

GREENWICH HIGH SCHOOL ENVIRONMENTAL TESTING UPDATE

Site Status: August 2012 – All GHS Fields are Open Summary and Schedule

Highlights: *The majority of the environmental study of the Greenwich High School campus grounds has been completed. Several rounds of environmental studies have occurred (December 2011, February 2012, April 2012, and June/July 2012) and the site program will now move into the next phase. This Project Update includes information regarding:*

- **The athletic fields which are open for use.**
- *Two additional packages of information available on the GHS Environmental Testing website.*
- *Future activities planned for the next phase of work.*

Background and Introduction

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). The majority of the environmental study of the high school campus grounds has now been completed.

Separate phases of the study were completed in December 2011 and February, April 2012, and June/July 2012, corresponding with school vacations. During these study phases, environmental samples were collected of soil, groundwater, sediments and surface water in the brook and pond, ambient air, and soil vapor. Groundwater sampling and monitoring will continue and some additional limited sampling of soil, sediments, and surface water may be required. This work will be limited and conducted in a manner that will limit impacts to school and athletic program schedules.

Earlier Project Updates (such as this one) have been prepared summarizing the data results from the December 2011 study (Project Update dated March 6, 2012), the February 2012 study (Project Update dated April 20, 2012), and the April 2012 study (Project Update dated Jun 14, 2012). These Updates can be found on the Greenwich Public Schools' (GPS) website (*refer to page 2 of this Update for a link to our website*). A Project Update will also be prepared for the June/July 2012 environmental study once the data have been confirmed and evaluated. This Project Update has been prepared to communicate the status of the athletic fields, the availability of additional information on our website, and to provide information on the next phase of work.

Site Status

Athletic fields 3, 4, 6, and 7 were closed during the June/July 2012 study program so that soil borings could be performed within these fields. The closure of these fields was required because, in order to perform the borings, the artificial turf had to be cut. The cuts in the turf created a temporarily unsafe condition which could pose a risk to field users. Now that the environmental study in these fields has been completed and the cuts in the turf repaired, these fields are once again safe for use and they are open.

Additional Information

Additional information regarding the GHS site has been posted to our Environmental Testing website. The files available to the community include all of the information provided to federal regulators in response to questions they had regarding the GHS site. The United States Army Corp of Engineers (USACE) submitted a request to the Town of Greenwich regarding historical wetlands formerly located at the GHS site and the sequence of construction activities at the site. The United States Environmental Protection Agency (USEPA) Region 1 PCB Coordinator, Ms. Kim Tisa, requested additional information regarding MISA construction, groundwater dewatering for construction and associated monitoring, and public communications.

• Response to USACE

The USACE submitted a written request for information regarding the GHS site on July 9, 2012. The USACE requested further information regarding historical construction activities at the site including potential filling of waters and wetlands, construction of drainage culverts at the site, and plans for school expansion.

The response posted on the GPS website provides a timeline for construction activities, details as to the diversion of West Brothers Brook into a concrete culvert in the late sixties, historical filling of wetlands, a discussion of planned school expansion, and supporting documents. The diversion of the

brook and filling of wetlands on the GHS site was completed prior to 1970 and the promulgation of the governing regulations (Clean Water Act) that currently regulate such activities. As such, the historical construction activities performed at the GHS site are not covered by the Clean Water Act. Future construction activities planned for the GHS site will not be performed within waters or wetlands existing at the site so they are not subject to the Clean Water Act. No response from USACE has been received at this time.

• **Response to USEPA**

Kim Tisa of USEPA verbally requested information regarding MISA construction, public communications, and discussions in public forums regarding GHS site environmental impacts. This request was made because USEPA wanted additional information before they completed their review of the MISA Remedial Action Plan and Addendum.

The response posted on the GPS website includes all of the additional information provided to USEPA. The response provides details regarding construction-related activities performed to limit dewatering (removal of water from a construction excavation to create a “dry” place to work) during construction and groundwater monitoring to be performed during these dewatering efforts. Also attached to the response are copies of meeting minutes from the numerous Town board and committee meetings during which environmental site conditions were discussed. These meeting minutes were all downloaded from the Town of Greenwich website (www.greenwichct.org) and will be made available upon request. USEPA will use the information provided and continue their evaluation of the MISA remedial plans.

What happens next?

Now that the major portion of environmental study activities have been completed, the GHS site program is moving into a new phase of activities and planning. This new phase includes preparation of the following reports which will be provided to the USEPA and CT DEEP regulators and to the public on our website when they are completed. Project

Updates describing the contents of the reports and summarizing the findings will also be prepared. These updates will be made available in late September and October.

- **Remedial Investigation (RI) Report** - This report will summarize all environmental study activities performed at the site since the discovery of chemical impacts in mid-July 2011.
- **Human Health Risk Assessment (HHRA) Report** – This report will evaluate potential risks posed by the chemicals identified during the site environmental studies for all environmental media (soil, water, air). A model will be developed and used to evaluate exposure and potential risk for all site users (students, faculty, building and field maintenance staff) and the surrounding community. The information developed for the HHRA will be used to plan remedial (cleanup) alternatives for the GHS site.
- **Screening Level Ecological Risk Assessment (SLERA) Report** – This report will evaluate potential risks posed by the chemicals identified during the site environmental studies in sediment and surface water. A model will be developed and used to evaluate impacts to plant and animal species typically found in this type of environment. The information developed for the SLERA will be evaluated and possibly used to develop remedial alternatives. Additional limited testing may also be needed to more fully evaluate impacts to plant and animal species and remedial alternatives.
- **Feasibility Study Report** – This report will identify and evaluate remedial alternatives for the site. This study will evaluate different strategies for the environmental cleanup and include estimates for the overall cost for the cleanup and the schedule for performing the cleanup.

After completing the Feasibility Study, the team will still have much work ahead, including remedial planning and design, coordination with regulatory agencies for approvals to move forward, and additional public communications.

For all information requests, please contact:

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OR, please visit our website for further information:

<http://www.greenwichschools.org/>
see link for “Updates for Environmental Testing at GHS”