



March 2, 2026

Michael L. Porath, Landfill Manager
Waste Management Services
Anne Arundel County
389 Burns Crossing Road
Severn, Maryland 21144

Dear Michael L. Porath:

On Oct. 20, 2025, the Maryland Department of the Environment, Solid Waste Program (MDE/SWP) received a document entitled “Phase III Report, Cell 9 Vertical Expansion” (Phase III Report), consisting of Volumes 1 of III through III of III and including Drawing Nos. 1 of 30 through 10 of 30, 10A of 30, and 11 of 80 through 28 of 30, 28A of 30, and 29 of 30 through 30 of 30 for the proposed vertical expansion of existing Cell 9 at the Millersville Municipal Landfill and Resource Recovery Facility. The landfill is located at 389 Burns Crossing Road, Millersville, Maryland. The Phase III Report was prepared and submitted on your behalf by Geosyntec Consultants, Inc.

MDE/SWP has completed its review of the Phase III Report and has the following comments that must be addressed and submitted for our review and approval:

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.
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.
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.
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.

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.
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.”
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.
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.
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.
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).
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.

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.
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.

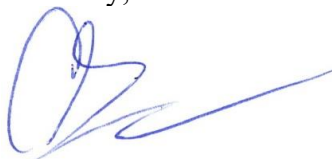
3. Drawing 26 of 30, Stormwater Management System Details II, Detail 2/26 Perimeter Drainage Channel shows the slope of the prepared subbase as 3:1 and references Note 1. Note 1 states “Gabion thickness and fill was selected per manufacture’s recommendation.” The note does not belong with the subbase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

Comment 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.

If you have any questions concerning this matter, please contact Allison Marong, Project Engineer at (410) 537-3315 or allison.marong@maryland.gov.

Sincerely,



Andrew Grenzer, Chief
Solid Waste Operations Division

cc: Meena Viswanath, Geosyntec Consultants, Inc.
Rick Kessler, Director, Land and Materials Administration (LMA)
Seun Akinlotan, Administrator, Solid Waste Program (SWP), LMA
Brian Coblentz, Division Chief, Compliance Division, Land & Materials Administration (LMA)
Samuel Ogbogu, Ph.D., Section Head, Construction and Maintenance, SWP/LMA