

Document Control Sheet

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Date:	1/28/2022 12:00AM
Title:	Investigation
Tertiary ID	1796004

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Texas Commission on Environmental Quality Investigation Report

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Customer: Building Materials Investment Corporation Customer Number: CN605251487

Regulated Entity Name: GAF MATERIALS

Regulated Entity Number: RN100788959

Investigation # 1796004

Incident Numbers

374644	374326
374328	374325
374648	374318
374336	374319
374324	374335

Investigator: JOSEPH VU

Site Classification MINOR SOURCE
MAJOR SOURCE

Conducted: 01/28/2022 -- 02/14/2022

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

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

Investigation Type: Compliance Investigation

Location: 2600 Singleton Blvd

Additional ID(s): 7711A
147140
2771
91414

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
PARTICIPATED IN	PLANT MANAGER	MR WAYNE SCOTT	Cell (917) 604-2264 Phone (214) 637-8964
REGULATED ENTITY MAIL CONTACT	SENIOR ENVIRONMENTAL ENGINEER	MR KEVIN BUSH	Office (972) 872-2325

Other Staff Member(s):

Role	Name
QA Reviewer	ADRIANNE JOHNSON
Supervisor	PAUL WHITE

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Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR COMPLAINT INVESTIGATION	2771

Investigation Comments:

INTRODUCTION

On January 28, 2022 and February 8th, 9th, and 14th of 2022, Mr. Joseph Vu, environmental investigator with the City of Dallas Local Air Program (LAP), conducted air complaint investigations (Air-CMPLs) at the GAF Materials facility located at 2600 Singleton Boulevard in Dallas, TX 75212. Mr. Kevin Bush, Senior Environmental Engineer for GAF Materials, was notified of the complaints on January 28, 2022, February 7th, 9th, 14th and 16th of 2022. Mr. Bush will serve as the regulated entity mail contact. Mr. Wayne Scott, Plant Manager for GAF Materials, participated in the investigation and acted as an escort.

This was an unannounced investigation because it was initiated by complaints. The purpose of the investigation was to respond to Incidents 374318, 374319, 374324, 374325, 374326, 374328, 374335, 374336, 374644, 374648 received via The City of Dallas 311 service on January 26, 2022, February 4th, 5th, 11th, 13th, and 15th of 2022.

Complainant A is associated with incidents 374318 and 374319;
Complainant B is associated with incidents 374324, 374325, 374644;
Complainant C is associated with incident 374326;
Complainant D is associated with incidents 374328 and 374335;
Complainant E is associated with Incident 374336; and
Complainant F is associated with Incident 374648.

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

Complainant A submitted complaints on January 26, 2022 and February 5, 2022 alleging health impacts in the form of headaches, burnings of the throat and lungs, and trouble breathing as a result of detecting burnt rubber or asphalt tar odors for a duration of approximately 30 minutes. Complainant A alleged the source of the odors to be originating from the GAF Materials facility. Contact was made with Complaint A on January 28, 2022, February 7th and 15th of 2022.

Complainant B submitted complaints on February 4th, 5th, and 13th of 2022 alleging health impacts in the form of vomiting and trouble breathing as a result of detecting decaying organic matter, sewage, or rancid garbage. Complainant B alleged the odors are detected daily in the early morning hours as well as the afternoon and evening hours. Complainant B alleged the source of the odors were originating from GAF Materials facility located more than 2 miles from Complainant B's property. Contact was made with Complainant B on February 8th, 9th, 11th, 14th, 15th, and 17th of 2022. Complainant B was informed the odors described did not match the type of odors for which GAF Materials are associated with, asphalt tar. Mr. Vu informed Complainant B their odor description matches the activities of the Trinity River Authority Wastewater facility located in Irving, TX in closer proximity than the GAF Materials facility. When informed of the proximity of the wastewater facility and the discrepancy in odor descriptions, Complainant B still alleged GAF Materials as the origin of the detected odors.

Complainant C submitted a complaint on February 5, 2022 alleging odors interfering with the enjoyment of their property. The odors detected by Complainant C consisted of burnt rubber or asphalt tar. Complainant C alleged the source of the odors was GAF Materials. Complainant C also observed visible emissions from GAF Materials observed the morning of February 5, 2022. The visible emissions were observed for duration of 1 hour or more according to Complainant C. Contact was made with Complainant C on February 8th, 14th, and 15th of 2022.

Complainant D submitted complaints on February 5th and 11th of 2022, alleging health impacts in the form of headaches and trouble breathing as a result of detecting burnt rubber or asphalt tar odors. On February 5, 2022, Complainant D alleged headaches, trouble breathing, and watery eyes were experienced as a result of detecting the burnt rubber and asphalt tar odors. On February 11, 2022, Complainant D alleged they experienced headaches and trouble breathing from detecting the odors. Complainant D alleged the source the odors to be GAF Materials. Contact was made with Complainant D on February 7th, 11th, and 15th of 2022.

Complainant E submitted a complaint on February 5, 2022 alleging a regulatory concern as a result of detecting

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strong chemicals. Complainant E described the odor as man-made, a chemical odor for sure, but could not discern exactly what type of chemical odor. Complainant E alleged the source of the odors to be GAF Materials. Contact was made with Complainant E on February 8th and 15th of 2022.

Complainant F submitted a complaint on February 15, 2022 alleging odors consisting of asphalt tar or burnt rubber originating from GAF Materials. Complainant F did not allege health impacts but a regulatory concern. Since an odor was detected, there may be a regulatory issue regarding GAF Materials. Contact was made with Complainant F on February 16th, 17th, and 18th of 2022.

The following information is a description of the complaint(s) received.

COMPLAINANT NAME/ADDRESS

This information is being handled as confidential and is included in the confidential file. Refer to Incident Numbers 374318, 374319, 374324, 374325, 374326, 374328, 374335, 374336, 374644 and 374648 for more information.

TIME, DATE, FREQUENCY, AND DURATION OF THE ODOR

The complainant(s) allege nuisance odor conditions on January 26, 2022, February 4th, 5th, 11th, 13th, and 15th of 2022. According to the complainant's description, the odors were detected in the mornings and afternoons of each day and lasted between 10 minutes to more than 1 hour. See each specific incident for additional information.

DESCRIBE ACTIVITY/OPERATIONS OCCURRING AT TIME OF THE COMPLAINTS

According to the GAF Materials representatives, the production lines were offline on January 26, 2022 for preventative maintenance and between February 2nd through the 5th of 2022 due to inclement weather. All other dates when complaints were received, GAF Materials confirmed they production line was in operation. According to each complainant, they allege GAF Materials facility appeared to be in operation at the time of each complaint.

DESCRIPTION OF THE ALLEGED EFFECTS

Complainant A, B, and D alleged health impacts; while Complainant C alleged interference of enjoyment of their property, and Complainant E and F alleged a regulatory concern. See above for details of alleged effects by each complainant.

INVESTIGATION INFORMATION

METEOROLOGICAL DATA OBTAINED AT THE TIME OF THE INVESTIGATIONS

January 28, 2022 - 42 degrees Fahrenheit, nine (9) miles per hour (mph) from the northwest, 48% relative humidity, and cloudy skies

February 8, 2022 - 36 degrees Fahrenheit, four (4) mph winds from the southwest, 67% relative humidity, and clear skies

February 9, 2022 - 67 degrees Fahrenheit, six (6) mph winds from the northwest, 21% relative humidity, and cloudy skies

February 14, 2022 - 70 degrees Fahrenheit, 12 mph winds from the southwest, 19% relative humidity, and cloudy skies

LOCATION AND DURATION OF THE ODORS:

On January 28, 2022, Mr. Vu detected odors consisting of asphalt tar at the intersection of Fish Trap Road and Muncie Avenue. The winds that day were coming from the northwest to the southeast. The odors were detected at an intensity of light to moderate throughout a 15-minute period. However, the consistency to detect the odor was infrequent. The odors were detected in 30-45 second intervals between 1-3 minutes of no odors detected. The odors appeared to be influenced by the wind speed. Mr. Vu relocated to the intersection of Muncie Avenue and North Hampton Road as well as the intersection of Lone Star Drive and West Commerce Street to determine the extent of the odor plume. The odors did not appear to extend past the intersection of Fish Trap Road and Muncie Avenue.

On February 14, 2022, Mr. Vu detected odors consisting of asphalt tar at the intersection of Fish Trap Road and Toronto Street. The winds that day were coming from the southwest to the northeast. Odors were detected at the intersection of Toronto Street and Fish Trap Road for a duration of 6 minutes out of a total duration of 15 minutes. Odors were detected at light to moderate intensities for 10-12 second intervals. There would be brief

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periods of 30-50 seconds of no detected odors and then the odors would return. After 6 minutes of detected odors, odors were no longer present. The odors appear to be influenced by the wind speed. After 15 minutes, Mr. Vu relocated to the intersection of Fish Trap Road and Dennison Street to determine the extent of the odor plume. The odors did not appear to extend past Fish Trap Lake.

No other odors were detected on any other dates, survey points, or along the odor survey route. In addition, no odors matching the description of Complainant B were ever detected by the investigator during the investigation process.

Figures depicting the odor survey route are attached to this investigation report (Attachment 1 - Maps/Figures).

DESCRIPTION OF THE ODOR

On January 28, 2022, Mr. Vu detected odors consisting of asphalt tar at the intersection of Fish Trap Road and Muncie Avenue.

On February 14, 2022, Mr. Vu detected odors consisting of asphalt tar at the intersection of Fish Trap Road and Toronto Street.

No other odors were detected on any other dates, survey points, or along the odor survey route.

DESCRIPTION OF THE EFFECTS ON THE INVESTIGATOR

Mr. Vu did not experience any effects to his wellbeing on January 28, 2022 or February 14, 2022. No other odors were detected on any other dates, survey points, or along the odor survey route; therefore, no effects were reported either.

SOURCE EMISSIONS CONSISTENT WITH THE ALLEGED ODOR

Odors detected by Mr. Vu appear to match the descriptions and allegations from the complainants. The odors also appear to be originating from the GAF Materials facility located at 2600 Singleton Boulevard. The only exception being, the odors detected near GAF Materials facility did not match the description from Complainant B. Complainant B described the odors to consist of a decaying organic odor, similar to rancid garbage and also Sulphur like odors.

DESCRIBE ACTIVITY/OPERATIONS OCCURRING AT TIME OF INVESTIGATION

Correspondence with the GAF Material facility representatives confirm the plant was in operation when Mr. Vu visited the area. The GAF Material facility was operating at normal capacity producing and packaging asphalt shingles.

DESCRIPTION OF THE LAND USE IN THE AREA SURROUNDING

The primary land use of the surrounding area is a mix of commercial industrial businesses and residential properties. Fish Trap Lake is located cardinally north of GAF Materials, while Muncie Avenue is cardinally southeast of GAF Materials.

DESCRIPTION OF THE TERRAIN FEATURES OF THE AREA

The terrain is generally flat with large open areas consisting of Fish Trap Lake Park and City Rights of Ways with residential and commercial/industrial buildings throughout the area.

LOCATION OF THE SOURCE OF THE ODOR

Based on previous investigations and the current surveys conducted, the location of the source appears to be originating from the GAF Materials facility located at 2600 Singleton Boulevard.

SPECIFIC CAUSE OF THE ODOR

The specific cause of the odors is suspected to be from the daily operations and activities of the GAF Materials plant, which manufactures, stores, and transports asphalt roofing shingles.

COMPLAINANT LOG NECESSARY/APPROPRIATE

Written Statements and TCEQ Odor logs were provided on January 28, 2022 to Complainant A, while the forms were provided to Complainant B, C, D on February 8, 2022. Complainant E and F were provided the documents on February 9th and 15th of 2022.

Complainant B has returned written statements on February 11th and 14th of 2022. Complainant C returned a written statement and odor log on February 11, 2022. No other documents were received from other

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Complainants.

Daily Narrative

On January 27, 2022, Mr. Vu contacted the facility representatives with GAF Materials to inform them of the complaint allegation and schedule an onsite tour. The onsite tour was tentatively scheduled for February 3, 2022.

On January 28, 2022, Mr. Vu visited the complaint area and performed an odor survey to confirm the allegations made by the complainant. Mr. Vu performed odor survey points cardinally west, north, and east of GAF Materials. Mr. Vu detected odors matching the alleged odor descriptions from the complainant at the intersection of Fish Trap Road and Muncie Avenue, cardinally southeast of GAF Materials. The odors were detected inconsistently for a duration of 15 minutes with varying levels of intensity (light to moderate). The odors consisted of asphalt tar odors. Mr. Vu did not detect the odors after 12 minutes of observation but stayed an additional 3 minutes. Mr. Vu also did not detect the odors anywhere else along the survey route. Mr. Vu did not experience any health impacts to his persons.

On February 3, 2022, it was determined due to inclement weather, the onsite tour would be rescheduled until February 9, 2022 when the weather conditions improved.

On February 8, 2022, Mr. Vu visited the complaint area and performed additional odor surveys to confirm allegations made by multiple complainants. Mr. Vu visited the area near Chalk Hill Road and Interstate 30, as well as cardinally west, north, and east of GAF Materials. No odors were detected along the survey route nor at any of the odor survey points. Mr. Vu did not experience any health impacts to his persons.

On February 9, 2022, Mr. Vu visited the complaint area and performed additional odor surveys to confirm the allegations made by multiple complainants. Mr. Vu again visited the same areas as February 8, 2022 and did not detect any odors during the surveys. Mr. Vu did not experience any health impacts to his person.

After the conclusion of the odor survey, Mr. Vu met onsite at GAF Materials with Mr. Kevin Bush, the Senior Environmental Engineer, and Mr. Wayne Scott, GAF Materials Plant Manager to conduct an interview and tour of the facility. An interview was performed prior to an onsite tour, updates were provided by Mr. Bush and Mr. Scott regarding designing upgrades for additional equipment to the production line. Equipment descriptions included coalescing filters, granulated activated carbon filters, dedicated air intake vents from certain points of the production line, and software to control the equipment. GAF Material representatives stated the upgrades and equipment are currently in the design phase. Mr. Vu inquired about operational days and hours, particularly on days where complaints were received. GAF representatives stated they would review their operational status and provide an electronic response on a later date. Mr. Bush informed Mr. Vu that the production line was inactive due to preventative maintenance from 5am-12pm on January 26, 2022. The representatives did state that during the first week of February 2022 when inclement weather was experienced, the production lines were not in operation. Mr. Vu also inquired about visible emissions and the different plumes of white smoke visible at the facility. The representatives stated the white plumes were likely steam vapor plumes originating from the boiler system. The representatives also stated no visible emissions have been recorded or documented since July 2021 through February 9, 2022, the time period Mr. Vu inquired about. Visible emissions are observed and recorded on a weekly basis by certified individuals (Mr. Bush and Mr. Scott). Mr. Vu requested records for both the operational hours for the dates of the complaints as well as the visible emissions records. A TCEQ Exit Interview for a Records Request was submitted to Mr. Bush and Mr. Scott via email after the conclusion of the onsite tour (Attachment 2 - TCEQ Exit Interview Form).

After the interview was concluded, an onsite tour was conducted to identify emission points and to view areas where complainants alleged visible emissions. Mr. Bush and Mr. Scott both stated the GAF Materials facility has multiple boiler systems constantly in operation to help control, heat, and move products used in the asphalt shingle manufacturing process. The GAF Materials representatives pointed out each emission point that requires record keeping efforts to document any visible emissions. The emission points identified were the silo baghouse filters for the aggregate system and the thermal oxidizer. At the time of the tour, the facility was in full operation; in addition, no visible emissions were observed coming from the silo baghouse filters or the thermal oxidizer. Mr. Vu also photographed the emissions points as well as multiple steam vents and caps. Mr. Vu did observe visible emissions originating from boiler vent pipes, condensate return vent pipes, and pressure relief vent pipes in the form of white plumes. Mr. Vu inquired with the GAF Materials representatives what the white plumes consisted of. The representatives stated because these are relief vent pipes or vent pipes associated with the boiler system, they were confident the white plumes consisted of heated water vapor since water is the only constituent used in

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the boiler system. The representatives also stated on cold temperature days with high relative humidity, the likelihood of steam vapor forming from the vent pipes were high and likely what the complainant were observing. Based on the tour of the facility and explanation of each vent pipe and emission point, the visible emissions were not emissions that require recordkeeping or reporting by GAF Materials since they consists of steam vapor from the boiler vent pipes, condensate return vent pipes, and pressure relief vent pipes. Photographs documenting the areas Mr. Vu observed and descriptions of the emission points are attached to this report (Attachment 3 - Photographic Log).

Mr. Bush and Mr. Scott were informed onsite that no violations were being alleged at that point in time and a records request will be emailed to them shortly after.

On February 14, 2022, Mr. Vu returned to the complaint area to perform the last odor survey to confirm allegations made by multiple complainants. Mr. Vu visited the area near Chalk Hill Road and Interstate 30, as well as cardinaly west, north, and east of GAF Materials. Odors consisting of asphalt tar were detected at the intersection of Toronto Street and Fish Trap Road for a duration of 6 minutes out of a total duration of 15 minutes. Odors were detected at light to moderate intensities for 10-12 second intervals. There would then be brief periods of 30-50 seconds of no detected odors and then the odors would return. After 6 minutes of detected odors, odors were no longer present. It appeared the wind speed contributed to the detected odors. Mr. Vu then relocated to the intersection of Fish Trap Road and Dennison Street to determine the extent of the plume. No odors were detected at this intersection. Mr. Vu did not experience any health impacts to his persons.

On February 15, 2022, Mr. Bush provided a response via email stating the manufacturing line was shutdown at 11am on February 2, 2022 in anticipation of the inclement weather experienced. The manufacturing line was offline until 12pm on February 5, 2022. In the response, visible emission records were also provided for the GAF Materials facility from July 2, 2021 through February 9, 2022.

Based on the review of provided response, Mr. Vu determined no alleged violations have been confirmed against GAF Materials at that time. In addition, Mr. Vu determined the complaint allegations could not be substantiated at this time and did not meet the level required to be defined as nuisance odor condition.

Exit Interview

On February 9, 2022, a TCEQ Exit Interview Records Request form was submitted to the GAF Materials representative via email. On February 15, 2022, Mr. Vu communicated to all complainants via email that the complaint allegations could not be confirmed, and no violations were issued as a result of the investigation; also letters and copies of the investigation report will be provided to them if requested. In addition, Mr. Vu also informed Mr. Bush and Mr. Scott no violations are being alleged at this time and a general compliance letter will be sent to their attention.

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.

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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

RN100788959 GAF Materials

Classification: High Rating: 0.0

CN605251487 Build Materials Investment Corporation

Classification: High Rating: 0.0

Agreed Orders, Court Orders, and Other Compliance Agreements

There are no violations issued as a result of this investigation.

Prior Enforcement Issues

There are no violations issued as a result of this investigation.

Complaints

A total of 17 other complaints have been submitted against GAF Materials in the last two years. No violations have been issued as a result of the previous investigations.

Trend Analysis of Current and Past Complaints/Investigation Observations

Odors have been detected during previous complaint investigations performed on GAF Materials. The odors were not detected at the place of the complainant's property. However, the odors were detected offsite from the GAF Materials property line. The detected odors did not meet the level of requirement for a Notice of Violation. There is a potential for odors detected by the investigators to become nuisance odor conditions per 30 TAC 101.4.

ADDITIONAL INFORMATION

Conclusions, Recommendations, and Current Enforcement Actions

No violations were issued as a result of this investigation. Close incident #'s 374318, 374319, 374324, 374325, 374326, 374328, 374335, 374336, 374644, and 374648.

Additional Issues

There is a potential for the odors detected by the investigators to become nuisance odor conditions. The odors detected offsite from the GAF Materials by the investigators matched the alleged descriptions from the complainants. However, the odor conditions currently do not meet the level of requirement to be a Notice of Violation. The detected odors will be documented as an additional issue and conveyed to the representatives at GAF Materials.

Attachments

- 1) Odor Survey Map(s)
- 2) TCEQ Exit Interview - Records Request
- 3) Photographic Log

No Violations Associated to this Investigation

Signed Joseph V.
Environmental Investigator

Date 03/25/2022

Signed R. Williams
Supervisor

Date 3/25/2022

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

- 1 Maps, Plans, Sketches
- 3 Photographs
- Correspondence from the facility
- Other (specify) :
- 2) TCEQ Exit Interview Form

Inv 1796004

Attachment 1

Map/figures

Total Pages 7

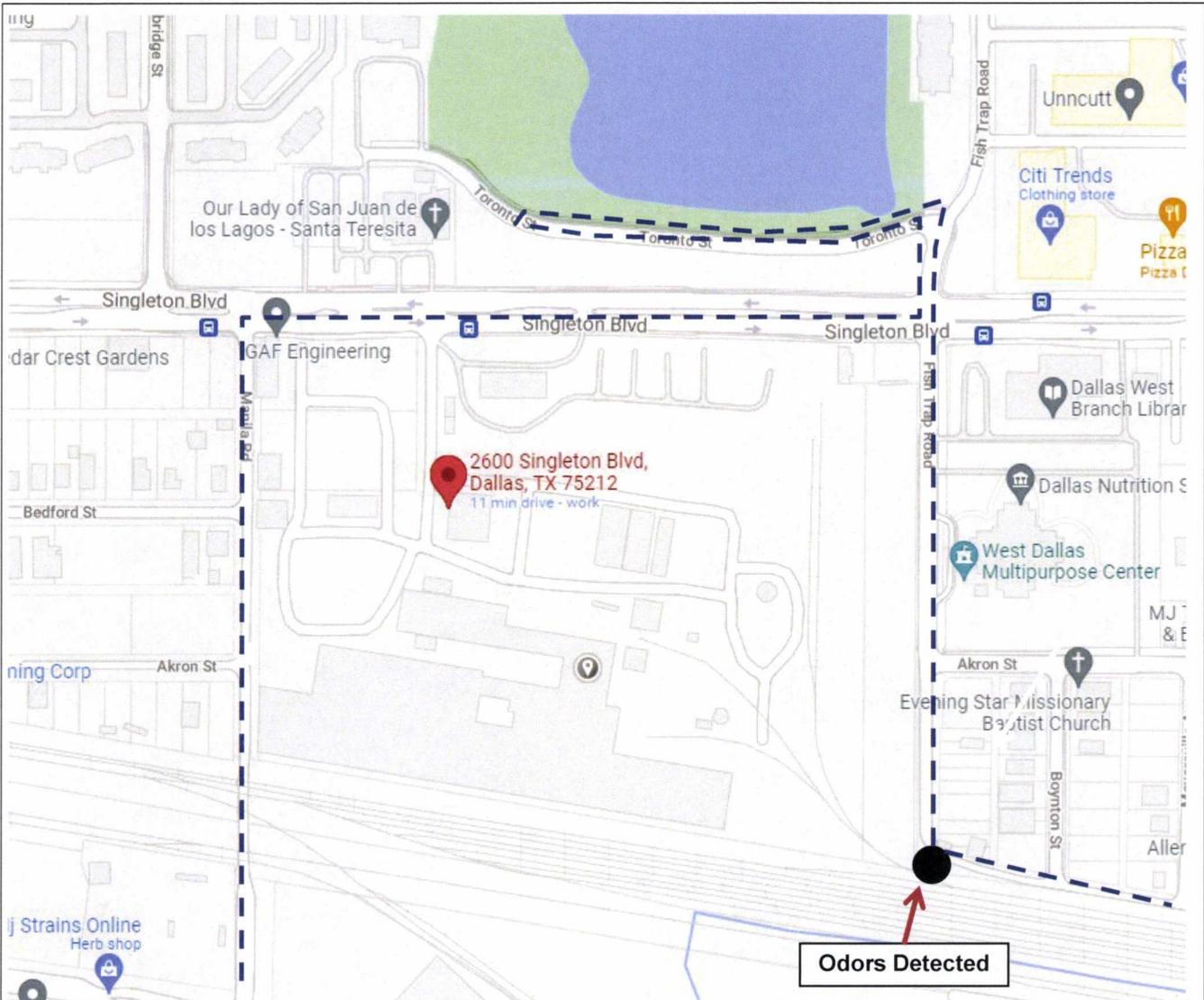
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RN100788959

Building Materials Investment Corporation

GAF Materials

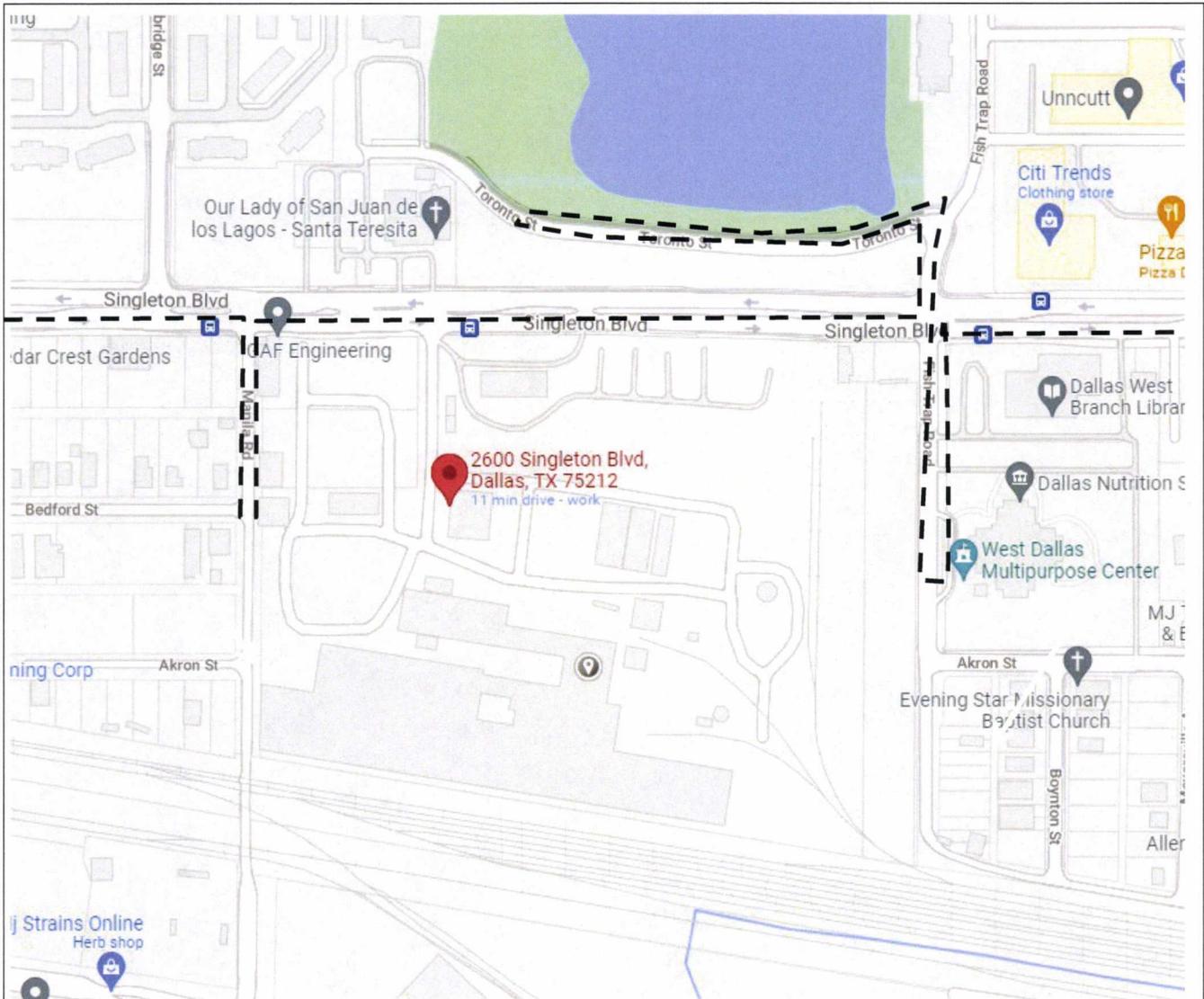
01/28/2022 - 02/14/2022



Legend
 Dashed Black Line – Survey Route
 01/28/2022
 9:20am-10:20am
 Winds at 9 mph NW



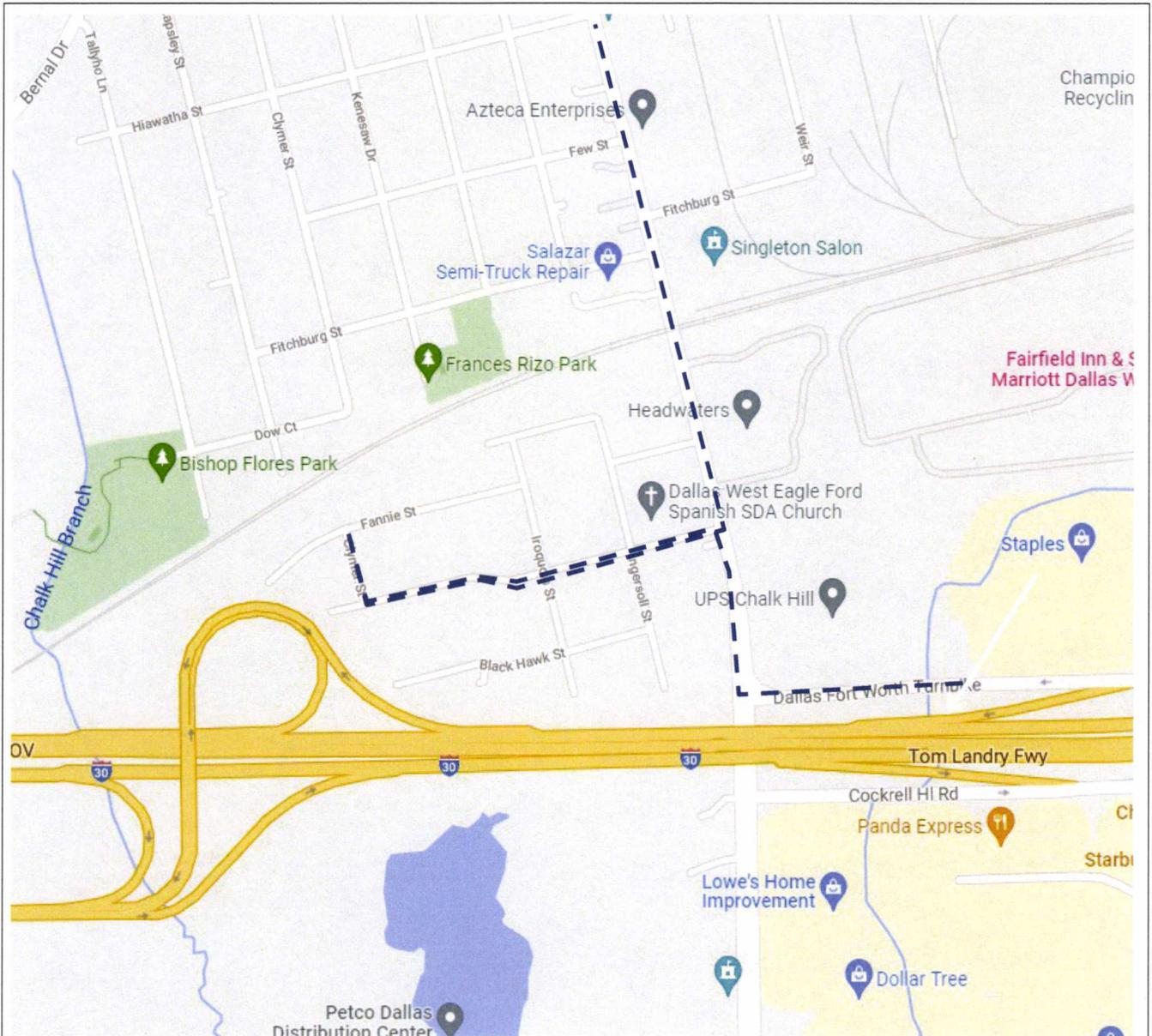
Attachment 1 Odor Survey Route Map
 City of Dallas Local Air Program
 Investigation 1796004
 GAF Materials
 2600 Singleton Boulevard
 Dallas, TX 75212



Legend
 Dashed Black Line – Survey Route
 02/08/2022
 7:20-7:55am
 Winds at 4 mph SW
 No odors detected



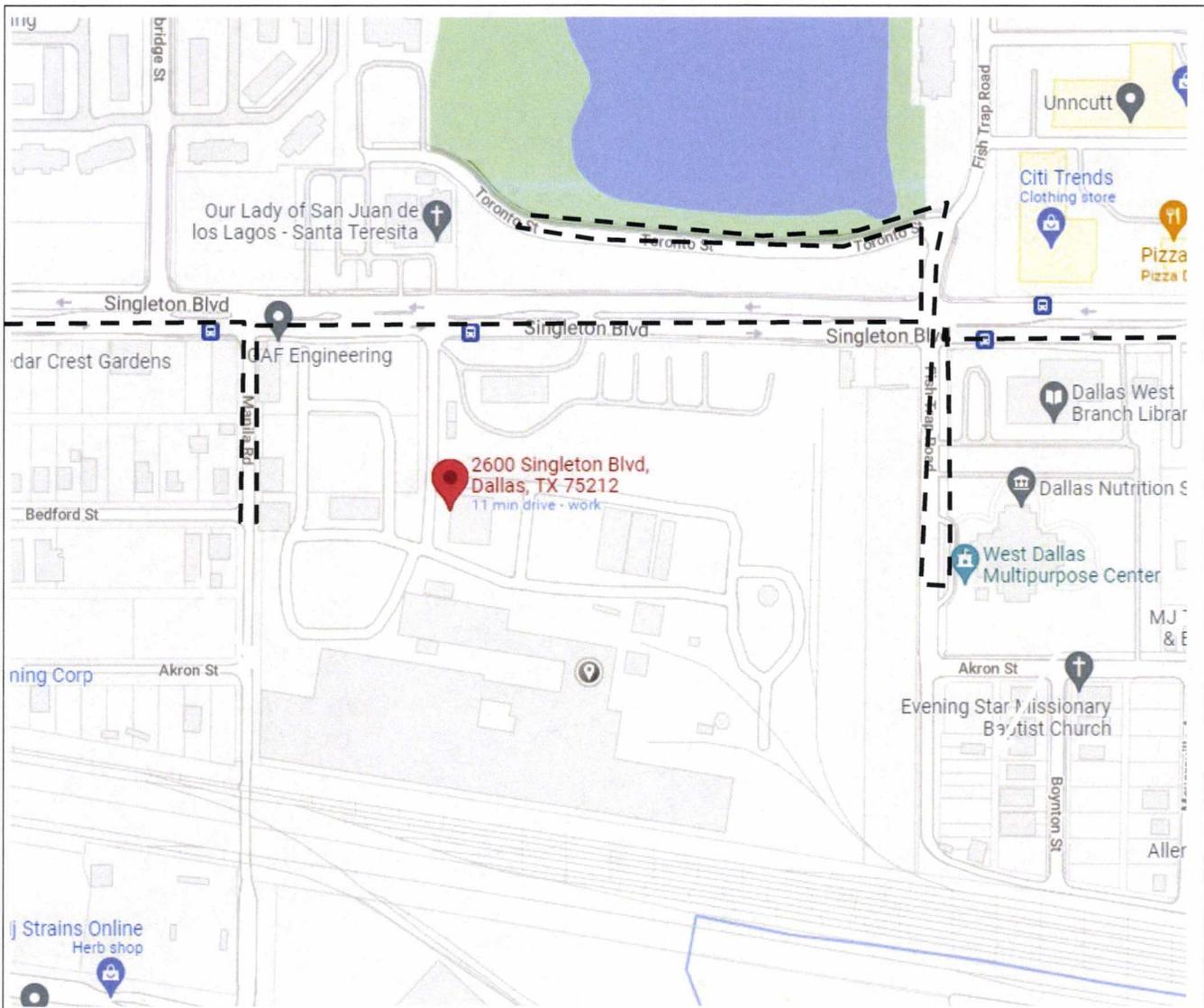
Attachment 1 Odor Survey Route Map
 City of Dallas Local Air Program
 Investigation 1796004
 GAF Materials
 2600 Singleton Boulevard
 Dallas, TX 75212



Legend
 Dashed Black Line – Survey Route
 02/08/2022
 6:45am-7:20am
 Winds at 4 mph SW
 No odors Detected



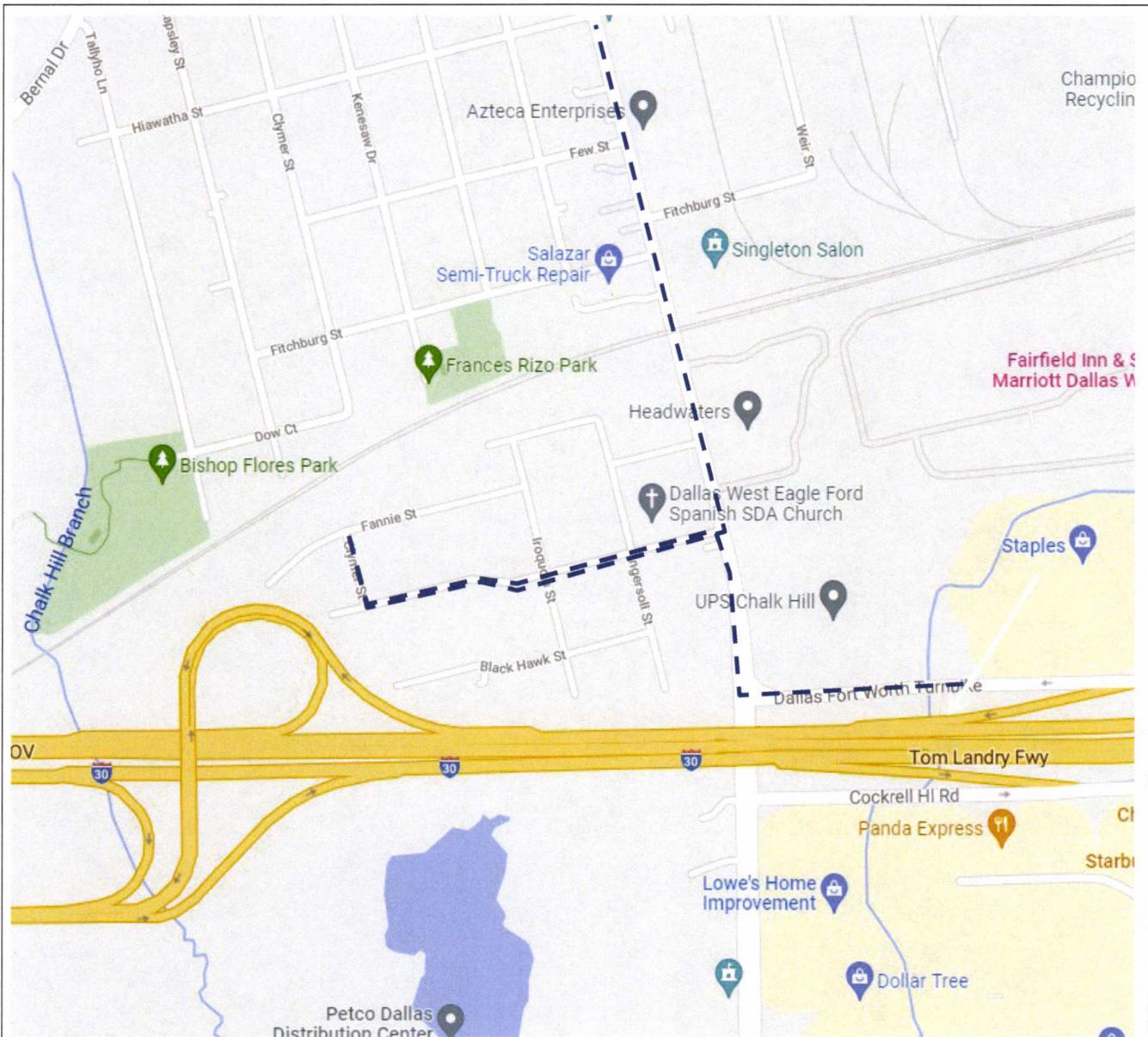
Attachment 1 Odor Survey Route Map
 City of Dallas Local Air Program
 Investigation 1796004
 GAF Materials
 2600 Singleton Boulevard
 Dallas, TX 75212



Legend
 Dashed Black Line – Survey Route
 02/09/2022
 1:10pm-1:55pm
 Winds at 6 mph NW
 No odors detected



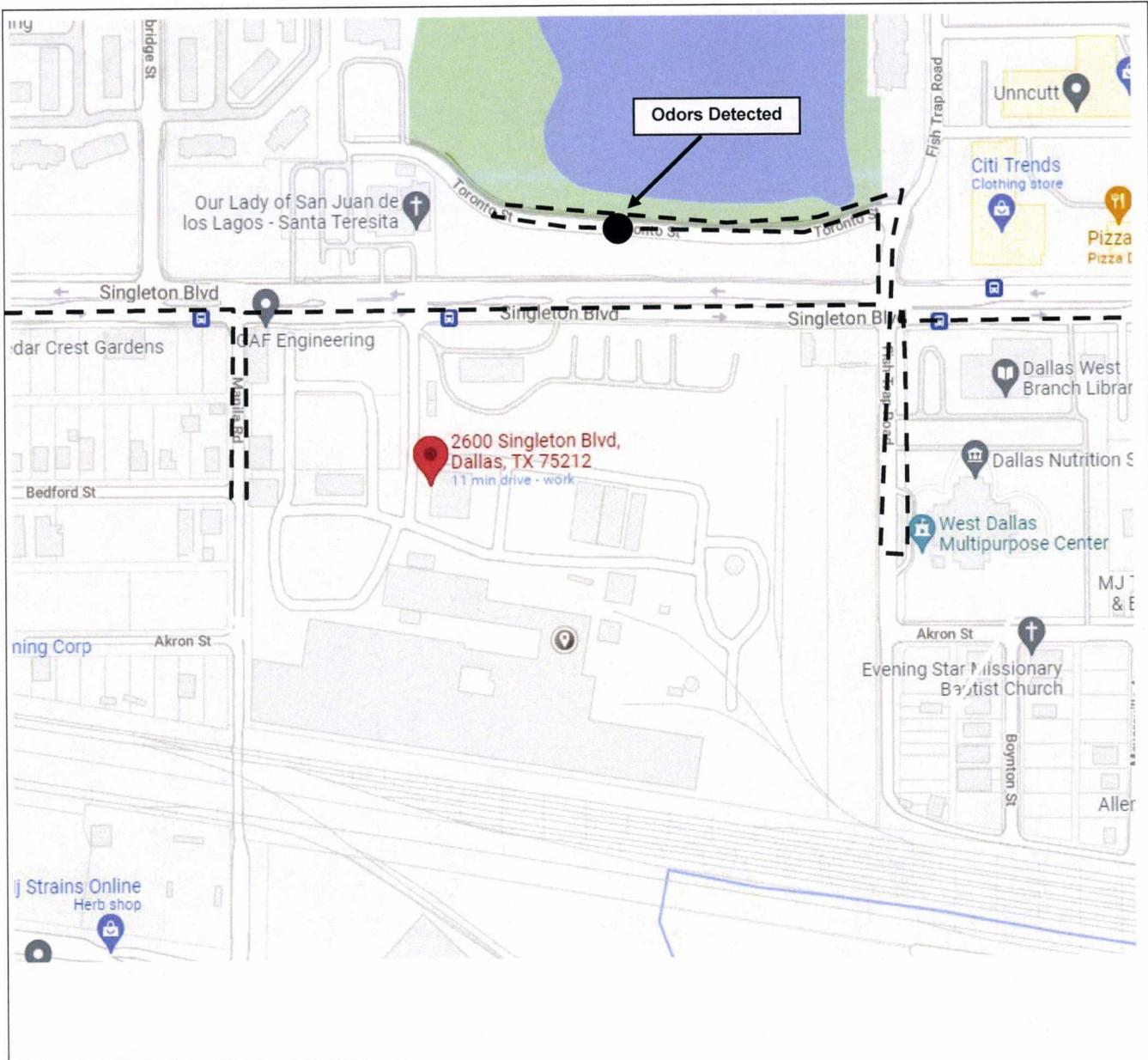
Attachment 1 Odor Survey Route Map
 City of Dallas Local Air Program
 Investigation 1796004
 GAF Materials
 2600 Singleton Boulevard
 Dallas, TX 75212



Legend
 Dashed Black Line – Survey Route
 02/09/2022
 1:10pm-1:55pm
 Winds at 6 mph NW
 No odors Detected



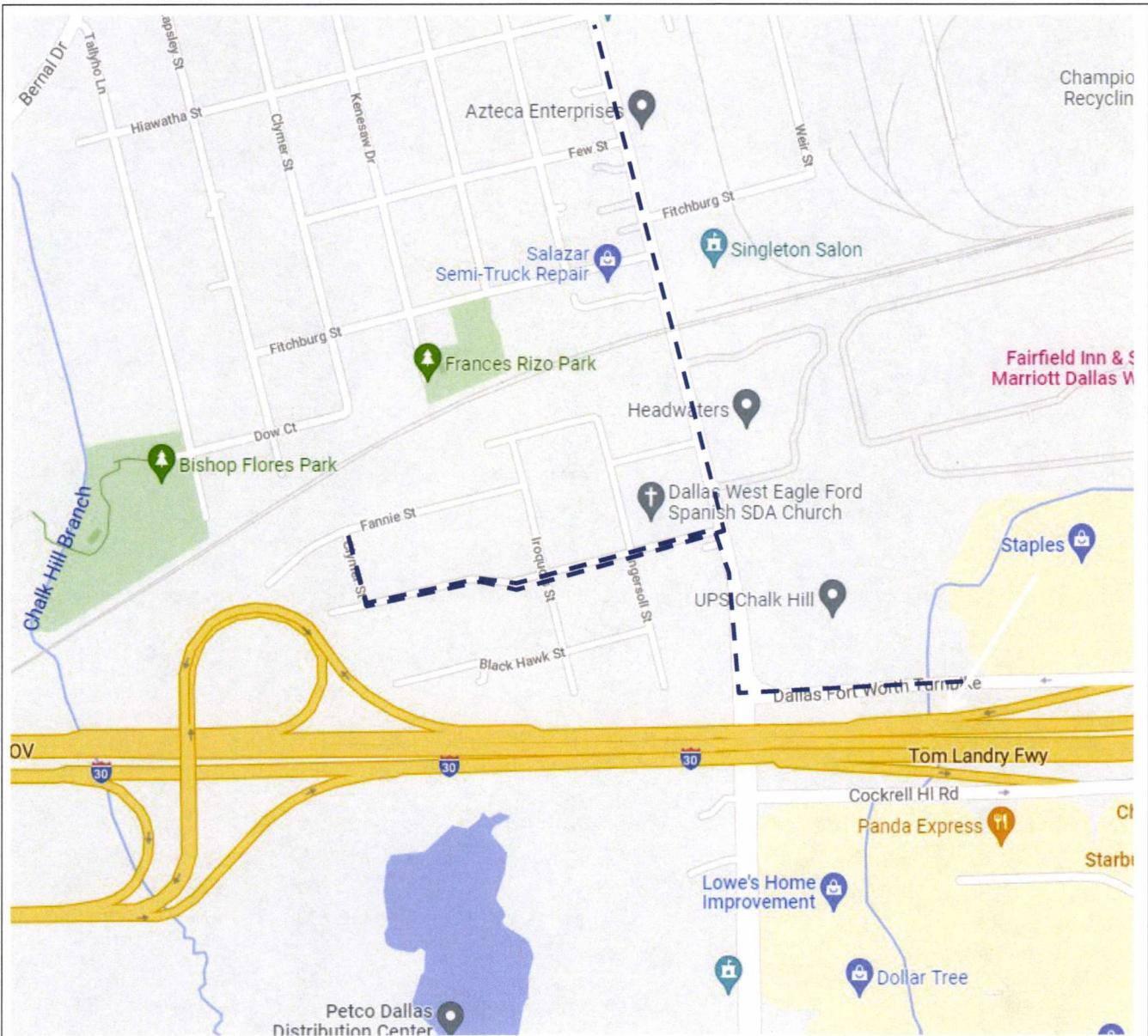
Attachment 1 Odor Survey Route Map
 City of Dallas Local Air Program
 Investigation 1796004
 GAF Materials
 2600 Singleton Boulevard
 Dallas, TX 75212



Legend
 Dashed Black Line – Survey Route
 02/14/2022
 1:55pm-3:25pm
 Winds at 12 mph SW



Attachment 1 Odor Survey Route Map
 City of Dallas Local Air Program
 Investigation 1796004
 GAF Materials
 2600 Singleton Boulevard
 Dallas, TX 75212



Legend
 Dashed Black Line – Survey Route
 02/14/2022
 1:55pm-3:25pm
 Winds at 12 mph SW
 No odors Detected



Attachment 1 Odor Survey Route Map
 City of Dallas Local Air Program
 Investigation 1796004
 GAF Materials
 2600 Singleton Boulevard
 Dallas, TX 75212

Inv 1796004

Attachment 2

TCEQ Exit Interview Form - Records Request

Total Pages 1

CN605251487

RN100788959

Building Materials Investment Corporation

GAF Materials

01/28/2022 - 02/14/2022

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	GAF Materials			TCEQ Add. ID No.	RN100788959		
Investigation Type	CMPI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Complaint/compliance Investigation		
	Regulated Entity Contact				Telephone No.	972 872 2325	Date Contacted
Title	Senior Environmental Manager			FAX #/Email address	[REDACTED]	FAX/Email date	02/10/2022

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation-report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type ¹	Rule Citation (if known)	Description of Issue
1	RR	30 TAC 116.115 (c)	General and Special Conditions. Specifically, The holders of permits, special permits, standard permits, and special exemptions shall comply with all special conditions contained in the permit document. Permit 7711A Condition 37(G) requires quarterly observations for visible emissions and/or opacity determinations. Dallas LAP is requesting records from July 2021 through February 8, 2022.
1	RR	N/A	General Records Request: Operational status during the days of January 26, 2021, February 2 nd through the 4 th of 2022.

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.			
Joseph Vu	02/10/2022	Mr. Kevin Bush (E-mail)	02/10/2022
Investigator Name (Signed & Printed) 	Date	Regulated Entity Representative Name (Signed & Printed)	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

Please contact the agency's public information officer with any requests, questions, or comments on access to records or information at 512-239-0800.

White Copy: Regulated Entity Representative Yellow Copy: TCEQ

(Note: use additional pages as necessary) Page 1 of 1

Inv 1796004

Attachment 3

Photographic Log

Total Pages 1 total

CN605251487

RN100788959

Building Materials Investment Corporation

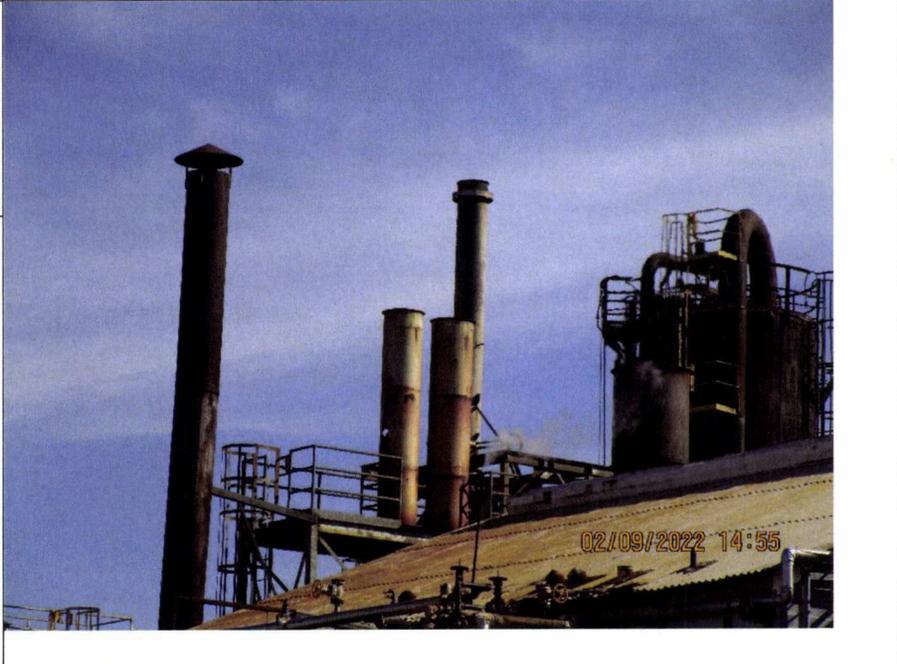
GAF Materials

01/28/2022 - 02/14/2022

Photographic Documentation

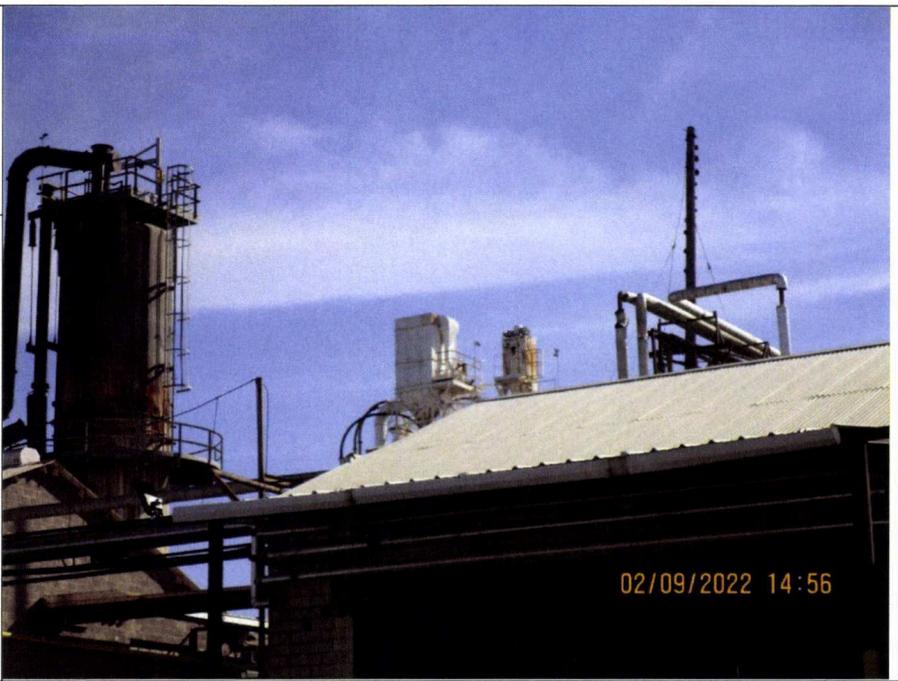
Complaint Investigation

Prepared by: Joseph Vu
Location: 2600 Singleton Blvd, Dallas, TX
Photograph Date: 02/09/2022

<p>Photograph No. 1</p> <p>Date: 02/09/2022</p> <p>Direction: Southeast</p>	
<p>Photograph No. 2</p> <p>Date: 02/09/2022</p> <p>Direction: Southeast</p>	

Photographic Documentation
Complaint Investigation

Prepared by: Joseph Vu
Location: 2600 Singleton Blvd, Dallas, TX
Photograph Date: 02/09/2022

<p>Photograph No. 3</p> <p>Date: 02/09/2022</p> <p>Direction: Southeast</p>	 <p>02/09/2022 14:56</p>
<p>Photograph No. 4</p> <p>Date: 02/09/2022</p> <p>Direction: East</p>	 <p>02/09/2022 14:58</p>

Photographic Documentation

Complaint Investigation

Prepared by: Joseph Vu

Location: 2600 Singleton Blvd, Dallas, TX

Photograph Date: 02/09/2022

<p>Photograph No. 5</p> <p>Date: 02/09/2022</p> <p>Direction: northeast</p>	 <p>A photograph showing a railcar unloading area. A long white railcar with 'GATX' branding is on the right. A steam vent is visible in the center. The area is enclosed with a metal fence. The ground is dirt and gravel. A timestamp '02/09/2022 14:59' is in the bottom right corner.</p>
<p>Photograph No. 6</p> <p>Date: 02/09/2022</p> <p>Direction: Northwest</p>	 <p>A photograph of an industrial facility, likely a refinery or chemical plant. It shows a complex network of pipes, valves, and structures. A large plume of white steam vapor is being expelled from a central stack. The sky is clear. A timestamp '02/09/2022 15:03' is in the bottom right corner.</p>



CITY OF DALLAS

March 25, 2022

Building Materials Investment Corps
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 January 28th, February 8th, 9th, and 14th of 2022, Mr. Joseph Vu with the City of Dallas Air Compliance Program conducted both a complaint and onsite investigation of the above-referenced facility to evaluate compliance with applicable requirements for air pollution. No violations were documented during the investigation.

The City of Dallas Air Compliance Program and Texas Commission on Environmental Quality (TCEQ) appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact me at 214-670-4059.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joseph Vu', with a long horizontal flourish extending to the right.

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