



## Small Business & Local Government Assistance Printers 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 Internet at <[www.sblga.info](http://www.sblga.info)>.

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:				
<ul style="list-style-type: none"> <li>• Permit by Rule (PBR)</li> <li>• Standard Permit</li> <li>• New Source Review (NSR) Permit</li> </ul>				
		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"/> 106.418 – Printing Presses			
	<input checked="" type="checkbox"/> Other/Previous PBR: _____			
	<input checked="" type="checkbox"/> Other/Previous PBR: _____			
	<input checked="" 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)?			

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

	Air Regulations (Federal and 30 TAC 115 Requirements)	Yes	No	N/A
8✓	If the facility is located in Beaumont/Port Arthur, Dallas/Fort Worth, or El Paso, are there usage records to indicate maximum potential to emit VOCs is less than 50 tons per year?			
9✓	If the facility is located in Houston/Galveston, are there usage records to indicate maximum potential to emit VOCs is less than 25 tons per year?			

10✓	If the facility is in Gregg, Nueces, or Victoria County, are there usage records to indicate maximum potential to emit VOCs is less than 100 tons per year?			
<b>If the answer to questions 8, 9, or 10 is yes, question 11 does not apply</b>				
11	a. ✓ Does the facility use low solvent ink that is no more than 25% VOC solvent <u>and</u> at least 75% water/exempt solvents by volume? <b>OR</b>			
	b. ✓ Does the facility use high solids solvent-borne ink that contains at least 60% non-volatile material by volume? <b>OR</b>			
	c. ✓ Does the facility operate a carbon absorber or incinerator to reduce VOC emissions from a capture system by at least 90% by weight? (the capture system must meet the following minimum efficiencies; publication rotogravure – 75%; packaging rotogravure – 65%; flexographic – 60%)			
12✓	Does the facility keep records of product VOC content, product usage, and emission control equipment operations as required?			
<b>For Offset Lithographic Processes in El Paso only:</b>				
13✓	Are the only VOCs in the fountain solution from non-alcohol additives or alcohol substitutes <u>and</u> is the fountain solution's VOC concentration 3% or less by weight? (NOTE: The fountain solution shall not contain any isopropyl alcohol) If the answer is yes, questions 14 – 19 do not apply			
14✓	If a heatset web press is used <u>and</u> alcohol is used in the fountain solution, is the alcohol content more than 5% by volume? (10% if fountain solution is refrigerated to less than 60 degrees F.)			
15✓	If a non-heatset web press is used for newspaper printing, is the fountain solution free of any alcohol?			
16✓	If a non-heatset web press is used for anything other than newspaper <u>and</u> alcohol is used in the fountain solution, is the alcohol content no more than 5% by volume? (10% if the fountain solution is refrigerated to less than 60 degrees F.)			
17✓	If a sheet fed press is used and alcohol is used in the fountain solution, is the alcohol content no more than 10% by volume? (12% if the fountain solution is refrigerated to less than 60 degrees F.)			
18✓	Does the facility use cleaning solutions with a VOC content no greater than 50% by volume (as used)? <b>OR</b> Does the facility use cleaning solutions with a VOC content no greater than 70% by volume (as used) and use a towel handling system that keeps all waste ink, solvents, and clean-up rags in closed containers until removed by a licensed cleaning/disposal service?			
19✓	Are VOC emissions from the press dryer exhaust reduced by 90% by weight? <b>OR</b> Is a maximum dryer exhaust outlet concentration of 20 ppmv maintained?			
<b>Air Regulations (Federal Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
20	Do the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the printing and publishing industry apply to this facility?			
21	If yes, a. ✓ For publications rotogravure and wide-web flexographic operations, are HAP emission 8% or less of total monthly volatile emissions?			
	b. ✓ For product and packaging rotogravure and wide-web flexographic operations, are HAP emissions 5% or less of monthly HAP applications <b>OR</b> 4% or less of mass of materials emissions <b>OR</b> 20% or less of monthly applied solids?			
22✓	If emissions are more than 10 tons per year for a single HAP, or 25 tons per year for any combination of HAPs, does the facility have a federal operating permit (Title V)?			
<b>Air Regulations (Federal and 30 TAC 115 Requirements)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
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)			

**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
28✓	Does the facility track all reportable and non-reportable emission events and report them to TCEQ by March 31 of each year? (101.201)			
29✓	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)			
30✓	Are all records maintained for a minimum of 5 years?			

Waste Regulations (General Requirements)		Yes	No	N/A								
31✓	Has the facility performed a hazardous waste determination on all solid waste streams?											
32✓	Does the facility maintain documentation to support all hazardous waste determinations?											
33✓	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.....	90 days or less/no limit			
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<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.....	90 days or less/no limit											
34✓	Is this facility registered with the TCEQ as a hazardous waste generator? (not required for CESQG) TCEQ Registration No. _____ EPA ID _____											
35	Is the facility an industrial waste generator?											
36✓	If yes, is all non-hazardous waste classified as Class 1, Class 2, and Class 3?											
37✓	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)											
38✓	Is the facility's Notice of Registration (NOR) up to date, including all waste streams and waste management units? (Not required for CESQG)											
39✓	Has the facility submitted an Annual Waste Summary each year? (Not required for CESQG)											
40✓	Does the facility fulfill all other recordkeeping and reporting requirements for its generator status?											

Waste Regulations (On-Site Accumulations Requirements)		Yes	No	N/A
41✓	Does the facility comply with appropriate accumulation time requirements?			
42✓	Does the facility comply with appropriate accumulation quantity requirements?			
43	Is hazardous waste accumulated in tanks at the facility?			
44	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))			
45	Is hazardous waste accumulated in container storage areas at the facility?			
46✓	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)			
47	<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?			
48	Is hazardous waste accumulated in satellite accumulation areas at the facility?			
49	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?			
50✓	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)			
51✓	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>
52✓	Does the facility use a TCEQ/EPA registered transporter? (CESQGs may transport their own waste, without a manifest, to an authorized disposal facility)			
53✓	Does the facility use a TCEQ/EPA permitted treatment, storage, disposal (TSD) facility?			
54✓	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.)			
55✓	Does the facility have copies of manifests (green and white) for the last 3 years? (SQG and LQG only)			
56✓	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>Discharge to Publicly Owned Treatment Works (POTW) (Sanitary Sewer System)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
57	Does the facility discharge process wastewater to the sewer system?			
58	If yes, has the facility obtained permission from the POTW to discharge process wastewater?			
59	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 61.			
60	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>
61	Does the facility discharge wastewater into surface water (via run-off, storm drains, rivers creeks, dry waterways etc)?			
62✓	If yes, does the facility have a Texas Pollutant Discharge Elimination System (TPDES) Permit?			
63	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 68 – 71.			
	h. ✓ Is the facility in compliance with storm water discharge requirements listed in their TPDES wastewater discharge permit?			

64	Does the facility dispose of wastewater adjacent to surface water (by irrigation, evaporation pond, subsurface injection, or another approved method)?			
65✓	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.)			
66✓	<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>
67✓	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>				
68✓	Has the facility developed and implemented a Storm Water Pollution Prevention Plan (SWP3)?			
69✓	Does the facility adhere to the SWP3 requirements outlined in the MSGP?			
70	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>				
71✓	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>
72	Does the facility use a private well to supply drinking water to employees and customers? If no, skip to question 82			
73	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 82			
74	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			
75	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			
76	✓ Is the facility registered with the TCEQ as a PWS			
77	✓ Does the facility have a licensed operator? (non-transient, non-community system only)			
78	✓ Does the facility conduct monthly microbiological testing?			
79	✓ Does the facility conduct chlorine residual testing?			
80	✓ Does the facility conduct other contaminant testing as required for their system? Indicate what contaminants the facility is testing for: _____ _____			
81	✓ Does the facility conduct water pressure testing?			

Other Requirements		Yes	No	N/A
82	Section 313 of EPCRA - Requirements, Annual Toxic Release Inventory (TRI) Reporting - Federal and State  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.			
	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.			
	b. Does the Business SIC/NAICS code trigger TRI reporting?			
	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.			
	That is:			
	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?			
	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?			
	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?			
83	Does the facility comply with the Texas Department of Health's requirements for Tier II?			
84	Is the facility subject to the Waste Reduction Policy Act (WRPA)?			
85	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)			
86✓	Does the facility have Material Safety Data Sheets (MSDS) or other information for all chemicals used in the past 24 months?			
87	Is there any evidence of spills?			
88	If yes, has the facility taken appropriate reporting and abatement actions?			
89	Does the facility practice good housekeeping?			

**Comments:**

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