

Health Consultation

REVIEW OF THE DRAFT REMEDIAL INVESTIGATION, RAYMARK
OPERABLE UNIT 9, SHORT BEACH PARK AND STRATFORD
LANDFILL

RAYMARK INDUSTRIES SITE

CITY OF STRATFORD, FAIRFIELD COUNTY, CONNECTICUT

EPA FACILITY ID: CTD001186618

JULY 28, 2005

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Agency for Toxic Substances and Disease Registry
Division of Health Assessment and Consultation
Atlanta, Georgia 30333

Health Consultation: A Note of Explanation

An ATSDR health consultation is a verbal or written response from ATSDR to a specific request for information about health risks related to a specific site, a chemical release, or the presence of hazardous material. In order to prevent or mitigate exposures, a consultation may lead to specific actions, such as restricting use of or replacing water supplies; intensifying environmental sampling; restricting site access; or removing the contaminated material.

In addition, consultations may recommend additional public health actions, such as conducting health surveillance activities to evaluate exposure or trends in adverse health outcomes; conducting biological indicators of exposure studies to assess exposure; and providing health education for health care providers and community members. This concludes the health consultation process for this site, unless additional information is obtained by ATSDR which, in the Agency's opinion, indicates a need to revise or append the conclusions previously issued.

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HEALTH CONSULTATION

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UNIT 9, SHORT BEACH PARK AND STRATFORD LANDFILL

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Prepared by:

Connecticut Department of Public Health
Under Cooperative Agreement with the
U.S. Department of Health and Human Services
Agency for Toxic Substances and Disease Registry

HEALTH CONSULTATION

Review of the Draft Remedial Investigation, Raymark Operable Unit 9,
Short Beach Park and Stratford Landfill
Raymark Industries Site

Stratford, Fairfield County, Connecticut

EPA Facility Id. CTD001186618

**Prepared by
The Connecticut Department of Public Health
Under Cooperative Agreement with
The Agency for Toxic Substances and Disease Registry**

The conclusions and recommendations in this health consultation are based on the data and information made available to the Connecticut Department of Public Health and the Agency for Toxic Substances and Disease Registry (ATSDR). The Connecticut Department of Public Health and the ATSDR will review additional information when received. The review of additional data could change the conclusions and recommendations listed in this document.

A. BACKGROUND AND STATEMENT OF ISSUE

The Connecticut Department of Environmental Protection (CT DEP) requested that the Connecticut Department of Public Health (CT DPH) review and comment on the Draft Remedial Investigation Report for Operable Unit 9 (OU6) - Short Beach Park and Stratford Landfill, prepared for the Environmental Protection Agency (EPA) by Tetra Tech NUS, Inc. (January 2005).

The Remedial Investigation Report (RI) for OU9 evaluates, for Short Beach Park and the Stratford Landfill, the nature and extent of contamination in soils that resulted from past disposal practices of the Raymark Industries facility in Stratford, Connecticut. The RI also documents the public health and environmental risks associated with Raymark waste in the OU9 area.

Raymark Industries was a manufacturer of automotive friction components in Stratford for 70 years, beginning in 1919. During its operation, it was common practice to dispose of manufacturing wastes at the Raymark facility and at various locations in the Town of Stratford. The entire OU9 area (current landfill and park) was used as a disposal site since the 1930s. It received municipal waste from the town of Stratford, dredging spoils from the U.S. Army Corps of Engineers, and industrial waste from the former Raymark facility, and other local industries. After the early 1970s, most of the active waste disposal shifted to the northern portion of the OU9 area, where the current Stratford Landfill is located. The Stratford Landfill is approximately 26 acres in size. It was closed in 1979 to all waste disposal except agricultural materials, brush and leaf litter. Disposal of these materials continues to this day. During the late 1970s and early 1980s, Short Beach Park was developed on the southern portion of the OU9 area. The 54-acre Short Beach Park has a golf course, soccer field, baseball fields, tennis courts, beach, and picnic areas.

Approximately six sampling events have occurred in the OU9 area over the period 1989 to 2004. In 1993, a temporary cap was installed over a portion of the soccer field at Short Beach to isolate contaminants in Raymark Waste that were present in surface accessible soils. The draft RI presents the results of all previous soil sampling conducted in the OU9 area and estimates the health and environmental risks from exposure to Raymark waste present in the soils.

B. DISCUSSION

Child Health Issues

In reviewing the draft RI, CT DPH gave special consideration to whether exposures and risks to children were evaluated appropriately.

Comments on the RI

In reviewing the draft RI, CT DPH focused on the human health risk-related portions of the document. CT DPH provides the following comments to EPA for its consideration.

1. Risk results for recreational visitors at Short Beach Park are not discussed in the draft RI as prominently as they should be, considering that they are the primary receptor group currently using Short Beach Park. For example, risk results for this receptor group are not included in either the Executive Summary or in Section 8 (Summary and Conclusions). We recommend adding a summary of recreational visitor risks in the Executive Summary and in Section 8.
2. A key assumption made in the draft RI is that 100% of a receptor's time at the site is spent in the portion that contains Raymark Waste. At Short Beach Park, this represents only 10% of the total area of the park. This is an important assumption that needs to be communicated more clearly in the Executive Summary and in Section 8. It is especially important for members of the public to understand this assumption in the context of the cancer and noncancer risk estimates.
3. The draft RI does not use the Raymark Waste Fraction that was used in the RI for the commercial properties (OU6). Does EPA have a rationale for why the Raymark Waste Fraction was appropriate to use in the risk assessment for OU6 but is not used in the risk assessment for OU9 (Short Beach Park and Landfill)?
4. It is possible that members of the public will read only the Executive Summary of the draft RI. Therefore, it is important to clearly communicate the fact that the future resident exposure scenario was evaluated only because there is not currently a land use restriction to prevent future residential use. In addition, it should be made clear in the Executive Summary that the future resident scenario evaluates individuals who may, in the future, live in houses built at Short Beach Park. This will avoid any misinterpretation of "future residents" as future residents of the area who do not live at Short Beach Park.
5. The rationale for evaluating pregnant workers is not sufficiently explained in the draft RI. Section 6.3.3 - Potential Receptors should include a discussion of the pregnant worker as a subset of the Commercial Workers-Landfill and Groundskeepers-Short Beach Park receptor groups. The discussion should include the rationale for evaluating pregnant workers, (e.g. for lead exposures, to protect the developing fetus) and why pregnant recreational visitors or pregnant residents need not be specifically evaluated.
6. The draft RI should include results of the 2003-2004 surface soil samples (0-6 inches) from Short Beach Park. These data were evaluated in the health consultation prepared by the CT Department of Public Health in 2004. It is also recommended that this health consultation be cited in the draft RI.
7. The memo in Appendix B-1 states that some samples taken from the capped area were not used in the draft RI because the area was later capped. Additional explanation needs to be added regarding why this is sufficient justification for not using these samples.

8. Wind should be included as a process that could cause contaminants in soils (especially asbestos) to become airborne and pose inhalation risks (Section 5.3 – Fate and Transport).
9. At the time the draft RI is finalized, we recommend that a fact sheet be prepared to summarize the results of the RI for the public. Because Short Beach Park is a highly used recreational area, there may be a great deal of public interest and concern about the RI results. A fact sheet would help make the information in the RI more accessible to the public.
10. Recognizing the fact that the draft RI evaluates only the contamination from the former Raymark Facility (i.e. soil samples meeting the definition of Raymark Waste), it would be prudent for the health and environmental agencies involved with this project to discuss risk communication or exposure prevention activities that may be warranted regarding non-Raymark Waste portions of the site. For example, data on contaminants other than lead and copper are scarce in many parts of the site outside the Raymark Waste portions. Given this fact, are there any risk communication activities that may be warranted to advise people of the data gaps on non-Raymark Waste portions of the site? Are there any exposure prevention activities such as maintaining good grass cover that may be warranted on non-Raymark Waste portions of the site?

C. CONCLUSIONS

Based on its review of the draft RI, CT DPH believes that there are several changes that are needed to improve the document. In addition, CT DPH's comments suggest risk communication activities that should be considered.

D. RECOMMENDATIONS

CT DPH recommends that EPA consider modifying the draft RI in accordance with CT DPH's comments provided in this health consultation.

E. PUBLIC HEALTH ACTION PLAN

Actions Taken

1. CT DPH has provided these comments to EPA for their consideration.
2. CT DPH has begun to work with EPA on a fact sheet summarizing the draft RI.

Actions Planned

1. CT DPH will continue to review data and other materials for the Raymark site, as requested.
2. CT DPH will continue to work with EPA on a fact sheet summarizing the draft RI.

CERTIFICATION

The Health Consultation for **Review of the Draft Remedial Investigation Report for Operable Unit 9 – Short Beach Park and Stratford Landfill, Raymark Industries Site** was prepared by the Connecticut Department of Public Health under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ASTER). It was completed in accordance with approved methodology and procedures existing at the time the health consultation was initiated. Editorial review was completed by the ATSDR Cooperative Agreement Partner.

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The Division of Health Assessment and Consultation, ATSDR, has reviewed this Health Consultation and concurs with its findings.

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