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March 31, 1993

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

Re: Supplemental Response to Request for Information
Tutu Well Field Site
St. Thomas, U.S.V.I.

Dear Ms. Kwan:

The information set forth in this letter is intended to supplement the information provided in Western Auto's initial response dated March 1, 1993.

Preliminarily, it must again be stressed that the broad language of the EPA's requests requires an exhaustive search of company records for the entire time of the St. Thomas store's existence. There has not been sufficient time to conduct such a comprehensive investigation, and these supplemental responses are provided based upon the records that have been located to date. In addition, some of the information herein is based upon the memories of individuals of events which transpired some fifteen years ago. Therefore, the responses provided herein may not prove to be totally accurate and may have to be supplemented as additional information is discovered by Western Auto or is made available by individuals who have not yet been identified or located.

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Be that as it may, please be advised that Western Auto takes seriously its duties and responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"). A great deal of time and effort has been devoted to the obtaining of information necessary for meaningful responses to be provided. In addition, a great deal of energy has been devoted to learning about the Tutu Wells Site situation due not only to the EPA's investigation, but also due to the fact that law suits have been filed in the last month naming Western Auto as defendant in civil litigation stemming from the contamination of the Tutu aquifer.

The Virgin Islands DPNR has recently permitted the inspection and copying of many of their documents and scientific studies. We have also been provided with copies of various soil and gas surveys and studies performed for parties in the pending litigation. These studies may be listed as follows:

PROGRESS REPORT/TUTU SERVICE STATION SOIL VENT PROGRAM

Prepared for: Ms. Lizette Cortes
Environmental & Safety Coordinator
Texaco Puerto Rico, Inc.

Prepared by: Groundwater Technology, Inc.

DATE: October 13, 1988

SOIL PILES MONITORING/TEXACO SERVICE STATION

Prepared for: Texaco Puerto Rico, Inc.

Prepared by: Lebron Associates

DATE: November 10, 1988 (Test #4)

DATE: December 15, 1988 (Test #9)

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HYDROGEOLOGICAL ASSESSMENT OF RODRIGUEZ ESSO SERVICE STATION

Prepared for: Esso Virgin Islands, Inc.

Prepared by: Soil Tech Corporation

DATE: November 14, 1993

SAMPLING REPORTS

Prepared for: TEIC

Prepared by: Geraghty & Miller, Inc.

	<u>DATE OF TEST</u>	<u>DATE PREPARED</u>
1st	Sept. 1990	Jan. 1991
2nd	Feb. 1991	May 1991
3rd	June 1991	Sept. 1991
4th	Oct. 1991	Jan. 1992
5th	Feb. 1992	May 1992
7th	Sept. 1992	Dec. 1992

SOIL GAS SURVEY

Prepared for: Jack Dema

Prepared by: Target Environmental Services, Inc.

DATE: February 1992

TECHNICAL MEMORANDUM I

Prepared for: TEIC

Prepared by: Geraghty & Miller

DATE: April 10, 1992

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CARIBBEAN HYDRO-TECH, INC.

Prepared for: John Dema

DATE: November 28, 1992 - December 12, 1992

We have had these studies reviewed by outside consultants who are generally considered experts in fields pertinent to the subject matter of both the EPA investigation and the pending litigation. While certainly more work and additional time are needed before any firm opinions can be rendered, preliminary feeling is that Western Auto could not have contributed to the contamination of the aquifer by the release of chlorinated solvents of the type set forth in the EPA's Request for Information No. 1, i.e. TCA, TCE, DCE, PCE, or MEK.

As you will note from Western Auto's response to Request no. 1 below, very few of the products known by Western Auto to have been used in the garage bay areas of the St. Thomas store contained chlorinated solvents of any type. Of the three products that did contain these substances, two were aerosol brake products that would have been sprayed directly onto brake shoe surfaces, resulting in negligible product deposited on the ground. When aerosol cans were emptied, to the best of Western Auto's knowledge, they were placed in a nearby dumpster which was regularly emptied and the contents transported to relevant landfills by a commercial trash hauler. The other product was a rarely used tire repair cement that also would have been directly applied to the surface of a tire. Again, this is a seldom used product that would not have found its way either onto the ground or into underground storage tanks. Containers, when empty, were placed into the dumpster and removed.

Furthermore, numerous soil and liquid test samples were taken during November and December, 1992, in the area adjacent to Western Auto's service bays by Caribbean Hydro-Tech, Inc., under the supervision of the Virgin Islands Department of Planning and

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Natural Resources. These studies indicate that no chlorinated solvents were found in any of the soil samples taken from the vicinity of Western Auto. The only indication of the presence of any solvents was reported in a Report of Results dated December 12, 1992 from Savannah Laboratories and addressed to Caribbean Hydro-Tech. This report noted the presence of 1,1,1 trichloroethane ("TCA") at a concentration of 700 ug/l in an underground fuel tank located immediately adjacent to the Western Auto service bays. Significantly, no TCA has ever been found in either the soil or water surrounding the underground tanks. Even more significantly, since this sample was so at variance with other samples taken in the vicinity of Western Auto, Caribbean Hydro-Tech resampled liquid from this tank on March 12, 1993, and submitted this sample to another qualified laboratory for the performance of EPA analysis 601 and 602. The results of this subsequent analysis confirmed that the first sample analysis had been erroneous and further confirmed that no chlorinated solvents or hydrocarbons were found in the tank above detectable limits.

Thus to Western Auto's knowledge no objective evidence exists that might link Western Auto's St. Thomas store to the release of any of the chlorinated solvents set forth in the EPA's Request no. 1. Indeed the facts set out above clearly show that Western Auto could not have contributed any volatile compounds into the Tutu Wells site. Despite this fact, Western Auto is willing and stands ready to immediately undertake whatever procedure is necessary to remove the existing underground storage tanks under the strict supervision of the EPA and the Virgin Islands Department of Planning and Natural Resources, so long as removal is also approved by the U.S. District Court as part of the ongoing litigation. In addition, Western Auto would propose that soil and water samples be taken from a location immediately underneath these tanks and analyzed by a qualified laboratory for the presence of chlorinated solvents. These results would of course be shared with the EPA and the DPNR. It is Western Auto's considered position that in this manner any questions with respect to its role in this matter can be immediately and conclusively determined, very likely saving Western Auto and the federal government the time and expense of erroneously being

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designated as a party potentially responsible for the contamination and clean-up of the Tutu Wells Site.

SUPPLEMENTAL RESPONSES TO
EPA'S REQUEST FOR INFORMATION

1. Western Auto has conducted a reasonable investigation into the issue of the identity of products used in the service area of its St. Thomas facility from the time that it began operations in approximately 1978 or 1979 to the present. It has spoken with employees and reviewed deposition testimony of employees and former employees in an attempt to obtain a reliable list of products used in the St. Thomas store. This list is set forth below. Material Safety Data Sheets for these products are attached hereto as attachment "A". The chemical composition and source of origin of each of the products listed below are set forth, to the extent known by Western Auto, on the attached data sheets.

The list below does not include products which may be used in other Western Auto stores in the United States for the reason that the language of this request asks only for information related to St. Thomas. Western Auto has a compilation of Material Safety Data Sheets for products used throughout the United States in its many differing service facilities. This compilation is part of Western Auto's Hazard Communication Program and, even though its scope encompasses additional products used in facilities other than St. Thomas, a copy of this manual will be provided to the EPA upon request of the undersigned in the event that the EPA deems it relevant.

The list below also does not include products sold at retail in the retail section of the store. These products are sold to the public as opposed to being used in the service area and should not be a factor in this investigation. Again, however, if the EPA desires information concerning retail products, every effort will be made to forward such information in an expedited manner.

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Finally, request no. 1 seeks specific information with respect to products containing the chlorinated solvents designated therein. Please be advised that the list below contains three such products: Brake Cleaner (Aerosol) (attached MSDS no. 199), Solder Seal/Gunk Disc Brake Quiet (Aerosol) (attached MSDS no. 234), and Universal Cement (attached MSDS no. 718).

Brake Cleaner (Aerosol) is an aerosol spray product that is sprayed on brake shoes in order to facilitate their cleaning. After application, any excess is wiped away with a rag and the rag is discarded into a nearby dumpster. According to the information on the MSDS, this product contains perchloroethylene. It is stored in its original product container prior to use. Once the container is empty, it is placed in a dumpster where to the best of Western Auto's knowledge it is periodically disposed of by a commercial trash hauler. On information and belief, this product is never stored in tanks or used in any manner which might result in the product being deposited on the ground or in any storage tanks or vessels.

Similarly, Disc Brake Quiet (Aerosol) is also an aerosol product that is sprayed directly on brake shoes. Any excess is wiped off with a rag and the rag is discarded into the dumpster. The attached MSDS indicates that it contains approximately 5% methyl ethyl ketone. This product is stored in its original container until it is needed. As above, when the container is empty, it is placed in the dumpster and periodically removed. This product is never stored in tanks and, due to the fact that it is applied as above in aerosol fashion directly on the brakes, it is unlikely that it could ever be deposited on the ground or in underground tanks.

Universal Cement is a clear liquid cement that is on rare occasion used to repair tires. The MSDS on this product indicates that it contains 1,1,1 trichloroethane. It should be noted that investigation done subsequent to the submission of Western Auto's first response to this request for information has revealed that the St. Thomas Western Auto store is not in the tire repair business. It is, however, sometimes called upon to repair those tires originally sold by it for customers who bring those tires in for repair. The St.

Thomas store may repair five tires per month. Universal Cement is used on a small percentage of these tire repairs. It is stored in its original container. When needed, it is applied directly to the tire. It is then discarded into the dumpster as described above. Given the direct nature of the application of this substance, it is not likely that it could have been deposited on the ground or in any underground storage tanks.

The list of products used in the service area of the St. Thomas Western Auto facility, compiled as described above, is therefore set forth as follows:

- a) Good Hand Cleaner (MSDS # 715)
- b) Havoline Formula 3 Motor Oil, SAE 20W-50 (MSDS #764)
- c) Blue Coral Clean-Up (MSDS # 816)
- d) Valvoline Petroleum Grease (MSDS #851)
- e) Havoline Formula 3 Motor Oil, SAE 5W-30 (MSDS #894)
- f) Stanlux Tire Lubricant (attached)
- g) Havoline Formula 3 Motor Oil, SAE 30 (MSDS #536)
- h) Havoline Formula 3 Motor Oil, SAE 10W-40 (MSDS #535)
- i) Havoline Formula 3 Motor Oil, SAE 10W-30 (MSDS #534)
- j) Havoline Formula 3 Motor Oil, SAE 40 (MSDS #505)
- k) Quaker State FLM Automatic Transmission Fluid
(MSDS#129)
- l) Gumout Carburetor and Fuel Injector Cleaner
(MSDS #321)
- m) 450 Brake Fluid (MSDS #238)
- n) Gunk Brake Cleaner (aerosol) (MSDS #199)
- o) WD-40 (aerosol) (MSDS #141)
- p) Quaker State QSX Performance Motor Oil, SAE 20W-50
(MSDS #13)
- q) Quaker State Deluxe Motor Oil (5W-30, 10W-40,
20W-50) (MSDS #130)
- r) Quaker State Super Blend Motor Oil (10W-30,
20W-40) (MSDS # 127)
- s) Quaker State HD Motor Oil (10W, 20W-20, 30, 40)
(MSDS # 126)
- t) JF92 Petroleum Lubricating Oil (hydraulic jack oil)

(attached)

- u) Henkel Rubber Cement (attached)
- v) Engine Brite Engine Cleaner (aerosol) MSDS #220)
- w) Disc Brake Quiet (aerosol) (MSDS #234)
- x) Universal Tire Repair (MSDS #718)

2. Please see the response to request no. 1 above as to those products which contain chlorinated solvents. With respect to the balance of the products identified above, the following summary is provided:

a) Good Hand Cleaner

Currently used in the garage service area.

Storage - stored in original container that product was purchased in.

Handling - product is used to clean hands.

Disposal - Product is used to wash hands and flows into sink washroom drain. Container is discarded into dumpster when empty.

b) All Havoline and Quaker State Motor Oils - All weights

Not in current use in the garage service area. Based on deposition testimony of current and former Western Auto employees, oil changes were only performed during the period of approximately 1979 - 1981.

Storage - unused oil was stored in the original container the product was purchased in

Handling - oil was used to fill crankcases of vehicles

Disposal - to the best of Western Auto's knowledge, based on deposition testimony, the waste oil was either placed in an underground waste oil tank or in a drain that to the best of Western Auto's knowledge was connected to the underground waste oil tank.

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- c) Blue Coral Clean Up
Currently in use in the garage service area
Storage - Stored in the original container that the product was purchased in
Handling - used to absorb liquids and substances from garage floor
Disposal - disposed of in dumpster after use
- d) Valvoline Petroleum Grease
Currently not in use in the garage service area
Storage - stored in the original container that product is purchased in
Handling - used to lubricate vehicle chassis
Disposal - disposed of in the dumpster
- e) Stanlux Tire Lubricant
Currently in use in the garage service area
Storage - stored in the original container that product is purchased in
Handling - used in the process of mounting tires
Disposal - disposed of in dumpster
- f) Quaker State FLM Automatic Transmission Fluid
Not currently in use in garage service area
Storage - stored in the original container that product is purchased in
Handling - used to fill vehicle transmissions
Disposal - disposed of in dumpster
- g) Gumout Carburetor and Fuel Injector Cleaner Storage
Not currently in use in the garage service area
Storage - the product was stored in the original container that the product was purchased in
Handling - used to clean the inside of carburetors and

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fuel injection

Disposal - disposed of in the dumpster

h) 450 Brake Fluid

Currently in use in the garage service area

Storage - stored in the original container that the product was purchased in

Handling - used in servicing vehicle brakes

Disposal - disposed of in the dumpster

i) WD-40 (aerosol)

Currently in use in the garage service area

Storage - the product was stored in the same container that the product was purchased in

Handling - the product was sprayed on screws, nuts, etc. to loosen

Disposal - disposed of in the dumpster

j) Petroleum (vehicle jacks) Lubricating Oil (hydraulic oil)

Currently in use in the garage service area.

Storage - stored in the original container that the product was purchased in

Handling - used to grease the hydraulic jacks for lifting vehicles

Disposal - empty container are disposed of in the dumpster. Any oil on the garage floor is soaked up with Blue Coral clean up and disposed of in dumpster.

k) Henkel Rubber Cement (Tire repair kit)

Currently in use in the garage service area.

Storage - stored in the original container that the product was purchased in.

Handling - used in the process of repairing tires.

Disposal - empty containers are disposed of in the dumpster

l) Engine Brite Engine Cleaner (aerosol)

Currently in use in the garage service area.

Storage - stored in original container

Handling - product is aerosol delivered. It is used to clean off equipment in service area. To the best of Western Auto's knowledge, product was not used on customer's cars.

Disposal - When used, excess is wiped off with rags and rags are put in dumpster. Empty containers are put in dumpster.

m) Gunk Disc Brake Quiet

See the response to Request No. 1 above.

Currently in use in the garage service area.

Storage - stored in the original container the product was purchased in.

Handling - used to spray on disc brakes to stop squeaks

Disposal - disposed of in the dumpster

n) Gunk Brake Cleaner

See the response to Request No. 1 above.

Currently in use in the garage area.

Storage - stored in the original container the product was purchased in.

Handling - used to clean brake pads.

Disposal - disposed of in the dumpster.

Western Auto is unaware of and to the best of its knowledge does not have in its possession any manifests, invoices or other documentation responsive to this request.

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3. Yes. Western Auto has continued its attempts to ascertain the nature of the mechanical repairs performed at its St. Thomas store since it opened. Most of the repair functions set forth in Western Auto's preliminary response have been verified. The one exception is the nature and extent of tire repairs performed at the facility. As described above in response to request no. 1, tire repairs are not performed on a daily basis. They are in fact performed approximately 2 - 5 times per month for customers who have purchased Western Auto tires. New tire installation is routinely performed.

4. Please see the responses to request nos. 1 and 2 above.

5. Please see the responses to request nos. 1 and 2 above.

6. Western Auto's investigation is continuing. At this time no information other than that set forth in its preliminary response has been obtained.

7. It is believed that there was an oil/water separator in the service area. This has not been confirmed. Its location is undetermined. This response will be supplemented as more facts are learned during investigation.

In addition to the waste oil tank referred to in Western Auto's previous response to this request, information received from reports done by Caribbean Hydro-Tech indicate the existence of an underground fuel tank located in the driveway adjacent to the Western Auto service area in the rear of the store. It is thought that this tank may have stored fuel for the store's generator. A drawing received by counsel for Western Auto from Caribbean Hydro-Tech purporting to depict the location of the two underground tanks is attached hereto as Attachment "B". Again, their precise location, design, and condition has not been ascertained to date by Western Auto.

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8. It is now believed that it is unlikely that these substances could have entered or been deposited into the underground storage tanks for the reasons set forth above.

9. Western Auto's investigation is ongoing. Currently no new information has been uncovered that would provide any further response at this time.

10. Western Auto is still without knowledge as to how the removed substances were handled or disposed of.

11. Other than as provided in response to request number 7 above, Western Auto has no information which would tend to supplement the prior response. Western Auto continues to investigate this matter and this response will be supplemented as new information is received. Western Auto does believe, as stated above, that no release or discharge from its tanks has occurred.

12. No new information has been discovered to date which would alter or amend the prior response to this request.

13. To the best of Western Auto's knowledge, no such outfall or discharge exists at the Western Auto leased premises.

14. Other than the information provided above in response to request number 7, and the information gleaned from the Caribbean Hydro-Tech studies as recently as March 29, 1993, discussed in the preamble to these responses, no new information has been discovered that would alter or amend Western Auto's prior responses.

15. Other than the information set forth in response to request nos. 1 and 2 above, Western Auto does not know whether any hazardous substances were disposed of in the manner indicated.

16. See the responses to request nos. 1 and 2 above. Other than the information provided therein, Western Auto has no new information with respect to this request. Western Auto will supplement this response as new information becomes available.

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17. It is believed that the above-ground tank was installed in approximately 1985. This has not been verified. Records pertinent to this installation have yet to be located. The tank contains diesel fuel for use by the store's auxiliary generator.

18. Western Auto has no knowledge pertinent to any cistern or catchment systems located at the leased Western Auto premises.

19. Western Auto has no new information with respect to this request.

20. Not applicable.

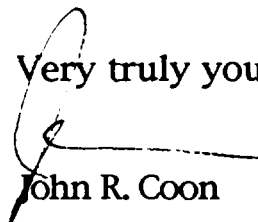
21. No.

22. Western Auto has no new information which might tend to supplement its previous response to this request.

23. Western Auto is still gathering and reviewing pertinent documents. Western Auto has no new information which might tend to supplement its previous response to this request.

24. Western Auto is still attempting to locate and analyze pertinent insurance contracts. Western Auto has no new information which might tend to supplement its previous response to this request.

Very truly yours,



John R. Coon

JRC/jmeg

cc: Andrew L. Praschak, Esquire
Barry Huffman