

GREENWICH HIGH SCHOOL ENVIRONMENTAL TESTING UPDATE

Remedial Action Plan: Additional Data Analyses and Response to Agency Comments

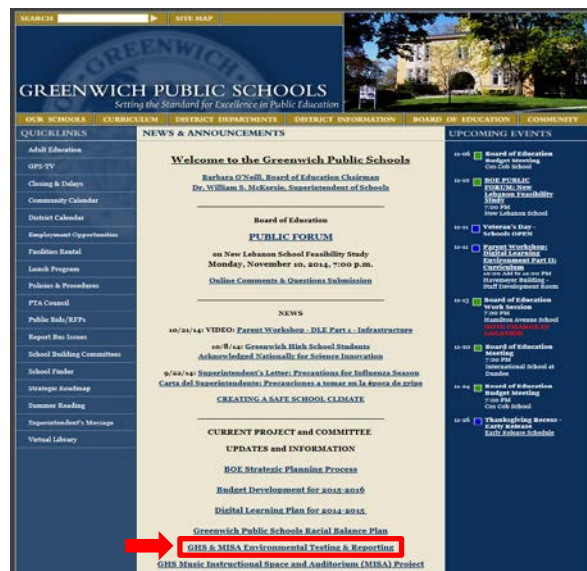
Introduction:

The Town of Greenwich along with the Greenwich Public Schools Board of Education submitted the Remedial Action Plan (RAP) for the Greenwich High School site to the U.S. Environmental Protection Agency (USEPA) and the CT Department of Energy and the Environment (DEEP) in November 2013.

The USEPA provided comments on this document in March 2014, and requested the collection of additional sampling data, and that other analyses be conducted.

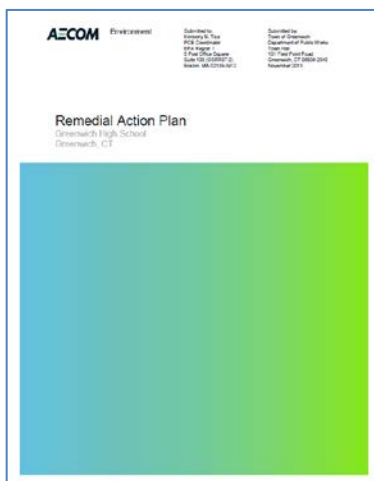
These data have been collected and analyzed, and have been provided to the Agencies in a letter, dated October 21, 2014, called the Response to Comments on the RAP. This letter can be found at: <http://www.greenwichschools.org/> -- see link for "GHS & MISA Environmental Testing & Reporting."

This Project Update provides a summary of the information presented in the Response to Comments Letter.



Background

The Remedial Action Plan (RAP) for the Greenwich High School site 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 Town of Greenwich, along with the Greenwich Public Schools Board of Education, publicly released the Draft RAP for the Greenwich High School site in September 2013. A public comment period for the Draft RAP was held from September 5 through October 5, 2013. After review of public comments, the document was revised and submitted to the USEPA and the DEEP for

Agency review in November 2013.

During their review, the Agencies requested additional information regarding groundwater conditions and future groundwater monitoring at the Site. This information was

compiled and was provided to the agencies in February 2014. The USEPA provided additional comments with a request for additional sampling data on March 5, 2014. Since then, the Town and BOE have been collecting the data and performing the requested analyses.

A summary of the data collected and analyzed, as well as responses to USEPA's March 5, 2014 comments can be found at: <http://www.greenwichschools.org/> -- see link for "GHS & MISA Environmental Testing & Reporting." This Project Update provides a summary of the information presented in the Response to Comments letter.

Response to Comments on the RAP

Since submittal of the RAP to the regulators in November 2013, the Town of Greenwich, along with the Greenwich Public Schools Board of Education, continue to work with the regulatory agencies to make sure the Site remains safe for use.

The letter dated October 21, 2014 being provided to the regulatory Agencies provides:

1. A summary of the data and evaluations that have been completed since March, and
2. Response to Agency comments received in March.

Data Evaluations and Results

At the request of the USEPA, additional data or evaluations to support the Remedial Action Plan for the Greenwich High School site have been collected, synthesized, and analyzed.

Potential Impact of Storm Events on Groundwater beneath the Athletic Fields

Regarding the potential impact of storm events on the groundwater beneath the Greenwich High School athletic fields, data analyzed indicate that:

- Groundwater under the fields is not expected, even during extreme storm events, to overwhelm the drainage system beneath the artificial turf fields. The drainage system was constructed in a manner that will handle such events.
- Longer-term duration extreme storms will not raise groundwater elevations to the level where they might intersect the drainage layer beneath the artificial turf fields.

Samples of Turf Field Drainage Blanket Collected

Samples of the turf field drainage blanket (mat) were collected at two separate locations in the artificial turf fields and analyzed for PCBs. These data show that:

- All reported PCB concentrations are below the strictest federal and state standards.

Options for Managing Stormwater Scenarios

Options for managing stormwater and groundwater under a variety of scenarios are provided.

Additional Cost Estimates Provided

Cost estimates for alternate configurations for removal of additional soil at the Site as well as institutional controls are provided.

Concentrations of PCBs in Groundwater Mapped

Concentrations of PCBs in groundwater over several monitoring periods are presented. These data show that:

- Results from the most recent groundwater monitoring rounds indicate that site conditions were the same or similar to what has been previously observed.
- The extent of groundwater impacts is well delineated, limited, and contained well within the property limits.

Next Steps and Status of RAP

The Town of Greenwich, along with the Greenwich Public Schools Board of Education, are committed to working with regulators to complete the remediation of the Greenwich High School site. Agency review, comment and response to comments are typical steps of the RAP review process. We hope that with the submittal of these additional data and data analyses, the Agencies will promptly move forward with their review and approval of the RAP.

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 "GHS & MISA Updates for Environmental Testing & Reporting"