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DSNY Proposed Further Amendment of Rule Relating to the Use of Certain Receptacles by Commercial Establishments

I think it is important that the city keeps moving to 100% waste containerization in order to clean our streets. I think the standardization of these containers is important. Following DSNY's Study the future of trash: [DSNY Containerization Report](#), the city concluded that shared side loader containers are the best solution to manage NYC waste for residential waste. I think the same is true for small business commercial waste. In my opinion, the best and fastest way to implement containerization is if NYC provides shared side-loader containers that can be accessible to all residents and small businesses.

This will make life better for the user as well as the service providers. For the user, there are no more trash days. You can through your waste and recycling 24/7 and forget it. For the service providers, no more picking waste by hand or handling multiple streams of waste in one truck. For everyone, cleaner streets, more space on the sidewalk, and fewer rats.



How will it work?

Pick up of residential waste is already included in residents' local taxes. In the same way small businesses could opt to pay a new fee that will include waste pickup. For this small fee, they will have access to city-provided shared containers. There is no investment and nothing to be managed from the side of the small business owner. From the side of the city, just another infrastructure investment that will improve everyone's lives. It will be the small business's decision to pay a fee or continue to directly pay for the carting service. This new fee should be less than what they currently pay and be more convenient. Lower prices can be achieved because the new system will be much more efficient.

Private carting will compete with price and service in different city zones. Private carting companies' job will only be emptying these containers. If containers are equipped with sensors. The sensor will tell the carting companies when to pick it up. No more unnecessary trips, no more overflowing containers. Different carting companies can be given different districts and different streams. Maybe one carting company can compete better in one stream than another. One may specialize in recycling of metal, one in paper and cardboard, one in organic, etc. NYC can be divided into mostly residential and mostly commercial districts. DSNY and private carting will divide the zones accordingly.

How do you make sure people pay the fee? People need to prove to the city that they either had paid the fee or that they have a waste collection contract. Currently, this doesn't happen, and some small businesses drop their waste in residential developments like NYCHA.

These will provide many improvements to small business waste collections such as:

- 1- No more collection dates and times. Containers will be available 24/7.
- 2- No more waste contracts, waste collection is part of a fee based on the business size, type, and revenue.
- 3- No need to invest in containers that may be stolen or broken.
- 4- Some Business Improvement Districts may opt for nicer and more expensive underground containers, to be picked up by bilateral collection trucks, as it is done in many parts of Europe.

Benefits for NYC:

- 1- No more individual oversized and overflowing containers. Currently, businesses are moving to bigger containers that are over the 55 gallon DSNY rule. If trucks are not equipped with lifters, these containers may be too heavy and pose an injury risk to the person collecting the waste. If every business has containers outside on the sidewalk, our sidewalks will be full of these containers, as it already happens in some parts of the city.
- 2- Better recycling. Currently, one private truck pick ups all the waste and mixes it in the compactor. This creates contamination and makes the recycling process harder. It will be better to have one truck pick up only one waste stream, to reduce recycling contamination.
- 3- Each container can hold 8-26 times the amount of waste than a wheeled container. This translates in that they occupy less space on the road, and permit it to be serviced much faster.
- 4- By standardizing these containers, the city creates a more homogeneous and aesthetically pleasing image, as it is currently done in Europe.
- 5- Big business and residential buildings with loading dock can continue using them.

The private carting industry needs is start adopting shared side loader container standards. Private carters will benefit if they offer this service to their clients. It will solve most of their client concerns. The equipment is similar to the cost of what is being used now in a rear loader. Rear loaders are usually operated by 2-3 people. Side loaders can be easily operated 1-2 people.

Regarding how much will this cost?

The truck chassis (MACK LR Diesel which is what the city currently uses), is roughly \$250,000 and the truck body and its installation is about \$200,000. Total price for the truck is around \$450,000. Containers are about \$2,000 dollars. That is 2 assembled trucks (\$900,000) and 300 containers (\$600,000) will cost \$1.5 million total. 300 containers will hold 900 CY all together. This can easily be scaled up.

If one factor that you already budgeted for the truck chassis and that the routes will be more efficient, this should produce a net saving in time, money, diesel and overtime.

I am here to help and answer any questions.

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