



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

January 7, 2022

Mr. Steve Fleischman
National Waste Managers, Inc.
2900 Linden Lane, Suite 300
Silver Spring, Maryland 20910

Dear Mr. Fleischman:

On Nov. 9, 2021, the Maryland Department of the Environment (MDE) received the revised Phase III Engineering Plans and Specification Report addressing MDE's Oct. 22, 2021 comments for the proposed Chesapeake Terrace Rubble Landfill. The revised Report was prepared and submitted on your behalf by Advanced Geoservices.

In order for MDE to consider the Report complete, the comments below must be fully addressed and submitted to us for review and approval.

1. Response to Comment #8 states that "NWM may in the future seek MDE approval to utilize the GCL over the 24 inch thick prepared subbase." Please note that the future request would be a material alteration that would require a public hearing prior to approving the request.
2. Response to Comment #29, reiterates the possibility to seek in the future MDE's approval to utilize the GCL over the 24-inch prepared subbase. Please see the response in comment 1 above.
3. Response to Comment #75 states Section VI E of Attachment 16C has been revised to include monthly water level readings in monitoring wells. The Section referenced appears to be incorrect. Section IV E includes the revision. Additionally, Section II.B of Attachment 16C does not reflect the monthly water level reading requirement for landfill wells. Please ensure all components of Section 16 are consistent.
4. Comment #102b was not addressed. Detail 9/88 is still referenced on drawing 88. Please revise the drawing.
5. Comment #104, MDE does not accept the July 2020 acetone detection in MW-22 as background for the well. Despite not being able to definitively determine a source for the acetone, the detection coincides with similar detections in a blank, the matrix spike, and duplicate from that round of sampling. Considering that acetone had not been previously detected in MW-22, the weight of evidence supports that the July detection is not valid. Future groundwater analysis and

Mr. Steve Fleischman

Page 2

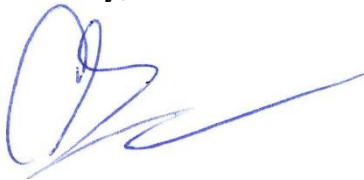
statistics cannot include acetone in MW-22 as background. Please revise the July 2020 data appropriately.

6. Comment #107, MDE previously requested Section 6.4.1 of the Phase II be revised to correct a suspected misreported pH value of 18.2 SUs. The response to comment identifies replacement page 6-4. The page provided is 6-3 and still includes the pH value of 18.2. Please provide a correctly revised page from the Phase II application.

In addition, please be advised that once the permit is issued, you will not be allowed to commence acceptance of waste until the proposed new wells are installed, and 4 rounds of data are collected from these wells to establish the background data for the site.

Please refer to the document control number **1993-WRF-0225** when writing MDE regarding this application. If you have any questions concerning this matter, please contact Ms. Sara Haile, Project Manager at (410) 537-3315 or sara.haile@maryland.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Grenzer', with a long horizontal flourish extending to the right.

Andrew Grenzer, Chief
Solid Waste Operations Division

cc: Warren Halle, National Waste Managers, Inc.
Paul G. Stratman, Geologist Consultant, Advanced Geoservices
Kaley Laleker, Director, Land and Materials Administration (LMA) LMA/MDE
Brian Coblenz, Chief, Compliance Division, Solid Waste Program (SWP) SWP/LMA
Sara Haile, Project Manager, Construction and Maintenance Section, SWP/LMA