



sanitation

JOHN J. DOHERTY

Commissioner

125 Worth Street, Room 720
New York, New York 10013
Telephone (646) 885-4974
Fax (212) 385-2560

April 12, 2004

Honorable Gifford E. Miller
Speaker, New York City Council
City Hall
New York, New York 10007

Honorable Michael E. McMahon
Chair, Committee on Sanitation and
Solid Waste Management
New York City Council
250 Broadway – 14th Floor
New York, New York 10007

Dear Speaker Miller and Chairman McMahon:

I am pleased to present the Consolidated Executive Summaries of the New York City Department of Sanitation Commercial Waste Management Study, prepared by a consultant as required by Local Law 74 of 2000. This Study, which examines how commercial waste in the City is managed, is one part of the Department's larger commercial waste planning and policy initiatives that will unfold over the course of this year. The complete Study will be sent to you shortly.

Local Law 74 established the goals of this Study. The first was to assess potential environmental and public health impacts on communities in which a number of privately owned solid waste transfer stations are located. The second was to provide a foundation for the Department's efforts to develop a new Comprehensive Solid Waste Management Plan (SWMP).

As part of achieving the Study's first goal, three separate evaluations were conducted after a public scoping process had been completed. The first identified four areas of the City with geographically proximate, privately owned transfer stations (Hunts Point and Port Morris in the Bronx; East Williamsburg/ Newton Creek area of Brooklyn; and, Jamaica, Queens), and evaluated the potential overlapping impacts to the environment (air quality, odor, noise, traffic, water quality, public health). The second evaluation surveyed over half of the commercial waste transfer stations in these Study Areas, in order to identify any operational measures and design modifications to improve the environmental performance of these facilities. The third evaluation assessed the effectiveness of current permitting and enforcement activities of City and State agencies that oversee transfer station operations, under existing rules and regulations.

The Department's transfer station enforcement staff has doubled since 2000, and the Department is committed to ensuring that transfer stations comply with all applicable regulatory requirements. The number of transfer station facilities in the City has declined from 153 in 1990 to 62 today, including 7

www.nyc.gov/sanitation

KEEP NYC CLEAN



REDUCE, REUSE, RECYCLE



DON'T LITTER



printed on recycled paper

facilities with multiple permits. Of these, 22 are permitted to receive putrescible waste, while the others receive construction and demolition debris or clean fill material.

The Study recommends practical and effective design and operational improvements which, together with continued strong enforcement efforts, will lead to even better regulatory compliance and improved environmental performance at privately owned transfer stations in the City. The Department welcomes these recommendations and, as necessary, will move forward quickly, through a public rule-making process, to amend its regulations governing transfer stations. These more stringent design and operations regulations will apply not only to new transfer stations, but also to existing transfer stations, many of which will need to comply by retrofitting their facilities and upgrading their operations.

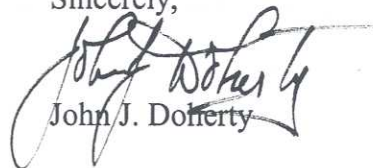
The findings of the Study will also help inform the Department's new transfer station siting regulations. The 1998 siting regulations imposed certain new restrictions on the locations in which transfer stations could be sited. The Department will promulgate new siting rules this summer, and will provide opportunity for public comment from communities, the regulated transfer station industry, and other interested parties.

The second goal of the Study was to help the City to assess and plan for management of both the residential and commercial waste streams in an efficient manner through the development of the new SWMP. The SWMP will set forth the Department's plans for managing solid waste generated in the City over the next 20 years. The Study provides useful data and an effective context for considering how the residential and commercial waste management systems might operate more effectively.

For example, the Study provides an estimate of the capacity at the Department's converted Marine Transfer Stations (MTSs) that is potentially available for commercial waste. However, the Study does not address the business arrangements or possible regulatory policies that would be necessary elements of a City policy to handle commercial waste at the converted MTSs. These will be important considerations for future study and analysis.

Other valuable Study data includes the quantities of commercial waste generated in the City today and projections of commercial waste generation rates in the City over the next 20 years. Waste disposal capacity at landfills available to the City by truck or rail over the next 20 years is also analyzed. The Department expects to present the draft SWMP to the Council in September. The Commercial Waste Management Study makes an important contribution to the City's ongoing planning efforts and evolving understanding of solid waste management strategies and alternatives. The Department is pleased to make the Study available to the Council and the interested public.

Sincerely,



John J. Doherty