

NOLAN & HELLER, LLP

ATTORNEYS AT LAW

David A. Engel
Direct Dial: (518) 449-3300
dengel@nolanandheller.com

39 NORTH PEARL STREET
ALBANY, NEW YORK 12207

TELEPHONE (518) 449-3300
FACSIMILE (518) 432-3123

www.nolanandheller.com

November 1, 2016

VIA U.S. MAIL & E-MAIL:

R4DEP@dec.ny.gov

Mr. Angelo Marcuccio
Deputy Regional Permit Administrator
NYS DEC Region 4
1130 North Westcott Road
Schenectady, NY 12306

**Re: Town of Colonie Landfill
"Area 7 Development"**

**DEC Permit Application ID Numbers: 4-0126-00033/00001 (Solid Waste Management)
4-0126-00033/00009 (Air Title V)
4-0126-00033/000019 (Freshwater/Wetland/
Water Quality Certification)**

Dear Mr. Marcuccio:

Our law firm represents the Town of Halfmoon (the "Town" or "Halfmoon") with respect to the proposed expansion of the Town of Colonie Landfill.

A. Introduction.

Consistent with the Notices issued by the Department (8/24/2016 and 10/7/2016), Halfmoon submits these comments for the purpose of identifying and explaining significant issues that bear on the issues of whether DEC should deny or impose significant permit conditions on the project.

As explained by Halfmoon at the Legislative Public Hearings, the proposed Landfill expansion will have direct and adverse impacts on the Town and its residents. Those adverse impacts are significant and all of them are avoidable if the Department acts responsibly and denies

the pending application. At a minimum, the issues of concern to Halfmoon require an adjudicatory hearing. Dismissal of the Town's concerns without an opportunity for a full evidentiary hearing would be in derogation of the Town's rights. The Town and its residents are entitled to the protections provided by the statutory and regulatory provisions that pertain to the siting and operation of solid management facilities, such as the Colonie Landfill. As discussed more fully below, the proposed Landfill expansion should not proceed. The proposal by Town of Colonie fails to meet the requirements for siting a landfill as established under the Environmental Conservation Law (ECL) and the regulations thereunder.

B. The Application is fatally flawed and cannot be approved as submitted.

1. The Application cannot be treated as a permit modification; it must be treated as an application for a new permit.

The Application has been submitted and treated as "an application for a permit modification to develop and operate Area 7 (Area 7 Development) at the Town of Colonie Landfill."¹ (See Engineering Report, Town of Colonie Landfill, June 2016 prepared for Capital Region Landfills, Inc. by Cornerstone Environmental (emphasis supplied). The characterization of the application as pertaining to a "permit modification" and its treatment as such by DEC is in error.

Section 360-1.8² sets forth the Permit application procedures that apply to solid waste management facilities and sets forth specific limits as to the circumstances under which an

¹ For the reasons discussed infra., it is unclear who the "Applicant" is with respect to the provision Landfill facility. That issue must be resolved before any permit or approval can be issued.

² Unless otherwise identified, all references to regulations pertain to provisions within DEC's Part 360 Regulations for solid waste management facilities.

application may be treated as a “modification” as opposed to a “new application.”

Section 360-1.8(e) “Permit Modifications.” provides that:

- (1) For the purposes of Part 621 of this Title, an application to modify a permit for a solid waste management facility must be treated as a new application if any of the following thresholds are met or exceeded:
 - (i) Expansion of operation. Expansion of the disposal operation beyond the limits of the solid waste authorized by the existing permit.

The DEIS states as follows:

The Area 7 Development is a proposed horizontal and vertical landfill development, generally to the north and west of the active landfill operations, which would increase the permitted height of the landfill to 517 feet above mean sea level (amsl). The preliminary area of proposed liner construction is anticipated to be approximately 60 acres with an additional 45 acres of vertical landfill development over the existing Areas 5 and 6. See DEIS § 1.4 “Project Design” (emphasis supplied).

The Application clearly seeks an expansion of the disposal operations beyond the limits set forth in the current operating permit for the Colonie Landfill; accordingly it must be treated as a new application. The Application clearly does not meet the criteria for a permit modification and must be treated as a new application for a new landfill. See Section 360-2.12 regarding “Applicability.” On this basis alone, the pending application cannot be approved.

2. The Applicant has failed to undertake a site selection study and prepare a site selection report.

The Application is deficient in that it fails to include a “site selection report” including the results of a site selection study. See Section 360-2.12. No site selection process has been undertaken in support of the pending Application.

3. The Application does not qualify for an exception under Section 360-2.12(b) with respect to the need for a site selection study.

Under Section 360-2.12(b), the site selection study and report are not required only if the proposed landfill is included in the local solid waste management plan approved by the Department. In this instance, there is no currently approved solid waste management plan for the Town of Colonie. DEC describes Colonie's plan as "under review." See www.dec.ny.gov/chemical65541.html.

The Applicant's Engineering Report reflects the lack of a current solid waste management plan for the Town. See Engineering Report § 1.4.2. The Engineering Report specifically concedes that:

The most current approved Solid Waste management Plan for the Town of Colonie...was updated for the 2007-2008 calendar years in December, 2009.

While 2007-2008 Plan reportedly refers to "the completion of a design for Landfill Area 7...in 2014," there is no basis for concluding that the prior solid waste management plan resolves the issue of whether the current version of "Area 7" is necessary or appropriate. In any event, the prior lapsed plan cannot be invoked in a circumstance in which no actual plan is in place.

4. The Application and DEIS are deficient with respect to the consideration of alternatives to the proposed action.

The DEIS improperly contains no analysis of alternative sites. At a minimum, this requires that the DEIS be substantially supplemented or the application dismissed. The DEIS asserts a number of invalid reasons to justify the failure to consider alternative sites:

(i) The “existing site can accommodate the proposed development.” This assertion is irrelevant with respect to the need to consider alternatives under SEQRA; this is not a legitimate excuse for the failure to provide analysis of alternative sites.

(ii) The DEIS claims that “given the large footprint required to site a new landfill and the stringent siting criteria, the Town found it was not economically feasible to consider other sites.” See DEIS, page 2. This reasoning is at best tautological and properly dismissed as nonsense. The failure to consider alternative sites cannot be excused based upon the bare assertion that other sites would not be economically feasible. That conclusion can only be reached after an actual analysis of alternative sites is performed; it cannot be used as a basis for not undertaking the analysis in the first instance.

(iii) The DEIS claims that consideration of alternative sites was not required because “Area 7...is included in the NYSDEC-approved LSWMP.” See DEIS Section 4.4. As noted, there is no current DEC approved LSWMP for the Town of Colonie.

5. The consideration of alternatives is flawed because no actual cost figures or economic analysis has been presented.

(i) An alternative to the proposed action is to close the Colonie Landfill as contemplated under its current operating permit and thereafter to export waste for disposal at other facilities. The DEIS (see Section 4.1) dismisses this possibility but presents no economic analysis with respect to tipping fees at other facilities, such as the Finch landfill in Saratoga County.

(ii) It appears more than 80% of the waste currently being disposed in the Colonie Landfill and contemplated for Area 7 originates from outside of the Colonie “LSWMP” area. An analysis as to the costs of accommodating this waste at alternative facilities must be provided in order to support a claim that alternative sites are not feasible. Attached hereto as **Exhibit “A”** is Attachment 3 to the “2015 Annual Report for the Town of Colonie Landfill” prepared by SCS Engineering. That document sets forth in detail the “origin” of, and types of wastes disposed in the Colonie Landfill in 2015. This document makes clear that the Landfill serves a regional market that goes well beyond the Town of Colonie to include areas such as Greene, Sullivan, Orange, Dutchess, Ulster, Warren, Schenectady, Saratoga and Washington Counties, as well as Bennington County Vermont, Fairfield County Connecticut, Worcester County Massachusetts and even Hudson County New Jersey. The Report states that 16.748% of the waste originated in Albany County. Given these facts, it makes no sense to dismiss the consideration of alternative sites based on the claim that a facility of the magnitude proposed in the Application is required to meet the needs of the Town of Colonie and adjacent communities. Significantly, Saratoga County is shown as the source of 29.182% of the waste. This fact alone compels a full analysis of the Finch Landfill as an alternative to the Colonie Landfill.

(iii) The DEIS provides no basis for the claim that if the Colonie “landfill were to close, waste would be diverted to other facilities, thereby requiring transfer and long-distance hauling, causing increased fuel consumption and an increase in air contaminant emissions.” That claim is without any supporting documentation and analysis. It cannot be

reconciled with the information set forth in the Town's Annual Report with respect to the "origin" of waste disposed in 2015.

(iv) The claims in the DEIS as to the budgetary implications for the Town of Colonie of closing its landfill are irrelevant and appear to be intended to mislead the decision-making process. See DEIS Section 4.1. The DEIS claims that:

In addition to the increased cost of disposal for its residents, the Town would suffer financially from closing the landfill. In the 2015 Town of Colonie Budget, the Town is estimating revenues of \$30 million from real property taxes. The projected annual payments of \$1.6 million by the private operator of the landfill represents 5.3% of the current revenue from real property taxes. If this revenue were lost, the Town would have to increase property taxes by 5.3% to make up the difference (or cut costs or find other sources of revenue) as discussed in Section 2.8.2 of this DEIS.

This analysis is misleading for the following reasons:

- a. The economic rationale presented does not excuse the lack of analysis as to alternatives all of which may have positive economic and/or environmental effects or implications.
- b. The comparison of \$1.6 million in revenue to the Town's total property tax revenue is misleading. The Town's property taxes make up approximately 23.6% of the total revenues for the Town.
- c. If the need for \$1.6 million on an annual basis is the primary basis for the Town to maintain operation of its landfill, then the alternative analysis should include a full range of options relating to the Town's expenses and revenue practices. See, Town of Colonie, New York Financial Report 2015 prepared by BST & Co. CPAs, LLP provided herewith as **Exhibit "B"**.

6. The Application is deficient with respect to the analysis of “Visual Resources” and the visual or scenic report of the proposed Landfill.

The analysis of Visual Resources and impacts are set forth in Section 2.9 of the DEIS. The discussion in Section 2.9 is based upon the Visual Resource Assessment set forth in Appendix F to the DEIS prepared by Saratoga Associates. The Visual Resource Assessment is replete with errors and deficiencies.

i. The Landfill is and will be visible from the Mohawk River. Appendix F includes two “Viewshed Maps” (figures 2 and 3). Both of those viewshed maps fail to include the Mohawk River as a location from which the Landfill is, or will be visible. The Mohawk River is an important recreational and scenic resource. Boat traffic is common on the River in the vicinity of the project area. The viewshed analysis indicates that the Landfill is and will be visible from the Saratoga County shoreline in Halfmoon and Waterford. The viewshed analysis suggests that the Landfill is and will be invisible from the perspective of someone on the River. This is clearly wrong.

ii. The Viewshed, which includes “existing forest vegetation”, seriously understates the visibility of the current Landfill and the visibility of the expanded Landfill. Based upon actual observations from within the Viewshed, it appears that Figure 3 to Appendix F fails to include areas from which the Landfill is clearly visible and areas from which visibility will increase with project development. The Department should undertake an independent analysis of the visual impacts of the project and dismiss the Applicant’s inadequate assessment.

iii. The Applicant’s “Visual Resource Assessment” fails to comply with DEC’s

Program Policy for “Assessing and Mitigating Visual Projects” (“Visual Impact Policy”). The Visual Impact Policy states that that a five mile radius be analyzed for visual impacts. The Applicants’ Visual Resource Assessment is based upon a three mile radius. As such, significant portions of Halfmoon have been omitted from the assessment. Viewshed maps show the project as visible at a distance of three (3) miles. This fact alone indicates that a visual analysis should have been carried out beyond the distance to the recommended five (5) mile radius.

iv. DEC’s Visual Impact Policy identifies mitigation strategies including alternative designs to “downsize” or achieve a “low profile” for proposed projects. The Applicant should provide an analysis of alternatives that downsize the proposed facility and do not require an increase in its profile. The consideration of downsizing is absolutely appropriate given the relatively small percentage of local waste disposed at the facility.

v. As recognized in Appendix F, the Crescent Trail is a visual resource within the viewshed of the Colonic Landfill. The Crescent Trail is located within Halfmoon’s Crescent Trail Park. This is an important recreational and scenic resource for the Town. Appendix F recognizes that Crescent Trail is a resource of statewide significance. However, there is no analysis or assessment provided as to the impact on this resource that will arise from the proposed landfill expansion. Crescent Trail Park is located north-northwest of the Landfill on the north shore of the Mohawk River with generally full and unobstructed views towards the Landfill. Depending upon wind direction, Crescent Trail Park is often impacted by fugitive odors from the Landfill. Neither the DEIS nor Appendix F provide any meaningful analysis as to the impact of the project on the Park

and its users. Appendix F merely acknowledges that the Crescent Trail exists. No analysis has been provided as to Park utilization and whether the aesthetic experience associated with the Park will be degraded by the increase in Landfill size. The DEIS should include that type of analysis.

vi. The “Project Visualizations” included in Appendix F are inadequate for assessing the impact of the project on the areas of greatest concern within Halfmoon. None of the visualizations include the views from the Crescent Trail Park or any of the other locations along the shoreline of the River within Halfmoon. The visualizations from “Rte 9 North of Crescent Bridge” are not representative of the views directly along the River. Further, the Rite 9 visualizations appear to have been composed in order to place the landfill behind a cacophony of traffic and traffic lights. Those views are not representative of the views from Crescent Trail Park and other locations on Halfmoon shoreline.

The DEIS and Appendix are wholly inadequate with respect to the assessment of the visual impact of the Project. The Department should require the Applicant to conduct a complete analysis of visual impacts.

7. The Application and DEIS fail to address the odor problems at the Colonie Landfill.

Fugitive odors have long been a problem arising from the Colonie Landfill. The DEIS asserts that:

The proposed Area 7 Development would result in the continuation of working face operations and the potential odors associated with them. Existing odor minimization measures would be continued throughout the operational period of the Proposed Area 7 Development and odors are not expected to increase beyond those resulting from

current permitted activities. Best management practices would continue to be used to minimize odors at the landfill and prevent them from moving off site. See DEIS, page 6.

The truth is that the “existing odor minimization measures” have not been effective. No confidence can be taken from the claim that “odors are not expected to increase.” Depending upon wind direction, odors from the landfill routinely migrate into Halfmoon. Attached hereto as **Exhibit “C”** is the September 26, 2016 submission by Halfmoon Town Supervisor Kevin Tollisen.

The DEIS asserts that the “gas collection and control system (GCCS)” would “significantly reduce potential odors through capture and destruction of odor-causing components” of “landfill gas (LFG).” At the same time, the DEIS also acknowledges that the new GCCS “would be similar to the system that is currently installed.” DEIS page 6. The Application and supporting documents provide nothing that demonstrates how a GCCS system that has historically failed to control odors at the current Landfill will now resolve odor problems as the Landfill expands.

The Department should reject the Applicant’s analysis of odor problems. The Application should be held in abeyance pending the completion of a full investigation and analysis of the present odor problems at the Landfill. Unless and until the current odor problems are fully resolved, the proposed expansion should be held in abeyance.

8. The identity of the Applicant needs to be resolved.

The Application documents identify the Town of Colonie as the owner of the landfill and Capital Region Landfills, Inc. as the operator. Capital Region Landfills, Inc. is owned by Waste Connections, Inc. (“WC”). See www.townofcolonielandfills.com. WC also owns County Waste.

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County Waste describes itself as the “largest waste collection...Company in the Capital Region of New York.” See www.county-waste.com.

It appears that while the Town of Colonie holds title to the landfill property, the real party in interest is Waste Connections, Inc., as the parent of Capital Region Landfills, Inc. Attached hereto as **Exhibit “D”** is a description of the Landfill and WC’s role as operator from the Capital Region Landfills, Inc. website. As stated in the website, the Colonie Landfill is “Waste Connections project.” Based upon this information, the Department should require that Waste Connections be identified as an applicant in this matter.

As a private applicant, Waste Connections, including its subsidiaries should be subject to a full review of its compliance history and its suitability for operating the facility. It appears that the violations at the Colonie Landfill in 2014 for which the Town of Colonie was held responsible in DEC’s 2015 Order on Consent No. R4-2015-0708-81 were entirely the result of WC’s failure to abide by applicable regulations and permit conditions. Attached hereto as **Exhibit “E”** is the 2015 DEC Order on Consent. The current Application should be held in abeyance pending the proper identification of Waste Connections as an applicant and a full review of the compliance history of Waste Connections with respect to its operations throughout the United States.

On its website for the Colonie Landfill, Waste Connections claims that it is “Better than Perfect.” Waste Connections also claims that “we take actions above and beyond state requirements.” Those claims cannot be reconciled with the violations set forth in the 2015 Consent Order and the persistence of odor problems at the facility. The Department should require a full

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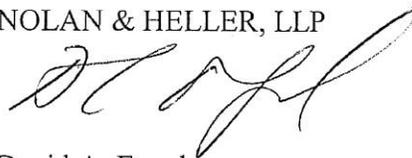
compliance review of WC. No further permits or approvals should be issued unless full financial assurances regarding compliance with landfill operations and closure are provided by WC. In light of the operational issues associated with the facility, any permit or approval should require that WC bear the full cost for a qualified Environmental Monitor to be present at the facility on a full-time basis. This practice has been routinely observed and required by DEC at other permitted facilities permitted under DEC's part 360 Regulations. Given the magnitude of the proposed "Area 7" expansion, that requirement should be imposed on Waste Connections.

C. Conclusion.

For the reasons set forth herein, the application for expansion on the Colonie Landfill is inadequate. It should be returned to the Applicants for revisions consistent with the comments submitted by Halfmoon and other parties. Should DEC elect to allow this application to proceed, a full evidentiary hearing should be held on all of the substantive issues identified herein and those issues identified by other parties.

Very truly yours,

NOLAN & HELLER, LLP



David A. Engel

Cc: Honorable Molly T. McBride, Administrative Law Judge (via U.S. Regular Mail)
118025

EXHIBIT "A"

Attachment 3
Origin Tables for Solid Waste Disposed

2015 MSW BY ORIGIN

ORIGIN	COUNTY	MATERIAL	WEIGHT (Tons)
ALBANY	Albany	GARBAGE	7,055.14
ALTAMONT	Albany	GARBAGE	2.33
BETHLEHEM	Albany	GARBAGE	49.65
COEYMANS	Albany	GARBAGE	0.19
COHOES	Albany	GARBAGE	7,140.47
COLONIE TOWN	Albany	GARBAGE	11,361.80
COLONIE VILLAGE	Albany	GARBAGE	2,635.82
DELMAR	Albany	GARBAGE	33.01
GREEN ISLAND	Albany	GARBAGE	30.19
GUILDERLAND	Albany	GARBAGE	875.56
LATHAM	Albany	GARBAGE	4.84
MENANDS	Albany	GARBAGE	835.59
SELKIRK	Albany	GARBAGE	27.06
SLINGERLANDS	Albany	GARBAGE	7.94
WATERVLIET	Albany	GARBAGE	102.14
ALBANY COUNTY SUB TOTAL			30,161.73
BENNINGTON, VT	Bennington, VT	GARBAGE	52.56
BENNINGTON, VT COUNTY SUB TOTAL			52.56
CLINTON CORNERS, NY	Dutchess	GARBAGE	28.75
POUGHKEEPSIE	Dutchess	GARBAGE	5,608.40
DUTCHESS COUNTY SUB TOTAL			5,637.15
SHELTON, CT	Fairfield, CT	GARBAGE	21.41
FAIRFIELD, CT COUNTY SUB TOTAL			21.41
JOHNSTOWN	Fulton	GARBAGE	36.26
FULTON COUNTY SUB TOTAL			36.26
CAIRO	Greene	GARBAGE	1.24
GREENE COUNTY SUB TOTAL			1.24
BERLIN	Rensselaer	GARBAGE	48.30
BRUNSWICK	Rensselaer	GARBAGE	200.30
EAST GREENBUSH	Rensselaer	GARBAGE	0.38
HOOSICK FALLS	Rensselaer	GARBAGE	38.37
NASSAU	Rensselaer	GARBAGE	6.09
PETERSBURG	Rensselaer	GARBAGE	2.82
POESTENKILL	Rensselaer	GARBAGE	0.34
RENSSELAER	Rensselaer	GARBAGE	111.85
SAND LAKE	Rensselaer	GARBAGE	10.82
SCHAGHTICOKE	Rensselaer	GARBAGE	0.38
SCHODACK	Rensselaer	GARBAGE	771.43
TROY	Rensselaer	GARBAGE	70,955.51
RENSSELAER COUNTY SUB TOTAL			72,146.59
RUTLAND, VT	Rutland, VT	GARBAGE	279.88
RUTLAND, VT COUNTY SUB TOTAL			279.88

2015 MSW BY ORIGIN

ORIGIN	COUNTY	MATERIAL	WEIGHT (Tons)
BALSTON SPA	Saratoga	GARBAGE	7.76
BURNT HILLS	Saratoga	GARBAGE	0.25
CLIFTON PARK	Saratoga	GARBAGE	115,113.41
HALFMOON	Saratoga	GARBAGE	279.10
MALTA	Saratoga	GARBAGE	13.04
MECHANICVILLE	Saratoga	GARBAGE	225.55
MIDDLE GROVE	Saratoga	GARBAGE	0.06
SARATOGA	Saratoga	GARBAGE	210.36
SARATOGA SPRINGS	Saratoga	GARBAGE	6.52
STILLWATER	Saratoga	GARBAGE	74.83
WATERFORD	Saratoga	GARBAGE	376.84
SARATOGA COUNTY SUB TOTAL			116,307.72
GLENVILLE	Schenectady	GARBAGE	16.93
NISKAYUNA	Schenectady	GARBAGE	77.67
ROTTERDAM	Schenectady	GARBAGE	32.93
SCHENECTADY	Schenectady	GARBAGE	770.29
SCOTIA	Schenectady	GARBAGE	367.29
SCHENECTADY COUNTY SUB TOTAL			1,265.11
COBLESKILL	Schoharie	GARBAGE	3.04
SCHOHARIE COUNTY SUB TOTAL			3.04
KINGSTON	Ulster	GARBAGE	31.95
ULSTER COUNTY SUB TOTAL			31.95
COMSTOCK	Washington	GARBAGE	0.21
FORT ANN	Washington	GARBAGE	1,411.35
HUDSON FALLS	Washington	GARBAGE	27.80
WASHINGTON COUNTY SUB TOTAL			1,439.36
MSW TOTAL			227,384.00

2015 DEMOLITION BY ORIGIN

ORIGIN	COUNTY	MATERIAL	WEIGHT (Tons)
ALBANY	Albany	DEMO	809.95
ALTAMONT	Albany	DEMO	7.33
BETHLEHEM	Albany	DEMO	2.98
COEYMANS	Albany	DEMO	4.12
COHOES	Albany	DEMO	1,229.89
COLONIE TOWN	Albany	DEMO	379.92
COLONIE VILLAGE	Albany	DEMO	223.06
DELMAR	Albany	DEMO	26.66
EAST BERNE	Albany	DEMO	1.57
GLENMONT	Albany	DEMO	5.36
GREEN ISLAND	Albany	DEMO	396.57
GUILDERLAND	Albany	DEMO	1,884.42
MENANDS	Albany	DEMO	35.12
NEW SCOTLAND	Albany	DEMO	3.29
RAVENA	Albany	DEMO	25.34
SELKIRK	Albany	DEMO	28.36
SLINGERLANDS	Albany	DEMO	9.87
WATERVLIET	Albany	DEMO	395.71
WESTERLO	Albany	DEMO	3.77
ALBANY COUNTY SUB TOTAL			5,473.29
CHATHAM	Columbia	DEMO	99.21
HUDSON	Columbia	DEMO	1.03
VALATIE	Columbia	DEMO	0.53
COLUMBIA COUNTY SUB TOTAL			100.77
POUGHKEEPSIE	Dutchess	DEMO	63.62
DUTCHESS COUNTY SUB TOTAL			63.62
BROADALBIN	Fulton	DEMO	2.03
JOHNSTOWN	Fulton	DEMO	3.68
FULTON COUNTY SUB TOTAL			5.71
AMSTERDAM	Montgomery	DEMO	7.97
MONTGOMERY COUNTY SUB TOTAL			7.97
MIDDLETOWN	Orange	DEMO	1.97
ORANGE COUNTY SUB TOTAL			1.97
BERLIN	Rensselaer	DEMO	42.91
BRUNSWICK	Rensselaer	DEMO	80.53
CASTLETON	Rensselaer	DEMO	8.95
CROPSEYVILLE	Rensselaer	DEMO	0.19
EAST GREENBUSH	Rensselaer	DEMO	28.13
HOOSICK FALLS	Rensselaer	DEMO	29.41
MELROSE	Rensselaer	DEMO	9.40
NASSAU	Rensselaer	DEMO	40.15
NORTH GREENBUSH	Rensselaer	DEMO	9.85
POESTENKILL	Rensselaer	DEMO	13.54
RENSSELAER	Rensselaer	DEMO	63.18
SAND LAKE	Rensselaer	DEMO	29.83
SCHAGHTICOKE	Rensselaer	DEMO	41.46
SCHODACK	Rensselaer	DEMO	8.42
STEPHENTOWN	Rensselaer	DEMO	3.88
TROY	Rensselaer	DEMO	590.33
WYNANTSKILL	Rensselaer	DEMO	26.50
RENSSELAER COUNTY SUB TOTAL			1,026.66

2015 DEMOLITION BY ORIGIN

ORIGIN	COUNTY	MATERIAL	WEIGHT (Tons)
BALSTON	Saratoga	DEMO	18.95
BALSTON SPA	Saratoga	DEMO	30.23
BURNT HILLS	Saratoga	DEMO	13.69
CHARLTON	Saratoga	DEMO	12.04
CLIFTON PARK	Saratoga	DEMO	1927.97
GALWAY	Saratoga	DEMO	11.16
HALFMOON	Saratoga	DEMO	230.14
MALTA	Saratoga	DEMO	94.60
MECHANICVILLE	Saratoga	DEMO	70.41
MIDDLE GROVE	Saratoga	DEMO	0.10
MILTON	Saratoga	DEMO	3.51
SARATOGA	Saratoga	DEMO	128.92
STILLWATER	Saratoga	DEMO	18.06
WATERFORD	Saratoga	DEMO	300.89
WEST MILTON	Saratoga	DEMO	189.21
SARATOGA COUNTY SUB TOTAL			3,049.88
DUANESBURG	Schenectady	DEMO	2.04
GLENVILLE	Schenectady	DEMO	19.74
NISKAYUNA	Schenectady	DEMO	116.93
ROTTERDAM	Schenectady	DEMO	47.09
SCHENECTADY	Schenectady	DEMO	678.53
SCOTIA	Schenectady	DEMO	25.15
SCHENECTADY COUNTY SUB TOTAL			889.48
MIDDLEBURGH	Schoharie	DEMO	449.25
SCHOHARIE COUNTY SUB TOTAL			449.25
HIGHLAND	Sullivan	DEMO	437.43
LIBERTY	Sullivan	DEMO	1.47
SULLIVAN COUNTY SUB TOTAL			438.90
KERHONKSON	Ulster	DEMO	1.55
ULSTER COUNTY SUB TOTAL			1.55
LAKE GEORGE	Warren	DEMO	11.25
WARREN COUNTY SUB TOTAL			11.25
COMSTOCK	Washington	DEMO	0.12
FORT ANN	Washington	DEMO	576.76
GREENWICH	Washington	DEMO	25.62
WASHINGTON COUNTY SUB TOTAL			602.50
DEMO TOTAL			12,122.80

2015
INDUSTRIAL WASTE AND ALUM SLUDGE BY ORIGIN

ORIGIN	COUNTY	MATERIAL	WEIGHT (Tons)
ALBANY	Albany	IND	28.76
CÖHOES	Albany	IND	4.77
COLONIE TOWN	Albany	IND	769.59
FEURA BUSH	Albany	IND	43.55
RAVENA	Albany	IND	83.82
SELKIRK	Albany	IND	397.58
ALBANY COUNTY SUB TOTAL			1,328.07
POUGHKEEPSIE	Dutchess	IND	35.43
DUCHESSE COUNTY SUB TOTAL			35.43
BROADALBIN	Fulton	IND	111.97
FULTON COUNTY SUB TOTAL			111.97
ATHENS	Greene	IND	55.75
CATSKILL	Greene	IND	687.08
GREENE COUNTY SUB TOTAL			742.83
HOOSICK FALLS	Rensselaer	IND	316.29
PETERSBURG	Rensselaer	IND	11.78
RENSSELAER	Rensselaer	IND	26.26
TROY	Rensselaer	IND	15.77
RENSSELAER COUNTY SUB TOTAL			370.10
BALSTON SPA	Saratoga	IND	12.54
WATERFORD	Saratoga	IND	6.94
SARATOGA COUNTY SUB TOTAL			19.48
SCHENECTADY	Schenectady	IND	13.07
SCHENECTADY COUNTY SUB TOTAL			13.07
ULSTER PARK	Ulster	IND	11.22
ULSTER COUNTY SUB TOTAL			11.22
QUEENSBURY	Warren	IND	19.94
WARREN COUNTY SUB TOTAL			19.94
FORT EDWARD	Washington	IND	17.14
HUDSON FALLS	Washington	IND	14.56
WASHINGTON COUNTY SUB TOTAL			31.70
INDUSTRIAL WASTE ONLY TOTAL			2,683.81
COLONIE TOWN	Albany	ALUM SLUD.	1210.48
ALBANY COUNTY ALUM SLUDGE SUB TOTAL			1,210.48
ALUM SLUDGE ONLY TOTAL			1,210.48
ALBANY COUNTY SUB TOTAL INDUSTRIAL & ALUM SLUDGE			2,538.55
INDUSTRIAL & ALUM SLUDGE WASTE TOTAL			3,894.29

2015 POTW SLUDGE BY ORIGIN

ORIGIN	COUNTY	MATERIAL	WEIGHT (Tons)
ALBANY	Albany	SS GRIT	55.79
COLONIE TOWN	Albany	SS GRIT	5702.09
GUILDERLAND	Albany	SS GRIT	67.50
ALBANY COUNTY SUB TOTAL			5,825.38
VALATIE	Columbia	SS GRIT	58.42
COLUMBIA COUNTY SUB TOTAL			58.42
JOHNSTOWN	Fulton	SS GRIT	14.40
FULTON COUNTY SUB TOTAL			14.40
ATHENS	Greene	SS GRIT	58.72
GREENE COUNTY SUB TOTAL			58.72
FONDA	Montgomery	SS GRIT	712.51
MONTGOMERY COUNTY SUB TOTAL			712.51
RENSSELAER	Rensselaer	SS GRIT	153.35
RENSSELAER COUNTY SUB TOTAL			153.35
CLIFTON PARK	Saratoga	SS GRIT	236.76
MECHANICVILLE	Saratoga	SS GRIT	217.01
SARATOGA	Saratoga	SS GRIT	11.49
SARATOGA COUNTY SUB TOTAL			465.26
KINGSTON	Ulster	SS GRIT	3294.00
ULSTER COUNTY SUB TOTAL			3,294.00
GLENS FALLS	Warren	SS GRIT	411.11
WARREN COUNTY SUB TOTAL			411.11
COMSTOCK	Washington	SS GRIT	18.22
WASHINGTON COUNTY SUB TOTAL			18.22
POTW SLUDGE TOTAL			11,011.37

2015 COUNTY ORIGIN SUMMARY

COMMODITY		Percent by County	% of Total by County
<i>DEMO</i>			
ALBANY COUNTY SUB TOTAL	5,473.29	45.149%	1.287%
COLUMBIA COUNTY SUB TOTAL	100.77	0.831%	0.024%
DUTCHESS COUNTY SUB TOTAL	63.62	0.525%	0.015%
FULTON COUNTY SUB TOTAL	5.71	0.047%	0.001%
MONTGOMERY COUNTY SUB TOTAL	7.97	0.066%	0.002%
ORANGE COUNTY SUB TOTAL	1.97	0.016%	0.000%
RENSSELAER COUNTY SUB TOTAL	1,026.66	8.469%	0.241%
SARATOGA COUNTY SUB TOTAL	3,049.88	25.158%	0.717%
SCHENECTADY COUNTY SUB TOTAL	889.48	7.337%	0.209%
SCHOHARIE COUNTY SUB TOTAL	449.25	3.706%	0.106%
SULLIVAN COUNTY SUB TOTAL	438.90	3.620%	0.103%
ULSTER COUNTY SUB TOTAL	1.55	0.013%	0.000%
WARREN COUNTY SUB TOTAL	11.25	0.093%	0.003%
WASHINGTON COUNTY SUB TOTAL	602.50	4.970%	0.142%
DEMO TOTAL	12,122.80	100.000%	2.850%

<i>PCS</i>			
ALBANY COUNTY SUB TOTAL	1,195.31	3.616%	0.281%
BENNINGTON, VT COUNTY SUB TOTAL	246.98	0.747%	0.058%
BERKSHIRE, MA COUNTY SUB TOTAL	7.53	0.023%	0.002%
COLUMBIA COUNTY SUB TOTAL	511.96	1.549%	0.120%
DUTCHESS COUNTY SUB TOTAL	221.39	0.670%	0.052%
FULTON COUNTY SUB TOTAL	1,319.95	3.993%	0.310%
GREENE COUNTY SUB TOTAL	2,263.16	6.846%	0.532%
HAMPDEN, MA COUNTY SUB TOTAL	6.92	0.021%	0.002%
ORANGE COUNTY SUB TOTAL	4,045.83	12.239%	0.951%
RENSSELAER COUNTY SUB TOTAL	12,782.92	38.670%	3.006%
ROCKLAND COUNTY SUB TOTAL	49.32	0.149%	0.012%
SARATOGA COUNTY SUB TOTAL	1,243.24	3.761%	0.292%
SCHENECTADY COUNTY SUB TOTAL	6,252.46	18.914%	1.470%
SCHOHARIE COUNTY SUB TOTAL	13.17	0.040%	0.003%
ULSTER COUNTY SUB TOTAL	1,890.26	5.718%	0.444%
WARREN COUNTY SUB TOTAL	193.42	0.585%	0.045%
WASHINGTON COUNTY SUB TOTAL	38.07	0.115%	0.009%
WESTCHESTER COUNTY SUB TOTAL	765.63	2.316%	0.180%
WORCESTER, MA COUNTY SUB TOTAL	9.14	0.028%	0.002%
PCS TOTAL	33,056.66	100.000%	7.772%

2015 COUNTY ORIGIN SUMMARY

COMMODITY		Percent by County	<u>% of Total by County</u>
<i>MSW</i>			
ALBANY COUNTY SUB TOTAL	30,161.73	13.265%	7.092%
BENNINGTON, VT COUNTY SUB TOTAL	52.56	0.023%	0.012%
DUTCHESS COUNTY SUB TOTAL	5,637.15	2.479%	1.325%
FAIRFIELD, CT COUNTY SUB TOTAL	21.41	0.009%	0.005%
FULTON COUNTY SUB TOTAL	36.26	0.016%	0.009%
GREENE COUNTY SUB TOTAL	1.24	0.001%	0.000%
RENSSELAER COUNTY SUB TOTAL	72,146.59	31.729%	16.963%
RUTLAND, VT COUNTY SUB TOTAL	279.88	0.123%	0.066%
SARATOGA COUNTY SUB TOTAL	116,307.72	51.150%	27.347%
SCHENECTADY COUNTY SUB TOTAL	1,265.11	0.556%	0.297%
SCHOHARIE COUNTY SUB TOTAL	3.04	0.001%	0.001%
ULSTER COUNTY SUB TOTAL	31.95	0.014%	0.008%
WASHINGTON COUNTY SUB TOTAL	1,439.36	0.633%	0.338%
MSW TOTAL	227,384.00	100.000%	53.464%

<i>INDUSTRIAL & ALUM SLUDGE</i>			
ALBANY COUNTY SUB TOTAL INDUSTRIAL & ALUM SLUDG	2,538.55	65.186%	0.597%
DUTCHESS COUNTY SUB TOTAL INDUSTRIAL	35.43	0.910%	0.008%
FULTON COUNTY SUB TOTAL INDUSTRIAL	111.97	2.875%	0.026%
GREENE COUNTY SUB TOTAL INDUSTRIAL	742.83	19.075%	0.175%
RENSSELAER COUNTY SUB TOTAL INDUSTRIAL	370.10	9.504%	0.087%
SARATOGA COUNTY SUB TOTAL INDUSTRIAL	19.48	0.500%	0.005%
SCHENECTADY COUNTY SUB TOTAL INDUSTRIAL	13.07	0.336%	0.003%
ULSTER COUNTY SUB TOTAL INDUSTRIAL	11.22	0.288%	0.003%
WARREN COUNTY SUB TOTAL INDUSTRIAL	19.94	0.512%	0.005%
WASHINGTON COUNTY SUB TOTAL INDUSTRIAL	31.70	0.814%	0.007%
INDUSTRIAL & ALUM SLUDGE TOTAL	3,894.29	100.000%	0.916%

<i>POTW SLUDGE</i>			
ALBANY COUNTY SUB TOTAL	5,825.38	52.903%	1.370%
COLUMBIA COUNTY SUB TOTAL	58.42	0.531%	0.014%
FULTON COUNTY SUB TOTAL	14.40	0.131%	0.003%
GREENE COUNTY SUB TOTAL	58.72	0.533%	0.014%
MONTGOMERY COUNTY SUB TOTAL	712.51	6.471%	0.168%
RENSSELAER COUNTY SUB TOTAL	153.35	1.393%	0.036%
SARATOGA COUNTY SUB TOTAL	465.26	4.225%	0.109%
ULSTER COUNTY SUB TOTAL	3,294.00	29.915%	0.775%
WARREN COUNTY SUB TOTAL	411.11	3.734%	0.097%
WASHINGTON COUNTY SUB TOTAL	18.22	0.165%	0.004%
POTW SLUDGE TOTAL	11,011.37	100.000%	2.589%

2015 COUNTY ORIGIN SUMMARY

COMMODITY		Percent by County	<u>% of Total by County</u>
<i>ROAD BASE</i>			
ALBANY COUNTY SUB TOTAL	1,973.76	36.951%	0.464%
RENSSELAER COUNTY SUB TOTAL	277.02	5.186%	0.065%
SARATOGA COUNTY SUB TOTAL	3,032.11	56.764%	0.713%
SCHENECTADY COUNTY SUB TOTAL	58.70	1.099%	0.014%
ROAD BASE TOTAL	5,341.59	100.000%	1.256%

<i>ASH</i>			
DUTCHESS COUNTY SUB TOTAL	53,493.25	54.186%	12.578%
WASHINGTON COUNTY SUB TOTAL	45,227.73	45.814%	10.634%
ASH TOTAL	98,720.98	100.000%	23.212%

<i>ASR</i>			
ALBANY COUNTY SUB TOTAL	24.83	0.445%	0.006%
FRANKLIN, MA COUNTY SUB TOTAL	677.65	12.146%	0.159%
HUDSON, NJ COUNTY SUB TOTAL	4,876.74	87.409%	1.147%
ASR TOTAL	5,579.22	100.000%	1.312%

<i>CRUSHED GLASS</i>			
ALBANY COUNTY SUB TOTAL	24,889.18	98.078%	5.852%
FAIRFIELD, CT COUNTY SUB TOTAL	487.85	1.922%	0.115%
CRUSHED GLASS TOTAL	25,377.03	100.000%	5.967%

<i>PAPER SLUDGE</i>			
WARREN COUNTY SUB TOTAL	2,818.68	100.000%	0.663%
PAPER SLUDGE TOTAL	2,818.68	100.000%	0.663%
GRAND TOTAL ALL COMMODITIES	425,306.62		

2015 COUNTY ORIGIN SUMMARY

TOTAL WASTE PERCENTAGE BY COUNTY	COUNTY TOTAL WASTE TONNAGE	COUNTY % OF TOTAL TONNAGE
ALBANY COUNTY TOTAL ALL COMMODITIES	72,082.03	16.948%
BENNINGTON, VT COUNTY TOTAL ALL COMMODITIES	299.54	0.070%
BERKSHIRE, MA COUNTY TOTAL ALL COMMODITIES	7.53	0.002%
COLUMBIA COUNTY TOTAL ALL COMMODITIES	671.15	0.158%
DUTCHESS COUNTY TOTAL ALL COMMODITIES	59,450.84	13.978%
FAIRFIELD, CT COUNTY TOTAL ALL COMMODITIES	509.26	0.120%
FRANKLIN, MA COUNTY TOTAL ALL COMMODITIES	677.65	0.159%
FULTON COUNTY TOTAL ALL COMMODITIES	1,488.29	0.350%
GREENE COUNTY TOTAL ALL COMMODITIES	3,065.95	0.721%
HAMPDEN, MA COUNTY TOTAL ALL COMMODITIES	6.92	0.002%
HUDSON, NJ COUNTY TOTAL ALL COMMODITIES	4,876.74	1.147%
MONTGOMERY COUNTY ALL COMMODITIES	720.48	0.169%
ORANGE COUNTY TOTAL ALL COMMODITIES	4,047.80	0.952%
RENSSELAER COUNTY TOTAL ALL COMMODITIES	86,756.64	20.399%
ROCKLAND COUNTY TOTAL ALL COMMODITIES	49.32	0.012%
RUTLAND, VT COUNTY TOTAL ALL COMMODITIES	279.88	0.066%
SARATOGA COUNTY TOTAL ALL COMMODITIES	124,117.69	29.183%
SCHENECTADY COUNTY TOTAL ALL COMMODITIES	8,478.82	1.994%
SCHOHARIE COUNTY TOTAL ALL COMMODITIES	465.46	0.109%
SULLIVAN COUNTY TOTAL ALL COMMODITIES	438.90	0.103%
ULSTER COUNTY TOTAL ALL COMMODITIES	5,228.98	1.229%
WARREN COUNTY TOTAL ALL COMMODITIES	3,454.40	0.812%
WASHINGTON COUNTY TOTAL ALL COMMODITIES	47,357.58	11.135%
WESTCHESTER COUNTY TOTAL ALL COMMODITIES	765.63	0.180%
WORCESTER, MA COUNTY TOTAL ALL COMMODITIES	9.14	0.002%
TOTAL	425,306.62	100.000%