

Permit Amendment Source Analysis & Technical Review

Company	Pioneer Hi-Bred International, Inc.	Permit Number	3168
City	Plainview	Project Number	389646
County	Hale	Regulated Entity Number	RN102452307
Project Type	Amendment	Customer Reference Number	CN601098999
Project Reviewer	Joel Stanford	Received Date	February 28, 2025
Site Name	Pioneer Hi-bred Plainview Plant		

Project Overview

The Applicant has requested an amendment of their permit to upgrade the site's dust collection system. This includes replacing existing cyclones with bagfilters along with re-routing portions of the pickup system to existing dust collectors. Many of the existing cyclone emission rates appear to have been transcribed incorrectly, accordingly the increase listed below is not an actual increase in emissions, as rates are expected to decrease given the much lower emissions associated with dust collectors compared to cyclones.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	11.61	13.84	2.23
PM ₁₀	7.76	10.77	3.01
PM _{2.5}	7.09	10.14	3.05
VOC	0.27	0.27	0.00
NO _x	6.69	6.69	0.00
CO	5.60	5.60	0.00
SO ₂	0.04	0.04	0.00

Federal Rules Applicability

Requirement	
Subject to NSPS?	No, NSPS does not apply since the site is not an affected facility under 40 CFR Part 60.
Subject to NESHAP?	No, the site does not emit any air contaminants regulated under 40 CFR Part 61.
Subject to NESHAP (MACT) for source categories?	No, the site is not a listed source category regulated under 40 CFR Part 63.
Nonattainment review applicability:	N/A; the site is not located in a nonattainment area.
PSD review applicability:	N/A; the facility is an existing PSD minor unnamed source and will remain so.

Title V Applicability - 30 TAC Chapter 122 Rules

Permit Amendment Source Analysis & Technical Review

Permit Number: 3168
Page 2

Regulated Entity No. RN102452307

Requirement

Title V applicability:

N/A, the site is not a major source nor is it an area source subject to Title V.

Periodic Monitoring (PM) applicability:

The site is not subject to PM, however once per operating season observations for the dust collectors are required along with records of production/throughput.

Compliance Assurance Monitoring (CAM) applicability:

N/A, the site is not a major source nor is it an area source subject to Title V.

Process Description

The existing process of receiving, treating, drying, and loading seeds has not changed with this project.

Project Scope

The Applicant has requested an amendment of their permit to upgrade the site's dust collection system. This includes replacing existing cyclones with bagfilters along with re-routing portions of the pickup system to existing dust collectors.

The MAERT was updated to remove all cyclones along with including the new dust collectors.

The Special Conditions were updated to remove the cyclones, add dust collectors as needed, and to include quarterly visible emissions check requirements for the dust collectors.

Best Available Control Technology

Sources were not modified with this application; however, the efficiencies of dust collectors are reported below.

Source Name	EPN	Best Available Control Technology Description
Gravity #1	DC-3	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Gravity #2	DC-4	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Scalperator Cleaner D2/SC-2	DC-5	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Bulk #1-4 Storage Bins and Rec 3	DC-6	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Scalperator (D2/SC-2) and Elevator Legs (D1, D2/E-1) Dust Collector	DC-7	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Receiving No 4 and Scalperator Cleaner D4/SC-4 Dust Collector	DC-8	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Scalperator (D5/SC-5) and Elevator Legs (D5/E-1, D5/E-2, D5/E-3) Dust Collector	DC-9	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Elevator Legs (D5/E-1, D5/E-2, D5/E-3), Tripper Belt Conveyor (D5/TB-1), Bin 13, Bin 1, Belt Conveyors (D5/B-1, D5/B-2)	DC-10	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf

Permit Amendment Source Analysis & Technical Review

Permit Number: 3168

Regulated Entity No. RN102452307

Page 3

General Housekeeping, Cleaner, Line 1 and Line 2 Seed Aspirator, and Treater/Bagging (4 - FLT-8, FLT-9, FLT-10, FLT-12)	FUG-1	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Rework (1 Fabric Filter Dust Collector - FLT-11)	FUG-2	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf
Parent Seed Plant Dust Collector System	DC-1	PM: Dust collector with an outlet grain loading of 0.01 gr/dscf
Parent Seed Aspirator	DC-2	PM: Dust collector with an outlet grain loading of 0.005 gr/dscf

Impacts Evaluation

Was modeling conducted? **No***

Type of Modeling: **N/A**

Is the site within 3,000 feet of any school?

No

Additional site/land use information: The facility is located in a rural location and is surrounded on all sides by a mixture of agricultural land and agricultural facilities.

Summary of Modeling Results

Modeling was not requested for this application due to the facility being classified as a seasonal minor source. The facility has existing hours of operation limitations which are equivalent to one season.



Project Reviewer
Joel Stanford

03/13/2025

Date



Section Manager
Bonnie Evridge

03/13/2025

Date