

Town of Orangetown

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Andrew Y. Stewart, Ph.D.
Supervisor

November 16, 2016

Mr. George Sweikert
NYS Department of Environmental Conservation
21 S. Putt Corners
New Platz, NY 12561

Re: Comments on proposed Scope of Investigation - Air
Emission Controls at ALUF Plastics, 2 Glenshaw Road,
Orangeburg, NY, dated October 21, 2016

On behalf of the Town of Orangetown, I am submitting these comments on the scoping document referenced above. These comments have been generated from both our town engineers and our engaged community of victims of Aluf's odor emissions. I hope they are useful to our shared goal of eliminating, not just "improving," the nuisance odor emissions, and reducing the risk of any health effects from the chemicals generating these odors.

I trust the Town will have a similar opportunity to review the final scoping document prior to DEC approval, and, once the DEC receives the engineering recommendations that are due on January 21, 2017, the town will have the opportunity to review these recommendations prior to DEC approval as well. I thank you for including the Town in this review process.

Aluf has a history of dragging its feet on odor control investments while expanding its operations greatly, and this history has been harmful to the quality of life and peace of mind of our community. The town has Aluf in court, and coming to the Zoning Board for a full review of performance standards, and we appreciate the important role and authority the NYS DEC also has in this matter. We implore you to use this opportunity to demand Aluf install state-of-the-art, comprehensive odor control technologies and operational processes, and make sure they work right. Please put in place a method for verifying not just the installation of these systems, but their correct maintenance and operation and, most importantly, verifying that they have their intended effect of eliminating the odor problem in our community, not just "improving" the odor control system. The actual improvement needs to eliminate nuisance odors from Aluf in the vicinity, and this outcome must be subject to scientific verification. I rely

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on your superior expertise to help us meet this standard and put the odor problem behind us once and for all.

Once again, thank you for your work on this important community issue,

Sincerely,

Andy Stewart,
Orangetown Supervisor

cc: Town Board
Town Zoning Board of Appeals
John Giardiello, Director Orangetown OBZPAE
Clean Air for Orangetown

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MEMORANDUM

TO: GEORGE SWEIKERT, NYS DEC
FROM: ANDY STEWART, SUPERVISOR
SUBJECT: COMMENTS ON PROPOSED SCOPE OF INVESTIGATION - AIR EMISSION CONTROLS AT ALUF PLASTICS, 2 GLENSHAW ROAD, ORANGEBURG, NY, DATED OCTOBER 21, 2016
DATE: SEPTEMBER 13, 2016
CC: TOWN BOARD; TOWN ZONING BOARD OF APPEALS; JOHN GIARDIELLO, DIRECTOR, OBZPAE; CLEAN AIR FOR ORANGETOWN

Please incorporate the following comments into DEC's final Scope of Investigation:

1. Describe in detail the manufacturing process; list all equipment/technology required for manufacturing; identify which are involved in odor creation/odor control and how.
 - a. Include room/plant ventilation systems
 - b. Identify opportunities where air/odors/gases/fumes are not captured by odor-control systems
2. Provide review and evaluation of existing maintenance records to insure compliance manufacturers recommendations for the processes systems and emission control systems Define and document proper maintenance routine – visual inspection is not sufficient. Verify that Aluf is, for example, buying replacement carbon filter media at a rate that makes sense for the effective functioning of this system.
3. Provide a full analysis of the chemistry of the manufacturing process to verify that odor and emission control systems are adequate to any existing, experimental or innovative chemistry that may exist either at Aluf or in the manufacture of the pellets and post-industrial waste plastic Aluf uses to make their bags. Thus, analysis should extend to the source material, and the chemistry of the production process, and for example, identify any nanotechnology or other factors that may not be susceptible to odor and emission control technologies commonly used in the plastic bag manufacturing industry.
4. Describe the work process and how various odor-control processes are integrated, and identify any gaps.
 - a. Specifically address this regarding plant start-up/shut-down

- b. Define and require sufficient redundancies
5. Include an analysis of the odor complaints received from the community to show where patterns may exist.
6. Require air quality testing by a third party and paid for by Aluf, to verify effectiveness of upgrades of:
 - a. Ambient indoor air, stack emissions, and ambient air around Aluf should be tested now to create a baseline, both during operating and non-operation periods, and then after the work is complete for odors, individual VOC's and total VOC's.
 - b. Testing should be done on several occasions establishing a proper perimeter of sampling locations so that no matter the wind direction, an accurate downwind reading can be taken along with upwind readings. For accuracy the samples should be taken with a light and steady wind or no wind at all and they should also be taken both when the plant is known to be in operation and the odor is present and also when the plant is known to not be operation.
 - c. Monitoring equipment should be calibrated with accuracy to 1 ppb
 - d. Require soil samples from around the facility, inside and outside the plant fence line, for testing as well.
7. Define the number of extruders or **extrusion units/lines** and all other odor-causing machines in the DEC permit and ensure there is a plan to expand odor control should the plant expand in the future.
8. Fumes/gases/ odors must be captured and treated at their source. A secondary air recovery system with its own treatment system should also be employed for general ventilation and to capture any fumes not contained in the primary system. Adding modularity to the design would make it expandable as necessary. In addition, the secondary system shall be used so that control of odors will be maintained if the primary system shall fail.
9. Any leaking section of duct system must be thoroughly sealed and if deemed necessary, replaced and completely upgraded.
10. Provide for a permanent means of filing and addressing complaints
11. Define and provide for a permanent means of an air sampling program.