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US EPA Contract No. 68-W9-0024

ARCS II

**REMEDIAL PLANNING ACTIVITIES AT SELECTED
UNCONTROLLED HAZARDOUS SUBSTANCE
DISPOSAL SITES WITHIN EPA REGION II
(NY, NJ, PR, VI)**

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DRAFT COMMUNITY RELATIONS PLAN

**VIRGIN ISLAND CHEMICAL
ST. CROIX, U.S. VIRGIN ISLANDS**

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ST. CROIX, U.S. VIRGIN ISLANDS**

**EPA CONTRACT NO.: 68-W9-0024
WORK ASSIGNMENT NO.: 078-2PN7
DOCUMENT CONTROL NO.: 7720-078-CR-CHBP**

AUGUST 1995

Prepared for:

**Environmental Protection Agency
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a subsidiary of Camp Dresser & McKee Inc.

August 1, 1995

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PROJECT: EPA Contract No.: 68-W9-0024

DOCUMENT No.: 7720-078-EP-CHBN

SUBJECT: Island Chemical Site
St. Croix, U.S.V.I.
Draft Community Relations Plan
Document No.: 7720-078-CR-CHBP

Dear Ms. Devine and Ms. Henry:

CDM FEDERAL PROGRAMS CORPORATION (CDM Federal) is pleased to submit this Draft Community Relations Plan as partial fulfillment of the reporting requirements of this work assignment.

If you have any questions regarding this submittal, please do not hesitate to call Ms. Pamela Philip at (212) 393-9634.

Sincerely,

CDM FEDERAL PROGRAMS CORPORATION



Robert D. Goltz, P.E.
ARCS II Program Manager

Enclosure

cc: P. Philip, CDM Federal/NYC
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C. Mason, CDM Federal/FFX
Document Control (2 copies)
Project File

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Island Chemical/Virgin Island Chemical Site

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COMMUNITY RELATIONS PLAN
ISLAND CHEMICAL/VIRGIN ISLAND CHEMICAL SITE,
ST. CROIX, U.S. VIRGIN ISLANDS

A. OVERVIEW OF THE COMMUNITY RELATIONS PLAN

The U.S. Environmental Protection Agency (EPA) has prepared this Community Relations Plan (CRP) to identify efforts EPA will undertake to inform the public of cleanup actions at the Island Chemical/Virgin Island Chemical Site (the Site) located on St. Croix, U.S. Virgin Islands and to involve the Site community in making decisions regarding its remediation. The CRP summarizes the history of the Site, identifies current community issues and concerns, and recommends community relations techniques. Through the implementation of this CRP, EPA will disseminate accurate, timely information to the affected citizens and maintain open communication with the community.

Preparation of a CRP is required under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). CERCLA, commonly known as Superfund, authorizes cleanup of abandoned or uncontrolled hazardous waste sites placed on the National Priorities List (NPL). The Island Chemical/Virgin Island Chemical Site was proposed for inclusion on the NPL on January 18, 1994. This action makes the Site a priority site requiring compliance with CERCLA, including citizen involvement.

The information in this plan was gathered during a fact-finding trip conducted by EPA to St. Croix on November 2 and 3, 1994. During that time, EPA visited businesses adjacent to the Island Chemical/Virgin Island Chemical Site and discussed upcoming Site activities and their schedule. EPA also met with representatives of Harding Lawson Associates, consultant for Island Chemical Co., Inc. and Berlex Laboratories, Inc., respondents to the Administrative Order on Consent for the Site remedial investigation/feasibility study (RI/FS); the Virgin Islands Port Authority; a representative of the Division of Student Affairs, the University of the Virgin Islands St. Croix Campus and the chief librarian at the campus library; the Virgin Islands Department of Planning and Natural Resources (DPNR); Senator Holland L. Redfield II, and the Postmaster, Kingshill, Virgin Islands.

The community relations program outlined in this CRP focuses on activities designed to keep citizens, business owners, officials, and other interested parties apprised of Site developments and Superfund remedial actions at the Island Chemical/Virgin Island Chemical Site. The CRP is tailored to address specific areas of interest and concern to the public as they are currently known by EPA and is sufficiently flexible to provide for modification as the community's

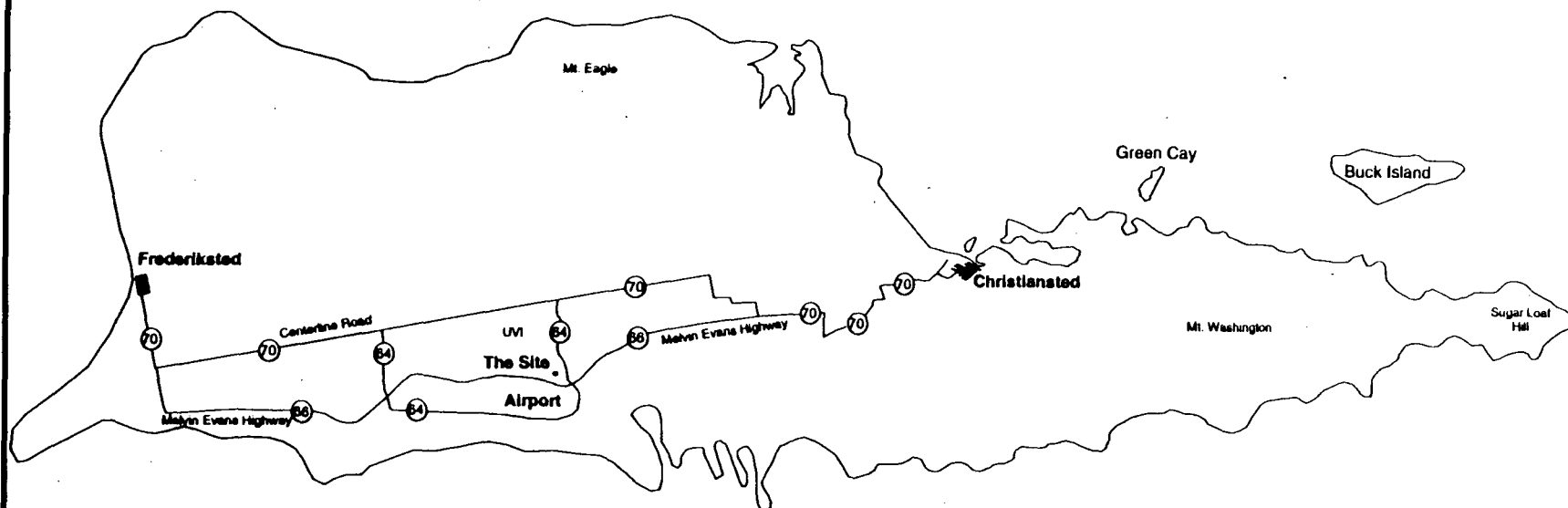
concerns and questions change over the course of the scientific studies and cleanup program. This document is organized into the following sections:

- Site Description - provides a Site description and brief history of the Island Chemical/Virgin Island Chemical Site
- Community Background - provides a community profile, a chronology of community involvement at the Site, and a description of key community issues and concerns
- Highlights of the Program - describes the objectives of this community relations program and the approaches EPA will take to effectively implement them
- Techniques and Timing - presents a list of community relations activities for the Island Chemical/Virgin Island Chemical Site and suggestions for coordinating the community relations activities with the technical phases of the Superfund remedial process
- Appendices - Lists of federal and territorial agency representatives; federal and territorial elected officials; citizen groups; media representatives; suggested locations for the information repository, administrative record and public meetings; a glossary and a list of acronyms; and information on Technical Assistance Grants.

EPA Region II, which has jurisdiction over the Virgin Islands and is based in New York, has lead responsibility for managing the Island Chemical/Virgin Island Chemical Site cleanup. EPA has pursued enforcement actions to require the respondents to pay for and perform the Site cleanup, with EPA oversight. Respondents are those "persons" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. §9601(21) who owned and/or operated the Site during a portion of the period when hazardous substances were disposed of at the Site. Accordingly, respondents are responsible parties under Sections 104, 107 and 122 of CERCLA, 42 U.S.C. §§9604, 9607, and 9622. The EPA Region II Superfund Community Relations Branch will oversee all community relations activities at the Site, with support from DPNR.

B. SITE DESCRIPTION

The Island Chemical/Virgin Island Chemical Site is located on Plot 13Q of Estate Bethlehem Middle Works off of the Melvin Evans Highway (Route 66) on St. Croix, U.S. Virgin Islands (Figure 1). Encompassing approximately 3.5 acres, the Site ranges in elevation from 10 to 30 feet above sea level. It is currently unoccupied and about a quarter of the Site is covered by buildings and/or process equipment. These structures exhibit serious damage sustained from Hurricane Hugo, which devastated St. Croix and the surrounding Islands in 1989. The buildings are surrounded by overgrown vegetation which characterizes the Site and shields the facility from passers-by and adjacent businesses and nearby residents. The Site is bordered on the north



Note: Not to Scale

Source: Map and Guide to Great Shopping on St. Croix, 1994.

**ISLAND CHEMICAL/VIRGIN ISLAND CHEMICAL SITE
ST. CROIX, U.S. VIRGIN ISLANDS
FIGURE 1**



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by an intermittent stream, River Gut, which originates north of the Site and discharges to the Caribbean Sea.

The area surrounding the Site is predominantly commercial. Five businesses and one small restaurant are located adjacent to the Site. The businesses are the Virgin Islands Asphalt Products Corporation (VIAPCO), Virgin Islands Paving, Inc., King's Automotive, Charlie's Concrete Services, and Fix-It-Right Transmission Rebuilders. Table 1 indicates the number of wells operated by each business and the principle use of the water. The St. Croix Prison at Golden Grove is also located in the immediate vicinity, approximately one quarter of a mile north of the Site. The closest residences are located approximately one-half of a mile north of the Site in a section of Upper Bethlehem Estate known as New Works. Situated on an elevated parcel, the development contains about 25 homes and a small neighborhood grocery store at its base. Finally, south of the Site is a quarry, the Melvin Evans Highway, and Alexander Hamilton Airport (Figure 2).

In 1968, Charles H. Steffey, Inc. purchased the Site. At some point prior to 1982, the company changed its name to CHS Holding Corporation (CHS) and the Site currently is owned by CHS. A brief history of the Site's ownership and operations follows:

May 1969 - CHS enters into a 30-year lease with Houston Chemical Industries. Caribe Chemical Company, a wholly owned subsidiary of Houston Chemical, operates the facility.

March 1972 - Pierrel International S.A. acquires all the shares of Caribe. Houston Chemical assigns the Site lease to Caribe, which becomes known as Pierrel America, Inc.

July 1978 - Cooper Laboratories incorporates Island Chemical Company, Inc. as its subsidiary. Island Chemical assumes Cooper Laboratories' operations at the Site.

November 1979 - Cooper Laboratories sells 100 percent of its Island Chemical stock to Berlex Laboratories, Inc.

September 1984 - Berlex sells Island Chemical's assets and assigns the Site lease to Virgin Island Chemical Company.

Between 1978 and 1980 or later, Island Chemical conducted production operations at the Site which included the production of quinidine gluconate. During the period when Island Chemical operated at the Site, CERCLA hazardous substances (as defined by Section 101(14) of CERCLA, 42 U.S.C. S9601(14)), were disposed of at the Site, including pyridine, acids, and solvents. Island Chemical is currently a wholly owned subsidiary of Berlex.

Table 1

Water Supply Sources for Local Businesses

Business Name	Water Supply Source	Principle Use
Virgin Islands Asphalt Products Corporation (VIAPCO)	2 wells cisterns	Industrial use Potable
Virgin Islands Paving, Inc.	No well cisterns	Potable
King's Automotive	No well	Potable water supplied by Eustace Carr
Charlie's Concrete Services	1 well	Concrete mixing
Fix-It-Right Transmission Rebuilders	No well	Potable water supplied by Eustace Carr
Eustace Carr, Proprietor - Restaurant property owner	1 well	Potable use for restaurant and tenants

Virgin Island Chemical's operations at the Site included the production of, among other things, benzyl chloride and benzyl salicylate, which is used as a perfume fixative, a solvent for synthetic musk, and an ingredient in suncreening lotion. Virgin Island Chemical also subleased portions of the Site to various entities, including U.S. Resources and Chemicals, Inc. and, later, VIAG Fuels, Inc., both of which conducted an alcohol dehydration operation at the Site. The Site is currently inactive.

In 1984, Berlex hired Enviro-Sciences, Inc. (ESI) to conduct sampling at the Site. Two areas located within the tank farm were found to be contaminated with toluene. Two other areas, underneath the concrete loading dock and a nearby trench, were contaminated with pyridine.

Between 1985 and 1986, EPA's Surveillance and Monitoring Branch conducted an investigation which revealed the presence of various contaminants in soil at the Site, including phthalates, benzene, chloroform, polynuclear aromatic hydrocarbons, cadmium, chromium, and zinc. EPA's investigation also indicated that process water from the facility was discharged into the intermittent stream adjacent to the Site. Analysis of the sediments from the creek bed downstream of the discharge point showed contamination consisting of xylene, di-n-octyl phthalate, 1,4-dichlorobenzene, 1,2-dichlorobenzene, naphthalene, fluorene, phenanthrene, aliphatic and aromatic hydrocarbons, arsenic, beryllium, chromium, copper, lead, nickel, antimony, and zinc. In addition, an on-site production well showed contamination by arsenic, beryllium, cadmium, chromium, copper, mercury, antimony, chloroform, and zinc.

During March and November 1988, EPA's Response and Prevention Branch conducted well sampling and analyses at the nearby Fairplains wells. These wells are located approximately one-half mile south of the Site and are a major source of drinking water on the Island. Chloroform contamination was found in three of the Fairplains wells. In addition, chloroform contamination was found in a Virgin Island Port Authority well which is located between the Site and the St. Croix prison.

In early 1989, during a Site inspection, EPA found deteriorated drums and other containers of hazardous substances in the main building and warehouse. Some of the containers had released some of their contents, and further releases were threatened. Holes in the warehouse roof had led to rain water flooding the warehouse; in turn, spills from the containers had discharged onto the ground east of the warehouse. EPA also observed that incompatible hazardous materials were being stored in close proximity in the warehouse and the laboratories. EPA determined that a removal action was necessary to abate the threat of adverse chemical reactions, fire, explosion, or other releases of hazardous substances from drums and other containers stored at the Site.

On August 8, 1989, EPA signed an Action Memorandum for performance of the removal action, which the Agency conducted from 1989 to 1991. The action included removal and disposal of lab pack material and drums from the Site.

In October 1994, EPA Region II, and Island Chemical Co., Inc. and Berlex Laboratories, Inc. (referred to as the respondents) voluntarily entered into an Administrative Order on Consent whereby the respondents agree to conduct and pay for a remedial investigation and feasibility study (RI/FS) concerning the Island Chemical/Virgin Island Chemical Site. The purpose of the remedial investigation is to determine the nature and extent of contamination, if any, and any threat to the public health, welfare, or the environment caused by any release or threatened release of hazardous substances, pollutants, or contaminants in connection with the Site. The purpose of the feasibility study is to determine and evaluate alternatives for the remediation or control of any release or threatened release of hazardous substances, pollutants, or contaminants in connection with the Site.

The respondents have hired Harding Lawson Associates to prepare the work plan for the remedial investigation and conduct the scientific studies. EPA has approved a Work Plan submitted by Island Chemical that outlines the field activities to be conducted during the remedial investigation. All work conducted by or on behalf of respondents under the Consent Order is subject to EPA approval and must be conducted in compliance with all applicable EPA guidance, policies, and procedures.

On January 18, 1994, the Site was proposed for inclusion on the National Priorities List (NPL), 40 CFR Part 300, Appendix B. There have been releases and/or threats of releases of hazardous substances into the environment at and from the Site.

C. COMMUNITY BACKGROUND

1. Community Profile

In the path of tradewinds blowing directly from Portugal, St. Croix was among the first islands to be sighted by Columbus on his second voyage westward in 1493. He then sailed northeast, passing St. Thomas, St. John and Tortola, and called them collectively Las Virgenes. The U.S. territories (St. Thomas, St. Croix and St. John) are located in the Lesser Antilles 1,600 miles south, southeast of New York City; 1,100 miles east, southeast of Miami; 70 miles east of San Juan. St. Thomas and St. John lie between the Atlantic and the Caribbean. St Croix, 40 miles south, is surrounded by the Caribbean.

Since 1493, the flags of Spain, France, England, Holland, Denmark, and the U.S. have flown over St. Thomas, St. John, and St. Croix. The U.S. purchased what was then known as the Danish West Indies on March 31, 1917. In 1927, the residents of the Virgin Islands were granted U.S. citizenship, and the Islands were administered by the U.S. Navy until 1931, when they were placed under the authority of the Department of the Interior.

Presently, the U.S. Virgin Islands are administered by a governor who is popularly elected and a popularly elected legislature, made up of 15 senators, which has operated since 1852. St. Croix is represented in the legislature by 7 of the 15 senators. The Islands are represented in

the U.S. Congress by an elected but non-voting delegate. Virgin Island residents who are U.S. citizens pay federal income taxes but do not vote in national elections.

The largest of the Islands, St. Croix is 84 square miles, measuring 28 miles long and 7 miles wide. The ruins and restorations of over 100 sugar mills and great houses dot historic St. Croix, including Estate Whim, an eighteenth century plantation restored by the Landmark Society. Once an island of sugar cane planters, Alexander Hamilton spent his boyhood here. Today, St. Croix is a resort of rolling hills and sandy beaches. It is a 20-minute plane trip to St. Croix from St. Thomas.

Recent statistics indicate the resident population of St. Croix to be slightly over 50,000. Known as Cruzans, residents of St. Croix earn an annual average gross pay of approximately \$21,500. In 1993, the average price of a home was \$172,000 and 102 homes were sold on the island in that year. For the same year, the average price of a condominium was \$119,000 and 62 were sold. About 179,000 tourists traveled to St. Croix by air in 1993 and another 31,000 traveled to the island by cruise ship (U.S. V.I. Bureau of Economic Research, September, 1994).

The community surrounding the Island Chemical/Virgin Island Chemical Site is mainly commercial. Five businesses plus a small restaurant are situated adjacent to the Site. A small, neighboring residential development of about 20 to 25 homes is located north of the Site in a section of Upper Bethlehem Estate known as New Works; it also contains a small grocery store. Additionally, the St. Croix Prison is located in the immediate vicinity of the Site. Other notable features of the community include a nearby quarry, the Melvin Evans Highway, and the Alexander Hamilton Airport. The Port Authority has plans to double the size of the existing airport in the near future.

2. History of Community Involvement

Community involvement with the Island Chemical/Virgin Island Chemical Site has been minimal up to this point, for several reasons. Firstly, there has been limited public knowledge of the Site because the contamination appears to be relatively Site-specific and, as such, has not received much publicity. Secondly, EPA has just begun the remedial investigation. Prior to the recent remedial activity at the Site, the facility had been abandoned for more than 10 years and had been all but obscured from public view by mature vegetation. Lastly, the area surrounding the facility is predominantly commercial. The nearest homes are located in New Works approximately 0.5 miles to the north. Though these residents may have been aware of their proximity to the Site, their cause for concern would have been virtually non-existent, given the above observations.

The first opportunity for public involvement came during the first week of November 1994. During that time, EPA officials visited the inactive facility and talked to representatives or owners of the businesses and restaurants adjacent to it about the Site investigations. These community members were notified that the land at the Site would be cleared for drilling and sampling activities. They were told that personnel in protective clothing would be on site from

Harding Lawson, the respondents' consultant, to conduct the investigations. In addition, they were notified that personnel from CDM Federal Programs Corporation would be on site as well to assist EPA in an oversight capacity. During these discussions, the business representatives had opportunities to ask questions and express their concerns. They also were told that EPA would be sending them a fact sheet about the Site in the near future.

The next opportunity for public involvement was a fact sheet which EPA distributed door-to-door in January 1995 to these businesses and to the nearby residents of New Works. The fact sheet explained the nature of the contamination and the need for the remedial investigation in layman's terms. Most recently, on February 15, 1995, EPA held a public meeting at the Department of Education Curriculum Center to present the Remedial Investigation Work Plan and to answer questions from the community. More than 20 individuals attended, representing local citizens, an area homeowners association, nearby businesses, the League of Women Voters, the U.S. Attorney's Office, a local law firm, DPNR, and the Virgin Island legislature.

Lillian Johnson, Chief, Community Relations Branch, EPA Region II opened the meeting by emphasizing the importance of public involvement in the Superfund decision-making process. She presented many examples of how EPA works with community members to initiate opportunities for public involvement. These include public meetings and less formal, public availability sessions, fact sheets distributed door-to-door or through a focused mailing list, news releases that report major milestones in local media, and the technical assistance grants (TAG) program, which enables citizens to apply for grant money to hire an independent consultant to read and interpret technical documents. Ms. Johnson then presented a short videotape describing the Superfund process.

Following the Superfund video, Sherrel Henry, Remedial Project Manager, EPA Region II gave a short presentation on the history of the Site and the current remedial investigation. Her presentation included:

- general Site background
- a description of past response actions conducted in September 1984 and the removal action conducted on January 31 and February 1, 1985
- an outline of current activities, and
- details of the soil and the groundwater sampling program planned in the current investigation.

At the end of the meeting, EPA answered questions from the audience. Attendees were encouraged to telephone either EPA or their local contact at DPNR with any further questions or concerns.

EPA also announced that it plans to hold a public availability session in Fall 1995. In addition, EPA intends to maintain telephone contact with interested parties until the remedial investigation is completed.

EPA has established an information repository at the University of the Virgin Islands campus library. At present, the repository contains the Remedial Investigation Work Plan and fact sheets prepared by EPA. Soon, EPA will add the Community Relations Plan, along with other Site-related documents. These materials are available for review by the public at the reserve desk. See Appendix C for hours of availability.

3. Summary of Current Community Concerns

At present, current community concerns about the Island Chemical/Virgin Island Chemical Site are relatively minor. Although EPA has not conducted interviews with members of the community to date, EPA did visit each business which is adjacent to the Site during the week of November 2, 1994 to provide information about the remedial investigation and to answer questions. Based upon these visits and discussions with representatives of the Virgin Islands Port Authority, DPNR, the legislature, and the post office, EPA has identified the following issues:

- **The Need for Ongoing Communication** - Business owners adjacent to the Site would like to be kept informed of technical milestones and opportunities for public involvement. They would like to receive a fact sheet explaining the nature of the contamination and details about the remedial investigation. They would also like to maintain telephone contact with EPA officials on an as-needed basis.
- **Continued Use of Wells in Site Vicinity** - Those business members of the community who operate wells in the Site vicinity want to be able to continue to use those wells to serve their needs. For instance, the Port Authority operates wells west of the Site that serve the local airport, which is slated to double in size. The Port Authority is concerned about how the remedial investigation at the Island Chemical/Virgin Island Chemical Site will affect the operation of these wells for expanded airport use.
- **Preservation of Natural Resources on St. Croix** - The general public via its legislative representatives is concerned that the natural resources on St. Croix be preserved and cleaned up, if necessary. Cruzans are very proud of their environment and would like assurances that every effort is being made to keep it a safe and healthy place for their families and for visitors to enjoy.

EPA expects that community relations activities related to the initiation of the remedial investigation will alleviate the general lack of information provided to date about the Superfund program and the Island Chemical/Virgin Island Chemical Site.

Most recently, on February 15, 1995, when EPA held its first public meeting for the Site to explain the Remedial Investigation Work Plan, several interested parties expressed additional concerns about the Site investigation.

- One concern focused on whether EPA is extending its investigation beyond the Site boundaries or source area itself. EPA explained that it was taking a phased approach, conducting an on-site investigation first, per the consent order signed on September 29, 1994. EPA noted that if no further contamination were found on-site, then other studies would be conducted on off-site property.
- Others wanted to know who was conducting the work. EPA reiterated that the responsible parties were performing the remedial investigation and that, in an oversight capacity, EPA would be taking split (or duplicate) samples. When asked about the results of its sampling events, EPA said that it will wait until all sampling rounds are back from the laboratory before making that disclosure.
- Finally, some attendees were concerned about the use of well water for drinking. EPA noted that the businesses adjacent to the Site do not use their water for drinking, and that many have either cisterns or potable water or both, for that purpose. EPA further remarked that the affected wells would be sampled on a regular basis to continually monitor the situation.

In developing this community relations plan, EPA has planned numerous opportunities for community involvement which can be modified based upon remedial investigation results or when community concerns become more defined or change focus. For example, if results of the remedial investigation show contamination beyond the Site vicinity, EPA may choose to conduct interviews with residents of New Works. In the meantime, EPA will recognize that community's need for up-to-date information on Site activities as they observe the land being cleared and drilling and sampling activities taking place.

D. HIGHLIGHTS

The community relations program at the Island Chemical/Virgin Island Chemical Site will allow the community to learn about and participate in the Superfund remedial process. Accurate, up-to-date information should be accessible to the affected community through techniques that encourage openness and instill trust. Based on the information collected and concerns expressed during visits made to businesses adjacent to the Site in early November 1994, EPA has set the following goals and objectives for community relations activities at the Island Chemical/Virgin Island Chemical Site.

1. Educate the community about the policies, procedures, and requirements of the Superfund program as it relates to the Island Chemical/Virgin Island Chemical Site. To explain EPA's role and the various respondents' responsibilities at the Site, basic information on the Superfund process will be prepared and distributed to the community. Areas of particular concern are:

the scoring of NPL sites; the roles of the territory, EPA, and respondents involved in the remediation of the Site; and the schedule for selecting, designing, and implementing a Superfund remedy.

2. Document historical and recent data on the contamination at the Site for public access. EPA will present a chronology of the contamination at the Island Chemical/Virgin Island Chemical Site, including up-to-date findings on migration pathways. Topics might include: the discovery of contamination, pinpointing the source(s) of contamination, the current extent of contamination, and the potential risks to human health and the environment. The underlying message would be that EPA wants to share its information with the community, to build public confidence in its actions, and to ease health- and safety-related fears by communicating an accurate picture of the Site and its risks.

3. Enlist local citizens/business establishments and media to "spread the word." EPA will identify visible places and people to disseminate fact sheets and other informational materials to more effectively keep the local population informed of current happenings. EPA will also maintain contact with the local media to provide the community with the information it needs. In all cases, EPA representatives will be sensitive to the lifestyle and attitudes of the community.

E. TECHNIQUES AND TIMING

The following community relations activities are recommended to ensure that the community is well informed about Site activities and has the opportunity to express their concerns. Exhibit 1 illustrates the timing of each activity during the remedial schedule for the Site. Activities, and their approximate timing, are as follows.

1. Establish and maintain image of EPA as genuinely responsive to citizens, officials, civic groups, and the media. The overall goal of this community relations plan is to provide accurate and timely responses to questions from interested parties regarding the Island Chemical/Virgin Island Chemical Site and to coordinate an open dialogue with those interested parties via community involvement throughout the remedial process. Sherrel Henry, the EPA Remedial Project Manager for the Site, is available to answer technical inquiries. Ms. Henry will initiate telephone calls on a regular basis, or as needed, to inform community leaders, such as representatives from the Department of Health and local legislature, of major findings and the progress of Site activities.

In addition, if the community wishes to contact a person on St. Croix regarding the Site, Cecil A. Williams, Environmental Specialist at DPNR, is available to answer questions at (809) 773-0565.

2. Identify a credible, accountable point-of-contact who will answer questions regarding the Superfund program and CERCLA-related activities at the Island Chemical/Virgin Island Chemical Site. EPA has designated the Community Relations Coordinator for the Site, Lillian Johnson, as the official point-of-contact. This spokesperson will be available to answer

**Exhibit 1. Schedule of Community Relations Activities
Island Chemical/Virgin Island Chemical Site
St. Croix, U.S. Virgin Islands**

COMMUNITY RELATIONS TECHNIQUE	TECHNICAL MILESTONES							
	Issue Draft RI/FS* Report	Complete Final RI/FS Report	Conduct RI/FS	Complete RI/FS	Issue Draft RI/FS Report	Complete Final RI/FS Report	Issue Proposed Plan	Sign Record of Decision/Select Remedy
1. Open Dialogue	//////////////////// continuous //////////////////////							
2. Information Contact	//////////////////// continuous //////////////////////							
3. Informal Meetings	X	//////////////////// conduct as needed //////////////////////				X		X
4. Fact Sheet/Flyers	//////////////////// as needed //////////////////////							
5. News Releases	X	//////// provided as needed //////////////////////				X	X	X
6. Public Meetings	X					X	X	
7. Information Repository	X	//////////////////// documents added as needed //////////////////////						
8. Public Comment Period							///30 days///	
9. Responsiveness Summary								X
10. Revision of CRP								X

* RI/FS = Remedial Investigation/Feasibility Study

telephone calls and written inquiries from interested parties about Site activities on a day-by-day basis. Ms. Johnson is the Chief, Community Relations Branch for EPA's Region II. Her address and telephone number are as follows: U.S. EPA, Region II, 290 Broadway, 26th Floor, New York, New York 10007-1866; (212) 637-3000.

3. Hold periodic, informal meetings to keep citizens informed of Site activities and to help them better understand technical aspects of the remedial investigation, on an as-needed basis. The purpose of these meetings is to provide general information on EPA actions at the Site and to answer specific questions the community may have on interpreting Site data or sampling report results. Initially, EPA will hold one informal meeting to provide an overview of the Superfund program as it relates to the Site and to explain the RI/FS. Subsequent meetings will focus on citizen concerns, and/or events related to the scientific studies being conducted, as these needs arise. EPA will extend an open invitation to all interested parties in the area to attend, as well as to leaders of community groups who could disseminate information to group members.

4. Prepare fact sheets and flyers to ensure that current, accurate, and understandable information is readily and regularly available to interested parties. The public has expressed a desire to receive information from EPA on a consistent basis. EPA will prepare both fact sheets and flyers to meet this demand for enhanced community understanding and participation at regular intervals.

EPA will develop the fact sheets at significant technical milestones during the remediation process and explain cleanup progress in layman's language. The fact sheets will be a formal vehicle of communication to be sent to a prepared mailing list of local citizens/business people, interested parties, and the information repository.

The flyers will be less formal, printed on bright, colorful paper, and displayed in supermarkets and other high visibility areas. On occasion, EPA may hand out the flyers door-to-door, using the opportunity to gauge public opinion through one-on-one interactions. EPA will print these flyers as needed to briefly highlight technical milestones or to announce opportunities for public involvement.

5. Send press releases to local media to provide timely, unbiased information and seek extended air-time under special circumstances. EPA will write prepared statements covering project plans and milestones and announcements of public meetings and other community events. These press releases will be sent to local newspapers, particularly the Virgin Islands Daily News, local television (Channel 8) and radio stations, state and local officials, and area residents. To publicize major events, EPA will seek air-time on local radio talk shows with a large community following, such as WSTA-The Lucky 13 and WTNB Radio. A complete listing of names, addresses, telephone numbers, and points of contact for local media is included in Appendix A.

6. Hold public meetings to encourage community input on major EPA decisions concerning Site remediation. EPA will conduct public meetings as necessary at central locations, such as the Department of Education Curriculum Center, 2123 Hospital Street, in Christiansted or the Little Theatre at the University of the Virgin Islands, St. Croix Campus, Kingshill. Required meetings include: a) a scoping meeting on the draft RI/FS work plan and the CRP, b) a public informational meeting on results of the RI/FS, and c) a public meeting on the proposed remedy to receive comments in concert with the minimum 30-day public comment period, during which time citizens may write to Sherrel Henry, the EPA Remedial Project Manager, to register their opinions or concerns. EPA will announce the meetings via local media, particularly paid advertisements in the Daily News, and flyers posted at local markets and restaurants.

7. Establish and maintain information repositories to hold all documents for public review. EPA will place fact sheets, flyers, technical summaries, Site reports (including the community relations plan), and information on the Superfund program in the information repository for public review. An information repository will be located at the reserve desk at the library at the University of the Virgin Islands, St. Croix Campus, Kingshill (see Appendix B).

APPENDIX A

10.0043

APPENDIX A

LIST OF CONTACTS AND INTERESTED PARTIES

I. Federal and Territorial Elected Officials

Congressman Victor Fraizer

Capitol Office

2238 Rayburn House Office Building
Washington, D.C. 20515
(202) 225-1790

District Office

P.O. Box 5998
Sunny Isle, St. Croix
U.S. Virgin Islands 00851
(809) 778-5900

Governor Roy Lester Schneider

1105 King Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(809) 773-1404

Lieutenant Governor Kenneth E. Mapp

1131 King Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(809) 773-1404

Legislature of the Virgin Islands - St. Croix Legislators

Office Address

1 Laguna Street Complex
Fredericksted, St. Croix
U.S. Virgin Islands 00840

Mailing Address

P.O. Box 4088
Christiansted, St. Croix
U.S. Virgin Islands 00822

APPENDIX A
(continued)

Senator Adelbert Bryan
Telephone: (809) 772-5438
Facsimile: (809) 772-9217

Senator Gerard Luz A. James, II
Telephone: (809) 773-9396
Facsimile: (809) 778-8484

Senator Winfeld James
Telephone: (809) 772-5718
Facsimile: (809) 773-4330

Senator David Jones
Telephone: (809) 772-5703
Facsimile: (809) 772-7408

Senator Alicia "Chucky" Hansen
Telephone: (809) 774-7033 (St. Thomas)
(809) 773-2424 (St. Croix)
Facsimile: (809) 778-8480 (St. Croix)

Senator Vargrave Richards
Telephone: (809) 773-3501
Facsimile: (809) 773-4330

Senator Lilliana Belardo De O'Neal
Telephone: (809) 773-5255
Facsimile: (809) 773-7705

APPENDIX A
(continued)

II. Territorial Agency Representatives

Beulah Dilmida-Smith
Commissioner
U.S. Virgin Islands Department of Planning and Resources
Nisky Center, Suite 231
No. 45A Estate Nisky
Charlotte Amalie, St. Thomas
U.S. Virgin Islands 00802
Telephone: (809) 774-3320
Facsimile: (809) 775-5760

Kenneth S. Belle
Assistant Commissioner
U.S. Virgin Islands Department of Planning and Natural Resources
Nisky Center, Suite 231
No. 45A Estate Nisky
Charlotte Amalie, St. Thomas
U.S. Virgin Islands 00802
Telephone: (809) 773-1082
Facsimile: (809) 775-5706

Leonard Reed
Assistant Director
U.S. Virgin Islands Department of Planning and Natural Resources
Division of Environmental Protection
1118 Water Gut Homes
Christiansted, St. Croix
U.S. Virgin Islands 00820-5065
Telephone: (809) 773-0565
Facsimile: (809) 773-9310

APPENDIX A
(continued)

Elliott Whisnant
Public Information Specialist
U.S. Virgin Islands Department of Planning and Natural Resources
Nisky Center, Suite 231
No. 45A Estate Nisky
Charlotte Amalie, St. Thomas
U.S. Virgin Islands 00802
Telephone: (809) 774-3320
Facsimile: (809) 775-5706

Cecil A. Williams
Environmental Specialist II
U.S. Virgin Islands Department of Planning and Natural Resources
1118 Water Gut Homes
Christiansted, St. Croix
U.S. Virgin Islands 00820-5065
Telephone: (809) 773-0565
Facsimile: (809) 773-9310

Ms. Aracelis B. Hendry
Acting Assistant Commissioner
U.S. Virgin Islands Department of Health
Charles Howard Complex
3500 Estate Richmond
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (809) 773-6551
Facsimile: (809) 773-5998

Mr. Sharach Gill
U.S. Virgin Islands Department of Health
Assistant Director of Environmental Health
Charles Howard Complex
3500 Estate Richmond - Room 331
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (809) 773-1311
Facsimile: (809) 773-7277

APPENDIX A
(continued)

Raymond George
Assistant Director
U.S. Virgin Islands Water and Power Authority
P.O. Box 1009
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (809) 773-2250
Facsimile: (809) 778-8444

Mr. Sinclair Williams
Deputy Executive Director
U.S. Virgin Islands Housing Authority
P.O. Box 1349
Kingshill, St. Croix
U.S. Virgin Islands 00821-1349
Telephone: (809) 773-3525
Facsimile: (809) 773-3054

Cyrille W. Singleton
State Director
Virgin Islands Territory Emergency Management Agency (VITEMA)
102 Estate Hermon Hill
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (809) 773-2244
Facsimile: (809) 778-8980

III. U.S. Environmental Protection Agency
Region II Representatives

Sherrel Henry
Remedial Project Manager
U.S. Environmental Protection Agency
290 Broadway, 20th Floor
New York, New York 10007-1866
(212) 637-4289

APPENDIX A
(continued)

Lillian Johnson
Chief, Community Relations Branch
U.S. Environmental Protection Agency
290 Broadway, 26th Floor
New York, New York 10007-1866
(212) 637-3000

IV. Citizen Groups

Chamber of Commerce
16-AA Church
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (809) 773-1435
Facsimile: (809) 773-8172
Contact: Al Hayes

League of Women Voters
Attn: Liz Wilson
P.O. Box 890
Christiansted, St. Croix
U.S. Virgin Islands 00821
Telephone: (809) 773-8692

St. Croix Environmental Association
P.O. Box 3839
Christiansted, St. Croix
U.S. Virgin Islands 00822
(809) 773-1989

APPENDIX A
(continued)

V. Media

Newspapers:

The Daily News

P.O. Box 7760

St. Thomas

U.S. Virgin Islands 00801

Telephone: (809) 774-8772

Facsimile: (809) 776-0740

Contact: Harold Anedd

The Daily News

4 Vitraco Mall

Christiansted, St. Croix

U.S. Virgin Islands 00820

Telephone: (809) 773-4425

Facsimile: (809) 773-1621

Contact: Dennis McCluster

Advertising Contact: Alysia

St. Croix Avis

P.O. Box 750

Christiansted

St. Croix, U.S. Virgin Islands 00821

Telephone: (809) 773-2300

Facsimile: (809) 773-5511

Contact: Angela Borchert

Advertising Contact: Linda

The Tradewinds Newspaper

P.O. Box 500

Cruz Bay, St. John

U.S. Virgin Islands 00830

Telephone: (809) 776-6496

Facsimile: (809) 776-7700

Contact: Venessa Barber, Advertising Manager

APPENDIX A
(continued)

The Business Journal

P.O. Box 1208

St. Thomas

U.S. Virgin Islands 00804

Telephone: (809) 776-2874

Facsimile: (809) 774-3636

Contact: Greg Miller

Caribbean Business

P.O. Box 12130

Loisa Street Station

San Juan, Puerto Rico 00914

Telephone: (809) 728-3000

Facsimile: (809) 268-1626

Contact: Mari Carmen Schell

Television Stations:

Channel 8 - WSVI TV

Antilles Broadcasting Corporation

Sunny Isles Shopping Center

Christiansted, St. Croix

U.S. Virgin Islands 00823

Telephone: (809) 778-5008

Facsimile: (809) 778-5011

PSA Contact: Charles Thanos

General Manager: Baraket Saleh

Channel 12 - WTJX TV

Box 7879

Barbel Plaza South

Charlotte Amalie, St. Thomas

U.S. Virgin Islands 00801

Telephone: (809) 774-6255

Facsimile: (809) 774-7092

PSA Contact: Marie Rimer-Martin

Program Manager: Laurie Elskoe

APPENDIX A
(continued)

Radio Stations:

WAVI-FM93

118 Welcome

Christiansted, St. Croix

U.S. Virgin Islands

Mailing Address for Public Service Announcements

P.O. Box 25016

Christiansted, St. Croix

U.S. Virgin Islands 00824

Telephone: (809) 773-3693

Facsimile: (809) 773-3445

PSA Contact: Howard Cloud

Contact: Mr. Douglas Harris

WJKC Isle 95 FM

52 King Street

Christiansted, St. Croix

U.S. Virgin Islands 00822

Telephone: (809) 773-0995

Facsimile: (809) 773-9093

PSA Contact: Alvin G.

Contact: Ms. Jan Lyall

WRRR

1 Mahogany

Frederiksted, St. Croix

U.S. Virgin Islands 00840

Telephone: (809) 772-1290

Facsimile: (809) 772-4041

PSA Contact: Baptite

Contact: Mr. Richard Blom

APPENDIX A
(continued)

Radio One - WVWI
Franklin Building
Charlotte Amalie
St. Thomas, U.S. Virgin Islands 00801
Telephone: (809) 776-1000 / (809) 774-3039
Facsimile: (809) 776-5357
PSA Contact: Dennis Murphy
Program Manager: Nick Russell

WSTX
P.O. Box 3279
Christiansted, St. Croix
U.S. Virgin Islands 00822
Telephone: (809) 773-0390
Facsimile: (809) 773-3515
PSA Contact: Al Blarke
Ricky Barnes
Robert Luke
Bertram Young
Contact: Marisa Rodriguez

APPENDIX B

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APPENDIX B

RECOMMENDED LOCATIONS FOR PUBLIC MEETINGS

Recommended Locations for Public Meetings

- (1) Department of Education Curriculum Center
2123 Hospital Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(809) 778-1600
Contact: Sharon Jackson/Chris Demund
Seating Capacity: 80
Availability: Reserve in advance by telephone
Handicapped Accessibility: Accessible
Fee: \$50

- (2) Little Theater
University of the Virgin Islands
St. Croix Campus
RR 02, Box 10,000
Kingshill, St. Croix
U.S. Virgin Islands 00850
(809) 692-4180
Contact: Karen V. Chapman
Facsimile: (809) 692-4115
Seating Capacity: 73
Availability: Reserve 2 weeks in advance by telephone; reservation form required;
evening meetings only on Fridays
Handicapped Accessibility: Non accessible
Fee: \$50 per hour

APPENDIX C

APPENDIX C

LOCATION OF INFORMATION REPOSITORY AND ADMINISTRATIVE RECORD

Information Repository

The University of the Virgin Islands, St. Croix
Campus Library
Kingshill

St. Croix, U.S. Virgin Islands 00802

Contact: Staff at Reserve Desk

Telephone: (809) 692-4130

Hours of Availability for Reviewing

the Information Repository: Monday - Thursday 8 a.m. - 10 p.m.
Friday 8 a.m. - 4 p.m.
Saturday 9 a.m. - 5 p.m.
Sunday 1 p.m. - 6 p.m.

Tudith J. Rogers

Administrative Record

Department of Planning and Natural Resources

Environmental Protection Division

Water Gut Homes - 1118

Christiansted, St. Croix

U.S. Virgin Islands 00820-5065

Telephone: (809) 773-0565

Facsimile: (809) 773-9310

Contact: Jeffrey D. Quittner

Hours of Availability for Reviewing

the Administrative Record: Monday - Friday 8 a.m. - 5 p.m.

APPENDIX D

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APPENDIX D

GLOSSARY AND ACRONYMS

Administrative Order on Consent: Legal agreement between EPA and potentially responsible parties (PRPs) in which PRPs agree to perform or pay the cost of a site cleanup. The agreement describes actions to be taken at the site.

Administrative Record: File containing all information used by federal decision makers to select a Superfund remedial action for a site.

Cleanup: Actions taken to deal with a release or threatened release of hazardous substances that could affect public health and/or the environment. The term "cleanup" is often used broadly to describe various Superfund response actions, such as a removal action or a remedial action.

Community Relations Plan (CRP): Document that outlines community concerns about and expectations for the remediation of a site identified during community interviews. Also provides a detailed description of community relations activities selected to address those concerns.

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA): Law providing the U.S. Environmental Protection Agency with broad authority to pursue liability, compensation, cleanup, and emergency response for hazardous substances released into the environment, and for the cleanup of inactive hazardous waste disposal sites. Also known as Superfund.

Feasibility Study (FS): Part of a two-phase field study called a remedial investigation/feasibility study. The purpose of the FS phase is to identify and screen alternative methods of remediating a site.

Hazard Ranking System (HRS): The method used by EPA to evaluate the relative potential of hazardous substance releases to cause health or safety problems, or ecological or environmental damage. The HRS score determines whether a site should be placed on the National Priorities List.

Information Repository: File containing information related to the remediation of a Superfund site; repository is located in a building that is accessible to the public.

National Priorities List (NPL): EPA's list of hazardous waste sites identified for possible long-term cleanup under the Superfund program.

APPENDIX D (continued)

Potentially Responsible Party (PRP): Individual or company (such as an owner, operator, transporter, or generator) potentially responsible for, or contributing to, the contamination at a Superfund site. Whenever possible, EPA requires PRPs to clean up sites that they have contaminated.

Preferred Alternative: The restoration action EPA believes will be most effective for a site, as described in the Proposed Plan.

Preliminary Assessment (PA): Part of a two-phased study called a preliminary assessment/site investigation (PA/SI). The purpose of the PA is to collect and review available information about a hazardous waste site to determine whether the site requires further study through a site inspection.

Proposed Plan: An outline of all of the alternatives evaluated in the feasibility study and a statement of the preferred alternative. EPA holds a 30-day public comment period on the Proposed Plan, during which the public may submit comments in writing on the Plan or may voice concerns at a public meeting.

Record of Decision (ROD): Formal statement of the selected alternative for restoring the site. The ROD includes a responsiveness summary, in which EPA answers public comments received during the public comment period on the Proposed Plan.

Remedial Action (RA): Those actions taken at a site to prevent or minimize the release of hazardous substances so that the substances do not migrate to cause danger to present or future public health or the environment.

Remedial Design (RD): The conceptual and engineering plans for the Site remediation.

Remedial Investigation (RI): Part of a two-phase field study called a remedial investigation/feasibility study. The purpose of the RI phase is to gather the data necessary to fully determine the nature and extent of contamination at a site.

Removal Action: An immediate action taken to address a release or threatened release of hazardous substances.

RI/FS Report: Summary of the results of the RI/FS.

RI/FS Work Plan: Outline of how and when the RI/FS will be conducted.

APPENDIX D
(continued)

Site Discovery: The ways that EPA learns of conditions that could present risk to human health and the environment, such as citizen complaints of an unusual odor or of a fire.

Site Inspection (SI): Part of a two-phased study called a preliminary assessment/site inspection (PA/SI). The purpose of the SI is to collect sufficient information to rank the hazard potential of a site. The SI is conducted if the PA turns up evidence that the site may pose a threat to human health and the environment.

Superfund: See CERCLA.

Superfund Amendments and Reauthorization Act of 1986 (SARA): Law designed to include local governments and the public in the process of making decisions about how to address possible chemical hazards in their communities. SARA was signed by the President on October 17, 1986 to amend CERCLA. Reference made to CERCLA throughout this document should be interpreted as meaning CERCLA, as amended by SARA.

Volatile Organic Compound (VOC): An organic (carbon-containing) compound that evaporates (volatizes) readily at room temperature.

APPENDIX E

APPENDIX E

TECHNICAL ASSISTANCE GRANTS

EPA provides community groups with the opportunity to apply for Technical Assistance Grants (TAGs) of up to \$50,000 per Superfund site. With TAG funding, community groups are able to hire technical advisers to interpret Site findings and help the public become more involved in making decisions about cleanup plans.

Citizens who are interested in applying for TAGs may obtain an application package by calling or writing:

Carol Hemington
Technical Assistance Grant Coordinator
U.S. EPA, Region II
290 Broadway, 27th Floor
New York, New York 10007-1866
(212) 637-3402