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AIRC 100788959-PP. 20180116 - Semi-Annual



GAF MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

January 16, 2018

Executive Director
Texas Commission on Environmental Quality (TCEQ)
c/o Elizabeth Smith
Air Section Manager – Dallas/Fort Worth Regional Office
2309 Gravel Drive
Fort Worth, Texas 76118

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2018
TCEQ
CENTRAL FILE ROOM

RE: *MACT Subpart AAAAAAA Semi-Annual Compliance Certification Report and
Title V Permit Annual Compliance Certification Report and Semi-Annual Deviation Report
Site Operating Permit No. 02771
Building Materials Investment Corporation – Dallas Plant
Customer Reference Number: CN605251487
Regulated Entity Reference Number: RN100788959
TCEQ Account Number: DB-0378-S*

Dear Ms. Smith:

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). The Dallas Plant operates under New Source Review (NSR) Permit No. 7711A, issued on November 25, 2014 and Federal Operating Permit No. O-2771 issued on October 28, 2016.

With this submittal, GAF included the following three submittals that satisfy the reporting requirements for the MACT Subpart AAAAAAA and Title V program:

- > MACT Subpart AAAAA Semi-Annual Compliance Certification (Reporting period from July 1, 2017 to December 31, 2017)
- > Title V Annual Compliance Certification (Certification period from January 1, 2017 to December 31, 2017)
- > Title V Semi-Annual Deviation Report (Reporting period from July 1, 2017 to December 31, 2017)

**MACT SUBPART AAAAAAA SEMI-ANNUAL COMPLIANCE CERTIFICATION
REPORT**

The EPA issued the MACT Subpart AAAAAAA rules (National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing) on November 16, 2009. The GAF Dallas Plant is subject to the MACT Subpart AAAAAAA for Line 1 and Line 3. The emission units subject to this subpart include:

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- > EPN 8: Thermal Oxidizer (TO) - controls emissions from asphalt tanks and blowstills
- > EPN CFL: Coalescing Filter Mist Elimination Systems (CFL) - control emissions from the Line 1 and Line 3 Asphalt Coaters
- > EPN 34: Electrostatic Precipitator (ESP) as backup to CFL

In accordance with 40 CFR §63.11564(b), each semi-annual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. On July 14, 2017, the GAF Dallas Plant submitted the MACT Subpart AAAAAAA Semi-Annual Compliance Certification Report for reporting period January 1, 2017 to June 30, 2017. With this letter, GAF is submitting the compliance report to demonstration compliance with MACT Subpart AAAAAAA for reporting period from July 1, 2017 to December 31, 2017. The detailed compliance demonstration is included in Attachment 1.

TITLE V PERMIT ANNUAL COMPLIANCE CERTIFICATION AND SEMI-ANNUAL DEVIATION REPORT

~~There were no deviations at GAF Dallas Plant during the reporting period from July 1, 2017 to December 31, 2017. The compliance certification for the annual reporting period from January 1, 2017 to December 31, 2017 is provided in Attachment 2. The certification by Responsible Official (RO) (Form OP-CRO1) is provided in Attachment 3.~~

If you have any questions or comments, please contact Ms. Lele Bao with Trinity Consultants at 972-661-8100.

Sincerely,



Bruce Dahlgren
Plant Manager

cc: US EPA, Region 6, Air Enforcement 6EN-A
Mr. Brian Cunningham, City of Dallas (electronic copy)
Mr. Kevin Bush, GAF
Mr. Durwin Farlough, GAF
Mr. Steve Emmons, GAF
Ms. Latha Kambham, Trinity Consultants
Ms. Lele Bao, Trinity Consultants

ATTACHMENT 1. MACT AAAAAAA COMPLIANCE REPORT

MACT AAAAAAA Compliance Report is included in this Attachment.

> *Per 40 CFR (§) 63.11564 (b)(1),*

(b) You must submit a compliance report as specified in paragraphs (b)(1) through (b)(4) of this section.

(1) If you are using a control device to comply with the emission limits, the compliance report must identify the controlled units (e.g., blowing stills, saturators, coating mixers, coaters). If you are not using a control device to comply with the emission limits, the compliance report must identify the site-specific process operating parameters monitored to determine compliance with the emission limits.

GAF Dallas Plant is using the following three control devices to comply with the emission limits:

- > EPN 8: Thermal Oxidizer (TO) - controls emissions from asphalt tanks and blowstills
- > EPN CFL: Coalescing Filter Mist Elimination Systems (CFL) - control emissions from the Line 1 and Line 3 Asphalt Coaters
- > EPN 34: Electrostatic Precipitator (ESP) as backup to CFL

> *Per 40 CFR (§) 63.11564 (b)(2),*

(2) During periods for which there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, the compliance report must contain the information specified in paragraphs (b)(2)(i) through (b)(2)(v) of this section.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) A statement that there were no deviations from the emission limitations during the reporting period.

(v) If there were no periods during which the CPMS was out-of-control as specified in § 63.8(c)(7), a statement that there were no periods during which the CPMS was out-of-control during the reporting period.

Company Name: Building Materials Investment Corporation

Address: 2600 Singleton Boulevard, Dallas, TX 75212

Responsible Official name: Bruce Dahlgren

Title: Plant Manager

Date of Report: January 16, 2018

Reporting Period: July 1, 2017 to December 31, 2017

There are no deviations from the emission limitations during the reporting period from July 1, 2017 to December 31, 2017. The CPMS units are always in control during the reporting period.

> Per 40 CFR (§) 63.11564 (b)(3),

(3) For each deviation from an emission limitation (emission limit and operating limit), you must include the information in paragraphs (b)(3)(i) through (b)(3)(xii) of this section.

(i) The date and time that each deviation started and stopped.

(ii) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.

(iii) The date, time and duration that each CPMS was out-of-control, including the information in § 63.8(c)(8).

(iv) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(v) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(vi) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(vii) A summary of the total duration of CPMS downtime during the reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that reporting period.

(viii) An identification of each air pollutant that was monitored at the affected source.

(ix) A brief description of the process units.

(x) A brief description of the CPMS.

(xi) The date of the latest CPMS certification or audit.

(xii) A description of any changes in CPMS or controls since the last reporting period.

There is no deviation from emission limitations since the GAF Dallas Plant during the reporting period from July 1, 2017 to December 31, 2017. Therefore, this requirement does not apply.

> Per 40 CFR (§) 63.11564 (b)(4),

(4) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report specified in paragraph (b) of this section according to the following dates:

(i) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in § 63.11560 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in § 63.11560.

(ii) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in § 63.11560.

(iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iv) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

Per 40 CFR (§) 63.11564 (b)(4)(iii) and (iv), GAF is submitting the semiannual compliance report to demonstrate compliance with MACT Subpart AAAAAAA from July 1, 2017 to December 31, 2017, by the due to date of January 31, 2017.

ATTACHMENT 2. PERMIT COMPLIANCE CERTIFICATION

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification - PCC (Part 1)

AIR CO/ 100788959

/RP

Permit Holder Name	Building Materials Investment Corporation
Area Name	Dallas Plant
Operating Permit Number	O 2771
Certification Period Start Date	1/1/2017

Customer Number /CN	CN 605251487
Account Number	DB-0378-S
Report Submittal Date	Jan 16, 2018
End Date	Dec 31, 2017

I. Certification of Continuous Compliance with Permit Terms and Conditions

(Indicate response by placing a 'x' in the appropriate column for each of the following questions)

Response:

With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?

☒ Yes

☐ No

II. Summary of Deviations

(Indicate response by placing a 'x' in the appropriate column for each of the following questions)

Response:

A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency?

If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal.

Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.

☐ Yes

☒ No

B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency?

If the answer to this questions is 'Yes', please include the relevant reports along with this page.

☐ Yes

☒ No

ATTACHMENT 3. TCEQ FORM OP-CRO1

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information					
RN: 100788959		CN: 605251487		Account No.: DB-0378-S	
Permit No.: O-2771			Project No.:		
Area Name: Dallas Plant			Company Name: Building Materials Investment Corporation		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Annual Compliance Certification and Semi-Annual Deviation Report</u>					
IV. Certification of Truth					
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>Bruce Dahlgren</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i></p> <p>Specific Dates: <u>01/16/2018</u> _____ <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i></p>					
Signature: <u>B. Dahlgren</u>			Signature Date: <u>1/17/2018</u>		
Title: <u>Plant Manager</u>					