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AIR CP\_100788959\_CP\_20190729\_Investigation\_1581522\_  
**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 #** 1581522

**Investigator:** TAYLOR KUBIC

**Conducted:** 07/29/2019 -- 07/29/2019

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

**Investigation Type:** Compliance Investigation

**Additional ID(s):** 7711A  
DB0378S  
147140  
DB0378S  
2771  
91414

**Incident Numbers**

**Site Classification** MAJOR SOURCE

**SIC Code:** 2952

**SIC Code:** 2951

**NAIC Code:** 324122

**Location:** 2600 Singleton Blvd

**Address:** ,  
, ,

**Local Unit:** CITY OF DALLAS LOCAL PROGRAM

**Activity Type(s):** SFCI - SFCI (SITE FULL  
COMPLIANCE INVESTIGATION)  
SPCI - AIR SPCI - TITLE V SITE  
PARTIAL COMPLIANCE INV-EPA  
PCE

**Principal(s):**

<b>Role</b>	<b>Name</b>
RESPONDENT	BUILDING MATERIALS INVESTMENT CORPORATION

**Contact(s):**

<b>Role</b>	<b>Title</b>	<b>Name</b>	<b>Phone</b>
REGULATED ENTITY MAIL CONTACT	ENVIRONMENTAL ENGINEER	MR KEVIN BUSH	Phone (469) 337-4475
PARTICIPATED IN	MANAGING ENVIRONMENTAL CONSULTANT	MS LATHA KAMBHAM	Work (972) 661-8100 Fax (972) 385-9203
NOTIFIED	TITLE V PROGRAM LEAD INVESTIGATOR	MR LUKE JONES	Work (817) 588-5832

**Other Staff Member(s):**

<b>Role</b>	<b>Name</b>
QA Reviewer	MARILYN FITZNER
Supervisor	MARILYN FITZNER

**Associated Check List**

<b><u>Checklist Name</u></b>	<b><u>Unit Name</u></b>
AIR GENERIC INVESTIGATION (10 ITEMS)	2771
AIR ANNUAL COMPLIANCE CERTIFICATION REVIEW - SPCI	2771

**Investigation Comments:****INTRODUCTION**

On 07/29/2019, a Site Permit Compliance Investigation (SPCI)/ Site Full Compliance Investigation (SFCI) was performed at Building Materials Corporation of America (GAF Materials) located at 2600 Singleton Blvd, Dallas, Texas 75212 by Taylor Kubic, an investigator for the City of Dallas Air Quality Compliance Program. The purpose of this investigation was to evaluate compliance with requirements of the site's federal air quality authorization, which is detailed in Title 30 of the Texas Administrative Code (TAC) Chapter 122- Federal Operating Permits Program, as well as all other state and federal air quality regulations. Mr. Kevin Bush, Senior Environmental Engineer for GAF, and Ms. Kalpalatha Kambham (Ms. Latha Kambham), Environmental Consultant with Trinity Consultants, were the contacts for this investigation. Mr. Bush was contacted by email on 07/22/2019 to schedule this investigation and was informed of the purpose of the investigation at that time. Mr. Bush will also act as the mail contact for this investigation. Mr. Luke Jones of the TCEQ Region 4 office was consulted for assistance in the completion of this Title V report.

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 renewed on 10/28/2016, but it has since been amended as will be discussed later in the report. GAF also operates under NSR Air Permit No. 7711A, initially issued on 07/7/1986, and its most recent renewal makes this permit effective until November 25, 2024. NSR Permit #7711A incorporates several other NSR authorizations and Permits by Rule (PBRs) that further authorize this facility's operations. GAF's FOP incorporates all these various permits into a single document. The FOP does this through means of referencing the various permits and through its various attachments. Essentially, the facility must comply with every condition and term listed in the permit, its attachments, and all terms/conditions listed in referenced permits. In regulatory terms, 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.

**Daily Narrative**

The last Title V based compliance investigation on this facility was an office permit compliance certification (OPCC) Investigation (No. 1505087) conducted by the City of Dallas Air Quality Compliance Program on 07/23/2018. During that investigation, it was determined that GAF complied with all certification requirements.

An in-house review of annual compliance documents submitted by GAF was conducted. This investigation will cover the compliance period of 01/01/18 through 12/31/18. GAF submitted a change of ownership from "Building Materials Corporation of America" to "Building Materials Investment Corporation" effective 10/10/16. For this report, GAF mailed in the following certification documents:

1. Title V Annual Compliance Certification (certification period: 01/01/2018 thru 12/31/2018)
2. Title V Semi-Annual Deviation Report (Covering 07/01/2018 thru 12/31/2018)
3. MACT Subpart AAAAAAA Semi-Annual Compliance Certification (Reporting Period: 07/01/2018 thru 12/31/2018)
4. Title V Permit Semi-Annual Deviation Report (covering 01/01/2018 – 06/30/2018)
5. MACT Subpart AAAAAAA Semi-Annual Compliance Certification (covering: 01/01/2018 – 06/30/2018)
6. Title V Permit Certification (covering: 01/01/2018 – 06/30/2018)

The Title V Program requires the respective facility to certify, at the minimum, on an annual basis that the facility is fully compliant with all terms and conditions of its Title V FOP (as required by 30 TAC 122.146(1)) or to identify

the areas where the facility was noncompliant with those terms and conditions (deviations). If a deviation was identified, then it must be reported in the 6-month reporting period in which it occurs. If no deviations were identified within any six-month reporting period, the facility is not required to submit a deviation report. The certification documents must include deviation reports, if needed, and a Form OP-CRO1, which must be signed by a Responsible Official who certifies with a statement of accuracy (as required by 30 TAC 122.165(b)) that the facility has conducted a thorough self-audit to identify any noncompliance issues with the terms and conditions of its FOP. These certification documents must be submitted by the 30th day after the end of the certification/reporting period, as required by 30 TAC 122.146(2). GAF Dallas sent in two Title V Permit semi-annual deviation reports; one for each six months of the 2018 calendar year, which is the certification period on which this report is focused. Each semi-annual deviation report was accompanied by a Form OP-CRO1, which was signed by a Responsible Official, and it included the required statement of accuracy that a thorough self-audit of the facility to identify deviations had been performed within the listed dates. Ms. Latha Kambham, GAF's environmental consultant, emailed the investigator proof of the postmark dates for these documents on 08/05/2019. All documents were postmarked within 30 days of the end of the respective reporting period. Also, Special Condition 5 of GAF's FOP requires this facility comply with certain federal regulations, which also require compliance certification every six months. Specifically, this additional federal regulations' certification includes a Semi-Annual Compliance Certification with the National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing codified in 40 CFR Part 63, Subpart AAAAAAA (MACT Subpart AAAAAAA). In both sets of semi-annual compliance certifications, GAF reported two deviations. The 2 deviations reported in the Title V Permit Semi-Annual Deviation Reports concern the two deviations reported in the MACT Subpart AAAAAAA semi-annual deviation reports, and they will be discussed in the paragraph to follow.

The two deviations reported in the Title V Permit Semi-Annual Deviation reports are actually a singular noncompliance issue spread over two reporting periods. The noncompliance began 05/12/2018 and it was noticed and resolved by 07/27/2018. The deviations represent a noncompliance with Special Condition 7 of the FOP, which states this facility must also comply with the terms and conditions of all New Source Review authorizations issued for this facility, specifically NSR Permit #7711A. Within NSR Permit #7711A, the facility was noncompliant with Special Condition 5B, which states that this facility must comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants (NESHAPS) for source categories in 40 CFR Part 63, Subpart AAAAAAA – Area Sources: Asphalt Processing and Asphalt Roof Manufacturing. The specific citation for which this facility failed to comply is: 40 CFR 63.11564(c). This citation states that the facility must maintain complete and thorough records of the monitoring data that has been collected for compliance purposes. In this specific case, GAF personnel failed to record monitoring data that was being measured to ensure that emission controls were functioning properly. In the coating section of GAF's production process, a fiberglass sheet is stretched out horizontally and is coated with a layer of hot, raw asphalt on both sides. This part of the process produces VOC emissions, which are controlled by the Coalescing Filter Mist Elimination System (CFL). GAF has two of these asphalt coating lines (Line 1 & Line 3), and a corresponding CFL on each line as well. To ensure each CFL is functioning properly, a temperature sensor measures the temperature of the process before entrance into the CFL. The second data point measured is the differential pressure across the filter in the CFL. This monitoring data is automatically recorded by a device called the Programmable Logic Control (PLC) into an electronic database. The data sensors, the PLC, and the electronic database all form the Continuous Parameter Monitoring System (CPMS). GAF personnel removed Line 1 from operation early in 2019. Since this line was out of service, personnel disconnected the wiring to the PLC because blank data would have been recorded. The issue arose because the PLC did not have separate wiring for Line 3, which remained operable. As a result, the PLC was unable to record monitoring data from Line 3 even though the data sensors were still performing measurements. The PLC was disabled on 05/12/2018. On 08/05/2019, the City of Dallas investigator, Mr. Taylor Kubic, conducted a phone conversation with GAF's consultant, Ms. Latha Kambham, to gather more information. Mr. Kubic found that the data could not be recovered and that the system did not alarm personnel because it was only programmed to do so when measurements were poor; there were no measurements recorded in this case. As a result, personnel did not discover this issue until 07/27/2018. On this date, separate wiring was connected between the PLC and Line 3, and the PLC was also recalibrated. Line 1 & Line 3 are no longer powered by a single set of wiring.

On 08/05/2019, the City of Dallas investigator spoke with Mr. Luke Jones, an environmental investigator for the TCEQ Region 4 Office, via phone, about this respective deviation. Mr. Jones stated that this failure to maintain records and subsequent resolution to the noncompliance represents a Noted and Resolve Notice of Violation (NOV). The NOV is best cited for 30 TAC 116.115(C): Failure to comply with all of the special conditions of Federal Operating Permit O-2771. On 08/13/2019, Mr. Kubic notified Ms. Kambham and Mr. Kevin Bush, GAF's environmental engineer & the regulated entity mail contact, that their facility would be issued a Noted and Resolved NOV for this noncompliance. Mr. Kubic emailed GAF's representatives an Exit Interview Form



(Attachment 1) to officially document the NOV. He also informed them that no further action was needed because they had already resolved the noncompliance. The facility accurately identified and reported this noncompliance as a deviation in each MACT Subpart AAAAAAA Semi-Annual Compliance Certification.

The onsite investigation began at 1000. Area surveillance was conducted, and the following weather conditions were observed: Temp was 87° F, Humidity 57%, Wind SW @12 mph, and Clear Skies. No visible emissions or off property odors were noted. The facility was not in operation during the investigation.

The Special Terms and Conditions of FOP O2771 were discussed and the requirement of emissions observations was evaluated. Records of quarterly opacity observations were available for review. The Self-Certification documents including the deviation reports and MACT Subpart AAAAAAA self-certifications were briefly discussed.

The Special Conditions of NSR Air Permit No. 7711A were discussed and evaluated with a records review and walkthrough of the facility. The following Special Conditions were evaluated during the walkthrough, and each special condition's compliance status is detailed as follows:

**Emission Limitations**

1. This permit covers only the sources of emissions listed in the attached table entitled "Emission Sources – Maximum Allowable Emissions Rates" (MAERT) plus planned startup and shutdown activities.

**Fuel Specifications**

2. In Compliance (IC). Mr. Bush stated that the only fuel in use at the facility is sweet natural gas.

3. NA – Representatives from the TCEQ or Dallas Local Program have not requested a sample or analysis of the fuel used at GAF.

**Federal Applicability**

4. IC – The facility is required (and verified during the investigation) to comply with all applicable requirements of U.S. EPA regulations on Standards of Performance for New Stationary Sources in Title 40 CFR Part 60 specifically:

**A. Subpart A -General Provisions;**

(1) Chapter 60.7(b) GAF is required to maintain records of any MSS activities of the air pollution control equipment. Records of MSS activities were made available.

(2) Chapter 60.7(f) Maintain records of the continuous monitoring system including all testing, adjustment and maintenance, and calibration checks of the system.

**B. Subpart Dc – Small Industrial/Commercial/Institutional Steam Generating Units;**

(1) Chapter 60.48c- GAF is required to record and maintain daily natural gas (fuel) usage for the Waste Heat Boiler and the Standby Boiler. These records were available during the investigation.

**C. Subpart UU - Asphalt Processing and Asphalt Roofing Manufacture.**

(1) Chapter 60.473(d) Record the operating temperature of the thermal oxidizer during stack testing and maintain records of temperature monitoring for at least 5 years. Stack testing was last performed at the facility in August 2011. Records of temperature monitoring were available during the investigation.

(2) Chapter 60.473 Record visible emissions and maintain records for the following emission points. These records were made available during the investigation:

(a) The blowing stills from PROLine 3

(b) The asphalt storage tanks in PROLine 3

(c) The saturator on PROLine 3

(d) The mineral handling and storage facilities in PROLine 3

5. Non-Compliant (NC) - The facility is required to follow NESHAP regulations for Area Sources under 40 CFR part 63 specifically:

**A. Subpart A – General Provisions; and**

**B. Subpart AAAAAAA – Area Sources: Asphalt Processing and Asphalt Roofing manufacture;** GAF is required to develop and maintain records of a site-specific monitoring plan. GAF developed a site monitoring plan on January 2013. The plan used stack testing performed in 2011 to establish an optimal combustion zone temperature for the thermal oxidizer. GAF is also required to maintain records of emission tests, written records of manufacturers' specifications for control equipment, records of the operating temperature of the thermal oxidizer, and records of monitoring data for the CFL that controls emissions in the coating area, where raw hot asphalt is applied to both sides of the fiberglass mat. If needed, records of the voltage operating range for the

electrostatic precipitator (ESP) must be maintained as well.

GAF was non-compliant with this special condition because it did not comply with all conditions of the referenced federal regulation of this special condition. Specifically, personnel disconnected the data recording device in the coating section of both production lines. As a result, no monitoring data was collected on the emission control device of this part of the production process. Therefore, it cannot be determined if this emission control device was functioning properly during the period of May 12, 2018 through July 27, 2018. Ms. Kambham stated, in the aforementioned phone conversation, that no visible emissions were observed from this area during that time period. As a result, they believe the VOC emissions were being captured by the control device. However, this issue represents a noncompliance with the aforementioned site monitoring plan. The specific citation in which GAF failed to comply with the referenced federal regulation of this special condition is: 40 CFR 63.11564(c). This citation states that the facility must maintain complete and thorough records of the monitoring data that has been measured for compliance purposes. In summary, this failure to maintain records and the subsequent resolution to the noncompliance on July 27, 2018 equates to a Noted and Resolved Notice of Violation (NOV). The NOV is best cited for 30 TAC 116.115(C): Failure to comply with all of the special conditions of Federal Operating Permit O-2771. On 08/13/2019, the City of Dallas emailed Mr. Kevin Bush of GAF and Ms. Latha Kambham of Trinity Consultants an Exit Interview Form, which officially documents this NOV. No further corrective action is needed by GAF.

#### Opacity/Visible Emission Limitations

6. IC – Opacity of PM emissions from the coalescing filter mist systems, dust collector stacks, bag house stacks, process heater vents, and building vents at the facility with a 5% opacity limit averaged over a six minute period has not been observed. No opacity was observed during this investigation.

7. IC - Opacity of emissions from all asphalt storage tanks at the facility is limited to 0% over a six-minute period. Opacity of PM emissions from any blowing still is limited to 0% over a six-minute period. The investigator reviewed opacity observation records from the facility and no visible emissions have been documented. No opacity was observed during this investigation.

8. IC – Opacity of emissions from any storage silo and mineral handling facility is limited to 1% over a six-minute period. No opacity emissions were observed from any storage silos or mineral handling areas.

9. IC - No visible fugitive emissions from asphalt manufacturing operations and facilities, roads, or travel areas are allowed to leave GAF property. No reports from third parties have claimed that visible emissions have been leaving GAF's property. No visible emissions were observed leaving the property during this investigation.

#### Operational Limitations, Work Practices, and Plant Design

10. IC – Emissions from Stillyard Asphalt Storage Tanks, Blowing Stills, from truck and railcar loading and unloading, and self-seal asphalt storage tank are vented to the direct flame incinerator. During the investigation, the investigator observed all the exhaust piping from the various areas that vent to the thermal oxidizer.

11. IC – Fabric filter bag houses control PM emissions from the stabilizer storages, stabilizer heaters, the Line 1 stabilizer use bin, and sand application when that equipment is in use. The investigator saw the various baghouses and the new, more efficient baghouse venting PM emissions from the sand application area.

12. IC – Dust collectors control PM emissions from the Line 1 Surfacing Section when that equipment is in use. As mentioned earlier in this report, Line 1 has been removed from operations since early 2019, but these controls were observed during the investigation.

13. IC - The direct flame incinerator was verified to operate at an average temperature of 1450° F during operations and at least 1300° F during standby operations through temperature logs. The optimal operating temperature of 1450° F and 1300° F during standby operations was established during stack testing performed in August 2011

14. IC - The maximum allowable asphalt throughput is 32,063 lbs. /hour for Line 1 and 53,438 lbs. /hour for Line 3. Throughput records verified that both lines were below throughput limits. GAF wishes to keep the actual production numbers confidential. Throughput numbers are available in the City of Dallas Local Program confidential files.

15. IC - The maximum allowable production rates for both Line 1 and Line 3 combined are 171 tons/hour and 1,498,000 tons /year of finished shingles. Production records verified that both lines were below throughput limits. GAF wishes to keep the actual production numbers confidential. Throughput numbers are available in the

City of Dallas Local Program confidential files.

16. IC - No opacity or odor nuisance conditions have been documented by TCEQ or the Dallas Local Air Program at the facility. No opacity or odors were noted during this investigation.

17. IC - All in plant roads are paved and cleaned as necessary. No visible emissions were observed as a result of vehicular traffic at the facility.

18. IC - The stack height of the Line 1 Cooling Section shall be at least 64 ft. from ground level. The Line 3 Cooling Section stack shall be at least 73 ft. from ground level. Records showed that both stacks meet the minimum height requirements.

19. IC - All changes in representations have come with approval by the TCEQ.

20. This Condition authorizes the following facilities by separate Standard Permit: Registration No. 91414 for Filler Transfer Operations for NST-1/Baghouse 1 and NST-1/Baghouse 2. This registration was renewed on May 29, 2019, and it will expire ten years from that date.

**Demonstration of Continuous Compliance**

21. NA - No stack sampling testing has been requested by the TCEQ Executive Director.

22. NA- No stack sampling testing has been requested by the TCEQ Executive Director. However, the facility understands and is prepared to perform stack sampling according to the regulations in this permit.

23. IC - Mr. Bush stated that quarterly visible emission opacity readings are performed at the facility. Opacity reading records were made available during the investigation. No visible emissions have been observed from any of the emission points mentioned in this special condition. If visible emissions are observed the facility is required to:

A. Take immediate action to eliminate visible emissions, record corrective actions, and comply with reporting requirements in 30 TAC 101.201 for emissions event reporting; or

B. Determine opacity using 40 CFR Part 60 Method 9 and report any opacity exceedances under the requirements of 30 TAC 101.201.

24. IC - GAF performs quarterly visible emissions observations. The observations are performed when the facility is in full operation and according to the guidelines in 40 CFR Part 60 Method 9. Opacity reading records were made available during the investigation. All emission points have fully complied with their respective opacity limits specified in this permit.

25. IC - Weekly visible emissions observations are performed for all asphalt storage tanks, storage silos, or mineral handling area. The readings are performed according to the guidelines in 40 CFR Part 60 Method 9 and any opacity exceedances are reported as deviations. Opacity reading records were made available during the investigation. No visible emissions have been observed.

26. IC - Weekly visible emissions observations are performed for any blowing still. The readings are performed according to the guidelines in 40 CFR Part 60 Method 9 and any opacity exceedances are reported as deviations. Opacity reading records were made available during the investigation.

**Compliance Assurance Monitoring**

27. IC - Records of the temperature in the combustion chamber of the thermal oxidizer are recorded four times per hour. The minimum combustion temperature for the thermal oxidizer was set at 1450 ° F. Temperature logs were made available during the investigation.

28. IC - The three-hour average inlet gas temperature for Line 1 and Line 3 asphalt coaters as established in 40 CFR 63 is maintained within the approved operating range. The facility must also maintain a 3-hr average pressure drop on the same control device as established in 40 CFR 63. Facility personnel informed the investigator that these limits were maintained, but the data was not recorded due to the deviation discussed earlier in the report. Personnel stated that visible emission observations were continued to be performed, and no visible emissions were observed. They reason that the lack of visible emissions from this control device indicates that it continued to function properly.

**Sampling Requirements**

29 - 36. NA. These special conditions describe the requirements for stack sampling at the facility. No stack sampling testing has been requested or required by the TCEQ Executive Director.

#### Recordkeeping

37. IC - The following records on a rolling 60-month period were available on-site and available for review during this investigation:

A. Records of the exhaust gas temperature downstream of the thermal oxidizer. One of the temperature logs viewed showed the exhaust gas temperature in line graph form, and it was compared with a line graph that depicted the facility's production activity. The proper temperatures were maintained in the thermal oxidizer for periods of active production and no production.

B. Records of VOC concentration of each vent gas stream for Line 1 and Line 3 cooling sections. These numbers were also reviewed by the investigator and they comply with the MAERT's limits.

C. Hourly asphalt throughput rates for Line 1 and Line 3.

D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles. (These numbers are available in the Dallas Local Program Confidential File)

E. Records of asphalt stored and used that have the potential to emit HAPs. The HAPs annual report was reviewed, and they are compliant with all emission limitations.

F. Records of repairs and maintenance of pollution abatement equipment.

G. Quarterly observations for visible emissions and opacity determinations. As previously mentioned in multiple special conditions earlier in this report, opacity readings are made at the required frequency, using EPA Method 9 for every emission point at the facility. The investigator noted that no visible emissions have been documented.

H. Records of road cleaning or maintenance for dust control.

I. All monitoring data specified in 30 TAC 122.144.

As referenced as part of NSR Permit 7711A in Special Condition 20, Standard Permit #91414 was issued on 12/10/2009 to authorize the installation of two baghouses to control the PM emissions from Line 3 filler transfer operations. This registration was most recently renewed on 05/29/2019.

GAF also was issued PBR Registration #147140 for PBRs 30 TAC 106.261, 106.262, and 106.472 on 01/05/2018. GAF is using this registration to account for emissions from a new storage tank. It was incorporated into NSR Permit 7711A at its next alteration.

An emissions inventory summary for 2018 was available for review during this investigation and GAF was below emission limits in the MAERT. GAF wishes to keep emission information Confidential and a copy of the report is in the City of Dallas Confidential Files.

Time Spent On-site: 1000-1130 hours

#### EXIT INTERVIEW

On 08/13/2019, Mr. Bush was informed, via phone, that the deviations reported in the Title V Semi-Annual Deviation reports represented a single Noted and Resolve Notice of Violation. On the same date, the investigator emailed Mr. Bush and Ms. Latha Kambham, GAF's environmental consultant, an exit interview form (Attachment 1), which officially documented the NOV. They were also informed that GAF did not need to take any further corrective action because the NOV had already been resolved.

#### 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 300-400F°. The material is then transferred to a



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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.

### Compliance History:

RE Name: GAF Materials RN100788959

Classification: High- 0.00

Customer Name: Building Materials Investment Corporation CN605251487

Classification: High- 0.0

Agreed Orders, Court Orders, and Other Compliance Agreements:

No agreed orders, court orders, or other compliance agreements were found for this facility in TCEQ's Central Registry.

Prior Enforcement Issues:

No prior enforcement issues related to the NOV issued in this investigation were found for this facility in TCEQ's Central Registry.

Complaints:

None

### ADDITIONAL INFORMATION:

Conclusions, Recommendations and Current Enforcement Issues:

This investigation resulted in the issuance of a single Noted and Resolved Notice of Violation (NOV) for 30 TAC 116.115(C): Failure to comply with all of the special conditions of Federal Operating Permit O-2771. GAF reported two deviations in their semi-annual deviation reports related to a failure in record keeping. Specifically, these deviations were a noncompliance with Special Condition 7 of the FOP, which references a Special Condition in this site's main NSR Permit (#7711A) that states the facility must be compliant with all applicable regulations in 40 CFR Part 63, Subpart AAAAAAA – Area Sources: Asphalt Processing and Asphalt Roofing manufacture. The requirement for recordkeeping in this federal regulation has the following legal citation: 40 CFR 63.11564(c). On 08/13/2019, the City of Dallas investigator informed Mr. Mr. Kevin Bush of GAF of the Noted and Resolved NOV, via phone. On the same date, the investigator emailed Mr. Bush and Ms. Latha Kambham of Trinity Consultants an Exit Interview Form (Attachment 1), which officially documents this NOV. No further corrective action is needed by GAF. A Noted and Resolved NOV compliance letter will be mailed to Mr. Bush.

Additional Issues: None

Attachments:

1. Exit Interview Form

**NOV Date** 07/29/2019 **Method** WRITTEN

**ALLEGED VIOLATION(S) NOTED AND RESOLVED  
ASSOCIATED TO A NOTICE OF VIOLATION**



Track Number: 724208

Resolution Status Date: 8/13/2019

Violation Start Date: 5/12/2018

Violation End Date: 7/27/2018

30 TAC Chapter 116.115(c)

**Alleged Violation:****Investigation: 1581522**

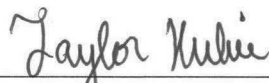
Comment Date: 08/13/2019

Failure to comply with all of the special conditions of Federal Operating Permit O-2771. GAF reported two deviations in the Title V Permit Semi-Annual Deviation reports. The two deviations are actually a singular noncompliance issue spread over two reporting periods. The noncompliance began 05/12/2018 and it was noticed and resolved by 07/27/2018. The deviations represent a noncompliance with Special Condition 7 of the FOP, which states this facility must also comply with the terms and conditions of all New Source Review authorizations issued for this facility, specifically NSR Permit #7711A. Within NSR Permit #7711A, the facility was noncompliant with Special Condition 5B, which states that this facility must comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants (NESHAPS) for source categories in 40 CFR Part 63, Subpart AAAAAAA – Area Sources: Asphalt Processing and Asphalt Roof Manufacturing. The specific citation for which this facility failed to comply is: 40 CFR 63.11564(c). This specific condition states that this facility must maintain complete and thorough records for compliance purposes. Specifically, the facility failed to record monitoring data that determined the functional status of an emission control device that filtered out VOCs from a particular section of the production process. This occurred as a result of the accidental disconnecting of the automatic data recording device. Without this monitoring data for the referenced period, it can not be determined with complete certainty that the emission control device functioned properly for this entire period.

**Recommended Corrective Action:** Ensure all data collection systems used to maintain compliance with federal and state air regulations remain operable in unforeseen problematic circumstances

**Resolution:** GAF personnel installed separate wiring infrastructure to the data recording device (PLC) so that each production line is independently connected to the single PLC. The PLC and entire monitoring system was recalibrated as well. These corrective actions were performed on 07/27/2018

Signed



Environmental Investigator

Date

08/14/2019

Signed



Supervisor

Date

8/19/19

**Attachments: (in order of final report submittal)**

☐ Enforcement Action Request (EAR)

☐ Maps, Plans, Sketches

☒ Letter to Facility (specify type): Exit Interview Form

☐ Photographs

☐ Investigation Report

☐ Correspondence from the facility

☐ Sample Analysis Results

☐ Other (specify):  
\_\_\_\_\_  
\_\_\_\_\_

☐ Manifests

☐ Notice of Registration

## Summary of Investigation Findings

GAF MATERIALS

Investigation #

1581522  
Investigation Date: 07/29/2019

, DALLAS COUNTY,

Additional ID(s): 7711A  
DB0378S  
147140  
DB0378S  
2771  
91414

### ALLEGED VIOLATION(S) NOTED AND RESOLVED

Track No: 724208

30 TAC Chapter 116.115(c)

**Alleged Violation:**

Investigation: 1581522

Comment Date: 08/13/2019

Failure to comply with all of the special conditions of Federal Operating Permit O-2771. GAF reported two deviations in the Title V Permit Semi-Annual Deviation reports. The two deviations are actually a singular noncompliance issue spread over two reporting periods. The noncompliance began 05/12/2018 and it was noticed and resolved by 07/27/2018. The deviations represent a noncompliance with Special Condition 7 of the FOP, which states this facility must also comply with the terms and conditions of all New Source Review authorizations issued for this facility, specifically NSR Permit #7711A. Within NSR Permit #7711A, the facility was noncompliant with Special Condition 5B, which states that this facility must comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants (NESHAPS) for source categories in 40 CFR Part 63, Subpart AAAAAAA – Area Sources: Asphalt Processing and Asphalt Roof Manufacturing. The specific citation for which this facility failed to comply is: 40 CFR 63.11564(c). This specific condition states that this facility must maintain complete and thorough records for compliance purposes. Specifically, the facility failed to record monitoring data that determined the functional status of an emission control device that filtered out VOCs from a particular section of the production process. This occurred as a result of the accidental disconnecting of the automatic data recording device. Without this monitoring data for the referenced period, it can not be determined with complete certainty that the emission control device functioned properly for this entire period.

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Building Materials Investment Corporation  
CN605251487

GAF Materials Corporation  
RN100788959

Investigation No. 1581522

Investigation Date: 07/29/2019

Attachment 01  
Exit Interview Form

## TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

<b>Regulated Entity/Site Name</b>	GAF Materials      2600 Singleton Blvd., Dallas, TX 75212 Building Materials Investment Corporation	<b>TCEQ Add. ID No. RN No (optional)</b>	RN100788959    CN605251487
<b>Investigation Type</b>	SFCI <b>Contact Made In-House (Y/N)</b> Y	<b>Purpose of Investigation</b>	Annual Title V
<b>Regulated Entity Contact</b>	Mr. Kevin Bush	<b>Telephone No.</b>	469-337-4475 <b>Date Contacted</b> 08/13/2019
		<b>FAX #/Email address</b>	<b>FAX/Email date</b> 08/13/2019

**NOTICE:** The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation-report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
1	AV	30 TAC 116.115(C)	Failure to comply with all of the special conditions of FOP O-2771. GAF reported two deviations in their semi-annual deviation reports concerning a noncompliance with Special Condition 7 of the FOP, which references the facility's NSR Permit #7711A. Special Condition 5B of this NSR Permit states that this facility must adhere to all applicable special conditions of the following EPA federal regulation: 40 CFR Part 63, Subpart AAAAAAA: – Area Sources: Asphalt Processing and Asphalt Roofing manufacture. The noncompliance concerned a failure in recordkeeping as required by a condition in this federal regulation.

**Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)**

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Document Acknowledgment.</b> Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.		
Taylor Kubic	08/13/2019	emailed
<b>Investigator Name (Signed &amp; Printed)</b>	<b>Date</b>	<b>Regulated Entity Representative Name (Signed &amp; Printed)</b>
		<b>Date</b>

**If you have questions about any information on this form, please contact your local TCEQ Regional Office.**

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

**White Copy: Regulated Entity Representative**

**Yellow Copy: TCEQ 20085 (4/08)**



August 20, 2019



**CERTIFIED MAIL: 7018 1830 0001 0738 8054**  
**RETURN RECEIPT REQUESTED**

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

**RE: Title V Site Permit Compliance Investigation (SPCI-SFCI) and Noted & Resolved Violation at: GAF Materials Corporation, 2600 Singleton Blvd, Dallas, Texas, TCEQ Account Numbers: RN 100788959, CN 605251487**

Dear Ms. Carleton:

On July 29, 2019, Mr. Taylor Kubic with the City of Dallas Air Pollution Control Program conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for air quality. Enclosed is a summary which lists the investigation findings. During the investigation, certain alleged violations were identified which have been resolved through subsequent corrective action. No further response is required for this investigation.

In the listing of alleged violations, please note the rules themselves and the agency brochure entitled "Obtaining TCEQ Rules" are located at our agency website: [www.tceq.texas.gov](http://www.tceq.texas.gov). Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at (800) 490-9198.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements.

We appreciate that you have resolved the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify DFW Region Office with 10 days from the date of this letter. At that time, the program manager will schedule a violation review meeting to be conducted *within 21 days from the date of this letter*. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Kubic at 214-671-5237.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Marilyn Fitzner'.

Marilyn Fitzner, Interim Manager  
Air Quality Compliance Program  
Office of Environmental Quality

Attachments