



1. The Idaho Cleanup Project Citizens Advisory Board (ICP CAB) recognizes the continued use of Idaho's Advanced Mixed Waste Treatment Project (AMWTP) is a matter of urgent importance for the Department of Energy's Office of Environmental Management (DOE-EM). The treatment of Idaho's relevant waste is forecast to be completed this year. Soon after, regulatory requirements for the non-operating facility could impact its future service for treatment of TRU waste now stored at multiple DOE facilities.
2. As the ICP CAB, we have celebrated the successful operation of the AMWTP and recognize the skilled workforce and specialized facilities at AMWTP as a national asset. This specialty workforce, through continuous operational improvements, has safely processed and repackaged 65,000 cubic meters of waste. The current mission of AMWTP when completed could mean that the 300-400 workforce could be lost to DOE through lay-offs.
3. AMWTP features a state-of-the-art "box line" with recently replaced remote handlers (BROKKS) that allow operators to remotely and safely process large volumes of waste. Repackaged waste is then sent to the super compactor where drums are crushed to a four-inch puck significantly reducing the waste volume. Three to four pucks are then placed in an overpack container for shipment. The compaction at the end of treatment has extra significance to complex-wide waste management because of the ongoing need to conserve space at the Waste Isolation Pilot Plant (WIPP).
4. The ICP CAB recently learned that a "business-case" study has been completed that evaluates the benefits and effects of utilizing the AMWTP to process waste from other generator sites across the DOE complex against the costs of constructing similar facilities at those sites. We request that the DOE release the results of this study to the ICP CAB immediately to inform a recommendation of this CAB. The CAB would like to make this recommendation as soon as possible.
5. At its February 21, 2018 meeting, the CAB discussed a number of issues associated with extending AMWTP's mission. Perhaps these issues are addressed in the study. If not and in order to promote informed discussion among the CAB and the interested public, the CAB also requests DOE promptly provide additional information about how these issues will be addressed, should AMWTP be kept open and operating. They include:
  - Requirements of the 1995 Idaho Settlement Agreement
    - Temporary storage of waste (six months in/ six months out) while awaiting shipment to WIPP
    - Priority of Idaho waste shipments to WIPP
    - Non-diversion of Idaho cleanup budget resources
  - Amounts and types of waste that could be processed at AMWTP
  - Packaging requirements for transporting waste from generating sites

- Opportunities for public involvement of potential stakeholders
  - Idaho Attorney General, Idaho Department of Environmental Quality (IDEQ)
  - Hanford CAB members
  - Idaho workers, Union
  - Economic development officials
  - Environmental groups
  - AMWTP employees
  - Local officials – Idaho Falls, Butte, Twin Falls
  - Shoshone-Bannock Tribe
  - WIPP activists
  - Operating Engineers Union
- 6. Considering the imminent completion of AMWTP’s current mission, we stress that time is of the essence. The ICP CAB recommends DOE commit the resources necessary for a vigorous fact-based and open consideration of the ongoing use of this unique and valuable asset. We recognize that inaction is, by default, likely a decision to close AMWTP.
- 7. Recognizing the time urgency, the ICP CAB respectfully requests a prompt reply to our request for the “business-case” study already completed and relevant additional information. Our members are anxious to work with good information as we continue our CAB discussion of this issue of significance to the management of both the Idaho Cleanup Project and waste treatment at additional DOE facilities. Thank you in advance for your efforts.