



GAF MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

July 23, 2014

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

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TCEQ
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RE: MACT Subpart AAAAAAA Semi-Annual Compliance Certification Report
Building Materials Corporation of America, GAF - Dallas Plant
Customer Reference Number: CN602717464
Regulated Entity Reference Number: RN100788959
TCEQ Account Number: DB-0378-S

Dear Sir/Madam:

Building Materials Corporation of America 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) 602717464. The Dallas Plant has been assigned TCEQ Air Quality Account Number DB-0378-S and Regulated Entity Number (RN) 100788959. The Dallas Plant operates under New Source Review (NSR) Permit No. 7711A, issued on June 14, 2013 and Federal Operating Permit No. O-2771 issued on April 18, 2011.

The EPA issued the Maximum Achievable Control Technology (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

In accordance with 40 CFR §63.11564(b), each semiannual 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. On January 27, 2014, the GAF Dallas Plant submitted the MACT Subpart AAAAAAA Semi-Annual Compliance Certification Report for reporting period from July 1, 2013 to December 31, 2013. With this letter, GAF is submitting the compliance report to demonstrate compliance with MACT Subpart AAAAAAA for reporting period from January 1, 2014 to June 30, 2014.

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> 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.

As identified above, 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 Corporation of America

Address: 2600 Singleton Boulevard, Dallas, TX 75212

Responsible Official name: Bruce Dahlgren

Title: Plant Manager

Date of Report: July 23, 2014

Reporting Period: January 1, 2014 to June 30, 2014

There are no deviations from the emission limitations during the reporting period from January 1, 2014 to June 30, 2014. The CPMS units are always in control during the reporting period.

> Per 40 CFR (§) 63.11564 (b)(3),

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(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 January 1, 2014 to June 30, 2014. 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.

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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, 2014 to June 30, 2014, by the due to date of July 31, 2014.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Dahlgren', with a long horizontal flourish extending to the right.

Bruce Dahlgren
Plant Manager

cc: Ms. Elizabeth Smith, Air Section Manager – TCEQ Region 4
Mr. Brian Cunningham, City of Dallas (electronic copy)
Mr. Kevin Bush, GAF
Mr. Durwin Farlough, GAF
Mr. Steven Emmons, GAF
Ms. Latha Kambham, Trinity Consultants