

FINAL REPORT
Raymark Advisory Committee
Section III: Recommendations
Operable Unit 6 (OU6)
September 4, 2007

The Raymark Advisory Committee (RAC) offers the following recommendations for Town Council consideration regarding the remediation of Operable Unit 6 (OU6) and related properties.

I. Institute and Guarantee Strong Construction Health and Safety Controls during any kind of Remediation, regardless of the Remediation Selected

The Raymark Advisory Committee (RAC) recommends the Stratford Town Council adopt the following minimum requirements for the EPA and construction contractors to follow during the cleanup of Raymark waste in the town, regardless of the remediation approach ultimately taken. Requirements for health & safety should be the primary concern. Additional courtesy practices (listed below) include what is needed to maintain the quality of life for Stratford residents located in neighborhoods that abut the locations of remedial activities. Please note that these lists may not be all-inclusive, so the Town should make clear that further requests/restrictions might be needed as work commences and progresses.

Health & Safety: These issues deal with the proximity of residents to remedial activities, the duration of their exposure to cleanup, and the monitoring of the cleanup. These issues should be explicitly addressed in the Health and Safety Plan (HASP) prepared as part of the Remedial Action Work Plan.

- Remediation construction (excavating, consolidating, and/or dumping of waste) shall take place no closer than 20 feet (this may be increased) from any property line. This will be the closest distance residents can come without safety gear (Hazmat suits, respiratory etc.).
- Vertical barriers are to be erected during construction to help contain any airborne material. The barriers should be similar to noise abatement barriers used along highways.
- Airborne particulates at all construction sites (e.g., excavation and, if used, consolidation sites) are to be sampled and tested in as close to real time as current technology will allow. An independent lab will perform the monitoring and will report to the Health Department of Stratford. The monitoring should include, at a minimum, PM10, PM2.5, asbestos, polychlorinated biphenyls, and lead. Samples should be collected from a minimum of one upgradient and two downgradient locations selected daily based upon prevailing wind directions on that date. The selection of locations should be confirmed at midday to address possible changes in wind direction. Summaries of testing reports are to be given to the Stratford Health

Department at least weekly. Any elevated levels of dust are to be immediately reported to the Heath Department. The independent lab is to retain the test data for a minimum of 7 years.

Site Management: These requirements address the manner in which on-site activities will protect the residents from the adverse impacts of remedial activities. They should be explicitly addressed in the Site Management Plan (SMP) prepared as part of the Remedial Action Work Plan.

- To minimize remedial construction impacts, an independent ,“third party,” on-site contractor (who is paid for by the USEPA and selected by and accountable to the Town) will monitor remedial actions, as agreed to in the September 2003 Consensus Document among the RAC, Town, USEPA, and CTDEP.
- Limit the time of construction at any one property or site to a maximum of two (2) consecutive years. There should be a firm schedule from start to completion on any given site, subject to the 2-year maximum.
- Funds are to be escrowed and/or bonded to ensure closure of remediation at each property/site. If it is started, it must be fully funded, finished and not remain open indefinitely.
- Limit time of operation to 12 hours a day maximum. e.g. 7:00 AM to 7:00 PM, six days per week (no operations on Sundays).
- All construction sites shall use (amended) water to spray on sites to keep dust levels down. Runoff should be contained on the sites to prevent migration of hazardous materials off site. Collected fluids are to be transferred to appropriately licensed treatment and disposal facilities.
- Dump truck bed covers shall fully cover the truck beds and shall not have holes or gaps that allow Raymark waste to be released from the trucks in transit. Truck decontamination stations shall be constructed at both the excavation and consolidation sites to remove dust and Raymark waste from the outside of the truck bodies and the wheels prior to departure of trucks from the sites. Contaminated fluids shall be collected for proper off-site (i.e., out of Town) treatment and disposal at appropriately licensed facilities
- Police details shall be in place at all major intersections that are not signal-controlled to manage traffic safety issues (these details should be paid for with remediation funds).
- The remedial contractor shall use only diesel equipment retrofitted to reduce air emissions and shall use ultra low sulfur fuel to reduce harmful air emissions during construction. Vehicle operation on the construction (e.g., excavation and consolidation) sites shall comply with USEPA and CTDEP regulatory limitations on idling.
- Access to Short Beach Park and the beaches shall be maintained through the period of Short Beach Park remediation and OU-9 closure.
- Opening of any fire hydrant for any purpose shall be done in accordance with the Town policies and ordinances.
- The remediation contractor shall adhere to Town restrictions on noise and light pollution, and the Town shall monitor compliance during construction.

- Stratford Fire, Police, Planning & Zoning should be part of the overall remediation process.
- Failure of the construction contractor to comply with any of these requirements shall result in the shutdown of construction operations until such time the contractor can meet set requirements. Contractor shall not be compensated during a shutdown period resulting from failure to comply with these requirements.
- Assuming that existing waste is capped in place for OU4 and OU9, at some point, ensure that:
 - Design and construction of storm water drainage for the OU-4 remediation site shall include drainage improvements in the East Main Street and Frog Pond Lane area of the town.
 - Construction activities are managed to minimize impacts to the playing fields and Short Beach Park adjacent to OU9.

Communications and Courtesy Practices: These issues deal with maintaining the quality of life for residents adjacent to the remedial construction areas. They should be explicitly addressed in the Community Relations Support Plan (CRSP) prepared as part of the Remedial Action Work Plan

- Final uses for remedial sites, wherever possible, are to be established prior to remediation activities. Both the EPA and the SRI proposed that the Ball Field (OU4) become a town recreational area. The Landfill area (part of OU9) should also become a town recreation area. This will help break the stigma of the sites, as well as restoring property values to the abutting properties and area in general.
- A list of project managers and contact people is to be given to residents and Town government officials. Use leaflets and posted telephone numbers for easy access. Consider a hot line for residents to call to report any issues.
- The US EPA and its remedial contractor(s) shall hold neighborhood meetings at least once a month during construction, more often if conditions warrant it or as required by residents/town.
- Property owners should be notified of construction activities as early as possible to provide business owners time to make adjustments to their operations prior to work starting.
- Residents should be notified of work close to or adjacent to their homes prior to action and provided simple means to reduce their potential exposure such as closing windows, etc.

II. Ensure that State and Federal Governments bear Operations and Maintenance Costs

The RAC strongly believes that any short-term (1 to 3 years) and long-term (3 years or longer) costs for operations and maintenance of Superfund remedies on any property must be borne by the federal and/or state government. The Raymark waste problem is a town-wide problem caused by parties who selected to avoid responsibility for its action. The Town as a whole bears the burden of this unfortunate legacy. This is not the fault of any current property owner. Furthermore, the groundwater problem

(OU2) affects the entire Town and groundwater cannot simply be easily “parsed” out by property (whereas soil impacts, the RAC acknowledges, can be delineated within property lines). Consequently, the State and/or Federal government must assume operations and maintenance responsibilities for any remediation, including monitoring of caps, repair of caps, and on-going groundwater monitoring. If necessary, the State and Federal government should transfer monies from the special account to a Town “trust fund” or escrow account that would allow the Town to take over monitoring, enforcement of land use controls, and operations and maintenance of remedies, as long as that trust fund provided the full cost to the Town for doing so. The Town also needs the financial support to include OU6 and other properties in the Town-wide database for tracking all these sites indefinitely. Because the Governor has emphasized the need to develop brownfields before “greenfields,” the Town should insist that the state government, beyond its environmental regulator, engage in this process to secure additional means of financing and resources.

III. Do Not Consolidate in Town at this Time

The RAC, as a whole, cannot support consolidation (dumping) of waste in Town at this time. Individual RAC members hold a range of views. Several members are adamantly opposed to any consolidation ever. Others want certain questions and issues resolved first. Some members might be able to live with limited consolidation if construction health and safety construction practices could be guaranteed (and EPA’s past construction performance/oversight on OU-1 has not given them confidence that such best practices will be faithfully carried out). Some property owners prefer waste removed from their property to reduce/eliminate liability, potential O&M costs, and land use restrictions.

The RAC notes that removing waste from commercial properties could free those landowners of the various burdens of toxic waste and help ensure that those properties return to their most beneficial economic uses, with related increases in tax revenues (though the RAC notes landowners still might be left with the burdens of non-Superfund waste). According to EPA cost estimates, consolidation within Town would allow more properties to be remediated with existing Raymark funds, given the high cost of out-of-Town disposal. The RAC also notes that capping waste on site can return the property to beneficial use, with some restrictions, and can reduce or eliminates the amount of waste that needs to be hauled off-site. Most importantly, the RAC notes that consolidation in Town poses numerous health and safety risks from airborne dust (including potential asbestos exposure during construction, which risk has never been quantitatively estimated) to traffic safety issues (with so many trucks moving through Town, one or more traffic/pedestrian accidents are likely) to quality of life concerns (i.e., traffic, noise, and light impacts). The RAC understands that many residents living immediately adjacent to the identified potential consolidation sites (OU4 and OU9) are strongly opposed to consolidation in or near their neighborhoods. Given the RAC’s strong concern about health and safety of residents, the unquantified risks of digging and hauling waste throughout Town, the low- to no-risk of current waste in place, and the RAC’s strong concern about EPA’s past construction performance, the RAC cannot

support consolidation at this time.

IV. Do Cap and Redevelop Operable Unit 4 (OU4) the Ballfield

The RAC does support capping the existing waste on the ballfield as soon as possible and returning that site to beneficial use. Design and construction of storm water drainage for the OU-4 capping in-place remedy shall include drainage improvements in the East Main Street and Frog Pond Lane area of the town. Redevelopment and land use planning for this property should be done in close conjunction with adjacent neighborhoods to ensure future land uses that increase the quality of life in Stratford, maintain or increase adjacent property values, and provide for safe activities on this historically contaminated site. Property ownership/title issues must also be addressed on this property. Given that Short Beach Park has been recently developed and OU9 is posing no immediate health risk and needs to be capped as a landfill as whole, the RAC recommends waiting on specific action on this site at this time. When and if remediation occurs at OU9, construction activities should be managed to minimize impacts to the playing fields and Short Beach Park adjacent to OU9. Any work should adhere to the Short Beach Park Commission's long-term master plan for the site.

V. Remediate Prioritized OU6 Properties as Soon as Possible

The RAC has determined that the following properties can be remediated as soon as possible. They are listed in order of importance for remediation from first, to second, and so forth. The property, remediation option, and rationale are stated below.

- *Third Avenue Property.* This is the only occupied residential property included in OU6 and, thus, should be cleaned up through removal of the waste, and that waste should be transported out-of-town to an appropriate, licensed facility. Residents' health and safety must be protected first and residents should also be first to be relieved of the economic taint of Superfund. The estimated volume of waste is 630 cubic yards (CY) and the life-cycle cost for out-of-Town disposal is estimated at some \$600K.
- *Lot behind 326 Ferry Boulevard and the Vacant Housatonic Avenue property.* Both of these properties are vacant, overgrown, and directly adjacent to residential neighborhoods. Children have been seen playing in these areas where direct exposure to Raymark waste is possible. Human health risks at these properties are relatively high in comparison to other OU-6 properties. At the same time, these sites have a total estimated volume of waste of almost 9,000 cubic yards (CY), which is extensive, and the long-term remediation of these properties is best done in conjunction with the Ferry Creek cleanup (OU3) at some future point. Thus, EPA should immediately take measures to fence off and otherwise prevent exposure in the short and medium term until they can be fully remediated in conjunction with Ferry Creek. This cost has not been estimated to the RAC's knowledge, but is likely in the low 100K \$ range.

- *Wooster Park Property.* This is a Town-owned property and park and should be remediated by removal of the waste, and that waste should be transported out-of-town to an appropriate, licensed facility. Due to potential exposures of children to contaminants and the desire to restore the Park to neighborhood use, this site should be remediated third. The estimated volume of waste is some 1,500 CY and the life-cycle cost for out-of-Town disposal is estimated at some \$1.3 million.
- *576 and 600 East Broadway.* These two commercial properties are currently undeveloped. They have a substantial volume of waste (an estimated 15,000 CY), and the properties would provide an opportunity for economic development and tax revenues to the Town. This site should be remediated with all its waste remaining on site. Waste should be consolidated under proposed structures to render the waste environmentally isolated. The remediation should be closely coordinated with the property owner to ensure that proposed development designs will isolate necessary waste volumes and to ensure quick redevelopment. Further, the remedial activities should be coordinated with the abutting neighborhoods to ensure health and safety during this on-site construction. Any waste that may have to be removed from the property should be transported out of Town to an appropriate, licensed landfill. This particular solution has not been fully costed out, as the RAC understands it, but the remedial cost could range from as little as \$400K (federal dollars go primarily to consolidating waste for a building to be built upon it which is in turn funded by the property owner or developer) to several million (if some kind of additional capping is needed).
- *380 East Main Street.* This commercial property has a very limited volume of waste (25 CY). Because of this small amount of waste and to free this property owner from the taint of Superfund, this property should be cleaned up through removal of the waste, and that waste should be transported out-of-town to an appropriate, licensed facility. The life-cycle cost for out-of-Town disposal is estimated at some \$220K.
- *200 and 326 Ferry Boulevard.* These two commercial properties have limited volumes of waste, approximately 400 CY and 500 CY, respectively. Because of this relatively small amount of waste and to free these property owners from the taint of Superfund, these properties should be cleaned up through removal of the waste, and that waste should be transported out-of-town to an appropriate, licensed facility. The life-cycle cost for out-of-Town disposal is estimated at some \$460K and \$600K respectively.
- *Beacon Point Area of Concern 2.* The RAC notes that because all the waste identified on this property is located below the water table, active remediation will not be required. Some kind of land use controls will be needed. This property could likely be remediated without generation of Raymark Waste. This property is Town-owned.

VI. Some Properties Should be Remediated Last

The RAC has determined that the following properties should be remediated last of all of the Operable Unit 6 (OU6) properties. At least some properties will have to be remediated after Special Accounts have been depleted given the current limitations of funds in the Special Account (about \$21 million) and because EPA will require the site/project to spend down all Special Account monies before applying for additional monies for cleanup. Thus, the following properties are suggested for “hold” or “last in line” and are listed in order from lowest to greater remediation priority. The properties, nature of recommended action, and rationale for priority are discussed in the items that follow.

- *Airport Property.* This property is vacant, providing FAA-mandated runway safety for the Airport, currently does not pose an immediate health risk, can be managed for access to and use of the property by the Airport to reduce any long-term risk, and does not offer commercial, taxable, or redevelopment potential. It is clear that the waste on this site can be consolidated on site, a retention basin created to replace any lost flood storage, and the waste capped in place. The RAC recommends this strategy for remediation when long term funding for site activities is secured.
- *Vacant DOT Lot Abutting I-95 Property and Connecticut Right-of-Way Property.* Both of these properties are vacant lots, do not pose an immediate health risk, can be managed for access to and use of the property by their government owners to reduce any long-term risk, and do not have commercial, taxable, or redevelopment potential. Thus, the RAC recommends that remediation of these properties be deferred.
- *Beacon Point Areas of Concern 1 and 3.* Both of these properties do not pose an immediate health risk. The Town-owned parcel has been recently re-paved and, in effect, has a “temporary” cap on it preventing direct contact with Raymark waste. Because it does not pose an immediate health risk, has not tainted a private owner with the Superfund economic stigma, and can be managed for access to and use of the property by the Town government to effectively mitigate long-term risk, remediation of this property should be deferred.
- *DPW Lot Areas of Concern 1 & 2.* Both of these areas do not pose immediate health risks. These Town-owned parcels are already paved, preventing direct contact with Raymark waste with an effective temporary cap. Because these parcels do not pose an immediate health risk, have not tainted a private owner with the Superfund economic stigma, and can be managed for access to and use of the property by the Town government to effectively mitigate long-term risk, remediation of these parcels should be deferred. If the Town needs to do improvements at this site, DEP and EPA should work closely with the Town to ensure needed construction can take place and will take place safely. Please also note that the RAC has asked USEPA to separate the private property located at 251 East Main Street from this property group. Although the Raymark waste may be contiguous across properties, 251 East

Main Street is a private, commercial property and should be considered separately given the Superfund economic impact/stigma to the property owner.

VII. Some Properties with larger amounts of waste should be Remediated but Pose Significant Challenges due to Raymark Waste Volume on-site

The RAC would like to see the following commercial properties remediated as soon as possible and returned to the Town tax rolls (in many cases), ensuring viable commercial activity on these sites, and freeing private property owners, in most cases small businesspersons, from the economic impact and taint of Superfund. However, each of these properties contains over 1,000 CY or more of Raymark waste, and these volumes make the cost of disposing it out of Town particularly expensive. Because the cost of out-of-Town disposal is volume-dependent, greater volumes translate directly to greater costs. Furthermore, because the RAC opposes in-Town consolidation, the remedial choices for addressing these properties while preventing unacceptable health, safety and quality of life impacts to Stratford (neighborhoods near consolidation, construction and truck routes) remains challenging.

Generally, the RAC strongly encourages the agencies to explore with the Town and others how to make capping in place more viable for these properties with greater amounts of waste. Issues to consider include: 1) covering O&M costs (see above); 2) reducing the amount of waste that needs to be removed off-site to the greatest extent possible; 3) reducing the amount of clean fill needed for new caps to the greatest extent possible; 4) finding ways to minimize impacts on properties during construction; 5) finding a way to jointly and locally monitor caps over the longer term. More specifically, please note the following.

- *251 East Main Street.* This property is currently in use and is economically viable. However, the RAC would still like to see the property owner freed of the taint of Superfund. The RAC also recommends prioritizing this property before the DPW AOCs because it is a privately held, commercial property. The estimated waste on this property alone is approximately 1,100 CY. The life-cycle cost for out-of-Town disposal was not separated from the DPW lots' estimates, but is assumed to be, given the amount of waste, around \$1 million.
- *230 to 300 Ferry Boulevard Properties.* These properties are currently economically viable and they have significant redevelopment potential for the Town's benefit. However, each property owner still bears the taint of Superfund and some of these property owners have been unable to pay Town property taxes due to the inability to lend or borrow on these properties due to their designation in a Superfund Site. While the RAC would like to see these properties remediated, they contain a very large amount of waste (estimated at 38,000 CY of waste, the most of any property group identified in the FS). If only two feet of waste were to be removed out of Town to construct on-site caps on these properties (necessary to address floodplain storage and property usability issues), approximately 16,000 to 18,000 CY of waste

would still have to be moved through Town via truck. This transportation activity would pose potential airborne dust issues, as well as truck traffic dangers and general quality of life impacts to the Town. Given the large and contiguous amount of Raymark waste on these properties, capping in place is the most desirable alternative among limited choices. However, if waste is left in place, the owners might have to bear substantial long-term operations and maintenance (O&M) costs (see RAC recommendation above on the O&M issue) in addition to land use controls (disallowing routine activities that would disturb the cap; requirements to obtain permission from CTDEP for actions that might affect the cap, etc.). Accordingly, the RAC would like the USEPA to cap these properties in place, only if the property owners can be released from any operations and maintenance costs, if the total volume of waste that has to be removed off-site to establish that cap can be minimized, and if the remainder is disposed of out of Town. The estimated cost of capping these properties is \$5 million. However, this does not include the cost if waste has to be removed off that property to ensure a two-foot layer of clean fill for cap stability. Thus, the RAC recommends that the EPA re-analyze this property in more detail to find a cap-in-place remedy where most waste can be capped on site rather than hauled off site, and where the cap can be re-engineered to allow for a smaller depth of compacted base, given the expense of out-of-Town disposal.

- *Lockwood Avenue.* This property offers potentially high redevelopment opportunity for the Town's benefit in terms of economic activity on the waterfront and property taxes that would be collected. However, it also has significant wetlands and floodplain regulatory constraints that could make it difficult to redevelop. The property also has a substantial volume of waste to move off the property (estimated at 13,700 CY). The property owner (and RAC member) has a strong desire to see this property redeveloped. The USEPA and CTDEP must work closely with the landowner to consider a remediation/redevelopment plan that manages the waste on-site, replaces floodplains and wetlands if needed, and ensures that this valuable piece of property can be used for its greatest and best economic value. As one possibility, it may be (like 576 and 600 Broadway) that a redevelopment plan could allow for waste to be placed under a new building's footprint.
- *250 to 340 East Main Street.* These properties are currently economically viable but must also bear the burden of Superfund stigma. The total estimated waste volume on these sites is approximately 3,200 CY. Capping in place on these sites would make long-term management difficult for both private property owners and the CTDEP. However, if the waste is removed, its cost for out-of-Town disposal is high given the volume.

VIII. Finalize Review of Two Additional Identified Potential Consolidation Sites

As noted above, the RAC does not recommend consolidation at this time. However, there are two additional potential consolidation sites, (Ferry Creek (OU3) and the Army Engine Plant) that, in the RAC's view, have not been fully analyzed. The RAC believes that these sites are not likely to be practical for consolidation for a variety of reasons, but that their analysis is not complete (as in the other two sites – OU4 and OU9). The RAC recommends some limited further analysis, while ensuring excessive monies are not spent on this analysis to avoid expending already very limited Raymark Special Account dollars.

- *Ferry Creek (OU3)*. This concept has been preliminarily analyzed in the FS and might hold some amount of consolidated waste (approximately 29,000 CY). However, the analysis is incomplete in the RAC's view. There are significant regulatory and technical issues related to this site, including flood storage and wetlands impacts, as well as geotechnical limitations of the underlying soil and sediment and exposure issues related to the site's proximity to an abutting residential neighborhood. However, the USEPA promised but has not provided a more detailed analysis of this site to determine if it is at all viable as a consolidation site. It is attractive because consolidating the waste from the Ferry Boulevard properties in Ferry Creek while concurrently remediating Ferry Creek would eliminate the need for major truck traffic and associated risks throughout the rest of Town (though this would pose construction concerns for the abutting neighborhood). If done in conjunction with OUs 7 and 8, a portion of Stratford's waterfront then might be returned to economic development and beneficial use.
- *Army Engine Plant*. The Army Engine Plant (AEP) was not included in the FS. It might be a more preferable consolidation site because it is a large parcel, relatively distance from neighborhoods, has good access, and is relatively close to most of the OU6 properties with larger volumes of waste, thus might help reduce overall truck traffic due to remediation. It is the RAC's understanding that this site was not considered because Raymark Waste was not found on the site and thus was not included within the Superfund site. As a result, hazardous waste generated from the Raymark Site, by federal law, cannot be moved onto that property. Furthermore, the AEP is owned by the Army, and the Army wishes to sell and relieve itself of the property and would likely not want anything to impinge upon that transaction. If a private property owner took on the site for redevelopment, they would likely have their own remediation challenges regardless on that site. And lastly, if this site was used for consolidation, one would have to work with the Army and its own particular rules, regulations, bureaucracy, and management. The RAC recommends that the agencies do hold a meeting with Town, State, and Federal elected officials to discuss this potential consolidation site one more time. Furthermore, the EPA should confirm in writing that it has reviewed the extensive monitoring data from the Army Engine plant and that Raymark waste has not been identified on this property.

IX. Further Clarify Certain Legal and Property Ownership Issues related to the Site

The RAC has identified a number of legal and ownership issues that remain outstanding (the RAC can provide these in writing to the Town Attorney). For example, if consolidation is used (over RAC's current objections), it is not clear who will own the OU4 site. Although the property is currently in private ownership, it is likely to have to revert to some other entity both during remediation and afterward. It is not clear what entity will control it during construction and thereafter who will bear the cost and liability for long-term O&M. It is not clear what liability implications there may be for commercial properties who have a remedy described in a ROD but may not have action for many years due to funding constraints. A full range of RAC questions raised on these issues is available in past RAC meeting summaries, as needed. These questions ought to be answered in, or at the same time, as the release of the Proposed Plan.

X. Provide an On-Going Forum and Means for Town and Citizen Engagement going Forward

The Town, USEPA, and the State should ensure a means for citizens, neighbors, businesses, and the interested public to stay abreast of and influence the cleanup decisions and actions as they proceed. With renewed interest in the cleanup due to the impending decision on the OU6 cleanup, there are many motivated citizens who want to learn, understand, and influence the decisions going forward. The Town and its citizens should be allowed meaningful, on-going opportunities to comment on and shape proposed remedial designs and proposed implementation plans. RAC members are willing to continue to meet and be helpful, as and if needed.

XI. Develop a Town-Wide Master Schedule for Construction of Various Projects

Stratford will face numerous construction projects likely to affect quality of life in the coming years, from Superfund remediation to the Wheeler Moses bridge reconstruction to redevelopment of private properties. If these projects are not coordinated effectively, truck and other traffic, and their associated impacts, may be intolerable. Thus, the Town should work with all relevant agencies to develop a master schedule of activities and ensure coordination among diverse projects and delaying or speeding up of work as necessary.

XII. Clarify the Future of Superfund in Stratford after the Special Account Dollars are Spent

There is little to no clarity about what happens once the Raymark Special Account funds of some \$21million are spent down, whatever the final remediation. Some properties will remain unremediated, no matter what solution the EPA pursues, and several other operable units (OU3, 7, and 8 and likely OU9) won't be remediated either – what then will happen to such properties? It is the RAC's understanding that the national Superfund is highly underfunded, and it is unlikely that the Raymark site would receive

any additional dollars for remediation any time in the foreseeable future after the Raymark Special Account dollars are spent.

Thus, the EPA needs to provide the Town more clarity on the longer-term future of Superfund in Stratford. How long will it be before the properties not remediated in Phase I are remediated? What will be the interim liability for property owners? How is the continued stigma of Superfund likely to affect the Town's property values and quality of life? How diligently will EPA Region I work to obtain Superfund monies for final cleanup? These questions ought to be answered in, or at the same time, as the release of the Proposed Plan.