

# GAF MATERIALS CORPORATION (DALLAS, TEXAS)

## *Review of Facility Exit Plan* and Future Use Considerations



September 2024

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## List of Acronyms and Abbreviations

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EPA	U.S. Environmental Protection Agency
GAF	GAF Materials Corporation
IM	Industrial Manufacturing
IR	Industrial Research
PD	Planned Development
RCRA	Resource Conservation and Recovery Act
SUP	Specific Use Permit
TCEQ	Texas Commission on Environmental Quality
VCP	Voluntary Cleanup Program

## Report Overview and Purpose

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In 2020, West Dallas 1, a collective of neighborhood associations and community groups, began monitoring local air quality in the West Dallas area of Dallas, Texas, due to health and quality of living concerns. The community group Singleton United/Unidos was formed in 2021. A major focus for both groups is the Buildings Materials Investment Corporation, an asphalt shingle and coating materials manufacturing facility doing business as GAF Materials Corporation, in West Dallas. The groups are concerned about air emissions (e.g., polycyclic aromatic hydrocarbons and particulate matter 2.5) from the facility.

Community activism spearheaded a demand for a hearing with the Texas Commission on Environmental Quality to challenge GAF's Title V air permit renewal. The permit renewal is standard and required every five years. Under the federal 1990 Clean Air Act, major industrial operators must obtain a Title V permit to operate. The TCEQ approved the renewal permit with additional requirements, including a requirement for GAF to increase the frequency of monitoring from quarterly to weekly. The EPA objected to the TCEQ's permit renewal on the grounds that the permit was not in compliance with applicable requirements under the Clean Air Act and 40 CFR Part 70. In 2022, after operational changes, GAF was reclassified as a minor emissions source, negating the need for a Title V operating permit.

The community asked that GAF relocate out of the area. In response, GAF developed a seven-year voluntary timeline, the *New Facility Buildout & Related Impact at West Dallas Site* (referred to here as the *Facility Exit Plan*). The plan includes relocating its operations to a new site and shutting down its operations in West Dallas by 2029. A redevelopment plan described by GAF's consultant Masterplan includes rezoning the property from industrial uses to planned development and remediating the property after closing the facility.

The EPA involved its Technical Assistance Services for Communities program and the EPA's TASC contractor to engage in discussions with West Dallas 1 and Singleton United/Unidos about possible TASC support. As a first step, TASC hosted a virtual meeting with the two community groups, the EPA's Office of Environmental Justice and External Civil Rights and the EPA's Region 6 on August 22, 2023. The purpose of the meeting was to learn more about West Dallas 1's and Singleton United's needs and concerns as they relate to GAF's *Facility Exit Plan* and the future use of the facility property. The EPA wanted to better understand whether and how TASC could support research that relates to the community groups' needs and concerns, and especially needs and concerns that overlap between the two groups.

After further coordination with the community organizations, the EPA authorized the TASC program to conduct research to better understand information related to the *Facility Exit Plan*, how it compares to other exit plans and future use considerations once GAF exits.

This report summarizes the research findings.<sup>1</sup> It is for community members to use as they continue to research questions and topics of concern related to the GAF facility.

## Facility Exit Plan

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### Overview

GAF's *Facility Exit Plan* spans about seven years. It calls for the company to gradually decrease shingle production at its Dallas facility while transitioning operations to a new facility elsewhere. The plan calls for continuous shingle production to fill order requests and maintain GAF's share of the roofing material market. GAF's exit from West Dallas, with a plant shutdown and loss of production, would be offset by GAF's construction and operation of a new facility. In the exit plan timeline GAF presented in 2022, new plant construction (grading and site preparations) was to start in mid-2023. See Table 1 for more plan details.

Reporting in 2024 noted that GAF plans to build a new plant in Newton, Kansas, and that the company worked with city officials in Newton to approve the plan in February 2023. The city of Newton approved zoning changes for industrial uses in the area and approved up to \$350 million in industrial revenue bonds to provide GAF with a 100% property tax abatement for 10 years, dependent on GAF's investment of \$75 million in the project in Newton. TASC did not identify any updates about whether GAF has moved forward with that project or begun site preparations as of March 2024.<sup>2</sup>

According to GAF's *Facility Exit Plan*, new plant completion and production startup is anticipated by May 2027, with full production by 2029. GAF's exit plan timeline indicates it will take six years for a shingle manufacturing plant to be built and reach full production.

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<sup>1</sup> The EPA's TASC program funded this report. Its contents do not necessarily reflect the policies, actions or positions of the EPA.

<sup>2</sup> Collins, N. "Will a new factory in Kansas help GAF 'wind down' a controversial West Dallas shingle plant?" *KERA News*. March 21, 2024. <https://www.keranews.org/news/2024-03-21/will-a-new-factory-in-kansas-help-gaf-wind-down-a-controversial-west-dallas-shingle-plant>.

*Table 1. GAF Facility Exit Plan Timeline and Proposed Activities for Closure by 2029*

Year	Current Facility Location	Anticipated New Facilitation Location
2022	<ul style="list-style-type: none"> <li>Initiate rezoning of the property to Planned Development (PD)/Specific Use Permit (SUP).</li> <li>Reduce raw material production in Dallas.</li> </ul>	<ul style="list-style-type: none"> <li>Begin the search for a new site for a facility and research acquisition and zoning procedures.</li> <li>Begin local and state negotiations for the new site/facility.</li> <li>Begin the design and engineering process.</li> <li>Begin the permitting process.</li> </ul>
2023	<ul style="list-style-type: none"> <li>Continue with rezoning of the property to PD/SUP.</li> </ul>	<ul style="list-style-type: none"> <li>Continue with site search and acquisition and zoning.</li> <li>Continue local and state negotiations for the new site/facility.</li> <li>Continue the design and engineering process.</li> <li>Continue the permitting process.</li> <li>Initiate local infrastructure improvements.</li> <li>Prepare the site for construction (grading and site preparations).</li> <li>Begin procurement process for facility and manufacturing equipment.</li> </ul>
2024		<ul style="list-style-type: none"> <li>Continue with local infrastructure improvements and grading and site preparations.</li> <li>Continue with equipment procurement.</li> <li>Install foundations and begin building construction.</li> <li>Initiate equipment installation.</li> <li>Begin construction of rail spur on-site.</li> </ul>
2025		<ul style="list-style-type: none"> <li>Conclude building construction and obtain a certificate of occupancy.</li> </ul>

Year	Current Facility Location	Anticipated New Facilitation Location
		<ul style="list-style-type: none"> <li>Continue equipment installation.</li> <li>Complete rail spur on-site.</li> </ul>
2026		<ul style="list-style-type: none"> <li>Complete equipment installation.</li> <li>Initiate plant start up.</li> </ul>
2027	<ul style="list-style-type: none"> <li>Reduce raw material and shingle production.</li> </ul>	<ul style="list-style-type: none"> <li>Continue plant start up.</li> <li>Start shingle production at the new facility in May and employ initial staff (about 75%).</li> </ul>
2028	<ul style="list-style-type: none"> <li>Reduce raw material and shingle production.</li> </ul>	<ul style="list-style-type: none"> <li>Fully staff new facility.</li> <li>Achieve 50% output by May.</li> </ul>
2029	<ul style="list-style-type: none"> <li>Reduce raw material and shingle production.</li> <li>Complete raw material and shingle production.</li> </ul>	<ul style="list-style-type: none"> <li>Initiate debottlenecking (production process improvements).</li> <li>Achieve 100% output by midyear.</li> </ul>
<p>Table based on GAF's timeline <i>New Facility Buildout &amp; Related Impact at West Dallas Site</i>, available at <a href="https://drive.google.com/drive/folders/16eb75DsemA1MXlcIZvOaDPrNV_qYcG1I">https://drive.google.com/drive/folders/16eb75DsemA1MXlcIZvOaDPrNV_qYcG1I</a>. See <i>Copy of GAF 2600 Singleton Vision Mtg 1.pptx</i>. Last modified January 24, 2023. Accessed September 19, 2024.</p>		

### *Examples of Relocation Planning for Facilities Comparable to the GAF Facility*

TASC conducted research to find similar construction projects to compare with GAF's proposed relocation timeline. The examples do not include information on the design and permit phase that precedes field construction activities. Table 2 compares GAF's West Dallas facility to facilities with a similar size, number of employees, and construction start and end dates. Table 3 compares GAF's *Facility Exit Plan* with an approximate average of the comparison facilities. Appendix A provides more research findings on the relocation of manufacturing plants.

**Table 2 Comparison of Facility Construction Timelines**

Name	Product	Size	# of Employees	Construction Start Date	Production Start Date
New GAF Dallas replacement facility	Roof shingles	260,000 square feet 27 acres	150	Anticipated by mid-2023	Anticipated May 2027, with full production mid-year 2029
IKO Global's Hillsboro facility (Texas)	Roof shingles	250,000 square feet 60 acres	65	June 2016	December 2017
Atlas Roofing Corp. (Iowa)	Roof shingles	440,000 square feet 148 acres	100	August 2023	Anticipated Quarter 4, 2025
IKO Global's Clay County facility (Florida)	Roof shingles	300,000 square feet 80 acres	100	June 2023	Anticipated mid-year 2025

**Table 3 Comparison of Facility Construction Timelines (approximate average)**

Name	Size	# of Employees	Construction to Production Timeline
New GAF Dallas replacement facility	27 acres	150	48 months
Average comparison facility	96 acres	88	23 months

IKO Global's roofing shingle plant in Hillsboro, Texas (1001 Iko Way, Hillsboro, TX 76645A) is a similar construction project to the one proposed by GAF. Plans for the facility were first announced in 2015. Per Google Earth imagery, site preparations began during the first quarter of 2016.<sup>3</sup> Production began in December 2017, less than two years after construction started. In March 2018, the IKO Global facility employed 65 people. In 2021, a third shift was added,

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<sup>3</sup> IKO North America. IKO Roof Shingle Plant Construction Time Lapse – Hillsboro, Texas. YouTube Video. 2018. [https://www.youtube.com/watch?v=OTN7eOYsE\\_A](https://www.youtube.com/watch?v=OTN7eOYsE_A).



bringing total employment at the Hillsboro plant close to the employment level at GAF's West Dallas facility.

Like GAF, IKO Global is a vertically integrated company, controlling all operations from raw materials to sales. For example, rail line improvements at the Hillsboro plant facilitate raw material deliveries and product shipment. TASC assumes that GAF would desire rail line access at its future facility, similar to its West Dallas operation.

## Future Use Considerations

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### *Future Use Planning Considerations*

Three local land use plans consider future use of the GAF property and broader West Dallas neighborhoods: the *2600 Singleton Vision Plan*, the *West Dallas Community Vision Plan* and the *Singleton Corridor Neighborhood-Led Plan*. GAF's land use consultant Masterplan developed the *2600 Singleton Vision Plan* to address the future use of the GAF property. The *West Dallas Community Vision Plan* and *Singleton Corridor Neighborhood-Led Plan* were led by local groups West Dallas 1 and Singleton United/Unidos.

The *2600 Singleton Vision Plan* calls for rezoning the GAF property to a Planned Development District after 2029, when operations are set to end, to prevent industrial use at the property in the future. GAF anticipates that remediation will be voluntary and privately funded by GAF. Details on remediation goals, regulatory requirements and timelines are unclear.<sup>4</sup> However, TASC assumes remediation oversight would be provided by the Texas Commission on Environmental Quality. GAF presented the *2600 Singleton Vision Plan* to the public and identified mixed use for the future zoning of the property, including possibly up to 2,000 affordable and market-rate units. Industrial use of the property would be prohibited after 2029.<sup>5</sup>

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<sup>4</sup> GAF is classified as a very small quantity hazardous waste generator in EPA's Resource Conservation and Recovery Act Information database (RCRAInfo). Because of this classification, TASC assumes that the property would not be subject to Resource Conservation and Recovery Act facility closure requirements. For more information, see: the EPA's RCRA Info Search (search on Handler ID number: TXD044630895) at <https://enviro.epa.gov/envirofacts/rcrainfo/search>. See also, the EPA's "Frequent Questions About Hazardous Waste Generation." <https://www.epa.gov/hwgenerators/frequent-questions-about-hazardous-waste-generation>. Accessed September 20, 2024.

<sup>5</sup> For more details on GAF's vision for the facility property following facility closure, see *Copy of GAF 2600 Singleton Vision Mtg 1.pptx*. Last modified January 24, 2023. Available at [https://drive.google.com/drive/folders/16eb75DsemA1MXlcIZvOaDPrNV\\_qYcG1J](https://drive.google.com/drive/folders/16eb75DsemA1MXlcIZvOaDPrNV_qYcG1J). Accessed September 19, 2024.

Industries that use large volumes of petroleum products often have significant soil and groundwater contamination at their facilities. Given the status of environmental conditions at the GAF property, the date when the property would be accessible for mixed-use redevelopment is not clear.

To move forward with the *2600 Singleton Vision Plan*, GAF’s consultant submitted a zoning change request in 2022 to update the property’s zoning from Industrial Research (IR) District to Planned Development District. This zoning change request is dependent on sunset conditions for the existing industrial use and future redevelopment considerations. Per GAF’s timeline, the Planned Development District zoning would provide conditions for the winding down of operations, emissions reduction and plant closing over seven years. Table 3 lists the zoning and land use status of the GAF property and surrounding areas in 2022.<sup>6</sup>

***Table 4. GAF Facility – Surrounding Area Zoning and Land Use***

Location	Zoning District	Land Use
GAF Facility	Industrial Research (IR) District <sup>7</sup>	Industrial, office showroom/warehouse
North	PD 508 Planning Development District	Church, multi-family
East	Industrial Research (IR) District	Vacant/undeveloped land
South	Industrial Research (IR) District	Railroad
West	Industrial Research (IR) District	Office, warehouse, non-conforming residential

GAF’s consultant submitted the zoning change request about a year after community plans, including the *West Dallas Community Vision Plan* and the *Singleton Corridor Neighborhood-Led Plan*, were developed. Both community plans center on the investment in and stabilization of West Dallas neighborhoods. These community plans also address environmental justice issues that have been exacerbated by current zoning and industrial uses in the neighborhoods and surrounding areas.

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<sup>6</sup> City of Dallas. Department of Development Services. Zoning Change Application. October 2022. [https://developmentdata.dallascityhall.com/media/documents/ENZ212\\_338\\_sent\\_11-28-22.pdf](https://developmentdata.dallascityhall.com/media/documents/ENZ212_338_sent_11-28-22.pdf).

<sup>7</sup> Information on Dallas zoning districts is available at <https://dallascityhall.com/departments/sustainable-development/planning/Pages/zoning-districts.aspx>. Accessed September 19, 2024.

The *West Dallas Community Vision Plan* is a response to rising property values that threaten to displace legacy residents and gentrify West Dallas. The effort included a fair housing assessment and the formation of an advisory committee comprising West Dallas community members. The goal of the plan was to amplify the community’s voice and propose policy changes to the city of Dallas. The *West Dallas Community Vision Plan* set goals for housing and land use to inform policy amendments. Recommendations for renter and homeowner policies focused on three desired outcomes: mitigating displacement, creating housing opportunities for all incomes, and preserving and stabilizing the neighborhood.

Strategies to improve land use in West Dallas focused on three desired outcomes: protecting and preserving existing single-family neighborhoods, promoting “gentle density” while maintaining neighborhood character and design through opportunities for new and affordable housing choices, and removing and rezoning incompatible industrial uses next to homes, schools and churches. Advocates for the *West Dallas Community Vision Plan* aim to incorporate policy and land use strategies into *ForwardDallas*, the Dallas Planning and Urban Design Department’s comprehensive land use plan.

The *Singleton Corridor Neighborhood-Led Plan* is a response to incompatible industrial uses in the Singleton Corridor. The *Singleton Corridor Neighborhood-Led Plan* identified areas in West Dallas where land use and zoning do not align. The goal is to reconcile these areas by changing zoning based on current land uses. The plan highlighted areas in the Singleton Corridor where housing exists outside of residential zones and where industrial districts are occupied by primarily commercial uses. The *Singleton Corridor Neighborhood-Led Plan* states that residential properties deserve residential zoning and areas with commercial uses should be limited to commercial zoning to prevent heavy industry from further occupying parts of West Dallas.

Table 5 organizes findings from the *Singleton Corridor Neighborhood-Led Plan* that demonstrate industrial zoning districts in the Singleton Corridor are largely occupied by commercial uses and some residential uses. Neighborhood residents also identified a need for educational and recreational opportunities. Current zoning prevents these opportunities.

***Table 5. Singleton Corridor Neighborhood-Led Plan Land Use and Zoning Findings***

Zoning District	Actual Use	Percentage of Parcels, by Use
Industrial Research (IR)	Commercial Retail	24%
	Commercial Service	8%
	Industrial Inside	6%

Zoning District	Actual Use	Percentage of Parcels, by Use
	Industrial Outside	1%
	Single-Family Homes	21%
	Vacant Lot	25%
Industrial Manufacturing (IM)	Commercial Retail	48%
	Commercial Service	16%
	Industrial Inside	8%
	Industrial Outside	5%
	Single-Family Homes	2%
	Vacant Lot	10%

Since the finalization of the *Singleton Corridor Neighborhood-Led Plan* in November 2021, community groups Singleton United/Unidos and West Dallas 1 have been working to integrate goals and action steps with local government decisions. Dallas City Council will vote on *ForwardDallas*, the updated comprehensive land use plan, in November 2024.<sup>8</sup> The plan update provides land use guidelines that the city could reference when responding to zoning change requests in the future.<sup>9</sup> The three goals of *ForwardDallas* are to:

- Help Dallas grow in a way that makes sense for residents.
- Prioritize future land use in areas that historically have borne the brunt of environmental burdens.
- Benefit new and current residents.<sup>10</sup>

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<sup>8</sup> Dallas City Hall. Documents and Resources. *ForwardDallas 2.0 - CPC Interim Combined Draft #4*. June 2024. <https://dallascityhall.com/departments/pnv/Forward-Dallas/Pages/Resources.aspx>.

<sup>9</sup> Rush, M. "West Dallas residents don't trust city plans for their land." *Dallas Free Press*. October 30, 2023. <https://dallasfreepress.com/west-dallas/west-dallas-residents-dont-trust-city-plans-for-their-land>.

Judy, S. "ForwardDallas Explained: How the Land Use Plan Can (and Cannot) Change the City." *The Dallas Weekly*. July 11, 2024. <https://dallasweekly.com/2024/07/forwarddallas-explained-how-the-land-use-plan-can-and-cannot-change-the-city>.

<sup>10</sup> City of Dallas. ForwardDallas Home page. <https://dallascityhall.com/departments/pnv/Forward-Dallas/Pages/default.aspx>. Accessed September 19, 2024.

## *Facility Cleanup Resources*

TASC anticipates that GAF will assume responsibility for the property's remediation, and possibly coordinate cleanup through the TCEQ's Voluntary Cleanup Program. Cleanup under the state program offers protection to future potential developers, including future lenders and landowners, from state liability for cleanup costs. VCP certificates of completion can help remove constraints for future real estate transactions and help facilitate property reuse.

To enroll the property in the program, GAF would need to submit an application, a \$1,000 fee, and a completed *Affected Property Assessment Report*. As part of the application, GAF would need to disclose intended response action objectives regarding the future use of the property. Properties are ineligible for the program if they have a current order or permit from the TCEQ, though applicants may elect to dismiss current orders and/or permits to apply for the program. For more information on the program, see the TCEQ's Voluntary Cleanup Program website.<sup>11</sup>

## **Community Options to Consider**

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As the community continues to engage with GAF, local government officials and the TCEQ, TASC presents the following comments for consideration.

*TASC comment: The community may consider asking about what raw materials are being produced at GAF's West Dallas facility and what reductions have been made to date in the amount of these raw materials produced. The community could also ask if West Dallas plant reductions and final closure are dependent on the completion of GAF's new facility.*

GAF's timeline shows an overlap with new facility construction and existing plant reduction. This would suggest that the plant and/or manufacturing processes will not be relocated or repurposed from the old facility to the new facility. Also not included on the timeline are any West Dallas plant dismantling milestones or completion dates for plant dismantling. In the *2600 Singleton Vision Plan*, GAF indicates it will fund the remediation of the property but is unclear on the timeline for such efforts and the extent of contamination is still unknown. The timeline suggests that the construction of a new GAF plant and the dismantling of the existing plant in West Dallas are considered two independent and unrelated projects.<sup>12</sup>

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<sup>11</sup> TCEQ. Voluntary Cleanup Program. <https://www.tceq.texas.gov/remediation/vcp>. Accessed September 19, 2024.

<sup>12</sup> To see a list of different past and current environmental permits for the facility, see TCEQ's Central Registry ([https://www.tceq.texas.gov/permitting/central\\_registry](https://www.tceq.texas.gov/permitting/central_registry)), and search using the TCEQ's Regulated Entity Reference

*TASC comment: The community could consider asking if GAF has a timeline for the West Dallas plant demolition and property remediation. The community may also want to inquire if GAF plans to repurpose any manufacturing process from the existing plant for the new plant. This would tie the schedules together and potentially result in reductions in air pollution and odor as manufacturing parts shut down and are moved off-site (out of West Dallas).*

*TASC comment: The community could consider asking GAF to share more details on how it plans to remediate the property and how it will involve the TCEQ.*

*TASC comment: The community may also want to ask for a commitment from GAF to hold regular community meetings/updates.*

Dismantling a facility is a complex process; many of these activities can impact the completion schedule. At this time, it is assumed that dismantling will not start until the end of final shingle production in 2029. Dismantling manufacturing processes for relocation to the new facility or to sell may require more time than a demolition approach. Dismantling with the objective of salvaging systems requires a more systematic approach and may require scheduling of cranes and support equipment to move large parts off-site. The schedule would be further constrained by shipping of large/oversized loads. The timing of parts removal would also be dependent on the receiver's timeline (when the next owner can take delivery).

A demolition approach, as opposed to a dismantling approach, may expedite GAF's exit from the West Dallas location but comes with its own challenges. Demolition would break down all aboveground structures. Demolition material could be removed from the property via trucks or perhaps rail. Case studies of other demolition projects indicate that this could be a short-term process, taking less than a year (the IKO Global facility in Wilmington, Delaware, and the asphalt plant in Ardmore, Indiana).<sup>13</sup> After aboveground works are broken down and removed, concrete pads and footers will be exposed. Removal of groundwork will require more time and continue to generate air pollution.

Financial incentives could potentially accelerate GAF's plant dismantling timeline. There are potential financial benefits for GAF to reuse or sell plant parts through a dismantling process. Salvaged steel from demolition could potentially offset some of the demolition costs. However, there is typically no economic return on the breakup and removal of concrete pads and footers.

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Number RN100788959. See also the EPA's Envirofacts Multisystem Search (<https://enviro.epa.gov/envirofacts/multisystem/search>), and search using EPA facility ID number TX0000004811300036.

<sup>13</sup> Appendix A provides more information about these projects and other examples.

As an example, Google Earth images of the IKO Global property in Wilmington, Delaware, show concrete pads still intact there. The IKO Global plant ended production in the first quarter of 2021. Google Earth images dated November 2021 show all aboveground areas are gone, but concrete pads, foundations and footers remain. Further, the Google Earth images show no equipment or partial demolition of the concrete, and no change at the property since. From a street-level view, the facility is gone. However, the property does not yet appear ready for redevelopment.

A potential motivation for GAF to complete demolition work could be to sell the property to developers. It is assumed that the property would change ownership only after all structures and foundations are gone, and a clean dirt tract is available for a developer to work with.

Health and environmental concerns do not end with the closure of the GAF facility. With the end of shingle production in 2029, it is assumed that furnaces to heat asphalt and other machinery will stop operating. With the end of production, deliveries of raw materials and the export of roofing materials will also stop. All these activities likely contribute to poor air quality and odor complaints. After these emission sources are removed, dismantling/demolition activities may continue to impact air quality.

Demolition activity (active breakup of structures and associated truck traffic) will likely resuspend site dust in the air. Dust control measures will be needed during these activities. Dust control measures could include enclosing machinery before removal, wetting the work site and breakup area with water, and limiting work to favorable weather conditions. Even with the end of production targeted for 2029, the surrounding community should still anticipate air pollution concerns during the facility teardown process.

The full environmental impact of the GAF facility on the surrounding area is unknown. Air pollution and odors are noted as current health, environmental and community concerns. These concerns are expected to be significantly addressed by the end of production and plant removal. Pollution may remain on the property after the removal of the facility. Soils may be contaminated and distributed to nearby neighborhoods from future construction activities or simply by wind events. It is also unknown at this time what levels of contamination may be present in the ground and possibly the groundwater as a result of historical facility operations.

This report does not identify any specific contamination concerns, only that an environmental assessment will be required before ownership transfer. Property cleanup before ownership transfer may extend beyond the physical removal of the facility structures.

*TASC comment: The community may consider engaging with the TCEQ about any potential cleanup at the property to request community impact mitigation and consideration of*

*community benefits as part of cleanup decisions related to any VCP agreement. The community may also consider engaging with local government officials for support for developing permit conditions and/or drafting community benefit agreements that also incorporate community impact mitigation and community benefits into any future permit approval decisions.*



## Appendix A: Examples of Other Facilities with Similarities to the GAF Facility

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### *Facility Construction*

#### *IKO Global Roof Shingle Plant Construction – Hillsboro, Texas*

- Took place from July 2016 to early 2018.
- Consists of a 250,000-square-foot facility.
- Will employ 65 people initially, with plans to expand (slightly less than GAF employment).
- Plan announced in 2015. Construction started in June 2016 and finished within 18 months.
- Production began in December 2017; opening ceremony held in March 2018.
- IKO Global is a “vertical-integrated” company, controlling all operations from raw materials to sales (similar to GAF).
- Sources:
  - IKO Global Roof Shingle Plant Construction Time Lapse – Hillsboro, Texas. [https://www.youtube.com/watch?v=OTN7eOYsE\\_A](https://www.youtube.com/watch?v=OTN7eOYsE_A). Accessed September 19, 2024.

#### *IKO Global Shingle Plant – near Baldwin, Florida*

- Facility is located near U.S. 301 and County Road 218.
- Construction is scheduled to start in 2023.
- Project cost is \$270 million.
- The facility covers about 300,000 square feet.
- Shingles production line to start shipping shingles by mid-2025.
- Construction will include an asphalt shingle production facility, in addition to an insulation board plant and a commercial rolled roofing plant. The facility will initially employ about 100 people.
- The county waived some fees as an incentive.
- Sources
  - Mathis, K.B. “IKO announces \$270 million Clay County shingle plant.” *Jacksonville Daily Record*. June 1, 2023. <https://www.jaxdailyrecord.com/news/2023/jun/01/iko-announces-270-million-clay-county-shingle-plant>.

#### *Atlas Roofing Corp. – Clinton, Iowa*

- Estimated cost for facility startup is \$224 million.
- Facility will support 100 to 200 new jobs.
- Construction started in August 2023.
- Planned start of production shipments is Quarter 4 of 2025.
- Atlas Company is 40 years old.
- The facility will cover about 440,000 square feet (with potential expansion to 500,000 square feet).
- Sources
  - Thompson, D. “UPDATED: Clinton welcomes new \$224M plant Atlas plant.” *Quad Cities Regional Business Journal*. August 23, 2023. <https://quadcitiesbusiness.com/atlas-breaks-grounds-on-new-224m-plant-in-clinton>.
  - Atlas Roofing. “Atlas Roofing Corp. Announces New Shingle Facility to be Built in Clinton, IA.” April 1, 2023. <https://www.atlasroofing.com/asphalt-life/atlas-roofing-corp-announces-new-shingle-facility-to-be-built-in-clinton-ia>.
  - Roofing Contractor. “Atlas Roofing Corporation to Build State-of-the-Art Shingle Manufacturing Facility.” August 19, 2022. <https://www.roofingcontractor.com/articles/97354-atlas-roofing-corporation-to-build-state-of-the-art-shingle-manufacturing-facility>.

#### *All Roads Construction Asphalt Plant – Vancouver, Canada*

- Construction started in November 2019. The plant produced the first batch of asphalt in June 2020.
- Video (see link below) mentions two years of “determined effort” (planning and permitting) before construction.
- Sources
  - All Roads Construction Ltd. “All Roads Asphalt Plant Construction – Part 3 – First Day of Asphalt Production.” <https://www.youtube.com/watch?v=bnvp5EYE5aI>. Accessed September 18, 2024.

### ***Facility Demolition***

#### *IKO Global – Wilmington, Delaware (120 Hay Rd., Wilmington, Delaware 19809)*

- Production stopped in Quarter 1 of 2021.
- November 2021 Google Earth Pro image shows the facility removed to ground level (only concrete pad remains, no activity in image).
- Sources
  - Google Earth Pro

- Owens, J. “IKO to shut down Edgemoor plant, lay off 60+.” *Delaware Business Times*. February 4, 2021. <https://delawarebusinesstimes.com/news/iko-edgemoor-closure>.

## *Facility Demolition and Construction*

### *Asphalt Plant – Ardmore, Indiana*

- Demolition began in 2020.
- Construction of a new plant finished in spring 2021.
- This plant was the company headquarters.
- Video shows project timelapse (see link below).
- Sources
  - Brooks Construction. “Asphalt Plant Demo & Rebuild.” <https://www.youtube.com/watch?v=7JMt3xyWiZU>. Accessed September 19, 2024.

## *Facility Closure*

### *Asphalt Plant – Irvine, California*

- Plant closed in November 2023.
- City of Irvine bought out the factory for \$285 million.
- Plans are to turn most of the area into a nature preserve and to sell 80 acres for redevelopment (no identified redevelopment plans yet).
- Timeline for an environmental review is 18 to 24 months.
- Sources
  - Sheets, T. “Updated: As options to relocate asphalt plant loom, residents voice frustration, concern.” *The Orange County Register*. September 30, 2022. <https://www.ocregister.com/2022/09/28/as-options-to-relocate-irvine-asphalt-plant-loom-residents-voice-frustration-concern> (subscription required).
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## *Brownfield Redevelopment*

### *Globe/Beacon Hill – St. Paul, Minnesota*

- Asphalt shingle company went out of business in 2001.
- Cleanup took place from October 2003 to September 2008.
- Total cleanup cost was \$3.1 million.
- Sources
  - EPA. Brownfields Revolving Loan Fund Pilot Profile: St. Paul Port Authority. <https://cimc.epa.gov/ords/cimc/f?p=121:23::::0:P0 GRANT ID:69597368>. Accessed September 19, 2024.

## *Air Emissions Permit*

### *Asarco – El Paso, Texas (2004)*

- Air emissions permit denied; led to plant closure and bankruptcy/cleanup process.
- Sources
  - TCEQ. Interim Order. March 10, 2006. [https://www.tceq.texas.gov/assets/public/agency/attachment\\_a.pdf](https://www.tceq.texas.gov/assets/public/agency/attachment_a.pdf).
  - John Burnett. NPR. KERA. “A Toxic Century: Mining Giant Must Clean Up Mess.” February 4, 2010. <https://www.npr.org/2010/02/04/122779177/a-toxic-century-mining-giant-must-clean-up-mess>.

## *Other Potentially Relevant Information*

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