

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

DATE: MAR 31 1999

SDMS Document



115587

SUBJECT: Virgin Islands Chemical Site, St. Croix, USVI
Compliance with the National Historic Preservation ActFROM: Grace Musumeci, Chief *Grace Musumeci*
Environmental Review SectionTO: Caroline Kwan, Remedial Project Manager
Sediments/Caribbean Team

This is a follow up to my February 18, 1999, comment memorandum concerning the Draft Remedial Investigation for the above-referenced site. In particular, Comment No. 4 of that memorandum requested that any available aerial photographs of the site be made available to assist us in determining whether a cultural resources survey is needed to assist in ensuring that EPA's actions at the site comply with the requirements of the National Historic Preservation Act (NHPA).

Subsequently, you provided my office with the April 1987 Site Analysis report prepared by EPA's Environmental Photograph Interpretation Center, which includes historical aerial photography of the site for the period between 1954 and 1977. Our review of the photographs contained in the report, together with the information contained in the draft RI report, indicates that much of the site's surface and subsurface was extensively disturbed during the process of constructing the buildings and facilities which currently occupy the site. Further disturbance undoubtedly occurred as a result of the various soil contaminant removal actions which have already been completed.

Notwithstanding the advice contained in the Virgin Islands State Historic Preservation Officer's (SHPO's) May 20, 1994 comment letter, and in light of the extensive disturbances which have occurred to those areas of the site associated with construction, operation, and cleanup of the facility, we do not believe that preparation of a cultural resources study of the area is warranted at this time because it appears that remedial actions are likely to affect only previously disturbed areas. In the future, however, if it becomes necessary to implement additional remedial actions either outside the site (e.g., in or near any of the nearby intermittent streams) or in any areas of the site or adjacent areas that have not already undergone significant surface disturbance, to ensure compliance with the NHPA's requirements, it will be necessary, at a minimum, to perform a Stage 1A+B cultural resources survey, consistent with the SHPO's comments.

If you have any questions concerning the above comments, please contact William Lawler of this office, or John Vetter, EPA Archeologist, at 7-3728 and 7-3739, respectively.