Recommendation to Dr. Ines Triay, Assistant Secretary of the Department of Energy for Environmental Management
No. 2009-08

Northern New Mexico Citizens' Advisory Board

Establish an Effective Policy and Funding For Recycling of Valuable Materials From Environmental Restoration Work at DOE Sites

Background

At several recent Site Specific Advisory Board (SSAB) Chairs' meetings, several site boards, including the Northern New Mexico Citizen's Advisory Board (NNMCAB), have raised the issue of recycling of valuable materials, most urgently regarding the large amount of high purity nickel currently stored at the Oak Ridge Reservation. This is only one example of the resources that can be recycled into the American economy, with great overall benefits to both commercial and government projects.

In particular, with the renewed interest by Congress in funding accelerated cleanup programs at our Legacy Waste sites, the demolition of structures, dismantling of equipment and reduction of stored materials will be occurring at a rapid rate. Much of this residue from demolition is valuable material, or can be processed into valuable material, such as nickel, mercury, lead, etc. Even less valuable materials, taken in the large volumes expected site-wide, may have significant recycle value.

Some of this material may be contaminated with trace amounts of radioactivity. There are currently large industrial users of these materials with programs in place to maintain the strict controls and quality assurance to safely transport and process the materials. An example of such use is in the fabrication of components for nuclear grade applications. Nickel with trace radioactivity can be used in the manufacture of Inconel tubes for steam generators in nuclear plants.

However, a national policy for recycling valuable materials, especially those with trace radioactive contamination, is necessary before the American economy can benefit from using the byproducts of our environmental restoration effort.

We note that some efforts at recycling have been attempted at certain sites. For example, at Oak Ridge, a Federal staff member has been assigned to find alternate uses for recyclable materials other than permanent disposal. However, this effort has been ineffective for several reasons. The initiative for recycling has been left to the contractors, and they currently have no contractual incentives to develop innovative approaches. The issue of trace radioactive contamination has not been addressed by the regulatory authorities, so uses for this category of material are not allowed. The funding for recycling is not specifically delineated in budgets, and the use and benefit sharing from recycling profits has not been addressed by the Department of Energy (DOE.)

Recommendations:

1. The NNMCAB recommends that DOE initiate a coordinated Federal effort to develop as quickly as practical, an effective national policy for recycling valuable materials salvaged from the environmental restoration efforts at legacy sites throughout the DOE complex.

2. The NNMCAB recommends that DOE consider budget modifications for FY10 and future years to support implementation of recycling policy direction.

3. The NNMCAB recommends that contract language be developed and implemented to provide incentives for Environmental Management (EM) contractors to support the recycling policy.

Intent

The intent of this Recommendation is to provide the United States with a policy to effectively utilize the valuable materials obtained from recycling the demolition residue from environmental restoration projects, and thus provide reduced long-term disposal requirements and financial benefit to our economy.

Effect

The effect of this Recommendation will be to demonstrate leadership by the DOE in implementing recycling into the environmental programs, and to help the overall economic recovery of the country by reusing valuable materials in important projects.