



## **APPROVED** STORAGE AND WASTE HAULING, INC.

CT-BMW-027 • DEC PERMIT #3A-476 • NJ DEP #27163 • NYC TWC #0959 • EPA ID #NYR000076513

I am the owner of Approved Storage and Waste Hauling, a commercial and medical waste carting business that has operated in the New York City region since 1996.

Based on my expertise in waste hauling services for health care institutions, I believe the expansion of the Commercial Waste Program (CWZ) to the Bronx East and Bronx West zones is premature. The NYC Department of Sanitation (DSNY) has not addressed a significant oversight affecting the health care sector.

Due to industry practice and safety reasons, all waste generated at health care institutions is handled with unique protocols and care. This is true of general waste from health care sites, not just regulated medical waste. The general waste, or institutional waste, from these facilities should be treated distinctly from general waste and added to the specialized waste classes currently exempt from the program. The continued expansion of CWZ without addressing unintended effects to the bottom lines and operations at health care institutions, many of whom are threatened financially by federal cuts, is ill advised.

DSNY and City government must address this legislatively or through rulemaking before the Bronx zones and others are added to the implementation schedule.

Thank you,

Charles Dippolito, Jr.

May 21, 2025

New York City Department of Sanitation  
599 Maiden Lane  
New York, NY 10038

Dear Acting Commissioner Lojan,

I hope this message finds you well. I am writing in lieu of providing oral testimony at the upcoming May 23, 2025, New York City Department of Sanitation rules hearing regarding the Commercial Waste Zones (CWZ) program. I want to express Montefiore Health System's perspective on the critical implications the program expansion will have on healthcare institutions like ours, particularly as it extends into the Bronx East and West zones.

Montefiore is proud to be one of New York's leading academic health systems, serving over three million people across the Bronx, Westchester, and the Hudson Valley. Our hospitals and outpatient centers are often the primary access points for care in medically underserved communities. In this context, operational efficiency and fiscal responsibility are paramount.

In 2022, Montefiore proactively consolidated waste hauling services across our system, reducing our vendors from seven separate haulers to a single contractor. This decision was grounded in both environmental and financial strategy—aiming to reduce truck traffic, streamline operations, and responsibly manage limited resources as a safety-net provider. The outcome has been significant: improved service coordination, reduced disruption at our facilities, and estimated savings of approximately \$1,000,000 annually.

We are deeply concerned that the CWZ program, in its current form, could jeopardize this progress. While we support the City's goals to improve commercial waste management, we urge you to consider a statutory modification that allows large-scale medical systems to maintain contracts with a single, qualified hauler who understands our complex and regulated waste streams, especially when they are already providing service for exempted waste categories. The healthcare sector's unique operational demands—including infection control, 24/7 operations, and multiple waste classifications—necessitate greater flexibility than a standard commercial entity.

Additionally, we respectfully recommend the establishment of a healthcare and hospital representative on any working group or advisory body convened to evaluate CWZ

implementation. A sector as vital and logistically complex as healthcare must have a voice in shaping policy that directly impacts patient care and operational continuity.

Thank you for considering the critical needs of healthcare institutions as the CWZ program expands. I would welcome the opportunity to speak with the department further on this issue.

Sincerely,

*Jared Shapiro*

Dr. Jared Shapiro DrPH, MPH, CEM, HEM, CBCP, FAcEM, CHSP, CHFM, NRP  
Associate Vice President  
Environmental Health and Safety  
Montefiore Medical System



**Testimony of Alia Soomro, Deputy Director for New York City Policy  
New York League of Conservation Voters  
New York City Department of Sanitation  
Proposed Rule Relating to the Implementation of the  
Second and Third Commercial Waste Zones  
May 23, 2025**

My name is Alia Soomro and I am the Deputy Director for New York City Policy at the New York League of Conservation Voters (NYLCV). NYLCV is a statewide environmental advocacy organization representing over 30,000 members in New York City. Thank you for the opportunity to comment.

NYLCV strongly supported the passage of Local Law 199 of 2019, establishing the City's first Commercial Waste Zones (CWZ) program. Championed by a wide group of stakeholders, this law will overhaul the City's antiquated and inefficient commercial waste management system by dividing the City into 20 zones, limiting each zone to a maximum of three of private sanitation companies selected through a competitive bid process and holding companies to higher standards.

**We are pleased that the first waste zone ("Queens Central") [officially began this January](#), and we support DSNY's proposed rules on the implementation schedule for the Bronx East and Bronx West Commercial Waste Zones (CWZ).** While we understand the importance of starting off on the right foot and learning from Queens Central, it is imperative that the City carries out this law in a timely and transparent manner. **We urge the City to release a list of more CWZs that will be implemented and a firm timeline for when all CWZs will be operational.** We also hope the City will dedicate the requisite amount of resources and funding for staffing, education, and outreach to fully implement the CWZ law.

The CWZ law will bring the city closer to its zero waste goals and improve the safety of workers, pedestrians, and cyclists. It will also cut down on traffic congestion, improve air quality, and curb the city's tailpipe pollution and carbon emissions, which is especially important in low-income communities and communities of color.

We also urge DSNY to continue working towards transitioning to zero-emission vehicles for DSNY and commercial sanitation trucks. Additionally, the City must continue working with DCAS, utility companies, and industry professionals to ensure adequate charging infrastructure is installed and available for sanitation trucks and give extra consideration for CWZ carters with the most aggressive plans to do so. Requiring cleaner fleets as part of the City's move to CWZs is also the best way to bring measurable air quality improvements to neighborhoods that house

a disproportionately high number of haulers and waste processing facilities. It is not good enough to require citywide emissions reductions. We should also strive for more localized benefits.

NYLCV looks forward to seeing the timely implementation of this law citywide so all New Yorkers have the chance to breathe a little easier.

Thank you for the opportunity to comment.