

Semi-annual Compliance Report

Form 2

Use this form when a deviation occurred during the reporting period

Regulation 1138 – Section 16

Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

Submittal Date: The normal reporting periods are January 1 – June 30 and July 1 – December 31.
The semi-annual compliance report must be submitted no later than 31 days following the end of the reporting period.

[1] **Name of the facility:** Roofs 'R Us, Inc

[2] **Physical location – Street Address:** 219 Duncan Road
City, State, Zip Code : Marshallton, DE 19808

[3] **Name of Owner or Operator:** Benjamin A. West

[4] **Identify the reporting period covered by this semi-annual compliance report.**

Circle the appropriate dates

• Beginning date of the reporting period	<u>January 1</u>	<u>July 1</u>	<u>2011</u>
• Ending date of the reporting period	<u>June 30</u>	<u>December 31</u>	<u>YEAR</u>

[5] **Identify whether there were any periods during which any continuous parameter monitoring system (CPMS) was out-of-control, as specified in 3.8.3.7 of this regulation.**

Check appropriate box below

<input type="checkbox"/>
<input checked="" type="checkbox"/>

There were **no periods** during which any of the CPMS were out-of-control during the reporting period.

Yes, there were periods during which the CPMS were out-of-control during the reporting period.

[6] **Identify whether control devices or process conditions are employed to comply with the emission limitations of Section 16 of Regulation 1138 by completing Item 6 on Page 2 of this report form (Form 2).**

[7] **Identify and describe any changes made to the control devices or continuous parameter monitoring systems during the reporting period.**

There were no changes to the control devices or CPMS during the reporting period.

[8] **I certify that all the statements and information contained in this report are true, accurate, and complete.**

Printed Name: Benjamin A. West

Title/Position: Plant Manager

Telephone No: 302-555-2083

Email Address: bawest@roofsrus.com

Signature: *Benjamin A. West*

Date: July 28, 2011

[9] **Date of this report:** July 28, 2011

[10] **The owner or operator must submit this "Semi-annual Compliance Report" form to the following agencies by the submittal date provided above on this form. Remember to keep a copy of this report.**

Delaware Department of Natural Resources
and Environmental Control
Director of Air Quality
Blue Hen Corporate Mall
655 S. Bay Road, Suite 5N
Dover, DE 19901

U. S. Environmental Protection Agency
Director, Air Protection Division
1650 Arch Street
Philadelphia, PA 19103

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Regulation 1138 – Section 16

Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

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[6] Identify whether a control devices or process operating conditions are being used to comply with the emission limitations of Section 16 of Regulation for each emission point.

Asphalt processing emission points	Type of operation	Check appropriate box				If a control device is not used, identify the site-specific process parameter(s) being monitored to demonstrate compliance.
		Is a control device used?				
AP emission point #1 SK-22	Blowing still	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	
AP emission point #2	Blowing still	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	
AP emission point #3	Blowing still	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	

Asphalt roofing products manufacturing emission points	Type of ^A operation	Check appropriate box				If a control device is not used, identify the site-specific process parameter(s) being monitored to demonstrate compliance.
		Is a control device used?				
RP emission point #1 SK-28	C	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	
RP emission point #2		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	
RP emission point #3		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	
RP emission point #4		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	
RP emission point #5		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	

Note A: Indicate the type of operation with “C” (coater only), “S” (saturator only) or “CS” (combined saturator & coater)

Semi-annual Compliance Report

Form 2.1

Regulation 1138 – Section 16

Summary Report

Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

Name of the facility: Roofs 'R Us, Inc

[1] Describe the duration of all deviations occurring during the reporting period in terms to the total operation time.

• Provide the number of deviations that occurred during the reporting period :	Number:	One
• Provide the overall duration of all of the deviations that occurred during the reporting period (hours) :	Total deviation time, hours:	6 hours
• Provide the total number of hours that the processes were operating during the reporting period (hours) :	Total operating time, hours:	1040 hours
• Calculate and provide the percentage of the total deviation time to the total operating time during the reporting period (%) :	Deviations as percent of operating time, %:	0.6%

[2] Breakdown the duration of all deviations occurring during the reporting period in terms of the cause of the deviation.

Calculate and provide the total duration of all deviations, hours

• Startup problem deviation time, hours	
• Shutdown problem deviation time, hours	
• Control device problem deviation time, hours	6.0
• Process problem deviation time, hours	
• Other known cause deviation time, hours	
• Unknown cause deviation time, hours	
• Total deviation time, hours	6.0

[3] Describe the duration of the continuous parameter monitoring system (CPMS) downtime during the reporting period in terms to the total operation time.

• Provide the number of CPMS inoperative events that occurred during the reporting period :	Number:	One
• Provide the overall duration of all of the CPMS inoperative events that occurred during the reporting period (hours) :	Total CPMS inoperative time, hours:	5.0 hours
• Provide the total number of hours that the processes were operating during the reporting period (hours) :	Total operating time, hours:	1040 hours
• Calculate and provide the percentage of the total time the CPMS was inoperative to the total operating time during the reporting period (%) :	CPMS Inoperability as percent of operating time, %:	0.5%

Semi-annual Compliance Report

Form 2.2

Regulation 1138 – Section 16

Deviation Report

Emission Standards for Area Source Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

Name of the facility: Roofs 'R Us, Inc

[1] Describe the nature of the deviation.

- Identify the deviation: Natural gas is used to provide heat to various pieces of process equipment at the facility, including the thermal oxidizer (TO-1). On June 10, the facility lost its natural gas supply, due to an off-site construction accident. Due to this loss of the natural gas, the facility went into a staged shutdown between 1000 and 1600 hours. During this period, the 3-hour average combustion zone temperature for the thermal oxidizer fell below 1250°F, the compliant value established during the performance test.

Check appropriate box

- Identify the HAP being monitored: Polycyclic aromatic hydrocarbon Particulate matter

Provide a brief description of the process unit: Asphalt preparation process is a batch process that involves blowing air through a hot asphalt flux. Blowing occurs in two vertical blowing stills, BS-1 and BS-2. The blowing stills operate independent, but their exhaust gases are controlled by the same thermal oxidizer (TO-1), which discharges to the atmosphere via stack, SK-22.

Provide a brief description of the continuous parameter monitoring system (CPMS): Two thermocouples are installed in the combustion zone of the thermal oxidizer; one is redundant or a backup. The output of each thermocouple is connected to an Abaci electronic recorder/processor that displays and records the temperature of the "selected" input (either of the thermocouples) once every 15 minutes. The Abaci also calculates and records the 3-hour average combustion zone temperature.

- Provide the latest date of the CPMS certification or audit:

Provide the date and time the deviation started: Date: 6/10/11 Time: 1000 hrs

Provide the date and time the deviation stopped: Date: 6/10/11 Time: 1600 hrs

- Did the deviation occur during a period of startup, shutdown, or malfunction? Yes No

[2] Identify (checking the appropriate box), the cause of the deviation. Calculate the duration of the deviation and provide the duration in the box provided the right of the "checked" cause.

**Check appropriate box
For cause of the deviation**

**Calculate and provide the
duration of the deviation, hours**

<input type="checkbox"/>	Startup problems	
<input type="checkbox"/>	Shutdown problems	
<input checked="" type="checkbox"/>	Control device problems	6.0
<input type="checkbox"/>	Process problems	
<input type="checkbox"/>	Other known causes	
<input type="checkbox"/>	Unknown causes	

