



June 28, 1996

35241.5

Ms. Sherrel Henry
United States Environmental Protection Agency
Region II
Emergency and Remedial Response Division
290 Broadway
New York, New York 10007-1866

**Soil Sampling Program - AST Area
Phase II Remedial Investigation
Virgin Island Chemical Site
St. Croix, U.S. Virgin Islands**

Dear Ms. Henry:

The purpose of this letter is to confirm a May 30, 1996 telephone conversation between Mr. Edward Nemecek of Harding Lawson Associates (HLA) and Mr. Mel Hauptman of the U.S. Environmental Protection Agency (EPA) regarding the scope of field work for this project. Based on problems encountered with sample shipment (described below) and conditions encountered in the field, the following changes have been made to the scope of work:

- On May 22, 1996, HLA collected surface soil samples from locations SBB2 through SBB13 (Figure 1), according to procedures described in HLA's May 15, 1996 letter and the EPA-approved Sampling and Analysis Plan (HLA, 1994). HLA shipped these samples via Federal Express to PACE Laboratory (PACE) in Louisiana on the same day. Although the appropriate permits and paperwork were in place, these samples were held by U.S. Customs in Tennessee. These samples were not released from U.S. Customs in time to be loaded on to the Federal Express plane leaving for Louisiana. The samples were not delivered to PACE until May 24, 1996. Upon receipt, the laboratory measured the sample temperatures at greater than 22 Centigrade (°C). In conformance with the Sampling and Analysis Plan, these samples were not analyzed. In response, HLA collected a second surface sample within 2 feet of borings SBB4, SBB6, and SBB11 (renamed SBB4A, SBB6A, SBB11A, respectively) and also collected surface samples at borings SBB16 and SBB17 (Figure 1). These 5 surface samples were submitted to Pace for TCL VOC analysis prior to the May 30, 1996 telephone conversation between Mr. Hauptman of EPA and Mr. Nemecek of HLA (discussed below).
- On May 24, 1996, HLA collected subsurface soil samples from locations SBB4, SBB6, and SBB11, according to procedures described in HLA's May 15 letter and the EPA-approved SAP. HLA shipped these samples via Federal Express to PACE on the same day. Although the appropriate permits and paperwork were in place, these samples were held by U.S. Customs in Tennessee. These samples were not released from U.S. Customs in time to be loaded on to the Federal Express plane leaving for Louisiana. Due to the Memorial Day Holiday weekend, the samples were not delivered to PACE until May 28, 1996. Upon receipt, the laboratory measured the sample temperatures at greater than 23 Centigrade (°C). In accordance with the Sampling and Analysis Plan, these samples were not analyzed. In response, HLA advanced another boring adjacent to the affected borings and collect soil samples from the same depths that the original samples were collected. These samples arrived at PACE on June 1, 1996. Upon receipt, the laboratory measured the sample temperatures at 1°C. These samples are currently being analyzed along with the other soil boring samples.
- On May 30, 1996, Mr. Nemecek of HLA contacted Mr. Hauptman of EPA to inform him that resampling of the surface soil in the AST area did not appear to be warranted, based on soil photoionization detector

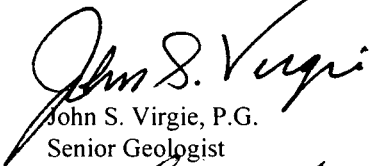
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(PID) measurements (zero at all surface locations except 5.7 ppm at SBB11 and 0.6 ppm at SBB4A) and field observations (no staining or odors) of soil samples collected from the 0 - 2 ft bgs interval. Mr. Nemecek also pointed out that HLA had installed and sampled seven soil borings (one more than proposed in HLA's May 15, 1996 letter), and that data from these borings were adequate to evaluate the vertical and lateral extent of VOCs in soil within the AST area. Mr. Hauptman agreed with the cancellation of resampling of all surface soil samples. HLA notes that the 5 surface soil samples (3 resampled locations, 2 new locations) shipped to the laboratory prior to the May 30 conversation have been analyzed for TCL VOCs.

If you have any questions regarding this, or any other project matter, please do not hesitate to contact either of the undersigned.

Yours very truly,

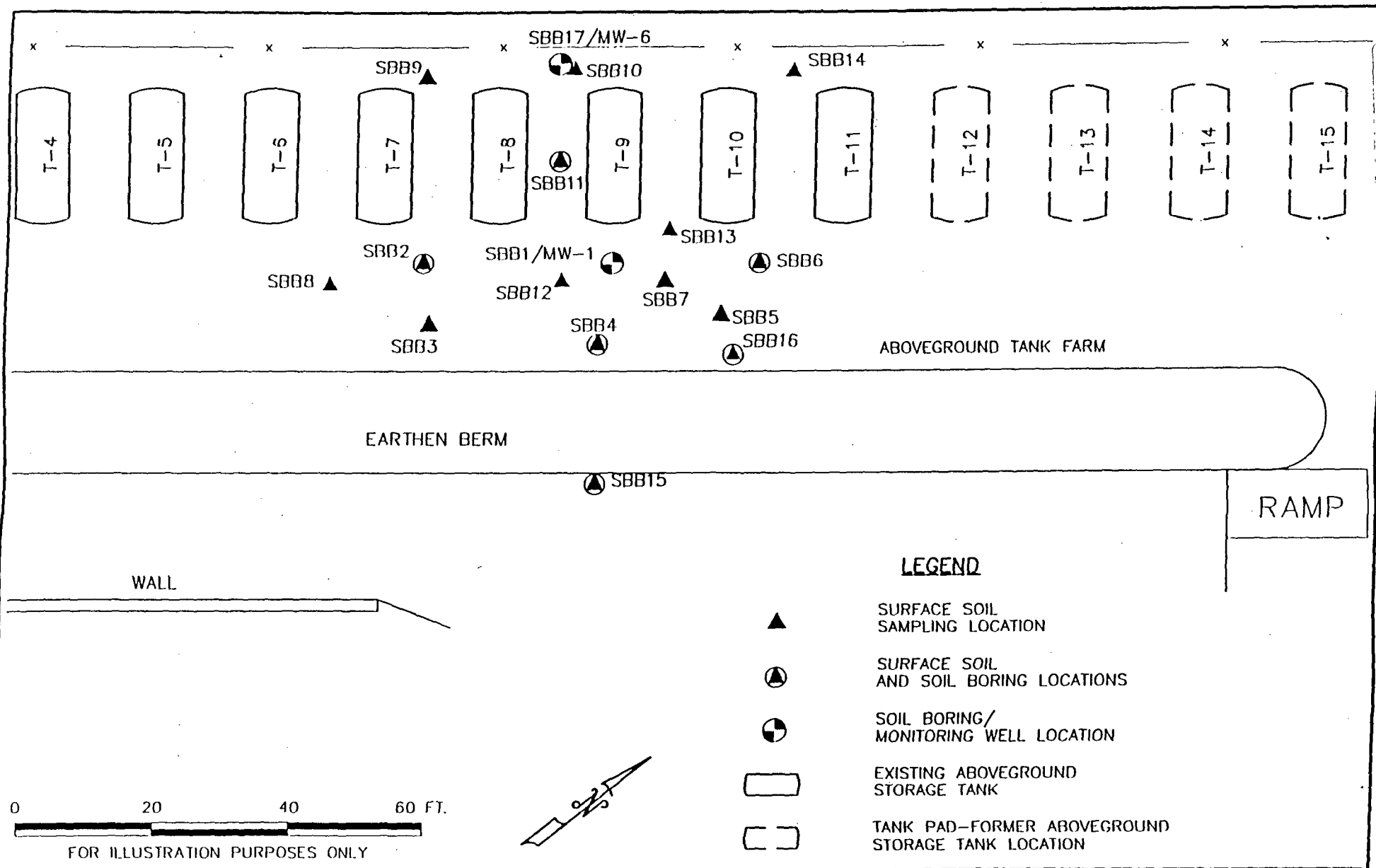
HARDING LAWSON ASSOCIATES


John S. Virgie, P.G.
Senior Geologist


Edward A. Nemecek, R.G., C.P.G.
Principal Hydrogeologist

Enclosure: Figure 1
JSV/EAN/jsv
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cc: Lori G. Singer, Esq., Sills, Cummis, Zuckerman, Radin, Tischman, Epstein & Gross
Ms. Pamela J. Philip, CDM Federal Programs Corp.



SOURCE:
PROPOSED ICC SOIL SAMPLING LOCATIONS BY
ENVIRO-SCIENCES, INC. DATED: 6/19/86 AND
SITE MAP, V. CHEMICAL, ST. CROIX, U.S.V.I. BY
NUS CORPORATION DOCUMENT U2-9101-04-SI,
UNDATED



Harding Lawson Associates
Engineering and
Environmental Services
131 North Third Street
Philadelphia, PA 19106
215-627-4505

DRAWN JOB NUMBER
WGA 35241.6

**SURFACE SOIL SAMPLE
SOIL BORING LOCATIONS**
AST AREA
ISLAND CHEMICAL COMPANY
ST. CROIX, U.S. VIRGIN ISLANDS

APPROVED
DCK

DRAWING NUMBER
35241A01

DATE
6/14/96

REVISED DATE

FIGURE
1