

# ENVIRONMENTAL SAMPLING CORPORATION

*Dedicated to Environmental Monitoring, Science & Technology*

June 24, 2022

Mr. Ryan Bergh  
Air Management Engineer-Adv  
Wisconsin Department of Natural Resources  
141 NW Barstow Street, Room 180  
Waukesha, WI 53188

**RE: Emerald Park Landfill**  
**Air Pollution Control Operation Permit No: 26824413A-P31**  
**FID No. 268244130**  
**Deviation of Permit Conditions: May 2022**

Dear Mr. Bergh:

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)  
Scott Croft: EPL (electronic copy)  
Kyle Brickler: 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)

## Air Operation Permit Deviation Summary Report

Form 4530-171 (R 9/10)

**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: 26824413A-P31	4.) Permit Issue Date March 2, 2022
5.) Reporting Period Covered by this Deviation Report May 2022	

### 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>Part I.ZZZ.1.a.(63.1958)(c)(1)</u></b>            (c)(1) Operate each interior wellhead in the collection system with a landfill gas temperature less than 62.8 degrees Celsius (145 degrees Fahrenheit).</p> <p><b><u>Part I.ZZZ.1.a.(63.1960)(a)(4)(i)(A)</u></b>            (A) If a landfill gas temperature less than or equal to 62.8 degrees Celsius (145 degrees Fahrenheit) cannot be achieved within 15 days of the first measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit), the owner or operator must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after a landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit) was first measured. The owner or operator must keep records according to 40 CFR 63.1983(e)(3).</p> <p style="text-align: center;"><i>(Continued on Page 2)</i></p>	F02, P02 Operation of EPL	<p><b>Vertical Gas Extraction Wells:</b></p> <p><b>GW-118S</b>            Temp &gt; 145 deg. F            05/17/22 – ongoing intermittently</p>	NA	<p>The monitored temperature at one gas extraction well exceeded the operating limit for temperature and was not corrected within 15 days.</p> <p>The enhanced monitoring required when temperatures exceed 145 degrees F was not initiated within 7 days as required.</p>	Visual review of data	<p>Vertical gas extraction well GW-118S exceeded the operating temperature during the May 2022 monitoring event. The operating temperature was not brought back into compliance (i.e. less than 145 deg. F) within 15 days. The wellfield exceedance began on 05/17/22 and was corrected by making valve adjustments at the wellhead on 06/03/22, 19 days after the initial exceedance. However, wellhead temperatures have intermittently exceeded 145 degrees since then. In accordance with condition I.ZZZ.1.a.(63.1960)(a)(4)(i)(A), a root cause analysis to address the ongoing intermittent wellhead temperatures &gt;145 degrees F will be prepared within 60 days of the initial exceedance.</p> <p style="text-align: center;"><i>(Continued on Page 2)</i></p>

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<p align="center"><i>(Continued from Page 1)</i></p> <p><b>Part I.ZZZ.1.a.(63.1961)(a)(5)</b></p> <p>(5) To demonstrate compliance with the operational standard for temperature in 40 CFR 63.1958(c)(1), unless a higher operating temperature value has been approved by the department under 40 CFR part 63, subpart AAAA, or under 40 CFR part 60, subpart WWW, or by the Administrator under 40 CFR part 62, subpart GGG or subpart OOO, you must initiate enhanced monitoring at each well with a measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit) as follows:</p> <p>(i) Visual observations for subsurface oxidation events (smoke, smoldering ash, damage to well) within the radius of influence of the well.</p> <p>(ii) Monitor oxygen concentration as provided in paragraph (a)(2) of 40 CFR 63.1961;</p> <p>(iii) Monitor temperature of the landfill gas at the wellhead as provided in paragraph (a)(4) of 40 CFR 63.1961.</p> <p>(iv) Monitor temperature of the landfill gas every 10 vertical feet of the well as provided in paragraph (a)(6) of 40 CFR 63.1961.</p> <p>(v) Monitor the methane concentration with a methane meter using EPA Method 3C of appendix A-6 to 40 CFR part 60, EPA Method 18 of appendix A-6 to 40 CFR part 60, or a portable gas composition analyzer to monitor the methane levels provided that the analyzer is calibrated and the analyzer meets all quality assurance and quality control requirements for EPA Method 3C or EPA Method 18.</p> <p>(vi) Monitor carbon monoxide concentrations, as follows:</p> <p align="center"><i>(Continued on Page 3)</i></p>	<p>F02, P02 Operation of EPL</p>	<p align="center"><i>(See above)</i></p>	<p align="center"><i>(See above)</i></p>	<p align="center"><i>(See above)</i></p>	<p align="center"><i>(See above)</i></p>	<p align="center"><i>(Continued from Page 1)</i></p> <p>The enhanced monitoring required by condition I.ZZZ.1.a.(63.1961)(a)(5), when temperatures exceed 145 degrees F was not initiated within seven days after the initial exceedance (i.e. 05/24/22) due to an oversight by site personnel and 3<sup>rd</sup> party consultant. Site personnel and the 3<sup>rd</sup> party consultant have been re-trained on the requirements and enhanced monitoring has commenced. Data collected will be utilized in performing the root cause analysis.</p>
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<p style="text-align: center;"><i>(Continued from Page 2)</i></p> <p><b><u>Part I.ZZZ.1.a.(63.1961)(a)(5) (Cont.)</u></b></p> <p>(A) Collect the sample from the wellhead sampling port in a passivated canister or multi-layer foil gas sampling bag (such as the Cali-5-Bond Bag) and analyze that sample using EPA Method 10 of appendix A-4 to 40 CFR part 60, or an equivalent method with a detection limit of at least 100 ppmv of carbon monoxide in high concentrations of methane.</p> <p>(B) [Intentionally left blank]</p> <p>(C) When sampling directly from the wellhead, you must sample for 5 minutes plus twice the response time of the analyzer. These values must be recorded. The five 1-minute averages are then averaged to give you the carbon monoxide reading at the wellhead.</p> <p>(D) When collecting samples in a passivated canister or multi-layer foil sampling bag, you must sample for the period of time needed to assure that enough sample is collected to provide five (5) consecutive, 1-minute samples during the analysis of the canister or bag contents, but no less than 5 minutes plus twice the response time of the analyzer. The five (5) consecutive, 1-minute averages are then averaged together to give you a carbon monoxide value from the wellhead.</p> <p>(vii) The enhanced monitoring in this paragraph (a)(5) must begin 7 calendar days after the first measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit); and</p> <p style="text-align: center;"><i>(Continued on Page 4)</i></p>	<p>F02, 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>

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<p style="text-align: center;"><i>(Continued from Page 3)</i></p> <p><b>Part I.ZZZ.1.a.(63.1961)(a)(5) (Cont.)</b></p> <p>(viii) The enhanced monitoring in this paragraph (a)(5) must be conducted on a weekly basis. If four consecutive weekly carbon monoxide readings are under 100 ppmv, then enhanced monitoring may be decreased to monthly. However, if carbon monoxide readings exceed 100 ppmv again, the landfill must return to weekly monitoring.</p> <p>(ix) The enhanced monitoring in this paragraph (a)(5) can be stopped once a higher operating value is approved, at which time the monitoring provisions issued with the higher operating value should be followed, or once the measurement of landfill gas temperature at the wellhead is less than or equal to 62.8 degrees Celsius (145 degrees Fahrenheit).</p>	<p>F02, 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>

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**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

6, 24, 22  
Date