

# **Grand Casino Hinckley**

## **Part 71 Operating Permit Application**

Submitted by: Mille Lacs Band Corporate Commission  
dba/Grand Casino Hinckley

December 2005

Prepared by:  
**JEM Environmental, LLC**  
[jemenvironmental@mchsi.com](mailto:jemenvironmental@mchsi.com)

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

APPLICATION FORM CTAC - CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS BY RESPONSIBLE OFFICIAL

**INSTRUCTIONS:** One copy of this form must be completed, signed, and sent with each submission of documents (i.e., application forms, including any updates to applications), and for every document required by a part 71 permit (e.g., annual compliance certification, 6-month monitoring reports, progress reports, and notices required by the terms of a part 71 permit).

Responsible Official. Identify the responsible official and provide contact information.

Name: (Last) Lincoln (First) Jim (Middle) \_\_\_\_\_

Title VP of Facilities, Grand Casino Hinckley

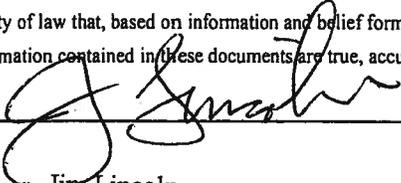
Street or Post Office Box 777 Lady Luck Drive

City Hinckley State MN ZIP 55037

Telephone (320) 384 - 4907 Ext. \_\_\_\_\_ Facsimile (320) 384 - 4857

Certification of Truth, Accuracy and Completeness. The Responsible Official must sign this statement.

I certify under penalty of law that, based on information and belief formed after reasonable \*inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed)  \_\_\_\_\_

Name (printed or typed) Jim Lincoln Date: 11.30.15

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71  
APPLICATION FORM GIS - GENERAL INFORMATION AND SUMMARY

Instructions: Complete this form once for the part 71 source (facility).

**A. Mailing Address and Contact Information**

Facility name Grand Casino Hinckley

Mailing address: Street or P.O. Box 777 Lady Luck Drive

City Hinckley

State MN

ZIP 55037 - \_\_\_\_\_

Contact person: Jim Lincoln

Title Facilities Vice President

Telephone ( 320 ) 384 - 4907

Ext. \_\_\_\_\_

Facsimile ( 320 ) 384 - 4857

**B. Facility Location**

Temporary source?  Yes  No Plant site location 777 Lady Luck Drive

City Hinckley

State MN

County Pine

EPA Region 5

Is the facility located within:

Indian lands?  YES  NO

OCS waters?  YES  NO

Nonattainment area?  YES  NO

If yes, for what air pollutants? \_\_\_\_\_

Within 50 miles of affected State?  YES  NO

If yes, What State(s)? WI

**C. Owner**

Name Mille Lacs Band Corporate Commission dba/Grand Street/ P.O. Box 777 Lady Luck Drive  
Casino Hinckley

City Hinckley

State MN

ZIP 55037 - \_\_\_\_\_

Telephone ( 320 ) 523 - 8882

Ext. \_\_\_\_\_

**D. Operator**

Name Same as owner

Street/ P.O. Box \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

ZIP \_\_\_\_\_ - \_\_\_\_\_

Telephone ( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_

Ext. \_\_\_\_\_





**J. Facility Emissions Summary**

Instructions: Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx 492.0 tons/yr      VOC 15.0 tons/yr      SO2 12.0 tons/yr  
 PM-10 9.3 tons/yr      CO 39.8 tons/yr      Lead 0 tons/yr  
 Total HAP 0.4 tons/yr

Which single HAP emitted in the greatest amount? Benzene PTE? 0.2 tons/yr

Total emissions of regulated pollutants (for fee calculation) from section F, line 5 of form FEE? 15 tons/yr

**K. Existing Federally Enforceable Permits:**

Permit number(s) PSD-MO-R50005-03-01 Permit type PSD Construction Permitting authority EPA Region 5  
 Permit number(s) \_\_\_\_\_ Permit type \_\_\_\_\_ Permitting authority \_\_\_\_\_

**L. Emission Unit(s) Covered by General Permits**

Emission unit(s) subject to general permit \_\_\_\_\_  
 Check one:      \_\_\_ Application made      \_\_\_ Coverage granted  
 General permit identifier \_\_\_\_\_ Expiration Date \_\_\_/\_\_\_/\_\_\_

**M. Cross-referenced Information**

Does this application cross-reference information? X YES    \_\_\_ NO    **PSD Construction Permit Application**

**Attachment to Form GIS**

**G. Source-Wide PTE Restrictions and Generic Applicable Requirements**

**Permit Number: PSD-ML-R50005-03-01**

**Section 3. General Permit Conditions**

**Construction without a Permit.** Any owner or operator who constructs or operates a source or modification not in accordance with the terms of any approval to construct, or any owner or operator of a source or modification subject to 40 CFR 52.21 who commences construction without applying for and receiving approval hereunder, shall be subject to appropriate enforcement action.

**Construction Approval.** Approval for construction or installation shall not relieve any owner or operator of the responsibility to comply fully with applicable provisions of any other requirements under Mille Lacs Band of Ojibwe law or Federal law.

**Compliance with Permit Requirements.** The owner or operator must comply with each permit term and condition. Failure to comply with the terms and conditions of this permit or any other applicable provisions under the Clean Air Act or 40 CFR 52.21 constitutes noncompliance and a violation of 40 CFR 52.21 and the Clean Air Act, except those requirements specifically designated as not federally-enforceable, and is grounds for:

1. An enforcement action under section 113 of the Clean Air Act,
2. Permit termination, revocation and reissuance, or modification in accordance with 40 CFR 52.21, or
3. Denial of a Federal operating permit application under 40 CFR Part 71.

**Good Air Pollution Control Practice.** At all times, including start-up, shut-down, and malfunction, the owner or operator shall, to the extent practicable maintain and operate all sources in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance practices are being used is based on information available to the EPA, which may include, but is not limited to, monitoring results, review or operating and maintenance procedures, and inspections of the facility. In addition, the owner or operator shall comply with the following limitations.

1. Develop and provide training to orient each facility plant operator with the applicable terms and conditions of this permit. Maintain a log of the time, date, place, and list of attendees for each training session, and a copy of the materials present in the training sessions. Report to the EPA, if requested. The records of the training shall be maintained at the facility and available for inspection by authorized representatives of EPA.
2. Develop and implement standard operation and maintenance procedures for each emission unit listed in this permit. Keep a copy of the procedures available at a location within the facility that is readily accessible to operators of the sources and to authorized representatives of the EPA.
3. Keep a copy of this permit on file at the facility.

## **Attachment to Form GIS**

### **G. Source-Wide PTE Restrictions and Generic Applicable Requirements**

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**Enforcement.** It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.

**Credible Evidence.** For purposes of establishing whether or not the owner or operator of the facility has violated or is in violation of any standard in this permit, nothing in this permit precludes the use by the source, the EPA or the public, or any credible evidence to determine whether the facility would have been in compliance with applicable requirements if the appropriate performance test or procedures had been performed.

**Severability.** The terms and conditions in this permit are distinct and severable. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of this permit. If any terms or condition in this permit is held invalid, such invalidity shall not affect other provisions or the application of such terms or conditions.

**Permit rescission.** This permit shall remain in effect, unless and until it expires under 40 CFR 52.21(r) or is rescinded. The owner or operator may request that the EPA rescind this permit or a particular portion of this permit. The EPA shall grant an application for rescission if the application shows that 40 CFR 52.21 would not apply to the source or modification. If the EPA rescinds the permit, or any portion of the permit, the public shall be given adequate notice of the rescission. Publication of an announcement or rescissions shall be given in a newspaper of general circulation in the affected region within 60 days of the rescissions.

**Revocation, Suspension, or Modification of the Permit.** This permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the owner or operator for modification, revocation and re-issuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit term or condition.

**Property Rights.** This permit does not convey any property rights of any sort, nor any exclusive privilege.

**Entry and Inspection Procedures.** The owner or operator shall allow an officer or employee of the EPA or an inspector authorized by the EPA, upon presentation or credentials to:

1. Enter upon the premises where a source subject to this permit is located or where records required by the permit are kept;
2. Have access to and copy records required by the permit;
3. Inspect any facilities, equipment, practices, or operations regulated by or referenced in this permit; and
4. Sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

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**G. Source-Wide PTE Restrictions and Generic Applicable Requirements**

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**Circumvention.** The owner or operator shall not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a Federal air pollution control requirement in this permit.

**Major Source Requirement.** The owner or operator shall obtain permits or permit revisions before constructing a new source or modifying an existing source. The owner or operator shall not construct, operate, or modify a source in a manner that would result in a violation of applicable emission standards or interfere with the attainment or maintenance of the ambient air quality standards or maximum allowable ambient concentrations. The owner or operator shall keep a record of all activities undertaken to construct and modify a source and any permits or approvals obtained to perform such activities. Upon request of the EPA, the owner or operator shall submit copies of such records.

**Continuous Monitoring Systems.** The owner or operator shall install, calibrate, operate and maintain air contaminant emissions and process monitoring equipment on the emissions units as required by the permit described herein and in documents provided by the owner or operator. The owner or operator shall submit monitoring equipment siting, operating, maintenance plans, and procedures for approval by the EPA.

**Section 7. Record Keeping, Notification, and Reporting Requirements**

**Notification Requirement.** The owner or operator shall operate and modify the facility only in accordance with the conditions and requirements of this permit. The owner or operator shall notify the EPA prior to:

- a. Installing an emission unit or source at the Facility that is not listed in Section 8 of the PSD permit;
- b. Making a change to a source listed in Section 8 that would cause it to deviate from the description of it provided in Section 8; or
- c. Making a change to the emission characteristics of a source, including waste heat recovery, in a manner that would increase the ambient impact beyond that which the EPA used when issuing this permit.

**Notification of Modification.** The owner or operator shall furnish EPA written notification of any physical or operational change to EU 001, 002, and 003 or to the existing facility which may increase the emission rate of any air pollutant in major or significant amounts as defined under 40 CFR 52.21, or which would be subject to any applicable emissions standard and standard of performance under 40 CFR parts 60, 61, or 63. This notice shall be postmarked 90 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The EPA may request additional relevant information subsequent to this notice.

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**G. Source-Wide PTE Restrictions and Generic Applicable Requirements**

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**Excess Emissions Report.** The owner or operator shall report all emissions or operations that exceed or deviate from the requirements of this permit.

The owner or operator shall submit an excess emissions report to the EPA semiannually, except when more frequent reporting is specifically required or the EPA determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30<sup>th</sup> day following the end of each six-month period. The excess emissions report form shall contain the information and be in the format shown in Attachment 1 unless otherwise specified by the EPA. When no excess emissions have occurred such information shall be state in t the report.

**Excess Emissions.** The owner or operator shall report all emissions or operations that exceed or deviate from the requirements of this permit and that present a potential threat to human health or safety as soon as possible, but no later than 48 hours, after discovery.

**Information Requests.** The owner or operator shall furnish to the EPA any information the Agency requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit, or to determine compliance with the permit. Upon request, the owner or operator shall furnish to the Agency copies of records required to be kept by this permit.

**Availability of Information.** The availability to the public of information provided to, or otherwise obtained by, the EPA shall be governed by 40 CFR 2. Any records, reports, or information obtained shall be available to the public, except that upon a showing satisfactory to the EPA by any person that records, reports, or information, or particular part thereof (other than emission data), to which the EPA has access if made public, would divulge methods or processes entitled to protection as trade secrets of such person, the EPA shall consider such records, report, or information or particular portion thereof confidential in accordance with the purposes of section 1905 of title 18 of the United States Code, except that such record, report, or information may be disclosed to other officers, employees, or authorized representatives of the United States concerned with carrying out the Clean Air Act or when relevant in any proceeding under the Clean Air Act.

**Submittals.** Unless otherwise directed by the EPA or this permit, the owner or operator shall submit a copy of all test plans, reports, certifications, notifications, and other information pertaining to compliance with this permit to:

Mr. George Czerniak  
Air Enforcement and Compliance  
Assurance Branch (AE-17J)  
Air and Radiation Division  
EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

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**G. Source-Wide PTE Restrictions and Generic Applicable Requirements**

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The owner or operator shall submit copies of permit applications, permit amendments, and other applicable permit information, which includes but not limited to installation of control equipment, replacement of an emissions unit, and changes that contravene permit terms, to:

Mr. Robert Miller, Chief  
Permits and Grants Section MI/MN/WI (AR-18J)  
Air and Radiation Division  
EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**Operation of Emissions Units.** In any shutdown or breakdown of EU 001, 002, or 003 or deviation from any permit terms, the owner or operator shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The EPA may require feasible and practical modifications in the operation to reduce emissions of air pollutants.

**Compliance.** Nothing in this permit allows the operation of an emission facility, emission unit, or stationary source which may endanger human health or the environment; or allows the owner or operator of an emission facility to violate an applicable requirement or compliance document.

**Section 8. Certification**

The following terms and conditions apply under the authority of the Clean Air Act and 40 CFR 52.21.

**Certification Requirement.** The owner or operator shall certify all reports, compliance certifications, or other documents submitted to the EPA under this permit. All reports must be certified upon submittal, as follows:

**Annual Compliance Certification.** The owner or operator shall submit a compliance certification to the EPA to certify compliance or noncompliance with the terms and conditions in this permit. The compliance certification shall be submitted to the EPA Regional office to the Air Enforcements and Compliance Assurance Branch address listed above. The owner or operator shall submit the compliance certification by January 30<sup>th</sup> of each year for the previous calendar year.

**Responsible Official.** All reports, compliance certifications, or other documents submitted to the EPA under this permit shall include the following statement:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that

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**G. Source-Wide PTE Restrictions and Generic Applicable Requirements**

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qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine, imprisonment, or both, for knowing violations. See, e.g., 18 U.S.C. 1001.”

The certification must be signed by a corporate officer or other responsible management official.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**APPLICATION FORM EUD-1 - EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES**

INSTRUCTIONS: Complete this form for each significant emissions unit best described as a fuel combusting unit.

**A. General Information**

Emissions unit ID 001 Description Generator Set  
SIC Code (4-digit) 4911 SCC Code 20100102

**B. Emissions Unit Description**

Primary use Peak load management and backup power Temporary source  Yes  No

Manufacturer Caterpillar Model No. 3516B

Serial Number OFDN00430 Installation date 12 / 04 / 2004

Boiler Type:

Industrial boiler  Process burner  Electric utility boiler  
 Other (describe) \_\_\_\_\_

Boiler horsepower rating \_\_\_\_\_ Boiler steam flow (lb/hr) \_\_\_\_\_

Type of Fuel-Burning Equipment (coal burning only):

Hand fired  Spreader stoker  Underfeed stoker  Overfeed stoker  
 Traveling grate  Shaking grate  Pulverized, wet bed  Pulverized, dry bed

Actual (average) Heat Input \_\_\_\_\_ MM BTU/hr Maximum design heat input \_\_\_\_\_ MM BTU/hr

**C. Fuel Data**

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Instructions: Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (per cf, gal., or lb.)
Diesel Fuel	0.05%		138,690 Btu/gal

**D. Fuel Usage Rates**

Instructions: For each fuel described above, enter actual and maximum fuel usage rates on a worst-case hourly and annual basis. Indicate the dimension for the fuel usage rate (e.g., gallons, cords, cubic feet).

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Diesel	33,071 gallons	130.2 gallons	1,140,552 gallons

**E. Associated Air Pollution Control Equipment**

Emissions unit ID \_\_\_\_\_ Device type \_\_\_\_\_

Air pollutant(s) Controlled \_\_\_\_\_ Manufacturer \_\_\_\_\_

Model No. \_\_\_\_\_ Serial No. \_\_\_\_\_

Installation date \_\_\_\_/\_\_\_\_/\_\_\_\_ Control efficiency (%) \_\_\_\_\_

Efficiency estimation method \_\_\_\_\_

**F. Ambient Impact Assessment**

Instructions: This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit.

Stack height (ft) 26 Inside stack diameter (ft) 1.33

Stack temp(°F) 899 Design stack flow rate (ACFM) 15676

Actual stack flow rate (ACFM) 15676 Velocity (ft/sec) 187

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**APPLICATION FORM EUD-1 - EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES**

**INSTRUCTIONS:** Complete this form for each significant emissions unit best described as a fuel combusting unit.

**A. General Information**

Emissions unit ID 002 Description Generator Set  
SIC Code (4-digit) 4911 SCC Code 20100102

**B. Emissions Unit Description**

Primary use Peak load management and backup power Temporary source  Yes  No

Manufacturer Caterpillar Model No. 3516B

Serial Number OFDN00427 Installation date 12 / 04 / 2004

Boiler Type:

Industrial boiler  Process burner  Electric utility boiler

Other (describe) \_\_\_\_\_

Boiler horsepower rating \_\_\_\_\_ Boiler steam flow (lb/hr) \_\_\_\_\_

Type of Fuel-Burning Equipment (coal burning only):

Hand fired  Spreader stoker  Underfeed stoker  Overfeed stoker

Traveling grate  Shaking grate  Pulverized, wet bed  Pulverized, dry bed

Actual (average) Heat Input \_\_\_\_\_ MM BTU/hr Maximum design heat input \_\_\_\_\_ MM BTU/hr

**C. Fuel Data**

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Instructions: Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (per cf, gal., or lb.)
Diesel Fuel	0.05%		138,690 Btu/gal

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Instructions: For each fuel described above, enter actual and maximum fuel usage rates on a worst-case hourly and annual basis. Indicate the dimension for the fuel usage rate (e.g., gallons, cords, cubic feet).

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		Hourly	Annual
Diesel	33,071 gallons	130.2 gallons	1,140,552 gallons

**E. Associated Air Pollution Control Equipment**

Emissions unit ID \_\_\_\_\_ Device type \_\_\_\_\_

Air pollutant(s) Controlled \_\_\_\_\_ Manufacturer \_\_\_\_\_

Model No. \_\_\_\_\_ Serial No. \_\_\_\_\_

Installation date \_\_\_\_/\_\_\_\_/\_\_\_\_ Control efficiency (%) \_\_\_\_\_

Efficiency estimation method \_\_\_\_\_

**F. Ambient Impact Assessment**

Instructions: This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit.

Stack height (ft) 26 Inside stack diameter (ft) 1.33

Stack temp(°F) 899 Design stack flow rate (ACFM) 15676

Actual stack flow rate (ACFM) 15676 Velocity (ft/sec) 187

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**APPLICATION FORM EUD-1 - EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES**

INSTRUCTIONS: Complete this form for each significant emissions unit best described as a fuel combusting unit.

**A. General Information**

Emissions unit ID 003 Description Generator Set  
SIC Code (4-digit) 4911 SCC Code 20100102

**B. Emissions Unit Description**

Primary use Peak load management and backup power Temporary source  Yes  No

Manufacturer Caterpillar Model No. 3516B

Serial Number OFDN00431 Installation date 12 / 04 / 2004

Boiler Type:

Industrial boiler  Process burner  Electric utility boiler

Other (describe) \_\_\_\_\_

Boiler horsepower rating \_\_\_\_\_ Boiler steam flow (lb/hr) \_\_\_\_\_

Type of Fuel-Burning Equipment (coal burning only):

Hand fired  Spreader stoker  Underfeed stoker  Overfeed stoker

Traveling grate  Shaking grate  Pulverized, wet bed  Pulverized, dry bed

Actual (average) Heat Input \_\_\_\_\_ MM BTU/hr Maximum design heat input \_\_\_\_\_ MM BTU/hr

**C. Fuel Data**

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Instructions: Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (per cf, gal., or lb.)
Diesel Fuel	0.05%		138,690 Btu/gal

**D. Fuel Usage Rates**

Instructions: For each fuel described above, enter actual and maximum fuel usage rates on a worst-case hourly and annual basis. Indicate the dimension for the fuel usage rate (e.g., gallons, cords, cubic feet).

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Diesel	33,071 gallons	130.2 gallons	1,140,552 gallons

**E. Associated Air Pollution Control Equipment**

Emissions unit ID \_\_\_\_\_ Device type \_\_\_\_\_

Air pollutant(s) Controlled \_\_\_\_\_ Manufacturer \_\_\_\_\_

Model No. \_\_\_\_\_ Serial No. \_\_\_\_\_

Installation date \_\_\_\_/\_\_\_\_/\_\_\_\_ Control efficiency (%) \_\_\_\_\_

Efficiency estimation method \_\_\_\_\_

**F. Ambient Impact Assessment**

Instructions: This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit.

Stack height (ft) 26 Inside stack diameter (ft) 1.33

Stack temp(°F) 899 Design stack flow rate (ACFM) 15676

Actual stack flow rate (ACFM) 15676 Velocity (ft/sec) 187



Final Product Specifications at Destination

### Performance Gold Diesel <sup>®</sup>

Revised: 8/15/05

Effective summer 2005, for MN destinations this product will be reek blended with  $\geq$  2% Biodiesel complying with ASTM D6751.

**Distillation**

90% Recovered, °F	ASTM D86	Report		
95% Recovered, °F	ASTM D86	840	840	

**Combustion Properties**

Flash P.M., °F	ASTM D86	128 (MN) 100 (WV)		
Cetane Number	ASTM D613	42-48 typical		
Cetane Index by ASTM D678	ASTM D678	40 (or $\geq$ 36% Aromatics)		

**Fluidity**

Viscosity, cSt @104 °F (40°C)	ASTM D445	1.9	4.1	
Pour Point, °F	ASTM D97 or D2296		-18 (Nov-Mar), 10 (Apr-Oct)	
CFPP, °F	ASTM D6371		-15 typical (Nov-Mar)	
Lubricity, %	ASTM D6076	4800 typical		

**Gravity & Mixing**

Gravity Average, °API	ASTM D1298 or D4052	Report		
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**Composition**

Sulfur, Total, wt% (D 2822 primary method)	ASTM D2823 or D4294		0.05	
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**Corrosion and Stability**

Corrosion, Copper 3 hours @ 122°F	ASTM D130		3	
Filter Pad Rating (thermal oxidative stability)	ASTM D488	90 typical		
Accelerated Stability, mg/L	ASTM D6274		18	
Detergency, I-10 Injector	CRC Rating		10	
Deposits Test	% Flow Loss		8	

**Color and Contaminants**

Color (ASTM)	ASTM D 1500		2.5	
Free Water Visual Inspection (Haze)	ASTM D4178		2	
Ramabottom Carbon Residue on 10% Distillation Residue, %mass	ASTM D624		0.25	
Water & Sediment, % vol	ASTM D2708		0.05	
Ash, % mass	ASTM D482		0.01	

**Additives**

Red Dye			See note	A
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**Notes**

A Product shall not be dyed at the tank. If product is not taxed for on road use, it must contain red dye to be injected at the rack. If so, the

Post-It <sup>®</sup> Fax Note	7871	Date	11/11/05
To	GINA	From	BAGB
Co./Dept.	ENERGY ALT.	Co.	YOCUM OIL
Phone #		Phone #	709-6915
Fax #	651-460-6717	Fax #	

## Heat Content of Fuels

- ◆ Heating Oil has 138,690 BTUs per gallon
- ◆ Natural Gas has 1,030 BTUs per cubic foot, 135 cubic feet = heat content of 1 gallon of oil
- ◆ Kerosene has 131,890 BTUs per gallon, 1.05 gallons = heat content of 1 gallon of oil
- ◆ Propane has 91,500 BTUs per gallon, 1.52 gallons = heat of 1 gallon of oil
- ◆ Electricity has 3,413 BTUs per kilowatt hour 40.6 kwh = heat content of 1 gallon of oil.
- ◆ One cord of wood equals 95 gallons of oil
- ◆ Anthracite Coal has 12,000 BTUs per pound 12 pounds = heat content of 1 gallon of oil

U.S. ENVIRONMENTAL PROTECTION AGENCY  
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**APPLICATION FORM IE - INSIGNIFICANT EMISSIONS**

**INSTRUCTIONS:** List each source eligible for insignificant treatment under § 71.5(c)(1)(ii). In the "number" column, indicate the number of units qualifying under each description. Each description must be specific enough to describe the source of emissions. List emission units separately if they have dissimilar descriptions, including dissimilar capacities or sizes and other factors. Please check the appropriate column to indicate whether the source meets the emissions criteria under § 71.5(c)(1)(ii)(A) and (B) for regulated air pollutants except hazardous air pollutant (RAP, except HAP), and for HAP, respectively.

Number	Description of Activities or Emission Units	RAP, except HAP	HAP
2	Building Heating Units, natural gas fired, rated heat input 4.5 MMBtu/hr each	X	X
1	Building Heating Unit, natural gas fired, rated heat input 2.1 MMBtu/hr	X	X
2	Building Heating Units, natural gas fired, rated heat input 2.5 MMBtu/hr each	X	X
2	Building Heating Units, natural gas fired, rated heat input 0.4 MMBtu/hr each	X	X
5	Building Heating Units, natural gas fired, rated heat input 0.245 MMBtu/hr each	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.1 MMBtu/hr	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.205 MMBtu/hr	X	X
5	Building Heating Units, natural gas fired, rated heat input 0.7 MMBtu/hr each	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.455 MMBtu/hr	X	X
2	Building Heating Units, natural gas fired, rated heat input 0.125 MMBtu/hr each	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.27 MMBtu/hr	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.999 MMBtu/hr	X	X
1	Building Heating Unit, natural gas fired, rated heat input 1.1 MMBtu/hr	X	X
1	Building Heating Unit, natural gas fired, rated heat input 2.03 MMBtu/hr	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.425 MMBtu/hr	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.375 MMBtu/hr	X	X
1	Building Heating Unit, natural gas fired, rated heat input 0.07 MMBtu/hr	X	X

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**APPLICATION FORM IE - INSIGNIFICANT EMISSIONS**

**INSTRUCTIONS:** List each source eligible for insignificant treatment under § 71.5(c)(1 1)(ii). In the "number" column, indicate the number of units qualifying under each description. Each description must be specific enough to describe the source of emissions. List emission units separately if they have dissimilar descriptions, including dissimilar capacities or sizes and other factors. Please check the appropriate column to indicate whether the source meets the emissions criteria under § 71.5(c)(1 1)(ii)(A) and (B) for regulated air pollutants except hazardous air pollutant (RAP, except HAP), and for HAP, respectively.

Number	Description of Activities or Emission Units	RAP, except HAP	HAP
41	Building Heating Units, natural gas fired, rated heat input 0.085 MMBtu/hr each	X	X
2	Water Heating Units, natural gas fired, rated heat input 1.625 MMBtu/hr each	X	X
5	Water Heating Units, natural gas fired, rated heat input 0.264 MMBtu/hr each	X	X
1	Water Heating Unit, natural gas fired, rated heat input 0.4 MMBtu/hr	X	X
5	Water Heating Units, natural gas fired, rated heat input 0.3 MMBtu/hr each	X	X
1	Water Heating Unit, natural gas fired, rated heat input 0.399 MMBtu/hr	X	X
1	Water Heating Unit, natural gas fired, rated heat input 0.775 MMBtu/hr	X	X
1	Water Heating Unit, natural gas fired, rated heat input 0.35 MMBtu/hr	X	X
3	Water Heating Units, natural gas fired, rated heat input 0.199 MMBtu/hr each	X	X
4	Water Heating Units, natural gas fired, rated heat input 0.36 MMBtu/hr each	X	X
3	Water Heating Units, natural gas fired, rated heat input 0.165 MMBtu/hr each	X	X
1	Water Heating Unit, natural gas fired, rated heat input 0.305 MMBtu/hr	X	X
1	Water Heating Unit, natural gas fired, rated heat input 0.075 MMBtu/hr	X	X
1	Emergency Generator, 960 hp, used for life safety purposes only, run 1 hr/month for maintenance/testing, actual emissions are less than one ton per year for RAP.		X
1	Emergency Generator, 535 hp, used for life safety purposes only, run 1 hr/month for maintenance/testing, actual emissions are less than one ton per year for RAP.		X

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**FORM EMISS - EMISSIONS CALCULATIONS**

**INSTRUCTIONS:** Use this form to calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form GIS. If form FEE does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 001

**B. Identification and Quantification of Emissions**

**Instructions:** First, list each air pollutant that is either regulated at the unit or present in major amounts. Second, list any other regulated pollutant (for fee calculation) emitted at the unit that have not already been listed. Each HAP added to the list in this step may be simply listed as "HAP". Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each listed air pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives, including those that do not count towards applicability, when calculating actual emissions. At a minimum, round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values. Attach examples of calculations that illustrate the methodology used.

Air Pollutants (including regulated air pollutants and pollutants for which the source is major)	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.2	1.1	5.0	
NOx	5.0	37.4	164.0	
CO	0.5	3.0	13.3	
PM	0.1	0.9	3.8	
PM10	0.1	0.7	3.1	
SO2	0.1	0.9	4.0	
HAP1 – Benzene	0.0	0.0	0.2	71432
HAP2 – Toluene	0.0	0.0	0.1	108883
HAP3 – Xylenes	0.0	0.0	0.0	1330207
HAP4 – Formaldehyde	0.0	0.0	0.0	50000
HAP4 – Acetaldehyde	0.0	0.0	0.0	75070



U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**FORM EMISS - EMISSIONS CALCULATIONS**

**INSTRUCTIONS:** Use this form to calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form GIS. If form FEE does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 002

**B. Identification and Quantification of Emissions**

**Instructions:** First, list each air pollutant that is either regulated at the unit or present in major amounts. Second, list any other regulated pollutant (for fee calculation) emitted at the unit that have not already been listed. Each HAP added to the list in this step may be simply listed as "HAP". Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each listed air pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives, including those that do not count towards applicability, when calculating actual emissions. At a minimum, round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values. Attach examples of calculations that illustrate the methodology used.

Air Pollutants (including regulated air pollutants and pollutants for which the source is major)	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.2	1.1	5.0	
NOx	5.0	37.4	164.0	
CO	0.5	3.0	13.3	
PM	0.1	0.9	3.8	
PM10	0.1	0.7	3.1	
SO2	0.1	0.9	4.0	
HAP1 - Benzene	0.0	0.0	0.2	71432
HAP2 - Toluene	0.0	0.0	0.1	108883
HAP3 - Xylenes	0.0	0.0	0.0	1330207
HAP4 - Formaldehyde	0.0	0.0	0.0	50000
HAP4 - Acetaldehyde	0.0	0.0	0.0	75070



U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**FORM EMISS - EMISSIONS CALCULATIONS**

**INSTRUCTIONS:** Use this form to calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form GIS. If form FEE does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 003

**B. Identification and Quantification of Emissions**

**Instructions:** First, list each air pollutant that is either regulated at the unit or present in major amounts. Second, list any other regulated pollutant (for fee calculation) emitted at the unit that have not already been listed. Each HAP added to the list in this step may be simply listed as "HAP". Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each listed air pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives, including those that do not count towards applicability, when calculating actual emissions. At a minimum, round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values. Attach examples of calculations that illustrate the methodology used.

Air Pollutants (including regulated air pollutants and pollutants for which the source is major)	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.2	1.1	5.0	
NOx	5.0	37.4	164.0	
CO	0.5	3.0	13.3	
PM	0.1	0.9	3.8	
PM10	0.1	0.7	3.1	
SO2	0.1	0.9	4.0	
HAP1 - Benzene	0.0	0.0	0.2	71432
HAP2 - Toluene	0.0	0.0	0.1	108883
HAP3 - Xylenes	0.0	0.0	0.0	1330207
HAP4 - Formaldehyde	0.0	0.0	0.0	50000
HAP4 - Acetaldehyde	0.0	0.0	0.0	75070



**Grand Casino Hinckley  
Title V Permit Application**

Emissions Calculations  
3516B Caterpillar Engines

2593 bhp  
2000 kW  
130.2 gal/hr

Emission Rate	VOC	NOx	CO	PM	PM10	SO2	HAPs
Emission Factors Units:	0.20 (g/hp-hr)	6.55 (g/hp-hr)	0.53 (g/hp-hr)	0.15 (g/hp-hr)	0.12 (g/hp-hr)	0.91 (lb/hr)	0.03 (lb/hr)
Hourly Emissions Per Engine:	(lb/hr) 1.14	(lb/hr) 37.44	(lb/hr) 3.03	(lb/hr) 0.86	(lb/hr) 0.70	(lb/hr) 0.91	(lb/hr) 0.03
Total (3 Engines):	3.43	112.33	9.09	2.57	2.11	2.73	0.08
Potential to Emit Per Engine:	(tons/yr) 5.01	(tons/yr) 164.00	(tons/yr) 13.27	(tons/yr) 3.76	(tons/yr) 3.09	(tons/yr) 3.99	(tons/yr) 0.12
Total (3 Engines):	15.02	492.00	39.81	11.27	9.26	11.98	0.35
Limited Emissions Per Engine:	(tons/yr) 0.46	(tons/yr) 14.98	(tons/yr) 1.21	(tons/yr) 0.34	(tons/yr) 0.28	(tons/yr) 0.36	(tons/yr) 0.01
Total (3 Engines):	1.37	44.93	3.64	1.03	0.85	1.09	0.03
Actual Emissions Per Engine:	(tons/yr) 0.17	(tons/yr) 5.01	(tons/yr) 0.46	(tons/yr) 0.13	(tons/yr) 0.11	(tons/yr) 0.14	(tons/yr) 0.00
Total (3 Engines):	0.52	15.04	1.39	0.39	0.32	0.42	0.01

Emission factors for NOx, VOC, PM and CO were provided by Ziegler for a Caterpillar 3516B engine. VOC measured as hydrocarbons. Based on 100 percent load.

PM10 is calculated based on the fraction of PM10 in PM provided in AP-42, Table 3.4-2, multiplied by the emission factor for PM provided by the engine manufacturer.

$$0.12 \text{ g PM10/hp-hr} = 0.0573 \text{ lb PM10/MMBtu} / 0.0697 \text{ lb PM/MMBtu} * 0.15 \text{ g PM/hp-hr}$$

$$\text{SO2(lb/hr)} = 130.2 \text{ gal/hr} * 7 \text{ lb/gal fuel density} * 0.05 \text{ part S/100 part fuel} * \text{lbmol S/32 lb S} * 64 \text{ lb SO2/lbmol SO2}$$

Actual Emissions are based on estimated operating hours in 2005.

Engines 1-3 each operated 254 hours from January to October 2005.

254 hours/10 months \* 12 months = 305 hours per year estimated.

Actual NOx emissions are based on initial performance test results from July 12&13, 2005.

Engine 1, 32.0 lb/hr, Engine 2, 33.8 lb/hr and Engine 3, 32.8 lb/hr.

**Grand Casino Hinckley  
Title V Permit Application**

Emissions Calculations

2593 bhp  
2000 kW  
130.2 gal/hr

Per Engine:	Emission Factors (lb/MMBtu)	Estimated Actual Emissions (ton/yr)	Potential to Emit		Limited PTE (tons/yr)
			(lb/hr)	(tons/yr)	
HAPs					
Benzene	7.76E-04	0.0021	0.0140	0.0614	0.0056
Toluene	2.81E-04	0.0008	0.0051	0.0222	0.0020
Xylenes	1.93E-04	0.0005	0.0035	0.0153	0.0014
Formaldehyde	7.89E-05	0.0002	0.0014	0.0062	0.0006
Acetaldehyde	2.52E-05	0.0001	0.0005	0.0020	0.0002
Acrolein	7.88E-06	0.0000	0.0001	0.0006	0.0001
Naphthalene	1.30E-04	0.0004	0.0023	0.0103	0.0009
Total HAPs	1.49E-03	0.0041	0.0269	0.1180	0.0108

3 Engines Total:	Emission Factors (lb/MMBtu)	Estimated Actual Emissions (ton/yr)	Potential to Emit		Limited PTE (tons/yr)
			(lb/hr)	(tons/yr)	
HAPs					
Benzene	7.76E-04	0.0064	0.0420	0.1841	0.0168
Toluene	2.81E-04	0.0023	0.0152	0.0667	0.0061
Xylenes	1.93E-04	0.0016	0.0105	0.0458	0.0042
Formaldehyde	7.89E-05	0.0007	0.0043	0.0187	0.0017
Acetaldehyde	2.52E-05	0.0002	0.0014	0.0060	0.0005
Acrolein	7.88E-06	0.0001	0.0004	0.0019	0.0002
Naphthalene	1.30E-04	0.0011	0.0070	0.0308	0.0028
Total HAPs	1.49E-03	0.0123	0.0808	0.3540	0.0323

HAP emission factors are from AP-42, Table 3.4-3 and Table 3.4-4.

The heat capacity of fuel oil, 138,690 Btu/gal was provided by the fuel oil supplier.  
130 gal/hr \* 138,690 Btu/gal = 18.06 MMBtu/hr at peak engine capacity.

Actual Emissions are based on estimated operating hours in 2005.  
Engines 1-3 each operated 254 hours from January to October 2005.  
254 hours/10 months \* 12 months = 305 hours per year estimated.



U.S. ENVIRONMENTAL PROTECTION AGENCY  
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FORM FEE - FEE CALCULATION WORKSHEET

INSTRUCTIONS: Use this form to initially or thereafter on an annual basis report actual emissions and calculate fees, consistent with § 71.9.

A. General Information

Instructions: All sources must complete this section.

Type of fee calculation worksheet (Check one):

- Initial
- Annual

Deadline for submitting fee calculation worksheet 12 / 04 / 2005

For initial fee calculation worksheets, emissions are based on (Check one):

- Actual emissions for the preceding year
- Estimates of actual emissions for the preceding year
- Estimates of actual emissions for the current year

If you checked the last box, provide the date the facility commence operations 12 / 04 / 2004

B. Source Information

Instructions: Complete this section only if you are not applying for a permit at this time.

Source or facility name \_\_\_\_\_

Mailing address: Street or P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_ - \_\_\_\_\_

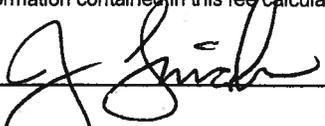
Contact person \_\_\_\_\_ Title \_\_\_\_\_

Telephone (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_ Ext. \_\_\_\_\_ Part 71 permit no. \_\_\_\_\_

C. Certification of Truth, Accuracy and Completeness

Instructions: This form must be signed by the responsible official.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this fee calculation worksheet (and attachments) are true, accurate and complete.

Name (signed) 

Name (typed) Jim Lincoln

Date: 11 / 30 / 05





**F. Fee Calculation Worksheet**

**Instructions:** This section of the form is used to calculate the total fee owed for initial application or annual fee payment purposes. Unless otherwise instructed to proceed to a different line, always proceed to the next line. If you do not need to reconcile estimated against actual emissions, complete the part for emissions calculation (lines 1 - 5) and then proceed to the part for fee calculation (lines 21 - 26). A final permit or permit revision will not be issued until all fees, interest, and penalties assessed against a source are paid. In addition, the initial application for a source will not be found complete unless the source pays all fees owed.

**EMISSIONS CALCULATION**

1	Sum the subtotals from section D of this form and enter the result on this line.	15
2.	Sum the subtotals from section E of this form and enter the result on this line.	0
3.	Total lines 1 and 2 and enter the result on this line.	15
4.	Sources are not required to pay fees twice for the same emissions [see § 71.9(c)(5)(ii)]. Enter the amount of emissions that were counted twice. Attach supplementary information identifying the emissions units where double counting has occurred and explain why double counting has occurred. If there has been no double counting enter "0."	0
5.	Subtract the amount on line 4 from the amount on line 3, round to the nearest ton, and enter the result on this line.	15

**RECONCILIATION OF ESTIMATED EMISSIONS AGAINST ACTUAL EMISSIONS  
(WHEN INITIAL ESTIMATES WERE BASED ON THE CURRENT CALENDAR YEAR)**

Only complete this part of the worksheet (lines 6 - 10) if you are now preparing the first annual fee worksheet and the initial fee worksheet included estimated emissions for the current calendar year. See §§ 71.9(e)(2) and 71.9(h)(3). Otherwise skip this part of the form and proceed to the next part of the form (starting at line 11) or to the fee calculation part of the form (starting at line 21).

6.	Enter the total estimated emissions previously reported on line 5 of the initial fee calculation worksheet. These are estimated emissions for the year that the initial fee worksheet was submitted.	_____
	If the amount on line 5 of this form is greater than the amount on line 6, subtract line 6 from line 5, and enter the result on this line. Otherwise enter "0."	_____
8.	If the amount on line 6 is greater than the amount on line 5, subtract line 5 from line 6, and enter the result on this line. Otherwise enter "0."	_____
9.	Multiply the amount on line 7 by (last year's \$/ton amount), <sup>1</sup> and enter the result on this line. This is the amount of underpayment. Go to line 21.	\$ _____
10.	Multiply the amount on line 8 by (last year's \$/ton amount), and enter the result on this line. This is the amount of overpayment. Go to line 21.	\$ _____

<sup>1</sup> \$/ton amounts to be determined at the time of program implementation, see § 71.9(c)(1) - (3).

**RECONCILIATION OF ESTIMATED EMISSIONS AGAINST ACTUAL EMISSIONS  
(WHEN INITIAL ESTIMATES WERE BASED ON THE PRECEDING CALENDAR YEAR)**

Only complete this part of the worksheet (lines 11 - 20) if you are now preparing the first annual fee worksheet and the initial fee worksheet included estimated emissions for the preceding calendar year. See §§ 71.9(f)(2) and 71.9(h)(3). If you must complete this part of the form, you must also submit annual emission reports (sections D and E) for the year preceding initial worksheet submittal. Otherwise skip this part of the form and proceed to the fee calculation part of the form (lines 21 through 26).

11.	Sum the subtotals from section D for the calendar year preceding initial fee worksheet submittal and enter the result on this line.	_____
12.	Sum the subtotals from section E for the calendar year preceding initial fee worksheet submittal and enter the result on this line.	_____
13.	Total lines 11 and 12 and enter the result on this line. This is the total actual emissions for the calendar year preceding initial fee worksheet submittal.	_____

**RECONCILIATION OF ESTIMATED EMISSIONS AGAINST ACTUAL EMISSIONS  
(WHEN INITIAL ESTIMATES WERE BASED ON THE PRECEDING CALENDAR YEAR)  
--- CONTINUED ---**

14. Sources are not required to pay fees twice for the same emissions [see § 71.9(c)(5)(ii)]. Enter the amount of emissions (actual emissions for the year preceding initial worksheet submittal) that were counted twice. Attach supplementary information identifying the emissions units where double counting has occurred and explain why double counting has occurred. If there has been no double counting enter "0."
15. Subtract the amount on line 14 from the amount on line 13, round to the nearest ton, and enter the result on this line.
16. Enter the total estimated emissions previously reported on line 5 of the initial fee calculation worksheet. These are estimated emissions for the calendar year preceding initial fee worksheet submittal.
17. If the amount on line 15 is greater than the amount on line 16, subtract line 16 from line 15, and enter the result on this line. Otherwise enter "0."
18. If the amount on line 16 is greater than the amount on line 15, subtract line 15 from line 16, and enter the result on this line. Otherwise enter "0."
19. Multiply the amount on line 17 by (last year's \$/ton amount)<sup>1</sup> and enter the result on this line. This is the amount of underpayment.
20. Multiply the amount on line 18 by (last year's \$/ton amount) and enter the result on this line. This is the amount of overpayment.

**FEE CALCULATION**

21. Multiply the amount on line 5 on this form by (this year's \$/ton amount) and enter the result on this line.
22. If you have reconciled estimated against actual emissions, enter the underpayment from line 9 or 19 on this line. Otherwise enter "0."
23. If you have reconciled estimated against actual emissions, enter the overpayment from line 10 or 20 on this line. Otherwise enter "0."
24. If the amount on line 22 is greater than "0," add this amount to the amount on line 21 and enter the result on this line. If the amount on line 23 is greater than "0," subtract this amount from the amount on line 21 and enter the result on this line. Otherwise enter the amount on line 21 on this line. This is the fee adjusted for reconciliation.
25. If your account was credited for fee assessment error [see § 71.9(j)] since the last time you submitted a fee calculation worksheet, enter the amount of the credit on this line. Otherwise enter "0."
26. Subtract the amount on line 25 from the amount on line 24 and enter the result on this line. Stop here. This is the total fee amount that you must remit to EPA.

**PENALTIES AND INTEREST**

Payment received later than the due date shall be assessed interest and, in certain cases, penalty charges. If payment is late, do not calculate penalties and interest at this time. The permitting authority will assess these and mail you an invoice.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**FORM I-COMP - INITIAL COMPLIANCE PLAN & COMPLIANCE CERTIFICATION**

INSTRUCTIONS: There are 3 pages to this form. On this page, complete Sections A, B and C for each applicable. If different portions of an applicable requirement or compliance methods vary from unit to unit, prepare a separate form for each unique set of requirements, methods, and units. For compliance plan purposes, assume permit issuance will occur by March 22, 2001, unless you are not required to submit an application until after March 22, 2000, in which case assume issuance will occur no later than 18 months after submittal.

**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement	Unit ID(s):	Compliance status at time of application:
PSD-ML-R50005-03-01, Section 4, 1.a. NOx emission rate. Limit NOx emissions at all times to no greater than 6.55 grams per brake horsepower-hour (g/BHP-hr) per engine, expressed as NO2, averaged over the duration of the emission performance test or any three consecutive hours.	001, 002, 003	<input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance

**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Initial performance testing conducted on July 12 and 13, 2005 demonstrated compliance with NOx emission limits.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ___ / ___ / ___	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement	Unit ID(s):	Compliance status at time of application:
PSD-ML-R50005-03-01, Section 4, 1.b. NOx emission rate. Limit NOx emissions at all times to no greater than 37.44 pounds per hour (lb/hr) per engine, expressed as NO2, averaged over the duration of the emission performance test or any three consecutive hours.	001, 002, 003	<input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance

**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Initial performance testing conducted on July 12 and 13, 2005 demonstrated compliance with NOx emission limits.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ___ / ___ / ___	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**FORM I-COMP - INITIAL COMPLIANCE PLAN & COMPLIANCE CERTIFICATION**

**INSTRUCTIONS:** There are 3 pages to this form. On this page, complete Sections A, B, and C for each applicable requirement. If different portions of an applicable requirement or compliance methods vary from unit to unit, prepare a separate form for each unique set of requirements, methods, and units. For compliance plan purposes, assume permit issuance will occur by March 22, 2001, unless you are not required to submit an application until after March 22, 2000, in which case assume issuance will occur no later than 18 months after submittal.

**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center"><small>Cite and Describe the Applicable Requirement</small></p> <p>PSD-ML-R50005-03-01, Section 4, i. c. NOx emission limit. Limit NOx emissions to no greater than 14.98 tons per year (tpy) per engine, expressed as NO2, calculated based on a 12-month rolling sum. During the first 12 months after commencing operation, cumulative NOx emissions shall not exceed 14.98 tons per engine. Starting in the 13<sup>th</sup> calendar month after commencing operation, NOx emissions shall not exceed 14.98 tons per consecutive 12-month period per engine. Compliance with this limit shall be based on a rolling sum of monthly emissions during the previous 12 months.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Compliance with the NOx emission limit is calculated monthly based on monthly operating hours and the NOx emission rate determined by performance testing.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center"><small>Cite and Describe the Applicable Requirement</small></p> <p>PSD-ML-R50005-03-01, Section 4, i. d. Engine operating hours. Limit operating hours of EU 001, 002, and 003 to no greater than 800 hours per year based on a 12-month rolling sum. During the first 12 months after commencing operation, operating hours of EU 001, 002, and 003 shall not exceed 800 hours each. Starting in the 13<sup>th</sup> calendar month after commencing operation, operating hours of EU 001, 002, and 003 shall not exceed 800 hours per consecutive 12-month period. Compliance with that limit shall be based on a rolling sum of monthly operating hours during the previous 12 months.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Compliance with the operating hours limit is calculated monthly based on run data from the engines.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 4, 1. e. Turbocharger and aftercooler operation. Use a turbocharger and aftercooler at all times during operation of EU 001, 002, and 003.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with this requirement)**

An alarm would alert the operator if the aftercooler or turbocharger were not operating. Engine run data is reviewed monthly to ensure compliance.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 4, 1. f. Maintain the aftercooler return water temperature for each engine at less than or equal to 140 degrees Fahrenheit.</p>	<p align="center">Unit ID(s):</p> <p>001. 002. 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with the requirement)**

An alarm would alert the operator if the aftercooler return water temperature exceeded 140 degrees F. Engine run data is reviewed monthly to ensure compliance.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement	Unit ID(s):	Compliance status at time of application:
PSD-ML-R50005-03-01, Section 4, 1. g. Continuously monitor the aftercooler water temperature for EU 001, 002, and 003. The temperature shall be controlled by thermostatic valves that maintain a 140 degrees F return water temperature to the engine.	001, 002, 003	<input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance

**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

The aftercooler water temperature is continuously monitored and recorded. An alarm would alert the operator if the return water temperature exceeded 140 degrees F.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ____ / ____ / ____	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement	Unit ID(s):	Compliance status at time of application:
PSD-ML-R50005-03-01, Section 4, 1. h. Combustion operation. Operate EU 001, 002, and 003, at all times using lean burn combustion conditions for each engine.	001, 002, 003	<input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance

**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

The engines are designed and operated using lean burn combustion conditions.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ____ / ____ / ____	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 4, 1. i. Maintain the intake manifold pressure at 28.1 to 76.2 inches of mercury (Hg) for 40 to 100% load for each engine. Each engine shall operate only between 40 to 100% load.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Intake manifold pressure is monitored continuously. An alarm would alert the operator if the intake manifold pressure is outside the specified limits. The manufacturer's published tolerance limit for the pressure gage is +/- 10% due to variations in ambient air and fuel used. The engine is guaranteed to meet its emission standards within these tolerance limits. Although the intake manifold pressure has occasionally exceeded the permit limits, it has never exceeded the tolerance limits of the pressure gage.

**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 4, 1. j. Continuously monitor the intake manifold pressure for EU001, 002, and 003.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

The intake manifold pressure is continuously monitored for each engine. An alarm would alert the operator if the intake manifold pressure is not within the limits when the engine is operating between 40 and 100 percent load.

**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement	Unit ID(s):	Compliance status at time of application:
PSD-ML-R50005-03-01, Section 4, 1. k. Retard engine timing. At all times operate EU 001, 002, and 003, which involves delaying the injection of fuel in the engine.	001, 002, 003	<input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance

**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

The engines are designed and operated with retard engine timing.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ___ / ___ / ___	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement	Unit ID(s):	Compliance status at time of application:
PSD-ML-R50005-03-01, Section 4, 1. l. Set the flash file program #180-1736, which electronically controls each engine, for retard engine timing. Contact the EPA before modifying any parameters pertaining to retard engine timing for any of the engines.	001, 002, 003	<input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance

**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

The engines are designed and operated with flash file #180-1736. There have been no modifications to the engines' flash files.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ___ / ___ / ___	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 4, 1. m. Maintain records, which include printouts of digital readouts, gauges, or meters, for times in which the flash file program #180-1736 is modified and any times in which any retard engine timing parameters have been changed.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

The flash file #180-1736 and retard engine timing parameters have not been changed for any of the engines.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 4, 1. n. Compliance Test. Conduct performance testing on EU 001, 002, and 003 to ascertain compliance with the NOx emission rates and limits in this section in accordance with the requirements set forth in Section 5 of this permit. Determine the NOx emission rate, expressed as NO2, using exhaust properties determined by both Method 19 and exhaust gas measurements as set out in Section 5 and Section 6.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Performance testing was completed on July 12 and 13, 2005 and demonstrated compliance with the NOx emission rates and limits.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement PSD-ML-R50005-03-01, Section 4, 1. o. Certify that electronic controls are set for low emission strategy as required by Conditions 1(e)-(m) in accordance with the requirements in Section 8.	Unit ID(s): 001, 002, 003	Compliance status at time of application: <input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

The engines are designed and operated using a low emission strategy. Reports and documents, including this permit application, have been certified when submitted.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ____ / ____ / ____	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement PSD-ML-R50005-03-01, Section 4, 1. p. De minimis Pollutants. Conduct performance tests, upon request of the EPA, for SO <sub>2</sub> , VOCs, CO, PM, PM <sub>10</sub> , and HAPs in order to determine whether the actual emission levels represent the limited potential emissions estimated in Table 1 in Section 2 of this [PSD] permit.	Unit ID(s): 001, 002, 003	Compliance status at time of application: <input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Grand Casino Hinckley has not been requested by EPA to conduct performance tests for SO<sub>2</sub>, VOCs, CO, PM, PM<sub>10</sub> or HAPs.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ____ / ____ / ____	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Initial Compliance Test. Within 60 days after achieving the maximum production rate at which the affected Facility will be operated, but not later than 180 days after initial startup of EU 001, 002, and 003, and at such other times as may be required by the EPA under section 114 of the Act, the owner or operator shall conduct performance test(s) for NOx on each engine to ascertain compliance with the emission limits in Section 4 and furnish the EPA a written report of the results.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with this requirement)**

Performance testing for NOx emissions was conducted on July 12 and 13, 2005. A written report was submitted to EPA with the test results.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Periodic Performance Tests. The owner or operator shall conduct performance test(s) every three (3) calendar years, starting three years after the initial compliance test (at about the anniversary of the initial performance test), to determine compliance with the applicable NOx emission limits in Section 4 and furnish the EPA with a written report of the results.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with the requirement)**

Initial performance testing was conducted July 12 and 13, 2005. Periodic performance tests will be conducted in 2008.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**FORM I-COMP - INITIAL COMPLIANCE PLAN & COMPLIANCE CERTIFICATION**

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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement PSD-ML-R50005-03-01, Section 5. Test Reports. Within 45 days after completion of a set of tests, the owner or operator shall submit a copy of the results to the EPA.	Unit ID(s): 001, 002, 003	Compliance status at time of application: <input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

The test report for the initial performance testing was submitted within 45 days of July 13, 2005.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ___ / ___ / ___	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement PSD-ML-R50005-03-01, Section 5. Reference Test Methods. The owner or operator shall test EU 001, 002, and 003 for emissions of nitrogen compounds in accordance with the methods and procedures specified in Method 19 of 40 CFR 60, Appendix A for testing nitrogen oxide emissions, unless otherwise approved in advance by the EPA.	Unit ID(s): 001, 002, 003	Compliance status at time of application: <input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Method 7E was approved in advance by EPA for testing NOx emissions during the initial performance test.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ___ / ___ / ___	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Testing Notification. Written notification of the planned test date shall be postmarked or received by the EPA at least 30 days before the planned test date. The EPA shall reject the results of a test if less than 30 days notice is given unless written authorization of a shorter notice was given by the EPA Regional office.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Written notification of proposed test dates was submitted to EPA and approved. EPA attended the initial performance tests.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Test Plans. Within 60 days after receiving a request from EPA for inspections, monitoring, and/or entry under section 114 of the Act, and at least 30 days before the scheduled date of any tests, the owner or operator shall submit a complete plan for conducting the source tests to the EPA for approval. The plan must address the methods and procedures to be used for sampling, testing, and quality assurance, and the operational conditions under which the tests will be performed and documented. Failure to submit a complete plan shall not alter the date by which any test is required.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

A test plan for the initial performance tests was submitted to EPA prior to testing. EPA approved the test plan.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Approval of Test Plan. The owner or operator shall submit to the EPA a test plan with or in advance of the test notification required under this section or in response to the EPA's request for supplemental information. If the proposed test plan does not contain sufficient or accurate enough detail to ensure that the performance test meets the requirements of the applicable requirement or compliance document, EPA may reject the plan, and the owner or operator must address any of EPA's comments on revisions and additions that are necessary to make the plan complete.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

A test plan for the initial performance tests was submitted to EPA prior to testing. EPA approved the test plan.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ____ / ____ / ____</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Format and content of test plan. The test plan shall be submitted in the format and include the elements specified in the PSD permit.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

A test plan for the initial performance tests was submitted to EPA prior to testing. EPA approved the test plan.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ____ / ____ / ____</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Pretest meeting. The owner or operator shall contact EPA Region 5 to schedule a pretest meeting to be held between authorized employees of the agency and the owner or operator of the facility. The pretest meeting shall be held at least seven days prior to the performance test date except that a shorter period shall be allowed if the EPA is able to accommodate a request for such a meeting. If the EPA agrees that an in-person meeting is not necessary, the pretest meeting will be conducted by telephone conference call unless the owner or operator of the emission facility requests and in-person meeting.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with this requirement)**

EPA Region 5 was contacted to schedule a pretest meeting prior to the initial performance tests. An in-person meeting was deemed unnecessary and the meeting was conducted by telephone.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Representative Testing Conditions. Performance tests shall be conducted under such conditions as the EPA shall specify to the operator based on representative performance of the affected facility. The owner or operator shall make available to the EPA such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with the requirement)**

The initial performance tests were conducted under representative engine operating conditions.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Operating Conditions for Performance Testing. All performance tests shall be conducted at worst case operating (non-malfunction) conditions for all emission units for each air pollutant that is required to be tested unless: 1. the applicable requirement or compliance document specifies alternative operating conditions for performance testing; or 2. the worst case condition is not known or calculable. In this case, worst case conditions shall be assumed to be the maximum achievable process or operating rate of the emissions unit.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Initial performance testing was conducted at the maximum operating rate for each engine.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Test Runs. Unless otherwise specified by the applicable Reference Test Method, each performance test shall consist of three separate runs. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the EPA's approval, be determined using the arithmetic mean of the results of the two other runs.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

During the initial performance test for NOx emissions, the results of the second test run were not used because of particulate loading on the in-stack filter caused a loss of flow to the analyzers resulting in invalid readings. A fourth run was conducted and the results were averaged over the three valid test runs.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Failure to demonstrate compliance. Upon the EPA's written notice that the facility has failed to demonstrate compliance with an applicable emissions limit, the owner or operator of the emission facility, unless an alternative schedule is given in an applicable requirement or compliance document, shall: 1. Conduct a retest within 30 days of receipt of the EPA written notice; 2. Submit to the EPA written notice of testing, submit a test plan for the retest, and schedule a pretest meeting at least 21 days in advance of the date of the retest. The pretest meeting shall be held at least 7 days prior to the date of the retest. 3. Submit a complete report of the results with 45 days.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Grand Casino Hinckley demonstrated compliance with NOx emission rates and limits during the initial performance test.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___/___/___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 5. Extension - Failure to demonstrate compliance. The owner or operator may receive an extension to the schedule if one of the following special circumstances applies: 1. Seasonal or temporary shutdown of the affected emissions units; 2. Malfunction or breakdown of the affected units; 3. Weather conditions that prevent using the applicable test methods or prevent operation of the affected emission units at the required operating conditions. 4. Any other condition beyond the control of the owner or operator that prevent using the applicable test methods or prevent operation of the affected units at the required operating conditions or completion of a retest within the required schedule.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Grand Casino Hinckley demonstrated compliance with NOx emission rates and limits during the initial performance test.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___/___/___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center"><i>Cite and Describe the Applicable Requirement</i></p> <p>PSD-ML-R50005-03-01, Section 5. Request for a Retest Extension. Any request for an extension of the time schedule shall be submitted to the EPA in writing by the owner or operator prior to the date by which retesting is required. The request shall specify the reason why the extension is needed, and include an alternative retest schedule. The EPA shall grant the request for extension if the EPA finds that one or more of the special conditions apply. A requested extension shall not be effective unless the EPA has given written approval of the extension.</p>	<p align="center">Unit ID(s): 001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with this requirement)**

Grand Casino Hinckley demonstrated compliance with NOx emission rates and limits during the initial performance test.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ____/____/____</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT (Describe each applicable requirement and determine its compliance status)**

<p align="center"><i>Cite and Describe the Applicable Requirement</i></p> <p>PSD-ML-R50005-03-01, Section 5. Agency tests. Upon request of the EPA, the owner or operator of an emission facility shall allow the EPA, or any authorized employee or agent of the EPA, to enter upon the premises for the purposes of conducting performance tests. The owner or operator shall provide performance testing facilities that enable the EPA to conduct performance tests. The owner or operator shall operate the emission facility at worst case operating conditions as requested by the EPA and shall provide assistance as requested.</p>	<p align="center">Unit ID(s): 001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE (Describe all methods you used to determine compliance with the requirement)**

EPA has not requested to conduct additional performance tests.

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**C. COMPLIANCE PLAN STATEMENTS (Respond to one of these statements for this applicable requirement)**

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No    Expected Date ____/____/____</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes    <input type="checkbox"/> No</p>
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

**FORM I-COMP - INITIAL COMPLIANCE PLAN & COMPLIANCE CERTIFICATION**

**INSTRUCTIONS:** There are 3 pages to this form. On this page, complete Sections A, B, and C for each applicable requirement. If different portions of an applicable requirement or compliance methods vary from unit to unit, prepare a separate form for each unique set of requirements, methods, and units. For compliance plan purposes, assume permit issuance will occur by March 22, 2001, unless you are not required to submit an application until after March 22, 2000, in which case assume issuance will occur no later than 18 months after submittal.

**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 6. Annual Testing. The owner or operator shall measure NOx emissions annually (at about the anniversary of the initial compliance test) using a portable emissions analyzer to determine compliance with the applicable NOx emissions limits and furnish the EPA with a written report of the results. The portable emissions analyzer shall be used according to the Portable Electrochemical Analyzer Procedure in Attachment 2 of the PSD permit. This requirement does not apply during the calendar years in which a performance test is required, only during years between the periodic performance tests.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Grand Casino Hinckley will comply with annual testing requirements in 2006, and other years between periodic performance tests.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 6. Test Reports. Within 45 days after completion of NOx emissions measurements, the owner or operator shall submit a copy of the results to the EPA.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Grand Casino Hinckley will comply with this requirement following annual testing.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___ / ___ / ___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 6. Operating Conditions. All measurements shall be conducted at worst case operating (non-malfunction) conditions for all emission units that are required to be tested unless: 1. the applicable requirement or compliance document specified alternative operating conditions for annual testing using a portable emissions analyzer; or 2. the worst case condition is not known or calculable. In this case, worst case conditions shall be assumed to be the maximum achievable process or operating rate of the emissions unit.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Grand Casino Hinckley will comply with this requirement during annual testing.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___/___/___</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 6. Measurement Cycles. Each test shall consist of at least 4, but no more than 6, 15-minute measurement cycles. For the purpose of determining compliance with the applicable standard, the results of all measurement cycles will be averaged. In the event that conditions occur in which one of the measurement cycles must be discontinued because of forced shutdown, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, EPA may, determine compliance using the arithmetic mean of the results of the non-damaged measurement cycles.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Grand Casino Hinckley will comply with this requirement during annual testing.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___/___/___</p>	<p>3. For future-effective requirements, I will meet this requirement on a timely basis.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 7. Notification of Construction and Startup. The owner or operator shall furnish EPA written notification as follows: a. A notification of the date when construction or installation commences of EU 001, 002, and 003 postmarked no later than 30 days after such date. B. A notification of the actual date of initial startup of EU 001, 002, and 003 postmarked within 15 days after such date.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Grand Casino Hinckley submitted written notifications of construction and startup.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___/___/___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

<p align="center">Cite and Describe the Applicable Requirement</p> <p>PSD-ML-R50005-03-01, Section 7. Record keeping. The owner or operator shall maintain at the facility at which the permitted units are located a file containing the records specified in the PSD permit. The owner or operator shall retain all records at the facility location for at least 5 years following the creation of such record.</p>	<p align="center">Unit ID(s):</p> <p>001, 002, 003</p>	<p align="center">Compliance status at time of application:</p> <p><input checked="" type="checkbox"/> In Compliance</p> <p><input type="checkbox"/> Not In Compliance</p>
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

Grand Casino Hinckley keeps records as required by the PSD permit. Engine run data including aftercooler return water temperature, intake manifold pressure, and hours of operation are downloaded and reviewed each month. Copies of performance test data and excess emissions reports are on file.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Expected Date ___/___/___</p>	<p>3. For future-effective requirements. I will meet this requirement on a timely basis.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement PSD-ML-R50005-03-01, Section 8. Compliance Certification Report. The compliance certification shall be certified by the responsible official and shall include the information specified in the PSD permit.	Unit ID(s): 001, 002, 003	Compliance status at time of application: <input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with this requirement)

Grand Casino Hinckley will submit a compliance certification by January 30<sup>th</sup> beginning in 2006.

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ____ / ____ / ____	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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**A. COMPLIANCE STATUS OF EACH APPLICABLE REQUIREMENT** (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement	Unit ID(s):	Compliance status at time of application: <input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance
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**B. METHODS USED TO DETERMINE COMPLIANCE** (Describe all methods you used to determine compliance with the requirement)

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**C. COMPLIANCE PLAN STATEMENTS** (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply.  <input type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance.  <input type="checkbox"/> Yes <input type="checkbox"/> No    Expected Date ____ / ____ / ____	3. For future-effective requirements. I will meet this requirement on a timely basis.  <input type="checkbox"/> Yes <input type="checkbox"/> No
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INSTRUCTIONS: Complete sections E, F, and G once for each facility.

**F. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS**

This section need only be prepared if you are required to submit one or more schedules of compliance (by completing section E) or if an applicable requirement requires you to submit a progress report. For most sources, the time frame for submittal of progress reports will be at least every 6 months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe)

\_\_\_\_\_

Report Starting date \_\_\_/\_\_\_/\_\_\_ Submittal Frequency \_\_\_\_\_

Contents of Progress Report (describe)

\_\_\_\_\_

Report Starting date \_\_\_/\_\_\_/\_\_\_ Submittal Frequency \_\_\_\_\_

**G. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS**

This section must be prepared by every source. Indicate how often you are required to submit compliance certifications after your permit is issued and when the first one will be submitted. Compliance certifications are required to be submitted at least once per year during the term of the permit.

Frequency of submittal Annual Beginning 01 / 30 / 2006

**H. COMPLIANCE STATUS FOR ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS**

This section of the form must be completed for every source. Indicate compliance status for the requirement as a whole (to certify compliance with the requirement as a whole, you must be able to certify compliance with each individual requirement that can be categorized under this designation).

Enhanced Monitoring Requirements:     \_\_\_ In Compliance     \_\_\_ Not In Compliance     **Not Applicable**

Compliance Certification Requirements:     X In Compliance     \_\_\_ Not In Compliance