



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Robert M. Summers, Ph.D.  
Deputy Secretary

May 27, 2009

CERTIFIED MAIL

Return Receipt Requested

Mr. Peter R. Karasik  
Department of Environmental Protection  
16101 Frederick Road  
Derwood MD 20855

Dear Mr. Karasik:

This is in reference to the Gude Landfill - Remediation Approach Project Sequence and Schedule dated April 2009 for the Gude Sanitary Landfill, which was received by the Maryland Department of the Environment (the "Department") on April 29, 2009. The Department has reviewed and hereby approves the project sequence and schedule.

Per the submittal, the Department approves the scope of work for the survey and limit of waste delineation and the scope of work for the nature and extent study. Enclosed please find a letter from the Gude Landfill Concerned Citizens with comments on the County's proposed work plan and remediation approach. The Department is forwarding this letter to you to insure that community concerns are addressed as appropriate. Please provide a copy of the 50% status report for the nature and extent study when available for Departmental review.

The Department appreciates your cooperation in this important matter. If there are any questions regarding this matter, please contact Mr. Andrew Grenzer, Project Manager, at (410) 537-3318.

Sincerely,

Martha Hynson, Chief  
Landfill Operations Division

MH:ATG:sm

Enclosure

cc: Mr. Stephen Lezinski  
Mr. Horacio Tablada  
Mr. Brian Coblenz

RECEIVED  
DEP - SOLID WASTE

MAY 28 2009

# Gude Landfill Concerned Citizens

15461 Indianola Drive  
Derwood, MD 20855

May 19, 2009

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

Dear Ms. Hynson:

On April 29th the Montgomery County Department of Environmental Protection (DEP) submitted its proposed statement of work for the Nature and Extent Study and proposed Remediation Approach timeline for the Gude Landfill. By copy of that letter, the Gude Landfill Concerned Citizens (GLCC) was invited to comment on the plans and approach. The GLCC offers these comments and recommendations:

## **Task 2 – Field Survey**

We recommend deleting the task (4th bullet) to mark the potential outline of the yard trim processing area. This has absolutely nothing to do with the approach to remediation and appears to be another attempt to avoid MDE direction to not proceed with any aspect of the Yard Trim Project until it has been completely presented to and approved by MDE.

Our community has voiced a clear and resounding objection to any relocation of the commercial wood processing activities to the Gude Landfill site. This Yard Trim site will receive thousands of 18 wheeler trucks and host multiple operations of wood processing equipment such as loaders and tub grinders. The expected wood waste storm water runoff will degrade an already compromised Rock Creek stream. In addition the added weight and vibration of the operating equipment will adversely impact the fragile hydrologic system under the landfill and result in increased contaminate migration.

## **SOW – Nature and Extent Study**

In section C, we recommend that the evaluation include the public marshland 200 yards west-north-west of the Gude Landfill. While not on the landfill border, this area is downhill and collects a lot of landfill storm water runoff. There are also a number of springs in and around the marsh where the first aquifer surfaces.

In section P, we recommend that the exposure evaluation include the potential break through of the contaminated plume into Rock Creek and the inclusion of the human pathway vector on the entire Rock Creek watershed and the subsequent downstream impacts to the downstream freshwater water intakes. This evaluation should also include the potential impact to the Chesapeake Bay Clean Water plan.

We believe that this plan must acknowledge that there could be human exposure pathways. Not a single heavy metal will evaporate and except during the hottest months in the summer, only minimal VOC's will evaporate, but not before affecting water quality and increasing the bioaccumulation of contaminants. Despite the testimony of a Montgomery County official, the GLCC does not believe that dilution is the solution to the Gude Landfill contamination.

#### **Post Closure Maintenance Activities**

We are concerned about Leachate Seep #1 and the DEP statement that there is no evidence of leachate migrating beyond the landfill property. A slope failure or seepage due to the fact that the cap has eroded is a condition that needs to be repaired. Seeping within limits or seeping only on landfill property is not an acceptable environmental solution. To ensure the safety of our neighborhood, we recommend that DEP conduct a single full spectrum water sampling of all seeps/springs within 500 yards of the landfill bounds. Additionally, we recommend an analysis of the landfill contaminate impact, both present and potential, on the Total Maximum Daily Load (TMDL) for the Rock Creek stream segment.

#### **Summary**

We appreciate all the efforts that have gone into the preparation of this Remediation Approach, particularly the specific tasks to reach out to the community with public meetings and an information sharing website. The GLCC and our entire community are committed to working with DEP and MDE to ensure a safe and hazard free neighborhood environment.

Sincerely,  
Keith Ligon,  
GLCC Chairman

cc:

Horatio Tablada, Director Waste Management Administration, MDE  
Karen Kumm Morris, MNPPC  
Robert Hoyt, Director DEP  
Peter Karasik, Section Chief, DEP/DSWS  
Daniel Locke, Chief, DEP/DSWS  
David Lake, Special Assistant/Office of the Director, DEP  
Stephen Lezinski, Engineer III, DEP/DSWS