



ENVIRONMENTAL PROTECTION
AGENCY, REGION II
1993 MAR 27 PM 11:30
ERRD SITE COMPLIANCE
BRANCH

3/30/93
S:11:00 AM
CK

March 24, 1993
VIA Federal Express

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

Dear Ms. Kwan:

I am enclosing the information requested in your letter. We have attempted to be as thorough as possible however we had just entered into a sublease for this building when we were first contacted by your agency. We had no prior association with this property or any of our predecessors who have leased or owned the facility. Our responses are based on the limited experience with the property. We began operations at this location in July 1992.

Thank you for your understanding, we are anxious to be of whatever assistance is possible. Please let me know if further information or documentation is necessary.

Sincerely,

R. Bradley Creger
President

Attachments

ANSWERS TO REQUEST FOR INFORMATION

ANTILLES AUTOMOTIVE

1. See the attached listing of products utilized or stored at the facility. All chemicals are stored in their commercial container and are purchased over the counter or via wholesalers.
2. The attached listing which reflects the products and their uses or applications.
3. General automotive repairs including oil changes.
4. Waste oil and antifreeze are stored on sight and are held in above ground containers pending pickup via the Virgin Islands Governments waste oil program.
5. See above
6. The facility generates 500 gallons of waste oil monthly. Oil is stored in an 10,000 gallon above ground tank. 15 gallons of coolant is generated per month. The antifreeze is stored above ground. No VI Government pickup has occurred since the company (Antilles) began performing automotive service at the facility in July 1992.
7. No oil water separation system is in use on the property. Upon information and belief there is no evidence of such a system ever being present at the sight. The waste oil storage tank was installed by the previous tenant TAG, Industries Inc. The tank is located in the service area and has a capacity of 10,000 gallons. (see diagram for question 14)
8. Antilles is unaware of any discharge and or waste oil to escaping from the above ground storage tank since the company began operations at the sight.
9. N/A
10. N/A
11. N/A
12. N/A
13. N/A

14. See attached plot plan

15. Antilles is unaware of any septic tank or underground tank on the property. Antilles has not determined that these systems were ever present on the property.

16. N/A

17. N/A

18. Antilles does not dispose of hazardous wastes in drains or sewers, or sinks. We are unaware of any such activities prior to beginning operations in July 1992.

19. No storage of wastes or products in addition to those stated in the answers to questions number 2 and 4.

20a. 10,000 gallon waste oil storage tank. Antifreeze is stored above ground.

20b. Antilles is unaware of any spills, leaks or releases from the above ground storage of these substances.

20c. The above ground waste oil tank was installed by the previous tenant prior to beginning operations.

20d. N/A

21a. Antilles Automotive St. Thomas Corporation

21b. Owners of the facility are:

Siegfried Torinus and Waltrud Torinus

Last know local address:
P. O. Box 2112
St.Thomas, USVI 00801

A chronological listing of tenants is as follows:

Prime Automotive Parts Warehouse
TAG Industries, Inc.
Antilles Automotive St. Thomas Corporation

21c. 4004 Anna's Retreat
St. Thomas, USVI 00802

21d. R. Bradley Creger
President
4004 Anna's Retreat
St. Thomas, USVI 00802

21e Registered Agent:
Todd Newman, Esq.
Nichols, Newman and Silverlight
7 King Street
Christiansted, St. Croix, USVI 00820

Incorporated in the USVI

21f. N/A

22. N/A

23. No EPA ID Number or permits

24. The company has not disposed of waste oil or antifreeze. It is storing these items awaiting pick up by the Virgin Islands Government's vender who is contracted to provide for its disposal.

25. A copy of the first page of the lease on the subject is attached. The environmental language appears in paragraph 1A section 3.

26. A copy of the environmental section of the policy is attached. The corporation has been unable to obtain insurance policies of previous tenants.

27. The company conducts ongoing environmental employee awareness meetings. Employees are supervised and trained to prevent spillage of any chemical or substance. Waste oil and antifreeze are carefully stored on sight.

Chemical Listing

<u>PRODUCT</u>	<u>MANUFACTURER</u>	<u>USE/APPLICATION</u>
Refrigerant oil	GM	In a/c system
Engine oil supplement	GM	In engine oil
Hand cleaner	Gojo (non toxic)	Wash hands
Oil SAE 40	Valaline	In engine
Oil 15W/40	GM	
Auto trans. fluid	GM	In transmission
Brake part cleaner	GM	clean brake parts
Antifreeze/coolant	GM	In radiator
Radiator flush	Gunk	flush system
Engine Cleaner	Champion	
	Champion	clean eng. parts
	STP	
	Gunk	
Silicone spray lube	gunk	lubricate parts
	Champion	
Oil Treatment	Champion	In engine oil
Power steering Cond.	Gunk	In pwr. st. fluid
Octane booster	Gunk	In gas tank
Bearing Seal	Gunk	In engine
Hydraulic jack oil	Gunk	In shop jacks
Carburetor cleaner	Champion	In gas tank
Windshield washer fld	Champion	In w/s reservoir
	GM	
Power steering fld	STP	In p/s reservoir
	Gunk	
	Prestone	
	GM	
White lithium grease	Gunk	Lubricate parts
Emerald Lubricant	Drydene	
Car wash soap	GM	Wash vehicles
Sun brite cleaner	American Chemical	
Top engine cleaner	GM	In carb/eng.
Silicone tire shine	GM	Spray on tires
Weather Stripe Adhesive	GM	Glue
Side wall cleaner	GM	clean tires

Antilles Automotive - St. Thomas
Estate Anna's Retreat
St. Thomas, U.S.V.I

Approximate Scale =
1" = 30'

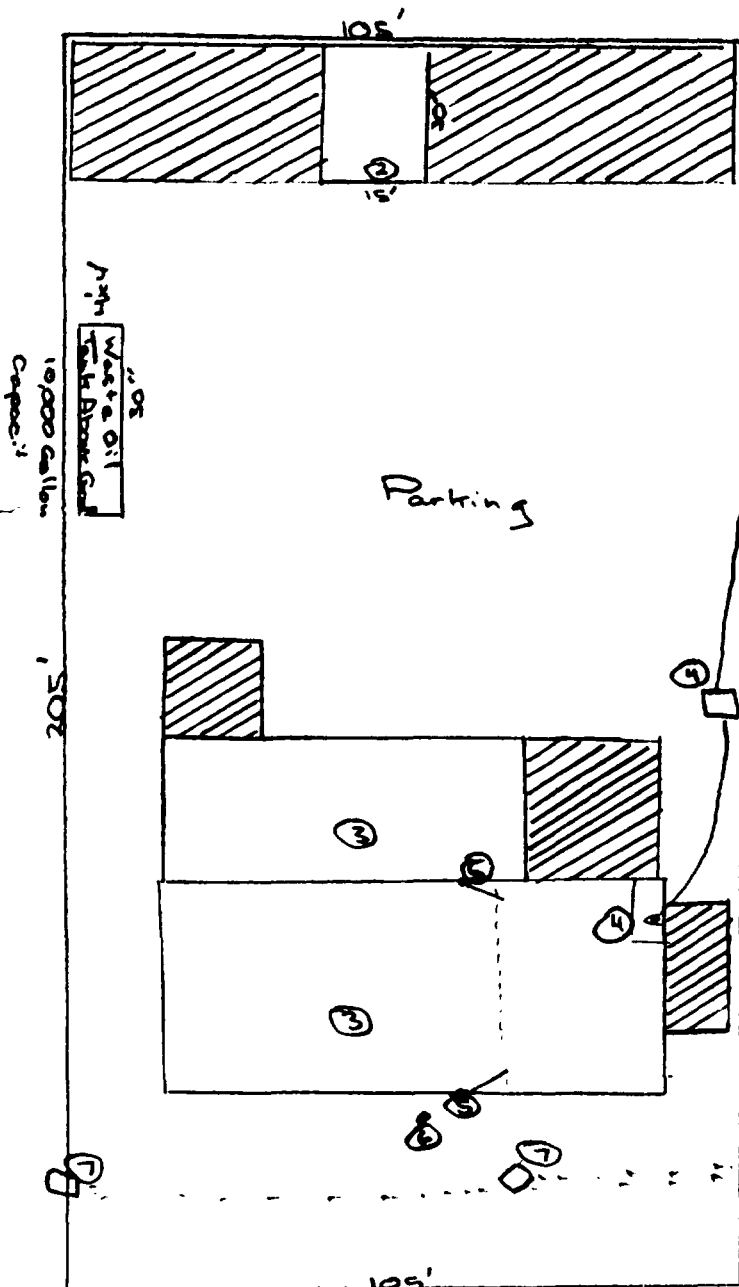
↑ East

Notes:

- ① Shaded Areas are corrugated Corrugated Steel
- ② Back Building is Corrugated steel roofing and siding; wood frame. All corrugated metal has been coated.
- ③ Front Building is Corrugated steel roofing and siding; wood frame.
- ④ Building Plumbing underground hookup to Municipal Sewage. Approximate Location of Municipal Sewage lines.
- ⑤ Rain Gutters from roof to water cistern
- ⑥ Cistern vent stack
- ⑦ Storm Drains - Municipal

There are no underground tank; lifts or septic tanks. Our waste oil tank is above ground, has never leaked; it was partially full when Antilles first leased the facility.

Route 384



SUB-LEASE

This Sub-Lease made this June 13, 1992, is by and between:

TAG INDUSTRIES, INC.
25 Estate Charlotte Amalie
St. Thomas, V.I. 00801

a Virgin Island Corporation, hereinafter known as "Master-Tenant" or M/T.

and

ANTILLES AUTOMOTIVE CORP.
P.O. Box 2570, Kingshill
St. Croix, U.S.V.I. 00851

a Virgin Island Corporation, hereinafter known as "AAC".

Both M/T and AAC mutually agree that this "Sub-lease" is subject to and governed by a Sub-Lease by and between M/T and Thomas Gassett and that Sub-Lease or "Concession" is subject to the Master Lease (KNOWN HEREIN AS THE TORINUS LEASE) held by Thomas Gassett, as a private individual.

In event of any disagreement, dispute or difference of language and/or performance between this sublet and the Torinus/Gassett Lease, the Torinus/Gassett Lease shall automatically and exclusively govern.

This sublet is subject to any and all the terms and conditions that are in the Torinus Lease regardless of the language of M/T's Concession Agreement and/or this sublet.

WITNESSETH

I. PREMISES

A. In consideration of the rents to be paid and covenants and agreements to be performed by the parties, M/T does hereby sublet unto AAC and AAC does hereby sublet from M/T the following described premises to wit:

1. Known and described in the Torinus Lease as "Parcel # 1 New Quarter, 214 Anna's Retreat, St. Thomas".
2. AAC further acknowledges that it has examined the Leased said premises and accepts the leased premises in its present condition at the date of execution of this lease. (EXCLUDING ENVIRONMENTAL CONCERNS)
3. The following items to remain with the facility for the use of AAC during the 60 month Sub-Lease:
 - a. Three (3) of the five (5) existing vehicle

This endorsement forms a part of the policy to which attached, effective on the inception date of the policy unless otherwise stated herein.

(The following information is required only when this endorsement is issued subsequent to preparation of policy.)

Endorsement effective

Policy No.

Endorsement No.

Named Insured

Countersigned by _____

(Authorized Representative)

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following:

**BUSINESS OWNERS POLICY
COMPREHENSIVE GENERAL LIABILITY INSURANCE
CONTRACTUAL LIABILITY INSURANCE
MANUFACTURERS AND CONTRACTORS LIABILITY INSURANCE
OWNERS AND CONTRACTORS PROTECTIVE LIABILITY INSURANCE
OWNERS, LANDLORDS AND TENANTS LIABILITY INSURANCE
SMP LIABILITY INSURANCE
STOREKEEPERS INSURANCE**

POLLUTION EXCLUSION

It is agreed that the exclusion relating to the discharge, dispersal, release or escape of smoke, vapors, soot, fumes, acids, alkalis, toxic chemicals, liquids or gases, waste materials, or other irritants, contaminants or pollutants is replaced by the following:

- (1) to **bodily injury or property damage** arising out of the actual, alleged or threatened discharge, dispersal, release or escape of pollutants:
 - (a) at or from premises owned, rented or occupied by the **named insured**;
 - (b) at or from any site or location used by or for the **named insured** or others for the handling, storage, disposal, processing or treatment of waste;
 - (c) which are at any time transported, handled, stored, treated, disposed of or processed as waste by or for the **named insured** or any person or organization for whom the **named insured** may be legally responsible; or
 - (d) at or from any site or location on which the **named insured** or any contractors or subcontractors working directly or indirectly on behalf of the **named insured** are performing operations:
 - (i) if the pollutants are brought on or to the site or location in connection with such operations; or
 - (ii) if the operations are to test for, monitor, clean up, remove, contain, treat, detoxify or neutralize the pollutants.
- (2) to any loss, cost or expense arising out of any governmental direction or request that the **named insured** test for, monitor, clean up, remove, contain, treat, detoxify or neutralize pollutants.

Pollutants means any solid, liquid, gaseous or thermal irritant or contaminant, including smoke, vapor, soot, fumes, acids, alkalis, chemicals and waste. Waste includes materials to be recycled, reconditioned or reclaimed.

Subparagraphs (a) and (d) (i) of paragraph (1) of this exclusion do not apply to **bodily injury or property damage** caused by heat, smoke or fumes from a hostile fire. As used in this exclusion, a hostile fire means one which becomes uncontrollable or breaks out from where it was intended to be.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATIONTerritory of USVI

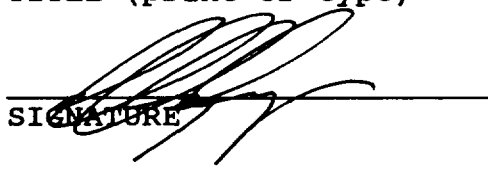
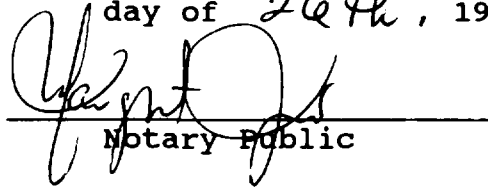
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

R. BRADLEY CREGER

NAME (print or type)

President, Antilles Automotive ST Thomas Corp.

TITLE (print or type)


SIGNATURESworn to before me this
day of 26th, 1993
Notary Public