



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Secretary

July 6, 2015

CERTIFIED MAIL

Return Receipt Requested

Mr. Peter R. Karasik
Department of Environmental Protection
16101 Frederick Road
Derwood MD 20855

Dear Mr. Karasik:

The Maryland Department of the Environment (the "Department") received your June 10, 2015 letter in response to the Department's deficiency letter regarding the Assessment of Corrective Measures Report ("ACM") for the Gude Landfill. The Department accepts the proposed alternative schedule for completion of the additional field work and revision of the ACM with submission of the ACM Report to the Department by February 29, 2016.

The Department has the following comments regarding the revisions to be made to the ACM Report:

- The County proposes to have its consultant perform statistical analyses following the second round of low flow groundwater sampling. The Department cautions that metal concentrations in groundwater are typically more variable than volatile organic compounds. Please provide information on how the two low flow sampling events will be used to reassess the level and extent of metal exceedances at the site. We also request that the data from the two low flow sampling events be emailed to us prior to submission of the ACM Report, along with its comparison to previous sampling data and the County's interpretation of the results.
- The evaluation of the monitoring well spacing should include a discussion of the complex nature of groundwater flow in fractured bedrock and the effects of a soil cap on infiltration into the landfill which may affect leachate quality and quantity.
- The new groundwater contour map should include water elevation data from the existing wells and streams surrounding the site. The Department requests that the work plan to drill borings through the landfill be submitted to us for our review. The work plan should include methods for demonstrating that water levels in the borings are representative of regional groundwater and not perched leachate. More than one cross section should be developed.

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Montgomery County, MD

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DEP - SWD, Transfer Station
16101 Frederick Road
Derwood, MD 20855



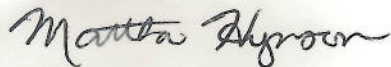
Mr. Peter R. Karasik

Page 2

- The drainage analysis should include infiltration rates and potential for infiltration on all areas of the cap. This may include utilization of the HELP model with appropriate assumptions for the different areas of the site including slope, soil type, and type of vegetative cover.
- The Department assumes that the new Groundwater and Surface Water Monitoring Plan will be submitted by the end of February 2016. If this is not the case, please let us know when the plan will be submitted.

If there are any questions regarding the comments in this letter, please contact Mr. Ed Carlson, Head of the Investigations and Remediation Section, at (410) 537-3315.

Sincerely,



Martha Hynson, Chief
Solid Waste Operations Division

MH:ATG:atg

cc: Ms. Hilary Miller
Mr. Brian Coblentz
Andrea Baker, Esq.

