



DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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**FINAL ACTION REPORT PART 70 OPERATING PERMIT
(INITIAL PERMIT)**

Harrah's Operating Company
Source: 257

Public Notice: Review-Journal October 12, 2009.
Public Comment: October 12, 2009 to November 10, 2009

Comments Received: Harrah's Operating Company (HOC)

Public Hearings: No public hearing was held.

Issuance date: December 30, 2009
Expiration date: December 29, 2014

DAQEM received comments from HOC. No comments were received from the EPA, the public, or any other agencies.

Copies of comments received and responses to those comments are part of this final action report. All responders shall receive an electronic copy of this report, the final Title V permit, and the final TSD.

COMMENTS RECEIVED FROM HARRAH'S OPERATING COMPANY AND DAQEM RESPONSE

DAQEM received comments for the source on November 10, 2009 and the relevant parts of the comments are provided below:

HOC Comment 1:

- 1) The current Authority to Construct/Operating Permit (ATC/OP) does not require hour meters for dust collection devices and estimation of monthly hours is explicitly permitted; however, the proposed Title V deleted the reference to "estimating" and requires monthly and 12-month total hours for woodworking operations. HOC requests that DAQEM clarify whether or not hour meters will be required in order to maintain compliance with operating and recordkeeping conditions or whether the practice of estimating run-times may continue. If hour meters will be required, HOC requests a reasonable timeline for installation.

DAQEM Response: DAQEM does not require installation of hour meters on dust collection devices. The monthly and rolling 12-months hours of woodworking operations shall be recorded through the use of logbooks and accurate run-times record keeping. HOC may choose to install and utilize hour meters for tracking of run-times of dust collection devices.

HOC Comment 2:

- 2) The current ATC/OP does not require hour meters for cooling towers and estimation of monthly hours is explicitly allowed; however, the word “estimated” was removed from the permit language in the proposed Title V. HOC requests that DAQEM clarify whether or not hour meters will be required in order to maintain compliance with recordkeeping conditions or whether estimated hours of operation can still be used. Note that all cooling towers associated with Source 257 are permitted for 8,760 hours/year run-time. If hour meters will be required, HOC requests a reasonable timeline for installation.

DAQEM Response: DAQEM does not require hour meters for cooling towers. The monthly and rolling 12-months hours of cooling towers operations shall be recorded through the use of logbooks and accurate record keeping of operating times. DAQEM recognizes that all cooling towers are permitted to operate 8,760 hours per year. However, the actual operating hours are used for calculation of actual PM₁₀ emissions. HOC may choose to install hour meters for cooling towers to simplify record keeping of the operating hours.

HOC Comment 3:

- 3) The proposed Title V specifies test methods for monitoring the total dissolved solids (TDS) in the cooling tower circulating water. It is HOC’s understanding that utilizing a Myron L Ultrameter (or similar) to measure conductivity and TDS is a DAQEM-approved method. HOC requests confirmation from DAQEM that this is an acceptable method for testing TDS.

DAQEM Response: DAQEM accepts measurement of conductivity and total dissolved solids (TDS) with Myron L Ultrameter (or similar) as an acceptable method for testing TDS in cooling tower water. Permit conditions are changed accordingly.

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]

HOC Comment 4:

- 4) The proposed Title V requires various types of emission units (e.g., boilers and emergency generators) to have non-resettable hour meters. It is our understanding, based on previous discussions with DAQEM staff, that programmable hour and fuel meters are acceptable metering devices. Furthermore, most new advanced metering devices are programmable. HOC requests confirmation from DAQEM that the use of programmable meters is acceptable and meets the intent of the “non-resettable” meter requirement.

DAQEM Response: DAQEM concurs that programmable hour and fuel meters are acceptable metering devices. Consequently, these devices meet the intent of the “non-resettable” meter equipment. However, all the resets of the meter program shall be recorded in the logbook and reported on the semi-annual report.

The following condition is added in the record keeping section:

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

“a log of hour and fuel meter resets if a programmable meter is used;”

HOC Comment 5:

- 5) The proposed Title V requires HOC to ensure that proper diesel fuel is used for engines; specifically, HOC must ensure that the sulfur, cetane and/or aromatics of the diesel fuel are within permit specifications. HOC requests clarification regarding the type of recordkeeping required to meet this permit condition. Instead of keeping the bill of lading or receipt for each delivery, HOC would like to demonstrate compliance by obtaining a statement from the supplier that the maximum contents will not exceed the amounts required by the permit. Such a statement would be received from any new supplier of diesel fuel. We request confirmation from DAQEM that this is an acceptable recordkeeping practice.

In addition, it appears that there is a typographical error in the permit and the word “insure” should be “ensure.” HOC requests that DAQEM correct this typographical error in the diesel fuel requirement sections of the permit for all facilities.

DAQEM Response: DAQEM requires Certificate of Analysis (COA), Certificate of Conformance (COC), bill of lading (BOL), or similar certificate to ensure that proper diesel fuel is used. However, DAQEM will accept the statement from each supplier that the maximum fuel content will not exceed the amount required by the permit. Additionally, the accuracy of each statement should be verified semi-annually with an actual COA, COC, or BOL.

The following condition is changed in the record keeping section:

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

“sulfur content of diesel fuel certified by the supplier”

DAQEM corrected the typographical errors.

HOC Comment 6:

- 6) HOC requests a change to the emission unit description for “emergency generators” to say “emergency standby generators” to be more consistent with the terms used in the Clark County Air Quality Regulations (AQR). It is HOC’s understanding that these emission units are permitted to provide electrical power for either emergency or standby use associated with life safety and general business functions during the loss of utility power, as well as limited operation for testing and maintenance purposes.

DAQEM Response: DAQEM accepts a change to the emission unit description from “emergency generator” to “emergency standby generator”.

HOC Comment 7:

- 7) The proposed Title V requires quarterly visible emissions checks of each emission unit’s exhaust. It is HOC’s understanding that formal Method 22 is not required for this quarterly check and permittees will only need to check if smoke is visibly present. HOC requests confirmation from DAQEM regarding our understanding of this requirement.

DAQEM Response: DAQEM requires visual emissions checks each calendar quarter on a source-wide level for each emission unit. Unless stated otherwise, formal Method 22 is not required. However, if visible emissions are observed during a visual emissions check, the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9.

The Part 70 OP conditions state:

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 generators and fire pumps while operating to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency 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]

HOC Comment 8:

- 8) HOC requests clarification regarding monthly and rolling 12-month recordkeeping and reporting requirements. It is HOC's understanding that for all emission units, we are required to keep logs of monthly hours and/or consumption to demonstrate compliance with 12-month rolling limits. We are not required to submit 12-months of data as part of any partial-calendar year reports. HOC requests confirmation from DAQEM regarding this interpretation of the recordkeeping and reporting requirements for all facilities and also requests that permit language be modified to appropriately reflect this understanding.

DAQEM Response: DAQEM requires records of 12-month rolling limits for operating hours and/or consumption to demonstrate a continuous compliance. Therefore, HOC is required to demonstrate compliance with the annual limits every month by adding the actual data for past 12 months. Consequently, HOC is required to submit 12-month totals with each semi-annual report. Each report should cover a period of 12-months.

HOC Comment 9:

- 9) It is HOC's understanding that the reporting dates will be on a calendar basis. It is also HOC's understanding that the initial Annual Compliance Certification Report is due 1 year and 30 days after the initial Title V permit issuance. HOC requests clarification whether the Annual Compliance Certification Report will remain due on the same date for all future years. If the Title V permit is ever revised or modified, HOC requests that the report due date stay consistent with previous years.

DAQEM Response: HOC shall submit to DAQEM the Annual Compliance Certification (ACC) Report within 30 days after the Title V permit issuance anniversary date. The ACC report due date will stay constant until Title V permit is renewed. Accordingly, the new due date will be 1 year and 30 days after the issuance of the renewed Title V permit. A revision of the permit would not change the ACC reporting due date.

HOC Comment 10:

- 10) The current ATC/OP and Clark County AQR require quarterly reporting; however, the proposed Title V only requires semi-annual reporting. It is HOC's understanding that the federal regulations and proposed (new) AQR only require reporting semi-annually and this Title V permit reflects the proposed (new) AQR. Based on this understanding, HOC assumes that we will operate under the proposed (new) AQR. HOC requests that DAQEM provide further clarification regarding the applicable requirements and regulations.

DAQEM Response: DAQEM established HOC reporting requirements in the Part 70 OP based on the federal regulations and the proposed AQR that require semi-annual reporting for Title V sources. Thus, DAQEM decided to change HOC reporting requirements from quarterly to semi-annual. HOC shall follow the Part 70 OP reporting requirements once issued.

HOC Comment 11:

- 11) There is a typographical error on page 31 in the paragraph, "3. Production Limitations." The word "to" is repeated. Please correct this error.

DAQEM Response: The typographical error is corrected.

HOC Comment 12:

- 12) There is a grammatical error (double negative) in the Production Limitations sections for all paint spray booths and printing presses. One example is located on page 52, item 3 (g): "...not exceed neither 70.0 gallons per month nor 700 gallons per rolling 12-months." A possible correction would be to change "neither" and "nor" to "either" and "or." Please correct this error throughout the permit.

DAQEM Response: The grammatical errors are corrected.

All the corrections/changes mentioned in the comments above have been incorporated in the final Part 70 OP and TSD.

There were no other comments from the public or from EPA Region 9.