



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Bituminous Roadways, Minneapolis, Minnesota

**FROM:** Jacob Herbers, Environmental Engineer  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Supervisor  
AECAB (MI/WI)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Bituminous Roadways

**Facility Location:** 2828 Longfellow Ave, Minneapolis, MN 55407

**Date of Inspection:** May 26, 2023

**EPA Inspector(s):**

1. Jacob Herbers, Environmental Engineer
2. Karina Kuc, Environmental Engineer
3. Emma Leeds, Environmental Engineer

**Other Attendees:**

1. Dave Rupp, Asphalt Plant Operator
2. Brad Nelson, Loader Operator
3. Tammy Hoyle, Scale Operator

**Contact Email Address:** Tammy.Hoyle@bitroads.com

**Purpose of Inspection:** Investigate compliance with the Clean Air Act and the Minnesota State Implementation Plan.

**Facility Type:** Hot mix asphalt processing facility

**Regulations Central to Inspection:** National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asphalt Processing and Asphalt Roofing Manufacturing Area Sources (40 C.F.R. Part 63, Subpart AAAAAAA), NESHAP General Provisions (40 C.F.R. Part 63, Subpart A), New Source Performance Standards (NSPS) for Standards of Performance for Hot Mix Asphalt Facilities (40 C.F.R.

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Part 60, Subpart I), and Minnesota Rules, 7011.0150 - Preventing Particulate Matter (PM) from Becoming Airborne.

**Arrival Time:** 12:15 CDT

**Departure Time:** 13:10 CDT

**Inspection Type:**

Unannounced Inspection

**OPENING CONFERENCE**

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet
- Provided CBI warning to facility

The following information was obtained verbally from Dave Rupp, Brad Nelson, and Tammy Hoyle unless otherwise noted.

**Process Description:**

The facility produces asphalt mixes. Aggregate is trucked in and placed in piles on site. A loader feeds the aggregate through a drum where it is dried and heated at 350 °F by a gas burner. The aggregate is then sent up a conveyer and weighed.

A fan sucks dust from the dryer through the primary collector, and then into a baghouse with 400 filter bags. Dust is shaken out of the baghouse and is recycled through an auger back into the dryer. The baghouse is the only control device at the facility.

Meanwhile, a 35,000 Gallon bitumen oil tank is heated up to 300 °F, 24/7. An odorous additive called “cherry juice” is mixed into the tank at a rate of approximately 0.5 Gallons of cherry juice for 6,000 Gallons of bitumen. The tank receives bitumen from tankers trucks, and vents during pumping.

Aggregate and bitumen are combined in a pugmill mixer, where it becomes asphalt. The asphalt is then dumped into trucks.

**Staff Interview:**

Facility staffed stated that this is a hot mix asphalt facility that produces approximately 100,000 tons of final product annually.

The facility has operated since 1946 and was reconstructed in 1973. They currently have three employees on site. They operate starting 07:00 and until between 15:30-18:00 Monday through Friday, sometimes Saturdays, and rarely Sundays. They operate seasonally, usually mid-April through late November.

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Their asphalt is 100% recyclable, and they recycle everything they take in. They use recycled millings, which are mixed in after the drums. They use biodegradable spray release.

Facility staff claimed that the fumes from the bitumen tank were just steam from the cherry juice venting while the tank was being loaded, which typically happens 1-3 times per day.

The baghouse is inspected every morning, including a check for visible dust from the top of the stack. Baghouse pressure drop is on the checklist and is typically set between 2-4 inches of water column (in. H<sub>2</sub>O). Drum negative pressure is typically between 0.38-0.5 in. H<sub>2</sub>O. They sweep the parking lot every few weeks.

### **TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

#### **Data Collected and Observations:**

EPA Inspectors observed fumes coming from the oil tank vent (see images 1-2). There were significant visible PM emissions coming from the mixer and loader, every time a truck was loaded with asphalt (see images 5-8). There were also visible PM emissions from both incoming and outgoing trucks: this occurred in different parts of the parking lot, and on the west property line adjacent to an apartment building. There were also visible PM emissions from aggregate piles (see image 3).

The display in the trailer by the mixer read the following values:

Mix Temperature	318 °F
Aggregate Temperature	545 °F
Burner	25 %

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were not taken during this inspection.

### **CLOSING CONFERENCE**

Provided U.S. EPA point of contact to the facility

#### **Requested documents:**

- Facility map
- Process flow and emissions flow diagrams
- Air emission modeling documentation
- Maintenance records (filter changeouts, air duct and tank integrity, etc.)
- Annual Emissions Reports from the past 5 years
- All stack test reports
- Baghouse monitoring SOPs
- Notices of Compliance Status for NESHAP AAAAAAA and NSPS I

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**Concerns:** EPA expressed concerns about significant uncontrolled PM emissions escaping the facility and affecting the surrounding Environmental Justice Community.

**DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_

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**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Karina Kuc	<b>2. Archival Record Location:</b> EPA Electronic Records
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<b>Image #</b>	<b>File Name</b>	<b>Date &amp; Time (CDT)</b>	<b>Image Description</b>
1	P5260141.JPG	2023:05:26 12:33:45	Bitumen tank venting
2	P5260142.JPG	2023:05:26 12:33:47	Bitumen tank venting
3	P5260143.JPG	2023:05:26 12:54:09	Aggregate piles
4	P5260144.JPG	2023:05:26 12:54:42	Dust from mixer bins
5	P5260145.JPG	2023:05:26 12:56:43	Airborne dust while mixer is on
6	P5260146.JPG	2023:05:26 12:56:48	Airborne dust while mixer is on
7	P5260147.JPG	2023:05:26 12:56:57	Airborne dust while mixer is on
8	P5260148.JPG	2023:05:26 12:57:47	Airborne dust while mixer is on