



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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**STATE OF CONNECTICUT**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**



Via Electronic and U.S. Mail

February 20, 2009

Raymark Superfund Team  
Stratford, Connecticut

Dear Raymark Superfund Team Members:

Just seven months ago our progress in reaching a cleanup solution to the widespread environmental contamination at the Raymark Industries site in Stratford had come to a standstill. Concern and frustration on all sides had replaced the positive exchange of ideas and community-wide cooperation that had served as the foundation for the successful cleanup of multiple private and public properties and the redevelopment of the former Raymark facility.

Late last summer, the leadership of our agencies met with you - Mayor Miron and his staff, other elected officials, and representatives of the Raymark Advisory Committee and Save Stratford - in an effort to find common ground on potential cleanup options to address the remaining Raymark waste locations in Stratford. We accepted the challenge together and agreed to work intensively for several months to identify specific options to allow us to get back on track and again move forward with cleanup and redevelopment now and into the future at the Raymark site.

We want to gratefully acknowledge the December 19, 2008 memorandum from the Raymark Superfund Team providing a comprehensive list of short- and long-term recommendations to address the remaining widespread Raymark contamination throughout the Town of Stratford. We further acknowledge Mayor Miron's February 5, 2009 letter of specific commitments to work with CTDEP, EPA, local citizens, and businesses to ensure a safe, expeditious and comprehensive cleanup of Raymark waste in Stratford. We commend you for all the hard work and are heartened that the parties have moved closer to consensus than ever before.

We both are very appreciative of the enormous time and effort spent by the Team in dealing with this most complex situation to try to reach an understanding between the local residents and the governments on a way forward that can address the interests of all parties. Given that several plans for long-term action emerged from the discussions, it is clear to us that no consensus was reached on a permanent resolution for Stratford's contamination. However, it is also clear that the discussions were beneficial in advancing a clearer understanding of the short, intermediate and long-term challenges we face together.

We are especially pleased to see unanimous agreement on many of the short-term and interim actions and we will move forward to take steps consistent with the Team's recommendations. Any proposed cleanup plans will, of course, proceed through EPA's normal process of taking public comment prior to finalizing the decision in a document called a Record of Decision (ROD).

The agreed upon short-term and interim steps are outlined below.

#### Short-Term Actions

- EPA will propose the cleanup of 576/600 East Broadway (Morgan Francis properties) by capping the waste in place under an impermeable RCRA cap to allow the property to return to active commercial use. The proposed cleanup will include a health and safety plan and address the Town's Beacon Point AOC2 property through the use of institutional controls.

#### Interim Actions

- EPA will propose a plan to install temporary/interim protection of any properties containing Raymark waste where controls to prevent exposures are deemed necessary. These interim protections will be designed to remain in effect until long-term solutions are selected and implemented. Protections to be evaluated include signage, fencing, administrative controls, orders, and/or other methods to restrict access.
- The Town will develop institutional controls for all residential properties with remaining Raymark waste and/or vapor intrusion issues originating from the former Raymark facility. These institutional controls (ICs) should be designed to prevent the sale or development of properties affected by Raymark contamination without full disclosure of the existing conditions. The institutional controls for the area subject to potential soil vapor intrusion should be designed to require that all new construction in the area include provisions for vapor intrusion mitigation in the construction. Once ICs are in place, EPA/DEP will offer to install mitigation systems in homes whose previous owners originally refused systems but have since moved.
- EPA and its redevelopment consultant will begin working with the Town, the State, and local residents over the next 60 days to help the Town develop a conceptual site plan, including artist renderings, for the potential reuse options of Operable Unit 4 (OU 4), the Raybestos Ballfield. We will meet with Save

Stratford and others on an ongoing basis to ensure the upcoming process is both inclusive and transparent. Once the future of the Ballfield property is agreed upon, the Town will need to address ownership of this property and make an arrangement for future maintenance while also addressing liability with EPA and the State.

- EPA/DEP will also begin the engineering evaluation of various cleanup options to address contaminated groundwater originating from the former Raymark facility, as funding allows.

While these above steps are important and necessary, they do not advance a permanent resolution for the extensive Raymark waste deposits and contamination found at many public and private properties in Stratford. This serious situation demands a permanent resolution that is comprehensive and consistent with national policy to ensure the protection of public health and the environment for the long-term. EPA and DEP will continue their efforts to move towards a permanent resolution that first addresses contamination at as many locations as currently available funding allows, followed by actions at other locations as additional federal Superfund Program funding and state matching funds are secured.

Therefore, as we work toward implementing the short- and intermediate-term actions detailed above, we are directing our staff to continue to explore and develop concepts to identify the much needed long-term resolution and develop an appropriate ROD which will permanently address the Raymark waste and contamination in Stratford.

Again, thank you for all your efforts. We will move forward consistent with your short-term and interim recommendations and continue our efforts to communicate with the Town, its residents, Save Stratford, and others.

Sincerely,



Gina McCarthy  
Commissioner  
CT DEP



Ira W. Leighton  
Acting Regional Administrator  
U.S. EPA, Region 1