

LAW OFFICES OF JOHN K. DEMA, P.C.

JOHN K. DEMA
CAREY-ANNE MOODY

11 November 1994

Roy Adams, Commissioner
Department of Planning and Natural Resources
United States Virgin Islands
Nisky Center
Charlotte Amalie, St. Thomas 00801

Andrew Praschak, Esquire
Assistant Regional Counsel
USEPA - Caribbean Field Office
1413 Fernandez Juncos Avenue
Santurce, Puerto Rico 00909

Ms. Caroline Kwan
Project Manager
USEPA - Region II
26 Federal Plaza, Room 737
New York, New York 10278

Re: Tutu Water Wells Site Investigation
St. Thomas, United States Virgin Islands

Dear Commissioner Adams, Attorney Praschak and Ms. Kwan:

On November 1, 1994, I submitted a letter to you describing in detail my concerns with Geraghty & Miller's attempt in the Draft Phase II RI to exclude Esso from its responsibility for releasing chlorinated hydrocarbons into the Turpentine Run Aquifer. Historical site information is available that documents the fact that chlorinated hydrocarbons were used in profusion over the years at the Esso Tutu Service Station ("ETSS"). Any analyses that excludes, overlooks or otherwise distorts data in an investigation of sources and migration pathways of chlorinated volatile organic chemicals in the groundwater at the Tutu Wells Site is a disservice to the residents of the United States Virgin Islands.

1236 STRAND STREET, SUITE 103, CHRISTIANSTED, ST. CROIX, USVI 00820-5008 • (809) 773-6142 • FAX: (809) 773-3944

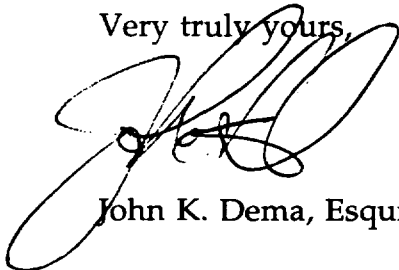
Attached, please see the summary of my letter to you of November 1, 1994. I have also included a few additional comments based on discussions at the meeting held in St. Thomas on November 2-3, 1994. Please note the opinions and data advanced by our experts, including Dr. David Keith Todd and Dr. Paul Fahrenthold, which stand in direct opposition to the conclusions reached by Geraghty & Miller.

Dr. David Keith Todd has published numerous works, including the textbook, Groundwater Hydrology. His recent publication is as co-editor for Geraghty & Miller's The Water Encyclopedia, which is advertised as "The Flagship Publication of the New Geraghty & Miller Book Series."

Dr. Paul Fahrenthold, former Chief of the Organic Chemicals Branch of the U.S. EPA, has over twenty-five years of experience in activities related to the evaluation of groundwater contamination migration.

In summary, I believe that previous activities including soil/aquifer characteristics provide indisputable evidence that Esso Tutu Service Station contributed chlorinated VOCs to the groundwater. Ignoring its contribution is a serious omission and error.

Very truly yours,



John K. Dema, Esquire

JKD/s
Attachments

cc: Four Winds Plaza Partnership