



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

C011576

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 2027

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:

CAUSTIC SCRUBBER, DISSOLUTION PROCESS consisting of: HEE-Duall Model PT503-32S packed bed scrubber. Maximum exhaust flow rating 2000 CFM.

EQUIPMENT

Capacity	Equipment Description
0	Dissolution Scrubber
0	Dissolution Scrubber Stack

CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accordance 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 204]

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 1099

SCC: 39999989

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
Executive Director

2. This equipment shall be operated concurrently with the Dissolution Process under valid permit B011575.
[District Rules 204 and 1320]

3. Emissions from this scrubber shall not exceed:

- a. HCl 5 PPMV
- b. Cl₂ 5 PPMV

Emissions shall be verified by an initial source test to be conducted within 180 days of start up in accordance with the District Compliance Test Procedural Manual. No less than 30 days prior to the proposed test date a written protocol shall be submitted for review and approval. No less than 10 days prior to the proposed test date written notification of test date shall be submitted to the District. No later than 45 days after the test is performed, a written test report shall be submitted. All documents pertaining to the referenced source test shall be submitted to reporting@mdaqmd.ca.gov.
[District Rule 1520]

4. Upon completion of the construction of this scrubber, the SXH/I Tank Farm Scrubber (C011634), and all required piping, this scrubber shall vent the SXH/I Tank Farm Scrubber (C011634) unless required repairs or maintenance are being performed on C011576.
[District Rules 204 and 1320]

5. This scrubber will use caustic as needed to achieve compliance with the limit in Condition #3.
[District Rules 204 and 1320]

6. A pH meter shall be installed to indicate the pH of the scrubbant. Furthermore, the pH shall be maintained between 9 and 12 and the meter shall be calibrated at least quarterly in accordance with the manufacturer's procedures.
[District Rules 204 and 1303]

7. A flow meter, of appropriate range, shall be installed and maintained (including calibration) in accordance with manufacturers specification. The flow meter shall be installed such that measurements reflect the scrubbant recirculation flow.
[District Rules 204 and 1320]

8. When in operation, the minimum scrubbant recirculation flow rate shall be maintained between 35 and 55 GPM and the scrubber pressure drop shall be maintained between -4 to 1 inches water column. Scrubbant recirculation flow rate and pressure drop shall be recorded daily.
[District Rule 204 and 1320]

9. This equipment does not require regular emissions testing however testing may be required at District discretion.
[District Rule 1320]

10. In the event of a malfunction of any emissions related part of this scrubber, the Dissolution Process under District permit B011575 must be shut down as soon as safely possible and shall not be restarted until all malfunctions have been corrected. Equipment breakdowns shall be reported to the District in accordance with District Rule 430.
[District Rules 430 and 204]

11. The owner/operator must maintain an operations log for this equipment. This log shall be maintained current, kept for a total of five (5) years and be provided to authorized personnel upon request. The log shall contain the following at a minimum:

- a. Daily scrubbant pH readings demonstrating compliance with Condition #6;
 - b. Dates and results of all quarterly pH meter calibrations as required by Condition #6;
 - c. Daily pressure differential recording demonstrating compliance with Condition #8;
 - d. Daily scrubbant recirculation flow meter recording as required by Condition #8;
 - e. Annual inspection of spray nozzle(s) and spray nozzle system;
 - f. Dates and description of maintenance, repairs/replacements performed; and,
 - g. Times and durations of malfunctions, a description of each malfunction, and the corrective action taken for each malfunction.
- [District Rules 401 and 204]

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

- a. 42 tons per year of NO_x [District Rule 1303(B)]
 - b. 46 tons per year of PM₁₀ [District 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]

13. 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), Health & Safety Code 39607 & 44341-44342, 17 CCR 93400 et seq., and 40 CFR 51, Subpart A]