



## 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

B010727

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:**

BOILER, NATURAL GAS (#2) consisting of: Cleaver-Brooks Model CB-700-350-150ST, Serial Number T1387-1-2 with a maximum heat input of 15,001 MMBtu/hr, equipped with a Low NOX Burner and Flue Gas Recirculation with a maximum natural gas fuel usage rate of 14,287 cubic feet per hour. Facility elevation is 2930 feet above sea level.

#### **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 operator shall maintain a log for this equipment, which, at a minimum, contains the information specified below. This log shall be maintained current and on-site for a minimum of two (2) years and shall be provided to District personnel on request:  
a. Cumulative annual fuel use in cubic feet or operation in hours; and,  
b. Annual tune-up verification.  
[District Rule 1302]

3. Prior to the expiration date each year, the owner operator shall have this equipment tuned, as specified by Rule 1157(I), Tuning Procedure.  
[District Rule 1302]

Fee Schedule: 2 (e)      Rating: 15000000 Btu      SIC: 2047      SCC: 10300602      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**  
**Brad Poiriez**  
Air Pollution Control Officer

4.This equipment shall be exclusively fueled with pipeline quality natural gas with a sulfur content not exceeding 1.0 grains per 100 dscf on a rolling twelve-month average basis. Compliance with this limit shall be demonstrated by providing evidence of a contract, tariff sheet or other approved documentation that shows that the fuel meets the definition of pipeline quality gas.

[District Rule 1302(C)(2)(a)]

5.This boiler is subject to Rule 1157 RACT Standards as it is a new boiler and qualifies as a high annual heat input unit as defined in Rule 1157(B)(h); a permit unit with an annual heat input greater than or equal to 50,000 million Btu (MMBtu); BACT requirements for NOx are also required, therefore; this unit shall not emit:

- a. Carbon Monoxide in excess of 100 ppmv @3% Oxygen; and
- b. NOx in excess of 9 ppmv, and/or 0.0109 lbs/MMBtu of heat input @3% Oxygen.

[District Rule 1157]

6.Emission Compliance Testing, frequency:

This permit unit shall demonstrate compliance through emission compliance testing not less than once every 12 months, unless this unit was not operated during the previous 12 months; compliance testing shall occur no later than 90 days after start up following any periods of curtailed operations. The facility shall maintain records of operation regarding Boiler usage; including the operation of any rental units. These records shall be kept for no less than five years and made available to District personnel upon request.

[District Rule 1157]

7.Emission Compliance Testing (Rule 1157(E)(1)(b)), Procedures:

- (i) Compliance testing shall follow the administrative procedures outlined in the District's Compliance Test Procedural Manual. All emission determinations shall be made as stipulated in the test protocol accepted by the District.
- (ii) Emission determinations shall include, at a minimum, one emission compliance test conducted at 90% of the maximum firing rate allowed by the District permit or at normal operating conditions as determined and approved by the APCO.
- (iii) No compliance determination shall be established based on data obtained from compliance testing, including integrated sampling methods, during a start-up period or shut-down period.
- (iv) All ppmv emission limits specified shall be referenced at dry stack-gas conditions and 3.0 percent by volume stack-gas oxygen.
- (v) All lbs/MMBtu NOx emission rates shall be calculated as pounds of nitrogen dioxide per MMBtu of heat input.
- (vi) All emission concentrations and emission rates shall be based on hourly averages.

[District Rule 1302]

8.Records and Reporting (Rule 1157(E)(2)):

The owners operators shall monitor and record for each permit the HHV and cumulative annual usage of fuel. The cumulative annual usage of fuel shall be monitored from utility service meters, purchase or tank fill records, or by any other acceptable methods, as approved by the Air Pollution Control Officer. A statement of the heat input for the previous calendar year shall be submitted to the District by May 31st of each year; reports shall be submitted via e-mail to [reporting@mdaqmd.ca.gov](mailto:reporting@mdaqmd.ca.gov).

[District Rule 1302]

9.Test Methods (Rule 1157(F)):

a. Compliance with the NOx, carbon monoxide and oxygen requirements shall be determined using the following test methods:

1. Oxides of Nitrogen - EPA Method 7E or ARB Method 100
2. Carbon Monoxide - EPA Method 10 or ARB Method 100
3. Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100
4. NOx Emission Rate (Heat Input Basis) - EPA Method 19

b. HHV determination shall be by one of the following test methods:

1. ASTM D 2015-85 for solid fuels; or
2. ASTM D 240-87 or ASTM D 2382-88 for liquid hydrocarbon fuels; or
3. ASTM D 1826-88, or ASTM D 1945-81 in conjunction with ASTM D3588-89 for gaseous fuels; or
4. as provided by the fuel supplier.

[District Rules 1157 and 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 (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]

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]