



November 21, 2021

U.S. Environmental Protection Agency
EPA Docket Center
Superfund Docket
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

To whom it may concern;

The Newtown Creek Alliance (NCA) is a community-based organization dedicated to restoring, revealing and revitalizing Newtown Creek. We partner with local groups, individuals, and commercial and industrial community members with the goal of ensuring the improved health of Newtown Creek and its surrounding communities. We are actively fighting for environmental justice and equity for our community, centering the cleanup of existent contamination and cessation of illegal dumping to promote human and ecological health. **We support the addition of the Meeker Avenue Plume site (EPA-HQ-OLEM-2021-0461) to the National Priorities List and their designation as a federal Superfund site under CERCLA**, as both are critical steps towards safe and healthy communities in Greenpoint and East Williamsburg.

We are deeply concerned by the toxic plumes commingling with soil and groundwater, beneath the homes and businesses in our community and the risk they pose to human health. After discovering the Greenpoint Oil spill in 1978, it wasn't until community members and environmental nonprofits began taking legal action demanding that polluters including ExxonMobil be held responsible for the oil they dumped into the Creek that a robust cleanup initiative finally began—nearly 25 years later. It was during this oil spill's cleanup that the plumes were discovered in 2005, and in the 16 years since then there have only been piecemeal, incongruous remediation efforts made to improve living and working conditions atop the plumes. **These efforts**, while welcome by the individual businesses and residents they support, **have not led to any comprehensive or serious action towards cleanup.**

These plumes are the result of historic dry-cleaning, metalworking, businesses dumping hazardous waste and engaging in irresponsible manufacturing practices for decades. The New York State Department of Environmental Conservation (DEC), in cooperation with the New York State Department of Health (DOH), began investigating the Meeker Ave. Plumes in the Spring of 2007 after results from two separate investigations conducted by the ExxonMobil Corporation and the New York State Department of Transportation documented that soil, soil gas, and groundwater at numerous locations throughout the area had been contaminated with chlorinated solvents. The primary contaminants of concern are cis-1,2-dichloroethylene (DCE); tetrachloroethylene (PCE), trichloroethylene (TCE), and vinyl chloride. **These highly toxic volatile organic compounds are diffusing into our homes and businesses, posing great health risks to our community members and neighbors. This crisis needs to be seriously addressed.**



In our conversations with DEC, representatives have acknowledged that given the scale, complexity, and potential remedial cost of the contamination, the Meeker Avenue Plumes require greater oversight than New York State can offer. The scale of this problem requires supervision and management from the Environmental Protection Agency (EPA). We applaud DEC's nomination, and support the move to bring the Plumes under Federal investigation and oversight.

The Newtown Creek waterway and its surroundings have been continuously poisoned for over 150 years by unregulated and unchecked industrial use. As a result, our communities surrounding the Creek have been cut off from this once pristine and productive natural resource for generations. The Meeker Avenue Plumes fall into both New York State¹ and New York City Environmental Justice Areas²; an acknowledgement that for too long our communities have lived in close proximity to hazardous industrial pollution, while being excluded from due process. These neighborhoods in Greenpoint and East Williamsburg have disproportionately been a site of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies³ and seek a righting of these historical wrongs. Moving to prioritize the cleanup of the Meeker Avenue Plumes is a critical step in remediating the historical wrongs that have been done to the land and the people that live in and around Environmental Justice areas.

For these reasons, we submit this comment letter in strong support of the addition of the Meeker Avenue Plume site (EPA-HQ-OLEM-2021-0461) to the National Priorities List and its designation as a federal Superfund site under CERCLA.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Elkins", written over a horizontal line.

Willis Elkins
Executive Director
welkins@newtowncreekalliance.org
347-504-6701

¹ New York State Environmental Justice Areas, [ArcGIS map](#) accessed Nov. 20, 2021.

² New York City Environmental Justice Area, [ArcGIS map](#) accessed Nov. 20, 2021.

³ EPA Environmental Justice [definition](#). Site visited Nov. 4, 2021.