

FINAL REPORT
Raymark Advisory Committee
Section I: RAC Accomplishments
Operable Unit 6 (OU6)
September 4, 2007

The Raymark Advisory Committee (RAC) was formed in June 2000. It is comprised of a diverse range of stakeholders, appointed by the Town Council. Members include property owners with properties incorporated in the Superfund site, small business people, neighbors abutting contaminated properties, and other interested citizens. The RAC has been actively supported by the Stratford Health Department since its inception. Key councilpersons, state elected officials, and Congresswoman DeLauro's office have been active in supporting and following the RAC through the years. The RAC's formation was precipitated by strong community opposition to the U.S. Environmental Protection Agency's (USEPA's) 1999 proposal to move 35,000 cubic yards of waste from the Boat Club, also known as Operable Unit 5 (OU5), to the former Raysbestos Memorial Ballfield (OU4).

In 2000, as the RAC began:

- it was estimated as much as 1,000,000 (one million) cubic yards of waste would have to be addressed and potentially consolidated;
- the full list of properties that were in and not in Superfund Operable Unit 6 had not been developed, resulting in substantial uncertainty as to who was in or out affecting as many as 500 properties;
- the Shore Road (OU5) proposed dig-haul-consolidate would have left an active dump site open indefinitely at the Ballfield (OU4);
- only one consolidation site (OU4) for waste had been identified and accepted as viable by the USEPA and Connecticut Department of Environmental Protection (CTDEP);
- a consistent, clear definition of Raymark waste had not been developed to guide remedial investigations and cleanup activities;
- little consideration had been given to potential redevelopment of contaminated commercial sites after cleanup was completed;
- the extent of ground water impacts (OU-2) and its potential risks to property owners had not been determined; and,
- citizens had not been directly involved in Raymark Superfund site decisions or activities for many years, which, given a range of remedial activity impacts experienced in the Town, resulted in a high degree of mistrust of USEPA and CTDEP.

Since the RAC began its work, through seven years of hard and long work of committed, engaged citizens, the RAC has attained a number of major accomplishments that include, but are not, of course, limited to:

I. Defining, Refining, and Narrowing Estimated Volumes for OU6 Properties

- The RAC advocated for and obtained a final technical definition of Raymark waste that is defensible, rationale, and clear. Without this definition, a technical determination of what properties were in and out of OU6 was not possible. In addition, the definition provided a clear criterion for identifying completion of remedial activities.
- The RAC advocated for and ensured that an identifiable, limited number of properties were included as Superfund properties within OU6 and, thus, at the same time, helped clear hundreds of properties from the potential taint of Superfund.
- The RAC advocated for and obtained assurances that properties abutting Superfund OU6 identified properties were no longer identified as part of the Superfund site, lifting the Superfund-related constraints from those properties.
- The RAC advocated for and obtained an analysis of estimated soil volumes for cleanup at the 26 OU-6 properties that was based upon actual analytical data for soil and not on the assumption of waste to the water table across the full areal extent of each contaminated property, thus significantly reducing the total estimated volume of waste that would have to be addressed from hundreds of thousands of cubic yards to about 100,000 cubic yards.

II. Influencing Interim Actions at OU5 and with Residential Properties

- The RAC advocated for and ensured that the existing, functioning cap on the Boat Club (OU5) would remain, despite an effort to expend as much as \$11 million to “recap” that facility, create more construction disruption, and expend a substantial sum of limited Raymark special account monies for no clear gain on a single property, a decision that would have left many of the OU6 properties unaddressed for a long period of time.
- The RAC actively advocated for and supported agency actions addressing immediate health threats (such as the soil vapor treatment systems installed in over 100 homes due to potential for groundwater-related VOC exposures in indoor air).

III. Influencing Overall Cleanup Strategy and Alternatives Analysis

- The RAC advocated for and obtained a commitment to a comprehensive, coherent, and not piecemeal approach to cleanup.
- The RAC advocated for and received commitment and action from USEPA and CTDEP to actively seek out and evaluate additional potential consolidation sites in Town (other than the Ballfield, OU-4, which was always under consideration) and to have both agencies to commit that, if they had to consolidate, they would do so at more than one site.

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Comment:

- The RAC advocated for and actively sought and required of USEPA and CTDEP information regarding as many alternatives to consolidation in Town as possible, including removal out of town, on site treatment, and capping in place.
- The RAC advocated for, helped fund and staff, and otherwise supported the Superfund Redevelopment Initiative (SRI) to identify the redevelopment potential for contaminated commercial properties.
- The RAC actively sought out and explored alternative, innovative technologies, such as low-permeability asphalt capping (one brand name is known as MatCon), in an effort to increase the efficiency of use of existing remedial funds and reduce construction risks.
- The RAC advocated for and required of the agencies detailed operations and maintenance costs and for those costs to be borne by the Superfund program and the agencies, rather than the Town and its citizens, small businesses, and property owners.
- The RAC reviewed and commented to the agencies on multiple Remedial Investigations for OUs 2, 3, 5, 6, 7, and 8, as well as many work plans, draft Feasibility Studies (FS), and other technical documents.

IV. Obtaining Answers

- The RAC advocated for and obtained a clear, on-going accounting of monies spent to date on agency actions, as well as remaining monies retained in the Raymark Special Account. The RAC also consistently advocated for efficiency in the activities of USEPA's contractor to preserve as much money for remediation as practicable.
- The RAC invited and received a presentation by one of the lead administrators of the national USEPA Superfund program to explain the tight limitations and constraints on federal dollars nation-wide for USEPA-lead sites (of which Raymark is one of many).
- The RAC posed questions and aggressively pushed for answers to numerous liability issues facing property owners.
- The RAC sought clear answers on numerous regulatory constraints influencing remedial decisionmaking, from state leachability standards to wetlands and floodplain restrictions.

After seven years of challenging, long, and complex work, the RAC has learned a great deal, influenced agency action and thinking significantly, and has developed final recommendations to the Town Council on the cleanup of the Operable Unit 6 (OU6) properties. The two accompanying memoranda describe the numerous limitations faced by the RAC in considering what alternatives are feasible from a technical, legal, regulatory, and financial perspective, as well as the specific RAC recommendations for remedial action at Operable Unit 6 of the Raymark Superfund Site.