New York State Department of Environmental Conservation
Division of Environmental Permits
1130 North Westcott Road, Schenectady, NY 12306
Phone: (518) 357-2069 • **Fax:** (518) 357-2460
Website: www.dec.ny.gov

Joe Martens
Commissioner

June 5, 2013

Mr. Thomas Van Vranken
Norlite Corporation
628 South Saratoga Street
P.O. Box 694
Cohoes, NY 12047

RE: 4th Notice of Incomplete Application
6 NYCRR Part 373 Permit Renewal
Norlite Corporation
EPA ID # NYD080469935
DEC No. 4-0103-00016/00016
City of Cohoes/Town of Colonie
Albany County

Dear Mr. Van Vranken:

The Department requires additional information to complete its review and make a decision on renewing the permit. The information is requested in accordance with provisions of the Uniform Procedures regulation per 6 NYCRR 621.14(b). This gives the Department the authority to request, in writing, any information which is reasonably necessary to make any findings or determinations required by law at any time during the review of an application for permit. ***The additional information required is identified below and must be provided to the Department within 60 calendar days of the date of this letter.*** Failing to timely respond may be grounds for permit denial.

General Comments:

1. Please provide secondary containment calculation for all storage areas.

2. Please note that all deliverables should be provided in accordance with DER's electronic submission policy, and revisions to the existing permit should also be provided in redline/strikeout and clean copy Word documents.

Section Specific Comments:

Section C

Section C General Comments

1. If WAP is to be a standalone document please provide a Table of Contents.

2. Please provide a glossary with definitions of acronyms.

3. Please provide the location of the facility or a facility diagram showing location of storage tanks, drums, kilns, etc. in the WAP or reference permit drawings.

4. Please include Norlite QA Manual as an attachment since it is referred to in the WAP.

5. Please provide the chain of custody procedures established for the sampling of the waste.

6. Please provide discussion of Health and Safety Protocols, particularly for the sampling of the waste.

7. Sampling frequency shall remain the same. Please revise text to previous sampling frequencies.

8. Please provide Norlite's certifications for analyses from ELAP.

9. When describing the sampling activities instead of just narrative, provide a tabular format as shown below.

Waste Stream	Sample Parameter Selection	Minimum Sample Frequency	Rational for Parameter Selection	Method Reference	Sampling Device	Sampling Container

Section C Specific Comments

10. Sections C-1(b)(1) thru (6): Please provide the waste codes in a tabular form with the codes titled or identified.

11. Sections C-1(b)(1) thru (6): Please list the 6 criteria of 6 NYCRR 376.1(c)(3) that are referred to in these sections.

12. Section C-1(d) – Third Paragraph: Please identify referenced Method 9095A as Paint Filter Liquid Test. This reference should reference the new revision of Method – 9095B, instead of earlier revision.

13. Section C-3 (c) Storage Tanks: Please expand on the details of sampling while a tank is being re-circulated. How long does recirculation occur before a sample is drawn, and is the analysis done on a grab or composite sample? Please explain how the current method of drawing samples is as good or better than the previous approach of taking samples from the top, middle and bottom of the tank.

14. Section C-4 – Laboratory Testing and Analytical Methods -First Paragraph, Line 7: This should read ...New York State ELAP and the national NELAP Programs.

15. 10). Section C-4(a)s– Specific Gravity: Please provide the finalized revision of the SOP#4-003 that is referred to in this Section.

16. Section C-4(d) – Heat of Combustion: This Section refers to two Parr Instrument Company manuals; please provide copies of those manuals to be included in the WAP.

17. Section C-4 (f) Viscosity: The statement "Viscosity above 3000 SUS @ 80 deg F will be considered unpumpable" is missing. Please replace this language.

18. Section C-4 (i): Bottom Sediment: The statement regarding not feeding LLGF with sediment levels in excess of 8.3% has been removed. Language addressing this will be added.

19. Section C-5 (d) (ii) LLGF Kiln Feed Analysis: Please rename this section to 'LLGF & Off-Specification used Oil/Waste Fuel A Kiln Feed by Analysis', as other materials being fed to the LWAKs are addressed here.

20. Section C-5 (h) (i) Nonmetal Constituents: Should the Bevill Exclusion list of analytes be listed as Appendix C-1?

21. Section C-5 (h) (ii) Metal Constituents: As stated in the general comments, the metals analysis should be changed back to a monthly analysis basis.

22. Section C-5 (h) (ii) Metal Constituents: Please provide the organic analyses on the clinker material. The Department will evaluate the metals and organics analyses for clinker material.

23. Section C-5(h)(ii) – Metal Conductivity: Please provide a diagram or figure that identifies the baghouse, multiclone APC devices, filter cakes that are referred to in this Section.

24. Section C-6 (d) Storage Tanks Prior to Burning: This Section is missing language at its end Please replace the last sentence: 'The confirmation criteria and corrective action developed with the Department will be applied'.

25. Section C-7 Laboratory Quality Assurance/Quality Control: QA sampling is to be monthly.

26. Please see attached PDF of Section C with additional comments and edits.

Possible Typographical Errors –

27. Page C-23 – last paragraph – 'pumped instead of pimped'

28. Page C-24s– first sentence – 'waste instead of wste'

29. Page C-28 – first paragraph, fifth line – 'ten instead of tem'

30. Page C-78/79 – 'feedrate instead of federate'

Table WAP-1 Waste Analysis Plan

31. LLGF is to be analyzed monthly for pesticides and quarterly for PCDD/PCDF.

32. Frequencies for Clinker (monthly/annually) and Multiclone Dust, Baghouse Dust & Filter Cake (monthly/annually) need to be restored to previous, with 'when applicable' removed.

33. First lines– Specific Gravity: In SOP#4-012, specific gravity is referenced using Method reference ASTM-1298-99, but the Table WAP-1 Table references ASTM-1298-85. Please confirm which is the correct reference and correct.

34. Third line – Heat of Combustion: The SOP#4-001 referenced is not available for review. Please provide for review.

Section D

35. Please provide load bearing capacity calculations.

36. Please provide geographic storm intensity/frequency data.

37. Please provide details as to how containers are kept from contact with standing liquids (it is indicated that secondary containment would be inspected and drained weekly).

38. Facilities that do not have trained firefighting crews to contain the fire until the arrival of local fire department must install automatic fire suppression system – is Norlite so equipped?

39. Please provide machinery, equipment, procedures used to move containers including procedures for handling to avoid rupturing or leaking.

40. Please provide for metal tanks in contact with soil or water, a evidence of determination by a corrosion expert of factors affecting corrosion including:

- Soil moisture content
- Soil pH
- Soil sulfides level
- Soil resistivity
- Structure-to-soil potential
- Influence of nearby underground metal structures
- Existence of stray electric currents
- Existing corrosion protection measures
- Maximum ground water level and buoyancy calculations

The determination above should also address type and degree of external corrosion protection needed from the following:

- Corrosion resistant materials of construction
- Corrosion resistant coating with cathodic protection
- Electrical isolation devices
- Description of materials and equipment used to provide external corrosion protection.

Please provide supporting documentation.

41. D-1 (b) is ambiguous, how does Norlite ensure no compatibility issues with wastes received and various drums used?

42. Containers greater than 30 gallons storing flammable liquids or solids must not be stacked. Containers of flammable liquids or solids which are 30 gallons or less may be stacked 2 high to a maximum height of 5 feet.

43. Fiber Drums may only be used to store dry on-site generated waste.

44. D-2 (a): states: "The glass coating on the inside of some of the tanks impact the accuracy of the foregoing measurement device - how are inaccuracies resolved?

45. D-2 (d): Please remove the outdated reference to "Technology for Storage of Hazardous Liquids", and replace with current reference.

46. Please remove the reference to figure D-4 and renumber Figure references as appropriate.

47. Section D-1 (f): The title seems incomplete – ends with "or"?

48. In trying to match up various sections of the application to get a comprehensive sense of the facility's RCRA program, it appears some documents are attributed to (carry the logo of) Norlite and some to Tradebe (e.g., Generator's Waste Profile Sheet). Please reconcile as appropriate.

49. Section D-1 (c) Management of Containers Paragraph 2: Please remove the statement 'Drums are stacked up to 3 tiers in height'.

50. Section D-1 (c) Management of Containers Paragraph 6: Please revise 'Although most containerized was...' to 'Although most containerized waste...'.

51. Section D-5 (a) Kiln Operations and Safety Paragraph 4: Please revise the combustion gas residence time to more accurately reflects actual conditions. Include calculations.

52. Section D-5 (b): Please include information regarding the operation, location and description of the CEMS.

53. Figure D-7 Pipe Penetration Details: 'Wielded' should be 'welded'.

54. Figure D-7 Pipe Penetration Details: Please replace missing language 'All work done by experienced liner installation workers under close supervision'.

55. Figure D-9 Minimum Shell Thickness: 'Shall' should be 'shell'.

56. Figure D-13: Figure is illegible, please submit larger legible figures.

57. Specification Galvanic Anode Cathodic Protection System Engineering, Materials and Installation: A page is missing with steps 8.7.3 through 10.3. Please replace the page.

58. Missing Section: Replace Appendix D-1

59. Please see attached PDF of Section D with additional comments and edits:

Section F

60. General Comment: Please ensure that all references to Figures within Section F have been updated to correctly reference the current figure.

61. All inspection reports should have note in signatory areas should have place to have the signatory's printed name.

Security Arrangements:

62. General Comment: The submitted plan and supporting documentation does not address an artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff) that completely surrounds the active portion of the facility, including the height and material of construction. Additionally, the plan states: "Norlite *will* install a fence on the south end of the facility from the south gate to the quarry." Confirm that this barrier is in fact in place.

63. General Comment: Please confirm appropriate personnel control system is in place:

In accordance with 6 NYCRR Part 373-2.2 (f)(2)(ii)(b), entry to active portions of the facility is controlled. Employees are provided with photo identification badges for entry to the plant at the gates and turnstiles. Employees are to display their badge while within the plant. All gates and turnstiles are closed 24 hours a day.

Visitors to the plant are required to sign the Visitors' Log at the reception desk or at the main entrance. Visitors must state the nature of their visit, the employee they are visiting, and the areas of the property they will go. Each visitor is then given a temporary visitor's badge to be displayed at all times. An escort is provided for the visitor while they are at the facility. At the end of each visit, visitors are required to turn in the badge and sign out, then repeat the sign in process for each subsequent day of the visit, if applicable.

Prior to admittance to the facility, all visitors or drivers must provide information including name, business affiliation, reason for visit, person whom visiting, and date and time of entry and exit. All plant visitors, contractors, vendors, and other non-facility personnel are recorded by the guard in the visitor logbook prior to entry. Unauthorized access to the facility is prevented by the security guard. In addition, the entrance/exit gates may be closed and locked, if necessary.

64. Section F -1 Security: How does Norlite control access at the Central Avenue Entrance of the Site?

65. Section F-1 (a) Third Sentence: Please delete the word "usually".

66. Section F-1 (a) (2) First Paragraph: Please delete the sentence beginning with "Norlite will install..."

67. Section F-1 (b) Last Sentence: Please deletes", where required,".

Inspection Plan

68. Section F-2 (a): Please update Figure F-1 to incorporate the requirements of Modules III and IV.

69. Section F-2 (c): The statement "Figure F-1 lists the recommended frequency of the inspection for each item." Is unacceptable as written. The word recommended must be deleted and the frequency of inspection provided.

70. Section F-2 (d) Specific Inspection Procedures: Please replace the removed language regarding modifications to inspection forms are permit modifications.

71. Section F-2 (d): The following paragraph must be rewritten to specify current procedures which will not be modified until approved by DEC:

> "The inspection reports identified herein are subject to change but the schedule and items identified in Figure F-1 are required elements of any update. As the forms and inspection responsibilities are changed, Norlite will submit to the Department updated copies of the inspection forms along with a description of the change in responsibility. The inspection reports described herein represent the procedures implemented at Norlite at the time of this application."

72. Section F-2 (d) (2), (3) and (4): Please remove the word "typical" from "typical problems encountered and observations." The individual conducting the inspection should be reporting problems encountered.

73. Section F-2 (e)(1) Second Sentence: Please revise this sentence to specifically reference secondary containment daily inspections.

74. Section F-2 (e)(2) Last Paragraph: Please revise to include secondary containment area including LLGF.

75. Section F-2 (g): Please describe the procedure for ensuring that items noted on inspection logs requiring attention or repair are tracked and recorded.

76. Section F-2 (g): Please provide specific provisions for reporting problems encountered to individuals with the authority to resolve, along with appropriate actions expected to be taken in a timely manner. There is no indication that an individual performing the inspection will do anything other than file the report presumably at shift's end. Some examples (ACT and Environmental Work Orders) follow:

Assess, Correct, Train (ACT) Procedures

When an inspection indicates equipment malfunction or deterioration, or any other condition of concern, the following actions are taken as appropriate:

1. Assess the situation.

2. Determine the action needed in response to the situation, including immediate responses, if necessary.

3. Establish the time frame within which the responses must occur. For minor discrepancies, the area supervisor is notified and the situation remedied as soon as possible. For remedies that require more time, an Environmental Work Order (EWO) is prepared. For emergency or near-emergency situations, prompt verbal reports shall be made to the Environmental or Safety Manager, to be followed later with written reports.

4. Determine if training is required to prevent future reoccurrence and schedule any appropriate training.

5. Follow-up to verify that the situation has been resolved.

Environmental Work Order System

Environmental Work Orders are used to correct deficiencies that cannot be addressed by the end of the next business day (business days exclude weekends and holidays). The following is a description of how the EWO process works. An EWO can be initiated by any employee at the Facility using the EWO form. The form is usually completed by the Site Inspector who assigns a number to the EWO and enters it into the EWO tracking system. EWOs are typically issued by the end of the second business day after the deficiency is first noted. A copy of the EWO is then forwarded to the Operations Manager or other employee with responsibility for the resources needed to respond to the EWO. This person reviews and approves the EWO form. When the work is completed, the Site Inspector is contacted to reinspect the area. If the deficiency has been resolved, the Site Inspector finalizes the EWO. The completed EWO is filed in the Facility Operating Record.

The EWO tracking system maintained by the Site Inspector includes information regarding each current EWO, the responsible party, and the scheduled completion date. The Site Inspector periodically reviews the status of EWOs to ensure closure of each issue.

77. Section F-3 (a)(1) First Paragraph: Please provide the specific alarm signal (i.e. one short blast, two long blast, etc.) for evacuation.

78. Section F-3 (d) Second Paragraph: Please replaces '...waste that cannot be reasonable...' with '...waste that cannot be reasonably...'.

79. Section F-4 (a): Please provide justification for or delete: "During loading/unloading operations, spills are unlikely."

80. Section F-4 (a) First Paragraph: Please provide the protocol for temporary staging of deliveries, including but limited to locations of staging and maximum duration.

81. Section F-4 (c): Please provide the information referenced by this statement: "The results of those tests and a discussion of the site geology are included in Norlite's Part 360 application for the additional tank storage that was submitted to the DEC." Do not reference other submissions.

82. Section F-4 (c): Please use consistent naming convention of storage and unloading areas.

83. Section F-4 (c) First Paragraph: Please include a reference to a drawing that clearly delineates the storage and unloading areas.

84. Section F-4 (c) General: Please included a reference to a drawing that clearly indicates the containment dike referred to in this paragraph.

85. Section F-4 (c) First Paragraph: As Norlite has indicated that they will not be pursuing a Part 360 Permit; please remove reference to this permit.

86. Section F-4 (c) First Paragraph: Please provide justification for this conclusion, either state clay permeability or remove paragraph.

87. Section F-4 (c) Second Paragraph: Please provide name and cut-sheet of concrete coating and coating application schedule used on secondary contaminant structures constructed of concrete.

88. Section F-4 (c): Please provide description of storm water management in the outside uncovered storage areas.

89. Section F-4 (d) Second Sentence: Please replace "trigger" with "be activated".

90. Section F-4(e): Please replace "personnel" with "personal"

91. Section F-4(e): Please provide details outlining how the Norlite training programs meet the requirements of Part 373-2.2(h).

92. Section F-5(a): Please provide grounding details on tank drawings.

93. Section F-5(a) and F-5(c): Please include a reference that states all tools will be non-sparking.

94. Section F-5: The statement "Norlite generally does not receive or store reactive or corrosive waste." Either the "generally" must be removed or appropriate precautions must be detailed.

95. Figure F-1: Figure F-1 is difficult to read, please provide a table with spacing that allows line items to be clearly delineated and readable.

96. Figure F-1: Line item 1 under "Types of Problems" – the word "spalling" should replace "spilling".

97. Figure F-2: Please update Figure to correctly reference current Norlite Personnel.

98. Figure F-2 Delivery Procedure Item 3: Please add the following after the work "entry" "..to the facility".

99. Figure F-2 Delivery Procedure Item 4: Please replace "weigh" with "weigh-in".

100. Figure F-2 Delivery Procedure Item 6: Please use consistent naming of facility areas.

101. Figure F-2 Delivery Procedure Item 6: Does the driver take paper work to the laboratory or Norlite personnel?

102. Figure F-2 Delivery Procedure Item 9: Please indicate how the driver will be advised of the status of his load.

103. Figure F-2 Delivery Procedure Item 9 (c): Please indicate what actions will be taken if the there is a discrepancy between the drum count and the manifest drum count.

104. Figure F-2 Delivery Procedure Item 10. Please change "Paperwork" to "Scale Ticket".

105. Figure F-2 Norlite On-site Designated Truck Route Figure: Please update this drawing to accurately reflect current conditions. Please ensure that callouts are legible and easily discernible.

106. Figure F-2: Section Inspection/shift reports do not uniformly require supervisor sign off or description of actions taken to resolve issues discovered during the inspection or shift.

107. Figure F-3 Kiln Feed Operators Shift Report: Please indicate if this form will be completed for every shift.

108. Figure F-3 Kiln Feed Operators Shift Report: Please include a line for printed Supervisor's name.

109. Figure F-3 Kiln Feed Operators Shift Report: Under section noting maintenance requirements, please provide a place to indicate if a work order is required, Work Order information.

110. Figure F-3 Kiln Feed Operators Shift Report: Please add lines for visible emissions inspections after WFCO, identify type and time of WFCO, who observed and what was observed.

111. Figure F-4 Fuel Farm Operator's Pre-Shift & Daily Inspection Report: Please include a line for printed Supervisor's name.

112. Figure F-4 Fuel Farm Operator's Pre-Shift & Daily Inspection Report: Under section noting maintenance requirements, please provide a place to indicate if a work order is required, Work Order information.

113. Figure F-4 Fuel Farm Operator's Pre-Shift & Daily Inspection Report: Please combine the "OK" columns into one "Yes/NO" column and increase the action needed column.

114. Figure F-4 Fuel Farm Operator's Pre-Shift & Daily Inspection Report: What is the function of the "status" column?

115. Figure F-4 Fuel Farm Operator's Pre-Shift & Daily Inspection Report: Please indicate what fences and gates will be inspected.

116. Figure F-4 Daily Inspection Form: Why have the rows for 'Spill Controls' and 'LGF Data System' been removed?

117. Figure F-4 Daily Inspection Form: Why has the 'Areas of Erosion or HW Release' row been eliminated? Please replace the above rows to the inspection sheets.

118. Figure F-5 Kiln Thermal Input Log: Please add the unit 'Gallons' to the Total column.

119. Figure F-5 Kiln Thermal Input Log: Please include a line for printed Supervisor's name.

120. Figure F-6 Burner Operations Log: Please include a line for printed Supervisor's name.

121. Figure F- 7 Weekly Environmental (RCRA) Inspection Report: Please include a line for printed Supervisor's name.

122. Figure F-7 Weekly Environmental (RCRA) Inspection Report: Please revise method of marking issues found. Yes meaning acceptable and No meaning not acceptable. Please include these instructions on form.

123. Figure F-9 Drum Handling Protocol: Please revise this procedure to adequately define inspection procedures such as "Proper Drum", use consistent location naming,

remove un-safe drum handling procedures such as using a front-end loader to move drums, and correct typographical errors.

124. Attachment F-2 Subpart BB Applicability: Norlite has not addressed the applicability of 373-2.27(d) for closed-vent system. Please confirm that Norlite does not have any equipment in vacuum service as defined by the regulation (ie. continuously operating at 5kPa or more below ambient pressure).

125. Attachment F-2 Subpart BB Waste determinations: No discussion is included on waste determination. Knowledge based or direct measurement?

126. Attachment F-2 Subpart BB Pumps: Pumps 3,4 5, and 6 are not listed. Out of service pumps will be noted on the daily and weekly inspection reports as appropriate but how will the "Leak Detection Sheets" be maintained and by who? See comment 23 below.

127. Attachment F-2 Subpart BB: Monthly check of barrier fluid belongs under the pump section, not under compressors.

128. Attachment F-2 Subpart BB: If the closed vent system is exempt, why has Norlite chosen to list and monitor the items? See also Comment 15 above and 25 below.

129. Attachment F-2 Subpart BB Sampling Connections: Does Norlite have any other type of sampling systems such as closed-purge, closed-loop or closed-vent systems?

130. Attachment F-2 Subpart BB: Has Norlite identified any double block and bleed systems or double valve?

131. Attachment F-2 Subpart BB: Norlite has not identified specific valves that are unsafe to monitor. When Norlite monitors using the Photovac 202 Pro Plus (or equivalent) will Norlite use the 10,000 PPM criteria in the regulation or the 500 PPM criteria in the footnote to designate the need for a repair?

132. Attachment F-2 Subpart BB: Where will the Leak detection sheets be filed? Will actions be recorded on the daily or weekly inspection reports once an item is tagged? Are the tags and the leak detection sheet the same thing? An example was not provided.

133. Attachment F-2 Subpart BB: Under 373-2.28(i) Norlite is not required to monitor pressure relief devices, flanges and other connectors until a leak is detected by visual, auditory or olfactory or other method. For clarity, specify the method(s) Norlite is employing during the fuel farm pre-shift and weekly inspections and when an instrument is used to monitor a suspected leak. When the Photovac 2020 is used, will Norlite use the 10,000 PPM criteria in the regulation or the 500 PPM criteria in the footnote to designate the need for a repair? Where will the actions be recorded (eg. the daily or weekly inspection reports or just on the tags)?

134. Attachment F-2 Subpart BB: Closed vent systems and controlss- has Norlite documented the initial NDE monitoring inspection? How does Norlite monitor the flow of the vent system? How does Norlite comply with 373-2.27(d)(3), (d)(6)(i), and (d)(13)?

135. Attachment F-2 Subpart BB: Is Norlite going to use the alternative standards for percentage of valves allowed to leak [373-2.28(l)] and the alternative skip period [373-2.28(m)]?

136. Attachment F-2 Subpart BB: Minor typo – reference on last page of Table for 6NYCRR 373-2.28(p) should be 2.28(o).

137. Attachment F-2 Subpart CC Paragraph 1: Please include: welded manways and connections and any through tank penetrations in the inspection program.

138. Attachment F-2 Subpart CC Paragraph 2: The Quarterly Subpart BB inspections submissions to the Department must clearly indicate any noted defects, cracks, holes, gaps, damaged gaskets, or other defects.

139. Attachment F-2 Subpart CC Equipment to be Inspected: Please indicate equipment (including tanks) that will be inspected, do not reference a previous permit module.

140. Attachment F-2 Subpart CC Inspection Results: All deficiencies noted in an inspection must indicate if a work order is necessary to remedy and then provide the work order tracking number.

141. Attachment F-2 Subpart CC Requirements for Defect Repairs: Please add the following statement, Norlite will provide the Department with a schedule for tank repairs in accordance with the Permit requirements.

142. Attachment F-2 Subpart CC Requirements of 40 CFR 265.1084(d): This section should reference Part 373-2.29(d)(2)(iv), Part 373-2.29(e)(4)(i), and Part 373-2.29(e)(4)(ix).

143. Attachment F-2 Subpart CC Requirements of 40 CFR 265.1084(d): How does Norlite use the 500ppm limit to determine a leak? Please provide details.

144. Attachment F-2 Subpart CC Inspection Form : The following statement is unacceptable as written – "See the attached form for an example of the form which will be used to conduct and document the annual inspection." Provide actual forms to be used for inspections.

Section G

145. Section III (G-4-G-9); Attachment 1 (G-21); G-69: Thes* and ** labels in Attachment 1 (which indicate eligible Incident Commanders and priority contacts) are not used.

146. Section II (G-3, G-4); Section III (G-9): No statement indicating that a contingency plan document has been distributed to emergency facilities. Only mentions Section B and Section C of permit as being provided.

147. Section V (G-12); Attachment 2: Areal extent and spill source information should be included as part of release data gathered.

148. Section VII (G-16) ; Attachment 4: Section VII references Attachment 3 but should be referencing Attachment 4.

149. Section VIII (G-17-G-18): No "site plan" is mentioned or included in Section G. Could not find a site diagram or emergency/evacuation layout anywhere in the renewal application.

150. Section X (G-19 – G-20) ; Attachment 5 (G-60): Section X references Attachment 6 but should be referencing Attachment 5.

151. Attachment 1 page 1: Please update the contacts, and indicate who have been trained as Incident Commanders and who must be contacted after the Contingency Plan is implemented.

152. Attachment 2 Fire or Explosion Step 6: Please replace the missing parts of **Step 6** included in 2007 permit.

153. Attachment 5: Please provide a signed Work Agreement Contract.

154. Attachment 5: Please provide an updated Time & Material Rates for the contractor.

155. Please see attached PDF of Section G with additional comments and edits.

Section H

156. Please include a brief description of how training will be designed to meet actual job tasks in accordance with requirements in 373-2.2(h)(1)(iii).

157. Please address Fuel Farm Operator or Compliance Personnel, which are mentioned in the section on procedures to prevent hazards.

158. Please demonstrate that the program is directed by a person trained in hazardous waste management. Provide the credentials of training director.

159. Please provide a description of how instructions of facility personnel in hazardous waste management procedures (including contingency plan implementation) is relevant to their positions - identify the type of training to be given to each affected position and how the training will enable the employee in that position to adequately conduct hazardous waste procedures relevant to the position.

160. Please provide documentation that the training program trains facility personnel to respond effectively to emergencies and trains them to be familiar with emergency procedures, emergency equipment, and emergency systems, include where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Key parameters for automatic waste feed cutoff systems
- Communications or alarm systems
- Response to fires or explosions
- Response to groundwater contamination incidents
- Shutdown of operations

161. Norlite will need to document that training has been successfully completed by facility personnel.

162. Please provide an outline of both the introductory and continuing training programs by owners or operators to prepare the personnel to operate and maintain the facility in a safe manner. Exhibit A (attached) is provided as an example of such an outline, however it is the applicant's responsibility to provide a facility specific outline.

163. Please see attached PDF of Section H with additional comments and edits.

Section K: Certification

164. Confirm William Morris works for Norlite/Tradebe.

Section M: Drawings

165. Please provide secondary containment calculation for all storage areas.

166. A New York State PE stamp must be affixed to all drawings of all regulated areas requiring secondary containment, including the calculations to determine the secondary containment volume capacity.

167. A New York State PE stamp must be affixed to the air handling and treatment process design drawings. Engineering Drawings and Process Flow diagrams for the air handling/treatment process should be provided.

168. Norlite needs to provide some designation on the dwgs of the items which are exempt, difficult to monitor, or unsafe to monitor.

169. Exempt, difficult to monitor and unsafe to monitor items have not been identified in a list and need to be.

170. Subpart BB Dwg. for outside pumps – legend is missing items.

171. Based on the Dwgs., how many total points are now covered by Subpart BB? This number has been debated for some time.

172. Dwg. for tunnel connection – what do the identifiers indicate, welds, flanges?

173. Burner Flr. Kiln 1 Dwg. – is the compressed air pressure always on? Would the connectors on the burner side of the valve associated with the compressed air inlet come in contact with hazardous emissions? Same goes for Kiln 2.

174. Dwg. for Fuel unloading Bays indicated Kiln "Oil". Explain what this is and how it relates to Subpart BB. Is the equipment in contact with Kiln Oil also used for LLGF?

175. EQ Rm Mid Level Dwg. – there is no legend, are items 30266, 30285, 30272 and 30280 a type of valve?

176. EQ Rm. Tank 102B Dwg. – the legend for "treaded Union" does not appear to be correct. It should be a bolder line. What are items 30353 and 30352? What is a flex House (flex hose?).

177. EQ Rm. Tank 102A Dwg. – Could the first connector at the top of the tank associated with the N2 line be in contact with haz emissions and be monitored. Or perhaps it should be inspected under Subpart CC.Outside tank Dwg. – Legend is missing a few items. "LI" is level indicator, and "P" is pressure?

178. Inside Tanks – What is purple pipe?

179. Do any of the drawings overlap? It doesn't appear the ID numbers for items in the tunnel on the inside tank drawings coincide with any of the item number on the tunnel drawing.

180. Drum Processing Rm and Fuel Farm dwg. – only the line to Tank 200A is indicated. What are the other 4 lines associated with? Shouldn't some of the items be the same on both this dwg. And the one for the LLGF tanks where lines cross the wall?

181. Vent Dwg. for inside tanks - Where is the vent drum located? What is the grey pipe and why isn't the connector on the fuel side monitored?

182. Please see attached PDF of Section M with additional comments and edits.

Financial Assurance:

183. Financial Assurance General Comment – Please provide a detailed Financial Assurance Cost Estimate in accordance with the Closure, Post-Closure and Corrective Action Cost Estimates and Financial Assurance Guidance provided under separate cover.

Standard Operating Procedures:

184. SOP 04-013.10 – Determination of Heat of Combustion of Low Grade Fuel
- this SOP is being replaced by SOP #04-064.1
- the new SOP has been reviewed by NYSDEC with changes accepted
- the new SOP's effective date is January 14, 2013

185. 04-014.10 – Determination of Total Halogens in LGF by Titration
- revision #11 was reviewed by NYSDEC with changes accepted
- a finalized Revision #11 with an Effective date of January 14, 2013 is on file with NYSDEC
- 04-014.10 should be updated to 04-014.11 for the permit

186. 04-016.10 – Determination of Metals Content in Solid and Liquid Waste by ICP
- revision #11 was submitted by Norlite for NYSDEC's comments
- NYSDEC comments were sent to Norlite on 03-21-2013
- revision #10 had been reviewed by NYSDEC with changes accepted
- Effective date of Revision #10 August 2, 2011

187. 04-017.9 – Extraction and Clean-up of Liquid Waste to Determine Levels of Polychlorinated Biphenyls
- revision #10 was submitted by Norlite for NYSDEC's comments
- NYSDEC comments were sent to Norlite on 02-22-2013
- Norlite's response to NYSDEC's comments were received and accepted by NYSDEC on 03-21-2013
- no further changes expected for revision #10
- Effective date of Revision #9 January 25, 2012

188. 04.043.4 – Determination of Ash Content in Fuel Samples
- revision #5 was submitted by Norlite for NYSDEC's comments
- NYSDEC comments were sent to Norlite on 03-21-2013
- revision #4 had been reviewed by NYSDEC with changes accepted

- Effective date of Revision #4 January 25, 2012

189. 04-047.5 – MARS Microwave Digestion (3050B) for ICP Analysis
- not able to verify that NYSDEC reviewed revision #5
- revision #4 was reviewed by NYSDEC with changes accepted
- revision #4 has an effective date of March 10, 2011
- Effective date for Revision #5 March 12, 2012

190. 04-055.2 – Mercury Analysis of Low Grade Fuel, Oil, Solid, and Sludge by Cold Vapor Atomic Absorption
- revision #3 was submitted by Norlite for NYSDEC's comments
- NYSDEC comments were sent to Norlite on 02-15-2013
- revision #2 had been reviewed by NYSDEC with changes accepted
- Effective date of Revision #2 January 25, 2012

191. SOP #04-017.10 - PCB Extraction for LGF Samples
- has now gone through all reviews and has an effective date of April 1, 2013

192. SOP #04-055.3 - Mercury Analysis in LGF:
- has also gone through all reviews and has an effective date of April 1, 2013

Should you have any questions, comments or concerns regarding these comments, please contact Ms. Heide-Marie Dudek at hmdudek@gw.dec.state.ny.us or 518-402-9814.

Sincerely,

Nancy Baker
Deputy Regional Permit Administrator

Attachments
ec: M. Cruden – NYSDEC
G. Burke – NYSDEC
T. Killeen – NYSDEC
J. Quinn – NYSDEC
J. Lansing – NYSDEC
D. Maikels –NYSDEC
D. Lates – NYSDEC
H. Dudek – NYSDEC
H. Brezner – NYSDEC
A. Elliot – NYSDEC
J. Hadersbeck – NYSDEC
T. LaGrimas - Tradebe