



Department of Energy

Portsmouth/Paducah Project Office
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OCT 16 2008

Ms. Bobby Lee
Citizens Advisory Board
111 Memorial Drive
Paducah, KY 42001

PPPO-02-658-08

Dear Ms. Lee:

RESPONSE TO CITIZENS ADVISORY BOARD CONSENSUS RECOMMENDATION 08-07 (RECYCLING, RECLAMATION AND REUSE OF MATERIALS AT THE PGDP)

U.S. Department of Energy (DOE) is in receipt of Citizens Advisory Board (CAB) Consensus Recommendation 08-07 related to recycling, reclamation, and reuse of materials at the Paducah Gaseous Diffusion Plant (PGDP). The CAB recommends that a greater emphasis be placed on recycling, reclamation, and reuse of materials at PGDP. The CAB recommends that DOE do the following:

- 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 communities 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.

In response to CAB recommendation # 1, DOE continues to evaluate its current staffing plan to add staff and/or distribute work functions necessary to ensure the success of the overall Environmental Management program. Recycling, reclamation and reuse of materials is one of the functions that is integrated throughout the Environmental Management program at PGDP.

In response to CAB recommendation # 2, DOE is currently working with PACRO and the Purchase Area Development District (PADD) to develop a Memorandum of Agreement for reuse of excess equipment, consistent with DOE policy. It is our intent to further our positive interaction with these entities on future projects related to the site.

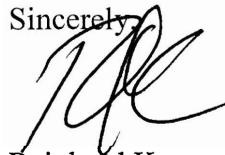
In response to CAB recommendation # 3, DOE has issued direction to the remediation contractor to conduct a comprehensive lifecycle cost and schedule analysis to evaluate for reclamation of potentially recyclable metals. DOE believes there is merit in continuing its analysis of recycling options as we plan for the future decontamination and decommissioning of the PGDP.

DOE's culture is to foster a philosophy of waste minimization as a part of the cleanup mission. We will look at opportunities that exist to provide incentives to employees to identify new or enhanced methods of eliminating waste and to employ waste minimization and pollution prevention techniques in their day-to-day operations.

In response to CAB recommendations # 4 and # 5, DOE is in the process of evaluating the establishment of a "lay down yard" to store materials for possible later reuse or recycling. Specifically, we have given direction to the remediation contractor to provide DOE with a proposal to convert the emptied C-746-A and C-746-B buildings to a safe, covered storage facility by December 30, 2010. If the proposal is accepted and implemented, these facilities could be used for the potential storage of scrap materials for re-use or future recycling consistent with all regulatory standards.

DOE appreciates your continued efforts to provide recommendations that will maximize our waste management efficiencies at the site. If you have any questions or require additional information, please contact Rob Seifert at (270) 441-6823.

Sincerely,



Reinhard Knerr
Paducah Site Lead
Portsmouth/Paducah Project Office

cc:

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