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AIR CP_1004788959_CP_20160816_Investigation_1356065
Texas Commission on Environmental Quality
Investigation Report

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Customer: Building Materials Corporation of America
Customer Number: CN600474753

Regulated Entity Name: GAF MATERIALS

Regulated Entity Number: RN100788959

Investigation # 1356065

Investigator: BRIAN CUNNINGHAM

Conducted: 08/16/2016 -- 08/16/2016

Program(s): AIR OPERATING PERMITS
AIR NEW SOURCE PERMITS

Investigation Type: Compliance Invest File Review

Additional ID(s): 7711A
DB0378S
2771

Incident Numbers

Site Classification MAJOR SOURCE

SIC Code: 2952

NAIC Code: 324122

Location: 2600 Singleton Blvd

Address: 2600 SINGLETON BLVD,
DALLAS, TX , 75212

Local Unit: CITY OF DALLAS LOCAL PROGRAM

Activity Type(s): OPCC - AIR OPCC - OFFICE PERMIT
COMPLIANCE CERTIFICATION

Principal(s):

Role

Name

RESPONDENT

BUILDING MATERIALS CORPORATION OF AMERICA

Contact(s):

Role

Title

Name

Phone

REGULATED
ENTITY MAIL
CONTACT

PLANT MANAGER

MR DURWIN
FARLOUGH

Phone (214) 637-8977

Other Staff Member(s):

Role

Name

QA Reviewer
Supervisor

JONI KEACH
JONI KEACH

RECEIVED

FEB 14 2020

Associated Check List

Checklist Name

AIR ANNUAL COMPLIANCE CERTIFICATION
REVIEW - OPCC

Unit Name

Facility

TCEQ
CENTRAL FILE ROOM

Investigation Comments:

INTRODUCTION

This investigation was conducted as an office permit compliance certification (OPCC) investigation for Building Materials Corporation of America (GAF Materials) located at 2600 Singleton Blvd, Dallas, Texas 75212 by Brian Cunningham Investigator for the Dallas Local Air Program. The purpose of this investigation was to confirm

compliance with annual compliance certification requirements for the facility with Texas Commission on Environmental Quality (TCEQ) rules and regulations under 30 Texas Administrative Code (TAC) Chapter 122.146, Compliance Certification Terms and Conditions.

GAF is a major source of Particulate Material (PM) and Sulphur Oxides (SOx) as defined by 30 Texas Administrative Code (TAC) Chapter 122.10(13), and therefore, it is subject to the Federal Operating Permits Program. GAF is authorized to operate under Federal Operating Permit (FOP) No. O-2771, issued on 03/9/06 and amended on 11/25/14 and NSR Air Permit No. 7711A, initially issued on 07/07/86 and recently renewed on 11/25/14. This facility is required to operate in accordance with the requirements of 30 TAC Chapter 122.143 through 30 TAC 122.146, which includes recordkeeping conditions, reporting conditions (including deviation reporting), and compliance certification conditions. The plant manager, Durwin Furlough, will serve as the mail contact.

Daily Narrative

The last Title V based compliance investigation on this facility was a site permit compliance investigation (SPCI) conducted on 08/05/15 by the Dallas local program, in which no deficiencies or violations were noted (CCEDS No. 1272667).

This investigation will cover the compliance period of 03/09/15 through 12/31/15. An in house review of annual compliance documents submitted by GAF was conducted on 08/16/16 by Brian Cunningham, investigator for the Dallas Local Program.

In previous years GAF had submitted Title V Annual Compliance Certification Reports that covered the reporting period of March 9th to March 8th of the next year. GAF also submitted semi-annual deviation reports during every certification period. In an effort to streamline with other Federal reports GAF is required to submit, the facility requested to change their annual Title V Certification Period to January 1 to December 31 of each year, beginning 01/01/16.

The previous annual certification period for GAF was 03/09/14 to 03/08/15. To ensure compliance with Title V Permit reporting requirements, GAF submitted a shortened Annual Certification Report covering 03/09/15 to 12/31/15 and a semi-annual deviation report that covered 03/09/15 to 09/09/15 and a second semi-annual deviation report was submitted that covered 09/10/15 to 12/31/15. No deviations were noted by GAF during the certification period evaluated during this investigation.

The Form OP-CRO1, was signed and dated by the designated responsible official and was received on 01/25/16. The Permit Compliance Certification and deviation reports were submitted within 30 days after the end of each certification period, as required by 30 TAC 122.146(2).

These reports cover all dates in 2015 after the end of the previous Annual Certification Period (03/08/15) and allow GAF to transition to the new certification dates. No violations were noted during this investigation.

Exit Interview: NA. An exit interview was not necessary for this investigation.

GENERAL FACILITY AND PROCESS INFORMATION

GAF Materials manufactures roofing shingles. GAF has been at its present location for over 20 years, but a roofing facility has been at this site since the 1940's. The facility has approximately 200 employees. The plant operates three shifts per day, 24 hours per day 7 days per week.

Line No. 1 makes conventional shingles. Line No. 3 makes laminate shingles. Large rolls/webs of fiberglass are fed into both shingle lines. Both surfaces of the fiberglass are coated with an asphalt and limestone mixture. The mixture is piped in from outdoor heated storage silos. After coating, a controlled layer of granules is dropped and embedded into the upper surface of the mat. The mat is flipped and a thin layer of sand is applied to the lower surface. The granules are received from hopper cars and bottom-loaded to silos via a bucket elevator. The granules are conveyed into the processing equipment. Fifteen silos contain granules and one is reserved for sand for Line #3. The silos are not equipped with dust collectors but the granules don't pose a particulate issue. Two outdoor bins hold non-colored, head lap (unexposed area of shingle) granules. Two roof-mounted, pulse air bag houses are located here; one unit for the 120 ton filler silo and the other for the filler use bin. Filler is a cheaper form of the limestone material. The filler is first off-loaded from a truck into a 120 ton, Hollow-Flayed filler silo. The material is transferred to a heater where it is heated to 300-400°F. The material is then transferred to a holding bin. The limestone and asphalt are mixed and moved by a paddle mixer and screw conveyor to the coating unit. Line No. 3 is similar in operation to Line No. 1, except for a few differences in equipment including

that the granules are stored in nineteen silos and the sand in one. Two 80 ton silos contain the filler material which is entered straight into the process.

The laminated shingles involve the following: The lamination occurs after the cooling is done with self-seal asphalt based dots, heat and pressure. A second layer is added to approximately half of the shingle to create a textured appearance. After coating, the web is water cooled and cut into sheets or shingles, stacked and packaged. Where the roll of dry un-woven fiberglass mat first feeds into the system, a negative air and dry filter system captures any loose fibers. Three dust collectors with approximately 144 bags each capture indoor plant emissions. The asphalt is received in bulk by truck or train. The material is initially received stored in two upright tanks, transferred into a holding tank, then conveyed into smaller tanks. All tanks or stills are jacketed and heated with steam coils to keep the asphalt hot. If cooling is necessary, blow still No. 13 is cooled internally, and blow still No. 26 is cooled externally with water. A total of nine tanks are used for storage. Other tanks are on-site but not in use, although functional. The facility has 2 boilers. Boiler No. 1 has a rating of 15mmBtu and Boiler No. 2 has a rating of 10 MMBtu. An electrostatic precipitator is the VOC and PM control device for Lines No. 1 and No. 3. A knockout tank takes emissions from the asphalt blowing stills and routes them to a thermal oxidizer, which is set at 1450° F and has a continuous monitoring system

BACKGROUND

Compliance History and Performance Classification:

GAF Materials RN100788959: High - 0

Building Materials Corporation of America CN602717464: High - 0

Current Enforcement Issues: None

Agreed Orders, Court Orders, and other Compliance Agreements: None in the past five years

Complaints: None

Prior Enforcement Issues: None in the past five years

ADDITIONAL INFORMATION:

Conclusions, Current Enforcement Issues, and Recommendations:

No violations were noted during this investigation. The facility will receive a General Compliance Letter.

Additional Issues: None

No Violations Associated to this Investigation

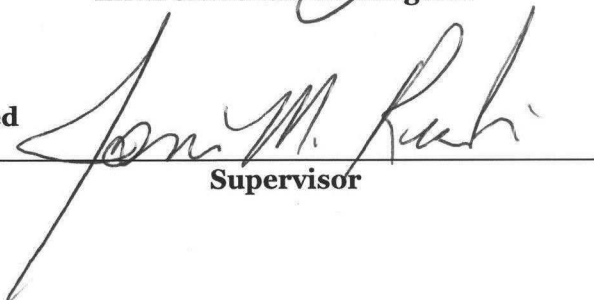
Signed


Environmental Investigator

Date

8/17/16

Signed


Supervisor

Date

8/17/16

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

A Letter to Facility (specify type) : GCL

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

___ Other (specify) :



August 18, 2016

Mr. Durwin Farlough
GAF Materials Corporation
2600 Singleton Boulevard
Dallas, TX 75212

RE: Title V Office Permit Compliance Investigation (OPCC) at GAF Materials Corporation, 2600 Singleton Boulevard (Dallas County), Texas, TCEQ Account Numbers: RN 100788959, CN 602717464, DB0378S

Dear Mr. Farlough:

On August 16, 2016, Mr. Brian Cunningham with the City of Dallas Air Quality Compliance Program conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for air pollution. No violations were documented during the investigation.

The City of Dallas Air Quality Compliance Program and Texas Commission on Environmental Quality (TCEQ) appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Cunningham at 214/948-4203.

Sincerely,

A handwritten signature in black ink that reads 'Joni M. Keach'.

Joni M. Keach, R.S., Manager
Air Quality Compliance Program
Public Works Department