Statement of Limitations in Emerald Eco-Label Software
Effective April 1, 2022

Certain aspects of Version 2 of the Product Category Rules (PCR) for Asphalt Mixtures have not been implemented in the Emerald Eco-Label software due to the time constraints associated with software development. NAPA intends to implement these features in future updates of the Emerald Eco-Label software. Below is a summary of features that are not currently supported. **Let us know if you are interested in any of these features by sending an email to epd@asphaltpavement.org** so we can prioritize future software updates. Be sure to indicate which features are of interest, and the number of asphalt plants that would likely utilize each feature. This is not an exhaustive list of limitations, but it should cover the vast majority of features that may be of interest to asphalt mix producers, agencies, and other stakeholders.

- **Portable asphalt plants.** The new PCR has specific requirements for EPDs for portable asphalt plants. The applicable data collection requirements have not been incorporated into the Emerald Eco-Label software. This functionality is NAPA's top priority for future software updates.

- **Support for asphalt plants that produce cold central plant recycling (CCPR) mixtures is limited.**

    o **Hybrid asphalt plants that produce hot-mix and warm-mix asphalt (HMA and WMA) and also produce asphalt mixtures at ambient temperatures using cold central plant recycling (CCPR) technology are not supported in most cases.** While the vast majority of asphalt plants are dedicated to either HMA/WMA production or CCPR production, NAPA is aware of a small number of plants that do both. The new PCR has specific requirements for these dual-purpose hybrid plants to ensure that energy inputs during mix production are appropriately allocated. This functionality will be incorporated into a future update of the Emerald Eco-Label software.

    o In the meantime, hybrid plants that produce both HMA/WMA and CCPR mixtures can still develop EPDs for their HMA/WMA mixtures only if they use a 12-month data collection period during which the plant exclusively produced HMA/WMA mixtures. These plants should not develop EPDs for CCPR mixtures, since they will significantly overstate the impacts associated with CCPR mix production.

    o **Plants that exclusively produce CCPR mixtures** (sometimes referred to as pugmill plants) can develop EPDs only for asphalt mixtures that use asphalt binder foaming technologies, but not for mixtures that use emulsified asphalt. At this time, emulsified asphalt is an upstream data gap that precludes the development of EPDs for these mixtures. When appropriate data become available, NAPA intends to add this functionality to the Emerald Eco-Label software.

- **Renewable energy purchases.** Market-based instruments that are used to purchase renewable energy, including on-site renewable energy generation, power purchase agreements (PPAs), renewable energy certificates (RECs), and similar market-based instruments cannot be used to reduce or offset the asphalt plant's electricity consumption. The new PCR allows plants to report GHG emission reductions associated with renewable energy purchases as additional environmental information if certain data quality and documentation requirements are met. NAPA intends to incorporate this functionality into a future update of the Emerald Eco-Label software.

- **EPDs cannot be developed for asphalt mixtures that use slag aggregates.** At this time, slag aggregate manufacturing is an upstream data gap that precludes the development of EPDs for mixtures that include slag aggregates. When appropriate data become available, NAPA intends to add this functionality to the Emerald Eco-Label software.

- **EPDs cannot be developed for asphalt plants located in Canada.** The new PCR has an expanded geographic scope that includes Canada. However, the Emerald Eco-Label software does not currently support this functionality. NAPA may add support for asphalt plants located in Canada if warranted by market demand.

- **Additional environmental information.** The new PCR allows EPDs to include information related to various environmental programs that companies and asphalt plants may participate in. The Emerald Eco-Label software does not currently support this functionality, but NAPA intends to include it in a future software update.

   o **NAPA Awards and Commendations** including the Diamond Achievement Commendation, Diamond Achievement Sustainable Commendation, and the Environmental Leadership Award.

   o **ENERGY STAR Program** including the ENERGY STAR Plant Certification Program, the Energy Performance Score, the Challenge for Industry, and the Partner of the Year Award.

   o **Environmental Management System (EMS)** for companies that have established an EMS.

- **The Optimizer is not yet functional.** The Optimizer is currently being updated to incorporate the appropriate changes to the Emerald Eco-Label software. We will inform Emerald Eco-Label users when this functionality has been restored.