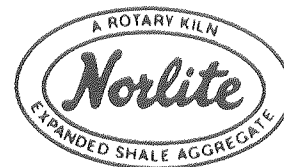


Norlite, LLC



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

Kate Kornak
Environmental Analyst, Division of Environmental Permits
NYS DEC – Region 4
1130 North Westcott Road
Schenectady, New York 12306

October 10, 2017

Re: Norlite, LLC –DEC#4-0103-16/20-0 SPDES#NY-000 4880– Pilot Study Request – Mercury
Precipitating Agent (MPA) – TMT 15

Dear Ms. Kornak:

Norlite, LLC (Norlite) is submitting this letter as a request for a pilot study approval regarding permit #NY-000 4880. Norlite is submitting the specifics of the study outlined below. Although this would be considered a permit modification to Norlite's current permit, the goal is to implement these changes for the proposed new permit with the expected Effective Date of Permit (EDP) of November 1, 2017. Therefore, a modification request should not be required.

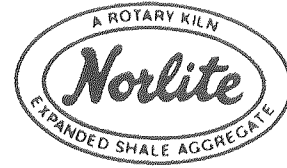
In summary, Norlite is proposing to add an additional WWTP chemical, TMT 15, directly into the Equalization (EQ) tank in order to promote more efficient mercury removal. The TMT 15 is considered a Mercury Precipitating Agent (MPA) and should allow Norlite to meet the more stringent discharge limits expected in the upcoming permit and schedule of compliance. Please reference the included WTC Notification Form for additional information.

All preliminary bench tests indicate that using TMT 15 will be a significant improvement. However, to ensure that it translates to a larger scale, Norlite is requesting permission to conduct an interim study as follows:

1. Provide a tote of TMT 15 to the WWTP and configure it for introduction
2. Use TMT 15 for a period not to exceed 7 days
3. Regular sample monitoring will be conducted at outfalls 06A and 006 to ensure SPDES compliance (all permit monitoring parameters will be considered on the monthly DMR)
4. Specific review and analysis for Mercury will be conducted using EPA 1631 for low level analysis.
5. A final report will be prepared for the Department's review 7 days after testing is complete
6. Norlite will return to normal WWTP operation until such time that the Department has approved the use of the TMT 15*.

*Due to the time frame of the upcoming EDP, Norlite would like to perform this pilot study during the week of October 16, 2017. Therefore, we respectfully request an approval as soon as possible. We will supply the results and the report in a timely manner. Furthermore, since it is Norlite's intention to implement the use of TMT 15 on November 1, 2017, in order to facilitate departmental approval, Norlite's Vendor, Surpass Chemical, Inc., has suggested that the department reference a similar pilot study conducted at GlaxoSmithKline, plc. which was approved by NYS DEC.

Norlite looks forward to working with the Department to help reduce levels of mercury in our final WWTP discharge.



Norlite, LLC

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

Sincerely,

A handwritten signature in black ink, appearing to read "Prince M. Knight III".

Prince M. Knight III
Laboratory, Environmental and Compliance Manager

Ecc: Carrie Smith – NYS DEC
Shayne Mitchell – NYS DEC
James Malcolm – NYS DEC
Joseph Hadersbeck – NYS DEC
Darrell Monk – Norlite
David Maguffin – Norlite
Kenny Huy – Tradebe, NE
Tita LaGrimas – Tradebe
Sarah Kowalczyk - Tradebe