

Sanjay

Norlite Corporation



P.O. BOX 694 628 SO. SARATOGA ST. COHOES, N. Y. 12047 TEL.: (518) 235-0401

October 9, 1985

NYSDEC
Room 401
50 Wolf Road
Albany, New York 12233

Attn: Mr. John L. Middelkoop
Senior Sanitary Engineer
Bureau of Hazardous Waste

Dear Mr. Middelkoop:

Attached please find a copy of the revised USEPA hazardous waste permit application. You will recall that our original application listed D001 as the only EPA hazardous waste code. This revised application lists all wastes that we can accept according to our permit.

I have attached copies of the sections of the RCRA Part B Section C-Waste characteristics which explain the need for the revision to our permit. Mr. Jeffrey Schmitt of the NYSDEC Region IV Office will be reviewing our entire revised RCRA Part B. Application. I am also sending him a copy of this letter so that he will be aware of our discussions.

Please call me if you have any questions.

Yours very truly,

NOBLITE CORPORATION

JEFFREY C. FRAZER
Technical Director

cc: Jeffrey Schmitt, NYSDEC, Region IV

FORM 3 RCRA			U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION <i>Consolidated Permits Program</i> <small>(This information is required under Section 3005 of RCRA.)</small>		I. EPA I.D. NUMBER F N Y D 0 8 0 4 6 9 9 3 5																																																																																																																																																						
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Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.																																																																																																																																																											
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2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.																																																																																																																																																											
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EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.																																																																																																																																																											
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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. JZ	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
<div style="display: flex; justify-content: space-between;"> W N Y D O 8 0 4 6 9 9 3 5 T/A C 1 </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>												

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
				27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29
1	D 0 0 1	10,000	T	S 0 1	S 0 2	T 0 4					
2	F 0 0 1	4000	T	S 0 1	S 0 2	T 0 4					
3	F 0 0 2	4000	T	S 0 1	S 0 2	T 0 4					
4	F 0 0 3	4000	T	S 0 1	S 0 2	T 0 4					
5	F 0 0 5	4000	T	S 0 1	S 0 2	T 0 4					
6	D 0 0 4	1,000	T	S 0 1	S 0 2	T 0 4					
7	D 0 0 5	1,000	T	S 0 1	S 0 2	T 0 4					
8	D 0 0 6	1,000	T	S 0 1	S 0 2	T 0 4					
9	D 0 0 7	1,000	T	S 0 1	S 0 2	T 0 4					
10	D 0 0 8	1,000	T	S 0 1	S 0 2	T 0 4					
11	D 0 0 9	1,000	T	S 0 1	S 0 2	T 0 4					
12		Total estimated annual quantity of waste = 32000 tons									
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IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

T04 Process fuel lightweight aggregate kiln

The low grade (solvent) fuel is burned only for purposes of energy recovery. The facility is currently operating under interim status with approval to use solvents classified under EPA hazardous waste number D001. This application is a request to revise the permit to include the following EPA hazardous wastes:

D001, F001, F002, F003, F005, D004, D005, D006, D007, D008, D009.

Justification for this revision is given in RCRA Part B Permit Application (Revision 1) Section C-Waste Characteristics.

EPA I.D. NO. (enter from page 1)

5	F	N	Y	D	0	8	0	4	6	9	9	3	5	T/A	C	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	4	5	0	3	0
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

7	3	4	2	0	3	0
72	73	74	75	76	77	78

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E
15	16

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F
15	16

C	G
15	16

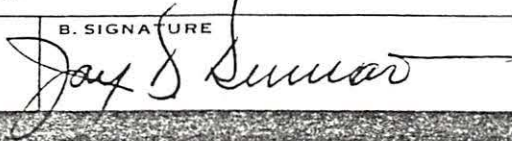
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

JAY D. DERMAN
EXECUTIVE VICE PRESIDENT

B. SIGNATURE



C. DATE SIGNED

10/8/85

X. OPERATOR CERTIFICATION

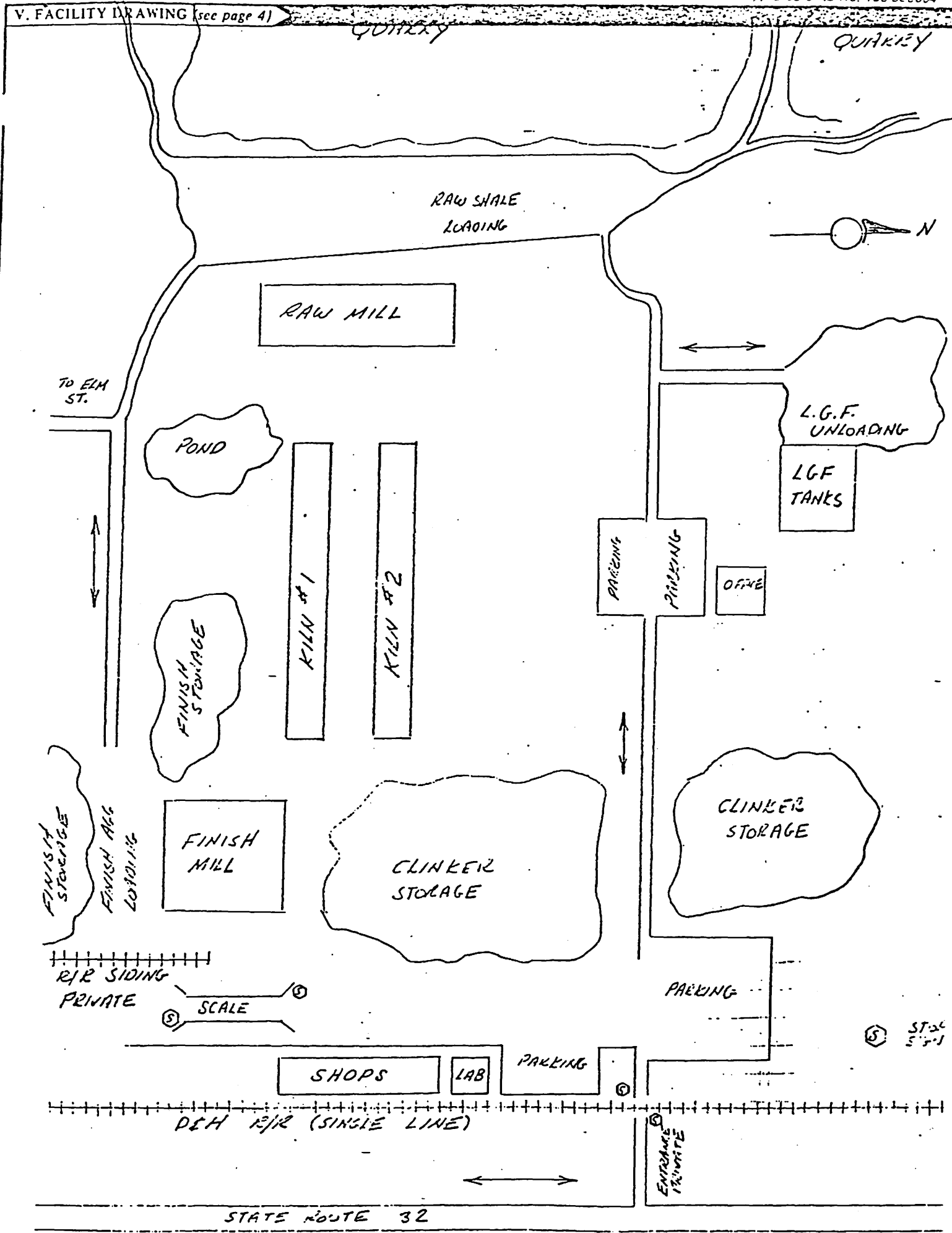
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)



C-1a Tanks Containing Low Grade Fuel

Norlite has developed a program to assure a proper identification of waste with a proper chemical and physical analysis. A Low Grade Fuel Specifications sheet is submitted by each supplier. Exhibit C-1 shows a copy of the Low Grade Fuel Specification sheet submitted by the Generator or Blender. This form describes information concerning the Generator or Blender, waste shipping information, waste description, waste source(s), waste analysis, and a list of any hazardous constituents as defined in 40CFR261 - Appendix VIII. The Form also requires a verification by the Generator that the information is accurate and that if any changes occur, the generator will notify Norlite promptly.

Norlite reviews these Low Grade Fuel Specifications to assure that the material to be received can meet the burning permit limits and the compatibility requirements. The following EPA Waste Codes are considered acceptable:

D001
F003
F005

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In addition, we will accept waste which may contain chlorine up to 5% which may be listed as a non-specific source waste (EPA Waste Number F001 or F002).

In addition, combustible waste that may have heavy metals content, which makes it characteristically hazardous (but not ignitable), is acceptable if the metal content is below the acceptance limit. These Waste Codes include the following:

<u>Metal</u>	<u>EPA Waste Code</u>	<u>Acceptance Limit</u>
Arsenic	D004	5.0 ppm
Barium	D005	1000. ppm
Cadmium	D006	150.0 ppm
Chromium	D007	1000. ppm
Lead	D008	1000. ppm
Mercury	D009	10. ppm

Specific listed non-acute hazardous chemical product wastes are accepted on a case by case basis if the waste is hazardous because of Ignitability or Toxicity, and is within the specification of legitimate Energy Recovery as defined in 40CFR 266. Listed hazardous chemical products which are hazardous because of Reactivity or Corrosivity are not

accepted. Acute hazardous chemical products are not accepted and hazardous wastes which are characteristically Corrosive or Reactive are not accepted as Low Grade Fuel at Norlite.

Low Grade Fuel (LGF) is ignitable with a flash point of 140 degrees Fahrenheit or lower. The LGF is not corrosive or reactive. However, LGF may be an EP Toxic waste as defined in 40CFR261 because the heavy metal concentration may exceed the limits set forth in 40CFR261.24.

As described in Norlite's Waste Analysis Plan, each LGF delivery is sampled using a coliwasa sampler. The sample is analyzed for specific gravity, BTU, total halogen content, compatibility, and solids by Norlite's on-site laboratory. A representative aliquot of the sample is separated to be sent to an off-site laboratory, as is described in the Waste Analysis Plan, for analysis for PCB and metal content. A third aliquot is stored for future reference. These samples are stored in an on-site powder magazine converted for this purpose. The samples are maintained for at least three years in accordance with permit regulation, or until any questions about the material have been resolved.

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WAP-1
WASTE ANALYSIS PLAN

STREAM	PARAMETER	ANALYTICAL METHOD	TECHNIQUE	DETECTION LIMIT	RATIONALE FOR PARAMETER	PERMIT LIMITS	ACCEPTANCE LIMITS	TOLERANCE LIMITS
Each load	Specific Gravity	Norlite SOP#2	Mass/Vol. Measure	+/- .001	Waste Verification Used in Calculation		1.20-.70	
Each load	Heat of Combustion	ASTM D240	Oxygen Bomb	5,000 BTU/gal	Assess Burning Efficiency Requirement	75,000 BTU/gallon	75,000 BTU/gallon	80,000 BTU/gallon
Each load	Total Organic Halogen Content	ASTM D808 (D2361)	Modified Titration Cl Probe	+/- .005	Chlorine Content Requirement	3.0%	5.0%	3.0%
Each load	Compatibility	Norlite SOP#3	Thermal Mixing	5 deg. C Temp. Rise	Assure Compatible Samples		10 deg. C Temp. Rise	5 deg. C Temp. Rise
Each load	Solid	ASTM D96	Evaporation	.005%	Assures Pumpability		10.0%	10.0%
Comp. of 5 loads	PCB	EPA Method 800/4-81-045	GC	5ppm	Verify no Presence of PCB	50ppm	25ppm	25ppm
Each tank	Sulfur Ash	ASTM 2622 ASTM 482	X-ray Thermal	.5% .5%	Verify Permit Limits	2.0% 8.0%		
Each tank	Arsenic Barium Beryllium Cadmium Chromium Copper Lead Mercury Nickel Selenium	SJ-846 EPA 7040 EPA 7080 EPA 7091 EPA 7130 EPA 7190 EPA 7210 EPA 7420 EPA 7470 EPA 7520 EPA 7740	AA AA AA AA AA AA AA AA AA AA AA	.1ppm 40ppm 1.5ppm 1ppm 5ppm 20ppm 5ppm 2ppm 40ppm 40ppm 1ppm	Verify Metals Below Permit Levels	1.7ppm 440ppm 15ppm 84ppm 490ppm 200ppm 680ppm 4.5ppm 440ppm 440ppm 0.36ppm	5.0ppm 1000ppm 30ppm 150ppm 1000ppm 400ppm 1000ppm 10ppm 1000ppm 1000ppm 1.0ppm	
Annual Gen	Corrosivity	SJ-846 Method 1110	Thermal Contact	.025mm/yr	Assure no tank corrosion		6.35/yr	Corrosive Liquids
Annual Gen	Volatiles Aromatic Organics	SJ-846 EPA 8020	GC	100ppm	Verify Constituents			
Annual Gen	Volatile Chlorinated Organics	SJ-846 EPA 8010	GC	100ppm	Verify Constituents		10%	
Annual Gen	Volatile Organics	SJ-846 EPA 8015	GC	100ppm	Verify Constituents			

* .1ppm detection limit was set based on method interference possibilities

EXHIBIT C-1

NORLITE

LOW GRADE FUEL SUPPLY SPECIFICATIONS

I. Generator/Blender

Name _____

Address _____

EPA ID _____

Contact Person _____

II. Waste Shipping Information

D.O.T. Name _____ D.O.T. Hazard Class _____

EPA Hazardous Waste No. _____ UN/NA No. _____

III. Waste Description - Indicate Volatile Organic Constituents Ranges in Excess of 10% (Aromatic Organics, Chlorinated Organics and Other Organics)

Maximum	Minimum
---------	---------

IV. Waste Source (Generator) - Describe Waste Stream

V. Waste Sources (Blender) -

For each Generator whose waste may be contained in blended fuel sent to Norlite:

On a separate sheet: Describe type of industry with SIC number and description of specific waste stream and all quantity allocated to the blended fuel program. Use % or gallons. Also provide documentation example of your screening program.

EXHIBIT C-1 (Continued)

VI. Waste Analysis

BTU _____ BTU/gal	Arsenic _____ ppm	Lead _____ ppm
Sulfur _____ %	Barium _____ ppm	Mercury _____ ppm
Chlorine _____ %	Beryllium _____ ppm	Nickel _____ ppm
Ash _____ %	Cadmium _____ ppm	Selenium _____ ppm
Solids _____ %	Chromium _____ ppm	Zinc _____ ppm
	Copper _____ ppm	PCB _____ ppm

Corrosivity _____ mm/year
(Steel)

VII. Does this waste contain: PCB, Herbicide, Pesticide, Cyanide or Sulfides?

VIII. Is this waste an acute hazardous waste as defined in

40CFR261.33(e) or 40CFR371.4(d)(5)

IX. List any of the Hazardous Constituents, 40CFR261 Appendix VIII

that may be present in the waste stream:

X. Describe any special handling requirements associated with this material or wastestream:

X. I attest and certify that all information provided is complete and accurate. This low grade fuel is properly described with no willfull omissions. Any changes or additional information obtained about this waste stream will be promptly and correctly conveyed to Norlite. If any load exceeds the Acceptance Limits or Permit Limits, resulting in rejection of a load, our company will assume responsibility for having the load removed from the site as soon as possible. Our company agrees to pay the cost for any testing, decontamination, transportation or disposal for any material shipped to the Norlite site which does not fully comply with the Acceptance Limits or Permit Limits as specified to our company by Norlite.

Generator Agent _____ Date _____

Appendix C-1

N.Y.S. D.E.C. Special Conditions

June 7, 1983

"III Testing and Sampling:

- A. Until such time that stack test results and air dispersion modeling show that contaminant level changes are appropriate, the following concentrations in the waste fuel will not be exceeded:

<u>Contaminant</u>	<u>Concentration</u>	<u>PPM by Weight</u>
Arsenic	Maximum	1.7%
Barium	Maximum	440.0
Beryllium	Maximum	15.0
Cadmium	Maximum	84.0
Chromium	Maximum	490.0
Copper	Maximum	200.0
Lead	Maximum	680.0
Mercury	Maximum	4.5
Nickel	Maximum	440.0
Selenium	Maximum	0.36
PBB, Herbicides, Pesticides	Maximum	5.0
Sulfur	Average	2.0%
Organic Halogens	Maximum	3.0 by weight
Heating Value	Minimum	75,000 BTU/GAL
Ash	Maximum	8.0%

- B. Waste fuel containing higher contaminant levels may be burned on a prorated basis at flow rates lower than 600 gallons per hour per kiln provided

suitable waste fuel flow rate indicating equipment is installed.

C. No waste fuel subject to PCB hazardous waste regulations, as described in Federal 40 C.F.R. Part 761, Section 761.10, is to be received, blended, or burned.

D. The following sampling and analysis procedure will be followed for all waste fuel shipments received:

1. Two representative samples must be taken from each shipment of waste fuel received.

2. One sample will be properly identified and stored in a glass container with a teflon lid for possible future analysis. This sample must be retained for at least 3 years.

3. The second sample will be added to a composite of samples. A completed composite will consist of samples from 40 shipments. Until the additional fuel storage tanks are in use, a composite of 20 samples will be analyzed for

PCBs and a composite of 40 shipments will be analyzed for heavy metals.

4. Each completed composite will be analyzed for the contaminants listed under III A, and reported to the Department of Environmental Conservation's Region IV Office within 30 days of the completion of the composite.

5. Each sample taken shall also be analyzed in the Norlite Plant laboratory for:

- (a) Specific Gravity
- (b) Total Organic Halogens
- (c) Heating Value

6. Within 20 days, applicant will submit the necessary Solid Waste applications for installation of the four additional fuel storage tanks. Within 90 days of issuance of the necessary Solid Waste permits (for storage tank installations), Norlite will pre-screen all waste fuel for PCBs before burning in Kiln #1 or #2. This will be accomplished by installing four additional 24,000 gallon fuel

storage tanks. When each tank is filled, a sample will be taken and analyzed for PCBs. The waste fuel in the tank will be burned only when the results of the analyses are received by Norlite. A log will be kept by Norlite personnel indicated; for each tank; shipments received, analyses results, and dates waste fuel was burned. Copies of the analyses results will be provided to the DEC Region IV Office."