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April 5, 2018

VIA ELECTRONIC MAIL AND HAND DELIVERY

Bryan Sinclair, Director,
TCEQ Enforcement Division, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: Blue Ridge Landfill, TX, LP; Revised Odor Control Plan
Blue Ridge Landfill, TX, LP; TCEQ Docket No. 2016-1923-AIR-E

Dear Mr. Sinclair:

Enclosed please find Blue Ridge Landfill TX, LP's ("BRLFs") Odor Control Plan ("Plan") which incorporates the new revisions as discussed in BRLF's most recent conversations with TCEQ.

BRLF believes that the enclosed revised Plan now incorporates all of our discussion points and is ready for your approval. We are also resubmitting the attached implementation schedule unchanged from our earlier March 8, 2018 letter, in order to complete the package. Please check that as well and let us know if you have any questions or issues.

BRLF thanks the TCEQ for its assistance in developing this Plan. We look forward to working with TCEQ as its terms are put into practice at Blue Ridge Landfill. Please feel free to contact me (713-676-7613) or by email at BRogers@republicservices.com with any questions or comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "BRogers", with a large loop at the end.

Brandon Rogers
General Manager

Attachment

cc: Rajesh Acharya, Enforcement Coordinator
Andy Goodridge, Air Section Manager, TCEQ Houston Regional Office
Lawrence Morgan, Republic Services
Brandon Rogers, Republic Services
Scott Trebus, Republic Services
Duncan Norton, Lloyd Gosselink Rochelle & Townsend, P.C.
Matt Stutz, Weaver Consultants Group

Attachment 1

Blue Ridge Landfill Odor Control Plan Implementation Schedule

The following outlines the implementation schedule and milestones of relevant standard operating procedures and maintenance practices outlined in the Blue Ridge Landfill Odor Control Plan ("Plan").

- Beginning on January 1, 2017 surface emissions monitoring, reporting procedures, and protocols were implemented as outlined in Appendix 10.
- Following approval of this Plan SEM will be conducted bimonthly (one occurrence every two months) for two years after which SEM will be quarterly.
- Within three weeks after Executive Director approval of the Plan, the 24-hour Odor Complaint Hotline/Message-line and website will be activated.
- Within three weeks after Executive Director approval of the Plan, the dual carbon canister system will be installed.
- Once the 24-hour Odor Complaint Hotline/Message-line and website are activated, the availability of these resources will be communicated to the public via our website and will be posted on the front gate.
- A meeting between the TCEQ and BRLF Management team will be held semi-annually to discuss BRLF odor management progress.
- Within six weeks after Executive Director approval of the Plan, 24-hour fence line monitoring will begin for a five year period.
- Within 30 days after completion of the approved Plan implementation, a written certification will be submitted to document that the Plan has been implemented in accordance with the approved schedule.
- Within 60 days after Executive Director approval of this Plan, a permit modification application will be submitted to incorporate the approved Plan into the Part IV – Site Operating Plan, Operating Procedures, 4.10 Air Quality and Odor Management Plan in Municipal Solid Waste Permit No. 1505A.
- Within 75 days after Executive Director approval of this Plan, a written certification will be submitted to confirm compliance that the permit modification application was submitted.
- Within 240 days after Executive Director approval of the Plan, a written certification will be submitted that the permit modification has been obtained, and will include detailed supporting documentation including photographs, receipts, and/or other records.

Pursuant to paragraph IV. 7. of the Agreed Order, extensions of any deadlines may be granted by the TCEQ Executive Director.