



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

Facility Identification Data

Name: U S SALT - WATKINS GLEN REFINERY

Address: 3580 SALT POINT RD

WATKINS GLEN, NY 14891

Owner/Firm

Name: U S SALT LLC

Address: 2 BRUSH CREEK BLVD

KANSAS CITY, MO 64112, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: ROBERT B CALL

Address: NYSDEC - Region 8

6274 E Avon-Lima Rd

Avon, NY 14414

Phone:5852265396

Division of Air Resources:

Name: DANIEL E WALSH

Address: 6274 EAST AVON-LIMA RD

AVON, NY 14414

Phone:5852262466

Air Permitting Contact:

Name: ROBERT TRAVER

Address: US SALT LLC

SALT POINT RD - PO BOX 110

WATKINS GLEN, NY 14891-0110

Phone:6075352721

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

Attainment Status

U S SALT - WATKINS GLEN REFINERY is located in the town of READING in the county of



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016**

SCHUYLER.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

This facility refines and packages salt from nearby brine fields. Four boilers provide process and heating steam for the facility. Other emission sources include salt processing dust collection systems. Note that HAP emissions listed in the facility emission summary are insignificant emissions resulting from the combustion sources.

Permit Structure and Description of Operations

The Title V permit for U S SALT - WATKINS GLEN REFINERY

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

U S SALT - WATKINS GLEN REFINERY is defined by the following emission unit(s):

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

Emission unit 1SALTP -

Emission unit 1SALTP is associated with the following emission points (EP):

00002, 00004, 00005, 00006, 00012, 00014, 00015, 00016

Process: SP1 is located at 1ST&2ND, Building 3 - SP1 CONSISTS OF THE PRODUCTION OF GRANULATED AND PURIFIED SALT. EMISSION POINTS INCLUDE: EP00004-A-TRAIN ROTOCLONE. EP00005-HEIL SEPARATOR/DEMISTER FOR DEWATERING AND DRYING SALT. EP00015-B-TRAIN ROTOCLONE.

Process: SP2 is located at 1ST&2ND, Building 4 - PROCESS SP2 CONSISTS OF STORAGE AND PACKAGING OF THE SALT PRODUCTS. EMISSION POINTS INCLUDE: EP00002-ROTOCLONE FOR BUILDING 18 STORAGE SILOS, SCALPING SCREEN, SCALES, AND LOAD OUT. EP00006-ROTOCLONE FOR BUILDING 5 BAGGING OPERATIONS. EP00012-ROTOCLONE FOR BUILDING 11B STORAGE SILOS, SCALPING SCREEN, AND BAGGING MACHINES. EP00014-LARGE TUBEJET FOR PACKAGING 26 OZ LINE.

Emission unit 1BOILS - Four boilers (units 1, 7, 8 and 9) which provide process and heating steam for the facility. Unit 1 is a 103 MMBtu/hr heat input, natural gas fired boiler. Units 7 and 8 are each rated at 72.8 MMBtu/hr, firing primarily natural gas with No. 2 fuel oil as a back up. Unit 9 is a 240 MMBtu/hr heat input fluidized bed boiler firing coal, wood, natural gas or combinations of these fuels.

Emission unit 1BOILS is associated with the following emission points (EP):

00001, 00018

Process: BC1 Fluidized bed boiler firing bituminous coal. Natural gas or other fuels may be used during startup, shutdown or other times of transition between processes.

Process: BC2 is located at Building 1 - Fluidized bed boiler firing bituminous coal and wood materials and natural gas.

Process: BC3 is located at Building 1 - Fluidized bed boiler firing wood materials. Natural gas or other fuels may be used during startup, shutdown or other times of transition between processes.

Process: BC4 is located at Building 1 - Fluidized bed boiler firing natural gas.

Process: U1G is located at 1ST FLOOR, Building 1 - PROCESS U1G CONSISTS OF UNIT 1 (103 MMBTU/HR) BURNING NATURAL GAS AS THE PRIMARY FUEL.

Process: U7G is located at 1ST FLOOR, Building 1 - PROCESS U7G CONSISTS OF UNITS 7 AND 8 (72.8 MMBTU/HR EACH) BURNING NATURAL GAS AS THE PRIMARY FUEL. ALL PROCESS APPLICABLE REQUIREMENTS AND REPORTED PROCESS EMISSIONS APPLY TO EACH BOILER, UNLESS OTHERWISE NOTED.

Process: U7O is located at 1ST FLOOR, Building 1 - PROCESS U7O CONSISTS OF UNITS 7 AND 8 (72.8 MMBTU/HR EACH) BURNING FUEL OIL AS THE PRIMARY FUEL. ALL PROCESS APPLICABLE REQUIREMENTS AND REPORTED PROCESS EMISSIONS APPLY TO EACH BOILER, UNLESS OTHERWISE NOTED.

Title V/Major Source Status



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016**

on the following information:

This facility is major based on potential and actual particulate emissions greater than 100 tpy as well as potential oxides of nitrogen emissions of greater than 100 tpy.

Program Applicability

The following chart summarizes the applicability of U S SALT - WATKINS GLEN REFINERY with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016**

after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

2899

CHEMICAL PREPARATIONS, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description

1-02-002-18

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016

1-02-005-02	INDUSTRIAL BOILER - SUBBITUMINOUS COAL ATMOSPHERIC FLUIDIZED BED COMBUSTION - CIRCULATING BED (BITUM COAL)
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-009-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Wood/Bark-Fired Boiler (> 50,000 LB STM)
1-03-006-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS Over 100 MMBtu/Hr
3-05-021-01	MINERAL PRODUCTS MINERAL PRODUCTS - SALT MINING General

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
007440-38-2	ARSENIC	> 0	but < 10 tpy
000071-43-2	BENZENE	> 0	but < 10 tpy
007440-41-7	BERYLLIUM	> 0	but < 10 tpy
007440-43-9	CADMIUM	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 50	tpy but < 100 tpy
007440-47-3	CHROMIUM	> 0	but < 10 tpy
007440-48-4	COBALT	> 0	but < 10 tpy
000071-55-6	ETHANE, 1,1,1-	> 0	but < 10 tpy
	TRICHLORO		
000100-41-4	ETHYLBENZENE	> 0	but < 10 tpy



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

000050-00-0	FORMALDEHYDE	> 0 but < 10 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
007439-96-5	MANGANESE	> 0 but < 10 tpy
007439-97-6	MERCURY	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 100 tpy but < 250 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10	>= 250 tpy but < 75,000 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS	> 0 but < 10 tpy
007704-34-9	SULFUR	>= 25 tpy but < 40 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy but < 75,000 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY100-00-0	TOTAL HAP	> 0 but < 2.5 tpy
0NY998-00-0	VOC	>= 2.5 tpy but < 10 tpy
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

- Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)**
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016

of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator 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.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
--			
FACILITY	ECL 19-0301	141	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.11	42	General provisions - compliance with standards and maintenance requirements
FACILITY	40CFR 60-A.12	43	General provisions - Circumvention
FACILITY	40CFR 60-A.13	44	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.14	45	General provisions - Modification
FACILITY	40CFR 60-A.15	46	General provisions - Reconstruction
1-BOILS	40CFR 60-A.4	59	General provisions - Address
FACILITY	40CFR 60-A.7(a)	27	Notification and Recordkeeping
1-BOILS	40CFR 60-A.7(a)	60	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(b)	28	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(c)	29	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(d)	30	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(e)	31	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(f)	32	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(g)	33	Notification and Recordkeeping
FACILITY	40CFR 60-A.8(a)	34	Performance Tests
FACILITY	40CFR 60-A.8(b)	35, 36	Performance Tests
FACILITY	40CFR 60-A.8(c)	37	Performance Tests
FACILITY	40CFR 60-A.8(d)	38	Performance Tests
FACILITY	40CFR 60-A.8(e)	39	Performance Tests
FACILITY	40CFR 60-A.8(f)	40	Performance Tests
FACILITY	40CFR 60-A.9	41	General provisions - Availability of information
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.42b(a)	67	Standard for Sulfur Dioxide Firing Coal and/or Oil.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.42b(a)	84	Standard for Sulfur Dioxide Firing Coal and/or Oil.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.42b(e)	68	Standard for Sulfur Dioxide Averaging Period.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.42b(e)	85	Standard for Sulfur Dioxide Averaging Period.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.42b(e)	100	Standard for Sulfur

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016

1-BOILS/-/BC1/UNIT9	40CFR 60-Db.42b (g)	69	Dioxide Averaging Period.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.42b (g)	86	Standard for Sulfur Dioxide Period of Requirements.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.42b (g)	101	Standard for Sulfur Dioxide Period of Requirements.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.43b (a) (1)	70	Standard for Particulate Matter Firing Coal
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.43b (a) (2)	87	Standard for Particulate Matter Firing Coal and 10% or More of Other Fuel.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.43b (c) (1)	88	Standard for Particulate Matter Firing Greater Than 30% Wood.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.43b (e)	71	Standard for Particulate Matter Capacity Factor.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.43b (e)	89	Standard for Particulate Matter Capacity Factor.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.43b (e)	102	Standard for Particulate Matter Capacity Factor.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.43b (f)	72, 73	Standard for Particulate Matter Opacity.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.43b (f)	90, 91	Standard for Particulate Matter Opacity.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.43b (f)	103, 104	Standard for Particulate Matter Opacity.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.43b (f)	113, 114	Standard for Particulate Matter Opacity.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.43b (g)	74	Standard for Particulate Matter Exemption.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.43b (g)	92	Standard for Particulate Matter Exemption.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.43b (g)	105	Standard for Particulate Matter Exemption.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.43b (g)	115	Standard for Particulate Matter Exemption.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.44b (a) (1)	116	Standard for Nitrogen Oxides Firing Natural Gas and Distillate Oil. (see narrative)
1-BOILS/-/BC2	40CFR 60-Db.44b (b)	82	Standard for Nitrogen Oxides Firing Mixtures of Coal, Oil, and Natural Gas.

**New York State Department of Environmental Conservation
Permit Review Report**



Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

1-BOILS/-/BC1/UNIT9	40CFR 60-Db.44b (h)	75	Standards for Nitrogen Oxides Provisions.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.44b (h)	93	Standards for Nitrogen Oxides Provisions.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.44b (h)	106	Standards for Nitrogen Oxides Provisions.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.44b (h)	117	Standards for Nitrogen Oxides Provisions.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.44b (i)	76	Averaging Period.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.44b (i)	94	Averaging Period.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.44b (i)	107	Averaging Period.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.44b (i)	118	Averaging Period.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.44b (l)	77	Standard for Nitrogen Oxides.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.44b (l)	95	Standard for Nitrogen Oxides.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.44b (l)	108	Standard for Nitrogen Oxides.
1-BOILS	40CFR 60-Db.45b	61	Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.
1-BOILS	40CFR 60-Db.45b (c)	62	Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.46b	78	Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.46b	96	Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.46b	109	Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.46b	119	Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides.
1-BOILS	40CFR 60-Db.47b	63	Emission Monitoring for Sulfur Dioxide.
1-BOILS/-/BC1	40CFR 60-Db.47b (a)	66	Emission Monitoring for Sulfur Dioxide.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

1-BOILS/-/BC2	40CFR 60-Db.47b (a)	83	Emission Monitoring for Sulfur Dioxide.
1-BOILS	40CFR 60-Db.48b	64	Emissions Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.48b (a)	79	Emissions Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.48b (a)	97	Emissions Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.48b (a)	110	Emissions Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.48b (a)	120	Emissions Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.48b (b)	80	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.48b (b)	98	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.48b (b)	111	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.48b (b)	121	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC1/UNIT9	40CFR 60-Db.48b (c)	81	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC2/UNIT9	40CFR 60-Db.48b (c)	99	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC3/UNIT9	40CFR 60-Db.48b (c)	112	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS/-/BC4/UNIT9	40CFR 60-Db.48b (c)	122	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
1-BOILS	40CFR 60-Db.49b	65	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 63-JJJJJJ	47	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016

FACILITY	40CFR 63-ZZZZ	48	Area Sources Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	142	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 49, 50	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201- 6.4 (c) (3) (ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (d) (4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7	51	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	23	General Prohibitions - air pollution prohibited



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

1-SALTP/00002	6NYCRR 212.4 (c)	128, 129	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP/00004	6NYCRR 212.4 (c)	130, 131	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP/00005	6NYCRR 212.4 (c)	132	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP/00006	6NYCRR 212.4 (c)	133, 134	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP/00012	6NYCRR 212.4 (c)	135, 136	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP/00014	6NYCRR 212.4 (c)	137	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP/00015	6NYCRR 212.4 (c)	138, 139	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP/00016	6NYCRR 212.4 (c)	140	General Process Emission Sources - emissions from new processes and/or modifications
1-SALTP	6NYCRR 212.6 (a)	127	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (c)	24	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2 (g)	25	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.6	26	Reports, Sampling, and Analysis
1-BOILS	6NYCRR 227-1.3 (a)	55	Smoke Emission Limitations.
1-BOILS/-/U1G/UNIT1	6NYCRR 227- 2.4 (b) (1) (ii)	123	2010 NOx RACT presumptive limits.
1-BOILS/00001	6NYCRR 227-2.4 (b) (2)	126	NOx requirements.
1-BOILS/-/U7G	6NYCRR 227- 2.4 (c) (1) (ii)	124	2010 NOx RACT presumptive limit.
1-BOILS/-/U7O	6NYCRR 227- 2.4 (c) (1) (ii)	125	2010 NOx RACT presumptive limit.
1-BOILS	6NYCRR 227-2.6 (a)	56	Applicable testing and/or monitoring requirements.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

1-BOILS

6NYCRR 231-2.6

57, 58

Emission reduction
credits

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, U S SALT - WATKINS GLEN REFINERY has been determined to be subject to the following regulations:

40 CFR 60.11

This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40 CFR 60.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

standards by any means.

40 CFR 60.13

This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40 CFR 60.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40 CFR 60.15

This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.42b (a)

This regulation calls for a 90% reduction in the emissions of sulfur dioxide from facilities that burn coal or oil.

40 CFR 60.42b (e)

40 CFR 60.42b (g)

This subdivision contains a statement that all sulfur dioxide control requirements apply at all times.

40 CFR 60.43b (a) (1)

This regulation requires the emissions of particulate matter from facilities that burn coal to be less than 0.051 pounds of particulates per million BTU heat input.

40 CFR 60.43b (a) (2)

40 CFR 60.43b (c) (1)

40 CFR 60.43b (e)



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

40 CFR 60.43b (f)

This regulation specifies maximum allowable opacity for affected affected sources. The opacity of the emission may not exceed 20%, except for one six minute period when the maximum opacity may not exceed 27%.

40 CFR 60.43b (g)

This regulation specifies that the particulate matter and opacity standards apply at all times, except during periods of startup, shutdown or malfunction.

40 CFR 60.44b (a) (1)

These standards apply to all boilers firing natural gas and/or distillate oil except as provided in 40 CFR 60.44b(a)(4) Duct Burners Used in a Comdined Cycle System.

40 CFR 60.44b (b)

40 CFR 60.44b (h)

This regulation specifies that the NSPS nitrogen oxide standards apply at all time including periods of startup, shutdown, or malfunction.

40 CFR 60.44b (i)

This subdivision requires that the facility use a 30 day rolling average to determine compliance with any applicable standards in this Subpart.

40 CFR 60.44b (l)

40 CFR 60.45b

This regulation sets forth the analytical methods to be used to determine the emissions of sulfur dioxide.

40 CFR 60.45b (c)

40 CFR 60.46b

This section sets the compliance and performance test methods and procedures for emissions of particulate matter and oxides of nitrogen.

40 CFR 60.47b



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

40 CFR 60.47b (a)

This regulation requires the owner or operator to install a continuous emissions monitor (CEM) to monitor the emissions of sulfur dioxide.

40 CFR 60.48b

40 CFR 60.48b (a)

This subdivision requires the installation of a continuous opacity monitor.

40 CFR 60.48b (b)

This regulation requires the owner or operator of the facility to install and operate a continuous emissions monitor to monitor emissions of oxides of nitrogen from the facility.

40 CFR 60.48b (c)

This regulation requires that the continuous monitoring system (CMS) and data recorder for nitrogen oxides be operated during all periods of operation of the affected facility except for CMS breakdowns and repairs. Data must be recorded during calibration checks, and zero and span adjustments.

40 CFR 60.49b

This rule specifies the reporting and recordkeeping requirements for affected steam generating units.

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40 CFR 60.7 (c)

This requirement details the information to be submitted in excess emissions and monitoring systems performance reports which must be submitted at least semi-annually for sources with compliance monitoring systems.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

40 CFR 60.7 (d)

This condition specifies the required information and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40 CFR 60.7 (e)

This condition specifies how sources that remain in continuous compliance, and are subject to monthly or quarterly reporting, can reduce reporting frequency to semiannually.

40 CFR 60.7 (f)

This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 60.7 (g)

This condition allows source owners to use reporting required for state or local agencies to satisfy the paragraph (a) reporting requirements of this section of this rule.

40 CFR 60.8 (a)

This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner or operator of the facility must conduct performance test(s) and furnish a written report of the test results.

40 CFR 60.8 (b)

This regulation contains the requirements for Performance test methods and procedures, to be used by the owner or operator, of the affected facility.

40 CFR 60.8 (c)

This condition contains the requirements for operating conditions, of the emission source, during performance testing.

40 CFR 60.8 (d)

This regulation contains the requirements for advance notification of Performance (stack) testing.

40 CFR 60.8 (e)

This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

40 CFR 60.8 (f)

This regulation requires that Performance (stack) tests consist of three runs unless otherwise specified. The rule also designates the allowable averaging methods for the analysis of the results.

40 CFR 60.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

40 CFR Part 63, Subpart ZZZZ

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 225-1.2 (c)

Sulfur-in-fuel limitations for solid fuel fired facilities on or after July 1, 2014.

6 NYCRR 225-1.2 (g)

Sulfur-in-fuel limitations for the purchase of distillate oil on or after July 1, 2014.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

6 NYCRR 225-1.6

This section establishes the requirements for reporting, sampling, and analyzing fuel by subject facilities.

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 227-2.4 (b) (1) (ii)

Future NO_x RACT presumptive limits effective 7/1/14.

6 NYCRR 227-2.4 (b) (2)

NO_x requirements for large boilers with configurations other than those listed in 227-2.4(a)(1).

6 NYCRR 227-2.4 (c) (1) (ii)

Future NO_x RACT presumptive limit effective 7/1/14.

6 NYCRR 227-2.6 (a)

Applicable testing and/or monitoring requirements for emission sources subject to NO_x RACT.

6 NYCRR 231-2.6

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016**

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

Compliance Certification

Summary of monitoring activities at U S SALT - WATKINS GLEN REFINERY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	29	record keeping/maintenance procedures
1-BOILS/-/BC1/UNIT9	67	record keeping/maintenance procedures
1-BOILS/-/BC2/UNIT9	84	record keeping/maintenance procedures
1-BOILS/-/BC1/UNIT9	70	intermittent emission testing
1-BOILS/-/BC1/UNIT9	72	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC1/UNIT9	73	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC2/UNIT9	90	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC2/UNIT9	91	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC3/UNIT9	103	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC3/UNIT9	104	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC4/UNIT9	113	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC4/UNIT9	114	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC4/UNIT9	116	continuous emission monitoring (cem)
1-BOILS/-/BC1/UNIT9	77	intermittent emission testing
1-BOILS/-/BC2/UNIT9	95	intermittent emission testing
1-BOILS/-/BC3/UNIT9	108	intermittent emission testing
1-BOILS	61	record keeping/maintenance procedures
1-BOILS	62	record keeping/maintenance procedures
1-BOILS	63	record keeping/maintenance procedures
1-BOILS	64	record keeping/maintenance procedures
1-BOILS/-/BC1/UNIT9	79	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC2/UNIT9	97	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC3/UNIT9	110	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC4/UNIT9	120	monitoring of process or control device parameters as surrogate
1-BOILS/-/BC1/UNIT9	80	continuous emission monitoring (cem)
1-BOILS/-/BC2/UNIT9	98	continuous emission monitoring (cem)
1-BOILS/-/BC3/UNIT9	111	continuous emission monitoring (cem)
1-BOILS/-/BC4/UNIT9	121	continuous emission monitoring (cem)
1-BOILS/-/BC1/UNIT9	81	record keeping/maintenance procedures
1-BOILS/-/BC2/UNIT9	99	record keeping/maintenance procedures
1-BOILS/-/BC3/UNIT9	112	record keeping/maintenance procedures
1-BOILS/-/BC4/UNIT9	122	record keeping/maintenance procedures
1-BOILS	65	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-4432-00001/00031
Renewal Number: 2
04/01/2016

1-BOILS	52	monitoring of process or control device parameters as surrogate
1-BOILS	53	monitoring of process or control device parameters as surrogate
1-BOILS	54	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
1-SALTP/00002	128	monitoring of process or control device parameters as surrogate
1-SALTP/00002	129	monitoring of process or control device parameters as surrogate
1-SALTP/00004	130	monitoring of process or control device parameters as surrogate
1-SALTP/00004	131	monitoring of process or control device parameters as surrogate
1-SALTP/00005	132	monitoring of process or control device parameters as surrogate
1-SALTP/00006	133	monitoring of process or control device parameters as surrogate
1-SALTP/00006	134	monitoring of process or control device parameters as surrogate
1-SALTP/00012	135	monitoring of process or control device parameters as surrogate
1-SALTP/00012	136	monitoring of process or control device parameters as surrogate
1-SALTP/00014	137	monitoring of process or control device parameters as surrogate
1-SALTP/00015	138	monitoring of process or control device parameters as surrogate
1-SALTP/00015	139	monitoring of process or control device parameters as surrogate
1-SALTP/00016	140	monitoring of process or control device parameters as surrogate
1-SALTP	127	monitoring of process or control device parameters as surrogate
FACILITY	24	work practice involving specific operations
FACILITY	25	work practice involving specific operations
FACILITY	26	record keeping/maintenance procedures
1-BOILS	55	monitoring of process or control device parameters as surrogate
1-BOILS/-/U1G/UNIT1	123	intermittent emission testing
1-BOILS/00001	126	continuous emission monitoring (cem)
1-BOILS/-/U7G	124	intermittent emission testing
1-BOILS/-/U7O	125	intermittent emission testing
1-BOILS	56	record keeping/maintenance procedures
1-BOILS	57	record keeping/maintenance procedures
1-BOILS	58	intermittent emission testing

Basis for Monitoring

Condition 5 requires reporting of compliance monitoring every six months based on the requirements of 6 NYCRR Part 201-6.4(c)(3)(ii) and 40 CFR 70.6(a)(3)(iii).

Condition 6 requires annual reporting of compliance status of each individual permit condition based on the requirements of 6 NYCRR Part 201-6.4(e) and 40 CFR 70.6(c)(5).

Condition 7 requires the submission of a statement of actual emissions based on the requirements of 6 NYCRR Part 202-2.1 and 40 CFR 70.9(a) and (b)(2).

Condition 24 specifies limits for sulfur content in coal on a daily, three month and annual average as



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

required in 6 NYCRR Part 225-1.2(c).

Condition 25 specifies limit of sulfur content in distillate oil purchased after July 1, 2014 as stated in 6 NYCRR Part 225-1.2(g).

Condition 26 requires sampling, analysis and reporting to monitor sulfur content in fuel as specified in 6 NYCRR Part 225-1.6.

Condition 29 requires submission of excess emissions reports semiannually based on the 40 CFR 60.7(c).

Conditions 52, 53 and 54 cap the increases in total facility emissions for the boiler operations, Emission Unit 1-BOILS, below the applicability thresholds for New Source Review, 6 NYCRR Part 231-2, and Prevention of Significant Deterioration, 40 CFR 52.21. This is accomplished by limiting the total combustion of a combination of fuels. The limits are based on emission factors for oxides of nitrogen, sulfur dioxide and carbon monoxide published by USEPA, and require emission control equipment for oxides of nitrogen and particulates. The capping is enabled under the provisions of 6 NYCRR Part 201-7.

Condition 55 limits boiler opacity emissions as specified in 6 NYCRR Part 227-1.3(a).

Condition 56 specifies testing, monitoring and reporting requirements for emissions of oxides of nitrogen as stated in 6 NYCRR Part 227-2.6(a).

Conditions 57 and 58 is a cap on oxides of nitrogen emissions previously accepted by the permit holder. This cap was requested to create emission reduction credits which the permit holder subsequently transferred to another facility. The emissions reduction credits were generated in 1997 and documented under 6 NYCRR Part 231-2.6. The applicable rule has been modified; the correct citation as of the date of issue of this permit is 6 NYCRR Part 231-2.12.

Condition 61 references applicable procedures and performance test methods to monitor compliance with the specified limits for sulfur dioxide emissions. These provisions are contained in 40 CFR 60.45b.

Condition 62 specifies applicable procedures and calculations to monitor compliance with the specified limits for sulfur dioxide emissions as specified in 40 CFR 60.45b(c).

Condition 63 references sulfur dioxide emission monitoring requirements under 40 CFR 60.47b.

Condition 64 references oxides of nitrogen and particulate emission monitoring requirements under 40 CFR 60.48b.

Condition 65 references reporting and record keeping requirements for demonstrating compliance with emission limits for sulfur dioxide, oxides of nitrogen and particulates. Referenced items are contained in 40 CFR 60.49b.

Conditions 67 and 84 set emission limits for sulfur dioxide for combustion of wood in the fluidized bed boiler as specified in 40 CFR 60.42b(a).

Condition 70 sets emission limits for particulates for combustion of coal in the fluidized bed boiler as specified in 40 CFR 60.43b(a)(1).



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

Renewal Number: 2

04/01/2016

Conditions 72, 73, 90, 91, 103, 104, 113 and 114 set opacity emission limits as specified in 40 CFR 60.43b(f).

Conditions 77, 95 and 108 set the emission limit for oxides of nitrogen for equipment built after July 9, 1997 as required by 40 CFR 60.44b(l).

Conditions 79, 97, 110 and 120 require continuous emission monitoring of opacity emissions as specified in 40 CFR 60.48b(a).

Conditions 80, 98, 111 and 121 require continuous emission monitoring of oxides of nitrogen emissions as specified in 40 CFR 60.48b(b).

Conditions 81, 99, 112, 122 require operation of the oxides of nitrogen continuous emission monitoring equipment at all times while the boiler is operating as specified by 40 CFR 60.48b(c).

Condition 116 sets emission limits for oxides of nitrogen for combustion of natural gas in the fluidized bed boiler as specified in 40 CFR 60.44b(a)(1).

Condition 123 sets an oxides of nitrogen emission limit and requires testing to demonstrate compliance as specified by 6 NYCRR Part 227-2.4(b)(1)(ii).

Conditions 124 and 125 set emission limits for oxides of nitrogen for combustion of distillate oil and natural gas as specified in 6 NYCRR Part 227-2.4(c)(1)(ii).

Condition 126 provides a temporary emission limit for oxides of nitrogen from the fluidized bed boiler until testing during continuous production operation can establish a new RACT limit as required by 6 NYCRR Part 227-1.4(b)(2)

Condition 127 limits opacity emissions from salt processing operations based on 6 NYCRR Part 212.6(a).

Conditions 128, 131, 133, 136, 137 and 139 specify monitoring pressure drop of wet scrubber liquid as an indicator of scrubber liquid flow that controls salt processing particulate emissions as required by 6 NYCRR Part 212.4(c).

Conditions 129, 130, 132, 134, 135 and 138 specify monitoring of wet scrubber liquid salt concentration to control process particulate emissions as required by 6 NYCRR Part 212.4(c).

Condition 140 specifies monitoring wet scrubber liquid flow to control salt processing particulate emissions as required by 6 NYCRR Part 212.4(c).

Condition 129 specifies monitoring of salt concentration in liquid mist controlled by demister to control process particulate emissions as required by 6 NYCRR Part 212.4(c).

Condition 134 specifies monitoring pressure drop across bag house that controls particulate emissions from salt processing operation as required by 6 NYCRR Part 212.4(c).

Condition 139 requires stack testing to determine emissions of oxides of nitrogen and continuous monitoring of those emissions during operation as specified in 6 NYCRR Part 227-2.6.

Condition 140 specifies a limit for emissions of oxides of nitrogen as contained in 6 NYCRR Part 227-



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 8-4432-00001/00031

**Renewal Number: 2
04/01/2016**

2.4(b)(1)(ii).