

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: OCT 27 1994

Carole

SUBJECT: RCRA Review of Draft Remedial Investigation (RI) for Tutu Wells Site, Virgin Islands

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The Tutu Wells were historically used as a potable water supply source. Through the presence of UST's located at several service stations, auto recycling operations, and dry cleaning establishments, the ground water has become contaminated with BTEX and chlorinated solvent compounds located in a plume approximately 108 acres in size. Chlorinated VOC's and BTEX compounds exceed EPA maximum contaminant levels in the ground water. An information request letter was sent to several possible sources of contamination under Section 104 of CERCLA and 3007 of RCRA. A subsequent Administrative Order (AO) issued by EPA required ground water monitoring and placement of residents affected by contamination on a public water source. RCRA comments include the following:

- 1) Where RCRA waste or hazardous constituents contribute to contamination of the aquifer, RCRA standards specify source control and treatment of the ground water and other media to below health based levels.
- 2) Any waste that is found to be RCRA hazardous during any subsequent remediation activities, must be managed in accordance with RCRA standards.
- 3) Since it appears that sources of RCRA waste constituents in the ground water are small business operators, an education or outreach program is appropriate to notify these sources of the proper handling and disposal of hazardous waste.