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New York State Department of Environmental Conservation

Division of Environmental Permits, Region 4 1150 North Westcott Road, Schenectady, New York 12306-2014 Phone: (518) 357-2069 • FAX: (518) 357-2460 Website: www.dec.state.ny.us



Mr. William Morris Vice President, Environmental Affairs Norlite Corporation 628 South Saratoga Street P.O. Box 694 Cohoes, New York, 12110

> Subject: Part 373 HW/APC Permit Modification to revise the April 20, 2004 approval to install agitators on tanks 335-300, 400 & 500 Reference: DEC #4-0103-16/16-0

August 6, 2004

373 HW/APC Permit Norlite Corporation Cohoes(C), Albany County

Dear Mr. Morris,

The Department has received & reviewed your June 30, 2004 letter requesting to revise the permit modification granted on April 20, 2004 to install agitators on tanks 335-300, 400 & 500. Norlite is proposing to reduce the nozzle projection from 24" to 12" and to install two 6" nozzles (H & I) on tanks 335-300, 400 & 500. The Department is hereby revising the permit modification granted on April 20, 2004 and re-issuing the approval letter with the following conditions:

- 1. Agitators are to be installed & operated as per the "Technical Evaluation/Selection Report for Low Grade Fuel Tanks # 335-300, 400, 500 & 600" & June 30, 2004 submission. Installation of these agitators shall be completed such that their certifications as required by condition #5 below are to be submitted to the Department on or before March 31, 2005.
- 2. The agitators shall be operated at least two hours prior to feeding Liquid Low Grade Fuel (LLGF) to the Light Weight Aggregate Kilns (LWAK) #1 & #2 from these tanks. Norlite shall maintain appropriate records (such as operation log sheets) to demonstrate compliance with this condition.
- 3. Prior to installing the agitators, Norlite shall perform an internal inspection of the above tanks to ensure that tanks are free from rust, pitting, leaking & bulging etc., and are fit for

storing LLGF and will not collapse or fail upon installing the agitators. Such inspection shall be performed by an independent NYS Professional Engineer qualified & experienced in performing these types of inspections.

- 4. Prior to installing agitators on tank 335-300, Norlite shall perform Estabrook EZY 3 Locator Plus test for tank tightness as recommended by NYSDEC SPOTS #2 memorandum.
- 5. Norlite shall notify the Department in writing that agitators are installed as per "Technical Evaluation/Selection Report for Low Grade Fuel Tanks # 335-300, 400, 500 & 600" and that inspection & testing have been performed as required by item #3 & 4 above and the tanks were found to be fit for storing LLGF and will not collapse or fail upon installing the agitators. This assessment shall be signed by an independent NYS Professional Engineer qualified & experienced in performing such tasks.

Upon submitting the notification to the Department under item #5 above, Norlite must insert the "Technical Evaluation/Selection Report for Low Grade Fuel Tanks # 335-300, 400, 500 & 600" along with revised drawing # NY003-5433 and notification at the end of the Section D of the existing 373 HW/APC Permit, DEC #4-0103-16/16-0. These documents then become part of the permit. If you have any questions, please contact Mr. Parag Amin at (518) 402-8609.

Sincerely yours,

William J. Clarke

William J. Clarke['] Regional Permit Administrator Region 4

Norlite-revmixer-permit-mod-862004.wpd CC: C. VanGuilder, R4 H. Brezner, R4 P. Counterman, CO S. Chetty, CO P. Amin, CO

Norlite Corporation

June 30, 2004

Norlite

628 SO. SARATOGA ST. P.O. BOX 694

COHOES, NY 12047 PHONE (518) 235-0401

FAX (518) 235-0233

Mr. William J. Clarke Regional Permit Administrator New York State Department of Environmental Conservation Region 4 1150 North Wescott Road Schenectady, NY 12306-2014 CERTIFIED RETURN RE

CERTIFIED MAIL#: 70031010000526496493 RETURN RECEIPT REQUESTED

Re: Part 373 HW/APC Permit Modification approval dated April 20, 2004 to install agitators on tanks 335-300, 400, 500 & 600.

Dear Mr. Clarke:

On April 20, 2004, the NYSDEC (the "Department") approved the Norlite Corporation's (Norlite) permit modification for the addition of agitators to tanks 335-300, 400, 500 and 600. In the approval letter, the Department specified a timeline (Condition #5) for the installation of agitators to each of the tanks. On May 12, 2004, Norlite notified the Department that the agitator installation was complete on tank 335-600.

Due to the additional MACT testing that was conducted in June 2004, Norlite was unable to install the agitators on the next tank and will not meet the installation deadline of June 30, 2004.

Additionally, Norlite has revised drawing number NY003-5433 to show a reduced nozzle projection for the agitators, (A&C) to 12" instead of 24", added a new 6" nozzle (H) for the level transmitters and added a new 6" nozzle (I) for the unloading area fill line/recirculation line from the kiln burners. This drawing was included in the "Technical Evaluation/Selection Report for LGF Blending Mixers" which was submitted to the Department on February 11, 2004. The changes to the drawing have been discussed with Mr. Parag Amin and he indicated submitting the revised drawing would suffice and Norlite would not be required to resubmit the complete report. The revised drawing is enclosed so the Department can insert it into the report.

Due to this change, Norlite is requesting the remaining installation deadline dates be suspended until the revised drawing has been approved, hence setting new installation dates for the remaining three tanks.

Should you have any questions regarding this letter, please contact me at (518) 235-0401.

Sincerely,

Thomas J. Sullivan Environmental Manager

Enclosure-Drawing NY003-5433

cc: Parag Amin, NYSDEC-Central Office w/ enclosure





DRAWING #6 "LCF (LOW GRADE FUEL) SYSTEM, PLAN MEW OF TANKS 335-300 & 335-400". PREPARED BY STETSON-DALE, PC FOR NORLITE CORPORATION. DATED 02/24/84.

DRAWING #7 "LGF (LOW GRADE FUEL) SYSTEM, PLAN VIEW OF TANKS 335-500 & 335-600". PREPARED BY STETSON-DALE, PC FOR NORLITE CORPORATION. DATED 02/24/84.



BOLT NO & SE CIRCLE OF BOLTS 6"-150# 11.00 9.5 (8).75 DIA LOCATION STRADDLE CL / ₱ 3'-0"X3/8"X3'-0" (NOZZLE I ONLY)

> 6"ø SCH-40 STEEL NOZZLE - EXIST. VESSEL

STL. PLATE (NOZZLE I ONLY)



SCALE: NONE