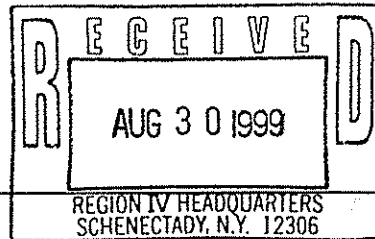


Norlite Corporation



628 SO. SARATOGA ST.
P.O. BOX 694
COHOES, N.Y. 12047
TEL: (518) 235-0401
FAX: (518) 235-0233

August 27, 1999

Mr. Jeffrey Gregg
New York State Department of
Environmental Conservation
Region 4, Division of Environmental Permits
1150 North Westcott Road
Schenectady, NY 12306-2014

Re: Fuel Farm Expansion Material Transfer Area 2.

Dear Mr. Gregg:

Norlite is prepared to proceed with the construction phase of the Fuel Farm Material Transfer Area 2. This expansion, a minor permit modification, was approved by the Department in a letter from Mr. William Clarke(NYSDEC) to Mr. William Ziegler(Norlite) dated November 16, 1995.

With the successful completion of the April 1999 Trial Burn as well as other significant facility improvements, we are ready to move forward with this expansion.

The original expansion plans referenced Malcolm Pirnie drawing No. 2475-50. Norlite has enclosed an updated drawing prepared by Mr. Harvey M. King P.E.. Harvey King's drawing No. HMK-2475-99 shall replace the original Malcolm Pirnie drawing. The overall expansion scope has remained the same although the Harvey King drawing shows amendments to the general layout of the original scope. These Amendments are as follows:

- ▶ Increased the surface slope from 1.5% to 2.0% to improve secondary containment capacity and offloading.
- ▶ Added a containment management system that uses the existing containment system inside the LGF storage building for improved housekeeping.
- ▶ Maintain carbon vapor recovery system in its existing location.

Norlite is anxious to move forward with this expansion as Autumn inclement weather is approaching and could delay construction activities. As such Norlite is requesting your expedient review and approval of the above mentioned amendments to this minor permit modification.



If you have any questions or additional information is required, please feel free to contact me at (518) 235-0401 Ext. 4049.

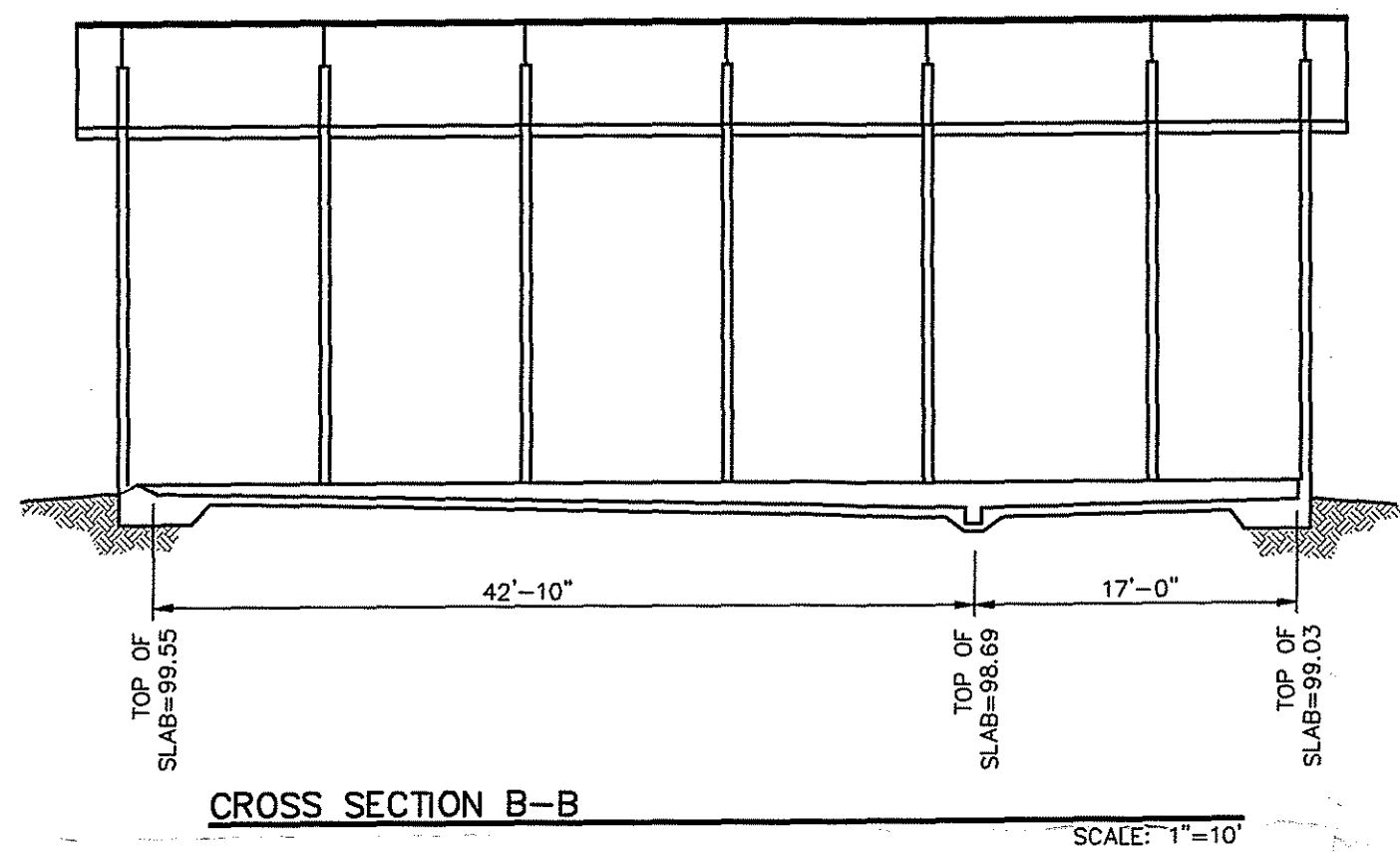
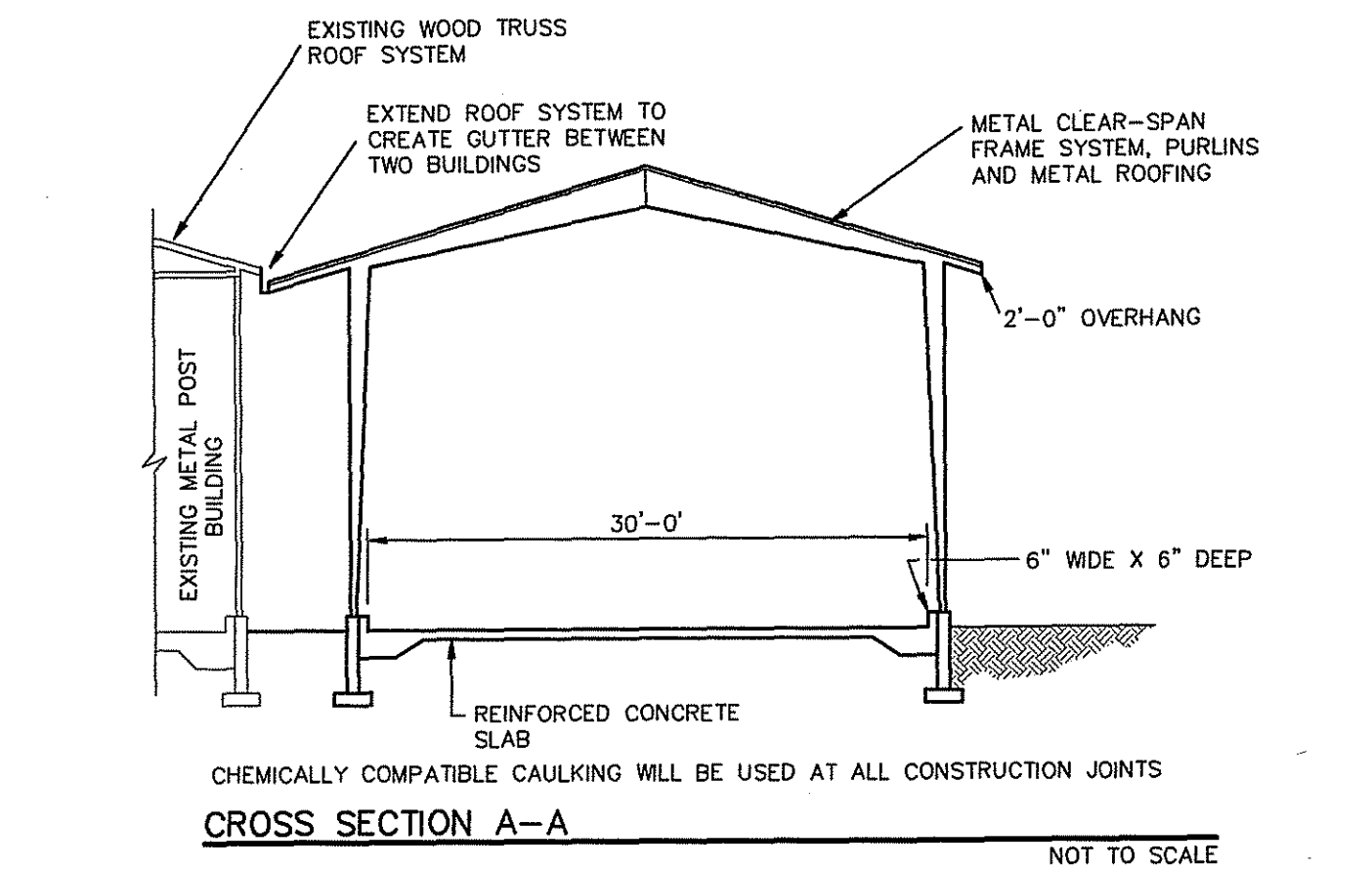
Sincerely,

NORLITE CORPORATION

A handwritten signature in cursive script that reads "Stan C. Milos".

Stan C. Milos
Environmental Manager

cc: Parag Amin (NYSDEC)



CONTAINMENT CALCULATIONS

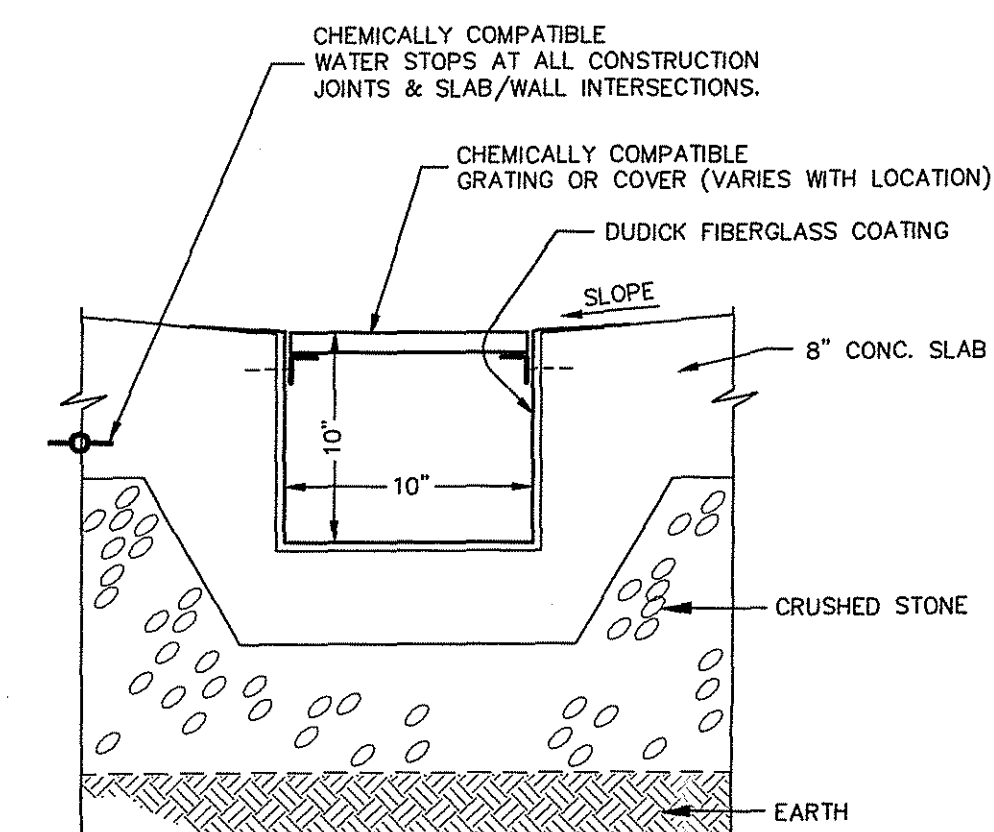
EXISTING MATERIAL TRANSFER AREA #1
 THE EXISTING MATERIAL TRANSFER AREA SERVES AS A TRANSFER FACILITY FOR DRUMS AND/OR BULK TANKERS OF 6,500 GALLON MAXIMUM CAPACITY.
 REQUIRED CONTAINMENT CAPACITY: 6,500 GAL. X 1.1 = 7,150 GAL.
 AVAILABLE CONTAINMENT CAPACITY: $0.5 (0.48' + 1.20') \times 30' \times 48' \times 7.48 \text{ GAL./CF.} = 9,048 \text{ GAL.}$
 *DOES NOT ACCOUNT FOR DISPLACEMENT OF STORED DRUMS.

MATERIAL TRANSFER AREA #2
 THIS MATERIAL TRANSFER AREA WILL SERVE AS A TRANSFER FACILITY FOR DRUMS AND/OR BULK TANKERS OF 6,500 GALLON MAXIMUM CAPACITY.
 REQUIRED CONTAINMENT CAPACITY: 6,500 GAL. X 1.1 = 7,150 GAL.
 AVAILABLE CONTAINMENT CAPACITY: 13,724 gal.

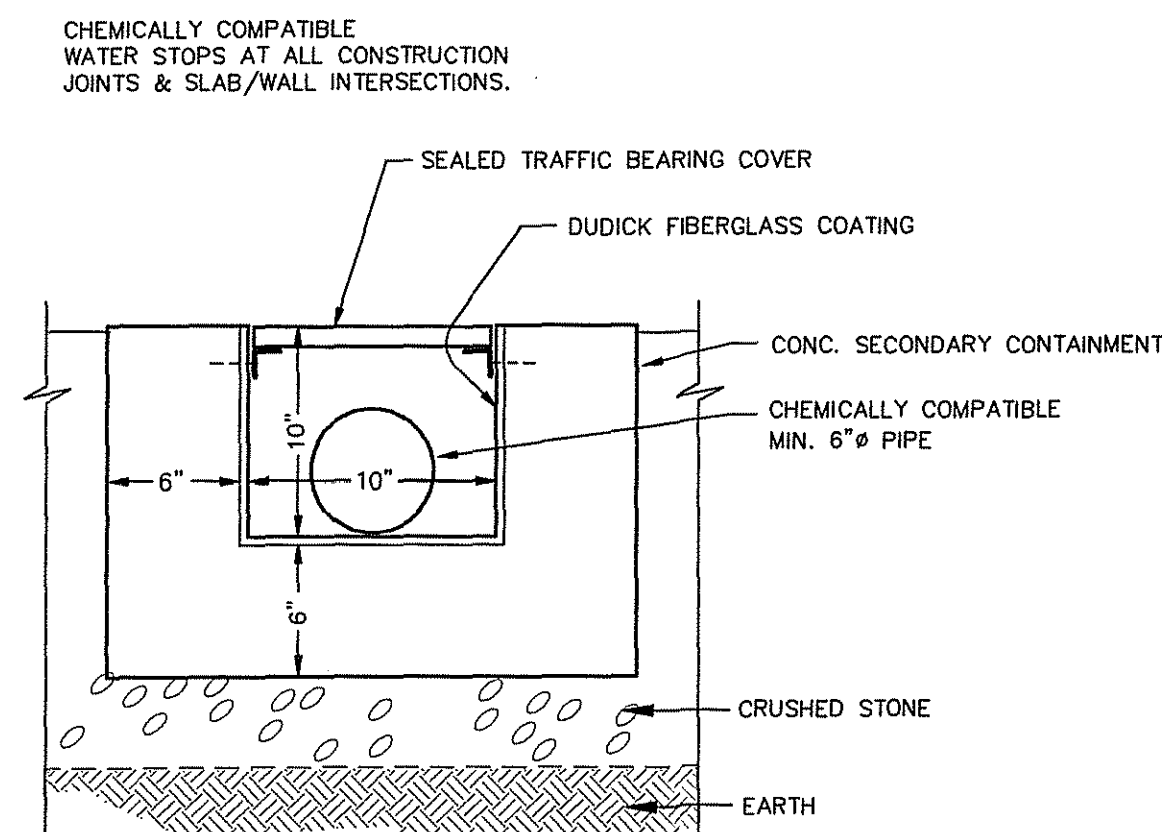
COMBINED CONTAINMENT CAPACITY FOR AREAS #1 AND #2
 9,048 GAL. + 13,724 GAL. = 22,772 GAL.

NOTES:

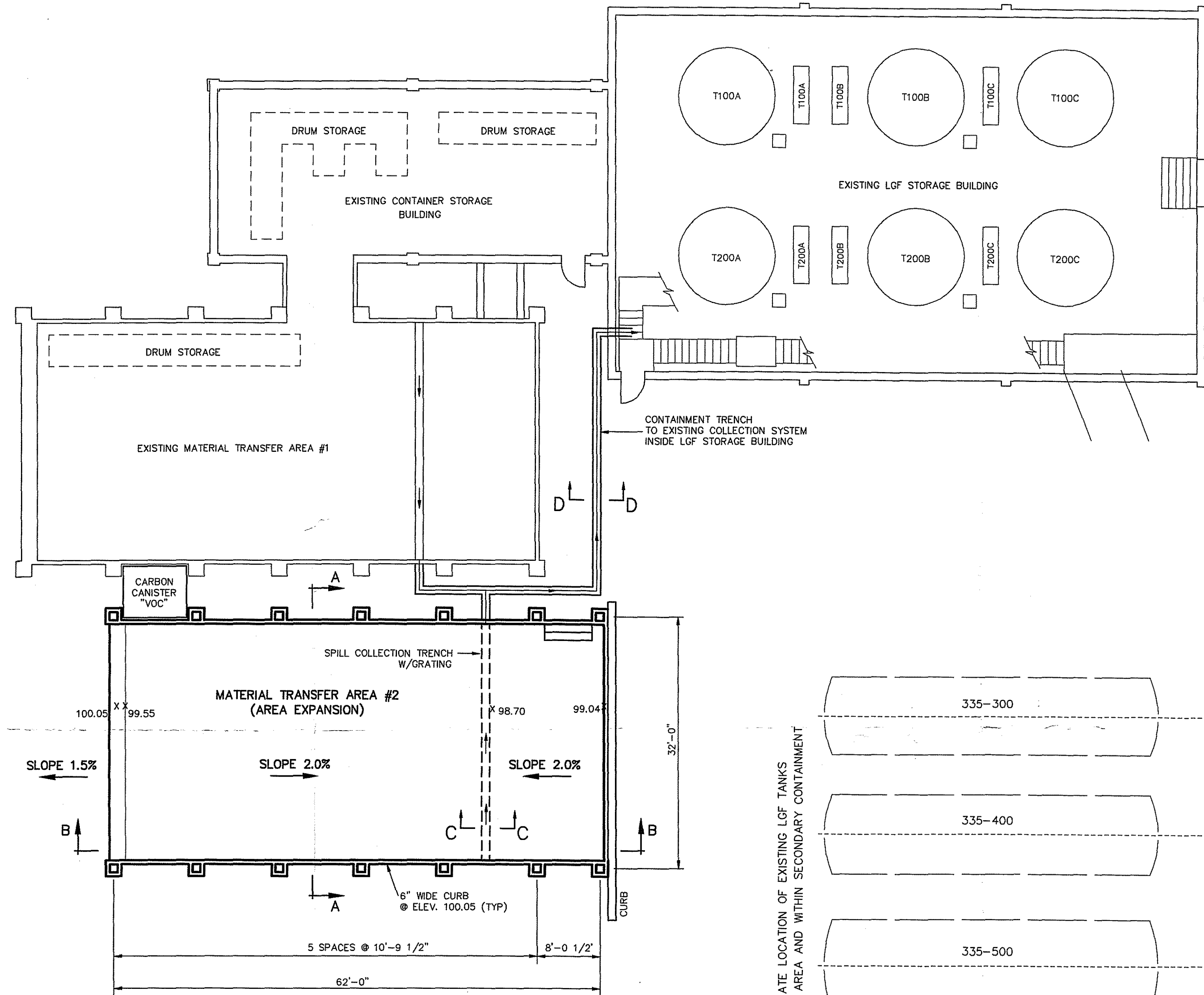
1) EMISSIONS FROM MATERIAL TRANSFER AREAS WILL BE DISCHARGED DIRECTLY TO THE KILN THROUGH EXISTING PERMITTED SYSTEMS.



SPILL COLLECTION TRENCH (INTERIOR)
 CROSS SECTION C-C

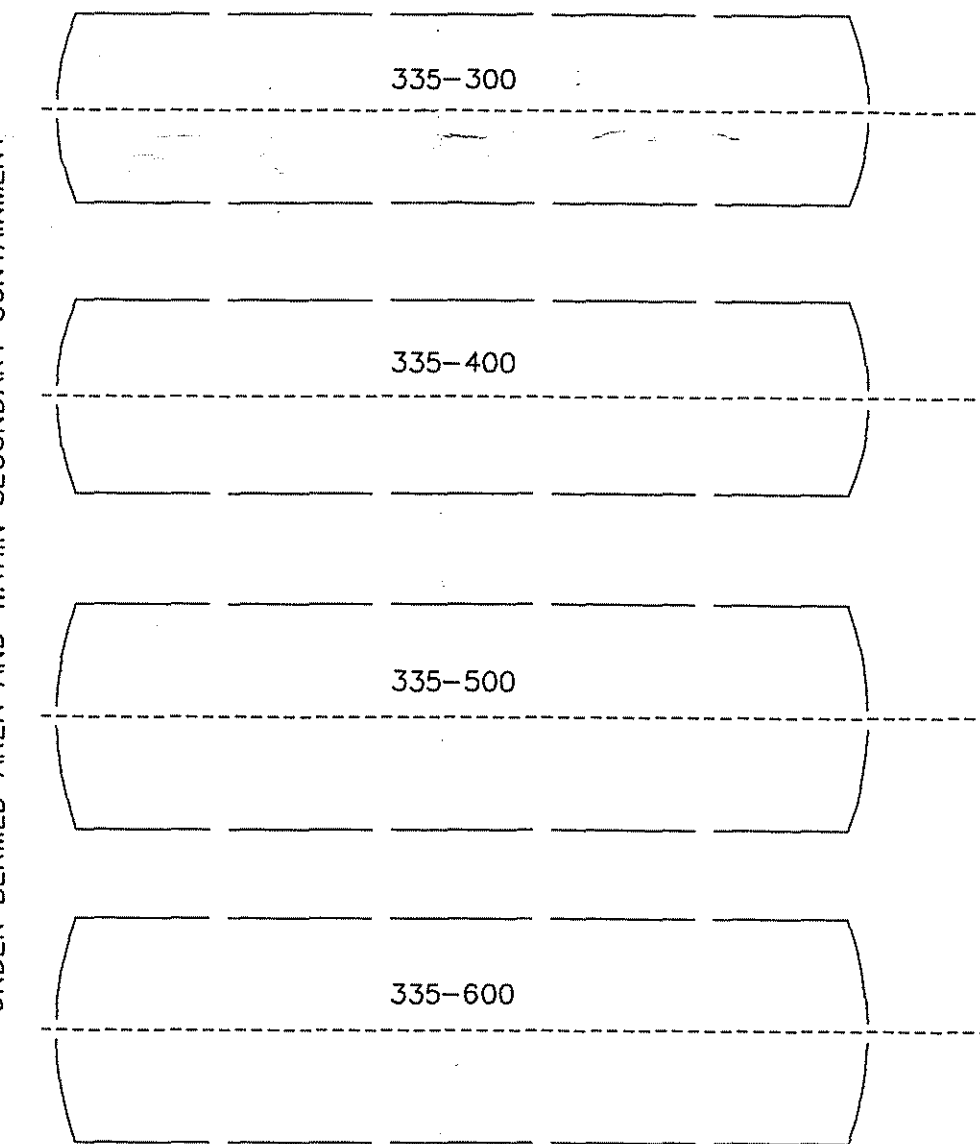


CONTAINMENT TRENCH (EXTERIOR)
 CROSS SECTION D-D
 (TRAFFIC BEARING CONSTRUCTION)

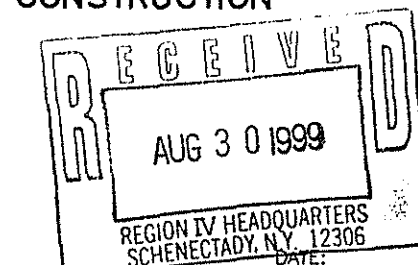


PLAN VIEW
 SCALE: 1"=10'

APPROXIMATE LOCATION OF EXISTING LGF TANKS UNDER BERMED AREA AND WITHIN SECONDARY CONTAINMENT



FOR PERMITTING PURPOSES ONLY
 NOT FOR CONSTRUCTION



MAP REFERENCE:
 MAP TITLED "SITE PLAN AND SECTIONS, TRUCK UNLOADING FACILITY EXPANSION: PERMIT MODIFICATION APPLICATION, NORLITE CORPORATION, COHES N.Y. (2475-50)" DATED NOVEMBER 1995 AND PREPARED BY MALCOLM PIRNIE, INC.

CLIENT APPROVAL:		 HARVEY M. KING, P.E. ENVIRONMENTAL ENGINEERS & SCIENTISTS 4 STONY BROOK DRIVE, REXFORD, NEW YORK 12148-1808	
NORLITE CORPORATION 6 NYCRR PART 373 PERMIT WASTE TRANSFER FACILITY EXPANSION		PROJECT NO REF.: FILE NAME REF.: DWG NO. REF.: HMK-2475-99 REV: 2	
DRAWN BY: T.V.B. CHECKED: H.M.K. APPROVED:	DATE: 08/24/99	PLOT SCALE: PLOT DATA: DATE:	PROJECT NO REF.: FILE NAME REF.: DWG NO. REF.: REV: