



MEMORANDUM

2013 Advanced Disposal Services Emerald Park Landfill Year End Compliance Officer Report and Audit Summary

TO: Advanced Disposal Services Emerald Park Standing Committee
FROM: Jo-Walter Spear, Jr., P.E.
COPIES: File
DATE: 02/04/14
PROJECT NUMBER: 1012.10030

JSA Civil Environmental Engineers (JSA) has been acting as the Advanced Disposal Services Emerald Park Landfill Standing Committee's (Committee) Compliance Officer since 1999. JSA conducts weekly audits of the Advanced Disposal Services Emerald Park Landfill's (ADSEPL) operations and construction activities. The results of these audits are recorded and presented to the Committee, in addition to being posted on the World Wide Web (WWW) for the public on the City of Muskego's web site.

Throughout 2013, as in previous years, JSA has reported to the Committee; providing the following services

- Attendance to all Committee Meetings
- Auditing of the Operations and Construction of the ADSEPL Site
- Review and recording of all documents publicly released by ADSEPL, DNR, Host Communities, or public entities relating to the ADSEPL Site.
- Archiving of ADSEPL, DNR, and Host Communities' documents.

Specific to 2013, JSA has reported to the Committee and provided the following services

- Construction activities and documentation for the Expansion of the landfill footprint, titled Phase 7B.

JSA performed 51 Operational audits of ADSEPL during 2013, 22 Construction audits were conducted in conjunction with the Operational audits. No Construction audits were conducted separately. Audits are conducted on a weekly basis with one excused for the Christmas Holiday and ADSEPL staff was available for all audits.

No audits were performed without the presence of ADSEPL staff. The site operated under David (Dave) Greier as Operations Manager throughout 2013. In addition to the manager being present for audits, Dean Driggett the Environmental Manager and Brett Coogan, manager of the new Gas Building represented ADSEPL during audits and signed the Audit Forms.

Audits were performed during operational hours of the facility, no audits were conducted on the weekends. Audits are recorded on "Audit Forms", approved by the Committee and ADSEPL. The form is reviewed by both auditor and a ADSEPL representative at the end of each audit prior to signing by both parties. Audit observations are supported by photographs taken in conjunction with the audit. When a compliance issue is observed, it is recorded as an "Action Item" and included on a tallying list of action items for the year. In addition to the audit form, audit photographs, and action item list; a summary of the audit observations is created and included in the final deliverable document. In an effort to save paper and the Manager's time, JSA supplies an electronic copy to the ADSEPL representative and Manager after returning to the office.

Weather Conditions

The weather conditions during the audit were recorded visually and from the weather stations near the area of the landfill. All of the weather readings were done with stations monitored by the National Oceanic and Atmospheric Administration (NOAA). ADSEPL has installed and is operating a weather station at the site, data was not used from it for Audits. Weather data for the October 2, 9, and 17 audits was collected from Weather Bug due to the Government Shutdown NOAA was unavailable.

Poor weather conditions have an impact on all landfills, ADSEPL is no exception; daily cover is a mix of auto-fluff, foundry sands, construction/demolition wastes (C&D), site soils, and landfill direct soil. Extended poor weather conditions can have an affect on daily and intermediate cover. Dry weather conversely, can have an impact on gas collection and destruction.

Though no odor complaints were made, weather conditions aid in the identification of potential odor sources, trail paths, and travel times.

Equipment used in Landfill Operation

ADSEPL had one compactor and two bulldozers in operation on the working face of the landfill for the majority of audits. The facility acquired a new compactor in 2013, which is the predominant equipment used, the older compactor is kept on site as a backup. The site operated throughout 2013 with appropriate equipment as defined by the Plan of Operations, a compactor was used for compaction and a bulldozer to place daily cover. During periods of high soil volumes across the scale, or recovering soil previously tipped in Phases 2 & 3 ADSEPL implemented more dozers and had as many as three operating at one time. David Greier is an equipment operator and operated equipment during 2013.

ADSEPL also made use of excavators and haul trucks (articulated dump truck) to excavate future expansion space and stock piles to provide intermediate cover to the active area. In 2010, ADSEPL added a grader to its fleet; to maintain the soil based roads and active area access roads; this has made a noticeable improvement in unpaved roads about the site and the roads to the working face. One water truck was available and used during dry dusty conditions. Another water truck is dedicated to leachate hauling, leachate from the Future Parkland Facility was collected in the dedicated truck and used in recirculation at ADSEPL.

Equipment does require maintenance and at times does fail, there were no recorded incidents of the site not having suitable equipment active to conduction operational activities. The site mechanic position, terminated in 2012, has not been filled; all equipment repairs are done by third party or minor work by the operations manager.

In cold weather, frozen conditions the site excavator is used to dig out frozen loads. In previous years the backhoe has been dedicated to this purpose.

The ADSEPL facility does not possess a street sweeper, however they have maintained a contract with a sweeping company to sweep US 45, and site roads as ADSEPL requires. The sweeping events do not occur every week, however there were no Action Items pertaining to road conditions; though three occurrences of tracking or road debris were recorded; two of which were recorded pertaining to the site entrance only. ADSEPL addresses street sweeping as far North as the intersection of US 45 and Loomis Road.

Working Face

ADSEPL maintains a working face that is approximately one half (½) acre in size or smaller, waste volumes through out Wisconsin are at an all time low, lower volume equates to smaller working faces. Weather conditions impact the working face size as well; during inclement weather the working face would be smaller. ADSEPL operated a smaller and smaller working face as the filling of Phase 7 continued, eventually bridging phases 3 – 7.

The site operates two working faces, one specifically for soils¹ and the other for all other wastes².

The soils working face has been located on top of Phases 2 & 3 for more than a two years. The bio soil pile is in active remediation for future use on the site. The Municipal Solid Waste (MSW) working face has been on top of Phase 7, with overlay onto Phases 3, 4, 5, & 6.

Asbestos and liquid loads are tipped in designated pits, within the MSW working face until filled and a new pit is established.

The construction of the base and control berms of Phase 7B was begun in June of 2013 and completed by the end of the year. This is not the complete construction of the final footprint as there is no constructed side slope liner or containment on the South and West face/slope.

The volume of landfill direct soils was not as great in 2013 as it had been in 2012. The material was received in Phase 2 & 3. The material in Phase 7 was excavated for daily cover as when auto-fluff was not available or in reduced volume, this allowed some airspace recovery for additional waste placement in Phase 7.

Cover conditions were maintained with the same quality that had been in noted at the end of 2012. The cover conditions were never an issue during an audit.

Cover Material

The daily cover used by ADSEPL consists of auto-fluff, foundry sands, C&D, on-site soils, and landfill direct soils received during the year. Though auto-fluff shortages did occur during 2013, abundant soils prevented any decline in cover conditions. The operations manager employed the use of select C&D materials as the first “layer” of daily cover, providing a structure to hold and interlock with auto-fluff and soils in the second “layer” of daily cover. Intermediate cover

1 Separated into bio and landfill direct

2 Municipal Solid Waste, Construction and Demolitions Wastes, and Liquid Wastes

requirements were all met and after the start of construction, site soils were available to improve cover on the West slope of Phase 6 and slopes of the active area.

Leachate Management

ADSEPL has the ability to recirculate leachate through a pipe system, buried in the waste, along with disposing of excess volumes through a MMSD force main. Relative leachate volumes and repairs to the leachate system were recorded through out 2013 along with the placement of new recirculation lines. The recirculation of leachate during 2013 was minimal, with sporadic recirculation at the start of the year and no recirculation at all since May. The leachate collected from Future Parkland and any leachate collected in the 20,000 gallon containment tank is delivered by tanker to the working face liquid waste pit. Prior to 2013 the site maintained a flow control that limited leachate discharge to approximately 30,000 gallons per day. Currently, the site is mechanically restricted to no more than 70,000 gallons per day and managed to discharge just over nine million gallons to MMSD.

Leachate volumes were impacted by the construction and operation of Phase 7. The leachate collection system spent seven months exposed so that all water that fell on the the Cell footprint was collected and treated as leachate. The leachate generation was reduced when the side slopes of the advancing cell were covered with soil and extended over the leachate collection system.

There was one Action Item concerning Leachate on May 9, 2013; leachate seep at the rain flap on the South berm of Phase 7. It was addressed by pumping and completed on June 6, 2013. There was a great deal of leachate to remove and the temporary basin to drain and clean.

Gas Monitoring & Management System

ADSEPL operates a flare to destruct landfill gas (LFG) collected at the site. In 2012, ADSEPL completed the construction of the "Gas Building". The new facility at the site prepares the landfill gas(LFG) for distribution to MMSD via a pipeline. To make the gas usable at the target end of the pipeline, it must be cleaned, dried, and compressed. The facility removes the impurities from the LFG so that the pipeline is only carrying Methane. The construction of the facility included the relocation of the flare for destruction of the gas when the pipeline is not in use and an enclosed flare that is used to destruct contaminants.

During the majority of audits, JSA recorded that the facility was not delivering gas to MMSD. Based on documents reviewed regarding gas delivery, it would appear that audits were consistent with shutdown, but gas was being regularly delivered when JSA was not available to record it.

There were no action items for Gas Monitoring & Management

Surface Water Management

ADSEPL maintains three drainage basins and one temporary basin³ along with several thousand feet of conveyances. The conveyances were maintained throughout the year, basin cleaning began at the end of 2012 and some completion in 2013. Basin 1 has not been cleaned, but the supporting conveyances have.

JSA records erosion conditions under stormwater management. Closure Area III received additional soils and some armoring in 2013. The junction between Closure Area III and the uncapped portion of Phase 5 was similarly treated to repair erosion. Additionally, soils were added to the junction of Phase 5 and 6 along with the West slope of Phase 6. There were no erosion issues at the end of 2013.

ADSEPL has not met the requirements of the City of Muskego Chapter 35 Stormwater Ordinance.

There were no action items for Surface Water Management

Odor Control

Auditors record the presence of off site and on site odors; in 2013 there were no occurrences of off site odors and Fifteen on site odors. There were no odor complaints recorded in 2013. The majority of on site odors were the detection of LFG odors along the toe of Phase 5/6 and along the access road to Phase 7. There were odors of fresh garbage above within the vicinity of the active area. One specific instance was the smell of diesel fuel from bio-soils and another was the “odor additive” about the Gas Building, neither odor was encountered at later audits.

ADSEPL did not implement any odor control activities or substances in 2013 other than placement of cover. ADSEPL does possess products for odor neutralizing

There were no action items for Odor Control.

3 Excavation along South and West slope of Phase 7

Special Waste Handling

Waste profiles, sampling, and protocols are done off site from the ADSEPL Facility. This item remains on the audit should a new waste be accepted. ADSEPL receives liquid wastes; date and volume of loads were recorded on the Audit Forms.

There were no action items for Special Waste Handling

Litter Control

ADSEPL implements two types of litter fences about the active area. Stationary fences are installed at the top of slopes and at the base of slopes and where possible prior to the boundary or perimeter fences. Mobil fences are moved by bulldozer to intercept litter blown by the wind. ADSEPL also hires litter pickers to gather litter both on and off site.

The mobile fencing was used in the active area throughout 2013 and several sections were in permanent use along the top of Phase 4 to prevent litter from blowing to the East. Off site litter is recorded, if present, during an audit. If the litter is present in the subsequent audit an Action Item is issued. Litter was recorded off site on three occasions; the site employs two pickers daily and on Friday one picker operates the Residential Drop-off. Additional pickers are hired when needed, though in December of 2013 additional pickers were not available when temperatures were below zero.

No Action Items were recorded in regard to litter

Vehicle Impacts

ADSEPL sweeps US 45 when required by road conditions. When sweeping is done, ADSEPL sweeps as far North as the intersection of US 45 and Loomis Road to address concerns by the residents along that stretch and motorists. ADSEPL also enforces sweeping to be done by the second party excavators during back hauls and clay removals.

There were no action items relating to Vehicle Impacts

Inspection of incoming waste

ADSEPL uses a camera, viewable by the scale operator in addition to recording manifests, to monitor both truck activities and contents. Each equipment operator on the working face is able to observe the waste components when tipped from the haul vehicles. ADSEPL does not make use of spotters nor does it have working faces that are not monitored by ADSEPL staff.

All Wisconsin permitted landfills are required to perform a random load inspection for every 5,000 tons of waste received; the Host Agreement requires a minimum of two Random Load Inspections per week. The random load inspections were routinely performed once per week throughout 2013, a minimum of two was not always conducted.

No Action Items were recorded regarding Inspection of incoming waste.

Rejected Loads

No rejected loads were recorded in 2013

Contractors Audit

In 2013 ADSEPL engaged the services of Oaks, Mueller Excavating, Terra, and SweepAll to aid in the construction and maintenance at the site. The activities of all contractors were recorded during audits.

Landfill Expansion Phase 7

Construction of Phase 7 was not completed in 2011, however the DNR did provide approval to fill the available completed area. ADSEPL has two sides of the Phase to complete along with the construction of additional stormwater structures and conveyances. This construction was to occur and be completed in 2013.

The construction of 2013 extended the foot print of the base of Phase 7. The new constructed liner connects to the liner of Phase 7 to the North and Phase 6 to the East. A larger temporary sedimentation basin was constructed, but no permanent stormwater system structures were constructed or implemented. Additionally, the berm along the West edge of the shooting range has not been repaired, but is on the schedule for spring of 2014.

There did not appear to be much communication between the expansion construction management and the landfill site management. The site management was unaware of construction scheduling and unable to provide information to JSA.. The construction management was unaware of any sharing requirements with JSA and much of the construction activity was accomplished without being audited. The issues were raised and addressed at the October Committee meeting.

The Construction Documentation Report was submitted in January of 2014, its review is not complete, however it appears that a great deal of information was not shared during the construction activities, particularly dates and times of construction activities not in compliance with landfill operational times.

Action Items

There were two Action Items in 2013 regard. One in May regarding a leachate seep from Phase 7 and the other in July pertaining to an unmanned gate. Both Action Items were addressed in a timely manner.

ADSEPL has not completed a Chapter 35 Stormwater Permit application or the required Stormwater Maintenance

Audits in 2014

JSA will continue to conduct audits in 2014



**Advanced
Disposal**

January



MEMORANDUM

VEOLIA Emerald Park Landfill Audit Summary

TO: Veolia Emerald Park Landfill Standing Committee, City of Muskego
FROM: Anna Krajcik
COPIES: File
DATE: 01/05/13
PROJECT NUMBER: 1012.10030

Attached is the audit report for activities at the Veolia Emerald Park Landfill for the week of December 31, 2012. The audit was performed at 1:53 pm on **January 3, 2013** by Jo Spear Jr. in the presence of Dean Driggett.

The following conditions were noted during this Audit of the VEPL Facility:

- Working face in Phase 7 at west edge receiving MSW and special wastes; no soils this week.
 - Backhoe and/or excavator digging out frozen loads.
 - Autofluff stockpiles in use
- Discharge to MMSD
- One flare and one blower in operation,
 - Numerous shutdowns for gas building work, new knockout pot installed
 - Vegetation snow covered,
- One storm event since last audit, ~1"
 - Small snowfall volume, surface water frozen
 - Basins all frozen, cleaning not yet engaged
- No on or off site odors
- No special waste handling noted
- Low winds and cold conditions reducing litter
- US 45 and 8 Mile Rd clean, including turn lanes
- Tipping scale camera and equipment operators inspecting waste
 - Random load date not available for this audit, ~1200tpd
- Gas building connection to MMSD scheduled for end of week
- South ditch cleaning and new culvert installation ongoing

Attachments:
Action Items List / Landfill Operations Audit Form
Audit Photos

VEOLIA EMERALD PARK LANDFILL
 LANDFILL OPERATIONS AUDIT FORM
 CITY OF MUSKEGO

PROJECT NO. 1020.10030

DATE January 3, 2013
 Auditor on site at: Open Close

TIME 1:53 pm

WEATHER Overcast, high clouds, with some sun

WIND W 0-10

TEMP Maximum 28 °F Minimum 17 °F

B.P. 30.11

MAJOR EQUIPMENT USED IN LANDFILL OPERATIONS

No.	DESCRIPTION	Rented	Contracted	No.	DESCRIPTION	Rented	Contracted
1	Compactor						
2	Dozer						
1	Excavator						
	Haul Truck						
	Water Truck						
	Sweeper						
1	Backhoe						

MAJOR EQUIPMENT BONEYARD

No.	DESCRIPTION	Broken	Maintenance	No.	DESCRIPTION	Broken	Maintenance

A. Working Face Size and Location:

Backhoe and/or excavator digging out frozen loads. Working face only in Phase 7 at West edge receiving MSW & Special wastes. No site this week.



Cover Material:

Autopluff stock piles in use

B. Leachate Management:

Discharge to MMST

C. Gas Monitoring and Management: Check appropriate box.

Flares in Operation:	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	#	1
Blowers in Operation:	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	#	1
Flare use since last audit			#	NA		
Shutdowns Since Last Audit:			#	Numerous		
Vegetation Condition:	Good	<input checked="" type="checkbox"/>	NA	<input type="checkbox"/>	Fair	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Dead	<input type="checkbox"/>		<input type="checkbox"/>

Comments:

Vegetation snow covered, New knockout pot installed, Shutdowns for Gas Building work

D. Surface Water Management:

Storm Events Since Last	#	1	Est. Volume	~14
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EFFECTS: Note condition of perimeter road, erosion control structures, erosion damage and possible storm water/waste contact locations:

Small snow fall volumes, surface waters frozen
Basins all frozen, cleaning not yet engaged

E. Odor Control:

Odors Present: Onsite Offsite

Comments:

No offsite or onsite odors

F. Special Waste Handling: storage of fingerprint samples and testing procedures

None



G. Litter Control:

Litter Present Onsite:	YES <input type="checkbox"/>	NO <input type="checkbox"/>	
Litter Present Offsite:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
Pickers Active:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#

Comments:

Low wind and cold conditions, little litter

H. Vehicle Impacts: Locations of excessive mud/dust, condition of access and public roads and control measures taken, instances of trucks on County roads.

US 45 & 8 Mile clean, including turn lanes

I. Inspection of incoming Waste:

Scale Camera Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#
Equipment Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#
Spotter:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	#
Random Load Inspection Dates:	NA for this Audit		

Comments:

~ 1,200 TPD

J. Rejected Loads:

	Date/Time	Reason for Rejection
1.		
2.		
3.		
4.		None

Comments:



L. Other Comments:

* Gas Building connection to MMSD scheduled for end of week.

* ~~South~~ South ditch cleaning & new culvert installation ongoing

Auditor's Signature: _____

Auditor's Printed Name: _____

Management Signature: _____

Management Printed Name: _____

Management Title: _____

JSA Principal Signature: _____

Date: 1/8/13

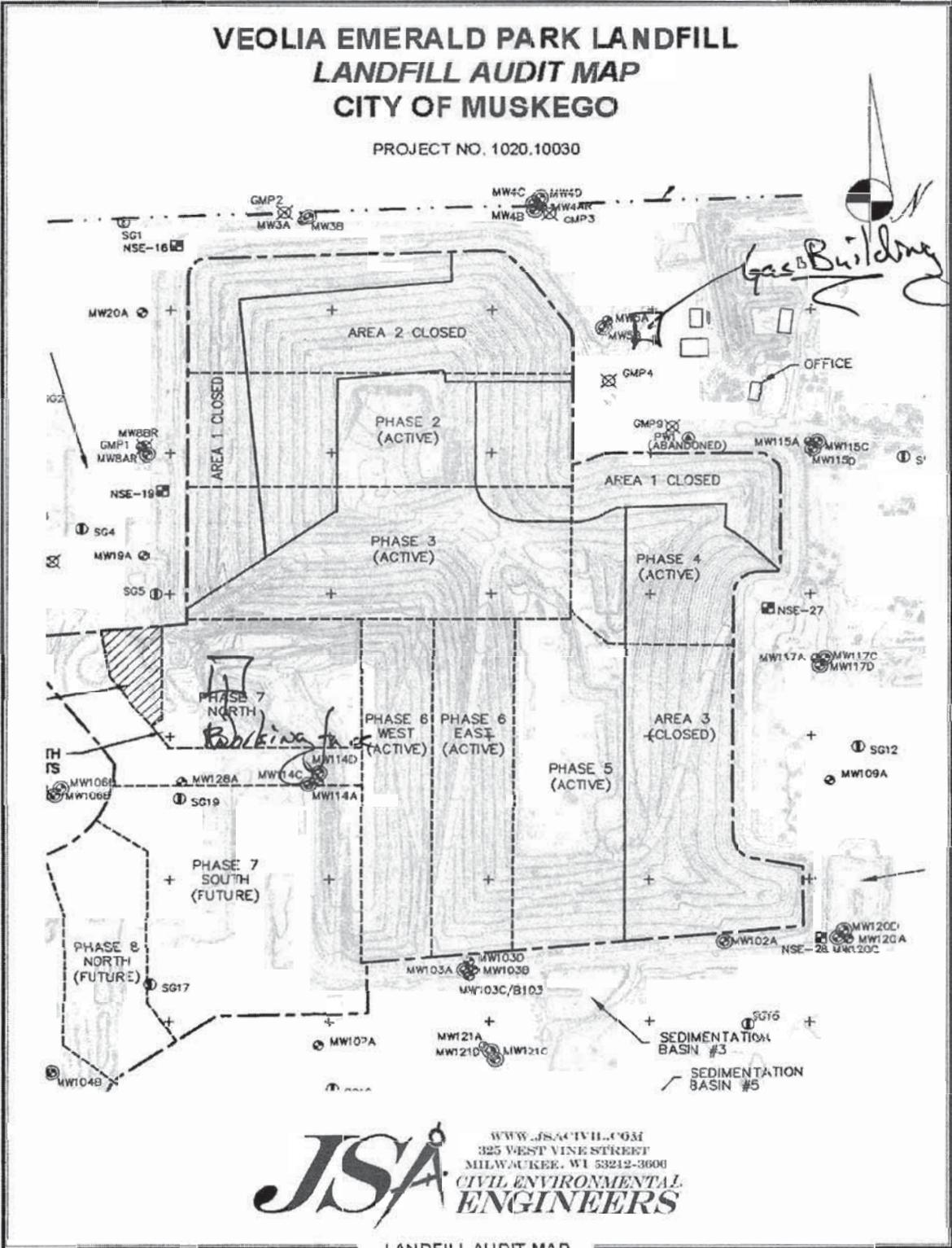
Date: 1/3/13

Date: _____



VEOLIA EMERALD PARK LANDFILL LANDFILL AUDIT MAP CITY OF MUSKEGO

PROJECT NO. 1020.10030



JSA
 WWW.JSACIVIL.COM
 325 WEST VINE STREET
 MILWAUKEE, WI 53212-3600
**CIVIL ENVIRONMENTAL
 ENGINEERS**

LANDFILL AUDIT MAP

VEOLIA Emerald Park Landfill
Action Items Checklist
City of Muskego Audit

Opened: 3/20/2012

Updated: 4/16/2012

Item Number	DATE month/date/year	Condition Description	Permit or Contract Reference	Initial Schedule for Completion	Observed Completion Date	Elapsed Time (Days)	Notes
1	3/20/2012	More than 1' of leachate head upon the liner of Phase 7	503.10(d)	ASAP	4/13/2012	24	Leachate ponding in new Cell, drained by pumping

**VEOLIA EMERALD PARK LANDFILL
AUDIT PHOTOS
CITY OF MUSKEGO**

PROJECT NO. 1012.10030



Knock out installed, backfilling during audit



Extent of frozen basin

JSA *Civil Environmental Engineers*

Environmental Engineers

325 West Vine Street
Milwaukee, Wisconsin 53212



Basin frozen



Working face and approach



South temp sed basin



Idling equipment



Active area



Working face



MEMORANDUM

VEOLIA Emerald Park Landfill Audit Summary

TO: Veolia Emerald Park Landfill Standing Committee, City of Muskego

FROM: Anna Krajcik

COPIES: File

DATE: 01/21/13

PROJECT NUMBER: 1012.10030

Attached is the audit report for activities at the Veolia Emerald Park Landfill for the week of January 7, 2013. The audit was performed at 1:53 pm on **January 11, 2013** by Jo Spear Jr. in the presence of Dean Driggett.

The following conditions were noted during this Audit of the VEPL Facility:

- Working face in northwest portion of Phase 7 receiving all waste
 - New access road planned as lift moves across from west to east
 - Autofluff and previously tipped soils recovered from Phase 3 slope
- Discharge to MMSD
- One flare and one blower in operation,
 - One shutdown to control system connections
 - Gas system and lines to MMSD charged but not used at MMSD yet
 - Vegetation snow covered,
- One storm event since last audit, ~1"
 - Basins thawing, site surface water flowing in all ditches
- No on or off site odors
- No special waste handling noted
- Some litter onsite, wet litter clinging to slopes, 3 pickers active
- US 45 has tracking and 8 Mile Rd clean, site roads gritty
 - SweepAll active on 01/10/2013
- Tipping scale camera and equipment operators inspecting waste
 - Random load date 01/11/2013, ~1200tpd
- Minor rills on Closure Area III from thaw and rain, discharge from toe drains no longer discolored
- E-Waste box 2/3rd full
- Basin cleaning set back due to thaw
- Temp sediment basin pipeline being relocated for draining basin

Attachments:

Action Items List / Landfill Operations Audit Form
Audit Photos

VEOLIA EMERALD PARK LANDFILL
LANDFILL OPERATIONS AUDIT FORM
CITY OF MUSKEGO

PROJECT NO. 1020.10030

DATE January 11, 2013 TIME 12:10
Auditor on site at: Open Close

WEATHER Overcast with fog setting in WIND S 10-15

TEMP Maximum 48 °F Minimum 45 °F B.P. 29.70

MAJOR EQUIPMENT USED IN LANDFILL OPERATIONS

No.	DESCRIPTION	Rented	Contracted	No.	DESCRIPTION	Rented	Contracted
1	Compactor						
2	Dozer						
1	Excavator						
	Haul Truck						
	Water Truck						
	Sweeper						

MAJOR EQUIPMENT BONEYARD

No.	DESCRIPTION	Broken	Maintenance	No.	DESCRIPTION	Broken	Maintenance
1	Backhoe						
1	Compactor						

A. Working Face Size and Location:

Working face in Northwest portion of Phase 7
receiving all wastes. New access road
planned as liftmoves across from West
to East.



Cover Material:

Auto fluff and previously tipped soils recovered from Phase 3 slope

B. Leachate Management:

Discharge to MMSD

C. Gas Monitoring and Management: Check appropriate box.

Flares in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Blowers in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Flare use since last audit	# NA			
Shutdowns Since Last Audit:	# to control system connections			
Vegetation Condition:	Good <input type="checkbox"/>	Fair <input checked="" type="checkbox"/>	Poor <input type="checkbox"/>	Dead <input type="checkbox"/>

Comments:

Gas system and line to MMSD charged, but not used at MMSD yet

D. Surface Water Management:

Storm Events Since Last	# 1	Est. Volume	2.1"
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EFFECTS: Note condition of perimeter road, erosion control structures, erosion damage and possible storm water/waste contact locations:

Basins thawing, site surface water flowing in all ditches

E. Odor Control:

Odors Present:	Onsite <input type="checkbox"/>	Offsite <input type="checkbox"/>
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Comments: No odors

F. Special Waste Handling: storage of fingerprint samples and testing procedures

None



G. Litter Control:

Litter Present Onsite:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	
Litter Present Offsite:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
Pickers Active:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	# 3

Comments:

Wet litter blowing to slopes

H. Vehicle Impacts: Locations of excessive mud/dust, condition of access and public roads and control measures taken, instances of trucks on County roads.

USHS has tracking, Sweep all activities on 1/10/13
 8 mile clean, site roads gritty

I. Inspection of incoming Waste:

Scale Camera Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Equipment Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	3
Spotter:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	#	0
Random Load Inspection Dates:	1/11/2013			

Comments:

2,200 TPD

J. Rejected Loads:

	Date/Time	Reason for Rejection
1.		
2.		
3.		
4.		None

Comments:



L. Other Comments:

- * Minor rills on Closure Area ~~at~~ from thaw
thaw and rain, discharge from toe drains
no longer discolored
- * E-Waste box 2/3rd full.
- * Basin cleaning set back due to thaw
- * Temp sed basin pipeline being relocated
for draining basin.

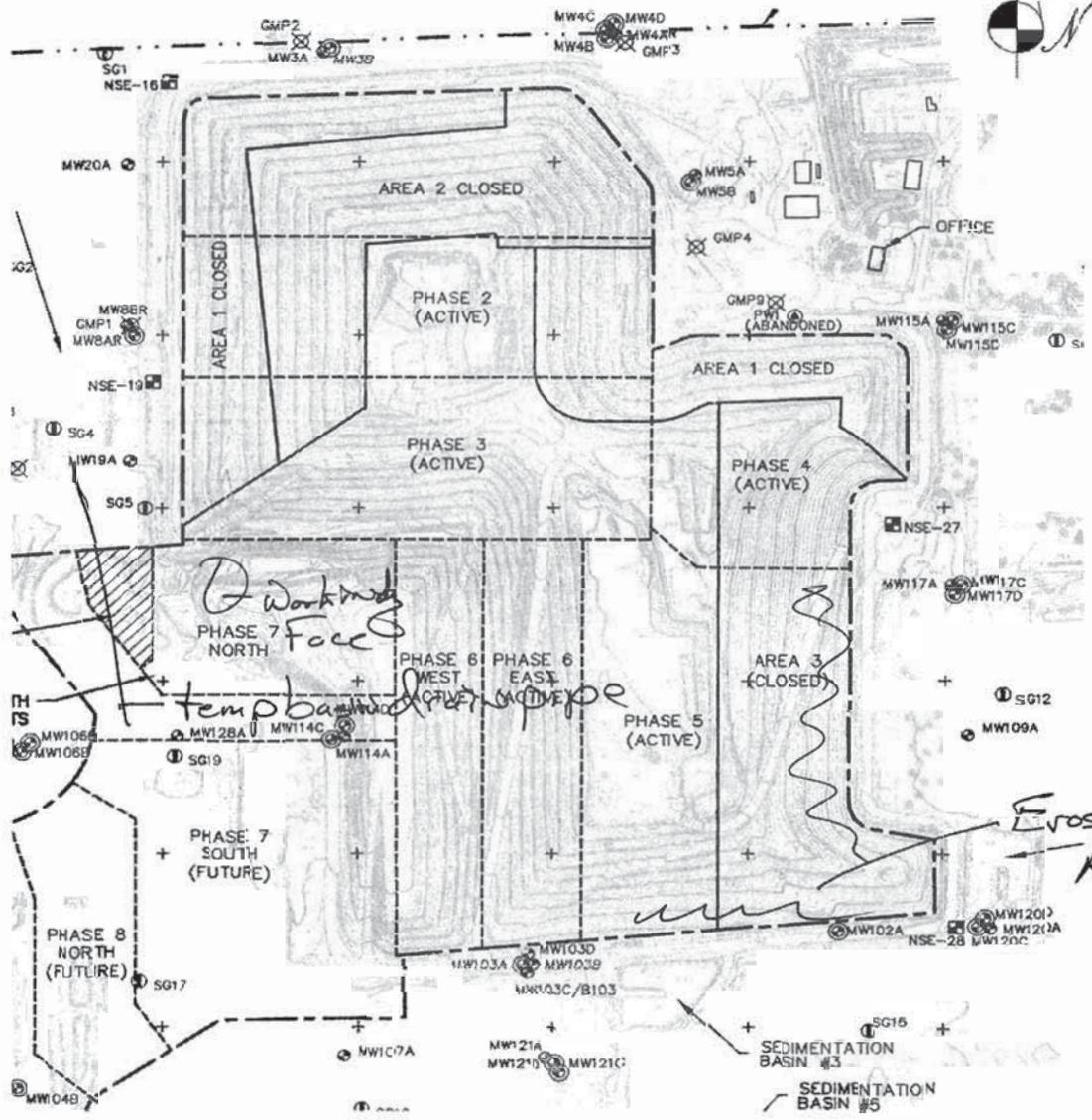
Auditor's Signature: [Signature]
Auditor's Printed Name: Joel Walter Spear, Jr
Management Signature: [Signature]
Management Printed Name: David Geier
Management Title: Operations Manager
JSA Principal Signature: _____

Date: 1/11/2013
Date: 1-11-2013
Date: _____



VEOLIA EMERALD PARK LANDFILL LANDFILL AUDIT MAP CITY OF MUSKEGO

PROJECT NO. 1020.10030




JSA
 WWW.JSACIVIL.COM
 325 WEST VINE STREET
 MILWAUKEE, WI 53212-3606
 CIVIL ENVIRONMENTAL
ENGINEERS

LANDFILL AUDIT MAP

VEOLIA Emerald Park Landfill
Action Items Checklist
City of Muskego Audit

Opened: 3/20/2012

Updated: 4/16/2012

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**VEOLIA EMERALD PARK LANDFILL
AUDIT PHOTOS
CITY OF MUSKEGO**

PROJECT NO. 1012.10030



Knock out installed, backfilling during audit



Extent of frozen basin

JSA *Civil Environmental Engineers*

Environmental Engineers

325 West Vine Street
Milwaukee, Wisconsin 53212



Basin frozen



Working face and approach



MEMORANDUM

VEOLIA Emerald Park Landfill Audit Summary

TO: Veolia Emerald Park Landfill Standing Committee, City of Muskego
FROM: Anna Krajcik
COPIES: File
DATE: 01/05/13
PROJECT NUMBER: 1012.10030

Attached is the audit report for activities at the Veolia Emerald Park Landfill for the week of January 14, 2013. The audit was performed at 2:07 pm on **January 16, 2013** by Jo Spear Jr. in the presence of David Geier.

The following conditions were noted during this Audit of the VEPL Facility:

- Working face approaching southeast corner of Phase 7
 - Receiving MSW and small volume soils
 - Previous cover in excellent condition
 - Autofluff and soils from previously tipped DD soils for cover
- Discharge to MMSD
- One flare and one blower in operation,
 - Gas line charged but not in use; MMSD not ready for gas
 - Glycol system has some heat issues
- One storm event since last audit, ~1"
 - Snow event and very cold conditions; basins and surface water frozen
- No off site odors; odors downwind of active area on site
- No special waste handling noted
- Litter present onsite, 2 pickers active
 - Windy conditions require 4 pickers for 1/17; litter in fences and perimeter
- US 45 cleaned recently by sweeper, including turn lanes
 - 8 Mile Road clean, site roads gritty and dry
- Tipping scale camera and equipment operators inspecting waste
 - Random load date 01/14/2013, ~1200tpd
 - Bio soils & special waste
- New Autofluff supply starting, ~1 load per week
- Blower removed from gas building for repairs
- D6 dozer has broken track
- New gate being installed in compost area
- Temp basins pumping system repaired and actively pumping down

Attachments:

Action Items List / Landfill Operations Audit Form
Audit Photos

VEOLIA EMERALD PARK LANDFILL
LANDFILL OPERATIONS AUDIT FORM
CITY OF MUSKEGO

PROJECT NO. 1020.10030

DATE January 16, 2013 TIME 2:07
Auditor on site at: Open Close

WEATHER Overcast, brisk, low humidity WIND SW - 20-35

TEMP Maximum 32 °F Minimum 23 °F B.P. 27.78

MAJOR EQUIPMENT USED IN LANDFILL OPERATIONS

No.	DESCRIPTION	Rented	Contracted	No.	DESCRIPTION	Rented	Contracted
1	Compactor						
1	Dozer						
1	Excavator						
	Haul Truck						
	Water Truck						
	Sweeper						

MAJOR EQUIPMENT BONEYARD

No.	DESCRIPTION	Broken	Maintenance	No.	DESCRIPTION	Broken	Maintenance
1	Backhoe		✓				
1	Dozer	✓					
1	Compactor		✓				

A. Working Face Size and Location:

Working face is approaching Southeast corner
of Phase 7. Receiving MSW and small volume
soils. Previous cover in excellent condition



Cover Material:

Auto-fluff & soils from previously tipped

DD Soils

B. Leachate Management:

Discharge to MMSD

C. Gas Monitoring and Management: Check appropriate box.

Flares in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Blowers in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Flare use since last audit			#	NA
Shutdowns Since Last Audit:			#	
Vegetation Condition:	Good <input checked="" type="checkbox"/>	Fair <input type="checkbox"/>	Poor <input type="checkbox"/>	Dead <input type="checkbox"/>

Comments:

Gas line changed, but not in use. MMSD Not ready for gas

Glucal system has some heat issues

D. Surface Water Management:

Storm Events Since Last	# 1	Est. Volume	2 1/2"
-------------------------	-----	-------------	--------

EFFECTS: Note condition of perimeter road, erosion control structures, erosion damage and possible storm water/waste contact locations:

Snow event, very cold condition

Basins & Surface water frozen

E. Odor Control:

Odors Present:

Onsite <input checked="" type="checkbox"/>	Offsite <input type="checkbox"/>
--	----------------------------------

Comments:

No off site odors, onsite odors downwind of festive area

F. Special Waste Handling: storage of fingerprint samples and testing procedures

None



G. Litter Control:

Litter Present Onsite:	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	
Litter Present Offsite:	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	
Pickers Active:	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	# 2

Comments:

Windy conditions require 4 pickers for 1/17
Litter in fences & Perimeter

H. Vehicle Impacts: Locations of excessive mud/dust, condition of access and public roads and control measures taken, instances of trucks on County roads.

USHS cleaned recently by sweeper, turn lane
gritty, 8 Mile Rd. Clean.
Site roads gritty & dry

I. Inspection of incoming Waste:

Scale Camera Operator:	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	#	
Equipment Operator:	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	#	
Spotter:	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>	#	
Random Load Inspection Dates:		1/15/13				

Comments:

~ 1,200 TPD soils & special wastes down
Bio soils expected for next week

J. Rejected Loads:

	Date/Time	Reason for Rejection
1.		
2.		
3.		
4.		None

Comments:



L. Other Comments:

- * New Autocluff supply starting, ~1 load per week.
- * Blower removed from Gas Building for repairs
- * D6 Dozer has broken track
- * New gate being installed in Compost Area
- * ~~Be~~ Temp Basin Pump system repaired and actively pumping down

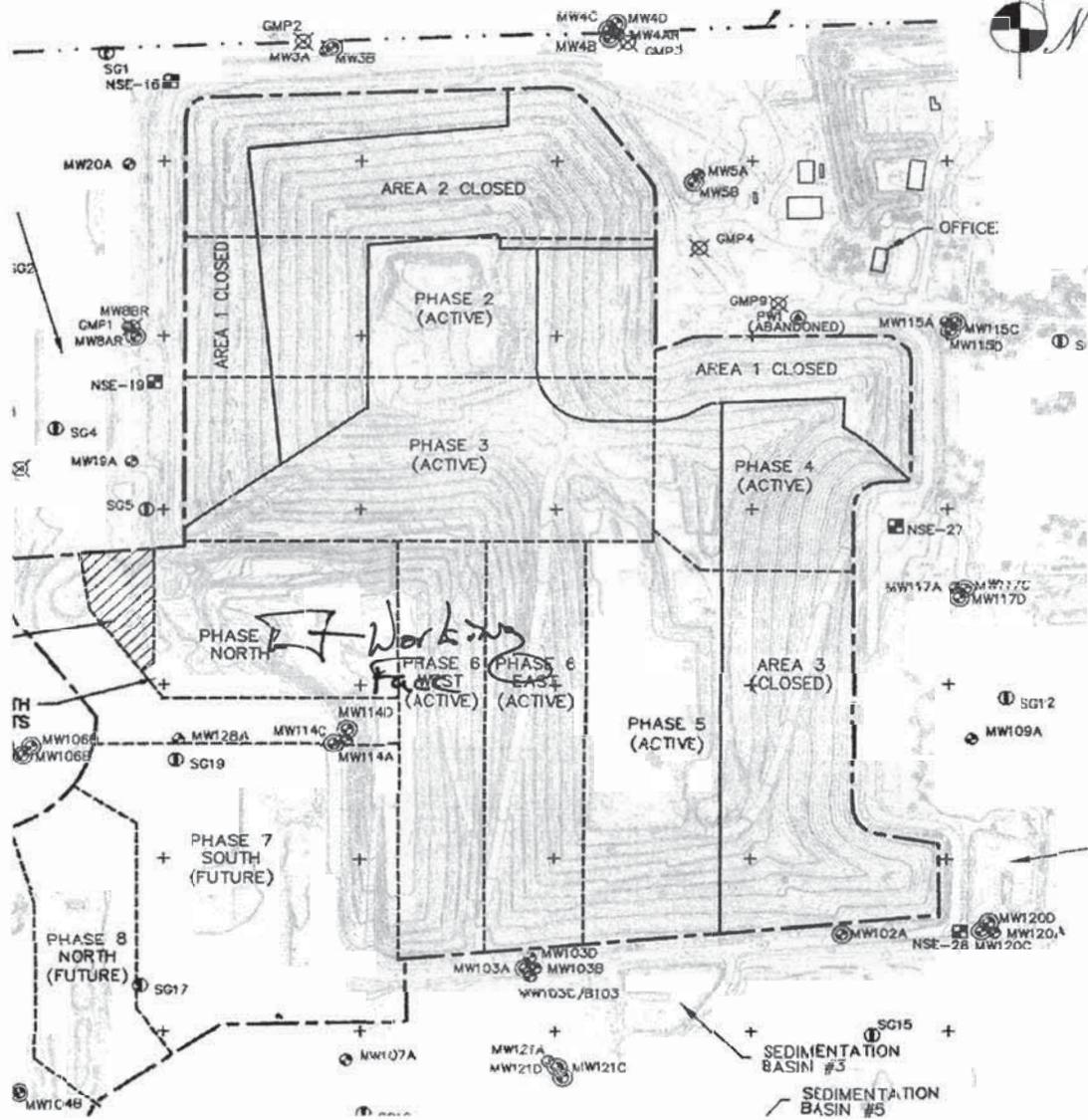
Auditor's Signature: [Signature]
Auditor's Printed Name: Jo-Walter Spear, Jr
Management Signature: [Signature]
Management Printed Name: David Coeler
Management Title: Operations Manager
JSA Principal Signature: _____

Date: 1/16/13
Date: 1-16-13
Date: _____



VEOLIA EMERALD PARK LANDFILL LANDFILL AUDIT MAP CITY OF MUSKEGO

PROJECT NO. 1020.10030




JSA
 WWW.JSACIVIL.COM
 125 WEST VINE STREET
 MILWAUKEE, WI 53212-3600
 CIVIL ENVIRONMENTAL
 ENGINEERS

LANDFILL AUDIT MAP

VEOLIA Emerald Park Landfill
Action Items Checklist
City of Muskego Audit

Opened: 3/20/2012

Updated: 4/16/2012

Item Number	DATE month/date/year	Condition Description	Permit or Contract Reference	Initial Schedule for Completion	Observed Completion Date	Elapsed Time (Days)	Notes
1	3/20/2012	More than 1' of leachate head upon the liner of Phase 7	503.10(d)	ASAP	4/13/2012	24	Leachate ponding in new Cell, drained by pumping

**VEOLIA EMERALD PARK LANDFILL
AUDIT PHOTOS
CITY OF MUSKEGO**

PROJECT NO. 1012.10030



Previously tipped soils being cut and used for intermediate cover



Active area

JSA *Civil Environmental Engineers*

Environmental Engineers

325 West Vine Street
Milwaukee, Wisconsin 53212



Compactor in action



D6 Dozer with broken track



Excavator digging out frozen loads while backhoe is in for repairs



Basin being drained by pump, surface only is frozen



Uprights for new gate into Compost area from the South



MEMORANDUM

VEOLIA Emerald Park Landfill Audit Summary

TO: Veolia Emerald Park Landfill Standing Committee, City of Muskego
FROM: Anna Krajcik
COPIES: File
DATE: 01/30/13
PROJECT NUMBER: 1012.10030

Attached is the audit report for activities at the Veolia Emerald Park Landfill for the week of January 21, 2013. The audit was performed at 3:20 pm on **January 24, 2013** by Jo Spear Jr. in the presence of David Geier.

The following conditions were noted during this Audit of the VEPL Facility:

- Working face at southeast corner of Phase 7
 - Tipping above and below working face
 - Additional ramps being constructed, Phase 3 receiving biosoils
 - Soils and Autofluff being used as cover
- MMSD receiving leachate, no recirculation going
- One flare and one blower in operation,
 - Used emergency flare while regular flare was down, MMSD not receiving LFG
- One storm event since last audit
 - Small snow event this week, all surface water frozen
- No off site odors; odors downwind of active area on site
- No special waste handling noted
- Litter onsite in trees and fences
- US 45 and 8 Mile Road dry and getting dusty, site roads dusty
- Tipping scale camera and equipment operators inspecting waste
 - Random load date 01/18/2013, ~1253 tpd
- Equipment problems due to cold weather on 1/22, all equipment running now
- Autofluff volumes increasing for cover use
- Gas system awaiting MMSD

Attachments:
Action Items List / Landfill Operations Audit Form
Audit Photos

VEOLIA EMERALD PARK LANDFILL
 LANDFILL OPERATIONS AUDIT FORM
 CITY OF MUSKEGO

PROJECT NO. 1020.10030

DATE January 24, 2013 TIME 3:20
 Auditor on site at: Open Close

WEATHER Grey skies, high clouds, possible snow WIND N:1

TEMP Maximum 17 °F Minimum 11 °F B.P. 30.60

MAJOR EQUIPMENT USED IN LANDFILL OPERATIONS

No.	DESCRIPTION	Rented	Contracted	No.	DESCRIPTION	Rented	Contracted
<u>1</u>	Compactor						
<u>2</u>	Dozer						
<u>1</u>	Excavator						
<u>1</u>	Haul Truck						
	Water Truck						
	Sweeper						

MAJOR EQUIPMENT BONEYARD

No.	DESCRIPTION	Broken	Maintenance	No.	DESCRIPTION	Broken	Maintenance

A. Working Face Size and Location:

Working face at Southeast corner of Phase 7.
Tipping above and below working face. Additional
ramps being constructed
Phase 3 receiving bio soils



Cover Material:

Soils & Auto-fluff being used as cover

B. Leachate Management:

MMSD receiving leachate, no recirculating

C. Gas Monitoring and Management: Check appropriate box.

Flares in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Blowers in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Flare use since last audit	#		NA	
Shutdowns Since Last Audit:	#		NA	
Vegetation Condition:	Good <input checked="" type="checkbox"/>	Fair <input type="checkbox"/>	Poor <input type="checkbox"/>	Dead <input type="checkbox"/>

Comments:

Used emergency flare while regular flare was down
MMSD not yet receiving LFG

D. Surface Water Management:

Storm Events Since Last	# 1	Est. Volume	~
-------------------------	-----	-------------	---

EFFECTS: Note condition of perimeter road, erosion control structures, erosion damage and possible storm water/waste contact locations:

Small road event this week. All surface water frozen

E. Odor Control:

Odors Present: Onsite Offsite

Comments: No odors on or off site

F. Special Waste Handling: storage of fingerprint samples and testing procedures

None



G. Litter Control:

Litter Present Onsite:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	
Litter Present Offsite:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
Pickers Active:	YES <input type="checkbox"/>	NO <input type="checkbox"/>	#

Comments:

Litter onsite, in trees & fences

H. Vehicle Impacts: Locations of excessive mud/dust, condition of access and public roads and control measures taken, instances of trucks on County roads.

US 45 & 8 Mile dr, getting dusty.
Site roads dusty

I. Inspection of incoming Waste:

Scale Camera Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#
Equipment Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#
Spotter:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	#
Random Load Inspection Dates:	1/18/13		

Comments:

~ 1,253 TPD
Bio Soils being received as well as MSD

J. Rejected Loads:

	Date/Time	Reason for Rejection
1.		None
2.		
3.		
4.		

Comments:



L. Other Comments:

- * Equipment problems due to cold on 1/22, all equipment running now
- * Auto fluff volumes increasing for cover use
- * Gas system awaiting from MMSD.

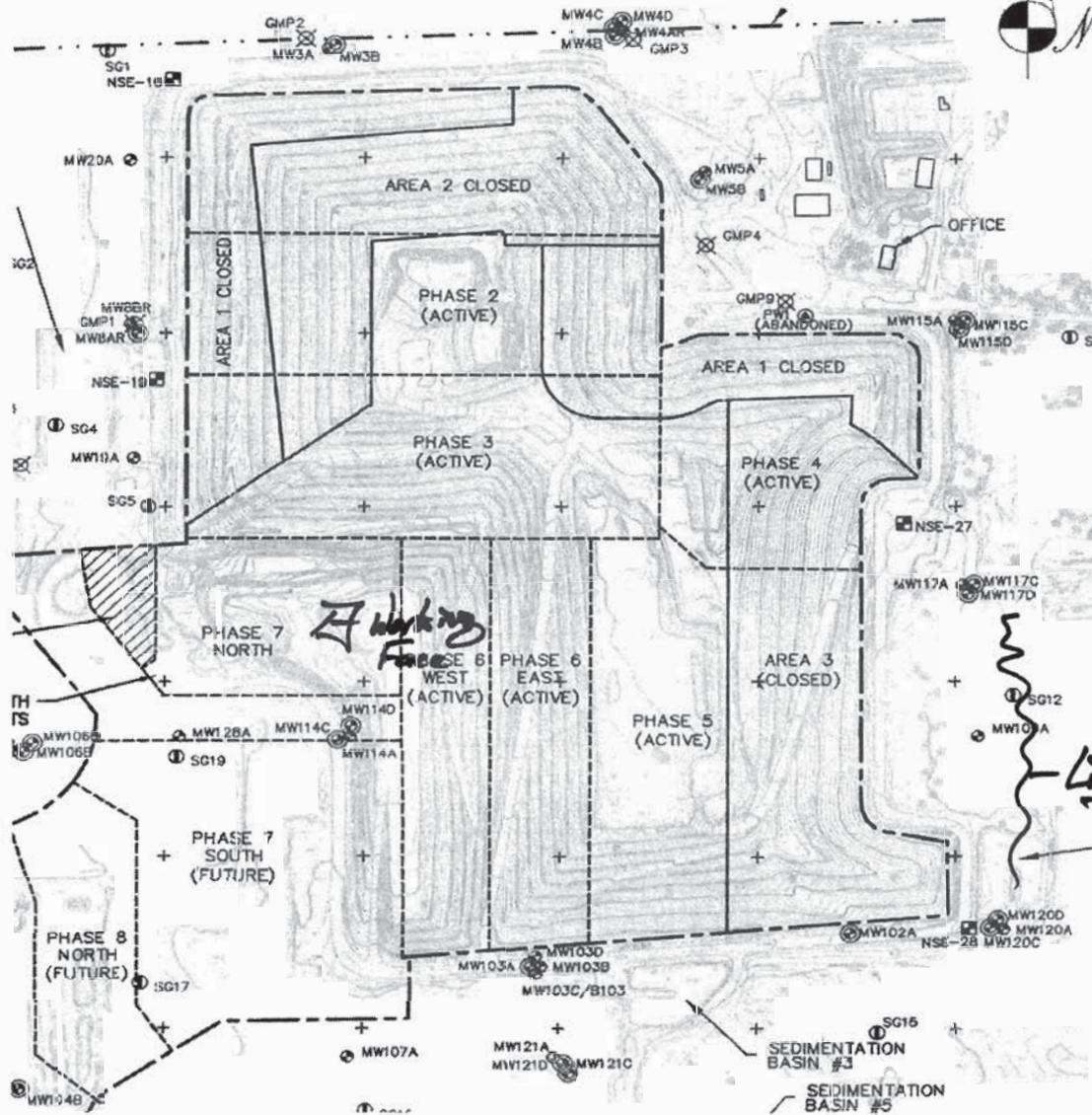
Auditor's Signature: [Signature]
Auditor's Printed Name: Michael Walters, P.E.
Management Signature: [Signature]
Management Printed Name: David Coeist
Management Title: Operations Manager
JSA Principal Signature: _____

Date: 1/27/13
Date: 1/29/13
Date: _____



VEOLIA EMERALD PARK LANDFILL LANDFILL AUDIT MAP CITY OF MUSKEGO

PROJECT NO. 1020.10030




JSA
 WWW.JSACIVIL.COM
 325 WEST VINE STREET
 MILWAUKEE, WI 53212-3006
 CIVIL ENVIRONMENTAL
 ENGINEERS

LANDFILL AUDIT MAP

VEOLIA Emerald Park Landfill
Action Items Checklist
City of Muskego Audit

Opened: 3/20/2012

Updated: 4/16/2012

Item Number	DATE month/date/year	Condition Description	Permit or Contract Reference	Initial Schedule for Completion	Observed Completion Date	Elapsed Time (Days)	Notes
1	3/20/2012	More than 1' of leachate head upon the liner of Phase 7	503.10(d)	ASAP	4/13/2012	24	Leachate ponding in new Cell, drained by pumping

**VEOLIA EMERALD PARK LANDFILL
AUDIT PHOTOS
CITY OF MUSKEGO**

PROJECT NO. 1012.10030



Bio soils being received in Phase 3



Active area and ramp construction

JSA *Civil Environmental Engineers*

Environmental Engineers

325 West Vine Street
Milwaukee, Wisconsin 53212



Active Area, new ramp construction to right



Active area



Waste packed in place, prior to cover



Working face at outboard slope, shaped and compacted by dozer



Temp basin drained of flowing water, ice and snow remain



**Advanced
Disposal**

February



MEMORANDUM

VEOLIA Emerald Park Landfill Audit Summary

TO: Veolia Emerald Park Landfill Standing Committee, City of Muskego
FROM: Anna Krajcik
COPIES: File
DATE: 01/30/13
PROJECT NUMBER: 1012.10030

Attached is the audit report for activities at the Veolia Emerald Park Landfill for the week of January 28, 2013. The audit was performed at 1:45 pm on **February 1, 2013** by Jo Spear Jr. in the presence of David Geier.

The following conditions were noted during this Audit of the VEPL Facility:

- Working face for MSW in Phase 7 Northeast corner
 - New access ramp in southeast corner as well
 - Biosoils being received in Phase 2 & 3
 - Autofluff in use for cover, previous covers of soil
- Leachate discharge to MMSD
- One flare and one blower in operation,
 - Currently not pushing gas to MMSD
- Three storm events since last audit, ~3"
 - Minor snowfall this week, heavy rains over weekend 1/28 causing runoff to enter temporary sediment pond.
- No on or off site odors
- No special waste handling noted
- Minor litter on site, heaver in fences, one picker active
- US 45 and 8 Mile Road clean
 - Left turn lanes have ice and debris, side roads dusty
- Tipping scale camera and equipment operators inspecting waste
 - Random load date 02/01/2013, ~1300 tpd
- Temp sediment basin cleanup ongoing
 - frozen conditions slowed liquids removal, no threat to the public
 - Temp sediment basin impacted in the eastern most and is not hydraulically connected to larger basin
- Current lift finishing in tight areas, new ramps will be in construction and removed as lift continues.

Attachments:
Action Items List / Landfill Operations Audit Form
Audit Photos

91.
919.

VEOLIA EMERALD PARK LANDFILL
LANDFILL OPERATIONS AUDIT FORM
CITY OF MUSKEGO

PROJECT NO. 1020.10030

DATE February 1, 2013
Auditor on site at: Open Close

TIME 1:45 PM

WEATHER Clear skies frigid

WIND S 10-25

TEMP Maximum 2 °F Minimum -17 °F

B.P. 30.28

MAJOR EQUIPMENT USED IN LANDFILL OPERATIONS

No.	DESCRIPTION	Rented	Contracted	No.	DESCRIPTION	Rented	Contracted
1	Compactor						
1	Dozer						
1	Excavator						
	Haul Truck						
	Water Truck						
	Sweeper						

MAJOR EQUIPMENT BONEYARD

No.	DESCRIPTION	Broken	Maintenance	No.	DESCRIPTION	Broken	Maintenance

A. Working Face Size and Location:

Working face for MSW in Phase 7 North east corner. New access ramp in South east corner.

Bro Soils being received in Phase 2 1/3



Cover Material:

Auto-luff in use for cover, previous covers of soil

B. Leachate Management:

Leachate discharge to MMSD

C. Gas Monitoring and Management: Check appropriate box.

Flares in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Blowers in Operation:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	1
Flare use since last audit	#		NA	
Shutdowns Since Last Audit:	#		NA	
Vegetation Condition:	Good <input type="checkbox"/>	Fair <input type="checkbox"/>	Poor <input type="checkbox"/>	Dead <input type="checkbox"/>

Comments:

Currently not pushing gas to MMSD

D. Surface Water Management:

Storm Events Since Last	# 3	Est. Volume	2.8"
-------------------------	-----	-------------	------

EFFECTS: Note condition of perimeter road, erosion control structures, erosion damage and possible storm water/waste contact locations:

Minor snowfall this week, heavy rains over weekend 4/1/18 causing runoff to enter temped pond.

E. Odor Control:

Odors Present: Onsite Offsite

Comments: No odors on or off site

F. Special Waste Handling: storage of fingerprint samples and testing procedures

None



G. Litter Control:

Litter Present Onsite:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	
Litter Present Offsite:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
Pickers Active:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	# 1

Comments:

Misc litter on site, heavier infenses

H. Vehicle Impacts: Locations of excessive mud/dust, condition of access and public roads and control measures taken, instances of trucks on County roads.

US45 & 8 Mile clean, left turn lanes have ice and debris, side roads dusty

I. Inspection of incoming Waste:

Scale Camera Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	
Equipment Operator:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	#	
Spotter:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	#	
Random Load Inspection Dates:	2/1/2013			

Comments:

2/1, 300 TPD

J. Rejected Loads:

	Date/Time	Reason for Rejection
1.		None
2.		
3.		
4.		

Comments:



L. Other Comments:

* Temp sed basin cleanup ongoing. frozen conditions slowed liquids removal, No threat to public. Temp Sed basin impacted is the Eastern most, Not hydraulically connected to larger basins.

* Current lift finishing in tight areas new ramps will be in construction and removal as lifts continue

Auditor's Signature: _____

Auditor's Printed Name: _____

Management Signature: _____

Management Printed Name: _____

Management Title: _____

JSA Principal Signature: _____

Date: 2/1/2013

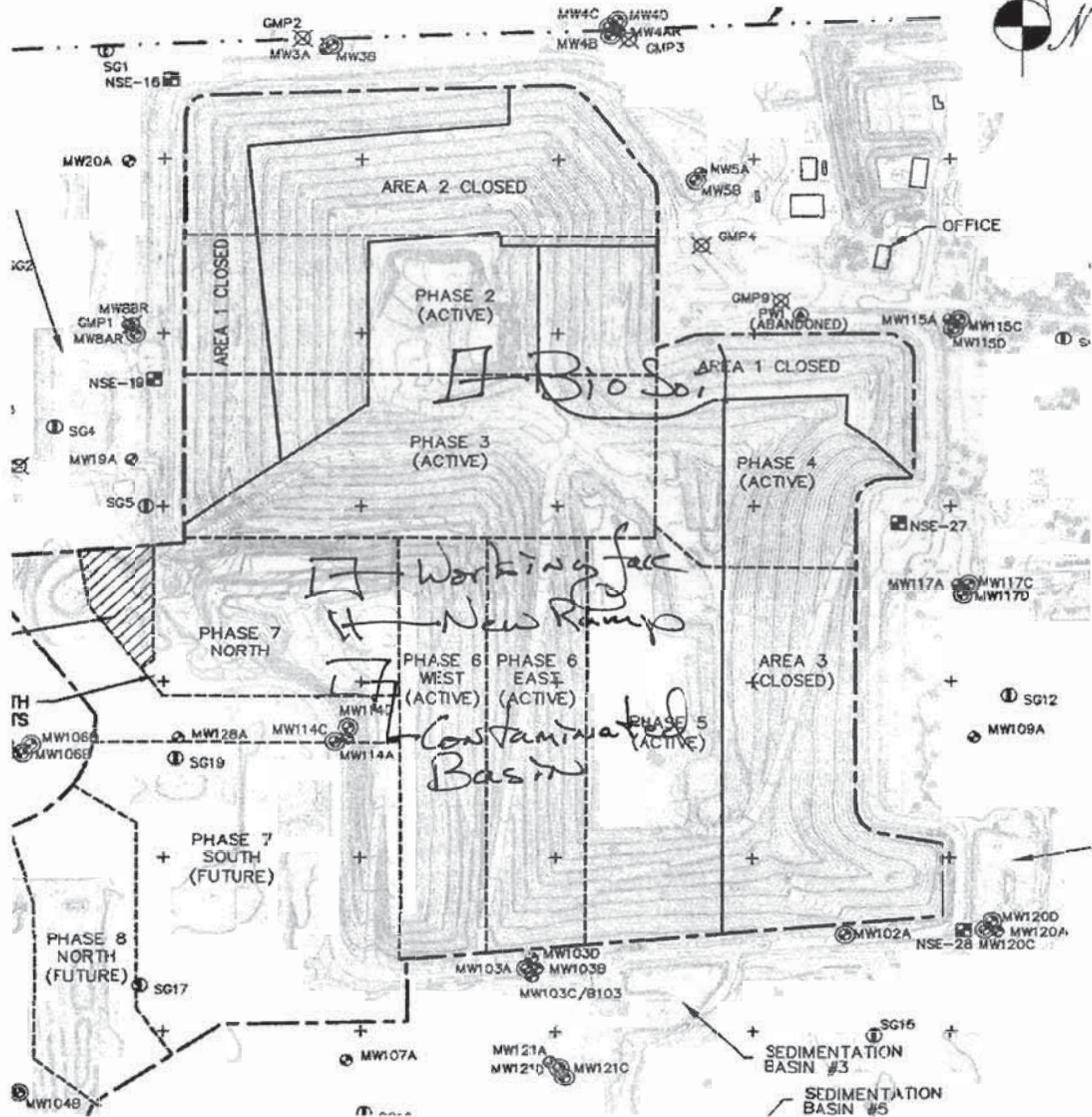
Date: 2/1/2013

Date: _____



VEOLIA EMERALD PARK LANDFILL LANDFILL AUDIT MAP CITY OF MUSKEGO

PROJECT NO. 1020.10030



JSA CIVIL ENVIRONMENTAL ENGINEERS
 WWW.JSACIVIL.COM
 325 WEST VINE STREET
 MILWAUKEE, WI 53212-3600

LANDFILL AUDIT MAP



January 31, 2013

File Ref: FID 268244130
Waukesha Co.
SW Corr.

Mr. Jay Warzinski
Advanced Disposal Services Emerald Park Landfill, LLC
W124 S10629 South 124th Street
Muskego, WI 53150

Subject: NOTICE OF NONCOMPLIANCE
Advanced Disposal Services Emerald Park Landfill (License #3290)

Dear Mr. Warzinski:

On January 29, 2013, Advanced Disposal left messages with the Department of contact water being released into an unlined area south of Phase 7 North. It appears that the landfill is in violation of state solid waste management regulations and your June 9, 2011 plan of operation.

Section NR 506.07(5)(b), Wis. Adm. Code states that any liquid which comes in contact with waste or accumulates in a portion of the landfill where active waste disposal operations are occurring shall be handled as leachate and properly treated.

On January 30, 2013, Jay Warzinski notified the Department of a release that occurred on January 29, 2013 into an unlined area south of Phase 7 North and east of Phase 6. He explained that surface water had ponded in the Phase 7 North active area and was causing problems with the waste hauling trucks. The contact water/leachate was directed to the southeast corner of the phase and it flowed into an unlined area. After the problem was identified, the leachate was pumped from the unlined area into the leachate collection system. Advanced Disposal has proposed to remove any contaminated or stained soil and will test the exposed soil for metals that appear in the leachate to confirm that all impacted soil has been removed. After the liquid and contaminated soil has been removed, Advanced Disposal will repair the area.

Please remove the leachate and contaminated soil from the unlined area as soon as possible and submit the following information to the Department by February 15, 2013:

1. Explain the circumstances that led to contact water being released to unlined areas.
2. The amount of contact water removed from the unlined area and how it was handled.
3. Determine, in cubic yards, the volume of contaminated soil needed to be removed.
4. Provide photo and written documentation of removal of all impacted soil.
5. Provide the soil test results from the soil exposed after the contaminated soil has been removed from the affected area.
6. Explain, in detail, how Advanced Disposal will prevent this situation from happening in the future.

Based on the information submitted by Advanced Disposal, the Department may require further investigation and/or remediation.

The Department considers this non-compliance to be serious. The self-reporting and immediate actions taken by Advanced Disposal personnel to limit the impacts of the leachate release, as well as Advanced Disposal's cooperation in this matter were important considerations in the Department's enforcement response decision.

If you have any questions regarding this letter please feel free to contact me at (608) 743-4845.

Sincerely,

A handwritten signature in cursive script that reads "Ann Bekta".

Ann Bekta, P.E.
Waste Management Engineer
South Central Region

cc: Frank Schultz- SER
Joe Lourigan - Sturtevant