THE RECYCLING PROGRAM AT NEW YORK CITY TRANSIT FACILITIES NEEDS IMPROVEMENT – FINAL

Daniel G. Cort
MTA Inspector General
State of New York

I. EXECUTIVE SUMMARY

New York City Transit (NYC Transit) has contracted with a garbage and recycling carting company (Carting Company) since 2013 to provide waste removal services at its facilities, including bus depots and maintenance shops, which were the focus of this audit.[1] This is the first of two reports that the Office of the MTA Inspector General (OIG) plans to issue on this contract. In accordance with the New York State Public Authorities Law, the contract specifies that NYC Transit personnel will separate recyclable material, such as paper and cardboard, from the general waste stream at these facilities. Additionally, the contract states that the Carting Company will remove recyclables from the facilities at no cost to NYC Transit. The Carting Company is also required to provide NYC Transit with a credit for recyclable material for each month in which the market price of that material exceeds the cost of processing and selling the material. The contract is overseen by the Asset Recovery Unit (Asset Recovery), a division of the Metropolitan Transportation Authority (MTA) Procurement department that serves as the project manager for the contract with the Carting Company.

OIG conducted an audit of the recycling practices, procedures, and oversight at NYC Transit maintenance facilities and bus depots. The audit found that many aspects of the agency's recycling program could be improved. A second audit of the Carting Company's performance and billing practices under the general waste contract for NYC Transit will be publicly reported by OIG at a later date.

A. Summary of Findings

- **NYC Transit personnel did not consistently separate recyclable material as required by State law and by its contract with the Carting Company.** During visits to 40 facilities, OIG observed that at 21 locations, personnel failed to place recyclables in designated containers. Auditors found that some staff were

[1] The OIG audit did not cover passenger refuse collected from stations, for which the contract requires the carting company to separate the recyclables from the non-recyclable waste after collection.

unaware of recycling requirements, and certain containers lacked labels to distinguish them from non-recyclable waste (Waste) bins. Additionally, some facilities had no recycling containers at all. OIG concluded that these factors contributed to inconsistent recycling practices across facilities.

- **At facilities that did separate material, the Carting Company often commingled recyclables with Waste during collection.** OIG found that, contrary to NYC regulations, the Carting Company placed the recyclables and Waste into the same vehicle compartment, a practice that leads to cardboard and paper becoming soiled and potentially making them unsuitable for recycling.

- **The annual amount of cardboard and paper reported as recycled by the Carting Company fell by almost 80 percent between 2018 and 2023.** However, the agency had not detected and investigated the decrease during those years as part of its contract oversight and monthly reviews of the Carting Company's bills. Monitoring recycling levels would have provided the MTA with an opportunity to identify and understand the causes of the dropoff and then address any decreases that were due to improper handling or collection of recyclables.

- **The commingling of recyclables and Waste has significant financial, legal, and environmental consequences.** OIG estimates that NYC Transit could save over $100,000 annually by consistently separating recyclable material at its facilities and by enforcing the terms of the contract. This would bring NYC Transit into compliance with State law and reduce the amount of material sent to landfills by over 600 tons annually.

B. Summary of Recommendations

The failure of NYC Transit personnel to consistently separate recyclable material from Waste and the actions of the Carting Company have reduced the amount of material recycled by NYC Transit. To rectify this, Asset Recovery should use all available tools to scrutinize the Carting Company's bills to ensure their accuracy. Asset Recovery should also ensure that the Carting Company follows the terms of the contract and that all facilities have the containers they need for employees to separate recyclables at the source. This can be accomplished through in-person visits to NYC Transit facilities and observation of the Carting Company's trucks. Lastly, the agency should engage in educational efforts to raise awareness among NYC Transit facility personnel of recycling policies to increase compliance. In a positive development, after

OIG notified senior MTA officials of its preliminary findings in November 2025, the MTA is planning some improvements, specifically strengthening the monthly billing and reporting requirements for the next waste and recycling contract, which was advertised for bid in Spring 2026.

C. Summary of Agency Response

In March 2026, OIG shared its Draft Report with the MTA for comment. The agency said in its April response that it has either partially accepted or fully accepted six of the nine recommendations and disagreed with the other three. The MTA has begun to improve its reviews of monthly bills from the Carting Company and is restructuring the upcoming renewal contract for waste removal services to increase the agency's oversight and controls. The agency agreed to better instruct and train its facility employees in the proper handling of recyclables and on how to report any noncompliance by the Carting Company. The agency also asserted that it has increased its efforts to check that agency personnel properly handle recyclables. The MTA's specific responses are summarized in the Recommendations section at the end of this Report.

II. BACKGROUND

A. Recycling Requirements for the MTA and Carting Companies

Because of the environmental and financial benefits, New York State has enacted laws meant to increase recycling and divert waste from landfills. One such statute is New York State Public Authorities Law Section 2878-B, which requires public authorities to separate recyclable material from Waste at the point where it is generated within their facilities. This "source separation" reduces the likelihood that paper and cardboard could become soiled and unfit for recycling.

While Public Authorities Law Section 2878-B applies to government entities like the MTA, there are New York City regulations that apply to carting companies directly. Specifically, the NYC Business Integrity Commission (BIC) approves licenses for carting companies operating within the city and regulates their activities. One BIC rule holds that carting companies may not commingle source-separated materials for recycling with other waste streams in the same truck compartment.[2] Thus, recyclable material may be placed in the same truck with Waste only if the truck has two separate compartments.

B. Garbage and Recycling Carting Contract Requirements

Since 2013, NYC Transit has relied on the Carting Company to provide waste removal services at over 100 facilities. In accordance with the Public Authorities Law, the contract specifies that NYC Transit personnel will source separate recyclable material, such as paper and cardboard. Additionally, the contract states that the Carting Company will remove recyclables at no cost to NYC Transit. (This stands in contrast with Waste, for which the Carting Company charges a fee for collection and dumping.) Moreover, the Carting Company provides NYC Transit with a credit for recyclable material for each month in which the market price of that material exceeds the cost of processing and marketing the material.[3] Thus, NYC Transit can benefit financially when its employees separate recyclables from Waste, as required by State law and agency policy.

The contract includes several other key requirements. The Carting Company must use a dedicated truck that is capable of picking up recyclable materials. A service-level schedule (Schedule) sets forth the number and types of containers at each facility and the frequency that the Carting Company must service these containers. Pickups are to be performed Monday through Friday and upon request. The Carting Company must submit monthly reports to Asset Recovery, which serves as the project manager for the contract. These reports detail recycling activity, including the number of recycling pickups and the weight of the material collected. In addition, every month the Carting Company must provide weight tickets issued by the waste transfer stations for the dumping of Waste and recyclable materials.

C. The Role of the Asset Recovery Unit

The project manager, Asset Recovery, a group within the MTA Procurement department, is responsible for ensuring compliance with the terms of the contract, acting as an intermediary between agency facilities and the Carting Company, adjusting the collection Schedule for Waste and recycling pickups, and reviewing monthly bills.

---

[2] *See* 17 RCNY § 5-12 Recycling Requirements for Licensees.
[3] This contract does not cover scrap metal, which is collected by another vendor.

D. Waste Hauling Trucks and Containers

Rear load garbage trucks are the type used most often to service NYC Transit facilities.[4] (See Figure 1 for an example of a rear load garbage truck.) These trucks collect recyclables and Waste from roll-around containers, as pictured in Figure 2, which are by far the most common type of container used to hold recyclables at NYC Transit facilities. The contract requires that the Carting Company supply roll-around containers for recyclable material.

Figure 1: Illustrative Example of Rear Load Garbage Truck

AI-generated image

Figure 2: Example of a Roll-Around Container

[4] Roll-off trucks are the other type used to service NYC Transit facilities but rarely collect recyclables.

III. FINDINGS

A. NYC Transit Facilities Did Not Consistently Separate Recyclables from Waste

To evaluate compliance with the contract and determine the current state of recycling at NYC Transit facilities, OIG visited 40 of the 107 NYC Transit facilities that are assigned recycling containers according to the Schedule. OIG considered three factors when deciding which facilities to visit: geography, type of facility, and amount billed for waste removal. This allowed OIG to ensure that the sample included facilities in all five boroughs and covered a range of different types of facilities, from bus depots to maintenance shops. Included in this sample were the 20 facilities for which the agency paid the most in March 2025 on Waste collected from roll-around containers.

Through direct observations and interviews with personnel at the facilities, OIG found that at 21 of the 40 facilities, NYC Transit personnel did not source separate recyclable material from Waste.[5] At these 21 facilities, OIG observed that personnel had placed cardboard and paper into the same containers as Waste. In many cases, the cardboard had become visibly soiled. Figure 3 below illustrates an example of the commingling that OIG observed.

Figure 3: Example of Container with Commingled Material

[5] This figure does not include scrap metal, which is covered by a separate contract.

OIG identified multiple factors that contributed to this outcome. First, OIG found that various misunderstandings and a lack of guidance limited compliance with the contract. For example, personnel at two facilities told OIG that they did not source separate recyclable material because they wrongly believed that the Carting Company was expected to sort out the recyclable material after collection. OIG also found that NYC Transit had not created any policies, procedures, on-site signage, or programs to educate personnel on recycling requirements.

Many facilities also did not have the recycling containers that the Carting Company should have provided as per the Schedule, and therefore the facilities may have been hindered from effectively source separating recyclable materials. Of the 40 facilities OIG visited, at least seven were missing some or all the recycling containers they should have had.

In addition, insufficient labeling on the containers may have contributed to lower levels of recycling. NYC Transit is responsible for providing and affixing recycling labels on all recycling containers to differentiate them from containers for Waste. At 23 of the 40 facilities visited by OIG, none of the containers had labels to designate them for recycling. Without labels, personnel may not have known which containers should be used for recycling, leading them to mix cardboard and paper with Waste.

B. Carting Company Commingled Recyclables with Waste

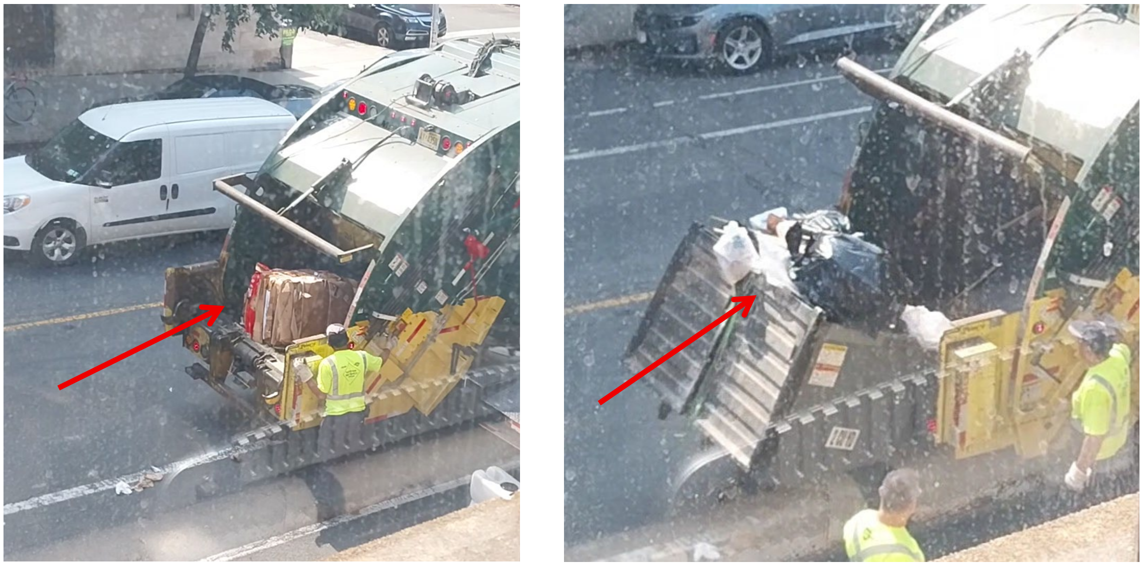
OIG found that at 19 of the 40 facilities it visited where NYC Transit personnel were source separating recyclable material, the Carting Company was combining the recyclables with Waste. OIG discovered, based on direct observations, interviews, and document reviews, that when the Carting Company picked up recyclables at 17 of these 19 facilities, the Carting Company used the same rear load truck to pick up both the recyclables and Waste on the same routes.[6] Importantly, these trucks do not have two separate compartments.

For example, at one facility, OIG auditors witnessed Carting Company personnel place source-separated cardboard into their truck and then place Waste into that same truck. Figure 4 below shows screenshots of the video that OIG captured of this activity.

---

[6] At the 18th facility OIG visited, the Carting Company did not recycle cardboard placed in an open-top container. The 19th facility used a compactor to prepare its cardboard for pick up, and this facility's cardboard was apparently recycled by the Carting Company.

Figure 4: Screenshots of Carting Company Personnel Loading Cardboard (left) and Waste (right) into Same Truck at an NYC Transit Facility



In another instance, officials at the NYC Transit Print Shop, which generates a large amount of paper waste, told OIG that the truck that collects recyclable paper also collects Waste at the same time. Subsequently, OIG obtained surveillance video that shows the Carting Company workers placing several hampers of recyclable paper into the truck and then placing facility Waste into that same truck (see Figure 5 below for screenshots).

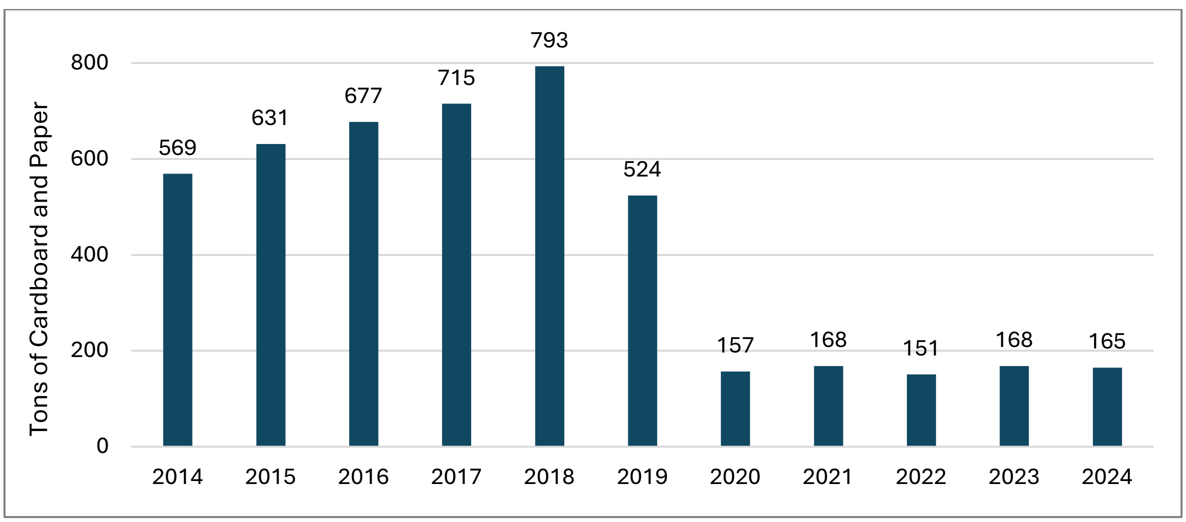
Figure 5: Screenshots of Carting Company Personnel Loading Paper (left) and Waste (right) into Same Truck at Print Shop

The fact that the Carting Company commingled recyclables and Waste from the facilities serviced by single-compartment, rear load garbage trucks is quite troubling because almost all agency locations assigned recycling containers – 104 out of 107, or 97% – were serviced by these trucks. The Carting Company's behavior is in violation of its contractual requirement to comply with laws and regulations, which in this case require separation of recyclables from Waste.

C. Sharp Decrease in Reported Recycling

The amount of recycling that the Carting Company reported changed radically over the years of the contract. Figure 6, below, shows how much recycling was reported by the Carting Company to Asset Recovery via its invoices since 2014, the first full year of providing service to NYC Transit. Recycling initially increased annually from 2014 to 2018, from more than 500 tons to nearly 800 tons. The relatively high level of recycling reported during this period demonstrates that there was significant cardboard waste produced from operations and that NYC Transit was capable of diverting it from the waste stream. Notably, the volume dropped significantly in 2019 and again in 2020 and then remained low. The Carting Company only reported 165 tons of recyclables in 2024, compared to 793 tons in 2018. This is almost an 80% drop in recycling volume.

Figure 6: Tons of Cardboard and Paper Recycled Per Year, 2014-2024



Possible causes of this significant decrease are addressed in the following Finding.

D. Contract and Facility Monitoring Was Insufficient

OIG found that Asset Recovery did not sufficiently monitor NYC Transit's contract for the pickup and handling of recyclables. OIG identified several opportunities for Asset Recovery and facility management to tighten oversight of the contract to ensure that the Carting Company stops commingling recyclables with Waste and provides NYC Transit with the appropriate financial credit.

1. Contractual Compliance

Asset Recovery did not sufficiently use the monthly billing details to identify and challenge the Carting Company's lack of adherence to the terms of the contract, specifically the frequency of collection and the volume of materials recycled. For example, for each day of recycling pickups, there should be at least one corresponding recycling dump. The contract specifies that the Carting Company must pick up recyclables five days a week, but the monthly bills from 2021 to 2024 showed that recycling was only dumped, on average, approximately once per week. For instance, the Carting Company reported only 50 recycling dumps in 2024 and 46 in 2023.

The volume of collected recyclable material reported annually by the Carting Company in 2023 and 2024 was far less than both the estimate in the contract and, as illustrated in Figure 6, the amount collected yearly between 2014 and 2018. The contract estimates that the Carting Company should collect 576 tons of recyclables a year from the facilities. Between 2014 and 2018, the average annual amount collected was 677 tons. However, the Carting Company reported collecting just 168 tons in 2023 and 165 tons in 2024. Yet OIG found that Asset Recovery had not identified in its bill reviews the decrease in both the number of pickups and the volume of recyclables collected.

While seeking to identify the causes of these decreases, OIG found that Asset Recovery had not used its authority under the contract to verify the Carting Company's performance by accompanying its trucks on their rounds. Doing so would enable Asset Recovery to quickly determine which locations are not being serviced as required by the contract and the Schedule.

OIG also learned that Asset Recovery did not regularly check that facility personnel use designated containers to source separate recyclables from Waste. Further, Asset Recovery could do more to verify that each facility has the proper number of containers listed in the Schedule. Asset Recovery personnel conduct Refuse and

Recycling Assessments, in which they visit a site and record the number of containers and their condition. Asset Recovery officials told OIG that they try to visit each site at least once every five years. However, between 2019 and 2024, officials only conducted assessments of 13 of the 107 facilities. Asset Recovery officials asserted that the unit had struggled to conduct these assessments because the main staff member responsible for monitoring the contract left in 2022 and had not been replaced. These monitoring duties were added to another staff member's responsibilities. However, the low number of assessments occurred over a period that began before the original staff member left. OIG also found that Asset Recovery could verify the numbers of containers at facilities through other means. Specifically, by accompanying the Carting Company's trucks, Asset Recovery could identify which locations do not have containers for recycling.

Lastly, OIG found that while the Carting Company gives Asset Recovery hard copies of the recycling weight tickets every month, the Carting Company does not electronically provide the critical information on the tickets, including the dump date, time, and truck number, as required by the Technical Specifications section of the contract. With an electronic version of the information in a format compatible with software such as Microsoft Excel, Asset Recovery would be able to efficiently determine whether the weight tickets confirm that the Carting Company picked up recycling on each weekday as scheduled. This would also enable Asset Recovery to quickly compare the information on the recycling weight tickets with the Waste weight tickets to identify instances when recyclables and Waste were commingled in the same truck.

2. Facility Communication

Asset Recovery could better empower facility personnel to notify them when the Carting Company is not complying with the recycling requirements of the contract. Notably, OIG found that NYC Transit personnel in at least 6 of the 17 source-separating facilities serviced by rear load garbage trucks had observed Carting Company employees place recycling and Waste in the same truck. When OIG auditors asked Asset Recovery officials about this, they said that they do not recall facility personnel ever reporting this activity.

OIG also found that facility personnel did not know when the Carting Company should collect recycling and therefore could not have known to inform Asset Recovery when recycling pickups were missed. Additionally, none of the personnel with whom OIG spoke with at the 40 sampled facilities knew how many containers their facility should have according to the Schedule.

E. Financial, Legal, and Environmental Impacts Are Significant

1. Financial Impact

OIG estimated the annual financial impact of the commingling of NYC Transit's recyclables and Waste. There are two components to this impact: First, the agency could receive additional credit from the Carting Company by recycling more material. Second, NYC Transit could realize significant savings by reducing the additional pickup and dumping costs incurred when recyclables are mixed with Waste. According to the contract, NYC Transit pays the Carting Company to pick up material from containers designated for Waste, but it should not pay for the pickup of material in recycling containers. Diverting recyclables from waste containers and ensuring separate collection would result in fewer paid pickups. Likewise, NYC Transit also pays to have Waste dumped based on its weight, but it should not pay to have recyclables processed. Ensuring that all recyclables are collected separately from Waste would result in less material being dumped and would therefore lower the dumping fees.

OIG estimated how much NYC Transit could have saved under two scenarios: (1) if it had recycled the volume that was estimated in the contract and (2) if the volume during 2023 were the same as the Carting Company had reported in 2018, a date prior to the precipitous drop in reported tons recycled shown in Figure 6.[7]

[7] OIG calculated the impact as if these volumes were achieved with the 2023 rates for services and recycling credits.

The analysis shows that the total financial loss to NYC Transit from the improper handling of recyclable materials ranged from approximately $107,000 to $158,000 annually (see Figure 7 below).

Figure 7: Estimated Annual Financial Impact of Improper Handling of Recyclable Materials
(based on 2023 contract rates)

	Based on 2023 Actual Volume	Alternative Scenarios: #1: Based on Contract-Estimated Volume Applied to 2023 Rates	Alternative Scenarios: #2: Based on 2018 Actual Volume Applied to 2023 Rates
Tonnage of recycling	168	576	793
Cardboard and paper recycling receivable **credit**	$6,903	$29,721	$36,747
Savings from not paying to dump recyclables	$14,465	$49,536	$68,220
Savings from reduced Waste pickups	$20,212	$68,849	$94,923
Total Savings (savings plus credit)	**$41,581**	**$148,105**	**$199,890**
Potential savings above 2023 volume		**$106,525**	**$158,309**

Source: OIG analysis using contract and invoice data

If the agency and the Carting Company had been able to maintain the volume of recycling reported in 2018, OIG estimates that NYC Transit could have saved almost $800,000 in waste removal costs during the five-year period from 2020 to 2024.

2. Legal and Environmental Impact

By failing to consistently source separate paper and cardboard, NYC Transit violated Public Authorities Law Section 2878-B. This improper handling of recyclables creates an environmental cost because paper and cardboard that have been mixed with Waste are likely to become soiled, preventing the material from being recycled.

Adding to this problem is that the Carting Company commingled most of the recyclables that agency personnel did source separate. Section 5-12 of Title 17 of the Rules of the City of New York states that “a licensee collecting materials that have been source-separated by the customer may not commingle in the same vehicle compartment” recyclable material and Waste. OIG observations confirmed that the Carting Company used trucks with only one compartment, meaning that any source-separated recyclables would be commingled with Waste in that same truck. Moreover, the contract states that the Carting Company must comply with applicable laws and regulations.[8] Therefore, the Carting Company violated both the contract and NYC regulations.

IV. RECENT DEVELOPMENTS

OIG has had conversations with the MTA on how to best address concerns about NYC Transit’s recycling program and the Carting Company’s performance. On November 5, 2025, OIG staff briefed senior MTA officials regarding preliminary findings and recommendations. On February 13, 2026, the MTA shared with OIG a draft scope of work for the next waste and recycling removal contract, which was then advertised for bid on April 22, 2026. As laid out in the draft scope of work, the MTA plans to require the contractor to include in its monthly bills and reports the following information for every pickup: the location, date of service, arrival and departure times, quantity and volumes of containers serviced, license plate number, and truck number as well as the weight of the materials collected, if available. The agency may also require GPS data to support the billed pickups. In addition, the MTA will require the contractor to inform the agency of any commingling of recyclables with Waste in containers serviced at agency facilities.

The MTA also held a Special Responsibility Hearing with the Carting Company in May 2026, during which the company was asked to respond to MTA and OIG observations that recycling was commingled with Waste. Subsequently, the Carting Company admitted that it did not provide a dedicated recycling truck to collect recycling as required by the contract; instead, their employees put recycling and Waste into the same rear load truck. In some cases, the company said their driver would estimate the weight by visually gauging the amount of recycling but also acknowledged that other drivers did not even take that step. The company stated that it will try to estimate the impact of this deviation from the contract.

[8] Section 48 of the contract’s Terms and Conditions.

OIG will refer this report's finding that the Carting Company commingled recyclables with Waste to the MTA and the appropriate regulatory authorities. A second OIG audit on the Company's performance and billing practices will be publicly reported at a later date. Regarding MTA operational procedures and oversight of its recycling program, OIG provides nine recommendations below.

V. RECOMMENDATIONS

To improve its monthly bill reviews to better determine whether the Carting Company is violating the contract, Asset Recovery should:

1. Establish detailed procedures for more thorough reviews of the Carting Company's monthly bills, including ensuring that the number of weight tickets from recycling dumps aligns with the schedule of recycling pickups.

   Agency Response: The MTA partially agreed with this recommendation. The agency stated that "for the current contract … if we determine that the Carting Company performs recycling dumps, MTA Procurement will ensure steps are in place to confirm that they are aligned with the pickup tickets. Moving forward, the new contract … has been designed to avoid such discrepancies by requiring the vendor to determine the quantity of waste and recyclables at pickup. By documenting pickups with time-stamped photographs of the number of containers with waste or recyclables picked up at each location, we can confirm the billing is correct. Dump tickets will not be a factor in billing going forward because there will no longer be a payment/recovery for recyclables. Instead, recyclables will be hauled away at a reduced rate."

   OIG Comment: In May 2026, the agency provided OIG with copies of detailed procedures for more thorough reviews of monthly bills under the current contract. The agency was also drafting procedures for the renewal contract. OIG believes these actions address the recommendation.

2. Require the Carting Company to comply with the contract by providing all information on the weight tickets electronically, including the information on the recycling weight tickets.

   Agency Response: The MTA agreed with this recommendation. The agency stated that the new contract "will require the vendor to provide electronic billing that includes all information on weight tickets … The new contract solicitation is [also] requesting the vendor provide access to vehicle GPS logs."

To improve its oversight of facility practices and the Carting Company, Asset Recovery should:

3. Establish a protocol and schedule to periodically check whether each facility has enough containers to hold the recyclables generated by that facility.

   Agency Response: The MTA stated that it disagreed with this recommendation. The agency asserted that "Asset Recovery staff already has an established protocol and inspection schedule in place. NYCT facilities are assessed at least once every three to five years or as needed between assessments. These assessments include a review of the condition and availability of containers. The Asset Recovery Project Manager also relies on facility personnel to communicate their operational needs to ensure timely adjustments of the number of containers. We anticipate the planned increase in signage will also encourage reporting or requests for additional containers."

   OIG Comment: OIG notes that during the audit, Asset Recovery provided no written protocols on the inspection program. Additionally, as noted above, the agency only conducted assessments of 13 of the 107 facilities over a six-year period. Still, OIG is encouraged that MTA officials recently provided OIG with written protocols and inspection schedules for agency personnel to check that NYC Transit facilities have the required recycling containers. OIG believes this addresses the recommendation.

4. Establish a protocol and schedule for visits to locations with recycling containers to ensure the containers are properly labelled.

   Agency Response: The MTA stated that it disagreed with this recommendation. The agency asserted that the "MTA already has a protocol for visits to locations with recycling containers to ensure the containers are properly labelled. Current Facility Assessment procedures include on-site verification that containers are appropriately labeled, and Asset Recovery staff affix decals as needed to ensure accuracy and consistency. In the pending solicitation, the new vendor will be required to affix durable, hard-to-remove labels on all containers."

   OIG Comment: During the audit, agency officials did not provide any written procedures or protocols that covered the topic. Additionally, as noted above, officials conducted only a few assessments over a six-year period. Still, OIG is encouraged that MTA officials recently provided OIG with written protocols and inspection schedules for agency personnel to check that the recycling containers at NYC Transit facilities are properly labelled. OIG believes this addresses the recommendation.

5. Post signs on or near containers stating their designated use, the number of containers that should be in that area, and the days of the week they are supposed to be serviced. The signs should also include Asset Recovery's contact information for employees to use when either agency personnel use the waste or recycling containers improperly or the Carting Company is not meeting the posted service. Asset Recovery should also implement a procedure to ensure that these signs are updated when the facility's service schedule changes.

   Agency Response: The MTA partially agreed with this recommendation. The agency stated that the "MTA is already developing signs that provide general information, including contact details and a QR code for the Asset Recovery intranet page for employees to report issues and to obtain scheduled service changes. In addition, as per [Department of Sanitation] DSNY regulations, the contractor is to provide stickers at each facility indicating the days of the week refuse and recycling services will be provided. We do not agree that the MTA should be required to change the signage each time there is a service schedule change, given the number of locations and the frequency of service changes."

6. Develop a program to use overt and covert methods to periodically check facility practices and Carting Company collections to ensure that (a) NYC Transit personnel separate recyclables and (b) Carting Company employees do not place recyclables in the same truck as Waste.

   Agency Response: The MTA stated that it partially agreed with this recommendation. The agency asserted that "the existing program includes the use of overt and covert methods to check facility practices and collections on a sample basis. We will reevaluate our sampling method by continuing to review the rationale, intervals and locations of future samples. As for employee facilities, in coordination with the MTA Sustainability Group, we will refresh signage and take other corrective measures described above to better inform employees of the need to separate waste. We will also remind facilities personnel to report issues to Asset Recovery."

   OIG Comment: OIG is encouraged that subsequent to the formal agency response, the MTA shared written procedures for checking that agency personnel keep recyclables separate. In addition, agency officials described to OIG how personnel have started to check that the contractor does not commingle recyclables and Waste.

To improve facility personnel's recycling-related efforts and oversight at its facilities, NYC Transit should:

7. Re-instruct its facility personnel to separate recyclables and Waste at the source and how to do so.

   Agency Response: The MTA stated that it agreed with this recommendation. The agency explained that multiple efforts are currently underway, including new signs, instructions on the MTA intranet, a training module with certification, and an outreach campaign to reinstruct personnel.

8. Assign a person to be responsible for overseeing recycling compliance at each facility.

   Agency Response: The MTA stated that it disagreed with this recommendation. The agency stated that "at this time, we cannot commit to assign recycling compliance to a single person at each facility. The majority of our facilities are comprised of multiple divisions, departments, unions and onsite contractors. However, we recognize the need to address compliance and are considering a few options including evaluating how we can add recycling compliance responsibilities to existing job descriptions."

9. Require facility personnel to notify Asset Recovery when a scheduled recycling pickup is missed or if someone observes the Carting Company commingling recyclables with Waste, and instruct the personnel about this responsibility.

   Agency Response: The MTA stated that it partially agreed with this recommendation. The agency referred to its response to Recommendation 8 above and added that "while we will not require personnel to notify Asset Recovery of commingling recyclables with waste or missed pickups, we will be adding signage informing [agency personnel] … of proper disposal and how to report issues related to missed pickups or commingling of waste."

   OIG Comment: While not requiring personnel to report noncompliance – the main point of this recommendation – NYC Transit will still inform facility personnel of the procedures for proper disposal and the reporting of noncompliance with recycling and pick up requirements. Further, as mentioned in the MTA's response to Recommendation 8, the agency is evaluating how it can add other recycling compliance responsibilities to existing job descriptions.