

5/25/94

EXPRESS MAIL-
RETURN RECEIPT REQUESTED

Ms. Nancy D'Anna
P.O. Box 37
Cruz Bay
St. John, USVI 00831

**Re: Conditional Approval of the Work Plan for Evaluation and Interim
Remediation of Soils at O'Henry Laundry, Tutu, St. Thomas, USVI**

Dear Ms. D'Anna:

The U.S. Environmental Protection Agency (EPA) has completed the review of the above-referenced document dated December 1993 and the transmittal responses to the EPA's comments on April 7, 1994. Conditional approval is granted based on the inclusion of the following:

- 1) The Work Plan stated that no structural support will be used. Instead, the excavation of the contaminated soil will be limited to conform with OSHA standards. This will limit the removal of contaminated soil in the vicinity of the building. Therefore, a contingency plan such as an in-situ remedy (i.e. soil vapor extraction) should be cited in the Work Plan when and if this occurs.
- 2) The Work Plan reiterated its intent to store excavated soil on and under plastic sheeting. The Work Plan justified this method as the storage of soil in roll-off bins for an uncertain length of time was determined to be cost "prohibitive". This is acceptable provided the cover is routinely checked and maintained.
- 3) Once the contaminated soils have been excavated, the excavated soils would need to pass the RCRA characteristics such as toxicity by TCLP, ignitibility, corrosivity and reactivity before ultimate disposal.

- 4) All local permits must be obtained prior to field work.
- 5) Provide a detail schedule of the remediation in a gant or bar chart format.

Please call Ms. Caroline Kwan at (212) 264-0151 if you have any questions.

Sincerely yours,

Carole Petersen, Chief
New York/Caribbean Superfund Branch II

cc: Belinda Price- IT Corp.
Andy Praschak- EPA/CFO
Sally Odland- CDM/FPC