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AIR CP_102610102_CP_20180216_INVESTIGATION_1472801_
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 # 1472801
Investigator: ROLAND RODRIGUEZ
Conducted: 02/16/2018 -- 02/28/2018

Incident Numbers
Site Classification MAJOR SOURCE
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

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): OBPT - AIR OBPT - OBSERVE STACK
PERFORMANCE TEST

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 | CHARLOTTE CISNEROS |
| Supervisor | MARK KOLKMEIER |
| QA Reviewer | TIMOTHY BATSCH |
| Investigator | TIMOTHY BATSCH |

Associated Check List

| <u>Checklist Name</u> | <u>Unit Name</u> |
|--------------------------------------|-------------------------|
| AIR GENERIC INVESTIGATION (10 ITEMS) | S3UFLARE1 |

Investigation Comments:

RECEIVED

MAY 29 2018

TCEQ
CENTRAL FILE ROOM

INTRODUCTION/ INVESTIGATION SUMMARY

Introduction

The Texas Commission on Environmental Quality (TCEQ), Houston Region Office, conducted a stack test observation in response to a stack test notification (#4247) submitted on January 11, 2018 by Weaver Consultants Group (WCG) on behalf of Blue Ridge Landfill TX, LP (Blue Ridge). The purpose of this investigation (Investigation Typecode OBPT) is to determine compliance with applicable stack test methods and protocols.

Daily Narrative

The investigators arrived at the test site at 7:10am on February 16, 2018. The weather conditions at the time of the observation was overcast with calm winds. The temperature was 68.5° Fahrenheit. Meteorological conditions were obtained from wunderground.com, station KTXROSHA14, located at 29.554 °N, 95.436 °W. The following participated in the test observation:

- 1) Roland I. Rodriguez, Environmental Investigator, TCEQ
- 2) Timothy Batsche, Environmental Investigator, TCEQ
- 3) Charlotte Cisneros, Environmental Investigator, TCEQ
- 4) Burgess Stengl, Environmental Manager, Blue Ridge Landfill
- 5) Angie Vandergriff, Senior Project Manager, Weaver Consultants Group, LLC

There were no confidential claims made during the stack test.

The stack test was conducted by WCG on behalf of Blue Ridge, fulfilling the sampling requirements found in 40 Code of Federal Regulations §60.8.

Ms. Vandergriff was observed collecting grab samples of flare gas utilizing 6-Liter, pre-evacuated steel Summa canisters. Below are test runs, times, and conditions observed:

Test Runs Observed: 2

Time of Runs Observed: 7:32-7:40, 7:42-7:50

Test Condition Observed: ~82% of Maximum

Ms. Vandergriff was also observed performing a visible emissions observation per United States Environmental Protection Agency (USEPA) Method 22. Below are test runs, times, and conditions observed:

Test Runs Observed: 3

Time of Runs Observed: 7:57-8:17, 8:27-8:47, 8:57-9:17

Test Condition Observed: ~82% of Maximum

Investigators left the facility at approximately 9:25 a.m.

Exit Interview

There was no exit interview conducted.

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

There were no violations found as a result of the investigation.

Agreed Orders, Court Orders, and Other Compliance Agreements

These are not reviewed when no violations resulted from the investigation.

Prior Enforcement Issues

These are not reviewed when no violations resulted from the investigation.

ADDITIONAL INFORMATION

Source Tested: Landfill Gas Utility Flare
EPN: S3UFLARE1

Name of Testing Organization: Weaver Consultants Group LLC
Notification Date: January 11, 2018
Test Date: February 16, 2018

SAMPLING INFORMATION:

Pollutants Sampled and Test Methods used:

Visible Emissions: Method 22

Net Heating Value: Method 3C (Alternative to Method 18 as allowed by 40 CFR 60 Subpart WWW)

Exit Gas Velocity: Flow Meter in lieu of Method 2, 2A, 2C, 2D (See USEPA Alternative Test Method ALT-100)

- 1) There were no deviations from the test method and/or test protocol witnessed during the test run observed.
- 2) There were unusual situations witnessed that might tend to bias the data obtained during the test run observed. The first two twenty-minute visible emissions observations were done with the sun to the observer's face. The observer relocated before the third twenty-minute observation with the sun positioned to the observer's back. Positioning relative to lighting is not regulated by Method 22, however it is suggested the observer be trained and knowledgeable on the effects of positioning.

Process parameter to be monitored: Net heating value
Method of monitoring: Method 3C
Approximate range of operation: 2,000 standard cubic feet per minute (scfm)
Actual range of operation: ~1750 scfm

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

- 1) There were no deviations from the process monitoring procedures which were either submitted in the sample protocol or agreed to in the pretest meeting.

Conclusion and Recommendations

There were no sample collection errors and/or deviations detected during the observation which would invalidate the test conducted for Blue Ridge. The stack test was in compliance with the applicable stack test sampling requirements.

Additional Issues

Investigators were informed that the flare observed is for temporary usage. The flare will not be operated in conjunction with any additional new flare(s), as previously presented in Scenario 3 of Standard Permit Registration Number 81004. Existing flares, EPNs FLARE-T and FLARE2011, will continue to operate in the same range as before installation of the new Utility Flare.

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) : _____
- _____
- _____