

# ENVIRONMENTAL SAMPLING CORPORATION

*Dedicated to Environmental Monitoring, Science & Technology*

December 31, 2020

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

**RE: Emerald Park Landfill, LLC  
Air Pollution Control Operation Permit No: 268244130-P20  
FID No. 268244130  
Deviation of Permit Conditions: November 2020**

Dear Mr. Volpentesta:

On behalf of Emerald Park Landfill, LLC (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: EPL (electronic copy)  
Chad Siegle: EPL (electronic copy)  
John Paczkowski: EPL (electronic copy)  
Scott Croft: EPL (electronic copy)  
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.).

<b>A.) Facility Information</b>	
1.) Facility Name Emerald Park Landfill, LLC	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 November 2020	

<b>B.) Deviation Summary Report</b>						
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><b><u>I.B.1.b.(1)(a),(b)</u></b>            (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><b><u>I.B.1.b.(2)(a),(b)</u></b>            (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	11/02/20 11:57 – 11/02/20 13:02 (1.08 hr.)  11/10/20 17:47 – 11/11/20 06:57 (13.16 hr.)	NA	There were two instances 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 on 11/02/20 due to a manual program adjustment to update the datalogger timestamp. The gas extraction system was operating during this period of missed data records. The datalogger resumed normal operation following the manual adjustment.  There was an extended period of missed open flare data records on 11/10/20-11/11/20 due to power outage. The datalogger operated on battery back-up power for a period of time following the power outage until the auxiliary power supply was exhausted. The gas extraction system was also affected by the power outage and was not operating during this period of missed data records.  <i>(Continued on Page 2)</i>

# 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;"><b><u>Part I.ZZZ.1.b.(1)</u></b></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>(Continued from Page 1)</i></p> <p>The computer datalogger was restarted after power was restored and resumed normal operation. The gas extraction system was restarted and 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 style="text-align: center;"><b><u>I.A.1.b.(27)(c)</u></b></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;"><b><u>I.A.1.b.(28)(a),(b)(i)</u></b></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 <math>\pm 1\%</math> of the temperature being measured, expressed in degrees Celsius, or <math>\pm 0.5</math> 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;"><b><u>I.A.1.c.(5)(a)</u></b></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><b>Missed data:</b></p> <p>11/02/20 11:57 – 11/02/20 13:02 (1.08 hr.)</p> <p>11/10/20 17:47 – 11/11/20 06:57 (13.16 hr.)</p> <p><b>Erroneous data:</b></p> <p>11/10/20 16:43 – 11/10/20 17:52 (1.16 hr.)</p>	<p>NA</p>	<p>There were two instances in which the datalogger did not record flare temperature or flow to the enclosed flare and one instance in which erroneous enclosed flare temperatures were recorded for periods 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 on 11/02/20 due to a manual program adjustment to update the datalogger timestamp. The gas extraction system was operating during this period of missed data records. The datalogger resumed normal operation following the manual adjustment.</p> <p>There was an extended period of missed enclosed flare data records on 11/10/20-11/11/20 due to power outage that shutdown the gas extraction system. The datalogger operated on battery back-up power for a period of time following the power outage until the auxiliary power supply was exhausted. While the datalogger was operating on battery back-up power, the enclosed flare temperature readings locked-up and erroneous temperature data was recorded (i.e. (A) 714 deg. F, (B) 709 deg. F, (C) 554 deg. F), and (D) 470 deg. F) for the enclosed flare.</p> <p>The computer datalogger was restarted after power was restored and resumed normal operation. The gas extraction system was restarted and resumed normal operation. No additional action was required.</p>

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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 3)</i></p> <p><b><u>Part I.ZZZ.1.b.(1)</u></b>                      (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 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

Michael Stoeckigt  
\_\_\_\_\_  
Typed or Printed Name of Signatory

Region Vice President  
\_\_\_\_\_  
Title

12 / 31 / 2020  
\_\_\_\_\_  
Date