



Community Board 12 - Manhattan Washington Heights & Inwood

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Richard R. Lewis, Chairperson
Ebenezer Smith, District Manager

June 21, 2019

Mr. Steven Wu
Project Manager
N.Y. State Department of Environmental Conservation
47-40 21st Street
Long Island City, NY 11101-5401

Re: BCP Site ID: C231131

Dear Mr. Wu:

We are writing in regard to the Brownfield Cleanup Program (BCP) application and Draft Remedial Investigation Work Plan for the site at 4778 Broadway, Manhattan. Thank you for granting us an extension to submit these comments.

As the Community Board representing the area where this site is located, we are interested in working with you to ensure that it is fully remediated in a satisfactory manner with the least possible impact on the community. The contamination previously found on the site – in the soil, groundwater and soil vapor – is of great concern to us, especially considering its prime location on the most heavily trafficked street in the community, next to a public library and a school, and near numerous residences, businesses and a medical facility.

Here are our comments:

- 1) A thorough investigation is needed to determine whether the seven underground storage tanks of petroleum that were on the property as of 1996 still remain there since AEI Consultants points out that they pose "a potential concern for vapor-phase migration." In its 2017 investigation, AEI identified an area where one of them might be located but did not confirm whether it is in fact there. A more extensive subsurface investigation should be conducted in this area and throughout the site to try to locate all seven USTs.
- 2) If these USTs are found, a plan must be developed for properly closing them and removing them from the site.
- 3) Since USTs apparently were located on this site as far back as 1921, it appears very possible that contaminated soil vapor already may have escaped from the site and penetrated into adjacent properties. The remedial investigation also should address this question.

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- 4) AEI's report of its 2017 subsurface investigation indicates that an indoor air sample was collected inside the building. Was this sample ever analyzed, and if so, what were the results? Indoor air samples should be taken and tested as part of the new investigation.
- 5) Removal of the waste from the site and the drilling on site should be scheduled during times when students are not on their way to or leaving school.
- 6) Trucks that are removing the waste should take the quickest and most direct route out of the community.
- 7) The company performing the intrusive drilling operations should ensure that dust is kept out of the Inwood Branch Library and I.S. 52 and should work with them to take appropriate precautions.
- 8) The results of the Community Air Monitoring should be provided to Community Board 12, especially in any instance in which exceedances of action levels are detected. We should be informed of any actions taken to alleviate these conditions.
- 9) Since the subsurface work could disturb rat habitats, rodent abatement measures should be included with the investigation work.
- 10) Signage should be posted so the public is aware of the work being conducted on the site.

Thank you for your consideration of these comments. We look forward to receiving your responses.

We assume that we will receive the results of the remedial investigation and will have an opportunity to offer additional comments at that time.

We would appreciate being kept fully informed throughout this process, which hopefully will result in the complete cleanup of this site in an appropriate manner sensitive to the needs of this community.

Sincerely,



Richard Lewis
Chair, Community Board 12, Manhattan

N.B.: Prepared by Steve Simon
Chair, Health & Environment Committee

cc: Borough President Gale Brewer
Congressman Adriano Espaillat
State Senator Robert Jackson
Assembly Member Carmen De La Rosa
Council Member Ydanis Rodriguez