

GUDE LANDFILL CONCERNED CITIZENS
15461 INDIANOLA DRIVE
DERWOOD, MD 20855

December 11, 2008

Ms. Shari T. Wilson
Secretary
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

Dear Secretary Wilson;

My community is very concerned about environmental issues at the Gude Landfill, in Derwood, Maryland. As Montgomery County officials eye this piece of property for an increasing number of industrial projects, my neighbors and I have discovered some disturbing trends. It has become quite clear that the County does not make it a priority to protect the environment, nor the well-being of adjacent residents as it plans these projects. Montgomery County intends to pursue three projects in the immediate future: a landfill gas-to-energy project, yard-waste processing, and the most disturbing plan, construction of a parking lot with fuel and maintenance facilities for 400 diesel school buses. Here are some of the key issues of each project:

School Bus Depot - This ill-conceived, possibly dangerous plan is what brought our community's attention to the various projects underway at the Gude Landfill. The County intends to put buses as close as possible to our homes, about 50 or 75 yards from us. Montgomery County officials say they can construct the parking lot by driving massive pilings down through 100 feet of toxic waste, until they hit bedrock. While the pilings will certainly create new avenues for groundwater contamination, the County is only focused on engineering a solution to unstable land underneath its buses, fuel tanks, and maintenance facilities.

When the County sought advice from your department, MDE warned about:

- making infiltration worse as a result of increased runoff;
- the risk of migrating methane gas (the risk of explosion, as well as gas migrating to nearby homes);
- settlement issues, further exacerbating infiltration;
- chemical risks to workers during construction, and operations;
- the "nuisance" of exposed waste, leachate outbreaks, odors during construction;

At the same time the MDE made it clear that the County will almost certainly get a green light for this project. "*We are usually willing to go as far as you want,*" your department told Montgomery County.

Landfill Gas-To-Energy Project - This project demonstrates the County's disregard for our health. Montgomery County will install a large internal combustion engine (ICE) within 200 feet of our homes, in order to process landfill gas as an energy source. The choice of technology is poor; there are two flares in place that are more efficient at handling the toxic gas, with less harm to the environment. And there is superior technology available in the form of micro turbines, which do a much better job in nearly every way. The ICE will add more air pollution than any other method available. It will increase dioxins and other contaminants in the immediate area. The County only plans to channel about 20% of the captured landfill gas toward that energy project, while twice as much gas seeps into the atmosphere from fugitive emissions at the surface. At a public hearing on the matter, we asked specific questions, like why the County didn't bother to include a scrubber or carbon filters in its plans, to which the County responded that the engine didn't need those things—the pollutants probably won't hurt the engine. Never has the County considered whether our community is already breathing contaminated air, nor whether adding pollution to our air might be undesirable! The Montgomery Planning Board had no practical say in the matter, since the County signed its contract for the gas-to-energy project more than four months before submitting it to the Planning Board for review.

Yard Waste Processing Facility - My community is wary of the County's plans to use a portion of the landfill property for yard waste processing. It's not simply the daily traffic of huge commercial trucks, the impact of incredible noise from the industrial chippers. There is a trend of environmental disregard emerging. The County's storm water permit has expired, and it is apparently trying to develop a plan to manage the added burden from yard waste processing. Even before the County adds more pollutants to nearby creeks, it ignores a wealth of water monitoring data showing that the Gude Landfill is already contaminating groundwater and surface water in the immediate area. The County internally describes the significance of the contamination, noting it has "only" 600 data points showing the Maximum Contaminant Levels have been exceeded, and it doesn't matter, anyway, since local drinking water comes from the WSSC, not the aquifer. We, in the community, do not understand why the persistent contamination of groundwater and surface water from leachate runoff is allowed to continue unabated. Is the County allowed to ignore years of contamination from cyanide, lead, and other heavy metals and volatile organic compounds? Is that consistent with the storm water permits? We believe not.

A review of historic and recent actions shows a pattern of disinterest by our local government, when it comes to environmental matters at the Gude Landfill. We seek your personal help in curbing this cavalier approach to the toxic effects of Montgomery County's proposals. Our group requests an opportunity to outline relevant concerns in a meeting with you, at your convenience. Alternatively, we can seek guidance and enforcement from the EPA Region 3, Office of Solid Waste, if you believe that might be the more appropriate office.

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We look forward to hearing from you.

Very truly yours,

Julia Tillery

JT/mb

cc: Doug Gansler