



PROPOSAL FOR ADDITIONAL PERMIT CONDITIONS  
AIR STATE FACILITY PERMIT ID # 3-3924-00190/00006  
ISSUED TO API INDUSTRIES INC/ALUF PLASTICS DIVISION

DRAFT: FOR NYSDEC REVIEW & APPROVAL

MARCH 3, 2017

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

**PROPOSED ADDITIONAL/MODIFIED PERMIT CONDITIONS:**

1. Extrusion Temperature Control: In order to prevent process temperatures from reaching the point where significant degradation of polyethylene may occur, Aluf Plastics shall 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 implement internal procedures to respond to high temperature alarms. Aluf Plastics shall ensure that temperature monitors of its extruders' melt temperature cause automatic shutdown of the extruders when extrusion melt temperature reaches 550 degrees Fahrenheit. Aluf Plastics shall log all instances of high temperature alarms and/or high temperature shutdowns, and maintain such logs for inspection.
2. Reprocessing Input Inspection/Screening: 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. 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.

Aluf will make operational observations of the Repro process, and any film that is identified as generating excessive smoke will be tagged for rejection in future raw material entry inspection and screening. A rejection log will be maintained and posted in the scale room for incoming scrap plastic to be reprocessed.

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.

3. Exterior Door Closure: Aluf shall install automatic closure devices and alarms on exterior personnel doors at the facility in accordance with fire safety requirements. Alarms on exterior personnel doors shall alarm locally and shall alert a shift supervisor if any door remains open longer than 15 minutes. All door alarms shall be logged and logs shall be available upon inspection.

Loading dock doors shall be closed when not in use. When loading dock doors are in use, Aluf shall insure that a weatherproof seal is in place. Aluf shall post signs near loading dock doors stating that loading dock doors must be closed when not in use.

Other material handling doors shall be equipped with plastic weather curtains.

4. Repro Carbon Bed Sampling: Aluf Plastics shall sample the carbon contained in the carbon bed associated with the Repro stack every three months in order ensure that breakthrough has not occurred and to determine an appropriate replacement schedule for the carbon bed.

Proposed modification to Permit Condition 2, Item 2.2 (modification in **bold** below):

Aluf Plastics shall operate and maintain the particulate removal systems and carbon adsorption units in accordance with good engineering practice and engineering specification. **Particulate removal systems and carbon adsorption units, including in-line carbon filters and in-line HEPA filters, shall be inspected weekly and exchanged as needed in accordance with good engineering practice and engineering specifications.** Breakthrough of the carbon adsorption units shall be avoided....