

November 22, 2019

GREENWICH HIGH SCHOOL ENVIRONMENTAL TESTING AND REMEDATION PLANNING UPDATE

Fact Sheet and Status Update

Highlights:

- ***The Site is safe for use*** – the Site continues to be safe and parking areas and athletic fields are available for use. Some fenced areas remain.
- *The Site is part of the Connecticut Department of Energy and Environmental Protection (CTDEEP) Voluntary Remediation Program and we are working with regulators to complete cleanup of the property.*
- *Routine monitoring of the site continues while remediation planning is being conducted.*
- *The Town recently met with CTDEEP and EPA to review investigation findings and discuss plans for cleanup and the sequence of remediation activities.*

Current Status Overview

Site investigation activities are winding down although environmental monitoring will continue. The Town met with the CTDEEP and EPA in August and October to review findings of the environmental investigation, respond to regulator questions and plan for the upcoming phases of remediation, which will begin in 2020.

Voluntary Remediation Program

The Town entered the Connecticut Voluntary Remediation Program (VRP) in 2017 to establish a more structured framework for CTDEEP review and approval of site remediation plans. The Town and BOE have been in regular communication with EPA and CTDEEP to answer questions regarding the extensive environmental study and remedial action planning for the Site.

Site Remediation Planning

Remediation planning is focused on providing environmental protection of human health and the environment, while accommodating school activities and other uses of the school property. To address athletic field maintenance requirements, while working with regulators to reach agreement on the final details of sitewide remediation, cleanup of the site will be separated into two primary phases.

Phase I Remediation

The first phase of remediation will primarily focus on cleanup of the northern part of the school property to allow replacement of the playing surfaces on Fields #6 and #7. These fields are scheduled to be renovated during the summer of 2020. The Phase I Remedial Action Plan (RAP) is being revised to address regulator comments on the draft Phase I RAP, which was submitted in May 2019. The revised Phase I RAP will be submitted in December 2019 and will detail the remediation activities to be performed in conjunction with field renovation. Additional remediation of smaller areas will also be included in the Phase I RAP for 2020. The majority of the work is scheduled to be completed during the school summer recess. As part of the Phase I RAP, an Engineered Control (EC) Variance Application has been prepared and submitted to CTDEEP. The EC will incorporate the field design to establish an environmental cap over Fields #6 and #7.

Public input is an essential part of the remediation planning and regulatory review process. A 45-day public comment period will be announced, as required by the Connecticut Remediation Standard Regulations. Members of the community and interested parties will have an opportunity to review the remediation plans and provide comments and questions. This public input will be considered by the regulators and the Town and BOE prior to finalizing the remediation plans. It is expected that regulatory approval will be provided in mid to late winter of 2020. This will give the Town and BOE time to contract for the remediation work to be completed during the summer of 2020.

Phase II Remediation

The second phase of remediation will focus on the remainder of the school property that requires remediation. This will include extensive cleanup activities to be performed in conjunction with the replacement of the playing surfaces on Fields #3 and #4 (located adjacent to the parking lot west of the school buildings). The goal is to renovate these fields during the summers of 2021 and 2022 and address the remaining remediation areas in the following years with the goal of completing all remediation in a four to five-year timeframe, beginning in 2020. Work will be completed primarily during the school's summer recesses. A Phase II RAP is being prepared and is expected to be submitted to the regulators for review during Spring 2020.

Public notice will also be part of the Phase II remediation process, and input from members of the community and interested parties will be considered by the regulators and the Town and BOE prior to finalizing the Phase II remediation plans. Regulatory comments and approvals will further inform the schedule for the Phase II remediation, but it is hoped that regulatory approval will be provided during Summer 2020. This will give the Town and BOE time to plan accommodations for use of the school facilities during the work over summer breaks and to contract for the work to be completed.

Environmental Land Use Restriction

An Environmental Land Use Restriction (ELUR) is an easement on a property restricting activities that may be performed on a site and recorded on the municipal land records. The purpose of an ELUR is to ensure that conditions at the site remain protective of human health in perpetuity by restricting certain activities at a property or a portion of a property. An ELUR is expected to be placed on the property following the completion of remediation to allow the remedial goals for the school property to be dependent on the potential for exposure associated with site use, rather than requiring that all contaminated soil be removed and sent off-site, regardless of depth, cost, or disruption to school activities. The ELUR will be recorded on the land records for the GHS property.

Ongoing Maintenance and Monitoring

The remediation activities implemented as part of cleanup of the school property will require ongoing maintenance and monitoring. This will include groundwater monitoring, as well as maintenance of environmental cap areas and regulatory reporting.

Additional Information

For all information requests, please contact:

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Or please visit the Greenwich Public Schools website: <http://www.greenwichschools.org/>
See Link for GHS and MISA Environmental Testing and Reporting