Gude Landfill

Landfill Gas Monitoring Report

Third Quarter 2015 (July 2015 – September 2015)

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For the:

Gude Landfill

Presented To:

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1. BACKGROUND

The Montgomery County Department of Environmental Protection, Division of Solid Waste Services (DEP/DSWS) prepared and obtained Maryland Department of the Environment (MDE) approval for a Landfill Gas Monitoring Plan (LFGMP) for the closed Gude Landfill on April 22, 2009. The LFGMP presents information and procedures necessary to implement a landfill gas (LFG) monitoring program for the Gude Landfill. The Gude Landfill is owned and maintained by DEP/DSWS. The Gude Landfill is located at 600 E. Gude Drive, Rockville, Maryland in Montgomery County.

The LFGMP requires quarterly LFG monitoring of the monitoring wells located along the Gude Landfill property boundary and within on-site structures. In addition, DEP conducts weekly LFG monitoring of the wells located along the property boundary. The LFG monitoring is performed to assess the potential for subsurface migration of LFG, specifically, for the presence of methane gas beyond the landfill property.

The regulatory standard concerning the collection and monitoring of explosive gases (i.e. methane) at solid waste landfills in Maryland is established in the Code of Maryland Regulations (COMAR) Title 26, Subtitle 4, Chapter 7, Part 03B(9) – COMAR 26.04.07.03B(9) – "A facility may not be designed or operated in such a manner that the concentration of explosive gases generated by the facility exceeds 25 percent of the lower explosive limits for the gases in facility structures, excluding gas control or recovery system components, and the lower explosive limit for the gases at the property boundary." According to this standard, methane concentrations resulting from the presence of LFG in on-site structures at Gude Landfill cannot exceed 25 percent of the lower explosive limit (LEL) (1.25 percent by volume), and methane concentrations cannot exceed 100 percent of the LEL (5.00 percent by volume) at the Gude Landfill property boundary.

2. SUBSURFACE METHANE MONITORING

The Gude Landfill currently has seventeen (17) permanent LFG compliance monitoring wells that are located along the southern and northwest property boundary. Ten (10) of the seventeen (17) permanent LFG monitoring wells were installed in June 2010. The LFG monitoring wells consist of multi-depth probes at differing depths: shallow (s) at 10-15 feet; intermediate (i) at 23-28 feet; and deep (d) at 33-38 feet that are spaced at intervals of approximately 300 feet. Several of the wells are single-depth probes due to shallow groundwater conditions. The monitoring wells provide a media through which LFG can be measured from various depths from the adjacent fill area. The monitoring wells are numbered W-01 through W-11 on the northwest slope and W-25 through W-30 on the south slope. All monitoring locations can be found on the attached **Figure 1**. The proposed monitoring well located between W-10 and W-11 could not be installed due to competent rock and construction and demolition material encountered in the subsurface.

On September 17, 2015 CB&I performed the Third Quarter 2015 (July – September 2015) monitoring event for the LFG monitoring wells along the Gude Landfill property boundary. CB&I utilized a Landtec GEM 5000 Infrared Gas Analyzer (GEM) to monitor for

the following parameters within the LFG monitoring wells: methane, carbon dioxide, oxygen, balance gas (assumed to be nitrogen) and relative pressure (static pressure). The procedure for the monitoring is as follows. A quick connect fitting is attached to both ends of the inlet tubing, which is attached to the GEM and into the corresponding fitting on each LFG monitoring well. The GEM pump is then turned on, which creates a vacuum on the LFG monitoring well and sampling (i.e. monitoring) is initiated. Continuous monitoring is performed on the LFG until all readings stabilize, for a period of not less than one minute, after which the reading is saved. Table 1 below (and **Appendix A**), summarizes the monitoring data for the LFG monitoring wells.

One methane exceedances were found in the LFG monitoring wells during this quarterly monitoring event.

TABLE 1
SUMMARY OF QUARTERLY SUBSURFACE METHANE MONITORING
(September 17, 2015)

Monitoring Well Name	CH ₄ %vol	CO ₂ %vol	O ₂ %vol	Balance (%vol)	Relative Pressure (in. H ₂ O)
MW30	0.0	16.5	8.2	75.3	-0.03
MW01	0.0	16.4	5.8	77.8	0
MW29	0.0	0.1	21	78.9	0.02
MW28	8.4	6.5	1.6	83.5	0.01
MW27	0.0	0.1	21.1	78.8	0.01
MW26S	52.6	34.6	0.7	12.1	0
MW25D	0.0	0.7	21.1	78.2	0.01
MW25S	0.0	5.6	17.2	77.2	0
MW02	0.0	7.7	16.8	75.5	0.02
MW10D	0.0	1.5	19.6	78.9	0.02
MW10S	0.0	6.1	15.4	78.5	-0.01
MW10I	0.0	6.6	14.1	79.3	0
MW11	0.0	0.1	21.2	78.7	0
MW3D	0.0	0.2	21.4	78.4	0
MW3S	0.0	1.1	20.7	78.2	0.03
MW3I	0.0	0.9	19.9	79.2	0.01
MW4D	0.0	0.2	21.3	78.5	0.06
MW4S	0.0	2.5	17.8	79.7	0.04
MW4I	0.0	3.1	14.9	82	-13.7
MW5D	0.0	0.1	20.9	79	-1.89
MW5S	0.0	1.7	19.1	79.2	0.04
MW5I	0.0	0.1	21	78.9	-0.03

MW6D	0.0	0.1	20.9	79	-0.02
MW6S	0.0	0.5	20.3	79.2	0
MW6I	0.0	0	20.8	79.2	0.01
MW7S	0.0	3.1	18.2	78.7	0.01
MW7I	0.0	0.1	20.9	79	-0.01
MW8D	0.0	0.2	20.8	79	-0.02
MW8S	0.0	6.9	16.2	76.9	0.02
MW8I	0.0	4.5	16.4	79.1	0.03
MW9D	0.0	0.1	21	78.9	0.03
MW9S	0.0	1	20.2	78.8	0.03
MW9I	0.0	1.2	19.7	79.1	0.03

Note 1. % vol. = Percent by Volume

Note 2. in. H₂O. = Inches of Water

3. EXPLOSIVE GAS MONITORING WITHIN ON-SITE STRUCTURES

At the Gude Landfill, six (6) structures are monitored for the presence of explosive gas as part of the quarterly LFG monitoring: Men's Shelter and Redevelopment Expansion; LFG Flare Station Shed; and Landfill Gas-to-Energy Facility Storage Container, Switchgear Enclosure, and the Former Power Plant Building.

On September 17, 2015 CB&I performed the Third Quarter 2015 monitoring event. Using the GEM 5000 and a Combustible Gas Monitor with sample pump, CB&I conducted methane monitoring inside the on-site structures located at the Oaks Landfill. The GEM 5000 measures methane (% vol.), carbon dioxide (% vol.), oxygen (% vol.), and gas balance (% vol.). The Combustible Gas Monitor measures CH4 (ppm) and O2 (% volume). CB&I Staff walked through the interiors of the structures and monitored the perimeter wall interface, floor to wall interface in hallways and rooms, floor penetrations, and other likely potential gas pathways as well as the exterior perimeter of the structures.

No combustible gas (e.g. methane) was detected in any of the six (6) buildings at the Gude Landfill during the quarterly monitoring event.

3. WEEKLY SUBSURFACE METHANE MONITORING AT PROPERTY BOUNDARY

Monitoring Results

In addition to the CB&I quarterly LFG monitoring, DEP performs weekly monitoring of the LFG monitoring wells that are located along the Gude Landfill property boundary. In accordance with the LFGMP and supplemental correspondence with MDE, LFG (i.e. methane) exceedances that were measured as part of the DEP weekly monitoring are presented in this quarterly report. Documentation and explanation of the measured methane gas exceedances (of previous quarterly monitoring events) and corresponding response actions to mitigate the exceedance are also provided herein.

During the Third Quarter 2015, measured concentrations of methane in W26S intermittently exceeded existing MDE regulatory requirements. It is likely that the measured methane exceedances were due to a combination of factors: water logged conditions in the subsurface, and changing subsurface conditions due to waste mass decomposition, waste in close proximity to the property line, and some intermittent system downtime.

As a result of the methane exceedances, CB&I performed well field adjustments to improve vacuum and conducted follow-up gas monitoring. All monitoring wells, are currently in compliance and all, except W26S (intermittent exceedances), remained fully in compliance during the entire Third Quarter of 2015.

Appendix B presents a summary of the methane exceedances that were recorded by DEP during the Third Quarter of 2015.

a. METHANE MITGATION PLAN

As a result of methane exceedances, a methane mitigation plan was implemented in the First Quarter 2010. The plan includes multiple steps to take to remediate gas being detected in the monitoring network. In some instances where wellfield adjustments were insufficient to control elevated methane concentrations, the County has elected to expand the collection system to control migration. In January of 2014, four additional LFG extraction wells were installed in the vicinity of W-26S and W-28S in response to elevated methane detected in that area. In May of 2014, two LFG extraction wells were installed to control methane migration in the area of probes W-05 and W-06 after wellfield adjustments did not decrease the methane concentrations below 5 percent by volume.

During the third quarter of 2015 frequent gas detections have reoccurred at probe W-26S and W-28S. As an initial response to these detections several adjustments have been made to the collection system to try to exert more vacuum on the adjacent LFG extraction wells. The vacuum was increased at the blower/flare station and the wellfield was adjusted in the vicinity of the probes to increase the gas collection from this area of the landfill. Adjacent wells were also checked for high water levels, but high water levels were not detected in any wells. The methane mitigation activities

performed during this quarter were successful in decreasing the methane concentrations in these probes to below 5 percent by volume before the first quarter 2015 monitoring event.

The County and CB&I will continue to implement portions of the methane mitigation plan as necessary to keep the site in compliance with subsurface methane requirements. The County is currently investigating expansion of the LFG collection system to allow for improved gas collection in the area of W-26S and W-28S.



Figures

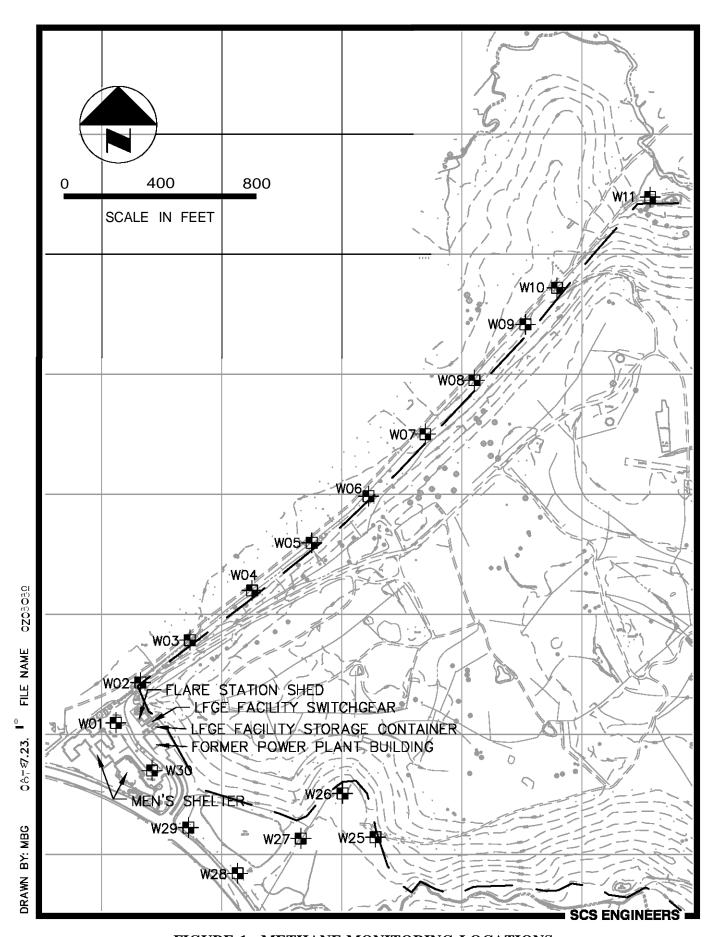


FIGURE 1 - METHANE MONITORING LOCATIONS



Fourth Quarter 2015

Appendix A

Field Data

Table 2- Gude Landfill- 2015 3rd Quarter Monitoring Probe Results

Name		Jac Lanaini 2	CH4	CO2	02	Balance	Relative	
MW01 8:44 AM 0.0 16.4 5.8 77.8 0 MW29 8:50 AM 0.0 0.1 21 78.9 0.02 MW28 8:53 AM 8.4 6.5 1.6 83.5 0.01 Increased CH4 MW27 8:55 AM 0.0 0.1 21.1 78.8 0.01 MW26S 9:01 AM 52.6 34.6 0.7 12.1 0 Increased CH4 MW25D 9:08 AM 0.0 0.7 21.1 78.2 0.01 MW25S 9:09 AM 0.0 5.6 17.2 77.2 0 MW02 9:25 AM 0.0 7.7 16.8 75.5 0.02 MW10D 9:33 AM 0.0 1.5 19.6 78.9 0.02 MW11 9:38 AM 0.0 6.1 15.4 78.5 -0.01 MW3D 9:47 AM 0.0 0.1 21.2 78.7 0 MW3S 9:48 AM 0.0	Name	Date/Time	(% by	(% by	(% by	(% by	Pressure	COMMENTS
MW29 8:50 AM 0.0 0.1 21 78.9 0.02 MW28 8:53 AM 8.4 6.5 1.6 83.5 0.01 Increased CH4 MW27 8:55 AM 0.0 0.1 21.1 78.8 0.01 MW26S 9:01 AM 52.6 34.6 0.7 12.1 0 Increased CH4 MW25D 9:08 AM 0.0 0.7 21.1 78.2 0.01 MW25S 9:09 AM 0.0 0.5 6 17.2 77.2 0 MW25S 9:09 AM 0.0 5.6 17.2 77.2 0 MW02D 9:25 AM 0.0 7.7 16.8 75.5 0.02 MW10S 9:33 AM 0.0 6.1 15.4 78.5 -0.01 MW11 9:35 AM 0.0 6.6 14.1 79.3 0 MW3D 9:47 AM 0.0 0.2 21.4 78.4 0 MW3I 9:49 AM	MW30	8:37 AM	0.0	16.5	8.2	75.3	-0.03	
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MW4D 9:53 AM 0.0 0.2 21.3 78.5 0.06 MW4S 9:53 AM 0.0 2.5 17.8 79.7 0.04 MW4I 9:55 AM 0.0 3.1 14.9 82 -13.7 MW5D 10:11 AM 0.0 0.1 20.9 79 -1.89 MW5S 10:12 AM 0.0 1.7 19.1 79.2 0.04 MW5I 10:13 AM 0.0 0.1 21 78.9 -0.03 MW6D 10:17 AM 0.0 0.1 20.9 79 -0.02 MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8I 10:33 AM 0.0 4.5 16.4	MW3S	9:48 AM	0.0	1.1	20.7	78.2	0.03	
MW4S 9:53 AM 0.0 2.5 17.8 79.7 0.04 MW4I 9:55 AM 0.0 3.1 14.9 82 -13.7 MW5D 10:11 AM 0.0 0.1 20.9 79 -1.89 MW5S 10:12 AM 0.0 1.7 19.1 79.2 0.04 MW5I 10:13 AM 0.0 0.1 21 78.9 -0.03 MW6D 10:17 AM 0.0 0.1 20.9 79 -0.02 MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7I 10:26 AM 0.0 3.1 18.2 78.7 0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:36 AM 0.0 0.1 21	MW3I	9:49 AM	0.0	0.9	19.9	79.2	0.01	
MW4I 9:55 AM 0.0 3.1 14.9 82 -13.7 MW5D 10:11 AM 0.0 0.1 20.9 79 -1.89 MW5S 10:12 AM 0.0 1.7 19.1 79.2 0.04 MW5I 10:13 AM 0.0 0.1 21 78.9 -0.03 MW6D 10:17 AM 0.0 0.1 20.9 79 -0.02 MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.02 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21	MW4D	9:53 AM	0.0	0.2	21.3	78.5	0.06	
MW5D 10:11 AM 0.0 0.1 20.9 79 -1.89 MW5S 10:12 AM 0.0 1.7 19.1 79.2 0.04 MW5I 10:13 AM 0.0 0.1 21 78.9 -0.03 MW6D 10:17 AM 0.0 0.1 20.9 79 -0.02 MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:36 AM 0.0 0.1 21 78.9 0.03 MW9D 10:36 AM 0.0 1 20.2	MW4S	9:53 AM	0.0	2.5	17.8	79.7	0.04	
MW5S 10:12 AM 0.0 1.7 19.1 79.2 0.04 MW5I 10:13 AM 0.0 0.1 21 78.9 -0.03 MW6D 10:17 AM 0.0 0.1 20.9 79 -0.02 MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW4I	9:55 AM	0.0	3.1	14.9	82	-13.7	
MW5I 10:13 AM 0.0 0.1 21 78.9 -0.03 MW6D 10:17 AM 0.0 0.1 20.9 79 -0.02 MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW5D	10:11 AM	0.0	0.1	20.9	79	-1.89	
MW6D 10:17 AM 0.0 0.1 20.9 79 -0.02 MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW5S	10:12 AM	0.0	1.7	19.1	79.2	0.04	
MW6S 10:19 AM 0.0 0.5 20.3 79.2 0 MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW5I	10:13 AM	0.0	0.1	21	78.9	-0.03	
MW6I 10:20 AM 0.0 0 20.8 79.2 0.01 MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW6D	10:17 AM	0.0	0.1	20.9	79	-0.02	
MW7S 10:25 AM 0.0 3.1 18.2 78.7 0.01 MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW6S	10:19 AM	0.0	0.5	20.3	79.2	0	
MW7I 10:26 AM 0.0 0.1 20.9 79 -0.01 MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW6I	10:20 AM	0.0	0	20.8	79.2	0.01	
MW8D 10:30 AM 0.0 0.2 20.8 79 -0.02 MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW7S	10:25 AM	0.0	3.1	18.2	78.7	0.01	
MW8S 10:32 AM 0.0 6.9 16.2 76.9 0.02 MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW7I	10:26 AM	0.0	0.1	20.9	79	-0.01	
MW8I 10:33 AM 0.0 4.5 16.4 79.1 0.03 MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW8D	10:30 AM	0.0	0.2	20.8	79	-0.02	
MW9D 10:36 AM 0.0 0.1 21 78.9 0.03 MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW8S	10:32 AM	0.0	6.9	16.2	76.9	0.02	
MW9S 10:37 AM 0.0 1 20.2 78.8 0.03	MW8I	10:33 AM	0.0	4.5	16.4	79.1	0.03	
	MW9D	10:36 AM	0.0	0.1	21	78.9	0.03	
MW9I 10:39 AM 0.0 1.2 19.7 79.1 0.03	MW9S	10:37 AM	0.0	1	20.2	78.8	0.03	
	MW9I	10:39 AM	0.0	1.2	19.7	79.1	0.03	