



July 18, 2025

Syracuse Haulers Waste Removal, Inc.
6223 Thompson Rd, Suite 8000
Syracuse, NY 13206

RE: 7-3126-00070, Syracuse Haulers Waste Removal Inc.
Solid Waste Management – Permit Modification – CLCPA Comments
6223 Thompson Rd, Syracuse, NY, Onondaga County

The New York State Department of Environmental Conservation (DEC) received the CLCPA analysis for the above referenced facility dated September 30, 2024. DEC offers the following comments as they directly relate to the 7(3) portions of your CLCPA analysis.

DEC in a Notice of Incomplete Application (NOIA) dated May 16, 2024, under the section labeled 'CLCPA 7(3) Addendum for mobile emissions', requested that you consider the Delta (change) in GHG and co-pollutants of the proposed modification to the facility, as well as the increased truck traffic, and determine its effect on the two Disadvantaged Communities (DAC) identified. Based upon DEC's review of your analysis labeled "Syracuse Haulers – CLCPA GHG Analysis", this analysis did not consider what specific impacts the proposed modification would have on the DACs and did not address what mitigation measures would be proposed to offset these increases. Specifically, the analysis did not evaluate the increase in GHGs and co-pollutants resulting from the proposed permit modification and the associated increase in truck traffic, and its impact on the DACs. The proposed emission reduction opportunities do not address the effects on disadvantaged communities and measures to offset those impacts.

DEP 24-1 (Permitting and Disadvantaged Communities) states that increases in GHG emissions or co-pollutants resulting from a project associated with any new, modified, or renewed emission sources, including those from stationary or mobile sources directly related to and essential to the proposed action, will require the

preparation of a disproportionate burden analysis to meet the completeness requirements of 6 NYCRR 621.3(a)(13). Therefore, to determine if your proposal has a disproportionate burden on the impacted DACs, DEC is requesting that you update your disproportionate burden analysis consistent with DEP 24-1(V)(6). This analysis must consider the delta in GHG and co-pollutants within the community before and after your proposed action, and must incorporate design considerations, mitigation, and further emission reduction opportunities.

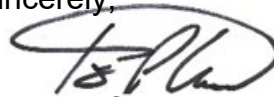
Please also refer to: <https://climate.ny.gov/Resources/Disadvantaged-Communities-Criteria>. This resource discusses the development of criteria to identify DACs. Census Tracts across the state are ranked relative to each other. The percentiles show how the selected tract compares to the 4,918 tracts across the state, using 45 indicators to identify the environmental burdens or climate change risks within a community, or population characteristics and health vulnerabilities that can contribute to more severe effects of climate change. From this, you will need to qualify the criteria within the impacted DACs and determine if your proposal is going to further burden the identified criteria, and what is proposed to offset these burdens, in accordance with the requirements set forth in DAR-21 and DEP 24-1.

Further analysis of the data results within the tables shows that the waste that is diverted from the landfill cannot be credited towards the increases within the DACs, given they are geographically located in different locations. DEC recommends an edit of Table 1 on Page 4, removing the credits from the main table and showing them as potential GHG/HAP/PM savings at the bottom of the table. Additionally, your analysis discusses how GHG's, PM, and co-pollutants through waste stream reduction will reduce emissions from landfills in another counties but does not focus on what is emitted from the heaters and mobile sources at the existing facility. Lastly, the PM air monitoring table is compared to 12 micrograms/m³ annual standard, which was a previous standard. The Federal levels were lowered to 9 micrograms/m³. Please address this in Table 2, Page 8.

In conclusion, the disproportionate burden analysis must identify and address disproportionate burdens on the disadvantaged community. As part of a disproportionate burden analysis, an applicant may propose conditions on the project that would serve to address any disproportionate burden by prioritizing reduction of emissions in the community, as required by Section 7(3) of the CLCPA. If your analysis shows that the expansion is likely to affect a DAC, further project design considerations must be proposed as outlined in Section 6 of DEP 24-1.

If you have any questions, please contact me at 315-426-7445. Thank you.

Sincerely,



Trenderd Choe
Deputy Regional Permit Administrator
Division of Environmental Permits, Region 7

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