



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

NOV 21 2019

DATE:

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Grand Casino Mille Lacs, Onamia, Minnesota

FROM: Jason Schenandoah, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Grand Casino Mille Lacs

Facility Location: Grand Avenue, Onamia, Minnesota

Date of Inspection: 9/23/2019

EPA Inspector(s):

1. Jason Schenandoah, Environmental Engineer

Other Attendees

1. Todd Christopherson, Vice President of Facilities, Grand Casino Mille Lacs
2. Jim Hutchison, Electrician, Grand Casino Mille Lacs
3. Steve Meredith, HVAC Lead Technician, Grand Casinos Mille Lacs and Hinckley
4. Charlie Lippert, Air Quality Specialist, Mille Lacs Band of Ojibwe Indians
5. Sara Wandrei, Chemical Engineer, Barr Engineering Co.

Contact Email Address: jhutchison@grcasinos.com; Charlie.Lippert@millelacsband.com;
swandrei@barr.com

Purpose of Inspection: To ensure compliance with the Clean Air Act. Full Compliance Evaluation.

Facility Type: Hotel and casino with emergency generators

Regulations Central to Inspection: NESHAP ZZZZ for reciprocating internal combustion engines, and 40 C.F.R. Part 82 for ozone depleting substances

Arrival Time: 2:35 pm

Departure Time: 3:18 pm

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Grand Casino personnel unless otherwise noted.

Process Description:

Two Caterpillar 3516 stationary, diesel, compression ignition (CI) engine/generator sets manufactured in 2001 (EU 003 in permit, 2000 kW) and 2004 (EU 001 in permit, 2068 kW), and two Caterpillar 3512 stationary, diesel, CI engine/generator sets manufactured in 2001 (EU 004 in permit, 1400 kW) and 2005 (EU 002 in permit, 1250 kW). The engines are used for peak shaving and backup power for the casino and hotel.

Additionally, the facility operates a variety of refrigeration and comfort cooling systems for the casino/hotel.

Staff Interview: Mr. Hutchinson mentioned that units were experiencing a pressure drops below compliance levels. He attributed the reduction in pressure drop to lower loads on the units due to changing many of the facility's lights to LED lights. He also stated that the Grand Casino is working with EPA permitting to undergo new stack tests to remedy the low pressure drop issues.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

All engines were visually inspected and total run hours and energy produced were recorded from the digital display screens.

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

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

For reasons of timeliness all records were requested to be stored on a thumb drive prior to arrival at the facility. EPA requested all data associated with the following list of documents. EPA reviewed the following list of records to determine compliance:

1. Maintenance records;
2. Catalyst inlet temperature, pressure drop across the catalyst and, run time data;
3. Performance test reports;
4. Semi-annual ZZZZ compliance reports;
5. HVAC technician certifications;
6. HVAC repair data; and
7. Part 71 semi-annual and annual reports.

Concerns: Many instances of low differential pressure across catalyst on units EU001, EU002, and EU004. Some monitoring data was not recorded on all units. Catalyst inlet temperature was low on unit EU 004. No 40 C.F.R. Part 82 leak rate calculations.

SIGNATURES

Report Author: _____

Date: _____

Section Chief: _____

Date: _____