



# 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

B011676

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:

PET FOOD PACKAGING RE-FEED SYSTEM consisting of: Pneumatic pet food packaging system to allow mis-packaged pet food to be directly returned to the packaging hopper for immediate re-packaging. Each kibble filter receiver is located over one of the six packaging line hoppers. Each filter receiver has a control efficiency of 99 percent for PM10. Equipment previously Permitted as B008779 under emissions control of Permit C008762. Facility elevation is 2930 feet above sea level.

### EQUIPMENT

Capacity	Equipment Description
20	Two (2) Blowers (10 hp each).
0	Six (6) Feed Hoppers.
0	Six (6) Kibble Filter Receivers, Model CP3000VP-TE, Pulse Jet Type. Each Filter Receiver is Equipped With One 18" PTFE-Coated Poly Felt bag

### 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]

Fee Schedule: 1 (a)

Rating: 1 bhp

SIC: 2047

SCC: 30200506

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

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]

4. This equipment shall discharge no more than 0.000008 pounds per ton of material processed of PM10 at the operating conditions given in the above description (BACT). This equipment does not require a regularly scheduled emission compliance test. However, emission compliance testing may be required at the discretion of the District.

[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:

- a. Monthly facility finished production, in pounds or tons;
- b. Monthly facility re-packaged finished product, in pounds or tons, and
- c. 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 rolling 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 (SOx): 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. A pressure differential gauge shall be installed and maintained on this equipment. In operation the pressure differential shall not exceed 0.25 inches water column.

[District Rule 1302]

10. When in operation, each kibble packaging re-feed process must be vented to an integrally attached kibble filter receiver air pollution control device.

[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]