

Questions and Answers for Process Contact Cooling Towers

Who is subject to the Process Contact Cooling Tower Requirements?	6 - 1
If I'm a new affected source what do I need to do?	6 - 1
If I'm an existing affected source, what do I need to do?	6 - 1
How do I know if I'm in compliance?	6 - 1
What parameters do I need to record during each sample?	6 - 2
What else do I need to report?	6 - 2

Requirements for Process Contact Cooling Towers are located in 63.1329

Who is subject to the Process Contact Cooling Tower Requirements?

Manufactures of PET that are considered new affected sources.

Manufactures of PET using a continuous terephthalic acid high viscosity multiple end finisher process contact cooling tower that are considered existing affected sources.

If I'm a new affected source, what do I need to do? [63.1329(b)]

You cannot send contact condenser effluent associated with a vacuum system to a process contact cooling tower, and in the Notification of Compliance Status, state that you are not sending this effluent to a vacuum system.

If I'm an existing affected source, what do I need to do? [63.1329(c)]

If you are subject to or become subject to 40 C.F.R. Part 60 Subpart DDD, you should maintain an ethylene glycol concentration in the process contact cooling tower at or below 4.0 wt% averaged on a daily basis over a rolling 14 day period.

How do I know if I'm in compliance? [63.1329(c)(1 thru 4)]

Collect at least one sample per operating day using the methods in 40 C.F.R. 60.564 (j)(i). Calculated an average daily basis over a rolling 14-day period. This sampling program can be reduced to any 14 consecutive operating day period once every two calendar months if at least 17 consecutive 14 day rolling averages are each less than 1.2 wt% ethylene glycol. However the owner will resume daily sampling if the rolling average during the reduced monitoring period exceeds the upper 95% confidence interval (See equation 27 in 63.1329)

OR

Measure an alternative parameter (e.g. carbon oxygen demand) that is demonstrated to be directly proportional to the ethylene glycol. This parameter should be measured during the initial 14-day period performance test (sampling ethylene glycol each day) during which the facility is shown to be in compliance with the 4 wt% standard. Then the alternative parameter shall be measured on a daily basis and the average value of the alternative parameter shall be calculated on a 14 day rolling period.

What parameters do I need to record during each sample? [63.1329(c)(3)]

Each sample is considered a performance test, so the daily measurement and daily average 14-day rolling average should be recorded. For the first 14-day monitoring period. These records should be submitted in the Notification of Compliance Status Report.

What else do I need to report? [63.1329(c)(3) & (4)]

Provide the initial monitoring records in the Notification of Compliance Status Report.

Provide all periods when the 14-day rolling average exceeds 4 wt% in the Periodic Report.