

May 19, 1993

Mr. Leonard Reed
U.S. Virgin Islands Department of
Planning and Natural Resources
Nisky Center 8000, Suite 45
St. Thomas, U.S. Virgin Islands 00802

Re: Request for Waste Classification and Permission for Disposal

Dear Mr. Reed:

Pursuant to our recent telephone conversation and as a followup to my facsimile, enclosed is a copy of the March 2, 1993 letter to Caroline Kwan of the U.S. Environmental Protection Agency (USEPA). This letter describes the sampling procedures and results for the drilling cuttings from the Tutu Service Station Investigation. Geraghty & Miller believes this drilling material (which consists of soil and rock cuttings) should be classified as a non-hazardous solid waste because the Toxicity Characteristic Leachate Procedure (TCLP) and Resource Conservation and Recovery Act (RCRA) waste characteristic parameters were below limits for hazardous waste and within the limits of non-hazardous material.

As discussed with the USEPA and Clifford Crooke on April 28, 1993, this soil could be useful as daily cover for the Bovoni Landfill. The Tutu Environmental Investigation Committee (TEIC) would like to receive a letter from the Department of Planning and Natural Resources (DPNR) that confirms that this material is non-hazardous. Please direct your response to:

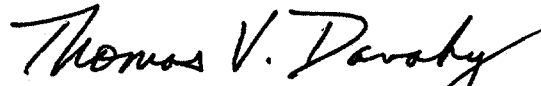
Ana Gloria Ramos
Designated Coordinator
Tutu Environmental Investigation Committee
P.O. Box 364269
San Juan, Puerto Rico 00936-4269

TUT 006 1506

Based on your response, the TEIC will implement the appropriate handling and disposal of these drilling cuttings. If you require any additional information, please do not hesitate to call. Thank you for your assistance in this matter.

Sincerely,

GERAGHTY & MILLER, INC.



Thomas V. Danahy
Senior Scientist/Project Manager



Daniel A. Nachman
Vice President/Project Director

c: Ana Gloria Ramos, TEIC
[REDACTED]
Clifford Crooke, DPNR
Adrian Shottroff, DPNR

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