



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

Company Information	1 <sup>st</sup> visit	2 <sup>nd</sup> visit	Other	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 NOTE:** Compliance related questions are denoted with a checkmark (✓). Answering “no” to a question with a checkmark may mean the facility is out of compliance with state or federal environmental rules.

Air Regulations – Authorizations can be obtained in one of three ways:					
• Permit by Rule (PBR)					
• Standard Permit					
• New Source Review (NSR) Permit					
			Yes	No	N/A
1	Does this facility have an air account number? If yes, Account No. _____				
2✓	Does this facility have an air permit? If yes, Permit No. _____				
3✓	If yes: Does the facility comply with all permit conditions? (Use comments section)				
4✓	Does the facility claim a Permit by Rule (PBR)?				
5	If yes, Does the facility meet all requirements of the PBR(s) claimed? See Below				
	✓ <input type="checkbox"/> 106.227 – Soldering, Brazing, Welding				
	✓ <input type="checkbox"/> 106.265 – Handheld and Manually Operated Machines				
	✓ <input type="checkbox"/> 106.432 – Dipping Tanks and Containers				
	✓ <input type="checkbox"/> 106.433 – Surface Coating Facility (if yes, see question 8 for more information)				
	✓ <input type="checkbox"/> 106.434 – Powder Coating Facility				
	✓ <input type="checkbox"/> 106.451 – Wet Blast Cleaning				
	✓ <input type="checkbox"/> 106.452 – Dry Abrasive Blasting (if yes, see question 26 for more information)				
	✓ <input type="checkbox"/> 106.473 – Organic Liquid Loading and Unloading				
	✓ <input type="checkbox"/> Other/Previous PBR: _____				
	✓ <input type="checkbox"/> Other/Previous PBR: _____				
	✓ <input type="checkbox"/> Other/Previous PBR: _____				
6✓	Does the facility maintain records that demonstrate compliance as required by 30 TAC 106.8 for all PBRs?				
7✓	Does the facility avoid being a nuisance (noise, dust, odor, etc)?				
Facilities Claiming PBR 106.433 – Surface Coating Operations			Yes	No	N/A
8✓	Are booths or work area exhaust fans operating when cleaning spray guns and equipment?				
9✓	Are coatings and solvents stored in closed containers?				
10✓	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: 30lbs/hr VOC and 5lb/hr exempt solvents?				
11✓	Are emissions less than 0.25lbs/hr of VOC and/or exempt solvents? (if yes go to question 26)				
12✓	Is the opacity of visible emissions less than 5%?				
13✓	Is the emission rate no greater than 6lbs/hr (averaged over a 5 hour period), and 500lbs/wk: per booth/enclosed work area; if outdoors, for all operations at any time?				
14	Is your surface coating operation performed in an enclosed work area or booth? (if not, go to question 19)				

15✓	Is the maximum face velocity at the intake opening at least 100ft/min and are emissions exhausted through elevated stacks at least 1.5 times the building height above ground level?			
16✓	For spray operations, are particulate emissions controlled by either a wash water system or dry filter system with removal efficiency of at least 95%?			
17✓	Is the face velocity at the filter not exceeding 250ft/min or that specified by the manufacturer?			
18✓	Is the stack rain protection not obstructing vertical discharge of emissions?			
19	Is your surface coating operation performed outdoors or in a non-enclosed work area? (if not, go to question 26)			
20	Are coatings applied with spray equipment? (if not, go to question 22)			
21✓	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 2,000lbs/yr?			
22✓	Are coating operations conducted at least 50ft. from the nearest property line and at least 250ft. 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?			
23✓	Has written TCEQ approval been received?			
24✓	Are MSDSs for all coatings and solvents kept on-site, along with hourly, daily, weekly, and monthly records of coating and solvent use, including actual hours of operation and pounds of VOCs emitted, and tons of VOCs emitted from the site in the previous 12 months?			
25✓	Has the facility registered with the TCEQ using form PI-7?			
<b>Facilities claiming PBR 106.452 – Dry Abrasive Blasting</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
26✓	Is the facility conducting enclosed abrasive blasting? (if outside blast cleaning go to question 30)			
27✓	Are particulate matter emissions evacuated through a mechanically cleaned fabric filter with a maximum filtering velocity (air/cloth ratio) of 4ft/min or evacuated through an air cleaned (pulse jet) fabric filter with a maximum filtering velocity of 7ft/min?			
28✓	Does the facility prevent fugitive emissions from leaving the property?			
29	Is the facility conducting outside blast cleaning? (if no, go to question 34)			
30✓	Is the abrasive usage rate less than 150 tons per year, 15 tons/month and 1 ton per day?			
31✓	Are records of operating hours and abrasive material usage maintained?			
32✓	Is blast cleaning performed at least 500ft. 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?			
33✓	Has the facility registered with the TCEQ using form PI-7?			

**Air Regulations (30 TAC 115 Requirements)**

In addition to any other requirements, coating, solvent using, and degreasing processes in the following counties must meet the requirements outlined in this section.

Beaumont/Port Arthur Area		Dallas/Ft. Worth Area		Houston/Galveston Area		El Paso Area	Other
Hardin	Orange	Collin	Denton	Galveston	Harris	El Paso	Gregg
Jefferson		Dallas	Tarrant	Chambers	Liberty		Nueces
		Ellis	Johnson	Fort Bend			Victoria
		Kaufman	Parker	Brazoria			
		Rockwall		Montgomery	Waller		

<b>Air Regulations (Federal and 30 TAC 115 Requirements) If surface coating processes emit less than 3lbs/hr of VOC and no more than 15lbs in any 24 consecutive hours, those processes are exempt from Chapter 115 requirements</b>		Yes	No	N/A
34✓	Does the facility keep recommended hourly usage records for all coatings and solvents?			
35✓	Does the facility have daily usage records to demonstrate that it meets the 3lb/hr and 15lb/24hr emission limits?			

**Air Regulations (Chapter 101) – Emission, Maintenance, Start-up, Shutdown**

Non Attainment Areas			Early Action Compact Areas		Maintenance Area	Other Areas
Brazoria	Chambers	Collin	Bastrop	Bexar	Victoria	Nueces San Patricio
Dallas	Denton	El Paso	Caldwell	Comal		
Ellis	Ft. Bend	Galveston	Gregg	Guadalupe		
Hardin	Harris	Jefferson	Harrison	Hays		
Johnson	Kaufman	Liberty	Rusk	Smith		
Montgomery	Orange	Parker	Travis	Upshur		
Rockwall	Tarrant	Waller	Williamson	Wilson		

Air Regulations (Chapter 101)		Yes	No	N/A
36✓	Does the facility track all reportable and non-reportable emission events and report them to TCEQ by March 31 of each year? (101.201)			
37✓	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)			
38✓	Are all records maintained for a minimum of 5 years?			

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products		Yes	No	N/A
39	a. Does the facility use less than 250 gallons per year of coatings containing Hazardous Air Pollutants (HAPs)? If yes, go to question # 40			
	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? If yes, go to question # 40			
	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?			

Petroleum Storage Tank (PST) Regulations		Yes	No	N/A
40	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?			
41✓	Are the appropriate records being maintained for the recordkeeping requirements of 30 TAC 334.10?			
42✓	Have all motor fuel USTs been properly labeled?			
43✓	Is the facility involved in retail sales and required to keep Inventory Control records?			
44✓	Do all USTs meet TCEQ requirements for corrosion protection, spill and overfill prevention, leak detection, financial assurance, etc.?			
45	Do any of the following conditions exist regarding storage tanks? Check all that apply. <input type="checkbox"/> Total aboveground capacity of the facility is greater than 1,320 gallons? <input type="checkbox"/> Total capacity in underground tanks, that do not meet UST standards of either 40 CFR280 or 281, is greater than 42,000 gallons?			
46	If yes, does the facility have a Spill Prevention Control & Countermeasure (SPCC) Plan? Contact the USEPA Region 6 Office in Dallas at (214) 665-2277.			
47✓	Does the facility have an exemption for Stage II or meet Stage I and Stage II requirements if necessary?			

Waste Regulations (General Requirements)		Yes	No	N/A							
48✓	Has the facility performed a hazardous waste determination on all solid waste streams?										
49✓	Does the facility maintain documentation to support all hazardous waste determinations?										
50✓	Does the facility have records of monthly waste generation to support its claimed generator status? Indicate the generator status claimed.										
	<table border="0"> <tr> <td style="text-align: left;"><u>Generator Status</u></td> <td style="text-align: right;"><u>Accumulation Time/Accumulation Quantity</u></td> </tr> <tr> <td><input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) up to 220lbs.....</td> <td>No limit/2,200 lbs or less</td> </tr> <tr> <td><input type="checkbox"/> Small Quantity Generator (SQG) 220lbs to 2,200 lbs.....</td> <td>180 days or less<sup>1</sup>/13,200 lbs or less</td> </tr> <tr> <td><input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....</td> <td>90 days or less/no limit</td> </tr> </table> <p><sup>1</sup> Can be extended to 270 days if the generator must transport waste 200 miles or more.</p>				<u>Generator Status</u>	<u>Accumulation Time/Accumulation Quantity</u>	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) up to 220lbs.....	No limit/2,200 lbs or less	<input type="checkbox"/> Small Quantity Generator (SQG) 220lbs to 2,200 lbs.....	180 days or less <sup>1</sup> /13,200 lbs or less	<input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....
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<input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....	90 days or less/no limit										

51✓	Is this facility registered with the TCEQ as a hazardous waste generator? (not required for CESQG) TCEQ Registration No. _____ EPA ID _____			
52	Is the facility an industrial waste generator?			
53✓	If yes, is all non-hazardous waste classified as Class 1, Class 2, and Class 3?			
54✓	If this facility generates greater than 220lbs of Class 1 waste are they registered with the TCEQ? (Only required if not already registered as a SQG or LQG)			
55✓	Is the facility's Notice of Registration (NOR) up to date, including all waste streams and waste management units? (Not required for CESQG)			
56✓	Has the facility submitted an Annual Waste Summary each year? (Not required for CESQG)			
57✓	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>
58✓	Does the facility comply with appropriate accumulation time requirements?			
59✓	Does the facility comply with appropriate accumulation quantity requirements?			
60	Is hazardous waste accumulated in tanks at the facility?			
61	a. ✓ Has the tank system's integrity been assessed and certified by an independent, qualified, registered professional engineer? (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? (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? (LQG only – 40 CFR 265.193(e))			
62	Is hazardous waste accumulated in container storage areas at the facility?			
63✓	If Yes: Are waste containers labeled, dated, closed, and compatible with their contents? (Compliant for LQG and SQG Only, although CESQG may want to adhere to also)			
64	<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 number been posted by the telephone at the facility?			
65	Is hazardous waste accumulated in satellite accumulation areas at the facility?			
66	If yes: (required by 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?			
67✓	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)			
68✓	If hazardous waste is treated, stored, or disposed of 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>
69✓	Does the facility use a TCEQ/EPA registered transporter? (CESQGs may transport their own waste, without a manifest, to an authorized disposal facility)			
70✓	Does the facility use a TCEQ/EPA permitted treatment, storage, disposal (TSD) facility?			
71✓	Does the facility manifest all hazardous and Class I waste that is transported? (SQG, LQG, and CESQGs that generate more than 220lbs of Class I waste. Class I waste sent for recycling does not require a manifest.)			
72✓	Does the facility have copies of manifests (green and white) for the last 3 years? (SQG and LQG only)			
73✓	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>
74	Does the facility currently manage any of its hazardous waste streams as “universal waste”?			
75✓	If yes: Are the waste streams appropriately classified and eligible for coverage under the universal waste rule?			
76✓	Are all containers holding universal waste properly labeled per 30 TAC 335.261?			
77✓	Are containers kept closed?			
78✓	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?			
79✓	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?			
80✓	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?			
81✓	Does the facility use a TCEQ/EPA permitted recycling or TSD facility?			
<b>Discharge to Publicly Owned Treatment Works (POTW) (Sanitary Sewer System)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
82	Does the facility discharge process wastewater to the sewer system?			
83	If yes, has the facility obtained permission from the POTW to discharge process wastewater?			
84	a. If the POTW has an approved pretreatment program, does the facility have a permit to discharge process wastewater to the POTW?			
	b. Does the facility comply with the requirements of this permit? If this question is not applicable move on to question 86.			
85	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, the facility may be required to submit semi-annual monitoring reports to the TCEQ if it is a significant non-categorical industrial user. 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>
86	Does the facility discharge wastewater into surface water (via run-off, storm drains, rivers creeks, dry waterways etc)?			
87✓	If yes, does the facility have a Texas Pollutant Discharge Elimination System (TPDES) Permit?			
88	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 constituent?			
	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 20 CFR 122.41 and 30 TAC 305.125?			
	g. ✓ Does the facility’s TPDES wastewater permit discharge permit include storm water discharges? If yes, skip questions 92 – 96.			
	h. ✓ Is the facility in compliance with storm water discharge requirements listed in their TPDES wastewater discharge permit?			
89	Does the facility dispose of wastewater adjacent to surface water (by irrigation, evaporation pond, subsurface injection, or another approved method)?			
90✓	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.)			
91✓	<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>
92✓	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>				
93✓	Has the facility developed and implemented a Storm Water Pollution Prevention Plan (SWP3)?			
94✓	Does the facility adhere to the SWP3 requirements outlined in the MSGP?			

95	Does the facility follow the sampling, monitoring, and reporting requirements outlined in the MSGP? 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) (facilities in Sectors I, P, R, V, W, X, Z, AB, AC, AD do not have benchmark requirements) d. ✓ Sector Specific Numeric Effluent Limitation Monitoring? (applies to Sectors A, C, D, E, J, O only) e. ✓ Quarterly facility inspections? (applies to all facilities) f. ✓ Does the facility maintain and update records as required? g. ✓ Does the facility submit DMRs to the TCEQ by March 31 of each year for annual hazardous metals, benchmarks and sector-specific effluent limits? h. ✓ Does the facility maintain a rain gauge on-site or utilize one in the immediate vicinity of the site? i. ✓ Does the facility, at a minimum, monitor the rain gauge once per week, and once per day during a rain event? j. ✓ Does the facility maintain a log for their rain gauge monitoring?			
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**For facilities covered under the NEC**

96✓	Is the facility meeting the requirements of the No Exposure Certification?			
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**Public Water Supply**

		Yes	No	N/A
97	Does the facility use a private well to supply drinking water to employees and customers? If no, skip to question 107			
98	Does the facility provide drinking water from a private well to 25 individuals a day for at least 60 days a year? If no, skip to question 107			
99	What type of PWS system does the facility have? <input type="checkbox"/> transient, non-community – serves at least 25 people at least 60 days of the year and does not include residential service connections <input type="checkbox"/> 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			
100	What is the water source for the PWS? <input type="checkbox"/> ground water <input type="checkbox"/> surface water <input type="checkbox"/> ground water under the influence of surface water			
101	✓Is the facility registered with the TCEQ as a PWS?			
102	✓Does the facility have a licensed operator? (non-transient, non-community system only)			
103	✓Does the facility conduct monthly microbiological testing?			
104	✓Does the facility conduct chlorine residual testing?			
105	✓Does the facility conduct other contaminant testing as required for their system? Indicate what contaminants the facility is testing for: _____ _____			
106	✓Does the facility conduct water pressure testing?			

Other Requirements		Yes	No	N/A	Multiplier
107	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?				
108	Does the facility comply with the Texas Department of Health’s requirements for Tier II?				
109	Is the facility subject to the Waste Reduction Policy Act (WRPA)?				
110	If yes, a. ✓ Has a Source Reduction Waste Minimization Plan (SR/WM) been developed? (SQGs, LQGs, and TRI reporters submit once every 5 years)				0.50
	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)				0.50
	c. ✓ Has an Annual Progress Report been submitted? (SQGs, LQGs and TRI reporters only)				0.50

Other Requirements		Yes	No	N/A	Multiplier
111✓	Does the facility have Material Safety Data Sheets (MSDS) or other information for all chemicals used in the past 24 months?				0.25
112	Is there any evidence of spills?				
113✓	If yes, has the facility taken appropriate reporting and abatement actions?				1.00
114✓	Does the facility practice good housekeeping?				0.50

**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 their toll-free hotline (800) 447-2827 or on the internet at [www.sblga.info](http://www.sblga.info)