



**U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Admin.**

National Ocean Service
Office of Response and Restoration
Assessment and Restoration Division
c/o EPA Region 1 (OSRR07-1)
5 Post Office Square – Suite 100
Boston, MA 02109
20 January 2012

Mr. Christos Tsiamis/ Mr. Charles Nace
U.S. Environmental Protection Agency
U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, New York 10007

Dear Christos and Chuck:

Thank you for the Feasibility Study for the Gowanus Canal Superfund site. The thoroughness of the report and the protective suggested alternatives results in very few resulting comments and recommendations. I look forward to meeting with EPA and the other stakeholders.

1. I have no technical objection when selecting between Alternatives 5 and 7 with regard to EPA's engineering solution concerning the possible need for in situ stabilization (ISS). But the cost difference between the two is only 5-10%. Hence, I recommend including ISS (alternative #7) as that should result in a more protective remedy given the 2- to 4 thousand mg/kg average concentrations under Alternative 5 that will sit below the cap in the native sediment. Of course EPA must examine if they can implement Alternative 7.
2. Concerning the seven treatment and disposal options, NOAA does not object to any except for Options F or G currently under consideration only for Remediation Target Area (RTA) 1. And that because some of the aqueous habitat is permanently removed with a CDF. Hence, mitigation for the lost acreage will need to follow and I cannot envision such a project at, or nearby, the Gowanus Canal. But probably more important are my experiences with planned CDFs at other CERCLA sites not getting accepted by the local public that lives nearby.
3. The sediment PRG of 7.8 mg/kg for total PAH is very protective. In fact, it may result in some serious protest from the PRP group. That given because the endpoint supporting this remedial goal is the amphipod growth and reproduction NOEC (No Observed Effect Concentration) not the survival NOEC or LOEC (Lowest Observed Effect Concentration). NOAA will help you support this value but it is a conservative concentration that could possibly delay a remedial action funded by the PRPs. It might provide worthwhile to calculate the LOEC for growth and reproduction – I estimate at about twice the current PRG – so that a range of potential PRGs is available during future meeting with the PRPs.

4. Given the two alternatives suggested in the FS, my BERA comments from 25 January 2011 numbered 5, 11, 13, 14, 15, and 17 are mostly now moot
5. The projected removal of approximately 588,000 cubic yards is certainly impressive however the cost of around 200 million dollars likely will result in much debate between all of the regulators and stakeholders. And the additional cost to NYC for upgrading the CSO problem remains to be decided upon. However, these issues are obvious to even the most disinterested observer.

Please let me know if you have any questions.

Sincerely,

Kenneth Finkelstein, Ph.D