Testimony of
Jessica Tisch, Commissioner
New York City Department of Sanitation

Hearing before the New York City Council
Committee on Sanitation & Solid Waste Management
Monday, June 3rd, 2024, 10:00 A.M.

Oversight Hearing: Commercial Waste Zones

Good morning Chair Abreu and members of the Committee on Sanitation and Solid Waste Management. I am Jessica Tisch, Commissioner of the New York City Department of Sanitation, and I am joined today by Deputy Commissioner, Legal Affairs Robert Orlin and Assistant Commissioner, Commercial Waste Frank Marshall.

New York's Strongest collect and process 24 million pounds of waste each day. Every New Yorker knows about their vital and unceasing effort.

But that incredible daily undertaking accounts for only about 50% of the trash on our streets. The other half, 20 million pounds produced by our businesses, large and small, is not collected by DSNY, but rather by a byzantine network of private waste haulers.

This system is badly outdated, and its overall structure and day-to-day operations have not kept pace with best practices around waste management. This has a real impact on the hard-working people of the private sanitation industry, on New Yorkers who live in mixed-use neighborhoods or near waste transfer stations, and, of course, on our small businesses.

While DSNY does not collect this waste, Local Law 199 of 2019 clearly and specifically directs the Department to regulate its collection. This law, crafted after years of negotiations between the City Council and the carting industry, was designed to bring a perceived Wild West of commercial carting under control – to create a cavalry of sorts in the form of the DSNY Bureau of Commercial Waste.

The implementation of this massive reform required careful planning. As you all know, finalizing even a single City contract can take months or years; this law required no fewer than 18 contracts comprising 65 awards. It required the formation of committees, the development of new tech platforms, and extremely detailed contract negotiations, totaling in the tens of thousands of pages of documents. This work was done with a focus on the core goals of the law: increase safety, improve sustainability, and prevent massive price spikes that have hampered similar reform efforts around the country.

I am proud to report that this effort is well on track, with the first of the 20 non-exclusive Commercial Waste Zones described in the law slated to go online this fall in Corona, Elmhurst, Jackson Heights, and other neighborhoods in a Zone designated as "Queens Central." I will now provide updates on several key components of the implementation plan.

Safety

First, safety.

It is no secret that the commercial carting industry has long been plagued by safety issues, both for people working in the industry and for the public at large.

As part of this program, all commercial carters are required to make substantial upgrades to the safety equipment of their vehicles, including the installation of back-up cameras, auxiliary exterior lighting, and GPS monitoring systems like the ones used by municipal waste vehicles. Requiring carters to make this investment will make a real difference in safety.

All workers in this sector are also receiving a new mandated safety training – 40 hours either this year or when they begin their careers, plus an eight hour refresher every year thereafter. This must be completed citywide by the end of this month, and is well underway. There was no standardized safety training requirement prior to Local Law 199.

Any updates to this training that may be needed – as well as other suggestions on how to improve worker and public safety in this industry – will come from the new Safety Task Force created by the law. Local Law 199 outlines 11 members of this Task Force, including four individuals appointed by the City Council; the current Council appointees were named by then-Speaker Johnson. I expect the Task Force to meet this month, and would like to remind the Council of its opportunity to update these holdover appointees before then, as the Adams administration recently did. Our appointees represent a broad range of policy knowledge and professional experience.

All awardees were also required to submit written Health and Safety Plans, and operationalizing those plans is a mandatory contractual requirement to operate within a Commercial Waste Zone.

But all of these requirements would be moot without substantial new oversight authority, which DSNY receives under this law. The Department may terminate any contract if the awardee or any of its officers, directors, partners, five percent or greater shareholders, principals, or other employee or person substantially involved in its activities are *indicted or convicted* under any state or federal law for certain criminal offenses, including any offense possibly indicating a lack of business integrity.

Additionally, DSNY has the broad authority to require any awardee to enter into a monitorship agreement with an independent monitor at any time DSNY deems necessary. The Department has exercised this authority over two awardees, Cogent Waste Solutions and New York Recycling Solutions, which is a joint venture in which Cogent has a 50% stake, after learning that in December 2023, following a year-long audit, BIC filed a notice of violation against Cogent with a record high number of counts, in the thousands, regarding administrative issues.

DSNY selected the monitor, former Assistant US Attorney and former NYPD Deputy Commissioner of Internal Affairs Walter Mack of Doar Rieck Kaley & Mack, and Cogent and

NYRS will bear the full cost. The monitor has the authority to investigate the activities of Cogent and NYRS with respect to their compliance with applicable federal, state, and local laws, rules, regulations, including those related to safety, and his duties will begin four months prior to the earliest zone implementation date for Cogent or NYRS.

DSNY will take similar steps towards other awardees if warranted.

Sustainability

In keeping with the multiple goals of the law, we are improving safety while also increasing the environmental sustainability of this industry.

Ending the old routing structure in which a carter – and, therefore, a truck – could serve businesses miles apart in different boroughs in a single night will lead to a 50% reduction in vehicle miles traveled. That's 12 million fewer miles of diesel vehicles traversing our streets.

And there is a substantial sustainability angle for the businesses served by CWZ awardees. Making good on a promise from when this program was created, businesses will pay less for the collection of recyclables and compostable material than they do for trash – a Citywide average of 32% less for recycling and 18% less for compostable material. That means businesses will have a meaningful financial incentive to separate their waste properly.

On that topic, I would like to take the opportunity – as I have at two previous hearings – to again raise the issue of commercial organics separation. Local Law 146 of 2013 requires certain commercial establishments to separate their compostable material, but this law is now substantially out of step with the City's commitment to diversion of compostable waste. While the Commercial Waste Zone system will improve commercial diversion, we also urge the Council to consider an update that would allow DSNY to require source separation at all commercial establishments, in line with the progress made in residential diversion. <u>If helpful, I have a proposal for new legislation right here in my hand.</u>

And one last point on the issue of compostable material: the rules promulgated by DSNY on the implementation of Commercial Waste Zones specifically allow and account for microhaulers of organic waste. These sustainable small businesses are not a part of why the commercial carting industry needed this reform, and it is not this Department's intention to put them out of business. Rather, they will be given the freedom to continue to operate largely as they have, cycling around the City and putting compostable material to beneficial use.

Pricing

So, DSNY has taken steps to drastically improve safety and sustainability in this industry – but we were tasked with doing so without bringing about massive price increases that would harm our small businesses, as has occurred in other cities that have attempted similar reforms. This was extremely important to me. None of these reforms will work if the cost of waste service starts forcing small businesses to shutter.

I am proud to share that through very thoughtful and careful contracting, we have improved the quality of service provided while keeping costs down.

In 18 of the 20 Commercial Waste Zones, there is at least one awardee whose maximum pricing is *lower* than the current BIC rate cap – and in the two outliers, the amount above the cap is in the low single digits, as opposed to the exponential growth that some feared. And, just like with the BIC rate cap, these maximum prices are a ceiling, not a floor. Businesses are encouraged to negotiate with the carters in their zone for even lower pricing.

To help with those negotiations, we have developed a very intuitive and easy to use pricing calculator, where businesses can put in precisely how much and what type of collection they need and see the pricing for all the awardees in their zone. This tool is available at nyc.gov/cwz.

Outreach

Substantial on-the-ground outreach around these changes is about to begin in earnest. A mailer to businesses in the first zone will go to print this Wednesday, and starting on July 1st, DSNY will be blanketing the entire zone with door-to-door outreach. Both of these efforts are taking place on a timeline set forth in the law.

Canvassing will be overseen by DSNY staff but largely conducted via an MWBE vendor, Metropolitan Strategies and Solutions. We also plan to work closely with the NYPD Community Affairs Unit to expand the reach of this effort.

But quality of the outreach is every bit as important as quantity. Queens Central is perhaps the most linguistic and culturally diverse place on earth, and our outreach plans reflect that. In addition to the Local Law 30 languages, our outreach materials are being translated into languages spoken within the Zone, including Tibetan, Thai, Nepali, Yiddish, Italian, Hindi, Greek, and Albanian.

And lest you think that outreach is waiting until later in the summer, info sessions are already underway. The DSNY outreach team is leading discussions with the members of trade associations that represent large numbers of businesses – the NYC Hospitality Alliance, the Retail Council of New York State, the Hotel Association of New York City, and many others. This work will continue.

The goal is to reach absolutely every business in the zone multiple times, informing them of their new rights under this program, the tools available to them, and the requirement that they sign a new contract with a CWZ awardee between September 3rd, 2024 and January 2nd, 2025. As that period gets underway, the content of outreach will change, from explaining the program to ensuring that businesses understand what will happen if they do *not* register a new contract; namely, that a carter will be assigned to their business by DSNY.

Mr. Chair and members of this committee, you all know that New York City is in the midst of a Trash Revolution. You see the containers, you see the compost bins. This work to reform the commercial carting industry – and to do it right – is something many New Yorkers may never

actually *see* directly with your own eyes, but it is vitally important. It means cleaner air, cleaner streets, and a cleaner way of doing business for every commercial property in our City. While we have covered significant ground today, there is still more information about this program – for carters, businesses, and residents – available at nyc.gov/cwz.

Proposed Legislation

I will now turn to the bills on today's agenda.

Int-352, sponsored by Council Member Nurse, would require the Department to create a Commercial Waste Zones working group with up to 20 members, at least eight of whom will be representatives of the carting industry. Given that proposed make-up, I cannot support this bill in its current form. The inclusion of some but not all awardees or their designees in the working group would present legitimate concerns about favoritism and access in making policy decisions about the ongoing implementation of this program.

And, as discussed earlier in this testimony, the CWZ Safety Task Force is planning to meet this month; this will allow for discussion of all critical safety-related issues, making this additional working group unnecessary as proposed.

Int-696, also sponsored by Council Member Nurse, would require DSNY to establish at least one organic waste composting facility that can accept source-separated organic waste in each borough on a specific schedule between 2026 and 2027. While I strongly support the goal of waste equity, there are several issues with the specifics of this bill that make it infeasible.

Let's begin with the size. The bill as written says that each of the facilities – each of the five – must be able to process 360 million pounds of source-separated organic material per year. This is about three times the size of our massive Staten Island Compost Facility. At 33 acres, the Staten Island Compost Facility is slightly larger than Ellis Island. The requirements of this bill would require about three times as much space as that – so more than three Ellis Islands, 90 acres, in each borough.

It is approximately 240 times the size of the Earth Matter facility on Governor's Island or the Big Reuse facility in Long Island City. And again, that's a per-borough requirement, so we'd be talking about building over 1,000 facilities the size of a current community composting processing operation across the City.

Then there's the cost. Extrapolating from the previous plans to build a composting facility at DSNY's Greenpoint warehouse, hitting the requirements of this bill would have capital costs in the billions of dollars. That cost is not accounted for in the bill.

Then there's the timeline, which as mentioned is specifically spelled out in the bill. The timeline provided does not account for the fact that this kind of development would absolutely require an environmental impact study, ULURP, and State DEC permitting.

Finally, there's the fact that this bill specifies *composting* at these sites, rather than leaving the flexibility of other forms of beneficial use. We need to accept that the goal is getting this waste out of landfills; New York City already produces more compost than we can give away, and reducing our need for fracked gas by producing renewable energy from food waste is *also* a noble goal and a substantial win for the environment.

I would also like to remind the Council that DSNY does currently have an RFP actively underway to expand and diversify our processing of compostable material. We share the same goals around waste equity and beneficial use, but cannot support this bill due to the cost, timeline, and the constraints of the physical environment of the five boroughs.

The final bill on the agenda today, pre-considered T2024-2064, seeks to prevent an issue where mergers and acquisitions may reduce competition in a particular Commercial Waste Zone. I would welcome conversations with the sponsor, Chair Abreu, about the possibility of how such a situation might be best addressed. While I do not support it as written, I would like the opportunity for my team to work with your staff on a few drafting issues, so that if passed, the law will match the spirit and intent with which the bill was introduced.

We look forward to taking your questions on these bills and other topics related to commercial waste.

The City of New York
BUSINESS INTEGRITY COMMISSION
100 Church Street · 20th Floor
New York · New York 10007

Elizabeth Crotty
Commissioner and Chair

Testimony of Elizabeth Crotty, Commissioner and Chair of the New York City Business Integrity Commission, before the Committee on Sanitation and Solid Waste Management of the New York City Council on Commercial Waste Zones

June 3, 2024

Good morning, Chair Abreu and members of the City Council Committee on Sanitation and Solid Waste Management. My name is Liz Crotty, Commissioner and Chair of the New York City Business Integrity Commission, or BIC. With me is Nicole Mathias, Director of Policy. Thank you for the opportunity to testify today alongside Commissioner Tisch and my colleagues from the Department of Sanitation.

The Business Integrity Commission is the regulator of commercial waste, otherwise known as "trade waste," industry, and of the wholesale public food markets in NYC, BIC's focus is ensuring that these industries operate fairly, safely and without corruption, while protecting customers. This morning, I would like to provide the Committee with a brief overview of BIC's current work, our role in relation to Commercial Waste Zones, and our ongoing efforts related to safety as a member of the Vision Zero task force.

BIC reviews, licenses, and regulates about **1,900** companies that haul various types of trade waste. Altogether, these companies have about **6,800** commercial vehicles. The CWZ awardees represent a subset of BIC licensees that haul refuse and recyclables from commercial

establishments in NYC. CWZ does not impact other BIC licensees and registrants that haul construction and demolition debris and certain types of waste exempted from the CWZ program such as used cooking grease, medical waste, perform on-call junk removal services, or businesses that have a self-hauler registration with BIC to perform their own waste removal. As Commissioner and Chair of BIC, I chair the Board that consists of the commissioners of DSNY, DOI, SBS, DCWP and the NYPD. As Commissioner, I am in charge of the organization of BIC. However, when it comes to final decisions, as Chair, BIC cannot deny a license or registration application without a majority vote of the Commission's entire membership.

BIC and DSNY have a long-standing partnership, and BIC has been involved in planning for CWZ since the early stages, dating back to the prior Administration. The agencies serve two distinct but complimentary purposes, with DSNY running the CWZ program, and with BIC continuing to make character determinations for CWZ participants and to investigate, license and regulate non CWZ carters. Carters who participate in CWZ's will continue to have to apply for the renewal of their license every two years, and BIC will continue to conduct thorough background investigations with regard to those renewal applications.

Under CWZ, BIC will have co-enforcement authority with DSNY, building on the existing collaboration between our enforcement teams, who already conduct joint operations. Fostering these interagency partnerships is key to BIC's success and increases our capacity to regulate effectively. In addition to working with DSNY, BIC also regularly engages in joint enforcement operations with the New York State DOT and NYC DOT, the NYPD Transportation division, and the MTA Bridges and Tunnels division. This fiscal year to-date, nearly 50% of BIC violations issued to regulated trade waste companies have been related to vehicle and traffic safety, and safety will continue to be one of our top priorities.

As a Vision Zero Task Force member, BIC is involved in numerous interagency safety efforts and we also have a strong partnership with the NYPD Collision Investigation Squad or "CIS", who investigate all fatal crashes. The BIC Investigations Unit averages more than **250** truck and garage inspections every month. In FY2024 so far, we have removed more than **40** unsafe vehicles from the road and issued hundreds of administrative violations for safety infractions like failure to have a convex mirror for increased driver visibility, failure to produce required vehicle inspection reports, operation of a vehicle deemed to be unsafe, exhibiting a pattern of unsafe driving practices, and failure to install side guards. For example, per Local Law 108 of 2021 Side Guards which have to be attached to the many of the types of trucks we regulate. Thanks to a combination of enforcement and persistent outreach efforts, for example, BIC has achieved a **95%** compliance rate so far with the side guard requirement for the industry. BIC closely tracks safety and enforcement data and uses this information for targeted outreach and to prioritize safety operations in the most high-risk areas.

Since becoming the Commissioner and Chair of BIC, I have made sure that BIC's work has been guided by the core objectives of the Adams Administration: good government, safe streets, and responsiveness to the public. I look forward to continuing this important work and discussing our shared goals today.

I would be happy to answer any questions you may have.

OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO
Brooklyn Borough President

City Council Committee on Sanitation and Solid Waste Management
Oversight Hearing: Commercial Waste Zones & Intro 696
June 3, 2024

This testimony is written follow-up to comments that Borough President Reynoso gave in person at the June 3 hearing. Regarding Commercial Waste Zones, he hit three main points:

1) DSNY putting a 40% weight on pricing in the RFP evaluation undermined the spirit of the law, which was specifically and thoughtfully designed to address safety and environmental justice.
2) It is unacceptable that the RFP process allowed bad actors such as Cogent to receive zone awards. BIC testified that is it not in their mandate to consider worker safety; however this contradicts Local Law 198 of 2019, which added language requiring them to: "establish and enforce standards for service and for the regulation and conduct of businesses licensed or registered pursuant to this chapter, including but not limited to… environmental, safety and health standards, including but not limited to traffic safety requirements and environmental and safety requirements for vehicles used in the collection, removal, transportation or disposal of trade waste."
3) Starting with a pilot program rather than with full rollout of the plan is concerning. The legislation does not envision a pilot program, and doing so threatens to undermine the program if it is not executed well.

For his full comments, please refer to the hearing transcript.

Borough President Reynoso wishes to submit the following comments on Intro 696 for the record:

Intro 696 would require the Department of Sanitation to establish 180,000 wet tons of organic waste composting capacity in each borough. Now that the Zero Waste Act, which mandates curbside pickup of residential organic waste, is in the process of being implemented, it is in our city's best interest to develop our ability to process compost locally using traditional composting methods.

Commissioner Tisch testified that this bill would be too costly to implement and that the space required would be too large; however, it seemed she did not consider that DSNY could comply with the legislation by utilizing a mix of small, medium, and large sites in each borough, rather than having to identify five sites "the size of Ellis Island." The fact is, according to the latest Mayor's Management Report, DSNY collected 105,600 tons of organic material in 2023, and this

was before the full implementation of curbside pickup to all five boroughs. Additionally, Commissioner Tisch testified that she would like to see new legislation that would expand the mandate for source separation of organics to all commercial businesses. With full implementation of both, our organics processing needs will only expand in the coming years.

DSNY has acknowledged this by issuing a request for businesses to propose new organics processing capacity in the region. However, both anaerobic digestion and long-distance trucking present issues that traditional composting does not.

While any diversion from landfill is better than none, traditional, aerobic composting is the preferred method from an environmental impact perspective, according to the EPA. This is because anaerobic digestion creates two byproducts: biogas and biosolids. Biogas is primarily methane, a greenhouse gas that gets burned into the atmosphere if it is not captured for reuse. Biosolids are the solid byproduct of processed sludge. According to DEP, New York City produces about 1,400 tons, or 600 truckloads, of biosolids per day at its wastewater treatment plants, and much of it ends up in landfills. Therefore, the current practice of organic waste processing would not satisfy the City's goal of sending zero recyclable/reusable waste to landfills by 2030.

Borough President Reynoso supported the pilot program at the Newtown Creek Wastewater Treatment Plant that sought to capture methane and redistribute it into the city's heating system; however, he has been disappointed by the years of delays in implementation and failure of the system to function reliably. Additionally, the pilot program is adding more waste trucks to the streets of North Brooklyn, an environmental justice community that still processes more trash than any other area of the city. The Borough President fought hard to pass Waste Equity legislation to reduce the number of waste trucks in North Brooklyn (as well as the South Bronx and Southeast Queens) and this program undermines that effort. The Borough President is also very conscious that developing more processing capacity outside the city potentially means higher costs for the City, more long-haul trucks on the roads, and increased emissions in other environmental justice communities. We must tackle our capacity challenge with a priority for environmental justice and equity, and with robust community engagement that involves New Yorkers in the siting process.

Intro 696 challenges us to meet the moment with a solution that is fiscally and environmentally responsible. Processing organics locally, utilizing a mix of large, medium, and small-scale facilities managed by the City, non-profits, and other small business would create green jobs for New Yorkers and ensure we have a sufficient supply of local compost for our parks, rain gardens, community gardens, and street trees. Our office is supporting the Solid Waste Advisory Boards in their efforts to create a site feasibility analysis, and we look forward to sharing the results with DSNY and working together to implement this bill.

REBNY Testimony | June 3, 2024

The Real Estate Board of New York to
The City Council Committee on Sanitation and Solid Waste Management on Commercial Waste Zones and Composting Facilities

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association. Founded in 1896, REBNY represents commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople and other organizations and individuals active in New York City real estate. We appreciate the opportunity to testify on Commercial Waste Zones and Composting Facilities.

Oversight: Commercial Waste Zones (CWZs)

REBNY has long been engaged with the City Council and Mayoral Administration in the development of the CWZ program. It is vitally important to our members that the transition to a new way of handling commercial waste is seamless and that property owners receive a high level of service. Further, the success of this rollout is critical if the City is to accomplish its goal of being a clean welcoming place for people to live, work, and visit.

As the change to CWZs is so significant, we applaud the Department of Sanitation's (DSNY) decision to roll out the program in a controlled manner. Beginning in a single district that contains many different urban landscapes is commendable as it will give time to work through any unforeseen situations before being rolled out more widely.

Bill: Intro 352-2024

Subject: This legislation would establish a "commercial waste zone working group" made up of agency staff, a Council Member, waste carters, and City Council Speaker appointees, which would include waste industry union representatives, environmental experts, environmental justice experts, and a micro-hauling representative.

Sponsors: Sandy Nurse, Lincoln Restler, Crystal Hudson, Alexa Avilés

REBNY appreciates the intent of this legislation, and we agree that additional oversight from stakeholders will be important for DSNY to receive critical feedback on how the CWZ program is working. However, the make-up of the working group leaves out major stakeholders who will be the most impacted by the new approach to handling commercial waste. Specifically, building owners/managers and business representatives must have significant representation on the working group. As the primary customers of the commercial waste industry, these actors will play a major role in the success or failure of the CWZ program. Building owners/managers and business representatives need to be as well represented on this working group as any other group of stakeholders.

Bill: Intro 696-2024

Subject: This bill would require DSNY to establish at least one major composting facility in each Borough of the City and lays out a schedule for identifying existing facilities or establishing new ones for each Borough. These City owned and operated facilities would receive uncontaminated biodegradable waste that can be converted into compost. The bill sets forth a number of actions the City needs to take while siting these facilities.

Sponsors: Sandy Nurse, James F. Gennaro, Shahana K. Hanif, Keith Powers, Carlina Rivera, Lynn C. Schulman, Christopher Marte, Tiffany Cabán, Jennifer Gutiérrez, Shaun Abreu, Farah N. Louis, Alexa Avilés, Selvena N. Brooks-Powers, Yusef Salaam, Pierina Ana Sanchez, Nantasha M. Williams, Chris Banks, Lincoln Restler

REBNY appreciates the intent of this legislation. Finding better and more environmentally-friendly ways of handling food and yard waste could be a very important way of reducing how much waste goes to landfills and incinerators, and it can in theory produce a very useful product, compost, a fertilizer that can improve soil and plant health. As the City expands its organics collection requirements, building owners want confidence that once the organic waste leaves their building it does not wind up in a landfill.

Currently, one barrier to doing so is a lack of capacity for composting in an urban environment such as New York City and the surrounding area. However, accomplishing the goals of this bill will be an ambitious and costly task, particularly given the historic challenges of siting waste facilities in the city and the capital expense of building new state-of-the-art facilities. As such, it is prudent to provide flexibility for City agencies so that they can achieve the goals in a reasonable rather than rushed manner.

Finding capacity to manage the significant amounts of organic waste generated in the city is an important policy issue and REBNY looks forward to working with the City Council to try to find solutions to this problem.

Bill: T2024-2064

Subject: This bill would prevent mergers of commercial waste haulers where one company would have contracts to handle commercial waste in more than 15 CWZs.

Sponsors: Shaun Abreu

Throughout the process that led to the establishment of the CWZ program, REBNY insisted that the best way to ensure the success of any new system was to maintain competition in the carting industry by allowing owners to choose from several different haulers. However, rather than prevent carting companies from merging, we believe a more prudent approach would be to require DSNY to add an additional carter to any zone should such a merger occur or require that the merged entity subcontract its operations.

CONTACT:

Ryan Monell

Vice President of Government Affairs
Real Estate Board of New York
rmonell@rebny.com

Daniel Avery

Director of Policy
Real Estate Board of New York
davery@rebny.com

NYC | HOSPITALITY ALLIANCE

June 3, 2024

Comments of the NYC Hospitality Alliance before the NYC Council Committee on Sanitation and Solid Waste Management on Int. No. 352-2024, in relation to creating a commercial waste zones working group

The NYC Hospitality Alliance ("The Alliance") is a not-for-profit organization representing thousands of restaurants and nightlife establishments across the five boroughs that will be affected by the Commercial Waste Zones program, so we submit this testimony on Int. No. 352-2024, *in relation to creating a commercial waste zones working group.*

The Alliance was appointed to and participated in the city's multi-year Commercial Waste Zones Advisory Board prior to its enactment. More recently, we've had discussions with the Department of Sanitation about the program's implementation and will co-host information sessions for restaurants, bars, nightclubs, and other food service establishments so they can learn what to expect because they will be among the most affected small businesses by the new commercial waste zone program.

Thus, after reviewing Int. No. 325-2024 we became very concerned that while the proposed legislation creates a large working group of many stakeholder representatives, it does not provide for and require even one member to be from the small business community, which is a critical stakeholder in the commercial waste zone program. Small business and food service sector participation on the working group is critical.

We support the creation of this working group and urge the City Council to add multiple representatives from our city's small business community to it. And we respectfully request that the NYC Hospitality Alliance be appointed to one of those seats because of our years of engagement on this issue, our vast perspective, and the fact that the industry we represent across the five boroughs will be among the most significantly affected by the commercial waste zones program.

If you have questions or comments, please contact our executive director Andrew Rigie at arigie@thenycalliance.org.

Thank you for your consideration.

Respectfully submitted,

NYC Hospitality Alliance

New York City Hospitality Alliance
65 West 55th Street, Suite 203A | New York, NY, 10019
212-582-2506 | info@thenycalliance.org | www.thenycalliance.org

New York City Environmental Justice Alliance
462 36th St, 3F, Brooklyn, NY 11232 | www.NYC-EJA.org

On the ground – and at the table

New York City Environmental Justice Alliance Oversight Hearing Testimony on NYC's Climate Resiliency Efforts To NYC Council Committee on Fire and Emergency Management, Jointly with the Committee on Oversight and Investigations

June 3, 2024

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns designed to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income communities of color to thrive. NYC-EJA is led by the community-based organizations that it serves.

NYC-EJA is also a founding member of Transform Don't Trash (TDT), a longstanding coalition of environmental justice, labor, and environmental organizations working to transform New York City's sprawling solid waste management systems to be far more equitable, efficient, sustainable, and safe for workers and the communities most affected by solid waste infrastructure. Since 2013, the Transform Don't Trash Coalition has worked together toward reformation of the solid waste industry, in a campaign that culminated in the October 2019 City Council passage of the Commercial Waste Zones Law (Local Law 199).

The most ambitious overhaul of NYC's commercial waste system in a generation, LL199 intended to create a safe, efficient, and green commercial waste collection system centered around worker and labor protections, environmental justice, and emissions reductions. In fact, DSNY found that implementing CWZ would decrease truck traffic associated with commercial waste collection by 50% citywide, as measured in vehicle miles traveled, reducing both the number of trips and the lengths of collection routes for commercial waste, resulting in corresponding reductions in air pollutant emissions and noise, as well as improvements in traffic safety.

Currently, in New York City, over 24,000 tons of garbage are produced daily, generating massive transportation and pollution impacts to and from privately owned and operated waste transfer stations along the waterfront. While the total amount of waste handled at private transfer stations in NYC has decreased approximately 17% since the implementation of the "Waste Equity Law" in 2018 (Local Law 152), newly released data from the Department of Sanitation shows that the system remains grossly unfair and unequal. Just four community districts still handle 75% of all NYC's private waste. The vast majority of this garbage generated by

businesses and buildings citywide passes through communities with some of the highest rates of asthma such as North Brooklyn, the South Bronx, and Southeast Queens.

Additionally, private waste transfer stations are more likely to be sited in communities with a higher percentage of people of color living below the poverty line and bring with them truck traffic, noise, and health-harming emissions according to NYC Comptroller's recently released audit report on the City's Fair Share compliance. While there are 24 waste facilities crammed into these overburdened community districts, a total of 45 other districts have no waste facilities at all. The Waste Equity and Commercial Waste Zone Laws were written to address these environmental and quality of life disparities and issues, yet communities of color are still forced to shoulder the burden of waste transfer sites and waste collection services, such as truck traffic and pollution.

TDT is increasingly concerned about how DSNY is implementing the Commercial Waste Zone Law and the lack of transparency, specifically on how DSNY is evaluating and selecting the contractors. LL199 laid out 14 distinct clear criteria to be used in the evaluation process, including requiring applicants to submit plans for recycling and composting and the use of clean-burning and zero-emission vehicles; plans for reduction of greenhouse gas emissions; and history of compliance with health, safety and worker protections. However, it is not clear how and if the criteria was used and how plans were evaluated and awardees and plans selected. We also have questions about the reasons and motivations for implementing it first as a pilot program and what that means for the implementation and timeline for the rest of the zones. Some of the contractors who were awarded contracts have BIC violations or had troubling histories, which are hard to keep track of when companies keep merging and/or getting acquired.

Mayor Adams and the City Council should be taking immediate steps to relieve EJ communities of excessive truck traffic, pollution, and odors, while reducing the miles that dangerous and polluting waste trucks drive on all New York City Streets. We call on the administration to:

- First, DSNY needs to implement commercial waste zones (CWZ) as required by Local Law 199 of 2019. When implementing, DSNY needs to follow the legislative intent of Local Law 199 and prioritize reductions in truck miles, recycling and waste reduction practices, labor and worker rights, and clean truck fleets alongside price considerations. We also support Int 0352-2024, which would establish a working group and include EJ representatives.
- Second, expand the City's operations and capacity to begin accepting commercial waste at publicly-owned Marine Transfer Stations, thereby reducing the number of dirty, dangerous diesel garbage trucks driving on local streets. Environmental justice

communities have long advocated for this measure, which is required by the Solid Waste Management Plan passed by the City almost 20 years ago but has still not been implemented by DSNY.

- Third, simultaneously, the City needs to get us as close to zero waste as possible using various strategies so there is less trash being handled and shipped to landfills in EJ communities in other states. One way to do this is to invest in extensive local organic composting infrastructure to process yard waste and food scraps that must be separated and recycled under Local Law 85 of 2023. As such, NYC-EJA supports Int 0696-2024 – CM Nurse's bill that would establish composting facilities in each borough and not rely on anaerobic digestion, which is how most of our compost is getting "composted", producing biogas and methane flares.

The fight for waste equity, cleaner air, healthier and safer communities continues as we work to ensure not only that the City handles its trash and siting of waste transfer stations more equitably, but also reduces its greenhouse and co-pollutant emissions by transitioning to greener, alternative modes of solid waste management and investing in zero waste strategies such as organic composting.

- DSNY CWZ hearing points to bring up
    - CWZ Implementation (evaluation & selection process)
    - Marine transfer stations as a tool to reduce emissions from waste transpo (progress?)
    - Zero Waste (e.g., organic composting)

Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
City Council Committee on Sanitation and Solid Waste Management
Oversight Hearing on Commercial Waste Zones
June 3, 2024

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). Thank you, Chair Abreu, as well as members of the Committee on Sanitation for the opportunity to comment.

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

NYLCV welcomed DSNY's announcement in January of the Queens Central Commercial Waste Zone, the City's first zone to be implemented as part of this law. While it has taken the city far too long to get to this point for such a common sense policy, if implemented in a comprehensive, timely, and transparent manner, the CWZ law will bring New York City closer to its zero waste goals and improve the safety of workers, pedestrians, and cyclists. It will also cut down on traffic congestion, improve air quality, and curb the city's tailpipe pollution and carbon emissions, which is especially important in low-income communities and communities of color.

Although the first zone is slated to rollout in September of this year with the final implementation date for this zone in January 2025, we are still waiting for the law's full implementation (*nineteen* other zones). While we understand the importance of starting off on the right foot and learning from other cities' attempts at overhauling its waste system, it is imperative that the City carries out this law in a timely and transparent manner. NYLCV hopes more information will be released about the plans submitted by each designated hauler in the first zone, including waste diversion plans and vehicle miles traveled (VMT) reduction plans.

Moreover, with the FY25 budget negotiations underway, we would be remiss if we did not mention the importance of funding for CWZ staffing, outreach, and education, especially as DSNY ramps up the rollout of more CWZs and implements the citywide residential organics program. We appreciate that DSNY has $3.2 million budgeted for CWZ outreach and education, but we hope more outreach funding will be allocated in the years to come as DSNY rolls out more CWZs to prepare businesses, especially education materials in multiple languages. As

CWZs and curbside organics are rolled out, we hope these two programs will be coordinated so that New Yorkers can start composting comprehensively, whether in residences or businesses. We also urge DSNY to continue working towards transitioning to zero-emission vehicles for DSNY and commercial sanitation trucks. Additionally, the City must continue working with DCAS, utility companies, and industry professionals to ensure adequate charging infrastructure is installed and available for sanitation trucks and give extra consideration for CWZ carters with the most aggressive plans to do so. Requiring cleaner fleets as part of the City's move to CWZs is also the best way to bring measurable air quality improvements to neighborhoods that house a disproportionately high number of haulers and waste processing facilities. It is not good enough to require citywide emissions reductions. We should also strive for more localized benefits.

Legislation

NYLCV supports Intro 352, sponsored by Council Member Nurse, which would establish a CWZ working group to study the implementation of the CWZ reform plan established by Local Law 199 of 2019 and make policy recommendations as needed. This bill is a positive step in ensuring the CWZ law is effectively and transparently implemented by establishing a working group consisting of representatives from DSNY, City Council, commercial waste carters, environmental justice communities, and more. We also support Intro 696, sponsored by Council Member Nurse. This bill would require DSNY to establish one or more organic waste composting facilities in each borough. Each borough's facility or facilities would be required to have the cumulative capacity to process no fewer than 180,000 wet tons of organic waste annually. We appreciate that this bill requires community engagement and provides flexibility in establishing these facilities by focusing on the cumulative capacity, so that if needed, smaller, neighborhood-sized facilities could potentially be established. Lastly, we are still reviewing pre-considered Intro T2024-2064, sponsored by Council Member Abreu, in relation to mergers, acquisitions and combinations of awardees of agreements to provide commercial waste collection services, and look forward to working with the Council on this bill.

Conclusion

NYLCV looks forward to working with the Council, Administration, and fellow advocates on these bills and for the timely and transparent implementation of the CWZ law so we can finally get closer to our zero waste goals and improve our commercial waste system.

Thank you for the opportunity to testify.

National Waste & Recycling Association℠
Collect. Recycle. Innovate.
Northeast Region

NWRA Testimony Regarding Int. 352-2024
June 3, 2024

My name is Lew Dubuque, and I am the Vice President for the Northeast of the National Waste & Recycling Association (NWRA). NWRA represents the private sector waste and recycling services industry. Association members conduct business in New York City and all 50 states and include companies that manage waste collection, recycling and medical waste, equipment manufacturers and distributors, and a variety of other service providers. NWRA represents the hardworking men and women of the industry who collect and manage the waste, recyclables and organics produced by the more than 100,000 commercial entities in this great city.

I would like to thank Council Member Nurse, Chair Abreu, and the rest of the Sanitation and Solid Waste Management Committee for bringing forward legislation to create a Commercial Waste Zone working group.

During the four years it took to get to this point, where haulers are currently waiting to serve the many businesses in New York City under this new program, NWRA feels the entire process has lost the collaboration that existed during the Commercial Waste Zone's conceptual stage.

We want to reiterate that nowhere in the US has such a zoning program been adopted or implemented to this scale or structure. We fully understand that this is an unprecedented and complex process. NWRA and our members share New York City's goals of promoting a modern and effective industry that is not just focused on providing its core services, but is re-focused on sustainability, zero waste, emissions reductions, and fair labor practices. But we also believe that implementation of such a significant and potentially confusing transition to a commercial franchise system requires a measured, thoughtful, and collaborative implementation process.

That is why we were very pleased when Council Member Nurse introduced legislation to create a commercial waste zone working group. As we just stated, the City's transition from open market to the commercial waste zones will be an historic

National Waste & Recycling Association℠
Collect. Recycle. Innovate.
Northeast Region

and complicated undertaking that will take many years to fully implement. The sooner we can begin the process of putting a working group together, the better.

The success of this entire process will be based on not only selecting the right awardees, but also the partnership between all stakeholders and DSNY. That cooperation, if properly aligned, can have a significant impact on the success of the entire process.

So we are here today to encourage the City Council to support this legislative proposal and to have DSNY begin to engage with the CWZ working group in a deliberate, collaborative process and ensure a successful implementation of the Commercial Waste Zone.

Based on the foregoing, it is respectfully requested that this legislation receive favorable consideration.

50 Broadway, 29th Floor
New York, NY 10004
www.alignny.org

Testimony to Committee on Sanitation and Solid Waste Management Oversight Hearing on Commercial Waste Zones

June 3, 2024

Council Member Shaun Abreu, Chair
New York City Committee on Sanitation and Waste Management

I am Theodore Moore, Executive Director at ALIGN: The Alliance for a Greater New York. We bring together labor, climate, and community for a more just and sustainable New York, and I am writing as one of the lead organizations of the Transform Don't Trash (TDT) Coalition. The Transform Don't Trash NYC coalition is dedicated to transforming New York City's commercial trash industry to reduce waste and pollution, foster clean and healthy communities for all New Yorkers, and create better working conditions and good jobs for our state's workers. Thank you to Sanitation committee chair Council Member Shaun Abreu and members of the committee for the opportunity to submit testimony today.

On May 16th 2024, a private sanitation truck driver from Liberty Ashes fatally struck a pedestrian on Cornelia street close to Washington Square Park. In January 2024, a driver for Cogent made an illegal u-turn colliding with the driver of a Mercedes killing him. Liberty Ashes and Cogent are two of the companies that have been awarded contracts to cover zones in the Commercial waste zone system to be implemented under Local Law 199 (LL199) of 2019.

In an industry plagued with unsafe driving, these are just two examples of recent avoidable incidents that have occurred as the implementation of our commercial waste zone system continues to be delayed. Not only was the commercial waste zone program created to reduce vehicle miles traveled of trucks through overburdened communities and by extension reduce emissions that are literally choking these communities but, it is to create stricter standards and practices to improve worker protections and the safety of sanitation workers and community members. Under LL 199, Department of Sanitation (DSNY) can enforce more rigorous safety standards for awarded carters, such as workforce training requirements including workplace safety, vehicle operations, and public safety hazards associated with the collection and transfer of waste.

We were delighted to see that the first waste zone is set to come into effect this fall, but it is also concerning that 19 zones still remain to be implemented. It is even more concerning that Liberty Ash and Cogent are among the list of DSNY awardees for

Executive Director
Community Voices Heard

Jose Lopez
Co-Executive Director, Make the Road NY

commercial waste zone operations. It is our sincerest hope that as required by LL199, all factors listed in the law have been considered and properly weighted in the choosing of the current list of awardees. It would be an absolute shame that after years of tireless work to develop, advocate and pass this legislation that five years later, the waste zone system creates the same or even worse challenges for workers and the community as the current system.

New York City produces about 24,000 tons of waste each day, thus the implementation of the waste zones also means developing sufficient capacity to support waste collection at waste transfer stations. We implore DSNY to allow waste haulers to utilize the Department's Marine and Rail Transfer Stations, which can help further reduce mileage and emitted emissions. To this end, we remain supportive of Council member Nurse's Intro 55 bill, which requires the Department of Sanitation to accept commercial solid waste at city-owned or operated marine transfer (MTS) stations and city-owned or operated rail transfer stations. Marine transfer stations are operated by the New York City Department of Sanitation (DSNY) so there are more stringent requirements for compliance with regulations and labor standards so there are less concerns than with privately owned facilities.

It is imperative that the Council supports the full and timely implementation of the remaining 19 zones and supports DSNY in the commercial waste zone implementation and oversight awarded carters. We appreciate that Councilmember Nurse has introduced Intro 352 to create a working group that would be able to evaluate and support the implementation process for waste zones.

Thank you for the opportunity to raise our coalition's concerns regarding continued waste inequity in our city. We look forward to working with the City Council and DSNY to implement the remaining 19 zones and to ensure the highest possible environmental, safety, and customer protection standards across the new waste system.

Sincerely,

Theodore Moore

Committee on Sanitation

Support for intro 696, restoring funding for community composting, and Big Reuse Queensbridge site

To: The Honorable City Councilmember Shaun Abreu, Chair and CM Sandy Nurse
From: Justin Green, Big Reuse
Date: 6/3/24

Dear Chair Abreu and CM Nurse,

Thank you to Councilmember Abreu for your support for community composting!

I am Justin Green - Executive Director of Big Reuse. We are grateful to the City Council for the strong response to the Mayor's budget demanding restoration of community composting funding. Additionally we ask City Council to act to legislate that Parks Department require community composting to remain at our Queensbridge composting site.

I am here to testify in support of Intro 696 and composting as much organic waste as feasible in NYC through community composting and city run composting facilities. The City must make investments in waste infrastructure that have the best long term climate impacts. Investing in composting infrastructure has a better climate impact than digesting organic waste with sewage to make methane.

Composting at scale in the city is possible. Some capacity could be community composting but a majority would be operated by DSNY at larger scales. There are fossil fuel infrastructure brownfields in Northern Queens and Norther Brooklyn that would be great locations to repurpose and replace natural gas with composting infrastructure and large scale solar. See maps below. Environmental organization held rally June 2 at National Grid sites in Greenpoint demanding transition of the sites to climate positive activities.

Canada has multiple in city processing facilities for composting. AIM group has designed and built facilities in Hamilton, Guelph, Halifax and Calgary with fully enclosed in-vessel aerated static pile composting, including in-vessel maturation that compost from 65,000 US tons to 160,000 US tons. An indoor compost facility in Calgary processes 160,000 US tons in 521,000 sqft . Similar facilities could be built in NYC with two stories on 250,000 sqft footprint that could each process over 160,000 US tons. Another example facility in Hamilton, Canada is 115,000 SF facility that processes 66,000 US tons.

There is tremendous demand for compost in NYC. Composting distribution from Fresh Kills is oversubscribed - sign up sheets for distribution are immediately filled in 24 hours. The city is raising parks along the shorelines for resiliency and importing topsoil when it could be using compost produced in the city. As the city tries to improve street tree canopy to reduce heat island effect there is need for improved soil thoughout the city and ongoing compost application for all street tree beds. All lawns in parks in the city could use regular application of compost to help them cope with heavy city usage.

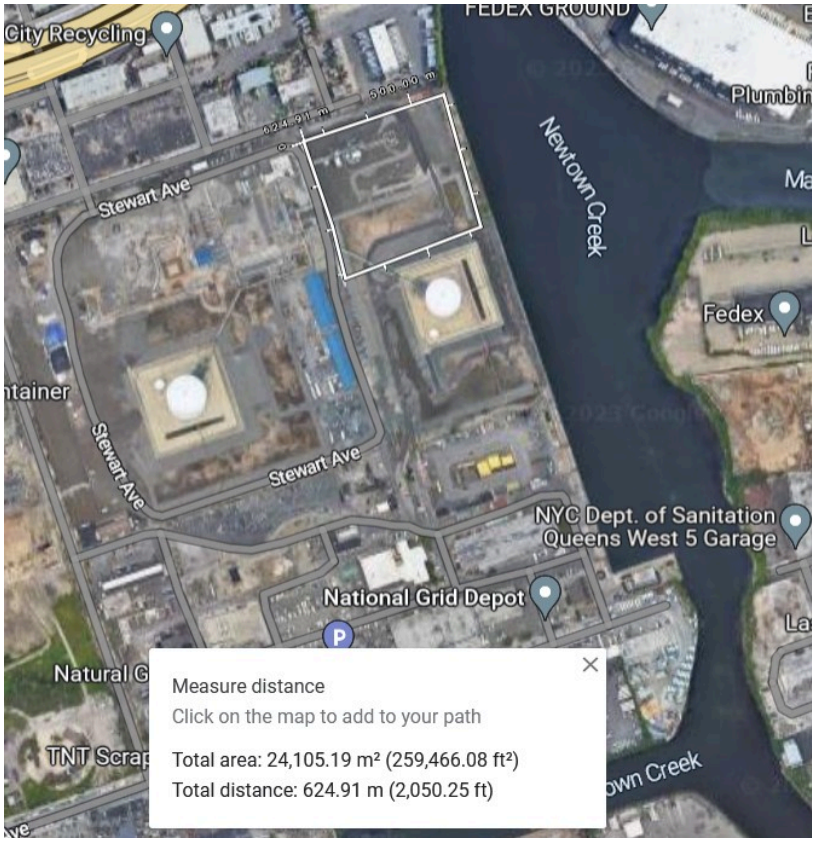
The City has currently prioritized digesting organic waste from most of the city with sewage to create methane/natural gas. Investing in natural gas/methane infrastructure is the wrong decision. We should be decommissioning and transitioning from natural gas/methane infrastructure - not investing additional natural gas/methane infrastructure that will delay transition to true decarbonization.

Calculations on the benefit of investing in "biogas/renewable natural gas - RNG" vs fracked methane ignore that solar and wind and heat pumps and electric stove can and should be replacing methane entirely in our city heating systems. Investing in RNG/methane siphon investment away from solar and wind and building decarbonization that actually reduce emissions. Methane leakage as low as 0.2 percent puts methane's climate impact on par with coal. It is easy to imagine .02 percent eakage throughout citywide natural gas/methane distribution system.

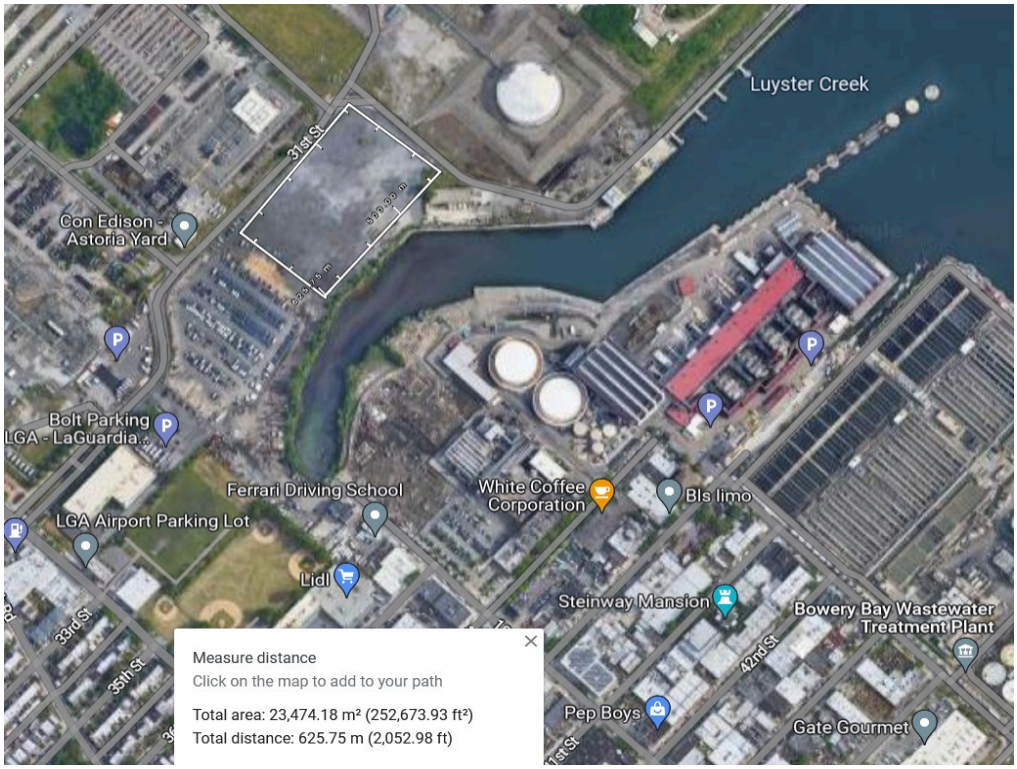
Additionally assumptions of RNG/methane climate friendliness are dependent on carbon released from its combustion being absorbed and sequestered by the agriculture process that produced the organic waste so it can then be burned again. The issue with this calculation is we need to reduce the amount of carbon released from all sources and increasing sequestration of carbon currently in the atmosphere - not burning and releasing more carbon dioxide under the guise of "renewable combustion energy".

The bio digesters provide a greenwashing to natural gas/methane infrastructure and utilities. National Grid is planning to build more interconnections despite not getting Newtown Creek right.

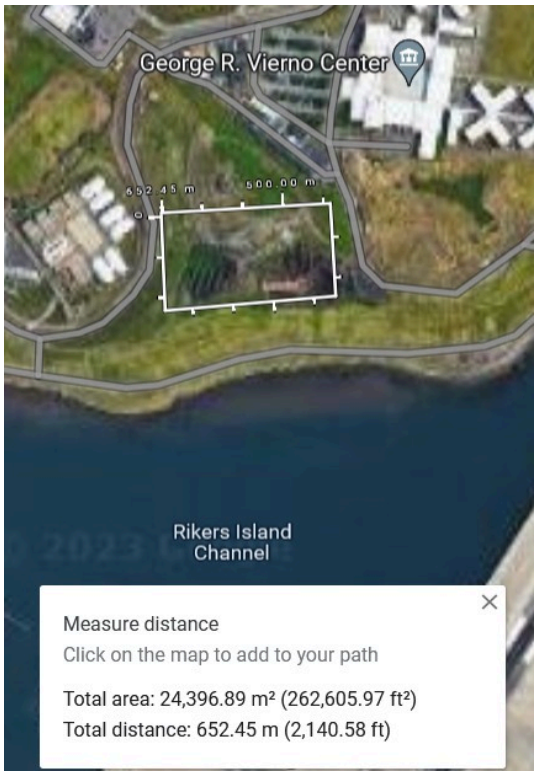
Possible sites for - 250,000 sqft 2 story compost facility footprints might look like in each Brooklyn, Queens, Bronx, Rikers - reusing natural gas storage and brownfields. Many of these sites have water access for barging of compost and organic waste.



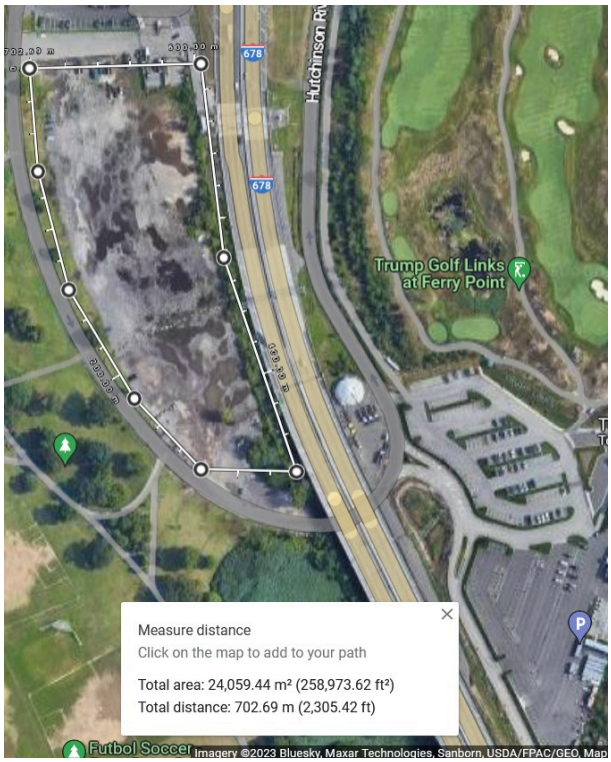
Brooklyn - [National Grid brownfields and LNG storage tanks] - 250,000 sqft



Queens - [DSNY and Con Edison brownfields and NG storage] - 250,000 sqft



[Rikers](#) - 250,000 sqft



Bronx - [Parking lot near Trump golf course](#) and Whitestone

Manhattan would be a challenge to locate enough space for large scale composting. [Barges](#) or [piers](#) could be built for this purpose.

1) AD is provides false solution of biogas/RNG and greenwashing. Food and Water Watch recent paper documents oil companies profiting off IRA and investing heavily in AD and RNG in agriculture. Chevron and Shell use farms to greewash their continued methane production much as National Grid uses AD.

We should be decommissioning methane infrastructure, not building more.

2) Codigestion is NOT a cost effective way to heat homes - National Grid built out system for $70million to provide gas to 5000 homes using sewage and approx 80,000 tons of food waste annually.

> From Brooklyn Paper - DEP uses about 40% of that biogas to power the treatment plant, and, with the new gas-to-grid project, the remaining 60% is given to National Grid for free to be refined and added to the company's supply. the city's contract with the utility granted **gas for free for 20 years** starting once the project came online — the company is still seeking to recoup the $50 million they spent on the facility.

$50M divided by 5,000 homes is $10,000. Bloc Power estimates Heat Pump installation between $8,000 and $10,000. Federal incentives could cover 35%. For $50M, National Grid could have installed heat pumps in 5,000 to 8,000 homes.

3) Land applying sewage sludge is not a good idea in the US where chemical safety is not tightly controlled. Our sewage treatment process concentrates all the pollutants and chemicals into the resulting sludge - including toxins, heavy metals, dioxins, PFAS, microplastics, and pharmaceuticals. Sometimes plants treat industrial waste water and leachate from landfills. We should not spread resulting sludge with concentrated chemicals on land.

EPA has found more than 700 pollutants in biosolids (in at least one instance) since EPA began tracking in 1993 when 40 CFR Part 503 was promulgated. The EPA requires biosolids be tested for phosphorus, pathogens, and nine heavy metals before land application in its Rule 503, but does not set any limits for any PFAS compounds. In a 2018 report "EPA Unable to Assess the Impact of Hundreds of Unregulated Pollutants in Land-Applied Biosolids on Human Health and the Environment" , the EPA's Inspector General - raised concerns about gaps in its oversight of biosolids materials . It cautioned that the agency should consider the cumulative hazards posed by other persistent contaminants in biosolids and revise its public messages about biosolids safety. Sierra Club found PFAS in 9 different home fertilizers made from sewage.

> From Sierra Club - There have been several high-profile cases where land application of biosolids spread harmful amounts of PFAS into the environment. In Alabama, 3M and Daikin released large amounts of PFAS wastes into the local wastewater system. The land application of highly contaminated biosolids over more than a decade contaminated 5,000 acres of farmland, community water supplies. In Maine, two dairy producers discovered that biosolids applications permanently contaminated their land, rendered their products unsellable, and impacted dozens of nearby wells.

From Guardian - Maine last year became the first state to ban the practice of land application. Similarly, Michigan officials and environmental groups have uncovered PFAS contamination on dozens of farms. The state enacted a plan to identify farms at risk for the highest levels of contamination, prohibited some wastewater treatment plants from selling sludge, and forced polluters to stop discharging PFAS into sewers

4) Only 50% of digestate sludge is land applied - not the best use of food waste that could be composted. 14 NYC Water treatment plants each produce sludge after treatment (aka treated solids). Sewage sludge is the semisolid or liquid residue generated during the treatment of domestic sewage. When the sludge goes through additional processing and treatment to meet EPA standards for land application, they are referred to as biosolids. DEP struggles to maintain their extensive CSO water treatment infrastructure as is. Most DEP plants can not currently produce Class A or B biosolid. The difference between Class A or B biosolids and regular sewage solids are the amount of pathogens like e coli - not other pollutants. DEP has contracts with different firms for receipt and handling of treated solids. Some are composting firms, some do land application, some send to landfills. For biosolids, DEP is sending a portion to composting in Rockland County, and a portion to land application/mine reclamation. This portion not landfilled is in the 40-50% range for all solids production. A portion of untreated solids are sent before dewatering to the Passaic Valley Sewerage Commission (PVSC) which has its own treatment processes, and its own contracts for disposal treated material. (PVSC also trying to open methane power plants in Ironbound community in Newark.) For treated solids that don't meet the biosolids designation, DEP and PVSC send material to landfills - often categorized as beneficial use Alternative Daily Cover - covering the landfill instead of going into landfill.

5) Much of the beneficial climate impact calculated from AD comes from beneficial use of the sludge in land application.

During a worsening climate crisis - community composting and composting should be expanded. The need for programs that empower the community to respond to climate change should be obvious after an unprecedented year of climate impacts in NYC - wildfire smoke, record rain, and high tides flooding some NYC neighborhoods.

The Mayor has also talked about resiliency, green jobs, and budget climate accounting goals. Parks is currently evicting our Queensbridge composting site we built out over the last decade. If the city and Parks want to combat climate change - community composting does that. We make compost from Parks and leave and yard waste which makes green infrastructure more resilient and increases absorption of water.

We ask the City Council to pass intro 699, push to restore community composting funding and capital funding to complete promised community composting sites and legislate our Queensbridge composting site.

Contact: Clare Miflin
clare@centerforzerowastedesign.org
917 254 7453

Testimony for June 3rd 2024 Hearing Committee on Sanitation and Solid Waste Management
Oversight Commercial Waste Zones, Int 0352 and Int 0696

I am Clare Miflin, Executive Director of the Center for Zero Waste Design, a member of the Save our Compost Coalition. I want to start by thanking CM Abreu and the council for their support for the reinstatement of funding for community composting.

I am firmly in support of Bill 0696 to establish community composting facilities in each borough.

Community composting creates high quality compost to make the city greener and more resilient. As the city transitions away from fossil fuel infrastructure towards electrification, it makes little sense to turn our food scraps into biogas, and a solid primarily sent to landfill. 20% is composted, most in the Staten Island Compost Facility, where first there is equipment to pull out all the plastic bags, but of course this is not fully possible and plastics remain in the resulting compost. The compost from NYC Compost Project is much higher quality, as there are no plastics to try and screen out, and has higher nitrogen content as more food scraps are incorporated. This high quality compost is ideal for parks, community and school gardens, rain gardens and street trees - increasing stormwater infiltration rates and the health of soils, plants and trees. While the Commissioner just stated that NYC cannot even give away its compost – that is because we as a city are not maintaining green infrastructure and parklands – we have unhealthy degraded soils. Also, I believe it is DSNY's compost from Staten Island that is not able to be all given away. I do believe that the community composters have no problem giving away their high quality compost – with many community groups, gardens and Parks eager to use it.

Community composting allows people to experience the concept of circularity firsthand; seeing food scraps become compost that is then returned to their own communities offers New Yorkers a tangible vision of how to live mindfully. Direct involvement in the process at drop-off sites teaches correct separation more effectively than the best signage, helping them form lifelong habits. **At the heart of community composting is local stewardship — an approach needed to maintain 21st-century green infrastructure which NYC has invested billions of dollars in**. For more information please see my opinion article written with Samantha MacBride, : Don't Kill Community Composting in NYC , pasted in following.

I would recommend that the size requirement for composting facilities should be reduced, to around 500 tons/ borough / year to start, and then phased in at higher amounts, through integration with Parks yard waste and considering use of Parks maintenance facility areas, and so much of the compost can easily be used directly in parks.

I am also in support of Commercial Waste Zoning, but have concerns with how it is currently structured. It needs to include robust reporting requirements for carters and DSNY itself to report data on collection tonnages for refuse, recycling and organics in order to calculate diversion rates, capture rates, and assess actual progress towards reducing the burden on commercial refuse on regional landfills and WTE combustors. These reports need to be made public at least twice a year. They can be aggregated by CWZ to protect both carter and customer anonymity, but they must be compiled using transparent methodology.
While CWZ law includes incentives for businesses to separate recycling and food waste, there are no such incentives for carters – as currently it is cheaper for them to dispose of food waste as trash.

The quality of public space and sidewalks is also critical – CWZ should tie into required shared waste containerization in the street, rather than continuing the proliferation of bins littering our sidewalks which can be observed citywide currently – often not in the permitted 3' zone adjacent to the building, but tied to street trees, DOT poles, street furniture etc. If CWZ allowed only one carter per zone it would incentivize larger investments on the carter side for shared in-street infrastructure.

Also CWZ should require use of the marine transfer stations to reduce the negative impacts on private transfer stations in Environmental Justice communities.

I also support of Bill 0352 to establish a working group on CWZ, which I hope would help ensure that CWZ addresses the above mentioned concerns.

I am glad to hear that the Commissioner wants the council to expand commercial organics separation laws, but don't understand why they are not enforcing current laws for commercial organics separation. I so often check the bins set out from many chain stores - just last week at McDonalds, Cava, and Starbucks – and so often see no bins for food waste, just for trash and maybe some cardboard recycling.

I am very happy to discuss or expand on any of these ideas further,

Respectfully,

Clare Miflin,
Executive Director, Center for Zero Waste Design

Don’t Kill Community Composting in New York City

Eliminating funding for NYC’s neighborhood network of food waste drop-off sites would be a significant blow to the city’s sustainability and climate resilience efforts.

Food waste is the part of garbage that makes it disgusting. When sealed in plastic bags with other trash, food waste putrefies, releasing foul odors and garbage juice, attracting rodents and roaches. When it winds up in landfills, food waste creates leachate and methane that pollute the land, waterways and air.

But when food waste is composted, it transforms into a nutrient-rich, environmentally friendly soil amendment: black gold. An ancient practice that has evolved over centuries of work by gardeners and farmers, composting is an effective way to bolster cities’ green agenda.

The social and environmental benefits of community composting are vast — yet New York City plans to permanently defund the largest, most successful program in the country. In November, Mayor Eric Adams announced cuts to the program to save $6 million in the city’s fiscal year 2024 budget, a fraction of a fraction

(0.09%) of the city's $7 billion gap. The mayor's preliminary budget, released Jan. 16, shows no funding for community composting through fiscal year 2028.

To justify defunding community composting, the city has pointed to the expansion of curbside organics collection — over the course of 2024, residents across the five boroughs will be obliged to separate their food scraps and participate in a citywide composting program. But the success of that municipal effort depends greatly on the existence of community composting. It's shortsighted of the city to eliminate this program, which provides so much to New York City on such a small budget. As experts on composting, waste management and regenerative urban systems, we urge the mayor to recognize that community composting is an integral part of his own vision for a more resilient, sustainable and equitable city.

In New York City, community composting grew out of grassroots efforts to reclaim disinvested neighborhoods in the fiscal crisis of the 1970s and '80s. In 1993, the Department of Sanitation (DSNY) launched the NYC Compost Project as an educational partnership with the city's four botanical gardens. Since then, community composting has grown to involve dozens of partners, including nonprofits like the Lower East Side Ecology Center, Big Reuse, Earth Matter and GrowNYC as well as parks, community gardens, schools and citizen volunteer groups. Every year, they manage hundreds of drop-off sites, process over 4,000 tons of food waste, engage thousands participants in activities, and provide education and outreach to more than 600,000 New Yorkers. The resulting compost is used in the communities where it is produced, nourishing gardens, parks and trees.

Community compost makes good soil — literally and figuratively. It enriches the earth at a time when the world's soils are degrading at an alarming rate, and it grows social bonds, civic awareness and a healthier society.

It's also a key partner in the city's broader green infrastructure and climate resilience plans. Over the past decade, New York City has invested billions of dollars in these efforts. Mayor Adams's own PlaNYC: Getting Sustainability Done, unveiled in April 2023, includes a host of promises to expand the city's tree canopy, create curbside rain gardens, reduce emissions and grow NYC's green workforce. Compost is integral to the success of these initiatives. It enhances the ability of soils to act as a carbon sink and to mitigate stormwater run-off. Adding compost to neighborhood parks, street trees and community gardens once or twice a year allows them to absorb up to 80% from a four-inch rainfall.

Across the US, other cities are expanding their community composting programs, which grew an average of 22% a year from 2010 to 2021, according to a composting census released by the nonprofit Institute for Local Self-Reliance. Municipal composting programs are also on the rise, with sanitation departments offering curbside bin collections for organic waste (food scraps and yard waste) alongside trash and recycling.

Both community and municipal programs are welcome given the vast quantity of food waste that still ends up in landfills. But the two are very different in terms of scale, process and benefits. Many municipal systems don't actually compost, but instead send organic waste to anaerobic digesters, where it is transformed into biogas and digester solids, as in Toronto. Digestate is nutrient-rich and potentially usable as fertilizer, though if the waste is co-digested with sewage in wastewater treatment plants — as it is in NYC — it often ends up in landfills. Municipally collected organic waste also contains contaminants like plastic bags and other non-compostable material, so the resulting compost or digestate may contain plastics, an issue the EPA is starting to study.

DSNY previously recognized how their support of community composting helped their municipal program. Community composting allows people to experience the concept of circularity firsthand; seeing food scraps become compost that is then returned to their own communities offers New Yorkers a tangible vision of how to live mindfully. Direct involvement in the process at drop-off sites teaches correct separation more effectively than the best signage, helping them form lifelong habits. At the heart of community composting is local stewardship — an approach needed to maintain 21st-century green infrastructure.

With under 5% of the city's organic waste currently being diverted, low participation in municipal composting is a problem that cutting the community compost program will make worse. DSNY would be wise to find $6 million in its $1.9 billion budget to preserve the program. Over the long term, the department could institute measures which both save costs and help achieve their zero waste and containerization goals. For example, DSNY could cut redundant trash collection on the 37% of city streets that are home to one- or two-family residences that currently get twice- or thrice-weekly pickup. If residents correctly separated recycling and organics, that trash would fit in a single bin per week. Once-a-week collection could save the city

Other city leaders see the value of saving this crucial community resource: 29 out of 51 City Council members and four of the five borough presidents sent letters imploring the mayor and DSNY commissioner to restore the community compost program's funding. They're joined by the more than 49,000 New Yorkers who signed a petition organized by activists that have banded together under the #SaveOurCompost banner. Meanwhile, time is running out: NYCCP has been forced to lay off staff and close food-scrap drop-off locations and would have been shuttered entirely were it not for private donations which are allowing partial operations to continue through June.

Over the next six months, as the budget is negotiated and adopted on June 5, New York City still has a chance to work towards a future of vibrant public spaces, thriving communities and a growing green economy. NYC has spent decades building up a successful community compost network. Let's not throw it all away.

Clare Miflin is an architect and executive director of the Center for Zero Waste Design, principal of design consultancy ThinkWoven, and member of the Save Our Compost Coalition.

Samantha MacBride is on the faculty of the Marxe School of Public and International Affairs at Baruch College, an advisor to Earth Matter NY and a former official for New York's Department of Sanitation and Department of Environmental Protection.

LES
Ecology
Center

Testimony before the NYC Council Committee on Sanitation and Solid Waste Management - June 3, 2024

My name is Christine Datz-Romero, and I am the executive Director of the Lower East Side Ecology Center. The Ecology Center has pioneered community based models in urban sustainability since 1987 and operates the longest running community based composting program in NYC. Since 1990 we encourage New Yorkers to bring their source separated food scraps to drop off locations, turn the collected organics into compost to green our neighborhoods.

We like to express our support for Int 0696-2024 to establish organic waste composting facilities in each borough. With the roll out of universal organics collection in all the boroughs by fall of 2024, we have an opportunity to maximize the environmental and social benefits of turning organic waste into a valuable soil amendment: compost. This process relies on aerobic decomposition of organic materials, both food and yard waste, in contrast to anaerobic digestion, which can only handle food waste, and if mixed with waste water at a DEP waste water facility, does not generate a useful end product. The current pilot at the Greenpoint Waste Water Facility does not deliver on the promise to utilize the generated methane gas in a beneficial way, and the digestate is used for landfill cover – in short this technology short changes our fight against climate change.

On the other hand aerobic compost facilities, will generate a valuable soil amendment, together with additional environmental and social benefits. The finished maximizes the capacity of soil to soak up storm water when utilized in street tree and rain garden maintenance. It can also be utilized to grow food in urban farms and to maintain green open spaces. To ensure that the compost is utilized, the city should require that locally produced compost is utilized in city contracts when Parks are created or renovated. There is also a tremendous market for compost and potting soil in the private sector, in short compost is a valuable commodity that will offset some of the costs of producing it.

The goal of creating capacity for 180,000 wet tons of organics to be handled in each borough is ambitious, and we would suggest creating facilities of different scales to reach this overall goal. Community based facilities such as the East River Park Compost Facility, which was a DEC registered facility from 1998 through 2021 is an example of medium scale facilities together with facilities run by BIG Reuse in Gowanus and Queens as well as Earth Matter on Governor's Island.

The biggest value of these community based facilities are their educational aspect, showing and inspiring New Yorkers how to participate in composting and why.

These community based facilities are a closed loop system that generates community cohesion, green jobs and avoidance of truck miles traveled and the creation of more facilities on public land, including park land were appropriate, should be encouraged.

June 3, 2024

Comments of Nelson Eusebio
Director of Government Affairs
National Supermarket Association (NSA)

Before the

New York City Council Committee on Sanitation and Solid Waste Management

Regarding

Int 352-2024

Chair Abreu and members of the Committee on Sanitation and Solids Waste Management – thank you for the opportunity to share comments today on the National Supermarket Association's position toward Int 352, which would establish a commercial waste zones working group. My name is Nelson Eusebio and I serve as Director of Government Relations for the National Supermarket Association (NSA). NSA is a trade organization representing the interests of independently owned supermarkets in New York City and beyond. In the five boroughs, NSA advocates for more than 400 supermarkets and 15,000 employees.

The NSA supports the creation of a commercial waste zones working group, however, we have concerns with the proposed composition of the working group. Specifically, there is a lack of representation of commercial and small business interest within the group. Small businesses, including NSA members, will be the stakeholders impacted most by the new rules and regulations and it is vitally important those interests have input and greater consideration. Additionally,

In response to our concern about the lack of representation for small businesses, we recommend that the bill require at least 2 positions in the working group be filled by an individual working in the small business or commercial interest space who will be directly impacted by the new program. At least one of those members should be a representative from the supermarket industry. This addition to the working group would give voice to the interests of the thousands of small businesses and those dealing with large amounts of garbage.

Thank you for the opportunity to share comments and we look forward to continuing our work

with the Council and DSNY on the implementation of commercial waste zones.

860 HUMBOLDT STREET
BROOKLYN, NY 11222
BIC # 501970

June 8, 2024

Chair Abreu, Councilmembers Chris Banks, David M. Carr, James F. Gennaro, Julie Menin, Sandy Nurse, Vickie Paladino, Rafael Salamanca, Jr., Sandra Ung, Inna Vernikov, Kalman Yeger, and Susan Zhuang:

I am the Chief Operating Officer of Cogent Waste Solutions, LLC (Cogent) and request that this letter be included in the hearing record.

Unfortunately, the Committee on Sanitation and Solid Waste Management's hearing on June 3, 2024, titled "Oversight of the Commercial Waste Zone Program" became a forum for unfounded accusations against Cogent. Cogent is proud to provide top level commercial waste removal service to the businesses of New York City. Our principals have been working in the commercial waste industry in New York City for more than 45 years combined, and we are proud of our level of success in the industry.

Based on customer count, today, Cogent is approximately the 4th largest waste removal company in the City. We aim to provide the highest level of service to our customers in a safe and efficient manner. We look forward to working with the New York City Department of Sanitation on the Commercial Waste Zones program, and with the Business Integrity Commission with respect to our licensing.

Safety at Cogent

Much was said at the hearing about our safety record. We take pride in our safety program, and always have. The waste industry can be dangerous, and New York City is a challenging place to collect waste given the density of the population and the number of vehicles on the streets, combined with the number of pedestrians, cyclists, e-bikes, and other modes of transportation all sharing the same space. For those reasons, Cogent is fully committed to ensuring the highest safety training standards for our employees and drives. We are fully in support of the worker safety training rules in the CWZ program and are in the process of fulfilling the training requirements by this summer's deadline (July 30, 2024).

Despite some comments made at the hearing, Cogent is an industry leader in safety. We have met all industry safety requirements, including those imposed by BIC and DSNY.

Every Cogent waste collection truck is equipped with side guards, GPS, multiple video cameras, and real-time driving metric analytics, meeting these standards well before the regulatory deadlines. And contrary to claims at the hearing that Cogent's vehicles are old and out of date, the age of Cogent's fleet is notably younger than the industry average, ensuring our vehicles are equipped with the latest safety features and technologies.

Regarding worker safety training for the CWZ program, all Cogent employees have already been trained on all 11 safety topics required by DSNY and the CWZ law. This training was conducted by Biderman Consulting LLC in early May 2024, well ahead of the July 30th deadline. Cogent has attached a letter from David Biderman of Biderman Consulting attesting to the completion of this aspect of our worker safety training program.

Cogent's worker safety training for this initial training period will exceed the 40-hour safety training requirement mandated for the CWZ program. Below is a snapshot of how Cogent will achieve and exceed the requirements.

- Cogent uses Smith Training as part of its safety program. This is the gold standard of our industry.
- Cogent has three Smith certified trainers on site, which is extremely high for a company of Cogent's size.
- Cogent drivers already have completed a six-hour defensive driving course.
- Cogent uses JJ Keller for online training.
- Cogent has five certified mechanics on site, who assist the drivers in their pre- and post-trip diligence.

As further evidence of Cogent's commitment to safety—and strong relationship with its unions—Cogent has attached a letter from Daniel L. Wright, President of Local Union No. 813 of the International Brotherhood of Teamsters, dated June 7, 2024. Mr. Wright states, "I believe Cogent's leadership takes safety very seriously. Their employees are currently up to date with the required safety training and are committed to adhering to policies and practices. I am confident Cogent, and its workforce will be an example going forward as the way things should be done. I look forward to . . . working with Cogent leadership to help attain the safest and best workforce in the industry."

According to the US DOT website, Cogent has significantly fewer crashes relative to its fleet size compared to its peers in the New York City waste industry. Larger companies have nearly three times the number of crashes, while smaller companies have a similar number of crashes despite their much smaller fleet sizes.

There has been one fatal crash involving a Cogent vehicle in the past 24 months, in January 2024. This occurred when a driver of a car crashed into a Cogent truck. We are deeply saddened by this loss of life. Any loss of life as the result of a traffic crash is tragic, and we express (and have expressed) our deepest sympathies. The Cogent driver remained at the scene and was not charged with an offense.

Based on an initial police report, the driver of the car that struck the Cogent truck was unlicensed, uninsured and traveling at a high rate of speed. Additionally, through independent investigation, we understand that the driver of the car that struck the Cogent truck had a revoked license and was traveling at more than 82 mph through a residential neighborhood when he struck the Cogent truck. Additionally, we understand that nearby cameras captured his car running more than nine red lights that night prior to the crash.

BIC Fine – Context

There was discussion at the hearing of a significant fine that Cogent paid based on a now concluded BIC Notice of Violation. Cogent settled this violation with BIC in January 2023. These were violations of BIC's rules—administrative charges that were not related to safety or Operations and we believe did not reflect on Cogent's integrity as an operator. We remain in good standing. It should be further noted in settling the matter, Cogent did not admit or deny any facts relating to the allegations. Cogent continues to hold a BIC license to operate throughout the City.

However, following this NOV we implemented new policies and procedures to ensure such violations likely would not occur again. One example is we implemented a centralized electronic filing system for tracking and managing all required documentation. We continue to improve all aspects of our operations and regulatory compliance. As also mentioned at the hearing we have agreed to 3rd party oversight of our operations when DSNY CWZ contracts commence later this year.

860 HUMBOLDT STREET
BROOKLYN, NY 11222
BIC # 501970

Cogent's Employees

During the hearing, it was also claimed that Cogent treats its employees poorly. This is an outrageous, unfounded claim. Cogent cares deeply about the well-being of its employees and treats them with respect. Cogent's employees are represented by unions. As evidenced by the Teamsters' letter referenced above, Cogent has a strong working relationship with the unions that represent its employees. In keeping with our collective bargaining agreements, Cogent provides its workforce with comprehensive benefits, including a 401k retirement plan and health insurance, ensuring our employees' financial and medical well-being.

Moreover, Cogent is committed to being an Equal Opportunity Employer, fostering a diverse and inclusive workplace where all employees are treated with fairness and respect. Our dedication to employee welfare and rights is a cornerstone of our operational philosophy and is reflected in our strong, supportive labor relations.

Cogent fully expects to be one of the most reliable, strongest partners with DSNY in the CWZ program, and we look forward to the implementation of our zones. We invite any and all members of the New York City Council's Committee on Sanitation and Solid Waste Management (and any of your colleagues who are interested) to arrange a visit to Cogent's facilities for a tour and to see our operations. We believe you will be pleasantly surprised at the level of skill and professionalism with which Cogent's facilities and vehicles are run.

We look forward to a continuing dialogue with the City Council, and to fulfilling our role and duties as a strong partner with DSNY in the CWZ program.

Sincerely,

Cogent Waste Solutions LLC

718 349 7555
718 383 2183
860 HUMBOLDT STREET
BROOKLYN, NY 11222

Local Union No. 813

48-18 Van Dam Street | Long Island City, NY 11101
(718)937-7010 | Fax: (718)937-7003
www.teamsters813.org

Affiliated With
International Brotherhood of Teamsters

June 7, 2024

To whom it may concern,

Please be advised that Local 813 has a working relationship with Cogent Waste, currently representing a portion of the workforce there, and soon to increase representing additional members of the workforce. I believe Cogent's leadership takes safety very seriously. Their employees are currently up to date with the required safety training and are committed to adhering to policies and practices. I am confident Cogent, and its workforce will be an example going forward as the way things should be done. I look forward to continuing to represent these workers and working with Cogent leadership to help attain the safest and best workforce in the industry.

Respectfully,

Daniel L. Wright
President

June 7, 2024

Nino Tristani
Cogent Waste Solutions
860 Humboldt Street
Brooklyn, NY 11222

RE: CWZ Safety Training

Dear Mr. Tristani:

This letter summarizes the recent Commercial Waste Zone (CWZ) safety training activities that Biderman Consulting, LLC provided to Cogent Waste Solutions (Cogent) at its facility in Brooklyn. This training was conducted to help Cogent comply with the Department of Sanitation's CWZ safety requirements per Section 16-1008.

On May 1, 2024, I provided approximately 3.5 hours of safety training to drivers, helpers, supervisors, managers, and other Cogent personnel. There were at least 100 Cogent employees in attendance. The safety training was conducted in English with simultaneous translation into Spanish.

The topics covered during this safety training included:

- Personal Protective Equipment (PPE)
- Pre-Trip Vehicle and Equipment Inspections
- Collision Avoidance
- State and Local Traffic Laws
- Preventing Distracted Driving
- Navigating Intersections and Turns
- Backing Up a Commercial Vehicle
- Best Practices for Safety Collection Stops
- Container Management
- Hopper Operation
- Fire Prevention and Response
- Transportation and Disposing of Specialized Waste/Hazardous Materials
- Disposal at Transfer Stations and WTE's

Please let me know if you have any other questions.

Sincerely,

David Biderman
Biderman Consulting, LLC

NEW YORK CITY COUNCIL
SANITATION AND SOLID WASTE MANAGEMENT COMMITTEE
CWZ OVERSIGHT HEARING

TESTIMONY OF DAVID BIDERMAN
BIDERMAN CONSULTING, LLC

June 3, 2024

My name is David Biderman. I am the President of Biderman Consulting, LLC, a solid waste consulting firm. I am the former Executive Director of SWANA and provide safety training and other services to about 10 New York City carters – both awardees and non-awardees. I have spent a lot of time over the past 4 months providing CWZ safety training to awardees.

The March 2024 DSNY hearing on the Queens Central pilot zone revealed it is not just the solid waste industry that is in the dark about the Department of Sanitation's CWZ implementation. Several of the advocacy groups who pushed forcefully for Local Law 199 expressed serious concerns about DSNY's lack of transparency. For all solid waste companies that currently collect commercial waste in New York City, this lack of transparency means they are unable to plan for the very significant changes that are coming to the City's system. Commissioner Tisch's testimony at today's hearing did not provide any actionable guidance to awardees, BIC licensees, customers, or other interested stakeholders.

The awardees need to know the schedule for CWZ implementation after Queens Central. Awardees need to buy trucks. It takes up to 12 months to get a new garbage truck delivered. Awardees need to hire workers. They need to be ready to implement plans, and gear up for a highly competitive battle to get customers on a zone-by-zone basis. The awardees are completely in the dark. Which zones will transition after Queens Central? When will that take place? What is the overall schedule? The awardees deserve to know the entire schedule - now.

The 30+ BIC licensees who are not awardees also need to know the CWZ schedule, so they can make some difficult business decisions. Do they sell now, or should they wait a few years until the neighborhoods in the zones in which their customers are located are subject to CWZ? Do they branch out into related businesses or nearby locations such as Long Island or New Jersey? These licensees also deserve to know the entire schedule – now.

I agree that DSNY needs to evaluate the implementation of CWZ in Queens Central before transitioning the other zones. I urge this Committee to play a meaningful role in that evaluation. However, DSNY could have identified – today - the zones that will start transition in 2025. For example, it makes a lot of sense for the other 4 Queens zones to be the next ones to transition to CWZ, perhaps beginning in Fall 2025 and concluding at the end of the year. The Bronx could transition in early 2026, Staten Island in mid-2026, leaving the boroughs with the most zones

(Brooklyn and Manhattan) for late 2026 into 2027. I would be very careful about transitioning zones during the summer, when trash left on the street can become fragrant.

The lack of transparency also extends to the bodegas, office buildings, stores, and other business establishments served by licensees. The Queens Central transition starts in three months. Virtually none of the 8,000 businesses in Queens Central are aware DSNY has selected the 3 carters they must choose from. DSNY needs to use all means necessary to communicate to businesses the impact of CWZ, needs to do so immediately, and in dozens of languages. DSNY testified that Metropolitan Strategies would be deployed on the street in Queens Central starting July 1. I don't think DSNY should be waiting yet another month to begin in-person outreach concerning this monumental change to waste and recycling collection.

A final point. Safety was one of the principal reasons for Local Law 199 and CWZ. Local Law 199 established a Safety Task Force. I was appointed to that Safety Task Force, which has not met since October 2022. This is unacceptable to me, and should be unacceptable to this Committee and the City Council. What is also unacceptable is the danger that e-bikes pose to all New York City pedestrians, and especially the hard-working men and women who collect solid waste. At every single safety training sessions I provide to New York City solid waste companies, I hear from workers about how e-bikes have near misses with them or their trucks on a nightly basis. As the New York Times noted just last week, e-bikes have made our city a nightmare. I urge this Committee, the City Council, and the Adams Administration to enforce existing traffic laws against these out-of-control road users. Work with the E-Vehicle Safety Alliance. It is the wild west on the street, and e-bike batteries are causing fires that are killing New Yorkers. All of us, including solid waste collection workers, deserve better. Thank you.

David Biderman
Biderman Consulting, LLC
David@bidermanconsulting.com

TESTIMONY OF ANDREA SCARBOROUGH
[redacted] ADDISLEIGH PARK NY 11434

HEARING ON CREATING A COMMERCIAL WASTE ZONES WORKING GROUP

Good-morning Chairman Abreu and members of the Sanitation and Solid Waste Committee. My name is Andrea Scarborough, I am a former president of my civic, Addisleigh Park Civic Organization, a Board Member of the Queens Solid Waste Advisory Board as well as a Board Member of the recently formed Southeast Queens Residents Environmental Justice Coalition (SQREJC). SQREJC is an organization that advocates for environmental policy changes and tangible improvements in the Southeast Queens community. Today I come before you speaking on behalf of the organization.

SQREJC is in support of Intro 0352-2024. The legislation will establish a commercial waste zone (CWZ) working group to study the implementation of the CWZs reform plan established by local law 199 of 2019 and make as needed, policy recommendations. This is exactly what is required at this juncture as the committee take steps towards implementation of this law.

Speaking as a resident that lives in proximity to waste transfer facilities, I am concerned as to the rules and regulations as well as oversight that will impact the "Haulers" but not the "Waste Facility Owners". In my community I have haulers as well as waste facility owners who are not haulers but they accept waste from the myriad of third party, independent truckers that exist. While the CWZ legislation clearly address haulers it is unclear if any consideration was given to the non-haul facility owners who are allowed to continue to accept waste from everyone including any independent trucker, as well as the public. It is unclear if any zone requirements that exist for haulers exist for those third-party truckers that do business at those waste stations.

What are the rules and regulations of those transfer stations under the Commercial Waste Zone Legislation?

Two of our members recently visited one of the waste stations in our area and was informed that they are not included in the CWZ law as they are not Haulers. SQREJC's concern is, if this is true, then does that mean that any independent

trucks from anywhere can continue to conduct their business with no regard for the newly implemented zoning laws put in place to reduce truck traffic and emissions/pollutants that take place in environmentally overburdened areas.

So, it sounds like "business as usual".

Our organization asks that Intro 0352-2024 be given full consideration and allow a CWZ task force to be established to address the flaws that may currently exist in the reform plan. Environmentally overburdened communities such as mine deserve no less.

Thank you for your time.

Andrea Scarborough
Board Member
SQREJC

New York City Council Committee on Sanitation and Solid Waste Management
June 3, 2024
Testimony by Anita Chan

Dear City Council Members,

My name is Anita Chan, a lifelong New Yorker, an Earth Matter NY board member, and a member of 350NYC WasteNot. I am testifying on my own behalf to express enthusiasm and concerns about the commercial waste zone reform plan, and support for Intro 0352-2024, Int 0696-2024, and T2024-2064.

In 2015, I was a canvasser for the Transform Don't Trash campaign where I learned about the private hauling services that all businesses in New York City have to pay for and how complicated, sometimes unreliable, and often expensive it is to the businesses, especially smaller ones. I have personally witnessed and heard many accounts from others about how unsafe driving and working conditions can be when these private haulers are involved. It is very common to see trucks barrelling down the street or making a stop by cutting across streets with two way traffic. That is why when Local Law 199 of 2019 was enacted, it was something major that I looked forward to but unfortunately the way it is now, it still isn't going to be as safe and effective as it was imagined to be several years ago. I agree with others who have expressed their concern about companies with terrible safety records being able to be contracted. There is no clear timeline on when other zones will come online, which doesn't allow for waste haulers to properly plan. Passing Int 0352-2024 to establish a commercial waste zones working group with diverse stakeholders representation is very important to ensure key data is captured to inform future changes and policy to improve on the plan. I also support T2024-2064 to ensure no one commercial waste hauler ends up monopolizing. Commissioner Tisch mentioned that recycling cost 32% percent less than trash while organics will cost 18% less than trash is a discount that is appreciated and hopefully will encourage waste diversion but I think it makes more sense to have a larger discount for organic waste than recycling considering the effective recycling rates are low and how organic waste can be turned into a beneficial resource hyperlocally.

Int 0696-2024 is absolutely crucial to divert organic waste from our waste streams and process it into compost locally for local use. Before the recent budget cuts, New York City already had at least one organic waste composting facility through the New York City Compost Project (Earth Matter NY, Big Reuse, The Lower East Side Ecology Center, New York Botanical Garden, Queens Botanical Garden, Brooklyn Botanic Garden, Snug Harbor Cultural Center & Botanical Garden) and numerous other community partners (GrowNYC, East New York Farms, etc). Numerous people have lost their jobs and operations, environmental education, and outreach have been drastically cut. We need the seven million dollars of funding to be restored to community composting immediately and ensure that it is the minimum guaranteed in each year's

budget. In addition, it is urgent to save Big Reuse from eviction by NYC Parks under the Queensboro Bridge. Composting is the most beneficial use of organic waste so we must invest in that. I support Council Member Nurse's vision of incorporating various sizes of facilities to process compost. While it is true that the capacity of existing composting sites cannot handle all of the organic waste that is produced in the city, turning organic matter into compost locally should be prioritized as *the* method of organic waste diversion above biodigestion, especially anaerobic co-digestion at Newtown Creek where New Yorkers have little transparency on. Separating food waste from the waste streams and turning it into compost, a usable beneficial resource for the city, helps cut emissions from shipping it elsewhere to landfill or incinerate, will deter rodents, nourish our soils, help grow nutritious food locally, provide a sense of community, and serve as a tangible way for individuals to combat climate change which contributes to better public health outcomes of New Yorkers. We need more, not fewer local compost processing sites where we can have community engagement and environmental education.

Sincerely,
Anita Chan

APPROVED STORAGE AND WASTE HAULING II, INC.
CT-BMW-073 • DEC PERMIT #3A-1160 • NJ DEP #38740 • NYC BIC #498788 • EPA ID #NYR000237487

June 3, 2024

Testimony for the Hearing of the Committee on Sanitation and Solid Waste Management

My name is Charles Dippolito, Jr., owner of Approved Storage and Waste Hauling, a commercial and medical waste carting business established in 1996, serves a range of customers throughout New York City and the Tristate area, including small businesses and large residential buildings, but more pertinent to this hearing, major health care-related and nursing home facilities.

I want first to point out an important omission in the Commercial Waste Zone (CWZ) program. To ensure public safety, the State Department of Health (NYS DOH) and City Department of Sanitation (DSNY) have created several sub-categories of waste, including construction & demolition debris (C&D), Regulated Medical Waste (RMW), and others. Each of these waste streams require special handling, can only be dumped at specifically permitted facilities, and in some cases require additional training and equipment to collect.

However, the solid waste industry has gone further than these subcategories to avoid potentially hazardous commingling, including the use of the term “Health Care” or “Institutional” Waste, used by post-collection operators, such as Waste Management, to describe any and all waste that is generated by a health care facility aside from RMW. This industry term developed to ensure best practices, since regulatory issues have occurred when, for example, an employee at a hospital mistakenly includes medical waste in a general solid waste bin, causing major disruptions when the error is discovered. This practice requires unique carting requirements Institutional Waste at health care facilities similar to those for medical. Therefore, Institutional Waste, like the sub-categories above, should be recognized as a specialized waste stream and merits an exclusion in the CWZ program.

Health care facilities can include hospitals, nursing facilities, and medical offices. Many entities, such as Northwell Health and Montefiore Medical Center, are just recently learning about the omission of Institutional Waste as an exempted waste stream in the CWZ program (see letters attached). Reasons they would cite as problematic are:

1. They want to retain a single hauler for their vast network of hospitals, offices, and nursing homes, which span many boroughs.
2. They are ultimately liable if contaminated or commingled waste arrives at a facility which is not permitted to handle specialty sub-categories.

3. They are more comfortable with the subset of companies with the expertise and training to differentiate regular medical waste from institutional waste that has been contaminated.

Once again, Institutional Waste from health care facilities is a distinct category from RMW and requires different handling than general solid waste. Even though DSNY may not recognize it as a standalone stream, the industry and NYS DOH permitting does account for its unique requirements. By including Institutional Waste in the CWZ exclusions, the program would more accurately reflect established industry best practices and keep the processing of health-related waste as safe as possible. Further, a single carter can be used to pick up health care facilities' waste streams, reducing trips and emissions as per the program's goals.

I hope you can address this issue through legislation or by advocating for new agency rules that allows consolidated hauling activities at health care facilities, and I am happy to serve as a resource as you explore this matter further.

Additionally, I would like to comment on Intro 352-2024, in relation to creating a commercial waste zone working group. It is important to convene an entity that will properly monitor the implementation and furtherance of the CWZ program. I am glad to see that the bill suggests at least eight (8) carters be appointed to this group, since members of the industry can provide practical and real-time feedback on the program's progress. However, I would suggest that either some of these eight appointed carters or a separate, additional number of carters be those that handle specialty waste streams – such as C&D, RMW, and others – to get an overall picture of the waste management ecosystem as this program evolves.

Thank you for your attention to these concerns.

Montefiore
THE UNIVERSITY HOSPITAL FOR
ALBERT EINSTEIN COLLEGE OF MEDICINE

2.23.24

Dear Sir/Madame,

I am writing to express concern regarding the newly-awarded commercial waste zone contracts in New York City. Montefiore Health System is one of New York's premier academic health systems, a recognized leader in providing exceptional quality and personalized, accountable care to approximately three million people in communities across the Bronx, Westchester, and the Hudson Valley. Our hospital proudly serves some of New York's most vulnerable communities through our hospitals and ambulatory care sites, positioning us as an important medical nexus in locations of highest need.

Two years ago, Montefiore began the process of consolidating its seven separate waste haulers into a single hauler contract. Not only was reducing logistical burdens a goal, but our position as a public insurance hub required strategic financial stewardship. The result of this effort was immediately apparent: reduced traffic, increased efficiencies, and streamlined A/P.

Due to commercial waste zone (CWZ) regulations and industry practices, the positive financial and environmental impacts of our waste consolidation is at risk. We believe that the spirit of the CWZ law would best be served by allowing medical systems such as ours to continue to deal with a single hauler who understands our waste stream, our time restraints, and is already onsite for other exempt streams. Please consider exempting institutional waste from the CWZ program to effectively carry out its intent.

Thank you for your time and consideration.

Respectfully,

Paul Jennings, PE
Associate Vice President

Facilities
111 East 210th Street
Bronx, New York 10467

Paul Jennings, PE
Associate Vice President, Engineering
718-920-7177 Office
718-920-5272 Fax
pjenning@montefiore.org

Northwell Health

1979 Marcus Avenue
Suite E-124
Lake Success, NY 11042
Tel (516) 396-6268
PMcCread@northwell.edu

April 2, 2024

To Whom it May Concern:

I am writing regarding the commercial waste zone program (CWZ) and potential unintended effects on health care operations and the environment.

As New York's largest employer, Northwell Health operates several medical facilities across New York City and the Tri-State Area. We are concerned about the hardship medical and health care facilities of all sizes will experience if they are required to decentralize their refuse operations among several haulers. Currently, a single hauler can service our multiple specialty waste streams across several facilities. Under CWZ rules, our many sites will require many new, separate contracts to service dozens of sites, with at minimum two haulers at each site due to the separation of biohazard and general hospital waste. Further, our understanding is that many waste transfer stations will not accept our general hospital waste, since cross-contamination is a concern that many station operators account for.

A single hauler who understands our waste stream is beneficial to our complex operations and to the street logistics involved in servicing our trash. I hope you will consider a continued conversation on this topic with vendors and institutions to ensure the CWZ program is successful in the long run.

Thank you for your time,

Phyllis McCready

Phyllis McCready
Senior Vice President & Chief Procurement Officer

The Manhattan, Brooklyn, Bronx, and Queens Solid Waste Advisory Boards (SWABs) are currently supportive of Intro 696-2024, which proposes the establishment of local compost capacity in each of the five boroughs of no less than 180,000 wet tons of organics annually. Intro 696 provides a blueprint for an ideal organics solution that is consistent with the four SWABs' June 2023 testimony[1], which recommends the City prioritize composting solutions for processing the city's residential and commercial organics streams.

Each year, New York City residents produce in excess of one million tons of organics, including food scraps and yard trimmings. Organics account for 43 percent of all residential garbage exported to landfills and incineration each year[2]. In Fiscal Year 2024, it is estimated that the city will have spent $200 million to export residential organics as waste. This cost is set to only increase each year, as it is tied to inflation. When we burn and bury our residential organics, we waste a valuable resource, waste money, and harm communities in and around our city and New York State, and beyond.

The four SWABs have the following suggested modifications to clarify some important elements of this bill:

1. In the re-establishment of a Compost Siting Task Force, explicitly include members from each of the Solid Waste Advisory Boards to represent communities in each borough in the establishment of these sites,
2. Explicitly include non-profits as eligible entities to contribute to the construction, operation, or maintenance of these facilities,
3. Prioritize current and recently-functioning community composting processing operators, including but not limited to Big Reuse, Earth Matter, Compost Power, BkRot, Red Hook Farms, GreenFeen OrganiX, Vokashi, the Lower East Side Ecology Center, and the Botanical Gardens.

Composting as a process and product beneficially sequesters carbon, emits less greenhouse gas than incineration, landfilling, or anaerobic co-digestion, and it enriches our urban soils, people, and community education and connection. The more local the collection, processing, and distribution, the greater the reduction of greenhouse gas emissions and air pollution. Local processing of organics as compost recognizes residential source-separated organics as a valuable resource and diverts this resource away from incineration, landfills, and co-digestion.

Recently, the City enacted Local Law 85 of 2023, signaling both a legislative and budgetary commitment to residential collection of source-separated organics, akin to the commitment made to conventional recycling in 2006. Although the curbside organics collection program is scheduled for full implementation by fall 2024, achieving fiscal success will require a capture rate of 35%, significantly

[1] 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

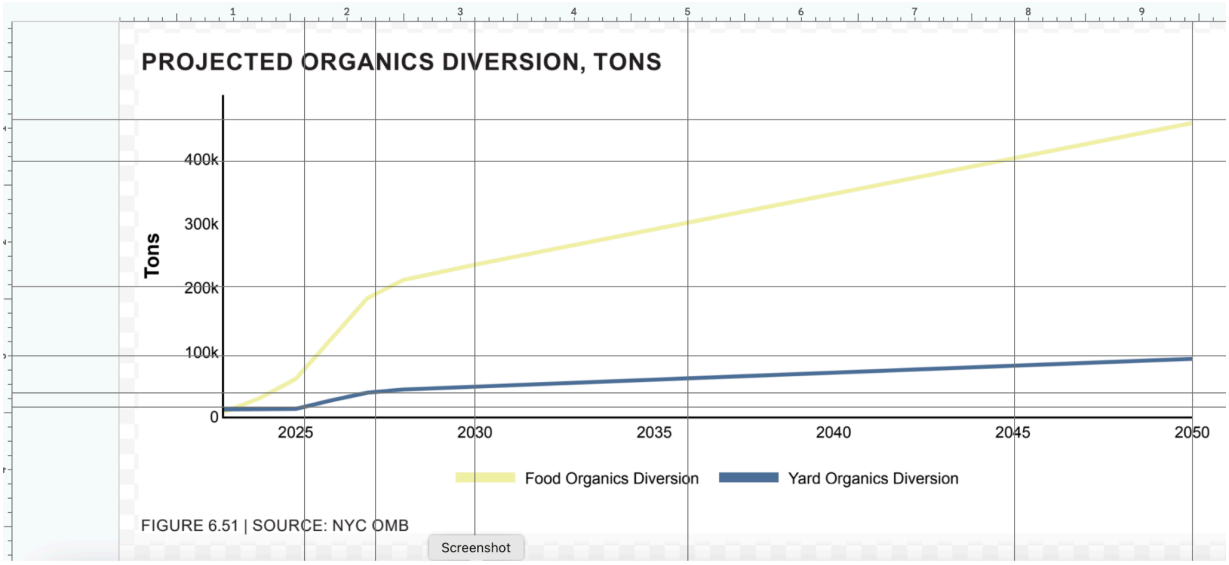
[2] 2023 DSNY Waste Characterization Study and calculated from 2023 NYC OpenData DSNY Monthly Tonnage Data found in this Workbook on sheet "Tonnage as of 2023"

higher than the current rate of approximately 4.3%.[3] The planned source-separated organics program primarily relies on a "user-friendly" system supported by planned enforcement measures, but, like recycling goals of 2006, it lacks a substantial commitment to community engagement, outreach, and education. Having tangible hands-on compost education opportunities through compost processing facilities in each borough established by Intro 696 will engender community confidence in the process and continue to increase participation.

Based on the Mayor's Office of Management and Budget's own projections, residential source-separated organics volumes will capture approximately 200,000 tons of organics by 2026, increasing linearly to an expected 50% capture rate, or 500,000 tons of organics annually by 2050. This would allow for the tandem development of local processing and distribution capacity in each borough to grow at a rate commensurate with the expected increase in captured organics volumes.

A local organics infrastructure will have the additional benefits of creating local green jobs within the city instead of exporting that valuable resource as garbage for disposal at great social, environmental, and financial cost.

The City of New York Executive Budget Fiscal Year 2025[4]



Intro 696 will encourage equitable distribution of organics processing throughout New York City, dismantling the legacy of overburdening environmental justice communities.

The SWABs request that any recommendations made by the Commercial Waste Zones Working Group as specified in Intro 352-2024 be made public.

[3] POLICY BRIEF FOLLOWING A PERFORMANCE ANALYSIS OF THE QUEENS RESIDENTIAL CURBSIDE ORGANICS ("COMPOSTING") PROGRAM CALENDAR YEAR 2023

[4] NYC Climate Budgeting | TECHNICAL APPENDICES

manhattanswab1@gmail.com ♦ swab.brooklyn@gmail.com ♦ queensswab.nyc@gmail.com ♦ bronxswab@gmail.com

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, June 2023

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.[5]

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 CO_2.

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.

[5]Biosolids Generation, Use, and Disposal in the United States U.S. Environmental Protection Agency Municipal and Industrial Solid Waste Division Office of Solid Waste EPA530-R-99-009 September 1999, pg 3

manhattanswab1@gmail.com ♦ swab.brooklyn@gmail.com ♦ queensswab.nyc@gmail.com ♦ bronxswab@gmail.com

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 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-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}-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-Henicosafluorododecyl 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-carboxa

mide ●
(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-1,4,4a,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-(trifluoromethanesulfinyl)-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-pentoxapentasilecane ● 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 ●

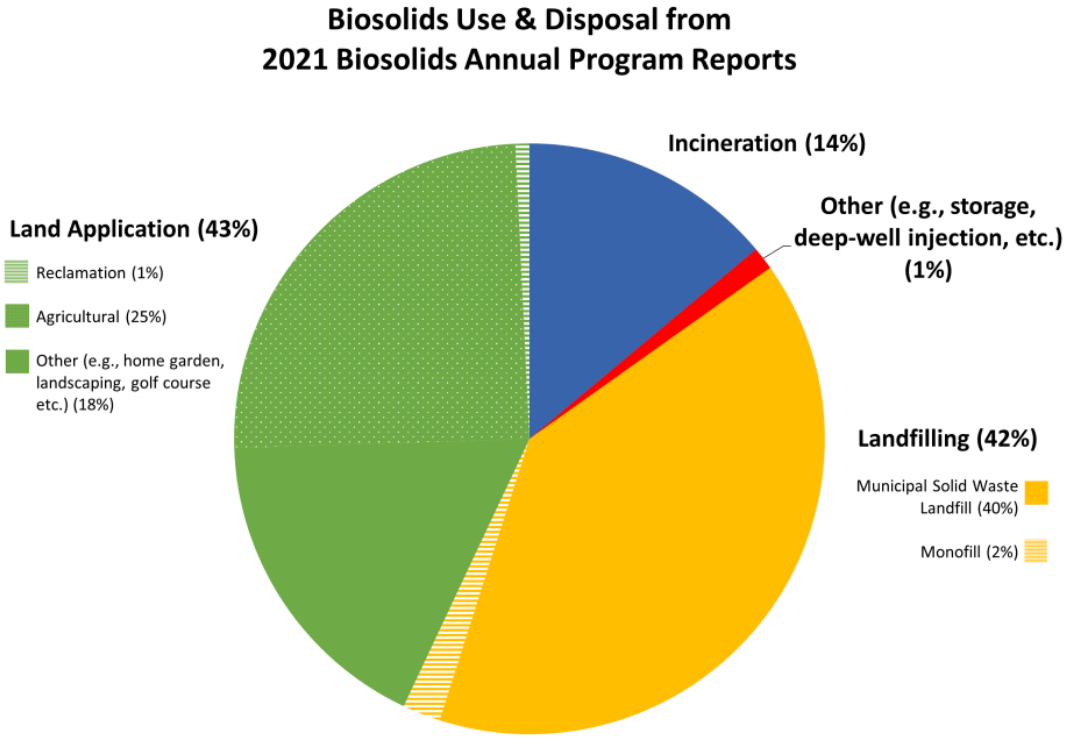
(4R,4aR,5S,5aR,6S,12aS)-4-(Dimethylamino)-3,5,6,10,12,12a-hexahydroxy-6-methyl-1,11-dioxo-1,4,4a,5,5a,6,11,12a-octahydrotetracene-2-carboxamide ● 2,4-Dibromo-1-(2-bromophenoxy)benzene ● Dichloromethane ● 2,2',3,3',6-Pentachloro-1,1'-biphenyl ● 5beta-Cholestan-3beta-ol ●
rel-(1aR,2R,2aR,6S,6aS,7S,7aS)-3,4,5,6,9,9-Hexachloro-1a,2,2a,3,6,6a,7,7a-octahydro-2,7:3,6-dimethanonaphtho[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-ylcarbamothioate ● ●
(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-methoxy-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 ● 2,3',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}diazenyl)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-(phenylcarbamoyl)-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 ● Tricosafluorododecanoic 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-carboxyli

c 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 ● 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] ● 1,2,3,4,7,8,9,10,13,13,14,14-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 ● Henicosafluoroundecanoic 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 ● Heptacosafluorotetradecanoic acid ● Bis(2-ethylhexyl) benzene-1,2-dicarboxylate ● O,O-Dimethyl O-[3-methyl-4-(methylsulfanyl)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 ● Dioctyl benzene-1,2-dicarboxylate ● 2-Benzyl-4-chlorophenol ● Manganese ● 2,3,4,7,8-Pentachlorodibenzo[b,d]furan ● 5-Chloro-N-(2-{4-[(cyclohexylcarbamoyl)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]sulfanyl}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)sulfanyl]-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 ● 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 ● Henicosafluorodecane-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-{[(4R)-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 ● Triacontane ● 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-enenitrile ● 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-Hexamethyltetracosa-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]phenanthren-7-one (non-preferred name) ● Pentacosafluorotridecanoic 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



On Intro: 696
Joyce Bialik

Dear Council Members and others. I am Joyce Bialik, a member of the Manhattan Solid Waste Advisory Board and WE ACT for Environmental Justice. I am testifying on behalf of myself to support Intro 696 and to recommend certain improvements in the bill. Intro 696 establishes organic waste composting facilities in each borough to produce 180,000 wet tons of organic waste annually. This level of composting will help correct the imbalance that currently favors anaroebic codigestion over compost. The compost also will be a correction of that produced by the Department of Sanitation in Staten Island where plastics are part of the content. Plastics are not permitted at the new composting facilities.

All positive so far. My main concern is whether large numbers of residents will be adjusting their habits to divert their food scraps from their trash. A recent survey by WE ACT looked at impediments to such habit changes. We found that many people were misinformed about food scrap diversion and rodents and insects. Separating food scraps from trash does not increase rodents and insects in our midst. In fact, many residents require instructions about where to safely keep their food scraps in the kitchen. Such concerns could explain the very low diversion rate in Queens and Brooklyn of less than 5 percent. My question is what is the value of more places to capture food scraps when a large number of our citizens are not participating in the project?

A good answer is reaching out and educating folks about best food scrap diversion practices and the reasons why our participation can lessen climate change. WE ACT and the Manhattan SWAB prepared and are using a presentation to address these issues, but DSNY needs to take outreach and education across the city if we want to use our composting options.

June 2, 2024

Maria Fernandez
37th Street
Astoria, NY 11103

Dear Sanitation and Solid Waste Committee:

I would like to express my full support for the bill Int 0696-2024 which aims to establish organic waste composting facilities in each borough.

I believe one of the most important factors of this bill is the initiative that includes community engagement and environmental justice considerations, because without this and proper education, similar initiatives are bound to fail.

I am also happy to know this also calls for community composting and mandates that facilities like Big Reuse and the Lower East Side Ecology Center remain operational.

This bill can greatly expand composting across the city in favor of community composting, Big Reuse, and the Lower East Side Ecology Center.

DSNY's greenwashing is completely unacceptable.

For the past few decades, community compost has been proven to work!

Please, we cannot continue to go backwards.

Kind regards,
Maria Fernandez
Astoria, Queens

My name is Mary Krieger and I speak on behalf of It's Easy Being Green. It's Easy Being Green is a neighborhood environmental action group on the Upper West Side. We have been active since 2019 in educating our neighbors about composting through building outreach, door-knocking , and dissemination of information at local events. I speak today in support of Intro 0696-2024. I thank the sponsor, CM Nurse and the chair of this committee, Shawn Abreu, for their environmental leadership.

There are 3 reasons to support this forward-looking proposal:

1. We need to avoid the carbon emissions involved in transporting the massive amounts of food scraps which will accrue when composting becomes mandatory. Building facilities in each borough will slash these emissions.
2. Most landfills cannot compost food scraps. These food scraps emit methane, a potent greenhouse gas. State-of-the art facilities like the one in Staten Island emit no greenhouse gases. Local sites run by composting groups also do not emit greenhouse gases,
3. New York should not outsource the pollution from its trash to communities, especially social justice communities, in other places. With the increased volume from mandatory composting, the likelihood that the city will send compost to the same landfills that handle our trash increases creating a need for expansion of those facilities and more pollution in those communities. Commissioner Tisch to the contrary in her comments in the New Yorker article, New York should care about what happens to its waste stream. The lesson all kindergartners learn holds true for New York: clean up after yourself.
4. Composting in our own facilities will save New York taxpayers money by reducing the money spent on landfills.

My advocacy for the borough-wide composting facilities does not preclude support for existing composting facilities run by Big Reuse and other private groups. When their outreach workers came to our buildings we saw an increase in participation in Curbside Composting. Their services are essential for a successful rollout of mandatory composting. I hope that the city council will restore funding for their programs.

Testimony by Nathalie Huang, Member of the GrowNYC Workers Collective
New York City Council Committee on Sanitation
Chair Shaun Abreu
Oversight - Commerical Waste Zones
June 3, 2024

Good morning Chair Abreu, and members of the Sanitation Committee. My name is Nathalie Huang, and up until May 20th of this year, I was a Compost Coordinator in GrowNYC's Compost Program which served New Yorkers for roughly 12 years, but myself and my whole department were laid off due to our program having no more funding to continue our program. GrowNYC's Compost Program and the NYC Compost Project have suffered detrimental losses in our shared goals in community composting since December when the Mayor cut our entire budget. Today I am writing in support of the local community composting facilities GrowNYC was once partnered with, namely Big Reuse and Earth Matter, both organizations under the NYC Compost Project, which used to process and create finished compost from the food scraps collected GrowNYC's public food scrap drop-off sites.

As you all know, Councilperson Nurse is introducing the bill Intro 696 which will require the Department of Sanitation to establish at least one composting facility in each borough. It does not make sense if this bill passes for the local community composting facilities that still exist to not be considered as permanent viable options for the Department of Sanitation to collaborate with to ensure food scraps can be processed in each borough. Big Reuse, before the budget cuts, had 3 composting facilities – one at Red Hook Farms in Red Hook, a second in Gowanus, and a third under Queensbridge Park. They supported over 70 community locations in Brooklyn and Queens with taking in excess food scraps collected from the public and processing them at their composting facilities. I was the regular GrowNYC Compost Coordinator in Bay Ridge on Saturdays for a select number of hours throughout the day collecting food scraps from local residents, but it was also especially helpful for them to have the extra option of a 24/7 Big Reuse drop-off they could access at any time. I completed some of my volunteer hours as part of my training to become a Master Composter by working at Big Reuse's Gowanus composting facility, where I was amazed to learn the food scraps collected at Big Reuse's Bay Ridge site were also processed at this facility.

Similarly, Earth Matter has had a profound role in being able to collect food scraps from multiple local areas in New York City, including all the organic waste generated on Governor's Island, and ensuring everything is being composted on Governor's Island locally, without those scraps ever having to be transported further out from where they originated from. I cannot fathom the Department of Sanitation not making both Big Reuse and Earth Matter part of the

infrastructure for not only continuing to compost food scraps but also investing on expanding their operations so they can take in and process more organic waste.

We all know that most of the organic waste collected through the curbside brown bin program and the orange smart bin program is not turning into finished compost. Instead the majority of that waste is going to facilities where they undergo anaerobic co-digestion, where they are mixed with sewage and a byproduct from the process of those materials being turned into biogas is they have leftover biosolids which are too contaminated to be used for any purpose besides being landfilled. This process is not sustainable and creates more waste, unlike when food scraps are composted locally by organizations like Big Reuse and Earth Matter.

Please consider the fact The NYC Compost Project has, for decades, been the reason why people have had opportunities to get in-person, hands-on experience with composting education, activities, and learning. Their staff members teach people all about compost and those people in turn can do the same for others. The Department of Sanitation has a lot to learn from them, and rather than trying to eliminate those valuable, efficient organizations, they should be working in collaboration with them in making New York City a cleaner, healthier, and more equitable place for all, including making sure everyone is well-equipped with the knowledge and resources about composting. DSNY cannot have successful citywide organics collection programs without the workforce and labor of community composters and all the wonderful people who once worked in that field and have since been laid off from their jobs. I implore the City Council to make it a permanent priority in the upcoming budget to get full funding baselined and restored for GrowNYC's compost program and The NYC Compost Project.

Thank you for your time,

Nathalie Huang
Queens

Written Testimony

May 24, 2024

RE: Commercial Waste Zones (CWZ)

To whom it may concern:

My name is Pauline Yeap and I have been working at D&D Carting Co., Inc., a solid waste collection company licensed by the New York City Business Integrity Commission as the Office Manager for 12 years. D&D is headquartered in Brooklyn and collects commercial waste in Manhattan and Brooklyn. I am writing this letter in my individual capacity, although D&D's owners are aware of it.

D&D has been providing high-quality solid waste collection services to its customers for more than ninety years. It is one of the oldest companies in the New York City solid waste industry, and I am proud to be part of this family. Unfortunately, D&D's future existence is at risk due to the Department of Sanitation's (DSNY) misguided selection process for awarding "zones" under the Commercial Waste Zone (CWZ) system, therefore my job is at risk, which is what has compelled me to write this letter.

D&D responded to DSNY's RFP and applied to provide service in 2 of the 20 zones (in Brooklyn and Manhattan). D&D recognized that solid waste collection and disposal imposes an undue burden on certain low-income neighborhoods in Brooklyn, and proposed in its bid to dispose of waste at one of the DSNY-owned Marine Transfer Stations (MTS). By bringing waste to an MTS, the noise, emissions, and traffic issues associated with solid waste trucks and tractor-trailers going to and from a land-based transfer station would be eliminated. One of the principal reasons for establishing the CWZ system under Local Law 199 was to reduce environmental burdens and vehicle miles traveled.

Even though waste disposal at an MTS would be more expensive than at a private sector transfer station, D&D included it in its bid because the company's owners believe it is worth spending more money to protect disadvantaged communities. For this reason, D&D's proposed rate for its bids in the two zones it bid on likely was higher than the bids of the three companies who were awarded those zones.

This is outrageous to know such a company like ours has been penalized because it tried to do the right thing and help New York City residents. This letter not only represents me as a minority – Asian-American in this industry, but it also represents my co-workers and dozens of persons of color – primarily Blacks and Latinos – who will likely lose their jobs if D&D is forced out of business. I am so fortunate to have worked for a benevolent company like D&D for over a decade that provides me with a flexible schedule so I can properly provide care of my elderly mother and autistic child, while still working a full-time schedule. I sincerely doubt that the large companies who were given the vast majority of CWZ awards will provide such flexibility to

their employees, and I am very concerned that I will have great difficulty finding another job in this industry.

D&D is not a perfect company, but it strives to be the best in class. For example, it provides top-notch safety training to its drivers and helpers on a frequent basis. They bring in an outside safety trainer who is among the leading solid waste safety experts in the United States. I participate in these safety meetings and see the increased awareness by the front-line workers concerning their safety and the safety of other street users (pedestrians, etc.). Other solid waste companies, including some awardees, pay lip service to workers and street safety. Particularly in light of the fatal incident earlier this month involving a CWZ awardee, I consider it very concerning that D&D was not awarded a zone yet companies that have lesser safety programs were awarded multiple zones in Brooklyn.

I am unable to testify at the June 3 CWZ Oversight hearing. However, I thought it is important to bring these issues and concerns to your attention. CWZ is a great idea, if properly implemented. D&D supports CWZ and the goals of reducing vehicle miles traveled, diverting more waste away from landfills, and improving safety. I am very concerned about losing my job, and also about the potential impact of CWZ on D&D's customers in Brooklyn and Manhattan, who will likely face sharp price increases after CWZ is fully implemented. Once Sanitation's CWZ monopoly system for waste collection is established, it will be impossible to eliminate it.

Thank you for the time to read my email, and I sincerely hope that you consider the issues raised in this email as you conduct the hearing and perform oversight over DSNY's CWZ program. I can also be reached at 917-519-1234 or email lhpauline79@hotmail.com.

Regards,

Pauline Yeap

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Deputy Commissioner Orlin

Address: _____

I represent: DSNY

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Deputy Commissioner Marshall

Address: _____

I represent: DSNY

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Commissioner Tisch

Address: _____

I represent: DSNY

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 0352 Res. No. _____

☒ in favor ☐ in opposition

Date: 6/3/24

(PLEASE PRINT)

Name: Brian Gardner of Cole Schotz P.C.

Address: 1325 Ave Americas NY NY 10019

I represent: Faztec Industries

Address: Staten Island, N.Y

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Director of Policy Mathics

Address: _____

I represent: BIC

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Commissioner Crotty

Address: _____

I represent: BIC

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 6/3/24

(PLEASE PRINT)

Name: ALIA SOOMRO

Address: _____

I represent: NY League of Conservation Voters

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 696 Res. No. _____

☐ in favor ☐ in opposition

Date: 6/3/2024

(PLEASE PRINT)

Name: Matthew Ciello

Address: 311 West 50th St. NY NY 10019

I represent: Manhattan Solid Waste Advisory

Address: Board

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Noger Cerr

Address: 151 W 30th St.

I represent: NYLPI

Address: 151 W 30th St. NY, NY 10001

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jenille Scott

Address: 50 Broadway NY NY 10004

I represent: ALIGN / Transform Don't Trash

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Brooklyn Borough President Antonio Reynoso

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Josh Kellermann

Address: 370 7th Ave NY NY

I represent: RWDSU

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: June 3, 2024

(PLEASE PRINT)

Name: Sharon Brown

Address: [redacted]

I represent: _____

Address: Jamaica NY 11436

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☑ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: ERIC GOLDSTEIN

Address: _____

I represent: Natural Resources Defense Council

Address: 40 West 20 St NYNY 10011

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 0696 & 944 Res. No. _____

☐ in favor ☐ in opposition

Date: June 3, 2024

(PLEASE PRINT)

Name: Mary K[illegible]

Address: [redacted]

I represent: It's Easy Being Green

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Charles Dipollito

Address: N/A.

I represent: Approved Storage and Waste Hauling

Address: N/A.

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 696 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jane Selden

Address: [redacted] NY, NY 10009

I represent: 350NYC

Address: —

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Christine Date-Romero

Address: 299 E 8th St

I represent: Lower East Side Ecology Center

Address: P.O. Box 20488 NY 10009

Please complete this card and return to the Sergeant-at-Arms