

Via Electronic Transmission and Hand Delivery

April 26, 2013

Mr. Christos Tsiamis
Remedial Project Manager
Central New York Remediation Section
U.S. Environmental Protection Agency
290 Broadway, 20th Floor
New York, New York 10007-1866

Re: Gowanus Canal Superfund Site, Brooklyn, New York (Site)
Comments on Proposed Remedial Action Plan (Proposed Plan)

Dear Mr. Tsiamis:

On behalf of the undersigned entities¹, we are providing the enclosed comments on the Proposed Plan dated December 2012, issued by Region II of the United States Environmental Protection Agency (EPA) for the above-captioned Site.

A number of the comments presented in the enclosure reflect concerns expressed previously by a group of PRPs (by June 19, 2012 letter to the National Remedy Review Board), as well as by others, with respect to the draft Feasibility Study. These comments are repeated here because they were not adequately addressed in the Proposed Plan.

The undersigned PRPs continue to believe that: (a) the conceptual site model remains incomplete; (b) continuing contamination needs to be addressed prior to implementing the Site remedy; (c) alternative remedies (e.g., capping, and monitored natural attenuation) were not evaluated or properly carried through the evaluation process; (d) the proposed remedy has been selected prematurely; and (e) the schedule of remedy implementation is unrealistic.

Our specific comments and concerns are presented in the enclosed document.

Respectfully submitted,

Beam, Inc.²
The Dun and Bradstreet Corporation
ExxonMobil Oil Corporation
Hauck Manufacturing Company
Hess Corporation
Honeywell International Inc.

¹ Each of these entities has been identified by EPA as a Potentially Responsible Party (PRP) at the Site.

² Signatories are listed in alphabetical order.

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MRC Holdings, Inc., for itself and on behalf of Citigroup, Inc.
Patterson Fuel Oil Company, Inc.
Rexam Beverage Can Company
SPX Corporation as successor to O-Z/Gedney Co., Inc.
Union Oil Company of California
Verizon New York Inc.