Construction Permit Amendment
Review Analysis & Technical Review

Company:	**Building Materials Corporation Of America**	Permit No.:	**7711A**
City:	**Dallas**	Record No.:	**122055, 124014**
County:	**Dallas**	Account No.:	**DB-0378-S**
Project Type:	**CAMD, CRVN**	Regulated Entity No.:	**RN100788959**
Project Reviewer:	**Alex Berksan, PE**	Customer Reference No.:	**CN602717464**
Facility Name:	**Asphalt Roofing Materials Manufacturing Facility**		

Authorization Checklist

Will a new policy/precedent be established? (ED signature required if yes)	**No**
Is a state or local official opposed to the permit?(ED signature required if yes)	**No**
Is waste or tire derived fuel involved? (ED signature required if yes)	**No**
Are waste management facilities involved?(ED signature required if yes)	**No**
Will action on this application be posted on the Executive Director's agenda?	**Yes**
Have any changes to the application or subsequent proposals been required to increase protection of public health and the environment during the review?	**No**

Project Overview

Building Materials Corporation of America (formerly GAF Materials Corporation) requested an amendment of their permit to update the MAERT with a VOC emission rate obtained from testing on EPN 34 (Electrostatic Precipitator Stack). A subsequent alteration request was received to revise the emissions of a boiler (EPN 8), which was replaced under PBR 106.264. No comments were received during the public notice and comment period.

Compliance History

In compliance with 30 TAC Chapter 60, a compliance history report was prepared on:	**February 5, 2007**
Was the application received after September 1, 2002?	**Yes**
If yes, what was the site rating? **0.6 average** Company rating? **0.3 average**	
Is the permit recommended to be denied or has the permit changed on the basis of compliance history or rating?	**No**

Public Notice Information

§39.403 Public notification required? **Yes**

A. Date application received: April 07, 2006 Date Administrative Complete: **4/25/2006**

B. Small Business source? **No**

§39.418 C. Date 1st Public Notice /Admin Complete/Legislators letters mailed: **4/25/2006, 5/5/2006**

§39.603 D. Pollutants: **organic compounds**

E. Date Published: **5/23/2006** in ***The Dallas Morning News***
Date Affidavits/Copies received: **6/1/2006, 7/31/2006**

F. Bilingual notice required? **Yes**
Language: **Spanish**
Date Published: **5/23/2006** in ***Al Día***
Date Affidavits/Copies received: **6/1/2006, 7/31/2006**

§39.604 G. Certification of Sign Posting / Application availability **Recd 6/1/2006**

H. Public Comments Received? **No**

§39.419 2nd Public Notification required? **No**

If no, give reason: **No hearing request received during first notice.**

Emission Controls

§116.111(a)(2)(G) Is the facility expected to perform as represented in the application? **Yes**

§116.140 Permit Fee: **$900** Fee certification provided? **R638136**

Sampling and Testing

§116.111(a)(2)(A)(I) Are the emissions expected to comply with all TCEQ air quality rules and regulations, and the

	intent of the Texas Clean Air Act?	**Yes**
§116.111(a)(2)(B)	Will emissions be measured?	**Yes**
	Method: **Sampling, record keeping.**	

Federal Program Applicability

§116.111(a)(2)(D)	Compliance with applicable NSPS expected?	**Yes**
	Subparts A and UU, Asphalt Processing and Asphalt Roofing Manufacture	
§116.111(a)(2)(E)	Compliance with applicable NESHAP expected?	**N/A**
§116.111(a)(2)(F)	Compliance with applicable MACT expected?	**N/A**
§116.111(a)(2)(H)	Is nonattainment review required?	**No**
	A. Is the site located in a nonattainment area?	**Yes (ozone-moderate)**
	B. Is the site a federal major source for a nonattainment pollutant?	**No**
	C. Is the project a federal major source for a nonattainment pollutant by itself?	**No**
	D. Is the project a federal major modification for a nonattainment pollutant?	**No**
116.111(a)(2)(I)	Is PSD applicable?	**No**
	A. Is the site a federal major source (100/250 tons/yr)?	**No**
	B. Is the project a federal major source by itself?	**No**
	C. Is the project a federal major modification?	**No**

Mass Cap and Trade Applicability

§116.111(a)(2)(L)	Is Mass Cap and Trade applicable?	**No**
	Did the proposed facility, group of facilities, or account obtain allowances to operate?	**N/A**

Title V Applicability

§122.10(13)(A)	Is the site a major source under FCAA Section 112(b)?	**No**
	(I). The site emits 10 tons or more of any single HAP?	**No**
	(ii). The site emits 25 tons or more of a combination	**No**
§122.10(13)(C)	Does the site emit 100 tons or more of any air pollutant?	**Yes (119 tpy PM_{10})**
§122.10(13)(D)	Is the site a nonattainment major source?	**Yes**

Request for Comments

Region:	**4 DFW**	Reviewed by:	**Deferred to City of Dallas**
City:	**Dallas**	Reviewed by:	**Amanda Trammel 1/22/2007**

Process Description

The plant manufactures asphalt shingles for the roofing industry. A dry, nonwoven fiberglass mat is fed into the roofing machine from an unwind stand. The fiberglass is carried through the coating section, where coating asphalt mixed with a stabilizer (limestone) is applied to both surfaces of the mat. The coating operation is followed by the surfacing section. Ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and itself in the finished package. The hot sheet, with a mineralized surface, then goes into the cooling section of the machine. Cooling is accomplished by passing the web over a series of water-cooled drums, through water mist sprays and between air jets. It is then accumulated in the looper section of the machine to provide surge capacity required prior to cutting. Self-seal striping dots are then applied and the sheet is cut into shingles and automatically packaged.

The boiler in question accepts the thermal oxidizer exhaust for preheating recovery and fires as necessary to meet the steam needs of the plant.

Sources, Controls, Source Reduction and BACT [§116.111(a)(2)(C)]

VOC emissions listed for EPN 34, Electrostatic Precipitator Stack, were found to be 5.76 lb/hr, instead of the permitted 3.20 lb/hr. This ESP controls emissions from the coating portion of the process. The annual emissions were revised to 25.23 tons/yr from the permitted 14.94 tons/yr.

The waste heat boiler (EPN 8) was replaced under PBR 106.264 and the revised emissions are included in this amended permit. The change in emissions from EPN 8 is as follows (tons/yr):

	NO_x	SO_2	PM_{10}	CO	VOC
Before	7.70	3.20	21.90	5.60	0.40
After	3.16	3.18	21.90	5.53	0.37
Δ	-4.54	-0.02	0	-0.07	-0.03

Use of the ESP to control emissions from the coating operations is consistent with current BACT. The boiler does not have any controls and that also is acceptable under today's BACT.

Impacts Evaluation

1. Was modeling done? **Yes** Type? **Screen**
2. Will GLC of any air contaminant cause violation of NAAQS? **No**
3. Is this a sensitive location with respect to nuisance? **Yes (David Morris, City of Dallas EHS site review)**
4. Is the site within 3000 feet of any school? **No**
5. Toxics Evaluation:

The applicant's technical consultant (Christine Otto, Trinity Consultants, Dallas) followed the flowchart in the Modeling and Effects Review Applicability guidance document. Since the concentration due to the emission increase was ≤0.1xESL, no further modeling or effects review was required.

Miscellaneous

1. Is applicant in agreement with special conditions? **Yes**
   Company representative? **Christine Otto, phone 2/6/2007**
2. Emission reductions from source reduction or pollution prevention **None**
3. Emissions reductions resulting from the application of BACT required by state rules, avoidance of potential impacts problems, and voluntary reductions **None**
4. Other permit(s) affected by this action? **No**

Project Reviewer Date Team Leader/Section Manager/Backup Date