Columbia Smelting and Refining Works Site

Community Involvement Plan

Spring 2016

Prepared by EPA Region 2

Community Involvement Plan (CIP)

Preface

The U.S. Environmental Protection Agency (EPA) is pleased to release this Draft Community Involvement Plan (CIP) for the Columbia Smelting Removal Project, which is considered a "time-critical removal" – a type of fast-paced cleanup action under federal Superfund law. The EPA has determined that a time-critical removal action is appropriate to prevent, minimize, stabilize, or eliminate threats from lead-contaminated soil to human health and the environment.

The EPA's community involvement activities at the Columbia Smelting Site (Site) are designed to inform the public of the nature of the environmental issues associated with the Site, involve and include the public in the cleanup process that will affect them, and inform the public of the progress being made to implement the cleanup. This CIP provides a toolbox of options for keeping the public informed and for soliciting input. The EPA is committed to active and open public involvement throughout the life of this project.

Please contact Natalie Loney with your comments, concerns, and questions regarding the CIP, so that we may continue in a partnership of meaningful public participation, involvement, and dialogue. Natalie can be reached at 212-637-3639 or via email at loney.natalie@epa.gov.

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1. Overview

Purpose of the Community Involvement Plan

The U.S. Environmental Protection Agency (EPA) developed this Community Involvement Plan to facilitate two-way communication between the community in proximity to the Columbia Smelting Site and the EPA, and to encourage community involvement in the Site activities. This Community Involvement Plan (CIP) describes a range of suggested community involvement and outreach tools and activities that have been identified by the EPA in consultation with key stakeholders. Not all of the tools and activities will necessarily be implemented. Rather, the tools and activities identified here will be implemented based on input from stakeholders and in consideration of a number of project management and community factors.

This CIP does not attempt to prescribe where, how or when each tool and activity will be used. Specific information on the major project documents, decisions, and activities will be provided to the public through fact sheets, project websites, and electronic notices, to name a few ways.

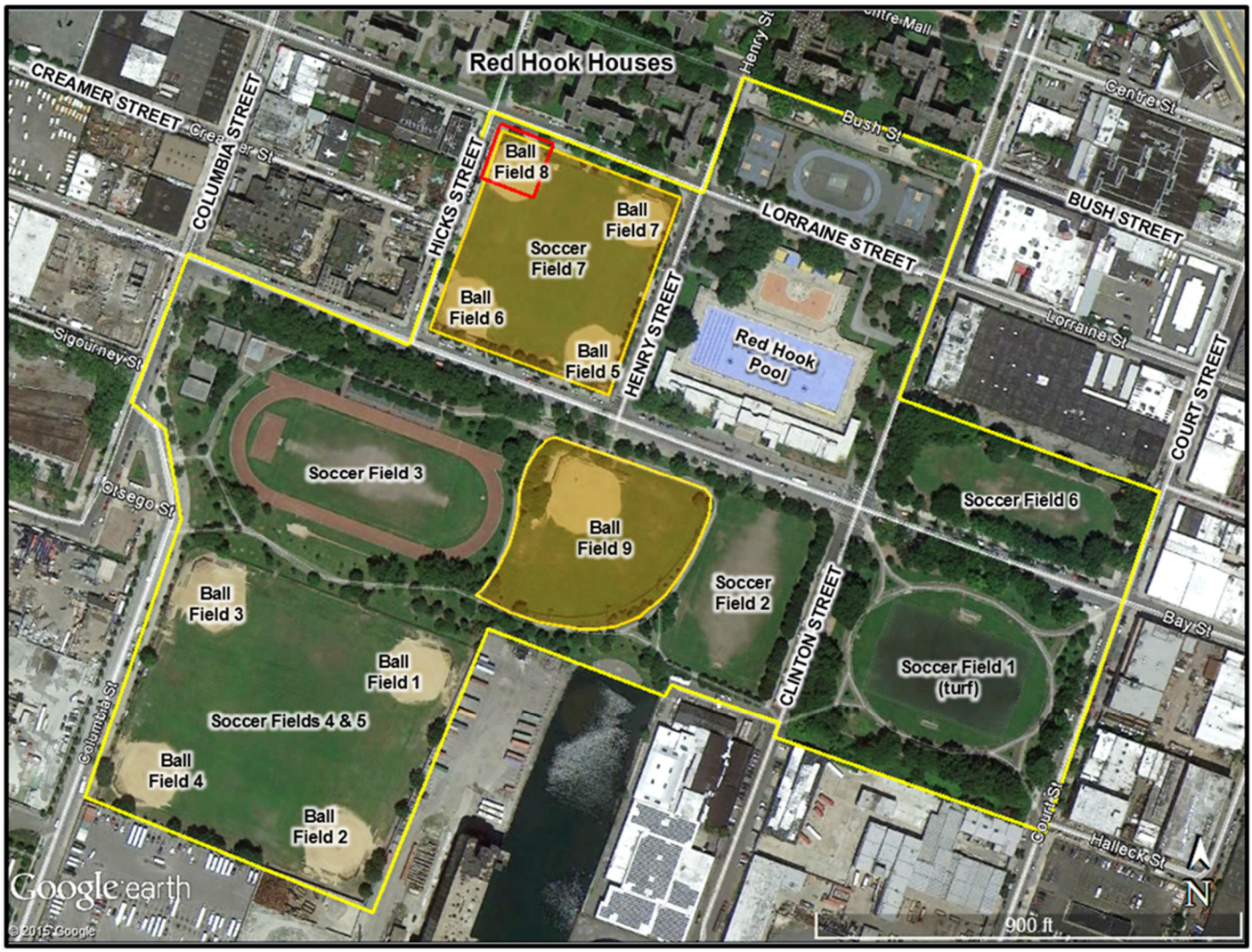
The CIP's purpose is to serve as a guide for EPA in providing opportunities for public information and input regarding cleanup activities involved in the contaminated soil removal project at Red Hook Park in Red Hook Brooklyn, NY. It is also designed to assist the community and other stakeholders in the project area to become meaningfully involved and informed about the project.

This CIP provides a background of the community, presents the EPA's community involvement program and provides a listing of resources available. The EPA drew upon several information sources to develop this plan, including informal community interviews and Site files.

The goals of EPA's Community Involvement Program are to:

1. Provide opportunities for the public to become actively involved;
2. Meet the community's information needs;
3. Incorporate issues and concerns into cleanup decisions, and;
4. Give feedback to the public on how their issues and concerns were incorporated into the cleanup work.

Red Hook Park and Columbia Smelting Site Map



LEGEND
Red Hook Park Border
Approximate Footprint of the Historic Columbia Smelting Facility
Fields Impacted by Columbia Facility Included with EPA Columbia Site Cleanup

2. Site Background

2.1 Site Location/Description

The Columbia Smelting & Refining Works (Columbia) facility, a secondary lead smelter, was historically located at the corner of Hicks and Lorraine Streets in the Red Hook neighborhood of Brooklyn, NY. The smelter's former footprint now sits atop Ball Field 7 within Red Hook Park, which is on the northwest corner of a block with four baseball/softball fields (field numbers 5, 6, 7 and 8) and two soccer fields/cricket courts; see map on the previous page. The areas surrounding Red Hook Park include mixed recreational, residential, commercial and industrial uses.

2.2 Site History

Early Years Pre-1900's

Historic maps of the Gowanus Canal area from the late 1700s through the early 1900s show that most of Red Hook was originally composed of low-lying wetlands, marshes and swamp areas, and that the original shoreline of the Gowanus Bay ran somewhere along the area just north of what is now Red Hook Park. Throughout the 1800s, as industry expanded, the area was filled in. The soil in the area of Red Hook where Red Hook Park is now located is partially, if not entirely, composed of fill material rather than original native soil.

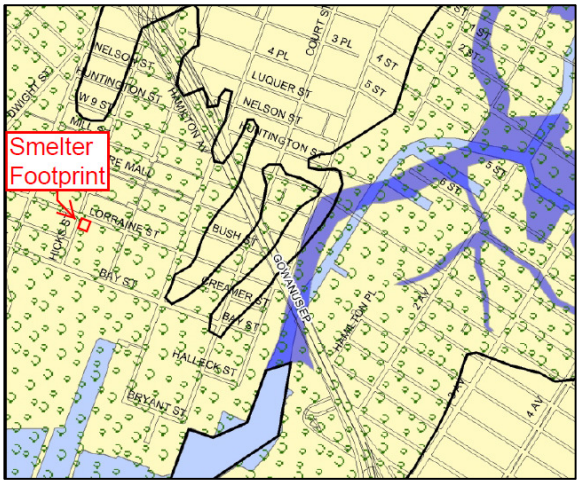


Figure 1: Map showing pre-1900 shoreline and marshy areas

Smelter Years: 1920s-1930s

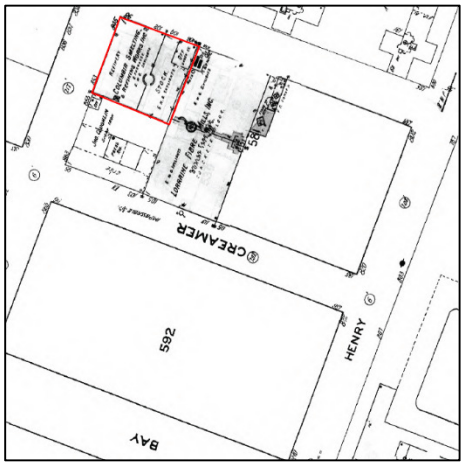
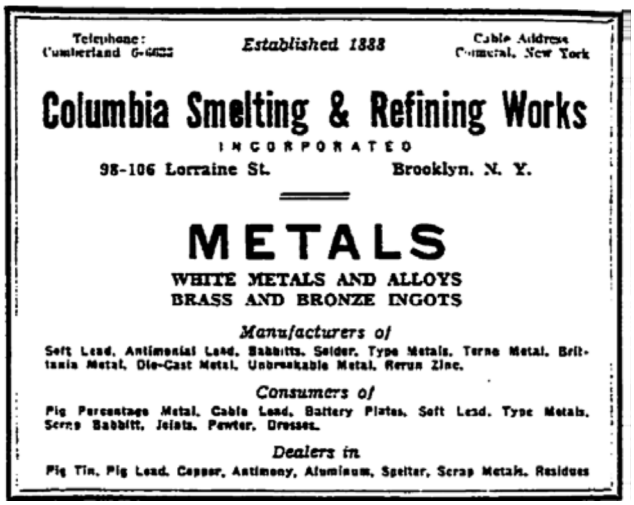


Figure 2: 1938 map showing Columbia facility

Prior to the mid-1920s, the Site property was undeveloped. In the late 1920s, Columbia began operating on the corner of Lorraine and Hicks Streets. From at least 1931 through the late 1930s, Columbia operated as a secondary lead smelter.

Secondary lead smelting plants, like Columbia, refine scrap or used lead materials into metallic lead of a higher purity as well as specialized combinations of metals, called alloys. Some of the



Telephone: Cumberland 6-6622

Established 1888

Cable Address Cometal, New York

Columbia Smelting & Refining Works

INCORPORATED

98-106 Lorraine St. Brooklyn, N. Y.

METALS

WHITE METALS AND ALLOYS
BRASS AND BRONZE INGOTS

Manufacturers of

Soft Lead, Antimonial Lead, Babbitts, Solder, Type Metals, Terne Metal, Britannia Metal, Die-Cast Metal, Unbreakable Metal, Rerun Zinc.

Consumers of

Pig Percentage Metal, Cable Lead, Battery Plates, Soft Lead, Type Metals, Scrap Babbitt, Joints, Pewter, Dresses.

Dealers in

Pig Tin, Pig Lead, Copper, Antimony, Aluminum, Spelter, Scrap Metals, Residues

Figure 3: 1931 newspaper advertisement for Columbia Smelting

materials that Columbia used in the smelting process included cable lead, lead plates from batteries, soft lead, type metal, pewter and other metals.

Secondary smelting can be responsible for releasing lead into the surrounding environment through lead fume emissions. Lead dust and smoke can be released through vents or roof stacks during the smelting process, and slag contaminated with lead may be left over after the smelting process. Lead and other contaminants from the smelter get carried by the wind and settle on the ground. Once lead is in soil, it does not break down, move or leach out of the soil easily; it tends to stay in place.

In the 1930s, while the smelting facility was operating, the Site vicinity (from Columbia to Court Streets and Mill to Halleck Streets) was occupied as a Great Depression-era shanty town known as a Hooverville or Hoover City. Historic photos show numerous shacks and piles of debris in the areas which are now part of Red Hook Park. In 1939 or 1940, the historic smelter building and adjoining facilities were demolished.

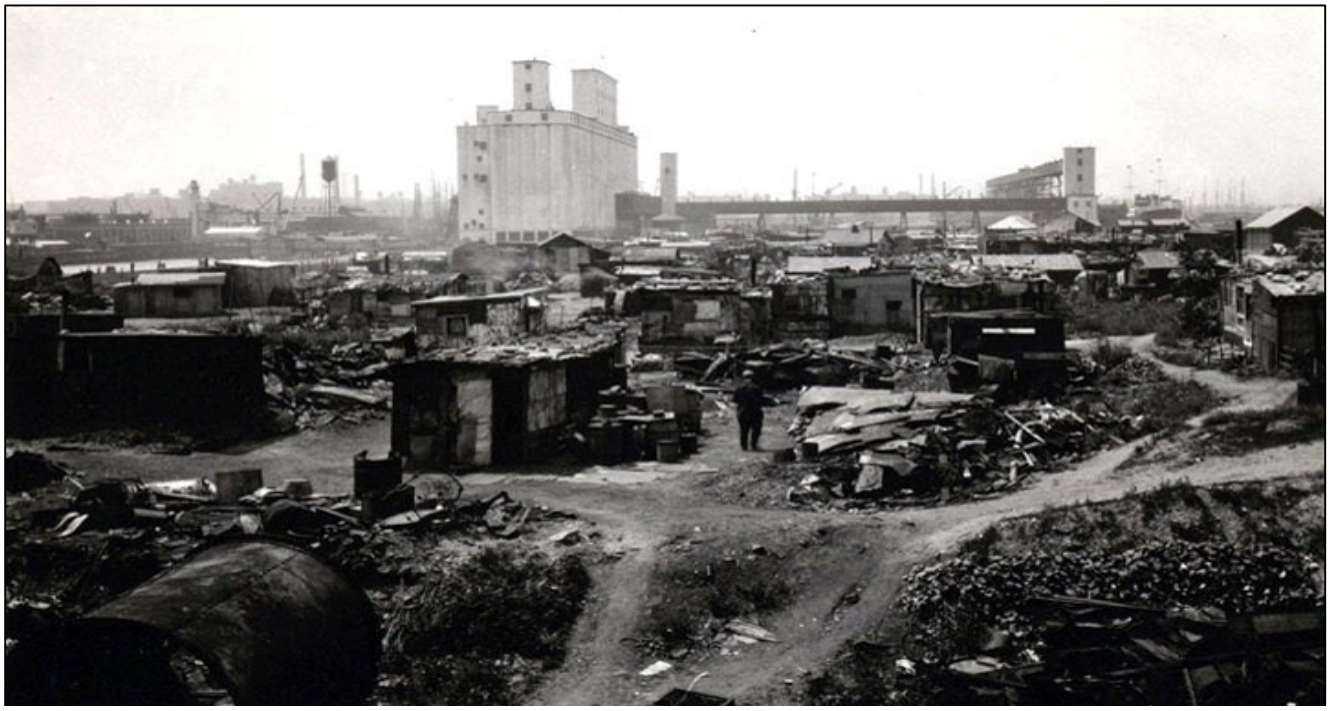


Figure 4: Red Hook's Hooverville circa 1931; this view shows the area along what is now Bay Street, south of the historic smelter. The large grain terminal building on the horizon still stands today.

Site History: 1940s to Present

By 1940, the smelter was demolished and the block where it was located became the four baseball fields that are now part of the 58-acre Red Hook Park. In 1938, the Red Hook Houses (east and west clusters) were completed as a Federal Works Project. Red Hook East Houses, which is located just north of the Site, is the largest portion of the largest public housing development in Brooklyn. It has 27 buildings, two and six stories high with 2,528 apartments housing some 5,654 residents. To the west of the former facility, across Hicks Street, are a series of low-rise multi-family housing units. South and east of the former Columbia facility is Red Hook Park. This includes Red Hook Pool to the east and several other athletic fields.

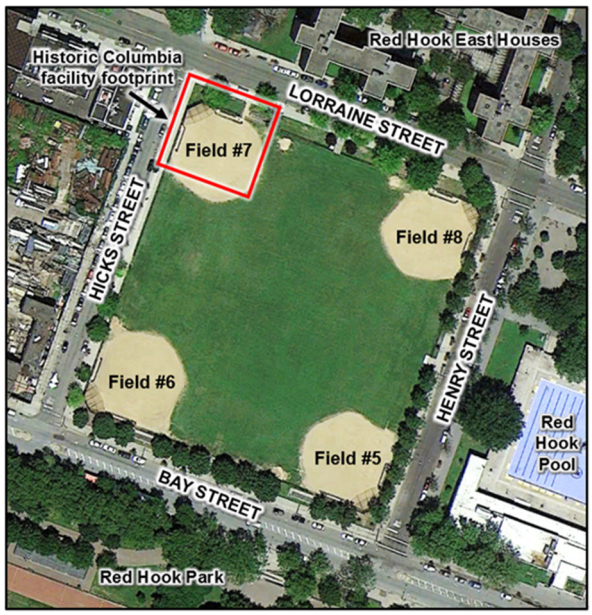


Figure 5: Map overlay of original location of Columbia Smelting

LEGEND

Approximate Footprint of the Former Smelter Facility

Red Hook Park Border

Figure 6: Red Hook Park, showing original location of Columbia Smelting

Why is lead a problem?
Lead is a toxic metal that was used for many years in paint and leaded gasoline. Lead poisoning can cause a number of harmful health effects, particularly in children under the age of six. Exposure to lead in soil can occur when children play in the dirt and put their hands or dusty toys in their mouths. Lead can also get into the body by breathing or swallowing lead dust, or by eating soil containing lead.

Discovery of the Smelter

The historic smelter was first identified in a doctoral dissertation which published a national list of previously unrecognized lead smelting sites that may have operated between 1931 and 1964. In early 2012, NYC Parks first learned of the historic smelter. In consultation with the New York City Department of Health and Mental Hygiene, NYC Parks collected soil samples from the ball fields on and surrounding the former smelter footprint. Results showed that lead the levels in the soil samples were above the EPA and New York State health-based screening level of 400 parts per million (ppm). Because of the elevated lead levels, NYC Parks temporarily closed the fields and conducted maintenance to increase the grass cover. NYC Parks also excavated and paved over the Henry Street entrance to the park, added more clay to the infields and added wood chips where bare soil was present. These measures helped to reduce exposure to lead in the soil.

Also in 2012, the New York State Department of Environmental Conservation (NYSDEC) was independently reviewing all of the previously unrecognized lead smelting sites in New York State. In 2014, the NYSDEC referred the Columbia Site, along with about 40 other sites, to EPA for further assessment. From winter through summer 2014, EPA reviewed the site histories, background information and previous sampling results from the sites. As a result of this initial investigation, EPA decided to sample areas at the Columbia Site that were not previously sampled by NYC Parks.

2.3 EPA Investigation

EPA's investigation consisted of three soil sampling events in October 2014, March 2015 and April 2015. A total of 88 sampling locations were selected. At each location, soil was sampled in five different depth intervals: 0–1"; 1–6"; 6–12"; 12–18" and 18-24".

Sampling locations were chosen using a chart called a wind rose which shows that winds in the area mostly come from a northwestern direction. This meant that at the time Columbia was in operation, emissions from the facility would have been carried by the

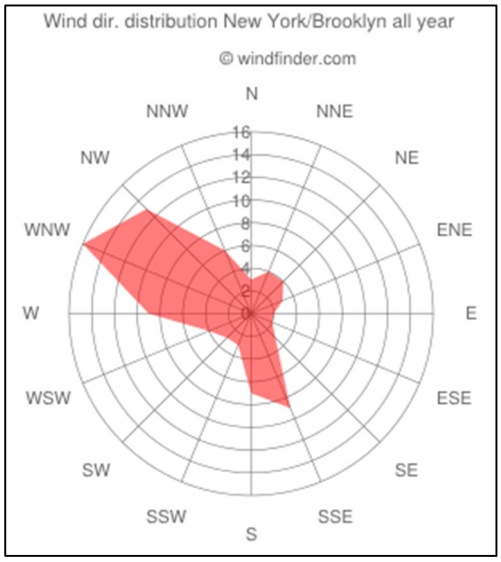


Figure 7: Local wind rose chart for Red Hook

wind in a southeastern direction. The areas most likely to be impacted by the historic smelter would be located southeast of Columbia's original location. Therefore, EPA sampled areas downwind (southeast) of the smelter, as well as areas upwind (northwest) of the smelter footprint, to represent the typical soil conditions in the area for comparison.

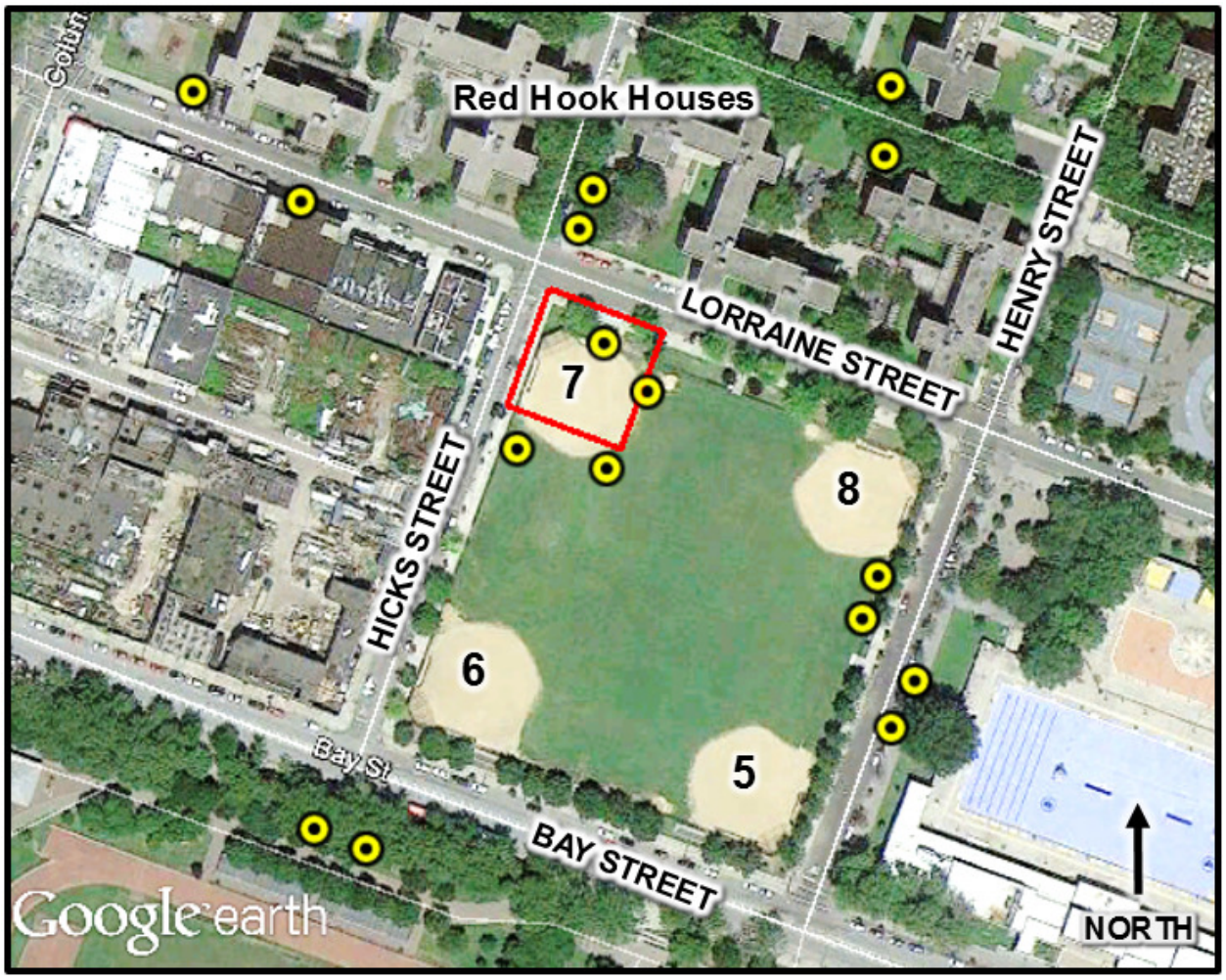


Figure 8: EPA's October 2014 soil sampling locations

October 2014 Sampling Event

In October 2014, the EPA sampled soil on the Red Hook Park ball fields bordered by Lorraine, Hicks, Henry and Bay Streets and several surrounding areas, including the Red Hook Houses (Figure 8). At each sampling location EPA took five samples at different depths: 0-1 inch; 1-6 inches; 6-12 inches; 12-18 inches; and 18-24 inches. Samples were analyzed for several metals including lead. The results of the sampling showed that lead levels in the soil samples were elevated

above health-based values in many locations at different depths throughout the areas that were sampled. The highest lead levels were detected more than an inch below the ground surface.

Further analysis of the soil samples collected from Ball Fields 5-8, near the footprint of the Columbia facility, showed the presence of certain metals (antimony, tin, zinc, iron, and copper) at particular levels that are characteristic of smelter emissions. This "fingerprint" was a clear indication that the lead in these soils most likely came from the former Columbia smelter.

Analysis of the soil samples taken from grassy fenced areas within the Red Hook East Houses, which are not play areas, indicated that the lead could not be linked to the historic Columbia facility. Other sources of lead such as lead-based paint, automobile emissions from leaded gasoline and fill material that may have been used during construction may be the source of lead in these samples.

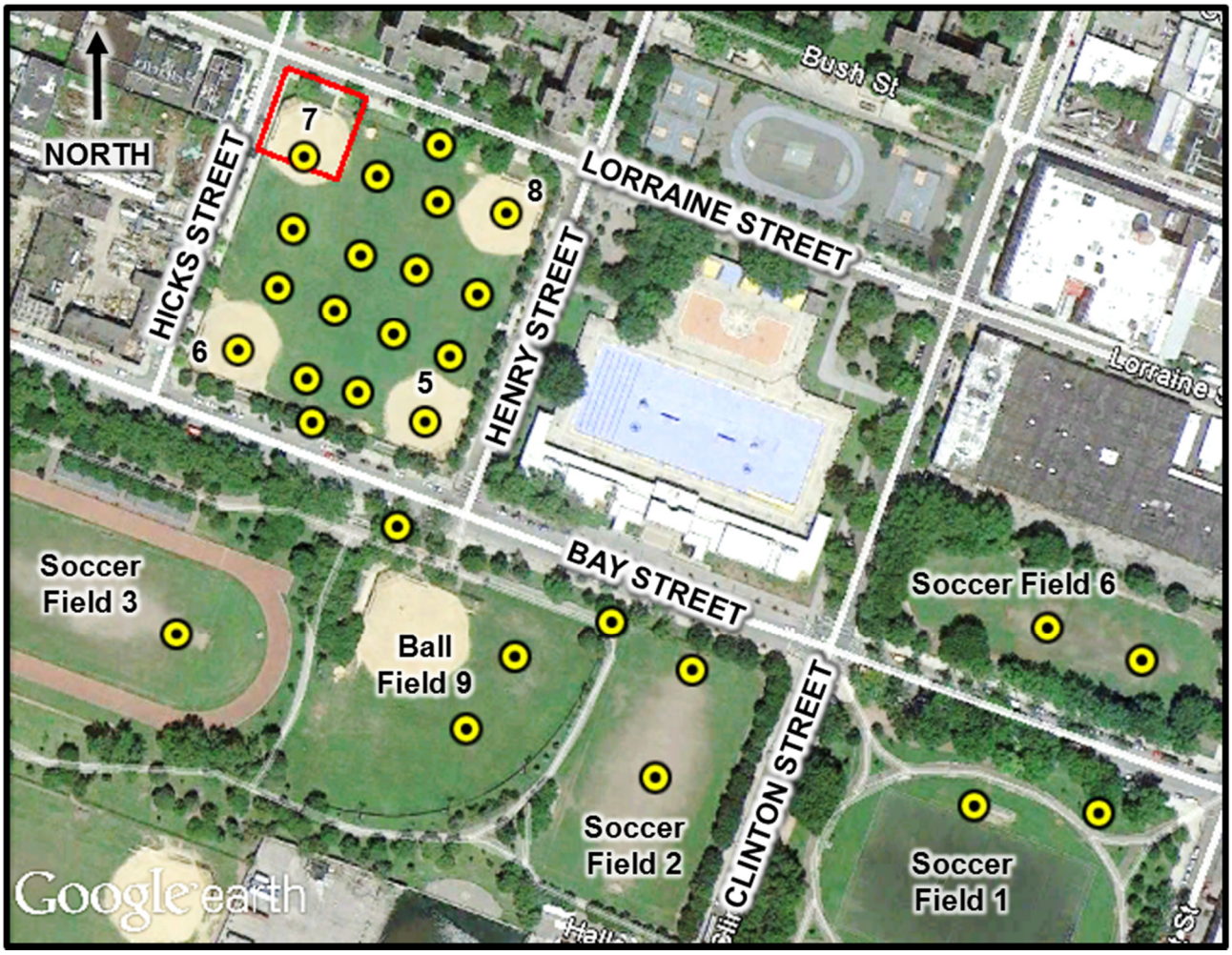


Figure 9: EPA's March 2015 soil sampling locations

March 2015 Sampling Event

In order to identify the extent of contamination that might be present in Ball Fields 5-8, EPA did another round of sampling in March 2015. Soil samples were also collected from several other athletic fields and other areas of Red Hook Park (Figure 9). As in the October 2014 sampling event, EPA took samples at five different depths at each sampling location. The results of this round of sampling showed elevated lead levels in surface soils throughout Ball Fields 5, 6, 7 and 8. Lead levels throughout the block were higher than expected, based on previous sampling results. As a result, the fields, which were closed for grass maintenance, remained closed throughout the 2015 season, and will stay closed until a cleanup can be completed.

Sampling results for the other athletic fields and other areas throughout Red Hook Park beyond Henry and Bay Streets did not show similarly elevated levels of lead in surface soils. Therefore, these areas remained open for public use.

April 2015 sampling event

In April 2015, as a precaution, EPA collected more samples from the following four fields (Figure 11): the single ball field on Bay Street (#9), the two soccer/football fields at the intersection of Bay and Clinton Streets (#2 and #6), and the picnic areas surrounding the turf field (#1) along Bay Street between Clinton and Court Streets.

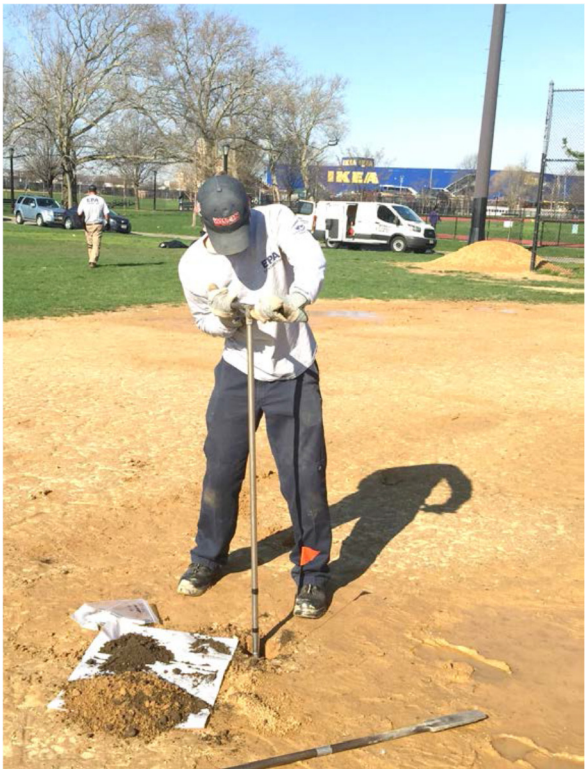


Figure 10: Field personnel taking soil samples

The results of the soil sampling showed that lead levels at these four fields are much lower than those at Ball Fields 5, 6, 7 and 8. Because of this, soil at Ball Field 9 and Soccer Fields 1, 2 and 6 was not an immediate health concern and closure of those fields was not required at this time. However, as a precaution, the New York City Department of Parks and Recreation (NYC Parks) restricted some areas surrounding Soccer Field 1 (the turf field).

Because some of the lead levels several inches below the surface of these four fields are above health-based standards, a cleanup is necessary in the long term. Based on these results, NYC Parks and the

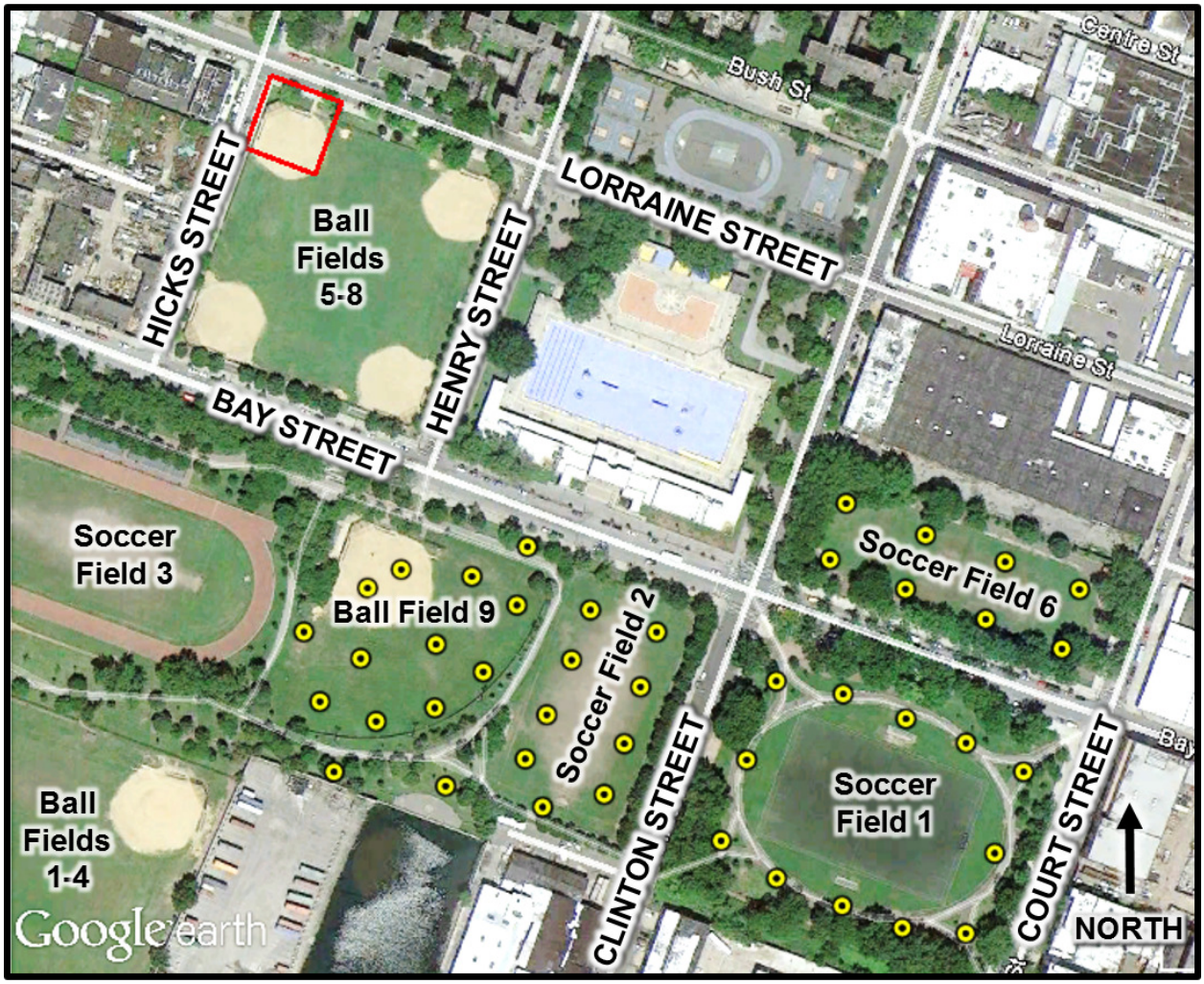


Figure 11: EPA's April 2015 soil sampling locations

NYC Department of Health and Mental Hygiene sampled soil in the remaining areas of Red Hook Park (Soccer Fields 3, 4 and 5, and Ball Fields 1, 2, 3 and 4 and the surrounding areas) between December 2015 and March 2016. This sampling was done independently of EPA's investigation, and included three depth intervals in the upper two feet of soil: 0-3 inches, 3-12 inches and 12-24 inches. Samples were analyzed for lead and other metals as well as a class of common contaminants known as polycyclic aromatic hydrocarbons, or PAHs.

Results of the sampling showed some elevated levels of lead and PAHs unrelated to the former Columbia facility on Soccer Fields 2 and 3 and Ball Fields 1-4. While the metal levels are not nearly as high as those found by EPA on Ball Fields 5-8, as a precaution, NYC Parks has closed Soccer Field 3 within the track, Ball Fields 1-4, which include Soccer Fields 4 and 5, and Soccer Field 2. These fields are also slated for long-term cleanup, although it is unrelated to the Columbia Site, and NYC Parks will be providing updates to park users regarding these fields.

Cleanup

Under EPA oversight, NYC Parks will be remediating Ball Fields 5, 6, 7, 8 and 9, where the lead is from the Columbia facility. The project is referred to as an EPA removal action. Because this is a large construction project, planning for and engineering the cleanup will take more than a year. To reduce disturbing athletic schedules, Ball Fields 5 through 8 will be remediated first, and once they are open again, Ball Field 9 will be cleaned up. The entire project will take several years to complete. EPA will be providing updates as progress is made on planning and completing the removal action.

NYC Parks will also be independently remediating the areas surrounding Soccer Field 1, Soccer Fields 2 through 6 and Ball Fields 1 through 4 over the next several years, where lead contamination is believed to be from historic fill material, not from the historic Columbia facility.

3. Community Background

3.1 Community Profile

Red Hook is a mixed neighborhood, combining residential areas of both low and high density with light to heavy areas of industry and manufacturing zones. The community is a peninsula that is surrounded by the Gowanus Bay, Erie Basin, and Buttermilk Channel. Red Hook is traditionally known as a waterfront community and still retains much of its working class characteristics. A majority of the population lives in the Red Hook Houses (east and west clusters) that were completed in 1938 as a Federal Works Project. (*Source: Community Board 6 - City of New York*)

3.2 Environmental Justice

EPA defines environmental justice (EJ) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

- Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.
- Meaningful involvement means that:
    - people have an opportunity to participate in decisions about activities that may affect their environment and/or health;
    - the public's contribution can influence the regulatory agency's decision;
    - their concerns will be considered in the decision making process; and
    - the decision makers seek out and facilitate the involvement of those potentially affected

By using readily available environmental and demographic information EPA conducts EJ screening to highlight areas within a community where disproportionate environmental and health impacts may fall on a low-income and/or racial minority group. EPA's tool for conducting this initial community characterization is called EJSCREEN.

In the case of the Columbia Site, EPA Region 2 examined the environmental character of the communities near the Site. EPA looked at the environmental impacts currently faced by communities with EJ concerns within the study area. Several environmental indicators were assessed including exposure to air pollutants, lead paint, and proximity to a Superfund Site.

Red Hook residents who use the impacted ball fields have a greater risk of exposure to lead-contaminated soil. The exposure to lead-contaminated soils for the Columbia Site does add an additional environmental burden to communities with EJ concerns. Cleaning up the Red Hook ball fields will reduce the environmental burden on this EJ community.

3.2 Key Community Concerns

Residents in the Red Hook community have a wide range of concerns about issues pertaining to the contamination and cleanup of the Columbia Site. The following issues were raised by community members in several different forums including public information meetings, individual conversations with residents, and consultations with involved stakeholders including local community organizations.

- How widespread is the lead contamination from the Columbia Site?
- What kind of impacts does the contamination have on children and pets?
- Have children playing on the fields been exposed to lead?
- How long will the ball fields remain closed?
- What kind of restoration can the community expect once the ball fields are cleaned up?
- How long will it take to clean up the fields?
- Will there be job opportunities for local workers during the cleanup?
- EPA needs to educate the community about the Site and the contamination.
- Signage should be clearly visible at the closed ball fields.
- Easy-to-understand Site-related materials should be made available to the community.
- Technical support should be provided to the community.
- Where should community members go if they have concerns about the health impacts of the Site?
- What are the risks and protections for the community during the cleanup process?
- Are there airborne risks associated with the removal of the lead-contaminated soils? Particular concerns are asthma and respiratory related health issues.

4. Communication Goals

The EPA is committed to involving the public throughout the lead-contaminated soil removal project. We will endeavor to use the most appropriate communication methods and tools available. We will attempt to use clear, consistent language when communicating with the public and when possible and deemed necessary, documents will be translated into Spanish. Technical aspects and decision-making processes will be explained using everyday language. We will make every effort to respond to community questions and concerns throughout the community involvement and outreach process. We will endeavor to provide the public with accurate information in a timely fashion.

5. Community Involvement Tools and Outreach Activities

Outreach efforts will place a strong emphasis on collaborating with park users, residents of Red Hook Houses, local community organizations, NYC Parks as well as local government and the New York City Department of Mental Health and Hygiene.

5.1 Involvement and Input

Public Input

Description: Written communications and informal discussions with agency staff are just some ways the public and the partner agencies can communicate about and provide input on the project.

Goal: The EPA will strive to maximize the information available to the public. The EPA's goal will be to continuously seek and consider public input on the various aspects of the cleanup project through use of a variety of tools in this CIP.

Method: Informal comments can be offered at any time, such as during public meetings, community visits, and via stakeholders. See Appendix 1 for Contacts and Interested Parties for the project. Written comments may be submitted via mail or email.

Toll-free Hotline: 1-877-251-4575

Description: The EPA has established a toll-free hotline available to the public.

Goal: To provide the public with a free, direct method of communication between the community and EPA, particularly for those who do not use the Internet or have access to it.

Method: The public can phone the toll-free number (which will be included in all outreach publications, signs, posters, etc.) to find out about upcoming meetings, where to get information about the project, and to speak with someone from the EPA or leave a voicemail message.

5.2 Outreach

Fact Sheets and Flyers

Description: Fact sheets and flyers help the public understand highly technical reports, concepts, and information in a format that informed laypeople can process and understand.

Goal: Provide information about the lead-contaminated soil removal project in an easy-to-understand format. Fact sheets will be used periodically to update the community on progress being made, who to contact with questions or input, and what to expect in the near future.

Method: Fact sheets will be produced throughout the life of the project to keep the public informed and educated on the cleanup activities. Fact sheets are provided to the public through the management office at the Red Hook East Houses and at the Miccio Center, posted at various locations throughout the apartment buildings, on the website, at public forums, and provided to stakeholder organizations for dissemination to their constituents as appropriate. As needed and as resources allow, fact sheets and project updates will be translated into Spanish.

Field Notifications

Description: This type of information consists of advisories, restrictions, and explanatory signs posted to clearly mark for the public any project work areas and access or parking restrictions.

Goal: These notifications are intended to keep the public informed of project field activities and maintain public safety.

Method: All advisories, signs, and restrictions to access or project work areas will be clearly posted, and may be translated into languages other than English, should that need arise. Health and Safety Plans will also be used to inform and maintain a safe environment for both the public and project workers.

Maps and Visual Aids

Description: Maps and visual aids help people understand the geography of the Site and locations of activities and resources, especially in relation to where they live, work, and attend school.

Goal: To communicate complex issues simply and effectively. The EPA will use maps and visual aids at public meetings to assist in communicating information regarding project work areas, processes, technologies related to the removal of contaminated soil.

Method: Inclusion of maps, photographs, and other visual aids in documents and fact sheets, at public sessions, and on the EPA website.

Public Notices

Description: Widely distributed announcements of public meetings and major project milestones.

Goal: Communicate an important announcement to as many people as possible.

Method: Public notices will be used to announce public meetings using a wide variety of places and methods. The EPA will also reach out to local community groups and key stakeholder organizations to request their assistance in getting out the word.

Project Website

Description: Internet access to technical reports and updates on the contaminated soil removal project will be available on the EPA's Columbia Smelting and Refining Works website at:

http://www3.epa.gov/region02/superfund/removal/columbia

Goal: The EPA's website provides key resources for accessing both general and specific information about the projects.

Method: EPA will post project updates, fact sheets, notices, and technical documents in as timely a manner as practicable. Notice of all public meetings and forums and announcements related to the project will be posted immediately. The website will be updated regularly.

5.3 Involvement and Input Integrated with Outreach

Coordination with Local Government and Other Agencies

Description: EPA will coordinate with local government and other agencies to keep them informed of project activities and obtain feedback on their concerns. Communication with these representatives will continue through the life of the project.

Goal: To ensure that local government officials and other agencies are kept informed of project activities and issues that may impact their constituencies. Ongoing coordination with local governments and other agencies will address communities' concerns regarding redevelopment issues that may be associated with the project.

Method: EPA will keep an open line of communication with local officials and agency staff via meetings and regular dialogue.

Email

Description: Electronic mail can be used to contact agency representatives for information or to ask questions and receive answers about the projects.

Goal: This provides another method to assist the public in providing input or requesting information.

Method: Email addresses and links are provided on the project website, at public meetings and forums, and on fact sheets.

Environmental Justice Activities

Description: Environmental justice activities encourage participation from communities that may have been disproportionately impacted by polluting facilities.

Goal: To bring populations of varying ethnic, racial, and economic backgrounds into the public process.

Method: The EPA will ascertain ways to reach low-income and minority populations. Examples include printing public notices and fact sheets in languages other than English, working with agencies and community organizations that serve these populations, and enlisting the help of these agencies and organizations at public forums and meetings. EPA will network with other organizations to act as a conduit of information from the project to the populations of concern.

Public Meetings

Description: Public meetings are structured meetings that are open to the general public, featuring a presentation and interaction with the public.

Goal: To provide personal contact with agency representatives, update the community on Site developments and address community concerns, ideas, questions, and comments.

Method: The EPA will schedule, prepare for, and attend all announced meetings. Whenever possible, public notice will be given at least two weeks before scheduled public meetings.

Stakeholder Group Interaction

Description: The EPA will coordinate with and upon request, attend meetings with stakeholder groups.

Goal: This interaction helps ensure that members of these organizations receive the information that they need and that the partner agencies receive their input and understand their concerns. Interaction with stakeholder groups builds bridges of communication across various constituencies and can extend the outreach capabilities of the partner agencies.

Method: EPA will regularly coordinate with and upon request, attend meetings of stakeholder groups, based on agency availability.

6. Summary of the EPA's Community Involvement Program

The EPA is committed to keeping the community informed during the entire cleanup process. To facilitate the community involvement program, the EPA has designated a Community Involvement Coordinator (CIC) to act as a primary liaison between the community and the agency. The CIC will ensure prompt, accurate and consistent responses and information dissemination about the Site; handle Site inquiries; and serve as the point of contact for community members. The CIC assigned to the Columbia Smelting and Refining Works Site is:

Natalie Loney
Community Involvement Coordinator
290 Broadway
New York, NY 10007-1866
(212) 637-3639
loney.natalie@epa.gov

Throughout the cleanup process, the EPA will work to:

- provide adequate and meaningful opportunities for community involvement to update the community on Site developments and address community questions, concerns, ideas and comments.
- hold public meetings to update the community on Site developments and address their questions, concerns, ideas and comments.
- make informal visits to the community to help keep them informed about the Site and Site activities, while providing EPA with feedback activities and the community's concerns, issues and opinions.

Appendix 1
Contacts and Interested Parties

Elected Officials:

Federal

Senator Chuck Schumer
New York City Office
780 Third Avenue
Suite 2301
New York, NY 10017
212-486-4430

Senator Kristen Gillibrand
New York City Office
780 Third Avenue, Suite 2601
New York, New York 10017
212-688-6262

Congresswoman Nydia M. Velazquez
266 Broadway, Suite 201
Brooklyn, NY 11211
718-599-3658

New York State

New York State Senator
Velmanette Montgomery
30 Third Avenue
Brooklyn, NY 11217
United States
718-643-6140

New York State Assemblyman
Felix Ortiz
404 55th Street
Brooklyn, NY 11220
718-492-6334

New York State Assemblywoman
Joan Millman
341 Smith Street
Brooklyn, NY
718-246-4889
millmaj@assembly.state.ny.us

New York City
New York City Mayor
Bill De Blasio
City Hall
New York, NY 10007
311 or 212-NEW-YORK (outside of New York City)

Brooklyn Borough President
Eric Adams
209 Joralemon Street
Brooklyn, New York 11201
718-802-3700

New York City Council Member
Carlos Menchaca
District Office
4417 4th Ave, Ground Floor
Brooklyn, NY 11220
718-439-9012
info38@council.nyc.gov

EPA Regional Contacts

Margaret Gregor
On-Scene Coordinator
2890 Woodbridge Ave.
Edison, NJ 08837
Phone: (732) 321-4424
gregor.margaret@epa.gov

Natalie Loney
Community Involvement Coordinator
290 Broadway, 26th Floor
New York, NY 10007-1866
Phone: (212) 637-3739
loney.natalie@epa.gov

George H. Zachos
EPA Regional Public Liaison
2890 Woodbridge Ave.
Edison, NJ 08837
Toll-free: (888) 283-7626
zachos.george@epa.gov

NYC Parks Contacts:

Kevin Jeffrey
Brooklyn Borough Commissioner
Litchfield Villa, Prospect Park Brooklyn, NY 11215
Phone: (718) 965-8900