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GAF MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

July 30, 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

RE: *MACT Subpart AAAAAAA Semi-Annual Compliance Certification Report and
Title V Permit 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*

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**TCEQ
CENTRAL FILE ROOM**

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 AAAAAAA Semi-Annual Compliance Certification (Reporting period from January 1, 2018 to June 30, 2018)
- > Title V Semi-Annual Deviation Report (January 1, 2018 to June 30, 2018)

**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:

- > 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

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DFW REGION-4

Ms. Elizabeth Smith - Page 2
July 30, 2018

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. With this letter, GAF is submitting the compliance report to demonstration compliance with MACT Subpart AAAAAAA for reporting period from January 1, 2018 to June 30, 2018. The detailed compliance demonstration is included in Attachment 1.

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


GAF identified one deviation during this period. The deviation is related to the CFL monitoring system. As noted above, emissions from Line 1 and Line 3 Asphalt Coaters are controlled by CFL. As part of continuous demonstration of compliance, the Dallas Plant is required to monitor the inlet temperature to the filter system and pressure drop across the filter (Table 4 to Subpart AAAAAAA of Part 63). The Dallas Plant uses a Programmable Logic Controller (PLC), to record these readings, which are stored in the Continuous Parameter Monitoring System (CPMS). A single CFL system is used for both the lines, with all measurement wiring for PLC connected to Line 1. However, Line 1 has not been in operation recently and the PLC system failed on May 12, 2018. The Plant did not realize readings from the CFL were also being transmitted by the Line 1 system. The Dallas Plant identified this issue and has installed new wiring to deliver the CFL monitoring data directly to Line 3 communications system beginning July 27, 2018. Therefore, although the emissions from Line 3 Asphalt Coater were being controlled by the CFL as required, the temperature readings were not recorded.

GAF did not observe any unusual visible emissions during period, which indicates the control system was performing well. There were no other deviations at the Dallas Plant during this reporting period.

The deviation report for the reporting period is provided in Attachment 2. The certification by Responsible Official (RO) (Form OP-CR01) is provided in Attachment 3.

If you have any questions or comments, please contact Ms. Latha Kambham 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. 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: July 30, 2018

Reporting Period: January 1, 2018 to June 30, 2018

There are no deviations from the emission limitations during the reporting period from January 1, 2018 to June 30, 2018.

However, although the emissions from Line 3 Asphalt Coater were being controlled by the CFL as required, the temperature readings were not recorded on the CPMS during this reporting period (i.e., CPMS was not operational), beginning May 12, 2018.

> 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.

As detailed in the cover letter, the CPMS system was disconnected beginning May 12, 2018 accidentally, when the plant was disconnecting Line 1 monitoring system, since it has not been in operation. Same wiring is used for both line, Line 1 and Line 3. Therefore, Line 3 CFL readings were not recorded. Additional information is provided below.

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

May 12, 2018 – June 30, 2018 (Resolved on July 27, 2018)

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

May 12, 2018 – June 30, 2018 (Resolved on July 27, 2018)

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

N/A (the CPMS was not operational during this time)

(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.

May 12, 2018 – June 30, 2018 (Resolved on July 27, 2018)

(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.

CPMS was down for 49 days, approximately 27% of the source (i.e., Line 3 Asphalt Coater) operating time during this 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.

Same as above

(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.

CPMS was down for 49 days, approximately 27% of the source (i.e., Line 3 Asphalt Coater) operating time during this reporting period.

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

N/A. CPMS monitors inlet temperature and pressure drop.

(ix) A brief description of the process units.

In Asphalt Roofing Line 3, a dry non-woven fiberglass mat is fed into the roofing machine from an unwind stand. A mechanical splicer and an accumulator are provided so that the rolls can be fed in sequence by splicing without interruption of the operation. The unwind stand and the accumulator are vented to a dust collector (EPN 25).

The fiberglass mat is next carried through the coating section, where coating asphalt mixed with stabilizer (i.e., crushed limestone) is applied to both surfaces of the mat. This section of the machine is vented to a coalescing filter mist elimination system (CECO) (EPN CFL) with an Electrostatic Precipitator (ESP) (EPN 34) as backup.

(x) A brief description of the CPMS.

The CPMS in use at this facility includes a probe at the point of measurement followed by a Programmable Logic Controller (PLC) followed by a digitally maintained database. A Dwyer Series 605 "Magnehelic" Pressure Indicating Transmitter is used for determining differential pressure for the CECO filter system (EPN CFL). The CPMS which includes this device consists of the pressure indicating transmitter and an associated PLC. The PLC is programmed to record the signal on a ten-minute cycle. Pressure readings are maintained electronically for a minimum of five years.

Two Status Instruments SEM203P Temperature Transmitters are used to for determining influent temperature of CECO and ESP systems used at the Dallas Plant. The CPMS which includes this device consists of the Temperature Indicating Transmitters and an associated PLC. The PLC is programmed to record the signal on a ten-minute cycle. Temperature readings are maintained electronically for a minimum of five years.

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

July 27, 2018

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

Routed new wiring to deliver measurement data directly to Line 3 communications/database, no longer connected via Line 1.

> 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 January 1, 2018 to June 30, 2018, by the due to date of July 31, 2018.

ATTACHMENT 2. DEVIATION REPORT



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)**

Permit Holder Name		Building Materials Investment Corporation				Customer Number	CN605251487
Area Name		Dallas Plant				Account Number	DB-0378-S
Report Period Start Date	1/1/2018	Report Period End Date	6/30/2018	Operating Permit Number	O2771	Report Submittal Date	07/30/2018

Operating Permit Requirement for Which Deviations are Being Reported


ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
Line 3		Applicable Requirements Summary	PM	§ 63.11564(c)	Record	63AAAAAAA-2	N/A	Continuous

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation			
		Start		End							
		Date	Time	Date	Time						
1		5/12/2018		6/30/2018		1	PLC System wiring was accidentally disconnected, which resulted in missing records of monitored data during this period for CFL associated with Line 3 Asphalt Coater	The plant has installed new wiring to connect the PLC to Line 3 communications system. The issue was resolved on July 27, 2018.			
Total Deviations:						1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?				
							<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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>MACT Subpart AAAAAAA Compliance Certification and Semi-Annual Deviation Report</u>					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
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>					
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:					
<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>					
Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i>					
Specific Dates: <u>07/30/2018</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>					
Signature: <u></u>			Signature Date: <u>7/30/2018</u>		
Title: <u>Plant Manager</u>					

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