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RCRA Review of Proposed Plan for Tutu Wells Site, Virgin Islands

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The Tutu Wells were historically used as a potable water supply source. Through the presence of UST's located at several service stations, auto recycling operations, and dry cleaning establishments, the ground water has become contaminated with BTEX and chlorinated solvent compounds located in a plume approximately 108 acres in size. Chlorinated VOC's and BTEX compounds exceed EPA maximum contaminant levels in the ground water. An Administrative Order (AO) issued by EPA required ground water monitoring and placement of residents affected by contamination on a public water source. The preferred alternatives for addressing groundwater/soil contamination in the area include excavation and disposal of contaminated soil, soil vapor extraction, deed restrictions related to ground water use, hydraulic containment, and treatment/discharge of ground water to beneficial reuse. HWFB concurs with the preferred alternative.

RCRA standards specify source control and treatment of the ground water and other media to below health based levels. The preferred alternative offers the option of continued treatment until MCLs are met for the aquifer, although a time frame for meeting MCLs is not specified.

Any waste that is found to be RCRA hazardous during any subsequent remediation activities, must be managed in accordance with RCRA standards. The Record of Decision should identify permitted RCRA facilities which will be used for the disposal of RCRA classified waste. A temporary unit may be needed to store the waste pending final disposal arrangements due to the small number of RCRA facilities in the Virgin Islands. All RCRA waste must be shipped in accordance with Department of Transportation requirements and be manifested in accordance with RCRA regulations.

Please contact Mike Kramer at 637-4165 if you have any questions concerning this matter.

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