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<b>County</b>	Westchester
<b>Check all topics to which your comments apply</b>	Chapter 16. Waste
<b>Comment (2000 characters maximum)</b>	Please see attached document. A hard copy has been overnighted to Draft Scoping Plan Comments NYSERDA 17 Columbia Circle Albany, NY 12203-6399
<b>Upload File(s)</b>	<a href="https://seam.ly/NR95u41m">https://seam.ly/NR95u41m</a> CLCPA Comments - WN Waste Innovations.pdf



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Draft Scoping Plan Comments  
NYSERDA  
17 Columbia Circle  
Albany, NY 12203

Win Waste Innovations hereby submits the following comments to the waste management section of the Draft Scoping Plan (the "Plan") for the Climate Leadership and Community Protection Act.

Win Waste Innovations is a private waste services company headquartered in Portsmouth, New Hampshire with collections, hauling, transfer and end disposal facilities throughout ten states. We own and operate two waste-to-energy (WTE) facilities in New York, located in Westchester County and Hudson Falls, and operate the Dutchess County facility. While we support the overall strategy for the waste management sector outlined in the Plan, we want to make sure that the significance of WTE as an essential component to the sustainable waste management and greenhouse gas (GHG) reduction in New York is recognized.

New York's 10 WTE facilities dispose of more than 11,000 tons per day or 4 million tons of solid waste per year which constitutes approximately 23% of New York's post-recycled solid waste. In addition, these facilities recover and recycle over 110,000 tons of metal annually. WTE is the preferred method of disposal over landfilling according to NYDEC's and USEPA's waste management hierarchy.

New York's WTE facilities are among the most stringently regulated facilities in the State. The advanced emission controls employed by WTE facilities allow them to operate well-below their permitted emission limits and state air quality guidelines protective of public health and the environment.

Most importantly, WTE facilities are net reducers of GHGs. A recent study of our Westchester County WTE facility demonstrated that every ton of waste processed at the facility avoids approximately 1.6 metric tons of CO<sub>2</sub> equivalent emissions from being released to the atmosphere principally through the elimination landfill methane emissions if the waste was disposed at a landfill.

Reducing methane emissions from waste disposal is one of the goals of the Plan. As stated in the Plan methane is one of the most harmful GHGs with a 20-year Global Warming Potential that is 84 times greater than CO<sub>2</sub> based on IPCC's Fifth Assessment Report of Global Warming Potentials. According to the USEPA because methane is both a powerful GHG and short-lived compared to CO<sub>2</sub>, achieving significant reductions in methane would have a rapid and material impact on atmospheric warming potential.

WTE facilities also reduce GHGs by eliminating the need for additional tractor-trailer trips to long-haul waste to alternative disposal sites, reducing our reliance on fossil fuel generation by generating electricity and steam from solid waste, and recovering

thousands of tons of metals each year that would otherwise be manufactured through the use of fossil fuels. WTE is recognized as a source of GHG mitigation by the US Environmental Protection Agency, the European Union, the Intergovernmental Panel on Climate Change, the World Economic Forum, and many others.

Studies in Baltimore, Maryland, Montgomery County, Maryland and Durham, Canada and Europe have demonstrated that there is no impact on human health from properly operating WTE facilities. Other studies have shown that US counties and municipalities that utilize WTE consistently achieve better recycling rates than those that do not.

While the main purpose of WTE facilities is waste disposal, the facilities also produce renewable energy as a byproduct of the waste disposal process. The 10 New York WTE facilities generate 285 MW of baseload power with most facilities operating at greater than a 90% capacity factor. This baseload energy generation supports the electrical system until more solar and wind power generation is brought on-line. Two of the facilities, Niagara, and Westchester, also provide steam to adjacent companies. New York's Energy Law identifies waste-to-energy as renewable.

We appreciate the opportunity to comment on the Plan and request that the final Plan and any ensuing regulations take into account the importance of WTE facilities to solid waste management, GHG reduction and renewable power generation within the State.

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