

0000-0000-0033-9185

Document Control Sheet

Sheet Title:	AIR CP - OLS
Box ID:	9913
Control Sheet ID:	0000-0000-0033-9185
Record Series Name:	OCE / Air Compliance
Record Series:	AIR CP
Primary ID:	102610102
Secondary ID:	
Doc Type:	Compliance
Security:	Public
Date:	3/21/2019 12:00AM
Title:	Investigation
Tertiary ID	1553915

AIR CP\_102610102\_CP\_20190321\_INVESTIGATION\_1553915\_  
**Texas Commission on Environmental Quality**  
**Investigation Report**

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

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

---

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

**Investigation #** 1553915

**Investigator:** CORBIN HENNICK

**Conducted:** 03/21/2019 -- 04/01/2019

**Program(s):** AIR OPERATING PERMITS

**Investigation Type:** Site Assessment

**Additional ID(s):** FG0536E  
1472

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

**Incident Numbers**

**Site Classification** MAJOR SOURCE

**NAIC Code:** 562212

**NAIC Code:** 486210

**SIC Code:** 4922

**SIC Code:** 4953

**SIC Code:** 1521

**Location:** LOCATED ON 2200 FM 521

**Local Unit:** REGION 12 - HOUSTON

**Activity Type(s):** PRESON - AIR PRESON - ON SITE  
PRETEST MEETING

**Principal(s):**

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

**Contact(s):**

<b>Role</b>	<b>Title</b>	<b>Name</b>	<b>Phone</b>
REGULATED ENTITY CONTACT	ENVIRONMENTAL SPECIALIST	MR CHANCE SEELY	Phone (281) 835-6142

**Other Staff Member(s):**

<b>Role</b>	<b>Name</b>
QA Reviewer	ANDREW EVANS
Supervisor	MARK KOLKMEIER

**Associated Check List**

<b><u>Checklist Name</u></b>	<b><u>Unit Name</u></b>
AIR GENERIC INVESTIGATION (10 ITEMS)	UFLARE1

**Investigation Comments:**

INTRODUCTION/ INVESTIGATION SUMMARY

Introduction

RECEIVED

JUN 17 2019

TCEQ  
CENTRAL FILE ROOM

**BLUE RIDGE LANDFILL - FRESNO**

**3/21/2019 to 4/1/2019 Inv. # - 1553915**

**Page 2 of 4**

---

The Texas Commission on Environmental Quality (TCEQ), Houston Region 12 Office, conducted a pretest meeting in response to a stack test notification/ test protocol (#4628) submitted by Blue Ridge Landfill TX LP, Blue Ridge Landfill (BRL) on 2/1/2019. The purpose of this investigation (Investigation Typecode PRES0N) is to determine compliance with applicable stack test methods and protocols.

**Daily Narrative**

A pretest meeting was conducted at BRL on 3/21/2019 at 10 am. The following participated in the meeting:

- 1) Chance Seely, Environmental Specialist, Republic Services
- 2) Angie Vandergriff, Senior Project Manager, Weaver Consultants Group LLC
- 3) Corbin Hennick, Environmental Investigator, TCEQ

This test is being completed in order to demonstrate compliance with the New Source Performance Standard (NSPS) for Municipal Solid Waste Landfills (NSPS WWW) and 40 CFR 60.18. The test company did not propose any deviations to the EPA test methods. An active gas collection and control system (GCCS) is installed at the landfill. The GCCS is used to extract and convey the landfill gas (LFG) to the landfill flares and the existing landfill gas-to-energy (LFGTE) facility. The blower supplies the vacuum necessary to extract the LFG from the landfill and discharge it for combustion.

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.

Source Name: Utility Flare  
Emission Point Number (EPN): UFLARE1

Testing Required by: 40 CFR Part §60.8 and §60.18  
Initial Compliance Test: Yes  
If Initial, Unit Start-Up Date: 12/20/2018  
Test Deadline: 6/18/2019  
Proposed Test Date(s): 4/9/2019  
Sampling Consultant Contact, Sampling Company: Angie Vandergriff, Weaver Consultants Group  
Facility Contact: Scott Trebus, P.E., Republic Services

**SAMPLING INFORMATION:**

**General Information**


- 1) Who will conduct opacity observations during sampling period if required? Angie Vandergriff
- 2) What type of safety protection/precautions are required at site and to observe the testing?  
A hard hat, safety vest, and steel toe boots will be worn.
- 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? Yes
- 5) Was the TCEQ confidentiality policy discussed? Yes

**Test Methodology**

Sample Location: Samples will be taken at the sampling port prior to the flare.  
Port Height Above Ground: <5 ft  
Sample Location Accessible: yes  
Number of ports to be utilized: 1  
Diameter of stack/duct to be sampled: 14.2 ft.  
Number of Sampling Points: 1  
Number of Test Runs: 4 sample canisters will be used to collect LFG at the sample port, three sample canisters will be analyzed and the 4th will be held and analyzed only if one of the canisters should leak in transit  
Location of Sample Analysis: Air Technology Labs

Signed   
\_\_\_\_\_  
Environmental Investigator

Date 4/10/2019

Signed   
\_\_\_\_\_  
Supervisor

Date 4/29/19

**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) : \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**BLUE RIDGE LANDFILL - FRESNO**

**3/21/2019 to 4/1/2019 Inv. # - 1553915**

**Page 3 of 4**

---

**SUMMARY OF SAMPLING METHODS:**

EPA Method 3C: Landfill Gas (LFG) Methane Content  
EPA Method 22: Visible Emissions

**PROCESS DATA:**

Proposed Operating Rate of Unit during testing: <6,000 scfm  
Design Maximum Operating Rate of Unit: 6,000 scfm  
Normal Operating Rate of Unit: The flare does not regularly operate. The flare is used when there is more landfill gas than the energy facility can use, and during maintenance of the energy facility.  
List Control Devices to be Operated During Test: Landfill Gas Utility Flare  
Indicate Who Will Monitor and Record Process Parameters Required to be Monitored:  
Weaver Consultants Group  
Summary of Process Data to be Collected

Process Parameter to be monitored: Flow and Methane Content  
Method of Monitoring: EPA Method 3C and calibrated flow meter  
Approximate Range of Operation: The flare will operate at <6,000 scfm during the event and the methane content of LFG is approximately 50%

**Exit Interview**

The pretest meeting ended at 11:10 am. 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**

BRL is a waste disposal facility. Details of process description can be found at the TCEQ Central File Room.

**BACKGROUND**

**Agreed Orders, Court Orders, and Other Compliance Agreements**

These are not reviewed for this type of investigation.

**Prior Enforcement Issues**

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

**Complaints**

Information regarding complaints for this site can be found in the TCEQ Central File Room.

**Conclusion, Recommendations, and Current Enforcement Actions**

1) The test protocol/ sampling methods submitted by BRL did not have any deviations from the approved methods. The proposed test appears to be in compliance with the applicable stack test sampling requirements.

**Additional Issues**

There were no additional issues.

**No Violations Associated to this Investigation**