

**From:** Thomas Yemm <tyemm@earthlink.net>  
**Sent:** Monday, August 29, 2016 1:29 PM  
**To:** DiLorenzo, James  
**Subject:** Comment re EPA Proposed Plan for Raymark Industries, Inc., remediation at Stratford CT  
**Attachments:** Letter to EPA re Raymark 082916.pdf

Dear Jim—

Attached is the comment letter I put in the mail today. Text is below, as corrected.

Tom

Thomas Yemm  
746 Broad Street  
Stratford CT 06615

August 29, 2016

Jim Dilorenzo  
EPA Superfund Project Manager  
5 Post Office Square, Suite 100 (OSRR 07-4)  
Boston, MA 02109-3912

Dear Jim:

This is my written commentary on EPA's Proposed Plan regarding Raymark Industries, Inc. of Stratford. I attended one of the Open House Sessions, as well as the Formal Public Hearing, in July of this year.

At that July Public Hearing, I asked if EPA had any estimate for the incremental additional cost to transport all of the waste material that EPA proposes to consolidate at the Raymark ball field (OU 4), to out of town facilities. What I was told on July 26 was that EPA had estimated the cost of transporting all of the material it plans on removing from OUs 2, 3 & 6 would be \$274 million. Since the current cost estimate for the proposed plan is \$96 million, this means that EPA funding is short by \$158 million of the amount required to truck all of the currently proposed waste removal. Of course it is really a smaller figure, since a significant expense is for the capping etc., of the material at OU 4. Suffice it to say that EPA would require at least another \$100 million to remove all of this material. There is of course plenty of Raymark waste that is not even considered within this proposal, so I am leaving that off the table, so to speak, in my comments here.

Here is my reaction to the above, and my request to EPA as it considers whether, and how to go forward with the Raymark matter:

Begin with candor and humility about funding, capping and safety. This funding, while substantial, is less than half of what is required. Caps are temporary at best, and should not be presented as "solutions" to this problem. And safety requires adopting practices analogous to those employed in the nuclear power industry, where such as "dry cask storage" is temporary, until such time as better solutions come on line.

What follows logically from all of this is the following scenario, which I respectfully suggest that EPA adopt as a modification to its proposal. One: remove as much Raymark waste as current funding permits. Two:

consolidate the rest at a site not in the middle of a residential neighborhood, i.e. not at OU 4. Three: refrain from any trumpeting about “completion” of any Raymark remediation project, and begin immediately to request funding from (a new) Congress for the monies necessary to remove the remainder of the Raymark waste from the town of Stratford, forever.

Sincerely,

Thomas Yemm

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Thomas Yemm



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<p>File Type(s) attached: <input style="width: 350px;" type="text" value=".MSG"/></p> <p>Example: .jpg, .xls</p> <p>Description or Comments:</p> <div style="border: 1px solid black; height: 60px; width: 570px; margin-top: 10px;"></div>
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For any additional assistance please contact the EPA New England Office of Site  
Remediation and Restoration Records and Information Center  
617-918-1440