

ENVIRONMENTAL SAMPLING CORPORATION

Dedicated to Environmental Monitoring, Science & Technology

June 29, 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-P30
FID No. 268244130
Deviation of Permit Conditions: May 2021**

Dear Mr. Volpentesta:

On behalf of 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
Nick Dykstra: 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.).

A.) Facility Information	
1.) Facility Name Emerald Park Landfill	2.) FID 268244130
3.) Permit Number Operation Permit: 268244130-P20 / 268244130-P30	4.) Permit Issue Date May 26, 2015 / March 23, 2021

5.) Reporting Period Covered by this Deviation Report
 May 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>Permit No. 268244130-P30</p> <p><u>Part I.A.1.a.</u></p> <p>(60.753) Operational standards for collection and control systems: The owner or operator shall: (c) Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 °C (131 °F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well, so long as those higher operating levels are approved by the Department. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.</p> <p><i>(Continued on Page 2)</i></p>	P02, F02	<p>Vertical Gas Extraction Well:</p> <p>GEW-68R Temp > 131 deg. F 12/29/20 – 06/15/21 (168 days)</p>	<p>December 2020 Deviation Report dated 01/27/21</p> <p>January 2021 Deviation Report dated 02/25/21</p> <p>February 2021 Deviation Report dated 03/29/21</p> <p>March 2021 Deviation Report dated 04/30/21</p> <p><i>(Continued on Page 2)</i></p>	<p>The monitored temperature at a gas extraction well exceeded 131 deg. F and could not be corrected within 15 days.</p>	<p>Visual review of data</p>	<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.</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, Tetra Tech, on behalf of EPL, submitted a plan modification on 04/22/21 to address elevated operating temperatures observed. The WDNR issued a Conditional Plan of Operation Approval Modification for Supplemental Gas</p> <p><i>(Continued on Page 2)</i></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>Note: Upon issuance of Permit No. 268244130-P30, EPL submitted a petition for a contested case hearing pursuant to Wis. Stat. SS.258.81 and 227.42. Under the Wisconsin rules, the permit conditions that are being appealed are stayed pending the appeal. Since select conditions from Permit No. 268244130-P30 refer to contested permit conditions, when necessary, the permit conditions referenced herein pertain to Permit No. 268244130-P20. As such, Permit No. 268244130-P30 Part I.A.1.a.(60.755)(a)(5) is replaced with the permit condition referenced below.</p> <p style="text-align: center;"><u>I.A.1.b.(14)</u></p> <p>(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 within 15 calendar days after 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 3)</i></p>	<p>P02, F02</p>	<p><i>(See above)</i></p>	<p><i>(Cont. from Page 1)</i></p> <p>April 2021 Deviation Report dated 06/01/21</p>	<p><i>(See above)</i></p>	<p><i>(See above)</i></p>	<p style="text-align: center;"><i>(Continued from Page 1)</i></p> <p>Wells on 05/13/21. Installation of the supplemental gas extraction wells commenced in May 2021 upon receipt of the approval.</p> <p>In a letter dated 04/27/21, the WDNR approved a request for an alternate timeline for corrective actions at GEW-68R in accordance with Permit 268244130-P20 condition I.A.1.b.(14)(d). The deadline for correcting the exceedance was extended to 180 days (i.e. 06/27/21). The deviation at GEW-68R was corrected on 06/15/21, 168 days after the initial exceedance and within the WDNR approved alternate timeline.</p>

Air Operation Permit Deviation Summary Report

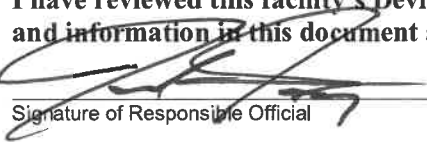
Form 4530-171 (R 9/10)

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<p style="text-align: center;"><i>(Continued from Page 2)</i></p> <p>approved by the department shall be implemented to correct the exceedance within 120 days of the initial exceedance.</p> <p>(c) Any attempted corrective measure shall not cause exceedances of other operational or performance standards.</p> <p>(d) An alternative timeline for correcting the exceedance may be submitted to the Department for approval.</p>	P02, F02	<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

6 / 28 / 21

Date