



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Ocean Resources Conservation and Assessment
Hazardous Materials Response and Assessment Division
Coastal Resources Coordination Branch
Room 1859
290 Broadway
New York, New York 10007

MEMORANDUM

TO: Shari Stevens, BTAG Coordinator
FROM: ^{DZW} Diane Wehner, NOAA CRC
SUBJECT: Tutu Wells Site Feasibility Study
DATE: April 20, 1995

Thank you for the opportunity to review the Feasibility Study (FS) for the Tutu Wells Site located in St. Thomas, U.S. Virgin Islands. The following comments are offered for consideration by the Biological Technical Assistance Group (BTAG).

I have attached a copy of a Coastal Hazardous Waste Site Review prepared in 1993 by NOAA on the Tutu Wells Site. The review highlights NOAA's concern regarding elevated levels of contaminants, especially trace elements, detected in groundwater samples in 1987 and again in 1990. It is unclear why all subsequent samples were analyzed for organic compounds only. Comparison of maximum trace element concentrations in groundwater to ten times AWQC (used for screening purposes to account for dilution in surface water) showed five trace elements were present at elevated levels (see Table 2 of the Waste Site Review). The FS should note the reason why trace element contamination was not given further consideration.

Turpentine Run, an intermittent stream, runs adjacent to the site and flows south, eventually discharging to Mangrove Lagoon, 4.5 km from the site. Turpentine Run also serves as a drainage corridor for eastern St. Thomas and receives various inputs of municipal effluent.

Mangrove Lagoon is known to provide nursery and adult habitat for numerous Caribbean reef fish. In comments on the Endangerment Assessment and Remedial Investigation for this site, the BTAG expressed concern regarding Turpentine Run as a possible route of contaminant transport into a downstream wetland area. It is assumed this wetland is situated between the site and Mangrove Lagoon. Since no off-site surface water, sediment or biota sampling was conducted during the RI, it is impossible to evaluate the potential for impacts to the downstream wetland area and possibly Mangrove Lagoon. At a minimum, characterization of the downstream wetland area (including a description of the type of wetland present and ideally some sampling of wetland sediment) needs to be completed and information regarding any link between it and Mangrove Lagoon needs to be provided. Though surface water and sediment sampling of the enclosed portions of Turpentine Run on-site suggested there was not the potential for impacts to ecological receptors, sediment sampling downgradient of this enclosed area where sediments might tend to settle out is needed to properly evaluate the potential for off-site migration of site-related contaminants.

Please contact me at (212)637-3259 should you have any questions regarding these comments.

Attachment

cc: Caroline Kwan, NYCSB2
Gina Ferreira, ERRD-PSB
Robert Hargrove, EIB
Charles Merckel, USFWS