

ENVIRONMENTAL SAMPLING CORPORATION

Dedicated to Environmental Monitoring, Science & Technology

October 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: September 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. Deviations 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 414-422-9008 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-P30	4.) Permit Issue Date March 23, 2021

5.) Reporting Period Covered by this Deviation Report
September 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> (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 Operation of EPL	<p>Vertical Gas Extraction Wells:</p> <p>GW-118S Temp > 131 deg. F 09/10/21 – 09/27/21 (17 days)</p> <p>GW-121S O₂ > 5% 08/25/21 – 09/10/21 (16 days)</p>	NA	The monitored temperature at one gas extraction well and the monitored oxygen level at a second gas extraction well exceeded the operating limits and could not be corrected within 15 days.	Visual review of data	<p>Vertical gas extraction well GW-118S exceeded the operating temperature during the July 2021 monitoring event. The operating temperature could not be brought back into compliance (i.e. less than 131 deg. F) within 15 days. The wellfield exceedance began on 09/10/21 and was corrected with the applicability of subpart AAAA regulations on 09/27/21, 17 days after the initial exceedance.</p> <p>Vertical gas extraction well GW-121S had an elevated oxygen level that was not corrected within 15 days. The oxygen exceedance began on 08/25/21 and was corrected on 09/10/21, 16 days after the initial exceedance. Monitoring data for GW-121S, which was connected to the gas system on 08/24/21, was not</p> <p><i>(Continued on Page 2)</i></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 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>Permit No. 268244130-P20</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 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>(Continued from Page 1)</i></p> <p style="text-align: center;">properly stored in GFL's internal database and was therefore not identified as an exceedances during the review of the August 2021 gas extraction report.</p>

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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. (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>	P02, F02 Operation of EPL	<i>(See above)</i>	<i>(See above)</i>	<i>(See above)</i>	<i>(See above)</i>	<i>(See above)</i>
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<p>Permit No. 268244130-P30</p> <p style="text-align: center;"><u>Part I.A.1.a.</u></p> <p>(60.756) Monitoring of operations: (c) Each owner or operator seeking to comply with 40 CFR s. 60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment: (1) A heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame. (2) A device that records flow to or bypass of the flare. The owner or operator shall either: (i) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or</p> <p style="text-align: center;"><i>(Continued on Page 4)</i></p>	S01, C01 OPEN FLARE	09/14/21 07:37 – 09/14/21 07:48 (0.19 hr.)	NA	There as one instance in which flare temperature and flare flow data was not recorded for the open flare.	Visual review of data	There were one period of missed open flare temperature and flow data records due to a computer restart to reset the programs. The gas extraction system was operating during this period of missed data records. The datalogger resumed normal operation following the restart. No additional action was required.

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<p style="text-align: center;"><i>(Continued from Page 3)</i></p> <p><u>Part I.A.1.a.</u> (60.758) Recordkeeping requirements: (c) The owner or operator shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in 40 CFR s. 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.</p> <p>(2) The owner or operator shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under 40 CFR s. 60.756.</p> <p>(4) Each owner or operator seeking to comply with 40 CFR Part 60, Subpart WWW, by use of an open flare shall keep up-to-date, readily accessible continuous records of the flame or flare pilot flame monitoring specified under 40 CFR s. 60.756(c), and up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.</p>	<p>S01, C01 OPEN FLARE</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>

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<p>Permit No. 268244130-P30</p> <p style="text-align: center;"><u>Part I.A.1.a.</u></p> <p>(60.756) Monitoring of operations: (b) Each owner or operator seeking to comply with 40 CFR s. 60.752(b)(2)(iii) using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment: (1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ±1 percent of the temperature being measured expressed in degrees Celsius or ±0.5 degrees Celsius, whichever is greater. (2) A device that records flow to or bypass of the control device. The owner or operator shall either: (i) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or</p> <p style="text-align: center;"><u>Part I.A.1.a.</u></p> <p>(60.758) Recordkeeping requirements: (c) The owner or operator shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in 40 CFR s. 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.</p>	<p>S05, C05 ENCLOSED FLARE</p>	<p>Missed Data: 09/14/21 07:37 – 09/14/21 07:48 (0.19 hr.)</p> <p>Erroneous Flare Temperature: 09/30/21 11:35 – 10/01/21 10:16 (22.67 hr.)</p>	<p>NA</p>	<p>There as one instance in which flare temperature and flare flow data was not recorded for the enclosed flare and one extended period of erroneous flare temperature.</p>	<p>Visual review of data</p>	<p>There were one brief period of missed enclosed flare temperature and flow data records on 09/14/21 due to a computer restart to rest the programs. The gas extraction system was operating during this period of missed data records. The datalogger resumed normal operation following the restart. No additional action was required.</p> <p>There was also an extended period of erroneous enclosed flare temperatures (i.e. repeating values) from 09/30/21 11:35 to 10/01/21 12:56 due to a communication error between the enclosed flare and the PLC. The enclosed flare was manually shut down on 10/01/21 10:16 to restore the communications, thus ending the period of deviation in accordance with 40 CFR 63, subpart AAAA regulations. The communications were restored and the datalogger resumed normal operation. No additional action was required.</p>

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<p style="text-align: center;"><i>(Continued from Page 5)</i></p> <p>(2) The owner or operator shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under 40 CFR s. 60.756.</p>	S05, C05 ENCLOSED FLARE	<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

Area Vice President

Title

10 / 29 / 21

Date