

GREENWICH HIGH SCHOOL ENVIRONMENTAL TESTING UPDATE

Overview of the Environmental Study and Remediation Process

Highlights: *The purpose of this summary is to provide an overview of the current status of the project, the proposed clean up option, and next steps.*

- *The majority of the GHS Environmental Study has been completed. Full reports, Executive Summaries and Public Updates summarizing each report have been issued and are available on the project web site.*
- *The proposed cleanup option for the site represents a middle ground between minimum requirements and the most extensive option of complete excavation of the site. The proposed option would restore complete and safe access to the site and has a high probability of acceptance by the regulatory agencies, with an estimated cost of \$13 to \$20 million to implement.*
- *An initial Public Comment Period including a Community Forum, Public Hearings and an online comment opportunity has been completed. Responses to questions submitted by the community will be posted to the project web site by the end of June 2103.*
- *Next Step: A draft Remedial (Cleanup) Action Plan is scheduled to be released in Fall 2013.*
- *The next Public Comment Period will follow the release of the draft Remedial Action Plan.*
- *Community input is an important part of the development of the Remedial Action Plan. We encourage your questions and feedback throughout this process.*
- *Future Steps: A timeline has been provided (attached), subject to modification.*

Brief Project History

In mid-July 2011, during the course of excavation work for the Greenwich High School (GHS) Music Instructional Space and Auditorium (MISA) project, unexpected soil conditions were discovered in the west (or back) parking lot, adjacent to the athletic fields. This finding prompted several rounds of environmental testing, where initial test results showed levels of a class of chemicals known as polychlorinated biphenyls (or PCBs) in soil above standards set by the Connecticut Department of Energy and Environmental Protection (DEEP). Based on these findings, and in coordination with State and Federal regulatory agencies, several interim measures were completed, which included limited removal of soil and installation of fencing to restrict access to particular areas of the site.

A comprehensive environmental study of the high school campus grounds has been completed over multiple phases (December 2011, and February, April, and June/July 2012; corresponding with school vacations). During these investigation phases, over 1,400 environmental samples have been collected of soil, groundwater, sediments and surface water in the brook and pond, ambient air, and soil vapor. As a part of the environmental study program, groundwater monitoring has and will continue into the future. A round of groundwater monitoring was completed during the February 2013 school break and another round is planned for May 2013.

Environmental Study Results

The results from this comprehensive study show some areas of environmental impacts. These impacts appear to be largely focused in areas where fill material was imported to the campus during the development of the school in the late 1960s (in particular beneath the west parking lot and fields 2, 3, 4 and 5). Based on the data collected, the environmental impacts are contained on-site (i.e., the data does not show migration of chemicals off the Greenwich High School campus). Importantly, the school buildings were not built on this fill (they were built substantially on top of bedrock), thus the contamination does not appear to extend beneath the school buildings.

State and Federal regulatory agencies have been involved throughout this process, and have reviewed the findings from this study. These agencies further supported the evaluation of human health and environmental risks at the Site. The Human Health Risk Assessment demonstrates that there are no imminent health threats posed by the presence of the fill material below the surface of the Site. Estimated current risks for cancer and noncancer effects are below target levels established by the regulatory agencies, and thus represent levels of risk considered “acceptable”. This included: students, teachers, school visitors (spectator), and maintenance workers (custodians or groundskeepers). Therefore, the site is and remains safe for use. Potential future risks (i.e., the exposure is not occurring now, but might in the future), exist for construction workers who may contact the fill material and these should be controlled.

The results of the comprehensive study are summarized in three reports (refer to our website for copies of these reports, as well as short, non-technical summaries of each report):

- Remedial Investigation
- Screening Level Ecological Risk Assessment
- Human Health Risk Assessment

Cleanup Alternatives Described in Feasibility Study

A Feasibility Study was also completed for the Site. The Feasibility Study considers the data from the environmental study and the results of the Risk Assessments to identify cleanup objectives for the Site. The Feasibility Study then presents, describes and compares various remedial (cleanup) alternatives for the Site that would achieve those objectives and, ultimately, recommends a cleanup approach for the Site.

The Feasibility Study considers and reviews a wide range of alternatives to address the impacts at the site. These alternatives range from limited remedial actions that involved removal of one foot of soil to removal of all soil impacted at concentrations above the most stringent criteria at the site. Other alternatives that offer a wide range of realistic, comprehensive options are also included.

Recommended Cleanup (Remedial) Alternative

The Feasibility Study also identified the recommended alternative to address the environmental impacts at the High School site. The recommended alternative involves the removal of impacted soil (excavation) to varying depths beneath:

- Area of Concern or AOC 1, which is the area of the Site where fill material was imported during the development of the school in the late 1960s. It is noted that this area includes the synthetic turf fields, and that excavation beneath these fields is not proposed.
- AOC 13, which is an area in the southeastern corner of the site (bounded by East Putnam Avenue and Hillside Road) where arsenic was found at elevated levels in soil samples.
- Several smaller limited areas of the Site.

After excavation, these areas of the Site will be restored to their current condition (e.g., grass, concrete, asphalt, etc.).

Some impacted soil would be left in place and capped. Regular monitoring of the site would continue for the long-

term. A site restriction to control and restrict deep excavations would be necessary, but shallower excavations (to access utilities) would be allowed.

Remediation work would only be conducted during the summer school vacations, so as not to impact school activities. This option would take 2-3 summers to implement, and would greatly reduce potential risks at the Site. This option is estimated to cost between \$13 and \$20 million to implement.

Public Comment Period on Environmental Study reports (including Feasibility Study)

A public communication program has been ongoing and continues to be implemented. A public open house and meeting was held on March 6, 2013. This provided an opportunity for the public to make comments and ask questions. In addition, an online opportunity to submit questions and comments on the environmental study and Feasibility Study has been provided on the Greenwich Public Schools website. This online opportunity was available through April 30. 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.

Next Step – Remedial Action Planning

Now that the public comment period has concluded, a draft Remedial Action Plan will be prepared for the Site. This plan will provide a detailed description of the selected remedial alternative, cost and schedule.

This plan will be provided to the public and discussed in a public forum, similar to the March 6 public meeting. A separate comment period will also be provided for this plan.

After the public comment period on the Remedial Action Plan is complete, a final report will be prepared and submitted to federal and state regulators for review and approval.

Future Steps – Moving into Remediation

To give the community an idea of how the pieces of this process fit together, a timeline of events has been prepared (see attached flyer). This timeline shows the key steps of the remediation process, and when they might be implemented over the next several years. Please note that this is a depiction of the process; there are many moving factors that may impact this schedule.

For all information requests, please contact:

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OR, please visit our website for further information:

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

see link for “GHS & MISA Updates for Environmental Testing & Reporting”

Greenwich High School Environmental Planning and Cleanup DRAFT PRELIMINARY TIMELINE

