

Comment by Anne Fenerty, June 1, 2015

This is a comment on the recently posted contact record RFLMA -- CR 2015 Immediate Response to Recent Precipitation of the OLF cracking and slumping.

Since most of these contact records are automatically approved by CDPHE we will now have digging at the Original Landfill in spite of regulatory prohibition. This dump includes an unknown number of toxic chemicals and radioactive compounds. It is unlined, 40' deep and covers 20 acres.

The present problems could have been avoided had the landfill closure been done as required by RCRA and recommended by an independent scientist.

10 years ago as members of DOE's Independent Verification Committee we looked at the planned remediation of the Original Landfill. Dr. Dwyer of DOE's Sandia Lab. was very critical of the plan. Closure of hazardous material landfills require several layers of protective material, called a RCRA "C" cover. Instead DOE decided to call it a sanitary landfill and threw 2 feet of dirt on it.

OLF is in a high erosion area in a floodplain. This closure did not isolate it from the groundwater flowing through it and the surface water flow over it.

We are given statements like none of the Refuge soil is over 7pCi/g soil --pulled out of thin air -- by Scott Surovchak. Yet DOE's own expert expert, scientific recommendations are not accepted.

Had the RCRA rules been followed the public would not now been exposed to the present situation.

I am enclosing a summary of the Dwyer report.