

### Summary Statement

The Montgomery County (County) Department of Environmental Protection (DEP) has prepared this Fact Sheet to introduce the content and process of the upcoming Assessment of Corrective Measures (ACM) work as well as to provide a current status update for on-going site activities at the Gude Landfill (Landfill). The ACM is the next phase in the remediation investigation at the Landfill, which will include detailed evaluations and analyses of potential corrective measures to bring the Landfill site into compliance with regulatory requirements. The detailed evaluations and analyses will generate recommendations regarding the most feasible and effective corrective measure(s) to be presented to the Maryland Department of the Environment (MDE) for consideration and acceptance (approval). Stakeholders will be kept apprised of the findings of the ACM during project work and will be provided opportunities to review and comment on DEP's recommendations for the Landfill. Upon MDE approval, specific guidance and timelines to implement the selected corrective measure(s) will be provided from MDE to DEP. Land reuse will also be a consideration following MDE approval of the selected corrective measure(s).

For the purposes of a cursory evaluation, DEP prepared and distributed a Remediation Feasibility Memorandum to review and summarize some of the potential corrective measures that may bring the Landfill site into compliance with regulatory requirements on January 11, 2011. DEP also prepared and distributed: a Fact Sheet on the Nature and Extent Study (NES) Report on December 23, 2010; a Quarterly Landfill Newsletter on June 30, 2011; and a Fact Sheet on the NES Amendment No.1 on May 31, 2012. These documents are available on the Landfill Remediation Webpage, which is further detailed in this Fact Sheet.

### Background and Current Status

Prior to the ACM work and at the direction of MDE, DEP prepared the NES Report including additional documentation in the NES Amendment No.1 Report, which were submitted to MDE on November 19, 2010 and November 21, 2011, respectively. The results of the Reports indicated that while there is persistent low level groundwater contamination, occasional surface water detections of contaminants and intermittent landfill gas exceedences from the Landfill site, there are **no risks to public health** for the neighboring residential development of Derwood Station or the recreational users of the Maryland-National Capital Park and Planning Commission (M-NCPPC) trails that are located adjacent to the Landfill site.

MDE approved the collective findings of the above referenced Reports in a letter dated March 13, 2012 (received March 16, 2012 by DEP). Within the approval letter, MDE also stipulated a requirement for DEP to prepare an ACM Work Plan within sixty (60) days of receipt of the letter (by May 15, 2012). DEP submitted the ACM Work Plan to MDE on May 10, 2012. DEP is currently awaiting formal written approval of the ACM Work Plan by MDE.

### Introduction to the ACM

Per the Resource Conservation and Recovery Act (RCRA), the work of the ACM is specified under Title 40 of the Code of Federal Regulations (CFR) Part 258.56. The ACM will identify and evaluate corrective measures to mitigate site issues related to the remedial action objectives regarding: 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 the vicinity of the Landfill site. A general approach to performing the work of the ACM is provided below:

- **Remedial Action Objectives and General Response Actions** – The overall remedial action objectives for the corrective measure(s) will be defined. The objectives will include protecting human health and the environment and meeting regulatory compliance requirements for the Landfill site. The objectives will also be defined as short-term or long-term.
- **Development and Screening of Preliminary Corrective Measure Alternatives** – Preliminary corrective measure alternatives will be identified and evaluated based on their ability to meet the remedial action objectives as well as implementability, effectiveness and cost. The four (4) alternatives that are determined to be the most feasible and effective will be retained for the detailed analysis. Potential preliminary corrective measure alternatives that may be evaluated during the ACM include:
  - Waste Relocation (Selective or Extensive)
  - Bioremediation
  - Phytoremediation
  - Monitored Natural Attenuation
  - Landfill Cover System Improvements and Partial or Full Capping
  - Groundwater Treatment
  - In-Situ Groundwater Barriers
- **Detailed Analysis of Corrective Measure Alternatives Retained from Screening** – Corrective measure alternatives retained from the screening will be analyzed in more detail. The detailed analyses for each corrective measure or the combination of corrective measures will include the review, evaluation and estimation of: compliance with remedial action objectives; short-term and long-term effectiveness/permanence; implementability and schedule; protection of human and ecological health; source treatment and reduction of toxicity, mobility and volume; construction and on-going operational cost; regulatory acceptance; and community or stakeholder acceptance.

- **Recommendations** – Based on the results of the detailed analyses and evaluations, a corrective measure alternative or a combination of alternatives will be recommended to MDE for consideration and approval. Upon MDE approval, the selected corrective measure(s) will then proceed toward detailed design, permitting and implementation.
- **Coordination with Future Land Reuse** – Efforts will be made to coordinate the design, permitting and implementation of the selected corrective measure(s) with potential land reuse alternatives.

### **Community Engagement and Communication**

DEP has been (since June 2009) and will continue to meet with members of the Derwood Station residential development, the Gude Landfill Concerned Citizens (GLCC), through regularly scheduled monthly evening meetings. The purpose of the meetings is to provide information regarding the remediation work activities, site operations, reporting requirements to MDE and to respond to local community concerns regarding the Landfill site. These monthly meetings are open to any interested members of the public. Summaries (Meeting Minutes) of DEP and GLCC meetings are included on the Landfill Remediation Webpage, which is further detailed in this Fact Sheet. DEP has also previously prepared and distributed a Community Communications Plan that identifies major remediation project milestones and associated commitments of the County to the Community.

### **Next Steps and Projected Schedule**

DEP has developed a general list of on-going or future work activities (next steps) regarding the remediation investigation at the Landfill site, which are presented below. The projected schedule to initiate and/or complete each activity is also provided.

- Obtain MDE approval of the ACM Work Plan that was submitted on May 10, 2012. [*August 2012*]
- DEP and GLCC to hold a public meeting to review the NES/NES Amendment No.1 findings. [*September 2012*]
- DEP and GLCC to hold a public meeting to introduce the ACM. [*September 2012*]
- Complete the Land Exchange (Disposition) with M-NCPPC regarding waste encroachment on Park Land. [*September 2012*]
- Complete the Administrative Consent Order with MDE that will document the requirements of the ACM. [*September 2012*]
- DEP to continue working with the GLCC, the Derwood Station residential community, other County Agencies and other stakeholders regarding potential land reuse alternatives at the Landfill. [*on-going*]
- Initiate and complete the work of the ACM. [*September 2012 – June 2013*]
- DEP to hold a public hearing to review the findings of the ACM and associated Report. [*future*]
- Obtain MDE approval of the recommended corrective measure(s). [*future*]
- DEP and all stakeholders to review the integration of selected corrective measures and potential land reuse alternatives. [*future*]
- Initiate design, permitting and implementation of the selected and approved corrective measure(s) and land reuse(s). [*future*]

The Landfill remediation schedule including future land reuse will vary based on the performance of remediation investigations, regulatory review periods, regulatory comments and County responses, procurement processes and coordination with stakeholders.

### **Technical Support**

EA Engineering, Science, and Technology, Inc. (EA) was contracted by DEP through the Northeast Maryland Waste Disposal Authority (NMWDA) to provide technical support during project meetings and to assist with the field investigations, analyses, evaluations and reports associated with the Landfill remediation. EA has been assisting DEP in this capacity since June 2009.

### **County Information Sharing Webpage**

DEP has established a webpage to share remediation and land reuse project information with the Community. The webpage also has an online forum for residents to post questions regarding the Landfill. The webpage and forum address is provided below:

- <http://www.montgomerycountymd.gov/swstmpl.asp?url=/content/dep/solidwaste/facilities/gude/index.asp>

### **County Contact Information**

DEP contacts for the remediation and land reuse project at the Landfill are provided below. Please contact Steve Lezinski, Engineer III, for Landfill monthly evening dates, times and the location.

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