

**AUG 02 1995**

Tutu Wells Site  
Proposed Plan

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We have reviewed the Proposed Plan for the Tutu Wells site for issues related to environmental resources, and offer the following comments.

The section on Preferred Alternative indicates that the preferred alternative "will comply with ARARs." However, it is not clear how the proposed remedy addresses the location-specific ARARs-concerns that we raised in our April 6, 1995 review memo.

- **Endangered Species Act**

The U.S. Fish and Wildlife Service's (FWS) July 25, 1995 response to our June 30, 1995 follow-up informal consultation on ESA indicates that "the endangered Virgin Islands tree boa Epicrates inornatus granti and the plant Zanthoxylum thomsonianum might be found in the proposed project location"(see Attachment). We are working with FWS to determine how best to address this issue.

- **National Historic Preservation Act**

We are in the process of determining whether the site is sensitive to the presence of cultural resources. We will inform you of the outcome of our determination as soon as possible.

- **Executive Order 11988 - Floodplain Management**

Since all CERCLA/SARA actions are "critical actions," remediation at Superfund sites requires the consideration of both 100-year and 500-year floodplains. Accordingly, a 100-year and 500-year floodplain delineation needs to be done for the site in order to comply with the E.O. 11988. To the extent practicable, any remedial facilities should be either outside of such contours, or adequately protected from flooding.

Thank you for this opportunity to comment. We look forward to working with you as this project progresses. If you have any questions, please contact Bob Witte at x3519.

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