



Recommendation 13-01
January 10, 2013

*Portsmouth EM Site Specific
Advisory Board*

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RECOMMENDATION 13-01: The Portsmouth (PORTS) Environmental Management (EM) Site Specific Advisory Board (SSAB) fully endorses a lifting of the U.S Department of Energy (DOE) suspension of non-contaminated scrap metals from radiological areas at DOE facilities, including the Portsmouth Gaseous Diffusion Plant.

BACKGROUND: In December 2012, the U.S. Department of Energy (DOE) released a draft Environmental Assessment for public comment on the potential recycling of non-contaminated scrap metals from radiological areas at DOE facilities.

DOE has studied the ban in recent years and Secretary of Energy Steven Chu approved an action last year that could allow DOE under secretaries to manage non-contaminated metals at DOE sites. That action was contingent on the completion of the Environmental Assessment, which now has a public comment period through February 11, 2013. DOE will decide if a programmatic environmental impact statement is necessary or will issue a finding of no significant impact. A finding of no significant impact would result in changing the suspension policy, which has been in existence since 2000.

The material covered in the environmental assessment does not deal with volumetrically contaminated materials. A DOE moratorium prohibits the recycle of those materials.

RECOMMENDATION: The PORTS EM SSAB fully endorses a lifting of the DOE suspension of non-contaminated scrap metals from radiological areas at DOE facilities, including the Portsmouth Gaseous Diffusion Plant. The board endorses this action for the following reasons:

- 1) The board is confident a rigorous oversight program for the public and workers, through the Office of Environmental Management's adherence to DOE Order 458.1, will ensure safety to workers at the Portsmouth Gaseous Diffusion Plant as well as the public that all metals will meet release criteria. The board fully understands that current release criteria would still be applicable and that this action in no way represents a reduction of standards.
- 2) The board sees the lifting of the suspension as a key first step to the establishment of a large scale recycling and reuse program at the Portsmouth Gaseous Diffusion Plant that will benefit our community and communities across the nation. The board endorses the implementation of advanced technologies for the recycle of surface-contaminated metals in a manner that would be in compliance with DOE Order 458.1 and meet all release criteria. The board further recommends the creation of a pilot demonstration project, which will lead to full scale commercialization.
- 3) The board believes lifting the suspension will have a complex-wide benefit to DOE by reducing the footprints for potential on-site disposal cells and/or transportation costs for waste materials.

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- 4) The board wants to thank DOE for its Asset Transition Agreement with our Community Reuse Organization, the Southern Ohio Diversification Initiative (SODI). Obviously, an increased emphasis on the recycling of metals in a manner that is safe for human health and the environment will have a significant impact on our community. That is true not only because of the DOE-SODI agreement, but because of the potential for a national recycling center for metals from radiological areas (as described above) that would put us at the forefront of what is sure to become a thriving industry.

In closing, the board would like to point out the suspension is counterproductive and unnecessarily prohibits the safe and economically beneficial recycling of these metals. The lifting of the suspension would be a critical step in furthering DOE missions, improving cleanup programs around the nation and benefitting countless communities where DOE operations exist.