



ADVISORY

NOTICE OF RULE ADOPTION RULE 1202 - HEXAVALENT CHROMIUM - COOLING TOWERS (New Rule)

On May 28, 1991, the Air Pollution Control Board adopted Rule 1202 - Cooling Towers. This regulation bans the use of hexavalent chromium as a water treatment additive for cooling towers and requires owners or operators of cooling towers to submit a report to this District. Additionally, at least one test of the cooling tower water will be required.

The definition of cooling tower includes, but is not limited to, evaporative condensers, quench towers and cooling towers used in heating, ventilation, cooling or air conditioning processes. Any facility operating a cooling tower is subject to the rule, regardless of the nature of the operation or size of the cooling tower. Air Pollution Control District permits will not be required for affected cooling towers.

Rule 1202 prohibits the use of Cr(VI) compounds in any cooling tower operated in San Diego County. Existing cooling towers will be required to meet a Cr(VI) content limit of 0.15 milligrams per liter of circulating water within six months of rule adoption. Wooden cooling towers will be required to meet this limit within twelve months. New cooling towers will be immediately subject to the rule requirements.

Within three months of adoption of the rule, operators of cooling towers must notify the District regarding operation of the cooling tower and how compliance will be achieved. Within six months of adoption of the rule, operators must discontinue use of materials containing Cr(VI) in the cooling tower and test the cooling tower circulating water. The results of all required tests as well as records of additives used in cooling towers will be required to be maintained for at least two years. Facilities which have never used materials containing Cr(VI) or have stopped using Cr(VI) at least one year before May 28, 1991 will only be required to perform one test per cooling tower. All other facilities will be required to perform at least two tests per cooling tower. Enclosed is a copy of the form which should be used to report your tower to this District and to indicate how you intend to comply with this rule. Also attached is a listing of local laboratories which have indicated to the District that they can provide testing services as specified in Method 312B.

Concurrent changes to District Rule 40 were also adopted which allow the District to collect a one-time-only fee from cooling tower operators in order to cover the District's costs to implement and enforce Rule 1202 requirements. The charge for affected facilities is \$35 for submission of the plan plus \$20 for each cooling tower described in the plan. Future charges to cover District expenses for cooling tower water sampling and analysis would also be allowed.

The California Air Resources Board (ARB) conducted a study on chromate substitutes. Based on information received from water treatment professionals and cooling tower operators, ARB expects phosphates, phosphonates, zincs, molybdenum, azoles and polyacrylamides to be most frequently used as non-chromate substitutes. Formulations containing those chemicals are

generally considered to be the most effective non-chromate cooling tower water treatment systems. None of these substitutes are currently listed on either of the Governor's Proposition 65 list or the ARB priority list for toxic air contaminant identification evaluation. The manufacturer of your cooling tower should be consulted regarding non-chromate substitutes. Enclosed with this advisory is a list of possible alternatives to chromate.

If you would like a copy of Rule 1202 and changes to Rule 40, please call Juanita Ogata at (619) 694-3307. If you have any questions concerning this Advisory, contact the District's Enforcement Division at (619) 694-3340.

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