

Recommendation 08-07
July 17, 2008



Paducah Gaseous Diffusion Plant
Citizens Advisory Board

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Approved at the Citizens Advisory Board Meeting, July 17, 2008

Title: Recycling, Reclamation and Reuse of Materials at the PGDP

Background:

The Paducah Gaseous Diffusion Plant (PGDP) was placed on the National Priorities List on May 31, 1994. In accordance with Section 120 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the U.S. Department of Energy (DOE) entered into a Federal Facility Agreement (FFA) with the U.S. Environmental Protection Agency and the Commonwealth of Kentucky on February 13, 1998. The FFA established one set of consistent requirements for achieving comprehensive site remediation in accordance with the Resource Conservation and Recovery Act and CERCLA, including stakeholder involvement.

The site cleanup approach at Paducah includes a series of prioritized response actions designed to protect human health and the environment with emphasis on achieving significant risk reduction in the near term, while minimizing disruptions to the ongoing uranium enrichment plant operations. In addition, it also includes ongoing site characterization activities to support future response action decisions, Decontamination and Decommissioning (D&D) of 17 currently inactive DOE facilities followed by D&D of the currently operating GDP once it ceases operation, and then the Comprehensive Site-Wide Operable Unit evaluation. The timing and sequencing for implementation of these actions will be based on a combination of factors including risk, compliance, and technical considerations associated with plant operations as outlined in the FFA.

Previous Citizens Advisory Board (CAB) recommendations have called for DOE to create an overall strategy for disposal of all recyclable metals that will be generated during the cleanup actions at the PGDP in order to maximize reuse/reclamation of the metals. The constant work associated with the cleanup process is sequenced and timed based on factors associated with the FFA process and is not necessarily structured in such a way the characterization and decontamination of recyclable metals can be done in a cost effective manner. Recycling, reclamation, and reuse are widely recognized and practiced methods for achieving waste reduction and cost efficient waste management. Generally, the practice of recycling, reclamation, and reuse requires a commitment of some level of resources, both managerial and physical.

Recommendation:

The Citizen's Advisory Board (CAB) recommends that a greater emphasis be placed on recycling, reclamation, and reuse of materials from the Paducah Gaseous Diffusion Plant. The CAB recommends that DOE:

- 1. Identify an individual/department with specific responsibilities to identify/quantify/maximize the practice of recycling, reclamation, and reuse. This group should coordinate with or be an arm of the existing DOE Pollution Prevention Program. It is not sufficient to provide contractor incentives for recycle/reclamation. A separate entity must be established to place needed emphasis on this important activity.**
- 2. Encourage PACRO (Paducah Area Community Reuse Organization) as the designated community reuse organization to participate in an increased emphasis by providing assistance in identification of market opportunities and the sale of materials to entities external to the PGDP.**
- 3. Provide incentives available to all DOE and contractor employees to identify new or enhanced methods of eliminating waste and to employ waste minimization and pollution prevention awareness techniques in their day-to-day operations. Some companies in the private sector institute "suggestion" programs, whereby employees share in the recognized savings. This offers a powerful incentive to all employees to be on the alert for possible sources of recycle/reclamation.**
- 4. Create a "Lay Down Yard" to store materials for possible later reuse/recycle or until sufficient quantities are available to justify reclamation. Develop solutions with regulators in developing long term storage of recyclables within regulatory guidelines.**
- 5. Use empty or soon to be emptied storage facilities to store materials where contamination from runoff or classification issues might be of concern.**