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Document Control Sheet

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Record Series Name:	OCE / Air Compliance
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Primary ID:	100788959
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Date:	8/18/2021 12:00AM
Title:	Investigation
Tertiary ID	1756357

## 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 #** 1756357

**Incident Numbers**

365647                      365256  
365503

**Investigator:** ADRIANNE JOHNSON

**Site Classification** MAJOR SOURCE

**Conducted:** 08/18/2021 -- 08/31/2021

**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):**

<b>Role</b>	<b>Name</b>
RESPONDENT	BUILDING MATERIALS INVESTMENT CORPORATION

RECEIVED

OCT 18 2021

**Contact(s):**

<b>Role</b>	<b>Title</b>	<b>Name</b>	<b>Phone</b>
REGULATED ENTITY MAIL CONTACT	SENIOR ENVIRONMENTAL ENGINEER	MR KEVIN BUSH	Cell (469) 337-4475 Phone (972) 872-2325
REGULATED ENTITY CONTACT	PLANT MANAGER	MR WAYNE SCOTT	Phone (214) 637-8964 Cell (917) 604-2264

TCEQ  
CENTRAL FILE ROOM

**Other Staff Member(s):**

<b>Role</b>	<b>Name</b>
QA Reviewer	JOSEPH VU
Supervisor	JOSEPH VU
Investigator	JOSEPH VU

**GAF MATERIALS - DALLAS**

**8/18/2021 to 8/31/2021 Inv. # - 1756357**

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**Associated Check List**

**Checklist Name**

AIR COMPLAINT INVESTIGATION

**Unit Name**

GAF

**Investigation Comments:**

On 08/18/2021,08/23/2021,08/26,2021 and 08/31/2021, Ms. Adrienne Johnson, Environmental Investigator for the Dallas Local Air Program, conducted an Air Quality Complaint (AIR-CMPL) in the general area of 2600 Singleton Blvd Dallas, Tx 75212. (Attachment 1).

The purpose of the investigation was to respond to the complaint by observing the site operations and 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 originating from 2600 Singleton Blvd Dallas, Tx 75212. This was an unannounced investigation because it was initiated by a complaint. The purpose of this investigation was to perform a survey to assess current nuisance conditions.

**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 365256,365503, and 365647 for more information.

**TIME, DATE, FREQUENCY, DURATION OF THE ODOR**

The complainants alleged burning smell of chemicals and plastic coming from the site on 2600 Singleton Blvd Dallas, Tx 75212.

**DESCRIBE ACTIVITY/OPERATIONS AT THE TIME OF THE COMPLAINT**

Near the location, a smell of burning chemicals and plastic.

**DESCRIPTION OF THE ALLEGED EFFECTS**

The complainants did not allege any effects.

**INVESTIGATION INFORMATION**

**METEOROLOGICAL DATA AT THE TIME OF THE INVESTIGATION**

1315 hrs. 08/18/2021 Temperature: 75 F , 94% humidity, east 3 mph winds, and rain  
0948 hrs. 08/23/2021 Temperature: 84 F, 65% humidity, south 7 mph winds, and sunny

1212 hrs. 08/25/2021 Temperature: 95°F , 45 % humidity, S southeast 5 mph winds, and sunny.

0620 hrs. 08/26/2021 Temperature: 81°F , 75 % humidity, S southwest 1 mph winds, and clear.

0919 hrs. 08/31/2021 Temperature: 84 F, 59 % humidity, S southwest 5 mph winds, and sunny

**LOCATION OF THE ACTIVITY**

2600 Singleton Blvd Dallas, Tx 75216, is the alleged source causing nuisance odor conditions.

**DESCRIPTION OF THE ACTIVITY**

An investigation was conducted to assess a nuisance odor complaint and observe if the alleged location was adhering to 30 TAC 101.4 General Rules for Nuisance Conditions.

**DESCRIPTION OF THE EFFECTS ON THE INVESTIGATOR**

No nuisance odor conditions were observed or detected. Therefore, the investigator did not experience any health impacts.

**SOURCE EMISSIONS CONSISTENT WITH THE ALLEGED ACTIVITY**

At time of investigation, no odors was observed coming from the alleged location.

## **GAF MATERIALS - DALLAS**

**8/18/2021 to 8/31/2021 Inv. # - 1756357**

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### **DESCRIBE ACTIVITY/OPERATIONS AT THE TIME OF THE INVESTIGATION**

On 08/26/2021, the investigator performed uphill and downhill observations along with driving surveillance. No odors were observed.

### **SPECIFIC CAUSE OF THE ODOR**

The source of the nuisance is allegedly coming from GAF Materials but no source has been confirmed.

### **COMPLAINANT LOG NECESSARY/ APPROPRIATE**

On 08/18/2021, a complainant alleged a chemical burning smell allegedly coming from GAF located at 2600 Singleton Blvd Dallas, Tx 75212. The alleged odor was most prominent by the library and facing the lake.

On 08/18/2021, Ms. Adrienne Johnson, environmental investigator arrived at 13:15 hours at the Dallas West Branch Library. Weather conditions: 75 F, 94% humidity, east 3 mph winds, and rain. The investigator walked to the corner of Fish Trap Rd and Singleton Blvd and noticed the railcars moving facing the back library. A slight odor came and went while the railcar was running. The investigator drove down Fish Trap Rd that turned into Muncie Ave, right beside the rail track but the railcar was already gone. At the corner of Boynton St and Muncie Ave, the investigator parked to try and assess the odor but the rain started pouring down. No violations were given, and the investigator left at 1:40 pm. The investigator will go back to the location soon for more surveillance. The map figure for the odor surveillance conducted on this day has been included. (Attachment 1)

On 08/23/2021, Ms. Adrienne Johnson, environmental investigator arrived at 9:48 hours near the side of GAF on Manila Rd and Bedford St. Weather conditions: 84 F, 65% humidity, south 7 mph winds, and sunny. The investigator called the complainant at 9:51 hours and a voicemail was left. The investigator walked along fence of GAF on Manila Rd and smelled odors of wood. Surveillance on foot continued along Singleton Blvd. in front of GAF entrance and no odors besides truck exhaust. On the side of the plant near the Dallas West Library, there are railcars and a black railcar or trailer was emitting smoke. Observation of smoke started at 10:16 hours to 10:31 hours and investigator could smell the odor of burning rubber. After the smoke disappears, the odor will stop briefly for 10 seconds but appeared again once the smoke started back. Pictures and videos were taken at the site and the investigator left at 10:45 hours. The investigator contacted the plant's Senior Environmental Engineer, Mr. Kevin Bush, and scheduled to take a tour this week to confirm the source. The map figure for the odor surveillance conducted on this day has been included. (Attachment 2)

On 08/26/2021, Ms. Adrienne Johnson and Mr. Joseph Vu, environmental investigators visited the complaint area at 8:40 hours. No nuisance odor conditions were detected. An onsite tour of the GAF Facility was conducted at 9:12 hours, no violations were documented as a result of the tour. Because the investigators could not confirm the alleged violation, no violations were issued. The map figures for the odor surveillance that Ms. Johnson and Mr. Vu conducted on this day has been included. (Attachment 3 and 4)

On 08/31/2021, Ms. Adrienne Johnson, environmental investigator, arrived at the alleged location at 9:19 hours. Weather conditions: 84 F, 59% humidity, S southwest 5 mph winds, and sunny. The investigator parked at Dallas West Branch Library and could smell a light odor of wood but no burning or rubber odors. The investigator drove and parked in front of the lake, facing the front of GAF next to the church, Our Lady of San Juan de los Lagos. The weather conditions: 88 F, 57% humidity, S southwest 5 mph, and sunny. No odors were observed, no violations were given, and the investigator left 9:48 hours. The map figure for the odor surveillance conducted on this day has been included. (Attachment 5)

### **Exit Interview:**

No nuisance conditions were observed or confirmed, and no violations were issued.

### **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

## GAF MATERIALS - DALLAS

8/18/2021 to 8/31/2021 Inv. # - 1756357

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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 and Performance Classification:

GAF Materials RN100788959 Classification: High - Rating 0.0

Building Materials Corporation of America CN605251487: Classification: High - Rating 0.0

Agreed Orders, Court Orders, and other Compliance Agreements:

No violations were issued during this investigation.

Prior Enforcement Issues:

No violations were issued during this investigation.

Complaints:

On 08/10/2021 a complaint was received by City of Dallas (Incident 365503). On 08/18/2021 and 08/25/2021 two additional complaints were received by City of Dallas (Incidents 365256 and 365647). Investigation 1756357 no violations were issued during the investigations. Within the last two years a total of five other complaints have been alleged against the facility (Incident #'s 297802, 340773, 350415, 362605, 362860) (Investigation 1746067). No violations were issued as a result of the previous complaint investigations.

### ADDITIONAL INFORMATION:

Conclusions, Recommendations and Current Enforcement Issues:

No violations were issued during the investigations. The facility will receive a General Compliance Letter

Additional Issues:

No additional issues were noted during this investigation.

Attachments:

1. Map Figure 08/18/2021
2. Map Figure 08/23/2021
3. Map Figure 08/26/2021
4. Map Figure 08/26/2021
5. Map Figure 08/31/2021

**No Violations Associated to this Investigation**

Signed Adrienne Johnson  
Environmental Investigator

Date 9/3/21

Signed [Signature]  
Supervisor

Date 9/3/21

**Attachments: (in order of final report submittal)**

Enforcement Action Request (EAR)

Letter to Facility (specify type) : BU

Investigation Report

Sample Analysis Results

Manifests

Notice of Registration

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) :

**List of Attached files**

Map\_Figure 08\_18\_2021.docx

Map\_Figure 08\_23\_2021.docx

Map\_Figure 08\_26\_2021 (1).docx

Map\_Figure 08\_26\_2021 (2).docx

Map\_Figure 08\_31\_2021.docx

Inv # 1756357

Attachment 1

Map Figure 08/18/2021

Total Pages (1 total)

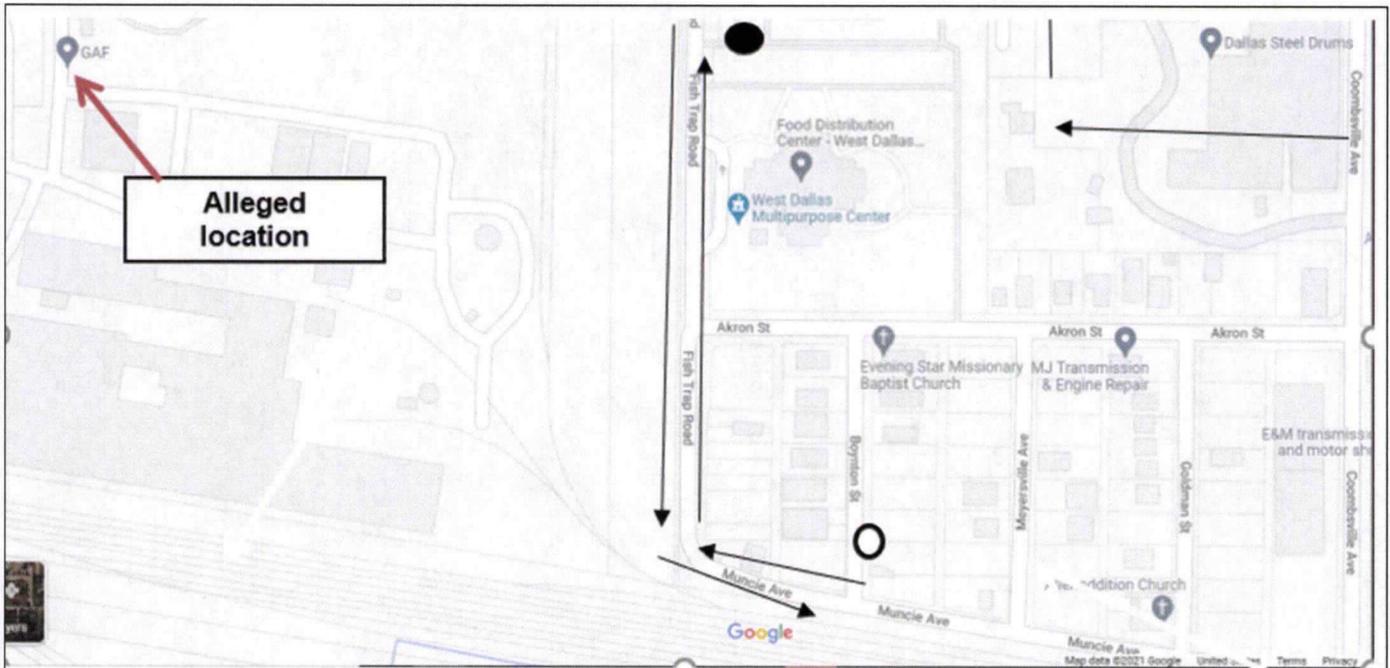
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

8/18/2021



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



**City of Dallas**



**Attachment 1 Map/Figure**  
 City of Dallas Local Air Program  
 Investigation 1756357  
 08/18/2021  
 City of Dallas City Hall  
 1500 Marilla Street 7AN,  
 Dallas, TX 75201

Inv # 1756357

Attachment 2

Map Figure 08/23/2021

Total Pages (1 total)

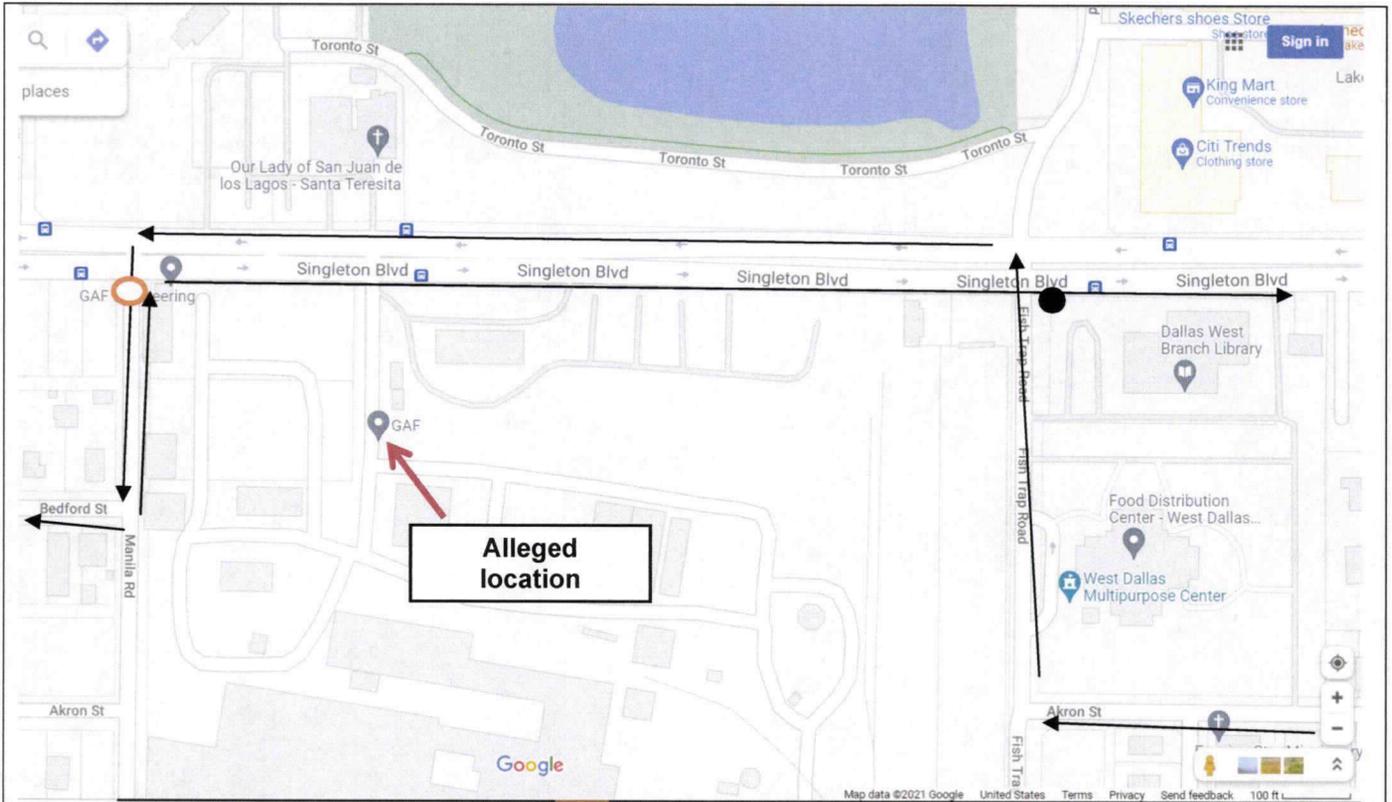
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

8/18/2021



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



**Attachment 2 Map/Figure**  
 City of Dallas Local Air Program  
 Investigation 1756357  
 08/23/2021  
 City of Dallas City Hall  
 1500 Marilla Street 7AN,  
 Dallas, TX 75201

Inv # 1756357

Attachment 3

Map Figure 08/26/2021 (1)

Total Pages (1 total)

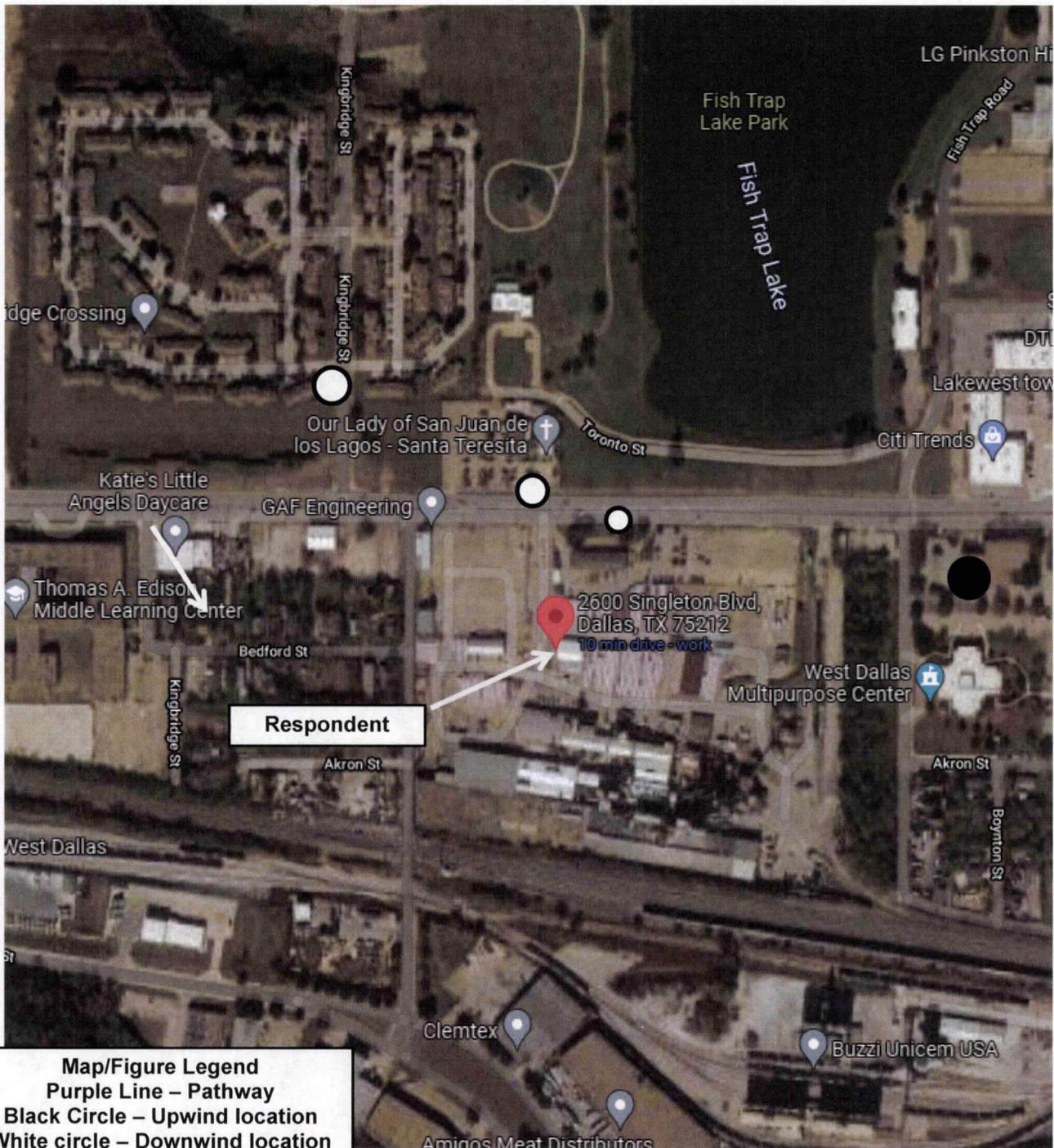
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

8/18/2021



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



**Map/Figure**  
 City of Dallas Local Air Program  
 Investigation 1756357  
 08/26/2021  
 2600 Singleton Blvd  
 Dallas, TX

Inv # 1756357

Attachment 4

Map Figure 08/26/2021 (2)

Total Pages (1 total)

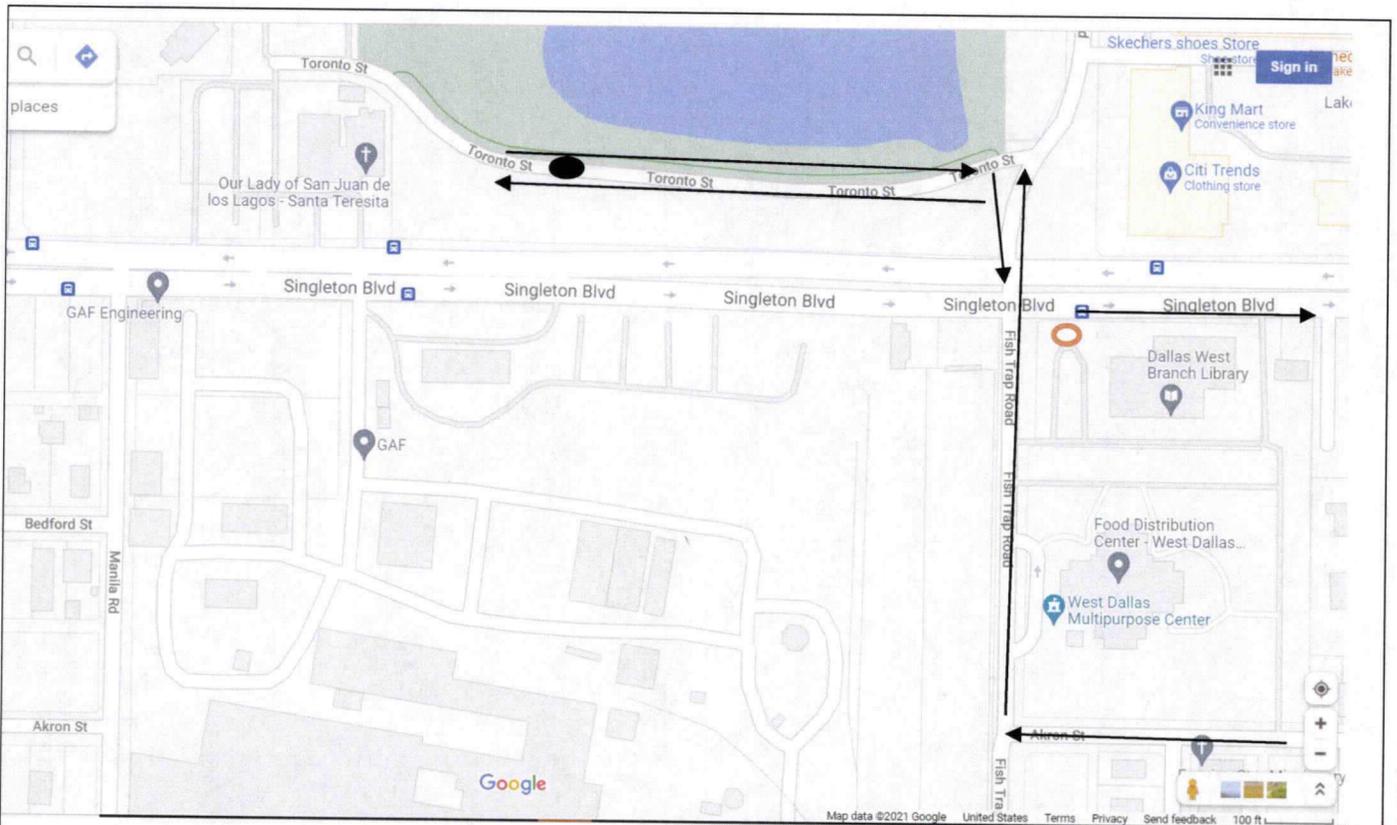
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

8/18/2021



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



**City of Dallas**



**Attachment 1 Map/Figure**  
 City of Dallas Local Air Program  
 Investigation 1756357  
 City of Dallas City Hall  
 1500 Marilla Street 7AN,  
 Dallas, TX 75201

Inv # 1756357

Attachment 5

Map Figure 08/31/2021

Total Pages (1 total)

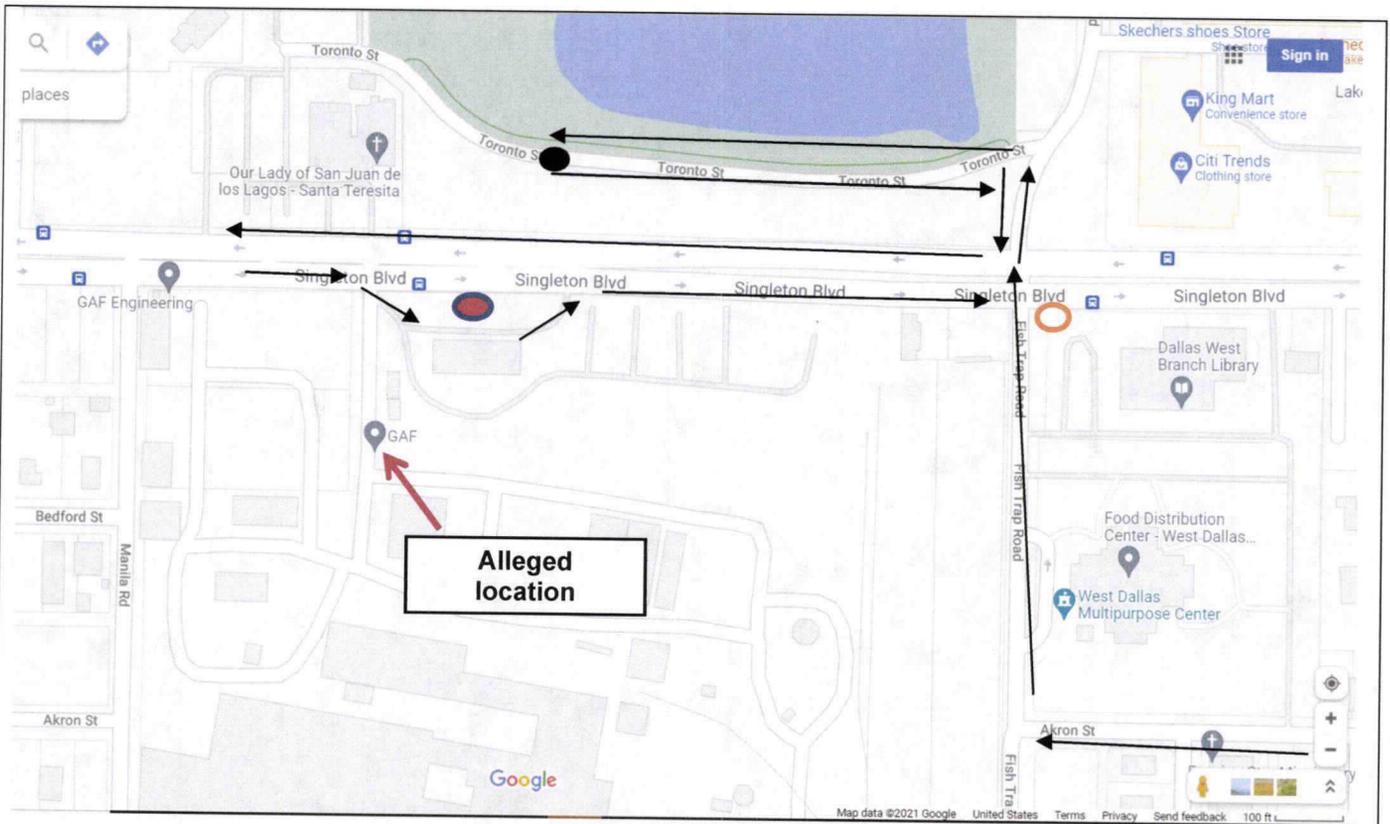
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

8/18/2021



**Map/Figure Legend**  
**Black arrow – Pathway**  
**Black circle – Upwind location**  
**White circle – Downwind location**  
**Red circle – Onsite location**



**Attachment 2 Map/Figure**  
 City of Dallas Local Air Program  
 Investigation 1756357  
 08/31/2021  
 City of Dallas City Hall  
 1500 Marilla Street 7AN,  
 Dallas, TX 75201



**CITY OF DALLAS**

September 3, 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 August 18<sup>th</sup>, 23<sup>rd</sup>, 26<sup>th</sup> and 31<sup>st</sup> of 2021, Ms. Adrienne Johnson 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 Ms. Johnson at 214-671-5239.

Sincerely,

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

## Summary of Investigation Findings

**SCHEPPS DAIRY**

3114 S HASKELL AVE  
DALLAS, DALLAS COUNTY, TX 75223

Additional ID(s): 84023  
DB0712F

Investigation #  
1755030  
Investigation Date: 07/30/2021

### OUTSTANDING ALLEGED VIOLATION(S)

Track No: 782527 Compliance Due Date: 07/16/2021

30 TAC Chapter 101.4  
5C THSC Chapter 382.085(b)

**Alleged Violation:**

Investigation: 1739094

Comment Date: 07/08/2021

Failure to control the discharge of air contaminants, that have in such concentration and such duration, have adversely impacted and interfered with the human welfare and the normal use and enjoyment of property. Specifically, "nuisance odor" conditions were observed along the northern boundary of the property when Mr. James Thomas, Plant Engineer of this Schepps Dairy Facility, performed a site walkthrough on 06/25/2021. He identified the source of the "nuisance odors," which he described as characteristic of "dead animals" and "wastewater odors," as three semi-truck trailers filled with "used" milk crates. These "used" milk crates were covered in milk product residues, which had been actively degrading for a period of several weeks, producing the odors as bacterial degradation by-products. These odors were travelling offsite and negatively impacting neighboring properties.

Investigation: 1755030

Comment Date: 09/01/2021

Failure to control the discharge of air contaminants, that have in such concentration and such duration, have adversely impacted and interfered with the human welfare and the normal use and enjoyment of property. On 07/16/2021, Mr. James Thomas, Plant Engineer at this Schepps facility, emailed the investigator a list of corrective measures that had been enacted to abate the odors and to bring them back into compliance. From 07/30/2021 - 08/24/2021, Mr. Taylor Kubic, the City of Dallas investigator, and Mr. Joseph Vu, Manager of the City of Dallas Local Air Program, conducted an air onsite follow-up investigation (AIRFIOS) to determine if Schepps facility had met all the requirements to resolve the "nuisance odors" violation. This investigation consisted of a brief walkthrough of the Schepps property on 08/10/2021 to visually confirm that the listed corrective measures were in place, and it also included seven follow up odor surveys to determine if the "nuisance odor conditions" were persisting offsite at the complainants' properties. This onsite follow up investigation determined that "nuisance odor conditions" continued to persist beyond the implementation of the corrective measures submitted by Schepps on 07/16/2021 and that all the requirements to resolve the "nuisance odors" violations had not been met. According to the TCEQ's EIC, this violation is now designated as a "Continuous Category B" violation, which warrants formal enforcement proceedings. Consequently, on 08/25/2021, Mr. Joseph Vu emailed the Schepps contacts an Exit Interview Form detailing the escalation of this violation to the TCEQ Enforcement Division for formal enforcement proceedings.

**Recommended Corrective Action:** Enact measures to control/minimize the problematic odors in such a way that they are not classified as "nuisance odors," according to the definition of "nuisance odors," codified in 30 TAC 101.4