

DOCUMENT RESUME

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[Classified Waste Paper Disposal Practices]. LCD-78-104;
B-166506. December 2, 1977. 4 pp.

Report to Rep. John D. Dingell, Chairman, House Committee on
Interstate and Foreign Commerce: Energy and Power Subcommittee;
by Elmer B. Staats, Comptroller General.

Issue Area: Federal Records Management (1400).

Contact: Logistics and Communications Div.

Budget Function: General Government: General Property and
Records Management (804).

Organization Concerned: Department of Defense; General Services
Administration; Central Intelligence Agency.

Congressional Relevance: House Committee on Interstate and
Foreign Commerce: Energy and Power Subcommittee.

Authority: Privacy Act of 1974.

Classified waste disposal requires destroying Government documents to prevent release of their contents. The three primary methods used by the Federal Government to destroy classified documents are incineration, shredding or milling (dry process), and pulping (wet process). Findings/Conclusions: None of these processes involves using chemicals to remove ink although the water used in the pulping process does result in some ink removal. Incineration of the waste results in total destruction and precludes any reuse for recycling. Shredding or milling involves cutting or dry beating and then passing the paper through a security screen. Most of the classified wastes identified to date are destroyed using the wet pulping process. A demonstration project is currently underway at the Pentagon involving the removal of water from the wet pulped wastes, thus permitting sale of the residue. Currently the Government must pay to haul the residue to a landfill. About 3% to 5% of all Federal paper waste is now sold. The National Security Agency transports its classified paper to a recycling firm which destroys documents using a pulping process; the residue is then recycled into paperboard. The Government is reimbursed when the paper market price exceeds a specified amount per ton. There may be some cost to transport the wastes to the contractor and to witness the document destruction. There is no basis for estimating whether the savings would more than offset this cost.
(Author/SW)



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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B-166506

The Honorable John D. Dingell, Chairman
Subcommittee on Energy and Power
Committee on Interstate and Foreign
Commerce
House of Representatives

Dear Mr. Chairman:

Your June 21, 1977, letter asked us to review present regulations of Federal Government agencies with respect to recycling waste paper, with principal attention to agencies disposing of classified documents. You asked whether some agencies' disposal processes involve ink removal, producing toxic chemicals; and whether ink removal is necessary to prevent disclosure of classified information. Finally, you asked us to determine (a) how much Government paper (annual tonnage) is processed in this manner; (b) whether all disposal steps are required; (c) our assessment of economic, social and environmental costs of existing disposal practices; (d) what can be done to make the waste paper usable for other purposes, such as insulation of buildings; (e) after being processed, how is the waste disposed; and (f) whether the paper could be used in other, more socially beneficial ways.

As requested by your Subcommittee, we are providing an interim report on the status of our work to date and the additional work planned to satisfy your request.

To date we have obtained information from officials of Headquarters, Department of Defense, Central Intelligence Agency, National Security Agency, Hill Air Force Base and Wright-Patterson Air Force Base. We have also contacted the General Services Administration (GSA) which is responsible for waste paper disposal at many Federal facilities.

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In the Washington, D.C., area and the other locations visited, classified paper wastes total over 13,000 tons annually. The disposal costs identified to date total about \$142,000 for these wastes. Although some wastes are sold, we have not yet obtained the revenue data.

Classified waste disposal requires destroying the documents to prevent release of their contents. There are three primary methods for destroying classified documents:

- incineration,
- shredding or milling (dry process),
- pulping (wet process).

None of these processes involves using chemicals to remove ink although the water used in the pulping process does result in some ink removal. Incineration of the waste results in total destruction and precludes any reuse for recycling. Only a limited amount of the waste paper at locations visited was processed in this manner. Shredding or milling involves cutting or dry beating the paper which is then passed through a security screen to assure that the residue is small enough to prevent disclosure of the classified information. At the locations we visited the resultant residue from the latter process is not sold, but is hauled to a landfill. The wet pulping process involves soaking and grinding the waste paper. It is then pumped into a screw press forcing the paper through a security screen. The resultant residue is approximately 75 percent water and 25 percent paper residue. The high water content of this residue prohibits baling for shipment to a recycler. Recyclers are not equipped to handle the residue in other than baled form. Consequently, the Government must pay to haul the residue to a landfill. Most of the classified wastes identified to date are destroyed using the wet pulping process.

A demonstration project is currently underway at the Pentagon involving the removal of water from the wet pulped wastes, thus permitting sale of the residue. If this demonstration proves to be cost effective, we believe it may be applied at other wet pulping locations

security requirements for classified waste paper destruction vary among the agencies contacted. The following table summarizes these requirements.

Requirements for Classified
Waste Destruction

<u>Agency</u>	<u>Size of end product must not be greater than</u>	<u>Recycler may destroy if the process is witnessed or certified</u>
CIA	3/16 inch overall	No
DOD	Not specified--mutilation to prevent recognition	No reference
Air Force	1/32 inch wide strips	Yes
GSA	1/4 inch or less strips (maceration and/or pulping acceptable)	Yes
NSA	3/16 inch overall or 3/64 inch by 1/2 inch	Yes

Our work to date showed that GSA regulations on the sale of waste paper to recyclers permits the recyclers to shred or otherwise destroy the document, providing that the recyclers' processes meet security requirements. The destruction must be witnessed by Government employees, or, if cosigned to the mill, a certificate of destruction must be sent to the agency.

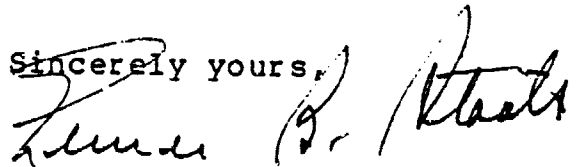
NSA currently transports its classified paper to a recycling firm. The recycler destroys the documents using a pulping process. The residue is then recycled into paperboard. The NSA contract also provides for reimbursing the Government when the paper market price exceeds a specified amount per ton. We believe adopting NSA's approach may permit other agencies to sell classified wastes not now sold and thus could reduce operating costs for Government shredding equipment and the cost of hauling unrecycled residue to a landfill. Also, revenues would be generated from sale of the waste and the waste would have some utility other than landfill. On the other hand, there may be some cost to transport the wastes to the contractor and witness the document destruction. We have no basis, at this time, for estimating whether the savings would more than offset this cost.

We will evaluate alternative disposal methods, including using waste paper as insulation, in the additional work planned to satisfy your request. We will include the disposal of yet

unidentified classified wastes and other privileged paper wastes such as those resulting from the Privacy Act of 1974. GSA officials estimate that about 3 to 5 percent of all Federal paper waste is now sold. Therefore, we also plan to consider other paper waste in our review. Our work will include additional agencies and facilities, and an evaluation of regulations impacting waste paper disposal practices. We will consider the costs and benefits of the disposal alternatives, as well as their conformity with pertinent regulations.

We trust that this interim report will be of help to your Subcommittee. We will gladly further discuss any matters with you or your staff.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Luther B. Kates". The signature is written in a cursive style with a large initial "L".

Comptroller General
of the United States