

March 6, 2026

Mr. Andrew Grenzer
Chief, Solid Waste Operations Division
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

**Subject: Response to Comments: Phase III Report
Millersville Landfill and Resource Recovery Facility
Severn, Maryland**

Dear Mr. Grenzer:

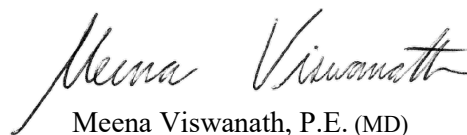
This letter has been prepared by Geosyntec Consultants (Geosyntec) in response to your March 3, 2026, letter regarding your review of the Phase III Report for the proposed vertical expansion of Cell 9 at Millersville Landfill and Resource Recovery Facility located at 389 Burns Crossing Rd in Severn, Maryland. Please find attached a detailed response to each comment made in your March 3, 2026, letter as well as two copies of the updated text and Appendices A and B.1 of the Phase III report for your review.

If you would like to discuss any of the content of this letter, please do not hesitate to contact the undersigned at 410.910.7695 or mviswanath@geosyntec.com.

Sincerely,



Daniel Espinoza, E.I.T
Professional



Meena Viswanath, P.E. (MD)
Senior Engineer

Response to Comments

Comments from the Maryland Department of the Environment (MDE) are numbered below consistent with the comment letter provided on 15 January 2025. Responses appear in *blue italics* below each comment. Quoted text is shown in “quotes” and new text added to each report is shown in **bold**.

Comments on the Narrative Report

1. The Permit Number 2022-WMF-0240 for the proposed Cell 9 VE on the title page is wrong. The Control/Permit Number assigned for the proposed Cell 9 VE is 2023-WMF-0240A. The assigned permit number for the project must be corrected on the title page and other portions of the Phase III Report.

The permit number has been corrected to 2023-WMF-0240A on the title page and in Sections 1.1, 2.1, 2.4, and 5.2.

2. Page 6, Section 2.3 Requirements of 40 CFR Part 258 did not contain the Recordkeeping Requirements under 40 CFR §258.29. This requirement must be included as part of the Phase III Report.

The updated text in Section 2.3 now cites the 40 CFR Part 258 recordkeeping requirements and references the Operations Guide (Appendix B) for description of the recordkeeping at the site.

3. Page 9, Section 2.3 Requirements of 40 CFR Part 258 did not include the Financial Assurance Criteria under Subpart G that addresses the Financial Assurance requirements for closure, post-closure care and corrective action for the proposed expansion of the landfill under 40 CFR §258.71, 40 CFR §258.72, and 40 CFR §258.73 respectively. Please include the Financial Assurance information in the revised Phase III Report.

The 40 CFR §258.71, §258.72, and §258.73 financial assurance requirements have been added to Section 2.3. The requirements are addressed in the report as follows:

The site demonstrates compliance with these requirements using the mechanism of the Local Government Financial Test (§ 258.74(f)). The County meets the public notice requirement by referencing the closure and post-closure costs in the comprehensive annual financial report. Additionally, Anne Arundel County has established a Solid Waste Financial Assurance Fund in local law and makes annual contributions for future closure and post-closure costs. The County will maintain the record of financial assurance documentation required by Subpart G as noted in the Operations Guide (Appendix B).

The report also provides links to documentation of meeting the Local Government Financial Test, the comprehensive annual financial report, and the County regulation requiring a Solid Waste Financial Assurance Fund.

4. Page 14, Section 3.5 Existing Closed Landfills states "Multiple closed landfills are present at the facility." Please revise this statement to say that multiple closed cells are present at the facility.

Section 3.5 has been revised as directed.

5. Page 24, Section 8.4 Stockpile Locations, states that as the construction of the remaining subcells progresses, the stockpiles will be located elsewhere without including the area(s) of the facility that would be tentatively suitable for stockpiling. The revised Phase III should include the anticipated location(s) for stockpile prior to the construction completion of the last subcells.

Section 8.4 has been revised as follows:

“As construction moves into Subcells 9.4 and 9.5, the stockpiles will be relocated elsewhere in MLFRRF across previously constructed subcells, either as large individual stockpiles or spread out over the entire footprint to minimize the height of the piles. These areas will be stabilized according to the approved soil erosion and sediment control plans.”

6. Page 27, Section 10.5 Fire Control must be revised to include in the emergency procedure and operations manual, a statement that “In case of a fire such that emergency fire service responds, the County must notify the MDE/SWP in writing within 72 hours of fire occurrence and schedule a follow-up site inspection.”

Section 10.5 of the Phase III report has been revised as directed.

7. Page 37, Section 13.1 Drainage and Stormwater Management Overview states that stormwater and erosion and sediment (E&S) control designs will be submitted, reviewed, and approved by the appropriate local agencies prior to construction. The approved Stormwater Management Plan and E&S Plan must be approved and submitted to MDE/SWP prior to issuance of a permit.

Section 13.1 has been revised as follows:

“The design and methods for controlling on-site drainage and stormwater runoff associated with the vertical expansion are presented in this section. As required by COMAR 26.04.07.08.B(12), stormwater and erosion and sediment (E&S) control designs will be submitted, reviewed, and approved by the appropriate local agencies prior to construction of each subcell and closure. The approved E&S plan for each subcell and closure will also be submitted to MDE/SWP prior to the start of construction. Stormwater management plans will be reviewed by the County for conformance with Anne Arundel County’s Stormwater Management Code. The Anne Arundel County Soil Conservation District (SCD) will also review stormwater management plans for conformance with COMAR 26.17.01 requirements for E&S control. As noted below, an approved E&S plan for the site is included as Attachment I and a submitted stormwater concept plan is submitted as Appendix H.2. The approved stormwater concept plan will be submitted to MDE/SWP prior to issuance of the permit.”

8. Page 62, Section 20 Construction Implementation Schedule, second bullet states “After completion, a Construction Certification Report will be submitted to MDE.” Please revise this statement to state that the Construction Certification Report will be submitted to MDE/SWP within 90 days following completion and approval of construction.

Section 20 has been revised as directed.

9. Appendix B.1 is titled 2024 Addendum, but contains an addendum dated October 3, 2025. Please rename the Appendix to 2025 Addendum to reflect the date of the addendum.

Appendix B.1 has been retitled as 2026 Addendum to reflect that it is now being submitted with a date of March 6, 2026.

10. Appendix B.1, Operations Guide Addendum, Page 5, Section 10.2.1 - Landfill Fires. Please add the statement “In case of a fire such that emergency fire service responds, the County must notify the MDE/SWP in writing within 72 hours of fire occurrence and schedule a follow-up site inspection.” (see comment No. 6).

Section 10.2.1 in the Operations Guide Addendum has been revised as directed.

11. Appendix B.2 2018 Operations Guide, Page 49, Section 5.5.1 Daily Cover states "At the beginning of the next workday, the previous day's soil cover will be removed to the extent possible and set aside for later re-application on an as needed basis." Please revise this section of the Operations Guide. Daily soil cover must remain in place and may not be removed for later re-application.

Appendix B.2, the 2018 Operations Guide, was approved by MDE on November 2, 2018 and has been implemented at the site since. The only changes proposed to the Operations Guide, which are included in Appendix B.1, are those related to the vertical expansion of the landfill. No change to the operations relating to daily cover are proposed.

Comments on the Engineering Drawings

1. Drawing 11 of 30, Landfill Sections. Please include the slope of the Top of Final Cover on Profiles B and C, demonstrating compliance with the COMAR 26.04.07.21 requirement for the cap to be installed with a minimum slope of 4 percent to facilitate drainage.

The slope of 5% has been added to the requested profiles.

2. Drawing 25 of 30, Stormwater Management System Details 1, Detail 4/10 refers to Note 3. Note 3 states “Gabion thickness and fill per manufacturer’s recommendation.” Detail 4/10 does not depict a gabion. Please review the reference to the note and correct.

The reference to Note 3 has been removed.

3. Drawing 26 of 30, Stormwater Management System Details II, Detail 2/26 Perimeter Drainage Channel shows the slope of the prepared subbase as 3:1 and references Note 1. Note 1 states “Gabion thickness and fill was selected per manufacture’s recommendation.” The note does not belong with the subbase slope. Please correct the location of the note.

The reference to Note 1 has been removed.

4. Drawing 28A of 30, Landfill Gas Management System Plan II depicts LFG Condensate Sump CS9-2 and references Detail 2/29. Detail 2 on page 29 is the Gas Control and Isolation Valve detail. A condensate sump detail was not found in the drawings. Please provide the condensate sump detail and correct the detail reference on Drawing 28A.

The detail for the condensate sump has been added as Detail 6 on Drawing 29. The detail references on Drawing 28 and Drawing 28A have been updated.

5. Drawing 29 of 30, Landfill Gas Management System Details, Detail 1/28A Vertical Landfill Gas Well and Wellhead includes a soil backfill layer that references Note 6. Note 6 states “If alternative final

cover system is selected, lateral piping will lay on top of the final cover system.” Please move the note 6 reference to the final cover soil layer in the detail. The soil backfill layer is not impacted by the final cover system.

The reference to Note 6 has been moved to the final cover soil layer in the detail.

Comments from other Interested Parties

1. If more than 5 acres of land will be disturbed the site must have an approved 20CP stormwater construction permit. Changes on site must be reflected in the site’s Stormwater Pollution Prevention Plan (SWPPP) and the document may need to be updated. If you have any question about this comment, please contact Joey Dickson in Maryland Department of the Environment’s Industrial Stormwater Permits Division at joey.dickson@maryland.gov.

We acknowledge the comment. Section 13.2 of the Phase III report notes the following:

“The MLFRRF currently has coverage for stormwater discharges associated with facility operations under the 20-SW. This permit is included as Appendix H.1. Additionally, the MLFRRF will apply for coverage under the 20-CP prior to construction of each subcell. The MLFRRF currently has a 20-CP permit for construction of Subcell 9.3. That permit is also included in Appendix H.1.”