INDUSTRY-SPECIFIC EMISSION FACTORS FOR THE ASPHALT ROOFING MANUFACTURING INDUSTRY

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1. INTRODUCTION

According to the Asphalt Roofing Manufacturers Association (ARMA)'s website, asphalt has proved the most popular roofing material in North America.¹ ARMA's quarterly report for the fourth quarter of 2018 states that over 143 million squares of asphalt shingles were shipped during the year.² This paper summarizes the development of industry-specific emissions factors for the asphalt roofing manufacturing industry.

The federal Clean Air Act requires industrial facilities, including those in the asphalt roofing manufacturing industry, to quantify emissions to the ambient atmosphere for permitting and compliance purposes. The U.S. Environmental Protection Agency (EPA)'s primary source of standard emission factors to be used to quantify emissions from stationary sources is *Volume I, Stationary Point and Area Sources*, or the *Compilation of Air Pollutant Emission Factors*, known as AP-42. Section 11.2 of AP-42 provides emission factors and emission calculation methodologies for asphalt roofing, but was last updated in January 1995. The factors provided in this AP-42 section were based on limited data from a few sources for a limited number of pollutants. These factors are now over 20 years old, were based on data from the 1970s, and include test results from sources operating with control technologies that are now obsolete.³

Recognizing that the AP-42 factors published by the EPA in 1995 were not representative of the emissions test data available at the time, ARMA produced an internal report in 2003 (ARMA 2003) that evaluated the stack test data from over twenty facilities around the country (2003 emissions database) that included emission factors for certain criteria air pollutants, criteria pollutant precursors, and hazardous air pollutants (HAPs) emitted by asphalt blowing stills, oxidized asphalt tanks, and coaters.⁴ In 2005, the emissions factors from the internal ARMA 2003 report were published in a peer reviewed paper (the Trumbore 2005 paper).⁵ Since that time, the Trumbore 2005 paper has been widely used as the basis for permitting asphalt roofing manufacturing processes by the industry and accepted by EPA and state regulatory agencies in lieu of AP-42 emission factors. ARMA 2003 and Trumbore 2005 include the same set of emission factors based on the 2003 emissions database. For the remainder of this report, these factors will be referred to as the Trumbore 2005 emission factors since that publication is publicly available and was peer-reviewed.

In 2015, Trinity Consultants (Trinity) was contracted by ARMA to develop a database of stack testing data as a first step in developing emissions factors using more recent stack testing data and the methodologies published in the Trumbore 2005 paper. In 2019, Trinity collected and compiled emissions test data for testing conducted

¹ <u>https://asphaltroofing.org/about-arma/about-us/</u>

² https://asphaltroofing.org/wp-content/uploads/2019/01/ARMA-q4-upload-doc.pdf

³ Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. DOI: 10.1002/ep.10071

⁴ EME Solutions, Inc., "Proposed Emission Factors For Criteria Pollutants and Hazardous Air Pollutants from Asphalt Roofing Manufacturing," May 2003.

⁵ Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. DOI: 10.1002/ep.10071

after 2003 in order to ensure no overlap with the 2003 emissions database (the 2019 emissions database). The 2019 emissions database includes stack testing data from 43 plants belonging to nine different asphalt roofing manufacturing companies and developed emission factors for the industry based on this database. This report details the emission factors and calculation methodologies. Please note that the emissions factors presented in this report are based on the best available data as provided to Trinity during the data gathering effort and are not intended to supersede or replace the emissions factors published in the Trumbore 2005 paper. The emission factor development methodology used in this report is consistent with the methodology used in the Trumbore 2005 paper.

Differences between the emissions factors recommended in this report and those in the Trumbore 2005 paper should be resolved on a case-by-case basis by evaluating all relevant factors, including changes in process since the 2003 emissions database was compiled, the underlying stack testing data, and the requirements of the permitting or other settings in which these emissions factors are being used. Companies should use their discretion in determining whether and when the use of the emission factors presented here is appropriate.

This report is organized as follows:

- Section 2 provides an overview of the asphalt roofing manufacturing process including a description of emission sources;
- Section 3 provides a description of methodologies used to develop the 2019 emission factors including: data used to develop factors, emission factor ratings, test methods, and emission factor calculation methodology;
- > Section 4 provides a summary of the emission factors;
- > Appendix A provides tables documenting emission factor development;
- > Appendix B provides Q-Q plots for non-normally or non-log-normally distributed data sets; and
- > Appendix C provides information on datasets that only include one data point.

2. ASPHALT ROOFING MANUFACTURING PROCESS AND EMISSION SOURCES

The asphalt roofing industry manufactures various asphalt products used mainly in roof construction, including asphalt-saturated felt rolls, fiberglass shingles, organic shingles, mineral-surfaced rolled roofing, and smoothsurfaced rolled roofing.⁶ Asphalt roofing manufacturing begins with processing of asphalt flux in the "blowing" process which may be done onsite or pre-blown asphalt can be purchased. Asphalt roofing product manufacturing process consists of six major operations: (1) saturation (for products that contain organic mat only), (2) coating, (3) mineral surfacing (top and bottom), (4) cooling and drying, (5) finishing, and (6) packaging.⁷ The emissions factors for these sources of air emissions were calculated and are presented in this report. They are discussed in the following sections.

2.1. EMISSION SOURCE TYPES

2.1.1. Blow stills

Blow stills are process vessels in which asphalt flux is oxidized by bubbling air through the heated asphalt, to raise the softening point, and to reduce penetration of the oxidized asphalt. According to the 2005 Trumbore paper, airflow typically ranges from 15 to 50 cubic feet per minute (cfm) per ton of asphalt throughput at

⁶ AP-42, Section 11.2.1.

⁷ AP-42, Section 11.2.2.

asphalt temperatures ranging from 400 to 540 degrees Fahrenheit (°F).⁸ Blow stills may operate with or without a metal chloride catalyst such as ferric chloride or ferrous chloride and amendments including polyphosphoric acid, and Recycled Engine Oil Bottoms.

The oxidation reactions which occur, generally yield compounds of higher apparent molecular weight through increased polarity and dehydrogenation.⁹ Emissions generated during the oxidation process include particulate matter (PM), sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen oxide (NO_X), and organic compound emissions. The 2019 emissions database includes emissions from blow stills controlled with direct fired thermal oxidizers (DFTOs) and regenerative thermal oxidizers (RTOs). Emission factors are based on available data for blow stills operating with and without catalyst.

2.1.2. Applicators

Various applicator processes are used in asphalt roofing manufacturing including coaters, laminate applicators, sealant applicators, and saturators. Coaters apply oxidized asphalt with various mineral fillers to shingles and other roofing products. Laminators apply a mixture of asphalt flux, mineral fillers and polymers to shingles to form layered shingle products.¹⁰ Sealant applicators apply a mixture of asphalt flux and polymers to the shingle. Saturators are used to impregnate organic felt with asphalt to make underlayment and rolled roofing products. Emissions from applicators can include PM, SO₂, CO, and organic compounds. Emissions data for the 2019 emissions database were provided for applicators controlled with RTOs, DFTOs, and fume filters, alone or in combination with RTOs, cartridge filters, or high efficiency air filters (HEAF). The 2019 emissions factors include factors for representative applicator types controlled with and without add-on controls. Emission factors for applicators are provided by process type, including coaters, saturators, and other saturators/coaters¹¹. One source test result was provided for laminators. Due to lack of sufficient data, no factors are calculated for laminators.

2.1.3. Wet Loopers

Wet loopers allow the roofing product to continuously move while asphalt has time to penetrate onto the felt.¹² The 2019 emissions database includes wet loopers controlled with fume filters. Emissions from wet loopers can include PM. AP-42 emission factors for saturators include emissions from wet loopers. Since test results for wet loopers are provided, emission factors for this emission source alone are included. Wet loopers are not addressed in the Trumbore 2005 paper.

2.1.4. Tanks

Asphalt flux and finished coating are typically stored in fixed roof tanks operating at temperatures ranging from 250 to 475°F.¹³ Emissions from tanks may be controlled by a variety of methods, including RTO, thermal

9 Ibid.

⁸ Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278.

¹⁰ AP-42, Section 11.2.2.

¹¹ Other saturators/coaters include those units identified as "Organic Saturator/Coater," "Other Saturator/Coater," or "Organic Saturator/mat coater" in data provided by industry. Since no further defining characters were provided, these units were grouped together in this other saturators/coaters category.

¹² AP-42, Section 11.2.2.

¹³ Ibid.

oxidation and filters, or may be uncontrolled. This report presents organic compound factors for coating and flux tanks.

2.1.5. Mixers

Mixers are used to combine asphalt, polymers, and mineral stabilizers. Emissions from mixers may be controlled with fume or cartridge filters or scrubbers.¹⁴ Emissions from mixers can include PM, SO₂, and organic compounds.

2.1.6. Cooling Sections

After coating and application of mineral surfacing, the hot shingles are cooled using water-cooled rolls and/or water sprays.¹⁵ The cooling process has the potential to generate PM emissions and, based on available industry test data, organic compound emissions. The cooling sections included in the 2019 emissions database are not controlled. Emission factors for cooling sections are not presented in AP-42 or in the Trumbore 2005 paper.

2.1.7. Loading Racks

Loading racks are used to load asphalt onto trucks and/or railcars for delivery. Emissions from loading racks include PM, SO₂, CO, NO_X, and organic compounds. Based on available industry test data, emissions from loading racks are typically controlled with RTOs combined with a fume filter. Emission factors for loading racks are not presented in AP-42 or in the Trumbore 2005 paper. Factors are provided for the first time in this paper for this emission source type because sufficient test data are available.

2.1.8. Limestone Crushers

One source test result for filterable particulate were provided for limestone crushers controlled by dust collectors. Due to lack of sufficient data a factor is not calculated for limestone crushers. Emission factors for limestone crushers are not presented in AP-42 or in the Trumbore 2005 paper.

2.1.9. Other Potential Sources

There are other potential sources of emissions at asphalt roofing manufacturing facilities including, but not limited to, granule storage silos, mineral storage silos, mineral run tanks, and granule run tanks. No emissions test data were available for these sources and as such, no emission factors are presented.

3. EMISSION FACTOR DEVELOPMENT METHODOLOGIES

Emission factors were developed for criteria pollutants PM, SO_2 , CO, NO_X , and organic compounds for the following emission source categories:

- > Blow still operating with catalyst
- > Blow still operating without catalyst
- > Applicators (without RTO or DFTO): Coaters
- > Applicators (with RTO or DFTO): Coaters

¹⁴ Ibid.

¹⁵ Ibid.

- > Applicators (without RTO or DFTO): Saturators
- > Applicators (with RTO or DFTO): Saturators
- > Applicators (without RTO or DFTO): Other coaters/saturators
- > Applicators (with RTO or DFTO): Other coaters/saturators
- > Wet Looper
- Coating Tanks
- Flux Tank
- Mixers
- Cooling sections
- Loading Racks (with RTO or DFTO)

Emission factors were developed for HAPs including hydrogen sulfide (H_2S), hydrochloric acid (HCl), and benzene where sufficient data were available. Test data was not provided for other HAPs and as such, no emission factors are presented.

3.1. TREATMENT OF PARTICULATE EMISSIONS

This paper provides emissions factors for filterable particulate matter (PM-filt), condensable particulate matter (PM-cond), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) where test results are available.¹⁶ The regulated particulate pollutants under air quality regulations are PM_{10} and $PM_{2.5}$, including both filterable and condensable PM. However, where PM_{10} and $PM_{2.5}$ factors are not available, total PM can be used as a conservative estimate of PM_{10} and $PM_{2.5}$. Similarly, in cases where PM_{10} emissions factors are presented and no $PM_{2.5}$ emission factor is available, use of the PM_{10} factor as $PM_{2.5}$ is suggested as a conservative estimate.

Test methods 5A and 5 provide a measure of the total filterable PM, while test method 202 provides a measure of total condensable PM. Test method 201A provides a measure of filterable-only PM_{10} and $PM_{2.5}$ emissions. Test method 201A combined with 202 can be used to determine combined, filterable and condensable, PM_{10} and $PM_{2.5}$ emissions. Test results for PM_{10} or $PM_{2.5}$ which were based on method 201A (filterable) only were excluded from the emission factor determination.¹⁷

3.2. TREATMENT OF ORGANIC COMPOUND EMISSIONS

This paper provides factors for total organic compounds (TOC) and total non-methane organic compounds (TNMOC), where test results are available. The regulated pollutant under air quality regulations is often volatile organic compounds (VOC). By definition, VOC excludes methane (which is included in TOC) and ethane (which is included in both TOC and TNMOC). However, where VOC factors are not available, TNMOC or TOC can be used as a conservative estimate of VOC. Test method 25A provides a measure of TOC while a combination of test methods 25A and 18 can provide a measure of TNMOC. To ensure consistency and accurate emission factors,

¹⁶ A small number of test results are reported as total PM (PM-tot), which would include all filterable and condensable PM. However, the tests which provide PM-tot also provide results for PM-filt and PM-cond. Therefore, emission factors for PM-tot are not presented but can be derived from the proposed PM-filt and PM-cond factors.

¹⁷ Filterable only PM₁₀ and PM_{2.5} results were excluded since more test data was available for combined filterable and condensable particulate. In addition, developing emission factors for filterable and another set of factors for total (filterable + condensable) would not be appropriate since they would be based on different data sets and could provide conflicting emission factors.

test results based on method 25A are assumed to represent TOC and results based on methods 25A and 18 are assumed to represent TNMOC, regardless of the pollutant name under which the result was reported.¹⁸

3.3. DATA USED TO DEVELOP EMISSIONS FACTORS

Emission test data from 43 plants belonging to nine (9) different companies in the asphalt roofing manufacturing industry were used to develop emission factors. Test data provided were gathered from stack testing conducted between 1986 and 2018, and only data generated after 2003 were used in the emission factor development.¹⁹ Emission test data were provided as mass-based emission rates, in pounds of emissions per ton of shingles produced (lb/ton shingles) and pounds of emissions per ton asphalt throughput (lb/ton asphalt). It is important to use lb/ton of shingles or lb/ton of asphalt since these emission factors are based on output or input, respectively, and therefore can be used for equipment of varying capacities and operating speeds. Simple pound per hour (lb/hr) emission factors cannot be accurately applied from one piece of equipment since they cannot similarly be scaled for equipment size.

All data provided are post-control technology, when applicable. As such, all developed emission factors are post-control technology when a control technology is utilized.

¹⁸ Some test results were originally reported as VOC in the available test data. These results are used to calculate TOC factors if determined with method 25A or TNMOC if determined with method 25A and 18.

¹⁹ Data generated in 2003 or earlier were excluded to avoid overlapping of data between the previously developed emission factors and this report.

3.3.1. Test Methods

Table 3-1 provides a summary of the test methods used to develop the emissions factors.

Pollutant	Test Methods Used
PM-filt	5A (majority), 5
PM-cond	202
PM10	201A+202
PM _{2.5}	201A+202
SO ₂	6C (majority), 6, 15/16
CO	10
NOx	7E
ТОС	25A
TNMOC	25A+18
H ₂ S	15
HCl	26, 320
Benzene	0030

Table 3-1 Stack Testing Methods

3.3.2. Control Technologies

Table 3-2 below provides a summary of the control technologies included in the test results used to develop the emissions factors for each emission source type. In most cases, the emission factor developed was based on results from representative units with various control types. Applicators are the one exception. Separate emission factors were developed for applicators with and without RTOs or DFTOs, as use of an RTO or DFTO is expected to have a significant impact on emissions and sufficient data were available to support two sets of factors.

Note control technologies shown in Table 3-2 only represent those indicated in data submissions for the 2019 emissions database and may not be inclusive of all control technologies used by industry. For example, the data for tanks in the 2019 emission database was from a single participating company with tanks with uncontrolled emissions. Industry practice demonstrates that tank emissions may be controlled by a variety of methods, including RTO, thermal oxidation and filters, or may be uncontrolled.

Emission Source Type ^A	Control Technologies
Blow still operating with metal chloride catalyst	DFTO, DFTO/knockout tank
Blow still operating without metal chloride catalyst	DFTO, DFTO/knockout tank, RTO/fume filter, other
Applicators (asphalt-based factors, without RTO or DFTO): Coaters	Fume filter/cartridge filter, fume filter
Applicators (shingles-based factors, without RTO or DFTO): Coaters	Fume filter
Applicators (shingles-based factors, with RTO or DFTO): Coaters	RTO, RTO/fume filter
Applicators (shingles-based factors, without RTO or DFTO): Saturators	Fume filter
Applicators (shingles-based factors, with RTO or DFTO): Saturators	DFTO
Applicators (shingles-based factors, without RTO or DFTO): Other saturators/coaters	Fume filter
Applicators (shingles-based factors, with RTO or DFTO): Other saturators/coaters	RTO
Wet Looper	Fume filter
Coating Tank (asphalt-based factors)	None for data included in this study
Flux Tank (asphalt-based factors)	None for data included in this study
Mixers (shingles-based factors)	Fume filter
Mixers (asphalt-based factors)	Scrubber, fume filter/cartridge filter, fume filter
Cooling sections (shingles- based factors)	None for data included in this study
Loading Racks (asphalt-based factors)	RTO/fume filter

Table 3-2 Control Technologies in the 2019 Emissions Database by Source Type

^A Refer to Section 3.3 for discussion of asphalt-based and shingle-based factors.

3.3.3. Test Result Units

Test data were provided in units of lb/ton asphalt and lb/ton shingles depending on whether the test information allowed conversion from one unit to the other. Therefore, where both units were provided, separate factors were developed for each. Test results provided in other units (e.g., mg/dscfm) could not be

used in development of emission factors, because sufficient data was not available to convert these tests to lb/ton asphalt or lb/ton shingles.

3.4. EMISSION FACTOR CALCULATION METHODOLOGY

Emission factors were calculated based on available data for each pollutant, unit of measure, and emission source type combination. In cases where multiple test results are available from a plant for a given pollutant, an emission factor for the plant is first determined by averaging test data provided from the plant. Then, the 2019 emission factor is calculated as the average of the available plant emission factors in the 2019 emissions database. This methodology is consistent with the Trumbore 2005 paper, which generated average emission factors for each plant and then calculated emission factors based on the average of the plant factors.

3.4.1. Non-Detects

The Trumbore 2005 paper handles non-detect emission results in accordance with recommendations in EPA's procedures for preparing emission factor documents, from AP-42. Due to the nature of the test results provided (in lb/ton asphalt or shingles) for the 2019 emissions database, Trinity was unable to determine whether any results were non-detect. Mass-based emission rates provided are used in the development of factors unless otherwise noted in this section.

3.4.2. Data Assumptions Used

For particulate emissions and organic compounds, where the test method was not consistent with the form of the pollutant listed, Trinity assumed that the test method was correct and updated the pollutant accordingly. Test results based on method 25A are assumed to represent TOC and results based on methods 25A and 18 are assumed to represent TNMOC, regardless of the pollutant name under which the result was reported. Test results based on methods 5A and 5 are assumed to represent total filterable PM, test method 202 is assumed to represent total condensable PM, and test method 201A is assumed to represent filterable-only PM₁₀ and PM_{2.5} emissions.

3.4.3. Data Excluded from Emission Factor Development

The following methods were used to exclude data from the development of emission factors:

- Outliers. Outliers are determined in accordance with Appendix C of the EPA's Draft Final Recommended Procedures for Development of Emission Factors and Use of the WebFIRE Database20 using ProUCL, an EPA-developed statistical package. The outlier test is applied to log-transformed data sets in an iterative process until outliers identified with a 95% confidence level have been removed.²¹ The Rosner outlier test is used for data sets containing twenty five (25) or more values, and the Dixon outlier test is used for data sets containing less than 25 values and more than two (2) values. A total of eighteen (18) outliers were identified in this study.
- Test results listed as zero or results with no pollutant or method specified. Test results listed as zero (0) were excluded. Sufficient information was not available to determine whether zero entries were below the

²⁰ U.S. EPA Office of Air Quality Planning and Standards, Sectors Policies & Programs Division, Measurement Policy Group, Draft Final *Recommended Procedures for Development of Emission Factors and Use of the WebFIRE Database*, EPA-453/D-13-001 (August 2013).

²¹ Ibid.

detection limit, an omission in data entry, or no test result was obtained for some reason. Additionally, where a pollutant or test method is not specified, test results are not used, as sufficient information was not available to assign a pollutant.

- PM₁₀ and PM_{2.5} calculated using Method 201A only. As previously discussed, the PM₁₀ and PM_{2.5} emission factors developed and presented in this report include both filterable and condensable PM. Therefore, test results based on Method 201A (filterable only) were excluded from factor development.
- Data sets containing only one (1) test result. Emission factors were determined only for those data sets for which at least two (2) valid test results are available. The table in Appendix C contains a list of emission source type and pollutant combinations that were excluded for this reason.
- > *<u>Test results generated in or before 2003.</u>* Test results generated in or before the year 2003 were excluded from the emission factor calculation.

3.4.4. Normality Test

Each set of test results with at least three data points was reviewed for normality using the Anderson Darling test, similar to the normality test conducted in the Trumbore 2005 paper.²² A data set which has probability values (p values) less than the significance level of 0.05 is assumed to be normally distributed. Additionally, each set of test results was also log-transformed and then again tested for normality. A log-transformed data set which has p values less than 0.05 is assumed to be log-normally distributed. In most cases, the test data was at least log-normally distributed. EPA supports the acceptance of log-normally distributed data for environmental data in its Data Quality Assessment Guidance, noting that "the lognormal is an important probability distribution when analyzing environmental data where normality cannot be assumed."²³ P values for each data set are provided in the tables in Appendix A.

Table 3-3 provides a summary of the results of the Anderson-Darling tests for the emission test data sets.

²² Normality test conducted using excel formulas from www.spcforexcel.com.

²³ U.S. EPA Office of Environmental Information. "Guidance document, Data Quality Assessment: Statistical Methods for Practitioners EPA QA/G-9S," EPA/240/B-06/003, February 2006, page 27.

Emission Source Type ^c	Normally or log-normally distributed data sets	Data sets not normally or log-normally distributed
Blow still operating with metal chloride catalyst	PM-filt, PM-cond, SO ₂ , CO, NO _X , TOC, TNMOC, HCl	H ₂ S
Blow still operating without metal chloride catalyst	PM-cond, PM ₁₀ , PM _{2.5} , SO ₂ , NO _x , TOC, HCl, Benzene	PM-filt, CO, TNMOC
Applicators (asphalt-based factors, without RTO or DFTO): Coaters	PM-filt	None
Applicators (shingles-based factors, without RTO or DFTO): Coaters	PM-cond, PM _{2.5} ª, CO, TOC, Benzene ^a	PM-filt, SO ₂ , TNMOC, H ₂ S
Applicators (shingles-based factors, with RTO or DFTO): Coaters	PM _{2.5} , TOC ^a , H ₂ S ^b , SO ₂ ^a , TNMOC	PM-filt, PM-cond, CO
Applicators (shingles-based factors, without RTO or DFTO): Saturators	PM-filt	none
Applicators (shingles-based factors, with RTO or DFTO): Saturators	PM-filt	none
Applicators (shingles-based factors, without RTO or DFTO): Other saturators/coaters	PM-filt	none
Applicators (shingles-based factors, with RTO or DFTO): Other saturators/coaters	PM-filt ^a	none
Wet Loopers	PM-filt	none
Coating Tank (asphalt-based factors)	ТNMOC	none
Flux Tank (asphalt-based factors)	TNMOC	none
Mixers (shingles-based factors)	PM-filt ^b	none
Mixers (asphalt-based factors)	PM-filt ^a , TOC, SO ₂	none
Cooling sections (shingles-based factors)	PM-filt, PM-cond, PM _{2.5}	ТОС
Loading Racks (asphalt-based factors)	PM ₁₀ , SO ₂ , CO, NO _x ^a , TOC, TNMOC	none

Table 3-3 Results of Anderson-Darling Normality Tests

^a Distribution of data set could not be determined using the Anderson-Darling test because the data set contained only two values. ^b Distribution of data set could not be determined using the Anderson-Darling test because values in the data set were the same.

^cRefer to Section 3.3 for discussion of asphalt-based and shingle-based factors.

Appendix B provides Q-Q plots for the log-transformed data sets which were determined to not be normally or log-normally distributed using the Anderson Darling test. A Q-Q plot provides a visual method to assess log-normality. A linear pattern displayed by the majority of the data suggests approximate log-normality and a

correlation coefficient of 0.95 or greater suggests log-normality.²⁴ Of the twelve (12) data sets which were not normally or log-normally distributed under Anderson Darling, four (4) have a correlation coefficient greater than 0.95. Twelve data sets visually appear to have a generally linear pattern. As such, no data is excluded on the basis of distribution, and emission factors were developed for all data sets for which at least two valid data points are available.

3.5. EMISSION FACTOR RATINGS

Ratings are assigned to each emission factor. To maintain consistency with previously developed factors, EPA's rating system, which is also used in the Trumbore 2005 paper is used in this analysis. EPA's rating descriptions for AP-42 factors are provided in Table 3-4 below. The table also provides a translation of how the ratings were quantitatively assigned to the emission factors.

²⁴ U.S. EPA ORD Site Characterization and Monitoring Technical Support Center "ProUCL Version 5.1.002 Technical Guide; Statistical Software for Environmental Applications for Data Sets with and without Nondetect Observations." EPA/600/R-07/041, October 2015, page 48.

Rating	EPA Description ^{25, 26}	Application of Rating
A	Excellent. Emission factor is developed primarily from A and B rated source test data taken from many randomly chosen facilities in the industry population. The source category population is sufficiently specific to minimize variability.	> 10 plant sampled and > 20 data points
В	Above average. Emission factor is developed primarily from A or B rated test data from a moderate number of facilities. Although no specific bias is evident, is not clear if the facilities tested represent a random sample of the industry. As with the A rating, the source category population is sufficiently specific to minimize variability.	> 5 plant sampled and > 10 data points
С	Average. Emission factor is developed primarily from A, B, and C rated test data from a reasonable number of facilities. Although no specific bias is evident, it is not clear if the facilities tested represent a random sample of the industry. As with the A rating, the source category population is sufficiently specific to minimize variability.	> 1 plant sampled and > 5 data points
D	Below average. Emission factor is developed primarily from A, B and C rated test data from a small number of facilities, and there may be reason to suspect that these facilities do not represent a random sample of the industry. There also may be evidence of variability within the source population.	> 1 plant sampled or > 5 data points
E	Poor. Factor is developed from C and D rated test data from a very few number of facilities, and there may be reason to suspect that the facilities tested do not represent a random sample of the industry. There also may be evidence of variability within the source category population.	1 plant and ≤ 5 data points
U	Unrated (Only used in the L&E documents). Emission factor is developed from source tests which have not been thoroughly evaluated, research papers, modeling data, or other sources that may lack supporting documentation. The data are not necessarily "poor," but there is not enough information to rate the factors according to the rating protocol. "U" ratings are commonly found in L&E documents and FIRE rather than in AP 42.	N/A

Table 3-4 Emission Factor Ratings

4. EMISSION FACTORS

Tables 4-1 through 4-4 provide summaries of the developed criteria pollutant emission factors developed for each emission source type in the asphalt roofing manufacturing industry. Table 4-5 provides a summary of developed HAP emission factors.

²⁵ From AP-42 FAQS (https://www3.epa.gov/ttnchie1/faq/ap42faq.html#ratings).

²⁶ Trinity assumed that emissions test data provided was of high-quality and would be considered either A or B rated source test data under the EPA rating methodology.

Source Type	Units	PM-filt	PM- cond	PM 10	PM _{2.5}	SO 2	CO	NOx	тос	ТММОС
Blow still operating with metal chloride catalyst	lb/ton asphalt	0.025	0.038			0.587	0.255	0.074	0.004	0.035
	Standard Deviation	0.02	0.03	No Data	No Data	0.09	0.20	0.01	0.003	0.03
	Rating	В	С			С	С	С	С	D
Blow still	lb/ton asphalt	0.068	0.028	0.090	0.072	1.074	0.315	0.079	0.025	0.009
operating without metal chloride catalyst	Standard Deviation	0.09	0.03	0.03	0.03	0.37	0.63	0.05	0.033	0.008
	Rating	А	В	Е	Е	С	В	С	С	С

Table 4-1 Criteria Pollutant Emission Factors - Blow Stills

Source Type	Units	PM-filt	PM- cond	PM2.5	SO 2	CO	тос	тлмос
Applicators (asphalt-	lb/ton asphalt	0.011						
based factors, without RTO or DFTO):	Standard Deviation	0.004	No Data	No Data	No Data	No Data	No Data	No Data
Coaters	Rating	D						
Applicators (shingles-	lb/ton shingle	0.005	0.002	0.001	0.002	0.005	0.024	0.052
based factors, without RTO or DFTO): Coaters	Standard Deviation	0.01	0.001	0.0001	0.004	0.003	0.005	0.02
Coaters	Rating	А	В	Е	С	С	D	С
Applicators (shingles-	lb/ton shingle	0.004	0.001	0.001	0.005	0.010	0.014	0.003
based factors, with RTO or DFTO): Coaters	Standard Deviation	0.004	3E-4	2E-4	6E-5	0.007	N/A	0.004
	Rating	С	С	D	Е	С	Е	D
Applicators (shingles-	lb/ton shingle	0.036						
based factors, without RTO or DFTO): Saturators	Standard Deviation	0.04	No Data	No Data	No Data	No Data	No Data	No Data
	Rating	С						
Applicators (shingles-	lb/ton shingle	0.004						
based factors, with RTO or DFTO):	Standard Deviation	0.002	No Data	No Data	No Data	No Data	No Data	No Data
Saturators	Rating	Е						
Applicators (shingles-	lb/ton shingle	0.005						
based factors, without RTO or DFTO): Other	Standard Deviation	0.003	No Data	No Data	No Data	No Data	No Data	No Data
saturators/coaters	Rating	D						
Applicators (shingles-	lb/ton shingle	0.054						
based factors, with RTO or DFTO): Other	Standard Deviation	0.03	No Data	No Data	No Data	No Data	No Data	No Data
saturators/coaters	Rating	Е						
	lb/ton shingle	0.004						
Wet Loopers	Standard Deviation	0.004	No Data	No Data	No Data	No Data	No Data	No Data
	Rating	D						

 Table 4-2 Criteria Pollutant Emission Factors – Applicators and Wet Loopers

Source Type	Units	PM-filt	SO 2	тос	тлмос
	lb/ton asphalt				0.069
Coating Tank (asphalt- based factors) ²⁷	Standard Deviation	No Data	No Data	No Data	0.05
	Rating				E
	lb/ton asphalt				0.022
Flux Tank (asphalt- based factors) ²⁸	Standard Deviation	No Data	No Data	No Data	0.02
	Rating				Е
	lb/ton shingle	0.001			
Mixers (shingles-based factors)	Standard Deviation	2E-19	No Data	No Data	No Data
	Rating	С			
	lb/ton asphalt	0.135	0.027	0.049	
Mixers (asphalt-based factors)	Standard Deviation	0.19	0.02	0.04	No Data
	Rating	D	D	Е	

Table 4-3 Criteria Pollutant Emission Factors – Tanks and Mixers

Table 4-4 Criteria	Pollutant Emission	Factors - Cooling	Sections and I	oading Racks
rabie r r orreerra	I offacante minisoron	raccorb dooming	beettonib and i	Journa machio

Source Type	Units	PM-filt	PM- cond	PM ₁₀	PM _{2.5}	SO ₂	СО	NOx	тос	тлмос
Cooling sections (shingles-based factors)	lb/ton shingle	0.024	0.006		0.010				0.004	
	Standard Deviation	0.02	0.01	No Data	N/A	No Data	No Data	No Data	0.004	No Data
	Rating	С	D		Е				С	
	lb/ton asphalt			0.002		0.005	0.0005	0.0003	0.021	0.0014
Loading Racks (asphalt-based factors)	Standard Deviation	No Data	No Data	0.0005	No Data	0.003	0.001	2E-5	0.02	0.0002
	Rating			Е		D	Е	Е	D	Е

Source Type	Units	H ₂ S	HCI	Benzene	
Plow still operating	lb/ton asphalt	0.0006	0.429		
with metal chloride	Standard Deviation	0.0003	0.44	No Data	
catalyst	Rating	С	С		
Plow still operating	lb/ton asphalt		0.014	0.001	
without metal	Standard Deviation	No Data	0.01	0.0003	
chior fue catalyst	Rating		С	Е	
Applicators (shingles-	lb/ton shingle	0.0001		0.0004	
based factors, without RTO or DFTO):	Standard Deviation	4E-5	No Data	N/A	
Coaters	Rating	D		Е	
Applicators (shingles-	lb/ton shingle	0.008			
based factors, with RTO or DFTO):	Standard Deviation	N/A	No Data	No Data	
Coaters	Rating	Е			

Table 4-5 HAP Emission Factor Summary

Tables showing the development of each factor, including number of data points, normality test results, etc., are provided in Appendix A. Additionally, Appendix B provides Q-Q plots for the log-transformed data sets which were determined to not be normally or log-normally distributed using the Anderson Darling test.

²⁷ The emission factor for coating tanks was based on stack testing for tank liquid temperatures ranging from approximately 360 °F to 490 °F.

²⁸ The emission factor for flux tanks was based on stack testing for tank liquid temperatures ranging from approximately 355 °F to 495 °F.

Source	Units	PM-filt	PM-cond	SO ₂	со	NO _x	тос	тлмос	H2S	HCl
Proposed	Proposed EF (lb/ton asphalt) # data points # plants sampled std deviation Proposed EF rating	0.025 22 9 0.02 B	0.038 10 3 0.03 C	0.59 11 2 0.09 C	0.26 12 2 0.20 C	0.07 8 2 0.01 C	0.004 8 2 0.003 C	0.03 4 2 0.03 D	0.0006 9 2 0.0003 C	0.429 7 2 0.44 C
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	 -65% 		 31% 		 		 	 	 87%
Trumbore - 2005	Proposed EF (lb/ton asphalt) ² # data points # plants sampled std deviation Proposed EF rating	0.072 3 0.045 C	 	0.45 2 0.11 D	 	 	 	 	 	0.230 4 0.035 B
AP-42 - 1995	EF (lb/ton asphalt) ³ # plants sampled EF rating				 	 	 			

Table A-1.1: Blow still operating with catalyst - comparison

¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Emission factors for blow still operating with catalyst from Tables 4 and 5 of Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. The Trumbore paper does not clarify whether the PM emission factor is PM-filterable or PM-total (filterable + condensable). Test methods used to develop the factor are not provided. Since the PM factor is compared to the AP-42 factor, which includes filterable only, it is assumed that the PM factor in the Trumbore paper is PM-filterable. The Trumbore paper provides an emission factor for naphthalene which is not considered in this analysis because naphthalene test results were not available.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type. AP-42 Tables 11.2-2 and 11.2-4 provide PM and TOC factors for asphalt blowing with an afterburner. These factors are provided in the "Blow still operating without catalyst" table.

Table A-1.2: Blow still operating with catalyst - factor development

Plant	PM-filt	PM-cond	SO ₂	CO	NO _X	тос	тлмос	H2S	HCI
5 6 8 11 21 26 28 29 40	0.006 0.027 0.023 0.030 0.024 0.010 0.050 0.023 0.032	no data no data no data no data 0.010 no data 0.064 0.040	no data no data no data no data no data no data 0.633 0.542	no data no data no data no data no data no data 0.298 0.213	no data no data no data no data no data no data no data 0.069 0.078	no data no data no data no data no data no data 0.003 0.005	no data no data no data 0.060 no data no data 0.009 no data	no data no data no data no data no data no data 0.000 0.001	no data 0.120 no data no data no data no data 0.739 no data
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.025 Yes 22 22 0 9	0.038 Yes 10 10 0 3	0.587 Yes 13 11 2 2	0.255 Yes 12 12 0 2	0.074 Yes 8 8 0 2	0.004 Yes 9 8 1 2	0.035 Yes 4 0 2	0.001 Yes 9 0 2	0.429 Yes 8 7 1 2
Test Method(s) Used Control Device(s)	5, 5A DFTO, Knockout Tank	202 DFTO	6C DFTO	10 DFTO	7E DFTO	25A DFTO	25A+18 DFTO	15 DFTO	26, 320 DFTO
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴ Is Data Log-Normally Distributed? ⁵ Minimum Maximum Average	0.021 0.06 Yes 0.50 Yes 0.002 0.078 0.028	0.028 0.83 Yes 0.54 Yes 0.010 0.096 0.044	0.094 0.35 Yes 0.38 Yes 0.461 0.781 0.583	0.203 0.16 Yes 0.22 Yes 0.039 0.663 0.255	0.008 0.96 Yes 0.98 Yes 0.061 0.086 0.072	0.003 0.16 Yes 0.40 Yes 0.001 0.008 0.004	0.026 0.07 Yes 0.54 Yes 0.005 0.060 0.022	0.0003 0.04 No 0.11 Yes 0.000 0.001 0.001	0.438 0.29 Yes 0.46 Yes 0.120 1.270 0.650

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Table A-2.1: Blow still operating without catalyst - comparison

Source	Units	PM-filt	PM-cond	PM10 ¹	PM2.5 ¹	SO ₂	со	NO _x	тос	тлмос	HCl	Benzene
Proposed	Proposed EF (lb/ton asphalt) # data points # plants sampled std deviation Proposed EF rating	0.068 95 18 0.09 A	0.028 39 8 0.03 B	0.090 3 1 0.03 E	0.072 3 1 0.03 E	1.074 23 5 0.37 C	0.315 47 8 0.63 B	0.079 21 4 0.05 C	0.025 15 4 0.033 C	0.009 24 4 0.008 C	0.014 6 2 0.01 C	0.001 3 1 0.0003 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	-90% -15% -92%	 	 	 	 19% 	 -55% 	 32% 	-76% -38% -85%	 	 142% 	 -84%
Trumbore - 2005	Proposed EF (lb/ton asphalt) ² # data points # plants sampled std deviation Proposed EF rating	0.08 112 17 0.05 A	 	 	 	0.9 14 11 0.29 A	0.7 22 14 0.58 B	0.06 13 10 0.03 A	0.04 17 13 0.04 A	 	0.0056 3 0.0043 B	0.0033 5 0.0054 B
AP-42 - 1995	EF (lb/ton asphalt) ³ # plants sampled EF rating	0.81 1 D				 	No Data 		0.17 1 D		 	

¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions. ² Emission factors for blow still operating without catalyst from Tables 2 and 3 of Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. The Trumbore paper does not clarify whether the PM emission factor is PM-filterable or PM-total (filterable + condensable). Test methods used to measure the PM results and used to calculate the PM emission factor are not provided. Since the PM factor is compared to the AP-42 factor, which includes filterable only, it is assumed that the PM factor in the Trumbore paper is PM-filterable. The Trumbore paper provides emission factors for other hazardous air pollutants (HAP) which are not considered in this analysis because test results were not available.

³ AP-42 factors from AP-42 Table 11.2-2 and 11.2-4 (1/95) for asphalt blowing, coating asphalt with afterburner. There is a conversion error in the TOC values for Controlled Blow Stills in AP-42, Process SCC 3-05-001-02 for Asphalt Blowing of Coating Asphalt. In Table 11.2-3, the metric emission factor is 0.085 kg/Mg. The English factor is given as 0.017 lb/ton. We have assumed the metric number is correct and in that case, this should be 0.17 lb/ton because of the following analysis: 0.085 kg/Mg x (2,000 lbs/ton)/(1,000 kg/Mg) = 0.17 lb/ton.

Table A-2.2: Blow still operating without catalyst - factor development

Plant	PM-filt	PM-cond	PM10	РМ2.5	SO ₂	СО	NO _X	тос	тимос	HCI	Benzene
1 9 10 13 14 16 17 19 22 23 24 25 27 28 29 30 33 38	0.066 no data 0.021 0.032 0.030 0.046 0.150 0.029 0.300 no data 0.020 0.068 0.038 0.036 0.036 0.030 0.040	0.014 no data 0.023 0.006 no data 0.056 0.018 no data no data	no data no data	no data no data	no data no data no data no data no data 0.708 no data no data no data no data no data no data 1.383 1.490 no data no data	0.001 no data no data no data 0.580 no data 0.001 no data 0.026 no data 0.710 0.330 0.732 no data no data	no data no data no data no data no data no data no data 0.068 no data 0.111 no data no data 0.069 no data	no data 0.025 no data no data data data data data data data data	no data no data	no data no data	no data no data
41 42	0.071 0.127	0.023 no data	0.090 no data	no data no data	0.880 no data	0.140 no data	0.047 no data	no data no data	0.010 no data	0.010 no data	0.001 no data
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.068 Yes 103 95 8 18	0.028 Yes 41 39 2 8	0.090 Yes 3 0 1	0.072 Yes 3 3 0 1	1.074 Yes 24 23 1 5	0.315 Yes 47 47 0 8	0.079 Yes 21 21 0 4	0.025 Yes 16 15 1 4	0.009 Yes 24 24 0 4	0.014 Yes 6 6 0 2	0.001 Yes 3 3 0 1
Test Method(s) Used Control Device(s)	5A DFTO, Knockout Tank RTO/Fume filter	202 DFTO, RTO/Fume filter	201A+202 DFTO	201A+202 DFTO	6, 6C DFTO	10 DFTO	7E DFTO	25A DFTO	25A+18 DFTO	26 DFTO	Not Provided DFTO
Standard Deviation Anderson-Darling Normality Test p-Value - Test Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴ Is Data Log-Normally Distributed? ⁵ Minimum Maximum Average	0.091 7.40E-31 No 0.00094 No 0.000 0.670 0.062	0.030 1.50E-10 No 0.142 Yes 0.005 0.151 0.027	0.029 0.215 Yes 0.160 Yes 0.057 0.112 0.090	0.026 0.565 Yes 0.448 Yes 0.044 0.096 0.072	0.373 0.047 No 0.061 Yes 0.530 1.727 1.151	0.625 6.35E-14 No 0.0003 No 0.000 2.800 0.384	0.052 0.038 No 0.492 Yes 0.024 0.208 0.090	0.033 1.20E-05 No 0.063 Yes 0.000 0.091 0.023	0.008 6.67E-04 No 0.002 No 0.000 0.029 0.008	0.005 0.643 Yes 0.491 Yes 0.007 0.021 0.014	0.0003 0.148 Yes 0.264 Yes 0.000 0.001 0.001

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- PM-Tot. PM-Tot is provided only for Stills – No Cat. In all cases when a PM-Tot value is provided, PM-filt and PM-cond is also provided. However, PM-filt + PM-cond is < PM-Tot in all cases. PM-filt + PM-cond should = PM-tot, since the test methods provided for PM-tot are the same test methods used for PM-filt and PM-cond. As such, separate factors for PM-filt and PM-cond are provided.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

- PM2.5 test results for which Method 201A only is listed. Method 201A provides filterable PM emissions only. PM2.5 and PM10 factors calculated and proposed are filterable + condensable, so only results based on 201A (filterable) and 202 (condensable) are used.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	PM-filt
Proposed	Proposed EF (lb/ton asphalt) # data points # plants sampled std deviation Proposed EF rating	0.011 5 4 0.004 D
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton asphalt) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton asphalt) ³ # plants sampled EF rating	

Table A-3.1: Applicators (asphalt-based factors): Coaters - comparison

¹ PM10 and PM2.5 emission factors, if provided, include filterable

and condensable particulate emissions.

² Fiberglass coater emission factors in lb/ton asphalt are provided in Tables 10 and 11 of Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. However, the paper notes that the factors are for coaters with no post-control. All applicators for which test data was provided for this analysis have post control. Therefore, the Trumbore factors are not comparable and are not included in the table.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-3.2: Applicators (asphalt-based factors):	Coaters - factor development
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Plant	PM-filt
3	0.015
18	0.005
34	0.014
37	0.010
Calculated Emission Factor ¹	0.011
Propose Factor? ²	Yes
# data points available	6
# data points used	5
# data points excluded ³	1
# plants sampled based on data used	4
Test Method(s) Used Control Device(s)	5A Fume Filter, Cartridge Filter
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.004 0.580 Yes 0.227
Is Data Log-Normally Distributed? ⁵	Yes
Minimum	0.005
Maximum	0.016
Average	0.012

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	PM-filt	PM-cond	PM2.5 ¹	SO ₂	со	тос	тлмос	H2S	Benzene
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.005 199 18 0.01 A	0.002 32 8 0.001 B	0.001 2 1 0.0001 E	0.002 12 3 0.004 C	0.005 15 3 0.003 C	0.024 6 1 0.005 D	0.052 9 2 0.02 C	0.0001 6 1 4E-05 D	0.0004 2 1 0.00 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	 	 	 	 	 	 	 	 	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	 	 	 	 		 	 		
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	 	 	 	 	 	 	 	 	

Table A-4.1: Applicators (shingles-based factors, without RTO or DFTO): Coaters - comparison

 $^1\,$ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Fiberglass coater emission factors in lb/ton asphalt are provided in Tables 10 and 11 of Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. However, the paper notes that the factors are for coaters with no post-control. All applicators for which test data was provided for this analysis have post control. Therefore, the Trumbore factors are not comparable and are not included in the table.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-4.2: Applicators (shingles-based factors, without RTO or DFTO): Coaters - factor development

Plant	PM-filt	PM-cond	PM2.5	SO ₂	со	тос	TNMOC	H2S	Benzene
1 2 4 10 13 16 17 20 28 29 30 31 32 33 35 36	0.006 0.002 0.002 0.003 0.003 0.001 0.003 0.002 0.018 0.003 0.010 0.004 0.001 0.002 0.000	no data 0.001 no data 0.001 no data 0.001 no data 0.002 no data no data no data 0.003 no data	no data no data	no data no data no data 0.004 no data 0.001 no data no data no data no data no data no data no data no data	no data no data no data 0.006 0.004 no data no data no data no data no data no data no data no data no data no data	no data no data	no data no data no data 0.039 0.065 no data no data	no data no data no data 0.000 no data no data	no data no data
41 43	0.020 0.003	0.003 no data	no data no data	no data no data	no data no data	no data no data	no data no data	no data no data	no data no data
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.005 Yes 200 199 1 18	0.002 Yes 33 32 1 8	0.001 Yes 2 2 0 1	0.002 Yes 12 12 0 3	0.005 Yes 15 15 0 3	0.024 Yes 6 6 0 1	0.052 Yes 9 0 2	0.0001 Yes 6 6 0 1	0.00042 Yes 3 2 1 1
Test Method(s) Used Control Device(s)	5A Fume Filter	202 Fume Filter	201A+202 Fume Filter	6, 6C Fume Filter	10 Fume Filter	25A Fume Filter	25A+18 Fume Filter	15 Fume Filter	Not Provided Fume Filter
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴ Is Data Log-Normally Distributed? ⁵ Minimum Maximum Average	0.012 0.00E+00 No 3.50E-09 No 0.000 0.086 0.005	0.001 0.001 No 0.061 Yes 0.000 0.004 0.002	0.000 N/A - two data points N/A N/A - two data points N/A 0.001 0.001	0.004 1.44E-06 No 0.014 No 0.000 0.013 0.002	0.003 0.238 Yes 0.793 Yes 0.001 0.012 0.005	0.005 0.485 Yes 0.611 Yes 0.019 0.031 0.024	0.021 0.014 No 0.005 No 0.019 0.067 0.047	0.00004 0.007 No 0.007 No 0.000 0.000 0.000	0.000 N/A - two data points N/A N/A - two data points N/A 0.000 0.000 0.000

¹ Units for emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

- PM2.5 test results for which test method 201A only is listed. Method 201A provides filterable PM emissions only. PM2.5 and PM10 factors calculated and proposed are filterable + condensable, so only results based on 201A (filterable) and 202 (condensable) are used.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-

transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	PM-filt	PM-cond	PM2.5 ¹	SO ₂	со	тос	ТNMOC	H2S
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.004 31 3 0.004 C	0.001 19 2 0.0003 C	0.001 6 1 0.0002 D	0.005 2 1 0.00006 E	0.010 6 2 0.007 C	0.014 2 1 0.00 E	0.003 4 2 0.004 D	0.008 3 1 0.00 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	 	 	 	 	 	 	 	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	 	 	 	 	 	 	 	
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	 	 	 	 	 	 	 	

Table A-5.1: Applicators (shingles-based factors, with RTO or DFTO): Coaters - comparison

 $^1\,$ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Fiberglass coater emission factors in lb/ton asphalt are provided in Tables 10 and 11 of Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. However, the paper notes that the factors are for coaters with no post-control. All applicators for which test data was provided for this analysis have post control. Therefore, the Trumbore factors are not comparable and are not included in the table.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Plant	PM-filt	PM-cond	PM2.5	SO ₂	СО	тос	TNMOC	H2S
4 9 22 24 40	0.009 no data 0.000 no data 0.002	no data no data 0.000 no data 0.001	no data no data 0.001 no data no data	no data no data no data no data 0.005	no data no data no data 0.004 0.016	no data no data no data no data 0.014	no data 0.002 no data 0.004 no data	no data no data no data no data 0.008
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.004 Yes 31 31 0 3	0.001 Yes 19 19 0 2	0.001 Yes 6 6 0 1	0.005 Yes 3 2 1 1	0.010 Yes 6 6 0 2	0.014 Yes 3 2 1 1	0.003 Yes 4 0 2	0.008 Yes 3 0 1
Test Method(s) Used Control Device(s)	5A RTO/Fume Filter	202 RTO/Fume Filter	201A+202 RTO/Fume Filter	6C RTO/Fume Filter	10 RTO, Fume Filter	25A RTO/Fume Filter	25A+18 RTO	15 RTO/Fume Filter
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵	0.004 8.43E-13 No	0.000 0.018 No	0.000 0.537 Yes	0.000 N/A - two data points N/A	0.007 0.025 No	0.000 N/A - two data points N/A	0.004 0.064 Yes	0.000 N/A N/A
Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.012	0.039	0.601	N/A - two data points	0.017	N/A - two data points	0.096	N/A
Is Data Log-Normally Distributed? ⁵ Minimum Maximum Average	No 0.000 0.010 0.002	No 0.000 0.001 0.000	Yes 0.001 0.001 0.001	N/A 0.005 0.005 0.005	No 0.004 0.017 0.010	N/A 0.014 0.014 0.014	Yes 0.001 0.010 0.003	N/A 0.008 0.008 0.008

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Table A-5.2: Applicators	(sningles-based factors,	, with KIU or DFIU):	Coaters -	· factor develo	pment

¹ Units for emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.
 ⁵ Data is normally / log-normally distributed if the corresponding p-value is greater than 0.05.

Source	Units	PM-filt
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.036 107 4 0.04 C
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	

Table A-6.1: Applicators (shingles-based factors, without RTO or DFTO): Saturators - comparison

 PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.
 ² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-6.2: Applicators (shingles-based factors, without RTO or DFTO): Saturators - factor development

Plant	PM-filt
4	0.028
30	0.045
31	0.037
43	0.033
Calculated Emission Factor ¹	0.036
Propose Factor? ²	Yes
# data points available	107
# data points used	107
# data points excluded ³	0
# plants sampled based on data used	4
Test Method(s) Used	5A
Control Device(s)	Fume Filter
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.036 1.77E-21 No 0.117
Is Data Log-Normally Distributed? ⁵	Yes
Minimum	0.002
Maximum	0.190
Average	0.034

¹ Units for all emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	PM-filt
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.004 3 1 0.002 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	

Table A-7.1: Applicators (shingles-based factors, with RTO or DFTO): Saturators - comparison

 PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.
 ² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-7.2: Applicators (shingles-based factors, with RTO or DFTO): Saturators - factor development

Plant	PM-filt
28	0.004
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.004 Yes 3 3 0 1
Test Method(s) Used	5A
Control Device(s)	DFTO
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴	0.002 4.87E-01
Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	Yes 0.582
Is Data Log-Normally Distributed? ⁵ Minimum Maximum Average	Yes 0.003 0.006 0.004

¹ Units for all emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	PM-filt
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.005 6 1 0.003 D
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	

¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type.
 ³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-8.2: Applicators (shingles-based factors, without RTO or DFTO): Other Coaters/Saturators - factor development

Plant	PM-filt
31	0.005
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.005 Yes 6 0 1
Test Method(s) Used	5A
Control Device(s)	Fume Filte
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵	0.003 0.53 Yes
Anderson-Darling Normality Test p-Value -	0.55
Is Data Log-Normally Distributed? ⁵	Vac

¹ Units for all emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Table A-9.1: Applicators (shingles-based factors, with RTO or DFTO)	: Other Coaters/Saturators - comparison
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Source	Units	PM-filt
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.054 2 1 0.03 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	

 $^1\,$ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-9.2: Applicators (shingles-based factors, with RTO or DFTO): Other Coaters/Saturators - factor development

Plant	PM-filt
4	0.054
Calculated Emission Factor ¹	0.054
Propose Factor? ²	Yes
# data points available	2
# data points used	2
# data points excluded ³	0
# plants sampled based on data used	1
Test Method(s) Used	5A
Control Device(s)	RTO
Standard Deviation	0.025
Anderson-Darling Normality Test p-Value - Test	N/A - two
Results ⁴	data points
Is Data Normally Distributed? ⁵	N/A
Anderson-Darling Normality Test p-Value -	N/A - two
LN(Test Results) ⁴	data points
Is Data Log-Normally Distributed? ⁵	N/A
Minimum	0.036
Maximum	0.072
Average	0.054

¹ Units for all emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Table A-10.1: Wet loopers - comparison

Source	Units	PM-filt
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.004 9 1 0.004 D
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	

 ¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.
 ² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-10.2:	Wet loopers	- factor	develo	pment

Plant	PM-filt
28	0.004
Calculated Emission Factor ¹	0.004
Propose Factor? ²	Yes
# data points available	9
# data points used	9
# data points excluded ³	0
# plants sampled based on data used	1
Test Method(s) Used	5A
Control Device(s)	Fume Filter
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.004 0.013 No 0.121
Is Data Log-Normally Distributed? ⁵	Yes
Minimum	0.001
Maximum	0.010
Average	0.004

¹ Units for all emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	тлмос
Proposed	Proposed EF (lb/ton asphalt) # data points # plants sampled std deviation Proposed EF rating	0.069 4 1 0.05 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton asphalt) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton asphalt) ³ # plants sampled EF rating	

Table A-11.1: Coating Tanks (asphalt-based factors) - comparison

¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Factors for uncontrolled emissions from oxidized asphalt storage tanks, in lb/ton asphalt from Table 8 of Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. The Trumbore paper does not clarify whether the PM emission factor is PM-filterable or PM-total (filterable + condensable). Test methods used to measure the PM results used to calculate the PM emission factor are not provided. Since the PM factor is compared to the AP-42 factor, which includes filterable only, it is assumed that the PM factor in the Trumbore paper is PM-filterable. The Trumbore paper provides emission factors for formaldehyde and carbonyl sulfide which are not considered in this analysis because test results for these pollutants were not available.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type on a lb/ton of asphalt basis.

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Table A-11.2: U0a	iung Tanks tasona	ait-dased factors i	 ractor deven 	onnent

Plant	тлмос
19	0.069
Calculated Emission Factor ¹	0.069
Propose Factor? ²	Yes
# data points available	4
# data points used	4
# data points excluded ³	0
# plants sampled based on data used	1
Test Method(s) Used	25A+18
Control Device(s)	None
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.054 0.618 Yes 0.584
Is Data Log-Normally Distributed? ⁵	Yes
Minimum	0.014
Maximum	0.132
Average	0.069

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Table A-12.1: Flux tank - comparison

Source	Units	TNMOC
Proposed	Proposed EF (lb/ton asphalt) # data points # plants sampled std deviation Proposed EF rating	0.022 4 1 0.02 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton asphalt) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton asphalt) ³ # plants sampled EF rating	

¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.
 ² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-12.2:	Flux tank -	factor develo	pment
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Plant	тлмос
19	0.022
Calculated Emission Factor ¹	0.022
Propose Factor? ²	Yes
# data points available	4
# data points used	4
# data points excluded ³	0
# plants sampled based on data used	1
Test Method(s) Used	25A+18
Control Device(s)	None
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.023 0.025 No 0.127
Is Data Log-Normally Distributed? ⁵	Yes
Minimum	0.008
Maximum	0.056
Average	0.022

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	PM-filt
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.001 11 2 2E-19 C
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating	
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	

Table A-13.1: Mixers (shingles-based factors) - comparison

¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 provides factors in lb/ton asphalt for uncontrolled emissions from oxidized asphalt storage tanks.
 ³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Plant	PM-filt
31	0.001
32	0.001
Calculated Emission Factor ¹	0.001
Propose Factor? ²	Yes
# data points available	12
# data points used	11
# data points excluded ³	1
# plants sampled based on data used	2
Test Method(s) Used	5A
Control Device(s)	Fume Filter
Standard Deviation	0.000
Anderson-Darling Normality Test p-Value - Test	N/A - two
Results ⁴	data points
Is Data Normally Distributed? ⁵	N/A
Anderson-Darling Normality Test p-Value -	N/A - two
LN(Test Results) ⁴	data points
Is Data Log-Normally Distributed? ⁵	N/A
Minimum	0.001
Maximum	0.001
Average	0.001

Table A-13.2: Mixers (shingles-based factors) - factor development

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Table A-14.1: Mixers (asphalt-based factors) - comparison

Source	Units	PM-filt	SO ₂	тос
Proposed	Proposed EF (lb/ton asphalt) # data points # plants sampled std deviation Proposed EF rating	0.135 2 2 0.19 D	0.027 3 2 0.02 D	0.049 4 1 0.04 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019		 	
Trumbore - 2005	Proposed EF (lb/ton asphalt) ² # data points # plants sampled std deviation Proposed EF rating	 	 	
AP-42 - 1995	EF (lb/ton asphalt) ³ # plants sampled EF rating	 		

 $^1\,$ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Factors for uncontrolled emissions from oxidized asphalt storage tanks, in lb/ton asphalt from Table 8 of Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278. The Trumbore paper does not clarify whether the PM emission factor is PM-filterable or PM-total (filterable + condensable). Test methods used to measure the PM results used to calculate the PM emission factor are not provided. Since the PM factor is compared to the AP-42 factor, which includes filterable only, it is assumed that the PM factor in the Trumbore paper is PM-filterable. The Trumbore paper provides emission factors for formaldehyde and carbonyl sulfide which are not considered in this analysis because test results for these pollutants were not available.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type on a lb/ton of asphalt basis.

Table A-14.2: Mixers (asphalt-based factors) - factor development

Plant	PM-filt	SO ₂	тос
12 39	0.270 0.000	0.018 0.037	no data 0.049
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.135 Yes 2 2 0 2	0.027 Yes 3 0 2	0.049 Yes 4 4 0 1
Test Method(s) Used Control Device(s)	5A Scrubber, Fume Filter/Cartri dge Filter	6C, 15/16 Scrubber, Fume Filter	25A Fume Filter
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴ Is Data Log-Normally Distributed? ⁵ Minimum Maximum Average	0.191 N/A - two data points N/A N/A - two data points N/A 0.000 0.270 0.135	0.018 0.150 Yes 0.251 Yes 0.018 0.051 0.030	0.040 0.436 Yes 0.496 Yes 0.012 0.096 0.049

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Source	Units	PM-filt	PM-cond	PM2.5 ¹	тос
Proposed	Proposed EF (lb/ton shingles) # data points # plants sampled std deviation Proposed EF rating	0.024 27 3 0.02 C	0.006 8 1 0.01 D	0.010 4 1 N/A E	0.004 21 2 0.004 C
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019				
Trumbore - 2005	Proposed EF (lb/ton shingles) ² # data points # plants sampled std deviation Proposed EF rating				
AP-42 - 1995	EF (lb/ton shingles) ³ # plants sampled EF rating	 	 	 	

Table A-15.1: Cooling sections	(shingles-based factors) - comparison
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¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.

² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress, Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type.

³ AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Plant	PM-filt	PM-cond	PM2.5	тос
22	0.021	0.006	0.010	no data
31	0.018	no data	no data	0.003
33	0.033	no data	no data	0.006
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.024 Yes 27 27 0 3	0.006 Yes 8 8 0 1	0.010 Yes 4 0 1	0.004 Yes 21 21 0 2
Test Method(s) Used	5A	202	201A+202	25A
Control Device(s)	None	None	None	None
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.016 0.014 No 0.156	0.006 0.040 No 0.374	N/A 0.615 Yes 0.613	0.004 8.28E-04 No 9.28E-04
Is Data Log-Normally Distributed? ⁵	Yes	Yes	Yes	No
Minimum	0.01	0.00	0.00	0.00
Maximum	0.07	0.02	0.02	0.01
Average	0.02	0.01	0.01	0.00

Table A-15.2: Cooling sections	(shingles-based factors)	- factor development
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¹ Units for all emission factors are lb/ton shingles.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here: https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

Table A-16.1: Loading	racks - comparison
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Source	Units	PM10 ¹	SO ₂	со	NO _x	тос	тлмос
Proposed	Proposed EF (lb/ton asphalt) # data points # plants sampled std deviation Proposed EF rating	0.002 3 1 0.0005 E	0.005 6 1 0.003 D	0.0005 3 1 0.001 E	0.0003 2 1 2E-05 E	0.021 6 1 0.02 D	0.0014 3 1 0.0002 E
Change in Factors	Change from 1995 to 2005 Change from 2005 to 2019 Change from 1995 to 2019	 	 	 	 	 	
Trumbore - 2005	Proposed EF (lb/ton asphalt) ² # data points # plants sampled std deviation Proposed EF rating		 	 	 	 	
AP-42 - 1995	EF (lb/ton asphalt) ³ # plants sampled EF rating		 	 	 	 	

¹ PM10 and PM2.5 emission factors, if provided, include filterable and condensable particulate emissions.
 ² Trumbore, et. al., "Emission Factors for Asphalt-Related Emissions in Roofing Manufacturing," Environmental Progress,

Volume 24, Issue 3, October 2005, pp. 268-278 does not provide emission factors for this source type. 3

AP-42 Table 11.2-2 (1/95) does not provide emission factors for this source type.

Table A-16.2: Loading racks - factor dev	velopment
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Plant	PM10	SO ₂	СО	NO _x	тос	TNMOC
16	0.002	0.005	0.001	0.000	0.021	0.001
Calculated Emission Factor ¹ Propose Factor? ² # data points available # data points used # data points excluded ³ # plants sampled based on data used	0.002 Yes 3 3 0 1	0.005 Yes 6 6 0 1	0.001 Yes 3 3 0 1	0.0003 Yes 3 2 1 1	0.021 Yes 6 6 0 1	0.0014 Yes 3 3 0 1
Test Method(s) Used Control Device(s)	201A+202 RTO/Fume Filter	6C RTO/Fume Filter	10 RTO/Fume Filter	7E RTO/Fume Filter	25A RTO/Fume Filter	25A+18 RTO/Fume Filter
Standard Deviation Anderson-Darling Normality Test p-Value - Test Results ⁴ Is Data Normally Distributed? ⁵ Anderson-Darling Normality Test p-Value - LN(Test Results) ⁴	0.000 0.487 Yes 0.373	0.003 0.874 Yes 0.481	0.001 0.068 Yes 0.122	0.000 N/A - two data points N/A N/A - two data points	0.018 0.097 Yes 0.059	0.000 0.269 Yes 0.303
Is Data Log-Normally Distributed? ⁵ Minimum Maximum Average	Yes 0.001 0.002 0.002	Yes 0.001 0.009 0.005	Yes 0.000 0.001 0.001	N/A 0.000 0.000 0.000	Yes 0.005 0.044 0.021	Yes 0.001 0.002 0.001

¹ Units for all emission factors are lb/ton asphalt.

² A factor is not proposed for the following:

- Any pollutants which have no test results.

- Any pollutants which have only one test result. Sufficient data to calculate these factors is not available.

³ Data points are excluded for the following reasons:

- Test result identified as an outlier in accordance with Rosner's Outlier Test (for data sets containing greater than 24 results) or Dixon's Outlier Test (for data sets containing less than or equal to 24 results).

- Test result is blank or zero.

⁴ SPC for Excel Anderson Darling test spreadsheet (June 2011), developed by BPI Consulting, LLC is used to calculate a p-value for each data set and log-transformed data set. Spreadsheet available here:

https://www.spcforexcel.com/knowledge/basic-statistics/anderson-darling-test-for-normality.

APPENDIX B: Q-Q PLOTS FOR NON-NORMALLY OR NON-LOG-NORMALLY DISTRIBUTED DATA SETS





Applicators (shingles-based factors, with RTO or DFTO): Conters LN(PM-filt) N = 31 Mean = -7.382

Sd = 1.726 Slope = 1.706 Intercept = -7.382 Correlation, R = 0.962

Applicators (shingles-based factors, with RTO or DFTO): Coaters LN(PM-cond)

- N = 19 Mean = -8.791 Sd = 1.555
- Slope = 1,547
- Intercept = -8.791
- Correlation, R = 0.957

Applicators (shingles-based factors, with RTO or DFTO): Conters LN(CO)

- N = 6 Mean = -4.906 Sd = 0.757
- Slope = 0.722
- Intercept = -4.806
- Correlation, R = 0.874

Best Fit Line



Applicators (shingles-based factors, without RTO or DFTO): Conters LN(PM-fit) N = 199 Mean = -6.374 Sd = 1.355 Slope = 1.329 Intercept = -6.374 Correlation, R = 0.975

Applicators (shingles-based factors, without RTO or DFTO): Costers LN(SO2)

N = 12 Mean = -7.128 Sd = 1.432 Slope = 1.387 Intercept = -7.128 Correlation, R = 0.918

Applicators (shingles-based factors, without RTO or DFTO): Costers LN(TNMOC)

N = 9 Mean = -3.17 Sd = 0.554 Slope = 0.522 Intercept = -3.17 Correlation, R = 0.881

Applicators (shingles-based factors, without RTO or DFTO): Conters LN(H2S)

N = 6 Mean = -8.809 Sd = 0.27 Slape = 0.25 Intercept = -8.809 Carrelation, R = 0.848

Best Fit Line



The test data in Table C-1 were excluded from the emission factor development calculations as they were the only data available for a given source type and pollutant.

Source Type	Units	Pollutant	Stack Testing Result	
		PM10	0.034	
		PM _{2.5}	0.011	
Blowstills Operating	lh /ton conholt	1,3-Butadiene	5.9E-6	
with Catalyst	ib/ton asphalt	Benzene	3.0E-4	
		Chlorine	0.31	
		Formaldehyde	1.0E-4	
Applicators (shingles- based factors, without RTO or DFTO): Laminators	lb/ton shingle	PM-filt	3.0E-3	
Applicators (asphalt- based factors, without RTO or DFTO): Other Saturators/Coaters	lb/ton asphalt	PM-filt	5.2E-3	
		Carbonyl sulfide	0.011	
Mixers (asphalt-based factors)	lb/ton asphalt	Dimethyl disulfide	4.8E-3	
		Dimethyl sulfide	0.013	
		Methyl mercaptan	8.5E-3	
		H_2S	6.0E-3	
		PM-filt	0.063	
Cooling Sections	lh/ton asphalt	PM10	0.042	
(asphalt-based factors)	io, ton aspirate	PM _{2.5}	0.034	
		TNMOC	0.041	

APPENDIX D: LIST OF ACRONYMS

AP-42	<i>Volume I, Stationary Point and Area Sources,</i> or the <i>Compilation of Air Pollutant Emission Factors</i>
ARMA	Asphalt Roofing Manufacturers Association
cfm	cubic feet per minute
CO	Carbon Monoxide
DFTO	Direct-fired Thermal Oxidzer
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
H_2S	Hydrogen Sulfide
HAPs	Hazardous Air Pollutants
HCl	Hydrochloric Acid
HEAF	High Efficiency Air Filters
lb/hr	pounds per hour
lb/ton asphalt	pounds of emissions per short ton of asphalt throughput
lb/ton shingles	pounds of emissions per short ton of shingle production
mg/dscfm	milligram per dry standard cubic feet per minute
NO _X	Nitrogen Oxides
PM ₁₀	Particulate Matter with an Aerodynamic Diameter Less Than 10 microns
PM _{2.5}	Particulate Matter with an Aerodynamic Diameter Less Than 2.5 microns
РМ	Particulate Matter
PM-cond	Condensable Particulate Matter
PM-filt	Filterable Particulate Matter
PM-tot	Total Particulate Matter
RTO	Regenerative Thermal Oxidizer
SO ₂	Sulfuric Dioxide
TNMOC	Total Non-Methane Organic Compounds
ТОС	Total Organic Compounds
VOC	Volatile Organic Compounds