

From: Ed Dexter
To: Peter Karasik
CC: Dan Locke; Martha Hynson; Steve Lezinski
Date: 10/18/2007 8:28 AM
Subject: RE: Use of Gude Landfill for Relocating County Facilities

Dear Mr. Karasik,

I will have Martha Hynson craft a formal response, but in general we try to work with you to reuse old landfills provided you are mindful of some very real concerns which include:

- Not making the infiltration worse; usually means you have to plan the project to increase runoff, and protect the soil surface so that it is not rutted and constantly disturbed. An asphalt pad does nicely, if maintained, as long as the runoff doesn't infiltrate on the fill (e.g., you direct the runoff to ponds off the fill, maybe using lined channels, etc.). Hydraulic infiltration models like HELP can help evaluate proposed changes.
- The risk of explosions: include methane gas protection measures in the design of any enclosed structures, including such things as vents, systems to create positive or negative pressure below the pads of structures, above-ground utility entries and gas seals, and/or alarms as are appropriate. Also, be aware of changes that the construction might have on the pattern of methane gas venting and migration - a pad or parking lot could decrease natural venting that is occurring now, or a utility line with coarse backfill could both increase the distance that explosive levels of gas will migrate, and these need to be evaluated and addressed.
- Settlement issues: differential settlement can crack pads, allowing the intrusion of methane gas into structures, and disrupt utility or surface water drain pipes, increasing infiltration into the fill.
- Chemical risks: Pre-RCRA landfills can contain materials that now would be considered hazardous waste, or which can otherwise present risks to workers onsite. Evaluation of risks to both construction workers during the planned construction, and employees of the new facilities, must be addressed.
- Contingency plans for addressing potential nuisance and pollution conditions that might be encountered during construction, e.g., exposed wastes, leachate outbreaks, and odors that occur during excavation of waste, must be developed.

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I am sure there is more, and we will send you a letter. As long as no new waste is coming in no solid waste permit is required, although the disturbance of closed landfills is governed by our regulations, as Gude did not close until after the regulations went into effect, and State law also requires that they be closed in a manner that prevents nuisances, pollution, and other risks to the public health, safety and comfort. We typically review such plans and issue letters of approval after we are content with them. We are usually willing to go as far as you want - for example, Loyola College is building a sports complex on an old Baltimore City landfill - as long as the issues are satisfactorily addressed.

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>>> "Karasik, Peter" <Peter.Karasik@montgomerycountymd.gov> 10/17/07 5:11 PM
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Ed - Hello. We would like to get your advice on landfill reuse or perhaps have you direct us to the appropriate person on your staff. As Montgomery County has gotten more urbanized, there is tremendous pressure to relocate a number of County maintenance and operations facilities from prime property near the Shady Grove Metro to somewhere else more industrial. We are also trying to relocate our yard waste receiving and grinding operations from the Shady Grove Processing Facility and Transfer Station. We are currently doing design work to relocate the yard waste operations to the old Gude Landfill. Our efforts created interest in other parts of the government to explore relocating other facilities as well. We are aware that settlement, gas management and storm water management issues need to be addressed in the design. What we need your advice on is MDE's position with respect to development

on former landfills and whether there are additional regulatory and environmental requirements that need to be addressed. Gude is a pre-RCRA era landfill that operated from about 1962-1982, so there is no liner and only a soil cap. This creates some options for grading, driving pilings and incorporating other structural features that would not work if a synthetic cap or liner were in place. Thank you for your advice. Please feel free to pass this on, if we should be dealing with someone else.

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