263.99	1065.72	<60.00
5/28/2018 3:20	3268.49	1070.91	<60.00
5/28/2018 3:30	3267.32	1070.25	<60.00
5/28/2018 3:40	3257.48	1066.83	<60.00
5/28/2018 3:50	3253.65	1056.51	<60.00
5/28/2018 4:00	3256.98	1055.91	<60.00
5/28/2018 4:10	3253.98	1096.02	<60.00
5/28/2018 4:20	3242.14	1096.02	<60.00
5/28/2018 4:30	3254.48	1086.21	<60.00
5/28/2018 4:40	3235.47	1056.21	<60.00
5/28/2018 4:50	3247.81	1092.90	<60.00
5/28/2018 5:00	3238.47	1082.87	<60.00
5/28/2018 5:10	3252.98	1068.61	<60.00
5/28/2018 5:20	3240.81	1092.23	<60.00
5/28/2018 5:30	3228.30	1088.81	<60.00
5/28/2018 5:40	3228.63	1095.20	<60.00
5/28/2018 5:50	3229.97	1061.41	<60.00
5/28/2018 6:00	3224.96	1068.46	<60.00
5/28/2018 6:10	3219.13	1059.48	<60.00
5/28/2018 6:20	3231.30	1084.28	<60.00
5/28/2018 6:30	3220.96	1060.07	<60.00
5/28/2018 6:40	3220.63	1083.98	<60.00
5/28/2018 6:50	3217.96	1063.19	<60.00
5/28/2018 7:00	3206.95	1063.64	<60.00

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
5/28/2018 7:10	3642.36	1171.69	<60.00
5/28/2018 7:20	3716.06	1254.56	<60.00
5/28/2018 7:30	3714.07	1274.62	<60.00
5/28/2018 7:40	3721.05	1275.14	<60.00
5/28/2018 7:50	3721.39	1289.24	<60.00
5/28/2018 8:00	3723.05	1275.73	<60.00
5/28/2018 8:10	3729.54	1317.09	<60.00
5/28/2018 8:20	3731.20	1370.26	<60.00
5/28/2018 8:30	3721.05	1384.08	<60.00
5/28/2018 8:40	3714.90	1382.52	<60.00
5/28/2018 8:50	3703.92	1377.17	<60.00
5/28/2018 9:00	3697.43	1358.16	<60.00
5/28/2018 9:10	3754.83	1383.93	<60.00
5/28/2018 9:20	3747.84	1352.74	<60.00
5/28/2018 9:30	3753.00	1361.65	<60.00
5/28/2018 9:40	3756.66	1346.50	<60.00
5/28/2018 9:50	3761.15	1340.26	<60.00
5/28/2018 10:00	3749.00	1399.08	<60.00
5/28/2018 10:10	3749.17	1407.25	<60.00
5/28/2018 10:20	3748.50	1341.53	<60.00
5/28/2018 10:30	3743.68	1397.52	<60.00
5/28/2018 10:40	3746.01	1382.44	<60.00
5/28/2018 10:50	3739.52	1380.66	<60.00
5/28/2018 11:00	3737.86	1370.04	<60.00
5/28/2018 11:10	3728.21	1312.79	<60.00
5/28/2018 11:20	3739.52	1325.71	<60.00
5/28/2018 11:30	3737.36	1362.10	<60.00
5/28/2018 11:40	3742.68	1366.48	<60.00
5/28/2018 11:50	3737.36	1360.24	<60.00
5/28/2018 12:00	3731.54	1361.20	<60.00
5/28/2018 12:10	3731.87	1321.62	<60.00
5/28/2018 12:20	3731.04	1352.74	<60.00
5/28/2018 12:30	3729.87	1350.36	<60.00
5/28/2018 12:40	3731.04	1335.96	<60.00
5/28/2018 12:50	3723.38	1343.46	<60.00
5/28/2018 13:00	3724.05	1426.94	<60.00
5/28/2018 13:10	3716.23	1367.89	<60.00
5/28/2018 13:20	3700.09	1386.23	<60.00
5/28/2018 13:30	3700.09	1397.67	<60.00
5/28/2018 13:40	3695.93	1398.04	<60.00
5/28/2018 13:50	3694.27	1328.38	<60.00
5/28/2018 14:00	3693.44	1346.58	<60.00
5/28/2018 14:10	3698.93	1326.67	<60.00

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Actual Velocity (ft/sec)
5/28/2018 14:20	3702.09	1344.79	<60.00
5/28/2018 14:30	3694.60	1365.22	<60.00
5/28/2018 14:40	3687.78	1358.53	<60.00
5/28/2018 14:50	3689.78	1333.36	<60.00
5/28/2018 15:00	3693.77	1368.71	<60.00
5/28/2018 15:10	3694.77	1353.56	<60.00
5/28/2018 15:20	3672.81	1355.78	<60.00
5/28/2018 15:30	3651.51	1350.07	<60.00
5/28/2018 15:40	3666.49	1342.64	<60.00
5/28/2018 15:50	3656.51	1323.48	<60.00
5/28/2018 16:00	3656.84	1323.41	<60.00
5/28/2018 16:10	3072.71	1363.28	<60.00
5/28/2018 16:20	3326.52	1197.98	<60.00
5/28/2018 16:30	3340.03	1207.41	<60.00
5/28/2018 16:40	3324.85	1209.71	<60.00
5/28/2018 16:50	3335.36	1215.50	<60.00
5/28/2018 17:00	3332.19	1212.24	<60.00
5/28/2018 17:10	3325.35	1258.43	<60.00
5/28/2018 17:20	3319.18	1222.71	<60.00
5/28/2018 17:30	3329.02	1214.83	<60.00
5/28/2018 17:40	3324.85	1229.91	<60.00
5/28/2018 17:50	3300.51	1229.61	<60.00
5/28/2018 18:00	3308.18	1250.33	<60.00
5/28/2018 18:10	3303.68	1249.37	<60.00
5/28/2018 18:20	3290.33	1267.04	<60.00
5/28/2018 18:30	3285.50	1240.08	<60.00
5/28/2018 18:40	3291.17	1228.65	<60.00
5/28/2018 18:50	3285.83	1227.24	<60.00
5/28/2018 19:00	3275.66	1223.52	<60.00
5/28/2018 19:10	3285.50	1208.37	<60.00
5/28/2018 19:20	3287.83	1190.62	<60.00
5/28/2018 19:30	3271.99	1202.51	<60.00
5/28/2018 19:40	3275.66	1178.37	<60.00
5/28/2018 19:50	3268.16	1191.14	<60.00
5/28/2018 20:00	3253.31	1173.84	<60.00
5/28/2018 20:10	3267.15	1182.53	<60.00
5/28/2018 20:20	3255.98	1168.79	<60.00
5/28/2018 20:29	3248.14	1173.17	<60.00
5/28/2018 20:39	3248.31	1169.46	<60.00
5/28/2018 20:49	3243.64	1197.75	<60.00
5/28/2018 20:59	3248.14	1181.86	<60.00
5/28/2018 21:09	3245.14	1168.12	<60.00
5/28/2018 21:19	3251.65	1163.74	<60.00

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity of (ft/sec)
5/28/2018 21:29	3242.14	1170.65	<60.00
5/28/2018 21:39	3245.31	1171.39	<60.00
5/28/2018 21:49	3236.80	1169.53	<60.00
5/28/2018 21:59	3242.81	1162.78	<60.00
5/28/2018 22:09	3245.98	1156.61	<60.00
5/28/2018 22:19	3255.65	1193.08	<60.00
5/28/2018 22:29	3255.31	1181.19	<60.00
5/28/2018 22:39	3248.48	1153.49	<60.00
5/28/2018 22:49	3243.64	1173.40	<60.00
5/28/2018 22:59	3246.98	1184.46	<60.00
5/28/2018 23:09	3244.81	1113.91	<60.00
5/28/2018 23:19	3235.64	1116.21	<60.00
5/28/2018 23:29	3240.31	1103.74	<60.00
5/28/2018 23:39	3235.47	1106.49	<60.00
5/28/2018 23:49	3235.30	1105.37	<60.00
5/28/2018 23:59	3229.97	1107.82	<60.00
5/29/2018 0:09	3226.46	1096.02	<60.00
5/29/2018 0:19	3239.14	1086.36	<60.00
5/29/2018 0:29	3230.97	1077.23	<60.00
5/29/2018 0:39	3229.63	1102.40	<60.00
5/29/2018 0:49	3235.64	1090.89	<60.00
5/29/2018 0:59	3222.46	1085.69	<60.00
5/29/2018 1:09	3220.13	1095.12	<60.00
5/29/2018 1:19	3220.46	1073.88	<60.00
5/29/2018 1:29	3220.46	1070.47	<60.00
5/29/2018 1:39	3224.80	1081.68	<60.00
5/29/2018 1:49	3214.46	1070.10	<60.00
5/29/2018 1:59	3223.13	1056.58	<60.00
5/29/2018 2:09	3224.46	1051.75	<60.00
5/29/2018 2:19	3225.30	1075.89	<60.00
5/29/2018 2:29	3222.80	1077.23	<60.00
5/29/2018 2:39	3216.96	1068.39	<60.00
5/29/2018 2:49	3220.29	1075.44	<60.00
5/29/2018 2:59	3214.96	1069.95	<60.00
5/29/2018 3:09	3211.29	1080.05	<60.00
5/29/2018 3:19	3210.46	1086.36	<60.00
5/29/2018 3:29	3204.62	1061.56	<60.00
5/29/2018 3:39	3216.46	1057.18	<60.00
5/29/2018 3:49	3208.29	1048.33	<60.00
5/29/2018 3:59	3209.29	1070.77	<60.00
5/29/2018 4:09	3196.61	1062.89	<60.00
5/29/2018 4:19	3209.62	1065.20	<60.00
5/29/2018 4:29	3198.28	1069.06	<60.00

Blue Ridge Landfill
FLARE2011 (Enclosed Flare)

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Page 5 Velocity 12 (ft/sec)

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
5/29/2018 4:39	3200.45	1051.61	<60.00
5/29/2018 4:49	3206.79	1049.68	<60.00
5/29/2018 4:59	3208.12	1066.76	<60.00
5/29/2018 5:09	3196.61	1066.61	<60.00
5/29/2018 5:19	3190.28	1052.05	<60.00
5/29/2018 5:29	3176.27	1046.61	<60.00
5/29/2018 5:39	3181.94	1047.28	<60.00
5/29/2018 5:49	3206.45	1061.41	<60.00
5/29/2018 5:59	3189.11	1056.28	<60.00
5/29/2018 6:09	3180.77	1054.65	<60.00
5/29/2018 6:19	3174.77	1046.39	<60.00
5/29/2018 6:29	3174.77	1044.97	<60.00
5/29/2018 6:39	3170.43	1031.43	<60.00
5/29/2018 6:49	3164.26	1052.79	<60.00
5/29/2018 6:59	3168.26	1037.86	<60.00
5/29/2018 7:09	3163.43	1038.24	<60.00
5/29/2018 7:19	3172.77	1038.68	<60.00
5/29/2018 7:29	3178.60	1046.61	<60.00
5/29/2018 7:39	3182.61	1060.96	<60.00
5/29/2018 7:49	3183.27	1073.59	<60.00
5/29/2018 7:59	3187.44	1071.81	<60.00
5/29/2018 8:09	3180.44	1092.23	<60.00
5/29/2018 8:19	3182.11	1102.92	<60.00
5/29/2018 8:29	3181.61	1126.61	<60.00
5/29/2018 8:39	3184.61	1117.33	<60.00
5/29/2018 8:49	3185.44	1157.21	<60.00
5/29/2018 8:59	3190.44	1137.60	<60.00
5/29/2018 9:09	3190.61	1114.13	<60.00
5/29/2018 9:19	3194.11	1145.70	<60.00
5/29/2018 9:29	3191.44	1105.45	<60.00
5/29/2018 9:29	3192.61	1105.89	<60.00
5/29/2018 9:29	3186.94	1106.34	<60.00
5/29/2018 9:29	3180.27	1108.27	<60.00
5/29/2018 9:29	3183.61	1109.53	<60.00
5/29/2018 9:30	3188.11	1248.18	<60.00
5/29/2018 9:30	3187.28	1287.98	<60.00
5/29/2018 9:31	3186.11	1320.44	<60.00
5/29/2018 9:31	3187.44	1352.14	<60.00
5/29/2018 9:31	3185.27	1668.81	<60.00
5/29/2018 9:38	2278.79	1164.56	<60.00
5/29/2018 9:39	556.96	1106.78	<60.00
5/29/2018 9:39	556.96	1106.04	<60.00
5/29/2018 9:39	547.80	1094.16	<60.00

Blue Ridge Landfill
FLARE2011 (Enclosed Flare)

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity of (ft/sec)
5/29/2018 9:40	512.32	985.38	<60.00
5/29/2018 9:40	510.15	972.66	<60.00
5/29/2018 9:43	26.36	658.68	<60.00
5/29/2018 9:49	4423.79	1721.48	<60.00
5/29/2018 9:59	4554.44	1749.30	<60.00
5/29/2018 10:09	4303.98	1709.09	<60.00
5/29/2018 10:19	4216.88	1630.24	<60.00
5/29/2018 10:29	4384.57	1629.34	<60.00
5/29/2018 10:39	4208.20	1647.47	<60.00
5/29/2018 10:49	4337.85	1708.87	<60.00
5/29/2018 10:59	3105.90	1503.78	<60.00
5/29/2018 11:09	3708.74	1666.79	<60.00
5/29/2018 11:19	3684.79	1623.75	<60.00
5/29/2018 11:29	3610.92	1576.45	<60.00
5/29/2018 11:39	4305.98	1694.47	<60.00
5/29/2018 11:49	4407.43	1701.18	<60.00
5/29/2018 11:59	4224.05	1594.88	<60.00
5/29/2018 12:09	4335.02	1670.08	<60.00
5/29/2018 12:19	4272.94	1660.30	<60.00
5/29/2018 12:29	3071.04	1608.60	<60.00
5/29/2018 12:39	3065.87	1589.50	<60.00
5/29/2018 12:49	3206.12	1593.46	<60.00
5/29/2018 12:59	4457.49	1666.42	<60.00
5/29/2018 13:09	4406.60	1697.38	<60.00
5/29/2018 13:19	4398.76	1686.79	<60.00
5/29/2018 13:29	4438.30	1693.95	<60.00
5/29/2018 13:39	4475.51	1653.07	<60.00
5/29/2018 13:49	4364.05	1656.65	<60.00
5/29/2018 13:59	4382.07	1662.54	<60.00
5/29/2018 14:09	4537.25	1673.36	<60.00
5/29/2018 14:19	4399.93	1667.09	<60.00
5/29/2018 14:29	4408.60	1663.44	<60.00
5/29/2018 14:39	4419.78	1643.07	<60.00
5/29/2018 14:49	4393.58	1668.43	<60.00
5/29/2018 14:59	4414.94	1647.40	<60.00
5/29/2018 15:09	4399.26	1669.03	<60.00
5/29/2018 15:19	4417.45	1647.99	<60.00
5/29/2018 15:29	4383.07	1654.48	<60.00
5/29/2018 15:39	4426.12	1651.57	<60.00
5/29/2018 15:49	4393.92	1655.08	<60.00
5/29/2018 15:59	4386.74	1642.92	<60.00
5/29/2018 16:09	4446.48	1648.96	<60.00
5/29/2018 16:19	4400.76	1642.55	<60.00

Blue Ridge Landfill
FLARE2011 (Enclosed Flare)

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Velocity (ft/sec)

Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
10/26/2018 22:14	0.00	---	---
10/26/2018 22:15	68.12	860.36	<60.00
10/26/2018 22:19	0.00	---	---
10/26/2018 22:20	0.00	---	---
10/26/2018 22:29	4381.74	1821.25	<60.00
10/26/2018 22:39	4383.24	1816.78	<60.00
10/26/2018 22:49	4350.53	1771.24	<60.00
10/26/2018 22:59	4354.54	1757.36	<60.00
10/26/2018 23:09	4308.32	1743.11	<60.00
10/26/2018 23:19	4148.44	1726.77	<60.00
10/26/2018 23:29	4134.97	1708.87	<60.00
10/26/2018 23:39	4110.18	1703.87	<60.00
10/26/2018 23:49	4098.70	1704.02	<60.00
10/26/2018 23:59	4086.06	1695.96	<60.00
10/27/2018 0:09	4058.11	1700.21	<60.00
10/27/2018 0:13	4118.66	1690.44	<60.00
10/27/2018 0:13	3476.83	1689.32	<60.00
10/27/2018 0:19	2236.61	1628.07	<60.00
10/27/2018 0:29	2255.38	1605.77	<60.00
10/27/2018 0:33	2050.55	1628.15	<60.00
10/27/2018 0:39	1378.93	983.73	<60.00
10/27/2018 0:49	1553.11	675.39	<60.00
10/27/2018 0:51	1537.26	665.29	<60.00
10/27/2018 0:59	1183.41	646.87	<60.00
10/27/2018 1:02	1137.15	603.05	<60.00
10/27/2018 1:08	1030.32	533.01	<60.00
10/27/2018 1:18	850.11	459.33	<60.00
10/27/2018 1:28	743.34	396.59	<60.00
10/27/2018 1:38	685.21	357.21	<60.00
10/27/2018 1:48	594.43	328.63	<60.00
10/27/2018 1:55	1834.14	308.72	<60.00
10/27/2018 1:56	1868.32	311.03	<60.00
10/27/2018 1:58	0.00	---	---
10/27/2018 1:58	0.00	---	---
10/27/2018 1:58	0.00	---	---
10/27/2018 2:00	611.09	326.32	<60.00
10/27/2018 2:00	1117.01	325.35	<60.00
10/27/2018 2:00	1682.24	325.13	<60.00
10/27/2018 2:00	2176.77	325.13	<60.00
10/27/2018 2:00	2593.93	324.98	<60.00
10/27/2018 2:02	2850.58	366.75	<60.00
10/27/2018 2:02	2795.55	374.36	<60.00
10/27/2018 2:02	2743.19	382.27	<60.00

Blue Ridge Landfill
FLARE2011 (Enclosed Flare)

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
10/27/2018 2:02	2726.68	389.58	<60.00
10/27/2018 2:02	2700.16	398.31	<60.00
10/27/2018 2:05	2289.42	925.79	<60.00
10/27/2018 2:05	2290.75	944.85	<60.00
10/27/2018 2:06	2284.94	963.84	<60.00
10/27/2018 2:06	2280.45	981.86	<60.00
10/27/2018 2:06	2280.12	1003.10	<60.00
10/27/2018 2:08	2325.79	1767.81	<60.00
10/27/2018 2:10	2320.14	1615.39	<60.00
10/27/2018 2:10	2329.28	1611.74	<60.00
10/27/2018 2:10	2330.27	1608.60	<60.00
10/27/2018 2:11	2337.41	1606.44	<60.00
10/27/2018 2:11	2352.19	1604.50	<60.00
10/27/2018 2:11	2299.72	1607.41	<60.00
10/27/2018 2:11	2132.25	1610.02	<60.00
10/27/2018 2:14	518.31	1232.95	<60.00
10/27/2018 2:14	518.98	1218.84	<60.00
10/27/2018 2:14	633.24	1199.91	<60.00
10/27/2018 2:14	996.21	1187.06	<60.00
10/27/2018 2:14	1557.28	1173.54	<60.00
10/27/2018 2:14	2060.89	1162.03	<60.00
10/27/2018 2:14	2393.05	1149.48	<60.00
10/27/2018 2:15	2295.90	1104.70	<60.00
10/27/2018 2:15	2146.25	1100.99	<60.00
10/27/2018 2:15	1113.69	1107.23	<60.00
10/27/2018 2:15	886.55	1110.27	<60.00
10/27/2018 2:16	561.12	1118.37	<60.00
10/27/2018 2:16	549.80	1117.18	<60.00
10/27/2018 2:16	562.45	1114.28	<60.00
10/27/2018 2:18	496.66	908.22	<60.00
10/27/2018 2:20	495.16	787.02	<60.00
10/27/2018 2:20	507.16	781.11	<60.00
10/27/2018 2:20	609.59	775.95	<60.00
10/27/2018 2:21	1659.22	759.58	<60.00
10/27/2018 2:21	1737.93	755.47	<60.00
10/27/2018 2:23	1592.31	667.59	<60.00
10/27/2018 2:25	1534.42	578.39	<60.00
10/27/2018 2:25	1618.17	575.19	<60.00
10/27/2018 2:25	1826.63	571.56	<60.00
10/27/2018 2:25	2105.91	568.96	<60.00
10/27/2018 2:25	2310.84	566.13	<60.00
10/27/2018 2:26	2014.87	575.64	<60.00
10/27/2018 2:26	1699.59	582.99	<60.00

Blue Ridge Landfill
FLARE2011 (Enclosed Flare)

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
10/27/2018 2:27	1554.94	635.43	<60.00
10/27/2018 2:28	1543.76	663.81	<60.00
10/27/2018 2:38	1726.26	632.76	<60.00
10/27/2018 2:48	1687.75	620.65	<60.00
10/27/2018 2:58	1678.07	619.02	<60.00
10/27/2018 3:08	1670.56	512.15	<60.00
10/27/2018 3:18	1722.93	563.83	<60.00
10/27/2018 3:27	1691.58	551.80	<60.00
10/27/2018 3:28	1754.11	505.13	<60.00
10/27/2018 3:28	1754.11	504.61	<60.00
10/27/2018 3:38	4365.55	1828.33	<60.00
10/27/2018 3:48	4367.55	1781.76	<60.00
10/27/2018 3:58	4368.72	1746.84	<60.00
10/27/2018 4:08	4369.72	1733.34	<60.00
10/27/2018 4:18	4370.56	1728.94	<60.00
10/27/2018 4:28	4370.06	1726.70	<60.00
10/27/2018 4:38	4370.89	1719.61	<60.00
10/27/2018 4:48	4371.56	1712.38	<60.00
10/27/2018 4:58	4372.56	1706.03	<60.00
10/27/2018 5:08	4372.39	1708.35	<60.00
10/27/2018 5:18	4372.89	1703.50	<60.00
10/27/2018 5:18	4371.23	1700.51	<60.00
10/27/2018 5:28	4371.73	1700.14	<60.00
10/27/2018 5:38	4370.89	1699.99	<60.00
10/27/2018 5:48	4371.39	1701.48	<60.00
10/27/2018 5:58	4370.56	1695.81	<60.00
10/27/2018 6:08	4371.06	1700.21	<60.00
10/27/2018 6:18	4370.89	1702.60	<60.00
10/27/2018 6:28	4370.39	1699.10	<60.00
10/27/2018 6:38	4371.56	1700.81	<60.00
10/27/2018 6:48	4371.06	1700.14	<60.00
10/27/2018 6:58	4370.56	1698.28	<60.00
10/27/2018 7:08	4370.56	1700.14	<60.00
10/27/2018 7:18	4369.89	1699.17	<60.00
10/27/2018 7:28	4370.56	1701.93	<60.00
10/27/2018 7:38	4370.56	1715.96	<60.00
10/27/2018 7:48	4370.06	1698.42	<60.00
10/27/2018 7:58	4370.39	1690.74	<60.00
10/27/2018 8:08	4369.56	1700.81	<60.00
10/27/2018 8:18	4369.72	1700.59	<60.00
10/27/2018 8:28	4371.23	1700.74	<60.00
10/27/2018 8:38	4371.56	1706.03	<60.00
10/27/2018 8:48	4372.23	1702.53	<60.00

Blue Ridge Landfill
FLARE2011 (Enclosed Flare)

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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
10/31/2018 19:53	3802.07	1746.02	<60.00
10/31/2018 20:03	3783.77	1775.27	<60.00
10/31/2018 20:13	3799.91	1778.18	<60.00
10/31/2018 20:23	3792.09	1791.45	<60.00
10/31/2018 20:33	3774.12	1796.68	<60.00
10/31/2018 20:43	3788.43	1778.40	<60.00
10/31/2018 21:03	3771.46	1831.23	<60.00
10/31/2018 21:13	3773.96	1830.41	<60.00
10/31/2018 21:18	0.00	---	---
10/31/2018 21:18	0.00	---	---
10/31/2018 21:23	0.00	---	---
10/31/2018 21:33	0.00	---	---
10/31/2018 21:43	0.00	---	---
10/31/2018 21:46	0.00	---	---
10/31/2018 21:46	0.00	---	---
10/31/2018 21:46	0.00	---	---
10/31/2018 21:51	1458.51	116.63	<60.00
10/31/2018 21:51	1666.06	115.58	<60.00
10/31/2018 21:53	4404.76	714.27	<60.00
10/31/2018 21:59	1561.45	37.38	<60.00
10/31/2018 21:59	371.07	-447.01	<60.00
10/31/2018 21:59	0.00	---	---
10/31/2018 22:03	0.00	---	---
10/31/2018 22:13	0.00	---	---
10/31/2018 22:23	0.00	---	---
10/31/2018 22:33	0.00	---	---
10/31/2018 22:43	0.00	---	---
10/31/2018 22:53	0.00	---	---
11/1/2018 1:55	2113.74	62.54	<60.00
11/1/2018 2:05	1852.64	62.62	<60.00
11/1/2018 2:07	1818.46	63.66	<60.00
11/1/2018 2:07	2267.17	63.95	<60.00
11/1/2018 2:15	4432.46	1743.93	<60.00
11/1/2018 2:25	4457.16	1712.30	<60.00
11/1/2018 2:35	4468.34	1739.38	<60.00
11/1/2018 2:45	4476.52	1761.69	<60.00
11/1/2018 2:55	4481.86	1775.86	<60.00
11/1/2018 3:05	4484.86	1736.40	<60.00
11/1/2018 3:15	4489.70	1683.35	<60.00
11/1/2018 3:25	4497.37	1709.02	<60.00
11/1/2018 3:35	4493.70	1705.36	<60.00
11/1/2018 3:45	4497.87	1737.74	<60.00
11/1/2018 3:55	4499.38	1683.80	<60.00

Blue Ridge Landfill
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
11/1/2018 4:05	4493.54	1703.20	<60.00
11/1/2018 4:15	4480.85	1737.14	<60.00
11/1/2018 4:25	4476.01	1720.58	<60.00
11/1/2018 4:35	4460.00	1725.13	<60.00
11/1/2018 4:45	4465.00	1682.01	<60.00
11/1/2018 4:55	4460.33	1734.31	<60.00
11/1/2018 5:05	4459.16	1716.48	<60.00
11/1/2018 5:15	4442.81	1737.14	<60.00
11/1/2018 5:25	4448.32	1758.41	<60.00
11/1/2018 5:35	4447.65	1749.90	<60.00
11/1/2018 5:45	4442.48	1750.12	<60.00
11/1/2018 5:47	4428.96	1731.77	<60.00
11/1/2018 5:55	4428.96	1659.33	<60.00
11/1/2018 6:05	4421.45	1676.79	<60.00
11/1/2018 6:15	4420.28	1697.98	<60.00
11/1/2018 6:25	4419.62	1732.44	<60.00
11/1/2018 6:35	4408.44	1670.08	<60.00
11/1/2018 6:44	4405.27	1650.23	<60.00
11/1/2018 6:54	4400.59	1639.04	<60.00
11/1/2018 7:04	4384.07	1665.15	<60.00
11/1/2018 7:14	4395.59	1646.95	<60.00
11/1/2018 7:24	4398.59	1640.38	<60.00
11/1/2018 7:34	4385.74	1657.39	<60.00
11/1/2018 7:44	4377.40	1621.51	<60.00
11/1/2018 7:54	4377.73	1627.25	<60.00
11/1/2018 8:04	4362.72	1615.76	<60.00
11/1/2018 8:14	4361.88	1606.14	<60.00
11/1/2018 8:24	4365.22	1618.97	<60.00
11/1/2018 8:34	4356.21	1609.42	<60.00
11/1/2018 8:44	4357.21	1617.11	<60.00
11/1/2018 8:44	4354.21	1612.63	<60.00
11/1/2018 8:54	4349.70	1579.95	<60.00
11/1/2018 9:04	4338.69	1579.66	<60.00
11/1/2018 9:14	4345.19	1609.42	<60.00
11/1/2018 9:24	4344.69	1628.15	<60.00
11/1/2018 9:34	4338.02	1607.18	<60.00
11/1/2018 9:44	4365.22	1665.67	<60.00
11/1/2018 9:54	4356.71	1647.40	<60.00
11/1/2018 10:02	994.05	1583.09	<60.00
11/1/2018 10:03	934.14	1565.03	<60.00
11/1/2018 10:04	524.48	1177.93	<60.00
11/1/2018 10:05	923.16	1124.38	<60.00
11/1/2018 10:06	1026.33	987.92	<60.00

Blue Ridge Landfill
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Date & Time	Gas Flow (SCFM)	Flame Temperature (°F)	Velocity (ft/sec)
11/1/2018 10:06	1033.15	965.56	<60.00
11/1/2018 10:06	1058.44	915.47	<60.00
11/1/2018 10:07	1072.59	889.15	<60.00
11/1/2018 10:07	1080.41	880.03	<60.00
11/1/2018 10:07	1094.72	856.85	<60.00
11/1/2018 10:07	1115.18	842.20	<60.00
11/1/2018 10:07	1117.35	803.47	<60.00
11/1/2018 10:08	1112.19	789.04	<60.00
11/1/2018 10:08	1118.35	778.79	<60.00
11/1/2018 10:08	1244.12	772.81	<60.00
11/1/2018 10:09	4410.60	758.61	<60.00
11/1/2018 10:11	4496.54	1266.00	<60.00
11/1/2018 10:11	4498.54	1285.31	<60.00
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Attachment 7
PCC and DR 12/5/17-6/4/18
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
Pages 5



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

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

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

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

Investigation Type: SPC I
 Air Account NO: FG-0536-E
 Attachment: 7
 Page 1 of 5



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

AIR CO/RN102610102/RP

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

Dev Item No.	STEERS Incident No.	Deviation Period			No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	Time	End Time			
1	N/A	12/5/2017		6/4/2018	1	Flare observation records were maintained on days the facility was operational. However, when the site was closed daily flare observations were not conducted.	On September 28, 2017 the TCEQ issued a memorandum which states that enforcement action will not be taken for missing flare observations on days that the landfill is closed. The landfill will continue to maintain flare observation records during landfill operational days.

Total Deviations: 1		Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
---------------------	--	---	--

\\VALUED\BLUE RIDGE\NFS\6-2018\DEVREP_FORM\1\3.DOC

TCEQ-10101 [04/09]

Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Investigation Type: SOCI
Air Account NO: FG-0536-E
Attachment 1 of 1
Page 2 of 5

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

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

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

APPENDIX E

STARTUP, SHUTDOWN, AND MALFUNCTION REPORT

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 7
Page 4 of 5

**Semi-Annual Startup, Shutdown, and Malfunction Report
for December 5, 2017 through June 4, 2018
for Blue Ridge Landfill
TCEQ Account No. FG-0536-E
CN 602820599 RN 102610102**

Regulatory Requirement

As per Title 40 Code of Federal Regulations (40 CFR) Part 63, Subpart AAAAA – National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills, the Blue Ridge Landfill (Facility) is required to meet the startup, shutdown, and malfunction (SSM) requirements of the general provisions within 40 CFR Part 63. Thus, the Facility is required to implement and maintain an SSM plan for the gas collection and control system and flares. Since the Energy Facility is owned and operated by a separate entity, SSM events associated with the Energy Facility are covered by its SSM plan and are not included as part of this report. In accordance with 40 CFR Part 63, Subpart A, specifically §63.10(d)(5)(i), the Facility is required to submit a certified SSM report semi-annually, if an SSM event occurred during the reporting period. Although no reportable events occurred during the reporting period, this report is being submitted for recordkeeping purposes.

Demonstration of Compliance

The Facility implemented an SSM Plan on June 26, 2004. During the reporting period of December 5, 2017 to June 4, 2018, there were no malfunctions as defined by 40 CFR Part 63.2, and no events are believed to have caused, or had the potential to cause, any applicable emission limitation to be exceeded. Therefore, there are no startups, shutdowns or malfunctions to be reported in accordance with §63.10(d)(5)(i). Additionally, there were no revisions made to the Facility's SSM Plan during the reporting period.

Certification

The signature below indicates that I certify that the information provided within this report is true and accurate to the best of my knowledge and belief.

Duly Authorized Representative: Burgess Stengl, Environmental Manager

Signature: _____



Date: _____

6/28/18

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 7
Page 5 of 5

Attachment 8
Excerpt from NSPS Report July 2018
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
Pages 12

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

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

Prepared for
Blue Ridge Landfill TX, LP
July 2018

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

Project No. 0120-405-50-43

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 8
Page 1 of 12



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

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

Investigation Type: SPC-I
Air Account NO: FG-0536-E
Attachment: 8
Page 2 of 12

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

Dear Mr. Doby:

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

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

Sincerely,
Weaver Consultants Group, LLC

Mary-Leigh Winkler
Environmental Scientist

for: Angie S. Vandergriff
Senior Project Manager

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

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

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APPENDIX A

Monthly Wellhead Monitoring Data

APPENDIX B

Quarterly Surface Emissions Monitoring Report by Tetra Tech

APPENDIX C

GCCS Expansion

APPENDIX D

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

APPENDIX E

Startup, Shutdown, and Malfunction Report

Investigation Type: SPCI
Air Account NO: FG-0536-E
Attachment: 8
Page 3 of 12

1 INTRODUCTION

The Blue Ridge Landfill is located in Fort Bend County, Texas. The landfill is subject to the requirements of the Environmental Protection Agency's (EPA) New Source Performance Standards (NSPS) stated within Title 40 Code of Federal Regulations (CFR), Part 60, Subpart WWW for municipal solid waste (MSW) landfills. As a result, the landfill is subject to the NSPS reporting requirements for its active landfill gas collection and control system (GCCS). Since the Blue Ridge Landfill's non-methane organic compound (NMOC) is estimated to be greater than 50 megagrams per year (Mg/yr), the facility is required to report the startup, shutdown, and malfunction (SSM) events per Title 40 CFR Part 63, Subpart AAAAA – National Emission Standards for Hazardous Air Pollutants (NESHAP) Maximum Achievable Control Technology (MACT) requirements for MSW Landfills. As stated within Title 40 CFR §60.757(f), an annual NSPS report must be submitted after initial start-up of a GCCS. However, Title 40 CFR §63.1980 requires the facility to submit the report semi-annually.

In addition, in accordance with Title 30 Texas Administrative Code (TAC) §122.145, the facility is required to submit a Semi-Annual Deviation and Monitoring report (see Appendix D).

In accordance with the facility's startup, shutdown, and malfunction (SSM) plan and as required by Title 40 CFR §63.10(d)(5)(i), the facility is submitting a certified SSM Report within this report (see Appendix E).

As such, this report serves to meet the NSPS reporting, Title V reporting, and SSM reporting requirements for the Blue Ridge Landfill. This Semi-Annual NSPS Report / Title V Deviation and Monitoring Report / SSM Report covers the period from December 5, 2017 through June 4, 2018.

Republic Services, Inc. owns the landfill gas beneficial use facility at the Blue Ridge Landfill which operates as Blue Ridge Energy Development, LLC.

Investigation Type: SPC I
Air Account NO: EG-0536-E
Attachment: 8
Page 4 of 12

2 NSPS REPORTING REQUIREMENTS

Records are prepared and maintained in accordance with Title 40 CFR §60.758. The primary location for records storage is the Blue Ridge Landfill.

The following summarizes the requirements of §60.757(f), which consists of the reporting requirements within (f)(1) through (f)(6).

§60.757(f)

Each owner or operator of a landfill seeking to comply with §60.752(b)(2) using an active collection system designed in accordance with §60.752(b)(2)(ii) shall submit to the Administrator annual reports of the recorded information in (f)(1) through (f)(6) of this paragraph.

§60.757(f)(1)

Value and length of time for exceedance of applicable parameters monitored under §60.756(a), (b), (c), and (d).

§60.756(a)

(a) Each owner or operator seeking to comply with §60.752(b)(2)(ii)(A) for an active gas collection system shall install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and: (1) Measure the gauge pressure in the gas collection header on a monthly basis as provided in §60.755(a)(3); and

§60.755(a)(3)

For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with §60.752(b)(2)(ii)(A)(3), the owner or operator shall measure gauge pressure in the gas collection header at each individual well, monthly. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under §60.753(b). If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternate timeline for correcting the exceedance may be submitted to the Administrator for approval.

Each wellhead of the GCCS is equipped with a sampling port and a means for measuring the LFG temperature, pressure, and oxygen.

The gauge pressure at each wellhead is measured on a monthly basis. During the monthly monitoring, if positive pressure existed in an extraction well, corrective action was initiated within 5 calendar days. If the standard was not achieved within 15 days, appropriate action was taken according to the NSPS and the site's approved NSPS Landfill GCCS Design Plan (Design Plan). The monthly monitoring data is provided in Appendix A.

§60.756(a)(2)

2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as provided in §60.755(a)(5); and

§60.755(a)(5)

(5) For the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

The oxygen concentration at each wellhead is measured on a monthly basis. During the monthly monitoring, if oxygen was greater than or equal to 5 percent in an extraction well, corrective action was initiated within 5 calendar days. If the standard was not achieved within 15 days, appropriate action was taken according to the NSPS and the Design Plan. Extraction wells designated as non-producing, as described in the Design Plan, are identified in the monthly monitoring data located in Appendix A.

§60.756(a)(3)

(3) Monitor temperature of the landfill gas on a monthly basis as provided in §60.755(a)(5).

§60.755(a)(5)

(5) For the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

The temperature at each wellhead is measured on a monthly basis. All wells met the NSPS standard for temperature during this reporting period. The monthly monitoring data is provided in Appendix A.

§60.756(b)

(b) Each owner or operator seeking to comply with §60.752(b)(2)(iii) using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment.

(1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ± 1 percent of the temperature being measure expressed in degrees Celsius or $\pm 0.5^{\circ}\text{C}$, whichever is greater. A temperature-monitoring device is not required for boilers or process heaters with design heat input capacity greater than 44 megawatts.

(2) A device that records flow to or bypass of the control device. The owner or operator shall either:

(i) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

LFG collected from the landfill is conveyed to the energy facility and/or the flares. The flares are used when there is more landfill gas than the energy facility can use, and during maintenance of the energy facility. The enclosed flare unit is equipped with a thermocouple to measure temperature and an electronic recorder that records temperature information in accordance with §60.756(b)(1). In accordance with the Design Plan, flare flow data is not required to be recorded if the GCCS is designed in such a way that there is no physical means for the LFG flow to bypass the control devices. Given that the GCCS at the Blue Ridge Landfill is designed with no means to bypass the control devices, flow data is not provided in this report.

§60.756(c)

(c) Each owner or operator seeking to comply with §60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

(1) A heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.

(2) A device that records flow to or bypass of the flare. The owner or operator shall either:

(i) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or

(ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

The site currently operates two utility flares. The flares are used when there is more landfill gas than the energy facility can use, and during maintenance of the energy facility. Thermocouples are installed at the utility flares to measure temperature and monitor the presence of a flame in accordance with §60.756(c)(1). In addition,

the utility flares are equipped with flame scanners, which provide flame confirmation. The flame scanners will automatically shut down the blowers in the event that a flame is not detected. In accordance with the Design Plan, flare flow data is not required to be recorded if the GCCS is designed in such a way that there is no physical means for the LFG flow to bypass the control devices. Given that the GCCS at Blue Ridge Landfill is designed with no means to bypass the control devices, flow data is not provided in this report.

Due to a malfunction of a thermocouple, the data recorder did not record an accurate temperature at the flare on May 27th-29th. During these periods, operating personnel documented and verified operational parameters were maintained. The flare is programed to shutdown anytime the flare temperature drops below 1499°F for more than 45 minutes. As such there were no periods lasting 3 hours or more when the flare operated below 1499°F.

§60.756(d)

(d) Each owner or operator seeking to demonstrate compliance with §60.752(b)(2)(iii) using a device other than an open flare or an enclosed combustor shall provide information satisfactory to the Administrator as provided in §60.752(b)(2)(i)(B) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Administrator shall review the information and either approve it, or request that additional information be submitted. The Administrator may specify additional appropriate monitoring procedures.

The Blue Ridge Landfill owns and operates the landfill gas processing facility that treats and processes the collected gas for subsequent sale or use. EPA has determined that landfill gas recovery systems which consist of filtration, de-watering, and compression, are considered to be treatment systems for the purposes of 60.752(b)(2)(iii). The landfill gas processing facility includes filtration, de-watering and compression, and as such meets the definition of a control device. There are no atmospheric vents in the landfill gas processing facility.

§60.757(f)(2)

Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.

The gas stream was not diverted from the control devices through bypass lines and there is no indication of bypass flow. LFG flow continued to be directed to the energy facility and/or the flares; therefore, §60.757(f)(2) is not applicable.

§60.757(f)(3)

Description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not operating.

The flares at the landfill were operated when the LFG was either partially or totally diverted from the energy facility. When the flares are shut down, the fail-safe valve closes to prevent the raw landfill gas from venting into the atmosphere. As specified in the Design Plan, only control device downtimes that result in venting of uncombusted landfill gas will be reported in the NSPS reports. No such events occurred during this reporting period.

§60.757(f)(4)

All periods when the collection system was not operating in excess of 5 days.

During this reporting period, there were no instances when the GCCS was not operating in excess of five days.

§60.757(f)(5)

The location of each exceedance of the 500 parts per million methane concentration as provided in §60.753(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.

Quarterly NSPS surface emissions monitoring (SEM) was performed at the landfill by Tetra Tech. The results from the SEM for the Fourth Quarter of 2017, and the First and Second Quarters of 2018 indicate that methane emissions at the landfill surface which exceeded the NSPS threshold of 500 ppm or greater above background were remediated and rechecked as required by the NSPS. All areas achieved NSPS compliance. The quarterly SEM Reports are provided in Appendix B.

§60.757(f)(6)

The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), and (c)(4) of §60.755.

During this reporting period, the GCCS was expanded by installing twenty-four new extraction wells/collectors and eleven extraction wells were abandoned and re-drilled. In addition, two wells/collectors were abandoned. The new and re-drilled extraction wells/collectors and the associated piping are contributing to the performance of the GCCS. The landfill continues to have sufficient well density in compliance with the NSPS. Appendix C contains an updated site layout showing the approximate locations of the new and re-drilled wells, and a table with the

installation dates. The site layout is being submitted as an update to the site's Design Plan as Drawing A-11.

§60.758(c)(1)(i)

(i) For enclosed combustors except for boilers and process heaters with design heat input capacity of 44 megawatts (150 million British thermal unit per hour) or greater, all 3-hour periods of operation during which the average combustion temperature was more than 28°C below the average combustion temperature during the most recent performance test at which compliance with §60.752(b)(2)(iii) was determined.

During the performance test of the enclosed flare, the average operating stack combustion temperature was 1,548.9°F. For future operations in response to this performance test, all periods longer than (3) hours must be recorded and reported where the operation temperature is more than 28°C below the average operating temperature recorded during the performance test, which is equivalent to 1,499°F. There were no such events during this reporting period.

Due to a malfunction of a thermocouple, the data recorder did not record an accurate temperature at the flare on May 27th-29th. During these periods, operating personnel documented and verified operational parameters were maintained. The flare is programed to shutdown anytime the flare temperature drops below 1499°F for more than 45 minutes. As such there were no periods lasting 3 hours or more when the flare operated below 1499°F.

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 8
Page 10 of 12

3 NESHAP MACT REQUIREMENTS

SSM event records are maintained in accordance with Title 40 CFR §63.1980(a) and (b). The primary location for records storage is the Blue Ridge Landfill facility.

The following summarizes the requirements of §63.1960 and §63.1965(a) and (b), which consist of SSM plan provisions.

§63.1960

Compliance is determined in the same way it is determined for Title 40 CFR part 60, subpart WWW, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence. In addition, continuous parameter monitoring data, collected under Title 40 CFR 60.756(b)(1), (c)(1), and (d) of subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation occurs, you have failed to meet the control device operating conditions described in this subpart and have deviated from the requirements of this subpart. Finally, you must develop and implement a written SSM plan according to the provisions in Title 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site. Failure to write, implement, or maintain a copy of the SSM plan is a deviation from the requirements of this subpart.

The SSM plan was developed and implemented at the Blue Ridge Landfill. The SSM plan and event records are maintained at the site. A copy of the SSM Report for this reporting period is provided in Appendix E.

§63.1965(a)

A deviation occurs when the control device operating parameter boundaries described in 40 CFR 60.758(c)(1) of subpart WWW are exceeded.

There were no deviations as described above during this reporting period.

Due to a malfunction of a thermocouple, the data recorder did not record an accurate temperature at the flare on May 27th-29th. During these periods, operating personnel documented and verified operational parameters were maintained. The flare is programed to shutdown anytime the flare temperature drops below 1499°F for more than 45 minutes. As such there were no periods lasting 3 hours or more when the flare operated below 1499°F.

§63.1965(b)

A deviation occurs when 1 hour or more of the hours during the 3-hour block averaging period does not constitute a valid hour of data. A valid hour of data must have measured values for at least three 15-minute monitoring periods within the hour.

There were no deviations as described above during this reporting period.

Investigation Type: SPC I
Air Account NO: FG-0536-E
Attachment: 8
Page 12 of 12

Attachment 9

BRL response to 8/14/18 records request Enclosed Flare Data

Blue Ridge Landfill

Blue Ridge Landfill TX LP

RN # 102610102

CN # 602820599

Permit # O-01472

06/24/2019

Pages 2

David Broussard

From: Kubinski, Amy <AKubinski@republicservices.com>
Sent: Tuesday, August 20, 2019 4:45 PM
To: David Broussard
Cc: Telepak, Timothy; Vandergriff, Angie
Subject: RE: Blue Ridge Landfill Flare Emissions

Investigation Type: SPC I
Air Account NO: EG-0536-E
Attachment: 9
Page 1 **of** 2

Mr. Broussard,

Per your email request on August 14, please see the comments in blue below.

- Provide speciated emissions data for the following units during the listed times in 1-hour increments.

Enclosed Flare (EPN: FLARE2011)

5/25/18 at 00:00 5/28/18 to at 23:00 - *> than three hours and reported in NSPS report. Was not reported as a deviation as the site provided SSM information stating the thermocouple was inaccurately reading the temperature and site personnel had verified above required temperatures at the flare.*

10/26/18 from 11:00 to 10/27/18 at 01:00 *< than three hours - nothing has been reported*

11/1/18 from 08:00 to 12:00 *< than three hours - nothing has been reported*

South Flare (EPN: FLARE-T)

10/27/18 from 01:00 to 06:00 - *Flare down - zero emissions (the data shows small amounts of flow and ambient temperature but we have SSM info from the site -previously submitted to TCEQ.)*

10/31/18 from 16:00 to 23:00 - *Flare down - zero emissions (the data shows small amounts of flow and ambient temperature but we have SSM info from the site - previously submitted to TCEQ.)*

11/1/18 from 11:00 to 21:00 - *Flare down - zero emissions (the data shows small amounts of flow and ambient temperature but we have SSM info from the site)*

- Provide a reason for each instance of low temperatures as well as what was done to resolve the issue.

Please let me know if you have any questions.

Thank you,

Amy Kubinski
Environmental Specialist

USPS: P.O. Box 879, Fresno, TX 77545
Overnight Pkgs: 2200 FM 521, Fresno, TX 77545
e akubinski@republicservices.com
o 281-668-9745 c 346-269-2946
f 281-835-6146 w RepublicServices.com



We'll handle it from here.

Investigation Type: SPCI
Air Account No: EG-0536-E
Attachment: 9
Page 2 of 2

From: David Broussard <David.Broussard@tceq.texas.gov>
Sent: Wednesday, August 14, 2019 1:32 PM
To: Kubinski, Amy <AKubinski@republicservices.com>; Telepak, Timothy <TTelepak@republicservices.com>
Cc: avandergriff@wcgrp.com
Subject: Blue Ridge Landfill Flare Emissions

Note that (David.Broussard@tceq.texas.gov) is an external email. Report suspicious emails by clicking on "Report Phishing", or forward to "infosec.phishing@republicservices.com"

Mr. Telepak and Ms. Kabinski,

- Provide speciated emissions data for the following units during the listed times in 1-hour increments.

Enclosed Flare (EPN: FLARE2011)

5/25/18 at 00:00 5/28/18 to at 23:00
10/26/18 from 11:00 to 10/27/18 at 01:00
11/1/18 from 08:00 to 12:00

South Flare (EPN: FLARE-T)

10/27/18 from 01:00 to 06:00
10/31/18 from 16:00 to 23:00
11/1/18 from 11:00 to 21:00

- Provide a reason for each instance of low temperatures as well as what was done to resolve the issue.

Thanks,
David Broussard
Environmental Investigator
TCEQ Region 12 – Houston
5425 Polk Street, Suite H
Houston, Texas 77023
Phone: 713-767-3630
Email: David.Broussard@tceq.texas.gov

Attachment 10
Exit Interview Form
Blue Ridge Landfill
Blue Ridge Landfill TX LP
RN # 102610102
CN # 602820599
Permit # O-01472
06/24/2019
Pages 2

EXIT INTERVIEW FORM: Potential Violations and/or Records Requested					
Regulated Entity/Site Name	Blue Ridge Landfill		TCEQ Add. ID No. RN No (optional)	102610102 FG-0536-E	
Investigation Type	SPCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Compliance Investigation
Regulated Entity Contact	Ms. Amy Kubinski		Telephone No.	281-668-9745	Date Contacted
Title	Environmental Specialist		E-mail:		Date Faxed:

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

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.			
No.	Type ¹	Rule Citation (if known)	Description of Issue		
1	AV	122.145 (2)(A)	Failure to report all instances of deviations in the deviation report covering 12/5/17 through 6/4/18.		
2	AV	122.145 (2)(A)	Failure to report all instances of deviations in the deviation report covering 6/5/18 through 12/4/18.		
3	AV	60.757 (f)(3)	Failure report all instances of improper flare operation.		
4	AV	60.18 (c)(2)	Failure to operate the south flare (EPN: FLARE-T) with a flame present at all times.		
5	AV	122.144 (4)	Failure to provide requested emissions data for the enclosed flare.		
6	AV	122.144 (4)	Failure to provide requested emissions data for the South Flare.		
7	AV	60.18 (f)(2)	Failure to monitor the presence of a pilot flame at all times.		
8					
9					
10					
11					
12					
13					
14					

Investigation Type: SRC I
 Air Account NO: FG-0536-E
 Attachment: 10
 Page 1 of 2

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)
Did the TCEQ document the regulated entity named above operating without proper authorization?

☐ No ☐ Yes

Did the investigator advise the regulated entity representative that continued operation is not authorized?

☐ No ☐ Yes

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

David Broussard



8/30/14 Amy Kubinski

Investigator Name (Signed & Printed)

Date

Regulated Entity Representative Name (Signed & Printed)

Date

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

Investigation Type: SPC I

Air Account NO: FG-0536-E

Attachment: 10

Page 2 of 2

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 30, 2019

CERTIFIED MAIL #91 7199 9991 7038 7436 5038
RETURN RECEIPT REQUESTED

Mr. Timothy Telepak, Environmental Manager
Blue Ridge Landfill
2200 FM 521 Rd
Fresno, Texas 77545

Re: Notice of Violation for Compliance Evaluation Investigation at:
Blue Ridge Landfill, 2200 Farm to Market 521, Fresno (Fort Bend County), Texas
Regulated Entity No.: 102610102, TCEQ ID No.: FG-0536-E, FOP No.: O-1472,
Investigation No.: 1589589

Dear Mr. Telepak:

On 6/24/19 through 6/25/19, Mr. David Broussard of the Texas Commission on Environmental Quality (TCEQ) Houston Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable air quality requirements. Enclosed is a summary which lists the investigation findings. During the investigation, outstanding alleged violations were identified for which compliance documentation is required. Please submit to this office by September 30, 2019 a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations (Violation Tracking Numbers 723935, 723970, 723976, 723978, 723983, 724029, and 726471).

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled Obtaining TCEQ Rules (GI 032) are located on our agency website at <http://www.tceq.texas.gov> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Houston Region Office at (713) 767-3700 or the Central Office Publications Ordering Team at 512-239-0028. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violations documented in this notice. Should you choose to do so, you must notify me at 713-767-3564, in the Houston Region Office, within 10 days from the date of this letter.

TCEQ Region 12 • 5425 Polk St., Ste. H • Houston, Texas 77023-1452 • 713-767-3500 • Fax 713-767-3520

Austin Headquarters: 512-239-1000 • tceq.texas.gov • How is our customer service? tceq.texas.gov/customersurvey
printed on recycled paper

August 30, 2019

At that time, I will schedule a violation review meeting to be conducted within 21 days from the date of this letter. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Mr. Broussard in the Houston Region Office at (713) 767-3630.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Horton".

Chris Horton, Team Leader
Houston Region Office
Texas Commission on Environmental Quality

CH/DB/cj

cc: Amy Kubinski, Environmental Specialist, Blue Ridge Landfill, 2200 FM 512
Fresno, TX 77545

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

BLUE RIDGE LANDFILL

2200 FM 521 RD

FRESNO, FORT BEND COUNTY, TX 77545

Investigation #

1589589

Investigation Date: 06/24/2019

Additional ID(s): FG0536E
1472

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 723935 Compliance Due Date: 09/30/2019

30 TAC Chapter 122.143(4)

30 TAC Chapter 122.145(2)(A)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(3)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

Failure to report all instances of deviations in the deviation report for the 12/5/17 through 6/4/18 reporting period.

During the course of the records review conducted on 6/24/19 through 6/25/19, it was discovered that BRL reported 2 deviations during this time period. Two unreported deviations were discovered to have had occurred at the Blue Ridge Landfill and are listed below:

- A. Failure to operate the Enclosed Flare (EPN: FLARE2011) within the parameters established in the most recent performance test.
- B. Failure to monitor the pilot flame of the rental utility flare (EPN: S3UFLARE1).

These issues should have been reported in the deviation report covering the 12/5/17 through 6/4/18 reporting period. This constitutes a violation of 30 Texas Administrative Code 122.145 (2)(A), which states "The permit holder shall report, in writing, to the executive director all instances of deviations, the probable cause of the deviations, and any corrective actions or preventative measures taken for each emission unit addressed in the permit."

This further constitutes a violation of General Operating Permit Term (b) (3); 30 TAC 122.143 (4), and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track No: 723970 Compliance Due Date: 09/30/2019

30 TAC Chapter 122.143(4)

30 TAC Chapter 122.145(2)(A)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(3)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

Failure to report all instances of deviations in the deviation report for the 6/5/18 through 12/4/18 reporting period.

During the course of the records review conducted on 6/24/19 through 6/25/19, it was discovered that BRL reported 2 deviations in the deviation report for the 6/5/18 through 12/4/18 reporting period. During this time period 7 instances of unreported deviations were discovered to have had occurred at the Blue Ridge Landfill as follows:

- A. Failure to operate the Enclosed Flare (EPN: FLARE2011) within the parameters established in the most recent performance test (3 occasions).
- B. Venting landfill gas to South Flare (EPN: FLARE-T) while it was unlit (3 occasions).
- C. Failure to monitor the pilot flame of the Rental Utility Flare (EPN: S3UFLARE1).

These issues should have been reported in the deviation report covering 6/5/18 through 12/4/18. This constitutes a violation of 30 Texas Administrative Code 122.145 (2)(A), which states "The permit holder shall report, in writing, to the executive director all instances of deviations, the probable cause of the deviations, and any corrective actions or preventative measures taken for each emission unit addressed in the permit."

This further constitutes a violation of General Operating Permit Term (b) (3); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track No: 723976

Compliance Due Date: 09/30/2019

30 TAC Chapter 122.143(4)

40 CFR Chapter 60.757(f)(3)

40 CFR Chapter 60.758(c)(1)(i)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)

PERMIT 1472, General Operating Permit Term (b)(6)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

Failure report all instances of improper flare operation.

During the course of the investigation conducted 6/24/19 through 6/25/19, it was discovered that on three occasions the South Flare (EPN: FLARE-T) was not operational for at least 1 hour and this was not reported in the annual NSPS report dated December 2018. Each occasion is listed below.

A. During the period from 02:33 AM to 04:23 AM on 10/27/18 the flare had landfill gas being routed to it without a flame present. In that time period the thermocouple temperature fell to approximately 121 degrees Fahrenheit (F) on average. Additionally, according to gas flow data provided by Blue Ridge Landfill approximately 8,491.3 standard cubic feet of landfill gas went directly to atmosphere.

B. During the period between 6:00 PM and 9:10 PM on 10/31/18 the flare had landfill gas being routed to it without a flame present. In that time period the thermocouple temperature fell to approximately 75 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station. Additionally, according to gas flow data provided by Blue Ridge Landfill approximately 28,182.5 standard cubic feet of landfill gas went directly to atmosphere.

C. During the period between 12:43 PM and 6:24 PM on 11/1/18 the flare had landfill gas being routed to it without a flame present. In that time period the thermocouple temperature fell to approximately 66 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station. Additionally, according to gas flow data provided by Blue Ridge Landfill approximately 142,358.8 standard cubic feet of landfill gas went directly to atmosphere.

During the course of the investigation conducted 6/24/19 through 6/25/19, it was discovered that on three occasions the Enclosed Flare (EPN: FLARE2011) was not operated within the parameters set in the most recent performance test and this was not reported in the annual NSPS report dated December 2018.

D. On 5/28/18 from 12:09 AM to 11:00 PM the flare failed to achieve the 1548 degrees Fahrenheit (F) minimum temperature established in the most recent performance test. The greatest average temperature recorded during this period was from 10:00 to 11:00. All 3-hour

periods except 10:00 to 12:00 should have been reported as these periods had an average temperature below 1499 F. The lowest 3-hour average occurred between the 04:00 to 06:00 periods when the average temperature fell to 1053.52 F.

E. On 10/26/18 from 12:00 AM to 9:43 PM the flare failed to achieve the 1548 F minimum temperature established in the most recent performance test. All 3-hour periods should have been reported as these periods had an average temperature below 1499 F. The lowest 3-hour average occurred between the 13:00 to 15:00 periods when the average temperature fell to 431.1 F.

F. On 11/1/18 from 09:04 AM to 12:04 PM the flare failed to achieve the 1548 F minimum temperature established in the most recent performance test. This period from should have been reported as this period had an average temperature below 1499 F. The 3-hour average temperature fell to 1457.01 F.

This constitutes a violation of 40 Code of Federal Regulations (CFR) 60.757 (f)(3), which states "Each owner or operator of a landfill seeking to comply with § 60.752(b)(2) using an active collection system designed in accordance with § 60.752(b)(2)(ii) shall submit to the Administrator annual reports of the recorded information in (f)(1) through (f)(6) of this paragraph... For enclosed combustion devices and flares, reportable exceedances are defined under § 60.758(c)... Description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not... This also constitutes a violation of 40 Code of Federal Regulations (CFR) 60.758 (c)(1)(i), which states " The following constitute exceedances that shall be recorded and reported under § 60.757(f): (i) For enclosed combustors except for boilers and process heaters with design heat input capacity of 44 megawatts (150 million British thermal unit per hour) or greater, all 3-hour periods of operation during which the average combustion temperature was more than 28 oC below the average combustion temperature during the most recent performance test at which compliance with § 60.752(b)(2)(iii) was determined."

This further constitutes a violation of General Operating Permit (GOP) Term (b) (2), and GOP Term (b)(6); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).operating."

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track No: 723978 Compliance Due Date: 09/30/2019

30 TAC Chapter 101.221(a)
30 TAC Chapter 122.143(4)
40 CFR Chapter 60.18(c)(2)
5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(43)(H)

PERMIT 1472, General Operating Permit Term (b)(8)(F)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/30/2019

Failure to operate the south flare (EPN: FLARE-T) with a flame present at all times.

During the course of investigation conducted on 6/24/19 through 6/25/19, it was discovered that Blue Ridge Landfill operated the south flare without a flame present on three occasions as listed below:

A. The south flare vented directly to atmosphere, with no flame present on 10/27/18 from 02:33 AM to 04:23 AM. During that timeframe the unit emitted approximately 8491.3 Standard Cubic Feet (SCF) of landfill gas to the atmosphere. In that time period the thermocouple temperature fell to an average temperature of 121 degrees Fahrenheit (F).

B. The south flare vented directly to atmosphere, with no flame present on 10/31/18 from 6:00 PM to 9:10 PM. During that timeframe the unit emitted approximately 28,182 SCF of landfill gas. In that time period the thermocouple temperature fell to approximately 75 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station.

C. The south flare vented directly to atmosphere, with no flame present, on 11/1/18 from 3:33 PM to 6:24 PM. During that timeframe the unit emitted approximately 143,173 SCF of landfill gas to the atmosphere. In that time period the thermocouple temperature fell to approximately 66 degrees Fahrenheit (F), which was the ambient temperature for the area at that time according to Manvel Croix park CAMS station.

This constitutes a violation of 40 Code of Federal Regulations 60.18 (c)(2), which states "Flares shall be operated with a flame present at all times..."

Additionally, this constitutes a violation of 30 Texas Administrative Code 101.221(a), which states "All pollution emission capture equipment and abatement equipment must be maintained in good working order and operated properly during facility operations. Emission capture and abatement equipment must be considered to be in good working order and operated properly when operated in a manner such that each facility is operating within authorized emission limitations."

This further constitutes a violation of General Operating Permit Term (b)(8)(F), and (b)(43)(H); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track No: 723983 Compliance Due Date: 09/30/2019

30 TAC Chapter 116.615(8)

30 TAC Chapter 122.143(4)

30 TAC Chapter 122.144(4)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)

Alleged Violation:

Investigation: 1589589

Comment Date: 08/29/2019

Failure to provide requested emissions data for the enclosed flare.

On 8/14/19 a records request was submitted to Blue Ridge Landfill requesting specific emissions data from the enclosed flare (FPN FI ARE2011) for the following dates and times:

A. 5/25/18 at 00:00 AM to 5/28/18 at 11:00 PM

B. 10/26/18 from 11:00 AM to 10/27/18 at 01:00 PM

C. 11/1/18 from 08:00 AM to 12:00 PM.

Blue Ridge Landfill did not provide the requested emissions data for the dates and times above. This constitutes a violation of 30 Texas Administrative Code (TAC) 122.144 (4), which states "Records required by the permit, including confidential information, shall be provided, upon request, in a legible form, to representatives from the commission or the local air pollution control program having jurisdiction within a reasonable period of time."

Additionally, this constitutes a violation of 30 TAC 116.615 (8), which states "A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the United States Environmental Protection Agency, or any air pollution control agency having jurisdiction."

This further constitutes a violation of General Operating Permit Term (b)(2); 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track No: 724029 Compliance Due Date: 09/30/2019

30 TAC Chapter 116.615(8)

30 TAC Chapter 122.143(4)

30 TAC Chapter 122.144(4)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)**Alleged Violation:**

Investigation: 1589589

Comment Date: 08/29/2019

Failure to provide requested emissions data for the South Flare.

On 8/14/19 a records request was sent to Blue Ridge Landfill requesting specific emissions data from the south flare (EPN: FLARE-T) for the following dates and times:

A. 10/27/18 from 01:00 AM to 06:00 AM

B. 10/31/18 from 4:00 PM to 11:00 PM

C. 11/1/18 from 11:00 AM to 9:00 PM

Blue Ridge Landfill indicated that there were no emissions from the south flare during these times; however, the facility's records indicate there was flow to the flare. The requested emissions data was not provided. This constitutes a violation of 30 Texas Administrative Code (TAC) 122.144 (4), which states "Records required by the permit, including confidential information, shall be provided, upon request, in a legible form, to representatives from the commission or the local air pollution control program having jurisdiction within a reasonable period of time."

Additionally, this constitutes a violation of 30 TAC 116.615 (8), which states "A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the United States Environmental Protection Agency, or any air pollution control agency having jurisdiction."

This further constitutes a violation of General Operating Permit Term (b)(2), 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b)

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

Track No: 726471

Compliance Due Date: 09/30/2019

30 TAC Chapter 122.143(4)

40 CFR Chapter 60.18(f)(2)

5C THSC Chapter 382.085(b)

PERMIT 1472, General Operating Permit Term (b)(2)**Alleged Violation:**

Investigation: 1589589

Comment Date: 08/30/2019

Failure to monitor the presence of a flame at all times.

During the course of investigation, it was discovered that on three occasions BRL failed to monitor the presence of a flame on the rental utility flare (EPN: S3UFLARE1) as the thermocouple was not functioning properly. These instances occurred on 7/24/18 to 7/31/18 and on 11/15/18. This constitutes a violation of 60.18 (f)(2), which states "The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame."

This further constitutes a violation of General Operating Permit Term (b)(2), 30 TAC 122.143 (4); and Texas Health and Safety Code 382.085 (b).

Recommended Corrective Action: Submit a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for this outstanding alleged violation.

