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Texas Commission on Environmental Quality
Investigation Report

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Customer: Building Materials Investment Corporation
Customer Number: CN605251487

Regulated Entity Name: GAF MATERIALS

Regulated Entity Number: RN100788959

Investigation # 1505087

Investigator: MARILYN FITZNER

Conducted: 07/23/2018 -- 07/23/2018

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

Investigation Type: Compliance Investigation

Additional ID(s): 7711A
DB0378S
2771

Incident Numbers

Site Classification MAJOR SOURCE
MAJOR SOURCE

SIC Code: 2952
SIC Code: 2951
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 INVESTMENT CORPORATION

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY MAIL CONTACT	SENIOR ENVIRONMENTAL ENGINEER	MR KEVIN BUSH	Phone (214) 872-2325

Other Staff Member(s):

Role	Name
QA Reviewer	BRIAN CUNNINGHAM
Supervisor	BRIAN CUNNINGHAM

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR ANNUAL COMPLIANCE CERTIFICATION REVIEW - OPCC	O-2771

Investigation Comments:

INTRODUCTION

This in-house investigation was conducted as an office permit compliance certification (OPCC) investigation for

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Building Materials Investment Corporation (GAF Materials) located at 2600 Singleton Blvd, Dallas, Texas 75212 by Marilyn Fitzner, Investigator for the Dallas Local Air Program. (LAP).

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 03/9/2006, reissued on February 10, 2016 and last requested for a revision on 01/24/2018. The FOP will expire on 02/10/2021. GAF also operates under NSR Air Permit No. 7711A, Standard Permit No. 91414 and several Permits by Rule (PBRs). The current NSR permit will expire on 11/25/2024. The 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. Kevin Bush, Sr. Environmental Engineer will serve as the mail contact.

The purpose of this investigation was to confirm compliance with annual compliance certification requirements and deviations reported during the period 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. Compliance was evaluated by a review of records in the Dallas Local Air Program Files.

The current Title V certification period for GAF that was evaluated was 01/01/2017, through 12/31/2017. The last Title V investigation was a Site Full Compliance Investigation (SFCI), performed by the Dallas LAP, CCEDS Investigation No. 1428434 which was conducted on 07/17/2017, for the compliance period 01/01/2016 through 12/31/2016. No violations were noted during the investigation.

Daily Narrative

On 07/23/2018, the investigator conducted an in-house file review of GAF. A Permit Compliance Certification (PCC) and Deviation Report for the 07/01/2017 through 12/31/2017 was received by the Dallas LAP on 01/23/2018. This is within 30 days after the end of the certification period as required by 30 TAC 122.146(2) and 30 TAC 122.145(2)(C). A signed Certification by Responsible Official Form (Form OP-CRO1) was also included. During this period, GAF reported that no deviations had occurred.

A PCC and Deviation Report for the 01/01/2017, through 06/30/2017, compliance period, was received by the Dallas LAP on 07/20/2017. This is within 30 days after the end of the certification period as required by 30 TAC 122.146(2) and 30 TAC 122.145(2)(C). A Form OP-CRO1 was included. During this period, GAF reported that no deviations had occurred.

GAF also used these reports to address the National Emission Standards for their Hazardous Air Pollutants (NESHAPS) Compliance report required by 40 CFR 63 Subpart AAAAA. GAF utilized the TCEQ PCC form for the compliance reports, which specifies that the entity is certifying compliance with all terms and conditions in the permit, in accordance with 30 TAC §122.146(5). A review of the Dallas LAP Files and CCEDS incident records did not reveal any additional deviations.

Exit Interview

On 07/23/2018, Mr. Bush was informed of the results of the investigation by telephone.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

GAF operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 605251487. The Dallas Plant has been assigned TCEQ Air Quality Account Number DB-0378-S and Regulated Entity Number (RN)100788959.

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

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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

Building Materials Investment Corporation doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). GAF operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 605251487. The Dallas Plant has been assigned TCEQ Air Quality Account Number DB-0378-S and Regulated Entity Number (RN)100788959. Compliance History and Performance Classification: (from the TCEQ Central Registry Internal Reporting Query) RE Name: GAF MATERIALS RN: RN100788959

Classification: HIGH Rating: 0 Publication Date: Nov 15, 2017

Customer Name: BUILDING MATERIALS INVESTMENT CORPORATION CN: CN605251487

Classification: HIGH Rating: 0 Publication Date: Nov 15, 2017

Agreed Orders, Court Orders, and other Compliance Agreements:

No violations were noted during this investigation.

Prior Enforcement Issues:

No violations were noted during this investigation.

Complaints:

None in the past two years.

ADDITIONAL INFORMATION:

Conclusions, Recommendations, and Current Enforcement Actions.

No violations were noted during this investigation, and the facility will receive a General Compliance Letter.

Additional Issues: None

No Violations Associated to this Investigation

Signed


Environmental Investigator

Date

7-23-18

Signed


Supervisor

Date

7/24/18

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ 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) :



July 24, 2018

Kevin Bush
GAF Materials
2600 Singleton Blvd,
Dallas, TX 75212

**RE: Title V Office Permit Compliance Investigation (OPCC) at: GAF Materials,
2600 Singleton Blvd., (Dallas County), Texas, TCEQ Account Numbers:
RN 100788959 CN 605251487 DB 0378S**

Dear Mr. Bush:

On July 23, 2017, Ms. Marilyn Fitzner with the City of Dallas Air Quality Compliance Program conducted investigations 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 Ms. Fitzner at 214-671-5235.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Cunningham'.

Brian Cunningham, R.S., Manager
Air Quality Compliance Program
Office of Environmental Quality