



DES
DEPARTMENT OF ENVIRONMENT
AND SUSTAINABILITY



4701 W. Russell Rd Suite 200
Las Vegas, NV 89118-2231
Phone (702) 455-5942
Fax (702) 383-9994

PART 70 OPERATING PERMIT

SOURCE ID: 257

Caesars Entertainment, Inc.
Caesars Consolidated Properties

Harrah's Las Vegas, 3475 S. Las Vegas Blvd.
Flamingo Las Vegas, 3555 S. Las Vegas Blvd.
Horseshoe Las Vegas, 3645 S. Las Vegas Blvd.
Caesars Palace, 3570 S. Las Vegas Blvd.
The Cromwell Las Vegas, 3595 S. Las Vegas Blvd.
Paris Las Vegas, 3655 S. Las Vegas Blvd.

The LINQ Hotel & Casino, 3535 S. Las Vegas Blvd.
Planet Hollywood, 3667 S. Las Vegas Blvd.
LINQ Complex - High Roller, 3545 S. Las Vegas Blvd.
Battista's, 4041 Audrie St.
Forum Meeting Center, 3911 Koval Lane

ISSUED ON: September 23, 2021

EXPIRES ON: September 22, 2026

Revised on: April 24, 2023

Current action: Significant Revision

Issued to:

Caesars Entertainment, Inc.
One Caesars Palace Drive
Las Vegas, Nevada 89109

Responsible Official:

Eric Dominguez
SVP Engineering & Asset Mgt.
PHONE: (702) 880-6876 FAX: (702) 407-6456
EMAIL: edominguez@caesars.com

NATURE OF BUSINESS:

SIC 7011, "Hotels and Motels"
NAICS 721120, "Casino Hotels"

Issued by the Clark County Department of Environment and Sustainability/Division of Air Quality in accordance with Section 12.5 of the Clark County Air Quality Regulations.

Theodore A. Lendis, Permitting Manager

EXECUTIVE SUMMARY

Caesars Consolidated Properties (Caesars) is a major stationary source for nitrogen oxides (NO_x), a major Part 70 source for carbon monoxide (CO), and a minor source for particulate matter less than 10 microns in diameter (PM₁₀), particulate matter less than 2.5 microns in diameter (PM_{2.5}), sulfur oxides (SO_x), volatile organic compounds (VOCs), and hazardous air pollutants (HAPs). The source is also identified as a major source of greenhouse gases (GHGs). It is located on 1 Caesars Palace Drive, Las Vegas, Nevada, in the Las Vegas Valley airshed (Hydrographic Area (HA) 212). HA 212 is in attainment for all regulated air pollutants except ozone; effective January 5, 2023, the U.S. Environmental Protection Agency (EPA) designated HA 212 in moderate nonattainment for the 2015 ozone National Ambient Air Quality Standard (NAAQS). HA 212 is also subject to a maintenance plan for the CO and PM₁₀ NAAQS.

Caesars owns and operates several adjacent and contiguous hotels and casinos and a convention center grouped under SIC code 7011, “Hotels and Motels” (NAICS code 721120, “Casino Hotels”). The source is operating eleven facilities: Harrah’s Las Vegas, Flamingo Las Vegas, Horseshoe Las Vegas, The Cromwell Las Vegas, Caesars Palace, Paris Las Vegas, The LINQ Hotel & Casino, Planet Hollywood, LINQ Complex – High Roller, Battista’s, and the Forum Meeting Center. Caesars is not classified as a categorical Stationary Source, as defined in Section 12.2.2(j) of the Clark County Air Quality Regulations (AQRs).

The table below summarizes the source-wide potential to emit (PTE) for each regulated air pollutant.

Source PTE (tons per year)

PM₁₀	PM_{2.5}	NO_x	CO	SO₂	VOC	HAPs	GHG
70.57	70.57	453.11	188.16	2.26	27.47	5.90	322,775.70

The Clark County Department of Environment and Sustainability (DES), Division of Air Quality (DAQ), issued a renewal Part 70 Operating Permit (OP) on September 23, 2021. This permitting action is based on the revision application submitted on May 9, 2022.

Pursuant to AQR 12.5.2, all terms and conditions in Sections 1 through 10 and the attachments in this permit are federally enforceable unless explicitly denoted otherwise.

TABLE OF CONTENTS

1.0	EMISSION UNITS AND APPLICABLE REQUIREMENTS	7
1.1	HARRAH'S LAS VEGAS.....	7
1.1.1	Emission Units	7
1.1.2	Controls.....	8
1.1.3	Limitations and Standards.....	9
1.1.4	Compliance Demonstration Requirements	11
1.2	FLAMINGO LAS VEGAS.....	13
1.2.1	Emission Units	13
1.2.2	Controls.....	14
1.2.3	Limitations and Standards.....	15
1.2.4	Compliance Demonstration Requirements	17
1.3	HORSESHOE LAS VEGAS.....	20
1.3.1	Emission Units	20
1.3.2	Controls.....	21
1.3.3	Limitations and Standards.....	22
1.3.4	Compliance Demonstration Requirements	24
1.4	THE CROMWELL LAS VEGAS.....	26
1.4.1	Emission Units	26
1.4.2	Controls.....	27
1.4.3	Limitations and Standards.....	28
1.4.4	Compliance Demonstration Requirements	29
1.5	CAESARS PALACE	31
1.5.1	Emission Units	31
1.5.2	Controls.....	32
1.5.3	Limitations and Standards.....	36
1.5.4	Compliance Demonstration Requirements	38
1.6	PARIS LAS VEGAS.....	43
1.6.1	Emission Units	43
1.6.2	Controls.....	44
1.6.3	Limitations and Standards.....	46
1.6.4	Compliance Demonstration Requirements	48
1.7	THE LINQ HOTEL & CASINO.....	50
1.7.1	Emission Units	50
1.7.2	Controls.....	51
1.7.3	Limitations and Standards.....	52
1.7.4	Compliance Demonstration Requirements	54
1.8	PLANET HOLLYWOOD.....	56
1.8.1	Emission Units	56
1.8.2	Controls.....	56
1.8.3	Limitations and Standards.....	58
1.8.4	Compliance Demonstration Requirements	59
1.9	LINQ COMPLEX – HIGH ROLLER.....	61
1.9.1	Emission Units	61

1.9.2	Controls.....	62
1.9.3	Limitations and Standards.....	63
1.9.4	Compliance Demonstration Requirements	65
1.10	BATTISTA’S.....	67
1.10.1	Emission Units	67
1.10.2	Controls.....	67
1.10.3	Limitations and Standards.....	67
1.10.4	Compliance Demonstration Requirements	67
1.11	FORUM MEETING CENTER	68
1.11.1	Emission Units	68
1.11.2	Controls.....	68
1.11.3	Limitations and Standards.....	69
1.11.4	Compliance Demonstration Requirements	70
1.12	Insignificant Activities	72
1.13	Nonroad Engines.....	73
2.0	VISIBLE EMISSIONS REQUIREMENTS	74
3.0	GENERAL TESTING.....	76
4.0	GENERAL RECORDKEEPING	77
5.0	REPORTING AND NOTIFICATIONS	78
6.0	MITIGATION.....	82
7.0	PERMIT SHIELD	83
8.0	ACID RAIN PROGRAM REQUIREMENTS	84
9.0	OTHER REQUIREMENTS	85
10.0	ADMINISTRATIVE REQUIREMENTS.....	86
10.1	General.....	86
10.2	Modification, Revision, and Renewal Requirements.....	87
11.0	ATTACHMENTS	89
11.1	Applicable Regulations.....	89
11.2	Insignificant Activities	91

LIST OF TABLES

Table 1-1: Summary of EUs – Harrah’s Las Vegas	7
Table 1-2: PTE (tons per year) – Harrah’s Las Vegas.....	10
Table 1-3: Summary of EUs – Flamingo Las Vegas	13
Table 1-4: PTE (tons per year) – Flamingo Las Vegas	16
Table 1-5: Emissions – Flamingo Las Vegas	17
Table 1-6: Performance Testing Protocol Requirements.....	18
Table 1-7: Summary of EUs – Horseshoe Las Vegas.....	20
Table 1-8: PTE (tons per year) – Horseshoe Las Vegas.....	23
Table 1-9: Emissions – Horseshoe Las Vegas.....	24
Table 1-10: Performance Testing Protocol Requirements.....	25
Table 1-11: Summary of EUs – The Cromwell Las Vegas	26
Table 1-12: PTE (tons per year) – The Cromwell Las Vegas.....	29
Table 1-13: Summary of EUs – Caesars Palace	31
Table 1-14: PTE (tons per year) – Caesars Palace.....	37
Table 1-15: Emissions – Caesars Palace.....	38
Table 1-16: Performance Testing Protocol Requirements.....	40
Table 1-17: Vapor Recovery System Testing Procedures and Schedules	40
Table 1-18: Summary of EUs – Paris Las Vegas	43
Table 1-19: PTE (tons per year) – Paris Las Vegas.....	47
Table 1-20: Emissions – Paris Las Vegas.....	47
Table 1-21: Performance Testing Protocol Requirements.....	49
Table 1-22: Summary of EUs – The LINQ Hotel & Casino	50
Table 1-23: PTE (tons per year) – The LINQ Hotel & Casino.....	53
Table 1-24: Emissions – The LINQ Hotel & Casino.....	53
Table 1-25: Performance Testing Protocol Requirements.....	55
Table 1-26: Summary of EUs – Planet Hollywood	56
Table 1-27: PTE (tons per year) – Planet Hollywood.....	58
Table 1-28: Emissions – Planet Hollywood.....	59
Table 1-29: Performance Testing Protocol Requirements.....	60
Table 1-30: Summary of EUs – LINQ Complex – High Roller.....	62
Table 1-31: PTE (tons per year) – The Cromwell Las Vegas.....	64
Table 1-32: Summary of EUs – Forum Meeting Center.....	68
Table 1-33: PTE (tons per year) – Forum Meeting Center.....	70
Table 5-1: Required Submission Dates for Various Reports.....	80
Table 11-1: Applicable Clark County AQRs.....	89
Table 11-2: Federal Standards	90
Table 11-3: Insignificant Units and Activities.....	91

Common Acronyms and Abbreviations

(These terms may be seen in the permit)

Acronym	Term
AQR	Clark County Air Quality Regulation
AST	aboveground storage tank
ATC	Authority to Construct
Avgas	aviation gasoline
CARB	California Air Resources Board
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
DOM	date of manufacture
EPA	U.S. Environmental Protection Agency
EU	emission unit
GDO	gasoline dispensing operation
GHG	greenhouse gas
HAP	hazardous air pollutant
hp	horsepower
kW	kilowatts
MMBtu/hr	Millions of British Thermal Units per Hour
MSP	Minor Source Permit
NAC	Nevada Administrative Code
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standard
NTTR	Nevada Test and Training Range
OP	Operating Permit
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter less than 10 microns in diameter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTE	potential to emit
RICE	reciprocating internal combustion engine
SDS	Safety Data Sheet
SIP	State Implementation Plan
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
UST	underground storage tank
VMT	vehicle miles traveled
VEE	Visible Emissions Evaluation
VOC	volatile organic compound

1.0 EMISSION UNITS AND APPLICABLE REQUIREMENTS

1.1 HARRAH'S LAS VEGAS

1.1.1 Emission Units

The stationary source activities at Harrah's Las Vegas covered by this Part 70 OP consist of the emission units (EUs) and associated appurtenances summarized in Table 1-1. [AQR 12.5.2.3; NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1 (08/20/2009); Title V 70 OP (03/28/2016), (12/03/2018), and (09/23/2021); and Application for Revision of Part 70 OP (05/09/2022)]

Table 1-1: Summary of EUs – Harrah's Las Vegas

EU	Description	Rating	Make	Model No.	Serial No.
HA06	Natural Gas Boiler	4.50 MMBtu/hr	Bryan	RV450-S-150-FDG	66726 (#5)
HA07	Natural Gas Boiler	9.0 MMBtu/hr	Bryan	LM900-S-15-FDG	66665 (#4)
HA08	Natural Gas Boiler	8.369 MMBtu/hr	Cleaver Brooks	CB.200-200	L-70272 (#1)
HA09	Natural Gas Boiler	8.369 MMBtu/hr	Cleaver Brooks	CB.200-200	L-70271 (#2)
HA10	Natural Gas Boiler	8.369 MMBtu/hr	Cleaver Brooks	CB.200-200	L-70270 (#3)
HA11	Natural Gas Boiler	4.80 MMBtu/hr	Universal Energy	BF108C	10341-1 (#6)
HA12	Emergency Fire Pump DOM: Pre-2006	276 kW	Fairbanks Morse Pump	5922F	3T1-020216
		370 hp	Caterpillar Engine	3406BD1	6TB06046
HA13	Emergency Generator DOM: Pre-2006	800 kW	Marathon Electric Generator	573RSL2056A-P266W	VE3575357
		1,232 hp	Detroit Diesel Engine	81637416	16VF007962
HA14	Emergency Generator DOM: Pre-2006	600 kW	Caterpillar	SR4	6FA06166
		890 hp		3412	81Z09924
HA15	Emergency Generator DOM: Pre-2006	400 kW	Magna One Generator	502FDR8056AB-L000W	KK-95206-3
		536 hp	Detroit Diesel Engine	71237305	12VA069124
HA16	Emergency Generator DOM: Pre-2006	400 kW	Magna One Generator	502FDR8056AB-L000W	KK-95206-1
		536 hp	Detroit Diesel Engine	71237305	12VA069593
HA17	Emergency Generator DOM: Pre-2006	400 kW	Magna One Generator	502FDR8056AB-L000W	KK-95206-2
		536 hp	Detroit Diesel Engine	71237305	12VA066655
HA18		800 kW	Caterpillar	SR-4B	7AJ00864

EU	Description	Rating	Make	Model No.	Serial No.
	Emergency Generator DOM: 1996	1,180 hp		3412	2WJ00740
HA26	Cooling Tower, 2-Cells	5,200 gpm	Evapco	USS 244-3018	17-830216
HA27	Cooling Tower, 2-Cells	5,200 gpm	Evapco	USS 244-3018	17-830217
HA28	Cooling Tower, 2-Cells	5,200 gpm	Evapco	USS 244-3018	17-830218

1.1.2 Controls

1.1.2.1 Control Devices

No add-on controls are identified.

1.1.2.2 Control Requirements

Boilers/Water Heaters

1. The permittee shall combust only natural gas in all boilers/heaters. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's operations and maintenance (O&M) manual for emissions-related components and good combustion practices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
3. The permittee shall operate and maintain the 4.5 MMBtu/hr boiler (EU: HA06) with burners that have a manufacturer's maximum emission concentration of 9 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
4. The permittee shall operate and maintain the 4.5 MMBtu/hr boiler (EU: HA06) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
5. The permittee shall operate and maintain the 9.0 MMBtu/hr boiler (EU: HA07) with burners that have a manufacturer's maximum emission concentration of 30 ppm NO_x, corrected to 3% oxygen, and flue gas recirculation control devices (FGR). *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
6. The permittee shall operate and maintain the 9.0 MMBtu/hr boiler (EU: HA07) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
7. The permittee shall operate and maintain the 8.369 MMBtu/hr boilers (EUs: HA08 through HA10) with burners that have a manufacturer's maximum emission concentration of 12 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

8. The permittee shall operate and maintain the 8.369 MMBtu/hr boilers (EUs: HA08 through HA10) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
9. The permittee shall operate and maintain the 4.80 MMBtu/hr boiler (EU: HA11) with burners that have a manufacturer's maximum emission concentration of 30 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
10. The permittee shall operate and maintain the 4.80 MMBtu/hr boiler (EU: HA11) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

Diesel Generators/Fire Pumps

11. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generators and fire pump (EUs: HA12 through HA18). *[40 CFR 63.6604(b)]*
12. The permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's O&M manual for emissions-related components. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

Cooling Towers

13. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
14. No chromium-containing compounds shall be used for water treatment. *[40 CFR Part 63.402]*
15. The permittee shall operate the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.001% (EUs: HA26 through HA28). *[Title V 70 OP (12/03/2018)]*
16. The permittee shall limit the total dissolved solids (TDS) content of each cooling tower's circulation water to 5,000 ppm (EUs: HA26 through HA28). *[Title V 70 OP (12/03/2018)]*

Other

17. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

1.1.3 Limitations and Standards

1.1.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: HA13 through HA18) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or

nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: [40 CFR Part 63.6640]

- a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
2. The permittee shall limit the operation of the fire pump (EU: HA12) for testing and maintenance purposes to 100 hours/year. The permittee may operate the fire pump up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. [40 CFR Part 63.6640]

1.1.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-2. [AQR 12.5.2.6(a); NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1 (08/20/2009); Title V 70 OP (03/28/2016); Title V 70 OP (12/03/2018); and Application for Revision of Part 70 OP (05/09/2022)]

Table 1-2: PTE (tons per year) – Harrah’s Las Vegas

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
HA06	8,760 hr/yr	0.15	0.15	0.21	0.73	0.01	0.11	0.04
HA07	8,760 hr/yr	0.30	0.30	1.44	1.46	0.02	0.21	0.07
HA08	8,760 hr/yr	0.27	0.27	0.54	1.36	0.02	0.2	0.07
HA09	8,760 hr/yr	0.27	0.27	0.54	1.36	0.02	0.2	0.07
HA10	8,760 hr/yr	0.27	0.27	0.54	1.36	0.02	0.2	0.07
HA11	8,760 hr/yr	0.16	0.16	0.77	0.78	0.01	0.11	0.04
HA12	500 hr/yr	0.20	0.20	2.87	0.62	0.01	0.23	0.01
HA13	500 hr/yr	0.22	0.22	7.39	1.69	0.01	0.22	0.01
HA14	500 hr/yr	0.16	0.16	5.34	1.22	0.01	0.16	0.01
HA15	500 hr/yr	0.29	0.29	4.15	0.90	0.01	0.34	0.01
HA16	500 hr/yr	0.29	0.29	4.15	0.90	0.01	0.34	0.01

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
HA17	500 hr/yr	0.29	0.29	4.15	0.90	0.01	0.34	0.01
HA18	500 hr/yr	0.21	0.21	7.08	1.62	0.01	0.21	0.01
HA26	8,760 hr/yr	0.27	0.27	0	0	0	0	0
HA27	8,760 hr/yr	0.27	0.27	0	0	0	0	0
HA28	8,760 hr/yr	0.27	0.27	0	0	0	0	0

- The permittee shall not discharge into the atmosphere, from any emission unit in this section, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. [AQR 26.1]

1.1.4 Compliance Demonstration Requirements

1.1.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

- The permittee shall perform a burner efficiency test once each calendar year (EUs: HA06 through HA11). [AQR 12.5.2.6(d)]
- The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: HA06 through HA11). [AQR 12.5.2.6(d)]
- The permittee shall not have to perform a burner efficiency test if the actual hours of operation are 0. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: HA06 through HA11). [AQR 12.5.2.6(d)]
- The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: HA06 through HA11). [AQR 12.5.2.6(d)]

Diesel Generators/Fire Pumps

- The permittee shall operate each diesel-fired emergency generator engine and fire pump (EUs: HA12 through HA18) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. [AQR 12.5.2.6(d)]
- The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators and fire pump (EUs: HA12 through HA18) by retaining a copy of vendor fuel specifications. [40 CFR 63.6604(b)]

1.1.4.2 Testing

No performance testing requirements have been identified for units at Harrah's Las Vegas at this time.

1.1.4.3 Recordkeeping

1. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EUs: HA26 through HA28);

Boilers/Water Heater

- d. Burner efficiency test results (EUs: HA06 through HA11);

Emergency Engines

- e. Date and duration of operation of each diesel-fired emergency generator and each fire pump for testing, maintenance, and nonemergency use (EUs: HA12 through HA18) (reported semiannually);
- f. Monthly duration of operation of each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency (EUs: HA12 through HA18) (reported semiannually);
- g. Sulfur content and cetane index or aromatic content of diesel fuel used to power the emergency generators and fire pump (EU: HA12 through HA18), as certified by the supplier;

Nonroad Engines

- h. Records of location changes for nonroad engines, if applicable;

Emissions

- i. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
- j. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
- k. Calendar year annual emissions calculated for each emission unit in this section (reported annually).

2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.2 FLAMINGO LAS VEGAS

1.2.1 Emission Units

The stationary source activities at Flamingo Las Vegas, covered by this Part 70 OP, consist of the emission units and associated appurtenances summarized in Table 1-3. [AQR 12.5.2.3; NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1 (08/20/2009); NSR ATC (02/23/11); and Title V OP (05/29/2013), (03/28/2016), and (12/03/2018)]

Table 1-3: Summary of EUs – Flamingo Las Vegas

EU	Description	Rating	Make	Model No.	Serial No.
FL01	Natural Gas Boiler	14.343 MMBtu/hr	Johnston	8786	9180-01
FL02	Natural Gas Boiler	14.645 MMBtu/hr	Kewanee	H3S-350-G	10016
FL03	Natural Gas Boiler	14.645 MMBtu/hr	Kewanee	H3S-350-G	10017
FL04	Natural Gas Boiler	14.645 MMBtu/hr	Kewanee	H3S-350-G	10476
FL05	Natural Gas Boiler	8.165 MMBtu/hr	Cleaver Brooks	CBI 700-200-150	0L104650
FL06	Emergency Fire Pump DOM: Pre-2006	313 kW	Fairbanks Morse Pump	5922	K3P1017265
		420 hp	Caterpillar Engine	3406	6TB02994
FL09	Emergency Generator DOM: 1999	750 kW	Caterpillar	SR4B	6EJ01215
		1,109 hp		3412	2WJ02515
FL10	Emergency Generator DOM: 1999	750 kW	Caterpillar	SR4B	6EJ01238
		1,109 hp		3412	2WJ02570
FL11	Emergency Generator DOM: Pre-2006	475 kW	Caterpillar	SR4	6EA01398
		724 hp		3412	81Z08892
FL26	Emergency Generator DOM: 2010	600 kW	Caterpillar	LC7	G7A03394
		923 hp		C18	EST01182
FL28	Cooling Tower, 4-cells	9,600 gpm	Marley	NC8411TAN4BGF	10050562-(A1-A4)
FL29	Cooling Tower, 2-Cells	3,800 gpm	Evapco	USS 244-3N18	17-833834
FL30	Cooling Tower, 2-Cells	3,800 gpm	Evapco	USS 244-3N18	17-833835
FL31	Cooling Tower, 2-Cells	3,800 gpm	Evapco	USS 244-3N18	17-833836

1.2.2 Controls

1.2.2.1 Control Devices

No add-on controls are identified.

1.2.2.2 Control Requirements

Boilers/Water Heaters

1. The permittee shall combust only natural gas in all boilers/heaters. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
3. The permittee shall operate and maintain the 14.343 MMBtu/hr boiler (EU: FL01) with burners that have a manufacturer's maximum emission concentration of 29 ppm NO_x, corrected to 3% oxygen, and FGR control devices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
4. The permittee shall operate and maintain the 14.343 MMBtu/hr boiler (EU: FL01) with burners that have a manufacturer's maximum emission concentration of 95 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
5. The permittee shall operate and maintain the three 14.645 MMBtu/hr boilers (EUs: FL02 through FL04) with burners that have a manufacturer's maximum emission concentration of 40 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*
6. The permittee shall operate and maintain the three 14.645 MMBtu/hr boilers (EUs: FL02 through FL04) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*
7. The permittee shall operate and maintain the 8.165 MMBtu/hr boiler (EU: FL05) with burners that have a manufacturer's maximum emission concentration of 29 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
8. The permittee shall operate and maintain the 8.165 MMBtu/hr boiler (EU: FL05) with burners that have a manufacturer's maximum emission concentration of 55 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

Diesel Generators/Fire Pumps

9. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generators and fire pump (EUs: FL06, FL09 through FL11, and FL26). *[40 CFR 63.6604(b)]*
10. The permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's O&M manual for emissions-related components. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

11. The permittee shall ensure that the diesel engine is in compliance with 40 CFR Part 60, Subpart III, by meeting of all of the following (EU: FL26): *[40 CFR Part 60.4206]*
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Cooling Towers

12. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
13. No chromium-containing compounds shall be used for water treatment. *[40 CFR Part 63.402]*
14. The permittee shall operate the cooling tower with drift eliminators with a manufacturer's maximum drift rate of 0.005% (EUs: FL28). *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
15. The permittee shall operate the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.001% (EUs: FL29 through FL31). *[Title V OP (12/03/2018)]*
16. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm (EUs: FL28 through FL31). *[Title V OP (12/03/2018)]*

Other

17. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

1.2.3 Limitations and Standards

1.2.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: FL09 through FL11 and FL26) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: *[40 CFR Part 60.4211 and 40 CFR Part 63.6640]*
 - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.

- b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
2. The permittee shall limit the operation of the fire pump (EU: FL06) for testing and maintenance purposes to 100 hours/year. The permittee may operate the fire pump up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. [40 CFR Part 63.6640]

1.2.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-4. [NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1 (08/20/2009); NSR ATC (02/23/11); and Title V OP (05/29/2013), (03/28/2016), and (12/03/2018)]

Table 1-4: PTE (tons per year) – Flamingo Las Vegas

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
FL01	8,760 hr/yr	0.47	0.47	2.21	4.42	0.04	0.34	0.12
FL02	8,760 hr/yr	0.48	0.48	3.12	2.37	0.04	0.35	0.12
FL03	8,760 hr/yr	0.48	0.48	3.12	2.37	0.04	0.35	0.12
FL04	8,760 hr/yr	0.48	0.48	3.12	2.37	0.04	0.35	0.12
FL05	8,760 hr/yr	0.27	0.27	1.26	1.46	0.02	0.19	0.07
FL06	500 hr/yr	0.23	0.23	3.26	0.70	0.01	0.26	0.01
FL09	500 hr/yr	0.19	0.19	6.65	1.52	0.01	0.20	0.01
FL10	500 hr/yr	0.19	0.19	6.65	1.52	0.01	0.20	0.01
FL11	500 hr/yr	0.13	0.13	4.34	1.00	0.01	0.13	0.01
FL26	500 hr/yr	0.03	0.03	3.13	0.44	0.01	0.04	0.01
FL28	8,760 hr/yr	2.49	2.49	0.00	0.00	0.00	0.00	0.00
FL29	8,760 hr/yr	0.20	0.20	0.00	0.00	0.00	0.00	0.00
FL30	8,760 hr/yr	0.20	0.20	0.00	0.00	0.00	0.00	0.00
FL31	8,760 hr/yr	0.20	0.20	0.00	0.00	0.00	0.00	0.00

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

2. The permittee shall not allow actual emissions from the individual emission units to exceed the emission rates and emission concentrations listed in Table 1-5. *[AQR 12.5.2.3 and NSR ATC, Modification 7, Revision 0 (01/29/2008)]*

Table 1-5: Emissions – Flamingo Las Vegas

EU	Rating	NO _x /CO (ppm) ¹	NO _x (lbs/hr)	CO (lbs/hr)
FL01	14.343 MMBtu/hr	NO _x 29/CO 95	0.51	1.01
FL02	14.645 MMBtu/hr	NO _x 40/CO 50	0.71	0.54
FL03	14.645 MMBtu/hr	NO _x 40/CO 50	0.71	0.54
FL04	14.645 MMBtu/hr	NO _x 40/CO 50	0.71	0.54

¹Corrected to 3% oxygen.

3. The permittee shall not discharge into the atmosphere, from any external combustion unit in this section, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[AQR 26.1]*

1.2.4 Compliance Demonstration Requirements

1.2.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

1. The permittee shall install and utilize nonresettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: FL01 through FL04). *[AQR 12.5.2.6(d) and 40 CFR Part 60.48c(g)(1)]*
2. The permittee, when operating a boiler with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr but less than 10.0 MMBtu/hr, shall perform a burner efficiency test once each calendar year (EU: FL05). *[AQR 12.5.2.6(d)]*
3. The permittee, when operating a boiler with a maximum heat input rating equal to or greater than 10.0 MMBtu/hr, shall perform a burner efficiency test twice each calendar year, at least five months apart, but no more than seven (EUs: FL01 through FL04). *[AQR 12.5.2.6(d)]*
4. The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: FL01 through FL05). *[AQR 12.5.2.6(d)]*
5. The permittee may choose not to perform a burner efficiency test on a boiler during the calendar year if the documented actual hours of operation of that boiler, with a maximum heat input rating equal to or greater than 4.0 MMBtu/hr but less than 10.0 MMBtu/hr, are zero during a calendar year. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: FL05). *[AQR 12.5.2.6(d)]*
6. The permittee may perform a burner efficiency test once each calendar year if the actual hours of operation are less than 50. To exercise this option, the permittee must install an hour

meter and begin keeping written records before the start of the calendar year (EUs: FL01 through FL04). [AQR 12.5.2.6(d)]

7. The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: FL01 through FL05). [AQR 12.5.2.6(d)]

Diesel Generators/Fire Pumps

8. The permittee shall operate each diesel-fired emergency generator engine and fire pump (EUs: FL06, FL09 through FL11, and FL26) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. [AQR 12.5.2.6(d)]
9. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators and fire pump (EUs: FL06, FL09 through FL11, and FL26) by retaining a copy of vendor fuel specifications. [40 CFR 60.4207(b) and 40 CFR 63.6604(b)]

Cooling Towers

10. The permittee shall continue to monitor the TDS in the cooling tower circulation water monthly. The permittee shall use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 12.5.2.6(d)]

1.2.4.2 Testing

Boiler Performance Tests

1. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: FL01 through FL04). [AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]
2. The permittee shall conduct performance tests on each boiler (EUs: FL01, FL02, FL03, and FL04) every five years, and no later than 90 days after the anniversary date of the last performance test. [AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]

Table 1-6: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Stack Gas Parameters	—	EPA Methods 1, 2, 3A, and 4

1.2.4.3 Recordkeeping

1. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer’s authorized representative upon request and without prior notice during the permittee’s hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EUs: FL28 through FL31);

Boilers/Water Heater

- d. Monthly natural gas fuel consumed by each boiler (EUs: FL01 through FL04) (reported semiannually);
- e. Burner efficiency test results (EUs: FL01 through FL05);

Emergency Engines

- f. Date and duration of operation of each diesel-fired emergency generator and each fire pump for testing, maintenance, and nonemergency use (EUs: FL06 and FL09 through FL11 and FL26) (reported semiannually);
- g. Monthly duration of operation of each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency (EUs: FL06 and FL09 through FL11 and FL26) (reported semiannually);
- h. Sulfur content and cetane index or aromatic content of diesel fuel used to power the emergency generator and fire pump, as certified by the supplier (EU: FL06, FL09 through FL11, and FL26);

Nonroad Engines

- i. Records of location changes for nonroad engines, if applicable;

Emissions

- j. Performance test results, if applicable (reported as required by Section 1.2.4.2 of this permit);
 - k. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
 - l. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
 - m. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or

measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.

- The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.3 HORSESHOE LAS VEGAS

1.3.1 Emission Units

The stationary source activities at Horseshoe Las Vegas, covered by this Part 70 OP, consist of the emission units and associated appurtenances summarized in Table 1-7. [AQR 12.5.2.3; NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1 (08/20/2009); and Title V OP (03/28/2016), (05/05/2017), (12/19/2019), and (09/23/2021)]

Table 1-7: Summary of EUs – Horseshoe Las Vegas

EU	Description	Rating	Make	Model No.	Serial No.
BA01	Natural Gas Boiler	16.8 MMBtu/hr	Kewanee	H3S-750-G02	NB-24935
BA02	Natural Gas Boiler	16.8 MMBtu/hr	Kewanee	H3S-750-G02	NB-25232
BA03	Natural Gas Boiler	25.106 MMBtu/hr	Kewanee	H3S-750-G02	NB-24875
BA04	Emergency Generator (#1) DOM: Pre-2006	1,000 kW	Magna One	682FDR8080AB-P667W	LD95982-1
		1,340 hp	Detroit Diesel	9163-7305	16E0006591
BA05	Emergency Generator (#2) DOM: Pre-2006	1,000 kW	Magna One	682FDR8080AB-P667W	LD-95982-2
		1,340 hp	Detroit Diesel	9163-7305	16E0006592
BA06	Emergency Generator DOM: Pre-2006	500 kW	Magna One	500SR9E	66111
		670 hp	Detroit Diesel	7163-7305	16VA7496
BA07	Emergency Generator DOM: Pre-2006	155 kW	Magna One	440FDR8024GG-H000W	LD-94032
		200 hp	Detroit Diesel		
BA11	Emergency Generator (#3) DOM: Pre-2006	1,000 kW	Detroit	1000 DS	600214
		1,340 hp		L18107	24VA001710
BA12	Emergency Generator (#4) DOM: Pre-2006	1,000 kW	Detroit	1000 DS	600215
		1,340 hp		L18127	24VA001728
BA17	Emergency Fire Pump	526 hp	Clarke Fire Pump	JX6H-UFADK0-D	RG6135L023246

EU	Description	Rating	Make	Model No.	Serial No.
	DOM: 06/2011		John Deere Engine	6135HFC48A	
BA18	Emergency Fire Pump DOM: 04/2011	526 hp	Clarke Fire Pump	JX6H-UFADK0-D	RG6135L022100
			John Deere Engine	6135HFC48A	
BA19	Cooling tower – 3 cells	18,000 GPM	Evapco	USS 314-4O72	16-804451
BA20	Cooling tower – 3 cells	18,000 GPM	Evapco	USS314-4O72	16-804450

1.3.2 Controls

1.3.2.1 Control Devices

No add-on control devices have been identified.

1.3.2.2 Control Requirements

Boilers/Water Heaters

1. The permittee shall combust only natural gas in all boilers/heaters. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
3. The permittee shall operate and maintain each of the 16.8 MMBtu/hr boilers (EUs: BA01 and BA02) with burners that have a manufacturer's maximum emission concentration of 25 ppm NO_x, corrected to 3% oxygen, and FGR control devices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
4. The permittee shall operate and maintain each of the 16.8 MMBtu/hr boilers (EUs: BA01 and BA02) with burners that have a manufacturer's maximum emission concentration of 23 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
5. The permittee shall operate and maintain the 25.106 MMBtu/hr boiler (EU: BA03) with burners that have a manufacturer's maximum emission concentration of 25 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
6. The permittee shall operate and maintain the 25.106 MMBtu/hr boiler (EU: BA03) with burners that have a manufacturer's maximum emission concentration of 23 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

Diesel Generators/Fire Pumps

7. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in

the emergency generators and fire pumps (EUs: BA04 through BA07, BA11, BA12, BA17, and BA18). [40 CFR 63.6604(b)]

8. The permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's O&M manual for emissions-related components. [NSR ATC, Modification 10, Revision 0 (12/15/2008)]
9. The permittee shall ensure that the diesel engines are in compliance with 40 CFR Part 60, Subpart IIII, by meeting of all of the following (EUs: BA17 and BA18): [40 CFR Part 60.4211]
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Cooling Towers

10. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. [Title V OP (05/05/2017)]
11. No chromium-containing compounds shall be used for water treatment. [40 CFR Part 63.402]
12. The permittee shall operate the cooling tower with drift eliminators with a manufacturer's maximum drift rate of 0.001% (EU: BA19). [Title V OP (05/05/2017)]
13. The permittee shall operate the cooling tower with drift eliminators that have a manufacturer's maximum drift rate of 0.001% (EU: BA20). [Title V OP (12/19/2019)]
14. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm (EUs: BA19 and BA20). [Title V OP (12/19/2019)]

Other

15. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. [AQR 40 & AQR 43]

1.3.3 Limitations and Standards

1.3.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: BA04 through BA07, BA11, and BA12) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: [40 CFR Part 63.6640]

- a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
2. The permittee shall limit the operation of the fire pumps (EUs: BA17 and BA18) for testing and maintenance purposes to 100 hours/year. The permittee may operate the fire pumps up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR Part 60.4211]*

1.3.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-8. *[AQR 12.5.2.6(a) and AQR 12.4 ATC (June 7, 2022)]*

Table 1-8: PTE (tons per year) – Horseshoe Las Vegas

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
BA01	8,760 hr/yr	0.55	0.55	2.24	1.25	0.04	0.40	0.14
BA02	8,760 hr/yr	0.55	0.55	2.24	1.25	0.04	0.40	0.14
BA03	8,760 hr/yr	0.82	0.82	3.34	1.87	0.07	0.59	0.21
BA04	500 hr/yr	0.23	0.23	8.04	1.84	0.01	0.24	0.01
BA05	500 hr/yr	0.23	0.23	8.04	1.84	0.01	0.24	0.01
BA06	500 hr/yr	0.12	0.12	4.02	0.92	0.01	0.12	0.01
BA07	500 hr/yr	0.11	0.11	1.55	0.33	0.01	0.13	0.01
BA11	500 hr/yr	0.23	0.23	8.04	1.84	0.01	0.24	0.01
BA12	500 hr/yr	0.23	0.23	8.04	1.84	0.01	0.24	0.01
BA17	500 hr/yr	0.01	0.01	0.75	0.12	0.01	0.03	0.01
BA18	500 hr/yr	0.01	0.01	0.75	0.12	0.01	0.03	0.01
BA19	8,760 hr/yr	0.93	0.93	0.00	0.00	0.00	0.00	0.00
BA20	8,760 hr/yr	0.93	0.93	0.00	0.00	0.00	0.00	0.00

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

2. The permittee shall not allow actual emissions from the individual emission units to exceed the emission rates and emission concentrations listed in Table 1-9. *[AQR 12.5.2.3]*

Table 1-9: Emissions – Horseshoe Las Vegas

EU	Rating	NO _x /CO (ppm) ¹	NO _x (lbs/hr)	CO (lbs/hr)
BA01	16.8 MMBtu/hr	NO _x 25/CO 23	0.51	0.29
BA02	16.8 MMBtu/hr	NO _x 25/CO 23	0.51	0.29
BA03	25.106 MMBtu/hr	NO _x 25/CO 23	0.77	0.43

¹Corrected to 3% oxygen.

- The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. [AQR 26.1]

1.3.4 Compliance Demonstration Requirements

1.3.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

- The permittee shall install and utilize nonresettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: BA01 through BA03). [AQR 12.5.2.6(d) and 40 CFR Part 60.48c(g)(1)]
- The permittee shall perform a burner efficiency test twice each calendar year, at least five months apart but no more than seven (EUs: BA01 through BA03). [AQR 12.5.2.6(d)]
- The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: BA01 through BA03). [AQR 12.5.2.6(d)]
- The permittee may perform a burner efficiency test once each calendar year if the actual hours of operation are less than 50. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: BA01 through BA03). [AQR 12.5.2.6(d)]
- The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: BA01 through BA03). [AQR 12.5.2.6(d)]

Diesel Generators/Fire Pumps

- The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators and fire pumps (EUs: : BA04 through BA07, BA11, BA12, BA17, and BA18) by retaining a copy of vendor fuel specifications. [40 CFR 60.4207(b) and 40 CFR 63.6604(b)]
- The permittee shall operate each diesel-fired emergency generator engine and fire pump (EUs: BA04 through BA07, BA11, BA12, BA17, and BA18) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. [AQR 12.5.2.6(d)]

Cooling Towers

8. The permittee shall monitor the TDS in the cooling tower circulation water monthly. The permittee may use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 12.5.2.6(d)]

1.3.4.2 Testing

1. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: BA01, BA02, and BA03). [AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]
2. The permittee shall conduct performance tests on each boiler (EUs: BA01, BA02, and BA03) every five years, and no later than 90 days after the anniversary date of the last performance test. [AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]

Table 1-10: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Stack Gas Parameters	—	EPA Methods 1, 2, 3A, and 4

1.3.4.3 Recordkeeping

1. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer’s authorized representative upon request and without prior notice during the permittee’s hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EUs: BA19 and BA20);

Boilers/Water Heater

- d. Monthly natural gas fuel consumed by each boiler (EUs: BA01 through BA03) (reported semiannually);
- e. Burner efficiency test results (EUs: BA01 through BA03);

Emergency Engines

- f. Date and duration of operation of each diesel-fired emergency generator and each fire pump for testing, maintenance, and nonemergency use (EUs: BA04 through BA07, BA11, BA12, BA17, and BA18) (reported semiannually);
- g. Monthly duration of operation of each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency (EUs: BA04 through BA07, BA11, BA12, BA17, and BA18) (reported semiannually);
- h. Sulfur content and cetane index or aromatic content of diesel fuel used to power the emergency generators and fire pumps (EUs: BA04 through BA07, BA11, BA12, BA17, and BA18), as certified by the supplier;

Nonroad Engines

- i. Records of location changes for nonroad engines, if applicable;

Emissions

- j. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
 - k. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
 - l. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
 3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.4 THE CROMWELL LAS VEGAS

1.4.1 Emission Units

The stationary source activities at The Cromwell Las Vegas, covered by this Part 70 OP consist of the emission units and associated appurtenances summarized in Table 1-11. [AQR 12.5.2.3, Title V OP (03/28/2016), Application for Revision of Part 70 OP (05/09/2022), and NSR ATC (02/23/2023)]

Table 1-11: Summary of EUs – The Cromwell Las Vegas

EU	Description	Rating	Make	Model No.	Serial No.
CR01	Natural Gas Boiler	3.0 MMBtu/hr	Lochinvar	FBN3000	G13H00252062

EU	Description	Rating	Make	Model No.	Serial No.
CR02	Natural Gas Boiler	3.0 MMBtu/hr	Lochinvar	FBN3000	G13H00252063
CR03	Natural Gas Boiler	3.0 MMBtu/hr	Lochinvar	FBN3000	G13H00252141
CR04	Natural Gas Boiler	3.0 MMBtu/hr	Lochinvar	FBN3000	G13H00252065
CR05	Natural Gas Boiler	3.0 MMBtu/hr	Lochinvar	FBN3000	G13H00251706
CR06	Natural Gas Boiler	3.0 MMBtu/hr	Lochinvar	FBN3000	G13H00252064
CR07	Diesel Engine Emergency Generator DOM: 2013	1,500 kW	Caterpillar	SR4B-GD	G4W01097
		2,206 hp	Caterpillar	3512C	EBG01274
CR08	Diesel Engine Emergency Generator DOM: 2013	150 kW	Caterpillar	D150-8	CAT00C66ALC600121
		275 hp	Caterpillar	C6.6	E6L00768
CR09	Cooling Tower, 3-cell	5,850 gpm	Evapco	USS-312-936	13-541894

1.4.2 Controls

1.4.2.1 Control Devices

No add-on controls have been identified.

1.4.2.2 Control Requirements

Boilers/Water Heaters

1. The permittee shall combust only natural gas in all boilers/heaters. *[Title V OP (03/28/2016)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[Title V OP (03/28/2016)]*
3. The permittee shall operate and maintain the boilers (EUs: CR01 through CR06) with burners that have a manufacturer's maximum emission concentration of 10 ppm NO_x, corrected to 3% oxygen. *[Title V OP (03/28/2016)]*
4. The permittee shall operate and maintain the boilers (EUs: CR01 through CR06) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[Title V OP (03/28/2016)]*

Diesel Generators

5. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generator (EUs: CR07 and CR08). *[40 CFR 60.4207(b)]*
6. The permittee shall operate and maintain all diesel generators in accordance with the manufacturer's O&M manual for emissions-related components. *[Title V OP (03/28/2016)]*

7. The permittee shall ensure that the diesel engines are in compliance with 40 CFR Part 60, Subpart IIII, by meeting of all of the following (EUs: CR07 and CR08): *[40 CFR Part 60.4206]*
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Cooling Towers

8. The permittee shall operate and maintain the cooling tower in accordance with the manufacturer's O&M manual for emissions-related components. *[Title V OP (03/28/2016)]*
9. No chromium-containing compounds shall be used for water treatment. *[40 CFR Part 63.402]*
10. The permittee shall operate the cooling tower with drift eliminators that have a manufacturer's maximum drift rate of 0.001% (EU: CR09). *[Title V OP (03/28/2016)]*
11. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm (EU: CR09). *[Title V OP (12/19/2019)]*

Other

12. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

1.4.3 Limitations and Standards

1.4.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: CR07 and CR08) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: *[40 CFR Part 60.4211]*
 - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.

- c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
- d. The power is provided only to the facility itself or to support the local transmission and distribution system.
- e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

1.4.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-12. *[Title V OP (03/28/2016) and (12/19/2019), Application for Revision of Part 70 OP (05/09/2022), and NSR ATC (02/23/2023)]*

Table 1-12: PTE (tons per year) – The Cromwell Las Vegas

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
CR01	8,760 hr/yr	0.10	0.10	0.16	0.49	0.01	0.07	0.02
CR02	8,760 hr/yr	0.10	0.10	0.16	0.49	0.01	0.07	0.02
CR03	8,760 hr/yr	0.10	0.10	0.16	0.49	0.01	0.07	0.02
CR04	8,760 hr/yr	0.10	0.10	0.16	0.49	0.01	0.07	0.02
CR05	8,760 hr/yr	0.10	0.10	0.16	0.49	0.01	0.07	0.02
CR06	8,760 hr/yr	0.10	0.10	0.16	0.49	0.01	0.07	0.02
CR07	500 hr/yr	0.05	0.05	7.76	1.02	0.01	0.19	0.01
CR08	500 hr/yr	0.02	0.02	0.42	0.09	0.01	0.17	0.01
CR09	8,760 hr/yr	0.30	0.30	0.00	0.00	0.00	0.00	0.00

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

2. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[AQR 26.1]*

1.4.4 Compliance Demonstration Requirements

1.4.4.1 Monitoring

Visible Emissions

See Section 2.0.

Diesel Generators

1. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators (EUs: CR07 and CR08) by retaining a copy of vendor fuel specifications. *[40 CFR 60.4207(b)]*

2. The permittee shall operate each diesel-fired emergency generator engine (EUs: CR07 and CR08) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. [AQR 12.5.2.6(d)]

Cooling Towers

3. The permittee shall monitor the TDS in the cooling tower circulation water monthly. The permittee may use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 12.5.2.6(d)]

1.4.4.2 Testing

No performance testing requirements have been identified for units at The Cromwell Las Vegas at this time.

1.4.4.3 Recordkeeping

1. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EU: CR09);

Emergency Engines

- d. Date and duration of operation of each diesel-fired emergency generator for testing, maintenance, and nonemergency use (EUs: CR07 and CR08) (reported semiannually);
- e. Monthly duration of operation of each emergency generator emergency use, including documentation justifying use during the emergency (EUs: CR07 and CR08) (reported semiannually);
- f. Sulfur content and cetane index or aromatic content of diesel fuel used to power each emergency generator, as certified by the supplier (EUs: CR07 and CR08);

Nonroad Engines

- g. Records of location changes for nonroad engines, if applicable;

Emissions

- h. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);

- i. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
 - j. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
 3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.5 CAESARS PALACE

1.5.1 Emission Units

The stationary source activities at Caesars Palace covered by this Part 70 OP consist of the emission units and associated appurtenances summarized in Table 1-13. [AQR 12.5.2.3; NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, NSR ATC, Modification 10, Revision 0 (12/15/2008); Modification 11, Revision 0 (02/19/2009); NSR ATC, Modification 12, Revision 1 (08/20/2009); Title V OP (03/28/2016) and (09/23/2021); Application for Revision of Part 70 OP (05/09/2022); and NSRATC (02/23/2023)]

Table 1-13: Summary of EUs – Caesars Palace

EU	Description	Rating	Make	Model No.	Serial No.
CP01	Natural Gas Boiler	35.40 MMBtu/hr	Hurst	S4-G-800-150	S4000-150-18
CP02	Natural Gas Boiler	35.40 MMBtu/hr	Hurst	S4-G-800-150	S4000-150-19
CP03	Natural Gas Boiler	33.475 MMBtu/hr	Burnham	3P80050GBNM	12524
CP04	Natural Gas Boiler	33.475 MMBtu/hr	Burnham	3P80050GBNM	12164
CP05	Natural Gas Boiler	33.475 MMBtu/hr	Burnham	3P80050GBNM	12238
CP13	Emergency Generator DOM: 3/5/1997	2,000 kW	Caterpillar	SR-4B	8DM00558
		2,876 hp		3516	6HN00155
CP14	Emergency Generator DOM: 3/3/1997	2,000 kW	Caterpillar	SR-4B	8DM00557
		2,876 hp		3516	6HN00154
CP15	Emergency Generator DOM: 08/14/1996	1,750 kW	Caterpillar	SR-4B	7GM00534
		2,520 hp		3516	25Z05223
CP16	Emergency Generator DOM: 04/18/1995	1,250 kW	Caterpillar	SR4	4DM00503
		1,818 hp		3512	24Z06413

EU	Description	Rating	Make	Model No.	Serial No.
CP17	Emergency Generator DOM: 12/10/1997	2,000 kW	Caterpillar	SR-4B	8DM00625
		2,876 hp		3516	6HN00199
CP19a	Cooling Tower, Cell 1 of 3	10,650 gpm	Baltimore Aircoil	4469-20-3W	92-4G-6184-P4
CP19b	Cooling Tower, Cell 2 of 3	10,650 gpm	Baltimore Aircoil	4469-20-3W	92-4G-6184-P4
CP19c	Cooling Tower, Cell 3 of 3	10,650 gpm	Baltimore Aircoil	4469-20-3W	92-4G-6184-P4
CP20	Cooling Tower	5,750 gpm	Baltimore Aircoil	3725A3	U040665201MAD
CP21	Cooling Tower	5,750 gpm	Baltimore Aircoil	3725A-4	U040665202MAD
CP22	Cooling Tower	5,750 gpm	Baltimore Aircoil	3725A-5	U040665203MAD
CP24	Natural Gas Boiler	1.5 MMBtu/hr	RBI Futera	FW1500	120644885
CP25	Natural Gas Boiler	1.5 MMBtu/hr	RBI Futera	FW1500	120644886
CP26	Natural Gas Boiler	24.0 MMBtu/hr	Unilux	ZF2500W-1-300/400	A1683
CP27	Natural Gas Boiler	24.0 MMBtu/hr	Unilux	ZF2500W-1-300/400	A1684
CP28	Emergency Generator DOM: 2008	2,000 kW	Caterpillar	SR4B HV	G3X00133
		2,937 hp		3516CDITA	SBJ00672
CP29	Emergency Generator DOM: 2008	2,000 kW	Caterpillar	SR4B HV	G3X00229
		2,937 hp		3516CDITA	SBJ00673
CP30a	Cooling Tower	5,600 gpm	Composite Cooling Solutions	FT-2828-75-P6IL	CT-7
CP30b	Cooling Tower	5,600 gpm	Composite Cooling Solutions	FT-2828-75-P6IL	CT-8
CP32	GDO with an AST and nozzles	1,000-gallon	Fireguard	MWCFG	
CP34	Diesel Fire Pump DOM: Post-2006	525 hp	Clarke Fire Pump	JX6H-UF60	FPVT-C084983-002
			John Deere	6125HF070	RG6125H063341
CP35	Diesel Fire Pump DOM: Post-2006	525 hp	Clarke Fire Pump	JX6H-UF60	FPVT-C084983-001
			John Deere	6125HF070	RG6125H063339
CP37	Natural Gas Pool Heater	1.5 MMBtu/hr	RBI Futera II	FW-1500	101984123

1.5.2 Controls

1.5.2.1 Control Devices

No add-on controls have been identified.

1.5.2.2 Control Requirements

Boilers/Water Heaters [AQR 12.5.2.12]

1. The permittee shall combust only natural gas in all boilers/heaters. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
3. The permittee shall operate and maintain the 35.4 MMBtu/hr boilers (EUs: CP01 and CP02) with burners that have a manufacturer's maximum emission concentration of 29 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*
4. The permittee shall operate and maintain the 35.4 MMBtu/hr boilers (EUs: CP01 and CP02) with burners that have a manufacturer's maximum emission concentration of 10 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*
5. The permittee shall operate and maintain the 33.475 MMBtu/hr boilers (EUs: CP03 through CP05) with burners that have a manufacturer's maximum emission concentration of 30 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
6. The permittee shall operate and maintain the 33.475 MMBtu/hr boilers (EUs: CP03 through CP05) with burners that have a manufacturer's maximum emission concentration of 10 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
7. The permittee shall operate and maintain the 1.50 MMBtu/hour boilers (EUs: CP24 and CP25) with burners that have a manufacturer's maximum emission concentration of 10 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
8. The permittee shall operate and maintain the 1.50 MMBtu/hour boilers (EUs: CP24 and CP25) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
9. The permittee shall operate and maintain the two 24.0 MMBtu/hr boilers (EUs: CP26 and CP27) with burners that have a manufacturer's maximum emission concentration of 9 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*
10. The permittee shall operate and maintain the two 24.0 MMBtu/hr boilers (EUs: CP26 and CP27) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*
11. The permittee shall operate and maintain the 1.5 MMBtu/hr boiler (EU: CP37) with burners that have a manufacturer's maximum emission concentration of 10 ppm NO_x, corrected to 3% oxygen. *[AQR 12.5.2.6]*
12. The permittee shall operate and maintain the 1.5 MMBtu/hr boiler (EU: CP37) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[AQR 12.5.2.6]*

Diesel Generators/Fire Pumps

13. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generator (EUs: CP13 through CP17, CP28, CP29, CP34, and CP35). [40 CFR 63.6604(b)]
14. The permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's O&M manual for emissions-related components. [NSR ATC, Modification 10, Revision 0 (12/15/2008)]
15. The permittee shall ensure that the diesel engines are in compliance with 40 CFR Part 60, Subpart III, by meeting of all of the following (EUs: CP28, CP29, CP34, and CP35): [40 CFR Part 60.4206]
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Cooling Towers

16. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. No chromium-containing compounds shall be used for water treatment. [40 CFR Part 63.402]
17. The permittee shall operate the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.005% (EUs: CP19a through CP22). [NSR ATC, Modification 10, Revision 0 (12/15/2008)]
18. The permittee shall operate the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.001% (EUs: CP30a and CP30b). [NSR ATC, Modification 7, Revision 0 (01/29/2008)]
19. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm. [Title V OP (12/19/2019)]

Gasoline Dispensing

20. The permittee shall implement control technology requirements on gasoline dispensing equipment (EU: CP32). [40 CFR Part 63, Subpart CCCCCC]
21. The permittee shall install and operate all Phase I vapor recovery equipment according to certifications specified by the manufacturer, and shall maintain the equipment to be leak-free, vapor-tight, and in proper working order. [AQR 12.5.2.6]
22. From October 1 to March 31 every year in the Las Vegas Valley, the Eldorado Valley, the Ivanpah Valley, the Boulder City limits, and any area within three miles of these areas, no gasoline intended as a final product for fueling motor vehicles shall be supplied or sold by any person; sold at retail; sold to a private or a municipal fleet for consumption; or introduced into any motor vehicle by any person unless the gasoline has at least 3.5 percent oxygen content by weight. [AQR 53.1.1 & 53.2.1]

23. If a gasoline storage tank in the Las Vegas Valley, the Eldorado Valley, the Ivanpah Valley, the Boulder City limits, and any area within three miles of these areas, receives its last gasoline delivery with less than 3.5 percent oxygen content by weight before September 15, gasoline dispensed from that tank will be exempt from enforcement of AQR Section 53.2.1 until the first delivery date after October 1. *[AQR 53.5.1.1]*
24. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Preventative measures to be taken include, but are not limited to, the following: *[40 CFR Parts 63.11116 and 63.11117]*
 - a. Minimize gasoline spills;
 - b. Clean up spills as expeditiously as practicable;
 - c. Cover all open gasoline containers and all gasoline storage tank fill pipes with a gasketed seal when not in use; and
 - d. Only load gasoline into storage tanks using a submerged fill tube where the greatest distance from the bottom of the storage tank to the point of the fill tube opening is no more than six inches.
25. The permittee shall install, maintain, and operate a Phase I vapor recovery system on all gasoline storage tanks (EU: CP32) that meets the following requirements: *[AQR 12.5.2.6]*
 - a. The Phase I vapor recovery system shall be rated with at least 90.0 percent control efficiency when in operation. This system shall be certified by an industry-recognized certification body, i.e., California Resources Air Board (CARB) or equivalent.
 - b. The Phase I vapor recovery system shall be a dual-point vapor balance system, as defined by 40 CFR Part 63.11132, in which the storage tank is equipped with an entry port for a gasoline fill pipe and a separate exit port for a vapor connection.
 - c. All Phase I vapor recovery equipment shall be installed and operated in accordance with manufacturer specifications and certification requirements.
 - d. All Phase I vapor recovery equipment, including the vapor line from the gasoline storage tanks to the gasoline cargo tank, shall be maintained in good working order and vapor-tight, as defined in 40 CFR Part 63.11132.
 - e. All vapor connections and lines on storage tanks shall be equipped with closures that seal upon disconnect.
26. The vapor balance system shall be designed so that the pressure in the cargo tank does not exceed 18 inches of water pressure or 5.9 inches of water vacuum during product transfer.
27. Liquid fill and vapor return adapters for all systems shall be equipped and secured with vapor-tight caps after each delivery. *[AQR 12.5.2.6]*
28. A pressure/vacuum (PV) vent valve on each gasoline storage tank system (EU: CP32) shall be installed, maintained, and operated in accordance with manufacturer's specifications.

- a. The pressure specifications for PV vent valves shall be a positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water.
 - b. The total leak rate of all PV vent valves at the affected facility, including connections, shall not exceed 0.17 ft³ per hour at a pressure of 2.0 inches of water and 0.63 ft³ per hour at a vacuum of 4 inches of water. *[AQR 12.5.2.6]*
29. The vapor balance system shall be capable of meeting the static pressure performance requirement in 40 CFR Part 63, Subpart CCCCC. *[AQR 12.5.2.6]*
30. The permittee shall comply with good management practices during the unloading of gasoline cargo tanks, as follows: *[AQR 12.5.2.6]*
- a. All hoses in the vapor balance system shall be properly connected.
 - b. The adapters or couplers that attach to the vapor line on the storage tank shall have closures that seal upon disconnect.
 - c. All vapor return hoses, couplers, and adapters used in the gasoline delivery shall be vapor-tight.
 - d. All tank truck vapor return equipment shall be compatible in size and form a vapor-tight connection with the vapor balance equipment on the gasoline storage tank.
 - e. All hatches on the tank truck shall be closed and securely fastened.
 - f. The filling of storage tanks shall be limited to unloading from vapor-tight gasoline cargo tanks carrying documentation onboard that the cargo tank has met the specifications of EPA Test Method 27.

Other

31. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

1.5.3 Limitations and Standards

1.5.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: CP13 through CP17, CP28, and CP29) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: *[40 CFR Part 60.4211 and 40 CFR Part 63.6640]*
 - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.

- b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
2. The permittee shall limit the operation of the fire pumps (EUs: CP34 and CP35) for testing and maintenance purposes to 100 hours/year. The permittee may operate the fire pumps up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR Part 60.4211]*
 3. The permittee shall limit the maximum throughput of all gasoline products to 18,000 gallons per any consecutive 12 months (EU: CP32). *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

1.5.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-14. *[NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, NSR ATC, Modification 10, Revision 0 (12/15/2008); Modification 11, Revision 0 (02/19/2009); NSR ATC, Modification 12, Revision 1 (08/20/2009); Title V OP (03/28/2016), (12/19/2019), and (09/23/2021); Application for Revision of Part 70 OP (05/09/2022); and NSR ATC (02/23/2023)]*

Table 1-14: PTE (tons per year) – Caesars Palace

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
CP01	8,760 hr/yr	1.16	1.16	5.46	1.15	0.09	0.84	0.29
CP02	8,760 hr/yr	1.16	1.16	5.46	1.15	0.09	0.84	0.29
CP03	8,760 hr/yr	1.10	1.10	5.35	1.08	0.09	0.79	0.28
CP04	8,760 hr/yr	1.10	1.10	5.35	1.08	0.09	0.79	0.28
CP05	8,760 hr/yr	1.10	1.10	5.35	1.08	0.09	0.79	0.28
CP13	500 hr/yr	0.50	0.50	17.26	3.96	0.01	0.51	0.02
CP14	500 hr/yr	0.50	0.50	17.26	3.96	0.01	0.51	0.02
CP15	500 hr/yr	0.44	0.44	15.12	3.47	0.01	0.44	0.02
CP16	500 hr/yr	0.32	0.32	10.91	2.50	0.01	0.32	0.01
CP17	500 hr/yr	0.50	0.50	17.26	3.96	0.01	0.51	0.02
CP19a	8,760 hr/yr	2.76	2.76	0.00	0.00	0.00	0.00	0.00
CP19b	8,760 hr/yr	2.76	2.76	0.00	0.00	0.00	0.00	0.00

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
CP19c	8,760 hr/yr	2.76	2.76	0.00	0.00	0.00	0.00	0.00
CP20	8,760 hr/yr	1.49	1.49	0.00	0.00	0.00	0.00	0.00
CP21	8,760 hr/yr	1.49	1.49	0.00	0.00	0.00	0.00	0.00
CP22	8,760 hr/yr	1.49	1.49	0.00	0.00	0.00	0.00	0.00
CP24	8,760 hr/yr	0.05	0.05	0.08	0.24	0.01	0.04	0.01
CP25	8,760 hr/yr	0.05	0.05	0.08	0.24	0.01	0.04	0.01
CP26	8,760 hr/yr	0.79	0.79	1.15	3.89	0.06	0.57	0.2
CP27	8,760 hr/yr	0.79	0.79	1.15	3.89	0.06	0.57	0.2
CP28	500 hr/yr	0.06	0.06	10.62	0.87	0.01	0.23	0.01
CP29	500 hr/yr	0.06	0.06	10.62	0.87	0.01	0.23	0.01
CP30a	8,760 hr/yr	0.29	0.29	0.00	0.00	0.00	0.00	0.00
CP30b	8,760 hr/yr	0.29	0.29	0.00	0.00	0.00	0.00	0.00
CP32	18,000 gal/yr	0.00	0.00	0.00	0.00	0.00	0.15	0.01
CP34	500 hr/yr	0.02	0.02	1.35	0.08	0.01	0.04	0.01
CP35	500 hr/yr	0.02	0.02	1.35	0.08	0.01	0.04	0.01
CP37	8,760 hr/yr	0.05	0.05	0.08	0.24	0.01	0.04	0.01

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

- The permittee shall not allow actual emissions from the individual emission units to exceed the emission rates and emission concentrations listed in Table 1-15. [AQR 12.5.2.3]

Table 1-15: Emissions – Caesars Palace

EU	Rating	NO _x /CO (ppm) ¹	NO _x (lbs/hr)	CO (lbs/hr)
CP01	35.4 MMBtu/hr	NO _x 29/CO 10	1.24	0.26
CP02	35.4 MMBtu/hr	NO _x 29/CO 10	1.24	0.26
CP03	33.475 MMBtu/hr	NO _x 30/CO 10	1.23	0.25
CP04	33.475 MMBtu/hr	NO _x 30/CO 10	1.23	0.25
CP05	33.475 MMBtu/hr	NO _x 30/CO 10	1.23	0.25
CP26	24.0 MMBtu/hr	NO _x 9/CO 50	0.26	0.89
CP27	24.0 MMBtu/hr	NO _x 9/CO 50	0.26	0.89

¹Corrected to 3% oxygen.

- The permittee shall not discharge into the atmosphere, from any emission unit in this section, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. [AQR 26.1]

1.5.4 Compliance Demonstration Requirements

1.5.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

1. The permittee shall install and utilize nonresettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: CP01 through CP05, CP26, and CP27). [AQR 12.5.2.6(d) and 40 CFR Part 60.48c(g)(1)]
2. The permittee shall perform a burner efficiency test twice each calendar year, at least five months apart but no more than seven (EUs: CP01 through CP05, CP26, and CP27). [AQR 12.5.2.6(d)]
3. The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: CP01 through CP05, CP26, and CP27). [AQR 12.5.2.6(d)]
4. The permittee may perform a burner efficiency test once each calendar year if the actual hours of operation are less than 50. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: CP01 through CP05, CP26, and CP27). [AQR 12.5.2.6(d)]
5. The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: CP01 through CP05, CP26, and CP27). [AQR 12.5.2.6(d)]

Diesel Generators/Fire Pumps

6. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generator and fire pump (EUs: CP13 through CP17, CP28, CP29, CP34, and CP35) by retaining a copy of vendor fuel specifications. [40 CFR 60.4207(b) and 40 CFR 63.6604(b)]
7. The permittee shall operate each diesel-fired emergency generator engine and fire pump (EUs: CP13 through CP17, CP28, CP29, CP34, and CP35) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. [AQR 12.5.2.6(d)]

Cooling Towers

8. The permittee shall monitor the TDS in the cooling tower circulation water monthly. The permittee may use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS. [AQR 12.5.2.6(d)]

Gasoline Dispensing

9. The permittee shall monitor the combined throughput of gasoline each month (EU: CP32). [AQR 12.5.2.6(d)]
10. The permittee shall monitor the fuel storage and dispensing system (EU: CP32) to determine if components of the system are in compliance with the control requirements of this permit. The monitoring shall consist of, but not be limited to, the following: [40 CFR Part 63.11125]
 - a. The permittee shall inspect daily for gasoline spills, and record the times and dates the source became aware of a spill and cleaned it up.

- b. The permittee shall inspect covers on gasoline containers and fill-pipes after each delivery, and record the dates of fuel deliveries and corresponding inspections.
- c. The permittee shall record the date and approximate volume of gasoline sent to open waste collection systems that collect recyclable gasoline.

1.5.4.2 Testing

- 1. Performance testing shall be the instrument for determining compliance with the emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: CP01 through CP05, CP26, and CP27). *[AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]*
- 2. The permittee shall conduct performance tests on each boiler (EUs: CP01 through CP05, CP26, and CP27) every five years, and no later than 90 days after the anniversary date of the last performance test. *[AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]*

Table 1-16: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Stack Gas Parameters	—	EPA Methods 1, 2, 3A, and 4

Gasoline Dispensing

- 3. The permittee shall conduct Phase I vapor recovery tests in accordance with the CARB-approved vapor recovery test procedures (as revised) listed in Table 1-17, as applicable. *[AQR 12.5.2.8(a)]*

Table 1-17: Vapor Recovery System Testing Procedures and Schedules

Type of Vapor Recovery System	Test Procedure	Frequency
Phase I Vapor Balance System	Pressure Decay/Leak test: TP201.3B (as revised for AST)	Initial and every three years thereafter
	Static Torque of Rotatable Phase I Adaptors CARB procedure TP-201.1B (With swivel adaptors only)	Initial and every three years thereafter
	Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves: CARB procedure TP-201.1E (as revised)	Initial and every three years thereafter
	Flow rate Test: CC_V RTP_1	Initial and every three years thereafter

- 4. The permittee shall submit, by mail, fax, or hand delivery, a DAQ-approved vapor recovery test notification form (available on the DAQ website) to schedule each vapor recovery test with the Stationary Sources Section supervisor at least 30 calendar days before the anticipated date of testing, unless otherwise specified in this permit. *[AQR 12.5.2.8(a)]*
- 5. Any prior approved scheduled vapor recovery system test cannot be canceled and/or rescheduled without the Control Officer’s prior approval. *[AQR 12.5.2.8(a)]*

6. The permittee shall conduct Phase I vapor recovery system testing on affected gasoline dispensing equipment according to the following requirements: *[AQR 12.5.2.8(a)]*
 - a. The permittee shall conduct and pass an initial vapor recovery system test within 180 days of startup of new equipment, or within 90 days after completion of repairs or reconstruction where the integrity of the vapor recovery system has been affected by the repair or reconstruction. Routine maintenance, including the replacement of hoses, nozzles, and efficiency compliance devices (e.g., bellows, face shield, splash guard, etc.), does not require an initial vapor recovery system test.
 - b. The permittee shall conduct and pass subsequent Phase I vapor recovery system tests on or before the anniversary date of the previous successful test at the frequency specified in Table 1-17.
 - c. Each vapor recovery system test may be witnessed by a DAQ inspector.
7. The permittee shall submit a Gasoline Dispensing Operation Certification of Vapor Recovery System Test Results Submittal Form (available on the DAQ website), along with associated test results, to the Control Officer after each vapor recovery system test. The submittal form shall be: *[AQR 12.5.2.8(a)]*
 - a. Complete and signed by the Responsible Official for the equipment being tested. The Responsible Official must certify that the test results are true, accurate, and complete.
 - b. Submitted by mail, by fax, or in person.
 - c. Submitted by the source, or by the permittee's testing company or consultant. However, the source is the responsible party and must ensure that the test report is delivered to DAQ within the applicable time frame.
8. If the source passes or fails the vapor recovery system test, the permittee shall submit the test results report to the Control Officer within 60 days of the date of the vapor recovery system test.
9. If the source fails a vapor recovery system test: *[Clark County Department of Air Quality Source Testing Guidelines (9/19/2019)]*
 - a. The permittee shall notify the Control Officer, by email or phone, within 24 hours of equipment test failure. If repairs can be made within five working days of the original scheduled test date, the permittee shall make the repairs and pass the required test(s).
 - b. If the equipment cannot be repaired in five working days, the permittee shall make all necessary repairs and schedule a retest of the affected facility by submitting a new Test Notification Form to the Control Officer by mail, fax, or hand delivery no later than three business days before the new test date.
 - c. After retesting (pass/fail), the owner/operator shall submit a Test Results Submittal Form (available on the DAQ website) and supporting test documents to the Control Officer within 15 days of completion.
 - d. The permittee shall continue retesting until the affected facility successfully passes all aspects of the vapor recovery system test.

10. The Control Officer may require the permittee to conduct any test after a failed vapor recovery system test in the presence of a DAQ representative. [AQR 12.5.2.8(a)]

1.5.4.3 Recordkeeping

1. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EUs: CP19a through CP22, CP30a, and CP30b);

Boilers/Water Heater

- d. Monthly natural gas fuel consumed by each boiler (EUs: CP01 through CP05, CP26, and CP27) (reported semiannually);
- e. Burner efficiency test results (EUs: CP01 through CP05, CP26, and CP27);

Emergency Engines

- f. Date and duration of operation of each diesel-fired emergency generator and each fire pump for testing, maintenance, and nonemergency use (EUs: CP13 through CP17, CP28, CP29, CP34, and CP35) (reported semiannually);
- g. Monthly duration of operation of each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency (EUs: CP13 through CP17, CP28, CP29, CP34, and CP35) (reported semiannually);
- h. Sulfur content and cetane index or aromatic content of diesel fuel used to power each emergency generator and fire pump, as certified by the supplier (EUs: CP13 through CP17, CP28, CP29, CP34, and CP35);

Gasoline Dispensing Inspections/Maintenance/General (EU: CP32)

- i. Equipment inspections, including findings and corrective actions;
- j. Maintenance on storage and distribution equipment, including a general description of location(s) and part(s);
- k. Date and time that storage and distribution equipment was taken out of service;
- l. Date of repair or replacement of storage and distribution equipment/parts;

- m. Daily total combined throughput of gasoline;
- n. Monthly combined total throughput of gasoline (reported semiannually);

Nonroad Engines

- o. Records of location changes for nonroad engines, if applicable;

Emissions

- p. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
 - q. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
 - r. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
2. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
 3. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.6 PARIS LAS VEGAS

1.6.1 Emission Units

The stationary source activities at Paris Las Vegas, covered by this Part 70 OP, consist of the emission units and associated appurtenances summarized in Table 1-18. [AQR 12.5.2.3; NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1, (08/20/2009); NSR ATC, Modification 14, (10/09/2009); NSR ATC, Modification 15, Revision 0 (03/20/2010); NSR ATC (02/23/2023); Title V 70 OP (05/29/2013), (03/28/2016), (12/19/2019), and (09/23/2021)]

Table 1-18: Summary of EUs – Paris Las Vegas

EU	Description	Rating	Make	Model No.	Serial No.
PA12	Natural Gas Boiler #4	3.5 MMBtu/hr	Bryan	RV350S-150- FDG-LX	81362
PA13	Natural Gas Boiler #5	3.5 MMBtu/hr	Bryan	RV350S-150- FDG-LX	81349
PA14	Natural Gas Boiler #3	17.0 MMBtu/hr	Bryan	RW1700W-FDG- LX	81458
PA15	Natural Gas Boiler #1	21.0 MMBtu/hr	Bryan	RW2100W-FDG- LX	81444
PA16	Natural Gas Boiler #2	21.0 MMBtu/hr	Bryan	RW2100W-FDG- LX	81457

EU	Description	Rating	Make	Model No.	Serial No.
PA17	Emergency Generator #1 DOM: 03/25/1998	2,100kW	Cummins	QSW73	79652
		2,816 hp		CW73-G	66300058
PA18	Emergency Generator #2 DOM: 02/26/1998	2,100kW	Cummins	QSW73	79651
		2,816 hp		CW73-G	66300040
PA19	2-Cell Cooling Tower #1	4,725 gpm	Baltimore Aircoil	33758-2W	97221981 & 97222002
PA20	2-Cell Cooling Tower #2	4,725 gpm	Baltimore Aircoil	33758-2W	97222011 & 97222001
PA21	2-Cell Cooling Tower #3	4,725 gpm	Baltimore Aircoil	33758-2W	97222021 & 97221992
PA22	2-Cell Cooling Tower #4	4,725 gpm	Baltimore Aircoil	33758-2W	97221991 & 97222012
PA23	2-Cell Cooling Tower #5	4,725 gpm	Baltimore Aircoil	33758-2W	97222022 & 97221982
PA28	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	0409522881
PA29	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	092086486
PA30	Natural Gas Pool Heater	1.95 MMBtu/hr	RBI Futera II	FW1950	092086497
PA31	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	071983421
PA32	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	021261112
PA33	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	121160719
PA34	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	011260847
PA35	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	021982198
PA36	Natural Gas Boiler	1.95 MMBtu/hr	RBI Futera II	FW1950	051570836
PA37	Diesel Engine Emergency Generator DOM: Pre-2006	2,000 kW	Caterpillar	SR4B	4FN01705
		2,848 hp		3516	1HZ00515

1.6.2 Controls

1.6.2.1 Control Devices

No add-on controls have been identified.

1.6.2.2 Control Requirements

Boilers/Water Heaters

- The permittee shall combust only natural gas in all boilers/heaters. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
3. The permittee shall operate and maintain the 3.5 MMBtu/hour boilers (EUs: PA12 and PA13) with burners that have a manufacturer's maximum emission concentration of 26 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
4. The permittee shall operate and maintain the 3.5 MMBtu/hour boilers (EUs: PA12 and PA13) with burners that have a manufacturer's maximum emission concentration of 111 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
5. The permittee shall operate and maintain the 17.0 MMBtu/hr boiler (EU: PA14) with burners that have a manufacturer's maximum emission concentration of 30 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
6. The permittee shall operate and maintain the 17.0 MMBtu/hr boiler (EU: PA14) with burners that have a manufacturer's maximum emission concentration of 114 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
7. The permittee shall operate and maintain the 21.0 MMBtu/hr boilers (EUs: PA15 and PA16) with burners that have a manufacturer's maximum emission concentration of 30 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
8. The permittee shall operate and maintain the 21.0 MMBtu/hr boilers (EUs: PA15 and PA16) with burners that have a manufacturer's maximum emission concentration of 114 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
9. The permittee shall operate and maintain the 1.95 MMBtu/hr boilers (EUs: PA28 through PA34) with burners that have a manufacturer's maximum emission concentration of 10 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 15, Revision 0 (03/20/2010)]*
10. The permittee shall operate and maintain the 1.95 MMBtu/hr boilers (EUs: PA28 through PA34) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 15, Revision 0 (03/20/2010)]*
11. The permittee shall operate and maintain the 1.95 MMBtu/hr boiler (EU: PA35) with burners that have a manufacturer's maximum emission concentration of 10 ppm NO_x, corrected to 3% oxygen. *[Title V OP (12/19/2019)]*

Diesel Generators [AQR 12.5.2.6]

12. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generators (EUs: PA17, PA18, and PA37). *[40 CFR 63.6604(b)]*
13. The permittee shall operate and maintain all diesel generators in accordance with the manufacturer's O&M manual for emissions-related components. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*

Cooling Towers

14. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. No chromium-containing compounds shall be used for water treatment. [40 CFR Part 63.402]
15. The permittee shall operate each of the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.005% (EUs: PA19 through PA23). [NSR ATC, Modification 10, Revision 0 (12/15/2008)]
16. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm. [Title V OP (12/19/2019)]

Other

17. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. [AQR 40 & AQR 43]

1.6.3 Limitations and Standards

1.6.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: PA17, PA18, and PA37) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: [40 CFR Part 63.6640]
 - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

1.6.3.2 Emission Limits

- The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-19. [NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1, (08/20/2009); NSR ATC, Modification 14, (10/09/2009); NSR ATC, Modification 15, Revision 0 (03/20/2010); NSR ATC (02/23/2023); and Title V 70 OP (05/29/2013), (03/28/2016), and (12/19/2019)]

Table 1-19: PTE (tons per year) – Paris Las Vegas

EU	Conditions ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
PA12	8,760 hr/yr	0.11	0.11	0.48	1.26	0.01	0.08	0.03
PA13	8,760 hr/yr	0.11	0.11	0.48	1.26	0.01	0.08	0.03
PA14	8,760 hr/yr	0.56	0.56	2.72	6.28	0.04	0.40	0.14
PA15	8,760 hr/yr	0.69	0.69	3.36	7.75	0.06	0.50	0.17
PA16	8,760 hr/yr	0.69	0.69	3.36	7.75	0.06	0.50	0.17
PA17	500 hr/yr	0.49	0.49	16.90	3.87	0.01	0.50	0.02
PA18	500 hr/yr	0.49	0.49	16.90	3.87	0.01	0.50	0.02
PA19	8,760 hr/yr	1.23	1.23	0.00	0.00	0.00	0.00	0.00
PA20	8,760 hr/yr	1.23	1.23	0.00	0.00	0.00	0.00	0.00
PA21	8,760 hr/yr	1.23	1.23	0.00	0.00	0.00	0.00	0.00
PA22	8,760 hr/yr	1.23	1.23	0.00	0.00	0.00	0.00	0.00
PA23	8,760 hr/yr	1.23	1.23	0.00	0.00	0.00	0.00	0.00
PA28	8,760 hr/yr	0.06	0.06	0.10	0.32	0.01	0.05	0.02
PA29	8,760 hr/yr	0.06	0.06	0.10	0.32	0.01	0.05	0.02
PA30	8,760 hr/yr	0.06	0.06	0.10	0.32	0.01	0.05	0.02
PA31	8,760 hr/yr	0.06	0.06	0.10	0.32	0.01	0.05	0.02
PA32	8,760 hr/yr	0.06	0.06	0.10	0.32	0.01	0.05	0.02
PA33	8,760 hr/yr	0.06	0.06	0.10	0.32	0.01	0.05	0.02
PA34	8,760 hr/yr	0.06	0.06	0.10	0.32	0.01	0.05	0.02
PA35	8,760 hr/yr	0.06	0.06	0.10	0.70	0.01	0.05	0.02
PA36	8,760 hr/yr	0.06	0.06	0.84	0.70	0.01	0.05	0.02
PA37	500 hr/yr	0.11	0.11	14.91	1.73	0.01	0.41	0.01

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

- The permittee shall not allow actual emissions from the individual emission units to exceed the emission rates and emission concentrations listed in Table 1-20. [Title V OP (05/29/2013)]

Table 1-20: Emissions – Paris Las Vegas

EU	Rating	NO _x /CO (ppm) ¹	NO _x (lbs/hr)	CO (lbs/hr)
PA14	17.0 MMBtu/hr	NO _x 30/CO 114	0.62	1.44
PA15	21.0 MMBtu/hr	NO _x 30/CO 114	0.77	1.78
PA16	21.0 MMBtu/hr	NO _x 30/CO 114	0.77	1.78

¹Corrected to 3% oxygen.

3. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[AQR 26.1]*

1.6.4 Compliance Demonstration Requirements

1.6.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

1. The permittee shall install and utilize nonresettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: PA14, PA15, and PA16). *[AQR 12.5.2.6(d) and 40 CFR Part 60.48c(g)(1)]*
2. The permittee shall perform a burner efficiency test twice each calendar year, at least five months apart but no more than seven (EUs: PA14, PA15, and PA16). *[AQR 12.5.2.6(d)]*
3. The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: PA14, PA15, and PA16). *[AQR 12.5.2.6(d)]*
4. The permittee may perform a burner efficiency test once each calendar year if the actual hours of operation are less than 50. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: PA14, PA15, and PA16). *[AQR 12.5.2.6(d)]*
5. The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: PA14, PA15, and PA16). *[AQR 12.5.2.6(d)]*

Diesel Generators

6. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators (EUs: PA17, PA18, and PA37) by retaining a copy of vendor fuel specifications. *[40 CFR 63.6604(b)]*
7. The permittee shall operate each diesel-fired emergency generator engine (EUs: PA17 and PA18) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. *[AQR 12.5.2.6(d)]*

Cooling Towers

8. The permittee shall monitor the TDS in the cooling tower circulation water monthly. The permittee shall use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS. *[AQR 12.5.2.6(d)]*

1.6.4.2 Testing

1. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: PA14, PA15, and PA16). *[AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]*
2. The permittee shall conduct performance tests on each boiler (EUs: PA14, PA15, and PA16) every five years, and no later than 90 days after the anniversary date of the last performance test. *[AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]*

Table 1-21: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Stack Gas Parameters	—	EPA Methods 1, 2, 3A, and 4

1.6.4.3 Recordkeeping

3. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer’s authorized representative upon request and without prior notice during the permittee’s hours of operation: *[AQR 12.5.2.6(d)(2)]*

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EUs: PA19 through PA23);

Boilers/Water Heater

- d. Monthly natural gas fuel consumed by each boiler (EUs: PA14, PA15, and PA16) (reported semiannually);
- e. Burner efficiency test results (EUs: PA14, PA15, and PA16);

Emergency Engines

- f. Date and duration of operation of each diesel-fired emergency generator (EUs: PA17, PA18, and PA37) for testing, maintenance, and nonemergency use (reported semiannually);
- g. Monthly duration of operation of each emergency generator (EUs: PA17, PA18, and PA37) for emergency use, including documentation justifying use during the emergency (reported semiannually);

- h. Sulfur content and cetane index or aromatic content of diesel fuel used to power the emergency generators (EUs: PA17, PA18, and PA37), as certified by the supplier;

Nonroad Engines

- i. Records of location changes for nonroad engines, if applicable;

Emissions

- j. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
 - k. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
 - l. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
4. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
5. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.7 THE LINQ HOTEL & CASINO

1.7.1 Emission Units

The stationary source activities at The LINQ Hotel & Casino covered by this Part 70 OP consist of the emission units and associated appurtenances summarized in Table 1-22. [AQR 12.5.2.3; NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1, (08/20/2009); and Title V OP (03/28/2016) and (09/23/2021)]

Table 1-22: Summary of EUs – The LINQ Hotel & Casino

EU	Description	Rating	Make	Model No.	Serial No.
IP01	Natural Gas Boiler	1.25 MMBtu/hr	Ajax	WG-1250 D	82-34510
IP02	Natural Gas Boiler	1.25 MMBtu/hr	Ajax	WG-1250 D	82-34507
IP03	Natural Gas Boiler	1.25 MMBtu/hr	Ajax	WG-1250 D	82-34502
IP04	Natural Gas Boiler	16.738 MMBtu/hr	Kewanee	H3S 400HP	R8190
IP05	Natural Gas Boiler	16.738 MMBtu/hr	Kewanee	H3S 400-G0	R8191
IP06	Emergency Generator DOM: Pre-2006	470 kW	Caterpillar	SR4	6EA00547
		680 hp		3412	81Z01351

EU	Description	Rating	Make	Model No.	Serial No.
IP07	Emergency Generator DOM: Pre-2006	500 kW	Caterpillar	SR4	5NA05002
		755 hp		3412	81Z04033
IP08	Emergency Generator DOM: Pre-2006	600 kW	Caterpillar	SR4	6FA04856
		890 hp		3412	81Z07511
IP09	Emergency Generator DOM: Pre-2006	600 kW	Caterpillar	SR4	6FA05404
		890 hp		3412	81Z08595
IP10	Emergency Generator DOM: Pre-2006	280 kW	E.M. Generator	7083-7305	263120414
		375 hp	Detroit		
IP11	Emergency Generator DOM: Pre-2006	500 kW	Marathon Electric	580FDF4036FFPD1W	JB-95613
		670 hp	Detroit	71637305	16VA015737
IP38	Emergency Generator DOM: 2019	500 kW	Caterpillar	LC6	G6B25666
		762 hp	Caterpillar	C15	FTE04081

1.7.2 Controls

1.7.2.1 Control Devices

No add-on controls have been identified.

1.7.2.2 Control Requirements

Boilers/Water Heaters [AQR 12.5.2.6]

1. The permittee shall combust only natural gas in all boilers/heaters. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
3. The permittee shall operate and maintain the 1.25 MMBtu/hr boilers (EUs: IP01 through IP03) with burners that have a manufacturer's maximum emission concentration of 40.2 ppm NO_x, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
4. The permittee shall operate and maintain the 1.25 MMBtu/hr boilers (EUs: IP01 through IP03) with burners that have a manufacturer's maximum emission concentration of 110.5 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
5. The permittee shall operate and maintain the 16.738 MMBtu/hr boilers (EUs: IP04 and IP05) with burners that have a manufacturer's maximum emission concentration of 40.2 ppm NO_x, corrected to 3% oxygen, and FGR control devices. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*
6. The permittee shall operate and maintain the 16.738 MMBtu/hr boilers (EUs: IP04 and IP05) with burners that have a manufacturer's maximum emission concentration of 100 ppm CO, corrected to 3% oxygen. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*

Diesel Generators

7. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generators (EUs: IP06 through IP11 and IP38). *[40 CFR 63.6604(b)]*
8. The permittee shall operate and maintain all diesel generators and fire pumps in accordance with the manufacturer's O&M manual for emissions-related components. *[NSR ATC, Modification 10, Revision 0 (12/15/2008)]*
9. The permittee shall ensure that the diesel engine is in compliance with 40 CFR Part 60, Subpart III, by meeting all of the following (EU: IP38): *[40 CFR Part 60.4206]*
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Other

10. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

1.7.3 Limitations and Standards

1.7.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: IP06 through IP11 and IP38) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: *[40 CFR Part 60.4211 and 40 CFR Part 63.6640]*
 - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system.

- e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

1.7.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-23. *[NSR ATC, Modification 7, Revision 0 (01/29/2008); NSR ATC, Modification 10, Revision 0 (12/15/2008); NSR ATC, Modification 12, Revision 1, (08/20/2009); and Title V OP (03/28/2016) and (09/23/2021)]*

Table 1-23: PTE (tons per year) – The LINQ Hotel & Casino

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
IP01	8,760 hr/yr	0.04	0.04	0.27	0.45	0.01	0.03	0.01
IP02	8,760 hr/yr	0.04	0.04	0.27	0.45	0.01	0.03	0.01
IP03	8,760 hr/yr	0.04	0.04	0.27	0.45	0.01	0.03	0.01
IP04	8,760 hr/yr	0.55	0.55	3.58	5.43	0.04	0.40	0.14
IP05	8,760 hr/yr	0.55	0.55	3.58	5.43	0.04	0.40	0.14
IP06	500 hr/yr	0.12	0.12	4.08	0.94	0.01	0.12	0.01
IP07	500 hr/yr	0.13	0.13	4.53	1.04	0.01	0.13	0.01
IP08	500 hr/yr	0.16	0.16	5.34	1.22	0.01	0.16	0.01
IP09	500 hr/yr	0.16	0.16	5.34	1.22	0.01	0.16	0.01
IP10	500 hr/yr	0.21	0.21	2.91	0.63	0.01	0.24	0.01
IP11	500 hr/yr	0.12	0.12	4.02	0.92	0.01	0.12	0.01
IP38	500 hr/yr	0.02	0.02	2.07	0.49	0.01	0.02	0.01

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

2. The permittee shall not allow actual emissions from the individual emission units to exceed the emission rates and emission concentrations listed in Table 1-24. *[NSR ATC, Modification 7, Revision 0 (01/29/2008)]*

Table 1-24: Emissions – The LINQ Hotel & Casino

EU	Rating	NO _x /CO (ppm) ¹	NO _x (lbs/hr)	CO (lbs/hr)
IP04	16.738 MMBtu/hr	NO _x 40.2/CO 100	0.82	1.24
IP05	16.738 MMBtu/hr	NO _x 40.2/CO 100	0.82	1.24

¹Corrected to 3% oxygen.

3. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[AQR 26.1]*

1.7.4 Compliance Demonstration Requirements

1.7.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

1. The permittee shall install and utilize nonresettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: IP04 and IP05). *[AQR 12.5.2.6(d) and 40 CFR Part 60.48c(g)(1)]*
2. The permittee shall perform a burner efficiency test twice each calendar year, at least five months apart but no more than seven (EUs: IP04 and IP05). *[AQR 12.5.2.6(d)]*
3. The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: IP04 and IP05). *[AQR 12.5.2.6(d)]*
4. The permittee may perform a burner efficiency test once each calendar year if the actual hours of operation are less than 50. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: IP04 and IP05). *[AQR 12.5.2.6(d)]*
5. The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: IP04 and IP05). *[AQR 12.5.2.6(d)]*

Diesel Generators

6. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators (EUs: IP06 through IP11 and IP38) by retaining a copy of vendor fuel specifications. *[40 CFR 60.4207(b) and 40 CFR 63.6604(b)]*
7. The permittee shall operate each diesel-fired emergency generator engine (EUs: IP06 through IP11 and IP38) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. *[AQR 12.5.2.6(d)]*

1.7.4.2 Testing

1. Performance testing shall be the instrument for determining compliance with the emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: IP04 and IP05). *[AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]*
2. The permittee shall conduct performance tests on each boiler (EUs: IP04 and IP05) every five years, and no later than 90 days after the anniversary date of the last performance test. *[AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]*

Table 1-25: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Stack Gas Parameters	—	EPA Methods 1, 2, 3A, and 4

1.7.4.3 Recordkeeping

3. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer’s authorized representative upon request and without prior notice during the permittee’s hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Boilers/Water Heater

- c. Monthly natural gas fuel consumed by each boiler (EUs: IP04 and IP05) (reported semiannually);
d. Burner efficiency test results (EUs: IP04 and IP05);

Emergency Engines

- e. Date and duration of operation of each diesel-fired emergency generator for testing, maintenance, and nonemergency use (EUs: IP06 through IP11 and IP38) (reported semiannually);
f. Monthly duration of operation of each emergency generator for emergency use, including documentation justifying use during the emergency (EUs: IP06 through IP11 and IP38) (reported semiannually);
g. Sulfur content and cetane index or aromatic content of diesel fuel used to power each emergency generators, as certified by the supplier (EUs: IP06 through IP11 and IP38);

Nonroad Engines

- h. Records of location changes for nonroad engines, if applicable;

Emissions

- i. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
j. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and

- k. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
4. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
 5. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.8 PLANET HOLLYWOOD

1.8.1 Emission Units

The stationary source activities at the Planet Hollywood covered by this Part 70 OP consist of the emission units and associated appurtenances summarized in Table 1-26. [AQR 12.5.2.3, Part 70 OP (06/23/2021), and Application for Revision of Part 70 OP (05/09/2022)]

Table 1-26: Summary of EUs – Planet Hollywood

EU	Description	Rating	Manufacturer	Model No.	Serial No.
PH07	Natural Gas Boiler	23.65 MMBtu/hr	Unilux	ZF2000W	2339
PH08	Natural Gas Boiler	23.65 MMBtu/hr	Unilux	ZF2000W	2340
PH09	Natural Gas Boiler	23.65 MMBtu/hr	Unilux	ZF2000W	2341
PH10	Genset – Emergency	1,750 kW	Spectrum	1750DS4	0628031
	Engine – Diesel DOM: 1999	2,550 hp	MTU/Detroit Diesel	T1637K16	5272000427
PH11	Genset – Emergency	1,750 kW	Spectrum	1750DS4	0628032
	Engine – Diesel DOM: 1999	2,550 hp	MTU/Detroit Diesel	T1637K16	5272000397
PH12	Genset – Emergency	1,750 kW	Spectrum	1750DS4	0628033
	Engine – Diesel DOM: 1999	2,550 hp	MTU/Detroit Diesel	T1637K16	5272000421
PH13	Genset – Emergency	1,750 kW	MTU	1750RXC6DT2	301122-1-1- 1208
	Engine – Diesel DOM: 2008	2,560 hp	MTU/Detroit Diesel	T1238A36	5262003725
PH14	6-Cell Cooling Tower	33,360 gpm	Baltimore Aircoil Company	PCS50-2424-100- 12P3	PC2429

1.8.2 Controls

1.8.2.1 Control Devices

No add-on controls have been identified.

1.8.2.2 Control Requirements

Boilers/Water Heaters

1. The permittee shall combust only natural gas in all boilers/heaters. *[Part 70 OP (06/23/2021)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[Part 70 OP (06/23/2021)]*
3. The permittee shall operate and maintain the boilers (EUs: PH07 through PH09) with burners that have a manufacturer's maximum emission concentration of 30 ppm NO_x, corrected to 3% oxygen. *[Part 70 OP (06/23/2021)]*
4. The permittee shall operate and maintain the boilers (EUs: PH07 through PH09) with burners that have a manufacturer's maximum emission concentration of 100 ppm CO, corrected to 3% oxygen. *[Part 70 OP (06/23/2021)]*

Diesel Generators

5. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generator (EUs: PH10 through PH13). *[40 CFR 60.4207(b)]*
6. The permittee shall operate and maintain all diesel generators in accordance with the manufacturer's O&M manual for emissions-related components. *[Part 70 OP (06/23/2021)]*
7. The permittee shall ensure that the diesel engine is in compliance with 40 CFR Part 60, Subpart III, by meeting of all of the following (EU: PH13): *[40 CFR Part 60.4206]*
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Cooling Towers

8. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. No chromium-containing compounds shall be used for water treatment (EU: PH14). *[Part 70 OP (06/23/2021)]*
9. The permittee shall operate the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.005% (EU: PH14). *[Part 70 OP (06/23/2021)]*
10. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm (EU: PH14). *[Part 70 OP (06/23/2021)]*

Other

11. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

1.8.3 Limitations and Standards

1.8.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: PH10 through PH13) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: *[40 CFR Part 60.4211 and 40 CFR Part 63.6640]*
 - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

1.8.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-27. *[Part 70 OP (06/23/2021)]*

Table 1-27: PTE (tons per year) – Planet Hollywood

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
PH07	8,760 hr/yr	0.78	0.78	3.78	7.67	0.06	0.56	0.20
PH08	8,760 hr/yr	0.78	0.78	3.78	7.67	0.06	0.56	0.20
PH09	8,760 hr/yr	0.78	0.78	3.78	7.67	0.06	0.56	0.20
PH10	500 hr/yr	0.45	0.45	15.30	3.51	0.01	0.45	0.01
PH11	500 hr/yr	0.45	0.45	15.30	3.51	0.01	0.45	0.01
PH12	500 hr/yr	0.45	0.45	15.30	3.51	0.01	0.45	0.01
PH13	500 hr/yr	0.21	0.21	6.40	3.68	0.01	0.34	0.01
PH14	8,760 hr/yr	8.65	8.65	0.00	0.00	0.00	0.00	0.00

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

2. The permittee shall not allow actual emissions from the individual emission units to exceed the emission rates and emission concentrations listed in Table 1-28. *[AQR 12.5.2.3 and Part 70 OP (06/23/2021)]*

Table 1-28: Emissions – Planet Hollywood

EU	Rating	NO _x /CO (ppm) ¹	NO _x (lbs/hr)	CO (lbs/hr)
PH07	23.65 MMBtu/hr	NO _x 30/CO 100	0.86	1.75
PH08	23.65 MMBtu/hr	NO _x 30/CO 100	0.86	1.75
PH09	23.65 MMBtu/hr	NO _x 30/CO 100	0.86	1.75

¹Corrected to 3% oxygen.

3. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[AQR 26.1]*

1.8.4 Compliance Demonstration Requirements

1.8.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

1. The permittee shall install and utilize nonresettable fuel meters such that the daily consumption of natural gas can be established for each applicable boiler (EUs: PH07 through PH09). *[AQR 12.5.2.6(d) and 40 CFR Part 60.48c(g)(2)]*
2. The permittee shall perform a burner efficiency test twice each calendar year, at least five months apart but no more than seven (EUs: PH07 through PH09). *[AQR 12.5.2.6(d)]*
3. The permittee shall conduct burner efficiency tests in accordance with the manufacturer’s O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: PH07 through PH09). *[AQR 12.5.2.6(d)]*
4. The permittee may perform a burner efficiency test once each calendar year if the actual hours of operation are less than 50. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: PH07 through PH09). *[AQR 12.5.2.6(d)]*
5. The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: PH07 through PH09). *[AQR 12.5.2.6(d)]*

Diesel Generators

6. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators (EUs: PH10 through PH13) by retaining a copy of vendor fuel specifications. *[40 CFR 60.4207(b) and 40 CFR 63.6604(b)]*

7. The permittee shall operate each diesel-fired emergency generator engine (EUs: PH10 through PH13) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. [AQR 12.5.2.6(d)]

Cooling Towers

8. The permittee shall monitor the TDS in the cooling tower circulation water monthly. The permittee may use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS (EU: PH14). [AQR 12.5.2.6(d)]

1.8.4.2 Testing

1. Performance testing shall be the instrument for determining compliance with the emission limitations set forth in this permit for all boilers that have a heat input rating equal to or greater than 10.0 MMBtu/hr (EUs: PH07 through PH09). [AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]
2. The permittee shall conduct performance tests on each boiler (EUs: PH07 through PH09) every five years, and no later than 90 days after the anniversary date of the last performance test. [AQR 12.5.2.8(a) and the Clark County Guidelines for Source Testing (9/19/2019)]

Table 1-29: Performance Testing Protocol Requirements

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Stack Gas Parameters	—	EPA Methods 1, 2, 3A, and 4

1.8.4.3 Recordkeeping

3. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer’s authorized representative upon request and without prior notice during the permittee’s hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EU: PH14);

Boilers/Water Heater

- d. Monthly natural gas fuel consumed by each boiler (EUs: PH07 through PH09) (reported semiannually);

- e. Burner efficiency test results (EUs: PH07 through PH09);

Emergency Engines

- f. Date and duration of operation of each diesel-fired emergency generator for testing, maintenance, and nonemergency use (EUs: PH10 through PH12 and PH13) (reported semiannually);
- g. Monthly duration of operation of each emergency generator for emergency use, including documentation justifying use during the emergency (EUs: PH10 through PH12 and PH13) (reported semiannually);
- h. Sulfur content and cetane index or aromatic content of diesel fuel used to power the emergency generators, as certified by the supplier (EUs: PH10 through PH13);

Nonroad Engines

- i. Records of location changes for nonroad engines, if applicable;

Emissions

- j. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
 - k. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
 - l. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
4. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
5. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.9 LINQ COMPLEX – HIGH ROLLER

1.9.1 Emission Units

The stationary source activities at the LINQ Complex – High Roller covered by this Part 70 OP consist of the emission units and associated appurtenances summarized in Table 1-30. [AQR 12.5.2.3; Title V OP Significant Revision (05/29/13); Title V OP (03/28/2016); and NSR ATC (02/23/2023)]

Table 1-30: Summary of EUs – LINQ Complex – High Roller

EU	Description	Rating	Make	Model No.	Serial No.
LI01	Natural Gas Boiler	5.0 MMBtu/hr	CAMUS	DNRH-5000-MSI	041215509
LI02	Natural Gas Boiler	5.0 MMBtu/hr	CAMUS	DNRH-5000-MSI	041215507
LI03	Natural Gas Boiler	5.0 MMBtu/hr	CAMUS	DNRH-5000-MSI	041215508
LI04	Natural Gas Boiler	5.0 MMBtu/hr	CAMUS	DNRH-5000-MSI	041215506
LI05	Natural Gas Boiler	5.0 MMBtu/hr	CAMUS	DNRH-5000-MSI	041215505
LI06	Emergency Generator DOM: 2012	2,000 kW	Caterpillar	SR4B-GD	G4Z00115
		2,937 hp		3516C	SBJ01461
LI07	Emergency Generator DOM: 2012	2,000 kW	Caterpillar	SR4B-GD	G4Z00116
		2,937 hp		3516C	SBJ01460
LI08	Cooling Tower, 2 cell	6,000 gpm	Marley	NC8413VAN2BGF	NC-10054867- B1&B2
LI09	Cooling Tower, 2 cell	6,000 gpm	Marley	NC8413VAN2BGF	NC-10054867- C1&C2
LI10	Cooling Tower, 2 cell	6,000 gpm	Marley	NC8413VAN2BGF	NC-10054867- A1&A2
LI12	Emergency Engine DOM: 11/2012	180 kW	Deutz	TCD 6.1 L6	11360110
		241 hp			
LI13	Emergency Engine DOM: 11/2012	180 kW	Deutz	TCD 6.1 L6	11353814
		241 hp			

1.9.2 Controls

1.9.2.1 Control Devices

No add-on controls have been identified.

1.9.2.2 Control Requirements

Boilers/Water Heaters

1. The permittee shall combust only natural gas in all boilers/heaters. *[Title V OP (05/29/2013)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[Title V OP (05/29/2013)]*
3. The permittee shall operate and maintain the boilers (EUs: LI01 through LI05) with burners that have a manufacturer's maximum emission concentration of 9 ppm NO_x, corrected to 3% oxygen. *[Title V OP (05/29/2013)]*

4. The permittee shall operate and maintain the boilers (EUs: LI01 through LI05) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. [*Title V OP (05/29/2013)*]

Diesel Generators

5. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generator (EUs: LI06, LI07, LI12, and LI13). [*40 CFR 60.4207(b)*]
6. The permittee shall operate and maintain all diesel generators in accordance with the manufacturer's O&M manual for emissions-related components. [*Title V OP (05/29/2013)*]
7. The permittee shall ensure that the diesel engines are in compliance with 40 CFR Part 60, Subpart III, by meeting of all of the following (EUs: LI06, LI07, LI12, and LI13): [*40 CFR Part 60.4206*]
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Cooling Towers

8. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. No chromium-containing compounds shall be used for water treatment. [*Title V OP (05/29/2013)*]
9. The permittee shall operate each of the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.005% (EUs: LI08 through LI10). [*Title V OP (05/29/2013)*]
10. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm. [*Title V OP (12/19/2019)*]

Other

11. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. [*AQR 40 & AQR 43*]

1.9.3 Limitations and Standards

1.9.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generators (EUs: LI06, LI07, LI12, and LI13) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generators up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided

below (1.a–e inclusive), the emergency generators cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: [40 CFR Part 60.4211]

- a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.
- b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
- c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
- d. The power is provided only to the facility itself or to support the local transmission and distribution system.
- e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

1.9.3.2 Emission Limits

1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-31. [Title V OP Significant Revision (05/29/13), Title V OP (03/28/2016), and NSR ATC (02/23/2023)]

Table 1-31: PTE (tons per year) – The Cromwell Las Vegas

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
LI01	8,760 hr/yr	0.16	0.16	0.24	0.81	0.01	0.12	0.04
LI02	8,760 hr/yr	0.16	0.16	0.24	0.81	0.01	0.12	0.04
LI03	8,760 hr/yr	0.16	0.16	0.24	0.81	0.01	0.12	0.04
LI04	8,760 hr/yr	0.16	0.16	0.24	0.81	0.01	0.12	0.04
LI05	8,760 hr/yr	0.16	0.16	0.24	0.81	0.01	0.12	0.04
LI06	500 hr/yr	0.06	0.06	10.62	0.87	0.01	0.23	0.01
LI07	500 hr/yr	0.06	0.06	10.62	0.87	0.01	0.23	0.01
LI08	8,760 hr/yr	1.56	1.56	0.00	0.00	0.00	0.00	0.00
LI09	8,760 hr/yr	1.56	1.56	0.00	0.00	0.00	0.00	0.00
LI10	8,760 hr/yr	1.56	1.56	0.00	0.00	0.00	0.00	0.00
LI12	500 hr/yr	0.01	0.01	0.20	0.35	0.01	0.02	0.01
LI13	500 hr/yr	0.01	0.01	0.20	0.35	0.01	0.02	0.01

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

2. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. [AQR 26.1]

1.9.4 Compliance Demonstration Requirements

1.9.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

1. The permittee shall perform a burner efficiency test once each calendar year (EUs: LI01 through LI05). [AQR 12.5.2.6(d)]
2. The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: LI01 through LI05). [AQR 12.5.2.6(d)]
3. The permittee shall not have to perform a burner efficiency test if the actual hours of operation are 0. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: LI01 through LI05). [AQR 12.5.2.6(d)]
4. The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: LI01 through LI05). [AQR 12.5.2.6(d)]

Diesel Generators

5. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generators (EUs: LI06, LI07, LI12, and LI13) by retaining a copy of vendor fuel specifications. [40 CFR 60.4207(b)]
6. The permittee shall operate each diesel-fired emergency generator engine (EUs: LI06, LI07, LI12, and LI13) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. [AQR 12.5.2.6(d)]

Cooling Towers

7. The permittee shall monitor the TDS in the cooling tower circulation water monthly. The permittee may use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS (EUs: LI08 through LI10). [AQR 12.5.2.6(d)]

1.9.4.2 Testing

No performance testing requirements have been identified for units at The Cromwell Las Vegas at this time.

1.9.4.3 Recordkeeping

8. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: [AQR 12.5.2.6(d)(2)]

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EUs: LI08 through LI10);

Boilers/Water Heater

- d. Burner efficiency test results (EUs: LI01 through LI05);

Emergency Engines

- e. Date and duration of operation of each diesel-fired emergency generator (EUs: LI06, LI07, LI12, and LI13) for testing, maintenance, and nonemergency use (reported semiannually);
- f. Monthly duration of operation of each emergency generator (EUs: LI06, LI07, LI12, and LI13) for emergency use, including documentation justifying use during the emergency (reported semiannually);
- g. Sulfur content and cetane index or aromatic content of diesel fuel used to power each emergency generator and fire pump, as certified by the supplier (EUs: LI06, LI07, LI12, and LI13);

Nonroad Engines

- h. Records of location changes for nonroad engines, if applicable;

Emissions

- i. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
- j. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
- k. Calendar year annual emissions calculated for each emission unit in this section (reported annually).

9. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
10. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.10 BATTISTA'S

1.10.1 Emission Units

All the emission units at Battista's are insignificant and are listed in Section 11.3 of this Part 70 OP.

1.10.2 Controls

1.10.2.1 Control Devices

No add-on controls have been identified.

1.10.2.2 Control Requirements

No control requirements have been identified.

1.10.3 Limitations and Standards

1.10.3.1 Operational Limits

No operational limits have been identified.

1.10.3.2 Emission Limits

1. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than six consecutive minutes. *[AQR 26.1]*

1.10.4 Compliance Demonstration Requirements

1.10.4.1 Monitoring

No monitoring requirements have been identified.

1.10.4.2 Testing

No performance testing requirements have been identified.

1.10.4.3 Recordkeeping

No recordkeeping requirements have been identified.

1.11 FORUM MEETING CENTER

1.11.1 Emission Units

- a. The stationary source activities at the Forum Meeting Center covered by this Part 70 OP consist of the emission units and associated appurtenances summarized in Table 1-32. *[AQR 12.5.2.3 and Title V OP (12/19/2019)]*

Table 1-32: Summary of EUs – Forum Meeting Center

EU	Description	Rating	Make	Model No.	Serial No.
FMC01	Boiler	6.00 MMBtu/hr	Lochinvar	FBN6001	1847112615299
FMC02	Boiler	6.00 MMBtu/hr	Lochinvar	FBN6001	1847112615300
FMC03	Boiler	6.00 MMBtu/hr	Lochinvar	FBN6001	1847112615301
FMC04	Boiler	6.00 MMBtu/hr	Lochinvar	FBN6001	1847112615298
FMC05	Emergency Generator DOM: 1/21/2019	1,000 kW	Cummins	DQFAD-A061Y200	B190508151
		1,490 hp		QST30	37277632
FMC06	Cooling Tower, 2-Cell	2,400 gpm/cell	Evapco	USS224-4P20	18-849683
FMC07	Cooling Tower, 2-Cell	2,400 gpm/cell	Evapco	USS224-4P20	18-849684

1.11.2 Controls

1.11.2.1 Control Devices

No add-on controls have been identified.

1.11.2.2 Control Requirements

Boilers/Water Heaters

1. The permittee shall combust only natural gas in all boilers/heaters. *[Title V OP (12/19/2019)]*
2. The permittee shall operate and maintain all boilers/heaters in accordance with the manufacturer's O&M manual for emissions-related components and good combustion practices. *[Title V OP (12/19/2019)]*
3. The permittee shall operate and maintain the boilers (FMC01 through FMC04) with burners that have a manufacturer's maximum emission concentration of 20 ppm NO_x, corrected to 3% oxygen. *[Application for Revision of Part 70 OP (05/09/2022)]*
4. The permittee shall operate and maintain the boilers (EUs: FMC01 through FMC04) with burners that have a manufacturer's maximum emission concentration of 50 ppm CO, corrected to 3% oxygen. *[Title V OP (12/19/2019)]*

Diesel Generator

5. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the emergency generator (EU: FMC05). [40 CFR 60.4207(b)]
6. The permittee shall operate and maintain the diesel generator in accordance with the manufacturer's O&M manual for emissions-related components. [Title V OP (12/19/2019)]
7. The permittee shall ensure that the diesel engine is in compliance with 40 CFR Part 60, Subpart III, by meeting all of the following (EU: FMC05): [40 CFR Part 60.4206]
 - a. Operation of the engine according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer; and
 - b. Installation and configuration of the engine according to the manufacturer's specifications.

Cooling Towers

8. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components. No chromium-containing compounds shall be used for water treatment. [Title V OP (12/19/2019)]
9. The permittee shall operate each of the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.001% (EUs: FMC06 and FMC07). [Title V OP (12/19/2019)]
10. The permittee shall limit the TDS content of each cooling tower's circulation water to 5,000 ppm. [Title V OP (12/19/2019)]

Other

11. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. [AQR 40 & AQR 43]

1.11.3 Limitations and Standards

1.11.3.1 Operational Limits

1. The permittee shall limit the operation of the emergency generator (EU: FMC05) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generator up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (1.a–e inclusive), the emergency generator cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: [40 CFR Part 60.4211]
 - a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.

- b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.
- c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
- d. The power is provided only to the facility itself or to support the local transmission and distribution system.
- e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

1.11.3.2 Emission Limits

- 1. The permittee shall limit the actual emissions from each emission unit to the PTE listed in Table 1-33. *[Title V OP (12/19/2019) and Application for Revision of Part 70 OP (05/09/2022)]*

Table 1-33: PTE (tons per year) – Forum Meeting Center

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs
FMC01	8,760 hr/yr	0.20	0.20	0.64	0.97	0.02	0.14	0.05
FMC02	8,760 hr/yr	0.20	0.20	0.64	0.97	0.02	0.14	0.05
FMC03	8,760 hr/yr	0.20	0.20	0.64	0.97	0.02	0.14	0.05
FMC04	8,760 hr/yr	0.20	0.20	0.64	0.97	0.02	0.14	0.05
FMC05	500 hr/yr	0.08	0.08	3.61	0.41	0.01	0.26	0.01
FMC06	8,760 hr/yr	0.25	0.25	0.00	0.00	0.00	0.00	0.00
FMC07	8,760 hr/yr	0.25	0.25	0.00	0.00	0.00	0.00	0.00

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

- 2. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than 6 consecutive minutes. *[AQR 26.1]*

1.11.4 Compliance Demonstration Requirements

1.11.4.1 Monitoring

Visible Emissions

See Section 2.0.

Boilers/Water Heaters

- 1. The permittee shall perform a burner efficiency once each calendar year (EUs: FMC01 through FMC04). *[AQR 12.5.2.6(d)]*

2. The permittee shall conduct burner efficiency tests in accordance with the manufacturer's O&M manual and good combustion practices. Alternative methods may be used upon Control Officer approval (EUs: FMC01 through FMC04). *[AQR 12.5.2.6(d)]*
3. The permittee shall not have to perform a burner efficiency test if the actual hours of operation are 0. To exercise this option, the permittee must install an hour meter and begin keeping written records before the start of the calendar year (EUs: FMC01 through FMC04). *[AQR 12.5.2.6(d)]*
4. The permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: FMC01 through FMC04). *[AQR 12.5.2.6(d)]*

Diesel Generator

5. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the emergency generator (EU: FMC05) by retaining a copy of vendor fuel specifications. *[40 CFR 60.4207(b)]*
6. The permittee shall operate each diesel-fired emergency generator engine (EU: FMC05) with a nonresettable hour meter and monitor each one during testing, maintenance, and nonemergency operation. If the engine is used for an emergency, the permittee shall monitor its operation and document the nature of the emergency. *[AQR 12.5.2.6(d)]*

Cooling Towers

7. The permittee shall monitor the TDS in the cooling tower circulation water monthly. The permittee may use a conductivity meter or an equivalent method approved in advance by the Control Officer to determine TDS (EUs: FMC06 and FMC07). *[AQR 12.5.2.6(d)]*

1.11.4.2 Testing

No performance testing requirements have been identified for units at The Forum Meeting Center at this time.

1.11.4.3 Recordkeeping

8. The permittee shall create and maintain the following records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation: *[AQR 12.5.2.6(d)(2)]*

Opacity

- a. Dates and time when visible emissions checks and observations are made, and the steps taken to make any necessary corrections to bring opacity into compliance;

Inspections/Maintenance/General

- b. Log book of all inspections, maintenance, and repairs, as specified in this document;

Cooling Towers

- c. Monthly TDS content measurements of cooling tower circulation water (EUs: FMC06 and FMC07);

Boilers/Water Heater

- d. Burner efficiency test results (EUs: FMC01 through FMC04);

Emergency Engines

- e. Date and duration of operation of each diesel-fired emergency generator for testing, maintenance, and nonemergency use (EU: FMC05) (reported semiannually);
- f. Monthly duration of operation of each emergency generator for emergency use, including documentation justifying use during the emergency (EU: FMC05) (reported semiannually);
- g. Sulfur content and cetane index or aromatic content of diesel fuel used to power the emergency generator and fire pump, as certified by the supplier (EU: FMC05);

Nonroad Engines

- h. Records of location changes for nonroad engines, if applicable;

Emissions

- i. Deviations from permit requirements that result in excess emissions (reported as required in Section 5.0 of this permit);
 - j. Deviations from permit requirements that do not result in excess emissions (reported semiannually); and
 - k. Calendar year annual emissions calculated for each emission unit in this section (reported annually).
9. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable.
10. The permittee shall comply with the general recordkeeping requirements identified in Section 4.0.

1.12 INSIGNIFICANT ACTIVITIES

Units or activities, identified in Section 11.3 of this permit, are present at this source but are insignificant pursuant to AQR 12.5.2.5. The emissions from these units or activities, when added to the PTE of the source, will not make the source major for any additional pollutant.

1.13 NONROAD ENGINES

Pursuant to Title 40, Part 1068.30 of the Code of Federal Regulations (40 CFR Part 1068.30), nonroad engines shall not remain at a location for more than 12 consecutive months; otherwise, the engine(s) will constitute a stationary reciprocating internal combustion engine (RICE) and be subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 60, Subpart IIII; and/or 40 CFR Part 60, Subpart JJJJ. Stationary RICE shall be permitted as emission units upon commencing operation at this stationary source.

Records of location changes for portable or transportable nonroad engines shall be maintained, and shall be made available to the Control Officer upon request. These records are not required for engines owned and operated by a contractor for maintenance and construction activities as long as records are maintained demonstrating that such work took place at the stationary source for periods of less than 12 consecutive months.

Nonroad engines used on self-propelled equipment do not have this 12-month limitation or the associated recordkeeping requirements.

2.0 *VISIBLE EMISSIONS REQUIREMENTS*

Visible Emissions [AOR 12.5.2.6(d) & AOR 12.5.2.8]

1. The Responsible Official shall sign and adhere to the *Visible Emissions Check Guidebook* and keep a copy of the signed guide on-site at all times.
2. The permittee shall conduct a visual emissions check at least quarterly on each diesel-fired emergency generator and each fire pump while in operation.
3. If no plume appears to exceed the opacity standard during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.
4. If a plume appears to exceed the opacity standard, the permittee shall do one of the following:
 - a. Immediately correct the perceived exceedance, then record the first and last name of the person who performed the emissions check, the date the check was performed, the unit(s) observed, and the results of the observation; or
 - b. Call a certified Visible Emissions Evaluation (VEE) reader to perform an EPA Method 9 evaluation.
 - i. For sources required to have a certified reader on-site, the reader shall start Method 9 observations within 15 minutes of the initial observation. For all other sources, the reader shall start Method 9 observations within 30 minutes of the initial observation.
 - ii. If no opacity exceedance is observed, the certified VEE reader shall record the first and last name of the person who performed the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each emission unit that was initially perceived to have exceeded the opacity limit, and the record shall also indicate:
 - (1) The cause of the perceived exceedance;
 - (2) The color of the emissions; and
 - (3) Whether the emissions were light or heavy.
 - iii. If an opacity exceedance is observed, the certified VEE reader shall take immediate action to correct the exceedance. The reader shall then record the first and last name of the person performing the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each reading identified, and the record shall also indicate:
 - (1) The cause of the exceedance;
 - (2) The color of the emissions;
 - (3) Whether the emissions were light or heavy;

- (4) The duration of the emissions; and
 - (5) The corrective actions taken to resolve the exceedance.
5. Any scenario of visible emissions noncompliance can and may lead to enforcement action.

3.0 GENERAL TESTING

1. At the Control Officer's request, the permittee shall test (or have tests performed) to determine emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of those allowed by the AQRs is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. [AQR 4.2]
2. At the Control Officer's request, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.2]
3. The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, before the anticipated date of the performance test unless otherwise specified in this permit. [AQR 12.5.2.8]
4. The permittee shall submit to EPA for approval any alternative test methods EPA has not already approved to demonstrate compliance with a requirement under 40 CFR Part 60. [40 CFR Part 60.8(b)]
5. The permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days of the end of the test. [AQR 12.5.2.8]
6. Performance testing is subject to 40 CFR Part 60.8 (as amended), Subpart A, and the Clark County *Guidelines for Source Testing (9/19/2019)*. Performance testing shall be the instrument for determining initial and subsequent compliance with the emission limitations set forth in sections specified in this permit. [AQR 12.5.2.8(a)]
7. The Control Officer will consider approving the permittee's request for alternative performance test methods if proposed in writing in the performance test protocols. [AQR 12.5.2.8(a)]
8. The permittee of any stationary source that fails to demonstrate compliance with emissions standards or limitations during any performance test shall submit a compliance plan to the Control Officer within 90 days of the end of the performance test. [AQRs 10.1 & 12.5.2.8(a)]
9. The Control Officer may require additional performance testing when operating conditions appear inadequate to demonstrate compliance with the emissions and/or limitations in this permit. [AQRs 4.2 & 12.5.2.8(a)]

4.0 GENERAL RECORDKEEPING

1. The permittee shall keep records of all inspections, maintenance, and repairs, as required by this permit. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
2. All records, logs, etc., or copies thereof, shall be kept on-site for a minimum of five years from the date the measurement or data was entered. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
3. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. *[AQR 4.1]*

5.0 REPORTING AND NOTIFICATIONS

1. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. [AQR 12.5.2.8(e)]
2. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the EPA Region 9 Administrator (Director, Air and Radiation Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 of the following year, and shall include the following: [AQR 12.5.2.8(e)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 70.6(a)(3). If necessary, the permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and
 - c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in item 2.b. The certification shall identify each deviation and take it into account. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance was required and an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
3. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or this permit. The report shall be in two parts, as specified below: [AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]
 - a. Within 24 hours of the time the permittee learns of the excess emissions, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at airquality@clarkcountynv.gov.
 - b. Within 72 hours of the notification required by item 3.a, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.
4. With the semiannual monitoring report, the permittee shall report to the Control Officer all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. [AQR 12.5.2.6(d)(4)(B)]

5. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. *[AQR 25.6.2]*
6. The permittee shall submit all compliance certifications to EPA and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*
7. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or AQRs shall contain a certification by a Responsible Official, with an original signature, of truth, accuracy, and completeness. This certification, and any other required under AQR 12.5, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*
8. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Control Officer copies of records that the permit requires keeping. The permittee may furnish records deemed confidential directly to the Administrator, along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*
9. At the Control Officer's request, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of the control equipment in use. The Control Officer may require that such disclosures be certified by a professional engineer registered in the state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*
10. The permittee shall submit annual emissions inventory reports based on the following: *[AQRs 18.6.1 & 12.5.2.4]*
 - a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a Saturday or Sunday, or a Nevada or federal holiday, the submittal shall be due on the next regularly scheduled business day);
 - b. The calculated actual annual emissions from each emission unit shall be reported even if there was no activity, along with the total calculated actual annual emissions for the source based on the emissions calculation methodology used to establish the PTE in the permit or an equivalent method approved by the Control Officer prior to submittal; and
 - c. As the first page of text, a signed certification containing the sentence: "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate, and complete." This statement shall be signed and dated by a Responsible Official of the company (a sample form is available from DAQ).

11. Stationary sources that emit 25 tons or more of NO_x and/or 25 tons or more of VOCs from their emission units, insignificant activities, and exempt activities during a calendar year shall submit an annual emissions statement for both pollutants. Emissions statements must include actual annual NO_x and VOC emissions from all activities, including emission units, insignificant activities, and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (i.e., the emissions inventory). *[AQR 12.9.1]*
12. The permittee shall comply with all applicable notification and reporting requirements of 40 CFR Part 60.7, 40 CFR Part 60 Subpart OOO, 40 CFR Part 63 Subpart IIII, 40 CFR Part 63 Subpart ZZZZ, and 40 CFR Part 63, Subpart CCCCC. *[AQR 12.5.2.6(d)]*
13. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
14. The following requirements apply to semiannual reports: *[AQRs 12.5.2.6(d) & 12.5.2.8]*
 - a. The report shall include the item(s) listed in Sections 1.1.4.3, 1.2.4.3, 1.3.4.3, 1.4.4.3, 1.5.4.3, 1.6.4.3, 1.7.4.3, 1.8.4.3, 1.9.4.3, and 1.11.4.3 for semiannual reporting.
 - b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.
 - c. DAQ shall receive the report within 30 calendar days of the end of the semiannual period.
15. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table 5-1. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

Table 5-1: Required Submission Dates for Various Reports

Required Report	Applicable Period	Due Date
Semiannual report for 1 st six-month period	January, February, March, April, May, June	July 30 each year ¹
Semiannual report for 2 nd six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year ¹
Annual Compliance Certification	Calendar year	January 30 each year ¹
Annual Emissions Inventory Report	Calendar year	March 31 each year ¹
Annual Emissions Statement ²	Calendar year	March 31 each year ¹
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 24 hours of the permittee learns of the event
Excess Emissions that Pose a Potential Imminent and Substantial Danger	As required	No less than 45 days, but no more than 90 days, before the anticipated test date ¹
Performance Testing Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date ¹

Required Report	Applicable Period	Due Date
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As required	Along with semiannual reports ¹
Performance Testing	As required	Within 60 days of end of test ¹

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

² Required only for stationary sources that emit 25 tons or more of NO_x and/or 25 tons or more of VOCs during a calendar year.

16. The Control Officer reserves the right to require additional reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. *[AQR 4.1]*

6.0 MITIGATION

The source has no federal offset requirements. *[AQR 12.7]*

7.0 PERMIT SHIELD

The source has not requested a permit shield. *[AQR 12.5.2.9]*

8.0 ACID RAIN PROGRAM REQUIREMENTS

The source is not subject to Acid Rain Program requirements.

9.0 OTHER REQUIREMENTS

1. Any person who violates any provision of the AQRs, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any requirements from DAQ is guilty of a civil offense and shall pay a civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1; NRS 445B.640]*
2. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review, as provided in Chapter 233B of the NRS. *[AQR 9.12]*
3. The permittee shall comply with the requirements of Title 40, Part 61 of the Code of Federal Regulations (40 CFR Part 61), Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
4. The permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a Class I or Class II ozone-depleting substance or any nonexempt substitute refrigerant as a working fluid, unless such fluid has been approved for sale in such use by the EPA Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. *[40 CFR Part 82]*
5. A risk management plan is required for the storing, handling and use of an applicable “Highly Hazardous Chemical” pursuant to 40 CFR Part 68. The permittee shall submit revisions of the risk management plan to the appropriate authority and a copy to DAQ. *[40 CFR Part 68.150(b)(3)]*

10.0 ADMINISTRATIVE REQUIREMENTS

10.1 GENERAL

1. The permittee shall comply with all conditions of the Part 70 OP. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations, Nevada law, and the Clean Air Act, and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a renewal application. *[AQR 12.5.2.6(g)(1)]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall be unaffected and remain valid. *[AQR 12.5.2.6(f)]*
3. The permittee shall pay all permit fees pursuant to AQR 18. *[AQR 12.5.2.6(h)]*
4. This permit does not convey property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The permittee agrees to allow inspection of the premises to which this permit relates by any authorized representative of the Control Officer at any time during the permittee's hours of operation without prior notice. The permittee shall not obstruct, hamper, or interfere with any such inspection. *[AQRs 4.1, 5.1.1, & 12.5.2.8(b)]*
6. The permittee shall allow the Control Officer, upon presentation of credentials, to:
[AQRs 4.1 & 12.5.2.8(b)]
 - a. Access and copy any records that must be kept under the conditions of the permit;
 - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
 - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
 - d. Document alleged violations using such devices as cameras or video equipment.
7. Any permittee who fails to submit relevant facts, or who has submitted incorrect information in a permit application, shall, upon becoming aware of such failure or incorrect submittal, promptly submit the needed supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. A Responsible Official shall certify the additional information consistent with the requirements of AQR 12.5.2.4. *[AQR 12.5.2.2]*
8. Anyone issued a permit under AQR 12.5 shall post it in a location where it is clearly visible and accessible to facility employees and DAQ representatives. *[AQR 12.5.2.6(m)]*
9. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*

10.2 MODIFICATION, REVISION, AND RENEWAL REQUIREMENTS

1. No person shall begin actual construction of a new Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an Authority to Construct (ATC) from the Control Officer. *[AQR 12.4.1.1(a)]*
2. This permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. The filing of a request by the permittee for a permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*
3. The permit shall be reopened under any of the following circumstances and when all applicable requirements pursuant to AQR 12.5.2.15 are met: *[AQR 12.5.2.15(a)]*
 - a. New requirements become applicable to a stationary source considered “major” (per the definition in AQR 12.2, AQR 12.3, or 40 CFR Part 70.3(a)(1)) with a remaining permit term of three or more years;
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the Acid Rain Program;
 - c. The Control Officer or EPA determines that the permit contains a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - d. The EPA Administrator or the Control Officer determines that the permit must be revised or revoked to assure compliance with applicable requirements.
4. A permit, permit revision, or renewal may be approved only if all of the following conditions have been met: *[AQR 12.5.2.10(a)]*
 - a. The permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal (except that, pursuant to AQR 12.5.2.20, a complete application need not be received before a Part 70 general permit is issued); and
 - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of AQR 12.5.
5. The permittee shall not build, erect, install, or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 & 40 CFR Part 60.12]*
6. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*
7. Permit expiration terminates the permittee’s right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*

8. For purposes of permit renewal, a timely application is a complete application that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

11.0 ATTACHMENTS

11.1 APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable

1. NRS Chapter 445B.
2. Applicable AQRs listed in Table 11-1.

Table 11-1: Applicable Clark County AQRs

Citation	Title
AQR 00	"Definitions"
AQR 02	"Air Pollution Control Board"
AQR 04	"Control Officer"
AQR 05	"Interference with Control Officer"
AQR 06	"Injunctive Relief"
AQR 07	Hearing Board and Hearing Officer"
AQR 08	"Persons Liable for Penalties – Punishment: Defense"
AQR 09	"Civil Penalties"
AQR 10	"Compliance Schedules"
AQR 11	"Ambient Air Quality Standards"
AQR 12.0	"Applicability and General Requirements"
AQR 12.2	"Permit Requirements for Major Sources in Attainment Areas"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.6	"Confidentiality"
AQR 12.7	"Emission Reduction Credits"
AQR 12.9	"Annual Emissions Inventory Requirement"
AQR 12.10	"Continuous Monitoring Requirements for Stationary Sources"
AQR 12.12	"Transfer of Permit"
AQR 12.13	"Posting of Permit"
AQR 13.2(b)(1)	"Subpart A - General Provisions"
AQR 13.2(b)(82)	"Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
AQR 13.2(b)(106)	"Subpart CCCCCC - National Emissions Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities"
AQR 14.1(b)(1)	"Subpart A – General Provisions"
AQR 14.1(b)(81)	"Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
AQR 18	"Permit and Technical Service Fees"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"
AQR 26	"Emission of Visible Air Contaminants"

Citation	Title
AQR 28	"Fuel Burning Equipment"
AQR 29	"Sulfur Contents of Fuel Oil"
AQR 35	"Diesel Engine Powered Electrical Generating Equipment"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust", AQR 41.1.2 only
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"
AQR 50	"Storage of Petroleum Products"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"
AQR 81	"Provisions of Regulations Severable"
AQR 92	"Fugitive Dust from Unpaved Parking Lots and Storage Areas"
AQR 94	"Permitting and Dust Control for Construction Activities"

3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)

4. Applicable 40 CFR sections listed in Table 11-2.

Table 11-2: Federal Standards

Citation	Title
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"
40 CFR Part 60, Subpart A	"General Provisions"
40 CFR Part 60, Subpart IIII	"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 60, Appendix A-3	"Test Methods 4 through 5I" (PM in g/dscm)
40 CFR Part 60, Appendix A-4	"Test Methods 6 through 10B" (opacity)
40 CFR Part 63, Subpart A	"General Provisions"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 63, Subpart CCCCC	"National Emissions Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities"
40 CFR Part 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"

11.2 INSIGNIFICANT ACTIVITIES

Table 11-3: Insignificant Units and Activities

Description	Rating/Capacity	Manufacturer	Model No.	Serial No.
Harrah's Las Vegas				
Natural Gas Pool Heater	0.726 MMBtu/hr	Raypak	P-724	1404376451
Spray Paint Booth	NA	Global Finishing Solutions	FP10812.100	NA
Dust Collector	4,550 cfm	Murphy-Rodgers	MRM-12-4D(42B)	1839
Flamingo Las Vegas				
Dust Collector	2,600 cfm	Murphy-Rodgers	MRM-10-2D	1181
Abrasive Blast Cabinet	NA	Badboy Blasters, Inc.	BB-3000-XLD	NA
Diesel UST	8,000 gal	NA	NA	NA
Diesel UST	1,000 gal	NA	NA	NA
Horseshoe Las Vegas				
Spray Paint Booth	NA	Spray King	200FAFC	659-1
Abrasive Blast Cabinet w/Dust Collector	NA	Econoline Syphon; Dayton	36-1; 2Z982H	NA
Dust Collector	NA	Cincinnati Fan and Ventilator Company	100S	G006678
Dust Collector	NA	Cincinnati Fan and Ventilator Company	100S	G006766
Dust Collector	NA	Cincinnati Fan and Ventilator Company	100S	G006769
Dust Collector	NA	Cincinnati Fan and Ventilator Company	100S	G006768
Dust Collector	NA	Cincinnati Fan and Ventilator Company	100S	G006677
Diesel AST	12,150 gal	NA	NA	NA
Diesel UST	2,000 gal	NA	NA	NA
Diesel AST	300 gal	NA	NA	NA
Diesel AST	300 gal	NA	NA	NA
Diesel AST	300 gal	NA	NA	NA
Caesars Palace				
Spray Paint Booth	NA	Spray King	200-P	NA
Dust Collector	NA	Pollution International	33N375	NA
Natural Gas Pool Heater	0.400 MMBtu/hr	Pentair	460775	1118310130019Y
Natural Gas Pool Heater	0.400 MMBtu/hr	Pentair	460775	1118230120110G
Diesel AST	575 gal	NA	NA	NA
Diesel AST	575 gal	NA	NA	NA
Natural Gas Boiler (Kitchen)	0.199 MMBtu/hr	Lochinvar	SNR200-100	J10C20021904
Natural Gas Boiler (Kitchen)	0.199 MMBtu/hr	Lochinvar	SNR200-100	D12C20037269

Natural Gas Water Heater	0.25 MMBtu/hr	A.O. Smith	BTH250A200	1615M000633
Natural Gas Water Heater	0.25 MMBtu/hr	A.O. Smith	BTH250A100	0826M001486
Natural Gas Water Heater	0.999 MMBtu/hr	Lochinvar	PBN1002	A15H00273568
Paris Las Vegas				
Spray Paint Booth	NA	Spray Systems	I-887	NA
Dust Collector	NA	Donaldson Torit	UMA358K11AD	97-1572
Natural Gas Boiler	0.39 MMBtu/hr	A.O. Smith	BTR400A-118	1307M001458
Natural Gas Boiler	0.39 MMBtu/hr	A.O. Smith	BTR400A-118	1027M001734
Sandblasting Cabinet	NA	NA	NA	NA
Diesel UST	8,000 gal	NA	NA	NA
The LINQ Hotel & Casino				
Dust Collector	NA	Air Sentry, Inc.	205D550F	1216
Planet Hollywood				
Natural Gas Boiler	0.650 MMBtu/hr	Lochinvar	CB0645	L008207
Natural Gas Boiler	0.650 MMBtu/hr	Lochinvar	CB0645	L008208
Natural Gas Boiler	0.300 MMBtu/hr	Lochinvar	CPN0300	D004949
Natural Gas Boiler	0.300 MMBtu/hr	Lochinvar	CPN0300	D004950
Spray Paint Booth	NA	NA	NA	NA
Dust Collector	1,500 cfm	Torit	RVS15	I6600032-001
Cooking Oil AST	488 gal	NA	NA	NA
LINQ Complex – High Roller				
Natural Gas Water Heater	0.150 MMBtu/hr	A.O. Smith	BTH-150-300	2102122746244
Battista's				
Natural Gas Boiler (Kitchen)	0.150 MMBtu/hr	Trane	YCH150C3L0BB	NA
Natural Gas Boiler (Kitchen)	0.150 MMBtu/hr	Trane	YCH150C3L0BB	NA
Natural Gas Boiler (Kitchen)	0.150 MMBtu/hr	Trane	YCH150C3L0BB	NA
Natural Gas Boiler (Kitchen)	0.150 MMBtu/hr	Trane	YCH150C3L0BB	NA
Natural Gas Boiler (Kitchen)	0.150 MMBtu/hr	Trane	YCH150C3L0BB	NA
Natural Gas Boiler (Kitchen)	0.075 MMBtu/hr	A.O Smith	BT-100	NA
Natural Gas Boiler (Kitchen)	0.075 MMBtu/hr	A.O Smith	BT-100	NA
Natural Gas Boiler (Kitchen)	0.075 MMBtu/hr	A.O Smith	BT-100	NA

Jennifer Cortez

From: Jeri Ruskowitz <jruskowitz1@caesars.com>
Sent: Monday, April 24, 2023 3:18 PM
To: Jennifer Cortez
Cc: Eric Dominguez
Subject: RE: DAQ Part 70 Operating Final Action Report_ Permit_and_Technical Support Document for Source ID: 00257_Caesars Entertainment Inc Caesars Consolidated Properties

Received, thank you.



Jeri Ruskowitz | *Director Environmental Compliance*
| M 702-755-3579
One Caesars Palace Dr. | Las Vegas, Nevada 89109

www.caesars.com

From: Jennifer Cortez <Jennifer.Cortez@ClarkCountyNV.gov>
Sent: Monday, April 24, 2023 3:12 PM
To: Eric Dominguez <EDOMINGUEZ@CAESARS.COM>; Jeri Ruskowitz <JRUSKOWITZ1@CAESARS.COM>
Subject: [EXTERNAL] DAQ Part 70 Operating Final Action Report_ Permit_and_Technical Support Document for Source ID: 00257_Caesars Entertainment Inc Caesars Consolidated Properties
Importance: High

****CAUTION** - EXTERNAL EMAIL**

DO NOT open attachments or click on links from unknown senders or unexpected emails
The Original Sender of this email is jennifer.cortez@clarkcountynv.gov.

Attached are the Final Action Report, Permit and Technical Support Documents for Source ID: 00257, Caesars Entertainment Inc Caesars Consolidated Properties. The documents should be printed and maintained on site.

If you have any questions, please contact Mike Rael at 702-455-5942.

Please confirm receipt of this email.

Thank you,

Jennifer Cortez
Division of Air Quality – Permitting
Clark County Department of Environment and Sustainability

4701 W. Russell Rd. Ste. 200

Las Vegas, NV 89118

Phone: 702-455-1669

Office Hours: Mon – Thurs 7:30 am – 5:30 pm