

Raymark Superfund Team (RST)
November 3, 2008
Proposed Action Plan by PMRohaly

Main Issues:

- 1) Toxic waste in the town of Stratford has:
 - a) Jeopardized public health.
 - b) Stopped properties from being used and or developed.
- 2) EPA's Plans to create consolidation sites, CAMUs, adjacent to residential properties has met with strong opposition.
- 3) No plans to date, from the EPA or DEP eliminates or minimizes the impact on Stratford residents.

Main Obstacles:

- 1) Limited funds- Only \$21 million available for clean up action at present time. Raymark waste left in town are a \$200 million problem.
- 2) Current laws greatly reduce remediation options and impose costs.
- 3) Public outcry not to consolidate toxic waste in residential neighborhoods.
- 4) The "RAYMARK BILL" has become law in Connecticut. Law limits consolidation of toxic waste in residential to 1,000 cubic yards. Would need a two thirds vote in municipality to exceed this limit.

Solution Needs:

- 1) EPA & DEP needs to start listening to Stratford's public, this can not be emphasized enough.
- 2) Agencies at the table of the RST need to tell their superiors and review boards that the final plan has been formed in part by public demand and not just simply recite rules and regulations.
- 3) Take care of the greater risk sites first.
- 4) **Consolidation adjacent to residential areas needs to be kept to a minimum.**
- 5) **Move the consolidation site away from residents:** Create a buffer between residents homes and the CAMU site. A strip adjacent to Patterson & Clinton Ave. homes can be used as a buffer zone and a linear park (possibly for residents and their dogs). Pull back material 50' to 100' from property lines, erect barriers, add clean fill as needed and keep waste away from family homes.
- 6) Any remediation site plan needs to have funds set allocated at aside at it's start to insure closure of that site. Do not leave a site open and unfunded.
- 7) Leverage funds from closing (capping) the town dump to aid capping OU9 (Short Beach).
- 8) EPA needs to adopt the RAC's 9/4/07 "Construction Health and Safety Controls" for Raymark clean up (From the Raymark Advisory Committee "Final Report" section III, September 4, 2007).
- 9) Start NOW and use all of the \$21 million.

Plan proposal:

Handles Raymark waste in three phases. Phase 1 will take care of what can be done with the existing funds. Phase 2 will address untouched sites as well as cap Short Beach (OU9). Phase 3 deals with balance of the issues.

Proposed Plan #1:

1) Phase I - Treat high risk properties, spend a max of \$21 Million:

a) **Cap 576 & 600 East Broadway (Morgan-Francis) property in place.** No off site consolidation needed. Estimate \$1.8 million.

i) Ranked #2 of the **highest risks** (per EPA).

ii) **No opposition** to capping in place.

iii) **Can start NOW**

iv) One of the **highest risks** (per EPA in RST meeting).

b) **Limited Consolidation at OU4 (Ballfield) \$19.2 Million Max:**

i) **Move consolidation area away from residents. Create barrier strip between OU4 and residential properties. See attached figure.**

ii) **Funds must be allocated to this project at it's start and once started it will be completed with a permanent cap within three years.**

iii) Consolidation to be from the following properties, base on moneys available, limiting consolidation and not overwhelming a second consolidation location:

1&2) Vacant lot @ Housatonic Ave (Highest Risk Ranked by EPA) & Lot behind 326 Ferry Boulevard.

3) Third Ave.

4) Wooster Park.

5 & 6) 200 & 326 Ferry Boulevard

7) 250/304/340 East Main.

8) 380 East Main St.

9) Lockwood Ave.

10 & 11) DPW Lot AOC 2 & 251 E. Main St.

12) DPW Lot AOC1.

c) The above takes achieves the following:

a) Takes care of 15 of the Raymark sites including the top two most hazardous.

b) Puts a permanent cap on OU4 (the Ballfield).

c) Moves waste away from residents.

d) Puts a permanent cap on the Morgan-Francis property.

e) Keeps just under budget - will need additional funds to create barrier strip.

f) Does not over burden the remaining two possible consolidation sites.

g) Consolidates properties near OU4 at OU4 (less movement of waste).

2) Phase 2 - Obtain Additional Funding & Consolidate @ OU9:

a) Obtain additional funds. Need an estimated \$59 million in funds.

b) **Treat OU2, treat the ground water in place.** Estimate \$5 million.

i) One of the **highest risks** (per EPA in RST meeting).

ii) **No opposition** to treating in place.

iii) **Can start as soon as funds are available.**

c) Consolidation at OU9. Consolidation to be from the following properties:

- 1,2,3,& 4) 230/250/280/300 Ferry Boulevard.
- 5) Beacon Point AOC 3.
- 6) Vacant DOT lot abutting I-95.
- 7) CT right of way property.
- 8) Beacon Point AOC 1
- d) The above properties have an estimate of 58,726 cubic yards and a cost of \$57.8 million.

3) Phase 3 - Cap OU3 Upper Ferry Creek & Maintain existing covers.

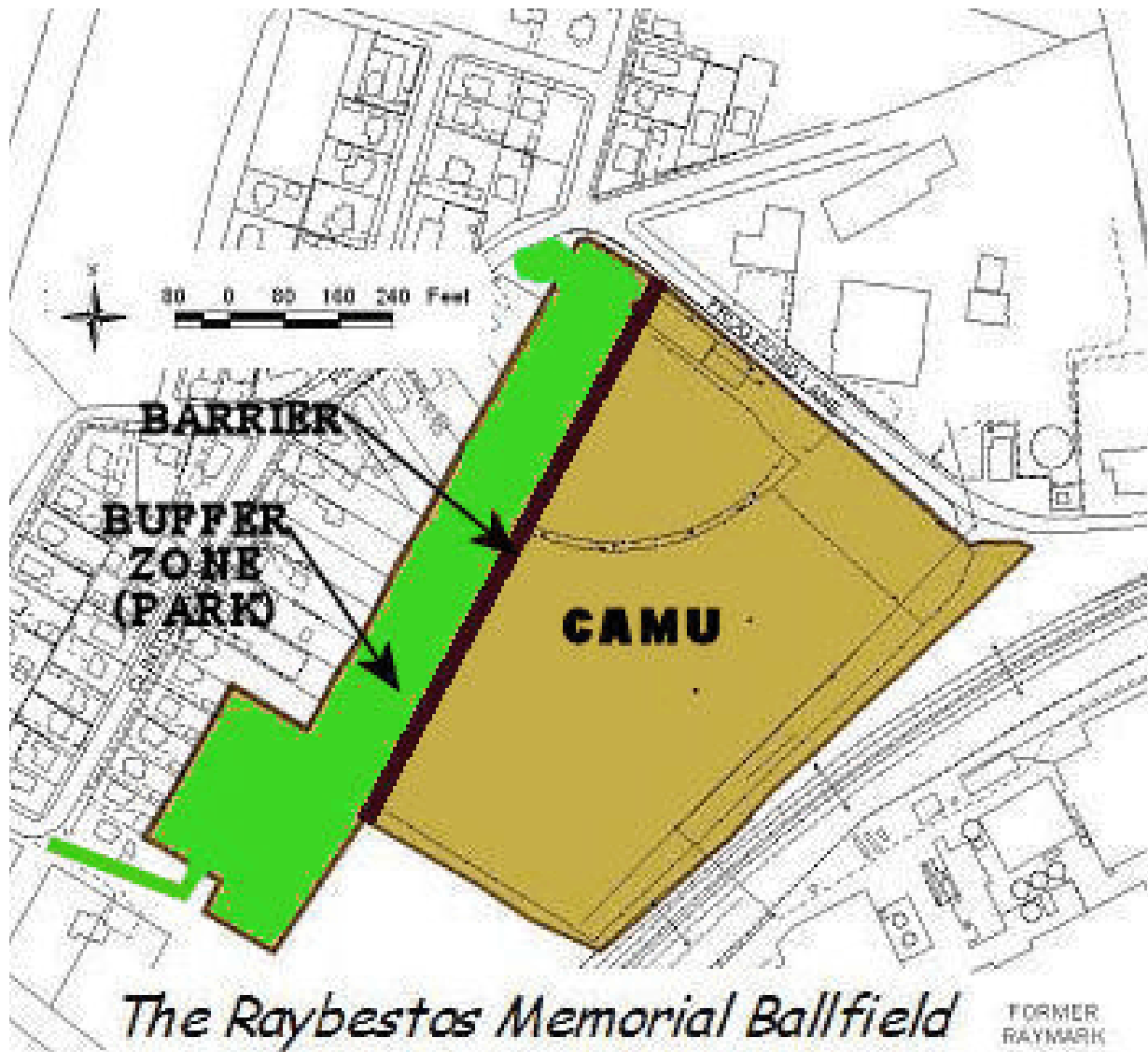
- a) Obtain additional funds. Need an estimated \$26 plus million in funds.
- b) Maintain existing covers (temporary caps) on OU5 Shore Rd and the Housatonic Boat Club.
- c) **Consolidate the remaining properties at OU3 Upper Ferry Creek.**
 - 1) Airport Property North of Marine Basin Property.
 - 2) Lower Ferry Creek.
 - 3) Ferry Creek - Beacon Point/Elm st wetlands.
 - d) The above properties have an estimate of 22,667 cubic yards and an unknown cost (excess of \$26 million dollars).

Plan#11

OU	RAC Priority (Table 2 GEO 8/14/07)	EPA Priority (Table 1A)	Property	General Notes	Remediation Option (See Note 2)	Phase I - Soil to be consolidated at OU4		Phase I - Cost Estimate		Phase II Soil to be consolidated at OU9		Phase 2 - Cost Estimate		Phase III - Cap in place		Phase 3 - Cost Estimate	
						Cubic-Yards	\$	Cubic-Yards	\$	Cubic-Yards	\$	Cubic-Yards	\$	Cubic-Yards	\$		
OU1	-	-	Original Site - Stratford Landing	Clean-up complete	2	0	\$0	0	\$0	0	0	0	0	0	0	\$0	\$0
OU2	-	-	Ground Water	No FS. go directly to remediation action	8	0	\$0	0	\$0	0	0	\$5,000,000	0	0	0	\$0	\$0
OU3	-	-	Upper Ferry Creek	This site alone exceeds current funds	2	0	\$0	0	\$0	0	0	\$0	0	0	0	\$25,261,222	\$0
OU4	-	-	Ballfield	Use as CAMU for phase I	2	0	\$10,660,953	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU5	-	-	Housatonic Boat Club & Shore Rd	Temporary Cap is in place now	1A	0	\$0	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	1	24	Third Avenue Property	Residential Property	4	756	\$270,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	3	18	Wooster Park Property		4	1,896	\$342,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	6	13	200 Ferry Boulevard		4	488	\$230,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	6	23	326 Ferry Boulevard	Grouped together	4	600	\$290,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	11	20	250 East Main Street		4												
OU6	11	7	304 East Main Street	Grouped together near OU4	4	3,960	\$670,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	11	15	340 East Main Street		4												
OU6	5	16	380 East Main Street	Near OU4	4	29	\$180,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	10	-5	Lockwood Ave		4	15,996	\$1,860,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	4	2	576 East Broadway	Morgan Francis Property -	2	0	\$1,800,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	4	14	600 East Broadway	Grouped together - No offsite	2												
OU6	9	5	230 Ferry Boulevard		4												
OU6	9	4	250 Ferry Boulevard	Grouped together	4	0	\$0	45,333	\$0	45,333	\$5,050,000	0	0	0	0	\$0	\$0
OU6	9	3	280 Ferry Boulevard		4												
OU6	9	6	300 Ferry Boulevard		4												
OU6	23	11	DPW Lot AOC 2		4	6,720	\$2,200,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	8	8	251 E. Main St	Grouped together near OU4	4												
OU6	24	10	Beacon Point AOC 3		4	0	\$0	6,720	\$1,200,000	6,720	\$1,200,000	0	0	0	0	\$0	\$0
OU6	2	9	Lot Behind 326 Ferry Boulevard		4												
OU6	2	1	Vacant Lot at Housatonic Avenue	Grouped together	4	10,680	\$1,300,000	0	\$0	0	0	\$0	0	0	0	\$0	\$0
OU6	25	25	Vacant DOT Lot Abutting I-95 Property		4	0	\$0	3,240	\$477,000	3,240	\$477,000	0	0	0	0	\$0	\$0
OU6	25	-3	Connecticut Right-of-Way Property		4	0	\$0	1,913	\$353,000	1,913	\$353,000	0	0	0	0	\$0	\$0
OU6	23	-	DPW Lot AOC 1	Near OU4	4	6,400	\$808,000	0	\$0	0	\$0	0	0	0	0	\$0	\$0
OU6	24	21	Beacon Point AOC 1		4	0	\$0	1,520	\$394,000	1,520	\$394,000	0	0	0	0	\$0	\$0
OU6	7	-	Beacon Point AOC 2	Waste is below water table - Property likely to be remediated without generating Raymark Waste	1A	0	\$0	0	\$0	0	\$0	0	0	0	0	\$0	\$0
OU6	26	25	Airport Property North of Marine Basin Property	Near OU9	4	0	\$0	0	\$0	0	\$0	0	0	9,300	\$1,080,000	\$0	\$0
OU7	-	-	Lower Ferry Creek		4	0	\$0	0	\$0	0	\$0	0	0	10,557	\$0	\$0	\$0
OU8	-	-	Ferry Creek - Beacon Point/Im St wet lands		4	0	\$0	0	\$0	0	\$0	0	0	2,810	\$0	\$0	\$0
OU9	-	-	Short Beach Park & Stratford Landfill	Use as CAMU for phase II, get additional funds for closing land fill	2	0	\$0	0	\$0	0	\$0	\$45,365,027	0	0	0	\$0	\$0

Notes:
 1) AOC = Area Of Concern
 2) Recommendation Alternatives (Options):
 1A = Do nothing - Five Year Reviews
 1B = Do nothing - Limit access, land restrictions, fence etc.
 2 = Cap in place - No Excavation of Soil
 2A = Cap in place - Any Excavated Soil sent to RCRA facility.
 2B = Cap in place - Any Excavated Soil sent to in town CAMU.
 3 = Excavate and ship to a RCRA facility (Out of town)
 4 = In town consolidation - Create one or more CAMUs.
 8 = Treat in place

47,525 \$20,610,953 58,726 \$57,839,027 22,667 \$26,341,222



The Raybestos Memorial Ballfield

FORMER RAYMARK