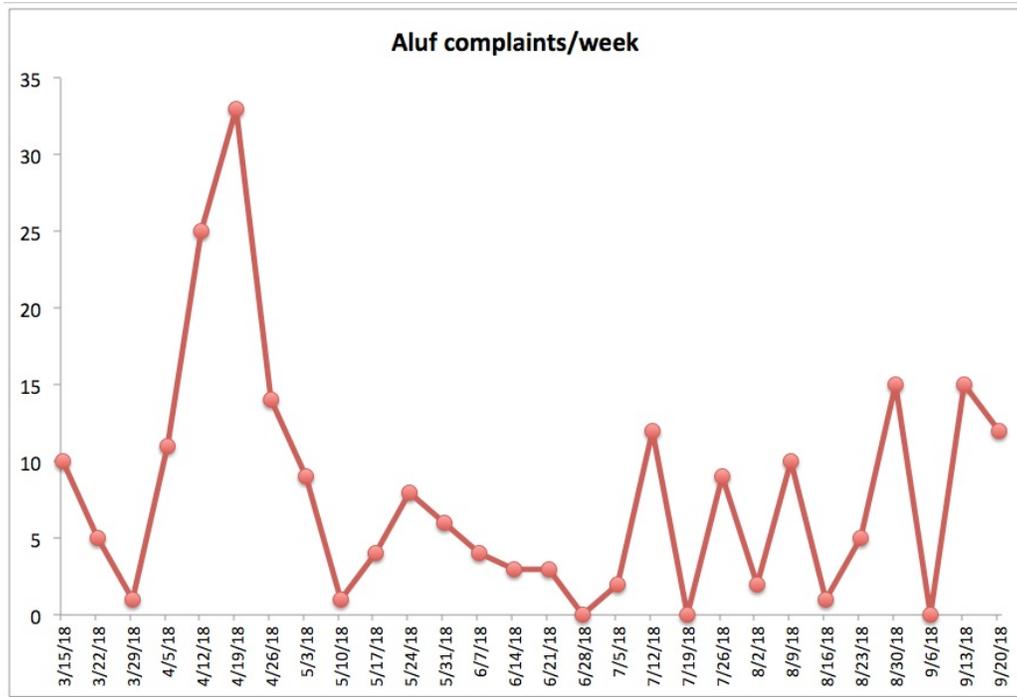


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Odors in the area around Aluf Plastics, though down from previous highs, continue to be a periodic issue for nearby residents. The below chart, prepared by our Air Quality Review Committee, shows the total number of air quality complaints (excluding unrelated ones or different geographies) by week:



As one can see, there appears to generally be two week intervals between increases in odor reporting. This appears to correlate with the two week interval mandated for scheduled replacement of Aluf's carbon filters. We have brought this possible correlation to the attention of the NYS Department of Environmental Conservation (NYSDEC), and though they have verified that Aluf is complying with the schedule and not simply being reactive to odor reports, they are looking into the possibility that the current carbon filter replacement schedule might be slightly too long, thereby resulting in decreased effectiveness towards the end of the two week cycle.

On September 21, 2018, in response to the continued issues, the NYSDEC conducted a site inspection, and were also accompanied by the Town's new Public Health Engineer.

As part of the inspection, DEC staff walked the Rail Trail, and observed conditions along Western Highway to St. Catherine's, and visited the areas close to the high school, elementary school and the Atchison and Sullivan residences. During the inspection, DEC staff did not detect any odors in the area surrounding the Aluf facility or at the specific locations noted above. The wind direction at the time of the inspection was out of the North in morning, and at noon changed to out of the South.

While the NYSDEC states that the number of odor complaints have significantly decreased since they began their investigation of this issue and have required Aluf to implement more obvious measures to reduce odors, they have continued to work to identify specific upset conditions that may lead to

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continuing odors in the community. Some of these conditions include extruder temperatures, use of ink on the plastic bags, filters and maximizing the use of the blowers.

During the inspection of the Aluf Facility, NYSDEC staff documented the following observations:

1. The temperature for the extruders has not exceeded the limit of 500 degrees F. This lower temperature helps to reduce odors from the facility;
2. DEC has also identified that the inks used on the recycled plastic bags could lead to odors, and have required that Aluf limit the percentage of ink coverage. DEC will continue to investigate whether this percentage needs to be further reduced;
3. During the inspection, NYSDEC reviewed Aluf's HEPA filter and carbon filter logs, and found that Aluf has been replacing the filters on schedule, every 2 weeks. NYSDEC staff also inspected for breakthrough of carbon filters, and did not observe any breakthroughs; and
4. All boosters and blowers were working properly. However, NYSDEC staff requested that Aluf increase the booster blower to its maximum capacity in order to increase velocity in the stack and provide for better dispersion. This will also help to minimize odors in the surrounding community.

Finally, in terms of NYSDEC's actions, last month NYSDEC staff requested that Aluf sample the carbon bed. This sampling will help the NYSDEC determine the integrity of the carbon bed. After our review of the sample results, the NYSDEC will determine appropriate next steps at their level, and the Town will remain in constant contact with them.

Moving on to the status of other items related to this issue, our Public Health Engineer is currently working and embedding himself in the process while learning the specifics of the job and situation. He has visited Aluf several times already, and is working towards completion of his NYS required Code Enforcement Official training, which will allow him to write citations. This course begins in October and takes six months to complete. Though in the interim he can observe and assist, once this course is completed he will actually be able to enforce the code and issue violations.

The Public Health Engineer and two code enforcers will be conducting the required training in our new olfactometers, and are expected to have the training complete by the end of this week. This will allow the Public Health Engineer to properly document odors in relation to our newly adopted Town Code for odors, and will allow our code enforcers to enforce as necessary. Until he is a Code Enforcer, the Public Health Engineer cannot write citations himself, but he can swear out his observations using this technology and pass them on to a Building Inspector or Code Enforcer, who can then write the actual citation, and this is a method we will employ going forward.

Meanwhile, the newly hired consulting engineer, who is tasked by the Town and by the ZBA with reviewing the current odor control system at Aluf and what can and must be done to get odors below a nuisance level, will be in the Building Department next week to review all of the substantial amount of background documents on Aluf, and will then offer feedback, analysis, ask for additional information if needed, and recommend changes to their system in order to address the odor issues identified by the TRC report.

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Sadly, but I suppose unsurprisingly, Aluf, after sending in July a list of changes being considered to address the actual nuisance odor issue identified in the TRC report on a voluntary basis, chose to instead submit a re-analysis of the TRC report using their own consultant to “prove” that they are already in compliance based on the current system.

Fortunately, this has resulted in no lost time – the process for hiring the needed engineering firm was just completed, and they are now on board and ready to provide the needed analysis and required changes that Aluf will have to make.

Unfortunately, this means that the compliance will need to be forced, and Aluf and the Town will now likely be facing continued back and forth in court and before the ZBA in order to get the eventual changes put into place. Disappointing indeed, but we are now armed with the tools needed in the enforcement, personnel, and expert end to ensure that this issue is finally and completely dealt with. The current pattern of upticks in complaints every two weeks will not be allowed to continue, and the odor control system will be sufficient per our Town code and performance standards, period.