

**Raymark Advisory Committee**  
**DRAFT Meeting Summary**  
May 10, 2005  
6:30 PM to 8:45 PM  
Birdseye Complex Conference Room

**Members Attending:** Michelina Buchino, Robert Connolly, Barbara Clancy Draglin, Bob DelBuono, Edwin Fordham, Ron Mazzey, Charles Perez, Veronica Peters, Paul Rohaly, Ed Ward

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

**Others Attending:** Kurt Sendlein, Skirsky Airport, Allison Dodge, Congresswoman DeLauro's Office, John Turberville, Dresser, Mike Gross, Maco Law firm, RichWeizel, Reporter, Fred Misanthus, Stratford Star

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

**Convening of Meeting, Groundrules, and Summary Review**

The RAC convened at 6:40 PM. The February meeting summary was approved.

**Agreements Reached**

The RAC would not be able to proceed past the detailed analysis of a final set of 5 to 6 alternatives without answers to their many liability and cost questions detailed in their recent submittals to the agency.

**Review of Action Items**

Action items include.


- Congresswoman DeLauro's office to invite other Congressional Staff to June RAC meeting.
- RAC members to prepare letter to Town on hiring attorney/environmental specialist.
- EPA and state will determine who currently has control of the RCRA program in CT.
- Geo and EPA to provide more information on active treatment technologies.
- GeoInsight to review cost assumptions/estimates in detail.
- EPA to consider what part of OU9 landfill cap closure cost would be the increment required to satisfy Superfund requirements above and beyond the standard landfill closure that is the responsibility of the Town.

- Geo and review excavation depth assumptions and varying assumption's impacts on overall volumes for removal/consolidation/treatment.
- State to consider what share of cost it might bear due to ownership of Ferry Creek, in part.

## **EPA Update on Screening of FS Alternatives**

EPA presented on the status of its development and screening of FS alternatives to date. EPA noted that the initial screening involves a review on the CERCLA primary criteria as developed in regulation: effectiveness, implementability and cost. EPA noted that this is only the development and screening of alternatives phase of the feasibility study. Refined analysis will occur on a smaller number, to be followed by formal public comment and decisionmaking. EPA noted that costs are estimates only; the margin of error is assumed to be 50% higher or 30% lower. EPA noted that volumes might vary from Geo/RAC estimates due to the role of OU9, the “fluff” factor when materials are removed then redeposited.

EPA reviewed the current alternatives:

- *No Action*: as required by law.
- *Alt 2*: includes capping all OU6, OU5, and OU9 properties, and assumes that properties may need excavation before cap with clean material of up to 2.5 feet, especially for properties who need to remain at the current grade. 
- *Alt 3*: another RAC alternative for removal of all waste out of town. 183,000 yards estimated to be removed to below watertable with some capping for major waste properties. No consolidation in town.
- *Alt 4A - D*: Selective excavation and consolidation, but actions vary with number of excavated properties due to volume or logistical constraints. Costs for capital low as compared to others. Square footage of capping tends to stay somewhat the same.
  - *Alt 4A*: 14 properties excavation, three consolidation sites: OU4, landfill, and Ferry Creek culverted after consolidated waste there. 35K to OU4 and Landfill each, and 20K to Ferry Creek. Uses height restrictions for airport requirements. Leaves Ferry Boulevard with smaller properties that abut the Creek with waste in place along with Ferry Creek consolidation.
  - *Alt 4B*: essentially the “fair share” RAC alternative.
  - *Alt 4C*: capping and consolidating everything at OU4 – 106,000 cubic yards. 16 properties excavated. Some other large properties with waste left in place.
  - *Alt 4D*: look at OU4 and Stratford landfill as sole consolidation sites. 24 properties would be excavated. Total consolidation volume would be 121,000 cubic yards.
- *Alt 5A – E*: This alternative includes selective excavation, out of town disposal, and capping. Costs of out of town disposal expensive. Assumed 10% of all volume must be

treated to comply with RCRA regulations for most hazardous materials. The rest would go into hazardous waste landfill.

- Alt 5A – look at low volumes of 1,000 cubic yards or less per property. 78,000 cubic yards of waste would be moved out of town.
  - Alt 5B - 5,000 threshold.
  - Alt 5C – no particular threshold, but consider volumes and logistics for removal to identify 15 properties for removal. Primarily Alt 5B plus the Beacon Point Area. This alternative was intended to be comparable to Alternative 4A.
  - Alt 5D – 8,000 CY threshold involves excavation of 18 properties.
  - Alt 5E – 10,000 CY thresholds involves 21 properties and 117,000 cubic yards of waste for removal out of town.
- *Alt 6* – it is like 5C except rather than removal out of town the waste would be treated with a process in town via a thermal treatment unit and solidification for metals, then returned as fill to properties. About 100,000 cubic yards would require treatment.

EPA noted the definition of a term used in the screening. CAMU is a Corrective Action Management Unit under RCRA regulations. It is a rule that EPA can use for moving waste within a Superfund site and also allows EPA to meet land use disposal restrictions. Requires some treatment for particularly hazardous constituents -- on this site, we only have such waste on some properties. The RCRA rule generally states that waste should only be moved to a contiguous property. For Superfund, the CAMU is believed to allow disposal sites to be within Superfund site, but not contiguous in terms of property ownership.

## **RAC Response to Screening of Alternatives**

The RAC raised the following questions and comments.

- *What's the seasonal high water table?* This is the highest seasonal level observed over a year. This is what would be seen in a monitoring well. It's not tidal, but groundwater levels.
- *What authority does the Committee have?* Our role has been to digest "reguspeak" and to communicate to constituents and us. We've given lots of input and suggestions have been heard, though we have not necessarily affected policy. You know what we don't like and know that you will still forward for review things we don't like.
- *Can we influence and add or return to alternatives we screened out if we find something in analysis in detail?* Yes.
- *Why is the cost of capping all in place so high?* GeoInsight noted that OU9 capping was not considered in Geo's review unless it was going to be a consolidation site. Two, Geo included low permeability asphalt as the cap of choice. The agencies assumed a RCRA cap with 2.5 feet of clean soil above an extensive and expensive geoliner. Geo stated that they estimate such RCRA caps would be more expensive than low-permeability asphalt. The agencies noted that they did not specify, at this time, what kind of cap, and kept the cap technology the same for comparison.

- *On OU9, are there monies to close up this as a landfill separate from remaining special account funds?* The State ordered the landfill to be closed in the 1980's (1983). It is assumed for OU9 Superfund would only pay the portion directly attributable to Superfund and the Town would have to fund the remainder.
- *Are you going to test the current fill before you excavate? On my property, we have already added two feet of clean fill to address the waste, site grades, and so forth. It would not make sense to add yet another 2 feet of clean fill.*
- *There are lots of other actions that need to be kept in mind. A concession stand is going in on Short Beach Park. The proposed Exit 33 off of I-95 would disturb some waste. And, there's a big settling pond in the Orchard area proposed.*
- *Why is OU9 given such prominence when the RAC and the Town explicitly said this was far less a priority if there was no imminent human health risk, which there is not?*  
GeoInsight stated that OU9 was only considered in their initial analysis if it might serve as a consolidation site. The focus was to be on OU4 and OU6. EPA noted that since hazardous waste is present, especially in the landfill side of OU9 (most of Short Beach Park except a very few areas is adequately protected), it must be tended to as well. The intent would be to ensure Superfund only paid for its share of the total landfill closure. EPA noted that they heard and share the priority for OU6 cleanup and that, in particular, this prioritization can be addressed in phasing the overall project.
- *We want more information about the Alt 6 treatment technology. What are the costs, impacts of operation, space/land use needed for operations, is the treatment permanent?*  
GeoInsight noted that there are not many alternatives for Raymark waste given its composition. Thermal desorption and solidification are the likely candidates.
- *Is treatment on site? Are you building an incinerator with a big smoke stack? The extent could have serious political consequences.* The size of the unit depends on what you are trying to accomplish, but generally they are small to medium size and "mobile."
- *Say more about the new EPA Alt. 4A involving Ferry Creek.* EPA noted that the idea would be to culvert the Creek from Ferry Boulevard down somewhat. This has been done in Massachusetts. They "encapsulated" the Neponset River with a culvert and then capped over it. EPA does not envision a culvert all the way down to the mouth of the creek. The idea would be to consolidate up to maybe 20,000 cubic yards of waste on top of the culvert, then cap it. This would provide additional consolidation volume and close with greater certainty the properties abutting Ferry Creek. This may involve some kinds of wetlands mitigation. We would still have to address the remainder of OU3-Ferry Creek at a later date.
- *How might this approach affect recharge issue?* GeoInsight noted that the culvert would effectively cap impacted sediment, limiting the effects of recharge to the Creek.

## **Next Steps for Screening of Alternatives**

EPA noted that the next step would be to take these 13 alternatives and carry 5 or 6 forward to detailed analysis, considering such criteria as overall protection of human health and environment, and ARARs. EPA is also required to look at balancing criteria such as long term protectiveness, short-term effectiveness, community and state acceptance. The RAC and EPA laid out the following tentative schedule.

May 05	Agencies present alternatives to the RAC
June 05	RAC reviews and prioritizes alternatives
July 05	RAC and agencies narrow 13 alternatives to 5 or so for detailed review
August 05	Agencies analyze 5 or so alternatives, including liability issues
Fall 05	RAC and agencies carry on detailed, on-going dialogue on progress

The RAC identified several action items for proceeding.

- GeoInsight to review cost assumptions/estimates in detail.
- Geo and EPA to provide more information on Alt 6
- EPA to consider what share of OU9 landfill cap closure would fall under Superfund.
- Geo and review excavation depth assumptions and varying assumption's impacts on overall volumes for removal/consolidation/treatment.
- State to consider what share of cost might be born due to ownership of Ferry Creek, in part.
- Geo to continue to consider low-permeability asphalt as a viable alternative.

The RAC noted that they appreciate the level of detail and information in the tables, as well as new alternatives to consider. The RAC also noted that they have spent a lot of time considering the various issues as they affect the Town and property owners and will need the agencies to address the many questions laid out in the recent cross-cutting criteria and other considerations memos before being able to offer any recommendations on final alternatives. GeoInsight noted that they continue to keep the issue of project phasing before the agencies.

## **Town Council and Other Considerations**

The RAC discussed the role of the Town Council in this screening of alternatives. All agreed at this point there were too many alternatives for the Council to be able to assist in any detail. However, once the final several alternatives were developed and analyzed, the Council would need to be informed by the RAC in detail. The RAC discussed the upcoming Mayoral election and noted that though this may change the political dynamics in town – including potentially even the RAC itself given that the Council created it – the RAC should just proceed with its work.

RAC members brought up the long-standing RAC recommendation for the Town to hire an environmental attorney and technical person, especially one who could work across the various departments (DPW, conservation commission, DOH) and issues (Raymark, Army Engine Plant,

other). Two RAC members agreed to draft a letter and have the RAC review it via email then sign it in June.

### **Brief OU9 RI Update**

EPA provided a brief update on the OU9 RI. Comments were received from Geo, the Town, DEP and the DOH. EPA hopes to respond within about 3 weeks. Comments are in general were not major in terms of revisions. CT DEP provided 11 comments; DPH, 10 comments, the Town 22, and GeoInsight provided 127 comments. General comment themes included the risk from users and exposure pathways and how they were calculated. Specifically, who are the receptors and why. One issue is if one assumes a future residential use on OU9, the risk calculation determines that there is unacceptable risk. However, a land use restriction would most likely alleviate that risk without major remediation. The EPA tested from from 0 to 2 and 2 to 4 feet, then returned to test from 0 to 6 inches. That was when they found only two locations for low levels of contamination.

The Health Department reiterated that there are no imminent or concerning health risks from OU9. The few hits found will be addressed quickly. The Health Department noted relief that Short Beach Park poses no imminent risk. The Department noted it will need maintenance but that the cover put in place is doing its job. A RAC member asked how deep is the waste on the landfill portion of OU9. EPA noted it varied considerably, but was as deep as 15 feet in some cases.

### **Final Items, Next Steps and Adjourn**

EPA reminded the RAC that they would be undertaking, as required by law, a 5-year review, primarily of OU1. The review is due by September.

After discussion, the RAC agreed to invite Congressional staff to observe the next RAC meeting. The meeting will include detailed RAC discussion of the current alternatives and will seek to prioritize those for further discussion with the agencies. A RAC member sought the name of the CT DEP RCRA person to address a trust fund accounting issue and its possible release for site protection and characterization. DEP and EPA agreed to identify the appropriate state or federal person.

The meeting adjourned at 9:00 PM.