

**FILE COPY****GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES**

Department of Planning & Natural Resources
Division of Environmental Protection
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SDMS Document



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May 11, 2001

Mr. Richard Caspe
Director - ERRD
EPA, 290 Broadway
New York, NY 10007-1866

RE: Virgin Islands Chemical Superfund Facility - Response
to EPA letter of 4/19/01

1. EPA response to DPNR comments on VI Chemical Superfund Site
Final Draft Feasibility Study.
2. Proposed Plan for the VI Chemical Superfund Site

Final Draft Feasibility Study

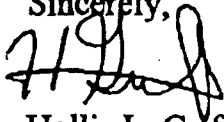
Thank you for your review of DPNR's concerns regarding the characterization of the hydrogeology at Site. After reviewing your response, DPNR believes it must stand by our original comments. Please understand that these comments were not based solely on USGS data and publications but also by direct observations and extensive field experience. Our comments go beyond site-specific, localized conditions because of our concerns to adequately predict contaminant fate and transport.

Proposed Plan

DPNR is pleased to see that EPA recognizes the practicality of retaining Alternative 4 as a contingency remedy. DPNR recognizes the financial attractiveness to EPA in selecting Monitored Natural Attenuation (NMA) as the preferred remedy. However, DPNR retains a healthy skepticism regarding MNA's effectiveness under the varied hydrological conditions exhibited here in the territory and believes that the proposed contingency remedy is justified.

At some point, DPNR would welcome the opportunity to discuss with EPA the various criteria to be used to determine if MNA is providing the proper level of overall protection of human health and the environment. Thank you.

Sincerely,



Hollis L. Griffin
Director

Cc: Caroline Kwan, RPM