



**Minnesota Pollution
Control Agency**

520 Lafayette Road
St. Paul, MN 55155-4194

Hot Mix Asphalt Plants Compliance Audit

Pollution Control Equipment Requirements

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) Plants Subject to Minn. R. 7011.0915 entitled, "Asphalt Plant Control Equipment Requirements."

Operation of asphalt plant control equipment

The owner or operator of a HMA plant needs to operate in compliance all plant pollution control equipment whenever operating the HMA plant. Unless specifically allowed by a part 70, state, or general permit, each piece of asphalt plant control equipment shall at all times be operated such that the monitoring parameters are in the range established by the control equipment manufacturer's specifications, or within the operating parameters established by the commissioner as the result of the most recent performance test conducted.

- ☐ **YES** We do operate our control equipment in accordance with the manufacturer's specification or the most recent performance test.
- ☐ **NO** We do not operate our control equipment in accordance with the manufacturer's specification or the most recent performance test. *This is a deviation and must be reported on the DRF-2 form.*

Control Equipment Alternative Range

The owner or operator applying for a registration permit or capped permit may request an *alternative range* to the control equipment manufacturer's specifications, if the proposed range is based on two previous years of compliant monitoring data supplied with the request. For HMA plants applying for a registration permit in operation on April 22, 1996, this request shall be made by the application deadline listed in part 7007.0350, subpart 1, item A. The proposed operating range shall be deemed acceptable unless notified otherwise in writing within 30 days of receipt by the commissioner.

- ☐ **YES** We do operate our HMA plant control equipment in an *alternative range* to the control equipment manufacturer's specifications based on two previous years of compliant monitoring data.
- ☐ **NO** We do not operate our HMA plant in an *alternative range* to the control equipment manufacturer's specifications based on two previous years of compliant monitoring data.

- A. An owner or operator** who has failed to disclose fully all facts relevant to the proposed monitoring parameter range of the asphalt plant control device has knowingly submitted false or misleading information to the MPCA.
- ☐ **YES** We have disclosed all facts relevant to the proposed monitoring parameter range of our plant control device.
- ☐ **NO** We have not disclosed all facts relevant to the proposed monitoring parameter range of our plant control device, or we have knowingly submitted false or misleading information to the MPCA. *This is a deviation and must be reported on the DRF-2 form.*
- B. Operation of the control device** in the monitoring parameter range proposed by the owner or operator would endanger human health or the environment, or subject the HMA plant to different applicable requirements or requirements under chapter 7007.
- C. The proposed range** is not supported by the data supplied with the request.
- ☐ **YES** We are currently operating the HMA plant control device in the monitoring parameter range proposed by the owner or operator and we are not endangering human health or the environment.
- ☐ **NO** We are not currently operating the baghouse control device in the monitoring parameter range proposed by the owner or operator and could be endangering human health or the environment. *This is a deviation and must be reported on the DRF-2 form.*

Maintenance of asphalt plant control equipment

The owner or operator of a HMA plant must maintain each piece of asphalt plant control equipment as designed to ensure compliance with applicable requirements, comply with source-specific maintenance requirements specified in a part 70, state, or general permit, and must perform the following on each piece of asphalt plant control equipment unless otherwise specified in a part 70, state, or general permit:

- ☐ **YES** We continue to maintain each piece of our HMA plant control equipment as designed to ensure compliance with applicable requirements and do comply with source-specific maintenance requirements specified in a part 70, state, or the general permit.
- ☐ **NO** We do not continue to maintain each piece of our HMA plant control equipment as designed to ensure compliance with applicable requirements and do not comply with source-specific maintenance requirements specified in a part 70, state, or the general permit. *This is a deviation and must be reported on the DRF-2 form.*
- A. Thoroughly inspect** all asphalt plant control equipment, including structural components, annually.
- ☐ **YES** We do inspect our asphalt plant control equipment in accordance with part 70, state, or general permit *annually*.
- ☐ **NO** We do not inspect our asphalt plant control equipment annually. This is a deviation and must be reported on the DRF-2 form.
- B. Inspect** ducts, connections, and housings for leaks monthly;
- ☐ **YES** We do inspect our asphalt plant control equipment inspect ducts, connections, and housings for leaks *monthly*
- ☐ **NO** We do not inspect our asphalt plant control equipment ducts, connections, and housings for leaks *monthly*. *This is a deviation and must be reported on the DRF-2 form.*
- C. Check monitoring equipment daily** to ensure it is operating in the range required by for example: pressure gauges, temperature indicators, flow gauges, and recorders.
- ☐ **YES** We do check our asphalt plant control equipment daily to ensure it is operating in the range required.
- ☐ **NO** We do not check our asphalt plant control equipment daily to ensure it is operating in the range required. *This is a deviation and must be reported on the DRF-2 form.*
- D. Calibrate** all monitoring equipment annually;
- ☐ **YES** We do calibrate all monitoring equipment *annually*.
- ☐ **NO** We do not calibrate all monitoring equipment *annually*. This is a deviation and must be reported on the DRF-2 form.
- E. Fabric filter control devices:** check exterior cleaning system equipment and its operation daily; and check interior cleaning equipment and its operation, and the clean air side of bags for evidence of leaks at least monthly (see Baghouse Checklist also); and
- ☐ **YES** We do check exterior cleaning system equipment and its operation daily; and check interior cleaning equipment and its operation, and the clean air side of bags for evidence of leaks at least monthly.
- ☐ **NO** We do not check exterior cleaning system equipment and its operation daily; and check interior cleaning equipment and its operation, and the clean air side of bags for evidence of leaks at least monthly. *This is a deviation and must be reported on the DRF-2 form.*

Maintain Records

The owner or operator shall maintain a record of activities conducted consisting of the activity completed, the date the activity was completed, and any corrective action taken; and the owner or operator shall maintain the records required by this subpart for a minimum of five years from the date the record was made.

- ☐ **YES** We do maintain a record of activities for a minimum of *five* years from the date the record was made.
- ☐ **NO** We do not maintain a record of activities for a minimum of five years from the date the record was made. *This is a deviation and must be reported on the DRF-2 form.*

Installation of Monitoring Equipment

The owner or operator of a HMA plant shall install a dryer hour accumulation meter to measure operating hours as specified in part [7011.0922](#), subpart 3, and the monitoring parameters for all asphalt plant control equipment as specified. For HMA plants not in operation on April 22, 1996, the monitoring equipment must be installed prior to operation of any HMA plant equipment controlled by the control equipment. For HMA plants in operation on April 22, 1996, the owner or operator must install monitoring equipment no later than 30 days after April 22, 1996.

- ☐ **YES** We were in operation on April 22, 1996 and have installed an hour accumulating meter to monitor and measure all plant-operating hours.
- ☐ **NO** We were in operation on April 22, 1996 but have not installed an hour accumulating meter to monitor and measure all plant-operating hours. *This is a deviation and must be reported on the DRF-2 form.*

Operation of Monitoring Equipment

The owner or operator of a HMA plant shall operate in compliance with this part the monitoring equipment for each piece of asphalt plant control equipment at all times the asphalt plant control equipment is required to operate.

- ☐ **YES** We do operate in compliance with this part the monitoring equipment for each piece of asphalt plant control equipment at all times the asphalt plant control equipment is required to operate.
- ☐ **NO** We do not operate in compliance with this part the monitoring equipment for each piece of asphalt plant control equipment at all times the asphalt plant control equipment is required to operate. *This is a deviation and must be reported on the DRF-2 form.*

Shutdown and Breakdown Procedures

In the event of a shutdown or breakdown of asphalt plant control equipment, the owner or operator of a HMA plant shall comply with part [7019.1000](#).

- ☐ **YES** We do report all shutdowns or breakdowns of asphalt plant control equipment in accordance with part 7019.1000.
- ☐ **NO** We do not report all shutdowns or breakdowns of asphalt plant control equipment in accordance with part 7019.1000. *This is a deviation and must be reported on the DRF-2 form.*

Deviation of asphalt plant control equipment from operating specifications

Unless otherwise specified in a part 70, state, or general permit, the owner or operator of a stationary source shall report to the MPCA any recorded reading outside of the specification or range of specifications from any monitored operating parameter required, except that owners and operators with a registration permit option D or capped permit must make this report *only* if a deviation occurred in the reporting period.

- ☐ **YES** We report to the MPCA all recorded readings outside of the specification or range of specifications from any monitored operating parameter.
- ☐ **NO** We do not report to the commissioner all recorded readings outside of the specification or range of specifications from any monitored operating parameter. *This is a deviation and must be reported on the DRF-2 form.*

Monitoring and record keeping for asphalt plant control equipment

Unless otherwise specified in a part 70, state, or general permit, the owner or operator of a HMA plant shall comply with the monitoring and record keeping required by the table in this subpart for asphalt plant control equipment. The owner or operator shall maintain the records required by this subpart for a minimum of *five* years from the date the record was made.

EPA Id No.	Pollution Control Equipment Type	Monitoring Parameters	Record Keeping Requirement
001, 002, 003	"Miscellaneous Wet Scrubber" means a control device in which the particulates in the incoming gas stream are entrained by a liquid and the control device is not a spray tower, venture scrubber, impingement plate scrubber, or a wet cyclone separator.	Pressure drop, liquid flow rate, and water pressure	Record each parameter every calendar day of operation
016	"Fabric Filter" (Bag House) means a control device in which the incoming gas stream passes through a porous fabric filter forming a dust cake.	Pressure drop	Record every calendar day of operation
052	"Spray Tower" means a control device in which the incoming gas stream passes through a chamber in which it contacts a liquid spray.	Liquid flow rate, pressure drop, and water pressure	Record each parameter every calendar day of operation
053	"Venturi Scrubber" means a control device in which the incoming gas stream passes through a venture into which low pressure liquid is introduced.	Pressure drop, liquid flow rate, and water pressure	Record each parameter every calendar day of operation
055	"Impingement Plate Scrubber" means a control device in which the incoming gas stream passes a liquid spray and is then directed at high velocity into a plate.	Pressure drop, liquid flow rate, and water pressure	Record each parameter every calendar day of operation
085	"Wet Cyclone Separator" or "Cyclonic Scrubbers" means a cyclonic device that sprays water into a cyclone.	Pressure drop, water pressure, and water flow rate	Record each parameter every calendar day of operation
019	"Afterburners" (thermal Combustion or catalytic oxidation) means a device used to reduce VOCs to the products of combustion through thermal (high temperature) oxidation or catalytic (use of a catalyst) oxidation in a combustion chamber.	Combustion temperature or inlet and outlet temperatures	Continuous hard copy readout of temperatures or manual readings every 15 minutes of operation

- ☐ **YES** We do comply with the monitoring and record keeping required by the table above in this subpart for asphalt plant control equipment. We also do maintain the records required by this subpart for a minimum of *five* years from the date the record was made. This checklist is complete.
- ☐ **NO** We do not comply with the monitoring and record keeping required by the table above in this subpart for asphalt plant control equipment. We also do not maintain the records required by this subpart for a minimum of *five* years from the date the record was made. *This is a deviation and must be reported on the DRF-2 form.* This checklist is complete.