



GOWANUS CANAL COMMUNITY ADVISORY GROUP (CAG)

your local voice for Superfund

For more information: www.GowanusCAG.org

The following CAG resolution requests formal consideration by the indicated parties to conduct activities related to the Gowanus Canal with regard to the concerns and interests of the Gowanus community.

Title: Former Citizens MGP Works Site

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To: Lisa Garcia – USEPA Region 2 Regional Administrator
Alyssa Arcaya – USEPA Region 2 Deputy Regional Administrator
Ariel Iglesias – USEPA Region 2 Director, Land, Chemicals & Redevelopment Division
Pat Evangelista – USEPA Region 2 Director, Superfund & Emergency Mgmt. Division
John Prince – USEPA Region 2 Deputy Director, Superfund & Emergency Management Division
Dore LaPosta – USEPA Region 2 Enforcement and Compliance Assurance Division

Date: October 24, 2023

Background:

It has come to the Gowanus Canal Community Advisory Group's (CAG) attention that National Grid and NYSDEC (DEC) have not been able to gain access to Parcel 4 (Bklyn Block 468, Lot 25) of the former Citizens MGP Works site for several years because the property owner refuses to allow access to the property. This prevents National Grid and DEC from performing sampling of the existing monitoring wells and implementing DEC's approved Supplemental Soil Investigation Work Plan as part of NYSDEC's Superfund Program. The CAG understands that Parcel 4 remains heavily polluted with cancer-causing substances harmful to the community.

It is thus resolved that:

- due to DEC and National Grid's inability to gain access to Parcel 4 to perform crucial environmental work on the site, and;
- given the fact that the site remains polluted and that Parcels 1, 2 and 3 have not been remediated to "pre-disposal" conditions according to New York State Law and;
- according to a [2005 report on Public Place by GEI](#) that documents that coal tar and other toxins have already moved off Parcel 4 and have been detected along 4th Street, on Hoyt Street and are flowing towards the Gowanus Canal and;
- due to the four sites' extremely high ground water levels, recent flooding in the area and subsurface intrusion that may have occurred in neighboring buildings where volatile organic compounds (VOCs) may have entered as vapors or as groundwater and may be volatilizing in the buildings,

CAG thus points out not only the real risk of recontamination between Parcel 4 and the other three former Citizens MGP Works site parcels, but more importantly, the likelihood of recontamination of the EPA's Gowanus Canal Superfund site.



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As the 2013 Gowanus Canal Record of Decision (ROD) clearly states:

In the unlikely event that timely and effective state-selected remedial actions are not implemented at a given former MGP facility, the EPA may implement actions pursuant to CERCLA to ensure the protectiveness of the selected remedy. (pages 3 of [Gowanus ROD](#))

The Gowanus CAG therefore reminds EPA of our previous [CAG Resolution dated September 14, 2021](#) and again prevails upon our Federal Government to take over all 4 parcels of the former Citizens MGP Works site as part of its Federal Gowanus Superfund work.

Our community's health is in your hands.

CC:

Hon. Charles Schumer, US Senator

Hon. Dan Goldman, US Congressperson

Kristen Rouse, Deputy Dist. Dir for Congressman Daniel Goldman

Hon. Andrew Gounardes, NYS Senator

Hon. Jo Ann Simon, NYS Assembly Member

Susannah Pasquantonio, Chief of Staff for Assembly Member Simon

Antonio Reynoso, Brooklyn Borough President

Shahana Hanif, Councilmember, District 39

Alexa Aviles, Councilmember, District 38

Lincoln Restler, Councilmember, District 33

Brooklyn Community Board 6

Brooklyn Community Board 2

Michael Regan, USEPA Administrator

Natalie Loney, USEPA Community Involvement Coordinator, Region 2

Brian Carr, Esq., USEPA Regional Counsel, Region 2

Please direct all responses to doug@forumfg.com