



## Small Business & Local Government Assistance Wood Products Manufacturing 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](#).

<b>Company Information</b>		___ 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 a checkmark (✓). Answering “no” to a question with a checkmark 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? Y\* / N  
\*If yes, explain the changes and include the date of changes in the comments.

<b>Air Regulations</b> – Authorizations can be obtained in one of three ways:				
<ul style="list-style-type: none"> <li>• Permit by Rule (PBR)</li> <li>• Standard Permit</li> <li>• New Source Review (NSR) Permit</li> </ul>				
		<b>Yes</b>	<b>No</b>	<b>N/A</b>
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"/> 106.223 – Saw Mills			
	✓ <input type="checkbox"/> 106.231 – Manufacturing, Refinishing and Restoring Wood Products			
	✓ <input type="checkbox"/> 106.265 – Handheld and Manually Operated Machines			
	✓ <input type="checkbox"/> 106.433 – Surface Coating Facilities			
	✓ <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)?			
<b>Air Regulations</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
8✓	Is the facility currently registered under the standard permit for sawmills in accordance with 30 TAC 116.611? If yes, answer questions 9 – 19 below.			
9✓	Does the facility operate only from one hour before sunrise to one hour after sunset? (Drying operations naturally by air or using natural gas, LPG, electricity, and infrared radiation may be conducted 24 hours per day.)			
10✓	Does the sawmill operator(s) take steps to prevent and to extinguish accidental fires or fires resulting from spontaneous combustion, as required by the standard permit?			
11✓	Does all the production equipment at the sawmill (including debarkers, saws, planers, conveyors, stockpiles, dryers, and boilers) meet the minimum distance requirement of 150 feet from the sawmill property line and the setback distance requirements based on hardwood production? (Graph of hardwood production vs. setback distance provided in the standard permit.)			
12✓	Are all in-plant roads, truck loading and unloading areas, parking areas, and other traffic areas sprinkled with water, treated with effective dust suppressants, covered, or paved with a cohesive, hard surface or cleaned as necessary to maintain compliance with all TCEQ rules and regulations?			
13✓	Does the facility maintain records of annual throughput of hardwood and softwood lumber (converted to board-feet) and records of fuel use, including any hours firing fuel oil or fuel oil purchases at the site, for a rolling 24-month period?			
14✓	Are all sawmill residues (sawdust, shavings, or bark) watered, removed, or stored as necessary to minimize fugitive particulate emissions?			
15✓	Are all sawmill residue loading (with a front end loader or similar heavy equipment) work areas sprinkled with water, treated with effective dust suppressants, covered, or paved with a cohesive, hard surface and cleaned as necessary to maintain compliance with all TCEQ rules and regulations?			
16✓	Are all sawmill residues conveyed by belts or drag chains to a collection area for disposal? (If a pneumatic collection system is used, the air must exhaust to a control device meeting the requirements in the standard permit.)			
17✓	Have there been any visible emission events from the site or equipment lasting longer than 30 seconds during a 6-minute period? (Methods and definitions provided in the standard permit.)			

18✓	Have all boilers and drying ovens met the conditions of operation outlined in the standard permit?			
19✓	Have the annual operating hours for all internal combustion engines and electric generator sets (used only for portable, emergency or standby services at the facility) not exceeded 10 percent of the normal annual operating schedule of the primary equipment?			

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

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

Air Regulations (Chapter 101)		Yes	No	N/A
20✓	Does the facility track all reportable and non-reportable emission events and report them to TCEQ by March. 31 of each year? (101.201)			
21✓	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)			
22✓	Are all records maintained for a minimum of 5 years?			

#### 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 Jefferson	Collin Denton Dallas Ellis Johnson	Kaufman Parker Rockwall Tarrant	Brazoria Chambers Fort Bend Galveston	Harris Liberty Montgomery Waller	El Paso	Gregg Nueces Victoria

Air Regulations (Federal and 30 TAC 111, 113, 115, 117 Requirements)		Yes	No	N/A
23✓	If the facility is a source of hazardous air pollutants (HAPs), do they comply with any application National Emission Standards for Hazardous Air Pollutants (NESHAP)? <a href="http://epa.gov/ttn/atw/mactfnlalph.html">http://epa.gov/ttn/atw/mactfnlalph.html</a>			

24✓	Does the facility comply with any applicable 30 TAC 111 requirements? (Control of Air Pollutants from Visible Emissions and Particulate Matter)			
25✓	Does the facility comply with any applicable 30 TAC 113 requirements? (Standards of Performance for HAPs)			
26✓	Does the facility comply with any applicable 30 TAC 115 requirements? (Control of Air Pollutants from Volatile Organic Compounds)			
27✓	Does the facility comply with any applicable 30 TAC 117 requirements? (Control of Air Pollutants from Nitrogen Compounds)			

<b>Air Regulations (30 TAC 115 Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
28✓	Does the facility have daily usage records to demonstrate that it emits less than 3lbs/hr VOC and less than 15lbs/24hrs? (If you meet this minimum requirement, you are exempt from 115.421(a) and 115.423(a))			
29	Is the VOC content of coatings as applied (lbs. of VOC/gal of coating minus water and exempt solvents) below the following VOC limits? <b>NOTE:</b> The limits are for each product “as applied”. That means if the facility mixes part A and part B, then the mixed result (“as applied”) must meet the limit.			
	a. ✓ Clear topcoats VOC	5.9lbs/gal		
	b. ✓ Wash coats	6.5lbs/gal VOC		
	c. ✓ Final repair coat	6.0lbs/gal VOC		
	d. ✓ Semi-transparent wiping and glazing stains	6.6lbs/gal VOC		
	e. ✓ Semi-transparent spray stains and toners	6.9lbs/gal VOC		
	f. ✓ Opaque ground coats and enamels VOC	5.5lbs/gal		
	g. ✓ Clear sealers	6.2lbs/gal VOC		
	h. ✓ Clear shellac	5.4lbs/gal VOC		
	i. ✓ Opaque shellac VOC	5.0lbs/gal		
	j. ✓ Varnish VOC	5.0lbs/gal		
	k. ✓ All other coatings	7.0lbs/gal VOC		
30✓	Does the facility direct solvents from cleaning into closed containers that prevent evaporation into the atmosphere? (If yes, these emissions do not count toward emission rates.)			
31✓	Is a MSDS or other product information that provides VOC content, composition, solids content, solvent density, and other relevant information available for each coating/solvent?			
32✓	Are all required records available and maintained for at least 2 years?			

<b>Air Regulations (Federal Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>Wood Manufacturing</b>				
33✓	Do any of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for wood manufacturing operations apply to this facility?			
34	a. ✓ Does the facility demonstrate compliance with applicable emission limits?			
	b. ✓ Has the facility submitted an Initial Notification to the TCEQ and EPA?			
	c. ✓ Has the facility prepared a work practice implementation plan?			
	d. ✓ Does the facility adhere to the work practice implementation plan?			
	e. ✓ Does the facility comply with monitoring, recordkeeping and reporting requirements?			
<b>Wood Preserving</b>				
35✓	Does the facility conduct wood preserving operations?			
36✓	Is the facility subject to 40 CFR 63 Subpart QQQQQQ: National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources?			
37✓	If yes:			
	a. Has the facility submitted an Initial Notification by the required date?			
	b. Has the facility submitted the Notification of Compliance Status?			
	c. Is the facility compliant with all the record-keeping, reporting requirements and standards in the rule?			
<b>Paint Stripping</b>				
38	Is the facility subject to 40 CFR Part 63, Subpart HHHHHH National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources? If yes, answer questions 39-43. <a href="http://epa.gov/ttn/atw/mactfnlalph.html">http://epa.gov/ttn/atw/mactfnlalph.html</a>			
39✓	If the facility is an existing source as defined in 40 Code of Federal Regulation (CFR) § 63.11171(e), has the owner or operator submitted the "Initial Notification and Compliance Certification" (Form TCEQ-20454)?			
40✓	If the facility is a new source as defined in 40 Code of Federal Regulation (CFR) § 63.11171(e), has the owner or operator submitted the "Initial Notification and Compliance Certification" (Form TCEQ-20453)?			
41	Is the facility in compliance with the requirements of 40 CFR Part 63, Subpart HHHHHH National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources?			
42	Has the facility kept adequate records to demonstrate compliance?			
43	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>Waste Regulations (General Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
44✓	Has the facility performed a hazardous waste determination on all solid waste streams?			
45✓	Does the facility maintain documentation to support all hazardous waste determinations?			
46✓	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)			

47✓	Does the facility have records of monthly waste generation to support its claimed generator status? Indicate the generator status claimed.			
	<p><u>Generator Status</u> <span style="float: right;"><u>Accumulation</u></span></p> <p><u>Time/Accumulation Quantity</u></p> <p><input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) up to 220lbs.....No limit/2,200 lbs or less</p> <p><input type="checkbox"/> Small Quantity Generator (SQG) 220lbs to 2,200 lbs.....180 days or less<sup>1</sup>/13,200 lbs or less</p> <p><input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....90 days or less/no limit</p> <p><sup>1</sup> Can be extended to 270 days if the generator must transport waste 200 miles or more.</p>			
48✓	Is this facility registered with the TCEQ as a hazardous waste generator? (not required for CESQG) TCEQ Registration No. _____ EPA ID _____			
49	Is the facility an industrial waste generator?			
50✓	If yes, is all non-hazardous waste classified as Class 1, Class 2, and Class 3?			
51✓	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)			
52✓	Is the facility's Notice of Registration (NOR) up to date, including all waste streams and waste management units? (Not required for CESQG)			
53✓	Has the facility submitted an Annual Waste Summary each year? (Not required for CESQG)			
54✓	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>
55✓	Does the facility comply with appropriate accumulation time requirements?			
56✓	Does the facility comply with appropriate accumulation quantity requirements?			
57	Is hazardous waste accumulated in tanks at the facility?			
58	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))			
59	Is hazardous waste accumulated in container storage areas at the facility?			
60✓	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)			
62	<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?			
63	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?			

64	Is hazardous waste accumulated in satellite accumulation areas at the facility?			
65	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?			
66✓	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)			
67✓	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>
68✓	Does the facility use a TCEQ/EPA registered transporter? (CESQGs may transport their own waste, without a manifest, to an authorized disposal facility)			
69✓	Does the facility use a TCEQ/EPA permitted treatment, storage, disposal (TSD) facility?			
70✓	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.)			
71✓	Does the facility have all applicable copies (generator/transporter/disposal) of manifests for the last 3 years? (SQG and LQG only)			
72✓	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>
73	Does the facility currently manage any of its hazardous waste streams as "universal waste"?			
74✓	If yes: Are the waste streams appropriately classified and eligible for coverage under the universal waste rule?			
75✓	Are all containers holding universal waste properly labeled per 30 TAC 335.261?			
76✓	Are containers kept closed?			
77✓	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?			
78✓	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?			
79✓	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?			
80✓	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>
81	Does the facility discharge process wastewater to the sewer system?			
82	If yes, has the facility obtained permission from the POTW to discharge process wastewater?			
83	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 84.			

84	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>
85	Does the facility discharge wastewater into surface water (via run-off, storm drains, rivers creeks, dry waterways etc)?			
86✓	If yes, does the facility have a Texas Pollutant Discharge Elimination System (TPDES) Permit?			
87	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 – 95.			
88	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?			
<b>For facilities covered under the NEC?</b>				
96✓	Is the facility meeting the requirements of the No Exposure Certification?			

<b>Public Water Supply</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
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
<p>107 Section 313 of EPCRA - Requirements, Annual Toxic Release Inventory (TRI) Reporting - Federal and State</p> <p>If the facility meets all three of the below criteria, in a calendar year, then the facility is required to report on Form R for all toxic chemicals that have exceeded threshold for reporting, all releases and other waste management activities for that toxic chemical.</p>			
<p>a. Did the facility employ more than 10 full-time employees during the year(s) in question? If less than 10 full-time employees were employed during the year in question, the facility should check to see if more than 20,000 hours was worked by all full-time, part-time, and contract employees for the facility. Personnel do not have to be located at the facility itself to be counted.</p>			
<p>b. Does the Business SIC/NAICS code trigger TRI reporting?</p>			
<p>c. During the year in question, did the facility use, on an annual basis, more than the threshold amounts of a toxic chemical? It should be noted that thresholds for reporting of PBT toxic chemicals are significantly lower than for non-PBT's (see 40 C.F.R. §372.28 for PBT thresholds), and the PBT thresholds are not "activity" dependent. Usages should only be tabulated and summed in a single TRI activity, i.e., do not add across activities.</p>			
<p>108 That is:</p> <p>i. Did the facility "manufacture" (covered TRI activity) more than 25,000 pounds of non-PBT (persistent bioaccumulative toxin) toxic chemical, or more than the threshold amount of a PBT toxic chemical?</p>			
<p>ii. Did the facility "process" (covered TRI activity) more than 25,000 pounds of non-PBT (persistent bioaccumulative toxin) toxic chemical, or more than the threshold amount of a PBT toxic chemical?</p>			
<p>iii. Did the facility "otherwise use" (covered TRI activity) more than 10,000 pounds of non-PBT (persistent bioaccumulative toxin) toxic chemical, or more than the threshold amount of a PBT toxic chemical?</p>			
<p>109 Does the facility comply with the Texas Department of State Health Services' requirements for Tier II?</p>			
<p>110 Is the facility subject to the Waste Reduction Policy Act (WRPA)?</p>			
<p>111 If yes:</p> <p>a. ✓ Has a Source Reduction Waste Minimization Plan (SR/WM) been developed? (SQGs, LQGs, and TRI reporters submit once every 5 years)</p>			
<p>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)</p>			

	c. ✓ Has an Annual Progress Report been submitted? (SQGs, LQGs and TRI reporters only)			
112✓	Does the facility have Material Safety Data Sheets (MSDS) or other information for all chemicals used in the past 24 months?			
113	Is there any evidence of spills?			
114✓	If yes, has the facility taken appropriate reporting and abatement actions?			
115✓	Does the facility practice good housekeeping?			

**Comments:**

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