

Document Control Sheet

Sheet Title:	AIR CP - OLS
Box ID:	22334
Control Sheet ID:	0000-0000-0054-4784
Record Series Name:	OCE / Air Compliance
Record Series:	AIR CP
Primary ID:	100788959
Secondary ID:	
Doc Type:	Compliance
Security:	Public
Date:	11/8/2021 12:00AM
Title:	Investigation
Tertiary ID	1774604

AIR CP_100788959_CP_20211108_Investigation_1774604_
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 # 1774604

Incident Numbers

369802

Investigator: ADRIANNE JOHNSON

Site Classification

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

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):

Role

Name

RESPONDENT

BUILDING MATERIALS INVESTMENT CORPORATION

Contact(s):

Role

Title

Name

Phone

REGULATED
ENTITY
CONTACT

PLANT MANAGER

MR WAYNE SCOTT

Cell (917) 604-2264
Phone (214) 637-8964

REGULATED
ENTITY MAIL
CONTACT

SR ENVIRONMENTAL
ENGINEER

MR KEVIN BUSH

Cell (469) 337-4475
Phone (972) 872-2325

Other Staff Member(s):

Role

Name

QA Reviewer
Supervisor

JOSEPH VU
JOSEPH VU

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DEC 21 2021

TCEQ
CENTRAL FILE ROOM

Associated Check List

Checklist Name

AIR COMPLAINT INVESTIGATION

Unit Name

GAF Materials

GAF MATERIALS - DALLAS

11/8/2021 to 11/18/2021 Inv. # - 1774604

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Investigation Comments:

INTRODUCTION

On 11/08/2021, 11/10/2021, 11/15/2021, and 11/18/2021 Ms. Adrienne 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 complainant to gather additional information. The complainant alleges strong odors hit them when they step out of their home onto their porch after being indoors for hours overnight. 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

The complainant was on their residential property's porch.

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.

GAF MATERIALS - DALLAS

11/8/2021 to 11/18/2021 Inv. # - 1774604

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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. Adrienne 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, the odors hit them when they step out of their home onto their porch. 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

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11/8/2021 to 11/18/2021 Inv. # - 1774604

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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

GAF MATERIALS - DALLAS

11/8/2021 to 11/18/2021 Inv. # - 1774604

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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

Adrienne Johnson
Environmental Investigator

Date 11/29/2021

Signed

[Signature]
Supervisor

Date 11/29/21

Attachments: (in order of final report submittal)

Enforcement Action Request (EAR)

Letter to Facility (specify type) : 600

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)

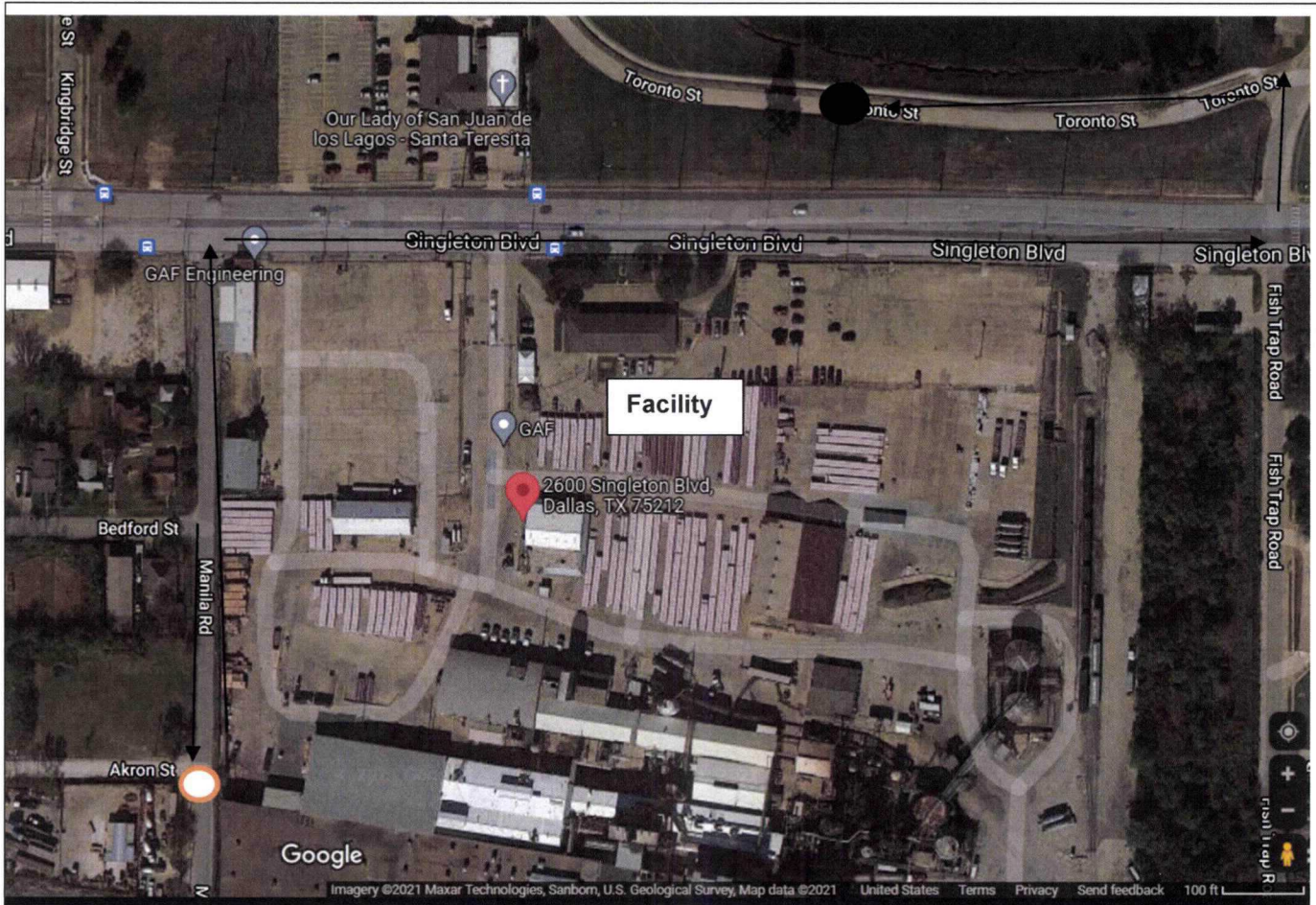
CN # 605251487

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.



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)

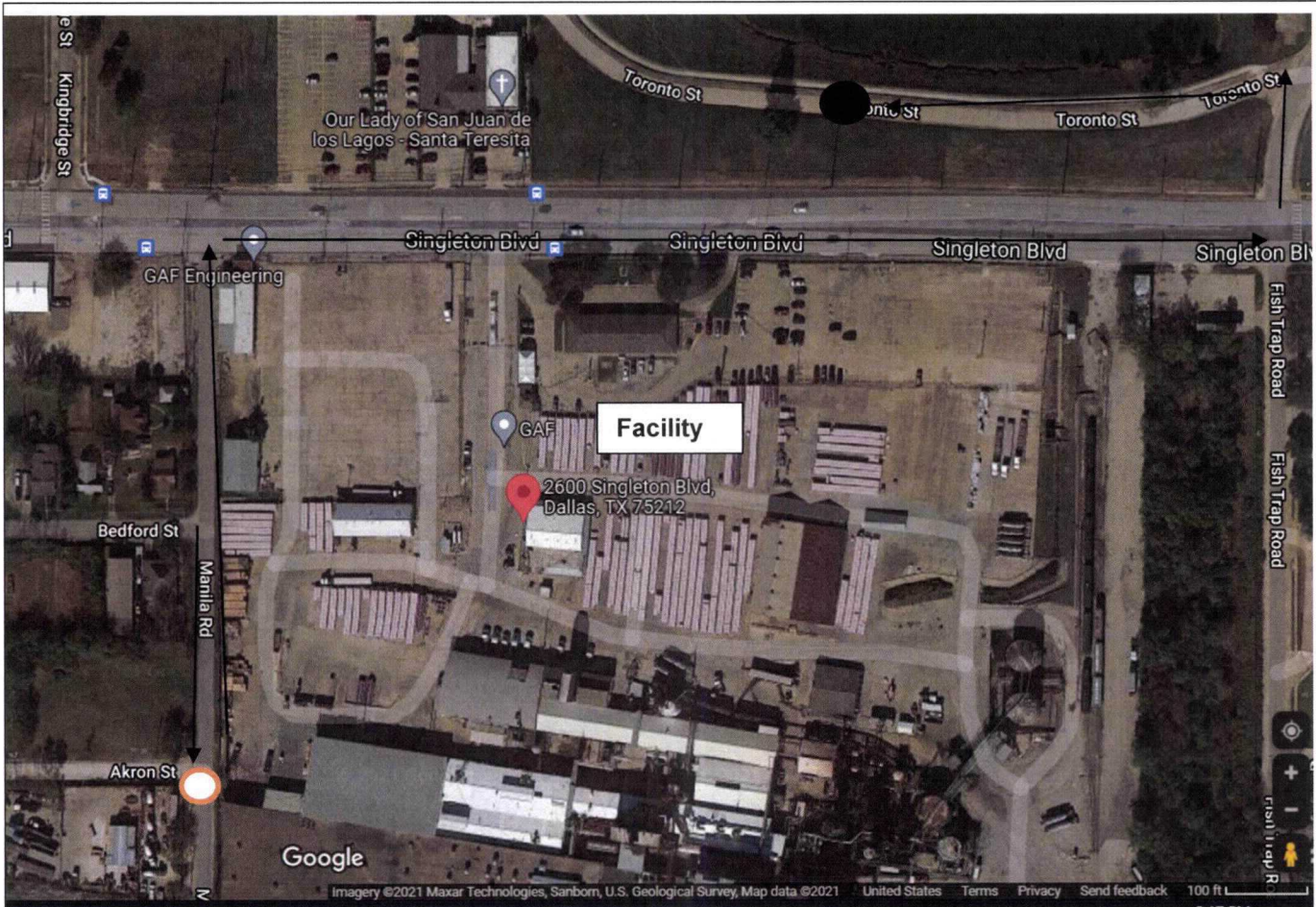
CN # 605251487

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.



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)

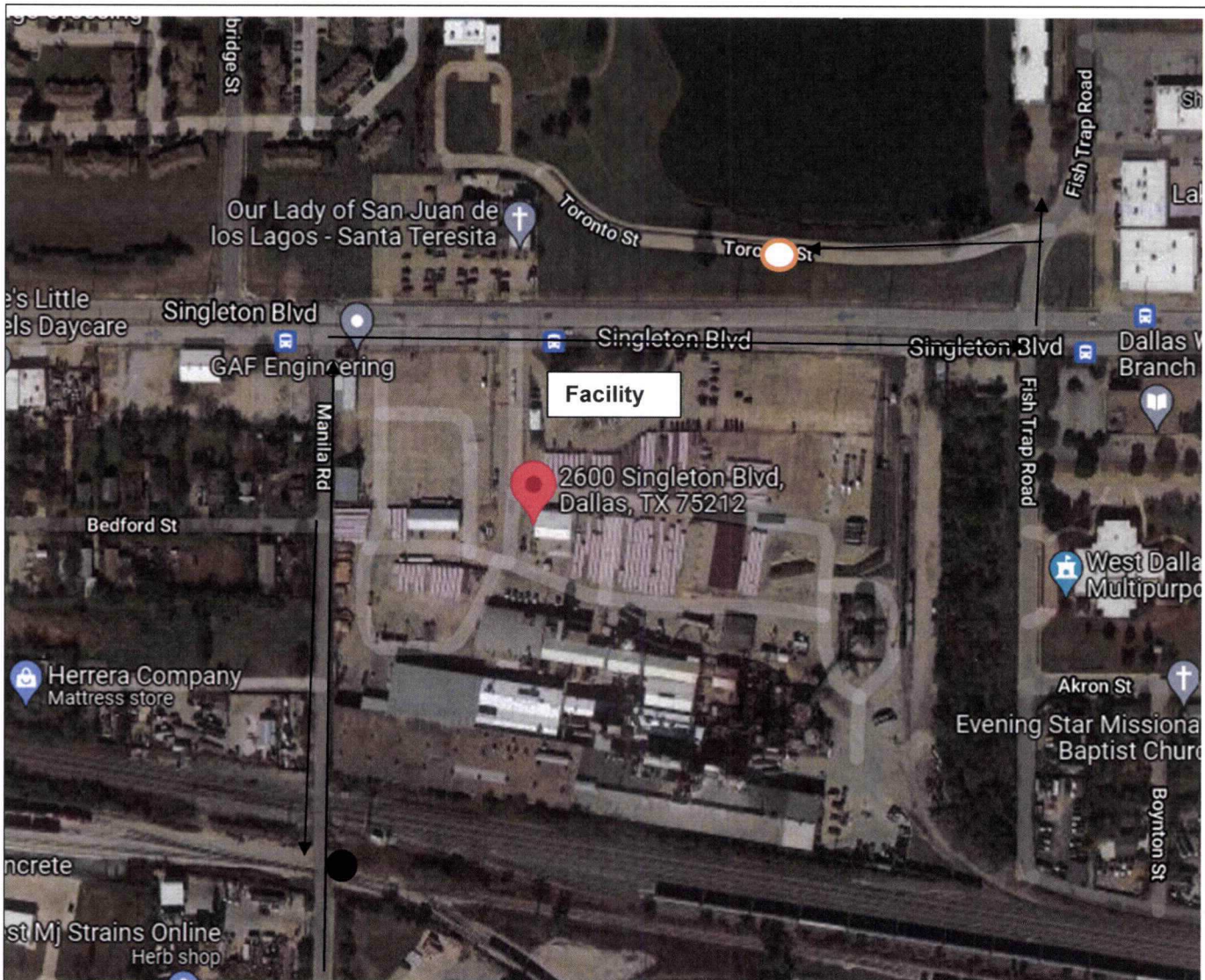
CN # 605251487

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.



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

Inv # 1774604

Attachment 5

Compliance History

Total Pages (2 total)

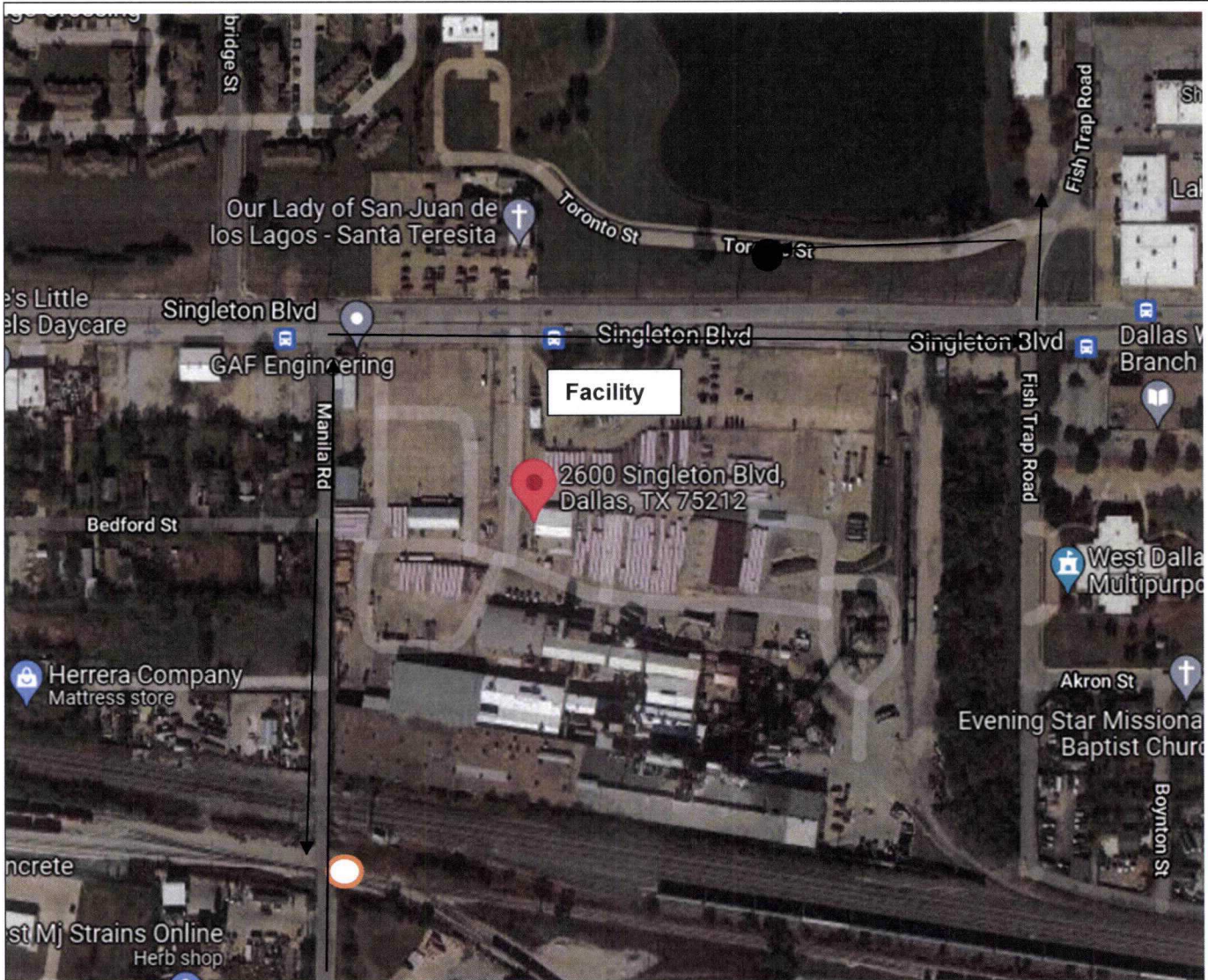
CN # 605251487

RN #100788959

Building Materials Corporation of America (CN)

GAF Materials (RN)

11/8/2021



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



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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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

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) (CEDS 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.

* NOV's 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



CITY OF DALLAS

December 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 November 08, 10, 15 and 18 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