

COLUMBIA UNIVERSITY

IN THE CITY OF NEW YORK

INTEGRATED WASTE MANAGEMENT SYSTEMS EARTH ENGINEERING CENTER

Comments on NYC's Solid Waste Management Plan: Commercial Waste

Before the New York City Council
Committee on Sanitation and Solid Waste Management
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Good afternoon. My name is Benjamin Miller. I am a research associate at Columbia University's Earth Engineering Center and I am providing these comments on behalf of the Center.

There is much in the commercial waste portion of the Solid Waste Management Plan that deserves applause. Most importantly, by proposing to accept commercial waste at the West 59th Street Marine Transfer Station as well as at the city's other marine transfer stations, the city will produce dramatic reductions in truck miles travelled, which will reduce air emissions, noise emissions, fuel use, traffic congestion, and roadway maintenance costs. Accepting commercial waste into the city's publicly controlled transfer system should also reduce costs for city businesses, which ultimately will be beneficial to all city residents.

But there are steps the city should take to further decrease truck miles travelled and the financial and environmental costs of commercial waste management.

- First, the City should use franchising to direct commercial waste to its MTS's. In addition to being the most effective way to specify where commercial waste should be transferred, franchise territories would reduce collection miles by eliminating the multiple collection routes that now service many commercial blocks. Other benefits could include the required use of clean-fuel vehicles, potentially greater competition and transparency in cost arrangements and lower fees for generators, the possibility of franchise fees for the city, and the possibility of increasing the city's control over the hours during which collection and transfer takes place.

In view of the public benefits to be achieved by receiving commercial waste at the MTS's, in the near-term—while a franchising system is being established—it may be in the city's interest to provide cost incentives in order to attract private carters to the MTS's.

- Second, just as the plan calls for sharing MTS space with private carters at the other MTS's, in addition to accepting commercial waste the 59th St. MTS should allow DS recycling trucks to transfer metal, glass, plastic, and paper there, in order to reduce the truck miles that would be travelled taking loads collected from mid-town to Gansevoort Street and returning the trucks uptown.
- Third, arrangements for accepting commercial waste should extend to composting. The plan's proposal for developing a second in-city in-vessel composting facility at the Hunts Point Market, following the successful experience of the Riker's Island facility, is a good one. Additional such in-vessel composting capacity for source-separated food waste from public and private institutional kitchens and restaurants should also be developed.
- Fourth, the city must refuse to allow commercially generated food waste to be disposed of, via in-sink garbage disposals, in the city's sewage system. Allowing in-sink disposals would represent a transfer of costs from the private sector, where for many reasons, including the need to provide direct financial incentives for waste prevention and composting, they should remain. In addition to increasing the costs of the city's wastewater management system—perhaps even more than the costs that would be displaced from the private side of the ledger—this would produce significant environmental costs, including increased nitrogen loadings to the surface waters surrounding the city.
- Fifth, just as a rational plan for transfer facilities for Department of Sanitation-collected waste must depend on a plan for the entire *disposal* system—including a plan for minimizing transport costs through direct city contracts with the transportation providers, and a plan for controlling disposal costs by developing public control over landfill and waste-to-energy capacity (which will be less expensive than landfilling as well as environmentally preferable to it), the city's plan for developing private-carter transfer facilities also must encompass a strategy for developing public control over these ultimate disposal facilities.

The need for developing publicly controlled landfill and waste-to-energy capacity was the primary thrust of the comments we provided on the City's Draft EIS last month. I have appended a copy of those comments here for your reference.

Thank you.