

ENVIRONMENTAL SAMPLING CORPORATION

Dedicated to Environmental Monitoring, Science & Technology

November 30, 2020

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

**RE: GFL Environmental Emerald Park Landfill
Air Pollution Control Operation Permit No: 268244130-P20
FID No. 268244130
Deviation of Permit Conditions: October 2020**

Dear Mr. Volpentesta:

On behalf of GFL Environmental 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. This deviation 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 414-422-9075 ext. 102 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: GFL Environmental EPL (electronic copy)
Chad Siegle: GFL Environmental EPL (electronic copy)
John Paczkowski: GFL Environmental EPL (electronic copy)
Scott Croft: GFL Environmental EPL (electronic copy)
GFL Environmental EPL - File Copy
Mark Torresani: 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)

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 GFL Environmental 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 October 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)(a)</u> (3) The permittee shall operate each interior wellhead in the gas collection system in the following manner: (a) Except as specified in (c) below, with a landfill gas temperature less than 131 °F (55 °C).</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</p> <p><i>(Continued on Page 2)</i></p>	S02, P02 Operation of EPL	<p>Vertical Gas Extraction Well:</p> <p>GE-68R Temp > 131 deg. F 10/29/20 – 11/24/20 (26 days)</p>	NA	The monitored temperature at a gas extraction well exceeded 131 deg. F and could not be corrected within 15 days.	Visual review of data	<p>Vertical gas extraction well GE-68R exceeded the operating temperature during the initial monitoring conducted after installation and start-up in October 2020. The operating temperature could not be brought into compliance (i.e. less than 131 deg. F) within 15 days, but was brought into compliance NSPS and air permit operating standards on 11/24/20, 26 days after the initial exceedance.</p> <p>Gas well GE-68R was installed in Phase 5 to replace the abandoned gas well GE-68. The wellfield exceedance was likely associated with the initial start-up of GE-68R on 10/29/20. Despite the elevated temperatures, field monitoring for carbon monoxide (CO) on 11/24/20 indicated that no CO was detected. CO levels less than 500 ppm indicate there is not a fire present.</p>

Air Operation Permit Deviation Summary Report

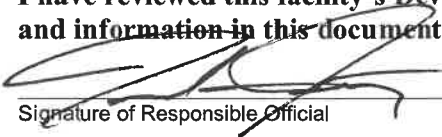
Form 4530-171 (R 9/10)

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;"><i>(Continued from Page 1)</i></p> <p>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;"><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><i>(See above)</i></p>	<p><i>(See above)</i></p>	<p><i>(See above)</i></p>	<p><i>(See above)</i></p>	<p><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

Michael Stoeckigt

Typed or Printed Name of Signatory

Region Vice President

Title

11 / 30 / 2020

Date