

# ENVIRONMENTAL SAMPLING CORPORATION

*Dedicated to Environmental Monitoring, Science & Technology*

September 28, 2021

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

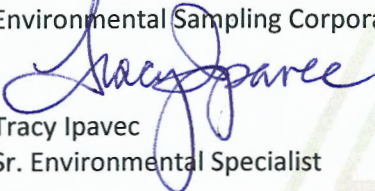
**RE: Emerald Park Landfill**  
**Air Pollution Control Operation Permit No: 268244130-P30**  
**FID No. 268244130**  
**Deviation of Permit Conditions: August 2021**

Dear Mr. Volpentesta:

On behalf of 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. Deviations 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  
Nick Dykstra: 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	2.) FID 268244130
3.) Permit Number Operation Permit: 268244130-P30	4.) Permit Issue Date March 23, 2021
5.) Reporting Period Covered by this Deviation Report August 2021	

<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>Permit No. 268244130-P30</b></p> <p><b><u>Part I.A.1.a.</u></b>            (60.756) Monitoring of operations:            (c) Each owner or operator seeking to comply with 40 CFR s. 60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:            (1) 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><u>Part I.A.1.a.</u></b>            (60.758) Recordkeeping requirements:            (c) The owner or operator shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in 40 CFR s. 60.756 as well as up-to-date, readily accessible records for periods</p> <p><i>(Continued on Page 2)</i></p>	S01, C01 OPEN FLARE	08/21/21 11:06 – 08/21/21 11:16 (0.17 hr.)	NA	There was one instance in which erroneous flare temperature was recorded for the open flare.	Visual review of data	There was one brief period of erroneous open flare temperature data records (i.e. 2,462 deg. F) on 08/21/21 due to a thermocouple or datalogger malfunction. The malfunction was an isolated incident; there were no other periods of erroneous open flare temperature records during the reporting period. No action was required.

# Air Operation Permit Deviation Summary Report

Form 4530-171 (R 9/10)

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<p><i>(Continued from Page 4)</i></p> <p>of operation during which the parameter boundaries established during the most recent performance test are exceeded.</p> <p>(4) Each owner or operator seeking to comply with 40 CFR Part 60, Subpart WWW, by use of an open flare shall keep up-to-date, readily accessible continuous records of the flame or flare pilot flame monitoring specified under 40 CFR s. 60.756(c), and up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.</p>	<p>S01, C01 OPEN FLARE</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>

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<p><b>Permit No. 268244130-P30</b></p> <p style="text-align: center;"><b><u>Part I.A.1.a.</u></b></p> <p>(60.756) Monitoring of operations:                      (c) Each owner or operator seeking to comply with 40 CFR s. 60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:                      (1) 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.                      (2) A device that records flow to or bypass of the flare. The owner or operator shall either:                      (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; or</p> <p style="text-align: center;"><b><u>Part I.A.1.a.</u></b></p> <p>(60.758) Recordkeeping requirements:                      (c) The owner or operator shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in 40 CFR s. 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.                      (2) The owner or operator shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under 40 CFR s. 60.756.</p> <p style="text-align: center;"><i>(Continued on Page 6)</i></p>	<p>S01, C01 OPEN FLARE</p>	<p>08/20/21 12:48 – 08/20/21 12:56 (0.12 hr.)</p> <p>08/23/21 07:51 – 08/23/21 07:59 (0.14 hr.)</p> <p>08/30/21 12:20 – 08/30/21 12:30 (0.16 hr.)</p>	<p>NA</p>	<p>There were three periods of missed temperature and flow data records for the open flare</p>	<p>Visual review of data</p>	<p>There were three periods of missed open flare temperature and flow data records due to a computer restarts to reset the programs. The datalogger resumed normal operation following the restarts. No additional action was required.</p>

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<p style="text-align: center;"><i>(Continued from Page 5)</i></p> <p>(4)Each owner or operator seeking to comply with 40 CFR Part 60, Subpart WWW, by use of an open flare shall keep up-to-date, readily accessible continuous records of the flame or flare pilot flame monitoring specified under 40 CFR s. 60.756(c), and up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.</p>	S01, C01 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><b>Permit No. 268244130-P30</b></p> <p style="text-align: center;"><b><u>Part I.A.1.a.</u></b></p> <p>(60.756) Monitoring of operations:                      (b) Each owner or operator seeking to comply with 40 CFR s. 60.752(b)(2)(iii) using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment:                      (1) A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ±1 percent of the temperature being measured expressed in degrees Celsius or ±0.5 degrees Celsius, whichever is greater.                      (2) A device that records flow to or bypass of the control device. The owner or operator shall either:</p> <p style="text-align: center;"><i>(Continued on Page 7)</i></p>	S05, C05 ENCLOSED FLARE	08/20/21 12:48 – 08/20/21 12:56 (0.12 hr.)  08/23/21 07:51 – 08/23/21 07:59 (0.14 hr.)  08/30/21 12:20 – 08/30/21 12:30 (0.16 hr.)	NA	There were three periods of missed temperature and flow data records for the enclosed flare	Visual review of data	There were three periods of missed enclosed flare temperature and flow data records due to a computer restarts to reset the programs. The datalogger resumed normal operation following the restarts. No additional action was required.

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<p style="text-align: center;"><i>(Continued from Page 6)</i></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; or</p> <p style="text-align: center;"><b><u>Part I.A.1.a.</u></b></p> <p>(60.758) Recordkeeping requirements:                      (c) The owner or operator shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in 40 CFR s. 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.                      (2) The owner or operator shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under 40 CFR s. 60.756.</p>	<p>S05, C05 ENCLOSED FLARE</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

Regional Vice President

Title

9 / 27 / 21

Date