

NORLITE, LLC

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January 16, 2014

Ms. Heidi-Marie Dudek, P.E.
Project Manager
Remedial Bureau E, Section A
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233-7017

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Proposal to Add Waste Codes K169 & K170 to Part 373 Permit
EPA ID#NYD080469935

Dear Ms. Dudek:

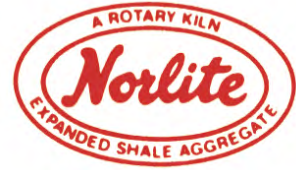
As requested by the Department in earlier communications, Norlite is submitting this letter as a proposal to add waste codes K169 and K170 to the list of accepted waste codes in the current and future Part 373 permits. Below Norlite has addressed key concerns which have been expressed by the Department during recent meetings and electronic communications.

Norlite is requesting the addition of waste codes K169 and K170 to diversify the types of wastes which Norlite currently accepts. The wastes associated with K169 and K170 typically have a high BTU content which is important to the lightweight aggregate manufacturing process. The higher BTU containing wastes are needed to help compensate for a market trend which is showing lower BTU containing wastes becoming the norm. Currently higher BTU solvent containing wastes are being diverted or will be in the future to a more environmentally friendly process such as recycling. Norlite will still have a need for high BTU containing wastes to blend with the low BTU containing wastes to provide a suitable fuel for the kilns. Past experience has shown that materials similar to these wastes have provided exceptional fuel for the kilns.

While the K169 and K170 waste do contain higher levels of solids, as high as 12% to 15%, these wastes will be accepted and blended down to meet the current and future Part 373 permit burn limits. Norlite currently blends burn tanks to meet the current permit limit of 8.3% and will continue to do so even after these wastes are accepted into the facility. At the current permit limit of 8.3%, Norlite is anticipating to receive approximately two - three loads of these wastes per week. This waste is not reactive and is typically composed of hydrocarbons from refining of crude oil, with the solids containing Silica, Alumina and some metals. As such, we believe it does not increase process or storage risk.

Norlite does not believe or expect any additional truck traffic to occur because of the acceptance of the K169 and K170 waste streams. Norlite's storage capacity and burning capacity are remaining relatively unchanged and for that reason there should not be any significant changes in truck traffic either way.

Norlite strongly believe the addition of wastes K169 and K170 will not have any significant impacts to the operation of the kilns or fuel farm activities. Similar waste have been handles at the facility and shown to be very suitable materials as fuel for the kilns.



NORLITE, LLC

Norlite appreciates the Department's time and consideration while evaluating this proposal request. Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tom.vanvranken@tradebe.com. Thank you.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

ecc: Tita LaGrimas – Tradebe
Nancy Baker, NYSDEC