

**Response to Comments For
Title V Permit to Operate Renewal
Permit No. V-ML-2711500031-2016-01**

The U.S. Environmental Protection Agency issued on August 25, 2016 a draft Title V operating permit renewal for Mille Lacs Corporate Ventures dba Grand Casino Hinckley (the Permittee), Grand Casino Hinckley located at 777 Lady Luck Drive, Hinckley, Minnesota (the Source), on which EPA sought public comment pursuant to 40 C.F.R. Part 71. The comment period ended on September 24, 2016. EPA received one timely written comment from the Permittee. This document summarizes the comment and provides EPA's response to the comment.

1. Section II(D)(1)(a) of the draft permit (page 9 of 47) requires NO_x performance testing on each engine (EU001, EU002 and EU003) within 180 days of permit issuance to ascertain compliance with the NO_x emission rates and limits in Section II(A)(1)(a). Such testing was performed July 5-7, 2016 and a test report documenting that compliance was demonstrated was submitted electronically to EPA Region 5 on August 19, 2016. We therefore request that EPA consider the July 2016 testing as satisfying the requirement of Section II(D)(1) and that item (1) be removed from the permit. Requiring the performance testing to be repeated within the next six months would therefore impose an unreasonable burden on Grand Casino Hinckley.

EPA Response: EPA agrees that it is appropriate to remove Section II(D)(1) of the permit in light of the recent performance test demonstrating compliance with applicable NO_x emission rates and limits. As described in Section 6(d) of the Statement of Basis, the performance test requirement of Section II(D)(1)(a) was added because the facility was not able to consistently demonstrate compliance with the NO_x emission limit of 6.55 g/bhp-hr for EU001, EU002 and EU003 when using a portable electrochemical analyzer. Since the performance tests performed on July 5-7, 2016 document that compliance was demonstrated, requiring an additional test within the next six months is unnecessary. The requirements of Section II(D)(1) have been removed from the final permit, and the permit conditions have been renumbered accordingly.