

**OPENING STATEMENT OF
JESSICA STEINBERG ALBIN
SENIOR COUNSEL, BUREAU OF LEGAL AFFAIRS
NEW YORK CITY DEPARTMENT OF SANITATION**

**PUBLIC HEARING ON DSNY'S PROPOSED RULE REGARDING THE RESIDENTIAL
COLLECTION OF DESIGNATED RECYCLABLE MATERIALS TO REQUIRE THE SOURCE
SEPARATION OF ORGANIC WASTE**

**THURSDAY, AUGUST 10, 2023
10:00 A.M.
(REMOTE HEARING)**

Good morning and welcome. My name is Jessica Steinberg Albin. I am Senior Counsel in the Bureau of Legal Affairs for the Department of Sanitation ("DSNY"). 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 regarding the residential collection of designated recyclable materials to require the source separation of organic waste.

This rule was published by DSNY in the City Record on July 10, 2023, with a scheduled hearing date of today, August 10, 2023. 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.

Intro. No. 244-A of 2023, which became law on July 8, 2023 (Local Law 85 of 2023), requires the Department of Sanitation (DSNY) to establish a mandatory citywide organics collection program. This program will make the source separation of residential organic waste in the City of New York mandatory. The law requires DSNY to implement the mandatory organics collection program in 30 residential sanitation districts by October 2, 2023, and all remaining sanitation districts by October 7, 2024. This proposed rule designates such sanitation districts, in accordance with designations made for the source separation of yard waste in rules promulgated earlier this year. The rule also specifies the types of containers in which organic waste must be placed curbside and expands existing requirements related to recyclable materials for residential buildings containing four or more units to apply to organic waste.

In addition to implementing the law's requirements related to mandatory organics collection, this proposed rule implements changes related to yard waste collection made by the law, including extending mandatory yard waste separation requirements year-round, rather than for eight months out of the year. This rule also allows for the use of plastic bags for the disposal of designated yard waste. It clarifies that yard waste cannot be commingled with organics if yard waste is set out in paper or plastic bags. Previously, yard waste was not allowed to be disposed in plastic bags, and there was no rule regulating whether yard waste and organics could be commingled.

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 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@dsny.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 requested 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 state your name and affiliation, and speak slowly and clearly so that the court reporter can understand and accurately record your statement. We also ask that you limit your statement to five minutes.

From: [Andrew Cassilly](#)
To: [NYC Rules \(DSNY\)](#)
Cc: [Suzanna Vaughan](#); [Anna Torpey](#)
Subject: [EXTERNAL] 244-A public comment
Date: Tuesday, August 8, 2023 9:52:39 AM
Attachments: [image001.png](#)

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BioEnergy Devco is very encouraged by the passage of No. 244-A of 2023, which became law in July. This action will help NYC meet its climate mitigation goals. At BioEnergy Devco we are pioneering the development of commercial-scale anaerobic digestion to the US. with our European sister company, BTS Biogas. Together we bring 25 years' experience in the design, construction, engineering, and operation of 250 anaerobic digestion facilities worldwide. We have two recommendations for you to consider as you move forward in your organic waste diversion efforts.

1. To achieve a comprehensive organics diversion plan it is critical that you establish common terminology for use in your rules, regulations, and laws from the start. This will have a tremendous impact on your ability to communicate with all associated parties and make refinements to the program in the coming years. We suggest the use of language that is currently in use in other states such as Maryland.
 - a. **Organics recycling:** Any process of collecting, sorting, and treating designated organic recyclable materials and/or green materials that would have otherwise become solid waste sent to a landfill, and turning them into useful products such as compost, biogas, and other organic Soil Amendments.
 - b. **Organics Recycling Facility:** A **permitted** facility where organics recycling takes place such as composting (aerobic digestion) and anaerobic digestion.
2. Source separation of residential organic waste in the City of New York is critical to maximize its effective recycling into useful materials. Some organic material such as yard waste is an excellent source of carbon for the composting process. However, processing this type of material through anaerobic digestion is not an efficient or cost-effective recycling method.

We believe that achieving the goal of 100% organics diversion from the waste stream will require the use of both composting and anaerobic digestion for organics recycling will be critical for our success. We congratulate you on this move toward environmental sustainability and we welcome an opportunity to serve as an expert resource for the development and operation of your organics recycling program.

Andrew Cassilly

Vice President

Government Relations

bioenergydevco.com

Direct Line: 410-936-0600



From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Additional organic waste requirements
Date: Tuesday, July 18, 2023 10:31:41 AM

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I am a property owner in Manhattan.

I already feel the new hours for putting out garbage for collection unfairly put a tremendous burden on the small property owner and the supers we employ. Instead of being able to sit down with their families after an honest day's work they are forced to stick around or come back to put out garbage at later hours. Rats really don't care if it's 6 p.m. or 8 p.m. This was a misguided and poorly planned change without considering the impact to the small building with a super who lives a commute away.

We can barely get our tenants to recycle properly. We continually deal with pedestrians walking by who casually throw garbage on top of ours.

Recycling is a noble cause and there are sites citizens can go to to drop off if they want to participate. I know the Union Square Farmers Market is one particular option. But to have household waste collected is going to wreak havoc within the apartments, in the basements of buildings and out in the bins on the street. You think we have a rat problem now. Just wait until it feels like a buffet all day, every day.

Noble thought but not practical and in my humble opinion, will make matters so much worse.

Please reconsider this plan.

Best,
Jan Zonon

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Clean NYC Another Way- Compositing others trash is Unsanitary conditions and Exchange of bodily fluids- salvia and etcp
Date: Monday, July 31, 2023 3:48:18 PM

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Dear Sirs/Madams:

As I recall there was a test run of the composting bins in Brooklyn and Parts of Queens several years ago, circa 2017.

The idea was great but the level of participation was low, and the brown bins were removed.

To now attempt to enforce this composting and place the burden on landlords who are already overwhelmed with non paying tenants and a backlogged court system is outrageous.

There are tens of thousands of water bottoms and plastic container to be properly disposed of and environmentally replaced with biodegradable materials.

Do not place more unrealistic pressure on small landlords. Start with teaching the public the benefits of composting and reward New Yorkers with refund points if they bring their perishables to a designated location - where perhaps after 10 visits they receive a gift card for food or plants.

Landlords and homeowners already have to disrupt their dinner and family time to place trash on curb after 8p. Now you expect us to rummage their personal trash and separate God knows what from salvia saturated food leftovers??? UNSANITARY AND UNHEALTHY!!

Figure out another longterm solutions and come up with other plans for a Greener NYC...

Health to You and Yours

I have lyrics to theme "New York, New York" but it appeals to New Yorkers to recycle and take care of Planet Earth...

Contact me directly if interested in starting a campaign to teach composting and recycling.

Regards
Concerned New Yorker

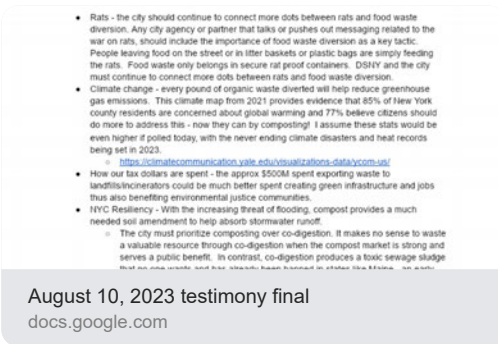
[REDACTED]

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Comments for 8/10 Rules hearing - Source Separation of Residential Organic Waste
Date: Thursday, August 10, 2023 4:06:16 PM
Attachments: [AOD9vFqCCyY7pO6mmGfvrAfsvwOsaiGvRtLMKwMJQzurOzQecOtfOTb4dhqfmOI6cSdbqfmiOTnmBw5fEWxAmoYvZCuZe08h4i7DPEnbaX4_I=w1200-h630-p.png](#)

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Hello-

Here are my comments in a google doc and also pasted below. Not sure if you have a preferred format, but I appreciate this opportunity.



RE: DSNY OPPORTUNITY TO COMMENT ON PROPOSED RULE - REQUIREMENT OF SOURCE SEPARATION OF RESIDENTIAL ORGANIC WASTE

I'm thrilled to see NYC take this tremendous step towards zero waste with the passage of the mandatory organics collection bill #244. I fully support the all SWAB testimony and want to also commend and congratulate the wide ranging team of people that helped make food waste diversion a reality city wide. It's just the first step. So, now we are challenged with convincing 8M+ New Yorkers why they should participate.

New Yorkers have a wide variety of interests and now, with a food waste diversion program, they have a new tool to help them take personal steps to address:

- Rats - the city should continue to connect more dots between rats and food waste diversion. Any city agency or partner that talks or pushes out messaging related to the war on rats, should include the importance of food waste diversion as a key tactic. People leaving food on the street or in litter baskets or plastic bags are simply feeding the rats. Food waste only belongs in secure rat proof containers. DSNY and the city must continue to connect more dots between rats and food waste diversion.
- Climate change - every pound of organic waste diverted will help reduce greenhouse gas emissions. This climate map from 2021 provides evidence that 85% of New York county residents are concerned about global warming and 77% believe citizens should do more to address this - now they can by composting! I assume these stats would be even higher if polled today, with the never ending climate disasters and heat records being set in 2023.

- <https://climatecommunication.yale.edu/visualizations-data/ycom-us/>
- How our tax dollars are spent - the approximate \$500M spent exporting waste to landfills/incinerators could be much better spent creating green infrastructure and jobs thus also benefiting environmental justice communities.
- NYC Resiliency - With the increasing threat of flooding, compost provides a much needed soil amendment to help absorb stormwater runoff.
 - The city must prioritize composting over co-digestion. It makes no sense to waste a valuable resource through co-digestion when the compost market is strong and serves a public benefit. In contrast, co-digestion produces a toxic sewage sludge that no one wants and has already been banned in states like Maine - an early indicator of the future of co-digestion.
 - For these and other reasons, DSNY and the city should continue to fund and protect community composting at and above current levels..

New Yorkers also need additional help and resources to get their building staff and management on board. As exemplified in Queens, a key concern is that residents do not have access to a brown bin. Although building staff may have received a bin, many buildings will not set up and manage the program for residents. At this point Queens residents looking for help should be encouraged to locate a nearby brown bin that is being used and “share a bin”, while additional outreach to building managers is underway.

In response to the implementation plan issued by DSNY Commissioner Tisch, additional clarity is needed on the size of bins people can use to set out organics for collection. It states that residents can use any bin of 55 gallons or less with a secure lid. It might be helpful to stipulate a minimum size.

One bin per household is not going to accommodate larger buildings. That one bin is likely to overflow, creating a mess, providing the disincentive to continue participating in the program. In prior years, buildings could order as many bins as they wanted and that option should continue for the foreseeable future until certain metrics are met.

It would also be very helpful if DSNY would collect and publish more data on NYC Open Data as they canvas door to door seeking participation and feedback as organics rolls out in Brooklyn and other boroughs. The feedback that could be collected as part of door to door outreach is highly valuable and key to driving participation.

Also, a comprehensive analysis of Queens collection data should be provided by community board. This data (for all NYC districts) used to be published monthly online. Having this data would allow us to identify areas that need additional support to increase participation. There are a lot of compost enthusiasts and zero wasters out there. We need to empower and enlist them to help drive participation in their communities by providing this information regularly.

The definition of “designated organics” should be clearly defined. For example, there is great confusion regarding packaging that says (or looks) compostable and if it can go in brown bins or FSDOs. This definition should be consistent with commercial organics. We can reduce contamination by providing more clear

guidelines.

Stickers should also be provided in multiple languages to make it clear that brown bins are not for garbage or dog poop, to reduce contamination.

A plan to phase out use of plastic bags is also needed and should be fast tracked.

Finally, the city should look at any and every occasion to leverage interagency and partner in kind opportunities, to promote organics diversion and composting.

Thank you for this opportunity to provide comments and for bringing food waste diversion to NYC!

Allison Allen

Allison Allen
Member of the Manhattan Solid Waste Advisory Board (MSWAB)
Organics Committee Chair
<https://www.manhattanswab.org/organics>

DON'T DISCARD - DONATE, REUSE, REPAIR & SHARE
<https://www.manhattanswab.org/donate-reuse-repair>

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Indoor recycling of compostables
Date: Tuesday, July 18, 2023 11:03:43 AM

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What are we the owners of small buildings, where tenants are not allowed in the basement due to low ceilings to do?

My building, 100+ years young has no common area that could be used to store these organics.

Are we to hire somebody to collect from our tenants and do what?

You the city gave us very sturdy organic containers for street use. I never saw any rodent marks on them. You the city also gave every tenant a little bucket to keep in their apt. They would and did empty it into the street container you gave us.

Yes we want to do our part. Reasonable accomendations need to be made.

Thank you,
Scott Oskow

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Int 244. Organic recycling
Date: Tuesday, July 18, 2023 6:38:41 PM

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Please provide central collection boxes on each block for your composting initiative. More efficient than each building doing it, better rat control.

WOLF JAKUBOWSKI

Building owner

This e mail is for the named addressees only and may contain confidential information. If you are not the intended recipient, please inform me and delete it from your files. If you do not wish to receive commercial emails from me in the future and like to "Opt-Out" please forward this email to optout@bhsusa.com with subject "remove me from your list." All information is from sources deemed reliable but is subject to errors, omissions, change of price, prior sale or withdrawal without notice. No representation is made as to accuracy of any description. All measurements and square footage are approximate and all information should be confirmed by customer. All rights to content, photographs and graphics reserved to Broker. Broker is not authorized to bind parties. Real estate contracts are only established by duly executed agreement between the parties. *Beware of wire fraud. Never wire funds without telephoning the sender to verify directions.*

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] new inside trash rules / organic waste issues
Date: Wednesday, July 19, 2023 10:01:54 AM

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Excuse my bluntness but this has to be the most ridiculous and fool hearted proposal I've ever hear. This is clearly written or proposed by someone who has never take out trash in nyc or dealt with all the already very strict and out of whack rules in NYC for trash removal. This is a perfect example of someone w book smart but ZERO street smarts. Most small privately owners building already BARELY have enough space for regular trash bins PLUS recycling bins PLUS paper bins etc to add something like this which 90% of small buildings DO NOT HAVE THIS SPACE in their buildings wont even be close to having the space to do something like this. THIS PROPOSAL will 100% bring rats and mice INTO the buildings with the smells etc, bug and mice and flys etc will take ove, there was clearly ZERO thought put into this proposal.

A WAY BETTER idea is my idea which is to get 15 yard containers that can be emptied and unloaded from the side to place a few on EACH block and make people put there trash into these which will contain the trash and keep rats away. The containers will rotate on a sliding scale so they are only in front of one area for a month at a time then move down the block so everyone shares in the burden. I can explain further if neede but this current new rules bringing the waste more inside would be nuts !

Sent from [Mail](#) for Windows

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Note in opposition to requirement of source separation of residential organic waste
Date: Friday, July 28, 2023 9:49:39 AM

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To whom it may concern,

I believe in and support composting. I personally save my compost in my freezer and bring it to the green markets and/or weekly collection at my local train station. However, **I am strongly opposed to mandating it** at all residential buildings.

Many NYC residents struggle with the basics of recycling, I see it all the time at the building my family owns and manages, and at the rental property I live in. While I don't feel it should be the Super's job to properly sort recyclables, it appears to be the case. I think it would be entirely inappropriate and unhealthy/unsanitary for a Super to have to sort food waste. Furthermore, my neighborhood has a significant rat problem – DSNY please focus your attention on that quality of life issue before rolling out a program that will likely exacerbate the existent rodent issues.

On a related note, while I was enthusiastic to see compost bins rolled out on the street corners in my neighborhood, these cans were clearly not designed by anyone who has ever composted! It's a struggle to shimmy the food waste through the small slot, I have witnessed countless episodes of compost spilling while trying to place it in the bin, and the cans are often broken or full and residents then pile their compost next to the bin. This also exacerbates our neighborhood rat issue.

I urge DSNY to focus attention and resources in redesigning and rolling out corner compost cans, expanding train station drop off, green market drop off, etc. before mandating it at residential buildings. Lastly, NYC needs to be fiscally responsible and I'd imagine expanding these strategies would be significantly more cost effective than a mandated city wide curbside compost rollout.

Thank you for your attention to this matter.

Best,
Lucy

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Organic waste collection
Date: Sunday, July 30, 2023 1:44:16 PM

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It is a terrible idea and will cause a multitude of problems if the collections are not 5-7 times per week and even then it is an unpleasant task.

In addition to the hassle of having to bag the waste in one's apartment and keep it for days until the day prior to collection (unless you want to run down to your building's basement every day) and the odors produced by waste food , it will encourage the presence of rats and mice outside

No thanks

Sent from my iPhone

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] proposed composting storage requirements
Date: Wednesday, July 19, 2023 12:03:55 PM

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I have a 5-story, 6-unit brownstone apt. building in Murray Hill in a Landmarked Historical Neighborhood. We already have a rat problem on our street, and this proposed rule would undoubtedly make it worse.

The City's first priority should be to solve the growing rat problem. It is not only a health issue, but reduces property values in the neighborhood, ultimately reducing the City's tax revenue.

Please shelve this ill-considered proposal.

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Proposed organic waste
Date: Tuesday, July 18, 2023 10:57:58 AM

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As a landlord, this would be a tremendous hazard in attracting rats into the building if I have to store the organic waste separately from the regular garbage.

Florence Syskrot

Sent from [Mail](#) for Windows

From: [REDACTED]
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Proposed requirement of separation of organic waste
Date: Tuesday, July 18, 2023 11:51:50 AM

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Hi:

I have never written in opposition of any rule; but I am compelled to do so now as this proposed rule is ridiculous. You cannot have a building as the depository site of organic waste. Having organic waste stored in a building would cause a huge rodent and vermin issue. The only way this would work is to have DSNY do daily pick ups. The brown compost bins that were provided to home owners smell and are not vermin proof. When I lived in a community with private homes these brown containers in the neighborhood were a buffet for rodents and raccoons.

Does the DSNY perform impact studies or better yet have they done an actual case study of the impact on a residential apartment building? NYC owns many NYCHA housing projects perhaps they should do a one year case study and see what the impact is.

BTW - if NYC wanted to cure the rat issue then all garbage should be placed for pick up during daylight hours and at a specific scheduled time.

Mickey

Mickey Napolitano

Senior Vice President

Director of Residential Real Estate

BLDG Management Co., Inc.

417 Fifth Avenue, Fourth Floor

New York, NY 10016-2204

212.624.4356 Direct

212.624.4300 Main

MN@bldg.com

From: [Mark Laster](#)
To: [NYC Rules \(DSNY\)](#)
Subject: [EXTERNAL] Requirement of Source Separation of Residential Organic Waste Testimony
Date: Tuesday, August 8, 2023 10:09:50 AM

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My name is Mark Laster and I am Co-Chair of the Forest Hills Green Team. We run a volunteer food scrap drop off site in Forest Hills, Queens, every Sunday from 10 AM to 1 PM in partnership with Commonpoint Queens; Queens Botanical Gardens and the Big Reuse. Our site is located within blocks of many different coops and large buildings. During the initial voluntary roll out in Queens last year, many of the people who dropped off their food scraps reported none of their buildings were cooperating with this. When the program returned from the pause, we continued to get the same resistance.

We are very excited that the program will now be permanent and mandatory. In speaking to people who continue to come to our site, we have been told that unless the City is able to provide bins to collect the organics, coops and large buildings will still not participate. From our understanding, since Queens was part of the pilot project, we will not even be offered to request additional bins as other boroughs have been allowed to. What was explained to us was with many other financial demands being placed on coops and large buildings, such as implementation of Local Law 97, they do not have a budget to purchase appropriate bins. Combine that with the general resistance against this program and that is why we project the participation will not be great. From our understanding, penalties for non-compliance will not start in the near term.

We hope the City will make bins available for distribution.

Sincerely,

Mark Laster and Dan Miner, Co-Chairs

Forest Hills Green Team

fhgtinc@gmail.com

fhgt.org

<https://www.facebook.com/foresthillsgreenteam>

<https://www.facebook.com/groups/foresthillsgreenteam>

**TESTIMONY TO THE NEW YORK CITY NEW YORK CITY DEPARTMENT OF
SANITATION**

INT 244-A

Position: Favorable

August 10, 2023 Hearing

Clarissa Libertelli

Community Composter Coalition Coordinator, Composting for Community Initiative

Institute for Local Self-Reliance

clarissa@ilsr.org | Brooklyn, NY

On behalf of the Institute for Local Self-Reliance, I am submitting this written testimony in support of the amendment of INT 244-A to require the source separation of organic waste. The diversion of organic waste from landfills and incinerators, where it releases harmful greenhouse gases, is essential for New York City to meet its ambitious zero waste and sustainability goals.

The City has recognized the importance of organics collection in the City Council's [2020 policy paper](#) on adaptation to and mitigation of climate change, which called for an organics recycling mandate, and the NYC Mayor's office's [2021 food policy plan](#), which sets the goal of 90% collection of organic waste by 2030. This rule change would be an important step towards putting those goals into action.

However, in order to be successful, both in terms of public participation and reducing contamination, outreach and education for this program cannot be an afterthought. New Yorkers need to know how to properly separate their organics and why doing so matters so that these new requirements are seen as a solution to their problems—from rodents to climate change—rather than an inconvenience. The involvement of community-oriented, locally-based, and smaller scale composters and compost collection services will be key to successful outreach as community composters have deep knowledge and experience in engaging New Yorkers in the how and why of composting.

In addition, the impact that this new rule will have on the City's climate goals and on improving the lives of New Yorkers will be limited by what happens to organics after they leave the curb. If the majority of material collected is sent to anaerobic digestion facilities rather than being composted, it will be a wasted opportunity to take advantage of compost's potential for carbon sequestration and local soil remediation. Similarly, if organics are sent to industrial composting facilities rather than processed locally, New Yorkers will miss out on the many benefits of community composting, such as local job creation, youth engagement, and greener, more climate resilient neighborhoods.

The City's support for community composting has been a model for other cities across the country, and we hope that the much-needed expansion of organics collection will not come at the expense of local nonprofits and small businesses that have been working in this space for years. We trust that in determining the "how" of expanding organics collection, the city will not lose sight of the "why": to improve the health of the planet and the lives of New Yorkers.



THE COUNCIL OF
THE CITY OF NEW YORK

Shahana Hanif

39TH DISTRICT

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Intergroup Relations

Member of Committee on Mental
Health, Disabilities, and Addictions

Good morning! I'm Council Member Shahana Hanif and I represent the 39th Council District in Brooklyn. I would like to begin by thanking the Department of Sanitation for holding this hearing regarding Local Law 85 of 2023, the Mandatory Residential Organic Composting Law. As the lead sponsor of this law, I am grateful to DSNY for working alongside me, my staff, my fellow Council colleagues, and the countless environmental advocates who worked so hard to get this law across the finish line.

For too long, most New Yorkers have disposed of their organic waste together with their trash, which results in compostable waste being incinerated or left to rot in landfills that are predominantly located in communities of color. Incinerators and landfills emit destructive greenhouse gasses and harm the health of residents. Mandating organic composting is an important step in meeting our City's environmental justice goals.

I am proud that with the full implementation of this law, all New Yorkers will now reap the benefits of organic composting. I commend DSNY for the steps it is taking to roll out this program including by sending mailers, conducting door-to-door outreach, and delivering free brown bins to those who request them.

While I appreciate the Department's efforts to spread awareness of this new law, I would like to raise a few concerns and offer recommendations that would strengthen the program's rollout. First, the October 13th, 2023 deadline to request a brown composting bin will significantly limit the ability of residents to obtain a bin at no cost. This could result in low and middle income New Yorkers needing to purchase their own bins in order to comply with the program. As such, this

deadline should be removed completely. Residents should be able to request a brown bin at any time up to and after April 2025, when civil penalties kick in. We must ensure that our hard-won program is equitable and does not impose undue financial burden.

Additionally, changes should be made to the outreach materials, including the mailer that has been sent out, to clarify that it is mandatory for residents to separate and compost their food waste. Currently, the mailer only specifies that leaves and yard waste must be separated. While penalties do not kick in until April 2025, we must use the next year and a half to build up muscle memory and ensure that residents are properly participating in the program.

Further, I am concerned that DSNY does not yet have translated outreach materials. Outreach will be ineffective if it is not in the languages that New Yorkers understand. Door-to-door efforts and mailed materials should be directly informed by the language and cultural needs of each of our City's unique neighborhoods. The Department's implementation plan states that outreach will occur in 14 languages, and I expect that the Department will follow through with this commitment and collaborate with the local Council Member and community partners.

Lastly, the Department should create an Outreach Toolkit that volunteers can use to help get the word out to neighborhoods. We are privileged to have many informed and enthusiastic community members who are eager to support the Department's efforts. These folks know their own neighborhoods best and are a critical resource in our efforts for successful participation.

I look forward to continuing to work with the Department to ensure that the implementation of mandatory residential composting is efficient and inclusive. Thank you for your time and consideration. I would also like to thank my Legislative and Budget Interns Savannah Jackson and Ryan Alwi for their work in preparing this testimony.

N Y L P I

**JUSTICE THROUGH
COMMUNITY POWER**

**Comments Submitted by Justin Wood, Director of Policy of
New York Lawyers for the Public Interest
to the New York City Department of Sanitation
on August 10, 2023
in Support of Rules Requiring Source Separation of Organic Waste**

New York Lawyers for the Public Interest (NYLPI) shares the following recommendations regarding the Department of Sanitation's request for testimony concerning the collection and source-separation of residential organic waste.

Local Law 85 of 2023 now requires the Department of Sanitation (DSNY) to develop outreach and education materials to inform residents about the program and instruct residents on how to properly source-separate organic waste from refuse and recyclables.

NYLPI strongly supports this proposed rule change, and the accompanying expansion of curbside organic waste recycling citywide as mandated by the law, and offer the following recommendations to maximize participation and reductions of greenhouse gas emissions from waste, and reduce local emission and safety hazards in communities near waste processing facilities:

Public Education

The simultaneous implementation of curbside organic waste recycling mandated by Local Law 85 of 2023 and the transition to a commercial waste zone system mandated by Local Law 199 of 2019 creates a major opportunity to synchronize, coordinate, and rationalize recycling practices and messaging across the residential and commercial sectors.

We urge DSNY to plan and execute far-reaching public education campaigns to ensure that building owners, homeowners, business owners, customers of commercial establishments, and employees of any business receive consistent and accessible messaging and education on how to properly recycle organic food and yard waste and how to reduce waste in New Yorkers' homes, workplaces, public spaces, and commercial establishments.

We also urge DSNY to ensure that enforcement of both residential and commercial recycling rule is consistent, equitable, and that such enforcement creates strong incentives for building owners, property managers, businesses, and commercial waste haulers to invest in and commit to source-separation and waste reduction programs involving tenants and customers.

Processing Capacity and Waste Equity

While NYLPI applauds DSNY's commitment to a citywide curbside organics collection program, we call on the Department to ensure that increased use of both wastewater treatment facilities and private transfer stations to process recyclable organic material do not undermine the letter or the spirit of the Waste Equity Law (Local Law 152 of 2018) nor the environmental justice goals of Local Law 199 and the 2006 Solid Waste Management Plan.

To that end, we recommend that processing of source-separated organics prioritize local and regional composting solutions over anaerobic digestion and anaerobic co-digestion in processing. We further recommend that the City take steps to make residential and commercial compost collection as efficient as possible, and to avoid any increases to truck traffic in overburdened communities, including:

- Preserving and expanding local composting capacity in numerous sites across the City including parks and City-owned sites;
- Exploring the utilization of City-owned marine transfer stations to process both commercial refuse and residential source-separated organics; and
- Using micro-haulers and zero-emissions vehicles to collect and consolidate organic waste for local processing.

Waste Reduction and Food Donation

Finally, while curbside collection and recycling of food waste is environmentally far preferable to disposal, source reduction of food waste is the best way to reduce greenhouse gas emissions and help address food insecurity in our City.

In concert with the public education campaign mandated by Local Law 85 of 2023, we urge DSNY to support rapid expansion of food donation and food rescue services so that retail stores, restaurants, and individuals can easily donate unused or expiring food products in every community.

Thank you for the opportunity to comment on this exciting program and these proposed rule changes. We look forward to working with DSNY to implement these critical Zero Waste policies.

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About New York Lawyers for the Public Interest

Founded more than 45 years ago by leaders of the bar, New York Lawyers for the Public Interest (NYLPI) is a community-driven civil rights organization that pursues justice for all New Yorkers. NYLPI works toward a New York where all people can thrive in their communities, with quality healthcare and housing, safe jobs, good schools, and healthy neighborhoods. In NYLPI's vision, all New Yorkers live with dignity and independence, with the resources they need to succeed. NYLPI's community-driven approach powers its commitments to civil rights and to disability, health, immigrant, and environmental justice. NYLPI seeks lasting change through litigation, community organizing, policy advocacy, pro bono service, and education.

August 10, 2023

Comments regarding proposed rules regarding Implementation of Local Law 35 (of 2023)

Thank you for the opportunity to submit these comments for consideration as the Department of Sanitation implements Local Law 35 (of 2023); they represent my personal and professional perspective based on over 30 years of direct experience on the challenges of managing organic wastes as resources, especially the effective diversion, collection and processing of food wastes (residential and commercial), and not that of any company, institution or organization. (Affiliations noted at the end.)

My initial comment is about the process and timing of this regulation, followed by comments about the substance – both what is included and what is missing.

At the outset, and to be bold, the proposed regulation is premature and unnecessary and should be withdrawn pending further consideration. LL35 requires that DSNY produce a comprehensive plan that supports its full implementation. While an initial “plan” has been produced, it is simplistic and general, and lacks full and detailed information about a wide range of essential considerations that ultimately will affect the implementation of this new requirement and its success or failure. And it has not yet been subject to public discussion.

Notably lacking is information about what materials are designated (see below), how set-out and collection practices will be implemented, and the locations, capabilities and capacity of the necessary facilities to receive and process what is collected.

Many of those concerns were noted in the oral testimony received at today’s hearing, and underscore the need for careful and thoughtful planning, especially about outreach and education. Otherwise, the regulatory scheme will fail to benefit from evaluation of what works, and doesn’t, in the initial rollout, and the inevitable need for mid-course corrections, e.g., types of bags, etc., will confuse the public.

When California adopted SB1383 – its statewide mandatory organics diversion law - its implementation process spawned over five years of local planning, facility development and other essential elements; NYC’s attempt to fast-track – or avoid - such a comprehensive planning process will undermine its successful implementation. Even in this first year of full implementation, CalRecycle regularly holds workshops to share information among its towns and cities.

Of particular interest: in my considerable experience working with major cities in Canada on similar programs and systems, they reverse the process used by DSNY. The cities first conduct extensive and intensive stakeholder engagement, often “workshopping” concerns, ideas and solutions about planning for a new system.

This stakeholder engagement process builds consensus *before* bylaws and regulations are drafted and adopted, and clearly outlines investment requirements, education and outreach initiatives, and essential public messaging about effective compliance.

Such a model for stakeholder engagement is in current use by the Department of City Planning for educating the public about its three proposed *City of Yes* zoning amendments.

As to timing, nothing in the proposed regulation is timely or urgent, and it can be withdrawn and postponed until further engagement and consensus is reached. Given that enforcement via violations will not occur until at least April 2025, delaying this regulation would allow for further deliberation, testing and evaluation of in-the-field implementation to inform what will become the basis for enforcement.

That is especially true regarding my next recommendation that full consideration be given to a comprehensive definition of what constitutes organic waste – as it is that definition that will become the subject for regulation and compliance. Until a full suite of processing facilities and options are determined, it is nearly impossible to clearly identify what materials are designated for diversion – or not.

A sampling of organics program outreach and education flyers from other cities underscores that challenge; while 90% of what’s designated are universal, some key differences can be noted, and can only be reconciled by first determining the methods of processing that the city will utilize. Key examples are dairy and meat products, and animal/pet and human waste (e.g., personal care products). Whether “soiled papers” should be included, or not, is another example; they add no nutritional content to compost, nor energy potential for biogas production.

And as noted in the oral comments, the debate over whether or not organics processing systems can tolerate various types of “compostable” products – food serviceware, bags, etc. – is nearing resolution, and needs careful attention.

A further comment with respect to the emerging debate over the environmental efficacy of anaerobic digestion (AD) and co-digestion vs. conventional forms of composting. This is a complex subject that appears to require further exploration – and in the words of Councilmember Sandra Nurse – a “learning journey.”

To date, little recognition has been given to the innate difference between organic wastes and other non-putrescible elements of the municipal wastestream (e.g., metals, glass and plastics); that key difference is water – food averages 70% water content (like human bodies), with fruits and vegetables exceeding 90%. That water content contributes to their putrescibility – the rapid and uncontrolled degradation of organic materials into water and other products. Codigestion and AD, especially at existing water resource recovery facilities in addition to stand-alone merchant or farm-based facilities, are rapidly becoming the norm, because they regularize that process with advanced technology focused on both the processes and the end-products.

AD-focused systems – common throughout Europe – first regard food waste for its energy potential – the same purpose that food serves for humans – with AD as the means for capturing that potential for beneficial use, whether in our stomachs or elsewhere. Whatever solids remain suitable for processing (AD systems are improving to increase biogas production and reduce remaining solids) – and in some cases co-composting with green materials – for beneficial use for both food-producing and land reclamation purposes.

Beneficial use of so-called biosolids is national, state and local policy (included in the city's own Solid Waste Management Plans in 1992 and 2006) since ocean-dumping of sewage sludge ceased – in 1992, by NYC, is highly regulated, and recently affirmed by the State's Climate Action Plan.

The proposed regulation unfortunately continues the city's focus on truck-based solutions, adding dozens of additional trucks to the city's streets. Instead, attention should be refocused on both food waste reduction and prevention strategies – proven to reduce the generation of food waste by as much as 20% - and existing and emerging technologies that serve similar purposes of reducing what's disposed of, and converting wastes into resources.

Finally, LL35, the initial Plan, and this proposed regulation pay little attention to the overarching goal of reducing greenhouse gas emissions, as no such evaluation of options has been done. It, however, will be a part of the inter-agency study of organics management strategies, which also will serve to inform how best both residential and commercial/industrial organic resources are dealt with.

Whether or not my suggestion for withdrawal and reconsideration is adopted, DSNY should attempt to develop an effective stakeholder engagement process that learns from, guides and supports the overall implementation of LL35.

Thank you for your consideration.

Respectfully submitted to nycrules@dshny.nyc.gov

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The writer is founding Assistant Director of DSNY's Recycling system (circa 1989); former Chair, Citywide Recycling Advisory Board; 30-year member of the Brooklyn Solid Waste Advisory Board; industry consultant with experience locally, regionally and across the U.S.; active member of the New York State Organics Counsel and various other industry associations related to organics. His long-time engagement on behalf of InSinkErator, the world's leading manufacturer of food waste processing devices and systems, has since 2017 solely focused on Canada. He also is an executive-in-residence at the NYU Stern Center for Sustainable Business.



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
NYC Department of Sanitation Proposed Rule Relating to Mandatory Organics
August 10, 2023**

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. I would like to thank the New York City Department of Sanitation (DSNY) for the opportunity to comment.

NYLCV is a firm supporter of DSNY's proposed rule relating to a mandatory organics program having advocated for the passage of Intro No. 244-A of 2023, a local law establishing a citywide mandatory organics collection. This proposed rule designates the timeline of residential sanitation districts the organics program will target, the types of containers in which organic waste must be placed, and changes related to yard waste collection so that it becomes year-round, rather than for eight months out of the year.

Achieving zero waste by 2030 has been one of NYLCV's top policy priorities and establishing a comprehensive mandatory residential organics collection system for New York City is an important way to achieve this goal. Organic waste, including yard waste, makes up approximately a third of our residential waste. When sent to landfills, organic waste decomposes to create methane gas, a powerful greenhouse gas more than 20 times more potent than carbon dioxide. This program will help the City reduce waste sent to landfills, reduce greenhouse gas emissions, and improve existing environmental inequities. Neighborhoods near polluting facilities like waste transfer stations and incinerators, most often low income and communities of color, are the ones whose health could most benefit by recycling organic waste. The higher rates of pollution in these communities cause disproportionately higher cases of asthma, cancer, and other health issues and compound existing environmental and racial inequities. Lastly, diverting as much waste as possible from landfills will further New York State's climate goals.

NYLCV supports this proposed rule because it will help the City fight climate change, improve public health, and further environmental justice. We appreciate DSNY's efforts to move the City towards zero waste by 2030 and we look forward to working with DSNY as the City continues to roll out its mandatory organics program.

Thank you for the opportunity to comment.



RENT STABILIZATION ASSOCIATION COMMENTS ON PROPOSED RULES FOR
RESIDENTIAL ORGANIC WASTE SOURCE SEPARATION

August 10, 2023

The Rent Stabilization Association of New York City represents 25,000 diverse owners and managers who collectively manage more than one million apartments in every neighborhood and community throughout the city. We thank the Department for giving us the opportunity to submit these comments on proposed changes to Section 1-08 of Title 16 of the Rules of the City of New York to implement Local Law 85 of 2023 that deals with organic waste separation.

The proposed rule requires residential buildings to begin separate collection of organic waste according to a phase-in schedule by borough set to begin immediately in Queens, with the other boroughs entering the program at various dates to be fully implemented by October 7, 2024. This program would require designated storage areas to be established inside buildings with the owner ultimately responsible for the sorting of organic waste for collection.

This creates a host of issues, but most alarming is the requirement that buildings serve as the repository for food waste during extended periods between sanitation collections. As the city undertakes a wide-scale rat mitigation program, to require organics to be stored for special pick-ups inside residential buildings will only invite this rat crisis indoors. Since the city has identified trash build-up as a major source of the city's rat infestation, it should not be requiring food waste to be diverted from the regular pick-up schedule occurring multiple times per week to specialized pick-ups. It should be collected as frequently as possible and as expeditiously as possible and not left to languish for any period.

In addition to fostering the potential for vermin, this will require buildings, most with very limited public spaces, to dedicate separate containers for organic materials. Many struggle to find the space for the separation required already, this will just serve to make things more complicated by adding yet another bin to the mix.

It also places ultimate responsibility on owners for tenants' acts. As there has been zero education campaign to date, to begin implementation immediately will cause undue burdens on those being held responsible. Buildings are still adapting staffing schedules to meet the recently-adjusted trash pick-up schedules; this will require additional hours focused on trash sorting and mean additional costs for owners both in manpower and fines.

For these reasons the RSA opposes the Proposed Amendments to Section 1-08 of Title 16.

Mandatory Curbside Composting Implementation Plan, required pursuant to Local Law 85 of 2023

The SaveOurCompost (SOC) coalition advocates for organic waste recycling as a free, public service for all residents of New York City and would like to submit testimony about the implementation of mandatory curbside collection of organics.

The proposed rule specifies that yard waste needs to be set out separate from food scraps and soiled paper, and allows the use of plastic bags to do so. We would like to recommend that the department allow both plastic or paper yard bags for the collection of yard waste. Paper yard waste bags would readily compost and save on processing costs, while avoiding the negative impacts of plastic production and pollution. Could the Department clarify whether yard waste will be collected separately from other organics, since they are not allowed to be comingled anymore, or so it could be inferred from section (1) Rigid containers section (iii) and (iv).

Rigid containers:

Organic waste containers of up to 55 gallons in capacity are allowed to be used, however a 55 gallon container filled with food scraps can weigh up to 250 pounds and will be very unwieldy and strenuous for a sanitation employee to lift and empty into a sanitation truck. We are concerned that lifting hundreds, or potentially thousands, of these bins during one shift might lead to injuries for sanitation workers. To protect sanitation workers, we urge DSNY to use mechanized trucks that can pickup large containers of organics, especially in high density neighborhoods.

Bin Distribution

DSNY is currently only giving one brown bin for each building. This means that a single-family brownstone will receive a single bin and an apartment building with hundreds of units will also receive a single bin. We think this is insufficient and will be a barrier for apartment buildings to participate. We suggest that DSNY provide, *at the very least*, one bin per 50 units. Additionally, bins should be made available on an ongoing basis to remove barriers to participation.

Outreach and Education Program

The success of the curbside composting program is dependent on participation and effective outreach and education on composting. The Department should utilize the network of organizations who have done compost education in NYC since the inception of the NYC Compost Project since 1993. Currently, the budget for the NYC Compost Project is slated to be reduced from \$7 Mill to a mere \$3.5 Mill by FY26. There needs to be a sustained, community based approach to Outreach and Education to make this program a success. As we see from the participation and diversion rates for metal/glass/plastic and paper recycling New Yorkers do not participate at sufficient levels. The rollout of curbside composting is an opportunity to do better!

Processing

We applaud that DSNY is developing RFP to expand processing capacity, and would like to request that a significant portion of the organics be processed locally, from community based registered facilities to larger commercial facilities, to create compost as a soil amendment. This approach will create a circular system which has additional environmental benefits: compost improves urban soils, which allows capture of stormwater runoff, helps street trees and green open space to thrive, which provides shade and clean air, and creates local green jobs.



The Manhattan, Brooklyn, Queens and Bronx Solid Waste Advisory Boards (SWABs) share the following recommendations regarding the Department of Sanitation's request for testimony concerning the collection and "source-separation of organic waste."

The notice for testimony refers to INTRO 244-A, which became law on July 8, 2023. This law requires the Department of Sanitation to develop outreach and education materials to inform residents about the program and instruct residents on how to properly source-separate the organic waste (to be defined as "source-separated organics" by the rule change).

The SWABs agree with the DSNY's proposed rule changes. However, though the allowance for plastic bags should not be prohibited at this early stage of the program in order to encourage participation, we believe that the use of plastic bags should be phased out through outreach and education to minimize environmental and health impacts.

The SWABs believe that organics diversion, collection, and processing must be executed in a way that maximizes participation and minimizes environmental and health impacts. We view the proposed rule changes through this lens.

Participation through Outreach and Education: As source-separated organics are now part of the recycling category, a commitment to sustained outreach and education to support and increase participation is needed in both organics and recycling diversion. Any organics diversion plan must, as its central principle, increase participation through incentives of convenience. Substituting trash collection days with organics and recycling collection days (as is done in the Department of Education) will both increase convenience and encourage participation. As trash pickup days decrease, residents will rely on other streams for diversion. Similarly, as residents increase organics diversion from their trash bins, there will be a commensurate decrease in the amount of landfill- and incineration-bound trash. To ensure that residents participate in the organics separation, we recommend that DSNY provide at least one bin per 50 apartment units. In addition, to ensure buildings have enough time to request bins, we recommend that DSNY allow buildings to order bins at any point during the first month of organics collection.

We encourage all outreach and education to create awareness, increase comprehension and motivation, take into account attitudes towards recycling and intention to participate, be convenient, and maintain participation behavior over time.¹ Outreach campaigns should be long-standing, always changing, and attention-grabbing and should include ads in subways, buses, and LinkNYC kiosks, billboards, TV and radio, ConEd bulletins, in short, wherever New Yorkers may see them. Additionally curbside and kitchen bin distribution are key motivators. DSNY outreach should leverage the resources and work of the Department of Education in the area of participation and waste diversion in schools.

Processing: SWABs recommend that processing of source-separated organics should prioritize composting solutions over anaerobic digestion and anaerobic co-digestion in processing. "Composting sequesters carbon, emits less greenhouse gas and produces a product that can be used to enrich our soil, often reducing the need for artificial fertilizers made from fossil fuels – further reducing greenhouse gas emissions. Co-digestion of organics produces leaky methane, carbon dioxide and produces a byproduct of sewage sludge – which is often contaminated with plastics, PFAS, powerful pharmaceuticals, and other toxins, all contaminants that can not be effectively mitigated by treatment processes."² As such, DSNY should preserve and expand local composting processing capacity for and usage of organics compost within the five boroughs in addition to forging partnerships with local accessible vineyards and farms that might have interest and land for composting NYC organics for local application.

There is no time to waste in implementing these proven, cost-effective waste-diverting solutions.

¹ See [Increasing Participation in Zero Waste programs in New York City.pdf](#)

² See [All-SWABs' recommendations for NYC organics processing](#)

The Manhattan, Brooklyn, Queens and Bronx Solid Waste Advisory Boards (SWABs) statement on PlaNYC proposed co-digestion solutions for processing the city's residential and commercial organics streams

The Manhattan, Brooklyn, Queens and Bronx Solid Waste Advisory Boards (SWABs) recommend that the City prioritize composting solutions over the current [PlaNYC](#) proposed co-digestion solutions for processing the city's residential and commercial organics streams.

Composting of food scraps has many important advantages over co-digestion.

Composting sequesters carbon, emits less greenhouse gas and produces a product that can be used to enrich our soil, often reducing the need for artificial fertilizers made from fossil fuels – further reducing greenhouse gas emissions.

In contrast to composting, co-digestion of organics produces methane, carbon dioxide and produces a byproduct of sewage sludge – which is often contaminated with plastics, PFAS, powerful pharmaceuticals, and other toxins, all contaminants that can not be effectively mitigated by treatment processes.

According to the EPA, “To date, 739 chemicals have been found” in various samples of sewage sludge, many of which are known toxins. A list of these is attached to this document for your reference.

Sewage sludge is a poor candidate for application as a fertilizer (56% of sewage sludge is landfilled or incinerated) because many of the chemicals that can be found in it are not only toxic to humans, animals and plants but are also forever chemicals that never go away but accumulate over time. This is why the majority of sewage sludge produced in New York City must be moved out of the city [by rail](#) and truck to be landfilled or burned.³

Additionally, anaerobic co-digestion of organics converts nutrients normally found in organic material into methane that when burned is converted into carbon dioxide. Often in the transportation and distribution of methane a portion of it leaks into the atmosphere where it has a 28 times greater impact on atmospheric warming than CO₂.

Co-digestion, if it were to become the primary means of processing our city's organics, would be detrimental to our responsible waste management efforts in New York City and damaging to the health and well-being of the citizens of New York City, New York State, and the planet.

It is for these reasons that the Manhattan, Brooklyn, Queens and Bronx Solid Waste Advisory Boards (SWABs) recommend that the City prioritize composting solutions over the current PlaNYC proposed co-digestion solutions for processing the city's residential and commercial organics streams.

³<https://www.epa.gov/system/files/styles/large/private/images/2021-07/biosolids-use-disposal-potws-2019.png?itok=FbNe4iKp>

Appendix 1 EPA: LIST Chemicals in biosolids (2022)

(2-Butyl-4-chloro-1-[[2'-(1H-tetrazol-5-yl)[1,1'-biphenyl]-4-yl]methyl]-1H-imidazol-5-yl)methanol • (2E)-4-(Dimethylamino)-4-oxobut-2-en-2-yl dimethyl phosphate • 2,4-Di-tert-butylphenyl 3,5-di-tert-butyl-4-hydroxybenzoate • 4,4'-Methylenebis(2,6-di-tert-butylphenol) • [(2R,3R,4E,6E,9R,11R,12S,13S,14R)-12-[[3,6-Dideoxy-4-O-(2,6-dideoxy-3-C-methyl-alpha-L-ribo-hexopyranosyl)-3-(dimethylamino)-beta-D-glucopyranosyl]oxy]-2-ethyl-14-hydroxy-5,9,13-trimethyl-8,16-dioxo-1-(2-oxoethyl)-1-oxacyclohexadeca-4,6-dien-3-yl]methyl 6-deoxy-2,3-di-O-methyl-beta-D-allopyranoside • (3R,4S,5S,6R,7R,9R,11R,12R,13S,14R)-6-[[[(2S,3R,4S,6R)-4-(Dimethylamino)-3-hydroxy-6-methyl-2-yl]oxy]-14-ethyl-7,12,13-trihydroxy-4-[[[(2R,4R,5S,6S)-5-hydroxy-4-methoxy-4,6-dimethyl-2-yl]oxy]-3, 5,7,9,11,13-hexamethyl-1-oxacyclotetradecane-2,10-dione (non-preferred name) • 1,2,3,4,6,7,8-Heptabromooxanthrene • 3-Hydroxyestra-1,3,5(10),7-tetraen-17-one • 8-Chloro-1-methyl-6-phenyl-4H-[1,2,4]triazolo[4,3-a][1,4]benzodiazepine • 2,3,3',4,5',6-Hexachloro-1,1'-biphenyl • 3-Ethyl 5-methyl 2-[(2-aminoethoxy)methyl]-4-(2-chlorophenyl)-6-methyl-1,4-dihydropyridine-3,5-dicarboxylate • 2,2',3,4,4',6,6'-Heptachloro-1,1'-biphenyl • Tetrachloromethane • 1,2,3,4,6,7,8,9-Octachlorodibenzo[b,d]furan • 2,2',3,4,6'-Pentachloro-1,1'-biphenyl • Docosane • 1,1'-(2,2,2-Trichloroethane-1,1-diyl)bis(4-chlorobenzene) • Antimony • 1,3,5-Triazine-2,4,6-triol • Cholesta-5,24-dien-3beta-ol • (1R,3r,5S)-3-(Diphenylmethoxy)-8-methyl-8-azabicyclo[3.2.1]octane • 2,2',4,5'-Tetrachloro-1,1'-biphenyl • 2,2',3,3',4,5,5'-Heptachloro-1,1'-biphenyl • 2,2',3,3',4,5-Hexachloro-1,1'-biphenyl • 2,3,4'-Trichloro-1,1'-biphenyl • Calcium • Silver • 2,2',3,3',4,4',5,6,6'-Nonachloro-1,1'-biphenyl • 1,2-Dihydroacenaphthylene • 4-Amino-N-(5-methyl-1,2-oxazol-3-yl)benzene-1-sulfonamide • 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-Henicosafuorododecyl 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl hydrogenato phosphate • Dibutyl hydrogen phosphate • O,O-Diethyl O-[6-methyl-2-(propan-2-yl)pyrimidin-4-yl] phosphorothioate • 2,2'-(Ethane-1,1-diyl)bis(4,6-di-tert-butylphenol) • 2,2',4-Trichloro-1,1'-biphenyl • 2,2',3,3',6,6'-Hexachloro-1,1'-biphenyl • N-Phenylaniline • 1,2,3,4,7,8,9-Heptabromodibenzo[b,d]furan • 1,2,3,7,8,9-Hexachlorooxanthrene • 2,3,3',4,4',5-Hexachloro-1,1'-biphenyl • O,O-Dimethyl S-[2-(methylamino)-2-oxoethyl] phosphorodithioate • Sodium • But-2-enal • 2-(Diphenylmethoxy)-N,N-dimethylethan-1-amine • 4-Nitrophenol • Methanedithione • 4-(Butan-2-yl)-2,6-di-tert-butylphenol • 2,2',4,4',5,5'-Hexabromo-1,1'-biphenyl • 2,2',3,6'-Tetrachloro-1,1'-biphenyl • 5beta-Cholestan-3alpha-ol • 3,3',4,5,5'-Pentachloro-1,1'-biphenyl • 2,2',3,4-Tetrachloro-1,1'-biphenyl • 2,2',3,3',4,5,6,6'-Octachloro-1,1'-biphenyl • 1,3-Xylene • Benzyl 4-hydroxybenzoate • 2,4,4',6-Tetrachloro-1,1'-biphenyl • 4-Amino-N-(4,6-dimethylpyrimidin-2-yl)benzene-1-sulfonamide • 2,3',4,6-Tetrachloro-1,1'-biphenyl • 2,2',3,5,6,6'-Hexachloro-1,1'-biphenyl • 2,2',5,6'-Tetrachloro-1,1'-biphenyl • 1,1'-[Ethane-1,2-diylbis(oxy)]bis(2,4,6-tribromobenzene) • 2,2',4,4'-Tetrachloro-1,1'-biphenyl • 1,2,3,7,8-Pentachlorooxanthrene • 4,4'-(Propane-2,2-diyl)diphenol • 1-(4-tert-Butyl-2,6-dimethyl-3,5-dinitrophenyl)ethan-1-one • 2,3,5,6-Tetrachloro-1,1'-biphenyl • 1,1'-Oxybis(pentabromobenzene) • Silicon • 1-Cyclopropyl-6-fluoro-4-oxo-7-(piperazin-1-yl)-1,4-dihydroquinoline-3-carboxylic acid • Sulfur • (9R)-6'-Methoxy-8alpha-cinchonan-9-ol • Anthracene • 2,2',3,4,5',6-Hexachloro-1,1'-biphenyl • 2,2',3,4',6,6'-Hexachloro-1,1'-biphenyl • 1,2,3,4,7,8-Hexabromooxanthrene • 4-(2,4,4-Trimethylpentan-2-yl)phenol • 2,3,3',4',5,6-Hexachloro-1,1'-biphenyl • 2,6-Dinitro-N,N-dipropyl-4-(trifluoromethyl)aniline • 2,3',4,4'-Tetrachloro-1,1'-biphenyl • Trichloro(fluoro)methane • 5-Amino-1-[2,6-dichloro-4-(trifluoromethyl)phenyl]-4-(trifluoromethanesulfinyl)-1H-pyrazole-3-carboxamide • N-(1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-Heptadecafluorooctane-1-sulfonyl)-N-methylglycine • Bis(2-methylpropyl) hydrogen phosphate • Tris(2-butoxyethyl) phosphate • Mercury • (2S,3S)-5-[2-(Dimethylamino)ethyl]-2-(4-methoxyphenyl)-4-oxo-2,3,4,5-tetrahydro-1,5-benzothiazepin-3-yl acetate • 2,3,3',5,5',6-Hexachloro-1,1'-biphenyl • 1,2,3,7,8-Pentachlorodibenzo[b,d]furan • Beryllium • (5aR,6S,9S,9aS)-6,7,8,9,10,10-Hexachloro-1,5,5a,6,9,9a-hexahydro-3H-6,9-methano-3lambda~4~-2,4,3lambda~4~-benzodioxathiepin-3-one • 2,4,6-Trichloro-1,1'-biphenyl • Benzene • 3,4-Dichloro-1,1'-biphenyl • Tris(2-methylpropyl) phosphate • 1-(2H-1,3-Benzodioxol-5-yl)-N-methylpropan-2-amine • (1S,4S)-4-(3,4-Dichlorophenyl)-N-methyl-1,2,3,4-tetrahydronaphthalen-1-amine • 2,2',3-Trichloro-1,1'-biphenyl • Yttrium • 1,1,1-Trichloroethane • 2-(2,4,5-Trichlorophenoxy)propanoic acid • Ethenylbenzene • Heptadecafluorononanoic acid • 4,6-Diamino-1,3,5-triazin-2(1H)-one • 2,2',3,4,5,5',6-Heptachloro-1,1'-biphenyl • 1,2,3,7,8-Pentabromodibenzo[b,d]furan • Propyl 4-hydroxybenzoate • Cobalt • 2,3,4,5,6-Pentachloro-1,1'-biphenyl • (4S,4aS,5aS,6S,12aS)-4-(Dimethylamino)-3,6,10,12,12a-pentahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide • 7-Chloro-1-methyl-5-phenyl-1,3-dihydro-2H-1,4-benzodiazepin-2-one • 2,2',3,4,4',5-Hexachloro-1,1'-biphenyl • 2,3,4,4',6-Pentachloro-1,1'-biphenyl • 2-(4-{2-Hydroxy-3-[(propan-2-yl)amino]propoxy}phenyl)acetamide • Magnesium • 1,2,3-Trichlorobenzene • 2,2',3,3',5,5',6,6'-Octachloro-1,1'-biphenyl • 6-(Dimethylamino)-4,4-diphenylheptan-3-one • Methyl (2E)-2-[(1,4-dioxo-1lambda~5~-4lambda~5~-quinoxalin-2-yl)methylidene]hydrazine-1-carboxylate • 5-Chloro-2-(2,4-dichlorophenoxy)phenol • Aluminium • Iodine • 5-[3-(tert-Butylamino)-2-hydroxypropoxy]-1,2,3,4-tetrahydronaphthalene-2,3-diol • 2,2',3,4,4',5'-Hexachloro-1,1'-biphenyl • 2,3,3',4,6-Pentachloro-1,1'-biphenyl • Thallium • (4S,4aS,12aS)-4-(Dimethylamino)-3,10,11,12a-tetrahydroxy-6-methyl-1,12-dioxo-1,4,4a,5,12,12a-hexahydrotetracene-2-carboxamide • (4S,4aS,6S,8aS)-6-[(1S)-7-Chloro-4-hydroxy-1-methyl-3-oxo-1,3-dihydro-2-benzofuran-1-yl]-4-(dimethylamino)-3,8a-dihydroxy-1,8-dioxo-1,4

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,4a,5,6,7,8,8a-octahydronaphthalene-2-carboxamide • 2,2'-(Ethane-1,2-diyl)bis(5-aminobenzene-1-sulfonic acid) • 3,3',4,5-Tetrachloro-1,1'-biphenyl • N,N-Dibutylnitrous amide • 3-Chloro-4-(diethylamino)-4-oxobut-2-en-2-yl dimethyl phosphate • 2,4-Bis(2-methylbutan-2-yl)phenol • 2,2',3,4,4',6-Hexachloro-1,1'-biphenyl • Bis(1-chloropropan-2-yl) hydrogen phosphate • Cholest-5-en-3beta-ol • (2S)-N-Methyl-1-phenylpropan-2-amine • Estra-1(10),2,4-triene-3,17beta-diol • Estra-1,3,5(10),7-tetraene-3,17alpha-diol • 2,3,4,7,8-Pentabromodibenzo[b,d]furan • (4S,4aS,5aS,6S,12aS)-7-Chloro-4-(dimethylamino)-3,6,10,12,12a-pentahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide • Methyl 3,4-dihydroxybenzoate • rel-(1aR,2R,2aS,6R,6aR,7S,7aS)-3,4,5,6,9,9-Hexachloro-1a,2,2a,3,6,6a,7,7a-octahydro-2,7:3,6-dimethanonaphtho[2,3-b]oxirene • 2,4-Dichloro-1-(4-nitrophenoxy)benzene • 2,2',3,4',5,5',6-Heptachloro-1,1'-biphenyl • 5-(2,5-Dimethylphenoxy)-2,2-dimethylpentanoic acid • 2,3,7,8-Tetrabromooxanthrene • 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-Heptadecafluorooctane-1-sulfonamide • 2,2',3,5,5',6-Hexachloro-1,1'-biphenyl • Dibutyl benzene-1,2-dicarboxylate • Hexabromobenzene • Phenol • 1,4-Dichlorobenzene • 2,2',3,4',5'-Pentachloro-1,1'-biphenyl • 2,2',4,6-Tetrachloro-1,1'-biphenyl • 2,2',5,5'-Tetrachloro-1,1'-biphenyl • 2,2',4,5',6-Pentachloro-1,1'-biphenyl • 2,4-Dichlorophenol • (4R,4aS,5aS,6S,12aS)-4-(Dimethylamino)-3,6,10,12,12a-pentahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide • Lead • 2,3,3',5'-Tetrachloro-1,1'-biphenyl • 2,3,4,6,7,8-Hexachlorodibenzo[b,d]furan • 2,2',3,3',4,5,5',6,6'-Nonachloro-1,1'-biphenyl • Dipropyl hydrogen phosphate • 2,3',6-Trichloro-1,1'-biphenyl • 1,2,3,5-Tetrabromo-4-(2,4,6-tribromophenoxy)benzene • Methyl 4-hydroxybenzoate • 1,4-Dinitrobenzene • N~1~{2-[(5-[(Dimethylamino)methyl]furan-2-yl)methyl)sulfanyl]ethyl}-N~1~methyl-2-nitroethene-1,1-diamine • Hexacosane • 2,2',4,4',5,6'-Hexachloro-1,1'-biphenyl • 3-Methoxy-17alpha-19-norpregna-1,3,5(10)-trien-20-yn-17-ol • Rubidium • 4,6,6,7,8,8-Hexamethyl-1,3,4,6,7,8-hexahydroindeno[5,6-c]pyran • Potassium • Chrysene • 4-Chloro-1,1'-biphenyl • 2,2',4,6'-Tetrachloro-1,1'-biphenyl • 2,3,6-Trichloro-1,1'-biphenyl • Chromium • 2,3,3',4',5,5',6-Heptachloro-1,1'-biphenyl • Molybdenum • 2,2',3,4',5,5'-Hexachloro-1,1'-biphenyl • (4R)-1-Methyl-4-(prop-1-en-2-yl)cyclohex-1-ene • 1,2,3,7,8-Pentabromooxanthrene • Phenylmethanol • Solanid-5-en-3beta-yl • 6-deoxy-alpha-L-mannopyranosyl-(1->2)-[beta-D-glucopyranosyl-(1->3)]-beta-D-galactopyranoside • Stigmast-5-en-3beta-ol • 2,2',3,3'-Tetrachloro-1,1'-biphenyl • 2,2',3,4,4',5,6'-Heptachloro-1,1'-biphenyl • 3-Chloro-1,1'-biphenyl • 2,2',3,3',5,5'-Hexachloro-1,1'-biphenyl • 3,3',4,4'-Tetrachloro-1,1'-biphenyl • 2,2',3,3',4,5',6-Heptachloro-1,1'-biphenyl • 2,2',3,3',4,6'-Hexachloro-1,1'-biphenyl • 2,2',3,4',5,6'-Hexachloro-1,1'-biphenyl • 1,2,3,4,6,7,8-Heptachlorodibenzo[b,d]furan • 2,3,4,5-Tetrachloro-1,1'-biphenyl • 2,3',4',6-Tetrachloro-1,1'-biphenyl • 2,2',3,3',4,6,6'-Heptachloro-1,1'-biphenyl • 2,6-Dichloro-1,1'-biphenyl • 2,3,3',4,4',5'-Hexachloro-1,1'-biphenyl • 2-Ethylhexyl diphenyl phosphate • (({(2R)-1-(6-Amino-9H-purin-9-yl)propan-2-yl]oxy)methyl)phosphonic acid • 1-Phenylpropan-2-amine • 1,2,3,6,7,8-Hexachlorodibenzo[b,d]furan • Hexadecane • N,N-Diethyl-3-methylbenzamide • 1,2,3,5-Tetrabromo-4-(3,4,5-tribromophenoxy)benzene • 1-Nitrosopyrrolidine • Methyl (1R,2R,3S,5S)-3-(benzoyloxy)-8-methyl-8-azabicyclo[3.2.1]octane-2-carboxylate • Ethyl bis(4-chlorophenyl)(hydroxy)acetate • 2,4-Dibromo-1-(4-bromophenoxy)benzene • 2-Methylnaphthalene • Cyanide • Heptadecafluorooctane-1-sulfonic acid • 2,2',4,4',5,5'-Hexachloro-1,1'-biphenyl • 2,2',3,3',5,6'-Hexachloro-1,1'-biphenyl • Phenanthrene • 1,1'-Biphenyl • 2,3,4,6-Tetrachloro-1,1'-biphenyl • 1-Ethyl-7-methyl-4-oxo-1,4-dihydro-1,8-naphthyridine-3-carboxylic acid • 4,4'-Sulfanediylbis(2-tert-butyl-5-methylphenol) • Benzene-1,4-dicarboxylic acid • 2,3',4,4',5,5'-Hexachloro-1,1'-biphenyl • 2-(Methylsulfanyl)-1,3-benzothiazole • 5-Amino-1-[2,6-dichloro-4-(trifluoromethyl)phenyl]-4-(trifluoromethyl)-1H-pyrazole-3-carbonitrile • 2,3,4,4'-Tetrachloro-1,1'-biphenyl • 2-(2,3-Dimethylanilino)benzoic acid • 2,4-Di-tert-butylphenol • 1,2-Dibromo-2,2-dichloroethyl dimethyl phosphate • (4R,4aS,5aS,6S,12aS)-7-Chloro-4-(dimethylamino)-3,6,10,12,12a-pentahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide • Butan-2-one • (2S,3S)-2-(4-Methoxyphenyl)-5-[2-(methylamino)ethyl]-4-oxo-2,3,4,5-tetrahydro-1,5-benzothiazepin-3-yl acetate • (1r,2r,3r,4r,5r,6r)-1,2,3,4,5,6-Hexachlorocyclohexane • N,N-Dimethyl-1-(10H-phenothiazin-10-yl)propan-2-amine • Cerium • 3,4,4',5-Tetrachloro-1,1'-biphenyl • (4R,4aS,12aS)-4-(Dimethylamino)-3,10,11,12a-tetrahydroxy-6-methyl-1,12-dioxo-1,4,4a,5,12,12a-hexahydrotetracene-2-carboxamide • 2,2',3,4,6,6'-Hexachloro-1,1'-biphenyl • 2,3',4,5'-Tetrachloro-1,1'-biphenyl • 2,4'-Dichloro-1,1'-biphenyl • 4-Nonylphenol • 2-[4-(4-Chlorobenzoyl)phenoxy]-2-methylpropanoic acid • 1,1'-(2,2-Dichloroethane-1,1-diyl)bis(4-chlorobenzene) • 4,4,5,5,6,6,7,7,8,8,8-Undecafluorooctanoic acid • 5-Amino-1-[2,6-dichloro-4-(trifluoromethyl)phenyl]-4-(trifluoromethanesulfonyl)-1H-pyrazole-3-carbonitrile • S-{2-[(Benzenesulfonyl)amino]ethyl} O,O-dipropan-2-yl phosphorodithioate • 5H-Dibenzo[b,f]azepine-5-carboxamide • N-(4-Hydroxyphenyl)acetamide • Benzenethiol • Tetraphenyl (propane-2,2-diyl)di(4,1-phenylene) bis(phosphate) • 2,2,4,4,6,6,8,8,10,10-Decamethyl-1,3,5,7,9,2,4,6,8,10-pentoxapentasilcane • Sulfate • 2,3,3',4',5,5'-Hexachloro-1,1'-biphenyl • O-Ethyl O-(4-nitrophenyl) phenylphosphonothioate • 2-Chloronaphthalene • 2,3,3',6-Tetrachloro-1,1'-biphenyl • 2,2',3,3',4,4',5,6'-Octachloro-1,1'-biphenyl • (4R,4aR,5S,5aR,6S,12aS)-4-(Dimethylamino)-3,5,6,10,12,12a-hexahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-

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carboxamide • 2,4-Dibromo-1-(2-bromophenoxy)benzene • Dichloromethane • 2,2',3,3',6-Pentachloro-1,1'-biphenyl • 5beta-Cholestan-3beta-ol • rel-(1aR,2R,2aR,6S,6aS,7S,7aS)-3,4,5,6,9,9-Hexachloro-1a,2,2a,3,6,6a,7,7a-octahydro-2,7:3,6-dimethanonaphtho[2,3-b]oxirene • 5-[3-(Dimethylamino)propylidene]-10,11-dihydro-5H-dibenzo[a,d][7]annulen-10-ol • 5-Amino-1-[2,6-dichloro-4-(trifluoromethyl)phenyl]-4-(trifluoromethanesulfonyl)-1H-pyrazole-3-carbonitrile • 2-(3,4-Dimethoxyphenyl)-5-[[2-(3,4-dimethoxyphenyl)ethyl]amino]-2-(propan-2-yl)pentanenitrile • Barium • Estra-1,3,5(10)-triene-3,16alpha,17beta-triol • Bromide • Triphenylene • (2S,3R)-4-(Dimethylamino)-3-methyl-1,2-diphenylbutan-2-yl propanoate • Tris(2-chloroethyl) phosphate • 2,2',3,3',5,6-Hexachloro-1,1'-biphenyl • 2,2',3,3',5-Pentachloro-1,1'-biphenyl • 2,2',3,4',5-Pentachloro-1,1'-biphenyl • 2,3,7,8-Tetrachlorodibenzo[b,d]furan • Pregn-4-ene-3,20-dione • 3,4'-Dichloro-1,1'-biphenyl • (2,4-Dichlorophenoxy)acetic acid • (3S,4R)-3-[(2H-1,3-Benzodioxol-5-yl)oxy]methyl-4-(4-fluorophenyl)piperidine • Bis(2-ethylhexyl) hydrogen phosphate • 2,2',3,4,5,6'-Hexachloro-1,1'-biphenyl • 1H-Indole • 1,2,3,4,6,7,8-Heptachlorooxanthrene • 1,2,3,7,8,9-Hexachlorodibenzo[b,d]furan • 9-Fluoro-3-methyl-10-(4-methylpiperazin-1-yl)-7-oxo-2,3-dihydro-7H-[1,4]oxazino[2,3,4-ij]quinoline-6-carboxylic acid • 2,3,3',4,4',6-Hexachloro-1,1'-biphenyl • 3,6-Dimethylphenanthrene • S-(2,3-Dichloroprop-2-en-1-yl) dipropan-2-ylcarbamoithoate • (3R,4S,5S,6R,7R,9R,11R,12R,13S,14R)-6-[(2S,3R,4S,6R)-4-(Dimethylamino)-3-hydroxy-6-methyloxan-2-yl]oxy-14-ethyl-12,13-dihydroxy-4-[(2R,4R,5S,6S)-5-hydroxy-4-methoxy-4,6-dimethyloxan-2-yl]oxy-7-met hoxy-3,5,7,9,11,13-hexamethyl-1-oxacyclotetradecane-2,10-dione (non-preferred name) • 4,4'-Dichloro-1,1'-biphenyl • 2,2',3,4,4',5,6-Heptachloro-1,1'-biphenyl • 1,2,3,4,6,7,8,9-Octabromodibenzo[b,d]furan • 2,2',4,4',6-Pentachloro-1,1'-biphenyl • 2,2',3,4,4',5,6,6'-Octachloro-1,1'-biphenyl • (1R,2R,3S,5S)-3-(Benzoyloxy)-8-methyl-8-azabicyclo[3.2.1]octane-2-carboxylic acid • Stigmastan-3beta-ol • Diethyl hydrogen phosphate • 2,3,3',4',5',6-Hexachloro-1,1'-biphenyl • Androst-4-ene-3,17-dione • 2-Hydroxy-5-((4-[(pyridin-2-yl)sulfamoyl]phenyl)diazanyl)benzoic acid • O,O-Dimethyl S-[(4-oxo-1,2,3-benzotriazin-3(4H)-yl)methyl] phosphorodithioate • 5-Ethyl-8-oxo-5,8-dihydro-2H-[1,3]dioxolo[4,5-g]quinoline-7-carboxylic acid • 1,4-Xylene • 2,3,3',4,4',5,6-Heptachloro-1,1'-biphenyl • 1,2,3,4,7,8-Hexabromodibenzo[b,d]furan • 17alpha-19-Norpregna-1,3,5(10)-trien-20-yne-3,17-diol • 3,5-Dichloro-1,1'-biphenyl • 2-Methylphenol • Vanadium • (3R,4S,5S,6R,7R,9R,11S,12R,13S,14R)-6-[(2S,3R,4S,6R)-4-(Dimethylamino)-3-hydroxy-6-methyloxan-2-yl]oxy-14-ethyl-7,12,13-trihydroxy-4-[(2R,4R,5S,6S)-5-hydroxy-4-methoxy-4,6-dimethyloxan-2-yl]oxy-10 -[(2-methoxyethoxy)methoxy]imino-3,5,7,9,11,13-hexamethyl-1-oxacyclotetradecan-2-one (non-preferred name) • 2,2',4,5,6'-Pentachloro-1,1'-biphenyl • 2,3,3'-Trichloro-1,1'-biphenyl • 1,2,3,6,7,8-Hexachlorooxanthrene • 2,3,3',5',6-Pentachloro-1,1'-biphenyl • (24R)-Ergost-5-en-3beta-ol • 3,3',4,4',5,5'-Hexachloro-1,1'-biphenyl • 1,2,3,4,7,8,9-Heptachlorodibenzo[b,d]furan • 1,2,3,4,5-Pentabromo-6-ethylbenzene • 3-Methyl-1H-indole • 2,2',4,6,6'-Pentachloro-1,1'-biphenyl • (2R,3S,4R,5R,8R,10R,11R,12S,13S,14R)-2-Ethyl-3,4,10-trihydroxy-3,5,6,8,10,12,14-heptamethyl-15-oxo-11-[[3,4,6-trideoxy-3-(dimethylamino)-beta-D-xylo-hexopyranosyl]oxy]-1-oxa-6-azacyclopentadecan-13-yl 2,6-dideoxy-3-C-methyl-3-O-methyl-alpha-L-ribo-hexopyranoside • 2,3',4,4',5'-Pentachloro-1,1'-biphenyl • 2-[Bis(2-chloroethyl)amino]-1,3,2lambda~5~-oxazaphosphinan-2-one • 4-Amino-N-(pyrimidin-2-yl)benzene-1-sulfonamide • Fluoranthene • 2,3-Dichloro-1,1'-biphenyl • 1-(2-(2,4-Dichlorophenyl)-2-[(2,4-dichlorophenyl)methoxy]ethyl)-1H-imidazole • 1-Methyl-4-(propan-2-yl)benzene • 2,3,3',4,5,5'-Hexachloro-1,1'-biphenyl • 2,3,7,8-Tetrabromodibenzo[b,d]furan • 2,2',3,3',4,5,6,6'-Octachloro-1,1'-biphenyl • Copper • 2-(4-Methylcyclohex-3-en-1-yl)propan-2-ol • 3,3',4,5'-Tetrachloro-1,1'-biphenyl • 2,3',4,4',5',6-Hexachloro-1,1'-biphenyl • 4,4,4'-(Butane-1,1,3-triyl)tris(2-tert-butyl-5-methylphenol) • 2-(Acetyloxy)benzoic acid • Nickel • Decane • Dimethyl benzene-1,2-dicarboxylate • 2-Propylpentanoic acid • 1,1'-(Ethane-1,2-diyl)bis(pentabromobenzene) • Benzo[ghi]perylene • 2,3,4',5-Tetrachloro-1,1'-biphenyl • 2,4,4',5-Tetrachloro-1,1'-biphenyl • 1-Phenylethan-1-one • 2,4-Dichloro-1-(4-chloro-2-methoxyphenoxy)benzene • 2,4,4'-Trichloro-1,1'-biphenyl • 1,2-Dichloropropane • Dimethyl (2,2,2-trichloro-1-hydroxyethyl)phosphonate • Boron • 6-Amino-1,3,5-triazine-2,4(1H,3H)-dione • 2-Methylpyridine • (3R,5R)-7-[2-(4-Fluorophenyl)-3-phenyl-4-(phenylcarbonyl)-5-(propan-2-yl)-1H-pyrrol-1-yl]-3,5-dihydroxyheptanoic acid • 2,5-Dichloro-1,1'-biphenyl • 4-Methylphenol • (1R,2R,3R,4R,5S,6S)-1,2,3,4,5,6-Hexachlorocyclohexane • 2-[(2-Chlorophenyl)methyl]-4,4-dimethyl-1,2-oxazolidin-3-one • 1,4,5,6,7,8,8-Heptachloro-3a,4,7,7a-tetrahydro-1H-4,7-methanoindene • Trichloromethane • Heptafluorobutanoic acid • Butyl 4-hydroxybenzoate • 2-(3-Benzoylphenyl)propanoic acid • 2,3,3',4-Tetrachloro-1,1'-biphenyl • 2,2',4,5-Tetrachloro-1,1'-biphenyl • 4-Chloro-3-methylphenol • Fluoride • 1,3,7-Trimethyl-3,7-dihydro-1H-purine-2,6-dione • 2,3,3',4',6-Pentachloro-1,1'-biphenyl • 1,3,5-Triazine-2,4,6-triamine • (1aS,1bR,2R,5R,5aS,6R,6aS)-2,3,4,5,6,7,7-Heptachloro-1b,2,5,5a,6,6a-hexahydro-1aH-2,5-methanoindeno[1,2-b]oxirene • 2,3,3',4',5'-Pentachloro-1,1'-biphenyl • 2,3',4',5',5'-Pentachloro-1,1'-biphenyl • Tricosafuorododecanoic acid • 9,10-Dimethoxy-5,6-dihydro-2H-[1,3]dioxolo[4,5-g]isoquinolino[3,2-a]isoquinolin-7-ium • 2,2',3,4,5'-Pentachloro-1,1'-biphenyl • (2S,5R,6R)-6-[(2R)-2-Amino-2-(4-hydroxyphenyl)acetyl]amino-3,3-dimethyl-7-oxo-4-thia-1-azabicyclo[3.2.0]heptane-2-carboxylic acid • Triphenyl phosphate • N,N-Diethylnitrous amide • Pentadecafluorooctanoic acid • 3-Chloroprop-1-ene • N,N-Dimethylnitrous amide • 4,4'-(Propane-2,2-diyl)bis(2,6-dibromophenol) • 1,2-Dibromo-4-(2,4-dibromophenoxy)benzene • 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-Heptadecafluorodecane-1-sulfonic acid • 3,3',5,5'-Tetrachloro-1,1'-biphenyl •

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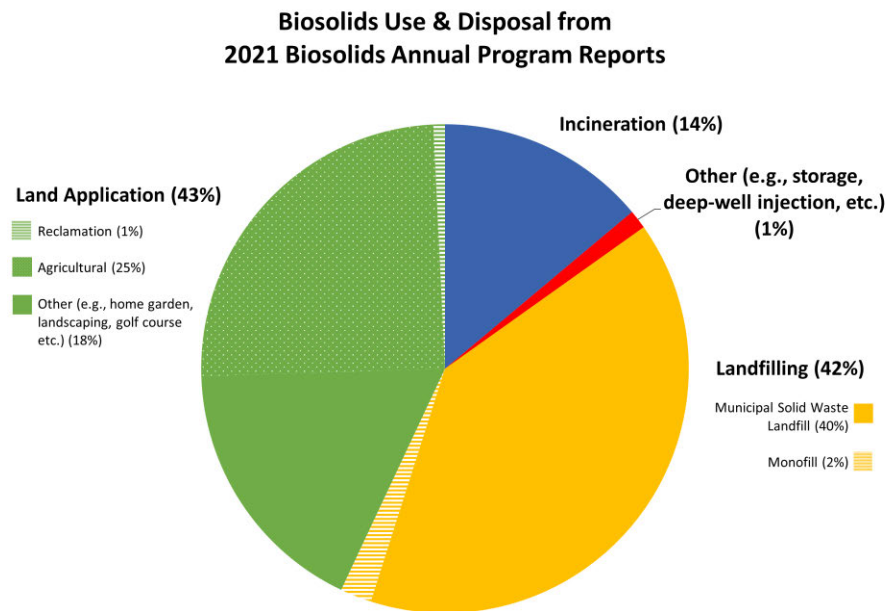
1-tert-Butyl-3,5-dimethyl-2,4,6-trinitrobenzene • 1,3,5-Trichlorobenzene • 2,2',3,3',4,6-Hexachloro-1,1'-biphenyl • 3-Methoxy-17-methyl-5alpha-7,8-didehydro-4,5-epoxymorphinan-6alpha-ol • (4S,4aR,5S,5aR,6R,12aS)-4-(Dimethylamino)-3,5,10,12,12a-pentahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide • 1,1'-Oxybis(2,3,4,6-tetrabromobenzene) • 1-[(2-Chlorophenyl)(diphenyl)methyl]-1H-imidazole • 2,2',3,4,4',5,6'-Heptachloro-1,1'-biphenyl • 2,3,3',4'-Tetrachloro-1,1'-biphenyl • N,N-Dipropylnitrous amide • 3alpha-Hydroxy-5alpha-androstan-17-one • Icosane • 2,2',3,4,6'-Pentachloro-1,1'-biphenyl • 2,2',3,4',5,6,6'-Heptachloro-1,1'-biphenyl • [(Ethane-1,2-diyl)bis(oxy)ethane-2,1-diyl] bis[3-(3-tert-butyl-4-hydroxy-5-methylphenyl)propanoate] • 1,2,3,4,7,8,9,10,13,14,14-Dodecachloro-1,4,4a,5,6,6a,7,10,10a,11,12,12a-dodecahydro-1,4:7,10-dimethanodibenzo[a,e][8]annulene • 2,2',3,4,5-Pentachloro-1,1'-biphenyl • 1,2,3,6,7,8-Hexabromodibenzo[b,d]furan • Tris(1,3-dichloropropan-2-yl) phosphate • 2,2',3,5',6-Pentachloro-1,1'-biphenyl • 2,2',3,3',4,5,6'-Heptachloro-1,1'-biphenyl • 1,3,5-Tribromo-2-(2,4-dibromophenoxy)benzene • 2,2',3,4,4',5,5'-Heptachloro-1,1'-biphenyl • Diphenyl hydrogen phosphate • 2,2',3,4',5',6'-Hexachloro-1,1'-biphenyl • Propan-2-one • 2-{4-[2-(4-Chlorobenzamido)ethyl]phenoxy}-2-methylpropanoic acid • 2,3,5-Trichloro-1,1'-biphenyl • 2,3',5'-Trichloro-1,1'-biphenyl • 2,2',5-Trichloro-1,1'-biphenyl • 17beta-Hydroxyestra-1,3,5(10)-trien-3-yl benzoate • 3,3',5'-Trichloro-1,1'-biphenyl • Hentriacontafluorohexadecanoic acid • 2,2',6,6'-Tetrachloro-1,1'-biphenyl • N'-(4-Chlorophenyl)-N,N-dimethylurea • 2,2',3,4,5,6,6'-Heptachloro-1,1'-biphenyl • 3-(10,11-Dihydro-5H-dibenzo[a,d][7]annulen-5-ylidene)-N,N-dimethylpropan-1-amine • 2,3,4-Trichloro-1,1'-biphenyl • 1,2-Dichlorobenzene • (2S)-2-(6-Methoxynaphthalen-2-yl)propanoic acid • 3,3',4,4',5-Pentachloro-1,1'-biphenyl • 3-Hydroxyestra-1(10),2,4,6,8-pentaen-17-one • Zinc • 1,2,3,5-Tetrabromo-4-(2,4,5-tribromophenoxy)benzene • 2,2',3,4,4'-Pentachloro-1,1'-biphenyl • Dibenzo[b,d]furan • 1,1'-Oxybis(2,4-dibromobenzene) • Hexan-2-one • 3-Hydroxyestra-1,3,5(10)-trien-17-one • 2-(3,4-Dimethoxyphenyl)-5-[[2-(3,4-dimethoxyphenyl)ethyl](methyl)amino]-2-(propan-2-yl)pentanenitrile • Tris(1-chloropropan-2-yl) phosphate • Caesium • 2,3,7,8-Tetrachlorooxanthrene • 2,2',3,6,6'-Pentachloro-1,1'-biphenyl • Benzoic acid • N-Pentanoyl-N-[[2-(1H-tetrazol-5-yl)[1,1'-biphenyl]-4-yl]methyl]-L-valine • 2,4',6-Trichloro-1,1'-biphenyl • Henicosafuoroundecanoic acid • 2,3',4-Trichloro-1,1'-biphenyl • 2,2',3,3',4,4',6-Heptachloro-1,1'-biphenyl • 4-Amino-N-(6-chloropyridazin-3-yl)benzene-1-sulfonamide • 2,3',4,5,5'-Pentachloro-1,1'-biphenyl • Benzo[e]acephenanthrylene • Tetraphenyl 1,3-phenylene bis(phosphate) • 2,2',3,3',4,5,6-Heptachloro-1,1'-biphenyl • Iron • Hexanoic acid • 1,1'-Oxybis(2,4,5-tribromobenzene) • Tetraphene • 4-Hydroxybenzoic acid • 2,2',3,3',4,5,5',6'-Octachloro-1,1'-biphenyl • 2,2',3,6-Tetrachloro-1,1'-biphenyl • Triethyl phosphate • 2,4,5-Trichloro-1,1'-biphenyl • 2,2',3,3',5,5',6-Heptachloro-1,1'-biphenyl • 2,3,3',4,4'-Pentachloro-1,1'-biphenyl • 4-Amino-N-(4-methylpyrimidin-2-yl)benzene-1-sulfonamide • 1-Methylphenanthrene • 2-Hydroxybenzoic acid • 4-[2-(tert-Butylamino)-1-hydroxyethyl]-2-(hydroxymethyl)phenol • 2,2'-Bioxirane • Titaniumato • 2,6-Di-tert-butylphenol • 2,3,4,6-Tetrachloro-1,1'-biphenyl • 2,2',3,4'-Tetrachloro-1,1'-biphenyl • (Methanesulfonyl)methane • 2-(1,3-Thiazol-4-yl)-1H-benzimidazole • Trimethyl phosphate • Perylene • 2-Chloro-1,1'-biphenyl • (1R,2S,3r,4R,5S,6s)-1,2,3,4,5,6-Hexachlorocyclohexane • Benzo[pqr]tetraphene • 2,3',5,5'-Tetrachloro-1,1'-biphenyl • 5-[(4,5-Dimethoxy-2-methylphenyl)methyl]pyrimidine-2,4-diamine • Tin • Heptacosafuorotetradecanoic acid • Bis(2-ethylhexyl)benzene-1,2-dicarboxylate • O,O-Dimethyl O-[3-methyl-4-(methylsulfonyl)phenyl] phosphorothioate • Ethyl 4-hydroxybenzoate • 2,2',4,4',6,6'-Hexachloro-1,1'-biphenyl • Nonafluoropentanoic acid • 2,2',3,3',4,4',5,6-Octachloro-1,1'-biphenyl • Dioctylbenzene-1,2-dicarboxylate • 2-Benzyl-4-chlorophenol • Manganese • 2,3,4,7,8-Pentachlorodibenzo[b,d]furan • 5-Chloro-N-(2-{4-[(cyclohexylcarbonyl)sulfamoyl]phenyl}ethyl)-2-methoxybenzamide • 1,2,3,7,8,9-Hexabromodibenzo[b,d]furan • N-Methyl-3-phenyl-3-[4-(trifluoromethyl)phenoxy]propan-1-amine • Estra-1,3,5(10)-triene-3,17alpha-diol • 2,2',3,3',4,5'-Hexachloro-1,1'-biphenyl • (5aR,6S,9R,9aS)-6,7,8,9,10,10-Hexachloro-1,5,5a,6,9,9a-hexahydro-3H-6,9-methano-3lambda~4~-2,4,3lambda~4~-benzodioxathiepin-3-one • 2,3,3',4,5,6-Hexachloro-1,1'-biphenyl • Arsenic • 2,5-Di-tert-butylphenol • 1,3-Dichlorobenzene • N,N-Dimethyltriimidodicarbonic diamide • 2,2-Bis(chloromethyl)propane-1,3-diyl tetrakis(2-chloroethyl) bis(phosphate) • 2,2',3,3',4,4',5,5'-Octachloro-1,1'-biphenyl • 2,3,3',4,5'-Pentachloro-1,1'-biphenyl • 1-[4-(2-Methoxyethyl)phenoxy]-3-[(propan-2-yl)amino]propan-2-ol • Benzo[k]fluoranthene • (4S,4aS,5aS,6S,12aS)-7-Chloro-4-(dimethylamino)-3,6,10,12,12a-pentahydroxy-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide • Bis(2-butoxyethyl) hydrogen phosphate • 1,3,5-Tribromo-2-(2,4,5-tribromophenoxy)benzene • Methyl 7-chloro-6,7,8-trideoxy-6-[[{(4R)-1-methyl-4-propyl-L-prolyl]amino]-1-thio-L-threo-alpha-D-galacto-octopyranoside • N'-Cyano-N-methyl-N'-(2-[[{(5-methyl-1H-imidazol-4-yl)methyl]sulfonyl}ethyl]guanidine) • 2,2',3,3',4,4',6,6'-Octachloro-1,1'-biphenyl • 1,2,3,4,5-Pentabromo-6-(2,3,4,6-tetrabromophenoxy)benzene • Pentachlorophenol • Naphthalene • Dodecane • Toluene • 1-(3,5,5,6,8,8-Hexamethyl-5,6,7,8-tetrahydronaphthalen-2-yl)ethan-1-one • 3,3',4-Trichloro-1,1'-biphenyl • Tetradecane • 2,2',3,3',4,5,5',6-Octachloro-1,1'-biphenyl • 2,3,3',4,4',5,5'-Heptachloro-1,1'-biphenyl • Chlorobenzene • (4S,4aS,5aR,12aS)-4,7-Bis(dimethylamino)-3,10,12,12a-tetrahydroxy-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide • 2,2',3,3',4,4',5-Heptachloro-1,1'-biphenyl • 2,2',3,5,5'-Pentachloro-1,1'-biphenyl • (3aR,7aS)-2-[(Trichloromethyl)sulfonyl]-3a,4,7,7a-tetrahydro-1H-isoindole-1,3(2H)-dione • Tris(2-ethylhexyl) phosphate • N-Phenyl-N-[1-(2-phenylethyl)piperidin-4-yl]propanamide • 1,2,3,4,5-Pentabromo-6-(2,3,4,5-tetrabromophenoxy)benzene • 2,3,3',5-Tetrachloro-1,1'-biphenyl • Pyrene • N,N-Diphenylnitrous amide • 6-Fluoro-1-(4-fluorophenyl)-4-oxo-7-(piperazin-1-yl)-1,4-dihydroquinoline-3-carboxylic acid • 3,4',5-Trichloro-1,1'-biphenyl •

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1,2,3,4,7,8-Hexachlorodibenzo[b,d]furan • (1R,2S,3r,4R,5S,6r)-1,2,3,4,5,6-Hexachlorocyclohexane • 2-Methylpropan-1-ol • 2,2'-Methylenebis(4-chlorophenol) • 2,4,6-Tri-tert-butylphenol • (22E)-Ergosta-5,7,22-trien-3beta-ol • 2-[4-(2-Methylpropyl)phenyl]propanoic acid • (2,4,5-Trichlorophenoxy)acetic acid • 2,3',4'-Trichloro-1,1'-biphenyl • Bis(3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl) hydrogen phosphate • 2,4,5-Trichlorophenol • 2,3',4,5',6-Pentachloro-1,1'-biphenyl • 2,3',5',6-Tetrachloro-1,1'-biphenyl • Chloroethane • 2,3'-Dichloro-1,1'-biphenyl • 3,4-Dihydroxybenzoic acid • 2,3',4',5',6-Pentachloro-1,1'-biphenyl • Henicosafuorodecane-1-sulfonic acid • 1-Cyclopropyl-7-(4-ethylpiperazin-1-yl)-6-fluoro-4-oxo-1,4-dihydroquinoline-3-carboxylic acid • 4-Amino-N-(1,3-thiazol-2-yl)benzene-1-sulfonamide • O-(4-Bromo-2,5-dichlorophenyl) O-methyl phenylphosphonothioate • Propanenitrile • 17-Methylmorphinan-3-ol • 2,3,4,6,7,8-Hexabromodibenzo[b,d]furan • 1,7-Dimethyl-3,7-dihydro-1H-purine-2,6-dione • 2,2',4,5,5'-Pentachloro-1,1'-biphenyl • • (1S,4R,4aR,5aS,6R,9S,9aR,9bS)-1,2,3,4,6,7,8,9,10,10,11,11-Dodecachloro-1,4,4a,5a,6,9,9a,9b-octahydro-1,4:6,9-dimethanodibenzo[b,d]furan • • (4S,4aS,12aS)-7-Chloro-4-(dimethylamino)-3,10,11,12a-tetrahydroxy-6-methyl-1,12-dioxo-1,4,4a,5,12,12a-hexahydrotetracene-2-carboxamide • Trimethylsilanol • 1,2,3,7,8,9-Hexabromooxanthrene • Nonadecafluorodecanoic acid • 5alpha-Cholestan-3beta-ol • 2,2'-Dichloro-1,1'-biphenyl • Octacosane • Methyl 6,8-dideoxy-6-[[4(R)-1-methyl-4-propyl-L-prolyl]amino]-1-thio-D-erythro-alpha-D-galacto-octopyranoside • 3-(Dibenzo[b,e]oxepin-11(6H)-ylidene)-N,N-dimethylpropan-1-amine • Triacotane • Tris(2-methylphenyl) phosphate • 4-Amino-N-(2,6-dimethoxypyrimidin-4-yl)benzene-1-sulfonamide • Octadecane • Octabromooxanthrene • 2,2',3,4,5,5'-Hexachloro-1,1'-biphenyl • (5S)-1-Methyl-5-(pyridin-3-yl)pyrrolidin-2-one • [2-(2,6-Dichloroanilino)phenyl]acetic acid • 2-[[4-[(7-Chloroquinolin-4-yl)amino]pentyl](ethyl)amino]ethan-1-ol • 3,4,4'-Trichloro-1,1'-biphenyl • 1-Nitrosopiperidine • 2-Methyl-1,3-dinitrobenzene • 2,2',3,4',5,6-Hexachloro-1,1'-biphenyl • 3beta-[[2,6-Dideoxy-beta-D-ribo-hexopyranosyl-(1->4)-2,6-dideoxy-beta-D-ribo-hexopyranosyl-(1->4)-2,6-dideoxy-beta-D-ribo-hexopyranosyl]oxy]-12beta,14-dihydroxy-5beta-card-20(22)-enolide • 9H-Thioxanthen-9-one • 3-Hydroxy-17-methyl-5alpha-4,5-epoxymorphinan-6-one • Tetracosane • 3-Phenyl-3-[4-(trifluoromethyl)phenoxy]propan-1-amine • O,O-Diethyl O-(3,5,6-trichloropyridin-2-yl) phosphorothioate • Tetraethyl diphosphate • 5-[(3,4,5-Trimethoxyphenyl)methyl]pyrimidine-2,4-diamine • • 2,3,3',5,5'-Pentachloro-1,1'-biphenyl • (22E)-Stigmasta-5,22-dien-3beta-ol • Octachlorooxanthrene • 2,2',3,4,4',5,5',6-Octachloro-1,1'-biphenyl • • N,N'-Bis(4-chlorophenyl)urea • 2,2',3,3',4,4',5,5',6-Nonachloro-1,1'-biphenyl • 4-Aminobenzene-1-sulfonamide • Tridecafluoroheptanoic acid • 2-(4-Chlorophenoxy)-2-methylpropanoic acid • Bis(2-methylphenyl) hydrogen phosphate • 2,2',4,4',5-Pentachloro-1,1'-biphenyl • N-(4-Chlorophenyl)-N'-(3,4-dichlorophenyl)urea • 1,1'-(2,2-Dichloroethene-1,1-diyl)bis(4-chlorobenzene) • 2-Methylprop-2-enitrile • 1,2,4-Tribromo-5-(2,4-dibromophenoxy)benzene • Nitrobenzene • Tributyl phosphate • (E)-1,2-Dichloroethene • 2,2',3,3',4,4'-Hexachloro-1,1'-biphenyl • 1-[(Naphthalen-1-yl)oxy]-3-[(propan-2-yl)amino]propan-2-ol • 2,3,3',4,4',5,6-Heptachloro-1,1'-biphenyl • N-Ethyl-N-(1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluorooctane-1-sulfonyl)glycine • 1-Phenylethyl (2E)-3-[[dimethoxyphosphoryl]oxy]but-2-enoate • 2,2',3,5-Tetrachloro-1,1'-biphenyl • 2,2',3,3',5,6,6'-Heptachloro-1,1'-biphenyl • 1,2,3,4-Tetrabromo-5-(2,3,4,6-tetrabromophenoxy)benzene • Selenium • 2-Chloro[1,1'-biphenyl]-4-ol • 1,1,2-Trichloroethene • Nonafluorobutane-1-sulfonic acid • 1,2,3,4,6,7,8-Heptabromodibenzo[b,d]furan • 1-Ethyl-6,8-difluoro-7-(3-methylpiperazin-1-yl)-4-oxo-1,4-dihydroquinoline-3-carboxylic acid • (2S,5R,6R)-6-[[[(2R)-2-Amino-2-phenylacetyl]amino]-3,3-dimethyl-7-oxo-4-thia-1-azabicyclo[3.2.0]heptane-2-carboxylic acid • 2,2',3,3',4,5',6'-Heptachloro-1,1'-biphenyl • 4-Chloro-2-[[[(furan-2-yl)methyl]amino]-5-sulfamoylbenzoic acid • 2,3,4,4',5,6-Hexachloro-1,1'-biphenyl • Tripropyl phosphate • 3,3'-Dichloro-1,1'-biphenyl • 1,2-Xylene • 4-Methylpentan-2-one • Undecafluorohexanoic acid • Strontium • 2,2',4,4',6-Pentachloro-1,1'-biphenyl • 5-Amino-2-hydroxybenzoic acid • 1,2,3-Tribromo-4-(2,4,5-tribromophenoxy)benzene • 2,3,3',4',5-Pentachloro-1,1'-biphenyl • 1,2,3,4,7,8-Hexachlorooxanthrene • 2,3,3',4,5,5',6-Heptachloro-1,1'-biphenyl • • 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-Heptadecafluorodecyl 3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl hydrogen phosphate • 2,4',5-Trichloro-1,1'-biphenyl • • Dibenzo[b,d]thiophene • 2,6,10,15,19,23-Hexamethyltetracosane-2,6,10,14,18,22-hexaene • 2,3',5-Trichloro-1,1'-biphenyl • Bis(1,3-dichloropropan-2-yl) hydrogen phosphate • 2,3,4,4',5-Pentachloro-1,1'-biphenyl • 2,3,3',4,4',5,5',6-Octachloro-1,1'-biphenyl • • 2,3',4',5-Tetrachloro-1,1'-biphenyl • 6-Phenylpteridine-2,4,7-triamine • 1,2,3,6,7,8-Hexabromooxanthrene • (1R,4S,4aS,5S,8R,8aR)-1,2,3,4,10,10-Hexachloro-1,4,4a,5,8,8a-hexahydro-1,4:5,8-dimethanonaphthalene • 14-Hydroxy-3-methoxy-17-methyl-5alpha-4,5-epoxymorphinan-6-one • 2,4,5-Trimethylaniline • 3,3,4,4,5,5,6,6,7,7,8,8,8-Tridecafluorooctane-1-sulfonic acid • Tetrachloroethene • • Benzyl butyl benzene-1,2-dicarboxylate • Ethylbenzene • 4-(Dimethylamino)-1,5-dimethyl-2-phenyl-1,2-dihydro-3H-pyrazol-3-one • Bis(3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl) hydrogen phosphate • Chloromethane • Tris(4-tert-butylphenyl) phosphate • 2,2',3,4,6-Pentachloro-1,1'-biphenyl • 2,3',4',5'-Tetrachloro-1,1'-biphenyl • 1,5-Dimethyl-2-phenyl-1,2-dihydro-3H-pyrazol-3-one • 1,2,3-Tribromo-4-(2,4-dibromophenoxy)benzene • Dimethyl 2,6-dimethyl-4-(2-nitrophenyl)pyridine-3,5-dicarboxylate • • 1,4-Dioxane • 4-Chloroaniline • 2,3,4',5,6-Pentachloro-1,1'-biphenyl • 2,2',3,4,4',6'-Hexachloro-1,1'-biphenyl • 2,2',3,5,6-Pentachloro-1,1'-biphenyl • 2,2',6-Trichloro-1,1'-biphenyl • 2,4-Dichloro-1,1'-biphenyl •

5-Amino-1-[2,6-dichloro-4-(trifluoromethyl)phenyl]-4-[(trifluoromethyl)sulfanyl]-1H-pyrazole-3-carbonitrile •
 17beta-Hydroxyandrost-4-en-3-one • 3-Methoxy-17-methyl-5alpha-4,5-epoxymorphinan-6-one • 3,4,5-Trichloro-1,1'-biphenyl •
 (4S,4aR,5S,5aR,6S,12aS)-4-(Dimethylamino)-3,5,6,10,12,12a-hexahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-
 carboxamide • 2,2',3,5'-Tetrachloro-1,1'-biphenyl • 1,1'-Oxydibenzene • 1,2,3,4,5-Pentachloro-6-nitrobenzene •
 2,2',3,3',4,4',5,5',6,6'-Decachloro-1,1'-biphenyl • 2,2',3,5,6'-Pentachloro-1,1'-biphenyl • Tridecafluorohexane-1-sulfonic acid •
 1,2,4-Trichlorobenzene • [1-(4-Chlorobenzoyl)-5-methoxy-2-methyl-1H-indol-3-yl]acetic acid • Prop-2-en-1-ol •
 2,2',3,4',6-Pentachloro-1,1'-biphenyl • 2,3',4,5-Tetrachloro-1,1'-biphenyl •
 (2S,5R,6R)-3,3-Dimethyl-7-oxo-6-(2-phenoxyacetamido)-4-thia-1-azabicyclo[3.2.0]heptane-2-carboxylic acid •
 17-Hydroxy-17alpha-19-norpregn-4-en-20-yn-3-one • 2,2',3,3',4-Pentachloro-1,1'-biphenyl •
 rel-(1R,3aS,3bR,9aR,9bS,11aS)-11a-Ethyl-1-ethynyl-1-hydroxy-1,2,3,3a,3b,4,5,8,9,9a,9b,10,11,11a-tetradecahydro-7H-cyclopenta[a]phenan-
 thren-7-one (non-preferred name) • Pentacosafuorotridecanoic acid • Methyl 3-[(dimethoxyphosphoryl)oxy]but-2-enoate •
 2,3',4,4',5-Pentachloro-1,1'-biphenyl • S-[[[(4-Chlorophenyl)sulfanyl]methyl] O,O-diethyl phosphorodithioate •
 1-Ethyl-6-fluoro-4-oxo-7-(piperazin-1-yl)-1,4-dihydroquinoline-3-carboxylic acid • 2,6-Di-tert-butyl-4-methylphenol •
 (2S,5R,6R)-6-[[3-(2-Chloro-6-fluorophenyl)-5-methyl-1,2-oxazole-4-carbonyl]amino]-3,3-dimethyl-7-oxo-4-thia-1-azabicyclo[3.2.0]heptane-
 2-carboxylic acid

Appendix 2 - [EPA Biosolids Pie Chart](#)



Requirement of Source Separation of Residential Organic Waste

 rules.cityofnewyork.us/rule/requirement-of-source-separation-of-residential-organic-waste/



Rule status: Proposed

Agency: DSNY

Comment by date: August 10, 2023

[Rule Full Text](#)

[DSNY-Proposed-Rule-Relating-to-Mandatory-Organics-1.pdf](#)

DSNY is proposing to amend its rules regarding the residential collection of designated recyclable materials to require the source separation of organic waste.

Attendees who need reasonable accommodation for a disability such as a sign language translation should contact the agency by calling [1 \(646\) 885-4996](tel:16468854996) or emailing by **August 4, 2023**

Send comments by

Public Hearings

Public Hearing

Date

August 10, 2023

10:00am - 11:00am EDT

Location

Connect Virtually

<https://tinyurl.com/4pf9ndd8>

Meeting number: 2632 721 0812

Password: mMMmnBXc745 (66666292 from phones and video systems)

Join by video system

Dial 26327210812@webex.com

You can also dial 173.243.2.68 and enter your meeting number.

Join by phone

+1-408-418-9388 United States Toll

Access code: 263 272 10812

Disability Accommodation

Comments are now closed.

Online comments: 132

Deborah Howard

I strongly agree that this needs to be mandatory but think residences should have access to bins currently in use

Comment added July 10, 2023 3:06pm

Clara Schuhmacher

I strongly support DSNY's proposal to require source separation of organic waste for residential collection. I have taken my compost to the farmers market for 10+ years, and now help my building manage its brown bin as part of the pilot program in Williamsburg. DSNY has been very responsive when we've had issues with the bin, and I am pleased with how they are running the program. However, we're not going to make meaningful impact at this small scale. The benefits of this move are immediate and monumental — providing the slurry to create biogas that lessen our communities' reliance on natural gas, reducing the city's costs in sending material to landfill (plus the climate benefits of such a diversion), and frankly, the more we separate + the more often organic waste is picked up, the less smelly and rat-filled our streets will be. It makes economic sense and quality of life sense. But as we know, behavior change is hard – and this isn't going to take on a meaningful scale unless it's required and enforced. (Enforcement is key!) Let's get it together NYC. It's 2023!

Comment added July 11, 2023 11:22pm

Ella Smith

As a resident who already contributes to her brown bin, the compost program is easy and so important to the health of our planet and our city. I urge the government to make the right choice in support of our environment and mandate composting!

But mandating it is not enough, it must be enforced as well! We can see how the plastic bag ban has turned out... without enforcing it, there is no reason for so many stores to stop using plastic. Please make aggressive changes as it's the only way to combat our climate and pollination crisis!

Comment added July 12, 2023 12:33am

Ed Rich

I am strongly against this proposal. The rat problem in NYC continues to be out of control, and the addition of organic waste collection inside of apartment buildings will only make the problem worse. Until such time that the rat problem is addressed, this proposed regulation should be tabled. The benefits DO NOT outweigh the problems that will result from its implementation.

Comment added July 18, 2023 10:18am

john green

why is nyc so crazy. please stop making life harder for your citizens. we don't want more trash in our buildings.

Comment added July 18, 2023 10:20am

DONNA SCAPPATICCI

I oppose this legislation as it would encourage rat infestation INSIDE the building. We currently have in place an exterminator program twice a month which keeps the pests out. It will almost be impossible to keep out pests with this new legislation. Thank you.

Comment added July 18, 2023 10:24am

MARYANNE GOURAS

As much as I am for reducing waste, I cannot approve of this measure. Living in Brooklyn and having a food waste bin outside my house is not a problem in the cooler months, but in the warm ones, I can't stand it. Believe me, I do my best to keep it clean, but it does not deter the mice or the maggots. I stopped using it in the summer. This proposed measure will definitely bring all these pests inside the buildings. Enough already! How much more burden will be placed on homeowners, large ones and small ones?

Comment added July 18, 2023 10:25am

Nan schiff eisenberg

The proposal for keeping food waiting fir pick up in an effort to green will not correspond well with rat abatement. Please do not do this. Ray abatement is our priority

Comment added July 18, 2023 10:26am

Jo Wo

I oppose. As an individual, I do compost to the brown bins at the drop off sites. However, as a building manager, I see that most residents already have trouble separating recyclables despite repeated communication. People most often do not recycle correctly (e.g. doesn't wash out containers, leaving food inside), which essentially makes the entire recycling process moot. Based on my experience, it is unrealistic to expect that people to compost correctly. People will put cooked meats and oily dishes into the compost as well and it will make the compost smell like garbage. This will also attract more rodents, a problem the city is already struggling to fight. If the city wants people to compost more, they should put more compost sites out and more often. Those proactive enough to go will hopefully do it correctly. But those who are indifferent will not do it correctly.

Comment added July 18, 2023 10:28am

Michael Peters

I rented a condo unit in a building in brooklyn with several of the brown organic bins in the basement level.

The level of maggots and flies that this created can not be overstated. Management emptied them and tried to keep them clean.

When brought outside to be cleaned it created an infestation of flies outside of the building as well. A once pristine new small condo building became infested with pests, a violation of another law, Local 55.

Keeping anything organic outside of bags and left in or outside of a building is a terrible idea, regardless of the very noble intent. If bag liners were used then great but that will not happen. The bins become cesspools. Multiply that by every building in new york city. There simply isn't enough labor power to execute such a plan in compliance with existing laws and will absolutely create a worse environment within nyc housing.

Comment added July 18, 2023 10:30am

Paula Zacharakos

Forcing composting into multifamily residential buildings, when we can't get 30% of the residents to recycle, is an ignorant move. Then having food waste sit and be collected on a once a week cycle, the same as recycling, is beyond ignorant. When are the rule makers going to face reality about the population that they oversee. All we are doing is throwing NYC back into the 1970's, both financially and now sanitation wise. We are just setting up food buffets for the rodents....

Comment added July 18, 2023 10:35am

Christopher Athineos

As a property owner of a multi family building I strongly OPPOSE this proposal. We made every effort to have our tenants compost previously and it was a disaster. Our compost bins were covered with maggots crawling all over and the tenants were not using care to close the lid tightly. This caused a rise in cockroaches and mice inside the apts. When we put the bins out for collection at the curb, when the sanitation workers dumped the contents into the truck, inadvertently half of the contents were left on the street for rats and sadly, dogs to eat. In theory it's a nice idea, but it's not practical in an apt building.

Comment added July 18, 2023 10:36am

Leonard Fox

I am a managing agent. A number of the properties I manage in mid-town Manhattan East are composed totally of studio apartments of about 300 square feet. Recycling now requires 3 garbage compartments, now a 4th. This will be a hardship for these tenants. Furthermore, I believe quite strongly that few if any of the residents will abide with this and separate bio garbage. In addition, the public areas of these properties are minimal, and finding a place to store the bio debris will be problematical. Not to mention, odors and vermin. Recycling bio garbage is a laudable goal but the City needs to come up with a more viable plan. Perhaps some type of streetside bin that services the entire block, that would keep the odors and vermin out of the buildings. Thank you.

Comment added July 18, 2023 10:36am

Kris Tapper

So first we were made to believe the change to the garbage put-out time to 8 PM would decrease the rat activity because rats can, of course, tell time. Now, whatever little strides might have been made will be negated with this organic waste pick-up. I do not understand New York City's fascination with trying to remake ourselves as some sort of utopia with everything else going on in this city. Regular garbage that is picked up three times a week smells. Has no one thought of the implications of the stench as well as the rodent activity in summer months with this new program? This is a ridiculous idea. For those who think it's a wonderful idea, I suggest they get on their bikes and bike, following all the rules of the road, of course, to a facility or an area in each borough that will be compost-central. Otherwise, I am not a fan of this proposal.

Comment added July 18, 2023 10:36am

Y. F PIERRE

Keeping the trash in apartments is a crazy idea. I believe it's an invitation to rats 🐭, mice, and reaches to live permanently inside of the building. No matter how often you exterminate, you would never get rid of them.

Comment added July 18, 2023 10:37am

Ameet Sachdev

This idea may seem great in theory but in practice, it will lead to a sanitation nightmare for residents. Many residents will not comply with this regulation, if their failure to comply with standard recycling is any indication, and the supers and building staff will have to go through each garbage bag to separate out organic materials. This will be onerous and dangerous to the health of building staff. Not only this but having organic waste separated out and waiting in a building is an invitation for pests and rodents to feast on the waiting garbage, exacerbating the current pest issues facing the city. Far more logical would be for the city to place it's own organic waste baskets around the city for residents to use instead of making property owners and managers responsible for what should be all individuals responsibility to recycle and dispose of organic waste responsibly.

Comment added July 18, 2023 10:42am

Deo Sukhu

Stricter the government wiser the rat population. How many of these trash containers and trash bags have holes at the bottom?? It is the city's fault to leave the trash on the street for 12 hrs an average. Trash should be picked up firstly. I think they are looking to make money from taxpayers. You work you pay taxes. You own a house real estate tax. Bridge taxes. Political sit and make laws and give themselves big pay raise. On your back. Smile and wave boys.

Comment added July 18, 2023 10:43am

IRENE KNECHT

Asking to separate food waste in single area private housing seems like a novel idea but the purpose of limiting rats in these area is will not be achieved becuse these area usually dont have rat problems. The real issue that will be created is these rules requiring old buildinds without space to keep food waste separate will bring the rat problem inside the buildings causing catastrophic infestation problems inside the residences. Please do not implement this rule becaus the unintended consquences will be devastating.

Comment added July 18, 2023 10:43am

JRC

Jo Wo below has it right– this rule will worsen the city's rodent and pest problem. This is a classic example of a "sit down and come over here" from the city. Property managers are being held responsible for rodents and pests in tenants' apartments and now this rule will worsen all tenants' pest problems by creating feeding centers inside our buildings. Please come up with central compost drop-off centers (outside buildings) where tenants can bring their garbage to compost. I know it's hard to get elected if you place some responsibility on tenants to actually do something to help the city, but i'd argue the welfare of the city should be foremost in your minds.

Comment added July 18, 2023 10:49am

Xuereb Mark

The proposed rule is not tenable without significant pest control problems that would result from such a requirement.

Comment added July 18, 2023 10:53am

Gigi Porcelli

ANY attempt to recycle organic waste in the South Bronx will be disastrous. On a hot summer day you can smell the garbage as you walk past buildings. At 176th Street I used to watch the rats as they picked over the garbage bags. If you have organic waste in buildings, it will be like ringing the dinner bell. We did everything we could to keep the rats at bay. We were successful but less than a block away – the Mount Hope Community Center was overrun with rats.

Comment added July 18, 2023 10:53am

Derrick Jackson

Please do not approve this proposal as it would cause as infestation of pests inside the building where the organic material would be stored.

Comment added July 18, 2023 10:54am

Bernadette

This is insane and I OPPOSE this motion. Do you live in NYC? How about we tackle rats, not provide food for increasing the population. Did you know rats are now coming out of residential toilets? This is a new problem PLUMBING COMPANIES are facing when dealing with clogs -is it a clog or will a rat pop out. This is a real thing and these measures will only increase the already unmanageable rodent population.

How about loosening up restrictions regarding rodenticide. Also while we are on the topic of waste- dog poop. Why is the city covered in it? Nothing is being done and it is a quality of life issue. Also human excrement. There is a growing number of human relieving themselves in the subway, street, apartment building common areas. It is disgusting and DSNY should tackle common sense issues before burdening the citizenry with more nonsense.

Comment added July 18, 2023 10:54am

Dinaria Feggaropoulos

I strongly oppose the organic waste / food trash to be source separated. As do Our facilities managers and building maintenance workers as well. Although personally I support composting, the issue of rats, maggots and roaches will undoubtedly be exacerbated. I have seen this in my own home as well as tenants who have kept the brown bins in their apartments without being responsible about covering the bin nor do they separate properly. Not to mention the terrible odor from the compost bins unless picked up daily or what about when tenants go on vacation and forget to take out the compost bin, forget to cover it? Even the outdoor brown bin in warm weather bred maggots and had roaches crawling around it. I even once had a raccoon Open it and knock the bin over as their fingers easily opened the cover. These are all scenarios that can and will happen. The benefits of mandated source separation are no match for the hazards to health and property and violations of habitability it will cause. We already are struggling with Pest Management to contain the increase in the roach and rat population. On site required separation is a bad idea and not the solution.

Comment added July 18, 2023 11:08am

Thomas Lopez

This is a stupid rule. Imposing internal storage does not solve the rat problem. Earlier and more frequent sanitation pickup is the only answer/solution.

Comment added July 18, 2023 11:23am

Petra Conte

What is the purpose of this additional regulation? Housing “organic waste” until collection day will create more of a rodent/roach problem which defeats the collection rule changes just put into effect that is supposed to curb the rodent problems.

Comment added July 18, 2023 11:24am

Corey

This will only make the situation more unsanitary. Rats are a huge problem already. Tenants don't follow recycling rules already. This is a bad idea.

Comment added July 18, 2023 11:25am

Ron Nahum

Need steel made trash bins all over and no more trash bags left for collection on the streets sidewalk. All trash stored for storage or for collection in steel trash bins just like in any other country in the world. That's the only way to get rid of the rots.

Comment added July 18, 2023 11:44am

Beverly Carroll

I oppose maintains bins inside apartments or inside buildings. While I agree that rodent infestation needs control, bringing bins indoors only moves the problem from outdoors to indoors.

Please go back to the drawing board for a better solution. Perhaps open the suggestions to the public. NYC has bright, creative people who may provide a yet undiscovered solution.

Comment added July 18, 2023 11:48am

Alan Cohen

The proposed regulation for collecting organic waste is not feasible for small residential buildings. Our building has no interior space which could accommodate such waste, and would have to be in a public hallway.

Comment added July 18, 2023 12:05pm

Steven Murphy

These regulations will make urban buildings much dirtier, and endanger the health of tenants by attracting vermin indoors.

Comment added July 18, 2023 12:08pm

Rashid Realty Co

Please be aware that this would place undue burden on our small building. We do not have the room to house containers to meet the demands required by this proposal.

Comment added July 18, 2023 12:08pm

Anesti

I have read the comments, and I am echoing my opposition to this measure. This idea may seem great in theory but in practice, it will lead to a sanitation nightmare for residents. Many residents will not comply with this regulation, if their failure to comply with standard recycling is any indication, and the supers and building staff will have to go through each garbage bag to separate out organic materials. This will be onerous and dangerous to the health of building staff. Not only this but having organic waste separated out and waiting in a building is an invitation for pests and rodents to feast on the waiting garbage, exacerbating the current pest issues facing the city. Far more logical would be for the city to place it's own organic waste baskets around the city for residents to use instead of making property owners and managers responsible for what should be all individuals responsibility to recycle and dispose of organic waste responsibly. If the city wants people to compost more, they should put more compost sites out and more often. Those proactive enough to go will hopefully do it correctly. But those who are indifferent will not do it correctly. Streetside bin that services the entire block, that would keep the odors and vermin out of the buildings would be a good alternate solution. Pinning this on owners is a scheme to penalize via fines the owners. This will only make the situation more unsanitary. Rats are a huge problem already. Tenants don't follow recycling rules already. This is a bad idea.

Comment added July 18, 2023 12:08pm

Kara Kelly

As a landlord of a multi-family building I fully support mandatory organics collection. We enrolled our Upper West Side building in the pilot program several years ago and restarted after the phase during COVID. Organics separation and collection is, along with putting garbage out for pick up in bins with lids, the most effective way to reduce the rodent population. On a block with a consistent rat problem, our building has not seen a rat on our property in years. The maintenance of the bins is small compared to the benefit of cutting down on the rodent population. We shared best practices with our tenants (freeze scraps, etc) and they are generally followed. The truth is if you really want to get rid of rats, then you have to stop feeding them by putting your food scraps in rodent-proof bins with locking lids. The knee-jerk reaction of complaining that the program is more work for building staff is short sighted. I do hope that as the program grows that pick ups will increase to more than once a week as we are completely filling up our bins each week. The brown bins should be made available to all.

Comment added July 18, 2023 12:13pm

agnes shepanzyk

This new proposed rule would roll back any progress that may have been made, only bringing the rat problem from the streets inside residential buildings. Do not bring composting into buildings and require more of us already. lower our taxes and you do your jobs! the city is asking too much from owners and not taking care of problems which they should be dealing with.

Comment added July 18, 2023 12:17pm

Lydia Korchow

It is very burdensome to adhere to this proposed legislation , because of the complaints and health hazard it would present- keeping organic waste in apartments and cellars. It would only add to the rat infestation because the rats would enter the inside of the buiding and cellar. The stench from moldy food waste would be horrific and present a health hazard.

Also the later set out times for garbage does very little to cut down rats BECAUSE THE GARBAGE IS PICKED UP LATER! Also, the street are dirtier since outdoor restaurant sheds were allowed– more dirt and food in shed that rats feast on — sheds hinder sanitation pickup and cleaning of streets.

Please address the rat problem in a more sensible and less costly to small property owners.

Thank you !

Comment added July 18, 2023 12:20pm

Linda Rustici

As a home owner we strongly disagree. People walk by our home a toss all kids of trash in our pails. We must sort the trash to make sure we do not get violations. Do not agree the the brown pail system

Comment added July 18, 2023 12:29pm

Elmer Vicuna

Why this NYC administration is making harder for owners, organic waste inside homes and buildings is going to create health issues for children and adults!! I DON'T SUPPORT THIS PROPOSAL !!!

Comment added July 18, 2023 12:29pm

Rachel E

Many of our buildings are smaller sized less than 8 units, we barely have room for garbage and recycling bins. Another area to be designated for something like this would be burdensome. Additionally, the possibility of more vermin and insects makes this not be a great idea.

If the people who are interested in this program are already bringing to a farmers market or somewhere else, I don't see the need to make this mandatory for everyone. They can continue to do this. If not move out of the city and live in the suburbs.

Comment added July 18, 2023 12:41pm

Lisa Guzzone

I own three residential brownstones in Cobble Hill Brooklyn. We do not have any space to store compost bins. It would only bring the rats inside

Comment added July 18, 2023 12:49pm

Chris Efthimiou

I understand the value of composting organic waste for environmental and pest-control purposes. However, the mandate to allow for pre-collection of organic waste inside a building that has a very restricted common area (such as many pre-war buildings do) is not feasible. Furthermore, moving organic waste to non-refrigerated/non-aerated indoor spaces will pose an environmental and sanitary hazard to all building occupants.

Comment added July 18, 2023 12:55pm

Leigh Ann

This is ridiculous. How are landlords who don't have the means/space supposed to store their tenants' organic waste?! How are they supposed to keep their buildings rodent free? The City/council Members never think these policies through enough where they take smaller landlords into consideration? Then people complain about rising rents...well landlords have to pay an exorbitant amount of money annually to keep up with these ever-changing laws. It's unreasonable and unfair. It only highlights how idiotic our Council Members are.

Comment added July 18, 2023 12:57pm

Louis mancione

Everyone needs to know that my lawyer was at a social function with many politicians and such. A local council woman was drinking and stated to my attorney that "NY PLANS TO MAKE PROPERTY OWNERSHIP IMPOSSIBLE AND THEIR PLAN IS TO FORCE OWNERS TO SELL TO TENANTS AND/OR THE GOVERNMENT" and if she was quoted she would deny and that because of her status she would be the one believed!! MARXISTS AND COMMUNISTS RUN NY!!!

Comment added July 18, 2023 12:59pm

philip grossman

This idea may seem great in theory but in practice, it will lead to a sanitation nightmare for residents. Many residents will not comply with this regulation, if their failure to comply with standard recycling is any indication, and the supers will have to go through each garbage bag to separate out organic materials. This will be onerous and dangerous to the health of supers. Not only this but having organic waste separated out and waiting in a building is an invitation for pests and rodents to feast on the waiting garbage, exacerbating the current pest issues facing the city. Far more logical would be for the city to place it's own organic waste baskets around the city for residents to use instead of making property owners and managers responsible for what should be all individuals responsibility to recycle and dispose of organic waste responsibly.

Comment added July 18, 2023 1:22pm

Billy Michaelides

As a property owner of a 6 family building I strongly oppose this new requirement. In a perfect world, this would work, in reality and in a practical sense, it will not. I constantly need to separate and organize regular trash from recycle and how long has this been in place? I can't even imagine the filth this will create and the constant cleaning I will need to do just to avoid vermin and insects. This will be yet another regulation that will lead all of us small property owners to sell. The current compost plan isn't perfect but please don't implement something that would require us to hold onto organic waste for extended periods of time.

Comment added July 18, 2023 1:29pm

Marcelo Bessegato

As usual the best ideas are not found in the extremes. Great idea for a modern up and coming new world society. If done correctly it could actually work. Problem is : the folks that line their pockets on our tax money, don't have the decency to pick a solution that actually functions. Fix that problem, the rest always has a solution.

Comment added July 18, 2023 1:41pm

joann Bo

I am strongly against this proposal. The rat problem in NYC continues to be out of control, and the addition of organic waste collection inside of apartment buildings will only make the problem worse. Until such time that the rat problem is addressed, this proposed regulation should be tabled. The benefits DO NOT outweigh the problems that will result from its implementation.

Comment added July 18, 2023 1:56pm

Djordje Zivan

this rule is a bad idea. we have a problem with rats outside, the new rule would create a problem with rats inside the building and also a bad smell inside the building, and the city would come back if is a complaint and issue a violation or a fine to the building owner. as a small property i am against these new rule is a bad idea. thank you.

Comment added July 18, 2023 2:02pm

Shirin Woods

I have been plagued by rats in Whitestone for the past several years. Each time we get rid of them (which takes several months) a new construction project begins(either by the city or a new home) and the process begins again. Rats come in the thousands, not the hundreds, all over the neighborhood and the problem will start again. Having organic waste inside will just add to the issues we are having. Not only do we have to pay to eliminate the rats, but during the process we will get fines up to \$300. The city just implemented new rules for garbage collection, which is adding additional costs. Now you expect us to house more rat creating bins and expect us to keep the rats away. I implore you to first get rid of the rat infestation in our neighborhoods before you begin to add to the problem with these new bins.

Comment added July 18, 2023 2:13pm

sandberg

I oppose this organic waste collection. We have a hard enough time managing paper and metal/plastic recycling. This will create an overwhelming and unsanitary nightmare. It will bring rats and vermin into the buildings. The city streets already smell like garbage; this will make the buildings also smell like garbage.

Comment added July 18, 2023 2:15pm

Beverly Carroll

I am opposed to the proposal. It will only serve to increase roach and rodent infestation inside buildings. I suggest that the Sanitation dept contact cities of comparable size that do not have street rodent issues and determine how they handle the situation. Select best model for trial in NYC.

Comment added July 18, 2023 2:24pm

Joe Ford

I am the owner/operator of a 6family home in Brooklyn. True sanitation is beyond the scope of what you are proposing. You are not including any remedies for the unsanitary and decrepit environment that will be created in apartment buildings(especially the small multi family homes) from the holding of organic foodstuffs. And the education of tenants' best practices necessary to successfully, and healthfully pull off what you are proposing is beyond the scope of landlord responsibilities.

The reality of this proposition is far different from it concept.

Please don't move forward with this before you present to EVERY LANDLORD and TENANT the best practices to accomplish this HEALTHFULLY.

Sincerely,

Joseph Ford

Comment added July 18, 2023 2:51pm

Robert Arzanipour

This new rule would be disastrous to the already difficult time small building owners have in fighting the rat and mice problems. We are having in the city due to the second Avenue construction. Bringing anything inside we further exacerbate the difficulties we are already having.

Comment added July 18, 2023 2:53pm

Sam chantly

No

Comment added July 18, 2023 3:21pm

Chris

This is a horrible idea and will impact taxpaying citizens.

Comment added July 18, 2023 4:13pm

Dominick Celano

This is another bad idea that the DSNY has come up with
Along with the sidewalk cafes ,bike lanes , and the brown containers for feeding the
RATS!!

This will only bring the rat problem from the street to inside the buildings
How about coming up with some real ideas on elimination of the rat population

Comment added July 18, 2023 6:38pm

Elisa DiMonda

WE ARE ALL AWARE AS ENLIGHTENED, KNOWLEDGABLE OWNERS OF BUILDINGS THAT THE MORE REGULATIONS HEAPED UPON US WILL EVENTUALLY SUFFOCATE OUR ABILITY TO MAINTAIN OUR BUILDINGS AND MAKE THEM LIVABLE FOR OUR TENANTS. LANDLORDS ARE PEOPLE WHO CONTRIBUTE MONEY (THROUGH TAXES), DECENT, COMFORTABLE LIVING CONDITIONS FOR THE CITIZENS OF New York City WITH WHOM THEY LIVE. THE GOVERNMENT AND ITS REGULATIONS ARE DESTROYING THE GREAT CITY OF New York. New York WILL BECOME A GHOST TOWN WITH ONLY THE HOMELESS LIVING ON ITS STREETS. HELP THE SMALL PROPERTY OWNERS MAINTAIN THE CITY. THIS PROPOSITION IS A HEALTH HAZARD AND NEEDS CONSTANT MAINTENANCE. THE TENANTS HAVE DIFFICULTY SEPARATING THEIR REFUSE. THIS LAW WILL CONFUSE THEM AND CAUSE THE OWNER TO DEMAND THAT THE TENANTS HAVE ANOTHER RULE TO FOLLOW. SAVE NEW YORK.

Comment added July 18, 2023 7:14pm

Kim Esposito

I understand , but do tenants give a damn. Absolutely NO. I have problems with the regular recycling. Who puts cardboard in the wrong city container. Plastic in garbage. Who gets the summons the little landlord. I have two buildings 8 families each. One building is not even 8,000 rent roll. It's so hard give us a break. Everyday I am going through garbage making sure it's in the right containers. Plus you have people going by dropping stuff in your pails. I am tired being a small landlord in Brooklyn. I live right across the street to these buildings , I do the best I can . I am one tired landlord in Brooklyn. Every day a new rule for me to follow but not the tenants. Even though I have everything labeled. Notes in hallways. Most of my tenants have been in these buildings for more than 20 years. I am tired. Had to put a new boiler in one of my buildings last year cost me 35,000 . New York City needs a better system. Insurance went up taxes up electricity up. And I pick through garbage on to make sure I won't be penalized. Sweep my sidewalks worrying I might get a ticket . I am a small landlord can't afford a crew of workers. Between basic plumbing problems. Making sure all air conditioners have brackets. Telling them they can't put them in fire escape windows . Plus bed bug reports , mold reports, registering the building. Tired! tired! So in response to the new request . Not a good idea. How about the tenants have to go to a site and dispose of their organic products. Well my last thing is different rules for small home owner to these big buildings. There is a lot of gray here. I hope you read this if you ever reach out to me,

Comment added July 18, 2023 8:10pm

K Diomataris

As a property owner, I strongly OPPOSE this. My tenants can't recycle correctly, they will not follow the rules for this. The rats and maggots that will enter the building is not acceptable. Why should we have to live under these conditions? And who will get the tickets when the tenants do not follow the rules? Why should I have to go through others garbage so that I won't get a ticket? This rule does not make sense. You will be making the rats find their way into our homes. Who wants to live with that? I can tell you that I don't and all of my tenants don't!!! Please do not pass this.

Comment added July 18, 2023 8:22pm

Jack C Pliskin

I am against this proposal to amend DSNY rules because residential buildings would be the depository site of this organic waste for extended periods between scheduled sanitation collections. Residential buildings would be required to establish organic waste collection bins onsite- with most buildings being forced to keep these organic collection bins either in individual apartments or in basements given limited storage options and outdoor access. Earlier this year DSNY adopted new set out and collection rules for residential buildings to mitigate the City's rodent problem. This new proposed rule would roll back any progress that may have been made, only bringing the rat problem from the streets inside residential buildings.

DSNY needs to come up with a better set of rules to address these concerns and scrap the rules it is proposing here as part of its plan to amend its rules.

Comment added July 18, 2023 9:52pm

ROBERT PELC

Terrible plan. Organic waste decays naturally. Making a separate collection fir this will only attract more rodents in and outside of buildings. The cost of rat mitigation will exceed the cost savings of this bad idea.

Comment added July 19, 2023 1:15am

R San

I oppose this new rule.

Do you really want to solve the rat problem in NYC? There's a simple solution and nobody is thinking about it. Eliminate the source, the number of garbage bags out for collection. Go back to providing the sanitation services NYC needs.

The simple solution is to have sanitation pick up garbage like they used to do many years ago. Pick up garbage six days a week. Garbage storage inside buildings or garbage on the sidewalks are the reasons that we have a rat problem.

There is no reason for property owners to be FORCED to compost. Tenants don't comply. Let the tenants who want to compost bring their food scraps to a city bin on public spaces. Compost bins should not be kept inside a property owner's building. This was tried and it failed a few years ago. Why would you think that it will work this time?

Will you be forcing property owners and their staff to go through tenants' garbage? That is demeaning, unsanitary, unhealthy, and plain disgusting.

Don't do this. The unintended consequences will be horrendous.

Comment added July 19, 2023 1:38am

Frank Cavazzini

I am NOT in favor of the full extent of this program as it now moves rats from outside to the inside of homes/basements where landlords will be forced to store between pickups. A reasonable approach would be to have large bins set on one corner at intersections for residents to deposit their organic waste there. It will reduce the amount of sanitation trucks on the street, limit start/stop of the sanitation trucks and a host of other benefits doing it that way.

Let's be progressive and not doom this program. Do it right and everyone will be onboard.

Comment added July 19, 2023 2:21am

John

I know my comments are useless and you will do what ever you want but I'll try. We have a limited amount of space for trash receptacles and cannot separate "organic waste" bins from the rest of the trash. Please understand this is a challenge and will add to our burden.

Thank you,
John

Comment added July 19, 2023 7:04am

John

First you say rats are not going after garbage to eat after 6 pm. Since they don't eat after 6 pm, now you want to give them a dinner inside of our buildings. Who is making these crazy laws for our once great city of New York.

Comment added July 19, 2023 7:26am

Meliagros

This is the craziest plan I have ever heard. The city is trying to control rats and so are landlords. This would make it impossible to do and would encourage roaches. Why does the city keep putting burdens on the landlords and on their workers? This will not curve rats. They will go into the residential units to find the food. We can't get rid of them even with traps around the building and now they want to bring the rats indoors.

We have no money to hire others to do it or keep track of all this. It is bad enough that the Super has to get up at odd hours just to put the trash out on the new time slot.

No one wants the smell of this organic material anywhere in or near their building. Tenants will surely complain. Tenants live a restricted life in their apartments, their lives are in danger walking home. They do not need to come to a place that stinks too.

The apartments will fill up with rats, and roaches causing an added burden to the landlord for extermination on a weekly basis that they cannot afford. Expenses are over the roof as it is.

Comment added July 19, 2023 8:41am

Marie

This idea will make the rat problem worse.

Comment added July 19, 2023 8:47am

Ann Korchak

I'm currently serving as Board President of SPONY, The Small Property Owners of NY. I'd like to share with you the problems multi-family building owners and their maintenance staff will encounter if these new regs come to pass.

NYC has been recycling for many decades and yet we still have tenants that don't know how to sort properly. This means that several times a week my super or a member of his team sifts through the trash and sorts the items properly. This process is time-consuming and messy. If items are missed we are fined by DSNY. The fine is borne by the building owner, not the tenant.

Composting will require a major level of cooperation from the residents of a multifamily building. It will involve a huge learning curve and behavioral changes. The residents in my building who still won't sort paper/cardboard, glass, and aluminum products are not likely to begin composting. It's not fair to put the burden of removing compostable material from the trash on the maintenance staff and it's not fair to fine the building owner when it will be impossible to know which residents are not composting properly.

Finally, I'd like you to put yourself in the shoes of the hardworking building superintendents and building owners that run their own properties (as many SPONY members do). The task of physically removing food waste from tenants' trash bags and adding it to the composting waste bin will be messy, unsanitary, and simply GROSS. A better solution would be to expand public composting options and those NYC residents that are willing and able to compost can do so easily. These are the people that will take the time to do it properly and will lead others by example. As more public options are made available others will come to see the ease at which they can compost and the value of doing so. After we have created a culture of composting it will be easier to roll out a multifamily building composting requirement.

Comment added July 19, 2023 12:15pm

Betsy Bates

This is a terrible idea. This will encourage rats, roaches and other insects to come into basements and spread throughout the building. Olus who is going to do this in smaller buildings. Even if you hire someone, they do not like doing this. This idea is nuts. You are only making the rat and roach problem worse.

Comment added July 19, 2023 3:30pm

Ada

I strongly oppose this proposal. The brown bins in the Williamsburg area are filthy and bring maggots and flies. Furthermore, people place regular garbage in them. This should NOT be a responsibility of the landlord, especially when programs for composting already exist. NYC also has not sufficiently addressed the rat problem which is out of control and attempting to add this is ridiculous. Outside dining and its garbage is a larger issue that needs to be addressed in this city. Attempting to bring the rat problem to the front door of residential buildings is irresponsible.

Comment added July 19, 2023 6:00pm

Steve christofori

Stop the nonsense, the rat problem will never go away all this us is another way to make it harder on the people who live in nyc

Comment added July 20, 2023 6:06am

Magdalene Jacobson

As a property manager having been fined for rodents when we have rat boxes and pay for a monthly exterminator on top of everything, the rodent problem is put on landlords instead of the city. This is just another way for the city to fine landlords. They should have dropboxes for organic matter in certain locations. Just like recycling centers. If they are going to put the onus on landlords they need to create rat proof containers that should be available to owners at a deep discount.

Comment added July 20, 2023 7:57am

E R Hylton

This while it may sound like a step forward; just places the burden of maintaining the garbage on the homeowner, and janitorial staff who are not prepared to house this garbage. It would require a separate area to house, time to monitor, and eventually put out for recycling. It would make much better sense to get this in the hands of the sanitation department which are much better prepared to maintain, prepare, and recycle this type of waste.

Comment added July 21, 2023 7:34am

LT

As a multi family property owner the layers and layers of legislation are far and beyond our of control. Enough is enough!!! This new restrictive law will aid and abet the proliferate of the intense rat problem in NYC esp in Manhattan as we have nowhere to store food scraps which are already BIODEGRADABLE BY DEFINITION. This is overkill!!!! Most of the recent legislation emanating from Progressive/Socialist members of NYC Council is aimed at hurting landlords and ultimately squeezing them to the point where they have no choice but to walk away from their own investments or learn to live with politicians pushing back on private ownership. It should be duly noted that NYC is THE worst landlord in NYC-just reflect on the lack or proper adequate management in NYCHA system so they should be the last to tell private sector what to do nor how to do it. Irony is that when the CofNY can no longer handle its property responsibilities it reaches out to THE PRIVATE SECTOR...terrible disregard for professionals in real estate.

Comment added July 22, 2023 5:27pm

Charles M

I think this is a nice idea in a bubble. But not in the reality we live in right now.

The city has been rolling out new laws and regulations for years to “help”, but with Terrible implementation. This just seems like another way penalize small businesses and landlords. It’s a shame in recently years the city has done nothing but push people away. many good hard working families who called this amazing city home feel slighted now.

It’s hard enough right now getting tenants to sort their garbage and recycle correctly. Why make up this “tall tale” about helping the environment, Addressing rats and other rodent issues all around NYC. Those running the city right now are looking out for certain interests and passing the buck onto home owners and landlords once again.

Yet another Crappy idea to me to double charge people here in nyc for something sanitation has been paid or contacted to address!

Comment added July 23, 2023 1:30am

Kerlyn Candelario

Single family and Two-family homes should be exempted from this requirement. It will just add more unnecessary burden on homeowners.

Comment added July 23, 2023 11:54am

Lee Solomon

I am a small landlord and cannot afford the kind of staff needed, and do not have the space in my buildings for, the sorting necessary for organic composting. I encourage nyc instead to add more compost bins on city streets. Tenants are using them now but there needs to be more of them to accommodate the demand. Having organic compost collecting in front of buildings in bins that are impossible to wash out because of building facilities that prevent that will add to the rodents and the smells that are already an issue in nyc in front of homes and are unfair especially in areas where there are many multifamily properties. Why doesn't nyc parks operate large scale compost facilities as well so people can be more involved in the process directly and understand what it means and where it can be used?

Thanks for your consideration of these ideas.

Comment added July 23, 2023 4:52pm

Jake Kajo

This is yet another proposal that will not work and just make life more difficult. Most buildings, especially the smaller ones do not have a lot of space inside the building. They do not give access to the residents, and this will only bring rats inside the buildings!! This does not make sense at all. The new times to put out the garbage were supposed to fix the rodent problem, but apparently it didnt. So now you want to put band aid above band aid. Roll back the laws that didnt work for this problem then.

Comment added July 23, 2023 6:11pm

Mariusz Mrzyk

Another burden on Landlords that will not resolve anything.

Comment added July 25, 2023 9:16am

Isabel Pedras

This is a horrendous idea that will leave rotting food all over trash areas and in the street during collection. As it is, people don't recycle and we have to waste time and resources sifting through trash to sort it. Now, we have to somehow scrape their leftovers into a compost? And in the winter we won't be able to hose down the area or the bins that will attract rodents and other pests. Also, rotting food that spills onto the street is poisonous to dogs. This is just an excuse to give sanitation another excuse to dish out fines.

Comment added July 28, 2023 8:38am

Janice Gordon

I oppose organic pickup at this time! Please do not require organic waste storage and collection until you solve the already dire rat problem! the 8:00 pm pickup time is a burden for us now and is increasing the rat population!! No organic pick up yet!!!

Comment added July 28, 2023 8:44am

Vicki Sando

I'm a small landlord in Greenwich Village with 8 residential apartments. I also live on my property.

Recently, I started using the new curb composting bins within walking distance of my building. It's been eye-opening how much organic waste we collect every day. Every night, I take a bag to the compost bin. (the system is fantastic!)

My regular garbage volume is significantly lighter and doesn't smell in the hot summer.

I've also encouraged my tenants to sort their trash, too.

I'm in favor of residential compost collection. While my tenants will have a learning curve, if their waste is sorted and sorted properly, there won't be additional storage needed.

Additionally, mitigation of pests might actually be easier if food waste is stored solely in one or two bins and disposed of quickly.

Our planet is burning. Methane from garbage is a leading cause of rising temperatures. We all must sacrifice some convenience so that our children can have the future they deserve.

Thank you!

Comment added July 28, 2023 8:45am

Nan eisenberg

I oppose this idea. It will create enormous headaches for storage and basically defeat our most important goals. Thank you.

Comment added July 28, 2023 8:46am

George Bonheur

We have no place to hold organic waste & don't know if tenants will follow up on the this rule, subjecting us to violation by DSNY. Holding the waste in the basement or any other place for an extended time becomes liquified , causes noxious gas, and otherwise makes a big mess to handle & transport. Please reconsider enacting this law.

Comment added July 28, 2023 8:47am

Donald Tsang

My building was built in the 1900 in lower Manhattan. It was built without allocating space for garage cans in the front of the building. Each apt is small and approximately 550 sq ft. With the three garbage pickup days per week, the tenants are already struggling storing garbage and Amazon boxes (pick up one day per week) in their apts. if they have to keep rotten food for composting in the apartments, please imagine the smell inside. Additionally, the smell will attract more roaches and rodents.

The composting may work for private houses. At least, they can put the compost outside in a seal can.

I'm all for saving the environment having to deal with global warming. Please make rules and regulations that makes sense and not to use it for political gains.

Comment added July 28, 2023 8:54am

Grace Dilenna

This is very concerning. How is this going to prevent/decrease the rodent population. The rodents will be running rampant with putting this law into effect. This is what they need to live and this is exactly what they'll be getting to thrive. This clearly has not been thought out well. If this law goes into effect it won't be long before we'll have massive rodent populations everywhere. I recommend rethinking this and not implementing this legislation. Please do not implement this, and if you do surely it won't be long before it will be stopped/ canceled

Comment added July 28, 2023 8:59am

C. Park

I oppose this proposal though I support composting and working to clean up our environment. The resulting exacerbation of the rat and pest population is more hazardous and detrimental than not having everyone compost. It is reasonable for those with a private home and a yard or outdoor area to keep it but where are apartment buildings supposed to collect and keep organic matter? In common area hallways or basements? Requiring this of everyone is simply unreasonable and foolish. It should be voluntary and highly encouraged if your property can support it but many cannot!

Comment added July 28, 2023 9:05am

Charisse Daus

As the owner/manager of a multi-family residential building in Brooklyn, I am strongly OPPOSED to this composting proposal. Such a measure would place undue burden on both tenants and landlord, as well as create a situation conducive to various types of vermin. I can't think of any tenant who would be happy to store organic waste within his/her individual apartment, and basement storage is not feasible for our elderly tenants who are not able to access this area physically. While the desired environmental impact is commendable, the practical side leaves a lot to be desired, and is sure to create or exacerbate other troubling issues such as rats, mice and roaches. This is in addition to the challenges of having to enforce the requirement among the tenants.

Comment added July 28, 2023 9:33am

Karen Baskin

I strongly oppose this potential legislation.

This proposal seems to fly in the face of the city's efforts to reduce the pest population – rats, mice and roaches. Organic waste can be a breeding ground for pests not least of which will be maggots and disease carrying flies. The smell during hot months will be obscene.

What will be considered 'organic waste'? Produce? Dairy? Meat? Leftovers? The thought of keeping any or all of that in an apartment is repellent. Space is very limited in many buildings and asking tenants to keep organic waste within their small apartments for a week or more may pose a health hazard to them and very difficult for landlords to enforce.

While I appreciate the city's effort to reduce waste, I implore you to offer a safer, more reasonable solution.

Comment added July 28, 2023 9:37am

Louella berliner

Organic waste quickly starts smelling bad and attracting flying insects and vermin. We should not invite such pests into our homes.

I strongly plead with the city to provide outdoor organic waste containers—one on every block

Comment added July 28, 2023 9:55am

Boro Stipanovic

Sanitation should collect all kind of garbage every day, even two times . Storage of organic or any kind of garbage is not acceptable in civilization culture. City states and federation have to make more active and permanent program how to collect urban garbage.

Comment added July 28, 2023 10:02am

john wilson

bad rule, good rule for the rats.

Comment added July 28, 2023 10:26am

Joseph Cunin

As the owner manager of a small (6-family) residential building, I would like to state my opposition to Mandatory organics recycling. Storing organic material at the property for once-weekly collection is a recipe for problems. Maintaining a clean and vermin-free building is challenging enough without adding the requirement that I provide organic waste storage and collection location. If tenants want to participate in organics recycling, they should be responsible for storing the material in their apartments and placing it curbside at the appropriate time.

Comment added July 28, 2023 10:36am

Elizabeth R.

An absolute NO !!!! This rule will worsen the city rodent and pest problem and will definitely create feeding centers in our buildings. We can not have rats in our buildings. The Sanitation Department needs to do their job and pick up the garbage and most importantly the public garbage bins/pails on the street corners that are filled to the brim with food waste (this is completely disgusting) This coupled with the street sheds are MAGNETS for rats. As someone commented below do something about RAT ABATEMENT. This is completely ridiculous and unfair to impose this.

Comment added July 28, 2023 10:47am

Angelo Vita

Keeping organic waste longer than you have to in an extra bin is a recipe for disaster. It basically will be a food bin for vermin. Please reconsider.

Comment added July 28, 2023 10:52am

Luis Gil

This is impossible for most residents. We already have to keep trash in our apartment for 2 days bc the city o Ku picks up twice a week. It'll only attract more roaches and rats.

Comment added July 28, 2023 11:22am

ALEKSANDAR TOPOLOVACKI

I have NO place for more bins for organic waste.
Many tenants anyway not follow instructions –
where put recycle and separate from other garbage.

Comment added July 28, 2023 12:24pm

VASILIKI FALIDAS

I'm against this new proposal
– tenants will not follow the rules. Landlords will get more violations
– create infestation problems into residents.

Comment added July 28, 2023 12:33pm

John Lewis

We are already having to keep garbage in the apartments for two days before City pickup. Keeping organic waste will cause more hardship and attracts pests in an already dirty and pests infested neighborhood.

This is not doable for apartment dwellers!!!

Comment added July 28, 2023 1:00pm

Larry Moskiwitz

Please...

Where should I keep it without stinking up my hallway.

I barely have room where to keep the garbage cans!

Should i build a new building “for this organic jihad”?

Where should i get the money for the new building? From the 3% appx rent increase?

Please! Please! Some common pragmatic sense!

Thanks

Comment added July 28, 2023 1:38pm

Salvatore Calderone

I strongly oppose the proposal as it will act in direct conflict with LL 55 of 2018 and will increase the potential for vermin infestation in buildings. Storing organic waste in individual apartments and basements is not the solution. It will only create health and safety problems for tenants and landlords.

Comment added July 28, 2023 1:39pm

Robert Eberhart

This proposal is especially unworkable for a small multi-family building in NYC. Despite limited storage and extended sanitation pick-ups, we cannot keep organic garbage separate. The policy will encourage vermin, puts the onus on building staff to separate tenant refuse, and just gives NYC sanitation inspectors another option for harassing small landlords with garbage tickets.

Comment added July 28, 2023 2:02pm

Leslie Leong

This is a well intentioned attempt by NYC to implement something without any thought to the costs and practicality of the proposed rules. You are asking building owners to handle organic wastes in their buildings without an regard to what is required to do so.

1. Additional manpower and costs – this is an additional task that will require personnel, equipment, and time.
2. Containers
3. Health concerns: vermin and pests
4. Space to store rotting, smelly organic waste – we are lucky to have space to keep normal garbage until collection times.
5. Tenant compliance – landlords will be made responsible with no power or authority to compel tenants to comply. Landlords will be forced to handle organic waste mixed with trash. And will be penalized when the containers are found to contain anything other than organic waste.

You are asking us to be Sanitation Department inspectors without any authority to compel tenants to comply – so we will get the fines that will inevitably be levied.

All these and more reasons make a positive idea a dumb one in implementation.

Comment added July 28, 2023 2:45pm

Adam

so lets get this straight! you propose to take the smelly parts from the 2 days of garbage pickup, and keep it marinated for the whole week for one pick up a week inside my building... so adam's solution is – lets take that stench that attracts the rats twice a week on the street because garbage people let it sit there for hours, and put it inside of my building so we can have the smell of rotten food to enjoy along with pleasure of being attacked by rats!!!

This as brilliant as allowing kids and anyone who has no idea how to behave in traffic to ride electric bikes to our streets and blame cars when someone gets hurt!!!

If I'm not being clear – there is not a single BRAIN CELL in NYC government. The only logical thing to do is to fire everyone and start over!!!

Comment added July 28, 2023 3:01pm

Gabriella Souza

I respectfully reject the proposed separation of organic waste.

The stored waste would attract both roaches and rodents.

Comment added July 28, 2023 3:30pm

Jack Baradar

I strongly disagree with this law

Comment added July 28, 2023 4:17pm

Rena Wasser

The New York City Department of Sanitation (DSNY) new proposal, Int. 244, for the creation of a citywide organic waste curbside collection program would be a huge unfeasible burden to small property owners and their maintenance staff. We have no place to store organic waste for extended periods between scheduled sanitation collections. Storing them inside the building would be unsanitary and create an opportunity for rodent infestations. Additionally, it will be nearly impossible to educate NYC tenants to start to separate their organic waste. I can say with certainty, that tenants will not sort their organic waste. Who will educate them?? This would leave the building staff, already burdened with re-sorting recycling our tenants neglect to sort, to remove the organic waste by hand from the garbage bins. This is highly unsanitary and nearly impossible thing to do. This proposed law makes no sense.

Comment added July 28, 2023 5:35pm

Harold Moy

Do NOT support! Saving this type of waste in the buildings will create more vermin problems and create more storage issues (more containers, etc)!

Comment added July 28, 2023 10:45pm

Martin

Compost bins make the block smell like death. Flies and maggots are all over . I hate to think what putting the bins in cellars would do. I suggest putting drop off points around the neighborhood . A place where people can drop off e waste, batteries, compost etc.. and for the people that can't get to the location , have a number people can call and have one of NYC strongest pick it up . Thank you , Martin Fernandez.

Comment added July 29, 2023 2:12am

Helen

Since compose started, the rats started. We never had rats in our basement until compose. Plain and simple.

Comment added July 29, 2023 8:13am

Jane

This sounds like a poorly thought out idea. Composting, like recycling, is a good thing, but if not executed properly it's literally a waste of time and resources. Without continuous and mandatory education, you will end up with whole batch of recyclables/compost ruined because it's contaminated by stuff that wasn't supposed to be in there. (Happens now with recycling). Without proper administration like frequent pickups, you get piles of vermin infested trash in an incredibly dense city. Do central drop offs, frequent and effective, and then educate educate educate. Mandate how to compost first in schools at all levels, and make sure there are available compost dropoffs so that every student can bring their family's compost to dropoff site. Isn't that the point of being in a dense urban city?

Comment added July 29, 2023 9:24am

Kathleen Elvin

We have tried to participate in composting recycling. Not a single tenant participated and threw out with regular trash. Requiring composting separation is going to compel owners to go through tenant trash and remove organic matter. This is both near impossible and detrimental to owners health.

Comment added July 29, 2023 9:38am

Pamela Wolff

It is sad but true that New Yorkers will not all be able to comply with the proposed rule. I have come to believe that the best solution is already being implemented. The street corner bins that have appeared in Chelsea are a great step toward solving the food waste issue, and one that all NYers that are inclined are able to access with the app. I have found it easy to do.

I store food wastes in my freezer and use the bin at my corner once a week, at any hour. Requiring building maintenance to take on one more chore is not a viable approach. Perhaps allowing willing buildings to sign up for the program rather than forcing the plan down all throats would be a good start.

Comment added July 29, 2023 2:37pm

Marcelino I Lake II

In favor of the separation of organic waste; tenants can place the waste in separate bins. Owners should have to store bins for an extended period of time. The city must create a plan to pick up the waste.

Comment added July 30, 2023 10:09am

Kelly G

While quite valid, stating the cost & difficulty to comply are not enough reasons to oppose this rule. However, the complete stupidity of it is. Rotting food that is collected twice & in some cases three times a week must now be stored indoors for an entire week! Where do you propose it be stored? Next to the boiler where it can be kept warm for the rats that have moved in? The city will then claim victory over the rat problem because they're no longer outside. Buildings will also be infested with flies & maggots. The pervasive stench will be intolerable. This rule is obviously created by someone with ties to the exterminating industry because they're the only ones who'll benefit. Those in favor are singing the praises of the current pilot program. Yet they voluntarily bring their food scraps to bins OUTSIDE. This rule should first be tested in government owned residences so the effectiveness can be properly assessed.

Comment added July 30, 2023 10:45am

Irving Friedman

I feel very strongly that the separation of organic waste would not only impact our supers and porters, but would greatly be a cause for further rodents issue. As is, we have difficulty making sure tenants separate the regular recyclables, and when our staff must do it we lose time in ensuring better building cleanliness as well as time to make repairs for tenants as needed. This law would further impact as well as being degrading for our staff to go through tenant's garbage bags and sifting out the organic waste. Our Staff are treated as people not animals who sniff out garbage bags.

Comment added July 30, 2023 12:22pm

Liliane Martin

This is only an acceptable solution if the organic waste gets picked up at the same time as the regular garbage. If we have to store organic waste for more than a few days, the smell will be overwhelming and it will attract rodents.

Didn't we try to do this with the brown containers in the past? Why didn't it work? Why should we try a failed experiment a third time?

Thanks for your consideration.

Liliane Martin

Comment added July 30, 2023 5:41pm

Ingrid DuBois

My billionaire landlord refuses to provide a disposal bin for organic waste because he cannot make money at it. Providing this bin should be required by law for ALL building owners. In office buildings, renters that do not use the recycling bins after they become mandatory should be FINED. (In residential buildings this waste could not be tracked to a specific apartment, alas.) NYC's recycling "efforts" need much improvement in a troubled world.

Comment added July 31, 2023 7:30am

S. Cummings

Dear Sirs/Madams:

As I recall there was a test run of the composting bins in Brooklyn and parts of Queens several years ago, circa 2017.

The idea was great but the level of participation was low, and the brown bins were removed.

To now attempt to enforce this composting and place the burden on landlords who are already overwhelmed with non paying tenants and a backlogged court system is outrageous.

There are tens of thousands of water bottoms and plastic containers to be properly disposed of and environmentally replaced with biodegradable materials.

Do not place more unrealistic pressure on small landlords. Start with teaching the public the benefits of composting and reward New Yorkers with refund points if they bring their perishables to a designated location – where perhaps after 10 visits they receive a gift card for food or plants.

Landlords and homeowners already have to disrupt their dinner and family time to place trash on curb after 8p. Now you expect us to rummage through personal trash and separate God knows what from salvia saturated food leftovers??? UNSANITARY AND UNHEALTHY!!

Figure out other longterm solutions and come up with other plans for a Greener NYC...

Health to You and Yours

I have lyrics to theme “New York, New York” but it appeals to New Yorkers to recycle and take care of Planet Earth...

Contact me directly if interested in starting a campaign to teach composting and recycling.

Regards
Concerned New Yorker

Comment added July 31, 2023 3:51pm

S. Cummings

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Regards

Concerned New Yorker

646.713.9108

Comment added July 31, 2023 3:55pm

Manuel Martinez

I'm a property manger for a 100 multi-family units in the Bronx, NY.

I strongly OPPOSE this proposal as it is quite difficult to get the tenats to cooperate in composting despite all of efforts.

Not only would we need new and sufficient compost bins, we would need to deal with vermin: maggots, roaches and of course mice/ rats. Holding compost for any period of time would lead to the infestation of vermin into the bldgs and APTs.

The practicability of this idea is in effective and inefficient.

Again, I strongly OPPOSE this proposal.

Comment added August 1, 2023 2:23am

Frances

I oppose this rule. This should be an all hands on efforts. However, currently tenants do not recycle properly let alone expecting them to maintaining storage bins in their apts for composting. In addition, whether these bins are outdoors/in basements or in respective apts they will emanate foul odors that will radiate widely, this will result in attracting more mice, rats, maggots, insects, etc. In addition, please keep in mind, tenants never securely close lids, this will allow rodents access to this composite. Unless you're able to effectively mandate this law with tenants (not only landlords) it's a plan that will shortly after implementing fail. Please reconsider. We need long term solutions not short term plans.

Comment added August 1, 2023 9:09am

Thomas Lopez

The proposed plan will not solve the problem of rats infestation or waste disposal is inadequate. Basement storage will only cause increased rodent or other pests within buildings and add to owner expenses which will drive up rents. The only real solution is to increase sanitation pickups and disposal. Shifting costs to owners is not right and will drive up rents.

Comment added August 1, 2023 11:27am

Alice Dear

I recognize the immensity of the rat problem in New York, however I strongly oppose this legislation that will invite rodents into our homes with requirements that we store organic waste inside!

Comment added August 2, 2023 8:33am

Patricia Attara Marchetti

The storage of organic waste indoors will attract rodents which pose additional problems for both the tenants and the landlords.

Comment added August 4, 2023 8:10am

Alison Bradshaw

There are several problems with implementing this proposal universally on all sizes of buildings:

1. Our small 3-story 1870 building has little room for the 6 bins you demand. With a front stoop, a gate to basement stairs, the 4 bins we already have, each fitted with plastic bags and tops, take up most of the frontage. With 2 large bins for Designated recyclable metal, glass and plastic, and designated recyclable paper, and 2 bins for household trash, you would think that was enough for the 4 tenants, as the bins are emptied 1-3x/week. But they are regularly overwhelmed by -strangers for their trash and their dog shit, – people from the large school opposite – the kids and parents use our bins. and are sloppy, – some neighbors in nearby buildings, even though this is illegal, – and tenants fail to put trash properly, and fail to cut cardboard into sizes to fit into the recycling.
2. Requiring this small building to put out two more bins (for Designated yard waste and Designated organic waste) makes this small residential building look like a garbage dump, and would smell like one too.
3. There is no room inside for storing any waste in the narrow central hall or in the basement which is private (as part of one apartment).
4. The idea of putting bins in the back of the building at the 'garden' level is absurd – there is no tenant access to put anything in so how can a bin there be used? and the possibility getting a super to first collect, then store, and further bring any size bag or container across the length of the building through the back and front cellar doors, and up a set of narrow stairs, is not s well thought out proposition
5. You do not address the problem of the passers-by. You could make this situation better by – allowing a Landlord to fine tenants for non-compliance, [names are on the papers]- allowing a Landlord to get a fine registered for a neighbor who mis-uses their bins, – fine dog people for failing to put their waste in proper bins, – allow for Landlords to report and fine dog-owners for allowing their dogs to poop on the sidewalk and failing to pick it up, – and fine car drivers parking in front of the building and leaving trash from their cars on the street, or on the sidewalk – – remove the requirement that a Landlord be responsible for trash 18" from the curb, (and yes, the city gave us a \$100 fine for such trash on the street which had been hidden by a parked car until the driver moved it after our super had attended to the trash bags) – put out more city-operated garbage bins at every corner, not just on some corners. The city regulations put far too much responsibility onto a Landlord for actions that are neither possible for a LL to control, or to know about, or to prevent. You allot fines to Landlords for sidewalk and street cleaning that unfairly assume they are responsible when it is the actions of many other people which cause the trash problem.

Comment added August 5, 2023 11:48am

Ricky Zegelstein

We have 4 small brownstones and our commercial tenants have the basement. We are not allowed to keep trash near the stairwells as it is a hazard. The commercial spaces wouldn't want trash cans/containers in front of their windows and there is no separate space to put them anyway. The commercial tenants leave before 8 pm and the new rules with times are hard to abide by. My cleaning person is gone by 4 so he doesn't have a place to store everything and won't be around at 8 pm. Very difficult to follow the rules.

Comment added August 6, 2023 11:42am

Gregory bronner

I live in a building that is 16 feet wide. The garbage can storage area is already overburdened with three cans for garbage, metal, and paper, and we have a terrible rat problem on the block. Adding another can of rat food that will almost never be used by my one tenant is a waste, considering that there is a secure organic collection point 100 feet away. This regulation is a burden and needs to be limited to larger buildings.

Comment added August 6, 2023 2:28pm

Lilibeth

So many people are complaining that this invites rats, smells, vermin, etc. but that's part of the point: *Separate/recycle organics (that people will trash anyway!) in sealed containers* This is so that we can build up the infrastructure and reuse our organics as a resource not as trash. So many mention this but it's either a misconception or ignorance that organics recycling will invite pest issues. (like these names: Ed Rich, Michael Peters, Christopher Athineos (you're right – there needs to be education on how to best keep bins clean and use bag liners.), Paola Zacharakos, Leonard Fox (check out DSNY Smart Bins), Kris Tapper, Ameet Sachdev (brown bins don't have holes at the bottom, IRENE KNECHT, JRC Xuereb Mark Gigi Porcelli Derrick Jackson Bernadette Dinaria Feggarpoulos Petra Conte Corey John Green (this is an attempt to *reduce* trash, Nan schiff eisenberg, Jo Wo (the point is that this will put more compost sites out for residents). Michael Peters (yes, education and coordination of labor power))

Check out what Kara Kelly said about best practices. Also, check out your borough's SWAB (Solid Waste Advisory Board) and other organizations that are helping to make this program a success as it has worked in so many other cities/countries.

Comment added August 7, 2023 7:54pm

Jean Bradshaw

This cannot work all sizes of buildings:

My 28' wide brick building is completely crowded with: the stoop, the 4 bins we have, the gate to the basement stairs, a garden triangle. Two more bins makes this small residential building look like a garbage dump, and would smell like one too. The 4 bins, emptied 1-3x/week, are regularly overwhelmed by 1. strangers for their trash and their dog shit, 2. people from the large school opposite 3. the kids and parents use our bins. and are sloppy, 4. some neighbors in nearby buildings, even though this is illegal, – and 4. tenants fail to put trash properly, and fail to cut cardboard into sizes to fit into the recycling. Inside? The narrow central hall cannot hold any bins without being a fire hazard. The basement is private (and has the boiler room, etc.

There is no back of the building at the 'garden' level .

You should look into the problem of the passers-by dropping garbage, The city regulations put far too much responsibility onto a Landlord for actions that are neither possible for a LL to control, or to know about, or to prevent. You allot fines to Landlords for sidewalk and street cleaning that unfairly assume they are responsible when it is the actions of many other people which cause the trash problem.

Why not have a Landlord report or fine tenants for non-compliance, – get a fine registered for a neighbor who mis-uses bins not their own, – fine dog people for failing to put their waste in proper bins, – fine dog-owners for allowing their dogs to poop on the sidewalk and failing to pick it up, – and fine car drivers parking in front of the building and leaving trash from their cars on the street, or on the sidewalk – – remove the requirement that a Landlord be responsible for trash 18" from the curb, (what about the \$100 fine for trash found on the street when the driver moved) – how about more city-operated garbage bins at every corner, not just on some corners.

Comment added August 9, 2023 1:51pm

Marc Shifflett

The new proposed rules for Source Separation of Residential Organic Waste are an important first step that I support but underscores the need for DSNY and the Mayors office to coordinate in order to better inform and educate residents, businesses, institutions, and NGO's on the need to pursue a policy of mandatory source separation of organic food waste.

I would recommend a few things to help the process move forward:

Work closely with the Mayor and OTI (NYC Open Data) to publish all relevant data regarding the program generally and mandatory organics specifically

Design in more granularity to the existing data, particularly when it comes to residential source separation, collection, and pre/post-processing.

Set up an advisory committee composed of all the stakeholders, abiding by the principles set forth in the CLCPA tasked to address waste equity along with incentivising, decontaminating, and reducing our waste streams across the many diverse communities as a tool to assist city-wide climate resilience planning and emergency resource allocation.

Establish a complaint category in NYC 311 for Smart bins (NYCCompost)

Comment added August 9, 2023 10:26pm

Kate Scholz

I am in full support of the City of New York advancing efforts in separating organic waste and diverting it from landfill. Effective waste diversion requires significant and widespread participation. The prescribed curbside program may not suffice for every resident / household. I recommend language be added that allows residents to opt out of mandatory participation in curbside collection of source separated organic waste if utilizing any of the following options:

- Backyard Composting
- Drop-off at Green Market, community garden, community composting site and/or smart Bin
- Technology innovations for in-home kitchens such as smart kitchen bins, kitchen bin dehydrators with closed loop processing, and similar interventions.

Comment added August 9, 2023 11:53pm