

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

**Facility Identification Data**

Name: U S SALT - WATKINS GLEN REFINERY

Address: 3580 SALT POINT RD

Reading, NY 14891

**Owner/Firm**

Name: US SALT, LLC

Address: 3580 SALT POINT RD

WATKINS GLEN, NY 14891, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

Name: ASHLEY N RUBACHA

Address: NYS DEC - REGION 8

6274 E AVON LIMA RD

AVON, NY 14414-9519

Phone:

Division of Air Resources:

Name: MOLLY SWEARINGEN

Address: 6274 E AVON LIMA RD

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Air Permitting Contact:

Name: David Crea

Address: 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 a modification to the Air Title V permit. US Salt is planning to install a back-up generator with a maximum heat input of 2,500 kW xto provide power to the facility. They also propose to remove the ammonia storage tank from emission unit 1-TANK.

**Attainment Status**

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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

The US Salt LLC-Watkins Glen Refinery is located on the shore of Seneca Lake in Schuyler County, NY. This facility refines and packages salt from nearby brine fields. Three boilers provide process and heating steam for the facility. The facility has a backup generator to run in case of an outage of boilers.

**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.

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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

Emission unit 1GEN01 - This emission unit includes backup generator operations which provide black start capabilities to the US Salt plant in the event of an outage as well as parallel with one or both existing steam turbines in order to provide continuous power for various maintenance activities where one or both steam turbines need to be offline.

Emission unit 1GEN01 is associated with the following emission points (EP):  
00017

Process: GEN is located at Building OUTSIDE - This process consists of the operation of the Caterpillar natural gas backup generator set, model G3520, that exhausts to emission point 00017.

Emission unit 1BOILS - Three boilers (units 1, 7, and 8) 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. Units 7 and 8 are operated as natural gas-fired boiler as defined in 40 CFR 63.11237, so they are not subject to 40 CFR Subpart 63, Subpart JJJJJJ.

Emission unit 1BOILS is associated with the following emission points (EP):  
00018

Process: U1G is located at BOILER ROOM - Process U1G consists of Unit 1 (103MMBtu/hr) boiler burning natural gas as the primary fuel.

Process: U7G is located at BOILER ROOM - Process U7G consists of units 7 and 8 (72.8 MMBtu/hr) boilers 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 BOILER ROOM - Process U7O consists of Units 7 and 8 (72.8 MMBtu/hr) boilers each burning fuel oil as the primary fuel. All process applicable requirements and reported emissions apply to each boiler unless otherwise noted.

Emission unit 1TANKS - This emission unit includes one 19% aqueous ammonia tank and one 50% sodium hydroxide tank.

Emission unit 1TANKS is associated with the following emission points (EP):  
TANK2

Process: TK2 This process covers one 12,000 gallon storage tank containing 50% sodium hydroxide.

Emission unit 1SALTP - Salt processing and packaging operations. Raw brine is refined to produce granulated salt or purified salt, which is then packaged on site.

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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 -

Process: SP2 is located at 1ST&2ND, Building 4 -

**Title V/Major Source Status**

U S SALT - WATKINS GLEN REFINERY is subject to Title V requirements. This determination is based on the following information:

US Salt is major source, because it's PTE for particulates (165 tpy) and carbon monoxide (160 tpy) being above the major source threshold for each contaminant mentioned (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	NO
SIP	YES

**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52.21, 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

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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.

<b>SIC Code</b>	<b>Description</b>
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.

<b>SCC Code</b>	<b>Description</b>
1-02-005-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
2-01-002-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating
3-05-021-01	MINERAL PRODUCTS MINERAL PRODUCTS - SALT MINING General
3-99-999-99	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES SEE COMMENT **

**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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000630-08-0	CARBON MONOXIDE		160		82
0NY210-00-0	OXIDES OF NITROGEN	199800			64
0NY075-00-0	PARTICULATES		165		126
0NY075-00-5	PM-10		154		125
007446-09-5	SULFUR DIOXIDE		1.4		0.46
0NY100-00-0	TOTAL HAP		10		4
0NY998-00-0	VOC		31		12

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: 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 B: 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 C: 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 D: 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 E: 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.

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

**Item F: 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 G: 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 H: 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 of a challenge, the remainder of this permit shall continue to be valid.

**Item I: 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 J: 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



**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

Department pursuant to the provisions of Part 2 01-6.7 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.

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 K: 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 L: 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: 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

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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.
  
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item\_02

**Item B: 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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
----- -- FACILITY	ECL 19-0301	35	Powers and Duties of the Department with

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

FACILITY	40CFR 60-JJJJ	1	-11	respect to air pollution control Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
FACILITY	40CFR 63-ZZZZ	30, 1	-12	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	18		Chemical accident prevention provisions
FACILITY	40CFR 82-F	19		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 98	31		Mandatory Greenhouse Gas Reporting
FACILITY	6NYCRR 200.6	1		Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10		Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	1	-14	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	20, 32, 33, 1	-2, 1	Title V Permits and the Associated Permit Conditions
1-BOILS	6NYCRR 201-6	1	-13	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)	23		Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6		Compliance Certification
FACILITY	6NYCRR 201-6.4 (f)	1	-4	Operational Flexibility
FACILITY	6NYCRR 201-7	1	-5	Federally Enforceable

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

FACILITY	6NYCRR 202-1.1	1	-1	Emissions Caps Required emissions tests.
FACILITY	6NYCRR 202-2.4 (a) (3)	1	-7	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	8		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	24		General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.6 (a)	25		Limiting of Opacity
FACILITY	6NYCRR 212-2.4 (b)	38, 39, 40, 41, 1	-8	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9		Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (d)	27		Sulfur-in-Fuel Limitation - Distillate Oil
FACILITY	6NYCRR 227-1.3 (a)	1	-9	Particulate Emission Standards
FACILITY	6NYCRR 227-1.3 (c)	1	-10	Annual Tune-up Requirement
FACILITY	6NYCRR 227-1.4 (a)	28		Opacity Standard

**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

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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 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)

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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) (4)

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.

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 202-2.5

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 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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 their 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

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

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 Part 60, Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §60.4230, paragraphs (a)(1) through (6). Sources subject to Subpart JJJJ must comply with emission standards for nitrogen oxides, carbon monoxide, and volatile organic compounds.

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to reciprocating internal combustion engines. Sources subject to Subpart ZZZZ must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

40 CFR Part 98

40 CFR Part 98 sets forth the reporting requirements for facilities that are subject to the mandatory reporting of greenhouse gases.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 225-1.2 (d)

This subdivision sets the sulfur-in-fuel limitation for distillate oil fired emission sources throughout the State.

6 NYCRR 227-1.3 (a)

This subdivision sets the particulate matter emission standards for subject stationary combustion installations.

6 NYCRR 227-1.3 (c)

This subdivision requires that all stationary combustion installations subject to this subpart perform an annual tune-up.

6 NYCRR 227-1.4 (a)

This subdivisions sets the opacity standard for subject stationary combustion installations.

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 NOx.

**Compliance Certification**

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

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
---		
FACILITY	1-2	intermittent emission testing
FACILITY	1-3	intermittent emission testing
1-BOILS	1-13	monitoring of process or control device parameters



**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

FACILITY	5	as surrogate
FACILITY	6	record keeping/maintenance procedures
FACILITY	1-6	record keeping/maintenance procedures
		monitoring of process or control device parameters
		as surrogate
FACILITY	25	record keeping/maintenance procedures
FACILITY	1-8	monitoring of process or control device parameters
		as surrogate
FACILITY	38	monitoring of process or control device parameters
		as surrogate
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	monitoring of process or control device parameters
		as surrogate
FACILITY	41	monitoring of process or control device parameters
		as surrogate
FACILITY	27	work practice involving specific operations
FACILITY	1-9	record keeping/maintenance procedures
FACILITY	1-10	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters
		as surrogate

**Basis for Monitoring**

**201-6**

The limit proposed in the permit are presumptive RACT limits listed in Part 227-2.4(b) & (c), respectively for large gas-fired boilers must comply with the 0.06 lb NOx/MMBTU limit and medium size distillate oil/gas boilers must comply with the 0.08 lb NOx/MMBTU limit. These limits are proposed under 201-6 to prevent backsliding and to ensure that the facility emissions estimates remain accurate and below major source threshold for NOx. Testing routinely (once every 5 years) ensures that the emission estimates are accurate and ensures that the PTE stays below major source thresholds for NOx with the current sources or corrective action are necessary to meet the permit NOx limits.

The facility has emission reduction credits (ERC) resulting in a oxides of nitrogen (NOx) limit of 166.2 tons/year for emission unit boilers. Unit 1, the larger gas boiler has a limit of 81.2 tons/year of NOx and the smaller oil/gas boilers Unit 7 and Unit 8 have a limit 42.5 tons/year each. These limits must be maintained to keep the ERC. Compliance shall be reported on a semi-annual basis.

**201-7**

Oxides of Nitrogen have limited to below the major source (100 tpy) threshold to prevent the facility from becoming major for it. This prevents the facility from becomng applicable to major source requirements, such as New Source Review for Oxides of Nitrogen and the generator from being applicable to RACT.

**212-1.6(a)**

Compliance of the 20% opacity limit for process sources is observed through daily visual emission observations. The facility must preform corrective actions if there are any visual emissions above normal operation and an EPA method 9 test may be required to be preformed by the department.

**212-2.4.(b)**

These conditiona are in place to ensure that the facility is meeting the grain standard by having controls and ensurances in place. The facility is required to daily monitor the flow pressure and monthly monitor the salinity of the rotocylone control devices to ensure that particulate removal is taking place. Additionally the tubejet pressure drop, wet scrubber flow rate and the demister pad condition are monitored daily to ensure the control devices are working correctly.

**Division of Air Resources  
Permit Review Report**

**Permit ID: 8-4432-00001/00031**

**Renewal Number: 3**

**Modification Number: 1 12/23/2024**

**227-2.4(b)(1)**

To ensure that the RACT for oxides of nitrogen (NO<sub>x</sub>) is met under Part 227 for large boilers the facility must comply with the 0.06 lb NO<sub>x</sub>/MMBTU limit. Once every 5 year the facility will stack test to demonstrate compliance with the limit.

**227-2.4(c)(1)**

To ensure that the RACT for NO<sub>x</sub> is met under Part 227 for medium size boiler the facility must comply with the 0.08 lb NO<sub>x</sub>/MMBTU limit. Once every 5 years the facility will stack test to demonstrate compliance with the limit.