

**STANDARD PERMIT APPLICATION**  
**Air Permit Renewal**

**Subject Facility:**

Nestlé Purina PetCare Company  
Pet Food Manufacturing Facility  
4700 East Nestlé Purina Avenue  
Flagstaff, AZ 86004

Air Quality Permit No.: 74605 Rev 97833  
LTF ID No.: 1001585  
Place ID: 2318

**Regulatory Agency:**

Arizona Department of Environmental Quality  
Office of Air Quality  
1110 W. Washington Street  
Phoenix, AZ 85007

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**SECTION I**


**STANDARD PERMIT APPLICATION FORM**

SECTION 3.1  
**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
Air Quality Division  
1110 West Washington • Phoenix, AZ 85007 • Phone: (602) 771-2338

**STANDARD CLASS II PERMIT APPLICATION FORM**  
(As required by A.R.S. § 49-426, and Chapter 2, Article 3, Arizona Administrative Code)

1. Permit to be issued to (Business license name of organization that is to receive permit):  
Nestle Purina Petcare Company
2. Mailing Address: 4700 E Nestle Purina Ave  
City: Flagstaff State: Arizona ZIP: 86004
3. Name (or names) of Responsible Official: Jake Donley  
Phone: 928.714.5750 Fax: \_\_\_\_\_ Email: jake.donley@purina.nestle.com
4. Facility Manager/Contact Person and Title: Ramon Martinez  
Phone: 928.714.5700 Fax: \_\_\_\_\_ Email: ramon.martinez@purina.nestle.com
5. Facility Name: Nestle Purina Petcare - Place ID: 2318  
Facility Location/Address (Current/Proposed): 4700 E Nestle Purina Ave  
City: Flagstaff County: Coconino ZIP: 86004  
Indian Reservation (if applicable, which one): N/A  
Latitude/Longitude, Elevation: 35.2200N, 111.5748 W, 6790'
6. General Nature of Business: Petfood Manufacturing
7. Type of Organization:  
 Corporation     Individual Owner     Partnership     Government Entity     LLC  
 Other \_\_\_\_\_
8. Permit Application Basis:  New Source     Revision     Renewal of Existing Permit  
For renewal or modification, include existing permit number (and exp. date): 74605 (Apr 8, 2024)  
Date of Commencement of Construction or Modification: \_\_\_\_\_  
Primary Standard Industrial Classification Code: \_\_\_\_\_
9. I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by ADEQ as public record. I also attest that I am in compliance with the applicable requirements of the Permit and will continue to comply with such requirements and any future requirements that become effective during the life of the Permit. I will present a certification of compliance to ADEQ no less than annually and more frequently if specified by ADEQ. I further state that

I will assume responsibility for the construction, modification, or operation of the source in accordance with Arizona Administrative Code, Title 18, Chapter 2 and any permit issued thereof.

Signature of Responsible Official: 

Printed Name of Signer/Official Title: Jake Donley

Date: 9/13/2023 Telephone Number: 928.714.5750

**SECTION IV**  
**EMISSIONS CALCULATION WORKSHEETS WITH**  
**INSIGNIFICANT ACTIVITIES**

**SEE ATTACHED FOR EMISSIONS DATA**

SECTION V  
**COMPLIANCE OVERVIEW**

- A. Applicable Rules and Proposed Exemptions from Otherwise Applicable Rules
- B. Compliance Schedule

<b>Arizona Regulatory Citation</b>		<b>Applicable</b>	<b>Proposed Exemption</b>	<b>Comments</b>
<b>Article 1</b>	General Provisions	Yes		All permitted sources are affected by the provisions of this article.
<b>Article 2</b>	Ambient Air Quality Standards; Area Designations; Classifications	Yes		All permitted sources are affected by the provisions of this article.
<b>Article 3</b>	Permits and Permit Revisions	Yes		All permitted sources are affected by most of the provisions of this article. Article 3 requirements which do not apply are identified below.
R18-2-306.02	Establishment of an Emissions Cap	No		
R18-2-317	Facility Changes Allowed Without Permit Revisions – Class I	No		
R18-2-324	Portable sources	No		
R18-2-329	Permits containing the terms and conditions of federal delayed compliance Orders (DCO) or consent decrees	No		
R18-2-333	Acid Rain	No		
<b>Article 4</b>	Permit Requirements for New Major sources and Major Modifications to Existing Major Sources	No		
<b>Article 5</b>	General Permits	No		



Arizona Regulatory Citation		Applicable	Proposed Exemption	Comments
<b>Article 6</b>	Emissions from Existing and New Nonpoint Sources	Yes		All permitted sources are affected by most of the provisions of this article. Article 6 requirements which do not apply are identified below.
R18-2-607	Storage piles	No		
R18-2-608	Mineral tailings	No		
R18-2-609	Agricultural practices	No		
R18-2-610	Definitions for R18-2-610.01	No		
R18-2-610.01	Agricultural PM 10 General permit; Maricopa PM 10 Nonattainment Area	No		
R18-2-611	Definitions for R18-2-611.01	No		
R18-2-611.01	Animal Operations PM10 General Permit; Moderate and Serious PM10 Nonattainment Areas Except Yuma County	No		
R18-2-613	Definitions for R18-2-613.01	No		
R18-2-613.01	Yuma PM10 Nonattainment Area; Agricultural Best Management Practices	No		

Arizona Regulatory Citation		Applicable	Proposed Exemption	Comments
<b>Article 7</b>	Existing Stationary Source Performance Standards	Yes		All permitted sources are affected by certain provisions of this article. Article 7 requirements which are not applicable are identified as such.
R18-2-703	Standards of performance for Existing fossil-fuel fired steam generators and general fuel burning equipment		X	EP-10 and EP-11 (Boilers) are affected by R18-2-724.
R18-2-704	Standards of performance for Incinerators	No		
R18-2-705	Standards of performance for Existing portland cement plants	No		
R18-2-706	Standards of performance for Existing nitric acid plants	No		
R18-2-707	Standards of performance for Existing sulfuric acid plants	No		
R18-2-708	Standards of performance for Existing asphalt concrete plants	No		
R18-2-709	Standards of performance for Existing petroleum refineries	No		
R18-2-710	Standards of performance for Existing storage vessels for petroleum liquids		X	Sources EP-22 and EP-23 (currently not in use) are petroleum liquid storage tanks that are greater than 40,000 gallons in size. These sources are exempt from the referenced requirement because the vapor pressures of the petroleum liquids are below regulatory thresholds.

Arizona Regulatory Citation	Applicable	Proposed Exemption	Comments
R18-2-711 Standards of Performance for Existing Secondary Lead Smelters	No		
R18-2-712 Standards of Performance for Existing Secondary Brass and Bronze Ingot Production Plants	No		
R18-2-713 Standards of Performance for Existing Iron and Steel Plants	No		
R18-2-714 Standards of performance for Existing sewage treatment plants	No		
R18-2-715 Standards of performance for existing primary copper smelters; site-specific requirements	No		
R18-2-715.01 Standards of performance for Existing primary copper Smelters; compliance and Monitoring	No		
R18-2-715.02 Standards of performance for existing primary copper smelters; fugitive emissions	No		
R18-2-716 Standards of performance for existing coal preparation plants	No		

Arizona Regulatory Citation	Applicable	Proposed Exemption	Comments
R18-2-717 Standards of performance for steel plants; existing electric arc furnaces (EAF)	No		
R18-2-719 Standards of performance for existing stationary rotating machinery		X	Internal combustion engines in use at the plant fall under the regulatory definition of "insignificant activities." See Section VI of this application.
R18-2-720 Standards of performance for existing lime manufacturing plants	No		
R18-2-721 Standards of performance for existing nonferrous metals industry sources	No		
R18-2-722 Standards of performance for existing gravel or crushed stone processing plants	No		
R18-2-723 Standards of performance for existing concrete batch plants	No		
R18-2-724 Standards of Performance for Fossil-fuel Fired Industrial and Commercial Equipment	Yes		Applies to North and South Boilers (EP-10 and EP-11) only.
R18-2-725 Standards of performance for existing dry cleaning plants	No		
R18-2-726 Standards of performance for sandblasting operations	No		
R18-2-727 Standards of performance for spray painting operations	No		
R18-2-728 Standards of performance for existing ammonium sulfide manufacturing plants	No		

Arizona Regulatory Citation	Applicable	Proposed Exemption	Comments
R18-2-729 Standards of performance for cotton gins	No		
R18-2-730 Standards of performance for Unclassified sources	Yes		Applies to all plant sources, except fuel oil tanks (EP-22 and EP-23) and boilers (EP-10 and EP-11).
R18-2-731 Standards of performance for existing municipal solid waste landfills	No		
R18-2-732 Standards of performance for existing hospital/medical/ infectious waste incinerators	No		
R18-2-733 Incorporation of Federal Standards of Performance for Mercury Emissions from Coal-Fired Electric Steam Generating Units	No		
R18-2-733.01 Additional Mercury Allowance Acquisition Requirements for Coal-Fired Electric Steam Generating Units	No		
R18-2-734 State Standards of Performance for Mercury Emissions from Coal-Fired Electric Steam Generating Units	No		
<b>Article 8</b> Emissions from Mobile Sources	No		
<b>Article 9</b> New Source Performance Standards	No		

Arizona Regulatory Citation	Applicable	Proposed Exemption	Comments
Article 10 Motor Vehicles Inspection & Maintenance	No		
Article 11 Federal Hazardous Air Pollutants	No		
Article 13 Diesel Conversion Grant Program	No		
Article 14 Conformity Determinations	No		
Article 15 Forest and Range Management Burns	No		
Article 16 Visibility; Regional Haze	No		
Article 17 Arizona State Hazardous Air Pollutants Program	No		

Arizona regulation R18-2-309(5)(c)(i thru iii), (d), and (6) describes the requirements of a compliance schedule as follows:

- (c)(i) For applicable requirements with which the source is in compliance, a statement that the source will continue to comply with such requirements.

*See Section VIII of this application for certification statement.*

- (c)(ii) For applicable requirements that will become effective during the permit term, a statement that the source will meet such requirements on a timely basis. A statement that the source will meet in a timely manner applicable requirements that become effective during the permit term shall satisfy this provision, unless a more detailed schedule is expressly required by the applicable requirement.

*See Section VIII of this application for certification statement.*

- (c)(iii) A schedule of compliance for sources that are not in compliance with all applicable requirements at the time of permit issuance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.

*Not believed to be applicable at the time of this application.*

- (d) A schedule for submission of certified progress reports no less frequently than every 6 months for sources required to have a schedule of compliance to remedy a violation.

*Not believed to be applicable at the time of this application.*

6. The compliance plan content requirements specified in this paragraph shall apply and be included in the acid rain portion of a compliance plan for an affected source, except as specifically superseded by regulations promulgated under Title IV of the Act with regard to the schedule and method(s) the source will use to achieve compliance with the acid rain emissions limitations.

*Acid Rain provisions are not believed to be applicable.*

**SECTION VI**  
**PROPOSED REVISIONS TO PERMIT CONDITIONS**



No revised permit conditions proposed for this permit renewal. Any comments or questions will be addressed during draft permit review.

**SECTION VII  
COMPLIANCE CERTIFICATION**

I hereby certify that:

1. The subject facility is operating in accordance with the applicable requirements, as modified by the proposed exemptions outlined in Section V.A of this Air Permit Application.
2. The subject facility will make every attempt to identify and comply with any requirements that become applicable during the term of this permit.
3. The subject facility operates within the constraints of the existing permit, as modified by the Proposed Revisions to Permit Conditions set forth in Section VI of this Air Permit Application.
4. Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Date: \_\_\_\_\_ 10/3/2023 \_\_\_\_\_

Signature of Responsible Official:

A handwritten signature in black ink that reads "Ramon Martinez". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Ramon Martinez - Plant Manager

<b>Facility Name:</b> Nestlé Purina PetCare Company	<b>Location:</b> Flagstaff, AZ	<b>Year:</b> 2023
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**SUMMARY OF MAXIMUM POTENTIAL EMISSIONS FOR EACH EMISSION POINT**

Stack I.D. No.	Emission Point Description	TSP		PM10		PM2.5		SOx		NOx		VOC		CO		HAP's	
		lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
1	TRUCK RECEIVING - DUST COLLECTOR #7	1.37	5.98	0.22	0.96	0.027	0.120	-	-	-	-	-	-	-	-	-	-
2	RAIL RECEIVING - DUST COLLECTOR #24	0.09	0.39	0.01	0.06	0.002	0.008	-	-	-	-	-	-	-	-	-	-
3	GRINDING ASPIRATION - DUST COLLECTOR #156	0.05	0.24	0.046	0.20	0.025	0.111	-	-	-	-	-	-	-	-	-	-
4	GRINDING ASPIRATION - DUST COLLECTOR #237	0.07	0.31	0.06	0.26	0.032	0.14	-	-	-	-	-	-	-	-	-	-
5	BY-PRODUCT DRYER (FAN #1958)	1.20	5.26	0.73	3.21	0.28	1.21	-	-	-	-	-	-	-	-	-	-
6	DRYER #1 (FAN #1520) NATURAL GAS	0.24	1.05	0.16	0.68	0.11	0.48	0.01	0.05	1.75	7.67	0.10	0.42	1.47	6.44	0.03	0.14
7	DRYER #2 (FAN #1098)	0.17	0.74	0.11	0.48	0.08	0.34	-	-	-	-	-	-	-	-	-	-
8	DRYER #3 (FAN #1198)	0.17	0.74	0.11	0.48	0.08	0.34	-	-	-	-	-	-	-	-	-	-
9	DRYER #4 (FAN #1298)	0.17	0.74	0.11	0.48	0.078	0.34	-	-	-	-	-	-	-	-	-	-
10	BOILER #7082 - NATURAL GAS BOILER	0.58	2.14	0.58	2.14	0.48	2.12	0.04	0.67	6.37	28.05	0.35	1.54	5.35	23.48	0.12	0.53
11	BOILER #7105 - NATURAL GAS BOILER	0.48	1.59	0.48	1.59	0.36	1.58	0.03	0.54	4.75	20.94	0.26	1.15	3.99	17.52	0.09	0.39
12	LIVE BOTTOM BIN ASPIRATION - DUST COLLECTOR FAN #1039	0.56	2.44	0.47	2.05	0.26	1.12	-	-	-	-	-	-	-	-	-	-
13	DRYER LEGS ASPIRATION - DUST COLLECTOR FAN #1029	0.56	2.44	0.47	2.05	0.26	1.12	-	-	-	-	-	-	-	-	-	-
14	LBB LEGS/ROTEX ASPIRATION - DUST COLLECTOR FAN #1005	0.56	2.44	0.47	2.05	0.26	1.12	-	-	-	-	-	-	-	-	-	-
19	FP COOLER SYSTEM #1 CYCLONE (PLANT ID #3513)	0.76	3.31	0.49	2.15	0.35	1.52	-	-	-	-	-	-	-	-	-	-
20	FP COOLER SYSTEM #2 CYCLONE (PLANT ID #3523)	0.76	3.31	0.49	2.15	0.35	1.52	-	-	-	-	-	-	-	-	-	-
21	FP COOLER SYSTEM #4 CYCLONE (PLANT ID #2460)	1.13	4.97	0.74	3.23	0.52	2.28	-	-	-	-	-	-	-	-	-	-
22	RESIDUAL OIL STORAGE - TANK #1 [Taken out of service]	-	-	-	-	-	-	-	-	-	-	0.13	0.56	-	-	-	-
23	RESIDUAL OIL STORAGE - TANK #2 [Taken out of service]	-	-	-	-	-	-	-	-	-	-	0.13	0.56	-	-	-	-
24	ODD-POUND INGREDIENT STORAGE SILO #1 (PLANT ID #659)	0.02	0.092	0.0128	0.0561	0.00483	0.0212	-	-	-	-	-	-	-	-	-	-
25	ODD-POUND INGREDIENT STORAGE SILO #2 (PLANT ID #658)	0.02	0.092	0.0128	0.0561	0.00483	0.0212	-	-	-	-	-	-	-	-	-	-
26	GRINDING ASPIRATION - DUST COLLECTOR #741	0.07	0.31	0.06	0.26	0.03	0.14	-	-	-	-	-	-	-	-	-	-
27	DRYER #5 (FAN #1400) NATURAL GAS	0.23	0.99	0.15	0.64	0.104	0.45	0.010	0.04	1.71	7.49	0.09	0.41	1.44	6.29	0.03	0.14
29	FP COOLER SYSTEM #3 CYCLONE (PLANT ID #1884)	0.57	2.50	0.35	1.52	0.13	0.57	-	-	-	-	-	-	-	-	-	-
30	BANK 5 MIXED MEAL DUST COLLECTOR #728 - 3rd FLOOR	0.005	0.020	0.004	0.017	0.0021	0.0092	-	-	-	-	-	-	-	-	-	-
31a	MILL BLDG 5TH FLR LOUVERED VENT (NORTH) - EP31a	0.15	0.67	0.100	0.44	0.07	0.31	-	-	-	-	-	-	-	-	-	-
31b	MILL BLDG 5TH FLR LOUVERED VENT (NORTH) - EP31b	0.15	0.67	0.10	0.44	0.07	0.31	-	-	-	-	-	-	-	-	-	-
31c	MILL BLDG 5TH FLR LOUVERED VENT (NORTH) - EP31c	0.001	0.004	0.0002	0.0007	0.0000	0.00008	-	-	-	-	-	-	-	-	-	-
32a	MILL BLDG 5TH FLR LOUVERED VENT (SOUTH) - EP32a	0.15	0.67	0.100	0.44	0.071	0.310	-	-	-	-	-	-	-	-	-	-
32b	MILL BLDG 5TH FLR LOUVERED VENT (NORTH) - EP32b	0.15	0.67	0.10	0.44	0.071	0.31	-	-	-	-	-	-	-	-	-	-
32c	MILL BLDG 5TH FLR LOUVERED VENT (SOUTH) - EP32c	0.000	0.000	0.0002	0.0007	0.00002	0.0001	-	-	-	-	-	-	-	-	-	-
33	COATINGS - DUST COLLECTOR #123	0.06	0.253	0.038	0.17	0.018	0.078	-	-	-	-	-	-	-	-	-	-
34	DA MIXER SYSTEM #1 CYCLONE (PLANT ID #687)	0.76	3.311	0.49	2.15	0.35	1.52	-	-	-	-	-	-	-	-	-	-
35	DA MIXER SYSTEM #2 CYCLONE (PLANT ID #690)	0.76	3.311	0.49	2.15	0.35	1.52	-	-	-	-	-	-	-	-	-	-
36	DA MIXER SYSTEM #3 CYCLONE (PLANT ID #697)	1.13	4.967	0.74	3.23	0.52	2.28	-	-	-	-	-	-	-	-	-	-
37	DA MIXER SYSTEM #4 CYCLONE (PLANT ID #694)	1.13	4.967	0.74	3.23	0.52	2.28	-	-	-	-	-	-	-	-	-	-
38	BATCHING DUST COLLECTOR #598	0.004	0.017	0.003	0.014	0.0018	0.0077	-	-	-	-	-	-	-	-	-	-
39	EXTRUSION UNITS 1 - 5; PNEUMATIC CONVEYANCE CYCLONES #S 966, 1066, 1166, 1266 & 1373	1.050	4.599	0.641	2.805	0.2415	1.0578	-	-	-	-	-	-	-	-	-	-
40	DRYER #1 CONVEYANCE - DUST COLLECTOR FAN #1527	0.74	3.25	0.62	2.73	0.34	1.50	-	-	-	-	-	-	-	-	-	-
INSIG-1	FIRE WATER PUMP ENGINE (Diesel Fuel)		0.006		0.006		0.006		0.006		0.087		0.007		0.019		0.000
INSIG-2	DELCO GENERATOR ENGINE SET (Diesel Fuel)		0.00		0.00		0.00		0.001		0.018		0.001		0.004		0.000
INSIG-3	ONAN GENERATOR ENGINE SET (Natural Gas)		0.0006		0.0006		0.0006		0.00005		0.008		0.0004		0.007		0.000
INSIG-4	PARTS WASHER DATE CODERS		-		-		-		-		-		0.04		-		-
INSIG-5	PNEUMATIC PACKAGING TAILINGS CONVEYANCE CYCLONE		0.009		0.001		0.006		0.000		0.000						
SP HEAT	SPACE HEATING (Propane)		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.000
<b>Page Total</b>			<b>69.49</b>		<b>45.01</b>		<b>28.22</b>		<b>1.31</b>		<b>64.26</b>		<b>4.68</b>		<b>53.76</b>		<b>1.20</b>