



## Department of Energy

Portsmouth/Paducah Project Office  
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JUL 12 2007

Mr. Allen Burnett, Chair  
Citizens Advisory Board  
111 Memorial Drive  
Paducah, Kentucky 42001

PPPO-02-456-07

Dear Mr. Burnett:

**RESPONSE TO CITIZENS ADVISORY BOARD CONSENSUS  
RECOMMENDATION 07-04 (ASSURANCE OF COMPLIANCE WITH THE  
WASTE ACCEPTANCE CRITERIA AT THE C-746-U LANDFILL)**

The U.S. Department of Energy (DOE) is in receipt of the Citizen Advisory Board's (CAB) Consensus Recommendation 07-04, dated January 18, 2007. The CAB recommended that DOE assure strict compliance with the Waste Acceptance Criteria (WAC) for the C-746-U Landfill. The means to achieve this assurance should consider: (1) the adequacy of WAC flow down into operating procedures; (2) a thorough review of WAC importance and details with all waste generators, landfill operator, and contractors; (3) an evaluation of sampling protocol adequacy; and (4) establishment of an oversight program to periodically evaluate performance against the WAC.

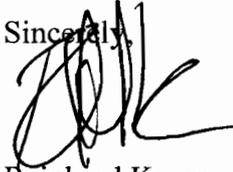
As discussed in the January CAB meeting, the ability to operate the C-746-U Landfill is critical to the DOE's cleanup mission at the Paducah Gaseous Diffusion Plant (PGDP). Additionally, DOE and its contractors are well aware of the responsibilities regarding regulatory compliance. To ensure continued regulatory compliance at the C-746-U Solid Waste Landfill, DOE and its contractors have reviewed and revised, as appropriate, the sampling protocols and the programmatic and operational procedures used to assure strict compliance with the WAC. The review was completed as a part of the contractor's Plan of Correction submitted to the Commonwealth of Kentucky in response to release of liquids into the landfill in 2004. DOE and its contractors will continue to monitor the success of implementing those procedures.

The WAC is incorporated into landfill operating procedures PRS-WSD-3025, and PRS-WSD-0017. The landfill manager is responsible for reviewing waste packages and verifying that they are compliant with the landfill WAC. In addition to training for the landfill manager and operators, the importance of properly implementing the WAC is continually emphasized to waste generators and landfill operators at the PGDP.

Both DOE and its contractors have an oversight program that evaluates contractor performance and regulatory compliance. DOE will ensure a review of WAC compliance and flowdown is completed within six months of the date of this letter.

DOE appreciates the efforts of the CAB to assure waste management practices are being performed in a safe and compliant fashion. If you have any questions or require additional information, please contact Mitch Hicks at (270) 441-6820.

Sincerely,

A handwritten signature in black ink, appearing to read 'RK', written over the word 'Sincerely,'.

Reinhard Knerr  
Paducah Site Lead  
Portsmouth/Paducah Project Office

cc:

D. Frost, EM-13

M. Hicks, PPPO/Paducah

W. Murphie, PPPO/Lexington

R. Roberts, EHI/Paducah