



September 29, 1994

IT Project No. 409440

Ms. Caroline Kwan
U.S. Environmental Protection Agency
Region II
26 Federal Plaza, Room 737
New York, NY 10278

Comments on Endangerment Assessment
Tutu Wells Site, St. Thomas, U.S. Virgin Islands
Prepared by CDM Federal Programs Corporation for USEPA

Dear Ms. Kwan:

On behalf of L'Henry Inc. please find enclosed comments on the above referenced document. These comments are provided for your information and are limited to how specific data have been utilized (or not utilized).

Thank you for the opportunity to provide comments. If you have any questions, please call Nancy D'Anna, Esq., or me.

Sincerely,

Belinda Price

Belinda K. Price, R.P.G.
Project Manager

Enclosure

cc: N. D'Anna, Esq.
J. McBurney, de maximus inc.

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Comments on:
Endangerment Assessment Tutu Wells Site
St. Thomas, Virgin Islands
Prepared by CDM Federal Programs Corporation for USEPA

Comments prepared by IT Corporation for L'Henri Inc.

1. Section 2.0. Data included in the Endangerment Assessment does not include data collected as part of the Remedial Investigation including: data collected by Geraghty and Miller on behalf of TEIC and data collected by other consultants on behalf of various PRPs. This data has been compiled by Geraghty and Miller and can be obtained from them. Summaries will be included in the Tutu Wells site RI.
2. Page 23, paragraph 3. Three surface soil samples are listed as being collected from the O'Henry dry cleaners in June 1989. This is incorrect. Sample e02-03 was a surface soil sample, however, samples e02-01 and e02-02 were listed as subsurface samples from the same location as e02-03. e02-01 was collected from a depth of 0.5 to 1.5 feet and e02-02 was collected from a depth of 1.5 to 2.5 feet.
3. Page 24. The description of groundwater samples collected at O'Henry dry cleaners by IT Corporation is incorrect. Two rounds of groundwater samples were collected from each of four monitoring wells therefore there are a total of eight samples, not seven as listed. In addition the samples were analyzed for VOCs using CLP protocol. Further, samples of the purge water were collected for analysis for appropriate disposal. These were the samples analyzed using EPA method 601/602. These purge water samples should not be included in any analysis of risk.
4. Table 2-6. See comment 2 above regarding the fact that sample e02-02 is not a surface soil sample. In addition, sample e-01 is listed as containing 440,000 ug/kg tetrachloroethene. This is incorrect. The compound is listed on the certificate of analysis as tetrachloroethane. This appears to be an isolated detection of this compound since it is not detected elsewhere on the O'Henry site.