

**CLARK COUNTY
DEPARTMENT OF AIR QUALITY AND
ENVIRONMENTAL MANAGEMENT**

500 South Grand Central Parkway, Box 555210, Las Vegas, Nevada 89155

Part 70 Operating Permit

Source: 257

Issued in accordance with the
Clark County Air Quality Regulations (AQR)

**ISSUED TO: HARRAH'S OPERATING COMPANY, INC.
HARRAH'S CONSOLIDATED PROPERTIES**

SOURCE LOCATIONS:

Harrah's Las Vegas, 3475 Las Vegas Blvd. South
Flamingo Las Vegas, 3555 Las Vegas Blvd. South
Bally's Las Vegas, 3645 Las Vegas Blvd. South
Bill's Gamblin' Hall & Saloon, 3595 Las Vegas Blvd. South
Caesar's Palace, 3570 Las Vegas Blvd. South
Paris Casino Resort, 3655 Las Vegas Blvd. South
Imperial Palace, 3535 Las Vegas Blvd. South, Las Vegas, NV 89109
T21S, R61E, Sections 16, 17 & 21
Hydrographic Basin Number: 212

SOURCE ADDRESS:

One Caesars Palace Drive
Las Vegas, NV 89109

NATURE OF BUSINESS:

SIC Code 7011: Hotels and Motels
NAICS 721120: Casino Hotels

RESPONSIBLE OFFICIAL:

Name: Tom Jenkin
Title: President, Western Division, Harrah's Entertainment, Inc.
Phone: (702) 369-5052
Fax Number: (702) 735-6624

Permit Issuance Date: December 30, 2009

Expiration Date: December 29, 2014

**ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY AND ENVIRONMENTAL
MANAGEMENT**



Tina Gingras
Assistant Director, Clark County DAQEM

EXECUTIVE SUMMARY

Harrah's Operating Company, Inc. (HOC) is a major source for NO_x, synthetic minor source for CO, and minor source for PM₁₀, SO_x, VOC and HAP. The source is located on 1 Caesar's Palace Drive, Las Vegas, Nevada in the Las Vegas Valley airshed, hydrographic basin number 212. Hydrographic basin 212 is nonattainment for CO, PM₁₀, and ozone, and PSD for all other regulated air pollutants. The HOC owns and operates several adjacent and contiguous hotels and casinos grouped under single SIC 7011: Hotels and Motels (NAICS 721120: Casino Hotels). The source is currently operating seven facilities: Harrah's Las Vegas, Flamingo Las Vegas, Bally's Las Vegas, Bill's Gamblin' Hall & Saloon, Caesar's Palace, Paris Casino Resort and Imperial Palace. This is the initial Part 70 Operating Permit for this source.

The following table summarizes the source-wide potential to emit (PTE) for each regulated air pollutant:

PM₁₀	NO_x	CO	SO_x	VOC	HAP
37.32	83.50	65.47	1.80	25.66	13.16

Pursuant to AQR 19.4.2, all terms and conditions in Sections I through VI and the Attachment in this permit are federally enforceable unless explicitly denoted otherwise.

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I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
AST	Aboveground Storage Tank
ATC	Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
Bhp	Brake Horsepower
BCC	Clark County Board of County Commissioners
CAO	Field Corrective Action Order
CARB	California Air Resources Board
CE	Control Efficiency
CEM	Continuous Emissions Monitoring System
CF	Control Factor
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
CPI	Urban Consumer Price Index
DAQEM	Clark County Department of Air Quality & Environmental Management
DEM	Digital Elevation Model
EF	Emission Factor
EO	Executive Order
EPA	United States Environmental Protection Agency
EU	Emission Unit
EVR	Enhanced Vapor Recovery
GDO	Gasoline Dispensing Operation
HAP	Hazardous Air Pollutant
HP	Horse Power
MMBtu	Millions of British Thermal Units
NAC	Nevada Administrative Code
NEI	Net Emission Increase
NO _x	Nitrogen Oxides
NOV	Notice of Violation
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
OP	Operating Permit
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RVP	Reid Vapor Pressure
scf	Standard Cubic Feet
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
TSD	Technical Support Document
UST	Underground Storage Tank
USGS	United States Geological Survey
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. General Requirements

1. The Permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act (Act) and is grounds for enforcement action; for permit termination, revocation and reissuance or modification; or for denial of a permit renewal application. *[AQR 19.4.1.6.a]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. *[AQR 19.4.1.5]*
3. The Permittee shall pay all permit fees pursuant to AQR Section 18. Failure to pay Part 70 permit fees may result in citations or suspensions or revocation of the Part 70 Permit. *[AQR 19.4.1.7]*
4. The permit does not convey any property rights of any sort, or any exclusive privilege. *[AQR 19.4.1.6.d]*
5. The Permittee shall not hinder, obstruct, delay, resist, interfere with, or attempt to interfere with the Control Officer, or any individual to whom authority has been duly delegated for the performance of any duty by the AQR. *[AQR 5.1]*
6. The Permittee owning, operating, or in control of any equipment or property who shall cause, permit, or participate in any violation of the AQR shall be individually and collectively liable to any penalty or punishment imposed by and under the AQR. *[AQR 8.1]*
7. The Permittee shall continue to comply with applicable requirements for which the Permittee is in compliance. *[AQR 19.3.3.8.b]*
8. Any Permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. *[AQR 19.3.2]*
9. The Permittee may request confidential treatment of any records in accordance with AQR Section 19. Emission data, standards or limitations [all terms as defined in 40 CFR 2.301(a)] or other information as specified in 40 CFR 2.301 shall not be considered eligible for confidential treatment. The Administrator and the Control Officer shall each retain the authority to determine whether information is eligible for confidential treatment on a case-by-case basis. *[AQR 19.3.1.3 and 40 CFR 2.301]*

B. Modification, Revision, Renewal Requirements

1. The Permittee shall not make a modification, as defined in AQR Section 0, to the existing source prior to receiving an ATC from the Control Officer. *[AQR 12.1.1.1]*
2. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the Permittee for the permit modification, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[AQR 19.4.1.6.c]*
3. Any request for a permit revision must comply with the requirements of AQR Section 19. *[AQR 19.5]*

4. The Permittee shall not build, erect, install or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR 60.12]*
5. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit, provided the Permittee conforms to the applicable requirements of AQR Sections 12 and 58. *[AQR 19.4.1.11]*
6. For purposes of permit renewal, the Permittee shall submit a timely and complete application. A timely application is one submitted between six (6) months and 18 months prior to the date of permit expiration. *[AQR 19.3.1.1.c]*
7. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with AQR Subsections 19.3.1.1.c and 19.5.2 in which case the permit shall not expire and all terms and conditions of the permit shall remain in effect until the renewal permit has been issued or denied. *[AQR 19.5.3.2]*

C. Compliance Requirements

1. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the Control Officer along with a claim of confidentiality. *[AQR 19.4.1.6]*
2. The Permittee shall allow the Control Officer or an authorized representative, upon presentation of credentials:
 - a. entry upon the Permittee's premises where the source is located, or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - b. access to inspect and copy, at reasonable times, any records that must be kept under conditions of the permit;
 - c. access to inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. access to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. *[AQR 4.3 and 19.4.3.2]*
3. Upon request of the Control Officer, the Permittee shall provide such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use, and such disclosures be certified by a professional engineer registered in the state. In addition to such report, the Control Officer may designate an authorized agent to make an independent study and report as to the nature, extent, quantity or degree of any air contaminants which are or may be discharged from source. An authorized agent so designated is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.4]*

4. The Permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the terms and conditions of this permit. *[AQR 19.4.1.6.b]*
5. Any person who violates any provision of this Operating Permit, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry or monitoring activities or any requirements by DAQEM is guilty of a civil offense and shall pay civil penalty levied by the Air Pollution Control Hearing Board/Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1]*
6. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review as provided in Chapter 233B of NRS. *[AQR 9.12]*
7. The Permittee of any stationary source or emission unit that fails to demonstrate compliance with the emissions standards or limitations shall submit a compliance plan to the Control Officer pursuant to AQR Section 10. *[AQR 10.1]*
8. The Permittee shall comply with the requirements of 40 CFR 61, Subpart M, of the National Emission Standard for Asbestos for all demolition and renovation projects. *[AQR 13.1.7]*

D. Reporting Requirements

1. Requirements for compliance certification with terms and conditions contained in the Operating Permit, including emission limitations, standards, or work practices, are as follows:
 - a. the Permittee shall submit compliance certifications annually in writing to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) and the Administrator at USEPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each year will be due 30 days after the Operating Permit issuance anniversary date;
 - b. compliance shall be determined in accordance with the requirements detailed in AQR 19.4.1.3, record of periodic monitoring, or any credible evidence; and
 - c. the compliance certification shall include:
 - i. identification of each term or condition of the permit that is the basis of the certification;
 - ii. the Permittee's compliance status and whether compliance was continuous or intermittent;
 - iii. methods used in determining the compliance status of the source currently and over the reporting period consistent with Subsection 19.4.1.3; and
 - iv. other specific information required by the Control Officer to determine the compliance status of the source. *[AQR 19.4.3.5]*
2. The Permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*
 - a. The annual emissions inventory shall be submitted to DAQEM no later than March 31 after the reporting year.
 - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.

3. The Permittee shall submit semi-annual monitoring reports to DAQEM based on the following requirements. [19.4.1.3(c)]
 - a. The report shall include a semi-annual summary of each items listed in Recordkeeping Section of each hotel facility.
 - b. The report shall be based on six calendar months, which includes partial calendar months.
 - c. The report shall be received by DAQEM within 30 calendar days after the reporting period.
4. The Permittee shall report to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below [AQR 25.2]:
 - a. within one (1) hour of the onset of the event, the report shall be communicated by phone (702) 455-5942, or by fax (702) 383-9994.
 - b. as soon as practicable but not exceeding ten (10) calendar days from the onset of the event, the detailed written report shall be submitted. Such reports shall include the probable cause of the excess emissions, emission calculations and any corrective actions taken.
5. The Permittee shall report to the Control Officer deviations that do not result in excess emission, with the semi-annual reports. Such reports shall include the probable cause of deviations and any corrective actions or preventative measures taken. [AQR 19.4.1.3]
6. The Permittee shall include a certification of truth, accuracy, and completeness by a responsible official when submitting any application form, report, or compliance certification pursuant to this Operating Permit. This certification and any other certification required shall state, "Based on the information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." This statement shall be followed by the signature and printed name of the responsible official certifying compliance and the date of signature. [AQR 19.3.4]
7. All records and logs, or a copy thereof, shall be kept on-site for a minimum of five (5) years from the date the measurement was taken or data was entered and shall be made available to DAQEM upon request. [AQR 19.4.1.3(b)]
8. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. [AQR 4.4 and AQR 19.4.1.3(c)]

Table II-1: Summary of Required Submission Dates for Various Reports

Required Report	Applicable Period	Due Date ¹
Semi-annual Report for 1st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semi-annual Report for 2 nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	12 Months	30 days after the Operating Permit issuance anniversary date.
Annual Emission Inventory Report	Calendar Year	March 31 each year

Required Report	Applicable Period	Due Date ¹
Excess Emission Notification	As Required	Within one (1) hour of the onset of the event
Excess Emission Report	As Required	As soon as practicable but not to exceed ten (10) calendar days from onset of the event
Deviation Report	As Required	Along with semi-annual reports
Performance Testing	As Required	Within 60 days from the end of the test.

¹. If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal is due on the next regularly scheduled business day.

E. Performance Testing Requirements

1. Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the DAQEM regulations is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. [AQR 4.5]
2. Upon request of the Control Officer, the Permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.6]
3. The Permittee shall submit for approval a performance testing protocol which contains testing, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) not less than 45 nor more than 90 days prior to the anticipated date of the performance test. [AQR 14.10]
4. The Permittee shall submit to EPA for approval any alternative test methods that are not already approved by EPA. [AQR 14.1 and 40 CFR 60.8(b)]
5. The Permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days from the end of the performance test. [AQR 14.12]
6. The Control Officer may require additional or more frequent performance testing. [AQR 4.5]

III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

[Authority for all values, limits, and conditions in this section: NSR ATC 257, Modification 12, Revision 1, (08/24/2009)]

A. HARRAH'S LAS VEGAS

1. Emission Units

Table III-A-1: Summary of Emission Units (EU) – Harrah's Las Vegas

EU	Description
HA06	Bryan Boiler, 4.50 MMBtu/hr, M/N: RV450-S-150-FDG; S/N: 66726 (#5)
HA07	Bryan Boiler, 9.0 MMBtu/hr, M/N: LM900-S-15-FDG, S/N: 66665 (#4)
HA08	Cleaver Brooks Boiler, 8.369 MMBtu/hr, M/N: CB.200-200; S/N: L-70272; (#1)
HA09	Cleaver Brooks Boiler, 8.369 MMBtu/hr, M/N: CB.200-200; S/N: L-70271; (#2)
HA10	Cleaver Brooks Boiler, 8.369 MMBtu/hr, M/N: CB.200-200; S/N: L-70270; (#3)
HA11	Universal Energy Boiler, 4.80 MMBtu/hr, M/N: BF108C; S/N: 10341-1; (#6)
HA12	Caterpillar Emergency Diesel Fire Pump, M/N: 3406BD1, S/N: 6TB06046, 276 kW, 370 hp
HA13	Detroit Diesel Emergency Standby Generator; M/N: 81637416, S/N: 2A98775, 800 kW, 1,232 hp
HA14	Caterpillar Emergency Standby Diesel Generator; MN: 3412, S/N: 81Z09924.0, 600 kW, 890 hp
HA15	Detroit Diesel Emergency Standby Generator; M/N: 71237305, S/N: 12VA069124, 400 kW, 536 hp
HA16	Detroit Diesel Emergency Standby Generator; M/N: 71237305, S/N: 12VA069593, 400 kW, 536 hp
HA17	Detroit Diesel Emergency Standby Generator; M/N: 71237305, S/N: 12VA066655, 400 kW, 536 hp
HA18	Caterpillar Emergency Standby Diesel Generator; M/N: 3412; S/N: 2WJ00740, 880 kW, 1,180 hp
HA19	Baltimore Aircoil Company Series 3000 Cooling Tower, M/N: 3685-2W, S/N: 96201566, 7,200 gpm, 2,520 ppm TDS, 0.005% Drift Loss
HA20	Baltimore Aircoil Company Series 3000 Cooling Tower, M/N: 3685-2W, S/N: 96201567, 7,200 gpm, 2,520 ppm TDS, 0.005% Drift Loss
HA21	Baltimore Aircoil Company Series 3000 Cooling Tower, M/N: 3685-2W, S/N: 96201568, 7,200 gpm, 2,520 ppm TDS, 0.005% Drift Loss
HA23	Global Finishing Solutions Spray Paint Booth, M/N: FP10812.100
HA24	John Deere Emergency Standby Diesel Generator, M/N: 6081AF001, S/N: RG6081A159143, 180 kW, 305 hp
HA25	Murphy-Rogers woodworking operations dust collector, Model MRM-12-4D(42B), S/N: 1839

2. Emission Limitations

- a. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-A-2:

Table III-A-2: PTE (tons per rolling 12-months) - Harrah's Las Vegas

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
HA06	4.50 MMBtu/hr	---	0.15	0.22	0.73	0.01	0.11	0.04
HA07	9.0 MMBtu/hr	6,000 hr/yr	0.20	0.99	1.00	0.02	0.15	0.05
HA08	8.369 MMBtu/hr	20,000 hr/yr	0.63	1.22	3.10	0.05	0.45	0.16
HA09	8.369 MMBtu/hr							
HA10	8.369 MMBtu/hr							
HA11	4.80 MMBtu/hr	5,000 hr/yr	0.09	0.44	0.45	0.01	0.06	0.02

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
HA12	370 hp, 276 kW	36.0 hr/yr	0.01	0.21	0.04	0.01	0.02	0.01
HA13	1,232 hp, 800 kW	36.0 hr/yr	0.02	0.53	0.12	0.01	0.02	0.01
HA14	890 hp, 600 kW	36.0 hr/yr	0.01	0.38	0.09	0.01	0.01	0.01
HA15	536 hp, 400 kW	36.0 hr/yr	0.02	0.30	0.06	0.02	0.02	0.01
HA16	536 hp, 400 kW	36.0 hr/yr	0.02	0.30	0.06	0.02	0.02	0.01
HA17	536 hp, 400 kW	36.0 hr/yr	0.02	0.30	0.06	0.02	0.02	0.01
HA18	1,180 hp, 880 kW	36.0 hr/yr	0.01	0.51	0.12	0.01	0.01	0.01
HA19	7,200 gal/min	---	0.94	0.00	0.00	0.00	0.00	0.00
HA20	7,200 gal/min	---	0.94	0.00	0.00	0.00	0.00	0.00
HA21	7,200 gal/min	---	0.94	0.00	0.00	0.00	0.00	0.00
HA23	7.25 lbs/gal VOC	500 gal/yr	0.00	0.00	0.00	0.00	1.81	1.15
HA24	305 hp, 180 kW	36.0 hr/yr	0.01	0.17	0.04	0.01	0.01	0.01
HA25	3,900 cfm	2,080 hr/yr	0.70	0.00	0.00	0.00	0.00	0.00

- b. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

3. Production Limitations

- a. The Permittee shall limit operation of the 9.0 MMBtu/hr Bryan boiler to 6,000 hours per rolling 12-months (EU: HA07).
- b. The Permittee shall limit operation of the three 8.369 MMBtu/hr Cleaver Brooks boilers to as a group to 20,000 hours a rolling 12-months (EUs: HA08, HA09, and HA10).
- c. The Permittee shall limit operation of the 4.80 MMBtu/hr Universal Energy boiler to 5,000 hour per rolling 12-months (EU: HA11).
- d. The Permittee shall install fuel meters to verify the actual fuel usage and actual heat inputs on each boiler (EUs: HA07 through HA11, inclusive).
- e. The Permittee shall limit operation of the 370 hp Caterpillar emergency diesel fire pump to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: HA12).
- f. The Permittee shall limit operation of the 1,232 hp Detroit emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: HA13).
- g. The Permittee shall limit operation of the 890 hp Caterpillar emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: HA14).
- h. The Permittee shall limit operation of each of the three 536 hp Detroit emergency standby diesel generators to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: HA15 through HA17, inclusive).
- i. The Permittee shall limit operation of the 1,180 hp Caterpillar emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: HA18).
- j. The Permittee shall limit operation of the 305 hp John Deere emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: HA24).

- k. The Permittee shall limit the consumption of VOC and HAP-containing paints, lacquers, thinners, solvents, etc. for surface coating purposes at the Harrah's Las Vegas Hotel and Casino not to exceed either 50.0 gallons per month or 500 gallons per rolling 12-months based on a weighted average VOC content of 7.25 pounds per gallon (EU: HA23).
- l. The Permittee shall not allow woodworking operations to exceed 2,080 hours per rolling 12-months (EU: HA25).

4. Control Requirements

Boilers/Water Heaters

- a. The Permittee shall combust only natural gas in all boilers/heaters.
- b. The Permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's specifications.
- c. The Permittee shall equip the three 8.369 MMBtu/hr Cleaver Brooks boilers with low-NO_x burners (EUs: HA08 through HA10, inclusive). Each boiler shall emit no more than 12 ppm NO_x and no more than 50 ppm CO (corrected to 3 percent oxygen) during operation.
- d. The Permittee shall equip the 9.0 MMBtu/hr Bryan boiler with a low-NO_x burner (EU: HA07). The boiler shall emit no more than 30 ppm NO_x and no more than 50 ppm CO (corrected to 3 percent oxygen) during operation.
- a. The Permittee shall equip the 4.5 MMBtu/hr Bryan boiler with a low-NO_x burner (EU: HA06). The boiler shall emit no more than 9 ppm NO_x and no more than 50 ppm CO (corrected to 3 percent oxygen) during operation.
- e. The Permittee shall equip the 4.80 MMBtu/hr Universal Energy boiler with a low-NO_x burner (EU: HA11). The boiler shall emit no more than 30 ppm NO_x and no more than 50 ppm CO (corrected to 3 percent oxygen) during operation.

Diesel Generators/Fire Pumps

- f. The Permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's specifications. All diesel generators and fire pumps shall combust only low sulfur (<0.05 percent) diesel fuel.
- g. The Permittee shall equip the Caterpillar emergency diesel fire pump with a turbocharger (EU: HA12).
- h. The Permittee shall equip each of the six emergency standby diesel generators with turbochargers (EUs: HA13 through HA18, inclusive).
- i. The Permittee shall equip John Deere emergency standby diesel generators with turbochargers and aftercoolers (EU: HA24).

Cooling Towers

- j. The Permittee shall operate and maintain all cooling towers in accordance with the manufacturer's specifications. No chromium-containing compounds shall be used for water treatment. [40 CFR 63, Subpart Q]
- k. The Permittee shall equip each of the three BAC cooling towers with drift eliminators with a manufacturer's maximum drift rate of 0.005 percent (EU: HA19 through HA21, inclusive).
- l. The Permittee shall maintain the cooling water such that the maximum TDS content shall not exceed 2,520 ppm (EUs: HA19 through HA21, inclusive).

Surface Coating

- m. The Permittee shall not operate spray booths unless all exhaust air passes through appropriate filter media having a particulate capture efficiency of at least 99.0 percent. (This is usually accomplished with tacky filter material that is at least 2 inches thick.) The dry filter media must cover all openings in the spray booth.
- n. The Permittee shall not use open containers for storage or disposal of VOC or HAP-containing cloth or paper (excluding masking tape) used for surface preparation and cleanup.
- o. All filters or other control equipment associated with surface coating operations shall follow manufacturer's specifications for use and operation. Dry filters must be changed at sufficient intervals to prevent a decrease in their effectiveness and prevent them from clogging.
- p. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water), unless the manufacturer's specifications for use indicate a different pressure drop value.
- q. The Permittee shall clean surface coating application equipment in an enclosed container to minimize VOC volatilization into the ambient air.
- r. All containers with VOC and HAP-containing products shall remain securely closed, except during product transfer. Containers shall be inspected regularly for leakage and the contents of any leaking container must be immediately transferred to an appropriately labeled container that has been specifically designed for storage of the compound.
- s. The Permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding, blasting, surface preparation, etc. carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time.

Woodworking

- t. The Permittee shall connect all wood working processes including cutting, sanding, blasting, and surface preparation to a dust collection system (EU: HA25) at all times when such equipment is in operation and the PM₁₀ emissions shall be controlled by a fabric filter or device with equivalent or better control efficiency. [AQR 19.4.1.1]

Other

- u. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.

5. Monitoring

- a. The Permittee shall install and utilize non-resettable hour meters such that the actual operating hours can be established for each applicable boiler (EUs: HA07, HA08, HA09, HA10, HA11). [AQR 19.4.1.3]
- b. The Permittee shall monitor operating hours for each applicable diesel engine utilizing non-resettable hour meters when operated for testing, maintenance, or during emergencies. (EUs: HA12, HA13, HA14, HA15, HA16, HA17, HA18, HA24). [AQR 19.4.1.3]

- c. The Permittee shall perform visual emissions checks each calendar quarter on a source-wide level for each emission unit. The quarterly visual checks shall include the boilers, diesel-fired emergency standby generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency standby generators or fire pumps does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3]
- d. The Permittee shall monitor the TDS in the cooling tower circulating water monthly. The Permittee may use Myron L Ultrameter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 19.4.1.3]

6. Testing

- a. The Permittee operating a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr but less than 10.0 MMBtu/hr shall perform a burner efficiency test at least once each calendar year. Burner efficiency tests shall be conducted in accordance with the manufacturer's specifications and specifications for good combustion practices (EUs: HA06, HA07, HA08, HA09, HA10, and HA11). [AQR 19.4.1.3]
- b. If the documented actual hours of operation of a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr are zero (0) during a calendar year, the Permittee may choose not to perform a burner efficiency test on that boiler during that calendar year. To document that the actual hours of operation for that boiler are zero (0) during a calendar year, the Permittee shall install an hour meter prior to the beginning of that calendar year and maintain written records to verify the actual hours of operation during that calendar year. [AQR 19.4.1.3]
- c. A performance test conducted in accordance with AQR Subsection 49.4 may replace a required burner efficiency test as approved by the Control Officer. [AQR 19.4.1.3]
- d. Testing of diesel emergency standby generators shall not take place during CO advisories. It is the Permittee's responsibility to satisfy all federal requirements to which this facility is subject.

7. Recordkeeping

- a. The Permittee shall maintain records on site that include, at minimum, the following information [AQR 19.4.1.3(b)]:
 - i. monthly hour meter readings of each of the boilers/water heaters (EUs: HA07, HA08, HA09, HA10, and HA11);
 - ii. daily hour meter readings of each diesel emergency standby generator when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: HA13, HA14, HA15, HA16, HA17, HA18, and HA24);
 - iii. daily hour meter readings of each diesel fire pump when operated for testing and maintenance purposes, and separately for use during emergencies (EU: HA12);
 - iv. a log of hour and fuel meter resets if a programmable meter is used;
 - v. MSDS or records demonstrating the VOC and HAP content for each compound used for surface coating activities;

- vi. sulfur content of diesel fuel certified by the supplier;
 - vii. monthly hours of operation of each cooling tower (EUs: HA19, HA20, and HA21);
 - viii. monthly TDS content of cooling tower circulation water;
 - ix. a log book of all inspections, maintenance, and repairs as specified in this document; and
 - x. records of burner efficiency and performance testing as specified in this permit.
- b. The Permittee shall maintain on site and report the following information semi-annually [AQR 19.4.1.3(b)]:
- i. monthly total of operating hours to demonstrate compliance with the 12-month rolling hour limits for each boiler/water heater (EUs: HA07, HA08, HA09, HA10, and HA11);
 - ii. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each diesel generator and fire pump (EUs: HA12, HA13, HA14, HA15, HA16, HA17, HA18, and HA24);
 - iii. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to surface coating activities (paints, basecoats, primers, reducers, thinners, solvents, etc.); and
 - iv. monthly and rolling 12-month total hours of woodworking operations (EU: HA25)
- c. For all Inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 19.4.1.3]

B. FLAMINGO LAS VEGAS

1. Emission Units

Table III-B-1: Summary of EU – Flamingo Las Vegas

EU	Description
FL01	Johnston Boiler, 14.343 MMBtu/hr, M/N: 8786, S/N: 9180-01
FL02	Kewanee Boiler, 14.645 MMBtu/hr, M/N: H3S-350-G, S/N: 10016
FL03	Kewanee Boiler, 14.645 MMBtu/hr, M/N: H3S-350-G, S/N: 10017
FL04	Kewanee Boiler, 14.645 MMBtu/hr, M/N: H3S-350-G, S/N: 10476
FL05	Cleaver Brooks Boiler, 8.165 MMBtu/hr, M/N: CBI 700-200-150, S/N: 0L104650
FL06	Caterpillar Emergency Diesel Fire Pump, M/N: 3406, S/N: 6TB02994, 313 kW, 420 hp
FL07	Caterpillar Emergency Standby Diesel Generator, M/N: 3508, S/N: 23Z02549, 825 kW, 1,106 hp
FL08	Caterpillar Emergency Standby Diesel Generator, M/N: 3508, S/N: 23Z02351, 825 kW, 1,106 hp
FL09	Caterpillar Emergency Standby Diesel Generator, M/N: 3412, S/N: 2WJ02515, 827 kW, 1,109 hp
FL10	Caterpillar Emergency Standby Diesel Generator, M/N: 3412, S/N: 2WJ02570, 827 kW, 1,109 hp
FL11	Caterpillar Emergency Standby Diesel Generator, M/N: 3412, S/N: 81Z08892, 540 kW, 724 hp
FL12	Detroit Diesel Emergency Standby Diesel Generator, M/N: 71237305, S/N: 12VA064532, 415 kW, 556 hp
FL13	Marley Cooling Tower, M/N: NC7042GS, S/N: 057404-001-94, 750 tons, 4,480 gpm (O'Shea's), 3,000 ppm TDS, 0.005% Drift Loss, Cell 1 of 2
FL14	Marley Cooling Tower, M/N: NC7042GS, S/N: 057404-001-94, 750 tons, 4,480 gpm (O'Shea's), 3,000 ppm TDS, 0.005% Drift Loss, Cell 2 of 2

EU	Description
FL15	Marley Cooling Tower, M/N: NC8307K2BS, S/N: 207909-A1, 750 tons, 4,500 gpm (O'Shea's), 3,000 ppm TDS, 0.005% Drift Loss, Cell 1 of 2
FL16	Marley Cooling Tower, M/N: NC8307K2BS, S/N: 207909-A2, 750 tons, 4,500 gpm, (O'Shea's), 3,000 ppm TDS, 0.005% Drift Loss, Cell 2 of 2
FL17	Marley Cooling Tower, M/N: NC7143GS, S/N: 088193-001, 750 tons, 6,900 gpm (Main Plant), 3,000 ppm TDS, 0.005% Drift Loss, Cell 1 of 4
FL18	Marley Cooling Tower, M/N: NC7143GS, S/N: 088194-001-95, 750 tons, 6,900 gpm (Main Plant), 3,000 ppm TDS, 0.005% Drift Loss, Cell 2 of 4
FL19	Marley Cooling Tower, M/N: NC7143GS, S/N: 088194-001-95, 750 tons, 6,900 gpm (Main Plant), 3,000 ppm TDS, 0.005% Drift Loss, Cell 3 of 4
FL20	Marley Cooling Tower, M/N: NC7143GS, S/N: 088194-001-95, 750 tons, 6,900 gpm (Main Plant), 3,000 ppm TDS, 0.005% Drift Loss, Cell 4 of 4
FL21	Marley Cooling Tower, M/N: NC7241GS-98, S/N: 123332-001, (A1), 750 tons, 2,300 gpm (Main Plant), 3,000 ppm TDS, 0.005% Drift Loss, Cell 1 of 2
FL22	Marley Cooling Tower, M/N: NC7042GS-98, S/N: 123332-002, (A2), 750 tons, 2,300 gpm (Main Plant), 3,000 ppm TDS, 0.005% Drift Loss, Cell 2 of 2
FL23	Devilbiss Spray Paint Booth, M/N: XVS-6081
FL24	Murphy-Rogers dust collector for woodworking operations, Model MRM-10-2D, S/N: 1181
FL25	GDO with 500-gallon, ConVault aboveground gasoline storage tank and nozzles

2. Emission Limitations

- a. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-B-2:

Table III-B-2: PTE (tons per rolling 12-months) – Flamingo Las Vegas

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
FL01	14.343 MMBtu/hr	---	0.47	2.22	4.43	0.04	0.34	0.12
FL02	14.645 MMBtu/hr	---	0.48	3.13	2.38	0.04	0.35	0.12
FL03	14.645 MMBtu/hr	---	0.48	3.13	2.38	0.04	0.35	0.12
FL04	14.645 MMBtu/hr	---	0.48	3.13	2.38	0.04	0.35	0.12
FL05	8.165 MMBtu/hr	---	0.27	1.27	1.44	0.02	0.19	0.07
FL06	420 hp, 313 kW	36.0 hr/yr	0.02	0.23	0.06	0.02	0.02	0.01
FL07	1,106 hp, 825 kW	36.0 hr/yr	0.01	0.48	0.11	0.01	0.01	0.01
FL08	1,106 hp, 825 kW	36.0 hr/yr	0.01	0.48	0.11	0.01	0.01	0.01
FL09	1,109 hp, 827 kW	36.0 hr/yr	0.01	0.48	0.11	0.01	0.01	0.01
FL10	1,109 hp, 827 kW	36.0 hr/yr	0.01	0.48	0.11	0.01	0.01	0.01
FL11	724.0 hp, 540 kW	36.0 hr/yr	0.01	0.31	0.07	0.01	0.01	0.01
FL12	556 hp, 415 kW	36.0 hr/yr	0.02	0.31	0.07	0.02	0.03	0.01
FL13	8,400 gal/min	---	1.28	0.00	0.00	0.00	0.00	0.00
FL14		---						
FL15		---						
FL16		---						
FL17	12,000 gal/min	---	1.86	0.00	0.00	0.00	0.00	0.00
FL18		---						
FL19		---						
FL20		---						
FL21		---						
FL22		---						
FL23	7.25 lbs/gal VOC	600 gal/yr	0.00	0.00	0.00	0.00	2.18	1.38
FL24	2,600 cfm	2,080 hr/yr	0.46	0.00	0.00	0.00	0.00	0.00
FL25	500 gal	6,000 gal/year	0.00	0.00	0.00	0.00	0.04	0.01

- b. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-B-3:

Table III-B-3: PTE (pounds per hour) – Flamingo Las Vegas

EU	Rating	NO _x /CO (ppm) ¹	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
FL01	14.343 MMBtu/hr	NO _x 29/CO 95	0.11	0.51	1.01	0.01	0.08	0.03
FL02	14.645 MMBtu/hr	NO _x 30/CO 50	0.11	0.71	0.54	0.01	0.08	0.03
FL03	14.645 MMBtu/hr	NO _x 30/CO 50	0.11	0.71	0.54	0.01	0.08	0.03
FL04	14.645 MMBtu/hr	NO _x 30/CO 50	0.11	0.71	0.54	0.01	0.08	0.03

¹ Corrected to 3 percent oxygen

- c. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

3. Production Limitations

- a. The Permittee shall limit operation of the 420 hp Caterpillar emergency diesel fire pump to 2.0 hour per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: FL06).
- b. The Permittee shall limit operation of each of the two 1,106 hp Caterpillar emergency standby diesel generators to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: FL07 and FL08).
- c. The Permittee shall limit operation of each of the two 1,109 hp Caterpillar emergency standby diesel generators to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: FL09 and FL10).
- d. The Permittee shall limit operation of the 724 hp Caterpillar emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: FL11).
- e. The Permittee shall limit operation of the 556 hp Detroit Diesel emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: FL12).
- f. The Permittee shall limit the cumulative flow rate of the four Marley cooling towers as a group to 8,400 gallons per minute (EUs: FL13 through FL16, inclusive).
- g. The Permittee shall limit the cumulative flow rate of the six Marley cooling towers as a group to 12,000 gallons per minute (EUs: FL17 through FL22, inclusive).
- h. The Permittee shall limit the consumption of VOC and HAP-containing paints, lacquers, thinners, solvents, etc. for surface coating purposes at the Flamingo Las Vegas Hotel and Casino not exceed either 60.0 gallons per month or 600 gallons per rolling 12-months based on a weighted average VOC content of 7.25 pounds per gallon (EU: FL23).
- i. The Permittee shall not allow woodworking operations to exceed 2,080 hours per rolling 12-months (EU: FL24).
- j. The Permittee shall limit maximum amount of throughput of all gasoline products to 500 gallons per month and to 6,000 gallons per rolling 12-months (EU: FL25).

4. Control Requirements

Boilers/Water Heaters

- a. The Permittee shall combust only natural gas in all boilers/heaters.
- b. The Permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's specifications.
- c. The Permittee shall equip the 14.343 MMBtu/hr Johnston boiler with a low-NO_x burner and flue gas recirculation control devices (EU: FL01). The boiler shall emit no more than 29 ppm NO_x and no more than 95 ppm CO (corrected to 3 percent oxygen) during operation.
- d. The Permittee shall equip each of the three 14.645 MMBtu/hr Kewanee boilers with low-NO_x burners (EUs: FL02 through FL04, inclusive). Each boiler shall emit no more than 40 ppm NO_x and no more than 50 ppm CO (corrected to 3 percent oxygen) during operation.
- e. The Permittee shall equip the 8.165 MMBtu/hr Cleaver Brooks boiler shall be equipped with a low-NO_x burner (EU: FL05). The boiler shall emit neither more than 29 ppm NO_x nor more than 55 ppm CO (corrected to 3 percent oxygen) during operation.

Diesel Generators/Fire Pumps

- f. The Permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's specifications. All diesel generators and fire pumps shall combust only low sulfur (<0.05 percent) diesel fuel.
- g. The Permittee shall equip the Caterpillar emergency diesel fire pump with a turbocharger (EU: FL06).
- h. The Permittee shall equip each of the six emergency standby diesel generators with turbochargers (EUs: FL07 through FL12, inclusive).

Cooling Towers

- i. The Permittee shall operate and maintain all cooling towers in accordance with the manufacturer's specifications. No chromium-containing compounds shall be used for water treatment. *[40 CFR 63, Subpart Q]*
- j. The Permittee shall equip each of ten Marley cooling towers with drift eliminators with a manufacturer's maximum drift rate of 0.005 percent (EUs: FL13 through FL22, inclusive).
- k. The Permittee shall maintain the cooling tower circulation water such that the maximum TDS content shall not exceed 3,000 ppm.

Surface Coating

- l. The Permittee shall not operate spray booths unless all exhaust air passes through appropriate filter media having a particulate capture efficiency of at least 99.0 percent. (This is usually accomplished with tacky filter material that is at least 2 inches thick.) The dry filter media must cover all openings in the spray booth.
- m. The Permittee shall not use open containers for storage or disposal of VOC or HAP-containing cloth or paper (excluding masking tape) used for surface preparation and cleanup.
- n. All filters or other control equipment associated with surface coating operations shall follow manufacturer's specifications for use and operation. Dry filters must be changed

at sufficient intervals to prevent a decrease in their effectiveness and prevent them from clogging.

- o. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water), unless the manufacturer's specifications for use indicate a different pressure drop value.
- p. The Permittee shall clean surface coating application equipment in an enclosed container to minimize VOC volatilization into the ambient air.
- q. All containers with VOC and HAP-containing products shall remain securely closed, except during product transfer. Containers shall be inspected regularly for leakage and the contents of any leaking container must be immediately transferred to an appropriately labeled container that has been specifically designed for storage of the compound.
- r. The Permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding, blasting, surface preparation, etc. carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time.

Woodworking

- s. The Permittee shall connect all wood working processes including cutting, sanding, blasting, and surface preparation to a dust collection system (EU: FL24) at all times when such equipment is in operation. [AQR 19.4.1.1]

Gasoline Dispensing

- t. The Permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following [40 CFR 63.11116]:
 - i. minimize gasoline spills;
 - ii. clean up spills as expeditiously as practicable;
 - iii. cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
 - iv. minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators;
 - v. the Permittee shall have records documenting gasoline throughput within 24 hours of a request of the Control Officer; and
 - vi. the Permittee must comply with the requirements of the 40 CFR 63, Subpart CCCCCC by January 10, 2011.
- u. Phase I Vapor Recovery. The following control requirements apply to EU: FL25:
 - i. The ConVault Two Point Stage I Vapor Recovery System shall be constructed in accordance with the "Phase I Vapor Recovery System" drawing, and shall use components specified in the current CARB EO G-70-116 series.
 - ii. The highest point of discharge from a submerged fill-pipe shall be no more than 6.0 inches from the tank bottom.
 - iii. Pursuant to AQR Section 12, all Phase I vapor recovery equipment shall be installed and operated in accordance with the manufacturer's specifications and certification requirements.

- iv. All Phase I vapor recovery equipment shall be maintained to be leak free, vapor tight, and in good working order.
- v. All Phase I vapor recovery equipment shall have a CARB-certified device, which prevents loosening or over tightening of the Phase I product adaptor.
- v. Each system that has a pressure/vacuum vent valve installed must also meet the standards as outlined in the current CARB EO G-70-116 series (EU: FL 25).

Other

- w. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.

5. Monitoring

- a. The Permittee shall install and utilize non-resettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: FL01, FL02, FL03, and FL04). [AQR 19.4.1.3, 40 CFR 60, Subpart Dc]
- b. The Permittee shall monitor operating hours for each applicable diesel engine utilizing non-resettable hour meters when operated for testing, maintenance, or during emergencies. (EUs: FL06, FL07, FL08, FL09, FL10, FL11, and FL12). [AQR 19.4.1.3]
- c. The Permittee shall perform visual emissions checks each calendar quarter on a source-wide level for each emission unit. The quarterly visual checks shall include the boilers, diesel-fired emergency standby generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency standby generators or fire pumps does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3]
- d. The Permittee shall inspect spray paint booth and all ancillary equipment for leaks, malfunctions, proper operation of gauges and pressure drops, each day the booth is operated. A log must be kept of such inspections as well as any corrective actions taken to repair the equipment.
- e. The Permittee shall continue to monitor the TDS in the cooling tower circulating water monthly. The Permittee may use Myron L Ultrameter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 19.4.1.3]
- f. Pursuant to AQR Subsections 12.8.1, the Permittee shall conduct daily inspections for requirements listed in AQR Subsection 52.4 that are associated with the Phase I vapor recovery system to determine if components of the system are defective. [AQR 12.8]

6. Testing

Burner Efficiency Tests

- a. The Permittee operating a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr but less than 10.0 MMBtu/hr shall perform a burner efficiency test at least once each calendar year. Burner efficiency tests shall be conducted in accordance with the manufacturer's specifications and specifications for good combustion practices (EU: FL05). [AQR 19.4.1.3]

- b. The Permittee operating a boiler with a maximum heat input rating of 10.0 MMBtu/hr or greater shall perform burner efficiency tests at least twice each year. The tests shall be performed at least five (5) months but no more than seven (7) months apart during each calendar year (EUs: FL01). If the boiler has a permitted hourly limit of less than 2,000 hours per year, then a burner efficiency test may be performed at least once each calendar year. Currently no emission units with a heat input rating of 10.0 MMBtu/hr or greater have been proposed to operate for less than 2,000 hours per year. [AQR 19.4.1.3]
- c. If the documented actual hours of operation of a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr are zero (0) during a calendar year, the Permittee may choose not to perform a burner efficiency test on that boiler during that calendar year. To document that the actual hours of operation for that boiler are zero (0) during a calendar year, the Permittee shall install an hour meter prior to the beginning of that calendar year and maintain written records to verify the actual hours of operation during that calendar year. [AQR 19.4.1.3]
- d. If the documented actual hours of operation of a boiler with a maximum heat input rating equal to or greater than 10.0 MMBtu/hr are less than 50 hours during a calendar year, the Permittee may perform a burner efficiency test on that boiler only once during that calendar year. To document that the actual hours of operation for that boiler are less than 50 hours during a calendar year, the Permittee shall install an hour meter prior to the beginning of that calendar year and maintain written records to verify the actual hours of operation during that calendar year. [AQR 19.4.1.3]
- e. A performance test conducted in accordance with AQR Subsection 49.4 may replace a required burner efficiency test as approved by the Control Officer. [AQR 19.4.1.3]

Performance Tests

- f. Performance testing is subject to the requirements of 40 CFR 60 (as amended), and AQR Section 49. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: FL01, FL02, FL03, and FL04). [AQR 19.4.1.3]
- g. Subsequent performance testing shall be conducted at a frequency of no later than once every 5 years from the previous performance test on that boiler. Subsequent performance testing shall be conducted on emission units FL01, FL02, FL03, and FL04. [AQR 19.4.1.3]

Table III-B-4: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NOx	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Boiler Exhaust Outlet Stack	PM ₁₀	EPA Method 9
Stack Gas Parameters	-	EPA Methods 1, 2, 3A, and 4

Note: 40 CFR Part 60, Subpart Dc and AQR Section 49 are applicable to this facility.

- h. The following general performance testing requirements of the Phase I apply to the EU: FL25 [AQR 19.4.1.3]:
 - i. Each performance tests shall be conducted in accordance with the applicable CARB Test Procedure that is required by the CARB EO.
 - ii. The source shall give a 7-day written prior notice of the date of the test to the Control Officer.

- iii. Any prior approved scheduled performance test cannot be canceled and/or rescheduled except with the prior approval of the Control Officer.
 - iv. Within 60 days from the end of an initial or annual performance test, source shall submit a report containing the results of such test to the Control Officer.
 - v. The report shall have, as the first page of text, a signed Certification of Performance Test Results (see Attached).
 - vi. Each performance test shall be conducted by a DAQEM approved Certified Phase II Vapor Recovery Tester, as defined in AQR Subsection 52.2.
 - vii. If any performance test fails, then the affected portion of the GDO will be tagged "Out of Order" until corrective action has been taken and the retest passed.
 - viii. If the source fails a performance test, DAQEM shall be notified within 24 hours or by 12:00 p.m. (Noon) of DAQEM's next business day, whichever is soonest. Repairs to correct the defects shall be made and a retest scheduled with DAQEM. The retest shall be scheduled within 10 calendar days of the failed test. If the repairs and retest cannot be accomplished within 10 calendar days, the source must submit the reasons and a proposed date for retesting in writing to DAQEM for approval.
- i. The source shall conduct performance tests listed in Table III-B-5:

Table III-B-5: Required Performance Test Criterion: Balance System

Description	CARB Test Procedure	Standard
Pressure decay/leak: vapor control system including nozzles and underground tanks	TP-201.3	Initial: 2" wc Final: Referenced Value
Dynamic Back Pressure	TP-201.4	0.5" wc @ 60 SCFH, N ₂ ²
A/L Test ¹	TP-201.5	See Table III-B-1
Dispensing nozzle flow rate ¹	As Specified in EO G-70-17 series	10 gpm (max.)

¹A/L minimum and maximum results by system type U.S. EPA Federal Register, Volume 58, Number 55, Page 16019.

²If the source fails the Dynamic Back Pressure performance test, the source shall be required to comply with additional performance testing requirements in accordance with the applicable EO for this equipment.

Initial Performance Test [AQR 19.4.1.3]:

- i. The source shall conduct and pass an initial performance test within 30 days of the source commencing operations.
 - ii. The source shall conduct and pass an initial performance test within 30 days of commencing operations of new emission units that require performance testing.
 - iii. The source shall conduct and pass an initial performance test within 30 days of commencing operations of modified emission units that require performance testing.
 - iv. The initial performance test must be witnessed by an inspector from the DAQEM.
- j. Testing of diesel emergency standby generators shall not take place during CO advisories. It is the Permittee's responsibility to satisfy all federal requirements to which this facility is subject.

7. Recordkeeping

- a. The Permittee shall maintain records on site that include, at minimum, the following information [AQR 19.4.1.3(b)]:
 - i. daily amount of natural gas consumed (in MMBtu, scf or therms) for each boiler (EUs: FL01, FL02, FL03, and FL04) [40 CFR 60, Subpart Dc];

- ii. daily hour meter readings of each diesel emergency standby generator when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: FL07, FL08, FL09, FL10, FL11, and FL12);
 - iii. daily hour meter readings of each diesel fire pump when operated for testing and maintenance purposes, and separately for use during emergencies (EU: FL06);
 - iv. a log of hour and fuel meter resets if a programmable meter is used;
 - v. sulfur content of diesel fuel certified by the supplier;
 - vi. MSDS or records demonstrating the VOC and HAP content for each compound used for surface coating activities;
 - vii. monthly hours of operation of each cooling tower (EUs:FL13, FL14, FL15, FL16, FL17, FL18, FL19, FL20, FL21, and FL22);
 - viii. monthly TDS content of cooling tower circulation water;
 - ix. a log book of all inspections, maintenance, and repairs as specified in this document;
 - x. records of burner efficiency testing as specified in this Operating Permit;
 - xi. results of performance testing; and
 - xii. GDO records shall contain, at minimum, the following information (EU: FL25) [AQR 19.4.1.3]:
 - (i) a record of any maintenance on any part of the Phase I equipment, including a general description of the maintenance;
 - (ii) the date and time the equipment was taken out-of-service;
 - (iii) the date of repair or replacement;
 - (iv) a general description of the part location (e.g., pump, tank, nozzle number, etc.);
 - (v) a description of the problem; and
 - (vi) the results of the daily inspections.
- b. The Permittee shall maintain on site and report the following information semi-annually [AQR 19.4.1.3(b)]:
- i. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each diesel generator and fire pump (EUs: FL07, FL08, FL09, FL10, FL11, FL12 and FL06);
 - ii. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to surface coating activities (paints, basecoats, primers, reducers, thinners, solvents, etc.);
 - iii. monthly and 12-month rolling total of gasoline throughput [40 CFR 63.11116(b)]; and
 - iv. monthly and rolling 12-month total hours of woodworking operations (EU: FL24);
- c. For all Inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 19.4.1.3]

C. BALLY'S LAS VEGAS

1. Emission Units

Table III-C-1: Summary of EU – Bally's Las Vegas

EU	Description
BA01	Kewanee Boiler, 16.8 MMBtu/hr, M/N: H3S-750-G02, S/N: NB-24935
BA02	Kewanee Boiler, 16.8 MMBtu/hr, M/N: H3S-750-G02, S/N: NB-25232
BA03	Kewanee Boiler, 31.383 MMBtu/hr, M/N: H3S-750-G02, S/N: NB-24875
BA04	Detroit Diesel Emergency Standby Diesel Generator, M/N: 9163-7305, S/N: 16E0006591 (#1), 1,000 kW, 1,340 hp
BA05	Detroit Diesel Emergency Standby Diesel Generator, M/N: 9163-7305, S/N: 16E01006592 (#2), 1,000 kW, 1,340 hp
BA06	Detroit Diesel Emergency Standby Diesel Generator, M/N: 7163-7305, S/N: 16VA7496, 500 kW, 670 hp
BA07	Detroit Diesel Emergency Standby Diesel Generator, S/N: LD-94032, 150 kW, 200 hp
BA08	Cummins Emergency Diesel Fire Pump, M/N: NT855-F2, S/N: 10923797, 285 hp; Fire Pump # 1
BA09	Cummins Emergency Diesel Fire Pump, M/N: NT855-F2, S/N: 10923795, 285 hp; Fire Pump # 2
BA10	Cummins Emergency Diesel Fire Pump, M/N: NT855-F, S/N: 10949266, 179 hp; Fire Pump # 3
BA11	Detroit Diesel Emergency Standby Diesel Generator, M/N: 1000 DS, S/N: 600214, (#3) 1,000 kW, 1,340 hp
BA12	Detroit Diesel Emergency Standby Diesel Generator, M/N: 1000 DS, S/N: 600215, (#4) 1,000 kW, 1,340 hp
BA13	Spray King Paint Booth, M/N: 200 FAFC, S/N: N/A, 14'x20'x10'
BA14	Baltimore Aircoil Cooling Tower, M/N: IMT-1700-3, S/N: IS6062, 20,400 gpm, 3,000 ppm TDS, 0.005% drift loss
BA15	Baltimore Aircoil Cooling Tower, M/N: FI-743-L, S/N: 96200451, 130 gpm, 3,000 ppm TDS, 0.001% drift loss
BA16	Econoline Syphon Blast Cabinet, Model 36-1, with a Dayton Model 2Z982H dust collection system

2. Emission Limitations

- a. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-C-2:

Table III-C-2: PTE (tons per rolling 12-months) – Bally's Las Vegas

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
BA01 ¹	16.8 MMBtu/hr	10,900 hr/yr	0.69	2.79	1.57	0.05	0.49	0.17
BA02 ¹	16.8 MMBtu/hr							
BA03	31.383 MMBtu/hr	2,920 hr/yr	0.34	1.40	0.78	0.03	0.25	0.09
BA04	1,340 hp, 1000 kW	36.0 hr/yr	0.02	0.58	0.13	0.01	0.02	0.01
BA05	1,340 hp, 1000 kW	36.0 hr/yr	0.02	0.58	0.13	0.01	0.02	0.01
BA06	670 hp, 500 kW	36.0 hr/yr	0.01	0.29	0.07	0.01	0.01	0.01
BA07	200 hp, 155 kW	36.0 hr/yr	0.01	0.11	0.02	0.01	0.01	0.01
BA08	285 hp, 212 kW	36.0 hr/yr	0.01	0.16	0.03	0.01	0.01	0.01
BA09	285 hp, 212 kW	36.0 hr/yr	0.01	0.16	0.03	0.01	0.01	0.01
BA10	179 hp, 134 kW	36.0 hr/yr	0.01	0.10	0.02	0.01	0.01	0.01
BA11	1,340 hp, 1000 kW	36.0 hr/yr	0.02	0.58	0.13	0.01	0.02	0.01
BA12	1,340 hp, 1000 kW	36.0 hr/yr	0.02	0.58	0.13	0.01	0.02	0.01
BA13	7.25 lbs/gal VOC	600 gal/yr	0.00	0.00	0.00	0.00	2.18	1.38
BA14	20,400 gal/min	---	3.26	0.00	0.00	0.00	0.00	0.00
BA15	130.0 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
BA16	422.2 lbs/hr	2,080 hr/yr	0.30	0.00	0.00	0.00	0.00	0.00

¹Emissions and operation of two Kewanee boilers (BA01 and BA02) have combined limitations as indicated in this Table.

- b. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-C-3:

Table III-C-3: PTE (pounds per hour) – Bally's Las Vegas

EU	Rating	NO _x /CO (ppm) ¹	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
BA01	16.8 MMBtu/hr	NO _x 25/CO 23	0.13	0.51	0.29	0.01	0.09	0.03
BA02	16.8 MMBtu/hr	NO _x 25/CO 23	0.13	0.51	0.29	0.01	0.09	0.03
BA03	31.383 MMBtu/hr	NO _x 25/CO 23	0.24	0.96	0.54	0.02	0.17	0.06

¹ Corrected to 3 percent oxygen

- c. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

3. Production Limitations

- a. The Permittee shall limit operation of the two 16.8 MMBtu/hr Kewanee boilers to 10,900 hours combined per rolling 12-months (EUs: BA01 and BA02).
- b. The Permittee shall limit operation of the 31.383 MMBtu/hr Kewanee boiler to 2,920 hours per rolling 12-months (EU: BA03).
- c. The Permittee shall limit operation of each of the two 1,340 hp Detroit Diesel emergency standby diesel generators to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: BA04 and BA05).
- d. The Permittee shall limit operation of the 670 hp Detroit Diesel emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: BA06).
- e. The Permittee shall limit operation of the 200 hp Detroit Diesel emergency standby diesel generator to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: BA07).
- f. The Permittee shall limit operation of each of the two 285 hp Cummins emergency diesel fire pumps to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: BA08 and BA09).
- g. The Permittee shall limit operation of the 179 hp Cummins emergency diesel fire pump to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: BA10).
- h. The Permittee shall limit operation of each of the two 1,340 hp Detroit Diesel emergency standby diesel generators to 2.0 hours per day and 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: BA11 and BA12).
- i. The Permittee shall limit the consumption of VOC- and HAP-containing paints, lacquers, thinners, solvents, etc. for surface coating purposes at the Bally's Las Vegas Hotel and

Casino not exceed either 60.0 gallons per month or 600 gallons per rolling 12-months based on a weighted average VOC content of 7.25 pounds per gallon (EU: BA13).

- j. The Permittee shall limit the operation of the Econoline Syphon Blast Cabinet to 2,080 hours per rolling 12-months (EU: BA16).

4. Control Requirements

Boilers/Water Heaters

- a. The Permittee shall combust only natural gas in all boilers/heaters.
- b. The Permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's specifications.
- c. The Permittee shall equip each of the two 16.8 MMBtu/hr Kewanee boilers with low-NO_x burners and flue gas recirculation control devices (EUs: BA01 and BA02). Each boiler shall emit no more than 25 ppm NO_x and no more than 23 ppm CO (corrected to 3 percent oxygen) during operation.
- d. The Permittee shall equip the 31.383 MMBtu/hr Kewanee boiler with low-NO_x burner (EU: BA03). The boiler shall emit no more than 25 ppm NO_x and no more than 23 ppm CO (corrected to 3 percent oxygen) during operation.

Diesel Generators

- e. The Permittee shall operate and maintain all diesel generators in accordance with the manufacturer's specifications. All diesel generators and fire pumps shall combust only low sulfur (<0.05 percent) diesel fuel.
- f. The Permittee shall equip each of the nine emergency standby diesel generators with turbochargers (EU: BA04 through BA12, inclusive).

Cooling Towers

- g. The Permittee shall operate and maintain all cooling towers in accordance with the manufacturer's specifications. No chromium-containing compounds shall be used for water treatment. [40 CFR 63, Subpart Q]
- h. The Permittee shall equip the Baltimore Aircoil cooling tower with drift eliminators with a manufacturer's maximum drift rate of 0.005 percent (EU: BA14).
- i. The Permittee shall equip the Baltimore Aircoil cooling tower with drift eliminators with a manufacturer's maximum drift rate of 0.001 percent (EU: BA15).
- j. The Permittee shall maintain the cooling water such that the maximum TDS content shall not exceed 3,000 ppm (EUs: BA14 and BA15).

Surface Coating

- k. The Permittee shall not operate spray booths unless all exhaust air passes through appropriate filter media having a particulate capture efficiency of at least 99.0 percent. (This is usually accomplished with tacky filter material that is at least 2 inches thick.) The dry filter media must cover all openings in the spray booth.
- l. The Permittee shall not use open containers for storage or disposal of VOC or HAP-containing cloth or paper (excluding masking tape) used for surface preparation and cleanup.
- m. All filters or other control equipment associated with surface coating operations shall follow manufacturer's specifications for use and operation. Dry filters must be changed

at sufficient intervals to prevent a decrease in their effectiveness and prevent them from clogging.

- n. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water), unless the manufacturer's specifications for use indicate a different pressure drop value.
- o. The Permittee shall clean surface coating application equipment in an enclosed container to minimize VOC volatilization into the ambient air.
- p. All containers with VOC and HAP-containing products shall remain securely closed, except during product transfer. Containers shall be inspected regularly for leakage and the contents of any leaking container must be immediately transferred to an appropriately labeled container that has been specifically designed for storage of the compound.
- q. The Permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding, blasting, surface preparation, etc. carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time.

Sandblasting

- r. The Permittee shall connect all sandblasting processes including blasting and surface preparation to a dust collection system (EU: BA16) at all times when such equipment is in operation. [AQR 19.4.1.1]

Other

- s. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.

5. Monitoring

- a. The Permittee shall install and utilize non-resettable hour meters such that the actual operating hours can be established for each applicable boiler (EUs: BA01, BA02, and BA03). [AQR 19.4.1.3]
- b. The Permittee shall install and utilize non-resettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: BA01, BA02, and BA03). [AQR 19.4.1.3, 40 CFR 60, Subpart Dc]
- c. The Permittee shall install and utilize non-resettable hour meters such that the daily operating hours can be established for each applicable engine (EUs: BA04, BA05, BA06, BA07, BA08, BA09, BA10, BA11, and BA12). [AQR 19.4.1.3]
- d. The Permittee shall perform visual emissions checks each calendar quarter on a source-wide level for each emission unit. The quarterly visual checks shall include the boilers, diesel-fired emergency standby generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency standby generators or fire pumps does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3]
- e. The Permittee shall inspect spray paint booth and all ancillary equipment for leaks, malfunctions, proper operation of gauges and pressure drops, each day the booth is

operated. A log must be kept of such inspections as well as any corrective actions taken to repair the equipment.

- f. The Permittee shall monitor the TDS in the cooling tower circulating water monthly. The Permittee may use Myron L Ultrameter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 19.4.1.3]

6. Testing

Performance Tests

- a. Performance testing is subject to the requirements of 40 CFR 60 (as amended), and AQR Section 49. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr. (EUs: BA01, BA02, and BA03) [AQR 19.4.1.3]
- b. Subsequent performance testing shall be conducted at a frequency of no later than once every 5 years from the previous performance test on that boiler. Subsequent performance testing shall be conducted on EUs: BA01, BA02, and BA03. [AQR 19.4.1.3]

Table III-C-4: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NOx	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Boiler Exhaust Outlet Stack	PM ₁₀	EPA Method 9
Stack Gas Parameters	-	EPA Methods 1, 2, 3A, and 4

Note: 40 CFR Part 60, Subpart Dc and AQR Section 49 are applicable to this facility.

- c. Testing of diesel emergency standby generators shall not take place during CO advisories. It is the Permittee's responsibility to satisfy all federal requirements to which this facility is subject.

7. Recordkeeping

- a. The Permittee shall maintain records on site that include, at minimum, the following information [AQR 19.4.1.3(b)]:
 - i. daily amount of natural gas consumed (in MMBtu, scf or therms) for each boiler (EUs: BA01, BA02 and BA03); [40 CFR 60, Subpart Dc]
 - ii. daily hour meter readings of each diesel emergency standby generator when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: BA04, BA05, BA06, BA07, BA11, and BA12);
 - iii. daily hour meter readings of each diesel fire pump when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: BA08, BA09, and BA10);
 - iv. a log of hour and fuel meter resets if a programmable meter is used;
 - v. sulfur content of diesel fuel certified by the supplier;
 - vi. records of the total monthly consumption (in gallons) of each VOC-containing compound related to surface coating activities (paints, basecoats, primers, reducers, thinners, solvents, etc.);
 - vii. MSDS or records demonstrating the VOC and HAP content for each compound used for surface coating activities;

- viii. monthly hours of operation of each cooling tower (EUs: BA14 and BA15);
 - ix. monthly TDS content of cooling tower circulation water;
 - x. a log book of all inspections, maintenance, and repairs as specified in this document;
 - xi. results of performance testing.
- b. The Permittee shall maintain on site and report the following information semi-annually [AQR 19.4.1.3(b)]:
- i. monthly total of operating hours to demonstrate compliance with the 12-month rolling hour limits for each boiler/water heater (EUs: BA01, BA02 and BA03);
 - ii. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each diesel generator and fire pump (EUs: BA04, BA05, BA06, BA07, BA11, BA12, BA08, BA09, and BA10);
 - iii. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to surface coating activities (paints, basecoats, primers, reducers, thinners, solvents, etc.); and
 - iv. monthly and rolling 12-month total hours of sandblasting operations (EU: BA16).
- c. For all Inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 19.4.1.3]
- d. Records and data required by this Operating Permit to be maintained by the Permittee may, at the Permittee's expense, be audited at any time by a third party selected by the Control Officer. This third party shall be subject to the same business confidentiality terms binding DAQEM during investigations and data gathering. [AQR 19.4.1.3]
- e. All records and logs, or a copy thereof, shall be kept on-site for a minimum of five (5) years from the date the measurement was taken or data was entered and shall be made available to DAQEM upon request. [AQR 19.4.1.3(b)]
- f. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. [AQR 19.4.1.3(b)]

D. BILL'S GAMBLIN' HALL & SALOON

1. Emission Units

Table III-D-1: Summary of EU – Bill's Gamblin' Hall & Saloon

EU	Description
BH01	Detroit Diesel Emergency Standby Generator, M/N: 70837305, S/N: 8VA397721, 369 hp, 275 kW
BH02	Detroit Diesel Emergency Standby Generator, M/N: 70837305, S/N: 8VA370148, 336 hp, 250 kW
BH03	Ajax Natural Gas Boiler, M/N: WGOFD-4250, S/N: 80-33079, 4.25 MMBtu/hr
BH04	Ajax Natural Gas Boiler, M/N: WGOFD-2500, S/N: 78-31124, 2.50 MMBtu/hr
BH05	Marley Cooling Tower, M/N: NC5201GS-99, S/N: 143430-001, 3,000 ppm TDS, 1,209 gpm, 0.005% drift
BH07	Baltimore Aircoil Cooling Tower, M/N: 3240A, S/N: U052297001 , 3,000 ppm TDS, 660 gpm, 0.005% drift

2. Emission Limitations

- a. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-D-2 :

Table III-D-2: PTE (tons per rolling 12-months) – Bill’s Gamblin’ Hall & Saloon

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
BH01	369 hp	52.0 hr/yr	0.02	0.30	0.06	0.02	0.02	0.01
BH02	336 hp	52.0 hr/yr	0.02	0.27	0.06	0.02	0.02	0.01
BH03	4.25 MMBtu/hr	---	0.14	1.82	1.53	0.01	0.10	0.04
BH04	2.50 MMBtu/hr	---	0.08	1.07	0.90	0.01	0.06	0.02
BH05	1,209 gal/min	---	0.19	0.00	0.00	0.00	0.00	0.00
BH07	660 gal/min	---	0.10	0.00	0.00	0.00	0.00	0.00

- b. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

3. Production Limitations

- a. The Permittee shall limit operation of each of the two diesel emergency standby generators to 52.0 hours per rolling 12-months for testing and maintenance purposes. These limits do not apply during emergencies (EU: BH01 and BH02).

4. Control Requirements

Boilers/Water Heaters

- a. The Permittee shall combust only natural gas in all boilers/heaters.
- b. The Permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer’s specifications.
- c. The Permittee shall limit emissions from each of the 4.3 MMBtu/hr and 2.5 MMBtu/hr Ajax boilers to 80 ppm NO_x and 111 ppm CO (corrected to 3 percent oxygen) (EUs: BH03 and BH04).

Diesel Generators

- d. The Permittee shall operate and maintain all diesel generators in accordance with the manufacturer’s specifications. All diesel generators and fire pumps shall combust only low sulfur (<0.05 percent) diesel fuel.
- e. The Permittee shall equip each of the two Detroit Diesel emergency standby diesel generators with turbochargers (EUs: BH01 and BH02).

Cooling Towers

- f. The Permittee shall operate and maintain all cooling towers in accordance with the manufacturer’s specifications. No chromium-containing compounds shall be used for water treatment. [40 CFR 63, Subpart Q]
- g. The Permittee shall equip each of the two cooling towers with drift eliminators with a manufacturer’s maximum drift rate of 0.005 percent (EUs: BH05 and BH07).
- h. The Permittee shall maintain the cooling water such that the maximum TDS content shall not exceed 3,000 ppm (EUs: BH05 and BH07).

Other

- i. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.

5. Monitoring

- a. The Permittee shall monitor operating hours for each applicable diesel engine utilizing non-resettable hour meters when operated for testing, maintenance, or during emergencies. (EUs: BH01 and BH02). [AQR 19.4.1.3]
- b. The Permittee shall perform visual emissions checks each calendar quarter on a source-wide level for each emission unit. The quarterly visual checks shall include the boilers, diesel-fired emergency standby generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency standby generators or fire pumps does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3]
- c. The Permittee shall monitor the TDS in the cooling tower circulating water monthly. The Permittee may use Myron L Ultrameter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 19.4.1.3]

6. Testing

Burner Efficiency Tests

- a. The Permittee operating a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr but less than 10.0 MMBtu/hr shall perform a burner efficiency test at least once each calendar year. Burner efficiency tests shall be conducted in accordance with the manufacturer's specifications and specifications for good combustion practices (EU: BH03). [AQR 19.4.1.3]
- b. If the documented actual hours of operation of a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr are zero (0) during a calendar year, the Permittee may choose not to perform a burner efficiency test on that boiler during that calendar year. To document that the actual hours of operation for that boiler are zero (0) during a calendar year, the Permittee shall install an hour meter prior to the beginning of that calendar year and maintain written records to verify the actual hours of operation during that calendar year. [AQR 19.4.1.3]
- c. A performance test conducted in accordance with AQR Subsection 49.4 may replace a required burner efficiency test as approved by the Control Officer. [AQR 19.4.1.3]

Performance Tests

- d. Testing of diesel emergency standby generators shall not take place during CO advisories. It is the Permittee's responsibility to satisfy all federal requirements to which this facility is subject.

7. Recordkeeping

- a. The Permittee shall maintain records on site that include, at minimum, the following information [AQR 19.4.1.3(b)]:

- i. daily hour meter readings of each diesel emergency standby generator when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: BH01 and BH02);
 - ii. a log of hour and fuel meter resets if a programmable meter is used;
 - iii. sulfur content of diesel fuel certified by the supplier;
 - iv. monthly hours of operation of each cooling tower (EUs: BH05 and BH06);
 - v. monthly TDS content of cooling tower circulation water;
 - vi. a log book of all inspections, maintenance, and repairs as specified in this document; and
 - vii. records of burner efficiency tests.
- b. The Permittee shall maintain on site and report the following information semi-annually [AQR 19.4.1.3(b)]:
- i. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each diesel generator (EUs: BH01 and BH02);
- c. For all inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 19.4.1.3]

E. CAESAR'S PALACE

1. Emission Units

Table III-E-1: Summary of EU – Caesar's Palace

EU	Description
CP01	Hurst Boiler, 35.40 MMBtu/hr, M/N: NA, S/N: S4000-150-18
CP02	Hurst Boiler, 35.40 MMBtu/hr, M/N: NA, S/N: S4000-150-19
CP03	Burnham Boiler, 33.475 MMBtu/hr, M/N: 3P80050GBNM, S/N: 12524
CP04	Burnham Boiler, 33.475 MMBtu/hr, M/N: 3P80050GBNM, S/N: 12164
CP05	Burnham Boiler, 33.475 MMBtu/hr, M/N: 3P80050GBNM, S/N: 12238
CP06	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.01
CP07	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.02
CP08	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.03
CP10	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.05
CP13	Caterpillar Emergency Standby Diesel Generator, M/N: 3516B, S/N: 6HN00155, 2,145 kW, 2,876 hp
CP14	Caterpillar Emergency Standby Diesel Generator, M/N: 3516B, S/N: 6HN00154, 2,145 kW, 2,876 hp
CP15	Caterpillar Emergency Standby Diesel Generator, M/N: 3516, S/N: 25Z05223, 1,879 kW, 2,520 hp
CP16	Caterpillar Emergency Standby Diesel Generator, M/N: 3512, S/N: 24Z06413, 1,356 kW, 1,818 hp
CP17	Caterpillar Emergency Standby Diesel Generator, M/N: 3516B, S/N: 6HN00199, 2,145 kW, 2,876 hp
CP18	Caterpillar Emergency Diesel Fire Pump, M/N: 3406B, S/N: 6TB04881, 321 kW, 430 hp
CP19a	Baltimore Aircoil Cooling Tower, M/N: 4469-20-3W, S/N: 92-4G-6184-P4, 3-Cell, 27,000 gpm (9,000 gpm per cell), 3,000 ppm TDS, 0.005% Drift Loss; Cell 1
CP19b	Baltimore Aircoil Cooling Tower, M/N: 4469-20-3W, S/N: 92-4G-6184-P4, 3-Cell, 27,000 gpm (9,000 gpm per cell), 3,000 ppm TDS, 0.005% Drift Loss; Cell 2

EU	Description
CP19c	Baltimore Aircoil Cooling Tower, M/N: 4469-20-3W, S/N: 92-4G-6184-P4, 3-Cell, 27,000 gpm (9,000 gpm per cell), 3,000 ppm TDS, 0.005% Drift Loss; Cell 3
CP20	Baltimore Aircoil Cooling Tower, M/N: 3725A3, S/N:U040665201MAD, 5,750 gpm, 2,700 ppm TDS, 0.005% Drift Loss
CP21	Baltimore Aircoil Cooling Tower, M/N: 3725A3, S/N:U040665202MAD, 5,750 gpm, 2,700 ppm TDS, 0.005% Drift Loss
CP22	Baltimore Aircoil Cooling Tower, M/N: 3725A3, S/N:U040665203MAD, 5,750 gpm, 2,700 ppm TDS, 0.005% Drift Loss
CP23	Spray King Spray Paint Booth (24.0' x 14' x 8'), M/N: 200-P, S/N: N/A
CP24	RBI Futera Boiler, 1.5 MMBtu/hr, M/N: FW1500N0, S/N: 120644885
CP25	RBI Futera Boiler, 1.5 MMBtu/hr, M/N: FW1500N0, S/N: 120644886
CP26	Unilux Boiler, 24.0 MMBtu/hr, M/N: ZF2500W-1-300/400, S/N: A1683
CP27	Unilux Boiler, 24.0 MMBtu/hr, M/N: ZF2500W-1-300/400, S/N: A1684
CP28	Caterpillar Emergency Standby Diesel Generator, M/N: 3516CDITA, S/N: SBJ00672, 2,710 kW, 3,634 hp
CP29	Caterpillar Emergency Standby Diesel Generator, M/N: 3516CDITA, S/N: SBJ00673, 2,710 kW, 3,634 hp
CP30a	Composite Cooling Solutions Cooling Tower, M/N: FT-2828-75-P6IL, S/N: CT-7, 5,600 gpm, 2,700 ppm TDS, 0.0015% Drift Loss
CP30b	Composite Cooling Solutions Cooling Tower, M/N: FT-2828-75-P6IL, S/N: CT-8, 5,600 gpm, 2,700 ppm TDS, 0.0015% Drift Loss
CP32	GDO with a 1,000-gallon, Fireguard aboveground gasoline storage tank and nozzles
CP33	Pollution International Dust Collector, 10 hp, M/N: 33N375
CP34	Clarke Diesel Fire Pump, 525 hp (392 kW), M/N: JX6H-UF60, S/N: RG6125H06331
CP35	Clarke Diesel Fire Pump, 525 hp (392 kW), M/N: JX6H-UF60, S/N: RG6125H06339

2. Emission Limitations

- a. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-E-2:

Table III-E-2: PTE (tons per rolling 12-months) – Caesar's Palace

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
CP01 ¹	35.40 MMBtu/hr	Combined rolling 12-months cap 33,520 hr/yr	4.34	20.65	4.27	0.35	3.12	1.10
CP02 ¹	35.40 MMBtu/hr							
CP03 ¹	33.475 MMBtu/hr							
CP04 ¹	33.475 MMBtu/hr							
CP05 ¹	33.475 MMBtu/hr							
CP06	1.0 MMBtu/hr	---	0.03	0.07	0.25	0.01	0.02	0.01
CP07	1.0 MMBtu/hr	---	0.03	0.07	0.25	0.01	0.02	0.01
CP08	1.0 MMBtu/hr	---	0.03	0.07	0.25	0.01	0.02	0.01
CP10	1.0 MMBtu/hr	---	0.03	0.07	0.25	0.01	0.02	0.01
CP13	2,876 hp, 2,145 kW	36.0 hr/yr	0.04	1.24	0.28	0.02	0.04	0.02
CP14	2,876 hp, 2,145 kW	36.0 hr/yr	0.04	1.24	0.28	0.02	0.04	0.02
CP15	2,520 hp, 1,879 kW	36.0 hr/yr	0.03	1.09	0.25	0.02	0.03	0.01
CP16	1,818 hp, 1,356 kW	36.0 hr/yr	0.02	0.79	0.18	0.01	0.02	0.01
CP17	2,876 hp, 2,145 kW	36.0 hr/yr	0.04	1.24	0.28	0.02	0.04	0.02
CP18	430 hp, 321 kW	36.0 hr/yr	0.02	0.24	0.05	0.02	0.02	0.01
CP19 a	9,000 gal/min	---	1.39	0.00	0.00	0.00	0.00	0.00
CP19 b	9,000 gal/min	---	1.39	0.00	0.00	0.00	0.00	0.00

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
CP19c	9,000 gal/min	---	1.39	0.00	0.00	0.00	0.00	0.00
CP20	5,750 gal/min	---	0.80	0.00	0.00	0.00	0.00	0.00
CP21	5,750 gal/min	---	0.80	0.00	0.00	0.00	0.00	0.00
CP22	5,750 gal/min	---	0.80	0.00	0.00	0.00	0.00	0.00
CP23	7.25 lbs/gal VOC	700 gal/yr	0.00	0.00	0.00	0.00	2.54	1.61
CP24	1.50 MMBtu/hr	---	0.05	0.08	0.24	0.01	0.04	0.01
CP25	1.50 MMBtu/hr	---	0.05	0.08	0.24	0.01	0.04	0.01
CP26	24.0 MMBtu/hr	---	0.79	1.16	3.90	0.06	0.57	0.20
CP27	24.0 MMBtu/hr	---	0.79	1.16	3.90	0.06	0.57	0.20
CP28	3,634 hp, 2,710 kW	52.0 hr/yr	0.01	1.35	0.11	0.04	0.04	0.02
CP29	3,634 hp, 2,710 kW	52.0 hr/yr	0.01	1.35	0.11	0.04	0.04	0.02
CP30 a	5,600 gal/min	---	0.23	0.00	0.00	0.00	0.00	0.00
CP30 b	5,600 gal/min	---	0.23	0.00	0.00	0.00	0.00	0.00
CP32	1,000 gal	18,000 gal/yr	0.00	0.00	0.00	0.00	0.03	0.01
CP33	3,000 cfm	2,080 hr/yr	0.53	0.00	0.00	0.00	0.00	0.00
CP34	525 hp, 392 kW	52 hr/yr	0.01	0.14	0.01	0.03	0.01	0.01
CP35	525 hp, 392 kW	52 hr/yr	0.01	0.14	0.01	0.03	0.01	0.01

¹Emissions and operation of the two Hurst (CP01 and CP02) and the three Burnham (CP03, CP04, and CP05) boilers have combined limitations as indicated in this Table. The cumulative PTE was calculated based on the worse-case operating scenario: 17,520 hours per rolling 12-months operating 35.4 MMBtu/hr boilers and 16,000 hours per rolling 12-months operating 33.475 MMBtu/hr boilers.

- b. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-E-3:

Table III-E-3: PTE (pounds per hour) – Caesar’s Palace

EU	Rating	NO _x /CO (ppm) ¹	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
CP01	35.4 MMBtu/hr	NO _x 29/CO 10	0.27	1.24	0.26	0.02	0.19	0.07
CP02	35.4 MMBtu/hr	NO _x 29/CO 10	0.27	1.24	0.26	0.02	0.19	0.07
CP03	33.475 MMBtu/hr	NO _x 30/CO 10	0.25	1.23	0.25	0.02	0.18	0.06
CP04	33.475 MMBtu/hr	NO _x 30/CO 10	0.25	1.23	0.25	0.02	0.18	0.06
CP05	33.475 MMBtu/hr	NO _x 30/CO 10	0.25	1.23	0.25	0.02	0.18	0.06
CP26	24.0 MMBtu/hr	NO _x 9/CO 50	0.18	0.26	0.89	0.01	0.13	0.05
CP27	24.0 MMBtu/hr	NO _x 9/CO 50	0.18	0.26	0.89	0.01	0.13	0.05

¹ Corrected to 3 percent oxygen

- c. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

3. Production Limitations

- a. The Permittee shall limit operation of each of the two 35.4 MMBtu/hr Hurst boilers and the three 33.475 MMBtu/hr Burnham boilers cumulatively to 33,520 hours per rolling 12-months (EUs: CP01 through CP05, inclusive).
- b. The Permittee shall limit operation of each of the three 2,876 hp Caterpillar emergency standby diesel generators to 2.0 hours per day and to 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: CP13, CP14 and CP17).

- c. The Permittee shall limit operation of the 2,520 hp Caterpillar emergency standby diesel generator to 2.0 hours per day and to 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: CP15).
- d. The Permittee shall limit operation of the 1,818 hp Caterpillar emergency standby diesel generator to 2.0 hours per day and to 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: CP16).
- e. The Permittee shall limit operation of the 430 hp Caterpillar emergency diesel fire pump to 2.0 hours per day and to 36.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: CP18).
- f. The Permittee shall limit operation of each of the two 3,634 hp Caterpillar emergency standby diesel generators to 2.0 hours per day and to 52.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: CP28 and CP29).
- g. The Permittee shall limit operation of each of the 525 hp Clarke diesel fire pumps to 2.0 hours per day and to 52.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: CP34 and CP35).
- h. The Permittee shall limit the consumption of VOC and HAP-containing paints, lacquers, thinners, solvents, etc. for surface coating purposes at the Caesar's Palace Hotel and Casino not exceed either 70.0 gallons per month or 700 gallons per rolling 12-months based on a weighted average VOC content of 7.25 pounds per gallon (EU: CP23).
- i. The Permittee shall limit the maximum throughput of all gasoline products to 18,000 gallons per rolling 12-months and 1,500 gallons per month (EU: CP32).
- j. The Permittee shall not allow woodworking operations to exceed 2,080 hours per rolling 12-months (EU: CP33).

4. Control Requirements

Boilers/Water Heaters

- a. The Permittee shall combust only natural gas in all boilers/heaters.
- b. The Permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's specifications.
- c. The Permittee shall equip each of the two 35.4 MMBtu/hr Hurst boilers with low-NO_x burners (EUs: CP01 and CP02). Each boiler shall emit no more than 29 ppm NO_x and no more than 10 ppm CO (corrected to 3 percent oxygen) during operation.
- d. The Permittee shall equip each of the three 33.475 MMBtu/hr Burnham boilers with low-NO_x burners (EUs: CP03 through CP05, inclusive). Each boiler shall emit no more than 30 ppm NO_x and no more than 10 ppm CO (corrected to 3 percent oxygen) during operation.
- e. The Permittee shall equip each of the four 1.0 MMBtu/hr Gasmaster boilers with low-NO_x burners (EUs: CP06 through CP08, inclusive, and CP10). Each boiler shall emit no more than 14 ppm NO_x and no more than 77 ppm CO (corrected to 3 percent oxygen) during their operation.
- f. The Permittee shall equip each of the two 1.50 MMBtu/hour RBI Futera boilers with low NO_x burners (EUs: CP24 and CP25). Each boiler shall emit no more than 10 ppm NO_x and no more than 50 ppm CO (corrected to 3 percent oxygen) during their operation.

- g. The Permittee shall equip each of the two 24.0 MMBtu/hr Unilux boilers with low-NO_x burners (EUs: CP26 and CP27). Each boiler shall emit no more than 9 ppm NO_x and no more than 50 ppm CO (corrected to 3 percent oxygen) during operation.

Diesel Generators/Fire Pumps

- h. The Permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's specifications. All diesel generators and fire pumps shall combust only low sulfur (<0.05 percent) diesel fuel.
- i. The Permittee shall equip each of the seven Caterpillar emergency standby diesel generators with turbochargers and aftercoolers (EUs: CP13 through CP17, inclusive, CP28, and CP29).
- j. The two Caterpillar diesel engines (EUs: CP28 and CP29) are subject to the provisions of 40 CFR 60 Subpart IIII. Only diesel fuel with maximum sulfur content of 500 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume may be used in these engines.
- k. The Permittee shall equip the Caterpillar emergency diesel fire pump with a turbocharger (EU: CP18).
- l. The Permittee shall equip each of the two Clarke emergency diesel fire pumps with turbochargers and aftercoolers (EUs: CP34 and CP35).
- m. The two Clarke emergency diesel fire pumps (EUs: CP34 and CP35) are subject to the provisions of 40 CFR 60 Subpart IIII. The Permittee shall use only diesel fuel with maximum sulfur content of 500 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume in these engines.
- n. The Permittee shall ensure that emission units CP28, CP29, CP34, and CP35 are in compliance with 40 CFR 60 Subpart IIII by meeting of all of the following: *[40 CFR 60.4206]*
 - i. operation of the engine according to the manufacturer's written instructions or procedures developed by the Permittee that are approved by the engine manufacturer; and
 - ii. the installation and configuration of the engine according to the manufacturer's specifications.
- o. The Permittee shall ensure that emission units CP28, CP29, CP34, and CP35 shall only use, beginning June 1, 2010, diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume. *[40 CFR 60.4207]*

Cooling Towers

- p. The Permittee shall operate and maintain all cooling towers in accordance with the manufacturer's specifications. No chromium-containing compounds shall be used for water treatment. *[40 CFR 63, Subpart Q]*
- q. The Permittee shall equip each of the four Baltimore Aircoil cooling towers shall with drift eliminators with a manufacturer's maximum drift rate of 0.005 percent (EUs: CP19a through CP22, inclusive).
- r. The Permittee shall equip the Composite Cooling Solutions cooling tower with drift eliminators with a manufacturer's maximum drift rate of 0.0015 percent (EUs: CP30a and CP30b).

- s. The Permittee shall maintain the cooling water such that the maximum TDS content shall not exceed 3,000 ppm.

Surface Coating

- t. The Permittee shall not operate spray booths unless all exhaust air passes through appropriate filter media having a particulate capture efficiency of at least 99.0 percent. (This is usually accomplished with tacky filter material that is at least 2 inches thick.) The dry filter media must cover all openings in the spray booth.
- u. The Permittee shall not use open containers for storage or disposal of VOC or HAP-containing cloth or paper (excluding masking tape) used for surface preparation and cleanup.
- v. All filters or other control equipment associated with surface coating operations shall follow manufacturer's specifications for use and operation. Dry filters must be changed at sufficient intervals to prevent a decrease in their effectiveness and prevent them from clogging.
- w. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water), unless the manufacturer's specifications for use indicate a different pressure drop value.
- x. The Permittee shall clean surface coating application equipment in an enclosed container to minimize VOC volatilization into the ambient air.
- y. All containers with VOC and HAP-containing products shall remain securely closed, except during product transfer. Containers shall be inspected regularly for leakage and the contents of any leaking container must be immediately transferred to an appropriately labeled container that has been specifically designed for storage of the compound.
- z. The Permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding, blasting, surface preparation, etc. carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time.

Woodworking

- aa. The Permittee shall connect all wood working processes including cutting, sanding, blasting, and surface preparation to a dust collection system (EU: CP33) at all times when such equipment is in operation. [AQR 19.4.1.1]

Gasoline Dispensing

- bb. The Permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following [40 CFR 63.11116]:
 - i. minimize gasoline spills;
 - ii. clean up spills as expeditiously as practicable;
 - iii. cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
 - iv. minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators;
 - v. the Permittee shall have records documenting gasoline throughput within 24 hours of a request of the Control Officer; and

- vi. the Permittee must comply with the requirements of the 40 CFR 63, Subpart CCCCCC by January 10, 2011.
- cc. Phase I Vapor Recovery. The following control requirements apply to EU: CP32:
 - i. The Fireguard Two Point I Vapor Recovery System shall be constructed in accordance with the "Phase I Vapor Recovery System" drawing, and shall use components specified in the current CARB EO G-70-162 series.
 - ii. The highest point of discharge from a submerged fill-pipe shall be no more than 6.0 inches from the tank bottom.
 - iii. Pursuant to AQR Section 12, all Phase I vapor recovery equipment shall be installed and operated in accordance with the manufacturer's specifications and certification requirements.
 - iv. All Phase I vapor recovery equipment shall be maintained to be leak free, vapor tight, and in good working order.
 - v. All Phase I vapor recovery equipment shall have a CARB-certified device, which prevents loosening or over tightening of the Phase I product adaptor.
 - vi. Each system that has a pressure/vacuum vent valve installed must also meet the standards as outlined in the current CARB EO G-70-162 series.
- dd. Phase II Vapor Recovery. The following requirements apply to the fuel dispensing associated with EU: CP32:
 - i. The Model Name Phase II gasoline vapor control system shall be in accordance with the current CARB EO G-70-17 series.
 - ii. Only Model Emco Wheaton A4005 nozzles or equivalent CARB approved nozzle, are approved for a Model Name Phase II Gasoline Vapor Control System.
 - iii. The gasoline product and vapor return hoses shall be coaxial.
 - iv. The maximum allowable hose length shall be in accordance to the current CARB EO G-70-52 series.
 - v. Breakaway hose(s) shall be CARB approved.
 - vi. Pursuant to AQR Section 12, all Phase II vapor recovery equipment shall be installed and operated in accordance with the manufacturer's specifications and the current CARB EO G-70-17 series.
 - vii. All Phase II vapor recovery equipment shall be maintained to be leak free, vapor tight, and in good working order.
 - viii. Each Balance Vapor Recovery System dispenser shall limit each nozzle's gasoline dispensing rate to the values listed in Table III-E-4. Dispenser fuel flow restrictors shall be installed as necessary and must be CARB approved.

Table III-E-4: Phase II Balance Vapor Recovery Nozzle Requirements¹

Model/Nozzle or Equivalent	Current CARB EO Series	GPM
Emco Wheaton A4005	G-70-17	6-10

¹ A/L Ratio not applicable to Balance Vapor Recovery Systems.

Other

- ee. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.

5. Monitoring

- a. The Permittee shall install and utilize non-resettable hour meters such that the actual operating hours can be established for each applicable boiler (EUs: CP01, CP02, CP03, CP04 and CP05). [AQR 19.4.1.3]
- b. The Permittee shall install and utilize non-resettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: CP01, CP02, CP03, CP04, CP05, CP26, and CP27) [AQR 19.4.1.3 and 40 CFR 60, Subpart Dc]
- c. The Permittee shall monitor operating hours for each applicable diesel engine utilizing non-resettable hour meters when operated for testing, maintenance, or during emergencies. (EUs: CP13, CP14, CP15, CP16, CP17, CP18, CP28, CP29, CP34, and CP35). [AQR 19.4.1.3]
- d. The Permittee shall perform visual emissions checks each calendar quarter on a source-wide level for each emission unit. The quarterly visual checks shall include the boilers, diesel-fired emergency standby generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency standby generators or fire pumps does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3]
- e. When requested by the Control Officer, opacity levels are to be measured and calculated as set forth in 40 CFR Part 86, Subpart I (EUs: CP28, CP29, CP34 and CP35). [40 CFR 68, Subpart I]
- f. The Permittee shall inspect spray paint booth and all ancillary equipment for leaks, malfunctions, proper operation of gauges and pressure drops, each day the booth is operated. A log must be kept of such inspections as well as any corrective actions taken to repair the equipment.
- g. The Permittee shall monitor the TDS in the cooling tower circulating water monthly. The Permittee may use Myron L Ultrameter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 19.4.1.3]
- h. Pursuant to AQR Subsections 12.8.1, the Permittee shall conduct daily inspections for requirements listed in AQR Subsection 52.4 that are associated with the Phase I vapor recovery system to determine if components of the system are defective. [AQR 12.8]

6. Testing

Burner Efficiency Tests

- a. The Permittee operating a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr shall perform burner efficiency tests (boiler tune-ups) on that boiler. Burner efficiency tests shall be conducted in accordance with the manufacturer's specifications and specifications for good combustion practices (EUs: CP01, CP02, CP03, CP04, CP05, CP26, and CP27). [AQR 19.4.1.3, AQR 49]
- b. The Permittee operating a boiler with a maximum heat input rating of 10.0 MMBtu/hr or greater shall perform burner efficiency tests at least twice each year. The tests shall be performed at least five (5) months but no more than seven (7) months apart during each calendar year (EUs: CP01, CP02, CP03, CP04, CP05, CP26, and CP27). If the boiler has a permitted hourly limit of less than 2,000 hours per rolling 12-months, then a burner

efficiency test may be performed at least once each calendar year. Currently no emission units with a heat input rating of 10.0 MMBtu/hr or greater have been proposed to operate for less than 2,000 hours per rolling 12-months. [AQR 19.4.1.3]

- c. If the documented actual hours of operation of a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr are zero (0) during a calendar year, the Permittee may choose not to perform a burner efficiency test on that boiler during that calendar year. To document that the actual hours of operation for that boiler are zero (0) during a calendar year, the Permittee shall install an hour meter prior to the beginning of that calendar year and maintain written records to verify the actual hours of operation during that calendar year. [AQR 19.4.1.3]
- d. If the documented actual hours of operation of a boiler with a maximum heat input rating equal to or greater than 10.0 MMBtu/hr are less than 50 hours during a calendar year, the Permittee may perform a burner efficiency test on that boiler only once during that calendar year. To document that the actual hours of operation for that boiler are less than 50 hours during a calendar year, the Permittee shall install an hour meter prior to the beginning of that calendar year and maintain written records to verify the actual hours of operation during that calendar year. [AQR 19.4.1.3]
- e. A performance test conducted in accordance with AQR Subsection 49.4 may replace a required burner efficiency test as approved by the Control Officer. [AQR 19.4.1.3]

Performance Tests

- f. Performance testing is subject to the requirements of 40 CFR 60 (as amended), and AQR Section 49. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: CP01, CP02, CP03, CP04, CP05, CP26, and CP27). [AQR 19.4.1.3]
- g. Subsequent performance testing shall be conducted at a frequency of no later than once every 5 years from the previous performance test on that boiler. Subsequent performance testing shall be conducted on emission units CP01, CP02, CP03, CP04, CP05, CP26, and CP27. [AQR 19.4.1.3]

Table III-E-5: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NOx	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Boiler Exhaust Outlet Stack	PM ₁₀	EPA Method 9
Stack Gas Parameters	-	EPA Methods 1, 2, 3A, and 4

Note: 40 CFR Part 60, Subpart Dc and AQR Section 49 are applicable to this facility.

- h. Testing of diesel emergency standby generators shall not take place during CO advisories. It is the Permittee's responsibility to satisfy all federal requirements to which this facility is subject.

GDO Performance Testing

- i. The following general performance testing requirements of the Phase I and Phase II apply to the CP32 [AQR 19.4.1.3]:
 - i. Each performance tests shall be conducted in accordance with the applicable CARB Test Procedure that is required by the CARB EO.
 - ii. The source shall give a 7-day written prior notice of the date of the test to the Control Officer.

- iii. Any prior approved scheduled performance test cannot be canceled and/or rescheduled except with the prior approval of the Control Officer.
- iv. Within 60 days from the end of an initial or annual performance test, source shall submit a report containing the results of such test to the Control Officer.
- v. The report shall have, as the first page of text, a signed Certification of Performance Test Results (see Attached).
- j. Each performance test shall be conducted by a DAQEM approved Certified Phase II Vapor Recovery Tester, as defined in AQR Subsection 52.2.
- k. If any performance test fails, then the affected portion of the GDO will be tagged "Out of Order" until corrective action has been taken and the retest passed.
- l. If the source fails a performance test, DAQEM shall be notified within 24 hours or by 12:00 p.m. (Noon) of DAQEM's next business day, whichever is soonest. Repairs to correct the defects shall be made and a retest scheduled with DAQEM. The retest shall be scheduled within 10 calendar days of the failed test. If the repairs and retest cannot be accomplished within 10 calendar days, the source must submit the reasons and a proposed date for retesting in writing to DAQEM for approval.
- m. The source shall conduct performance tests listed in Table III-E-6:

Table III-E-6: Required Performance Test Criterion: Balance System

Description	CARB Test Procedure	Standard
Pressure decay/leak: vapor control system including nozzles and underground tanks	TP-201.3	Initial: 2" wc Final: Referenced Value
Dynamic Back Pressure	TP-201.4	0.5" wc @ 60 SCFH, N ₂ ²
A/L Test ¹	TP-201.5	See Table III-B-1
Dispensing nozzle flow rate ¹	As Specified in EO G-70-17 series	10 gpm (max.)

¹A/L minimum and maximum results by system type U.S. EPA Federal Register, Volume 58, Number 55, Page 16019.

²If the source fails the Dynamic Back Pressure performance test, the source shall be required to comply with additional performance testing requirements in accordance with the applicable EO for this equipment.

- n. Initial Performance Test [AQR 19.4.1.3]:
 - i. The source shall conduct and pass an initial performance test within 30 days of the source commencing operations.
 - ii. The source shall conduct and pass an initial performance test within 30 days of commencing operations of new emission units that require performance testing.
 - iii. The source shall conduct and pass an initial performance test within 30 days of commencing operations of modified emission units that require performance testing.
 - iv. The initial performance test must be witnessed by an inspector from the DAQEM.
- o. Annual Performance Test [AQR 19.4.1.3]:
 - i. Annual performance testing shall be accomplished prior to the anniversary date of the previous performance test that the source passed.
 - ii. Pursuant to AQR Section 4, the Control Officer may require additional testing.

7. Recordkeeping

- a. The Permittee shall maintain records on site that include, at minimum, the following information [AQR 19.4.1.3(b)]:

- i. monthly hour meter readings of each of the boilers/water heaters (EUs: CP01, CP02, CP03, CP04, and CP05);
 - ii. daily amount of natural gas consumed (in MMBtu, scf or therms) for each boiler (EUs: CP01, CP02, CP03, CP04, CP05, CP26, and CP27). [40 CFR 60, Subpart Dc]
 - iii. daily hour meter readings of each diesel emergency standby generator when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: CP13, CP14, CP15, CP16, CP17, CP28, and CP29);
 - iv. daily hour meter readings of each diesel fire pump when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: CP18, CP34, and CP35);
 - v. a log of hour and fuel meter resets if a programmable meter is used;
 - vi. cetane index or aromatic content (in percent by volume) of diesel fuel (EUs: CP28, CP29, CP34, and CP35) [40 CFR 60.4214]
 - vii. sulfur content of diesel fuel certified by the supplier;
 - viii. MSDS or records demonstrating the VOC and HAP content for each compound used for surface coating activities;
 - ix. monthly hours of operation of each cooling tower (EUs: CP19a, CP19b, CP19c, CP20, CP21, CP22, CP30a, CP30b, CP30c, CP31a, CP31b, and CP31c);
 - x. monthly TDS content of cooling tower circulation water;
 - xi. a log book of all inspections, maintenance, and repairs as specified in this document;
 - xii. records of burner efficiency testing as specified in this Operating Permit;
 - xiii. results of performance testing; and
 - xiv. GDO records shall contain, at minimum, the following information (EU: CP32) [AQR 19.4.1.3]:
 - (i) a record of any maintenance on any part of the Phase I equipment, including a general description of the maintenance;
 - (ii) the date and time the equipment was taken out-of-service;
 - (iii) the date of repair or replacement;
 - (iv) a general description of the part location (e.g., pump, tank, nozzle number, etc.);
 - (v) a description of the problem; and
 - (vi) the results of the daily inspections.
- b. The Permittee shall maintain on site and report the following information semi-annually [AQR 19.4.1.3(b)]:
- i. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each boiler/water heater (EUs: CP01, CP02, CP03, CP04, and CP05);
 - ii. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each diesel generator and fire pump (EUs: CP13, CP14, CP15, CP16, CP17, CP28, CP29, CP18, CP34, and CP35);
 - iii. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to surface coating activities (paints, basecoats, primers, reducers, thinners, solvents, etc.);

- iv. monthly and 12-month rolling total of gasoline throughput [40 CFR 63.11116(b)]; and
- v. monthly and rolling 12-month total hours of woodworking operations (EU: CP 33);
- c. For all Inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 19.4.1.3]

F. PARIS CASINO RESORT

1. Emission Units

Table III-F-1: Summary of EU – Paris Casino Resort

EU	Description
PA01	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ06-98-8553, #1
PA03	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8599, #3
PA04	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8606, #4
PA06	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8597, #6
PA09	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8611, #WH 1
PA10	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8609, #WH 2
PA11	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8608, #WH 3
PA12	Bryan Boiler, 3.5 MMBtu/hr, M/N: RV350S-150-FDG-LX, S/N: 81362, #4
PA13	Bryan Boiler, 3.5 MMBtu/hr, M/N: RV350S-150-FDG-LX, S/N: 81349, #5
PA14	Bryan Boiler, 17.0 MMBtu/hr, M/N: RW1700W-FDG-LX, S/N: 81458, #3
PA15	Bryan Boiler, 21.0 MMBtu/hr, M/N: RW2100W-FDG-LX, S/N: 81444, #1
PA16	Bryan Boiler, 21.0 MMBtu/hr, M/N: RW2100W-FDG-LX, S/N: 81457, #2
PA17	Cummins Emergency Standby Diesel Generator, M/N: CW73-G, S/N: 74753-1, 2,100kW, 2,816 hp, #1
PA18	Cummins Emergency Standby Diesel Generator, M/N: CW73-G, S/N: 74739-2, 2,100kW, 2,816 hp, #2
PA19	Baltimore Aircoil Cooling Tower, M/N: Series 3000, S/N: 97221981, 4,725 gpm, 3,000 ppm TDS, 0.005% Drift Loss, 2-Cell, #1
PA20	Baltimore Aircoil Cooling Tower, M/N: Series 3000, S/N: 97222011, 4,725 gpm, 3,000 ppm TDS, 0.005% Drift Loss, 2-Cell, #2
PA21	Baltimore Aircoil Cooling Tower, M/N: Series 3000, S/N: 97222021, 4,725 gpm, 3,000 ppm TDS, 0.005% Drift Loss, 2-Cell, #3
PA22	Baltimore Aircoil Cooling Tower, M/N: Series 3000, S/N: 97221991, 4,725 gpm, 3,000 ppm TDS, 0.005% Drift Loss, 2-Cell, #4
PA23	Baltimore Aircoil Cooling Tower, M/N: Series 3000, S/N: 97222022, 4,725 gpm, 3,000 ppm TDS, 0.005% Drift Loss, 2-Cell, #5
PA24	Spray Systems Inc. Paint Booth (7'7"x7'9"x10'2"), M/N: I-887, S/N: N/A
PA25	Dust Collector for woodworking operations, Donaldson Torit DCE Unimaster, M/N: UMA358K11AD, S/N: 97-1572
PA26	RBI Futera Fusion Boiler, 2.0 MMBtu/hr, M/N: CW2000N0, S/N: 020745337
PA27	RBI Futera Fusion Boiler, 2.0 MMBtu/hr, M/N: CW2000N0, S/N: 020745338

2. Emission Limitations

- a. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-F-2:

Table III-F-2: PTE (tons per rolling 12-months) – Paris Casino Resort

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
PA01 ¹	1.90 MMBtu/hr	All units 25,200 hour rolling 12- months cap	0.18	1.17	1.96	0.01	0.13	0.05
PA03 ¹	1.90 MMBtu/hr							
PA04 ¹	1.90 MMBtu/hr							
PA06 ¹	1.90 MMBtu/hr							
PA09 ¹	1.90 MMBtu/hr							
PA10 ¹	1.90 MMBtu/hr							
PA11 ¹	1.90 MMBtu/hr							
PA12	3.5 MMBtu/hr	---	0.11	0.48	1.27	0.01	0.08	0.03
PA13	3.5 MMBtu/hr	---	0.11	0.48	1.27	0.01	0.08	0.03
PA14	17.0 MMBtu/hr	4,380 hr/yr	0.28	1.36	3.15	0.02	0.20	0.07
PA15 ²	21.0 MMBtu/hr	4,380 hr/yr Combined	0.34	1.68	3.89	0.03	0.25	0.09
PA16 ²	21.0 MMBtu/hr							
PA17	2,816 hp, 2,100 kW	52.0 hr/yr	0.05	1.76	0.40	0.03	0.05	0.01
PA18	2,816 hp, 2,100 kW	52.0 hr/yr	0.05	1.76	0.40	0.03	0.05	0.01
PA19	4,725 gal/min	---	0.73	0.00	0.00	0.00	0.00	0.00
PA20	4,725 gal/min	---	0.73	0.00	0.00	0.00	0.00	0.00
PA21	4,725 gal/min	---	0.73	0.00	0.00	0.00	0.00	0.00
PA22	4,725 gal/min	---	0.73	0.00	0.00	0.00	0.00	0.00
PA23	4,725 gal/min	---	0.73	0.00	0.00	0.00	0.00	0.00
PA24	7.25 lbs/gal VOC	500 gal/yr	0.00	0.00	0.00	0.00	1.81	1.15
PA25	3,000 cfm	2,080 hr/yr	0.53	0.00	0.00	0.00	0.00	0.00
PA26	2.0 MMBtu/hr	---	0.07	0.11	0.32	0.01	0.05	0.01
PA27	2.0 MMBtu/hr	---	0.07	0.11	0.32	0.01	0.05	0.02

¹Emissions and operation of the seven Patterson-Kelly boilers (PA01, PA03, PA04, PA06, PA09, PA10 and PA11) have combined limitations as indicated in the Table above.

²Emissions and operation of the two Bryan boilers (PA15 and PA16) have combined limitations as indicated in the Table above.

- b. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-F-3:

Table III-F-3: PTE (pounds per hour) – Paris Casino Resort

EU	Rating	NO _x /CO (ppm) ¹	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
PA14	17.0 MMBtu/hr	NO _x 30/CO 114	0.13	0.62	1.44	0.01	0.09	0.03
PA15	21.0 MMBtu/hr	NO _x 30/CO 114	0.16	0.77	1.78	0.01	0.11	0.04
PA16	21.0 MMBtu/hr	NO _x 30/CO 114	0.16	0.77	1.78	0.01	0.11	0.04

¹ Corrected to 3 percent oxygen

- c. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

3. Production Limitations

- a. The Permittee shall limit operation of the seven 1.90 MMBtu/hr Patterson-Kelley water heaters to 25,200 hours per rolling 12-months cumulatively (EUs: PA01, PA03, PA04, PA06, PA09, PA10, and PA 11).
- b. The Permittee shall limit operation of the 17.0 MMBtu/hr Bryan boiler to 4,380 hours per rolling 12-months (EU: PA14).

- c. The Permittee shall limit operation of the two 21.0 MMBtu/hr Bryan boilers to cumulatively 4,380 hours per rolling 12-months (EUs: PA15 and PA16).
- d. The Permittee shall limit operation of each of two the 2,816 hp Cummins emergency standby diesel generators to 2.0 hours per day and 52.0 hours per rolling 12-months. These limits do not apply during emergencies (EUs: PA17 and PA18).
- e. The Permittee shall limit the consumption of VOC and HAP-containing paints, lacquers, thinners, solvents, etc. for surface coating purposes at the Paris Casino Resort not to exceed either 50.0 gallons per month or 500 gallons per rolling 12-months based on a weighted average VOC content of 7.25 pounds per gallon (EU: PA24).
- f. The Permittee shall not allow woodworking operations to exceed 2,080 hours per rolling 12-months (EU: PA25).

4. Control Requirements

Boilers/Water Heaters

- a. The Permittee shall combust only natural gas in all boilers/heaters.
- b. The Permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's specifications.
- c. The Permittee shall equip each of the seven 1.90 MMBtu/hr Patterson-Kelly water heaters with low-NO_x burners (EUs: PA01, PA03, PA04, PA06, PA09, PA10, and PA11). Each boiler shall emit no more than 40.2 ppm NO_x and no more than 110.5 ppm CO (corrected to 3 percent oxygen) during operation.
- d. The Permittee shall equip each of the two 3.5 MMBtu/hour Bryan boilers low-NO_x burners and flue gas recirculation (EUs: PA12 and PA13). Each boiler shall emit no more than 26 ppm NO_x and no more than 111 ppm CO (corrected to 3 percent oxygen) during operation.
- e. The Permittee shall equip the 17.0 MMBtu/hr Bryan boiler with a low-NO_x burner (EU: PA14). The boiler shall emit no more than 30 ppm NO_x and no more than 114 ppm CO (corrected to 3 percent oxygen) during operation.
- f. The Permittee shall equip each of the two 21.0 MMBtu/hr Bryan boilers with low-NO_x burners (EUs: PA15 and PA16). Each boiler shall emit no more than 30 ppm NO_x and no more than 114 ppm CO (corrected to 3 percent oxygen) during operation.
- g. The Permittee shall equip each of the two 2.0 MMBtu/hour RBI Futera boilers with low-NO_x burners (EUs: PA26 and PA27). Each boiler shall emit no more than 10 ppm NO_x and no more than 50 ppm CO.

Diesel Generators

- h. The Permittee shall operate and maintain all diesel generators in accordance with the manufacturer's specifications. All diesel generators and fire pumps shall combust only low sulfur (<0.05 percent) diesel fuel.
- i. The Permittee shall equip each of the two Cummins emergency standby diesel generators with turbochargers (EUs: PA17 and PA18).

Cooling Towers

- j. The Permittee shall operate and maintain all cooling towers in accordance with the manufacturer's specifications. No chromium-containing compounds shall be used for water treatment. [40 CFR 63, Subpart Q]

- k. The Permittee shall equip each of the five Baltimore Aircoil cooling towers with drift eliminators with a manufacturer's maximum drift rate of 0.005 percent (EUs: PA19 through PA23, inclusive).
- l. The Permittee shall maintain the cooling water such that the maximum TDS content shall not exceed 3,000 ppm.

Surface Coating

- m. The Permittee shall not operate spray booths unless all exhaust air passes through appropriate filter media having a particulate capture efficiency of at least 99.0 percent. (This is usually accomplished with tacky filter material that is at least 2 inches thick.) The dry filter media must cover all openings in the spray booth.
- n. The Permittee shall not use open containers for storage or disposal of VOC or HAP-containing cloth or paper (excluding masking tape) used for surface preparation and cleanup.
- o. The Permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding, blasting, surface preparation, etc. carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time.
- p. All filters or other control equipment associated with surface coating operations shall follow manufacturer's specifications for use and operation. Dry filters must be changed at sufficient intervals to prevent a decrease in their effectiveness and prevent them from clogging.
- q. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water), unless the manufacturer's specifications for use indicate a different pressure drop value.
- r. The Permittee shall clean surface coating application equipment in an enclosed container to minimize VOC volatilization into the ambient air.
- s. All containers with VOC and HAP-containing products shall remain securely closed, except during product transfer. Containers shall be inspected regularly for leakage and the contents of any leaking container must be immediately transferred to an appropriately labeled container that has been specifically designed for storage of the compound.

Woodworking

- t. The Permittee shall connect all wood working processes including cutting, sanding, blasting, and surface preparation to a dust collection system (EU: PA25) at all times when such equipment is in operation. [AQR 19.4.1.1]

Other

- u. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.

5. Monitoring

- a. The Permittee shall install and utilize non-resettable fuel meters such that the consumption of natural gas can be established for each applicable boiler (EUs: PA14, PA15, and PA16). [AQR 19.4.1.3, 40 CFR 60, Subpart Dc]

- b. The Permittee shall install and utilize non-resettable hour meters such that the actual operating hours can be established for each applicable boiler (EUs: PA01, PA03, PA04, PA06, PA09, PA10, PA11, PA14, PA15, and PA16) [AQR 19.4.1.3,]
- c. The Permittee shall monitor operating hours for each applicable diesel engine utilizing non-resettable hour meters when operated for testing, maintenance, or during emergencies. (EUs: PA17 and PA18). [AQR 19.4.1.3]
- d. The Permittee shall perform visual emissions checks each calendar quarter on a source-wide level for each emission unit. The quarterly visual checks shall include the boilers, diesel-fired emergency standby generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency standby generators or fire pumps does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3]
- e. The Permittee shall inspect spray paint booth and all ancillary equipment for leaks, malfunctions, proper operation of gauges and pressure drops, each day the booth is operated. A log must be kept of such inspections as well as any corrective actions taken to repair the equipment.
- f. The Permittee shall monitor the TDS in the cooling tower circulating water monthly. The Permittee may use Myron L Ultrameter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 19.4.1.3]

6. Testing

Burner Efficiency Tests

- a. The Permittee operating a boiler with a maximum heat input rating of 10.0 MMBtu/hr or greater shall perform burner efficiency tests at least twice each year. The tests shall be performed at least five (5) months but no more than seven (7) months apart during each calendar year (EUs: PA14, PA15, and PA16). [AQR 19.4.1.3]
- b. If the documented actual hours of operation of a boiler with a maximum heat input rating equal to or greater than 10.0 MMBtu/hr are less than 50 hours during a calendar year, the Permittee may perform a burner efficiency test on that boiler only once during that calendar year. To document that the actual hours of operation for that boiler are less than 50 hours during a calendar year, the Permittee shall install an hour meter prior to the beginning of that calendar year and maintain written records to verify the actual hours of operation during that calendar year. [AQR 19.4.1.3]
- c. A performance test conducted in accordance with AQR Subsection 49.4 may replace a required burner efficiency test as approved by the Control Officer. [AQR 19.4.1.3]

Performance Tests

- d. Performance testing is subject to the requirements of 40 CFR 60 (as amended), and AQR Section 49. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr. (EUs: PA14, PA15, and PA16) [AQR 19.4.1.3]
- e. Subsequent performance testing shall be conducted at a frequency of no later than once every 5 years from the previous performance test on that boiler. Subsequent performance testing shall be conducted on emission units PA14, PA15, and PA16. [AQR 19.4.1.3]

Table III-F-4: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Boiler Exhaust Outlet Stack	PM ₁₀	EPA Method 9
Stack Gas Parameters	-	EPA Methods 1, 2, 3A, and 4

Note: 40 CFR Part 60, Subpart Dc and AQR Section 49 are applicable to this facility.

- f. Testing of diesel emergency standby generators shall not take place during CO advisories. It is the Permittee's responsibility to satisfy all federal requirements to which this facility is subject.

7. Recordkeeping

- a. The Permittee shall maintain records on site that include, at minimum, the following information [AQR 19.4.1.3(b)]:
 - i. monthly hour meter readings of each of the boilers/water heaters (EUs: PA01, PA03, PA04, PA06, PA09, PA10, PA11, PA12, PA13, PA14, PA15, and PA16);
 - ii. daily amount of natural gas consumed (in MMBtu, scf or therms) for each boiler (EUs: PA14, PA15, and PA16); [40 CFR 60, Subpart Dc]
 - iii. daily hour meter readings of each diesel emergency standby generator when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: PA17, and PA18);
 - iv. a log of hour and fuel meter resets if a programmable meter is used;
 - v. sulfur content of diesel fuel certified by the supplier;
 - vi. MSDS or records demonstrating the VOC and HAP content for each compound used for surface coating and printing activities;
 - vii. monthly hours of operation of each cooling tower (EUs: PA19, PA20, PA21, PA22, and PA23);
 - viii. monthly TDS content of cooling tower circulation water;
 - ix. a log book of all inspections, maintenance, and repairs as specified in this document;
 - x. records of burner efficiency testing; and
 - xi. results of performance testing.
- b. The Permittee shall maintain on site and report the following information semi-annually [AQR 19.4.1.3(b)]:
 - i. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each boiler/water heater (EUs: PA01, PA03, PA04, PA06, PA09, PA10, PA11, PA12, PA13, PA14, PA15, and PA16);
 - ii. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each diesel generator (EUs: PA17, and PA18);
 - iii. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to surface coating activities (paints, basecoats, primers, reducers, thinners, solvents, etc.);
 - iv. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to printing activities (inks, developers fountain solutions, alcohol substitutes, cleaning solutions, solvents, etc.);
 - v. monthly and rolling 12-month total hours of woodworking operations (EU: PA25);

- c. For all Inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 19.4.1.3]

G. IMPERIAL PALACE

1. Emission Units

Table III-G-1: Summary of EU – Imperial Palace

EU	Description
IP01	Ajax Boiler, 1.25 MMBtu/hr, M/N: WG-1250 D, S/N: 82-34510
IP02	Ajax Boiler, 1.25 MMBtu/hr, M/N: WG-1250 D, S/N: 82-34507
IP03	Ajax Boiler, 1.25 MMBtu/hr, M/N: WG-1250 D, S/N: 82-34502
IP04	Kewanee Boiler, 16.70 MMBtu/hr, M/N: H3S 4000HP, S/N: R8190
IP05	Kewanee Boiler, 16.70 MMBtu/hr, M/N: H3S 4000GO, S/N: R8191
IP06	Caterpillar Emergency Standby Diesel Generator, M/N: 3412, S/N: 81Z01351, 507 kW, 680 hp
IP07	Caterpillar Emergency Standby Diesel Generator, M/N: 3412, S/N: 81Z04033, 563 kW, 755 hp
IP08	Caterpillar Emergency Standby Diesel Generator, M/N: 3412, S/N: 81Z07511, 664 kW, 890 hp
IP09	Caterpillar Emergency Standby Diesel Generator, M/N: 3412, S/N: 81Z08595, 664 kW, 890 hp
IP10	Detroit Diesel Emergency Standby Generator, M/N: 7083-7305, S/N: 263120414, 280 kW, 375 hp
IP11	Detroit Diesel Emergency Standby Generator, M/N: 580FDF, S/N: JB95613, 500 kW, 670 hp
IP13	Baltimore Air Coil Cooling Tower, M/N: 15368, S/N:U025238201MAD, 1,104 gpm, 3,000 ppm, 0.002% Drift Loss
IP14	Baltimore Air Coil Cooling Tower, M/N: 15368, S/N:U025238202MAD, 1,104 gpm, 3,000 ppm, 0.002% Drift Loss
IP15	RSD Cooling Tower, M/N: RSD-60, S/N: 96061, 200 gpm, 3,000 ppm TDS, 0.005% Drift Loss
IP16	RSD Cooling Tower, M/N: RSD-015, S/N: 07290, 45 gpm, 3,000 ppm TDS, 0.005% Drift Loss
IP17	RSD Cooling Tower, M/N: RSD-030, S/N: 4110, 90 gpm, 3,000 ppm TDS, 0.005% Drift Loss
IP18	Evapco Cooling Tower, M/N: AT19314, S/N: W016699, 440 gpm, 3,000 ppm TDS, 0.001% Drift Loss
IP21	Evapco Cooling Tower, M/N: ATC165, S/N: 988621W, 200 gpm, 3,000 ppm TDS, 0.001% Drift Loss
IP22	RSD Cooling Tower, M/N: RSD-60, S/N: 88201, 150 gpm, 3,000 ppm TDS, 0.005% Drift Loss
IP24	Evapco Cooling Tower, M/N: AT19311, S/N: W016698, 444 gpm, 3,000 ppm TDS, 0.001% Drift Loss
IP25	RSD Cooling Tower, M/N: RSD-30-RT, S/N: 89251, 100 gpm, 3,000 ppm TDS, 0.005% Drift Loss
IP26	Spray Paint Booth (21'x 50')
IP27	Heidelberg Printing Press, M/N: SORDZ, S/N 503668
IP28	Heidelberg Printing Press, M/N: SORM, S/N: 503739
IP29	Heidelberg Printing Press, M/N: H222, S/N: 71498
IP30	ATF Chief Printing Press, M/N: 2.17, S/N: 219-7857
IP31	ATF Chief Printing Press, M/N: 2.17, S/N: 222-9102
IP32	Evapco Cooling Tower, M/N: ATC165B, S/N: 5123770, 300 gpm, 3,000 ppm TDS, 0.001% Drift Loss
IP33	Evapco Cooling Tower, M/N: ATC165B, S/N: 5123771, 300 gpm, 3,000 ppm TDS, 0.001% Drift Loss
IP34	Air Sentry, Inc. Dust Collector for Woodworking Operations; M/N: 205055CP; S/N: 1216
IP35	Evapco Cooling Tower, M/N: ATC-165B, S/N: 8349770, 270 gpm, 3,000 ppm TDS, 0.001% Drift Loss

2. Emission Limitations

- a. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-G-2:

Table III-G-2: PTE (tons per rolling 12-months) – Imperial Palace

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
IP01 ¹	1.25 MMBtu/hr	15,000 hr/yr Combined	0.07	0.46	0.77	0.01	0.05	0.02
IP02 ¹	1.25 MMBtu/hr							
IP03 ¹	1.25 MMBtu/hr							
IP04	16.70 MMBtu/hr	---	0.55	3.58	5.43	0.04	0.39	0.14
IP05	16.70 MMBtu/hr	---	0.55	3.58	5.43	0.04	0.39	0.14
IP06	680 hp, 507 kW	52.0 hr/yr	0.01	0.42	0.10	0.01	0.01	0.01
IP07	755 hp, 563 kW	52.0 hr/yr	0.01	0.47	0.11	0.01	0.01	0.01
IP08	890 hp, 664 kW	52.0 hr/yr	0.02	0.56	0.13	0.01	0.02	0.01
IP09	890 hp, 664 kW	52.0 hr/yr	0.02	0.56	0.13	0.01	0.02	0.01
IP10	375 hp, 280 kW	52.0 hr/yr	0.02	0.30	0.07	0.02	0.02	0.01
IP11	670 hp, 500 kW	52.0 hr/yr	0.01	0.42	0.10	0.01	0.01	0.01
IP13	1,104 gal/min	---	0.07	0.00	0.00	0.00	0.00	0.00
IP14	1,104 gal/min	---	0.07	0.00	0.00	0.00	0.00	0.00
IP15	200 gal/min	---	0.03	0.00	0.00	0.00	0.00	0.00
IP16	45 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00
IP17	90 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00
IP18	440 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00
IP21	200 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00
IP22	150 gal/min	---	0.02	0.00	0.00	0.00	0.00	0.00
IP24	444 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00
IP25	100 gal/min	---	0.02	0.00	0.00	0.00	0.00	0.00
IP26	7.25 lbs/gal VOC	700 gal/yr	0.00	0.00	0.00	0.00	2.54	1.61
IP27 ²	4.33 lbs/gal VOC	129 gal/month 1,292 gal/rolling 12-months Combined	0.00	0.00	0.00	0.00	2.31	1.09
IP28 ²								
IP29 ²								
IP30 ²								
IP31 ²								
IP32	300 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00
IP33	300 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00
IP34	2,600 cfm	2,080 hr/yr	0.46	0.00	0.00	0.00	0.00	0.00
IP35	270 gal/min	---	0.01	0.00	0.00	0.00	0.00	0.00

¹Emissions and operation of the three Ajax boilers (IP01, IP02, and IP03) have combined limitations as indicated in the Table above.

²Emissions and operation of the five printing presses (IP27, IP28, IP29, IP30, and IP31) have combined limitations as indicated in the Table above.

- b. Neither the actual nor the allowable emissions from the individual emission units shall exceed the calculated PTE listed in Table III-G-3:

Table III-G-3: PTE (pounds per hour) – Imperial Palace

EU	Rating	NO _x /CO (ppm) ¹	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
IP04	16.70 MMBtu/hr	NO _x 40.2/CO 100	0.13	0.82	1.24	0.01	0.09	0.03
IP05	16.70 MMBtu/hr	NO _x 40.2/CO 100	0.13	0.82	1.24	0.01	0.09	0.03

¹ Corrected to 3 percent oxygen

- c. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1.1]

3. Production Limitations

- a. The Permittee shall limit operation of the three 1.25 MMBtu/hr Ajax boilers to 15,000 hours per rolling 12-months, cumulatively (EUs: IP01 through IP03, inclusive).
- b. The Permittee shall limit operation of the 680 hp Caterpillar emergency standby diesel generator to 2.0 hours per day and 52.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: IP06).
- c. The Permittee shall limit operation of the 755 hp Caterpillar emergency standby diesel generator to 2.0 hours per day and 52.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: IP07).
- d. The Permittee shall limit operation of each of the two 890 hp Caterpillar emergency standby diesel generators to 2.0 hours per day and 52.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EUs: IP08 and IP09).
- e. The Permittee shall limit operation of the 375 hp Detroit Diesel emergency standby diesel generator to 2.0 hours per day and 52.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: IP10).
- f. The Permittee shall limit operation of the 670 hp Detroit Diesel emergency standby diesel generator to 2.0 hours per day and 52.0 hours per rolling 12-months for testing and maintenance purposes only. These limits do not apply during emergencies (EU: IP11).
- g. The Permittee shall limit the consumption of VOC and HAP-containing paints, lacquers, thinners, solvents, etc. for surface coating purposes at the Imperial Palace Hotel and Casino not to exceed either 70.0 gallons per month or 700 gallons per rolling 12-months based on a weighted average VOC content of 7.25 pounds per gallon (EU: IP26).
- h. The Permittee shall limit the consumption of VOC and HAP-containing inks, developers, cleaners, solutions, solvents, etc. for printing purposes at the Imperial Palace Hotel and Casino not to exceed either 129 gallons per month or 1,292 gallons per rolling 12-months (EUs: IP27 through IP31, inclusive).
- i. The Permittee shall not allow woodworking operations to exceed 2,080 hours per rolling 12-months (EU: IP34).

4. Control Requirements

Boilers/Water Heaters

- a. The Permittee shall combust only natural gas in all boilers/heaters.
- b. The Permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's specifications.
- c. The Permittee shall equip each of the three 1.25 MMBtu/hr Ajax boilers with low-NO_x burners (EUs: IP01 through IP03, inclusive). Each boiler shall emit no more than 40.2 ppm NO_x and no more than 110.5 ppm CO (corrected to 3 percent oxygen) during operation.
- d. The Permittee shall equip each of the two 16.70 MMBtu/hr Kewanee boilers with low-NO_x burners (EUs: IP04 and IP05). Each boiler shall emit no more than 40.2 ppm NO_x and no more than 100 ppm CO (corrected to 3 percent oxygen) during operation.

Diesel Generators

- e. The Permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's specifications. All diesel generators and fire pumps shall combust only low sulfur (<0.05 percent) diesel fuel.
- f. The Permittee shall equip each of the four Caterpillar emergency standby diesel generators with turbochargers and aftercoolers (EUs: IP06 through IP09, inclusive).
- g. The Permittee shall equip each of the two Detroit Diesel emergency standby diesel generators with turbochargers (EUs: IP10 and IP11).

Cooling Towers

- h. The Permittee shall operate and maintain all cooling towers in accordance with the manufacturer's specifications. No chromium-containing compounds shall be used for water treatment. [40 CFR 63, Subpart Q]
- i. The Permittee shall equip the Baltimore Aircoil cooling tower with drift eliminators with a manufacturer's maximum drift rate of 0.002 percent (EU: IP14).
- j. The Permittee shall equip each of the five RSD cooling towers with drift eliminators with a manufacturer's maximum drift rate of 0.005 percent (EUs: IP15, IP16, IP17, IP22, and IP25).
- k. The Permittee shall equip each of the five Evapco cooling towers with drift eliminators with a manufacturer's maximum drift rate of 0.001 percent (EUs: IP21, IP24, IP32, IP33, and IP35).
- l. The Permittee shall maintain the cooling water such that the maximum TDS content shall not exceed 3,000 ppm.

Surface Coating

- m. The Permittee shall not operate spray booths unless all exhaust air passes through appropriate filter media having a particulate capture efficiency of at least 99.0 percent. (This is usually accomplished with tacky filter material that is at least 2 inches thick.) The dry filter media must cover all openings in the spray booth.
- n. The Permittee shall not use open containers for storage or disposal of VOC or HAP-containing cloth or paper (excluding masking tape) used for surface preparation and cleanup.
- o. All filters or other control equipment associated with surface coating operations shall follow manufacturer's specifications for use and operation. Dry filters must be changed at sufficient intervals to prevent a decrease in their effectiveness and prevent them from clogging.
- p. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water), unless the manufacturer's specifications for use indicate a different pressure drop value.
- q. The Permittee shall clean surface coating application equipment in an enclosed container to minimize VOC volatilization into the ambient air.
- r. All containers with VOC and HAP-containing products shall remain securely closed, except during product transfer. Containers shall be inspected regularly for leakage and the contents of any leaking container must be immediately transferred to an appropriately labeled container that has been specifically designed for storage of the compound.

- s. The Permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding, blasting, surface preparation, etc. carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time.

Woodworking

- t. The Permittee shall connect all wood working processes including cutting, sanding, blasting, and surface preparation to a dust collection system (EU: IP34) at all times when such equipment is in operation. [AQR 19.4.1.1]

Printing Operations

- u. The Permittee shall use no-VOC or low-VOC washes, fountain solutions, alcohol substitutes and inks for printing purposes whenever possible. These substitutions shall be included in the annual report to the Control Officer. No changes in the currently used process chemicals to products with higher VOC content may be made with prior approval from the Control Officer.
- v. Spent wash for printing purposes shall be stored in a Department of Transportation (DOT)-approved barrel or container which shall be closed at all times when not being filled. All wash solution tanks shall be inspected daily for leaks.

Other

- w. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.

5. Monitoring

- a. The Permittee shall install and utilize non-resettable hour meters such that the actual operating hours can be established for each applicable boiler (EUs: IP01, IP02, and IP03) [AQR 19.4.1.3]
- b. The Permittee shall install and utilize non-resettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: IP04 and IP05) [AQR 19.4.1.3, 40 CFR 60, Subpart Dc]
- c. The Permittee shall monitor operating hours for each applicable diesel engine utilizing non-resettable hour meters when operated for testing, maintenance, or during emergencies. (EUs: IP06, IP07, IP08, IP09, IP10, and IP11). [AQR 19.4.1.3]
- d. The Permittee shall perform visual emissions checks each calendar quarter on a source-wide level for each emission unit. The quarterly visual checks shall include the boilers, diesel-fired emergency standby generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency standby generators or fire pumps does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3]
- e. The Permittee shall inspect spray paint booth and all ancillary equipment for leaks, malfunctions, proper operation of gauges and pressure drops, each day the booth is operated. A log must be kept of such inspections as well as any corrective actions taken to repair the equipment.

- f. The Permittee shall monitor the TDS in the cooling tower circulating water monthly. The Permittee may use Myron L Ultrameter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 19.4.1.3]

6. Testing

Performance Tests

- a. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr. (EUs: IP04 and IP05) [AQR 19.4.1.3]
- b. Subsequent performance testing shall be conducted at a frequency of no later than once every 5 years from the previous performance test on that boiler. Subsequent performance testing shall be conducted on emission units IP04 and IP05. [AQR 19.4.1.3]

Table III-G-4: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NOx	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Boiler Exhaust Outlet Stack	PM ₁₀	EPA Method 9
Stack Gas Parameters	-	EPA Methods 1, 2, 3A, and 4

Note: 40 CFR Part 60, Subpart Dc is applicable to this facility.

- c. Testing of diesel emergency standby generators shall not take place during CO advisories. It is the Permittee's responsibility to satisfy all federal requirements to which this facility is subject.

7. Recordkeeping

- a. The Permittee shall maintain records on site that include, at minimum, the following information [AQR 19.4.1.3(b)]:
 - i. monthly hour meter readings of each of the boilers/water heaters (EUs: IP01, IP02 and IP03);
 - ii. daily amount of natural gas consumed (in MMBtu, scf or therms) for each boiler (EUs: IP04 and IP05); [40 CFR 60, Subpart Dc]
 - iii. daily hour meter readings of each diesel emergency standby generator when operated for testing and maintenance purposes, and separately for use during emergencies (EUs: IP06, IP07, IP08, IP09, IP10, and IP11);
 - iv. a log of hour and fuel meter resets if a programmable meter is used;
 - v. sulfur content of diesel fuel certified by the supplier;
 - vi. MSDS or records demonstrating the VOC and HAP content for each compound used for surface coating and printing activities;
 - vii. monthly hours of operation of each cooling tower (EUs: IP12, IP13, IP14, IP15, IP16, IP17, IP18, IP21, IP22, IP23, IP24, IP25, IP32, IP33, and IP35);
 - viii. monthly TDS content of cooling tower circulation water;
 - ix. a log book of all inspections, maintenance, and repairs as specified in this document; and
 - x. results of performance testing.

- b. The Permittee shall maintain on site and report the following information semi-annually [AQR 19.4.1.3(b)]:
 - i. monthly total of operating hours to demonstrate compliance with the 12-month rolling hour limits for each boiler/water heater (EUs: IP01, IP02 and IP03);
 - ii. monthly total of operating hours to demonstrate compliance with 12-month rolling hour limits for each diesel generator (EUs: IP06, IP07, IP08, IP09, IP10, and IP11);
 - iii. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to surface coating activities (paints, basecoats, primers, reducers, thinners, solvents, etc.);
 - iv. monthly and rolling 12-month total consumption (in gallons) of each VOC-containing compound related to printing activities (inks, developers fountain solutions, alcohol substitutes, cleaning solutions, solvents, etc.); and
 - v. monthly and rolling 12-month total hours of woodworking operations (EU: IP34)
- c. For all Inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 19.4.1.3]

IV. MITIGATION

The source has no federal offset requirements. [AQR 59.1.1]

V. OTHER REQUIREMENTS

- 1. The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a chlorofluorocarbon (CFC) or hydrochlorofluorocarbon (HCFC) compound as a working fluid, unless such fluid has been approved for sale in such use by the Administrator. The Permittee shall keep record of all paperwork relevant to the applicable requirements of 40 CFR 82 on site. [40 CFR 82]

VI. PERMIT SHIELD

Compliance with the terms contained in this permit shall be deemed compliance with the following applicable requirements in effect on the date of permit issuance:

Table VI-1: Applicable Requirements Related to Permit Shield

Citation	Title
40 CFR Part 60, Subpart Dc	Standards of Performance for New Stationary Sources (NSPS) – Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 60, Subpart IIII	Standards of Performance for New Stationary Sources (NSPS) – Stationary Compression Ignition (CI) Internal Combustion Engines (ICE)

ATTACHMENTS

1. APPLICABLE REGULATIONS

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. Nevada Revised Statutes (NRS), Chapter 445B.
2. Clark County Air Quality Regulations (AQR) Applicable AQR Sections:

Citation	Title
AQR Section 0	Definitions
AQR Section 4	Control Officer
AQR Section 11	Ambient Air Quality Standards
AQR Section 12.1	General application requirements for construction of new and modified sources of air pollution
AQR Section 12.2.2	Requirements for specific air pollutants: PM ₁₀ emission source located in the Serious Non-Attainment Area
AQR Section 12.2.7	Requirements for specific air pollutants: CO sources located in the Serious Non-Attainment Area
AQR Section 12.2.12	Requirements for specific air pollutants: VOC sources located in the Management Area
AQR Section 12.2.	Requirements for specific air pollutants: NO _x sources located in the Management Area
AQR Section 12.2.16	Requirements for specific air pollutants: SO ₂ sources located in the PSD area
AQR Section 12.2.19	Requirements for specific air pollutants: TCS sources in Clark County
AQR Section 12.5	Air Quality Models
AQR Section 14.1.1 Subpart A	New Source Performance Standards (NSPS) General Provisions
AQR Section 14.1.15 Subpart Dc	New Source Performance Standards – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units
AQR Section 16	DAQEM Operating Permits
AQR Section 18	Permit and Technical Service Fees
AQR Section 19	40 CFR Part 70 Operating Permits
AQR Section 24	Sampling and Testing - Records and Reports
AQR Section 25	Upset/Breakdown, Malfunctions
AQR Section 26	Emissions of Visible Air Contaminants
AQR Section 28	Fuel Burning Equipment
AQR Section 29	Sulfur Content of Fuel Oil
AQR Section 40	Prohibition of Nuisance Conditions
AQR Section 41	Fugitive Dust
AQR Section 42	Open Burning
AQR Section 43	Odors in the Ambient Air
AQR Section 49	Emission Standards for Boilers and Steam Generators Burning Fossil Fuels
AQR Section 55	Preconstruction review for New or Modified Stationary Sources in the 8-Hour Ozone Nonattainment Area
AQR Section 60	Evaporation and Leakage
AQR Section 70.4	Emergency Procedures
AQR Section 80	Circumvention

3. Clean Air Act, as amended (CAA), Authority: 42 U.S.C. § 7401, et seq
4. Title 40 of the Code of Federal Regulations (40 CFR) Applicable 40 CFR Subsections:

Citation	Title
40 CFR Part 52.21	Prevention of Significant Deterioration (PSD)
40 CFR Part 52.1470	SIP Rules
40 CFR Part 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions
40 CFR Part 60, Subpart Dc	Standards of Performance for New Stationary Sources (NSPS) – Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 60, Subpart IIII	Standards of Performance for New Stationary Sources (NSPS) – Stationary Compression Ignition (CI) Internal Combustion Engines (ICE)
40 CFR Part 70	Federally Mandated Operating Permits
40 CFR Part 82	Protection of Stratospheric Ozone