



## Small Business & Local Government Assistance Surface Coaters Compliance Checklist

This checklist is for guidance purposes only. It is not a substitute for the rules and regulations. The Small Business & Local Government Assistance (SBLGA) Program is an independent section, separate from enforcement of the Texas Commission on Environmental Quality (TCEQ). Contact SBLGA on its toll-free hotline 800-447-2827 or on the SBLGA Web site <www.texasenvirohelp.org>.

**Company Information** \_\_\_ 1<sup>st</sup> visit \_\_\_ 2<sup>nd</sup> visit \_\_\_ C2 Renewal Site Visit Date:

Company Name		Facility Contact	
Mailing Address		Physical Address County	
Owner's Name		Business Phone	
Date of Construction		Primary SIC	
Start of Operation		Secondary SIC	
Latitude		Longitude	

**IMPORTANT NOTES:**

- Compliance-related questions are denoted with an asterisk (\*). Answering "no" to a question with an asterisk may mean the facility is out of compliance with state or federal environmental rules.

- Have there been any process changes since the last site visit? \* YES/NO

\*If yes, explain the changes and include the date of changes in the comments.

**Air Regulations – Authorizations can be obtained in one of three ways:**

- De Minimis Status
- Permit by Rule (PBR)
- New Source Review (NSR) Permit

		Yes	No	N/A
1	Does this facility claim De Minimis status?			
2*	<i>In order to claim de minimis, you must answer yes to either (a) <b>and</b> (b), or (c).</i>			
	a.* Does the facility meet the material useage limits found in 30 TAC §116.119(a)(2)?			
	b.* Does the facility maintain records demonstrating compliance with the useage limits in 30 TAC §116.119(a)(2)?			
	c. Or, are sources at the facility claimed as de minimis included on the "De Minimis Facilities and Sources" list? <a href="http://www.tceq.state.tx.us/permitting/air/guidance/newsourcereview/list-of-de-minimis-facilities.html">http://www.tceq.state.tx.us/permitting/air/guidance/newsourcereview/list-of-de-minimis-facilities.html</a>			
3	Does this facility have an RN/CN number? If yes, RN _____ CN _____			

4	Does this facility have an air account number? If yes, Account No. _____			
5*	Does this facility have an air permit? If yes, Permit No. _____			
6*	If yes: Does the facility comply with all permit conditions? (Use comments section)			
7*	Does the facility claim a Permit by Rule (PBR)?			
8*	If yes, Does the facility meet all requirements of the PBR(s) claimed? See Below			
	a.* 106.227 – Soldering, Brazing, Welding			
	b.* 106.265 – Handheld and Manually Operated Machines			
	c.* 106.372- Industrial Gases			
	d.* 106.412 Fuel Dispensing			
	e.* 106.432 – Dipping Tanks and Containers			
	f.* 106.433 – Surface Coating Facility (if yes, questions 16-39 will apply)			
	g.* 106.434 – Powder Coating Facility			
	h.* 106.451 – Wet Blast Cleaning			
	i.* 106.452 – Dry Abrasive Blasting (if yes, questions 40-47 will apply)			
	j.* 106.454 – Degreasing Units			
	k.* 106.472 – Organic and Inorganic Liquid Loading and Unloading			
	l.* 106.473 – Organic Liquid Loading and Unloading			
	m.* Other/Previous PBR: _____			
	n.* Other/Previous PBR: _____			
	o.* Other/Previous PBR: _____			
9*	Does the facility maintain records that demonstrate compliance as required by 30 TAC 106.8 for all PBRs?			
10	Is the facility a major source?			
11*	If yes, does the facility have a federal operating permit?			

12*	Does the facility comply with any applicable 30 TAC 111 requirements? (Control of Air Pollutants from Visible Emissions and Particulate Matter)			
13*	Does the facility avoid being a nuisance (noise, dust, odor, etc)?			
<b>Facilities Claiming PBR 106.433 – Surface Coating Operations</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
14	Are spills cleaned up immediately?			
15*	Are booths or work area exhaust fans operating when cleaning spray guns and equipment?			
16*	Are coatings and solvents stored in closed containers?			
17*	Are all emissions from coating and cleanup solvents at the site less than 25 tons per year VOC and 10 tons per year exempt solvents?			
18*	Are all emissions from coating and cleanup solvents at the site less than 30 lbs/hr VOC and 5 lbs/hr exempt solvents?			
19	Are emissions less than 0.25lbs/hr of VOCs and/or exempt solvents?			
20*	Is the opacity of visible emissions less than 5%?			
21*	* Does the facility use drying ovens that are electric or have a maximum heat input of 40 MMBtu/hr?			
	a.* Is the fuel: sweet natural gas, liquid petroleum gas, fuel gas containing no more than 5.0 grains of total sulfur compounds per 100 dry cubic foot, or number 2 fuel oil with no more than 0.3% sulfur by weight?			
22*	Are MSDSs for all coatings and solvents kept on-site?			
23*	Does the facility have records of daily coating and solvent use and the actual hours of operation of each coating or stripping operation?			
24*	Does the facility have a monthly report that shows emissions from each operation in: lbs/hr, lbs/day, lbs/week <b>and</b> tons of VOC emitted from the site in the previous 12 months?			
25*	Has the facility registered with the TCEQ using form PI-7 or PI-7-CERT?			

26	Is your surface coating operation performed in an enclosed work area or booth? (If no, questions 27 through 31 will not apply.)			
27*	Is the emission rate no greater than 6lbs/hr (averaged over a 5 hour period), and 500 lbs/wk per booth/enclosed work area?			
28*	Is the minimum face velocity at the intake opening at least 100 ft/min and are emissions exhausted through elevated stacks at least 1.5 times the building height above ground level?			
29*	For spray operations, are particulate emissions controlled by either a wash water system or dry filter system with removal efficiency of at least 95%?			
30*	Is the face velocity at the filter not exceeding 250 ft/min or that specified by the manufacturer?			
31*	Is the stack rain protection not obstructing vertical discharge of emissions?			
32	Is your surface coating operation performed outdoors or in a non-enclosed work area? (If no, questions 33 through 37 will not apply.)			
33*	Is the emission rate no greater than 6 lbs/hr (averaged over a 5 hour period), and 500 lbs/wk for all operations?			
34*	Are coatings applied with spray equipment?			
35*	If coatings are applied with spray equipment and they contain more than 0.1% by weight of any of the heavy metals (cobalt, strontium, selenium, cadmium, lead, chromate) are total VOC emissions less than 240 lbs/wk and 2,000 lbs/yr?			
36*	Are coating operations conducted at least 50 ft. from the nearest property line and at least 250 ft. from any recreational area, residence, or other structure not occupied or used solely by the owner or operator of the facility or the owner of the property upon which the facility is located?			
37*	Has written approval from TCEQ or any local program with jurisdiction been received?			

<b>Facilities claiming PBR 106.452 – Dry Abrasive Cleaning</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
38	Is the facility conducting <u>enclosed abrasive blasting</u> ? (If no, questions 39 and 40 do not apply.)			
39*	Are particulate matter emissions evacuated through a fabric filter with a maximum filtering velocity (air/cloth ratio) of 4 ft/min with mechanical cleaning or evacuated through a fabric filter with a maximum filtering velocity of 7 ft/min with air jet pulse cleaning?			
40*	Does the facility prevent fugitive emissions from leaving the property?			
41	Is the facility conducting <u>outside blast cleaning</u> ? (If no, questions 42 through 45 do not apply.)			
42*	Is the abrasive usage rate less than 150 tons per year, 15 tons per month and 1 ton per day?			
43*	Are records of operating hours and abrasive material usage maintained?			
44*	Is blast cleaning performed at least 500 ft. away from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located?			
45*	Has the facility registered with the TCEQ using form PI-7 or PI-7-CERT?			
<b>Air Regulations (Chapter 101) – Emission, Maintenance, Start-up, Shutdown</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
46*	Does the facility track all reportable and non-reportable emission events and report them to TCEQ by March. 31 of each year?(101.201)			
47*	Does the facility track all reportable and non-reportable scheduled maintenance, start-up, and shut-down activities and report them to TCEQ by March 31 of each year? (101.211)			
48	Is the facility required to submit an annual emissions inventory as specified in 30 TAC 101.10?			
49*	Are all records maintained for a minimum of 5 years?			
<b>Air Regulations (Federal Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>

50*	Does the facility comply with any applicable 30 TAC 113 requirements? (Standards of Performance for HAPs)			
<b>Surface Coating of Miscellaneous Metal Parts and Products (MMPP)</b>				
51	Does the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (Major Sources, MMMM) apply to this facility? <a href="http://www.tceq.state.tx.us/assistance/sblga/air/neshap/4M.html">http://www.tceq.state.tx.us/assistance/sblga/air/neshap/4M.html</a>			
52*	a. Is the facility a major source of HAPs?			
	b.* Did the facility certify HAP emissions below 10 tons per year (tpy) of any single HAP or 25 tpy of combined HAPs by January 2, 2007?			
	c. *Does the facility meet required emission limits?			
	d. *Does the facility follow required work practice standards?			
	e. *Does the facility follow the operating limits?			
	f. *Does the facility keep records to document compliance for 5 years?			
	g. *Does the facility follow all notification and reporting requirements?			
<b>Miscellaneous Surface Coating Operations</b>				
53	Is the facility subject to 40 CFR Part 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources? <a href="http://www.tceq.state.tx.us/assistance/sblga/air/neshap/neshap6h.html">http://www.tceq.state.tx.us/assistance/sblga/air/neshap/neshap6h.html</a>			
54*	If yes:			
	a. *Has the owner or operator submitted the "Initial Notification and Compliance Certification" (Form TCEQ-20454 for existing sources, TCEQ-20453 for new sources) or equivalent?			
	b. *Is the facility in compliance with the requirements of 40 CFR Part 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources?			
	c. *Has the facility kept adequate records to demonstrate compliance?			

	d. *If anything has changed from the notice given in the "Initial Notification and Compliance Certification" form, has the facility also submitted the required "Annual Notification of Changes Report"?			
<b>Air Regulations (Federal Requirements, 40 CFR 63 Subchapter T)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>Solvent Cleaning and Degreasing Operations</b>				
55	Does the facility use any of the following solvents in a cleaning machine with a volume greater than 2 gallons or uses a solvent that contains 5% or more by weight of any one or any combination of the following solvents? If no, NESHAP doesn't apply.			
	a. Trichloroethylene			
	b. 1,1,1 Trichloroethane			
	c. Perchloroethylene			
	d. Methylene chloride			
	e. Chloroform			
	f. Carbon tetrachloride			
	If the answer to Question 57 is yes, then 40 CFR Chapter 63 Subpart T: National Emission Standards for Halogenated Solvent Cleaning applies.			
56*	<b>For batch vapor and in-line cleaning machines:</b>			
	a.* Does the facility meet the overall emission limit or the equipment standard for each machine?			
	b.* If the equipment standard is used, does the facility also meet basic design, work practice, and operator text requirements?			
	<b>For batch cold cleaning machines:</b>			
	a.* Does the facility comply with equipment control and work practice requirements for each machine?			
57	Does the facility service vehicle air conditioners?			
58*	If yes, are the technician(s) approved/certified by EPA?			
59*	If yes, is equipment approved/certified by EPA?			

60*	If yes, is recovered refrigerant sent to an EPA approved reclaiming facility OR is the facility an EPA approved reclaiming facility? <a href="http://www.epa.gov/ozone/title6/608/reclamation/reclist.html">http://www.epa.gov/ozone/title6/608/reclamation/reclist.html</a>			
61*	Has the facility submitted a certification of acquisition of recovery of recycle equipment?			
<b>Petroleum Storage Tanks (PST) Regulations</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
62*	a.* Are all regulated USTs and ASTs registered with the TCEQ?			
	b.* Are all active USTs containing motor fuel self-certified?			
	c.* Is a TCEQ delivery certificate posted at the facility?			
63*	Are the appropriate records being maintained for the recordkeeping requirements of 30 TAC 334.10?			
64*	Have all motor fuel USTs been properly labeled?			
65*	Are records properly kept if the facility is involved in retail sales and required to keep Inventory Control records?			
66*	Do all USTs meet TCEQ requirements for corrosion protection, spill and overfill prevention, leak detection, financial assurance, etc.?			
67*	Do any of the following conditions exist regarding storage tanks?			
	a. Total aboveground capacity of the facility is greater than 1,320 gallons?			
	b. Total capacity in underground tanks, that do not meet UST standards of either 40 CFR 280 or 281, is greater than 42,000 gallons?			
	If yes, does the facility have a Spill Prevention Control & Countermeasure (SPCC) Plan?			
68*	Does the facility have an exemption for Stage II or meet Stage I and Stage II requirements if necessary?			
69*	Does the facility have documentation to support an exemption from or compliance with Stage I and Stage II requirements?			

<b>Waste Regulations (General Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>	
70*	Has the facility performed a hazardous waste determination on all solid waste streams?				
71*	Does the facility maintain documentation to support all hazardous waste determinations?				
72*	Has the facility reconciled their manifests with their records of generation to verify the amounts of waste transported off-site and disposed of? (335.9, 335.69)				
73*	Does the facility have records of monthly waste generation to support its claimed generator status? Indicate the generator status claimed.				
<b>Generator Status</b>		<b>Hazardous Waste/Month</b>	<b>Acute Waste<sup>1</sup></b>	<b>Amount<sup>2</sup></b>	<b>Storage Time</b>
Y/N					
	CESQG	Up to 220 lbs.	Up to 2.2 lbs.	Up to 2,200 lbs.	No time limit
	SQG	220-2200 lbs.	Up to 2.2 lbs.	Up to 13,200 lbs.	180 days <sup>3</sup>
	LQG	Over 2200 lbs.	Over 2.2 lbs.	Any amount	90 days
<sup>1</sup> Pounds of acute hazardous waste generated per month <sup>2</sup> Accumulation of hazardous waste per month <sup>3</sup> The limit is 270 days if the treatment, storage, and disposal facility is more than 200 miles away					
74*	Is this facility registered with the TCEQ as a hazardous waste generator? (not required for CESQG) TCEQ Registration No. _____ EPA ID _____				
75	Is the facility an industrial waste generator?				
76*	If yes, is all non-hazardous waste classified as Class 1, Class 2, and Class 3?				
77*	If this facility generates greater than 220 lbs of Class 1 waste are they registered with the TCEQ? (Only required if not already registered as a SQG or LQG)				
78*	Is the facility's Notice of Registration (NOR) up to date, including all waste streams and waste management units? (Not required for CESQG)				
79*	Has the facility submitted an Annual Waste Summary each year? (Not required for CESQG)				

80*	Does the facility fulfill all other recordkeeping and reporting requirements for its generator status?			
<b>Waste Regulations (On-Site Accumulations Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
81*	Does the facility comply with appropriate accumulation time requirements?			
82*	Does the facility comply with appropriate accumulation quantity requirements?			
83	Is hazardous waste accumulated in tanks at the facility?			
84*	a. * Has the tank system's integrity been assessed and certified by an independent, qualified, registered professional engineer? (Applies to LQG only)			
	b. * Are tanks labeled with the words "hazardous waste"?			
	c. * Are records kept of daily tank inspections?			
	d. * Do tanks have a secondary containment system designed to contain 100% of the largest tank within its boundaries? (Applies to LQG only – 40 CFR 265.193(e))			
	e. * If yes, is the secondary containment either designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system or have sufficient excess capacity to contain run-on or infiltration of precipitation from a 25 year 24 hour rainfall event? (Applies to LQG only – 40 CFR 265.193(e))			
85	Is hazardous waste accumulated in container storage areas at the facility?			
86*	If yes, are waste containers labeled, dated, closed, and compatible with their contents? (Required for LQG and SQG only, although CESQG may want to adhere to also)			
87*	<b>If the facility is a SQG or LQG:</b>			
	a. * Does the facility conduct weekly container inspections?			
	b. * Does the facility document weekly container inspections?			
	c. * Have employees been trained in the handling of hazardous waste, with regards to their job duties?			
	d. * Has an emergency response coordinator and alternative been designated, available 24 hours a day to respond to on-site spills and accidents?			

	e. * Have emergency numbers been posted by the telephone at the facility?			
88	Is hazardous waste accumulated in satellite accumulation areas at the facility?			
89*	If yes: (required for SQG and LQG)			
	a. * Are waste containers labeled, closed and compatible with their contents?			
	b. * Is the amount of accumulated waste at each satellite accumulation point less than 55 gallons (or 1 quart of acutely hazardous waste)?			
	c. * Is waste from the satellite area moved to a waste management unit within 3 days once the 55 gallon limit (or 1 quart of acutely hazardous waste) is exceeded?			
	d. * Is the location of the satellite accumulation area documented?			
90*	Have all on-site and off-site hazardous waste recycling activities been registered with the TCEQ? (entered on NOR or TCEQ 0525, SQG and LQG only)			
91*	If hazardous waste is treated, stored, or disposed on-site, has the facility compiled a waste analysis plan (WAP) or obtained a permit for that activity?			
<b>Waste Regulations (Transportation and Disposal Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
92*	Does the facility use a TCEQ/EPA registered transporter? (CESQGs may transport their own waste, without a manifest, to an authorized disposal facility)			
93*	Does the facility use a TCEQ/EPA permitted treatment, storage, disposal (TSD) facility?			
94*	Does the facility manifest all hazardous and Class I waste that is transported? (SQG, LQG, and CESQGs that generate more than 220 lbs of Class I waste. Class I waste sent for recycling does not require a manifest.)			
95*	Does the facility have all applicable copies (generator/transporter/disposal) of manifests for the last 3 years? (SQG and LQG only)			
96*	Does the facility have Land Disposal Restriction (LDR) certification statements per waste stream and disposal facility for the last 3 years? (SQG and LQG only)			
<b>Universal Waste Regulations</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>

97	Does the facility currently manage any of its hazardous waste streams as “universal waste”?			
98*	If yes: Are the waste streams appropriately classified and eligible for coverage under the universal waste rule?			
99*	Are all containers holding universal waste properly labeled per 30 TAC 335.261?			
100*	Are containers kept closed?			
101*	Are all universal waste streams shipped to a Treatment, Storage Disposal (TSD) facility or universal waste handler within 1 year of their initial generation date?			
102*	If not, does the facility have appropriate documentation on hand to show that an extended time limit is needed to facilitate proper recovery, treatment or disposal?			
103*	If the facility is a Large Quantity Handler of universal waste, are all universal waste shipments accompanied by a bill of lading or other shipping document?			
104*	If you are a Large-Quantity Handler of universal waste, have you sent written notification of universal waste management to the TCEQ and obtained an EPA identification number before accumulating or exceeding the 5,000 kg storage limit? If you already have notified the TCEQ about your other solid waste management activities, you are not required to renotify the Agency.			
105*	Does the facility use a TCEQ/EPA permitted recycling or TSD facility?			
<b>Used Oil Regulations</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
106	Does the facility collect used oil from the public?			
107*	If yes, is the facility registered with the TCEQ as a used oil collection center?			
108*	Are all containers labeled with the words “USED OIL”?			
109*	Are containers kept closed?			
110	Are any hazardous fluids mixed with the used oil? (CESQG exempt)			
111*	If yes, is this mixture managed as a hazardous waste?			

112*	Does the facility use a TCEQ/EPA registered transporter to remove used oil? (Not necessary if transporting one 55 gallon drum or less)			
113*	Does the owner avoid transporting more than one 55 gallon drum of used oil to an authorized disposal/recycling facility at any time?			
<b>Used Oil Filter Regulations</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
114*	Are all containers labeled with the words "USED OIL FILTERS"?			
115*	Are containers kept closed?			
116*	Are filters drained before recycling?			
117*	Does the facility store 6 or fewer 55 gallon drums of filters at any time?			
118*	Does the facility use a TCEQ registered transporter to remove the filter? (Not necessary if transporting two 55 gallon drums or less)			
119*	Does the facility use a bill of lading when having the filters transported?			
120*	Does the facility keep used oil filters separate from other type of filters (e.g. fuel)?			
<b>Lead Acid Battery Regulations</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
121*	If the facility sells batteries, is it registered with the state comptroller and collecting the appropriate fee?			
122*	Are all used batteries sent to an authorized facility for recycling or reclamation?			
123*	If the facility reclaims batteries on-site, has the TCEQ been notified?			
<b>Discharge to Publicly Owned Treatment Works (POTW) (Sanitary Sewer System)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
124	Does the facility discharge process wastewater to the sewer system? If no, go to question 128.			
125*	If yes, has the facility obtained permission from the POTW to discharge process wastewater?			
126*	a. Does the POTW has an approved pretreatment program?			
	b. *Does the facility have a permit to discharge process wastewater to the POTW?			
	c. *Does the facility comply with the requirements of this permit?			

127*	If the POTW does not have an approved pretreatment program,			
	a. Is the facility a categorical industrial user subject to the requirements of any category in 40 CFR Parts 405 – 471?			
	b. *If yes, does the facility submit monitoring reports to the TCEQ each June and December?			
	c. * If no, does the facility submit semi-annual monitoring reports to the TCEQ as a significant non-categorical industrial user? (If so it is also recommended that the facility contact the city and inform them of the nature of their discharge.)			
<b>Discharges to Water in the State</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
128	Does the facility discharge wastewater into surface water (via outfall, run-off, storm drains, rivers, creeks, dry waterways etc)? If no, go to question 131.			
129*	If yes, does the facility have a Texas Pollutant Discharge Elimination System (TPDES) Permit?			
130*	a. * If yes, does the facility meet the daily average flow from each outfall?			
	b. * Does the facility meet the daily maximum flow from each outfall?			
	c. * Does the facility meet the discharge limitation for each parameter?			
	d. * Does the facility conduct monitoring and sampling as required by their discharge permit?			
	e. * Does the facility submit discharge monitoring reports (DMRs) as required by their permit?			
	f. * Does the facility submit non-compliance reports as required by 40 CFR 122.41 and 30 TAC 305.125?			
	g. * Does the facility's TPDES wastewater permit discharge permit include storm water discharges?			
	h. * Is the facility in compliance with storm water discharge requirements listed in their TPDES wastewater discharge permit?			
131	Does the facility dispose of wastewater adjacent to surface water (by irrigation, evaporation pond, subsurface injection, or another approved method)?			

132*	If yes, does the facility have a Texas Land Application Permit? (Note: If hazardous or Class I industrial waste is being disposed of, then multiple other regulations apply.)			
133*	<b>Discharges to on-site septic facilities</b> Does the facility avoid discharging any process wastewater to a septic system? (Note: On-site septic systems can only be used for domestic sewage)			
<b>Storm Water Discharges</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
134	Does the facilities primary SIC code require coverage by a storm water permit?			
135*	Does the facility have coverage under the Multi-Sector General Permit (MSGP) for discharges from Industrial Activities or the No Exposure Certification (NEC)?			
<b>For facilities covered under the MSGP for Discharges from Industrial Activities</b>				
136*	Has the facility developed and implemented a Storm Water Pollution Prevention Plan (SWP3)?			
137*	Does the facility adhere to the SWP3 requirements outlined in the MSGP?			
138*	<b>Does the facility follow sampling, monitoring, and reporting requirements in the MSGP for:</b>			
	a. * Annual hazardous metal monitoring? (facilities can opt out of all or part of this requirement if they meet certain requirements)			
	b. *Quarterly visual monitoring? (applies to all facilities)			
	c.* Analytical monitoring (aka benchmarks) twice per year. Benchmark sampling is not required for facilities in Sectors I, P, R, V, W, X, Z, AB, AC.			
	* Are monitored discharges within benchmark limits? If not, have actions been taken to improve the quality of discharges?			
	d. *Sector specific numeric effluent limitation monitoring? (this applies only to Sectors A, C, D, E, J, O)			
	e. * Quarterly facility inspections? (this applies to all facilities)			
	<b>Does the facility:</b>			
	f. *Maintain and update records as required?			

	g.* Submit DMRs to the TCEQ by March 31 of each year for annual hazardous metals, benchmarks and sector-specific effluent limits?			
	h.* Maintain a rain gauge on-site or utilize one in the immediate vicinity of the site?			
	i.* At a minimum monitor the rain gauge once per week, and once per day during a rain event?			
	j.* Maintain a log for their rain gauge monitoring?			
<b>For facilities covered under the NEC:</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
139*	Does the facility avoid storing any industrial materials or conducting activities in areas exposed to storm water? This includes activities where exposed industrial machinery or equipment at the facility are used, stored or cleaned and areas where residuals are or may be deposited from the usage, storage, or cleaning of industrial machinery or equipment.			
140*	No materials or residuals are on the ground or in storm water inlets from spills/leaks exposed to storm water.			
141*	No materials or products from past industrial activity are exposed to storm water.			
142*	No material handling equipment (except adequately maintained vehicles) is exposed to storm water.			
143*	There are no materials or products during loading/unloading or transporting activities that may be exposed to storm water.			
144*	No materials or products are stored outdoors that may be exposed to storm water. (Exception - final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants).			
145*	No materials are contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers that may be exposed to storm water.			
146*	No materials or products are handled/stored on roads or railways owned or maintained by the operator that may be exposed to storm water.			

147*	There is no waste material (except waste in covered, non-leaking containers [e.g., dumpsters]) that may be exposed to storm water.			
148*	There are no activities including application or disposal of process wastewater that are not otherwise permitted that may be exposed to storm water.			
149*	There is no particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge.			
<b>Public Water Supply</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
150	Does the facility use a private well to supply drinking water to employees and customers? If no, questions 151 through 159 do not apply.			
151	Does the facility provide drinking water from a private well to 25 individuals a day for at least 60 days a year?			
152	What type of PWS system does the facility have?			
	a. transient, non-community – serves at least 25 people at least 60 days of the year and does not include residential service connections.			
	b. non-transient, non-community – serves at least 25 of the same people at least 6 months out of the year and does not include residential service connections.			
153	What is the water source for the PWS?			
	a. ground water			
	b. surface water			
	c. ground water under the influence of surface water			
154*	Is the facility registered with the TCEQ as a PWS?			
155*	Does the facility have a licensed operator? (applies to non-transient, non-community system only)			
156*	Does the facility conduct monthly microbiological testing?			
157*	Does the facility conduct chlorine residual testing?			

158*	* Does the facility conduct other contaminant testing as required for their system?			
	Indicate what contaminants the facility is testing for: _____ _____ _____			
159*	*Does the facility conduct water pressure testing?			
<b>Other Requirements</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
160	If the facility uses more than 10,000lbs (~ 20 drums) of cleaning chemicals or other listed chemicals in a year, and has more than 10 full-time employees, does the facility report under the Toxic Release Inventory?			
161*	Does the facility comply with the Texas Department of State Health Services' requirements for Tier II?			
162	Is the facility subject to the Waste Reduction Policy Act (WRPA)?			
163*	If yes,			
	a. *Has a Source Reduction Waste Minimization Plan (SR/WM) been developed? (SQGs, LQGs, and TRI reporters submit once every 5 years)			
	b. *Has an Executive Summary of the SR/WM Plan and a Certificate of Completeness and Correctness been submitted? (SQGs, LQGs and TRI reporters only)			
	c. *Has an Annual Progress Report been submitted? (SQGs, LQGs and TRI reporters only)			
164*	Does the facility have Material Safety Data Sheets (MSDS) or other information for all chemicals used in the past 24 months?			
165	Have there been any spills at the facility?			
166*	If yes, has the facility taken appropriate reporting and abatement actions?			
167*	Does the facility practice good housekeeping?			
<b>Air Regulations (30 TAC 115 Requirements)</b> In addition to any other requirements, coating, solvent using, and degreasing processes in the following counties must meet the requirements outlined in this section.				

<b>El Paso Area</b>	<b>Dallas/Ft. Worth Area</b>	<b>Houston/Galveston Area</b>	<b>Beaumont/Port Arthur Area</b>	<b>Other</b>	
El Paso	Johnson Kaufman Parker Rockwall Collin Denton Dallas Tarrant Ellis	Brazoria Chambers Fort Bend Galveston Harris Liberty Montgomery Waller	Hardin Orange Jefferson	Bastrop Bexar Caldwell Comal Gregg Guadalupe	Hays Nueces Travis Victoria Williamson Wilson
In addition to other requirements, sources of Volatile Organic Compounds (VOC) located in the counties listed above may be required to meet requirements outlined in 30 TAC 115.					
<b>Air Regulations (Specific 30 TAC 115 Requirements)</b>			<b>Yes</b>	<b>No</b>	<b>N/A</b>
168*	If located in the Beaumont/Port Arthur, Dallas/Ft. Worth, El Paso, or Houston/Galveston areas, does the facility meet an exemption from 115 by either:				
	a. * VOC emissions being less than 3 lb/hr and 15 lb in any 24 hour consecutive period, OR				
	b. coating and solvent usage being less than 150 gallons per year?				
169*	If located in Gregg, Nueces, or Victoria counties, are the VOC emissions less than 550 lbs in any 24 hour consecutive period?				
170*	Does the facility have records to support exemption status?				

171*	If the facility does not meet an exemption:			
	a. *Do the coatings used at the facility meet the emissions limits specified in 30 TAC 115.421?			
	b. *Does the facility use any applicable control requirements specified in 30 TAC 115.422, or meet the applicable alternate method requirements in 30 TAC 115.423?			
	c. *Does the facility use the test methods required in 30 TAC 115.425 to determine compliance with emission limits or alternate control requirements?			
	d. * Does the facility maintain material safety data sheets for coatings and solvents used, records of the quantities and types of coatings and solvents used, records of required testing, and any other applicable records required in 30 TAC 115.426?			
<b>Air Regulations (Specific 30 TAC 115 Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
172	Does the facility have a degreaser?			
173*	Does the degreaser meet the control requirements in 30 TAC 115.412 or 115.413? *An exemption in 115.417 may apply*			
174*	Are the required tests in 30 TAC 115.415 being conducted?			
175*	Are records of maintenance and test results being kept for at least two years?			
176	Does this facility have any other processes, activities, or equipment subject to Chapter 115 rules? These include, but are not limited to:			
	a. Storage of volatile organic carbons (VOCs) (Subchapter B, Division 1);			
	b. VOC water separator (Subchapter B, Division 3);			
	c. Industrial wastewater containing VOCs (Subchapter B, Division 4);			
	d. Batch Process (Subchapter B, Division 6);			
	e. Sale of windshield washer fluid or portable fuel containers (Subchapter G)			
<b>Air Regulations (30 TAC 117 Requirements – Dallas/Fort Worth Area)</b>				
In addition to other requirements, facilities located in the counties in the <b>Dallas/Ft. Worth Ozone Nonattainment Area</b> listed above must meet the requirements in this section.				
<b>Air Regulations 117 Requirements – DFW</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>

177	Is the facility a major source of NO <sub>x</sub> as defined in 117.10(29)?			
178*	If yes, is the facility compliant with all applicable parts of 117 Subchapter B?			
179*	Is the facility a minor source of NO <sub>x</sub> , operating a stationary internal combustion engine?			
	a. *If yes, is the facility meeting an exemption listed in 117.2103?			
	b. *If yes, does the facility have records showing compliance with the exemption and 117.2130(c), 117.2135(e), and 117.2145(b) and (c)?			
180*	If the facility is not meeting an exemption, does the engine meet the associated emission specification and does the facility comply with the applicable operational, testing, reporting and recordkeeping requirement in 117 Subchapter D?			

**Air Regulations (30 TAC 117 Requirements – Houston/Galveston Area)**

In addition to other requirements, facilities located in the counties in the **Houston/Galveston Ozone Nonattainment Area** listed above must meet the requirements of this section.

<b>Air Regulations 117 Requirements – HGB</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
181	Is the facility a major source of NO <sub>x</sub> as defined in 117.10(29)?			
182*	If yes, is the facility compliant with all applicable parts of 117 Subchapter B?			
183*	Is the facility a minor source of NO <sub>x</sub> , operating a boiler, process heater, gas turbine, or stationary internal combustion engine?			
	a. *If yes, is the facility meeting an exemption listed in 117.2003?			
	b. *If yes, does the facility have records showing compliance with the exemption and 117.2030(c), 117.2035(g), and 117.2045(b) and (c)?			
185*	If the facility is not meeting an exemption, does the equipment meet the associated emission specification and does the facility comply with the applicable operational, testing, reporting and recordkeeping requirement in 117 Subchapter D?			

**Multimedia Recordkeeping Review**

186	Can the facility demonstrate adequate recordkeeping with all applicable rules and permits? Note: A minimum of 25% of all required records must be reviewed during the site visit. List records reviewed in the comment section below.			
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**Comments:**

[This checklist is for guidance purposes only. It is not a substitute for the rules and regulations. The Small Business & Local Government Assistance \(SBLGA\) Program is an independent section, separate from enforcement of the Texas Commission on Environmental Quality \(TCEQ\). Contact SBLGA on its toll-free hotline 800-447-2827 or on the SBLGA Web site.](#)