

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Regional Director, Region 8

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December 18, 2018

Mr. Jeffrey Richardson
Sr. District Manager
Waste Management of NY, LLC
425 Perinton Parkway
Fairport, NY 14450-9104

Dear Jeff:

Thank you for the call yesterday during which you provided information as to the genesis of some increased odors from operations at the facility late last week. As I understand it, issues related to weather and infrastructure problems, including at least one derailment impacted CSX, in turn causing delays in handling and transport of the waste to High Acres, with some of the waste taking as much as 21 days before it could be disposed of at the facility.

While this may have been an atypical set of circumstances, and the impact short term, it certainly underscores the importance of the incoming waste study currently being undertaken by the company. As the study moves forward and the report is generated, please ensure that a very hard look is taken at the handling, wait times, and transport logistics from all waste streams, and from each transfer station from which waste is transported by rail to High Acres. It should also evaluate the history of these types of delays since the time High Acres began accepting waste by rail, and all reasonable measures that can be implemented to minimize the likelihood or frequency of future such events.

We recognize that some events, particularly related to severe weather, may be unpredictable or unavoidable. However, it seems increasingly clear that transport time from waste being at the curb to being disposed of at the working face is a critical factor in odor generation, likely more critical than mode of transport. The study needs to evaluate that issue thoroughly, as while the logistical problems may occur downstate, the impacts, at the facility and potentially in the neighborhoods, occur in Perinton and

Macedon. If the facility is to continue to rely on rail as the mode of transport for the majority of waste being handled, all steps that can be taken by the company, and those that it can expect and demand from its carrier(s), need to be explored and implemented to ensure that waste coming to this Region can be efficiently and expeditiously processed without frequent delays and the resultant associated problems.

Thank you for your attention to this matter, and for the call explaining the recent set of circumstances.

Very truly yours,

A handwritten signature in blue ink that reads "Paul J. D'Amato". The signature is written in a cursive style with a large initial "P" and "D".

Paul J. D'Amato
Regional Director