



## MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

### AUTHORITY TO CONSTRUCT

C001940

If construction is not completed by the expiration date of this permit, it may be renewed for one additional year upon payment of applicable fees. Any additional extension will require the written approval of the Air Pollution Control Officer. This Authority to Construct may serve as a temporary Permit to Operate provided the APCO is given prior notice of intent to operate and the Permit to Operate is not specifically denied.

**EXPIRES LAST DAY OF: FEBRUARY 2026**

#### OWNER OF OPERATOR (Co. #2349)

MP Mine Operations LLC  
67750 Bailey Road  
Mountain Pass, CA 92366

#### EQUIPMENT LOCATION (Fac. #364)

Mountain Pass Mine  
67750 Bailey Road  
Mountain Pass, CA 92366

#### Description:

SCRUBBER, BACK FUME WET SCRUBBER consisting of: a TFI International chlorine fume scrubber serving the HCl leach tanks under B001941 as well as the membrane filter press under B001938. Design specifications are as follows: 3910 CFM flowrate @ 2797 ft/min velocity; ID Exhaust Fan, motor 20; 80 degrees Fahrenheit operating temperature; Scrubber is 14 inches in diameter and 63 ft high; and Scrubber Solution Return Pump is rated at 10 hp.

#### CONDITIONS:

1. This scrubber shall be operated and maintained in strict accord with the recommendations of the manufacturer/supplier and/or sound engineering principles consistent with minimum emissions of contaminants.
2. A log of all maintenance and repairs/replacements shall be kept for this equipment.
3. This air pollution control device shall have a minimum control efficiency of 98.0%.
4. Water shall be used as the scrubbing solution in this equipment. The effluent gas from this control equipment shall be maintained below 266 ppmv HCL. The concentration in the gas shall be back calculated based on titrations of the scrubbing solution. A sample shall be collected and titrated a minimum of three (3) times per shift. The results of the titrations shall be recorded and the gas concentration shall be calculated and recorded.

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 1099

SCC: 99999999

Location/UTM(Km): 634E/3926N

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.

MP Mine Operations LLC  
1700 S. Pavilion Center Drive, 8th Floor  
Las Vegas, NV 89135

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

5.Logs mentioned in the above conditions shall be kept current, on-site for a minimum of 5 years and provided to District personnel on request.

6.Mountain Pass Mine Voluntary Emissions Limit/Synthetic Minor Hazardous Air Pollutant Limits:

(a). General Limits for Entire Facility. The total emissions for the Mountain Pass Mine shall be less than 25 tons per year of VOC. The total emissions of Hazardous Air Pollutants (HAPs) for the Mountain Pass Mine shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs calculated on an annual basis. HAPs are defined in 40 CFR 61.01 Lists of pollutants and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

(b). Monitoring, Periodic Monitoring & Recordkeeping Conditions. To prove compliance with condition (a) above, permittee shall maintain usage records of all VOC- and HAP-containing solvent materials. Such records shall be compiled into an annual usage report and total HAP emissions from solvent operations shall be added to the annual HAP emissions from fuel burning and other HAP emitting equipment. Annual HAP/VOC emissions from fuel burning and other emitting equipment for purposes of this condition shall be determined by use of HAP/VOC emissions factors (as set forth by District approved emission factors), or by annual actual emissions as determined by source test of the equipment, or by methods and emission factors established in an approved comprehensive Emission Inventory Plan (CEIP).

(c) A facility wide Comprehensive Emission Inventory (CEIR) for all emitted criteria and toxic air pollutant must submit to the District, in a format approved by the District, on a yearly basis, which is to be received by the District no later than May 31 of the following year.

[40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements]

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 43 FR 52237; Current Rule Version = 07/25/77]

[California Clean Air Act, Health and Safety Code \S\S39607 and \S\S44300 et seq., and the Federal Clean Air Act, \S110(a)(2)(F)(ii), codified in 40 CFR 60 Subpart Q]