

March 10, 1994

Ms. Caroline Kwan
USEPA - Region II
26 Federal Plaza, Room 737
New York, NY 10278

Re: Revised Schedule, Phase II Remedial Investigation, Tutu Wells Site St., Thomas, U.S.
Virgin Islands

Dear Ms. Kwan:

On behalf of Ana Gloria Ramos, Designated Coordinator for the Tutu Environmental Investigation Committee (TEIC), Geraghty & Miller, Inc. has prepared this letter to inform you of some of the difficulties being encountered in gaining site access to conduct Phase II Remedial Investigation (RI) activities at the Tutu Wells Site located in St. Thomas, U.S. Virgin Islands, and the resulting need to revise the project schedule. As an overview, access to more than 15 properties in the Tutu area is required to complete the proposed site inspection, soil-gas survey, and monitoring well installation activities. To date, only four of the needed access agreements have been signed and received. From the end of December through the present, the TEIC and Geraghty & Miller have undertaken a consistent, diligent effort to identify and contact the various property owners to expedite access approval. A summary of our progress and the impacts to the proposed implementation schedule is presented below. A revised schedule is attached.

Site Access

- During the period of December 27 through January 14, 1994, Geraghty & Miller prepared site access agreements for the properties where site inspections, soil-gas surveys, and well installation activities are proposed. Through research of records at the tax assessor's office, Geraghty & Miller identified the property owners and obtained copies of the deeds required for completion of the Earth Change Permit application. The site access agreements were delivered by two methods (via certified mail and in person) to the individual property owners on January 14, 1994.
- In a few cases, where property owners could not be identified from tax assessors records, Geraghty & Miller representatives visited the site. Through inquiries,

Geraghty & Miller attempted to identify the property owner and/or their representatives.

Earth Change Permit

- The Earth Change Permit application was completed and transmitted to the Department of Natural Resources (DPNR) on January 23, 1994.

Soil Gas Surveys

- Due to prolonged site access agreement review by the Virgin Island Department of Justice, site access approval to conduct the site inspection and soil gas survey at the Curriculum Center (former LAGA building) was not received until February 17, 1994. As a result, the soil gas survey commenced on February 28, 1994. Similar delays have been encountered in finalizing the access agreement with the Virgin Islands Housing Authority (VIHA). Site access approval was finally obtained from the VIHA on March 4, 1994. The field crew has now mobilized to the VIHA property to conduct the soil gas survey. As a result of the time required to obtain access approval, a delay of 4 weeks will be incurred in the performance of the soil-gas surveys. It is currently anticipated that the site inspections at VIHA and the Curriculum Center will be completed by March 25, 1994.
- The soil-gas survey report will be submitted to USEPA for review on approximately March 21, 1994.

Site Inspections

- Access agreements are still pending for most of the subject properties. Site inspections for the Curriculum Center and VIHA (where access approval has been received) will be performed during the week of March 14 or 21, 1994. The remaining site inspections will be implemented following receipt of individual site access approvals.

Monitoring Well Installation

- DPNR approval of the Earth Change Permit application is expected by March 10, 1994. Site access approval is still pending for two or three of the subject properties. Additional issues associated with subcontracting of the driller have also incurred delays to the drilling schedule. On February 24, 1994, the drilling

subcontractor's insurance company refused to issue a certificate for general liability coverage for this project in St. Thomas. Another insurance carrier had to be identified and solicited to provide general liability insurance. This took until March 2, 1994 to resolve. In the meantime, the shipment of materials to St. Thomas was delayed due to rescheduling of barge reservations. The driller would not commit to payment of rental and barge shipment of equipment and supplies until the required insurance was in place and a contract could be executed. Two barge departures are now planned for March 16 and March 23, 1994. An executed contract with the driller was received on March 4, 1994. Initiation of the monitoring well installation task may begin with preliminary activities on March 23, 1994, including initial set-up, steam cleaning, and health and safety orientation. Drilling of Monitoring Well MW-21D (at the Benjamin Oliver School) will begin on the morning of March 24, 1994. Drilling of Monitoring Well MW-18 at night will begin at approximately 11:30 p.m. on March 24, 1994. Four Winds Plaza has requested that this well be drilled at night to avoid disrupting traffic at the plaza.

Attached is the revised Phase II Remedial Investigation Implementation schedule. The revised schedule shows the TEIC's and Geraghty & Miller's effort to minimize the delay of the submission of the final RI Report and the draft Feasibility Study, in spite of the delays in gaining access to begin the field work. The overall delay in the project will be minimized by condensing the monitoring well drilling program from 12 weeks to 9½ weeks and procuring 2-week laboratory turnaround time on groundwater sample analysis.

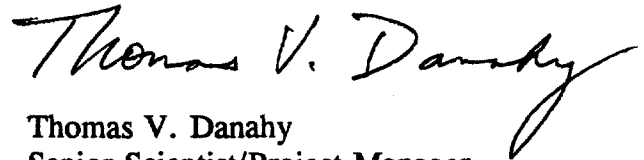
Data Validation

To expedite data analysis and report preparation, Geraghty & Miller asked USEPA to consider a reduction in the percentage of analytical data requiring data validation allowing this task to be accelerated by at least 1 week. Considering the existing supply wells have been sampled as many as eight times (each with 100 percent validation) and the 19 monitoring wells installed in the first phase of the RI have also had 100 percent validation, the percentage of groundwater analyses that undergo data validation could be reduced by validating only those sampling locations that have not previously undergone independent data validation. A telephone conference between Caroline Kwan (USEPA), Sally Odlund (CDM Federal Programs), and Thomas Danahy (Geraghty & Miller) was held on March 2, 1994 regarding Geraghty & Miller's request to reduce the data validation. At the end of this telephone conference, Ms. Kwan said she would check with her risk assessment and data validation personnel before making a decision. On March 9, 1994 Ms. Kwan informed Geraghty & Miller that 100% data validation would be necessary for risk assessment purposes. Accordingly, the revised project schedule does not illustrate any reduction of the Task-11 Data Validation.

We hope this revised schedule meets with your approval. If you have any questions or require further information, please contact one of us.

Sincerely,

GERAGHTY & MILLER, INC.



Thomas V. Danahy
Senior Scientist/Project Manager



Daniel A. Nachman
Vice President/Project Officer

c: Ana Gloria Ramos - TEIC
Paul Ryan - Texaco

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