

LAW OFFICES OF
COON & SANFORD
P.O. BOX 25918
6 CHANDLER'S WHARF
SUITE 202
GALLOW'S BAY, ST. CROIX
U.S. VIRGIN ISLANDS 00824-0918

JOHN R. COON
MICHAEL J. SANFORD
WILLIAM S. H. CHAPMAN

809-773-3661
809-778-8104 FAX

October 8, 1993

VIA FEDERAL EXPRESS

Ms. Caroline Kwan
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza, Room 737
New York, New York 10278

Re: Notification of UST Closure/Removal for Western Auto
St. Thomas, US Virgin Islands

Dear Ms. Kwan:

Enclosed herewith please find our revised work plan for the removal of the two UST's located immediately to the rear of the Western Auto store on property owned by Four Winds Plaza. Please note that the work plan was revised in such a manner as to address each and every point raised in your correspondence of July 23, 1993.

It is presently the intention of Western Auto that tank removal efforts will commence on October 19, 1993. Formal notice of this removal was served upon other parties to the civil litigation in accordance with the provision of the Fourth Amended Case Management Order. All work will be performed in accordance with the enclosed Underground Storage Tank (UST) Closure Plan. Also

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please be advised that the enclosed plan was approved by the Government of the Virgin Islands of the United States, Department of Planning and Natural Resources, on August 31, 1993 (Permit #SST 005-93).

De Vira Corporation from Carolina, Puerto Rico, will be the contractor performing the actual removal under ENSR Environmental Consulting (ENSR) oversight. They were selected due to their distinguished reputation, high standards, and experience with this type of work in Puerto Rico and the Virgin Islands. In addition, samples of the contents of the tanks were taken on October 6, 1993, by representatives of ENSR, and in the presence of representatives of other PRP's. These samples are being analyzed now in order to determine if the contents of these tanks are hazardous prior to the commencement of the work described in the enclosed plan.

Again, it is important to note, as further outlined below, that the Removal/Closure Plan for Two Underground Storage Tanks, as originally forwarded to your office in draft form on July 15, 1993, has been substantially modified in response to your review letter of July 23, 1993.

With respect to the specific comments and concerns raised in your July 23, 1993, letter, the following explains how the enclosed revised Removal/Closure Plan addresses each concern.

Section 2.5.1 has been expanded to better address discharge of tank was water, testing with a Combustible Gas Indicator (CGI), use of dry ice, method for removal of tank contents, preparation of tanks for transport, venting procedures and tank disposal;

Section 2.5.3 addresses NHu operation, soils screening and trigger levels for determining acceptable backfill; and,

Section 2.6 has been clarified regarding procedures for split samples and soil sampling.

With respect to your "Comments on specific sections of the work plan":

Comments 1, 2, 3, and 4 have been fully incorporated into their respective sections;

Comment 5 - Section 2.5.3 has been clarified to better describe compaction requirements, soil screening methods and screening measurement (trigger) level.

The first paragraph of Section 2.5.3 has been redrafted to clearly indicate the nature of the headspace analysis procedure that will be performed during soil screening. The entire section has been redrafted to address your concerns, including defining the trigger level more explicitly.

With respect to your suggestion that background samples should be taken, please be advised that it is not our intention to take background samples from the parking lot at this time. In the unlikely event that laboratory analysis of the samples taken indicates the presence of hazardous substances, background samples would then be taken in an effort to determine the source. This would seem to be the most logical and certainly the most cost effective approach.

Comment 6 - Section 2.6 includes a detailed description of ENSR's sampling procedures:

Comment 7 - Appendix B/Health and Safety Plan: Corrections to Table of Contents and Page number references have been made;

Comment 8 - Soil sample collection and Tank grave entry have been addressed both in Section 2.6 of the Work Plan, and in Section 4.2.12 Entry into a Tank Grave, in the Health and Safety Plan;

Comment 9 - Section 5.0 has been clarified to indicate use of the HNu for screening soils inside the tank graves and the use of the CGI the presence of potentially explosive vapors inside the tanks.

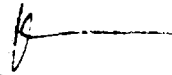
Western Auto regrets it is unable to supply the U.S. Environmental Protection Agency with the courtesy of a 30 day notice prior to the commencement of tank removal. Due to the

nature of the upcoming civil litigation surrounding this matter and the associated amended scheduling in the Fourth Case Management Order as recently signed by the Honorable Judge Stanley S. Brotman, it has unfortunately become necessary to expedite this process so that Western Auto can adequately defend itself in the civil suit.

Please understand, however, that Western Auto is making every attempt to comply with all EPA goals and comments. Thus if you have any question with respect to the enclosed, please do not hesitate to contact me so that I may immediately respond to your concerns.

Thank you for assistance and cooperation in this matter.

Very truly yours,


John R. Coon, Esquire
Attorney for
Western Auto Supply Company

Enclosure

cc: Andrew Praschak