

Richard Clarkson, P.E.  
Director, Division of Materials Management  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-7250

March 10, 2026

**Re: Request for 90-Day Public Comment Period – Proposed Rulemaking: On-Site Treatment and Disposal of Leachate at Landfills (6 NYCRR Parts 360 and 363)**

Dear Mr. Clarkson,

We understand that the New York State Department of Environmental Conservation (DEC) intends to publish the rulemaking entitled *On-Site Treatment and Disposal of Leachate at Landfills* (6 NYCRR Parts 360 and 363) soon. On behalf of the undersigned coalition of partner organizations, we respectfully request that the DEC extend the public comment period to a full 90-days from the date of publication in the New York State Register. Given the scope and technical complexity of the proposal, a longer public review period is warranted to support careful evaluation and substantive public input.

This rulemaking addresses the on-site treatment and disposal of landfill leachate—a waste stream known to contain complex mixtures of contaminants, including PFAS and other emerging pollutants of significant public health concern. The proposal carries substantial implications for drinking water sources, wastewater treatment systems, host communities, and solid waste management practices statewide

Specifically:

- The supporting materials for this rulemaking — including the express terms, regulatory impact statement, and related documentation — require careful evaluation by technical experts, water quality professionals, and affected stakeholders.
- The proposed amendments to Parts 360 and 363 represent significant policy shifts with potential long-term environmental and financial consequences for municipalities and communities.
- Extending the review period to 90-days would provide adequate time for geographically diverse stakeholders, including small community organizations with limited resources, to consult experts and develop substantive comments.

Providing additional time will strengthen the administrative record and support NYSDEC in developing a final rule that is more protective of public health and the environment while grounded in comprehensive public input.

Accordingly, we respectfully request that NYSDEC extend the comment deadline to 90 calendar days and publish notice of the extension in both the New York State Register and the Environmental Notice Bulletin.

Sincerely,

**Rebecca Martin**

*Executive Director*

New York River Watch

**Jen Epstein**

*Science Director*

New York River Watch

**Laura Orlando**

*Senior Scientist*

Just Zero

**Andrew Mirchel**

Long Island South Shore Waterkeeper

Save the Great South Bay

**Monique Fitzgerald**

*Co Founder*

Brookhaven Landfill Action and

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**Jen Benson**

*Director of Advocacy & Communications*

Hudson River Sloop Clearwater

**Adam Effler**

*Executive Director*

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*Vice President*

Seneca Lake Guardian (a Waterkeeper affiliate)

**Joseph Campell**

*President*

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**Greg Remaud**

*Baykeeper & Executive Director*

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**Dan Shapley**

*Senior Director, Advocacy Policy & Planning*

Hudson Riverkeeper

**Mayor Gary Bassett**

*Chair*

Hudson River Drinking Water

Intermunicipal Council (Hudson 7)

**Johnathan Clark**

*Advocacy Attorney*

Scenic Hudson, Inc.

**Carol De Angelo, SC**  
ROAR (Religious  
Organizations Along the River) and  
Office of Peace, Justice and Integrity of  
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**Marc Rider**  
*Executive Director*  
Ulster County Resource Recovery  
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**Tracy Frisch**  
Clean Air Action Network of Glens Falls

**Yayoi Koizumi**  
*Founder*  
Zero Waste Ithaca

**Barbara Heinzen**  
*Steering Group Chair*  
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**John Garver**  
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“Notes From a Watershed”

**Nada Khade**  
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*Treasurer and Steering Committee Director*  
Rensselaer Environmental Coalition

CC:  
Governor Kathy Hochul  
Senator Pete Harkham  
Senator Michele Hinchey  
Assemblymember Deborah Glick  
Assemblymember Sarahana Shrestha  
Commissioner Amanda Lefton  
Sarah M. Bogdan (DEC)  
Kimberly D. Sarbo (DEC)