



# 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

B008780

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, TN 37067

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

Mars Petcare  
13243 Nutro Way  
Victorville, CA 92392

#### Description:

PROCESS LINE #1 consisting of: Weighing, conveying, conditioning, extruding, drying/cooling, sizing, coating, and final cooling equipment. This permit includes equipment that is common to Process Lines #1, #2 and #3. 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 0.01908 // Surge Bin Roto Motor #510 (7.5 hp; 19080 Btu/hr) 0.007632 // Screw Feeder, 9" D by 84" #511 (3 hp; 7632 Btu/hr) 0.076320 // Conditioning Cylinder #512 (30 hp; 76320 Btu/hr) 1.2 // Extruder Intake Air Conditioning System (1.2 MMBtu/hr) 1.017600 // Extruder #513 (400 hp; 1017600 Btu/hr) 0.012720 // Extruder Knife Assembly #514 (5 hp; 12720 Btu/hr) 0.190800 // Vacuum Conveying System #515 through #519 (75 hp; 190800 Btu/hr) 0.015264 // Two Dryer/Cooler Product Conveyors, Top and Bottom Pass 120" W #522 (3 hp each; 15264 Btu/hr) 0.063600 // Cooler Intake Fan #522 (25 hp; 63600 Btu/hr) 12 // Four Eclipse Model WX300 3 MMBtu/hr Dryer Burners #522 (12 MMBtu/hr total) 0.5 // Eclipse Model AH050 Cooler Burner #522 (0.5 MMBtu/hr) 0.050880 // Four Dryer Combustion Air Fans #522 (5 hp each; 50880 Btu/hr) 0.007632 // Three Dryer Agitators #522 (1 hp each; 7632 Btu/hr) 0.203520 // Eight Dryer Recirculating Fans #522 (10 hp each; 203520 Btu/hr) 0.025440 // Cooler to Dryer Recirculating Fan #522 (10 hp; 25440 Btu/hr) 0.003358 // Four Dryer/Cooler Fines Screw Conveyors #522 (0.33 hp each; 3358.08 Btu/hr) 0.019080 // Screw Conveyor #522 (7.5 hp; 19080 Btu/hr) 0.002544 // Two Airlocks #529, #530 (0.5 hp each; 2544 Btu/hr) 0.007632 // Vibrating Conveyor 24" by 8" by 17'6" #533 (3 hp; 7632 Btu/hr) 0.019080 // Bucket Elevator #1 #534 (7.5 hp; 19080 Btu/hr) 0.050880 // Pressure Blower Package #11 #537 (20 hp; 50880 Btu/hr) 0.001272 // 6" Pneumatic Conveying Line Airlock #522.70 (0.5 hp; 1272 Btu/hr) 0 // Two Dry Product Holding Bins #601, #602 (1691 cubic feet each) 0 // Vibratory Feeders 30" by 6" by 8' L #604, #605 0.017808 // Two Deck Screen #607 (3 hp) with 0.5 hp airlock #539; 17808 Btu/hr 0 // Weigh Belt Feeder #610 0.005088 // Vibratory Pan Conveyor #611 (2 hp; 5088 Btu/hr) 0.048336 // Mist Coater System #612 (19 hp total; 48336 Btu/hr) 0.006360 // Oil/Fat Pump System (2.5 hp; 6360 Btu/hr) 0.038160 // Liquid System (15 hp total; 38160 Btu/hr) 0.038160 // Flavoring System Vacuum Blower #613 (15 hp; 38160 Btu/hr) 0.001272 // Dry Flavoring Airlock #613 (0.5 hp; 1272 Btu/hr) 0.007632 // Vibratory Conveyor 30" by 7" by 16'4" L #625 (3 hp; 7632 Btu/hr) 0.019080 // Bucket Conveyor #2 #626 (7.5 hp; 19080 Btu/hr) 0.012720 // Cooler Infeed Drag Conveyor #3702 (5 hp; 12720 Btu/hr) 0 // Wegner Preconditioner V0ent Control System #522 0 // Geelen Cooler 28x28 #3706 0.002544 // Cooler Product Inlet Vale #3706.01 (1 hp; 2544 Btu/hr) 0.031164 // Packaging System (12.25 hp total; 31164 Btu/hr) 0.008160 // Cooler Rotating Rairburner #3706.10 (0.33 hp; 840 Btu/hr) 0.007632 // Cooler Discharge Drag Conveyor #3706.11 (7.5 hp; 19080 Btu/hr) 0.008160 // Cooler Rotating Rairburner #3706.12 (0.33 hp; 840 Btu/hr) 0.007632 // Cooler Discharge Drag Conveyor #3706.13 (7.5 hp; 19080 Btu/hr)

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**  
**Brad Poiriez**  
Air Pollution Control Officer

Btu/hr) 0.007632 // Cooler Hydraulic Discharger #3706.30 (3 hp; 7632 Btu/hr) 0 // Cooler Cyclone #3710 0.001272 // Cooler Cyclone Fines Valve #3710.01 (0.5 hp; 1272 Btu/hr) 0 // Cooler Fines BFM Flexible Fitting #3710.20 0 // Cooler Fines Diverter #3710.60 0 // Cooler Exhaust Air Filter #3712 0.190800 // Cooler Exhaust Fan #3714 (75 hp; 190800 Btu/hr) 0.161544 // Process Liquid Handling System (63.5 hp total; 161544 Btu/hr) Drag conveyors to packaging bins 0.0 // The following equipment is common to process lines #1, #2, and #3: 0.161544 // Process Liquid Handling System (63.5 hp total; 161544 Btu/hr) 0 // The following equipment is common to process lines #1 and #2: 0.814080 // IONO2X 1&2 Odor Treatment System #3820 (320 hp total; 814080 Btu/hr); Permitted as C013997 0.381600 // IONO2X 1&2 Exhaust Fan #3822 (150 hp; 381600 Btu/hr) 0 // IONO2X 1&2 Exhaust Damper ===

## 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:

- a. 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.
- 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]

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): C008773, C009322, C009323, C009709, C009712, C013995, and C013997.  
[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): C008773, C009322, C009323, C009709, C009712, C013995, and C013997.  
[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 be provided to District personnel upon request:  
a. Monthly facility finished production, in pounds or tons  
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 be provided to District personnel upon request:  
a. Monthly facility finished production, in pounds or tons  
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.This equipment shall not be operated without this equipment's ducted exhaust being directed to atmosphere through the common unit chimney (C009709).  
[District Rule 1302]

8.This equipment shall not be operated without this equipment's ducted exhaust being directed to atmosphere through the common unit chimney (C009709).  
[District Rule 1302]

9.The extruder process shall not be operated without the Wenger Preconditioner Vent Control System in operation.  
[District Rule 1302]

9.The extruder process shall not be operated without the Wenger Preconditioner Vent Control System in operation.  
[District Rule 1302]

10.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]

10. 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]

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]