



**ARMA Health, Safety,  
and Environment Committee**

**ARMA Board of Directors Meeting  
May 13, 2009**

**Chairman: Bob Hockman  
TAMKO Building Products, Inc.**



## Discussion Topics

1. Post Consumer Shingle Recycling
2. Asphalt Shingle Tear-off Exposure Assessment
3. PM 2.5 Testing Method Verification Project
4. Generally Achievable Control Technology (GACT)
5. Litigation Challenging the Asphalt Roofing and Glass Mat MACTs.
6. Web format HSE meeting.



## Post Consumer Shingle Recycling

At the November 2008 meeting, the Board of Directors agreed to allow ARMA to:

1. Support efforts to increase of recycling post consumer shingle tear-offs.
2. Monitor developments for ARMA members and share useful information with key groups.
3. \$7,500 for support of the next shingle recycling forum and \$2,500 for support of

[www.shinglerecycling.org](http://www.shinglerecycling.org).



## Post Consumer Shingle Recycling

The 4th Asphalt Shingle Recycling Forum will be held in Chicago on November 5-6, 2009.

- ARMA is a primary sponsor and will participate in the conference.



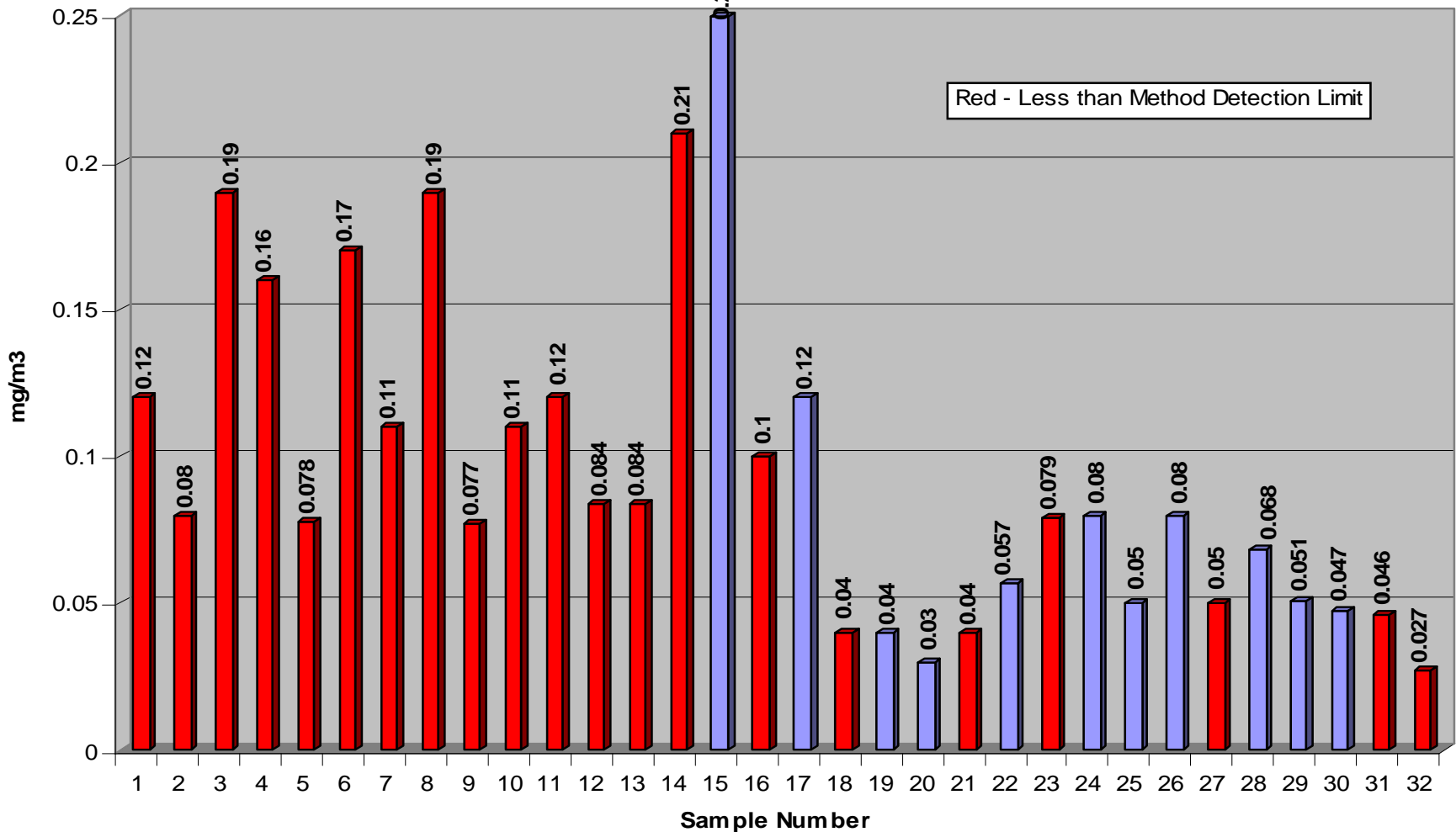
# Asphalt Shingle Tear-Off Exposure Assessment

Personal exposure samples collected during tear-off activities on roofs in Houston and Denver.

- All NIOSH Method 5042 results are below ACGIH TLV of 0.5 mg/m<sup>3</sup>.



## Draft Results for Tear-off Exposure Measurements Benzene Soluble Particulate Matter (mg/m<sup>3</sup>)





## **PM 2.5 Testing Methods Evaluation**

**Project designed to test USEPA proposed sampling methods on roofing industry sources:**

- ARMA developed test protocol for project.
  - Test protocol was not implemented by consultant (MACTEC).
  - Results were invalid as a result of MACTEC actions.
- ☛ **ARMA notified MACTEC on February 11, 2009 that no report should be written and that ARMA would not pay any more money for work.**



# **USEPA Roofing Manufacturing Area Source Regulation – GACT**

**ARMA has advocated, to EPA, using NSPS subpart UU as regulatory format for roofing industry Area Sources.**

- August 2008 - EPA proposed regulation mostly based on subpart UU requirements.
- However, EPA included emissions limits that would immediately cause multiple roofing manufacturing facilities to be in violation of the standard.
- February 9, 2009 official comments sent on draft data developed by EPA.





# USEPA Roofing Manufacturing Area Source Regulation – GACT Comment Letter to EPA

## ARMA pointed out that:

- ☛ GACT standard as proposed would immediately cause multiple roofing facilities to be in noncompliance.
- ☛ EPA had based standard on MACT data - top 12% of the industry.
- ☛ GACT was supposed to be based on “Generally Available” not top 12%.
- ☛ EPA was correct in not including Title V Permit requirements in the standard.



# USEPA Roofing Manufacturing Area Source Regulation – GACT Comment Letter to EPA

## ARMA also recommended that:

- Separate requirements be established for asphalt roofing lines that do not include a saturator, asphalt roofing lines that include a saturator, and stand-alone saturators producing saturated felt.
- Roofing facility should be allowed the option to separately measure the emissions from units that are not “affected sources” under the GACT standards, and subtract them from the total for the facility.



# **USEPA Roofing Manufacturing Area Source Regulation – GACT Comment Letter to EPA**

In the event of an unplanned malfunction of an emission control system, a facility should be allowed up to 9 hours operating time to return the emissions control system to operation.

For this time period, an uncontrolled emissions factor should be used to represent emissions for regulatory requirements.

Still unclear what EPA will require for Startup, Shutdown, Malfunction related time periods.



# USEPA Roofing Manufacturing Area Source Regulation – GACT

- EPA implementation date is targeted for July 1, 2009. ARMA will get the opportunity to review and comment during 30 day public comment period.



## **USEPA Asphalt Roofing and Glass Mat Manufacturing MACTS**

- Several environmental groups have filed litigation challenging 38 MACTS finalized by Bush EPA.
- Both the Asphalt Roofing and Glass Mat Manufacturing MACTs are included in the litigation.



## Web Based HSE Committee Meeting

For Spring Committee meeting, HSE met via web/telephone conference. Meeting was attended by 40 ARMA member representatives.

- ARMA HSE is evaluating ways to build on this successful format.



# Industry Asphalt Fume Efforts

Why this is important?

