

**Gude Landfill Remediation
Gude Landfill Concerned Citizens
Monthly Meeting No. 36**

Meeting Agenda

- 1. Meeting Sign-In Sheet**
 - a. Please sign-in.
- 2. GLCC/DEP Meeting Minutes (Meeting No. 35 on 3/12/15)**
 - a. DEP to request review and acceptance (see handout).
- 3. Updates on ACM Submitted to MDE on January 31, 2014**

DEP received the official letter of deficiency pertaining to the ACM Report from MDE on April 22, 2015 outlining the all the issues discussed in the GLCC meeting on March 11, 2015. The following is the DEP response to each of the comments. First MDE comment is stated followed by DEP response to comments.

The ACM must address corrective measures for metal exceeding Maximum Contaminant Levels.
The County did one round of low flow groundwater sampling in the spring of 2015 and intends to do a second round of low flow sampling in the fall of 2015. After having our consultant perform appropriate statistical analyses, we will reassess the level and extent of the metals exceedances and include recommendations for addressing these in the revised ACM report.

The ACM shall provide justification as to the 500-foot spacing between monitoring wells based on site information.

Due to extremely steep side slopes in several areas of the landfill as well as dense forested areas and streams, substantial waste excavation, grading, tree removal, and stream crossings may be necessary in order to provide drilling rig access and permanent monitoring well access roads at 300-foot intervals around some areas of the perimeter of the landfill. The County will work with its consultant to evaluate the site topography and conceptual feasibility of placing monitoring wells at closer intervals and describe the associated impacts and present the results in the revised ACM report. The evaluation will also include a recommended monitoring well configuration and a discussion of whether the recommended well locations will allow the collection of sufficiently representative groundwater samples to monitor compliance and progress towards the Remedial Action Objectives (RAOs).

The ACM shall provide specific information as to the percentage of waste in contact with groundwater

The County has some limited records which indicate that underdrains were recommended for use during operation of the Gude Landfill to lower the water table and increase capacity. In addition, to this documentation, DEP will have its consultant develop and execute a plan to perform several borings through the landfill to record the surface elevation, the depth of waste, the water table elevation and the base of the landfill. These will be used to develop one or more estimated cross sections and an estimate of the percentage of waste in contact with groundwater.

Table 6-1 in the ACM shall include key timeframes for reaching Remedial Action Objectives ("RAOs") for numerical ranks under short- and long-term effectiveness.

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The County will include these estimated time frames in the revised submittal of the ACM.

The ACM must include a viable contingency plan with a specific remedial alternative that addresses all RAOs should the preferred corrective measure fail to meet the objectives within the set timeframe.

The County will work with its consultant to provide a more detailed contingency plan to be included in the revised ACM report. A specific contingency measure for meeting groundwater RAOs will be identified. The County may recommend modifications to the contingency plan in the future based on additional information collected during implementation of the corrective measures.

The ACM shall contain a full engineering evaluation which led to the conclusions supported in Appendix A, Attachment 3 of the Nature and Extent Study Report, specifically that the cap has been engineered and maintained to support positive drainage and limit stormwater infiltration.

In conjunction with the revisions to the ACM report, the County will have its consultant prepare a drainage analysis and plan using an updated topographic map for the site. The County has already initiated this work. The analysis will include delineation of drainage areas and flow directions, estimated runoff quantities, capacities of existing stormwater drainage features and identification of areas that may need additional grading or other improvements. After the ACM report is approved, the County will develop a new stormwater management plan and include drainage around any new roads, benches and grading modifications associated with the implementation of the approved corrective measures. In the interim, DEP will continue to inspect the site for localized ponded areas and use its general maintenance contractor to re-grade or otherwise correct these areas.

The Groundwater and Surface Water Monitoring Plan for Gude Landfill must be revised so that it meets the Department approved Practical Quantitation Limits.

The County will prepare and submit a new Groundwater and Surface Water Monitoring Plan. The sampling methodology in the current Monitoring Plan will be assessed, considering the experience and results with the low flow sampling approach used in the spring of 2015 and planned for use in the fall of 2015. Other factors such as persistent turbidity that may require well re-development or possibly the installation of new replacement wells in similar locations will be reviewed. Consequently, DEP may propose well modifications and well replacements as well as potential changes in sampling equipment and methodology in the revised Monitoring Plan. The County has spoken with its contract laboratory, WSSC, and they will subcontract certain work to another laboratory capable of meeting the MDE required PQLs, already stated in the current Monitoring Plan.

should the County wish to pursue the use of MNA as part of a preferred alternative, it will need to fully evaluate trends in concentration and mass utilizing the guidelines established in the Office of Solid Waste and Emergency Response ("OSWER") Directive

MNA is currently not part of the recommended alternative in the ACM report. However, should the County desire MDE to consider MNA for a portion of the Gude Landfill property, additional evaluation will be performed in accordance with applicable OSWER requirements.

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Landfill Gas to Energy issues:

Routine field activities continued to be performed included monitoring the blower/flare station and perimeter monitoring wells for proper operation and monitoring.

Liquid levels regularly measured in the extraction wells along the perimeter of the landfill in the vicinity of monitoring probes indicated that perforations in the wells were clear.

SCS regularly performed routine blower/flare checks and pumped out the sump at the flare station. The condensate trap was pumped out, and the header lines were drained, as needed.

Beginning from July 1, 2015 the County will have a new operating contractor CB&I inc. for operating Gude and Oaks LFGE and LFG collection systems. The current operating staff is rehired by CB&I Inc. to continue to operate the facilities.

Most of the methane gas monitoring wells on the northwest boundary of the Gude Landfill adjacent to the gas line right-of-way and the Derwood Station community have been in compliance with Maryland Department of the Environment (MDE) standards for gas control (i.e., less than 5 percent methane by volume in wells at the property line). In the months April and May monitoring report indicated some occasional exceedances in some of these monitoring probes and the last two weekly reports indicate no exceedances.

Current Gude Landfill Operations

Normal maintenance activities such as lawn mowing, weed control, etc. continued at regular intervals. The noxious weeds treatment is started from to-day

During the June monthly inspections, five areas of surface water ponding and five areas of leachate seeps were observed.

Repairs on water ponding areas were finished in June 3rd week by re-grading the landfill cover. Repaired areas were seeded and mulched.

Leachate seeps repairs at five locations were also done simultaneously in June by excavating the area around the seepage and backfilling it with gravel and well- compacted soil. This diverts the flow of leachate back into the landfill to allow natural bacteria in the soil to help break down contaminants and prevent the flow of leachate on the surface.

4. Action/Follow-up Items and Next Meeting

Closed Action Items

- 34-1 EA to provide information about tracers that could be used during the future groundwater investigation.
Status: Closed. If tracers are used during the groundwater investigation, they will likely be fluorescent tracers.
- 34-2 The County will post a previously-performed LFG composition study and the County Executive's letter to GLCC on the remediation webpage.
Status: Closed. This information was posted on web site on April 11, 2014.

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- 35-1 County to review methane results and provide an update to GLCC.
Status: Report was e-mailed to GLCC members on March 16, 2015
- 35-2 County to provide air emissions report to GLCC for review.
Status: Closed. This information was posted on web site on March 18, 2015

Open action items at this time

- 34-3 GLCC will discuss potential near-term landfill use options they would like the County to consider and communicate them with the County.

Status: Open

Summarize New Action Items from Meeting

Next Meeting date:

Next GLCC Meeting: TBD