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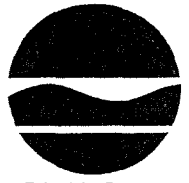
New York State Department of Environmental Conservation

Division of Environmental Permits, Region 4

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Erin M. Crotty
Commissioner

November 15, 2001

Tim Lachell
Norlite Corporation
628 South Saratoga Street
Cohoes, NY 12047-4644

RE: INCOMPLETE NOTICE
Norlite Corporation
Application #4-0103-00016/00020
Modification for Industrial SPDES
Cohoes (C), Albany (Co)

Dear Mr. Lachell:

The application you submitted requesting modification of your existing SPDES permit for the treatment and discharge of storm water from the LGF Tanker Staging Area is incomplete. Attached are comments indicating the reasons for incompleteness.

Please provide your response to the attached comments by December 12, 2001. If you have any questions, please feel free to reach me at the above phone number.

Sincerely,

William J. Clarke
Regional Permit Administrator
Division of Environmental Permits
Region 4

NORLITE-inc
Attachment
CC: C. Lamb-LaFay

The application to add an Outfall to authorize the discharge of treated stormwater collected in the Truck Staging Area and Waste Oil Secondary Containment Area has been determined to be incomplete. The application lists only solids and oil & grease as possible contaminants. More extensive sampling is required before the application can be deemed complete.

The purpose of the application is to provide sufficient information to determine if the proposed treatment will produce an effluent that is protective of the environment and to determine appropriate monitoring to ensure that the treatment system is maintained and functioning as designed. Any parameter listed as "believed present" on the permit application is authorized for discharge up to the concentration listed on the application even if not specifically listed on the SPDES permit. Since the application only lists Oil & Grease, TSS, TDS, and pH, any other parameter found in the discharge but not listed on the application is not authorized for discharge and detection at any concentration will be considered a violation of the SPDES permit.

The facility utilizes Low Grade Fuel (LGF) as the main source of fuel to heat the kilns. Low Grade Fuel is hazardous waste, generated from other industries, which is trucked to the site, blended and fed into the kiln. This waste is received from any number of industrial categories including but not limited to: Adhesive & Solvents, Auto and other Laundries, Coal Mining, Coil Coating, Electric and Electronic components, Electroplating, Foundries, Organic Chemical Manufacturing, Paint & Ink formation, Pesticides, Petroleum Refining, Pharmaceutical Preparations, Plastics, Printing and Publishing, Pulp and paperboard mills. The LGF is highly variable and could contain any of the Priority Pollutants listed in Tables 6-10 of the application. The purpose of the Truck Staging area is to temporarily stage incoming hazardous waste, used oil and plant chemicals deliveries so that in the event of a leak, the spill will be contained. The very nature of the area indicates that there is the potential for storm water to contact LGF or Used Oil. As such there is a potential for any constituent in the LGF or Used Oil to be present in the influent to the treatment system and if not properly treated, in the effluent. Furthermore, the limited sampling information provided (Oil & Grease of 62 mg/l) is not typical of clean storm water indicating that storm water has in fact come into contact with LGF or Waste Oil. Any constituent potentially present in the LGF or Waste Oil is also potentially present in the stormwater and should be indicated as such in the application.

The application should also include a discussion on how spills in the Truck Staging Area and Waste Oil Containment Area will be managed.