

August 12, 2024

Revised December 9, 2024

Revised July 25, 2025

Mr. Richard P. Mustico
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233

**Re: Request for Reduction of Frequency of Groundwater Monitoring and Sampling Plan
Gowanus Village I Site BCP #C224099/ USEPA Consent Order #CERCLA-02-2017-2021
322 3rd Avenue (Formerly 153 2nd Street), Brooklyn, New York**

Dear Mr. Mustico:

On behalf of BRT Powerhouse, LLC (current site owner), Roux Environmental Engineering and Geology, D.P.C. (Roux) has prepared this request for modification (2024 Monitoring Modification Request) for the Gowanus Village I Site located at 322 3rd Avenue (Formerly 153 2nd Street), Brooklyn, New York (Site). This request is to modify the monitoring and sampling plan outlined in the Site Management Plan Revision No. 1 approved by NYSDEC on July 29, 2020 (SMP), and the Request for Modification to Monitoring and Sampling Plan letter previously approved by the NYSDEC on April 7, 2022 (2022 Monitoring Modification Request). The proposed 2024 modifications are based on an evaluation of compiled groundwater gauging and analytical data collected from January 2018 through October 2024. This is a revision of the memorandum of the same title dated August 12, 2024 to address comments provided by the NYSDEC in an email dated September 30, 2024 and includes a Groundwater Monitoring Network Trend Analysis compiling data from all ten monitoring wells at the Site as Attachment 1.

Roux is requesting the reduction in frequency of gauging and groundwater sampling events of monitoring wells MW-13, MW-14, MW-16R, and MW-17R from quarterly to once every five quarters and the decommissioning of monitoring wells MW-9, MW-10R, MW-11, MW-12, MW-15 and MW-18R, as shown in Figure 1. Roux is proposing to decommission these wells because the groundwater analytical data collected from 2018 through 2024 has remained static or in decline, as justified further in Attachment 1 – Groundwater Monitoring Network Trend Analysis. Groundwater contour maps have been prepared based on the July 2020 (Figure 2) and June 2024 (Figure 3) monitoring well gauging events which illustrate that the groundwater flow direction has remained consistent and the monitoring wells to remain onsite will provide adequate spatial distribution along the downgradient perimeter of the Site.

Onsite Monitoring Well Network and Groundwater Quality

The current onsite monitoring well network is comprised of monitoring wells MW-9, MW-10R, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16R, MW-17R, and MW-18R. Concentrations of volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs) have been static or decreasing since quarterly groundwater gauging and sampling first commenced in 2018 and is demonstrated in groundwater analytical data and monitoring well gauging summary tables which have been provided to NYSDEC on a quarterly basis through the submittal of Groundwater Sampling Results Summary letters. LNAPL has not been detected at any monitoring wells since November 2022.

Proposed Modifications to Monitoring and Sampling Plan

Based on the gauging and analytical data collected at the Site, Roux is requesting to decommission monitoring wells MW-9, MW-10R, MW-11, MW-12, MW-15, and MW-18R, and to reduce the frequency of gauging and groundwater sampling events of the remaining monitoring wells MW-13, MW-14, MW-

16R, and MW-17R from quarterly to once every five quarters, to continue to monitor the concentrations and migration of contaminants throughout the Site. We are proposing to decommission the above monitoring wells due to the lack of detection exceedances and stagnating or declining concentrations, as further demonstrated in the Groundwater Monitoring Network Trend Analysis (Attachment 1). The analyte groups displayed represent the most significant and consistent exceedances of the Ambient Water Quality Standards and Guidance Values (AWQSGVs) for each monitoring well.

The attached Figure 1 shows the proposed modifications to the monitoring well network. The proposed monitoring well network will provide adequate spatial distribution along the downgradient perimeter with a focus on former source areas including the previously remediated lateral discharge tunnels within the boiler house slab and the residual contamination beneath the turbine hall building to ensure the revised program still adheres to the original goals. There is no clear indication of migration to downgradient to wells MW-13 and MW-14, which represent the Site perimeter. Continued monitoring of these wells will ensure onsite contamination does not migrate offsite. Additional rationale for the modification request for each well is provided in the table below, including the rationale for why each monitoring well was included in the original program.

Well ID	Modification Request	Rationale
MW-9	Decommission	MW-9 was installed to monitor the groundwater quality downgradient of the remaining contamination beneath the turbine hall building. Exceedances of VOCs and metals at MW-9 have demonstrated static or decreasing concentrations. Additionally, MW-13 and MW-14 are effective at monitoring groundwater quality hydraulically downgradient of MW-9. The revised program will still adhere to the original goals of the program.
MW-10R	Decommission	MW-10R was installed to provide groundwater analytical data upgradient of the remaining onsite contamination and provide a spatial distribution for groundwater elevation data. Groundwater samples collected at MW-10R have VOC (excluding benzene) and SVOC (excluding naphthalene) detections that have never yielded exceedances at any other onsite monitoring well. These contaminants represent offsite sources and are not indicative of Site conditions. Exceedances of VOCs and SVOCs at MW-10R have demonstrated static or decreasing concentrations.
MW-11	Decommission	MW-11 was installed to monitor the groundwater quality south of the remaining contamination beneath the turbine hall building. MW-11 demonstrates consistent analytical results with no exceedances of the AWQSGVs, excluding one minor exceedance of arsenic at MW-11 of 27.6 ug/L, exceeding the AWQSGVs standard of 25 ug/L in the third quarter 2023 sampling event. Monitoring well MW-11 has not yielded any further exceedances and demonstrates static or decreasing concentrations. Monitoring wells MW-13 and MW-14 are hydraulically downgradient of MW-11.
MW-12	Decommission	MW-12 was installed to monitor the groundwater quality adjacent to the Gowanus Canal. MW-12 demonstrates consistent analytical results with no exceedances of the AWQSGVs and has demonstrated static or decreasing concentrations. Monitoring wells MW-13 and MW-14 are hydraulically downgradient of MW-12.
MW-13	Continued Gauging/Monitoring	MW-13 and MW-14 were installed to monitor the groundwater quality adjacent to the Gowanus Canal.
MW-14	Continued Gauging/Monitoring	MW-13 and MW-14 are effective at monitoring groundwater quality in the areas directly west and hydraulically downgradient of the turbine hall and boiler house, as well as provide accurate perimeter monitoring to document that onsite groundwater contamination has not migrated offsite. These monitoring wells will continue to be

Well ID	Modification Request	Rationale
		gauged and sampled once every five quarters and the revised program will still adhere to the original goals of the program with the proposed changes.
MW-15	Decommission	MW-15 was installed to monitor groundwater quality in the vicinity of the historic coal tunnel. Downgradient wells MW-13 and MW-14 are effective at monitoring groundwater quality in the areas directly west and hydraulically downgradient of MW-15. These downgradient monitoring wells provide accurate perimeter monitoring to document that onsite groundwater contamination has not migrated offsite. The revised program will still adhere to the original goals of the program.
MW-16R	Continued Gauging/Monitoring	MW-16R and MW-17R locations were selected to align with the previously remediated lateral discharge tunnels located within the boiler house slab.
MW-17R	Continued Gauging/Monitoring	The gauging and sampling of these wells once every five quarters to provide accurate perimeter monitoring to document that onsite groundwater contamination has not migrated offsite. These monitoring wells will continue to be gauged and sampled once every five quarters.. The revised program will still program.
MW-18R	Decommission	MW-18R was installed to provide groundwater analytical data upgradient of the remaining onsite contamination and provide a spatial distribution for groundwater elevation data. MW-18R demonstrates consistent analytical results with no exceedances of the AWQSGVs.

Proposed Modification to Periodic Review Report Frequency

Redevelopment work at the Site is complete, therefore, the reporting frequency for future Periodic Review Reports (PRR) can be reduced to once every three years with NYSDEC-approval. If approved, inspections of the institutional controls (ICs) and engineering controls (ECs) will continue to be completed on an annual basis and inspection forms will be included in each PRR.

If you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.



Frank Cherena, P.G.
 Principal Geologist



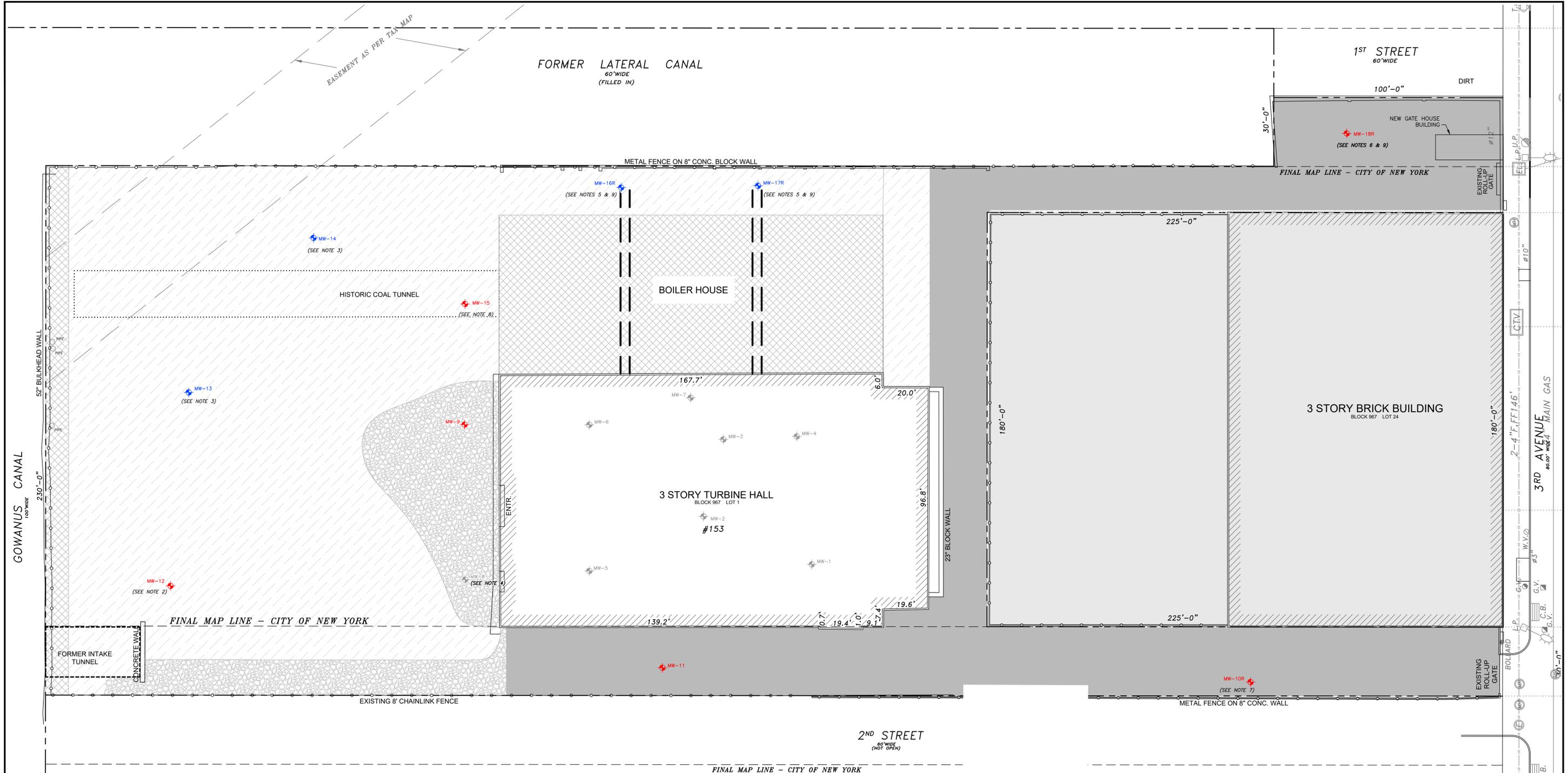
Charles McGuckin, P.E.
 Principal Engineer, Vice President

cc: Johnathan Greco, NYSDEC
 Steven Lawrence, NYSDOH
 Paul Parkhill, Gemini Arts Initiative, Inc.
 Larry Schnapf, Schnapf, LLC

**Request for Reduction of Frequency of Groundwater
Monitoring and Sampling Plan – Gowanus Village I Site
BCP #C224099/ EPA Consent Order #CERCLA-02-2017-2021
322 3rd Avenue, (Formerly 153 2nd Street), Brooklyn, New York**

FIGURES

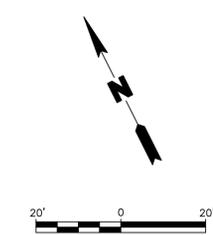
1. Monitoring Well Network
2. Groundwater Contour Map June 27, 2020
3. Groundwater Contour Map June 27, 2020



LEGEND

	EXISTING BUILDING OR STRUCTURE		MW-10	LOCATION AND DESIGNATION OF MONITORING WELL
	PROPERTY LINE		MW-8	LOCATION AND DESIGNATION OF FORMER MONITORING WELL
	FENCE LINE		MW-9	LOCATION AND DESIGNATION OF MONITORING WELL PROPOSED FOR DECOMMISSIONING
	EXISTING UNDERGROUND ELECTRIC			ASPHALT CAP
	EXISTING STORM WATER SEWER			CLEAN STONE
	EXISTING MANHOLE			EXISTING CONCRETE SLAB
	EXISTING STORM WATER DRYWELL			RECYCLED CONCRETE AGGREGATE
	APPROXIMATE LOCATION OF FORMER LATERAL DISCHARGE TUNNELS			

- NOTES**
1. BASE MAP PREPARED FROM SURVEY PERFORMED BY GARDEN STATE ENGINEERING SURVEYING & PLANNING IN JUNE 2022.
 2. MW-12 INSTALLED ON DECEMBER 18, 2019.
 3. MW-13 AND MW-14 INSTALLED ON FEBRUARY 20, 2020 AND FEBRUARY 21, 2020, RESPECTIVELY.
 4. MW-8 WAS DESTROYED DURING REDEVELOPMENT ACTIVITIES IN JUNE 2019.
 5. MW-16 AND MW-17 WERE DESTROYED DURING REDEVELOPMENT ACTIVITIES IN FEBRUARY 2020 AND WERE REINSTALLED AS MW-16R AND MW-17R, RESPECTIVELY, IN JUNE 2022.
 6. MW-18 WAS DESTROYED DURING REDEVELOPMENT ACTIVITIES IN MARCH 2021 AND WAS REINSTALLED AS MW-18R IN JUNE 2022.
 7. MW-10 WAS DESTROYED DURING REDEVELOPMENT ACTIVITIES IN NOVEMBER 2021 AND WAS REINSTALLED AS MW-10R IN JUNE 2022.
 8. MW-15 WAS INSTALLED IN MAY 2022.
 9. ABSORBENT SOCKS WERE REMOVED FROM MW-16R, MW-17R, AND MW-18R DURING FOURTH QUARTER 2022 SAMPLING EVENT. LNAPL HAS NOT BEEN DETECTED DURING SUBSEQUENT GAUGING AND SAMPLING EVENTS.



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DRAWING SCALE: AS SHOWN	PLOT SCALE: 1:1
DRAWING DATE: 08AUG24	PRINT TYPE: COLOR
OFFICE: NY	PAPER SIZE: ARCH D
PROJECT NO.: 2705.0001Y009	
DRAWING FILE: 2705.0001Y321.01.DWG	

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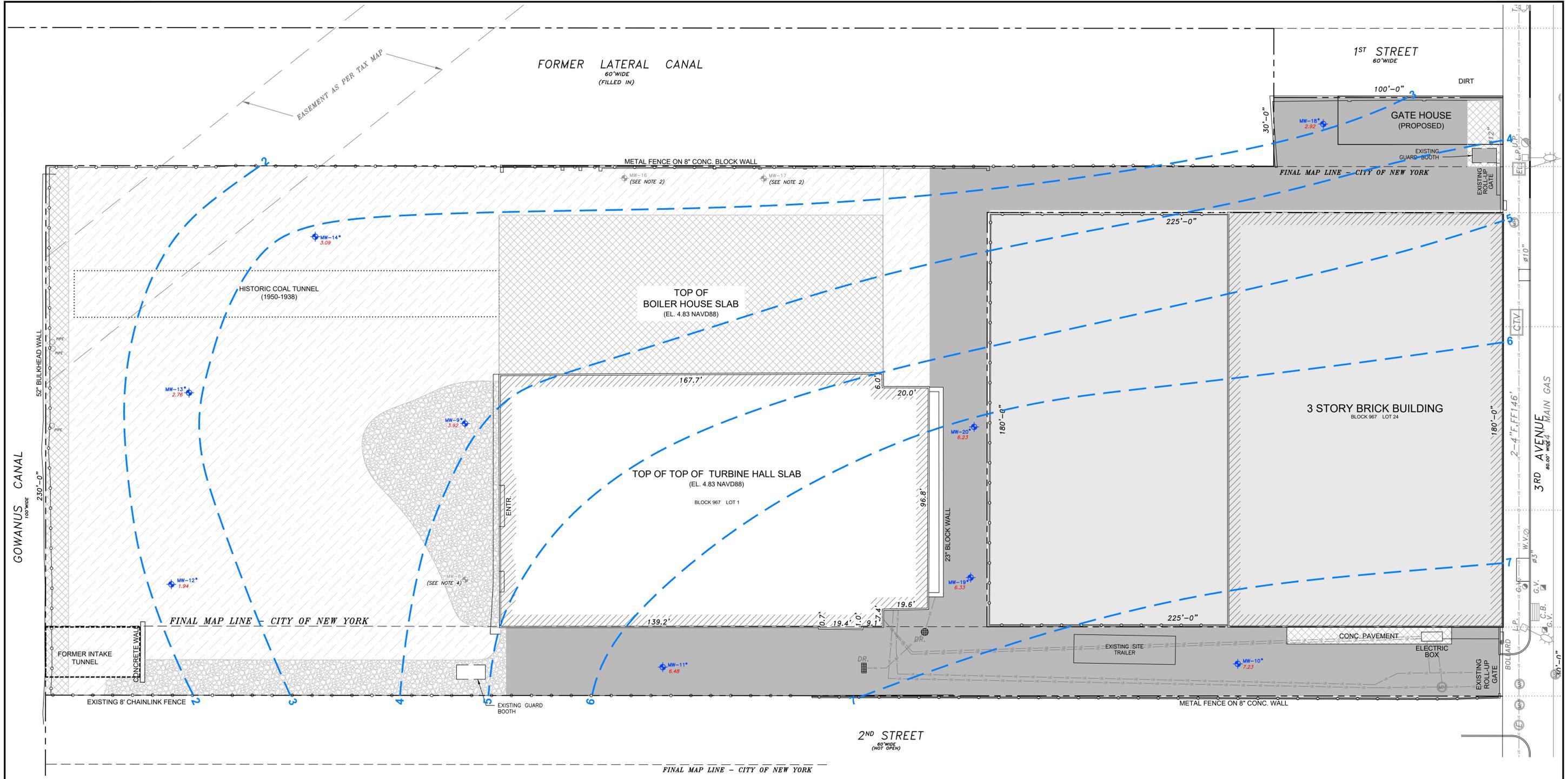
PROJECT NAME:
GOWANUS VILLAGE I, LLC - BROOKLYN, NEW YORK

PROJECT FOR:
BRT POWERHOUSE LLC

TITLE:
MONITORING WELL NETWORK

FIGURE
1
 OF 1

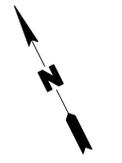
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LEGEND

	EXISTING BUILDING OR STRUCTURE		LOCATION AND DESIGNATION OF MONITORING WELL		2	LINE OF EQUAL GROUNDWATER ELEVATION, IN FEET RELATIVE TO THE NEW YORK STATE PLANE COORDINATE SYSTEM, (NAVD88). (DASHED WHERE INFERRED)
	PROPERTY LINE		LOCATION AND DESIGNATION OF DESTROYED MONITORING WELL		3.92	ELEVATION OF WATER TABLE ON JULY 27, 2020, IN FEET RELATIVE TO THE NEW YORK STATE PLANE COORDINATE SYSTEM, (NAVD88).
	FENCE LINE		ASPHALT CAP			MONITORING WELL ELEVATION USED FOR GROUNDWATER CONTOURS ON JULY 27, 2020
	EXISTING UNDERGROUND ELECTRIC		CLEAN STONE			
	EXISTING STORM WATER SEWER		EXISTING CONCRETE SLAB			
	EXISTING MANHOLE		RECYCLED CONCRETE AGGREGATE			
	EXISTING STORM WATER DRYWELL					

- NOTES**
1. BASE MAP PREPARED FROM SURVEY PERFORMED BY PERFECT POINT LAND SURVEYING, RT, JANUARY 2017.
 2. MW-16 AND MW-17 WERE DESTROYED DURING REDEVELOPMENT ACTIVITIES IN FEBRUARY 2020.
 3. ALL ELEVATION DATA IS IN FEET RELATIVE TO THE NEW YORK STATE PLANE COORDINATE SYSTEM, NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).
 4. MW-8 WAS DESTROYED DURING REDEVELOPMENT ACTIVITIES IN JUNE 2019.



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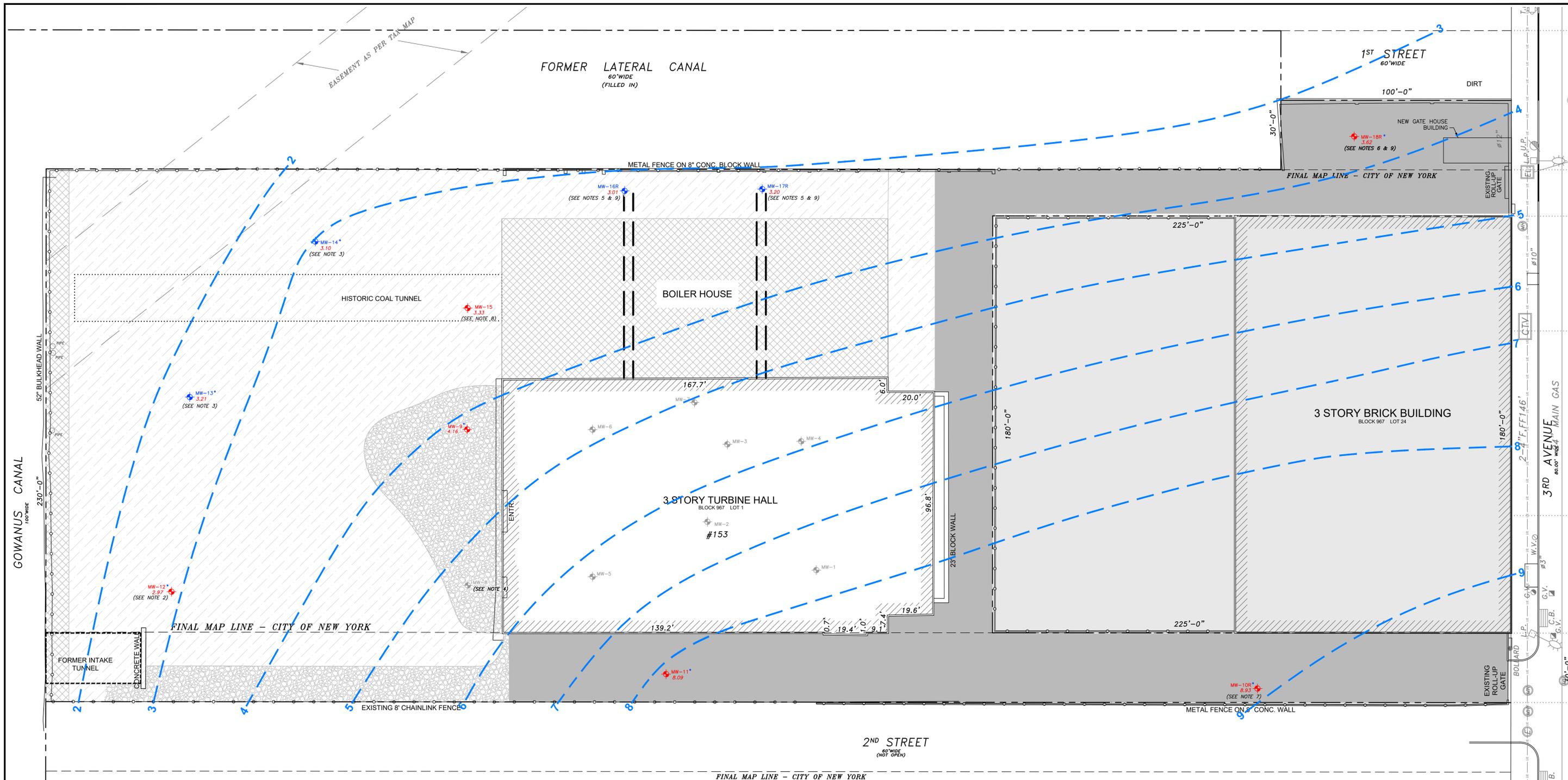
PROJECT NAME:
GOWANUS VILLAGE I, LLC - BROOKLYN, NEW YORK

PROJECT FOR:
BRT POWERHOUSE LLC

TITLE:
**GROUNDWATER CONTOUR MAP
JUNE 27, 2020**

FIGURE
2

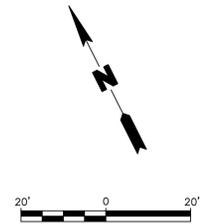
2 OF 3



LEGEND

	EXISTING BUILDING OR STRUCTURE		MW-10	LOCATION AND DESIGNATION OF MONITORING WELL		3	LINE OF EQUAL GROUNDWATER ELEVATION, IN FEET RELATIVE TO THE NEW YORK STATE PLANE COORDINATE SYSTEM, (NAVD88). (DASHED WHERE INFERRED)
	PROPERTY LINE		MW-8	LOCATION AND DESIGNATION OF FORMER MONITORING WELL		2.97	ELEVATION OF WATER TABLE ON JULY 27, 2020, IN FEET RELATIVE TO THE NEW YORK STATE PLANE COORDINATE SYSTEM, (NAVD88).
	FENCE LINE		MW-9	LOCATION AND DESIGNATION OF MONITORING WELL PROPOSED FOR DECOMMISSIONING			MONITORING WELL ELEVATION USED FOR GROUNDWATER CONTOURS ON JUNE 17, 2024
	EXISTING UNDERGROUND ELECTRIC			ASPHALT CAP			
	EXISTING STORM WATER SEWER			CLEAN STONE			
	EXISTING MANHOLE			EXISTING CONCRETE SLAB			
	EXISTING STORM WATER DRYWELL			RECYCLED CONCRETE AGGREGATE			
	APPROXIMATE LOCATION OF FORMER LATERAL DISCHARGE TUNNELS						

- NOTES**
- BASE MAP PREPARED FROM SURVEY PERFORMED BY GARDEN STATE ENGINEERING SURVEYING & PLANNING IN JUNE 2022.
 - MW-12 INSTALLED ON DECEMBER 18, 2019.
 - MW-13 AND MW-14 INSTALLED ON FEBRUARY 20, 2020 AND FEBRUARY 21, 2020, RESPECTIVELY.
 - MW-8 WAS DESTROYED DURING REDEVELOPMENT ACTIVITIES IN JUNE 2019.
 - MW-16 AND MW-17 WERE DESTROYED DURING REDEVELOPMENT ACTIVITIES IN FEBRUARY 2020 AND WERE REINSTALLED AS MW-16R AND MW-17R, RESPECTIVELY, IN JUNE 2022.
 - MW-18 WAS DESTROYED DURING REDEVELOPMENT ACTIVITIES IN MARCH 2021 AND WAS REINSTALLED AS MW-18R IN JUNE 2022.
 - MW-10 WAS DESTROYED DURING REDEVELOPMENT ACTIVITIES IN NOVEMBER 2021 AND WAS REINSTALLED AS MW-10R IN JUNE 2022.
 - MW-15 WAS INSTALLED IN MAY 2022.
 - ABSORBENT SOCKS WERE REMOVED FROM MW-16R, MW-17R, AND MW-18R DURING FOURTH QUARTER 2022 SAMPLING EVENT. LNAPL HAS NOT BEEN DETECTED DURING SUBSEQUENT GAUGING AND SAMPLING EVENTS.
 - ALL ELEVATION DATA IS IN FEET RELATIVE TO THE NEW YORK STATE PLANE COORDINATE SYSTEM, NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).



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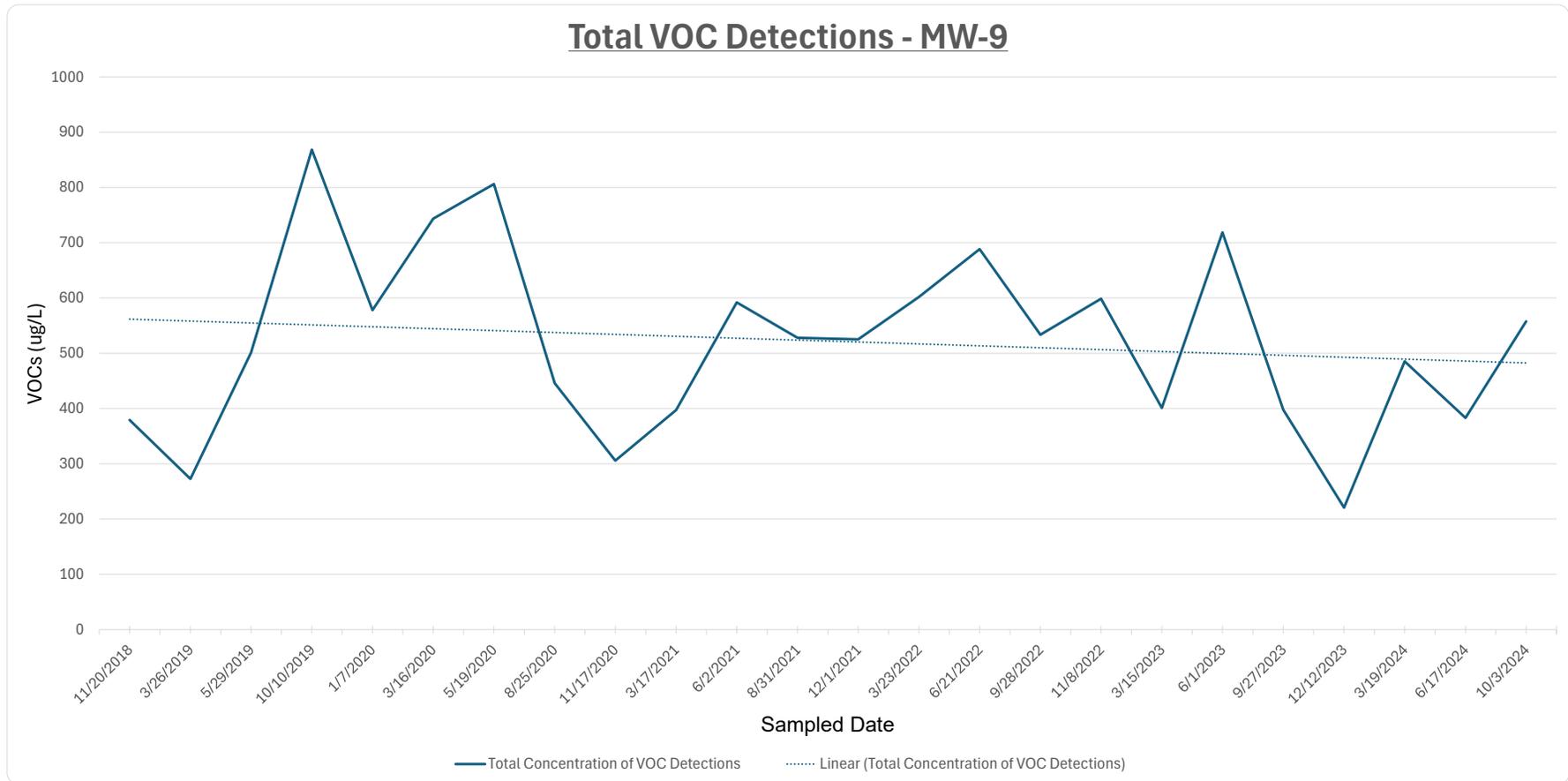
TITLE:
**GROUNDWATER CONTOUR MAP
JUNE 17, 2024**

FIGURE
3
FIGURE
3 OF 3

**Request for Reduction of Frequency of Groundwater
Monitoring and Sampling Plan – Gowanus Village I Site
BCP #C224099/ EPA Consent Order #CERCLA-02-2017-2021
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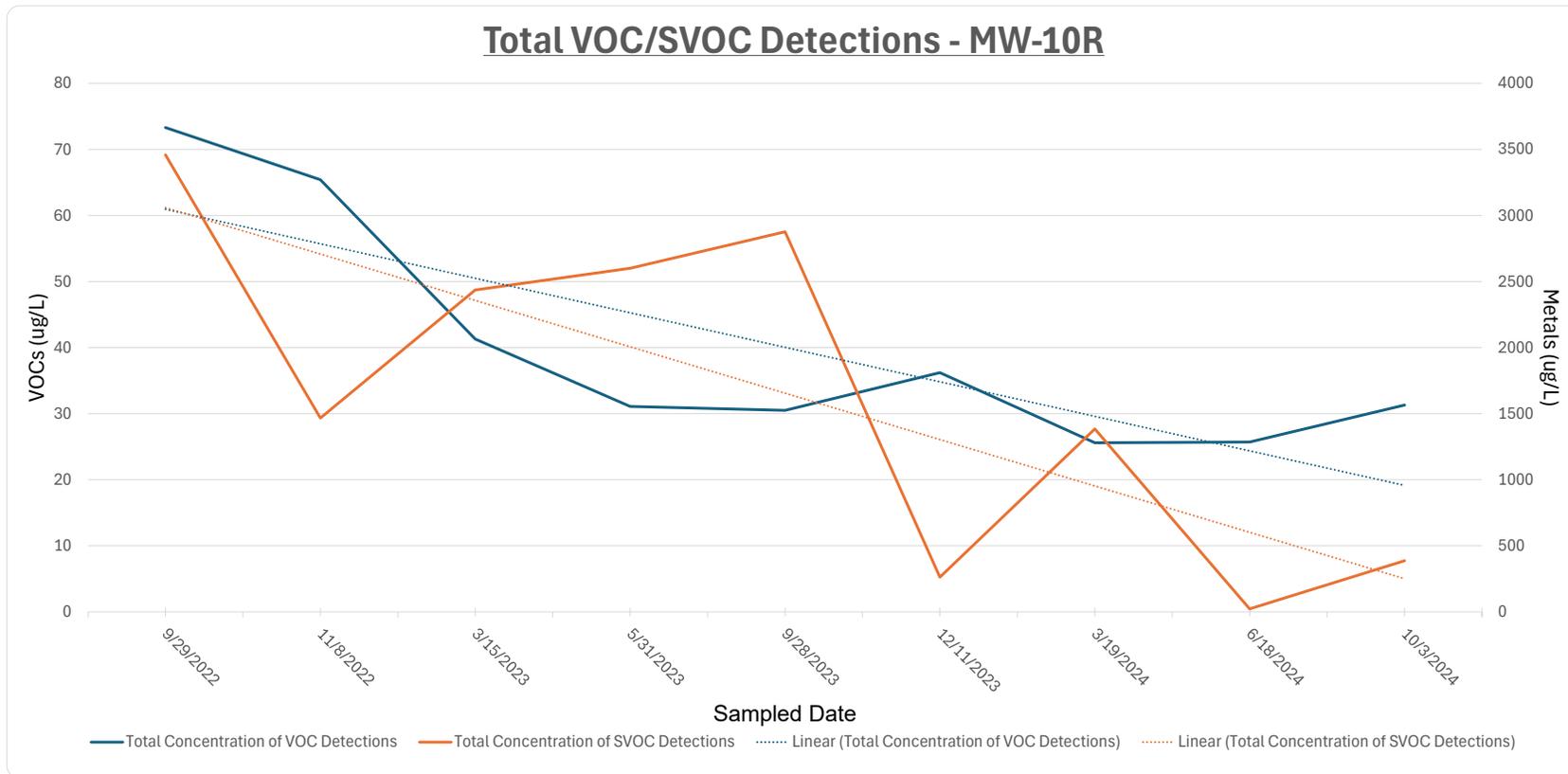
ATTACHMENT 1

Groundwater Monitoring Network Trend Analysis



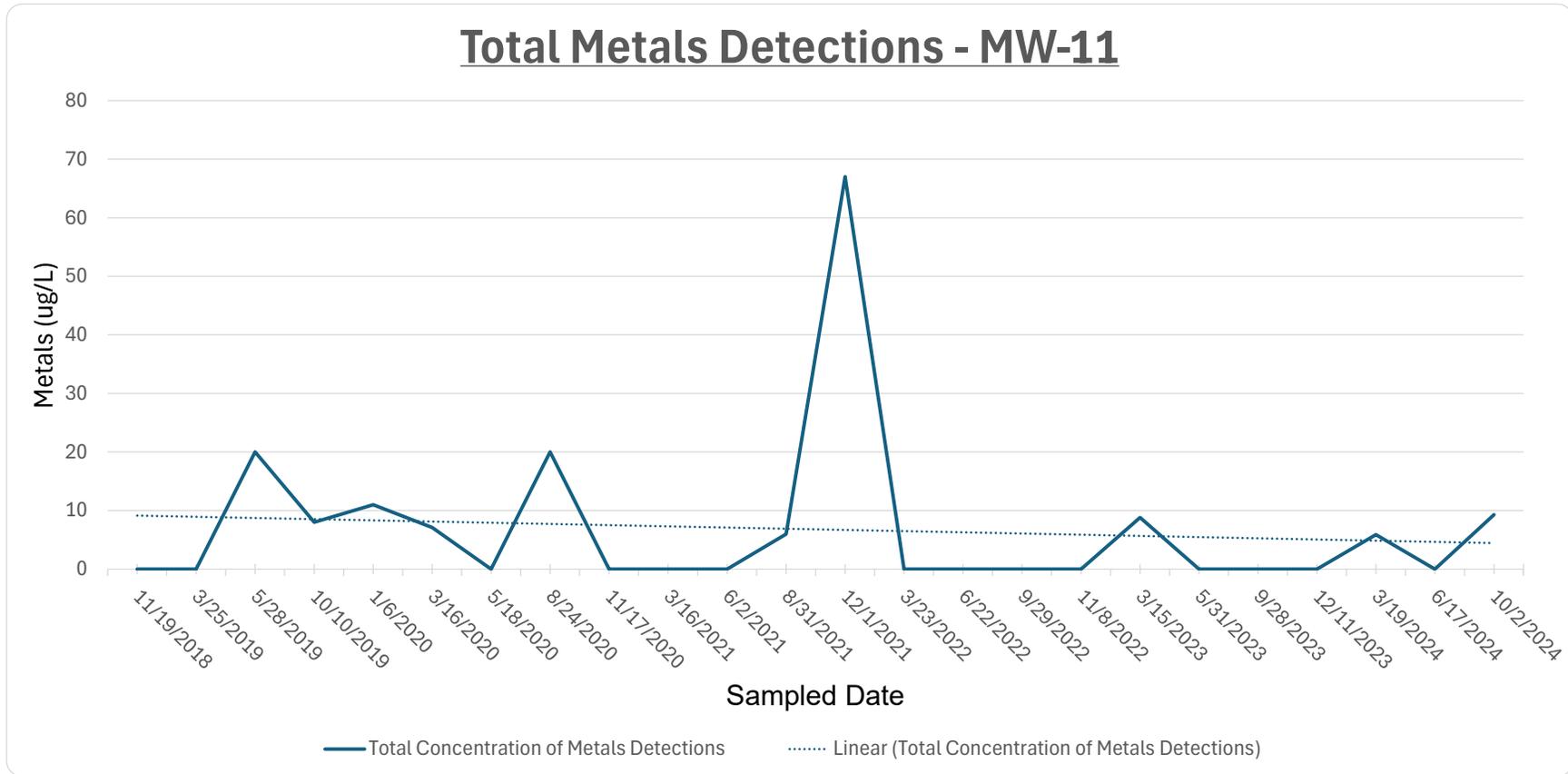
1. Exceedances of VOCs and concentrations of metals at MW-9 have demonstrated generally static or decreasing concentrations.
2. No SVOC, metals, cyanide, or PCB exceedances have occurred at MW-9.
3. VOC exceedances at MW-9 are limited to 1,2-dichlorobenzene, 1,3-dichlorobenzene, 1,4-dichlorobenzene, benzene, and chlorobenzene.

MW-9 is proposed for decommissioning.



1. Exceedances of VOCs and SVOCs at MW-10R have demonstrated decreasing concentrations.
2. No metals, cyanide, or PCB exceedances have occurred at MW-10R.
3. VOC exceedances are limited to benzene, ethylbenzene, isopropylbenzene, and o-xylene.
4. SVOC exceedances are limited to 1,1'-Biphenyl, acenaphthene, benzo(a)anthracene, chrysene, fluorene, naphthalene, and phenanthrene.
5. Acetone, a common laboratory that has not shown historic detections was detected at MW-10R during the third quarter 2024 sampling event and was excluded from this trend analysis.

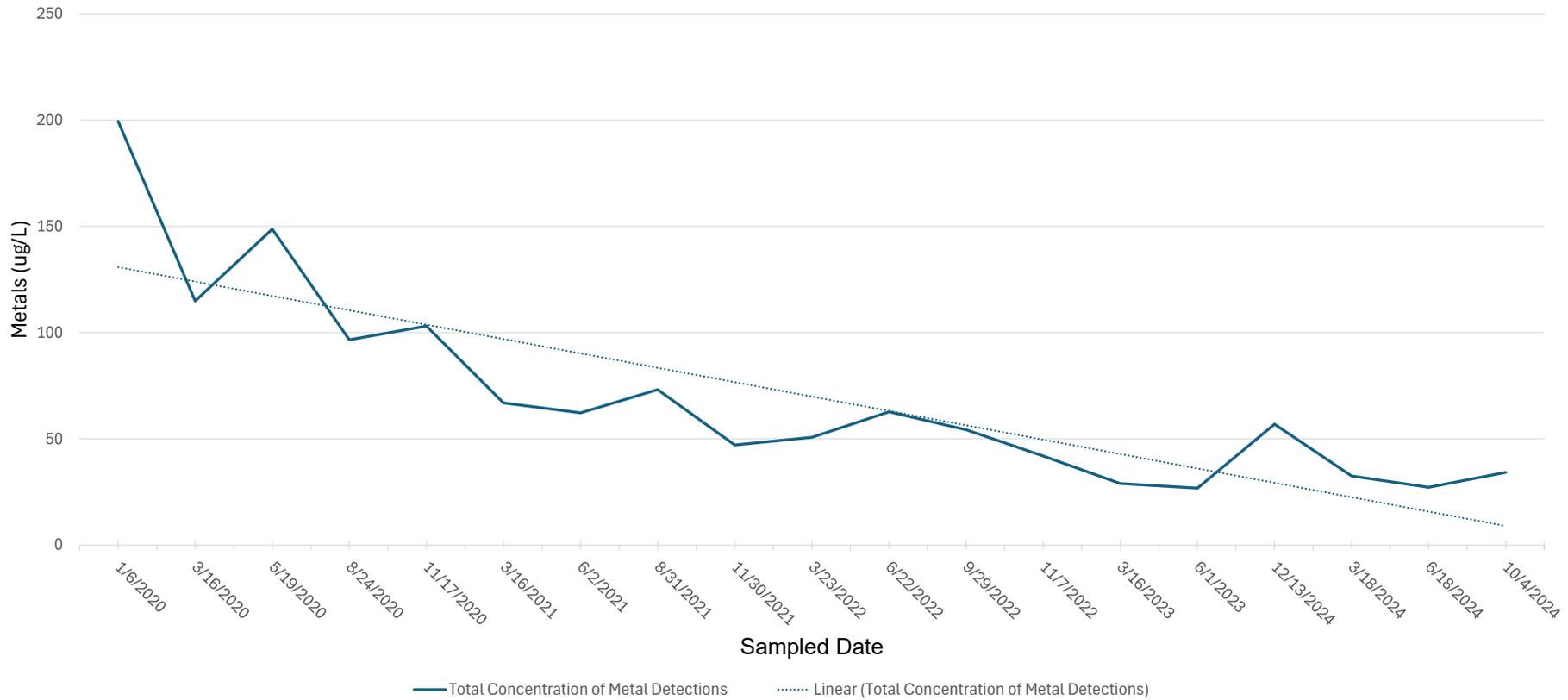
MW-10R is proposed for decommissioning.



1. Concentrations of VOCs and exceedances of metals at MW-11 have demonstrated static or decreasing concentrations.
2. No VOC, SVOC, cyanide, or PCB exceedances have occurred at MW-11.
3. Metals exceedances at MW-11 are limited to lead and total arsenic and have not been recorded since the third quarter 2021 sampling event.

MW-11 is proposed for decommissioning.

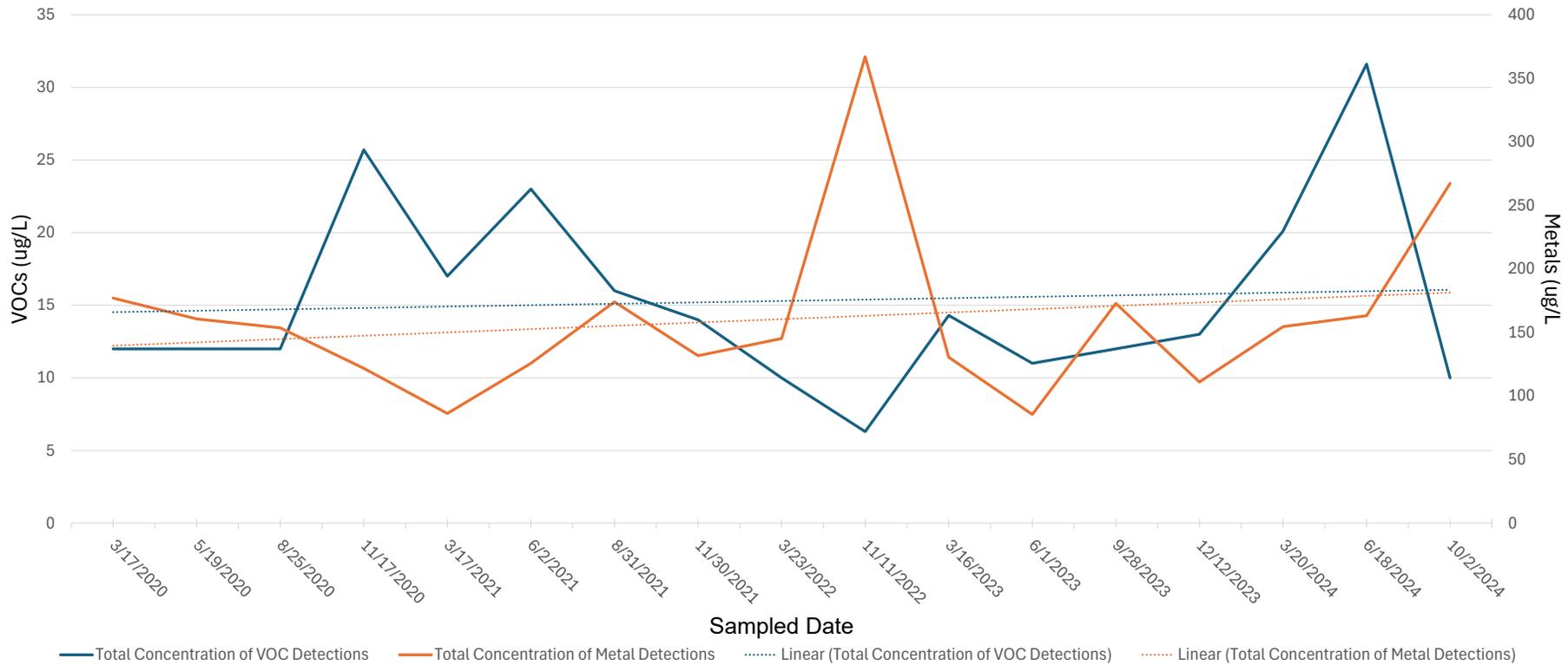
Total Metals Detections - MW-12



1. Exceedances of metals at MW-12 have demonstrated decreasing concentrations.
2. No SVOC, cyanide, or PCB exceedances have occurred at MW-12.
3. Metals exceedances at MW-12 are limited to one single lead exceedance during the first quarter 2020 sampling event and have not been recorded since.
4. VOC exceedances are limited to one single 1,2-Dichloroethane exceedance during the first quarter 2022 sampling event and have not been recorded since.

MW-12 is proposed for decommissioning.

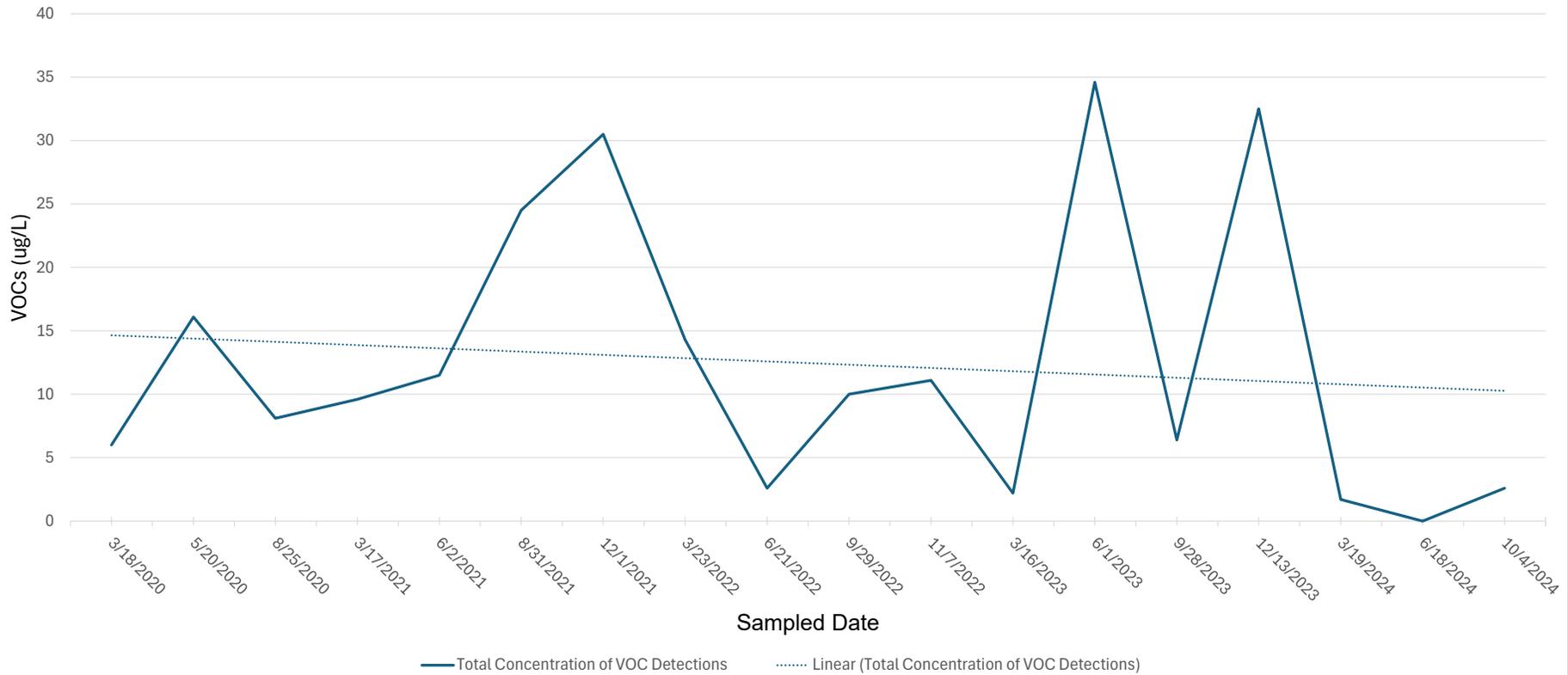
Total VOC/Metals Detections - MW-13



1. Exceedances of VOCs and metals at MW-13 have demonstrated generally static or decreasing concentrations.
2. No SVOC, cyanide, or PCB exceedances have occurred at MW-13.
3. VOC exceedances are limited to benzene and chlorobenzene.
4. Metals exceedances are limited to total and dissolved arsenic.

MW-13 is proposed for gauging and sampling once every five quarters.

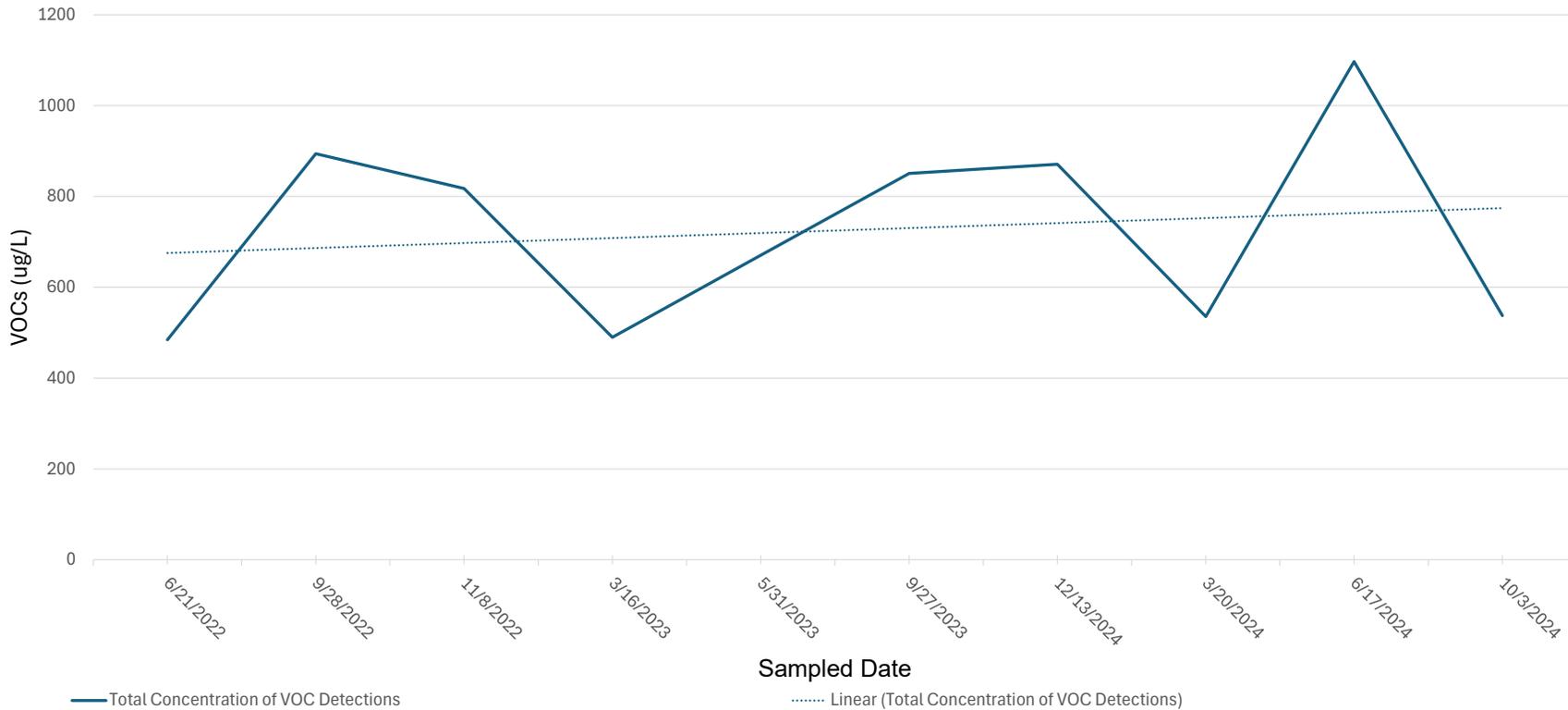
Total VOC Detections - MW-14



1. Exceedances of VOCs at MW-14 have demonstrated static or decreasing concentrations.
2. No SVOC, metals, or cyanide exceedances have occurred at MW-14.
3. VOC exceedances are limited to 1,3-dichlorobenzene, 1,4-dichlorobenzene, cis-1,2-dichloroethene, and chlorobenzene.
4. PCB exceedances are limited to one single detection of 0.62 ug/L.

MW-14 is proposed for gauging and sampling once every five quarters.

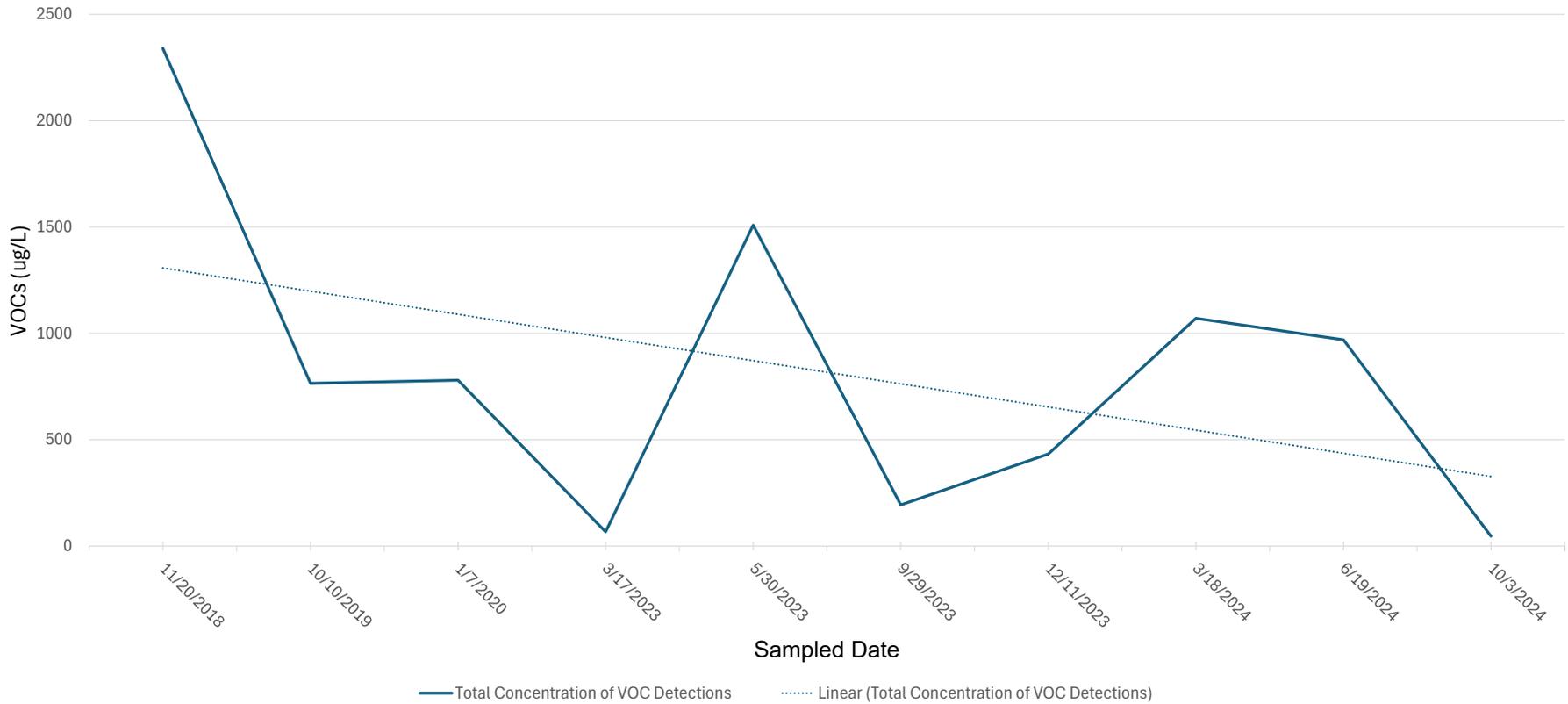
Total VOC Detections - MW-15



1. Exceedances of VOCs and metals at MW-15 have demonstrated generally static concentrations.
2. No metals, cyanide, or PCB exceedances have occurred at MW-15.
3. VOC exceedances at MW-15 are limited to 1,2-dichlorobenzene, 1,3-dichlorobenzene, 1,4-dichlorobenzene, benzene, and chlorobenzene.
4. SVOC exceedances at MW-15 are limited to naphthalene.

MW-15 is proposed for decommissioning.

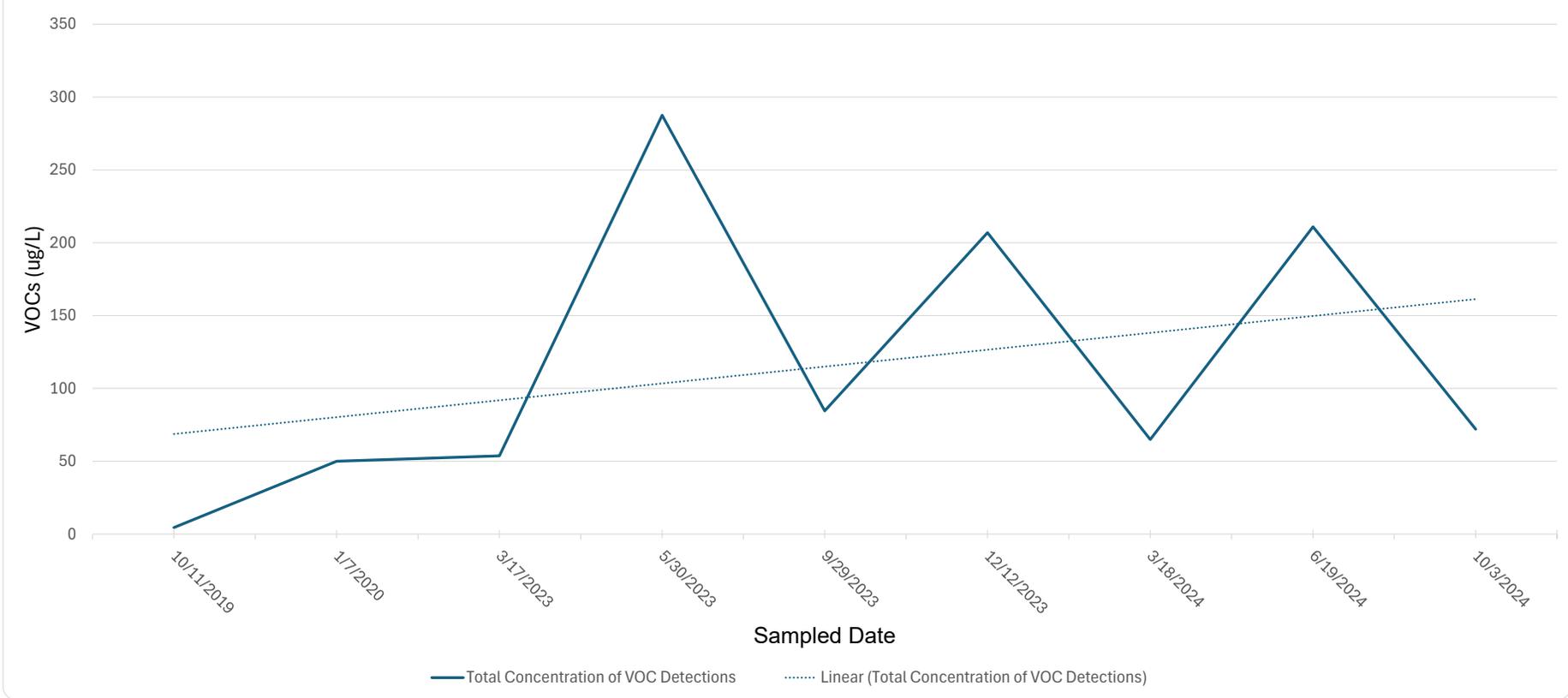
Total VOC Detections - MW-16/16R



1. Exceedances of VOCs at MW-16R have demonstrated decreasing concentrations.
2. No SVOC, metals, or cyanide exceedances have occurred at MW-16R.
3. VOC exceedances are limited to 1,3-dichlorobenzene, 1,4-dichlorobenzene, benzene, and chlorobenzene.
4. PCB exceedances have demonstrated generally static concentrations.

MW-16R is proposed for gauging and sampling once every five quarters.

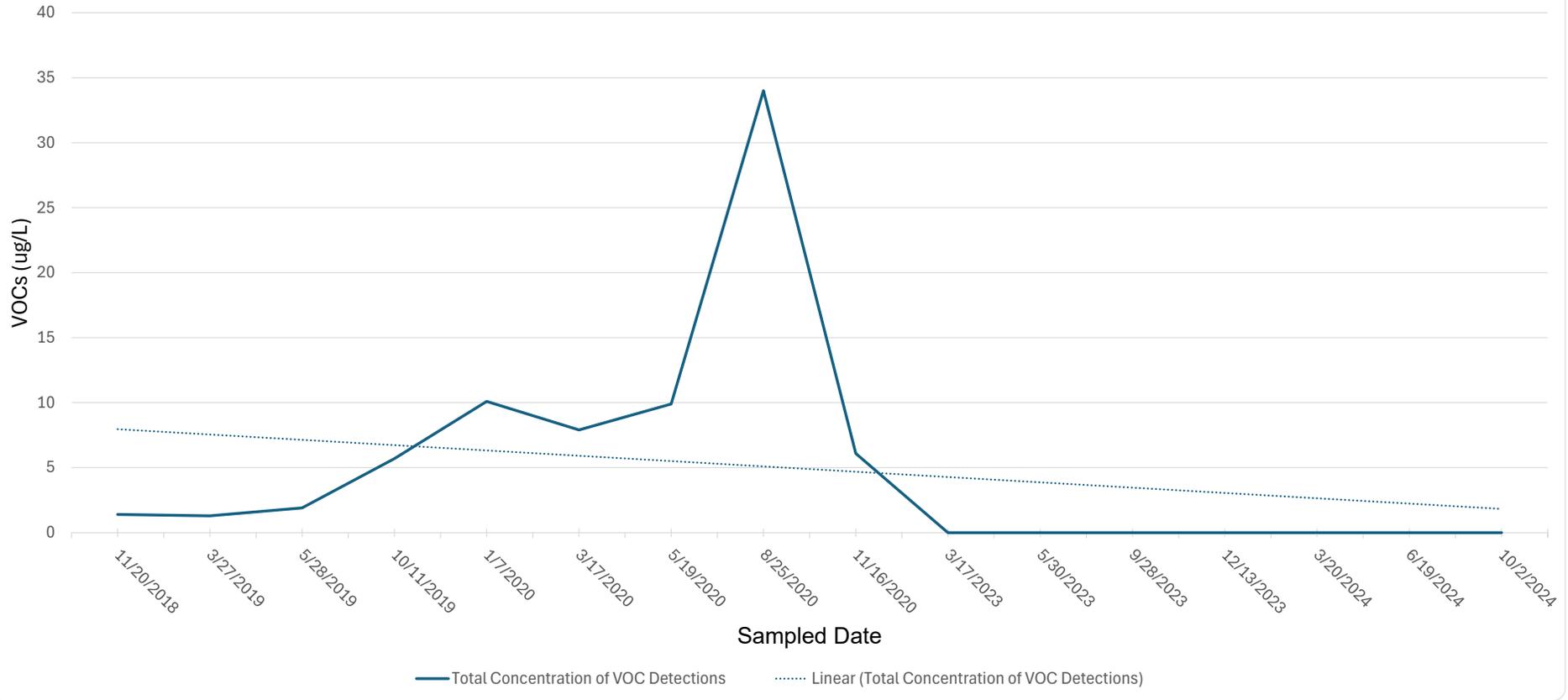
Total VOC Detections - MW-17/17R



1. Exceedances of VOCs at MW-17R have demonstrated decreasing concentrations.
2. No SVOC, or cyanide exceedances have occurred at MW-17R.
3. VOC exceedances are limited to 1,3-dichlorobenzene, 1,4-dichlorobenzene, benzene, and chlorobenzene.
4. Metals exceedances are limited to total lead and have not exceeded 28.4 ug/L.
5. PCB exceedances have demonstrated generally static or decreasing concentrations.

MW-17R is proposed for gauging and sampling once every five quarters.

Total VOC Detections - MW-18/18R



1. Exceedances of VOCs at MW-18R have demonstrated decreasing concentrations.
2. No SVOC, metals, cyanide, or PCB exceedances have occurred MW-18R.
3. VOC exceedances are limited to chlorobenzene and chloromethane.

MW-18R is proposed for decommissioning.