

TWO THOUSAND WESTCHESTER AVENUE
WHITE PLAINS, N. Y. 10650

March 12, 1996

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

RE: Tutu Wellfield NPL Site
Revised Superfund Proposed Plan

Dear Ms. Kwan:

These brief comments regarding the above-referenced draft document are submitted on behalf of Texaco Caribbean Inc. (TCI). TCI has been identified by the Environmental Protection Agency (EPA) as a potentially responsible party (PRP) at the Tutu Wellfield site.

1. It is unclear from the legend and map in Figure 1 which portions of the plumes indicated represent Chlorinated VOCs >100 ppb.

2. On page 8, right column, we believe that following should be added to the soil objectives in the section titled "Remedial Action Objectives"

Removal of contaminants of concern in-situ, where practicable.

3. On page 9, left column, we believe that the following language should be added after the first paragraph in the section titled "Soil Remedial Alternatives (SRA) for Impacted Soil":

These SCPs can be implemented as early as Spring 1996.

As we have discussed, Texaco has designed and is prepared to implement a remedial system to fulfill the SCP objectives articulated in the Proposed Plan.

4. On page 9, right column, we believe that the language in the third bullet in SRA 1 overstates the objective and should be reworded to say that soil or rock from impacted areas should not be removed unless it is appropriately tested and then, if indicated, properly treated or disposed of.

5. On page 10, right column, we believe that the language in the first full paragraph after the bullets related to SRA 3 should be

modified to state that: "The SVE systems described would be operational until VOCs are present in the extraction well air vapor stream at acceptable levels."

6. On page 12, left column, we believe that the following language should be added after the first paragraph in the section titled Groundwater Remedial Alternatives (GRA) for Impacted Groundwater":

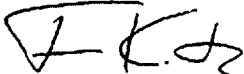
These SCPs can be implemented as early as Spring 1996.

Again, as we have discussed, Texaco has designed and is prepared to implement a remedial system to fulfill the SCP objectives articulated in the Proposed Plan.

7. Regarding GRAs 2-4, we believe that EPA has previously indicated that connection to the WAPA system is a possible component of the alternatives. If this is the case, it should be indicated in the title and text of the alternative descriptions.

Thank you for this opportunity to comment on the Proposed Plan document. Feel free to contact me at 914-253-4633 to discuss these comments.

Sincerely,



Timothy R. Knutson
Counsel for Texaco Caribbean Inc.