

Norlite, LLC



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September 25, 2015

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: 7015 1660 0001 1335 9204
Return Receipt Requested

Re: Norlite Permit Modification Request to Part 373 Permit – Optical Flow Sensor Kiln-2

Dear Ms. Baker:

Norlite, LLC is submitting this formal request a permit modification of the current Part 373 Hazardous Waste Permit and Title V Air permit to address new technology for monitoring stack gas flow measurements for Kiln 2. This modification request would replace the current Fluid Components International (FCI) Model GF90 unit with new optical flow scintillation (OFS) technology for stack gas flow measurement at Kiln 2. Norlite has been working with the Department installing and approving the same technology on Kiln 1. The final data was submitted on August 28th, 2015 for Kiln 1 and only the change in referenced diagrams in the permit is left to be completed before final approval.

As previously submitted, the OFS data shown in Kiln 1 operations demonstrates a more stable stack gas flow measurement with an approximate 80% reduction in the number of potential AWFCOs. Therefore, Norlite has installed the same technology on Kiln 2 to test and monitor performance.

As requested by the NYS DEC later dated April 16th, 2014, please find enclosed (and attached) the required 30 day comparison evaluation of the FCI and OFS data, including the raw data, and the respective HRA data. Furthermore, we are presenting the department with the most recent RATAs of both instruments on Kiln 2. All information demonstrates that this change in technology will be beneficial in significantly reducing the number of stack gas flow rate AWFCOs on Kiln 2.

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

Sincerely,

Prince M. Knight III
Laboratory, Environmental & Compliance Manager

ecc: Joseph Hadersbeck, NYS DEC
Thomas Killeen, NYS DEC
David Lates, NYS DEC
Tita LaGrimas, Tradebe
Tim Lachell, Norlite
Darrell Monk, Norlite