

EPA & CTDEP's Proposed Option for Remedial Action at Raymark OU6

Goals:

- Address highest risk area(s) first.
- Finish any area once started.
- Utilize Raymark Special Account monies (approximately \$20 million currently available) to provide final protective remedies for as many properties as possible¹.
- Provide low, long-term Operation & Maintenance (O&M) costs while being protective.
- Provide protective measures during construction.

Description of the option²:

Most privately-owned OU6 properties would receive final, protective remedies (4 ft excavation with Environmental Land Use Restrictions (ELURs)). The majority of Raymark waste excavated would be consolidated at OU4 (the former ballfield that presently contains approximately 200,000 cubic yards (CY) of Raymark waste). Excavated materials would be consolidated at OU4 to a depth of approximately three to four feet then capped. All work would be closely coordinated with the Town and local citizen representatives to address issues such as, but not limited to, buffer zones/barriers, environmental monitoring, truck routes, and other measures that would be included in a health and safety plan developed by the Agencies, with input from the Town and community representatives.

The properties identified with the highest Human Health and Ecological risk are principally the properties located along upper Ferry Creek. These include 230, 250, 280 & 300 Ferry Blvd, Lot behind 326 Ferry Blvd & the vacant lot off Housatonic Ave. and 576 & 600 East Broadway and should be addressed first. These properties also have the largest volume of waste material of the OU6 properties. 200 & 326 Ferry Blvd each have a small quantity and would be addressed while actions are being conducted at other OU6 properties in their vicinity. The East Main Street and DPW properties would be addressed next due to risk and proximity to OU4. Based on risk and public access, the Beacon Point area would be next followed by Third Ave, Wooster Park and the CT Right-of-Way and I-95 lot.

The excavation volume for this option from all OU6 properties is approximately 50,000 CY. It is assumed that an estimated 10% of the excavated waste will be sent out of town for disposal. If the actual amount of Raymark Waste that needs to be excavated at the OU6 properties listed above is less than estimated and if funding allows, the OU6 property referred to as "Lockwood Ave." would also be addressed at this time.

¹ It should be noted that each cubic yard of material shipped out-of-town costs the same as approximately 5+ cubic yards consolidated in-town. Therefore, increasing the volume to be shipped out-of-town, directly reduces the number of properties that can be remediated at this time. (For example, increasing out-of-town disposal by an additional 5,000 CY would result in approximately 25,000 CY of Raymark waste to be left for future clean-up and additional funding).

² Pursuant to the legal requirements of the Superfund law, EPA must issue a proposed cleanup plan for public comment, review public comments received, and only then issue a Record of Decision (ROD) that selects a remedy. The preferred option in this document is a recommendation to senior agency management regarding the contents of a draft proposed cleanup plan, which will be subject to further public comment.

Approximately 42,500 CY of excavated Raymark waste would be consolidated at OU4. This volume would increase the elevation of OU4 by approximately three feet. The consolidated material would then be capped with an impermeable RCRA C-type cap and approximately two to four feet of clean fill and cover materials. The final elevation of the area could be designed to be flat and could accommodate a Town decision on future reuse of the area. Rain and snow melt would be shed off the cap and be controlled by appropriate storm water management controls specifically designed for the property.

Finally, vapor control systems for new homeowners with houses located above the groundwater plume existing from the former Raymark facility (houses where the previous owners refused systems) could be offered following the implementation of town-established local land use controls.

Next Steps

Prepare the OU4 property to receive excavated material (funding to cap the OU4 property would be set aside; \$10 million from Raymark Special Account). Excavation to four feet below ground surface would occur at the Lot behind 326 Ferry Blvd and the vacant lot off Housatonic Ave (\$770K), 230, 250, 280 & 300 Ferry Blvd (\$3.57M), 200 & 326 Ferry Blvd (\$210K), 576/600 East Broadway property would be capped on-site (\$2M), 251 East Main Street & DPW AOC2 (\$272K), 250, 304, 340 & 380 East Main Street (\$465K), DPW AOC1 (\$614K), Beacon Point AOCs 1, 2 & 3, (\$771K) Third Avenue & Wooster Park (\$300K), the Vacant lot off I-95 (\$200K), CT Right of Way (\$160K), and Lockwood Ave. (\$1.5M). **The total cost estimate is \$19.5 Million with the excavation of approximately 50,000 CY of material (consolidation of about 42,500 CY at OU4 and approximately 5,700 CY sent for off-site disposal).**

Note that this option proposes consolidation of approximately 42,500 CY, even though the consolidation capacity of OU4 is at least 150,000 CY. As for disposal, all excavated wastes with concentrations above certain regulatory standards would be taken out of town (est. to be 5,700 CY). Additional material is not recommended for out of town disposal because (1) it would not achieve additional risk reduction for the town residents whether or not they live near a consolidation area, (2) greater risk reduction would be achieved by permanent remediation of more, not fewer properties in town, (3) final cleanup could begin much more quickly on more properties by expending currently available funding on cleanup efforts instead of on disposal costs, and (4) it is unknown how much or when additional funding might be available.

Future Steps

Once the OU4 property is capped, all remaining Raymark waste will need to be addressed when additional funding becomes available. Such future work would include the Airport Property (and any remaining OU6 properties not previously remediated), OU3-Upper Ferry Creek, potentially OU5-Shore Road, OU7-hotspot removal, and OU8-hotspot removal. The estimated volume for the above operable units is 80,000-90,000 CY. Remediation will also be needed at OU9-Short Beach Park/Stratford Landfill.