



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

C011607

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:

HCl SCRUBBER - VENTING TANK FARM consisting of: 90% control efficiency

EQUIPMENT

Capacity	Equipment Description
0	J80-SSE111 HCl SCRUBBER COLUMN
0	J80-TK111 HCl SCRUBBER TANK 200 gallon
0	J80-P111 HCl SCRUBBER RECIRC PUMP
0	J80-P113 HCl SCRUBBER RECIRC PUMP (SPARE)
0	J80-HX111 HCl SCRUBBER HEATER
0	J80-STK111 HCl SCRUBBER STACK

CONDITIONS:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 1099

SCC: N/A

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

2.This equipment shall be operated and maintained in strict accord with the recommendations of the manufacturer or supplier and/or sound engineering principles.

3.Any modifications and/or substantial changes to the design of the equipment listed above, which causes a change in the emissions to the atmosphere shall be submitted to the District for approval prior to the changes.

4.This equipment shall be operated concurrently with the following components associated with the Tank Farm under valid permit T011606:

- a. J80-TK110 HCl storage tank, 30,000 gallon capacity
- b. J80-TK112 HCl storage tank, 30,000 gallon capacity
- c. J80-TK114 HCl storage tank, 30,000 gallon capacity
- d. J80-TK116 HCl storage tank, 30,000 gallon capacity
- e. J80-TK118 HCl storage tank, 158,000 gallon capacity
- f. J80-TK120 HCl storage tank, 158,000 gallon capacity

5.A log of all maintenance and repairs/replacements shall be kept for this equipment. Logs shall be kept current, on-site for a minimum of 5 years and provided to District personnel on request.

6.This scrubber shall not discharge hydrogen chloride at more than a maximum of 800 ppm v/v, per District rule 406. To demonstrate compliance with this limit, the owner/operator, o/o, shall demonstrate that the HCl concentration in the liquid shall remain at or below an HCl concentration of 37% in the HCl storage tank.

The concentration shall be estimated weekly according to a district approved protocol, with results logged. The log shall be maintained current, kept on-site for a minimum of 5 years, and provided to District personnel on request.

7.Actual emissions from this facility shall be less than the following:

- a. 42 tons per year of NO_x [Rule 1303(B)]
 - b. 46 tons per year of PM₁₀ [Rule 1303(B)]
 - c. 25 tons per year of VOC
 - d. 25 tons per year of SO_x
 - e. 100 tons per year of CO, calculated on a rolling twelve-month basis
 - f. 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs calculated on a rolling twelve-month basis.
- HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act). Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for CO and HAP via annual emission inventory reports for all criteria pollutants and HAP.

[District Rule 1303 - Offsets]

8.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]