

Raymark Advisory Committee

Meeting Summary

9 March 2004

6:30 PM to 9:00 PM

Army Engine Plant

Members Attending: Michelina Buchino, Robert DelBuono, Tom Fahey, Edwin Fordham, Lewis Knapp, Ron Mazzey, Robert Osborne, Veronica Peters, Charles Perez, Paul Rohaly, Ron Smith, Ed Ward

Government/Agencies Attending: Andrea Boissevain, Health Risk Consultants, Inc.; Elaine OKeefe, Town of Stratford Health Department, Patrice Sulik, Health Risk Consultants, Inc. Mike Feeney, Town of Stratford, Ron Jennings, US EPA, Mike Jasinski, US EPA, Jim Murphy, US EPA, Mike Cook, US EPA, James Kanz, US EPA, Ron Curran, CT DEP

Others Attending: Kevin Ryan, Attorney, Erika Swanson and Jeff Bombard, Congresswoman DeLauro's Office, Kathleen Conway

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

Members Absent: Jack Daley, John Goodsell,

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 approve the February meeting summary

Agreements Reached

The RAC recommends that the U.S. EPA move forward with the letters to property owners who were sampled as part of the OU6 sampling effort and initiate outreach activities to the property owners in OU6.

Action Items from Meeting

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

1. Review DEP's information on soil gas work, including costs, and share with the RAC
2. CBI to prepare RAC Update for Town Council

3. CBI to prepare update for RAC on budget
4. Geo and CBI to work to develop draft framework to guide RAC discussion on off-ramping of properties
5. Agencies to meet on March 18 to discuss all RIs, including OU6 comments
6. Agencies to prepare some form of response to comments on OU6 and share that with the RAC
7. EPA to prepare list of other sites that have either brake shoe manufacturers or fill that was distributed widely about town
8. EPA to send out finalized OU6 sampling result letters

OU6 Remedial Investigation Review

GeoInsight raised the following comments on the draft OU6 RI. The Town Health Department and DEP also made points included below.

- All agree the document should be completed using existing data as quickly as possible in order to move forward to the CFS. Data gaps can be filled during final design.
- The document makes it difficult to tell where risk is and is not. Which properties have significant risk? Do any not have significant risk? How many have so much uncertainty that risk cannot be determined at this time?
- OU2 needs to be more explicitly mentioned in the RI, along with other related OUs such as OU3 and note the potential of recontamination via groundwater. The OU6 RI needs to be placed in context to the overall site. The assumption is that if you have Raymark waste on a property, it is the primary source of groundwater contamination. But, the reality is that the groundwater is already significantly contaminated by OU1 upgradient.
- The document appears to indicate that other properties could be added at any time if sampling is gathered. This should be clarified. Isn't the intent to complete this document soon?
- Why does OU6 include a residential property, when confidentiality and a distinction between commercial and residential properties were always made in the past?
- The risk calculations using a fraction of each property with Raymark waste, as a multiplier for exposure times seems unusual. The risk receptors chosen do not necessarily reflect future land uses.
- The way risk is done appears to attenuate the risks that are possible.
- EPA has drawn boundaries between waste and no waste areas that do not seem supportable by the data. For instance, Raymark waste is determined via sampling from surface to 4 to 6 feet below then a "clean" area is defined by sampling done only at 6".

- Property boundaries are used as a delineation boundary for risk calculations when the area of waste, not property boundaries, should be used.

The RAC asked the following questions:

How many more properties will potentially be included in OU6? *EPA noted that there are a few remaining properties where access has not been granted. If access and sampling is completed in a timely fashion, an addendum to the RI can account for these additions. However, these remaining properties will not hold up the completion of the RI. In order to address if future properties are found with Raymark waste, the Town, in conjunction with the Stratford Health Department, is working to develop a local institutional control system*

- Could the table with properties and risk be ordered in terms of greatest to least risk? Can the percentage of Raymark waste constituents be noted by percentage?

EPA presented a risk summary table (Tabel 4-1 from the draft RI) and sought to explain the risk calculations. They noted the following:

- EPA's acceptable risk range in which they may make a risk management decision about if and how to proceed is $10(-4)$ to $10(-6)$.
- CT's acceptable risk range is $10(-6)$ for any individual compound and $10(-5)$ for multiple compounds
- Asbestos is considered problematic above 1%, but this is not a risk-based number.
- Lead is considered a health risk if more than 5% of individuals have blood lead levels above 10 ug/dl. .
- A hazard index greater than 1 indicates an acute and/or longer-term non-cancer health impact.
- Once the site is defined as having Raymark waste, any contaminant within the Raymark waste footprint on that property must be considered in the risk assessment.
- The table with the properties, then, has to be read with care. Each property has information regarding asbestos, lead, various other compounds that may lead to either a cancer or non-cancer risk. So, a property may have asbestos content of 10% or more, a lead level of above 5%, but have not cancer or non-cancer risk due to other contaminants.
- Each of the OU6 properties has unacceptable risk due to exposures summarized in the table.
- The exposure calculation was done as follows: the percentage of the property with Raymark waste multiplied times the time the individual would spend on the property followed by the rest of the calculation.

Next steps for finalizing the OU6 RI will be:

- Agencies and GeoInsight meet on March 18 to discuss this and other RIs.
- Responses will be prepared to provide responses back to all.
- RI will be finalized then in April.
- A meeting with property owners will be held to share the results

Presentation and Questions on the Superfund Program

Michael Cook, lead of the national Superfund program from Washington, D.C. presented information on the Superfund program nationally and answered questions. Key points are included below.

General Overview

- The Superfund was well-funded until about five years ago. In the early years of the program, most work was investigation and site characterization.
- Currently, the program has about 700 construction activities at 400 sites
- In 2000, two sites could not be funded to start new remedial work. In 2001, there were two additional sites that could not be funded. Now, this number of sites where work cannot be funded is growing rapidly.
- To manage this restriction of funds, EPA has deferred new listings of NPL sites where risks are relatively low, prioritized on-going construction for funding, scrubbed and sought construction budgets and sought to be as efficient as possible, and developed criteria for prioritizing work.
- New starts are funded only after on-going construction sites, typically these days, out of “end of year” remaining funds from elsewhere in EPA. An on-going site is one where “yellow equipment” is on site and working. Thus, Raymark would be a new start. New starts can be at sites where work once took place, but has been completed and demobilized. On-going construction is funded first in order to avoid costs of demobilization and remobilization.
- This year, remediation at ten sites is taking 50% of the Superfund monies. This means, after all on-going construction is tended to we have only \$28 million for new starts and whatever else we can find in year-end monies. Thus, cost effectiveness is becoming more and more paramount at every single site we fund.

Prioritizing Funding of Sites

- **Human Health Risk.** EPA looks at the sites with the greatest human health impacts and risk. They consider the direct impacts, size of population, and toxicity of the contaminants. For instance, sites with high lead soil levels, direct exposures routes to children, and elevated blood lead levels in children, require immediate attention since it is known high blood levels have clear, verified, and serious developmental impacts.
- **Stability.** How stable is the contamination? Is it staying in place or moving and threatening health. For instance, a groundwater plume might not be currently affecting a drinking water supply, but is moving rapidly and will sometime in the near future. This kind of site would require action as soon as possible.
- **Characteristics of Contamination.** The concentrations and toxicity of the contaminants of concern are carefully considered in funding decisions. What are they and how toxic are they?
- **Other.** Other considerations are made, but they are of less priority. They include: possible use and testing of innovative technologies, the costs of delay and efficiencies of

current action versus later action, and possible consolidation of activities with other projects that may be operating nearby.

Current and Future Superfund Funding and Implications for this Site

- It is expected that Superfund will have limited budgets to work with for the foreseeable future. Congress did provide a \$28 million increase this fiscal year from a \$150 million request and EPA has requested another \$150 million increase for FY05. The equation is simple: more money, faster clean up – less money, slower clean up.
- There still remain key unknowns at this site to determine where it fits in relation to other sites needs across the country. The remedial actions and their costs have not been determined yet. We will all know a lot more when the ROD is completed sometime in 2005. It may be that Short Beach Park will require immediate attention due to risk, but that is yet to be determined. We at EPA Headquarters are very sympathetic to how long you all have been working on this site and bearing the impacts of the contamination and Superfund. We're also cognizant that there are 100s of sites in a similar situation.
- EPA is highly supportive of beneficial reuse and encourages it whenever possible.

The following questions and comments were made.

- The federal government has a long track record of helping its citizens manage risk. FHA loans and home purchases to FEMA flood funds are examples. Can't the federal government assist us in managing the financial risk and impacts caused by Superfund? Please help us develop a private-public partnership to help all out. *EPA noted that brownfields redevelopment is happening. One site went to local banks once a cleanup plan was in place and convinced them that thereafter, those affected properties could be worth the loan risk. But, this seems to be very rare.*
- Aren't there other sites like ours with brake shoe manufacturers we can at least network with? *EPA noted they would review sites with brake manufactures and sites where waste was distributed across a town or city like in Stratford.*
- We did have the SRI plan developed that has been incorporated into the Town's master plan. Would this help leverage Superfund monies, that we have a redevelopment plan in place? Also, we did through the SRI process look at private developers. The downside is they manage their risk by taking over full control of properties. *EPA noted that developers do assume some risk sometimes, even in helping fund cleanup, but only if typically a ROD and clear way forward is in place, they assume strong control, and they believe the property has significant development potential.*
- Two comments of caution. Let's not be pressured to do something now. OUI is an example that haste can make waste. Second, Eckland should be pursued for cost recovery. The question is: where can waste be moved around? *EPA noted that it might be most cost effective to cap in place wherever possible and/or to strengthen the stability of waste in place. In some cases, it may make sense to move and consolidate smaller quantities or where a cap may be difficult to maintain. In these choices, EPA will have to balance community needs with cost effectiveness.*
- The Raymark site is an orphan site funded fully by the federal government. Any new remediation will be a "new start." The chances of us getting money beyond the special accounts seems very unlikely. If we don't take care of local owners with the money we have, they will be left in limbo for years and years to come given the situation. *The site*

does have uncertainty right now that need so to be reduced. The two we are aware of are: 1) what is the risk and needs at Short Beach Park (OU9) and what remedial options do we have for the other OUs. One thought is: play out two more "extreme" scenarios. The most expensive might be pumping and treating the groundwater, major waste removal at Short Beach Park, and major waste removal at the other OUs. The least expensive scenario might be no to little more groundwater work, a minor amount of waste removed from Short Beach Park and other OUs and capping in place of most waste.

- *Is off-ramping possible? Yes, selecting sites where action can occur now, possibly under the removal program, is possible. Whether the Region will allow you to use Removal monies or will dip into the special accounts is the Region's decision.*
- *What policies or other actions can EPA take to help sites like ours given this predicament? The agency has been thinking about this problem. For instance you might go to local banks once a remediation plan is in place and seek moderate financing options for businesses is risk is low and a plan is place though action is not yet funded. One community did get its town to assess their contaminated properties at 0 for tax purposes, but then the real estate market took off and these folks unintentionally harmed their own property values by the action. We are highly unlikely to delist sites, though the risk may be low in comparison to others, because we would not be doing out duty to cleanup the environment and protect public health over the long term.*

Other Updates

Subslab Depressurization Installation

DEP noted that 13 homes are still to be completed. Work on all but two has started. Two actions are at the owners request for installation in May. There are 98 yes, 11 signed no, 3 verbal no's for a total of 112 homes that were approached. Work will be completed late in March, except for the two locations requesting May installation.

OU5 Leachability

GeoInsight noted that EPA has decided to not collect additional SPLP samples on OU5 to determine leachability. EPA noted that they believe that there is a 50-50 chance the soils will be found leachable, and since any one sample "failing" the test will implicate the entire OU, they do not believe it is worth the expenditure of \$20,000. EPA did note that this raises the larger issue of state RSRs and they intend to hold a meeting with the State soon to discuss this policy matter. GeoInsight noted a quick statistical test of Raymark data does not indicate a correlation between concentrations of lead and leachability. A high lead level sample may not be leachable and low lead level sample may be. A RAC member expressed concern about this approach and the possibility an assumption about leachability would drive the remedial decision but refrained from further comment at this time.

Other

The OU9 data will be available in the April/May time frame.

EPA asked the RAC to consider how they would approach “off ramping” of properties to quicker action. The RAC agreed to hold a meeting in April among its members and the Town to discuss this. GeoInsight and CBI will provide materials to help that discussion, such as a revised risk table as requested and indication of SRI properties within OU6.

Adjournment

The RAC adjourned its meeting at 9:15 PM. The next meeting is scheduled for April 13, 2004.