

Gude Landfill Concerned Citizens

**15461 Indianola Drive
Derwood, MD 20855**

May 19, 2009

Martha Hynson, Chief
Landfill Operations Division
Solid Waste Program
Maryland Department of the Environment
1800 Washington Boulevard, Suite 605
Baltimore, MD 21230-1719

Dear Ms. Hynson:

On April 29th the Montgomery County Department of Environmental Protection (DEP) submitted its proposed statement of work for the Nature and Extent Study and proposed Remediation Approach timeline for the Gude Landfill. By copy of that letter, the Gude Landfill Concerned Citizens (GLCC) was invited to comment on the plans and approach. The GLCC offers these comments and recommendations:

Task 2 – Field Survey

We recommend deleting the task (4th bullet) to mark the potential outline of the yard trim processing area. This has absolutely nothing to do with the approach to remediation and appears to be another attempt to avoid MDE direction to not proceed with any aspect of the Yard Trim Project until it has been completely presented to and approved by MDE.

Our community has voiced a clear and resounding objection to any relocation of the commercial wood processing activities to the Gude Landfill site. This Yard Trim site will receive thousands of 18 wheeler trucks and host multiple operations of wood processing equipment such as loaders and tub grinders. The expected wood waste storm water runoff will degrade an already compromised Rock Creek stream. In addition the added weight and vibration of the operating equipment will adversely impact the fragile hydrologic system under the landfill and result in increased contaminate migration.

SOW – Nature and Extent Study

In section C, we recommend that the evaluation include the public marshland 200 yards west-north-west of the Gude Landfill. While not on the landfill border, this area is downhill and collects a lot of landfill storm water runoff. There are also a number of springs in and around the marsh where the first aquifer surfaces.

In section P, we recommend that the exposure evaluation include the potential break through of the contaminated plume into Rock Creek and the inclusion of the human pathway vector

on the entire Rock Creek watershed and the subsequent downstream impacts to the downstream freshwater water intakes. This evaluation should also include the potential impact to the Chesapeake Bay Clean Water plan.

We believe that this plan must acknowledge that there could be human exposure pathways. Not a single heavy metal will evaporate and except during the hottest months in the summer, only minimal VOC's will evaporate, but not before affecting water quality and increasing the bioaccumulation of contaminants. Despite the testimony of a Montgomery County official, the GLCC does not believe that dilution is the solution to the Gude Landfill contamination.

Post Closure Maintenance Activities

We are concerned about Leachate Seep #1 and the DEP statement that there is no evidence of leachate migrating beyond the landfill property. A slope failure or seepage due to the fact that the cap has eroded is a condition that needs to be repaired. Seeping within limits or seeping only on landfill property is not an acceptable environmental solution. To ensure the safety of our neighborhood, we recommend that DEP conduct a single full spectrum water sampling of all seeps/springs within 500 yards of the landfill bounds. Additionally, we recommend an analysis of the landfill contaminate impact, both present and potential, on the Total Maximum Daily Load (TMDL) for the Rock Creek stream segment.

Summary

We appreciate all the efforts that have gone into the preparation of this Remediation Approach, particularly the specific tasks to reach out to the community with public meetings and an information sharing website. The GLCC and our entire community are committed to working with DEP and MDE to ensure a safe and hazard free neighborhood environment.

Sincerely,
Keith Ligon,
GLCC Chairman

cc:

Horatio Tablada, Director Waste Management Administration, MDE
Karen Kumm Morris, MNPPC
Robert Hoyt, Director DEP
Peter Karasik, Section Chief, DEP/DSWS
Daniel Locke, Chief, DEP/DSWS
David Lake, Special Assistant/Office of the Director, DEP
Stephen Lezinski, Engineer III, DEP/DSWS