



UNIVERSITY of the VIRGIN ISLANDS

Water Resources Research Institute

March 10, 1996

Ms. Caroline Kwan
Remedial Project Manager
U. S. Environmental Protection Agency
290 Broadway, 20th Floor
New York, New York 10007-1866

Dear Ms. C. Kwan:

Thanks for the opportunity to review the Proposed Plan and to provide comments made at the public hearing on March 5, 1996.

My principal concern is that the document summarizing the Proposed Plan on which the public in Tutu was expected to provide input on was written in a foreign language. The low public participation at the hearing on March 5, 1996 and previous hearings I feel can be partly attributed to this. I am confident that you as well as I sincerely believe that true success of any actions at this Superfund site is greatly dependant and enhanced by participation from the affected population. While it may be too late to translate this document in to language that the bulk of the population can comprehend I advise you that no remediation alternative can be properly implemented unless there is communication to the persons affected in language that they can understand. An effective public information program is vital to whatever remediation alternative is selected. Having said all this though, I confess that I am fully aware of the difficulties of effectively presenting this material in a form understandable to the general public.

In my work at the Virgin Islands Water Resources Research Institute, we consider public participation to be critical and I know how difficult it is to obtain. I also am aware of efforts made by your office to secure public input. These efforts though need to be expanded. Given the enormity of the Tutu aquifer problem and the effect that it can have on people's lives a it would be appropriate that a comprehensive information program be included in the cleanup. This should be more than just reliance on

volunteers as was mentioned in the hearing.

Also, I urge that the introduction of treated water directly in to the Tutu water distribution systems be well researched. I am fully aware of the need to use all available water and also I know that this practice might have been followed elsewhere. However, in the instant situation where the affected community is smaller than most, the technical awareness and confidence in water treatment processes low, public acceptance of this alternative at the implementation is not assured.

My comments are intended to help you in your efforts and I hope that they will be accepted as such. At the Water Resources Research Institute of the University of the Virgin Islands we are as concerned as you are about the risks to public health caused by the contamination of this aquifer and applaud your efforts. We encourage you to not look at public participation as only a responsibility dictated by CERCLA but rather an essential component of any remedial alternative that will provide for maximum protection of the environment and human health. If we can be of any assistance to you, please do not hesitate to call on us.

The University's Eastern Caribbean Center and the WRI have committed themselves to working with the Tutu community to minimize the effects of the water contamination problem. We urged community groups to have members participate in the March 5 hearing and have applied for an Environmental Justice grant to enable us to work formally with community based groups to transfer information and develop skills and confidence to actively participate in resolving the problem. We would welcome any suggestions you may have and look forward to working with you in the future.

Sincerely,



Henry H. Smith, Ph.D.
Director