

September 5, 2013

GREENWICH HIGH SCHOOL ENVIRONMENTAL TESTING UPDATE

Draft Remedial Action Plan

Highlights: *The Town of Greenwich along with the Greenwich Public Schools Board of Education is pleased to announce the release of the Draft Remedial Action Plan (RAP) for the Greenwich High School site. This Plan, which is available for review on the Greenwich Public School website (<http://www.greenwichschools.org/> -- see link for "GHS & MISA Environmental Testing & Reporting"), provides the details for the environmental cleanup (called the Remedial Action) of the High School grounds based on the results of the extensive studies that have been completed.*

The RAP plans for the removal of impacted soil in Areas of Concern (AOC) 1, 13 and other limited areas of the site (See details in this Update and the RAP) and was developed based upon the findings of the Human Health Risk Assessment and the Focused Feasibility Study. The remedial actions described in the RAP are designed to be highly protective of human health in a permanent and cost-effective manner.

The time frame for implementing the RAP will be over the next two years, with work primarily being completed during the schools' summer breaks of 2014 and 2015. After remedial activities are completed:

- Inspection and maintenance activities will be performed to maintain the effectiveness of protective barriers that are currently in place or will be constructed during remediation,*
- Groundwater monitoring will be performed to assess site conditions and evaluated to confirm that site conditions are unchanged, and*
- An Environmental Land Use Restriction (ELUR) will be developed for the site. The ELUR will provide procedures to be followed for all activities to be performed at the site where impacted soil may be encountered (e.g., intrusive construction activities).*

Public comments are welcome on the draft RAP from September 5 through October 5, 2013 (refer to the back page of this Project Update). All comments received will be considered and will be incorporated into a revised RAP, which will be submitted to state and federal agencies for review and approval.

Where will soil be excavated from the site during the Remedial Action?

These areas of the site where remedial actions are planned are shown on the attached Figure 3-1 (which is Figure 3-1 from the RAP report).

Remedial activities in AOC 1 will include removal of soil impacted by PCBs above the remediation goals in areas considered accessible by site users (e.g. students, staff, custodians, visitors, and construction and maintenance workers). Remedial activities will include removing potentially accessible surficial soils in the areas of Field 2 and surrounding Fields 3, 4 and portions of Field 5 (see Figure). Soils beneath the artificial turf and asphalt paved areas are considered inaccessible (no complete exposure pathway, thus risks have already been minimized) and remediation is not planned for these locations. Within AOC 1, the following excavation depths will be accomplished:

- The areas to the south and west of Field 3 will be excavated to **1 foot below the ground surface**. This will prevent exposures to impacted soil within these limited areas where it is unlikely that utilities will be*

Public Meeting

**Wednesday, September 18, 2013
6:00-9:00PM**

Greenwich High School Auditorium

The Greenwich Public Schools/Board of Education and the Town of Greenwich invite you to a discussion about the draft RAP for the Greenwich High School. The US EPA, as well as the CT Department of Energy and Environmental Protection (DEEP) and Department of Health (DPH) will also be available to discuss the project and respond to questions.

The Chairman of the Board of Education, Superintendent of Schools, Commissioner for the Department of Public Works, MISA Building Committee Chairman, U.S. EPA, CT DPH and CT DEEP representatives, and environmental experts will be available during this time to respond to questions and discuss the draft RAP. A brief presentation about the plan will be provided at 7:00pm, following an informal opportunity to meet with these representatives starting at 6:00pm.

installed and only minimal and non-invasive maintenance measures will be performed.

- Soil within a portion of Field 2 will be excavated to **2 feet below the ground surface**. While it is unlikely that utilities will be installed within these areas, excavation to this depth will allow for field maintenance activities to be performed without special protective measures. An additional area to be paved on the south of the west parking lot will also be excavated to a depth of 2 feet prior to placing asphalt.
- The area to the east of Fields 2, 3 and 4 and covering a portion of Field 5 will be excavated to **3 feet below the ground surface**. This is an area where utilities are likely to be installed and excavation to create 3 feet of clean soil below final designed elevations will allow for installation of most utilities without special protective measures to prevent exposure to utility or construction workers.

Remedial activities in AOC 13 will include excavation of potentially accessible surficial soils in five areas in the southeastern portion of the site and one area to the north of Field 1 (see Figure). Excavation in these areas will be conducted to remove areas where arsenic was reported at concentrations above the determined background (naturally occurring) concentration of 20 mg/kg. Soil excavation will be completed to approximately 1 foot below the ground surface.

Excavations will also be completed over several smaller areas of the site to address the following concerns:

- Soil excavation will be completed to approximately 2 feet below the ground surface near soil samples SS-248 and SS-249 (see Figure). Excavation in these areas will be conducted to remove areas where PCBs were reported at concentrations above remediation goals.
- Soil excavation will be completed to approximately 1 foot below the ground surface near soil samples SS-243, SS-244 and SS-279 (see Figure). Excavation in these areas will be conducted to remove soil where chlordane was reported at concentrations above the remediation goal.
- Excavation of potentially accessible surficial soils from three areas on the southern portion of the site and three areas on the northern portion of the site (Fields 6 and 7 – see Figure) will be conducted to remove areas where benzo(a)pyrene was reported at concentrations above the remediation goal. Soil excavation will be completed to approximately 1 foot below the ground surface.

Upon completion of the sampling to confirm the completion of soil remediation, the significant exposure pathways identified for the site in the Human Health

Risk Assessment will be eliminated. These include the potential direct exposure migration pathways of dermal contact, ingestion, and inhalation.

When will the work be completed?

Remediation work will only be conducted during the summer school vacations, so as not to impact school activities. We anticipate that the work will occur during the summer of 2014 and the summer of 2015 (June through August).

What precautions are being taken to protect the community during the work?

The remediation work at the site will be conducted in accordance with an approved Site Health and Safety Plan that will be prepared to meet the requirements provided by the Occupational Safety and Health Administration (OSHA) for the protection of workers. Other safety measures will include:

- Air monitoring and testing will be conducted outside the site work zone to test for dust that could potentially leave the site. There will be methods to control dust on-site if the air monitoring and testing indicates the need for it.
- Trucks leaving the site with soil will be cleaned and covered tightly to eliminate dust or soil from leaving the trucks.
- Truck staging and loading will be limited to the parking lots on the property. Trucks will not park in streets and impede traffic flow.

What routine monitoring will happen after the excavation work is done?

An Inspection, Maintenance, and Monitoring Plan will be developed following the completion of remedial activities. This plan will describe inspection and maintenance activities that will be performed to maintain the effectiveness of protective barriers that are already in place and will be constructed during remediation. Groundwater monitoring will be performed to assess site conditions and evaluated to confirm that site conditions are unchanged.

In addition, an environmental land use restriction (called an ELUR) will be recorded on the land records that will provide guidelines for future site activities such that they are performed in a safe manner and that protective barriers are restored following performance of these activities. In other words, this ELUR would protect against inappropriate excavation at the site. If excavation is required, the Town will request a temporary release of the ELUR and will provide soil management plans to CTDEEP.

Opportunities for Public Input

Public acceptance is an important component to the RAP. A public communication program has been ongoing for the site and continues to be implemented.

Availability of the Remedial Action Plan

The draft RAP is available for public review. The report has been posted to the Greenwich Public School website (<http://www.greenwickschools.org/> -- see link for "GHS & MISA Environmental Testing & Reporting"). A hard copy of the report is also available at the Town of Greenwich Board of Education offices.

Public Meeting

The Greenwich Public Schools/Board of Education and the Town of Greenwich are planning a Public Meeting to discuss the draft RAP. The Meeting will be held on **September 18, 2013** at the Greenwich High School Auditorium from 6:00PM to 9:00PM. A presentation on the draft RAP will be made at 7:00 PM, following an informal opportunity to discuss the draft RAP starting at 6:00PM.

The Chairman of the Board of Education, Superintendent of Schools, Commissioner for the Department of Public Works, MISA Building Committee Chairman, U.S. EPA, CT DPH and CT DEEP representatives, and environmental experts will be available during this time to informally

discuss the draft RAP as well as respond to community questions about the proposed remedial activities.

Open Period for Public Questions or Comments

We encourage you to attend the public meeting on September 18, 2013 to learn about the draft RAP.

In addition, an online opportunity to submit questions and comments on the draft RAP has been provided on the Greenwich Public Schools website. This public comment opportunity will remain available through October 5, 2013. Follow this link to submit questions or comments on the draft RAP:

<http://www.greenwickschools.org/page.cfm?p=10915>

Responses to these questions and comments will be posted on the website and will also be provided to federal and state regulators for their consideration.

Future Steps - Moving into Remediation

At this point in the process, the draft RAP has been made available to the public for comment. A public meeting is planned to present the plan. After the public comment period is complete and public comments have been considered and incorporated, a revised RAP will be prepared and submitted to federal and state regulators for review and approval.

For all information requests, please contact:

Kim Eves, Greenwich Public Schools Director of Communications

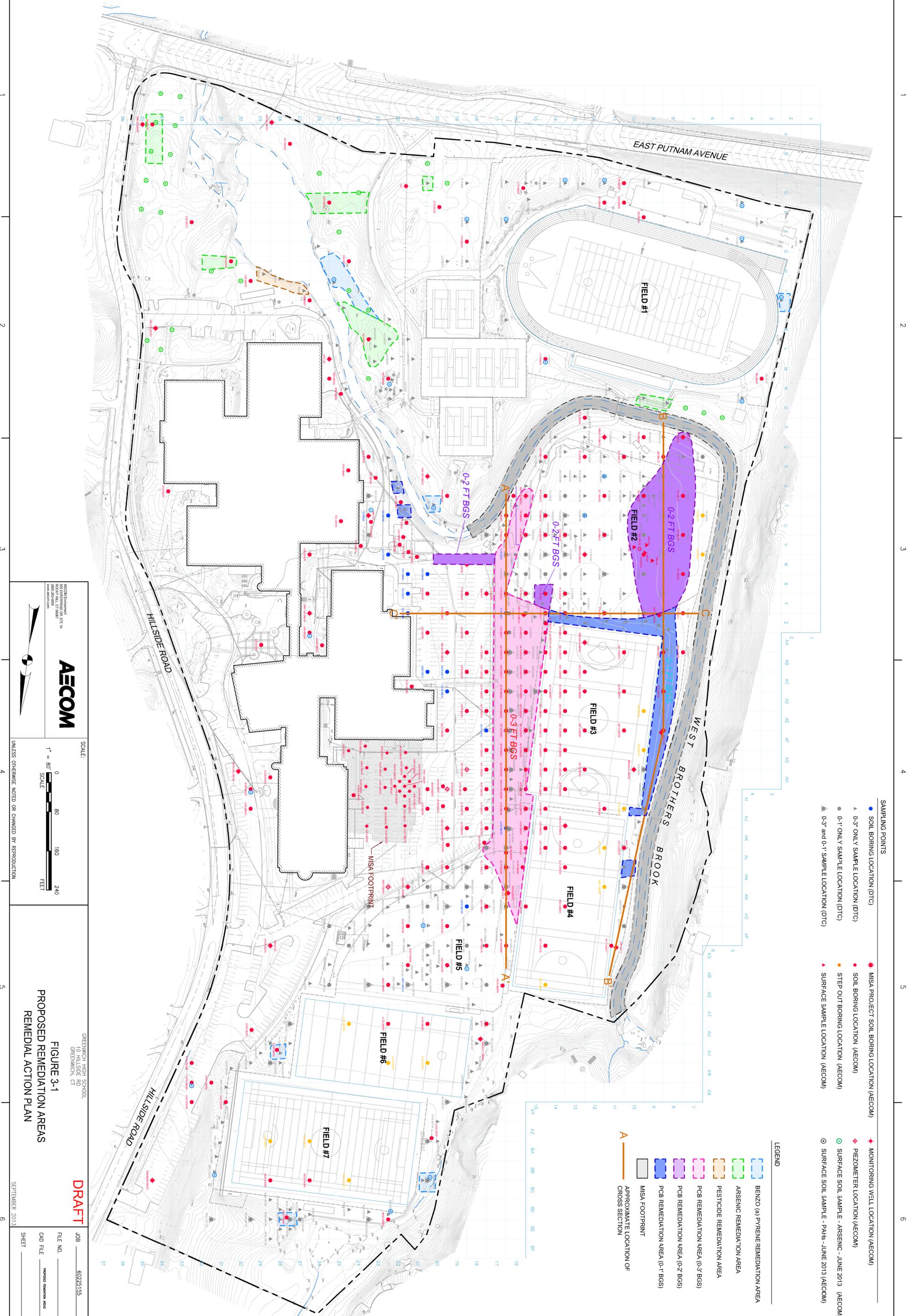
203-625-7415 or kim_eves@greenwich.k12.ct.us

OR, please visit our website for further information:

<http://www.greenwickschools.org/>

see link for "GHS & MISA Updates for Environmental Testing & Reporting"

ARCH D - 3-7-05



- SAMPLING POINTS**
- SOIL BORING LOCATION (DTC)
 - ▲ 0-3" ONLY SAMPLE LOCATION (DTC)
 - 0-1" ONLY SAMPLE LOCATION (DTC)
 - ▲ 0-3" and 0-1" SAMPLE LOCATION (DTC)
 - MISA PROJECT SOIL BORING LOCATION (AECOM)
 - SOIL BORING LOCATION (AECOM)
 - STEP OUT BORING LOCATION (AECOM)
 - ▲ SURFACE SAMPLE LOCATION (AECOM)
 - MONITORING WELL LOCATION (AECOM)
 - ◆ PIEZOMETER LOCATION (AECOM)
 - SURFACE SOIL SAMPLE - ARSENIC - JUNE 2013 (AECOM)
 - SURFACE SOIL SAMPLE - PAHs - JUNE 2013 (AECOM)

- LEGEND**
- BENZO (a) PYRENE REMEDIATION AREA
 - ARSENIC REMEDIATION AREA
 - PESTICIDE REMEDIATION AREA
 - PCB REMEDIATION AREA (0-3' BGS)
 - PCB REMEDIATION AREA (0-2' BGS)
 - PCB REMEDIATION AREA (0-1' BGS)
 - MISA FOOTPRINT
 - APPROXIMATE LOCATION OF CROSS SECTION

SCALE: 1" = 80' FEET

AECOM

ADDITIONAL Personnel:
 500 ENTERPRISE DR. STE. 1A
 WESTBOROUGH, MA 01581
 WWW.AECOM.COM

UNLESS OTHERWISE NOTED OR CHANGED BY REPRODUCTION

DRAFT

GREENWICH HIGH SCHOOL
 10 HILLSIDE RD
 GREENWICH, CT

FIGURE 3-1
PROPOSED REMEDIATION AREAS
REMEDIAL ACTION PLAN

SEPTEMBER 2013

JOB: 60225155
 FILE NO.:
 QAD FILE: PROPOSED REMEDIATION AREAS
 SHEET: _____