



OUR REPUTATION IN EVERY BAG



SUMMARY OF IMPLEMENTATION OF ADDITIONAL AIR EMISSIONS
CONTROLS AND REMEDIAL ACTIONS AT ALUF PLASTICS

SITE LOCATION: 2 GLENSHAW STREET, ORANGEBURG, NY 10962
NYS DEC ID#: 3392400190

SUBMITTED TO:
MR. GEORGE A. SWEIKERT
REGIONAL AIR POLLUTION CONTROL ENGINEER
21 SOUTH PUTT CORNERS ROAD
NEW PALTZ, NEW YORK 12561
CASE # R3-20160722-49

ITEM	DESCRIPTION	DUE DATE	STATUS	NOTES
1	Aluf will submit to NYSDEC a scope of work, which shall focus on a review of the work practices at the Facility, identify the source and the reason of the odors at the Facility, and an investigation of solutions to the odor issues.	10/21/2016	COMPLETE	Scope of work approved by NYSDEC
2	Aluf will submit to NYSDEC a report which shall include the result of the study, proposed solutions and a schedule to implement the solutions at the Facility.	1/21/2017	COMPLETE	
3	Aluf will submit complete applications for the ducted ventilation systems to the Orangetown Building Department, ACABOR, and the Zoning Board	3/17/2017	COMPLETE	ZBA hearing scheduled 5/3/2017

4	Aluf will submit complete applications for the Repro Room exhaust filtration units to the Orangetown Building Department, ACABOR, and the Zoning Board	3/17/2017	COMPLETE	ZBA hearing scheduled 5/3/2017 ACABOR hearing TBA
5	If the Repro Room exhaust must be discharged through a new emission point, modification of the NYSDEC air permit may also be needed, and in that case Aluf will apply for a modification of its air permit	3/31/2017	COMPLETE	Application for permit modification submitted to DEC. Issuance of new permit pending stack testing.
6	Aluf to perform testing of stack air emissions pursuant to NYSDEC-approved stack testing protocol	As soon as practicable following NYSDEC approval of protocol	OPEN	Draft stack testing protocol submitted to NYS DEC 3/3/2017. NYSDEC comments on draft received 3/23 and 3/24/2017, call w/NYSDEC regarding comments 3/30/2017. Additional list of parameters for stack testing received from NYSDEC 4/3/2017. Revised draft protocol incorporating NYSDEC comments and additional parameters submitted to NYSDEC 4/12/2017, follow-up call w/NYSDEC 4/13/2017. Further revised protocol responding to 4/13 call submitted to NYSDEC 4/25/2017. Awaiting NYSDEC response.
7	Aluf will order necessary parts and equipment for installation of the ducted ventilation systems and Repro Room exhaust filtration units no later than 14 days after Town approval and, if required, NYSDEC approval, and at the same time will provide NYSDEC with a schedule for installation of the ducted ventilation systems and Repro Room exhaust filtration units that takes into account time necessary for parts and equipment fabrication, delivery and installation.	OPEN		NYS DEC approval received March 8, 2017. Orangetown approval pending.

8	Once the ducted ventilation systems and Repro Room exhaust filtration units are installed, the newly-installed ventilation and exhaust filtration systems shall be run for a minimum of four hours after all extruders are shut down to ensure that no odor-causing fugitive emissions occur	OPEN		Pending installation of ventilation system (Orangetown approval needed)
9	Aluf will extend/expand the fume hoods in the Repro area as recommended	5/31/2017		
10	Aluf has installed spring-loaded closures on enclosure doors used for inspection of Repro extruder showerheads	3/31/2017	COMPLETE	
11	Aluf will complete its examination of whether the current carbon bed associated with the Repro Room can be reconfigured to allow easier testing of the carbon	3/17/2017	COMPLETE	Existing bed can handle existing production with reduced output flow rate. No reconfiguration necessary.
12	Aluf will install articulating spot vacuums for localized fume capture near Repro screen changes	5/31/2017		
13	Aluf has instructed staff not to open plant doors during operation, and has installed spring-loaded closures on all exterior personnel doors	3/3/2017	COMPLETE	
14	Aluf has installed RFID locks on all operational access doors and local alarms on other exit doors.	3/3/2017	COMPLETE	
15	Aluf will post signs reminding employees to close loading dock doors when not in use	3/31/2017	COMPLETE	Need ventilation system in place by summer
16	Aluf will propose permit conditions for frequency of filter replacement and sampling of the carbon in the carbon bed associated with emission from the Repro Room	3/3/2017	COMPLETE	Schedule fixed and changes documented, condition pending new air permit
17	Aluf will replace all Repro filter housings (<i>conditional on Aluf locating supplier to replace existing housings, as current housings were custom-made and original supplier is no longer in business</i>)	5/31/2017		Pending vendor schedule development

18	Aluf will ensure that temperature controllers on its extruders cause a high-temperature alarm to be activated when extrusion melt temperature reaches 500 degrees Fahrenheit and shall design and implement internal procedures to respond to high temperature alarms	4/30/2017	COMPLETE	
19	Aluf shall ensure that temperature controllers on its extruders' melt temperature cause automatic shutdown of the extruders when extrusion melt temperature reaches 550 degrees Fahrenheit.	4/30/2017	COMPLETE	
20	Aluf shall record all instances of high temperature alarms and/or high temperature shutdowns. Data will be maintained in the plant PLC control system architecture on a first-in, first-out basis.	4/30/2017	COMPLETE	
21	Aluf has also implemented inspection and screening for incoming scrap plastic to be reprocessed. Aluf only accepts film, compressed blocks, pellets, or chopped scrap of polyethylene. Any other type of plastic in film or any other form is to be rejected.	3/3/2017	COMPLETE	Any scrap film produced within Aluf facilities is excluded from this raw material inspection and screening, as Aluf scrap is made with only polyethylene materials and is not printed.
21	Further screening of postindustrial scrap film will include rejection of any film which includes full face printing. Full face printing is considered film in which 80% or more of the film surface is covered with ink or other printing media.	3/3/2017	COMPLETE	Any scrap film produced within Aluf facilities is excluded from this raw material inspection and screening, as Aluf scrap is made with only polyethylene materials and is not printed.