



Seneca County
Health Department

Health and Senior Services Building
2465 Bonadent Drive, Suite 3
Waterloo, NY 13165

Scott King
Public Health Director
sking@co.seneca.ny.us



Phone: 315-539-1920
Fax: 315-539-9493

www.senecacountyhealthdepartment.com

May 20, 2022

Bill Lutz, President
Waterloo Container
2311 State Route 414
Waterloo, NY 13165

Re: Sewer Odor Complaint

Dear Mr. Lutz:

Thank you for bringing the issue regarding sewer odors at Waterloo Container Co. (and the immediate vicinity) to our attention with your letter of May 4, 2022. In keeping with our obligations under Public Health Law, our office initiated an investigation of this alleged public health nuisance following receipt of your correspondence. The intent of this letter is to update you as to the status of this investigation.

Up to this point this investigation has included the following:

- Visits by a Public Health Sanitarian to several locations that are connected to the sewer line that serves the area in question.
- Discussions with representatives from the Town of Seneca Falls Water and Sewer Operations Department.
- Discussions with engineers from Barton & Loguidice (B&L) who are contracted by the Town of Seneca Falls to provide consulting services related to water and sewer issues.
- Consultation with representatives from the NYS Department of Health (NYSDOH) and NYS Department of Environmental Conservation (NYSDEC).
- Discussions with Seneca County Code Enforcement; and consultation with the Seneca County Board of Health.

While final results of this investigation are pending, we did confirm your allegation that sewer odors were at least occasionally present inside several locations that are connected to the municipal sewer line that serves Waterloo Container Company during the period late April to early May 2022.

10.01.2021

To achieve healthy communities and safe environments for all.



Public Health
Prevent. Promote. Protect.
Seneca County NY



Seneca County Health Department

Health and Senior Services Building
2465 Bonadent Drive, Suite 3
Waterloo, NY 13165

Scott King
Public Health Director
sking@co.seneca.ny.us



Phone: 315-539-1920
Fax: 315-539-9493

www.senecacountyhealthdepartment.com

Initial confirmation of the odor intrusions was quickly obtained through information sharing by the Town of Seneca Falls, and it should be noted that the town, as well as B&L, have been cooperative with this investigation from the outset.

Your letter of May 4 also expressed concerns about the potential health effects of the sewer odors, and these concerns were reiterated during a subsequent call with Mr. Mark Pitifer. We have no means to determine what exposure levels employees of Waterloo Container Company may have experienced during the recent occurrences of sewer odors entering the facility. However, the NYSDOH, as well as readily available literature on sewer gas, indicate that hydrogen sulfide gas is a natural component of waste disposal and is typically present in municipal sanitary sewers. This gas could have been the cause of the symptoms that were reportedly experienced by your employees during the recent odor intrusions. Should the sewer odors recur inside your facility we would recommend that you immediately remove all personnel from the affected area for the duration of the event, and that you report the event to the Town of Seneca Falls Water and Sewer Department. Further, you might also consider increasing the fresh air flow within the affected space, and advise any employees experiencing acute or worsening symptoms to seek prompt medical attention. For your information I have included the NYSDOH *Hydrogen Sulfide Chemical Information Sheet* with this letter.

An additional health concern expressed in your letter related to the potential for PFAS (Per- and polyfluoroalkyl substances) to enter your facility along with the sewer odors. While the Seneca Meadows Landfill is regulated and or permitted by the U.S. Environmental Protection Agency (EPA), the NYSDEC, the Town of Seneca Falls, and the Occupational Safety and Health Administration (OSHA), and not by the Seneca County Health Department, it is my understanding from information obtained during this investigation that Seneca Meadows, Inc. (SMI) is permitted to discharge treated leachate into the sewer line that serves Waterloo Container Company. While this office has no information indicating that PFAS was present in the leachate at the time of the odor intrusions, from our discussions with the NYSDOH and from information available to this office regarding PFAS it is considered unlikely that the sewer odors would have presented a significant exposure pathway for PFAS were it present at the time of the sewer odor intrusions. The most common exposure pathways for this group of chemicals are outlined in the enclosed FAQ obtained from the NYSDOH, and includes consumption of contaminated drinking water. Please note that the public drinking water systems in Seneca County, including those serving the Town of Seneca Falls and Village of Waterloo, are required to routinely monitor for the presence of these chemicals. To date, there have been no exceedances of the maximum contaminant levels for PFAS set by the NYSDOH in any public water supply system within Seneca County.

While our office continues to monitor this situation, we encourage you to have a professional plumbing service evaluate your facility's wastewater plumbing so as to be certain that there are no internal issues that might allow sewer gas to enter the facility. Please note that Seneca County has initiated a review of recent permits and

10.01.2021

To achieve healthy communities and safe environments for all.



Public Health
Prevent. Promote. Protect.
Seneca County, NY



Seneca County
Health Department

Health and Senior Services Building
2465 Bonadent Drive, Suite 3
Waterloo, NY 13165

Scott King
Public Health Director
sking@co.seneca.ny.us



Phone: 315-539-1920
Fax: 315-539-9493

www.senecacountyhealthdepartment.com

corresponding inspections for buildings that are connected to the sewer line in question in order to assess compliance with applicable sections of the Plumbing Code of New York State.

Going forward, I am confident that the various parties involved in this sewer gas intrusion issue will continue to seek a long-term resolution, and we will continue to monitor developments and progress towards achieving this goal while keeping you updated. Should you have any questions or concerns regarding this matter please do not hesitate to contact me at this office.

Very truly yours,

Scott King
Director of Public Health

Don Trout, Chair of Public Works Standing Committee, Seneca County
David Ettman, Seneca County Attorney
C. Mitchell Rowe, Seneca County Manager

