

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 4  
1130 North Westcott Road, Schenectady, NY 12306-2014  
P: (518) 357-2069 | F: (518) 357-2460  
www.dec.ny.gov

September 4, 2020

Mr. Prince Knight  
Environmental and Regulatory Compliance Manager  
Tradebe Environmental Services/Norlite, LLC.  
628 South Saratoga Street  
Cohoes, NY 12047  
Sent electronically: [Prince.Knight@tradebe.com](mailto:Prince.Knight@tradebe.com)

**RE: Notice of Approval of Comprehensive Performance Test (CPT) Plan  
Public Notice Requirement  
Norlite, LLC.  
Air Title V Permit; DEC ID# 4-0103-00016/00048**

Dear Mr. Knight:

Enclosed is a letter of approval for the CPT Plan dated August 21, 2020 for Kiln #1 and Kiln #2 at the Norlite, LLC. facility located in the City of Cohoes. Also enclosed is a Public Notice of Approval document which you are to have published in the Albany Times Union by September 9, 2020. Please request the newspaper to provide you with a notarized "Proof of Publication" for the notice, and promptly forward a copy to this office. Please recognize that failure to comply with this requirement may delay the start of the CPT. If publication of the notice cannot occur by September 9, 2020, please notify me.

A copy of the approved CPT Plan is available for review by interested persons on the DEC website at <http://www.dec.ny.gov/permits/6061.html> Please also post the approved CPT Plan on Norlite's public website as well. Paper copies will be available at the DEC Region 4 office during the 60-day public notice period.

Norlite must also forward a copy of the Public Notice of Approval document to parties on its facility/public mailing list.

If you have any questions regarding the CPT Plan approval, please contact Mr. Benjamin Potter at (518) 357-2345. Questions regarding the procedural processing of the public notice component may be directed to me.

Sincerely,



Kate Kornak  
Deputy Regional Permit Administrator  
Region 4 Division of Environmental Permits

Encls: CPT Approval Ltr, Public Notice of Approval

Ecc: B. Potter  
M. Cronin  
D. Prunier  
D. Hoffert  
V. Schmitt  
J. Hadersback  
R. Buettner, EPA Rg. 2  
D. McGuffin, Tradebe  
T. LaGrimas, Tradebe

Mr. Prince Knight  
Environmental and Regulatory Compliance Manager  
Tradebe Environmental Services/Norlite, LLC  
628 South Saratoga Street  
Cohoes, NY 12047

September 3, 2020

Re: **Notice of Approval of the 2020 Comprehensive Performance Test Plan (CPT)**  
**DEC Title V/DEC ID#4-0103-00016/00048**

Dear Mr. Knight:

The New York State Department of Environmental Conservation (DEC) has approved the Norlite CPT plan dated August 21, 2020. The test is designed to demonstrate compliance with the air emission standards required by the Maximum Achievable Control Technology (MACT) for the Hazardous Waste Combustors Rule promulgated by the United States Environmental Protection Agency (USEPA), specifically 40 CFR Part 63 Subpart EEE. This plan includes tests to demonstrate compliance with the standards while incinerating off-site waste oils and liquid hazardous wastes. The plan also includes information on a performance evaluation (PE) for the continuous monitoring systems (CMSs) and for the continuous emissions monitoring systems (CEMs) to be performed as part of the test.

The CPT results report (Notice of Compliance (NOC)) is to be submitted to the Department within 90 days from the date that the test is completed documenting compliance or non-compliance with the emission standards. If you have any questions regarding these requirements, please contact me at 518-357-2345.

Sincerely,



Ben Potter, P.E.

Regional Air Pollution Control Engineer  
DEC Region 4  
Division of Air Resources

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION (DEC)  
Notice of Approval of a Comprehensive Performance Test (CPT) Plan**

**Applicant:** Norlite, LLC  
628 South Saratoga Street  
Cohoes, New York 12047

**Date:** September 9, 2020

**Permits/Application Numbers:** DEC Title V Permit  
DEC ID#4-0103-00016/00048

**Project Location/Description:** Norlite, LLC is a manufacturer of lightweight aggregate materials produced from shale mined at the plant. Norlite operates two hazardous waste burning light-weight aggregate kilns, several crushers for processing raw and finished materials, bulk storage tanks/containers for hazardous waste and other fuels, and several miscellaneous operations related to the production of lightweight aggregate. After mining, the shale is crushed in a series of crushers before being fed to one of the two rotary lightweight aggregate kilns. The kilns are primarily fired with liquid hazardous waste from off-site sources. Norlite is also authorized to fire off- specification used oil, specification used oil, #2 oil, #4 oil, #6 oil and natural gas in the kilns. The material exiting the kilns is called clinker. The clinker is first cooled in one of the two clinker coolers before being crushed to the desired product size. The final product is called lightweight aggregate.

Pursuant to the Maximum Achievable Control Technology (MACT) for Hazardous Waste Combustors Rule promulgated by the United States Environmental Protection Agency (EPA), Norlite is required to conduct a CPT to demonstrate compliance with the air emission standards in the rule, specifically 40 CFR Part 63 Subpart EEE. Norlite has submitted a CPT plan that includes tests for air emissions of mercury and other toxic metals, particulate matter, dioxin/furans and hydrochloric acid/chlorine while incinerating off-site waste oils and liquid hazardous wastes. The plan includes a performance evaluation (PE) for the continuous monitoring systems (CMSs) and for the Continuous Emissions Monitors (CEMs).

The DEC has determined the plan to be acceptable. This notice is pursuant to 40 CFR Part 63.1207(e)(2) which requires Norlite to publish this approval and make the plan available to the public for review.

An electronic version can be found on NYSDEC's webpage at:  
<http://www.dec.ny.gov/permits/6061.html>

**Tentative Test Schedule:** Scheduled Commencement Date – November 10, 2020  
Scheduled Completion Date – November 12, 2020

**DEC Contacts:** Ms. Kate Kornak, DEC Region 4 Office, Division of Environmental Permits, 1130 North Westcott Road, Schenectady, New York 12306; Telephone (518) 357-2459 or Mr. Benjamin Potter, DEC Region 4 Office, Division of Air Resources, 1130 North Westcott Road, Schenectady, New York 12306; Telephone (518) 357-2345.

**Norlite Contact:** Mr. Prince Knight, Environmental and Regulatory Compliance Manager, Tradebe Environmental Services/Norlite, LLC, 628 South Saratoga Street, Cohoes, New York 12047; Telephone (518) 235-0401.

**Document Availability:** A copy of the CPT plan is available for review and copying at the DEC Region 4 office at 1130 North Westcott Road in Schenectady, Telephone (518) 357-2459. A copy of the plan is also available for public review on the DEC website at <http://www.dec.ny.gov/permits/6061.html>. The test plan will be accessible through November 7, 2020.