0000-0000-0007-9450

Document Control Sheet

Sheet Title:	AIR NSR - RLM
Box ID:	6057
Control Sheet ID:	0000-0000-0007-9450
Record Series Name:	AIR / New Source Review Permit
Record Series:	AIR NSR
Primary ID:	100788959
Secondary ID:	7711A
Doc Type:	Permits
Security:	Public
Date:	4/20/2018
Title:	Working File Folder
Tertiary ID	282350

Return to Sharenet

04/12/2018 ----------NSR IMS - PROJECT RECORD ----------

PROJECT#: 282350 STATUS: PENDING

PROJECT ADMIN NAME: ASPHALT ROOFING MATERIALS MANUFACTURING FACILITY

PROJECT TECH NAME: ASPHALT ROOFING MATERIALS MANUFACTURING FACILITY

PROJECT ACTIONS

Permit	Action Type	Permit Type	Received Date	Permit Status	Renewal Date	Action Status	Complete Date
7711A	AMEND	CONSTRUCT	02/27/2018	EFFECTIVE	11/25/2024	~~PENDING~~ C	4/20/18

Assigned Team: MECHANICAL TEAM

RECEIVED
MAY 17 2018
TCEQ CENTRAL FILE ROOM

STAFF ASSIGNED TO PROJECT:

BANIGO , JANA	- REVIEWR1_2 -	AP INITIAL REVIEW
STUMP , STEVEN	- REVIEW ENG -	MECHANICAL TEAM

COMPANY INFORMATION

Issued To	Company Name	Customer Reference Number
BUILDING MATERIALS INVESTMENT CORPORATION	Building Materials Investment Corporation	CN605251487

- CONTACT INFORMATION

Contact Type	Name	Title	Organization Name
RESPONSIBLE OFFICIAL	MR BRUCE DAHLGREN	PLANT MANAGER	BUILDING MATERIALS INVESTMENT CORPORATION

Phone	FAX	Address
(214) 637-8970	(214) 637-5202	2600 SINGLETON BLVD, DALLAS, TX, 75212-3738

EMAIL: BRUCE.DAHLGREN@GAF.COM

Contact Type	Name	Title	Organization Name
TECHNICAL CONTACT	MR KEVIN BUSH	SR ENVIRONMENTAL ENGINEER	BUILDING MATERIALS INVESTMENT CORPORATION

Phone	FAX	Address
(972) 872-2325	(214) 637-5202	2600 SINGLETON BLVD, DALLAS, TX, 75212-3738

EMAIL: KEVIN.BUSH@GAF.COM

PERMIT INFORMATION

REGULATED ENTITY NUMBER: RN100788959

Permit	Account	Permittee Name	County	Region	City	State	Location
7711A	DB0378S	GAF MATERIALS	DALLAS	REGION 04 - DFW METROPLEX	DALLAS	TEXAS	2600 SINGLETON BLVD DALLAS TX 75212

- PERMIT AFFILIATION:

Permit1	Related Permit 2	Relationship Type	Start Date

PROJECT NOTES:

03/02/2018	SOS/DFC; NOT ON APWL; PAYMENT CLEARED ON 3/1/2018; LEG LTR DOC#598740
03/02/2018	ELECTRONIC CORRESPONDENCE REQUESTED BY APPLICANT

- PERMIT NOTES:

12/09/2009	INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL
06/15/2017	AS REFERENCED IN 30 TAC § 116.116(D)(2), ALL CHANGES AUTHORIZED UNDER PBR 147140 TO A PERMITTED FACILITY SHALL BE INCORPORATED INTO THE NSR PERMIT NO. 7711A WHEN IT IS AMENDED OR RENEWED.

- FEE

Permit	Action Type	Reference	Fee Receipt Number	Fee Amount Paid	Fee Refund Amount	Fee Receipt Date	Fee Payment Type
7711A	AMEND	637612	M817366	5683.00		03/01/2018	CHECK

- TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
ADMIN DEFICIENCY CYCLE	02/27/2018	03/02/2018
APIRT RECEIVED PROJECT (DATE)	02/27/2018	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	03/02/2018	
ENHANCED ADMINISTRATIVE OR APPLICATIONS REVIEW (EAR)	03/02/2018	03/02/2018
LEGISLATORS NOTIFIED OF APPLICATION RECEIVED (DATE)	03/02/2018	
SITE REVIEW RFC SENT TO REGION (DATE)	03/02/2018	
COMPLIANCE HISTORY REVIEW COMPLETED (DATE)	03/05/2018	
PROJECT RECEIVED BY ENGINEER (DATE)	03/05/2018	
PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)	03/05/2018	
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)	04/12/2018	
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)	04/12/2018	
CENTRAL REGISTRY UPDATED		
WORKING DRAFT PERMIT REVIEW CYCLE		

UNIT TYPES:

- Permit Unit Type:

Industry Group	Industry Type	Source Type	Control/BACT Type	Start Date	End Date
MECHANICAL	ASPHALT ROOFING			01/26/2009	

Permit Amendment
Source Analysis & Technical Review

Company	**Building Materials Investment Corporation**	Permit Number	**7711A**
City	**Dallas**	Project Number	**282350**
County	**Dallas**	Regulated Entity Number	**RN100788959**
Project Type	**Amend**	Customer Reference Number	**CN605251487**
Project Reviewer	**Steven Stump**		
Site Name	**Asphalt Roofing Materials Manufacturing Facility**		

Project Overview

Building Materials Investment Corporation requested an amendment of their permit which authorizes an asphalt roofing production facility. With this amendment, the company requests to remove one of the existing blowstills (Facility Identification Number [FIN]: 26) with a new blowstill. The new blowstill functions in a similar manner as the existing blowstill. Although, the new blowstill will use a slightly larger vessel compared to the existing blowstill, there will be no change in actual asphalt throughput, asphalt blow loss or asphalt production rate. Therefore, there will be no change to the actual or potential emissions or the character of emissions as a result of the proposed replacement project. In addition, there will be no change to the method of emission control.

Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement	
39.403	Is Public Notice Required?	**No**
	If no, give reason:	**There are no increases in allowable emissions that exceed significant or de minimis public notice thresholds, no new contaminants, and no change in character of emissions.**

Construction Permit & Amendment Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.111(a)(2)(G)	Is the facility expected to perform as represented in the application?	**Yes**
116.111(a)(2)(A)(i)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act?	**Yes**
116.111(a)(2)(B)	Emissions will be measured using the following method:	**Recordkeeping**
	Comments on emission verification:	**Records are required to indicate proper operation of control equipment, throughputs, and production rates.**
116.111(a)(2)(D)	Subject to NSPS?	**Yes**
	Subparts **A, Dc, & UU**	
116.111(a)(2)(E)	Subject to NESHAP?	**No, the site does not emit any air contaminants regulated under 40 CFR Part 61.**
116.111(a)(2)(F)	Subject to NESHAP (MACT) for source categories?	**Yes**
	Subparts **A & AAAAAAA**	
116.111(a)(2)(H)	**Nonattainment review applicability: This site does not emit 100 tons or more per year of NOx or VOC. Therefore, nonattainment review is not applicable.**	
116.111(a)(2)(I)	**PSD review applicability: The facility is not a named source nor does it have the potential to emit greater than 250 tons per year of any pollutant. Therefore, PSD review is not applicable.**	

Rule Citation	Requirement		
116.111(a)(2)(L)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities?		**No**
	If yes, did the proposed facility, group of facilities, or account obtain allowances to operate:		**No**
116.140 - 141	Permit Fee: **$5683.00**	Fee certification:	**M817366**

Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement
122.10(13)	**Title V applicability: Yes, this facility operates under O-2771.**
122.602	**Periodic Monitoring (PM) applicability:** The company is required to monitor temperature of the incinerator with an averaging period of one hour, and to monitor visible emissions once per week of blowing stills, of storage tanks, and of mineral handling and storage facilities.
122.604	**Compliance Assurance Monitoring (CAM) applicability:** CAM applies to both the Thermal Oxidizer (direct-flame incinerator) (EPN 8/8A) and the Coalescing Filter Mist Elimination Systems (EPN CFL/34). CAM is achieved through following NESHAP (MACT) AAAAAAA requirements. Temperature monitoring for the Thermal Oxidizer as required by the MACT is required by Special Condition 28 at a 1 hour interval as opposed to the 3 hours interval specified in AAAAAAA. The Coalescing Filter Mist Elimination System is required to follow the operating range as specified in 40 Code of Federal Regulations (40 CFR) § 63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device is required to fall within the approved operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3).

Process/Project 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 accepts the thermal oxidizer exhaust gas for preheating recovery and fires as necessary to meet the steam needs of the plant.

Pollution Prevention, Sources, Controls and BACT- [30 TAC 116.111(a)(2)(C)]

Emissions at the facility are produced by two heaters, the boiler and the standby boiler, all storage and process tanks, blowing stills, and all truck and railcar loading and unloading operations.

The Standby Boiler (EPN BLR5) is rated at 19 Million British Thermal units/hour (MMBtu/hr) and is equipped with a low NOx burner (with a manufacturer represented 30 parts per million rating).

Emissions from the blowing stills, loading racks, and storage tanks vent to a thermal oxidizer (direct-flame incinerator). The thermal incinerator has a rated destruction efficiency of 95% for PM/PM10, H2S, CO, and VOC.

Emissions from stabilizer storage, stabilizer heaters, the line 1 stabilizer use bin, and sand application are vented to baghouses. Emissions from the line 1 surfacing section are vented to dust collectors. These control units have a rated capture efficiency of at least 99%.

No abatement device or method was listed for capture and reduction of SO2 from the listed facilities at the site. The controls are economically reasonable and technically practicable considering the age of the facility and the impact of its emissions on the surrounding area.

Emissions from planned startup and shutdown activities are authorized by this permit from an amendment approved in June 2013. Maintenance activities are authorized either under Permit by Rule or claimed under 30 Texas Administrative Code § 116.119, De Minimis Facilities or Sources. Startup and shutdown emissions are virtually indistinguishable from production emissions. Although there may be minor emissions associated with startup and shutdown, emission factors used to quantify production emissions are considered to have enough conservatism to include any incidental increases that may be attributed to startup and shutdown. In addition, emissions from planned startup and shutdown of combustion units should not result in any quantifiable hourly emissions change for products of combustion. Although there may be transitional and incidental spikes before units stabilize during startups (5 to 15 minutes), overall products of combustion are expected to be within hourly range limits for normal loads during production operations.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	**Yes**
Company representative(s):	**Ms. Latha Kambham, Trinity Consultants**
Contacted Via:	**e-mail**
Date of contact:	**March 27, 2018**

Project Reviewer Steven Stump	4-11-2018 Date	Team Leader Joel Stanford for Bonnie Evridge	04/16/18 Date

Texas Commission on Environmental Quality
Form PI-1 General Application for
Air Preconstruction Permit and Amendment
Page 1

Important Note: The agency requires that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued and no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to www.tceq.texas.gov/permitting/central_registry/guidance.html.

I. Applicant Information		
A. Company or Other Legal Name: Building Materials Investment Corporation		
Texas Secretary of State Charter/Registration Number (if applicable):		
B. Company Official Contact Information: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____		
Name: Bruce Dahlgren		
Title: Plant Manager		
Mailing Address: 2600 Singleton Blvd		
City: Dallas	State: TX	ZIP Code: 75212
Telephone No.: 214-637-8970	Fax No.: 214-637-5202	
E-mail Address: bruce.dahlgren@gaf.com		
All permit correspondence will be sent via regular mail unless electronic copies are specifically requested. The company official must initial here if electronic correspondence is requested. BD		
C. Technical Contact Name Information: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____		
Name: Kevin Bush		
Title: Sr. Environmental Engineer		
Company Name: Building Materials Investment Corporation		
Mailing Address: 2600 Singleton Blvd		
City: Dallas	State: TX	ZIP Code: 75212
Telephone No.: 972-872-2325	Fax No.: 214-637-5202	
E-mail Address: kevin.bush@gaf.com		
D. Site Name: Dallas Plant		
E. Area Name/Type of Facility: Asphalt Shingle and Coating Materials Manufacturing	☒ Permanent ☐ Portable	
For portable units, please provide the serial number of the equipment being authorized below.		
Serial No:	Serial No:	
F. Principal Company Product or Business: Asphalt Shingle and Coating Materials		
Principal Standard Industrial Classification Code (SIC): 2951/2952		
Principal North American Industry Classification System (NAICS): 324122		
G. Projected Start of Construction Date: May 2018		
Projected Start of Operation Date: May 2018		

282350

Texas Commission on Environmental Quality
Form PI-1 General Application for
Air Preconstruction Permit and Amendment
Page 2

I. Applicant Information (continued)		
H. Facility and Site Location Information (If no street address, provide clear driving directions to the site in writing.):		
Street Address: 2600 Singleton Blvd		
City/Town: Dallas	County: Dallas	ZIP Code: 75212
Latitude (nearest second): 32°46'40"	Longitude (nearest second): 96°51'48"	
I. Account Identification Number (leave blank if new site or facility): DB-0378-S		
J. Core Data Form		
Is the Core Data Form (Form 10400) attached? If No, provide customer reference number and regulated entity number (complete K and L).		☐ YES ☒ NO
K. Customer Reference Number (CN): CN605251487		
L. Regulated Entity Number (RN): RN100788959		
II. General Information		
A. Is confidential information submitted with this application? If Yes, mark each confidential page confidential in large red letters at the bottom of each page.		☐ YES ☒ NO
B. Is this application in response to an investigation, notice of violation, or enforcement action? If Yes, attach a copy of any correspondence from the agency and provide the RN in section I.L. above.		☐ YES ☒ NO
C. Number of New Jobs: 0		
D. Provide the name of the State Senator and State Representative and district numbers for this facility site:		
State Senator: Kelly Hancock	District No.: 9	
State Representative: Eric Johnson	District No.: 100	
III. Type of Permit Action Requested		
A. Mark the appropriate box indicating what type of action is requested.		
☐ Initial	☒ Amendment	☐ Revision (30 TAC § 116.116(e)
☐ Change of Location		☐ Relocation
B. Permit Number (if existing):7711A		
C. Permit Type: Mark the appropriate box indicating what type of permit is requested. *(check all that apply, skip for change of location)*		
☒ Construction	☐ Flexible	☐ Multiple Plant ☐ Nonattainment ☐ Plant-Wide Applicability Limit
☐ Prevention of Significant Deterioration (PSD)		☐ Hazardous Air Pollutant Major Source
☐ PSD for greenhouse gases (GHGs)		☐ Other:_____

III. Type of Permit Action Requested *(continued)*		
D. Is a permit renewal application being submitted in conjunction with this amendment in accordance with 30 TAC § 116.315(c).		☐ YES ☒ NO
E. Is this application for a change of location of previously permitted facilities?		☐ YES ☒ NO
If Yes, complete all parts of III.E.		
Current Location of Facility (If no street address, provide clear driving directions to the site in writing.):		
Street Address:		
City:	County:	ZIP Code:
Proposed Location of Facility (If no street address, provide clear driving directions to the site in writing.):		
Street Address:		
City:	County:	ZIP Code:
Will the proposed facility, site, and plot plan meet all current technical requirements of the permit special conditions? If "NO," attach detailed information.		☐ YES ☐ NO
Is the site where the facility is moving considered a major source of criteria pollutants or HAPs?		☐ YES ☐ NO
F. Consolidation into this Permit: List any standard permits, exemptions or permits by rule to be consolidated into this permit including those for planned maintenance, startup, and shutdown.		
List:		
G. Are you permitting planned maintenance, startup, and shutdown emissions?		☐ YES ☒ NO
If Yes, attach information on any changes to emissions under this application as specified in VII and VIII.		
H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability)		
Is this facility located at a site required to obtain a federal operating permit?		☒ YES ☐ NO ☐ To be determined
If Yes, list all associated permit number(s), attach pages as needed).		
Associated Permit No (s.): O-2771		
Identify the requirements of 30 TAC Chapter 122 that will be triggered if this application is approved.		
☐ FOP Significant Revision	☒ FOP Minor	☐ Application for an FOP Revision
☐ Operational Flexibility/Off-Permit Notification		☐ Streamlined Revision for GOP
☐ To be Determined		☐ None

III. Type of Permit Action Requested *(continued)*	
H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) *(continued)*	
Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site. ***(check all that apply)***	
☐ GOP Issued ☐ GOP application/revision application submitted or under APD review	
☒ SOP Issued ☒ SOP application/revision application submitted or under APD review	
IV. Public Notice Applicability	
A. Is this a new permit application or a change of location application?	☐ YES ☒ NO
B. Is this application for a concrete batch plant? If Yes, complete all parts of V.D.	☐ YES ☒ NO
C. Is this an application for a major modification of a PSD, nonattainment, FCAA § 112(g) permit, or exceedance of a PAL permit?	☐ YES ☒ NO
D. If this is an application for emissions of GHGs, select one of the following:	
☐ separate public notice (requires a separate application) ☐ consolidated public notice	
E. Is this application for a PSD or major modification of a PSD located within 100 kilometers or less of an affected state or Class I Area?	☐ YES ☒ NO
If Yes, list the affected state(s) and/or Class I Area(s).	
List:	
F. Is this a state permit amendment application? If Yes, complete all parts of IV.F.	
Is there any change in character of emissions in this application?	☐ YES ☒ NO
Is there a new air contaminant in this application?	☐ YES ☒ NO
Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)?	☐ YES ☒ NO
List the total annual emission increases associated with the application ***(List all that apply and attach additional sheets as needed):***	
Volatile Organic Compounds (VOC):0	
Sulfur Dioxide (SO_2):0	
Carbon Monoxide (CO):0	
Nitrogen Oxides (NO_x):0	
Particulate Matter (PM):0	
PM 10 microns or less (PM_{10}):0	
PM 2.5 microns or less ($PM_{2.5}$):0	
Lead (Pb):0	
Hazardous Air Pollutants (HAPs):0	
Other speciated air contaminants not listed above: N/A	

V. Public Notice Information *(complete if applicable)*		
A. Responsible Person: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____		
Name:		
Title:		
Company Name:		
Mailing Address:		
City:	State:	ZIP Code:
Telephone No.:	Fax No.:	
E-mail Address:		
B. Technical Contact: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) ___		
Name:		
Title:		
Mailing Address:		
City:	State:	ZIP Code:
Telephone No.:	Fax No.:	
E-mail Address:		
C. Name of the Public Place:		
Physical Address *(No P.O. Boxes)*:		
City:	County:	ZIP Code:
The public place has granted authorization to place the application for public viewing and copying.		☐ YES ☐ NO
The public place has internet access available for the public.		☐ YES ☐ NO
D. Concrete Batch Plants, PSD, and Nonattainment Permits		
County Judge Information (For Concrete Batch Plants and PSD and/or Nonattainment Permits) for this facility site.		
The Honorable:		
Mailing Address:		
City:	State:	ZIP Code:

V. Public Notice Information *(complete if applicable)*			
D. Concrete Batch Plants, PSD, and Nonattainment Permits *(continued)*			
Is the facility located in a municipality or an extraterritorial jurisdiction of a municipality? ***(For Concrete Batch Plants)***			☐ YES ☐ NO
Presiding Officers Name(s):			
Title:			
Mailing Address:			
City:	State:	ZIP Code:	
Provide the name, mailing address of the chief executive for the location where the facility is or will be located.			
Chief Executive:			
Mailing Address:			
City:	State:	ZIP Code:	
Provide the name, mailing address of the Indian Governing Body for the location where the facility is or will be located.			
Indian Governing Body:			
Mailing Address:			
City:	State:	ZIP Code:	
Identify the Federal Land Manager(s) for the location where the facility is or will be located.			
Federal Land Manager(s):			
E. Bilingual Notice			
Is a bilingual program required by the Texas Education Code in the School District?			☐ YES ☐ NO
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?			☐ YES ☐ NO
If Yes, list which languages are required by the bilingual program?			
VI. Small Business Classification *(Required)*			
A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than $6 million in annual gross receipts?			☐ YES ☒ NO
B. Is the site a major stationary source for federal air quality permitting?			☒ YES ☐ NO
C. Are the site emissions of any regulated air pollutant greater than or equal to 50 tpy?			☒ YES ☐ NO
D. Are the site emissions of all regulated air pollutants combined less than 75 tpy?			☐ YES ☒ NO

VII. Technical Information		
A. The following information must be submitted with your Form PI-1 ***(this is just a checklist to make sure you have included everything)***		
☐ Current Area Map ☐ Plot Plan ☐ Existing Authorizations ☐ Process Flow Diagram ☐ Process Description ☐ Maximum Emissions Data and Calculations ☐ Air Permit Application Tables ☐ Table 1(a) (Form 10153) entitled, Emission Point Summary ☐ Table 2 (Form 10155) entitled, Material Balance ☐ Other equipment, process or control device tables		
B. Are any schools located within 3,000 feet of this facility?		☒ YES ☐ NO
C. Maximum Operating Schedule:		
Hour(s): 24 hours/day	Day(s): 7 days/week	
Week(s): 52 weeks/year	Year(s):	
Seasonal Operation? If Yes, please describe in the space provide below.		☐ YES ☒ NO
Hour(s):	Day(s):	
Week(s):	Year(s):	
D. Have the planned MSS emissions been previously submitted as part of an emissions inventory?		☒ YES ☐ NO
Provide a list of each planned MSS facility or related activity and indicate which years the MSS activities have been included in the emissions inventories. Attach pages as needed.		
MSS Facility(s) or Activity	**Year(s)**	
Site-wide MSS Activities	2013 to present	
E. Does this application involve any air contaminants for which a disaster review is required?		☐ YES ☒ NO
If Yes, list which air contaminants require a disaster review.		

VII.	**Technical Information *(continued)***	
F.	Does this application include a pollutant of concern on the Air Pollutant Watch List (APWL)?	☐ YES ☒ NO
G.	Are emissions of GHGs associated with this project subject to PSD?	☐ YES ☒ NO
If "yes," provide a list of all associated applications for this project:		
VIII.	**State Regulatory Requirements** **Applicants must demonstrate compliance with all applicable state regulations to obtain a permit or amendment.** *The application must contain detailed attachments addressing applicability or non-applicability; identify state regulations; show how requirements are met; and include compliance demonstrations.*	
A.	Will the emissions from the proposed facility protect public health and welfare, and comply with all rules and regulations of the TCEQ?	☒ YES ☐ NO
B.	Will emissions of significant air contaminants from the facility be measured?	☒ YES ☐ NO
C.	Is the Best Available Control Technology (BACT) demonstration attached?	☒ YES ☐ NO
D.	Will the proposed facilities achieve the performance represented in the permit application as demonstrated through recordkeeping, monitoring, stack testing, or other applicable methods?	☒ YES ☐ NO
IX.	**Federal Regulatory Requirements** **Applicants must demonstrate compliance with all applicable federal regulations to obtain a permit or amendment.** *The application must contain detailed attachments addressing applicability or non-applicability; identify federal regulation subparts; show how requirements are met; and include compliance demonstrations.*	
A.	Does Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to a facility in this application?	☒ YES ☐ NO
B.	Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to a facility in this application?	☐ YES ☒ NO
C.	Does 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to a facility in this application?	☒ YES ☐ NO
D.	Do nonattainment permitting requirements apply to this application?	☐ YES ☒ NO
E.	Do prevention of significant deterioration permitting requirements apply to this application?	☐ YES ☒ NO
F.	Do Hazardous Air Pollutant Major Source [FCAA § 112(g)] requirements apply to this application?	☐ YES ☒ NO
G.	Is a Plant-wide Applicability Limit permit being requested?	☐ YES ☒ NO
X.	**Professional Engineer (P.E.) Seal**	
Is the estimated capital cost of the project greater than $2 million dollars?		☐ YES ☒ NO
If Yes, submit the application under the seal of a Texas licensed P.E.		

XI. Permit Fee Information	
Check, Money Order, Transaction Number, ePay Voucher Number: 637612	
Fee Amount: $5,683.00	
Paid online?	☐ YES ☒ NO
Company name on check: Trinity Consultants, Inc.	
Is a Table 30 (Form 10196) entitled, Estimated Capital Cost and Fee Verification, attached?	☒ YES ☐ NO ☐ N/A
XII. Delinquent Fees and Penalties	
This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/fees/delin.	
XIII. Signature	
The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA) the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.	
Name: Bruce Dahlgren	
Signature: *Original Signature Required*	
Date: 2/26/2018	

agw

12700 Park Central Drive | Suite 2100 | Dallas, TX 75251 | P (972) 661-8100 | F (972) 385-9203
trinityconsultants.com

Trinity Consultants

February 26, 2018

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
12100 Park 35 Circle, MC 161
Building C, Third Floor, Room 300W
Austin, TX 78753

JB
FEB 27 2018
APIRT

AIR PERMITS DIVISION
FEB 27 2018
RECEIVED

Re: New Source Review (NSR) Permit Amendment – Blowstill T26 Replacement Project
NSR Permit No. 7711A
Building Materials Investment Corporation – Dallas Plant – Dallas, TX, Dallas County
Customer Reference Number (CN) 605251487
Regulated Entity Reference Number (RN) 100788959

Dear APIRT:

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). Operations at GAF Dallas Plant are authorized under New Source Review (NSR) Permit No. 7711A, Standard Permit No. 91414 and several Permits by Rule (PBRs). The Dallas Plant is a Title V facility operating under Site Operating Permit (SOP) No. O-2771.

BACKGROUND

On February 8, 2018, GAF submitted a permit alteration letter for the proposed Blowstill T26 replacement project (TCEQ Project No. 281345). Based on communications with the TCEQ, the proposed project is required to be authorized via NSR permit amendment, since it is considered as construction of a new emissions source.[1] Therefore, GAF is submitting this NSR permit amendment letter to request the authorization of the proposed Blowstill T26 replacement project.

PROPOSED PROJECT

The blowstills at the Dallas Plant are used to blow air through heated asphalt flux to achieve desired asphalt properties for asphalt coating process. The emissions from the air blowing process from the blowstills are routed to the thermal oxidizer. The hot exhaust gases from the thermal oxidizer are either vented to atmosphere from the thermal oxidizer exhaust stack (EPN 8) or are ducted to a waste heat boiler (EPN 8A) to produce steam for the facility. One of the existing blowstills (Facility Identification Number [FIN]: T26) is currently near the end of its life and replacement of this blowstill is required to maintain the current process performance and productions. With this submittal, GAF proposes to replace the blowstill T26 with a new blowstill. The new blowstill functions in similar manner as the existing blowstill. Although the new blowstill will use a slightly larger vessel compared to the existing blowstill, there will be no change in the actual asphalt throughput, asphalt blow loss or asphalt production rate. Therefore, there will be no change to the actual or potential emissions or the character of emissions as result of the proposed replacement project. In addition, there will be no change to

[1] Call between Mr. Joel Stanford (TCEQ) and Ms. Lele Bao (Trinity Consultants) on February 21, 2018.

the method of emission control. The emissions from the blowstill will continue to be controlled by the thermal oxidizer. Thus, the applicable state and federal requirements and the demonstration of compliance with the Best Available Control Technology (BACT) remain unchanged and are not included in this submittal.

The proposed project does not result in an increase in off-property concentration of air contaminants since the actual and allowable emissions, character of emissions or stack parameters of control equipment will remain unchanged. Therefore, impact analysis is not required for this project.

This NSR permit amendment letter is submitted in accordance with Title 30 Texas Administrative Code (TAC) Chapter 116. The TCEQ Form PI-1 is included in Attachment 1 of this letter.

Pursuant to 30 TAC §116.141, the permit fee for a construction permit amendment application is based on the capital cost of the proposed project. The permit fee is determined as 0.3% of the capital cost of the proposed project with a minimum fee of $900 and a maximum fee of $75,000. The Table 30 is included in Attachment 2 of this letter. GAF has submitted the permit amendment fee check to the TCEQ Revenue Section under separate cover. A copy of the check is included in Attachment 2 for reference purposes only.

If you have any questions regarding this submittal, please feel free to contact me at (972) 661-8100 or via email at lkambham@trinityconsultants.com, or Mr. Kevin Bush, GAF, at (214) 637-8933.

Sincerely,

TRINITY CONSULTANTS

K. Kalyra Gattu

Latha Kambham, Ph.D.
Managing Consultant

Attachments

cc: Ms. Elizabeth Smith, Air Section Manager, TCEQ Region 4
Ms. Joni Keach, Section Manager, City of Dallas Air Pollution Control Program
Mr. Kevin Bush, GAF
Ms. Lele Bao, Trinity Consultants

Current

Special Conditions

Permit Number 7711A

Emission Limitations

1. This permit authorizes those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit.

Fuel Specifications

2. Fuel for the facilities shall be pipeline-quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).

3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis.

Federal Applicability

4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60, specifically the following:

   A. Subpart A - General Provisions;

   B. Subpart Dc – Small Industrial-Commercial- Institutional Steam Generating Units; and

   C. Subpart UU – Asphalt Processing and Asphalt Roof Manufacture.

5. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, specifically the following:

   A. Subpart A - General Provisions; and

   B. Subpart AAAAAAA - Area Sources: Asphalt Processing and Asphalt Roof Manufacturing.

Opacity/Visible Emission Limitations

6. Opacity of particulate matter emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), the Electrostatic Precipitator (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, and building vents shall not exceed 5 percent, averaged over a six-minute period.

7. Opacity of particulate matter emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed 0 percent, averaged over a six-minute period, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of

particulate matter emissions from any blowing still shall not exceed 0 percent, averaged over a six-minute period.

8. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent, averaged over a six minute period.

9. No visible fugitive emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas shall leave the property.

Operational Limitations, Work Practices, and Plant Design

10. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer (direct-flame incinerator).

11. Fabric filter baghouses, properly installed and in good working order, shall control particulate matter emissions from the Stabilizer Storages, Stabilizer Heaters, the Line 1 Stabilizer and Heater, the Line 1 Stabilizer Use Bin, and Sand Application when this equipment is in operation.

12. Dust collectors, properly installed and in good working order, shall control particulate matter emissions from the Line 1 Surfacing Section when this equipment is in operation.

13. The thermal oxidizer (direct-flame incinerator) shall be operated at an average incineration temperature of 1450°F measured immediately downstream of the incinerator, based on a one-hour averaging period, during normal operations. Normal operations are herein defined as any time period when asphalt blowing is occurring, and emissions from the blowing are vented to the direct-flame incinerator. The direct-flame incinerator shall be operated at a minimum incineration temperature of 1300°F during Standby Operating Conditions to assure compliance with the maximum allowable emission rates table (MAERT) limits for volatile organic compounds (VOC) from EPN 8/8A. Standby operating conditions are herein defined as when no process blowers are in operation on any blowing still venting to the direct-flame incinerator.

    The permit holder is allowed to conduct stack sampling of the thermal oxidizer (direct-flame incinerator) during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the thermal oxidizer (direct-flame incinerator) during Normal Operations.

14. The maximum allowable asphalt throughput rates are 32,063 pounds per hour for Line 1 and 53,438 pounds per hour for Line 3.

15. The maximum allowable production rates for both Line 1 and Line 3, combined, are 171 tons per hour and 1,498,000 tons per year of finished shingles.

16. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.

17. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations.

Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.

18. All stacks associated with the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. All stacks associated with the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level.

19. There shall be no changes in representations unless the permit is altered or amended.

20. The following facilities are authorized by separate Standard Permit:

Table 1: Standard Permit References

EPN/ Source Name	Registration No.
NST-1/Baghouse 1 (Filler Transfer Operations)- L3	91414
NST-1/Baghouse 2 (Filler Transfer Operations)- L3	91414

Demonstration of Continuous Compliance

21. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ *Sampling Procedures Manual* and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling.

22. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions.

23. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for Coalescing Filter Mist Systems Stack (EPN CFL/34), the Electrostatic Precipitator Stack (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, and building vents. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall:

    A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Record Keeping Requirements; or

    B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Record Keeping Requirements.

24. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the visible emissions limitation specified in this permit. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), 5) at least 15 feet, but not more than 0.25 mile, from the plume, and 6) in accordance with EPA 40 CFR Part 60, Appendix A, Test Method 22, except where stated otherwise in this condition. If visible emissions exceed 30 cumulative seconds in any six-minute period, the owner or operator shall take immediate action (as appropriate) to eliminate the excessive visible emissions. The corrective action shall be documented within 24 business hours of completion.

25. For any asphalt storage tank, storage silo, or mineral handling facility, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the corresponding opacity limit, the permit holder shall report a deviation.

26. For any blowing still, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.

Compliance Assurance Monitoring

27. The temperature in the combustion chamber or immediately downstream of the combustion chamber of the thermal oxidizer (direct-flame incinerator) shall be measured and recorded four times per hour with an averaging period of one hour. The permit holder shall establish a minimum combustion temperature using the most recent performance test, manufacturer's

recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.

28. The 3-hour average inlet gas temperature for the Coalescing Filter Mist Elimination Systems (Line 1 and Line 3 Asphalt Coaters) with ESP as Backup (EPN CFL/34) shall be maintained within the operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device shall be maintained within the approved operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3).

Sampling Requirements

29. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be incorporated into the design of the stack(s) according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.

30. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.

31. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:

    A. Date for pretest meeting;

    B. Date sampling will occur;

    C. Points or sources to be sampled;

    D. Name of firm conducting sampling;

    E. Type of sampling equipment to be used; and

    F. Method or procedure to be used in sampling.

    The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

32. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO_2, NO_x, and VOC.

33. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling.

34. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Air, Air Permits Division in Austin.

35. The sampling report shall include the following:

    A. Plant production and throughput rates during tests; and

    B. Thermal oxidizer (direct-flame incinerator) operating temperature during tests.

36. Copies of the final sampling report shall be forwarded to the TCEQ within 30 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

    One copy to the TCEQ Regional Office with jurisdiction.

    One copy to the TCEQ Office of Air, Air Permits Division in Austin.

    One copy to each appropriate local air pollution control program with jurisdiction.

Recordkeeping Requirements

37. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following:

    A. Records of the exhaust gas temperature immediately downstream of the thermal oxidizer (direct-flame incinerator) to demonstrate compliance with 30 TAC § 115.126(1)(A)(i);

    B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4);

    C. Hourly asphalt throughput rates for Line 1 and for Line 3;

    D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;

    E. Records of asphalt stored and used, that have the potential to emit Hazardous Air Pollutants (HAPs), kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months;

    F. All malfunctions, repairs, and maintenance of abatement systems, which includes bag replacement and the manufacturer's suggested cleaning and maintenance schedule;

    G. Quarterly observations for visible emissions and/or opacity determinations;

    H. Records of road cleaning, application of road dust control, or road maintenance for dust control; and

    I. All monitoring data and support information as specified in 30 TAC § 122.144.

Dated: November 25, 2014

Current

Emission Sources - Maximum Allowable Emission Rates

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
Stillyard Operation				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM	0.01	0.02
		PM_{10}	0.01	0.02
		$PM_{2.5}$	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR4	T-2 Laminating Adhesive Bulk Storage Tank heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM	0.01	0.02
		PM_{10}	0.01	0.02
		$PM_{2.5}$	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage and Coating Feed Loop Vent	NO_x	0.10	0.44
		SO_2	0.01	0.01
		PM	0.01	0.03
		PM_{10}	0.01	0.03
		$PM_{2.5}$	0.01	0.03
		CO	0.08	0.35
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO_x	0.82	3.59
		SO_2	0.01	0.04

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		PM	0.16	0.70
		PM_{10}	0.16	0.70
		$PM_{2.5}$	0.16	0.70
		CO	1.73	7.58
		VOC	0.11	0.48
8/8A	Thermal Oxidizer (Direct Flame Incinerator) Exhaust through Waste Heat Boiler Stack	NO_x	1.90	8.31
		SO_2	29.35	128.55
		PM	2.62	11.46
		PM_{10}	2.62	11.46
		$PM_{2.5}$	2.62	11.46
		CO	11.34	49.65
		VOC	0.09	0.37
WHBLR1	Waste Heat Recovery Boiler Natural Gas Burner Side Vent	NO_x	0.47	2.06
		SO_2	0.01	0.04
		PM	0.11	0.48
		PM_{10}	0.11	0.48
		$PM_{2.5}$	0.11	0.48
		CO	1.24	5.43
		VOC	0.08	0.35
Common to Line 1 and Line 3				
CFL/34	Coalescing Filter Mist Elimination Systems (Line 1 and Line 3 Asphalt Coaters) with ESP as Backup (Stack)	PM	0.63	2.76
		PM_{10}	0.63	2.76
		$PM_{2.5}$	0.63	2.76
		VOC	5.76	25.23
Line 1 Operation				
1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM	0.23	1.01
		PM_{10}	0.23	1.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
		$PM_{2.5}$	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM	0.03	0.13
		PM_{10}	0.03	0.13
		$PM_{2.5}$	0.03	0.13
1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM	0.59	2.58
		PM_{10}	0.59	2.58
		$PM_{2.5}$	0.59	2.58
1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM	0.59	2.58
		PM_{10}	0.59	2.58
		$PM_{2.5}$	0.59	2.58
1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	PM	0.59	2.58
		PM_{10}	0.59	2.58
		$PM_{2.5}$	0.59	2.58
COOL1	Line 1 Cooling Section (3 stacks)	PM	8.52	37.30
		PM_{10}	8.52	37.30
		$PM_{2.5}$	8.52	37.30
		VOC	1.65	7.23
Line 3 Operation				
25	Sand Application Baghouse Stack	PM	0.59	2.58
		PM_{10}	0.59	2.58
		$PM_{2.5}$	0.59	2.58
26A	Stabilizer Storage Baghouse A Stack	PM	0.15	0.66
		PM_{10}	0.15	0.66
		$PM_{2.5}$	0.15	0.66
26B	Stabilizer Storage Baghouse B Stack	PM	0.29	1.27
		PM_{10}	0.29	1.27
		$PM_{2.5}$	0.29	1.27

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
27	Stabilizer Heater Baghouse Stack	PM	0.09	0.39
		PM_{10}	0.09	0.39
		$PM_{2.5}$	0.09	0.39
28	Asphalt Heater Vent	NO_x	0.59	2.58
		SO_2	<0.01	0.02
		PM	0.04	0.20
		PM_{10}	0.04	0.20
		$PM_{2.5}$	0.04	0.20
		CO	0.49	2.15
		VOC	0.03	0.14
FUG1	Plant-wide Fugitive Emissions	PM	0.91	3.97
		PM_{10}	0.91	3.97
		$PM_{2.5}$	0.91	3.97
		VOC	0.43	1.88
COOL3	Line 3 Cooling Section (3 stacks)	PM	6.74	29.52
		PM_{10}	6.74	29.52
		$PM_{2.5}$	6.74	29.52
		VOC	2.76	12.09
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO_x	0.39	1.71
		SO_2	0.01	0.01
		PM	0.03	0.13
		PM_{10}	0.03	0.13
		$PM_{2.5}$	0.03	0.13
		CO	0.33	1.45
		VOC	0.02	0.09
All Source (site-	Various	Single HAP	--	<10

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
wide)		Aggregate HAP	--	<25

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) Exempt Solvent - Those carbon compounds or mixtures of carbon compounds used as solvents which have been excluded from the definition of volatile organic compound.
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
HRVOC - highly reactive volatile organic compounds as defined in 30 TAC § 115.10
IOC-U - inorganic compounds (unspeciated)
NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10} - total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented
$PM_{2.5}$ - particulate matter equal to or less than 2.5 microns in diameter
CO - carbon monoxide
HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: April 10, 2018

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Stephanie Bergeron Perdue, *Interim Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 20, 2018

MR BRUCE DAHLGREN
PLANT MANAGER
BUILDING MATERIALS INVESTMENT CORPORATION
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Amendment
Permit Number: 7711A
Expiration Date: November 25, 2024
Building Materials Investment Corporation
Asphalt Roofing Materials Manufacturing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN605251487

Dear Mr. Dahlgren:

This is in response to your letter received February 27, 2018 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 7711A. We understand that you propose to replace an existing blowstill with a similar unit. Also, this will acknowledge that your application for the above-referenced amendment is technically complete as of March 27, 2018.

In accordance with Title 30 Texas Administrative Code (TAC) §116.116(b) and §116.160 and based on our review, Permit Number 7711A is hereby amended. This information will be incorporated into the existing permit file. Enclosed are revised general conditions (permit face). You are reminded that these facilities must be in compliance with all rules and regulations of the Texas Commission on Environmental Quality (TCEQ) and of the U.S. Environmental Protection Agency at all times.

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC §116.120(a):

1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.

2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.

3. Failure to complete the changes authorized by this amendment within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC §116.120(b).

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC §50.139, an action by the executive

director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 7 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code §382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the **effective date of the approval**. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

You are reminded that these facilities must be in compliance with all rules and regulations of the Texas Commission on Environmental Quality (TCEQ) and of the U.S. Environmental Protection Agency at all times.

If you need further information or have any questions, please contact Mr. Steven Stump at (512) 239-6107 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

Enclosure

cc: Ms. Latha Kambham, Managing Consultant, Trinity Consultants, Dallas
Manager, Air Pollution Control Program, City of Dallas Office of Environmental Quality, Dallas
Air Section Manager, Region 4 - Dallas/Fort Worth

Project Number: 282350

Texas Commission on Environmental Quality
Air Quality Permit

A Permit Is Hereby Issued To
Building Materials Investment Corporation
Authorizing the Construction and Operation of
Asphalt Roofing Materials Manufacturing Facility
Located at **Dallas, Dallas County, Texas**
Latitude 32° 46' 40" Longitude -96° 51' 48"

Permit: 7711A

Amendment Date: April 20, 2018

Expiration Date: November 25, 2024

For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)] [1]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of $5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and

operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates**. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)] [1]
9. **Maintenance of Emission Control**. The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC§ 116.115(b)(2)(G)]
10. **Compliance with Rules**. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit. [1]

[1] Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Steven Stump

From: Joel Stanford
Sent: Friday, April 20, 2018 12:11 PM
To: Latha Kambham; Steven Stump
Cc: Lele Bao
Subject: RE: 7711A - C4 - BUILDING MATERIALS INVESTMENT CORPORATION - 282350

No problem! Let us know if you have any questions or can be of further assistance.

Joel Stanford
Work Leader - Mechanical Team
Air Permits Division
Texas Commission on Environmental Quality
Mail Code: MC-163, PO Box 13087
Austin, Texas 78711-3087
Direct Line: (512) 239-0270
How are we doing? www.tceq.texas.gov/customersurvey

From: Latha Kambham [mailto:LKambham@trinityconsultants.com]
Sent: Friday, April 20, 2018 11:58 AM
To: Steven Stump; Joel Stanford
Cc: Lele Bao
Subject: FW: 7711A - C4 - BUILDING MATERIALS INVESTMENT CORPORATION - 282350

Hi Steven and Joel,

We wanted to say thank you for your guidance and quick approval of this project. We really appreciate you understanding the importance of this project for the plant.

Thanks and have a great weekend!
Latha

Latha Kambham, Ph.D.
Managing Consultant

Trinity Consultants
12700 Park Central, Suite 2100 | Dallas, Texas 75251
Office: (972) 661-8100; Cell: (504) 343-4593 | Fax: (972) 385-9203

Email: lkambham@trinityconsultants.com
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Trinity Consultants

---------- Forwarded message ----------
From: **ElecRsp** <ElecRsp@tceq.texas.gov>
Date: Fri, Apr 20, 2018 at 10:41 AM
Subject: 7711A - C4 - BUILDING MATERIALS INVESTMENT CORPORATION - 282350
To:
Cc: "KEVIN.BUSH@GAF.COM" <KEVIN.BUSH@gaf.com>, Steven Stump <Steven.Stump@tceq.texas.gov>, "brian.cunningham@dallascityhall.com" <brian.cunningham@dallascityhall.com>

Please see attached documents.

Texas Commission on Environmental Quality
Air Permits Division
(512) 239-1250

Steven Stump

From: Latha Kambham <LKambham@trinityconsultants.com>
Sent: Tuesday, April 10, 2018 11:55 AM
To: Steven Stump
Cc: Lele Bao
Subject: RE: 7711A - C5 - BUILDING MATERIALS INVESTMENT CORPORATION - 281361

Hi Steven,

Thanks for sending the permits!! We look forward to hearing from you soon on the blowstill replacement.

Thanks,
Latha

Latha Kambham, Ph.D.
Managing Consultant

Trinity Consultants
12700 Park Central, Suite 2100 | Dallas, Texas 75251
Office: (972) 661-8100; Cell: (504) 343-4593 | Fax: (972) 385-9203

Email: lkambham@trinityconsultants.com
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From: Steven Stump [mailto:Steven.Stump@Tceq.Texas.Gov]
Sent: Tuesday, April 10, 2018 11:39 AM
To: Latha Kambham <LKambham@trinityconsultants.com>
Subject: FW: 7711A - C5 - BUILDING MATERIALS INVESTMENT CORPORATION - 281361

Hello,

Attached are copies of the baghouse replacement/relocation permit that was mailed out today, I will begin putting the together the folder for the blowstill replacement today.

From: ElecRsp
Sent: Tuesday, April 10, 2018 9:58 AM
Cc: KEVIN.BUSH@GAF.COM; Steven Stump; brian.cunningham@dallascityhall.com
Subject: 7711A - C5 - BUILDING MATERIALS INVESTMENT CORPORATION - 281361

Please see attached documents.

Texas Commission on Environmental Quality
Air Permits Division
(512) 239-1250

Steven Stump

From: Latha Kambham <LKambham@trinityconsultants.com>
Sent: Wednesday, April 04, 2018 11:22 AM
To: Steven Stump
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Thank you, Steven!

I appreciate the details on status and timeline and maybe we can request the management review to be expedited once the blowstill project goes in for approval.

Thanks,
Latha

Latha Kambham, Ph.D.
Managing Consultant

Trinity Consultants
12700 Park Central, Suite 2100 | Dallas, Texas 75251
Office: (972) 661-8100; Cell: (504) 343-4593 | Fax: (972) 385-9203

Email: lkambham@trinityconsultants.com
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From: Steven Stump [mailto:Steven.Stump@Tceq.Texas.Gov]
Sent: Wednesday, April 04, 2018 11:15 AM
To: Latha Kambham <LKambham@trinityconsultants.com>
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Hi Latha,

The draft permit is out of my hands working its way through the management approval process, I would estimate approval either this Friday or Monday of next week.
And for the blowstill permit, because no new permit documents are being produced I will be submitting that for approval as soon as I get notification that the draft permit has been approved. I would estimate conservatively for the blowstill permit final approval by April 20 at the latest.

Steven Stump, Engineering Specialist
Office of Air | Air Permits Division | NSR
Texas Commission on Environmental Quality
steven.stump@tceq.texas.gov
Work Phone: (512) 239-6107

From: Latha Kambham [mailto:LKambham@trinityconsultants.com]
Sent: Wednesday, April 04, 2018 10:57 AM
To: Steven Stump
Cc: Lele Bao
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Hi Steven,

I wanted to check in to see if you have any update on the status of draft permit. Since this affects the blowstill permit, we and the client are getting little concerned about the timeline and I would appreciate your assistance in this matter.

Thanks,
Latha

Latha Kambham, Ph.D.
Managing Consultant

Trinity Consultants
12700 Park Central, Suite 2100 | Dallas, Texas 75251
Office: (972) 661-8100; Cell: (504) 343-4593 | Fax: (972) 385-9203

Email: lkambham@trinityconsultants.com
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From: Latha Kambham
Sent: Wednesday, March 28, 2018 11:51 AM
To: 'Steven Stump' <Steven.Stump@Tceq.Texas.Gov>
Cc: Lele Bao <lbao@trinityconsultants.com>
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Hi Steven,

The draft table looks good and we have 2 minor suggestions (formatting) in the attached document. If these can be incorporated prior to submittal for management approval, that would be great!!

Thanks,
Latha

Latha Kambham, Ph.D.
Managing Consultant

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From: Steven Stump [mailto:Steven.Stump@Tceq.Texas.Gov]
Sent: Tuesday, March 27, 2018 2:53 PM
To: Latha Kambham <LKambham@trinityconsultants.com>
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Hi Latha,

I have attached a copy of the draft MAERT for your review and approval, I am currently putting together the folder for the Baghouse Replacement project and will be submitting it for approval upon your approval of the MAERT.

For the Blowstill Replacement Project, I will need to wait until the Baghouse Alteration Project in approved before I can submit this project for approval but because the MAERT and Special Conditions are not changing this will be very quick

Best,

Steven Stump, Engineering Specialist
Office of Air | Air Permits Division | NSR
Texas Commission on Environmental Quality
steven.stump@tceq.texas.gov
Work Phone: (512) 239-6107

THE STATE OF TEXAS
TCEQ

From: Latha Kambham [mailto:LKambham@trinityconsultants.com]
Sent: Tuesday, March 20, 2018 11:57 AM
To: Steven Stump
Cc: Lele Bao
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Hi Steven,

Hope you are doing well. We wanted to check on the status of the draft MAERT for this project and also the NSR amendment project for Blowstill replacement.

http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=airpermits.project_report&proj_id=282350&addn_num_txt=7711A

Thanks,
Latha

Latha Kambham, Ph.D.
Managing Consultant

Trinity Consultants
12700 Park Central, Suite 2100 | Dallas, Texas 75251
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Email: lkambham@trinityconsultants.com
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From: Latha Kambham
Sent: Tuesday, March 13, 2018 1:48 PM
To: 'Steven Stump' <Steven.Stump@Tceq.Texas.Gov>
Cc: Lele Bao <lbao@trinityconsultants.com>
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Thank you, Steven! It was Monday yesterday. So, we understand and appreciate looking into further and agreeing with our assessment.

We will review the draft permit documents once we receive them and let you know of any comments or changes.

Thanks,
Latha

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Email: lkambham@trinityconsultants.com
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From: Steven Stump [mailto:Steven.Stump@Tceq.Texas.Gov]
Sent: Tuesday, March 13, 2018 1:28 PM
To: Latha Kambham <LKambham@trinityconsultants.com>
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Hi Latha,

I was very busy yesterday so I appreciate your patience on this. You are correct, My colleague and I were looking at the wrong data point of the impacts review and assumed the impacts were greater. So you don't need to conduct any additional modeling for this project.

Also, I should have the draft MAERT to you later this afternoon for you to review.

Thanks,

Steven Stump, Engineering Specialist
Office of Air | Air Permits Division | NSR
Texas Commission on Environmental Quality
steven.stump@tceq.texas.gov
Work Phone: (512) 239-6107

From: Latha Kambham [mailto:LKambham@trinityconsultants.com]
Sent: Monday, March 12, 2018 2:46 PM
To: Steven Stump
Cc: Lele Bao
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Hi Steven,

I called a couple of times today to discuss this and as I mentioned in the voice mail this morning, the project results in a decrease in emissions as well as impacts. So, can you please let us know why a site-wide modeling is required for the project?

Thanks,
Latha

Latha Kambham, Ph.D.
Managing Consultant

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Email: lkambham@trinityconsultants.com
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From: Steven Stump [mailto:Steven.Stump@Tceq.Texas.Gov]
Sent: Monday, March 12, 2018 8:48 AM
To: Latha Kambham <LKambham@trinityconsultants.com>
Subject: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation

Good Morning,

I am the permit reviewer for the subject air permit alteration application. After reviewing the application it has been determined that site-wide modeling for PM10 and PM2.5 is required.

Please provide the requested site-wide modeling by Wednesday, April 11, 2018

If you have any questions or comments regarding this issue feel free to contact me via phone or email.

Best,

Steven Stump, Engineering Specialist
Office of Air | Air Permits Division | NSR
Texas Commission on Environmental Quality
steven.stump@tceq.texas.gov
Work Phone: (512) 239-6107

Steven Stump

From: Latha Kambham <LKambham@trinityconsultants.com>
Sent: Wednesday, March 28, 2018 11:51 AM
To: Steven Stump
Cc: Lele Bao
Subject: RE: Air Permit #7711A Alteration Application for Baghouse Replacement and Relocation
Attachments: 281361 - Draft Maert_Comments.docx

Hi Steven,

The draft table looks good and we have 2 minor suggestions (formatting) in the attached document. If these can be incorporated prior to submittal for management approval, that would be great!!

Thanks,
Latha

Latha Kambham, Ph.D.
Managing Consultant

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Email: lkambham@trinityconsultants.com
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steven.stump@tceq.texas.gov
Work Phone: (512) 239-6107

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Best,

Steven Stump, Engineering Specialist
Office of Air | Air Permits Division | NSR
Texas Commission on Environmental Quality
steven.stump@tceq.texas.gov
Work Phone: (512) 239-6107

Return to Sharenet

03/05/2018 ----------NSR IMS - PROJECT RECORD ----------

PROJECT#: 282350 PERMIT#: 7711A STATUS: PENDING DISP CODE: _____
RECEIVED: 02/27/2018 PROJTYPE: AMEND AUTHTYPE: CONSTRUCT ISSUED DT: _____
RENEWAL: 11/25/2024
PROJECT ADMIN NAME: ASPHALT ROOFING MATERIALS MANUFACTURING FACILITY
PROJECT TECH NAME: ASPHALT ROOFING MATERIALS MANUFACTURING FACILITY

Assigned Team: MECHANICAL TEAM

STAFF ASSIGNED TO PROJECT:

BANIGO , JANA	- REVIEWR1_2 -	AP INITIAL REVIEW
TEAM LEADER , MECHANICAL	- REVIEW ENG -	MECHANICAL TEAM

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)
ISSUED TO: BUILDING MATERIALS INVESTMENT CORPORATION
COMPANY NAME: Building Materials Investment Corporation
CUSTOMER REFERENCE NUMBER: **CN605251487**

REGULATED ENTITY/SITE INFORMATION
REGULATED ENTITY NUMBER: **RN100788959** ACCOUNT: DB0378S
PERMIT NAME: GAF MATERIALS

REGULATED ENTITY LOCATION: 2600 SINGLETON BLVD
REGION 04 - DFW METROPLEX NEAR CITY: DALLAS COUNTY: DALLAS

CONTACT DATA

CONTACT NAME: MR BRUCE DAHLGREN CONTACT ROLE: RESPONSIBLE OFFICIAL
JOB TITLE: PLANT MANAGER ORGANIZATION: BUILDING MATERIALS INVESTMENT CORPORATION
MAILING ADDRESS: 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738
PHONE: (214) 637-8970 Ext: 0
FAX: (214) 637-5202 Ext: 0
EMAIL:BRUCE.DAHLGREN@GAF.COM

CONTACT NAME: MR KEVIN BUSH CONTACT ROLE: TECHNICAL CONTACT
JOB TITLE: SR ENVIRONMENTAL ENGINEER ORGANIZATION: BUILDING MATERIALS INVESTMENT CORPORATION
MAILING ADDRESS: 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738
PHONE: (972) 872-2325 Ext: 0
FAX: (214) 637-5202 Ext: 0
EMAIL:KEVIN.BUSH@GAF.COM

PROJECT NOTES:

03/02/2018 SOS/DFC; NOT ON APWL; PAYMENT CLEARED ON 3/1/2018; LEG LTR DOC#598740
03/02/2018 ELECTRONIC CORRESPONDENCE REQUESTED BY APPLICANT

PERMIT NOTES:

12/09/2009 INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL
06/15/2017 AS REFERENCED IN 30 TAC § 116.116(D)(2), ALL CHANGES AUTHORIZED UNDER PBR 147140 TO A PERMITTED FACILITY SHALL BE INCORPORATED INTO THE NSR PERMIT NO. 7711A WHEN IT IS AMENDED OR RENEWED.

FEE:

Reference	Fee Receipt Number	Amount	Fee Receipt Date	Fee Payment Type
637612	M817366	5683.00	03/01/2018	CHECK

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
ADMIN DEFICIENCY CYCLE	02/27/2018	03/02/2018
APIRT RECEIVED PROJECT (DATE)	02/27/2018	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	03/02/2018	
ENHANCED ADMINISTRATIVE OR APPLICATIONS REVIEW (EAR)	03/02/2018	03/02/2018
LEGISLATORS NOTIFIED OF APPLICATION RECEIVED (DATE)	03/02/2018	
SITE REVIEW RFC SENT TO REGION (DATE)	03/02/2018	
CENTRAL REGISTRY UPDATED		
COMPLIANCE HISTORY REVIEW COMPLETED (DATE)		
DEFICIENCY CYCLE		
DRAFT PERMIT RFC SENT TO REGION (DATE)		
EMISSIONS MODELING CYCLE DONE BY APPLICANT		
EMISSIONS MODELING CYCLE DONE BY TCEQ		
FINAL PACKAGE REWORK CYCLE		
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)		
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)		
MODELING AUDIT CYCLE		
PROJECT RECEIVED BY ENGINEER (DATE)		
PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)		
TOXICOLOGY RFC CYCLE		
WORKING DRAFT PERMIT REVIEW CYCLE		
WPO FINAL PACKAGE CYCLE		

Permit Unit Type:

Who Represents Me?
Districts By Address

U.S. Senators|U.S. Representatives|State Senators|State Representatives|SBOE

* indicates address is located near a district boundary. The county voter registration office maintains official precinct information, including the districts for each precinct; contact your local voter registrar for verification.

2600 Singleton Blvd
Dallas, TX
75212-3738
Dallas

Texas U.S. Senators

U.S. Senators represent the entire state. Texas' current U.S. Senators are Senator John Cornyn and Senator Ted Cruz. See their websites for current contact information.

Texas U.S. Representatives*

Congressional District 33--Congressman
Marc Veasey
Texas Congressional Member Websites

Texas State Senator

Texas State Senate District 23--Senator
Royce West
Capitol Office: CAP 1E.3
Capitol Phone: (512) 463-0123
Capitol Address: P.O. Box 12068, Capitol Station
Austin, TX 78711
District Address: 5787 S. Hampton Rd., Suite 385
Dallas TX 75232
Phone: (214) 467-0123
State District Offices

Texas State Representative

Select District Type: No District Shading

Texas State House District 100--
Representative Eric Johnson
Capitol Office: CAP 1N.7
Capitol Phone: (512) 463-0586
Capitol Address: P.O. Box 2910
Austin, TX 78768
District Address: 8035 East RL Thornton Frwy, Suite 326
Dallas TX 75228

Phone: (214) 565-5663

Texas State Board of Education Member

Texas State SBOE District 13--Ms. Erika Beltran
State Board of Education Member
Websites

Jana Banigo

From:	eNotice TCEQ
Sent:	Friday, March 02, 2018 3:26 PM
To:	Royce.west@senate.texas.gov; eric.johnson@house.texas.gov
Subject:	TCEQ Notice - Permit Number 7711A
Attachments:	TCEQ Notice - 7711A_282350.pdf

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html.

Questions regarding this email may be submitted either by replying directly to this email or by calling Ms. Betsy Peticolas with the Air Permits Division at 512-239-6033.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (http://get.adobe.com/reader) to download the free Adobe Acrobat Reader software.

ATTACHMENT 2. TABLE 30 AND COPY OF CHECK

Texas Commission on Environmental Quality
Table 30
Estimated Capital Cost and Fee Verification

Include estimated cost of the equipment and services that would normally be capitalized according to standard and generally accepted corporate financing and accounting procedures. Tables, checklists, and guidance documents pertaining to air quality permits are available from the Texas Commission on Environmental Quality, Air Permits Division Web site at **www.tceq.texas.gov/nav/permits/air_permits.html**.		
I.	**Direct Costs [30 TAC § 116.141(c)(1)]**	**Estimated Capital Cost**
A.	A process and control equipment not previously owned by the applicant and not currently authorized under this chapter.	$
B.	Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements.	$
C.	Freight charges	$
D.	Site preparation, including demolition, construction of fences, outdoor lighting, road, and parking areas.	$
E.	Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment.	$
F.	Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures.	$
G.	Ambient air monitoring network.	$
II.	**Indirect Costs [30 TAC § 116.141(c)(2)]**	**Estimated Capital Cost**
A.	Final engineering design and supervision, and administrative overhead.	$
B.	Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up.	$
C.	Contractor's fee and overhead.	$
	Total Estimated Capital Cost	$ 1,894,300

Texas Commission on Environmental Quality
Table 30
Estimated Capital Cost and Fee Verification

I certify that the total estimated capital cost of the project as defined in 30 TAC § 116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines Criminal Offenses for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Company Name: Building Materials Investment Corporation

Company Representative Name *(please print)*: Bruce Dahlgren

Title: Plant Manager

Company Representative Signature: B Dahlgren

Estimated Capital Cost		Permit Application Fee	GHG*/PSD/Nonattainment Application Fee
Less than	$300,000	$900 (minimum fee)	$3,000 (minimum fee)
$300,000 to	$25,000,000	0.30% of capital cost	
$300,000 to	$7,500,000	$ 5,683.00	1.0% of capital cost
Greater than	$25,000,000	$75,000 (maximum fee)	
Greater than	$7,500,000		$75,000 (maximum fee)

*A single PSD fee (calculated on the capital cost of the project per 30 TAC § 116.163) will be required for all of the associated permitting actions for a GHG PSD project. Other NSR permit fees related to the project that have already been remitted to the TCEQ can be subtracted when determining the appropriate fee to submit with the GHG PSD application; please identify these other fees in the GHG PSD permit application.

Permit Application Fee (from table above) = $ 5,683.00 | Date: 2/26/2018

ATTACHMENT 1. TCEQ PI-1 FORM