

Raymark Advisory Committee

Meeting Summary

8 June 2004

6:30 PM to 8:30 PM

Army Engine Plant

Members Attending: Michelina Buchino, Robert DelBuono, Edwin Fordham, John Goodsell, Ron Mazzeo, Robert Osborne, Veronica Peters, Paul Rohaly, Ed Ward

Government/Agencies Attending: Elaine O'Keefe, Town of Stratford Health Department, Andrea Boissevain, Health Risk Consultants, Inc., Ron Curran, DEP, Ron Jennings, Mike Jasinski, Jim Murphy, EPA

Others Attending: Gavin Forrester, Town Council, Jonathan Perkins, Perkins and Associates, Lionel Dyson, Haliburton, Len Wisniewski, Chris DeRoma, The Bard

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

Members Absent: Jack Daley, Charles Perez, Lew Knapp, Tom Fahy, 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 April meeting summary with changes. EPA asked for clarification from the May conference call notes regarding if there was any remaining confusion regarding which properties were in and out of Superfund. The RAC noted that they were now clear which properties were in and which were out via the OU6 RI.

Agreements Reached

- The RAC reviewed GeoInsight's comments on the OU2 and agreed to have them forwarded to EPA.

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. Geo, EPA, DEP to meet to resolve comments on OU2 RI.

4. Agencies to prepare some form of response to comments on OU2 and share that with the RAC
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 develop more detailed, structured process for off-ramping, addressing issues/ideas raised by the RAC and seeking input/views of Town on this approach.

OU2 (groundwater) Remedial Investigation Review

GeoInsight shared its comments on the OU2 RI with the RAC. The major comments included:

- The maps are unclear in some cases and need to be revised. For instance, many of the contaminant plume cross-sections do not appear to be consistent with associated area maps of the plume
- The RI is confusing in that it states that groundwater contamination is deep but also that contaminated GW recharges to Ferry Creek. This needs to be explained more clearly.
- Is it assumed that all RW is leachable using Morgan Francis as the only example. On what basis?
- The document should be clear about ruling out the presence of private wells. The Town and EPA noted that several different efforts have been made to ensure that no private wells are in the study area and currently being used.
- Soil gas data and work needs to be integrated more clearly into document.
- Need further discussion of fate and transport models. Models are relatively simple for the complex data incorporated into them and the complex local hydrogeology.

The next steps will include a technical meeting among the agencies and GeoInsight to resolve comments, followed by a written response to comments document prepared by EPA and distributed to all.

Off-Ramping and Comprehensive Feasibility Study (CFS) Discussion

GeoInsight reported on its meeting with EPA and DEP regarding the way forward on the comprehensive feasibility study. GeoInsight and the agencies, taking up the suggestions of the RAC, outlined a general approach to a “comprehensive” off-ramping approach.

- OUs 2, 3, 7 and 8 would not be included in the comprehensive off-ramping approach, except for the potential removal of “hot spots.”
- OU 2 was primarily addressed by the installation of sub-slab depressurization units (SSDs); monitoring of the systems will be the responsibility of the CTDEP and comprehensive ground water clean-up will not be considered in the off-ramping approach.
- OUs 4, 5 and 6 would be reviewed in detail, seeking to find a package cleanup proposal that gets as much work done as possible with the RAC dedicated account monies, meets the interests of the Town, the RAC, property owners, and the agencies.
- Technologies would need to be simple, acceptable, and as inexpensive as possible.
- OU9 is in the RI process, but may need to be accounted for in this planning in some way.
- This approach would be different than the usual EPA Superfund FS process and would be built from the “ground up” with all the stakeholders, rather than “for” the stakeholders.

Tools that can be used to help develop this plan include:

- The RAC
- SRI information/report
- Confidential interviews with property owners
- Small meetings with a few contiguous property owners
- Other

The RAC raised the following issues and concerns:

- Who will ultimately decide the way forward? The facilitator noted that EPA is the final, formal decision maker. However, all stressed that it was essential, if possible, to build an agreement that all or most can live with because “imposing” an approach and creating a lack of cooperation from significant numbers of private property owners would be highly contentious and inefficient.
- Who decides for the Town? It was noted that the RAC would forward its recommendations to Town Council and Town Council could comment, as could individuals, during any formal comment period.
- A property owner noted: the interests of property owners are simple -- get it done as quickly and cheaply as possible and let them move on.
- What does getting “out” of Superfund mean? There still may be limitations and deed restrictions on properties and O&M costs, especially if a parcel is capped. This has to be made clear to owners.
- What if one or more owners refuse to cooperate? It was noted that isolated parcels might not affect an overall package. It was also noted that this would leave

uncertainty about what additional waste must be consolidated. It was also noted that parcels would still be encumbered by Superfund and would have to be cleaned up at some point. If a refusal happens, it raises the following questions. What will the “cooperators” developing the plan do? What happens to the property owner? What say, if any, do abutters to the refusing property owner have in the decision?

- What is the perception of GeoInsight and CBI? The RAC noted that trust in the “honest brokers” would be essential and the RAC would likely have to help with this via first contacts, letters, meetings, etc.
- One member noted that this is the best chance of us solving the problem. Let’s not get too caught up in potential problems, but focus on how to use a good process to solve the problem.
- The RAC has lots of knowledge about Superfund due to its hard efforts, but property owners need clear and basic facts and choices. There’s no point going to them until you can ensure and convince them this is the time when action will really happen.
- Isn’t this approach opening a Pandora’s box? What if we have money for some properties’ cleanup, but not others? What will be the decision criteria for choosing among properties, if we have to? Human health risk? Active owner participation and cooperation? Technical viability? Cost? Redevelopment potential? Closure/certainty brought by action? Neighborhood impact?
- Are there any connections/links here for Brownfields monies or other development monies? It was noted that typically developers want a ROD in place by the EPA before beginning to consider development financing and action. A RAC member noted that these kinds of developers often seek a premium in terms of equity/investment due to higher risks of cleaning up and redeveloping these kinds off properties.

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 process, if any, for waivers or 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 is a history and a significant impact to property values that has to be kept in mind.
- There needs to be a communications and outreach plan to go with this all. How are we going to get people’s attention?

- 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:

- How will property owners be included in the process to determine what they think about consolidation, capping, and removal?
- 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

Operable Unit 6 Update

EPA reported that the property owner's meeting in April went well, though attendance was small. The RAC presented as well and asked owners to participate in the RAC to keep informed. EPA noted that of the three remaining owners where access was being sought, access was granted by 2 owners. The properties were sampled and no Raymark waste was found.

Subslab Depressurization Systems Installation

DEP reported that 94 systems have been installed. 3 are awaiting final approval. 112 offers were made to install systems. A RAC member noted that one property owner had great difficulty selling their house after the system was installed and could not get information regard monitoring. The final selling price was some 20 to 30% lower than listed. DEP noted that access to his property for monitoring was refused. EPA noted that installation was offered within a broad area, but that each home was not tested.

OU9

The Town Health Department noted 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 but the Town will provide a temporary cover over the areas. DPH has prepared a draft health consult that will be available in a month or two. An RI is now underway that should be in draft form by August.

Other

- EPA and GeoInsight will explore MatCon issues.

- CBI owes an updated budget to the RAC and agencies.
- The July meeting will be held on July 20.

Adjournment

The RAC adjourned its meeting at 8:35 PM.