Dr. Jane Summerson, DOE
National Nuclear Security Administration
P.O. Box 5400, Building 401
K.AFB
East, Albuquerque, NM 87185

Re: Comment on DOE/NNSA Draft PEA for “recycling” of scrap metals from radiological areas; submitted by email to:
Scrap_PEAComments@hq.doe.gov

Dear Dr. Summerson:

The National Recycling Coalition (Coalition) submits these comments in opposition to the proposed rule that would permit radioactive waste to enter general commerce to be lawful for use in recycled products, or to be permissibly disposed of in Resource Conservation Recovery Act (RCRA) Subtitle D landfills for municipal solid waste (MSW).

Contaminants in the recovered material stream can cause enormous problems. The Coalition has long-standing policies that encourage careful evaluation of the potential impacts of hazardous wastes regulation on recycling programs. Our mission is to assure the maximum benefit to society is achieved in reducing both solid and hazardous wastes. The Coalition also encourages manufacturing processes and products to reduce or eliminate the levels of contaminants that interfere with the recycling process.

This regulation as proposed runs counter to these policies and introduces a whole new set of contaminants that the current recycling system is not designed to manage. We urge you not to jeopardize industries which add hundreds of billion dollars a year to the U.S. economy.

We urge the DOE NOT to proceed with this proposed rule.

Thank you very much for your consideration. If you have any questions about our position, please contact our Policy Chair, Fran McPoland at: (202) 347-9061 or <McPoland@collingswifthynes.com>.

Sincerely,

Mark Lichtenstein, President
National Recycling Coalition
1220 L Street, NW, Suite 100-155
Washington, DC 20005-4018

Please review this electronically. If you must print this, please do so on recycled paper.