



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 24, 2013

13-NWP-068

Mr. Kevin Smith, Manager  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Re: Independent Cooling Module (ICM) Condensate

References: USDOE Letter 13-ECD-0018, "U.S. Department of Energy, Office of River Protection (ORP) Requests Review and Approval of Submittal of Criteria and Toxic Air Emissions Notice of Construction (NOC) Modification for AY/AZ Tank Farm Ventilation Upgrade," dated April 08, 2013

Dear Mr. Smith:

The United States Department of Energy - Office of River Protection's Notice of Construction (NOC) application requests an upgrade to the current ventilation system for the AY/AZ Tank Farm. Among the upgrades will be the installation of a portable closed loop Independent Cooling Module (ICM). The ICM "will take warm tank headspace air and cool it and return it to the tank *along with condensate* collected in the condenser." (Emphasis added.)

The NOC submitted is a request to modify an air emission, Approval Order DE11NWP-001. The inclusion of condensation and creation of a condensate that will result from the operation of the ICM may lead to regulation under the State's Hazardous Waste Management Act of 1976, as amended (Revised Code of Washington 70.105A).

When the Department of Ecology issues a modification to ORDER DE11NWP-001, the construction of the ICM may commence per the State's Clean Air Act. However, before commencing operation of the ICM, you must address management of the condensate. Please tell us whether the condensate designates as a dangerous waste under Washington Administrative Code 173-303 – Washington Dangerous Waste Regulations. In addition, please inform us no later than August 15, 2013, if you will modify other permits to address this activity.



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If you have any questions regarding this letter, please contact Philip Gent at [Philip.gent@ecy.wa.gov](mailto:Philip.gent@ecy.wa.gov) or 509-372-7983 or Kristi Wold at [Kristi.wold@ecy.wa.gov](mailto:Kristi.wold@ecy.wa.gov) or 509-372-7985.

Sincerely,



Jane A. Hedges  
Program Manager  
Nuclear Waste Program

pg/jvs

cc:

Nancy Helm, EPA Region 10  
Laurie Kral, EPA Region 10  
Dennis Bowser, USDOE  
Lori Huffman, USDOE  
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cc:

Administrative Record  
Correspondence Control, USDOE-ORP  
Environmental Portal