



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Mr. Tony Kilgore
Corporate Environmental Manager
Tamko Building Products
2300 35th Street
Tuscaloosa, AL 35401
tony_kilgore@tamko.com

Dear Mr. Kilgore:

On July 27 and 28, 2021, the Environmental Protection Agency, Region 4 along with the National Environmental Investigations Center (NEIC) conducted Geospatial Measurement of Air Pollution (GMAP) monitoring at Tamko Building Products located in Tuscaloosa, Alabama. Enclosed is the final report generated by Region 4 for this activity (Enclosure). The results of the GMAP monitoring by NEIC will follow at a later date. All comments have been addressed and further clarification is as follows:

- Comment 5 – This section has been revised to reflect the regulatory name of 40 CFR Part 63.
- Comment 8 – The results of the GMAP monitoring and sampling, which was conducted by NEIC, will be provided as a supplement to Region 4's inspection report at a later date.
- Comment 9 – These sections are part of a generic report template and are documented as Not Applicable (N/A).
- Comment 11 – This section is revised to indicate a high reading, which is why the GMAP returned the next day. Results of NEIC's GMAP monitoring will be provided as a supplement to this report at a later date.

If you have any questions, please contact me at (404) 562-9206, or by email at Hughes-Fairley.Rosalyn@epa.gov.

Sincerely,

ROSALYN
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Rosalyn Hughes Fairley
Environmental Engineer
South Air Enforcement Section

Enclosure

**ENCLOSURE
INSPECTION REPORT**

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: Tamko Building Products

Location (Address): 2300 35th Street, Tuscaloosa, AL 35401

Inspection Date: July 27, 2021 – July 28, 2021

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

ICIS-Air Number: AL0000000112500017

EPA Region 4 Investigator(s)/Inspector(s):
Rosalyn Hughes Fairley, Environmental Engineer

EPA National Enforcement Investigations Center (NEIC) Investigator(s)/Inspector(s):
Richard Helmich, Chemist

**EPA Office of Enforcement and Compliance Assurance (OECA)
Investigator(s)/Inspector(s):**
Nicholas Bobbs, Environmental Engineer

State/Local Investigator(s)/Inspector(s):
Chrystal Strickland, Alabama Department of Environmental Management

Person(s) Contacted at Facility (Name and Title):

1. Tony Kilgore, Corporate Environmental Manager
2. Steve Griffith, Plant Engineer
3. Shyla Blackketter Dwyer, Assistant Director, EHS
4. Mark Tucker, Plant Environmental Engineer
5. Jeremy Baer, Assistant General Manager
6. Justin Allen, General Manufacturing Manager

Report Prepared by: Rosalyn Hughes Fairley

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Roofing, Building Products
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Title V
3. Air permit issuance date.	December 17, 2019
4. Air permit expiration date.	December 16, 2024
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	VOCs, PM, SO ₂ , NO _x ,
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	NSPS, 40 CFR Part 60, Subparts Dc; K; UU; OOO; IIII; JJJJ NESHAP, 40 CFR Part 63, Subparts AAAAAAA Title V
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Tanks, Boilers, Roofing lines, Raymond Mills, Blowstills, Coating Heaters
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Baghouses, Thermal Oxidizers

B. Process Description

The TAMKO Tuscaloosa asphalt roofing plant manufactures roofing products. Asphalt is processed in the facility's refinery area through the oxidation of raw materials by blowing air

through it at elevated temperatures. The asphalt processed at the facility is primarily used in the facility's roofing manufacture process and may occasionally be sent off site to other TAMKO facilities. The residence time in the reaction vessels referred to as "blowstills" depends on the desired properties of the processed asphalt, such as softening point and penetration rate. The facility has five processing areas: the Refinery, the Raymond Mills, a line capable of producing laminate and 3 tab shingles; a laminate shingle production line; and saturated felt production line.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	July 27, 2021 at approximately 4:04 pm CST July 28, 2021 at approximately 8:20 am CST
2. Credentials presented to facility personnel (include name and title).	Y	Credentials were presented at the security gate and to Tony Kilgore and Steve Griffith upon entry at the main building.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	At the opening conference, NEIC explained the purpose of the Geospatial Measurement of Air Pollution (GMAP) vehicle. The GMAP would be used for surveying the facility site.
4. Discussed safety issues.	Y	Inspectors discussed Facility-specific safety and emergency procedures, including procedures for COVID-19 safety during the inspection.
5. Discussed which records to be reviewed.	Y	No records were reviewed

Activity	Yes No NA	Comments
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	NEIC explained that the vehicle planned to stay on the main facility roads and did not anticipate going into the process area with the vehicle. If there were readings that required additional information, such as confirmation and the location of emissions, an infrared camera would be used by the EPA inspectors. The survey would cover the facility including the landfill.
7. Discussed facility policy regarding photographs or video (if applicable).	Y	Inspectors indicated that videos may be taken with the infrared camera and that copies of the video would be sent to the company.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	Y	The NEIC explained the use and capabilities of the GMAP vehicle and the infrared camera. The use of Summa canisters was also noted as a possibility with the GMAP.
9. Discussed CBI.	Y	EPA inspectors indicated that any documents claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed, and the time period reviewed.	N	There were no records reviewed at the facility.
Facility Walk-Through Observations		

Activity	Yes No NA	Comments
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N/A	This was a facility survey conducted using the GMAP vehicle and supplemented with the use of an infrared camera. This was not a process-based inspection.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	Y	The infrared camera was used by NEIC and the video log and videos will be provided as a supplement to this report at a later date.
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	

Activity	Yes No NA	Comments
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	
Closing Meeting		
28. Conducted a closing meeting.	Y	A rainstorm occurred on July 27, 2021, while conducting the GMAP survey. A brief meeting was conducted to arrange returning on July 28, 2021, to complete the survey. The closing meeting was conducted on July 28, 2021, at 9:30 am CST. The closing meeting was conducted with all the EPA inspector participants, the ADEM participant, and Tony Kilgore, Steven Griffith, Justin Allen, Jeremy Baer, Mark Tucker and Shyla Blackketter Dwyer.
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	N/A	

Activity	Yes No NA	Comments
31. Discussed observations.	Y	Day 1 observations - NEIC summarized what was done with the GMAP vehicle. High readings of VOCs were noted and due to the storm, the team asked to come back the next morning to complete the survey. Day 2 observations – No high VOC readings were noted. Emissions were seen with the FLIR camera and the videos will be made available as a supplement to this report at a later date.
32. Discussed next steps, if applicable?	Y	
33. Date and time inspection concluded.		The inspection concluded on July 28, 2021 at approximately 9:50 am CDT
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature: _____

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EPA Supervisor Signature & Title: _____

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____ Chief, South Air Enforcement Section _____

Date Report Finalized: _____