

Working with CTDEEP and the Town of Stratford, and based on community input, EPA Region I has outlined a conceptual approach to safely and completely address waste from the former Raymark manufacturing facility that has been identified at numerous locations throughout Stratford.

The Raymark Waste that remains in Stratford presents a threat to human health that needs to be addressed. The conceptual approach is comprehensive in that it addresses all Raymark Waste in residential, commercial, and recreational properties, including Ferry Creek and groundwater emanating from the former Raymark facility.

This conceptual approach is likely to cost at least \$100 million, which exceeds the remaining amount in the Region's Raymark dedicated Special Account. EPA Region I will seek funding for the project as one comprehensive plan so that the project will be funded and completed in a coordinated and timely manner. Given support for this project at the highest levels of CT DEEP and of EPA in Washington DC, we now have a unique opportunity to fund, execute and complete the entire Raymark cleanup and make a real environmental and economic difference for the people of Stratford.

We expect that not everyone may like every aspect of this plan. This plan includes a proposal to consolidate a portion of the waste in Stratford, a concept that we know is not a favorite option for many in Stratford. However, doing some consolidation, safely and expeditiously, allows for the entire problem to potentially be addressed now rather than waiting for a more uncertain, future funding stream. In addition, the conceptual approach as currently written also envisions shipping approximately half of the Raymark Waste to secure disposal facilities outside of this community. In developing the plan, EPA has listened to the community's concerns about what is important in executing this type of major construction project. We want to assure you that protecting the health and well-being of the people of Stratford is EPA's primary job and we take that very seriously. We also commit to continuing to listen to the community's concerns in coming months and taking advantage from lessons learned in the past at this project and others across New England.

This conceptual plan is not a final decision. We are seeking public input in developing this plan, and we will be formally proposing, for public review and comment, cleanup plans for individual operable units as technical details of the proposed cleanup plans for each operable unit are developed. By the end of calendar year 2015, EPA hopes to propose two cleanup plans, one for the overall groundwater area (OU2), and one for the former Raybestos Memorial Field (former ballfield) (OU4), Upper Ferry Creek (OU3), and approximately 20 properties remaining in OU6 where EPA had previously completed feasibility studies in 2010. Public comments and EPA response to these comments are required before we can make any final cleanup decisions for any of the remaining OUs at the site (OUs 5, 7, 8 and 9). We want to engage the public early and often as we develop and propose this comprehensive cleanup plan.

Below are some highlights of the conceptual comprehensive plan.

- A combination of consolidation and capping will enable the reuse of the former Raymark ballfield disposal site, potentially as a DPW yard, with a buffer zone for residents, and an improved traffic pattern for the neighborhood that takes trucks off residential streets.
- EPA currently envisions shipping approximately half the excavated Raymark Waste off-site to a licensed disposal facility, including the most hazardous of excavated waste.

- EPA intends to set a limit on the volume of material that will be consolidated in Town at the former ballfield. That volume will be based on the objectives of keeping the material separated (both vertically and horizontally) from surrounding neighbors, using enough consolidation material to effectively redevelop the former Raymark ballfield property, and creating a cost-effective remedy that is technically practicable. Once the volume is reached, any additional or unexpected material generated as part of the Raymark cleanups around town will also be shipped off site.
- The Region will seek funds for the cleanup of the entire site. If funding is approved, we expect to receive annual allocations of funds throughout the Site cleanup, and maintaining ongoing work is one of EPA's top priorities. EPA will not start work on any property without having a commitment for funds to completely and timely finish work on that property.
- The project will be safe, cost-effective, address individual properties in a timely manner, and ensure closure for the community and individual property owners.
- Community-wide and neighborhood considerations include, but are not limited to:

Construction Management/Health and Safety

- Coordination of all activities with Stratford Health Department
- Keeping any remediation activities as far away from abutting neighbors as possible
- Constructing vertical barriers between residents and the construction, with particular consideration to the area between the former Raymark ballfield and abutting neighbors
- Real time particulate sampling which can immediately identify and correct any potential problem
- State of the art dust suppression throughout the construction project, including a consideration of utilizing enclosures to manage material within the largest construction areas
- Fully secure and covered dump trucks moving materials both for on-site and off-site disposal
- Creating traffic pattern improvements near the former Raymark ballfield, to minimize truck traffic in the neighborhoods during and after the cleanup
- Restrictions on hours of work in areas close to residential neighborhoods, likely to include maximum 12-hour days
- Consideration of the use of green construction vehicles which minimize exhaust emissions
- Drainage improvements for areas adjacent to former Raymark ballfield
- Expediently completing cleanup at each property with a goal of no more than two years of construction/disruption at each location (more construction seasons may be necessary at the consolidation area)
- Details regarding Construction Management and Health and Safety will be developed in plans created for each work area.

Communication with Community and Affected Property Owners

- Regular neighborhood meetings before, during and after the construction project

- Early notification and extensive coordination with property owners in advance of cleanup on their properties
 - Neighbors adjacent to properties subject to construction will also have early notification and coordination
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- Cleanup actions will help to make the abutting Contract Plating property and potentially the existing DPW yard available for potential redevelopment.
 - EPA will seek to plan, finalize, and fund the project in a timely manner and provide final remedies that will allow for continued use, reuse and redevelopment of the many properties that have been abandoned or impacted due to the presence of Raymark Waste.
 - EPA will issue a proposed plan for public comment to address the overall groundwater area (OU2). This proposed groundwater plan will be developed concurrently with the proposed plan to address consolidation/capping at the former Raymark ballfield. EPA is and will take steps to ensure that the vapor mitigation systems are effective in addressing the risk to human health from contaminated groundwater.
 - EPA will work with the Town to ensure all parties are provided with accurate and timely information and all stakeholders' technical and logistical questions are answered promptly.
 - EPA must solicit public comment regarding the formal proposed plans for each operable unit. EPA, CTDEEP, and the Town of Stratford invite additional public input and discussion during the development of cleanup designs and schedules for each operable unit.

Estimated timeline, subject to the consideration of public comments for each OU, securing funding, and other issues:

April 2015	EPA Removal Program completes oversight of the cleanup of Raymark Waste at Airport.
September 2015	EPA issues proposed cleanup plan for overall groundwater area (OU2), and a separate proposed cleanup plan for combined former Raybestos Memorial Field (OU4), Upper Ferry Creek (OU3), and approximately 20 properties remaining in OU6.
Oct.-Nov. 2015	Public comment period for OU2 and OU3/4/6 Proposed Plans, EPA accepts comments in writing and during a public hearing.
March 2016	Records of Decision (RODs) selecting cleanup remedies for OU2 and OU3/4/6.
March-June 2016	Begin work to design cleanup remedies for OU2 and OU3/4/6. EPA expects HQ feedback on its comprehensive funding request for entire site.
Fall 2016	EPA issues proposed cleanup plan for Lower Ferry Creek (OU7) and Beacon Point/Elm Street Wetlands (OU8).

2016-2017	EPA issues ROD for Lower Ferry Creek (OU7) and Beacon Point/Elm Street Wetlands (OU8). EPA issues proposed cleanup plan for Short Beach Park & Landfill (OU9).
2017-2018	Implement remedy for OU2.
2017-2020	Implement remedy for OU3/4/6.
2019-2020	Issue proposed cleanup plan for Shore Road and Housatonic Boat Club (OU5).

Ongoing:

- Working with Town on Institutional Control options for Vapor Intrusion Zone.
- Working with Town on finalizing Institutional Controls at Beacon Point/AOC 2 (parking lot, part of OU6, addressed by existing partial ROD).
- Working with Town and potential developer regarding design of 576 & 600 East Broadway properties (part of OU6, addressed by existing partial ROD).

Raymark Industries, Inc. Superfund Site Current team members

EPA:

- Ron Jennings, Project Manager
- Jim DiLorenzo, Project Manager
- Jim Murphy, Community Involvement Coordinator
- Emily Bender, Community Involvement Coordinator

CT DEEP:

- Ron Curran, Project Manager
- Patrick Bowe, Chief, Remediation Division

Town of Stratford:

- Andrea Boissevain, Director of Health

For more information, please contact Emily Bender, EPA Community Involvement Coordinator, 617-918-1037, bender.emily@epa.gov