

INDUSTRIAL PROCESS COOLING TOWERS

MACT COMPLIANCE CHECKLIST

BACKGROUND

The Industrial Process Cooling Tower (IPCT) MACT standard is relatively simple. It prohibits the use of chromium-based water treatment chemicals in cooling towers, used for industrial processes, at affected sources. Cooling towers used for heating, ventilation, and air conditioning (HVAC) **only**, are not covered by this standard. Chrome emissions from HVAC systems are covered under section 6 of the Toxic Substances Control Act.

For the purposes of this standard, an affected source is an Industrial Source Cooling Tower (Tower) in which chromium-based water treatment chemicals were in use on September 8, 1994 and which are major sources or are integral parts of major sources (See definition of major source below). If the water being cooled by the Tower is used for an industrial process, the Tower is considered an integral part of the major source and is regulated.

Due to the nature of cooling towers, it is difficult to identify them as sources through normal methods (e.g. SIC Codes, Industrial Associations, etc.). To date, there has only been one (1) source that has submitted an initial notification. This source has certified that they do not use chromium treatment chemicals. Due to the difficulty of identifying subject sources, it is important that the Compliance personnel be aware of this standard when conducting inspections at major sources.

COMPLIANCE QUESTIONS

1. Do you have a cooling tower that is used to cool industrial processes (See definition of IPCT below)?
If no, stop here.
2. Did you use chromium-based water treatment chemicals in your cooling tower(s) on, or after, September 8, 1994?
3. Do you use chromium-based water treatment chemicals in your cooling tower(s)?

If the answers to questions two (2) and three (3), above, were no, there are no requirements for this facility.

If the answer to question two (2) or three (3) was yes, inform the representative that the use of chromium-based water treatment chemicals, at major sources, was prohibited effective September 8, 1994 for new sources (those built after August 12, 1993) and March 8, 1996 for existing sources (those built before August 12, 1993).

If the answer to question two (2) or three (3), above, was yes, continue with the questionnaire.

4. Did you submit an "Initial Notification Report" form to EPA Region 7 in Kansas City or NDEQ?
If yes, when? (Was due September 8, 1995)
If no, inform them that they must do so immediately (Copy attached).

5. Have you submitted your "Notification of Compliance Status" report to EPA Region 7 or NDEQ?

If yes, when? (Was due March 8, 1996)

If no, inform them to do so immediately (Copy attached).

6. Are you still using chromium-based water treatment chemicals in your IPCT?

If yes, stop immediately.

If yes, submit the "Initial Notification Report" form and the "Notification of Compliance Status" report to EPA Region 7 and NDEQ immediately.

- IPCT (Industrial process cooling tower), means any cooling tower that is used to remove heat that is produced as an input or output of a chemical or industrial process(es), as well as any cooling tower that cools industrial processes in combination with any heating, ventilation, or air conditioning system.
- Major source means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

For additional information contact:

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