



Small Business Assistance Program Metal Finishers Compliance Checklist

Company Information

Business Representative Present for Assessment: _____ Date: _____

Company Name: _____

Physical Address: _____ City: _____

Mailing Address: _____ Zip Code: _____

Owner's Name: _____ Business Phone: _____

Date of Construction: _____ Primary SIC Code: _____

Start of Operation (if different): _____ Latitude and Longitude _____

Air Regulations (Operating Authorization)

A facility can be grandfathered if operations began before 9/1/71. Otherwise, all facilities that emit air pollutants must have authorization from the TNRCC before beginning construction or opening for business. Authorization can be obtained in one of two ways:

- exemption from permitting
- permit

		YES	NO	N/A
1.	Does the facility claim grandfathered status?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	If Yes: has the facility's operation changed (equipment, supplies, production level) since 9/1/71?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Does the facility have an air permit? Account or permit # _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	If Yes: Does the facility comply with all permit conditions? (Use "Comments" Section.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Does the facility claim an exemption for metal finishing and/or plating processes? ¹ Indicate all that apply.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/> 106.375 <input type="checkbox"/> 106.376			
	<input type="checkbox"/> 106.262 <input type="checkbox"/> Previous Standard Exemption(s): _____			
6.	Does the facility claim exemptions to cover other emission-producing processes such as abrasive blast cleaning, degreasing, loading organic liquids, storing hydrochloric acid, and surface coating ¹ ? List all that apply: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	If Yes: Does the facility meet all requirements of the exemption(s) claimed? (Use "Comments" Section.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Does the facility practice good housekeeping?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹Facilities may meet the requirements of any exemption in effect on, or published after, the start of facility construction.

Air Regulations (Federal Requirements)

9. Does the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Chrome Plating and Chrome Anodizing apply to this business? YES NO N/A
10. If Yes: Does the business meet required emission limits? YES NO N/A
- a. Does the business follow required work practice standards? YES NO N/A
 - b. Has the business completed its initial emission testing if required? YES NO N/A
 - c. Does the business conduct required monitoring of emission controls? YES NO N/A
 - d. Does the business keep records to document compliance for 5 years? YES NO N/A
 - e. Does the business submit reports to EPA as required? YES NO N/A
11. Does the business use:
- a. trichloroethylene YES NO N/A
 - b. methylene chloride YES NO N/A
 - c. perchloroethylene YES NO N/A
 - d. chloroform YES NO N/A
 - e. 1,1,1-trichloroethane YES NO N/A
 - f. carbon tetrachloride YES NO N/A
11. If Yes: then the NESHAP for Solvent Degreasing Units apply
- a. For Batch Vapor & In-line Cleaning Machines:
 - i. Does the business meet the overall emission limit or the equipment standard for each machine? YES NO N/A
 - ii. If the equipment standard is used, does the business also meet basic design, work practice, and operator test requirements? YES NO N/A
 - b. For Batch Cold Cleaning Machines:
 - i. Does the business comply with equipment control and work practice requirements for each machine? YES NO N/A

Air Regulations (Chapter 115 Requirements)

In addition to any other requirements, facilities in the following counties that use degreasing units or perform surface coating processes must meet the requirements outlined in this section:

<i>Beaumont/Port Arthur Area</i>	<i>Dallas/Fort Worth Area</i>	<i>Houston/Galveston Area</i>	<i>El Paso Area</i>	<i>Other</i>
Hardin Jefferson Orange	Collin Dallas Denton Tarrant	Brazoria Chambers Fort Bend Montgomery Galveston Harris Liberty Waller	El Paso	Gregg Nueces Victoria

If surface coating processes emit less than 3 lb/hr of VOC and no more than 15 lb in any 24 consecutive hours, those processes are exempt from Chapter 115 (Regulation V) requirements.

- 12. Does the facility have daily usage records to demonstrate that it meets the 3 lb/hr and 15 lb/24-hrs emission limits? YES NO N/A
- 13. If degreasing is done at the facility, does the facility meet all applicable requirements of Subchapter E: Solvent-Using Processes, Degreasing Processes? YES NO N/A
- 14. If surface coating is done at the facility, does the facility meet all applicable requirements of Subchapter E: Solvent-Using Processes, Surface Coating Processes? YES NO N/A
- 15. Does the business keep recommended hourly records of coating and solvent usages? YES NO N/A

Waste Regulations (General Requirements)

- 16. Has the business performed a hazardous waste determination on all solid waste streams? YES NO N/A
- 17. Does the business maintain documentation to support all hazardous waste determinations? YES NO N/A
- 18. Does the business have records of monthly waste generation to support its claimed generator status? YES NO N/A

Indicate the generator status claimed.

	<u>Accumulation Time</u>	<u>Accumulation Quantity</u>
<input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG)	No limit	2,200 lbs or less
<input type="checkbox"/> Small Quantity Generator (SQG)	180 days or less ²	13,200 lbs or less
<input type="checkbox"/> Large Quantity Generator (LQG)	90 days or less	No limit

- 19. Is the facility registered with the TNRCC as a hazardous waste generator?
 TNRCC Registration # _____ EPA ID _____ YES NO N/A
- 20. Is the facility an industrial waste generator? YES NO N/A
- 21. If Yes: Is all non-hazardous waste classified as Class 1, Class 2, or Class 3? YES NO N/A
- 22. Does the facility generate over 220 lbs per month of Class 1 waste? YES NO N/A
- 23. Is the business' Notice of Registration (NOR) up to date, including all waste streams and waste management units? YES NO N/A
- 24. Has the business submitted an Annual Waste Summary each year? YES NO N/A
- 25. Does the business fulfill all other recordkeeping and reporting requirements for its generator status? YES NO N/A

Waste Regulations (On-Site Accumulation Requirements)

- 26. Does the business comply with appropriate accumulation time requirements? YES NO N/A
- 27. Does the business comply with appropriate accumulation quantity requirements? YES NO N/A
- 28. Is hazardous waste accumulated in tanks at the business? YES NO N/A

² Can be extended to 270 days if the generator must transport waste 200 miles or more.

29. If Yes:
- a. Has the tank system's integrity been assessed and certified by an independent, qualified, registered professional engineer? YES NO N/A
 - b. Are tanks labeled with the words hazardous waste? YES NO N/A
 - c. Are records kept of daily tank inspections? YES NO N/A
 - d. Do tanks have a secondary containment system designed to contain 100% of the largest tank within its boundary? YES NO N/A
 - e. If Yes: Is the secondary containment designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system? YES NO N/A
 - f. If No: Does the collection system have sufficient excess capacity to contain run-on or infiltration of precipitation from a 25-year 24-hour rainfall event? YES NO N/A
30. Is hazardous waste accumulated in container storage areas at the business? YES NO N/A
31. If Yes: Are waste containers labeled, dated, closed, and compatible with their contents? YES NO N/A
32. If business is a Small Quantity Generator or Large Quantity Generator,
- a. Does the business conduct weekly container inspections for leakage and deterioration? YES NO N/A
 - b. Does the business document weekly container inspections? YES NO N/A
 - c. Have employees been trained in the handling of hazardous waste, with regards to their job duties? YES NO N/A
 - d. Has an emergency response coordinator and alternate been designated, available 24 hours a day to respond to on-site spills and accidents? YES NO N/A
 - e. Have emergency numbers been posted by the telephone at the facility? YES NO N/A
33. Is hazardous waste accumulated in satellite accumulation areas at the business? YES NO N/A
34. If Yes: Are waste containers labeled, closed, and compatible with their contents?
- a. Is the amount of accumulated waste at each satellite accumulation point less than 55 gallons (or 1 quart of acutely hazardous waste)? YES NO N/A
 - b. 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? YES NO N/A
35. Have all on-site Class 1 and hazardous waste recycling activities been registered with the TNRCC? YES NO N/A
36. If hazardous waste is treated, stored, or disposed of on site, has the business compiled a waste analysis plan (WAP) or obtained a permit for that activity? YES NO N/A

Waste Regulations (Transportation and Disposal Requirements)

- 37. Does the business use a TNRCC/EPA registered transporter (CESQGs may transport their own waste, without a manifest, to an authorized facility)? YES NO N/A
- 38. Does the business use a TNRCC/EPA permitted treatment, storage, disposal (TSD) facility? YES NO N/A

		YES	NO	N/A
39.	Does the business manifest all hazardous and Class 1 waste that is transported?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
40.	Does the business have copies of manifests (green & white) for the last 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
41.	Does the business have Land Disposal Restriction (LDR) certifications for the last 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Wastewater Regulations

Discharges to Publicly-Owned Treatment Works (sanitary sewer system)

42.	Does the business have any wet process areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
43.	If Yes, what type of waste is generated by the wet process? _____			
44.	If the process generates wastewater is it discharged to a sanitary sewer system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
45.	If no, how is the process wastestream disposed of? _____			
46.	Does the business meet all the conditions of the POTW permit? (Specifically is the business meeting all permitted effluent limits, self-monitoring and reporting requirements?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
47.	If no, what conditions are not being met? _____			
48.	If the business discharges a process wastestream into the sanitary sewer system but does not have a permit from the POTW, does the business report effluent monitoring results to TNRCC each June and December?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discharges to Water in the State

49.	Does the business discharge wastewater into surface water (via run-off, storm drains, rivers, creeks, dry water ways, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
50.	If Yes, does the business have a Texas Pollutant Discharge Elimination System (TPDES) or a National Pollutant Discharge Elimination System (NPDES) permit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
51.	Does the business dispose of wastewater adjacent to surface water (by irrigation, evaporation pond, subsurface injection, or another approved method)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
52.	If Yes, does the business have a Texas Land Application permit? [Note: If hazardous or class I industrial waste is being disposed of then multiple other regulations apply]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discharges to On-Site Sewage Facilities

53.	Does the business discharge any process wastewater to a septic system? [Note: On-site septic systems can only be used for domestic sewage]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Storm Water Discharges

54.	Metal Finishers are included in the "light industry" category for storm water permits: Does the business protect raw materials, products, waste, machinery, and storage/loading/unloading/transportation of these materials from storm water exposure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
55.	If these items/operations are NOT protected from storm water exposure, 1. has the business submitted a Notice of Intent (NOI) to EPA [to apply for coverage under the Industrial Multi-Sector General Permit (MSGP)], or applied for an individual storm water permit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | YES | NO | N/A |
|---|--------------------------|--------------------------|--------------------------|
| 2. Has the business developed and implemented a Storm Water Pollution Prevention Plan (SWP3) in accordance with the requirements in the MSGP for their industry sector? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Does the business adhere to the SWP3 requirements outlined in the MSGP for their industry sector? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Does the business follow the monitoring/reporting requirements outlined in the MSGP for their industry sector? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Other Requirements

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| 56. If the business uses more than 25,000lbs. (~55 drums) of cleaning chemicals in a year, and has more than 10 full-time employees, does the business report under the Toxic Release Inventory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 57. Does the business comply with Texas Department of Health requirements of Tier II (Two)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 58. Is the business subject to the Waste Reduction Policy Act (WRPA)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 59. If Yes: Has a Source Reduction Waste Minimization Plan (SR/WM) been developed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 60. If Yes: Has an executive summary been submitted to the TNRCC? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 61. Does the business have Material Safety Data Sheets or other information sheets for all chemicals used in the past 24 months? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 62. Is there any evidence of spills? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 63. If Yes: Has the business taken appropriate reporting and abatement actions? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 64. Is there any evidence of nuisance odor or dust? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Pollution Prevention

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| 65. Does the business recirculate rinse water from cleanest to dirtiest tanks (often called triple cascade rinsing or countercurrent rinsing)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 66. Has the business switched from using petroleum-based/high VOC to aqueous-based/low VOC solvents? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 67. Does the business recycle its solvents? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 68. Does the business use drain boards between tanks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 69. Are drainboards between the plating baths angled to drain dragout back to the previous bath? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 70. Is there a regular inspection and maintenance program in place? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 71. Does the business use rinse water to make-up the plating baths?
(May require using purified water for the rinse.) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 72. Are conductivity meters used to determine when rinses and baths should be changed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 73. Does the business fill or drain containers only in an area that has a secondary containment system capable of containing the contents of the containers being filled or drained? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

		YES	NO	N/A
74.	Are hazardous waste drums inspected for indications that the drum is under pressure - such as swelling and bulging-which may result in a leak or rupture?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
75.	Does the business store cleaning rags in a covered bin and send them to a professional cleaning service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
76.	Does the business store drums on pallets to prevent concrete "sweating" that can cause corrosion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments³

³**This checklist is for guidance purposes only. It is not a substitute for the rules and regulations.**

The Small Business Assistance Program (SBAP) is an independent division, separate from enforcement, of the Texas Natural Resource Conservation Commission (TNRCC). Contact the SBAP on our toll-free hotline (800) 447-2827 or on the internet at http://www.tnrcc.state.tx.us/exec/small_business.

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