

In Re Public Hearing Proposed Amendments to Rule Relating to
Commercial Waste Customers and Private Carters NYC - Department
of Sanitation
January 6, 2025

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PUBLIC HEARING
NEW YORK CITY DEPARTMENT OF SANITATION
PROPOSED AMENDMENTS
TO RULE RELATING TO COMMERCIAL WASTE
CUSTOMERS AND PRIVATE CARTERS

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January 6, 2025
10:03 a.m.

PUBLIC HEARING
Held Virtually
MicroSoft Teams

Court Reporter: Stephanie O'Keefe

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A P P E A R A N C E S :

MADELYNN LIGUORI

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MS. LIGUORI: Good morning and welcome.
My name is Madelynn Liguori. I am Senior
Counsel in the Bureau of Legal Affairs for the
Department of Sanitation. Thank you for
attending this public hearing this morning.

DSNY is conducting this remote hearing in
accordance with the requirements of the City
Administrative Procedure Act. The purpose of
this hearing is to receive comments from the
public on DSNY's proposed rule relating to
commercial waste customers and private carters.

This rule was published by DSNY in the
City Record on December 5, 2024, with a
scheduled hearing date of today, January 6,
2025. Additionally, DSNY emailed copies of the
rule to all New York City local elected
officials, the City's fifty-nine community
boards, media and interested parties, and
published the proposed rule on its website.

Section 16-116(a) of the New York City
Administrative Code requires commercial
establishments in New York City to arrange for
the removal of solid waste by a licensed
private carter or by obtaining a trade waste

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permit from the New York City Business Integrity Commission allowing the establishment to dispose of its own solid waste. Section 16-116(b) requires commercial establishments to post a sign noting the day and time that such establishment's trade waste is picked up or, if such establishment removes its own waste, the sign must note the registration number issued by the BIC. Section 16-116(c) exempts from these requirements any commercial establishment that generates infrequent or insignificant amounts of waste and authorizes the Sanitation Commissioner to promulgate rules determining what constitutes infrequent waste or insignificant amounts of waste. Section 1-06 of Title 16 of the Rules of the City of New York currently provides that a commercial establishment must generate less than twenty gallons of trade waste within a seven-day period to meet the definition of infrequent waste or insignificant amounts of waste to be exempt from the requirements of Section 16-116(a) and (b).

This rule proposes to lower the threshold

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of trade waste that is considered to be infrequent waste or insignificant amounts of waste from twenty gallons to one gallon within a seven-day period. This reduction is necessary because some commercial establishments have been setting out their trade waste at the curb for DSNY to collect or setting such material in DSNY street corner litter baskets. This rule will make it clear that a commercial establishment must retain a private carter to collect and remove trade waste generated at such establishment for proper disposal if such establishments generate more than one gallon of trade waste within a seven-day period.

Commercial establishments are already required by rule to place their waste out in a bin or container. This rule will also allow any commercial establishment that generates twenty gallons of waste or less over a period of seven consecutive days to share these containers with another commercial establishment, provided that both entities are customers that have agreements with the same

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private carter in accordance with all rules and regulations and follow all applicable rules relating to the setout of materials for a private carter.

Private carters sometimes utilize a flat billing method where they charge a customer the same flat monthly fee based on an estimate of the average amount of waste the customer produces. Rules of the Business Integrity Commission currently address waste surveys used to determine flat billing amounts. These rules will not apply to designated carters subject to the Department's commercial waste zone rules within an implemented commercial waste zone. Therefore, the Department is proposing provisions to ensure that private carters conduct waste surveys to generate an accurate estimate of the average amount of waste a customer produces when a flat billing method is used.

A court reporter is present today and will record the hearing. You may present an oral statement or submit written comments concerning the proposed rule. We have been accepting

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written comments on the proposed rule since it was published. Today is the deadline for submission of written comments. Such comments may be emailed directly to nycrules@dshny.nyc.gov by 5PM today.

DSNY will make available a copy of all written comments received through today, together with the hearing transcript, for viewing on its website within the next few weeks.

DSNY will carefully consider all the comments it receives today at the hearing and all written comments it receives.

I will begin calling those of you who wish to speak this morning in the order in which you have signed up to testify. While the notice asked that persons wishing to testify sign up in advance of this hearing, anyone wishing to testify at this time may do so by indicating in the chat area that you wish to testify by indicating your name and affiliation, if any. When you speak, please say your name and affiliation, and speak slowly and clearly so that the court reporter can understand and

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accurately record your statement. We also ask that you limit your statement to three minutes.

I will now begin by calling our first person to testify, Thomas Toscano, the CEO of Boro-Wide Recycling. Mr. Toscano.

MR. TOSCANO: Good morning. My name is Thomas Toscano, as you just said, and I'm the president of Boro-Wide Recycling.

We're in favor of the rule that reduces the infrequent or insignificant amounts of waste to one gallon, so we'll start in a place of agreement.

We're also in favor of allowing customers that generate less than twenty gallons of waste over a seven-day period to aggregate their waste with other customers in shared containers. However, we want to call to the DSNY's attention how this will make the survey process, that is the subject of the balance of this proposal changes, more difficult.

Since a customer will not be able to separate their waste without leaving the waste outside the container, in violation of other Department rules, understand that in order to

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bill different customers for different amounts of waste in the container, we have to segregate it to figure out who is producing what. This will not be too much of a factor with volume-billed accounts, but for weight-based accounts, there probably won't be too many, but it could create some difficulty in serving these accounts. Therefore, we suggest that these container aggregation rules be limited to accounts that are billed based only on volume.

The remainder of the proposed changes deal with the survey process, and in a lot of ways, these differ significantly from the current rules in effect with the Business Integrity Commission. So, for that reason, I will -- for reasons I will specify, we are opposed to changes to this structure.

I will start by saying that I am a member of the Trade Waste Advisory Board, and I have attended almost every meeting for the past decade or more with the BIC. I don't remember a single topic raised by the BIC that indicated there was a problem with the survey process. Put more simply, the BIC tracks complaints and

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they never raised widespread survey issues with the industry. If we have a system with very few complaints, why would we want to revamp it? We recommend the DSNY mirror the current rules that the BIC has with regard to surveys.

The proposed changes mandate surveys within thirty days of an account going to flat-rate billing. We were just involved in the transition of the Queens Central Zone, where we onboard nearly 5,000 customers. It was a daunting task, and I cannot imagine adding thirty-day surveys to the process for all these accounts. It would also affect the number of assigned accounts we have offered to take from the DSNY and the future zones that are rolled out that we're participating in.

Further, the awardees that will be subject to these rules have already proposed survey processes to the DSNY in their proposals. Zones were awarded based on these proposals, and those proposals met further requirements regarding third-party audits to customers that requested them.

The new survey process seems to disregard

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those proposals, along with the BIC rules that had worked for decades. These changes could inadvertently cost customers more.

There is a third-party survey option available to customers. The proposals do not require that all of the independent surveys be free, the ones from the carters are always free, just to be clear, but if a customer and the awardee dispute a survey, the third-party resolution could cost the customers a fee because of the annual survey requirement.

Again, we suggest the DSNY adopt the BIC rules that do not require a survey and only give the customers a right to request a survey up to twice annually.

If the DSNY wants a mandated survey, they should only be required for customers producing more than twenty yards of waste and recycling a month or 1,500 pounds of material in a month. This would eliminate small producers of waste and recycling and would reserve those labor-intensive measures to the larger producers that need surveys and are currently getting them pretty frequently.

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That's it. Thank you.

MS. LIGUORI: Thank you very much, Mr. Toscano.

I am now gonna call for Josh Haraf, the vice president for New York City Market at Action Environmental Services. Mr. Haraf.

MR. HARAF: Good morning. Thanks for the opportunity to express a response to the DSNY's proposed rule changes sectoring containerizations and waste generation audits for commercial waste collection.

My name is Josh Haraf. I'm the market vice president for New York City at Action Environmental Services, a subsidiary of Interstate Waste Services.

Over the past twenty-five years, Action has serviced thousands of customers across the five boroughs and is prepared to navigate our fellow community businesses throughout the transition to a TWD model.

We champion the consistency of our service, a commitment to our customers' experience, and the affordability of an essential service, and that is why we strongly

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feel that the changes being proposed for commercial waste generation audits will impose undue and substantial additional effort, time, confusion, and cost for, both, awardees and customers. As zones are implemented, it's our priority to limit customer disruption and we believe the prerogative will be burdened by these new waste audit requirements.

As we're all aware, Local Law 199 incited vast regulatory reform with real community impact. Best practices for a successful regulatory transition would suggest close collaboration among DSNY, BIC, awardees, and customers as commercial waste zones are rolled out.

For this reason, Action reiterates our support for intro number 352, primarily sponsored by Council Member Sandy Nurse, for the creation of a CWZ working group that includes all stakeholders that can collectively address CWZ rollout issues with the broadest amount of both knowledge and experience.

As it pertains to the commercial generators of infrequent or insignificant

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waste, Action supports these new rules regarding small waste generators. The consolidation of collections for this group will likely save time and effort for both awardees and customers. However, we recommend DSNY consider different implications of this rule for weight versus volume customers.

As it pertains to the frequency and volume of waste audits, we believe that the main priority during a transition period should be the accuracy and ease of a customer service. If awardees are required to survey every customer that utilizes a flat-billing method within thirty days after the date of the first invoice, awardees will be inundated with waste audits to perform.

Based on the customer data provided to awardees by the DSNY during the Queens Central recent transition period, one zone contained nearly 12,000 customers. If the DSNY intends to rollout multiple zones simultaneously, the only way to comply with this rule will be to purchase new scales for all CWZ vehicles, incurring an increase in overall cost

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of service.

Based on the proposed audit cycles, awardees could be performing waste audits during every month of the year for periods lasting a minimum of thirty days for each customer. Tracking a respective customer's waste audit periods will become onerous to individually monitor and acquire dedicated office staff to adequately address each audit. The current BIC regulations, an awardee maintains zero waste plan afford customers the avenue to request waste surveys while maintaining awardee autonomy to perform them in a manner that preserves operational and financial practicality.

The proposed rules did not account for the strenuous effort required by awardees to constantly perform audits, nor did they consider customer rate and service confusion during an on-boarding period in which customer education is critical.

If awardees must reconcile previous invoices against the first waste audit, that calls to question the process in CWZ waste

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reporting procedures for service agreement rate adjustments, rebates, discounts, additional fees based on audit results, and overall customers confusion for what they owe.

Rather than publicly announce the standard timing for waste audits, Actions strongly recommends the DSNY to preserve the integrity of waste surveying by accepting awardees' proposals within respective zero-waste plans. There are drastic operational and financial implications from the proposed rule changes, and we would like to caution DSNY to consider the breadth of the impact these changes will impose past the intention of the amendment.

Thank you for your attention and consideration.

MS. LIGUORI: Thank you very much, Mr. Haraf.

Would anyone else like to testify at today's hearing? You can indicate so on the chat, or you can use the raise-hand function.

(Pause.)

Comments may still be submitted to the Department via e-mail at nycrules@dsny.nyc.gov

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until 5:00 p.m. today, and also may be posted
on the NYC Rules website.

If anyone wishes to testify, you may
indicate so in the chat or use the raise-hand
function.

(Pause.)

Okay, seeing that no one else wishes to
testify, thank you everyone for coming today
and have a wonderful day. Thank you.

(Time Noted: 10:17 a.m.)

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