CITY OF DALLAS

December 3, 2021

[redacted]

Re: Complaint Investigation
GAF MATERIALS
2600 Singleton Boulevard
Dallas, TX 75212
TCEQ ID #: RN100788959 CN605251487

Dear [redacted]

The City of Dallas Air Compliance Program has completed a final investigation in response to your concern regarding the (allegation) at the above-referenced facility. Enclosed is a copy of the investigation report.

For more information about complaint process, you may access the publication GI-278: *Do You Want to Make an Environmental Complaint? Do You Have Information or Evidence?* On our website at www.tceq.texas.gov.

We appreciate your concern in bringing this matter to our attention. If we can be further assistance, please contact Ms. Adrianne Johnson at 214-671-5239.

Sincerely,

Joseph Vu MS, P.G., Manager
Air Compliance Program
Office of Environmental Quality and Sustainability

Enclosure: Investigation Report

AIR CP_100788959_CP_20211108_Investigation_1774604_

Texas Commission on Environmental Quality
Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

Customer: Building Materials Investment Corporation
Customer Number: CN605251487

Regulated Entity Name: GAF MATERIALS
Regulated Entity Number: RN100788959

Investigation # 1774604

Investigator: ADRIANNE JOHNSON

Conducted: 11/08/2021 -- 11/18/2021

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

Investigation Type: Compliance Investigation

Additional ID(s): 7711A
147140
2771
91414

Incident Numbers
369802

Site Classification

SIC Code: 2951
SIC Code: 2952
NAIC Code: 324122

Location: 2600 Singleton Blvd

Address: ,
, ,

Local Unit: CITY OF DALLAS LOCAL PROGRAM
Activity Type(s): AIRCOMPL - AIR CMPL - AIR COMPLAINT INV

Principal(s):

Role	Name
RESPONDENT	BUILDING MATERIALS INVESTMENT CORPORATION

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	PLANT MANAGER	MR WAYNE SCOTT	[redacted] Phone (214) 637-8964
REGULATED ENTITY MAIL CONTACT	SR ENVIRONMENTAL ENGINEER	MR KEVIN BUSH	[redacted] Phone (972) 872-2325

Other Staff Member(s):

Role	Name
QA Reviewer	JOSEPH VU
Supervisor	JOSEPH VU

Associated Check List

Checklist Name	Unit Name
AIR COMPLAINT INVESTIGATION	GAF Materials

Investigation Comments:

INTRODUCTION
On 11/08/2021,11/10/2021, 11/15/2021, and 11/18/2021 Ms. Adrianne Johnson, environmental investigator with the City of Dallas Local Air Program (LAP), conducted an air complaint investigation (Air-CMPL) at the general area of 2800 block of Bedford St Blvd Dallas, Tx 75212.

On 11/08/2021 and 11/09/2021, the investigator contacted the complaint to gather additional information. [redacted] The odor smells like asphalt coming from GAF Materials.

The following information is a description of the complaint received.

COMPLAINANT NAME/ADDRESS
This information is being handled as confidential and is included in the confidential file. Refer to Incident Number #369802 for more information.

TIME, DATE, FREQUENCY, AND DURATION OF THE ODOR
The complainant alleged nuisance odor conditions on 11/05/2021. When asked, the complainant did not give any information about the times, frequencies, and duration of the odors.

DESCRIBE ACTIVITY/OPERATIONS OCCURRING AT TIME OF THE COMPLAINTS
[redacted]

DESCRIPTION OF THE ALLEGED EFFECTS
The complainant did not give any information of alleged effects.

INVESTIGATION INFORMATION
METEOROLOGICAL DATA OBTAINED AT THE TIME OF THE INVESTIGATIONS
11/08/2021 – 73 F, north winds 12 mph, 56% relative humidity, and sunny. (Attachment 1)
11/10/2021 – 73 F, north winds 14 mph, 67% relative humidity, and cloudy. (Attachment 2)
11/15/2021 – 80 F, south winds 7 mph, 42% relative humidity, and sunny. (Attachment 3)
11/18/2021 at 13:00 hours – 60 F, northwest winds 14 mph, 19 % relative humidity, and sunny.
11/18/2021 at 13:27 hours – 61 F, north winds 18 mph, 18 % relative humidity, and sunny
(Attachment 4)

Odor Survey Maps for the dates visited are attached.
LOCATION AND DURATION OF THE ODORS:
11/08/2021- odors were detected by the investigator in front of Fish Trap Lake, upwind from the GAF Materials. These odors were detected in increments of 30 seconds or less over a period of 15 minutes intermittently. After 15 minutes, odors were no longer detected.
11/10/2021- no odors were detected by the investigator during the investigation.
11/15/2021- no odors were detected by the investigator during the investigation.
11/18/2021- odors were detected by investigator on Manila Rd between the two sets of railroad tracks downwinds from GAF Materials.

DESCRIPTION OF THE ODOR
11/08/2021- strong odors of asphalt
11/18/2021- light odors of asphalt

DESCRIPTION OF THE EFFECTS ON THE INVESTIGATOR
11/08/2021- odors were detected but no health effects were experienced by the investigator.
11/10/2021- no odors were detected by the investigator during the investigation.
11/15/2021- no odors were detected by the investigator during the investigation.
11/18/2021- odors were detected but no health effects were experienced by the investigator.

SOURCE EMISSIONS CONSISTENT WITH THE ALLEGED ODOR
The odors detected on 11/08/2021 and 11/18/2021 were consistent with the complainant's description of odors.

DESCRIBE ACTIVITY/OPERATIONS OCCURRING AT TIME OF INVESTIGATION
During the time of investigations, GAF Materials was in operation.

DESCRIPTION OF THE LAND USE IN THE AREA SURROUNDING
The northern land use is a residential area and shopping center along major roadway Singleton Blvd. Southern land use is industrial businesses along W Commerce St.

DESCRIPTION OF THE TERRAIN FEATURES OF THE AREA
The terrain is flat with a lake, industrial businesses, residential area, and railroad nearby.

LOCATION OF THE SOURCE OF THE ODOR
The source of the odor is allegedly coming from GAF Materials but no source has been confirmed.

SPECIFIC CAUSE OF THE ODOR
No specific cause of odor has been confirmed.

COMPLAINANT LOG NECESSARY/APPROPRIATE
Yes, odor logs were sent via email to the complainant on 11/08/2021. No odor logs have been returned to the investigator by the complainant to date.

Daily Narrative
On 11/05/2021, the complainant alleged strong burning smell from the alleged location 2800 Bedford St Dallas, Tx 75212.

On 11/08/2021, Ms. Adrianne Johnson, environmental investigator, contacted the complainant via email at 08:51 hours and called at 08:59 hours and left a voicemail. The investigator arrived at the intersection of 2800 Bedford St and 2800 Manila Rd at 14:44 hours. The weather conditions: 73 F, 56% humidity,12 mph north and sunny. The investigator did surveillance on foot alongside the fence on Manila Rd toward the intersection of Manila Rd and Akron Street. No burning odors were observed.

At 15:05 hours, the investigator drove to the corner of Manila Rd and Singleton Blvd and detected a strong odor of asphalt. The investigator then relocated and continued surveillance near Fish Trap Lake. The strong odor was consistent for 25 seconds and would disappear for 30 seconds to a minute for a duration of 5 to 6 minutes. The detected odors do not currently meet the requirements for a Notice of Violation for nuisance odor conditions. The investigator left at 15:25 hours.

On 11/09/2021, the complainant emailed the investigator stating, [redacted] The odor smells like asphalt coming from GAF. Mr. Kevin Bush, Senior Environmental Engineer and Mr. Wayne Scott, Plant Manager was notified via email about the complaint at the facility.

On 11/10/2021, the investigator arrived at 13:03 hours at the 2800 block of Bedford Street Dallas, TX 75212. Weather conditions: 73F, 67% humidity,14 mph north winds, and cloudy. Surveillance was conducted on foot on Manila Rd and Bedford Street (downwinds), no odors were observed. Started driving to Fish Trap Lake at 13:18 hours and arrived at 13:20 hours. While in front of Fish Trap Lake (upwinds) on Toronto Rd, no odors were observed. No violations were given and the investigator left at 13:36 hours.

On 11/12/2021, Mr. Wayne Scott responded to the notification of the complaint. He stated "The plant was in stable operation and our emission control devices were operating normally. We received a single asphalt railcar delivered from the Union Pacific Railroad around 1 pm. It is routine for us to receive one or more asphalt railcars each day."

On 11/15/2021, the investigator arrived at alleged location at 14:23 hours. Weather conditions:80 F,42 % humidity,7 mph south winds and sunny. The investigator walked south on Manila Rd towards the railroad track to an empty lot to observe the upwinds. The investigator was there from 14:32-14:47 hours and no odors were observed. The investigator drove to Fish Trap Lake for downwind observations, arrived at 14:52 hours and was there until 15:07 hours. No odors were observed. No violations were given, and the investigator left at 15:08 hours.

On 11/17/2021, Mr. Wayne Scott responded to the investigator about how the rail cars are unloaded and the

operating hours of the facility. He stated, "Our facility is a 24-hour, 7-day a week operation. Railcars are sealed and cold as delivered. We attach steam lines to the jacket of the railcar and heat them, while still sealed, until warm enough to be able to be pumped. Unload hoses are attached to the rail car and a pump transfers the material from the railcar to a storage tank. While that transfer is going on the top hatch on the railcar is cracked open to allow air to draw into the railcar and not pull a vacuum and collapse it. This would pull air into the railcar rather than venting anything out. The asphalt transfers into a storage tank which is vented to the thermal oxidizer which controls any fumes in the air displaced from the storage tank."

On 11/18/2021, the investigator arrived at 13:00 hours at an empty area on Manila Rd, between two sets of railroad tracks near the alleged location (2800 Bedford St and 2800 Manila Rd). Downwinds observation occurred from 13:05 -13:23 hours. A slight odor of asphalt occurred approximately 10 seconds and this happened 3 times within a 5-minute period. The investigator drove to Fish Trap Lake to observe upwinds and arrived at 13:27 hours. Upwinds observation occurred from 13:31-13:46 hours. The weather conditions changed to 61 F, 18 % humidity, 13 mph north winds and sunny. Upwinds observations the investigator walked on the sidewalk along Singleton Blvd on the side near Fish Trap Lake. No odors were observed, and the investigation drove to the alleged location. Observations started from 13:51-14:06 hours and no odors were observed. Since the detected odors do not meet the requirements of a violation in accordance with the odor assessment procedures, no violations were given and the investigator left at 14:07 hours.

Exit Interview
On 11/18/2021, Mr. Scott was informed via email no violations were found.

GENERAL FACILITY AND PROCESS INFORMATION
Process Description
GAF Materials manufactures roofing shingles. GAF has been at its present location for over 20 years, but a roofing facility has been at this site since the 1940's. The facility has approximately 200 employees. The plant operates three shifts per day, 24 hours per day 7 days per week.
Line No. 1 makes conventional shingles. Line No. 3 makes laminate shingles. Large rolls/webs of fiberglass are fed into both shingle lines. Both surfaces of the fiberglass are coated with an asphalt and limestone mixture. The mixture is piped in from outdoor heated storage silos. After coating, a controlled layer of granules is dropped and embedded into the upper surface of the mat. The mat is flipped and a thin layer of sand is applied to the lower surface. The granules are received from hopper cars and bottom-loaded to silos via a bucket elevator. The granules are conveyed into the processing equipment. Fifteen silos contain granules and one is reserved for sand for Line #3. The silos are not equipped with dust collectors but the granules don't pose a particulate issue. Two outdoor bins hold non-colored, head lap (unexposed area of shingle) granules. Two roof-mounted, pulse air bag houses are located here; one unit for the 120 ton filler silo and the other for the filler use bin. Filler is a cheaper form of the limestone material. The filler is first off-loaded from a truck into a 120 ton, Hollow-Flayed filler silo. The material is transferred to a heater where it is heated to 300-400F°. The material is then transferred to a holding bin. The limestone and asphalt are mixed and moved by a paddle mixer and screw conveyor to the coating unit. Line No. 3 is similar in operation to Line No. 1, except for a few differences in equipment including that the granules are stored in nineteen silos and the sand in one.
Two 80 ton silos contain the filler material which is entered straight into the process.

The laminated shingles involve the following: The lamination occurs after the cooling is done with self-seal asphalt based dots, heat and pressure. A second layer is added to approximately half of the shingle to create a textured appearance. After coating, the web is water cooled and cut into sheets or shingles, stacked and packaged. Where the roll of dry un-woven fiberglass mat first feeds into the system, a negative air and dry filter system captures any loose fibers. Three dust collectors with approximately 144 bags each capture indoor plant emissions. The asphalt is received in bulk by truck or train. The material is initially received stored in two upright tanks, transferred into a holding tank, then conveyed into smaller tanks. All tanks or stills are jacketed and heated with steam coils to keep the asphalt hot. If cooling is necessary, blow still No. 13 is cooled internally, and blow still No. 26 is cooled externally with water. A total of nine tanks are used for storage. Other tanks are on-site but not in use, although functional. The facility has 2 boilers. Boiler No. 1 has a rating of 15mmBtu and Boiler No. 2 has a rating of 10 mmBtu. An electrostatic precipitator is the VOC and PM control device for Lines No. 1 and No. 3. A knockout tank takes emissions from the asphalt blowing stills and routes them to a thermal oxidizer, which is set at 1450° F and has a continuous monitoring system.

BACKGROUND
Compliance History

Regulated Entity: GAF Materials
Reference Number: RN100788959
Classification: High
Rating: 0.0

Customer Name: Building Materials Corporation of America
Customer Number: CN605251487
Classification: High
Rating: 0.0

Agreed Orders, Court Orders, and Other Compliance Agreements
There were no agreed orders, court orders, or other compliance agreements associated with the Facility within the past five years related to air quality.

Prior Enforcement Issues
One Notice of Violation (NOV) was issued to the Facility within the past five years related to air quality (see Attachment No. 5 Compliance History).

Complaints
On 11/05/2021, a complaint was received by City of Dallas (Incident 369802)
Investigation 1774604 no violations were issued during the investigation. Within the last two years a total of nine other complaints have been alleged against the facility (Incident #'s 297802, 340773, 350415,362605,362860,365503,365256,365647, and 368480) (Investigations 1746067,1756357,1765894). No violations were issued as a result of the previous complaint investigations.

Trend Analysis of Current and Past Complaints/Investigation Observations
An analysis of current and past complaints shows 10 complaints have been received within the past two years.Of the complaints related to closed investigations or the current investigation,1 out of 10 complaints alleged adverse health effects of eye and nose irritation. Most of the complainants alleged the odors are most frequent in the morning time.

The alleged character of the odors experienced included a burning smell, tar, asphalt smell, chemical smell, and burning rubber.Strong odors were experienced by investigator during an odor survey on Toronto Rd in front of Fish Trap Lake. The light odors were experienced by the investigator at an empty area on Manila Rd, between two sets of railroad tracks behind the GAF facility.

ADDITIONAL INFORMATION
Conclusions, Recommendations, and Current Enforcement Actions
No violations were issued, and a general compliance letter will be sent to the facility.

Additional Issues
None

Attachments
1) 11/08/2021 Odor Survey Map
2) 11/10/2021 Odor Survey Map
3) 11/15/2021 Odor Survey Map
4) 11/18/2021 Odor Survey Map
5) Compliance History Report

No Violations Associated to this Investigation

Signed Adrianne Johnson **Date** 11/29/2021
Environmental Investigator

Signed **Date** 11/29/21
Supervisor

Attachments: (in order of final report submittal)

____Enforcement Action Request (EAR)
_✓_Letter to Facility (specify type) : GCL
Investigation Report
____Sample Analysis Results
____Manifests
____Notice of Registration

_✓_Maps, Plans, Sketches
____Photographs
____Correspondence from the facility
____Other (specify) :

List of Attached files
11-08-2021 Odor Survey Map.docx
11-10-2021 Odor Survey Map.docx
11-15-2021 Odor Survey Map.docx
11-18-2021 Odor Survey Map.docx
Compliance History Report.pdf

Inv # 1774604

Attachment 1

11/08/2021 Odor Survey Map

Total Pages (1 total)

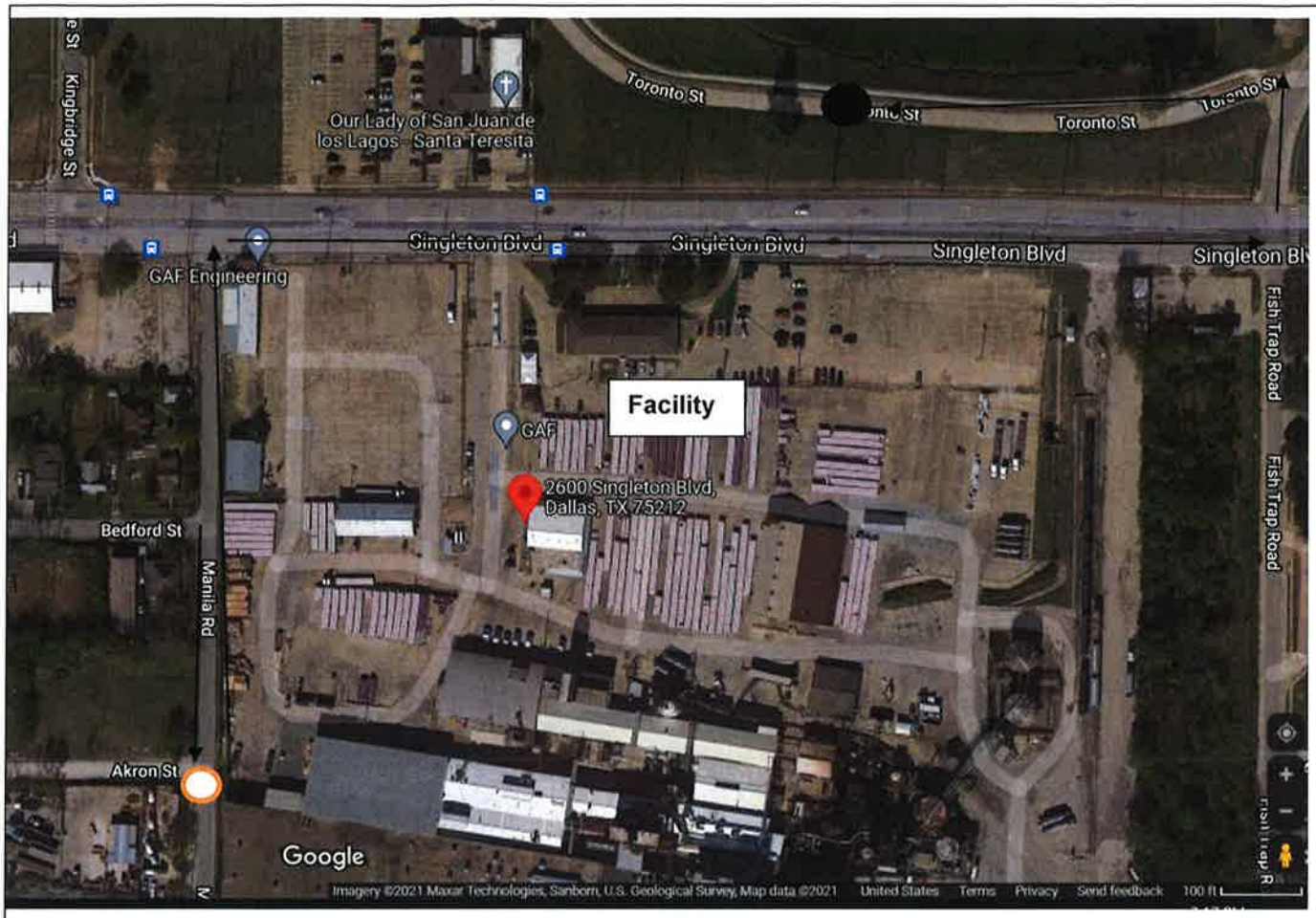
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

11/8/2021



Map/Figure Legend
Black arrow – Pathway
Black Circle – Upwind location
White circle – Downwind location

Weather conditions: 73 F, north winds 12 mph, 56% relative humidity, and sunny.
Odors observed in front of Fish Trap Lake, upwind location from the GAF Materials.

City of Dallas

Attachment 1 Map/Figure
City of Dallas Local Air Program
Investigation 1774604
2600 Singleton Blvd
Dallas, TX 75212
11/08/2021

Inv # 1774604

Attachment 2

11/10/2021 Odor Survey Map

Total Pages (1 total)

CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

11/8/2021

Map/Figure Legend
Black arrow – Pathway
Black Circle – Upwind location
White circle – Downwind location

Weather conditions: 73 F, north winds 14 mph, 67% relative humidity, and cloudy.
No odors were observed.

City of Dallas

Attachment 2 Map/Figure
City of Dallas Local Air Program
Investigation 1774604
2600 Singleton Blvd
Dallas, TX 75212
11/10/2021

Inv # 1774604

Attachment 3

11/15/2021 Odor Survey Map

Total Pages (1 total)

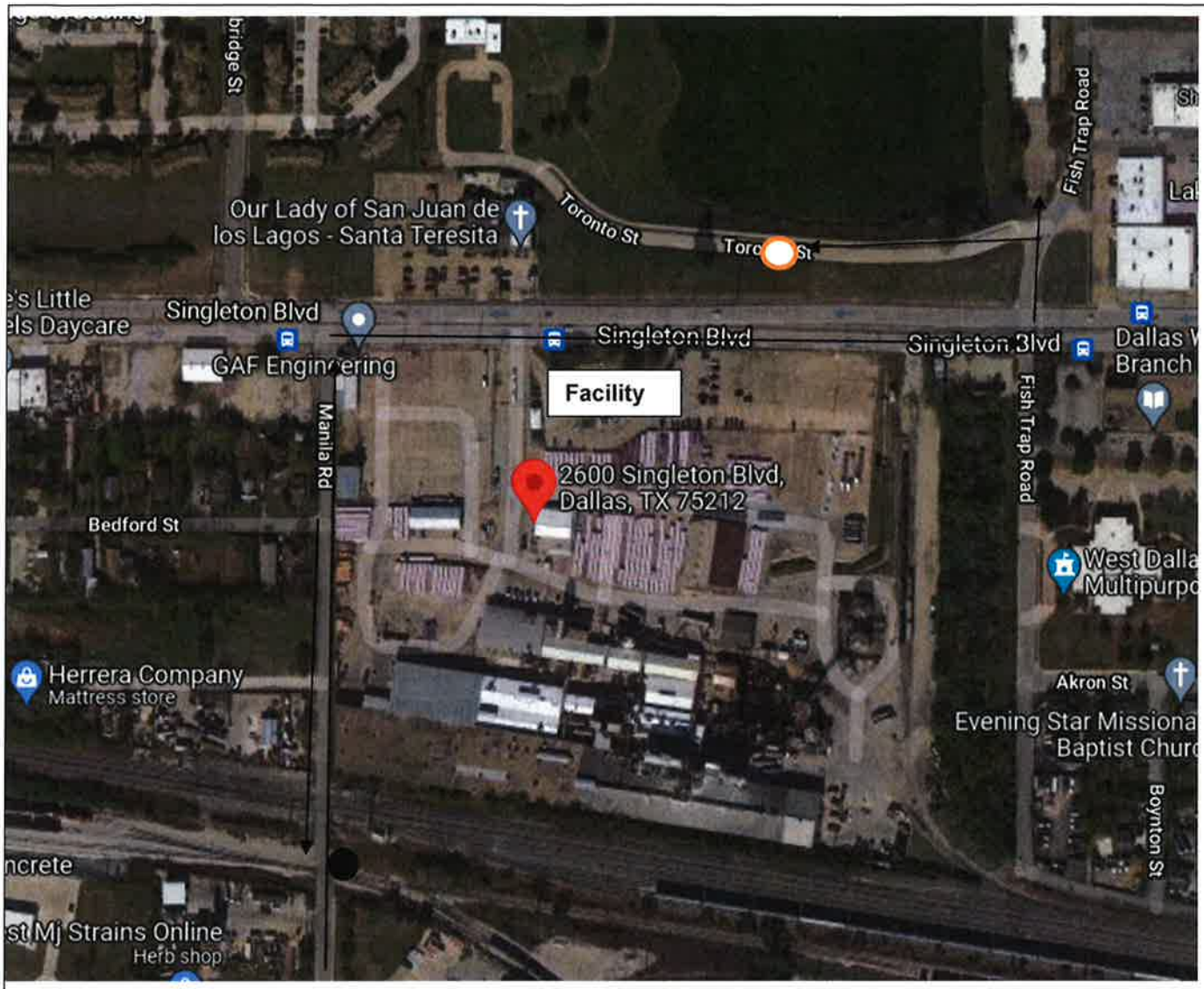
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

11/8/2021



Map/Figure Legend
Black arrow – Pathway
Black Circle – Upwind location
White circle – Downwind location

Weather conditions: 80 F, south winds 7 mph, 42% relative humidity, and sunny.
No odors were observed.

City of Dallas

Attachment 3 Map/Figure
City of Dallas Local Air Program
Investigation 1774604
2600 Singleton Blvd
Dallas, TX 75212
11/15/2021

Inv # 1774604

Attachment 4

11/18/2021 Odor Survey Map

Total Pages (1 total)

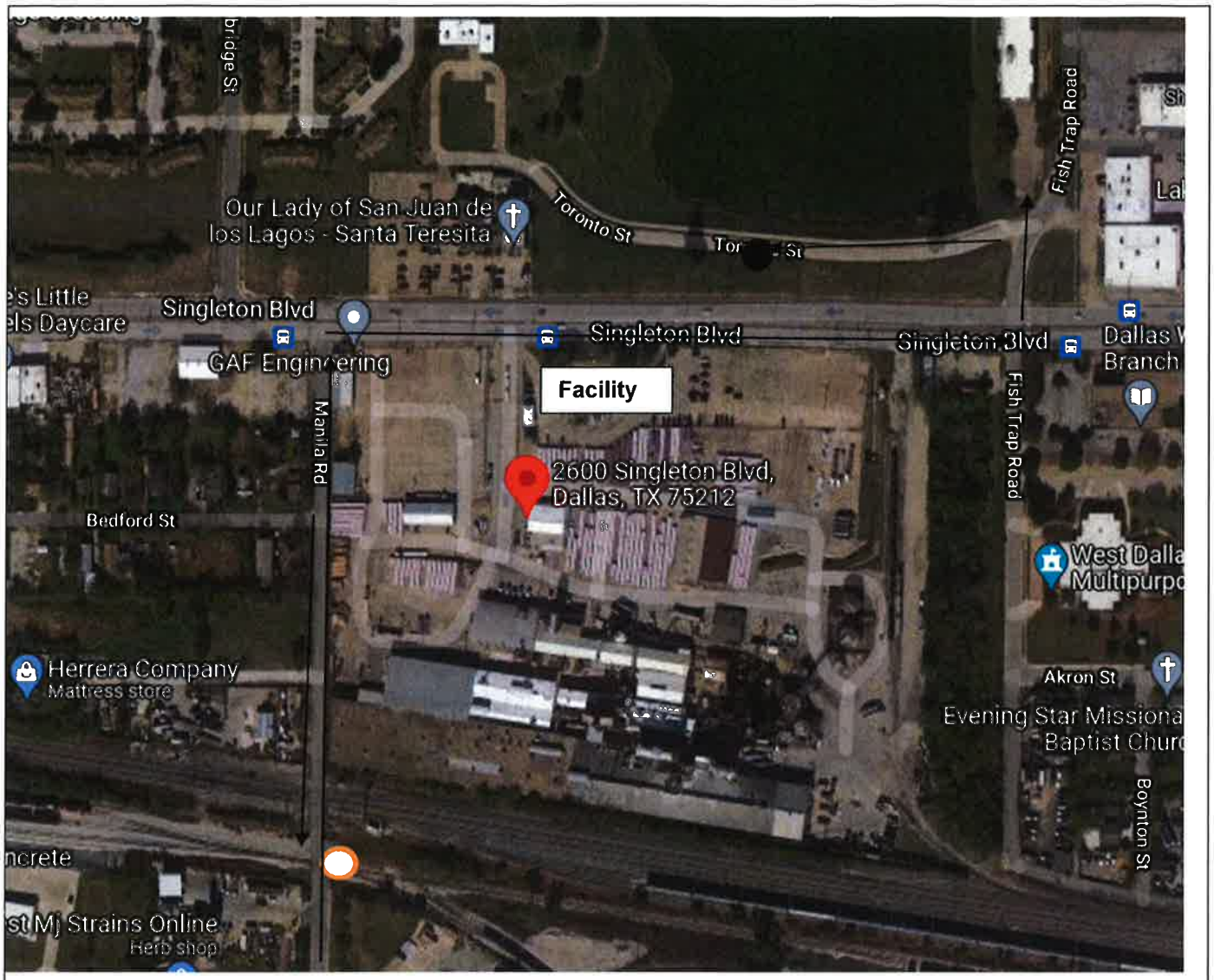
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

11/8/2021



Weather conditions: 13:00 hours – 60 F, northwest winds 14 mph, 19 % relative humidity, and sunny. 13:27 hours – 61 F, north winds 18 mph, 18 % relative humidity, and sunny

Odors were observed during the first weather conditions on Manila Rd between the two sets of railroad tracks downwinds from GAF Materials.

Map/Figure Legend
Black arrow – Pathway
Black Circle – Upwind location
White circle – Downwind location

City of Dallas

Attachment 4 Map/Figure
City of Dallas Local Air Program
Investigation 1774604
2600 Singleton Blvd
Dallas, TX 75212
11/18/2021

Inv # 1774604

Attachment 5

Compliance History

Total Pages (2 total)

CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

11/8/2021

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To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.

Compliance History Report

Compliance History Report for CN605251487, RN100788959, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator:	CN605251487, Building Materials Investment Corporation	**Classification:** HIGH	**Rating:** 0.00
Regulated Entity:	RN100788959, GAF MATERIALS	**Classification:** HIGH	**Rating:** 0.00
Complexity Points:	14	**Repeat Violator:** NO	
CH Group:	14 - Other		
Location:	2600 Singleton Blvd DALLAS, TX, DALLAS COUNTY		
TCEQ Region:	REGION 04 - DFW METROPLEX		

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER DB0378S
AIR OPERATING PERMITS PERMIT 2771
AIR NEW SOURCE PERMITS PERMIT 7711A
AIR NEW SOURCE PERMITS ACCOUNT NUMBER DB0378S
AIR NEW SOURCE PERMITS AFS NUM 4811300036
AIR NEW SOURCE PERMITS REGISTRATION 91414
AIR NEW SOURCE PERMITS REGISTRATION 147140
PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 23705
STORMWATER PERMIT TXR05CY76
AIR EMISSIONS INVENTORY ACCOUNT NUMBER DB0378S
POLLUTION PREVENTION PLANNING ID NUMBER P03577
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD044630895
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 31113
TAX RELIEF ID NUMBER 18801
TAX RELIEF ID NUMBER 19889
TAX RELIEF ID NUMBER 18802

Compliance History Period: September 01, 2016 to August 31, 2021 **Rating Year:** 2021 **Rating Date:** 09/01/2021

Date Compliance History Report Prepared: November 22, 2021

Agency Decision Requiring Compliance History: Information Request

Component Period Selected: September 01, 2016 to August 31, 2021

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: TCEQ Staff Member **Phone:** (512) 239-1000

For Informational Purposes Only

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period? YES
2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:
N/A

B. Criminal convictions:
N/A

C. Chronic excessive emissions events:
N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1*	December 01, 2016**	(1376672)
Item 2*	August 22, 2017**	(1428434)
Item 3*	July 24, 2018**	(1505087)
Item 4*	January 02, 2019**	(1531045)

Item 5	August 19, 2019**	(1581522)
Item 6*	June 19, 2020**	(1646307)
Item 7*	May 26, 2021**	(1722043)
Item 8*	July 22, 2021**	(1746067)

* No violations documented during this investigation

**Investigation occurred between 09/01/2016 and 08/31/2021.

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1 Date: 07/29/2019 (1581522)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to comply with all of the special conditions of Federal Operating Permit O-2771.

* NOVs applicable for the Compliance History rating period 9/1/2016 to 8/31/2021

F. Environmental audits:

*NOA/DOVs applicable for the Compliance History rating period 09/01/2016 to 8/31/2021

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

For Informational Purposes Only