

ENVIRONMENTAL SAMPLING CORPORATION

Dedicated to Environmental Monitoring, Science & Technology

May 29, 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: April 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)
 Scott Croft: ADS-EPL (electronic copy)
 ADS-EPL File Copy
 Tyler Field: Tetra Tech (electronic copy)
 Jo Spear: JSA Environmental (electronic copy)
 Mark Slocum: 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 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 April 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	04/25/20 20:56 – 04/26/20 10:09 (13.22 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 due to a power outage. Power was restored and the datalogger resumed normal operation.

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>	S01, P01 OPEN FLARE	<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 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 $\pm 1\%$ 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>04/25/20 20:56 – 04/26/20 10:09 (13.22 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 due to a power outage. Power was restored and the datalogger resumed normal operation.</p>

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<p align="center"><i>(Continued from Page 3)</i></p> <p>Part I.ZZZ.1.b.(1)</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>S05, P05 ENCLOSED FLARE</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>(See above)</i></p>

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<p style="text-align: center;"><u>I.A.1.b.(3)(b)</u></p> <p>(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 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 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> <p style="text-align: center;"><i>(Continued on Page 6)</i></p>	<p>S02, P02 Operation of EPL</p>	<p>Supplemental Gas Extraction Point</p> <p style="text-align: center;">LIW02 03/23/20 – 05/08/20 (46 days to abandonment)</p>	<p>NA</p>	<p>The monitored oxygen level at a supplemental gas extraction point exceeded 5% and could not be corrected within 15 days.</p>	<p>Visual review of data</p>	<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 compromised condition, and the radius of influence of the surrounding gas wells overlap this extraction point, an abandonment request was provided to the Department on 05/06/20. The Department approved the abandonment of LIW-02 on 05/07/20. This supplemental gas extraction point was abandoned by site personnel on 05/08/20, thus ending the deviation 46 days after the initial exceedance.</p>

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<p style="text-align: center;"><i>(Continued from Page 5)</i></p> <p><u>Part I.ZZZ.1. b.(1)</u> (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>(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

5 129 2020

Date