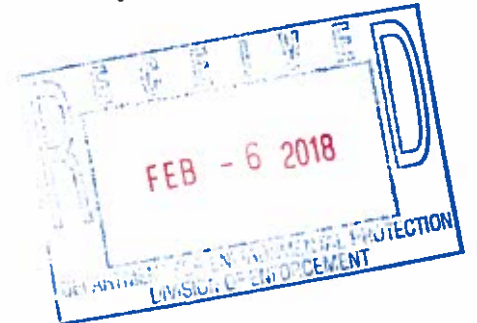


Thomas H. Hart
6405 Old Landing Rd.
Irvine, KY 40336

31 January 2018

Mr. Jeff Cummins
Director, Division of Enforcement
300 Sower Boulevard Lane
Frankfort, KY 40601



Ref: Agency Interest No. 998 and Agreed Order DWM – 160048

Dear Mr. Cummins:

I believe that Remediation Alternative 1 detailed in this Corrective Action Plan (CAP) for the Blue Ridge Landfill, Estill County, Kentucky is the appropriate course of action to pursue in mitigating the public health risk posed by the illegally dumped TENORM in the Blue Ridge Landfill. Closure-in-Place and Monitoring, with the enhancements specified in the CAP, provides the greatest short term and long term protection of human health and the environment. With that said, I would suggest some changes/additions to the document to add clarity and emphasis concerning the Interim Remedial Measures Plan and what constitutes the enhanced final cap over the landfill at closure. Also, a couple of additions to the contact list found in Attachment C: Weaver 2017 Radioactive Material Screening Plan seem appropriate.

Recommended Changes to the CAP for the Blue Ridge Landfill

1. Executive Summary, p. ES-2, under Alternative 1. There is no mention of the Interim Remedial Measures Plan (IRMP) and its associated Interim Cap.
2. Section 4.2.1.
 - a. First paragraph: The interim cap is mentioned here, but the enhanced final cover is not.
 - b. Without going into final design detail, some general design criteria for both the interim cap and the enhanced final cap should be included in the CAP (i.e., components, thickness). This would hopefully preclude any misunderstanding in the future about what constitutes and adequate interim cap and enhanced final cap.
3. Section 6.3.2, last paragraph. There is no mention of the Interim Remedial Measures Plan (IRMP) and its associated Interim Cap.

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4. Section 7, second paragraph, last sentence. There is no mention of the Interim Cap required by the IRMP.

5. CAP, Attachment C: Radiation Screening and Monitoring Plan. The Emergency Contact List should be expanded to include: 1) Estill County Solid Waste Coordinator (606)723-7524, and the Estill County Health Department Environmentalist (606)723-5227.

Thank you for your efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas H. Hart", with a long, sweeping horizontal flourish extending to the right.

Thomas H. Hart, Colonel, USAF (Ret)