



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Treasure Island Casino, Red Wing, MN

FROM: Charles Zeman, Physical Scientist
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Treasure Island Casino

Facility Location: 5734 Sturgeon Lake Road, Red Wing, MN

Date of Inspection: August 28, 2024

EPA Inspector(s):

1. Charles Zeman, Physical Scientist
2. David Sutlin, Environmental Engineer

Other Attendees:

1. Brad Johnson, Electrical Engineer – *Treasure Island Casino*
2. Darrell Breuer (phone), Director of Projects and Initiatives – *Treasure Island Casino*

Contact Email Address: Gabriel Miller (Tribal Liaison) – Gabriel.Miller@piic.org

Purpose of Inspection: Title V Full Compliance Evaluation

Facility Type: Casino on Tribal Lands

Regulations Central to Inspection: The facility's diesel-powered generators are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for reciprocating internal

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combustion engines (Subpart ZZZZ). These rules are collated into the facility's federally enforceable Title V permit (Permit Number 2022-71MNPI-001).

Arrival Time: 4:20 pm

Departure Time: 5:30 pm

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided. Reason:
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Brad Johnson unless otherwise noted.

Process Description:

The casino is located on tribal lands, operates 24 hours per day, and has an estimated 1400 - 1600 employees on site. The facility houses 4 permitted diesel-fired internal combustion engines (generators) that provide 100% of power to the casino during load shed events (1 to 2 times per summer) and during emergencies. The generators are owned and operated by NRG Reliability Solutions, LLC (NRG), which leases them to the casino. NRG is the holder of the Title V permit.

Staff Interview: The facility also houses 3 non-permitted generators used as backup, which are very seldomly operated.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA attempted to contact tribal liaisons to coordinate the inspection with NRG, but received no response. At the time of EPA's inspection, none of the generators were in operation. All permitted generators were housed in a single stand-alone building in the periphery of the facility grounds, with usage and parameters (catalyst differential pressure and temperature) digitally logged. Each generator logged approximately 2000 hours of lifetime use. Given that the emission units were installed in 2001, EPA estimates that this corresponds to an average of < 90 hours of use per year. The facility's Title V permit limits usage to 550 hours per year as a rolling 12-month sum.

Following the inspection, several records of emission unit operations were requested. The facility's Title V permit requires that the permittee provide EPA with access to any records that must be kept under the conditions of the permit [40 C.F.R. § 71.6(c)(2)]. EPA was not provided with the requested documents.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

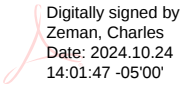
CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Annual hours of operation for all four campus generators for the past 5 years
- CPMS records for each campus generator for the past 5 years
- Monthly fuel usage for all four campus generators for the past 5 years
- All performance test final reports for the past 5 years
- All reports, if any, of excess emissions made in the past 5 years
- Subpart ZZZZ Compliance Reports for the past 5 years
- HVAC repair and maintenance records for the past 2 years
- HVAC technician certifications for the past 2 years

DIGITAL SIGNATURES

Report Author: Zeman, Charles
 Digitally signed by Zeman, Charles
Date: 2024.10.24 14:01:47 -05'00'

Section Supervisor: BRIAN DICKENS
 Digitally signed by BRIAN DICKENS
Date: 2024.10.24 14:58:33 -05'00'