

THE SYNOD OF THE NORTHEAST

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John Iannotti
New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
625 Broadway
Albany, NY 12233-7250

Dear Mr. Iannotti:

I am writing in personal support of the position of the Presbytery of Western New York, a regional governing body of the Presbyterian Church (USA) within the Synod of the Northeast, and in opposition to the current New York State DEC toxic waste siting plan, particularly with regards to the Chemical Waste Management facility in the towns of Lewis and Porter, NY.

Today Debbie Aldrich advised, in a helpful way, that the public hearings being conducted by the DEC are related to the comprehensive hazardous waste siting plan for the whole state, and in that context a reference to one particular site may not be welcome. I had intended to come to the hearing in Syracuse, but believe my purpose would be best served with this letter.

Western New York Presbytery has taken formal action that they will communicate to appropriate media, Governor David Paterson, DEC Commissioner Peter Grannis, and to the Western New York delegation of the NYS Legislature, but I want to join them by sharing with you a concern about the facility operated by Chemical Waste Management on the property commonly known as the Lake Ontario Ordinance Work, one of only nineteen such hazardous waste facilities in the United States. The presbytery is opposed to the facility's expansion. While it may be most appropriate to take that concern to the siting board once the plan for the whole state is adopted, since the CWM facility is the only hazardous waste facility of its type within the State of New York, reference to it in particular certainly affects the totality of the New York plan. It makes the entire plan a public health concern, and I believe it could be argued that it makes the *whole plan* a public health risk. It seems to me that a more orderly process would be to consider each of the sites, and then consider the total plan, rather than taking them together and then hearing comments regarding the specific sites.

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The primary concerns, according to my understanding, are that:

- The CMW site is near Lake Ontario, and on top of unexamined nuclear wastes from the Manhattan project.
- Trucks carrying the materials pass by schools; any leakage creates a public health risk to children.
- Significant PCBs are buried at CWM, and are apparently discharged into Four Mile Creek and Twelve Mile Creek; effluent will continue to contaminate Lake Ontario, prolonging a significant health risk.
- While the U.S. Army Corps of Engineers, rather than the DEC, may have responsibility for cleaning up and controlling chemical and radioactive contamination incurred by the federal government, including 2,000 curies of Radium 226 stored on federal property adjacent to CWM, the proximity of radioactive material and potential problems that may occur due to earth disturbance would seem to be an issue for the DEC's consideration in approving a state-wide hazardous waste siting plan, and particularly the Chemical Waste Management site in Western New York.

Finally, let me say that I am a twenty-nine year resident of New York State. I well remember the devastation of Love Canal in Western New York. It appeared to me that the scandalous toxicity was born of poor decision-making compounded by denial that resulted in the ruin of the health and lives of many individuals and families. In the case of toxic waste, the DEC is the steward of community health, and we count on you to have the public interest at heart.

Sincerely,

Clinton A. McCoy, Jr.
Executive for Partnerships
Synod of the Northeast, Presbyterian Church (USA)

cc: Rev. Rex Stewart, Presbytery of Western New York
Rev. Bronwen Boswell, Stated Clerk, Presbytery of Western New York
Rev. Lance Brown, Council Moderator, Presbytery of Western New York
Rev. Janet Adair Hansen, Synod of the Northeast Public Policy Advocacy Network
Mary Lynne Flowers, Synod of the Northeast Executive for Administration/Stated Clerk
Mary Lu Bowen, Executive Director, New York State Council of Churches

Encl. Resolution of Western New York