



DEPARTMENT OF ENVIRONMENTAL PROTECTION

Isiah Leggett  
County Executive

Robert Hoyt  
Director

May 10, 2012

Martha Hynson, Chief  
Landfill Operations Division  
Solid Waste Program  
Maryland Department of the Environment  
1800 Washington Blvd., Suite 605  
Baltimore, MD 21230-1719

Re: Gude Landfill – Assessment of Corrective Measures Work Plan

Dear Ms. Hynson:

This letter is in response to your letter to the Montgomery County Department of Environmental Protection (DEP) dated March 13, 2012 (received March 16, 2012) that approved the Nature and Extent Study (NES) Amendment No. 1 Report for the Gude Landfill. Your letter also required that DEP provide an Assessment of Corrective Measures (ACM) Work Plan within sixty (60) days of receipt, including a schedule for submission of the final ACM Report. We are providing the requested information herein relative to the Gude Landfill, which is located at 600 E. Gude Drive in Rockville, Maryland.

Provided below is our ACM Work Plan, which is divided into several subheadings: Project Sequence and Schedule, Technical Support, Project Funding, and Coordination with the Maryland Department of the Environment (MDE), Community and Other Jurisdictional and Public Agencies.

**Project Sequence and Schedule**

The principal phases of the Gude Landfill ACM Work Plan are outlined below, including a preliminary schedule for implementation and completion:

**Division of Solid Waste Services**

16101 Frederick Road • Derwood, Maryland 20855 • 240-777-6560 • 301-840-2385 FAX  
[www.montgomerycountymd.gov/solidwaste](http://www.montgomerycountymd.gov/solidwaste) • Located at the intersection of Route 355 and Shady Grove Road

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**Gude Landfill – Assessment of Corrective Measures  
Preliminary Project Sequence and Schedule**

Work Plan Item	Schedule	Duration
1. Develop a Scope of Work and execute a Contractor Task Order for the preparation of the Assessment of Corrective Measures (ACM) research, field work, analyses and the associated final Report for the Gude Landfill.	Jun. 2012 – Aug. 2012	3 months
2. Review of case study literature and research to identify potentially effective (i.e. preliminary) corrective measure alternatives to mitigate: low-level groundwater contamination above Maximum Contaminant Levels (MCL); landfill gas (i.e. methane) exceedences above the Lower Explosive Limit (LEL); and potential non-stormwater discharges (i.e. leachate seeps) at and in vicinity of the Landfill. Potential corrective measure alternatives that may be considered individually or in combination include: Waste Excavation (Selective and Extensive); Phytoremediation; Monitored Natural Attenuation; Landfill Cover System Improvements and Partial or Full Capping; Bioremediation; and In-Situ Permeable Barriers.	Sep. 2012 – Nov. 2012	3 months
3. Perform site specific and detailed analyses of the four (4) most feasible and effective corrective measure alternatives that exhibit the greatest potential for positive remedial impacts at the Gude Landfill. The analyses will evaluate: compliance with remediation objectives; short-term and long-term effectiveness toward quantifiable results; implementability; protection of human health and the environment; source treatment and reduction of toxicity, mobility and volume; estimated initial implementation and long-term maintenance costs; regulatory and community acceptance; and potential effects of alternatives on future land reuse.	Dec. 2012 – Feb. 2013	3 months
4. Complete an ACM Report which includes a discussion of the technical options reviewed and the basis for a final recommendation.	Mar. 2013 – May 2013	3 months
5. Submit Draft Final ACM Report with recommendation to MDE.	June 1, 2013	---
6. MDE Review Period and Response to Comments. County and Other Stakeholder Review and Response to Comments.	To Be Determined	---
7. Submit Final ACM Report and obtain MDE Approval.	To Be Determined	---
8. Public Meeting following MDE Approval of ACM.	To Be Determined	---

Note 1: Schedule may be affected by procurement and budget approval processes, public coordination efforts, and other unforeseen public obligations. Actual durations may be shorter or longer depending on such factors

Note 2: It is anticipated that document review and comment time from other County agencies, Community representatives, and other applicable Jurisdictional and Public Agencies will occur under Item 6 of the Schedule. As stated, the timeline for review and comment on the Draft Final ACM Report from these stakeholders as well as MDE is “to be determined” and is not incorporated into the schedule for submission of the Draft Final ACM Report to MDE.

### Technical Support

DEP has previously and will continue to use the existing Intergovernmental Agreement (IGA) with the Northeast Maryland Waste Disposal Authority (Authority) to provide “technical, engineering, operations, procurement and marketing assistance to the County with respect to the County’s Solid Waste Management System and in furtherance of the County’s solid waste activities.” The Authority has several pre-qualified firms under contract with expertise in hydrogeology, surveying, landfill design, permitting, construction, closure and remediation. DEP and the Authority are in the process of securing a specific proposal and cost from EA Engineering, Science, and Technology (EA Engineering) to take the principal role in the preparation of the ACM and associated Report. EA has previously provided technical support to the Authority and County for the Waste Delineation Study, NES and NES Amendment No.1 Reports and the Remediation Feasibility Memorandum.

DEP also has SCS Engineers under contract for landfill gas monitoring and collection system maintenance services, including operation and maintenance of the existing enclosed Flare Station and 0.8 MW Landfill Gas-to-Energy Facility at Gude Landfill.

### Project Funding

With respect to financial commitments, DEP has approximately \$300,000 remaining of the initial \$1.3 million dollars of FY09 funds that were allocated to cover the costs associated with the Phase 0 (Aerial/Field Survey and Waste Delineation) and Phase 1 (NES, NES Amendment No.1, and the Remediation Feasibility Memorandum) project work. These funds will be used to fund the ACM and associated Report.

Once the most feasible and effective corrective measure alternatives are selected and associated costs are estimated, DEP will prepare a formal Capital Improvement Program (CIP) budget for submission to the County Executive and the County Council to request funds to implement the remediation approach.

### Coordination with MDE, Community and Other Jurisdictional and Public Agencies

DEP has been working closely with MDE on-site inspections, site repairs and the development and approval of formal environmental monitoring plans for landfill gas, groundwater and surface water. DEP will continue to work closely with MDE to address other site issues as they arise including agreement on the final language and commitments of the Draft-Final Consent Order, which MDE intends to issue to assure the execution of the corrective measure work resulting from the ACM and associated Report at the Gude Landfill.

DEP will continue to perform best management practices for post-closure care at the Gude Landfill during the remediation project for: stormwater management, landfill gas management, erosion and sedimentation control, leachate seep correction, and good house-keeping.

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DEP continues to maintain regular communications with the adjacent residential community including the Gude Landfill Concerned Citizens (GLCC) group. In addition, the County continues to maintain a Remediation Webpage to share technical information with the community and is incorporating funds for public presentations and meetings in upcoming contract work of the ACM and associated Report. DEP will also continue to keep the Maryland-National Capital Park and Planning Commission (M-NCPPC) informed of the progress of the ACM as the Exchange of Land due to waste encroachment is nearing completion.

The final recommendations for corrective measure implementation will be incorporated into the County and M-NCPPC Mandatory Referral processes, including the consideration of potential future land uses and reuses of the Landfill site that are consistent with the remediation objectives and plans. The County Executive and County Council will also play an integral role in the review and selection of potential future land uses and reuses for the Landfill site and in seeking public input through public hearings on the CIP project(s) and other forums.

Please contact me at 240-777-6569, or at [peter.karasik@montgomerycountymd.gov](mailto:peter.karasik@montgomerycountymd.gov) if you have questions or comments concerning this Work Plan.

Sincerely,



Peter R. Karasik, P.E.  
Section Chief, DEP/DSWS Central Operations

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Enclosures

cc: Karen Kumm Morris, Maryland-National Capital Park and Planning Commission  
Keith Ligon, Gude Landfill Concerned Citizens  
Robert Hoyt, Director, Department of Environmental Protection  
Daniel Locke, Chief, DEP/DSWS  
David Lake, Special Assistant/Office of the Director, DEP  
Stephen Lezinski, Engineer III, DEP/DSWS