

Metal Recycling Moratorium Continues

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Back in July 2000, Bill Richardson, then Secretary of Energy, issued a moratorium on the unrestricted release for recycling of scrap metals from *Radiological and Radioactive Material Areas*. This step was taken to allay the fears of the public that radioactive materials might find their way into consumer goods. The purpose of this article is to remind everyone of the nature of the moratorium and how we go about complying with it.

Radiological Area

Any location that is posted as a radiation area, high radiation area, contamination area, etc.

Radioactive Material Area

Anywhere in which items or containers of radioactive material exist.

Fermilab has operated an active scrap metal recycling program for many years. The program is beneficial in that it protects the environment by conserving natural resources through the reuse of the metals. It also brings a small amount of revenue into the Laboratory. The program has always implemented rigorous procedures to ensure that radioactive metals do not leave the site for recycling. In recent years, we have even added a commercially built detector that is specifically designed to scan entire truckloads of materials to provide a final check that no radioactive materials are going offsite.

When the moratorium was declared, a relatively swift resolution was anticipated. It has now turned out that such hopes were overoptimistic. DOE continues to prohibit us from releasing metals for commercial recycling if, 1) they originate from an area posted in July 2000 as a Radiological or Radioactive Material Area; or 2) they originate from any post-July 2000 Radiological or Radioactive Material Area. Even if, since July 2000, certain areas have been surveyed and no longer qualify as Radiological or Radioactive Material Areas, we still may not recycle the scrap metal from those areas commercially, regardless of whether both the areas and the materials surveyed proven to not be radioactive.

Although this prohibition seems illogical, it may not be permanent. DOE established the moratorium and its conditions to provide assurance that the public is protected while DOE considers safety issues, hears from the public, and develops its policy for deciding whether certain scrap metals may enter the commercial recycling market. DOE has prepared a Programmatic Environmental Impact Statement under the National Environmental Policy Act (NEPA) process to help identify and decide these issues. In the meantime, the affected scrap metal may be available for beneficial reuse or non-commercial recycling within the DOE system.

Fermilab must determine the eligibility of scrap metal for commercial recycling. To do this, the lab must identify the area of origin for the scrap metal, as described above, and whether or not the metal is radioactive. The extended duration of the moratorium has motivated the development of the status of areas as of July 2000. This effort has just begun. Questions about the status of such areas for the moratorium should be addressed to your Radiation Safety Officer.

Compliance with the moratorium requires Fermilab to segregate and hold, until further notice, all metals that previously would have been collected for commercial scrap/recycling, with the following exceptions:

1. Equipment items that are taken into Radiological Areas and promptly removed (e.g., to perform maintenance or installation tasks).

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2. Large items of equipment excessed from these areas that clearly will be re-used intact rather than melted down and recycled.
 3. Low-level radioactive waste, which will be handled as before, using our established criteria for surveying.
 4. Metals that can be reused here on site in accordance with the provisions of the *Fermilab Radiological Control Manual*.
 5. Metals that can be reused within the DOE complex.
 6. Metals that never occupied a Radiological or Radioactive Material Area and are not radioactive.

As a reminder, the Business Services Section and the ES&H Section have implemented a slightly modified procedure for completing Material Move Requests (MMRs) to complete the necessary documentation.

Personnel who prepare MMRs must now go through the following steps:

Step (1) Check all materials for radioactivity in accordance with the requirements of Articles 411 and 412 of the Fermilab Radiological Control Manual. All materials found to be radioactive by our current release criteria must be disposed of as radioactive waste, as always.

Step (2) If the materials are found not to be radioactive in Step 1, the material must be physically segregated into two groups before the Business Services Section will pick it up:

Group (1): Items that did not originate from a Radiological or Radioactive Material Area as posted in July 2000.

Group (2): Items that did originate from a Radiological or Radioactive Material Area as posted in July 2000.

Questions concerning the status of areas as of July 2000 will be resolved by the responsible division/section Radiation Safety Officer.

Preparation of scrap metal for pickup requires that the scrap be designated as either Group 1 or Group 2 on the MMR. Business Services will continue to recycle the items from Group 1, while Group 2 items must be stored pending further instructions from DOE. Obviously, this program requires a continued effort from all Fermilab employees in order maintain success. At the present time, the storage space needed for Group 2 items continues to grow. Here are some things that everyone can do to help out with this matter:

- Continue to search for Waste Minimization and Pollution Prevention opportunities.
- Remember that Group 2 items are available for reuse here at Fermilab
- Make sure that MMRs are prepared fully, accurately and completely.



This message should be distributed to all employees via delivery of un-addressed copies to Fermilab mail stations. Suggestions for ES&H message topics should be directed to Mary Logue at MS119, grace@fnal.gov or X6329.