

Southwest Brooklyn Comments

First Name	Last Name	On Behalf of	Type of Comment
William	Colton		Letter
Ken	Diamondstone	BSWAB	Letter
Howard	Feuer	Jerry Gagliano	Letter(s)
Jerry	Gagliano		Comment Sheet
Carol Libby	Hart		Testimony
Deborah	Masters	Environmental Protection Committee	Letter
Rochelle	Stella		Testimony



WILLIAM A. COLTON  
47<sup>th</sup> Assembly District  
Kings County

THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

VICE CHAIR  
Majority Conference

CHAIR  
Legislative Commission on  
Solid Waste Management

COMMITTEES  
Corrections  
Environmental Conservation  
Governmental Employees  
Labor  
Ways and Means

June 10, 2004

Harry Szarpanski  
Assistant Commissioner  
New York City Department of Sanitation  
44 Beaver Street, 12<sup>th</sup> Floor  
New York, New York 10004

Dear Commissioner Szarpanski:

I have received the Revised Notice of Public Scoping Meeting regarding plans for the Southwest Brooklyn Marine Transfer Station.

I am disappointed that this meeting is set for June 17<sup>th</sup>, 2004 at Shallow Intermediate School, which is a considerable distance from the Southwest Brooklyn site. I would have hoped Cavallero Junior High at Cropsey and 24<sup>th</sup> Avenues or even Seth Low Intermediate School at Avenue P and West 11<sup>th</sup> Street would have been more convenient to the affected community.

There are many questions which community members will have regarding this project including the current status of the demolition of the Southwest Brooklyn Incinerator. Also of concern will be the projected number of truck loads in relation to the number dropping loads prior to the closing of Fresh Kills and what community Planning boards will be serviced by the new Southwest Brooklyn Marine Transfer Station. Also there will be concerns of noise levels.

My review of the proposed new Comprehensive Solid Waste Management Plan indicates cranes will be used in conjunction with the containerization unit to be built and that the transporting of solid waste will be by barge or rail rather than trucking. This is a positive step.

I am still concerned that the best way to avoid excessive disposal costs is to maximize the three "R's" of reusing, reducing and recycling as much solid waste as possible.

I look forward to further information regarding the Comprehensive Plan and the Southwest Brooklyn Marine Transfer Station site, in particular, as the SEQRA process unfolds.

Please keep me informed of the details of these plans.

Very truly yours,

William Colton  
Member of the Assembly, 47th AD

# Fax Cover Sheet

July 11, 2004

From: **Ken Diamondstone,**  
Chair, Brooklyn Solid Waste Advisory Board

To: **Harry, Szarpanski,**  
Assistant Commissioner, Department of Sanitation NY (DSNY)

If you have any problems receiving this fax, please call 718-624-6822.

# of pages including Cover Sheet: 6

Sent to fax # 212-269-0788

My name is Ken Diamondstone and on behalf of the Brooklyn Solid Waste Advisory Board, of which I am Chair, I am submitting our supplementary testimony regarding the Draft Scoping Document for the City of New York Comprehensive Solid Waste Management Plan DEIS

### OVERVIEW

The Scoping Document for the new SWMP states on page 1 that it "will define the City's Goals and Objectives... and will describe the major new programs that will be implemented to supplement existing successful City programs..." The Brooklyn SWAB submits that the Scoping Document outlines a set of actions and alternatives that are diminimus as opposed to comprehensive with regard to goals and objectives and in outlining major new programs

Conceptually the SWAB strongly endorses the proposed SWMP objective of exporting all residual waste (waste materials not recycled, composted or disposed of in other fashions) by rail and or barge in lieu of export by truck.

We support plans to retrofit existing municipally owned marine transfer stations as a City wide undertaking that distributes burdens associated with retrofitted MTS' equitably among Boroughs and communities.

We support retrofitting MTS with containerization capacity or alternatively, containerization at an EBUF, if that proves cost effective and environmentally less burdensome than containerization at the MTS. However we contend that the proposed action facilitating Long Term Export should be just one among many others; that export of Municipal solid waste must be accompanied by a host of other objectives, which only in combination form a Comprehensive SWMP.

The Brooklyn SWAB contends that the scope of actions and the environmental impacts are a near repeat of earlier SWMP versions except for the important revision of establishing new long-term export modalities.

Because this vision presents such a limited focus, it short changes all New Yorkers. It lacks innovation, has glaring omissions and misses the opportunity for NYC to use its SWMP to become an urban leader in environmental stewardship in a cost effective manner and to simultaneously achieve its other solid waste goals.

There is only lip service given to preventing waste and waste reduction programs.

There is no plan of actions or alternatives to divert more municipal waste into the recycling stream at a cost per ton now far less than the contracted costs for exported waste (even accounting for DSNY productivity costs which are higher for recycling collections). The Scoping Document should quantify the environmental implications of adding materials such as fibers and yard waste to our recyclables.

Nor is there reference to proposed actions that might move NYC towards Zero Waste, a goal that if achieved even in part would reduce the need to export materials to landfills. While the goal of zero waste may appear as an impossible objective, treating it as such becomes a self-fulfilling

In the current scope, there is no analysis of the environmental impacts of the 20 year contracts between DSNY and private haulers. These contracts may contain clauses guaranteeing specific tonnages for export or a guaranteed percentage of the municipal waste stream for export. If such clauses exist, wouldn't they create strong disincentives to expanded recycling, to examining new technologies which might produce energy, or other actions which lead towards zero waste (and all of which reduce available tonnages for export).

### Environmental Justice Concerns

The Environmental Justice designated communities of Greenpoint / Williamsburg are at the very epicenter of all of NYC solid waste activity; Municipal putrescible, commercial putrescible, C & D and every type of recyclables are in some way processed here. The new SWMP will either alleviate the current untenable burden borne by these communities or exacerbate that burden. The Brooklyn SWAB join these constituents in saying they should not be required to accept this burden for another 20 years and in fact urgently need relief. If ever there was a need for Environmental Justice, it is in Greenpoint / Williamsburg and the need is now.

The Environmental Justice Attachment of this Scoping Document defines Environmental Justice on page 3 of CP-29. "Environmental Justice means the fair treatment and meaningful involvement of all people regardless of race, color or income with respect to the development, implementation and enforcement of environmental Laws, Regulations, and Policies." To date, these communities have never been afforded those lofty rights.

Laws 1. Environmental Laws regarding the siting and operations of waste transfer station remains unenforced by DEC and DOS to this day.

Regulations 2. Regulations established to authorize the issuance of permits for waste facilities are routinely ignored by DEC and DOS. Who can forget the building of the Eastern Environmental transfer station under the nose of DSNY and DEC without permit, in total illegality and without a peep from the government regulators?

Policies 3. No one consulted these communities when another Mayor decided to close Fresh Kills without a plan to replace it and then settled on policies without serious community input. This later became known as the "interim plan" but in fact was no plan at all, except that it created and expanded the land based transfer system in Greenpoint / Williamsburg totally ignoring the terrible environmental consequences it created as a result of these policies.

But the Environmental Justice Policy definition goes further in its second sentence. It declares that Environmental Justice means "no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal and commercial operations... or the execution of Federal, State... (and) local policies."

It is in adherence to this Environmental justice section, that the SWMP, through its proposed actions, alternatives and mitigations has an opportunity to insure that no further damage be done in Greenpoint and Williamsburg and other Environmental Justice neighborhoods and to reverse past Environmental Injustice.

prophecy. The exclusion of a zero waste goal and initial actions to begin moving NYC toward that goal as part of the SWMP scope and DEIS is a disturbing omission.

When initially conceived, a primary reason for barge, rail or barge to rail export in lieu of truck export was environmental. Polluting, smelly, infrastructure destroying, traffic generating and quality of life diminishing trucks would be replaced by this more environmentally benign and cost effective system.

Yet the Scoping Document on page 5 distorts the City's original objective of reducing environmental impacts on burdened communities by simply defining the goal of barge and rail as cost issues ignoring the environmental one. This is significant only in that it sets the tone and context of the planned long term export actions as simply reaching "remote disposal facilities because nearby landfill capacity is depleting while remote capacity is not" ... "remote capacity is not economically accessible by truck-based transfer and reliance on truck transport has resulted in an average increase of 19% over the initial bid price." That limited context of excluding environmental goals as a municipal objective is shortsighted and should be modified.

Further, the proposed action to facilitate long term export has no contingency back up strategy. Just as an earlier SWMP posited an ERUF in Linden NJ which never materialized and therefore left NYC with only interim stop gaps, so too the day may come when recipient States cap or cut off access to their landfills if not in actuality, then through massive surcharges. The Draft Scoping Document analyses no contingency plans and sets forth no alternatives for this not so far fetched eventuality that could create a crisis of monumental proportions. This is a serious omission in the Scoping Document roster of actions and alternatives that should be included in the SWMP.

The initial impetus and authority for implementing a SWMP comes from the NYS Environmental Conservation Law which requires that a "plan must take into account the objectives of the State's solid waste management policy set forth in Section 27-0106..." provide for the management of solid waste within the planning unit (NYC) for at least 10 years", but also "must employ sound principles of Natural Resource Conservation, Energy Production and Employment Creating Opportunities."

To comply, the Draft Scoping Document should include proposed actions and alternatives to be evaluated in the DEIS under several new chapter headings.

There should be a chapter on Natural Resource Conservation with associated DEIS analysis which outlines a 20 year plan for waste reduction actions, expanded recycling, "zero waste" actions and augmented material reuse programs. It could incorporate Employment Creating Opportunities by proposing green industrial park(s) and reuse depots. It would also identify, in concert with the successful recycling bidder, ways to utilize NYC municipal waste as a natural resource for food stock in the manufacture of various new or established products with recycled content and the new jobs that would result from manufacture of these products.

The chapter on Energy Production should address all new technologies with waste to energy potential that are or may be both environmentally benign and cost effective including but not limited to anaerobic digestion, bio-diesel fuels and various gasification options.

## ENVIRONMENTAL JUSTICE METHODOLOGY AND ISSUES

1. The objectives and policies of Environmental justice cannot be attained if the primary study area of one-quarter mile excludes most of the people in designated environmental justice communities. Proximity of the proposed action and alternatives to the environmental justice census tracts most significantly in the Greenpoint / Williamsburg but also at Hamilton Avenue and South West Brooklyn should be taken as a mandate to test every impact throughout these designated environmental justice areas.
2. The existence of a disproportionate share of environment impact must be determined by combining impacts from industrial municipal and commercial operations. It seems clear from the Environmental Justice Attachment that the policy regarding Environmental justice is referring to the totality of impacts, not to separate discrete ones from various sources. This means in our view that the Draft Scoping Document needs to evaluate not just new impacts from the MTS but whether an additional new layer of impact resulting from the proposed action combined with the existing ones, results in environmental justice community's suffering a disproportionate share of impacts.
- 3 In environmental justice communities, it is imperative that environmental justice drive the testing methodology used, not some predetermined textbook formula that skirts the essence of environmental justice policy.
4. Page 9 of the Scope outlines the first 3 alternatives to retrofitting the municipal Greenpoint MTS. They required private proposers to retrofit and expand (if necessary) their own existing transfer stations or create a new one(s). under these scenarios, expansion of existing capacity or creation of new capacity required capacity offsets (reductions) elsewhere in Greenpoint / Williamsburg. This we support. However unless a prohibition against using currently fallow (unused) capacity is added to alternatives 1,2 and 3, the result could be capacity offset but a total increase in overall waste tonnage processed in Greenpoint, Williamsburg. Offsets in capacity in alternatives 1,2, and 3 must be matched by ironclad controls on overall tonnage throughputs. By the same token, similar protection should be put in place if the proposed action (the retrofitting of the existing MTS takes place). No assumption can be made that diverting tonnage from private land based facilities to the MTS will automatically result in an equivalent tonnage throughput reduction at the private facilities. New sources of waste may be found from out of the city or from neighboring states to be processed if unused capacity is aloud to be reactivated. With scoping documents should evaluate any potential for adverse impact associated with the lack of guarantee reduction of throughput at existing land based transfer station in the environmental justice census tracts under both proposed action and alternatives 1, 2, and 3.
5. The footnote in table 2.2-4 in section 2.2.13 Traffic and Transportation outlines the formula used in the Scoping Document to convert NYC sanitation trucks into PCEs (passenger car equivalents). This equation is most likely derived from the 2000 Highway Capacity Methodology and results in a ratio of 1 truck = 1 ½ cars. Common sense however leads to a much higher conversion formula since DSNY truck impacts are experienced primarily on local streets, not on highways. DSNY sanitation trucks have what we call "avoidance impacts" on other adjacent vehicles that may significantly add to the trucks traffic congestion impacts and thereby exceed the one and a half passenger car equivalent. Cars dropped back further from sanitation trucks than from cars to avoid odor, danger of an obstructed view and apprehension

about unanticipated movements. Cars directly behind DSNY trucks frequently change lanes to escape the above items creating additional traffic impacts even when DSNY trucks are in transit. These and other variables should be quantified and would likely add considerably to DSNY truck PCE.

6. The decision to not address traffic impacts on Saturdays because of lower background traffic, especially at Southwest Brooklyn MTS has been addressed in testimony by Brooklyn SWAB co-chair Nancy Walby. We reiterate the request for Saturday traffic study and add the Hamilton Avenue and Greenpoint MTS to that request. Saturday traffic is much more a function of shopping, recreation or tourism on Saturdays but no less affected by additional sanitation trucks.
  7. On page 66 section 2.2.12.3 Sanitary Sewers and Storm Waste, the SWAB is concerned with the limits of testing at water pollution control plants especially the one adjacent to the Greenpoint MTS. Problems may not be evident under dry weather condition or by averaging monthly levels. Testing should be done during heavy rains and high volume usage when the WPCPs are under stress and storm water runoff is highest.
  8. On page 75 section 2.2.13.4, Traffic and Transportation Typical Mitigation Measures, the Brooklyn SWAB questions what is meant by "acceptable levels" especially as it relates to higher impacted environmental justice communities. The last sentence in this section is so open ended as to be meaningless. The Brooklyn SWAB seeks stronger assurances in this mitigation section insuring that Greenpoint Williamsburg communities, designated as environmental censes tracts and currently baring the brunt of processing most of NYC garbage not be further impacted because of high "relative cost of mitigation and the ease (or lack thereof) of implementation" which may be difficult. No new traffic impact should be imposed on Environmental Justice areas.
  9. In the 2.2.14 section on air quality, we note that "the analysis will add existing background concentrations to projected converted MTS impacts" for various air pollutants. We have long sought for DSNY testing of background "cumulative" impacts and to establish "acceptable attainment levels" for all of their impacts not only for air quality, but also for odor, noise, public health and traffic/transportation and urge the addition of same to the scope of study.
  10. We note that for "air quality" there is no section relating to mitigations and seek the inclusion of same.
  11. Throughout the air quality section, no reference is made to DSNY truck emissions as a function of fuels used. Such a study of impacts of various fuels including conversion of DSNY trucks to natural gas, hydrogen or hybrid vehicles should be added as an element of air pollution.
- We thank you for this opportunity to submit testimony.

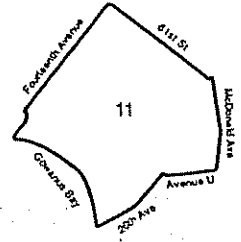


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Fax (718) 266-8821



WILLIAM R. GUARINELLO  
*Chairman*

THE CITY OF NEW YORK  
COMMUNITY BOARD No. 11  
2214 BATH AVENUE  
BROOKLYN, NEW YORK 11214



HOWARD FEUER  
*District Manager*

June 7, 2004

Commissioner John Doherty  
Department of Sanitation  
125 Worth Street  
New York, New York 10013

Dear Commissioner Doherty:

On June 4, 2003, I had the opportunity to meet with Mr. Walter A. Czwartacky, Director of Special Projects, Assistant Commissioner Szarpanski and Mr. Jerry Gagliano the owner of Marine Basin Marina, located at 1900 Shore Parkway, regarding an issue which might develop with the re-opening of the Southwest Brooklyn Marine Transfer Station Waste Containerization Facility. I arranged this meeting early in the process so that the Department of Sanitation can have ample time to address this potential problem.

Community Board 11 fully supports the Department of Sanitation's initiative to remove the thousands of trucks which transport waste throughout our communities.

The issue that we discussed at the June meeting was the impact caused to Mr. Gagliano's property by the wake that will be generated by tug boats entering and leaving the facility.

At this meeting, we discussed Mr. Gagliano's concerns regarding his retaining wall and we were promised that a study would be initiated to determine the impact to this abutting property owner. The retaining wall in question protects his property and the property of others who utilizes this marina.

At the meeting of Community Board 11 held on May 20<sup>th</sup>, 2004, the Board unanimously RESOLVED that:

"The Department of Sanitation conducts a study to determine the impact on the Marine Basin Marina due to the increased wake that will be generated by the Southwest Brooklyn Marine Transfer Station."

e-mail: [info@brooklyncb11.org](mailto:info@brooklyncb11.org)

[www.brooklyncb11.org](http://www.brooklyncb11.org)

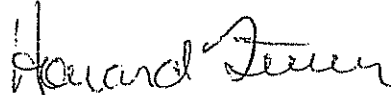
Commissioner Doherty  
June 7, 2004  
Page 2

Community Board 11 adopted this resolution because a year has passed and no information has been forthcoming. The Board has recently received the new Draft Permit application and has nothing pertaining to Mr. Gagliano's concerns and the possible negative impacts that it may have on his property.

Community Board 11 did not bring a long list of questions regarding the new Marine Transfer Station. However, this Marina's concern seems reasonable and we respectfully request that you hold off any movement on this project until an impact study can be completed.

Thank you for your prompt attention to this matter.

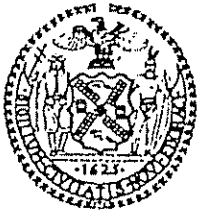
Sincerely,

A handwritten signature in cursive script that reads "Howard Feuer".

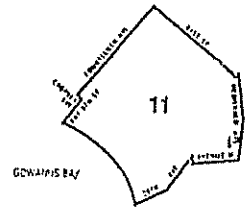
Howard Feuer  
District Manager

Cc: . Walter A. Czwartacky, Director Special Projects  
Assistant Commissioner Szarpanski  
Councilman Dominic M. Recchia Jr.  
Sarah Dolinar, Director Environmental Review





THE CITY OF NEW YORK  
COMMUNITY BOARD No. 11  
2214 BATH AVENUE  
BROOKLYN, NEW YORK 11214



WILLIAM R. GUARINELLO  
*Chairman*

June 23, 2004

HOWARD FEUER  
*District Manager*

Mr. Harry Szarpanski, P.E.  
Assistant Commissioner  
Department of Sanitation  
Bureau of Long Term Export  
44 Beaver Street, 12<sup>th</sup> Floor  
New York, New York 10004

Dear Assistant Commissioner Szarpanski:

Thank you for your response of June 16, 2004 regarding the Department of Sanitation's recommendation to erect a king pile bulkhead wall to protect Marine Basin Marina.

Mr. Gagliano, the owner of Marine Basin Marina advised me that he had an opportunity to speak with you at the recent Public Scoping Meeting. Mr. Gagliano presented additional issues which we later discussed.

According to the proposed plans that you submitted to both Mr. Gagliano and Community Board 11, the wall appears, according to scale, to be approximately 150'. We would like further clarification as to the exact size and location of the wall. Mr. Gagliano, believes that the wall should be at least 800' in order to protect his property. In addition, he states that the wall should be placed as close to his property as possible, in order to prevent backwash.

We respectfully request an explanation of the placement of the wall along the building line and not along the property line which would protect Marine Basin Marina more effectively. Every effort must be made to protect Mr. Gagliano's property.

I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Howard Feuer".

Howard Feuer  
District Manager

Cc: Councilman Domenic M. Recchia



# COMMENT SHEET

**FOR THE PROPOSED SOUTHWEST BROOKLYN CONVERTED MARINE TRANSFER STATION**

Name (Please Print): Serry Goghans - Marina Beach  
Marina

Agency/Organization/Resident: \_\_\_\_\_

Address: 11900 Shore Parkway 11214

Email: \_\_\_\_\_

I would like to be added to your mailing list.

**Please provide written comments on this sheet and drop into the comment box or mail to\*:**

New SWMP Comments  
c/o Ecology and Environment, Inc.  
90 Broad Street, Suite 1906  
New York, NY 10004

**\*All mailed comments must be postmarked by July 9th, 2004 or delivered by 5:00pm on July 11th, 2004.**

COMMENTS: With a important subject  
such as this - there should  
have been more people and  
more advertisement -

facility that would utilize emerging and proven technologies in waste processing. The Southwest Brooklyn site could conceivably be the first site in the city to pioneer these technologies and open the door to methods which will not only be environmentally friendly but also cost effective.

I would like to say a word about the SWMP. I strongly believe that the methods outlined in the Zero Waste Policy plan should be incorporated into the SWMP.

Thank you for allowing me this opportunity to speak.

Carol Libby Hart  
1937 68th Street  
Brooklyn, NY 11204  
(917) 385-0445

### Testimony on Proposed Bensonhurst Marine Transfer Station

Good Evening, My name is Carol Hart and I am a member of the Brooklyn Solid Waste Advisory Board, a former Co-chair of the Citywide Recycling Advisory Board and a lifelong resident of Bensonhurst. Tonight I am speaking only for myself as there are others here to speak on behalf of those organizations. I would like to welcome everyone here who was not fortunate enough to be born here or currently reside in this wonderful community.

The policy of the BSWAB and the CRAB has always been to endorse the use of Marine Transfer Stations as an alternative to truck transport of waste. Regarding the Southwest Brooklyn site I do have a few questions:

1. When will the existing smoke stacks be torn down? They are a symbol of that dreaded word "*incineration.*"
2. Where will the garbage come from, only Brooklyn or from other areas of the city?
3. Approximately how many trucks will visit the site every day and what will be the hours of operation of the facility? Is this number more or less than the number of trucks that visited the site when it was used to transport waste to the Fresh Kills Landfill. If more trucks will visit the site than in the past has any thought been given to air quality, noise, odor, traffic (especially at the junction of Bay Parkway and the entrance to the Caesars Bay Shopping Center) and other residential impact concerns.
4. Where will the containerized waste ultimately go? Upstate NY or out of state? Are there any provisions that will be made for host communities to receive some sort of benefits from accepting our trash?
5. Since the site is 23+ acres is there any plan to expand the facility and with that expansion to accept more waste than the 1300 tons per day currently proposed perhaps from commercial waste?
6. And finally given the size of the site I believe it is an ideal place to build a

July 11, 2004

New SWMP Comments  
C/O Ecology and Environment Inc.  
90 Broad Street, Suite 1906  
New York, New York 10004  
888 692-7667  
FAX: 212 269-0788

**From CB1 Brooklyn, Environmental Committee**

Re: Comments on the Draft Scoping Document for the Draft Environmental Impact Statement for the NYC Comprehensive Solid Waste Management Plan

1. Health Impacts – The health impacts of the existing burden from facilities other than Transfer Stations must be considered for each community separately as the background load. In Greenpoint/Williamsburg (GP/W), this burden is enormous and includes: **21 Toxic Release Inventories** (TRIs are Federally registered facilities that use or store a certain quantity of chemicals annually) and **220 Right to Know Facilities** (RTKs are City and State registered facilities that use or store a certain quantity of chemicals annually). The **Newtown Creek Sewage Treatment Plant (STP)** is the largest STP on the East Coast and receives approximately 25,000 tons per year (tpy) of VOCs, or organic chemicals, which enter the plant as influent, annually. There is an additional 10 tpy of perc from the GP/W Dry Cleaning Industry. Both these chemical groups evaporate into the Greenpoint community in the aeration process. **Total emissions from power plants in and adjacent to CB1 are 6800 tpy.** These emissions include Particulate Matter (one of the main causes of asthma), Volatile Organic Compounds (or VOCs, which are carcinogenic chemicals), Carbon Monoxide and Nitrogen Oxides (chemicals which are two of the primary causes of Ozone), and Sulfur Dioxide (a chemical which contributes to severe respiratory conditions and is the leading cause of Acid Rain in the United States). South Williamsburg and Bushwick have the most deaths in NYC from power plant emissions (American Lung Assoc. and the Campaign for Clean Air). In the past 3 years, the Department of Sanitation (**DOS**) removed the **Greenpoint Incinerator**, which tested for heavy dioxin contamination in 1993 (dioxin is a chemical which results from burning plastics or from pesticides that is one of the most hazardous carcinogens; it is also suspected to be a lead causation for Lupus). Additionally the district is home to the 17 million gallon **Mobil Oil spill**, the **BCF Oil Superfund Site**, countless **Brownfields**, and the 2<sup>nd</sup> largest number of **oil/petroleum bulk storage** facilities in NYC.

Given this enormous background load, it is extremely important that the CEQR and SEQRA requirement of a full **Environmental Impact Assessment** on the full range of each impact associated with residential, private waste transfer stations, Marine Transfer Stations, and “Future No-Build Alternatives” be undertaken.



DSNY cannot use a generic impact area for generalizing each Community Board: the 3 Environmental Justice communities that currently host most of the waste in NYC have very different background loads. The CEQR requires minimizing and avoiding significant adverse impacts wherever practicable: the EAS should not be based on a "prototypical" transfer station but on a real-time assessment of the cluster of waste transfer stations in each community.

2. **One third of NYC's dewatered grit** (sewage) is transferred Citywide into and out of a local Transfer Station in East Williamsburg. The bacterial hazards associated with this particulate matter has not been clearly identified in terms of general health effects or as it relates to chronic breathing problems. **Perfumes** are used to disguise the smell of garbage at transfer stations. These perfumes' chemicals are known to exacerbate lung conditions. The particulate matter associated with Transfer Stations has never been thoroughly studied. CBI would like to see a **health study** on the dewatered grit bacteria, particulate matter and deodorizers associated with transfer stations and their affect on asthma. The Commercial Waste Study's conclusion that there are "no significant air quality impacts" from Transfer Stations is ridiculous and obviously not based on studies. Recent air monitoring by CBNS of Queens College found that Elemental Carbons from truck traffic in GP/W are often higher than the EPA Urban Air Quality Standard and were the highest they observed in NYC.
3. The **Marine Transfer Station (MTS)** System would be an equitable alternative to the present discriminatory system if all of the MTSs presently under consideration were re-opened, including those in Manhattan (3 plus an additional MTS south of 59<sup>th</sup> Street). This plan must be linked to the closing of land-based Transfer Stations or it will bring additional tonnage to each district with none of the promised reductions, which are absent from the Scoping.

In Greenpoint/Williamsburg, the Community Board fears the implementation of a new plan without consultation with our community. The emphasis of any GP/W plan **must emphasize the elimination of truck trips district-wide**. Moving much of the Transfer Station activity to the Greenpoint MTS, or to one of the alternative sites, will increase truck traffic in Greenpoint which presently has little Transfer Station activity and is already strangled by traffic from the re-construction of the Newtown Creek Sewage Treatment Plant, which will not be complete until 2012. The Greenpoint MTS and the STP share a common entrance on N. Henry Street which is presently, without the MTS traffic, often impassable. This district's solution must be accompanied by a creative traffic solution, such as the coordination with NYSDOT to build an off-ramp from the Kosciusko Bridge to the Greenpoint MTS or to East Williamsburg, in order to by-pass residences.

**The GP/W solution must not be to pursue both the "alternative" opening of a new inter-modal or marine-based Transfer Station in conjunction with the re-opening of the Greenpoint MTS.** 36% of the City's waste is already an

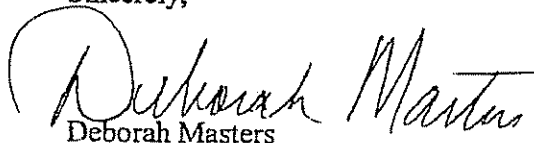
overwhelming amount of garbage for the 4.2 square miles that comprise GP/W. Your plan must pursue eliminating a large percentage of this waste. We would like to see a plan that proposes **in excess of a 1 to 1 closure system in GP/W**. 1 to 1 refers to tonnage: this commitment must be permanent; no additional sitings of Transfer Stations or increased capacity permits may ever be considered for GP/W: CB1 has handled over 1/3 of the City's garbage for over 15 years.

4. The Residential Waste Plan, the Marine Transfer Station Plan, the Commercial Waste Plan, and Siting Regulations should all be considered and implemented simultaneously to eliminate overburdening to any one Environmental Justice community and must all be part of DYSNY's SWMP. Considering each facet of the Transfer Station industry separately will not result in an equitable system.

Before pursuing any of the "Alternatives" schemes, DYSNY and the SWMP must make a profound commitment to an "equal distribution" policy so that each borough has an equal number of burdens which are not all clustered within one community board. The "Alternatives" must not come in addition to already existing land-based Transfer Stations and a Marine Transfer Station. In the case of Greenpoint/Williamsburg (GP/W), the other Brooklyn Marine Transfer Stations must be brought on line, in conjunction with the closure of GP/W's land-based Transfer Stations, to ensure equal distribution of all borough garbage.

Operational Regulations should be enforced at a heightened level.

Thank you for considering these additional comments from CB1, Brooklyn.  
Sincerely,



Deborah Masters

Chair, Environmental Protection Committee

Rochelle Stella

(Pg 1 of 4)

## Re-opening - Solid Waste Management Plant @ Southwest Incinerator

Meeting June 17 at Shallow at 5:30

Community called 311 to place a complaint to mayor # C1-1-117299361

Firstly, thank you for the positive declaration of an environmental Impact study. Which means that the city is admitting that this action will bring on an adverse effect to the environment and the city must take steps to insure that the proper steps are taken to protect the surrounding communities.

In the future, the city must do a better job of alerting the communities about these meetings. (Daily News, Post as well as Foreign Lang. Papers)

The meetings must be in a more publicly accessible place and closer to the community, which will be, affected the most. (Cavellero)

5:30 is not a convenient time.

At one time, this location was a waste station. Please bring us up to speed Which community District (CD) used it? What type of waste, commercial or residential or both. How many trucks were involved?

Future -- Where will this waste be carted off to? Lynbrook N.J.?? Canceled We do not want any work done on site until you have a contract, signed and sealed on where to put this waste. Otherwise, it will have to sit there.

We are not concern with the # of CD's that will feed into this station as much as the # of trucks that will feed into this station as compare to other stations that the city is in the process of building.

What type of waste will be loaded there? Residential (which represents most of our community board) or commercial or both. If it is commercial, will it be toxic? How will it compare to other areas of the city, which has a higher density of this type of waste?

How will the trucks travel to the dumpsite? Which roads? How are you going to solve the bottleneck that already exists along the service road?

What are your plans for noise and air pollution? Rat infestation and others?

What type of containers is to be used? How will the trucks unload their waste? How will it be loaded on to the barge? How often will the garbage be shipped?

Luckily for us our Assemblyman Bill Colton and our Councilman Recchia were instrumental in helping to close the southwest incinerator. Senator Golden is also very concern about the environmental impact on our community. Call them to let them know you have confidence that they will investigate and keep vigil in the planning to establish waste station at this location.

Let our CB 11 1-718-266-8800 know that we expect them to take an active role in all the decision-making plans and to ensure that they will keep the community up to date about these plans. Call Borough President Marty let him understand that we are a residential community.

Love Canal, Acid rain, 2 headed frogs in the mid-west, fish in the Hudson River unable to reproduce, anthrax , dirty bombs , traffic congestion, air pollution, rodent infestation, noise levels, these are some of our concerns

Remember, we have the best representing us, after all, we voted for them. Let them know that they have our support to fight for what is right.

Spread the word to environmental groups so they can keep tabs on this situation. Call in to your favorite radio or TV talk show so we can discuss the environmental impact and the allotment of trucks to this waste station.

Dial 311 and leave a message for the mayor. You do not have to give your name. Make sure you get a complaint number.

Please remember our Armed Forces. Let's ensure that they are receiving the best supplies, protection and care. Let your Federal Representatives know that we want Ft Hamilton to be one of the centers for Home Land Security and we want them to fight to get the HLS \$\$\$\$ back to N.Y.C.