

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 4

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July 11, 2016

Prince Knight, Environmental & Compliance Manager
Norlite, LLC
628 S. Saratoga Street
Cohoes, NY 12047

RE: RCRA 6 NYCRR Part 373 Hazardous Waste Permit
Permit ID: 4-0103-00016/00016
(RCRA ID: NYD080469935)

Dear Mr. Knight,

The New York State Department of Environmental Conservation (Department) has identified some adjustments which need to be made in the RCRA 6 NYCRR Part 373 Hazardous Waste Permit (renewed on January 1, 2016) related to Corrective Action and Site Management obligations. The Department is hereby providing Norlite with this notice of intent to modify Norlite's Part 373 Permit pursuant to 6 NYCRR 373-1.7(c)(1)(i), 6 NYCRR 373-1.7(c)(1)(ii), and 6 NYCRR 373-1.7(c)(15)(i). Below is a list of the changes being made:

1. In Schedule 1 of Module I Section A, under Documents Incorporated by Reference Item 13, the Norlite April 2014 draft Statement of Basis is referenced. Item 13 should instead reference the final version of this document published February 2015. Item 13 is being modified accordingly.
2. As a result of the incorporation of the SB by reference into the Permit (see change #1), Norlite is required to update their financial assurance instruments to include the additional \$100,901 cost associated with the selected final corrective measures. This amount is in 2016 dollars, as the 2013 cost estimate of \$97,000 for the "No Further Action with Site Management" corrective measure has been adjusted for inflation using the inflation price deflator for Gross Domestic Product as published by the U.S. Department of Commerce, Bureau of Economic Analysis, in accordance with 373-2.8(c)(2). This requirement has been added to the compliance schedule as Compliance Item #6 in Schedule 1 Module I Section B and is due 60 days from the date of this letter.
3. In Schedule 1 of Module I Exhibit B, the table under A.1.a is being modified to include details of the Status for SWMUs 1 and 12(b) which are following site management requirements per the 2015 Final Statement of Basis (SB). Footnotes 1 and 2 for this table are also being modified to reference the SB.
4. In Attachment E Section 1.0, the Facility Permit Information in the table under 1.1 is being modified as needed for accuracy and completeness.
5. In Attachment E Section 3.0, the action items table is being revised to include the requirement for Norlite to develop a Site Management Plan (SMP) and develop/file an Environmental Easement under the SB.



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6. In Attachment E Section 4.0, it indicates that the facility has an NYSDEC-approved Post-Closure Plan and Site Management Plan. This information is incorrect and is being modified accordingly.

In an enclosure to this letter, the Department has included the specific pages that are being added or replaced in the Permit. The added and modified Permit pages include all pages of Attachment E and Schedule 1 of Module I pages S1-4, S1-9 through S1-14, B-1, B-2, and B-3. Please add/replace these pages in your copy of the permit. As a requirement of this modification, please also record these changes in Attachment D permit modification log as required by Module I Condition D.2.a and D.3, and submit a copy to the Department within 15 days of this letter.

This letter and the enclosed pages are to be considered an official amendment to Norlite's Part 373 Permit and, as such, are to be incorporated therein. This official amendment will become effective on July 26, 2016, unless Norlite submits a written statement within 15 days of this letter's receipt in accordance with 6 NYCRR Part 621.13(d) of the regulations.

Under 6 NYCRR Part 373-1.7(e), Norlite is required to notify all persons on the facility mailing list of this modification. Please provide this office with a copy of your notification for our records. If you have any questions, please contact David Lates at (518) 402-9814 or me at (518) 357-2452.

Sincerely,



Nancy M. Baker
Deputy Regional Permit Administrator

Ec: D. Lates, NYSDEC
T. Killeen, NYSDEC
J. Hadersbeck, NYSDEC
A. Chieco, NYSDEC

J. Quinn, NYSDEC
E. Stager, Tradebe
D. Monk, Norlite



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4. Norlite Waste Analysis Plan (June 2014)
5. Norlite Security and Inspection Plan (June 2014)
6. Order on Consent, DEC Case No. R4-2009-0610-101, between New York State and Norlite Corporation. (May 11, 2010)¹
7. Norlite Corporation, Cohoes, New York, NYSDEC Part 373 Hazardous Waste Permit Application, (January 2012, Revised June 2014).
8. Human Health & Ecological Risk Assessment Reports. April 2002.
9. ATSDR Public Health Assessment for Norlite Corporation, December 2, 2005
10. Environmental Assessment Form (EAF) (November 1993, Revised June 2014)).
11. Facility Noise Survey (April 20, 2009)
12. Norlite Best Management Practices Plan Revision 1(April 30, 1992, Revised October, 2014)
13. Norlite Corporation Final Statement of Basis (February 2015)

Footnotes:

1. Each document referenced by this footnote includes the above dated original submission and any subsequent Department approved document revisions.

Item No.	Title	Description	Compliance Date
5	Tank Blending - Audit Tank Blending Verification	<p>Conduct an audit of the tank blending calculations and feeds with respect to actual blended tank sampling vs. compliance with permit limits related to the light weight aggregate kilns. Submit Audit Report to the NYSDEC for review and approval, providing recommendations for improvements.</p> <p>Submit a Proposal to implement improvements, including implementation schedule, to NYSDEC for review and approval.</p> <p>Implement Proposal in accordance with approved schedule.</p>	<p>Within 6 months of the effective date of this Permit</p> <p>Submit Proposal within 45 days of Department approval of Audit Report</p> <p>Implement within 120 days of NYSDEC approval of Proposal, unless an extension is granted by the Department</p>
6	Updated Financial Assurance	<p>Update Norlite's financial assurance instruments to include the additional \$100,901 cost associated with the selected final corrective measures in the Final Statement of Basis. This amount is in 2016 dollars as the 2013 cost estimate of \$97,000 has been adjusted for inflation using the Inflation Price Deflator for Gross Domestic Product as published by the U.S. Department of Commerce, Bureau of Economic Analysis.</p> <p>Submit updated financial assurance documents to NYSDEC for approval and filing.</p>	<p>Within 60 days of the effective date of this Compliance Item's incorporation into this Permit.</p>

C. SCHEDULE OF DELIVERABLES

The Permittee must complete the following compliance activities within the time frames indicated on the following table:

Item #	Title	Description	Compliance Date
1.	Site Management Plan (SMP)	<p>Prepare a SMP for the Norlite facility and submit to the NYSDEC for review and approval in accordance with the following schedule:</p> <ul style="list-style-type: none">• Draft SMP• Final SMP	<p>Within 120 days of issuance of permit</p> <p>Within 60 days of receipt of NYSDEC comments on the Draft SMP</p>

D. REQUIREMENTS FOR AN ON-SITE ENVIRONMENTAL MONITOR

Number of Environmental Monitors assigned to Facility: One (1)

- The Permittee shall fund environmental monitoring services to be performed by or on behalf of the Department. These monitoring services will include, but not be limited to, the scope of work in an annual environmental monitoring work plan which is incorporated by reference and enforceable under this permit.
- The Permittee shall provide to the Department on an annual basis the funds necessary to support the activities set forth in the annual environmental monitoring work plan. The sum to be provided will be based on the annual budgeted amount and is subject to annual revision. Subsequent annual payments shall be made for the duration of this Permit or until the environmental monitoring services are no longer necessary, whichever comes first.
- The Permittee shall be billed annually, prior to the start of each State Fiscal Year (SFY) (April 1). If this Permit is to first become effective subsequent to April 1, the initial bill will be for an amount sufficient to meet the anticipated cost of the environmental monitoring services through the end of the current SFY.
- The Department may revise the required annual bill on an annual basis to include all of the Department's estimated costs associated with the environmental monitoring services. The annual revision may take into account such factors as

inflation, salary increases, changes in the fringe benefits rate, changes in operating hours and procedures, changes in non-personal service costs (including travel, training, sampling and analytical, and equipment costs, etc.), an increase or decrease in the level of environmental monitoring services necessary, and an increase or decrease in the number of environmental monitors. Upon written request by the Permittee, the Department shall provide the Permittee with a written explanation of the basis for any revisions.

- e. Prior to making its annual payment, the Permittee will receive, and have an opportunity to review, an annual environmental monitoring work plan that the Department will undertake during the year.
- f. Payments are to be made in advance of the period in which they will be expended and shall be made in full within 30 days of receiving a bill from the Department. The bill from the Department to the Permittee will provide information regarding to whom payments should be made payable and the address to which payments should be sent.
- g. Failure to make the required payments shall be a violation of this Permit. The Department reserves all rights to take appropriate action to enforce the above payment provisions.
- h. The environmental monitor shall, when present at any of the Permittee facilities, abide by all of the Permittee health and safety and operational requirements and policies, if such requirements and policies exist and provided they are not inconsistent with Department policies and labor management contracts, and further provided, however, that this shall not be construed as limiting the environmental monitor's powers as otherwise provided for by law and shall not result in the environmental monitor being afforded less protection than otherwise provided to the environmental monitor by State and Federal health and safety requirements.
- i. The environmental monitor shall receive from the Permittee all general and site-specific safety training which is normally given to new facility/site employees for all areas of the facility or site. Upon selection of the environmental monitor, the Permittee shall immediately furnish to the environmental monitor any facility/site health and safety and operational requirements and policies. Within five (5) days of any revision to the facility/site health and safety and operational requirements and policies, the Permittee shall furnish to the environmental monitor the health and safety and operational requirements and policies.
- j. The environmental monitor shall be permitted to use environmental monitoring and data collection devices (e.g., photo ionization detectors, cameras, video recording devices, computers, cell phones, etc.) deemed necessary by the Department to evaluate and document observed conditions. Copies of the data or images collected from areas where confidentiality is a concern shall be provided

to the Permittee upon their request. The Permittee may request the data and images be considered confidential information if appropriate.

- k. It will remain the responsibility of the Permittee to contact the Spill Hotline or any Division within the Department regarding any required notification of any spill, release, exceedances etc. Notification to the environmental monitor will not be considered sufficient to replace any required notifications.
- l. Monitor's trailer is to be kept in good operating condition, including watertightness, exterior night lighting, proper anchoring/foundation, appropriate heating and cooling, and prompt snow removal to include access paths to Facility's offices.

E. REQUIREMENTS FOR ENVIRONMENTAL SAMPLING

- a. The costs set forth in D.1.a above shall include laboratory sampling and analytical costs and fees. These costs and fees will be fixed at an annual maximum cost of \$40,540 per year, for 3 years. Payment of these fees shall be included in the annual bill issued pursuant to D.1.a above. After the initial 3-year period, the amount of sampling and analytical costs and fees to be paid per year, for each subsequent three-year period thereafter, shall be set forth in a separate Memorandum of Understanding ("MOU"). If Norlite and the Department cannot agree on the amount for this MOU by the date that Norlite must pay the next annual payment, the cost for that year will be equal to the amount paid in the previous year plus an inflation adjustment and the dispute shall be resolved pursuant to a permit modification hearing. This adjustment shall be calculated by multiplying the amount paid during the previous year and quotient obtained by dividing of the most recent Implicit Price Deflator for Gross National Product established by the U.S. Department of Commerce in its Survey of Current Business by the deflator for the previous year.
- b. These funds required under subparagraph (a) shall not be used to pay for any off-site sampling costs or for analyzing sampling taken off-site.

F. ROUTINE REPORTING

The Permittee must submit the following routine reports to the Department by the indicated due date in accordance with the requirements of this Permit (Note: the list presented below does not include non-routine reporting to the Department.):

Report	Frequency	Due Date	Requirement
Local Fire Company Inspection	Semiannually	Within 7 days of inspection	Condition A.1 of Exhibit A
Copies of Hazardous Waste Manifests to NYSDEC	Ongoing	Within 10 days of signature	6 NYCRR 372.2(b)(3)(iii)
Annual Report	Annually	March 1 st	6 NYCRR 373-2.5(e)
Hazardous Waste Export Report	Annually	March 1 st	6 NYCRR 372.5(f)
Hazardous Waste Reduction Report - Annual Status Reports and Biennial Updates	Annually	July 1 st	ECL 27-0908 and Module I, Condition L
Summary of Green Remediation Metrics ¹	Annually	March 31 st	Exhibit B – Condition C
Containers Secondary Containment Assessment Report	Annually	Complete assessments by August 31 st ; submit report by November 30 th	Module III, Condition K.1; Condition B.2 of Exhibit C
Tank System Assessment Report	Every 2 years	Within 60 days of inspection	Exhibit D, Condition C.3
Tank Secondary Containment Assessment Report	Annually	Complete assessments by August 31 st ; submit report by December 31 st	Module IV, Condition K.4

Report	Frequency	Due Date	Requirement
Closure Cost Estimate Adjusted For Inflation	Annually	60 days prior to anniversary date of establishment of financial instrument	6 NYCRR 373-2.8(c)(2) and Module I, Condition O
Financial Assurance	Annually	April 1 st	6 NYCRR 373-2.8
Evidence that Financial Assurance Instruments have been Maintained and not Lapsed	Annual	30 days prior to anniversary of initial approval	Module I, Condition O.11
Complaint Log	Monthly	Submit by 21 st of each month. (Submit with RCRA Compliance and Operations report)	Exhibit A – Condition C.4
Noise Control Measures Plan or Notice of No Change	Annual	March 31 st	Exhibit A – Condition C.5
Best Management Plan or Notice of No Change	Annual	March 31 st	Exhibit A – Condition C.5
RCRA Inspection Report	Available upon request	To be completed close of business the following Wednesday	Security and Inspection Plan
RCRA Fuel Farm Inspection Report	Available upon request	By noon the following regular business day	Security and Inspection Plan

1- Summary must be recorded on most recent form provided by the Department.

EXHIBIT B
SUPPLEMENT TO
MODULE II - CORRECTIVE ACTION

The following conditions supplement those conditions contained within Module II of this Permit:

A. Applicability

1. The conditions of this Exhibit and Module II apply to:
 - a. the Solid Waste Management Units (SWMUs) and Areas of Concerns (AOCs) listed below; and

<i>Number</i>	<i>SWMU(s) or AOC(s)</i>	<i>Status¹</i>
1	Tank Storage (LLGF, SLGF processing building, Covered Above-Ground Storage and Equalization Tanks)	SM – long term periodic groundwater monitoring
2	Kiln Supply Pump House	NFA
3	Incinerator/Energy Recovery Units	NFA
4	Surface Impoundments (Settling Pond and Adjacent De-Watering Area), including discharge area to the Salt Kill (south end)	NFA
5	Waste Piles Areas 1, 3, 4 and 5	NFA
6	Filter/Tank Sludge Storage Areas	NFA
7	Tanker/Truck Roll Off Staging Area	NFA
8	Employee Parking Lot, Discharge Area and Floor Drain	NFA

<i>Number</i>	<i>SWMU(s) or AOC(s)</i>	<i>Status¹</i>
9	Shale Fine Land Fill	NFA
10	Shale Fine Leachate Pond	NFA
11	Interim Waste Water Treatment/Sludge Container Staging Area	NFA
12(a)	Scrap Yard (aka Bone Yard) Area Soils	NFA
12(b)	Transformer Pad Vicinity	SM – inspection and repair of asphalt cap
13	Salt Kill Creek	NFA
14	North and East Site Perimeter Fence Area	NFA
15	Maintenance Garage	NFA
16	Quarry Pond	NFA
17	Industrial Sewers/Hazardous Waste Feed Pipelines	NFA

1. *The February 2015 Final Statement of Basis discusses these requirements in greater detail and is a document incorporated by reference.*
2. *SM – Site Management requirements per the 2015 Final Statement of Basis.*
3. *NFA – No Further Action*

- b. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits or by other means.

B. Green Remediation

1. The Permittee must make best efforts to implement green remediation practices in the performance of the requirements of the Work, including but not limited to performance of a RCRA Facility Investigation, Corrective Measures Study, Interim Corrective Measure, Corrective Measures Implementation and Post-Closure/Effectiveness Evaluations to maximize to the extent practicable, sustainability, reduce energy and water usage, promote carbon neutrality, promote materials reuse and recycling, and protect and preserve land resources.
2. The Permittee must make best efforts to utilize concepts and techniques presented in the New York State Department of Environmental Conservation – DEC Program Policy DER-31/Green Remediation, most recent edition.
3. The Permittee must report Green Remediation metrics as required by **Condition F of Schedule 1 of Module I.**

**RCRA PART 373 PERMIT
EXECUTIVE SUMMARY/FACILITY BRIEFING DOCUMENT**

**NORLITE, LLC
COHOES, NEW YORK**

**June 2014
Revised June 2016**

**RCRA PART 373 PERMIT
EXECUTIVE SUMMARY/FACILITY BRIEFING DOCUMENT**

**NORLITE, LLC
COHOES, NEW YORK**

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1.0 FACILITY DESCRIPTION

1.1 Facility Permit Information

Permittee Name:	Norlite, LLC
Facility Name:	Norlite, LLC
Facility Location:	628 So. Saratoga Street, Cohoes, NY
EPA ID No.:	NYD080469935
DEC Permit No.:	04-0103-16/16
DEC DER No.:	401041
Commercial/Non-Commercial TSDF:	Commercial TSDF
Facility Contact:	Tita LaGrimas, Executive VP of Environmental Affairs
DEC Contact/Responsible Permit Writer:	David Lates, NYSDEC
Initial/Renewal Permit:	Renewal Permit
Permit Term/Expiration Date:	5 years / Expires January 1, 2021
Estimated Closure Cost:	See Attachment C
Estimated Post-Closure Care Cost:	NA
Estimated Corrective Action Cost:	\$97,000 (November 2013)
On-site Environmental Monitor(s):	Joseph Hadersbeck, NYSDEC

1.2 General Description

The Norlite LLC facility is a manufacturer of lightweight aggregate. The lightweight aggregate raw material is shale that is mined on the property. To produce the lightweight aggregate, the shale is introduced to two rotary kilns where it is heated and expanded. The

aggregate material is crushed and sized to meet the customers' specifications and is the necessary ingredient needed to produce lightweight concrete.

The kilns are fueled by natural gas, fuel oils, used oils, comparable fuels and hazardous waste fuels. The primary heat source is the hazardous waste fuels. The kilns are considered industrial furnaces and are equipped with air pollution control systems to comply with emission standards for industrial furnaces burning hazardous waste under the Resource Conservation and Recovery Act (RCRA) and the Clean Air Act – Maximum Achievable Control Technology (MACT).

Hazardous wastes received from off-site are a mixture of industry related solvents and oils from an assortment of chemical and pharmaceutical manufacturers, petroleum refinement and storage facilities, and other hazardous waste treatment companies.

1.3 Background Information

Norlite LLC is located on the southern boundary of the City of Cohoes, New York. Norlite LLC is a wholly owned subsidiary of Tradebe Environmental Services LLC. Norlite's aggregate plant has been in existence since 1956. The facility consists of a production operation and the shale quarry. Norlite's processing facility occupies about 12 acres of a 221 acres plot owned by Norlite. Norlite's primary activity has always been the production of expanded shale aggregate. The facility began using alternative fuels in the late 1960s, prior to this time the primary fuel had been coal. The facility obtained interim status as a hazardous waste treatment facility in the early 1980s and has maintained compliance with the new regulations. The early 1990s saw a significant upgrade in the facility's fuel storage and delivery system. The facility was the second hazardous waste burner in the country to demonstrate compliance with the hazardous waste combustors MACT.

1.4 Site Map

Please see permit drawing labeled as 373-Map REVISED which details the facility's permitted units, boundaries, wind rose, north directional, facility topography. For reference a copy of the site map has been attached to this document.

1.5 Other Facility Permits

The facility holds the following permits to support activities at the site.

- Wastewater Discharge (SPDES): Permit #4-0103-16/20
- Mining Permit: Permit #4-0103-16/19
- Title V Permit: Permit #4-0103-16/48
- Chemical Bulk Storage Registration: Reg. #4-000198
- Petroleum Bulk Storage Registration: Reg. #4-052574

2.0 RCRA PERMITTED UNITS

The following table summarizes the specific permitted units and activities at the facility:

Unit Type ¹	No. of Areas/Units	Activity Type	Waste Type	Quantity
Containers (S01) ²	2 areas 267 units	Storage	Hazardous Waste Fuels	14,685 gallons
Tanks (S02)	3 areas 15 units	Storage	Hazardous Waste Fuels	155,579 gallons
Industrial Furnaces (T03)	1 areas 2 units	Treatment	Hazardous Waste Fuels	62 million BTU/hour/kiln

Footnotes:

1. Unit codes are as described in the Part A Application.
2. Does not include 13 parking spaces in the Tanker Truck & Onsite Rolloff Staging Area

3.0 CORRECTIVE ACTION SUMMARY

The following table summarizes the ongoing corrective action activities occurring at the facility:

Location Name / Designation	Activity Description	Estimated Completion Date
Site Wide	Site Management Plan (SMP) Development	2016
Site Wide	Environmental Easement Development/Filing	TBD based on SMP

4.0 POST-CLOSURE CARE/SITE MANAGEMENT

The facility has an NYSDEC-approved:

Yes No

☐ ☒ Post-Closure Plan

☐ ☒ Site Management Plan

The following table provides a summary of the post-closure care and site management activities currently occurring at the facility:

Area/Regulated Unit	Activity Description

4.1 Institutional Controls

There are no institutional controls in place for the facility at the time of this permit revision.

4.2 Engineering Controls

The facility prevents the release of hazardous materials from the site by using safety and air pollution controls.

All hazardous waste, petroleum bulk storage and chemical bulk storage areas have been constructed with secondary containment systems made of materials that will prevent a release from the containment area into the environment. Hazardous waste secondary containment areas are inspected daily and others are inspected at a minimum of once a month for cracks or other damage which could allow the escape of released materials.

To prevent releases to the atmosphere, the hazardous waste storage are blanketed with inert nitrogen gas and the tanks are vented to the kilns via a sealed system to control emissions.

The kilns themselves are operated under negative pressure and vented through air pollution control systems including multi-cyclone particulate control, heat exchangers, fabric filter baghouses and wet scrubbers.

To reduce aggregate dust and particulate releases, the facility has implemented a Fugitive Dust Control Plan. These procedures ensure that aggregate dust and other potential airborne particulates are not released from the site.

5.0 ISSUES AND CONCERNS

The following sections describe any potential issues or concerns for the facility related to its hazardous waste permit.

5.1 Human Health and Ecological Risk Assessment

Norlite LLC collected emissions data from 1999 to 2002 and demonstrated that carcinogenic and non-carcinogenic risks associated with the operation of the kilns are below the required USEPA benchmarks of 1E-5 and 0.25, respectively. Norlite's emissions have not increased since this data was collected and risk calculations were performed.

5.2 Regulatory Compliance History

Norlite received Order on Consent R4-2009-0610-101 in 2010. Norlite has completed all items in the Schedule of Compliance except for items related to Paragraph 12 of the Schedule of Compliance. Paragraph 12 specifically deals with fuel blending and fuel delivery to the kilns from the Fuel Farm area. Norlite has been working with the Department to complete the requirement of this schedule item.

Norlite received Order on Consent R4-2014-0017-6 on January 24, 2014. Items related to this permit include storing a vacuum truck in a non-permitted area, a missing sign on a storage tank, Best Management and Fugitive Dust Plan updates, and failure to provide a public outreach website.

Finding from past inspections were captured in the January 24, 2014 Order on Consent.

5.3 Unresolved Issues and Concerns

At this time there are no unresolved issues or concerns which are not already being addressed or are in the process of being completed.

5.4 Compliance Schedule Items

To comply with Paragraph 12 of the Order on Consent R4-2009-0610-101, Norlite intends to incorporate an automated fuel delivery system at the kilns into the new permit. Norlite received approval of the concept of the new system on January 13, 2014. Once overall approval has been granted the new automated system will need to be identified in the permit.

5.5 Public Participation

The company is well engaged with the Towns of Cohoes and Green Island and maintains an open-door policy for the community to visit the site and view the operations.

5.6 Upcoming Significant Permit Modifications

The facility has proposed to make minor feedrate changes to the operation based on the data from the latest Comprehensive Performance Test, conducted in October 2010 and January 2011.

5.7 Upcoming Construction/Closure Activities

The facility is not proposing any construction activities at this time. The facility will be proposing the closure of the SP-100 Tank located in the the Fuel Farm. Once the tank has been closed and removed, the facility will be proposing a new drum stacking pattern for inclusion with the permit.