



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Hollis Griffin, Director
Division of Environmental Protection
Department of Planning and Natural Resources
Division of Environmental Protection
Bldg. 111- Apt. 14A
Water Gut Homes-118
Christiansted, St. Croix USVI 00820-5065

Re: **EPA Response to DPNR's Comments on the Record of Decision for the Virgin Islands Chemical Superfund Site, St. Croix, USVI**

Dear Mr. Griffin:

Enclosed please find EPA's response to your comments on the Record of Decision (ROD) for the Virgin Islands Chemical Site dated September 5, 2001. I hope the responses will satisfy your concerns.

We will be sending you a copy of the draft Responsiveness Summary very shortly.

Sincerely yours,

Melvin Hauptman, P.E., Leader
Sediments/Caribbean Team

Enclosure

cc: Syed Sydali- DPNR
Mike Miner- CDM-FPC

1. **DPNR Comment #1 - ROD-Description of the Selected Remedy/Contingency Remedy (Pages ii-iv, Sections 11.2, 11.3)**

"In the Declaration for Record of Decision - page iii EPA states: *'In addition to the Selected Remedy, EPA will retain a contingency remedy in the event that an analysis of future groundwater monitoring data indicates that it is needed.'*

In Section 11.2 Description of the Selected Remedy pages 24-25 Additional monitoring wells will be installed to support the long term groundwater monitoring program. For both the Above-ground Storage Tank (AST) and Former Process Pit (FPP) areas, additional monitoring wells are planned *'As necessary to support the long term groundwatering (sic) program'*.

Based on DPNR's previous evaluations of reports comments and communications with EPA, the addition of the Contingency Remedy is one of the critical elements for DPNR's final acceptance of the ROD. As stated in a prior written communication with EPA, DPNR believes that detailed criteria for evaluating the effectiveness of MNA and implementation of the Contingency remedy should be included in the ROD."

Response to Comment – The ROD has been revised to include more detailed requirements/criteria for: 1) routinely evaluating the effectiveness of MNA as part of long-term environmental monitoring program and 2) deciding if/when the contingency remedy should be implemented. Such requirements/criteria will conform with EPA's MNA policy and guidance and with *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, Appendix B, Section 4 (entitled "Documenting Remedies Using MNA"). Please also keep in mind that: 1) the detailed requirements and schedule for completion of the RD/RA work will be included in the Consent Decree Statement of Work which is prepared after the ROD is issued and 2) the approval of RD/RA submittals done under the Consent Decree will be made by EPA in consultation with DPNR.

2. **DPNR Comment #2 - Purpose of the ROD (p.ii)**

"DPNR is assuming that Section B (not included in documents supplied for review and comment) will include site characterization data described in item #3, page ii, under Purposes of the ROD: *"Provide the public with a consolidated source of information about the history, characteristics and risks"* at the site. A list and description of all existing and potential and/or proposed future wells in the sampling program for the AST, FPP and MNA areas, including those *"necessary to support the long term groundwatering (sic) program"* should also be included in this section. This data has been supplied in previous RODs reviewed by DPNR."

Response to Comment – The main body of the ROD is intended to provide a consolidated source of information about the site history, characteristics, and risks. Tables and figures (e.g., from the RI and FS reports) have been added to the ROD and

referenced in the corresponding text to better illustrate the pertinent site conditions.

Appendix B is intended to include the Administrative Record index, which is a list of the documents in the administrative record that were considered in reaching the decision and are available to the public for review. The administrative record is maintained locally in the document repository at Department of Education's Curriculum Center and at your office.

Regarding the long-term monitoring program, some additional, general clarifications/requirements have been added to the ROD regarding the monitoring of existing shallow and deep wells. Please keep in mind that: 1) the detailed requirements and schedule for completion of the RD/RA work will be included in the Consent Decree Statement of Work which is prepared after the ROD and 2) the approval of RD/RA submittals under the Consent Decree will be made by EPA in consultation with DPNR. Development of a detailed monitoring program will be completed as part of the RD and will include some additional monitoring wells.

3. DPNR Comment #3 - Purpose of the ROD (p.ii)

A list of COCs, SSLs, MCLs, soil and groundwater sampling points, and historic contaminant concentrations found at the sampling sites should be identified in section B (See #2, above).

Response to Comment – A tabulated list of COCs, SSLs, and MCLs has been included in the ROD. Historic detections of COCs in groundwater and soil have been illustrated on the tables and/or figures to the ROD, as indicated above.

4. DPNR Comment #4 - Institutional Controls Re: Use of Groundwater (sections 3.0, 5.2, 7.0, and 11.2)

As has been implemented at other Superfund Sites, use of groundwater (potable or non-potable) should be restricted at the site pending a complete evaluation of the effects of pumping (onsite and offsite) on contaminant fate and transport. In addition, Institutional Controls for nearby, offsite deep wells should also be implemented if migration of contaminants toward those wells is possible, detected or the current remedy does not achieve plume control.

Response to Comment – As indicated in various sections of the ROD, the selected remedy includes institutional controls to restrict groundwater use at the site until groundwater MCLs are achieved. The existing data do not support the need for institutional controls for offsite production wells. However, monitoring will be performed to ensure the remedy is protective.

5. DPNR Comment #5 - Public Question and Comment Section (Section 9.2.9)

"This section should be submitted to DPNR for comment and review prior to the final

draft of the ROD.”

Response to Comment – This section will be forwarded to DPNR shortly.

6. DPNR Comment #6 - Selected Remedy Re: Groundwater Monitoring Wells (Section 11.2-11.3)

“Due to the past, present or future potential for offsite migration of contaminants into groundwater, nearby deep wells at the perimeter of the site should be included in: the current sampling program, the Contingency Remedy, and identified in the ROD (as has occurred at other Superfund sites).”

Response to Comment - Refer to the response to DPNR Comments #1 and #2.