

**Making an Organizational Public Comment to the New York State Department of Environmental Conservation on the former American Axle Site's Remedial Investigation Work Plan (Contamination Sampling Plan)**

**What are you commenting on?** You are submitting a public comment on the Remedial Investigation Work Plan, or RIWP, for the former American Axle site in the Delevan Grider community in Buffalo. The RI is the plan to investigate how dangerous the site is to human health and the environment. The RIWP describes how the owner will test the site to determine the levels of toxins and geographical location of the contamination and suggests how the owner will remediate it. This is one phase in the process of cleaning up the site.

**Who are you commenting to?** You are writing a comment to the site manager at the New York State Department of Environmental Conservation (DEC). This is the agency that oversees environmental remediation programs in our state.

**Why is this important?** The RI is an important step in the remediation process. Finding where and how concentrated the waste is will determine if it will be removed, *or* if it will be capped and buried. If no one knows about it, they can't remediate it. The more people that show concern means that the DEC needs to pay more attention.

**How to comment:** Comments can be submitted by mail to the site Project Manager Eugene Melnyk at 270 Michigan Avenue, Buffalo, NY, 14203; via email [eugene.melnyk@dec.ny.gov](mailto:eugene.melnyk@dec.ny.gov); or by calling 716-851-7220. Make sure you include the site number and the address of the site.

**Comments must be submitted by the deadline, 5pm on Monday August 24th 2020.**

**For more information on the remediation process visit**

[www.cacwny.org/get-involved/hazwaste/](http://www.cacwny.org/get-involved/hazwaste/)

[For a link to the NYSDEC's fact sheet click here.](#)

[For a link to the NYSDEC's documentation on this application click here.](#)

**Sample Comment:**

**To:** [eugene.melnyk@dec.ny.gov](mailto:eugene.melnyk@dec.ny.gov)

**Subject:** Site Number:C915196B 1001 East Delavan Avenue Site Brownfield Cleanup- Remedial Investigation Work Plan

Dear Mr. Melnyk,

I am writing to submit comments on the Remedial Investigation Work Plan for Site Number C915196B: Brownfield Cleanup at the site formerly known as GM/American Axle and Manufacturing (GM/AAM).

I submit these comments on behalf of (Organization Name). (Organization Name) is (add in mission, reach and values of organization).

The American Axle site located at 1001 East Delavan Ave. is known to be significantly contaminated. Approximately 110 thousand gallons of PCBs are located underneath this site. PCBs, known carcinogens, were found to be leaking into the sewer that flows under community members homes. Families are afraid to drink their water and plant gardens in their backyards.

Due to the significant history of soil contamination on this site, I am particularly concerned about the potential for groundwater contamination. Buffalo City sewers also run underneath this site, homes in the community, and flow into the Scajaquada Creek. Some metals mentioned in the plan, lead and arsenic for instance, exceed New York State standards for groundwater. As a resident in the community, groundwater in Buffalo is a serious concern to our health. The Remedial Investigation must comprehensively investigate for lead and other metals on this site, as well as investigate off site potential avenues for offsite contamination.

I am concerned that this work plan only includes a portion of the site. It is unclear whether the implementation of this work plan will result in remediation necessary for the long-term protection of human health and the environment. Specifically, the site has been arbitrarily carved out of the group of sites once operated by GM and American Axle which includes the Colorado Street site and the Saginaw sites. Although these are separate sites than what is in the application, they also may have a community impact. I believe it to be in the community's best interest to group these sites together in a regional effort. By approaching this group of sites as a whole, this sort of assurance by NYSDEC will be comforting to nearby residents and is sure to gain support for NYSDEC decisions in the future.

This site has harmed the community for over 30 years. We appreciate the NYSDEC's commitment to getting it cleaned up. This work plan is more thorough due to oversight by NYSDEC. However, it is clear the NYSDEC has struggled to enforce timely and thorough remediation over the past two decades. In addition to my support of Clean Air Coalition and nygeology's comments on this Brownfield Remedial Investigation Work Plan, I also strongly urge the NYDSEC to create a Community Advisory Board that would allow residents and community stakeholders to partner with NYSDEC and the site owner for comprehensive remediation that the community deserves. A Community Advisory Board would help the DEC with extra eyes to make sure the implementation of this work plan is timely and thorough. We all want the same outcome- a healthier community.

Respectfully submitted,

**NAME**

**Title**

**Organization**

**Address**

**Email or phone number**

