TO:
XX, EPA
XX, DEC
Lisa Garcia, DEP

CC:
DEP
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Alicia West, Senior Advisor for Planning & Strategy
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Patrick Foster – Deputy Commissioner for Environmental Remediation and Materials Management
Scott Deyette – NYSDEC Region 2 Bureau Director
Lisa orton – NYSDEC Region 2 Section Chief Division of Environmental Remediation
Heide-Marie Dudek, P.E. Chief, NYSDEC Division of Environmental Remediation

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Michael Sivak, EPA Region 2 Chief
Tom Mongelli, EPA Region 2 Remedial Project Manager
Victoria Sacks, EPA Region 2 Remedial Project Manager
Mark Granger, EPA Region 2 Remedial Project Manager
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Elected Officials
Honorable Dan Goldman – U.S. Congressperson
John Blasco – Deputy Chief of Staff for Congressman Daniel Goldman
Carlos Rondon – Director of Community and External Affairs for Congressman Daniel Goldman
Kasmir Flood – Field Representative for Congressman Daniel Goldman

Honorable Jo Anne Simon, Assembly Member, NY Assembly District 52
Susannah Pasquantonio – Chief of Staff for Assembly Member Simon

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The Gowanus Protection Framework: Coordinating Protection Across Multiple Agencies, Sites, Contractors and One Neighborhood

The Gowanus Canal Community Advisory Group (CAG) proposes a collaborative Gowanus Protection Framework—built on transparent safety thresholds, clear monitoring protocols, single points of contact, and advance community notice—to ensure coordinated communication from the EPA, DEC, and DEP. We ask all three agencies to use our monthly General Meetings as the shared forum for regular updates on canal and upland remediation progress; in turn, the CAG will partner to spread this information and keep the community fully informed. To that end, the CAG asks the EPA, DEC, and DEP to adopt this framework.

Why The Gowanus Protection Framework Is Needed

The Gowanus Canal and neighborhood is undergoing remediation overseen by multiple agencies:

- Dredging of canal contamination, overseen by the US Environmental Protection Agency (EPA) under the Superfund program;
- Remediation of upland brownfield sites under the New York State Department of Environmental Conservation (DEC) Superfund and Brownfield programs; and
- Construction of two massive sewage retention tanks by the New York City Department of Environmental Protection (DEP), overseen by the EPA under the Superfund program

These overlapping activities are addressing longstanding neighborhood contamination — but they are also causing significant ground disturbance, with real risks of contamination exposure and quality of life impacts in a densely populated urban neighborhood.

Gowanus neighbors have lived with the disruptive impacts of remediation for decades. The complexity increases significantly when multiple adjacent sites are active simultaneously. In recent years, several excavations were underway around the Fulton Manufactured Gas Plant (MGP) site, overseen by different agencies. Residents reported strong mothball odors and numerous complaints were documented.[1] It was difficult even for the agencies to pinpoint which site the odors were coming from, leaving community members without clear information about what they were smelling and whether it was unsafe. When neighbors reported noxious odors, they were often ignored and dismissed. Calls for coordination across agencies went unheeded, leaving residents without clear answers for months. What happened there remains a source of justified concern for people who live, work, learn, and play in the neighborhood.

More remediation is ahead: excavation is underway at the Owl's Head sewage retention tank; cleanup at the Citizens MGP site is imminent; and the second phase of canal dredging in RTA 2, between 3rd Street and Hamilton Avenue, is scheduled to begin 2028.

The Gowanus Canal Community Advisory Group (CAG) wholeheartedly supports these cleanup efforts. But residents, schools, businesses, and public spaces experience their impacts cumulatively — dust, odors, trucking, noise, and air quality concerns do not occur in isolation when multiple projects are active in the same neighborhood.

To that end, we are proposing a framework that acknowledges the agencies' work to remove neighborhood contamination while asking for more transparent and accessible communication and agency response. Specifically, we ask agencies to use the CAG's monthly General Meetings — an existing forum already in place — as the mechanism for coordinating community-facing information across projects, not only at the individual site level but at the neighborhood scale. The CAG commits to supporting the dissemination of this information to the broader community.

The Framework
Recent CAG discussions with EPA and DEP on the Owl's Head site clarified how air quality and odors are monitored, what data are collected, what thresholds trigger protective actions, and who residents should contact with complaints. DEP's contractor AECOM has also been reaching out proactively to nearby residents and businesses with postcards about the upcoming remediation activities.

Together — monitoring networks, action thresholds, single points of contact, and pre-work outreach — these elements model a protective framework that should apply not just to Owls Head, but for the remediation moving forward, including at the Citizen's site and RTA 2.

We know that DEP, DEC and the EPA each already implement some version of this oversight. We are asking all three agencies to commit to a regular, predictable rhythm of communication — using the CAG's monthly General Meetings as the shared forum — and to report against a common set of information: what is being monitored, what thresholds trigger protective actions, and what those actions are. This allows the broader neighborhood to understand what is happening across all sites, hold agencies to consistent expectations, and track progress and raise concerns month by month.

What We Ask of the Agencies

<u>Communications & Coordination</u>
Pre-Project Briefings: Before breaking ground, the CAG asks each agency to present remediation plans at a monthly CAG General Meeting that's open to the public, covering scope, timeline, how health and quality of life impacts will be monitored, what actions will be triggered if thresholds are exceeded, and the designated community contact for questions, issues and complaints.

Community Outreach: The CAG asks each agency to adopt the proactive postcard and direct messaging model used by DEP/AECOM to reach residents, businesses, schools, and daycares with clear contact information for reporting issues.

Single Point of Contact: The CAG asks each agency to share the contact information and the name of the primary contact for complaints, with a named escalation contact and their contact information if a timely response is not received.

Monthly Progress Reports: The CAG asks DEC and DEP to join the EPA in presenting monthly remediation updates at CAG General Meetings, so the community can track milestones, ask questions, and raise concerns.

Interagency Coordination: The CAG asks each agency and their contractors to use the CAG's monthly General Meetings as the primary forum for sharing information across overlapping projects — including air monitoring results, odor events, trucking routes, schedules, and community complaints. Consistent participation by all three agencies is essential to reduce cumulative impacts, avoid conflicting public messaging, and ensure residents know who is responsible for responding to their concerns.

<u>Monitoring & Reporting</u>
Air Quality Monitoring: The CAG asks each agency to deploy monitoring not only at the site perimeter but at nearby sensitive receptor locations — schools, daycares, and playgrounds. If an agency determines this is unnecessary, it should provide a written public explanation.

Particulate Monitoring (PM10): The CAG asks each agency to publicly disclose the action levels that trigger dust suppression and work stoppage, whether monitors are placed at sensitive receptor locations as well as the site perimeter, and whether more protective thresholds apply at those sensitive locations.

Odor Monitoring: Odor monitoring is the protection most directly felt by residents, yet the least standardized across the three agencies. We ask each agency to publicly disclose: how odor monitoring is conducted; whether it extends to sensitive receptor locations beyond the site perimeter; what constitutes a confirmed off-site odor event and who makes that determination; and the specific response timeline and suppression measures pre-positioned for deployment.

Naphthalene Monitoring: Naphthalene is the compound most directly associated with the odor complaints. We ask each agency to publicly disclose in language and data that is understandable to the average resident how naphthalene is monitored, and whether naphthalene-specific action levels have been established.

Escalation Thresholds: Each agency uses numerical thresholds for VOCs, PM10, odors and naphthalene that trigger increasingly protective responses — from work modification through work stoppage to tented containment. These thresholds vary across agencies, and are not always aligned with the community experience, particularly for noxious odors. We ask each agency to publicly disclose its full escalation framework, from first alert to work stoppage to full containment, and provide clarity about escalation protocol to address odors that impact quality of life

Near Real-Time Data: The CAG asks that all three agencies commit to making contractor-reported monitoring data publicly available through daily or weekly publication of real-time monitoring data from the CAMP monitors, or other relevant real-time monitors, with immediate (within 24 hours) community notification of any validated threshold exceedances and the corrective actions taken. We additionally want validated data from SUMMA canisters made publicly available as soon as possible. This allows the community to verify conditions as they occur, build trust in agency procedures, reduce confusion across overlapping projects, and make informed decisions about health and daily activities.

<u>A Note on DEC</u>

We understand this framework could be a large undertaking for DEC, given the number of neighborhood sites in its Brownfield and Superfund programs. However, DEC's InfoLocator tool is a cumbersome tool that many community members find challenging to navigate. In order to address the need for more accessible information about these sites, we ask that DEC:

1. *Hold bi-annual public meetings* that include:
    a. A forward-looking overview of all sites expected to start active remediation in the coming six months;
    b. A review of work completed in the past six months with attention to any issues; and
    c. Breakout time for neighbors to speak with agency staff about specific sites.

These meetings should include technical and legal DEC staff as well as DOH personnel in order to ensure that all the community's questions are answered, held in the neighborhood at times accessible to working residents.

2. *Send the CAG Outreach Committee an email before any site breaks ground,* including:

a. The remediation start date;
b. The link to the cleanup plan;
c. The link to the monitoring plan;
d. Site contact information.

The Outreach Committee will compile and publish this information on the CAG website.

3. *Email the Outreach Committee of the CAG when there is an exceedance that requires corrective action, so that CAG can help get the word out to the surrounding community*

What the CAG Commits To

By putting forth this framework and seeking the agreement of the EPA, DEC and DEP, the CAG commits to supporting the dissemination of this information to the broader community, through the following:

1. Host monthly CAG meetings that act as a central forum for the agencies to share information with the community on a regular basis about remediation plans and progress;
   a. Work to streamline and coordinate CAG agendas and discussion so that agencies can provide timely updates.

2. Play a productive role in the broader community to address issues, concerns, questions or complaints about the remediation impacts, including:
   a. Host annual Town Hall meetings where agencies provide high level overview and progress of all remediation activities, so that all neighbors are able to learn about the ongoing work;
   b. Manage an active website and social media presence that amplify agency updates;
   c. Manage a live list of active remediation projects, that compiles the above information provided by agencies; and
   d. Develop and implement an outreach plan to reach community members throughout the neighborhood that may not be represented on the CAG.

We appreciate your consideration. If you have questions or comments, please reach out to Steve Marcus/Moderator of the Land Use Committee (stevemarcus7@gmail.com) or Jason Schwartzman/Moderator of the Outreach Committee (jischwartzman@gmail.com). We look forward to working proactively with you to ensure that the Gowanus community is aware and engaged in understanding ongoing remediation activities.

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[1] The eleven-month record of complaints can be found at: https://drive.google.com/file/d/1Qm__I6WRBKvt-ZJtwcIa7nvrYpaVG-A2/view?usp=drive_link

The Gowanus Protection Framework:
Coordinating Protection Across Multiple Agencies, Sites, Contractors and One Neighborhood

The Rationale For A Framework

The Gowanus Canal and neighborhood is undergoing numerous site investigation and remediation processes overseen by multiple different agencies, including:

- Dredging of contamination in the Canal, overseen by the Federal Environmental Protection Agency (EPA) under the Superfund program;
- Remediation of upland brownfield sites under the New York State Department of Environmental Conservation (DEC) Superfund and Brownfield programs;
- Construction of 2 massive sewage detention tanks that will reduce sewer overflow into the Canal, performed by NYC Department of Environmental Protection (DEP) overseen by EPA under the Superfund program.

Taken together, these overlapping remediation activities are addressing the long standing contamination in the neighborhood. However, they are also causing a high level of ground disturbance, which brings both the risk of contamination exposure and quality of life impacts in our urban neighborhood.

Over the past decades, since the cleanup activities started in earnest in the 2000's, Gowanus neighbors have lived with the disruptive impacts of the remediation process. The complexity increases significantly when multiple adjacent sites are active simultaneously. This is particularly complicated when there are multiple adjacent sites. In the past few years, several excavations were underway around the Fulton Manufactured Gas Plant (MGP) site, overseen by different agencies. Residents reported strong mothball odors, and numerous complaints were documented[1]. It was difficult even for the agencies to pinpoint which site odors were coming from, which left community members without clear information about what they were smelling and whether it was unsafe. Calls for coordination across agencies went unheeded, leaving residents without clear answers for months. What happened there remains a source of justified concern for people who live, work, learn, or play in the neighborhood.

We know that there is more neighborhood remediation ahead. The second phase of dredging in Remedial Target Area 2 (RTA 2), between 3rd St and Hamilton, is scheduled to begin in 2028. There will be additional clean-up at the Citizens MGP site, with an imminent start date. Excavation is underway at the Owl's Head sewage detention tank at the Salt Lot. Though we at the Gowanus Canal Community Advisory Group (CAG) wholeheartedly support these cleanup efforts, there is a need to take a hard look at the systems by which our community learns about these efforts and the ways that they may impact our day-to-day lives. While each agency oversees its own site-specific process, residents, schools, businesses, and public spaces experience these impacts cumulatively. Dust, odors, trucking, noise, air quality concerns, and construction disruption do not occur in isolation when multiple remediation projects are active or planned in the same neighborhood.

To that end, we are proposing a framework for the work ahead, that acknowledges the work that the agencies are overseeing to remove neighborhood contamination but asks for more transparent and accessible communication and agency response. Specifically, we ask agencies to use the CAG's monthly General Meetings — an existing forum already in place — as the mechanism for coordinating community-facing information across projects, not only at the individual site level but at the

[1]Eleven month record of complaints can be found at:
https://drive.google.com/file/d/1Qm__l6WRBKvt-ZJtwcIa7nvrYpaVG-A2/view?usp=drive_link

neighborhood scale. As part of this framework, the CAG commits to supporting the dissemination of this information to the broader community.

The Framework

Recent CAG discussions with the EPA and DEP for the Owl's Head site clarified how air quality and odors are monitored, what are the critical data, and what remediation actions are triggered by those data. DEP also made clear the single point of contact should community residents have complaints, and if frustrated, to whom to escalate those complaints. Lastly, AECOM--NYC DEP's Owl's Head contractor--has been reaching out to the nearby community with postcards to forewarn residents and businesses about the upcoming remediation activities.

Together, these elements--the number and array of monitoring instruments around a site, the data that's monitored, the data thresholds that escalate remediation actions, single points of contact for complaints, and pre-work outreach--have modeled a protective framework not just for Owl's Head, but for the remediation moving forward, including at Citizen's site and RTA 2.

We know that DEP, DEC and EPA each already implement different versions of this oversight. We are asking for a standardized response in order for the broader neighborhood to understand the remediation processes, create shared expectations, and have a central forum for tracking progress and resolving issues.

Communications & Coordination

1. *Pre-Project Information:* That all agencies present plans for site remediation at a public meeting before breaking ground. This presentation should cover the scope of activities, expected timeline, how impacts to health and quality of life will be monitored, what actions will be triggered should threats be realized, and the single point of contact for questions, issues and complaints.

2. *Standardized Outreach & Preparation:* That agencies adopt the proactive "postcard and direct messaging" model used by NYC DEP/AECOM to reach residents, businesses, schools and day care facilities with information that includes clear contact information for reporting issues.

3. *Single point of contact:* That agencies clearly designate a primary point of contact for complaints and include the escalation contact if a timely response is not received.

4. *Public Reports:* That NYS DEC and NYC DEP join the EPA in presenting monthly remediation progress reports at CAG General Meetings. These briefings are essential opportunities for the community to track milestones, ask questions, and raise critical issues.

5. *Interagency Coordination:* That NYC DEP, NYS DEC, EPA, and their contractors use the CAG's monthly General Meetings as the primary forum for sharing information across overlapping remediation activities, including air monitoring results, odor events, trucking routes, project schedules, and community complaints. Consistent participation by all three agencies is essential to reduce cumulative neighborhood impacts, avoid conflicting public messaging, and ensure that residents know which agency or contractor is responsible for responding to their concerns.

Monitoring & Reporting

1. *Air quality monitoring:* That each agency deploy a monitoring network not only at the site perimeter but at a sample of nearest sensitive receptor locations — schools, daycares, and playgrounds. If an agency determines this is not necessary, they should provide a public written explanation.

2. *PM10 monitoring:* Particulate matter monitoring is a component of each agency's air monitoring framework. The thresholds that trigger dust suppression and work stoppage vary by regulatory framework. We ask each agency to publicly disclose:
   - Action levels that trigger dust suppression and work stoppage;
   - If stations are placed at sensitive receptor locations as well as at the site perimeter, and if more conservative thresholds apply at the sensitive receptor locations than at the site perimeter.

3. *Odor monitoring:* Odor monitoring is the dimension of community protection most directly experienced by residents, businesses, schools, and daycares. Yet it is also the least standardized across the three agencies' frameworks. We ask each agency to publicly disclose:
   - How odor monitoring is conducted--instrument-based, field observation, etc.;
   - Whether odor monitoring occurs at sensitive receptor locations beyond the site perimeter or only within the work zone and at the site boundary;
   - What constitutes a confirmed off-site odor event and who makes that determination;
   - The specific response timeline and pre-positioned suppression measures ready for deployment.

4. *Naphthalene Monitoring:* Naphthalene is the compound most directly associated with the odor complaints. We ask each agency to publicly disclose how naphthalene is monitored at its site, and whether naphthalene-specific action levels have been established.

5. *Thresholds:* Each agency uses numerical thresholds - for total VOCs, for PM10, and for odors - that trigger increasingly protective responses, from initial work modification through work stoppage and ultimately to tented containment. These thresholds vary significantly across sites and the three regulatory frameworks. We ask each agency to publicly disclose its full escalation framework for VOCs, PM10 and odors, from work modification to work stoppage and full tented containment.

6. *Near Real-Time Data Transparency:* We ask the NYC DEP, NYS DEC, and the EPA to commit to making monitoring data currently reported by contractors publicly available in near real-time. This allows the community to verify air quality and odor conditions as they occur, build trust in agency procedures, reduce confusion across overlapping projects, and make informed decisions about health and daily activities.

What The CAG Commits To

By putting forth this framework and seeking the agreement of the EPA, DEC and DEP, the CAG commits to supporting the dissemination of this information to the broader community, through the following:

1. Host monthly meetings that act as a central forum for the agencies to share information with the community on a regular basis about remediation plans and progress;

2. Play a productive role in the broader community to address issues, concerns, questions or complaints about the remediation impacts, including:
   a. Host annual Town Hall meetings where agencies ;
   b. Manage an active website and social media presence that amplify agency updates;

c. Manage a live list of active remediation projects, that compiles the above information provided by agencies; and
d. Develop and implement an outreach plan to reach community members throughout the neighborhood that may not be represented on the CAG.

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The Gowanus Protection Framework: Coordinating Protections Across Multiple Agencies, Sites, Contractors and One Neighborhood

The Rationale For A Framework

The Owl's Head excavation will soon be joined by remediation activities at the former Citizen's MGP site (459 Smith Street, Building A, and potentially the balance of Parcels 1 and 2), and the dredging of the Canal in RTA2. Taken together, these overlapping remediation activities represent a high level of ground disturbance linked to one MGP-related source, with the risk of contamination exposure, and quality of life (odors, dust) impacts in the same densely populated stretch of the neighborhood.

The Gowanus neighborhood already has direct experience with what happens when coal tar-contaminated material is disturbed: during the Red Hook CSO tank excavation beginning in 2023, residents reported strong mothball odors almost immediately, and numerous complaints were documented. The experience was deeply frustrating. The Owl's Head, Citizens MGP excavation and the forthcoming RTA2 dredging of the Gowanus Canal will disturb coal tar-contaminated material at a scale that makes a repeat of that experience not only possible, but likely.[2]

The Gowanus Canal Community Advisory Group (CAG) has therefore turned its attention to the standards and procedures that NYC DEP (Owl's Head), NYS DEC (Citizen's sites) and the EPA (RTA 2) will use to control and monitor contaminants, odors and dust that can put residents' health and quality of life at risk. Recent CAG discussions with the EPA and NYC DEP for the Owl's Head site clarified how air quality and odors are monitored, what are the critical data, and what remediation actions are triggered by those data. NYC DEP also made clear the single point of contact should community residents have complaints, and if frustrated, to whom to escalate those complaints. Lastly, AECOM--NYC DEP's Owl's Head contractor--has been reaching out to the nearby community with postcards to forewarn residents and businesses about the upcoming remediation activities.

Together, these elements--the number and array of monitoring instruments around a site, the data that's monitored, the data thresholds that escalate remediation actions, single points of contact for complaints, and pre-work outreach--have modeled a protective framework not just for Owl's Head, but for the Citizen's site and RTA 2. The CAG is seeking the engagement and agreement of the EPA, NYS DEC and NYC DEP to make this framework a reality.

The Framework

1. *Unified Pre-Work Transparency:* The NYC DEP (Owl's Head) and the EPA (Thomas Greene Park) have made presentations at the CAG General Meetings in advance of planned remediation activities. We ask that this become the standard--that CAG General Meetings be the venue for NYC DEP, NYS DEC, and the EPA to share project details before breaking ground on the Citizen's site or RTA 2, covering such things as the scope of activities, expected timeline, how those threats to health and quality of life will be monitored and actions that will be triggered should threats be realized, and the single point of contact for questions, issues and complaints.

[2] The CAG has been informed by the EPA and NYC DEP that the Owl's Head site has a low likelihood of triggering strong odors. RTA 1 and past excavation activity at the Citizen's site released strong odors.

2. *Standardized Outreach & Preparation:* The CAG asks that all three agencies adopt the proactive "postcard and direct messaging" model used by NYC DEP/AECOM for Citizen's and RTA 2 to reach residents, businesses, schools and day care facilities with information that includes clear contact information for reporting issues.

3. *Air quality monitoring:* We ask that each agency deploy a monitoring network not only at the site perimeter but at a sample of nearest sensitive receptor locations — schools, daycares, and playgrounds. If an agency determines this is not necessary, we ask for an explanation.

4. *PM10 monitoring:* Particulate matter monitoring is a component of each agency's air monitoring framework. The thresholds that trigger dust suppression and work stoppage vary by regulatory framework. We ask each agency to publicly disclose:
   - Action levels that trigger dust suppression and work stoppage;
   - If stations are placed at sensitive receptor locations as well as at the site perimeter, and if more conservative thresholds apply at the sensitive receptor locations than at the site perimeter.

5. *Odor monitoring:* Odor monitoring is the dimension of community protection most directly experienced by residents, businesses, schools, and daycares. Yet it is also the least standardized across the three agencies' frameworks. We ask each agency to publicly disclose:
   - How odor monitoring is conducted--instrument-based, field observation, etc.;
   - Whether odor monitoring occurs at sensitive receptor locations beyond the site perimeter or only within the work zone and at the site boundary;
   - What constitutes a confirmed off-site odor event and who makes that determination;
   - The specific response timeline and pre-positioned suppression measures ready for deployment.

6. *Thresholds:* Each agency uses numerical thresholds - for total VOCs, for PM10, and for odors - that trigger increasingly protective responses, from initial work modification through work stoppage and ultimately to tented containment. These thresholds vary significantly across the three sites and three regulatory frameworks. We ask each agency to publicly disclose its full escalation framework for VOCs, PM10 and odors, from work modification to work stoppage and full tented containment.

7. *Near Real-Time Data Transparency:* We ask the NYC DEP, NYS DEC, and the EPA to commit to making monitoring data currently reported by contractors publicly available in near real-time. This allows the community to verify air quality and odor conditions as they occur.

8. *Single point of contact:* Following the model established by the NYC DEP, we ask that the NYS DEC and EPA clearly designate a primary point of contact for complaints and include the escalation contact if a timely response is not received.

9. *Public Reports:* We ask that the NYS DEC and NYC DEP join the EPA in presenting monthly remediation progress reports at CAG General Meetings. These briefings are essential for the community to track milestones, ask questions, and raise critical neighborhood issues.

What The CAG Commits To

By putting forth this framework and seeking the agreement of the EPA, NYS DEC and NYC DEP, the CAG has four objectives:

1) To be a central forum for the EPA, NYS DEC and NYC DEP to share information with the community on a regular basis about their plan and progress during the excavation of contamination at Owl's Head, Citizens and RTA2;

2) To play a productive role in messaging to the community what to expect and what businesses, schools, day care centers and residents can do should they have questions or complaints during the upcoming and overlapping excavations;

3) To be an efficient and open channel of communication with the NYC DEP, NYS DEC, and the EPA to address issues, concerns, questions or complaints that may come up during the excavations;

4) To reduce the risk that community concerns will not be addressed in a timely way, or that conflicting responses from multiple contractors and multiple oversight agencies will leave the neighborhood in limbo while its quality of life is suffering.

Summary

The nine points, taken together, establish the community's expectations for how its safety and quality of life will be protected during the excavation of Owl's Head, Citizen's and RTA 2. At the same time, each point articulates what are the parameters for mitigation actions should either/both of these happen: a) Excavation exposes toxins/odors that exceed thresholds; b) Contractor practices violate standards.

With the above in mind, the CAG has crafted the Gowanus Protection Framework for the NYC DEP, NYS DEC and the EPA's Gowanus Team to agree to so that their remediation activities at Owl's Head, the Citizen's sites, and RTA 2 are understood by the community, create shared expectations, and provide a central forum for tracking progress and resolving issues.