

November 17, 2017

Mr. Daniel Keefe, Chief
Office of Site Remediation & Restoration
U.S. Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Superfund Records Center

SITE: RaymarkBREAK: 11.9COUNT: 100000972

RE: Response to Request for Information Pursuant Section 104 CERCLA for Operable Unit 9 of the Raymark Industries Superfund Site and the Stratford Army Engine Plant

Mr. Keefe:

I am responding to EPA's September 11, 2017 Request for Information Pursuant to Section 104 of CERCLA for Operable Unit 9 of the Raymark Industries Superfund Site (which includes Short Beach Park and the former Stratford Landfill), and the Stratford Army Engine Plant located at 550 South [sic] Main Street, Stratford, Connecticut. I am responding on behalf of the Town of Stratford.

In general, within the Stratford Health Department we have records that pertain to the characterization of environmental contamination of all three sites of interest, the Landfill (LF), Short Beach Park (SBP), and Stratford Army Engine Plant (SAEP). These are mostly reports produced by your agency, various consultants, the CT Department of Energy and Environmental Protection (CTDEEP), and files/notes, etc. from my office participating in meetings, etc. over the years since 1991 when Raymark came to light.

Furthermore, the Town of Stratford did not own, nor operate the SAEP parcel at 550 South Main Street and would not have any records pertaining to disposal on that site. I would direct you to the former library located within the administrative building of the SAEP where many documents were previously archived.

If additional time is permitted, I can continue to scour any available archives. However, in the interest in meeting your deadline, I offer the following as our response:

1. General Information About Respondent

- a. Town of Stratford, 2725 Main Street, Stratford, CT 06615
- b. Andrea L. Boissevain, MPH, Director of Health
(aboissevain@townofstratford.com) and Alivia Coleman, Health Program



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Associate (acoleman@townofstratford.com), Stratford Health Department,
468 Birdseye Street, Stratford, CT 06615 203-385-4090

- c. Andrea L. Boissevain, MPH, Director of Health
(aboissevain@townofstratford.com) contact info above

2. Past Site Operations – 1930 to 1985
 - a. Refer to history and background – no records were found at this time.
3. Lease – This would require additional time to search historical records.
4. Contract or Site Managers – This would require additional time to search historical records (if they even exist).
5. Site Characteristics
 - a. Physical Layout and Characteristics of the Stratford landfill and Short Beach Park: I do not have specific knowledge of the Stratford Landfill, particularly for the time period 1930 to 1985, except for information presented in various EPA documents that were produced as part of the agency's remedial investigation (RI) conducted between 1993 and 2005. The same is true for Short Beach Park. The Stratford Health Department maintains EPA and CT Department of Energy and Environmental Protection (DEEP) documents issued regarding the Raymark Industries, Inc. Superfund site project, including Operable Unit 9.
6. Information regarding the Stratford Army Engine Plant (SAEP)
 - a. Any information that the Stratford Health Department has come from other agencies. For example, in 1999 there was a "Finding of Suitability to Lease" (FOSL) where then-Town manager Michael Feeney provided comments. Input for some of the comments made came from then-Health Director Elaine O'Keefe who received technical assistance from the CT Department of Public Health. The Stratford Health Department also participated in the SAEP Restoration Advisory Board (RAB) meetings, records of which we have some, but are probably stored in the library that was maintained at the 550 Main Street [former] administrative offices—to which we have no access. This was the area where the RAB met.
 - b. EPA is more than welcome to come to the Stratford Health Department and review any and all of our files pertaining to the SAEP.
7. Information About Others – We were provided the name and phone number of a person who served as the Project Coordinator for the SAEP LRA Rick Norris 203-448-4083. rnorris@groton-ct.gov. Another person who was very involved in the SAEP Base Realignment and Closure portion of the project was Fred Hyatt. I do not have any contact information for him.
8. Compliance with This Request
 - a. Sources reviewed/consulted in responding to this request

- i. John Casey (Town Engineer) current employee. Asked Mr. Casey if he had any records pertaining to the Stratford Landfill or Short Beach Park. He replied that while he had aerial photos and maps of the areas, he did not have, nor did his department historically collect or maintain records pertaining to entities that contributed to the landfill or Short Beach Park.
- ii. Gary Catalano (Highway and Sanitation Supervisor). Spoke with Mr. Catalano about the history of refuse disposal. He has been with the Town since 1971 and described that there were three people who worked at the LF who alternately drove the pay loader, road grader, and served as "gate keeper" to the LF. Any Stratford resident or business (with ID) could dump material in the LF, until around the mid-80's when it was closed to the public. After that, only yard waste was allowed by Town entities. When the LF closed, Town refuse was brought to the current facility for incineration only. Mr. Catalano said there were no records for the historical time frame of interest; additionally, he petitions that State every three years or so requesting permission to dispose of/destroy transfer station records.
- iii. Reviewed All Health Department records currently stored in seven 4-drawer filing cabinets located in the main office of the Stratford Health Department at 468 Birdseye Street as well as historical records stored in boxes (13 boxes and 1 bookcase) located in the basement of the Stratford Health Department at 468 Birdseye Street for all three units: LF, SBP and the SAEP. These records included files created by the former Health Director Elaine O'Keefe when she came to Stratford in 1991.
- iv. In the main office storage area, files were located regarding haulers who filed and paid for voucher books to haul refuse to the current Transfer Station dating back only as far as 1997. Currently the Health Department issues voucher books to haulers who bring refuse to the Stratford Transfer Station. The Transfer Station inspects vehicles and collects vouchers per each trip made to the Transfer Station. Review of such records revealed that the Health Department has voucher purchase records that date back to 1997.
- v. A subsequent review of Stratford Health Department Requests for Records Disposition did not indicate that prior records had been disposed or destroyed. An additional review of Records Disposal Requests did not yield disposal of hauler vouchers, so it is unclear

when the Stratford Health Department was assigned to serve as the issuing agency of haulers.

- vi. I went to Stratford Town Hall and went through a bookshelf in the basement of Town Hall (2725 Main Street, Stratford, CT) that contained several volumes of US Army Corps of Engineers Pre-Design Investigation Reports of the OU2 Groundwater NCRA from the SAEP (May 2000) along with the Final Environmental Baseline Survey Report (ABB Environmental Services, Inc. December 1999). These documents describe environmental conditions.

I have attempted to answer the above questions to the best of my ability. Please do not hesitate to contact me should you require clarification.

Sincerely,



Andrea L. Boissevain, MPH
Director of Health

cc: John Harkins, Mayor
Chris Tymniak, Chief Administrative Office
Bruce Jackson, Town Attorney
Chris Hodgson, Town Attorney