

Raymark Advisory Committee

Meeting Summary

20 July 2004

6:30 PM to 8:30 PM

Army Engine Plant

Members Attending: Michelina Buchino, Barbara Clancy Draglin, Robert DelBuono, Tom Fahy, Edwin Fordham, Ron Mazzei, Robert Osborne, Charles Perez, Veronica Peters, Paul Rohaly, Ed Ward

Government/Agencies Attending: Elaine OKeefe, Town of Stratford Health Department, Andrea Boissevain, Health Risk Consultants, Ron Curran, DEP, Ron Jennings, Mike Jasinski, EPA

Others Attending: Allison Dodge, Congresswoman Delauro's Office, Lionel Dyson, Haliburton-Dresser, Len Wisniewski, Chris DeRoma, The Bard, Craig Lavazza, Congresswoman Delauro's Office, Fred Hyatt, Kevin Ryan

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

Members Absent: Jack Daley, Lew Knapp, Ron Smith,

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 June meeting summary with changes. .

Agreements Reached

- None at this meeting.

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 and GeoInsight to prepare update for RAC on budget for first 6 months of 04
3. EPA to prepare Response to Comments, including additional fate and transport modeling and risk analysis, revised charts/tables, for OU2 for RAC, DEP, GeoInsight, and Town, within 60 days.

5. EPA and DEP to address regulatory issues pertinent to off-ramping, including CT Pollutant Mobility Criteria (PMCs), ambiguities regarding risk evaluation by release area or property boundaries, and administrative process for effort.
6. CBI and GeoInsight to continue to talk with property owners and agencies regarding possible off ramping scenarios.
7. GeoInsight to review State's request in changes to RCRA standards in a federal register notice.
8. EPA will prepare an update of the funding status of the Special Account(s) and provide reports regularly as the off-ramping discussion proceeds.
9. DEP will look into home teardowns and implications for slab systems responsibilities.

OU2 (groundwater) Remedial Investigation Review

GeoInsight shared the discussion it had with EPA, DEP and the Town regarding the OU2 RI.

- The final document needs to be clear that all Raymark waste from sites other than OU2 (the primary source of groundwater contamination) is not necessarily a source of groundwater contamination. At this time, only one well from one OU6 property indicates it is contributing as well as OU1 to the groundwater impacts.
- Another risk scenario needs to be evaluated for commercial workers involving soil gas indoor air exposure.
- The computer fate and transport modeling for contaminant sources on the Morgan Francis property and possible impacts on Ferry Creek will be revised.
- The scenario for human health risk due to consumption of oysters is being removed from the document

Off-Ramping and Comprehensive Feasibility Study (CFS) Discussion

GeoInsight and CBI shared a draft process plan for undertaking an off ramping approach. EPA and DEP made the following comments.

- The agencies are working to develop strategies to comply with the Pollutant Mobility Criteria (PMCs) of the CT remediation standard regulations (RSRs) and are working site by site on how PMC compliance will affect choices for remediation.
- A remedial option for waste needs to prevent direct exposure, which most caps provide, such as the one on OU5 (the boat club), as well as prevent leachability that would create further groundwater contamination. A technology such as

MatCon might work to address both. The EPA and CTDEP have questions regarding Mat Con's warranty on performance, maintenance requirements and costs, and being beholden to a single provider of the technology. These issues must be reviewed further.

- The federal Superfund regulations allow very few waivers of ARARs such as the RSRs and ARARS are rarely if ever invoked. The CTDEP and EPA are exploring waivers and options available under the RSRs and these are very limited. Compliance strategies currently being discussed between the CTDEP and EPA involve full compliance with the RSRs.

The RAC made the following comments.

- Wetlands need to be included as abutters in the comprehensive off-ramping draft process map because some OU6 properties abut wetlands that may also be contaminated.
- Ownership of land versus wetland should be clarified. Each property deed is different because over time the State "took over" riparian areas and took ownership out of newer deeds/titles.
- In facilitator/technical advisor interviews with property owners, please add a question about how the current situation/status quo is affecting property owners.
- The application of PMCs must show some flexibility so that remediation within available financial resources can reasonably be completed.
- EPA should provide a monthly accounting of the Special Fund so we know how much money we have to work with.
- The State is seeking approval of new RCRA standards. A RAC member asked GeoInsight to review the Federal Register notice after CBI circulated it.
- Can priority be given to private property owners first? This seems essential since government properties aren't currently being prevented from their highest and best use or affecting individual's finances.
- If Geo/CBI are talking to private property owners, does this give them some kind of priority or preference in decision-making? RAC members and abutters do not want to be left out of being fully involved in finding and agreeing to a solution. CBI noted that Geo and CBI's job is to work to find an acceptable solution for all, not for one stakeholder over another. CBI and Geo have are also talking to public property owners such as the Town of Stratford.
- How are wetlands regulations going to affect this cleanup? If they are contaminated and degraded, do they have to be cleaned up and restored to wetlands, or could some kind of wetlands mitigation be put in place? DEP noted that when wetlands are considered for remediation a cost-benefit analysis of the remediation costs/impacts is weighed against the current and future benefit of the wetlands.

To Dos for moving forward include, for the agencies:

- DEP and EPA concurrence on what kinds of cap are acceptable and where. For instance, what kind of cap is appropriate if the waste is primarily asbestos versus higher concentrations of all Raymark constituents?
- Will risks be calculated and regulated by parcel/property or by release area?
- What are allowable PMC's and regulatory strategies, if any, for waivers, variances other regulatory mechanisms?
- What type of administrative process (Interim ROD, non-time critical action, other) would be most appropriate for capturing the plan and formalizing it efficiently?
- There needs to be a communications and outreach plan. How are we going to get people's attention? RAC members reviewed a draft letter that could be sent to OU6 property owners.
- We have to understand consolidation possibilities in regard to OU4, 5, 6 property owners, abutters, regulations, zoning, and costs.
- Can OU9 work, if needed, be done via removal monies and not from the Raymark dedicated account?

For GeoInsight and CBI:

- What properties represent potential consolidation locations? It is imperative for these property owners to participate in the process.
- What are the interests of the Town?
- What are the technical choices for the property owners?

Other Updates

Other RIs

It was noted that RIs for OUs 3, 4, 6, 7, and 8 are now complete. OU2 should be done in the fall and a draft OU9 (Short Beach Park) should be out in October.

SubSlab Depressurization Systems

A RAC member asked who is responsible and how if a home purchased is either substantially remodeled or torn down and a new one rebuilt. Is the homeowner responsible for installing a new system? Is DEP? DEP noted this and stated they would look into the matter.

OU9

The Town Health Department had noted in June that some 475 samples were taken at depth 0 to 2 feet. For samples with hits of Raymark waste (12 samples only), surface samples were then taken and only 2 were found at surface with Raymark waste. These

are in remoter areas. The Town will provide some additional cover to the area. . DPH had prepared a draft health consult that was forwarded to the RAC after the June meeting. Data is now being analyzed at depth and the draft RI expected in October.

Adjournment

The RAC adjourned its meeting at 8:30 PM. The next RAC meeting will be Tuesday, September 14.