

March 10, 1994

Caroline Kwan
USEPA - Region II
26 Federal Plaza, Room 737
New York, NY 10278

Re: Request for Approval Regarding Proposed Monitoring Well MW-23D and Newly Identified Delegrade Supply Well, Southeast Area of Tutu Well Site, St. Thomas, Virgin Islands.

Dear Ms. Kwan:

In Geraghty & Miller Inc.'s Phase II Remedial Investigation (RI) Work Plan, Tutu Wells Site, St. Thomas, U.S. Virgin Islands, dated December 1993, deep Monitoring Well MW23-D was proposed along a ravine which is the surface expression of a NW-SE trending fracture linement. The purpose of this monitoring well was to delineate the downgradient extent of the southern chlorinated volatile organic compound (VOC) plume. On behalf of Ana Gloria Ramos, Designated Coordinator of the Tutu Environmental Investigation Committee (TEIC), Geraghty & Miller is requesting a modification to the Phase II (RI) Work Plan with respect to this proposed monitoring well.

Legal access to the proposed location of this well has not been obtained due to the lack of response by the landowners to Geraghty & Miller, Inc's requests for access. Also, the physical location of the proposed monitoring well is blocked by a guardrail and woods. The only other access route would require crossing the Turpentine Run.

In a recent U.S. Geological Survey Report (Steiger, J.I. and Kessler, R., 1993; copy enclosed), a domestic supply well (Delegrade) is identified approximately 280 feet southeast of proposed Monitoring Well MW-23D (see enclosed figure). The Delegrade supply well is

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reported to be 70 feet deep; the surface elevation at the well is reported as 70 feet above mean sea level (msl). The bottom of this supply well would be at approximately sea level. The proposed depth of Monitoring Well MW-23D was to be 60 feet below land surface with a 20-foot long open interval from 40 to 60 feet below land surface. Land surface elevation at the proposed location of Monitoring Well MW-23D is approximately 72 feet above msl. The bottom elevation of this proposed monitoring well would be at approximately 12 feet above msl. The Delegarde supply well, then, is an appropriate alternative to the installation of Monitoring Well MW-23D.

The TEIC and Geraghty & Miller are proposing to eliminate the installation of MW-23D from the Phase II RI and incorporate the Delegarde supply well into the supply well inspection and groundwater sampling program. We request your approval of this modification. If you have any questions, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Thomas V. Danahy

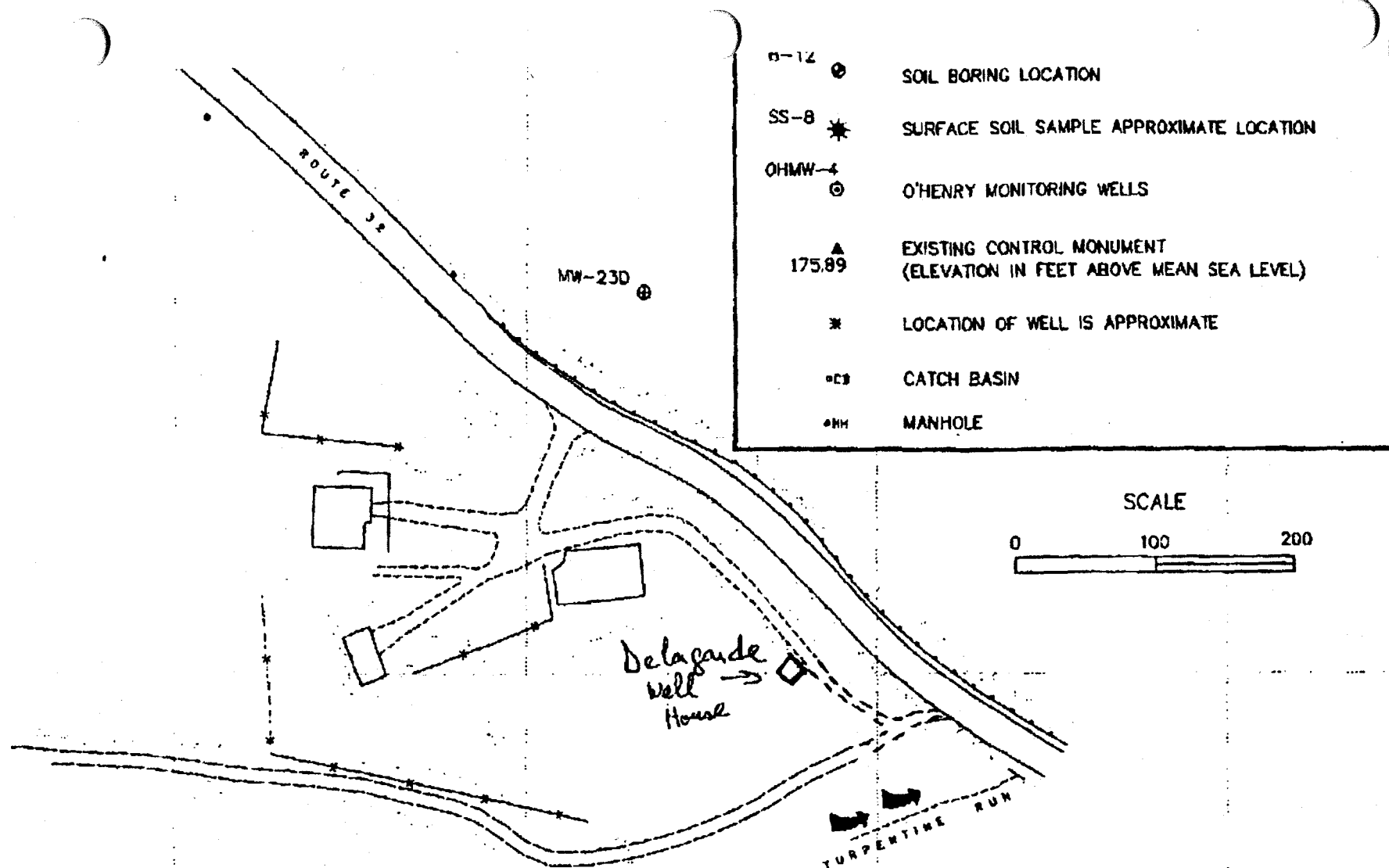
Thomas V. Danahy
Senior Scientist/Project Manager

Arnold S. Vernick for

Daniel A. Nachman
Vice President/Project Director

c: Ana Gloria Ramos - TEIC
Paul Ryan - Texaco

Enclosures
PR0013.033
SC/ls
PR0013.***WP2/030394.ltr



		BY	APPR.	PROPOSED PHASE II REMEDIAL INVESTIGATION MONITORING WELL, SITE INSPECTION, AND SOIL-GAS SURVEY LOCATIONS TUTU WELLS SITE ST. THOMAS, U.S. VIRGIN ISLANDS	FIGURE 7-1 REVISED