

GUDE LANDFILL REMEDIATION

GLCC/DEP MEETING NO. 35

DATE: March 12, 2015
TIME: 7:30 PM to 9:00 PM
LOCATION: Montgomery County Transfer Station

ATTENDANCE:

<u>Name</u>	<u>Organization</u>	<u>Designation</u>
Laszlo Harsanyi	Gude Landfill Concerned Citizens (GLCC)	Member
Dave Peterson	Gude Landfill Concerned Citizens (GLCC)	Member
Nick Radonic	Gude Landfill Concerned Citizens (GLCC)	Member
Julia Tillery	Gude Landfill Concerned Citizens (GLCC)	Member
George Wolohojian	Gude Landfill Concerned Citizens (GLCC)	Member
Peter Karasik	Montgomery County Dept. of Env. Protection (DEP)	Section Chief
Rao Malladi	Montgomery County Dept. of Env. Protection (DEP)	Senior Engineer
Dan Rogers	Montgomery County Dept. of Env. Protection (DEP)	Engineer I
Mark Gutberlet	EA Engineering, Science, and Technology, Inc., PBC (EA)	DEP Consultant

The Meeting Agenda is included as Attachment 1.
Contact information for attendees is included as Attachment 2.
Chronology of Closed Action and Follow-up Items is included as Attachment 3.
Other Attachments are referenced within the text.

MINUTES:

- 1) Peter Karasik of DEP introduced Dan Rogers, a new Engineer with Montgomery County. Mr. Rogers started with the County in February 2015.
- 2) Mr. Karasik requested approval of the minutes from GLCC/DEP Meeting No. 34. GLCC approved the minutes.
- 3) Rao Malladi of DEP stated that the ACM Report was submitted to Maryland Department of the Environment (MDE) on January 31, 2014. MDE provided preliminary comments to the County and requested a meeting to discuss the comments.
- 4) Mr. Malladi provided an update on the Assessment of Corrective Measures meeting with MDE.
 - a) DEP Met with MDE on March 3, 2015 (meeting agenda attached) to receive feedback and comments from MDE on ACM report submitted on January 31, 2014.
 - b) Metals Discussion
 - During the meeting, County DEP and MDE discussed the potential effects of elevated concentrations of suspended solids on metals detections in monitoring wells. DEP concluded based on MDE's advice that if the County switches from

the current three-well purge sampling method to the low-flow sampling method, more representative results can be obtained. Nick Radonic of GLCC asked about total metals versus dissolved metals and Mr. Malladi clarified that MDE uses total metals for compliance. Mr. Karasik stated that MDE is not convinced with the current data that metals can be left untreated, so DEP will switch sampling methods to obtain more representative samples of the groundwater.

- Julia Tillery of GLCC asked to clarify acronyms in the MDE agenda:
 - EMP – Environmental Monitoring Plan
 - PQL – Practical Quantitation Limit
 - RAO – Remedial Action Objectives
 - COC – Constituents of Concern
 - As the result of the meeting with MDE, DEP will start the low flow sampling (filtered and unfiltered) with the Spring 2015 event, planned for March 16, 2015 thru March 27, 2015.
 - After analyzing the sampling results and gathering more data as suggested by MDE, DEP will revise the current groundwater monitoring plan. DEP will discuss with MDE how long to monitor groundwater with the low flow sampling method before reassessing the metals concentrations in groundwater.
 - If the low flow sampling method does not significantly reduce suspended solids in the groundwater samples, DEP will consider the re-development of some of the monitoring wells to further reduce suspended solids in the samples. Mr. Radonic asked that the County let GLCC know when the redevelopment might happen so GLCC can notify the community about the activity on the site.
- c) Discussion of whether waste is in groundwater
- MDE will allow borings through the landfill to assess the depth of waste and groundwater elevations within/under the landfill. This information will be used to better assess the potential effectiveness of a synthetic cap over the landfill.
 - Mr. Karasik stated that MDE questioned why capping was eliminated as an option in the ACM and the primary basis was that if waste is in groundwater, capping will have a limited effect on reducing leachate generation. Borings will help identify the bottom of the waste.
- d) Stormwater Management Plan Updates
- MDE wants updated documentation of stormwater flow off the site to minimize infiltration and leachate generation.
 - Mr. Malladi stated the County identified three small areas on the landfill this week where stormwater was ponding on the landfill. The areas were no larger than 20 feet by 20 feet. When the landfill surface is dryer, the County will have their maintenance contractor re-grade the small areas to improve surface drainage.
 - Mr. Karasik stated the County will perform an updated evaluation of the stormwater runoff using new topography to be obtained in the Spring of 2015.

- e) Timeframes for Achieving Remedial Action Objectives
 - Mr. Karasik stated EA will estimate the timeframes and include them in the updated ACM.
- f) Monitoring Well Spacing
 - MDE requested justification for monitoring well spacing greater than 300 feet, which is MDE's standard for landfill monitoring networks. Construction at 300-ft spacing will require more cuts into the landfill, new access roads, disturbance to streams and forested land, and be very expensive. The County and EA will provide additional justification to MDE and continue to discuss the spacing.
- g) Statistical Analyses
 - MDE would like a better statistical analysis of data trends
 - Mr. Malladi stated that the statistical analysis typically compares upgradient and downgradient concentrations to see if the landfill is impacting the groundwater quality.
 - Mark Gutberlet of EA stated that individual well trend analyses may also be used to assess changes in concentration over time.
- h) Greater Laboratory Precision to Meet MDE Practical Quantitation Limits (PQLs)
 - DEP's current lab, WSSC, does not meet all of the practical quantitation limits (PQLs) required by MDE.
 - DEP will use a laboratory in the future that can attain the PQLs required by MDE.
- i) Monitored Natural Attenuation Discussion
 - MDE stated that MNA was not proven to be effective by the evidence presented in the ACM report and that more justification would be needed if DEP recommends monitored natural attenuation at the site to address RAOs.
- j) Need for a More Specific Contingency Plan
 - MDE would like DEP to be more specific about the contingency if enhanced bioremediation is not as effective as desired.
 - The County will develop more details to revise the ACM report for MDE's review.
- k) Dave Peterson of GLCC asked if the new DEP Director had been briefed about the project and had supported any position related to the remediation or re-use. Mr. Karasik stated that on April 24th the DEP Director was scheduled to visit Gude LF and better understand issues at the landfill.
- l) Mr. Radonic asked if the new MDE Secretary had any impact on the project at this point. Mr. Gutberlet stated that the MDE staff working on the project said the new Secretary has not had any direct impact on the project to date.
- m) Ms. Tillery asked if wood waste processing was still being considered by the County on top of the landfill. Mr. Karasik stated that the County currently only uses designated parts of the landfill as an overflow area for wood waste storage or processing after major storm events when large volumes of felled trees and brush are collected by Highway Services and there is limited space at the Transfer Station. However, DEP still has an interest in relocating yard trim operations from the Transfer Station to a safer location with less traffic and more room and still may propose in the future to use some of the space at Gude Landfill for future yard trim operations.

- 5) Mr. Malladi provided an update on post-closure care activities at the landfill.
- a) Normal maintenance activities continued throughout the year 2014 at regular intervals.
 - b) Landfill Gas Management – Since the installation of the two new deep gas extraction wells in May of 2014, 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 largely in compliance with MDE standards for gas control (i.e., less than 5 percent methane by volume in wells at the property line).
 - c) However, based on last four months methane gas monitoring results, monitoring well 26S exceeded the lower explosive limit (LEL) of 5% by volume of methane gas in every sampling event.
 - d) Ms. Tillery asked about LFG exceedances through the winter. Is the County being proactive about trying to eliminate the exceedances? Mr. Malladi stated that several adjustments to the gas collection system were performed by the County's Landfill Gas Management Contractor, SCS Engineers. On January 16, 2015, SCS did some improvements to the probe by running a vacuum line down the hill and connecting it directly to probe 26. This measure had some short-term benefits but did not completely mitigate the problem.
 - e) On March 12, 2015, SCS proposed to install a horizontal trench with perforated pipe to be tied back into the gas collection system or two additional wells as options and to reduce the elevated methane gas concentrations in well W-26. SCS will develop a cost proposal.
 - f) Pumping of condensate sumps to dewater the landfill's well field is done on a regular basis.
 - g) In November 2014, an annual stack testing on the power plant was conducted as part of the MDE permit requirement. Test results indicated no violations of the air permit for the Gude Landfill gas-to-energy facility. A copy of the air emissions testing report which was sent directly to MDE by the testing contractor is available with the Division of Solid Waste Services (DSWS). Ms. Tillery asked if this could be provided on the website. Mr. Karasik offered that people could review the hardcopy but was not sure if the report was available electronically to post on the website.
 - h) In March 2015, annual emissions report and greenhouse gases report will be submitted to respective agencies per regulatory requirements.
- 6) Mr. Malladi provided an update on stormwater management activities at the landfill.
- a) DSWS completed the annual stormwater discharge inspection in December 2014 per the requirement of General Stormwater discharge permit 12-SW. No stormwater discharge was observed during the inspection.
 - b) Several leachate seeps and ponding areas were fixed throughout the year 2014.
 - c) The crushed stormwater pipe section due to the sink hole behind the large pond at the 600 E. Gude Dr. entrance was repaired and replaced with new pipe sections. The disturbed area has been graded and seeded. The permanent fence will be placed back to secure the pond on March 16, 2015, weather permitting.
 - d) Mr. Karasik stated that the 60-inch corrugated metal pipe along the southwestern corner of the landfill will be evaluated to assess its condition.

Recently Closed Action and Follow-up 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.

Open Action and Follow-up Items

- 34-2 The County will evaluate making the GLCC remediation webpage more accessible from the County's website.
34-3 The County will post a previously-performed LFG composition study and the County Executive's letter to GLCC on the remediation webpage.
34-4 The County post new LFG data as it becomes available after future monitoring.
34-5 GLCC will discuss potential near-term landfill use options they would like the County to consider and communicate them with the County.
35-1 County to review methane results and provide an update to GLCC.
35-2 County to provide air emissions report to GLCC for review.

Tentative next meeting date of June 11, 2015 to discuss any updates.

The above summation is the writer's interpretation of the items discussed at the meeting. Comments involving differences in understanding of any of the meeting items will be received for a period of thirty (30) days from the date of these meeting minutes. Clarifications will be made, as deemed necessary. If no comments are received within the specified time period, the minutes will remain as written.