New York State Department of Environmental Conservation 2176 Guilderland Avenue, Schenectady, New York 12306

(518) 382-0680



April 11, 1988

Thomas C. Jorling Commissioner

Jay Derman Executive Vice President Norlite Corporation P.O. Box 694 628 So. Saratoga Street Cohoes, New York 12047

> Re: Norlite Corp. Albany Co.

Dear Mr. Derman:

After sending my letter of March 11, 1988 granting changes to Norlite's Waste Analysis Plant, I noticed that there were several errors in the special operating conditions which have been in effect since 1983.

Attached, please find a copy of the corrected conditions. Specific changes were made in Part II, Sections B & C regarding CO cutoff levels and monitoring.

If you have any questions, please call me.

Sincerely,

michael S. Style

Michael S. Styk Sr. Sanitary Engineer Region 4

MSS/djp-2MS36

cc: Jeff Choroser Jack Lauber Sanjay Saraiya

## NORLITE SPECIAL CONDITIONS

## I. <u>On-Site Monitor</u>

A. Norlite will pay 3, 170.00 semi-annually to D.E.C. for employment of an environmental monitor.

## II. Operating Parameters and Instrumentation

- A. Audible or visual alarms will be tripped and waste fuel feed to the kiln must be stopped in the event of:
  - 1. Eurning zone temperature below 2200°F (1200°C) for a period of 5 minutes or more. Shut-off will be automatic.
  - 2. Major loss of draft in firing hood.
  - 3. A power failure. Shut-off will be automatic.
- B. The burning of waste fucl will be monitored by the burner operators assigned to each kiln and the combustion of waste fuel will be stopped in the event of any of the following:
  - 1. Exhaust gas oxygen content is less than 3.0%
  - Exhaust gas carbon monoxide content is more than 0.01% (100 ppm).
  - 3. Water flow to the Venturi Scrubber is less than 80% of design. The flow will be checked and recorded once per day.
  - 4. Water flow to the Multiuane Spray Scrubber is less than 80% of design. The flow will be checked and recorded once per day.
- C. Norlite will maintain full-time continuous monitoring for  $0_2$ , CO, waste fuel feed rate and burning zone temperature.

## 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.

CONTAMINANT		CONCENTRATION	PPM BY WEIGHT
 Arsenic Barium Beryllium Cadmium Chromium Copper Lead Mercury Nickel Selenium PBB, Herbicides,	Pesticides	Maximum Maximum Maximum Maximum Maximum Maximum Maximum Maximum Maximum Maximum	(by weight)1.7% 440.0 15.0 84.0 490.0 200.0 680.0 4.5 440.0 0.36 5.0
Sulfur Organic Halogens Heating Value Ash		Average Maximum Maximum Maximum	(by weight)2.0% 3.0 8000 BTU/1b 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 CFR 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 months.
  - 3. The second sample will be added to a composite of samples from 40 shipments. Until the additional fuel storage tanks are in use, a composite of 20 shipments will be analyzed for PCB's 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.

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

- a) Specific Gravity
- b) Total Organic Halogens
- c) Heating Value
- 6. Norlite will pre-screen all waste fuel for PCB's 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 PCB's. 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 indicating; for each tank; shipments received, analyses results, and dates waste fuel was burned. Copies of the analyses results will be provided to the D.E.C. Region IV office.

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