




OFFICE OF THE COUNTY EXECUTIVE
ROCKVILLE, MARYLAND 20850

Isiah Leggett
County Executive

MEMORANDUM

December 19, 2013

TO: Craig Rice, Council President

FROM: Isiah Leggett, County Executive 

SUBJECT: Gude Landfill Remediation Project – Recommended Alternative

The purpose of this memorandum is to provide the County Council with an update on the Gude Landfill Remediation Project and outline my recommended alternative for remediation. Under a Consent Order executed by the County and the Maryland Department of the Environment (MDE) in May 2013, the County is required to perform various investigations and remediation at the Gude Landfill. The next formal step in the process is for the County to submit an assessment of corrective measures report and recommended remediation alternative to MDE by January 31, 2014.

The Gude Landfill Assessment of Corrective Measures (ACM) Report prepared by our technical consultant, EA Engineering, Science and Technology, Inc., outlines a range of remediation options and evaluates five specific alternatives in detail from a technical and cost perspective. I plan to recommend to MDE that the County implement the corrective measures identified as “Alternative 5” in the ACM Report because this approach best meets the County’s needs from both a technical and cost perspective and minimizes community impacts. This recommendation has been closely coordinated with members of the Gude Landfill Concerned Citizens (GLCC), which represents the homeowners in Derwood Station South (the community that is adjacent to the Gude Landfill), and MDE, which has been consulted regarding the acceptability of certain technologies and approaches.

Alternative 5 requires implementation of the following measures: (1) enhanced bioremediation to reduce groundwater contaminants; (2) additional landfill gas collection to better control the potential for gas migration; and (3) cover system improvements to decrease the occurrence of leachate seeps on side slopes. I am attaching Section 5.5 of the ACM Report, which provides an overview of Alternative 5, and Appendix G to the ACM Report, which outlines a proposed work plan for implementation of Alternative 5. A copy of the entire ACM Report and all Appendices can be found on the “Gude Landfill Remediation Project” website maintained by the Department of Environmental (DEP) under the link to “MDE Approvals, Plans and Consent Order.”

The enhanced bioremediation component of Alternative 5 will be implemented by drilling wells through waste to the soil, bedrock and groundwater below the landfill and injecting a food source for microorganisms to accelerate and enhance their ability to break down pollutants in the groundwater. Typically, bioremediation injection wells are not constructed within the waste footprint (i.e., drilled through the trash). However, because the waste footprint at the Gude Landfill approaches the landfill's property boundary, we hope to use this innovative approach rather than conducting extensive waste relocation. Waste relocation, as outlined in other options, would be expensive and create a significant and lengthy disturbance to the surrounding community related to vehicle traffic, equipment noise, odor and dust.

If MDE approves the implementation of Alternative 5, the County will utilize an adaptive management approach to the remediation. Corrective measures will be initiated, monitored closely and adjusted to ensure that they are improving groundwater quality and reducing gas migration and leachate seeps. While Alternative 5 is based on proven technology, its pace of effectiveness will be determined by the unique characteristics of the Gude Landfill. Enhanced bioremediation will occur in two phases, with Phase 1 conducted in a limited area during the first three to five years and lessons learned during that period applied to remediation plans for the rest of the landfill during the second phase. We will not initiate full-scale remediation for the entire site in Phase 2 until we have fully evaluated the results of enhanced bioremediation in the Phase 1 limited area and are satisfied that the bioremediation program is successfully reducing concentrations of groundwater contaminants.

We estimate that the annual cost of implementing Alternative 5 over the next 20 years will range between \$484,000 and \$2.6 million each year, depending on the implementation plan for each particular year. The estimated total cost over this 20-year period is \$57 million (not including inflation). The estimated expenditures for each of the first 12 years of the project are outlined in Attachment 3. Actual annual expenditures may increase or decrease depending on results obtained throughout our adaptive management of the remediation project. Upon receiving approval from MDE, I will submit a funding plan to Council, along with any related appropriation request or amendment to the Capital Improvement Plan (CIP). We estimate that the MDE review and approval process will take at least 6 months. So, it is not likely that I will submit a funding plan until sometime in FY15 at the earliest.

With regard to potential land reuse options at the Gude Landfill site, the GLCC has expressed a desire for passive recreational uses such as running/walking trails, garden plots, a dog park, a children's play area, a model plane flying area and a picnic area. I agree that some passive uses may be feasible to implement during the first three to five years of remediation as long as the uses can be adjusted to accommodate refinements or changes in the remediation efforts. Once MDE approves the ACM Report and recommended corrective measures, we will work with the community to explore possibilities for design and placement of some of these passive uses to the extent that they are consistent with the planned remediation activities. With

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respect to the long-term reuse of the site, the County has not yet developed long-term plans and I think it is best that we defer those decisions until the first phase of the remediation is complete and decisions have been made regarding remediation of the rest of the landfill. We should then evaluate what we have learned about requirements and impacts during remediation and consider options for long-term reuse.

As mentioned above, the deadline for submitting my recommended remediation alternative to MDE is January 31, 2014. If you have any questions about the ACM Report, my recommended alternative or any other aspect of the Gude Landfill Remediation Project, please contact Bob Hoyt, Director, DEP at 240-777-7781 or Dan Locke, Chief, Division of Solid Waste Services, DEP at 240-777-6402. They will gladly make themselves available to support Council as it considers this matter.

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cc: Keith Ligon, Chairman, Gude Landfill Concerned Citizens (GLCC)
Bob Hoyt, Department of Environmental Protection
Jennifer Hughes, Director, Office of Management and Budget
Joseph Beach, Director, Department of Finance
Dan Locke, Chief, Division of Solid Waste Services, Dept. of Environmental Protection

Attachments (3)