



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Grand Casino Hinckley, Hinckley, MN

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

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

TO: File

BASIC INFORMATION

Facility Name: Grand Casino Hinckley

Facility Location: 777 Lady Luck Drive, Hinckley, MN

Date of Inspection: August 28, 2024

EPA Inspector(s):

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

Other Attendees:

1. Alex Bittner, Facility Shift Lead – *Grand Casino Hinckley*
2. Levi Wilson, HVAC Manager – *Grand Casino Hinckley*
3. Charles Lippert, Air Quality Specialist – *Tribal Liaison*

Contact Email Address: Charles Lippert – Charlie.Lippert@millelacsband.com

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). Comfort cooling operations are subject to 40 C.F.R. Part 82, Protection of Stratospheric Ozone. These rules are collated into the facility's federally enforceable Title V permit (Permit Number 2021-71MNSL-003).

Arrival Time: 1:20 pm

Departure Time: 2:00 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 Alex Bittner or Levi Wilson unless otherwise noted.

Process Description:

The casino is located on tribal lands, operates 24 hours per day, and has an estimated 800 employees on site. The facility houses 3 permitted diesel-powered generators controlled by an oxidation catalyst that supply less than 5% of power to the casino. The generators are operated primarily during peak hours of the summer season.

The facility's comfort cooling systems has several units using R-22 refrigerant, with 7 new rooftop units installed 2 years ago using newer generation refrigerants.

Staff Interview: The majority of power supplied to the casino is provided by East Central Energy and the generators are primarily used as backups. Each generator was operated for < 90 hours in 2023. The facility's Title V permit limits the usage of each generator to 800 hours per year as a rolling 12-month sum [40 C.F.R. § 71.6(a)(1)].

Facility staff stated that no major leaks of R-22 refrigerant have occurred in recent memory.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

At the time of EPA's inspection, none of the generators were in operation. All 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.

The facility's Title V permit limits NO_x emissions from each generator to 14.98 tons per year [40 C.F.R. § 71.6(a)(1)]. Using emission factors determined by performance testing, the facility found no excess emissions within the past 5 years. The most recent performance test was conducted in October, 2021. The conditions of the performance test determine the allowable range of differential pressure across the oxidation catalyst that controls emissions [40 C.F.R. § 63.6603(a)]. Records of the continuous parameter monitoring systems showed differential pressures outside of this allowed range. EPA notes that emission factors determined by performance testing have been trending upwards since 2015.

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 emission units for the past 5 years
- Continuous parameter monitoring systems (CPMS) records for the past 5 years
- Monthly fuel usage for all emission units for the past 5 years
- All performance test final reports for the past 5 years
- All reports of excess emissions made in the past 5 years
- Oxidation catalyst inlet temperature and pressure drop across the catalyst for the past 5 years
- NO_x annual emissions calculations for 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 13:56:33 -05'00'

Section Supervisor: BRIAN DICKENS  Digitally signed by BRIAN DICKENS
Date: 2024.10.24 14:53:55 -05'00'