

ENVIRONMENTAL SAMPLING CORPORATION

Dedicated to Environmental Monitoring, Science & Technology

February 28, 2020

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

**RE: Advanced Disposal Services Emerald Park Landfill
Air Pollution Control Operation Permit No: 268244130-P20
FID No. 268244130
Deviation of Permit Conditions: January 2020**

Dear Mr. Volpentesta:

On behalf of Advanced Disposal Services Emerald Park Landfill (ADS-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 Advanced Disposal Services Midwest at 414-422-9075 ext. 102 or the undersigned at 414-427-5033.

Sincerely,
Environmental Sampling Corporation



Tracy Ipavec
Sr. Environmental Specialist

Attachment

cc: Dan DeWaard: ADS-Midwest (electronic copy)
Tim Curry: ADS-Midwest (electronic copy)
Randy Frank: ADS-Midwest (electronic copy)
Anthony Militello: ADS-Midwest (electronic copy)
Kari Rabideau: ADS-Midwest (electronic copy)
Michael Hackney: ADS-EPL (electronic copy)
Scott Croft: ADS-EPL (electronic copy)
ADS-EPL File Copy
Tyler Field: Tetra Tech (electronic copy)
Jo Spear: JSA Environmental (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 Advanced Disposal Services Emerald Park Landfill	2.) FID 268244130
3.) Permit Number Operation Permit: 268244130-P20	4.) Permit Issue Date May 26, 2015
5.) Reporting Period Covered by this Deviation Report January 2020	

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><u>I.B.1.b.(1)(a),(b)</u> (1) The flare shall be operated at all times whenever the extracted landfill gas is vented through the flare. (a) The permittee shall install and operate a device to continuously record the flow rate of landfill gas vented to the flare or the flow rate of landfill gas routed to a gas treatment system that processes the collected gas for subsequent sale or use. When gas is vented to a flare, the following requirements shall be met: (b) The permittee shall install and operate a temperature monitoring and continuous recording system to ensure the flare is operating.</p> <p><u>I.B.1.b.(2)(a),(b)</u> (2) For Process P01, the permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:</p> <p><i>(Continued on Page 2)</i></p>	S01, P01 OPEN FLARE	01/14/20 03:31 – 01/14/20 07:01 (3.51 hr.)	NA	There was an incident in which the datalogger did not record flare temperature or flow to the open flare for a period of time in excess of 15-minutes.	Visual review of data	There was one period of missed open flare data records during the reporting period when the PC malfunctioned and switched to battery back-up power. The datalogger ceased operation after the battery back-up power was exhausted which resulted in missed data records. The cause of the malfunction is unknown. There was no loss of power at the facility and the gas extraction system remained in operation during this incident. The battery was replaced and the datalogger resumed normal operation. No additional action was required.

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>(a) 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.</p> <p>(b) A device that records flow to the flare. The permittee shall install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes.</p> <p style="text-align: center;"><u>Part I.ZZZ.1.b.(1)</u></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>S01, P01 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>

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;"><u>I.A.1.b.(27)(c)</u></p> <p>(c) The enclosed flare shall be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in condition I.A.1.b.(28).</p> <p style="text-align: center;"><u>I.A.1.b.(28)(a),(b)(i)</u></p> <p>(28) The permittee shall calibrate, maintain and operate according to the manufacturer’s specifications, the following equipment:</p> <p>(a) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ± 1% of the temperature being measured, expressed in degrees Celsius, or ± 0.5 degrees Celsius, whichever is greater.</p> <p>(b) A device that records flow to or bypass of the enclosed flare. The permittee shall do one of the following:</p> <p>(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.</p> <p style="text-align: center;"><u>I.A.1.c.(5)(a)</u></p> <p>(5) The permittee shall keep up-to-date, readily accessible records for the life of the control equipment of the data listed in paragraphs (a) and (b) below as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the enclosed flare (P05) vendor specifications shall be maintained until removal.</p> <p>(a) The average combustion temperature in the enclosed flare measured at least once every fifteen minutes and averaged over the same time period of the performance test.</p> <p style="text-align: center;"><i>(Continued on Page 4)</i></p>	<p>S05, P05 ENCLOSED FLARE</p>	<p>01/14/20 03:31 – 01/14/20 07:01 (3.51 hr.)</p>	<p>NA</p>	<p>There was an incident in which the datalogger did not record flare temperature or flow to the enclosed flare for a period of time in excess of 15-minutes.</p>	<p>Visual review of data</p>	<p>There was one period of missed enclosed flare data records during the reporting period when the PC malfunctioned and switched to battery back-up power. The datalogger ceased operation after the battery back-up power was exhausted which resulted in missed data records.</p> <p>The cause of the malfunction is unknown. There was no loss of power at the facility and the gas extraction system remained in operation during this incident. The battery was replaced and the datalogger resumed normal operation. No additional action was required.</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 align="center"><i>(Continued from Page 3)</i></p> <p>Part I.ZZZ.1.b.(1) (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>	S05, P05 ENCLOSED FLARE	<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>(See above)</i></p>

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

Daniel DeWaard

Typed or Printed Name of Signatory

Region Vice President – Midwest

Title

2 / 20 / 2020

Date