



DEC 02 2013

NRG Reliability Solutions
17685 Juniper Path; Suite 301
Lakeville, MN 55044
612-564-1973

November 25, 2013

Mr. George Czerniak, Director
Air and Radiation Division
Air Permits Section
Air Programs Branch (AR-18J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: Request for Administrative Amendment
Treasure Island Resort & Casino
Permit No. V-PI-2704900084-2012-11**

Dear Mr. Czerniak:

NRG Reliability Solutions (NRG) recently conducted an internal review of the generating facility located at Treasure Island Resort & Casino (Treasure Island) and would like to request an administrative amendment to its air permit for the items described below.

The generator facility at Treasure Island is unmanned. The generators are operated remotely, but during operation are continuously monitored. NRG personnel conduct inspections at a minimum on a monthly basis, but otherwise the generator building is unattended. The permit conditions listed above specifically require NRG to keep records "at the facility". NRG would prefer to keep all of the records required for the facility at its office in Lakeville. The records are readily available for review at the Lakeville office location.

We would like to request the following changes to these permit conditions:

Permit conditions 2.0(A)(9)(i)&(iii)

- (i) The Permittee shall develop and provide to each facility operator training to orient staff as to the applicable terms and conditions of this permit. The Permittee shall maintain on-site a log of the time, date, and place, and a list of attendees for, each training session. The Permittee shall maintain at the facility or at the main office and make available to an authorized EPA representative, upon request, a copy of the training materials presented in the training sessions.
- (ii) The Permittee shall keep a copy of this permit on file at the facility or at the main office at all times.

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Permit condition 2.0(C)(4)

In accordance with the recordkeeping requirements listed in Section 7 of PSD-PIR50003-00-01, the Permittee shall maintain a file of the records that are required to be retained by this permit at the facility or at the main office.

Also, under permit condition 4.0(F)(2), NRG is providing information that was inadvertently omitted from its past permit applications. Two 75-gallon day tanks are located inside the generator building. The day tanks are intermediate tanks filled from the 10,000 gallon underground diesel fuel storage tank when the generators are in operation. The two day tanks were omitted from the permit application list of insignificant activities. There are no additional air quality requirements for these tanks.

Thank you for your attention to this request. If you have any questions, please contact Gina Larson at (612) 564-1966 (gina.larson@nrgenergy.com) or Julie Miller of Barr Engineering Company at (952) 832-2906 (jmiller2@barr.com).

Sincerely,



Phil Kairis
Vice President

C: Gina Larson
Julie Miller