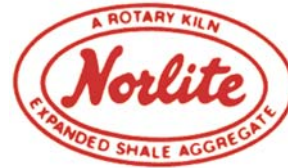


Norlite, LLC



628 SO. SARATOGA STREET
PO BOX 684
COHOES, NY 12047
PHONE: (518) 235-0401
FAX: (518) 235-0233

April 26, 2017

Richard Mustico
NYS Department of Environmental Conservation-Region 4
Division of Environmental Remediation
1130 North Westcott Road
Schenectady, NY 12306

RE: Hazardous Waste Storage Tank 100A Repair Certification
Norlite LLC, NYSDEC Permit No. 4-0103-16/16
EPA ID No. NYD080469935

Dear Mr. Mustico:

This letter is notification of the completed engineering certification of LGF Tank 100A located at the LGF Building at the Norlite Facility as referenced above. Tank 100A is identified more specifically in the current draft RCRA Permit in Schedule 1 of Module I. The complete certification document is provided as an attachment to this notice.

The tank has been certified in accordance with 6NYCRR Part 373-2.10, and Module IV of the current permit referenced above. At this time the tank is coated on the exterior as specified in the certification and being prepared for operation.

For informational purposes, in addition to the regulatory and permit requirements noted above, the repair of Tank 100A followed, as applicable, the Joint American Petroleum Institute (API) and American Society of Mechanical Engineers (ASME) API Code 510-Pressure Vessel Inspection Code: In-Service Inspection, Rating, Repair, and Alteration, latest edition.

The ASME Code and other construction codes are written for new construction; however, most of the technical requirements for design, welding, NDE, and materials can be applied to the inspection, rerating, repair, and alteration of in-service pressure vessels. If an item cannot follow the ASME Code because of its new construction orientation, requirements for design, material, fabrication, and inspection shall conform to API 510 rather than to the ASME Code. If in-service vessels are covered by requirements in the ASME Code and API 510 or if there is a conflict between the two codes, the requirements of APT 510 shall take precedence. As an example of the intent of API 510, the phrase "applicable requirements of the ASME Code" has been used in API 510 instead of the phrase "in accordance with the ASME Code."

Tank 100A was repaired utilizing all ASME Code requirements for new tanks based on the 2015 edition.

Norlite, LLC will maintain the certification of construction in accordance with 6 NYCRR 373-2.10(c)(7). As outlined in Module IV.B.4 of the current permit, Norlite will not use the repaired tank system until the certification statement has been delivered to the Department and the Department has performed its own inspection and formally accepted the engineering certification supplied.

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
Prince M. Knight III
Laboratory, Environmental and Compliance Manager

cc: Michael Cruden, NYSDEC
Joseph Hadersbeck, NYSDEC
Thomas J. Killeen, NYS DEC
Michael Rich, NYS DEC
Darrell Monk, Norlite
Tita LaGrimas, Tradebe
Sara Kowalczyk, Tradebe