

ENVIRONMENTAL SAMPLING CORPORATION

Dedicated to Environmental Monitoring, Science & Technology

April 30, 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: March 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)
 Sharren 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 March 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.A.1.b.(3)(b)</u> (3) The permittee shall operate each interior wellhead in the gas collection system in the following manner: (b) Except as specified in (c) below, with either a nitrogen level less than 20 percent, or an oxygen level less than 5 percent.</p> <p><u>I.A.1.b.(14)</u> (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</p> <p><i>(Continued on Page 2)</i></p>	S02, P02 Operation of EPL	<p>Supplemental Gas Extraction Point</p> <p>LIW02 03/23/20 – present (on-going)</p>	NA	The monitored oxygen level at a supplemental gas extraction point exceeded 5% and could not be corrected within 15 days.	Visual review of data	<p>Supplemental gas extraction point LIW02 exceeded the oxygen operating level during the March 2020 monthly monitoring event and could not be brought back into compliance (i.e. less than 5% oxygen) within 15 days.</p> <p>Site personnel inspected the well components (i.e. ports, hoses, well boot, etc.) to confirm that there are no apparent above ground air leaks. When checking liquid levels, the well was found to be obstructed at a depth of 41 feet. No liquid was encountered prior to the obstruction.</p> <p>LIW02 was originally installed as an injection well for leachate recirculation. It was then used as for supplemental gas extraction. Since LIW02 is no longer used for leachate recirculation and is not providing an effective means of gas extraction due to its</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 2)</i></p> <p>measurement, the gas collection system shall be expanded or other appropriate corrective actions 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> <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>S02, 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>(Continued from Page 2)</i></p> <p>compromised condition, and the radius of influence of the surrounding gas wells overlap this extraction point, an abandonment request will be provided to the Department under separate cover. Until that time, any exceedances of the operating conditions will continue to be documented on the Air Operation Permit Deviation Summary Reports.</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

4 / 30 / 2020

Date