

STATEMENT OF BASIS for 1000 BOARDWALK LLC

TITLE V OPERATING PERMIT SIGNIFICANT MODIFICATION

Program Interest (PI): 70502 / Permit Activity Number: BOP240001

I. FACILITY INFORMATION

1000 Boardwalk LLC is located at 1000 Boardwalk, Atlantic City, Atlantic County, New Jersey 08401 and consists of a hotel, convention, and casino gaming facility. The facility is owned and operated by 1000 Boardwalk LLC.

The facility is classified as a major facility based on its potential to emit 34.3 tons per year of nitrogen oxides to the atmosphere in the current permit. In this modification, the facility's potential to emit nitrogen oxides is reduced to 22.1 tons per year, which is below the major threshold levels in the definition of "Major Facility" at N.J.A.C. 7:27-22.1.

This permit allows individual hazardous air pollutants to be emitted at a rate not to exceed: 0.14 pounds per year of arsenic, 0.58 pounds per year of cadmium, 39.4 pounds per year of formaldehyde, 0.042 pounds per year of cobalt, and 0.0078 pounds per year of Dimethylbenz(a)anthracene (7,12-).

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: eight steam boilers for space heating and ten emergency generators.

Health Risk Assessment was conducted as part of the review of this permit application and health risk was determined to be negligible consistent with NJDEP Technical Manual 1003.

This is a Permit Modification and includes the following changes:

- The natural gas usage limit for U2 Boilers (U2 OS Summary Ref#17) was reduced from 833.48 MMft³ per any consecutive 12 month period to 490 MMft³ per any consecutive 12 month period.

- Hazardous Air Pollutant (HAP) emissions above the reporting thresholds in N.J.A.C. 7:27-17.9 were added for U2.

- Criteria Air Pollutant limits for U2 were reduced as follows:

- VOC: 1.84 tons per year (tpy) to 1.14 tpy

- NO_x: 30.4 tpy to 18.2 tpy

- CO: 8.04 tpy to 4.88 tpy

- TSP, PM-10 & PM-2.5: 3.3 tpy to 1.99 tpy

- Facility-wide criteria air pollutant emissions were reduced as follows:

- VOC: 2.1 tpy to 1.4 tpy

- NO_x: 34.3 tpy to 22.1 tpy

- CO: 8.68 tpy to 5.52 tpy

- TSP, PM-10 & PM-2.5: 3.50 to 2.19 tpy

- Facility-wide emissions for each air pollutant are now below major source thresholds.

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This modification will also change the facility-wide emission limits as listed in the following table:

Allowable Emission Limits	Facility's Potential Emissions (tons per year)*									
	VOC (total)	NO _x	CO	SO ₂	TSP (total)	PM ₁₀ (total)	PM _{2.5} (total)	Pb	HAPs (total)	CO _{2e} (total)
Current Permit	2.10	34.3	8.68	N/A	3.50	3.50	3.50	N/A	N/A	50,900
Proposed Permit	1.40	22.1	5.52	N/A	2.19	2.19	2.19	N/A	0.02	30,390
Change (+ / -)	-0.70	-12.2	-3.16	N/A	-1.31	-1.31	-1.31	N/A	+0.02	-20,510

VOC Volatile Organic Compounds

NO_x Nitrogen Oxides

CO Carbon Monoxide

SO₂ Sulfur Dioxide

TSP Total Suspended Particulates

PM₁₀

Particulates under 10 microns

PM_{2.5}

Particulates under 2.5 microns

Pb

Lead

HAPs

Hazardous Air Pollutants

CO_{2e}

Carbon Dioxide equivalent

* Other Any other air contaminant regulated under the Federal Clean Air Act. This permit does not contain any air pollutants under this category.

IV. CASE-BY-CASE DETERMINATIONS

No case-by-case determinations were required for this modification.

V. EMISSION OFFSET REQUIREMENTS

This modification is not subject to Emission Offset requirements.

VI. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

For each boiler in U2, the facility monitors fuel use as the surrogate for the long-term (TPY) emission limits for VOC, NO_x, CO, TSP, PM-10 and PM-2.5. Surrogate monitoring for the short-term (lb/hr) emission limits is combustion process adjustment for NO_x and CO.

3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
 - Equipment size and capacity limitations,
 - Subject equipment being permitted at the maximum rated capacity,
 - There is no specific state or Federal standard that applies to this piece of equipment,
 - Not a pollutant of concern for this piece of equipment,
 - Agreements with EPA on the frequency of testing and monitoring for combustion sources.

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VII. APPLICABLE STATE AND FEDERAL RULES

This modification is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

This modification is also subject to Federal regulations listed below.

NSPS Subpart A:	General Provisions
NSPS Subpart Dc:	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
NSPS Subpart IIII:	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The Greenhouse Gas (GHG) emissions from this facility are 30,390 TPY CO₂e and there is no GHG emissions increase. This modification is not subject to PSD rules at 40 CFR 52.21.

VIII. FACILITY'S COMPLIANCE STATUS

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Prior to the expiration of the Operating Permit's five-year term, the facility will be required to apply for a renewal, at which time the Department will evaluate the facility and issue a public notice with its findings.

IX. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

FACILITY NAME (FACILITY ID NUMBER)
BOP050001

Activity Number assigned
by the Department

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit Number
assigned by the Facility

Brief description of
emission unit

Emission Unit: U40 Sewage Sludge Incinerators
Operating Scenario: OS Summary

OR

OS2 Fluidized Bed Incinerator

OS Summary lists all rules and requirements
that apply to an emission unit. An emission unit
may contain one or more pieces of equipment
and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules
and requirements that apply to a scenario. An operating
scenario represents various ways (or scenarios) a piece of
equipment is permitted to operate.

Item
Number

Description of applicable
requirement

Monitoring method to
ensure compliance

Recordkeeping to show
facility's compliance

Actions and submittals
required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for
applicable requirement

Rule citation for
monitoring requirement

Rule citation for
recordkeeping requirement

Rule citation for submittal/
action requirement

Explanation Sheet for Facility Specific Requirements