

Raymark Advisory Committee

Meeting Summary

13 April 2004

6:30 PM to 9:00 PM

Army Engine Plant

Members Attending: Michelina Buchino, Robert DelBuono, Tom Fahy, Edwin Fordham, Ron Mazzey, Robert Osborne, Veronica Peters, Paul Rohaly, Ron Smith, Ed Ward

Government/Agencies Attending: Elaine O'Keefe, Town of Stratford Health Department, Patrice Sulik, Health Risk Consultants, Inc.

Others Attending: Kevin Ryan, Attorney, Gavin Forrester, Town Council,

Facilitators and Technical Assistance: Patrick Field, CBI, David MacLean, GeoInsight, John Gilbert, GeoInsight

Members Absent: Jack Daley, John Goodsell, Charles Perez, Lew Knapp

Convening of Meeting, Groundrules, and Summary Review

The Raymark Advisory Committee (RAC) meeting was convened at 6:30 pm. The facilitator reviewed the agenda. The RAC reviewed and approved the March meeting summary with changes.

Agreements Reached

The RAC asked Geolnsight to meet with EPA to look for options to address OU-6 And and other affected properties and remaining open RI issues within the remaining, available funds.

Action Items from Meeting

The RAC and agencies identified the following action items in the meeting.

1. CBI to prepare RAC Update for Town Council
2. CBI to prepare update for RAC on budget
3. Geo to revise matrix on off-ramping of properties to include criteria for SRI participating properties and prioritizing residential and privately owned commercial properties

4. Agencies to prepare some form of response to comments on OU6 and share that with the RAC
5. EPA to prepare list of other sites that have either brake shoe manufacturers or fill that was distributed widely about tow
6. EPA to host meeting with property owners in OU6 end of April. RAC members Rohaly, Peters, Fordam, and Delbuono to participate and provide short presentation on RAC.
7. CBI send to and EPA will distribute the RAC Consensus Agreement at the OU6 property owners meeting.
8. CBI to ask state if MatCon was approved for use elsewhere in state.

OU6 Remedial Investigation Review

GeoInsight reviewed key issues on OU6.

- Agency will provide response to comments by end of next week. Final RI will be issued end of April. The final OU6 RI is a public document, but no specific public meeting or public comment period on it will be held.
- GeoInsight corrected an update email to the RAC noting that all 27 properties do not have “unacceptable” risk. Some properties have no quantifiable risk, particularly those with asbestos as the primary contaminant above 1%. GeoInsight did note that all 27 properties do need to be reviewed in a FS approach to consider what remedial action, if any, is required.
- EPA clarified the ownership of 3 properties in the RI and as it turns out, these 3 are on DOT, not private, property. The addresses include: 171-189 Ferry Blvd and 335 Ferry Blvd, and DOT Ferry Boulevard. Geo will clarify with EPA the address of the third.
- The residential property remains in OU6 and is an occupied home with no current occupants.
- Three properties are being assessed, in addition to the 27, following resolution of access issues. If they have Raymark waste on them, they will be included in the OU6 RI as an addendum. Negotiations continue with these owners, which include some 10 parcels.

The RAC discussed the upcoming EPA meeting with property owners on April 28 at 6 PM in the Birdseye Municipal Building and recommended the following:

- RAC members should attend, including Rohaly, Peters, Fordam, and Delbuono.
- They’ll present briefly about the RAC as part of the agenda, be available for questions, and offer that owners can attend RAC meetings and be on the email list if they wish.

- The RAC asked the EPA distribute the RAC Consensus Agreement to property owners.
- The RAC thought it was a bit quick to notify property owners of the meeting and more notice should be given in the future.

Off-Ramping Discussion

The RAC began a discussion of how some properties might be “off-ramped” from the CFS in order to do remediation and close out those properties quickly and efficiently. GeoInsight presented a table that described estimated Raymark waste area, volume, accessibility, risk, soil volume as manageable, capping potential, and totaled the scores of each criteria for a total score. GeoInsight’s initial cut at the problem identified that sites with relatively low volumes of waste, easy accessibility, and capping potential would be the most likely candidates for off ramping. The RAC noted the following points:

- Consider that private property owners should get priority over public ownership.
- Low costs should be a priority so we don’t use up all the Raymark monies on a few sites.
- Development potential ought to be a criteria, especially those that participated in the SRI. The RAC identified those properties in the table.
- Consolidation within the 27 properties might be appropriate as long as the budget was met.
- We have to consider the transaction costs of off ramping: time, resources, document preparation, etc.
- Water protection cannot be the primary driver for cleanup. Two miles up the river is the Shelton Landfill that continues to leach into the groundwater and the Housatonic. The OU1 site continues to leach into the same. The Housatonic sediments in general are likely highly contaminated. The RAC encouraged EPA and DEP to work through the issues regarding state RSRs as soon as possible.
- Another way to do the cleanup is to plan the entire scope around the budget you have. The RAC discussed this as an overriding organizing principle for the CFS and considered it an important option to explore. GeoInsight agreed to explore this idea with EPA.
- Can Brownfield’s money be used as part of the overall plan, by tapping into DOT, HUD, Economic Development Agency, and other federal Brownfield’s monies? It was noted that two limitations to Brownfield’s monies are that entities can’t own the property when it was contaminated (thus, many properties have to transfer ownership before work can begin) and most programs give money to municipalities, not property owners (thus, properties are often transferred to municipalities who then enter into partnerships with private developers).

- The RAC noted a planned US Army Corps dredging project on part of the Housatonic that might lend itself to synergies with sediment cleanup.

A RAC member presented another approach to how the cleanup might proceed. This option and others are presented below.

- Prioritized approach. OU6 would be prioritized, parcels within prioritized for action based on set of criteria. OU5 would receive whatever supplemental cap to obtain a long-term remedy. OU3 would be combined with OU2 and probably rendered technically impracticable. OUs7 and 8 would be remediated, if possible, as sediments, at some future date. OU4 would be available for redevelopment and Brownfields sought. If private monies were not obtained, any remaining monies would be spent to cap OU4. As necessary, some amount of money would be put in escrow for Town to address any future soil-gas work in individual homes. OU9 would be addressed via removal monies.
- Consolidate OU6 and OU5 and off-ramp all these properties from the CFS and build a program around the monies remaining. Issues to be dealt with are state RSRs, addressing questions of volume and uncertainty, obtaining DEP approval of use of MatCon, where needed, and concurrence on cost factors. This option might substantially expedite cleanup and spend money efficiently. The RAC did ask if DEP has approved MatCon use at other sites in CT.
- Don't off-ramp at all. Too complicated, potentially expensive and divisive, and not comprehensive.
- Very limited off ramping at low cost.
- Expedited, streamlined, strategic CFS that seeks to accomplish cleanup within the budget there is. Some OUs would probably be left for future monies – sediments, for example.

Other Updates

OU9

GeoInsight and the Health Department presented on initial findings on sampling in Short Beach Park. Some contamination was found at depths of 0 to 2 feet and deeper. Most of these deeper samples are being validated. However, only two samples indicated Raymark waste at the surface, and they are not an imminent health threat. Thus, it's not likely that major time-critical action will be needed at this site at this time. More data should be available by June.

Other

- GeoInsight has not received the OU2 RI yet, so expects it will not have comments for the RAC until mid-May or later.
- The RAC should expect a detailed CFS schedule in May or June.

Adjournment

The RAC adjourned its meeting at 9:00 PM. The next meeting is scheduled tentatively for May 11 pending sufficient progress to meet. In lieu of the meeting, the RAC would at least hold an update conference call.