

**Air Pollution Control Board**

Greg Cox	District 1
Dianne Jacob	District 2
Pam Slater	District 3
Ron Roberts	District 4
Bill Horn	District 5

Air Pollution Control Officer

R. J. Sommerville

COMPLIANCE ADVISORY

NOTICE OF AMENDMENTS TO RULE 10 PERMITS REQUIRED

On July 25, 1995, the Air Pollution Control Board adopted amendments to existing District Rule 10 which specifies the conditions for which District permits are required. The amendments were based on recommendations of the County of San Diego Economic Advisory Board's Sunset Commission. In addition, the District initiated changes and incorporated them into the amended rule.

These amendments will accomplish the following:

Permit Posted	Requires a <u>current</u> Permit to Operate be posted or maintained readily available at all times on the operating premise.
Inactive Status	Deletes the requirement that equipment not be operated for at least one year before an inactive status permit can be issued.
Ownership Transfer	Allows an application to transfer ownership of a Permit to Operate to be used as a temporary Permit to Operate until the District can act on the application.
Other	Makes other minor changes and deletes unnecessary language.

Copies of amended Rule 10 can be obtained by calling (619) 694-3307. For more information, please call the District's Compliance Division at (619) 694-3340.

GMH:jo
8/21/95

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NOTICE OF AMENDMENTS TO RULE 66 ORGANIC SOLVENTS

On July 25, 1995, the Air Pollution Control Board adopted amendments to existing District Rule 66 which specifies requirements for operations using organic solvents not covered by other industry-specific rules. The amendments were based on recommendations of the County of San Diego Economic Advisory Board's Sunset Commission. In addition, the District initiated changes to delete outdated requirements and update test methods for determining compliance.

These amendments will accomplish the following:

**Outdated
Requirements
Deleted**

Deletes the requirement that a person not use an organic solvent exceeding the photochemical reactivity compositional limits of Rule 66 to thin or reduce any surface coating prior to its application.

Deletes the requirement to consider emissions from the disposal of organic solvents as part of the cumulative total when determining compliance with the discharge limits specified in the rule.

Exemption Added

Adds an exemption from the provisions of Rule 66 for any equipment, process or operation that has installed Best Available Control Technology or Lowest Achievable Emission Rate control technology pursuant to the New Source Review rules.

**Test Methods
Updated**

Updates test methods for determining compliance and makes other minor corrections and clarifications to improve the rule.

Copies of amended Rule 66 can be obtained by calling (619) 694-3307. For more information, please call the District's Compliance Division at (619) 694-3340.

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NOTICE OF AMENDMENTS TO RULE 97 – EMERGENCY VARIANCES AND RULE 98 – BREAKDOWN CONDITIONS: EMERGENCY VARIANCES

On July 25, 1995, the Air Pollution Control Board adopted amendments to existing District Rules 97 and 98 concerning emergency variances. Rule 97 specifies the findings that must be made before an emergency variance can be issued. Rule 98 specifies criteria under which the District can elect to take no enforcement action for a violation of a rule as a result of a short-term equipment breakdown, provided the business follows the requirements specified in the rule.

The amendments were based on recommendations of the County of San Diego Economic Advisory Board's Sunset Commission. In addition, the District also made minor corrections and clarifications.

These amendments will accomplish the following:

Show Good Cause Deletes the requirement that findings contained in the Health and Safety Code Sections 42352 and 42353 be made before an emergency variance can be issued and instead require good cause be shown.

Time Increased Increases the time to call in a breakdown condition from one hour to two hours after the breakdown condition is detected.

Increases the time to submit a written report from one week to fifteen (15) calendar days after the breakdown is corrected.

Other Makes other minor changes and clarifications to improve the rule.

Copies of amended Rules 97 and 98 can be obtained by calling (619) 694-3307. For more information, please call the District's Compliance Division at (619) 694-3340.

GMH:jo
8/21/95

9150 Chesapeake Drive • San Diego • California 92123-1096 • (619) 694-3307
FAX (619) 694-2730 • Smoking Vehicle Hotline 1-800-28-SMOKE

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NOTICE OF AMENDMENTS TO RULE 1202 HEXAVALENT CHROMIUM – COOLING TOWERS

On July 25, 1995, the Air Pollution Control Board adopted amendments to existing District Rule 1202 which controls hexavalent chromium emissions from cooling towers. Rule 1202 implements a statewide Air Toxic Control Measure adopted by the state Air Resources Board. Hexavalent chromium is a toxic air contaminant.

The amendments were based on recommendations of the County of San Diego Economic Advisory Board's Sunset Commission. In addition, the District initiated changes in response to a public comment to revise the rule concerning existing wooden cooling towers and incorporated those changes into this rule.

These amendments will accomplish the following:

**Certification
by Owner**

Allows the owner of a new cooling tower to certify by written statement that chromate additives have never been used in the cooling tower in lieu of testing the circulating water to determine chromium concentration.

Exemption

Exempts wooden cooling towers from additional testing if two consecutive monthly tests show a hexavalent chromium concentration of less than 0.15 milligrams per liter of circulating water.

**Start-up
Notification**

Reduces the time period from 90 days to 15 days for notifying the District in writing prior to starting-up a new cooling tower.

Copies of amended Rule 1202 can be obtained by calling (619) 694-3307. For more information, please call the District's Compliance Division at (619) 694-3340.

GMH:jo
8/21/95

**SAN DIEGO AIR POLLUTION CONTROL DISTRICT
DIVISION OF SURVEILLANCE AND ENFORCEMENT
9150 CHESAPEAKE DRIVE
SAN DIEGO, CA 92123
(619) 694-3340**

**RULE 1202 - COOLING TOWERS
REQUIRED INFORMATION REPORTING FORM**

1. **DBA:** _____

2. **Facility Address:** _____

3. **Facility Contact Information:**
Name: _____
Address: _____
Phone: _____

4. **Cooling Tower Equipment Locations**
at Facility: _____
(i.e, on roof of building #15, 5th floor, etc)
cooling tower #2 _____
cooling tower #3 _____

5. **Wooden Components Equipment Description**
Are any of the cooling towers equipped with wooden components? yes; no.
Describe components and identify tower(s) using the designations above:

6. **Which, if any, of the above cooling towers use hexavalent chromium- containing compounds?** _____

7. **How will compliance with Rule 1202 be achieved?** _____

Name of Preparer: _____ **Date:** _____

RULE 1202 HEXAVALENT CHROMIUM - COOLING TOWERS

CHROMATE SUBSTITUTES*

The California Air Resources Board (ARB) has investigated substitutes for chromates used in cooling towers. They list the following as possible alternatives. Since many of these substitutes are recommended for specific types of cooling towers (steel-based, copper-based, etc), the manufacturer of your cooling tower should be consulted for their recommendations. None of the substitutes are currently listed on either the Governor's Proposition 65 list or the ARB priority list for toxic air contaminant identification evaluation. Direct discharges of many of these chemicals are regulated by water control agencies.

Corrosion Inhibitors:

azoles	molybdates	polyamines
borates	nitrites	polyphosphonates
carboxylate	phosphates	silicates
ferrocyanide	phosphoramides	zinc

Anti-Scalants and Dispersants:

phosphates	polymers
phosphonates	lignins and tannins

The potential effects of a chromate substitute should be considered, along with other tower variables, when designing a treatment program. Potential effects from cooling tower drift include the environmental impact of substitute chemicals. Careful selection of a chromate substitute minimizes potential environmental impacts from these releases.

* This is a list of chromate substitutes which are currently known to this District. This is not an endorsement of any substitute listed herein. Other substitutes may be available through your cooling tower manufacturer or chemical supplier.