

# ENVIRONMENTAL SAMPLING CORPORATION

*Dedicated to Environmental Monitoring, Science & Technology*

February 25, 2021

Mr. George Volpentesta  
Wisconsin Department of Natural Resources  
141 NW Barstow Street, Room 180  
Waukesha, WI 53188

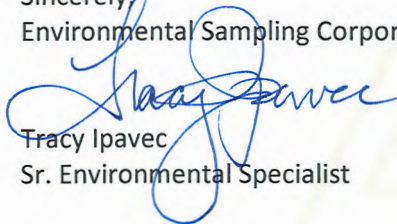
**RE: Emerald Park Landfill**  
**Air Pollution Control Operation Permit No: 268244130-P20**  
**FID No. 268244130**  
**Deviation of Permit Conditions: January 2021**

Dear Mr. Volpentesta:

On behalf of Environmental Emerald Park Landfill (EPL), Environmental Sampling Corporation (ESC) is providing this letter to notify the Wisconsin Department of Natural Resources of recent deviations of the air pollution control operating permit. Additional information is provided in the attached deviation summary report. This deviation will also be reported in the next semi-annual NSPS report.

Should you have any questions, please contact Randy Frank of GFL Environmental, Inc. at 414-422-9075 ext. 102 or the undersigned at 414-427-5033.

Sincerely,  
Environmental Sampling Corporation



Tracy Ipavec  
Sr. Environmental Specialist

Attachment

cc: Mike Stoeckigt: GFL Environmental (electronic copy)  
Tim Curry: GFL Environmental (electronic copy)  
Randy Frank: GFL Environmental (electronic copy)  
Kari Rabideau: GFL Environmental (electronic copy)  
Dan Otzelberger: EPL (electronic copy)  
Chad Siegle: EPL (electronic copy)  
John Paczkowski: EPL (electronic copy)  
Scott Croft: EPL (electronic copy)  
EPL File Copy  
Mark Torresani: Tetra Tech (electronic copy)  
Jo Spear: JSA Environmental (electronic copy)  
Mark Slocomb: EPL Standing Committee (electronic copy)  
City of Muskego, EPL Standing Committee (electronic copy)  
Sherren Clark: SCS Engineers (electronic copy)  
Frank Perugini: ESC (electronic copy)

**Notice:** Deviation Reports are required under s. NR 439.03(1)(b), Wis. Adm. Code. Use of this Table to report deviations is voluntary. Personally Identifiable Information collected on this form is not likely to be used for purposes other than the purpose for which it is being collected. This table may be submitted in conjunction with the Air Operation Permit Compliance Certification to report deviations from permit conditions contained in the Air Operation Permit. Complete items A-C to report deviations. Provide information on each deviation in a separate row of the table. Copy this page as needed to list all deviations for the reporting period specified in this Deviation Summary Report. Personally identifiable information collected on this Form is unlikely to be used for any purpose other than that for which it was originally collected, but may be provided to requesters as required by Wisconsin's Open Records law (ss. 19.31-19.39, Wis. Stats.).

<b>A.) Facility Information</b>	
1.) Facility Name Emerald Park Landfill	2.) FID 268244130
3.) Permit Number <b>Operation Permit: 268244130-P20</b>	4.) Permit Issue Date May 26, 2015

5.) Reporting Period Covered by this Deviation Report  
January 2021

**B.) Deviation Summary Report**

1.) Permit Condition Reference	2.) Emission Unit	3.) Deviation Period Start and End Dates	4.) Date Deviation Previously Reported to DNR	5.) Deviation Description	6.) Method Used to Identify Deviation	7.) Reason for Deviation and Corrective Action Taken
<p><b><u>I.A.1.b.(3)(a)</u></b>            (3) The permittee shall operate each interior wellhead in the gas collection system in the following manner:            (a) Except as specified in (c) below, with a landfill gas temperature less than 131 °F (55 °C).</p> <p><b><u>I.A.1.b.(14)</u></b>            (14) Any temperature, nitrogen, or oxygen readings that do not meet the levels specified in the applicable conditions I.A.1.b.(3) shall be recorded as a monitored exceedance, and the following actions shall be taken. As long as those actions are taken, the exceedance is not a violation of the applicable conditions specified in I.A.1.b.(3).            (a) Action shall be initiated to correct the exceedance within 5 calendar days.            (b) Except as specified in I.A.1.b.(15), if correction of the exceedance cannot be achieved</p> <p><i>(Continued on Page 2)</i></p>	S02, P02 Operation of EPL	<p><b>Vertical Gas Extraction Well:</b>   <b>GEW-68R</b>            Temp &gt; 131 deg. F            12/29/20 – present            (on-going)</p>	December 2020 Deviation Report dated 01/27/21	The monitored temperature at a gas extraction well exceeded 131 deg. F and could not be corrected within 15 days.	Visual review of data	<p>Vertical gas extraction well GEW-68R exceeded the operating temperature during the 12/29/20 monitoring event. The operating temperature could not be brought back into compliance (i.e. less than 131 deg. F) within 15 days. This deviation was on-going as of the date of this deviation report.</p> <p>GFL Environmental personnel contacted WDNR Solid Waste and Air Compliance personnel via telephone on 01/07/21 and 01/12/21 to provide notification of the elevated temperatures at gas extraction well GEW-68R. At the request of the WDNR, GFL Environmental will submit a plan modification to address elevated operating temperatures observed.</p>

# Air Operation Permit Deviation Summary Report

Form 4530-171 (R 9/10)

1.) Permit Condition Reference	2.) Emission Unit	3.) Deviation Period Start and End Dates	4.) Date Deviation Previously Reported to DNR	5.) Deviation Description	6.) Method Used to Identify Deviation	7.) Reason for Deviation and Corrective Action Taken
<p style="text-align: center;"><i>(Continued from Page 1)</i></p> <p>within 15 calendar days after the first measurement, the gas collection system shall be expanded or other appropriate corrective actions approved by the department shall be implemented to correct the exceedance within 120 days of the initial exceedance.                      (c) Any attempted corrective measure shall not cause exceedances of other operational or performance standards.                      (d) An alternative timeline for correcting the exceedance may be submitted to the Department for approval.</p> <p style="text-align: center;"><b><u>Part I.ZZZ.1.b.(1)</u></b></p> <p>(1) Permittee shall comply with compliance demonstration methods required by the NSPS for Municipal Solid Waste Landfills, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence in order to demonstrate compliance with the NESHAPs for Municipal Solid Waste Landfills. Specific NSPS compliance demonstration methods applicable to this facility can be found in sections I.A.1.b of this permit.</p>	<p>S02, P02 Operation of EPL</p>	<p style="text-align: center;"><i>(See above)</i></p>	<p style="text-align: center;"><i>(See above)</i></p>	<p style="text-align: center;"><i>(See above)</i></p>	<p style="text-align: center;"><i>(See above)</i></p>	<p style="text-align: center;"><i>(See above)</i></p>

# Air Operation Permit Deviation Summary Report

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<p style="text-align: center;"><b><u>I.A.1.b.(1)</u></b></p> <p>(1) The permittee shall operate the collection system with negative pressure at each wellhead except under the following conditions:                      (a) A fire or increased well temperature. The permittee shall record each instance when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the semiannual reports as provided in I.ZZZ.4.a.(1);                      (b) Use of a geomembrane or synthetic cover. The permittee shall develop acceptable pressure limits in the design plan;                      (c) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Department.</p> <p style="text-align: center;"><b><u>I.A.1.b.(12)</u></b></p> <p>(12) Any positive pressure readings shall be recorded as a monitored exceedance and the following actions shall be taken. As long as those actions are taken, the exceedance is not a violation of the conditions specified in I.A.1.b.(1).                      (a) If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under compliance demonstration condition I.A.1.b.(1)(a)-(c).                      (b) Except as specified in I.A.1.b.(15), if negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded or other appropriate corrective actions</p> <p style="text-align: center;"><i>(Continued on Page 4)</i></p>	S02, P02 Operation of EPL	<p><b>Vertical Gas Extraction Well:</b></p> <p><b>GEW-82</b> Non-negative Pressure 01/13/21 – 02/04/21 (22 days)</p>	NA	The monitored pressure at a gas extraction well was not negative and was not corrected within 15 days.	Visual review of data	During the January 2021 monthly wellfield monitoring event on 01/13/21, the initial well pressure recorded at GEW-82 was -0.01 in. H <sub>2</sub> O. Although no wellfield adjustment was made, the final well pressure recorded during the event was stored as 0.0 in. H <sub>2</sub> O, which exceeded the operating condition that requires negative pressure at the wellhead. This non-negative well pressure was not identified during a review of the data following the monitoring event. As a result, action was not taken within 5 days to correct the exceedance. The GEW-82 pressure reading was back in compliance during the February 2021 monthly wellfield monitoring event on 02/04/21, 22 days after the initial exceedance.

# Air Operation Permit Deviation Summary Report

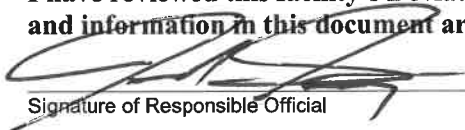
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<p style="text-align: center;"><i>(Continued from Page 3)</i></p> <p>approved by the department shall be implemented to correct the exceedance within 120 days of the initial measurement of positive pressure.                      (c) Any attempted corrective measure shall not cause exceedances of other operational or performance standards.                      (d) An alternative timeline for correcting the exceedance may be submitted to the department for approval.</p> <p style="text-align: center;"><b><u>Part I.ZZZ.1.b.(1)</u></b></p> <p>(1) Permittee shall comply with compliance demonstration methods required by the NSPS for Municipal Solid Waste Landfills, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence in order to demonstrate compliance with the NESHAPs for Municipal Solid Waste Landfills. Specific NSPS compliance demonstration methods applicable to this facility can be found in sections I.A.1.b of this permit.</p>	S02, P02 Operation of EPL	<i>(See above)</i>	<i>(See above)</i>	<i>(See above)</i>	<i>(See above)</i>	<i>(See above)</i>

**C.) Responsible Official Certification**

**NOTE:** A responsible official, as defined in s. NR 400.02(136), Wis. Adm. Code, must sign this deviation summary report. Deviation summary reports that are not signed by a responsible official will be returned as incomplete.

**I have reviewed this facility's Deviation Summary Report. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.**

  
\_\_\_\_\_  
Signature of Responsible Official

Michael Stoeckigt  
\_\_\_\_\_  
Typed or Printed Name of Signatory

Regional Vice President  
\_\_\_\_\_  
Title

2 / 24 / 21  
\_\_\_\_\_  
Date