## NYC - Business Integrity Commission June 20, 2018

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4	FINANCIAL HARDSHIP WAIVERS FOR TRADE WASTE
5	LICENSEES AND REGISTRANTS PUBLIC HEARING
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## NYC - Business Integrity Commission June 20, 2018

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     SAL ARRONA,
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     JOHN GAUDIUSO,
     John Gaudiuso Landscaping Corp.
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     ANTHONY PADULA,
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     STEVE CHANGARIS,
     New York City Chapter NWRA
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     THOMAS TOSCANO,
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MS. SCHNEIDMILL: Good morning, and welcome to today's public hearing. Today is Wednesday, June 20, 2018. It is approximately 10:20 a.m. We are in the 20th floor conference room of 100 Church Street. My name is Naomi Schneidmill. I am Executive Agency Counsel at the New York City Business Integrity Commission. Thank you for attending today's hearing.

The Commission is conducting this hearing pursuant to the requirements set forth by the City Administrative Procedure Act, commonly referred to as "CAPA." The purpose of this hearing is to receive comments from the public on the Commission's proposed rule regarding a Financial Hardship Waiver relating to Local Law 145/2013. The Commission published the proposed rules in the City Record on Monday, May 21, 2018. We also disseminated a copy of the rules via e-mail to all New York City local elected officials, the managers of all 59 Community Boards, several media organizations in the city and other interested parties. Lastly, we posted the proposed rules on both the

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Commission's and the New York City Rules' websites.

Local Law 145 of 2013 requires all heavy-duty waste hauling vehicles by January 1, 2020, to have a year-2007 engine or later or have a retrofit installed on older engines. A heavy-duty trade waste hauling vehicle means any diesel fuel powered vehicle with a gross weight of over 16,000 pounds that is owned or operated by an entity that is required to be licensed or registered by the New York City Business Integrity Commission and that operates in New York City for collection and/or removal of trade waste. Last week, our city agency partner, the Department of Environmental Protection, held a public hearing on the standard for the best available retrofit technology for companies who wish to install retrofits on their pre-2007 engine trucks.

Section 24-163.11, Subsection (2)(c) of Local Law 145 provides that the Commission may issue a temporary waiver of the requirements of the law for applicants who face an undue financial hardship. Thus, the

Commission is engaging in the rulemaking process to establish criteria for such a waiver. Today's hearing provides the opportunity for public comment on the Commission's proposed hardship waiver rule.

The Commission will be authorized to deny a license or registration application for failure to comply with Local Law 145, or to revoke or suspend an existing license or registration where the company has been found in violation of the local law. In fact, as of January 1, 2019, BIC can deny a license or registration for a company that has failed to demonstrate to our satisfaction that they will meet the requirements of the local law by January 1, 2020.

The Commission will require that the application for the waiver be filed with the Commission on or before January 1, 2019. An application for renewal for an existing waiver must be filed no later than 180 days before the expiration of that waiver. And all waivers issued shall expire by January 1, 2025.

Pursuant to the proposed rule, to

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qualify for a temporary waiver from the requirements of Local Law 145, the applicant must demonstrate that complying with the requirements of the local law would present an undue financial hardship. A licensee or registrant must provide us with information that -- one, bringing the company's fleet into compliance would cost more than 15 percent of the company's average gross revenue from the previous three years, supported by documentation, specifically, the last three years of federal income taxes. Two, the applicant has made a good faith effort to secure financing to cover the costs of bringing its truck fleet into compliance with the new rules but has been unable to secure financing; and three, a written plan explaining how and when the applicant will be able to comply with the local law. As to the first requirement, examining

As to the first requirement, examining a company's gross revenue requires the applicant for the waiver to provide us with federal tax returns. There is no new documentation that needs to be prepared by an accountant and no new financial statements

that need to be created. The three-year average gross revenue is a good indicator of how the company is doing financially.

That concludes the summary of the proposed rule regarding financial hardship waivers. You may present an oral statement for the record or submit written comments concerning the proposed law. Additionally, the Commission has been accepting written comments on the proposed rule since the publication in the City Record, and will continue to do so through the close of this hearing.

The Commission will carefully review and consider all comments and submissions and make changes, if the Commission deems them necessary. Any written comments that are received in connection with today's hearing will be available on the Commission's website. The new rule will go into effect 30 days after they are published in the City Record.

We will begin by calling those of you who wish to speak this morning in the order in which you have signed in. When you speak,

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please state your full name and affiliation, and speak slowly and clearly so that the court reporter can understand and accurately transcribe your statement. We ask that you limit your statement to five minutes.

Salvador Arrona, the Commission's

Director of Policy, will now begin calling up

members of the public to testify.

MR. ARRONA: Good morning. Our first speaker is John Gaudiuso.

MR. GAUDIUSO: Good morning, everyone. My name is John Gaudiuso. landscaper -- small business, two trucks. According to this law, we were forced to buy new trucks because of this pollution. buy one new truck, but I can't afford to buy another one. It's a financial burden on my business, on my family, and I just can't do And I feel that the city agency it. shouldn't tell you that you should be -- if you don't do it, you're totally out of business. You can't get a license and you can't do it because you can't afford to buy another truck. Thank you. That is all.

MR. BROWNELL: Sal with the list is

going outside. Who else wants to speak?

Or they could just go up.

MR. REYNOSO: I'll go up. Can I go up?

MR. BROWNELL: Yes Council Member Reynoso.

MR. REYNOSO: Okay. Thank you so much.

I'm Council Member, Antonio Reynoso. I represent the 34th Council District in Williamsburg and Bushwick in Brooklyn and Ridgewood in Queens. I'm also the Chair of Sanitation and Solid Waste Management in the City of New York. And I also oversee BIC City Council.

The previous statement related to landscapers, I think -- I want to make sure that I note that this is not related to any other portion of this law outside of private sanitation industry, not for me. That's up to their discretion.

Just yesterday, I held a hearing on
Intro 157, a bill aimed at reducing transfer
stations capacity in overburdened districts
like mine. One of the primary goals of this
legislation is to reduce the immense amount
of pollution that private carting trucks spew
into these districts on their way to the

transfer station.

We heard testimony yesterday from residents of Warwick, Brooklyn; South Bronx and Southeast Queens, speaking to the ailments they've suffered as a result of breathing the toxic fumes on a daily basis. We heard from a pediatrician on the impact these pollutants have on the health and development of young children.

As a father myself, I am extremely concerned about the health impact on my son and the rest of the children in my district of Williamsburg. And you have the current situation in these communities, I'm worried about how BIC can possibly consider allowing these companies to remove a hardship waiver.

This rule is even more ridiculous when we consider the corner these companies have cut to make a profit. They steal wages, refuse to implement basic safety standards or buy safety equipment for their workers, break traffic laws, and keep old and new trucks on the road. The law requiring trucks to comply with the 2007 emission standards was passed in 2013. These companies have had five years

to get their acts together. A two-year hardship waiver would give them seven years and that's plenty. Yet BIC is proposing to allow these waivers to be renewed until 2025; that allows companies 12 years to comply. By 2025, the 2007 emission standards will be completely out of date, and I would hope that the industry would have moved completely away from diesel trucks and considered CNG or electric vehicles.

We need to stop handling these companies with kid gloves. It's time for the private carting industry to take responsibility for its impacts on low income communities of color, and it's time for BIC to stop facilitating the industry's ability to skirt this responsibility. If an agency will not protect the health of the public, what does that say of our city? We, as government, must do better. We have an opportunity today to do the right thing -- modify this rule and eliminate any renewals of the hardship waiver. Thank you.

MR. ARRONA: Our next speaker is Anthony Padula.

MR. PADULA: Good morning, everyone.

I'm Anthony Padula, A.C.P Landscaping. I
have one single truck which complies with all
of the Commission's tests that New York puts
out. It's one single truck. I'm getting
roped into this new law by fifteen to 2,000
pounds, which is unfair. There is no
retrofit equipment for this truck, which will
force me to buy a new truck at \$71,000, which
I don't have that money. It's my only truck
that I have, and it's going to put me out of
business. So, that's all I have to say.
Thank you.

MR. ARRONA: Our next speaker is Steve Changaris.

MR. CHANGARIS: Good morning. My name is Steve Changaris. I am the New York City Chapter Director for the National Waste and Recycling Association. That Chapter is part of the National Trade Association that represents the Private Sector Waste and Recycling Industry. We have an active chapter of member companies operating in the city. The hardworking men and women of our chapter collect and manage the waste

recyclables and organics produced by the city's nearly 200,000-plus commercial entities. It's a big task every day done year round in good weather -- hot and cold. We work as BIC licensees to provide excellent service to customers, good paying with characteristically union jobs to employees, and to collect and manage the city's waste, recyclables and organics as safely as possible, and to be as good corporate citizens as possible in the neighborhoods and communities we serve.

The New York City chapter supported the enactment of Local Law 145 of 2013, and that is the cause of this revision to the BIC code today. We did so even though it imposed new mandates and related costs on us as permitted and regulated companies doing business in the city. In the case of Local Law 145, the Council and Mayor agreed to an extended seven-year lead time for us, as BIC licensees, to phase-in the full scale operation of the new truck emission requirements. This seven-year phase-in period is an acknowledgment of the extensive

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capital investment that the trade waste industry has in its truck inventory that it uses to service the needs of the city's commercial trade waste generators. And it is also a recognition that the upgrade demanded in the local law represented quite a new and additional significant investment in that trucking inventory.

Last, in addition to the lead time, the local law also created a process for the BIC to grant a financial hardship waiver from compliance with the new standards to any licensee under specific circumstances. The proposal under consideration here today seeks to enumerate and specify those circumstances pursuant to the demand in the local law.

The New York City chapter is proud of the accomplishments made by the companies in the New York City's trade waste industry to date, seeking to come into full compliance with the new trade waste truck emission requirement of Local Law 145. So proud, in fact, that we believe the BIC should only very rarely -- and under very limited circumstances -- be inclined to issue any

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financial hardship waivers for trade waste licensees seeking to be exempt from the new truck emission standard.

Specifically, Section 2-09(b)(1) of the proposal should be deleted in its entirety.

We are not persuaded that an expense greater than a 15 percent average gross revenue for three years is a bona fide financial hardship threshold. Further, it would send the wrong signal -- one that rewards delay, and one that works against all the other licensees who have stepped up and already made investments in new trucks and better emissions control equipment to further the aims of Local Law 145.

We believe the good faith standard in Section 2-09(b)(2) about efforts to secure financing should also be deleted. Financing for trucks and emissions retrofit equipment is widely available and lending markets in the waste services industry have been strong since 2013 and look to remain strong for the foreseeable future. Any viable BIC licensee company in business in the city today who can transit the waste can get the financing

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needed to purchase emissions-compliant trucks or install the emissions retrofit technology.

Section 2-09(c) of the proposed regulation allows for the BIC to issue a financial hardship waiver for a period of not more than two years and allows waivers to be granted with expiration dates to expire no later than January 1, 2025. Given the long lead time in Local Law 145 to comply with the emissions standards established in the statute, the New York City chapter believes a two-year period for such a waiver is too long. Waivers should be granted rarely, as already stated, and only for the shortest 30-60-90 day time period, while having BIC retain the discretion to extend those periods under exigent circumstances. One such exigent circumstance may be that the new truck or equipment is purchased but on backorder from the factory. Six months or longer supply chain kind of delays in the truck manufacturing industry are often not uncommon. Also, the New York City chapter believes no BIC truck emission financial hardship waiver should be enforced after

January 2021, one full year from the date of truck emissions compliance called for in Local Law 145 back in 2013.

On a different note, the chapter believes that the BIC should not issue a truck emissions standard financial hardship waiver to any licensee whose company's trade waste truck fleet is not at least 50 percent in compliance with Local Law 145 by July 1st of next year.

The chapter also believes the BIC should have this revision to the code, implementing the financial hardship waiver for compliance with new truck standards, speak to how it will accommodate the anticipated sale and purchase over the next year and a half period of those licensee companies that decide to leave the New York City trade waste market instead of upgrading to new truck emission standards.

No one can predict with certainty what this sale and purchase process will look like, but anticipating it and planning for it to help the transition work seamlessly seems reasonable to the chapter under these

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The BIC should consider circumstances. including a provision in this code revision for a short-term financial hardship waiver from truck emission compliance, for the inventory or number of trucks subject to the sale or sales, should the acquiring company's existing emissions-compliant inventory not be sufficient to maintain the BIC expected level of trade waste collection service to the customers of both its existing customer base and the newly acquired customers. Without such an accommodation by the BIC, the transition to fewer truck emissions envisioned and underpinning the policy cause of Local Law 145 will only be further delayed.

The chapter appreciates the opportunity to provide this testimony and looks forward to continuing its work with the BIC on this and other trade waste issues in the city.

Thank you.

MR. ARRONA: Our next speaker is Tom Toscano.

MR. TOSCANO: Good morning, everyone.

My name is Thomas N. Toscano, and I am proud

to be the CEO of Mr. T Carting Corp., a third-generation family business that has served New York city for nearly seventy-one years.

I start by stating what the desired outcome for this waiver process is. I believe the City wants compliance with Local Law 145 but does not want to have a harsh punishment to companies that are diligently trying to comply with the law, yet have extraordinary financial hardships in doing so. The word extraordinary is key here, because replacing an entire fleet of trucks will create a financial hardship in just about any company. I submit to you the proposed rule that you offer does not achieve that objective, and I'll give you three examples as to why.

The first is my own company. In 2011, it went through a bankruptcy that was based on a liability that it had no hand in creating. While the origins of that bankruptcy are not relevant, its consequences are to this proposed rule. As you can imagine, it is extremely difficult for

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companies with recent bankruptcies to obtain financing, and our case was not officially closed until very late 2013. Yet, in 2014, my company started a plan to comply with Local Law 145. That year we bought four trucks, and it was extremely difficult to obtain the financing to get those trucks. Still, every year after that we bought more trucks with a plan to be fully compliant by And I tell you standing here that I fully expect to be compliant by early 2019, well in advance of the deadline for this new Trust me when I tell you that my law. company had a financial hardship in complying with this law, yet we are going to comply.

As a second example, if you take a company -- same situation as mine -- and move the bankruptcy ahead a few years, that company, again, could have a very hard time meeting the law and come close to the deadline; you could have that extraordinary hardship because they don't meet that 15 percent threshold.

The third comparison would be a company that has done nothing to work towards

compliance and needs every one of their trucks replaced. That third example has the right to apply for the waiver because they would likely exceed the 15 percent threshold.

I trust you see the reversed incentive in this rule you propose. There will be companies that would actually put off purchasing trucks so that they meet the 15 percent threshold. I know this is not what the city wants, but it's what this proposed rule encourages.

Instead, consider the following alternative. Why not have a threshold of trucks already compliant? We have all known about this law for the past five years, and there is another year and a half before compliance is due. It is hard to see a case where a company would not have done at least half of their fleet by now if they were planning on complying. There is your first requirement for a waiver.

Second, instead of percentage of revenues, look at a leverage ratio, like debt to equity, to demonstrate the inability to obtain financing. I can throw out numbers of

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what a distressed company would look like, but the BIC has the financials of all the carters in the city, and they can make a determination for these laws passed. gives you two strict, objective measures, Then the BIC can add in a third okav? subject in the waiver in which they can look at good faith. They could look at things like -- has the company been working towards compliance? Has the company been paying extraordinary dividends and salary to their offices instead of buying trucks. If you look at those three pieces together, they can easily then determine whether the hardship is ordinary or extraordinary. I believe I have demonstrated to you why the rules you propose do not get you to your desired outcome. hope my alterative will at least give you food for thought for rules that will. Thank you for your consideration. MR. ARRONA: Our next speaker is Nelson Quinones.

MR. QUINONES: Hi, my name is Nelson Quinones. I am the president -- the CEO of Integrity General Contractors and Carting.

We are a Bronx-based business. I just want to touch on one thing. I'm speaking on the behalf of the little guy, right? I'm a four-truck operation. I employ communities in the Bronx. I provided work for them with benefits and a means for them to support themselves, right? So, I want to say that it's in the best interest of every company to run well-maintained trucks, because at the end of the day, it's reducing your liability in the street and protecting your insurance and protecting the environment.

I'm all for leaving a greener footprint in the society because years to come, we want our children, obviously, to have greener days. So, I'm for the curtailing of trucks and the improvements, but I think that the BIC really needs to assess the impact that it's going to have on smaller businesses.

For example, I just upgraded my 1993

Mack truck, which was well-maintained and had no leaks, right, to a 2019 Peterbilt. But as we all know, it's a strain. I mean, there's truck payments, there's insurance that's more than the truck payment, right? So, these are

added costs to us. So, by setting some of these standards, which is the right direction to go into for the future, we have to take and assess the impact that it's going to have on the smaller businesses. Because if you hurt the smaller businesses, in essence, you're hurting the small communities that depend on employment from these small businesses and depend on opportunity, work opportunity.

And at the end of the day, if we eliminate the small mom and pop shops in our community, we're really creating a monopoly with the bigger industries and the global guys, okay? Because if we can't provide the service, they'll have no choice but to call, you know, the big corporations that obviously have the fleet of sixty, seventy trucks and there won't be a problem to provide them, but you're taking away opportunities from us by setting some of these timelines and constraints.

And I think also that the BIC needs to see the debt-to-income ratio like Mr. T -I'm calling you Mr. T, I know it's not your

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real name but -- for Mr. T. Carting, I totally agree with that because a company could be making \$10 million a year, but their expenses could be 9.5; do you understand? So, at the end of the day, you don't have much to put back into, you know, your fleet or improvements to accommodate or, you know, comply with the local law.

So, now, what's the company forced to do? Shut down trucks. Obviously, that's going to cause a chain reaction where people are going on unemployment, not being able to support their families, going on into the -putting a bigger strain on the public benefit's system, and, you know, that's what I want you guys to realize and really assess there's a bigger impact. When we do assess it, just consider the debt-to-income ratio, because like I said, just because a company is making XYZ a year -- you really have to see, this is a very expensive industry, and I haven't been in business long, okay? I came into business after this rule came into effect in 2013. Okay. So, I've been in business for four years -- just so you know.

I reinvented myself and got into the carting business.

The point is, I didn't even plan to speak today. They asked me, "Would you like to speak?" I said, "Sure. Put me down."

But I'm speaking from the heart, okay? And you have to realize that these rules, okay -- there's bigger companies that can absorb a bigger punch, obviously. And, you know, if you shut down a few trucks and you got 17 trucks to work with, you know, you can do it. But if I got four trucks and you shut down three of my trucks, you'll put me out of business.

So, that's what I have to say. You know, let's consider all aspects of the waivers and who is going to be granted the waivers. And at the end of the day, let's be just about it. Just and fair, that's all I can ask for, right?

MR. ARRONA: Our next speaker is Kendall Christiansen.

MR. CHRISTIANSEN: Good morning. My name is Kendall Christiansen. I'm the Executive Director of New Yorkers for

Responsible Waste Management, which is an association of locally owned companies that provide a wide range of commercial waste recycling or organics collection processing and disposal services for the city's businesses.

New Yorkers for Responsible Waste

Management was created a little over two

years ago, well after the adoption of Local

Law 145. I will submit a statement for the

hearing record later today. Suffice it to

say for this purpose I want to just say, get

out, to the testimony provided by the

National Waste and Recycling Association

chapter, and that of Tom Toscano as well.

We agree that the issuance of hardship waivers should be extremely limited. It should be based on an objective standard, followed by the subjective review by BIC. And that's what our statement for the record will say. We'll submit it later today. Thank you very much.

MR. ARRONA: Our next speaker is Ron Weber.

MR. WEBER: How are you doing? My name

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is Ron Weber from Envirogreen Services. is my only question for the rule -- is that it was stated in the beginning that on January 1, 2019, BIC can already start not 5 renewing people's licenses who are based -if they don't feel that the company is moving in the right direction towards the law. So, what is that criteria? I mean, or having 9 (inaudible) to know exactly why they made the law a year earlier. I'd also like to second 11 and third the other companies that mentioned 12 here the criteria for the waiver based on 15 13 percent of gross revenue over three years is 14 absolutely not a true statement, 15 debt-to-income ratio is the correct way to 16 look at it. I am also a small company with 17 five trucks. I need to replace three of 18 So, that's a hardship for me as well. them. 19 So, I need to know if there is a different 20 way that it could be looked at -- the 21 financial waiver, gross revenue is a very 22 inaccurate way to help companies financially. 23 Thank you. MR. ARRONA: Our next speaker is Justin 25 Wood.

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MR. WOOD: Good morning. I'm Justin
Wood. I'm the organizing and research
director at New York Lawyers for the Public
Interest, and we are a member of the
Transform Don't Trash New York City campaign.
Thank you, Commissioner Brownell, and to the
staff at Business Integrity Commission for
the opportunity to comment on this proposed
rule.

We have several concerns about the hardship waiver proposed today. The purposes of Local Law 145 has been well-documented and echoed in every sustainability plan released by two different mayoral administrations since the law passed. In the years since the law was first proposed, the need for serious upgrades to the standards of the fleets in private sanitation have been made even more clear, the impacts of climate change and on our city's communities have been well-documented and more recently, the grave safety implications of outdated garbage trucks traversing the city every day and night have become all too familiar. In fact, it's like a weekly occurrence now.

The bar should be set high for any waivers, we believe, because the law sets the environmental bar so low for the trade waste industry. And I want to be clear here, we weren't really contemplating -- we understand there's landscapers in the room. What we're talking about here are the trucks that put a lot of BMT on the road. Whether the C&D operations or the contrastable operations that tend to operate at night.

So, from the perspective of our testimony, I just want to be clear that my guess is there is an enormous difference in the mileage you're putting on trucks with a small landscaping operation versus a commercial contrastable operation.

Since the law passed, the private waste industry has already had a full five years to bring trucks up to the minimal 2007 EPA standards and a 2020 deadline for compliance. By the time we get back, the waste industry will have had a full seven years to meet the standard.

We also believe that any waivers for genuine financial hardship should be

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non-renewable. We've reviewed diesel emission waivers from 14 different states and cities, and none of them grant renewable or permanent waivers for heavy diesel vehicles, much less five-year-permanent waivers.

And then furthermore, we want to raise the issue that we think the criteria here are really narrow -- particularly in light of all the other issues that BIC, DSNY, and other agencies are trying to address with the trade waste industry. So, in particular, we agree with many of the other speakers that the 15 percent gross revenue criterion is really narrow. And this is a huge missed opportunity if to take into account safety, in particular, and treatment of workers by applicants for hardship waivers.

For example, a recent review of federal data showed that more than half of the private sanitation trucks inspected by the DOT in New York City were ordered out of service due to safety violations and maintenance problems; that's more than double the national average. Unfortunately, a failure to make basic upgrades to truck

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fleets often goes hand in hand with cutting corners on labor standards, safety and recycling standards. We applaud the Business Integrity Commission's work on developing basic safety protocols for the industry. And at a minimum, we think a hauler's track record and compliance with safety standards should be weighed heavily in the decision of whether to grant a waiver.

Finally, we note that while millions of New Yorkers affected by diesel emissions -- particularly those in environmental justice communities where the bulk of the C&D and contrastable waste transfer stations are and therefore the truck fleets are concentrated -- are still waiting for haulers to adopt the 2007 model diesel engine. Other cities are rapidly switching to near zero emissions fleets, such as CNG emissions as part of their transition to a franchised waste system.

We urge the Business Integrity

Commission, DSNY, and other relevant agencies

to incentivize a similar transition from low

or zero emissions trucks as we move toward

the implementation of our own zoned commercial waste system. And to look at each hauler's fleet holistically, including trucks used for C&D collection, roll-on roll-off collection, and trade waste collection in evaluating their compliance with the emissions standards we hope to see.

The time has come to hold our waste industry to higher standards in all aspects of their business; and insisting on cleaner trucks and cleaner air is one of the long-overdue, minimal standards we should insist on as a community. Thank you.

MR. ARRONA: Is there anyone else who wishes to testify?

AUDIENCE MEMBER: Good morning, ladies and gentlemen. I am an owner and operator for one single dump truck. And for me, just like the other landscapers, just one truck --we're trying to send our kids to college --this is going to definitely put me out of business. I ask the BIC to consider the small guy with one truck and help us out to keep us in business. This is family owned. That's all we got. We don't run at night.

We don't have a hundred trucks, twenty trucks -- I only have one truck. Thank you.

MR. ARRONA: Anyone else?

REUBEN DESVIGNES: Good morning. My name is Reuben Desvignes. I own one truck. The type of truck I get is like when people call me for garbage, construction garbage and it's very limited. So, I'm really, really, really struggling to survive. So, I'm still trying to understand how to go about retrofitting, because my truck is a 2003. It was a box truck that I converted into a dump truck. It cost me \$15,000 to convert it into a dump truck.

So, working -- for me to get jobs, it's really, really, really difficult in this market. So, what I would like to know -- if I could ask a question, somebody could inform me how to go about getting the truck retrofitted or if it could be retrofitted, or if I have to just condemn it and get a new truck. So, I would like somebody to explain that to me.

And another thing I want to make mention of is -- what about the illegal

trucks that are on the street? We have over three hundred illegal trucks that are operating, picking up garbage. What about them? They're not going to comply. Who's going to see that they comply? I mean, I see them every day. So, how are they complying? They're picking up garbage. They are my competitors. They're competing. So, what about them? And they're also dumping garbage on the street, all over the street, and then some of them are not going into the dump to pay to dump the garbage. So, how are you going to control these types of trucks that are dumping and picking up garbage illegally.

I know they have -- sometimes BIC may hold one and two of the guys, but it's not stopping them. Thank you.

MR. GENEL: My name is Noah Genel. I'm General Counsel at BIC. And so, just with respect to trying to be put in touch with a place that can help retrofit or anything that we can do, Sal Arrona is our director of policy, he will give you his number after the hearing, and then I urge you to call him and discuss what your issues are with respect to

actually getting in touch with somebody who may be able to retrofit your truck.

MR. ARRONA: Any other speakers?

MR. MARTE: Good morning, everyone. Μv name is Georgi Marte. I represent Alpha Waste Solutions. We collect used cooking oil from restaurants all over New York, a small company, about two trucks right now. recently about two, three months ago, I went to Malaya with a VPR or VPS, whatever that is, and it was over \$21,000. Thank God it was a 2014 truck, you're not getting it for that money. I called the manufacturers, I was able to maybe pay 3,000, a little bit over that. So, I can see -- I can relate to, you know, most of you guys here. I could say that the law is great, but we need to look at more alternatives.

For instance, we do used cooking oil, that's bio-diesel. So, you could reduce emissions by a lot, you could look at those. Force everyone to use bio-diesel and you won't have to spend all that money out there. That's a good point to look at for all of you guys. Thank you.

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1	MR. ARRONA: Anyone else who wishes to
2	testify?
3	(No response)
4	MS. SCHNEIDMILL: Thank you, again, to
5	everyone that attended the hearing today,
6	everyone that did give statements. As I said
7	earlier, we will consider all the statements
8	and submissions, and we're not accepting
9	anything else after the end of this hearing.
10	And we are going to close the hearing at this
11	time. It is approximately 11:00 a.m.
12	Thank you so much.
13	(TIME NOTED: 11:00 a.m.)
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1	CERTIFICATE
2	STATE OF NEW YORK)
3	<b>:</b> SS
4	COUNTY OF QUEENS )
5	
6	I, Sabrina Brown Stewart, a Notary Public
7	within and for the State of New York, do hereby
8	certify:
9	That the witness whose examination is
10	hereinbefore set forth was duly sworn and that such
11	an examination is a true record of the testimony
12	given by such a witness.
13	I further certify that I am not related to
14	any of these parties to this action by blood or
15	marriage, and that I am not in any way interested in
16	the outcome of this matter.
17	IN WITNESS WHEREOF, I have hereunto set my
18	hand on this 20th day of June, 2018.
19	
20	
21	Sabrina Brown-Stewart
0.0	Sabrina Brown Stewart
22	
23	
24	
25	

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