CITY OF DALLAS

October 25, 2021

Building Materials Investment Corporation
Attn: Mr. Kevin Bush
202 Cedar Road
Ennis, TX 75119

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

Dear Mr. Bush,

On October 8th, 13th and 14th of 2021, Mr. Joseph Vu with the City of Dallas Air Compliance Program conducted a complaint investigation of the above-referenced address to evaluate compliance with applicable requirements for air pollution. No violations were documented during this investigation.

The City of Dallas Air Compliance Program and Texas Commission on Environmental Quality (TCEQ) appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. Please feel free to contact me at 214-670-4059.

Sincerely,

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

AIR CP_100788959_CP_20211008_Investigation_1765894

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 # 1765894

Investigator: JOSEPH VU

Conducted: 10/08/2021 -- 10/14/2021

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

Investigation Type: Compliance Investigation

Additional ID(s):

Incident Numbers
368480

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 MAIL CONTACT		MR KEVIN BUSH	Phone (972) 872-2325 [redacted]

Other Staff Member(s):

Role	Name
Supervisor	PAUL WHITE
QA Reviewer	PAUL WHITE

Associated Check List

Checklist Name	Unit Name

Investigation Comments:

Investigation Comments:
On October 8th, 13th and 14th of 2021, Mr. Joseph Vu, Environmental Investigator for the Dallas Local Air Program, conducted an Air Quality Complaint (AIR-CMPL) in the [redacted]

The purpose of the investigation was to respond to the complaint to evaluate compliance with Title 30 Texas Administrative Code (30 TAC) §101.4: General Rules for Nuisance Conditions, specifically for nuisance odor.

The complainant alleged nuisance odor conditions [redacted] which consisted of odors smelling like burnt rubber and asphalt tar. This was an unannounced investigation because it was initiated by a complaint. The purpose of this investigation was to perform an odor survey to assess current nuisance conditions and identify a possible source.

Daily Narrative:
The following is information regarding a description of the complaint:

COMPLAINANT NAME/ADDRESS:
This information is being handled as confidential and is included in the regional confidential file. Refer to Incident number 368480 for more information.

TIME, DATE, FREQUENCY, DURATION OF THE ODOR
The complainant alleged nuisance odors were detected along [redacted] potentially originating from the GAF Dallas facility. Nuisance odors consisted of burnt rubber and asphalt tar odors. The odors were detected during high winds coming from the south-southeast.

DESCRIBE ACTIVITY/OPERATIONS AT THE TIME OF THE COMPLAINT
The physical address given by the complainant was [redacted] The GAF Dallas facility was in operation at that time.

DESCRIPTION OF THE ALLEGED EFFECTS
The complainant alleged nuisance odors were detected along [redacted] potentially originating from the GAF Dallas facility.

INVESTIGATION INFORMATION
METEOROLOGICAL DATA AT THE TIME OF THE INVESTIGATION
10/08/2021 Temperature: 90°F, 37 % humidity, south-southwest 15 mph winds, and clear skies.
10/13/2021 Temperature: 78°F, 64 % humidity, south-southeast 12 mph winds, and broken skies.
10/14/2021 Temperature: 86°F, 71 % humidity, south 16 mph winds, and cloudy skies.
LOCATION OF THE ACTIVITY
Nuisance odor conditions were detected along [redacted] but alleged the GAF Dallas facility as the potential source of odors.

DESCRIPTION OF THE ACTIVITY
No visible emissions or smoke was observed by the complainant at the time of the nuisance odor incident. The GAF Dallas facility was in full operation according to the complainant.

DESCRIPTION OF THE EFFECTS ON THE INVESTIGATOR
No nuisance odor conditions were detected by the investigator; therefore, no effects were noted.

SOURCE EMISSIONS CONSISTENT WITH THE ALLEGED ACTIVITY
Based on the description of the nuisance odors by the complainant, the nuisance odor descriptions match the potential odors associated with operations performed at the GAF Dallas facility.

SPECIFIC CAUSE OF THE ODOR
No burning was observed at [redacted], but the potential source was alleged to be from the GAF Dallas facility.

COMPLAINANT LOG NECESSARY/ APPROPRIATE
On October 8, 2021, a copy of the TCEQ Odor Log for public use was provided to the complainant via email. No odor logs have been returned to the investigator by the complainant to date.

On 10/08/2021, Mr. Vu visited the complaint area around 2:30pm to perform an odor survey. No odors were detected at [redacted] Lumber/pinewood odors were detected at the intersection of Manila Road and Bedford Street coming from the GAF Dallas facility but did not match the complainant's description.

Later, 10/08/2021, the complainant responded to an inquiry by Mr. Vu via email describing the odors in detail and the conditions when the nuisance odors were experienced. The complainant confirmed that nuisance odors were not detected in the afternoon on 10/08/2021 but detected at 12:00pm and lasted for approximately 30 minutes.

Mr. Vu contacted Mr. Kevin Bush, Senior Environmental Engineer for the GAF Dallas facility on 10/08/2021 via email to inform them of the alleged nuisance odor complaint. Mr. Vu also inquired if any reportable/non-reportable emissions, deliveries of raw materials, or upsets to their production line were experienced on 10/08/2021 at 12:00pm. Mr. Bush responded on 10/12/2021 stating no reportable/non-reportable emissions, deliveries of raw materials, or upsets to their production line were experienced at the facility. In addition, there were on loading or unloading activities of raw materials in the morning of 10/08/2021 which could have caused the nuisance odor conditions.

On 10/13/2021, Mr. Vu visited the complaint area around 6:50am to perform an odor survey. Again, no odors were detected [redacted] or [redacted]. No odors were detected during the odor survey.

On 10/14/2021, Mr. Vu visited the complaint area around 3:35pm to perform an odor survey. Again, no odors were detected at [redacted]. No odors were detected during the odor survey.

On 10/14/2021, Mr. Vu informed the complainant of the results of the investigation and inquired if the complainant would like to receive a copy of the investigation report and if the complainant has completed the TCEQ Odor log. To date, the complainant has not responded to the inquiry.

Exit Interview:
Mr. Bush was informed via email no violations will be issued and a general compliance letter will be sent.

GENERAL FACILITY AND PROCESS INFORMATION
Process Description:
Alleged nuisance odor conditions were originating near Savor by Samir, a full-service catering company.
BACKGROUND
GAF Materials RN:100788959 Classification: High Rating: 0.0
Build Materials Investment Corporation CN:605251487 Classification: High Rating: 0.0

Agreed Orders, Court Orders, and other Compliance Agreements:
No violations were noted during this investigation.

Prior Enforcement Issues:
No violations were noted during this investigation.

Complaints:
A total of eight (8) complaints have been received against the GAF Dallas facility from 2016 through 2021. No

complaints have resulted in Notice of Violations or Notice of Enforcements.

ADDITIONAL INFORMATION
Conclusions, Recommendations, and Current Enforcement Action:
No violations are being alleged at this time. A general compliance letter will be sent to the facility. Close Incident 368480

Additional Issues:
No additional issues were noted during this investigation.

Attachments:
1. Map Figures

No Violations Associated to this Investigation

Signed _____ **Date** 10/22/21
Environmental Investigator

Signed _____ **Date** 10/22/21
Supervisor

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
X 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) :

Inv 1765894

Attachment 1

Map/figures

Total Pages 3

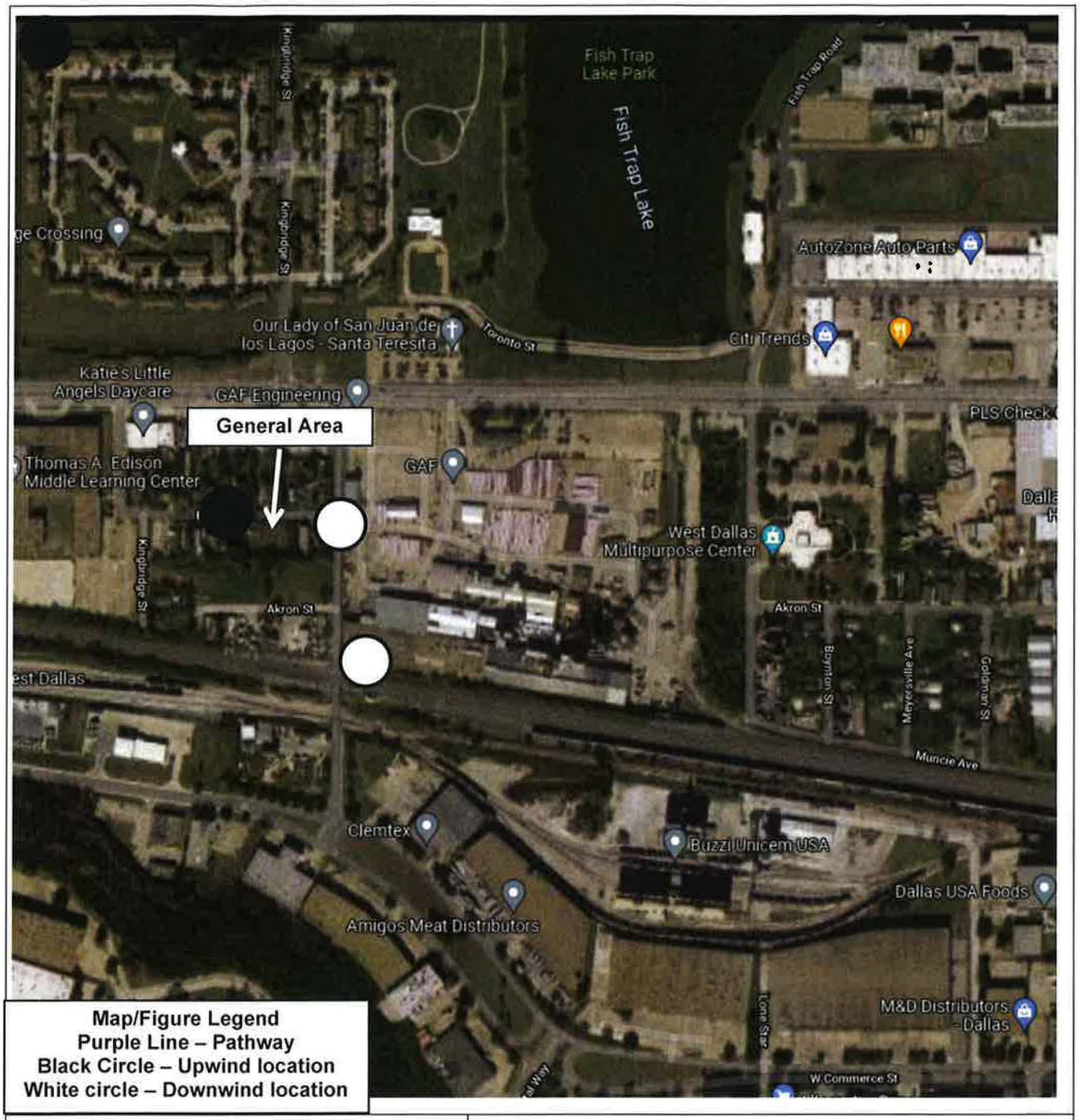
CN605251487

RN1007889859

Building Materials Investment Corporation

GAF Materials

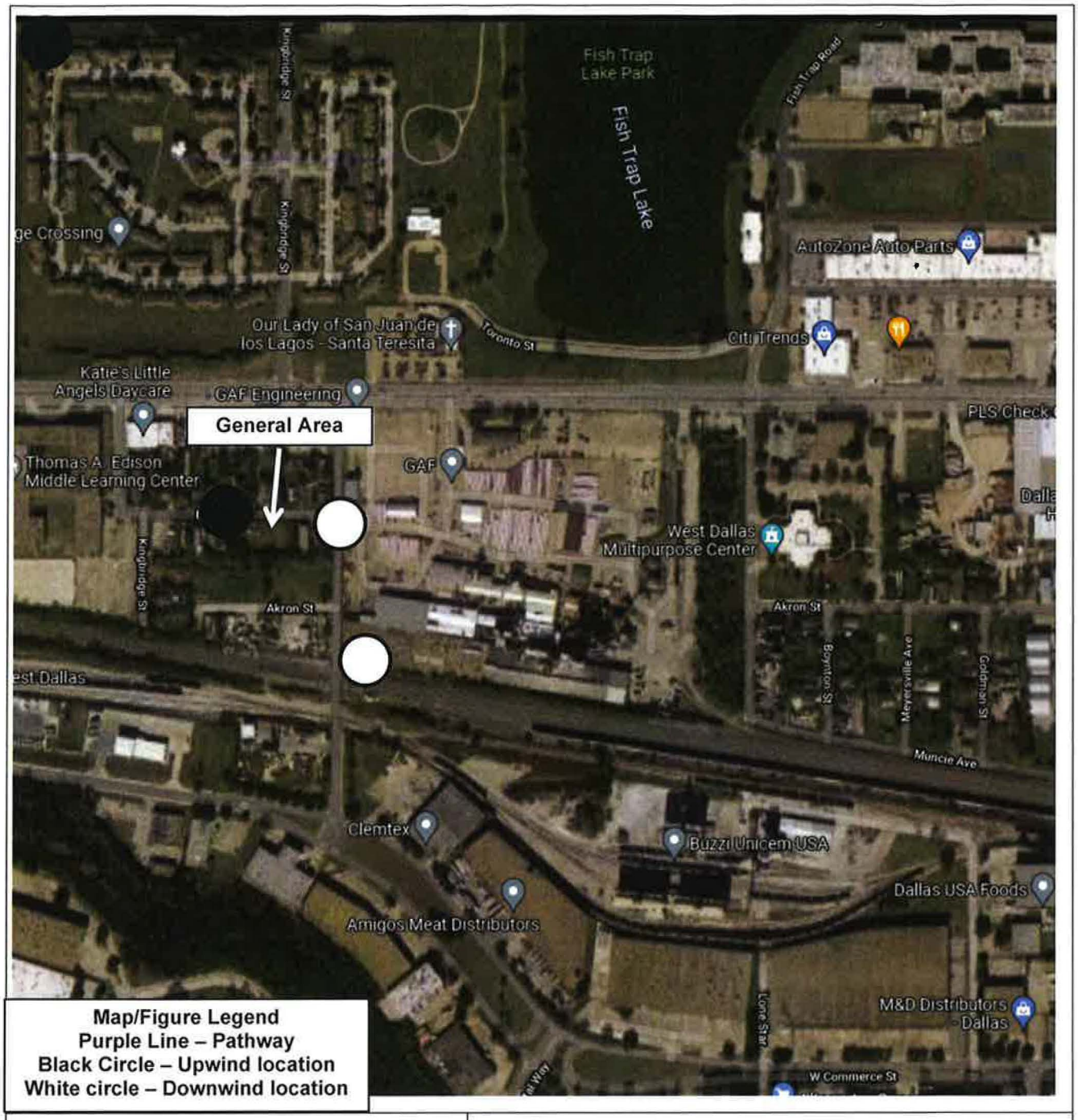
10/08/21 through 10/14/2021



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

City of Dallas

Attachment 1 Map/Figures
City of Dallas Local Air Program
Investigation 1765894
10/08/2021
[redacted]
Dallas, TX 75212



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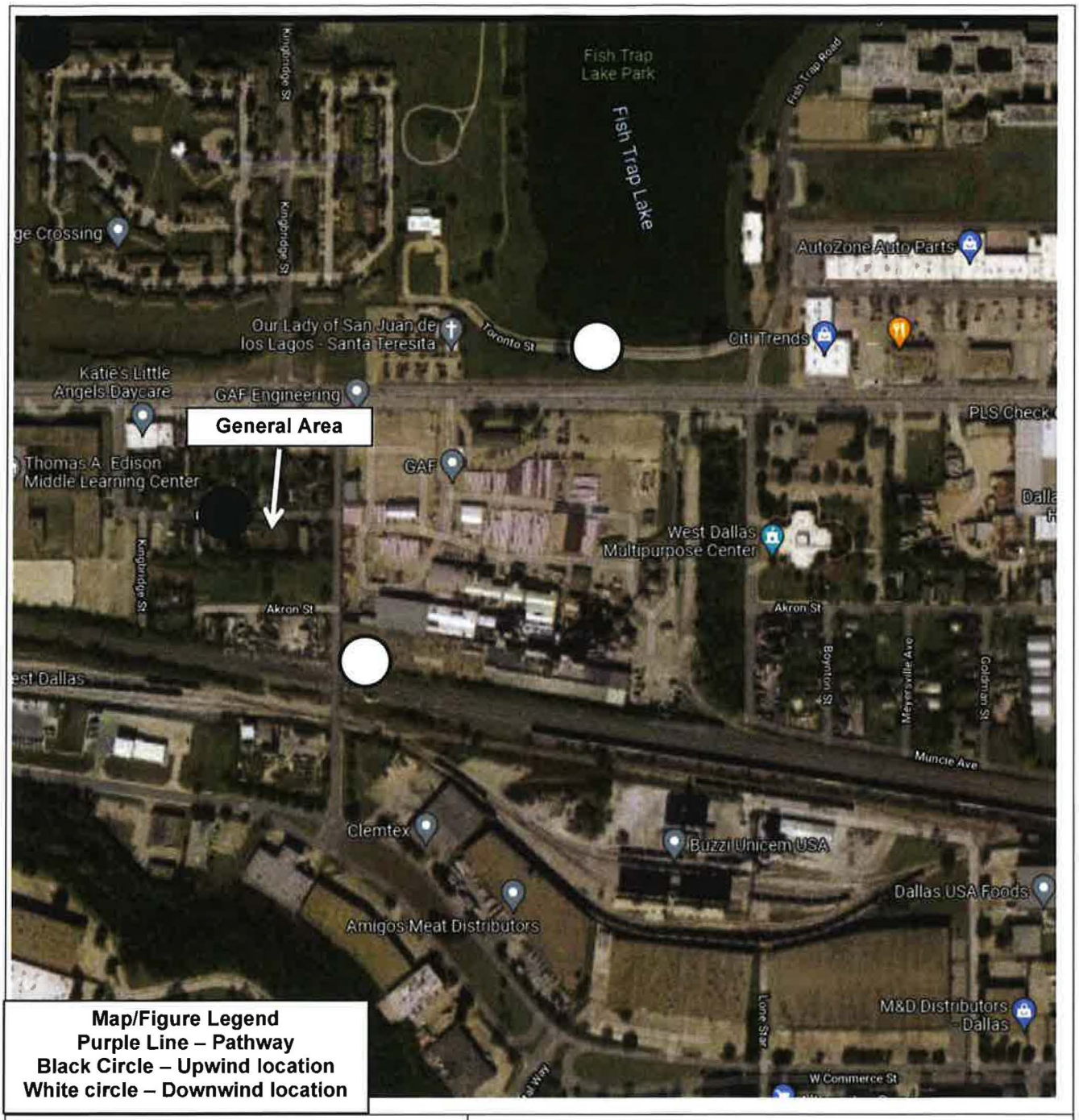

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