

Technical Support Document
Modification of
Air Quality Construction Permit
Permit No.: PSD-PI-2704900084-2012-02

This document serves as the statement of basis as required by 40 C.F.R. § 124.7. This document sets forth the legal and factual basis for the modifications to the existing permit conditions, and references to applicable statutory or regulatory provisions, including provisions under 40 C.F.R. § 52.21. The legal and factual basis for the unmodified terms are available in the Technical Support Document for the original Air Quality Construction Permit (Permit no. PSD-PI-R50003-00-01, issued on December 20, 2000), which is available at <http://www.epa.gov/reg5oair/permits/index.html>.

1.0 GENERAL INFORMATION

(A.) Applicant and Stationary Source Information

Owner	Facility (SIC Codes: 7011, 4911)
Energy Alternatives, Inc. 17685 Juniper Path, Suite 301 Lakeville, Minnesota 55044	Treasure Island Resort & Casino 5734 Sturgeon Lake Road Red Wing, Minnesota 55066 Prairie Island Indian Community

(B.) Contact Information

Responsible Official: Dale Gundberg, President
Energy Alternatives, Inc.
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Permit Contact: Phil Kairis, Vice President
Energy Alternatives, Inc.
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(C.) Project Description

Energy Alternatives, Inc. owns and operates four internal combustion engines for Treasure Island Resort and Casino in Red Wing, Minnesota. The engines are located on land that is held in trust

for the Prairie Island Indian Community. The facility housing the engines is located near Highways 61 and 316, between the cities of Hastings and Red Wing, in Goodhue County, Minnesota. The engines are used for peak load management and backup power for Treasure Island Resort and Casino.

The current action is a modification of PSD permit PSD-PI-R50003-00-01 that EPA issued on December 20, 2000. Modifications include administrative changes, such as a correction of mailing addresses and minor format changes, and a significant change to the required frequency of the periodic performance tests in Section 5 of the permit from three years to five years. The applicant requested the significant change in a letter dated August 16, 2007.

The source's testing reports show that the source has operated the four engines significantly less than the permitted 550 hours per year and has not exceeded the NO_x emission limits since startup. The source's operational and emissions history indicates a low likelihood that the source will exceed its NO_x emission limits. EPA, therefore, does not believe that there is a significant environmental risk in reducing the testing frequency from every three years to every five years. EPA finds that this altered term will provide sufficiently reliable and timely information for determining compliance, as required by section 504(b) of the Clean Air Act. If the performance tests demonstrate violations of the NO_x emission limits, EPA will reopen the permit to increase testing frequency to address the violation.