



City of Dallas
Environmental Management System



**MANAGEMENT OF CHANGE PROCEDURE
CHECKLIST
GUIDANCE FOR IDENTIFICATION OF
LEGAL REQUIREMENTS AND ENVIRONMENTAL ASPECTS
FOR CHANGES**

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THIS CHECKLIST IS FOR THE FOLLOWING TYPICAL CHANGES (ACTIVITIES):

- **RENOVATION/REPAIR OF BUILDINGS**
- **NEW CONSTRUCTION OF BUILDINGS**
- **OPERATIONS**
- **PROCESS**
- **EQUIPMENT**
- **MAINTENANCE ACTIVITIES**
- **PRODUCTS**

AIR ISSUES TO REVIEW

AIR EMISSIONS AUTHORIZATIONS

According to TCEQ rules, any emissions of any pollutant in any amount (no matter how small) from a stationary source require some type of authorization. (Note that emissions from mobile sources are not included here.) Typical levels of authorization include:

- De Minimis Facilities or Sources
- Permits by Rule (PBRs)
- Standard Permit
- New Source Review Permit
- Title V Operating Permit

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Use the following checklist to determine the required levels of authorization for your facility. See Table 1 for more guidance on claiming each of the listed levels of authorization:

- ☐ Do you emit air pollutants from stationary sources from any of your facility operations?
- ☐ If yes, are any of the emissions listed by TCEQ as from De Minimis facilities or sources? Review information on **TABLE 1**.
- ☐ If no, do any of the emissions meet the criteria for claiming a Permit by Rule (PBR)? Review information on **TABLE 1**.
- ☐ If no, do any of the emissions meet the criteria for a Standard Permit? Review information on **TABLE 1**.
- ☐ If no, and if proposed levels of emissions make the source a major source, then you must apply for a New Source Review Permit (which is a permit to construct). Review information on **TABLE 1**.
- ☐ If proposed levels of emissions make the source a major source, then you must apply for a Title V Operating Permit (which is a permit to operate). Review information on **TABLE 1**.

OTHER EMISSIONS:

- ☐ Dust generated?
- ☐ Checked for asbestos?
- ☐ Checked for lead paint?
- ☐ Pesticide/Herbicide/Fertilizer being applied?
- ☐ UST/AST system being installed, serviced or closed?
- ☐ Contains Volatile Organic Compounds (VOCs)?
- ☐ Contains Lead or Mercury?

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WATER ISSUES TO REVIEW

- ___ Are there storm drains, creeks, ponds/lakes, wetlands, or flood plain on the facility?
Review information on **TABLE 1**.

- ___ Is the location of the proposed change (activity), facility, or property line near storm drains, creeks, ponds/lakes, wetlands, or flood plain? Review information on **TABLE 1**.

- ___ Is the location of the proposed change (activity) in a storm drain, creek, pond/lakes, wetland, or flood plain? Review information on **TABLE 1**.

- ___ Is the proposed change (activity) at the facility disturbing an area one acre or larger? Review information on **TABLE 1**.

- ___ Have you checked the City's records to determine if site is on a flood plain?
Review information on **TABLE 1**.

- ___ Will the proposed change (activity) create liquid that could fall onto the ground that is not entirely storm water (i.e. paint washout, concrete washout, dirty water from soil, etc.)? Review information on **TABLE 1**.

- ___ Will the proposed change (activity) create solids that could fall onto the ground (i.e. metal shavings, wood shavings, dust, dirt, trash, etc.)? Review information on **TABLE 1**.

- ___ Will you be creating waste water that will be put down an indoor drain (i.e. sanitary sewer)? Review information on **TABLE 1**.

- ___ Does the facility have a TPDES storm water discharge permit? Review information on **TABLE 1**.

- ___ Is the proposed change (activity) located at the following facilities (TPDES permitted facilities)?:
 - McCommas Bluff Landfill
 - COD Salvage Yard
 - COD Hensley Field Operations Center
 - Deepwood Loop Twelve Site
 - Bachman Water Treatment Plant
 - Aviation Facilities at Love Field Airport and Dallas Executive AirportReview information on **TABLE 1**.

- ___ Does the proposed change (activity) at the facility require an Industrial TPDES storm water discharge permit? Review information on **Table 1**.

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- ___ Is or will there be greater than 1,320 gallons of oil or petroleum stored above ground (drums, tanks, etc.), or greater than 42,000 gallons of oil or petroleum stored underground? Review information on **TABLE 1**.
- ___ Will there be any floor drains installed in the facility? Review information on **TABLE 1**.
- ___ Are pesticides/herbicides/fertilizers to be applied? Review information on **TABLE 1**.
- ___ Are there any wells (monitoring, drinking water, dry, injection, etc.) on the property? Review information on **TABLE 1**.
- ___ Are there any septic tanks being installed at the facility? Review information on **TABLE 1**.
- ___ Are there any oil/water separators being installed at the facility? Review information on **TABLE 1**.
- ___ Are there underground storage tanks or above ground storage tanks at the facility? Review information on **TABLE 1**.
- ___ Will potable water be used? Review information on **TABLE 1**.

WASTE ISSUES TO REVIEW

- ___ Is the waste hazardous? Review information on **TABLE 1**.
- ___ What is the facility's hazardous waste generator status? Review information on **TABLE 1**.
- ___ Used oil/used oil filters stored or generated at the facility? Review information on **TABLE 1**.
- ___ Waste oil tanks and oil/water separators at the facility? Review information on **TABLE 1**.
- ___ Can we dispose the facility's waste at the landfill? Review information on **TABLE 1**.
- ___ What can be recycled? Review information on **TABLE 1**.
- ___ How can we dispose of asbestos containing material? Review information on **TABLE 1**.
- ___ How can we dispose of lead paint? Review information on **TABLE 1**.

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- ___ How can we dispose of oil-based paint and paint containers? Review information on **TABLE 1**.
- ___ How can we dispose of latex paint? Review information on **TABLE 1**.
- ___ How can we dispose of pesticides, herbicides and fertilizer? Review information on **TABLE 1**.
- ___ Can floor drains be installed in waste container areas? Review information on **TABLE 1**.

OTHER ISSUES TO REVIEW

- ___ Hazardous chemicals stored at the facility, greater than 10,000 lbs (i.e. 1,600 gallons or more of gasoline, etc.)?
- ___ Employees informed of all chemicals used at the facility?
- ___ New or change to electric service?
- ___ Change in electric consumption?
- ___ Have all applicable Fire and Building permits?
- ___ Meet all applicable Fire and Building codes?