



# Asphalt Processing & Asphalt Roofing Manufacturing Area Source NESHAP

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# Introduction

- NAICS 324110
  - Petroleum (Asphalt) Refining
- NAICS 324122
  - Asphalt Shingle & Coating Materials Manufacturing
- Listed for regulation under CAA section 112(k)
  - HAP: Polycyclic Organic Matter (POM) as Polycyclic Aromatic Hydrocarbons (PAH-7)



## Background

- Estimated to impact 75 facilities
- Estimate 11 small businesses
  - Small business definition is <750 employees



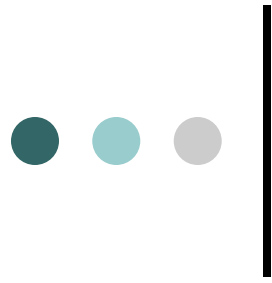
# Emissions

- Baseline emissions take into account reductions (before controls) achieved by process changes implemented by industry since 1990, which are:
  - PAH: 0.0015 lbs/ton of product manufactured
  - Total HAP: 0.02 lbs/ton of product manufactured
  - Total hydrocarbons: 0.29 lbs/ton of product manufactured
  - PM: 0.58 lbs/ton of product manufactured
- Average facility emits about 85 lbs PAH per year
- Potential emitting processes:
  - Blowing Still (Asphalt Processing Operation)
  - Asphalt Saturator Operation
  - Asphalt Coating Operation



# Proposed Subcategorization

- Observed differences between facilities based on process type:
  - Blowing Stills
  - Saturator Operations
  - Combination Saturator & Coating Operations
  - Coating Operations



# Proposed GACT

- Requires performance based emissions limits:
  - Blowing Stills      0.003 lb/ton PAH or 1.2 lb/ton PM
  - Saturators            0.0004 lb/ton PAH or 0.05 lb/ton PM
  - Saturator/Coater    0.0006 lb/ton PAH or 0.07 lb/ton PM
  - Coaters Only        0.0002 lb/ton PAH or 0.03 lb/ton PM
- No management or equipment practices required.
- Anticipated controls mainly thermal oxidation, HEAF or fiber bed filter (which already exist).



## Total Costs

- Monitoring Recordkeeping and Reporting:
  - \$236,000 annual cost to industry
  - Approximately 3,100/year per facility
- No new capital costs expected



## **Proposed Notification, Recordkeeping, and Reporting Requirements**

- Initial Notification: basic information about facility and its operations (submitted 120 days after publication).
- Notification of Compliance Status: Statement that source has complied with all relevant standards (submitted 120 days after compliance date).
- Requires continuous parametric monitoring (e.g., pressure drop, temperature, etc.) recorded on a 3-hr average.



## **Proposed Notification, Recordkeeping, and Reporting Requirements (cont.)**

- Semi-Annual Compliance Report
- Can demonstrate compliance with existing tests if conducted within last 5 years and is representative of process.
- Records to be kept for at least 5 years, the first 2 on-site.



# Applicability

## ○ Excludes:

- Facilities that do not use asphalt
- Hot-mix asphalt operations used for paving roads
- On-site built-up roofing operations



# Contact Information

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Comments to Docket:

ID No. EPA-HQ-OAR-2009-0027

[www.epa.gov/oar/docket.html](http://www.epa.gov/oar/docket.html). Follow the instructions for submitting comments.

E-mail: [a-and-r-Docket@epa.gov](mailto:a-and-r-Docket@epa.gov). Include Docket ID No. in the subject line.

Fax: (202) 566-9744, Attention Docket ID No. EPA-HQ-OAR-2009-0027