



# TOWN OF STRATFORD

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## RAYMARK MORGAN FRANCIS PROPERTY NEIGHBORHOOD MEETING

November 9, 2022

### MEETING MINUTES

The Raymark Community Advisory Group, in conjunction with the Stratford Health Department, Environmental Protection Agency, Connecticut Department of Energy & Environmental Protection, and the United States Army Corp of Engineers, conducted a virtual Morgan Francis Property Neighborhood meeting on Wednesday November 9, 2022 via GoToMeeting, pursuant to notice duly posted.

#### TOWN REPRESENTATIVE IN ATTENDANCE

- Andrea Boissevain – Director of Health
- Alivia Coleman – Health Department Program Associate
- Chad Esposito – Parks Superintendent
- Laura Hoydick – Mayor
- Kelly Kerrigan – Environmental Conservation Superintendent
- Amy Knorr – Recreation Superintendent
- Mary Dean – Director of Economic Development
- Rich Fredette – Blight Enforcement Officer
- Bill O’Brien – Town Council 9<sup>th</sup> District, Parks & Recreation Committee Chairman
- Molly Ryan – Constituent Services Coordinator
- Raynae Serra – Director of Public Works
- Kaitlyn Shake – Town Council 2<sup>nd</sup> District
- Chris Tymniak – CAO

#### ENVIRONMENTAL PROTECTION AGENCY (EPA) MEMBERS IN ATTENDANCE

- Taylor Cairns
- Jim DiLorenzo
- Dan Keefe

#### UNITED STATES ARMY CORP OF ENGINEERS (USACE) MEMBERS IN ATTENDANCE

- Michael Looney
- Rachel MacPhee
- Robert Vanoer

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION (DEEP) MEMBERS  
IN ATTENDANCE

- Tony Allevo

DEPARTMENT OF PUBLIC HEALTH MEMBERS IN ATTENDANCE

- Lori Mathieu

OTHERS IN ATTENDANCE

- Various residents

I. CALL TO ORDER

Ms. Coleman began the session at 6:30pm.

II. WELCOME/INTRODUCTIONS/VIRTUAL MEETING GUIDELINES

- Ms. Coleman introduced Town representatives in attendance, as well as those from CT EPA, DEEP, USACE and CT Dept. of Health. She reviewed virtual meeting protocol, and reminded everyone that the meeting was being recorded.

III. BRIEF HISTORY

Mr. DiLorenzo explained Raybestos-Manhattan Company was a 33-acre manufacturing facility which began operations in 1919 until closing in 1989. The company, which made brake pads and clutch plates, allowed liquid wastes to be discharged into unlined lagoons. The sludge/spent solids from these lagoons were used as fill material for low spots on their own property. Additionally, the company gave it away as free fill around town, and was used mostly to fill wetlands. The site of the former Raybestos Company is now the current Stratford Crossing shopping plaza.

Mr. DiLorenzo stated Raymark Waste is a manufacturing waste material from the former Raybestos Industries Inc. facility. This material contained many chemicals known to be hazardous. The definition of Raymark Waste in soil is a single soil sample containing lead above 400 parts per million (ppm) [or mg/Kg], and asbestos (chrysotile only) greater than 1%, and either copper above 288 ppm or polychlorinated biphenyls (PCBs) [Aroclor 1268 only] above 1ppm. Mr. DiLorenzo explained PHCs are a subset of Raymark Waste, and have concentrations substantially higher than the cleanup levels or goals at the site.

Per Mr. DiLorenzo, the EPA's initial response began in 1993, at which time the EPA sampled approximately 500 properties, and excavated Raymark waste from 46 residential properties as well as Wooster Middle School, and was transported/stored at the former Raymark facility. On 4/25/1995 Raymark was listed on the EPA's National Priorities List, also known as the Superfund list. The first Record of Decision (ROD) was made in July 1995 for Operable Unit1 (OU1) and the material there was consolidated and capped. In 2003, Stratford Crossing was built. A second ROD was issued in July 2011 for 576/600 East Broadway (Morgan Francis property).

Mr. DiLorenzo noted the third ROD was issued in September 2016 for the current cleanup work. Approximately 105,000 cubic yards of soil and sediment from OU3 and OU6 will be excavated. About 45,000 cubic yards has been excavated to date. Most of

the waste will be brought to OU4 for consolidation and capping. Per Mr. DiLorenzo, they will backfill all excavations, and all properties will be fully restored. He added there are five remaining operable units to be done: OU2, OU5, OU7, OU8 and OU9.

Mr. DiLorenzo explained cleanup is necessary since there is buried waste near the surface on many properties. Erosion will continue to expose more waste, which could affect future workers and/or anyone digging in the area. Mr. DiLorenzo noted the EPA is required to mitigate actionable exposure risks. He explained once the contaminated material is removed and capped, the area will be effectively managed and monitored indefinitely.

#### IV. NATURE & EXTENT OF CONTAMINATION LOCATED AT MORGAN FRANCIS (MF)

Mr. DiLorenzo noted chemical exposure occurs when your body comes in contact with a chemical and it enters the body via ingestion, dermal (passing through the skin) or inhalation. The types of contaminants found in Raymark waste do not cause immediate symptoms, but they do cause potential long-term health problems if exposed to them, particularly if exposed to them on a continual basis. These are considered toxic effects and carcinogenic effects. Carcinogens cause cancer, and a number of contaminants found in Raymark waste are carcinogens. The average person's baseline cancer risk is not zero. The EPA and those working on this project strive to manage the incidental increases in cancer and to eliminate that potential exposure. In addition to carcinogenic effects, there are also toxic effects to the lungs, heart, liver, stomach, bladder and intestines. Mr. DiLorenzo emphasized no one has been exposed to the contaminants at Morgan Francis (MF) but it needs a permanent solution to ascertain it remains that way in the future.

Mr. DiLorenzo stated this 5.5 acre property is heavily wooded with grass, some woods, a small building and pavement. The Morgan Francis Flagpole Co. operated there from 1948-1980; hence, the EPA's name for this property. There have been many soil samples taken from this property over the years, so they have a good understanding of the nature and extent of the contamination on this site. There is approximately 45,000 cubic yards of buried Raymark waste on this property.

#### V. SUMMARY OF CLEANUP DECISION – JULY 2011 RECORD OF DECISION (ROD)

Per Mr. DiLorenzo, a Record of Decision for this property was made July 2011 to cap the Raymark waste in place, as well as waste from a Third Avenue property and Beacon Point – Area of Concern #2. At that time, a developer wanted to buy the property and planned to reuse it as a storage facility. The original 2014 design of the cap incorporated a majority of the property. The areas of Raymark waste were to be excavated and put under the cap, which was configured based on the delineation of the 100-year flood plain. Per Mr. DiLorenzo, the problem with this site is there is approximately 20'-30' of peat, which does not support any type of building. They are now working with the Town, which owns the property, to develop it for recreational use. Mr. DiLorenzo explained the original design is being updated since it does not cover all the Raymark waste on the property. The State has updated their policies to allow capping and filling of material in a coastal flood zone to expand the cap, which will now cover most of the property and be flatter. Commercial use of the property has been deemed impractical due to the amount of peat. The Town is looking at this property with an

interest toward recreational reuse. This decision is made by the Town, which owns the property, and not the EPA. The current plan includes consolidating approximately 5,000 cubic yards of Raymark waste from an adjacent DOT parcel and a portion of the uppermost Ferry Creek area.

Ms. MacPhee discussed the upcoming field work and sampling approach. Approximately 70 soil borings and 150' soil samples will be collected around the perimeter of the MF property using direct-push soil sampling methods. Minor brush removal will be completed to access sample locations. At this time, the removal of large trees is not planned. All samples will be analyzed for Raymark waste constituents and a limited selection of CT Remediation Standard Regulation criteria. Ms. MacPhee explained this is being done to determine the limits of the cap and support design, as well as characterize the areas which will not be capped. The estimated start date is Dec 2022 and is expected to take ten days to complete.

#### VI. 2014 REMEDIAL DESIGN AND CURRENT DESIGN

Mr. Looney stated the USACE has been tasked with updating the 2014 design for the MF property to incorporate the additional material from the adjacent property and design the cap for future passive reuse by the Town. USACE contracted with a civil and environmental engineering firm WSP, which has offices in Rocky Hill, CT and Portland, ME. The first step of the design approach will be to determine where the limit of Raymark waste is on the property. That material will then be capped in place with a clean buffer along the property. Per Mr. Looney, the site elevation is expected to rise 6', with most of the increased elevation coming from the clean material that will be placed on top of the cap. He explained a typical hazardous landfill cap for this type of work involves a low permeability layer that is a sandwiched material that includes a geotextile fabric and then a geosynthetic clay liner which has low permeability and then a polyethylene plastic liner. About that will be a drainage layer, then a protective soil cover, and then a vegetative soil layer on top. The intent of the cap is to prevent contact with the Raymark waste beneath it and to prevent water from flowing through to the waste below. This means rainwater will permeate through the clean soil layers, hit the impermeable layers, and then flow to stormwater collection structures that will be designed and built on the site. The actual construction is not expected until sometime in 2025. The general construction sequence will be secure the site and establish the perimeter air monitoring systems. Trees and vegetation will then be cleared from wherever the cap will be, and where waste needs to be removed. The site will be prepared to receive additional waste from upper Ferry Creek and the DOT parcel. The site surface will then be graded to accept the cap and the cap materials. The low permeability engineered cap will be placed along with 4' of clean cover materials and eventually landscaped. The cap is being designed to support future use, which will be determined by the Town. Access to utilities will also be provided.

Per Mr. Looney, after the cap is in place, there will be approximately five acres of usable space for the Town to develop and use. USACE will provide site features but will not be designing or constructing the post-closure use features; that will be determined and done by the Town. The primary vehicular access to the site will most likely be from East Broadway. Mr. Looney stated the site will have a generally flat surface to maximize green space. In a preliminary draft concept, Mr. Looney noted as an example, the site

could have a Little League ballfield, a recreational youth soccer field, space for a playground, and parking areas. Mr. Looney explained the EPA considers reuse concepts in the remedial design to ensure the desired end use is safe. They then design and grade the cap to facilitate reuse. He reiterated the redevelopment is a local planning issue and as such the EPA does not select reuse concepts or final plans. Additionally, the EPA cannot fund redevelopment of the property.

Mr. Looney stated the tentative schedule for the MF property is to complete the design update in 2023. In 2024, the administrative requirements, funding and remedial contract actions will be done. Construction could start in 2025, and take approximately 12 months to complete.

## VII. QUESTIONS

- How do you know the cap is still intact and working properly after several years? Mr. DiLorenzo explained they set up a series of monitoring wells around the cap and look for signature chemicals in the groundwater. If the cap is functioning, the contaminant levels will go down over time. More importantly, the cap is maintained under Superfund law by CT DEEP indefinitely. Additionally, there are institutional controls that are put on the deed from a regulatory standpoint as well.
- Why is the plan to cap the waste in place rather than remove it? Mr. DiLorenzo stated the decision to cap was based on the large volume (45,000 cubic yards) of waste there. They are removing the waste from smaller lots with less than 10,000 cubic yards of waste. In a large area such as this, it is more suitable to manage the waste in place.
- What kind of development is not a good idea in a site that is capped? Ms. Coleman noted the Town is looking at a recreational use for this site because it cannot support a building, and some sites have residential restrictions as well. Mr. DiLorenzo added that caps can sometimes handle commercial development such as solar panels and wind farms, and recreational use is also very common. The cap is designed to ensure that everyone who is using the property in the future is safe and cannot come in contact with any of the waste that is buried below. At MF, the spongy peat can support the soil associated with recreational use but it cannot support a building.
- How are you going to remove the hazardous waste and monitor the air quality as this is being done? Mr. DiLorenzo stated most of the waste will be capped in place with minimum excavation. They will create a clean corridor between the capped waste and the residential properties. During any activity where they are handling waste, including excavating and building the cap, there will be an air monitoring program which will give real time dust measurements of particles in the air to keep them to a minimum. Additionally, they keep the material wet so no dust is created.
- As you elevate the cap, is there any chance of potential flooding in the surrounding areas? Per Mr. DiLorenzo, the cap will be designed with a drainage layer. It will be designed with a perimeter drain. The water will be directed to drain into Ferry Creek and to a drainage culvert that is currently going under East Broadway.
- Will the trees, landscape and natural habitat on the site be removed? Mr. DiLorenzo noted a significant amount of the vegetation will need to be removed over the cap. They will try to maintain the mature trees around the perimeter. They do, however, want to create a clean buffer around the entire perimeter of the property. Due to the cap design,

they do not put trees on top of it since the roots would grow down and potentially compromise the important geotextile layer.

- Can nothing be planted once the cap is in place? Mr. DiLorenzo stated grasses and shrubs can be planted, but nothing with a deep root system such as trees.
- Will there be a fence between MF and abutting properties? Per Mr. DiLorenzo, the details of the perimeter will be done during the design phase. Currently, the concept is to create a clean buffer that will be approximately 10' wide, adding they will try to maintain any mature trees. They could add some new trees, and would consider putting up some type of fencing. Abutters may contact him to indicate whether they would prefer vegetation or fencing.
- With the material that seeps in the ground and into the creek, how safe is our drinking water? Ms. Coleman explained most of Stratford receives water from Trap Falls Reservoir in Shelton, so the drinking water is therefore completely safe.
- At what point is the dust considered hazardous and will it be too late to respond? Ms. Coleman stated they calculate, based on health and what chemicals are in the soil, a dust level and then significantly lower it. The air monitors would then alert them before there is the slightest concern, so they can quickly take action before there is a health concern. The numbers they set on the monitors are health based and are set to be health protective so it is therefore very safe. Per Mr. DiLorenzo, air monitoring is a very complex thing to do, but it is important to remember they have the ability to have continuous real time monitoring for dust. The technology does not exist to do so for chemicals and asbestos fibers, but they do measure the amount of dust particles in the air down to a micron level. They have certain thresholds for dust, so if there is too much stuff in the air, it does not mean it is indicative of chemicals or asbestos, but they assume it is out of an abundance of caution. They have air limits, and that data is monitored in real time. The work can be stopped if those levels are too high. Since there is always some dust in the air, that data is collected and submitted to a lab for chemical analysis. That data is returned 2-3 days later. The dust is therefore very crucial as a surrogate for any chemical or asbestos fibers that could potentially be in the air. EPA acknowledges when they are handling this material when there is the most potential exposure risk, and they take every precaution through wetting and watering to keep down any dust or fibers. The real time air monitoring is their assurance that they are not creating any chemical exposure that would present a risk to the workers who are handling this material as well as to the surrounding community. Ms. Boissevain noted she and Ms. Coleman, in conjunction with Meg Harvey from the CT Dept. of Health, look at that data which Ms. Coleman posts on the Stratford Health Dept.'s website for everyone to see. Mr. DiLorenzo's team sends them an email either daily or weekly, but if there is a reason for activities to stop if the dust threshold level is breached, then all work is stopped and they examine what is happening. Ms. Boissevain explained they have done work at Wooster Park and Ferry Blvd. and brought some of the material to the Raymark ballfield, and they are able to do air monitoring there as well.
- If residential reuse is not suitable, how is the surrounding residential area safe? Ms. Coleman stated the neighborhood is safe, but after the capping is complete residential use is not allowed because they could not build a house on site. It also avoids the potential for someone digging through the cap. Mr. DiLorenzo noted the cap is going to create 100% safe conditions. The issue with residential reuse on the property is there will be

contamination 4' down and there is not a lot of regulatory framework for residential properties. They would always worry about someone digging down more than 4' and not being able to regulate their safety in the future. It is therefore more of a regulatory framework than an exposure risk.

- If this site is not suitable to support a building, does this mean there is more hazardous material on this site than the Home Depot/Walmart site? How are these sites different? Mr. DiLorenzo noted he did not work on the cleanup, but explained the Home Depot property had 500,000 cubic yards of Raymark waste on it, while MF has approximately 45,000 cubic yards on it. The Home Depot site did have a very spongy layer on part of the 30 acres, so they had to drive a series of steel piles and build a relieving platform to support those buildings. It was a very complicated geotextile design. Commercial reuse was possible there because developers paid for what EPA considers enhancements for which they cannot pay. On a small property such as MF, EPA cannot pay for piles to go in and build relieving platforms. It will, however, be safe for recreational use. The overall difference is the Home Depot site was a high value commercial property and commercial developers were willing to put in the resources to build on top of that spongy layer while EPA built the cap. MF will be an EPA funded cleanup.
- Please save as many trees as possible and if unable to do so, please replant where possible. Mr. DiLorenzo stated they will do so.
- Is there a possibility to provide a more robust cap in the form of concrete or similar material in lieu of a geosynthetic clay liner? As a civil engineer, Mr. DiLorenzo would support the fact that the geotextile and soil cap is as protective as a concrete or asphalt layer. Mr. Looney explained an engineered cap is a sandwich of material consisting of a geotextile at the bottom which would go above the waste. Above that will be a geosynthetic clay liner, and above that will be a polyethylene rigid plastic layer, and another geotextile above that. These all create an impermeable layer, and a 4' clean soil layer will go above that. Mr. Looney stated there will also be Environmental Land Use controls put on this property, so only certain activities are regulated on the site. There is also a high visibility layer that will protect any breach in the future.
- What are the engineered controls that are being implemented during the capping and after? What kind of monitoring of this site is done post-capping? Mr. Looney explained the engineering controls referred to earlier include wetting the material continuously to ascertain no dust and/or particulates are released into the air. Other engineering controls include perimeter fencing around the site for security, which are 3' jersey barriers on top of which is a 6' chain link fence that is draped in heavy duty sound dampening material. These keep the site secure, as well as provide a visual barrier and limit the noise level. Erosion controls go around the site to keep water in the site under all circumstances. Per Mr. DiLorenzo, the most complex engineering control is the air monitoring. Those stations monitor the air down to a microscopic level. Regarding the long term maintenance and assurance that the cap remains protected, the Superfund law requires the State of CT maintains the cap. If the site was not reused, it would be mowed once or twice a year, and walked to ascertain no trees begin to grow on it, thus protecting the cap from any potential root protrusions. Regardless of how it will be used, a series of monitoring wells will be placed around it as an indication of the effectiveness of the impermeability layer and integrity of the cap. The funding remains in place under the regulatory framework for the State to monitor it indefinitely. Additionally, every five

years EPA is required to take a deeper look at the site and do a regulatory review to collect more data to ensure the site is still protected. Mr. Allevo noted he is also on the “Call Before You Dig” list, so anytime anything is proposed near the property he will get a phone call, and will go out to determine if anything will be done anywhere near a cap, including utilities. Ms. Coleman stated the Town also has properties such as this one flagged in their internal permitting system, so if there was ever an application for any sort of activity on the property, the Health Dept. would be notified and would ascertain DEEP and EPA were informed so the work would be done safely, if it is done at all.

- Would that include surrounding properties as well? Per Ms. Coleman, it would not necessarily include them, but properties that have Environmental Land Use restrictions on them would, or properties that have the material underneath. Because that material is under homes that border Blakeman Place, it is flagged for street work. Additional sampling of the perimeter will be done to determine where that border is. Mr. DiLorenzo reiterated approximately 500 properties were sampled across Stratford, many of which include the properties along Blakeman Place, Meadow Street, the stretch of East Broadway that abuts MF, and Harrison Court. They will look at that historic data, and supplement it by looking at new data to ascertain there is a clean buffer between the back of the residential properties and where the cap is constructed. If they have to chase waste onto some of the residential properties they will do so to ensure they get it all, and will work with the individual property owners if needed. Ms. Coleman stated residents can call her (203-385-4090) or email [AColeman@townofstratford.com](mailto:AColeman@townofstratford.com) to determine what testing if any was done for the property.
- How will residents be updated with the status of the cleanup? Ms. Coleman stated they will reach out to residents via flyers for any updates that are specific to MF. You can also send her an email if you would like to be added to a distribution list for the whole cleanup. There is also a Raymark Community Advisory Group meeting every other month, which anyone can attend and will provide a broader perspective of the overall project. The next meeting is Nov. 30 at 6:30pm. It will be hybrid so you can join via GoToMeeting or in-person at the EPA office (300 Ferry Blvd). Ms. Boissevain noted residents can go to the Town website [www.stratfordct.gov/Raymark](http://www.stratfordct.gov/Raymark). It is a wealth of information from history dating back thirty years to more recent information, including meetings such as this one. Dr. DiLorenzo stated the EPA does maintain an office at 300 Ferry Blvd. and residents are welcome to come in at any time to talk. They will also plan additional meetings for the MF neighborhood, probably when they are halfway through the design process. In addition to the Community Advisory Group meetings, there will be additional meetings for MF residents midway through the design and toward the end of the design, and more frequently if needed.
- In a worst case scenario, if particles manage to get in the air, what impact would it have on an open pool or other activities? Mr. DiLorenzo stated they will do everything possible to ensure that does not happen with the air monitoring. In the worst case scenario, the risks they are talking about are chronic long term exposures added over a long duration, such as a 30-year period. Ms. Coleman stated the level they use for lead is generally used for a 90-day period, and they are using it for an individual day, so the numbers they have set are very protective.
- Historically, how have the developed Superfund sites affected the prices of homes in the area? Mr. DiLorenzo noted this is a very subjective question that is frequently asked.



Real estate continues to be sold around the sites, but the financial impact is very subjective. Ms. Coleman added that having a protective control on a property is much better than having a property that has not yet been addressed. Once a site is covered and capped, it should improve property values.

- Why did it take so long to address this problem? Mr. DiLorenzo explained there have been many discussions over the years regarding the Superfund cleanups as decisions are made from input by various stakeholders. They did try for a long time to work with a private developer who was interested in developing the site for future use as well as for the Town. It was a combination of factors that have caused it to take while. They are dedicated now to moving forward with this and getting it done as soon as possible.
- Will there be an impact to the flood maps for the area? Mr. DiLorenzo stated there will be no impact to what is now the 100-year flood plain. They will be changing the elevation of the site, but it is in a coastal flood plain. This means that by building up one small area, you are not going to offset it and flood someone else. Because they are going to maintain adequate drainage so they do not cause runoff, the FEMA flood maps will not change.
- Is there an opportunity to introduce rain gardens onsite or other stormwater systems to further monitor the runoff and collect data for future reference? Also enhancing the site with vegetation and natural habitat for wildlife? Mr. DiLorenzo reiterated how the site gets used is a local decision, but certainly any greenspace is a good idea. Ms. Coleman stated vegetation and natural habitat for wildlife could be incorporated into the design as well.
- There is a building on East Broadway that used to be a bait and tackle shop, and it is in the project area. Will this building be removed? Mr. DiLorenzo stated the building is dilapidated and unsafe, and will be removed as soon as possible.
- Is the project fully funded? Per Mr. DiLorenzo, the design is fully funded. Once the design is complete, they will have to secure funding for the actual cleanup, but they do not anticipate a problem doing so. It will, however, take some time and they cannot apply for that funding until the design is complete.
- Councilman Bill O'Brien asked if the Town decides to use the site for recreational purposes and puts in some fields, is artificial turf an option, or is natural grass preferable? Mr. DiLorenzo stated either would be acceptable.
- If the decision is made to use artificial turf, does that affect your capping design? Mr. DiLorenzo stated they would want to know upfront if the Town was planning to use artificial turf, but that would not have a direct impact on the overall design of the cap, as the drainage layer happens below ground. Mr. O'Brien thanked everyone for an excellent presentation.

#### VIII. ADJOURNMENT

As an aside, Ms. Coleman explained the Town's Plan of Conservation and Development (POCD) is its land use guide for managing growth and conserving resources. Residents can learn more and provide input at [www.planstratford.com](http://www.planstratford.com). Ms. Coleman adjourned the session at 8:02pm.

Respectfully submitted,  
*Aileen Marsh*  
Recording Secretary