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Manhattan Community Board 1

Re: 250 Water Street Remediation

Dear Sir / Madam:

Several years ago, I was asked by a member of the Peck Slip School to assist in understanding the risks associated with the site known as 250 Water Street. As a Professor of Environmental Health and a lifetime New Yorker, I was keen to offer my assistance to the community to ensure future proposals to remediate the site protect residents and children alike. I was provided with the draft remediation plan for this site and attended the virtual meeting on Monday night (Feb 22). Given the limited time for feedback, I'm writing today with some urgent messages and requests.

First, be advised that this site contains many more chemical hazards than mercury. I am well aware of the mercury hazard and assisted the school in taking indoor air samples for mercury vapor as well as perimeter soil samples. However, when I reviewed the report, it was quite striking that mercury may be the <u>least</u> of the communities potential chemical exposures. There are numerous very hazardous chemicals with a number of serious adverse health impacts. There are dozens of chemicals including; irritants, neurotoxins, renal toxicants, carcinogens and teratogens. Essentially the chemicals discovered in the soil, soil-vapor and groundwater are a who's who of environmental toxicology. I was quite surprised to read that even DDT was discovered. I urge you to peruse sections 5.4 Soil Findings, 5.5 Groundwater Findings and 5.6 Soil Vapor Findings. The listing of chemicals discovered raises many public health warnings.

Second, keep in mind that what has been reported is a result of selective sampling; often a dozen or so sites or wells. The full picture of contamination is not known and I would say, additional sampling would only validate existing findings and perhaps report even higher levels. Given what has already been discovered, I suspect pockets of high level contamination may exist.

Thirdly, as an exposure assessment specialist, my true concern is the removal of the relatively impermeable asphalt cap. To some extent the site has been protected and preserved from the environment with the contaminants kept in place being allowed to migrate. Once construction begins and the cap is removed and the soil disturbed, then community exposure will begin. Careful and serious considerations need to be in place to ensure the site is not off-gassing hazardous agents.

Lastly, I am also particularly concerned that the remediation may proceed without a clear indication of future land use. Removing hundreds of tons of contaminated soil and simply leaving an open hole in the ground is simply poor judgement. Redevelopment should proceed immediately following remediation and ensure any structure is environmentally compliant and protects human health and the environmental to the highest standards. We're all aware of

stalled building projects in the New York metropolitan area that produce abandoned building lots and all the risks associated. Conversely, simply filling then recapping the site to only have to demolish that temporary measure at a later date unnecessarily exposes city residents and school children to another round of toxins and dangerous, disruptive construction. I urge your community to insist on an approved redevelopment plan with immediate construction afterwards.

I have more to say on this matter and would be happy to address you further or be a resource to the community. Thank you for the opportunity to provide my thoughts and best wishes

Sincerely yours;

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