

Aspect Significance Report

Media	Source	Area Impact	Key Control Point	Requirement
Air	Medical Waste Incinerator	Site	Maintain on an annual basis documentation of the following: 1) Operating procedures specified in 30 TAC 113.2078, Table 9; 2) training of operators specified in 30 TAC 113.2078, Table 10.	Documentation of Operating Procedures and Operator Training
Land	Medical Waste	Local	Management oversight for medical waste collection, treatment, and disposal	Medical Waste Management Program
Air	Medical Waste Incinerator	Site	Contract stack testing firm to conduct stack sampling for PM, CO, HCl, and Opacity (Reference Method 9) on medical waste incinerator to certify compliance with permit emission limits.	Conduct Annual Stack Sampling Compliance Testing
Land	Hazardous Waste	Site	Meet storage and labeling requirements for wastes according to compatibility Maintain inspection records, SOPs, on Chemical Accumulation Facility	Hazardous Waste Program
Land	Hazardous Waste	Site	Work with contractor to prepare manifest and package hazardous waste for shipment	Shipping and Reporting Procedures for Hazardous Waste

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Land	Hazardous Waste	Site	Periodic audit of labs for areas that generate hazardous waste (satellite accumulation rule training)	Laboratory Audits
Air	Emergency Generators	Site	Maintain complete written monthly records of hours of operation of emergency generators. If operation was for emergency situation, records should identify the type of emergency, and start and end times of each emergency situation.	Written Monthly Records of Hours of Operation Maintained
Land	Hazardous Waste	Site	Prepare and implement a five-year pollution prevention plan that shall be updated as necessary. Plans shall be maintained on-site and available to commission personnel for inspection. Prior to expiration of the initial plan and each succeeding five-year p	Waste Reduction Policy Act (WRPA) 1991
Water	Wastewater	Site	Contact City of Galveston requesting Extension, or new pretreatment copper limits	40 CFR 125 30 TAC 308
Land	Radioactive material	Local	Radioactive waste management includes storage, decay, release to sanitary system, transfer, landfill and incineration disposal	Radioactive Waste Management Program
Land	Universal Waste	Site	Meet training, storage, labeling and disposal requirements for universal wastes	Universal waste management program

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Air	Facility	Site	Submit Deviation Report Form to TCEQ. Form must identify all Deviations that occurred within past six months, the applicable permit / regulatory requirement, cause of the deviation, and any corrective action taken to remedy the deviation situation.	Title V Semiannual Deviation Report
Land / Water	Spill Prevention and Control	Site	Annual periodic briefing to highlight oil/fuel pollution prevention for employees working oil/fuel products	SPCC Plan
Land / Water	Spill Prevention and Control	Local	Annually inspect facility to include general SPCC Plan requirements, conformance, and procedures	SPCC Plan
Water	Stormwater	Site	detection and elimination of illicit discharges	40 CFR 402 30 TAC 205
Water	Stormwater	Site	UTMB Stormwater Management Program for Campus:	40 CFR 402 30 TAC 205
Water	Stormwater	Site	UTMB Construction Standard for projects disturbing greater than 1 acre	40 CFR 402 30 TAC 205

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Air	Emergency Generators	Site	Conduct visible emissions observation of Emergency Generators emissions. If visible emissions noted, conduct visible emission opacity evaluation by certified opacity reader.	Visible Emissions Observation
Land	Medical Waste	Site	Recordkeeping Requirements - Owner of Type V Processing Facility	Medical Waste Management Facility
Air	Medical Waste Incinerator	Site	Contract stack testing firm to conduct RATA on medical waste incinerator CEMS.	Relative Accuracy Test Audit (RATA)
Land / Water	Aboveground Storage Tanks	Site	SPCC Plan is in conformance with State Requirements	SPCC Program
Water	Grease Traps	Site	Contact appropriate vendor, and schedule a date/time for them to service the grease traps.	30 TAC 308, 307
Land / Water	Spill Prevention and Control	Local	Plan must be reviewed and certified by a registered professional engineer every 5-years. Signature requirement from UTMB Leadership.	SPCC Plan

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Water	Grease Traps	Site	Contact appropriate vendor, and schedule a date/time for them to service the grease traps.	30 TAC 308, 307
Land / Water	Underground Storage Tanks	Site	SPCC Plan is in conformance with State Requirements	SPCC Program
Land / Water	Underground Storage Tanks	Site	SPCC Plan is in conformance with State Requirements	SPCC Program
Water	Stormwater	Site	public education and outreach and public involvement or participation	40 CFR 402 30 TAC 205
Air	Autoclave	Site	Conduct visible emissions observation of Autoclave emissions. If visible emissions noted, conduct visible emission opacity evaluation by certified opacity reader.	Visible Emissions Observation
Land	Hazardous Waste	Site	Prepare and submit annual Hazardous Waste Summary to TCEQ from previous calendar year. Due March 1.	Industrial & Hazardous Waste Annual Waste Summary

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Air	Medical Waste Incinerator	Site	Conduct visible emissions observation of Medical Waste Incinerator stack. If visible emissions noted, conduct visible emission opacity evaluation by certified opacity reader.	Visible Emissions Observation
Air	Facility	Site	Determine number of allowances required above those available in UTMB account (if any) in order to account for all NOX emissions from previous calendar year. Allowances must be obtained by March 1.	Obtain Necessary Mass Emission Cap and Trade (MECT) NOX Allowances to Meet Compliance for Preceding Calendar Year
Land / Water	Underground Storage Tanks	Site	Annual Registration & Delivery Certificate for USTs	SPCC Program
Water	Stormwater	Site	pollution prevention and "good housekeeping" measures for municipal operations	40 CFR 402 30 TAC 205
Water	Wastewater	Site	Prepare wastewater permit renewals for the four UTMB Permit Locations, preparations includes sampling for the required parameters listed in the current permits	40 CFR 125 30 TAC 308
Land	Hazmat Security Plan	Regional	Security plan for shipments of hazardous materials - if security incident occurs report is required	Hazardous Material Security Plan

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Land / Water	Underground Storage Tanks	Site	Annual Stage II Exemption Report for Gasoline UST	SPCC Program
Air	Thomas J. Lipton Boilers	Site	Conduct visible emissions observation of Thomas J. Lipton Boilers stacks. If visible emissions noted, conduct visible emission opacity evaluation by certified opacity reader.	Visible Emissions Observation
Air	Main Plant Boilers	Site	Conduct visible emissions observation of Main Plant Boilers stacks. If visible emissions noted, conduct visible emission opacity evaluation by certified opacity reader.	Visible Emissions Observation
Air	Rebecca Sealy Boilers	Site	Conduct visible emissions observation of Rebecca Sealy Boilers stacks. If visible emissions noted, conduct visible emission opacity evaluation by certified opacity reader.	Visible Emissions Observation
Air	Medical Waste Incinerator	Site	Contract stack testing firm to conduct CGA on medical waste incinerator CEMS.	Quarterly Cylinder Gas Audit (CGA)
Land	Radioactive material	Site	If generator has not rec'd the top signed copy of the manifest back in 35 days, must contact the TSDF. After 45 days, must notify TCEQ	Mixed Waste management program

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Air	Main Plant Boilers	Site	Contract stack testing firm to conduct CGA on boilers CEMS.	Quarterly Cylinder Gas Audit (CGA)
Land	Hazardous Waste	Site	Annual training required for employees managing hazardous waste	Training
Land	Hazmat Security Plan	Site	Hazmat Security Plan training	Hazardous Material Security Plan
Land	Medical Waste	Site	MSW Permit # 2232 Annual Report	Municipal Solid Waster Permit
Land	Hazardous Waste	Site	Review and prepare a progress report addressing source reduction activities and waste minimization activities from previous calendar year. Due July 1st.	Waste Reduction Policy Act (WRPA) 1991 P2 Annual Progress Report
Air	Facility	Site	EPM staff shall utilize Air Regulatory Compliance Matrix to review applicable ongoing facility activities to ensure compliance with all Title V / permit / regulatory compliance requirements.	Quarterly Compliance Status Audit - WCM Air Regulatory Compliance Matrix

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Air	Main Plant Boilers	Site	Maintain quarterly (and within 24 hours of any fuel oil change) fuel oil purchase records in order to demonstrate that only fuel oil <0.8% sulfur is fired in boilers.	Boiler Fuel Oil Purchase Records Maintained
Air	Facility	Site	Prepare and submit annual Emission Inventory Questionnaire (EIQ) to TCEQ	Annual Emission Inventory Questionnaire for Preceding Calendar Year
Water	Grease Traps	Site	Contact appropriate vendor, and schedule a date/time for them to service the grease traps.	30 TAC 308, 307
Water	Grease Traps	Site	Review contract contract bid documents, make nessassary changes to reflect Ordinance No. 02-008.	30 TAC 308, 307
Land	Hazardous Materials	Site	Emergency plans and procedures for Chemical Accumulation Facility	Hazardous Chemical Reporting
Land	PCBs	Site	Reporting	Hazardous Waste Management Program

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Water	Wastewater	Site	Contact Wingo Services @ (281)367-9990	40 CFR 125 30 TAC 308
Water	Wastewater	Site	Select lab to run analysis on specific self monitoring requirements	40 CFR 125 30 TAC 308
Land / Water	Spill Prevention and Control	Site	Annual training required for employees working oil/fuel products	SPCC Plan
Air	Facility	Site	EPM staff shall utilize Air Regulatory Compliance Matrix to review applicable ongoing facility activities to ensure compliance with all Title V / permit / regulatory compliance requirements.	Annual Compliance Status Audit - WCM Air Regulatory Compliance Matrix
Land / Water	Spill Prevention and Control	Site	Notification requirements for reportable quantities release	SPCC Plan
Land	Hazardous Waste	Site	Review and correct as necessary, submit any changes to the TCEQ. Due March 1.	Administrative changes to the Notice of Registration (NOR)

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Air	Facility	Site	Submit Title V Operating Permit renewal application to TCEQ. Permit expires May 2, 2010 and renewal application must be submitted 6 months prior to expiration.	Title V Operating Permit Renewal
Air	Gasoline Tank / Gasoline Fuel Dispensing Area	Site	Submit to TCEQ the facility's monthly gasoline throughput for the preceding calendar year, in order to maintain exempt status from the emissions, control, inspection, testing, and recordkeeping requirements of Motor Vehicle Dispensing Facilities under 30	Submit Facility's Monthly Gasoline Throughput for Calendar Year
Air	Facility	Site	Prepare and submit annual Air Emissions / Inspection Fees Basis Form to TCEQ. Form must be submitted within 60 days of date on cover letter from TCEQ under which form received.	Annual Air Emissions / Inspection Fees Basis Form
Air	Facility	Site	Submit Form PCC to TCEQ. Form must identify all Deviations that occurred within past year, and certify compliance with all other regulatory and permit requirements.	Title V Annual Compliance Certification
Air	Medical Waste Incinerator	Site	Submit permit renewal application to TCEQ. Permit expires December 16, 2013 and renewal application must be submitted 90 days prior to expiration.	New Source Review Permit No. 18655 Renewal
Air	Facility	Site	Facility personnel responsible for visible emission observations and opacity readings must be trained every 180 days (6 months).	Training of Certified Opacity Readers

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Land	Hazardous Waste	Site	If generator has not rec'd the top signed copy of the manifest back in 35 days, must contact the TSDF. After 45 days, must notify TCEQ	Exception Reporting
Air	Main Plant Boilers	Site	Submit permit renewal application to TCEQ. Permit expires May 20, 2014 and renewal application must be submitted 90 days prior to expiration.	New Source Review Permit No. 56653 Renewal
Land	Hazardous Waste	Site	Lipton Tea (Print Shop) is conditionally exempt small quantity generator	Hazardous Waste Exemption
Air	Crematory	Site	Conduct visible emissions observation of Crematory stack. If visible emissions noted, conduct visible emission opacity evaluation by certified opacity reader.	Visible Emissions Observation