

TECHNICAL SUPPORT DOCUMENT

TECHNICAL INFORMATION PRESENTED IN REVIEW OF AN
APPLICATION FOR A PART 70 OPERATING PERMIT

for

HARRAH'S OPERATING COMPANY, INC.

Part 70 Operating Permit Number: 257

SIC Code - 7011: Hotels and Motels

NAICS Code: 721120 – Hotels, Resort, with Casinos



Clark County
Department of Air Quality and Environmental Management
Permitting Section

July 2009

This Technical Support Document (TSD) accompanies the proposed Part 70 Operating Permit for Harrah's Operating Company, Inc.

TABLE OF CONTENTS

	Page
I. EXECUTIVE SUMMARY	3
II. ACRONYMS	4
III. SOURCE INFORMATION.....	5
A. General.....	5
B. Description of Processes.....	5
C. Permitting History	5
D. Operating Scenario.....	6
E. Proposed Exemptions	7
IV. EMISSIONS INFORMATION.....	7
A. Total Source Potential to Emit.....	7
B. Emission Units and PTE.....	7
C. Testing.....	24
V. REGULATORY REVIEW.....	26
A. Local Regulatory Requirements	26
B. Federally Applicable Regulations	29
VI. COMPLIANCE.....	30
A. Compliance Certification.....	30
B. Compliance Summary	30
VII. EMISSION REDUCTION CREDITS (OFFSETS).....	34
VIII. ADMINISTRATIVE REQUIREMENTS.....	34

I. EXECUTIVE SUMMARY

The Harrah's Operating Group, Inc. (HOC) is a major source for NO_x and synthetic minor source for CO, and minor source for all other regulated air pollutants. The source is located at One Caesar's Palace Drive, Las Vegas, Nevada, in the Las Vegas Valley airshed, hydrographic basin number 212. Hydrographic basin 212 is designated as basic nonattainment for CO and PM₁₀, unclassified non-attainment area for 8-hour ozone (regulated through NO_x and VOC), and PSD for all other regulated air pollutants. The Harrah's Operating Company, Inc. (HOC) owns and operates several adjacent and continuous hotels and casinos grouped under the 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.

DAQEM has permitting responsibilities for all emission units which includes boilers, diesel generators and fire pumps, cooling towers, gasoline dispensing operations, and woodshops at the source. The permitting history of this source reflects the changes in air quality permitting practices both at the local and federal levels in response to changing environmental regulations. This is an initial Part 70 Operating Permit for this source. The potential emissions for the source are shown in the table below.

Table 1-1: Source PTE (tons per year)

PM ₁₀	NO _x	CO	SO ₂	VOC	HAP
37.32	83.50	65.47	1.80	22.76	9.95

DAQEM received the initial Title V application on August 24, 2005. A revision to the initial Title V application was received on May 15, 2008. Based on the information submitted by the applicant and a technical review performed by DAQEM staff, DAQEM proposes the issuance of a Part 70 Operating Permit to Harrah's Operating Company, Inc.

II. ACRONYMS

Table II-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
BCC	Clark County Board of County Commissioners
BHP	Brake Horse Power
CAO	Field Corrective Action Order
CE	Control Efficiency
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
EF	Emission Factor
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
HP	Horse Power
kW	kilowatt
MMBtu	Millions of British Thermal Units
NAC	Nevada Administrative Code
NAICS	North American Industry Classification System
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
scf	Standard Cubic Feet
SCC	Source Classification Codes
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
TSD	Technical Support Document
VOC	Volatile Organic Compound

III. SOURCE INFORMATION

A. General

Permittee	Harrah's Operating Company, Inc.
Mailing Address	One Caesar's Palace Drive Las Vegas, NV 89109
Responsible Official	Tom Jenkin
Contacts	Rebecca Johnson and Eric Dominquez
Phone Number	(702) 407-6067
Fax Number	(702) 407-6079
Facilities 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
Hydrographic Area	212
Township, Range, Section	T21S, R61E, Sections 16, 17 & 21
SIC Code	7011 – Hotels and Motels
NAICS Code	721120 – Casino Hotels

B. Description of Processes

The HOC properties are all hotel and casino facilities. For all of the facilities, the key processes are heating and cooling both water and air with boilers and cooling towers, and using emergency generators to produce electricity. There are some ancillary activities, such as carpentry and spray painting for which dust collectors and paint spray booths are used. All boilers and heaters utilize natural gas and emergency generators use low-sulfur diesel fuel. Cyclones, dust collectors, and paint spray booths are operated on electricity. The Standard Industrial Classification (SIC) for all properties is 7011, Hotels and Motels.

C. Permitting History

On June 13, 2005, Harrah's and Caesars Entertainment, Inc., properties were merged and now conduct business under the name of Harrah's Operating Company, Inc (HOC). In a letter dated June 24, 2005, DAQEM notified HOC that several of the properties involved in the merger were consolidated into a single source for permitting under the Clark County AQR. A January 16, 2006, letter from DAQEM requested additional information regarding contiguous properties and requested consolidation of all contiguous properties owned by HOC. Previously, the properties operated as minor sources under individual permits. The properties are:

- Harrah's Las Vegas
- Imperial Palace Hotel and Casino
- Caesars Palace Hotel and Casino
- Flamingo Las Vegas
- Bally's Las Vegas
- Paris Casino Resort

The above properties are collectively referred to as the Consolidated Properties. In February 2007, HOC purchased the facility known as Barbary Coast Hotel and Casino (Source Number 611). The property is adjacent to the Flamingo Hotel and Casino and became part of the Consolidated Properties. The facility name was changed to "Bill's Gambler's Hall and Saloon," effective February 28, 2007. A change of ownership notification was submitted and the emission units for this facility were incorporated into the ATC/OP for the HOC. These facilities operate under a consolidated authority to construct/operating permit (ATC/OP). The current NSR permit is the Authority to Construct/Operating Permit, Harrah's Operating Company, Inc. (7 sources), Source: 257, Modification 12, Revision 0.

Prior to the consolidation, the individual properties that now make up the HOC were permitted under multiple source numbers. Table III-C-1 lists the original source numbers, original NSR permit dates, and the most recent NSR permit dates for the sources that make up the consolidated Harrah's Operating Group, Inc., Part 70 Operating Permit. The Title V application for the consolidated HOC properties was submitted to DAQEM on August 24, 2005. Revisions to this application were submitted to DAQEM on May 15, 2008, and March 18, 2009.

Table III-C-1: Permitting History

Source	Initial Source Number	Initial NSR Permit Issuance Date	Current Source Number	Current NSR Permit Issuance Date
Harrah's Las Vegas	257	12/15/1992	257	06/25/2009
Imperial Palace Hotel and Casino	613	09/01/1991	257	06/25/2009
Caesar's Palace Hotel and Casino	276	09/15/1998	257	06/25/2009
Flamingo Las Vegas	73	07/05/1991	257	06/25/2009
Bally's Las Vegas	256	12/03/1973	257	06/25/2009
Paris Casino Resort	749	09/24/1999	257	06/25/2009
Bill's Gambler's Hall & Saloon	611	12/16/1991	257	06/25/2009

D. Operating Scenario

The HOC properties are all hotel and casino facilities. Each facility operates 8,760 hours per year. Permitted operating hours for each emission unit were provided by the source. It should be noted that for some facilities, similar emission units are grouped together in the permit. The individual emission unit's permitted operating hours may be greater than those allowed for the group of emission units. For example, while five boilers may each be allowed to operate for up to 8,760 hours per year, the maximum allowable hours for the group of boilers may be less than the possible 43,800 hours. This permitting strategy allows for limiting emissions while still allowing for operational flexibility. Where groups of emission units are limited in their combined hours of operation, the limitations are specified in the permit.

E. Proposed Exemptions

There are no restrictions for the operation of the diesel emergency generators during emergency situations as defined in Section 0 of the AQR.

IV. EMISSIONS INFORMATION

A. Total Source Potential to Emit

Harrah's Operating Company, Inc., is a major source for NO_x, a synthetic minor source for CO, and minor source for PM₁₀, SO_x, VOC, HAP, and TCS:

Table IV-A-1: Source-wide PTE (tons per year)

Pollutant	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Source Total	37.32	83.50	65.47	1.80	22.76	9.95
Major Source Thresholds	70	50	70	70	50	25 ¹

¹25 tons for combination of all HAPs (no single HAP exceeds 10 tons).

B. Emission Units and PTE

The following tables summarize the allowable limits for each emission unit.

HARRAH'S LAS VEGAS

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

EU	Description	SCC	Type ¹
HA06	Bryan Boiler, 4.50 MMBtu/hr, M/N: RV450-S-150-FDG; S/N: 66726 (#5)	10300602	---
HA07	Bryan Boiler, 9.0 MMBtu/hr, M/N: LM900-S-15-FDG, S/N: 66665 (#4)	10300602	F1
HA08	Cleaver Brooks Boiler, 8.369 MMBtu/hr, M/N: CB.200-200; S/N: L-70272; (#1)	10300602	F1
HA09	Cleaver Brooks Boiler, 8.369 MMBtu/hr, M/N: CB.200-200; S/N: L-70271; (#2)	10300602	F1
HA10	Cleaver Brooks Boiler, 8.369 MMBtu/hr, M/N: CB.200-200; S/N: L-70270; (#3)	10300602	F1
HA11	Universal Energy Boiler, 4.80 MMBtu/hr, M/N: BF108C; S/N: 10341-1; (#6)	10300602	---
HA12	Caterpillar Emergency Diesel Fire Pump, M/N: 3406BD1, S/N: 6TB06046, 276 kW, 370 hp	20200102	---
HA13	Detroit Diesel Generator; M/N: 81637416, S/N: 2A98775, 800 kW, 1,232 hp	20200102	EE1
HA14	Caterpillar Emergency Diesel Generator; MN: 3412, S/N: 81Z09924.0, 600 kW, 890 hp	20200102	EE1
HA15	Detroit Diesel Generator; M/N: 71237305, S/N: 12VA069124, 400 kW, 536 hp	20200102	EE1
HA16	Detroit Diesel Generator; M/N: 71237305, S/N: 12VA069593, 400 kW, 536 hp	20200102	EE1
HA17	Detroit Diesel Generator; M/N: 71237305, S/N: 12VA066655, 400 kW, 536 hp	20200102	EE1
HA18	Caterpillar Emergency Diesel Generator; M/N: 3412; S/N: 2WJ00740, 880 kW, 1,180 hp	20200102	EE1
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	38500102	P1

EU	Description	SCC	Type ¹
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	38500102	P1
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	38500102	P1
HA23	Global Finishing Solutions Spray Paint Booth, M/N: FP10812.100	40200101	SC1
HA24	John Deere Emergency Diesel Generator, M/N: 6081AF001, S/N: RG6081A159143, 180 kW, 305 hp	20200102	EE1
HA25	Murphy-Rogers dust collector, Model MRM-12-4D(42B), S/N: 1839	30700808	---

¹Type codes for billing: F1 = Fuel burning equipment; EE1 = Stationary emergency IC engine 500 through 1,500 hp; P1 = Process equipment, SC1 = Commercial Surface Coating. The N and M superscripts refer to new or modified units for the purposes of review and issuance fees for this permitting action.

Table IV-B-2: Categorically Exempt EU – Harrah's Las Vegas

Emission Unit Description
Raypak Pool Heater, 0.726 MMBtu/hr (HA22)
Diesel aboveground storage tank, 2,933 gallons
Diesel aboveground storage tank, 1,000 gallons
Diesel aboveground storage tank, 25 gallons
Diesel aboveground storage tank, 25 gallons
Diesel aboveground storage tank, 25 gallons
Diesel aboveground storage tank, 25 gallons
Diesel aboveground storage tank, 50 gallons
Diesel aboveground storage tank, 50 gallons
Diesel aboveground storage tank, 266 gallons
Diesel aboveground storage tank, 572 gallons

Table IV-B-3: PTE (tons per year) - Harrah's Las Vegas

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
HA06	4.50 MMBtu/hr	8,760 hr/yr	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
HA12	370 hp, 276 kW	26.0 hr/yr	0.01	0.21	0.04	0.01	0.02	0.01
HA13	1,232 hp, 800 kW	26.0 hr/yr	0.02	0.53	0.12	0.01	0.02	0.01
HA14	890 hp, 600 kW	26.0 hr/yr	0.01	0.38	0.09	0.01	0.01	0.01
HA15	536 hp, 400 kW	26.0 hr/yr	0.02	0.30	0.06	0.02	0.02	0.01
HA16	536 hp, 400 kW	26.0 hr/yr	0.02	0.30	0.06	0.02	0.02	0.01
HA17	536 hp, 400 kW	26.0 hr/yr	0.02	0.30	0.06	0.02	0.02	0.01
HA18	1,180 hp, 880 kW	26.0 hr/yr	0.01	0.51	0.12	0.01	0.01	0.01
HA19	7,200 gal/min	8,760 hr/yr	0.94	0.00	0.00	0.00	0.00	0.00
HA20	7,200 gal/min	8,760 hr/yr	0.94	0.00	0.00	0.00	0.00	0.00
HA21	7,200 gal/min	8,760 hr/yr	0.94	0.00	0.00	0.00	0.00	0.00
HA23	1.68 lbs/gal VOC	395.0 gal/yr	0.00	0.00	0.00	0.00	1.81	1.15
HA24	305 hp, 180 kW	26.0 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
Subtotal			4.71	5.57	5.87	0.20	2.71	1.50

Table IV-B-4: PTE (pounds per hour) - Harrah's Las Vegas

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
HA06	4.50 MMBtu/hr	8,760 hr/yr	0.03	0.05	0.17	0.01	0.02	0.01
HA07	9.0 MMBtu/hr	6,000 hr/yr	0.07	0.33	0.33	0.01	0.05	0.02
HA08	8.369 MMBtu/hr	20,000 hr/yr	0.06	0.12	0.31	0.01	0.05	0.02
HA09	8.369 MMBtu/hr		0.06	0.12	0.31	0.01	0.05	0.02
HA10	8.369 MMBtu/hr		0.06	0.12	0.31	0.01	0.05	0.02
HA11	4.80 MMBtu/hr	5,000 hr/yr	0.04	0.18	0.18	0.01	0.03	0.01
HA12	370 hp, 276 kW	36.0 hr/yr	0.81	11.47	2.47	0.76	0.93	0.02
HA13	1,232 hp, 800 kW	36.0 hr/yr	0.86	29.57	6.78	0.50	0.87	0.04
HA14	890 hp, 600 kW	36.0 hr/yr	0.62	21.36	4.90	0.36	0.63	0.03
HA15	536 hp, 400 kW	36.0 hr/yr	1.18	16.62	3.58	1.10	1.35	0.02
HA16	536 hp, 400 kW	36.0 hr/yr	1.18	16.62	3.58	1.10	1.35	0.02
HA17	536 hp, 400 kW	36.0 hr/yr	1.18	16.62	3.58	1.10	1.35	0.02
HA18	1,180 hp, 880 kW	36.0 hr/yr	0.83	28.32	6.49	0.48	0.83	0.04
HA19	7,200 gal/min	8,760 hr/yr	0.21	0.00	0.00	0.00	0.00	0.00
HA20	7,200 gal/min	8,760 hr/yr	0.21	0.00	0.00	0.00	0.00	0.00
HA21	7,200 gal/min	8,760 hr/yr	0.21	0.00	0.00	0.00	0.00	0.00
HA23	1.68 lbs/gal VOC	395.0 gal/yr	0.00	0.00	0.00	0.00	0.32	0.15
HA24	305 hp, 180 kW	36.0 hr/yr	0.67	9.46	2.04	0.63	0.77	0.01
HA25	3,900 cfm	2,080 hr/yr	0.67	0.00	0.00	0.00	0.00	0.00
Subtotal			8.95	150.96	35.03	6.09	8.65	0.45

FLAMINGO LAS VEGAS

Table IV-B-5: Summary of EU – Flamingo Las Vegas

EU	Description	SCC	Type ¹
FL01	Johnston Boiler, 14.343 MMBtu/hr, M/N: 8786, S/N: 9180-01	10300602	F1
FL02	Kewanee Boiler, 14.645 MMBtu/hr, M/N: H3S-350-G, S/N: 10016	10300602	F1
FL03	Kewanee Boiler, 14.645 MMBtu/hr, M/N: H3S-350-G, S/N: 10017	10300602	F1
FL04	Kewanee Boiler, 14.645 MMBtu/hr, M/N: H3S-350-G, S/N: 10476	10300602	F1
FL05	Cleaver Brooks Boiler, 8.165 MMBtu/hr, M/N: CBI 700-200-150, S/N: 0L104650	10300602	F1
FL06	Caterpillar Emergency Diesel Fire Pump, M/N: 3406, S/N: 6TB02994, 313 kW, 420 hp	20200102	---
FL07	Caterpillar Emergency Diesel Generator, M/N: 3508, S/N: 23Z02549, 825 kW, 1,106 hp	20200102	EE1
FL08	Caterpillar Emergency Diesel Generator, M/N: 3508, S/N: 23Z02351, 825 kW, 1,106 hp	20200102	EE1
FL09	Caterpillar Emergency Diesel Generator, M/N: 3412, S/N: 2WJ02515, 827 kW, 1,109 hp	20200102	EE1
FL10	Caterpillar Emergency Diesel Generator, M/N: 3412, S/N: 2WJ02570, 827 kW, 1,109 hp	20200102	EE1
FL11	Caterpillar Emergency Diesel Generator, M/N: 3412, S/N: 81Z08892, 540 kW, 724 hp	20200102	EE1
FL12	Detroit Diesel Emergency Diesel Generator, M/N: 71237305, S/N: 12VA064532, 415 kW, 556 hp	20200102	EE1
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	38500101	P1
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	38500101	P1

EU	Description	SCC	Type ¹
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	38500101	P1
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	38500101	P1
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	38500101	P1
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	38500101	P1
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	38500101	P1
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	38500101	P1
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	38500101	P1
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	38500101	P1
FL23	Devilbiss Spray Paint Booth, M/N: XVS-6081	40200101	SC1
FL24	Murphy-Rogers dust collector, Model MRM-10-2D, S/N: 1181	30700808	---
FL25	500-gallon, ConVault aboveground gasoline storage tank	40600306	T2

¹Type codes for billing: F1 = Fuel burning equipment; EE1 = Stationary emergency IC engine 500 through 1,500 hp; P1 = Process equipment, SC1 = Commercial Surface Coating; T2 = Gasoline Storage Tank.

Table IV-B-6: Categorically Exempt EU – Flamingo Las Vegas

Emission Unit Description
Diesel underground storage tank, 8,000 gallons
Diesel underground storage tank, 2,500 gallons
Diesel underground storage tank, 1,000 gallons

Table IV-B-7: PTE (tons per year) – Flamingo Las Vegas

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
FL01	12.6 MMBtu/hr	8,760 hr/yr	0.47	2.22	4.43	0.04	0.34	0.12
FL02	14.645 MMBtu/hr	8,760 hr/yr	0.48	3.13	2.38	0.04	0.35	0.12
FL03	14.645 MMBtu/hr	8,760 hr/yr	0.48	3.13	2.38	0.04	0.35	0.12
FL04	14.645 MMBtu/hr	8,760 hr/yr	0.48	3.13	2.38	0.04	0.35	0.12
FL05	8.165 MMBtu/hr	8,760 hr/yr	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 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	8,760 hr/yr	1.28	0.00	0.00	0.00	0.00	0.00
FL14		8,760 hr/yr						
FL15		8,760 hr/yr						
FL16		8,760 hr/yr						
FL17	12,000 gal/min	8,760 hr/yr	1.86	0.00	0.00	0.00	0.00	0.00
FL18		8,760 hr/yr						
FL19		8,760 hr/yr						
FL20		8,760 hr/yr						

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
FL21		8,760 hr/yr						
FL22		8,760 hr/yr						
FL23	4.4 lbs/gal VOC	1,297 gal/yr	0.00	0.00	0.00	0.00	2.20	1.03
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
Subtotal			5.87	15.65	13.65	0.27	3.92	1.66

Table IV-B-8: PTE (pounds per hour) – Flamingo Las Vegas

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
FL01	12.6 MMBtu/hr	6,000 hr/yr	0.11	0.51	1.01	0.01	0.08	0.03
FL02	14.645 MMBtu/hr	6,000 hr/yr	0.11	0.71	0.54	0.01	0.08	0.03
FL03	14.645 MMBtu/hr	6,000 hr/yr	0.11	0.71	0.54	0.01	0.08	0.03
FL04	14.645 MMBtu/hr	6,000 hr/yr	0.11	0.71	0.54	0.01	0.08	0.03
FL05	8.165 MMBtu/hr	8,760 hr/yr	0.06	0.29	0.33	0.01	0.04	0.02
FL06	420 hp, 313 kW	24.0 hr/yr	0.92	13.02	2.81	0.86	1.06	0.02
FL07	1,006 hp, 825 kW	24.0 hr/yr	0.77	26.54	6.08	0.45	0.78	0.03
FL08	1,006 hp, 825 kW	24.0 hr/yr	0.77	26.54	6.08	0.45	0.78	0.03
FL09	1,109 hp, 827 kW	24.0 hr/yr	0.78	26.62	6.10	0.45	0.78	0.03
FL10	1,109 hp, 827 kW	24.0 hr/yr	0.78	26.62	6.10	0.45	0.78	0.03
FL11	724.0 hp, 540 kW	24.0 hr/yr	0.51	17.38	3.98	0.29	0.51	0.02
FL12	556 hp, 415 kW	24.0 hr/yr	1.22	17.24	3.71	1.14	1.40	0.03
FL13	8,400 gal/min	8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL14		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL15		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL16		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL17	12,000 gal/min	8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL18		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL19		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL20		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL21		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL22		8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
FL23	4.4 lb/gal VOC	1,297 gal/yr	0.00	0.00	0.00	0.00	2.12	0.99
FL24	2,600 cfm	2,080 hr/yr	0.45	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	0.01	0.01
Subtotal			7.40	156.89	37.82	4.14	8.58	1.33

BALLY'S LAS VEGAS

Table IV-B-9: Summary of EU – Bally's Las Vegas

EU	Description	SCC	Type ¹
BA01	Kewanee Boiler, 16.8 MMBtu/hr, M/N: H3S-750-G02, S/N: NB-24935	10300602	F1
BA02	Kewanee Boiler, 16.8 MMBtu/hr, M/N: H3S-750-G02, S/N: NB-25232	10300602	F1
BA03	Kewanee Boiler, 31.383 MMBtu/hr, M/N: H3S-750-G02, S/N: NB-24875	10300602	F1
BA04	Detroit Diesel Emergency Diesel Generator, M/N: 9163-7305, S/N: 16E0006591 (#1), 1,000 kW, 1,340 hp	20100102	EE1
BA05	Detroit Diesel Emergency Diesel Generator, M/N: 9163-7305, S/N: 16E01006592 (#2), 1,000 kW, 1,340 hp	20100102	EE1
BA06	Detroit Diesel Emergency Diesel Generator, M/N: 7163-7305, S/N: 16VA7496, 500 kW, 670 hp	20100102	EE1
BA07	Detroit Diesel Emergency Diesel Generator, S/N: LD-94032, 150 kW, 200 hp	20100102	---

EU	Description	SCC	Type ¹
BA08	Cummins Emergency Diesel Fire Pump, M/N: NT855-F2, S/N: 10923797, 285 hp; Fire Pump # 1	20100102	---
BA09	Cummins Emergency Diesel Fire Pump, M/N: NT855-F2, S/N: 10923795, 285 hp; Fire Pump # 2	20100102	---
BA10	Cummins Emergency Diesel Fire Pump, M/N: NT855-F, S/N: 10949266, 179 hp; Fire Pump # 3	20100102	---
BA11	Detroit Diesel Emergency Diesel Generator, M/N: 1000 DS, S/N: 600214, (#3) 1,000 kW, 1,340 hp	20100102	EE1
BA12	Detroit Diesel Emergency Diesel Generator, M/N: 1000 DS, S/N: 600215, (#4) 1,000 kW, 1,340 hp	20100102	EE1
BA13	Spray King Paint Booth, M/N: 200 FAFC, S/N: N/A, 14'x20'X10'	40200101	SC1
BA14	Baltimore Aircoil Cooling Tower, M/N: IMT-1700-3, S/N: IS6062, 20,400 gpm, 3,000 ppm TDS, 0.005% drift loss	38500101	P1
BA15	Baltimore Aircoil Cooling Tower, M/N: FI-743-L, S/N: 96200451, 130 gpm, 3,000 ppm TDS, 0.001% drift loss	38500101	---
BA16	Econoline Syphon Blast Cabinet, Model 36-1, with a Dayton Model 2Z982H dust collection system	30900204	---

¹Type codes for billing: F1 = Fuel burning equipment; EE1 = Stationary emergency IC engine 500 through 1,500 hp; P1 = Process equipment, SC1 = Commercial Surface Coating.

Table IV-B-10: Categorically Exempt EU – Bally's Las Vegas

Emission Unit Description
Diesel underground storage tank, 6,000 gallons
Diesel underground storage tank, 2,000 gallons
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S

Table IV-B-11: PTE (tons per year) – 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	5.0 lbs/gal VOC	660.0 gal/yr	0.00	0.00	0.00	0.00	2.19	1.03
BA14	20,400 gal/min	8,760 hr/yr	3.26	0.00	0.00	0.00	0.00	0.00
BA15	130.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
BA16	422.2 lbs/hr	2,080 hr/yr	0.30	0.00	0.00	0.00	0.00	0.00
Subtotal			4.73	7.33	3.04	0.17	3.06	1.38

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

Table IV-B-12: PTE (pounds per hour) – 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	0.13	0.51	0.29	0.01	0.09	0.03
BA02 ¹	16.8 MMBtu/hr		0.13	0.51	0.29	0.01	0.09	0.03
BA03	31.383 MMBtu/hr	2,920 hr/yr	0.24	0.96	0.54	0.02	0.17	0.06
BA04	1,340 hp, 1,000 kW	36.0 hr/yr	0.94	32.16	7.37	0.54	0.94	0.04
BA05	1,340 hp, 1,000 kW	36.0 hr/yr	0.94	32.16	7.37	0.54	0.94	0.04
BA06	670 hp, 500 kW	36.0 hr/yr	0.47	16.08	3.69	0.27	0.47	0.02
BA07	200 hp, 155 kW	36.0 hr/yr	0.44	6.20	1.34	0.41	0.50	0.01
BA08	285 hp, 212 kW	36.0 hr/yr	0.63	8.84	1.90	0.58	0.72	0.01
BA09	285 hp, 212 kW	36.0 hr/yr	0.63	8.84	1.90	0.58	0.72	0.01
BA10	179 hp, 134 kW	36.0 hr/yr	0.39	5.55	1.20	0.37	0.45	0.01
BA11	1,340 hp, 1,000 kW	36.0 hr/yr	0.94	32.16	7.37	0.54	0.94	0.04
BA12	1,340 hp, 1,000 kW	36.0 hr/yr	0.94	32.16	7.37	0.54	0.94	0.04
BA13	5.0 lbs/gal VOC	660.0 gal/yr	0.00	0.00	0.00	0.00	2.11	0.99
BA14	20,400 gal/min	8,760 hrs/yr	0.74	0.00	0.00	0.00	0.00	0.00
BA15	130.0 gal/min	8,760 hrs/yr	0.01	0.00	0.00	0.00	0.00	0.00
BA16	422.2 lbs/hr	2,080 hr/yr	0.30	0.00	0.00	0.00	0.00	0.00
Subtotal			7.87	176.13	40.63	4.41	9.08	1.33

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

BILL'S GAMBLIN' HALL & SALOON

Table IV-B-13: Summary of EU – Bill's Gamblin' Hall & Saloon

EU	Description	SCC	Type ¹
BH01	Detroit Diesel Emergency Generator, M/N: 70837305, S/N: 8VA397721, 369 hp, 275 kW	20200102	---
BH02	Detroit Diesel Emergency Generator, M/N: 70837305, S/N: 8VA370148, 336 hp, 250 kW	20200102	---
BH03	Ajax Natural Gas Boiler, M/N: WGOFD-4250, S/N: 80-33079, 4.25 MMBtu/hr	10300603	---
BH04	Ajax Natural Gas Boiler, M/N: WGOFD-2500, S/N: 78-31124, 2.50 MMBtu/hr	10300603	---
BH05	Marley Cooling Tower, M/N: NC5201GS-99, S/N: 143430-001, 3,000 ppm TDS, 1,209 gpm, 0.005% drift	38500101	P1
BH07	Baltimore Aircoil Cooling Tower, M/N: 3240A, S/N: U052297001, 3,000 ppm TDS, 660 gpm, 0.005% drift	38500101	---

¹Billing Codes: P1 = Process equipment.

Table IV-B-14: Categorically Exempt EU – Bill's Gamblin' Hall & Saloon

Categorically Exempt Units	
AO Smith Boiler, Natural Gas, 0.960 MMBtu/hr, M/N: DW960, S/N: 4118	
AO Smith Boiler, Natural Gas, 0.960 MMBtu/hr, M/N: DW960, S/N: 4604	
AO Smith Boiler, Natural Gas, 0.960 MMBtu/hr, M/N: DW960S126.0, S/N: H0613496	
AO Smith Boiler, Natural Gas, 0.660 MMBtu/hr, M/N: HW670974, S/N: D04024.005	
Diesel underground storage tank, 5000 gallons	

Table IV-B-15: PTE (tons per year) – 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

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
BH03	4.25 MMBtu/hr	8,760 hr/yr	0.14	1.82	1.53	0.01	0.10	0.04
BH04	2.5 MMBtu/hr	8,760 hr/yr	0.08	1.07	0.90	0.01	0.06	0.02
BH05	1,209 gal/min	8,760 hr/yr	0.19	0.00	0.00	0.00	0.00	0.00
BH07	660 gal/min	8,760 hr/yr	0.10	0.00	0.00	0.00	0.00	0.00
Subtotal			0.55	3.46	2.55	0.06	0.20	0.08

Table IV-B-16: PTE (pounds per hour) – Bill's Gamblin' Hall & Saloon

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
BH01	369 hp	1.0 hr/day	0.81	11.44	2.46	0.76	0.93	0.02
BH02	336 hp	1.0 hr/day	0.74	10.42	2.24	0.69	0.84	0.02
BH03	4.25 MMBtu/hr	24.0 hrs/day	0.03	0.42	0.35	0.01	0.02	0.01
BH04	2.5 MMBtu	24.0 hrs/day	0.02	0.25	0.21	0.01	0.01	0.01
BH05	1,209 gal/min	24.0 hrs/day	0.04	0.00	0.00	0.00	0.00	0.00
BH07	660 gal/min	24.0 hrs/day	0.02	0.00	0.00	0.00	0.00	0.00
Subtotal			1.66	22.53	5.26	1.47	1.80	0.06

CAESAR'S PALACE

Table IV-B-17: Summary of EU – Caesar's Palace

EU	Description	SCC	Type ¹
CP01	Hurst Boiler, 35.40 MMBtu/hr, M/N: NA, S/N: S4000-150-18	10300602	F1
CP02	Hurst Boiler, 35.40 MMBtu/hr, M/N: NA, S/N: S4000-150-19	10300602	F1
CP03	Burnham Boiler, 33.475 MMBtu/hr, M/N: 3P80050GBNM, S/N: 12524	10300602	F1
CP04	Burnham Boiler, 33.475 MMBtu/hr, M/N: 3P80050GBNM, S/N: 12164	10300602	F1
CP05	Burnham Boiler, 33.475 MMBtu/hr, M/N: 3P80050GBNM, S/N: 12238	10300602	F1
CP06	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.01	10300603	---
CP07	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.02	10300603	---
CP08	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.03	10300603	---
CP10	Gasmaster Boiler, 1.0 MMBtu/hr, M/N: GMI1 ML, S/N: 221.05	10300603	---
CP13	Caterpillar Emergency Diesel Generator, M/N: 3516B, S/N: 6HN00155, 2,145 kW, 2,876 hp	20100102	EE2
CP14	Caterpillar Emergency Diesel Generator, M/N: 3516B, S/N: 6HN00154, 2,145 kW, 2,876 hp	20100102	EE2
CP15	Caterpillar Emergency Diesel Generator, M/N: 3516, S/N: 25Z05223, 1,879 kW, 2,520 hp	20100102	EE2
CP16	Caterpillar Emergency Diesel Generator, M/N: 3512, S/N: 24Z06413, 1,356 kW, 1,818 hp	20100102	EE2
CP17	Caterpillar Emergency Diesel Generator, M/N: 3516B, S/N: 6HN00199, 2,145 kW, 2,876 hp	20100102	EE2
CP18	Caterpillar Emergency Diesel Fire Pump, M/N: 3406B, S/N: 6TB04881, 321 kW, 430 hp	20300101	---
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	38500101	P1
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	38500101	P1
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	38500101	P1

EU	Description	SCC	Type ¹
CP20	Baltimore Aircoil Cooling Tower, M/N: 3725A3, S/N:U040665201MAD, 5,750 gpm, 2,700 ppm TDS, 0.005% Drift Loss	38500101	P1
CP21	Baltimore Aircoil Cooling Tower, M/N: 3725A3, S/N:U040665202MAD, 5,750 gpm, 2,700 ppm TDS, 0.005% Drift Loss	38500101	P1
CP22	Baltimore Aircoil Cooling Tower, M/N: 3725A3, S/N:U040665203MAD, 5,750 gpm, 2,700 ppm TDS, 0.005% Drift Loss	38500101	P1
CP23	Spray King Spray Paint Booth, M/N: 200-P, S/N: N/A, 24.0' x 14' x 8'	40200101	SC1
CP24	RBI Futera Boiler, 1.5 MMBtu/hr, M/N: FW1500N0, S/N: 120644885	10300603	---
CP25	RBI Futera Boiler, 1.5 MMBtu/hr, M/N: FW1500N0, S/N: 120644886	10300603	---
CP26	Unilux Boiler, 24.0 MMBtu/hr, M/N: ZF2500W-1-300/400, S/N: A1683	10300603	F1
CP27	Unilux Boiler, 24.0 MMBtu/hr, M/N: ZF2500W-1-300/400, S/N: A1684	10300603	F1
CP28	Caterpillar Emergency Diesel Generator, M/N: 3516CDITA, S/N: SBJ00672, 2,710 kW, 3,634 hp	20100102	EE2
CP29	Caterpillar Emergency Diesel Generator, M/N: 3516CDITA, S/N: SBJ00673, 2,710 kW, 3,634 hp	20100102	EE2
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	38500101	P1
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	38500101	P1
CP32	1,000-gallon, ConVault aboveground gasoline storage tank	40600306	T2
CP33	Pollution International Dust Collector, 10 hp, M/N: 33N375	30700808	---
CP34	Clarke Diesel Fire Pump, 525 hp (392 kW), M/N: JX6H-UF60, S/N: RG6125H06331	20100102	EE1
CP35	Clarke Diesel Fire Pump, 525 hp (392 kW), M/N: JX6H-UF60, S/N: RG6125H063339	20100102	EE1

¹Type codes for billing: F1 = Fuel burning equipment; EE1 = Stationary emergency IC engine 500 - 1,500 hp; EE2 = Stationary emergency IC engine ≥1,501 hp; P1 = Process equipment; T2 = Gasoline dispensing tank.

Table IV-B-18: Categorically Exempt EU – Caesar's Palace

Emission Unit Description
Pentair Pool Heater, MasterTemp MT400NAASME, 0.4 MMBtu/hr, M/N: 4607755, S/N: 07W037
Pentair Pool Heater, MasterTemp MT400NAASME, 0.4 MMBtu/hr, M/N: 4607755, S/N: 07W327
Raypak Versa Plus 155 Boiler, 0.40 MMBtu/hr (EU: CP11)
Raypak Versa Plus 155 Boiler, 0.40 MMBtu/hr (EU: CP12)
Diesel aboveground storage tank, 2,000 gallons
Diesel aboveground storage tank, 2,000 gallons
Diesel aboveground storage tank, 2,000 gallons
Diesel aboveground storage tank, 1,850 gallons
Diesel aboveground storage tank, 1,350 gallons
Diesel aboveground storage tank, 500 gallons

Table IV-B-19: PTE (tons per year) – Caesar's Palace

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
CP01 ¹	35.4 MMBtu/hr	All units 33,520 hr/yr annual cap; maximum 8,760 hr/yr per unit	4.34	20.65	4.27	0.35	3.12	1.10
CP02 ¹	35.4 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	8,760 hr/yr	0.03	0.07	0.25	0.01	0.02	0.01
CP07	1.0 MMBtu/hr	8,760 hr/yr	0.03	0.07	0.25	0.01	0.02	0.01
CP08	1.0 MMBtu/hr	8,760 hr/yr	0.03	0.07	0.25	0.01	0.02	0.01
CP10	1.0 MMBtu/hr	8,760 hr/yr	0.03	0.07	0.25	0.01	0.02	0.01

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
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
CP19a	9,000 gal/min	8,760 hr/yr	1.39	0.00	0.00	0.00	0.00	0.00
CP19b	9,000 gal/min	8,760 hr/yr	1.39	0.00	0.00	0.00	0.00	0.00
CP19c	9,000 gal/min	8,760 hr/yr	1.39	0.00	0.00	0.00	0.00	0.00
CP20	5,750 gal/min	8,760 hr/yr	0.80	0.00	0.00	0.00	0.00	0.00
CP21	5,750 gal/min	8,760 hr/yr	0.80	0.00	0.00	0.00	0.00	0.00
CP22	5,750 gal/min	8,760 hr/yr	0.80	0.00	0.00	0.00	0.00	0.00
CP23	6.4 lbs/gal VOC	624.0 gal/yr	0.00	0.00	0.00	0.00	2.00	0.94
CP24	1.50 MMBtu/hr	8,760 hr/yr	0.05	0.08	0.24	0.01	0.04	0.01
CP25	1.50 MMBtu/hr	8,760 hr/yr	0.05	0.08	0.24	0.01	0.04	0.01
CP26	24.0 MMBtu/hr	8,760 hr/yr	0.79	1.16	3.90	0.06	0.57	0.20
CP27	24.0 MMBtu/hr	8,760 hr/yr	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	0.01
CP29	3,634 hp, 2,710 kW	52.0 hr/yr	0.01	1.35	0.11	0.04	0.04	0.01
CP30a	5,600 gal/min	8,760 hr/yr	0.23	0.00	0.00	0.00	0.00	0.00
CP30b	5,600 gal/min	8,760 hr/yr	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	52.0 hr/yr	0.01	0.14	0.01	0.03	0.01	0.01
CP35	525 hp, 392 kW	52.0 hr/yr	0.01	0.14	0.01	0.03	0.01	0.01
Subtotal			13.93	32.23	15.11	0.78	6.74	2.64

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 year operating 35.4 MMBtu/hr boilers and 16,000 hours per year operating 33.475 MMBtu/hr boilers.

Table IV-B-20: PTE (pounds per hour) – Caesar's Palace

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
CP01 ¹	35.4 MMBtu/hr	All units 33,520 hr/yr annual cap; maximum 8,760 hr/yr per unit	0.27	1.24	0.26	0.02	0.19	0.07
CP02 ¹	35.4 MMBtu/hr		0.27	1.24	0.26	0.02	0.19	0.07
CP03 ¹	33.475 MMBtu/hr		0.25	1.23	0.25	0.02	0.18	0.06
CP04 ¹	33.475 MMBtu/hr		0.25	1.23	0.25	0.02	0.18	0.06
CP05 ¹	33.475 MMBtu/hr		0.25	1.23	0.25	0.02	0.18	0.06
CP06	1.0 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.06	0.01	0.01	0.01
CP07	1.0 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.06	0.01	0.01	0.01
CP08	1.0 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.06	0.01	0.01	0.01
CP10	1.0 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.06	0.01	0.01	0.01
CP13	2,876 hp, 2,145 kW	36.0 hr/yr	2.01	69.02	15.82	1.16	2.03	0.09
CP14	2,876 hp, 2,145 kW	36.0 hr/yr	2.01	69.02	15.82	1.16	2.03	0.09
CP15	2,520 hp, 1,879 kW	36.0 hr/yr	1.76	60.48	13.86	1.02	1.78	0.08
CP16	1,818 hp, 1,356 kW	36.0 hr/yr	1.27	43.63	10.00	0.74	1.28	0.06
CP17	2,876 hp, 2,145 kW	36.0 hr/yr	2.01	69.02	15.82	1.16	2.03	0.09
CP18	430 hp, 321 kW	36.0 hr/yr	0.95	13.33	2.87	0.88	1.08	0.02
CP19a	9,000 gal/min	8,760 hr/yr	0.15	0.00	0.00	0.00	0.00	0.00
CP19b	9,000 gal/min	8,760 hr/yr	0.15	0.00	0.00	0.00	0.00	0.00
CP19c	9,000 gal/min	8,760 hr/yr	0.15	0.00	0.00	0.00	0.00	0.00
CP20	5,750 gal/min	8,760 hr/yr	0.18	0.00	0.00	0.00	0.00	0.00

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
CP21	5,750 gal/min	8,760 hr/yr	0.18	0.00	0.00	0.00	0.00	0.00
CP22	5,750 gal/min	8,760 hr/yr	0.18	0.00	0.00	0.00	0.00	0.00
CP23	6.4 lbs/gal VOC	624.0 gal/yr	0.00	0.00	0.00	0.00	1.92	0.90
CP24	1.50 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.06	0.01	0.01	0.01
CP25	1.50 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.06	0.01	0.01	0.01
CP26	24.0 MMBtu/hr	8,760 hr/yr	0.18	0.26	0.89	0.01	0.13	0.05
CP27	24.0 MMBtu/hr	8,760 hr/yr	0.18	0.26	0.89	0.01	0.13	0.05
CP28	3,634 hp, 2,937 kW	52.0 hr/yr	0.32	51.84	4.25	1.44	1.36	0.11
CP29	3,634 hp, 2,937 kW	52.0 hr/yr	0.32	51.84	4.25	1.44	1.36	0.11
CP30a	5,600 gal/min	8,760 hr/yr	0.05	0.00	0.00	0.00	0.00	0.00
CP30b	5,600 gal/min	8,760 hr/yr	0.05	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	0.01	0.01
CP33	10 hp	2,980 hr/yr	0.51	0.00	0.00	0.00	0.00	0.00
CP34	525 hp, 392 kW	52.0 hr/yr	0.08	5.41	0.34	1.08	0.15	0.02
CP35	525 hp, 392 kW	52.0 hr/yr	0.08	5.41	0.34	1.08	0.15	0.02
Subtotal			14.12	445.81	86.78	11.34	16.42	2.08

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.

PARIS CASINO RESORT

Table IV-B-21: Summary of EU – Paris Casino Resort

EU	Description	SCC	Type ¹
PA01	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ06-98-8553, #1	10300603	F1
PA03	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8599, #3	10300603	---
PA04	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8606, #4	10300603	---
PA06	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8597, #6	10300603	---
PA09	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8611, #WH 1	10300603	---
PA10	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8609, #WH 2	10300603	---
PA11	Patterson-Kelley Water Heater, 1.90 MMBtu/hr, M/N: D1900, S/N: CJ08-98-8608, #WH 3	10300603	---
PA12	Bryan Boiler, 3.5 MMBtu/hr, M/N: RV350S-150-FDG-LX, S/N: 81362, #4	10300603	---
PA13	Bryan Boiler, 3.5 MMBtu/hr, M/N: RV350S-150-FDG-LX, S/N: 81349, #5	10300603	---
PA14	Bryan Boiler, 17.0 MMBtu/hr, M/N: RW1700W-FDG-LX, S/N: 81458, #3	10300602	F1
PA15	Bryan Boiler, 21.0 MMBtu/hr, M/N: RW2100W-FDG-LX, S/N: 81444, #1	10300602	F1
PA16	Bryan Boiler, 21.0 MMBtu/hr, M/N: RW2100W-FDG-LX, S/N: 81457, #2	10300602	F1
PA17	Cummins Emergency Diesel Generator, M/N: CW73-G, S/N: 74753-1, 2,100kW, 2,816 hp, #1	20100102	EE2
PA18	Cummins Emergency Diesel Generator, M/N: CW73-G, S/N: 74739-2, 2,100kW, 2,816 hp, #2	20100102	EE2
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	38500101	P1
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	38500101	P1
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	38500101	P1

EU	Description	SCC	Type ¹
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	38500101	P1
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	38500101	P1
PA24	Spray Systems Inc. Paint Booth, M/N: I-887, S/N: N/A, (7'7"x7'9"x10'2")	40200101	SC1
PA25	Dust Collector, Donaldson Torit DCE Unimaster, M/N: UMA358K11AD, S/N: 97-1572	30700808	---
PA26	RBI Futera Fusion Boiler, 2.0 MMBtu/hr, M/N: CW2000N0, S/N: 020745337	10300603	---
PA27	RBI Futera Fusion Boiler, 2.0 MMBtu/hr, M/N: CW2000N0, S/N: 020745338	10300603	---

¹Type codes for billing: F1 = Fuel burning equipment; EE2 = Stationary emergency IC engine ≥1,501 hp; P1 = Process equipment.

Table IV-B-22: Categorically Exempt EU – Paris Casino Resort

Categorically Exempt Units
AO Smith Master Fit Boiler, Natural Gas, 0.399 MMBtu/hr, M/N: BTR400A-110, S/N: LJ02-1950082110
AO Smith Master Fit Boiler, Natural Gas, 0.399 MMBtu/hr, M/N: BTR400A-110, S/N: LJ02-1950085110
One State Sandblaster Boiler, Natural Gas, 0.199 MMBtu/hr, M/N: SBD100199NES, S/N: D06M000271
Diesel underground storage tank, 6,000 gallons

Table IV-B-23: PTE (tons per year) – 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 hr/yr annual cap; maximum 7,000 hr/yr per unit	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	8,760 hr/yr	0.11	0.48	1.27	0.01	0.08	0.03
PA13	3.5 MMBtu/hr	8,760 hr/yr	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	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	8,760 hr/yr	0.73	0.00	0.00	0.00	0.00	0.00
PA20	4,725 gal/min	8,760 hr/yr	0.73	0.00	0.00	0.00	0.00	0.00
PA21	4,725 gal/min	8,760 hr/yr	0.73	0.00	0.00	0.00	0.00	0.00
PA22	4,725 gal/min	8,760 hr/yr	0.73	0.00	0.00	0.00	0.00	0.00
PA23	4,725 gal/min	8,760 hr/yr	0.73	0.00	0.00	0.00	0.00	0.00
PA24	4.32 lbs/gal VOC	384.0 gal/yr	0.00	0.00	0.00	0.00	0.83	0.39
PA25	3,000 cfm	2,080 hr/yr	0.53	0.00	0.00	0.00	0.00	0.00
PA26	1.999 MMBtu/hr	8,760 hr/yr	0.07	0.11	0.32	0.01	0.05	0.01
PA27	1.999 MMBtu/hr	8,760 hr/yr	0.07	0.11	0.32	0.01	0.05	0.02
Subtotal			5.44	8.91	12.98	0.16	1.77	0.71

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.

Table IV-B-24: PTE (pounds per hour) – 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 hr/yr annual cap; maximum 7,000 hr/yr per unit	0.01	0.09	0.16	0.01	0.01	0.01
PA03 ¹	1.90 MMBtu/hr		0.01	0.09	0.16	0.01	0.01	0.01
PA04 ¹	1.90 MMBtu/hr		0.01	0.09	0.16	0.01	0.01	0.01
PA06 ¹	1.90 MMBtu/hr		0.01	0.09	0.16	0.01	0.01	0.01
PA09 ¹	1.90 MMBtu/hr		0.01	0.09	0.16	0.01	0.01	0.01
PA10 ¹	1.90 MMBtu/hr		0.01	0.09	0.16	0.01	0.01	0.01
PA11 ¹	1.90 MMBtu/hr		0.01	0.09	0.16	0.01	0.01	0.01
PA12	3.5 MMBtu/hr	8,760 hr/yr	0.03	0.11	0.29	0.01	0.02	0.01
PA13	3.5 MMBtu/hr	8,760 hr/yr	0.03	0.11	0.29	0.01	0.02	0.01
PA14	17.0 MMBtu/hr	4,380 hr/yr	0.13	0.62	1.44	0.01	0.09	0.03
PA15 ²	21.0 MMBtu/hr	4,380 hr/yr	0.16	0.77	1.78	0.01	0.11	0.04
PA16 ²	21.0 MMBtu/hr		0.16	0.77	1.78	0.01	0.11	0.04
PA17	2,816 hp, 2,100 kW	52.0 hr/yr	1.97	67.58	15.49	1.14	1.99	0.09
PA18	2,816 hp, 2,100 kW	52.0 hr/yr	1.97	67.58	15.49	1.14	1.99	0.09
PA19	4,725 gal/min	8,760 hr/yr	0.12	0.00	0.00	0.00	0.00	0.00
PA20	4,725 gal/min	8,760 hr/yr	0.12	0.00	0.00	0.00	0.00	0.00
PA21	4,725 gal/min	8,760 hr/yr	0.12	0.00	0.00	0.00	0.00	0.00
PA22	4,725 gal/min	8,760 hr/yr	0.12	0.00	0.00	0.00	0.00	0.00
PA23	4,725 gal/min	8,760 hr/yr	0.12	0.00	0.00	0.00	0.00	0.00
PA24	4.32 lbs/gal VOC	384.0 gal/yr	0.00	0.00	0.00	0.00	0.79	0.37
PA25	3,000 cfm	2,080 hr/yr	0.53	0.00	0.00	0.00	0.00	0.00
PA26	1.999 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.07	0.01	0.01	0.01
PA27	1.999 MMBtu/hr	8,760 hr/yr	0.01	0.02	0.07	0.01	0.01	0.01
Subtotal			5.67	138.21	37.82	2.42	5.21	0.77

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.

IMPERIAL PALACE

Table IV-B-25: Summary of EU – Imperial Palace

EU	Description	SCC	Type ¹
IP01	Ajax Boiler, 1.25 MMBtu/hr, M/N: WG-1250 D, S/N: 82-34510	10300602	---
IP02	Ajax Boiler, 1.25 MMBtu/hr, M/N: WG-1250 D, S/N: 82-34507	10300602	---
IP03	Ajax Boiler, 1.25 MMBtu/hr, M/N: WG-1250 D, S/N: 82-34502	10300602	---
IP04	Kewanee Boiler, 16.70 MMBtu/hr, M/N: H3S 4000HP, S/N: R8190	10300603	F1
IP05	Kewanee Boiler, 16.70 MMBtu/hr, M/N: H3S 4000GO, S/N: R8191	10300603	F1
IP06	Caterpillar Emergency Diesel Generator, M/N: 3412, S/N: 81Z01351, 507 kW, 680 hp	20200102	EE1
IP07	Caterpillar Emergency Diesel Generator, M/N: 3412, S/N: 81Z04033, 563 kW, 755 hp	20200102	EE1
IP08	Caterpillar Emergency Diesel Generator, M/N: 3412, S/N: 81Z07511, 664 kW, 890 hp	20200102	EE1
IP09	Caterpillar Emergency Diesel Generator, M/N: 3412, S/N: 81Z08595, 664 kW, 890 hp	20200102	EE1
IP10	Detroit Diesel Emergency Generator, M/N: 7083-7305, S/N: 263120414, 280 kW, 375 hp	20200102	---
IP11	Detroit Diesel Emergency Generator, M/N: 580FDF, S/N: JB95613, 500 kW, 670 hp	20200102	EE1

EU	Description	SCC	Type ¹
IP15	RSD Cooling Tower, M/N: RSD-60, S/N: 96061, 200 gpm, 3,000 ppm TDS, 0.005% Drift Loss	38500101	---
IP16	RSD Cooling Tower, M/N: RSD-015, S/N: 07290, 45 gpm, 3,000 ppm TDS, 0.005% Drift Loss	38500101	---
IP17	RSD Cooling Tower, M/N: RSD-030, S/N: 4110, 90 gpm, 3,000 ppm TDS, 0.005% Drift Loss	38500101	---
IP21	Evapco Cooling Tower, M/N: ATC165, S/N: 988621W, 200 gpm, 3,000 ppm TDS, 0.001% Drift Loss	38500101	---
IP22	RSD Cooling Tower, M/N: RSD-60, S/N: 88201, 150 gpm, 3,000 ppm TDS, 0.005% Drift Loss	38500101	---
IP24	Evapco Cooling Tower, M/N: AT19311, S/N: W016698, 444 gpm, 3,000 ppm TDS, 0.001% Drift Loss	38500101	---
IP25	RSD Cooling Tower, M/N: RSD-30-RT, S/N: 89251, 100 gpm, 3,000 ppm TDS, 0.005% Drift Loss	38500101	---
IP26	Spray Paint Booth (21'x 50')	40200101	SC1
IP28	Heidelberg Printing Press, M/N: SORM, S/N: 503739	40500212	---
IP29	Heidelberg Printing Press, M/N: H222, S/N: 71498	40500212	---
IP30	ATF Chief Printing Press, M/N: 2.17, S/N: 219-7857	40500212	---
IP31	ATF Chief Printing Press, M/N: 2.17, S/N: 222-9102	40500212	---
IP32	Evapco Cooling Tower, M/N: ATC165B, S/N: 5123770, 300 gpm, 3,000 ppm TDS, 0.001% Drift Loss	38500101	---
IP33	Evapco Cooling Tower, M/N: ATC165B, S/N: 5123771, 300 gpm, 3,000 ppm TDS, 0.001% Drift Loss	38500101	---
IP34	Air Sentry, Inc. Dust Collector; M/N: 205055CP; S/N: 1216	30700808	---
IP35	Evapco Cooling Tower, M/N: ATC-165B, S/N: 8349770, 270 gpm, 3,000 ppm TDS, 0.001% Drift Loss	38500101	---

¹Type codes for billing: F1 = Fuel burning equipment; EE1 = Stationary emergency IC engine 500 through 1,500 hp; P1 = Process equipment; PP1 = Stationary printing press.

Table IV-B-26: Categorically Exempt EU – Imperial Palace

Emission Unit Description
Diesel aboveground storage tank, 200 gallons
Diesel aboveground storage tank, 275 gallons
Diesel aboveground storage tank, 275 gallons
Diesel aboveground storage tank, 300 gallons
Diesel aboveground storage tank, 400 gallons
Diesel aboveground storage tank, 650 gallons

Table IV-B-27: PTE (tons per year) – Imperial Palace

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
IP01 ¹	1.25 MMBtu/hr	15,000 hr/yr	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	8,760 hr/yr	0.55	3.58	5.43	0.04	0.39	0.14
IP05	16.70 MMBtu/hr	8,760 hr/yr	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
IP12	1,205 gal/min	8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
IP13	1,104 gal/min	8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
IP14	1,104 gal/min	8,760 hr/yr	0.07	0.00	0.00	0.00	0.00	0.00
IP15	200.0 gal/min	8,760 hr/yr	0.03	0.00	0.00	0.00	0.00	0.00
IP16	45.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP17	90.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP18	440.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP21	200.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP22	150.0 gal/min	8,760 hr/yr	0.02	0.00	0.00	0.00	0.00	0.00
IP23	192.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP24	444.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP25	100.0 gal/min	8,760 hr/yr	0.02	0.00	0.00	0.00	0.00	0.00
IP26	1.75 lbs/gal VOC	1,292 gal/yr	0.00	0.00	0.00	0.00	1.13	0.53
IP27 ²	4.33 lbs/gal VOC	1,071 gal/yr	0.00	0.00	0.00	0.00	2.31	1.09
IP28 ²								
IP29 ²								
IP30 ²								
IP31 ²								
IP32	300.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP33	300.0 gal/min	8,760 hr/yr	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	270.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
Subtotal			2.09	10.35	12.27	0.16	4.36	1.98

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 presses (IP27, IP28, IP29, IP30, and IP31) have combined limitations as indicated in the Table above.

Table IV-B-28: PTE (pounds per hour) – Imperial Palace

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
IP01 ¹	1.25 MMBtu/hr	15,000 hr/yr	0.01	0.06	0.10	0.01	0.01	0.01
IP02 ¹	1.25 MMBtu/hr		0.01	0.06	0.10	0.01	0.01	0.01
IP03 ¹	1.25 MMBtu/hr		0.01	0.06	0.10	0.01	0.01	0.01
IP04	16.70 MMBtu/hr	8,760 hr/yr	0.13	0.82	1.24	0.01	0.09	0.03
IP05	16.70 MMBtu/hr	8,760 hr/yr	0.13	0.82	1.24	0.01	0.09	0.03
IP06	680 hp, 507 kW	52.0 hr/yr	0.48	16.32	3.74	0.28	0.48	0.02
IP07	755 hp, 563 kW	52.0 hr/yr	0.53	18.12	4.15	0.31	0.53	0.02
IP08	890 hp, 664 kW	52.0 hr/yr	0.62	21.36	4.90	0.38	0.63	0.03
IP09	890 hp, 664 kW	52.0 hr/yr	0.62	21.36	4.90	0.38	0.63	0.03
IP10	375 hp, 280 kW	52.0hr/yr	0.83	11.63	2.51	0.77	0.94	0.02
IP11	670 hp, 500 kW	52.0 hr/yr	0.47	16.08	3.69	0.27	0.47	0.02
IP12	1,205 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP13	1,104 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP14	1,104 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP15	200.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP16	45.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP17	90.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP18	440.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP21	200.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP22	150.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP23	192.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP24	444.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP25	100.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
IP26	1.75 lbs/gal VOC	1,292 gal/yr	0.00	0.00	0.00	0.00	1.08	0.51
IP27 ²	4.33 lbs/gal VOC	1,071 gal/yr	0.00	0.00	0.00	0.00	0.64	0.30
IP28 ²								
IP29 ²								
IP30 ²								
IP31 ²								
IP32	300.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP33	300.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
IP34	2,600 cfm	2,080 hr/yr	0.45	0.00	0.00	0.00	0.00	0.00
IP35	270.0 gal/min	8,760 hr/yr	0.01	0.00	0.00	0.00	0.00	0.00
Subtotal			4.44	106.69	26.67	2.40	5.62	1.04

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

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

Table IV-B-29: Source Total PTE (tons per year)

Facility	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Harrah's Las Vegas	4.71	5.57	5.87	0.20	2.71	1.50
Flamingo Las Vegas	5.87	15.65	13.65	0.27	3.92	1.66
Bally's Las Vegas	4.73	7.33	3.04	0.17	3.06	1.38
Bill's Gamblin' Hall & Saloon	0.55	3.46	2.55	0.06	0.20	0.08
Caesar's Palace	13.93	32.23	15.11	0.78	6.74	2.64
Paris Casino Resort	5.44	8.91	12.98	0.16	1.77	0.71
Imperial Palace	2.09	10.35	12.27	0.16	4.36	1.98
Total	37.32	83.50	65.47	1.80	22.76	9.95

Table IV-B-30: Source Total PTE (pounds per hour)

Facility	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Harrah's Las Vegas	8.95	150.96	35.03	6.09	8.65	0.45
Flamingo Las Vegas	7.40	156.89	37.82	4.14	8.58	1.33
Bally's Las Vegas	7.87	176.13	40.63	4.41	9.08	1.33
Bill's Gamblin' Hall & Saloon	1.66	22.53	5.26	1.47	1.80	0.06
Caesar's Palace	14.12	445.81	86.78	11.34	16.42	2.08
Paris Casino Resort	5.67	138.21	37.82	2.42	5.21	0.77
Imperial Palace	4.44	106.69	26.67	2.40	5.62	1.04
Total	50.11	1197.22	270.01	32.27	55.36	7.06

The units or activities listed in Table VI-B-31 of this document are present at this source, but are categorically exempt pursuant to AQR Section 12. The emissions from these units or activities, when added to the PTE of the source, do not contribute to making the source major for any pollutant for which it is not already major (i.e., NO_x).

Table IV-B-31: Summary of Categorically Exempt EU or Activities

Emission Unit Description	Facility
Raypak Pool Heater, 0.726 MMBtu/hr (EU: HA22)	Harrah's Las Vegas
Diesel aboveground storage tank, 2,933 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 1,000 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 25 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 25 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 25 gallons	Harrah's Las Vegas

Emission Unit Description	Facility
Diesel aboveground storage tank, 25 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 50 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 50 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 266 gallons	Harrah's Las Vegas
Diesel aboveground storage tank, 572 gallons	Harrah's Las Vegas
Diesel underground storage tank, 8,000 gallons	Flamingo Las Vegas
Diesel underground storage tank, 2,500 gallons	Flamingo Las Vegas
Diesel underground storage tank, 1,000 gallons	Flamingo Las Vegas
Diesel aboveground storage tank, 12,100 gallons	Bally's Las Vegas
Diesel underground storage tank, 2,000 gallons	Bally's Las Vegas
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S	Bally's Las Vegas
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S	Bally's Las Vegas
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S	Bally's Las Vegas
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S	Bally's Las Vegas
Cincinnati Fan and Ventilator Company, Inc., Dust Master Model 100S	Bally's Las Vegas
AO Smith Boiler, Natural Gas, 0.960 MMBtu/hr, M/N: DW960, S/N: 4118	Bill's Gamblin' Hall & Saloon
AO Smith Boiler, Natural Gas, 0.960 MMBtu/hr, M/N: DW960, S/N: 4604	Bill's Gamblin' Hall & Saloon
AO Smith Boiler, Natural Gas, 0.960 MMBtu/hr, M/N: DW960S126, S/N: H0613496	Bill's Gamblin' Hall & Saloon
AO Smith Boiler, Natural Gas, 0.660 MMBtu/hr, M/N: HW670974, S/N: D0402405	Bill's Gamblin' Hall & Saloon
Diesel underground storage tank, 6,000 gallons	Bill's Gamblin' Hall & Saloon
Pentair Pool Heater, MasterTemp MT400NAASME, 0.4 MMBtu/hr, M/N: 4607755, S/N: 07W037	Caesar's Palace
Pentair Pool Heater, MasterTemp MT400NAASME, 0.4 MMBtu/hr, M/N: 4607755, S/N: 08W327	Caesar's Palace
Diesel aboveground storage tank, 2,000 gallons	Caesar's Palace
Diesel aboveground storage tank, 2,000 gallons	Caesar's Palace
Diesel aboveground storage tank, 2,000 gallons	Caesar's Palace
Diesel aboveground storage tank, 1,850 gallons	Caesar's Palace
Diesel aboveground storage tank, 1,350 gallons	Caesar's Palace
Diesel aboveground storage tank, 500 gallons	Caesar's Palace
AO Smith Master Fit Boiler, Natural Gas, 0.399 MMBtu/hr, M/N: BTR400A-110, S/N: LJ02-1950082110	Paris Casino Resort
AO Smith Master Fit Boiler, Natural Gas, 0.399 MMBtu/hr, M/N: BTR400A-110, S/N: LJ02-1950085110	Paris Casino Resort
One State Sandblaster Boiler, Natural Gas, 0.199 MMBtu/hr, M/N: SBD100199NES, S/N: D06M000271	Paris Casino Resort
Diesel underground storage tank, 6,000 gallons	Paris Casino Resort
Diesel aboveground storage tank, 200 gallons	Imperial Palace
Diesel aboveground storage tank, 275 gallons	Imperial Palace
Diesel aboveground storage tank, 275 gallons	Imperial Palace
Diesel aboveground storage tank, 300 gallons	Imperial Palace
Diesel aboveground storage tank, 400 gallons	Imperial Palace
Diesel aboveground storage tank, 650 gallons	Imperial Palace

C. Testing

Performance testing applies to emission units FL01, FL02, FL03, FL04, BA01, BA02, BA03, CP01, CP02, CP03, CP04, CP05, CP26, CP27, PA14, PA15, PA16, IP04, and IP05. The Permittee shall conduct performance testing on boilers according to the following conditions:

1. 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 Section II of this ATC/OP for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr.
2. The owner/operator shall submit for approval a performance testing protocol which contains test, reporting, and notification schedules, test protocols, and anticipated test dates to the DAQEM Compliance Reporting Supervisor and to the Enforcement Office of the US EPA, Region IX, at least 45 days prior to the anticipated test date but not more than 90 days prior to the anticipated test date.
3. A report describing the results of the performance test shall be submitted to the DAQEM Compliance Reporting Supervisor and to the Enforcement Office of the US EPA, Region IX, within 60 days from the end of the performance test.
4. 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, FL04, BA01, BA02, BA03, CP01, CP02, CP03, CP04, CP05, CP 26, CP27, PA14, PA15, PA16, IP04, and IP05.
5. Pursuant to AQR Section 10 (as revised), the owner/operator of any stationary source or emissions unit that fails to demonstrate compliance with the emissions standards or limitations during any subsequent performance test shall submit a compliance plan to DAQEM Compliance Reporting Supervisor within 90 days from the end of the performance test.
6. Pursuant to AQR Subsection 4.5 (as revised), additional performance testing may be required by the Control Officer.

Table IV-C-1: 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
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.

7. 40 CFR Part 60 Subpart Dc are applicable to emission units FL01, FL02, FL03, FL04, BA01, BA02, BA03, CP01, CP02, CP03, CP04, CP05, CP26, CP27, PA14, PA15, PA16, IP04, and IP05.
8. AQR Section 49 (as revised) is applicable to emission units HA06, HA07, HA11, FL01, FL05, BA01, BA02, BA03, BH03, CP01, CP02, CP03, CP04, CP05, CP26, CP27, PA14, PA15, and PA16.
9. The following general performance testing requirements of the Phase I apply to the source:
 - a. Each performance tests shall be conducted in accordance with the applicable CARB Test Procedure that is required by the CARB EO.
 - b. The source shall give a 7-day written prior notice of the date of the test to the Compliance Reporting Supervisor, DAQEM.

- c. Any prior approved scheduled performance test cannot be canceled and/or rescheduled except with the prior approval of the Compliance Reporting Supervisor, DAQEM.
- d. 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 Compliance Reporting Supervisor, DAQEM.
- e. The report shall have, as the first page of text, a signed Certification of Performance Test Results (see Attached).
- f. Each performance test shall be conducted by a DAQEM approved Certified Phase II Vapor Recovery Tester, as defined in AQR Subsection 52.2.
- g. 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.
- h. 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 IV-C-2:

Table IV-C-2: 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 IV-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.

10. Initial Performance Test

- a. The source shall conduct and pass an initial performance test within 30 days of the source commencing operations.
- b. The source shall conduct and pass an initial performance test within 30 days of commencing operations of new emission units that require performance testing.
- c. The source shall conduct and pass an initial performance test within 30 days of commencing operations of modified emission units that require performance testing.
- d. The initial performance test must be witnessed by an inspector from the DAQEM.

11. Annual Performance Test: Vapor Recovery System

- a. Annual performance testing shall be accomplished prior to the anniversary date of the previous performance test that the source passed.
- b. Pursuant to AQR Section 4, the Control Officer may require additional testing.

12. The source shall implement changes to the existing vapor recovery system if any performance test results indicate such changes are necessary to maintain compliance with this ATC/OP.

V. REGULATORY REVIEW

A. Local Regulatory Requirements

DAQEM has determined that the following public law, statutes and associated regulations are applicable:

1. Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq.;
2. Title 40 of the Code of Federal Regulations (CFR);
3. Nevada Revised Statutes (NRS), Chapter 445B;
4. Portions of the AQR included in the State Implementation Plan (SIP) for Clark County, Nevada. SIP requirements are federally enforceable. All requirements from Authority to Construct permits and Section 16 Operating Permits issued by DAQEM are federally enforceable because these permits were issued pursuant to SIP-included sections of the AQR; and
5. Portions of the AQR not included in the SIP. These locally applicable requirements are locally enforceable only.

The Nevada Revised Statutes (NRS) and the Clean Air Act Amendments (CAAA) are public laws that establish the general authority for the Regulations mentioned. The DAQEM Part 70 (Title V) Program received Final Approval on November 30, 2001 with publication of that approval appearing in the Federal Register December 5, 2001 Vol. 66, No. 234. AQR Section 19 - Part 70 Operating Permits [Amended 07/01/04] details the Clark County Part 70 Operating Permit Program. These regulations may be accessed on the Internet at: <http://www.accessclarkcounty.com/depts/daqem/aq/rules/pages/regs.aspx>.

Local regulations contain sections that are federally enforceable and sections that are locally enforceable only. Locally enforceable only rules have not been approved by EPA for inclusion into the State Implementation Plan (SIP). Requirements and conditions that appear in the Part 70 OP which are related only to non-SIP rules are notated as locally enforceable only.

Table V-A-1: AQR Section 12 and 55 Summary

	PM ₁₀	NO _x	CO	SO ₂	VOC	HAP
Source PTE (tpy)	37.32	83.50	65.47	1.80	22.76	9.95
Nonmajor Source	< 70 tpy	< 50 tpy	< 70 tpy	≤ 100 tpy	< 50 tpy	If single HAP ≤ 10 tpy and all HAP ≤ 25 tpy

Discussion: HOC is a major source of NO_x.

Table V-A-2: DAQEM AQR and SIP with Source Compliance or Requirement

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
0. Definitions	applicable definitions	yes	entire source

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
1. Definitions	applicable definitions – “Affected Facility”, “Air Contaminant”, “Air Pollution Control Committee”, “Area Source”, “Atmosphere”, “Board”, “Commercial Off-Road Vehicle Racing”, “Dust”, “Existing Facility”, “Existing Gasoline HOC”, “Fixed Capital Cost”, “Fumes”, “Health District”, “Hearing Board”, “Integrated Sampling”, “Minor Source”, “Mist”, “New Gasoline HOC”, “New Source”, “NIC”, “Point Source”, “Shutdown”, “Significant”, “Single Source”, “Smoke”, “Source of Air Contaminant”, “Special Mobile Equipment”, “Standard Commercial Equipment”, “Standard Conditions”, “Start Up”, “Stop Order”, “Uncombined Water”, and “Vapor Disposal System”	yes	entire source
4. Control Officer	all subsections	yes	entire source
5. Interference with Control Officer	all subsections	yes	entire source
8. Persons Liable for Penalties - Punishment: Defense	all subsections	yes	entire source
9. Civil Penalties	all subsections	yes	entire source
10. Compliance Schedule	when applicable; applicable subsections	yes	entire source
11. Ambient Air Quality Standards	applicable subsections	yes	entire source
12. Preconstruction Review for New or Modified Stationary Sources	All subsections <u>except</u> the following: § 12.2.18 HAP sources in Clark County. § 12.2.20 Additional Requirements for stationary sources with Beryllium, Mercury, Vinyl Chloride, or Asbestos EMISSIONS in Clark County	yes	entire source
14. New Source Performance Standards	AQR Section 14.1.15: Subpart Dc Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units.	no	Applicable – emission units with design heat capacity more than 10 MMBtu/hr, but less than 100 MMBtu/hr
16. Operating Permits	all subsections	yes	entire source
18. Permit and Technical Service Fees	§ 18.1 Operating Permit Fees § 18.2 Annual Emission Unit Fees § 18.4 New Source Review Application Review Fee § 18.5 Part 70 Application Review Fee § 18.6 Annual Part 70 Emission Fee § 18.14 Billing Procedures	yes	entire source

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
19. Part 70 Operating Permit Federal Approval (11/25/01)	§ 19.2 Applicability § 19.3 Part 70 Permit Applications § 19.4 Part 70 Permit Content § 19.5 Permit Issuance, Renewal, Re-openings, and Revisions § 19.6 Permit Renewal by the EPA and Affected States § 19.7 Fee Determination and Certification	N/A	entire source
24. Sampling and Testing - Records and Reports	§ 24.1 Requirements for installation and maintenance of sampling and testing facilities § 24.2 Requirements for emissions record keeping § 24.3 Requirements for the record format § 24.4 Requirements for the retention of records by the emission sources	yes	entire source
25.1 Upset/Breakdown, Malfunctions	§ 25.1 Requirements for the excess emissions caused by upset/breakdown and malfunctions	no	entire source
25.2 Upset/Breakdown, Malfunctions	§ 25.2 Reporting and Consultation	yes	entire source
26. Emission of Visible Air Contaminants	§ 26.1 Limit on opacity (\leq 20 percent for 3 minutes in a 60-minute period)	yes	entire source
28. Fuel Burning Equipment	Emission Limitations for PM	yes	entire source
29. Sulfur Contents of Fuel Oil	Sulfur content shall be equal to or less than 0.05 percent sulfur by weight	no	All emission units using diesel fuel.
40. Prohibitions of Nuisance Conditions	§ 40.1 Prohibitions	no	entire source
41. Fugitive Dust	§ 41.1 Prohibitions	yes	entire source
42. Open Burning	§ 42.2	no	entire source
43. Odors In the Ambient Air	§ 43.1 Prohibitions coded as Section 29	no	entire source
49. Emission Standards for Boilers and Steam Generators Burning Fossil Fuels	Local enforcement only all subsections	no	entire source
55. Preconstruction Review for New or Modified Stationary Sources in the 8-hour Ozone Nonattainment Area	all subsections	no	entire source
60. Evaporation and Leakage	all subsections	yes	entire source
70. Emergency Procedures	all subsections	yes	entire source
80. Circumvention	all subsections	yes	entire source

AQR SECTION 11 - AMBIENT AIR QUALITY STANDARDS [Amended 07/01/04] (in part)

Discussion: DAQEM modeled the source using AERMOD to track the increment consumption. The boilers and generators were modeled for the NO_x and SO₂ increment consumption.

Table V-A-3: PSD Increment Consumption

Pollutant	Averaging Period	PSD Increment Consumption by the Source ($\mu\text{g}/\text{m}^3$)	Location Maximum Impact	
			UTM X (m)	UTM Y (m)
SO ₂	3-hour	95.25 ¹	664850	3998650
SO ₂	24-hour	4.90 ¹	664750	3998350
SO ₂	Annual	0.26	663850	3998550
NO ₂	Annual	12.58	663850	3998550

¹ Modeled 2nd High Concentration.

Table V-A-3 shows the location of the maximum impact and the potential PSD increment consumed by the source at that location. The impacts are below the PSD increment limits.

B. Federally Applicable Regulations

40 CFR PART 60-STANDARDS OF PERFORMANCE FOR NEW HOCARY SOURCES

Subpart A - General Provisions

40 CFR § 60.7-Notification and record keeping

Discussion: This regulation requires notification to DAQEM of modifications, opacity testing, records of malfunctions of process equipment and performance test data. The Part 70 OP reflects these requirements. DAQEM requires records to be maintained for five years, a more stringent requirement than the two (2) years required by § 60.7.

40 CFR § 60.8-Performance tests

Discussion: Notice of intent to test, the applicable test methods, acceptable test method operating conditions, and the requirement for three runs are outlined in this regulation. DAQEM requirements for initial performance testing are identical to § 60.8. DAQEM also requires periodic performance testing on emission units based upon throughput or usage. DAQEM also reserves the right to require more frequent testing. More discussion is in this document under the compliance section.

40 CFR § 60.11-Compliance with standards and maintenance requirements.

Discussion: HOC is subject to NSPS standard: Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Initial performance tests for units subject to this standard have been successfully. HOC shall operate in a manner consistent with this section of the regulation.

40 CFR § 60.12- Circumvention

Discussion: This prohibition is addressed in the Part 70 OP. This is also local rule § 80.1.

Subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR § 60.40c – Applicability and Delegation of Authority

Discussion: The boilers (EUs: FL01, FL02, FL03, FL04, BA01, BA02, BA03, CP01, CP02, CP03, CP04, CP05, CP26, CP27, PA14, PA15, PA16, IP04, and IP05) are each rated at least 10.0 MMBtu per hour; therefore, Subpart Dc is applicable to these emission units.

40 CFR § 60.42c – Standard for Sulfur Dioxide

Discussion: This section does not pertain to boilers that exclusively fire natural gas.

40 CFR § 60.43c – Standard for Particulate Matter

Discussion: This section does not pertain to boilers that exclusively fire natural gas.

40 CFR § 60.48c – Reporting and Recordkeeping Requirements

Discussion: These are addressed in the Part 70 operating permit.

VI. COMPLIANCE

A. Compliance Certification

19.3.3.9 Requirements for compliance certification:

(a) Regardless of the date of issuance of this Part 70 OP, the schedule for the submittal of reports to the Control Officer shall be as follows:

Quarter	Applicable Period	Due Date ¹	Required Contents
1	January, February, March	April 30 each year	Quarterly Report for 1 st Calendar Quarter
2	April, May, June	July 30 each year	Quarterly Report for 2 nd Calendar Quarter
3	July, August, September	October 30 each year	Quarterly Report for 3 rd Calendar Quarter
4	October, November, December	January 30 each year	Quarterly Report for 4 th Calendar Quarter and Annual Compliance Certification Report

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

- (b) A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods.
- (c) A schedule for submission of compliance certifications during the permit term.
- (d) A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements of the Act.

B. Compliance Summary

Citation	Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 0	Definitions	Applicable – HOC will comply with all applicable definitions as they apply.	HOC will meet all applicable test methods should new definitions apply.	HOC complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 4	Control Officer	Applicable – The Control Officer or his representative may enter into HOC property, with or without prior notice, at any reasonable time for purpose of establishing compliance.	HOC will allow Control Officer to enter HOC properties as required.	HOC complies with applicable requirements.
AQR Section 11	Ambient Air Quality Standards	Applicable – HOC is a source of air pollutants.	EPA-approved dispersion modeling.	HOC complies with applicable requirements.
AQR Section 12.1	General application requirements for construction of new and modified sources of air pollution	Applicable – HOC applied for and the ATC certificate was issued before commencing construction.	HOC received the ATC permit to construct.	HOC complies with applicable requirements.
AQR Section 12.2.1	Requirements for specific air pollutants: Nonmajor PM ₁₀ emission source located in the Serious Non-attainment area.	Applicable – HOC is a Nonmajor PM ₁₀ source with PM ₁₀ emission units located in Hydrographic Basin 212, which is Serious Non-attainment for PM ₁₀ .	The HOC PM ₁₀ controls meet BACT as applicable for Hydrographic Basin 212. The Part 70 permit has relevant compliance, record keeping and reporting requirements.	HOC complies with applicable control technology requirements for PM ₁₀ .
AQR Section 12.2.6	Requirements for specific air pollutants: Nonmajor CO emission source located in the Serious Non-attainment area.	Applicable – HOC is a Nonmajor CO source with CO emission units located in Hydrographic Basin 212, which is Serious Non-attainment for CO.	The HOC CO controls meet BACT as applicable for Hydrographic Basin 212. The Part 70 permit has relevant compliance, record keeping and reporting requirements.	HOC complies with applicable control technology requirements for CO.
AQR Section 55.5	Requirements for specific air pollutants: Nonmajor VOC emission source located in the 8-hour Non-attainment ozone area.	Applicable – HOC is a Nonmajor VOC source with VOC emission units located in Hydrographic Basin 212, which is an 8-hour Non-attainment area for ozone.	The HOC VOC controls meet BACT as applicable for Hydrographic Basin 212. The Part 70 permit has relevant compliance, record keeping and reporting requirements.	HOC complies with applicable control technology requirements for VOC.
AQR Section 55.4	Requirements for specific air pollutants: Major NO _x emission source located in the 8-hour Non-attainment ozone area.	Applicable – HOC is a Major NO _x source with NO _x emission units located in Hydrographic Basin 212, which is an 8-hour Non-attainment area for ozone.	The HOC NO _x controls meet BACT as applicable for Hydrographic Basin 212. The Part 70 permit has relevant compliance, record keeping and reporting requirements.	HOC complies with applicable control technology requirements for NO _x .
AQR Section 12.2.16	Requirements for specific air pollutants: SO ₂ sources located in the PSD area	Applicable – HOC has SO ₂ emission units located in Hydrographic Basin 212, which is PSD for SO ₂ .	The HOC SO ₂ controls meet BACT as applicable for Hydrographic Basin 212. The Part 70 permit has relevant compliance, record keeping and reporting requirements.	HOC complies with applicable control technology requirements and PSD increment standards for SO ₂ .
AQR Section 12.2.18	Requirements for major HAP sources in Clark County.	Not Applicable.	Not Applicable	HOC complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 12.2.19	Requirements for specific air pollutants: TCS sources in Clark County.	Not Applicable.	Not Applicable	HOC complies with applicable requirements.
AQR Section 14.1.1 Subpart A	New Source Performance Standards (NSPS) General Provisions	Applicable – HOC is an affected facility under the regulations. Section 14 is locally enforceable; however, the NSPS standards referenced are federally enforceable.	Applicable monitoring, recordkeeping and reporting requirements.	HOC complies with applicable requirements.
AQR Section 14.1.15 Subpart Dc	New Source Performance Standards – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units	Applicable – HOC has a boilers with heat input greater than 10 MMBtu/hr.	The boilers meet applicable NO _x and PM emission standards. NO _x emissions determined by EPA Method 7E and PM ₁₀ by EPA Method 201/201a and 202.	HOC complies with applicable requirements.
AQR Section 16	DAQEM Operating Permits	Applicable – Any emission unit of stationary source must apply for and obtain a DAQEM operating permit.	HOC applied for and received operating permit from DAQEM prior to commercial operation.	HOC complies with applicable requirements.
AQR Section 18	Permit and Technical Service Fees	Applicable – HOC will be required to pay all required/applicable permit and technical service fees.	HOC is required to pay all required/applicable permit and technical service fees.	HOC complies with applicable requirements.
AQR Section 19	40 CFR Part 70 Operating Permits	Applicable – HOC is a major stationary source and under Part 70 the initial Title V permit application will be submitted within 12 months of startup. Section 19 is both federally and locally enforceable	HOC has submitted the Part 70 permit within 12 months of startup.	HOC complies with applicable requirements.
AQR Section 25	Upset/Breakdown, Malfunctions	Applicable – Any upset, breakdown, emergency condition, or malfunction which causes emissions of regulated air pollutants in excess of any permit limits shall be reported to Control Officer. Section 25.1 is locally and federally enforceable.	Any upset, breakdown, emergency condition, or malfunction in which emissions exceed any permit limit shall be reported to the Control Officer within one (1) hour of onset of such event. Section 25.1 is locally and federally enforceable.	The HOC currently complies with applicable requirements.
AQR Section 26	Emissions of Visible Air Contaminants	Applicable – Opacity for the HOC combustion turbines must not exceed 20 percent for more than three (3) minutes in any 60-minute period.	Compliance determined by EPA Method 9	HOC complies with applicable requirements.
AQR Section 28	Fuel Burning Equipment	Applicable – The PM emission rate for the combustion turbines and duct burners are well below those established based on Section 28 requirements.	Maximum allowable PM emission rate determined from equation in Section 28.	HOC complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 29	Sulfur Content of Fuel Oil	Applicable – The diesel fuel that will be burned in the fire pump and emergency generator engines at the HOC will require low sulfur fuel with sulfur content less than 0.05 percent by weight. Section 29 is locally enforceable only.	Fuel sulfur content verification obtained from fuel oil supplier.	HOC complies with applicable requirements.
AQR Section 40	Prohibition of Nuisance Conditions	Applicable – 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. Section 40 is locally enforceable only.	HOC air contaminant emissions controlled by pollution control devices or good combustion in order not to cause a nuisance.	HOC complies with applicable requirements.
AQR Section 41	Fugitive Dust	Applicable – HOC shall take necessary actions to abate fugitive dust from becoming airborne.	HOC utilizes appropriate best practices to not allow airborne fugitive dust.	HOC complies with applicable requirements.
AQR Section 42	Open Burning	Applicable – In event HOC burns combustible material in any open areas, such burning activity will have been approved by Control Officer in advance. Section 42 is locally enforceable rule only.	HOC will contact the DAQEM and obtain approval in advance for applicable burning activities as identified in the rule.	HOC complies with applicable requirements.
AQR Section 43	Odors in the Ambient Air	Applicable – An odor occurrence is a violation if the Control Officer is able to detect the odor twice within a period of an hour, if the odor causes a nuisance, and if the detection of odors is separated by at least fifteen minutes. Section 43 is a locally enforceable rule only.	HOC will not operate its facility in a manner which will cause odors.	HOC complies with applicable requirements.
AQR Section 49	Emission Standards for Boilers and Steam Generators Burning Fossil Fuels	Applicable – The HOC operates boilers that are subject to performance testing and burner efficiency testing requirements.	HOC submitted required test protocols prior to initial performance testing. Tests reported within 60 days. DAQEM approves test reports.	HOC complies with applicable requirements.
AQR Section 55	Preconstruction review for New or Modified Stationary Sources in the 8-Hour Ozone Nonattainment Area	Applicable – HOC is located in Las Vegas Valley airshed (hydrographic area 212) and will need to meet the applicable emission control requirements at times of future modifications.	In the event HOC undertakes any modification, HOC will have to apply proper control technologies and meet offset requirements, as applicable.	HOC complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 52.21	Prevention of Significant Deterioration (including Preconstruction permits)	Applicable – HOC PTE > 100 TPY and is listed as one of the 28 source categories.	BACT analysis, air quality analysis using ISCST3, and visibility and additional impact analysis performed for original ATC permits.	HOC complies with applicable sections as required by PSD regulations.
40 CFR Part 52.1470	SIP Rules	Applicable – HOC is classified as a Title V source, and SIP rules apply.	Applicable monitoring and record keeping of emissions data.	HOC is in compliance with applicable state SIP requirements including monitoring and record keeping of emissions data.
40 CFR Part 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions	Applicable – HOC is an affected facility under the regulations.	Applicable monitoring, recordkeeping and reporting requirements.	HOC complies with applicable requirements.
40 CFR Part 60, Subpart Dc	New Source Performance Standards – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units	Applicable – HOC has a boilers with heat input greater than 10 MMBtu/hr.	The boilers meet applicable NO _x and PM emission standards. NO _x emissions determined by EPA Method 7E and PM ₁₀ by EPA Method 201/201a and 202.	HOC complies with applicable requirements.
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)	Applicable – Emissions from stacks are subject to opacity standards.	Opacity determined by EPA Method 9.	HOC complies with applicable requirements.

VII. EMISSION REDUCTION CREDITS (OFFSETS)

The source is subject to offset requirements in accordance with Section 59 of the Clark County Air Quality Regulations. Offset requirements and associated mitigation are pollutant-specific.

VIII. ADMINISTRATIVE REQUIREMENTS

Section 19 requires that DAQEM identify the original authority for each term or condition in the Part 70 Operating Permit. Such reference of origin or citation is denoted by *[italic text in brackets]* after each Part 70 Permit condition.

DAQEM proposes to issue the Part 70 Operating Permit conditions on the following basis:

Legal:

On December 5, 2001 in Federal Register Volume 66, Number 234 FR30097 the EPA fully approved the Title V Operating Permit Program submitted for the purpose of complying with the Title V requirements of the 1990 Clean Air Act Amendments and implementing Part 70 of Title 40 Code of Federal Regulations.

Factual:

Harrah's Operating Company, Inc. has supplied all the necessary information for DAQEM to draft Part 70 Operating Permit conditions encompassing all applicable requirements and corresponding compliance.

Conclusion:

DAQEM has determined that Harrah's Operating Company, Inc. will continue to determine compliance through the use of performance testing, quarterly reporting, recordkeeping, coupled with annual certifications of compliance. DAQEM proceeds with the preliminary decision that a Part 70 Operating Permit should be issued as drafted to Harrah's Operating Company, Inc. for a period not to exceed five (5) years.

DRAFT