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**SUMMARY OF THE PUBLIC MEETING
ON THE
FEASIBILITY STUDY AND PROPOSED PLAN
FOR THE
YAWORSKI LAGOON SUPERFUND SITE**

July 27, 1988
Dr. Helen Baldwin School
45 Westminster Road (Route 14)
Canterbury, Connecticut

On July 27, 1988, the U.S. Environmental Protection Agency (EPA) held a public meeting in Canterbury, Connecticut to discuss the alternatives evaluated in the Yaworski Lagoon Superfund site Feasibility Study (FS) and to present the Proposed Plan for addressing contamination at the site. Approximately 50 people attended the meeting. EPA officials attending the meeting included Margaret Leshen, Superfund Section Chief; John Gallagher, EPA Remedial Project Manager; John Zannos, EPA Project Hydrogeologist; and Jeremy Firestone, EPA Project Counsel. A reporter from the Norwich Bulletin also was present at the meeting as well as several television and radio correspondents.

EPA conducted presentations that lasted for 40 minutes and were followed by a question and answer period that lasted for approximately 2 hours. There was a high level of interest in the subjects being discussed by members of the public present at this meeting. During the meeting, citizens expressed their frustration with the length of time that had passed since EPA had last been in Canterbury, as well as their dissatisfaction with EPA's preferred alternative for addressing contamination at the site. Citizens also expressed their concern that EPA had not sampled domestic drinking water wells.

This meeting summary is organized into three sections: Section I describes the presentations made by EPA; Section II summarizes the comments and questions received from the audience and EPA responses; and Section III outlines commitments made by EPA during the meeting.

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SECTION I. SUMMARY OF PRESENTATIONS

Margaret Leshen opened the meeting by introducing EPA staff present at the meeting. She noted that EPA's objective for the meeting was to discuss the FS and Proposed Plan, and that beginning July 28, 1988, EPA would hold a 28-day public comment period on the FS and Proposed Plan. She told the audience that EPA would return to Canterbury on August 17, 1988 to hold a public hearing and to accept oral comments on the FS and Proposed Plan. Finally, she asked that citizens hold their questions until the end of all of the presentations.

John Gallagher then presented a brief overview of the Superfund remedial action selection process, and explained the sequence of activities that will follow the selection of a cleanup remedy. He briefly reviewed the history of the Yaworski Superfund site, and described EPA's role at the site. Mr. Gallagher then described the results of the Remedial Investigation (RI) and Risk Assessment conducted by EPA and explained how the remedial alternatives considered for the Yaworski site were developed and evaluated in the Feasibility Study (FS). Finally, he briefly described each of the FS alternatives, including EPA's preferred alternative. The FS alternatives are listed below:

- (1) No-action;
- (2) No-action for the lagoon sludge with an alternate concentration limit (ACL) as the groundwater protection standard;
- (3) Improved cap and dike for lagoon sludge with an ACL as the groundwater protection standard (EPA'S PREFERRED ALTERNATIVE);
- (4) Improved cap and dike for lagoon sludge with groundwater treatment by ultraviolet/ozonation;
- (5) On-site incineration of excavated sludge with an ACL as the groundwater protection standard; and,
- (6) On-site incineration of excavated sludge with groundwater treatment by ultraviolet/ozonation.

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Following Mr. Gallagher's presentation, Ms. Leshen opened the meeting up to receive questions and comments from the audience.

II. COMMENTS AND RESPONSES

The questions and comments from the audience and the responses provided by EPA are summarized in the following categories.

- A. Questions Concerning the Reliability of the Improved Cap and Dike;
- B. Questions Concerning Groundwater Contamination and the Methodology of an Alternate Concentration Limit (ACL) Demonstration;
- C. Other Questions Concerning the Preferred Alternative;
- D. Questions Concerning Other Alternatives Considered in the FS;
- E. Questions Concerning Enforcement and Oversight; and,
- F. Other Comments.

A. Questions Concerning the Reliability of the Improved Cap and Dike

Comment:

Several commenters questioned EPA about the reliability of the improved cap and dike. One commenter remarked that a hurricane would wash the entire cap away, causing all the site contamination to become exposed. Residents wanted to know how long the cap would last. Finally, residents expressed concern that the cap would not address the contamination that is being left in the lagoon, and that this contamination would continue to cause groundwater contamination. One citizen argued that EPA's approach to cleaning up

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groundwater contamination contributed by the lagoon could be characterized as a strategy that advocates "dilution as the solution."

Response:

EPA responded that the cap is designed to last indefinitely and to withstand hurricanes. The cap will be monitored continuously by the State, which will be responsible for operation and maintenance. EPA pointed out that after periods of heavy rainfall, EPA or the State will inspect the cap to ensure that it is in good condition. EPA added that contaminants will continue to seep into the groundwater below the lagoon, but emphasized that the groundwater discharges to the Quinebaug River where the contaminants are quickly diluted. EPA agreed that its preferred alternative does include dilution as one of the factors that will contribute to meeting cleanup goals for the site. EPA explained that when contamination enters the groundwater and flows into the river, the contamination naturally degrades. However, EPA noted that the improved cap would greatly minimize the amount of contamination that can flow into the lagoon and spread contamination into the groundwater and subsequently into the river.

Comment:

One commenter asked about the materials to be used to construct the impermeable layer of the cap and the thickness of the impermeable layer.

Response:

EPA responded that the impermeable layer of the cap will be made of clay or plastic. The exact specifications of the design of the impermeable layer will be developed during the design phase of the remedial action. If EPA selects the improved cap to address site contamination, the agency will outline

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standards and performance criteria for the cap in the Record of Decision, EPA's final decision document that designates the remedial action to be used at the site. These standards then would be used for designing the cap. The entire cap could range from four to eight feet in thickness.

Comment:

One commenter asked if the cap is impermeable to gases.

Response:

EPA noted that if the impermeable layer is made of plastic, gases would not be able to pass through it. If plastic is used, vents would be inserted through the cap. This would allow gases from within the lagoon to escape, and would prevent pressure from building up underneath the cap and causing deformities in the cap. EPA would monitor the emissions from the vents.

Comment:

One commenter asked if EPA has installed a cap similar to that proposed for the Yaworski site for any other site that is located in a floodplain. The commenter stressed that most people are concerned about the effect of rainfall on the cap.

Response:

EPA told the audience that the cap will be designed specifically for the site, taking into consideration the fact that the site is in a one-hundred year floodplain. EPA explained that the agency has 24-hour per day access to the Federal Emergency Management Agency (FEMA), which is the agency that would respond immediately in the event of an emergency at the site.

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B. Questions Concerning Groundwater Contamination and the Methodology of an Alternate Concentration Limit (ACL) Demonstration

Comment:

Many residents expressed concern about whether contamination from the Yaworski site may have affected their drinking water wells. One commenter insisted that when EPA had been present for a public meeting two years ago, agency representatives told citizens that contamination from the site could not affect residential wells. Residents expressed confusion and anger over EPA's groundwater sampling method, and wanted to know why domestic wells still had not been tested. Residents wanted to know if EPA could determine how far from the site contamination had spread, and whether EPA has identified a geographic point beyond which contamination has not migrated. Finally, residents asked if EPA could pursue the question of whether domestic wells could be sampled, and have an answer by the upcoming public hearing (August 17, 1988). Several citizens stated that EPA has many resources, and that the agency could easily cover the costs of testing the 16 residential wells in question. One citizen complained that the State told him that he cannot receive free bottled water, even though he has data from a private testing company showing that his well is contaminated. After handing the data to an EPA representative, the resident wanted to know if EPA could pay for the costs of cleaning his well.

Response:

EPA explained that the methodology used to address groundwater contamination involves setting an alternate concentration limit (ACL) as the groundwater protection standard. EPA explained that the preferred alternative would involve restricting groundwater use in the area within the river meander

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(i.e., the land between the bend of the river), and also limiting groundwater use in a larger area around the lagoon. (EPA described this area to the audience using an overhead slide.) Groundwater would be monitored to detect any increase in contamination in these areas. If the alternate concentration limits were exceeded, EPA would take immediate action to pump the groundwater out of the ground and treat it in an on-site or off-site facility, or use a similar engineering solution.

EPA explained that there is an area around the lagoon that contains a number of monitoring wells and pointed out which wells had shown evidence of contamination. EPA explained that the evidence has convinced them that groundwater contamination has not migrated across the river, but instead is contained within the river meander. Therefore, EPA does not believe that contamination from the Yaworski Lagoon is detectable in domestic wells in the area. EPA told residents concerned about contamination in their wells that their wells are at a higher elevation than the Yaworski Lagoon and the Quinebaug River, and that groundwater does not flow up hill. EPA emphasized that it would take citizens' concerns into consideration, look at the data provided by one citizen who used a private testing company, and consider whether further sampling may be necessary. If EPA found that the Yaworski Lagoon were causing contamination of the domestic wells, then the cleanup of these wells would be paid for by the Superfund program.

Comment:

One citizen was interested to know the depth of the monitoring well that is farthest from the site on the opposite side of the river from the lagoon.

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Response:

EPA responded that the well is 80 to 150 feet deep.

Comment:

One commenter asked whether property owners in the vicinity of the site are going to be restricted from using their wells, or restricted from installing new wells within an area designated by EPA.

Response:

EPA will be working with the State and County to attempt to place restrictions on the use of the groundwater in areas where groundwater is contaminated.

C. Other Questions Concerning the Preferred Alternative

Comment:

One citizen expressed concern about whether EPA had completed a study of the birds, aquatic life, and small animals in the area of the site. She stated that she was concerned about the impact of contamination on the food chain.

Response:

EPA conducted a study of the wetlands area specifically designed to consider the impact of contamination on the wildlife, aquatic life, and vegetation in the wetlands. EPA did not have the results of the study at the meeting.

Comment:

One commenter asked whether EPA's preferred alternative takes into account the possibility of seismic activity. Another commenter assured EPA that there is a major fault located close to the lagoon, and asked how this would impact the

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site. Another commenter asked what would happen if there were an earthquake.

Response:

EPA responded that in this area of Connecticut, there is very little seismic activity. EPA responded that in the event of an earthquake, there might be more fracturing of the bedrock, but that this would not necessarily result in new pathways for migration of contaminants.

Comment:

One commenter asked if EPA receives the reports prepared by Fuss and O'Neill, a contractor for the State of Connecticut. According to the commenter, a recent report by Fuss and O'Neill indicates that the rate of leachate coming from the lagoon cap has increased in the last few months.

Response:

EPA noted that Fuss and O'Neill prepares these technical reports for the State. However, EPA stated that while changes (both upward and downward) for areas near the lagoon have been observed, the contamination levels have remained essentially the same.

Comment:

One commenter asked if EPA had conducted any fish tissue sampling, and whether EPA was aware that the State has a plan to restock the salmon in the Quinebaug River.

Response:

EPA responded that they had not conducted fish sampling and are aware of the State's plan.

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Comment:

One commenter asked if EPA had conducted any toxicity testing.

Response:

please insert response

D. Questions Concerning other Alternatives Considered in the FS

Comment:

One commenter stated that it seemed EPA had not carefully considered the alternatives involving excavation of the lagoon contents.

Response:

EPA responded that, in fact, the agency has a strong bias to choose alternatives that treat and destroy wastes. At the Yaworski site, EPA explained that the alternatives involving excavation and treatment by incineration appear to be too difficult to implement. Specifically, excavating the wastes from the lagoon could pose serious health risks to people in the area from exposure to the wastes. In addition, siting an incinerator at the Yaworski site would be difficult since the site lies in a one-hundred year floodplain and it is difficult to obtain permits to site a hazardous waste facility in a floodplain. Incineration of the wastes at the Yaworski site would cost approximately one-hundred million dollars. EPA stated that emissions from the incinerator stack also would have to be treated.

Comment:

One citizen asked why EPA could not consider off-site incineration as an

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option, given the fact that the Yaworski site is located in a one-hundred year floodplain.

Response:

EPA considered this option, but eliminated it early on because the national capacity for off-site incineration is very low. In addition, the problems associated with excavation would continue to exist, and the cost of the alternative would be comparable to on-site incineration.

D. Questions Concerning Enforcement and Oversight

Comment:

One commenter asked if the potentially responsible parties (PRPs) could choose Fuss and O'Neill as their contractor. She stressed that the community has had problems with Fuss and O'Neill's work in the past. She asked if the public could play a role in influencing the PRP's choice of a contractor.

Response:

After the Record of Decision is signed, EPA will send a letter to the PRPs asking them if they are willing to negotiate to undertake the site remediation. If the PRPs agree to negotiate with EPA, EPA will first determine if the PRPs and their contractor are suitable for conducting the work, and if so, only then will EPA enter into an agreement with the PRPs. If the PRPs do not agree to negotiate, EPA can sue them in court to compel them to enter into negotiations. After EPA has entered into an agreement with the PRPs, the agreement will go to court to be approved by a judge. At this point, there will be a public comment period and if members of the public are not happy with the agreement, or the choice of a contractor, they can comment

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at that point. EPA stressed that if the cleanup were to be conducted by the PRPs or their contractor, EPA would oversee every aspect of the cleanup.

Comment:

One commenter asked if the State would oversee the cleanup. She noted that the community does not feel comfortable with the State's opinions since the State thinks that the current vegetative cover is adequate. One resident also inquired as to why no one from the State was present at tonight's meeting.

Response:

EPA noted that it cannot speak for the State, but agreed to relay the concerns of the community to those at the State who are involved with the Yaworski site.

Comment:

One citizen asked if the revenues from the recent increase in tipping fees for the Yaworski solid waste dump (located next to the Yaworski Lagoon site) would be used for part of the lagoon cleanup.

Response:

EPA noted that the Yaworskis are considered a PRP, and that they may be forced to pay for part of the cleanup of the Yaworski Lagoon site. Therefore, any revenues from the landfill could be considered part of the Yaworskis' assets.

Comment:

One resident asked if all of the PRPs had been identified.

Response:

EPA responded that the agency has identified eight groups of PRPs: (1) The

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Yaworski's (2) InterRoyal Corporation (3) Kaman Aerospace Corporation
(4) Pervel Industries, Inc. (5) Triangle PWC, Inc. (6) Rogers Corporation
(7) C & M Corporation (8) Revere Textile Prints Corporation.

E. Other Comments

Solid Waste Landfill

Comment:

Several residents asked questions concerning the affects on the environment of the Yaworski solid waste landfill. They expressed concern that the dump is contributing to groundwater contamination. Citizens wondered whether EPA could pinpoint where the contamination from the landfill was headed and why the landfill is not considered to be as much of a problem as the lagoon. They asked if EPA had correlated any of their data on the landfill with that of the State, since the State is overseeing the operation of the landfill.

Response:

EPA has found that the Yaworski solid waste landfill is contributing to groundwater contamination in the area, but to a lesser extent than the lagoon. EPA emphasized that the landfill is being monitored by the State. EPA has found contamination in monitoring wells that they believe is originating from the landfill and not the lagoon, but they have not charted the flow of the contamination. EPA also stated that the agency has correlated some of its data with that of the State.

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Public Hearing

Comment:

One citizen who represented the Inland Wetlands Commission stated that he would like information on the intervenor process, and that he would like to be given intervenor status at the upcoming public hearing in order to present witnesses and to cross-examine EPA's witnesses.

Response:

EPA explained that the upcoming public hearing is not considered a formal hearing with testimony nor will there be a hearing officer present. The hearing will provide an opportunity for members of the public to present oral comments to EPA concerning the cleanup plan. If someone is interested in bringing an expert to make a statement concerning EPA's cleanup plan, that person can make a statement. The transcript of the hearing will become part of the Administrative Record, which is the compilation of material that the EPA Regional Administrator will use to make his decision concerning how to address contamination at the site. If the decision is brought to court, a judge will look at all of the information that is included in the Administrative Record, including the transcript of the hearing.

Ownership of the Property

Comment:

One commenter expressed concern about what would happen if the land switched ownership, and asked if EPA could assume ownership of the site property.

Response:

EPA explained that the agency can work with the State, County, and local governments to place deed restrictions on the site property so that if the

land were sold, access to the site would be controlled, and use of the groundwater would be prohibited. EPA could assume ownership of the land, but at this point the agency is not considering this as an option for the Yaworski property.

III. EPA Commitments for Future Activities

At the meeting, EPA made commitments to conduct the following activities:

- 1) To analyze the data presented to EPA by one citizen, and to report back to the citizen and the community regarding its findings;
- 2) To relay citizen's concerns to the State of Connecticut.

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