



# MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

## PERMIT TO OPERATE

B014540

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

**EXPIRES LAST DAY OF: SEPTEMBER 2026**

### OWNER OF OPERATOR (Co. #1531)

Mars Petcare US Inc.  
2013 Ovation Parkway  
Franklin, TN 37067

### EQUIPMENT LOCATION (Fac. #2600)

Mars Petcare  
13243 Nutro Way  
Victorville, CA 92392

#### Description:

FINISH PRODUCT PACKAGING BINS consisting of: Receiving systems, storage bins, and related conveying system. Receiving systems, storage bins, hammermills, and related conveying system. Facility elevation is 2930 feet above sea level. Note: PM-10 emissions is limited to less than 93,437 pounds per year (46.72 TPY). It is noted that PM-10 emissions have been fully offset to this amount through a series of previous NSR activities pursuant to District Regulation XIII. All Dust Collectors associated with this Ingredient Handling System vent internally within the Final Product Packaging buildings.

#### EQUIPMENT

Capacity	Equipment Description
0	Eleven (11) Final Packaging Bins for Final Product Storage before packaging - Bins # 701, 702, 703, 704, (705 - Spare Not Currently Operational), 706, 707, 708, 709, (710 - Spare Not Currently Operational), & 715
67.5	Nine (9) Packaging Bin Vent Filters (Horizon 58RF14) each equipped with 7.5 HP fans (Fan model HS-15A) (serving Bins 701, 702, 703, 707, 708, 709)
20	Final Product Pneumatic Conveyance Compressor - 1
20	Final Product Pneumatic Conveyance Compressor - 2
20	Final Product Pneumatic Conveyance Compressor - 3
0	Eleven (11) Final Packaging Bins for Final Product Storage before packaging - Bins # 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, & 715
45	Six (6) Packaging Bin Vent Filters (Horizon 58RF14) each equipped with 7.5 HP fans (Fan model HS-15A) (serving Bins 701, 702, 702, 707, 708, 709)
2.25	Three (3) Packaging Bin Vent Filters (Boedecker) each equipped with 0.75 HP fan (serving bins 704, 706, 710)

Fee Schedule: 1 (b)

Rating: 174.75 bhp

SIC: 2047

SCC: 30200804

Location/UTM(Km):  
474E/3817N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Mars Petcare US Inc.  
Attention: Gregg Elmore  
  
Victorville, CA 92392

By: **COPY**  
**Eldon Heaston**  
Air Pollution Control Officer

## CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer, supplier, and or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[District Rule 1302]

2. The owner operator shall conduct a minimum program of inspection and maintenance on this equipment, and maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State or Federal personnel upon request:

- Quarterly process stack observation date and results, using EPA Method 22, and EPA method 9 if Method 22 detects visible emissions, or In lieu of Method 9, owner operator may cease operations until deficiencies contributing to opacity are corrected.
- Quarterly filter support system inspection date and results;
- Date of filter replacements, and,
- Date and nature of any system repairs.

[District Rules 1303]

3. The owner operator shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

- As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
- Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection (a) of District Rule 401 (20% opacity).

[District Rule 401]

4. This equipment shall not be operated unless the air pollution control devices with the following permits are in place and properly operating (as applicable): C009315, C009316, C009317, C009318, C009319, C009320, C009321, C009725, and C009726.  
[District Rule 1302]

5. The owner operator shall maintain on-site a minimum inventory of replacement bin vent bags, filters and/or cartridges that assures compliance with these conditions.  
[District Rule 1302]

6. The owner operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District personnel upon request:

- Monthly facility finished production, in pounds or tons, and
- Cumulative last-twelve-month facility finished production, in pounds or tons.

[District Rule 1302]

7. This facility shall not produce more than 220,000 tons per year of finished product, calculated on a rolling twelve month basis, additionally, this facility shall not re-package more than 11,000 tons per year of finished product, calculated on a twelve month basis.  
[District Rule 1302]

8. The entire facility shall not emit any of the Regulated Pollutants listed below in excess of the following limits in any consecutive 12 month period to remain below the USEPA's Synthetic Minor - 80% (SM-80) threshold:

- Oxides of Nitrogen (NOx): 20 tons per consecutive twelve (12) month period, measured as NO<sub>2</sub>;
- Oxides of Sulfur (SOx): 20 tons per consecutive twelve (12) month period;
- Volatile Organic Compounds (VOC): 20 tons per consecutive twelve (12) month period;
- Carbon Monoxide (CO): 80 tons per consecutive twelve (12) month period;
- Hydrogen Sulfide (H<sub>2</sub>S): 8 tons per consecutive twelve (12) month period;
- Lead (Pb): 0.48 tons per consecutive twelve (12) month period;
- Particulate Matter 10 microns and less (PM<sub>10</sub>): 46.72 tons (93,437 pounds - District Rule 1303(B) - basis: limit offset) per consecutive twelve (12) month period;
- Any single Hazardous Air Pollutant (HAP): 8 tons per consecutive twelve (12) month period; and,
- All HAPs combined: 20 tons per consecutive twelve (12) month period. Compliance with these limits shall be demonstrated through the submission of a facility-wide Comprehensive Emission Inventory (CEI) for all emitted Regulated Air Pollutants. Exceedance of these

emission limits may trigger offsets, BACT, National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or require submission of a Title V permit application.

[District Rules 1302 and 1303]

9. This facility shall emit less than 8 tons per year (tpy) of a single HAP and 20 tpy of all HAP's. To ensure compliance, the owner/operator shall calculate and record the annual emissions of Federal Hazardous Air Pollutants (HAP's) in tpy on a calendar year basis (January 1 through December 31). The list of HAP's can be found in Section 112(b)(1) of the Federal Clean Air Act or at web site: <http://www.epa.gov/ttn/atw/188polls.html>.

[District Rule 1302]

10. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.

[District Rule 107(b); H&S Code 39607 & 44341-44342; and 40 CFR 51, Subpart A]