

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Isiah Leggett County Executive

April 23, 2013

Robert Hoyt Director

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, Revised Schedule

Dear Ms. Hynson:

Per our telephone discussion on April 18, 2013, DEP has prepared a revised project sequence and schedule under Attachment 1 for submission of the Assessment of Corrective Measures (ACM) report to the Maryland Department of the Environment (MDE). The purpose of this revision is to allow adequate time for County agencies and other stakeholders to review and comment on the draft ACM report and for DEP to address such comments prior to submission to MDE. We request that the submission date for the ACM report be revised from the previously agreed upon delivery date of June 1, 2013 (noted in your letter dated June 18, 2012 approving the ACM Preliminary Project Sequence and Schedule) to <u>August 1, 2013</u>.

We will include this change when we revise and update the schedule required under the Consent Order. Please contact me at 240-777-6569, or at peter.karasik@montgomerycountymd.gov if you have questions or comments concerning this request.

Sincerely,

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

Peter R. Karweik

PRK:stl/gudelf_acm_extension(4-18-13).doc 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, Senior Engineer, DEP/DSWS

Division of Solid Waste Services

Attachment 1 Gude Landfill – Assessment of Corrective Measures Revised Project Sequence and Schedule

Work Plan Item	Schedule	Duration
(revisions presented in bold/italics) 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. Prepare a Draft ACM Report which includes a discussion of the available technologies and technical options for remediation and the basis for a final recommendation.	Mar. 2013 – April 2013	2 months
5. County Agency and other stakeholder draft ACM review and response to comments.	May 2013 – Jul. 2013	3 months
6. Submit ACM Report with recommendation to MDE.	August 1, 2013	
7. MDE Review Period and Response to Comments.	To Be Determined	
8. Submit Final ACM Report and obtain MDE Approval.	To Be Determined	
9. 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 the ACM report review and comment period from County agencies and other stakeholders (community representatives and other applicable jurisdictional and public agencies) will occur under Item 5 above.

Note 3: The timeline for review and comment on the ACM Report from MDE is "to be determined" and is not incorporated into the schedule for submission of the ACM Report to MDE.