



NORLITE, LLC

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October 28, 2014

Ms. Nancy Baker
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

Certified Mail: via email
Return Receipt Requested

Re: Norlite Permit Modification Request to Part 373 Permit

Dear Ms. Baker:

Norlite, LLC would like to formally request a permit modification of the current Part 373 Hazardous Waste Permit to address the replacement of the multiclone units on both Kiln 1 and Kiln 2. The current multiclone units have reached the end of their useful lives and need replacement. The manufacturer of the current units is no longer in business so Norlite has enlisted the service of Processbarron out of Pelham, Alabama to manufacture new multiclone units.

The multiclone units remove larger dust particles from the exhaust stream before the exhaust enters the Heat Exchanger and then the Baghouse System. A multiclone operates by using spin vanes which create a vortex that pulls the larger dust particles from the exhaust stream. The current multiclone units have spin vanes which have lost their efficacy due to material buildup. The limited access offered by the design of the current multiclone units has made cleaning the spin vanes difficult. Norlite is working with the manufacturer to design new units which have additional room to allow easier cleaning which should extend the life of the unit as well as the efficacy. The new multiclone units will still operate under the same principles as the current units by using spin vanes and a vortex. The new units will also have the same overall footprint of the current units.

Norlite has been experiencing premature baghouse bag failure for approximately one year. Norlite worked with the baghouse bag manufacture as well as third party engineers to investigate the cause of the premature bag failure. Ultimately, the conclusion was that the multiclone spin vanes were becoming blanked off with buildup which was allowing larger particle sized material to travel to the baghouse system and cause physical damage to the bags. Since these findings, Norlite has undergone an aggressive cleaning cycle of the multiclone units to help maintain the current level of usefulness with an ultimate eye on replacement. Norlite is tentatively looking to install a new multiclone unit on Kiln 2 during the week of December 8, 2014 with a completion date of December 12, 2014. The Kiln 1 multiclone replacement is currently scheduled for some time in mid to late 2015 or after a sufficient trial period has been completed with the Kiln 2 unit to ensure protection of the baghouse bags is occurring.

Once the new units are in place, Norlite will continue with the aggressive cleaning cycle which has been developed over the past several years. There is no training needed with the multiclone units since there is no moving parts and optimal operation of the unit is set by the average flow rate experienced by the air pollution control system. To assist in the review of this modification request, Norlite has provided marked up and clean copies of Section D from the current Part 373 permit. To further assist the Department with this review, Norlite has attached additional technical information about the new multiclone unit as well as a draft engineering drawing of the new unit.



NORLITE, LLC

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tom.vanvranken@tradebe.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

ecc: Thomas Killeen, NYSDEC – CO
Tita LaGrimas – Tradebe
Tim Lachell - Norlite