

AIR CO/DB0378S/RN100788959/RP/08-21-2014/Investigation Report
City of Dallas, Air Pollution Control Program
Investigation Report

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Customer: Building Materials Corporation of America
Customer Number: CN602717464

Regulated Entity Name: GAF MATERIALS

Regulated Entity Number: RN100788959

Investigation # 1192155

Investigator: BRIAN CUNNINGHAM

Conducted: 08/14/2014 -- 08/21/2014

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

Investigation Type: Compliance Invest File Review

Additional ID(s): 7711A
DB0378S
2771

Incident Numbers

Site Classification MAJOR SOURCE

SIC Code: 2952

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

RESPONDENT

Name

BUILDING MATERIALS CORPORATION OF AMERICA

Contact(s):

Role

Regulated Entity
Mail Contact

Title

PROJECT ENGINEER

Name

MR DURWIN
FARLOUGH

Phone

Work (214) 637-8977

Other Staff Member(s):

Role

QA Reviewer
Supervisor
Supervisor

Name

JONI KEACH
AMANDA MOORE
JONI KEACH

Associated Check List

Checklist Name

AIR ANNUAL COMPLIANCE CERTIFICATION
REVIEW - OPCC

Unit Name

Facility

Investigation Comments:

INTRODUCTION

RECEIVED

SEP 17 2014

TCEQ
CENTRAL FILE ROOM

RECEIVED

SEP 09 2014

TCEQ DFW REGION 4

Compliance & Enforcement/ Reports

1st: DB0378S Vol: 001 8/14/2014 - 8/14/2014

CBC 100610877

IBC: 100696017



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This investigation was conducted as an office permit compliance certification (OPCC) investigation for, Materials Corporation of America (GAF Materials) located at 2600 Singleton Blvd, Dallas, TX. The purpose of this investigation was to confirm compliance with annual compliance certification requirements 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.

GAF is authorized to operate under Federal Operating Permit (FOP) GAF currently operates under Federal Operating Permit O-2771, issued on 03/9/06 and NSR Air Permit No. 7711A, initially issued on 07/7/86 and recently altered on 06/14/13. GAF is a major source of Sulfur Dioxide (SO₂), nitrogen oxides (NO_x) and Particulate Matter (PM₁₀).

The last investigation for this facility was a site permit compliance investigation (SPCI) conducted by the Dallas Local Air Program on 07/29/13 in which no deficiencies or violations were noted (CEEDS No.1109847). This investigation will review the Annual Permit Compliance Certification (PCC) and deviations for the compliance period of 03/09/13 through 03/09/14 for Permit No. O-2771. Also the reporting requirements under MACT Subpart AAAAAAA were evaluated during this investigation.

Daily Narrative

On 08/14/14, Brian Cunningham, investigator with the Dallas Local Air Program, conducted an in-house file review of GAF. According to the records, GAF submitted the following Title V compliance certification documents for the period to the TCEQ DFW Region Office (and copies to the Dallas Local Air Program):

- An annual PCC for the period of 03/09/13 through 03/08/14 was submitted on 04/03/14. A copy of the report was received by the Dallas Local Program on 04/03/14. GAF indicated that no deviations under permit requirements occurred during the reporting period. A Form OP-CRO1, signed and dated by the designated responsible official was included.

- A semiannual Deviation Report from the period of 03/09/13 through 09/08/13 was signed on 10/01/13 and received by the Dallas Local Program on 10/02/13. GAF reported that no deviations occurred.

- A second semiannual Deviation Report from the period of 09/09/13 through 03/08/14 was signed on 04/03/14 and received by the Dallas Local Program on the same date. GAF reported that no deviations occurred.

- A semiannual MACT Subpart AAAAAAA compliance certification report for the period of 07/01/13 through 12/31/13 was signed on 01/27/14 and received by the Dallas Local Program on the same date. GAF indicated that no deviations under permit requirements occurred during the reporting period.

- A second semiannual MACT Subpart AAAAAAA compliance certification report for the period of 01/01/14 through 06/30/14 was signed on 07/23/14 and received by the Dallas Local Program on the same date. GAF indicated that no deviations under permit requirements occurred during the reporting period.

The PCCs and deviation reports were submitted within 30 days after the end of each certification period, as required by 30 TAC 122.146(2).

GAF did not report any emissions events to the TCEQ DFW Region Air Section within the reporting period.

Exit Interview:

NA. All required reports and documentation was available during the file review. No violations were noted during this investigation.

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

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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, headlap (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 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

Compliance history rating/classification for regulated entity: Satisfactory - 3.59

Compliance history rating/classification for customer: Satisfactory - 3.11

Current Enforcement Issues: None

Agreed Orders, Court Orders, and other Compliance Agreements: Agreed Order #2008-0805-AIR-E

Complaints: None

Prior Enforcement Issues: See Attached Central Registry Report (Attachment 1)

ADDITIONAL INFORMATION:

Conclusions and Recommendations:

GAF appears to be in compliance with the annual compliance certification requirements of 30 TAC Chapter 122 for the investigated reporting period. No alleged violations were noted as a result of this investigation. A General Compliance letter will be sent to the facility.

Additional Issues:

None

ATTACHMENT

1. Central Registry Report Page

No Violations Associated to this Investigation

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Signed Bruce C. [Signature]
Environmental Investigator

Date 8/26/14

Signed Tom M. Kersch [Signature]
Supervisor

Date 8/27/14

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):

1) Central Registry report

Attachment 1

1 Page

DB0378S RN100788959 CN602717464

Building Materials Corporation of America

GAF Materials Corporation - Dallas Plant

August 14 -21, 2014

Questions or Comments >>

Main Query Page

Program Area Search

Compliance History					
RE Name:	GAF MATERIALS			RN:	RN100788959
Classification:	SATISFACTORY	Rating:	0.73	Publication Date:	Nov 15, 2013
Customer Name	BUILDING MATERIALS CORPORATION OF AMERICA			CN:	CN602717464
Classification:	SATISFACTORY	Rating:	0.63	Publication Date:	Nov 15, 2013
Repeat Violator Ind:	NO				

Compliance History Start: 08/31/2013

End: 09/01/2008

Submit

1-3 of 3 Enforcement Action Records

Enforcement Actions				
Type	Effective Date	Citation/Requirement Provision	Abb. Description	Violation Classification (Trk No)
ADMINORDER	Feb 8, 09	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F); 5C THSC Chapter 382 382.085(b) PERMIT Sp. Cond. 1 Not applicable to CH	Failed to comply with the permitted MAERT for the thermal oxidizer stack ("EPN 8") as determined during stack testing.	MINOR (353482)
ADMINORDER	Feb 8, 09	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F); 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT 7711A Special Condition 1 Not applicable to CH	Failed to comply with the permitted Maximum Allowable Emissions Rate Table ("MAERT") for the line 3 cooling section ("EPN No. COOL3") as determined during stack testing.	MODERATE (218795)
ADMINORDER	Feb 8, 09	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F); 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT SC 9 Not applicable to CH	Failed to conduct stack testing on EPN COOL1. Specifically, Special Condition No. 9 requires that it be sampled 180 days after the issuance of the permit dated October 21, 2004, which was no later than April 19, 2005.	MODERATE (218808)

0 convictions returned

Criminal Convictions					
Conviction Date	Number of		Violations		
	Felonies	Misdemeanors	Citation/Requirement Provision	Abb. Description	Classification (Trk No)

0 events returned

Chronic Excessive Emissions Events			
Start Date	Status Code	Status Date	Track Number

1-12 of 12 Investigation Records

Investigations		
Investigation Start Date	Type	Investigation Status Date
Apr 1, 2009	Compliance Investigation	Apr 20, 2009
Apr 16, 2009	Compliance Invest File Review	Apr 20, 2009
Jun 23, 2009	Compliance Investigation	Jun 30, 2009
Dec 8, 2009	Compliance Invest File Review	Dec 23, 2009
Feb 23, 2010	Compliance Investigation	Mar 3, 2010
Feb 9, 2010	Compliance Invest File Review	Mar 23, 2010
Jul 15, 2010	Compliance Invest File Review	Jul 28, 2010
Dec 21, 2010	Compliance Invest File Review	Dec 21, 2010
Jun 23, 2011	Compliance Investigation	Aug 10, 2011
Aug 9, 2012	Compliance Invest File Review	Aug 27, 2012



August 28, 2014

Mr. Durwin Farlough
GAF Materials Corporation
2600 Singleton Boulevard
Dallas, TX 75212

RE: Title V Office Permit Compliance Investigation (OPCC) at GAF Materials Corporation, 2600 Singleton Boulevard, (Dallas County), Texas, TCEQ Account Numbers: RN 100788959, CN 602717464, DB0378S

Dear Mr. Farlough:

From August 14 through August 21, 2014, Mr. Brian Cunningham 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 Mr. Cunningham at 214/948-4203.

Sincerely,

A handwritten signature in black ink, reading 'Joni M. Keach'.

Joni M. Keach, R.S., Manager
Air Quality Compliance Program
Public Works Department