

D Magazine Inquiry Response

Have you taken any steps to mitigate air pollution in that neighborhood, and if so, when and what?

All of the risks alleged by the neighborhood have been addressed by EPA regulations established based on requirements in the Clean Air Act (CAA). The CAA regulatory framework is built on over 70 years of legislation, litigation, research, science, and technological advancements. The CAA regulatory framework includes mechanisms to ensure that the regulations evolve with advancements in science and technology. These regulations were specifically designed to mitigate the types of risks the neighborhood is alleging. The neighborhood highlights the risks associated with various pollutants while completely ignoring the fact that GAF complies with regulations specifically designed to address those risks.

GAF takes compliance very seriously, complying with requirements in the facility's Federal Operating Permit, underlying construction authorizations, and applicable state/federal air regulations.

GAF utilizes state-of-the-industry air pollution controls, continuous parameter monitoring, inspections, preventative maintenance, and other work practices to minimize emissions as required by the Federal Operating Permit and state and federal regulations, including nuisance emission and odor provisions.

GAF's air pollution controls are considered the Best Available Control Technology under the permit. And, even though it is not required, it also meets the higher standard, Maximum Achievable Control Technology, for its pollution controls.

The neighborhood is apparently launching a campaign to get the city of Dallas to consider amortization. Does GAF have any comment on that?

GAF's West Dallas facility, which employs more than 140 individuals working union (United Steel Workers) and non-union jobs and produces enough roofing material to protect the homes of more than 400 families each day, has operated safely and in compliance with our permit requirements for more than 75 years.

While it is unfortunate that a select group claims to be pursuing amortization with the city, GAF fully intends to challenge any action and address any misconceptions or inaccuracies regarding our plant. GAF stands committed to our West Dallas employees and the work they are doing to safely and effectively meet our customers' needs.

Does GAF want to rebut any of the claims made within the case for amortization developed by these community groups?

GAF Emissions

Unfortunately, the Singleton United/Unidos information mischaracterizes the emissions from GAF. GAF was issued a state and federal air permit for air emissions and GAF is in complete compliance with that permit. Before that permit was issued, the state determined that the levels of emissions permitted from the GAF facility were safe for the West Dallas community and complied with the National Ambient Air Quality Standards (NAAQS). The TCEQ determined 106 tons per year of PM emissions were safe for residents living at the fence line of our West Dallas facility. The West Dallas plant emits less than 30 tons per year - less than a third of our permit limit.

Monitoring Systems

The EPA and the TCEQ deploy advanced monitoring systems in the community to make regulatory decisions, including for use in NAAQS area designations. The EPA has designated Dallas County as being in attainment with the NAAQS for particulates and sulfur dioxide. Their monitoring stations observe air quality impacts from a variety of sources, including but not limited to roadway traffic, lawn maintenance activities, construction, smoke from wildfires from other states, pollen, etc. Industrial activities are only one component of observations made at ambient air quality monitoring stations.

The air quality monitors placed by citizens near the GAF facility are PurpleAir monitors, which are affordable and easy to use, but not very accurate. The [EPA has stated PurpleAir monitors overestimate PM2.5 concentrations by up to 40-60%](#). Additionally, these monitors are unable to distinguish between harmless water particles and true particulate matter, so they are especially unreliable in humid regions like Dallas, and frequently show high readings on humid days, in fog or when dew points are reached.

Placement of any individual sensor can bias the data up or down so it is not appropriate to perform a one data point comparison. For example, sensor placement in a sheltered area protected from wind can decrease recorded PM values, while a placement near ground level or near roadways can bias an individual sensor high. Similarly, short term daily activity in the location of an individual sensor can tamper with observations such as construction work, clean street sweepers or lawn mowing.

Hazardous Materials

Despite what is stated in the community's report, our raw materials are very common building products of asphalt, sand and rock granules. These are among the most common building products in the U.S. and are on 75% of the roofs in America. These groups mischaracterize our West Dallas operations as handling hazardous waste and having a risk of catastrophic explosion, all of which are untrue. If an accidental spill of sand occurs, no resident is at risk. If an accidental spill of heated asphalt occurs, it would harden at ambient air temperatures and solidify - essentially becoming accidental paving.

Nuisance Complaints

The West Dallas facility is a well-run plant in full compliance with emission limits. The GAF facility has had over a dozen odor inspections by City personnel in response to neighborhood

complaints this year and every time no offensive odor is observed, and many times the plant was not operating on the day of the complaint. Singleton United/Unidos also alleges visible emissions occur from the plant, we have similarly had several City inspections in response to these complaints, in every single case the visible emissions were pure water steam from our heating system which is 100% legal and safe.