



# GOWANUS CANAL COMMUNITY ADVISORY GROUP (CAG)

*your local voice for Superfund*

For more information: [www.GowanusCAG.org](http://www.GowanusCAG.org)

The following CAG resolution requests formal consideration by the indicated parties that conduct activities related to the Gowanus Canal and its upland sites regarding the concerns and interests of the Gowanus community.

The Gowanus Canal CAG formally requests the Environmental Protection Agency (EPA) and the New York City Department of Environmental Protection (DEP) to take the following actions regarding the construction of the Owls Head CSO Tank.

**Proactive tenting:** Install a tent or equivalent enclosed containment structure with an active ventilation and odor treatment system over the entire excavation area before soil excavation begins. The contamination at this site is severe, documented, and located directly within the excavation path. Given the Investigation Report findings and the Nevins Street communities experience with the Red Hook CSO Tank construction, the community should not have to prove harm before this protection is in place.

**If the EPA & DEP decline to proactively tent:** 1) Provide a written explanation to the community, before excavation begins, why pro-active tenting is not justified; 2) Commit in writing, before excavation begins, to the specific monitoring readings and/or community complaint criteria that will automatically trigger a work stoppage and site tent installation. This threshold must be published publicly so that community members can hold both agencies to an objective standard.

**Neighborhood-wide air monitoring, including across the Canal:** Deploy air monitoring stations not only at the construction site perimeter, but also on the residential blocks surrounding the site and on the west side of the canal, which is more densely residential. In the blocks surrounding the site on both sides of the Canal are several schools and preschools.

**Real-time public data and notification:**

Make all monitoring data including readings from the neighborhood-wide network publicly available in near-real-time on an accessible website and notify community members within 24 hours any time a reading exceeds an established threshold.

**Public notice:**

Circulate public notices in advance about the excavation and expected duration to neighborhood residents, businesses, schools, pre-schools and places of worship, with a centralized contact for inquiries and complaints.

**Background**

The City is about to begin excavating the Owls Head CSO tank site on 2nd Avenue at the bend of the canal, and it will be digging directly through some of the most contaminated ground anywhere along the Gowanus Canal. A February 2025 investigation report (link below) commissioned by NYSDEC and prepared by Ecology and Environment Engineering, documents in precise detail what lies beneath the site: pools of free-phase coal tar over a foot thick in up to 7 of 12 intermediate monitoring wells, and chemical concentrations including the same naphthalene that fouled Nevins Street that are in the orders of magnitude above regulatory limits.

[Citizens Off-Site Investigation of Owls Head Site](#)

Excavation is planned through the spring and summer of 2026, when residents have their windows open, children are outdoors, and residents are using the park, stoops, and the waterfront. We saw what this looks like at the Red Hook CSO Tank site at Nevins Street: months of noxious odors, residents unable to open their windows, reports of headaches and migraines and a partial tent over equipment that came only after prolonged community harm and complaints.

This Resolution calls for a different approach at Owls Head: protect the community before excavation starts, not after complaints pile up.

**WHY WE ARE CONCERNED**

**The Investigation Report confirms severe contamination — directly in the path of excavation**

The February 2025 Investigation Report documents the following conditions beneath the Owls Head CSO Tank site:

- The contamination is concentrated in the intermediate aquifer, which runs from approximately 30 to 51 feet below ground surface. The planned excavation will go approximately 60 feet. The most contaminated zone sits squarely within the excavation footprint.
- Highly concentrated coal tar contamination including odor-causing naphthalene is present in intermediate groundwater at up to 20,100 µg/L against a screening level of 10 µg/L — more than 2,000 times the threshold.



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- The contamination is most concentrated along the western third of the site and adjacent to the northern bulkhead, the portions of the site nearest to the Canal and closest to the residential neighborhood. As previously mentioned, several schools and pre-schools are located on both sides of the Canal within several blocks of the site.
- The investigation required its own Community Air Monitoring Plan during drilling because of the contamination risk from ground-intrusive activities. If an investigation involving small-diameter boreholes required community air monitoring, a full-scale excavation through the same zone demands far more robust protection.
- "A small upward groundwater gradient appears to be located on the western portion of the site" (Investigation Report, Section 4.2). This means groundwater and the contaminants dissolved in it are moving upward from the intermediate zone toward the surface, not downward. Excavation into this zone will accelerate and amplify that upward migration. Digging into the intermediate zone will not just expose contamination; it will actively release pressure on a system that is already trying to move volatile chemicals upward.
- A key question raised about the tenting proposal has been whether the smaller Owls Head CSO Tank site excavation is comparable to the work at larger Red Hood CSO Tank site. The answer, based on the Investigation Report, is that size is not the determining factor. What matters most is this the intermediate aquifer where virtually all the NAPL, coal tar, and highest-concentration VOCs and SVOCs are located begins at approximately 30 feet below ground surface and extends to approximately 51 feet. The planned Owls Head CSO Tank excavation will reach approximately 60 feet below ground surface. The excavation will therefore pass entirely through the most contaminated zone, not merely grazing it.
  - Excavation is expected to begin in spring 2026 and continue through summer. This is not a minor detail. Volatile organic compounds off gas more readily in warm temperatures. The same subsurface disturbance that might release moderate vapors in February will release significantly more in July and the community exposure is at its highest precisely in warm weather:
  - Windows are open. Residents of the buildings immediately surrounding the site and across the canal will be breathing outdoor air continuously.
  - Children are outside. Families use community parks, backyards, stoops, and sidewalks near the site throughout the day.
  - Children also attend summer programs at most of the schools and daycare centers in the immediate surrounding area.
  - The Owls Head CSO Tank site is surrounded by the Canal on three sides, meaning wind patterns will regularly carry emissions across the water toward Carroll Gardens.

### **What happened at the Red Hood CSO Tank site and what it means for the Owls Head CSO Tank site**

- Odor complaints at the Red Hook CSO site began in fall 2023 and continued for months despite foam spray, misting systems, and multiple daily odor inspections.
- There was confusion over which agency to contact with complaints, with the community consistently requesting greater clarity and one central number to call.
- Residents reported headaches, migraines, nausea, and being unable to open their windows or use rooftop spaces. Some reported odors entering their homes at night.
- EPA monitoring confirmed naphthalene was present but below the agency's health-based action threshold. That threshold is set for chronic lifetime exposure it does not mean residents weren't being harmed in terms of quality of life, comfort, and daily function.
- A tent was eventually installed over the slurry separation equipment confirming that tenting is feasible at these sites but only after months of documented community harm.
- The city then accelerated its construction schedule, which also reduced odor generation. The lesson: the community bore the cost of the reactive approach. The agencies adapted. The neighbors suffered first.

### **The current plan still puts the burden on the community**

The EPA states that if mitigation proves "ineffective," EPA will direct NYCDEP to halt excavation and install a tent. That is a meaningful commitment, but it is a reactive one. In practice it means:

- Residents must experience enough harmful odors, complaints, and discomfort to demonstrate that standard measures aren't working.
- There is no publicly stated definition of how many complaints, or what concentration levels, automatically trigger that halt. The threshold is discretionary.
- Perimeter air monitoring at the construction site boundary may not capture what residents across the Canal or several blocks away are actually breathing.
- Residents become, in effect, the early warning system for a contamination event that the Investigation Report has already documented in precise detail.