



Hot Mix Asphalt Plants Compliance Audit

Materials, Fuels, and Additives Allowed

Environmental Audits

Minnesota Pollution Control Agency (MPCA) compliance audit checklists are designed to assist businesses and MPCA staff with the interpretation of Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to all your compliance obligations. If you have questions about the checklist, your obligations, or its conditions that you discover as you complete this evaluation, please contact:

Small Business Environmental Assistance Program (SBEAP)

651-282-6143 or 1-800-657-3938

<http://www.pca.state.mn.us/programs/sbap-sectors.html>

Date of Audit: _____

Company Name: _____

Authorized
Representative Name: _____ Title: _____

Hot mix asphalt (HMA) materials, fuels, and additives allowed:

The owner or operator of a hot mix asphalt (HMA) plant is allowed to use only the materials, fuels, and additives designated below unless specifically disallowed in a part 70, state, or general permit.

List of authorized materials, fuels, and additives

A. The designated materials are: clay, silt, sand, gravel, and crushed stone produced from naturally occurring geologic formations, without additives; recycled asphalt pavement; portland cement concrete; recycled sediments from asphalt plant scrubber operations; fines from asphalt plant fabric filter operations; asphalt cement; and hydrated lime.

1. Does your asphalt plant use one or more of the approved materials described above?

- ☐ **YES** Our HMA plant uses one or more of the approved materials described above. Continue on to the next question.
- ☐ **NO** Although our HMA plant does use one or more of the approved materials described above, we also use materials not approved in the above materials description. This is a deviation and must be reported on the DRF-2 form. Continue on to the next question.

B. The designated fuels for combustion are: natural gas, methane, butane, and propane; gasoline, kerosene, diesel fuel, jet fuel, and fuel oils (No. 1, No. 2, No. 3, No. 4, No. 5, No. 6); on-specification used oil provided that total halogens shall not exceed 1,000 parts per million; and virgin oil that is discarded before use and that otherwise meets the requirements of this item for on-specification used oil.

2. Does your asphalt plant use for combustion one or more of the approved fuels described above?

- ☐ **YES** Our HMA plant does use for combustion one or more of the approved fuels described above. Continue on to the next question.
- ☐ **YES** Our HMA plant does use for combustion "used oil" as described above. However, the used oil does not meet the halogen and/or sulfur content requirements (see the ambient modeling check list for more details). *This is a deviation and must be reported on the DRF-2 form.* Continue on to the next question.
- ☐ **YES** Our HMA plant is currently burning waste oil with a sulfur content of < (less than) 0.7 percent sulfur. Continue on to the next question.
- ☐ **YES** Our HMA plant waste oil content is > (greater than) 0.7 percent sulfur and a SCREEN3 dispersion model was completed (results are available upon request). Continue on to the next question.
- ☐ **NO** Based on fuel sulfur content, our HMA plant needs to complete a SCREEN3 Model to determine ambient SO₂ emissions. *This is a deviation and must be reported on the DRF-2 form.* Continue on to the next question.

C. **The designated additives are:** silicone, organic soaps, and other substances of a similar nature added to the asphalt cement.

3. **Do you use one or more of the designated additives described above?**

- ☐ **YES** Our asphalt plant uses one or more of the approved additives as described above. Continue on to the next question.
- ☐ **NO** Although our asphalt plant does use one or more of the approved additives described above, we also use other additives not approved in the above description. This is a deviation and must be reported on the DRF-2 form. Continue on to the next question.

D. **Procedure for approval of additional materials, fuels, and additives.** The owner or operator may use materials, fuels, or additives not listed above, if: the use is specifically allowed by a part 70, state, or general permit; or for HMA plants with a registration permit, the MPCA has provided written approval of the use prior to its incorporation into asphalt or use as a fuel.

4. **Did you receive written approval from the MPCA for the use of any materials, fuels, or additives not listed above prior to its incorporation into the asphalt or use as a fuel?**

- ☐ **YES** We did receive written approval from the MPCA for the use of any materials, fuels, or additives not listed above. Continue on to the next question.
- ☐ **NO** We did not receive written approval from the MPCA for the use of any materials, fuels, or additives not listed above. This is a deviation and must be reported on the DRF-2 form. Continue on to the next question.

NOTE: Requests for approval must be received by the commissioner at least 60 days before the materials, fuels, or additives are used. The owner or operator must conduct performance testing under parts 7017.2001 to 7017.2060 to determine actual emission rates from the use of the material, fuel, or additive. The actual emission rates shall be used to determine actual emissions for HMA plants that hold option D registration permits.

E. **Records required.** The owner or operator must keep records of the materials, fuels, and additives used and the amount used on a calendar year basis. The owner or operator must maintain the records required under this subpart for a minimum of five years from the date the record was made.

5. **Do you keep and maintain records of the materials, fuels, and additives used and the amount used on a calendar year basis and for five continuous years?**

- ☐ **YES** We do keep and maintain records of the materials, fuels, and additives used and the amount used on a calendar year basis and for five continuous years. This checklist is complete.
- ☐ **NO** We do not keep and maintain records of the materials, fuels, and additives used and the amount used on a calendar year basis and for five continuous years. This is a deviation and must be reported on the DRF-2 form. This checklist is complete.