



# TOWN OF STRATFORD

Mark S. Barnhart  
Town Manager

2725 MAIN STREET  
CONNECTICUT 06615

203-385-4001

October 24, 2000

Mr. John Burleson  
Base Environmental Coordinator  
Stratford Army Engine Plant  
550 Main Street  
Stratford, CT 06615-7574

HAND DELIVERED

re: Stratford Army Engine Plant Causeway EE/CA

Dear Mr. Burleson:

I am writing with regard to the proposed remedial action plan for the causeway/dike structure at the Stratford Army Engine Plant as outlined in the Engineering Evaluation/Cost Analysis report of September 22, 2000.

Given the delay in receipt of the final document, which was not available until several days after it was requested, as well as the extremely limited public comment period, I am unable to furnish substantive comments on the more technical aspects of the analysis. I will confine my remarks instead to my general impressions of the plan set forth in the analysis, especially as it relates to the intended future use of the site. I should note that more detailed questions and comments regarding the EE/CA are addressed in a separate letter, a copy of which I have attached hereto.

The proposed remedial plan calls for the removal and subsequent appropriate disposal of contaminated soil from three "hot spot" areas where soil sampling data indicates exceedances of the CTDEP remedial standards. The report then recommends the installation of a geotextile fabric and erosion control cover system over the entire causeway to prevent further migration of contaminant materials. The plan makes some relatively minor concessions to the intended reuse of the causeway/dike area by proposing to use smaller aggregate material along the top center portion of the causeway to provide a more suitable walking surface.

I understand the primary objectives of this non-critical removal action (NCRA) are to prevent present and future exposures to contaminated soils as well as to minimize the potential for leaching of remaining soil contaminants into the groundwater.



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Efforts should be made to maximize treatment techniques so as to reduce to the greatest extent practicable the potential for exposure to soil contaminants. At the same time, I submit that the Army has an obligation to select an approach that is compatible with the future intended use of this site, as identified by the host community. The Town's reuse objectives regarding this area have remained unchanged since virtually the inception of this planning process and have been well documented. The causeway is expected to be part of a public recreational area, which would include a linear park, a bicycle and walking path, a dock and fishing pier in addition to other amenities consistent with its unique waterfront location.

In this regard, I believe that elements of Alternative 2, specifically the installation of a sheet pile seawall, should be incorporated into your final remedial plan. A sheet pile seawall would provide an added level of protection from tidal and wave action and serve as a hydraulic barrier to the constituent wastes that remain buried and encapsulated within the structure. A sheet pile seawall, constructed in conjunction with an appropriately designed erosion control cover system, would further reduce the possibility of migration of soluble contaminants outside the limits of the cap than simply an erosion control cover system alone. Moreover, installation of a sheet pile seawall would provide an even greater degree of consistency with the Town's reuse objectives than other alternatives under consideration since it would preserve access to this structure for the docking or mooring of vessels.

Further, bulkheading or installation of a sheet pile seawall is, as the authors readily acknowledge, a commonly used construction technique. I understand that the Office of Long Island Sound Programs (OLISP) of the CTDEP has expressed concern with regard to this approach, suggesting that this alternative will alter localized wave energy patterns and adversely impact the surrounding intertidal flats. It should be noted, firstly, that the intertidal flats in question are significantly degraded due to decades of industrial production and resultant pollution. Further, while I understand their concern about protection of this resource, such concerns must be balanced against the greater degree of protection afforded by this structure. I might add that not only would a sheet pile seawall provide an added measure of protection against exposure to or migration of contaminant materials, but also it would enhance rather than diminish the utility of this structure.

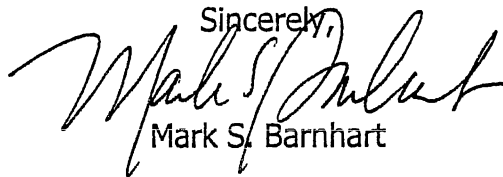
Finally, I would like to comment on the proposed treatment of the top of the structure as it relates to the intended future use of this site to provide and to enhance public access. I concur with the assessment offered by the CTDEP in its response dated March 31, 2000, in which the author states that the proposed cover "...is not likely to be very inviting to the public nor is it likely to provide a safe walking surface." I submit that not much has changed to alter that perspective in the seven months leading to the publication of this final document. I note that the reviewer recommended "...that the Army work with the Town of Stratford to identify a reasonable, inviting treatment for the top of the causeway..." that would

still provide an adequate barrier against exposure to residual contaminants. I regret that such consultations between the Army and the host community never occurred, and the resulting plan, which now calls for the placement of smaller rather than larger rocks, represents no marked improvement in addressing these concerns. I find it difficult to believe that the approach outlined in Alternative 4 represents the most progressive thinking and the best that we can do under these circumstances.

In the end, I submit that the public would be best served by an approach that combines certain elements of the alternatives presented in the EE/CA report, and further re-examines the treatment of the top of the causeway in terms of using appropriate cover material that is complimentary to the community's reuse objectives. In this regard, I assert that installation of a sheet pile seawall, following excavation of certain hot spot areas and in conjunction with an erosion control system, would clearly provide the highest level of protection to human health and the environment at a reasonable cost.

Thank you for the opportunity to comment.

Sincerely,



Mark S. Barnhart

cc: Local Reuse Authority  
Rick Norris, Project Coordinator  
Diane Toolan, Director of Economic Development  
Richard J. Buturla, Esq., Assistant Town Attorney  
Fred Hyatt, BTC, SAEP  
Pete Szymanski, Installation Manager, SAEP  
Robert Kaspari, CBRACO, TACOM  
The Honorable Rosa DeLauro, Member of Congress  
The Honorable George Gunther, State Senator  
The Honorable Terry Backer, State Representative  
The Honorable John Harkins, State Representative  
The Honorable Larry Miller, State Representative  
Arthur J. Rocque, Jr., Commissioner, CTDEP