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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 # 1471634	Incident Numbers
Investigator: ROLAND RODRIGUEZ	Site Classification MAJOR SOURCE
Conducted: 02/15/2018 -- 02/15/2018	NAIC Code: 562212 NAIC Code: 486210 SIC Code: 4922 SIC Code: 4953 SIC Code: 1521
Program(s): AIR OPERATING PERMITS AIR NEW SOURCE PERMITS	
Investigation Type: Site Assessment File Review	Location: LOCATED ON 2200 FM 521
Additional ID(s): 1472 81004 FG0536E	

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

Local Unit: REGION 12 - HOUSTON
Activity Type(s): PRESIH - AIR PRESIH - IN HOUSE
PRETEST MEETING

Principal(s):

Role	Name
RESPONDENT	BLUE RIDGE LANDFILL TX LP

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	SENIOR PROJECT MANAGER	MS ANGIE VANDERGRIF	Work (817) 735-9770

Other Staff Member(s):

Role	Name
Investigator	TIMOTHY BATSCHE
QA Reviewer	TIMOTHY BATSCHE
Supervisor	MARK KOLKMEIER
Investigator	CHARLOTTE CISNEROS

Associated Check List

<u>Checklist Name</u> AIR GENERIC INVESTIGATION (10 ITEMS)	<u>Unit Name</u> S3UFLARE1
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Investigation Comments:

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MAY 29 2018

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CENTRAL FILE ROOM

INTRODUCTION/ INVESTIGATION SUMMARY

Introduction

The Texas Commission on Environmental Quality (TCEQ), Houston Region Office, conducted a pretest meeting in response to a performance test notification/test protocol (#4247) submitted by Weaver Consultants Group (WCG) on behalf of Blue Ridge Landfill TX, LP on January 12, 2018. The purpose of this investigation (Investigation Typecode PRES) is to determine compliance with applicable performance test method and protocol.

Daily Narrative

A pretest meeting was conducted via teleconference February 15, 2018. The following participated in the meeting:

- 1) Mr. Roland I. Rodriguez, Environmental Investigator, TCEQ
- 2) Mr. Timothy Batsche, Environmental Investigator, TCEQ
- 3) Ms. Charlotte Cisneros, Environmental Investigator, TCEQ
- 4) Mr. Mark Kolkmeier, Team Leader, TCEQ
- 3) Ms. Angie Vandergriff, Senior Project Manager, Weaver Consultants Group, LLC
- 4) Ms. Archie Nagaraj, Senior Project Manager, Weaver Consultants Group, LLC
- 5) Mr. Matt Stutz, P.E., Senior Engineer – Principal, Weaver Consultants Group, LLC

As Blue Ridge Landfill accepts more waste and continues to generate more landfill gas, the gas collection and control system is also expanded. The utility flare to be tested by WCG is part of this expansion.

To determine the net heating value of the gas, WCG will use Method 3C as an alternative to Method 18 as allowed by 40 Code of Federal Regulations (CFR) 60 Subpart WWW. This method allows for the collection of landfill gas into canisters to be sent for off-site testing.

To determine the actual exit gas velocity of the flare tip, WCG will use a flow meter as an alternative to Method 2, 2A, 2C, or 2D. This alternative has been previously approved by the United States Environmental Protection Agency (USEPA). See USEPA Alternative Test Method ALT-100.

The company was informed that any alternative method or change must be approved prior to the sampling date. Changes that have not been approved prior to the sampling date could result in the company conducting a retest. The company was also informed that if operating rates used during the tests are less than 90% of design, a retest at higher rates might be required for operation at higher rates in the future.

Exit Interview

The pretest meeting ended on February 15, 2018. The company was advised that the responsibility for understanding and complying with the sampling and reporting requirements of the regulation requiring this test is theirs. The pretest meeting is not a seminar on source sampling or the appropriate forum for introducing requests for significant alterations to the sampling methods. The TCEQ sampling methods are published in the "Sampling Procedures Manual", available from the Quality Assurance Division. The EPA sampling methods are found in the Code of Federal Regulations 40 CFR 60.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

Blue Ridge Landfill is a solid waste collection facility. Details of process description can be found at the Houston Region Central files.

BACKGROUND

Current Enforcement Actions, Agreed Orders, Court Orders, and Other Compliance Agreements, Prior Enforcement Issues

These are not reviewed for this type of investigation.

ADDITIONAL INFORMATION

BLUE RIDGE LANDFILL - FRESNO

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Source Name: Landfill Gas Utility Flare
EPN: S3UFLARE1

Testing Required by: 40 CFR Subpart WWW

Initial Compliance Test: Yes

If Initial, Unit Start-Up Date: 10/2/17

Test Deadline: 3/31/18

Proposed Test Date(s): 2/16/18

Sampling Consultant Contact, Sampling Company: Angie Vandergriff, Weaver Consultants Group

Facility Contact: Burgess Stengl, Environmental Manager, Blue Ridge Landfill

II. SAMPLING INFORMATION:

General Information

1) Who will conduct opacity observations during sampling period if required?

N/A

2) What type of safety protection/precautions are required at site and to observe the testing?

Hard Hat, Safety Vest

3) Will Observer be required to attend company safety training and how long will the training take?

No

4) Was a summary of the report format discussed in chapter 14 of the TCEQ Sampling manual given to the company?

No

5) Was the TCEQ confidentiality policy discussed?

No

Test Methodology

Sample location: 1-2 ports

Port height above ground: 1-3 ft.

Sample location accessible: yes

Number of ports to be utilized: 1-2

Diameter of stack/duct to be sampled: 10 in.

Port location upstream and downstream: Prior to flare

Number of sampling points: N/A

Number of test runs: 4 six-minute runs

Number of sample conditions: N/A

Location of sample analysis: Air Technology Laboratories, 18501 E. Gale Ave. Suite 130, City of Industry, CA 91748

III. SUMMARY OF SAMPLING METHODS:

Visible Emissions: Method 22

Net Heating Value: Method 3C (Alternative to Method 18 per 40 CFR Subpart WWW)

Exit Gas Velocity: Flow Meter in lieu of Method 2, 2A, 2C, 2D

IV. PROCESS DATA:

Proposed operating rate of unit during testing: 2,000 standard cubic feet per minute (scfm)

Design maximum operating rate of unit: 2,100 scfm

Normal operating rate of unit: 2,000 scfm

List control devices to be operated during test: N/A

Indicate who will monitor and record process parameters required to be monitored: Angie Vandergriff, Weaver Consultants Group

Summary of Process Data to be Collected

Process parameter to be monitored: Visible Emissions
Method of monitoring: Method 22
Approximate range of operation: 0 – 100% opacity

Process parameter to be monitored: Net heating value
Method of monitoring: Method 3C
Approximate range of operation: 2,000 scfm

Process parameter to be monitored: Exit gas velocity
Method of monitoring: Flow meter
Approximate Range of Operation: <18.3 m/s

Conclusion and Recommendations

Based on information submitted by Weaver Consultants Group on behalf of Blue Ridge Landfill, the test protocol/sampling methods deviations presented by the Weaver Consultants Group were determined acceptable. The proposed test is in compliance with the applicable compliance test sampling requirements.

Additional Issues

There were no additional issues.

Report Attachments

None.

No Violations Associated to this Investigation

Signed



Environmental Investigator

Date

4/11/18

Signed



Supervisor

Date

4/30/18

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) :
