

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 19, 2018

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

Re: Investigation Request at:  
Blue Ridge Landfill, 2200 FM 521 Rd, Fresno (Fort Bend County), Texas  
Regulated Entity No.: 102610102  
TCEQ MSW Permit No.: 1505A  
Investigation No.: 1532183

Dear Mr. Stengl:

The Texas Commission on Environmental Quality (TCEQ) Houston Region Office received on November 27, and 28, 2018 and December 03, 2018, requests for assistance regarding the odor at the above-referenced facility. In response to this request, Ms. Reyna L. Loosmore and Mr. Carlos Griggs of this office conducted an investigation on December 02, and 06, 2018. No violations are being alleged as a result of the investigation.

For more information about our complaint process, you may access the publication GI-278: *Do You Want to Make an Environmental Complaint? Do You Have Information or Evidence?* on our website at [www.tceq.texas.gov](http://www.tceq.texas.gov).

We appreciate your assistance in this matter and your interest in protecting the quality of our environment. If you have any questions concerning these findings, or if we can be of further assistance, please contact Ms. Loosmore at this office (713) 767-3706.

Sincerely,

A handwritten signature in cursive script that reads "Alma L. Jefferson".

Alma L. Jefferson, Manger  
Waste Section  
Houston Region Office

ALJ/RLL/ug

MSW PA\_1505A\_CP\_20181202\_Investigation  
**Texas Commission on Environmental Quality**  
**Investigation Report**

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

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

**Regulated Entity Name: BLUE RIDGE LANDFILL**

**Regulated Entity Number: RN102610102**

**Investigation #** 1532183

**Incident Numbers**

298424	297944
298427	298400
297946	298420
298422	297941
297947	299090
298425	297948
298421	297942
297949	297940
297943	298017

**Investigator:** REYNA LOOSMORE

**Site Classification** TYPE 1

**Conducted:** 12/02/2018 -- 12/06/2018

**NAIC Code:** 562212

**NAIC Code:** 486210

**SIC Code:** 4922

**SIC Code:** 4953

**SIC Code:** 1521

**Program(s):** MUNICIPAL SOLID WASTE DISPOSAL

**Investigation Type:** Compliance Investigation

**Location:** LOCATED ON 2200 FM 521

**Additional ID(s):** 1505A

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

**Local Unit:** REGION 12 - HOUSTON

**Activity Type(s):** MSWCMPL - Investigation of MSW  
 complaint

**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 MANAGER	MR BURGESS STENGL	Office (713) 676-7669
REGULATED ENTITY MAIL CONTACT	ENVIRONMENTAL MANAGER	MR BURGESS STENGL	Office (713) 676-7669
PARTICIPATED IN	DIVISION MANAGER	MR MARK MEADOWS	Phone (281) 668-9739

**BLUE RIDGE LANDFILL - FRESNO**

**12/2/2018 to 12/6/2018 Inv. # - 1532183**

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**Other Staff Member(s):**

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

**Associated Check List**

<b><u>Checklist Name</u></b>	<b><u>Unit Name</u></b>
MSW COMPLAINT INVESTIGATION	1505A Complaint

**Investigation Comments:**

**INTRODUCTION**

On November 27, 28 and December 3, 2018, the Texas Commission on Environmental Quality (TCEQ) Houston Region Office Waste Section received 18 complaints alleging odors from Blue Ridge Landfill (BRL) located at 2200 FM 521 Road, Fresno (Fort Bend County), Texas 77545. The odors were alleged to have occurred on November 24, 26 and December 1 and 2, 2018.

On December 2, 2018, Ms. Reyna L. Loosmore and Mr. Carlos Griggs, Environmental Investigators of the TCEQ Houston Region Office Waste Section, conducted odor surveys in the area surrounding BRL. On December 6, 2018, Ms. Loosmore, conducted an unannounced on-site Odor Complaint Investigation at BRL.

**BACKGROUND**

A Notice of Enforcement was issued to BRL on October 21, 2016 for failure to prevent nuisance odor conditions. On July 12, 2017, Agreed Order Docket No. 2016-1923-AIR-E was signed by the TCEQ. By letter dated April 10, 2018, the TCEQ Enforcement Division approved BRL Odor Control Plan, thus requiring BRL to implement all provisions of the plan in accordance with the approved schedule.

**GENERAL FACILITY AND PROCESS INFORMATION**

BRL is a Type I landfill which is authorized to operate by TCEQ Municipal Solid Waste (MSW) Permit No. 1505A.

The landfill is authorized to dispose of MSW including household solid waste, commercial solid waste, construction and demolition waste, and yard waste; Class 1, Class 2, and Class 3 non-hazardous industrial solid waste; and certain special wastes. Liquid waste will be accepted at the Liquid Waste Bulking Facility for stabilization and subsequent disposal. BRL may not accept regulated hazardous waste, prohibited polychlorinated biphenyls, or untreated medical waste.

The waste acceptance hours are Monday through Friday, 4:00 a.m. to 5:00 p.m., and Saturdays from 5:30 a.m. to 12:00 p.m. The surrounding land use includes industrial facilities and residential subdivisions.

**Complainant Information:**

TCEQ Incident Nos. 297940, 297941, 297942, 297943, 297944, 297946, 297947, 297948, 297949, 298017, 298400, 298420, 298421, 298422, 298424, 298425, 298427 and 299090.

**Description of Alleged Effects:**

Headache, nausea, cough and sleeplessness were described as occurring because of the odors.

**Meteorological data at the time of the odor survey:**

Date: December 2, 2018

Wind Direction: southwest (SW) to west

**BLUE RIDGE LANDFILL - FRESNO**

**12/2/2018 to 12/6/2018 Inv. # - 1532183**

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Wind Speed: 0.8 – 2.3 miles per hour (mph)

Outdoor Temperature: 52.5 – 53.6 °F

Meteorological data taken from TCEQ's continuous air monitoring station Manvel Croix Park C84 weather station (Attachment 1).

Odor Survey (OS):

The investigators conducted OS No. 1 at 3:26 a.m., crosswind of BRL at the intersection of Amy Ridge Road and McHard Road (FM 521). No odors were detected during the 60 minutes spent at OS No. 1.

OS No. 2, located at the 3100 block of Vintage View Lane in Pearland and crosswind of BRL, was conducted at 4:30 a.m. No odors were detected during the 60 minutes spent at OS No. 2.

OS No. 3, located at the 2400 block of Lost Bridge Lane in Pearland and downwind of BRL, was conducted at 4:34 a.m. No odors were detected during the 60 minutes spent at OS No. 3.

OS No. 4, located at the 2100 block of Pearl Bay Court and downwind of BRL, was conducted at 5:36 a.m. Garbage odors were detected during one (1) of the 60 minutes spent at OS No. 4, averaging to a very light intensity.

OS No. 5, located at the 1900 block of Cayman Bend Lane in Pearland and crosswind of BRL, was conducted at 5:38 a.m. No odors were detected during the 60 minutes spent at OS No. 5.

An aerial view map of the OS location and the OS log are included in Attachment 1.

Summary of the on-site investigation:

On December 6, 2018, Ms. Loosmore arrived at BRL and met with Mr. Mark Meadows, Division Manager, and Mr. Burgess Stengl, Environmental Manager, to whom the purpose and scope of the investigation were explained.

The facility representatives drove the investigator to the MSW and Class 1 working faces, by which piles of soil were observed. The investigator obtained a copy of the MSW and Class 1 cover logs from November 1 to December 5, 2018 (Attachment 2). The cover logs indicate that six (6) inches of soil is applied at the end of each operating day to the Class 1 and MSW working faces as required.

Description of Odor:

Garbage odors were detected during the odor survey.

Description of the Effects on the Investigator:

No health effects were experienced by the investigators.

Description of the Terrain Features of the Area:

Terrain is flat with residences and businesses.

Location of the Source of the Odor:

While off-site, the investigators detected odors from the direction of BRL.

Odor Frequency, Intensity, Duration and Offensiveness (FIDO) Chart Evaluation:

According to the FIDO protocol, the odor of landfill garbage is characterized as "offensive". Landfill garbage odors were previously detected coming from the direction of BRL on October 18, 28 and November 24, 2018. Therefore, the frequency of odors documented by the investigator is a monthly occurrence.

CONCLUSION

**BLUE RIDGE LANDFILL - FRESNO**

12/2/2018 to 12/6/2018 Inv. # - 1532183

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According to FIDO protocol, nuisance odor conditions were not confirmed during the investigation conducted on December 2 and 6, 2018. The complaints are closed.

**No Violations Associated to this Investigation**

Signed   
Environmental Investigator

Date 12/19/2018

Signed   
Supervisor

Date 12/19/2018

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

Enforcement Action Request (EAR)

Letter to Facility (specify type) : No Action Letter

Investigation Report

Sample Analysis Results

Manifests

Notice of Registration

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) :

See List of Attachments

**Blue Ridge Landfill**  
**2200 F.M. 521, Fresno (Fort Bend County), TX 77545**  
**Municipal Solid Waste Permit No. 1505A**  
**MSW Complaint Investigation**  
**Conducted on December 2 and 6, 2018**

**List of Attachments**

**Attachment 1: Meteorological Information, Map of Odor Survey locations and Odor Logs**

**Attachment 2: November and December 2018 Cover Logs**

# **ATTACHMENT 1**

# Manvel Croix Park C84 Data by Site by Date (all parameters)

Use this form to retrieve hourly data collected at Manvel Croix Park C84. Although this is the most current data, it is not considered official until it has been certified by the technical staff. This information is updated hourly.

This web page provides the most current hourly averaged data available. Our convention for time-tagging data is the beginning of each hour. For example, values shown for the noon hour are based on measurements taken from noon to 1:00 p.m. The noon average will not be calculated until after 1:00 p.m. The noon average will then be available on our external server from 1:15 p.m. to 1:30 p.m. This results in an apparent one-hour time lag in the data. We also present our data in Local Standard Time for each measuring site. For most of Texas this is Central Standard Time. During Daylight Savings, this introduces another apparent one-hour time lag in the data.

Use the controls below to select a different date or time format. Click on the Generate Report button once you have made your selections.

Click on the Plot Data button once the tabular report has been generated to open a separate window containing data plots.

Find Site:

**Month:**  **Day:**  **Year:**  **Time Format:**

Green underline for validated data

The table below contains hourly averages for all the pollutants and meteorological conditions measured at Manvel Croix Park C84 for **Sunday, December 2, 2018**. All times shown are in CST.

Parameter Measured	Morning												Afternoon							
	Mid	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00	10:00	11:00	Noon	1:00	2:00	3:00	4:00	5:00	6:00	
<a href="#">Nitric Oxide</a>	<b>-0.2</b>	SPN	SPN	SPN	SPN	SPN	-0.1	0.3	1.1	<b>2.2</b>	1.7	1.3	0.8	0.3	0.2	0.3	0.1	-0.1	-0.1	
<a href="#">Nitrogen Dioxide</a>	7.2	SPN	SPN	SPN	SPN	SPN	<b>2.9</b>	3.7	5.9	7.5	6.9	6.4	5.8	5.3	5.4	6.5	9.5	18.2	21.0	
<a href="#">Oxides of Nitrogen</a>	7.2	SPN	SPN	SPN	SPN	SPN	<b>2.8</b>	4.0	7.0	9.8	8.6	7.8	6.6	5.7	5.7	6.9	9.7	18.4	21.2	
<a href="#">Ozone</a>	16	8	9	<b>7</b>	8	14	16	15	19	24	30	35	41	45	48	<b>50</b>	46	31	25	
<a href="#">Wind Speed</a>	2.3	2.7	2.2	<b>0.8</b>	2.3	2.0	0.9	1.5	4.5	<b>6.7</b>	6.6	6.5	6.0	4.5	4.7	4.1	4.3	2.8	3.7	
<a href="#">Resultant Wind Speed</a>	2.2	2.6	2.2	<b>0.6</b>	2.1	1.8	0.6	1.4	4.2	<b>6.3</b>	6.2	6.0	5.5	4.0	4.3	3.8	4.1	2.8	3.4	
<a href="#">Resultant Wind Direction</a>	200	197	199	222	217	225	262	248	293	329	345	<b>356</b>	353	13	12	17	42	35	53	
<a href="#">Maximum Wind Gust</a>	4.0	4.4	3.6	<b>2.0</b>	4.2	3.7	3.0	4.2	10.1	<b>12.9</b>	12.6	11.4	11.4	9.7	9.3	7.7	8.8	5.2	5.3	
<a href="#">Std. Dev. Wind Direction</a>	15	12	13	39	22	21	<b>45</b>	22	20	20	20	22	23	26	26	22	15	<b>9</b>	23	
<a href="#">Outdoor Temperature</a>	56.6	55.7	54.5	53.6	<b>52.5</b>	52.6	53.1	54.0	59.9	64.9	68.9	71.3	73.4	75.1	76.5	<b>76.9</b>	76.0	73.2	69.4	
<b>Parameter Measured</b>	<b>Mid</b>	<b>1:00</b>	<b>2:00</b>	<b>3:00</b>	<b>4:00</b>	<b>5:00</b>	<b>6:00</b>	<b>7:00</b>	<b>8:00</b>	<b>9:00</b>	<b>10:00</b>	<b>11:00</b>	<b>Noon</b>	<b>1:00</b>	<b>2:00</b>	<b>3:00</b>	<b>4:00</b>	<b>5:00</b>	<b>6:00</b>	
	<b>Morning</b>												<b>Afternoon</b>							
	Maximum values for each parameter are <b>bold</b> within the table. Minimum values are <b>bold italic</b> .																			
	<b>R</b> - Data from this instrument meets EPA quality assurance criteria for regulatory purposes.																			



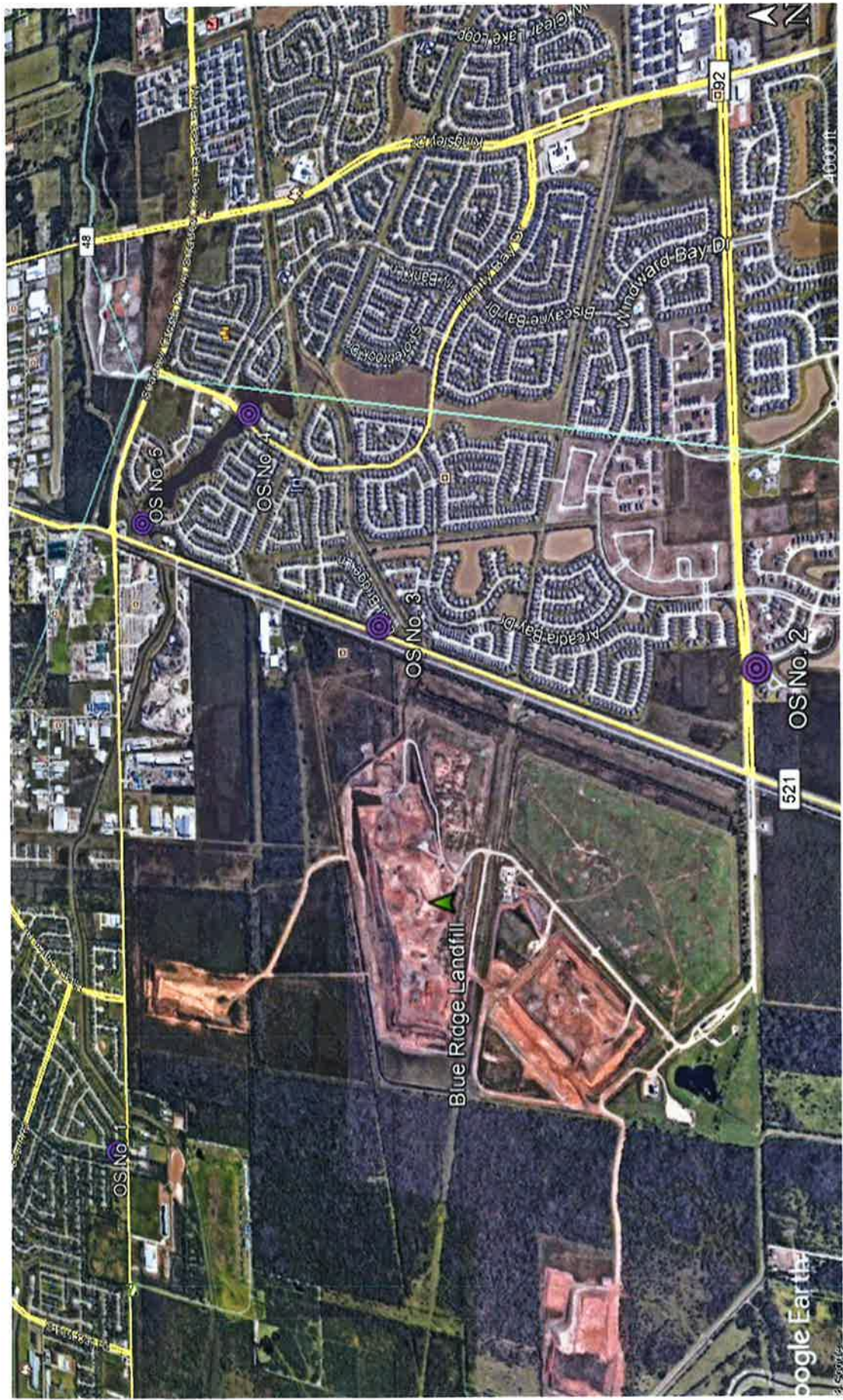
**PLEASE NOTE:** This data has not been verified by the TCEQ and may change. This is the most current data, but it is not official until it has been certified by our technical staff. Data is collected from TCEQ ambient monitoring sites and may include data collected by other outside agencies. This data is updated hourly. All times shown are in local standard time unless otherwise indicated.

Following EPA reporting guidelines, negative values may be displayed in our hourly criteria air quality data, down to the negative of the EPA listed Method Detection Limit (MDL) for the particular instrument that made the measurements. The reported concentrations can be negative due to zero drift in the electronic instrument output, data logger channel, or calibration adjustments to the data. Prior to 1/1/2013, slightly negative values were automatically set to zero.

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Last Modified Tuesday, 30 Jan 2018



TCEQ Waste Section  
December 2, 2018 Odor Surveys

# Supplemental Investigator's Odor Intensity Time Log

Investigator: Reyna Loosmore

Location: Int of Amy Ridge Rd & McHenry Rd

Date of Investigation: December 2, 2018

Start Time: 3:26 am

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
15	No odor
16	No odor
17	No odor
18	No odor
19	No odor
20	No odor
21	No odor
22	No odor
23	No odor
24	No odor
25	No odor
26	No odor
27	No odor
28	No odor
29	No odor
30	No odor

Minutes	Odor Intensity VL, L, M, S, VS
31 min	No odor
32	No odor
33	No odor
34	No odor
35	No odor
36	No odor
37	No odor
38	No odor
39	No odor
40	No odor
41	No odor
42	No odor
43	No odor
44	No odor
45	No odor
46	No odor
47	No odor
48	No odor
49	No odor
50	No odor
51	No odor
52	No odor
53	No odor
54	No odor
55	No odor
56	No odor
57	No odor
58	No odor
59	No odor
60	No odor

Odor Description: \_\_\_\_\_

Offensiveness: Highly \_\_\_\_\_ Offensive \_\_\_\_\_ Unpleasant \_\_\_\_\_ Not Unpleasant \_\_\_\_\_

**Weighted Average Intensity:**

	VS	S	M	L	VL	No Odor
1 Min						
10 Min						
1 Hour						

# Supplemental Investigator's Odor Intensity Time Log

Investigator: Carlos Briggs  
 Date of Investigation: 12/2/18

Location: 3100 Block of Vintage View Lane  
 Start Time: 4:30 am

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
15	No odor
16	No odor
17	No odor
18	No odor
19	No odor
20	No odor
21	No odor
22	No odor
23	No odor
24	No odor
25	No odor
26	No odor
27	No odor
28	No odor
29	No odor
30	No odor

Minutes	Odor Intensity VL, L, M, S, VS
31 min	No odor
32	No odor
33	No odor
34	No odor
35	No odor
36	No odor
37	No odor
38	No odor
39	No odor
40	No odor
41	No odor
42	No odor
43	No odor
44	No odor
45	No odor
46	No odor
47	No odor
48	No odor
49	No odor
50	No odor
51	No odor
52	No odor
53	No odor
54	No odor
55	No odor
56	No odor
57	No odor
58	No odor
59	No odor
60	No odor

Odor Description: \_\_\_\_\_

Offensiveness: Highly \_\_\_\_\_ Offensive \_\_\_\_\_ Unpleasant \_\_\_\_\_ Not Unpleasant \_\_\_\_\_

**Weighted Average Intensity:**

	VS	S	M	L	VL	No Odor
1 Min						
10 Min						
1 Hour						

# Supplemental Investigator's Odor Intensity Time Log

Investigator: Reyna Laasmore

Location: 2400 back of last bridge Ln

Date of Investigation: December 2, 2018

Start Time: 4:34 am

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
15	No odor
16	No odor
17	No odor
18	No odor
19	No odor
20	No odor
21	No odor
22	No odor
23	No odor
24	No odor
25	No odor
26	No odor
27	No odor
28	No odor
29	No odor
30	No odor

Minutes	Odor Intensity VL, L, M, S, VS
31 min	No odor
32	No odor
33	No odor
34	No odor
35	No odor
36	No odor
37	No odor
38	No odor
39	No odor
40	No odor
41	No odor
42	No odor
43	No odor
44	No odor
45	No odor
46	No odor
47	No odor
48	No odor
49	No odor
50	No odor
51	No odor
52	No odor
53	No odor
54	No odor
55	No odor
56	No odor
57	No odor
58	No odor
59	No odor
60	No odor

Odor Description: \_\_\_\_\_

Offensiveness: Highly \_\_\_\_\_ Offensive \_\_\_\_\_ Unpleasant \_\_\_\_\_ Not Unpleasant \_\_\_\_\_

**Weighted Average Intensity:**

	VS	S	M	L	VL	No Odor
1 Min						
10 Min						
1 Hour						

# Supplemental Investigator's Odor Intensity Time Log

Investigator: Carlos Briggs  
 Date of Investigation: 12/2/18

Location: 2100 Block of Pearl Bay Court  
 Start Time: 5:36 am

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	VL
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
15	No odor
16	No odor
17	No odor
18	No odor
19	No odor
20	No odor
21	No odor
22	No odor
23	No odor
24	No odor
25	No odor
26	No odor
27	No odor
28	No odor
29	No odor
30	No odor

Minutes	Odor Intensity VL, L, M, S, VS
31 min	No odor
32	No odor
33	No odor
34	No odor
35	No odor
36	No odor
37	No odor
38	No odor
39	No odor
40	No odor
41	No odor
42	No odor
43	No odor
44	No odor
45	No odor
46	No odor
47	No odor
48	No odor
49	No odor
50	No odor
51	No odor
52	No odor
53	No odor
54	No odor
55	No odor
56	No odor
57	No odor
58	No odor
59	No odor
60	No odor

Odor Description: Garbage

Offensiveness: Highly \_\_\_\_\_ Offensive  Unpleasant \_\_\_\_\_ Not Unpleasant \_\_\_\_\_

**Weighted Average Intensity:**

	VS	S	M	L	VL	No Odor
1 Min					X 1 min	
10 Min						
1 Hour						

# Supplemental Investigator's Odor Intensity Time Log

Investigator: Reyna Loosmore Location: 1900 hwy 4 of Cayman Bend Ln  
 Date of Investigation: December 2, 2018 Start Time: 5:38 am

Minutes	Odor Intensity VL, L, M, S, VS
1 min	No odor
2	No odor
3	No odor
4	No odor
5	No odor
6	No odor
7	No odor
8	No odor
9	No odor
10	No odor
11	No odor
12	No odor
13	No odor
14	No odor
15	No odor
16	No odor
17	No odor
18	No odor
19	No odor
20	No odor
21	No odor
22	No odor
23	No odor
24	No odor
25	No odor
26	No odor
27	No odor
28	No odor
29	No odor
30	No odor

Minutes	Odor Intensity VL, L, M, S, VS
31 min	No Odor
32	No Odor
33	No Odor
34	No Odor
35	No Odor
36	No Odor
37	No Odor
38	No Odor
39	No Odor
40	No Odor
41	No Odor
42	No Odor
43	No Odor
44	No Odor
45	No Odor
46	No Odor
47	No Odor
48	No Odor
49	No Odor
50	No Odor
51	No Odor
52	No Odor
53	No Odor
54	No Odor
55	No Odor
56	No Odor
57	No Odor
58	No Odor
59	No Odor
60	No Odor

Odor Description: \_\_\_\_\_

Offensiveness: Highly \_\_\_\_\_ Offensive \_\_\_\_\_ Unpleasant \_\_\_\_\_ Not Unpleasant \_\_\_\_\_

Weighted Average Intensity:

	VS	S	M	L	VL	No Odor
1 Min						
10 Min						
1 Hour						

## **ATTACHMENT 2**





1	
2	
3	Graded to Repair Easements Phase II work slope AM-TT/52-56
4	
5	Graded to Repair Easements Phase III work slope. FH-14/37-38 Graded New Land for driveway Phase II see next cell - 7/25/1
6	Graded to Repair Easements Phase III work slope HT-11/50-53
7	
8	
9	Graded to Repair Easements Phase III work slope 53-54B/53-56
10	Revised Graded to Repair Easements Phase II F-1/25-30 + Repair Easements Easement Phase III 77-80B/54-58
11	
12	Remove + Graded to Repair Rcs Phase III C-F/24-27 + Graded
13	Graded to Repair Easements Phase II A-D/22-27
14	
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21	
22	
23	
24	
25	
26	
27	
28	Graded to Repair Easements - Phase III work slope K-11/44-45, east slope 17-20/42-43 Graded to Repair Easements
29	Graded to Repair Easements work slope 50-51/14, west slope well 3-30 + well 7-37, west slope H-5/42-43
30	
31	

**COVER APPLICATION LOG CLASS I NON HAZARDOUS**

Month / Year: Class 1 November 2018

AMT	Daily Cover			Approved Alternate Daily Cover			Elevation		Inspection		Erosion or Leachate		Corrective Action		Final Cover			Inspection	Erosion or Leachate	Date Erosion Corrected	Corrective Action	Final Cover	Supervisor Signature		
	Grid Area	T	Method	Grid Area	T	Method	MSL	NSL	Date of Daily Cover	Leachate Detected	Date Erosion or Leachate Corrected	Soil Stockpile Required (yd <sup>3</sup> )	Rain (inches)	Rain (inches) 2.0-5"	Grid Area	T	Method							Date of Intermediate Cover	Leachate Detected
1500	G-29	6"	B	-	-	-	48		✓																
2500	G-31	6"	B	-	-	-	50		✓																
3																									
4																									
5	500	D-31	6"	B	-	-	52		✓																
6	500	D-31	6"	B	-	-	54		✓																
7	500	D-31	6"	B	-	-	56		✓																
8	500	D-31	6"	B	-	-	58		✓																
9	500	D-31	6"	B	-	-	60		✓																
10																									
11																									
12	500	H-29	6"	B	-	-	42		✓																
13	500	H-29	6"	B	-	-	45		✓																
14	500	H-29	6"	B	-	-	48		✓																
15	500	H-29	6"	B	-	-	52		✓																
16	500	H-29	6"	B	-	-	55		✓																
17																									
18																									
19	500	H-29	6"	B	-	-	57		✓																
20	500	H-29	6"	B	-	-	59		✓																
21	500	H-29	6"	B	-	-	61		✓																
22																									
23	500	G-29	6"	B	-	-	42		✓																
24																									
25																									
26	500	G-29	6"	B	-	-	44		✓																
27	500	G-29	6"	B	-	-	46		✓																
28	500	G-29	6"	B	-	-	49		✓																
29	500	G-29	6"	B	-	-	52		✓																
30	500	G-29	6"	B	-	-	55		✓																
31																									

AMT = Amount of cover (soil) in yd<sup>3</sup> or alternate daily cover in bags or tarp area  
 T = Thickness in inches  
 Methods: A = Tarp Machine, B = Soil by Heavy Equipment, S = Spray-On  
 Inspect areas with daily cover or alternate daily cover each day the site is in operation and areas with intermediate and final cover weekly or within 72 hours of a rainfall event of 0.5" or more. Inspect all areas in accordance with Site Operating Plan Section 4.18. Additional documentation area on back of form  
 Erosion of daily cover must be corrected within 24 hours after the area is accessible. Erosion of intermediate or final cover must be corrected within 5 days of detection unless approved by TCEQ Regional Office. If not corrected within 5 days, attach documentation stating reasons for delay.  
 Corrective Action: R = Restoring cover material; G = Grading; M = Compacting; S = Seeding  
 SOP Section 7.74 requires a soil stockpile to be maintained within 1,000 ft of the working face. The amount of soil required is dependent upon the maximum anticipated size of the working face. A 50 yd<sup>3</sup> soil stockpile is required within 100ft of the Regulated Asbestos-Containing Material (RACM) disposal area.  
 Signature certifies work accomplished as stated in the Cover Application Log.

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29	Graded to Repair A15 Phase II Top Deck 20-25/ A-F
30	Graded to Repair A15 Phase II Top Deck 15-20/F-M
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MSW

**COVER APPLICATION LOG**

Line #	Daily Cover				Approved Alternative Daily Cover				Elevation MSL	Inspection Date of Daily Cover <sup>1</sup>	Erosion or Leachate Seep Detected <sup>2</sup>	Date Erosion or Leachate Seep Corrected <sup>3</sup>	Corrective Action <sup>4</sup>	Soil Stockpile Required <sup>5</sup> (yd <sup>3</sup> )	Rain (Inches) ≥ 0.5"	Rain (Inches) ≥ 0.5"	Intermediate Cover				Final Cover				Inspection Date of Intermediate & Final Cover <sup>7</sup>	Erosion 2-4" Detected	Date Erosion Corrected <sup>8</sup>	Corrective Action <sup>9</sup>	Final Cover Certification Record Reference	Supervisor Signature <sup>10</sup>					
	Grid Area	T <sup>2</sup>	Method <sup>1</sup>	AMT <sup>6</sup>	Grid Area	T <sup>2</sup>	Method <sup>1</sup>	AMT <sup>6</sup>									Grid Area	T <sup>2</sup>	Method <sup>1</sup>	AMT <sup>6</sup>	Grid Area	T <sup>2</sup>	Method <sup>1</sup>	AMT <sup>6</sup>							Grid Area	T <sup>2</sup>	Method <sup>1</sup>	AMT <sup>6</sup>	Grid Area
1	500	30-57	6" B	B	-	-	50-52	-	-	12/3/18	✓																								
2	3750	54-57	6" B	B	-	-	52-58	-	-	12/4/18	✓																								
4	750	58-59	6" B	B	-	-	60-66	-	-	12/5/18	✓																								
5	750	58-59	6" B	B	-	-	66-72	-	-																										
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AMT = Amount of cover (soil) in yd<sup>3</sup> or alternate daily cover in bags or tarp area  
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Methods: A = Tarp Machine, B = Soil by Heavy Equipment, S = Spray-On

Inspect areas with daily cover or alternate daily cover each day the site is in operation and areas with intermediate and final cover weekly or within 72 hours of a rainfall event of 0.5" or more. Inspect all areas in accordance with Site Operating Plan Section 4.18. Additional documentation area on back of form.

Erosion of daily cover must be corrected within 24 hours after the area is accessible. Erosion of intermediate or final cover must be corrected within 5 days of detection unless approved by TCEQ Regional Office. If not corrected within 5 days, attach documentation stating reasons for delay.

Corrective Action: R = Restoring cover material, G = Grading, M = Compacting, S = Seeding

SOP Section 7.4 requires a soil stockpile to be maintained within 1,000 ft of the working face. The amount of soil required is dependent upon the maximum anticipated size of the working face. A 50 yd<sup>3</sup> soil stockpile is required within 100ft of the Regulated Asbestos-Containing Material (RACM) disposal area.

Signature certifies work accomplished as stated in the Cover Application Log.

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3	Records at Gardsel TD Refrain Run & where Phase III Top Deck No. 20/13/15 & EE-NH/10-51
4	Records at Gardsel TD Refrain sections & landmarks were Phase III South Slope No. X/37-50
5	Gardsel TD Refrain Basins Phase III North Slope No. 21/52-56
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**COVER APPLICATION LOG CLASS I NON HAZARDOUS**

Month / Year: December 2018

Grid Area	T <sup>2</sup>	Method <sup>1</sup>	AMT <sup>2</sup>	Grid Area	T <sup>2</sup>	Method <sup>1</sup>	Elevation MSL	Inspection Date of Daily Cover <sup>3</sup>	Erosion of Leachate Area <sup>4</sup>	Date of Erosion Section Corrected <sup>5</sup>	Corrective Action <sup>6</sup>	Soil Stockpile Required (yds <sup>3</sup> )	Rain (inches) ≥ 0.5"	Intermediate Cover			Final Cover			Inspection Date of Intermediate & Final Cover <sup>7</sup>	Erosion Detected	Date Erosion Corrected	Corrective Action	Final Cover Certification Report Reference	Supervisor Signature <sup>8</sup>		
														AMT <sup>2</sup>	Grid Area	T <sup>2</sup>	Method <sup>1</sup>	AMT <sup>2</sup>	Grid Area							T <sup>2</sup>	Method <sup>1</sup>
1																											
2																											
3	500	6'-29"	B				52'	✓																			
4	500	6'-29"	B				60'	✓																			
5	500	7'-30"	B				43'	✓																			
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AMT<sup>2</sup> = Amount of cover (soil) in yd<sup>3</sup> or alternate daily cover in bags or tarp area  
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Methods: A = Tarp Machine, B = Soil by Heavy Equipment, S = Spray-On  
Inspect areas with daily cover or alternate daily cover each day the site is in operation and areas with intermediate and final cover weekly or within 72 hours of a rainfall event of 0.5" or more. Inspect all areas in accordance with Site Operating Plan Section 4.18. Additional documentation area on back of form.  
Erosion of daily cover must be corrected within 24 hours after the area is accessible. Erosion of intermediate or final cover must be corrected within 5 days of detection unless approved by TCEQ Regional Office. If not corrected within 5 days, attach documentation stating reasons for delay.  
Corrective Action: R = Restoring cover material, G = Grading, M = Compacting, S = Seeding  
SOP Section 7.7.4 requires a soil stockpile to be maintained within 1,000 ft of the working face. The amount of soil required is dependent upon the maximum anticipated size of the working face. A 50 yd<sup>3</sup> soil stockpile is required within 100ft of the Regulated Asbestos-Containing Material (RACM) disposal area.  
Signature certifies work accomplished as stated in the Cover Application Log.

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