

# Norlite Corporation



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June 6, 2006

Mr. Thomas Cullen  
Regional Engineer  
NYSDEC - Region 4  
1150 North Westcott Rd.  
Schenectady, NY 12306-2014

Re: DEC # 4-0103-16/20-0  
SPDES # NY0004880  
Norlite Corporation  
Best Management Practices (BMP) Plan Update

Dear Mr. Cullen:

The Norlite Corporation (Norlite) is submitting revised page # 14 of the BMP which addresses how Norlite manages the water at the Tanker Truck Staging area. Please insert the attached page into your copy of the BMP.

Should you have any questions regarding this letter, please contact me at (518) 235-0401.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Sullivan". The signature is stylized and somewhat cursive.

Thomas J. Sullivan  
Environmental Manager

Cc: Carol Lamb-LaFay – NYSDEC R4  
William Clarke – NYSDEC R4

Attachment



#### **2.2.2.2.1 Description**

The Truck Staging Area (or Staging Area) is used to temporarily stage incoming hazardous waste, used oil and plant chemicals deliveries (if necessary) for the time necessary to complete waste acceptance procedures. This area has been designed to ensure that in the event that a leaking delivery tanker or trailer is received, the leaking tanker or containers can be managed in a manner to prevent releases to the environment. This area is located immediately to the north of the LGF off-loading and fuel farm area and is shown on Figure 2-2.

#### **2.2.2.2.2 Truck Staging Area Spill Control and Containment**

In the event that a spill does occur, Norlite shall isolate the leaking tanker in the Truck Staging Area to minimize the potential for impacting other vehicles that may be present in the Staging Area. The source of the spill shall then be stopped and in accordance with Norlite's Contingency Plan, appropriate measures shall be taken to minimize migration of spilled materials in the containment area. After the situation has been stabilized, Norlite shall remove and manage any contaminated materials in accordance with the Contingency Plan and Norlite's Safety policy.

#### **2.2.2.2.3 Release Assessment for Truck Staging Area**

A spill in the Truck Staging Area shall be contained by the lined, bermed, containment area thereby preventing any runoff or contact with surrounding areas. Smaller spills shall be contained in the immediate area of the spill since the shale fines cover acts as an absorbent and shall effectively prevent the migration of small spills. Larger spills may migrate downslope towards the northeast corner where it can be collected for subsequent treatment and disposal. Any contaminated shale fines shall be removed for proper treatment and/or disposal.

As noted above, the containment area has been designed with capacity sufficient to hold the contents of at least 10 bulk tankwagons. Norlite shall manage the staging of shipments in the Truck Staging Area so that the RCRA containment volume standards are not exceeded.

#### **2.2.2.2.4 Truck Staging Area BMP**

The Truck Staging Area is an area in the Norlite plant in which there is a potential for storm water to contact LGF or non-hazardous waste materials. Accordingly, Norlite's Staging Area spill control procedures require that all spills be removed in a timely fashion to prevent the potential for contact with storm water. Through proper maintenance of the Staging Area, Norlite can manage the storm water as non-contaminated media.

Norlite shall remove storm water in accordance with the procedures described below to help ensure that any storm water that does collect in the Staging area shall not be impacted in the event of a spill.

All water in the LGF Truck Staging area is either left to evaporate during the summer months or is removed and either incinerated on-site or sent to a wastewater treatment facility.