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Subject: Air Emissions Calculation for the Hot Mix Asphalt Industry

Dear Hot Mix Asphalt Plant Owners and Operators:

Since 1996, the DNR's Bureau of Air Management and the Wisconsin Asphalt Pavement Association (WAPA) have worked jointly to develop guidance in determining air emissions from hot mix asphalt (HMA) plants operating in Wisconsin. The discussions developed as a result of a concern that the air emissions from HMA were not consistently calculated throughout the state per reporting requirements contained in s. NR 438.03(1), Wis. Adm. Code. From these discussions, preliminary guidance documents were developed in 1997 and 1999.

Air management used the preliminary documents to calculate annual air emissions for HMA plants during this time period with the understanding that a final document would be issued to HMA owners and operators once this document was finalized. A work group of Air Management and WAPA members started finalizing the preliminary HMA emission inventory document in 1999. You are receiving a copy of this finalized document as an enclosure to this letter.

The document, **Hot Mix Asphalt Plant, Air Emission Inventory Guidance**, contains emission calculation information applicable to batch mix, parallel flow drum mix, and counterflow drum mix HMA plants. This document will be used, as much as possible, for calculating 2001 air emissions from asphalt plants.

One of the areas of discussion between Air Management and WAPA was the issue of calculating sulfur dioxide emissions from fuel oil burned while generating hot mix asphalt. DNR has agreed that the HMA plants will be given a 50% removal credit for these emissions because of testing information that appears to show that 50% of the sulfur dioxide emissions are absorbed by the hot mix asphalt when the product is produced. WAPA and Air Management agreed that fuel oils contain different sulfur contents and so it was difficult to determine the sulfur dioxide emissions without accounting for the sulfur in the fuel oil. For that reason, Appendix A contains 13 sheets in which the HMA owner or operator can record the amount of fuel burned and the sulfur content of that fuel for each month. At the end of the year an over-all weighted average sulfur content can then be calculated and then used for the annual emission inventory reporting. This information is also available in an Excel spreadsheet which you can load onto your computer and the Excel spreadsheet will calculate the weighted percent sulfur for all fuel oils burned over the calendar year. If you are interested in this spreadsheet, you can download it from the following webpage: <http://www.dnr.state.wi.us/org/aw/air/emission/calculations.htm>
Please begin recording the fuel oil used starting January 1, 2002 using either the sheets in the back of this document or the Excel spreadsheet.

WAPA and Air Management expect that this will be one in a series of documents as better testing data is acquired on asphalt plant emissions. You will be notified when updates are available.

If you have any questions regarding this document please feel free to call Gerald Waelti of WAPA or Ralph Patterson of DNR's Bureau of Air Management at 608-267-7546.

Sincerely,

Gerald Waelti
Wisconsin Asphalt Pavement Association
Executive Vice President

Patrick Kirsop
Small Business Section Chief
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