

# Norlite Corporation



628 SO. SARATOGA ST.  
P.O. BOX 694  
COHOES, NY 12047  
PHONE (518) 235-0401  
FAX (518) 235-0233

March 18, 2011

## VIA E-MAIL AND REGULAR MAIL

Mr. William Clarke  
New York State Department of Environmental Conservation  
Region 4  
1150 North Westcott Road  
Schenectady, NY 12306-2014

RE: Norlite Corp., Cohoes, NY  
Minor Permit Modification Request - CEM Analyzer Upgrade

Dear Mr. Clarke:

Norlite currently is equipped with Siemens/Ultramat Series 5E and Siemens/Oxymat Series 5E units for purposes of analyzing carbon monoxide and oxygen, respectively. Norlite installed the Series 5E units in the mid 1990s; several years later, Siemens retired the Series 5 line and replaced it with the Series 6 line. In an effort to improve monitoring performance at the facility, Norlite is replacing the existing 5E units with Siemens combination Ultramat/Oxymat 6E CO/O2 analyzers, which are in the same product line as the current units. The new analyzers are a significant improvement over the existing units and represent the current state-of-the-art. However, they operate under the same measurement principles as the existing analyzers and will not have any difficulty meeting the same performance criteria as the existing analyzers.

Recently, in conversations with Jim Lansing at NYSDEC Central Office, he has indicated that the replacement of the CEMS analyzers requires a permit modification under 6 NYCRR 373-1.7(c)(1)(iii), which specifies that applications for certain modifications of RCRA delegated permits may be processed pursuant to 6 NYCRR Part 621 as minor. We have reviewed our Part 373 Permit and the permit application on which it is based. While the function of these analyzers is vital to the operation of the kilns, no specific detail of the equipment is found in the permit or the application. Normally, when requesting a permit modification, we would provide the Department with revised pages of the application in clean form and in redline/strikeout form in order for the Department to review exactly what needs to be modified in the language of the permit. Since no language is being changed in the application or the permit, we ask you to consider our recent submittals (described below) as the detailed request for a minor permit modification pursuant to Part 373-1.7(c)(1)(iii).

On February 15, 2011, Norlite submitted its 2011 RATA Test Protocol to you and others at DEC. The cover letter specifically noted that Norlite had ordered four combination Ultramat/Oxymat 6E CO/O2 analyzers to replace the current carbon monoxide and oxygen analyzers being used at the facility and provided details regarding the implications of the new

equipment with respect to scheduling. This submission provided notice of the equipment upgrade. Norlite followed up that submission with a letter dated March 8, 2011 notifying DEC that the analyzers had been received at the facility and providing a detailed schedule for installation and testing, providing further notice of the planned equipment upgrade. Again, since there is no specific format for minor permit modification applications, we believe that the information provided in the February 15, 2011 letter and March 8, 2011 follow up provides enough information for DEC to assess the proposed analyzer upgrade in relation to Norlite's Part 373 permit.

It has been our intention to install and test these units as described in our submittals. Contractors have been scheduled accordingly and we are at risk of losing our appointments. It is our hope that the Department can approve this request as expeditiously as possible so that we can continue to move forward. Thank you in advance for your attention to this matter.

Sincerely,



Thomas Van Vranken

cc: Jim Lansing  
Don Spencer  
Lynn Winterberger