

Proposed Recycling Rules  
October 22, 2015

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PUBLIC HEARING  
ON THE  
DEPARTMENT OF SANITATION'S PROPOSED RULES  
GOVERNING RECYCLING REQUIREMENTS FOR ENTITIES THAT  
RECEIVE PRIVATE CARTER COLLECTION

THURSDAY, OCTOBER 22, 2015

125 WORTH STREET  
2ND FLOOR AUDITORIUM  
NEW YORK, NEW YORK

Reported By:

Jennifer Cassella

Proposed Recycling Rules  
October 22, 2015

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HEARING CONVENED AT 10:08 a.m.

PRESENT:

Madelynn Liguori, Associate Counsel, Bureau of Legal  
Affairs, New York City Department of Sanitation

Also Present:

The Public

Proposed Recycling Rules  
October 22, 2015

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SPEAKERS ON THE PROPOSED RULE:

Steve Changaris, NYC Chapter National Waste &  
Recycling Program

Justin Wood, New York Lawyers for the Public Interest

Thomas Ferrugia, The Broadway League

Eric Goldstein, National Resources Defense Council

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

MS. LIGUORI: Good morning. Hi. I think we're going to get started. Good morning and welcome. My name is Madelynn Liguori. I am Associate Counsel in the Bureau of Legal Affairs for the New York City Department of Sanitation. Thank you for attending the Department's hearing this morning.

The Department is conducting this hearing in accordance with the requirements of the City Administrative Procedure Act. The purpose of this hearing is to receive comments from the public on the Department's proposed rules governing recycling requirements for entities that receive private carter collection. The Department published the proposed rules in the City Record on September 8th, 2015. The Department also mailed copies of the rules to all New York City local elected officials, the City's fifty-nine community boards, media and interested parties, and published the proposed rules on the Department's website.

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

Businesses in New York City are required to recycle in accordance with the Department of Sanitation's commercial recycling rules promulgated pursuant to Local Law 87 of 1992, which amended Section 16-306 of of the Administrative Code. Private carters that collect from commercial waste generators in New York City must recycle source separated designated recyclable materials, including paper, cardboard, metal, glass and plastic.

The proposed rules would revise the City's current commercial recycling rules to simplify the requirements, which would make them more understandable for businesses and easier to follow.

Currently, certain types of businesses are required to recycle different materials than other types of businesses.

Eliminating the distinction between business types and applying the same rules for all businesses will facilitate greater recycling participation and make recycling easier for businesses. In addition,

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

1  
2 allowing single stream collection and  
3 recycling, which is when all designated  
4 recyclable metal, glass, plastic and paper  
5 are placed in the same bags or bins by a  
6 business, and co-collection of recyclables,  
7 which is when all designated recyclable  
8 metal, glass and plastic is source  
9 separated from designated paper by the  
10 business, but a private carter places the  
11 source separated materials into the same  
12 compartment of a waste hauling truck, will  
13 help make commercial recycling easier to  
14 manage and significantly increase diversion  
15 of recyclables from landfills.

16           Specifically, these proposed rules:  
17 Designate a number of recyclable materials,  
18 including, but not limited to, metal,  
19 glass, plastic, and paper, to the list of  
20 items that all businesses that receive  
21 private-carter collection and that generate  
22 these recyclable materials are required to  
23 recycle; prohibit the commingling of any  
24 designated recyclable materials with solid  
25 waste; allow private carters, in addition

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

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2 to the separate pick-up of designated  
3 recyclable materials, to utilize single  
4 stream collection of recyclables and  
5 recycling or the co-collection of  
6 recyclables; require any generator of  
7 private carter collected waste to post a  
8 sign identifying: One, it's private  
9 carter; two, each designated recyclable  
10 material that will be collected by each  
11 private carter; and three, if such private  
12 carter will be utilizing single stream  
13 collection and recycling or co-collection  
14 of recyclables; provide implementation and  
15 notice requirements for owners, net  
16 lessees, or persons-in-charge who arrange  
17 for private carter collection, and set  
18 forth recycling requirements for their  
19 tenants and occupants; set forth certain  
20 responsibilities for operators of  
21 non-putrescible and putrescible solid waste  
22 transfer stations if such facilities  
23 receive bags of recyclable materials.

24 And lastly, the Department's  
25 proposed rules include enforcement

**Proposed Recycling Rules**  
**October 22, 2015**

8

Proceedings

1  
2 compliance in accordance with the New York  
3 City Administrative Code. These rules will  
4 not become effective until July 1st, 2016,  
5 and the Department will not begin  
6 enforcement until July 1st, 2017. During  
7 this time period, the Department will  
8 engage in extensive outreach and education  
9 and will allow both generators and private  
10 carters to adapt to the new requirements.

11 A court reporter is present today  
12 and will record the hearing. You may  
13 present an oral statement or submit written  
14 comments concerning the proposed rule.  
15 Please sign in at the entrance of the room  
16 if you wish to present an oral statement  
17 today. We have been accepting written  
18 comments on the proposed rules since their  
19 publication. Today is the deadline for the  
20 submission of written comments.

21 The Department will make available a  
22 copy of all written comments received  
23 through today, together with the hearing  
24 transcript, for viewing on its website next  
25 week.

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

The Department will carefully consider all the comments it receives today at the hearing and all written comments it receives.

I will begin calling those of you who wish to speak this morning in the order in which you have signed in. When you speak, please state your name and affiliation and speak slowly and clearly so that the court reporter can understand and accurately record your statement.

I'd like to call Steve Changaris from the New York City Chapter of the National Waste and Recycling Association. Thank you.

MR. CHANGARIS: Good morning. Thank you for this opportunity to present industry comments regarding these proposed regulations. My name is Steve Changaris. I'm the New York City Chapter Manager for the National Waste and Recycling Association, a trade association with the private companies that collect and manage the recyclables and the waste generated by

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

the citizens and the businesses of the City.

First, the New York City Chapter of the National Waste and Recycling Association supports the hiring of these regulations, we support the hire and best use of materials and efforts to divert as many of our after use select materials into reuse and recycling programs, and to limit the amount of material and decrease the amount of material going into disposal. So that's on the first level. We support the big vision of this regulation.

Second, we actually support the changes. We too believe that a uniformed system for all businesses in the system, one unified system for all recyclables will make it more convenient and understandable for all involved, from the generator to the consumer product manufacturer, to the carter, to the facility operators, to the work crews at night who have to manage the recyclables in the buildings, and the property management companies up and down

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

the chain of those who are involved in generating and managing the recyclables. It's a good thing for all.

But we do have some practical concerns about how the regulation will be implemented and we'll go through those. First, we'd like to, as we have some expertise in this, we pick these materials up every day, we manage them, we're sensitive to the needs of the generators, we're sensitive to the capacities and the abilities of the material recovery facilities to process the materials, and we're certainly sensitive to the markets that actually absorb the materials and work from disposal.

We first want to go on record saying the generators really need a lot of help here to comply with the regulations. Technical assistance and financial supports will be very important. Customers -- currently many customers comply with many elements of this proposed regulation, but many do not. And for

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

1  
2 example, customers with  
3 recycling -- customers who have recycling  
4 systems based pretty much on fiber  
5 collection are going to need to integrate  
6 the bottles, cans, metals, and other  
7 materials into their systems, and that's  
8 going to take a lot of work with their  
9 employees, with their building maintenance  
10 people, with their janitorial and cleaning  
11 services, and all the way down to the back  
12 dock. So they're going to need a lot of  
13 technical assistance and support to get  
14 those procedures changed.

15           The other piece of that is at the  
16 same time, many of these businesses that  
17 are going to be changing their systems over  
18 to accommodate these new recycling ways,  
19 are also going to be contemplating with how  
20 to respond to the organics regulations.

21           The other piece that we  
22 wanted to note and we wanted to raise was  
23 that we believe in a market-based system.  
24 Currently, all the wastes and recyclables  
25 that are collected in the City are done

Proposed Recycling Rules  
October 22, 2015

13

1 Proceedings

2 under a BIC rate cap, which is a consumer  
3 protection regulation. With that said, as  
4 an industry we believe in a free market  
5 arrangement. We like to be in a commercial  
6 relationship with our customers. We  
7 believe sometimes the rate cap works  
8 against recycling and that we'd like to  
9 work in an environment without the rate  
10 cap, and certainly if the rate cap doesn't  
11 go away, we'd certainly like to see some  
12 relief on the -- and adjustments to the  
13 rate cap so that we could manage and get  
14 these materials to market more efficiently.

15 The other thing is as much as we  
16 call for incentives for the generators,  
17 we're also calling for incentives and  
18 supports for the facilities too.  
19 Additional materials will have to be  
20 managed to be diverted; recycling  
21 facilities, carters, cart programs.  
22 There's a bunch of people who are going to  
23 have to get involved to see that these  
24 materials are diverted. So as much as the  
25 generators are going to need technical

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

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2 assistance and support to isolate the  
3 materials and get them to the loading dock  
4 so we can collect them, the places we take  
5 them to are going to need help too, whether  
6 it be a current recycling center that is  
7 managing fiber is going to have to adopt  
8 and add a bottle or can line, or whether  
9 there are other supports for collection and  
10 aggregation of materials.

11           The other -- we have three other  
12 points on the actual regulation. There's  
13 no call for a di minimis level of  
14 recyclables in the material and in the  
15 waste we collect. There's no call for  
16 waivers for customers who have a  
17 particularly difficult time implementing  
18 the regulations, and there's no mention of  
19 what the legal cause and penalties for  
20 generators who fail to comply. A certain  
21 amount of recyclable material will get into  
22 the waste stream and we -- regulations do  
23 not speak to that and we'd like to see some  
24 discussion there to establish a reasonable  
25 level.

Proposed Recycling Rules  
October 22, 2015

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Proceedings

The other piece of that is some customers will have legitimate difficulty complying with the regulations. The other piece is if the adoption of these regulations detracts or hurts an existing program that is doing a good job, there should be some consideration given to the generator for that.

And the last piece of that is, if we are actively supporting these regulations and providing the services to our customers, if the customer doesn't perform properly under the regulation and those recyclables show up in our waste loads, the haulers doesn't want to be penalized for that.

Three wrap up points and I'll be done. We believe we'll use this opportunity to call for the City to create a routine and ongoing solid waste and regularly stakeholder process. We'd like to have been involved in some of the crafting of these rules -- the proposed rules before it hit, the register. And

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

other cities do this and we think the City of New York should have an active ongoing solid waste and recycling stakeholder process.

Another area that the City should focus on is doing routine and regular updates on the recycling markets. We can recover these materials but if we don't have a market to take them to, it doesn't complete the loop. Markets are not robust and good today. The world economy slowed down, and the City should be able to take a pulse and help people understand what's going on in the world of commodities and recovery, and in particular glass. Glass is a very difficult commodity to manage. It's a lost leader, so to speak. In our world, we divert it from disposable and into the use markets and into beneficial uses, but it's difficult to manage, and other materials like metal and plastics are having a hard time in a very soft market. So periodically, routine updates to the recycling markets City reports would be

Proposed Recycling Rules  
October 22, 2015

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Proceedings

very helpful for us and for the people involved in this area.

The last point is that it's very good to work with inside the regulatory framework to divert materials and see that the hire and best use is achieved to the last and longing step possible, but sometimes the regulatory structure prevents innovation and changes in the marketplace. There's a lot going on with how with we manage our wastes, there's a lot of ideas on the drawing board, there's a lot of energy, a lot of enthusiasm, a lot of innovation coming, and we'd like the Department to revisit the ideas of flexibility here to give haulers and waste companies opportunities to manage these materials differently, fully grounded in a benchmark life cycle analysis to make sure the kinds of changes that we want to bring in or want to test in pilot actually do move the needle and improve the environmental quality through the life cycle analysis benchmarking.

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

We have formal written comments for the record to be supplemented by these oral comments. Thank you for the opportunity to testify.

MS. LIGUORI: I would now like to call Justin Wood from the New York Lawyers for Public Interest.

MR. WOOD: Hello and thank you to the Department of Sanitation for holding this hearing and for proposing these important rules, and for the opportunity to testify today. My name is Justin Wood. I'm an Organizer with the New York Lawyers for the Public Interest. I also represent the Transform Don't Trash New York City coalition, and I'm the lead researcher on the coalition report we released this morning, examining how small businesses fair under New York City's current commercial waste system. Both New York lawyers and Transform Don't Trash strongly support the adoption of the proposed source separation rules as an important step towards improving our lagging commercial

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

recycling rate, which in the City's last comprehensive commercial waste study was only about 25 percent, far behind leading American cities and far behind what we could be doing with our massive commercial waste stream.

For our research, members of our coalition along with assistance from the Manhattan Borough of President's Office and the Manhattan Solid Waste Advisory Board interviewed and surveyed about 400 small business owners about their experiences with the current commercial waste industry. Our survey and interviews found that current recycling rules are badly in need of reform. About 75 percent of small business owners agree that the City should require private waste haulers to recycle more materials than they currently do.

We believe that these proposed rules which create a uniform set of requirements designating metal, glass, plastic, and paper as recyclable materials will provide a much needed clarity about source

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

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2 separation requirements and greater  
3 consistency between the residential and  
4 commercial waste systems. The new rules  
5 also clarify that it's unlawful for private  
6 haulers to commingle putrescible solid  
7 waste with recyclable materials.

8 Currently, many business are instructed by  
9 their private haulers to source separate  
10 only the most profitable materials like  
11 cardboard and to dispose of other  
12 recyclable items in black bags along with  
13 putrescible waste. Several of the business  
14 owners we talked to also directly observed  
15 their haulers throwing source separated  
16 recyclables into the same truck as black  
17 bag waste, causing many of them to question  
18 whether source separation is really worth  
19 the effort.

20 So we believe that in addition to  
21 increased scrutiny of what happens to  
22 commercial recyclables after they leave the  
23 curbside, the City is going to need to more  
24 closely monitor the recycling facilities  
25 and transfer stations that process this

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

waste to ensure that recyclables are not being landfilled or incinerated post collection.

We also believe that these rules are a necessary first step that the City is going to need to implement additional reforms to increase the commercial recycling rate while protecting small businesses. First, we anticipate that private haulers are going to use these new rules as a justification for increasing prices, in fact, I think we just heard that from Mr. Changaris, particularly for small business customers that lack market power. A 2008 PricewaterhouseCooper study done for the City's Economic Development Corporation surveyed 4,000 businesses and found that fully 68 percent of them did not have a written contract with their hauler, or did not know whether they did. Our survey found that it was a similar 61 percent that did not have a written contract. This leaves most small businesses vulnerable to sudden price increases from their hauler.

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

Both PricewaterhouseCooper and our survey found that almost all businesses pay a flat monthly fee to their hauler, regardless of how much waste they generate and do not receive waste surveys.

Functionally, this places them beyond the protections of the City's rate cap and leaves them open to substantial price hikes. In fact, PricewaterhouseCooper also found that most businesses are not even aware of the rate cap.

Second, these proposed rules do not designate food waste as a recyclable material, although it comprises almost a third of the commercial waste stream and is a significant source of greenhouse gas emissions when landfilled. So we're eager to see that expansion of organics recycling and for these new rules to cover that, for small businesses as well.

To address these and other problems with NYC's commercial waste system, we support the adoption of an exclusion zone collection system. Other cities such as

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

San Francisco and Seattle have used similar approaches to ensure that businesses receive free or heavily discounted collection of source separated materials and organic waste, which has helped them to boost commercial recycling rates to among the highest in the nation. Under such a system, the City can pull the collective purchasing power of small businesses to negotiate fair and stable collection prices with waste haulers. Los Angeles is now implementing a similar system in which waste haulers will compete to serve geographic commercial zones, but while always in business customers stand to benefit from the greater efficiency and economy scale this system will create. Businesses can recycle far more materials at stable affordable prices while haulers will be able to make the investments in infrastructure in facilities needed to meet rigorous verifiable diversion rates.

Again, we want to thank the  
Department for proposing these rules and

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

thank you for the opportunity to testify.

MS. LIGUORI: I would now like to call Thomas Ferrugia from The Broadway League.

MR. FERRUGIA: Good morning. I am Thomas Ferrugia. I am the Director of Government Relations for The Broadway League.

The Broadway League has been the principal trade association of the national commercial Broadway theatre industry for more than 80 years. We represent more than 700 members nationwide, including the 40 theatres in Times Square that constitute Broadway. We thank the Department of Sanitation for allowing us an opportunity to remark on the rules being proposed today.

The Broadway community has always been on the forefront of social issues, including doing everything within our purview to reduce the environmental impact of our facilities. For example, many theatres have been retrofitted with thermal

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

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2 performance windows, reducing heat loss in  
3 the winter and cool air loss in the summer.  
4 Many have installed water filtration  
5 systems for backstage use to reduce plastic  
6 waste and the gasoline consumption of the  
7 delivery trucks. Our paper hand-towels are  
8 green seal approved and made from recycled  
9 paper. With assistance from Con-Edison, we  
10 have re-lamped our theatres with energy  
11 efficient light bulbs and the overall  
12 consumption of natural resources are  
13 constantly being monitored to see how we  
14 conserve even more energy, water, and fuel.

15           With respect to recycling, all  
16 theatres have reprocessing programs. After  
17 collection, most waste is separated at our  
18 carting company's plant for recycling. For  
19 backstage areas, recycling bins for paper,  
20 and bottles, and separate bins for other  
21 waste, aid in this process. For the public  
22 areas, used Playbills are collected and  
23 recycled. We have found that these  
24 measures not only help the environment, but  
25 often lead to significant cost savings. We

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

continue to strive for new ways to conserve, reuse and recycle in all areas of our operations.

While we applaud this agency for its efforts to standardize the method that private industries undertake -- sorry, the method that private industries undertake to fulfill the City's mandate on recycling, our venues may simply be incapable of compliance with some of the proposed rules. In many instances, theatre owners would be required to station a second set of large collection bins behind or outside of each venue. At present, there is scarcely sufficient room for one set. As Fire Code restrictions mandate routes for emergency egress, in many instances there is simply insufficient space for us to accommodate additional collection bins while simultaneously enabling compliance with safety regulations. Further, the proposed recycling rules will require venue staff to separate recyclables from other trash in-house, however, our theatres do not have

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

the personnel or capacity to do so.

Please note that all Broadway theatres have landmark status. Owners are therefore prohibited from making alterations that would be necessary to accommodate extra storage space.

Therefore, due to the close proximity of the theatres to one another, it is unlikely owners would be able to locate sufficient space even if they could legally alter the properties. Accordingly, we respectfully request that the rules, while effectively streamlining the recycling process and increasing efficiencies wherever possible, are amended to take into consideration the spatial and practical limitations of our facilities.

On behalf of the Broadway theatre community, the League supports any effort by the City to improve the environment. We would therefore be delighted to collaborate with DSNY in an effort to create rules that advance its goals while accounting for the real-world affects they will have on

Proposed Recycling Rules  
October 22, 2015

28

1 Proceedings

2 building owners, as well as their ability,  
3 or inability, to comply.

4 And I've also provided some  
5 information about Broadway, its economic  
6 impact, its employment, things of that  
7 nature. Thank you very much.

8 MS. LIGUORI: I'd like to now call  
9 Eric Goldstein from the NRDC.

10 MR. GOLDSTEIN: Good morning. My  
11 name is Eric Goldstein. I'm a lawyer with  
12 the Natural Resources Defense Council,  
13 which is a national non-profit legal and  
14 scientific organization. NRDC has been  
15 active on a wide range of environmental and  
16 public health issues including solid waste  
17 in New York City for over 40 years.

18 NRDC welcomes this new proposal,  
19 which has the potential to be the most  
20 significant improvement to the recycling  
21 and waste handling collection system by New  
22 York City businesses in years. Even though  
23 commercial establishments have been  
24 required to recycle as far back as 1992,  
25 commercial recycling has been a long time

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

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2 weak spot in the City's solid waste  
3 program. Lack of clarity of existing  
4 requirements for recycling, shortcomings  
5 and enforcement, and an overall lack of  
6 interest by many commercial establishments  
7 have all contributed to this sorry  
8 situation. NRDC supported Local Law 32 of  
9 2010 which was designed in part to develop  
10 remedies to the widespread non-compliance  
11 with even basic commercial recycling  
12 requirements, and as I indicated earlier,  
13 we're pleased to see this proposal which  
14 has goals of increasing recycling and  
15 making a more rational collection system.

16 Overall, the proposed rules should  
17 help to rationalize the current commercial  
18 recycling program, if we can even call the  
19 current program a program. Specifically,  
20 we welcome the new proposal's initiative to  
21 apply the same recycling rules to all  
22 businesses. This alone would especially  
23 end much confusion. To that end, the new  
24 rules would require the separation for  
25 recycling of metals, glass, plastic and

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

paper, as well as textiles, yard waste, and construction and demolition debris where applicable. These new rules are clear and simple and we say bravo.

We're also pleased to see the new rules prohibit the commingling of designated recyclables and non-recyclable solid waste. The idea of commingling recyclables with non-recyclable trash is one of the worst concepts ever proposed in the solid waste field. It leads to greater contamination of recyclables, defeating the very purpose of recycling which is to rescue valuable commodities from landfills or incinerators and reintroduce them into the stream of commerce.

Another disadvantage of commingling is that it is inconsistent with the City's residential recycling program and therefore would be very confusing to the public. These proposed regulations widely do not allow the destructive waste practice of commingling to continue and again, we applaud that move.

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

A potential advance in the proposed rules is the provision line for single stream recycling collection. This approach could simplify the collection process and perhaps even increase recycling levels to be sure that the implementation of single stream commercial recycling needs to be carefully monitored to ensure that this new system is not having an adverse impact on the value of sorted recycles and the actual level of recycling. And we comment on that more in our written submission.

We note also that detailed requirements for the collection of food waste organics are not included in this proposal. We believe the reason for this omission is simply that the expansion of the commercial organics collection program is proceeding under another track -- down another track, pursuant to the 2013 Commercial Organics Composting Statute passed by the City Council and signed by Mayor Bloomberg. And we recognize that the new regulations do provide a placeholder

**Proposed Recycling Rules**  
**October 22, 2015**

Proceedings

1  
2 for adding organics as part of this new  
3 regulatory scheme. There is no more  
4 important step the City can take than to  
5 continue to expand commercial collection of  
6 organics as a solution to the waste crisis  
7 facing the City, and we look forward to the  
8 ultimate inclusion of the organics portion  
9 of the waste stream as a designated  
10 recyclable for all commercial waste  
11 generators in the years to come. We  
12 believe the City has been moving down the  
13 right path with its continued expansion of  
14 the Commercial Organics Collection Program.

15 Of course, any regulatory program is  
16 only as effective as the enforcement action  
17 that supports it, and this is especially  
18 true in the area of solid waste where  
19 enforcement has traditionally lagged both  
20 in New York City and around the country.  
21 Our biggest fear is that these new  
22 regulations won't be effectively enforced  
23 and that the intentions set forth in the  
24 preamble won't be fully realized. We're  
25 concerned that the new proposal's effort to

Proposed Recycling Rules  
October 22, 2015

Proceedings

1  
2 ensure compliance by haulers will not be  
3 accomplished without effective enforcement.

4 We're also concerned about actual  
5 recycling compliance at the end of the line  
6 at solid waste recycling facilities. This  
7 has historically been the domain of the  
8 State and State regulations do not  
9 currently ensure that DEC permitted  
10 recycling facilities are actually  
11 recycling. We urge the City to explore  
12 whether it has a jurisdiction and can move  
13 forward down the line to permit recycling  
14 facilities directly and add additional  
15 requirements to ensure that the goals that  
16 it's describing today are actually  
17 achieved.

18 Information gathering is another  
19 important worry of ours. Will haulers  
20 demonstrate that they have the capacity to  
21 process single stream recycling waste?  
22 This and other questions will only be  
23 answered if we are successful -- if the  
24 City is successful in securing information  
25 from commercial haulers and other

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

commercial waste facilities. That has been a long term trouble spot for the City and we're going to be watching that very carefully.

Finally, I'm also testifying today on behalf of the Transform Don't Trash New York City coalition. NRDC is a member of that coalition. Transform Don't Trash is dedicated to reforming New York City's commercial waste to reduce waste and pollution, increase recycling, foster clean and healthy communities for all New Yorkers, and create good local jobs. Like NRDC, Transform Don't Trash members believe that the proposed rules are a significant step in the right direction and we commend the Department for its leadership in expanding the City's commercial recycling effort.

TDT shares, however, the concern that the effectiveness of these rules in ensuring that glass, metals, plastic, and paper will be significantly limited by their inability to address what happens at

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

the end of the recycling chain. Even if businesses and haulers do their part, lacks State regulation of recycling facilities is a big problem that can undermine the Department's goals in adopting these rules.

TDT also shares our sense of urgency about the need to comprehensively recycle New York City's organic material, hundreds of thousands of tons of which are unnecessarily landfilled each year and where it decomposes and releases methane and a potent greenhouse gas.

Finally, as you probably know, TDT is advocating for the City to adopt an exclusive zone system for handling commercial waste. We believe this proven approach will ensure that effective recycling of metal, glass, plastic, and paper takes place while also allowing for expansion of organics. Under such a system, the City wouldn't create geographic zones in which haulers bid for the exclusive right to collect commercial waste. Through contracts between the City

**Proposed Recycling Rules**  
**October 22, 2015**

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Proceedings

and success of bidders, this approach would maximize efficiency for haulers while pooling the purchasing power of businesses including small businesses. There would be widespread benefits that would extend throughout the City and our hope is that today's regulatory proposal is the start of further reforms to the commercial waste stream, which has unfortunately over the last 25 years failed to deliver on its promise of environmentally sound waste handling that is protective of New York City and all of its residents. Thank you for your attention.

MS. LIGUORI: Does anyone else wish to speak? If so, please sign in in the back. We will hold the record open until noon. Thank you.

(Whereupon, a recess is taken.)

MS. LIGUORI: It is now noon. We are now calling the hearing closed. Thank you all for coming and testifying.

(Time noted: 12:00 p.m.)



**Proposed Recycling Rules  
October 22, 2015**

<b>A</b>		
a.m (1) 2:2	approach (3) 31:4 35:18 36:2	buildings (1) 10:24
abilities (1) 11:13	approaches (1) 23:3	bulbs (1) 25:11
ability (2) 28:2 37:13	approved (1) 25:8	bunch (1) 13:22
able (3) 16:13 23:21 27:10	area (3) 16:6 17:3 32:18	Bureau (2) 2:4 4:6
absorb (1) 11:16	areas (3) 25:19,22 26:3	business (9) 5:22 6:6,10 19:13,18 20:8,13 21:15 23:16
accepting (1) 8:17	arrange (1) 7:16	businesses (25) 5:2,17,18,20,23 5:25 6:20 10:2,17 12:16 18:19 21:10,18,24 22:3,11,21 23:3,10 23:19 28:22 29:22 35:3 36:4,5
accommodate (3) 12:18 26:19 27:7	arrangement (1) 13:5	
accomplished (1) 33:3	assistance (5) 11:21 12:13 14:2 19:9 25:9	<b>C</b>
accounting (1) 27:24	Associate (2) 2:4 4:5	C (2) 37:2,2
accurately (1) 9:12	association (5) 9:15,23,23 10:6 24:11	call (9) 9:13 13:16 14:13,15 15:20 18:7 24:4 28:8 29:18
achieved (2) 17:7 33:17	attending (1) 4:8	calling (3) 9:6 13:17 36:22
Act (1) 4:12	attention (1) 36:15	cans (1) 12:6
action (2) 32:16 37:15	AUDITORIUM (1) 1:13	cap (7) 13:2,7,10,10,13 22:8,12
active (2) 16:3 28:15	available (1) 8:21	capacities (1) 11:12
actively (1) 15:11	aware (1) 22:12	capacity (2) 27:2 33:20
actual (3) 14:12 31:11 33:4	<b>B</b>	cardboard (2) 5:12 20:11
adapt (1) 8:10	back (3) 12:11 28:24 36:18	carefully (3) 9:2 31:9 34:5
add (2) 14:8 33:14	backstage (2) 25:5,19	cart (1) 13:21
adding (1) 32:2	badly (1) 19:16	carter (9) 1:6 4:17 6:10 7:7,9,11,12 7:17 10:22
addition (3) 5:25 6:25 20:20	bag (1) 20:17	carters (4) 5:8 6:25 8:10 13:21
additional (4) 13:19 21:7 26:20 33:14	bags (3) 6:5 7:23 20:12	carting (1) 25:18
address (2) 22:22 34:25	based (1) 12:4	Cassella (3) 1:23 37:7,22
adjustments (1) 13:12	basic (1) 29:11	cause (1) 14:19
Administrative (3) 4:12 5:7 8:3	behalf (2) 27:19 34:7	causing (1) 20:17
adopt (2) 14:7 35:15	believe (12) 10:16 12:23 13:4,7 15:19 19:21 20:20 21:5 31:17 32:12 34:15 35:17	center (1) 14:6
adopting (1) 35:6	benchmark (1) 17:20	certain (3) 5:18 7:19 14:20
adoption (3) 15:5 18:23 22:24	benchmarking (1) 17:25	certainly (3) 11:15 13:10,11
advance (2) 27:24 31:2	beneficial (1) 16:20	certify (2) 37:9,14
adverse (1) 31:10	benefit (1) 23:17	chain (2) 11:2 35:2
Advisory (1) 19:11	benefits (1) 36:6	Changaris (5) 3:3 9:13,17,20 21:14
advocating (1) 35:15	best (3) 10:7 17:7 37:13	changed (1) 12:14
Affairs (2) 2:4 4:6	beyond (1) 22:7	changes (3) 10:16 17:10,21
affiliation (1) 9:10	BIC (1) 13:2	changing (1) 12:17
affordable (1) 23:20	bid (1) 35:23	Chapter (4) 3:3 9:14,21 10:4
agency (1) 26:5	bidders (1) 36:2	cities (3) 16:2 19:5 22:25
aggregation (1) 14:10	big (2) 10:14 35:5	citizens (1) 10:2
agree (1) 19:18	biggest (1) 32:21	City (40) 2:4 4:7,12,19,21 5:2,10 8:3 9:14,21 10:3,4 12:25 15:20 16:2,6,13,25 18:16 19:18 20:23 21:6 23:9 27:21 28:17,22 31:23 32:4,7,12,20 33:11,24 34:3,8 35:15,22,25 36:7,14
aid (1) 25:21	bins (5) 6:5 25:19,20 26:14,20	City's (12) 4:22 5:14 18:20 19:2 21:17 22:8 26:9 29:2 30:19 34:10 34:19 35:9
air (1) 25:3	black (2) 20:12,16	clarify (1) 20:5
allow (3) 6:25 8:9 30:23	blood (1) 37:15	clarity (2) 19:25 29:3
allowing (3) 6:2 24:17 35:20	Bloomberg (1) 31:24	clean (1) 34:12
alter (1) 27:11	board (2) 17:13 19:11	cleaning (1) 12:10
alterations (1) 27:6	boards (1) 4:23	clear (1) 30:4
amended (2) 5:6 27:16	boost (1) 23:7	
American (1) 19:5	Borough (1) 19:10	
amount (3) 10:11,12 14:21	bottle (1) 14:8	
analysis (2) 17:20,25	bottles (2) 12:6 25:20	
Angeles (1) 23:12	bravo (1) 30:5	
answered (1) 33:23	bring (1) 17:21	
anticipate (1) 21:10	Broadway (10) 3:6 24:4,8,10,12,16 24:20 27:3,19 28:5	
applaud (2) 26:5 30:25	building (2) 12:9 28:2	
applicable (1) 30:4		
apply (1) 29:21		
applying (1) 5:22		

**Proposed Recycling Rules  
October 22, 2015**

clearly (1) 9:10  
 close (1) 27:8  
 closed (1) 36:22  
 closely (1) 20:24  
 co-collection (3) 6:6 7:5,13  
 coalition (5) 18:17,18 19:9 34:8,9  
 Code (3) 5:8 8:3 26:16  
 collaborate (1) 27:22  
 collect (5) 5:8 9:24 14:4,15 35:24  
 collected (4) 7:7,10 12:25 25:22  
 collection (24) 1:6 4:17 6:2,21 7:4  
 7:13,17 12:5 14:9 21:4 22:25  
 23:5,11 25:17 26:14,20 28:21  
 29:15 31:4,5,15,19 32:5,14  
 collective (1) 23:9  
 come (1) 32:11  
 coming (2) 17:15 36:23  
 commend (1) 34:17  
 comment (1) 31:12  
 comments (10) 4:14 8:14,18,20,22  
 9:3,4,19 18:2,4  
 commerce (1) 30:17  
 commercial (36) 5:4,9,14 6:13  
 13:5 18:21,25 19:3,6,14 20:4,22  
 21:8 22:16,23 23:7,15 24:12  
 28:23,25 29:6,11,17 31:8,19,22  
 32:5,10,14 33:25 34:2,11,19  
 35:17,24 36:9  
 commingle (1) 20:6  
 commingling (5) 6:23 30:7,9,18,24  
 commodities (2) 16:15 30:15  
 commodity (1) 16:17  
 communities (1) 34:13  
 community (3) 4:22 24:20 27:20  
 companies (3) 9:24 10:25 17:18  
 company's (1) 25:18  
 compartment (1) 6:12  
 compete (1) 23:14  
 complete (1) 16:11  
 compliance (5) 8:2 26:11,21 33:2  
 33:5  
 comply (4) 11:20,24 14:20 28:3  
 complying (1) 15:4  
 Composting (1) 31:22  
 comprehensive (1) 19:3  
 comprehensively (1) 35:8  
 comprises (1) 22:15  
 Con-Edison (1) 25:9  
 concepts (1) 30:11  
 concern (1) 34:21  
 concerned (2) 32:25 33:4  
 concerning (1) 8:14  
 concerns (1) 11:6  
 conducting (1) 4:10  
 confusing (1) 30:21  
 confusion (1) 29:23  
 conserve (2) 25:14 26:3

consider (1) 9:3  
 consideration (2) 15:8 27:16  
 consistency (1) 20:3  
 constantly (1) 25:13  
 constitute (1) 24:15  
 construction (1) 30:3  
 consumer (2) 10:21 13:2  
 consumption (2) 25:6,12  
 contamination (1) 30:13  
 contemplating (1) 12:19  
 continue (3) 26:2 30:24 32:5  
 continued (1) 32:13  
 contract (2) 21:20,23  
 contracts (1) 35:25  
 contributed (1) 29:7  
 CONVENED (1) 2:2  
 convenient (1) 10:19  
 cool (1) 25:3  
 copies (1) 4:20  
 copy (1) 8:22  
 Corporation (1) 21:17  
 cost (1) 25:25  
 Council (3) 3:7 28:12 31:23  
 Counsel (2) 2:4 4:5  
 country (1) 32:20  
 COUNTY (1) 37:5  
 course (1) 32:15  
 court (2) 8:11 9:11  
 cover (1) 22:20  
 crafting (1) 15:24  
 create (6) 15:20 19:22 23:18 27:23  
 34:14 35:22  
 crews (1) 10:23  
 crisis (1) 32:6  
 curbside (1) 20:23  
 current (7) 5:14 14:6 18:20 19:14  
 19:16 29:17,19  
 currently (6) 5:18 11:23 12:24  
 19:20 20:8 33:9  
 customer (1) 15:13  
 customers (10) 11:23,23 12:2,3  
 13:6 14:16 15:3,13 21:15 23:16  
 cycle (2) 17:20,25

**D**

day (2) 11:10 37:19  
 deadline (1) 8:19  
 debris (1) 30:3  
 DEC (1) 33:9  
 decomposes (1) 35:12  
 decrease (1) 10:11  
 dedicated (1) 34:10  
 defeating (1) 30:13  
 Defense (2) 3:7 28:12  
 delighted (1) 27:22  
 deliver (1) 36:11  
 delivery (1) 25:7

demolition (1) 30:3  
 demonstrate (1) 33:20  
 Department (16) 1:4 2:4 4:7,10,18  
 4:20 5:4 8:5,7,21 9:2 17:16 18:10  
 23:25 24:16 34:18  
 Department's (5) 4:8,15,25 7:24  
 35:6  
 describing (1) 33:16  
 designate (2) 6:17 22:14  
 designated (9) 5:11 6:3,7,9,24 7:2  
 7:9 30:8 32:9  
 designating (1) 19:23  
 designed (1) 29:9  
 destructive (1) 30:23  
 detailed (1) 31:14  
 detracts (1) 15:6  
 develop (1) 29:9  
 Development (1) 21:17  
 di (1) 14:13  
 different (1) 5:19  
 differently (1) 17:19  
 difficult (3) 14:17 16:17,21  
 difficulty (1) 15:3  
 direction (1) 34:17  
 directly (2) 20:14 33:14  
 Director (1) 24:7  
 disadvantage (1) 30:18  
 discounted (1) 23:4  
 discussion (1) 14:24  
 disposable (1) 16:19  
 disposal (2) 10:12 11:17  
 dispose (1) 20:11  
 distinction (1) 5:21  
 diversion (2) 6:14 23:23  
 divert (3) 10:8 16:19 17:6  
 diverted (2) 13:20,24  
 dock (2) 12:12 14:3  
 doing (4) 15:7 16:7 19:6 24:22  
 domain (1) 33:7  
 drawing (1) 17:13  
 DSNY (1) 27:23  
 due (1) 27:8

**E**

E (2) 37:2,2  
 eager (1) 22:18  
 earlier (1) 29:12  
 easier (3) 5:17,25 6:13  
 economic (2) 21:17 28:5  
 economy (2) 16:12 23:18  
 education (1) 8:8  
 effective (4) 8:4 32:16 33:3 35:18  
 effectively (2) 27:13 32:22  
 effectiveness (1) 34:22  
 efficiencies (1) 27:15  
 efficiency (2) 23:17 36:3  
 efficient (1) 25:11

**Proposed Recycling Rules  
October 22, 2015**

**efficiently (1)** 13:14  
**effort (5)** 20:19 27:20,23 32:25  
 34:20  
**efforts (2)** 10:8 26:6  
**egress (1)** 26:18  
**elected (1)** 4:21  
**elements (1)** 11:24  
**Eliminating (1)** 5:21  
**emergency (1)** 26:17  
**emissions (1)** 22:18  
**employees (1)** 12:9  
**employment (1)** 28:6  
**enabling (1)** 26:21  
**energy (3)** 17:14 25:10,14  
**enforced (1)** 32:22  
**enforcement (6)** 7:25 8:6 29:5  
 32:16,19 33:3  
**engage (1)** 8:8  
**ensure (7)** 21:2 23:3 31:9 33:2,9  
 33:15 35:18  
**ensuring (1)** 34:23  
**enthusiasm (1)** 17:14  
**entities (2)** 1:5 4:16  
**entrance (1)** 8:15  
**environment (3)** 13:9 25:24 27:21  
**environmental (3)** 17:24 24:23  
 28:15  
**environmentally (1)** 36:12  
**Eric (3)** 3:7 28:9,11  
**especially (2)** 29:22 32:17  
**establish (1)** 14:24  
**establishments (2)** 28:23 29:6  
**examining (1)** 18:19  
**example (2)** 12:2 24:24  
**exclusion (1)** 22:24  
**exclusive (2)** 35:16,24  
**existing (2)** 15:6 29:3  
**expand (1)** 32:5  
**expanding (1)** 34:19  
**expansion (4)** 22:19 31:18 32:13  
 35:21  
**experiences (1)** 19:13  
**expertise (1)** 11:9  
**explore (1)** 33:11  
**extend (1)** 36:6  
**extensive (1)** 8:8  
**extra (1)** 27:7

**F**

**F (1)** 37:2  
**facilitate (1)** 5:23  
**facilities (13)** 7:22 11:14 13:18,21  
 20:24 23:22 24:24 27:18 33:6,10  
 33:14 34:2 35:4  
**facility (1)** 10:22  
**facing (1)** 32:7  
**fact (2)** 21:13 22:10

**fail (1)** 14:20  
**failed (1)** 36:11  
**fair (2)** 18:20 23:11  
**far (4)** 19:4,5 23:19 28:24  
**fear (1)** 32:21  
**fee (1)** 22:4  
**Ferrugia (4)** 3:6 24:4,6,7  
**fiber (2)** 12:4 14:7  
**field (1)** 30:12  
**fifty-nine (1)** 4:22  
**filtration (1)** 25:4  
**Finally (2)** 34:6 35:14  
**financial (1)** 11:21  
**Fire (1)** 26:16  
**first (6)** 10:4,13 11:8,18 21:6,10  
**flat (1)** 22:4  
**flexibility (1)** 17:17  
**FLOOR (1)** 1:13  
**focus (1)** 16:7  
**follow (1)** 5:17  
**food (2)** 22:14 31:15  
**forefront (1)** 24:21  
**formal (1)** 18:2  
**forth (3)** 7:18,19 32:23  
**forward (2)** 32:7 33:13  
**foster (1)** 34:12  
**found (6)** 19:15 21:18,22 22:3,11  
 25:23  
**framework (1)** 17:6  
**Francisco (1)** 23:2  
**free (2)** 13:4 23:4  
**fuel (1)** 25:14  
**fulfill (1)** 26:9  
**fully (3)** 17:19 21:19 32:24  
**Functionally (1)** 22:7  
**further (3)** 26:22 36:9 37:14

**G**

**gas (2)** 22:17 35:13  
**gasoline (1)** 25:6  
**gathering (1)** 33:18  
**generate (2)** 6:21 22:5  
**generated (1)** 9:25  
**generating (1)** 11:3  
**generator (3)** 7:6 10:20 15:9  
**generators (8)** 5:9 8:9 11:11,19  
 13:16,25 14:20 32:11  
**geographic (2)** 23:15 35:22  
**give (1)** 17:17  
**given (1)** 15:8  
**glass (10)** 5:12 6:4,8,19 16:16,16  
 19:23 29:25 34:23 35:19  
**go (3)** 11:7,18 13:11  
**goals (4)** 27:24 29:14 33:15 35:6  
**going (17)** 4:3 10:12 12:5,8,12,17  
 12:19 13:22,25 14:5,7 16:15  
 17:11 20:23 21:7,11 34:4

**Goldstein (4)** 3:7 28:9,10,11  
**good (10)** 4:2,3 9:17 11:4 15:7  
 16:12 17:5 24:6 28:10 34:14  
**governing (2)** 1:5 4:15  
**Government (1)** 24:8  
**greater (4)** 5:23 20:2 23:17 30:12  
**green (1)** 25:8  
**greenhouse (2)** 22:17 35:13  
**grounded (1)** 17:19

**H**

**hand (1)** 37:19  
**hand-towels (1)** 25:7  
**handling (3)** 28:21 35:16 36:13  
**happens (2)** 20:21 34:25  
**hard (1)** 16:23  
**hauler (3)** 21:20,25 22:4  
**haulers (16)** 15:16 17:17 19:19  
 20:6,9,15 21:11 23:12,14,20 33:2  
 33:19,25 35:3,23 36:3  
**hauling (1)** 6:12  
**health (1)** 28:16  
**healthy (1)** 34:13  
**heard (1)** 21:13  
**hearing (10)** 1:2 2:2 4:8,11,13 8:12  
 8:23 9:4 18:11 36:22  
**heat (1)** 25:2  
**heavily (1)** 23:4  
**Hello (1)** 18:9  
**help (6)** 6:13 11:19 14:5 16:14  
 25:24 29:17  
**helped (1)** 23:6  
**helpful (1)** 17:2  
**hereunto (1)** 37:18  
**Hi (1)** 4:2  
**highest (1)** 23:8  
**hikes (1)** 22:10  
**hire (2)** 10:7 17:7  
**hiring (1)** 10:6  
**historically (1)** 33:7  
**hit (1)** 15:25  
**hold (1)** 36:18  
**holding (1)** 18:10  
**hope (1)** 36:7  
**hundreds (1)** 35:9  
**hurts (1)** 15:6

**I**

**idea (1)** 30:9  
**ideas (2)** 17:12,16  
**identifying (1)** 7:8  
**impact (3)** 24:23 28:6 31:10  
**implement (1)** 21:7  
**implementation (2)** 7:14 31:7  
**implemented (1)** 11:7  
**implementing (2)** 14:17 23:13  
**important (5)** 11:22 18:12,24 32:4

**Proposed Recycling Rules  
October 22, 2015**

<p>33:19  <b>improve (2)</b> 17:23 27:21  <b>improvement (1)</b> 28:20  <b>improving (1)</b> 18:25  <b>in-house (1)</b> 26:25  <b>inability (2)</b> 28:3 34:25  <b>incapable (1)</b> 26:10  <b>incentives (2)</b> 13:16,17  <b>incinerated (1)</b> 21:3  <b>incinerators (1)</b> 30:16  <b>include (1)</b> 7:25  <b>included (1)</b> 31:16  <b>including (6)</b> 5:11 6:18 24:14,22              28:16 36:5  <b>inclusion (1)</b> 32:8  <b>inconsistent (1)</b> 30:19  <b>increase (4)</b> 6:14 21:8 31:6 34:12  <b>increased (1)</b> 20:21  <b>increases (1)</b> 21:25  <b>increasing (3)</b> 21:12 27:15 29:14  <b>indicated (1)</b> 29:12  <b>industries (2)</b> 26:7,8  <b>industry (4)</b> 9:19 13:4 19:14 24:12  <b>information (3)</b> 28:5 33:18,24  <b>infrastructure (1)</b> 23:22  <b>initiative (1)</b> 29:20  <b>innovation (2)</b> 17:10,15  <b>inside (1)</b> 17:5  <b>installed (1)</b> 25:4  <b>instances (2)</b> 26:12,18  <b>instructed (1)</b> 20:8  <b>insufficient (1)</b> 26:19  <b>integrate (1)</b> 12:5  <b>intentions (1)</b> 32:23  <b>interest (4)</b> 3:5 18:8,15 29:6  <b>interested (2)</b> 4:23 37:16  <b>interviewed (1)</b> 19:12  <b>interviews (1)</b> 19:15  <b>investments (1)</b> 23:21  <b>involved (5)</b> 10:20 11:2 13:23              15:23 17:3  <b>isolate (1)</b> 14:2  <b>issues (2)</b> 24:21 28:16  <b>items (2)</b> 6:20 20:12</p> <hr/> <p style="text-align: center;"><b>J</b></p> <p><b>janitorial (1)</b> 12:10  <b>Jennifer (3)</b> 1:23 37:7,22  <b>job (1)</b> 15:7  <b>jobs (1)</b> 34:14  <b>July (2)</b> 8:4,6  <b>jurisdiction (1)</b> 33:12  <b>justification (1)</b> 21:12  <b>Justin (3)</b> 3:5 18:7,13</p> <hr/> <p style="text-align: center;"><b>K</b></p> <p><b>kinds (1)</b> 17:21</p>	<p><b>know (2)</b> 21:21 35:14</p> <hr/> <p style="text-align: center;"><b>L</b></p> <p><b>lack (3)</b> 21:15 29:3,5  <b>lacks (1)</b> 35:3  <b>lagged (1)</b> 32:19  <b>lagging (1)</b> 18:25  <b>landfilled (3)</b> 21:3 22:18 35:11  <b>landfills (2)</b> 6:15 30:15  <b>landmark (1)</b> 27:4  <b>large (1)</b> 26:13  <b>lastly (1)</b> 7:24  <b>Law (2)</b> 5:6 29:8  <b>lawyer (1)</b> 28:11  <b>lawyers (4)</b> 3:5 18:7,14,22  <b>lead (2)</b> 18:17 25:25  <b>leader (1)</b> 16:18  <b>leadership (1)</b> 34:18  <b>leading (1)</b> 19:4  <b>leads (1)</b> 30:12  <b>League (5)</b> 3:6 24:5,9,10 27:20  <b>leave (1)</b> 20:22  <b>leaves (2)</b> 21:24 22:9  <b>legal (4)</b> 2:4 4:6 14:19 28:13  <b>legally (1)</b> 27:11  <b>legitimate (1)</b> 15:3  <b>lessees (1)</b> 7:16  <b>level (4)</b> 10:13 14:13,25 31:12  <b>levels (1)</b> 31:6  <b>life (2)</b> 17:20,24  <b>light (1)</b> 25:11  <b>Liguori (8)</b> 2:4 4:2,5 18:6 24:3 28:8              36:16,21  <b>limit (1)</b> 10:10  <b>limitations (1)</b> 27:17  <b>limited (2)</b> 6:18 34:24  <b>line (4)</b> 14:8 31:3 33:5,13  <b>list (1)</b> 6:19  <b>loading (1)</b> 14:3  <b>loads (1)</b> 15:15  <b>local (4)</b> 4:21 5:6 29:8 34:14  <b>locate (1)</b> 27:10  <b>long (2)</b> 28:25 34:3  <b>longing (1)</b> 17:8  <b>look (1)</b> 32:7  <b>loop (1)</b> 16:11  <b>Los (1)</b> 23:12  <b>loss (2)</b> 25:2,3  <b>lost (1)</b> 16:18  <b>lot (8)</b> 11:19 12:8,12 17:11,12,13              17:14,14</p> <hr/> <p style="text-align: center;"><b>M</b></p> <p><b>Madelynn (2)</b> 2:4 4:5  <b>mailed (1)</b> 4:20  <b>maintenance (1)</b> 12:9  <b>making (2)</b> 27:5 29:15</p>	<p><b>manage (9)</b> 6:14 9:24 10:23 11:10              13:13 16:17,21 17:12,18  <b>managed (1)</b> 13:20  <b>management (1)</b> 10:25  <b>Manager (1)</b> 9:21  <b>managing (2)</b> 11:3 14:7  <b>mandate (2)</b> 26:9,17  <b>Manhattan (2)</b> 19:10,11  <b>manufacturer (1)</b> 10:21  <b>market (5)</b> 13:4,14 16:10,23 21:15  <b>market-based (1)</b> 12:23  <b>marketplace (1)</b> 17:10  <b>markets (5)</b> 11:15 16:8,11,20,25  <b>marriage (1)</b> 37:16  <b>massive (1)</b> 19:6  <b>material (8)</b> 7:10 10:11,12 11:13              14:14,21 22:15 35:9  <b>materials (29)</b> 5:11,19 6:11,17,22              6:24 7:3,23 10:8,9 11:9,14,16              12:7 13:14,19,24 14:3,10 16:9,22              17:6,19 19:20,24 20:7,10 23:5,19  <b>matter (2)</b> 37:11,17  <b>maximize (1)</b> 36:3  <b>Mayor (1)</b> 31:24  <b>measures (1)</b> 25:24  <b>media (1)</b> 4:23  <b>meet (1)</b> 23:22  <b>member (1)</b> 34:8  <b>members (3)</b> 19:8 24:14 34:15  <b>mention (1)</b> 14:18  <b>metal (7)</b> 5:12 6:4,8,18 16:22 19:23              35:19  <b>metals (3)</b> 12:6 29:25 34:23  <b>methane (1)</b> 35:12  <b>method (2)</b> 26:6,8  <b>minimis (1)</b> 14:13  <b>monitor (1)</b> 20:24  <b>monitored (2)</b> 25:13 31:9  <b>monthly (1)</b> 22:4  <b>morning (8)</b> 4:2,4,9 9:7,17 18:19              24:6 28:10  <b>move (3)</b> 17:23 30:25 33:12  <b>moving (1)</b> 32:12</p> <hr/> <p style="text-align: center;"><b>N</b></p> <p><b>name (5)</b> 4:4 9:9,20 18:13 28:11  <b>nation (1)</b> 23:8  <b>national (7)</b> 3:3,7 9:15,22 10:5              24:11 28:13  <b>nationwide (1)</b> 24:14  <b>natural (2)</b> 25:12 28:12  <b>nature (1)</b> 28:7  <b>necessary (2)</b> 21:6 27:6  <b>need (9)</b> 11:19 12:5,12 13:25 14:5              19:16 20:23 21:7 35:8  <b>needed (2)</b> 19:25 23:22  <b>needle (1)</b> 17:23</p>
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**Proposed Recycling Rules  
October 22, 2015**

**needs (2)** 11:11 31:8  
**negotiate (1)** 23:11  
**net (1)** 7:15  
**new (44)** 1:14,14 2:4 3:5 4:6,21 5:2  
 5:9 8:2,10 9:14,21 10:4 12:18  
 16:3 18:7,14,16,20,21 20:4 21:11  
 22:20 26:2 28:17,18,21 29:20,23  
 30:4,6 31:9,25 32:2,20,21,25  
 34:7,10,13 35:9 36:13 37:4,8  
**night (1)** 10:23  
**non-compliance (1)** 29:10  
**non-profit (1)** 28:13  
**non-putrescible (1)** 7:21  
**non-recyclable (2)** 30:8,10  
**noon (2)** 36:19,21  
**Notary (1)** 37:7  
**note (3)** 12:22 27:3 31:14  
**noted (1)** 36:24  
**notice (1)** 7:15  
**NRDC (6)** 28:9,14,18 29:8 34:8,15  
**number (1)** 6:17  
**NYC (1)** 3:3  
**NYC's (1)** 22:23

**O**

**observed (1)** 20:14  
**occupants (1)** 7:19  
**October (2)** 1:11 37:19  
**Office (1)** 19:10  
**officials (1)** 4:22  
**omission (1)** 31:18  
**ongoing (2)** 15:21 16:3  
**open (2)** 22:9 36:18  
**operations (1)** 26:4  
**operators (2)** 7:20 10:22  
**opportunities (1)** 17:18  
**opportunity (6)** 9:18 15:20 18:4,12  
 24:2,17  
**oral (3)** 8:13,16 18:3  
**order (1)** 9:7  
**organic (2)** 23:6 35:9  
**organics (10)** 12:20 22:19 31:16  
 31:19,22 32:2,6,8,14 35:21  
**organization (1)** 28:14  
**Organizer (1)** 18:14  
**outcome (1)** 37:17  
**outreach (1)** 8:8  
**outside (1)** 26:14  
**overall (3)** 25:11 29:5,16  
**owners (8)** 7:15 19:13,18 20:14  
 26:12 27:4,10 28:2

**P**

**p.m (1)** 36:24  
**paper (11)** 5:12 6:4,9,19 19:24  
 25:7,9,19 30:2 34:24 35:20  
**part (3)** 29:9 32:2 35:3

**participation (1)** 5:24  
**particular (1)** 16:16  
**particularly (2)** 14:17 21:14  
**parties (2)** 4:23 37:15  
**passed (1)** 31:23  
**path (1)** 32:13  
**pay (1)** 22:3  
**penalized (1)** 15:16  
**penalties (1)** 14:19  
**people (4)** 12:10 13:22 16:14 17:2  
**percent (4)** 19:4,17 21:19,22  
**perform (1)** 15:13  
**performance (1)** 25:2  
**period (1)** 8:7  
**periodically (1)** 16:24  
**permit (1)** 33:13  
**permitted (1)** 33:9  
**personnel (1)** 27:2  
**persons-in-charge (1)** 7:16  
**pick (1)** 11:9  
**pick-up (1)** 7:2  
**piece (5)** 12:15,21 15:2,5,10  
**pilot (1)** 17:22  
**place (1)** 35:20  
**placed (1)** 6:5  
**placeholder (1)** 31:25  
**places (3)** 6:10 14:4 22:7  
**plant (1)** 25:18  
**plastic (9)** 5:12 6:4,8,19 19:23 25:5  
 29:25 34:23 35:19  
**plastics (1)** 16:22  
**Playbills (1)** 25:22  
**please (4)** 8:15 9:9 27:3 36:17  
**pleased (2)** 29:13 30:6  
**point (1)** 17:4  
**points (2)** 14:12 15:18  
**pollution (1)** 34:12  
**pooling (1)** 36:4  
**portion (1)** 32:8  
**possible (2)** 17:8 27:15  
**post (2)** 7:7 21:3  
**potent (1)** 35:13  
**potential (2)** 28:19 31:2  
**power (3)** 21:15 23:10 36:4  
**practical (2)** 11:5 27:17  
**practice (1)** 30:23  
**preamble (1)** 32:24  
**present (7)** 2:3,6 8:11,13,16 9:18  
 26:15  
**President's (1)** 19:10  
**pretty (1)** 12:4  
**prevents (1)** 17:9  
**price (2)** 21:25 22:9  
**prices (3)** 21:13 23:11,20  
**PricewaterhouseCooper (3)** 21:16  
 22:2,10  
**principal (1)** 24:11

**private (18)** 1:6 4:17 5:8 6:10,25  
 7:7,8,11,11,17 8:9 9:24 19:19  
 20:5,9 21:11 26:7,8  
**private-carter (1)** 6:21  
**probably (1)** 35:14  
**problem (1)** 35:5  
**problems (1)** 22:22  
**Procedure (1)** 4:12  
**procedures (1)** 12:14  
**proceeding (1)** 31:20  
**proceedings (35)** 4:1 5:1 6:1 7:1  
 8:1 9:1 10:1 11:1 12:1 13:1 14:1  
 15:1 16:1 17:1 18:1 19:1 20:1  
 21:1 22:1 23:1 24:1 25:1 26:1  
 27:1 28:1 29:1 30:1 31:1 32:1  
 33:1 34:1 35:1 36:1 37:10,12  
**process (8)** 11:14 15:22 16:5  
 20:25 25:21 27:14 31:5 33:21  
**product (1)** 10:21  
**profitable (1)** 20:10  
**program (10)** 3:4 15:7 29:3,18,19  
 29:19 30:20 31:19 32:14,15  
**programs (3)** 10:10 13:21 25:16  
**prohibit (2)** 6:23 30:7  
**prohibited (1)** 27:5  
**promise (1)** 36:12  
**promulgated (1)** 5:5  
**properly (1)** 15:14  
**properties (1)** 27:12  
**property (1)** 10:25  
**proposal (4)** 28:18 29:13 31:17  
 36:8  
**proposal's (2)** 29:20 32:25  
**proposed (24)** 1:4 3:2 4:15,18,24  
 5:13 6:16 7:25 8:14,18 9:19  
 11:24 15:24 18:23 19:21 22:13  
 24:18 26:11,22 29:16 30:11,22  
 31:2 34:16  
**proposing (2)** 18:11 23:25  
**protecting (1)** 21:9  
**protection (1)** 13:3  
**protections (1)** 22:8  
**protective (1)** 36:13  
**proven (1)** 35:17  
**provide (3)** 7:14 19:24 31:25  
**provided (1)** 28:4  
**providing (1)** 15:12  
**provision (1)** 31:3  
**proximity (1)** 27:8  
**public (10)** 1:2 2:7 3:5 4:14 18:8,15  
 25:21 28:16 30:21 37:7  
**publication (1)** 8:19  
**published (2)** 4:18,24  
**pull (1)** 23:9  
**pulse (1)** 16:14  
**purchasing (2)** 23:10 36:4  
**purpose (2)** 4:13 30:14

**Proposed Recycling Rules  
October 22, 2015**

<p><b>pursuant (2)</b> 5:5 31:21  <b>purview (1)</b> 24:23  <b>putrescible (3)</b> 7:21 20:6,13</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>quality (1)</b> 17:24  <b>question (1)</b> 20:17  <b>questions (1)</b> 33:22</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>R (1)</b> 37:2  <b>raise (1)</b> 12:22  <b>range (1)</b> 28:15  <b>rate (9)</b> 13:2,7,9,10,13 19:2 21:9 22:8,12  <b>rates (2)</b> 23:7,23  <b>rational (1)</b> 29:15  <b>rationalize (1)</b> 29:17  <b>re-lamped (1)</b> 25:10  <b>real-world (1)</b> 27:25  <b>realized (1)</b> 32:24  <b>really (2)</b> 11:19 20:18  <b>reason (1)</b> 31:17  <b>reasonable (1)</b> 14:24  <b>receive (7)</b> 1:6 4:13,17 6:20 7:23 22:6 23:4  <b>received (1)</b> 8:22  <b>receives (2)</b> 9:3,5  <b>recess (1)</b> 36:20  <b>recognize (1)</b> 31:24  <b>record (7)</b> 4:19 8:12 9:12 11:18 18:3 36:18 37:12  <b>recover (1)</b> 16:9  <b>recovery (2)</b> 11:13 16:16  <b>recyclable (15)</b> 5:11 6:4,7,17,22,24 7:3,9,23 14:21 19:24 20:7,12 22:14 32:10  <b>recyclables (19)</b> 6:6,15 7:4,6,14 9:25 10:18,24 11:3 12:24 14:14 15:15 20:16,22 21:2 26:24 30:8 30:10,13  <b>recycle (9)</b> 5:3,10,19 6:23 19:19 23:19 26:3 28:24 35:8  <b>recycled (2)</b> 25:8,23  <b>recycles (1)</b> 31:11  <b>recycling (62)</b> 1:5 3:4 4:16 5:5,14 5:24,24 6:3,13 7:5,13,18 9:15,22 10:5,10 12:3,3,18 13:8,20 14:6 16:4,8,25 19:2,16 20:24 21:9 22:19 23:7 25:15,18,19 26:9,23 27:14 28:20,25 29:4,11,14,18,21 29:25 30:14,20 31:4,6,8,12 33:5 33:6,10,11,13,21 34:12,19 35:2,4 35:19  <b>reduce (3)</b> 24:23 25:5 34:11  <b>reducing (1)</b> 25:2  <b>reform (1)</b> 19:17</p>	<p><b>reforming (1)</b> 34:10  <b>reforms (2)</b> 21:8 36:9  <b>regarding (1)</b> 9:19  <b>regardless (1)</b> 22:5  <b>register (1)</b> 15:25  <b>regular (1)</b> 16:7  <b>regularly (1)</b> 15:22  <b>regulation (7)</b> 10:14 11:6,25 13:3 14:12 15:14 35:4  <b>regulations (14)</b> 9:20 10:7 11:20 12:20 14:18,22 15:4,6,11 26:22 30:22 31:25 32:22 33:8  <b>regulatory (5)</b> 17:5,9 32:3,15 36:8  <b>reintroduce (1)</b> 30:16  <b>related (1)</b> 37:14  <b>Relations (1)</b> 24:8  <b>relationship (1)</b> 13:6  <b>released (1)</b> 18:18  <b>releases (1)</b> 35:12  <b>relief (1)</b> 13:12  <b>remark (1)</b> 24:18  <b>remedies (1)</b> 29:10  <b>report (1)</b> 18:18  <b>reported (2)</b> 1:22 37:10  <b>reporter (2)</b> 8:11 9:11  <b>reports (1)</b> 16:25  <b>represent (2)</b> 18:15 24:13  <b>reprocessing (1)</b> 25:16  <b>request (1)</b> 27:13  <b>require (4)</b> 7:6 19:19 26:23 29:24  <b>required (5)</b> 5:3,19 6:22 26:13 28:24  <b>requirements (13)</b> 1:5 4:11,16 5:15 7:15,18 8:10 19:22 20:2 29:4,12 31:15 33:15  <b>rescue (1)</b> 30:15  <b>research (1)</b> 19:8  <b>researcher (1)</b> 18:17  <b>residential (2)</b> 20:3 30:20  <b>residents (1)</b> 36:14  <b>resources (3)</b> 3:7 25:12 28:12  <b>respect (1)</b> 25:15  <b>respectfully (1)</b> 27:12  <b>respond (1)</b> 12:20  <b>responsibilities (1)</b> 7:20  <b>restrictions (1)</b> 26:17  <b>retrofitted (1)</b> 24:25  <b>reuse (2)</b> 10:10 26:3  <b>revise (1)</b> 5:13  <b>revisit (1)</b> 17:16  <b>RICHMOND (1)</b> 37:5  <b>right (3)</b> 32:13 34:17 35:24  <b>rigorous (1)</b> 23:23  <b>robust (1)</b> 16:11  <b>room (2)</b> 8:15 26:16  <b>routes (1)</b> 26:17  <b>routine (3)</b> 15:21 16:7,24</p>	<p><b>rule (2)</b> 3:2 8:14  <b>rules (39)</b> 1:4 4:15,18,21,24 5:5,13 5:14,22 6:16 7:25 8:3,18 15:24 15:25 18:12,24 19:16,21 20:4 21:5,12 22:13,20 23:25 24:18 26:11,23 27:13,23 29:16,21,24 30:4,7 31:3 34:16,22 35:6</p> <hr/> <p style="text-align: center;"><b>S</b></p> <hr/> <p><b>safety (1)</b> 26:22  <b>San (1)</b> 23:2  <b>Sanitation (4)</b> 2:4 4:7 18:10 24:17  <b>Sanitation's (2)</b> 1:4 5:4  <b>savings (1)</b> 25:25  <b>saying (1)</b> 11:18  <b>scale (1)</b> 23:18  <b>scarcely (1)</b> 26:15  <b>scheme (1)</b> 32:3  <b>scientific (1)</b> 28:14  <b>scrutiny (1)</b> 20:21  <b>seal (1)</b> 25:8  <b>Seattle (1)</b> 23:2  <b>second (3)</b> 10:15 22:13 26:13  <b>Section (1)</b> 5:7  <b>securing (1)</b> 33:24  <b>see (8)</b> 13:11,23 14:23 17:6 22:19 25:13 29:13 30:6  <b>select (1)</b> 10:9  <b>sense (1)</b> 35:7  <b>sensitive (3)</b> 11:11,12,15  <b>separate (4)</b> 7:2 20:9 25:20 26:24  <b>separated (6)</b> 5:10 6:9,11 20:15 23:5 25:17  <b>separation (4)</b> 18:24 20:2,18 29:24  <b>September (1)</b> 4:19  <b>serve (1)</b> 23:14  <b>services (2)</b> 12:11 15:12  <b>set (7)</b> 7:17,19 19:22 26:13,16 32:23 37:18  <b>shares (2)</b> 34:21 35:7  <b>shortcomings (1)</b> 29:4  <b>show (1)</b> 15:15  <b>sign (3)</b> 7:8 8:15 36:17  <b>signed (2)</b> 9:8 31:23  <b>significant (4)</b> 22:17 25:25 28:20 34:16  <b>significantly (2)</b> 6:14 34:24  <b>similar (3)</b> 21:22 23:2,13  <b>simple (1)</b> 30:5  <b>simplify (2)</b> 5:15 31:5  <b>simply (3)</b> 26:10,18 31:18  <b>simultaneously (1)</b> 26:21  <b>single (6)</b> 6:2 7:3,12 31:3,7 33:21  <b>situation (1)</b> 29:8  <b>slowed (1)</b> 16:12  <b>slowly (1)</b> 9:10  <b>small (9)</b> 18:19 19:12,17 21:9,14</p>
---	---	---

**Proposed Recycling Rules  
October 22, 2015**

<p>21:24 22:21 23:10 36:5  <b>social (1)</b> 24:21  <b>soft (1)</b> 16:23  <b>solid (12)</b> 6:24 7:21 15:21 16:4            19:11 20:6 28:16 29:2 30:9,12            32:18 33:6  <b>solution (1)</b> 32:6  <b>sorry (2)</b> 26:7 29:7  <b>sorted (1)</b> 31:11  <b>sound (1)</b> 36:12  <b>source (10)</b> 5:10 6:8,11 18:23            19:25 20:9,15,18 22:17 23:5  <b>space (3)</b> 26:19 27:7,11  <b>spatial (1)</b> 27:17  <b>speak (6)</b> 9:7,9,10 14:23 16:18            36:17  <b>SPEAKERS (1)</b> 3:2  <b>Specifically (2)</b> 6:16 29:19  <b>spot (2)</b> 29:2 34:3  <b>Square (1)</b> 24:15  <b>ss (1)</b> 37:4  <b>stable (2)</b> 23:11,20  <b>staff (1)</b> 26:23  <b>stakeholder (2)</b> 15:22 16:4  <b>stand (1)</b> 23:16  <b>standardize (1)</b> 26:6  <b>start (1)</b> 36:8  <b>started (1)</b> 4:3  <b>state (6)</b> 9:9 33:8,8 35:4 37:4,8  <b>statement (3)</b> 8:13,16 9:12  <b>station (1)</b> 26:13  <b>stations (2)</b> 7:22 20:25  <b>status (1)</b> 27:4  <b>Statute (1)</b> 31:22  <b>step (5)</b> 17:8 18:24 21:6 32:4 34:17  <b>Steve (3)</b> 3:3 9:13,20  <b>storage (1)</b> 27:7  <b>stream (12)</b> 6:2 7:4,12 14:22 19:7            22:16 30:17 31:4,8 32:9 33:21            36:10  <b>streamlining (1)</b> 27:14  <b>STREET (1)</b> 1:12  <b>strive (1)</b> 26:2  <b>strongly (1)</b> 18:22  <b>structure (1)</b> 17:9  <b>study (2)</b> 19:3 21:16  <b>submission (2)</b> 8:20 31:13  <b>submit (1)</b> 8:13  <b>substantial (1)</b> 22:9  <b>success (1)</b> 36:2  <b>successful (2)</b> 33:23,24  <b>sudden (1)</b> 21:25  <b>sufficient (2)</b> 26:16 27:10  <b>summer (1)</b> 25:3  <b>supplemented (1)</b> 18:3  <b>support (7)</b> 10:7,13,15 12:13 14:2            18:23 22:24</p>	<p><b>supported (1)</b> 29:8  <b>supporting (1)</b> 15:11  <b>supports (6)</b> 10:6 11:21 13:18 14:9            27:20 32:17  <b>sure (2)</b> 17:20 31:7  <b>survey (3)</b> 19:15 21:21 22:3  <b>surveyed (2)</b> 19:12 21:18  <b>surveys (1)</b> 22:6  <b>system (15)</b> 10:17,17,18 12:23            18:21 22:23,25 23:9,13,18 28:21            29:15 31:10 35:16,22  <b>systems (5)</b> 12:4,7,17 20:4 25:5</p> <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <p><b>T (2)</b> 37:2,2  <b>take (6)</b> 12:8 14:4 16:10,13 27:16            32:4  <b>taken (1)</b> 36:20  <b>takes (1)</b> 35:20  <b>talked (1)</b> 20:14  <b>TDT (3)</b> 34:21 35:7,14  <b>technical (3)</b> 11:21 12:13 13:25  <b>tenants (1)</b> 7:19  <b>term (1)</b> 34:3  <b>test (1)</b> 17:22  <b>testify (3)</b> 18:5,13 24:2  <b>testifying (2)</b> 34:6 36:23  <b>textiles (1)</b> 30:2  <b>thank (12)</b> 4:7 9:16,17 18:4,9 23:24            24:2,16 28:7 36:14,19,22  <b>theatre (3)</b> 24:12 26:12 27:19  <b>theatres (7)</b> 24:15,25 25:10,16            26:25 27:4,9  <b>thermal (1)</b> 24:25  <b>thing (2)</b> 11:4 13:15  <b>things (1)</b> 28:6  <b>think (3)</b> 4:3 16:2 21:13  <b>third (1)</b> 22:16  <b>Thomas (3)</b> 3:6 24:4,7  <b>thousands (1)</b> 35:10  <b>three (3)</b> 7:11 14:11 15:18  <b>throwing (1)</b> 20:15  <b>THURSDAY (1)</b> 1:11  <b>time (6)</b> 8:7 12:16 14:17 16:23            28:25 36:24  <b>Times (1)</b> 24:15  <b>today (10)</b> 8:11,17,19,23 9:3 16:12            18:13 24:19 33:16 34:6  <b>today's (1)</b> 36:8  <b>tons (1)</b> 35:10  <b>track (2)</b> 31:20,21  <b>trade (2)</b> 9:23 24:11  <b>traditionally (1)</b> 32:19  <b>transcript (2)</b> 8:24 37:12  <b>transfer (2)</b> 7:22 20:25  <b>Transform (5)</b> 18:16,22 34:7,9,15  <b>trash (7)</b> 18:16,22 26:24 30:10</p>	<p>34:7,9,15  <b>trouble (1)</b> 34:3  <b>truck (2)</b> 6:12 20:16  <b>trucks (1)</b> 25:7  <b>true (2)</b> 32:18 37:12  <b>two (1)</b> 7:9  <b>types (3)</b> 5:18,20,22</p> <hr/> <p style="text-align: center;"><b>U</b></p> <hr/> <p><b>ultimate (1)</b> 32:8  <b>undermine (1)</b> 35:5  <b>understand (2)</b> 9:11 16:14  <b>understandable (2)</b> 5:16 10:19  <b>undertake (2)</b> 26:7,8  <b>unfortunately (1)</b> 36:10  <b>unified (1)</b> 10:18  <b>uniform (1)</b> 19:22  <b>uniformed (1)</b> 10:16  <b>unlawful (1)</b> 20:5  <b>unnecessarily (1)</b> 35:11  <b>updates (2)</b> 16:8,24  <b>urge (1)</b> 33:11  <b>urgency (1)</b> 35:7  <b>use (7)</b> 10:8,9 15:19 16:20 17:7            21:11 25:5  <b>uses (1)</b> 16:21  <b>utilize (1)</b> 7:3  <b>utilizing (1)</b> 7:12</p> <hr/> <p style="text-align: center;"><b>V</b></p> <hr/> <p><b>valuable (1)</b> 30:15  <b>value (1)</b> 31:11  <b>venue (2)</b> 26:15,23  <b>venues (1)</b> 26:10  <b>verifiable (1)</b> 23:23  <b>viewing (1)</b> 8:24  <b>vision (1)</b> 10:14  <b>vulnerable (1)</b> 21:24</p> <hr/> <p style="text-align: center;"><b>W</b></p> <hr/> <p><b>waivers (1)</b> 14:16  <b>want (5)</b> 11:18 15:16 17:21,22            23:24  <b>wanted (2)</b> 12:22,22  <b>waste (59)</b> 3:3 5:9 6:12,25 7:7,21            9:15,22,25 10:5 14:15,22 15:15            15:21 16:4 17:17 18:21 19:3,7,11            19:14,19 20:4,7,13,17 21:2 22:5            22:6,14,16,23 23:6,12,14 25:6,17            25:21 28:16,21 29:2 30:2,9,12,23            31:16 32:6,9,10,18 33:6,21 34:2            34:11,11 35:17,25 36:9,12  <b>wastes (2)</b> 12:24 17:12  <b>watching (1)</b> 34:4  <b>water (2)</b> 25:4,14  <b>way (2)</b> 12:11 37:16  <b>ways (2)</b> 12:18 26:2</p>
--	---	--

**Proposed Recycling Rules  
October 22, 2015**

<p><b>we'll (2)</b> 11:7 15:19  <b>we're (11)</b> 4:3 11:10,12,15 13:17              22:18 29:13 30:6 32:24 33:4 34:4  <b>weak (1)</b> 29:2  <b>website (2)</b> 4:25 8:24  <b>week (1)</b> 8:25  <b>welcome (2)</b> 4:4 29:20  <b>welcomes (1)</b> 28:18  <b>WHEREOF (1)</b> 37:18  <b>wide (1)</b> 28:15  <b>widely (1)</b> 30:22  <b>widespread (2)</b> 29:10 36:6  <b>windows (1)</b> 25:2  <b>winter (1)</b> 25:3  <b>wish (3)</b> 8:16 9:7 36:16  <b>within-entitled (1)</b> 37:11  <b>WITNESS (1)</b> 37:18  <b>Wood (4)</b> 3:5 18:7,9,13  <b>work (5)</b> 10:23 11:16 12:8 13:9              17:5  <b>works (1)</b> 13:7  <b>world (3)</b> 16:12,15,19  <b>worry (1)</b> 33:19  <b>worst (1)</b> 30:11  <b>worth (2)</b> 1:12 20:18  <b>wouldn't (1)</b> 35:22  <b>wrap (1)</b> 15:18  <b>written (9)</b> 8:13,17,20,22 9:4 18:2              21:20,23 31:13</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>yard (1)</b> 30:2  <b>year (1)</b> 35:11  <b>years (5)</b> 24:13 28:17,22 32:11              36:11  <b>York (27)</b> 1:14,14 2:4 3:5 4:7,21              5:2,9 8:2 9:14,21 10:4 16:3 18:7              18:14,16,20,21 28:17,22 32:20              34:8,10 35:9 36:13 37:4,8  <b>Yorkers (1)</b> 34:14</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p><b>zone (2)</b> 22:24 35:16  <b>zones (2)</b> 23:15 35:23</p> <hr/> <p style="text-align: center;"><b>0</b></p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p><b>10:08 (1)</b> 2:2  <b>12:00 (1)</b> 36:24  <b>125 (1)</b> 1:12  <b>16-306 (1)</b> 5:7  <b>1992 (2)</b> 5:6 28:24  <b>1st (2)</b> 8:4,6</p>	<hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p><b>2008 (1)</b> 21:16  <b>2010 (1)</b> 29:9  <b>2013 (1)</b> 31:21  <b>2015 (3)</b> 1:11 4:19 37:19  <b>2016 (1)</b> 8:4  <b>2017 (1)</b> 8:6  <b>22 (1)</b> 1:11  <b>25 (2)</b> 19:4 36:11  <b>26th (1)</b> 37:19  <b>2ND (1)</b> 1:13</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p><b>32 (1)</b> 29:8</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p><b>4,000 (1)</b> 21:18  <b>40 (2)</b> 24:14 28:17  <b>400 (1)</b> 19:12</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p><b>61 (1)</b> 21:22  <b>68 (1)</b> 21:19</p> <hr/> <p style="text-align: center;"><b>7</b></p> <hr/> <p><b>700 (1)</b> 24:14  <b>75 (1)</b> 19:17</p> <hr/> <p style="text-align: center;"><b>8</b></p> <hr/> <p><b>80 (1)</b> 24:13  <b>87 (1)</b> 5:6  <b>8th (1)</b> 4:19</p>	
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