

November 30, 2021

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

**RE: Proposed Addition of Meeker Avenue Plume to the National Priorities List (NPL)
[Docket ID: EPA-HQ-OLEM-2021-0461]**

To Whom It May Concern:

On behalf of North Brooklyn Neighbors (NBN), we appreciate the opportunity comment on the proposed addition of the Meeker Avenue Plume to the National Priorities List. As a local community organization with deep interests in raising awareness about environmental hazards and mitigating legacy toxins, we fully support the addition of the Meeker Avenue Plume to the National Priorities List and urge the EPA to adopt the proposed rule.

Our New York City neighborhood is beset with environmental issues from the legacy of industry. Already our small area is burdened with the Newtown Creek Superfund site, state Superfund sites, numerous Brownfields, and a host of other environmental concerns. Through our struggles as a community, we have developed a great deal of institutional knowledge, experience working with the NYS Department of Environmental Conservation (NYSDEC), and a cadre of committed activists who take the lead in protecting the health of all residents.

Yet the extent, toxicity, cost, and complexity of the Meeker Avenue Plume have been shown to be beyond the capacity of our local community, or even our state agencies, to deal with. As the NYSDEC itself suggests, the EPA is better equipped to deal with the complex subsurface conditions, which already involve six Class 2 sites on the State's Registry of Inactive Hazardous Waste Disposal Sites, with further discoveries anticipated.

The Meeker Avenue Plume is located within a potential environmental justice area¹ and, unlike many of other sites, lies directly beneath areas zoned for industrial uses as well as residential housing and parks. It is also proximate to elementary schools and a large public housing campus and has a higher concentration of residents who are lower income, recent immigrants, living in a public transportation desert. As local community advocates, we regularly hear from concerned renters whose health is potentially at risk when landlords, fearful of evidence of harm, refuse to test for vapor intrusion in their residences.

¹ Map of NYC's Environmental Justice Areas,
<https://nycdohmh.maps.arcgis.com/apps/instant/lookup/index.html?appid=fc9a0dc8b7564148b4079d294498a3cf>

Chlorinated volatile organic compounds, including TCE and PCE, are often discovered at highest concentrations in a building's lower levels. Many small residential buildings in the investigation area are divided into multiple apartments, increasing the likelihood of exposure to those with living quarters at basement or ground levels. Pandemic shutdowns increased the number of residents living, working, or attending school in these spaces and may have impacted the likelihood of exposure. The neighborhood includes hundreds of homes with small yards and many of them are used for planting, growing food, or children's play areas. These activities present potential exposures such as skin contact with TCE², consuming soil particles, and inhaling soil dust that pose serious health risks.

The confluence of all these factors means residents are likely to suffer direct harm, both acute and chronic, from failure to adequately address the hazards posed by the Meeker Avenue Plume.

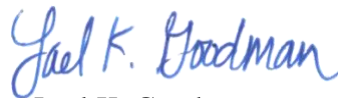
We ask for the EPA's help in fully assessing the risks and taking mitigating measures to ensure that the residents and workers exposed to harmful vapors are protected by adding the Meeker Avenue Plume to the National Priorities List.

Thank you for considering our comments and appreciate the opportunity to share our perspective. We look forward to your responses.

Sincerely,



Anthony Buissere
Executive Director



Lael K. Goodman
Environmental Justice Program Manager

² Reusing Potentially Contaminated Landscapes: Growing Gardens in Urban Soils,
https://www.epa.gov/sites/default/files/2014-03/documents/urban_gardening_fina_fact_sheet.pdf