Small Business and Local Government Assistance

High Intensity Compliance Checklist

This checklist is for guidance purposes only. It is not a substitute for the rules and regulations. The Small Business and Local Government Assistance (SBLGA) program is separate from the Office of Compliance and Enforcement (OCE) of the Texas Commission on Environmental Quality (TCEQ). Contact SBLGA on its toll-free hotline 800-447-2827 or visit the SBLGA website <www.texasenvirohelp.org>.

Company Information ____1st visit ____2nd 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	
RN/CN		Facility ID	

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?* _____

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

Air Regulations (30 TAC 106) – Permits by Rule

Rule Citation	Question	Yes	No	N/A
30 TAC 106.4, 106.8	*Can the facility demonstrate compliance with the General Requirements of 30 TAC 106.4 and 106.8?			
30 TAC 106	*Does the facility have documentation that they have correct and complete APD CERT or PI-7 CERT authorizations if applicable?			

Air Regulations

Rule Citation	Question	Yes	No	N/A
30 TAC 112	*Does the facility have documentation to support PTE determination?			
	*Can the facility demonstrate compliance with ALL air authorizations including monitoring? Review records for accuracy and compliance.			
30 TAC 101	*Can the facility demonstrate that they are in compliance with upset reporting requirements?			
30 TAC 116	*Can the facility demonstrate that all applicable MAERT table items are accurate for the day of the visit?			

Rule Citation	Question	Yes	No	N/A
40 CFR Part 63, Subpart N	*(NESHAP Hex-chrome) Does the facility have EPA publication 453R94082B and have the forms been completed and submitted to EPA?	☐	☐	☐
40 CFR Part 63, Subpart T	*(NESHAP for Halogenated Solvent Degreaser) Does the facility have EPA publication 453R94081 and have the forms have been completed and submitted to EPA?	☐	☐	☐
30 TAC 117	*If applicable, can the facility demonstrate compliance with NOx RACT requirements?	☐	☐	☐
40 CFR Part 60	*If applicable, can the facility demonstrate compliance with NSPS requirements?	☐	☐	☐
	Does the facility have any additional air issues that are not covered in this checklist that need to be addressed?	☐	☐	☐

Air Regulations (30 TAC 122) – Federal Operating Permit

Rule Citation	Question	Yes	No	N/A
30 TAC 122	*If the facility is required to have a federal operating permit, can the facility demonstrate how they address changes to the SOP/GOP? Confirm that deviations are reported in a timely manner. Verify that records support the deviation reports.	☐	☐	☐

Stormwater Discharges

Rule Citation	Question	Yes	No	N/A
MSGP Part II, Section C. 4.	*Does the facility have documentation to verify their Storm Water Pollution Prevention Plan is current and updated? Discuss potential changes with the facility representatives.	☐	☐	☐
MSGP Part III, Section B. – E.	*Does the facility have monitoring results that confirm they are meeting applicable effluent limitations and benchmark numbers?	☐	☐	☐
MSGP Part III, Section E. 6.(b)	*Does the facility have documentation to confirm that non-compliant results have been addressed?	☐	☐	☐

Publicly Owned Treatment Works

Rule Citation	Question	Yes	No	N/A
40 CFR 403.12	*Does the facility have sampling/analysis reports that show compliance with pretreatment discharge limits? (Review most recent 3 years or check 15% of the representative reports.)	☐	☐	☐
40 CFR 403.16	*Does the facility have a process in place for correcting the cause of any non-compliant results?	☐	☐	☐
TWC 26.039	Does the facility have complete and accurate sewage spill/overflow report files for the last three years? Compare with applicable regulatory and/or permit spill reporting requirements.	☐	☐	☐

Water Quality

Rule Citation	Question	Yes	No	N/A
TWC 26.121	*Does the facility have documentation that each wastewater stream (volume and content) has been identified and whether it is authorized by permit? Verify from process flow diagrams and/or field inspection that there are not any unauthorized wastewater di			
30 TAC 319.7(c)	*Does the facility have DMRs to show compliance with discharge limits? Review facility's DMRs for past 3 years.			
	*Does the facility have documentation to confirm that non-compliant DMRs are resolved?			
30 TAC 319.7(c)	*Does the facility have instrument calibration records/procedures? If yes, compare with permit requirements to verify compliance.			
30 TAC 319.11	*Does the facility have documentation to verify that it is using the correct monitoring/analytical method as specified in the permit?			

Waste Issues

Rule Citation	Question	Yes	No	N/A
30 TAC 335.9(a)(1)(A)	*Does the facility have documentation to confirm that all waste profiles are complete and correct? (Audit all active profiles)			
30 TAC 335.6	Does the facility have complete, accurate and up to date information on the NOR? Review each aspect of the NOR and discuss any unusual entries with the facility representative.			
30 TAC 335.6	*a. Business Information			
30 TAC 335.6	*b. Waste Codes			
30 TAC 335.6	*c. Waste Management Units			
30 TAC 335.9(a)	*Does the facility have complete and accurate manifests that match NOR data? (Audit last manifest and 15%)			
30 TAC 335.9(a)(2)	*Does the facility have a correct Annual Waste Summary? Does each waste listed on the Annual Waste Summary match an active waste stream on the NOR? (Verify for the most recent 3 years)			
30 TAC 335.8	*Does the facility have documentation to verify that all closed or inactive WMUs are in the process of or have completed closure? Confirm that any WMU showing a status of inactive on the NOR, is temporarily inactive or if it needs to be taken through the			
40 CFR 300 Subpart I	*Does the facility have documentation that its RCRA Contingency Plan is current, has been submitted to local agencies, and addresses all handling of on-site hazardous waste?			
	Does the facility have any additional waste issues that are not covered in this checklist that need to be addressed?			

Other

Rule Citation	Question	Yes	No	N/A
	Does the facility have any other noncompliant environmental issues that are not addressed by this checklist?			

There must be a clear understanding of facility operations for each site visit conducted. Provide

the following components based on information obtained from the site:

Rule Citation	Question	Yes	No	N/A
	(A) A brief process description that includes the following types of information:	☐	☐	☐
	(1) Types and amounts of raw materials used in process(es)	☐	☐	☐
	(2) Types and amounts of products manufactured at site	☐	☐	☐
	a. Types, numbers, and capacity of process equipment	☐	☐	☐
	b. Types, numbers, and capacity of ancillary equipment (i.e. boilers, heaters, tanks)	☐	☐	☐
	c. Description of air pollution abatement equipment, if any.	☐	☐	☐
	d. Description of wastewater treatment equipment, if any.	☐	☐	☐
	e. Description of major solid/hazardous waste streams.	☐	☐	☐
	(B) A simplified Block Process Flow Diagram (PFD) illustrating:	☐	☐	☐
	Major process equipment	☐	☐	☐
	Raw materials in	☐	☐	☐
	Products out	☐	☐	☐
	Air emission points, & air pollution abatement equipment	☐	☐	☐
	Wastewater discharge points, and wastewater treatment units	☐	☐	☐
	Ancillary equipment (boilers, heaters, tanks)	☐	☐	☐
	(C) Review air authorizations for compliance criteria	☐	☐	☐
	(D) Review the publicly owned treatment works pretreatment permit for compliance criteria	☐	☐	☐
	(E) Review the TPDES permit for compliance criteria	☐	☐	☐

Comments