



**Minnesota Pollution
Control Agency**

520 Lafayette Road
St. Paul, MN 55155-4194

Hot Mix Asphalt Plants Compliance Audit

Baghouse Control
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: _____

Baghouse Control System

Operation of hot mix asphalt (HMA) plant control equipment

The owner or operator of a HMA plant must operate the baghouse control equipment in the range established by the control equipment manufacturer's specifications, or within the operating parameters established by the MPCA as the result of the most recent performance test conducted under parts 7017.2001 to 7017.2060, if those are more restrictive. The HMA plant must operate the baghouse in compliance whenever operating the asphalt plant.

1. Do you operate your baghouse control equipment in accordance with the manufacturer's specification or your most recent performance test?

- ☐ **YES** We do operate our baghouse control equipment in accordance with the manufacturer's specification or our most recent performance test.
- ☐ **NO** We do not operate our baghouse 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.*

Baghouse control equipment alternative range

The owner or operator applying for a registration permit or capped permit may request an *alternative range* to the baghouse control equipment manufacturer's specifications, if the proposed range is based on two previous years of compliance 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 MPCA.

2. Do you operate your HMA plant baghouse control equipment in an *alternative range* to the control equipment manufacturer's specifications?

- ☐ **YES** We do operate our HMA plant baghouse control equipment in an *alternative range* to the control equipment manufacturer's specifications based on two previous years of compliance monitoring data.
- ☐ **NO** We do not operate our HMA plant baghouse in an *alternative range* to the control equipment manufacturer's specifications based on two previous years of compliance monitoring data.
- A.** An owner or operator has failed to disclose fully all facts relevant to the proposed monitoring parameter range of the asphalt plant baghouse control device or the owner or operator has knowingly submitted false or misleading information to the MPCA.

3. **Have you disclosed all facts relevant to the proposed monitoring parameter range of your plant baghouse control device?**
- ☐ **YES** We have disclosed all facts relevant to the proposed monitoring parameter range of our plant baghouse control device.
- ☐ **NO** We have not disclosed all facts relevant to the proposed monitoring parameter range of our plant baghouse 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.*
- A. Operation of the baghouse 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.
4. **Do you inspect you asphalt plant baghouse control equipment in accordance with part 70, state, or general permit annually?**
- ☐ **YES** We are currently operating the HMA plant baghouse 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 baghouse control equipment

The owner or operator of a HMA plant shall maintain each piece of asphalt plant baghouse 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.

- ☐ **YES** We do continue to maintain each piece of our HMA plant baghouse 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.*

The HMA Plant must perform the following on each piece of asphalt plant control equipment unless otherwise specified in a part 70, state, or general permit:

- A. Thoroughly inspect all asphalt plant baghouse control equipment, including structural components, *annually*.
- ☐ **YES** We do inspect our asphalt plant baghouse control equipment in accordance with part 70, state, or general permit *annually*.
- ☐ **NO** We do not inspect our asphalt plant baghouse control equipment *annually*. *This is a deviation and must be reported on the DRF-2 form.*
- B. Inspect baghouse ducts, connections, and housings for leaks *monthly*.

5. **Do you inspect your baghouse ducts, connections, and housings for leaks monthly?**

- ☐ **YES** We do inspect our asphalt plant baghouse control equipment inspect ducts, connections, and housings for leaks monthly.
- ☐ **NO** We do not inspect our asphalt plant baghouse control equipment ducts, connections, and housings for leaks monthly. This is a deviation and must be reported on the DRF-2 form.

Check baghouse monitoring equipment

Check monitoring equipment *daily* to ensure it is operating in the range required by, for example: pressure gauges, temperature indicators, flow gauges, and recorders.

6. **Do you check your asphalt plant baghouse control system monitoring equipment daily to ensure it is operating in the range required?**
- ☐ **YES** We do check our asphalt plant baghouse control system monitoring equipment *daily* to ensure it is operating in the range required.
- ☐ **NO** We do not check our asphalt plant baghouse control system monitoring equipment *daily* to ensure it is operating in the range required. This is a deviation and must be reported on the DRF-2 form.

Calibrate monitoring equipment

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.*

Cleaning equipment

For all fabric baghouse control devices you must 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*.

7. Do you check the 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*?

- ☐ **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 baghouse activities conducted above, as well as the date the activity was completed, and any corrective action taken; and the owner or operator shall maintain the records required for a minimum of *five* years from the date the record was made.

8. Do you maintain a record of baghouse activities 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 Hour Accumulating Meter Monitoring Equipment

The owner or operator of a HMA plant shall install monitoring equipment (Hour Accumulating Meter) to measure *operating hours* as specified in part 7011.0922, subpart 3, and the monitoring parameters for all asphalt plant control equipment. 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.

9. Were you in operation on April 22, 1996, and have you installed an Hour Accumulating Meter to monitor and measure all plant operating hours?

- ☐ **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 must 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.

10. Do you operate in compliance 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 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 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 baghouse control equipment, the owner or operator of a HMA plant shall comply with part 7019.1000.

11. Do you report all shutdowns or breakdowns of asphalt plant baghouse control equipment in accordance with part 7019.1000?

- ☐ **YES** We do report all shutdowns or breakdowns of asphalt plant baghouse 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 an asphalt plant baghouse 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 commissioner 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 shall make this report *only if a deviation occurred* in the reporting period. *This is reported on the DRF-2 form.*

12. Do you report to the commissioner all recorded readings outside of the specification or range of specifications from any monitored operating parameter?

- ☐ **YES** We report to the commissioner all recorded readings outside of the specification or range of specifications from any monitored operating parameter. This checklist is complete.
- ☐ **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.* This checklist is complete.