



**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**

14306 Park Avenue Victorville, CA92392-2310  
 760.245.1661 -- 800.635.4617 -- FAX760.245.2022

**PERMIT TO OPERATE**

B009720

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 2025**

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

Mars Petcare US Inc.  
 2013 Ovation Parkway  
 Franklin, TN37067

**EQUIPMENT LOCATION (Fac. #2600)**

Mars Petcare  
 13243 Nutro Way  
 Victorville, CA92392

**Description:**

PROCESS LINE #3 consisting of: Weighing, conveying, conditioning, extruding, drying/cooling, sizing, coating, and final cooling equipment. Equipment that is common to all process lines is included in Process Line #1 (B008780). For rating purposes, 1 brake-horsepower is equal to 2544 Btu/hour. 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. Facility elevation is 2930 feet above sea level.

**EQUIPMENT**

Capacity	Equipment Description
0.00508	Drag Conveyor (2 hp; 5088 Btu/hr)
0.01908	Surge Bin Roto Motor (7.5 hp; 19080 Btu/hr)
0.00762	Screw Feeder, 9" D by 84" (3 hp; 7632 Btu/hr)
0.07631	Conditioning Cylinder (30 hp; 76320 Btu/hr)
0	Wenger Preconditioner Vent Control System
1.2	Extruder Intake Air Conditioning System (1.2 MMBtu/hr)
1.0176	Extruder (400 hp; 1017600 Btu/hr)
0.01272	Extruder Knife Assembly (5 hp); 12720 Btu/hr)
0.1908	Vacuum Conveying System (75 hp; 190800 Btu/hr)
0.01525	Two Dryer/Cooler Product Conveyors, Top and Bottom Pass 120" W (3 hp each; 15264 Btu/hr)
0.05088	Cooler Intake Fan (20 hp; 50880 Btu/hr)

Fee Schedule: 2 (e)      Rating: 15900000Btu      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, CA92392

By: **COPY**  
 Brad Poiriez  
 Air Pollution Control Officer

Capacity	Equipment Description
12	Four Eclipse Model WX300 3 MMBtu/hr Dryer Burners (12 MMBtu/hr total)
0.5	Eclipse Model AH050 Cooler Burner (0.5 MMBtu/hr)
0.05088	Four Dryer Combustion Air Fans (5 hp each; 50880 Btu/hr)
0.00254	Three Dryer Agitators (1 hp each; 7632 Btu/hr)
0.20352	Eight Dryer Recirculating Fans (10 hp each; 203520 Btu/hr)
0.02544	Cooler to Dryer Recirculating Fan (10 hp; 25440 Btu/hr)
0.00336	Four Dryer/Cooler Fines Screw Conveyors (0.33 hp each; 3358.08 Btu/hr)
0.01908	Screw Conveyor (7.5 hp; 19080 Btu/hr)
0.00254	Two Airlocks (0.5 hp each; 2544 Btu/hr)
0.00762	Vibrating Conveyor 24" by 8" by 17'6" (3 hp; 7632 Btu/hr)
0.15264	Pneumatic Conveyance System #1 (60 hp; 152640 Btu/hr)
0.05088	Pressure Blower Package (20 hp; 50880 Btu/hr)
0	One Dry Product Holding Bin (1691 cubic feet each)
0.0178	Two Deck Screen (3 hp with 0.5 hp airlock; 17808 Btu/hr)
0	Weigh Belt Feeder
0	Vacuum Coater
0.00636	Oil/Fat Pump System (2.5 hp; 6360 Btu/hr)
0.03815	Liquid System (15 hp total; 38160 Btu/hr)
0.00127	Dry Flavoring Airlock (0.5 hp; 1272 Btu/hr)
0.03815	Flavoring System Vacuum Blower (15 hp; 38160 Btu/hr)
0	Pneumatic Conveyance System #2 (60 bhp; 152640 Btu/hr); Rating is referenced below.
0	Post Coat Vertical Cooler #3, Geelen Model 2800 X 3800
0.027983	Four Drag Conveyors (three 2 hp and one 5 hp; 27984 Btu/hr)
0.15264	Line #3 Pneumatic Conveyance System #2 with 60-HP blower (existing equipment; 152640 Btu/hr)
0.00508	Line #3 2-HP Airlock (existing equipment; 5088 Btu/hr)
0	ODOR ELIMINATION SYSTEM #3; Permit Number C011138

## 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]

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 the bin vents serving this equipment. 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 bin vent stack observation date and result 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 bin vent bag, filter, cartridge, and suspension system inspection date and results;
- Date of bin vent bag, filter, cartridge replacements; and,
- Date and nature of any system repairs.

[District Rule 1303]

2.The owner operator shall conduct a minimum program of inspection and maintenance on the bin vents serving this equipment. 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:

- a. Quarterly process stack observation date and result 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.
  - b. Quarterly bin vent bag, filter, cartridge, and suspension system inspection date and results;
  - c. Date of bin vent bag, filter, cartridge replacements; and,
  - d. Date and nature of any system repairs.
- [District Rule 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:
- a. 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
  - b. 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]

- 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:
- a. 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
  - b. 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): C009709, C009721, C009722, C009724, C011135, C011138, C011143, and C011824.
- [District Rule 1302]

- 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): C009709, C009721, C009722, C009724, C011135, C011138, C011143, and C011824.
- [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]

- 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 beprovided to District personnel upon request:
- a. Monthly facility finished production, in pounds or tons, and
  - b. Cumulative last-twelve-month facility finished production, in pounds or tons.
- [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 beprovided to District personnel upon request:
- a. Monthly facility finished production, in pounds or tons, and
  - b. 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]

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:

- a. Oxides of Nitrogen (NOx): 20 tons per consecutive twelve (12) month period, measured as NO<sub>2</sub>;
- b. Oxides of Sulfur (SO<sub>x</sub>): 20 tons per consecutive twelve (12) month period;
- c. Volatile Organic Compounds (VOC): 20 tons per consecutive twelve (12) month period;
- d. Carbon Monoxide (CO): 80 tons per consecutive twelve (12) month period;
- e. Hydrogen Sulfide (H<sub>2</sub>S): 8 tons per consecutive twelve (12) month period;
- f. Lead (Pb): 0.48 tons per consecutive twelve (12) month period;
- g. 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;
- h. Any single Hazardous Air Pollutant (HAP): 8 tons per consecutive twelve (12) month period; and,
- i. 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]

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:

- a. Oxides of Nitrogen (NOx): 20 tons per consecutive twelve (12) month period, measured as NO<sub>2</sub>;
- b. Oxides of Sulfur (SO<sub>x</sub>): 20 tons per consecutive twelve (12) month period;
- c. Volatile Organic Compounds (VOC): 20 tons per consecutive twelve (12) month period;
- d. Carbon Monoxide (CO): 80 tons per consecutive twelve (12) month period;
- e. Hydrogen Sulfide (H<sub>2</sub>S): 8 tons per consecutive twelve (12) month period;
- f. Lead (Pb): 0.48 tons per consecutive twelve (12) month period;
- g. 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;
- h. Any single Hazardous Air Pollutant (HAP): 8 tons per consecutive twelve (12) month period; and,
- i. 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 equipment shall not be operated without this equipment's ducted exhaust being directed to atmosphere through the completed common unit chimney (C009709).

[District Rule 1302]

9.This equipment shall not be operated without this equipment's ducted exhaust being directed to atmosphere through the completed common unit chimney (C009709).

[District Rule 1302]

10.The extruder process shall not be operated without the Wenger Preconditioner Vent Control System in operation.

[District Rule 1302]

10.The extruder process shall not be operated without the Wenger Preconditioner Vent Control System in operation.

[District Rule 1302]

11.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]

11.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]