Permit by Rule (PBR) Registration Technical Review

Company:	C. H. Guenther & Son LLC	Registration No.:	138487
Nearest City:	Dallas	Project No.:	390969
County:	Dallas	Project Type:	Revision
Project Reviewer:	Briannah Spooner	Regulated Entity No.:	RN109011213
Unit Name:	Pioneer Frozen Foods Langdon Road Site	Customer Reference No.:	CN605687227
PBR No(s).:	106.261, 106.262, 106.373	Project Received Date:	March 31, 2025
Physical Location:	4616 LANGDON RD		

Project Overview / Process Description

C.H. Guenther & Son LLC owns and operates the Pioneer Frozen Foods Langdon Road Site located in Dallas County, Texas. The purpose of this project is to amend PBR Registration No. 138487 and construct two (2) flour silos, product mixing and transfer operations, and two (2) ovens associated with a new McGriddle production line.

This application seeks to register and certify the following sources:

- Bulk Flour Silos No. 1 and 2 (106.261), previously registered in 2016;
- Bulk Flour Silo No. 3 (106.261), previously registered in 2019;
- Ammonia refrigeration system (106.373), previously registered in 2016 (not certified);
- Bulk Flour Silos No. 4 and 5 (106.261); and
- Product dry material transfers and mixing (106.261 and 106.262).

Authorization for the following sources are being claimed:

- Three (3) ovens (106.244);
- Emergency generator (106.511) and on-board diesel tank (106.472);
- Vegetable oil tank (106.472);
- Welding (106.227);
- Handheld abrasive grinding (106.265); and
- Remote reservoir parts washer (106.454).

The site will construct two (2) lines to manufacture McGriddle buns for shipment to commercial customers. Flour is delivered pneumatically via truck to two (2) silos (EPNs: SILO4-SILO5), located outdoors. Each silo is controlled by a dedicated bin vent filter (99.9% filter efficiency). Other dry ingredients, such as salt, sugar, baking soda, and dextrose, are delivered in various sizes of bags, boxes, and supersacks and stored indoors. Bulk flour is introduced to the main lines, called the "Majors" line, from the silos. Dry ingredients utilized in smaller quantities are typically pre-weighed/scaled using three methods: hand dump via bags into a scale hopper (FIN: BagDump), unloading via supersack into a feeder (FIN: AccumHopper), and small transfers by hand at two (2) weigh stations (FIN: WeighStation).

The facility also includes a line to manufacture biscuits for shipment to commercial customers. Flour is pneumatically delivered via truck to three (3) silos (EPNs: SILO1-SILO3) located outdoors. Each silo is controlled by a dedicated bin vent filter (99.9% filter efficiency). Other dry ingredients, similar to the McGriddle line, are delivered in bags, boxes, and supersacks. Bulk flour is introduced to the line via the silos. Dry ingredients used in smaller quantities are typically pre-weighed/scaled using the same three methods described under the McGriddle line. The same Minors Ingredient equipment is used to serve both lines.

This facility operates up to 24 hours per day, 225 days per year, for a total of 5,400 hours per year.

Permit by Rule Requirements - 30 TAC Chapter 106 General Requirements

Registration Fee Reference No.:	Application fee: 760023 / 582EA000661669
	Surcharge fee: 760024 / 582EA000661669
Is this registration certified?	Yes
Is planned MSS included in the registration?	No
Are there affected NSR or Title V authorizations for the project?	No

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If there are affected Title V authorizations, is monitoring being submitted as part of this registration?	No
Are there any upstream or downstream affects associated with this registration?	No
Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations.	NA
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	Yes
Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits?	Yes
Are there permit limits on using PBRs at the site?	No
Is the facility in compliance with all other applicable rules and regulations?	Yes
Does the registration include an appropriate PBR workbook, and has the workbook been verified?	Yes
Notes:	

Federal Applicability

Does this project trigger a PSD or Nonattainment review?	No
Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions?	NA
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	Yes
If Yes, list applicable subparts: NSPS IIII: MACT 7777	

Notes:

Permit by Rule Requirements - Compliance Demonstrations

PBR 106.261/262 Facilities (Emission Limitations / Emission and Distance Limitations)

The emission point(s) associated with the facilities or changes to facilities are located at least 100 ft (Actual: 430 ft) from the nearest off-site receptor.

The total new or increase emissions will comply with the applicable hourly and annual emission limits as represented in the table below.

Any facilities handling chemicals included in \$106.262(a)(4) will be > 300 ft from the nearest property line and > 600 ft from any off-site receptor and the cumulative amount of any of the listed chemicals resulting from one or more authorizations under this section will be < 500 pounds on the plant property and all listed chemicals shall be handled only in unheated containers operated in compliance with the United States Department of Transportation regulations (49 Code of Federal Regulations, Parts 171-178).

There are no changes to or addition of any pollution abatement equipment.

Visible emissions to the atmosphere, from any point or fugitive source, do not exceed 5.0 percent opacity in any six-minute period.

This registration does not authorize construction or changes to a facility authorized under another section of this chapter or under standard permit.

PBR 106.373 Refrigeration Systems

Refrigeration systems, including storage tanks used in refrigeration systems, that use one of the following categories of refrigerant are permitted by rule:

(1) simple asphyxiants limited to argon, carbon dioxide, ethane, helium, hydrogen, methane, neon, nitrogen, propane, propylene, or liquefied natural gas; or

(2) any other chemical, excluding anhydrous ammonia, with a short-term effects screening level (ESL) published in the commission's ESL list greater than 150 μ g/m3

(3) anhydrous ammonia (ammonia) provided:

(3)(A) the facility is registered with the commission's Office of Permitting, Remediation, and Registration in Austin using Form PI-7; and

(3)(B) the system is maintained in good working order and such that ammonia leaks are not detectable beyond the operator's property line.

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Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report wa	as reviewed on:	April 2, 2025
Site rating / classification: 2.20 / Satisfactory	Company rating / classification:	0.88 / Satisfactory
Has any action occurred on the basis of the compliance history or ratir	ng?	No
Did the Regional Office provide site approval and confirm distances?		NA

106.261(a)(2) Emissions

Chemical	Criteria Pollutant Designation	CAS No. (optional input)	Emission Threshold (lb/hr)	Emission Threshold (tpy)	Hourly Emissions (lb/hr)	Annual Emissions (tpy)	Meets Threshold?
Cellulose Fiber	РМ		6	10	0.99	1.03	Yes
FIDEI							
Sucrose	PM	57-50-1	6	10	0.01	0.01	Yes
Starch	PM	9005-25-8	6	10	9.00E-03	0.01	Yes

106.261(a)(3) Emissions

Chemical	Criteria Pollutant Designation	L Value (mg/m³)	CAS No. (optional input)	Emission Threshold (lb/hr)	Emission Threshold (tpy)	Hourly Emissions (lb/hr)	Annual Emissions (tpy)	Meets Threshold?
Sodium chloride	PM		7647-14-5	1	4.38	9.00E-03	9.00E-03	Yes
Dextrose	PM			1	4.38	2.00E-03	2.06E-03	Yes
Sodium bicarbonate	PM		144-55-8	1	4.38	9.00E-03	0.01	Yes

106.262(a)(2) Distance

Distance to nearest off-plant receptor (feet	: 430
K valu	97.1

106.262(a)(2) Emissions - 1997 ACGIH Guide

Pollutant (optional (mg/m³) Hourl		E, maximum Hourly	Actual Emission	Actual Hourly	Actual Annual	Meets Threshold?		
	Designation	input)		Emission Threshold (lb/hr)	Threshold (tpy)	Increases (lb/hr)	Increase (tpy)	
Particulates Not Otherwise Classified - Inhalable	РМ		10	1.03E-01	4.51E-01	0.09	0.10	Yes

Total 106.261/262 Combined Emissions

	Total Hourly Emissions (lb/hr)	Total Annual Emissions (tpy)						
Total PM Emissions:	1.12	1.17						

*Note: Speciation for cellulose fiber is conservatively represented as 100% of the total throughput.

Emission Summary

EPN / Emission Source	VC)C	N	Эх	С	0	Р	М	PN	/I 10	PN	1 _{2.5}	S	D ₂
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
SILO1 / Silo No. 1							0.20	0.21	0.07	0.07	0.07	0.07		
SILO2 / Silo No. 2							0.20	0.21	0.07	0.07	0.07	0.07		
SILO3 / Silo No. 3							0.20	0.21	0.07	0.07	0.07	0.07		
SILO4 / Silo No. 4							0.20	0.21	0.07	0.07	0.07	0.07		
SILO5 / Silo No. 5							0.20	0.21	0.07	0.07	0.07	0.07		

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MAXIMUM OPERATING SCHEDULE: Hours/Yea												s/Year	5,400	
TOTAL EMISSIONS (TPY):								1.05		0.35		0.35		
MIRFUG / MIR fugitives							< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01		
MINORDC / MIR dust collector	-						<0.01	<0.01	<0.01	<0.01	<0.01	<0.01		
BISFUG / Biscuit Line							< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01		
GRIDFUG / McGriddle Line							< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01		

Briannah Spooner

April 24, 2024 Date

Ms. Briannah Spooner Permit Reviewer Rule Registration Section Michael Partee, Manager Rule Registrations Section Air Permits Division Section Manager

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April 25, 2024

Date