REGION 4
ATLANTA, GA 30303

April 2, 2026

Ms. Mary Barton, P.E.
Environmental Compliance Manager
Tetra Tech, Inc.
280 Interstate North Circle SE, Suite 300
Atlanta, Georgia 30339

Subject: Conditional Approval of Performance Test Waiver under 40 CFR part 60, subpart Kc for IKO South, Inc. "Asphalt Flux" Storage Tanks — Maxville, Florida

Dear Ms. Barton:

On February 10, 2026, you requested that the U.S. Environmental Protection Agency waive certain performance testing requirements under 40 CFR part 60, subpart Kc (NSPS Kc) applicable to "asphalt flux" storage tanks at the new IKO South, Inc. (IKO) asphalt shingle manufacturing facility in Maxville, Florida. Specifically, you sought a waiver under §60.8(b)(4) of the maximum true vapor pressure (MTVP) determination required prior to initial filling of storage vessels under §60.113c(d), based on testing conducted with a modified ASTM D2879 method, pending development and the EPA review of a formal alternative test method under §60.113c(d)(1)(iv) and §60.8(b)(2) and/or §60.8(b)(3).

Applicable regulations

- NSPS Kc: 40 CFR part 60, subpart Kc – Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023
    - Requirement for MTVP determination prior to initial filling: §60.113c(d)
    - Alternative/equivalent test method process: §60.113c(d)(1)(iv); see also §60.8(b)(2)–(3)
    - Volatile Organic Compound (VOC) control requirements applicability threshold: §60.110c(c)(1)
        - 0.5 psi [3.4 kPa] MTVP threshold for tanks greater than 40,000 gallons
- NSPS A: 40 CFR Part 60, Subpart A – General Provisions
    - Waiver of performance test requirements based on other means of demonstrating compliance: §60.8(b)(4)

The EPA grants conditional approval of IKO's performance test waiver under §60.8(b)(4) for a period of 360 days from the date of this letter. IKO has demonstrated by other means to the Administrator's satisfaction that the affected facility is in compliance with the standard for purposes of establishing

MTVP for its "asphalt flux" and determining applicability under §60.110c(c)(1). This approval does not approve a new or alternative test method under §60.113c(d)(1)(iv) but requires that IKO seek such approval promptly.

Rationale for Approval

NSPS Kc lists ASTM D6377-20 and ASTM D6378-22 for MTVP determination at §60.113c(d). The NSPS Kc proposal (88 FR 68550) explains these methods were adopted to improve measurement accuracy over methods referenced in NSPS Kb (ASTM D2879-83/-96/-97). No comments submitted to the docket for this rulemaking specifically indicated that the revised MTVP test methods could not be used for asphalt materials. After promulgation of the Kc final rule, IKO and the Asphalt Roofing Manufacturers Association informed the EPA that the listed NSPS Kc methods are not appropriate for certain asphalt materials stored in heated tanks because the materials are solid at the maximum allowable test temperatures, rendering these methods inapplicable. The EPA agrees the listed methods will not work for certain asphalt materials, including IKO's "asphalt flux."

IKO has been engaging informally over the past few months with the EPA's Office of Clean Air Programs (OCAP), Regulatory Assistance Division (RAD) to demonstrate an equivalent alternative test method. IKO measured MTVP of the "asphalt flux" feedstock through PRI Asphalt Technologies using a modified ASTM D2879 procedure tailored to high-viscosity asphalt materials. In emails dated February 10–11, 2026, you and Mr. Steven Grier confirmed that the maximum test temperature reflects the highest expected tank operating temperature based on similar IKO facilities. At the highest expected storage temperature, the measured MTVP was 0.43 psi, below the 0.5 psi threshold for VOC control under §60.110c(c)(1). IKO also provided preliminary results of a study performed by PRI in support of demonstrating the equivalency of the modified ASTM D2879 method to the methods required in NSPS Kc at §60.113c(d). Supporting details excerpted from your request letter are provided in Appendix A.

Given the unique material-specific constraints, the preliminary dataset, and IKO's stated plan to promptly submit a formal alternative test method request, the EPA concludes the evidence satisfies §60.8(b)(4) to justify a conditional waiver while alternative method review proceeds.

Conditions of approval

- Within 60 days of the date of this letter, IKO must submit to the EPA a formal alternative test method request under §60.113c(d)(1)(iv) for the modified ASTM D2879 method used to generate the MTVP results described in Appendix A.
- IKO must work proactively with the EPA's RAD to develop and provide additional evidence as needed supporting review of the modified ASTM D2879 as an equivalent alternative test method to the NSPS Kc-listed methods for MTVP.
- IKO may seek to demonstrate the equivalence of a different test method, other than the modified ASTM 2879 referenced in your request and in this letter but must secure the EPA's approval of such method as an alternative test method per §60.113c(d)(1)(iv). Once approved, the alternative method must be used to determine MTVP for IKO's "asphalt flux" to establish applicability under §60.110c(c)(1).

- If the EPA has not approved an alternative MTVP test method within 180 days of the date of this letter, IKO must notify the EPA Region 4 and OCAP's RAD of the pending waiver expiration and initiate dialogue to determine a path forward.

If IKO fails to meet these conditions within 360 days or otherwise resolve this issue with the EPA, the EPA may consider IKO to be in violation of §60.113c(d) MTVP testing requirements.

This waiver applies only to the MTVP determination requirement under §60.113c(d) for the "asphalt flux" tanks identified in your request, and only for the 360-day period specified, subject to the conditions above. This letter does not approve an alternative test method under §60.113c(d)(1)(iv), does not waive any other requirements of subpart Kc or other applicable regulations, and does not constitute a final agency action of general applicability. The EPA may modify or rescind this conditional approval if circumstances or facts change.

This response was coordinated with the EPA's OCAP and Office of Enforcement and Compliance Assurance (OECA). This approval is based on the information provided to the EPA and the EPA may alter this approval in the future if the agency determines that it is warranted.

If you have questions, please contact Jake Carpenter at (404) 562-9039 or carpenter.jacob@epa.gov.

Sincerely,

DENISSE DIAZ

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Denisse D. Diaz
Director
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cc: Steven Grier, HSS Enterprises
David Read, FL DEP
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Kim Garnett, EPA OCAP RAD
Donna Nolen-Weathington, EPA OCAP RAD
David Berkowitz, EPA OCAP RAD
Morgan Everitt, EPA OECA OC

Appendix A — Excerpt from IKO's February 10, 2026 request letter to EPA

IKO arranged vapor pressure testing of their intended feedstock from a lab, PRI Asphalt Technologies of Tampa, Florida, who uses a modified ASTM 2879 to do this testing on flux and other problematic materials. The modification involves the use of a metal chamber in lieu of a glass isotenoscope in order to better accommodate asphalt's high viscosity and other physical properties. Samples are homogenized at 325°F, loaded into the testing chamber and allowed to cool to ambient temperature before sealing, and vacuuming down the headspace of the chamber. The chamber with sample is then elevated to the specified testing temperature and the pressure increase is measured.

The test was run in October 2025 and the results at three different possible tank maximum temperatures were all below the 0.5 psi (3.4 kPa) threshold for VOC control per Subpart Kc for tanks with capacity greater than 40,000 gallons, as shown in the table below:

DATA/RESULTS:

PROPERTY		TEST METHOD	SPECIFICATIONS	RESULTS
Select Properties				
Vapor Pressure, psi	387°F	D2879M	Report	0.35
	409°F			0.39
	432°F			0.43

PRI had also done a small study of this modified method on another material, to evaluate VOC bias possibly introduced in the early headspace purging step in Method 2879. EPA has expressed concern that this step may bias VOC low. The small data set was done on a material with known volatility which would be more likely to show bias. The results showed no such bias. This data set is shown in the table below:

Property		Test Method	RESULTS, Replicate ID				Tech
			No Vac - #1	No Vac #2	Vac - #1	Vac - #2	
Vapor Pressure, psi	25°C	D2879M	0.0	0.0	0.0	0.0	
	50°C		1.0	0.9	1.1	1.0	
	75°C		1.7	1.7	1.7	1.6	
	100°C		2.6	2.7	2.5	2.6	
	125°C		3.7	3.9	3.7	4.0	
	150°C		4.8	5.0	4.7	5.0	
	163°C		5.5	5.9	5.4	5.9	
	175°C		6.0	6.1	6.1	6.1	

We understand that approval of Method 2879M would need to be based on a larger body of data, and IKO will continue to work with PRI to develop sufficient data to secure approval of the test method. A formal request for approval of an alternative test method will be developed and sent in a separate mailing.