



September 14, 1994

24231 2.C.5

Ms. Sherrel Henry
U.S. Environmental Protection Agency Region II
Emergency Remedial Response Division
26 Federal Plaza
New York, New York 10278

**Revised Draft Remedial Investigation Work Plan and Schedule
Island Chemical Company, Inc.
St. Croix, U.S. Virgin Islands**

Dear Ms. Henry,

Attached please find seven (7) copies of revised pages to be included in the above-referenced work plan. These pages are presented in response to your letter dated September 9, 1994.

As noted in our previous response letter, dated June 23, 1994, the requirement for analysis of potable water to be used during this project will increase the overall schedule by eight weeks (Comment No. 16). Please note that the analytical results forwarded to you under this schedule would be unvalidated. The project schedule presented in the draft work plan has been revised to include the potable water sampling, as well as presentation of project deliverables.

The draft Administrative Order on Consent (Order) dated August 4, 1994, contains numerous deadlines for project deliverables that are covered by the attached project schedule. Harding Lawson Associates (HLA) performed a critical path analysis of the deadlines specified. In some cases, the deadlines specified in the Order require deliverables be presented out of the typical sequence or prior to receipt of EPA comments on previous documents that would affect the preparation of the deliverables specified. Following are two examples of confusing deadlines that are required by the draft Order:

- The deadlines specified in the draft Order would require preparation of the draft Feasibility Study Report approximately two months before preparation of the draft Remedial Investigation Report. Such a requirement is contrary to typical Remedial Investigation/Feasibility Study programs. The information generated in the Remedial Investigation is needed to perform the Feasibility Study. Therefore the Remedial Investigation Report should be completed before the Feasibility Study begins.
- The deadlines specified in the draft Order would require presentation of the Baseline Risk Assessment prior to receipt of EPA comments on the Pathways Analysis Report. The attached schedule combines these two deliverables to allow for a single presentation by the Respondents and review by EPA. In this way, EPA can review the single deliverable and make comments which can be incorporated in the final report.

Because the approved schedule in the Work Plan is incorporated into the Order, the need for specific additional deadlines in the Order is unclear and, as illustrated by the examples above, confuses the overall schedule. HLA recommends that the following references to specific deadlines for deliverables

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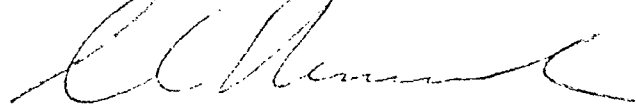
be deleted from the Order so that a single mutually agreed upon overall schedule may be followed for the entire project:

- Page 13, Section 28 C, second paragraph, first sentence. Delete the following sentence: *"Within 60 days of completion of field activities, Respondents shall provide EPA with a Data Summary Report ("DSR")"* ✓
- Page 14, first full paragraph. Delete the following phrase: *"Within fourteen (14) days after Respondents' submittal of the DSR"*
- Page 15, Section 28 E i, first sentence. Delete the following phrase: *"Within fifteen (15) days of submittal of the DSR,"* ✓
- Page 15, Section 28 E ii, first sentence. Delete the following phrase: *"Within thirty (30) days of submitting the Pathway Analysis Report to EPA,"* ✓
- Page 16, Section 28 F, first sentence. Delete the following phrase: *"Within sixty (60) days of EPA's approval of the baseline risk assessment report,"* ✓
- Page 16, Section 28 G, first paragraph, first sentence. Delete the following phrase: *"Within thirty (30) days after Respondents' submittal of the baseline risk assessment report to EPA,"* ✓
- Page 16, Section 28 G, second paragraph, first sentence. Delete the following phrase: *"Within fourteen (14) days after Respondent's submittal of the RAO and SOA report,"*
- Page 16, Section 28 H, first sentence. Delete the following phrase: *"...within thirty (30) days of the Task VII presentation to EPA,"* ✓

These changes are intended to limit confusion on the project. All of the deliverables described in the Order are included on the attached revised schedule. Copies of the attachments have also been provided as specified on the attached distribution page. If you have any questions regarding this, or any other project matter, please contact me at (609) 936-0700 or Jason Schindler at (215) 627-4505.

Yours very truly,

HARDING LAWSON ASSOCIATES



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

Principal Hydrogeologist

Attachments

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cc: Lori G. Singer, Esq., Sills, Cummis, Zuckerman, Radin, Tischman, Epstein & Gross
Jason M. Schindler Harding Lawson Associates

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Distribution
Island Chemical Company, Inc.
St. Croix, U.S. Virgin Islands

Number
of Copies

7 Copies (1 unbound)	United States Environmental Protection Agency Chief, Eastern New York/Caribbean Superfund Section II Emergency and Remedial Response Division United States Environmental Protection Agency 26 Federal Plaza, Room 747 New York, New York 10278 Attention: Virgin Island Chemical Site Project Coordinator
1 Copy	Chief, New York/Caribbean Superfund Branch Office of Regional Counsel United States Environmental Protection Agency 26 Federal Plaza, Room 437 New York, New York 10278 Attention: Virgin Island Chemical Site Attorney
1 Copy	Government of the Virgin Islands of the United States Department of Planning and Natural Resources Division of Environmental Protection Charlotte Amalie St. Thomas, U.S. Virgin Island 00802 Attention: Virgin Island Chemical Site Project Manager
3 Copies	Sills, Cummis, Zuckerman, Radin, Tischman, Epstein & Gross One Riverfront Plaza Newark, New Jersey 07102-5400
2 Copies	Harding Lawson Associates Philadelphia, Pennsylvania

5.9 Remedial Investigation Report

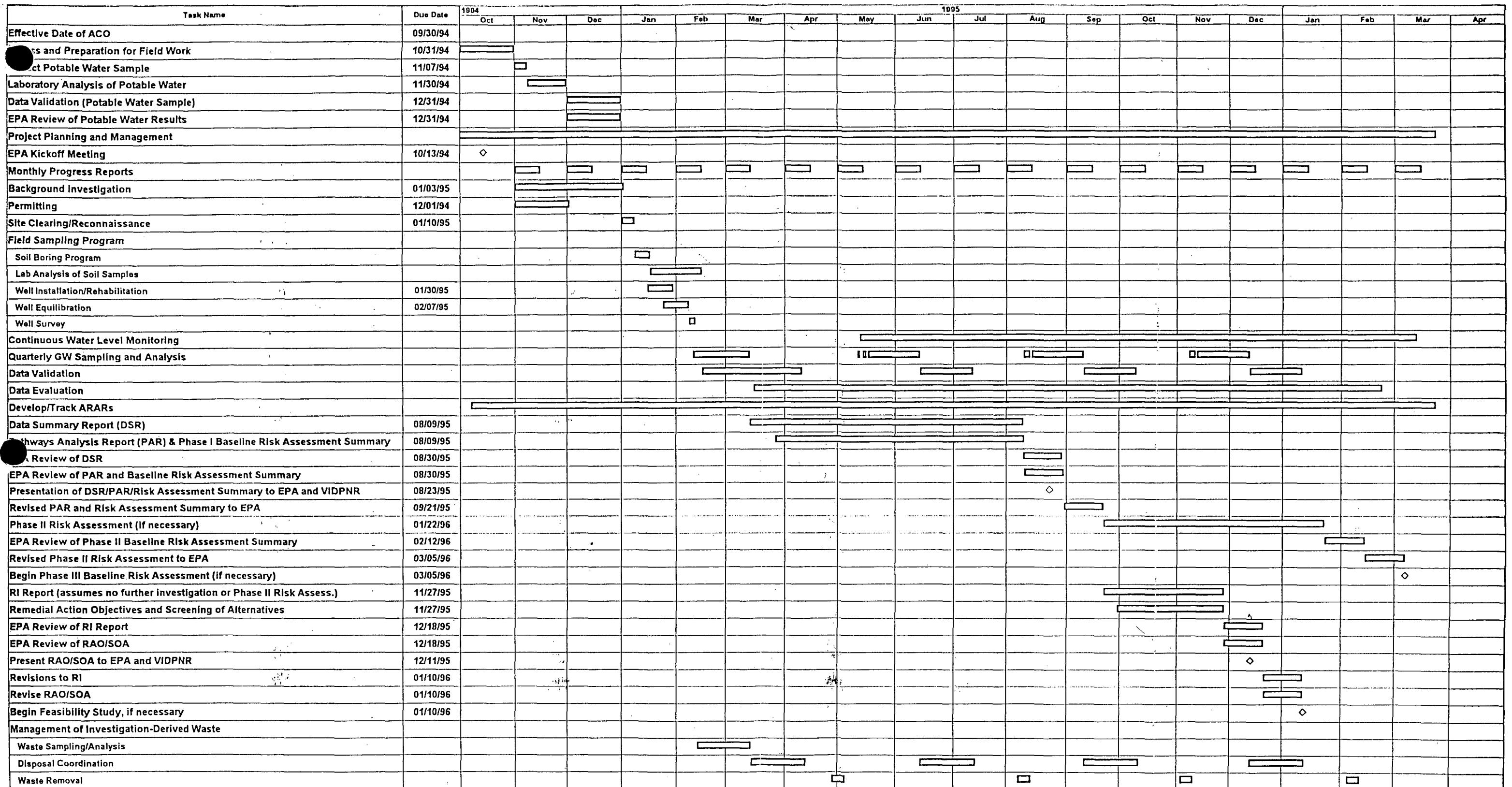
Following completion of all Remedial Investigation activities, a draft Remedial Investigation report will be prepared and submitted to USEPA. The Remedial Investigation report will include the following:

- Executive Summary
- Discussion of the history of the site;
- Summary of previous investigations and remedial actions;
- Description of the site including the physical setting, climate, surface water hydrology, geology and soils;
- Summary of sampling locations and procedures;
- Discussion of deviations, if any, from the RIWP;
- Tabulated summaries of soil and groundwater quality data;
- Data on groundwater flow direction;
- Nature and extent of contamination, if any;
- Contaminant fate and transport, if applicable;
- Summary of Baseline Risk Assessment activities;
- Listing of ARARs;
- Summary and conclusions; and
- Recommendations regarding identification of other potential sources of contamination in the vicinity of the site.

Appendices to the Remedial Investigation Report will include the following:

- Technical memorandum on field activities;
- Analytical data;
- QA/QC evaluation results; and
- Risk Assessment methods used.

After consideration of USEPA's comments, the report will be finalized.



Notes:

1. Schedule is based on months from approval of Consent Order and Work Plan
2. Schedule assumes final access agreements will be obtained within one month of USEPA approval. Schedule will require revisions if agreements cannot be obtained in this time frame
3. Assumes weather-related delays will not exceed 10 working days total.

Figure 8-1
Work Plan Implementation Schedule
 Island Chemical Company
 St. Croix, U.S. Virgin Islands

Revised September 19, 1994.