Hot Mix Asphalt Plants - Air Compliance Checklist

Tennessee's Small Business Environmental Assistance Program (SBEAP) hot mix asphalt plant compliance audit checklist is designed to identify potential compliance issues. Because 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 any conditions that you discover as you complete this evaluation, please contact:

Tennessee Department of Environment and Conservation (TDEC)
Small Business Environmental Assistance Program (SBEAP)
1-800-734-3619 or (615) 532-8012
Email: BGSBEAP@state.tn.us
http://state.tn.us/environment/ea/sbeap/

Date of Audit: _____

Company Name: _____

Authorized Representative Name: _____ Title: _____

Note: If non-compliance is determined, TDEC has a non-compliance Self Policing Audit Policy for self disclosure. You should contact the SBEAP at 1-800-734-3619 or see the policy and use the generic penalty waiver letter request form. Check your permit for non-compliance disclosure requirements.

1. Do you have a current air permit issued by the State of Tennessee Air Pollution Control (APC) agency or a local air program?

☐ **YES** We do have a current air permit. (Check expiration date to ensure!)

☐ **NO** We do not have a current air permit issued by APC or a local air program. *This is a non-compliance status and should be corrected. For sources regulated by the State of Tennessee: Application forms APC 20 and 33 may be found at* : http://www.state.tn.us/environment/permits/airoper.shtml or call the SBEAP at 1-800-734-3619. *Sources located in Knoxville, Chattanooga, Memphis and Nashville should contact their local air pollution agency.*

Note: If your permit will expire during the year, you must apply to renew your permit at least 60 days or more before the expiration date. Check your permit for required application submittal time.

2. **Do you monitor overall compliance and meet all conditions as listed on your air permit? (Please read your permit!)**

   ☐ **YES** We do monitor compliance and meet permit conditions as listed on our permit.

   ☐ **NO** We do not monitor compliance and/or are not meeting all permit conditions. *This is a non-compliance issue that should be corrected. Contact SBEAP at 1-800-734-3619 if assistance is needed.*

3. **Do you track your hours of operation on a monthly basis and keep records if required by your air permit?**

   ☐ **YES** We do track hours of operation and keep a monthly log for compliance review.

   ☐ **NO** We do not track hours of operation, nor keep a log for compliance review. *This may be a non-compliance issue that should be corrected. Contact SBEAP at 1-800-734-3619 if assistance is needed.*

4. **Do you have visible emissions at your facility during asphalt production and are you satisfying opacity limits?**

   ☐ **YES** We have visible emissions during asphalt production and plant operations. However, these are in compliance with stated opacity limits in our permit conditions.

   ☐ **NO** We do not meet opacity limits assigned in our permit conditions. *This is a non-compliance issue that should be corrected. Contact SBEAP at 1-800-734-3619 if assistance is needed.*

Note: Permit conditions limit the amount of visible emissions based on how much of a view is blocked by a plume of smoke or dust.

5. **Do you annually submit by March 31st a compliance certification report to APC? (This is required If you are a major or conditional major source)**

   ☐ **YES** We do annually submit a compliance certification report to APC.

   ☐ **NO** We do not annually submit a compliance certification report to APC. *This may be a non-compliance issue that should be corrected. Contact SBEAP at 1-800-734-3619 if assistance is needed.*

6. **Do you ensure that waste materials are not burned onsite (i.e. burn barrels or piles)?**

   ☐ **YES** We affirm that no waste materials are burned onsite.

   ☐ **NO** We at times have burned or may burn waste materials onsite. *This may be a non-compliance issue and you should contact SBEAP at 1-800-734-3619 if assistance is needed to make sure this is not a violation. Also, check permit conditions.*

7. **Do you maintain required records that may include your production and/or fuel usage?**

   ☐ **YES** We do maintain required records.

   ☐ **NO** We do not maintain records. *This may be a non-compliance issue that should be corrected. Contact SBEAP at 1-800-734-3619 if assistance is needed.*

Asphalt Plant Environmental Factors

Typically, asphalt plants that have an asphalt drum dryer, one or more asphalt cement tanks, a waste oil tank, a diesel tank, and/or an emergency generator will need to deal with several environmental concerns that include: air emissions and fugitive dust. These environmental factors are addressed by an air quality permit, air emissions control equipment, noise abatement equipment, restricted hours of operation, and proper watering to minimize fugitive dust.

Dust from open areas, often called "fugitive" dust, is a form of air pollution. Many hot mixed asphalt plants use water or various types of chemicals as surface treatments to help control fugitive dust. The following outlines some of the water quality issues you should consider when using surface treatments (other than water), so your air-pollution solution doesn't turn into a water pollution problem.

Helpful Suggestions for Dust Emissions abatement

- Consider non-chemical dust control alternatives, such as wind fences/barriers, fiber mulches, paving, reducing vehicle speed and cover open areas with less erodible materials.
- Avoid applying so much liquid that it ponds or runs off the application area. Avoid applications close to ditches, streams, wetlands and other surface waters.
- Avoid applications near wells or where chemicals can easily contaminate ground water. Avoid applications when it is raining, if it may rain soon, or if the surface is frozen.
- Consider how frequently different stabilizer options need to be reapplied.
- Know the complete chemical content, aquatic toxicity and human health effects of any dust-control material. Request such information from potential vendors before any purchase.
- When leaving the load-out area ensure that all asphalt trucks are properly covered to reduce fugitive dust.

Do you have and do you practice a formal fugitive dust abatement program at your plant using any or all of the measures described above?

☐ **YES** We do have and do practice proper fugitive dust abatement measures at our plant and as detailed above.

☐ **NO** We do not have and do not practice proper fugitive dust abatement measures as detailed above. Y*ou should consider starting an abatement program.*

- This checklist is complete -

Thanks to the Minnesota Small Business Environmental Assistance Program. This document is a modification of a checklist developed the Minnesota program.