



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

SENT VIA ELECTRONIC MAIL

Steven Crew
President
Warrior Roofing Manufacturing, Inc.
3050 Warrior Road
Tuscaloosa, AL 35404
Steven@warriorroofing.net

Re: Information and Sampling Request Pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7414(a)

Dear Mr. Crew,

Pursuant to Section 114(a)(1) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a)(1), you are hereby required to provide the U.S. Environmental Protection Agency with information relating to Warrior Roofing Manufacturing, Inc. (Warrior). This information is needed to determine whether Warrior's facilities are in compliance with requirements of the Act and its implementing regulations. Section 114(a) of the Act, 42 U.S.C. § 7414(a), authorizes the Administrator of the EPA to require any person who owns or operates an emission source, whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the Act, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the Act. This authority has been duly delegated to the Chief of the Stationary Source Branch, Air Enforcement Division, Office of Civil Enforcement, Office of Enforcement and Compliance Assurance.

Please review and follow the instructions in and, where required, complete the following enclosures: Instructions (Enclosure 1), Definitions (Enclosure 2), Confidential Business Information (CBI) Assertion and Substantiation Requirements (Enclosure 3), Information Request (Enclosure 4), and Statement of Certification (Enclosure 5).

The requested information shall be submitted to the EPA electronically, per the instructions in Enclosure 1. The responses shall be submitted **no later than forty-five (45) calendar days** after Warrior's receipt of this letter as determined by the date of the EPA's electronic mail transmitting this request, unless the EPA, for good cause shown, extends in writing the deadline for responding to this request. This information must be submitted electronically to the Rosalyn Hughes Fairley at Hughes-Fairley.Rosalyn@epa.gov and Bruce Augustine at Augustine.Bruce@epa.gov.

Failure to provide the information required by this letter is a violation of the Act and may result in one or more of the following actions: (1) issuance of an order requiring compliance with this request; (2) issuance of an administrative penalty order pursuant to Section 113(d) of the Act, 42 U.S.C. § 7413(d); (3) commencement of a civil action in accordance with Section 113(b) of the Act, 42 U.S.C. § 7413(b); and/or (4) any other action authorized under the Act.

Under Section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to the regulations found at 40 C.F.R. Part 2, Subpart B, including 40 C.F.R. § 2.301, you are entitled to assert a claim of business confidentiality for any information you provide to the EPA that involves trade secrets and which Warrior regards as confidential business information (CBI). For such information, you may request that the EPA treat such information as confidential. Any such claim of confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). Note that “emission data,” as defined by 40 C.F.R. § 2.301(a)(2), cannot be claimed as confidential under Section 114(c) of the Act, 42 U.S.C. § 7414(c). For detailed instructions for claiming confidentiality, please see Enclosure 3. Information you supply under a claim of confidentiality will be treated in accordance with 40 C.F.R. Part 2, Subpart B, and will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to Warrior. Please note that any confidentiality claim does not obviate the need to send that portion of the response to the EPA.

The response to the information requested must be accompanied by Enclosure 5, Statement of Certification, which is to be signed and dated by a responsible official of Warrior. This statement certifies that the response submitted to the EPA is complete and contains all documents and information responsive to this request that are known to you, following a complete and thorough review of all information and sources available to you.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 – 3520, because it seeks information from specific individuals or entities as part of an investigation.

If you have any questions regarding this matter, please contact Rosalyn Hughes Fairley at (404) 562-9206 or Hughes-Fairley.Rosalyn@epa.gov or Bruce Augustine at (215) 814-2131 or Augustine.Bruce@epa.gov. Alternatively, legal counsel for Warrior may contact Kristin Terry at (202) 564-4479 or Terry.Kristin@epa.gov.

Sincerely,

**GREGORY
FRIED**

Digitally signed by GREGORY FRIED
Date: 2023.03.30 09:39:44 -04'00'

Gregory Fried, Chief
Stationary Source Enforcement Branch
Air Enforcement Division

Enclosures

cc: Paul Arnold, EPA Region 3 (arnold.paul@epa.gov)
Kristen Hall, EPA Region 3 (hall.kristen@epa.gov)
Todd Russo, EPA Region 4 (russo.todd@epa.gov)
Ron Gore, ADEM (rwg@adem.alabama.gov)
Doug Carr, ADEM (dkc@adem.alabama.gov)
James W. Thornhill, ADEM (jwt@adem.alabama.gov)
Kelly Matty, PADEP South Central Office (kmatty@pa.gov)
Susan Foster, PADEP Central Office (sufoster@pa.gov)

ENCLOSURE 1

Instructions

Each of the following instructions applies to each and every Request contained in Enclosure 4.

1. Provide a separate response to each and every Request, and each and every subpart of a Request.
2. If the company has no responsive information or documents pertaining to a particular Request, submit an affirmative statement and explanation.
3. Indicate on each document produced, or in some other reasonable manner, the number of the Request to which it corresponds. If a document is responsive to more than one Request, this must be so indicated and only one (1) version of the document needs to be provided.
4. The company shall submit documents in Portable Document Format (PDF) or in any other electronic format as specified in Enclosure 4. Do not create separate PDF files for each page of a single document.
5. Where a Request requires the submission of an electronic spreadsheet, please provide the spreadsheet as an unlocked, Microsoft Excel file. If Excel format is not available, then the format should allow for data to be imported and used in calculations by a standard spreadsheet program such as Microsoft Excel.
6. Identify each person whom you relied on or consulted with in preparing your responses to each Request. Provide their name, title, job duties and duration of employment with the company. If they are not an employee of the company, identify their employer and provide their name, title, job duties and duration of employment with their employer.
7. If requested information or documents are not known or are not available to you at the time of your response to this information request, but later become known or available to you, you must supplement your response to the EPA within 30 calendar days of discovery of the responsive information. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete or misrepresents the facts, you must provide the EPA with a corrected response as soon as possible.
8. Please submit your response to this information request to the EPA electronically. You may submit your response using either of the following options: (A) As an attachment sent via email to Rosalyn Hughes Fairley at Hughes-Fairley.Rosalyn@epa.gov and Bruce Augustine at Augustine.Bruce@epa.gov; or (B) by requesting a link from the EPA for a secure file transfer site where you may upload your response. You may request a link by sending an email to Ms. Hughes Fairley and/or Mr. Augustine.
9. Please do not submit compressed files (.zip) via email. If you wish to submit compressed files, please select option B.
10. Please do not send documents that you have claimed as confidential business information (CBI) to

the EPA by email (option A). If you are submitting documents that you have claimed as CBI, please upload them to the EPA's secure file transfer site (option B).

11. Prior to submitting your response, please send an email to Rosalyn Hughes Fairley at Hughes-Fairley.Rosalyn@epa.gov and Bruce Augustine at Augustine.Bruce@epa.gov indicating which option or combination of options (A and/or B) you have selected to submit your response to this request.

ENCLOSURE 2

Definitions

1. The terms **“document”** and **“writing”** and the plural forms thereof shall mean all written, recorded, or graphic matters, however produced or reproduced, of every kind and description, pertaining in any way to the subject matter of this request, and which are in the company’s possession, custody, or control or to which the company has or has had access. The terms **“document”** and **“writing”** shall include, but are not limited to: any receipts; invoices; shipping records; purchase orders; purchase records; books; pamphlets; periodicals; memoranda (including those of telephone or oral conversations); contracts; correspondence; agreements; applications; financial records; security instruments; disbursements; checks; bank statements; time records; accounting or financial records; notes; diaries; logs; facsimiles (faxes); telegrams or cables prepared, drafted, received, or sent; electronic mail (email), whether drafted, received, or sent; tapes; transcripts; recordings; minutes and notes of meetings; directives; work papers; charts; drawings; prints; flow sheets; photographs; infrared camera recordings; film; computer printouts; x-ray photographs; advertisements; catalogs; data; sampling reports, plans, protocols, reports, analyses; or any handwritten, recorded, transcribed punched, taped, filmed, or graphic matter, however produced or reproduced.
2. The terms **"person"** and/or **"persons"** shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent, or employee thereof.
3. The terms **"relate to"** and/or **"pertain to"** (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.
4. The terms **“you”**, **“your”** and/or **“Warrior”** shall mean Warrior Roofing Manufacturing, Inc., and all its agents, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, and contractors. These terms shall also mean any others who are not listed above and are in possession, custody, or control (actual or constructive) of information relevant to this request or information that is otherwise available to Warrior, or who may have obtained information for or on behalf of Warrior.

All terms not defined in this enclosure have their ordinary meaning, unless such terms are defined in the Clean Air Act and/or its implementing regulations, and in which case the statutory and/or regulatory definitions apply. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions. The terms **“and”** and **“or”** shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.

ENCLOSURE 3

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering part or all of the information, other than emissions data and information or data that is otherwise publicly available, as described in 40 C.F.R. § 2.203(b). If no business confidentiality claim accompanies the information when it is received by the EPA, the EPA may make the information available to the public without further notice. To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any information over which you make a claim of confidentiality should be marked by placing on or attaching to the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret” or “proprietary” or “business confidential” and a date if any when the information should no longer be treated as confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.**

Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. Information covered by such a claim will be disclosed by the EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Act, and 40 C.F.R. Part 2, Subpart B. The EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as “Personal Privacy Information” given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. Part 2, Subpart B.¹ You bear the burden of substantiating your confidentiality claim and must satisfactorily show, among other things, that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so and that the information is not, and has not been, reasonably obtainable by legitimate means without your consent. Conclusory allegations will be given little or no weight.

Before the EPA makes a final determination regarding your claim of confidentiality, pursuant to 40 C.F.R. Part 2, Subpart B, the EPA will send you a letter asking you to substantiate fully your CBI claim by answering several questions. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to meet the requirements so as to be entitled

¹ 40 C.F.R. § 2.208(e) conflicts with the holding in *Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356, 2366 (2019) (*Argus Leader*). In light of the *Argus Leader* decision, the Agency will not consider 40 C.F.R. § 2.208(e) in this determination. The Agency anticipates amending 40 C.F.R. § 2.208 so that it is consistent with the decision in *Argus Leader*.

to confidential treatment. You must provide the EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information.

The EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Please note that if a page, document, group, or class of documents claimed by you to be confidential contains a significant amount of information which the EPA determines is not confidential, your confidentiality claim regarding that page, document, group, or class of documents may be denied. For each item or class of information that you identify as being confidential, the EPA will ask you to answer the following questions, giving as much detail as possible, as conclusory allegations will be given little or no weight in the EPA's determination:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? If so, specify which.
5. Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
6. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, please explain whether the information is the kind that would customarily not be released to the public.
8. Whether you assert the information as voluntary or involuntary, please address why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.

9. If you believe any information to be (a) trade secret(s), please so state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be (a) trade secret(s).
10. Explain any other issue you deem relevant (including, if pertinent, reasons why you believe that the information you claim to be CBI is not emission data or effluent data).

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is *not* entitled to confidential treatment under Section 114(c) of the Act, 42 U.S.C. § 7414(c) or 40 C.F.R. Part 2. “Emission data” means, with reference to any source of emission of any substance into the air - (A) information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing; (B) information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and (C) a general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Information designated confidential will be disclosed by the EPA only to the extent allowed by, and by means of procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

ENCLOSURE 4

Information Request

You are hereby required, in accordance with Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a), to provide the following information. Please note that all production and operating data should be provided in an Excel formatted electronic file. Unless otherwise noted, each question applies to all Warrior facilities in the United States.

1. Provide the following information about Warrior:
 - a. Describe the ownership and business structure;
 - b. Indicate the date and state of incorporation;
 - c. Provide the net worth of the company; and,
 - d. List all facilities owned or operated by Warrior in the United States;

2. Provide any calculations used to estimate annual or short term volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions from petroleum products at any facility, including loading and unloading operations, storage tanks, material transfer (e.g., piping, pumps, etc.), wastewater, stormwater collection systems, or any other equipment used to handle petroleum products at the facility.

3. Provide all information that Warrior has which identifies and/or describes any changes in the formulation of asphalt roofing products.

4. For the Warrior facility located in Tuscaloosa, AL:
 - a. Identify the types of petroleum products that are stored at the facility;
 - b. Provide all air permits and air permit applications and materials for the facility, including communications with the state permitting agency;
 - c. Provide a facility map, drawing, or schematic that identifies each tank and the type of material stored;
 - d. Provide a facility map, drawing, or schematic that identifies the location of any truck loading systems.

5. For the Line 1 Saturator HVAF and Line 2 Saturator HVAF at the Tuscaloosa, AL facility, provide:
 - a. The maximum production rates (ton/hr) and describe any changes to the maximum production rates since 2010;
 - b. A description of the type of product that was being manufactured during the stack test that took place on September 7 and 8, 2010;
 - c. The hourly production rates in tons/hr for the period of September 1, 2022 to September 30, 2022;
 - d. The 3-hour average inlet gas temperature operating range established as specified in § 63.11562(a)(2) and (b)(3); and
 - e. The 3-hour average pressure drop across the device operating range established as specified in § 63.11562(a)(2) and (b)(3).

6. For the Asphalt Roofing Lines 1 & 2 at the Chambersburg, PA facility, provide:
 - a. The maximum production rates (ton/hr) and describe any changes to the maximum production rates since 2010;
 - b. The 3-hour average inlet gas temperature operating range established as specified in § 63.11562(a)(2) and (b)(3);
 - c. The 3-hour average pressure drop across the device operating range established as specified in § 63.11562(a)(2) and (b)(3); and,
 - d. The 3-hour average thermal oxidizer combustion zone temperature at or above the operating value established as specified in § 63.11562(a)(2) and (b)(2).

Performance Testing, Methods, and Reporting Requirements

1. Within 120 days of the date of this Request, Warrior shall conduct stack tests on the emission stack(s) at both the Tuscaloosa, AL and Chambersburg, PA facilities. The stack tests shall be conducted while both saturator lines at both facilities are operating. However, if both saturator lines are not operating, Warrior shall conduct a separate identical stack test on both saturator lines. The lines to be tested include the Tuscaloosa facility's Line 1 Saturator High Velocity Air Filter (HVAF) (Permit No. 413-0023-Z001) and Line 2 Saturator HVAF (Permit No. 413-0023-X002) and the Chambersburg facility's Asphalt Roofing Line 1 (Source 101A) and Asphalt Roofing Line 2 (Source 101B) in accordance with the parameters outlined below, with the HVAFs functioning within normal operating conditions, and provide the following information:
 - a. Warrior shall provide notice at least thirty (30) days prior to commencement of the performance test to EPA, and as applicable, to the Pennsylvania Department of Environmental Protection or the Alabama Department of Environmental Management, containing a performance test plan for EPA review and approval. Test plans must meet the specifications found in 40 CFR § 63.7(c). You must follow all of the procedures as specified in the test methods, including the quality assurance and quality control measures, and document the results in the test report provided to EPA. Any deviations from the methods must be documented in the test plan and approved by EPA before conducting the test program.
 - b. The performance test plan must include the type of product which will be manufactured and the targeted rate of production during the performance test. The targeted rate of production must be present in units of tons/hr and also as a percentage of the maximum rate.
 - c. Testing must be performed at the locations and operational conditions identified in Tables 1 and 2. You must use U.S. EPA Method 1 or 1A of Appendix A of 40 CFR part 60 to select the locations and number of traverse points for sampling. You must conduct test runs for each sample point as directed in Tables 1 and 2. The required units of measure for each pollutant are listed in Table 2.
 - i. You must flag all data that are below the method detection limit (MDL) and provide the MDL. You must use the method specified approach for calculation and determination of the MDL. If the method does not specify the approach and calculation of the MDL, determine the MDL in accordance with the procedures specified in Section 15 of Method 301 (located in Appendix A of 40 CFR part 63). Calculate emission rates for any pollutant below the MDL using the relevant MDL.
2. Within 60 days of the completion of testing at each site, Warrior shall submit a performance test report. At a minimum, all performance test reports must include the following information:
 - a. General identification information for the facility including a mailing address; the actual facility address; the owner or operator, responsible official, or an appropriate representative (where applicable) and an email address for this person; and the appropriate Federal Registry System (FRS) number for the facility;

- b. A brief process description, including a flow diagram;
- c. A complete unit description, including a description of emission streams and control devices, the appropriate source classification code (SCC), the latitude and longitude of the emission point being tested (decimal degrees to five decimal points), and the permitted maximum process rate (where applicable);
- d. Sampling site description; description of sampling and analysis procedures and any modifications to standard procedures; quality assurance procedures;
- e. Operator logs during the performance test;
- f. Production records of asphalt roofing product manufactured during the performance test;
- g. Emission rates of PM and PAH for all emission points in Table 1 calculated using the following equation:

$$E = [(C)*(Q)/(P)*(K)]$$

Where:

E = emission rate of PM or PAH, kg/Mg (lb/ton)

C = concentration of PM or PAH, g/dscm (gr/dscf)

Q = volumetric flow rate of effluent gas, dscm/hr (dscf/hr)

P = the average asphalt roofing production rate or asphalt charging rate over the duration of the test, Mg/hr (ton/hr)

K = conversion factor, 1000 g/kg [7000 (gr/lb)];

- h. Raw data sheets for field and laboratory analyses;
- i. A complete analytical report (if applicable) for Methods 23 and SW-846 Method 8270D, including:
 - i. Sample results;
 - ii. All raw laboratory data such as chromatographs and their ancillary data;
 - iii. All quality control data;
 - iv. All calibration and certification data;
 - v. Chain-of-custody documentation;
 - vi. Explanation of laboratory data qualifiers; and
 - vii. Most recent MDL study for the measured compounds. Include a description of the procedures used to determine the MDL.
- j. Example calculations of all applicable stack gas parameters, emission rates, percent reduction rates, and analytical results, as applicable;
- k. Identification information for the company conducting the performance test including a contact person and his/her email address; and

- l.** Any other information required by the test method, a relevant standard, or the Administrator.

Table 1. Summary of Emission Points

Emission Point	Operational Condition	Number of Runs and Run Length
Line 1 Saturator HVAF (Permit No. 413-0023-Z001)	Manufacturing product that generates the greatest PAH and PM emissions to the HVAF inlet. Operate at above 90% of the maximum production capacity, on average.	Three valid test runs. Minimum sample time of 120 minutes. Minimum sample volume of 3.00 dscm (106 dscf)
Line 2 Saturator HVAF (Permit No. 413-0023-X002)	Manufacturing 6.8-kg (15-lb) felt. Operate at above 90% of the maximum production capacity, on average.	Three valid test runs. Minimum sample time of 120 minutes. Minimum sample volume of 3.00 dscm (106 dscf)
Asphalt Roofing Line 1 (Permit #28-03039)	Manufacturing product that generates the greatest PAH and PM emissions to the regenerative thermal oxidizer inlet. Operate at above 90% of the maximum production capacity (6.50ton/hr), on average.	Three valid test runs. Minimum sample time of 120 minutes. Minimum sample volume of 3.00 dscm (106 dscf)
Asphalt Roofing Line 2 (Permit #28-03039)	Manufacturing product that generates the greatest PAH and PM emissions to the regenerative thermal oxidizer inlet. Operate at above 90% of the maximum production capacity (6.50ton/hr), on average.	Three valid test runs. Minimum sample time of 120 minutes. Minimum sample volume of 3.00 dscm (106 dscf)

Table 2. Summary of Required Emissions Test Methods and Alternative Methods

Pollutant (CAS number)	Required Method	Testing Location(s)	Reported Units of Measure
Requirements for both Chambersburg and Tuscaloosa Facilities			
Particulate Matter (PM)	U.S. EPA Method 5A	Outlet from Line 1 Saturator HVAF and Line 2 Saturator HVAF (Tuscaloosa); Outlet from the regenerative thermal oxidizer (Chambersburg)	lb/hr and ppmvd
Polycyclic Aromatic Hydrocarbons (PAH)	U.S. EPA Method 23 with analysis by SW-846 Method 8270D. When using EPA Method 23, the toluene extraction step in section 3.1.2.1 of the method should be omitted.	Outlet from Line 1 Saturator HVAF and Outlet from Line 2 Saturator HVAF (Tuscaloosa); Outlet from the regenerative thermal oxidizer (Chambersburg)	lb/hr and ppmvd
Asphalt roofing product manufactured	Method used to comply with 40 CFR § 63.11562	A position that provides a properly mixed and representative sample.	tons
O2 and CO2	U.S. EPA Method 3A. Alternatively, U.S. EPA Method 3B.	All pollutant testing locations	Volume % dry
Moisture	U.S. EPA Method 4 or U.S. EPA Method 320. Alternatively, ASTM D-6348 may be used.	All pollutant testing locations	Volume %
Flow Rate	U.S. EPA Method 2C.	Concurrent with Method 18 samplings.	Scfh
Inlet gas temperature	Method used to comply with 40 CFR § 63.11563	Inlet to Line 1 Saturator HVAF and Line 2 Saturator HVAF (Tuscaloosa); Inlet to CECO Air Filers (Chambersburg)	Units used to comply with 40 CFR § 63.11563

Pressure drop across HVAFs	Method used to comply with 40 CFR § 63.11563	Inlet and outlet to Line 1 Saturator HVAF and Line 2 Saturator HVAF (Tuscaloosa); Inlet and outlet to Asphalt Roofing Line 1 and Asphalt Roofing Line 2 CECO Air Filters (Chambersburg)	Units used to comply with 40 CFR § 63.11563
Requirements for Chambersburg Facility only			
Combustion zone temperature	Method used to comply with 40 CFR § 63.11563	Combustion zone of the regenerative thermal oxidizer	Units used to comply with 40 CFR § 63.11563

ENCLOSURE 5

Statement of Certification

I certify that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my personal inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001, 1341, and 1505.

(Signature)

(Printed Name)

(Title)

(Date)