



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

Draft Hazardous and Polychlorinated Biphenyl Waste Facility Partial-Permit for the Advanced Mixed Waste Treatment Facility

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) reviewed the Draft Hazardous and Polychlorinated Biphenyl Waste Facility Partial-Permit for the Advanced Mixed Waste Treatment Facility (AMWTF). We appreciate the opportunity to review the Draft Permit. Although we reviewed all aspects of the Draft Permit, our comments and recommendations address only the monitoring aspects.

We appreciate the permit requirement for real-time monitoring of all plant emissions to ensure that accurate, up-to-date data is available at all times during facility operation. We understand this will be the first permit to impose such a requirement on a hazardous waste facility in the State of Idaho, and we commend the Division of Environmental Quality for including this provision in the draft permit. Given the relatively high level of public interest regarding potential emissions from the AMWTF, we feel the requirement is justified and appropriate. Knowing that the agency with regulatory authority over the facility will have sound data on which to base its decisions is significant. We have three additional suggestions that we would like to make in this regard.

The INEEL CAB recommends that the permit be revised to include establishment of procedures and protocols that would lead to appropriate actions in the event that real-time stack and ambient monitoring data indicate permitted emissions have been exceeded. Further, these procedures and protocols should be made part of the public record. We understand that actually shutting down an incinerator would be both difficult and time-consuming. We nonetheless feel that prior specification of a systematic procedure and designation of a specific role for the State of Idaho as the regulator in a rational decision-making process would allow the real-time monitoring data to translate into operational oversight of the facility operations. In addition, having such procedures and protocols in place would help the public to feel more comfortable that human health and the environment will be protected by the agency with regulatory authority, under all circumstances.

We understand that the real-time monitoring data will be provided by the facility to the State of Idaho electronically. **The INEEL CAB recommends that the real-time monitoring data be made available to the public at the monitoring station located along the Greenbelt in Idaho Falls and other similar locations. Additionally the CAB recommends that the state consider other methods for allowing public access to the data, including via an Internet homepage.** Obviously, the data would have to be formatted in such a way that the public could readily understand what is being portrayed and how it compares to what had been predicted and what is allowed under the final permit. Making the data available to the public would be a good

way to increase public confidence regarding the facility at little additional cost to the facility operators or the regulator.

The INEEL CAB further recommends that sufficient monitoring sites be established to ensure that all potentially affected individuals can track monitoring data and determine if actual emissions are within permitted limits. These monitoring sites should be located throughout the affected region (both upwind and downwind of the INEEL) to ensure that facility emissions are monitored under all likely weather conditions and in the direction of population centers located in the vicinity of the facility. All monitoring sites should be operational before the incinerator becomes operational in order to establish scientifically valid baseline readings against which subsequent readings can be compared. The State should consider joint financial arrangements for construction and operations of any new monitoring sites, as appropriate.