

Date of Audit	Media of NC (air, waste, lockout tagout, HAZCOM, etc.)	Regulatory Citation that NC is attributed to	Description of Non Conformance	Description of Corrective Action
Week of March 3, 2014	SPCC	40 CFR 112.7	No documented annual personnel training rosters from 2012 until 2014	SPCC plan was updated to reflect process changes at the site in 2014. Training was completed on the required individuals for temporary test. Training will be completed the week of March 17, 2014. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	SPCC	40 CFR 112.7	No documented monthly inspection forms for oil storage vessels and oil-filled equipment from 2012 until 2014	Inspections will begin in March 2014. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	SPCC	40 CFR 112.7	No documented quarterly inspection forms for aboveground valves, pipe supports, pipes, and pipelines	Inspections will begin in March 2014. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	SPCC	40 CFR 112.7	No Warning Sign "Warning Oil Transfer Operations. Avoid Tanks and Pipes"	Temporary sign in place, permanent sign needs to be ordered
Week of March 3, 2014	Air Permit	30 TAC 106.4	Records to be maintained at the site for the most recent 24 months of operation and be made immediately available to the commission or any pollution control agency with jurisdiction	Waiting to hear back from consultant that completed permit to understand what records are missing
Week of March 3, 2014	Air Permit	30 TAC 106.4	MSDS for all coating materials and solvents	New paints have been added and waiting to receive MSDS
Week of March 3, 2014	Air Permit	30 TAC 106.4	Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation (Missing records from Jan 2011 - 2014)	Create a daily management log that operator will fill out. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Air Permit	30 TAC 106.4	Maintain records of actual hours of operation of each coating and stripping operation (Missing records from Jan 2011 - 2014)	Create a daily management log that operator will fill out. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Air Permit	30 TAC 106.4	Maintain monthly report that shows the total hours of operation for each day that you operate your surface coating operations (Missing records from Jan 2011 - 2014)	Monthly report will be created using the operator daily management information. Develop site policy to cover requirements and include in site compliance calendar

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Week of March 3, 2014	Air Permit	30 TAC 106.4	Maintain a monthly report that shows the record of your emissions in pounds per hour for each day of your coating operation (Missing records from Jan 2011 - 2014)	Monthly report will be created using the operator daily management information. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Air Permit	30 TAC 106.4	Maintain monthly report that shows the emissions in pounds per day for each day of your coating operations (Missing records from Jan 2011 - 2014)	Monthly report will be created using the operator daily management information. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Air Permit	30 TAC 106.4	Maintain a monthly report that shows the emissions in pounds per week from your coating operations (Missing records from Jan 2011 - 2014)	Monthly report will be created using the operator daily management information. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Air Permit	30 TAC 106.4	Maintain a report that shows the emissions during the previous 12 calendar months in tons per year (Missing records from Jan 2011 - 2014)	Monthly report will be created using the operator daily management information. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Air Permit	30 TAC 106.4	Maintain a monthly report that shows examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions, used to estimate your emissions (Missing records from Jan 2011 - 2014)	Monthly report will be created using the operator daily management information. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Tier II Emergency and Hazardous Chemical Inventory	42 U.S.C 11022	Determine quantities for Hazardous Materials chemical inventory. If site has reportable quantities for 2011, 2012 or 2013 it is past due in reporting	Reviewing sites MSDS and quantities on site. Create site policy and add to compliance calendar if quantities are met
Week of March 3, 2014	Special Waste Generator Permit	City of Houston Department of Health and Human Services	Clean/pump out oil/water separator at least once every 90 days and keep manifest for 5 years. Only allowed to use The city of Houston approved "List of Permitted Service Companies by company name"	Clean out was completed on January 29, 2014. Oil/water separator had only been cleaned out once prior and the company was not permitted by the City of Houston. Included on sites compliance calendar. Develop site policy
Week of March 3, 2014	Special Waste Generator Permit	City of Houston Department of Health and Human Services	Maintain Solid/Special Waste Manifest for 5 years	Manifest has been collected starting on January 29, 2014. Missing records from 2011 until Jan 2014. Develop site policy to cover requirements and include in site compliance calendar

Week of March 3, 2014	Special Waste Generator Permit	City of Houston Department of Health and Human Services	Holding tank shall be fully evacuated, cleaned, inspected and if needed repaired or otherwise maintained	Will be included in oil/water separator clean out. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	Universal Waste	40 CFR 273	Viox Services has been transporting used batteries and light bulbs and disposing at another sites location	Site has used battery containers for disposal and will be ordering light bulb containers. Develop site policy to cover requirements and include in site compliance calendar
Week of March 3, 2014	OSHA Recordkeeping Regulation	29 CFR Part 1904	No documented 2011 OSHA 300 Form	Completed log and signed with date of 2/28/2014. Include in sites compliance calendar
Week of March 3, 2014	Confined Space	29 CFR 1910.146	Evaluate and label confined space locations	Need to evaluate and label.

<b>BU CAR Tracker Scorecard</b>	<b>EBU</b>	<b>PGBU</b>	<b>CF</b>	<b>ESBU</b>	<b>FSBU</b>	<b>CTT</b>	<b>DBU</b>
<b>No of Non Compliances Raised (Critical)</b>							
<b>No of Non Compliances Raised (Major)</b>							
<b>No Closed On/Before Due Date</b>							
<b>No Past Due</b>							
<b>Total No Raised</b>							
<b>% On Time Closure Rate (no closed before due date /total number raised *100</b>							

**Overall**