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June 18, 1992

Ms. Caroline Kwan
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

PROJECT: TES V, EPA CONTRACT NO: 68-W9-0002
Work Assignment C02048
Tutu Well Field Site
St. Thomas, U.S. Virgin Islands

DOCUMENT NO: TESV-C02048-EP-CMQV

SUBJECT: Samples for Surface Soil Risk Assessment
Tutu Service Station Investigation

Dear Caroline:

This letter is to inform you of the results of my discussion with Mark Maddaloni of EPA on June 16 concerning the risk assessment for surface soils at the Tutu Wells Site in the U.S. Virgin Islands. It is Mark's understanding that the wording in the National Contingency Plan (NCP) implies that any risk assessment performed during a CERCLA remedial investigation should be quantitative, even if the pathway is not expected to be major. While a quantitative evaluation can technically be performed on data from a single sample (or from five samples as currently in the Tutu scope), the reliability of the assessment increases with a greater number of samples.

In this light, we discussed surface soil data needs for the Tutu investigation. We discussed obtaining additional data from the uppermost split spoon of investigation borings, but most of these are located in paved areas. I also mentioned that validated surface soil data is available from previous investigations that EPA conducted in 1988 and 1989 as part of the 104(e) letter response investigation. Lists of the sample locations and the types of analyses performed are attached.

The eighteen surface soil samples were collected by CDM FPC from areas of suspected contamination on a number of area properties and are therefore biased towards worst case soil concentrations. Samples collected in 1988 were analyzed for Volatile Organic Analytes (VOAs), Pesticides/ Polychlorinated Biphenols (PCBs), total petroleum hydrocarbons (TPH), lead and chromium. Samples collected in 1989 were analyzed for VOAs, organic extractables (semi-VOAs), TPH and Extraction Procedures Toxicity Testing (EP Tox).

Please show these lists to Mark for his evaluation as to whether the addition of these samples would be suitable and sufficient for the investigation. If they are not and more samples are required, CDM FPC suggests that a surficial soil be collected from boring B-1 behind the Curriculum Building and that additional grab samples be collected from unpaved areas at the site.

Sincerely,

CDM FEDERAL PROGRAMS CORPORATION



Sally Odland
Work Assignment Manager

cc: Mark Maddaloni, EPA
Scott Graber, CDM FPC
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